



Report

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Cornwall Council

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# Habitats Regulations Assessment of Proposed Schedule of Further Significant Changes to the Cornwall Local Plan Strategic Policies Proposed Submission Document

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# Contents

|          |   |            |
|----------|---|------------|
| <b>1</b> | <b>Introduction.....</b>  | <b>5</b>   |
| <b>2</b> | <b>Likely Significant Effects .....</b>   | <b>6</b>   |
| 2.1      | Summary .....   | 6          |
| 2.2      | Screened Out Policy Changes .....   | 8          |
| 2.3      | Further Significant Change with Potential to Result in Likely Significant Effects ..... | 29         |
| <b>3</b> | <b>Recreational Pressure.....</b>   | <b>38</b>  |
| 3.2      | Marazion Marsh SPA .....  | 39         |
| 3.3      | Fal & Helford SAC .....   | 41         |
| 3.4      | Falmouth Bay to St Austell Bay pSPA .....   | 41         |
| 3.5      | Godrevy Head to St Agnes SAC .....  | 43         |
| 3.6      | Penhale Dunes SAC .....   | 43         |
| 3.7      | Carrine Common SAC.....   | 44         |
| 3.8      | Plymouth Sound and Estuaries SAC/ Tamar Estuaries Complex SPA .....                     | 44         |
| 3.9      | Summary .....   | 45         |
| <b>4</b> | <b>Air Quality.....</b>   | <b>46</b>  |
| 4.1      | Introduction.....   | 46         |
| 4.2      | Appropriate Assessment .....  | 46         |
| <b>5</b> | <b>Water Resources and Water Quality .....</b>  | <b>49</b>  |
| 5.1      | Introduction.....   | 49         |
| 5.2      | European site background.....   | 49         |
| 5.3      | Appropriate Assessment .....  | 51         |
| 5.4      | Other plans and projects .....  | 52         |
| <b>6</b> | <b>Coastal Squeeze .....</b>  | <b>53</b>  |
| 6.1      | Introduction.....   | 53         |
| 6.2      | European site background.....   | 53         |
| 6.3      | Appropriate Assessment .....  | 53         |
| 6.4      | Other plans and projects .....  | 54         |
| 6.5      | Conclusion.....   | 54         |
|          | <b>Appendix A. Locations of Internationally Designated Sites.....</b>                   | <b>55</b>  |
|          | <b>Appendix B. Air quality calculations .....</b>                                       | <b>556</b> |

## List of Tables

|   |    |
|---|----|
| Table 1: Policy change No. 1 .....  | 8  |
| Table 2: Policy change No. 2 .....  | 8  |
| Table 3: Policy change No. 4 .....  | 10 |
| Table 4: Policy change No. 5 .....  | 10 |
| Table 5: Policy change No. 6 .....  | 11 |
| Table 6: Policy change No. 7 .....  | 12 |
| Table 7: Policy change No. 8 .....  | 13 |
| Table 8: Policy change No. 9 .....  | 14 |
| Table 9: Policy change No. 10 .....   | 15 |
| Table 10: Policy change No. 11 .....  | 15 |
| Table 11: Policy change No. 13 .....  | 16 |
| Table 12: Policy change No. 14 .....  | 17 |
| Table 13: Policy change No. 15 .....  | 18 |
| Table 14: Policy change No. 17 .....  | 18 |
| Table 15: Policy change No. 18 .....  | 19 |
| Table 16: Policy change No. 19 .....  | 20 |
| Table 17: Policy change No. 20 .....  | 21 |
| Table 18: Policy change No. 21 .....  | 21 |
| Table 19: Policy change No. 22 .....  | 21 |
| Table 20: Policy change No. 22A .....   | 22 |
| Table 21: Policy change No. 23a .....   | 22 |
| Table 22: Policy change No. 23 .....  | 24 |
| Table 23: Policy change No. 24 .....  | 25 |
| Table 24: Policy change No. 25 .....  | 26 |
| Table 25: Policy change No. 26 .....  | 27 |
| Table 26: Policy change No. 27 .....  | 27 |
| Table 27: Policy change No. 28 .....  | 28 |
| Table 28: Policy change No. 2a .....  | 29 |
| Table 29: (Table 1) Broad distribution of new dwellings will be a minimum of (Change No. 18): ..... | 33 |
| Table 30: Policy change No. 3 .....   | 35 |
| Table 31: Policy change No. 12 .....  | 37 |
| Table 32: Additional Settlements identified within Change 2a.....                                   | 38 |

# 1 Introduction

- 1.1.1 AECOM (formerly URS) undertook Habitats Regulations Assessment (HRA) of Cornwall's Proposed Submission Local Plan in 2014<sup>1</sup> and the subsequent Schedule of Changes prior to the Examination in Public. The HRA of the Proposed Submission document took into account comments made by Natural England and Cornwall Council's response to the Natural England comments reflected within the Proposed Submission version of the Local Plan and a Statement of Common Ground was reached between Natural England and Cornwall Council prior to the Examination. Following the first part of the Examination in Public, the Planning Inspector raised a number of issues with the Local Plan that require preparation of further significant changes which require consultation prior to the resuming of the Examination. Since changes are being made to the Plan it is necessary to consider the implications for internationally important wildlife sites. Further visitor survey work regarding key sites has been undertaken since the previous HRA was completed and this report therefore also takes the opportunity to update its analysis with regard to recreational pressure on those sites. In addition, air quality and transport modelling has been undertaken to support the significant further changes of the Local Plan. This HRA assesses policy changes to the Proposed Submission Local Plan that aim to address the issues raised by the Planning Inspectorate.
- 1.1.2 The assessment presented in this report is not intended to be a stand-alone report that comprehensively recaps all the methodology, issues and analyses that were covered in the October 2014 Local Plan Proposed Submission HRA<sup>2</sup>. Rather, it is intended to be a supplementary document by specifically identifying any issues with the proposed Policy changes. For full background to European sites and impact pathways the reader should therefore refer back to the October 2014 HRA<sup>3</sup>.

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<sup>1</sup> URS (2014). Cornwall Local Plan Habitats Regulations Assessment.

<sup>2</sup> Ibid

<sup>3</sup> Ibid

## 2 Likely Significant Effects

### 2.1 Summary

2.1.1 The need for HRA is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats & Species Regulations 2010. The ultimate aim of the Habitats Directive is to “*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*” (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status. European sites (also called Natura 2000 sites) can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites.

#### ***Bristol Channel Approaches pSAC***

2.1.2 Since the previous iteration of the HRA for the Cornwall Local Plan, a new possible European designated site has been formally identified: The Bristol Channel Approaches possible Special Area of Conservation (pSAC). This site is proposed to be designated for its population of the Annex II species the harbour porpoise (*Phocoena phocoena*). The Draft Conservation Objectives and Advice on Activities<sup>4</sup> document for the Bristol Channel Approaches pSAC notes that ‘*Disturbance of harbour porpoise generally, but not exclusively, originates from activities that cause underwater noise*’ (which won’t be associated with the Cornwall Plan) and that ‘*Any disturbance should not lead to the exclusion of harbour porpoise from a significant portion of the site for a significant period of time*’. So in other words any disturbance would have to be substantial for it to potentially affect the population. Collision with recreational boats (and shipping and tidal energy installations etc.) is mentioned as an activity that may have an impact but this is also noted as being ‘*medium/low*’ risk. The Draft Conservation Objectives and Advice on Activities document adds that ‘*Post-mortem evidence indicates that few collisions between harbour porpoise and vessels occur and is not a significant pressure for this species*’. Based on this information, the above noted pressures upon the newly proposed Bristol Channel Approaches pSAC designated for harbour porpoises can be screened out from further consideration.

2.1.3 The Draft Conservation Objectives and Advice on Activities document also notes that harbour porpoise are sensitive to increases in contaminants from discharge/run-off from land-fill, terrestrial and offshore industries. The document details that a significant pollution issue for at least some cetacean species in European waters, (includes harbour porpoise) is organochlorines (e.g. Polychlorinated biphenyls [PCBs]), Whilst no longer produced and banned from use within the UK (unless covered by an exception), many waterways (and associated sediments) contain historical PCB pollutants, which accumulate in top predators such as cetaceans. Activities that have the potential to re-suspend or reintroduce these pollutants could result in a likely significant effect upon the pSACs feature. However, no Policies within the Local Plan have potential to result in the increased re-suspension or reintroduction of PCBs currently within the environment. No other forms of contamination are detailed within the Draft Conservation Objectives and Advice on Activities document. As such, this Bristol Channel Approaches pSAC can be screened out from further assessment.

#### ***The Local Plan***

2.1.4 The main relevant change to the Local Plan within the further significant changes document from an HRA point of view is an increase in the housing target from 47,500 new dwellings to 52,500 dwellings to the end of the Plan period (2030). The HRA of the Proposed Submission Local Plan (October 2014)<sup>5</sup> identified locations within which an increase in development could lead to an adverse effect on European sites without mitigation.

<sup>4</sup> JNCC (2016). Harbour Porpoise (*Phocoena phocoena*) possible Special Area of Conservation: Bristol Channel Approaches / Dynesfeydd Môr Hafren. Draft Conservation Objectives and Advice on Activities January 2016

<sup>5</sup> Ibid

- 2.1.5 Further significant changes to Policies where likely significant effects could be screened out are assessed within Section 2.2. Following an initial sieve of Policy changes, Policy changes 2a, 3 and 12 detail an increase in residential development and the location for this, along with increases in employment areas. These have potential to result in likely significant effects via different impact pathways. These are recreational pressure, air quality, water resources and water quality, and coastal squeeze. Policy changes 2a, 3 and 12 are assessed and discussed within Section (2.3).

## 2.2 Screened Out Policy Changes

2.2.1 This section details Policy changes that have been screened out from further assessment and the reason why.

2.2.2 Policy changes can be identified as follows: where text has been added this is identified by **bold and italic**, where text has been removed, this is identified with a ~~strikethrough~~.

Table 1: Policy change No. 1

| Policy change No., Policy Number, and Location of Change  | Proposed Change   |
|---|---|
| Policy change No. 1<br><br><b>Policy 1: Presumption in favour of sustainable development</b><br><br>Para 2 only | We will work with applicants, infrastructure providers and the local community to find solutions which mean that proposals will be approved wherever possible, and to secure development that improves the <b><i>economic, social and environmental conditions</i></b> in the area. |

2.2.3 This is a small but positive change to this policy. It provides for the improvement in ‘environmental conditions’ resulting from development. This is a positive policy as it refers to working with infrastructure providers to secure development that improves environmental conditions (e.g. not leading to a reduction in environment conditions; i.e. not resulting in likely significant effects). There are no impact pathways present that link this policy to an internationally designated site and this policy can be screened out from further consideration.

Table 2: Policy change No. 2

| Policy change No., Policy Number, and Location of Change                          | Proposed Change   |
|---|---|
| Policy change No. 2<br><br><b>Policy 2 – Spatial Strategy</b><br><br>Whole Policy | <p><b><i>New development should provide a sustainable approach to accommodating growth; providing a well balanced mix of economic, social and environmental benefits. This should maintain the dispersed development pattern of Cornwall and provide homes and jobs in a proportional manner based on the role and function of each place. Strategic scale growth will be accommodated in our main towns and city where they can best support regeneration and sustainable development. Overall, development should seek to meet the following objectives of the plan for Cornwall:</i></b></p> <p><b><i>1. Respecting and enhancing quality of place:</i></b></p> <p><b><i>Proposals should maintain and respect the special character of Cornwall, recognising that all urban and rural landscapes, designated and undesignated are important by:</i></b></p> <p><b><i>a. Ensuring that the design of development is high quality and demonstrates a cultural, physical and aesthetic understanding of its location;</i></b></p> <p><b><i>b. Causing no significant adverse impact upon the biodiversity, beauty and diversity of landscape and seascape, character and setting of settlements, wealth of natural resources, agricultural, historic and recreational value of Cornwall;</i></b></p> <p><b><i>c. Identifying the value and sensitivity of the character and importance of landscapes, environmental and historic assets and ensuring that they are protected, enhanced and conserved proportional to their value;</i></b></p> <p><b><i>d. Protecting, conserving and enhancing the landscape character and the natural beauty of the AONB and undeveloped coast, and the outstanding universal value of the World Heritage Site.</i></b></p> <p><b><i>2. Providing solutions to current and future issues:</i></b></p> |

**Proposals should assist the creation of resilient and cohesive communities by:**

- a. **Delivering renewable and low carbon energies, increasing energy efficiency and minimising resource consumption through a range of renewable and low carbon technologies;**
- b. **Ensuring that built and environmental assets can adapt to and be resilient to climate change;**
- c. **Creating resilient landscapes and sensitively accommodating investment and growth within Cornwall's unique landscape, ensuring that people continue to be drawn to Cornwall to visit and invest and for a thriving healthy population to live and work;**
- e. **Supporting the development and delivery of Neighbourhood Plans and other community based initiatives that help to make communities more resilient.**

**3. Generating and sustaining economic activity:**

**Proposals will be welcome should that improve conditions for business and investment in Cornwall, in particular by:**

- a. **Supporting key regeneration activities and the economic vision for Cornwall;**
- b. **Providing homes and jobs in a proportional manner where they can best sustain the role and function of local communities and that of their catchment;**
- c. **Supporting the expansion of existing businesses and the indigenous businesses of agriculture, fishing and mining;**
- d. **Safeguarding waterfront sites, docks and ports to provide for marine businesses;**
- e. **Maximising the economic growth and benefits of education, skills development, research and the colleges and Combined Universities in Cornwall;**
- f. **Supporting employment schemes in both towns and rural areas, giving particular emphasis to quality, permanent work opportunities that break seasonal labour cycles;**
- g. **Supporting smart specialisation sectors including; food; aerospace; marine; renewable energies (including geothermal); and cultural industries;**
- h. **Supporting the provision of work hubs and the ability to work from home through live/work units;**
- g. **Supporting the Enterprise Zone Aerohub at Newquay Airport as an economic catalyst for the wider Newquay, Clay Country and St Austell area through improved linkages;**
- h. **Supporting the economic regeneration of Camborne, Pool and Redruth;**
- i. **The regeneration of Hayle, focussing mainly on the harbour area and the development of the wave hub and associated employment development;**
- j. **Optimising the economic opportunity and maximise existing linkages in mid-Cornwall by:**
  - i. **supporting the role of Bodmin as a strategic employment location taking advantage of its position on the transport network;**
  - ii. **identifying mixed use development to deliver the eco-community at West Carclaze / Baal and Par Docks, to help deliver an exemplar development that provides a showcase for sustainable, greener, low carbon living;**
  - iii. **supporting the economic regeneration of St Austell as a centre for retail, business and leisure with a focus on promoting 'green' industries;**
- k. **Supporting economic development in south east Cornwall that meets the area's own needs and benefits from its relationship with Plymouth;**
- l. **Supporting Truro's wider role as an economic and service centre and maintain its role in the retail hierarchy and as a retail alternative to major centres outside of Cornwall;**
- m. **Strengthening the role of Launceston and Saltash as gateways to Cornwall;**
- n. **Supporting the economic regeneration of Penzance, including the improvement of Penzance Harbour, and retention of a main line rail link to Penzance as a strategic link for Cornwall and the UK.**

2.2.4 This policy has been re-written (also see policy 2a in Section **Error! Reference source not found.**). This new Spatial Strategy includes positive reference to providing 'environmental benefits'. Point 1.b is positive, ensuring no significant adverse effects upon biodiversity and wealth of natural resources. Point 1.c

identifies the need to protect, enhance and conserve the value and sensitivity of the environment. This policy does identify areas for development; however, type and extent of development are not identified. This is generally a positive policy. There are no impact pathways present that link this policy to an internationally designated site and this policy can be screened out from further consideration.

**Table 3: Policy change No. 4**

| Policy change No., Policy Number, and Location of Change  | Proposed Change   |
|---|---|
| <p>Policy change No. 4</p> <p><b>Policy 4: Shopping, services and community facilities</b></p> <p>Throughout Policy</p> | <p>1. Development will be permitted where it supports the vitality and viability of town centres and maintains and enhances a good and appropriate range of shops, services and community facilities. Retail and other <i>main</i> town centre uses outside defined town centres (with the exception of small scale rural development) <b>must demonstrate the application of a sequential approach to site selection and</b> show there is no significant adverse impact on the viability and vitality of, <b>and investment within</b>, the existing centres <del>and demonstrate the application of a sequential approach to site selection or demonstrate an overriding strategic role for the economic and social sustainability of Cornwall. Residential development, such as accommodation for the elderly is supported in town centres where it supports the vitality and viability of town centres.</del></p> <p><b>2. Proposals for change of use or redevelopment will be permitted within Primary Shopping Areas where the proposal would maintain or add to the vitality and viability of the centre and would not reduce the predominance of retail and other main town centre uses;</b></p> <p><b>23.</b> Community facilities and local shops should, wherever possible, be retained and new ones supported. Loss of provision will only be acceptable where the proposal shows:</p> <ul style="list-style-type: none"> <li>a. no need for the facility or service;</li> <li>b. it is not viable; or</li> <li>c. adequate facilities or services exist or <b>the service can be</b> <del>are being re-</del> provided <b>in locations</b> that are similarly accessible by walking, cycling or public transport.</li> </ul> |

2.2.5 In the Proposed Submission HRA, this policy was screened in due to the fact that ‘*dependent on its nature and location, economic development can contribute to pathways of impact that can lead to likely significant adverse effects on European sites particularly through increased transport. The likelihood of Cornwall residents travelling to particular centres of population is incorporated into transport modelling that informs the air quality assessment later in this document.*’ However, changes to other policies within the further significant changes (specifically the wording to protect European sites in Policy 23a) have ensured that no likely significant effects arise. As such there are no impact pathways present and this policy can be screened out from further consideration. Nonetheless, it is important to confirm that the increase in housing proposed across Cornwall will not result in an adverse air quality effect on internationally important sites. The air quality analysis undertaken for the previous HRA has therefore been updated, as documented later in this document.

**Table 4: Policy change No. 5**

| Policy change No., Policy Number, and Location of Change                                    | Proposed Change  |
|---|--|
| <p>Policy change No. 5</p> <p><b>Policy 5: Jobs and skills</b></p> <p>Throughout Policy</p> | <p><b>Flexibility is crucial for the delivery of economic growth</b>, to stimulate new jobs and economic growth, development proposals will be supported where they contribute to any of the following:</p> <p>1. The <b>development</b> of tourism facilities through <b>enhancement of existing and</b> the provision of <b>new</b> high quality sustainable tourism facilities, attractions <b>and</b> accommodation <b>of an appropriate scale in locations that are accessible by a range of transport modes and provide a well balanced mix of economic, social and environmental benefits. Where the proposal would</b> <del>and the upgrading-upgrade</del> existing facilities in sustainable locations <b>this should be appropriate in scale to their location and help to ensure the future viability of the business;</b></p> |

|  |  |
|--|--|
|  | <p>2 Support growth in the marine sector in ports and harbours ensuring <b>that</b> marine related employment, leisure and community sites are protected from alternative uses that do not require water side locations</p> <p><b>3. Provide education facilities that improve the training and skills base and encourage knowledge based businesses and creative industries associated with Cornwall's colleges and the universities, particularly where this enables graduate retention.</b></p> <p><b>Existing strategic employment land and buildings will be safeguarded. In all other cases existing employment land and buildings will be safeguarded where they remain viable for an employment use. Such land and buildings will only be considered for alternative uses where this does not result in the loss of economic performance of the site or location i.e. through the redevelopment for a mix of uses.</b></p> <p><del>1. Provide education facilities that improve the training and skills base and encourage knowledge based businesses and creative industries associated with Cornwall's colleges and the universities particularly where this enables graduate retention.</del></p> <p><del>a.</del></p> <p><del>b. Existing and potential strategic employment land and buildings along with sites considered locally important will be safeguarded. In all other cases existing employment land and buildings will be safeguarded where they are viable. Such land and buildings will only be considered for alternative uses where this does not result in the loss of economic performance i.e. through the redevelopment for a mix of uses.</del></p> <p>Employment proposals should be located either:</p> <p>a. within or well integrated to our city, towns and villages; or</p> <p>b. <b>as extensions to</b> an existing employment (uses B1, B2 and B8) <del>locations</del> <b>sites</b> where re-location would be impractical or not viable; or</p> <p>c. within areas that are well served by public transport and communications infrastructure; or</p> <p>d. in the countryside and smaller rural settlements where it is of a scale appropriate to its location or where the use can show an overriding <b>locational and</b> business need <b>to be in that</b> <del>for its</del> location.</p> |
|--|--|

2.2.6 In the Proposed Submission HRA, this policy was screened in due to the fact that ‘*dependent on its nature and location, economic development can contribute to pathways of impact that can lead to likely significant adverse effects on European sites particularly through increased transport.*’ However, changes to other policies within the further significant changes (specifically the wording to protect European sites in Policy 23a) have ensured that no likely significant effects arise. As such there are no impact pathways present and this policy can be screened out from further consideration. Nonetheless, it is important to confirm that the increase in housing proposed across Cornwall will not result in an adverse air quality effect on internationally important sites. The air quality analysis undertaken for the previous HRA has therefore been updated, as documented later in this document.

**Table 5: Policy change No. 6**

| Policy change No., Policy Number, and Location of Change | Proposed Change   |
|--|---|
| Policy change No. 6<br><b>Policy 6: Housing mix</b>      | New housing developments <b>of 10 dwellings or more</b> <del>will be required</del> <b>should</b> include a mix of house size, type, price and tenure to address identified needs and market demand and to support mixed communities. <del>based on the following principles</del> <b>Proposals should seek to provide:</b> |

|                   |   |
|-------------------|---|
| Throughout Policy | <p>1. <del>Proposals of 10 or more dwellings should seek to provide a range of</del> <b>An appropriate mix of housing sizes, types and tenure that:</b></p> <p><b>i) Addresses the need and demand for both affordable and market housing; and</b><br/> <b>ii) Contributes to the diversity of housing in the local area; and</b></p> <p>2. A greater density and appropriate mix of housing through:</p> <ul style="list-style-type: none"> <li>• <del>Addressing affordable housing need and housing demand</del> <b>for both affordable, market housing and starter homes including self-build and custom-build housing; and</b></li> <li>• <b>Using local evidence of the need and demand for specific types, tenures and sizes of housing to</b> contribute to the diversity of housing in the local area and help to redress any housing imbalance that exists; <b>and</b></li> <li>• Responding to the requirements of a changing population <b>and of particular groups in the community by increasing the supply of accessible and specialist housing (including ground floor flats, flats with lifts and bungalow accommodation) which is able to meet people’s needs throughout their lifetimes based on locally derived evidence of need and demand.</b> And</li> <li>• <del>Employ imaginative design solutions.</del></li> </ul> <p><b>3. On larger developments (typically of 100 dwellings or more) at least 5% of total plots should be provided as serviced plots to enable the construction of self-build or custom build housing. On sites of 200 dwellings or more, additional specialised housing (including extra care housing) should be considered where demand exists to meet defined specialist needs.</b></p> |
|-------------------|---|

2.2.7 This is essentially a development management policy, defining the mix of houses to be provided such as size, type, price and tenure. It is noted that new residential development does provide for impact pathways linking to internationally designated sites. However, this policy does not identify any quantum or location of residential development. As such there are no impact pathways present and this policy can be screened out from further consideration.

Table 6: Policy change No. 7

| Policy change No., Policy Number, and Location of Change   | Proposed Change   |
|--|---|
| <p>Policy change No. 7</p> <p><b>Policy 7: Housing in the countryside</b></p> <p>Throughout Policy</p> | <p>Additional accommodation to meet <b>housing</b> needs in the open countryside will be focused of the use of <b>permitted where it would utilise</b> existing <b>lawful residential or non-residential buildings 10 years old or greater through either.</b></p> <p>1. Replacement dwellings <del>(excluding caravans and chalets)</del> <b>proportionate to the size of the dwelling being replaced and</b> of an appropriate scale and character <b>to their location</b> or <b>the</b> subdivision of existing residential dwellings; <b>or.</b></p> <p>2. Reuse <b>of</b> suitably constructed redundant or disused buildings <del>which</del> <b>that</b> are considered appropriate to retain and would lead to an enhancement to the immediate setting.</p> <p><del>In addition</del> <b>Exceptions to this policy apply where the dwelling is required for:</b></p> <p>3. <del>Accommodation</del> <b>Accommodating workers (including seasonal migrant workers), to support established and viable rural businesses where no other suitable accommodation is available and it would be</b> of a construction suitable for its purpose and duration, <del>for workers (including seasonal migrant workers) and where no other suitable accommodation is available, to support established and viable rural businesses and;</del> or</p> |

4. ~~Dwellings for Full time agricultural and forestry and other rural occupation workers will be allowed where **there is up to date evidence of a functional need of the business for the occupier to live in that specific location.** Appropriate for these needs and supported by an up to date evidence of need.~~

2.2.8 This is a development management policy that sets the principles regarding delivery of housing in the countryside but does not define any quantum or location. As such, it can be screened out.

Table 7: Policy change No. 8

| Policy change No., Policy Number, and Location of Change                                   | Proposed Change   |
|--|---|
| <p>Policy change No. 8</p> <p><b>Policy 8 – Affordable Housing</b></p> <p>Whole Policy</p> | <p>All new housing schemes within the plan, <del>including mixed use schemes,</del> on sites where there is a net increase of two units or more or 0.2 of a hectare <b>or greater</b>, developments (not including replacement dwellings) must contribute towards meeting affordable housing need.</p> <p>Developments <del>will</del> <b>must</b> aim to provide the target levels of affordable housing as set out below: <del>Contributions will be in accordance with the requirements set out in the Affordable Housing SPD. The SPD provides guidance on viability and the circumstances under which contributions may be varied or reviewed.</del></p> <p>The following provision on site will be sought:</p> <p><b>50% in Zone 1 including Rock with Tredrizzick</b><br/>                     50% in Zone 1 and 2 including the town of St Ives;</p> <p><b>40% in Zone 2 including the towns of St Ives with Carbis Bay and Padstow;</b></p> <p><b>35% in Zones 3 including the towns Falmouth with Penryn; Truro with Threemilestone and Shortlanesend and Newquay</b></p> <p><b>30% in Zone 4 including the towns of Bodmin; Bude with Stratton, Flexbury and Poughill; Saltash; Hayle; Launceston; Wadebridge and Penzance with Newlyn, Heamoor, Gulval and Longrock; Callington, Camelford, St Agnes, Gunnislake, Perranporth</b></p> <p><b>25% in Zone 5 including the towns of Camborne, Pool, Illogan and Redruth; Helston, Liskeard, St Austell</b><br/>                     40% in Zones 3, 4 and 5 including the towns of Falmouth / Penryn; Truro; Bodmin; Bude; Saltash; Hayle; Launceston; St Austell; Wadebridge; Penzance; Camborne / Pool / Redruth; Helston and Liskeard.</p> <p>The mix of affordable housing products will vary through negotiation and shall be provided taking into account the Council's evidence of housing need and any viability constraints identified, reflecting the different markets in different value zones. However, the target provision is typically in the following tenure proportions:</p> <p><b>70% rented homes</b> owned and or managed by a bona fide affordable housing provider as affordable housing, provided that the initial rent level (inclusive of any relevant service charges) does not exceed the local housing allowance</p> <p><b>30% intermediate housing</b> for rent or sale, provided that the homes are available at first and subsequent occupation at a price which is affordable to a typical local household, taking into account the estimated purchasing power in such households.</p> |

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|  | <p>Planning obligations will be used to ensure that affordable housing is provided and retained for eligible local households.</p> <p>There may be some circumstances, particularly on sites of 5 dwellings or less, where it is more economic or sustainable to seek a financial contribution towards the provision of affordable housing on an alternative site.</p> <p>Any off site contributions <del>will</del> <b>must</b> be broadly equivalent in value to on site provision and secured to support the delivery of affordable housing through a planning obligation.</p> <p><del>The Council may in some circumstances, subject to viability, also seek a contribution towards affordable housing from a non-housing development judged to have a significant and demonstrable impact on the local housing market.</del></p> <p>A financial or other contribution will be sought from proposals to remove holiday occupancy restrictions on <b>2 or more</b> existing dwellings where there is evidence of need and where development would otherwise have been provided on site for community infrastructure including affordable housing.</p> <p><b><i>Where the splitting of a site would result in two or more sites that are physically adjoined, the Council will consider the capacity and suitability of the entire developable area for the purpose of determining whether it falls above or below the affordable housing thresholds. This includes situations where the density or number of units in a proposal is lower than might reasonably be expected.</i></b></p> |
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2.2.9 This is a development management policy that sets the principles regarding delivery of affordable housing in the countryside but does not set the quantum or location. As such, it can be screened out.

Table 8: Policy change No. 9

| Policy change No., Policy Number, and Location of Change   | Proposed Change  |
|--|--|
| <p>Policy change No. 9</p> <p><b>Policy 9 – Rural Exceptions Sites Affordable housing-led schemes</b></p> <p>Throughout Policy</p> | <p>Development proposals on sites outside of <b>but adjacent to the</b> existing built up areas in <b>of</b> smaller towns, villages and hamlets, whose primary purpose is to provide affordable housing to meet local needs will be supported <b>where they are clearly affordable led and would</b> be well related to the <b>physical form of the</b> settlement and appropriate in scale, character and appearance.</p> <p><del>Proposals should be developed in accordance with guidance provided in the Affordable Housing SPD. The number, type, size and tenure of dwellings should reflect identified local needs as evidenced through the Cornwall housing register or any specific local surveys completed using an approved methodology. as detailed in the SPD.</del></p> <p><b>The purpose of such developments must be to provide a majority of the development as affordable housing. While the purpose of such developments should be to provide affordable local needs housing, The inclusion of market housing in such proposals will <i>only</i> be supported where; <i>the Council is satisfied it is essential for the successful delivery of the development based on detailed financial appraisal (For example to fund abnormal development costs or to deliver a balanced, sustainable community).</i></b></p> <p><del>i) It can demonstrate it meets a local need for housing; and</del></p> <p><del>ii) The Council is satisfied it is essential for the successful delivery of the development (For example to fund abnormal development costs or to deliver a balanced, sustainable community); and</del></p> |

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|  | <p>iii) <del>It has the support of the local community measured by the level of support received from the parish council, a positive outcome from a local referendum or where there is evidence that it is a community led proposal; and</del></p> <p>iv) <del>Market housing does not represent more than 50% of the homes or 50% of the land take, excluding infrastructure and services.</del></p> <p>The Council will secure the first and future occupation of the affordable homes to those with a housing need and local connection to the settlement or parish in line with the Council’s adopted local connection policies.</p> |
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2.2.10 This is essentially a development management policy relating to residential development proposals on sites outside of but adjacent to the existing built up areas in of smaller towns, villages and hamlets. It is noted that new residential development identified within this policy does provide for impact pathways linking to internationally designated sites. However, this policy does not identify any quantum or location of residential development. As such there are no impact pathways present and this policy can be screened out from further consideration.

**Table 9: Policy change No. 10**

| Policy change No., Policy Number, and Location of Change                                | Proposed Change   |
|---|---|
| Policy change No. 10<br><br><b>Policy 10 – Publicly owned sites</b><br><br>Whole Policy | <p><del>On sites within the ownership of the public sector or sites which were previously owned by the public sector (but have been disposed of for the purpose of redevelopment) but which had a public sector use or ownership immediately prior to disposal, the Council will seek to negotiate an element of affordable housing to a target of 50% of the development</del></p> |

2.2.11 This policy text has been removed in its entirety as per Inspector recommendations. There are no impact pathways present.

**Table 10: Policy change No. 11**

| Policy change No., Policy Number, and Location of Change                                   | Proposed Change   |
|--|---|
| Policy change No. 11<br><br><b>Policy 11 – Managing viability</b><br><br>Throughout Policy | <p>Where the Council is satisfied through the submission of appropriate evidence that the proposal cannot deliver the full quota of affordable housing without affecting the viability of the scheme to such an extent that it cannot proceed, it will <b>consider whether the following approaches would assist in</b> <del>adopt the following sequential approach with the aim of securing the maximum contribution to affordable housing achievable;</del></p> <ol style="list-style-type: none"> <li><del>1. The alteration of the housing mix to reduce scheme costs.</del> <b>Securing public subsidy or other commuted sums, recognising that this may result in further changes to scheme mix and the delivery timescales;</b></li> <li><del>2. Securing public subsidy or other commuted sums, recognising that this may result in further changes to scheme mix and the delivery timescales.</del> <del>3. The alteration of <b>Flexibility in</b> the affordable housing tenure, <b>type and size</b> mix <b>and/or phasing required</b> within the development;</del></li> <li><b>3. The transfer of free serviced land / plots to the Council reflecting the number of affordable dwellings that would normally be expected for that development;</b></li> <li><b>4. A negotiated reduced percentage of on-site affordable provision;</b></li> </ol> <p><del>4.5. Consideration of an off –site contribution for</del> <b>to enable an</b> improved number or range of affordable housing <b>on another local</b></p> |

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|  | <p><b>site.</b></p> <p>If, after considering the above options, only very limited or no affordable housing can be secured due to market conditions at a particular moment in the economic cycle, the Council will seek other mechanisms within a planning obligation to secure planning gain. These can include (but not be limited to) re-phasing, deferment of affordable housing obligations, options to reappraise the scheme at future phases or at commencement to allow viability to be re-assessed.</p> |
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2.2.12 This is a development management policy relating to the viability of a development and deliverability of affordable housing. There are no impact pathways present linking this policy to an internationally designated site. This policy can be screened out from further consideration.

**Table 11: Policy change No. 13**

| Policy change No., Policy Number, and Location of Change                              | Proposed Change   |
|---|---|
| <p>Policy change No. 13</p> <p><b>Policy 13 – Design</b></p> <p>Throughout Policy</p> | <p>The Council is committed to achieving high quality safe, sustainable and inclusive design in all developments across Cornwall and ensuring its distinctive natural and historic character is maintained and enhanced. Development proposals must <del>show</del> <b>be</b> high quality design and layout of buildings and places <b>and demonstrating demonstrate a design</b> process that has clearly considered the existing context, and <b>how the development</b> contributes to the social, economic and environmental <b>elements of</b> sustainability.</p> <p>1. As part of a comprehensive place-shaping approach, proposals will be judged against fundamental design principles of:</p> <p>a. character – creating places with their own identity and promoting local distinctiveness while not preventing or discouraging appropriate innovation. Being of an appropriate scale, density, layout, height and mass with a clear understanding and response to its landscape, seascape and townscape setting; <b>and</b></p> <p>b. layout – provide continuity with the existing built form and respect and work with the natural and historic environment; high quality safe private and public spaces; and improve perceptions of safety by overlooking of public space; <b>and</b></p> <p>c. movement – creating a network of safe well connected routes which are easy to read and navigate by the use of landmarks, spaces, views and intersections; <b>and</b></p> <p>d. adaptability, inclusiveness, resilience and diversity – building structures can be easily altered, particularly internally, to respond to both climate change and changing social and economic conditions and provide a mix and pattern of uses; <b>and</b></p> <p>e. <b>engagement</b> process – undertaking community engagement, involvement and consultation in the design process proportionate to the scheme.</p> <p>2. In addition development proposals should protect individuals and property from:</p> <p>a. overlooking and unreasonable loss of privacy; <b>and</b></p> <p>b. overshadowing and overbearing impacts; <b>and</b></p> <p>c. unreasonable noise and disturbance.</p> <p><del>3. For larger developments a balance needs to be achieved between private, semi-private and public open space which includes allotments, sports facilities, children’s play area provision and natural open space provision. The Council will seek the provision of larger areas of multifunctional green space rather than multiple smaller areas as appropriate in larger developments.</del></p> |

2.2.13 This is a development management policy relating to development design. There are no impact pathways present linking this policy to an internationally designated site. This policy can be screened out from further consideration.

**Table 12: Policy change No. 14**

| Policy change No., Policy Number, and Location of Change  | Proposed Change   |
|---|---|
| <p>Policy change No. 14</p> <p><b>Policy 14: Development standards</b></p> <p>Throughout Policy</p> | <p>All new development will be expected to achieve the provision of the following:</p> <ol style="list-style-type: none"> <li><b>1. Sufficient internal space in housing for everyday activities and to enable flexibility and adaptability by meeting nationally described space standards (Building Regulations Approved Document M Volume 1 Category 2: Accessible and adaptable dwellings or successor documents); and</b></li> <li><b>2. Provide Public open space on-site, and in proportion to the scale of the development and providing for different typologies of open space based on local need.</b> Where there is access to alternative facilities <i>that would meet the needs of the new development</i>, contributions to the ongoing maintenance and management of these alternative facilities may be required <b>as part of a reduced requirement on site; and</b></li> <li><b>3. Provide</b> An appropriate level of off street parking and cycle parking taking into account the accessibility of the location in terms of public transport and proximity to facilities and services; <b>and</b></li> <li><b>4. Demonstrate</b> Sufficient and convenient space for storage for domestic activities and recreation as well as collection of waste, recycling and compostables; <b>and</b></li> <li><b>5. Avoidance of</b> adverse impacts, either individually or cumulatively, resulting from noise, dust, odour, vibration, <b>vermin</b>, waste, pollution and visual effects. Such adverse impacts should be avoided <b>or mitigated</b> during the construction, operation or restoration stage of development; <b>and</b></li> <li><del>5. Include measures to reduce pollution within Air Quality Management Areas and meet air quality objectives, that are proposed by the Local Transport Plan and any Air Quality Action Plans.</del></li> <li><del>6. Take advantage of any opportunities to minimise Minimisation of energy consumption, with an emphasis on improving the fabric of buildings, for example achieving high levels of insulation, use of natural lighting, ventilation, heating and orientation; and This should achieve at least Zero Carbon new builds from 2016 for domestic buildings and from 2019 for non-domestic buildings.</del></li> <li><b>7. Where feasible, connection to an existing or planned heat network. In the absence of an existing or planning heat network development will be expected, where feasible, to provide a site-based heat network, or be designed to facilitate future connection to a heat network.</b></li> <li><del>8.7. Additionally Where feasible, the development of decentralised low carbon heat networks is particularly encouraged to or connection to (or be designed to facilitate future connection to) an existing or planned heat network.</del></li> <li><b>8. Housing developments of 10 dwellings or greater should provide 25% of dwellings as accessible homes.</b></li> </ol> |

2.2.14 This is a development management policy relating to standards of development. This is a positive policy as it encourages the provision of public open space that can aid in drawing recreational pressure away from internationally designated sites. There are no impact pathways present linking this policy to an internationally designated site. This policy can be screened out from further consideration.

Table 13: Policy change No. 15

| Policy change No., Policy Number, and Location of Change  | Proposed Change  |
|---|--|
| <p>Policy change No. 15</p> <p><b>Policy 15: Renewable and low carbon energy</b></p> <p>Throughout Policy</p> | <p>1. To increase use and production of renewable and low carbon energy generation development proposals will be supported that:</p> <ol style="list-style-type: none"> <li>maximise the use of the available resource by deploying installations with the greatest energy output practicable taking into account the provisions of this Plan;</li> <li>make use, or offer genuine potential for use, of any waste heat produced; and</li> <li>in the case of wind turbines they <b>are within an area allocated for wind power and</b> avoid, or adequately mitigate <del>unacceptable</del> shadow flicker, <b>noise</b> and adverse impact on air traffic operations, radar and air navigational installations; <b>and</b></li> <li>do not have an overshadowing or overbearing effect on nearby habitations.</li> <li>in the case of solar development, <del>unacceptable</del> <b>noise</b>, glint and glare is mitigated adequately.</li> </ol> <p>2. <del>Particular</del> Support will be given to renewable and low carbon energy generation developments that:</p> <ol style="list-style-type: none"> <li>are led by, or meet the needs of local communities; <b>and</b></li> <li>create opportunities for co-location of energy producers with energy users, in particular heat, and facilitate renewable and low carbon energy innovation.</li> </ol> <p>3. When considering such proposals, regard will be given to the wider benefits of providing energy from renewable sources, as well as the potential effects on the local environment; including any cumulative impact of these proposals.</p> <p>4. In and adjacent <del>within the setting of</del> Areas of Outstanding Natural Beauty and undeveloped coast, developments <del>would not be allowed except</del> <b>will only be permitted</b> in exceptional circumstances and should generally be very small scale in order that the natural beauty of these areas may be conserved.</p> <p>5. When considering proposals for wind turbines within the setting of the Area of Outstanding Natural Beauty <b>and its setting</b> and / or the World Heritage Site <b>and its setting</b>, the status of these designations shall be taken into account when assessing landscape impact.</p> |

2.2.15 This policy sets out standards for renewable energy. It does not specify type, location of development or extent. As each renewable energy proposal will be assess on its own merits through the development control process, this policy can remain screened out from further consideration.

Table 14: Policy change No. 17

| Policy change No., Policy Number, and Location of Change                  | Proposed Change  |
|---|--|
| <p>Policy change No. 17</p> <p><b>Policy 17: Health and wellbeing</b></p> | <p>To improve the health and wellbeing of Cornwall's communities, residents, workers and visitors, development should:</p> <ol style="list-style-type: none"> <li>Protect, and alleviate risk to, people and the environment from unsafe, unhealthy and polluted environments by avoiding or mitigating against harmful impacts and health risks such as air and noise pollution and water and land contamination and</li> </ol> |

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| Throughout Policy | <p>potential hazards afforded from future climate change impacts; and</p> <p><b>2. Where it affects Air Quality Management Areas, demonstrate that it, singularly or cumulatively, will not cause increased risk to human health from air pollution or exceeding EU standards. Measures proposed to meet this requirement should be aligned with Cornwall's Air Quality Action Plan and Local Transport Plan, aimed at achieving reductions in pollutant emissions and public exposure; and</b></p> <p><b>3. 2–Maximise the opportunity for physical activity through the use of open space, indoor and outdoor sports and leisure facilities and <i>providing or enhancing active</i> travel networks <i>that</i> support <i>and encourage</i> walking, riding and cycling; and</b></p> <p><b>4. 3. Provide <del>where possible dwellings which have</del> easy, safe and secure storage for cycles and other recreational equipment; and</b></p> <p><b>5. 4. Encourage provision for growing local food <del>such as allotments or</del> in private gardens which are large enough to accommodate vegetable growing or greenhouses <i>or through the provision of allotments</i> ; and</b></p> <p><b>6. 5. Provide flexible community <i>open</i> spaces that can be adapted to the health needs of the community and encourage social interaction.</b></p> <p><del>6. Maximise positive health impacts and ensure the mitigation of negative health impacts through the use of Health Impact Assessment for significant major development proposals.</del></p> |
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2.2.16 This policy does not define any quantum or location of development. It relates to health and wellbeing. This is a positive policy as it includes reference to adherence to air quality standards. There are no impact pathways present that link to internationally designated sites, as such this policy can remain screened out.

**Table 15: Policy change No. 18**

| Policy change No., Policy Number, and Location of Change  | Proposed Change   |
|---|---|
| <p>Policy change No. 18</p> <p><b>Policy 18: Minerals - general principles</b></p> <p>Throughout Policy</p> | <p>1. Support will be given to maintain and grow a world class, thriving and sustainable minerals industry in Cornwall which meets local needs as well as exporting minerals, predominantly by rail and sea, to serve regional, national and international markets.</p> <p>2. A sufficient supply of indigenous minerals will be maintained to achieve sustainable and economic growth, whilst encouraging the use of recycled and secondary materials, particularly secondary aggregates from china clay (kaolin) production, to minimise the requirement for new extraction.</p> <p>3. New mineral development, <b>(including extensions to existing sites)</b> of a scale sensitive to its landscape designations, will be supported in the following areas:</p> <p>a. China clay (kaolin) and secondary aggregate extraction in the St Austell (Hensbarrow) China Clay Area;</p> <p><b>b. Primary aggregate extraction outside the AONB;</b></p> <p>b c. throughout Cornwall for:</p> <p>i. Building, roofing, heritage and ornamental stone,</p> |

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|  | <p>ii. Metal and industrial minerals,</p> <p>iii. Primary aggregate development for particular grades of material not provided for by other permitted reserves.</p> <p><i>4. Improved and more efficient working practices at existing minerals sites will be supported.</i></p> <p><b>4 5.</b> Mineral recycling and recovery facilities will be supported where they fall within well screened areas at currently operational quarries and landfill sites.</p> <p><del>5</del> <b>6.</b> Mineral development should have no adverse impact on: slope stability, differential settlement of quarry backfilling, and mining subsidence.</p> <p><del>6</del> <b>7.</b> All mineral development should enable progressive and effective reclamation at the earliest opportunity, <b>taking into account aviation safety</b>, for appropriate and beneficial after-uses that:</p> <p>i. Contribute to and enhance the natural and local environment including, ecosystem services and networks,</p> <p>ii. Conserve and enhance heritage assets and protect and enhance valued landscapes, geological conservation interests and soils,</p> <p>iii. Have the potential for wider community benefits.</p> |
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2.2.17 This policy sets out the general principles to development relating to the mineral industry. It is noted that the minerals industry can result in impact pathways that can link to internationally designated sites. However, this policy does not identify any type, location, or quantum of development. As such there are no impact pathways linking to internationally designated sites present. This policy can remain screened out.

**Table 16: Policy change No. 19**

| Policy change No., Policy Number, and Location of Change  | Proposed Change  |
|---|--|
| <p>Policy change No. 19</p> <p><b>Policy 19: Minerals safeguarding</b></p> <p>Throughout Policy</p> | <p>1. Important mineral resources and reserves and <b>existing, planned and potential</b> associated bulk transport, storage, handling and processing facilities and sites shall be safeguarded from sterilisation by other forms of <b>incompatible</b> development.</p> <p>2. Mineral Safeguarding Areas will be identified for the following minerals resources and reserves;</p> <p>a. aggregates (both primary and secondary),</p> <p>b. china clay,</p> <p>c. building and ornamental stone (including roofing and heritage materials) and</p> <p>d. metals <b>(including relevant shafts and adits)</b>,</p> <p>3. Mineral Safeguarding Areas will be identified for the following <b>existing, planned and potential</b> mineral infrastructure;</p> <p>a. key concrete batching and other products and roadstone coating,</p> |

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|  | <p>b. <b>Storage</b>, handling, processing and distribution of <b>minerals substitute, recycled and secondary aggregate</b>,</p> <p>c. the bulk transport of minerals by rail, sea (ports) or haul roads.</p> <p>The Cornwall Minerals Safeguarding Development Plan will develop detailed policy and identify sites for safeguarding minerals, mineral resources and associated facilities for transport, storage, handling and processing for onward transport by rail or sea. Key sites used for the batching / manufacture of concrete products and coated materials will also be identified for safeguarding as well as sites for processing and the distribution of substitute recycled and secondary aggregate materials. Policy will also be developed to encourage prior extraction where appropriate.</p> |
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2.2.18 This is a development management policy relating to safeguarding of land containing mineral resources so they are not subject to inappropriate development and are safeguarded for future extraction. There are no impact pathways present that have potential to link to an internationally designated site. This policy remains screened out.

**Table 17: Policy change No. 20**

| Policy change No., Policy Number, and Location of Change   | Proposed Change  |
|--|--|
| Policy change No. 20<br><br><b>Policy 20: Strategic waste management principles</b><br><br>Point 4 | <p><b>4. When determining planning applications for non-waste development, the Council will ensure that any likely impact on existing waste facilities (as detailed in the Annual Monitoring Report) is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities.</b></p> |

2.2.19 This change does not provide any impact pathways that have potential to link to internationally designated sites. This policy can remain screened out.

**Table 18: Policy change No. 21**

| Policy change No., Policy Number, and Location of Change   | Proposed Change   |
|--|---|
| Policy change No. 21<br><br><b>Policy 21: Managing the provision of waste management facilities</b><br><br>Point 3 | <p>3. Landfill development shall enable effective site reclamation at the earliest opportunity, <b>taking into account aviation safety</b>, for appropriate end uses.</p> |

2.2.20 The change to Policy 21 does not contain any impact pathways that have potential to link to internationally designated sites. This policy can remain screened out.

**Table 19: Policy change No. 22**

| Policy change No., Policy Number, and Location of Change | Proposed Change   |
|--|---|
| Policy change No. 22                                     | <p>To ensure the best use of land, development proposals should give priority to:</p> |

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| <p><b>Policy 22: Best use of land and existing buildings</b></p> <p>Throughout Policy</p> | <p>a. <b>using</b> previously developed land and buildings provided that they are not of high environmental <b>or historic</b> value; <b>or</b></p> <p>b. <b>using</b> despoiled, degraded, derelict and contaminated land provided that it is not of high environmental value; <b>or</b></p> <p>c. the subdivision of properties, the reuse or conversion of existing vacant properties and <b>increasing</b> building density that will ensure an efficient use of land; <b>and</b></p> <p>d. the safeguarding of Grade 1, 2 and 3a agricultural land for food production (and where reasonable alternatives for development can be identified, the safeguarding of grade 3b agricultural land); <b>and</b></p> <p>e. the safeguarding of land, <b>where it is identified to be functional flood storage</b>, to make space for water at times of flood.</p> |
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2.2.21 This is a development management policy, setting criteria for the best use of land. It does not identify any location, type or quantity of development. It is a positive policy in that it provides protection for areas of functional flood storage. This policy can remain screened out.

**Table 20: Policy change No. 22A**

| Policy change No., Policy Number, and Location of Change  | Proposed Change   |
|---|---|
| <p>Policy change No. 22A</p> <p><b>Policy 22A: Protection of the countryside</b></p> <p>Throughout Policy</p> | <p><del>In order to prevent the unnecessary loss of previously undeveloped countryside, proposals will only be permitted where they would not have a significant adverse impact on its biodiversity, its beauty, diversity of landscape and seascape, the character and setting of settlements, the wealth of its natural resources, its nature conservation and agricultural, historic and recreational value.</del></p> <p><del>• can show that existing urban capacity and allocated land cannot meet the identified local need; and / or</del></p> <p><del>• have no significant adverse impact upon biodiversity, its beauty, diversity of landscape and seascape, the character and setting of settlements, the wealth of its natural resources, agricultural, historic and recreational value.</del></p> |

2.2.22 This policy provided protection for development within the countryside. This policy is now deleted. It has been replaced with text within Policy 2. This change can be screened out.

**Table 21: Policy change No. 23a**

| Policy change No., Policy Number, and Location of Change  | Proposed Change  |
|---|--|
| <p>Policy change No. 23a</p> <p><b>Policy 23a: European Protected Sites</b></p> <p>Whole Policy</p> | <p><b><i>The highest level of protection will be given to potential, candidate and existing Special Protection Areas, and possible, candidate and existing special Areas of Conservation and Ramsar sites.</i></b></p> <p><b><i>Proposals having an adverse impact on the integrity of such areas that cannot be avoided or adequately mitigated to remove any adverse effect will not be permitted other than in exceptional circumstances. These circumstances will only apply where there are:</i></b></p> <p><b><i>a) no alternatives;</i></b></p> <p><b><i>b) imperative reasons of overriding public interest; and</i></b></p> <p><b><i>c) necessary compensatory provision can be secured.</i></b></p> <p><b><i>Mitigation:</i></b></p> <p><b><i>This will include provision of appropriate buffer areas as set out in figure 6, and as informed by emerging evidence base,</i></b></p> |

**and site management based on up-to-date evidence and management plans.**

**1. Development will only be permitted where the Council is satisfied that any necessary mitigation is included such that, in combination with other development, there will not be adverse effects on the integrity of European Nature Conservation Sites.**

**2. For residential development, the required suite of mitigation measures relating to the European Nature Conservation Sites in figure 6 consists of a combination of the following measures:**

**(a) Access and Visitor Management: measures to manage the number of recreational visits to the European sites in figure 6; and to modify visitor behaviour within those sites so as to reduce the potential for harmful recreational impacts.**

**(b) Monitoring of the impacts of new development on the European Nature Conservation Sites shown in figure x and establishing a better evidence base: to reduce uncertainty and inform future refinement of existing management plans and mitigation measures.**

**To achieve these mitigation measures, all residential development within the zones shown in figure 6 and as informed by the emerging evidence base, that result in additional dwellings will be required to provide for appropriate management, mitigation and/or financial contributions towards off-site mitigation. This will need to be agreed and secured prior to approval of the development.**

**The required level of contributions (to be set out in more detail in the Mitigation Strategy Supplementary Planning Document) will be based on x/y where:**

**X = the assessed overall costs of the package of mitigation measures set out in (a) and (b) above needed to offset potentially harmful visits to the European Nature Conservation Sites, and  
Y = the number of contributing dwellings (having regard also to the size of dwelling).**

**In addition, all residential developments within the zones shown in figure 6 will be required to contribute towards monitoring.**

2.2.23 This is a positive Policy change and a key change. This Policy change is the insertion of a new policy dedicated to the protection of internationally designated sites (including proposed sites, not yet formally designated). It provides for suitable 'buffer areas' within which 'all residential development within the zones shown in figure 6 and as informed by the emerging evidence base, that result in additional dwellings will be required to provide for appropriate management, mitigation and/or financial contributions towards off-site mitigation. This will need to be agreed and secured prior to approval of the development.' This policy acknowledges that at the time of writing, not all evidence was available to fully inform the requirements for mitigation measures (e.g. visitor surveys). Some of the results of this survey work are now available and are discussed later in this report. This policy provides explicit protection for internationally designated sites via the following text 'Development will only be permitted where the Council is satisfied that any necessary mitigation is included such that, in combination with other development, there will not be adverse effects on the integrity of European Nature Conservation Sites'. Whilst this policy does not identify the need for Habitats Regulations Assessment, it implies the requirement for any project that has the potential to result in a likely significant effect upon an internationally designated site to undertake Habitats Regulations Assessment. Further to this, the policy outlines the requirement for access and visitor management and monitoring of designated sites to ensure development within Cornwall does not result in likely significant effects upon an internationally designated site. It also implies that following monitoring, if any effects are detected, then current management plans and mitigation measures can be refined. There are no impact pathways present that could result in a likely significant effect upon an internationally designated site. This policy can be screened out from further consideration.

Table 22: Policy change No. 23

| Policy change No., Policy Number, and Location of Change  | Proposed Change  |
|---|--|
| <p>Policy change No. 23</p> <p><b>Policy 23: Natural environment</b></p> <p>Throughout Policy</p> | <p>Development proposals <del>will need to</del> <b>should</b> sustain local distinctiveness and character and protect and enhance Cornwall's natural environment and assets according to their international, national and local significance through the following measures;</p> <p>1. Cornish Landscapes</p> <p>Development should be of an appropriate scale, mass and design <del>which</del> <b>that</b> recognises and respects landscape character of both designated &amp; un-designated landscapes. Development must take into account and respect the sensitivity and capacity of the landscape asset, considering cumulative impact and the wish to maintain dark skies and tranquillity in areas that are relatively undisturbed, using guidance from the Cornwall Landscape Character Assessment and supported by the descriptions of Areas of Great Landscape Value.</p> <p>In areas of undeveloped coast, outside main towns, only development requiring a coastal location, and that cannot be achieved elsewhere, will be acceptable.</p> <p>2. The Cornwall and Tamar Valley Area of Outstanding Natural Beauty</p> <p><del>Great weight will be given to conserving the landscape and scenic beauty</del> Ensuring that any proposals within the AONB or affecting its <del>the</del> setting <b>of the AONB. Proposals must</b> conserve and enhance the <b>landscape character and</b> natural beauty and special qualities of the AONB; provide only for an identified local need and is be appropriately located to address the AONB's sensitivity and capacity. <b>Proposals should be informed by</b> and <b>assist the delivery of</b> <del>delivers</del> the objectives of the Cornwall and Tamar Valley AONB Management Plans including the interests of those who live and / or work in them.</p> <p><b>3. The Heritage Coast and Areas of Great Landscape Value</b></p> <p><b>Development within the Heritage Coast and / or Areas of Great Landscape Value should maintain the character and distinctive landscape qualities of such areas.</b></p> <p>3 4. Terrestrial and Marine Biodiversity and Geodiversity</p> <p>Specifically ensuring that with direct and cumulative impact;</p> <p><del>a. international, national and locally designated sites for nature conservation are safeguarded from inappropriate development to a level commensurate with the status of their designation.</del></p> <p><b>a. b. features and locally designated sites</b> of biological or geological interest (including Biodiversity Action Plan habitats and species, and soils <b>SINCs and RIGS</b>), are conserved, protected and enhanced and there is <b>or full</b> provision for their appropriate <b>restoration, recreation and</b> management, <b>and that priority species are protected and recovered.</b></p> <p><b>b. c. there is no net loss of existing biodiversity and enable a net gain in biodiversity by designing in biodiversity, and ensuring any unavoidable impacts are appropriately mitigated and / or compensated for. This must ensure</b> d. the importance of habitats identified in the South West Regional Nature Map <b>are considered</b> and the creation of a local and regional biodiversity network of wildlife corridors and local wildlife sites, helping to deliver the actions set out in the Cornwall Biodiversity Action Plan are recognised.</p> |

|  |   |
|--|---|
|  | <p><b>Mitigation</b></p> <p>Where development will result in adverse impact, the council will require appropriate and proportionate mitigation and / or compensation such as replacement habitats. <b>Wherever possible enhancement for biodiversity should also be provided.</b></p> |
|--|---|

2.2.24 This contains positive Policy changes, enhancing protection for the natural environment. There are no impact pathways linked to internationally designated sites. This policy can remain screened out.

**Table 23: Policy change No. 24**

| Policy change No., Policy Number, and Location of Change   | Proposed Change   |
|--|---|
| <p>Policy change No. 24</p> <p><b>Policy 24: Historic environment</b></p> <p>Throughout Policy</p> | <p>Development proposals will need <b>should</b> to sustain <b>the cultural distinctiveness of Cornwall's historic environment</b>, local distinctiveness and character and <b>by protecting, conserving and where possible and enhancing</b> Cornwall's historic environment and assets according to their international, national and local significance through the following measures:</p> <p>a. <del>Protect, conserve and enhance the historic environment of Designated and undesignated heritage assets and their settings, including historic landscapes, settlements, Conservation Areas, marine environments, archaeological sites, parks and gardens and historic buildings.</del> <b>will be conserved, and where appropriate enhanced in a manner appropriate to their significance including:</b></p> <ul style="list-style-type: none"> <li><b>i. Preservation of Scheduled monuments</b></li> <li><b>ii. Impact and evaluation on sites of known or potential archaeological interest</b></li> <li><b>iii. Listed buildings and structures of special architectural or historic interest</b></li> <li><b>iv. The special character or appearance of conservation areas</b></li> <li><b>v. Design, character and appearance of Historic parks and gardens</b></li> <li><b>vi. Important landscapes, including registered battlefields, townscapes and locally important heritage assets</b></li> <li><b>vii. Marine environments, including protected wreck sites; and.</b></li> </ul> <p>b. <del>Protecting, enhancing and promoting</del> the outstanding universal value (<b>OUV</b>) of the World Heritage Site and its setting; <del>supporting</del> <b>in accordance with</b> the adopted Management Plan <b>by:</b></p> <ul style="list-style-type: none"> <li><b>i. Giving precedence to the protection of the World Heritage Site and its setting</b></li> <li><b>ii. Development not adversely affecting the World Heritage Site and its attributes of OUV</b></li> <li><b>iii. Seeking opportunities to support and maintain the positive management of the World Heritage Site through development</b></li> <li><b>iv. Requiring developments to demonstrate that full account has been taken of their impact upon the World Heritage Site and its setting</b></li> </ul> <p><b>All development proposals</b> should be informed by proportionate historic environment assessments and evaluations. <b>Where development is proposed that would lead to substantial harm to assets of the highest significance or substantial harm to all other nationally designated assets this should be exceptional and fully justified. In all cases any harm to heritage assets should be justified and weighed against the public benefits of the proposal.</b></p> <p><b>Where less than substantial harm would result from a development affecting a heritage asset of moderate significance the council will weigh that harm against the public, not the private, benefits of that proposal.</b> In exceptional circumstances where the balance of a decision in favour of development results in the harm of a heritage asset <b>these cases</b> the council will require</p> |

appropriate and proportionate mitigation by using planning conditions, management agreements and obligations.

2.2.25 The Policy changes do not contain any impact pathways that link to internationally designated sites. This policy can remain screened out.

**Table 24: Policy change No. 25**

| Policy change No., Policy Number, and Location of Change   | Proposed Change   |
|--|---|
| <p>Policy change No. 25</p> <p><b>Policy 25: Green infrastructure</b></p> <p>Throughout Policy</p> | <p><b><i>The existing green infrastructure network in Cornwall, which is important to recreation, leisure, community use, townscape and landscape quality and visual amenity will be protected and enhanced. Development proposals should contribute to an enhanced</i></b> <del>To protect and enhance a diverse, connected and functional network of <b>habitat</b>, open spaces and waterscapes <b>through:</b></del><br/>                     Development proposals should:</p> <ol style="list-style-type: none"> <li>1. 2. Retain<b>ing</b> and enhance<b>ing</b> the most important environmental infrastructure assets and connections <del>that which</del> contribute to the functionality of networks of ecosystems and connections <del>our Strategic Environmental Infrastructure network</del> in their existing location; <b>and</b></li> <li>2. 4. Demonstrate<b>ing</b> that all the functional environmental infrastructure and connections have been taken into account <b>in the design of the scheme or site layout</b> including <b>impacts on</b> ecosystem services; biodiversity; coastal processes; and recreation within and near to the application site and show how this understanding has positively <b>contributed to place making and</b> influenced the proposal; <b>and</b></li> <li>3. Provide<b>ing</b> appropriate buffers to natural spaces <b>that have community, biodiversity and heritage significance</b>; and</li> <li>4. Restore<b>ing</b> or enhance<b>ing</b> connectivity for nature and people through the site and linking to adjacent sites <b>or green routes, helping to provide better links between urban and rural landscapes and coastal areas, creating accessible and attractive places for communities to make regular contact with the natural environment; and</b></li> <li>5. Provide<b>ing accessible and</b> good quality and accessible open <b>space</b> and <b>where applicable improved access to</b> coastal space; <b>and</b></li> <li>6. 7. Provide<b>ing</b> clear arrangements for the long-term maintenance and management <del>that supports</del> <b>and/or enhancement of</b> the green infrastructure <b>assets and for transport routes.</b></li> <li>7. 6. In exceptional circumstances where retention of the most important green infrastructure assets and connections is outweighed by the benefits arising from the development proposals and they cannot be retained on site, the loss resulting from the proposed development should be replaced by equivalent or better provision in terms of quantity, <del>and</del> quality <b>and ecological or open space value that enhances the provision of ecosystem services</b> in a suitable location.</li> </ol> |

2.2.26 This Policy change does not contain any detrimental impact pathways that link to internationally designated sites. The presence of functional green infrastructure can be used to draw recreational pressure away from sensitive internationally designated sites. This policy can remain screened out.

Table 25: Policy change No. 26

| Policy change No., Policy Number, and Location of Change   | Proposed Change   |
|--|---|
| <p>Policy change No. 26</p> <p><b>Policy 26: Flood risk management and coastal change</b></p> <p>Throughout Policy</p> | <p>1. Development should take account of <b>and be consistent with</b> any adopted strategic and local flood and coastal management strategies.</p> <p>2. Development should be sited, designed, of a type and where necessary relocated in a manner that:</p> <p>a. increases flood resilience of the area, taking account of the area's vulnerability to the impacts of climate change and coastal change and the need to avoid areas of flood risk, <del>where possible</del>, in the first instance, <b>taking into account the vulnerability of the use proposed; and</b></p> <p>b. minimises, <b>or</b> reduces <b>and where possible, eliminates</b> flood risk on site and in the area; <b>and</b></p> <p>c. enables <del>/</del> <b>or</b> replicates natural <b>ground and surface</b> water flows and decreases surface water runoff , particularly in Critical Drainage Areas, through sustainable urban drainage systems (SUDS), utilising green infrastructure where possible and as guided by local standards, including Cornwall drainage guidance; <b>and</b></p> <p><del>d. is consistent with the policies and actions in the Shoreline Management Plan and Catchment Flood Management Plans for Cornwall and the South West River Basin Management Plan the national Marine Policy Statement is the framework for taking decisions affecting the marine environment and the planned South West Marine Inshore and Offshore Plans will augment this;</del></p> <p><b>d. e. where applicable,</b> supports community-led local solutions to managing flood risk and coastal change; and</p> <p><b>e. f.</b> does not create avoidable future liability for maintenance for public bodies and communities.</p> <p>3. Development proposals of 10 dwellings or more or over 0.5 ha should provide a long term water management plan, which includes maintenance of surface water drainage systems, measures to improve the network of surface water drainage systems on and around the site (e.g. culverts etc) and identifies opportunities <b>and funding</b> for future enhancement.</p> |

2.2.27 Changes to this policy do not contain impact pathways that link to internationally designated sites. This policy can remain screened out.

Table 26: Policy change No. 27

| Policy change No., Policy Number, and Location of Change  | Proposed Change  |
|---|--|
| <p>Policy change No. 27</p> <p><b>Policy 27: Transport and accessibility</b></p> <p>Throughout Policy</p> | <p><b>For major developments</b> to ensure a resilient and reliable transport system for people, goods and services, development proposals should:</p> <p>1. Be consistent with and contribute to the delivery of Connecting Cornwall 2030, Cornwall's Local Transport Plan or any subsequent LTPs; <b>and</b></p> <p>2. Locate development and / or incorporate a mix of uses so that the need to travel will be minimised and the use of sustainable transport modes can be maximised by prioritising safe access by walking, cycling and public transport <del>and providing new facilities and services to minimise car travel;</del> <b>and</b></p> |

|  |   |
|--|---|
|  | <p>3. Locate <b>larger</b> developments which attract a proportionally larger number of people in the city and main towns or locations which are highly accessible by public transport <del>or areas which will be made highly accessible by the development</del>. Any proposals which do not accord with this will require significant justification and provide clear transport benefits; <b>and</b></p> <p>4. Be designed to provide convenient accessible and appropriate cycle and pedestrian routes, public transport and road routes within and in the <b>immediate</b> vicinity of the development; <del>The inclusion of electric vehicle charging infrastructure and real time passenger information / journey planning will be considered favourably and</del></p> <p>5. Be accompanied with <b>by an</b> effective travel plans <b>that delivers hard and soft measures to support new occupants in adopting sustainable travel habits</b>; <del>to mitigate the impact of development and</del></p> <p>6. <b>Provide safe and suitable access to the site for all people and</b> not <b>cause a</b> significantly adversely impact on the local or strategic road network that cannot be managed or mitigated; <b>and</b></p> <p>7. Safeguard <b>land for the delivery of</b> strategic transport opportunities including land around existing facilities to allow for expansion and use for future sustainable modes of travel e.g. closed branch rail lines and links to the Isles of Scilly. <del>and</del></p> <p>8. <del>Provide public transport solutions including park and ride where there is evidence that it will remove traffic from the highway network, is economically viable and that which accord with the appropriate transport strategy for the area.</del></p> |
|--|---|

2.2.28 The changes to this policy do not contain impact pathways that link to internationally designated sites. This policy can remain screened out.

Table 27: Policy change No. 28

| Policy change No., Policy Number, and Location of Change                                      | Proposed Change  |
|---|--|
| <p>Policy change No. 28</p> <p><b>Policy 28 – Infrastructure</b></p> <p>Throughout Policy</p> | <p><b><i>Developer contributions will be sought to ensure that the necessary physical, social, economic and green infrastructure is in place to deliver development. Contributions will be used to provide or enhance local infrastructure that is adversely affected by the development of a site but which will not be delivered on that site.</i></b></p> <p><b><i>Development will be permitted where:</i></b></p> <ol style="list-style-type: none"> <li>1. <del>New development must</del> <b><i>It would</i></b> be supported by appropriate infrastructure provided in a timely manner. <del>The Council will continue to work in partnership with infrastructure providers and other delivery agencies to keep an up to date infrastructure delivery plan that will enable proposals, in accordance with the spatial objectives, to be brought forward. and</del></li> <li>2. <del>Developer contributions, as a Community Infrastructure Levy and based on the strategic viability assessment, will be sought to ensure that the necessary physical, social, economic and green infrastructure is in place to deliver development. Contributions will be used to provide or enhance local infrastructure that is adversely affected by the development of a site but which will not be delivered on that site.</del></li> <li>2. <del>3.</del> <del>Developers will, in addition, be required to</del> Provide <b>s</b> on-site mitigation measures or make <b>s</b> financial contributions for site specific infrastructure provision not in the Regulation 123 list, including maintenance and management contributions, to be negotiated on a site-by-site basis.</li> <li>3. 4. Unless it can be demonstrated that it is not feasible to do so, the Council will seek to ensure all ‘allowable solutions’ or ‘biodiversity off setting’ payments are invested in projects within Cornwall with priority given to projects which achieve multiple</li> </ol> |

benefits.

2.2.29 Changes to this policy ensure that this is a positive policy. It outlines the need for developer contributions to ensure that ‘*the necessary physical, social, economic and green infrastructure is in place to deliver development. Contributions will be used to provide or enhance local infrastructure that is adversely affected by the development of a site but which will not be delivered on that site.*’ This includes for infrastructure relating to ensure that no likely significant effects impact upon internationally designated sites.

### 2.3 Further Significant Change with Potential to Result in Likely Significant Effects

2.3.1 From an initial sieve of the changes to the Local Plan Strategic Policies, there are three Policies that were modified that have the potential to result in likely significant effects upon internationally designated sites.

2.3.2 These were: Change No: 2a (Policy 2a: Key targets) (see Table 28), Change No: 3 (Policy 3: Role and function of places) (See Table 30), and Change No.12 (Policy 12: Gypsies, Travellers and Travelling Showpeople) (see Table 31). These changes are outlined in the following tables along with a brief narrative detailing how these changes have the potential to result in likely significant effect upon internationally designated sites. Discussion and further assessment for the changes to policies 2a, 3 and 12 in relation to specific internationally designated sites and specific site sensitives will be undertaken within Chapters 3-6.

**Table 28: Policy change No. 2a**

| Policy change No., Policy Number, and Location of Change      | Proposed Change   |                    |                                |                                     |
|---|---|--------------------|--------------------------------|-------------------------------------|
| Policy change No. 2a<br>Policy 2a - Key targets<br>New Policy | <p><b><i>The Local Plan will provide homes in a proportional manner where they can best meet need and sustain the role and function of local communities and that of their catchment. Development proposals in the period to 2030 should help to deliver:</i></b></p> <ol style="list-style-type: none"> <li><b><i>1. 52,500 homes over the plan period at an average rate of about 2,625 per year to 2030 to help deliver sufficient new housing of appropriate types to meet future requirements. In particular, meeting affordable housing needs; and</i></b></li> <li><b><i>2. at least 318 permanent pitches for Gypsies and Travellers, 60 transit pitches and 11 plots for Travelling Showpeople; and</i></b></li> <li><b><i>3. Provide for 38,000 full time jobs over the Plan period and 704,000 sq. metres of employment floorspace over the plan period to help deliver a mix of 359,583 sq. metres of B1a office and 344,417 sq. metres of B1, B2 and B8 industrial premises.</i></b></li> <li><b><i>4. The provision of bed spaces within purpose-built student accommodation commensurate with the scale of expansion of the university in Falmouth with Penryn.</i></b></li> </ol> |                    |                                |                                     |
|   | Location  | Housing Allocation | B1 employment floorspace sq. m | Other B employment floorspace sq. m |

|  |                     |                      |                      |
|--|---------------------|----------------------|----------------------|
| <b><i>Penzance with Newlyn, Heamoor, Gulval and Longrock</i></b> | <b><i>2,150</i></b> |                      |                      |
| <b><i>West Penwith CNA residual</i></b>                          | <b><i>1,000</i></b> |                      |                      |
| <b><i>CNA Total</i></b>  | <b><i>3,150</i></b> | <b><i>16,083</i></b> | <b><i>16,083</i></b> |
| <b><i>Hayle</i></b>  | <b><i>1,600</i></b> |                      |                      |
| <b><i>St Ives with Carbis Bay</i></b>                            | <b><i>1,100</i></b> |                      |                      |
| <b><i>Hayle and St Ives CNA residual</i></b>                     | <b><i>480</i></b>   |                      |                      |
| <b><i>CNA Total</i></b>  | <b><i>3,180</i></b> | <b><i>19,083</i></b> | <b><i>19,083</i></b> |
| <b><i>Helston</i></b>  | <b><i>1,200</i></b> |                      |                      |
| <b><i>Helston and the Lizard CNA residual</i></b>                | <b><i>1,100</i></b> |                      |                      |
| <b><i>CNA Total</i></b>  | <b><i>2,300</i></b> | <b><i>12,417</i></b> | <b><i>17,000</i></b> |
| <b><i>Camborne, Pool, Illogan &amp; Redruth</i></b>              | <b><i>5,200</i></b> |                      |                      |
| <b><i>CPR CNA residual</i></b>                                   | <b><i>1,000</i></b> |                      |                      |
| <b><i>CNA Total</i></b>  | <b><i>6,200</i></b> | <b><i>80,833</i></b> | <b><i>41,417</i></b> |
| <b><i>Falmouth-Penryn</i></b>                                    | <b><i>2,800</i></b> |                      |                      |
| <b><i>Falmouth and Penryn CNA residual</i></b>                   | <b><i>600</i></b>   |                      |                      |
| <b><i>CNA Total</i></b>  | <b><i>3,400</i></b> | <b><i>25,750</i></b> | <b><i>21,667</i></b> |
| <b><i>Truro with Threemilestone and Shortlanesend</i></b>        | <b><i>4,200</i></b> |                      |                      |
| <b><i>Truro and Roseland CNA residual</i></b>                    | <b><i>1,200</i></b> |                      |                      |

|   |              |               |               |
|---|--------------|---------------|---------------|
| <b>CNA Total</b>                                      | <b>5,400</b> | <b>38,333</b> | <b>31,250</b> |
| <b>St Agnes</b>                                       | <b>280</b>   |               |               |
| <b>Perranporth</b>                                    | <b>305</b>   |               |               |
| <b>St Agnes &amp; Perranporth CNA residual</b>        | <b>510</b>   |               |               |
| <b>CNA Total</b>                                      | <b>1,100</b> | <b>15,167</b> | <b>9,333</b>  |
| <b>Newquay</b>  | <b>3,800</b> |               |               |
| <b>Newquay and St Columb CNA residual</b>             | <b>600</b>   |               |               |
| <b>CNA Total</b>                                      | <b>4,400</b> | <b>27,750</b> | <b>30,250</b> |
| <b>Eco-Community</b>                                  | <b>1,500</b> |               |               |
| <b>St Austell</b>                                     | <b>2,600</b> |               |               |
| <b>St Austell CNA residual</b>                        | <b>300</b>   |               |               |
| <b>CNA Total</b>                                      | <b>2,900</b> | <b>9,750</b>  | <b>12,500</b> |
| <b>St Blazey/Par</b>                                  | <b>460</b>   |               |               |
| <b>Lostwithiel</b>                                    | <b>185</b>   |               |               |
| <b>St Blazey, Fowey and Lostwithiel CNA remainder</b> | <b>260</b>   |               |               |
| <b>CNA Total</b>                                      | <b>900</b>   | <b>11,833</b> | <b>13,500</b> |
| <b>Roche</b>  | <b>210</b>   |               |               |
| <b>St Dennis</b>                                      | <b>185</b>   |               |               |

|   |              |               |               |
|---|--------------|---------------|---------------|
| <b><i>Indian Queens with St Columb Road &amp; Fraddon</i></b> | <b>315</b>   |               |               |
| <b><i>St Stephen</i></b>                                      | <b>175</b>   |               |               |
| <b><i>China Clay CNA remainder</i></b>                        | <b>920</b>   |               |               |
| <b><i>CNA Total</i></b>                                       | <b>1,800</b> | <b>13,250</b> | <b>13,000</b> |
| <b><i>Wadebridge</i></b>                                      | <b>1,100</b> |               |               |
| <b><i>Wadebridge and Padstow CNA residual</i></b>             | <b>1,100</b> |               |               |
| <b><i>CNA Total</i></b>                                       | <b>2,200</b> | <b>6,667</b>  | <b>6,667</b>  |
| <b><i>Bodmin</i></b>  | <b>3,000</b> |               |               |
| <b><i>Bodmin CNA residual</i></b>                             | <b>200</b>   |               |               |
| <b><i>CNA Total</i></b>                                       | <b>3,200</b> | <b>22,833</b> | <b>24,667</b> |
| <b><i>Camelford</i></b>                                       | <b>315</b>   |               |               |
| <b><i>Camelford CNA remainder</i></b>                         | <b>685</b>   |               |               |
| <b><i>CNA Total</i></b>                                       | <b>1,000</b> | <b>3,917</b>  | <b>3,917</b>  |
| <b><i>Bude with Stratton, Flexbury and Poughill</i></b>       | <b>1,200</b> |               |               |
| <b><i>Bude CNA residual</i></b>                               | <b>600</b>   |               |               |
| <b><i>CNA Total</i></b>                                       | <b>1,800</b> | <b>10,583</b> | <b>10,583</b> |
| <b><i>Launceston</i></b>                                      | <b>1,900</b> |               |               |
| <b><i>Launceston CNA residual</i></b>                         | <b>500</b>   |               |               |

|  |                                       |               |                |                |
|--|---------------------------------------|---------------|----------------|----------------|
|  | <b>CNA Total</b>                      | <b>2,400</b>  | <b>14,083</b>  | <b>28,167</b>  |
|  | <b>Liskeard</b>                       | <b>1,400</b>  |                |                |
|  | <b>Liskeard and Looe CNA residual</b> | <b>1,500</b>  |                |                |
|  | <b>CNA Total</b>                      | <b>2,900</b>  | <b>20,667</b>  | <b>23,667</b>  |
|  | <b>Callington</b>                     | <b>480</b>    |                |                |
|  | <b>Caradon CNA remainder</b>          | <b>520</b>    |                |                |
|  | <b>CNA Total</b>                      | <b>1,000</b>  | <b>3,667</b>   | <b>11,083</b>  |
|  | <b>Saltash</b>                        | <b>1,200</b>  |                |                |
|  | <b>Torpoint</b>                       | <b>350</b>    |                |                |
|  | <b>Cornwall Gateway CNA residual</b>  | <b>350</b>    |                |                |
|  | <b>CNA Total</b>                      | <b>1,900</b>  | <b>6,917</b>   | <b>10,583</b>  |
|  | <b>TOTAL:</b>                         | <b>52,500</b> | <b>359,583</b> | <b>344,417</b> |

2.3.3 The change in the quantum of housing illustrated within Policy 2a can be seen in detail in Table 29:

**Table 29: (Table 1) Broad distribution of new dwellings will be a minimum of (Change No. 18):**

| Location   | Target Housing Provision 2010-2030 |
|--|------------------------------------|
| Penzance <i>with</i> Newlyn, <b>Heamoor, Gulval and Longrock</b> | 2,150                              |
| <i>West Penwith CNA residual</i>                                 | 1,000                              |
| Hayle  | <del>4,400</del> <b>1,600</b>      |
| St Ives <i>with</i> Carbis Bay                                   | <del>4,000</del> <b>1,100</b>      |
| <i>Hayle and St Ives CNA residual</i>                            | <del>350</del> <b>480</b>          |
| Helston  | <del>900</del> <b>1,200</b>        |
| <i>Helston and the Lizard CNA residual</i>                       | 1,100                              |

|   |                               |
|---|-------------------------------|
| CPIR  | <del>4,500</del> <b>5,200</b> |
| <i>CPR CNA residual</i>                                   | <del>800</del> <b>1,000</b>   |
| Falmouth <b>with</b> Penryn                               | <del>2,600</del> <b>2,800</b> |
| <i>Falmouth and Penryn CNA residual</i>                   | <del>500</del> <b>600</b>     |
| Truro <b>with</b> Threemilestone <b>and</b> Shortlanesend | <del>3,000</del> <b>4,200</b> |
| <i>Truro and Roseland CNA residual</i>                    | <del>900</del> <b>1,200</b>   |
| <b>St Agnes</b>   | <b>280</b>                    |
| <b>Perranporth</b>  | <b>305</b>                    |
| St Agnes and Perranporth CNA <b>residual</b>              | <del>4,100</del> <b>510</b>   |
| Newquay   | <del>3,550</del> <b>3,800</b> |
| <i>Newquay and St Columb CNA residual</i>                 | <del>600</del>                |
| Eco-Community   | <del>2,300</del> <b>1,500</b> |
| St Austell  | <del>2,000</del> <b>2,600</b> |
| <i>St Austell CNA residual</i>                            | <del>300</del>                |
| <b>St Blazey/Par</b>                                      | <b>460</b>                    |
| <b>Lostwithiel</b>  | <b>185</b>                    |
| St Blazey, Fowey and Lostwithiel CNA <b>residual</b>      | <del>800</del> <b>260</b>     |
| <b>Roche</b>  | <b>210</b>                    |
| <b>St Dennis</b>  | <b>185</b>                    |
| <b>Indian Queens with St Columb Road &amp; Fraddon</b>    | <b>315</b>                    |
| <b>St Stephen</b>   | <b>175</b>                    |
| China Clay CNA <b>residual</b>                            | <del>4,500</del> <b>920</b>   |
| Wadebridge  | <del>4,000</del> <b>1,100</b> |
| <i>Wadebridge and Padstow CNA residual</i>                | <del>4,000</del> <b>1,100</b> |
| Bodmin  | <del>3,000</del>              |
| <i>Bodmin CNA residual</i>                                | <del>200</del>                |
| <b>Camelford</b>  | <b>375</b>                    |
| <i>Camelford CNA residual</i>                             | <del>4,200</del> <b>685</b>   |
| Bude <b>with</b> Stratton, <b>Flexbury and</b> Poughill   | <del>900</del> <b>1,200</b>   |
| <i>Bude CNA residual</i>                                  | <del>600</del>                |
| Launceston  | <del>4,500</del> <b>1,800</b> |
| <i>Launceston CNA residual</i>                            | <del>400</del> <b>500</b>     |

|                                       |                      |
|---------------------------------------|----------------------|
| Liskeard                              | 4,250 <b>1,400</b>   |
| <i>Liskeard and Looe CNA residual</i> | 4,400 <b>1,500</b>   |
| <b>Callington</b>                     | <b>480</b>           |
| <i>Caradon CNA residual</i>           | 4,000 <b>520</b>     |
| Saltash                               | 4,000 <b>1,200</b>   |
| Torpoint                              | 350                  |
| <i>Cornwall Gateway CNA residual</i>  | 350                  |
| <b>TOTAL:</b>                         | 47,500 <b>52,500</b> |

2.3.4 Policy change No. 2a therefore provides for an increase in the number of new net dwellings from 47,500 new dwellings to 52,500 new dwellings, to the end of the Plan period (2030). This is an increase of 5,000 planned dwellings throughout Cornwall (i.e. 11%), compared to the levels assessed in the previous HRA. This change also provides permanent pitches for Gypsy, Traveller and Showpeople and provision for student accommodation in Falmouth with Penryn. In addition, this change provides for an increase in employment space from 422,400 sq/m, to 704,000 sq/m, an increase of 281,600 sq/m (67%) to the end of the Plan period. Table 1 (Table 29 above) of this policy details the modified locations for residential development within Cornwall. Potential impact pathways present are:

- Recreational pressure (discussed in Chapter 3)
- Air quality (discussed in Chapter 4)
- Water resources and water quality (discussed in Chapter 5)
- Coastal squeeze (discussed in Chapter 6)

**Table 30: Policy change No. 3**

| Policy change No., Policy Number, and Location of Change                                   | Proposed Change   |
|--|---|
| Policy change No. 3<br><br><b>Policy 3 – Role and function of places</b><br><br>Throughout | <p>The scale and mix of uses of development and investment in services and facilities should be proportionate to the role and function of places. New development <b>up to 2030</b> <del>2040-2030</del> will be accommodated in accordance with the following hierarchy:</p> <p>1. Delivery of the overall housing provision as set out in Policy 2 alongside larger <b>strategic</b> scale housing, community, cultural, leisure, retail, utility and employment provision will be managed through a Site Allocations DPD or Neighbourhood Plans for following locations:</p> <ul style="list-style-type: none"> <li>• Bodmin;</li> <li>• Bude with Stratton, <b>Flexbury</b> and Poughill;</li> <li>• Camborne with Pool, Illogan and Redruth;</li> <li>• Falmouth with Penryn;</li> <li>• Hayle;</li> <li>• Helston;</li> <li>• Launceston;</li> <li>• Liskeard;</li> <li>• Newquay;</li> <li>• Penzance with Newlyn, <b>Heamoor, Gulval and Longrock</b>;</li> </ul> |

- Saltash;
- St Austell;
- St Ives with Carbis Bay;
- Truro with Threemilestone and **Shortlanesend**; and
- Wadebridge.

**Development within these named towns will provide an appropriate level of affordable housing in accordance with the requirement of Policy 8.**

2. To promote vibrant local communities and support local services, an appropriate level of growth and investment will be encouraged settlements to reinforce their role as providers of employment; community; leisure; and retail facilities **and will be managed through a Site Allocations DPD or Neighbourhood Plans:**

**Development within these named towns will provide an appropriate level of affordable housing in accordance with the requirement of Policy 8 for infill sites or policy 9 for exception sites.**

- **Callington;**
- **Camelford;**
- **Indian Queens with St Columb Road & Fraddon;**
- **Lostwithiel;**
- **Perranporth;**
- **Roche;**
- **St Agnes;**
- **St Blazey with Par;**
- **St Dennis; and**
- **St Stephen.**

3. Outside of the main towns identified in this Policy, housing growth will be **delivered for the remainder of the housing requirement for the Community Network Area** through identification of sites where required through **in** Neighbourhood Plans **or** affordable housing-led schemes **rural exceptions sites** (i.e. exception schemes where market housing is required to provide cross subsidy) under Policy 9 and infill development defined below. **The starting point for this distribution of growth will be pro rata to the number of households in the parish (based on the census, 2011), excluding commitments and completions.**

**Within the AONB or its setting, schemes will be supported where they are in accordance with the other policies of this plan and can demonstrate that they conserve and enhance the landscape character and natural beauty of the AONB. Major development proposals will not be supported in the AONB.**

Infill for the purposes of residential development should be proportionate to the scale of the settlement and within its boundaries, respect the settlement and landscape character of the locality and not physically extend the settlement. It must clearly relate to part of an established settlement and not isolated dwellings. Particular preference will be given to sites on previously developed land.

2.3.5 Policy change No. 3, details the location for provision of new 'strategic scale housing, community, cultural, leisure, retail, utility and employment provision'. Potential impact pathways present include:

- Recreational pressure (discussed in Chapter 3)
- Air quality (discussed in Chapter 4)
- Water resources (discussed in Chapter 5)
- Coastal squeeze (discussed in Chapter 6)

Table 31: Policy change No. 12

| Policy change No., Policy Number, and Location of Change  | Proposed Change   |
|---|---|
| <p>Policy change No. 12</p> <p><b>Policy 12 Gypsies, Travellers and Travelling Showpeople</b></p> <p>Whole Policy</p> | <p><b><i>Proposals for new residential and transit sites and extensions to existing sites will be approved where they:</i></b></p> <p><b><i>i. Are of appropriate size to meet the identified need and proportionate in scale to and avoid dominating any nearby settled community. Where extensions to sites are proposed, these should also be of a scale compatible with the existing site;</i></b></p> <p><b><i>ii. Take account of the particular and differing needs of different groups of Gypsies and Travellers;</i></b></p> <p><b><i>iii. Are located so as to ensure reasonable access (defined as 3 miles for transit sites and less for permanent sites) by a range of transport modes, including walking and cycling to services including GP and other health care provision, education facilities, shops and public transport;</i></b></p> <p><b><i>iv. Provide safe road access and sufficient space within the site for parking and turning of vehicles as well as the storage of equipment, and for transit sites, are located reasonably close to, or easily accessible from the primary or county road network;</i></b></p> <p><b><i>v. avoid areas (including those with noise or air quality issues or are in areas at high risk of flooding) that would have a detrimental impact on the health and well-being of any travellers that may locate there;</i></b></p> <p><b><i>vi. Include sufficient residential amenity and play areas to meet the needs of residents of the site and promote healthy lifestyles; and</i></b></p> <p><b><i>vii. Provide opportunities for travellers to live and work from the same location where this can be sensitively designed to mitigate potential impacts on the site surroundings or other residential uses near to the site;</i></b></p> <p><b><i>Permission will not be granted for the redevelopment for alternatives uses of a Gypsy and Traveller site unless it can be demonstrated that an alternative site of similar or better quality and location has been provided within the plan area to meet the needs of Gypsies and Travellers.</i></b></p> |

2.3.6 Policy change No.12, details the requirement for 'new residential and transit sites and extensions to existing sites'. This policy does not detail any location, or quantum of development. Potential impact pathways present include:

- Recreational pressure (discussed in Chapter 3)
- Air quality (discussed in Chapter 4)
- Water resources (discussed in Chapter 5)
- Coastal squeeze (discussed in Chapter 6)

### 3 Recreational Pressure

3.1.1 Correspondence with Natural England<sup>6</sup> identified the internationally designated sites that they consider to be vulnerable to increases in recreational pressure from additional housing development and tourism in Cornwall. These are:

- Marazion Marsh SPA;
- Fal and Helford SAC;
- Falmouth Bay to St Austell Bay pSPA;
- Godrevy Head to St Agnes SAC;
- Penhale Dunes SAC;
- Carrine Common SAC;
- Plymouth Sound and Estuaries SAC; and,
- Tamar Estuaries Complex SPA.

3.1.2 Locations of the internationally designated sites are illustrated in Appendix A, Figure 1. Table 32 is the screening exercise of the new settlements identified for residential development (within Policy change No. 2a and Policy change No. 3) that could result in likely significant effects. The distance thresholds used to screen the internationally designated sites are derived from visitor survey data discussed later in this report and from knowledge of visitor distance thresholds for similar internationally designated sites.

**Table 32: Additional Settlements identified within Change 2a.**

| Settlement   | Distance to nearest internationally designated site(s)            | Likely significant effects resulting from recreational pressure |
|--|---|---|
| <b>Gulval and Longrock</b>                             | Longrock: 150m; Gulval: 1.8km from Marazion Marsh SPA             | Recreational Pressure   |
| <b>Heamoor</b>   | 3.3km from Marazion Marsh SPA                                     | No Likely significant effect                                    |
| <b>St Agnes</b>  | 1.3km from Godrevy Head to Agnes SAC                              | Recreational Pressure   |
|  | 4.7km from Penhale Dunes SAC                                      | Recreational Pressure   |
| <b>Perranporth</b>                                     | Within 155m from Penhale Dunes SAC                                | Recreational Pressure   |
|  | 6km from Godrevy Head to Agnes SAC                                | No Likely significant effect                                    |
|  | 6km from Newlyn Downs SAC   | No Likely significant effect                                    |
| <b>St Blazey/Par</b>                                   | 4.3km from St Austell Clay Pits SAC                               | No Likely significant effect                                    |
|  | 4.4km from Polruan to Polperro SAC                                | No Likely significant effect                                    |
|  | 5km from Breney Common and Goss & Tregoss Moors SAC               | No Likely significant effect                                    |
| <b>Lostwithiel</b>                                     | 4.1km from Breney Common and Goss & Tregoss Moors SAC             | No Likely significant effect                                    |
| <b>Roche</b>   | 580m from Breney Common and Goss & Tregoss Moors SAC              | No Likely significant effect                                    |
|  | 1.2km from the River Camel SAC                                    | No Likely significant effect                                    |
|  | 1.3km from St Austell Clay Pits SAC                               | No Likely significant effect                                    |
| <b>St Dennis</b>                                       | 750m from Breney Common and Goss & Tregoss Moors SAC              | No Likely significant effect                                    |
|  | 2.6km from St Austell Clay Pits SAC                               | No Likely significant effect                                    |
| <b>Indian Queens with St Columb Road &amp; Fraddon</b> | Indian Queens 1km from Breney Common and Goss & Tregoss Moors SAC | No Likely significant effect                                    |
|  | 7.8km from Newlyn Downs SAC                                       | No Likely significant effect                                    |
| <b>St Stephen</b>                                      | 1.1km from St Austell Clay Pits SAC                               | No Likely significant effect                                    |

<sup>6</sup> Ibid  
Email correspondence dated 19<sup>th</sup> January 2016

|                      |   |                              |
|----------------------|---|------------------------------|
|                      | 3.8km from Breney Common and Goss & Tregoss Moors SAC                     | No Likely significant effect |
| <b>Camelford</b>     | Adjacent to the Camel River SAC   | No Likely significant effect |
|                      | 3.3km from Crowdy Marsh SAC   | No Likely significant effect |
|                      | 6km from Tin tagel-Marshland-Clovelly Coast SAC                           | No Likely significant effect |
| <b>Flexbury</b>      | Adjacent to Tin tagel-Marshland-Clovelly Coast SAC                        | No Likely significant effect |
|                      | 7.4km from Culm grassland SCA   | No Likely significant effect |
| <b>Callington</b>    | 4.4km from the River Camel SAC  | No Likely significant effect |
|                      | 5.4km from Plymouth Sound & Estuaries SAC and Tamar estuaries Complex SPA | Recreational Pressure        |
|                      | 8.3km from Phoenix United Mine & Crow's Nest SAC                          | No Likely significant effect |
| <b>Shortlanesend</b> | 3.3km from Fal & Helford SAC  | Recreational Pressure        |
|                      | 4km from Carrine Common SAC   | Recreational Pressure        |
|                      | 8km from Penhale Dune SAC   | Recreational Pressure        |
|                      | 6km from Newlyn Downs SAC   | No Likely significant effect |
|                      | 9.7km from Godrevy Head to Agnes SAC                                      | No Likely significant effect |

3.1.3 This document therefore focusses on the additional housing at these settlements and European sites:

- Gulval and Longrock on Marazion Marsh SPA;
- St Agnes on Godrevy Head to St Agnes SAC and Penhale Dunes SAC;
- Perranporth on Penhale Dunes SAC and Godrevy Head to St Agnes SAC;
- Callington on Plymouth Sound & Estuaries SAC and Tamar estuaries Complex SPA; and
- Shortlanesend on Fal and Helford SAC, Carrine Common SAC, and Penhale Dunes SAC.

## 3.2 Marazion Marsh SPA

3.2.1 Marazion Marsh is designated for passage/wintering birds rather than species present in the summer, it is considered that recreational visitors from the local area (particularly dog walkers) will visit the site frequently during winter as well as the summer. However, the SPA is an RSPB reserve and public access (from across the country) is therefore both actively encouraged and well-managed. Paths and hides are provided specifically to avoid the most sensitive areas of the site for birds; moreover, the marshy nature of the habitat will naturally deter off-track access. There are also controls on dog presence within the site; while some visitors occasionally break these codes there is a prosecution system which is likely to serve as a deterrent for the majority. As such, it is considered that good management mechanisms are already in place.

3.2.2 Since the October 2014 HRA, the RSPB have expressed some concerns about disturbance to avian features arising from kite surfing and dog walking. The disturbance impact of kite surfing in Mounts Bay between the Mount and the beach has been highlighted as an action in the SPA Site Improvement Plan (SIP)<sup>7</sup>. In addition, correspondence with Natural England<sup>8</sup> has raised concern '*that dog walkers parking on the seafront and then entering through part of the reserve that is open to the road with very little screening are disturbing birds on the reserve. Housing growth in the area has the potential to increase this problem*'.

3.2.3 At the recommendation of Natural England, the Council is undertaking visitor surveys of internationally designated sites, including Marazion Marsh SPA to help determine the catchment area for recreational activities. These have not yet been completed. The initial findings of the visitor surveys published in November 2015<sup>9</sup> detailed that:

- 53% of visitors came from within 1km of the site;
- 35% of visitors came from between 1.1 to 2km from the sites; and,
- 12% of visitors came from between 2.1 and 3km from the site.

<sup>7</sup> Natural England. (December 2014). Marazion Marsh Site Improvement Plan. [Accessed 27/11/15]

<sup>8</sup> Letter from Natural England to Cornwall council dated 24/07/15

<sup>9</sup> Cornwall Council (2015). Marazion Marsh SPA – Initial report November 2015. Unpublished

- 3.2.4 A precautionary zone of 3km has therefore been agreed with Natural England from within which a substantial increase in housing provision could result in an increase in recreational pressure which, if left unmitigated could result in likely significant effects upon the designated site.
- 3.2.5 As detailed in Table 32, the additional settlements of Gulvul and Longrock added to Policy 2a within Policy change No. 2a are located within 3km of the SPA and as such have potential to result in a likely significant effects resulting from increases in recreational pressure upon Marazion Marsh SPA in combination with other projects and plans. These have been included within the Penzance with Newlyn allocation. Out of the four settlements, Longrock is located the closest: 150m from the SPA.
- 3.2.6 Within the previous iteration of the Local Plan, 2,150 new dwellings were provided for within Penzance and Newlyn (located approximately 2.5km from the SPA). Policy change No.2a, has added the settlements of Gulval, and Longrock to Penzance with Newlyn, so between the four settlements and Heamoor, they will continue to deliver 2,150 new dwellings. There has been no change in the number of houses provided within this area. An increase of 2,150 new dwellings would result in a worst-case local population increase of approximately 5,160 people<sup>10</sup> throughout the Plan period. However, most of these dwellings will be at Penzance and Newlyn, within the distance band in which only 12% of visitors to the site originate. Relatively few dwellings will be located within Gulval and Longrock, which are within the zone that contributes 88% of visitors to the site.
- 3.2.7 Within the pre-amble of Policy change No. 23a it states that a '*supplementary planning document will be produced, based on the findings of the study, setting out the required mitigation for each European site. Following collection of baseline information draft guidance will be published in Autumn 2016 with a view to adoption of the SPD in Spring 2017. Cornwall Council will work with other Competent Authorities and partners in using the information gathered to help inform the future management of the sites*'<sup>11</sup>. Policy change No. 23a demonstrates the Council's commitment to address these issues through the requirement for site specific access and visitor management, monitoring of the impact to further inform management as required, and the requirement for the implementation of mitigation measures. '*To achieve these mitigation measures, all residential development within the zones shown in figure xx and as informed by the emerging evidence base, that result in additional dwellings will be required to provide for appropriate management, mitigation and/or financial contributions towards off-site mitigation. This will need to be agreed and secured prior to approval of the development.*' It is considered that detail within this policy provides a commitment from the Council to address issues relating to internationally designated sites stemming from the Local Plan documents and provides adequate protection for this internationally designated site and others.
- 3.2.8 In the previous HRA it was concluded (based at that time on a precautionary visitor catchment of 5km, which can now be refined to 3km) that since the RSPB actively encourages public access, it is considered that any increase in visitors associated with the delivery of new housing within the core catchment could be accommodated within the existing management structures for the SPA, which would therefore avoid an adverse effect on the integrity of the SPA. The modest population growth associated with new housing may require a modest uplift in resources to aid continued delivery of the management plan for the site. The RSPB has proven on other reserves that they are well able to combine large scale public access with wildlife interest.
- 3.2.9 Whilst Gulvul and Longrock are located closer to Marazion Marsh than Penzance, the addition of these settlements to the Local Plan does not alter the conclusions from the October 2014 HRA of the Cornwall Local Plan since the overall number of proposed dwellings within the catchment has not changed<sup>12</sup>.

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<sup>10</sup> Assumed average household contains 2.4 people and that all households are occupied by people who do not currently live in these settlements. In reality this is probably an over-estimate of population growth.

<sup>11</sup> Change No. 100

<sup>12</sup> Ibid

### 3.3 Fal & Helford SAC

- 3.3.1 Fal & Helford SAC is located adjacent to the Falmouth and Penryn CNA. As a coastal SAC it is likely to have a larger catchment than most inland SACs. The entire CNA lies within 10km of the SAC (with the two main settlements located within 5km) and may well therefore lie within the core recreational catchment of the site. Natural England requested that a visitor survey be undertaken to determine an accurate core catchment for recreational pressure to this site. At the time of writing this report, an interim visitor survey report was available. This indicated that the core catchment for recreational pressure for this SAC was 10km (as had been assumed as a precaution within the October 2014 HRA). This zone has since been agreed with Natural England.
- 3.3.2 Policy change No.2a provides for an additional 300 dwellings (i.e. a total of 3,400 dwellings) within the Falmouth and Penryn CNA, to the end of the Plan period; a 10% increase over that assessed in the previous HRA. The Truro and Roseland CNA also lies within 10km of the SAC; particularly Truro itself, which is the focus of new housing within the CNA and will receive approximately 4,200 dwellings (an increase in 1,200 new dwellings above that identified within the previous iteration of the Local Plan). Most of Helston & the Lizard CNA (notably Helston itself) also lies within 10km of the SAC. The CNA is allocated 2,300 dwellings between 2010 and 2030, an increase of 300 dwellings from the previous iteration of the Local Plan. These 300 dwellings are all located within Helston, and constitute an increase of 1/3 at this location or of 15% in overall numbers within the CNA. The further significant changes therefore propose a further 1,800 dwellings within the core catchment of the SAC, or an increase of 22% over that assessed in the previous HRA. Any new residential development within 10km of the SAC has the potential to result in likely significant effects upon the SAC as a result of increased recreational pressure from new housing.
- 3.3.3 Recreational activities noted as being undertaken within the SAC include: canoeing, sailing, diving, rowing, water skiing and wind surfing. Most of the habitats and species for which the SAC is designated are not particularly vulnerable to recreational pressure<sup>13</sup>. The main designated habitat of vulnerability is saltmarsh, which is only present over restricted areas of the SAC, principally the upper reaches of Fal-Ruan Creek, Restronguet Creek and Calenick Creek. As a result, recreational pressure is less of a concern in the SAC than commercial activities and the management scheme currently in place therefore prioritises commercial activities and restricts itself to '*monitor the level and pattern of recreational activities to inform future management decisions as necessary*' with regard to recreation. It can be concluded that the SAC is not currently subject to unmanageable levels of recreational activity.
- 3.3.4 It is considered that the recommendation of the previous HRA (which is now in process with the undertaking of the visitor survey) remains appropriate, namely that Cornwall Council should commit to working with its other partners in delivering the Fal & Helford SAC Management Scheme. There must also be a commitment to deliver any management changes required (including ensuring sufficient budget/resources). This would be in line with delivery of the SAC Management Scheme objective to 'monitor the level and pattern of recreational activities to inform future management decisions as necessary' with regard to recreation and it is clearly logical for the Council to continue to provide its support through this existing forum.
- 3.3.5 As noted in paragraph 3.2.7, Policy change 23a provides for full protection of internationally designated sites and includes the ability to incorporate emerging evidence as it become available (including the outcome of monitoring), to best inform mitigation measures, thus providing a flexible approach to the type and level of mitigation required to ensure no likely significant effects upon this SAC result.

### 3.4 Falmouth Bay to St Austell Bay pSPA

- 3.4.1 Within the October 2014 HRA<sup>14</sup>, this site was screened out of the assessment. This Proposed SPA would be designated for its population of wintering diving birds (black-throated diver, great northern diver and Slavonian grebe). The Impact Assessment accompanying the current consultation on the SPA designation proposal identified the following categories of activities that occur within or adjacent to the area covered by the SPA: recreation; commercial fishing, shipping; renewables; oil and gas; marine cables; and defence. However, the January 2014 consultation document identified that the only activity within these categories which would potentially requiring management, and which therefore may conflict with the SPA, was the fixed/drift net fishery. This activity is not associated with Local Plan development. As such, it was considered that this site could be scoped out of the HRA of

<sup>13</sup> Reefs would be vulnerable to abrasion from boats, but recreational boat users will seek to avoid reefs as much as possible. Shore dock would be vulnerable but is not present within an easily accessible location.

<sup>14</sup> Ibid

the Local Plan. However, since October 2014, correspondence with Natural England<sup>15</sup> detailed that *'The Vulnerability Assessment developed as part of the consultation documents did indicate that recreational activities posed a low risk to the pSPA features, which may be seen in-part as a result of recreational seasonality and the seasonality of the interest features. However changing economic pressures (e.g. housing, tourism and the growth of the recreation sector) may well result in increased recreation activity and associated infrastructure (e.g. mooring/berths, marinas, access roads etc.) within the pSPA. Gathering evidence on the current (and understanding potential future patterns of recreational use) will be important in considering the need and scale of any necessary mitigation measures.'* Following this, Natural England also requested that evidence be gathered to help understand the current patterns of use of the site, although they have not stated that at this point any actual mitigation would be required. Much of this SPA overlaps with Fal and Helford SAC. At the time of writing this report, no results from a visitor survey covering this area were available.

- 3.4.2 It can be argued that it is not within the remit of this document to undertake HRA of specific projects such as mooring/berths, marinas and access roads<sup>16</sup>. Guidance from the former Department of Communities and Local Government states that the HRA should be *'proportionate to the geographical scope of the [plan policy]'* and that *'an AA need not be done in any more detail, or using more resources, than is useful for its purpose'* (CLG, 2006, p.6). More recently, the Court of Appeal<sup>17</sup> ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be *'achieved in practice'* to satisfied that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Core Strategy)<sup>18</sup>. In this case the High Court ruled that for *'a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations'*. The provision of these types of developments (mooring/berths, marinas, access roads) are not identified within the Plan, and are not automatically associated within increases in housing provision. In addition, these types of development would be considered within a separate consenting process to the Local Plan, in line with standard development management processes. However, an increase in population resulting from an increase in housing provision could increase the use of existing developments of this type (mooring/berths, marinas, access roads).
- 3.4.3 As with many coastal sites, in the absence of any visitor survey data it is assumed that the core catchment of this pSPA is likely to be c.10km, pending collection of more specific data. The pSPA is located adjacent to the Falmouth and Penryn CNA which is identified to provide 3,400 new dwellings and also within Truro and Roseland CNA which is identified to provide 5, 400 new dwellings. The 10km catchment incorporates parts of the St Blazey, Fowey and Lostwithiel CNA which will provide 905 new dwellings within the Plan Period. This equates to a total increase in dwellings of 9,700 (or approximately 23,280 people<sup>19</sup>) within the core catchment of the SAC, or an increase in dwellings of 24% over that provided within the previous iteration of the Local Plan.
- 3.4.4 The SPA is proposed to be designated for the presence of wintering black-throated diver, great northern diver and Slavonian grebe. The pSPA area is the most important site in the UK for wintering black-throated divers and the most important site in England for great northern divers with Slavonian grebe present in numbers triggering SPA qualification. It can be considered that the pSPA features are not very vulnerable to increases in recreational pressure (as opposed to development of new recreational infrastructure) as the features are only present in the winter months when levels of recreational activity will be considerably lower than in the summer months. In addition, most conflicts between roosting/foraging birds and recreational activity in coastal areas arises when dog walking and similar activities take place on the intertidal mudflats and sandflats when birds are roosting and feeding. None of the three species of bird for which the pSPA is designated roost or feed on intertidal mudflat/sandflat at low tide and will therefore be geographically separated from the major sources of disturbance. Provided the development of new recreational infrastructure is appropriately managed, there is no expectation of a significant disturbance impact from new residents. However, at this time, insufficient data is available to determine recreational use of the pSPA, both along the shoreline and further out to sea. Following consultation with Natural England the following has been agreed to ensure no likely significant effects occur within the SPA as a result of the Cornwall Plan:

<sup>15</sup> Letter dated 24<sup>th</sup> July 2015

<sup>16</sup> As identified within correspondence with Natural England. Letter Dated: 24<sup>th</sup> July 2015.

<sup>17</sup> No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17<sup>th</sup> February 2015

<sup>18</sup> High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

<sup>19</sup> Assumed 2.4 people occupy each dwelling and that all households are occupied by people who do not currently live in these settlements. In reality this is probably an over-estimate of population growth.

*Building on the study<sup>20</sup> recommendations for the Fal and Helford SAC, and combining data gathering where the designation areas overlap and extending out into the wider area of the pSPA.*

*The first stage will be a desk study to identify user groups and establish potential access points. Work is underway with the Harbourmaster's office to identify moorings and public slipways, for those areas not already covered by the Fal and Helford recreational boating study. Surveys will be carried out at main access points. The initial workshop for the Fal and Helford Stakeholder group will also be used to gather information for this area and contacts for the wider area.*

*As the information known currently is that there is potential for impact, it is proposed that no zone of influence is included at this stage, but a commitment to monitoring and establishing a baseline of information.'*<sup>21</sup>

- 3.4.5 For the reasons details within paragraph 3.2.7, the Local Plan is considered to contain sufficient commitment and flexibility to provide appropriate mitigation to ensure no likely significant effects result from increases in recreational pressure resulting from the Plan.

### **3.5 Godrevy Head to St Agnes SAC**

- 3.5.1 This SAC lies within the St Agnes and Perranporth CNA. Both key settlements within the CNA (St Agnes and Perranporth<sup>22</sup>) lie well within the large core catchments that surveys indicate are more typical of coastal sites (e.g. c.10km) and St Agnes lies 1.3km from the SAC. Within the previous iteration of the HRA it was estimated that the core catchment area for this SAC was likely to be approximately 10km based on known results for other coastal European sites. Natural England requested that a visitor survey be undertaken to determine an accurate core catchment for this site.

- 3.5.2 The interim survey report has identified that *'The survey results suggest that the majority of regular users are local residents living within 2km of the site [such that the assumption made for the previous HRA appears to have been very precautionary]. A 2km zone of influence could be reasonably applied. However there is no evidence that these users are impacting on site integrity. The activities identified by the National Trust Ranger and by the Cornwall Local Plan HRA are not being carried out by these walkers, who tend to stick to the paths, since the terrain outside the paths is tricky; this was reflected in the questionnaire responses.*

*Monitoring and surveys of the site will continue throughout Winter, Spring and Summer 2016 to verify these initial conclusions and to develop guidance should evidence emerge that regular recreational use is causing significant effects on the features of the SAC.'*<sup>23</sup>

- 3.5.3 In the previous iteration of the Local Plan, housing was provided within St Agnes and Perranporth CNA. This latest iteration provides for a specific number of dwellings within each of these settlements and the rest of the CNA (see Table 29). It provides for a very small decrease in the number of dwellings (5 dwellings) within this area. Outside the St Agnes and Perranporth CNA, the nearest settlement to this SAC that will receive significant housing is the Camborne-Pool-Redruth (CPIR) conurbation within the eponymous CAN, which lies approximately 6-7km from the SAC. This can be screened out as it is beyond the current 2km zone of influence for recreational pressure. Given the conclusion of the visitor survey up to this point, the small catchment of the SAC and the effectively inconsequential change in proposed housing numbers within this catchment as a result of the further significant changes, it is considered that the previous conclusion of the HRA was very precautionary and that an adverse effect on integrity is unlikely to arise.
- 3.5.4 Moreover, as noted in paragraph 3.2.7, Policy change 23a provides for full protection of internationally designated sites and includes the ability to incorporate emerging evidence as it become available (including the outcome of monitoring), to best inform mitigation measures, thus providing a flexible approach to the type and level of mitigation required.

### **3.6 Penhale Dunes SAC**

- 3.6.1 This site lies within the St Agnes and Perranporth CNA. Both key settlements within the CNA (St Agnes and Perranporth) lie within 10km of the SAC. The previous iteration of the Local Plan HRA, considered that this SAC was likely to have a core catchment of approximately 10km. Natural England requested that a visitor survey be completed to determine a more precise core catchment area for recreational visitors to this site. This work is currently underway. Preliminary findings suggest

<sup>20</sup> Visitors survey undertaken in 2015

<sup>21</sup> Cornwall Council (2015). Falmouth Bay to St Austell Bay pSPA – initial report November 2015. Unpublished

<sup>22</sup> Located 5.8km from the SAC

<sup>23</sup> Cornwall Council (2015). Godrevy Head to St Agnes SAC – initial report November 2015. Unpublished

that 34% of visitors came from within 5km of the site, 25% from between just over 5km and 13% came from between 6-10km, suggesting a core catchment of between 6 and 10km. Following consultation with Natural England on the initial findings of the visitor surveys a 'zone of influence of 8km could reasonably be identified, as an area where residents who owned dogs would be likely to use this site as a regular dog exercising area'... 'This should continue to be tested by the surveys which will be conducted in winter, spring and summer 2016. The relative impact of tourist activity must be factored in, to ensure that impact is reasonably related to local users. The 2015 summer surveys, although not extensive enough to be relied on, showed close to a 50/50 split between local and tourist users, so year round, the proportion of impact by local users may be smaller than indicated in these surveys – and those surveyed in autumn reported that they visited the site less often in the summer. This will be tested in the summer 2016 surveys'<sup>24</sup>. As such, a zone of influence of 8km is used for the purpose of this assessment.

- 3.6.2 As noted in Table 29, the latest iteration of the Local Plan actually involves a small decrease in dwellings (5 dwellings) within the St Agnes and Perranporth CNA. However, this SAC also lies adjacent to Newquay and St Columb CNA. The further significant changes provide for an increase in the provision of dwellings within this CNA from 3,550 to 3,800(250 dwellings). This equates to a 5% increase in the total number of dwellings planned for delivery within the core catchment of the SAC, compared to the previous version of the Local Plan and its HRA. It is therefore considered that the conclusion of the previous HRA remains valid.
- 3.6.3 As noted in paragraph 3.2.7, Policy change 23a seeks to implement the previous recommendations of the HRA and Natural England's comments by providing for full protection of internationally designated sites and includes the ability to incorporate emerging evidence as it become available (including the provision of and results from monitoring) to best inform mitigation measures, thus providing a flexible approach to the type and level of mitigation required. As such, adverse effects on the SAC can be avoided through implementation of this policy.

## 3.7 Carrine Common SAC

- 3.7.1 Truro–Threemilestone-Shortlanesend is situated within 1km of this SAC and is likely to receive 1,121 dwellings under Policy PP6 of the Local Plan (discounted for the 3,079 that have been delivered since 2010 or already have planning permission). There are approximately 11,789 existing or committed households in Truro<sup>25</sup>, so a further 1,121 dwellings would involve an increase of approximately 10% (based on the very conservative assumption that all new dwellings will be additional to existing housing stock rather than replacement dwellings). Although this SAC is common land, opinion from the Council is that this area is not much used for recreation and the 2015 visitor survey did not encounter a single visitor to the site notwithstanding its close proximity to Truro. These sentiments have been mirrored by Natural England who agreed that the sites should continue to be surveyed throughout the season in 2016 and monitoring of the site will be used to inform any mitigation that may be required, but that there is no basis to currently conclude that any adverse effect is expected.
- 3.7.2 As noted in paragraph 3.2.7, Policy change 23a provides for full protection of internationally designated sites and includes the ability to incorporate emerging evidence as it become available (including the provision of and results from monitoring) to best inform mitigation measures, thus providing a flexible approach to the type and level of mitigation required. As such, adverse effects on the SAC can be avoided through implementation of this policy.

## 3.8 Plymouth Sound and Estuaries SAC/ Tamar Estuaries Complex SPA

- 3.8.1 This SAC and SPA lies adjacent to the Caradon CNA of which the main settlement is Callington and within the Cornwall Gateway CNA of which the main settlement is Saltash. Almost all of both CNAs lie within 10km of this site and given the large catchment that other visitor surveys have identified can be associated with coastal sites, development across both CNA's could contribute to increased visitor activity. Policy change 2a (see Table 29) provides for no change in housing provision within Caradon (e.g. remaining at 1,000 dwellings). Natural England recommended undertaking a visitor survey of this site to help determine a more accurate zone of influence from within which new residential development could result in increases in recreational pressure upon the SAC and SPA sites. This has been jointly commissioned by Cornwall Council, Plymouth City Council, South Hams and West Devon Councils. At the time of writing, visitor surveys had commenced but not been completed. Based on the initial findings of the visitors survey, and following consultation with Natural England a 10km zone

<sup>24</sup> Cornwall Council (2015). Penhale Dubes – initial report November 2015. Unpublished.

<sup>25</sup> Oxford Consultants for Social Inclusion. Rural deprivation in Cornwall and the Isles of Scilly: Profile report for Truro. Final report. October 2009. Report for Cornwall County Council

of influence from within which an increase in residential development could result in an increase in recreational pressure resulting in likely significant effects upon the designated sites could arise will be retained until the results of the full study are known.

- 3.8.2 Table 29 identifies an increase of 200 dwellings within in Saltash (e.g. a total of 1,200 dwellings within Saltash), resulting in a 20% increase in dwellings within Saltash.
- 3.8.3 Since recreational activities within this site are dominated by activities arising from Plymouth, development in Cornwall would be unlikely to lead to a significant effect in isolation. However, it will make a small additional effect in combination with development in Plymouth and given the cross-boundary nature of management of this SAC and SPA, it would be logical for Cornwall to adopt the same measures that Plymouth has adopted in their Core Strategy and HRA.

### **3.9 Summary**

- 3.9.1 At present, the final results of visitor surveys on the above internationally designated sites are not yet available to fully inform mitigation to prevent likely significant effects resulting from increased recreational pressure resulting from increased housing provided within the Cornwall Local Plan further significant changes. Natural England have been consulted regarding the initial findings of the visitor surveys to date, resulting in the outline of definitive zones of influence from which an increase in residential development could result in increased recreational pressures, resulting in likely significant effects upon internationally designated sites. It is also noted that no zones of influence have been identified for Godrevy Head to St Agnes, Falmouth Bay to St Austell Bay pSPA or Carrine Common at the moment, but monitoring of these sites is required. This approach has been agreed with Natural England.
- 3.9.2 At a higher level, the with the inclusion of Policy change No. 23a, the Local Plan does ultimately provide a commitment and adequate protection to ensure no likely significant effects result from the Cornwall Local Plan.

## 4 Air Quality

### 4.1 Introduction

- 4.1.1 Within the previous iteration of this HRA, European sites within Cornwall were identified to be located within 200m of a major road, and thus potentially vulnerable to a reduction in air quality resulting from the Plan. That assessment concluded that, using the worst-case scenario of no improvement in background air quality over the Local Plan period, NO<sub>x</sub> concentrations due to Local Plan development would exceed the threshold of triviality (PC >1% of the critical level and PEC > 70% of the critical level) within 20m of the A30 at Breney Common and Goss & Tregoss Moors SAC and within 44m of the A30 at River Camel SAC. Nitrogen deposition due to the Local Plan would marginally exceed the threshold of triviality at River Camel SAC within 7m of the A389 and at Marazion Marsh SPA within 7m of the A394,
- 4.1.2 Since this scenario only occurred in the unlikely event of no improvement in background air quality it was concluded that no adverse effect from nitrogen deposition would arise in practice and that effects of elevated NO<sub>x</sub> along the A30 were sufficiently unlikely that they were best addressed through NO<sub>x</sub> and vegetation monitoring to accurately ground-truth the modelled results and inform any future management initiatives that may prove necessary over the Local Plan period to counter-balance any potential vegetative effect of elevated NO<sub>x</sub>. Natural England agreed with this conclusion.
- 4.1.3 However, since housing and employment levels across Cornwall have been raised for the Further Significant Changes, the assessment of air quality impacts needs to be repeated. That is the purpose of this chapter.

### 4.2 Appropriate Assessment

- 4.2.1 Department for Transport guidance as expressed in the Design Manual for Roads and Bridges (DMRB)<sup>26</sup> states that the first process in determining air quality impacts from schemes that may alter vehicle movements on the highway network is to determine whether the road in question is an 'affected road' which is defined as, among other criteria, if it will experience an increase in flows of more than 1,000 Average Annual Daily Traffic (AADT).
- 4.2.2 Traffic flows were therefore re-calculated in January 2016 for the links passing each European site. Since an assessment had already been undertaken, air quality calculations would only be necessary for links along which significant increase in flows had been shown from modelling. For other links the conclusion of previous air quality assessment would remain valid. In the table below, the change in flows as calculated for the original transport modelling is compared with that from the 2016 modelling. It can be seen that in a number of cases the change in flows has actually reduced despite the increase in housing numbers. This is due to the fact that several transport improvement schemes have become committed projects since the last round of transport modelling and have therefore been factored into the transport model.

| Link | Description  | Grid Ref | Total change both directions (2016 data) | Total change both directions (2014 data) | Comparison with previous flow change |
|------|--|----------|--|--|--------------------------------------|
| 1    | Breney Common and Goss & Tregoss Moors SAC lies within 200m of the A30 | SW976612 | + 5,379                                  | + 3,985                                  | Increase of 1,394                    |
| 2    | River Camel SAC crossed by the A39                                     | SX106835 | + 1,987                                  | + 2,840                                  | Reduction of 853                     |
| 3    | River Camel SAC crossed by the A389                                    | SX048678 | + 5,034                                  | + 5,965                                  | Reduction of 931                     |

<sup>26</sup> Design Manual for Roads and Bridges, Volume 11 Environmental Assessment, Section 3 Environmental Assessment Techniques, Part 1: Air Quality

| Link | Description  | Grid Ref | Total change both directions (2016 data) | Total change both directions (2014 data) | Comparison with previous flow change |
|------|--|----------|--|--|--------------------------------------|
| 4    | River Camel SAC crossed by the A30                   | SW986616 | + 5,379                                  | + 3,937                                  | Increase of 1,442                    |
| 5    | Plymouth Sound & Estuaries is within 200m of the A38 | SX354597 | + 1,120                                  | + 1,593                                  | Reduction of 473                     |
| 6    | Marazion Marsh SPA is within 200m of the A394        | SW517319 | + 6,065                                  | + 6,238                                  | Reduction of 173                     |
| 7    | Newlyn Downs SAC within 200m of the A30              | SW832533 | + 6,357                                  | + 3,043                                  | Increase of 3,314                    |
| 8    | St Austell Clay Pits SAC is within 200m of the A391  | SX022549 | + 4,746                                  | + 5,830                                  | Reduction of 1,084                   |

- 4.2.3 Air quality modelling was therefore updated for the A30 within 200m of Breney Common and Goss & Tregoss Moors SAC, the River Camel within 200m of the A30 and Newlyn Downs SAC within 200m of the A30.
- 4.2.4 The calculated vehicle flows in AADT were utilised alongside average vehicle speeds on that stretch of road and percentage Heavy Duty Vehicles to re-calculate the expected change in NOx concentrations and nitrogen deposition. The updated analysis is presented in Appendix 2. In the tables within Appendix 2 'Do Nothing' is the expected growth 2030 minus the Plan development, while 'Do Minimum' is the total expected growth including the Plan. Background concentrations have been held at 2010 levels in order to be comparable with the previous data. Defra periodically update their local air quality management tools, including the background pollutant concentration maps, to account for new monitoring data which they use to inform their projections. These were last updated in August 2014, subsequent to the last air quality calculations. The amendments to background data for 2010 resulted in NOx concentration maps for that year being reduced to reflect actual measured concentrations. This process usually takes several years. As such, the background NOx concentrations are lower in this 2016 air quality modelling than was the case in 2014 even though the same base year (2010) is used.
- 4.2.5 As with the previous air quality calculations a worst-case assumption has been used in re-running the calculations which assumes **no** improvement in background concentrations or emission rates between now and the future year. When interpreting the results of these calculations it must therefore be understood that assuming no improvement in background air quality or emissions technology over the period until 2030 is very likely to overestimate the total concentrations and contribution of Local Plan-related traffic that will actually occur. Whilst there is currently some uncertainty about the degree to which background pollutant concentrations are decreasing, one would expect to see some improvement by 2030 due to improving emissions technology and the evolution of this technology into the UK vehicle fleet, particularly the introduction of the Euro VI standard.
- 4.2.6 Environment Agency guidance<sup>27</sup>, to which Natural England also subscribe, advises that where the concentration within the emission footprint [i.e. the Process Contribution, the contribution of the scheme in question] in any part of the European site(s) is less than 1% of the relevant long-term benchmark (critical level or critical load), the emission is not likely to have a significant effect alone or in combination irrespective of the background levels. When the PC does exceed 1% of the critical level/load but the Predicted Environmental Concentration (the sum of the PC and the background concentrations) falls at or below 70% of the critical level/load then it is still possible to conclude without further analysis that no likely significant effect will result. Where the PC exceeds 1% of the critical level/load and the PEC exceeds 70% of the critical level/load this does not mean that an adverse effect will occur, but does mean further consideration of any potential effect is required.

<sup>27</sup> Environment Agency. 2007. Appendix ASC 1 Environment Agency Stage 1 and 2 Assessment of New PIR Permissions under the Habitats Regulations

- 4.2.7 The patterns of NO<sub>x</sub> concentrations and deposition are very similar to the previous round of air quality modelling. In summary, none of the modelled links resulted in a change in nitrogen deposition in which both the PC exceeded 1% of the Critical Level/Load and the PEC exceeded 70% of the Critical Level or Load.
- 4.2.8 As with the 2014 modelling, the Predicted Environmental Concentration (PEC) would exceed 70% of the critical level at:
- Breney Common and Goss & Tregoss Moors SAC at 20m from the roadside; and
  - River Camel SAC at 44m from the roadside (where adjacent to the A30).
- 4.2.9 However, in both cases total cumulative NO<sub>x</sub> concentrations are predicted to remain below the actual critical level of 30 µgm<sup>-3</sup>. Since the critical level (the empirically established concentration above which some adverse effects on vegetation may potentially occur) will not be exceeded there is no possibility of an adverse effect on the vegetation for which the European sites are designated.

## 1.1 Other plans and projects

- 4.2.10 Although local Energy from Waste sites within Cornwall which have recently been permitted could theoretically contribute to atmospheric deposition on some of these sites (such as Breney Common and Goss & Tregoss Moors SAC) air quality analysis has determined that no adverse effect on the integrity of any European site will result.

## 1.2 Conclusion

- 4.2.11 Largely due to refining of the 2010 background data by Defra to reflect actual modelled levels, there is no point at which nitrogen deposition will exceed the relevant screening thresholds, or at which total NO<sub>x</sub> concentrations will exceed the critical level due to Local Plan traffic. As such there will be no adverse effect on integrity
- 4.2.12 However, as a precaution it remains appropriate for the Council to undertake the air quality monitoring which was previously included in the Duty to Cooperate Statement in response to the 2014 HRA,

## 5 Water Resources and Water Quality

### 5.1 Introduction

5.1.1 This Chapter focuses on potential for water resource and quality impacts related primarily to any requirement for increased abstraction for the Public Water Supply to serve new housing that may lead to effects on European sites, and any potential for wastewater discharges to exceed the headroom of the current WwTW discharge consents for Cornwall as they affect European sites.

### 5.2 European site background

#### **Water resources**

5.2.1 The South West Water Resources Plan<sup>28</sup> identifies the two resources zones applicable to Cornwall. Resource zones are defined as '*the largest possible zone in which all resources, including external transfers, can be shared and hence the zone in which all customers experiences the same risk of supply failure from a resource shortfall*'. South West Water refers to its resource zones as 'Strategic Supply Areas' - the Colliford Strategic Supply Area serves most of Cornwall except the north east of the unitary authority. The Roadford Strategic Supply Area serves north western Cornwall and eastern Devon. These information sources identify that water supplies for most of Cornwall are from surface water sources either from the River Fowey and Collingford Reservoir, or from the River Wolf and River Tavy with associated Roadford Reservoir.

5.2.2 The Environment Agency, in their study into the water resource implications of recommended housing numbers set out in the RSS Panel Report<sup>29</sup>, identified that within the Roadford resource zone deficits are expected to arise throughout the planning period (the planning period of the abolished RSS was until 2026) under the 'dry year annual average scenario'.

5.2.3 In undertaking the HRA for the South West RSS, Land Use Consultants<sup>30</sup> identified European sites where water supply and levels are factors required to maintain the site's integrity, or where the site is already experiencing pressure from existing water abstraction. Land Use Consultants also liaised with the Environment Agency with respect to their RSS Panel Report (described above). Whilst the RSS has been abolished and predicted housing growth figures are therefore no longer applicable, key findings which identify those European Sites at risk from existing water abstractions and future pressures are identified below:

- Newlyn Downs SAC - water abstraction is identified as a current pressure. Groundwater aquifers may become depleted due to abstraction and contaminated by agricultural chemicals such as fertilisers, or by pollution leaking from landfill sites;
- River Camel SAC - drainage is identified as a current pressure. Drainage has a number of damaging effects on both the wet heath and the surrounding environment through, for example, lowering of the water table, increased erosion of peat, siltation of streams and rivers and increased risk of flooding. This site is therefore highly sensitive to water abstraction; and
- Dartmoor SAC - barriers to salmon migration, including effects of abstraction (migration routes include the Dart, Teign, Erme, Yealm, Tavy, Torridge and Taw).

#### **Water quality**

5.2.4 As noted in the previous iteration of this HRA, many of the most significant risks to water quality in Cornwall are as a result of agricultural activity. This falls outside the remit of the Cornwall Local Plan. Land Use Consultants also identified the risk of reduced water quality on European Sites arising from growth anticipated by the RSS in the South West related to increased pressures on existing STWs

<sup>28</sup> South West Water (2009) Water Resources Plan (2010-2035) (November 2009)

<http://www.southwestwater.co.uk/index.cfm?articleid=1556>

<sup>29</sup> Water Supply and Housing Growth in the South West of England. RSS Panel Report December 2007. Short Report, Environment Agency, March 2008.

<sup>30</sup> South West RSS Habitats Regulations Assessment Final Report, Land Use Consultants, February 2007 and South West Regional Spatial Strategy Proposed Changes HRA Executive Summary (July 2009) [http://www.southwest-ra.gov.uk/nqcontent.cfm?a\\_id=2655](http://www.southwest-ra.gov.uk/nqcontent.cfm?a_id=2655)

capacity and increased accidental pollution incidents associated with development. Land Use Consultants liaised with Natural England and the Environment Agency on the European Sites that require particular attention with regards to water quality and potential effects from development.

5.2.5 Within Cornwall and therefore pertinent to this HRA, and based on further consultation, we have identified that European sites within this assessment should include:

- Fal and Helford SAC - (with respect to its estuarine and requirement for freshwater inputs. Water pollution risks of this site were confirmed by the Environment Agency<sup>31</sup>. During the EA Stage 3 Review of Consents process, a number of issues were identified that could affect water quality at the SAC. Ammonia input was identified as a concern downstream of Ladock Valley, while suspended solids arising from Kernick Mica Dam could not be ruled out as having likely significant effects. Organic compounds, including tributyltin (TBT) were found to be discharged at potentially harmful levels from Falmouth Docks and Tank Farm separator facility. Additionally, nutrient levels arising from several STWs (Carnon Downs; Falmouth; Ladock Valley; Lanner St. Day; Mylor Bridge; Ponsanooth; St. Stephen (Coombe); and Truro (Newham)) could not be concluded to not be having detrimental effects on the SAC;
- Marazion Marsh SPA - diffuse pollution is identified as a potential threat to ecological integrity. However at the EA Stage 3 Review of Consents process, no likely significant effects of permitted water abstractions or discharges were determined, and therefore no permissions were carried forward into Stage 4. This site is therefore not discussed further in this Chapter;
- Plymouth Sound and Estuaries SAC - (with respect to sewage discharges, port development, dredging, oil pollution). Langston et al<sup>33</sup> note that *'parts of the system, notably the upper estuaries, are subject to nutrient enrichment. Although the majority of nutrient inputs in the system may be due to diffuse sources such as agricultural run-off, sewage discharges constitute additional loading and result in chronic contamination of the affected areas, and nutrient associated water quality problems. For example low levels of dissolved oxygen have occurred periodically in the upper Tamar and may be responsible for salmonid deaths.'* Langston et al (2003) also note that the introduction of hydrocarbons to the estuary environment through road run off & industrial sources (oil depot, dockyard discharges, sediments) as another 'principal area of concern' affecting quality of the SAC/SPA. The EA Review of Consents Stage 3 found the six discharge permissions could not be concluded to be having no likely significant effects on the SAC – these all related to levels of metals and non-metallic toxins. Three of the permissions related to STWs in Plymouth. At Stage 4 of the RoC, the preferred approach was to revoke consent conditions for dieldrin at Plymouth Central, revoke TBT consent conditions at Plymouth (Radford) and modify consents (remove headroom) at Plymouth Ernesettle in order to reflect present performance. The consent change approach was also recommended for Torpoint STW. Adjustment of consents was also required for one industrial and one quarry-related permission;
- Tamar Estuaries Complex SPA - (with respect to dredging and accidental oil pollution). In terms of EA-controlled discharge permissions, at RoC Stage 3, no permissions with potential impacts on the SPA were identified to be taken forward to Stage 4. This site is therefore not considered further in this Chapter; and
- River Camel SAC - (the SAC form identifies that otter and bullhead are dependent on water quality). During the EA Review of Consents Stage 3 process several STWs were cited as potentially contributing to adverse effects on the SAC through phosphorus discharges (Delabole STW; Camelford STW; Bodmin (Scarlett's Wells) STW; Nanstallon STW; St. Mabyn STW; St. Teath STW). Bodmin (Scarlett's Wells), Delabole, and Nanstallon were also identified based on issues relating to one or more of dissolved oxygen levels, water quality with respect to supporting salmon, and ammonia. At the Stage 4 of the RoC process, phosphorus stripping was required of Camelford, Bodmin (Scarlett's Wells) and Delabole STWs (by March 2008). Nanstallon STW was determined to meet requirements for supporting salmon in receiving water courses.

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<sup>31</sup> Draft RSS SW Panel report: The Environment Agency's observation on housing growth and waste water treatment, March, 2008

<sup>33</sup> Langston, W.J., Chesman, B.S., Burt, G.R., Hawkins, S.J., Readman, J. and Worsfold, P. (2003) Characterisation of the South West European Marine Sites. Plymouth Sound and Estuaries cSAC, SPA. Occasional Publications. Marine Biological Association of the United Kingdom (9) 202p

## 5.3 Appropriate Assessment

### **Water resources**

- 5.3.1 The Water Resource Management Plan (WRMP) of South West Water<sup>34</sup> (2014) indicates that there will be a surplus of supply over demand to 2040 as a result of demand management measures and further investment in water supply infrastructure. The Water Resource Management Plan sets out the agreed strategy for providing water resources and is approved by the Environment Agency and The Regulator (Ofwat). Most of Cornwall falls within the Colliford Strategic Supply Area. The exception is the north-west of the County around Bude, which falls within the Roadford Strategic Supply Area. South West Water in preparing their Water Resource Management Plan took into account the conclusions of the Environment Agency's Review of Consents process. This process involves the Environment Agency examining all the abstraction licences they allow in order to determine whether any reductions in abstraction volume/rate are required in order to avoid adverse effects on European sites.
- 5.3.2 The HRA screening report for the South West Water WRMP (2014) concluded that the WRP is unlikely to have significant effects upon these sites but that further review of some of the options should be undertaken in the future when they are brought forward for implementation.

### **Water quality**

#### Fal and Helford SAC

- 5.3.3 Carnon Downs STW, Falmouth STW, Lanner St. Day STW, Mylor Bridge STW, St. Stephen (Coombe STW), and Truro (Newham STW) will all probably receive new dwellings within their catchments under the Local Plan. Unless it can be confirmed that the proposed levels of development can be accommodated within the existing consents at these STW's then it would not be possible to confirm that no adverse effects on the integrity of the SAC would result from development.

#### Plymouth Sound & Estuaries SAC

- 5.3.4 Torpoint STW will probably receive new dwellings within its catchment under the Local Plan. Unless it can be confirmed that the proposed levels of development can be accommodated within the existing consent at this STW then it would not be possible to confirm that no adverse effects on the integrity of the SAC would result from development.

#### River Camel SAC

- 5.3.5 Camelford, Bodmin (Scarlett's Wells) and Delabole STWs will all probably receive new dwellings within their catchments under the Local Plan. Unless it can be confirmed that the proposed levels of development can be accommodated within the existing consents at these STW's then it would not be possible to confirm that no adverse effects on the integrity of the SAC would result from development.
- 5.3.6 South West Water confirmed to the Council that they can deal with the level of development proposed with the further significant changes. Natural England and the Environment Agency (EA) have completed work on water quality issues and reported that *'housing growth in Bodmin, up to the current permitted flow of the STW (approximately 1550 homes) is dependent on the improvements to Nanstallon STW which have been included in PR14 and the South West Water Business Plan, to protect the integrity of the River Camel SAC. Development beyond the current permitted flow of the STW would require a permit variation and through this process the EA will ensure that there is no adverse effect on the River Camel as a result. Although currently operating within permit limits, to deliver the planned growth in Camelford, permit variations at the Camelford STW and necessary infrastructure implements will be required within the plan to ensure no adverse effects on the integrity of the River SAC. For the River Allen, a tributary of the Camel, it is not possible to confirm with sufficient confidence that related growth can be accommodated without deterioration in downstream water quality. However, the investigation on the River Allen (submitted in PR14 and included in SWW business plan) will clarify whether further investment in phosphorous (P) stripping at St Mabyn STW, St Teath STW or Delabole STW is required to achieve the progress targets set out in the RBMP2 and the River Camel SAC conservation objective targets by 2027, and avoid impacts of further growth. It is considered that a short term minor increase in phosphorous concentrations associated within a limited*

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<sup>34</sup> South West Water (2014). South West Water Water Resources Management Plan June 2014. 2015 – 2040. [accessed 12/01/16]

*number of new home may not considered likely to result in an adverse effect on integrity on the target features if measures are in place to significantly improve water quality in the medium to long term<sup>35</sup>.*

5.3.7 Following this consultation with South West Water and Natural England, it has been agreed that provided residential development within Bodmin and Camelford CNAs is phased to allow investigations to be completed and any necessary improvements required to be provided, likely significant effects arising from the increases in development within the further significant changes document should not result. In response to this, Policy 28 (Infrastructure) states *'Development will be permitted where: It would be supported by appropriate infrastructure provided in a timely manner.'* This implies that the provision of new development will only be permitted provided suitable infrastructure (such as a suitable capacity of a STW) is in place to ensure no likely significant effects arise. This approach is supported within the supporting text of Policy 28 within paragraph 2.159 of the Local Plan Strategic Policies further significant changes Document: *'The council will work in partnership with internal and external infrastructure providers; neighbouring authorities; and the Local Enterprise Partnership to ensure that new or improved infrastructure, including that listed in the infrastructure needs assessment schedules, is delivered prior to, or in conjunction with, new development.'* This is supported by Policy 1 (Presumption in favour of sustainable development): *'We will work with applicants, infrastructure providers and the local community to find solutions which mean that proposals will be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.'* It can be concluded that with these policies in place, new development within the further significant changes document will not result in likely significant effects upon the River Camel SAC as a result of reductions in water quality from increased sewage outputs and this impact pathway can be screened out.

## 5.4 Other plans and projects

5.4.1 The principal other projects and plans are the existing abstraction licences and discharge consents held by the statutory water company and other abstractors/dischargers. However, these have all been subjected to assessment under the Review of Consents process and deemed acceptable. Moreover, they will be taken into account in the water companies Water Resource Management Plan process and the Environment Agency's permitting process. They would however form the baseline against which any changes to consents would need to be assessed.

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<sup>35</sup> URS (2014). Cornwall Local Plan Habitat Regulations Assessment (HRA)

## 6 Coastal Squeeze

### 6.1 Introduction

6.1.1 Within the previous iteration of this HRA, this impact pathway was screened out. The further significant changes Document does not provide development within new settlements that could result in coastal squeeze. Following consultation with Natural England the new Falmouth Bay to St Austell Bay pSPA requires inclusion.

### 6.2 European site background

6.2.1 The Shoreline Management Plan (SMP) that covers Cornwall is the Rame Head to Hartland Point SMP. A review of the SMP has led to a second plan (SMP2). The following Management Units are of relevance to Falmouth Bay to St Austell Bay pSPA.

#### Falmouth Bay to St Austell Bay pSPA<sup>36</sup>

- Undefended Estuary banks at MA11 (No Active Intervention); St. Mawes (Hold the Line); St Just-in-Roseland (Hold the Line); Restronguet Passage (No Active Intervention); Devoran and Perranarworthal (Managed Retreat); Mylor Quay (Hold the Line); Mylor Bridge (No Active Intervention); Flushing (Hold the Line with localised Managed Retreat); Penryn (Hold the Line); Falmouth (Hold the Line); Pendennis Point (No Active Intervention); Ruan Lanihorne (No Active Intervention); Tresillian (Hold the Line); Truro Upper Basin (Hold the Line/Managed Retreat); Calenick Creek (Managed Retreat); Undefended cliff section at MA11 (No Active Intervention); Castle Beach and Gyllyngvase (Hold the Line); Swanpool (Hold the Line); Maenporth (Hold the Line); Undefended Estuary Banks (and including undefended estuary communities) (No Active Intervention with Managed Retreat); Durgan (No Active Intervention); Helford Passage (No Active Intervention); Gweek Quays (Hold the Line); Gweek (Managed Retreat); Helford (No Active Intervention); Flushing (No Active Intervention); Gillan (No Active Intervention); Porthallow (Hold the Line); Porthoustock (No Active Intervention); Undefended cliffs at MA06 (No Active Intervention), Polkerris (No Active Intervention with localised Hold the Line); Par Sands (No Active Intervention); Par Docks (Managed Retreat); Undefended Cliff at MA08 (No Active Intervention); Pentewan Harbour & Village (Managed Retreat); Pentewan Beach (No Active Intervention); Mevagissey (Hold the Line); Portmellon (Hold the Line); Gorran Haven (Hold the Line); Undefended cliffs & coves at MA09 (No Active Intervention); Hemmick Beach (Managed Retreat); Caerhays Beach (Managed Retreat); East Portholland (No Active Intervention); West Portholland (No Active Intervention); Portloe (Hold the Line); Undefended cliffs & coves at MA10 (No Active Intervention); Pendower East (Managed Retreat); Pendower West (No Active Intervention); Portscatho (Hold the Line).

6.2.2 As detailed within the previous iteration of this HRA, decisions on coastal defence strategies are made independently of the Local Plan. In terms of consideration of potential impacts, the Local Plan would have potential to affect European sites with any requirements for development that would lead to a policy of 'Hold The Line' or 'Advance The Line' and where this would conflict with the coastal strategy. Additionally, any proposed development in an area identified for 'managed retreat' within the SMP or in an area listed within the Environment Agency Regional Habitat Creation programme would also lead to a requirement for further consideration as part of the HRA.

### 6.3 Appropriate Assessment

6.3.1 Specific site allocations are not made within the Local Plan. However, there is no reason to conclude that any of the dwellings that will be allocated within Cornwall would require placement in locations that would compromise natural coastal processes or managed retreat initiatives. Moreover, Policy 26 (Flood Risk Management and Coastal Change) already identifies that '*Development should take account of and be consistent with any adopted strategic and local flood and coastal management strategies*'.

<sup>36</sup> Note some overlap with Fal and Helford SAC.

## **6.4 Other plans and projects**

- 6.4.1 The principal other plans and projects of relevance to this HRA are the Shoreline Management Plan for Plymouth (the South Devon and Dorset (Durlston Head to Rame Head) SMP) and Coastal Strategies for the Cornwall coastline. However, since the Local Plan does not include any policy or allocation that would require establish coastal defence policy as set out in the SMP and Coastal Strategies to change, or which would affect coastal policy at all, there is no basis on which an in combination effect would be triggered.

## **6.5 Conclusion**

- 6.5.1 It can therefore be concluded that there will be no adverse effect on the integrity of any European sites through this pathway.

## Appendix A. Locations of Internationally Designated Sites

## Appendix B. Air quality calculations

In the tables below 'Do Minimum' is the expected growth by 2030 minus the Plan development, while 'Do Something' is the total expected growth. The difference between 'Do Min' and 'Do Some' is therefore the contribution of the Local Plan.

The GAP analysis methodology is not compatible with outputs from the DMRB Screening Tool; therefore the principles have been used in this assessment rather than the exact methodology. The results set out in the tables below assume 2030 traffic flows, with 2010 emission rates, and 2010 background data.

**Table 1: NO<sub>x</sub> Concentrations at Breney Common Goss and Tregoss Moors SAC**

| Distance from named link* (m) | Annual Mean NO <sub>x</sub> (µg/m <sup>3</sup> ) |                   |                         | Change(µg/m <sup>3</sup> ) | PC as percentage of Critical Level (30 µg/m <sup>-3</sup> ) | PEC as percentage of Critical Level |
|-------------------------------|--|-------------------|-------------------------|----------------------------|---|-------------------------------------|
|                               | 2010 Base  | 2030** Do-Nothing | 2030** Do-Minimum (PEC) | Do-Some – Do-Min (PC)      |   |                                     |
| 20                            | 23.51  | 27.08             | 29.52                   | +2.43                      | 8.1   | 98                                  |
| 70                            | 16.45  | 17.91             | 18.89                   | +0.97                      | 3.2   | 63                                  |
| 120                           | 14.81  | 15.72             | 16.33                   | +0.61                      | 2.0   | 54                                  |

\* This is distance from named road (A30 WB). Other roads included within calculation if within 200m

\*\* Calculation carried out for 2025 as that is the limit of the emission factor tools

**Table 2: NO<sub>x</sub> Concentrations at River Camel SAC; adjacent to A30**

| Distance from named link* (m) | Annual Mean NO <sub>x</sub> (µg/m <sup>3</sup> ) |               |                      | Change (µg/m <sup>3</sup> ) | PC as percentage of Critical Level (30 µg/m <sup>-3</sup> ) | PEC as percentage of Critical Level |
|-------------------------------|--|---------------|----------------------|-----------------------------|---|-------------------------------------|
|                               | 2010 Base  | 2030** Do-Min | 2030** Do-Some (PEC) | Do-Some – Do-Min (PC)       |   |                                     |
| 44                            | 20.93  | 22.89         | 24.20                | +1.31                       | 4.4   | 81                                  |
| 94                            | 18.43  | 19.60         | 20.38                | +0.78                       | 2.6   | 68                                  |
| 144                           | 17.40  | 18.22         | 18.77                | +0.54                       | 1.8   | 63                                  |

\* This is distance from named road (A30 EB). Other roads included within calculation if within 200m

\*\* Calculation carried out for 2025 as that is the limit of the emission factor tools

**Table 3: NO<sub>x</sub> Concentrations at Newlyn Downs SAC**

| Distance from named link* (m) | Annual Mean NO <sub>x</sub> (µg/m <sup>3</sup> ) |               |                      | Change (µg/m <sup>3</sup> ) | PC as percentage of Critical Level (30 µg/m <sup>-3</sup> ) | PEC as percentage of Critical Level |
|-------------------------------|--|---------------|----------------------|-----------------------------|---|-------------------------------------|
|                               | 2010 Base  | 2030** Do-Min | 2030** Do-Some (PEC) | Do-Some – Do-Min (PC)       |   |                                     |
| 199                           | 11.89  | 12.29         | 12.72                | +0.43                       | 1.4   | 42                                  |

\* This is distance from named road (A30 EB). Other roads included within calculation if within 200m

\*\* Calculation carried out for 2025 as that is the limit of the emission factor tools

**Table 4: Nitrogen Deposition Rates at Breney Common Goss and Tregoss Moors SAC**

| Distance from named link*<br>(m) | Year         | Nitrogen deposition rate (kg N/ha/yr) |                            |                                      |
|----------------------------------|--------------|---------------------------------------|----------------------------|--------------------------------------|
|                                  |              | Road Contribution                     | Average Rate in 5km square | Total                                |
| 20                               | 2010 Base    | 0.59                                  | 19.88                      | 20.47                                |
|                                  | 2030** DN    | 0.76                                  | 19.88                      | 20.64                                |
|                                  | 2030** DM    | 0.88                                  | 19.88                      | 20.23                                |
|                                  | <b>DM-DN</b> | -                                     | -                          | <b>+0.05 (0.5% of critical load)</b> |
|                                  | DM-Base      | -                                     | -                          | +0.12                                |
| 70                               | 2010 Base    | 0.23                                  | 19.88                      | 20.11                                |
|                                  | 2030** DN    | 0.30                                  | 19.88                      | 20.18                                |
|                                  | 2030** DM    | 0.35                                  | 19.88                      | 20.23                                |
|                                  | <b>DM-DN</b> | -                                     | -                          | <b>+0.05 (0.5% of critical load)</b> |
|                                  | DM-Base      | -                                     | -                          | +0.12                                |
| 120                              | 2010 Base    | 0.14                                  | 19.88                      | 20.02                                |
|                                  | 2030** DN    | 0.19                                  | 19.88                      | 20.07                                |
|                                  | 2030** DM    | 0.22                                  | 19.88                      | 20.10                                |
|                                  | <b>DM-DN</b> | -                                     | -                          | <b>+0.03 (0.3% of critical load)</b> |
|                                  | DM-Base      | -                                     | -                          | +0.07                                |
| <b>Critical Load</b>             |              |                                       |                            | <b>10</b>                            |

\* This is distance from named road (A30 EB). Other roads included within calculation if within 200m

\*\* Calculation carried out for 2025 as that is the limit of the emission factor tools

**Table 5: Nitrogen Deposition Rates at River Camel SAC; adjacent to A30**

| Distance from named link*<br>(m) | Year              | Nitrogen deposition rate (kg N/ha/yr) |                            |                                       |
|----------------------------------|-------------------|---------------------------------------|----------------------------|---------------------------------------|
|                                  |                   | Road Contribution                     | Average Rate in 5km square | Total                                 |
| 44                               | 2010 Base         | 0.31                                  | 31.50                      | 31.81                                 |
|                                  | 2030** DN         | 0.41                                  | 31.50                      | 31.91                                 |
|                                  | 2030** DM (PEC)   | 0.47                                  | 31.50                      | 31.97                                 |
|                                  | <b>DM-DN (PC)</b> | -                                     | -                          | <b>+0.07 (0.07% of critical load)</b> |
|                                  | DM-Base           | -                                     | -                          | +0.16                                 |
| 94                               | 2010 Base         | 0.18                                  | 31.50                      | 31.68                                 |
|                                  | 2030** DN         | 0.24                                  | 31.50                      | 31.74                                 |
|                                  | 2030** DM (PEC)   | 0.28                                  | 31.50                      | 31.78                                 |
|                                  | <b>DM-DN (PC)</b> | -                                     | -                          | <b>+0.04 (0.4% of critical load)</b>  |
|                                  | DM-Base           | -                                     | -                          | +0.10                                 |
| 144                              | 2010 Base         | 0.13                                  | 31.50                      | 31.63                                 |
|                                  | 2030** DN         | 0.17                                  | 31.50                      | 31.67                                 |
|                                  | 2030** DM (PEC)   | 0.20                                  | 31.50                      | 31.70                                 |
|                                  | <b>DM-DN (PC)</b> | -                                     | -                          | <b>+0.03 (0.3% of critical load)</b>  |
|                                  | DM-Base           | -                                     | -                          | +0.07                                 |
| <b>Critical Load</b>             |                   |                                       |                            | <b>10</b>                             |

\* This is distance from named road (A30 EB). Other roads included within calculation if within 200m

\*\* Calculation carried out for 2030 as that is the limit of the emission factor tools

**Table 6: Nitrogen Deposition Rates at Newlyn Downs SAC**

| Distance from<br>named link*<br>(m) | Year               | Nitrogen deposition rate (kg N/ha/yr) |                               |  |
|-------------------------------------|--------------------|---------------------------------------|-------------------------------|--|
|                                     |                    | Road<br>Contribution                  | Average Rate in 5km<br>square | Total                                    |
| 199                                 | 2010 Base          | 0.09                                  | 19.88                         | 19.97                                    |
|                                     | 2030** DN          | 0.11                                  | 19.88                         | 19.99                                    |
|                                     | 2030** DM<br>(PEC) | 0.13                                  | 19.88                         | 20.01                                    |
|                                     | <b>DM-DN (PC)</b>  | -                                     | -                             | <b>+0.02 (0.2% of<br/>critical load)</b> |
|                                     | DM-Base            | -                                     | -                             | +0.04                                    |
| <b>Critical Load</b>                |                    |                                       |                               | <b>10</b>                                |

\* This is distance from named road (A30 EB). Other roads included within calculation if within 200m

\*\* Calculation carried out for 2025 as that is the limit of the emission factor tools

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