

# Strategic Environmental Assessment for the St Newlyn East & Mitchell Neighbourhood Plan

Environmental Report to accompany the  
pre-submission 'Regulation 14 version' of  
the neighbourhood plan

January 2023

## Quality information

<u>Prepared by</u>	<u>Checked by</u>	<u>Verified by</u>	<u>Approved by</u>
FY Graduate Environmental Consultant	RC Senior Environmental Planner	NCB Technical Director	NCB Technical Director
EY Graduate Environmental Consultant			

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Prepared for:

St Newlyn East Parish Council

Prepared by:

AECOM Limited  
3rd Floor, Portwall Place  
Portwall Lane  
Bristol BS1 6NA  
United Kingdom

T: +44 117 901 7000  
aecom.com

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## Table of Contents

Non-Technical Summary (NTS).....	i
Introduction.....	1
1. Introduction .....	2
2. What is the StNEM NP seeking to achieve? .....	4
3. What is the scope of the SEA? .....	9
Part 1: What has plan-making / SEA involved to this point? .....	10
4. Introduction (to Part 1) .....	11
5. Establishing alternatives .....	12
6. Assessing alternatives .....	19
7. Establishing the preferred approach.....	21
Part 2: what are the SEA findings at this stage? .....	22
8. Introduction (to Part 2) .....	23
9. Appraisal of the draft StNEM NP .....	25
Part 3: What are the next steps? .....	36
10. Next steps and monitoring .....	37
Appendix A Regulatory requirements.....	38
Appendix B Scoping information .....	43
Appendix C Reasonable alternatives assessment .....	55

# Non-Technical Summary (NTS)

## Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging St Newlyn East & Mitchell Neighbourhood Plan (StNEM NP).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. The StNEM NP has been screened in by Cornwall Council as requiring a full SEA process.

The StNEM NP is being prepared by the Parish Council in the context of the Cornwall Local Plan (2016). Once 'made' the StNEM NP will have material weight when deciding on planning applications, alongside the Cornwall Local Plan.

The Neighbourhood Plan is at an advanced stage of preparation, with this SEA Environmental Report, accompanying the Pre-Submission version of the Neighbourhood Plan.

## Structure of the Environmental Report

SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SEA involved **up to this point?**  
- including in relation to 'reasonable alternatives'.
2. What are the SEA findings **at this stage?**  
- i.e. in relation to the draft plan.
3. What happens **next?**

Each of these questions is answered in turn within a discrete 'part' of the Environmental Report and summarised within this NTS. However, firstly there is a need to set the scene further by answering the questions 'What is the Plan seeking to achieve?' and 'What's the scope of the SEA?'

## What is the Plan seeking to achieve?

The StNEM NP has produced the following vision statement:

*A distinctive and attractive place to live, work and visit, with a community aware and engaged in achieving a more sustainable way of living.*

This is supported by a total of 58 objectives for the StNEM NP spanning the themes of: natural environment and countryside; built environment; housing; transport and travel; community services and facilities; and recreation and sport.

## What is the scope of the SEA?

The scope of the SEA is reflected in a list of themes, objectives, and assessment questions, which, taken together indicate the parameters of the SEA and provide a methodological ‘framework’ for assessment. A summary framework is presented overleaf, and a full framework which includes assessment questions is provided within Appendix B of the main Environmental Report.

SEA theme	SEA objective
<b>Biodiversity and geodiversity</b>	Protect and enhance biodiversity and geodiversity sites and features, by avoiding impacts on regionally and locally designated sites, and delivering demonstrable biodiversity net gains.
<b>Climate change and flood risk</b>	Reduce the contribution to climate change made by activities within the Neighbourhood Area.
	Support the resilience of the Neighbourhood Area to the potential effects of climate change, including flooding.
<b>Community wellbeing</b>	Ensure growth in the Parish is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
<b>Historic environment</b>	To protect, conserve and enhance the historic environment within and surrounding the Neighbourhood Area.
<b>Land, soil, and water resources</b>	Promote sustainable management of soils and efficient land use.
	Protect and enhance water quality and use and manage water resources in a sustainable manner.
<b>Landscape</b>	To protect and enhance the character and quality of the immediate and surrounding landscape.
<b>Transportation and movement</b>	Promote sustainable transport use and reduce the need to travel.

## Plan-making / SEA up to this point

An important element of the required SEA process involves assessing ‘reasonable alternatives’ in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the Environmental Report explains how work was undertaken to develop and assess a ‘reasonable’ range of alternative approaches for the StNEM NP.

Specifically, Part 1 of the report –

4. Explains the process of establishing the reasonable alternatives;
5. Presents the outcomes of assessing the reasonable alternatives; and
6. Explains reasons for developing a preferred option, in light of the assessment.

## Establishing the alternatives

The context provided by the Local Plan confirms that St Newlyn East does not need to deliver any further housing in order to be in conformity with the minimum housing figure set out for the area. While there is no outstanding need, the community's preferred long-term sustainable development strategy is to allocate sites for development within the plan period. This is to increase housing options by: widening the mix of dwellings; provide more local job opportunities; and enable the first stage of a link road to take vehicular traffic away from village centre. The Parish Council have looked at average of homes built over the years and what would be appropriate for the developer in order to deliver the road for St Newlyn East.

Three reasonable alternative spatial strategy options have been explored for the purposes of the SEA. These alternatives reflect findings of the AECOM Site Options Assessment (SOA) (2020), and any updates in terms of site suitability/ availability since then.

The three options are set out below. Option A is a low growth option, while Option B capitalises upon the shared land owner land ownership of sites 3 and 4 to deliver economy of scale for enable the delivery of the sought after village link road. Option C considers growth in Mitchell. The spatial distribution of options can be seen within Figures 5.3 – 5.5 of the main report.

**Table NTS.1 Reasonable alternative spatial strategy options**

Site	Option A	Option B	Option C
1	43		
3 & 4		120	
8			63
9	5	5	5
10			21
<b>Total</b>	<b>48</b>	<b>130 – 140</b>	<b>89</b>

## Assessing the alternatives

The assessment of spatial strategy options is presented in Appendix A of this report, with summary findings presented in Chapter 6. The assessment considers any potential effects that may arise as a result of development at these locations, including the key environmental constraints and opportunities present. In this context the options have been considered in relation to the SEA Framework developed during SEA Scoping and the baseline information.

The overall conclusions of the assessment are set out overleaf.

**Table NTS.2 Summary findings – reasonable alternatives assessment**

SEA theme		Option A	Option B	Option C
		Site 1 and Site 9	Site 3/4 and Site 9	Site 8, Site 9 and Site 10
Biodiversity	Likely significant effect	No	No	No
	Rank	1	2	3
Climate change	Likely significant effect	No	Yes - positive	No
	Rank	2	1	3
Landscape	Likely significant effect	Yes - negative	Yes - negative	Yes - negative
	Rank	2	3	1
Historic environment	Likely significant effect	No	No	Yes - negative
	Rank	2	1	3
Land, soil and water resources	Likely significant effect	Yes – negative	Yes – negative	Yes - negative
	Rank	1	3	2
Community wellbeing	Likely significant effect	No	No	No
	Rank	2	1	3
Transportation	Likely significant effect	No	Yes - positive	No
	Rank	2	1	2

**Summary commentary:**

The assessment has highlighted the potential effects as a result of development across the three options. All options have the potential to adversely impact on the Penhale Dunes SAC and the Fal and Helford SAC through impacts on water quality and resources, and air pollution. To support the development of the StNEM NP, a habitats regulations assessment (HRA), including an appropriate assessment (AA) has been undertaken. Impacts on the SACs from plan proposals have therefore been considered through the HRA/AA process, and recommendations made. Option B will require consultation with Natural England given site 3/4 overlaps with SSSI IRZs for the type of development likely to be brought forward, and Option C could result in biodiversity loss due to hedgerow removal to allow for access. It is also recognised that all options will be required to deliver a 10% biodiversity net gain, and that landscape-led masterplanning at sites could support improvements to the biodiversity in the long term.

In terms of the landscape, all options could result in changes to the baseline, specifically changes to the setting of protected landscapes. Options have the potential to impact upon the existing settlement pattern and character through greenfield development outside of the built up area, with Option B identified as the least favourably performing in this respect. This also reflects the sensitivities identified through the AECOM SOA (2022).

In terms of heritage, Option C has the potential to impact the Mitchell Conservation Area through sites 8 and 10. Option A is also constrained by designated assets with significance for the historic environment, and therefore Option B is best performing in relation to this SEA theme. It is recognised mitigation through sensitive design, landscaping and screening methods are likely to reduce residual effects to some extent.

All options will result in the loss of BMV greenfield land, with the potential for long term negative effects on soil resources. Options are ranked by area of landtake, with Option B therefore performing worst in this respect..

## Developing the preferred approach

St NEMNP Parish Council have set out a number of reasons for selection and rejection of the three reasonable alternative spatial strategy options assessed through the SEA. These can be found within Chapter 7 of the main report.

The conclusion reached by the Parish Council, in light of the SEA, is that Option B remains a viable development option if the community is prepared to accept the loss of up to 6ha of greenfield land to provide more dwellings and grow the village population.

The Parish Council further highlights that consultation to be carried out as part of the next stage of plan-making will be used to seek confirmation from the community that this remains the case.

## Assessment findings at this stage

Part 2 of the Environmental Report presents an assessment of the Pre-Submission version of the StNEM NP. Assessment findings are presented as a series of narratives under the 'SEA framework' theme headings. The following overall conclusions and recommendations are reached:

### Conclusions

The assessment has concluded that the Regulation 14 version of the Neighbourhood Plan is likely to lead to **significant positive effects** in relation to the 'Community Wellbeing' SEA theme. This reflects the focus of the StNEM NP on delivering housing, including affordable housing, to meet local needs; and safeguarding and enhancing local infrastructure, including the provision of a link road to support accessible, connected neighbourhoods. The plan also performs positively through allocating land for employment and regeneration, supporting business development to enhance the local economy.

The Neighbourhood Plan is also likely to lead to **significant positive effects** in relation to the 'Transportation' SEA theme. These benefits largely relate to the StNEM NP's emphasis on enhancing more active travel infrastructure, and the delivery of a link road which will substantially reduce the traffic that traverses the centre of the village of St Newlyn East. Focus is placed on improving the pedestrian experience within the town and local centre destinations with the potential for long term positive effects. This includes supporting a modal shift towards sustainable transport and providing a more reliable and resilient public transport network.

Regarding the 'Climate Change' SEA theme, the StNEM NP will potentially lead to **minor positive effects** through delivering strategic, sustainable growth that is supported by necessary infrastructure. Notably this includes the delivery of a link road which will enhance the conditions for walking and cycling, which are lower carbon modes of transport. Furthermore, the policy framework seeks to support proposals which deliver renewable energy generating infrastructure, and include low carbon energy sources to contribute towards addressing the global climate crisis. However, positive effects are dependent on the extent to which development proposals incorporate these mitigation and adaptation measures through design.

Additionally, assuming recommendations set out through the HRA (2022) are adopted, it is considered that the draft StNEM NP will bring **broadly neutral effects** in relation to the 'Biodiversity' SEA theme. The policy framework seeks to protect and



enhance ecological networks, and deliver net gains in accordance with national policy.

Considering the 'Historic Environment' SEA theme, there remains a potential for **residual negative effects** on key views and heritage assets, however these are **not likely to be significant**, with most growth directed to an area of less sensitivity and being supported by appropriate policy requirements. This includes ensuring suitability and quality of design – which will likely minimise impacts on the setting of key views within the conservation areas. The delivery of a link road alongside new housing could lead to **long term positive effects** on the historic environment through removing traffic from the village centre. This would likely enhance the setting of the historic villagescape character, the conservation area and the fabric and setting of designated and non designated features of historic significance.

Greenfield expansion at land off Halt Road is considered likely to lead to **residual negative effects** in relation to the 'Landscape' SEA theme. These will **not be significant** in nature, as the StNEM NP places an emphasis on protecting and enhancing the special qualities of the parish, supporting the quality of the public realm, and incorporating high-quality and sensitive design through development proposals. Furthermore, it is considered that the delivery of a link road alongside new housing will remove congestion and bottlenecks through the village, which may offset any temporary negative effects on the local landscape. This has the potential to lead to **positive effects in the long term**, improving the local villagescape character and protecting the special qualities of the StNEM NP area .

The Neighbourhood Plan will initiate several beneficial approaches for the 'Land, Soil and Water Resources' SEA theme through the implementation and application of SuDS, and supporting for redevelopment of brownfield sites and/or re-use of existing buildings. However, given the loss of approximately 6ha of greenfield and BMV agricultural land, **significant negative effects** are anticipated.

## Recommendations

The SEA supports the recommendations set out in the HRA AA (2022). The AA recommended that a paragraph referencing Policy 22 of the Cornwall Local Plan is added to Policy No. NEM1. As an example, text could include "All development within St. Newlyn Parish must adhere to Policy 22 of the Cornwall Local Plan and provide SAMM contributions per dwelling with regards to mitigation recreational pressure on Penhale Dunes SAC and Fal & Helford SAC, in line with the European Sites Mitigation SPD (2021) or any subsequent document".

With this recommendation implemented the HRA concludes that the St. Newlyn East Neighbourhood Plan will not have an adverse effect on the integrity of any European sites in Cornwall, either alone or in combination with other plans and projects.

## Next steps

Part 3 of this Environmental Report explains the next steps that will be taken as part of plan-making and SEA.

## Plan finalisation

Following consultation, and any necessary updates, the Environmental Report will accompany the St NEMNP for submission to the Local Planning Authority, Cornwall Council, for subsequent Independent Examination.

If the Independent Examination is favourable, the StNEM NP will be subject to a referendum, organised by Cornwall Council. If more than 50% of those who vote agree with the StNEM NP, then it will be 'made'. Once made, the StNEM NP will become part of the development plan for the neighbourhood area.

## Monitoring

The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Cornwall Council as established as part of the Local Plan process, and as part of the process of preparing its Annual Monitoring Report (AMR).

# Introduction

# 1. Introduction

## Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging St Newlyn East & Mitchell Neighbourhood Development Plan (StNEM NP).
- 1.2 The STNEM NP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The StNEM NP is being prepared in the context of the adopted Cornwall Local Plan (2016), the key documents of which include the Strategic Policies (2010-2030), Site Allocations Development Plan Document (DPD) and the Minerals Safeguarding DPD.
- 1.3 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the StNEM NP is a legal requirement.<sup>1</sup>

## SEA explained

- 1.4 It is a requirement that SEA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.5 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that “identifies, describes and evaluates” the likely significant effects of implementing “the plan, and reasonable alternatives”.<sup>2</sup> The report must then be considered, alongside consultation responses, when finalising the plan.
- 1.6 More specifically, the Report must answer the following three questions:
  1. What has plan-making / SEA involved up to this point?  
including in relation to 'reasonable alternatives'.
  2. What are the SEA findings at this stage?  
i.e., in relation to the draft plan.
  3. What happens next?

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<sup>1</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations').

<sup>1</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

<sup>2</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

## **This Environmental Report**

- 1.7 This Environmental Report is published alongside the 'pre-submission' version of the StNEM NP, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.8 This report essentially answers questions 1, 2 and 3 in turn, to provide the required information. Each question is answered within a discrete 'part' of the report.
- 1.9 However, before answering Q1, two initial questions are answered to further set the scene; what is the plan seeking to achieve? And what is the scope of the SEA?

## 2. What is the StNEM NP seeking to achieve?

### Introduction

This section considers the strategic planning policy context provided by the adopted Cornwall Local Plan, and then presents the vision and objectives of the StNEM NP.

Figure 2.1 below presents the neighbourhood area.

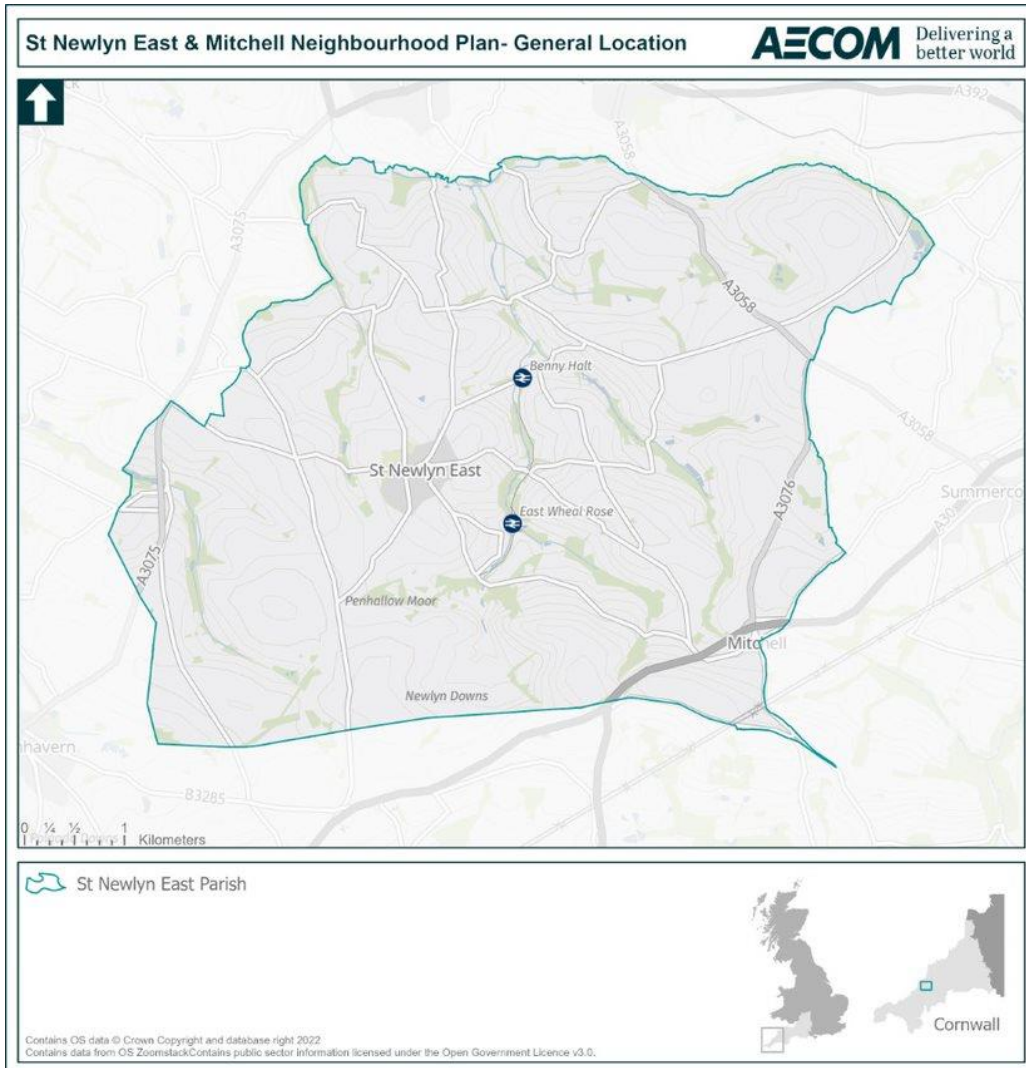


Figure 2.1 St Newlyn East and Mitchell Neighbourhood Area

## Strategic planning context

### Cornwall Local Plan

- 2.1 The overarching document for the Cornwall Local Plan, the Cornwall Local Plan: Strategic Policies 2010-2030<sup>3</sup>, was adopted in November 2016. This sets out the land use policies to meet Cornwall's economic, environmental and social needs and aims for the future, and provides the framework for all subsequent documents which form part of the Local Plan.
- 2.2 The Local Plan is intended to help deliver the vision and objectives of 'Future Cornwall', Cornwall Council's sustainable community strategy. The underlying principles of the strategy seek to manage future development to ensure all communities in Cornwall have an appropriate balance of jobs, services, facilities and homes. Alongside, and supporting the Local Plan, Community Network Areas (CNAs) have been established to act as a local focus for debate and engagement. CNAs, which cover 16 broad areas in Cornwall, provide the basis for the place-based element of Local Plan's policy framework. St Newlyn East is located within the St Agnes and Perranporth CNA.
- 2.3 The Local Plan has set minimum housebuilding and employment land targets for each 'community network area' and the main towns of the county to achieve. This figure was disaggregated by the local planning authority for each CNA and for sub-areas within the CNA. For housing, the target across the rural parts of the St Agnes & Perranporth CNA was 1,100 new dwellings between 2010 and 2031. This target was met by 2020. In October 2021 Cornwall Council confirmed that "St Newlyn East does not need to deliver any further housing in order to be in conformity with the minimum housing figure from the Cornwall Local Plan".

### Site allocations DPD

- 2.4 Cornwall Council has prepared a Site Allocations Development Plan Document<sup>4</sup> to support the delivery of objectives within the Local Plan. The purpose of the Site Allocations DPD is to allocate land for a range of uses to meet the growth targets for the main towns in Cornwall, relating to housing growth, commercial growth and enabling infrastructure.
- 2.5 No specific sites are allocated within St Newlyn East. However, Policy 3 (Role and Function of Places) states that outside of main towns, an appropriate mechanism for delivering housing and employment growth for the remainder of the CNA housing requirement is through the identification of sites through Neighbourhood Plans.
- 2.6 Other key policies relevant to the St Newlyn East Neighbourhood Plan presented in the Strategic Policies include as follows:
- 2.7 Policy 1 (Presumption in Favour of Sustainable Development): Planning applications that accord with the policies in the Local Plan and supporting Development Plan (including, where relevant, with policies in Neighbourhood

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<sup>3</sup> Cornwall Council (2016): 'Cornwall Local Plan Strategic Policies 2010-2030', [online] available to download via: <https://www.cornwall.gov.uk/localplancornwall>

Plans) will be regarded as sustainable development and be approved, unless material considerations indicate otherwise.

- 2.8 Policy 5 (Business and Tourism): Neighbourhood Plans should identify new land, and safeguard appropriate existing land, necessary for the delivery of the economic strategies for Cornwall. Locally Significant Employment Sites are sites which make a significant contribution in terms of space or job provision within a Neighbourhood Plan area.
- 2.9 Policy 8 (Affordable Housing): All new housing schemes on sites where there is a net increase of more than 10 dwellings or where dwellings would have a combined gross floorspace more than 1,000 square metres (not including replacement dwellings) must contribute towards meeting affordable housing need. Located in Affordable Housing 'Value Zone' 4, St Newlyn East will be expected to deliver 30% of homes as affordable housing.
- 2.10 Neighbourhood plans will form part of the development plan for Cornwall, alongside, but not as a replacement for the Local Plan. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Cornwall, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

## StNEM NP vision and objectives

- 2.11 The vision statement (below) reflects the StNEM community's regard for the future of the area and purpose in preparing a neighbourhood plan to guide future development:

*A distinctive and attractive place to live, work and visit, with a community aware and engaged in achieving a more sustainable way of living.*

- 2.12 The aims and objectives set out in Table 2.1 below, reflect the community's neighbourhood planning and development agenda. It is this agenda that underpins the policies in the StNEM NP.

**Table 2.1 StNEM NP aims and objectives**

Aims	Objectives
<b>Natural Environment and Countryside</b>	
Safeguard the character of local countryside	N1. Respect sensitive wildlife areas
	N2. Protect Cornish walls, hedgerows, and woodlands
	N3. Limit acceptable development in the countryside
	N4. Negotiate renewable energy development
Support local agriculture	N5. Protect higher grade agricultural land
	N6. Encourage responsible farming practices
	N7. Facilitate acceptable forms of farm diversification
Encourage responsible public use of the countryside	N8. Protect and enhance existing public rights of way
	N9. Enable & identify public access to the countryside



## N10. Support sustainable recreation and tourism activity

### Built environment

Strengthen the distinct character of the two main settlements	B1. Improve and enhance village centre environments
	B2. Support pedestrian priority measures
	B3. Reinforce role of the village centre of St Newlyn East
Safeguard heritage assets and the historic environment	B4. Respect local heritage assets
	B5. Ensure development enhances local character
	B6. Protect important local green spaces
Ensure development complements and enhances the existing built environment	B7. Prioritise brownfield sites and re-use of redundant buildings
	B8. Establish design standards, preferences & sustainability
	B9. Promote use of natural boundaries
Facilitate sustainable growth in appropriate locations	B10. Restrict major development to appropriate locations
	B11. Identify preferred development sites
	B12. Ensure proper & future proofing of access to new development
Promote sustainable development and sustainable living	B13. Encourage recycling and renewable energy use
	B14. Prioritise walking and cycling
	B15. Ensure flood risk is addressed properly

### Housing

Enable agreed housing development strategy	H1. Set realistic housing targets
	H2. Influence the scale and type of housing development
	H3. Prioritise local housing needs
	H4. Maintain an appropriate housing mix
Promote high quality living environment	H5. Influence layout and access arrangements
	H6. Establish required standards of design and sustainability
	H7. Encourage a pedestrian-friendly environment
	H8. Ensure adequate provision for parking and servicing
Retain and support local employment activity	E1. Protect existing business premises
	E2. Support new business practices in specific areas
	E3. Assist homeworking
	E4. Encourage re-use of redundant buildings
Promote small-scale business development in suitable locations	E5. Promote local employment opportunities
	E6. Control impact of industrial/commercial activity
	E7. Ensure adequate access and servicing arrangements

### Transport and travel

Encourage sustainable transport use	T1. Support cycle routes for both villages
	T2. Facilitate electric vehicle charging point sites

	T3. Support improved public transport provision
Improve the transport network and local accessibility	T4. Prioritise walking and cycling
	T5. Support the provision of off-road parking
	T6. Address road safety issues
	T7. Improve the local road network and access
	T8. Reduce impact of the car in St Newlyn East village centre

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### **Community Services and Facilities**

Ensure amenities and infrastructure are adequate to meet the needs and demands of a growing and changing population	C1. Support the delivery of local services
	C2. Support provision of first-class electronic communication
	C3. Promote development of community facilities for Mitchell
Protect and enhance existing community facilities	C4. Identify key community facilities to be protected
	C5. Facilitate necessary improvements to existing facilities
Support local renewable energy initiatives	C6. Identify community owned renewable energy potential

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### **Recreation and sport**

Protect and enhance local recreation provision	R1. Safeguard existing play and sports facilities
	R2. Ensure each settlement has adequate play space
	R3. Support new and improved outdoor facilities to meet changing demands
	R4. Facilitate provision of play areas for Mitchell

## 3. What is the scope of the SEA?

### Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SEA, i.e., the sustainability themes and objectives that should be a focus of the assessment of the plan and reasonable alternatives. Further information is presented in Appendix B.

### Consultation

- 3.2 The SEA Regulations require that “when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England. As such, these authorities were consulted earlier this year (October 2022). Scoping responses are detailed in Appendix B.

### The SEA framework

- 3.3 The SEA scope is summarised in a list of themes and objectives, known as the SEA framework. The full SEA framework as broadly agreed earlier in 2022 is provided in Appendix B and Table 3.1 below presents a summary version.

**Table 3.1 Summary SEA framework**

SEA theme	SEA objective
<b>Biodiversity and geodiversity</b>	Protect and enhance biodiversity and geodiversity sites and features, by avoiding impacts on regionally and locally designated sites, and delivering demonstrable biodiversity net gains.
<b>Climate change and flood risk</b>	Reduce the contribution to climate change made by activities within the Neighbourhood Area.  Support the resilience of the Neighbourhood Area to the potential effects of climate change, including flooding.
<b>Community wellbeing</b>	Ensure growth in the Parish is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
<b>Historic environment</b>	To protect, conserve and enhance the historic environment within and surrounding the Neighbourhood Area.
<b>Land, soil, and water resources</b>	Promote sustainable management of soils and efficient land use.  Protect and enhance water quality and use and manage water resources in a sustainable manner.
<b>Landscape</b>	To protect and enhance the character and quality of the immediate and surrounding landscape.
<b>Transportation and movement</b>	Promote sustainable transport use and reduce the need to travel.

## **Part 1: What has plan-making / SEA involved to this point?**

## 4. Introduction (to Part 1)

### Overview

4.1 The aim of this part of the report is to explain work undertaken to develop and assess reasonable alternatives. Whilst work on the StNEM NP has been underway for some time, the aim here is not to provide a comprehensive explanation of work to date, but rather to discuss the evolution of the StNEM NP in association with the SEA process. More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to a particular issue that is of central importance to the plan, namely the allocation of land for housing.

### Why focus on housing growth?

4.2 The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the 'plan and reasonable alternatives taking into account the objectives and geographical scope of the plan'. As in many cases the Parish Council are limited in terms of potential alternatives that can be considered for the StNEM NP, which must be in general conformity with and support the strategic development needs set out in the adopted Local Plan and have regard for the emerging local plan.

4.3 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, in light of the StNEM NP objectives (see para 2.12. This is on the basis that housing growth is known to be a matter of key interest amongst local residents and other stakeholders and that it is also the issue most likely to result in a significant effect. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

4.4 In accordance with the SEA Regulations the Environmental Report must include:

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives/ an outline of the reasons for selecting the preferred approach in light of the alternatives appraised.

4.5 Structure of this part of the report

- Chapter 5 – explains the process of establishing reasonable alternatives
- Chapter 6 – presents the outcomes of assessing reasonable alternatives
- Chapter 7 – explains reasons for establishing the preferred option, in light of the assessment.

## 5. Establishing alternatives

### Introduction

- 5.1 The aim here is to explain a process that led to the establishment of reasonable alternatives, and thereby present “an outline of the reasons for selecting the alternatives dealt with”.

### Strategic context

- 5.2 The Local Plan has set minimum housebuilding and employment land targets for each ‘Community Network Area’ (CNA) and the main towns of the county to achieve. This figure was disaggregated by the local planning authority for each CNA and for sub-areas within the CNA. For housing, the target across the rural parts of the St Agnes & Perranporth CNA (within which the neighbourhood area sits) was 1,100 new dwellings between 2010 and 2031. This target was met by 2020. In October 2021 Cornwall Council confirmed that “St Newlyn East does not need to deliver any further housing in order to be in conformity with the minimum housing figure from the Cornwall Local Plan”
- 5.3 While there is no outstanding need, the community’s preferred long-term sustainable development strategy is to allocate sites for development within the plan period. This is to increase housing options by: widening the mix of dwellings; provide more local job opportunities; and enable the first stage of a link road to take vehicular traffic away from village centre. The Parish Council have looked at average of homes built over the years and what would be appropriate for the developer in order to deliver the road for St Newlyn East.

### Site options

- 5.4 A Site Options Assessment (SOA) was carried out by independent consultants AECOM in 2020. The SOA assessed ten sites as seen in Figures 5.1 and 5.2 overleaf – all were concluded suitable or potentially suitable and therefore all are taken forward for further consideration.

Figure 5.1 Sites assessed through the AECOM site assessment (St Newlyn East)

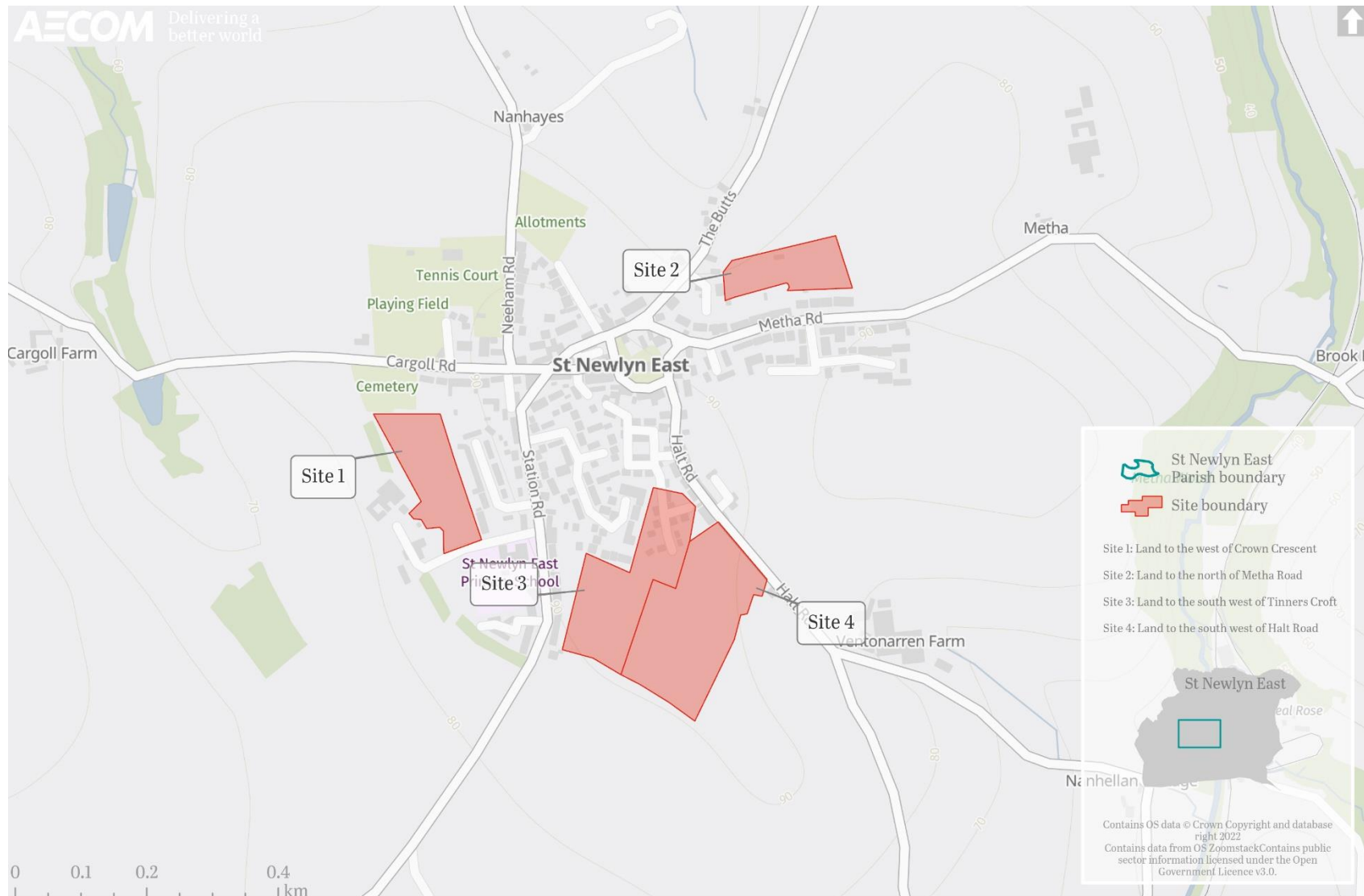
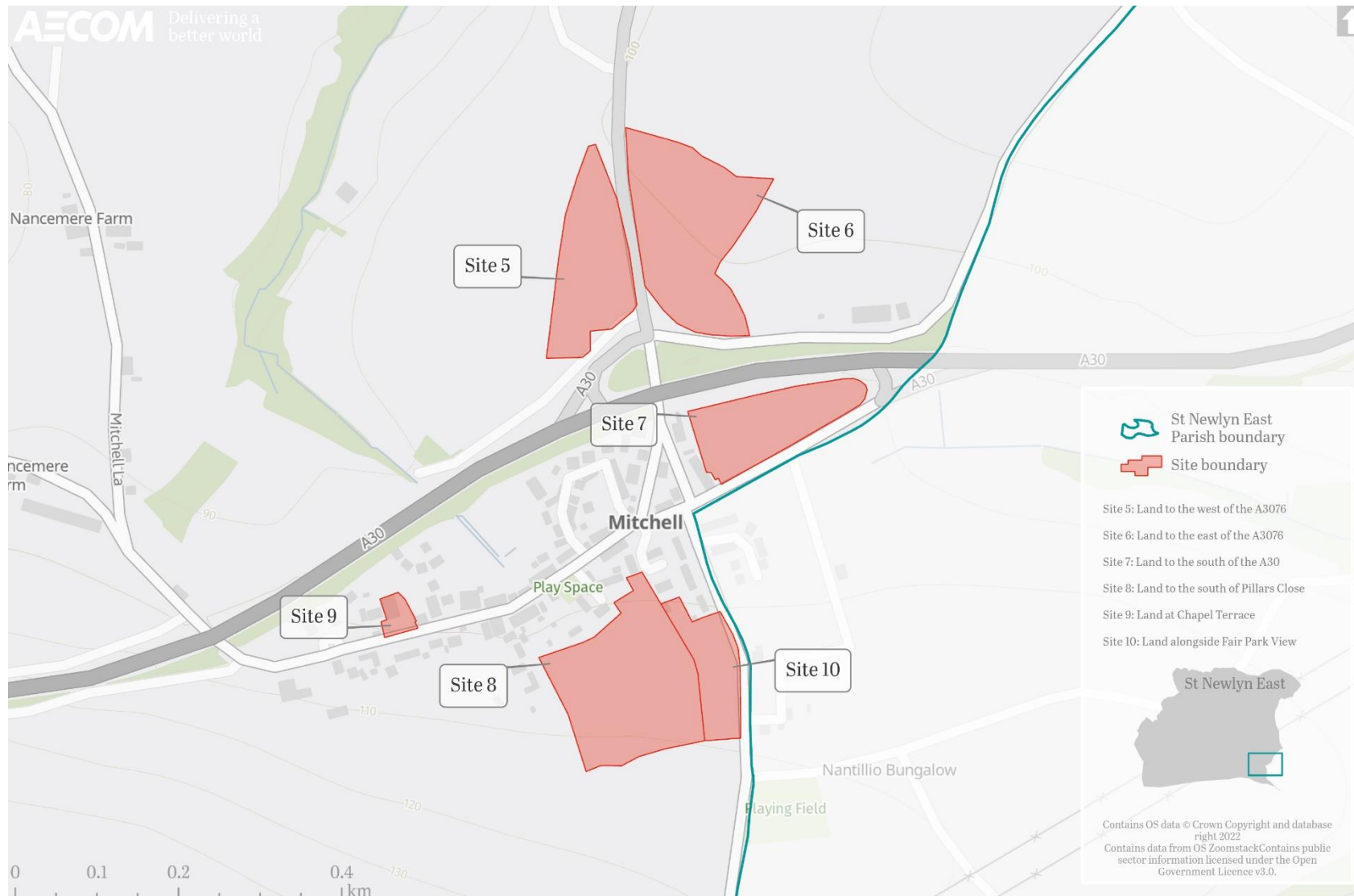


Figure 5.2 Sites assessed through the AECOM site assessment (Mitchell)





5.5 Since the AECOM SOA (2020), the Parish Council have further considered the sites. In a number of cases, the situation has evolved in terms of availability and suitability. The following is of note:

- Site 2 – is supported by the community for community use only, so is not considered as a reasonable alternative for housing
- Sites 5 and 6 – are allocated for employment use so not considered as reasonable alternatives for housing (The parish council seek to allocate all the potential employment sites they can (all that that came forward through the local CfS). There is support for the delivery of employment in Mitchell, away from housing with good access to road network).
- Site 7 – the parish council are buying this land from CC for use as a village hall, and is therefore not considered as reasonable alternatives for housing
- Site 9 – is a very small infill brownfield site – this site is the only infill brownfield site available and is strongly supported by the community as an opportunity to enhance the public realm in this part of Mitchell. As such the site will be considered a constant site across all reasonable alternatives.
- Site 3 – the northern field parcel has since been developed. As such, the southern boundary has been renegotiated and extended slightly. This now forms a hybrid between site 3 and site 4, capitalising upon the shared land ownership of these sites.

5.6 Table 5.1 sets out reasonable alternative spatial strategy options (sites and indicative number of homes) for assessment through the SEA. Option A is a low growth option, while Option B capitalises upon the shared land ownership of sites 3 and 4 to deliver economy of scale for enable the delivery of the sought after village link road. Option C considers growth in Mitchell.

5.7 Options A to C are also set out in Figures 5.3 to 5.5 overleaf.

**Table 5.1 Reasonable Alternative Spatial Strategy options**

<b>Site</b>	<b>Option A</b>	<b>Option B</b>	<b>Option C</b>
<b>1</b>	43		
<b>3 &amp; 4</b>		120	
<b>8</b>			63
<b>9</b>	5	5	5
<b>10</b>			21
<b>Total</b>	<b>48</b>	<b>130 – 140</b>	<b>89</b>

Figure 5.3 Option A

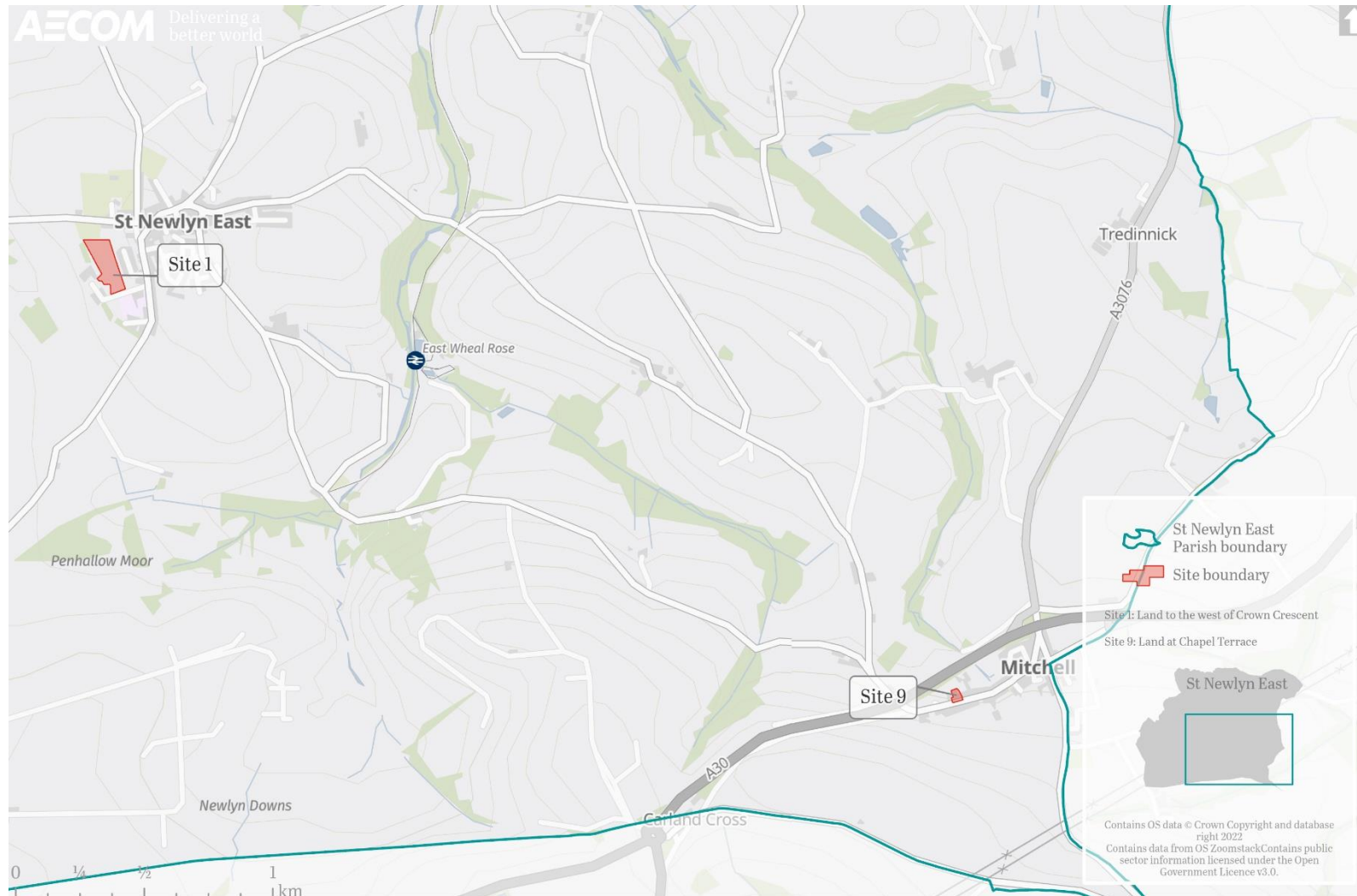


Figure 5.4 Option B

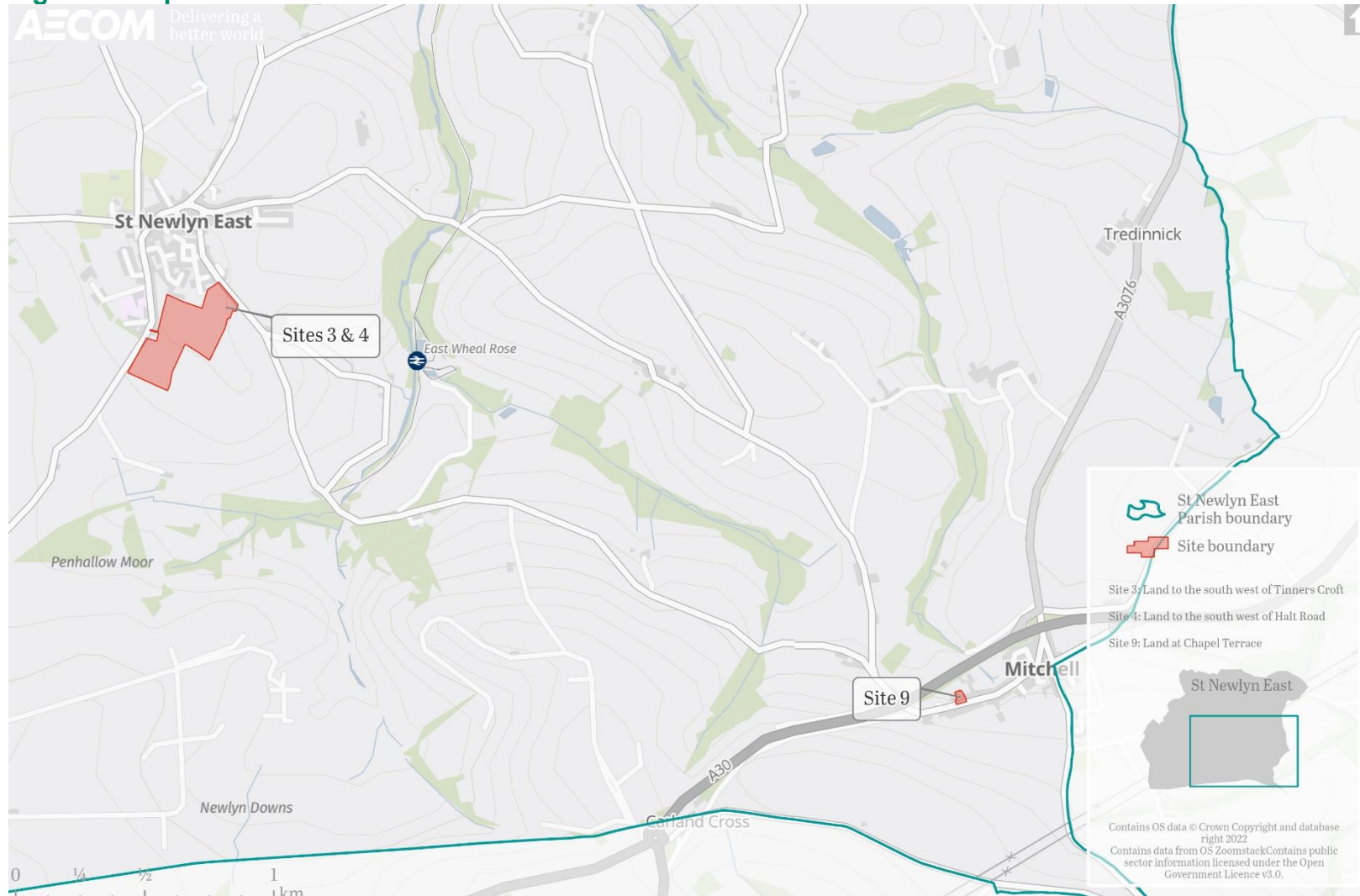


Figure 5.5 Option C



## 6. Assessing alternatives

### Methodology

- 6.1 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see Table 3.1) as a methodological framework. **Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Where appropriate neutral effects, or uncertainty will also be noted.
- 6.2 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.
- 6.3 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SEA perspective with "1" performing the best.
- 6.4 Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.<sup>5</sup> So, for example, account is taken of the duration, frequency and reversibility of effects.

### Assessment findings

- 6.5 Summary findings are presented in Table 6.1 overleaf, followed by a summary narrative. Detailed assessment findings are presented in Appendix C.

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<sup>5</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.



**Table 6.1 Summary findings – reasonable alternatives assessment**

SEA theme		Option A	Option B	Option C
		Site 1 and Site 9	Site 3/4 and Site 9	Site 8, Site 9 and Site 10
Biodiversity	Likely significant effect	No	No	No
	Rank	1	2	3
Climate change	Likely significant effect	No	Yes - positive	No
	Rank	2	1	3
Landscape	Likely significant effect	Yes - negative	Yes - negative	Yes - negative
	Rank	2	3	1
Historic environment	Likely significant effect	No	No	Yes - negative
	Rank	2	1	3
Land, soil and water resources	Likely significant effect	Yes – negative	Yes – negative	Yes - negative
	Rank	1	3	2
Community wellbeing	Likely significant effect	No	No	No
	Rank	2	1	3
Transport	Likely significant effect	No	Yes - positive	No
	Rank	2	1	2

**Summary commentary:**

The assessment has highlighted the potential effects as a result of development across the three options. All options have the potential to adversely impact on the Penhale Dunes SAC and the Fal and Helford SAC through impacts on water quality and resources, and air pollution. To support the development of the StNEM NP, a habitats regulations assessment (HRA), including an appropriate assessment (AA) has been undertaken. Impacts on the SACs from plan proposals have therefore been considered through the HRA/AA process, and recommendations made. Option B will require consultation with Natural England given site 3/4 overlaps with SSSI IRZs for the type of development likely to be brought forward, and Option C could result in biodiversity loss due to hedgerow removal to allow for access. It is also recognised that all options will be required to deliver a 10% biodiversity net gain, and that landscape-led masterplanning at sites could support improvements to the biodiversity in the long term.

In terms of the landscape, all options could result in changes to the baseline, specifically changes to the setting of protected landscapes. Options have the potential to impact upon the existing settlement pattern and character through greenfield development outside of the built up area, with Option B identified as the least favourably performing in this respect. This also reflects the sensitivities identified through the AECOM SOA (2022).

In terms of heritage, Option C has the potential to impact the Mitchell Conservation Area through sites 8 and 10. Option A is also constrained by designated assets with significance for the historic environment, and therefore Option B is best performing in relation to this SEA theme. It is recognised mitigation through sensitive design, landscaping and screening methods are likely to reduce residual effects to some extent.

All options will result in the loss of BMV greenfield land, with the potential for long term negative effects on soil resources. Options are ranked by area of landtake, with Option B therefore performing worst in this respect.

## 7. Establishing the preferred approach

- 7.1 St NEMNP Parish Council have set out the following reasons for selection and rejection of the three reasonable alternative spatial strategy options assessed through the SEA.
- 7.2 Throughout the plan-making process the community has indicated support for a strategy of controlled growth focussed on the village of St Newlyn East. The draft Neighbourhood Plan includes policies to enable sustainable development sufficient to realise the agreed aims and objectives for the Plan.
- 7.3 The SEA has made clear that the community's preferred growth strategy, Option B in the report, will have environmental impacts both positive and negative (see Table NTS.2). Notably, the strategy will have a likely significant negative effect on the 'Land, Soil, and Water resources' theme because of the loss of good quality agricultural land.
- 7.4 The SEA has considered the environmental impacts of the community's preferred strategy alongside those of two other "reasonable alternative spatial strategy options". The analysis shows that these too would similarly impact both positive and negative on the environment. The assessed impact of Option C indicates that the community's preference for growth focussed St Newlyn East is correct. It is also noted that an alternative growth strategy for St Newlyn East (Option A) based on alternative area of greenfield does not reduce the likely negative environmental impacts. Option A has already been rejected in favour of Option B, as a result of community consultation.
- 7.5 The conclusion reached from the SEA is that Option B remains a viable development option if the community is prepared to accept the loss of up to 6ha of greenfield land to provide more dwellings and grow the village population.
- 7.6 The consultation to be carried out as part of the next stage of plan-making will be used to seek confirmation from the community that this remains the case.

## **Part 2: what are the SEA findings at this stage?**



## 8. Introduction (to Part 2)

### Introduction

8.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current 'pre-submission' version of the StNEM NP. This chapter presents:

- An appraisal of the current version of the draft StNEM NP under the seven SEA theme headings; and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making.

### StNEM NP policies

8.2 The draft StNEM NP puts forward 29 policies to guide development in the Neighbourhood Plan area. These are set out in Table 8.1 below.

**Table 8.1 StNEM NP policies**

<b>Policy reference</b>	<b>Policy name</b>
NEM1	Protecting the Natural Environment
NEM2	Existing Woodlands, Trees and Hedges
NEM3	Agricultural Buildings
NEM4	Public Rights of Way
NEM5	Access to the Countryside
NEM6	Sustainable Tourism Development
NEM7	Local Heritage Assets
NEM8	St Newlyn East Village Centre
NEM9	Sensitive Design and Development
NEM10	Local Green Spaces
NEM11	Site Allocations
NEM12	Development on Unallocated Sites
NEM13	Housing Development
NEM14	Land off Halt Road, St Newlyn East
NEM15	Redevelopment of Land at Chapel Terrace, Mitchell
NEM16	Businesses Development
NEM17	Land rear of Metha Row, St Newlyn East
NEM18	Land off the A3076, Mitchell
NEM19	Home Working
NEM20	Communication Network
NEM21	Safe Walking and Cycling
NEM22	Pedestrian Safety in Village Centres

Policy reference	Policy name
NEM23	Off-Road Parking Provision
NEM24	Electric Vehicle Charging Points
NEM25	Existing Community Facilities
NEM26	New Community Facilities at Mitchell
NEM27	Community Energy Initiatives
NEM28	Recreation and Sports Facilities
NEM29	Children and Youth Facilities

## Methodology

- 8.3 The assessment identifies and evaluates ‘likely significant effects’ on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework.
- 8.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 8.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect ‘characteristics’ are described within the assessment as appropriate.

## 9. Appraisal of the draft StNEM NP

### Biodiversity

- 9.1 Special Areas of Conservation (SACs) are protected sites designated under the Habitats Directive. In this regard, the (115.4 ha) Newlyn Downs SAC falls partially in the south of the neighbourhood area. Outside of the neighbourhood area are other SAC's linked to development within the neighbourhood area through a known "pathway". These were considered through the Habitats Regulations Assessment (HRA) 'Screening' stage, and are discussed below.<sup>6</sup>
- 9.2 The HRA screened out all impact pathways with the exception of recreational pressure. However, recreational pressure was screened out for Newlyn Downs SAC and Bristol Channel Approaches SAC due to overarching work undertaken for Cornwall Local Plan. Specifically, Local Plan Policy 22 states all new residential, student and tourist accommodation will need to comply with a suite of monitoring and mitigation measures which are described within the SPDs for terrestrial, marine and estuarine sites.
- 9.3 The European designated sites considered within the Appropriate Assessment (AA) for impact pathways that could not be screened out at the screening stage (recreational pressure) were:
- Penhale Dunes SAC - at its closest point is 1.6km west of the Neighbourhood Plan area
  - Fal and Helford SAC - at its closest point 8km south of the Neighbourhood Plan Area
- 9.4 The Neighbourhood Area lies within the catchment of both Penhale Dunes SAC and Fal & Helford SAC. The AA recommended that a paragraph referencing Policy 22 of the Cornwall Local Plan is added to Policy No. NEM1. As an example, text could include "All development within St. Newlyn Parish must adhere to Policy 22 of the Cornwall Local Plan and provide SAMM contributions per dwelling with regards to mitigation recreational pressure on Penhale Dunes SAC and Fal & Helford SAC, in line with the European Sites Mitigation SPD (2021) or any subsequent document".
- 9.5 With this recommendation implemented the HRA concludes that the St. Newlyn East Neighbourhood Plan will not have an adverse effect on the integrity of any European sites in Cornwall, either alone or in combination with other plans and projects. The SEA supports this conclusion.
- 9.6 In terms of nationally designated sites, the neighbourhood plan area is constrained by Newlyn Downs SSSI (coinciding with Newlyn Downs SAC discussed above), and Carrick Heaths SSSI. Site allocation Land off Halt Road falls within an Impact Risk Zone (IRZ) for the Newlyn Downs SSSI, requiring engagement with Natural England given the site allocation exceeds the IRZ threshold of 100 residential homes.
- 9.7 The sensitive nature of the natural environment is reflected through several draft StNEM NP policies which seek to 1) help limit potential effects on

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<sup>6</sup> AECOM (2022) St Newlyn East Neighbourhood Plan HRA

designated features and areas of ecological interest and 2) support the resilience of local green infrastructure networks. This includes but is not limited to policy NEM1 – Protecting the Natural Environment, which states that “development proposals should have no significant adverse effect on the integrity or continuity of landscape features and habitats of importance for wild flora and fauna.” Furthermore, Policy NEM1 requires development to, where possible, “contribute to and enhance the natural environment by providing net gains in biodiversity.” This builds upon the mandatory requirement set through the Environment Act (2021) to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value.

- 9.8 There are also several locally important biodiversity sites within the neighbourhood area. County Wildlife Sites (CWS) represent some of the most significant areas of semi-natural habitat in Cornwall outside of statutory protected sites. In this regard, there are several CWS within the neighbourhood area such as small ponds, linear features, such as river valleys. Designated sites are provided protection under Policy NEM5 – Access to the Countryside which ensures the avoidance of recognised local ecological and geological features and habitats.
- 9.9 The nature, scale, timing, and duration of some development activities can result in the disturbance of protected species. This can include effects of poor air quality on designated sites, and severance of ecological networks from new development areas. In this respect, the StNEM NP seeks to ensure that proposed housing site allocations will support and enhance habitats, species, and ecological networks. Namely, Policy NEM14 – Land off Halt Road, St Newlyn East stipulates that tree-lined roads and pathways should be protected through development, which will help to minimise biodiversity impacts. This is further reinforced by the provisions of site-specific Policies NEM15, NEM18 and NEM19.
- 9.10 Assuming the recommendation set through the HRA AA is adopted, it is considered that **broadly neutral** effects are considered achievable. The StNEM NP policy framework seeks to help ensure that ecological sensitivities are appropriately considered during the planning, construction, and operational phases for new development proposals, and supported the delivery of biodiversity net gains in accordance with higher level policy provisions.

## Climate Change

- 9.11 Reflecting the conclusions of the UK Institute for Government’s ‘Net Zero’ report<sup>7</sup>, net zero is described as “decarbonising not just the power sector but much more difficult sectors including transport and housing, where progress has long been stalled and the UK is off track.” In this respect, policies within the StNEM NP support these principles by reducing the reliance on fossil fuels and supporting the introduction of low carbon solutions.
- 9.12 A key policy in this respect is Policy NEM24 – Electric Vehicle Charging Point, which requires development proposals to support the provision of electric vehicle charging outlets at suitable locations to serve public demand. This is

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<sup>7</sup> Institute for Government (2020): ‘Net zero: how government can meet its climate change target’ [online] available at: <https://www.gov.uk/government/publications/net-zero-strategy>

further reinforced by Policy NEM27 – Community Energy Initiatives, which encourages residents and local businesses to take every opportunity to make their property more energy efficient and to find ways to use renewable energy for their appliances and as their main energy source for heating and lighting.

- 9.13 Consideration is also given to the opportunities utilised at Land off Halt Road (Policy NEM14). The draft StNEM NP seeks to benefit from economy of scale at the site, enabling a link road to be delivered alongside the 120 homes proposed. This is anticipated to support numerous climate objectives, improving accessibility, modal shift, amenity access and improved air quality. The site also provides significant low carbon design opportunities that are committed to through the policy framework.
- 9.14 With reference to adapting to the effects of climate change, flood risk considerations for the proposed housing allocations are listed in the StNEM NP's site-specific Policies. Specifically, Policy NEM15 – Redevelopment of Land at Chapel Terrace, Mitchell and NEM14 – Land off Halt Road, St Newlyn East seek to incorporate adequate drainage provision, such as Sustainable Drainage Systems (SuDS).
- 9.15 Several of the StNEM NP's site-specific policies also encourage the use of permeable materials and sustainable methods through design. An overview is provided below:
- NEM17: provide a public electric vehicle charging facility
  - NEM15: the design is of high quality and incorporates sustainable construction techniques and energy conservation measures;
  - NEM14: use of sustainable construction techniques and energy conservation measures
- 9.16 It is recognised that the protection of open spaces and habitats within the neighbourhood area through Policy NEM2 and Policy NEM10 will safeguard natural carbon sequesters located within the landscape (i.e. trees and hedgerows). These policy provisions will positively respond to the potential effects of climate change (particularly from extreme weather events) through providing summer shading and shelter and reducing surface water run-off issues.
- 9.17 Overall, it is considered that the StNEM NP will potentially lead to **minor positive effects** through delivering strategic, sustainable growth that is supported by necessary infrastructure including the delivery of a link road to address local congestion and accessibility. Furthermore, the policy framework seeks to support proposals which deliver renewable energy generating infrastructure, and include low carbon energy sources to contribute towards addressing the global climate crisis. However, positive effects are dependent on the extent to which development proposals incorporate these mitigation and adaptation measures through design.

## Landscape and Townscape

- 9.18 Although the neighbourhood area does not sit within a protected landscape, it is within proximity to the Perranporth and Holywell Area of Great Landscape Value, which is located 2.5 km north west and is designated for its high landscape quality and distinctive characteristics. The St. Agnes Heritage Coast and part of the Cornwall and West Devon Mining Landscape World Heritage Site are located approximately 5 km south west of the neighbourhood area, both of which are significant in the landscape and should have their features respected and enhanced. While development in the neighbourhood area will need to be considerate of this landscape context, significant effects are very unlikely given topography and the scale of development proposed through the StNEM NP
- 9.19 Landscape and townscape character are key considerations when assessing the effect of new development on the landscape, particularly in visual and amenity terms. The relationship between the neighbourhood area, the Newlyn Downs Landscape Character Area (LCA), the Newquay and Perranporth Coast LCA, for example, is a defining feature and contributes strongly to the Neighbourhood Plan area's sense of place and quality of its environment. Further, Cornish hedges are Cornwall's premier landscape character feature and prevail throughout the neighbourhood area.
- 9.20 Recognising the sensitivity of these relationships, proposals within the StNEM NP have a strong focus on protecting the sense of place and special qualities which contribute the character of the neighbourhood area, particularly in the context of special landscapes discussed above. For example, Policy NEM1 – Protecting the Natural Environment ensures that proposals should have no significant adverse effect on the integrity or continuity of landscape features.
- 9.21 Further contributing to the quality of the natural and built environment, is Policy NEM4 which stipulates that Public Rights of Way Public (PRoWs) should be protected from development. This policy is generally supportive of improvements and enhancements to the network and is strengthened by Policy NEM5 – Access to the Countryside, and NEM9 – Sensitive Design and Development.
- 9.22 In terms of the site allocations, noteworthy in relation to the landscape theme is the delivery of 120 homes at greenfield site Land off Halt Road. The site is located adjacent to the built up area and settlement boundary of St Newlyn East, with the potential to impact landscape character and long distance views, in addition to views into the site from a nearby public right of way and properties to the north, north west and west. Given its position on Halt Road, and in light of its size (120 dwellings), development could change the visual approach of the village from the south east.
- 9.23 Policy NEM14 (Land off Halt Road) therefore sets specific requirements for development at this site, including the provision of landscaping, including tree-lined roads and pathways, to minimise any visual impact on the setting of the village and local landscape character such as Cornish Hedges. This will be particularly important during the construction of the link road, which will undoubtedly lead to negative effects on the landscape during construction, with the potential for minor negative effects during operation.

- 9.24 Nonetheless, it is considered that the strategic nature of the site will allow for landscape-led masterplanning that ensures good quality design and layout of buildings and spaces. Furthermore, the link road is considered to remove congestion and bottlenecking through the village, which may offset any temporary negative effects on the local landscape. This has the potential to lead to positive effects in the long term, improving the local villagescape character and protecting the special qualities of the StNEM NP area .
- 9.25 In accordance with Policy NEM11 (Site Allocations), development proposals on allocated sites must conform to other policies in the Neighbourhood Plan. This includes Policy NEM9 (Sensitive Design and Development), which requires development respect the character of its setting and have regard to the prevailing scale, massing, and density in the locality. It is noted that there is the potential for significant positive effects in this respect through the redevelopment of Land at Chapel Terrace. This is a small site located within the existing built up area, and will likely support improvements to the settlement character and local villagescape.
- 9.26 In terms of employment sites, it is recognised that Land off the A3076 and Land Rear of Metha Row are fairly open in character. Land off the A3076 is however separate from the existing village of Mitchell, located to the north of the A30. Land rear of Metha Row abuts existing housing within Mitchell, with direct views into the site from properties along Metha Road. The site is therefore only supported for the development of creative workshop spaces for micro-businesses, and a public car park, endorsed by the local community. Furthermore, provisions set out through site allocation policies (NEM15, NEM17 and NEM18) seek to, alongside those policies discussed above, ensure that proposals reflect the sense of place and local distinctiveness at key locations in the town.
- 9.27 Overall, the StNEM NP policies have a strong focus on protecting and enhancing landscape and townscape character, the quality of the public realm, sense of place, and local distinctiveness. Nonetheless, the delivery of 120 homes on greenfield site Land off Halt Road, alongside the delivery of a link road, is considered likely to lead to **minor negative effects** on the landscape. Effects are unlikely to be significant when considered alongside policy provisions set out through the draft NP, in addition to the provision of Local Plan and national planning policy.

## Historic Environment

- 9.28 The neighbourhood area has a rich historic environment, recognised through the diversity of features and areas that are nationally and locally designated for their heritage interest and two conservation areas. In addition, the Cornwall and West Devon Mining Landscape World Heritage Site (WHS) is located 5km to the west of the neighbourhood area. However, given the distance of the WHS and the level of growth proposed, it is not considered that the draft StNEM NP will impact upon the WHS.
- 9.29 The spatial strategy of the StNEM NP directs most growth around the main settlement areas (namely, St Newlyn Village and Mitchell), reducing the potential for negative effects of significance in relation to the mining heritage and WHS in the west of the settlement area (approx. 7.5km from site



allocations). There are 55 buildings and other structures within Mitchell that are 'listed' by Historic England; and 76 within St Newlyn East, including four that are grade I and two grade II\* listed.

- 9.30 Reflecting the sensitivity of the neighbourhood area, StNEM NP policies and proposals focus on the conservation and enhancement of both designated and non-designated heritage assets, and their settings. Namely, Policy NEM9 emphasises that replacement of any building will only be supported if the proposed development makes a positive architectural contribution to its setting.
- 9.31 In conjunction with Policy 24 of the Local Plan, Policy NEM7 is intended to ensure that the full range of local heritage assets throughout the Parish are recognised and provided with protection from inappropriate development, to ensure the character and visual amenity of the area is not harmed.
- 9.32 In terms of the large housing site allocation, Land off Halt Road is not constrained by designated heritage assets. Policy NEM14 (Land off Halt Road) does however require that development proposals minimise any visual impact on the setting of the village. Proposals will be required to ensure sensitive, high quality design that reflects the heritage value of the village, in accordance with Policy NEM11 and Policy NEM9. Of particular relevance in this respect is the provision of a link road through policy NEM14 alongside new housing. The link road seeks to remove traffic from the village centre, which will enhance the setting of the historic villagescape character, the conservation area and the fabric and setting of designated and non designated features of historic significance. This has the potential to lead to positive effects in the long term, improving the local villagescape character and protecting the special historic qualities of the StNEM NP area.
- 9.33 Employment site allocations Land rear of Metha Row and Land off the A3076, Mitchell, are located within relatively sensitive locations in relation to the St Newlyn East Conservation Area. Land Rear of Metha Row is in the setting of the Conservation Area to the north east, while Land off the A3076 is located to the south, with significant road infrastructure (A30 junction/ trunk road) reducing the sensitivity of this specific location. Nonetheless, both Policy NEM17 (Land rear of Metha Row) and Policy NEM18 (Land off the A3076) subsequently require that development proposals "do not detract significantly from the setting of the Conservation Area, listed buildings, and local heritage assets".
- 9.34 Site allocation Land at Chapel Terrace is also constrained, with the site's eastern and southern boundaries located adjacent to the Mitchell Conservation Area. However it is noted that current uses on the site are considered detrimental to the setting of the Conservation Area. Policy NEM15 (Redevelopment of Land at Chapel Terrace, Mitchell) is therefore anticipated to lead to positive effects on the historic environment through regeneration of the site. The policy seeks to provide a high-quality residential development that delivers enhancements to the setting of the historic environment and deliver homes in an accessible location. Sensitive and appropriate site design at both sites will be required to align with guidance found in the Cornwall Design Guide, 2021, and Policy NEM9 (Sensitive Design and Development). Policy NEM9 is in place to ensure proposals in the plan area are supported by suitability and quality of design which will minimise impacts on the setting and key views within the conservation areas.



9.35 Considering the above, there remains a potential for **residual negative effects** on heritage assets including to the integrity of key views into the conservation area. However, effects are **not likely to be significant**, and have the potential to be **positive** where sites are being redeveloped with the potential to improve the existing character of locations. It is further recognised that at Land at Halt Road is an area of low sensitivity, and that strategic growth at this location will be supported by appropriate policy including Policy NEM7 and NEM18, supporting high quality design and layout.

## Land, Soil, and Water Resources

9.36 The mining heritage in the vicinity of the neighbourhood area reflect success of early, large-scale, industrialised non-ferrous hard-rock mining. The StNEM NP has a strong focus on encouraging development at vacant and under-utilised sites within the village (see Policy, NEM3, NEM9 and most notably, NEM12: Development on Unallocated Sites) as well as unlocking potential opportunity areas (see Policy NEM10 and NEM26 - NEM29). Furthermore, Policy NEM11 emphasises that priority development should be targeted towards brownfield sites within the existing settlement areas. Making use of regeneration and brownfield development opportunities will lead to positive effects in terms of protecting the neighbourhood area's land/ soil resource through supporting the efficient use of land.

9.37 Loss of greenfield land is however anticipated through the allocation of Land off Halt Road, Land at the rear of Metha Road, and Land off the A3076. Additionally, it is recognised that Land off Halt Road and Land at the rear of Metha Road are underlain by high quality agricultural land. It is uncertain whether Land off the A3076 is underlain by high quality agricultural land, Natural England's provisional mapping identifies that the site is underlain by Grade 3 agricultural land which has a >60% chance of containing BMV land. Overall it is considered that the loss of greenfield and high quality agricultural land is anticipated to lead to permanent negative effects against this SEA theme.

9.38 Concerning the protection of water resources, Policy NEM14 and NEM15 seeks to ensure the provision of adequate drainage, promoting the use of Sustainable Drainage Systems (SuDS) and Policy NEM17 affirms appropriate surfacing, and drainage designed to safeguard local residential amenity.

9.39 Overall it is considered that the draft StNEM NP policy framework performs positively through promoting the regeneration of brownfield development within the neighbourhood area. However given the loss of approximately 6ha of greenfield and BMV agricultural land, **significant negative effects** are concluded.

## Community wellbeing

9.40 Through consultation, residents of St Newlyn East and Mitchell identified several green and open areas they valued, including War Memorial, St Newlyn Churchyard and Mitchell play area. Growth within the settlements is considered to be of low risk to impacting these important spaces, as Policy NEM10 seeks to prevent development that would harm the open character of Green Spaces and maintain or enhance the existing use and amenity value of these sites. This policy also stipulates that any green space lost to development should be

replaced by alternative green space that will benefit the community and the area.

- 9.41 The quality of development is a key influence on the quality of life of residents. In this respect, several policies provide criteria and guidance for development proposals, with a view to implementing high quality design and layout within new development areas. Policy provisions primarily focus on ensuring that appropriate mitigation measures are incorporated to address any potential constraints to development, in addition to ensuring that new development is safe, attractive, inclusive, and accessible, and in keeping with the surrounding environment. Key policies in this regard include Policy NEM14 and NEM15, in addition to Policies NEM16 - NEM18, which support the provision of more local employment opportunities in suitable locations near Mitchell. Since these locations in Mitchell are well connected by road - namely its strategic location along the A30, Mitchell presents an opportunity for business development which can enhance the local economy.
- 9.42 A key focus of the StNEM NP policy framework is to support and enhance residents' quality of life. Specifically, Policy NEM13 and NEM27 promote the delivery of energy efficient and low carbon developments. This will help to address issues such as fuel poverty, which is important in the current economic climate given the rising costs of living. The StNEM NP seeks to facilitate the delivery of high quality and inclusive homes and neighbourhoods with the potential to promote the physical and mental health and wellbeing of residents. Namely, Policy NEM28 states that an outdoor area for recreation at Mitchell will be particularly supported; further reinforced by NEM29 – Children and Youth Facilities. Positive effects are therefore predicted against this SEA theme.
- 9.43 To further support community wellbeing, measures to help increase sustainability, connectivity, accessibility and reduce the need to travel are included throughout the StNEM NP policy framework, such as Policies NEM21- NEM23. These policies primarily focus on active travel uptake and seek to encourage opportunities for walking and cycling (i.e. healthier modes of transport). It is recognised that a key aim of the StNEM NP is to deliver link road (alongside housing development proposed within Policy NEM14), which is supported locally to address congestion and accessibility in and around the neighbourhood area. This is discussed further under the 'Transportation' SEA theme, below.
- 9.44 Overall, the draft StNEM NP policy framework seeks to ensure that community facilities and infrastructure continues to reflect the needs of a changing and increasingly diverse population, and that these facilities are accessible to all. The delivery of a link road, improved access to green space, and delivery of affordable homes to meet local needs will notably lead to **significant long term positive** effects in relation to this SEA theme.

## Transportation

- 9.45 In terms of the strategic transport network, the A30 is the main road connecting the neighbourhood area to larger settlements to the west and east and is the main trunk road through Cornwall. The A30 traverses just part of the neighbourhood area (across the southeast corner) but it has a disproportionate

impact on the local transport network. Mitchell is relatively well connected with its strategic location along the A30.

- 9.46 Policies and proposals within the StNEM NP seek to maximise the ability for residents to travel by public, sustainable, and active modes of transport. Key policies in this regard include, NEM21 which ensures the provision of safe walking and cycling routes; NEM22, which supports proposals that increase the level of provision and/or improve the functionality of off-street parking to serve the village centres; and Policy NEM23, which addresses congestion associated with parking issues. This is reinforced by Policy NEM4 – Public Rights of Way and Policy NEM5, which is supportive of the development of footpaths and/or cycle routes in the countryside.
- 9.47 In addition, Policies NEM16 - NEM18 support the provision of more local employment opportunities in suitable locations near Mitchell. “This seeks to utilise the locations’ excellent access to the strategic road network via the A30. . In this regard, alongside 120 new homes, Policy NEM14 indorses the provision of a link road linking Halt Road and Station Road. The link road is supported locally, and it is hoped that it will substantially reduce the traffic that traverses the centre of the village of St Newlyn East.
- 9.48 The impact of the Covid-19 pandemic means that the future baseline of travel demand is likely to be different for all residents. In the longer term it is hard to predict how behaviours will evolve and whether some of the travel responses observed during the national lockdowns will be maintained in some form. These changes in travel patterns are reflected by Policy NEM19, which supports flexible working practices and Policy NEM20, which promotes the development of communication infrastructure within the parish.
- 9.49 The neighbourhood area is relatively rural, and there is likely to be a continuation of reliance on the private vehicle for travel. As such, the policies within the StNEM NP support more active travel infrastructure, such as the provision of a link road under NEM14 to improve connectivity in and around the neighbourhood area. This will also improve the pedestrian experience within town and local centre destinations, supporting the principle of low-traffic neighbourhoods, and providing a more reliable and resilient public transport network. Considering these points, **significant long-term positive effects** are anticipated.

## Conclusions and recommendations

### Conclusions

- 9.50 The assessment has concluded that the Regulation 14 version of the Neighbourhood Plan is likely to lead to **significant positive effects** in relation to the ‘Community Wellbeing’ SEA theme. This reflects the focus of the StNEM NP on delivering housing, including affordable housing, to meet local needs; and safeguarding and enhancing local infrastructure, including the provision of a link road to support accessible, connected neighbourhoods. The plan also performs positively through allocating land for employment and regeneration, supporting business development to enhance the local economy.
- 9.51 The Neighbourhood Plan is also likely to lead to **significant positive effects** in relation to the ‘Transportation’ SEA theme. These benefits largely relate to the

StNEM NP's emphasis on enhancing more active travel infrastructure, and the delivery of a link road which will substantially reduce the traffic that traverses the centre of the village of St Newlyn East. Focus is placed on improving the pedestrian experience within the town and local centre destinations with the potential for long term positive effects. This includes supporting a modal shift towards sustainable transport and providing a more reliable and resilient public transport network.

- 9.52 Regarding the 'Climate Change' SEA theme, the StNEM NP will potentially lead to **minor positive effects** through delivering strategic, sustainable growth that is supported by necessary infrastructure. Notably this includes the delivery of a link road which will enhance the conditions for walking and cycling, which are lower carbon modes of transport. Furthermore, the policy framework seeks to support proposals which deliver renewable energy generating infrastructure, and include low carbon energy sources to contribute towards addressing the global climate crisis. However, positive effects are dependent on the extent to which development proposals incorporate these mitigation and adaptation measures through design.
- 9.53 It is considered that the draft StNEM NP will bring **broadly neutral effects** in relation to the 'Biodiversity' SEA theme. The policy framework seeks to protect and enhance ecological networks, and deliver net gains in accordance with national policy.
- 9.54 Considering the 'Historic Environment' SEA theme, there remains a potential for **residual negative effects** on key views and heritage assets, however these are **not likely to be significant**, with most growth directed to an area of less sensitivity and being supported by appropriate policy requirements. This includes ensuring suitability and quality of design – which will likely minimise impacts on the setting of key views within the conservation areas. The delivery of a link road alongside new housing could lead to **long term positive effects** on the historic environment through removing traffic from the village centre. This would likely enhance the setting of the historic villagescape character, the conservation area and the fabric and setting of designated and non designated features of historic significance.
- 9.55 Greenfield expansion at land off Halt Road is considered likely to lead to **residual negative effects** in relation to the 'Landscape' SEA theme. These will **not be significant** in nature, as the StNEM NP places an emphasis on protecting and enhancing the special qualities of the parish, supporting the quality of the public realm, and incorporating high-quality and sensitive design through development proposals. Furthermore, it is considered that the delivery of a link road alongside new housing will remove congestion and bottlenecks through the village, which may offset any temporary negative effects on the local landscape. This has the potential to lead to **positive effects in the long term**, improving the local villagescape character and protecting the special qualities of the StNEM NP area .
- 9.56 The Neighbourhood Plan will initiate several beneficial approaches for the 'Land, Soil and Water Resources' SEA theme through the implementation and application of SuDS, and supporting for redevelopment of brownfield sites and/or re-use of existing buildings. However, given the loss of approximately 6ha of greenfield and BMV agricultural land, **significant negative effects** are anticipated.

## Recommendations

- 9.57 The SEA supports the recommendations set out in the HRA AA (2022). The AA recommended that a paragraph referencing Policy 22 of the Cornwall Local Plan is added to Policy No. NEM1. As an example, text could include “All development within St. Newlyn Parish must adhere to Policy 22 of the Cornwall Local Plan and provide SMM contributions per dwelling with regards to mitigation recreational pressure on Penhale Dunes SAC and Fal & Helford SAC, in line with the European Sites Mitigation SPD (2021) or any subsequent document”.
- 9.58 With this recommendation implemented the HRA concludes that the St. Newlyn East Neighbourhood Plan will not have an adverse effect on the integrity of any European sites in Cornwall, either alone or in combination with other plans and projects.

## **Part 3: What are the next steps?**

## 10. Next steps and monitoring

10.1 This part of the report explains the next steps that will be taken as part of plan-making and SEA.

### Plan finalisation

10.2 Following consultation, any representations made will be considered by the Parish Council, and the draft StNEM NP and Environmental Report will be updated as necessary. The Environmental Report will then accompany the StNEM NP for submission to the Local Planning Authority, Cornwall Council, for subsequent Independent Examination.

10.3 At Independent Examination, the StNEM NP will be considered in terms of whether it meets the basic conditions for neighbourhood plans and is in general conformity with local planning policy.

10.4 If the Independent Examination is favourable, the StNEM NP will be subject to a referendum, organised by Cornwall Council. If more than 50% of those who vote agree with the StNEM NP, then it will be 'made'. Once made, the StNEM NP will become part of the development plan for the neighbourhood area.

### Monitoring

10.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

10.6 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Cornwall Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the StNEM NP that would warrant more stringent monitoring over and above that already undertaken by Cornwall Council.

# Appendix A Regulatory requirements

As discussed in Chapter 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. Table AA.1 overleaf links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table AA.2 explains this interpretation. Table AA.3 identifies how and where within the Environmental Report the regulatory requirements have / will be met.



**Table AA.1: Questions answered by this Environmental Report, in line with an interpretation of regulatory requirements**

		Questions answered	As per regulations... the Environmental Report must include...
<b>Introduction</b>	What's the plan seeking to achieve?		<ul style="list-style-type: none"> <li>• An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What's the SEA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>• Relevant environmental protection objectives, established at international or national level</li> <li>• Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>• Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>• The environmental characteristics of areas likely to be significantly affected</li> <li>• Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> <li>• Key environmental problems / issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment</li> </ul>
<b>Part 1</b>	What has plan-making / SEA involved up to this point?		<ul style="list-style-type: none"> <li>• Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>• The likely significant effects associated with alternatives</li> <li>• Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>
<b>Part 2</b>	What are the SEA findings at this current stage?		<ul style="list-style-type: none"> <li>• The likely significant effects associated with the draft plan</li> <li>• The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</li> </ul>
<b>Part 3</b>	What happens next?		<ul style="list-style-type: none"> <li>• A description of the monitoring measures envisaged</li> </ul>

**Table AA.2: Questions answered by this Environmental Report, in line with regulatory requirements**

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	The environmental characteristics of areas likely to be significantly affected	i.e. answer - <i>What are the key issues &amp; objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	
	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The likely significant effects associated with the draft plan	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]
	A description of the measures envisaged concerning monitoring	

i.e. answer - What's the scope of the SA?

**Table AA.3: 'Checklist' of how (throughout the SEA process) and where (within this report) regulatory requirements have been, are and will be met.**

Regulatory requirement	Discussion of how requirement is met
<b>Schedule 2 of the regulations lists the information to be provided within the SEA Report</b>	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 ('What is the plan seeking to achieve') presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The 'SEA framework' – the outcome of scoping – is presented within Chapter 3 ('What is the scope of the SEA?').
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The SEA framework is presented within Chapter 3 ('What is the scope of the SEA'). Also, the SEA Scoping Report presents key messages from the context review.  With regards to explaining " <i>how...considerations have been taken into account</i> ", Chapter 7 explains the Steering Group's 'reasons for supporting the preferred approach', i.e., explains how/ why the preferred approach is justified considering the alternatives appraisal.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives appraisal findings (in relation to housing growth, which is a 'stand-out' plan policy area).  Chapters 9 presents an appraisal of the plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g., timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions between competing objectives, which might potentially be actioned by the Examiner, when finalising the plan. Also, specific recommendations are made in Chapter 10.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on issues and options.  Also, Chapter 7 explains the Parish Council's 'reasons for selecting the preferred option' (considering the alternatives appraisal).

### Regulatory requirement

### Discussion of how requirement is met

9. Description of measures envisaged concerning monitoring in accordance with Art. 10;

Chapter 11 presents measures envisaged concerning monitoring.

10. A non-technical summary of the information provided under the above headings

The NTS is provided at the beginning of this Environmental Report.

### The SEA Report must be published alongside the Draft Plan, in accordance with the following regulations

authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)

At the current time, this Environmental Report is published alongside the 'pre-submission' version of the Peasmarsh Neighbourhood Plan, with a view to informing Regulation 14 consultation.

### The SEA must be taken into account, alongside consultation responses, when finalising the plan.

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

Appraisal findings presented within this Environmental Report, and consultation responses received, have been fed back to the Steering Group and have informed plan finalisation.

# Appendix B Scoping information

## Introduction

This appendix presents additional information on the SEA scope, namely key issues under each of the SEA framework headings. As set out in the Scoping Report, these key issues were identified following a review of the context and baseline.

Additionally, this appendix presents a summary of responses received as part of the scoping consultation, followed by the SEA Framework.

## Air quality

- While air quality is not a significant constraint in the neighbourhood area, increased congestion and reduced air quality have the potential to negatively affect the health of residents. Such effects will be explored under the 'community wellbeing' SEA theme (Chapter 8).
- The nearest AQMA is 7.5km from the neighbourhood area. This is considered far enough away that development coming through the St Newlyn East & Mitchell Neighbourhood Plan will not have a substantial effect.
- Local congestion is seen on the A30 which extends through the southeast corner of the parish. The effects of the StNEM NP in relation to traffic and congestion will be explored under the 'transportation' SEA theme.
- The StNEM NP also presents opportunities to enhance accessibility and support more local and sustainable journeys / connections around the neighbourhood area. These opportunities will also be explored the 'transportation' theme.
- Considering the above, within the neighbourhood area there is an absence of any significant air quality issues (i.e., AQMAs) and there are no exceeded or expected exceedances of national air quality objectives. **Therefore, the air quality theme has been scoped out for the purposes of the SEA process.**

## Biodiversity

- Since the neighbourhood area falls partially within Newlyn Downs SAC, any new residential development will be required to mitigate the effects of the development and show how this will be achieved prior to approval of planning permission. As such consultation with Natural England is likely to be required. Consideration should be paid to the Site Improvement Plan for the Newlyn Downs SAC. The neighbourhood area also falls within the ZOI of the Penhale Dunes SAC.
- In terms of nationally designated biodiversity sites, there are two SSSI's in proximity to the neighbourhood area. Increased recreational access to these areas as a potential result from Neighbourhood Plan proposals, without mitigation, could result in the significant features of the sites being degraded or lost. In turn, these nationally important areas could lose their birds and habitat, (and therefore their designations).
- There is one prominent area of Ancient Woodland and several CWS within the neighbourhood area which host a variety of plant and animal species that

contribute to biodiversity and support ecological connectivity. These areas should be retained and enhanced through development.

## Climate change

- Cornwall has seen a 36.3% reduction in the percentage of total emissions per capita between 2005 and 2016, slightly lower than the reductions for the southwest of England (36.7%) and England (37.6%).
- The transport sector is the largest contributor to emissions in Cornwall, and continues to be a key challenge locally, reflecting the rural nature of the neighbourhood area. There is a distinct lack of charging stations locally, with one rapid charging station within the neighbourhood area at Carland Cross. Charging stations are absent to the northeast and southwest of the neighbourhood area, potentially discouraging sustainable transport methods in both directions.
- Opportunities to influence per capita emissions could be sought the St Newlyn East & Mitchell Neighbourhood Plan process, particularly by planning for integrated and connected development, which reduces the need to travel and supports opportunities to travel by more sustainable modes.
- The neighbourhood area is partially affected by areas fluvial and surface water flood risk, notably along the Lappa Valley. It is vital that major development proposals within the St Newlyn East & Mitchell Neighbourhood Plan should not only provide a long-term water management plan, but also demonstrate that adequate contractual and funding arrangements are in place to ensure the continuity of the plan over the lifetime of the development.
- Opportunities to enhance the resilience of the both the neighbourhood area and its residents, to the effects of climate change should be sought. This can include adaptation strategies, green infrastructure enhancement, flood betterment measures, infrastructure development, and increased renewable energy sources.

## Landscape

- The St Newlyn East & Mitchell Neighbourhood Plan should seek to maintain the integrity and setting of the West Devon Mining Landscape WHS. The Management Plan for the site which outlines the key management issues and resulting policies and strategic actions should be considered.
- The neighbourhood area falls within two distinct LCA's as set out in the Cornwall and Isles of Scilly Landscape Character Assessment<sup>8</sup>. These unique nature of both LCAs should be conserved and enhanced through new development within the St Newlyn East & Mitchell Neighbourhood Plan.
- Moreover, Cornish hedges should form a key element within the design of any new development's green infrastructure network. The space required to achieve a well-designed green infrastructure network which sustainably retains Cornish hedges (amongst other landscape features), should be factored into calculations to determine available built areas / density of the development. The Biodiversity Guide describes acceptable scenarios within plans which involve consideration

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<sup>8</sup> Cornwall Council (2020) Cornwall and Isles of Scilly Landscape Character Assessment Available at: <https://www.cornwall.gov.uk/planning-and-building-control/neighbourhood-planning/preparing-a-neighbourhood-plan/local-landscape-character-assessment/>



of buffer zones, retaining connectivity, enhancement measures, light shielding and overall management.<sup>9</sup>

## Historic environment

- There are 55 buildings and other structures at Mitchell that are 'listed' by Historic England; and 76 at St Newlyn East, including four that are grade I and two grade II\*. There are two conservation areas within the neighbourhood area, one in St Newlyn East and one in Mitchell. Conservation appraisals do not currently exist for either of the conservation areas in the neighbourhood area, which may present a gap in local policy. As such, the Neighbourhood Plan presents an opportunity to further enhance our understanding on the special qualities of these areas (including potentially through compiling a local heritage list).
- In addition the neighbourhood area exhibits several scheduled monuments, one of which – Warren's Barrow Scheduled Monument – is known to be 'at risk' according to Historic England's risk register. As such, extra provisions should be provided for this asset through the St Newlyn East & Mitchell Neighbourhood Plan.
- The town is also rich in non-designated assets with the Cornwall and Isles of Scilly Historic Environment Record (HER) recognising 161 heritage assets which lie either wholly or partially within the neighbourhood area.

## Land, soil and water resources

- A proportion of the neighbourhood area is underlain by land classified as best and most versatile (BMV) agricultural land, including areas of Grade 2 land, which is regarded as being very good quality agricultural land. As such new development should seek to avoid loss of this resource wherever possible.
- The neighbourhood area (namely around the village of Mitchell in the southeast) overlaps with an NVZ, however it is unlikely that the St Newlyn East & Mitchell Neighbourhood Plan will have an impact on the designation. Sections of the neighbourhood area also intersect sites of previous mining activity (refer to **Figure 7.3**) the integrity of which should be considered throughout the St Newlyn East & Mitchell Neighbourhood Plan.
- The most recently completed water quality assessments undertaken in 2019 classifies the water bodies north and south of the neighbourhood area as having a 'moderate' ecological status however the River Benny Water Body exhibited a 'fail' chemical status in 2019. New development within the neighbourhood area should be sympathetic to the quality of the Benny Water and seek to prevent wastewater discharges, water run-off, and diffuse pollution.

## Community wellbeing

- In 2019, the LSOA in the east of the neighbourhood area was ranked 10,154 out of 32,844 LSOAs in England; where 1 is the most deprived LSOA. This is amongst the most deprived neighbourhoods in the country.
- The overall quantity of employment available in the neighbourhood area has declined considerably in recent years. There is however a good range of community facilities in the neighbourhood area including provision of equipped

<sup>9</sup> Cornwall Council (2020) Biodiversity Guide Available at: <https://www.cornwall.gov.uk/media/v1roqk0x/biodiversity-guide.pdf>.

space for teenagers and a very high level of allotment space which can help reduce barriers to accessing services and improve the living environment.

- A large proportion of the population within the neighbourhood area are over 65 age band. This suggests there is an ageing population within the neighbourhood area and a subsequent need to plan for more adaptable homes, specialist homes, etc. Furthermore, an ageing population can place extra and different demands on local health, education, transport and potentially housing.
- The neighbourhood area also exhibits a higher proportion of 0-15 age bracket compared to the other measured geographies (Cornwall, southwest England and England as a whole). If this trend increased over the long term, the capacity of the village's primary school could be challenged.

## Transportation

- It is recognised that trends favour cars/ vans as the primary mode of transport and low levels of public transport use. As such, planning should seek to maximise opportunities to reduce the need to travel, enable home working, and access a choice of sustainable transport modes where possible including active travel opportunities.
- New development has high potential to increase traffic and lead to additional localised congestion and parking issues which in turn may reduce road safety. A key concern in this respect is narrow streets which are already heavily trafficked, and the exacerbation of existing peak time congestion.
- The lack of safe pedestrian, or cycling, routes within the village, and between smaller villages in the neighbourhood area and St Newlyn East village centre, results in movement around the village, often being hazardous and unpleasant. The community has voiced this concern about road safety for pedestrians in the built-up areas.
- As such the St Newlyn East & Mitchell Neighbourhood Plan should seek to support small-scale infrastructure improvements and active travel opportunities that seeks to maximise opportunities for pedestrian and cyclist movements, such as the Action Plan's 'Designated Funds Cycle Routes'



## Scoping consultation responses

**Table AB.1: SEA scoping consultation responses**

Consultee	Consultation response summary	AECOM response
<b>Environment Agency</b>	<p>Please note that due to resource pressures we have had to limit our bespoke input to Neighbourhood Plan work outside of our local focus areas and/or where the plan proposes allocations/policies within areas at risk of flooding. The St Newlyn East &amp; Mitchell parish is not presently within such a focus area and therefore we will not be providing any bespoke advice in respect of this consultation.</p> <p>However, it remains important that parish councils and neighbourhood forums are provided with the best available evidence to shape the future of the places in which people live and work. We therefore attach the guide 'Neighbourhood Planning for the environment' which has been prepared jointly by Environment Agency, Natural England, Forestry Commission and Historic England. This environmental toolkit focusses on:</p> <ul style="list-style-type: none"> <li>• Opportunities to enhance the local environment through neighbourhood plan-making;</li> <li>• Where to find information about the local environment;</li> <li>• Good practice; and,</li> <li>• A checklist to use whilst developing the plan.</li> </ul>	Comments noted.
<b>Historic England</b>	<p>The approach seems rigorous and likely to form a solid foundation as a heritage evidence-base for the various site allocations proposed within the plan. The site allocations are all directly adjacent to the two main built-up areas. Therefore, we suggest that the SEA particularly seeks to address the potential of impact to heritage assets (and their settings) on and adjacent to these site allocations:</p> <p><u>Residential Allocations</u></p>	Comments noted.

Consultee	Consultation response summary	AECOM response
	<ul style="list-style-type: none"> <li>• Land off Halt Road, St Newlyn East</li> <li>• Land at Chapel Terrace, Mitchell</li> </ul> <p><u>Employment Allocations</u></p> <ul style="list-style-type: none"> <li>• Land rear of Metha Row St Newlyn East</li> <li>• Land off the A3076 Mitchell</li> </ul> <p><u>Community Allocations</u></p> <ul style="list-style-type: none"> <li>• Land at Four Winds Mitchell</li> </ul> <p>The draft heritage asset map isn't particularly legible. It is difficult for us to make any further comments until we are able to see the relationship between the identified heritage assets and the allocated sites more clearly illustrated. Therefore, we recommend mapping the assets on a series of zoomed-in maps for each allocated site.</p> <p>We have no specific comments to make at this point in time. However, we look forward to having the opportunity to comment further at the Regulation 14 consultation stage.</p>	
<p><b>Natural England</b></p>	<p>As statutory consultee under the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) we are providing advice in relation to the proper legal application of these regulations in particular; with a view to protection and enhancement of the natural environment. Natural England are also keen to contribute in a manner that sees the SEA process adds real value to the plan development process.</p> <p><b>Chapter 2. Air Quality</b></p> <p>Baseline summary and key issues – the scoping report, understandably, focusses on the human health impacts of air pollution and the proximity of the neighbourhood plan area to Air Quality Management Areas. Natural England advises that the Strategic</p>	<p>Comments noted. The effects of air pollution on the natural environment will be considered through the SEA process. It is recognised that a HRA is being carried out for the StNEM NP. The findings of which will inform the SEA.</p> <p>Additional policy context will be reviewed, and the key messages considered through the SEA,</p>

Consultee	Consultation response summary	AECOM response
	<p>Environmental Assessment should also consider the effects of air pollution on the natural environment, in line with the Clean Air Strategy.</p> <p>Air Pollution Information Service (APIS) provides specific air pollution advice based on habitats, ecosystems and species, and provides critical loads for acidity and nitrogen for designated features within every SAC, SPA or SSSI in the UK. Newlyn Downs SAC is within the Neighbourhood area and the Site Improvement Plan identifies atmospheric nitrogen deposition as a pressure threatening the condition of the SAC features, and the supplementary advice identifies a restore target for this attribute (for the temperate Atlantic wet heath).</p> <p><b>Chapter 3. Biodiversity and geodiversity</b></p> <p>Baseline summary and key issues - Natural England notes that a Habitats Regulations Assessment screening report was prepared for the St Newlyn East and Mitchell neighbourhood plan, which concluded that an Appropriate Assessment was required. The Strategic Environmental Assessment should be informed by and reflect the findings of the Appropriate Assessment.</p> <p><b>Chapter 7. Land, soil, and water resources</b></p> <p>Policy context – Natural England advises that the following plans should be reviewed, and the key messages considered as part of this chapter, where/if applicable to the plan area:</p> <p>South-West Draft River Basin Management Plan data South West Water - Water Resources Management Plan</p> <p>SEA Objectives – Natural England welcomes the assessment question that seeks to avoid the loss of best and most versatile agricultural land but would also welcome a sub-objective that assesses whether the plan promotes the sustainable management of soils within development schemes.</p>	<p>where/if applicable to the plan area.</p> <p>SEA framework updated to include the following objective:</p> <p><u>Land, soil, and water resources</u> Promote sustainable management of soils and efficient land use.</p> <p>And the following assessment question:</p> <p><u>Community wellbeing</u> Will the option/ proposal will help to: improve community access to green infrastructure and nature; and avoid impacts on the quality and extent of existing green infrastructure/recreational assets.</p>

**Consultee**

**Consultation response summary**

**AECOM response**

**Chapter 8. Community wellbeing**

Policy context – We advise that the Cornwall Countryside Access Strategy, though dated, might provide useful information relating to Cornwall’s right of way improvement plan, and strategy for the management of countryside access.

SEA Objectives - we would welcome the inclusion of sub-objectives that will assess whether the Plan improves community access to green infrastructure and nature; and whether it seeks to avoid impacts on the quality and extent of existing green infrastructure/recreational assets.

**General advice on baseline information**

Existing environmental evidence can be gathered from various sources including online data sources like MAGIC, Local Environmental Record Centres (LERCs) and strategies for green infrastructure, open space provision, landscape, climate and ecosystem services, and biodiversity opportunity mapping.

Natural England is working with Defra and other partners and stakeholders to deliver the Governments 25 YEP commitment to develop a National Framework of Green Infrastructure Standards. The GI Framework web portal provides a link to the GI Mapping Database which brings together data from over 40 individual environmental and socio-economic datasets. Local authorities and others may use the database to inform the development of local plans, policies and GI strategies, and can download the spatial files to add their own data to it.

## SEA framework

Table AB.2: SEA framework

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
Biodiversity	Protect and enhance biodiversity and geodiversity sites and features, by avoiding impacts on regionally and locally designated sites, and delivering demonstrable biodiversity net gains.	<ul style="list-style-type: none"> <li>Regionally and locally designated sites, including supporting habitats and mobile species that are important to the integrity of these sites?</li> <li>Protect and enhance priority habitats and species and the areas that support them?</li> <li>Achieve a net gain in biodiversity?</li> <li>Support enhancements to multifunctional green infrastructure networks?</li> <li>Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>
Climate change	Reduce the contribution to climate change made by activities within the Neighbourhood Area.	<ul style="list-style-type: none"> <li>Reduce the number of journeys made?</li> <li>Promote the use of sustainable modes of transport including walking, cycling and public transport?</li> <li>Increase the number of new developments meeting or exceeding sustainable design criteria?</li> <li>Generate energy from low or zero carbon sources?</li> <li>Reduce energy consumption from non-renewable resources?</li> <li>Support proposals for EV charging infrastructure?</li> </ul>
	Support the resilience of the Neighbourhood Area to the potential effects of climate change, including flooding.	<ul style="list-style-type: none"> <li>Ensure that inappropriate development does not take place in areas at higher risk of flooding, considering the likely future effects of climate change?</li> <li>Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> <li>Sustainably manage water runoff, reducing surface water runoff (either within the plan area or downstream)?</li> <li>Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood area?</li> </ul>

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
		<ul style="list-style-type: none"> <li>• Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> </ul>
Landscape	To protect and enhance the character and quality of the immediate and surrounding landscape.	<ul style="list-style-type: none"> <li>• Conserve and enhance the SAC and WHS?</li> <li>• Identify and protect designated local landscapes?</li> <li>• Protect and/ or enhance local landscape character and quality of place?</li> <li>• Conserve and enhance local identity, diversity and settlement character?</li> <li>• Identify and protect locally important viewpoints which contribute to character and sense of place?</li> <li>• Protect visual amenity and locally important views in the neighbourhood area?</li> <li>• Retain and enhance landscape features that contribute to the river setting, or rural setting, including trees and hedgerows?</li> </ul>
Historic environment	To protect, conserve and enhance the historic environment within and surrounding the Neighbourhood Area.	<ul style="list-style-type: none"> <li>• Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their settings?</li> <li>• Conserve and enhance the Conservation areas in the neighbourhood area?</li> <li>• Protect the integrity of the historic setting of key monuments of cultural heritage interest as listed in the Cornwall HER?</li> <li>• Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies?</li> <li>• Support access to, interpretation and understanding of the historic evolution and character of the Neighbourhood area?</li> </ul>
Land, soil and water resources	Promote sustainable management of soils and efficient land use.	<ul style="list-style-type: none"> <li>• Avoid the loss of high-quality agricultural land resources?</li> <li>• Avoid the unnecessary sterilisation of, or hindering of access to mineral resources in the Plan area?</li> <li>• Affect the integrity of waste infrastructure within and surrounding the Plan area?</li> </ul>

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
		<ul style="list-style-type: none"> <li>Promote any opportunities for the use of previously developed land, or vacant/ underutilised land?</li> </ul>
	<p>To protect and enhance water quality and use and manage water resources in a sustainable manner.</p>	<ul style="list-style-type: none"> <li>Avoid impacts on water quality?</li> <li>Support improvements to water quality?</li> <li>Ensure appropriate drainage and mitigation is delivered alongside development?</li> <li>Protect waterbodies from pollution, including NVZs?</li> <li>Maximise water efficiency and opportunities for water harvesting and/ or water recycling?</li> <li>Improve the resilience of water supplies?</li> </ul>
<p>Community Wellbeing</p>	<p>Ensure growth in the Parish is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.</p>	<ul style="list-style-type: none"> <li>Provide everyone with the opportunity to live in good quality, and affordable housing?</li> <li>Support the provision of a range of house types and sizes?</li> <li>Meet the needs of all sectors of the community?</li> <li>Provide flexible and adaptable homes that meet people's needs, particularly the needs of an ageing population?</li> <li>Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</li> <li>Encourage and promote social cohesion and active involvement of local people in community activities?</li> <li>Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>Minimise fuel poverty?</li> <li>Maintain or enhance the quality of life of existing local residents?</li> <li>Improve community access to green infrastructure and nature; and avoid impacts on the quality and extent of existing green infrastructure/recreational assets.</li> </ul>
<p>Transportation</p>	<p>Promote sustainable transport use and reduce the need to travel.</p>	<ul style="list-style-type: none"> <li>Support the key objectives within the Cornwall Local Transport Plan to encourage more sustainable transport?</li> <li>Enable sustainable transport infrastructure enhancements?</li> </ul>

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
		<ul style="list-style-type: none"><li>• Ensure sufficient road capacity to accommodate new development?</li><li>• Promote improved local connectivity and pedestrian and cyclist movement?</li><li>• Facilitate on-going high levels of home and remote working?</li><li>• Improve road safety?</li><li>• Reduce the impact on residents from the road network?</li><li>• Improve parking facilities?</li></ul>

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# Appendix C Reasonable alternatives assessment

This appendix presents the detailed findings of the initial assessment of alternative spatial strategy options within St Newlyn East, as established in Chapter 5 of this Report. The Options are set out below and illustrated in Figures 5.3 – 5.5 of the main Report:

- **Option A:** Site 1 and Site 9
- **Option B:** Site 3/4 and Site 9
- **Option C:** Site 8, Site 9 and Site 10

## Methodology

For each of the options, the assessment examines the likely significant effects on the baseline, drawing on the sustainability objectives identified through scoping (see Table 3.1) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). Considering this, there is a need to make considerable assumptions regarding how options will be implemented ‘on the ground’ and what the effect on certain receptors would be. Where there is a need to rely on assumptions to reach a conclusion on a ‘significant effect’ this is made explicit in the appraisal text.

Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best.

Finally, it is important to note that effects are predicted considering the criteria presented within Regulations.<sup>10</sup> So, for example, account is taken of the duration, frequency and reversibility of effects.

## Assessment findings

Assessment findings are presented in the tables overleaf. The summary findings of this assessment are presented in Chapter 6 of the main report.

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<sup>10</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

**Option A**

**Site 1 and Site 9**

**Option B**

**Site 3/4 and Site 9**

**Option C**

**Site 8, Site 9 and Site 10**

**Biodiversity**

Likely significant effect?	No	No	No
Rank of preference	1	2	3

**Commentary**

In terms of internationally designated sites, the Newlyn Downs Special Area of Conservation (SAC) is within 3 km of all options. Additionally, all options lie within the Zone of Influence (ZOI) for the Penhale Downs SAC. A Habitats Regulation Assessment (HRA) (2022) has been undertaken for the StNEM NP, with screening concluding that effects could not be ruled out only in relation to Penhale Dunes SAC and the Fal and Helford SAC. While further from the NP area than SAC's discussed above, development in the StNEM NP area is considered to have the potential to impact upon these SACs through recreational disturbance. It is however recognised that policy provisions within the Cornwall Local Plan and its supplementary planning documents, provide guidance to mitigate adverse effects in this respect where possible.

There are two Sites of Special Scientific Interest (SSSI) in the neighbourhood area – the Newlyn Downs SSSI is located within 650m south of sites 1 and 3/4 (Options 1 and 2), and the Carrick Heaths SSSI is located within 1 km south of sites 8, 9 and 10 (Option C). As such, the sites at St Newlyn East are subject to the Impact Risk Zones (IRZs) for the Newlyn Downs SSSI, and the sites at Mitchell are subject to the IRZs for the Carrick Downs SSSI. However, only site 3/4 (Option B) is considered to have the potential to deliver the level of growth required to consult with Natural England. Option B therefore is worst performing in this respect.

In terms of local biodiversity assets, the neighbourhood area contains Biodiversity Action Plan (BAP) Priority Habitats, including ancient and semi-natural woodland, traditional orchards, deciduous woodland and lowland heathland, as well as formal and informal green spaces. All sites have a level of boundary vegetation (hedgerows and / or mature trees) which should be retained and enhanced where possible. It is however noted development on sites included in Option C could result in biodiversity loss due to hedgerow removal in order to allow for site access. Option C is therefore is worst performing in this respect.

Conversely, it is noted that all options have the potential to provide enhancements to ecological networks, and will deliver at minimum 10% biodiversity net gain in line with national policy. This could include retaining and enhancing habitats, improving ecological connectivity to create biodiversity networks with the surrounding landscape, and include measures to attract wildlife to new development areas.

Overall, Option A is considered best performing given it is the least constrained by designated assets, and is not likely to require loss/ removal of biodiversity features to create site access. Option C is worst performing in light of the above, however no significant effects are predicted as a result of any of the options.

**Option A**

**Site 1 and Site 9**

**Option B**

**Site 3/4 and Site 9**

**Option C**

**Site 8, Site 9 and Site 10**

**Climate Change**

Likely significant effect?	No	Yes - positive	No
Rank of preference	2	1	3

**Commentary**

As explored under the transportation theme below, given the rural nature of the parish and limited sustainable transport opportunities it is likely that any additional growth will place increased pressures on road capacity through the increased use of private vehicle. This is likely to lead to associated impacts, such as an increase in congestion within the neighbourhood area. An increase in vehicle usage, and the built footprint, is likely to contribute to increased emissions in the neighbourhood area, leading to minor adverse effects for climate change mitigation. As such, it will be important to support proposals that help to minimise per capita emissions, including reductions in domestic energy consumption and the uptake of renewable sources.

In terms of the options, all are located adjacent to the existing built up area and settlement boundaries for the villages of St Newlyn East and Mitchell. Option A is best performing in terms of access to the centre of St Newlyn East, access to sustainable transport modes and facilitating safe pedestrian and cycle access, due to pavement on Station Road and the proximity of a bus stop. This is followed closely by Option B; supporting active travel uptake, particularly for local journeys. Option C is best placed in terms of access to the strategic road network surrounding Mitchell, however increasing use of the private vehicle does not support climate change objectives.

In terms of flood risk, all the sites at St Newlyn East village (sites 1 and 3/4 within Options A and B) are within Flood Zone 1 and are seen to be at low risk. Only site 1 (Option A) has areas within its perimeter at low risk of surface water flooding, towards the eastern and southern site boundaries. Additionally, all the sites within Mitchell village (Option C) are within Flood Zone 1 (again, seen to be low risk) and none are at risk of surface water flooding. However, wider policy provisions included in the Local Plan and the NPPF (2021) are likely to ensure suitable drainage is provided in development and mitigate effects linked to excess water. While it is therefore difficult to meaningfully differentiate between the options, Option A is ranked least positively due to the surface water flood risk present.

Consideration is also given to the economy of scale delivered through Option B. The delivery of 120 homes on site 3/4 will likely deliver supporting infrastructure, specifically a link road is proposed to reduce congestion within/ around the neighbourhood area. This is anticipated to lead to positive effects in relation to climate change objectives, reducing traffic emissions and improving access.

In light of the above, Option B is ranked most positively, reflecting minimal constraints and the opportunity to deliver a link road to support the community. Following this, Option C is ranked least positively given its location distant from the main settlement of St Newlyn East, and likely increased reliance on the private vehicle for travel.

**Option A**

**Site 1 and Site 9**

**Option B**

**Site 3/4 and Site 9**

**Option C**

**Site 8, Site 9 and Site 10**

**Landscape and Townscape**

Likely significant effect?	Yes - negative	Yes - negative	Yes - negative
Rank of preference	2	3	1

**Commentary**

Although the neighbourhood area does not sit within a protected landscape, it is within proximity to the Perranporth and Holywell Area of Great Landscape Value, which is located 2.5 km north west and is designated for its high landscape quality and distinctive characteristics<sup>11</sup>. The St. Agnes Heritage Coast and part of the Cornwall and West Devon Mining Landscape World Heritage Site are located approximately 5 km south west of the neighbourhood area, both of which are significant in the landscape and should have their features respected and enhanced. As such, development in the neighbourhood area will need to be considerate of this landscape context.

Site 9 is a constant across the options. Given it is a small, brownfield site located within the existing settlement boundary of Mitchell, development at the site is considered to have a limited landscape impact, with the potential for positive effects depending on the design and layout of development. Given that it is a constant across the options, it has no weight in the consideration and ranking of options.

Taking each option in turn:

- Option A includes two sites – one of which (Site 1) is adjacent to the built up area and settlement boundary of St Newlyn East, and the other (site 9) is within the built up area and settlement boundary of Mitchell. The option would not significantly change the size and character of the existing settlements. Development at Site 1 could be viewed from nearby properties on the eastern site boundary, and is also a greenfield site. The 2020 AECOM SOA concludes the site is of low landscape sensitivity but medium visual amenity sensitivity.
- Option B includes two sites - one of which is adjacent to the built up area and settlement boundary of St Newlyn East (Site 3/4), and the other is within the built up area and settlement boundary of Mitchell (Site 9). Development at Site 1 could negatively impact the local landscape, as the site is open in character with long views. Additionally, there are views into the site from a nearby public right of way and properties to the north, north west and west. Given its position on Halt Road, its greenfield nature, and in light of its size/scale (120 dwellings), development could change the visual approach of the village from the south east. Effects in this respect are likely to be exacerbated through the delivery of a link road, with negative effects likely to exist during construction as well as operation. However during operation it is recognised that the link road would offset any previous effects of congestion and bottlenecking through the village.

<sup>11</sup> Cornwall Council (2016) 'Cornwall Local Plan Strategic Policies 2010-2030' can be accessed [here](#).

- Option C includes three sites – two of which (site 8 and 10) are adjacent to the built up area and settlement boundary of Mitchell, and other is within the settlement (site 9). Development on the sites adjacent to the settlement boundary would result in the loss of greenfield sites; there could be views into the site from properties to the north, but boundary vegetation provides a level of screening and as such reduces the visual impact. However, these two sites have the potential to lead to changes to the existing settlement pattern by extending the built form to the south (which will also change the visual approach of the village from the south). This could lead to urban sprawl. However, both sites were concluded to have a low landscape sensitivity and a medium visual amenity sensitivity through the 2020 AECOM SOA.

Overall, Option B performs least positively, given the level of growth proposed on a landscape of medium landscape sensitivity and medium visual amenity sensitivity. The large greenfield site is open in character with long views across the landscape, and therefore the delivery of 120 homes plus a link road would likely lead to significant negative effects. Options A and Option C both include sites with low landscape and medium visual amenity sensitivities – however, given sites on the edge of Mitchell under Option C are screened to an extent, Option C is ranked most favourably.

**Option A**

**Site 1 and Site 9**

**Option B**

**Site 3/4 and Site 9**

**Option C**

**Site 8, Site 9 and Site 10**

**Historic Environment**

Likely significant effect?	No	No	Yes - negative
Rank of preference	2	1	3

**Commentary**

In relation to historic environment, the neighbourhood area is constrained by two conservation areas, one at each settlement. The St Newlyn East Conservation Area is located in the northern half of St Newlyn East village along with a Grade II\* listed building, 13 Grade II listed buildings, and a scheduled monument. The Mitchell Conservation Area incorporates most of the settlement of Mitchell, including nine Grade II listed buildings.

Site 9 is a constant across the options. It is located directly adjacent to the Mitchell Conservation Area (to the east of the site), and within 25m west of the Grade II listed building Wesleyan Chapel. Given it is a small, brownfield site located within the existing settlement boundary of Mitchell, development at the site could enhance the setting of the Mitchell Conservation Area through considerate development design (give the existing setting of the site is already built form). Given that it is a constant across the options, it has no weight in the consideration and ranking of options

Whilst none of the options contain designated heritage assets, a number the options are constrained to an extent, with the potential to impact the historic environment:

- Option A includes Site 1 which is located within 100 m south east of a Grade II listed building and west of the St Newlyn East Conservation Area. It is however noted that both of these designations are screened to some extent from the site)
- Option C includes two sites in proximity to the Mitchell Conservation Area (located to the north). Existing screening present within sites could reduce any adverse effects.

In light of the above, it is considered that development under Option A and Option C has the potential to impact the setting and intrinsic qualities of the local historic environment, including the impact on views to and from the conservation areas and the historic character of the neighbourhood area. It is noted that the potential for negative effects could be reduced through screening and mitigation, including adopting a landscape led approach to the design and layout of development proposals.

In terms of the wider historic environment, the neighbourhood area is located within 5km north east of the Cornwall and West Devon Mining Landscape World Heritage Site. All options have the potential to increase pressure on this historic landscape, however in line with higher level policy provisions (including the Cornwall and West Devon Mining Landscape World Heritage Site management plan), it is likely any residual effects will be negligible. All options are considered to perform equally in this respect.

Taking the above findings into consideration, Option B is considered to perform most positively, as is least constrained in terms of historic assets. Following this, Option C is ranked the least favourably as this option includes numerous greenfield sites located adjacent to the Mitchell conservation area with the potential to lead to residual negative effects. It is however noted that there is some screening in place in the form of boundary vegetation.

**Option A**

**Site 1 and Site 9**

**Option B**

**Site 3/4 and Site 9**

**Option C**

**Site 8, Site 9 and Site 10**

**Land, Soil, and Water Resources**

Likely significant effect?	Yes – negative	Yes – negative	Yes - negative
Rank of preference	1	3	2

Commentary

All options seek to deliver growth on greenfield land, with the exception of site 9 which is a mix of greenfield and brownfield land. However this site is a constant throughout all options and does not impact upon overall rankings. Additionally, all sites (with the exception of constant site 9) are underlain with Grade 2 best and most versatile agricultural land. The development of sites under all options will therefore lead to long term negative effects as it removes land better suited for agricultural uses and does not promote the efficient land use. All options are considered to perform poorly for land and soil quality and are likely to result in significant negative effects. In terms of ranking the options it is considered that the option with greatest land landtake will lead to effects of greatest significance. Option A is therefore best performing , followed by Option C, and finally the largest option, Option B.

Regarding the water environment, none of the site options are constrained by watercourses (within or in close proximity). Only Option C, sites within Mitchell, are associated with a Nitrate Vulnerability Zone (NVZ) (Eutrophic Water ET5 – Truro, Tresillian and Falmouth). However, as the neighbourhood plan is allocating land for residential development, it is not considered likely to significantly increase the risk of pollution to the NVZ.

No part of the neighbourhood area overlaps with Mineral Safeguarding Areas or Mineral Consultation Zones.

Overall, it is considered that the delivery of all options will result in the loss of greenfield, high quality agricultural land, which has the potential to lead to significant negative effects. Options are ranked by size, with Option B considered worst performing as a result of the higher landtake, and therefore greater loss of BMV/ greenfield land than other options.



**Option A**

**Site 1 and Site 9**

**Option B**

**Site 3/4 and Site 9**

**Option C**

**Site 8, Site 9 and Site 10**

**Community Wellbeing**

Likely significant effect?	No	No	No
Rank of preference	2	1	3

Rank of preference

**Commentary**

A key consideration for this SEA theme is the delivery of new homes to meet identified housing needs, including the needs of different groups within the community. As such, all options perform positively in this respect as they are all providing more housing stock.

Integration with the community and accessibility to amenities are key to ensuring the quality of life of residents is maintained and enhanced. All of the sites are located well in relation to the existing villages, as they are all within 500 metres of village centres and are located adjacent to the built up areas and settlement boundaries for St Newlyn East and Mitchell (except site 9, which is within the built up area and settlement boundary for Mitchell).

The St Newlyn East sites (sites 1 and 3/ 4) are located within 500 metres of a bus stop, the St Newlyn East primary school, the cricket club and skate park, the local shop (Londis) and route 32 of the Sustrans National Cycle Network. As such, development through Option A and Option B could result in a lower reliance on private vehicles to access services, facilities and amenities within the settlement of St Newlyn East. Option C is focussed around Mitchell (sites 8, 9 and 10), and are removed from the community hub of St Newlyn East. While sites are within 500 metres of a bus stop and a play park, the village does not have key infrastructure (such as a shop or a school) within the settlement.. As such, Option C is considered worst performing, as would likely increase reliance on the private vehicle to access the key facilities available within the neighbourhood area. Additionally, development through Option C could be negatively impacted by and contribute to the existing noise and light pollution experienced in Mitchell due to the proximity of the A30.

However, due to the lack of infrastructure within the neighbourhood area, for example a supermarket and health and secondary school education facilities, development through any of the three options would result in an increased need for residents to travel out of the neighbourhood area to access a wider variety of services. All options are at least one kilometre from the nearest supermarket, train station, secondary school and health infrastructure (GP surgery and dentist). These facilities are available in Newquay, which is a twelve minute drive from the village of St Newlyn East and a 15 minute drive from Mitchell. However, the scale of growth proposed through Option B (120 homes across site 3/4) will likely deliver supporting infrastructure, specifically a link road is proposed to connect Halt Road with Station Road to allow the community improved access to the local road network, which can aid in accessing facilities outside the neighbourhood area. This is anticipated to lead to positive effects in relation to community wellbeing.

Overall, Option B is considered to be the most preferable, due to the level of growth proposed through this option, the proximity of the St Newlyn East sites to the village centre and existing infrastructure and the potential to deliver additional infrastructure including a link road. Option A is ranked the second most favourable due to the proximity of Site 1 to St Newlyn East village centre and its facilities. Option C is ranked the least favourably given the relative lack of infrastructure in Mitchell

(facilities and opportunities for sustainable and active travel), which will result in the increased reliance on the private vehicle and the continued disconnection from St Newlyn East.

**Option A**

**Site 1 and Site 9**

**Option B**

**Site 3/4 and Site 9**

**Option C**

**Site 8, Site 9 and Site 10**

**Transportation**

Likely significant effect?	No	Yes - positive	No
Rank of preference	2	1	2

**Commentary**

In terms of access to sustainable transport, whilst there are two train stations present in the middle of the neighbourhood area, these serve the Lappa Valley Steam Railway, which is a recreational train line. The closest rail service connecting with the wider region is Quintrell Downs, located approximately 1 km north of the neighbourhood area. This is on the Newquay to Par train line; providing infrequent connections to Newquay, St Columb Road, Roche, Bugle, Luxulyan and Par. There are two bus routes and six bus stops within the neighbourhood area; service 850 provides access to Newquay and Truro College via Treloggan, Goonhavern and Perranporth, and service 85 offers access to Newquay and Truro via Crantock, Holywell Bay and Zelah. In the context of the above, all options perform equally given their proximity to a bus stop. Nonetheless, given the limited sustainable transport options and relative rural nature of the neighbourhood area, development across all options are likely to lead to a continued dependency on private vehicles to some extent.

Option B is considered to perform more positively than other options due being of scale to include the provision of a link road alongside housing growth. This link road would provide multiple benefits, including improved accessibility to the local road network and settlements, reduced congestion in the neighbourhood area and reducing the amount of traffic passing through the centre of St Newlyn East village (which will support safer pedestrian access).

All options are positioned well in relation to the two villages, and within walking distance of their centres. However, Option A and Option B have increased access to services and facilities in the settlement of St Newlyn East which are not present in Mitchell for Option C. None of the sites at St Newlyn East (Option A and B) are within proximity to a public right of way (PRoW); only site 8 (Option C) at Mitchell is within proximity to a PRoW, with the public footpath 324/6/1 on its western site boundary.

As the constant site across the options, site 9 does not contribute to differentiating between the sites. Access to this site is presumed to come from the road on the southern site boundary, which does have existing pavement on either side of the road to facilitate safe pedestrian and cycle access. In terms of the variable sites:

- Access to site 1 under Option A would be achieved by come from a single track connecting to Station Road in the eastern part of the site. This is currently unsuitable as the track is not a suitable width; it also does not provide for safe pedestrian and cycle access, however Station Road has pavement on both sides of the road to facilitate active transportation methods in the village. Station Road connects to Carholl Road in the north, which provides access to the A3075 to the west within the neighbourhood area, and northwards to The Butts which provides access to the local road network and the A3075 north outside of the neighbourhood area. Station Road also runs south to meet the B3285 and the A30 outside of the neighbourhood area.
- Access to site 3/4 under Option B would be achieved by the link road being built between Halt Road and Station Road. Station Road connects to Carholl Road in the north, which provides access to the A3075 to the west within the neighbourhood area, and northwards to The Butts which provides access to the

local road network and the A3075 north outside of the neighbourhood area. Station Road also runs south to meet the B3285 and the A30 outside of the neighbourhood area. Halt Road also runs south-west to allow access to Mitchell and the A30 within the neighbourhood area. Station Road can provide for safe pedestrian and cycle usage given the pavements on the road, but Halt Road cannot.

- Access to site 8 under Option C would be achieved through the north east site corner linking to Pillars Close. The footpath on the western site boundary allows safe pedestrian access to West Dower and Hendra Farm to the south outside of the neighbourhood area, and connects to a bridleway that provides access to Carland Cross. The site can provide safe and cycle access. Access to site 10 under Option C could be provided from a turning point on Fair Park View, which allows access to the A30 and A3076 to the north within the neighbourhood area and south to Trelassick and Ladock outside of the neighbourhood area. This road does not currently have pavement to facilitate safe active transportation methods, but there are proposals for a multi-use trail for Halt Road that would provide this.

It is noted that the A30 passes through Mitchell. As such, Option C will have good access to the strategic transport network due to the proximity to the A30 and A3076, and would support access to neighbouring settlement centres. This could be a benefit for the community in terms of providing easier access to sources of employment as well as education and health infrastructure. However, it would also increase the reliance on private vehicles and reduce opportunities for sustainable travel uptake.

Overall, it is concluded that Option B is best performing. Option B delivers economy of scale to provide a link road alongside development, which will improve access to the strategic road network and reduce congestion through the neighbourhood area. Option B is also located within proximity to a bus stop, has good access to the road network and has the potential to facilitate pedestrian and cycle access to the village centre and its local facilities.. This is followed by Option A, with Option C worst performing due to the limitations within Mitchell.

## Overall summary

The assessment has highlighted the potential effects as a result of development across the three options. In terms of biodiversity, all options have the potential to adversely impact on internationally designated sites through water and air quality impact pathways. It is considered that the StNEM NP will be assessed through the HRAAA, with any recommendations addressed to avoid residual adverse effects. Option B will require consultation with Natural England given site 3/ 4 overlaps with SSSI IRZs for the type of development likely to be brought forward, and Option C could result in biodiversity loss due to hedgerow removal to allow for access. It is also recognised that all options will be required to deliver a 10% biodiversity net gain, and that landscape-led masterplanning at sites could support improvements to the biodiversity in the long term.

In terms of landscape, all options could result in changes to the baseline, specifically changes to the setting of protected landscapes such as the St. Agnes Heritage Coast. Options have the potential to impact upon the existing settlement pattern, landscape character and setting through greenfield development outside of the built up area, with Option B identified as worst performing in this respect. This reflects the level of growth alongside infrastructure delivery (i.e. a link road).

In terms of the historic environment, Option C has the potential to impact the Mitchell Conservation Area through the delivery of sites 8 and 10. Option A is also constrained by designated assets, and therefore Option B is best performing in relation to this SEA theme. It is recognised mitigation through considerate design, landscaping and screening methods are likely to reduce residual effects to some extent.

All options will result in the loss of BMV greenfield land, with the potential for long term negative effects. Options are ranked by level of landtake, with Option B therefore performing worst in this respect.

Finally, all options are located within or adjacent to the built up area and settlement boundaries of the villages of St Newlyn East and Mitchell, and therefore have easy access to the village centres and associated infrastructure/ services. However, reflecting the limited offer of Mitchell, Option C performs least positively as it disconnects from the community hub of St Newlyn East, and would not support active travel uptake; likely leading to increased reliance on the private vehicle (and the A30). Option B is best performing as it offers economy of scale to deliver a link road, which will improve accessibility, reduce congestion, and support healthy communities.

