Cornwall Site Allocations
Development Plan Document

Sustainability Appraisal Report to accompany Regulation 19 consultation

March 2017
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Non-technical summary

This Sustainability Appraisal (SA) Report accompanies the Spring 2017 consultation on the Cornwall Site Allocations Development Plan Document (Allocations DPD).

NTS1: What is sustainability appraisal?
A Sustainability Appraisal (SA) has been undertaken to inform the development of the Allocations DPD.

SA is a process that Local Planning Authorities such as Cornwall Council are legally bound to undertake for their Local Plans. The SA has incorporated a Strategic Environmental Assessment (SEA) process, as required by the SEA Regulations. Local Planning Authorities use SA to assess Local Plan documents against a set of sustainability objectives developed in consultation with interested parties. The purpose of the appraisal is to help avoid negative environmental and socio-economic effects and identify opportunities to improve the environmental quality of Cornwall and the prosperity and quality of life of residents through the plan.

NTS2: Details of the Allocations DPD
Cornwall Council is currently preparing a new Local Plan to replace the district Local Plans¹ and the Cornwall Minerals Local Plan and the Cornwall Waste Local Plan. The overarching document for the Local Plan, the Cornwall Local Plan: Strategic Policies 2010-2030 (LP:SP) was adopted in November 2016. This set out the land use policies to meet Cornwall’s economic, environmental and social needs and aims for the future, and set the framework for all subsequent documents prepared which form part of the Local Plan.

Cornwall Council is currently preparing the Allocations DPD to support the delivery of policies within the LP:SP. The purpose of the Allocations DPD is to allocate land for a range of uses to meet the growth targets for the main towns in Cornwall, as set out in the LP:SP. Sites for development included in the Allocations DPD relate to housing growth, commercial growth and enabling infrastructure. In addition, the Allocations DPD identifies strategically important employment² sites that should be safeguarded, in line with Policy 5 of the LP:SP document.

Cornwall Council is currently consulting on the ‘Regulation 19 consultation’ version of the Allocations DPD, which is the version of the document Cornwall Council view is ready for examination. This follows consultation undertaken on an earlier version of the Allocations DPD in October 2016.

NTS3: Purpose of the SA Report
The SA Report, which accompanies current consultation on the Allocations DPD, is the latest document to be produced as part of the SA process.

The purpose of this SA Report is to:

- Identify, describe and evaluate the likely significant effects of the Allocations DPD document and any reasonable alternatives; and

¹ Including the Caradon, Carrick, North Cornwall, Penwith and Restormel Local Plans
² For reference, where the terms employment use or employment site are used within this document it relates to the use classes B1, B2 and B8, unless otherwise stated.
• Provide an opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA process.

The SA Report contains the following elements:

• An outline of the contents and main objectives of the Allocations DPD and its relationship with other relevant policies, plans and programmes;
• A description of the current state of the environment and key sustainability issues;
• The SA Framework of objectives and appraisal questions and criteria against which the Allocations DPD policies and alternatives has been assessed;
• The appraisal of alternative approaches for the Allocations DPD;
• The likely significant effects of the current Allocations DPD policies;
• The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Allocations DPD; and
• The next steps for the Allocations DPD and the accompanying SA process.

NTS4: Appraisal of reasonable alternatives for the Allocations DPD

A key requirement of the SEA Regulations is to appraise ‘reasonable alternatives’ for the Allocations DPD. To address this requirement, a number of alternative approaches have been considered in relation to the location and distribution of new development in the main towns of Cornwall.

More specifically, reasonable alternatives have been considered in regard to the following elements:

• Broad locations for development around each town;
• Site options; and
• Site policy options.

The alternative options considered and appraised for each town, the appraisal findings and recommendations, and responses to these, are presented in Chapter 7 and Appendices 3-12 of this SA Report and the Housing and Employment Evidence Base Reports which accompany the Allocations DPD (available at www.cornwall.gov.uk). This is accompanied by an overview of how the consideration of alternative development strategy options through the SA process has informed choices relating to the Allocations DPD, including relating to the choice of sites for allocation in the plan.

Figure NTS 1 summarises how the SA process has informed the Allocations DPD’s development process.
Figure NTS 1: How the SA process has informed the development of the policies presented within the Allocations DPD

Outputs from various work streams, such as...

- Environmental Assessment (including, historic, ecological, agricultural and landscape constraints)
- Accessibility Constraints/Opportunities
- Landscape Assessments
- Potential for sustainable energy
- Economic potential
- Design constraints

(Informing)

Key SA Stages

- Options Stage SA\(^3\)
- Site Prioritisation Stage SA\(^4\)
- Final Policy Formation Stage\(^5\)

(Informing)

Policy Development Stages

- Site Options
- Site Selection
- Site Allocations DPD Policy Wording

\(^3\) Reported as part of TFP Background Papers (www.cornwall.gov.uk)
\(^4\) Presented as part of the site selection process which is documented within the Housing and Employment Evidence Base Reports for each town (available at www.cornwall.gov.uk)
\(^5\) Presented in Appendices 3-12 of this SA Report, updating work undertaken during the preparation of the October 2016 consultation version of the Allocations DPD.
NTS6: Appraisal of the current version of the Allocations DPD

The current SA Report presents an appraisal of the latest version of the Allocations DPD (March 2017).

The appraisal has been presented in Appendices 3-12 of the SA Report, which present the appraisal of the site policies for the ten towns of:

- Bodmin
- Camborne-Pool-Illogan-Redruth
- Falmouth and Penryn
- Hayle
- Helston
- Launceston
- Newquay
- Penzance & Newlyn
- Saltash
- St Austell

In relation to the other main towns in Cornwall, the Allocations DPD has not identified sites for a town where a Neighbourhood Plan is actively being taken forward and where this Neighbourhood Plan is, or will be, seeking to address meeting the strategic growth targets set out by the LP:SP through its policies. As such site policies have not been considered and appraised through the SA process for Truro, St Ives, Liskeard, Wadebridge, Lostwithiel and Bude.

The table below presents a summary of the key potential significant effects identified through the appraisal of the proposed policies for the sites allocated in each town. These have been presented under 19 sustainability themes.

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<td>STA-R1 Old Vicarage Place</td>
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**Key:**

- **---** Likely to significantly undermine the SA Objective
- **-** Likely to undermine the SA Objective
- **+/-** Likely to neither undermine or contribute to meeting the SA Objective
- **+** Likely to support the SA Objective
- **++** Likely to lead to a significant contribution towards meeting the SA Objective
- **?** Impacts unknown
- **0** Objective/criteria not relevant

**NTS 6**
NTS7: Next Steps
This SA Report accompanies the current consultation on the Allocations DPD (Spring 2017).

Following this consultation, the Allocations DPD and accompanying information (including consultation responses and the SA Report) will subsequently be submitted by Cornwall Council to the Planning Inspectorate for Examination later in 2017.
1. Introduction

This Sustainability Appraisal (SA) Report accompanies the Spring 2017 consultation on the Cornwall Site Allocations Development Plan Document (Allocations DPD).

The Allocations DPD supports the delivery of policies within the Cornwall Local Plan: Strategic Policies document (LP:SP). The purpose of the Allocations DPD is to allocate land for a range of uses to meet the growth targets for the main towns in Cornwall (as set out in the LP:SP), where these targets support the spatial vision and objectives of Cornwall and its communities.

The Allocations DPD presents site policies for the following main towns in Cornwall:

- Bodmin
- Camborne-Pool-Ilogan-Redruth
- Falmouth and Penryn
- Hayle
- Helston
- Launceston
- Newquay
- Penzance & Newlyn
- Saltash
- St Austell

In relation to the other main towns in Cornwall, the Allocations DPD has not identified sites for a town where a Neighbourhood Plan is actively being taken forward and where this Neighbourhood Plan is, or will be, seeking to address meeting the strategic growth targets set out by the LP:SP through its policies. As such site policies have not been included in the current version of the Allocations DPD for Truro, St Ives, Liskeard, Wadebridge, Lostwithiel and Bude.

2. Sustainability Appraisal

The Planning and Compulsory Purchase Act 2004 introduced a requirement to carry out a SA as an integral part of preparing local development documents such as the Allocations DPD. SA considers and communicates the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan-making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the emerging Allocations DPD’s contribution to sustainable development.

An SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law European Union Directive 2001/42/EC ‘on the assessment of the effects of certain plans and programmes on the environment’. SA widens the scope of the assessment to also include social and economic issues.

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7 For Bude, CC will be carrying out separate allocations for Bude-Stratton (to follow this Allocations DPD) and in order to compliment the Bude-Stratton NDP.
The SEA Regulations require that an environmental report is published for consultation alongside the draft plan that ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. The environmental report must then be taken into account, alongside consultation responses, when finalising the plan. This SA Report serves that purpose.

The ‘likely significant effects on the environment’ include those indicated in Annex I of the SEA Directive as ‘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’. Reasonable alternatives to the plan need to take into consideration the objectives of the plan and its geographic scope. The choice of reasonable alternatives is determined by means of a case-by-case assessment.

3. This SA Report

At the current stage of plan-making, Cornwall Council is undertaking formal ‘Regulation 19’ consultation on the Allocations DPD. Following this stage of consultation the Allocations DPD and this report will be updated as necessary and the Allocations DPD will then be submitted to the Secretary of State for Examination.

This SA Report is produced with the intention of informing the consultation and any subsequent updates to the Allocations DPD prior to Examination being undertaken later in 2017. The document should be read in conjunction with the Housing and Employment Evidence Base documents (available at www.cornwall.gov.uk), which contains SA work carried out during the development of the Allocations DPD.

The SA process has five key stages. These stages are:

- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope (output – Scoping Report, June 2010 and updated version May 2012)
- Stage B: Developing and refining plan options (output – SA Reports on Draft Town Framework Plans (these were produced at varying dates for the towns between an overall period of January 2012 – April 2014))
- Stage C: Appraising the effects of the plan (output – Cornwall Local Plan: Site Allocations DPD Sustainability Appraisal Report, September 2016)
- Stage E: Monitoring the implementation of the plan (output – annual Cornwall Monitoring Report)

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This SA Report summarises Stages A to C of the SA process and provides the reporting for Stage D. Stage C of the SA process is the main assessment element and consists of five key tasks:

- Testing on a town basis, the individual site allocation policies against the SA objectives and criteria;
- Developing and refining policy wording;
- Predicting and assessing effects;
- Identifying mitigation measures; and,
- Developing monitoring proposals.

In the context of the above, this SA Report addresses the following questions:

- What is the Allocations DPD trying to achieve?
- What is the sustainability context?
- What is the baseline situation?
- What would the situation be without the plan?
- What are the key issues?
- How has the appraisal been undertaken?
- What reasonable alternatives have been considered?
- What are the appraisal findings and recommendations?
- How have SA recommendations been taken into account?
- What difficulties were encountered through the process and any limitations?
- How can we best monitor the plan’s impacts?
- What are the next steps?

4. What is the Allocations DPD trying to achieve?

The purpose of the Allocations DPD is to allocate land for a range of uses to meet the growth targets for the main towns (as set out in the LP:SP), where these targets support the spatial vision and objectives of Cornwall and its communities. Sites included for development relate to housing growth, commercial growth and enabling infrastructure. In addition, the Allocations DPD identifies strategically important employment sites that should be safeguarded, in line with Policy 5 of the LP:SP document.

Cornwall Council prepared the Allocations DPD to support the delivery of policies within the LP:SP. The Allocations DPD is one of a suite of planning documents that make up Cornwall’s Local Plan. The LP:SP, sets out the strategy to guide spatial planning in Cornwall up to 2030 and establishes the principles of development and broad locations for growth. The examination of the LP:SP was completed in August 2016, and the document adopted in November 2016.

The LP:SP contains overarching planning policies for Cornwall and sets out targets for growth (employment and housing) across the different locations in Cornwall (these locations being based on Community Network Areas (CNA)). The development of the LP:SP was accompanied by its own SA process, which considered reasonable alternatives for the broad spatial strategy to be taken forward for the Local Plan.

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9 For reference, where the terms employment use or employment site are used within this document it relates to the use classes B1, B2 and B8, unless otherwise stated.
The LP:SP is not concerned with detailed policy issues such as the allocation of specific sites for development – this is addressed by the Allocations DPD. In this context the Allocations DPD provides more detail on how the housing and commercial targets set out in the LP:SP can be delivered, particularly for Cornwall’s larger towns. The policies within it are in conformity with the LP:SP and National Planning Policy Framework (NPPF).

Neighbourhood Development Plans (NDP) will also form an important part of Cornwall’s suite of planning documents. To ensure a complementary set of documents and to support the principles of Localism, the Allocations DPD has not identified sites for a town where a NDP is actively being taken forward and where this NDP is, or will be, seeking to address meeting the strategic growth targets set out by the LP:SP through its policies.

This assessment undertaken through the SA process only covers the towns where policies are included which allocate sites within the Allocations DPD, with these towns being:

- Bodmin
- Camborne-Pool-Ilogan-Redruth
- Falmouth and Penryn
- Hayle
- Helston
- Launceston
- Newquay
- Penzance & Newlyn
- Saltash
- St Austell

The Allocations DPD sets out site allocations in St Austell’s China Clay Area for Eco-Communities. However, these proposals have been subject to a separate SA process and consequently are not reported within this report. Instead, details on SA work undertaken for the St Austell China Clay Area Eco-Communities can be found separately at www.cornwall.gov.uk.

5. What is the sustainability context and baseline situation, and what are the key sustainability issues?

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 Natural England, the Environment Agency and Historic England. These authorities were consulted on the scope of the Local Plan SA in 2010.

The Scoping Report presented three elements, as follows:

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10 In line with Article 6(3).of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme’.
Context review and baseline data

An important step when seeking to establish the appropriate scope of an SA involves reviewing the sustainability context from key policies, plans and programmes. From the SEA Regulations it is understood that there is a need to identify key international, regional and local objectives and issues.

The Scoping Report also included a detailed baseline review which aids understanding of the current and likely future situation in the plan area and therefore the identification and evaluation of 'likely significant effects' associated with the emerging plan and reasonable alternatives.

The context review and baseline information initially included in the SA Scoping Report has been periodically updated since 2010 and provides the information base for the appraisal. Appendix 1 presents a summary of the updated context review and the baseline data.

Key sustainability issues

Drawing on the review of the sustainability context and baseline, the SA Scoping Report identified a range of sustainability problems / issues that should be a particular focus of SA, ensuring that it deals with the most important sustainability issues. The key issues identified are presented in Appendix 1.

6. SA Framework and themes

These key sustainability issues were then translated into an SA ‘framework’ of objectives and appraisal questions. The SA Framework provides a benchmark or yardstick against which the sustainability effects of the Local Plan document and alternatives can be identified and evaluated based on a structured and consistent approach. In this context, the objectives and appraisal questions which comprise the SA Framework provide a methodological framework for the appraisal of likely significant effects on the baseline.

The full SA Framework of objectives and appraisal questions that have been used as the basis of the SAs undertaken for Local Plan DPDs in Cornwall is presented in Appendix 1.

SA themes

The SA Framework and the appraisal findings in this SA Report have been presented under 19 themes, reflecting the range of information being considered through the SA process. These are:

Environment themes

- Climatic Factors
- Waste
- Minerals and Geodiversity
- Soil
- Air
- Water
- Biodiversity
- Landscape
7. How has the appraisal been undertaken?

The SA has been undertaken by Cornwall Council’s Sustainability Officers in liaison with the planning policy authors of the Allocations DPD. Initial training was provided by the Sustainability Officers for the planning policy authors on sustainability issues, the SA method and the sustainability objectives shown in Appendix 1. This has helped ensure that they are embedded within the day to day approach adopted by planners and a key consideration when examining whether sites are suitable for development. This training allowed a consistent approach to be followed in the appraisal process from the outset.

SA on Local Level Visions and Objectives

In addition to presenting Site Allocation and Safeguarding Policies, the Allocations DPD presents the contexts behind these policies for each of the towns, including setting out each town’s local Vision and Objectives through the plan period. For the majority of towns, these Visions and Objectives were subject to a SA at Stage B of the SA Process (developing and refining plan options) in order to check that these overarching aims were compatible with the SA Objectives. A review of the SA of the Visions and Objectives was also carried out to ensure that no significant impacts are apparent where Visions and Objectives for towns may have altered.

The reviewed SA on the local Vision and Objectives for each town are included in Appendices 3-12.

SA of the Policies of the Allocations DPD

The SA and the development of the Site Allocation policies presented within the Allocations DPD has been an iterative process. Findings and considerations of the SA have been taken on board by the policy planners at every stage in the drafting of the policies and in the process of selecting sites. The SA has been a consistent thread throughout. It has served as a means to collate the information gained from the numerous strands of work carried out throughout the site selection process and has

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11 With the exception of for Saltash, where the local Vision and Objectives will be presented as part of the Neighbourhood Development Plan for the town.

12 See Section 2 of this report.
played a key role in informing the selection of the final site proposals, where the outcomes of the SA were considered in Site Prioritisation Assessments. The Site Prioritisation Assessments considered the results of the SA for each site, together with a comparison of sites with regards to how each performs in relation to availability, viability and benefit to a wider town strategy\textsuperscript{13}.

In order to break down this thread of work, it is possible to identify three key stages in the SA development for the majority of towns\textsuperscript{14}. These are:

- **Stage 1: Options Stage SA** (reported as part of the TFP Background Papers, available at www.cornwall.gov.uk)
- **Stage 2: Prioritisation Stage SA** (presented as part of the site selection process which is documented within the Housing and Employment Evidence Base Reports for each town, also available at www.cornwall.gov.uk)
- **Stage 3: Policy Formation Stage SA** (presented in Appendices 3-12 of this report)

**Figure 1** illustrates the thread of the SA in the process of developing the Site Allocation policies of the Allocations DPD. A summary of the three stages is outlined below:

**Stage 1: Options Stage SA**

Work has been carried out since 2010 in developing the Allocations DPD. The early stages of work took the form of the development of Draft Town Framework Plans (TFPs) for the majority of main towns in Cornwall:

- Bodmin
- Camborne-Pool-Illogan-Redruth
- Falmouth and Penryn
- Hayle
- Helston
- Launceston
- Newquay
- Penzance & Newlyn
- Saltash
- St Austell
- Bude, Liskeard and St Ives\textsuperscript{15}

TFPs were intended to provide more local, place specific guidance and set out aspirations for how towns wish to develop in the future, providing the opportunity for more local level detail than the Allocations DPD. The TFPs were developed in partnership with local community representatives, in the form of Steering Groups

\textsuperscript{13} For further information see the Housing and Employment Evidence Base Reports, available at www.cornwall.gov.uk.

\textsuperscript{14} In the instance of Bodmin and Newquay, the Prioritisation Stage SA was not required (please refer to relevant housing and employment evidence base reports for further details (both available at www.cornwall.gov.uk)).

\textsuperscript{15} NB: Policies addressing site allocations for these towns are not included in the Allocations DPD. Liskeard and St Ives are developing NDPS which will include policies to address how strategic growth targets (set by the LP:SP) will be met, whilst CC will be carrying out separate allocations for Bude-Stratton (to follow this Allocations DPD) and in order to compliment the Bude-Stratton NDP.
consisting of the local Cornwall Council members, and representatives from the Town and Parish Council’s covered by the TFP and other interested groups, such as Chambers of Commerce and local Town Forums.

Work on the Draft TFPs involved the identification of site options on which future strategic development could potentially be accommodated. These site options were selected by following a stepped process which included desk based environmental and accessibility assessments, on site landscape assessments, an assessment of connectivity issues and consultation with key stakeholders (this process is fully documented in the TFP Background Papers and the Housing Evidence Reports16). This work formed the foundation from which the Allocations DPD was developed. Draft TFPs were produced for the towns between 2012 and 2014, setting out site options for consideration, with these being accompanied by supporting information detailing the SA undertaken at that (options) stage. The majority of the Sustainability Reports produced, at the Draft TFP stage, documented both a SA of the Draft TFP Vision and Objectives; and, SAs of the option sites for housing/mixed use development - the exceptions being Bodmin, Helston and St Austell where the Draft TFP SAs focused on the site options; however a SA considering the local Vision and Objectives for each these towns is presented as part of this report, within each towns respective appendix.

In January 2012 there was consultation on options for the location of allocations, as part of the Planning Future Cornwall: Core Strategy Area Based Discussion Papers. There were also four additional public consultation exercises for three towns that were not covered by the 2012 consultation:

- Bodmin Public Consultation – March 2013
- Bodmin Public Consultation – October 2013
- Helston Public Consultation – March 2013
- St Austell Public Consultation – April 2014

The CPIR Strategy and sites was also subject to previous public consultations in 2011, which was used to help formulate the development of the areas strategy.

Although all towns reached the stage where Draft TFPs were produced, the planning documents that will finally be produced vary for each of the towns. The documents that will set out the planning approach for each town are set out in Table 1 below.

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16 Available at www.cornwall.gov.uk
Table 1: The planning documents to be produced for each town

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<thead>
<tr>
<th>Town</th>
<th>Planning Document(s)</th>
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<tr>
<td>Bodmin</td>
<td>Allocations DPD &amp; TFP</td>
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<tr>
<td>Bude</td>
<td>NDP (and separate Allocations DPD, to follow)</td>
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<tr>
<td>Camborne-Pool-Illogan-Redruth</td>
<td>Allocations DPD &amp; TFP</td>
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<td>Falmouth and Penryn</td>
<td>Allocations DPD, NDP &amp; TFP</td>
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<tr>
<td>Hayle</td>
<td>Allocations DPD, NDP &amp; TFP</td>
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<tr>
<td>Helston</td>
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<td>Launceston</td>
<td>Allocations DPD &amp; TFP</td>
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<td>Liskeard</td>
<td>NDP</td>
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<td>Newquay</td>
<td>Allocations DPD, NDP &amp; TFP</td>
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<td>Penzance &amp; Newlyn</td>
<td>Allocations DPD, NDP &amp; TFP</td>
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<td>Saltash</td>
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<td>St Austell</td>
<td>Allocations DPD &amp; TFP</td>
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<tr>
<td>St Ives</td>
<td>NDP</td>
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After the option sites were identified in the Draft TFPs and consulted on, work continued to refine the sites in order to select the most appropriate to be proposed in the Allocations DPD.

The SA reports from this stage of work can be found within the TFP Background Papers, available at www.cornwall.gov.uk.

Stage 2: Site Prioritisation Stage SA

Between the consultation on the Draft TFPs (2012-2014) and the finalisation of proposed sites (2017) a number of aspects needed to be taken into account, as outlined below. In particular, where areas housing and employment targets had altered due to amendments to the LP:SP policies, as a result of recommendations resulting through the LP:SP examination process.

This step saw the work carried out up to the consultation on the Draft TFPs (2012-2014) further progressed in order to determine which site(s) would be included within Allocations DPD (2016). In determining the proposed sites, the following considerations were taken into account:

a) the requirements set out by Cornwall’s LP:SP;
b) the forecast urban capacity of the towns for the plan period;
c) a site review;
d) a review of the SA for the individual sites; and,
e) a Site Prioritisation Assessment – considering the results of the SA for each site, together with a comparison on sites with regards to how each performs in relation to availability, viability and benefit to a wider town strategy.
When the review of the SA (at (d)) was carried out, it was important to ensure that a structured scoring methodology was followed to ensure a consistency in approach - this effort to ensure consistency was required because:

i. various planning policy officers were carrying out the site SAs; and,
ii. as the scores derived through the site SAs would contribute to a comparison of the sites (i.e. the site prioritisation assessment, at (e)), a consistency in scoring methodology was important.

A structured scoring methodology was developed, which applied to this and the Policy Formation Stage SA. The most recent scoring methodology is presented as Appendix 2. Whilst a comparison of the SA scores provided for each site contributed to prioritising sites, the SA scores were not the ultimate deciding factor when sites were chosen, as in many cases avoidance and mitigation measures enable potential negative effects to be limited. The result of this step was the final recommendation of sites for inclusion within Allocations DPD.

The SA tables from this stage of work are presented as part of the site selection process which is documented within the Housing and Employment Evidence Base Reports for each town (available at www.cornwall.gov.uk).
### Outputs from various work streams, such as...

- Environmental Assessment (including, historic, ecological, agricultural and landscape constraints)
- Accessibility Constraints/Opportunities
- Landscape Assessments
- Potential for sustainable energy
- Economic potential
- Design constraints
- Flood Risk Assessment
- Habitats Regulations Assessment

### Key SA Stages

- Options Stage SA\textsuperscript{17}
- Site Prioritisation Stage SA\textsuperscript{18}
- Final Policy Formation Stage\textsuperscript{19}

### Policy Development Stages

- Site Options
- Site Selection
- Site Allocations DPD Policy Wording

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\textsuperscript{17} Reported as part of TFP Background Papers (www.cornwall.gov.uk)

\textsuperscript{18} Presented as part of the site selection process which is documented within the Housing and Employment Evidence Base Reports for each town (available at www.cornwall.gov.uk)

\textsuperscript{19} Presented in Appendices 3-12 of this report, updating work undertaken during the preparation of the October 2016 consultation version of the Allocations DPD.
**Stage 3: Policy Formation Stage**

The initial version of the Allocations DPD was then drafted, taking into account the SA outputs up until this stage and also with a refresh of the SA of the proposed sites. This was released for consultation in October 2016, accompanied by an SA Report.

Following consultation on the initial version of the Allocations DPD, the policies presented in the Allocations DPD were updated to reflect consultation responses and updated evidence. This SA Report accompanies the updated version of the Allocations DPD.

Appendices 3-12 present the appraisal of the current site policies for each of the ten towns. They set out SA tables for each of the site policies which allocate land for new future development.

These SA tables summarise: the appraisal findings relating to the Site Policies; what mitigation measures and aspects to be considered have been highlighted; and how these considerations have been considered by Policy Planners (in the policy formation). This illustrates the iterative nature of the work; by carrying out the SA, the process has helped to form the policy wording for the site specific policies contained within the Allocations DPD. The summary scores within these SA tables were arrived at through following the scoring methodology set out in **Appendix 2**.

The thread of the SA through the site selection and policy development process is illustrated in Figure 1.

**Safeguarded Employment Sites**

It should be noted that the Allocations DPD also includes policies which ‘safeguard’ land for employment uses (B1, B2 and B8). These sites and policies have not been subject to a SA. This is because the policies will not result in a new land use in these locations but will instead ensure that existing land uses are protected. As such no change will happen on these sites as a direct result of the plan.

Throughout the SA process advice was sought from the Council’s in-house Sustainability and Climate Change Policy Officers and consistency with the approach of the SA for the LP:SP sought.

**8. Consideration of reasonable alternatives through the SA process**

A key element of the SA process has been the appraisal of ‘reasonable alternatives’ for the Allocations DPD. The SEA Regulations\(^\text{20}\) are not prescriptive as to what constitutes a reasonable alternative, stating only that the SA Report should present an appraisal of the ‘**plan and reasonable alternatives taking into account the objectives and geographical scope of the plan**’.

From the perspective of the overall spatial strategy for the Allocations DPD, this has been led by the provisions of the LP:SP. The LP:SP underwent a robust SA process which considered a range of reasonable alternatives in relation to the level, scale and

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\(^{20}\) Environmental Assessment of Plans and Programmes Regulations 2004
distribution of development in different locations in Cornwall. In this respect the overall spatial strategy for the Local Plan, which has led to ten towns being considered for site allocations through the Allocations DPD, has undergone a rigorous appraisal in relation to reasonable alternatives through the LP:SP.

The SA process for the Allocations DPD has provided further granularity to this process in relation to the ten towns considered. As described in Chapter 7, the SA process undertaken to date has undergone an iterative process which has sought to inform and influence the plan-making process and support the Allocation DPD’s contribution to sustainable development. This has considered alternative spatial strategies (or reasonable alternatives) for each town.

The potential spatial strategies considered for each town encompass a range of alternative approaches, including relating to:

- Broad locations for development around each town;
- Site options; and
- Site policy options.

The alternative options considered and appraised for each town, the appraisal findings and recommendations, and responses to these are presented in the Housing and Employment Evidence Base Reports (see Chapter 7) and Appendices 3-12 of this SA Report.

9. What are the appraisal findings and recommendations at this stage?

Appendices 3-12 set out the SA findings and recommendations by town. Each appendix presents tables setting out the SA findings in relation to each town’s:

- Vision and Objectives (as appropriate); and
- Site Allocation Policies.

The SA of Town Vision and Objectives

Appendices 3-12 present SA appraisal tables on how elements of the Vision and Objectives for each town are considered to support (or undermine) the SA Objectives21. Indicative summary scores (e.g. +, -) are included in the assessment tables to indicate to what extent the various towns’ Vision and Objectives support or undermine the SA Objectives. It should be noted that these indicative scores do not take into consideration any mitigation measures proposed as part of the SA.

The appraisal of the various towns’ Vision and Objectives highlighted that no significant concerns were raised in relation to SA considerations.

The SA of the Site Allocation Policies

For each Site Allocation Policy, an SA Table presents the following against each of the 19 SA themes:

- The anticipated impacts of the proposal;

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21 See Section 8
• Proposed mitigation measures and elements to consider; and
• How these elements have been taken into account by Policy Planners.

These are presented in **Appendices 3-12**, which, for each town, present the findings, mitigation measures, recommendations and subsequent responses by Policy Planners.

To support the summarisation of potential effects, a summary traffic light score has been provided for each site, reflecting the scoring presented below. The detailed scoring methodology for this process is presented in **Appendix 2**.

**Summary traffic light scores**

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<th>Description</th>
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<td>Likely to undermine the SA Objective</td>
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<td>Likely to support the SA Objective</td>
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<td>Likely to lead to a significant contribution towards meeting the SA Objective</td>
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<td>Objective/criteria not relevant</td>
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In this context, **Table 2** presents a summary of the appraisal scorings for each site proposed through the Allocations DPD.\(^{22}\)

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\(^{22}\)It should be noted that (as for the SA on the Vision and Objectives) the summary traffic light scores do not take into consideration any mitigation measures proposed as part of the SA.
Table 2: Summary of appraisal findings, in terms of whether the site policy contributes to or undermines meeting the SA Objectives.

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<th>Sites</th>
<th>Type of development</th>
<th>1 Climate Factors</th>
<th>2 Waste</th>
<th>3 Minerals &amp; Geodiversity</th>
<th>4 Soil</th>
<th>5 Air</th>
<th>6 Water</th>
<th>7 Biodiversity</th>
<th>8 Landscape</th>
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<th>11 Design</th>
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<th>13 Crime &amp; Anti Social Behaviour</th>
<th>14 Housing</th>
<th>15 Health, Sport &amp; Recreation</th>
<th>16 Economic Development, Regeneration &amp; Tourism</th>
<th>17 Education &amp; Skills</th>
<th>18 Transport &amp; Accessibility</th>
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Cumulative & Synergistic Effects

The SEA Regulations require that cumulative and synergistic effects are considered when identifying likely significant effects. These effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the DPD (e.g. noise, dust and visual) have a combined effect.

The approach taken has been to identify all cumulative and synergistic effects (often just referred to as ‘cumulative effects’) in terms of:

- Spatial
- Temporal
- Temporary / permanent
- Secondary and indirect

The SA Tables in Appendices 3-12 have considered how the different elements of the plan combine to affect the various environmental, social and economic elements identified in the sustainability objectives. However, it is also important to consider the effects of plan implementation combined with other plans. Neighbouring authorities have produced development plans and accompanying SAs and these documents have been reviewed at a high level to identify the areas where cumulative effects may arise. This work was carried out at the strategic level as part of the SA on the LP:SP (see Section 8.21 of the Planning Future Cornwall: Cornwall Local Plan Strategic Policies 2010 – 2030 Sustainability Appraisal, available at www.cornwall.gov.uk).

10. How have SA recommendations been taken into account?

The SA of the Allocations DPD has been carried out in parallel with the drafting of the Allocations DPD. Discussions took place with the Allocations DPD Manager, Town Framework managers and changes were incorporated into the text as it was written. The process followed is set out in Section 7 of this report, with the SA process directly informing the selection of site options.

The site SA Tables presented in Appendices 3-12 detail how the recommendations resulting from the SA at this latest stage in the process have been taken into account by policy planners.

11. Difficulties encountered & limitations

Changes to the sites and policies

Throughout the process, site boundaries have been subject to change and the SA Tables have needed refreshing. Whilst changes to site areas can make comparison between different stages of the SA sometimes difficult, an appropriate SA has been ensured at each SA stage.

Scoring

The SA Tables contain summary scores. For the SA on the sites, the Options Stage SAs were produced by various officers, which means there could be some minor variances in
the ways the SA objectives were interpreted; however it was ensured that the same officer dealt with all the SA work for a particular town, which ensured a consistent analysis between sites for that town.

**Limitation of the scope of the Allocations DPD**

On occasions the SA has indicated that policy proposals are likely to undermine the achieving of an SA Objective, for instance, the Soil SA Objective - it is recognised that building new development on greenfield land will inevitably undermine this SA objective, however there is limited opportunity for policies which allocate greenfield land for development to mitigate against this. Other aspects, for example proposals with a negative impact on the historic environment, will be mitigated against, not only through policies of the Allocations DPD, but also higher level policies (i.e. at the LP:SP and NPPF levels).

**Forward looking assumptions**

Certain statements made in this SA report that are not historical facts may constitute estimates, projections or other forward looking statements. Even though they are based on evidence and reasonable assumptions, due to their nature forward looking statements involve a degree of risk and uncertainty that may cause the actual results to differ materially to the results that have been predicted. Therefore any estimates or projections contained within the SA report cannot be guaranteed or warranted. The work represents the best take on the situation at the time of writing and was reviewed by more than one officer.

**Report formation**

A substantial amount of work around the SA has been carried out through the process of producing the Allocations DPD. Collating such a large quantity of information into a user friendly report and communicating all of the aspects work carried out has been challenging. The use of Site SA Tables (presented in Appendices 3-12) were determined to be the best approach - these collate the information on a site by site basis, allowing the document user to cut through the realms of information to SA information relating to precise policy proposals.

**12. How can we best monitor the plan’s impacts?**

Cornwall Council has taken on-board the SA recommendations for avoiding and mitigating against negative impacts and maximising positive outcomes and this will also be continued at the next stage in the process. However, it is still likely that some negative effects will occur as a result of the implementation of the DPD. As such, it is important that consideration is given to how effects can be monitored during the lifetime of the DPD.

Monitoring significant effects is a key requirement of the SEA Directive which states that “member states shall monitor the significant environmental effects of the implementation of plans and programme in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action” (Article 10.1). The Environmental Report shall include “a description of the measures envisaged concerning monitoring” (Annex I (i)).

The Council must prepare an Annual Monitoring report (AMR) setting out, amongst other things, the extent to which the policies set out in their Plan and DPDs are being achieved. These will be measured using contextual and output indicators and identifying targets. The Council has identified a proposed monitoring framework to measure the LP:SP, which is
shown in the Appendix of the SA report for the LP:SP. As part of the AMR process the Council will also monitor the significant effects of the Plan which have been identified through this SA process. The most effective way to monitor these identified significant effects has been discussed with the Council’s Monitoring Officers and a table of proposed Significant Effects Indicators is included in the appendix of the SA report for the LP:SP. The monitoring of the Plan encompasses the monitoring of the DPDs.

13. Next steps

This SA Report accompanies the current consultation on the Allocations DPD (March 2017).

Following this consultation, the Allocations DPD and accompanying information (including consultation responses and the SA Report) will subsequently be submitted by Cornwall Council to the Planning Inspectorate for Examination later in 2017.