

Final Submission for Examination Panel Reference Number 86
Roy Blewett for Penzance/Newlyn hearing 20th and 21st March 2018

Site allocations **PZ-H4, PZ-H5, PZ-H6, PZ-H7** and **PZ-H8** are all unsound due to the following reasons:

1 They are all on agricultural land Grade 2, except for one small area of **PZ-H4***. Agricultural Land if so developed would lead to the loss of the best and most versatile agricultural land.-- Which we will need in the future!

* Source; **Agricultural Land Classification Field Survey.**

The sites are set in open countryside which is against Council policy to be developed. and significant areas are either designated to an Open Area related to Settlements or are subject to Tree Preservation Orders and very narrow roads that cover this area

Conclusion on all sites above; these sites should now be subject to a more detailed urban and landscape analysis. Last update 27.12.2017

Penzance and Newlyn Housing Evidence Report: Environmental Assessment

PZ-H4 also has extensive views across the bay to St Michael's Mount and vice versa.

Lord St Levan would not take kindly to seeing more housing covering his view!

2 PZ-H5 Another reason for this site allocation not to be sound is that within its curtilage is Polmennor Garage that employs 2 personnel plus an apprentice and is intending to add another one to its workforce shortly. It provides a modern service complete with computer diagnostics. The Council's page on the allocated site states that partial development would not be allowed so is it the Council's intention to force these people out of a job and lose another 2,000sq feet of employment space to add to the 60,000 already lost in the area?

Proposed 38,000 new jobs in Cornwall, what, where, how and when?

3 All sites allocated are unsound as they will change the character and uniqueness of the village of Heamoor first recorded in 1274AD, by using up the Greenfield aspect and views across the area.

The sites allocated equate to a number of houses that will increase the village's existing 1200 housing stock by 53% which would obviously change its character.

4 PZ-H4, PZ-H5 & PZ-H8 sites have ancient footpaths across them, one a Churchway, and as these cross the centre of the allocated sites they will lose their character by completely being encompassed by housing and therefore be at risk of destruction as the children would use them as play areas.

5 All sites are unsound as the land is unsuitable for development due to 5.1 and 5.2

To quote Shaun Pritchard, Environment Agency, Technical Specialist in the West Penwith CNA discussion paper, date unknown:

“Penzance is one of the greatest areas of coastal change predicted by the Cornwall and Isles of Scilly Shoreline Management Plan, the plan suggests that a Coastal Change Management Area is established for Mounts Bay.”

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5.1 All sites allocated are unsound being in a **Critical Drainage Area** for which, when large developments are planned, there is a requirement for a Surface Water Management Plan before development. The plan we understand was to be from the Environment Agency via the Council as Lead Local Flood Authority.

The Plan has been requested by me on numerous occasions but I have now been informed at the first Heamoor Consultative Group meeting that none exists at present. The plan had to ensure that water run off levels were reduced thereby bettering what exists. The allocated sites all have springs in them, some quite large, and **PZ-H5** even has a chute on its boundary into Polmennor Road that runs all year long. SuDs alone on the sites in our **Critical Drainage Area** and with the rain we have been having would have to be so large as to be uneconomic. The Environment Agency informs us they have severe concerns on two areas, Wherrytown and Chyandour, both fed in one way or another from the allocated sites.

All the waters from the allocated sites will end up either in these places via the Chyandour Brook or Larrigan Brook, or enter the combined sewers which would be unable to take the flow if a 1 in 100 year event occurred, another risk.

At the moment (week 3 Jan 2018) there is around 20,400 litres a day leaving Trengwainton from the garden. The culverts below the garden that are now under council control cannot cope with the flow, causing a flood on Boscathnoe Lane on the 10.1.18. The rest of the water continues running through pipes onto **PZ-H8**, (On a map from Trengwainton 12.1.18). The water table is too high to permit house building safely here therefore the site is unsound.

5.2 All sites allocated are unsound as the Chyandour Brook through the centre of Heamoor is already a flood risk area with the village being flooded 3 times in the last 15 years by rains not considered to be a 1 in 100 year event, by allocating these sites *the cumulative risk* from all the sites is increased exponentially. A large area of the village would be seriously flooded again if a 1 in 100 year event happened. Cornwall has suffered two such events in 13 years, Boscastle 2004 and Coverack 2017. Climate change will only give us more.

6 The Heamoor roundabout onto the A30 is already a severe problem and would become nigh on impossible to access at peak times if the allocations were to go ahead. It is a cumulative effect that must be considered as each site cannot be taken in isolation. One must also take into consideration the huge increases in delivery and service traffic that would occur. Emergency vehicles would find it increasingly difficult if not impossible to access some properties in Heamoor, by being grid-locked on many occasions due to the excessive developments planned.

The Council's only mitigation action in the whole plan is to put traffic calming measures in Joseph's Lane. The proposed Bus gate at Boscathnoe will have no effect on the roundabout.

From the Council's poor record in obtaining grant funding and seemingly placing all its faith in Section 106 funding with new developments, not using the CIL route on developers it is felt that all the council can do is address the problems we have at present and attempt nothing new.

In a survey done back in 2014/15, at a minimum if the properties are built, 45% of them will have 1 car, 23% will have 2 cars 7% of houses will have 3 or more cars. Transport & Logistics Vehicle and Road Traffic Report from June 2014 to March 2015

The figures below, due to the survey being undertaken 3 years ago, must be treated as already far far less than a present day survey would show

Total Houses 720 proposed on all Heamoor Sites

PZ-H4 Trannack 290 @ 45% will have 1 car	= 130
290 @ 23% will have 2 cars	= 133
290 @ 7% will have 3 cars	= 61

Cars accessing the A30 at Treneere Roundabout = **324** in TOTAL

PZ-H5, PZ-H6, PZ-H7 & PZ-H8 Heamoor Sites

Balance 720-290 = 430 @ 45% will have 1 car	= 193
430 @ 23% will have 2 cars	= 198
430 @ 7% will have 3 cars	= 90

Cars accessing the A30 at Heamoor roundabout = **481** TOTAL

On top of this extra cars accessing the A30 at Heamoor roundabout from Penzance

Pz-H9 St Clare 130 @ 45% will have 1 car	= 59
130 @ 23% will have 2 cars	= 60
130 @ 7% will have 3 cars	= 27

Cars accessing the A30 at Heamoor roundabout **146** TOTAL

Total possible number of additional cars accessing the A30 at Heamoor roundabout 481 + 146 = 627

Within a distance of .5 of a mile the additional cars = 324 from Trannack

Minimum additional cars accessing the A30 within .5 mile = **951** in Total

The council thinks this will not be a problem?

It appears no assessment has been carried out on the adequacy and sustainability of the Heamoor Roundabout!

7 **Pollution:** This is the position now in Penzance, additional vehicles will just cause too much damage on the population and the area's amenities..

National Atmospheric Emissions Inventory NAEI (DEFRA)

Carbon Monoxide 2nd highest level at 60 to 160 t/1x1 Km

Nitrogen Oxides as NO₂ 2nd highest level at 1 to 25 t/1x1 Km

PM₁₀ (Particulate Matter < 10µm)

Central Penzance **highest level** Greater than 4 t/1x1 Km Surrounding
Penzance **2nd highest level** at 1 to 4 t/1x1 Km

PM_{2.5} (Particulate Matter < 2.5µm) Central PZ, Heamoor and
Newlyn **highest level** Greater than 4 t/1x1 Km Surrounding
PZ **2nd highest level** at 1 to 4 t/1x1 Km

Lead 2nd highest level at 0.1 to 1.5 Kg/1x1 Km

8 PZ-H8 All developments in West Penwith are likely to have some effect on the historic environment. The site is near the historic Trengwainton House and gardens and development would negatively affect the setting of and views from the house. Outcome of Historic Environment Assessment implies a potential for substantial harm to the historic environment, however this could be avoided or mitigated.**(HOW?)** - The site contains one feature recorded on the Cornwall Sites and Monuments Register, with evidence for a medieval settlement at Luthengwearne Farm. The site is classed as Anciently Enclosed Land. ***Penzance and Newlyn Housing Evidence Report: Sustainability Appraisal Tables at Step 13d. Last update 27.12.17***