

Full Name	Organisation Details	Comments	Cornwall Council Comments.
Cllr Ashley Wood	Chairman Lanner Parish Council	Water shortage is generally agreed to be the most dangerous threat to mankind: far more so than food shortages or energy shortages. Bearing in mind our history of water shortage issues and our doubling of population in the summer months, surely water security should be a key issue within the Core Strategy. Also, given the Core Strategy's commitment to local food production it must be realised that more crops are going to need to be produced by irrigation which will also need more use of energy.	Agree that this is an important issue for the Core Strategy and Infrastructure Development Plan. One of the SA objectives is 'To maintain and enhance water quality, reduce consumption and increase efficiency of water use' and this is likely to be addressed through design policy.

<p>Ms Gaynor Mamo</p>	<p>The Clerk St Blaise Town Council</p>	<p>St Blaise is an agglomeration of smaller communities (St Blazey, St Blazey Gate, Biscovey and others) that have, over time, expanded to the point where their separate physical boundaries are largely submerged. This continuing expansion now threatens to eradicate boundaries between St Blaise and neighbouring towns and parishes. The sense of community, once very strong, has already been somewhat diluted as a result of large-scale housing developments such as Manor View and the current Par Lane development. Not all of the housing stock is of a notably high standard. At the same time as large-scale housing development, the traditional employment opportunities in the immediate area (clay extraction and processing) have declined significantly, without any commensurate new opportunities. This has led not only to an increased level of unemployment in St Blaise, but has also served to aggravate the existing tendency for the town to become something of a dormitory for St Austell and, to a lesser extent, Bodmin. This serves neither the appetite of the residents (expressed in the 2010 Town Plan) for action to enhance the community spirit, nor the ambitions expressed so eloquently in Section 2 (Cornwall's Vision) of Cornwall Council's draft Core Strategy Paper: Self sufficient and resilient communities To make better places through quality building, using housing development to meet local need and drive the regeneration and sustainability of communities, promoting smaller settlements to be centres of employment and services and set an</p>	<p>Noted. These comments are on the Core Strategy itself, rather than on the Sustainability Appraisal. The Town Council has commented on the main document and these comments have been recorded.</p>
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		<p>example in design for sustainable living.' St Blaise has seen the construction of a significant number of dwellings in recent years. Current major developments (Par Lane - 150 houses) and those envisaged (Par Docks - some 500 homes) will add substantially to the housing stock. Notwithstanding assurances to the contrary, there is already strong local concern that the pace and scale of building is outstripping the capacity of already hard-pressed infrastructure. These concerns have in no way been allayed following the flooding in St Blaise at the end of 2010. The Vision The 2010 St Blaise Town Plan notes that some two-thirds of people support the building of new homes in St Blaise - but that the overwhelming view was that the majority of these should be affordable and for local people. There was a strong feeling that brownfield sites would be preferable to the uprooting of more green spaces. The concern expressed at the time the Town Plan was under preparation, that housing should not be sited on flood plains, will have been reinforced by last year's flooding. At the same time, the prevalent view was in favour of maintaining the existing green spaces, and if possible enhancing and expanding them. A clear majority felt that moderately higher (5 - 10%) building costs would be an acceptable premium for eco-friendly homes that cost less to run. In the light of the observations above, it would be perverse to argue against all future development in St Blaise: indeed this would run counter to the views expressed in the Town Plan. But it would appear that there is a case to be made for</p>	
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		<p>addressing any moderate to large scale development with the greatest of care, and specifically against the background of the vision in the Core Strategy Paper and the views recorded in the Town Plan. How Much and Where? The 'how much' is a particularly difficult question to answer in the case of St Blaise, because of the scale of previous development and the pronounced tendency of housing to be acquired by those working outside the town. In terms of the current needs of the existing population, the answer would be 'very little' - and the great majority of that to be affordable and for local people only. The precise numbers should be determined by demonstrated local need. What this town urgently needs is economic development of the sort that can help alter the 'dormitory' nature of current occupancy. Future home building should be firmly judged against that criterion. The 'where' also needs to be seen against the scale of recent developments. Residents have told us of their attachment to their existing green spaces. Moreover, it could be argued that the maintenance of some form of greenbelt between St Blaise and other nearby conurbations would help efforts to reinvigorate the sense of community spirit. We have also been told clearly of concerns about building on floodplains. There is something of a dichotomy here, since, Par Docks apart, much of the 'brownfield' land that might be used for development is on the floodplain. Perhaps a solution might be careful and selective use of land at risk from flooding for appropriate commercial</p>	
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		<p>development, with sensitive use of other areas for small scale housing development. At all costs, however, it will be essential: - first to ensure the retention, maintenance and if possible enhancement of as much public green space as possible; - second to take the greatest possible care to ensure that existing infrastructure (in particular - though not exclusively - in terms of drainage, etc) is significantly enhanced and that failsafe measures are introduced to ensure that run off from any newly developed sites will not aggravate the risk of flooding elsewhere; and - third that what is already at times a chronic and severe problem of traffic congestion is ameliorated rather than exacerbated. What? Although there is no specific 'what' question in the draft Core Strategy paper, it might be useful, in the context of St Blaise, to answer it anyway. In response to our questions relating to the Town Plan, our residents indicated a willingness to pay a modest premium in return for greener housing that was cheaper to run than much of the existing stock. This, taken together with the other views received, suggests that what is required for St Blaise is a small number of houses that are affordable, environmentally friendly to the highest standards, available for local people to acquire (for purchase or rent), and come either as part of a significant commercial development that can help generate local employment on a substantial scale or as stand alone live/work developments.</p>	
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M Calder	The National Trust	<p>The Sustainability Appraisal Interim Report focuses solely on the distribution options. A sustainability appraisal is also required for the level of growth options. The presentation of overall scores and combined scores in Table 1 of the Sustainability Appraisal (SA), fails to capture the relative importance of the individual criteria giving inadequate weight to those of most importance, such as climate change. The Dispersed Distribution Option (option 2) appears to score highest overall and the report concludes that it is the 'most sustainable' option (Executive Summary). However this option scores worst on climate factors where the Cornwall Towns option scores significantly better than either of the other two options. This criteria needs to be given a higher weighting in the decision making process if the primary thrust of the 'Future Cornwall' vision, of leading on the green agenda with a low carbon economy and promoting low carbon living, is to be realised.</p>	<p>An appraisal of the housing growth options has also been completed and is published as part of the evidence base. The Sustainability Appraisal has to address a variety of social, economic and environmental issues identified in the Scoping Report. These issues were developed and agreed by the council and its partners as the main decision making criteria. Equal weighting has been given to each section, but within those sections each element can be scored within a range, depending on their impacts. We agree that climate change is of great importance and this is reflected both in the scoring and in the assumptions document. However it is important to realise that at this stage the Sustainability Appraisal has been carried out on the basis that development will go ahead, hence the impacts scored are related to a comparison of the 3 different distribution options. The 'Future Cornwall' vision is wider than the green agenda – it recognises the importance of a wide range of issues (employment, transport, housing, cultural distinctiveness etc) and the sustainability appraisal reflects this.</p>
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Mrs Kaja Curry	Coastal Planning Coordinator Tamar Estuaries Consultative Forum	TECF concurs with the findings of the Appraisal which state that all three options will have the potential to impact on the marine environment particularly given the continuing high demand for waterfront development. TECF also recognises that even development at some distance from the marine environment can potentially impact on the sites and features of the European Marine Site. Indirect impacts are an issue and would for example include the increase of water based recreation arising as a result of the new housing and the resultant population increases. This would need to be addressed as part of the Habs Regs Assessment. Mention should be made of how the Habs Regs Assessment will be carried out for the Local Development Framework, and in particular when the known impacts from development on the sites and features of the Plymouth Sound and Tamar Estuary European Marine Site are assessed. The supporting Sustainability Scoping document needs to be revised to include more information on how Habs Regs Assessments will form part of the overall sustainability appraisal process. A rationale and suggested approach to doing this is provided in the Sustainability Appraisal of Plymouth City Council's Local Development Framework which was developed in partnership with the key parties who make up Tamar Estuaries Consultative Forum.	Noted. A Habitats Regulation Assessment Scoping report has been carried out and forms part of the evidence for development of the Core Strategy. Agree that future iterations of the sustainability appraisal can contain references to this document.
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Mr David Lobban	PCL Planning	<p>We believe the starting assumption for this Sustainability Assessment to be flawed and demonstrates a bias with regard to one of the key elements against which the proposed Core Strategy needs to be assessed. With regard to the assumptions, Section 1, Environment, states: "housing construction and occupation to meet population growth will have a negative impact on the environment." Whilst this statement may be true per se it would be equally true to state under social inclusion that failure to make adequate housing provision is socially unacceptable. In this regard we believe adequate housing provision to be housing for all and not necessarily just affordable housing. This is fully consistent with PPS3. We believe this starting point to be contrary to Government Guidance contained in PPS3 and that the failure to meet housing demand in Cornwall of an appropriate type for all sections of the community will also have a profound negative impact. We find there is little indication of the weighting to be selected or applied to the various assessment criteria. Whilst with regard to the history and nature of Cornwall and its communities we are generally supportive of a dispersed approach, we are not convinced that the assessment as presented wholeheartedly supports this conclusion. Nor are we of the view that such a blanket approach for Cornwall is the right approach, and we believe there are elements of all three scenarios that would provide the best mix for the County. (See commentary on Core Strategy).</p>	<p>It seems that the role of the assumptions document has been misinterpreted. The purpose of stating that housing population will have a negative impact on the environment is to accept this as a given and then perform an objective comparison of the three options, rather than to reject development.</p> <p>The assessment criteria are not weighted, but a range of scores can be given within each criterion to reflect the severity of impacts. The Sa scoping report was developed to ensure that a range of topics and impacts were tested, so that a balanced approach to environmental, economic and social issues is taken.</p> <p>Agree that a blanket approach for the whole of Cornwall is very unlikely to be the right approach.</p>
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Mr Ross Simmonds	English Heritage	<p>In our letter of June 2009, in response to the preparation of Cornwall's Local Development Framework, Sustainability Appraisal Draft Scoping Report, English Heritage raised a number of issues relating to understanding and identifying sustainability issues. Full analysis of the baseline information relating to the historic environment would help to identify these issues and this should be done in conjunction with local authority conservation and archaeological staff, together with other key stakeholders and local communities who will highlight issues concerning the wider historic environment. This will enable a fuller analysis of sustainability issues concerning the historic environment than stood at that time. The section on Sustainability Issues within the Historic Environment Section seemed lacking in analysis of why the points raised were issues. In reading the current interim report these points appear not to have been addressed. Assumptions These appear sketchy and general in nature. This does not provide English Heritage with the confidence that the options are being assessed against a credible evidence base.</p>	<p>These comments seem to relate to the Scoping Report which is the detailed evidence base which is used to carry out the sustainability appraisal. The Historic Environment section of the Scoping Report was written by local authority conservation staff and the whole report was developed in partnership with key stakeholders, including English Heritage, whose comments were incorporated at that time.</p>
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Nick Donaldson		<p>Transport and Accessibility: referring to table 1, the section 'Climate factors' states that Option 2:dispersed would lead to increased greenhouse gas emissions as there is no evidence that car travel would be reduced. This is not reflected in the positive score that Option 2:dispersed receives in the Transport and Accessibility sections where it suggests that over the longer term it is possible that communities could become more self reliant, for example under a peak oil scenario, with public transport, services and facilities becoming more viable. To ensure that Option 2:Dispersed is environmentally 'sustainable' in the long term, the Council must obtain a clearer understanding of these issues and how they are likely to play out in rural communities. If Option 2 is chosen, the Council must be responsible for ensuring that, faced with energy and resource scarcity in the future, villages/clusters are still able to be "self sufficient & resilient communities".</p>	<p>Agree. The sustainability appraisal must identify and make explicit both short and longer term effects. The council is currently reviewing the 'Smaller Settlements' study and carrying out further exploratory work in the 'rural frameworks' study.</p>
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Mr Mervyn Mitchell		As the Executive Summary effectively states: this is an extremely simplistic evaluation and is too subjective in its methodology to be a reasonable tool for making major decisions. I suggest that this report should not be used in its present form and discarded until a more scientific analysis with a fuller evaluation takes place.	It should be noted that this is not the final Sustainability Appraisal of the Core Strategy. The document is explicit that this is a very early stage of appraisal work. This is a strategic appraisal of spatial growth using broad assumptions. At this early stage the appraisal can only reflect the amount of detail in the main document. Sustainability appraisal is an ongoing process and will evolve alongside the production of the plan.
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Mr Andrew McDouall	Consultation Service Natural England	<p>Comparison of Housing Distribution Options The sustainability appraisal as set out in Table 1 appears to be weak, lacking in clarity, logic and robustness. The comments under the Cornwall Towns, Dispersed, and Economy Led headings are a very poor and sloppy substitute for scoring each Sustainability Criterion in the left hand column according to the criteria set out in Table 2 at the end of the section Sustainability Appraisal Decision Making Criteria. For example, under the heading Waste, the Sustainability Criterion 1d Will it reduce the waste management industry's contribution to climate change?' is not addressed despite the fact that the distribution of development is likely to have a significant influence of the collection and transportation of waste and recyclables. Similarly for Waste 1b Will it increase levels of composting or anaerobic digestion?' the economy of scale arising from the distribution of development could be a factor in determining the viability of composting schemes and anaerobic digestion. Therefore, we very strongly recommend that the sustainability appraisal of the options paper is re-worked so that each Sustainability Criterion in the left hand column is scored according to the criteria set out in Table 2 at the end of the section Sustainability Appraisal Decision Making Criteria. This is an essential minimum requirement to ensure that the conclusions of the sustainability appraisal are clear, transparent, logical and robust.</p>	<p>This is contrary to the advice of our critical friend. At this stage we were advised to make a strategic analysis of the three options as the document does not contain enough detail to score against each of the sustainability criterion. This is an early stage of sustainability appraisal and further detailed work will follow.</p>
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Mr Andrew McDouall	Consultation Service Natural England	It is very difficult to see how the conclusions reached in this section have been derived from Table 1 in the preceding section. This table needs to be reworked in order for Cornwall Council to be able to demonstrate that the conclusions of the sustainability appraisal are accurate, reasonable and defensible.	Noted: however the approach suggested by our critical friend was to focus on bigger issues and provide a general strategic appraisal, at this stage.
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Miss Rose Freeman	Theatres Trust	<p>Sport and recreation are given great emphasis in this section but there are other elements in the building of sustainable communities. Involvement in cultural and leisure activities will also have positive benefits in terms of overall health and well-being as well as providing the opportunity to develop new skills. Arts, sport and leisure can be vehicles for health promotion; libraries, museums and the creative arts can contribute to education; parks, town centre cultural activities and public art can play a role in urban regeneration. Each service has its specific strengths, but all can make some contribution to combating social exclusion and developing communities. Activities such as attending a theatre performance are just as important for the well-being of residents and visitors. Art participation is an important leisure pursuit for adults and should also be encouraged for young people. There are benefits not only to an individual but also to the community. Communities that are committed to providing opportunities for experiencing art are considered more livable because they are attractive to businesses and industry and they offer a higher quality of life for residents. Tourism is also strongly linked to art where arts activities are believed to stimulate tourism in a community, and vice versa.</p>	<p>We accept these comments. The Social Inclusion refers to community facilities but cultural facilities are not specifically referenced, whereas sports facilities are. We will ensure that cultural facilities and opportunities are also explicitly considered. However it should be noted that the Core Strategy is looking at broad housing levels and distribution at this stage.</p>
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Miss Rose Freeman	Theatres Trust	<p>We do not see any engagement with the sustainability of venues and facilities for cultural activities which would affect town centre vitality and tourist attractions. A key element of sustainable development is to strike the right balance between the ability to serve economic development and the ability to protect the environment and sustain future quality of life. Your theatres are an important community asset, providing jobs, skills, learning and educational opportunities, and offer vital secondary spend to tourism, retail and leisure sectors. This document should aim to support the continued success of existing venues and encourage new spaces for theatre within community centres and schools throughout the community, as well as in the town centres. We encourage the Council therefore to broaden the contents of the document to include a greater understanding of the economic growth issues for cultural activities and the arts.</p>	Noted and agree, as above.
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Mr James Evans	Cornwall Development Company	We have a number of concerns with the ~assumptions' made in the SA document and how these have been transposed into the conclusions outlined at the end of the main Core Strategy document. In particular we do not agree with the following comments highlighted in italics and we have provided brief bullet point responses. We are more than happy to provide further information and to assist with the development of the SA: [see comments on individual areas]	Noted.
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<p>Mr James Evans</p>	<p>Cornwall Development Company</p>	<p>1.5 Air: economy led option is fossil fuel dependent. The economy-led option doesn't mean anything goes, anywhere. Whatever dispersal option is chosen, economic and sustainable development will form an integral part of it. By creating the right environment for the economy to grow and to encourage better opportunities for Cornwall there is potentially more opportunity to 'green' the economy - not all economic development is fossil fuel dependent.</p>	<p>Agreed – the economy led option is not the most dispersed option proposed. However it is the only option which specifically mentions development at the airport and a focus on development along the A30 – these developments are potentially linked to fossil fuel dependent modes of transport, because of their location, not because of their economic nature.</p>
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<p>Mr James Evans</p>	<p>Cornwall Development Company</p>	<p>1.8 Landscape: the economy led option could have significant impacts on the landscape and visual character of Cornwall due to assumption that it will be along strategic transport routes. This comment appears to distinguish the economy led and dispersed options as resulting in a more significant adverse impact on Cornwall's landscape than the town's option. It implies that the economy led option is detrimental to landscape character on the basis that it is focused on strategic transport routes. In our view landscape impact will be relatively similar with whatever dispersal option. Development is not necessarily adverse to landscape character, the economy led option doesn't necessarily mean ribbon development along strategic transport routes and such routes are not the only location where you can view the landscape.</p>	<p>Comments noted. The role of the SA is to highlight potential adverse impacts and it identifies that the dispersed and economic distribution options have the potential to have more impact on the landscape. The role of the SA is to make this explicit so that these impacts can be avoided and mitigated if these distribution options are chosen.</p>
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Mr James Evans	Cornwall Development Company	1.10 Dispersed distribution will have a wider visual impact on the look of Visual impact can be positive - for example good quality design, regeneration/ restoration and through developing redundant sites. the historic environment of the County than the Cornwall town's option. The economy led option could have significant impacts on the historic environment of Cornwall due to assumption that it will be along strategic transport routes.	Noted, as above.
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Mr James Evans

Cornwall Development
Company

2.2 Crime and anti-social behaviour: increased transport links in particular the airport are likely to support development of the night time economy which is linked to crime and anti social behaviour Is this comment supported by any evidence? We would imagine crime and anti-social behaviour is principally impacted upon by poor design principles. We express concerns as to why the airport has been singled out in this case. This comment implies a direct link between the airport and the night- time economy in Newquay - we consider this 'assumption' to be damaging and should be removed if not supported by evidence.

The airport is only specifically mentioned in the Economy led distribution and therefore its role is commented on in the sustainability appraisal under this section.

Evidence from websites and marketing literature makes a direct link between Newquay airport and the night time economy. Police reports make a direct link between the night time economy and crime.

Mr James Evans	Cornwall Development Company	<p>3 Increased growth should provide, maintain or enhance a range of infrastructure including essential and non essential services This is reliant on development being viable. Development that is market - led is most likely to deliver the more financially viable options which ultimately provide the better opportunities to deliver non-essential services as outlined about. Smaller sites generally have reduced economies of scale.</p>	Agree.
Mr James Evans	Cornwall Development Company	<p>3.1 Economic development which is based on fossil fuels is likely to be vulnerable to the impacts of increased energy prices (recently forecasted by the International Energy Agency) in the long term It is assumed that tourists are attracted by the rural and natural environment which may be compromised through development in rural areas and adjacent to strategic transport routes. See responses to 1.5 and 1.8.</p>	Noted – see responses above.

Mr James Evans

Cornwall Development
Company

3.2 Education and skills: All development will provide new and or enhanced education facilities. Skills provided by education facilities need to be relevant to future need.
A prosperous economy is more effective in supporting skill/ education development. It is essential that skills development is acknowledged as more than knowledge economy - for example, advanced engineering, marine, food and drink, creative industries, etc. enhanced education facilities.

Noted.

Mr James Evans

Cornwall Development
Company

There are a number of further comments/ assumptions in this table which we simply do not agree with. For example, 'the economy led option is less likely to deliver affordable housing'. We consider the opposite to be the likely case; if sites are developed where economic development is more viable, then this increases development viability and increases the opportunity to provide more affordable housing. We do not agree with the conclusion that the dispersed option is the best option 'to support a balanced and low carbon economy that meets the needs of the area and promotes a diverse range of quality employment opportunities'. You can force economic development to go to a set location but you cannot force the business to stay open - the best option for successful and viable economic development is for it to be market led.

This is misquoted. The actual statement is that the economy led option is less likely to provide affordable housing in specific areas of need, because it will focus on economic growth opportunities rather than on housing need areas.

Other comments are noted.

Mr Michael Simpson

We refer particularly to the sections on Health, Sports and Recreation. Whilst we agree with the Sustainability Criteria shown under the various headings relating to the above matters we do not believe that in the Summary Conclusions enough emphasis is placed on the retention and creation of open spaces and sport and recreation areas. The question of access to the countryside and coast for recreation purposes is referred to and this is important. However no emphasis is given to the retention and creation of open spaces and sport and recreation areas within the various towns and villages. This is particularly important in villages to avoid the necessity for residents of the villages having to travel from villages to towns to use their recreation facilities. As stated in the planning objectives of PPG17 'opens spaces within rural settlements and accessibility to local sports and recreational facilities contribute to the quality of life and well being of people who live in rural areas' We also draw your attention to the inclusion within the planning objectives set out under the above PPG17 the further comments relation to the importance of open spaces, sports and recreational facilities in the promotion of social inclusion, community cohesion and the health and well being of the members of local communities. This includes the social development of children of all ages through play, sporting activities and interaction with others. In the village of St Issey we only have one area of open space that is available for public use for sport and recreation purposes at all times. This area is the

We note and agree the importance of open space and recreation areas. These comments relate more to the future policy content of the Core Strategy than the Sustainability Appraisal.

recreation ground in the centre of the village together with the children's playground that is adjacent to it. The area is flat, safe and secure for children and easily accessible, including disabled access. It is vitally important that this area is protected for the continued use of members of the community. The importance to the community of the retention of the recreation ground and children's playground in St Issey is evident by the support given by the Parish Council, ourselves, members of the community and in the Parish Appraisal 2002 and Parish Plan 2010 (copies attached) We shall therefore be grateful if you will be kind enough to ensure that protection for our area of open space for sport and recreation is incorporated within the Local Development Framework being prepared by you.

