

Strategic Environmental Assessment for the Redruth Neighbourhood Plan

Environmental Report to accompany the Regulation 14 version of the Neighbourhood Plan

Redruth Neighbourhood Plan Steering Group

November 2023

Quality information

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Non-Technical Summary

What is Strategic Environmental Assessment?

SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA for the Redruth Neighbourhood Plan seeks to maximise the emerging plan's contribution to sustainable development.

Two key procedural requirements of the SEA Regulations are that:

- When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
- ii. A report (the 'Environmental Report') is published for consultation alongside the draft plan (i.e., the draft Redruth Neighbourhood Plan) that presents outcomes from the environmental assessment (i.e., discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

What is the Redruth Neighbourhood Plan?

The Redruth Neighbourhood Plan (hereafter referred to as "the RNP") is being prepared under the Localism Act 2011¹ and the Neighbourhood Planning (General) Regulations 2012², and in the context of the Cornwall Local Plan 2010-2030³.

The vision of the RNP is set out across three core values; all future decisions taken for Redruth (including planning decisions) should be taken in line with the core values, which are:

- Core Value 1: Distinctively Cornish "This is authentic Cornwall. We're independent without being exclusive and everyone is welcome to be part of our diverse Cornish culture. We're working to develop into an affordable, modern, creative, progressive Cornish town that works for everyone."
- Core Value 2: Resourceful and Regeneration "We're embracing a repurposed economy. We want to be known as a place that's leading the charge for a more sustainable and equal society, where a groundswell of grassroots actions is already driving positive change. We're resilient, adaptable and are working to create our own solutions to society's big issues."
- Core Value 3: Sparking Ideas "Redruth has a history of being the heart of stories in Cornwall; a spark of change with the potential to be as revolutionary as the spark that lit William Murdoch's first gas lamp. Our communities are ready for innovation and progress, where our ambitious young voices help to drive purposeful change."

¹ UK Government (2011) 'Localism Act 2011)' can be accessed here.

² UK Government (2012) 'The Neighbourhood Planning (General) Regulations 2012' can be accessed <u>here.</u>

³ Cornwall Council (2016) 'Cornwall Local Plan 2010-2030' can be accessed here.

Purpose of this Environmental Report

This Environmental Report, which accompanies the Regulation 14 version of the RNP, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (December 2020), which included information about the neighbourhood area's environment and community.

The purpose of this Environmental Report is to:

- Identify, describe, and evaluate the likely significant effects of the RNP and alternatives.
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the RNP and its relationship with other relevant policies, plans and programmes.
- Relevant aspects of the current and future state of the environment and key sustainability issues for the area.
- The SEA Framework of objectives against which the RNP has been assessed.
- The appraisal of alternative approaches for the RNP.
- The likely significant effects of the RNP.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the RNP.
- The next steps for the RNP and accompanying SEA process.

Consideration of reasonable alternatives for the Redruth Neighbourhood Plan

Top-down considerations (e.g., strategic factors)

The Cornwall Local Plan identifies a requirement for 5,200 new dwellings across the wider Camborne, Pool, Illogan & Redruth Community Network Area (CNA).

Prepared on behalf of the Steering Group, the Housing Needs Assessment (HNA) has worked in collaboration with Cornwall Council to determine a proportioned figure for Redruth. This is given that the CNA includes settlements which are outside of the neighbourhood area. In this respect, a total of 1,960 dwellings out of the 5,200 for the CNA are to be delivered within the neighbourhood area. Deducting completions (up to the end of March 2020) reduces the total to a residual requirement for 1,178 additional homes between 2019-2030 (or 1,038 dwellings from 2020 to 2030, as highlighted within the latest draft version of the Neighbourhood Plan).

Reflecting the HNA findings, this should ideally include: 334 care homes; 305 specialist housing for disability or health related challenges; and 539 open market housing (including 25% affordable homes).

However, reflecting the number of approved permissions up to the end of March 2020 (596 homes), outline permissions by the end of March 2020 (383 homes,

including Tolgus Urban Extension), decisions which are pending at present (30 homes), and pre-applications (34 homes), the overall total comes to 1,965 homes. Given that this number would slightly exceed the housing target of 1,960 homes, Redruth is on track to meet housing requirements (in terms of the total number of new homes).

In this respect, the RNP does not seek to allocate land for development. Therefore, reasonable alternative approaches for the level and distribution of growth have not been explored through the SEA. These elements were considered for the Sustainability Appraisal (SA) for the Cornwall Local Plan.

Bottom-up considerations (e.g., site availability)

Whilst the RNP does not need to allocate land for development within the neighbourhood area, the Steering Group has explored a range of planning issues and considerations for the RNP relating to its vision and aspirations (as presented in **Chapter 2** within the main body of the Environmental Report).

For example, as the HNA identifies the need for specific housing types and tenures within the neighbourhood area, the Steering Group were keen to consider whether there were any opportunity sites which could be brought forward as allocations through the Neighbourhood Plan which would:

- Meet specific needs of the community; and/or
- Positively contribute to the vision/objectives for the neighbourhood area.

Two opportunity sites were identified in this respect, specifically: Brewery Site; and Fairmeadow Car Park.

In light of this, the SEA process has undertaken appraisals of high-level approaches and alternatives (hereafter referred to as "options") which are currently being evaluated as part of plan development. This is for the benefit of plan-makers tasked with selecting preferred policy approaches for the RNP and to highlight to consultees the relative sustainability merits of the different approaches that can be taken relating to the key elements of the Plan.

Consideration of opportunity sites through the SEA

Brewery Site

To support the consideration of the suitability of the Brewery Site for a potential allocation of a type appropriate for the RNP, the SEA has appraised the key constraints and opportunities present at the site.

The site has been considered in relation to the SEA Framework of objectives and decision-making questions developed during SEA scoping and the baseline information.

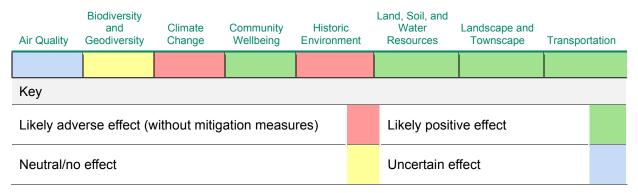
The full assessment findings are presented in **Table 4.1** in the main body of the Environmental Report.

A summary of the findings is presented below in **Table NTS1**. This provides an indication of how the site has performed in relation to each of the SEA themes, with the colouring as follows:

Green: likely positive effects resulting from an allocation at this location.

- Yellow: likely to be limited or no effects resulting from an allocation at this location.
- **Blue:** likely to be uncertain effects resulting from an allocation at this location (i.e., there are constraints, but the effects are perhaps dependent or influenced on the design and mitigation measures which could brought forward as part of a proposal).
- Red: likely negative effects resulting from an allocation at this location.

Table NTS1: Summary of assessment findings for the Brewery Site



The appraisal findings highlight that 'uncertain effects' and 'likely negative effects' are likely under one or more SEA themes, particularly in relation to climate change and the historic environment. Proposals for the redevelopment of the Brewery Site will need to demonstrate how the concerns and constraints to development at this location will be appropriate addressed.

In the context of the above, the draft plan appraisal findings (i.e., the next stage of the SEA), has considered the extent to which the emerging RNP policies and proposals address any constraints at this location, including with respect to mitigation and enhancement measures. The draft plan appraisal findings are presented in **Chapter 5** in the main body of the Environmental Report.

Fairmeadow Car Park

Fairmeadow Car Park is allocated for retail uses through the Cornwall Local Plan. However, since the adoption of the Cornwall Local Plan in 2016, it is recognised that there is a renewed focus on town centre regeneration through emerging national policy drivers (e.g., the Levelling-up and Regeneration Bill).

The recently regenerated Buttermarket is located adjacent to Fairmeadow Car Park and is set to reopen in Spring 2024. The revitalised Buttermarket "will provide small specialist shops, affordable workspace, open-air markets, entertainment and a range of small food and drink outlets, helping to revive the town's daytime and evening economy".⁴ Additionally, results from a local car park study indicate that Fairmeadow Car Park is currently underutilised, with a maximum 22% occupancy rate on weekends.

In the context of the above, the relative sustainability merits of exploring alternative uses for Fairmeadow Car Park has been explored. The following options have been considered through the SEA:

⁴ Redruth Revival (2023): <u>The Buttermarket History</u>

- Option A: Focus on retail uses at Fairmeadow Car Park (aligning with existing local policy).
- **Option B:** Support a range of uses at Fairmeadow Car Park with a wider focus on town centre regeneration (aligning with emerging national policy drivers).

The options have been assessed against the SEA Framework developed during scoping and presented against the SEA themes.

For each SEA theme an assessment of the likely significant effects of the options is presented. This is accompanied by a ranking of the options, which provides an indication of the relative sustainability performance of the options relating to the SEA theme being considered.

Table 4.2 to **Table 4.9** within the main body of the Environmental Report present the full findings of the appraisal of the options for each of the SEA themes. A summary of the findings is presented below in **Table NTS2** and supporting text.

Table NTS2: Summary of rankings by SEA theme

| SEA theme | Option A | Option B |
|---------------------------------|----------|----------|
| Air quality | =1 | =1 |
| Biodiversity and geodiversity | 2 | 1 |
| Climate change and flood risk | 2 | 1 |
| Community wellbeing | 2 | 1 |
| Historic environment | 2 | 1 |
| Land, soil, and water resources | =1 | =1 |
| Landscape and townscape | 2 | 1 |
| Transportation | =1 | =1 |

Both options would encourage redevelopment of a site within the Camborne, Pool and Redruth AQMA. Redevelopment of the site could encourage greater numbers of vehicles travelling through Redruth and increase vehicle idling – both of which will impact on local air quality through increased emissions and pollutants being released. However, both options could incorporate parking provision and mitigation measures to improve local air quality. This could include green infrastructure to absorb pollutants. As parking provision and mitigation strategies are dependent on the adopted scheme, both options are concluded to perform similarly.

In terms of potential effects on local biodiversity and/or geodiversity, the significance is largely dependent on the design and layout of the adopted scheme. This includes the incorporation of enhancement measures such as green infrastructure, which will contribute to biodiversity connectivity in the area. However, Option B has the potential to bring forward a greater level of enhancement. This is due to promoting a range of development, which is more in line with Cornwall Local Plan policies linked to green infrastructure.

Both options seek to bring forward development in an accessible location in terms of sustainable and active transportation, and on a site that is at low risk of fluvial flooding and no risk of surface water flooding. However, Option B is concluded to be more favourable than Option A due to promoting a range of uses on the site, which supports the Cornwall Council Climate Emergency DPD. A diversification of uses in

the town centre will help the community reduce the need to travel to access key infrastructure, which will help to lower CO₂ emissions linked to transport. Additionally, a more diverse development has a greater potential to contribute to natural environment enhancements and promote sustainable and active transportation. It is noted that the significance of effects through either option is dependent on the design of the scheme.

Whilst development through Option A or Option B will likely facilitate opportunities for additional community infrastructure, Option B has the potential to bring forward a wider range of opportunities. This reflects the promotion of mixed-use development under this option. Furthermore, mixed use development through Option B is also more likely to compliment the redevelopment of the Redruth Buttermarket to the east. This includes through enhancing connectivity to promote accessibility to the site, and green infrastructure provision to enhance the repairs being undertaken. It is noted these enhancements are dependent on the design of the scheme taken forward. Mixed use development under Option B could also support urban regeneration projects being undertaken by Cornwall Council, and has the potential to bring forward a greater level of public realm enhancement than Option A. Given this, Option B is more favourable for community wellbeing.

Option B is also concluded to be more favourable for the historic environment. The site is within the Cornwall and West Devon Mining Landscape WHS and the Redruth Conservation Area, and in proximity to 21 nationally designated listed buildings. Whilst development of the site through either option has the potential to impact on the integrity of these designations, Option B may facilitate opportunities for proposals that support Redruth's heritage. This is due to its focus on mixed use development, which could incorporate open spaces or public realm improvements, which will positively contribute to the setting of these historic environment designations. It is noted that development through either option should be accompanied by a proportionate heritage assessment to provide further details about the heritage significance and sensitivities of the site and outline potential mitigation measures.

Both options seek to bring forward development on a currently developed brownfield site that is located in the Redruth town centre. As such, both options promote the best use of available land. Whilst it is acknowledged the site is in proximity to the Poltreath Stream waterbody, it is uncertain whether redevelopment will affect this feature, as it is possible it flows underground in this part of Redruth. Both options have the potential to facilitate public realm improvements and green infrastructure enhancements, which would contribute to the land, soil, and water quality. However, this is dependent on the design scheme taken forward. As such, it is uncertain whether Option B would perform more favourably than Option A.

In terms of landscape and townscape, it is likely Option B will perform more favourably. Whilst both options focus on regenerating a site and could bring forward benefits to the surrounding townscape (for example, through incorporating materials and design features which complement the surrounding development / areas), Option B could bring forward greater benefits due to encouraging a mix of uses. This option could support a greater variety in building structures and public realm improvements, which can be more visually appealing. However, it is acknowledged that the landscape and townscape benefits of development will be dependent upon the design of the scheme.

Both options perform similarly in terms of transportation. The site is currently a car park that is underutilised – as such, redevelopment is unlikely to significantly impact

upon parking provision in the Redruth town centre. Additionally, the site would allow for walking and cycling opportunities through pavement provision and is in proximity to the public transport network. As such, significant increases in traffic movements through either option are unlikely. Given this, the options cannot be differentiated between.

On balance, Option B, through encouraging a range of uses at Fairmeadow Car Park, may help to enable the 'win-win- opportunities associated with the effective planning of key areas within the town centre environment to be realised.

Developing the preferred approach

The RNP does not allocate sites for development due to meeting its housing target through existing commitments and completions, and via strategic allocations within the Site Allocations DPD. However, the SEA has explored the relative sustainability merits associated with two opportunity sites within the neighbourhood area to inform key policy approaches for the RNP.

The preferred approach for the opportunity sites has been informed by the various surveys and evidence base documents prepared to support the RNP (to date), responses from community consultation events, and the SEA findings.

The RNP supports the principle of redeveloping the Brewery Site. Establishing a preferred development option for the site will be informed by the ongoing masterplanning work which is being completed by Cornwall Council.

At Fairmeadow Car Park, the RNP seeks to encourage a range of uses to support opportunities for town centre regeneration (**Option B**). It is anticipated that this will help to enable the 'win-win' opportunities associated with the effective planning of key areas within the neighbourhood area to be realised. Contributing factors include the changing nature of town centres in response to the pandemic, and complementing the proposed uses and regeneration of the Buttermarket which is adjacent to the Car Park. Although the site is currently safeguarded for retail uses within the Cornwall Local Plan, engagement with Cornwall Council has highlighted support for expanding the range of acceptable uses at this location.

Appraisal of the Regulation 14 version of the Redruth Neighbourhood Plan

The Regulation 14 version of the RNP presents 26 planning policies for guiding development in the neighbourhood area. These were developed following extensive community consultation and evidence gathering.

Chapter 5 within the main body of the Environmental Report presents the findings of the appraisal of the Regulation 14 version of the RNP. Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the Environmental Report presents the findings of the assessment as a commentary of effects under the SEA themes.

A summary of the appraisal findings is presented below.

Air quality

Overall, given both opportunity sites are located within / within proximity to the town centre, accessible to services, facilities and amenities and public transport infrastructure via walking and cycling, they perform favourably. However, as the sites are within the boundaries of the Camborne, Pool and Redruth AQMA, air quality impacts will be dependent on the design of the schemes which come forward at these locations (e.g., the incorporation of green infrastructure enhancements or opportunities to enhance active travel). **Uncertain effects** are anticipated with respect to the air quality theme at this stage.

Biodiversity and geodiversity

Given the proximity of the neighbourhood area to internationally and nationally designated sites for biodiversity and geodiversity, a Habitats Regulation Assessment (HRA)⁵ process has been completed for the Neighbourhood Plan. Providing any recommendations within the HRA are incorporated into the submission version of the RNP, it is anticipated that there would be no adverse effects to the integrity of these sites, either alone or in-combination with other plans and projects.

The opportunity sites – with the exception of the area of deciduous woodland near the Brewery Site – locate development away from designated sites and habitats and perform favourably in this respect. Recognising that higher level policy provisions will also provide protection, **no significant effects** are predicted at this stage.

Climate change

Whilst the identified opportunity sites are located within the built-up area of Redruth, within / near the town centre, the Brewery Site is currently disconnected from the town centre (in terms of pedestrian connectivity) and has significant flood risk issues. Nevertheless, the policy framework of the RNP supplement and reinforce the policies within the Climate Emergency DPD, which support sustainable development and mitigation measures for flooding.

On balance, given the use of the Brewery Site is unknown at this stage (informed by the ongoing masterplanning work by Cornwall Council to establish a preferred development option), **uncertainty** is noted with regards to implications on climate change.

Community wellbeing

The housing allocation for the neighbourhood area has already been met through a combination of existing completions and commitments (i.e., sites which have already been developed, or sites which already have planning approval but have not yet come forward), and through strategic site allocations within the Site Allocations DPD. In this respect, the RNP does not allocate sites for development.

Nonetheless, there is a strong focus through the RNP on ensuring that new development areas deliver high-quality and sustainable designs which respect the unique character of the neighbourhood area. Additionally, there is a strong focus on regeneration, supporting proposals to improve the economic and community vitality of Redruth. For example, it is recognised there are opportunities for brownfield and

⁵ AECOM (2023) – HRA Report' The HRA contributes to the evidence base for the Neighbourhood Development Plan, available to view alongside the additional Regulation 14 consultation documents.

regeneration development in the neighbourhood area, recognised by the identification of opportunity sites at Fairmeadow Car Park and the Brewery Site.

Whilst the preferred development option for Brewery Site in unknown at this stage, it is anticipated that the constraints and opportunities for the site will be appropriately reflected through the ongoing masterplanning work which is being completed by Cornwall Council. As the RNP recognises that supports a range of uses at Fairmeadow Car Park, this will benefit the local community and economy (complementing the redevelopment of the Buttermarket).

The policy framework also addresses a broad range of topics of relevance to community wellbeing, including housing; retail; employment; health; and local amenities, such as public open / green space and recreational facilities. On balance, **major significant positive effects** are still considered likely as a result of the policies and proposals within the RNP.

Landscape and townscape

Policies and proposals within the RNP are not considered likely to lead to any adverse impacts on landscape or townscape character. Sensitive redevelopment and regeneration of the opportunity sites is likely to avoid adverse effects on local views and amenity. The wider policy framework also performs positively in this respect, setting plan area wide guidance for future development to ensure proposals complement the existing town centre, and protect local green spaces. In light of these considerations, **minor positive significant effects** are anticipated for this SEA theme.

Historic environment

Whilst the opportunity sites are in historically sensitive locations, it is recognised that regeneration and redevelopment of the sites has the potential for mixed effects on heritage assets and areas. For example, as the opportunity sites are currently underutilised areas of brownfield land, the design of new development areas presents an opportunity to improve the setting of nearby heritage assets and conservation areas, and reinforce the significance of the WHS. Nevertheless, this is largely dependent on the design and layout of development, which is currently unknown. Whilst the policy framework seeks to protect heritage assets and the wider historic environment, taking a precautionary approach, uncertainty is concluded at this stage.

Land, soil, and water resources

The RNP identifies two opportunity sites which are supported in principle for redevelopment, at Fairmeadow Car Park and the Brewery Site. As both sites are areas of brownfield land, regeneration of these areas will support the most efficient reuse of previously developed land within the neighbourhood area.

However, given the former uses on the sites (particularly the Brewery Site), it is possible that these areas may contain areas of contaminated land which may reduce the viability of bringing these sites forward. Additionally, the regeneration of the Brewery Site should consider the potential impacts to the Portreath Stream which passes through the site boundary. It is anticipated that these factors will be considered in the ongoing masterplanning work for the Brewery Site which is being completed by Cornwall Council.

No significant impacts are anticipated for the SEA theme at this stage.

Transportation

Overall, the policies within the RNP work to improve transportation and movement in the neighbourhood area, by implementing policies that support active travel and public transport use. **Minor positive effects** are anticipated with respect to the transportation theme.

Next steps

Plan finalisation

This Environmental Report accompanies the RNP for Regulation 14 consultation. Following consultation, any representations made will be considered by the Steering Group, and the RNP and Environmental Report will be updated as necessary. The updated and final version of the Environmental Report will then accompany the RNP for submission to the local authority, Cornwall Council, for subsequent Independent Examination.

At Independent Examination, the RNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.

If the Independent Examination is favourable, the RNP will be subject to a referendum, organised by Cornwall Council. If more than 50% of those who vote agree with the RNP, then it will be 'made'. Once made, the RNP will become part of the Development Plan for the town.

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 RNP to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the RNP 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 RNP that would warrant more stringent monitoring over and above that already undertaken by Cornwall Council.

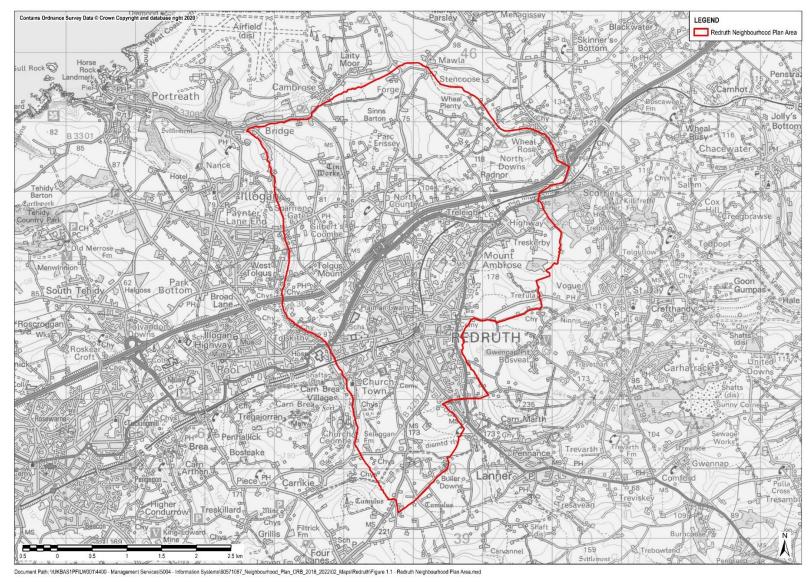


Figure 1.1: The neighbourhood area

1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Redruth Neighbourhood Plan (hereafter referred to as "the RNP").
- 1.2 The RNP is being prepared under the Localism Act 2011⁶ and the Neighbourhood Planning (General) Regulations 2012⁷, and in the context of the Cornwall Local Plan⁸, the key documents of which include the Strategic Policies (2010-2030), Site Allocations Development Plan Document (DPD), the Minerals Safeguarding DPD, and the Climate Emergency DPD.
- 1.3 The neighbourhood area is depicted in Figure 1.1 above and covers the parish of Redruth, in south west Cornwall.

SEA Screening for the Redruth Neighbourhood Plan

- 1.4 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, Neighbourhood Plans are more likely to be screened in as requiring an SEA if <u>both</u> the following apply:
 - the Neighbourhood Plan is being prepared within a neighbourhood area with significant environmental constraints, such as, for example, Special Areas of Conservation, Sites of Special Scientific Interest, or large concentrations of heritage assets; and
 - 2) the Neighbourhood Plan is likely to allocate sites for development⁹.
- 1.5 The RNP is supportive of new development in the neighbourhood area, which is an environmentally constrained part of Cornwall. This includes several internationally and nationally significant environmental and heritage designations, including (but not limited to): the Cornwall and West Devon Mining Landscape World Heritage Site (WHS), listed buildings, scheduled monuments, two conservation areas, the Zone of Influence (ZOI) for the Fal and Helford Special Area of Conservation (SAC) and the West Cornwall Bryophytes Site of Special Scientific Interest (SSSI).
- 1.6 With respect to the above, SEA screening concluded that the RNP has the potential to have significant environmental effects. In light of this outcome, an SEA process is being undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)¹⁰.
- 1.7 Since SEA screening and scoping was undertaken, the RNP is no longer seeking to allocate land for housing or employment development. Whilst there is a case for the RNP to be rescreened (given one of the two key screening

⁶ UK Government (2011) 'Localism Act 2011)' can be accessed here.

⁷ UK Government (2012) 'The Neighbourhood Planning (General) Regulations 2012' can be accessed <u>here.</u>

⁸ Cornwall Council (2016) 'Cornwall Local Plan 2010-2030' can be accessed here.

⁹ DLUHC (February 2022): Chief Planner's Newsletter, February 2022 "Strategic Environmental Assessment for Neighbourhood Plans: Timely and effective screening" accessible here

¹⁰ UK Government (2004) 'The Environmental Assessment of Plans and Programmes Regulations 2004' can be accessed here.

considerations highlighted in Section 1.4 above now longer applies), the SEA process has been continued to support the evidence base for the RNP.

SEA explained

- 1.8 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA for the RNP seeks to maximise the emerging plan's contribution to sustainable development.
- 1.9 Two key procedural requirements of the SEA Regulations are that:
 - When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
 - ii. A report (the 'Environmental Report') is published for consultation alongside the draft plan (i.e., the draft RNP) that presents outcomes from the environmental assessment (i.e., discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.10 This 'Environmental Report' is concerned with item 'ii' above.

Structure of this Environmental Report

1.11 This document is the SEA Environmental Report for the RNP and hence needs to answer all four of the questions listed in **Table 1.1** below with a view to providing the information required by the SEA Regulations. Specifically:

Table 1.1: Questions that must be answered by the SEA Environmental Report to meet the regulatory¹¹ requirements

| Environment question | ntal Report | In line with the SEA Regulations, the report must include ¹² |
|------------------------------|---------------------------------------|---|
| | What is the plan seeking to achieve? | An outline of the contents and main objectives of the plan. |
| What's the scope of the SEA? | What is the sustainability 'context'? | Relationship with other relevant plans and programmes. The relevant environmental protection objectives, established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance. |

¹¹ Environmental Assessment of Plans and Programmes Regulations 2004

¹² NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

| Environmental Report question | In line with the SEA Regulations, the report must include ¹² | | |
|---|--|--|--|
| What is the sustainability 'baseline'? | The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance. | | |
| What are the key issues and objectives? | Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment. | | |
| What has plan-making/SEA involved up to this point? | Outline reasons for selecting the alternatives dealt with. The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan. | | |
| What are the assessment findings at this stage? | The likely significant effects associated with the Regulation 14 version of the plan. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Regulation 14 version of the plan. | | |
| What happens next? | The next steps for the plan making / SEA process. | | |

2. Local Plan context and vision for the Redruth Neighbourhood Plan

Local Plan context for the Neighbourhood Plan

- 2.1 The key document for the Cornwall Local Plan, 'Cornwall Local Plan: Strategic Policies 2010-2030'¹³, was adopted in November 2016. It sets out the main planning approach and policies for Cornwall to meet the county's economic, environmental, and social needs within the plan period and work towards its aims for the future. The Cornwall Local Plan identifies a requirement for 5,200 new dwellings across the wider Camborne, Pool, Illogan & Redruth Community Network Area (CNA).
- 2.2 Prepared on behalf of the Neighbourhood Plan Steering Group, the Housing Needs Assessment (HNA) has worked in collaboration with Cornwall Council to determine a proportioned figure for Redruth. This is given that the CNA includes settlements which are outside of the neighbourhood area. In this respect, a total of 1,960 dwellings out of the 5,200 for the CNA are to be delivered within the neighbourhood area during the Local Plan period.

Redruth Neighbourhood Plan vision and objectives

- 2.3 The vision of the RNP is set out across three core values; all future decisions taken for Redruth (including planning decisions) should be taken in line with the core values, which are:
 - Core Value 1: Distinctively Cornish "This is authentic Cornwall. We're independent without being exclusive and everyone is welcome to be part of our diverse Cornish culture. We're working to develop into an affordable, modern, creative, progressive Cornish town that works for everyone."
 - Core Value 2: Resourceful and Regeneration "We're embracing a repurposed economy. We want to be known as a place that's leading the charge for a more sustainable and equal society, where a groundswell of grassroots actions is already driving positive change. We're resilient, adaptable and are working to create our own solutions to society's big issues."
 - Core Value 3: Sparking Ideas "Redruth has a history of being the heart
 of stories in Cornwall; a spark of change with the potential to be as
 revolutionary as the spark that lit William Murdoch's first gas lamp. Our
 communities are ready for innovation and progress, where our ambitious
 young voices help to drive purposeful change."
- 2.4 To achieve the vision, a number of objectives have been set out under eleven themes as follows: Town Vision; Climate Change; Design Code; Historic Environment and Heritage Assets; Housing; Town Centre; Employment Centres not in the Town Centre; Transport; Green Infrastructure; Health; and Education.

¹³ Cornwall Council (2016) 'Cornwall Local Plan: Strategic Policies 2010-2030' can be accessed here.

3. What is the scope of the SEA?

Summary of SEA Scoping

- 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".
- 3.2 In England, the consultation bodies are Natural England, the Environment Agency, and Historic England¹⁴. These authorities were consulted on the scope of the SEA between December 2020 and January 2021.
- The purpose of scoping was to outline the 'scope' of the SEA through setting out the following information:
 - A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the RNP.
 - Baseline data against which the RNP can be assessed.
 - The key sustainability issues for the RNP; and
 - An 'SEA Framework' of objectives against which the RNP can be assessed.
- The comments provided by the consultees on the RNP SEA Scoping Report. and how they have been addressed, are presented in Table 3.1 below.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response

How the response was considered and addressed

Environment Agency

Sustainable Places – Planning Advisor (email response received 7th January 2021)

In general we consider that it is unlikely that Comment noted. neighbourhood plans will result in any significant environmental effects unless the plan allocates or encourages development over that set out in the Local Plan. Otherwise we consider that any potential for environmental effects from growth in the parish should already have been addressed through the Sustainability Appraisal (SA) which supported the adopted Local Plan.

We have no comments to make on this consultation at this stage.

Historic England

Historic Places Advisor (email response received 20th January 2021)

We would recommend adding reference to our Guidance on Site Allocations as this is relevant to Neighbourhood Plans as well as Local Plans.

Comment noted. The highlighted guidance has been a useful source of reference during the SEA process.

¹⁴ These consultation bodies were selected "by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effect of implementing plans and programmes" (SEA Directive, Article 6(3)).

Consultation response

We note that there is no Appraisal or Management Plan for the Carn Brea Conservation Area and depending on how this might be affected by, or need to be considered due to, the eventual policy proposals within the Plan thought will need to be given to how this gap in the evidence base should be addressed to ensure informed decision making and demonstrable conformity with overarching planning policy.

How the response was considered and addressed

The absence of appraisal and management plan for the Carn Brea Conservation Area is recognised as a gap in the evidence base.

Potential impacts to the historic environment associated with the policies and proposals within the Neighbourhood Plan is presented within Chapter 4 and Chapter 5 of this Environmental Report.

We would also take this opportunity to highlight the High Street Heritage Action Zone (HSHAZ) we are sponsoring for Redruth which has recently started. This sets out a programme of funded work aimed at enhancing the physical fabric of the town centre, engaging the local community, and capitalising on the area's potential for cultural development. To ensure the sustainability of these activities we will be working with the local community to explore what additional measures or initiatives it might be desirable to develop alongside or after the HSHAZ, particularly in the form of physical interventions, and enhanced management or policy provisions for the area.

Thank you for highlighting the High Street Heritage Action Zone sponsorship, this has been referred to throughout this report.

In this respect it would probably be useful to encourage the community to begin to think about the relationship between the HSHAZ and its emerging Plan and providing a reference "hook" within the SEA Scoping exercise could be a helpful prompt.

Natural England

Lead Adviser (Sustainable Development) (email response received 20th January 2021)

Natural England generally agrees with the scope and level Comment noted. of detail to be included in the Environmental Report.

General comments

Redruth Neighbourhood Plan Steering Group should consider that the neighbourhood plan will need to be subject to the requirements of the Conservation of Habitats and Species Regulations 2017 on the conservation of natural habitats and of wild flora and fauna, referred to herein as the "Habitats Regulations".

Natural England advise that a Habitats Regulations Screening Assessment is undertaken to fully assess whether the neighbourhood plan should be subject to an appropriate assessment

Comment noted. Α Habitats Regulations Assessment process has been undertaken, with the report accompanying the RNP at Regulation 14 consultation.

Recommendations within the HRA have been considered by plan makers.

Baseline information

Please see attached annex for our advice on sources of evidence on the natural environment

Comment noted. The advice within the annex has been a useful reference point during the SEA process.

Consultation response

How the response was considered and addressed

Sustainability objectives

Biodiversity – the objectives for the Biodiversity and Geodiversity appear to be comprehensive. We would advise, however, that the objectives include an assessment question that seeks to ensure current ecological networks are not compromised, and future habitat connectivity is not prejudiced.

Landscape – agree the objectives are appropriate for this topic

Soils – agree the objectives are appropriate but suggest that 'Avoid the development of the best...' is replaced with 'Avoid the loss of the best...'.

Access to nature – we welcome the inclusion of a subobjective that will 'provide and enhance the provision of community access to green infrastructure...', however, we would suggest the objective also includes a commitment to avoiding impacts on the quality and extent of existing green infrastructure/recreational assets.

We would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact us.

Comment noted. The suggested assessment questions for biodiversity and health and wellbeing haves been added into the SEA Framework, and the soils assessment question has been amended as suggested.

- 3.5 Since the publication of the SEA Scoping Report in July 2020, it is acknowledged that there have been several emerging policy drivers and evidence base documents which have informed the development of the Neighbourhood Plan. Key sources of evidence in this respect include the revised NPPF (2023), the Environment Act (2021), the Levelling-Up and Regeneration Bill (2022), and the Climate Emergency DPD (2023).
- 3.6 These policy considerations and evidence base documents have been essential sources of evidence during the subsequent stages of the SEA process.
- 3.7 Baseline information (including the context review and baseline data as presented within the SEA Scoping Report) is presented in **Appendix A**. The key sustainability issues and SEA Framework are presented below.

Key sustainability issues

Air quality

- The air quality management area (AQMA) covers the Camborne-Pool-Redruth regeneration area, with the main areas of concern including: the A3047 and B3300, Wesley Street (Camborne), Tuckingmill and East Hill (Camborne), West End/Penryn Street (Redruth) and Trefusis Junction (Redruth).
- Nitrogen dioxide (NO₂) is the key pollutant of concern within the neighbourhood area, with the AQMA primarily designated for exceedances in the annual mean concentration objective of 40µg/m³.

 It will be important to consider any potential traffic and congestion issues arising within and surrounding the neighbourhood area as a result of new development proposals.

Biodiversity and geodiversity

- The northern, eastern and southern sections of the neighbourhood area are within the ZOI for the Fal and Helford SAC. In the wider context, there are two SACs within a 5km radius of the neighbourhood area: Bristol Channel Approaches SAC (with Marine Components), and Godrevy Head to St Agnes SAC.
- The West Cornwall Bryophytes SSSI is within the neighbourhood area. In the wider context, there are four additional SSSIs located within a 5km radius from the neighbourhood area, including: Wheal Gorland SSSI, Carrick Heaths SSSI, Godrevy Head to St Agnes SSSI, and Nance Wood SSSI.
- Most of the neighbourhood area overlaps with either one or multiple SSSI Impact Risk Zones (IRZs) for the types of development likely to be taken forward during the plan period (i.e., residential, rural-residential or rural nonresidential development types).
- At the local level, there are two county wildlife sites (CWS) within the neighbourhood area, as follows: Tolgus CWS and Treskerby Wood CWS.
- There is a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the neighbourhood area, predominantly areas of calaminarian grassland, deciduous woodland, lowland fens, lowland heathland, maritime cliff and slope, purple moor grass and rush pasture, and traditional orchard.
- Given Redruth's mining heritage, it is possible that the neighbourhood area might contain one or more county geology sites (CGS). In the absence of any detailed mapping, it is currently not possible to confirm whether there are any CGS in the neighbourhood area.
- The Environmental Records Centre for Cornwall and the Isles of Scilly contains records of protected or notable species within the neighbourhood area. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians, and reptiles.

Climate change

- Source data from the Department of Energy and Climate Change suggests that Cornwall has seen a 36.3% reduction in total emissions per capita between 2005 and 2016, slightly lower than the reductions for the South West of England (36.7%) and England (37.6%).
- Cornwall Council declared a climate emergency in 2019, and has resolved to support local authorities (and, by extension, neighbourhood groups) to help tackle climate change through plan-making where possible.
- The Neighbourhood Plan should seek to maximise opportunities to support actions in tackling climate change. This may include through encouraging

- sustainable transport technologies, such as the use of electric vehicles (EVs), and through the use of sustainable drainage systems.
- Areas of land within Flood Zone 2 and Flood Zone 3 are broadly confined to Portreath Stream, which is the main watercourse passing through the neighbourhood area. Future growth and development should be directed away from the high-risk areas.
- There are several areas of Redruth which have a medium-high surface water flood risk, primarily the local road network. The strategic flood risk assessment (SFRA) confirms that the two key sources of surface water flooding are runoff from agricultural or undeveloped land, and urban areas.

Landscape and townscape

- Most of the neighbourhood area overlaps with the 'Cornish Killas' National Character Area (NCA). A small area of land towards the southern boundary of the neighbourhood area overlaps with the 'Carnmenellis' NCA. NCA profiles contain several statements of environmental opportunity (SEOs) which seek to protect and enhance the special qualities of these areas.
- Most of the neighbourhood area is within Local Character Area (LCA) 11
 (Redruth, Camborne and Gwennap'. The southern section of the
 neighbourhood area is within LCA 10 'Carnmenellis'. The LCA descriptions
 contain an overview of the key characteristics, pressures, and planning /
 land management guidelines for each area.
- There are five main Historic Landscape Classification (HLC) zones within the neighbourhood area, including: Settlement: older core (pre-1907), Farmland: Medieval, Farmland: Post Medieval, Upland Rough Ground, and Industrial: Disused.
- Cornwall Council have designated numerous tree preservation orders (TPOs) in the interest of their amenity value.
- Views across the parish are also an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process.

Historic environment

- The neighbourhood area partly overlaps with the 'Camborne & Redruth with Portreath' area of the Cornwall and West Devon Mining Landscape WHS.
- Redruth is a town of distinctive and strong character borne from its varied and interesting history. It can trace its origins to the early medieval period, but much of its character derives from the prosperity which it experienced in the 18th and 19th centuries, when it was a major centre for the Cornish tin and copper-mining industry. The town experienced a decline in the 20th century, linked to the vagaries of the mining industry, but the town has a rich heritage that provides a sound basis for regeneration.

- According to the National Heritage List for England, the neighbourhood area contains 94 listed buildings, including two Grade II* listed buildings and 92 Grade II listed buildings.
- It is currently not possible to determine whether any of the Grade II listed buildings within the neighbourhood area are at risk.
- There are two scheduled monuments within the neighbourhood area, including: Part of the mining complex at Wheal Peevor, and The Tolgus arsenic works 80m south east of East Tolgus House.
- There are three conservation areas which wholly or partly overlap with the neighbourhood area. Redruth Town Centre Conservation Area and Plainan-Gwarry Conservation Area are wholly located within the existing settlement boundary for Redruth. Carn Brea Conservation Area is partly within the western section of the neighbourhood area.
- There are six key threats to the Redruth Town Centre Conservation Area and four key threats to the Plain-an-Gwarry Conservation Area, as listed within their respective appraisal and management strategy documents.
- The conservation area appraisals and management strategy documents for Redruth Town Centre and Plain-an-Gwarry also contain several management and enhancement principles and actions, grouped into the following themes: public realm (including paving, signage, lighting and street furniture), landscape, views, traffic and movement, new building, building maintenance, historic detailing and materials, and sustainability.
- It is important to note that a conservation area appraisal or management strategy has not been prepared for Carn Brea, therefore it is not currently possible to gain an in-depth understanding of the special interest of the area.
- the Cornwall and Scilly historic environment record (HER) identifies 683 records within the neighbourhood area including many Post-Medieval and Medieval features associated with the former mining industry.
- According to the 2020 Heritage at Risk Register for South West England, there are two heritage assets within the boundaries of the neighbourhood area which are at risk. Specifically: Sara's Foundry (Grade II* listed building) and Tolgus arsenic works 80m south east of East Tolgus House (Scheduled Monument).

Land, soil, and water resources

- In terms of the location of the best and most versatile agricultural land, there
 is a corridor of Grade 3a land to the east of the town (adjacent to the A393)
 between Treskerby and Lanherne Farm. However, a detailed classification
 has not been undertaken for most of the areas of undeveloped land in the
 northern and southern sections of the neighbourhood area.
- The provisional agricultural land classification (ALC) dataset provided by Natural England indicates that the undeveloped areas of land within the northern section of the neighbourhood area are predominantly underlain by areas of Grade 3 (good to moderate) agricultural land. The neighbourhood

area therefore has the potential to contain some areas of best and most versatile land.

- The Portreath Stream passes through the central, western, and north western sections of the neighbourhood area. Additional water resources located within and within proximity to the parish include small ponds and drainage ditches alongside field margins.
- The most recently completed water quality assessments undertaken in 2019 classifies the Portreath Stream as having a 'moderate' ecological status and a 'fail' chemical status. The reasons for not achieving goof water status (RNAGs) are primarily attributed to diffuse and point source pollution from abandoned mines, including from nickel, zinc, copper, and cadmium.
- With reference to mineral resources, sections of land within the neighbourhood area overlap with a metals mineral safeguarding area (MSA).

Community wellbeing

- The neighbourhood area saw an increase in population of approximately 13.5% between 2001 and 2011. This is at least 5% greater than the comparative increases observed for Cornwall, South West England, and England during this period.
- The Steering Group highlight that population growth is not evenly spread across the neighbourhood area. With reference to individual wards, 'Redruth North' is growing and is anticipated to continue growing at twice the rate of 'Redruth Central' and 'Redruth South'.
- A higher percentage of households in the neighbourhood area are deprived in at least two dimensions in comparison to the regional and national trends.
- A higher percentage of residents in the neighbourhood area live within socially rented or privately rented accommodation in comparison to the regional and national trends.
- Most of the neighbourhood area contains some of the most deprived areas in England. Areas of land within and surrounding Redruth town centre are some of the top 10% most deprived areas in England.
- Key employment sites within the neighbourhood area include Redruth town centre, Cardrew Industrial Estate, and Treleigh Industrial Estate.
- The services and facilities within the neighbourhood area supports community vitality and the quality of life of residents, with the availability of community assets essential for continued growth within the neighbourhood area.
- As the requirements of the working population continue to change, particularly in response to the COVID-19 pandemic, there is likely to be a requirement for adaptable dwellings which can accommodate more flexible working practices.

- Locally important open spaces in the neighbourhood area include: Treskerby Wood, Fairfields Park, Saint Day Road Cemetery, Trewirgie Cemetery, Gwealan Tops Adventure Playground, Trefusis Park, and Victoria Park.
- The percentage of residents that have 'bad' health or worse in the neighbourhood area (8.0%) is higher than the regional and national trends. Approximately 22.4% of residents in the neighbourhood area report that their daily activities are limited in some way. This is also higher than the regional and national trends.
- The housing needs assessment (HNA) has established the need for affordable homes, housing for older people and housing for specialist needs, many of which tend to be smaller dwellings.
- Access to health care provision within the neighbourhood area will continue to be important in response to population growth and an increasing ageing population.

Transportation

- The northern section of the neighbourhood area is relatively rural in character and is therefore less well connected in comparison to the central and southern sections (which encompass the town).
- The results of a recent community survey indicated that 42% of Redruth's
 residents consider the existing road infrastructure to be somewhat or
 completely inadequate to sustain future developments. Those unhappy with
 the road infrastructure describe access and layout being inadequate, traffic
 congestion and delays, and problems with traffic planning and constant road
 works.
- The Neighbourhood Plan Steering Group note that cycle routes and footways often do not join up and have areas where connections do not exist.
- The recovery from the COVID-19 pandemic has the potential to change travel patterns in the village in the short, medium and (potentially) longer term.

SEA Framework

3.8 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard 'tests'. Each proposal within the current version (i.e., the Regulation 14 version) of the RNP will be assessed consistently using the Framework.

Table 3.2: SEA Framework

SEA theme SEA objective Assessment questions (will the proposal help to)

Air quality Deliver improvements in air quality in the neighbourhood area

Assessment questions (will the proposal help to)

• Reduce emissions of pollutants from transport?

• Promote the use of low emission vehicles?

| SEA theme | SEA objective | Assessment questions (will the proposal help to) |
|-------------------------------|---|---|
| | | Promote enhancements in sustainable modes of transport, including walking, cycling and public transport? Promote enhancements to green infrastructure networks to facilitate increased absorption and dissipation of nitrogen dioxide and other pollutants? |
| Biodiversity and geodiversity | Protect and enhance all biodiversity and geodiversity | Support the integrity of the European designated biodiversity sites located within proximity to the neighbourhood area? Support the status of the nationally and locally designated sites biodiversity sites within and within proximity to the neighbourhood area? Protect and enhance priority habitats and species? Achieve biodiversity and environmental net gains and support the delivery of ecosystem services and multifunctional green infrastructure networks? Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks? Support access to, interpretation and understanding of biodiversity and geodiversity? Ensure current ecological networks are not compromised, and future habitat connectivity is not prejudiced. |
| Climate change | Reduce the contribution to climate change made by activities within the neighbourhood area | Reduce the number of journeys made? Reduce the need to travel? Promote the use of sustainable modes of transport, including walking, cycling and public transport? Increase the number of new developments meeting or exceeding sustainable design criteria? Support the generation of energy from low or zero carbon sources? Reduce energy consumption from non-renewable resources? |
| | Support the resilience of the neighbourhood area to the potential effects of climate change, including flooding | Ensure that inappropriate development does not take place in areas at higher risk of fluvial, groundwater and surface water flooding, taking into account the likely future effects of climate change? Improve and extend green infrastructure networks in the neighbourhood area to support adaptation to the potential effects of climate change? Sustainably manage water run-off, reducing surface water runoff (either within the points bourhood area or downstream)? |

neighbourhood area or downstream)?

in the neighbourhood area?

Ensure the potential risks associated with climate change are considered through new development

Encourage the use of sustainable drainage techniques through new infrastructure provision?

| SEA theme | SEA objective | Assessment questions (will the proposal help to) |
|---------------------------------|---|---|
| Landscape and townscape | Protect and enhance the character and quality of | Conserve and enhance the special qualities of the neighbourhood area? |
| | landscapes, townscapes and villagescapes. | Conserve and enhance locally important landscape, townscape and villagescape features within the neighbourhood area? |
| | | Conserve and enhance local diversity and character? |
| | | Protect and enhance locally important viewpoints which contribute to the unique sense of place and visual amenity of the neighbourhood area? |
| Historic environment | Protect, conserve, and enhance heritage assets within the neighbourhood | Conserve and enhance the outstanding universal value of the WHS in line with the objectives and priority actions within the Management Plan? |
| | area | Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? |
| | | Conserve and enhance the special interest, character and appearance of locally important features and their settings? |
| | | Guide development proposals to secure remediation of issues identified as affecting the conservation areas and prevent cumulative impacts? |
| | | Support the integrity and the historic setting of sites of archaeological or historic interest recorded on the Cornwall and Scilly HER? |
| | | Support access to, interpretation and understanding of the historic evolution and character of the environment? |
| | | Conserve and enhance archaeological remains, including historic landscapes? |
| Land, soil, and water resources | Ensure the efficient and effective use of land. | Promote the use of previously developed land? Avoid the loss of the best and most versatile agricultural land, which in the parish may comprise Grade 1 to 3a agricultural land? |
| | | Protect the integrity of mineral resources? |
| | Promote sustainable waste management solutions that encourage the reduction, reuse, and recycling of waste. | P |
| | | waste? |
| | | Maximise opportunities for local management of waste in order to minimise export of waste to areas outside? |
| | | Encourage recycling of materials and minimise consumption of resources during construction? |
| | Use and manage water resources in a sustainable manner. | Ensure that there is no deterioration to water quality, whilst supporting improvements consistent with the aims of the River Basin Management Plan? |
| | | • Protect surface water and groundwater resources? |

• Minimise water consumption?

SEA theme SEA objective Assessment questions (will the proposal help to) Community Cater for existing and Encourage and promote social cohesion and wellbeing future residents' needs as encourage active involvement of local people in well as the needs of community activities? different groups in the Maintain or enhance the quality of life of existing community, and improve local residents? access to local, high-Improve the availability and accessibility of key quality community services local facilities, including specialist services for and facilities. disabled and older people? Encourage and promote employment opportunities to support economic vitality? Provide everyone with the Support the provision of a range of house types and sizes? opportunity to live in good quality, affordable housing, Support enhancements to the current housing and ensure an appropriate stock? mix of dwelling sizes, Meet the needs of all sectors of the community? types, and tenures. Provide quality and flexible homes that meet people's needs? Promote the use of sustainable building techniques, including use of sustainable building materials in construction? Provide housing in sustainable locations that allow easy access to a range of local services and facilities? Improve the health and Promote accessibility to a range of leisure, health, and community facilities, for all age groups? wellbeing residents within the neighbourhood area. Address the key challenges identified in the JSNA? Support green infrastructure networks? Provide and enhance the provision of community access to green infrastructure in accordance with Accessible Natural Greenspace Standards? Avoid impacts on the quality and extent of existing green infrastructure / recreational assets. Protect and enhance access to nature via greenspace, footpaths, and cycleways? Promote the use of active modes of travel? Encourage healthy lifestyles and reduce health inequalities? Improve access to the countryside for recreational Avoid any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths? Transportation Promote sustainable Encourage modal shift to more sustainable forms of travel?

transport use and reduce

the need to travel.

Facilitate working from home and remote working?

Reduce the impact on residents and the built

environment from the road network?

Improve road safety?

4. Consideration of reasonable alternatives for the Redruth Neighbourhood Plan

Introduction

- 4.1 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
 alternatives appraised.
- 4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, how the SEA process to date has informed the consideration of different approaches for key elements of the RNP.

Establishing reasonable alternatives

- 4.3 Whilst work on the RNP has been underway for some time, the aim here is not to provide a comprehensive explanation of work to date, but rather to explain work undertaken to develop and appraise reasonable alternatives.
- 4.4 In the context of the above, this chapter of the Environmental Report presents information on reasonable alternative approaches to addressing key issues that are of central importance to the RNP.

Top-down considerations (e.g., strategic factors)

- 4.5 The Cornwall Local Plan identifies a requirement for 5,200 new dwellings across the wider Camborne, Pool, Illogan & Redruth Community Network Area (CNA).
- 4.6 Prepared on behalf of the Steering Group, the Housing Needs Assessment (HNA) has worked in collaboration with Cornwall Council to determine a proportioned figure for Redruth. This is given that the CNA includes settlements which are outside of the neighbourhood area. In this respect, a total of 1,960 dwellings out of the 5,200 for the CNA are to be delivered within the neighbourhood area. Deducting completions (up to the end of March 2020) reduces the total to a residual requirement for 1,178 additional homes between 2019-2030 (or 1,038 dwellings from 2020 to 2030, as highlighted within the latest draft version of the Neighbourhood Plan).
- 4.7 Reflecting the HNA findings, this should ideally include: 334 care homes; 305 specialist housing for disability or health related challenges; and 539 open market housing (including 25% affordable homes).
- 4.8 However, reflecting the number of approved permissions up to the end of March 2020 (596 homes), outline permissions by the end of March 2020 (383 homes, including Tolgus Urban Extension), decisions which are pending at

- present (30 homes), and pre-applications (34 homes), the overall total comes to 1,965 homes. Given that this number would slightly exceed the housing target of 1,960 homes, Redruth is on track to meet housing requirements (in terms of the total number of new homes).
- 4.9 In this respect, the RNP does not seek to allocate land for development. Therefore, reasonable alternative approaches for the level and distribution of growth have not been explored through the SEA. These elements were considered for the Sustainability Appraisal (SA) for the Cornwall Local Plan.

Bottom-up considerations (e.g., site availability)

- 4.10 Whilst the RNP does not need to allocate land for development within the neighbourhood area, the Steering Group has explored a range of planning issues and considerations for the RNP relating to its vision and aspirations (as presented in **Chapter 2** within the main body of the Environmental Report).
- 4.11 For example, as the HNA identifies the need for specific housing types and tenures within the neighbourhood area, the Steering Group were keen to consider whether there were any opportunity sites which could be brought forward as allocations through the Neighbourhood Plan which would:
 - Meet specific needs of the community; and/or
 - Positively contribute to the vision/objectives for the neighbourhood area.
- 4.12 Two opportunity sites were identified in this respect, specifically: Brewery Site; and Fairmeadow Car Park.
- 4.13 In light of this, the SEA process has undertaken appraisals of high-level approaches and alternatives (hereafter referred to as "options") which are currently being evaluated as part of plan development. This is for the benefit of plan-makers tasked with selecting preferred policy approaches for the RNP and to highlight to consultees the relative sustainability merits of the different approaches that can be taken relating to the key elements of the Plan.

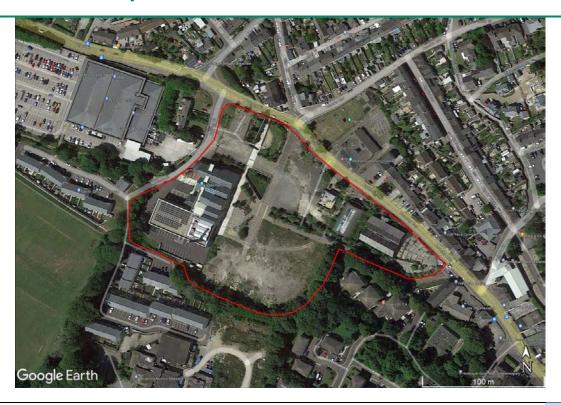
Consideration of opportunity sites through the SEA

Brewery Site

- 4.14 To support the consideration of the suitability of the Brewery Site for a potential allocation of a type appropriate for the RNP, the SEA has appraised the key constraints and opportunities present at the site.
- 4.15 The site has been considered in relation to the SEA Framework of objectives and decision-making questions developed during SEA scoping and the baseline information.
- 4.16 The assessment findings are presented below in **Table 4.1**.

Table 4.1: Assessment findings for the Brewery Site

SEA Theme Brewery Site



Air quality

The site sits within the Camborne, Pool and Redruth Air Quality Management Area (AQMA), which was declared in 2005 due to exceedances in the national annual mean objective for nitrogen dioxide (NO₂), linked to traffic volume, congestion, and / or street-canyon effects. The AQMA did not record exceedances of the $40\mu g/m^3$ target in 2021 according to the 2022 Air Quality Annual Status Report produced by Cornwall Council: continuing this trend from 2020. The Cornwall Council Air Quality Action Plan, published in 2020, outlines six measures to reduce air pollution in the AQMA, which includes (but is not limited to): on-going traffic and air quality monitoring, traffic light improvements, improved cycle network, and increased bus frequency and provision.

The Cornwall Council Interactive Map indicates there are two air quality sample areas within 100m of the site – CPR274 on Brewery Road approximately 30m north-east, and CPR267 on the footpath to Tesco approximately 50m east. However, it is unclear whether these monitoring stations are still active, as there are no recent records for them. Regeneration of the site could lead to more traffic on the roads (and an increase in monitored pollutants) depending on the new use, but the effect on local monitoring stations is uncertain.

In conclusion, the Camborne, Pool and Redruth AQMA has not recorded exceedances in NO_2 since 2020, and the effect of regenerating this site on the local air quality is unknown given the uncertainty surrounding future use. As such, **uncertain effects** are concluded as likely for this SEA theme for the regeneration of this site.

SEA Theme Brewery Site

Biodiversity and geodiversity

This site does not overlap with any international, national or local designations for biodiversity or geodiversity, nor is it in proximity to any. As such, it is not subject to any Site of Special Scientific Interest (SSSI) Impact Risk Zones (IRZs) for residential development and non-residential development, given the distance from designations.

Whilst there are no Biodiversity Action Plan (BAP) Priority Habitats within the site boundaries, there is an area of deciduous woodland approximately 80m. south-west of the site. Development of this site could impact upon this habitat through increased sound and light pollution during the construction and delivery phases. Whilst the site is a distance from this habitat, existing trees and hedgerows within the site and on the site boundaries to the west, south and east do extend southwards and connect to this habitat. As such, regeneration of the site could impact the biodiversity connectivity of the area through the removal of green infrastructure. Given this, the trees and hedges on the site should be retained through the design to reduce this risk and continue to allow species movement and could be extended where appropriate to improve connectivity. It is noted that the site has not been identified as being suitable for habitat creation, expansion or restoration by Natural England. That is not to say that biodiversity net gain could not be achieved on this site, but rather regeneration of this site is not likely to affect the wider biodiversity network of the neighbourhood area.

Overall, broadly **neutral effects** are considered likely through the regeneration of this site. This reflects the relative distance of the site from biodiversity and geodiversity designations and local habitats. However, it is noted biodiversity net gain measures through the design of a regeneration scheme could bring forward positive effects through implementing green spaces and infrastructure, which will contribute to the local biodiversity network.

Climate change

Regeneration of this site could lead to increases in greenhouse gas emissions, depending on the type of scheme taken forward. This increase could come from the construction phases, the growth of the built footprint of Redruth, and / or an intensification of use at the site. However, schemes such as creating a public open space would not lead to as much of an increase in greenhouse gas emissions due to a reduced level / no new development. Additionally, as this is a site in existing use it is unlikely regeneration of the site will result in large increases in greenhouse gas emissions from this site.

Regarding flood risk, the majority of the site is within Flood Zone 2 and Flood Zone 3, associated with the watercourse running through the site. As such, the majority of the site is at medium and high risk of fluvial flooding; with the southern third not at risk. The site is also at low, medium and high risk of surface water flooding — again, likely linked to the watercourse and the brownfield nature of the site. The areas at surface water flood risk are found adjacent to the road on the northern site boundary, extending southwards to the Kresen Kernow building and other structures to the east, as well as in the middle of the site. As such, the site could benefit from the installation of sustainable urban drainage systems (SuDS) to help reduce the effects of flooding by reducing surface flood water, in line with higher planning policy.

In conclusion, regenerating this site could lead to increases in greenhouse gas emissions depending on the type of scheme brought forward. As the site is at a high risk of fluvial and surface water flooding, bringing the site forward for development is not recommended. At this time, **negative effects** are concluded most likely for this SEA theme – reflecting the high flood risk of the site.

SEA Theme Brewery Site

Community wellbeing

Redruth has a good mix of services, facilities and amenities. These provide the community with access to supermarkets, a range of pubs and restaurants, GP and dental practices, retail opportunities, a number of educational facilities (including a secondary school), and sports provision. The site is within the existing development boundary of Redruth. Access to these services and facilities from this site would therefore be relatively easy – requiring a walk or journey via public transport or private vehicle, depending on the distance.

The size of the site could allow for development to support a range of housing types and tenures, including affordable housing provision. Additionally, development schemes could bring forward significant public realm enhancements through sensitive design of this site and / or expanding the existing on-site community uses. This includes the western part of the site which is already in community use – it is anticipated this area will be retained through redevelopment of the site. Reflecting on this, a range of uses on this site may be the most suitable approach in order to secure the most benefits for the community.

Given the site is located within the development boundary and adjacent to existing development, bringing this site forward would not extend the urban built form of Redruth. It is noted that a public right of way (PRoW) crosses the middle of the site in a north-west to south-east direction, allowing for safe active travel opportunities to the B3300 Tolgus Vean and the B3300 Foundry Row.

Overall, **positive effects** are considered likely if this site is allocated for development. This is due to the site's position in relation to the services and facilities of Redruth, it's location within the existing development boundary of the settlement, and it's potential to bring forward a good level and mix of housing.

SEA Theme Brewery Site

Landscape and townscape

There are no landscape designations overlapping with this site. It is located within the built-up area of Redruth and comprises an area of brownfield land with a level of existing development within the boundaries. As such, regenerating this site is unlikely to cause adverse townscape impacts given the location – however, development could influence the visual amenity from existing residential development to the north and other buildings in proximity. This could bring forward positive or negative effects depending on the development scheme and the consideration given to visual effects, for example enhanced planting of trees to screen the development from view.

The site sits within the Cornish Killas National Character Area (NCA) and the Redruth, Camborne and Gwennap Local Landscape Area. Pressures on this landscape include development pressure, conflicts in land use and landscape reversion due to lack of management. Developing this site is not likely to contribute to these pressures, given the regenerative nature of schemes and the site being bounded by existing development on all sides. If this site was brought forward for residential development, it would be unlikely to encourage further residential development in proximity to it. This is due to the site being surrounded by existing development, which limits growth.

The elevation of this site is relatively flat, with a slight incline to the east / south-east. As such, it is unlikely regenerating this site will impact the visual character of the surrounding townscape. There is a level of screening on the northern boundary due to the presence of some trees, hedgerows and metal fencing. It is likely that the existing screening could be maintained and enhanced through new development areas.

Overall, **positive effects** are considered likely for this SEA theme given the regeneration of this brownfield site could bring forward benefits for the landscape and townscape character. This includes improving the visual amenity of the site from nearby buildings through additional vegetation planting and bringing forward development that integrates with the surrounding structures.

SEA Theme Brewery Site

Historic environment

This site is located within the Cornwall and West Devon Mining Landscape World Heritage Site (WHS). First listed in 2006, the WHS is a testimony to the contribution Cornwall and West Devon made to the Industrial Revolution in Britain during the 18th and early 19th centuries. The site sits within the Camborne and Redruth with Wheal Peevor and Portreath area of the WHS; regarded as the capital of Cornish mining, it was the centre of the mining industry in the county and home to its most important mines and pioneers. Potential impacts are dependent on the design of new development areas. However, positive effects could be brought forward through considerate development, for example by maintaining and enhancing the understanding of the site's significance for the local historic environment and the wider WHS.

This site is mostly within the Plain-An-Gwarry Conservation Area (with the exception of the far eastern section) and is also approximately 100m north-west of the Redruth Town Centre Conservation Area. First designated in 1993, the Plain-An-Gwarry Conservation Area's is threatened by inappropriate redevelopment of this site, flooding of the site and its surrounding area, interventions on gap / opportunity sites, further degradation in the public realm, and modern design values. The Redruth Conservation Area was first designated in 1983, and it is threatened by historic degradation, development further afield affecting traffic levels, schemes and congestion, and inappropriate installation of satellite dishes. Given the location of the site to these conservation areas, it will be important for regeneration to sensitively consider the special qualities and significance of the surrounding environment and not detract from the historic character of the site and the wider area.

In terms of nationally designated heritage assets, there is one Grade II listed building within 100m of the site -5 Chapel Street (HE list entry number: $\underline{1328178}$) to the south-east, however this is likely screened from the site by the existing development which surrounds the site.

It is noted that the site currently hosts the Kresen Kernow – the home of Cornwall's archives. This allows members of the public to explore historical records and is also the base for resources from the Cornwall Record Office, Cornish Studies Library and the Historic Environment Record. It is anticipated that this important community asset will be retained through new development proposals, helping to further the understanding of Redruth's heritage significance.

Overall, **negative effects** are concluded most likely for the historic environment theme. This is due to the site being within the WHS and within / in proximity to two historic conservation areas. New development will directly impact these assets – and in the absence of any specific proposals at this stage, there is uncertainty over these impacts (their duration, and whether they would be positive or negative). However, it is possible development designs could bring forward considerate development that enhances the WHS and the two conservation areas.

SEA Theme Brewery Site

Land, soil, and water resources

This site is a brownfield site within Redruth; as such, redevelopment of this site would promote the most efficient use of land in the neighbourhood area.

The Poltreath Stream waterbody passes through the site. According to the latest condition survey, this waterbody has a moderate ecological status and a failed chemical status given the presence of priority hazardous chemicals (though it is noted all waterbodies failed for chemical issues due to a change in testing method). It will be important for new development areas to encourage opportunities to protect and enhance this waterbody – for example, through incorporating sustainable drainage solutions and natural features, which would help reduce the risks from surface water runoff.

In conclusion, this site will promote the most efficient use of land in Redruth. Additionally, regeneration of this site has the potential to remediate land and improve soil quality, though this is dependent on the adopted scheme design. The site has a waterbody running through it which will also need to be considered through redevelopment. **Positive effects** are concluded likely as long as the waterbody is carefully considered.

Transportation

The nearest bus stop is approximately 120m north-west along Tolgus Hill / B3300, which provides access to five bus services to locations including (but not limited to) Helston, Mullion, The Lizard, Troon, Truro, Pengegon, Portreath, Pool and Camborne. Given this, regenerating the site would deliver new development areas in accessible locations, within proximity to Redruth's public transport networks. There is a rail station in Redruth, located approximately 630m south-east of the site. It is accessible through pavement provision between the station and the site. Redruth rail station allows for rail travel to Penzance, Plymouth, and London Paddington.

The site is located adjacent to the Tolgus Hill / Foundry Row / B3300 strategic road, which allows for vehicular access to the A3047 to the west and the A393 to the south-east, running through the neighbourhood area. This road has pavement provision on one side of it going towards Redruth from the site, and on both sides towards the west – and there is a pedestrian crossing to allow for safe movement across the road to access these features. Additionally, there is a public right of way (PRoW) in the form of a footpath running through the site which allows for safe active transport opportunities to Tolgus Vean to the west, Tesco to the west and Foundry Road / B3300 to the east. This footpath should be retained to allow for safe active transportation methods.

As the site is already developed, it is anticipated access to the site would continue through its current means along Brewery Close.

Considering the above, **positive effects** are anticipated for this SEA theme, as the development area will be located in an accessible location, with good connectivity to public transportation networks. This will encourage opportunities to engage with active and sustainable travel.

| Key | | | |
|---|--|------------------------|--|
| Likely adverse effect (without mitigation measures) | | Likely positive effect | |
| Neutral/no effect | | Uncertain effect | |

Fairmeadow Car Park

- 4.17 Fairmeadow Car Park is allocated for retail uses through the Cornwall Local Plan. However, since the adoption of the Cornwall Local Plan in 2016, it is recognised that there is a renewed focus on town centre regeneration through emerging national policy drivers (e.g., the Levelling-up and Regeneration Bill).
- 4.18 The recently regenerated Buttermarket is located adjacent to Fairmeadow Car Park and is set to reopen in Spring 2024. The revitalised Buttermarket "will provide small specialist shops, affordable workspace, open-air markets, entertainment and a range of small food and drink outlets, helping to revive the town's daytime and evening economy". Additionally, results from a local car park study indicate that Fairmeadow Car Park is currently underutilised, with a maximum 22% occupancy rate on weekends.
- 4.19 In the context of the above, the relative sustainability merits of exploring alternative uses for Fairmeadow Car Park has been explored. The following options have been considered through the SEA:
 - **Option A:** Focus on retail uses at Fairmeadow Car Park (aligning with existing local policy).
 - Option B: Support a range of uses at Fairmeadow Car Park with a wider focus on town centre regeneration (aligning with emerging national policy drivers).

Approach to the options appraisal

- 4.20 Utilising the SEA Framework of objectives and assessment questions development during the earlier scoping stage of the SEA, the options appraisal has been presented through the eight SEA themes scoped into the assessment. The appraisal considers the relative sustainability merits of each option. Findings are presented as a commentary on effects.
- 4.21 To support the appraisal findings, the options have been ranked in terms of their sustainability performance against the relevant SEA theme (e.g., '1' is the most favourable option). It is anticipated that this will provide the reader with a likely indication of the relative performance of the five options in relation to each theme considered. Options which perform similarly are given an equal ranking within the appraisal findings.
- 4.22 **Table 4.2** to **Table 4.9** below present the findings of the options appraisal for each SEA theme.

¹⁵ Redruth Revival (2023): The Buttermarket History

Table 4.2: Appraisal findings: Air quality

Option A: Focus development on retail uses at Fairmeadow Car Park (aligning with existing local policy).

| | Rank of p | reference |
|---|-----------|-----------|
| Discussion of potential effects and relative merits of options | Option A | Option B |
| The site sits within the Camborne, Pool and Redruth Air Quality Management Area (AQMA). Designated for exceedances in nitrogen dioxide (NO ₂) linked to vehicle emissions in 2005, this AQMA has not reported exceedances in air quality targets since 2020. The Cornwall Council Interactive Map also indicates there is a sampling station on the southern boundary – CPR68. However, it is unclear if this station is still active. | | |
| Both Option A and Option B are likely to impact on local air quality. The loss of a car park could increase vehicular movement through Redruth to access alternative parking opportunities or increase vehicle idling whilst waiting for parking spaces to become available. Additionally, the number of vehicles on the local road network in Redruth could increase, as the community will want to access these new opportunities. This would impact on local air quality, and potentially impact on the AQMA, through a greater level of vehicle emissions and pollutants being released. | | |
| However, it is noted parking provision for either option could be incorporated depending on the design of the scheme. This would likely reduce vehicle movement and idling in Redruth. Furthermore, mitigation measures could also be brought forward through the design; for example, the incorporation of onstreet tree planting, which will help improve the air quality through pollutant absorbance. This is perhaps more readily achievable through Option B, which seeks to encourage a range of uses on the site. For example, this may include opportunities for green areas and open spaces which would help to improve local air quality. However, in the absence of any specific proposals for the site at this stage and given the existing air quality baseline at this location is good, effects are considered comparable between both options. | =1 | =1 |
| Both options have the potential to impact upon the Camborne, Pool and Redruth AQMA and local air quality. Given the impacts on air quality are very much dependent on the design schemes put forward, air quality effects are currently considered to be comparable between both options. | | |

Table 4.3: Appraisal findings: Biodiversity and geodiversity

Option A: Focus development on retail uses at Fairmeadow Car Park (aligning with existing local policy).

| Discussion of potential effects and relative merits of options | Rank of preference | |
|---|--------------------|----------|
| | Option A | Option B |
| There are no internationally, nationally or locally designated sites for biodiversity or geodiversity in proximity to this site, nor does it overlap with any Impact Risk Zones (IRZs) for the types of development likely to come forward. It is not within a zone suitable for habitat creation, extension or connection, nor is it within proximity to any Biodiversity Action Plan (BAP) Priority Habitats. In this respect, neither option is expected to impact upon the integrity of important sites and habitats for biodiversity and / or geodiversity within the neighbourhood area. Given the site is currently developed, it is not anticipated that redevelopment will negatively impact upon the local biodiversity network. It is acknowledged that both options have the potential to bring forward improvements to the local biodiversity network through on-site green infrastructure enhancements, which will contribute to biodiversity connectivity in the neighbourhood area. | | |
| The significance of the effects of each option on local biodiversity and / or geodiversity largely depends on the design and layout of development and the incorporation of enhancement measures. However, Option B has the potential to bring forward a greater level of enhancement than Option A. This is due to Option B encouraging a mix of uses on the site as opposed to just retail, which could promote more opportunities for green infrastructure enhancements. This would help proposals deliver development in line with Policy 2: Spatial strategy, Policy 12: Design, Policy 23: Natural environment, and Policy 25: Green infrastructure of the Cornwall Local Plan. These policies indicate proposals will be judged on how they will impact upon the biodiversity of the area and work to bring forward biodiversity and geodiversity enhancements, promote biodiversity connectivity, and achieve biodiversity net-gains. This is especially important given the declaration of an ecological emergency by Cornwall Council in 2021. Furthermore, Option B would also have greater potential to achieve biodiversity net-gain in line with national policy. | 2 | 1 |
| Reflecting upon the above, Option B is found to be the most preferable. This reflects the potential of the mixed development to promote greater biodiversity and geodiversity enhancements than Option A. | | |

Table 4.4: Appraisal findings: Climate change and flood risk

Option A: Focus development on retail uses at Fairmeadow Car Park (aligning with existing local policy).

| Discussion of potential effects and relative merits of options | Rank of p | reference |
|---|-----------|-----------|
| Discussion of potential effects and relative ments of options | Option A | Option B |
| With respect to climate change mitigation, both options would bring forward development in a location with good access to sustainable transportation networks. Pavement on the southern site boundary allows for safe walking and cycling opportunities in this part of the town centre and further afield, and the site is within proximity to bus stops and the Redruth rail station to the east. This infrastructure is likely to limit potential increases in CO ₂ emissions by encouraging opportunities to engage with sustainable and active travel. In terms of adapting to the potential effects of climate change, the site is | | |
| completely within Flood Zone 1, and is not affected by surface water flooding. Given the site is already developed, both Option A and Option B are not expected to increase the surface water flood risk. However, there is a large area to the west of the site that is within Flood Zone 2 and Flood Zone 3 and is more susceptible to fluvial flooding. Additionally, Station Road on the southern site boundary is at low risk of surface water flooding. Though it is unlikely this will affect either option, development should be considerate of the flood potential and could incorporate measures to avoid exacerbating it. This could include green infrastructure provision. | | |
| However, Option B is considered to be more favourable than Option A. This is due to the option promoting a range of uses on the site, which supports policy TC3: Diversification of Uses in Town Centres in the Cornwall Council Climate Emergency Development Plan Document (DPD). Diversification of uses in town centre environments help centres become community hubs that support the local population. This reduces the need to travel outside the settlement to access key infrastructure, which aids in lowering CO2 emissions linked to transportation. Additionally, Policy TC3 indicates proposals for development proposals will be supported where they contribute towards an enhanced natural environment (including public realm improvements) and promote sustainable and active transportation access. This will contribute to climate change mitigation strategies on the site. Furthermore, a mix of uses on the site could encourage opportunities to deliver climate change efficiency through design or include more open spaces that could bring forward greater green infrastructure provision. A greater range of uses on site could allow for more scope for climate change resilience measures. This links to national policy drivers including the National Planning Policy Framework, which indicates plans should take a proactive approach to mitigating and adapting to climate change. However, it is acknowledged that the significance of potential effects through Option B is dependent on what uses are brought forward on the site, and the design of the development scheme. | 2 | 1 |
| In conclusion, the effects of Option A and Option B on climate change mitigation and adaptation are largely linked to the design and layout of the development. However, given Option B focuses on bringing forward a range of uses on the site, it is more reflective of the Cornwall Council Climate Change Emergency DPD. Additionally, a mixed-use site has greater potential to bring forward climate change resilience measures. As such, Option B is more favourable than Option A. | | |

Table 4.5: Appraisal findings: Community wellbeing

Option A: Focus development on retail uses at Fairmeadow Car Park (aligning with existing local policy).

| | Rank of n | reference |
|---|-----------|-----------|
| Discussion of potential effects and relative merits of options | Option A | Option B |
| Comprehensive redevelopment of the Fairmeadow Car Park through Option A or Option B is likely to facilitate opportunities for additional community infrastructure. This will benefit the wellbeing of the Redruth residents by providing a range of new facilities, services and opportunities. However, Option B is likely to bring forward a wider range of new opportunities, given the site would be supporting a range of uses. Mixed use development sustains and enhances the vitality and viability of the town centre environment (Policy TC3: Diversification of Uses in Town Centres, from the Cornwall Council Climate Change Emergency DPD), and supports additional sectors that contribute to the local economy. As such, Option B is likely to perform more favourably than Option A, which looks to only bring forward new retail development. | | |
| Both options will complement the redevelopment of the Redruth Buttermarket to the east. This area has been undergoing changes to provide small specialist shops, affordable workspaces, open air markets, entertainment and a range of small food and drink outlets, in order to revive the daytime and evening economies of Redruth. The decision notice ¹⁶ outlines the development will include conservation repairs, demolition of some features to make space for a café structure and a food hall, the inclusion of new staircases and lifts, stall units on the lower floor and the creation of an accessible route through to the Mining Exchange. Additional retail opportunities through Option A would expand the offer for local residents and visitors in Redruth, which would contribute to daytime economy. However, mixed use development through Option B has the potential to deliver wider benefits with respect to the Redruth Buttermarket. The design of development on this site could allow for better connectivity with the accessible route through to the Mining Exchange to other parts of the town centre, and green infrastructure provision could enhance the conservation repairs being undertaken. It is likely the mixed-use development through Option B could support both the daytime and evening economies in Redruth. | 2 | 1 |
| Cornwall Council has secured funding to encourage economic growth in the region, through urban regeneration; planning and land use; skills and enterprise infrastructure; and physical and digital connectivity. Whilst Redruth is not a focus of this project, mixed use development through Option B is likely to align with these aspirations. As such, development through Option B could provide additional opportunities to support this project. | | |
| Both options would allow for access through walking and cycling given the pavement provision on Station Hill to the south and would also allow access to the existing services and facilities in the town centre to the north. This could help encourage active lifestyles, bringing forward benefits for physical and mental health and wellbeing. This will also promote a higher level of social inclusion through ease of accessibility. The quality of the public realm (for example, street furniture, development layout and green infrastructure) is also an important consideration. Whilst this is very much dependent on the design of the adopted development scheme, Option B could have the potential to bring forward a greater level of enhancement given it is focused on town centre regeneration. For example, by supporting a range of uses other than retail, which may support wider public realm enhancements. | | |

¹⁶ Cornwall Council (2021) 'Conditional Approval Decision Notice' can be accessed here.

Upon reflecting on the above, whilst both options would bring forward developments for community wellbeing in the neighbourhood area, Option B is found to be most preferable. This is due to supporting a range of uses on the site as opposed to retail opportunities alone, as well as being more complimentary to the Redruth Buttermarket, which has been undergoing regeneration.

Table 4.6: Appraisal findings: Historic environment

Option A: Focus development on retail uses at Fairmeadow Car Park (aligning with existing local policy).

| | Rank of p | reference |
|--|-----------|-----------|
| Discussion of potential effects and relative merits of options | Option A | Option B |
| This site is within the Cornwall and West Devon Mining Landscape World Heritage Site (WHS) – the Camborne and Redruth with Wheal Peevor and Portreath section. This area of the WHS is regarded as the capital of Cornish mining. The WHS management plan indicates it will be important for new development to add to the quality and distinctiveness of the designation by being of high-quality design and respectful of the setting. Additionally, the site is within the Redruth Conservation Area. As such, it will be important for new development through either Option A or Option B to be sensitive to the special qualities, character and significance of the surrounding built environment. This will help to encourage opportunities for sensitive regeneration whilst improving the understanding and enjoyment of Redruth's heritage. | | |
| This site is within 100m of 21 Grade II listed buildings. Whilst many of them are screened from the site by existing development, several buildings are likely to be directly impacted by development of this site. These are: 4, Penryn Street (HE List Number: 1161960); 2 Station Hill (HE List Number: 1309837); 3 and 4 Station Hill (HE List Number: 1142568); Redruth Buttermarket (HE List Number: 1475141); and Railway viaduct (HE List Number: 1161530). In this context, development of this site through either option has the potential to have impacts on the integrity of a range of historic environment features, including through changes to the setting of these assets. | 2 | 1 |
| Development proposals that come forward through Option A or Option B are likely to lead to heritage impacts. This is due to the location of this site within the wider historic landscape – positioned within the Cornwall and West Devon Mining Landscape WHS and the Redruth Conservation Area, and within proximity to nationally designated listed buildings. As such, development of the site has the potential to influence the setting of assets and the wider historic landscape of Redruth. However, Option B may facilitate opportunities for proposals that support Redruth's heritage, due to its focus on mixed use development. For example, the incorporation of open spaces / public realm enhancements will positively contribute to the setting of the nationally designated listed buildings and the wider historic environment. As such, Option B is found to be more favourable than Option A. It is acknowledged that new development through Option A or Option B should be accompanied by a proportionate heritage assessment. This will provide further details about the heritage significance and sensitivities of the site and could outline mitigation and enhancement measures to ensure and demonstrate the historic environment is fully considered. | | |

Table 4.7: Appraisal findings: Land, soil, and water resources

Option A: Focus development on retail uses at Fairmeadow Car Park (aligning with existing local policy).

Option B: Support a range of uses at Fairmeadow Car Park with a wider focus on town centre regeneration (aligning with emerging national policy drivers).

| | Rank of preference | |
|--|--------------------|----------|
| Discussion of potential effects and relative merits of options | Option A | Option B |
| Both options are looking to bring forward development in an area of Redruth with no likelihood of being best and most versatile (BMV) agricultural land. This is a brownfield site in current use as a car park and has no level of contamination according to the Cornwall Council interactive map. As such, regeneration of this site should be readily achievable. In this way, Option A and Option B are promoting the best use of land by focusing retail development or regeneration away from land better suited for other uses. | | |
| Whilst the Poltreath Stream waterbody is within proximity to the site (located approximately 50m to the west), it is uncertain whether this will be affected by redevelopment through either option. This is due to online mapping resources and satellite imagery suggesting the waterbody flows underground in this part of Redruth. As such it is not possible to differentiate between the options at this stage. | =1 | =1 |
| Whilst Option B may have the potential to promote a wider range of uses on this site (which may facilitate public realm improvements and green infrastructure enhancements), it is currently uncertain whether it would perform more favourably than Option A. This is due to the absence of specific proposals at this stage. As such, both options perform similarly with respect to the land, soil and water resources SEA theme – as they are likely to support opportunities to regenerate an area of brownfield land within the town centre environment. This encourages the most efficient use of land within Redruth. The effects of Option A or Option B on the Poltreath Stream waterbody are unknown. | | |

Table 4.8: Appraisal findings: Landscape and townscape

Option A: Focus development on retail uses at Fairmeadow Car Park (aligning with existing local policy).

| Discussion of potential effects and relative merits of options | Rank of preference | |
|--|--------------------|----------|
| | Option A | Option B |
| With reference to local landscape and townscape, there are no landscape designations overlapping with this site. Nor are there any tree preservation orders (TPOs) within the site boundaries or in proximity to them. As such, development through either option will not impact on landscape designations in this part of the neighbourhood area. | 2 | 1 |
| The options focus on a site located within the built-up area of Redruth and within the town centre environment. As such, regenerating this site is unlikely to cause negative landscape impacts. However, both Option A and Option B have the potential to bring forward positive effects for the townscape. This includes through encouraging development which incorporates materials and design | | |

features which complement the surrounding areas and enhances the views of and into the site. This could be achieved through public realm provision, such as tree and vegetation planting, and considerate landscaping and layouts. In this way, Option B is likely to bring forward greater benefits for the character of the town centre environment due to encouraging a mix of uses. This could likely support a greater variety in building structures and public realm features, which can be more visually appealing and help to break up development. It is noted this is dependent on the design of the scheme taken forward.

Overall, neither option is considered likely to negatively impact the landscape or townscape in this part of Redruth. Given the site is brownfield, redevelopment through both options presents the opportunity to enhance its contribution to the local landscape. It is likely Option B would allow for a greater variety in landscape enhancements due to its focus on promoting a range of uses. As such, it is ranked more favourably than Option A. However, it is noted the potential enhancements to the landscape through either option is dependent on the design of the adopted scheme.

Table 4.9: Appraisal findings: Transportation

Option A: Focus development on retail uses at Fairmeadow Car Park (aligning with existing local policy).

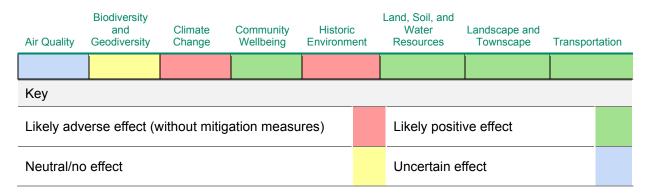
| | Rank of p | reference |
|--|-----------|-----------|
| Discussion of potential effects and relative merits of options | Option A | Option E |
| Both options are looking to bring forward regeneration and development on a car park within the Redruth town centre environment. As such, it is possible that development through either option will increase the use of vehicles in Redruth town centre (to access the new services and facilities), whilst reducing the parking provision in the area. However, given the existing car park is currently underutilised (with the peak occupancy rate being a maximum of 22% Monday-Saturday), redevelopment is unlikely to significantly impact upon parking provision in the town centre. Furthermore, it is noted that car parking provision could be included through either option, however Option B could retain a greater level of car parking capacity than Option A due to its proposed mixed-use development. | | |
| Both options would allow for walking and cycling opportunities through pavement provision on Station Hill to the south. Additionally, there are bus stops approximately 150m to the north-east, and the Redruth rail station is approximately 160m to the north-east. Given the proximity of the site to public transport network, significant increases in traffic movements are unlikely under either option. | =1 | =1 |
| Both options seek to bring forward development in an area with sustainable and active travel links. As such, development through either option will likely have positive impacts. Option A will encourage retail uses in accessible locations, whilst Option B would encourage a greater range of uses that could support wider public realm and connectivity improvements. As such, they are found to be equally favourable. | | |

Summary of assessment findings

Brewery Site

- 4.23 A summary of the findings is presented in **Table 4.10** below. This provides an indication of how the site has performed in relation to each of the SEA themes, with the colouring as follows:
 - **Green:** likely positive effects resulting from an allocation at this location.
 - **Yellow:** likely to be limited or no effects resulting from an allocation at this location.
 - **Blue:** likely to be uncertain effects resulting from an allocation at this location (i.e., there are constraints, but the effects are perhaps dependent or influenced on the design and mitigation measures which could brought forward as part of a proposal).
 - Red: likely negative effects resulting from an allocation at this location.

Table 4.10: Summary of assessment findings for the Brewery Site



- 4.24 The appraisal findings highlight that 'uncertain effects' and 'likely negative effects' are likely under one or more SEA themes, particularly in relation to climate change and the historic environment. Proposals for the redevelopment of the Brewery Site will need to demonstrate how the concerns and constraints to development at this location will be appropriate addressed.
- 4.25 In the context of the above, the draft plan appraisal findings (i.e., the next stage of the SEA), has considered the extent to which the emerging RNP policies and proposals address any constraints at this location, including with respect to mitigation and enhancement measures. The draft plan appraisal findings are presented in **Chapter 5** of this Environmental Report.

Fairmeadow Car Park

4.26 Both options would encourage redevelopment of a site within the Camborne, Pool and Redruth AQMA. Redevelopment of the site could encourage greater numbers of vehicles travelling through Redruth and increase vehicle idling – both of which will impact on local air quality through increased emissions and pollutants being released. However, both options could incorporate parking provision and mitigation measures to improve local air quality. This could include green infrastructure to absorb pollutants. As parking provision and mitigation strategies are dependent on the adopted scheme, both options are concluded to perform similarly.

- 4.27 In terms of potential effects on local biodiversity and/or geodiversity, the significance is largely dependent on the design and layout of the adopted scheme. This includes the incorporation of enhancement measures such as green infrastructure, which will contribute to biodiversity connectivity in the area. However, Option B has the potential to bring forward a greater level of enhancement. This is due to promoting a range of development, which is more in line with Cornwall Local Plan policies linked to green infrastructure.
- 4.28 Both options seek to bring forward development in an accessible location in terms of sustainable and active transportation, and on a site that is at low risk of fluvial flooding and no risk of surface water flooding. However, Option B is concluded to be more favourable than Option A due to promoting a range of uses on the site, which supports the Cornwall Council Climate Emergency DPD. A diversification of uses in the town centre will help the community reduce the need to travel to access key infrastructure, which will help to lower CO₂ emissions linked to transport. Additionally, a more diverse development has a greater potential to contribute to natural environment enhancements and promote sustainable and active transportation. It is noted that the significance of effects through either option is dependent on the design of the scheme.
- 4.29 Whilst development through Option A or Option B will likely facilitate opportunities for additional community infrastructure, Option B has the potential to bring forward a wider range of opportunities. This reflects the promotion of mixed-use development under this option. Furthermore, mixed use development through Option B is also more likely to compliment the redevelopment of the Redruth Buttermarket to the east. This includes through enhancing connectivity to promote accessibility to the site, and green infrastructure provision to enhance the repairs being undertaken. It is noted these enhancements are dependent on the design of the scheme taken forward. Mixed use development under Option B could also support urban regeneration projects being undertaken by Cornwall Council, and has the potential to bring forward a greater level of public realm enhancement than Option A. Given this, Option B is more favourable for community wellbeing.
- 4.30 Option B is also concluded to be more favourable for the historic environment. The site is within the Cornwall and West Devon Mining Landscape WHS and the Redruth Conservation Area, and in proximity to 21 nationally designated listed buildings. Whilst development of the site through either option has the potential to impact on the integrity of these designations, Option B may facilitate opportunities for proposals that support Redruth's heritage. This is due to its focus on mixed use development, which could incorporate open spaces or public realm improvements, which will positively contribute to the setting of these historic environment designations. It is noted that development through either option should be accompanied by a proportionate heritage assessment to provide further details about the heritage significance and sensitivities of the site and outline potential mitigation measures.
- 4.31 Both options seek to bring forward development on a currently developed brownfield site that is located in the Redruth town centre. As such, both options promote the best use of available land. Whilst it is acknowledged the site is in proximity to the Poltreath Stream waterbody, it is uncertain whether redevelopment will affect this feature, as it is possible it flows underground in this part of Redruth. Both options have the potential to facilitate public realm

- improvements and green infrastructure enhancements, which would contribute to the land, soil, and water quality. However, this is dependent on the design scheme taken forward. As such, it is uncertain whether Option B would perform more favourably than Option A.
- 4.32 In terms of landscape and townscape, it is likely Option B will perform more favourably. Whilst both options focus on regenerating a site and could bring forward benefits to the surrounding townscape (for example, through incorporating materials and design features which complement the surrounding development / areas), Option B could bring forward greater benefits due to encouraging a mix of uses. This option could support a greater variety in building structures and public realm improvements, which can be more visually appealing. However, it is acknowledged that the landscape and townscape benefits of development will be dependent upon the design of the scheme.
- 4.33 Both options perform similarly in terms of transportation. The site is currently a car park that is underutilised as such, redevelopment is unlikely to significantly impact upon parking provision in the Redruth town centre. Additionally, the site would allow for walking and cycling opportunities through pavement provision and is in proximity to the public transport network. As such, significant increases in traffic movements through either option are unlikely. Given this, the options cannot be differentiated between.
- 4.34 On balance, Option B, through encouraging a range of uses at Fairmeadow Car Park, may help to enable the 'win-win- opportunities associated with the effective planning of key areas within the town centre environment to be realised.

Developing the preferred approach

- 4.35 The RNP does not allocate sites for development due to meeting its housing target through existing commitments and completions, and via strategic allocations within the Site Allocations DPD. However, the SEA has explored the relative sustainability merits associated with two opportunity sites within the neighbourhood area to inform key policy approaches for the RNP.
- 4.36 The preferred approach for the opportunity sites has been informed by the various surveys and evidence base documents prepared to support the RNP (to date), responses from community consultation events, and the SEA findings.
- 4.37 The RNP supports the principle of redeveloping the Brewery Site. Establishing a preferred development option for the site will be informed by the ongoing masterplanning work which is being completed by Cornwall Council.
- 4.38 At Fairmeadow Car Park, the RNP seeks to encourage a range of uses to support opportunities for town centre regeneration (**Option B**). It is anticipated that this will help to enable the 'win-win' opportunities associated with the effective planning of key areas within the neighbourhood area to be realised. Contributing factors include the changing nature of town centres in response to the pandemic, and complementing the proposed uses and regeneration of the Buttermarket which is adjacent to the Car Park. Although the site is currently safeguarded for retail uses within the Cornwall Local Plan, engagement with Cornwall Council has highlighted support for expanding the range of acceptable uses at this location.

5. Appraisal of the Regulation 14 version of the Redruth Neighbourhood Plan

Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the Regulation 14 version of the RNP. This chapter presents:
 - An appraisal of the current version (i.e., the Regulation 14 version) of the RNP under the eight SEA theme headings.
 - The overall conclusions at this current stage.

Redruth Neighbourhood Plan policies

5.2 The draft RNP contains 26 policies, group under nine themes. These are listed in **Table 5.1** below.

Table 5.1: RNP policies

| Policy Reference | Policy Name |
|---------------------------------|---|
| Climate change | |
| CC1 | Supporting Cornwall Climate Change DPD |
| Design Code | |
| DC1 | Supporting Existing Design Code for Redruth |
| DC2 | Supporting Development of a Redruth Shopfront Design Code |
| Historic Environment and Herita | age Assets |
| H1 | Supporting Redruth's World Heritage Site Status |
| H2 | Development and Heritage |
| H3 | Established Historic Pathways and Openways |
| H4 | Linking Mining Assets to the Town Centre |
| Housing | |
| HS1 | The Development Boundary |
| HS2 | HAPPI Principles for Development in Redruth |
| HS3 | Affordable Housing Led Schemes |
| HS4 | Mixed Development Schemes |
| HS5 | Conversion of Residential Garages |
| Town Centre | |
| T1 | Town Centre Vision for Redruth |
| T2 | Primary Retail Frontage |
| T3 | Upper Floors and the Rear of Town Centre Buildings |
| T4 | Fair Meadow Retail Allocation Review |

| Policy Reference | Policy Name |
|------------------------------|---|
| T5 | Redruth Brewery Site Re-Development |
| Redruth Employment Sites (Ou | tside the Town Centre Boundary) |
| BE1 | Safeguarding and Enhancement of Employment Land |
| BE2 | New Business Development |
| Transport | |
| TR1 | Improving Cycling and Walking Routes |
| TR2 | Tolgus Trail Phase 2 |
| TR3 | Provision for Public Electric Vehicle Charging Points |
| Green Infrastructure | |
| GI1 | Support for the CPIR Green Infrastructure Strategy |
| GI2 | Safeguard and Enhance Green Spaces within the Town Development Boundary |
| Health | |
| HE1 | Future Health Provision |
| HE2 | Dentist Provision |

Approach to this appraisal

- 5.3 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.2**) as a methodological framework.
- 5.4 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.
- 5.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. 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 RNP 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.

Air quality

5.6 Fairmeadow Car Park sits within the Camborne, Pool and Redruth Air Quality Management Area (AQMA). Redevelopment of the site has the potential to impact local air quality as the loss of part of the car park could increase vehicular movement elsewhere as residents seek out alternative parking

- opportunities, which could include on-street parking, which could lead to increasing congestion. However, it is recognised that the car park is currently underoccupied, with a maximum occupancy rate of 22%. Therefore, increased vehicular movement as a result of the redevelopment of the site is unlikely. Furthermore, Policy T4 (Fair Meadow Retail Allocation Review) outlines that the site will include a cycle hub, which will have positive implications for air quality, incentivising modal shift and reducing private vehicle use in the AQMA.
- 5.7 The Brewery Site is also within the Camborne, Pool and Redruth AQMA. Redevelopment of this site could lead to increased traffic on local road network, and a subsequent increase in pollutants. However, any effects in this respect will be dependent on the use of the site, which is not clear at this stage. Whilst the site is located just outside of the town centre boundary, approximately five minutes on foot, it is currently physically disconnected from the town centre. This is because there is no footpath along the site to the side of Chapel Street, and there is a lack of safe crossing points. In response to this, the RNP outlines that access to the site via all modes of transport needs to be considered in the design stage.
- 5.8 Whilst both opportunity sites are located within the Camborne, Pool and Redruth AQMA, it is noted that the AQMA covers the entire built-up area of Redruth. In this respect, to locate development outside of the AQMA would mean locating it in the open countryside, away from the services, facilities and amenities in the town centre, which would encourage private vehicle use. Therefore, whilst the opportunity sites are located within the AQMA, this location provides access to services, facilities and amenities and public transport hubs via active travel.

Biodiversity and geodiversity

- 5.9 Given the proximity of the neighbourhood area to internationally and nationally designated sites for biodiversity and geodiversity, a Habitats Regulation Assessment (HRA)¹⁷ process has been completed for the Neighbourhood Plan. Providing any recommendations within the HRA are incorporated into the submission version of the RNP, it is anticipated that there would be no adverse effects to the integrity of these sites, either alone or in-combination with other plans and projects.
- 5.10 With respect to the opportunity sites identified within the RNP, Fairmeadow Car Park is relatively unconstrained from a biodiversity and geodiversity perspective. Hence, redevelopment of the site is unlikely to impact upon the integrity of important sites and habitats for biodiversity and / or geodiversity. Given the site is currently comprises a car park, redevelopment is unlikely to negatively impact upon the local biodiversity network. Rather, by encouraging a range of uses on the site through Policy T4, redevelopment could lead to opportunities for green infrastructure enhancements. In turn, this could lead to greater potential to exceed biodiversity net gain (BNG) requirements.
- 5.11 Similarly, the Brewery Site is also relatively unconstrained from a biodiversity and geodiversity perspective. However, there is an area of deciduous woodland approximately 80m southwest of the site. Therefore, redevelopment

¹⁷ AECOM (2023) – HRA Report' The HRA contributes to the evidence base for the Neighbourhood Development Plan, available to view alongside the additional Regulation 14 consultation documents.

of the site could impact upon this habitat through increased sound and light pollution during both construction and occupation, as well as increased recreational disturbance during occupation. Whilst the site is 80m from this habitat, existing trees and hedgerows within the site and along the site boundaries to the west, south and east extend southwards and connect to this habitat. As such, redevelopment of the site could adversely impact ecological networks, leading to habitat fragmentation, through the removal of green infrastructure. It is noted that design criteria for the site does not mention green infrastructure or biodiversity, which is a key aspect of securing good design.¹⁸ It is anticipated that these considerations will be appropriately reflected through the masterplanning work for the site which is being led by Cornwall Council.

5.12 More broadly with respect to safeguarding and enhancing ecological networks within the neighbourhood area, Policy GI1 (Support for the CPIR Green Infrastructure Strategy) supports the Camborne, Pool, Illogan and Redruth (CPIR) Green Infrastructure Strategy proposals for Redruth. This includes increasing tree planting and biodiversity and properly planning green infrastructure in new development. This should ensure that any development proposals which come forward during the plan period retain and enhance existing trees and hedgerows, contributing towards ecological connectivity.

Climate change

- 5.13 With respect to climate change mitigation efforts, the following considerations are relevant to the opportunity sites identified within the RNP:
 - Fairmeadow Car Park has good access to sustainable transportation networks. A footpath on the southern site boundary allows for safe walking and cycling access to the surrounding town centre and areas further afield, and the site is within proximity to bus stops and Redruth Railway Station to the east. This is likely to limit potential increases in greenhouse gas (GHG) emissions as a result of redevelopment by encouraging active travel and the use of public transport. By promoting a range of uses, the site could help the town centre become a community hub that support the local population, which in turn would reduce the need for residents to travel outside the settlement. Moreover, promoting a range of uses could encourage opportunities to deliver climate change efficiency through design, or include more open spaces that could bring forward greater green infrastructure provision. This could lead to greater scope for climate change resilience measures.
 - The redevelopment of Redruth Brewery could lead to increases in GHG emissions, but this is dependent on the use of the site, which is uncertain at this stage. This increase could come from the construction phases; the growth of the built footprint of Redruth; and / or an intensification of use at the site. However, uses such as open space would not lead to as much of an increase in GHG emissions compared to residential development or parking provision. In addition, as this site is already developed and partially in use, it is unlikely that redevelopment of the site will result in large increases in GHG emissions. Whilst access to the town centre is currently

¹⁸ https://www.gov.uk/government/publications/national-design-guide

unsecure, it is likely that this would need to be resolved as a requisite for development.

- 5.14 In terms of adapting to the effects of climate change, the following considerations are relevant to the opportunity sites identified within the RNP:
 - Fairmeadow Car Park is completely within Flood Zone 1 and is not affected by surface water flooding. Given the site is currently used as a car park, redevelopment of the site is not expected to increase surface water flood risk in this location. However, it is noted that a large area to the west of the site is within Flood Zones 2 and 3. In addition, Station Road on the southern boundary of the site is at low risk of surface water flooding. Nevertheless, redevelopment of the site has the potential to reduce flood risk in these locations by delivering a level of green infrastructure.
 - Most of the Brewery Site is within Flood Zones 2 and 3, associated with the watercourse running through the site. The site also contains some areas of high surface water flood risk potential also likely linked to the watercourse running through the site. The areas at increased risk of surface water flooding are found adjacent to the road on the northern site boundary, extending southwards to the Kresen Kernow building and other structures to the east, as well as in the middle of the site. Whilst the use of sustainable drainage systems (SuDS) and green infrastructure could help mitigate surface water flood risk, this will depend on the use of the site.
- 5.15 More broadly with respect to responding to the climate crisis, Policy CC1 (Supporting Cornwall Climate Change DPD) of the RNP outlines that the council supports the policies within Cornwall Council's Climate Emergency Development Plan Document (DPD). This includes, amongst other considerations, delivering development in the most sustainable locations; contributing towards decarbonisation; and improving the resilience of communities. This is in line with the following objective of the RNP: "The RNP should support Cornwall Council's Climate Change DPD". This is further reflected through Policy BE2 (New Business Development), which outlines that proposals for new and expanding businesses will be supported where they align with the aims of the Climate Emergency DPD.
- 5.16 The RNP also outlines policies within the Climate Emergency DPD that apply to the neighbourhood area. This includes Policy SEC1 (Sustainable Energy and Construction Development), which requires proposals to demonstrate how they have implemented the principles and requirements set out with the policy. In terms of climate change adaptation, Policy CC3 (Reduction of Flood Risk) states that proposals will need to be designed to reduce flood risk to the site and its surroundings. In addition, Policy CC4 (Sustainable Drainage System Design) requires proposals to prioritise the use of SuDS, including within existing town centres, commercial and retail areas.

Community wellbeing

5.17 The housing allocation for the neighbourhood area has already been met through a combination of existing completions and commitments (i.e., sites which have already been developed, or sites which already have planning approval but have not yet come forward), and through strategic site allocations within the Site Allocations DPD. In this respect, the RNP does not allocate sites

for development. Nonetheless, there is a strong focus through the RNP on ensuring that new development areas deliver high-quality and sustainable designs which respect the unique character of the neighbourhood area. Additionally, there is a strong focus on regeneration, supporting proposals to improve the economic and community vitality of Redruth.

- 5.18 For example, it is recognised there are opportunities for brownfield and regeneration development in the neighbourhood area, recognised by the identification of opportunity sites at Fairmeadow Car Park and the Brewery.
 - The redevelopment Fairmeadow Car Park is likely to facilitate opportunities for additional community infrastructure as the RNP supports a range of uses at this location. This will benefit the wellbeing of the residents of Redruth by providing a range of new facilities, services, and amenities. Notably, mixed-use development will help sustain and enhance the vitality and viability of the town centre and support additional sectors that contribute to the local economy. The redevelopment of the site has the potential to complement the regeneration of the adjacent Buttermarket. Additionally, a footpath on the southern site boundary allows for safe walking and cycling access to the surrounding town centre and areas further afield. This will help encourage active lifestyles, bringing forward benefits for physical and mental health. This will also promote a higher level of social inclusion through ease of accessibility.
 - The Brewery Site is just outside of the town centre boundary, and therefore access to services, facilities, and amenities in the town centre via walking, cycling and public transport is possible. However, access to the town centre is currently fragmented, although it is noted that this would likely need to be resolved as a requisite for development. Whilst the use of the site is unknown at this stage (subject to ongoing masterplanning work by Cornwall Council to establish a preferred option for the site), the size of the site could facilitate a range of housing types and tenures, including affordable housing provision, if residential development was incorporated into the proposals. In addition, the redevelopment of the site could bring forward significant public realm enhancements through sensitive design and / or expanding existing on-site community uses.
- 5.19 More broadly, and with a focus on housing, Policy HS4 (Mixed Development Schemes) supports mixed tenure schemes provided they can demonstrate that a) they meet a local need for housing; and b) affordable homes are prioritised for those with a local connection to the area. In addition, where mixed tenure schemes are delivered in full or in part on brownfield sites, a reduced proportion of affordable housing will be supported providing there is evidence of prohibitive abnormal costs. This might include, for example, a result of remediation works on contaminated land. In relation to this, Policy HS3 (Affordable Housing Led Schemes) supports housing schemes which meet an identified local affordable housing need where they are in line with Cornwall Council's Local Plan and Design Guide. The policy outlines that affordable housing may differ from open market provision where it is demonstrated to meet an identified local need. Furthermore, Policy HS2 supports development which follows the principles set out within Housing our Aging Population Panel for Innovation (HAPPI). These principles are based on ten key design criteria which broadly cover good

¹⁹ Housing LIN (no date): 'Housing our Aging Population Panel for Innovation (HAPPI)', [online] available to access via this link

- design, with a particular focus on the housing need of older people. This includes adaptability, to reflect peoples' changing needs as they age.
- 5.20 With respect to supporting the economic vitality of the neighbourhood area, Policy T1 (Town Centre Vision for Redruth) outlines the RNP's support for the Redruth Town and World Heritage Site Spatial Vision and Investment Plan. Policy T2 (Primary Retail Frontage) permits other commercial uses, including leisure and service uses, at the Primary Retail Frontage. In addition, Policy BE2 (New Business Development) supports proposals for new and expanding businesses which align with the aims of the Cornwall Strategic Economic Plan; Climate Change DPD; or deliver attractive and adaptable spaces suitable for a wide range of modern manufacturing, innovation, and evolutionary processes.
- 5.21 Further supporting the economic vitality of the neighbourhood area, Policy BE1 (Safeguarding and Enhancement of Employment Land) safeguards existing employment sites Parc Erissey (E13) and Krowji (E14) in accordance with Policy 5 (Business and Tourism) of the Cornwall Local Plan. These sites will only be released if a) it can be demonstrated that the use of the premises for the existing / a new commercial use is not viable; or b) the proposed alternative use would provide equal or greater benefits for the local economy and community than its current use. In addition, Policy BE1 supports the redevelopment and / or enhancement of employment uses on existing sites to provide upgraded premises and improved environment, subject to there being no significant detrimental impact on adjoining residential areas.
- 5.22 With a focus on public open / green spaces and community / recreational facilities, Policy GI1 (Support for the CPIR Green Infrastructure Strategy) supports the Camborne, Pool, Illogan and Redruth (CPIR) Green Infrastructure Strategy proposals for Redruth. This includes setting out where short, medium, and long-term improvements will be prioritised with regards to parks and amenity sites; public sports and leisure sites; play spaces; youth provisions; allotments; cemeteries and churchyards; and natural green spaces. The policy also encourages the delivery of community orchards or gardens in appropriate locations, as Redruth does not currently have either of these amenities. In addition, green spaces within the town development boundary are designated through Policy GI2 (Safeguard and Enhance Green Spaces within the Town Development Boundary). The policy outlines that infill development will only be permitted where there is no loss to the character and amenity of these sites and surrounding area, amongst other criteria. These policies will support the physical and mental health and wellbeing of residents.

Landscape and townscape

- 5.23 The key landscape and townscape considerations for the opportunity sites identified within the RNP are presented below:
 - Fairmeadow Car Park is relatively unconstrained from a landscape perspective, as it is located within the town centre. In addition, redevelopment of the site has the potential to lead to positive impacts on townscape character, including its setting, by regenerating the currently underutilised, unattractive car park at this location. This could include the use of space, materials and design features which complement the surrounding area and enhance the views out of / into the site. By

- encouraging a range of uses, redevelopment is likely to bring forward greater benefits for the character of the town centre. This includes supporting a greater variety in building structures and public realm features, which can be more visually appealing and help to break up development.
- The Brewery Site is a brownfield site located within the built-up area of Redruth, not far from the town centre. Whilst the redevelopment of the site is unlikely to lead to adverse impacts on landscape character, it could influence townscape character, including views to / from surrounding residential development and other buildings. However, it is acknowledged that the landscape and townscape benefits of development will be dependent upon the design of the scheme, which is unknown at this stage. In addition, the site is relatively flat, with a slight incline to the east / southeast. In this respect, views are unlikely to be impacted. There is a level of screening along the northern boundary of the site from trees and hedgerows. If this is retained, this will further limit potential impacts on views to / from surrounding residential development and other buildings.
- 5.24 In order to preserve landscape and townscape character, Policy GI2 (Safeguard and Enhance Green Spaces within the Town Development Boundary) of the RNP designates green spaces within the town development boundary. The policy outlines that infill development will only be permitted where there is no loss to the character and amenity of these sites and surrounding area; where the scale and mass of development respects the character of the area and surrounding properties; and where significant features of the historic and natural environment are preserved, or in exceptional circumstances, restored. In this respect, the opportunity sites are unlikely to lead to any adverse impacts on their surroundings.
- 5.25 More broadly, Policy BE2 (New Business Development) supports proposals for new and expanding businesses in rural areas providing that it is located within or adjacent to existing groups of buildings or on previously development land; and the scale, form, bulk, and general design is appropriate to its location. With respect to proposals for extensions, the scale, design, and use of materials must retain the existing character of the building and relate to its surroundings.

Historic environment

- 5.26 The key heritage sensitivities associated with the opportunity sites within the RNP (and how these have been considered through policy provisions) are presented below:
 - Fairmeadow Car Park is located within the Cornwall and West Devon Mining Landscape World Heritage Site (WHS). In addition, the site is within the Redruth Conservation Area. In terms of nationally designated heritage assets, the site is within 100m of 21 grade II listed buildings. Whilst many of these buildings are screened from the site by existing development, several buildings are likely to be directly impacted by the redevelopment of this site. These are: '4, Penryn Street', '2 Station Hill', '3 and 4 Station Hill', 'Redruth Buttermarket', and 'Railway Viaduct'. However, as the RNP supports a range of uses on the site, redevelopment could lead to proposals that support Redruth's heritage and improve the setting of these assets. For example, the incorporation of open spaces / public realm enhancements will positively contribute to the setting of the nationally

- designated listed buildings and the wider historic environment. A level of uncertainty therefore exists at this stage.
- The Brewery Site is also located within the Cornwall and West Devon Mining Landscape WHS. In addition, the site is largely within the Plain-An-Gwarry Conservation Area and is also approximately 100m northwest of the Redruth Town Centre Conservation Area. In terms of nationally designated heritage assets, there is one grade II listed building within 100m of the site '5 Chapel Street' to the southeast however this is screened from the site by existing development. In addition, the site currently hosts the Kresen Kernow, which is the home of Cornwall's archives. As the use of the site is currently unknown, it is difficult to predict how redevelopment will impact the historic environment in this location. Nevertheless, Policy T5 (Redruth Brewery Site Redevelopment) outlines that a Heritage Impact Statement will be required as part of the redevelopment of the site. In addition, Chymbla House which is an important aspect of the WHS may be restored depending on viability; and the views to Kresen Kernow will need to be preserved.
- 5.27 With further respect to the heritage sensitivities identified above, the RNP contains several objectives that focus on the historic environment and heritage assets. For example, one of these objectives outlines that future development should recognise the WHS status of Redruth. Another objective outlines that heritage assets must be safeguarded and conserved, and the local character of the historic environment enhanced. This is in addition to established pathways and openways. Non-designated heritage assets form another objective, which highlights that they should be recognised and afforded protection in addition to designated assets.
- 5.28 More broadly, Policy BE2 (New Business Development) supports proposals for new and expanding businesses that involve the conversion or change of use of a listed building providing that the proposal is in accordance with Policy 24 (Historic Environment) of the Cornwall Local Plan. Moreover, Policy GI2 (Safeguard and Enhance Green Spaces within the Town Development Boundary), which designates green spaces within the town development boundary, outlines that infill development will only be permitted where significant features of the historic and natural environment are preserved, or in exceptional circumstances, restored, amongst other criteria.

Land, soil, and water resources

5.29 The RNP identifies two opportunity sites which are supported in principle within the RNP, at Fairmeadow Car Park and the Brewery Site. As both sites are areas of brownfield land, the regeneration of these areas will support the most efficient reuse of previously developed land within the neighbourhood area. However, given the former uses on the sites, it is possible that these areas may contain areas of contaminated land which may reduce the viability of bringing these sites forward. Additionally, the regeneration of the Brewery Site should consider the potential impacts to the Portreath Stream which passes through the site boundary. It is anticipated that these factors will be considered in the ongoing masterplanning work for the Brewery Site which is being completed by Cornwall Council.

Transportation

- 5.30 Two of the objectives of the RNP focus on transportation. The first relates prioritising improving cycling and walking routes over the plan period, and the second relates to creating a safe pedestrian and cycle route between Redruth and Portreath. In relation to this, Policy TR2 (Tolgus Trail Phase 2) outlines the council's support for extending the Tolgus Trail route to Redruth Town Centre. This is because it would encourage and enable both residents and tourists to travel to and from Portreath without a car. The policy recognises that this route has a number of employment sites along it and connects to Redruth School.
- 5.31 With a focus on active travel, Policy TR1 (Improving Cycling and Walking Routes) outlines that cycling and walking route improvements should be prioritised over road improvements, with the exception of road maintenance and safety improvements. In addition, the policy states that where a disused railway line passes through a development site and has the potential for rail reuse, or to form part of Cornwall's walking and cycling green network, developers will be required to incorporate this as part of their application or provide an acceptable alternative. Also of relevance to active travel is Policy GI1 (Support for the CPIR Green Infrastructure Strategy), which supports the Camborne, Pool, Illogan and Redruth (CPIR) Green Infrastructure Strategy proposals for Redruth. This includes supporting improved pedestrian and cycle routes to connect key destinations and offer a viable, attractive alternative to using the car.
- 5.32 With respect to the opportunity sites identified within the RNP, both are located within relative proximity to public transport networks. However, it is recognised that pedestrian connectivity between the Brewery Site and the wider town centre environment could be improved. It is anticipated that this will be considered as part of the ongoing masterplanning work for the site which is being completed by Cornwall Council.

Conclusions at this current stage of plan making

Air quality

5.33 Overall, given both opportunity sites are located within / within proximity to the town centre, accessible to services, facilities and amenities and public transport infrastructure via walking and cycling, they perform favourably. However, as the sites are within the boundaries of the Camborne, Pool and Redruth AQMA, air quality impacts will be dependent on the design of the schemes which come forward at these locations (e.g., the incorporation of green infrastructure enhancements or opportunities to enhance active travel). Uncertain effects are anticipated with respect to the air quality theme at this stage.

Biodiversity and geodiversity

5.34 Given the proximity of the neighbourhood area to internationally and nationally designated sites for biodiversity and geodiversity, a Habitats Regulation Assessment (HRA)²⁰ process has been completed for the Neighbourhood Plan. Providing any recommendations within the HRA are incorporated into the

²⁰ AECOM (2023) – HRA Report' The HRA contributes to the evidence base for the Neighbourhood Development Plan, available to view alongside the additional Regulation 14 consultation documents.

- submission version of the RNP, it is anticipated that there would be no adverse effects to the integrity of these sites, either alone or in-combination with other plans and projects.
- 5.35 The opportunity sites with the exception of the area of deciduous woodland near the Brewery Site locate development away from designated sites and habitats and perform favourably in this respect. Recognising that higher level policy provisions will also provide protection, **no significant effects** are predicted at this stage.

Climate change

- 5.36 Whilst the identified opportunity sites are located within the built-up area of Redruth, within / near the town centre, the Brewery Site is currently disconnected from the town centre (in terms of pedestrian connectivity) and has significant flood risk issues. Nevertheless, the policy framework of the RNP supplement and reinforce the policies within the Climate Emergency DPD, which support sustainable development and mitigation measures for flooding.
- 5.37 On balance, given the use of the Brewery Site is unknown at this stage (informed by the ongoing masterplanning work by Cornwall Council to establish a preferred development option), **uncertainty** is noted with regards to implications on climate change.

Community wellbeing

- 5.38 The housing allocation for the neighbourhood area has already been met through a combination of existing completions and commitments (i.e., sites which have already been developed, or sites which already have planning approval but have not yet come forward), and through strategic site allocations within the Site Allocations DPD. In this respect, the RNP does not allocate sites for development.
- 5.39 Nonetheless, there is a strong focus through the RNP on ensuring that new development areas deliver high-quality and sustainable designs which respect the unique character of the neighbourhood area. Additionally, there is a strong focus on regeneration, supporting proposals to improve the economic and community vitality of Redruth. For example, it is recognised there are opportunities for brownfield and regeneration development in the neighbourhood area, recognised by the identification of opportunity sites at Fairmeadow Car Park and the Brewery Site.
- 5.40 Whilst the preferred development option for Brewery Site in unknown at this stage, it is anticipated that the constraints and opportunities for the site will be appropriately reflected through the ongoing masterplanning work which is being completed by Cornwall Council. As the RNP recognises that supports a range of uses at Fairmeadow Car Park, this will benefit the local community and economy (complementing the redevelopment of the Buttermarket).
- 5.41 The policy framework also addresses a broad range of topics of relevance to community wellbeing, including housing; retail; employment; health; and local amenities, such as public open / green space and recreational facilities. On balance, **major significant positive effects** are still considered likely as a result of the policies and proposals within the RNP.

Landscape and townscape

5.42 Policies and proposals within the RNP are not considered likely to lead to any adverse impacts on landscape or townscape character. Sensitive redevelopment and regeneration of the opportunity sites is likely to avoid adverse effects on local views and amenity. The wider policy framework also performs positively in this respect, setting plan area wide guidance for future development to ensure proposals complement the existing town centre, and protect local green spaces. In light of these considerations, **minor positive significant effects** are anticipated for this SEA theme.

Historic environment

5.43 Whilst the opportunity sites are in historically sensitive locations, it is recognised that **regeneration and redevelopment of the sites has the potential for mixed effects** on heritage assets and areas. For example, as the opportunity sites are currently underutilised areas of brownfield land, the design of new development areas presents an opportunity to improve the setting of nearby heritage assets and conservation areas, and reinforce the significance of the WHS. Nevertheless, this is largely dependent on the design and layout of development, which is currently unknown. Whilst the policy framework seeks to protect heritage assets and the wider historic environment, taking a precautionary approach, **uncertainty** is concluded at this stage.

Land, soil, and water resources

- 5.44 The RNP identifies two opportunity sites which are supported in principle for redevelopment, at Fairmeadow Car Park and the Brewery Site. As both sites are areas of brownfield land, regeneration of these areas will support the most efficient reuse of previously developed land within the neighbourhood area.
- 5.45 However, given the former uses on the sites (particularly the Brewery Site), it is possible that these areas may contain areas of contaminated land which may reduce the viability of bringing these sites forward. Additionally, the regeneration of the Brewery Site should consider the potential impacts to the Portreath Stream which passes through the site boundary. It is anticipated that these factors will be considered in the ongoing masterplanning work for the Brewery Site which is being completed by Cornwall Council.
- 5.46 **No significant impacts** are anticipated for the SEA theme at this stage.

Transportation

5.47 Overall, the policies within the RNP work to improve transportation and movement in the neighbourhood area, by implementing policies that support active travel and public transport use. **Minor positive effects** are anticipated with respect to the transportation theme.

6. Next steps

Plan finalisation

- 6.1 This Environmental Report accompanies the RNP for Regulation 14 consultation. Following consultation, any representations made will be considered by the Steering Group, and the RNP and Environmental Report will be updated as necessary. The updated and final version of the Environmental Report will then accompany the RNP for submission to the local authority, Cornwall Council, for subsequent Independent Examination.
- 6.2 At Independent Examination, the RNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.
- 6.3 If the Independent Examination is favourable, the RNP will be subject to a referendum, organised by Cornwall Council. If more than 50% of those who vote agree with the RNP, then it will be 'made'. Once made, the RNP will become part of the Development Plan for the town.

Monitoring

- 6.4 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 RNP to identify any unforeseen effects early and take remedial action as appropriate.
- 6.5 It is anticipated that monitoring of effects of the RNP 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 RNP that would warrant more stringent monitoring over and above that already undertaken by Cornwall Council.

Appendix A SEA Scoping – Context review and baseline information

A.1 Air quality

Policy Context

Key messages from the National Planning Policy Framework (NPPF)²¹ include:

- 'Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.'
- 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.'
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

The Air Quality Standards Regulations 2010 transpose into UK law the Ambient Air Quality Directive (2008/50/EC) which sets legally binding limits for outdoor concentrations of major air pollutants which impact public health.

Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'²² sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 'Clean Air' and the policies contained within 'Chapter 4: Increasing resource efficiency and reducing pollution and waste' within the 25-year plan directly relate to the air quality SEA theme.

The government published the 'UK plan for tackling roadside nitrogen dioxide concentrations' in July 2017.²³ This is the air quality plan for bringing nitrogen dioxide within statutory limits in the shortest possible time. The plan identifies that "the link between improving air quality and reducing carbon emissions is particularly

²¹ HM GOV (2018): 'Revised National Planning Policy Framework', [online] available to access via: https://www.gov.uk/government/collections/revised-national-planning-policy-framework

²² HM GOV (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

environment-plan.pdf

23 DEFRA (2017) 'UK plan for tackling nitrogen dioxide concentrations' [online], available from:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-planoverview

important" and that consequently the UK government is determined to be at the forefront of vehicle innovation by making motoring cleaner.

The Clean Air Strategy 2019 identifies how government will tackle all sources of air pollution and is aimed at complementing the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan. The strategy proposes new goals to cut public exposure to particulate matter pollution and sets out the comprehensive action that is required from across all parts of government and society to meet these goals. The proposed measures include new legislation and new local powers to take action in areas with an air pollution problem, including through the creation of 'Clean Air Zones'.

In February 2020, the UK government updated the Clean Air Zone²⁴ Framework²⁵, which sets out the principles for the operation of Clean Air Zones England and provides the expected approach to be taken by local authorities when implementing and operating a Clean Air Zone. Clean Air Zones bring together local measures to deliver immediate action to improve air quality and health with support for cities to grow while delivering sustained reductions in pollution and a transition to a low emission economy. Where a Clean Air Zone is introduced, it will be identified in the local plans and policies, and within local transport plans at the earliest opportunity to ensure it is consistent with wider ambition.

Local Planning Authorities are required to publish annual Air Quality Annual Status Reports (ASRs) to discharge their monitoring obligations under Part IV of the Environment Act (1995). Part IV of the Environment Act 1995 and Part II of the Environment (Northern Ireland) Order 2002 requires local authorities in the UK to review air quality in their area and designate Air Quality Management Areas (AQMAs) if improvements are necessary. Where an AQMA is designated, an Air Quality Action Plan (AQAP) must then be put in place. In this context, there are nine AQMAs within Cornwall, all of which are designated for exceedances in the annual mean concentration objective of 40µg/m³ for nitrogen dioxide (NO₂). These include Camborne-Pool-Redruth, Truro, St Austell, Bodmin, Tideford, Gunnislake, Camelford, Grampound and Launceston²⁶. The AQAPs for these AQMAs are contained within the Clean Air for Cornwall Strategy (minus Grampound and Launceston as they were not designated until after the Strategy was prepared).

Released in March 2017, the Clean Air for Cornwall Strategy²⁷ was developed to formalise Cornwall Council's implementation of current local and national planning policy and legislation, in addition to providing formal guidance for those wishing to develop within or within close proximity to an AQMA. The aims of the Strategy are:

To raise awareness of the air quality problems in Cornwall and provide an integrated approach to improving air quality.

²⁴ Defined as: 'an area where targeted action is taken to improve air quality and resources are prioritised and coordinated in order to shape the urban environment in a way that delivers improved health benefits and supports economic growth'.

²⁵ Department for Environment, Food and Rural Affairs (2020) Clean Air Zone Framework: Principles for setting up Clean Air Zones in England [online] available from:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zoneframework-feb2020.pdf

26 Cornwall Council (2018): 'Air Quality Management Areas', [online] available to access via:

quality-management-areas/>

Cornwall Council (2017): 'Clean Air for Cornwall Strategy', [online] available to download via:

https://www.cornwall.gov.uk/environment-and-planning/environmental-protection/environmental-protection-air-quality/clean- air-for-cornwall-strategy/>

- To reduce levels of pollution within AQMAs to below objective levels and improve air quality in Cornwall as a whole.
- To raise awareness of the links between health and travel, in respect of both air quality and personal fitness.
- To raise awareness and provide policy, guidance, and a framework for development and impact mitigation to those wishing to develop in Cornwall.
- To provide an approach for reducing emissions of fine particulates in order to help improve and protect public health; and
- To improve Cornwall Council's performance in terms of emissions and to provide strong leadership with regard to environmental sustainability and ensure that all Council activity is integrated in considering the effect it has on air pollution.

The Clean Air for Cornwall Strategy is currently being reviewed and updated²⁸.

The Cornwall Local Plan: Strategic Policies 2010-2030 were adopted in November 2016. The vision statement for the plan is as follows, with four overarching key themes underpinning the context of the plan: 'Achieve a leading position in sustainable living'

- To support the economy.
- To enable self-sufficient and resilient communities.
- To promote good health and wellbeing for everyone; and
- To make the most of our environment.

Objective 8 within key theme number 3 states to 'promote development that contributes to a healthy and safe population by ensuring the protection and improvement of air quality'. Furthermore, in regard to the 28 policies listed within the 'Cornwall Local Plan Strategic Policies 2010-2030' document, Policy 16 'Health and Wellbeing' directly relates to Air Quality.

Baseline Summary

Summary of Current Baseline

The Camborne-Pool-Redruth AQMA (**Figure A1.1** overleaf) has been primarily designated for exceedances in the annual mean concentration objective of 40µg/m³ for nitrogen dioxide (NO₂).

The 2019 Air Quality Annual Status Report (ASR)²⁹ for Cornwall concluded that with the exception of Camelford, all existing AQMAs continued to exceed the NO₂ annual mean objective and in some locations the hourly objective was also at risk of being exceeded due to the annual mean being greater than 60µg/m³.

Table A1.1 provides further information on the Camborne-Pool-Redruth AQMA.

²⁸ Cornwall Council (2020): 'Revised Clean Air Strategy for Cornwall', [online] available to access via: https://www.cornwall.gov.uk/environment-and-planning/environmental-protection/environmental-protection-air-quality/clean-air-for-cornwall-strategy/

for-cornwall-strategy/

²⁹ Cornwall Council (2019): 'Air Quality Monitoring Reports: ASR 2019', [online] available to download via:

http://www.cornwall.gov.uk/environment-and-planning/environmental-protection/environmental-protection-air-quality/air-quality-monitoring-reports/

with more efficient models and delivering driver training.

Table A1.1 AQMA Overview

AQMA Location **Actions outlined in AQAP** Date designated Camborne-Pool-December The AQMA covers On-going traffic and air quality Redruth (CPR) 2005 the CPR monitoring. AQMA³⁰ regeneration area, Improvement to traffic lights West with the main areas End/Penryn Street, Redruth. of concern including: . Redruth Strategic Employment Growth the A3047 and Package, promoting sustainable travel B3300, Wesley alternatives. Street (Camborne), Improved CPR cycle network. Tuckingmill and East Increased bus frequency and provision Hill (Camborne), of real time information; and West End/Penryn ECO Stars scheme, aiming to Street (Redruth) and • encourage businesses with HGVs, **Trefusis Junction** vans, buses and coaches to operate (Redruth). more efficiently, for example by replacing vehicles that require renewal

³⁰ Cornwall Council (2017): 'Camborne Pool Redruth Air Quality', [online] available to access via: <https://www.cornwall.gov.uk/environment-and-planning/environmental-protection/environmental-protection-air-quality/

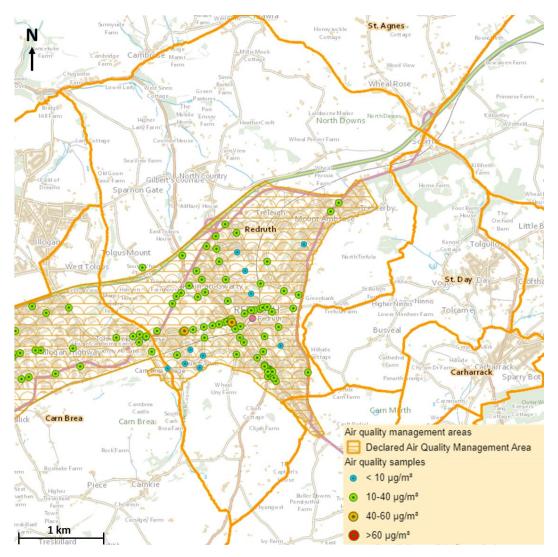


Figure A1.1: Camborne-Pool-Redruth AQMA (adapted from Cornwall Council's Interactive Map)³¹

Cornwall Council has progressed with actions included in the AQAP and Clean Air for Cornwall Strategy, as well as other actions included within individual town transport strategies which have the aim of reducing congestion, increasing use of alternatives to the private car use and improving local air quality.

It is also noted that in 2019 Cornwall Council was a winner of the Ultra-Low Emission Taxi Infrastructure Scheme competition, which fund local authorities in obtaining low emission taxis.³² This £90,000 Office of Low Emission Vehicles (OLEV) grant will support the wider use of electric and hybrid vehicles throughout the county through installing fast and rapid electric vehicle charging points, specifically for use by taxis.

Summary of Future Baseline

New housing and employment provision taken forward within the neighbourhood area has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants. Improvements to future air quality are dependent, in part, on whether the measures within the AQAP, Clean Air for Cornwall

³¹ Cornwall Council (2020): 'Online Interactive Map', [online] available to access via: https://map.cornwall.gov.uk/website/ccmap/?zoomlevel=1&xcoord=162690&ycoord=64380&wsName=ccmap&layerName=32 Office for Low Emission Vehicles (2019) Ultra Low Emission Taxi Infrastructure Scheme https://www.gov.uk/government/collections/government-grants-for-low-emission-vehicles#ultra-low-emission-taxi-infrastructure-scheme">https://www.gov.uk/government/collections/government-grants-for-low-emission-vehicles#ultra-low-emission-taxi-infrastructure-scheme

Strategy, and the Cornwall Local Transport Plan (later discussed in the Transportation chapter of this SEA Scoping Report) are successfully implemented.

A.2 Biodiversity and geodiversity

Policy Context

At the European level, the EU Biodiversity Strategy³³ was adopted in May 2011 in order to deliver an established new Europe-wide target to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'.

Site Improvement Plans (SIPs) have been developed for each Natura 2000 site in England as part of the Improvement Programme for England's Natura 2000 sites (IPENS). Although the IPENS project closed in 2015, the SIPs provide a high-level overview of the issues (both current and predicted) affecting the condition of the Natura 2000 sites. Additionally, SIPs outline the priority actions required to improve the condition of the sites, with timescales for several actions ongoing during 2020. Priority actions are grouped into categories, reflecting the issues faced by the Natura 2000 sites.

Key messages from the National Planning Policy Framework (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'helping to improve biodiversity.'
- 'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value [...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scape across local authority boundaries.'
- 'Planning policies and decisions should contribute to and enhance the
 natural and local environment by protecting and enhancing valued
 landscapes, sites of biodiversity or geological value and soils (in a manner
 commensurate with the statutory status or identified quality in the
 development plan); and minimising impacts on and providing net gains for
 biodiversity, including establishing coherent ecological networks that are
 more resilient to current and future pressures.'
- 'To protect and enhance biodiversity and geodiversity, plans should:
 - a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
 - b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority

³³ European Commission (2011): 'Our life insurance, our natural capital: an EU biodiversity strategy to 2020', [online] available to access via: http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP resolution april2012.pdf

species; and identify and pursue opportunities for securing measurable net gains for biodiversity'.

- Paragraph 175: When determining planning applications, local planning authorities should apply the following principles:
 - a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
 - b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.
 - c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
 - d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged.

The Natural Environment White Paper (NEWP)³⁴ sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss support functioning ecosystems and establish coherent ecological networks by 2020.
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas.
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

The UK Biodiversity Action Plan³⁵ (BAP) identifies priority species and habitats requiring conservation action. Although the UK BAP has been superseded, BAP

³⁴ Defra (2012): 'The Natural Choice: securing the value of nature (Natural Environment White Paper)', [online] available to access via:

http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf

³⁵ JNCC (2007) UK BAP priority species [online] http://archive.jncc.gov.uk/page-5717

priority species and habitats have been used to draw up statutory lists of priority species and habitats in England.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to 'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'36.

The recently published 25 Year Environment Plan³⁷ sets out the Government's environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies and initiatives (including mandatory biodiversity net gain, the development of a Nature Recovery Network, enhancing natural capital, and establishing Local Nature Recovery Strategies) which are focused on the following six key areas:

- Using and managing land sustainably.
- Recovering nature and enhancing the beauty of landscapes.
- Connecting people with the environment to improve health and wellbeing.
- Increasing resource efficiency and reducing pollution and waste.
- · Securing clean, productive and biologically diverse seas and oceans; and
- Protecting and improving the global environment.

In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' directly relate to the Biodiversity and Geodiversity SEA theme.

The UK Government has placed regulations on Local Planning Authorities (LPAs) to lead in responding to biodiversity losses by adopting clear environmental and planning policy requirements to encourage developers to take account of biodiversity impacts.

Additionally, Natural England's Natural Capital Atlas for Cornwall and the Isles of Scilly (June 2020) sets out indicators to explore the distribution and condition of natural assets across the county and the benefits they provide to society³⁸. The Atlas maps the quality of broad habitat types across Cornwall and the Isles of Scilly, including freshwater, farmland, grasslands, moorland / heathland, woodland, urban, coastal / marine, and will provide a useful source of reference for the subsequent stages of the SEA process.

The Cornwall Local Plan: Strategic Policies 2010-2030 were adopted in November 2016. Objective 10(b) within key theme number 4 states to 'maintain and enhance an

³⁶ DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] Available to access via: https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services
³⁷ HM GOV (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan pdf

environment-plan.pdf

38 Natural England (2020): 'Natural Capital Atlas 6 – Cornwall and Isles of Scilly', [online] available to access via: http://publications.naturalengland.org.uk/publication/6672365834731520

effective network of open space and environmental stewardship for our ecosystem services network for wildlife'. Furthermore, in regard to the 28 policies listed within the document, Policy 22 'European Protected Sites – mitigation of recreational impacts from development' and Policy 23 'Natural Environment' directly relate to Biodiversity.

Additionally, The Cornwall Biodiversity Action Plan³⁹ is presented in 4 volumes:

- Cornwall's Biodiversity Volume 1: Audits and Priorities.
- Cornwall's Biodiversity Volume 2: Action Plans.
- Cornwall's Biodiversity Volume 3: Action Plans 2004; and
- Cornwall's Biodiversity Volume 4: Priority Projects 2010-2015.

In 1996 the Cornwall Biodiversity Initiative (CBI) produced 'Cornwall's Biodiversity Volume 1: Audits and Priorities'. Following on from the recommendations in this document, Action Plans were produced for the Cornish priority habitats and species and published in 'Cornwall's Biodiversity Volume 2: Action Plans'. A further volume, 'Cornwall's Biodiversity Volume 3: Action Plans 2004' was produced in line with the UK Biodiversity Action Plan (UK BAP) process, highlighting the UK BAP priority habitats and species occurring in Cornwall. This comprised of 25 habitat and 127 species Action Plans, each written by local experts. In light of a progress review, Cornwall's BAP is currently being reviewed and updated, taking into consideration the new UK list of priority habitats and species, and the England Biodiversity Strategy (EBS) delivery framework. This document 'Volume4: Priority Habitats' will contain the revised list for Cornwall.

Cornwall's Environmental Growth Strategy was adopted in 2015⁴⁰. An overarching strategy for Cornwall's environment, the Strategy was developed through collaboration between Cornwall Council, the Cornwall & Isles of Scilly Local Nature Partnership and Cornwall's environmental stakeholders. The vision of the Strategy is as follows: 'In 2065, Cornwall's environment will be naturally diverse, beautiful and healthy, supporting a thriving society, prosperous economy and abundance of wildlife."

The Strategy has been developed to inform and improve strategic investment and decision making in Cornwall and offers a framework for stakeholders and partners to work more effectively together. It also provides long term structure to focus the ways in which environmental, social and economic prosperity in Cornwall can be increased.

Baseline Summary

Summary of Current Baseline

European and nationally designated sites

Special Areas of Conservation (SACs) are designated under the European Habitats Directive (92/43/EEC) for containing habitats and species listed in Annex I and II of

³⁹ Cornwall Council (2017): 'Biodiversity and Geological Conservation', [online] Available at:

https://www.cornwall.gov.uk/environment-and-planning/biodiversity-and-geological-conservation/?page=12898

⁴⁰ Cornwall Council, Cornwall & Isles of Scilly Local Nature Partnership (2015) Cornwall's Environmental Growth Strategy 2015-2065 http://www.cornwall.gov.uk/media/24212257/environmental-growth-strategy_ian17_proof.pdf

the Directive. In this regard, the northern, eastern and southern sections of the neighbourhood area are within the Zone of Influence for the Fal and Helford SAC.

The Fal and Helford SAC⁴¹ covers an area of 6,362ha and contains a rich biodiversity. This includes four Annex I habitats and one Annex II species that are a primary reason for the selection of the site, namely:

- Sandbanks which are slightly covered by sea water all the time.
- Mudflats and sandflats not covered by seawater at low tide.
- Large shallow inlets and bays.
- Atlantic salt meadows (Glauco-Puccinellietalia maritimae); and
- Shore dock (Rumex rupestris).

In the wider context, there are two SACs within a 5km radius of the neighbourhood area, as follows:

- Bristol Channel Approaches SAC (with Marine Components) is located approximately 2.5km to the north west of the neighbourhood area; and
- Godrevy Head to St Agnes SAC is located approximately 3km to the north of the neighbourhood area.

Sites of Special Scientific Interest (SSSI) are protected by law to conserve their wildlife or geology. Natural England is a statutory consultee on development proposals that might impact on SSSIs. There is one SSSI located within and adjacent to the boundaries of the neighbourhood area, as follows:

Designated in March 1999 and covering an area of approximately 54ha, West Cornwall Bryophytes SSSI encompasses seven distinct areas within West Cornwall. One of the SSSI areas is located towards the northern boundary of the neighbourhood area, with another located adjacent to the south western boundary of the neighbourhood area. The citation for the SSSI states⁴²:

"This site is special for its population of rare and scarce bryophytes (mosses and liverworts) which are adapted to growing on copper-rich substrates. The site is made up of seven areas of formerly mined land and the lower plant interest is primarily found on the spoil tips containing copper-rich waste, although some of the areas have derelict mine buildings and other structures which also support important bryophytes.

"The locations of particularly high interest for bryophytes within each area are those having very high levels of copper. As a result of the toxic nature of the spoil tips, these locations support little more than a mat of low-growing bryophytes and, in some places, lichens. These occupy relatively small areas within a more generally scrubby vegetation, with European gorse (*Ulex europaeus*), willows (*Salix sp*), heather (*Calluna vulgaris*) or rank grassland. Although the growth of these invasive species is slow due to the toxic nature of the spoil tips, in the long term the sites will require active management to prevent them shading out or growing over the areas that are important for bryophytes.

⁴¹ JNCC (no date): 'Fal and Helford SAC', [online] available to access via: https://sac.jncc.gov.uk/site/UK0013112>

⁴² Natural England (no date): 'West Cornwall Bryophytes SSSI', [online] available to access via: https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s2000365

"Where the structures and old buildings support important bryophytes then care must be taken during preservation or derelict land operations to safeguard the specialised conditions the plants require."

In the wider area, there are four additional SSSIs located within a 5km radius from the neighbourhood area, including: Wheal Gorland SSSI, Carrick Heaths SSSI, Godrevy Head to St Agnes SSSI, and Nance Wood SSSI.

SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location, including residential, rural-residential and rural non-residential. Natural England is a statutory consultee on development proposals that might impact on SSSIs. In this respect, most of the neighbourhood area overlaps with one or more SSSI IRZs for the types of development likely to come forward during the plan period (i.e. residential, rural residential, and rural non-residential development types).

Locally important sites

There is a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the neighbourhood area, predominantly areas of calaminarian grassland, deciduous woodland, lowland fens, lowland heathland, maritime cliff and slope, purple moor grass and rush pasture, and traditional orchard.

County Wildlife Sites (CWS) represent some of the most significant areas of seminatural habitat in Cornwall outside of statutory protected sites. The Cornwall Wildlife Trust states that there are 498 CWS throughout Cornwall which cover nearly 33,000ha of land (which is close to 10% of the entire county). The CWS range from small ponds, copses and linear features, such as river valleys, to wetlands, ancient woodlands and large moors⁴³. In this regard, there are two CWS within the neighbourhood area, as follows:

- Tolgus CWS is located at the northern boundary of the neighbourhood area, on land adjacent to the junction between New Portreath Road (the B3300) and Chapel Hill. The site includes areas of purple moor grass and rush pastures BAP Priority Habitat and calaminarian grassland BAP Priority Habitat. The CWS also includes drainage ditches which feed into the Portreath Stream (which passes alongside the western boundary of the CWS).
- Treskerby Wood CWS is located at the eastern boundary of the neighbourhood area and is primarily an area of deciduous woodland BAP Priority Habitat.

County Geology Sites (CGS) are some of the most significant areas for geology and heritage in Cornwall⁴⁴. They underpin and expand the network of SSSIs, and there are over 115 CGS throughout the county. They represent local character and distinctiveness, and range from man-made features such as mine spoil, underground workings, quarries and road cuttings – which provide rare inland exposures to large landscape features such as river corridors, estuaries, coastal cliffs and shore platforms. Although a publicly accessible map of these areas is not currently

⁴³ Cornwall Wildlife Trust (ca 2015): 'County Wildlife Sites', [online] documents available to access via:

http://www.cornwallwildlifetrust.org.uk/living-landscapes/county-wildlife-sites>

⁴⁴ ERCCIS (2020): 'County Sites', [online] available to access via: https://erccis.org.uk/CountySites

available, it is possible that the neighbourhood area might contain one or more CGS. This is given Redruth's mining heritage and rich mineral resource.

The Environmental Records Centre for Cornwall and the Isles of Scilly (ERCCIS) contains records of protected or notable species within the neighbourhood area⁴⁵. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians and reptiles; many of which are protected under the Wildlife and Countryside Act 1981 (as amended) and under Section 41 of the Natural Environment and Rural Communities Act 2006. In this respect, the BAP Priority Habitats and ecological designations within and surrounding the neighbourhood area are likely to support populations of protected species.

The figures overleaf show the location of the designated sites and BAP Priority Habitats within and within proximity to the neighbourhood area.

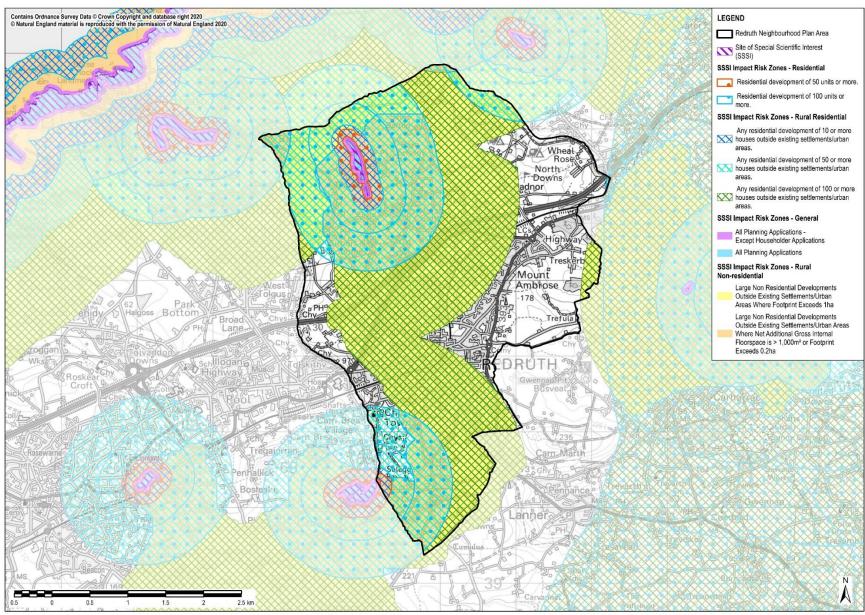
Summary of Future Baseline

Habitats and species will potentially face increasing pressures from future development within the neighbourhood area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

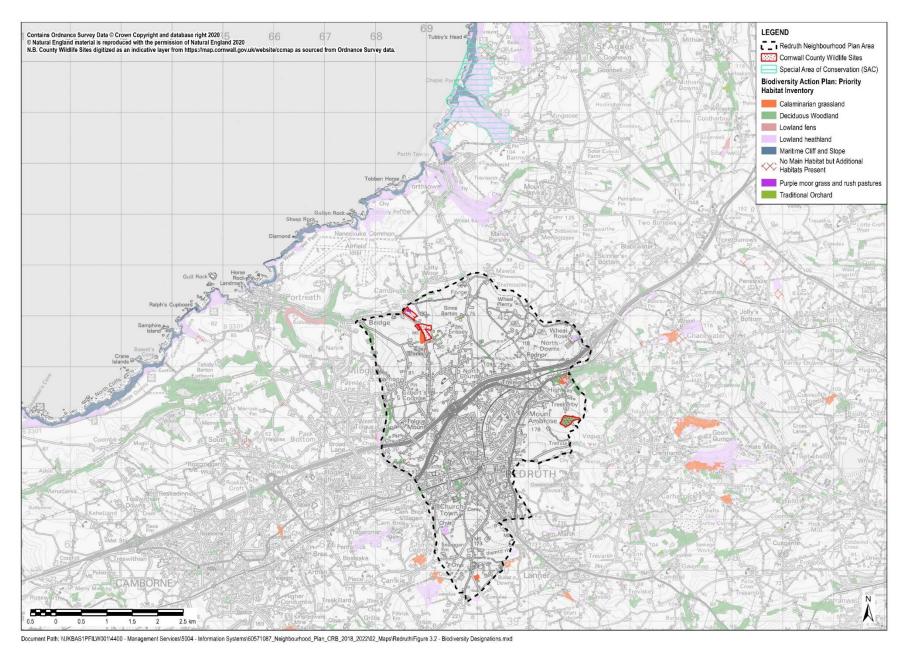
European and nationally designated sites are particularly sensitive to air quality issues and recreational pressures. Regarding air quality, exceeding critical values for air pollutants may result in changes to the chemical status of habitat substrate, accelerating or damaging plant growth, altering vegetation structure and composition and thereby affecting the quality and availability of nesting, feeding or roosting habitats. Additionally, the nature, scale, timing and duration of some human activities can result in the disturbance of species at a level that may substantially affect their behaviour, and consequently affect the long-term viability of their populations.

The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised within the neighbourhood area and in the surrounding areas.

⁴⁵ ERCCIS (2020): 'Environmental Records Centre for Cornwall and the Isles of Scilly' [online] available to access via: https://erccis.org.uk/



Document Path: \\UKBAS1PF\L\W001\4400 - Management Services\5004 - Information Systems\60571087_Neighbourhood_Plan_CRB_2018_2022\02_Maps\Redruth\Figure 3.1 - SSSIs and IRZs.mxd



Prepared for: Redruth Neighbourhood Plan Steering Group

A.3 Climate change

Policy Context

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It requires the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action in the next five years, see below⁴⁶:

- Flooding and coastal change risks to communities, businesses and infrastructure.
- Risks to health, well-being and productivity from high temperatures.
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry.
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity.
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.

The UK Climate Change Act⁴⁷ was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement. The Climate Change Act 2008 (2050 Target Amendment) Order 2019 means that there is now in place a legally binding target of net zero by 2050. The Climate Change Act includes the following:

- Commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. This includes reducing emissions from the devolved administrations (Scotland, Wales and Northern Ireland), which currently account for about 20% of the UK's emissions. The 100% target was based on advice from the CCC's 2019 report, 'Net Zero – The UK's contribution to stopping global warming' and introduced into law through the Climate Change Act 2008 (2050 Target Amendment) Order 2019.
- The Act requires the Government to set legally binding 'carbon budgets'. A
 carbon budget is a cap on the amount of greenhouse gases emitted in the
 UK over a five-year period. The carbon budgets are designed to reflect the
 cost-effective path to achieving the UK's long-term objectives. The first five
 carbon budgets have been put into legislation and run up to 2032.

⁴⁶ GOV UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to access via: https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017

⁴⁷ GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via http://www.legislation.gov.uk/ukpga/2008/27/contents

- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.
- The Act requires the Government to assess the risks and opportunities from climate change for the UK, and to prepare for them. The Committee on Climate Change's Adaptation Sub-Committee advises on these climate change risks and assesses progress towards tackling them. The associated National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same.

Key messages from the National Planning Policy Framework (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon economy.' 'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'
- 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'
- 'Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.'
- Direct development away from areas at highest risk of flooding (whether existing or future). 'Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.'

The Clean Air Strategy released in 2019 sets out the Government plans for dealing with all sources of air pollution. The strategy sets out proposals in detail and indicates how devolved administrations intend to make their share of emissions reductions, and complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.

In May 2019, the UK Parliament declared a climate emergency, with a view to explicitly acknowledging that human activities are significantly affecting the climate, and actions to mitigate and adapt to climate change should be paramount. This declaration has been mirrored by several local planning authorities across the country. Additionally, the shared vision produced by the Forestry Commission, Natural England and the Environment Agency in January 2020 outlines the use of

nature-based solutions to tackle the climate and ecological emergency⁴⁸. This includes through large-scale woodland planting in the right places, working with nature to manage flood risk, protecting and restoring peatlands, supporting farmers towards net zero, managing land in a more strategic way, as well as encouraging the use of less carbon intensive materials such as timber in construction.

In the context of the above, in January 2019 Cornwall Council declared a climate emergency⁴⁹. In response to the declaration, in July 2019 Cornwall Council approved the first iteration of a Climate Change Action Plan to help address the climate emergency. Included in that action plan was the creation of a Climate Emergency DPD to cover the issue of climate change. The DPD will focus on six key elements: renewable energy; energy efficiency; coastal change and flooding; natural climate solutions; transport development density and urban design; and agriculture and rural development.

Further context is provided by the recent commitment by environmental law firm Client Earth to request that all local authorities with emerging Local Plans to "explain how they will set evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy." Additionally, in response to the COVID-19 pandemic, the Green Alliance's 'Blueprint for a Resilient Economy' report outlines the following five essential building blocks to support new long term employment opportunities, thriving businesses and a healthier, fairer society, whilst protecting against the potentially devastating future impacts of climate change and nature's decline:

- Invest in net zero infrastructure.
- Restore nature.
- Stop wasting valuable resources.
- Ensure clean air and healthy places; and
- Make the recovery fair.

The Flood and Water Management Act⁵² highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings and retrofitting properties at risk (including historic buildings).
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water.
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere.

⁴⁸ GOV.UK (2020): 'Environmental bodies set joint vision to tackle climate change', [online] available to access via: https://www.gov.uk/government/news/environmental-bodies-set-joint-vision-to-tackle-climate-change

⁴⁹ Cornwall Council (2019): 'Climate Emergency', [online] available to access via: https://www.cornwall.gov.uk/environment-and-planning/climate-emergency/

and-planning/climate-emergency/

50 Client Earth (2019) Lawyers put local authorities on notice over climate inaction [online] available at:

https://www.clientearth.org/press/lawyers-put-local-authorities-on-notice-over-climate-inaction/

51 Cropp Allies 20 (2020): (Blue and the control of
⁵¹ Green Alliance (2020): 'Blueprint for a Resilient Economy', [online] available to access via: https://green-alliance.org.uk/hlueprint for a resilient economy pho

alliance.org.uk/blueprint for a resilient economy.php ⁵² Flood and Water Management Act (2010) [online] available to access via: http://www.legislation.gov.uk/ukpga/2010/29/contents

- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems (SuDS).⁵³

Further guidance is provided in the document 'Planning for SuDS'. 54 This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

The Cornwall Local Plan: Strategic Policies were adopted in November 2016. Objective 9(a) and 9(d) within key theme number 4 states to 'reduce energy consumption while increasing renewable and low carbon energy production' and to 'increase resilience to climate change'. Furthermore, in regard to the 28 policies listed within the document, the following directly rate to Climate Change:

- Policy 14: Renewable and low carbon energy.
- Policy 15: Safeguarding renewable energy.
- Policy 25: Green infrastructure; and
- Policy 26: Flood risk management and coastal change.

Baseline Summary

Summary of Current Baseline

Contribution to climate change

CO₂ emissions from the built environment are monitored and recorded at Local Authority level. In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change⁵⁵ suggests that Cornwall has broadly similar per capita emissions in comparison to the South West of England and England as a whole, since 2005. Cornwall has also seen a 36.3% reduction in the percentage of total emissions per capita between 2005 and 2016, slightly lower than the reductions for the South West of England (36.7%) and England (37.6%).

Road transport is the largest emitter of GHG in the UK, with cars contributing 55% of UK domestic transport emissions. Cornwall has a high dependency on private vehicles, with a large proportion of the population commuting by car (see Appendix A.9 for more details). The uptake of Ultra Low Emission Vehicles (ULEVs) will contribute positively towards the reduction of road transport related emissions.

In line with assumptions made by the Department for Transport's 'Road to Zero' report (2018), it is assumed that ULEV uptake will increase rapidly in the coming decade and therefore aside from HGVs, all vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030. There are currently no ULEV charging points in the neighbourhood area.

⁵³ N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDs.

⁵⁴ CIRIA (2010): 'Planning for SuDs – making it happen', [online] available from:

http://www.ciria.org/Resources/Free publications/Planning for SuDS ma.aspx 55 UK Gov (2017): 'Local Authority CO2 emissions estimates 2005-2017 (kt CO2) - Full dataset' [online] available from: https://www.gov.uk/government/collections/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics

Effects of climate change

The outcome of research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18)⁵⁶ team. UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile and RCP6) for the South West during the period 2020-2039 compared to the period 1981-2000 are likely to be as follows:⁵⁷

- A central estimate of increase in annual mean temperatures of between 0°C and 1°C; and
- A central estimate of change in mean precipitation of 0 to +10% in winter and 0 to -10% in summer.

During the period 2040-2059 this is estimated further as:

- A central estimate of increase in annual mean temperatures of between 1°C and 2°C; and
- A central estimate of change in annual mean precipitation of 0 to +20% in winter and -10% to -20% in summer.

Resulting from these changes, a range of risks may exist for the neighbourhood area, including:

- Effects on water resources from climate change.
- Reduction in availability of groundwater for extraction.
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain.
- Increased risk of flooding, including increased vulnerability to 1:100-year floods.
- A need to increase the capacity of wastewater treatment plants and sewers.
- A need to upgrade flood defences.
- Soil erosion due to flash flooding.
- Loss of species that are at the edge of their southerly distribution.
- Spread of species at the northern edge of their distribution.
- Increased demand for air-conditioning.
- Increased drought and flood related problems such as soil shrinkages and subsidence.
- Risk of road surfaces melting more frequently due to increased temperature;
 and

⁵⁶ Data released 26th November 2018 [online] available from: https://www.metoffice.gov.uk/research/collaboration/ukcp

⁵⁷ Met Office (2018): 'Land Projection Maps: Probabilistic Projections', [online map] available at: https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/land-projection-maps

Flooding of roads.

Flood risk

Cornwall is at risk from several types of flooding, including fluvial, coastal, tidal, surface water, groundwater, sewerage and drainage. As shown on the Environment Agency's flood map for planning⁵⁸, the areas within Flood Zone 2 and Flood Zone 3 within the neighbourhood area primarily cover those areas within proximity to Portreath Stream - the main watercourse passing through Redruth. This includes areas of Redruth town centre, particularly along and adjacent to Falmouth Road (the B3300). However, most of the neighbourhood area is within Flood Zone 1 and has a low fluvial flood risk. This is shown in **Figure A3.1** below.

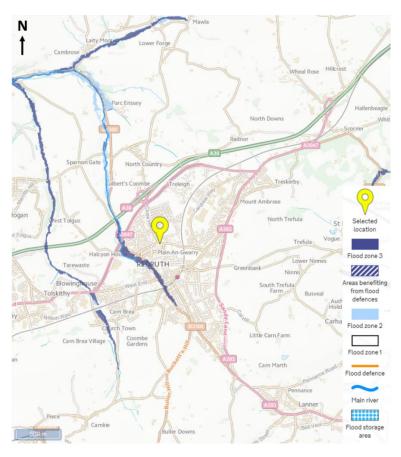


Figure A3.1: Fluvial flood risk in the neighbourhood area⁵⁹

Figure A3.2 shows surface water flooding in the neighbourhood area. There are several areas of Redruth which have a medium-high surface water flood risk, primarily impacting the local road network. The most recently completed Strategic Flood Risk Assessment (SFRA) for Cornwall⁶⁰ states that: "Two key sources of surface water flooding are runoff from agricultural or undeveloped land, and urban sources. Flooding from agricultural and undeveloped land is associated with the inability of the ground to absorb rain water (or snow melt), also known as the ground's permeability. Permeability can vary with land use, land management,

⁵⁸ Environment Agency (2020): 'Flood Map for Planning', [online] available to access via: < https://flood-map-for-planning.service.gov.uk/>

⁵⁹ GOV UK (2020): 'Flood Map for Planning', [online] available to access via: https://flood-map-for-planning.service.gov.uk/

⁶⁰ Cornwall Council (2009): 'Cornwall Strategic Flood Risk Assessment – Level 1', [online] available to access via:

https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/evidence-base/cornwall-strategic-flood-risk-assessment-sfra/

ground conditions and time of year. Flooding from urban areas is associated with runoff from impermeable areas such as roads, buildings, car parks etc."

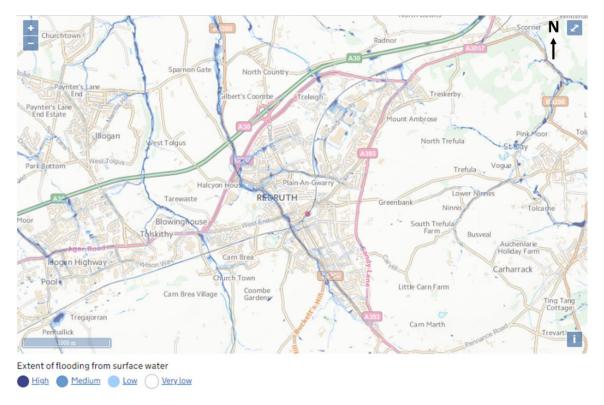


Figure A3.2: Surface water flood risk within the neighbourhood area⁶¹

Summary of Future Baseline

Climate change has the potential to increase the occurrence of extreme weather events in the neighbourhood area. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation. Specifically, new development areas have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk.

Implementation of sustainable urban drainage systems (SuDS) could help reduce the risk from surface water runoff, though it will continue to be important that new development avoids introducing large new areas of non-permeable hardstanding wherever possible.

In terms of climate change contribution, per capita greenhouse gas emissions generated in the neighbourhood area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric cars. However, increases in the built footprint of the neighbourhood area would contribute to increases in the absolute levels of greenhouse gas emissions.

In terms of the context of the Climate Change DPD, it is recognised that the DPD will seek to encourage investment in the right types of renewable technology and associated infrastructure in the right places. The DPD will support continued engagement with energy providers to enable suitable locations for development.

⁶¹ GOV UK (2020): 'Flood Map for Planning', [online] available to access via: https://flood-warning-information.service.gov.uk/long-term-flood-risk/map

This may include setting parameters for generating large scale solar and geothermal energy, alongside developing criteria-based policies to encourage land efficiency.

A.4 Landscape

Policy Context

The European Landscape Convention⁶² of the Council of Europe promotes the protection, management and planning of the landscapes and organises international co-operation on landscape issues. The convention was adopted in October 2000 and is the first international treaty to be exclusively concerned with all dimensions of European landscapes.

Key messages from the National Planning Policy Framework (NPPF) include:

- 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.'
- Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.'
- Planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).'
- 'Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils
 - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
 - remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.'

The policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's "A Green Future: Our 25 Year Plan to Improve the Environment' directly relate to the Landscape SEA theme.

The Cornwall Local Plan: Strategic Policies 2010-2030 were adopted in November 2016. Objective 10(a) within key theme number 4 states to 'respect the distinctive character of Cornwall's diverse landscapes. Furthermore, in regard to the 28

⁶² Council of Europe (2000): 'European Landscape Convention', [online] available to access via: https://www.coe.int/en/web/landscape

policies listed within the document, the following directly relate to the Landscape theme:

- Policy 23: Natural environment; and
- Policy 25: Green infrastructure.

Baseline Summary

Summary of Current Baseline

Nationally protected landscapes

Designated in 1959, the Cornwall AONB covers 958km² of land which equates to approximately 27% of the total area of the county. The AONB comprises twelve local areas within Cornwall: Hartland, Pentire Point to Widemouth, The Camel Estuary (which became part of the AONB in 1981), Carnewas to Stepper Point, St Agnes, Godrevy to Portreath, West Penwith, South Coast Western, South Coast Central, Rame Head, and Bodmin Moor. In this respect, the neighbourhood area is located approximately 1.5km to the south east of the 'Godrevy to Portreath' section of the Cornwall AONB.

AONB management plans present the special qualities and features of AONBs and determine what actions are required to ensure their conservation and enhancement. The Cornwall AONB Management Plan⁶³ (2016-2021) contains the statement of significance for Godrevy to Portreath, alongside an overview of the condition, management and planning policies for this section of the AONB.

The neighbourhood area is not within or within proximity to a National Park or any Green Belt land.

National Character Areas

National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to their character. In this respect, most of the neighbourhood area overlaps with the 'Cornish Killas' NCA. A small area of land towards the southern boundary of the neighbourhood area overlaps with the 'Carnmenellis' NCA.

NCA profiles also provide Statements of Environmental Opportunities (SEO) to protect and enhance the special qualities of these areas. Completed by Natural England in 2014, the NCA profiles contain the following SEOs:

Cornish Killas NCA64

 SEO 1: Manage, restore, link and enhance the area's rich mosaic of wildlife habitats, expanding their quality, extent and range where appropriate. This needs to be achieved alongside sustainable agricultural practices, which contribute to soil and water quality as well as providing habitat management.

⁶³ Cornwall AONB (ca 2016): 'The Cornwall AONB Management Plan 2016-2021', [online] available to view via: http://www.cornwall-aonb.gov.uk/management-plan/

⁶⁴ Natural England (2014): 'Cornish Kills NCA Profile', [online] available to access via: http://publications.naturalengland.org.uk/publication/6654414139949056?category=587130

This benefits the local economy, minimises soil erosion and flooding and provides increased recreational opportunities.

- SEO 2: Conserve, manage and increase understanding of the area's rich historic environment and its valuable interlinked geological and cultural heritage – including the mining legacy, the prehistoric and later settlements and ritual remains, and the unique Cornish hedges and field patterns – which combine to bring a unique historical and cultural identity to Cornwall.
- SEO 3: Sustainably manage the visitor pressure associated with this
 distinctive landscape to ensure that the numerous recreational opportunities,
 such as the South West Coast Path and high-quality beaches, continue to be
 enjoyed sustainably by the local community and visitors. Develop volunteering
 opportunities both for local residents and for visitors, and endeavour to better
 connect people with places and natural assets.

Carnmenellis NCA⁶⁵

- SEO 1: Conserve, manage and increase the understanding of the unique historic landscape and its geological and heritage assets, including the internationally important mining legacy, the distinctive granite tors, the prehistoric and later settlements and ritual remains, and the unique Cornish hedges and field patterns.
- SEO 2: Manage, restore, link and improve the area's rich mosaic of heathland, moorland and rough grassland, enhancing and extending its range, while encouraging sustainable agricultural practices which contribute to the soil quality, water quality and habitat condition, as well as to the local economy.
- SEO 3: Encourage the development of sustainable tourism linked to the World Heritage Site. This should focus on sensitively increasing access to and interpretation of the area, which will encourage the strong local sense of identity.

Landscape, townscape and villagescape character

Landscape, townscape and villagescape character play an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns in the landscape which make one area different from another. Landscape, townscape and villagescape character can assist in the assessment of the likely significance of effects of change resulting from development and the value of the local area, both in visual and amenity terms.

Completed in 2007, the 'Cornwall and Isles of Scilly Landscape Character Study'66 provides information about the Landscape Character Areas (LCA) within the region. The Study also provides information about the evolution of the LCAs and how they have been formed, influenced and changed over time. The results of the Study identified 40 LCAs within Cornwall. These LCAs are shown below in **Figure A4.1**.

⁶⁵ Natural England (2014): 'Carnmenellis NCA Profile', [online] available to access via: http://publications.naturalengland.org.uk/publication/6254102417768448?category=587130

⁶⁶ Cornwall Council (2017): 'Landscape Character Assessment', [online] available to access via:

https://www.cornwall.gov.uk/environment-and-planning/cornwalls-landscape/landscape-character-assessment/

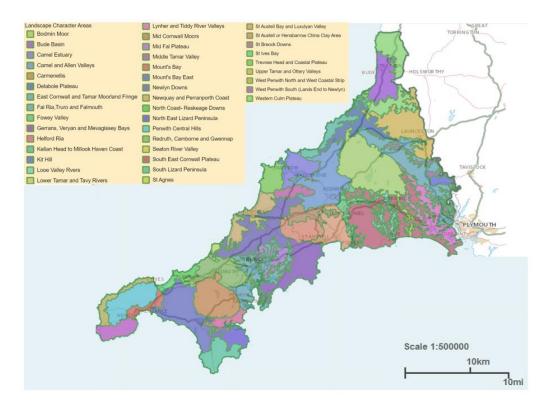


Figure A4.1: LCAs across Cornwall (adapted from Cornwall Council's Interactive Map)

In this regard, most of the neighbourhood area is within LCA 11 'Redruth, Camborne and Gwennap'. The southern section of the neighbourhood area is within LCA 10 'Carnmenellis'. Taken from the LCA descriptions, an overview of the key characteristics, pressures, and planning / land management guidelines for each LCA is provided below.

Redruth, Camborne and Gwennap LCA⁶⁷

Key Characteristics

- Rolling slate and siltstone landscape with small scale inland but more open on the north coast.
- Post-industrial mining landscape with many visible mining relics, including old engine houses and revegetating spoil heaps with remnant surviving or developing woodland, heath or wetland.
- Extensive Lowland Heathland with bracken and scrub along coastal strip.
- Pastoral landscape of improved and rough grazing with extensive areas of rough land.
- Strong field pattern enclosing small-medium scale fields and narrow lanes.
- Trees, occurring in hedges, valleys, corner of fields and around farm buildings.
- Valleys which are shallow and narrow, containing small streams.
- A well populated landscape containing Cornwall's largest built-up area.

⁶⁷ Cornwall Council (2008): 'Redruth, Camborne and Gwennap LCA Description', [online] available to access via: https://map.cornwall.gov.uk/reports_landscape_chr/areaCA11.pdf

Many built structures giving the landscape a cluttered appearance.

Pressures

- Development pressure within and on the edges of settlement both small scale, cumulative and large scale.
- Reversion due to lack of management in marginal farming areas.
- Conflicting land use on despoiled mining land.

Planning and Land Management Guidelines

- Create a comprehensive development plan for the whole of the urban area as well as the villages to accommodate expansion and ensure integration with the landscape.
- Provide strong design guidelines for development differentiating between those adjacent to large urban areas and those adjacent to small settlements.
- Conserve and manage the historic industrial landscape, particularly in the World Heritage Site.
- Develop a strategy to encourage planting especially within the estates encouraging new woodlands as well as small copses and planting on hedgerows and field corners.
- Integrate new development and existing farm buildings into the landscape with carefully designed planting including pine and sycamore.

Carnmenellis LCA⁶⁸

Key Characteristics

- Gently undulating open and exposed elevated granite plateau, boggy in places, with radiating valleys at edge.
- Significant remains of mining and quarrying industry including mine engine house and related structures and settlements, particularly around Carn Brea to the north and around Porkellis.
- Permanent pasture and rough grazing, with some horticulture on south facing slopes.
- Cornish hedges and some hedgerows enclosing small to medium scale fields of Anciently Enclosed Land, once highly managed.
- Few hedgerow trees on plateau and narrow areas of woodland (mostly Wet Woodland) in valleys.
- Fragmented remnant Lowland Heathland in high parts of Landscape Character Area with associated species in Cornish hedges.
- Settlement pattern of mainly dispersed villages of medieval origin.
- Pylons, masts and poles prominent in places.
- Long views from elevated areas.
- Upland recently enclosed as small farms and 'miners' smallholdings.

⁶⁸ Cornwall Council (2008): 'Carnmenellis LCA Description', [online] available to access via: https://map.cornwall.gov.uk/reports_landscape_chr/areaCA10.pdf

Pressures

- Changes in agricultural practice reducing management input- field rationalisation, intensification, new structures and diversification.
- Suburbanisation of dispersed settlements.
- Windfarm development.

Planning and Land Management Guidelines

- Manage the historic features of the World Heritage Site in particular and improve interpretation in places.
- Maintain and repair Cornish hedges, hedgerows and stiles using appropriate materials and methods of construction.
- Manage Upland Rough ground for biodiversity and archaeology.
- Encourage the planting of small woodlands and farm copses in sheltered valleys avoiding planting conifer plantations on high open ground.
- Develop design guidance to avoid incremental change to dwellings and development out of scale, pattern and landscape character.

Additionally, a Historic Landscape Character (HLC)⁶⁹ Assessment was completed in the 1996 as part of a pilot study encouraged by English Heritage (now Historic England). The Assessment identified 16 HLC 'Zones' throughout Cornwall which interpret and present the distinctive features and spatial patterns of Cornwall's historic landscape. In this regard, there are five main HLC Zones within the neighbourhood area, including: Settlement: older core (pre-1907), Farmland: Medieval, Farmland: Post Medieval, Upland Rough Ground, and Industrial: Disused. These are shown on Cornwall Council's Interactive Map.

Heritage Coast

Heritage Coasts are the finest stretches or undeveloped coastline in England and Wales, with their natural beauty and enjoyment by the public giving them special claim for both protection and sensitive management. In this context, the neighbourhood area is located approximately 1.5km to the south east of the Godrevy to Portreath Heritage Coast. The Heritage Coast shares an overlapping boundary with the Cornwall AONB.

Tree preservation orders

Implemented by local planning authorities, Tree Preservation Orders (TPOs) are designated to protect specific trees, groups of trees or woodlands in the interests of their amenity value. When considering 'amenity; the local planning authority will likely take into consideration the following criteria⁷⁰:

 Visibility: the extent to which the trees or woodlands can be seen by the public; and

⁶⁹ Cornwall Council (201): Historic Landscape Character', [online] available to access via:

historic-environment-service/cornwall-and-scilly-historic-environment-service/cornwall-and-scilly-historic-environment-record/historic-landscape-character/

environment-record/nistoric-iariuscape-ciraracter/⁷⁰ GOV.UK (2014): 'Tree Preservation Orders – General', [online] available to access via: https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas

 Individual, collective and wider impact: considering the importance of the trees or woodlands in relation to their cultural or historic value, contribution to and relationship with the landscape and/or their contribution to the character or appearance of a conservation area.

In this context, Cornwall Council has designated numerous TPOs in the interest of their amenity value, as shown in **Figure A4.2** below.

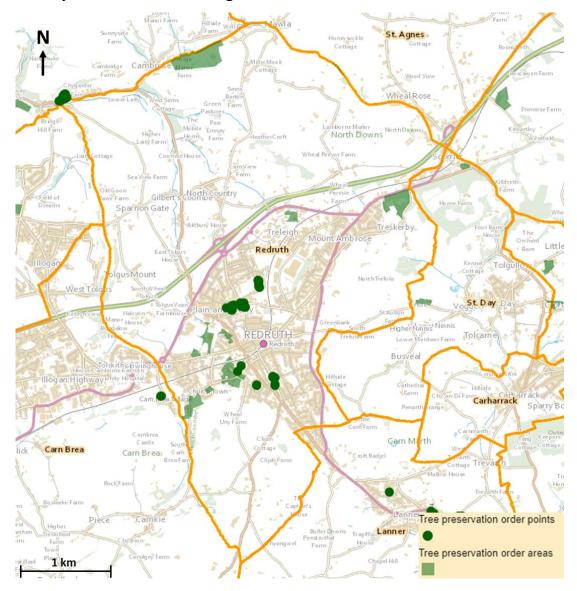


Figure A4.2: TPOs within the neighbourhood area (adapted from Cornwall Council's Interactive Map)

Visual amenity

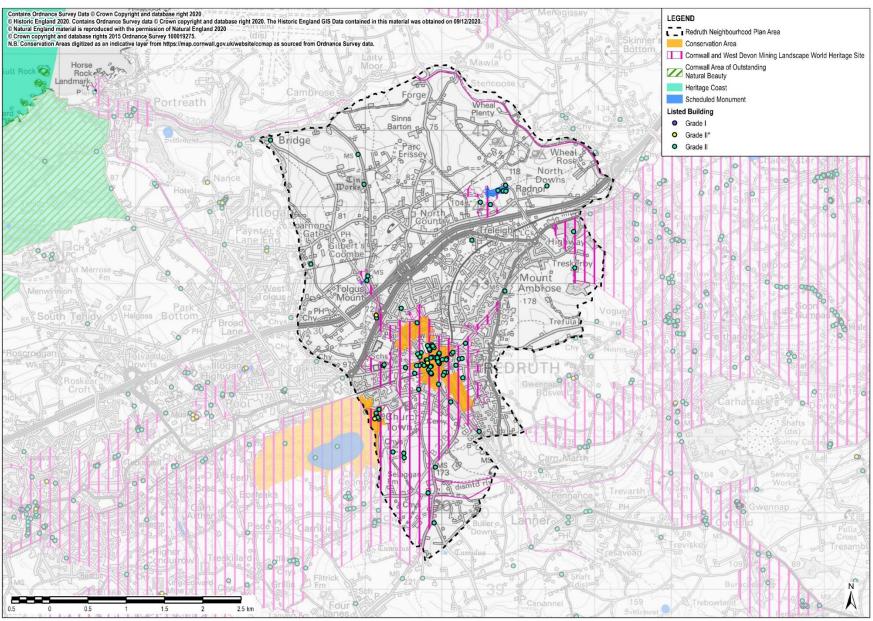
It is useful to note that the views across the parish are also an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process. Changes, such as development and landscape change, can see these views degraded overtime.

Summary of Future Baseline

New development has the potential to lead to incremental but small changes in landscape, townscape and villagescape character and quality in and around the

neighbourhood area. This includes from the loss of landscape features and areas with an important visual amenity value.

In the absence of the Neighbourhood Plan, inappropriate levels of development within the open countryside could negatively impact upon the landscape features which contribute to the distinctive character and setting of the neighbourhood area.



Document Path: \\UKBAS1PFILW001\400 - Management Services\5004 - Information Systems\60571087_Neighbourhood_Plan_CRB_2018_2022\02_Maps\Redruth\Figure 5.1 - Designated Historic Assets and Landscape Designations.mxd

A.5 Historic environment

Policy Context

The vision presented by the Cornwall and West Devon Mining Landscape World Heritage Site Management Plan (2013-2018)⁷¹ states:

'We believe that by protecting, conserving and enhancing the outstanding universal value of the Cornwall and West Devon Mining Landscape World Heritage Site it will reinforce cultural distinctiveness, and become a significant driver for economic regeneration and social inclusion'.

The aims within the 2013-2018 Management Plan for the next 25 years and beyond are as follows:

- To protect, conserve and enhance the historical authenticity, integrity and historic character of the Site for current and future generations.
- To promote opportunities within the Site for heritage-led regeneration.
- To communicate the distinctiveness of Cornish mining culture and identity.
- To promote public access to sites, collections and information.
- To undertake and facilitate research to increase knowledge and understanding.
- To interpret and present the history and significance of Cornish mining to the highest quality.
- To promote educational use of the Site; and
- To optimise the contribution of the Site to the local economy.

A Supplementary Planning Document (SPD) has also been prepared for the World Heritage Site. Adopted in May 2017⁷², the SPD sets out how the planning system will seek to protect, conserve, present and transmit its World Heritage Sites to future generations. Reiterating national policy, substantial harm to the WHS should be wholly exceptional, and the SPD is concerned with protecting the special features that make the Cornish and West Devon Mining Landscape worthy of being a WHS, in addition to ensuring that all stakeholders have a shared understanding and an accountable, transparent description of how the management system works.

The Cornish Mining World Heritage Site Partnership Board are currently in the process of reviewing and updating the Management Plan. In this respect, a public consultation on the WHS Draft Management Plan (2020-2025)⁷³ was completed between July and August 2020. The results of the consultation are currently being considered with a view to inform and influence the proposed policies and strategic actions within the Management Plan.

⁷¹ Cornwall Council (2013): 'World Heritage Management Plan', [online] available to download from: http://www.cornish-

mining.org.uk/news/world-heritage-management-plan-now-available>

72 LUC on behalf of Cornwall and West Devon Mining Landscape World Heritage Site Office (May 2017) Cornwall and West Devon Mining Landscape World Heritage Site, Supplementary Planning Document https://www.cornwall.gov.uk/media/26989792/cwdmlwhs.spd final may 2017.pdf

⁷³ Cornwall Council (2020): 'WHS Draft Management Plan Consultation', [online] available to access via: https://www.cornwall.gov.uk/environment-and-planning/conservation/world-heritage-site/news/world-heritage-site-draftmanagement-plan-consultation/

Key messages from the National Planning Policy Framework (NPPF) include:

- Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Plans should set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk.
- 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.'

The policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the Historic Environment SEA theme.

The Government's Statement on the Historic Environment for England⁷⁴ sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. The Heritage Statement (2017)⁷⁵ updates the 2010 Statement on the Historic Environment for England and sets out the Government's vision for supporting the heritage sector to help it to protect and care for heritage and the historic environment in the coming years, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

Historic England is the statutory body that helps people care for, enjoy and celebrate England's spectacular historic environment. Guidance and advice notes provide essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties on historic environment considerations, and are regularly reviewed and updated in light of legislative changes. The following guidance and advice notes are particularly relevant and should be read in conjunction with the others.

Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 – Second Edition (February 2019)⁷⁶ outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development. Principally, the advice note emphasises the importance of:

 Understanding the different types of special architectural and historic interest which underpin the designations; and

⁷⁴ HM Government (2010): 'The Government's Statement on the Historic Environment for England', [online] available to access via: http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference library/publications/6763.aspx>

⁷⁵ Department for Digital, Culture, Media and Sport (2017) Heritage Statement [online], available at:

https://www.gov.uk/government/publications/the-heritage-statement-2017

Thistoric England (2019): 'Conservation Area Designation, Appraisal and Management: Advice Note 1 (second edition)', [online] available to access via:

 Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of conservation areas.

Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)⁷⁷ provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2nd Edition) (December 2017)⁷⁸ provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:

- Step 1: Identify which heritage assets and their settings are affected.
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm;
 and
- Step 5: Make and document the decision and monitor outcomes.

Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)⁷⁹ outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant of issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.

Historic England Advice Note 7 'Local Heritage Listing'⁸⁰ supports local authorities and communities to introduce a local list in their area, encouraging a more consistent approach to the identification and management of local heritage assets across England. Local lists play an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment. They enable the significance of any building or site on the list (in its own right and as a contributor to the local planning authority's wider strategic planning objectives), to be better taken into account in planning applications affecting the building or site or its setting.

The Cornwall Local Plan: Strategic Policies 2010-2030 were adopted in November 2016. Objective 10(a) within key theme number 4 states to 'respect the distinctive

⁷⁷ Historic England (2016): 'SA and SEA: Advice Note 8' [online] available to access via: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/

books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/
⁷⁸ Historic England (2017): 'Setting of Heritage Assets: 2nd Edition', [online] available to access via:

https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/

⁷⁹ Historic England (2018): 'Neighbourhood Planning and the Historic Environment', [online] available to access via: https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/

⁸⁰ Historic England (2016): 'Local Heritage Listing: Advice Note 7', [online] https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/

character of Cornwall's diverse landscapes'. Furthermore, in regard to the 28 policies listed within the document, Policy 24 'Historic Environment' directly relates to the Historic Environment theme.

Baseline Summary

Summary of Current Baseline

Historic evolution of Redruth

Along with the Redruth Town Centre Conservation Area Appraisal and Management Strategy (later discussed in this chapter), the Cornwall Industrial Settlements Initiative⁸¹ and the Cornwall and Scilly Urban Survey⁸² provide a narrative history of the neighbourhood area. A brief overview is provided below.

Redruth is a town of distinctive and strong character borne from its varied and interesting history. It can trace its origins to the early medieval period, but much of its character derives from the prosperity which it experienced in the 18th and 19th centuries, when it was a major centre for the Cornish tin and copper-mining industry.

The town is located at the junction of valleys at the cross-roads of two important historic routes: the main west-east road leading from Land's End to Truro and beyond, and the road connecting the south and north coast between Falmouth and Portreath. Redruth was also located at a ford over the Tolgus; this ford and crossroads explain the decision to locate a settlement here. Redruth had been established by the early 14th century and took its name from the Cornish 'Rid-ruth', meaning 'red ford', for the Tolgus ran red from tin streaming upriver.

Geology is probably the most influential factor in the development of Redruth. The underlying rock of this area is largely granite or slate. The hills of Carn Brea and Carn Marth to the south-west and south-east of Redruth are such granite intrusions. The local geology is obvious in the building materials: the majority of buildings are constructed from local killas and granite with slate roof tiles and frequently with slate hanging; much of the pavement is granite.

Redruth, like Truro and Helston, was originally a market town for the local area. Remnants of the medieval townscape and of the narrow burbage plots in the lower part of Fore Street still survive. The commercial role of Redruth persisted through the 18th and 19th centuries and is evident in the numerous fine shop fronts that survive in Fore Street, West End, and Bond Street. The town experienced a decline in the 20th century, linked to the vagaries of the mining industry, but the town has a rich heritage that provides a sound basis for regeneration.

Designated heritage assets and areas

The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent.

⁸¹ Cornwall Council (2002): 'Cornwall Industrial Settlements Initiative: Redruth and Plain-an-Gwarry', [online] available to access via: https://www.cornwall.gov.uk/media/28966782/redruth red.pdf

⁸² Cornwall Council (2004): 'Cornwall and Scilly Urban Survey: Redruth Report', [online] available to access via: https://www.cornwall.gov.uk/environment-and-planning/strategic-historic-environment-service/guidance/appraisals-and-surveys/cornwall-and-scilly-urban-survey/towns/

An overview of the designated historic environment assets present in the neighbourhood area is provided below. Historic landscapes within Cornwall (including Heritage Coasts and Historic Character Assessments) are discussed within the 'Landscape' chapter of this report.

Cornwall and West Devon Mining Landscape World Heritage Site

The United Nations Educational, Scientific and Cultural Organisation (UNESCO) World Heritage Sites are places, <u>monuments</u> or <u>buildings</u> which have been recognised as of "outstanding universal value" to humanity.

The Cornwall and West Devon Mining Landscape was inscribed as a UNESCO World Heritage Site in 2006, encompassing ten areas within the region with significant mining heritage. Much of the landscape of Cornwall and West Devon was transformed in the 18th and early 19th century as a result of the rapid growth of pioneering copper and tin mining. The Outstanding Universal Value of the WHS is a reflection of both the integrity and authenticity of the area, and is determined based on the following criterion:

- Exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town planning or landscape design.
- Bear a unique or at least an exceptional testimony to a cultural tradition or to a civilisation which is living, or which has disappeared; and
- Be an outstanding example of a type of building or architectural or technological ensemble or landscape which illustrates (a) significant change(s) in human history.

In this respect, the neighbourhood area partly overlaps with the 'Camborne & Redruth with Portreath' area of the WHS, described as follows⁸³:

"This was the centre of the Cornish mining industry, and home to many of its most important mines and individuals.

"The impressive bulk of Carn Brea – a high granite ridge with jagged outcrops and fantastic 360° vistas – frames most views of Camborne and Redruth, serving as a reminder of the geology that underpinned their rapid growth.

"This Area features essential rail links to Portreath harbour, historic mining cottages, the Great Flat Lode, (an extensive flat-dipping mineral vein extremely rich in tin), and South Crofty, Cornwall's last operating tin mine. Heartlands, a unique visitor attraction and the mid Cornwall gateway to the Cornish Mining World Heritage Site, is situated nearby and offers a wide range of events and activities all year round. King Edward Mine: the training mine for Camborne School of Mines is also close by and has an award-winning museum.

"It includes rugged open countryside, a lovely sandy beach, and bustling towns with the remains of its mining history ever-present.

"The Camborne and Redruth Mining District became significant internationally for the pioneering technological progress made here, such as Richard

⁸³ Cornwall Council (2020): 'Camborne and Redruth with Portreath', [online] available to access via: https://www.cornwall.gov.uk/environment-and-planning/conservation/world-heritage-site/areas-places-and-activities/camborne-and-redruth-with-portreath/

Trevithick's steam engines, William Bickford's invention of the safety fuse, (which saved countless miners' lives), and William Murdoch's house, being the first in the world to be lit by gas (in 1792). A visit to East Pool Mine reveals the story of this Area and its huge achievements.

"This is classic Cornish Mining landscape, with the highest concentration of historic mining sites anywhere in the world."

Listed buildings

Listed building are nationally designated buildings which are protected through the Listed Buildings and Conservation Areas Act 1990.⁸⁴ According to the National Heritage List for England⁸⁵, the neighbourhood area contains 94 listed buildings, including two Grade II* listed buildings and 92 Grade II listed buildings. The Grade II* listed buildings are as follows:

- Sara's Foundry, Town Mill; and.
- · Church of St Euny.

Scheduled monuments

The Ancient Monuments and Archaeological Areas Act (1979)⁸⁶ allows the investigation, presentation and recording of matters of archaeological or historical interest and makes provision for the regulation of operations or activities which may affect ancient monuments and archaeological areas. Scheduled monuments are nationally designated sites which are protected under the Act. In this regard, there are two scheduled monuments within the neighbourhood area, including:

- Part of the mining complex at Wheal Peevor; and
- The Tolgus arsenic works 80m south east of East Tolgus House.

Registered historic parks and gardens, and historic battlefields

Historic England's 'Register of Parks and Gardens of Special Historic Interest in England', established in 1983, currently identifies over 1,600 sites assessed to be of significance. No historic parks and gardens are present in the neighbourhood area.

Historic England's Register of Historic Battlefields identifies important English battlefields. Its purpose is to offer them protection through the planning system, and to promote a better understanding of their significance and public enjoyment. No historic battlefields are present in the neighbourhood area.

Conservation areas

Conservation areas are designated because of their special architectural and historic interest. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater

⁸⁴ Planning (Listed Buildings and Conservation Areas) Act (1990) [online] available at: https://www.legislation.gov.uk/ukpga/1990/9/contents

⁸⁵ Historic England (2020): 'National Heritage List for England – Advanced Search', [online] available to access via: https://historicengland.org.uk/listing/the-list/advanced-search?searchType=nhleadvancedsearch>

⁸⁶ Ancient Monuments and Archaeological Act (1979) [online] available at: https://www.legislation.gov.uk/ukpga/1979/46

understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England⁸⁷.

There are three conservation areas which wholly or partly overlap with the neighbourhood area. Redruth Town Centre Conservation Area and Plain-an-Gwarry Conservation Area are wholly located within the existing settlement boundary for Redruth. Carn Brea Conservation Area is partly within the western section of the neighbourhood area, but mainly encompasses the neighbouring settlement of Carn Brea Village (including the 'Neolithic hilltop enclosure with later settlement and defensive structures, a prehistoric field system, a medieval castle and deer park and mineral workings on Carn Brea' scheduled monument).

It is important to note that a conservation area appraisal or management strategy has not been prepared Carn Brea, therefore it is not currently possible to gain an indepth understanding of the special interest of the area. However, an overview of the special interest of the Redruth Town Centre Conservation Area and Plain-an-Gwarry Conservation Area is provided below (taken from their respective conservation area appraisal and management strategy documents).

The Redruth Town Centre Conservation Area was designated in 1983 and since then has been extended twice (in 1988 and 1991). The special and distinctive character derives from the following key elements⁸⁸:

- Its dramatic topography which creates views of the unfolding streetscape and cleverly placed landmarks.
- Its origins as a commercial centre, evident in the medieval burgage plot pattern in Fore Street and high-quality 19th century commercial architecture.
- Its growth as a mining centre, which led to building booms in the 1820s and 1870s–1880s and associations with nationally-important inventors and engineers. Industrial chimneys are still prominent landmarks.
- The influence of local architect James Hicks.
- Redruth is largely characterised by 2–3 storey terraces, with the exception of the semi-detached houses in Clinton Road and Albany Road; and
- The palette of materials provides a coherence and uniformity to the conservation area and comprises of local killas, granite, slate and sometimes the use of brick in commercial buildings.

There are six key threats to the Redruth Town Centre Conservation Area listed within the appraisal and management strategy, as follows:

- The strategies to regenerate Redruth and the surrounding area will take time
 to develop, fund, and implement. In the meantime, there is a risk that the
 historic built fabric of the town will continue to degrade in view of the
 economic difficulties which it is currently experiencing, and as a result could
 make new investment problematic.
- Development beyond the centre of Redruth may be to the detriment of Redruth itself, either by providing new retail foci that compromise the

⁸⁷ Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to access via: https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/

⁸⁶ Cornwall Council (2010): 'Redruth Town Centre Conservation Area Appraisal and Management Strategy', [online] available to access via: https://map.cornwall.gov.uk/reports_conservation_areas/Redruth.pdf

viability of the historic core, or by diverting traffic further away from the centre.

- Traffic management schemes within the central area could fail to acknowledge the special character and appearance of the Conservation Area; they might also be economically disadvantageous by discouraging visits as a result of parking restrictions, one-way streets, or further pedestrianisation.
- An expanded Redruth could well lead to further traffic congestion in the town centre.
- Town fringe developments may lead to the further anonymisation of the approaches to Redruth; and
- Inappropriate installation of satellite dishes on the front of buildings.

Located directly to the north of Redruth Town Centre, Plain-an-Gwarry Conservation Area has a strong, locally distinctive character, particularly in the older western area. This character sets it apart from Redruth and is derived from the following key elements⁸⁹:

- Its 17th and 18th century origins as a workers' settlement, evidenced in the rows of cottages along the main streets.
- The long south-facing gardens of many of the historic cottages.
- Its development along a combination of parallel main streets and back yard infills, which means that there is in some places a relatively 'informal' and surprisingly rural street plan in places.
- The contrast between the original industrial settlement and the later middleclass housing in Claremont Road and Green Lane.
- The use of stone for buildings, often in a relatively informal way but with pronounced quoins and other formal details.
- Its physical separation from the centre of Redruth, historically by means of market gardens and now by car parks; and
- Pedestrian connections to the centre of Redruth through the passageways which lead off Fore Street and across the car park towards Plain-an-Gwarry.

There are four key threats to the Plain-an-Gwarry Conservation Area listed within the appraisal and management strategy, as follows:

- General issues which could result from the inappropriate redevelopment of the brewery site, or from other out-of-character interventions on gap/opportunity sites.
- Further degradation in the public realm, both along the main roads into Plain-an-Gwarry and also on such roads as King Street.
- The long gardens which are a feature of Plain-an-Gwarry could well become compromised by the modern-day preference for privacy, which to some

⁸⁹ Cornwall Council (2010): 'Plain-an-Gwarry Conservation Area Appraisal and Management Strategy', [online] available to access via: https://map.cornwall.gov.uk/reports conservation areas/Plain-an-Gwarry%20CAA%20and%20MS%20march%202010 high%20res.pdf

extent runs counter to the 'open', public nature of these gardens and their visibility from the street; and

Flooding in the Brewery area.

The conservation area appraisals and management strategy documents for Redruth Town Centre and Plain-an-Gwarry also contain several management and enhancement principles and actions, grouped into the following themes: public realm (including paving, signage, lighting and street furniture), landscape, views, traffic and movement, new building, building maintenance, historic detailing and materials, and sustainability. In this respect, the documents will be an essential source of evidence during the next stages of the SEA process.

Locally important heritage features

It should be noted that not all the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are important by local communities. For example, open spaces and key distinctive buildings are likely to have a local historic value.

Accessed via the Heritage Gateway⁹⁰, the Cornwall and Scilly Historic Environmental Record (HER) identifies the important distinctive structures or features that positively contribute to the local distinctiveness and sense of place of the neighbourhood area. Following a high-level review of the HER, there are 683 records within the neighbourhood area, including many Post-Medieval and Medieval features associated with the former mining industry. These features are viewable on Cornwall Interactive Mapping and this mapping tool will be utilised during the subsequent stages of the SEA process⁹¹. An image still from the mapping tool is provided below in **Figure A5.1**, specifically showing the location of shafts and adits, mines, and engine houses associated with Redruth's mining heritage.

⁹⁰ Heritage Gateway (2020): 'Detailed Search' [online database] available to access via: https://www.heritagegateway.org.uk/gateway/

⁹¹ Cornwall Council (2020): 'Cornwall Interactive Mapping Tool', [online]

https://map.cornwall.gov.uk/website/ccmap/?zoomlevel=18xcoord=1626908ycoord=643808wsName=ccmap&layerName=>

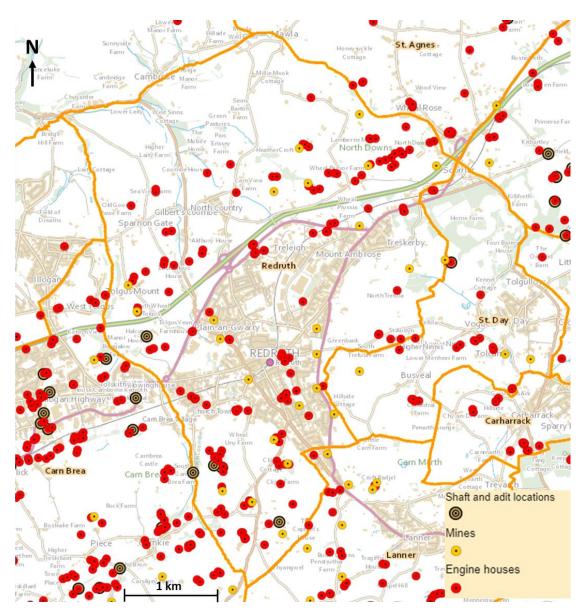


Figure A5.1: Locally important mining heritage features within the neighbourhood area (adapted from Cornwall Council's Interactive Map)

During the subsequent stages of the SEA process, the Cornwall and Scilly HER will be reviewed in greater detail to determine which heritage features are likely to be impacted by the preferred development strategy within the Neighbourhood Plan (and reasonable alternatives).

These heritage considerations (alongside any suggested mitigation measures or recommendations) will be presented in the Environmental Report accompanying the Neighbourhood Plan at Regulation 14 consultation.

Heritage at risk

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. According to the 2020 Heritage at Risk Register for South West England⁹², there are 249 heritage assets at risk

⁹² Historic England (2020): 'Heritage at Risk Register: South West England' [online] available to access via: https://historicengland.org.uk/images-books/publications/har-2020-registers/

within Cornwall, two of which are within the boundaries of the neighbourhood area. Specifically:

- Sara's Foundry (Grade II* listed building): the buildings continue to deteriorate
 and are in a very bad condition. No current solution is in place to prevent
 further deterioration, with discussions on going between Historic England and
 Cornwall Council.
- Tolgus arsenic works 80m south east of East Tolgus House (Scheduled Monument): classified as having a generally unsatisfactory and declining condition with major localised problems.

It is important to recognise that the Heritage at Risk Registers for areas outside of London do not contain information about the status of Grade II listed buildings. As such, it is currently not possible to determine whether any of the Grade II listed buildings within the neighbourhood area are at risk.

Summary of Future Baseline

New development areas in the neighbourhood area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout, and increasing the impacts of traffic within conservation areas. It should be noted, however, that existing historic environment designations offer a degree of protection to heritage assets and their settings.

Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the neighbourhood area there may be opportunity for new development to enhance the historic setting of the parish's settlements, support historic landscape character and better reveal assets' heritage significance.

A.6 Land, soil and water resources

Policy Context

The EU's Soil Thematic Strategy⁹³ presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

Adopted in October 2000, the purpose of the EU Water Framework Directive (WFD) is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater, driving a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems.
- Promote the sustainable use of water.

⁹³ European Commission (2006): 'Soil Thematic Policy', [online] available to access via: http://ec.europa.eu/environment/soil/index_en.htm

- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances.
- Ensure the progressive reduction of groundwater pollution; and
- Contribute to achieving 'good' water quality status for as many waterbodies as possible by 2027.

Key messages from the NPPF include:

- 'Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - i. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and
 - ii. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- 'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.'
- 'Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.'
- Planning policies and decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs', and 'promote and support the development of underutilised land and buildings.'
- Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.

Along with the policies contained within Chapter 1 'Using and managing land sustainably' and Chapter 4 'Increasing resource efficiency, and reducing pollution and waste', Goal 2 'Clean and plentiful water', Goal 5 'Using resources from nature more sustainably and efficiently' and Goal 8 'Minimising waste' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the Land, Soil and Water Resources SEA theme.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England⁹⁴, which sets out a vision for soil use in England, and the Water White Paper⁹⁵, which sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

In terms of waste management, the Government Review of Waste Policy in England⁹⁶ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials. The National Waste Management Plan⁹⁷ provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive⁹⁸. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.

River Basin Management Plans (RBMPs) set out a framework for how all river basin stakeholders, including water companies and local communities, can help improve the quality of the water environment. There are eight RBMPs in England which all have a harmonised plan period of 2015-2021 and are reviewed every five years. Redruth fall within the South West River Basin District and the Management Plan provides a framework for protecting and enhancing the benefits provided by the water environment⁹⁹.

The Cornwall Local Plan: Strategic Policies were adopted in November 2016. Objective 9(b) within key theme number 4 states to 'make the best use of our resources by maximising the use of previously used land'. Furthermore, in regard to the 28 policies listed within the document, the following directly relate to Land, Soil and Water Resources.

- Policy 14: Renewable and low carbon energy.
- Policy 15: Safeguarding renewable energy.
- Policy 17: Minerals general principles.
- Policy 18: Minerals safeguarding.
- Policy 19: Strategic waste management principles.
- Policy 20: Managing the provision of waste management facilities.
- Policy 21: Best use of land and existing buildings
- Policy 25: Green infrastructure; and
- Policy 26: Flood risk management and coastal change.

⁹⁴ Defra (2009): 'Safeguarding our Soils: A strategy for England', [online] available to access via: https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england

Defra (2011): 'Water for life (The Water White Paper)', [online] available to access via: http://www.official-

documents.gov.uk/document/cm82/8230/8230.pdf

96 Defra (2011): 'Government Review of Waste Policy in England', [online] available at: http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf

⁹⁷ DEFRA (2013) Waste Management Plan for England [online] available to access via:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-wastemanagement-plan-20131213.pdf 98 Directive 2008/98/EC

⁹⁹ Environment Agency (2015): 'South West River Basin Management Plan', [online] available to access via: https://www.gov.uk/government/collections/river-basin-management-plans-2015

The Minerals Safeguarding DPD (2018) safeguards mineral resources and infrastructure for further use, expanding on the Strategic Policies. 100 Key aspects that the DPD covers include: safeguarding China clay, aggregates, building stone and metals; and mineral infrastructure.

Baseline Summary

Summary of Current Baseline

Soil resources

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality 'best and most versatile' agricultural land.

In terms of the location of the best and most versatile agricultural land, there is a corridor of Grade 3a land to the east of the town (adjacent to the A393) between Treskerby and Lanherne Farm. However, a detailed classification has not been undertaken for most of the areas of undeveloped land in the northern and southern sections of the neighbourhood area.

The provisional ALC dataset provided by Natural England indicates that the undeveloped areas in the southern section of the neighbourhood area are primarily underlain by Grade 4 (poor) agricultural land. However, the undeveloped areas of land within the northern section of the neighbourhood area are predominantly underlain by areas of Grade 3 (good to moderate) agricultural land. The neighbourhood area therefore has the potential to contain some of the best and most versatile land for agricultural purposes¹⁰¹.

However, in the absence of a detailed ALC assessment it is currently not possible to determine whether the Grade 3 areas can be classified as Grade 3a (i.e. best and most versatile land) or Grade 3b land.

The results of the 'Predictive Best and Most Versatile (BMV) Land Assessment' for South West England 102 provided by Natural England indicates that most of the undeveloped areas of land in the northern section of the neighbourhood area have a high likelihood (greater than 60%) of containing BMV land. The undeveloped areas of land within the southern section of the neighbourhood area have a low likelihood (less than 20%) of containing BMV land.

Water resources and quality

The neighbourhood area is located within the South West River Basin District, overlapping with the 'Hayle Red River and Northern Streams' Operational Catchment. There are nine waterbodies within the Operational Catchment, including the Portreath Stream which passes through the central, western and north western sections of the neighbourhood area. Additional water resources located

¹⁰⁰ Cornwall Council (2018) Minerals Safeguarding Development Plan Document [online] available at:

https://www.cornwall.gov.uk/media/36180980/minerals-safeguarding-dpd-adoption-december-2018e.pdf

101 Natural England (2011): 'Regional ALC Classification Map for South West England', [online] available to access via:

http://publications.naturalengland.org.uk/publication/144017?category=5954148537204736

¹⁰² Natural England (2017): 'Likelihood of BMV Agricultural Land: Strategic Scale Map for South West England', [online] available to access via: http://publications.naturalengland.org.uk/publication/5624668800679936?category=5208993007403008

within and within proximity to the neighbourhood area include small ponds and drainage ditches alongside field margins.

As shown on the Environment Agency's Catchment Data Explorer, the most recently completed water quality assessments undertaken in 2019 classifies the Portreath Stream as having a 'moderate' ecological status and a 'fail' chemical status¹⁰³. The reasons for not achieving good status (RNAGs) are primarily attributed to diffuse and point source pollution from abandoned mines, including from nickel, zinc, copper, and cadmium.

The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater have nitrate concentrations of more than 50 mg/l nitrate or are thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs) within which, Member States are required to establish Action Programmes to reduce and prevent further nitrate contamination. In this regard, a small area of land within the eastern section of the Neighbourhood Plan overlaps with the 'Truro, Tresillian and Falmouth' Eutrophic Water NVZ.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. In this respect, there are no SPZs within or adjacent to the neighbourhood area.

Mineral resources

Mineral resources are defined as natural concentrations of minerals or, in the case of aggregates, bodies of rock that are, or may become, of potential economic interest due to their inherent properties. They make an essential contribution to the country's prosperity and quality of life. Since minerals are a non-renewable resource, minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance¹⁰⁴. In this respect, sections of land within the neighbourhood area overlap with a Metals MSA, as shown below.

¹⁰³ Environment Agency (2020): 'Catchment Data Explorer – Portreath Stream Overview', [online] available to access via: https://environment.data.gov.uk/catchment-planning/WaterBody/GB108049000620

¹⁰⁴ GOV.UK (2014): 'Minerals Guidance', [online] available to access via: https://www.gov.uk/guidance/minerals

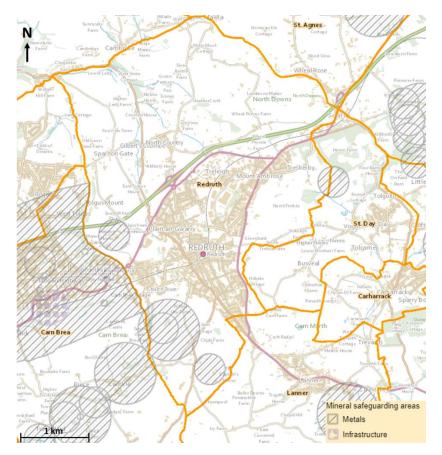


Figure A6.1: MSAs in Redruth (adapted from Cornwall Council's Interactive Map)

Summary of Future Baseline

Future development has the potential to affect water quality through diffuse pollution, wastewater discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the neighbourhood area and wider area.

Due to the likely prevalence of BMV agricultural land within sections of the undeveloped areas of the neighbourhood area, new developments which are located outside of the settlements will likely lead to losses of higher quality (best and most versatile) agricultural land.

A.7 Population and community

Policy Context

Key messages from the NPPF include:

 One of the three overarching objectives of the NPPF is a social objective to; 'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'

- To support the Government's objective of significantly boosting the supply of housing, strategic policies 'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
- In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a 'sufficient choice of school places' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change¹⁰⁵ warns that society is underprepared for an ageing population. The report states that 'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving

¹⁰⁵ Select Committee on Public Service and Demographic Change (2013): 'Ready for Ageing?', [online] available to access via: http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/

as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

The Cornwall Local Plan: Strategic Policies were adopted in November 2016. All of the six objectives within key themes 1 and 2 directly relate to population and communities. Furthermore, in regard to the 28 policies listed within the document, the following are relevant to this SEA theme:

- Policy 3: Role and function of places.
- Policy 4: Shopping, services and community facilities.
- Policy 5: Business and tourism; and
- Policy 27: Transport and accessibility.

Baseline Summary

Summary of Current Baseline

Population

Table A7.1 below shows the change in population between the period of 2001 and 2011. The neighbourhood area saw an increase in population of approximately 13.5% between this period. This is at least 5% greater than the comparative increases observed for Cornwall, South West England, and England during this period.

Table A7.1: Population change between 2001 and 2011¹⁰⁶

| Population change between 2001 and 2011 | Redruth | Cornwall | South West | England |
|--|---------|----------|------------|------------|
| 2001 | 12,352 | 499,114 | 4,928,434 | 49,138,831 |
| 2011 | 14,018 | 532,273 | 5,288,935 | 53,012,456 |
| % Population change | +13.5% | +6.6% | +7.3% | +7.9% |

Based on mid-2019 population estimates, the total population of the neighbourhood area has grown to 15,502 residents, a further increase of approximately 10.6% since 2011 levels.

The Steering Group highlight that population growth is not evenly spread across the neighbourhood area. With reference to individual wards, 'Redruth North' is growing and is anticipated to continue growing at twice the rate of 'Redruth Central' and 'Redruth South'.

Age structure

Table A7.2 (overleaf) shows the distribution of residents within the neighbourhood area in line with age. The largest group of residents in the neighbourhood area are in the 60+ age category (25.8%). However, this is lower than the totals for Cornwall (29.7%), South West England (26.4%) and England (22.3%).

¹⁰⁶ ONS (2011) Tables KS001 (2001) and KS101EW (2011)

The total percentage of working age residents within the Neighbourhood Plan (i.e. those within the 25-44 and 45-59 age categories) is 45.2%. This is higher than the totals for Cornwall (43.4%) and South West England (44.7%) but lower than the total for England (46.9%).

Regarding the younger age categories, 29.1% of residents within the neighbourhood area are under 25 years old. This is higher than the totals for Cornwall (27.0%) and South West England (28.9%) but lower than the total for England (30.8%).

Table A7.2: Age Band (% of total)¹⁰⁷

| Age Band (% of total) | Redruth | Cornwall | South West | England |
|-----------------------|---------|----------|------------|------------|
| 0-15 | 18.8% | 16.9% | 17.5% | 18.9% |
| 16-24 | 10.3% | 10.1% | 11.3% | 11.9% |
| 25-44 | 25.7% | 22.5% | 24.6% | 27.5% |
| 45-59 | 19.5% | 20.8% | 20.1% | 19.4% |
| 60+ | 25.8% | 29.7% | 26.4% | 22.3% |
| Total population | 14,018 | 532,273 | 5,288,935 | 53,012,456 |

Household deprivation

For those households which demonstrate deprivation in the neighbourhood area, most are deprived in one dimension. This is shown below in **Table A7.3** below and is similar to the regional and national trends. A higher percentage of households in the neighbourhood area are deprived in at least two dimensions in comparison to the regional and national trends.

Table A7.3: Household Deprivation¹⁰⁸

| Household Deprivation (% of total) | Redruth | Cornwall | South West | England |
|--|---------|----------|---------------|---------|
| Household not deprived in any dimension | 36.7% | 40.2% | 44.8% | 42.5% |
| Deprived in 1 dimension | 32.9% | 34.6% | 33.2% | 32.7% |
| Deprived in 2 dimensions | 23.1% | 19.9% | 17.6% | 19.1% |
| Deprived in 3 dimensions | 6.3% | 4.8% | 4.0% | 5.1% |
| Deprived in 4 dimensions | 1.1% | 0.5% | 0.4% | 0.5% |

Index of Multiple Deprivation

The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to

¹⁰⁷ ONS (2011) Table KS102EW

¹⁰⁸ ONS (2011) Table QS119EW

their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- Education, Skills and Training: The lack of attainment and skills in the local population.
- Health Deprivation and Disability: The risk of premature death and the
 impairment of quality of life through poor physical or mental health.
 Morbidity, disability and premature mortality are also considered, excluding
 the aspects of behaviour or environment that may be predictive of future
 health deprivation.
- Crime: The risk of personal and material victimisation at local level.
- Barriers to Housing and Services: The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
 - 'Geographical Barriers': relating to the physical proximity of local services
 - Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
 - 'Indoors Living Environment' measures the quality of housing.
 - 'Outdoors Living Environment' measures air quality and road traffic accidents.
- Two supplementary indices (subsets of the Income deprivation domains), are also included:
 - Income Deprivation Affecting Children Index: The proportion of all children aged 0 to 15 living in income deprived families.
 - **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs) ¹⁰⁹ are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being

¹⁰⁹ DCLG (2019): Indices of Deprivation Explorer', [online] available from: http://dclgapps.communities.gov.uk/imd/iod_index.html#

the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

In this respect, a map of the IMD in the neighbourhood area is shown in **Figure A7.1** (below). The 'warmer' colours show more deprived populations in the neighbourhood area and the 'cooler' colours show less deprivation. In this respect, most of the neighbourhood area contains some of the most deprived areas in England. In particular, the areas of land within and surrounding Redruth town centre are some of the top 10% most deprived areas in England.

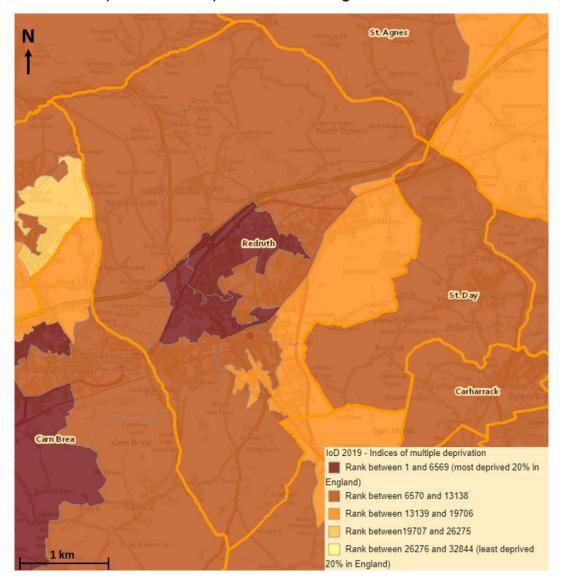


Figure A7.1: Levels of deprivation within the neighbourhood area

Housing tenure

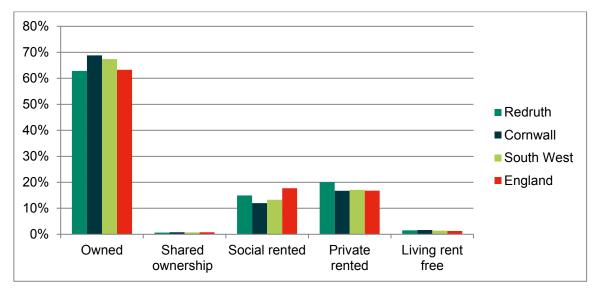


Figure A7.2: Household tenure¹¹⁰

Figure A7.2 (above) shows household tenure in the neighbourhood area. Most residents in the neighbourhood area own their own homes. However, the total for the neighbourhood area (62.8%) is lower than the totals for Cornwall (68.8%), South West England (67.4%) and England (63.3%). A higher percentage of residents in the neighbourhood area live within socially rented or privately rented accommodation in comparison to the regional and national trends.

Education

Figure A7.3 below presents the highest level of qualification for residents in the neighbourhood area. Most residents in the neighbourhood area hold qualifications. However, the percentage of residents with no qualifications (26.7%) is higher than the regional and national totals. Fewer residents in the neighbourhood area (19.8%) have a level 4 qualification or above, in comparison to the totals observed for Cornwall (25.0%), South West England (27.4%) and England (27.4%).

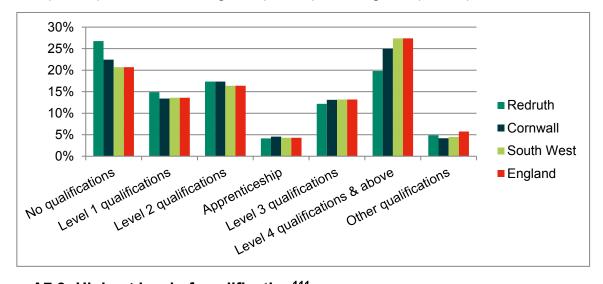


Figure A7.3: Highest level of qualification¹¹¹

¹¹⁰ ONS (2011) Table QS405EW

¹¹¹ ONS (2011) Table QS501EW

The existing education offer within the neighbourhood area includes three primary schools and one secondary school, specifically: Pennoweth Primary School, Treleigh Community Primary School, Trewirgie Infant School and Junior School, and Redruth School and Technical College. There are approximately seven nurseries / preschools (based on a Google search).

Employment and Economy

Figure A7.4 (below) shows occupations within the neighbourhood area as a percentage of those employed. The most representative occupational bands of residents in Redruth are:

- Skilled trades occupations (15.4%).
- Elementary occupations (13.9%); and
- Caring, leisure and other service occupations (12.2%).

In total, approximately 41.4% of working residents within the neighbourhood area are employed in one of the three occupation categories listed above. This is higher than the totals for Cornwall (39.5%), South West England (34.2%) and England (31.8%). Fewer residents are employed in the following three occupation categories in comparison to the regional and national trends:

- Managers, directors and senior officials.
- Professional occupations; and
- Associate professional and technical occupations.

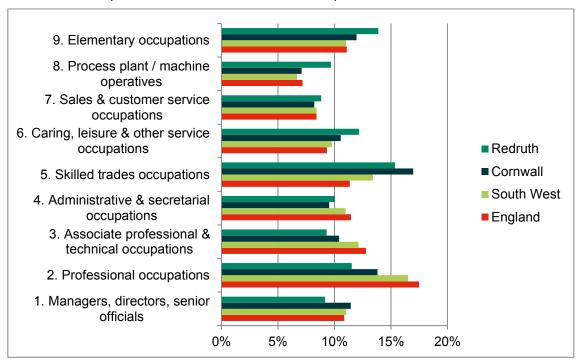


Figure A7.4: Occupations in the neighbourhood area¹¹²

Key employment sites within the neighbourhood area include Redruth town centre, Cardrew Industrial Estate, and Treleigh Industrial Estate. Additionally, Krowji (the largest creative hub in Cornwall) provides studios, workspaces, offices, meeting

¹¹² ONS (2011) Tables KS608EW and KS610EW

rooms and other facilities for a wide range of businesses at the Old Grammar School buildings in Redruth.

The South West is the most visited region in the UK with approximately 21 million domestic visitors in 2017 contributing £4.5 billion to the UK economy. In this respect, the visitor economy is also an important sector for the neighbourhood area. The existing tourism offer focuses on the town's heritage assets and the World Heritage Site.

Community assets and infrastructure

There are several community assets and facilities within the neighbourhood area, including (but not limited to): allotments, sports clubs (rugby, tennis and cricket), Redruth Community Centre, churches, village shops, public houses, Kreson Kernow (museum), Redruth Library, and the Regal Cinema & Theatre. Additional community assets and facilities within the town centre includes restaurants and supermarkets.

Summary of Future Baseline

As the population of the neighbourhood area continues to age, this could potentially negatively impact upon the future vitality of the local community in certain parts of the neighbourhood area, whilst also placing additional pressures to existing services and facilities.

The suitability (e.g. size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies through the Local Plan and Neighbourhood Plan. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.

Additionally, there are opportunities to improve public transport networks within the neighbourhood area in order to facilitate for more sustainable modes of transport whilst alleviating pressures on main road networks. Similarly, the provision of infrastructure to promote at home (i.e. remote) working is likely to positively contribute towards these aims (particularly during the recovery from the COVID-19 pandemic).

A.8 Health and wellbeing

Policy Context

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; 'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.
- 'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure,

sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'

- Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives¹¹³ ('The Marmot Review') investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that that there is: "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities".

Health Equity in England: The Marmot Review 10 Years On (2020) has been produced by the Institute of Health Equity and commissioned by the Health Foundation to mark 10 years on from the landmark study Fair Society, Healthy Lives (The Marmot Review).¹¹⁴

The report highlights that:

- people can expect to spend more of their lives in poor health.
- improvements to life expectancy have stalled and declined for the poorest 10% of women.
- the health gap has grown between wealthy and deprived areas, and
- place matters for example living in a deprived area of the North East is worse for your health than living in a similarly deprived area in London, to the extent that life expectancy is nearly five years less.

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

Public Health England (PHE) has a key role in shaping health policy and practice across the country. In 2017 the organisation published 'Spatial Planning for Health: An evidence resource for planning and designing healthier places'. The review

¹¹³ The Marmot Review (2011): 'The Marmot Review: Implications for Spatial Planning', [online] available to access via: https://www.nice.org.uk/media/default/About/what-we-do/NICE-guidance/NICE-guidelines/Public-health-guidelines/Additional-publications/Spatial-planning/the-marmot-review-implications-for-spatial-planning.pdf

¹¹⁴ Health Equity in England: The Marmot Review 10 Years on (2020) [online] available to access via https://www.bealth.org.uk/publications/reports/the-marmot-review-10-years-on

https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on 115 Public Health England (2017) Spatial Planning for Health An evidence resource for planning and designing healthier places

provides guidance on the role of the built and natural environment in shaping health impacts. The review also explores the impacts of neighbourhood design, provision of housing, transport and the natural environment on public health. Additionally, in 2018 PHE produced a 'Healthy High Streets' 116 briefing which highlights how health inequalities can be addressed in the design of the built environment.

The Cornwall Local Plan: Strategic Polices were adopted in November 2016. Objective 7 within key theme number 3 states to 'meet a wide range of local needs in order to improve quality of life and reduce social exclusion'. Objective 8 within key theme number 3 states to 'promote development that contributes to a healthy and safe population by providing and ensuring the appropriate levels of open space and the protection and improvement of air quality'. Furthermore, regarding the 28 policies listed within the document, the following are relevant to the Health and Wellbeing SEA theme:

- Policy 12: Design.
- Policy 16: Health and wellbeing; and
- Policy 25: Green infrastructure.

Baseline Summary

Summary of Current Baseline

Green Infrastructure Networks

Health is a cross-cutting topic and there are natural synergies with other SEA themes including climate change, population and communities and transport. This is particularly the case in relation to green infrastructure, which is a key aspect of all these themes thanks to its multi-functionality. Green infrastructure provides space – including natural green space – for recreation and relaxation, and access to nature has been evidenced to improve people's health and wellbeing, through encouraging healthy outdoor recreation and relaxation.

In this respect, locally important open spaces contributing to the green infrastructure network within the neighbourhood area include (but is not limited to): Treskerby Wood, Fairfields Park, Saint Day Road Cemetery, Trewirgie Cemetery, Gwealan Tops Adventure Playground, Trefusis Park, and Victoria Park.

Joint Strategic Needs Assessment for Cornwall

Reflecting the outcomes of the JSNA for Cornwall, the 2017 Health Profile for the 'Camborne, Pool, Illogan and Redruth' Community Network Area¹¹⁷ (CNA) contains a variety of key statistics which help to build an understanding of the community needs. In doing so, the aim of the profile is to help identify where resources could be targeted to improve health and wellbeing and reduce health inequalities. The CNA comprises ten parishes in total. Key statistics include:

[online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf

¹¹⁶ Public Health England (2018): 'Healthy High Streets: Good Place-Making in an Urban Setting', [online] available to access via: https://www.gov.uk/government/publications/healthy-high-streets-good-place-making-in-an-urban-setting

¹¹⁷ Cornwall Council (2017): Health Profile for Caradon CNA', [online] available to download via:

https://www.cornwail.gov.uk/health-and-social-care/public-health-cornwall/joint-strategic-needs-assessment-jsna/community-and-health-based-profiles/community-network-health-profiles/

- 31% of children measures in the National Child Measurement Programme were found to be overweight or obese.
- 40% of elderly people (over 65-year-olds) live alone, compared to 39% across Cornwall.
- One in four residents live in the 20% most deprived neighbourhoods in England which are known to have the poorest health outcomes; and
- 30.2% of adults are classified as inactive, with a further 15.1% classified as insufficiently active.

Indicators of health and wellbeing

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing. **Figure A8.1** below shows general health within the neighbourhood area. Around 77.1% of residents in the neighbourhood area demonstrate at least 'good health', lower than the totals for Cornwall (78.8%), South West England (81.4%) and England (81.4%). The percentage of residents that have 'bad' health or worse in the neighbourhood area (8.0%) is higher than the regional and national trends.

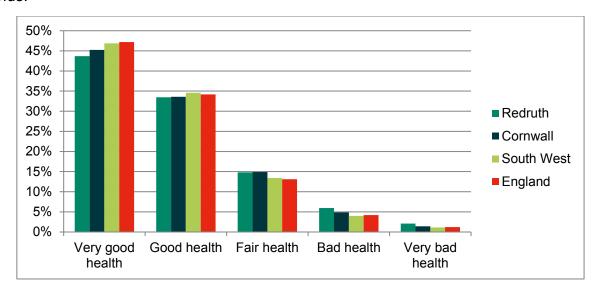


Figure A8.1: General health¹¹⁸

Based on 2011 Census data (shown below in **Table A8.1**), approximately 22.4% of residents in the neighbourhood area report that their daily activities are limited in some way. This is higher than the totals for Cornwall (21.4%), South West England (18.5%) and England (17.6%).

Table A8.1: Disability¹¹⁹

| | Redruth | Cornwall | South West | England |
|-------------------------------|---------|----------|------------|---------|
| Activities limited 'a lot' | 11.4% | 10.0% | 8.3% | 8.3% |
| Activities limited 'a little' | 11.0% | 11.4% | 10.2% | 9.3% |

¹¹⁸ ONS (2011) Table KS301EW

¹¹⁹ ONS (no date): Census 2011: 'Long-term Health Problem or Disability 2011' (Table QS303EW)

| | Redruth | Cornwall | South West | England |
|--------------------------|---------|----------|------------|---------|
| Activities 'not limited' | 77.6% | 78.6% | 81.6% | 82.4% |

Released in 2014, Cornwall Council's Residents' Survey¹²⁰ was distributed to 2,973 households across the county, with 44% valid surveys returned. The minimum of 50 surveys for each of the 19 CNAs across Cornwall were completed, with the aim of the survey to assess residents' satisfaction and quality of life. Results from the survey include:

- Regarding quality of life, the following factors were deemed most important and in most need of improvement: wage levels and cost of living, affordable decent housing, road and pavement repairs, job prospects and public transport.
- 35.7% of respondents were 'very satisfied' with their local area as a place to live; and
- 48.0% of respondents were 'fairly satisfied' with their local area as a place to live

Health services

There are two main GP surgeries within the neighbourhood area, specifically: Manor Surgery and Clinton Road Surgery¹²¹. Based on a recent community survey undertaken on behalf of the Neighbourhood Plan Steering Group, 45% of households confirmed that at least one member of the household was registered with Manor Surgery. A further 25% of households reported that at least one member of the household was registered with Clinton Road Surgery. Most respondents confirmed that they were registered at a local surgery, with just 4% registered outside of Redruth by necessity. For households with more than one occupant, 83% reported that all household members were registered at the same GP surgery. Both surgeries have issues with capacity.

Nursing home provision within the neighbourhood area is relatively limited. However, there are eight care homes (without nursing) in Redruth, including: The Green, Garsewednack Residential Home, Albany House, Trefusis, Hillcrest, Silverdale, Acorn Park Lodge, and Clinton Lodge.

Located along Miners Row (directly to the north of Redruth town centre), Miners Court is currently the only Extra Care Unit in Mid and West Cornwall. It has Care and Support Assistants on-site 24 hours a day and is designed to allow residents to live independently in self-contained homes, whilst having the reassurance of full-time on-site care and support.

The HNA has established the need for affordable homes, housing for older people & housing for specialist needs, many of which tend to be smaller dwellings.

Summary of Future Baseline

Health and wellbeing levels within the neighbourhood area are generally good, with a high percentage of residents reporting 'good' or 'very good' health, and a low

¹²⁰ Cornwall Council (2014): 'Cornwall Council Residents' Survey', [online] available to download via: https://www.cornwall.gov.uk/media/9215380/residents-survey.pdf

¹²¹ The surgeries merged in 2022 to form Leatside Surgery.

percentage of residents reporting that their activities are limited in some way. However, these levels are lower than the regional and national trends.

An ageing population within the neighbourhood area may increase the reported cases of disability, reduce the levels of good health, and place future pressures on health services in the wider area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing to key population groups (i.e. elderly population).

Obesity is also seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

Poor mental health is associated with low long term life quality, a larger number of hospitalisations and deaths. Experts indicate that problems surrounding the worsening of mental health, including secondary dependencies such as alcoholism are likely to worsen over time without suitable changes within communities.

A.9 Transportation

Policy Context

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth. Key messages from the NPPF include:

- 'Transport issues should be considered from the earliest stages of planmaking and development proposals, so that:
- The potential impacts of development on transport networks can be addressed.
- Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised.
- Opportunities to promote walking, cycling and public transport use are identified and pursued.
- The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and
- Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.'
- 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'

Each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. 'Connecting Cornwall 2030'¹²² is the third LTP for Cornwall. The plan is a strategic policy tool through which the council exercises its responsibilities for planning, management and the development of transport in the county. The vision of the plan is that by 2030 'transport in Cornwall will be excellent, with the transport system connecting people, communities, businesses and services in a way that is reliable, efficient, safe, inclusive and enjoyable'. In order to achieve this goal, the LTP is supported by implementation plans that cover 3–4-year periods up until 2030, with the most recent plan covering the period 2019-2021.

The Cornwall Local Plan: Strategic Policies were adopted in November 2016. Objective 8 within key theme number 3 states to 'promote development that contributes to a healthy and safe population by providing for opportunities for walking and cycling'. Furthermore, in regard to the 28 policies listed within the document, Policy 27 'Transport and accessibility' is directly relevant to the Transportation SEA theme.

Baseline Summary

Summary of Current Baseline

Rail network

Cornwall's rail network comprises the mainline service which runs between Penzance, Camborne, Redruth, Truro, St Austell, Bodmin Parkway, Liskeard, Saltash and Plymouth (and beyond to Exeter, Taunton, Bristol, the Midlands/the North, Reading and London Paddington), and five branch lines. There is usually one service per hour, and the neighbourhood area is relatively well connected by rail.

Bus network

Bus networks play a key role in terms of the public transport provision across Cornwall. The current bus network provides an important transport link for those people without access to a car. With reference to the neighbourhood area, there are three key services operated by Kernow, as follows¹²³:

- T1/T2: Penzance St Ives Camborne Truro (via Hayle and Redruth).
- U2: Falmouth Redruth (via Penryn, Penryn Campus and Lanner); and
- 201: Camborne Truro College (via Redruth).

Services are relatively frequent and pass through the town centre, with stops including Redruth Railway Station and Mount Ambrose.

Road network and congestion

The Strategic Road Network in Cornwall comprises the A30, which links Penzance, Camborne, Redruth, Bodmin, Launceston with Exeter and beyond, and the A38, which links the A30 at Bodmin with Liskeard and Plymouth. With reference to the neighbourhood area, the A30 passes to the north of the Redruth town centre and is accessible via the A3047 and A393 (on approach from the town). The A3047

¹²² Cornwall Council (2019): 'Connecting Cornwall LTP 2030': < https://www.cornwall.gov.uk/transport-and-streets/transport-policy/local-transport-plan-connecting-cornwall-2030/>

policy/local-transport-plan-connecting-cornwall-2030/>

123 Kernow (2020): 'Timetables – Redruth', [online] available to access via: https://www.firstgroup.com/cornwall/plan-journey/timetables/?operator=6&service=redruth&page=1&redirect=no

extends to the west of the neighbourhood area for approximately 5km and connects Redruth to Camborne. The A393 passes along the eastern boundary of the town, extending for approximately 10km to the south east on approach to Penryn (where it joins the B3292).

The northern section of the neighbourhood area is relatively rural in character and is therefore less well connected in comparison to the central and southern sections (which encompass the town). The B3300 passes through the centre of the neighbourhood area (north to south) and provides connectivity to the neighbouring settlements of Portreath (to the north west) and Lanner (to the south east). Accessible at the southern boundary of the town, the B3297 extends southwards for approximately 12km where it connects to Helston.

While road congestion in Cornwall is not yet at a comparable level to that regularly experienced in many other areas, increased population levels and rapid economic and employment growth have led to an increased demand to travel that is impacting on the county's traffic levels, in particular, on the approaches to the main urban centres. This has resulted in a higher rate of increase in traffic flows and there is now an emerging pattern of congestion on key corridors serving Cornwall, with increasing delays and journey times and increasing seasonal congestion and peak period delays.

The results of a recent community survey indicated that 42% of Redruth's residents consider the existing road infrastructure to be somewhat or completely inadequate to sustain future developments. Those unhappy with the road infrastructure describe access and layout being inadequate, traffic congestion and delays, and problems with traffic planning and constant road works.

Public rights of way network

The neighbourhood area is relatively well served by a network of footpaths and cycle paths, as shown overleaf in **Figure A9.1**. Additionally, the Mining Trail Network centred around Camborne and Redruth offers approximately 60km of adventure and discovery for walkers, cyclists and horse riders. In this respect, parts of the Tolgus Trail, Coast to Coast Trail, and the Redruth & Chasewater Railway Trail pass through the neighbourhood area¹²⁴. However, the Neighbourhood Plan Steering Group note that cycle routes and footways often do not join up and have areas where connections do not exist.

¹²⁴ Cornwall Council (2019): Mining Trails Leaflet', [online] available to access via: https://www.cornwall.gov.uk/media/42421657/mining-trails-a2-leaflet nov19 web.pdf

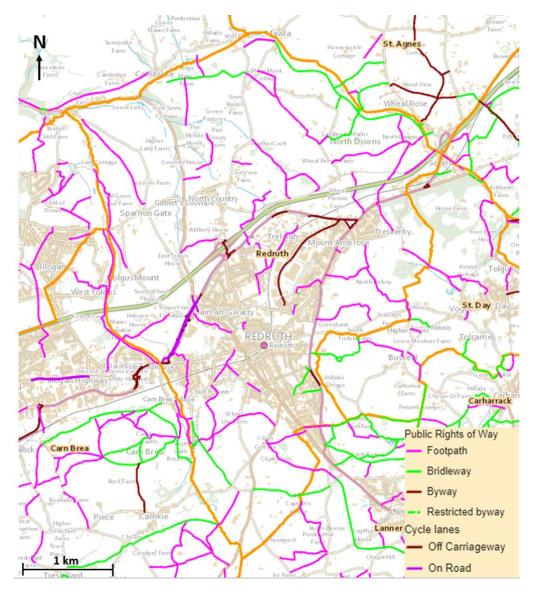


Figure A9.1: PRoW and cycle lanes within the neighbourhood area (adapted from Cornwall Council's Interactive Map)

Access to cars and vans

Figure A9.2 shows car and van ownership within the neighbourhood area. Based on the 2011 census data shown, 79.2% of households in the neighbourhood area have access to at least one car or van, lower than the totals for Cornwall (82.7%) and the South West of England (81.1%) but higher than the total for England (74.2%).

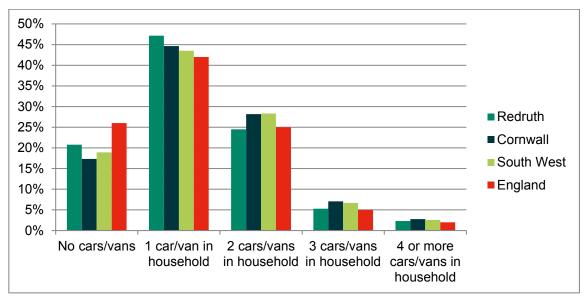


Figure A9.2: Car and Van ownership in the neighbourhood area¹²⁵

Method of travel to work

The most common form of travel to work for Redruth residents is via car or van (43.0%), higher than the totals for Cornwall (40.6%), South West England (41.4%) and England (37.0%). A total of 11.5% of residents in the neighbourhood area choose to travel to work on foot, by cycle, by train, or by bus, minibus or coach. This is similar to the total for Cornwall (12.0%) but lower than the totals for South West England (15.5%) and England (17.0%). This is shown below in **Figure A9.3**.

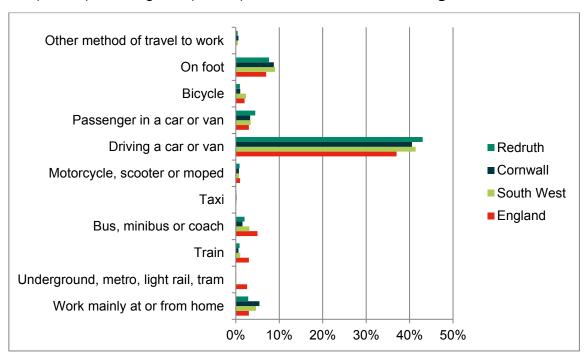


Figure A9.3: Method of travel to work¹²⁶

¹²⁵ ONS (2011): Table KS404EW

¹²⁶ ONS (2011) Table QS701EW

Summary of Future Baseline

New development has the potential to increase traffic and cause congestion within the neighbourhood area, principally at junctions on key routes. This is likely to continue to be more pronounced during peak times (i.e. rush hours). This is significant in the local context, due to the pressures from the local road network.

However, development within the neighbourhood area has the potential to lead to enhancements to the transport network in order to promote more sustainable modes of travel, such as the existing pedestrian and cycle network.

Additionally, there are opportunities to improve public transport networks within the neighbourhood area in order to facilitate for more sustainable modes of transport whilst alleviating pressures on main road networks. Similarly, the provision of infrastructure to promote at home (i.e. remote) working is likely to positively contribute towards these aims.

Whilst negative effects of new development on the transport network are likely to be mitigated in part by new infrastructure, there will be a continuing need for development to be situated in accessible locations