

Sustainability Appraisal (incorporating Strategic Environmental Assessment) for the Truro and Kenwyn Neighbourhood Plan

**SA Report to accompany the
Submission version of the
Neighbourhood Plan**

Truro Neighbourhood Plan Steering Group

March 2022

Quality information

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Table of Contents

Non-Technical Summary	
1. Introduction	1
Background	1
SA explained	2
Structure of this SA Report.....	2
2. Local Plan context and vision for the Neighbourhood Plan	4
Local Plan context for the Neighbourhood Plan	4
Vision, aims and objectives for the Neighbourhood Plan	7
3. What is the scope of the SA?	8
SA Scoping Report.....	8
Key Sustainability Issues.....	9
SA Framework.....	10
4. What has plan making / SA involved up to this point?.....	14
Introduction	14
Overview of plan making / SA work undertaken since 2011	14
Growth to deliver through the Neighbourhood Plan	15
Assessment of reasonable alternatives for broad areas of growth.....	16
Current approach in the Neighbourhood Plan and the development of Neighbourhood Plan policies.....	31
5. What are the appraisal findings at this current stage?	34
Introduction	34
Approach to the appraisal	34
Air Quality.....	34
Biodiversity and Geodiversity	35
Climate Change	38
Landscape.....	40
Historic Environment	41
Land, Soil and Water Resources	53
Population and Community	54
Health and Wellbeing	57
Transportation	58
Conclusions at this current stage	60
6. Next Steps	61
Appendix A Context Review and Baseline	62

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Non-Technical Summary

What is a Sustainability Appraisal?

A sustainability appraisal (SA) has been undertaken to inform the Truro and Kenwyn Neighbourhood Plan. This process has been undertaken to meet the requirements of the Strategic Environmental Assessment Regulations.

Neighbourhood Plan groups use SA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan, and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the Truro and Kenwyn Neighbourhood Plan?

The Truro and Kenwyn Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. Replacing the Truro and Kenwyn Neighbourhood Plan which was 'made' in late 2016, the Neighbourhood Plan is being prepared in the context of the adopted Cornwall Local Plan.

The Neighbourhood Plan has been submitted to Cornwall Council for subsequent Independent Examination.

Purpose of this SA Report

This SA Report, which accompanies the submission version of the Neighbourhood Plan, is the latest document to be produced as part of the SA process. Earlier SA documents were prepared to accompany the previous version of the Neighbourhood Plan, including an SA Report which accompanied 'Regulation 14' consultation on the Neighbourhood Plan in early 2020.

The purpose of this SA Report is to:

- Identify, describe and evaluate the likely significant effects of the Truro and Kenwyn Neighbourhood Plan and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SA process which has been carried out to date.

The SA Report contains:

- An outline of the contents and main objectives of the Neighbourhood Plan 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;
- The SA Framework of objectives against which the Neighbourhood Plan has been assessed;
- The appraisal of alternative approaches for the Neighbourhood Plan;
- The likely significant environmental effects of the Neighbourhood Plan;

- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Neighbourhood Plan; and
- The next steps for the Neighbourhood Plan and accompanying SA process.

Assessment of reasonable alternatives for the Truro and Kenwyn Neighbourhood Plan

Growth to deliver through the Neighbourhood Plan

The overarching document for the Cornwall Local Plan, the *Cornwall Local Plan: Strategic Policies 2010-2030*¹ was adopted in November 2016. This sets out the land use policies to meet Cornwall's economic, environmental and social needs and aims for the future, and provides the framework for all subsequent documents prepared which form part of the Local Plan.

The *Strategic Policies* incorporates a housing target of 5,100 dwellings in the wider Truro and Roseland Community Network Area between 2010 and 2030, and 3,900 dwellings within Truro itself. At least 25,750 sq. m of B1a and B1b office floorspace and 21,667 sq. m of other B employment floorspace should also be delivered in the Community Network Area during the plan period.

Since 2010, permissions have been granted for around 4,100 dwellings in Truro and Kenwyn. As such the Local Plan housing target has already been met. Similarly, in terms of employment provision, a large proportion of the Local Plan's employment land provision has also already been delivered through permissions.

Whilst there is not a need for the Neighbourhood Plan to allocate additional sites, a key aim of the Neighbourhood Plan is to support the economic vitality of Truro and support growth which meets the diverse community needs of residents. In light of this, the intention of the Neighbourhood Plan is to provide policies for significant development at major areas of growth (including those with planning permissions), and to provide additional guidance on development quality and how development can help create more sustainable and efficient places to live.

To reflect this, the SA process has sought to inform the Neighbourhood Plan's decision-making process through considering the relative merits of taking forward growth at different locations around Truro and Threemilestone. The purpose of this appraisal is to inform the choices made through the Neighbourhood Plan relating to the type, layout and design of development to be taken forward in Truro and Kenwyn, including in association with major areas of growth.

To facilitate consideration of the relative merits of potential locations for growth in the Neighbourhood Plan, 18 broad areas, or 'segments', were mapped around surrounding the existing built up area of the settlements of Truro and Threemilestone. Broadly representing the 'points of the compass', the 18 segments were then evaluated, with a view to establishing the key constraints to development in each of these areas.

The findings of the appraisal are presented in Table 4.1 in the main body of the report, supported by Figure 4.1 to 4.4.

¹ Cornwall Council (2016): 'Cornwall Local Plan Strategic Policies 2010-2030', [online] available to download via: <<https://www.cornwall.gov.uk/localplan/cornwall>> last accessed [16/12/19]
Prepared for: Truro and Kenwyn Neighbourhood Plan Steering Group

Assessment of the submission version of the Truro and Kenwyn Neighbourhood Plan

The submission version of the Neighbourhood Plan presents 32 planning policies for guiding development in Truro and Kenwyn.

Key proposals include as follows:

- The Neighbourhood Plan sets out an urban extent boundary. Areas within this boundary include the sites for significant growth which have been either permitted or are proposed for allocation in conjunction with the provisions of the Cornwall Local Plan. These include Langarth and Pydar Street, and at the Old County Hall site.
- The Langarth site, located to the north of Threemilestone is identified by the Neighbourhood Plan for development as a sustainable community comprising a mix of high quality housing, public and private spaces and supporting infrastructure and facilities.
- The key employment districts in the Neighbourhood Plan area will be protected and enhanced to reflect their relevant strengths and opportunities, including: Truro City Centre; Newham industrial estate and the port of Truro; Threemilestone industrial estate; and Treliske employment area.
- Key city centre sites at Pydar Street, Moorfield car park and the former bus depot are identified and safeguarded for mixed use development.
- Land at Truro Railway Station and the former Cattle Dock at Claremont Terrace and the immediate viaduct area will be safeguarded for future rail related or transport use.
- Open spaces identified by the Truro and Threemilestone Landscape Strategy that make a significant contribution to public amenity by virtue of their landscape character, appearance and/or function have been locally protected.
- Land that provides important formal or informal recreational space or sports pitch facilities for the Neighbourhood Plan area are locally protected.

Utilising the SA Framework of objectives and assessment questions developed during the earlier scoping stage of the SA, the SA process has assessed the policies put forward through the current version of the Neighbourhood Plan. The SA Report has presented the findings of the assessment under the following SEA Themes:

- Air Quality
- Biodiversity and Geodiversity;
- Climate Change;
- Landscape
- Historic Environment;
- Land, Soil and Water Resources;
- Population and Community;
- Health and Wellbeing; and

- Transportation.

The assessment has concluded that the current version of the Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'Population and Community' SA theme. This relates to the focus of the Neighbourhood Plan on facilitating the delivery of growth which meets local needs, supporting economic vitality by enhancing the prospects for employment within Truro city centre, and on safeguarding and enhancing community infrastructure. The Neighbourhood Plan will also bring significant positive effects in relation to the 'Health and Wellbeing' SA theme, linked to its promotion of improved and accessible network of open spaces, its focus on sustainable transport and the enhancement of townscape quality.

Additionally, the Neighbourhood Plan will bring positive effects in relation to the 'Biodiversity and Geodiversity' SA theme through delivering multi-functional green infrastructure corridors through new development areas, retaining habitats, enhancing ecological networks and delivering net gains. However, the Habitats Regulations Assessment conclusions highlight that some Neighbourhood Plan policies could benefit from additional wording in order to safeguard the integrity of European designated sites.

The Neighbourhood Plan is also likely to lead to positive effects in relation to the 'Landscape' and 'Historic Environment' SA themes. These benefits largely relate to the Neighbourhood Plan's emphasis on protecting and enhancing the sense of place and identity of Truro and Kenwyn, supporting the quality of the public realm and townscape, and through incorporating high-quality and sensitive design through new development proposals which positively respond to local distinctiveness. However, given the approaches taken forward through the Neighbourhood Plan will help limit potential effects from new development areas rather than secure significant enhancements, these impacts are less likely to comprise significant positive effects overall. In addition, given the significance of the Round 200m north west of Penventinnie, it is recommended that the Neighbourhood Plan incorporates additional specific provisions for protecting the setting and sense and place of this scheduled monument. These include associated with the detailed heritage assessments undertaken as part of the Langarth planning applications.

Regarding the 'Climate Change' SA theme, the Neighbourhood Plan will potentially lead to positive effects through supporting development proposals which tackle flood risk issues, deliver renewable energy generating infrastructure and include low carbon energy sources to address the climate crisis. However, this is dependent on the extent to which development proposals incorporate these mitigation and adaptation measures through design. The Neighbourhood Plan will also initiate several beneficial approaches regarding the 'Transportation' SEA theme, given its focus on reducing traffic congestion, supporting a modal shift towards sustainable transport and by ensuring that new developments provide appropriate access to local services and facilities.

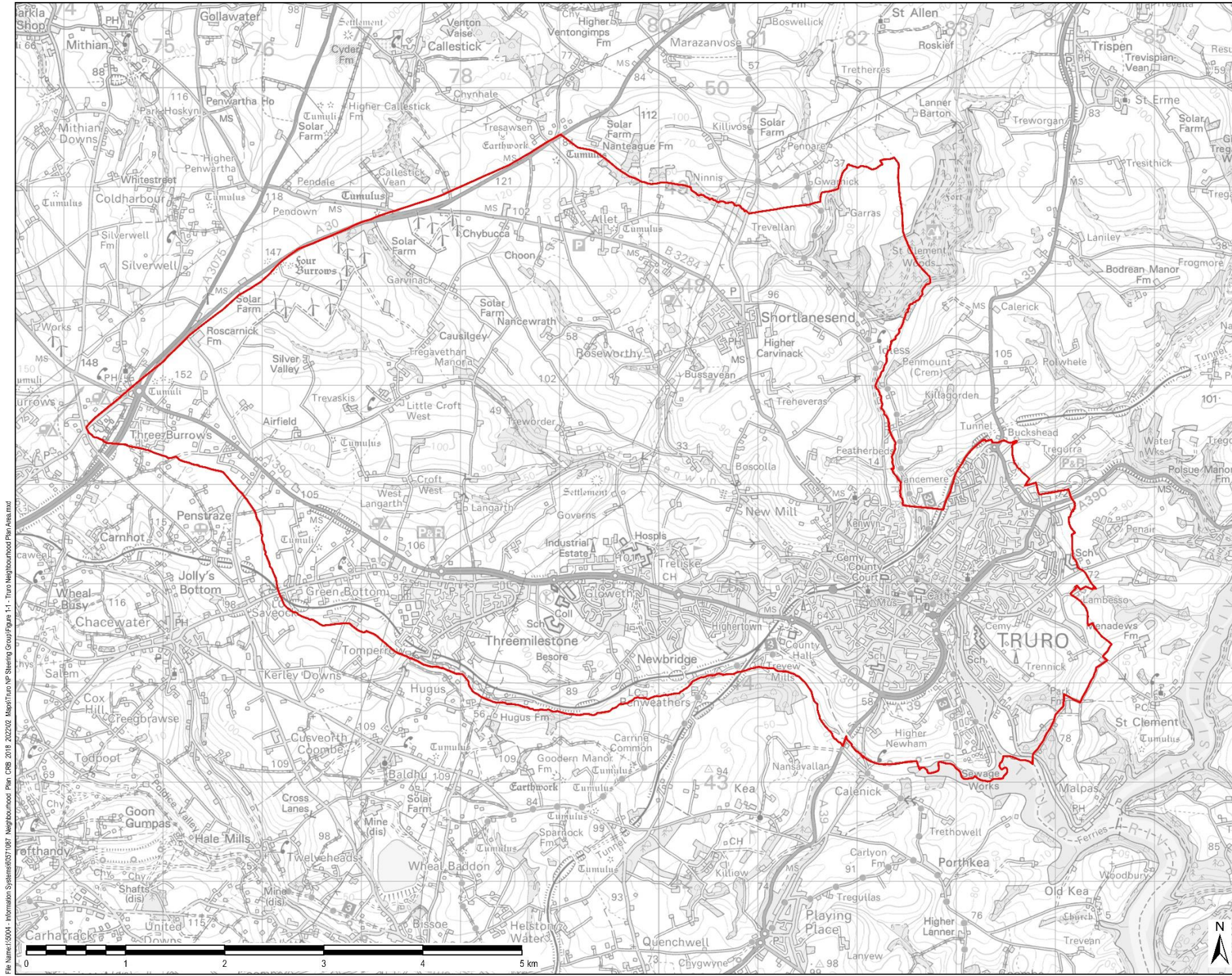
Likewise, the Neighbourhood Plan will also initiate several beneficial approaches for the 'Land, Soil and Water Resources' SA theme through the implementation of objectives which seek to limit pollution and improve the environmental quality of Truro and Kenwyn, and through (with the exception of Langarth) promoting a 'brownfield first' approach for new development areas. However, the Langarth proposals will inevitably lead to significant effects on soils resources through facilitating growth which leads to the permanent loss of productive agricultural land.

Next steps

This SA Report accompanies the Neighbourhood Plan for submission to the Local Planning Authority, Cornwall Council, for subsequent Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Cornwall Local Plan.

If Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by Cornwall Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Truro and Kenwyn Neighbourhood Plan will become part of the development plan for the two parishes.



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LEGEND

- Truro and Kenwyn
- Neighbourhood Plan Area

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Purpose of Issue

FINAL

Client

TRURO AND KENWYN NEIGHBOURHOOD PLAN STEERING GROUP

Project Title

SUSTAINABILITY APPRAISAL FOR THE TRURO AND KENWYN NEIGHBOURHOOD PLAN

Drawing Title

TRURO AND KENWYN NEIGHBOURHOOD PLAN AREA

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FIGURE 1.1

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1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Sustainability Appraisal (incorporating Strategic Environmental Assessment) in support of Truro and Kenwyn's Neighbourhood Plan (which encompasses the two parish areas of Truro and Kenwyn). The Neighbourhood Plan is a revision of the adopted Neighbourhood Plan which was 'made' in 2016, following a successful referendum. The 'made' Neighbourhood Plan is being reviewed in order to align itself with the Cornwall Local Plan, which was formally adopted in November 2016.
- 1.2 The Truro and Kenwyn Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012.
- 1.3 This SA Report accompanies the submitted version of the Neighbourhood Plan for independent examination. It is anticipated that the Neighbourhood Plan will undergo referendum in 2022.
- 1.4 Key information relating to the Truro Neighbourhood Plan is presented in **Table 1.1**.

Table 1.1: Key facts relating to the Truro and Kenwyn Neighbourhood Plan

Name of Responsible Authority	Truro City Council and Kenwyn Parish Council
Title of Plan	Truro and Kenwyn Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The 'made' Truro and Kenwyn Neighbourhood Plan is being revised and updated as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Cornwall Local Plan.</p> <p>The Truro and Kenwyn Neighbourhood Plan will be used to guide and shape development within the Neighbourhood Plan area.</p>
Timescale	To 2030
Area covered by the plan	The Truro and Kenwyn Neighbourhood Plan area covers the parish of Truro and the parish of Kenwyn in Cornwall (Figure 1.1).
Summary of content	The Truro and Kenwyn Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	Roger Gazzard, Town Clerk, Truro City Council Email address: roger@truro.gov.uk

SA explained

- 1.5 Sustainability appraisal (SA) is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the SA for the Truro and Kenwyn Neighbourhood Plan seeks to maximise the developing plan's contribution to sustainable development.
- 1.6 SA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive². It also widens the scope of the assessment from focussing on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Plans; however, a Neighbourhood Plan is not a Local Plan and SA is not therefore legally required.
- 1.7 The Truro and Kenwyn Neighbourhood Plan has been screened in by Cornwall Council as requiring a Strategic Environmental Assessment (SEA). To meet this requirement, the Neighbourhood Plan is undergoing an SA process which incorporates the requirements of the SEA Regulations. This mirrors the approach undertaken for the Cornwall Local Plan and enables the Neighbourhood Plan development process to consider how it will contribute to the achievement of sustainable development.
- 1.8 The SA has been undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 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
 - A report (the 'Environmental Report') is published for consultation alongside the Draft Plan (i.e. the draft Truro and Kenwyn Neighbourhood Plan) that presents outcomes from the SA (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.10 This SA Report updates the SA Report which accompanied the pre-submission version of the Neighbourhood Plan for Regulation 14 consultation (which addressed the requirements of 2) above). Chapter 3 discusses the scope of the SA process.

Structure of this SA Report

- 1.11 This document is the SA Report for the Truro and Kenwyn Neighbourhood Plan and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations.
- 1.12 Each of the four questions is answered in turn within this report, as follows:

² Directive 2001/42/EC

Table 1.2: Questions that must be answered by the SA Report in order to meet regulatory³ requirements

SA Report question		In line with the SEA Regulations, the report must include...⁴
What's the scope of the SA?	What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What is the sustainability 'context'?	<ul style="list-style-type: none"> 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
	What is the sustainability 'baseline'?	<ul style="list-style-type: none"> 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 & objectives?	<ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
What has plan-making/SA involved up to this point?		<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) 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 draft plan.
What are the assessment findings at this stage?		<ul style="list-style-type: none"> The likely significant effects associated with the submission version of the plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the submission version of the plan
What happens next?		<ul style="list-style-type: none"> The next steps for plan making/SA process.

³ Environmental Assessment of Plans and Programmes Regulations 2004

⁴ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

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

Local Plan context for the Neighbourhood Plan

- 2.1 The Cornwall Local Plan sets out Cornwall Council's main planning approach and policies for the county in the period to 2030. The overarching document for the Cornwall Local Plan is the *Cornwall Local Plan: Strategic Policies 2010-2030*, which was adopted in November 2016. This framework guides development in Cornwall, including through setting out the long-term plans of how housing and employment need will be met in Cornwall up to 2030.
- 2.2 Further details are provided by the *Site Allocations Development Plan Document*, which was adopted in November 2019, and identifies where new housing and employment uses will be delivered for ten towns/conurbations and two eco-communities in Cornwall.⁵ Neighbourhood Plans and Supplementary Planning Documents will also comprise part of the statutory development plan.
- 2.3 The Local Plan is intended to help deliver the vision and objectives of 'Future Cornwall', Cornwall Council's sustainable community strategy. The underlying principles of the strategy seek to manage future development to ensure all communities in Cornwall have an appropriate balance of jobs, services, facilities and homes.
- 2.4 Alongside, and supporting the Local Plan, Community Network Areas (CNAs) have been established to act as a local focus for debate and engagement. CNAs, which cover 16 broad areas in Cornwall, provide the basis for the place-based element of Local Plan's policy framework. Truro and Kenwyn are located within the Truro and Roseland CNA.

Cornwall Local Plan: Strategic Policies

- 2.5 The overarching document for the Cornwall Local Plan, the *Cornwall Local Plan: Strategic Policies 2010-2030*⁶ was adopted in November 2016. This sets out the land use policies to meet Cornwall's economic, environmental and social needs and aims for the future, and provides the framework for all subsequent documents prepared which form part of the Local Plan. The *Strategic Policies* incorporates a housing target of 5,100 dwellings in the wider Truro and Roseland CNA between 2010 and 2030, and 3,900 dwellings within Truro itself. At least 25,750 sq. m of B1a and B1b office floorspace and 21,667 sq. m of other B employment floorspace should also be delivered in the CNA during the plan period.
- 2.6 A key aim set out in the *Strategic Policies* is to support Truro's wider role as an economic and service centre and maintaining its role in the retail hierarchy and as a retail alternative to major centres outside of Cornwall.

⁵ The Site Allocations DPD does not propose allocations in St Newlyn East Parish.

⁶ Cornwall Council (2016): 'Cornwall Local Plan Strategic Policies 2010-2030', [online] available to download via: <<https://www.cornwall.gov.uk/localplancornwall>> last accessed [16/12/19]

Site Allocations DPD

- 2.7 Cornwall Council has prepared a *Site Allocations Development Plan Document (DPD)*⁷ to support the delivery of objectives set out in the *Strategic Policies*. The purpose of the Site Allocations DPD is to allocate land for a range of uses to meet the growth targets for the main towns in Cornwall, relating to housing growth, commercial growth and enabling infrastructure. In addition, the Site Allocations DPD identifies strategically important employment sites that should be safeguarded, in line with Policy 5 of the Strategic Policies document.
- 2.8 Cornwall Council has committed to creating, or supporting the creation, of community-based strategies for its larger settlements, whether this is through the Allocations DPD and/or through Neighbourhood Plans. In this respect, Truro (with Threemilestone and Shortlanesend) has been identified in the Site Allocations DPD as a location where a Neighbourhood Plan will set out the strategic sites / policies to deliver the Local Plan housing and employment targets.

Provisions relating to the Truro and Roseland CNA

- 2.9 The *Strategic Policies* document is accompanied by a set of provisions for each CNA in Cornwall.⁸ The specific objectives to be addressed in planning for the Truro and Roseland CNA are set out as follows:
- Objective 1 – Housing Needs: Plan for the appropriate location and distribution of housing growth, taking into consideration the evidence gathering work undertaken for the Truro and Threemilestone Area Action Plan. Ensure that the housing needs of the community are met, with a particular emphasis on affordable housing.
 - Objective 2 – Housing and Jobs: Balance the provision of employment and housing to reduce commuting.
 - Objective 3 – Employment: Provide high quality, well paid employment in locations that reduce the need to travel.
 - Objective 4 – Sustainable Transport: Enable the use of more sustainable transport modes (for goods and people) and reduce congestion through the provision of additional transport infrastructure and ensuring sustainable transport is designed into new development.
 - Objective 5 – Shops and Services: Support the retail function of Truro in relation to other main towns in Cornwall and within the South West. Protect shops and access to services and facilities in rural areas.
 - Objective 6 – Community Facilities: Ensure that facilities, including health, leisure, education and sports facilities, are provided to support new development and address existing deficiencies.
 - Objective 7 – Design: Ensure that development is adaptable, sustainable and of a high quality design and layout.

⁷ Cornwall Council (2019): 'Cornwall Site Allocations Development Plan Document', [online] available to download via: <<https://www.cornwall.gov.uk/media/38344158/allocations-dpd-full-doc-web.pdf>> last accessed [16/12/19]

⁸ Cornwall Council (2016) Cornwall Local Plan Strategic Policies 2010 – 2030: Community Network Area Sections, [online] available to download via: <<https://www.cornwall.gov.uk/media/28188310/local-plan-cna-sections-pr2.pdf>> last accessed [16/12/19]

- Objective 8 – Landscape: Ensure that development respects the distinctive landscape settings of both Truro and the Highertown / Threemilestone area.
- Objective 9 – Sustainable Development: Provide a strategic framework to balance economic development, maritime industries, protection of the environment and access to the coast.
- Objective 10 – Reduce the risk of flooding: Ensure future development utilises sustainable drainage technology and seeks to improve connections to the natural floodplain to reduce the impact of surface water flooding and avoid additional flood risks to ensure that additional flood risks are avoided. The sequential approach to flooding will inform site choices in Truro city centre taking into account significant flood risk on some sites.

2.10 Further provisions relevant for the Truro and Kenwyn Neighbourhood Plan area include as follows:

- Truro is an important retail centre of strategic importance attracting a wide catchment from the surrounding rural towns and villages. Suitable land for larger retail development is in limited supply in the city centre; however, opportunities include the Council's former office campus at Pydar Street, the Moorfield car park and Garras Wharf.
- Threemilestone village centre provides an important role for residents and provides local services and shopping. There is considerable potential for the regeneration of the centre to provide additional facilities and services for residents and workers at local employment areas.
- As the main settlement with good employment and transport provision, Truro (including the Kenwyn area) will be required to accommodate the majority of the CNA's dwellings. Coordination will be needed amongst the remaining parishes within the CNA to ensure that housing needs are met.

Vision, aims and objectives for the Neighbourhood Plan

2.11 The vision for the Truro and Kenwyn Neighbourhood Plan captures the community's views and aspirations as expressed through the consultation process. It therefore forms the basis on which the neighbourhood objectives and proposed policies have been formulated.

2.12 The vision is as follows:

“

Our vision is for Truro & Kenwyn to be a successful and vibrant place, where everyone has the opportunity to thrive economically, culturally and socially; a safe place, aware of its history and confident of its future; that promotes and achieves learning, innovation, activity, health and sustainable development. Truro & Kenwyn will be a diverse community that provides for and values all of its people, ensuring that developments benefit communities.

Vision Statement for the Truro and Kenwyn Neighbourhood Plan

”

2.13 The vision is underpinned by a clear set of core objectives that seek to make a positive contribution to sustainable growth within the parish, economically, environmentally and socially.

2.14 The objectives are as follows:

- Truro and Kenwyn to be vibrant, healthy, safe and pleasant places that maximise opportunities for work, fulfilment and enjoyment and a good mix of facilities, services and open spaces;
- Protect and nurture our economy, help strengthen our city centre offer and mix of uses and encourage the right conditions for better paid jobs;
- Our settlements to blend carefully and accessibly into our rural surroundings, conserving and enhancing the landscape and green spaces of our area and creating networks of green infrastructure;
- The variety and quality of life in our communities to be good, to encourage community cohesion and try and make sure that people of all ages and backgrounds can find fulfilment, happiness and safety in their communities;
- For people living and working in or visiting our area to play a full and dynamic part in tomorrow's Cornwall - fostering the spirit of “onen hag oll” - one and all; and
- Most of all, to engage young people in our community so that it attracts them to make their lives here.

3. What is the scope of the SA?

SA Scoping Report

- 3.1 The SEA Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.⁹ These authorities were consulted on the scope of the Truro and Kenwyn Neighbourhood Plan SA for a period of five weeks, between October and November 2014.
- 3.2 The purpose of scoping was to outline the ‘scope’ of the SA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
 - Baseline data against which the Neighbourhood Plan can be assessed;
 - The key sustainability issues for the Neighbourhood Plan; and
 - An ‘SA Framework’ of objectives against which the Neighbourhood Plan can be assessed.
- 3.3 The information presented in this SA Report has reflected the comments received on the Scoping Report from the consultation bodies.

⁹ In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because ‘*by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme*’.

Key Sustainability Issues

3.4 Drawing on the review of the sustainability context and baseline, the SA Scoping Report was able to identify a range of sustainability problems / issues that should be a particular focus of SA, ensuring it remains focused. These issues were then translated into sustainability ‘objectives’. These SA objectives (**Table 3.1** below) provide a methodological framework for the appraisal of likely significant effects on the baseline, outlined in the ‘SA Framework’ section (**Table 3.2** overleaf)

Table 3.1: SA themes and key issues / objectives

SA Theme	Key Issues / Objectives
Air Quality	<ul style="list-style-type: none"> • Support improvements to air quality in Truro and Kenwyn
Biodiversity and Geodiversity	<ul style="list-style-type: none"> • Protect and enhance all biodiversity and geological features
Climate Change	<ul style="list-style-type: none"> • Promote climate change mitigation and adaptation in Truro and Kenwyn • Increase resilience to flooding
Landscape	<ul style="list-style-type: none"> • Protect and enhance the character and quality of landscapes and townscapes.
Historic Environment	<ul style="list-style-type: none"> • Protect, maintain and enhance Truro and Kenwyn’s cultural heritage resource, including its historic environment and archaeological assets.
Land, Soil and Water Resources	<ul style="list-style-type: none"> • Ensure the more efficient use of land. • Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste. • Use and manage water resources in a sustainable manner.
Population and Community	<ul style="list-style-type: none"> • Cater for existing and future residents’ needs as well as the needs of different groups in the community, and improve equality of access to local, high-quality community services and facilities. • Reduce poverty and deprivation and promote more inclusive and self-contained communities. • Improve educational attainment and skill levels in Truro & Kenwyn. • Support a strong and sustainable economy within the Truro and Kenwyn Neighbourhood Area. • Maintain and enhance the vitality and viability of Truro city centre in order to strengthen its role as a service and employment centre.
Health and Wellbeing	<ul style="list-style-type: none"> • Improve the health and well-being of Truro and Kenwyn residents.
Transportation	<ul style="list-style-type: none"> • Promote sustainable transport use and reduce the need to travel.

SA Framework

3.5 The SA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard ‘tests’. Each proposal within the Neighbourhood Plan will be assessed consistently using the framework.

Table 3.2: SA Framework

SA Objective	Assessment questions
Air Quality	
Support improvements to air quality in Truro and Kenwyn	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Limit levels of air pollutants and odour? • Help alleviate air quality issues within the AQMA?
Biodiversity and Geodiversity	
Protect and enhance all biodiversity and geological features	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Protect and enhance the integrity of the two SACs and three SSSIs present in the plan area? • Protect and enhance semi-natural habitats? • Protect and enhance priority habitats, and the habitat of priority species? • Achieve a net gain in biodiversity? • Enhance biodiversity in County Wildlife Sites? • Prevent harm to geological sites and features of conservation interests? • Support access to, interpretation and understanding of biodiversity and geodiversity?

Climate change	
Promote climate change mitigation and adaptation in Truro and Kenwyn	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Limit the increase in the carbon footprint of the plan area from population growth? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Reduce the need to travel? • Increase number of new developments meeting sustainable design criteria? • Improve green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources? • Sustainably manage water run-off, ensure that the risk of flooding is not increased (either within the plan area or downstream) and where possible reduce flood risk? • Ensure the potential risks associated with climate change are considered through new development in the plan area? • Ensure that no development takes place in areas at higher risk of flooding, taking into the likely effects of climate change into account? • Increase the resilience of biodiversity in the plan area to the effects of climate change?
Increase resilience to flooding	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Sustainably manage water run-off, ensuring that the risk of flooding is not increased (either within the plan area or downstream) and where possible reduce flood risk? • Ensure that no development takes place in areas at higher risk of flooding, taking into account the likely effects of climate change?
Landscape	
Protect and enhance the character and quality of landscapes and townscapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the integrity of the Cornwall and Devon Mining Landscape World Heritage Site? • Support the integrity of the Cornwall AONB? • Protect and enhance landscape and townscape features? • Protect the intrinsic character and beauty of the countryside?

Historic Environment

Protect, maintain and enhance Truro and Kenwyn's cultural heritage resource, including its historic environment and archaeological assets.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Preserve and enhance the setting of cultural heritage assets? • Support the integrity of the Truro Conservation Area? • Preserve and enhance buildings and structures of architectural or historic interest? • Protect the historic settlement pattern of the city and villages in the plan area? • Conserve and enhance local diversity and distinctiveness? • Support access to, interpretation and understanding of the historic environment?
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Land, Soil and Water Resources

Ensure the more efficient use of land.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote the use of previously developed land? • Avoid the development of the best and most versatile agricultural land, in particular Grade 2 and Grade 3a agricultural land, with a preference for lower quality agricultural land?
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the amount of waste produced? • Move waste up the waste hierarchy? • Maximise opportunities for local management of waste in order to minimise export of waste? • Encourage recycling of materials and minimise consumption of resources during construction?
Use and manage water resources in a sustainable manner.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support improvements to water quality? • Minimise water consumption?

Population and Community

Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve equality of access to local, high-quality community services and facilities.	<p>Will the option/proposal help to...</p> <ul style="list-style-type: none"> • Tackle the causes of poverty and deprivation? • Encourage and promote social cohesion? • Maximise opportunities within the most deprived areas? • Increase the ability of 'hard-to-reach' groups to influence decisions? • Minimise fuel poverty? • Maintain or enhance the quality of life of existing local residents? • Promote the development of a range of high quality, accessible community, cultural and leisure facilities? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Encourage active involvement of local people in community activities?
Reduce poverty and deprivation and promote more inclusive and self-contained communities.	

Improve educational attainment and skill levels in Truro & Kenwyn.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Provide and support high quality educational facilities? • Improve the skills and qualifications of young people? • Help to provide a supply of skilled labour to match the needs of local businesses?
Support a strong and sustainable economy within the Truro and Kenwyn Neighbourhood Area.	<p>Will the option/proposal help to...</p> <ul style="list-style-type: none"> • Provide an appropriate amount of employment land in the plan area and ensure that suitable sites are available? • Retain existing employment sites which make a significant contribution to the overall employment offer, to ensure that the overall quantum for employment is increased? • Support the economy of the plan area and provide a range of employment opportunities accessible to where people live? • Ensure skills provision meets business requirements, so a greater proportion of the local population can share the benefits of economic success? • Increase the economic impact and value of tourism?
Maintain and enhance the vitality and viability of Truro city centre in order to strengthen its role as a service and employment centre.	<p>Will the option/proposal help to...</p> <ul style="list-style-type: none"> • Continue to maintain the vitality and viability of the retail offer in Truro, and strengthen its service centre role? • Create an attractive city centre environment, which appeals to visitors and shoppers alike?

Health and Wellbeing

Improve the health and well-being of Truro and Kenwyn residents.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Encourage healthy lifestyles and reduce health inequalities? • Provide and enhance the provision of community access to green infrastructure, in accordance with national standards? • Provide high quality open spaces and opportunities for sport and recreation, to support the health and well-being of communities? • Improve access to the countryside for recreation?
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Transportation

Promote sustainable transport use and reduce the need to travel.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the need to travel through sustainable patterns of land use and development? • Encourage modal shift to more sustainable forms of travel? • Enable transport infrastructure improvements? • Support improvements to green infrastructure networks?
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4. What has plan making / SA involved up to this point?

Introduction

- 4.1 The ‘narrative’ of plan-making / SA up to this point is told within this part of the SA Report.
- 4.2 A key element of the SA process is the appraisal of ‘reasonable alternatives’ for the Truro and Kenwyn Neighbourhood Plan. The SEA Regulations¹⁰ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the ‘*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*’.
- 4.3 In accordance with the SEA Regulations the Environmental Report (or SA 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.
- 4.4 The following sections therefore describe how the SA process to date has informed the preferred development strategy for the Neighbourhood Plan area and potential locations for development. Specifically, this chapter explains how the Neighbourhood Plan’s development strategy has been shaped through considering alternative approaches for the location of growth in the Neighbourhood Plan area.

Overview of plan making / SA work undertaken since 2011

- 4.5 In 2011, Truro City and Kenwyn Parish Councils decided to start preparing a draft Neighbourhood Plan. Following a referendum held on the 10th November 2016 the plan was ‘made’. It is now part of the development plan for the area and it must be used by planners in the period up to 2030 when considering any developments in the Truro and Kenwyn area.
- 4.6 However, since 2016, a number of factors have become more prominent which suggests a refresh of the Neighbourhood Plan would be appropriate. This includes: opportunities to help re-plan major new developments in the Neighbourhood Plan area, including at Langarth and Pydar Street; the declaration of the climate emergency in Cornwall in early 2019; a need to make improvements to health and wellbeing; and the creation of a greener city and encouraging more sustainable ways to travel.

¹⁰ Environmental Assessment of Plans and Programmes Regulations 2004

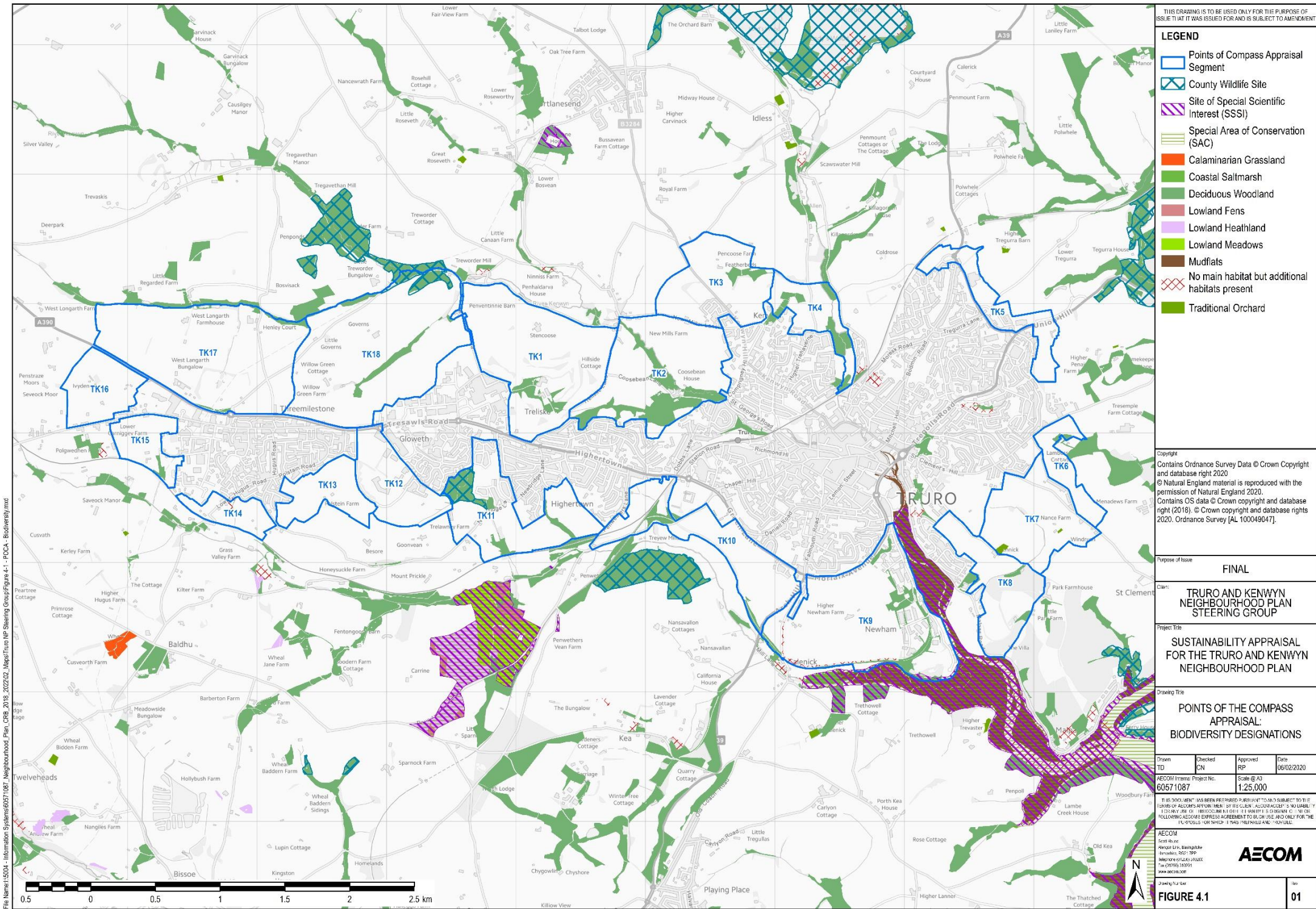
Growth to deliver through the Neighbourhood Plan

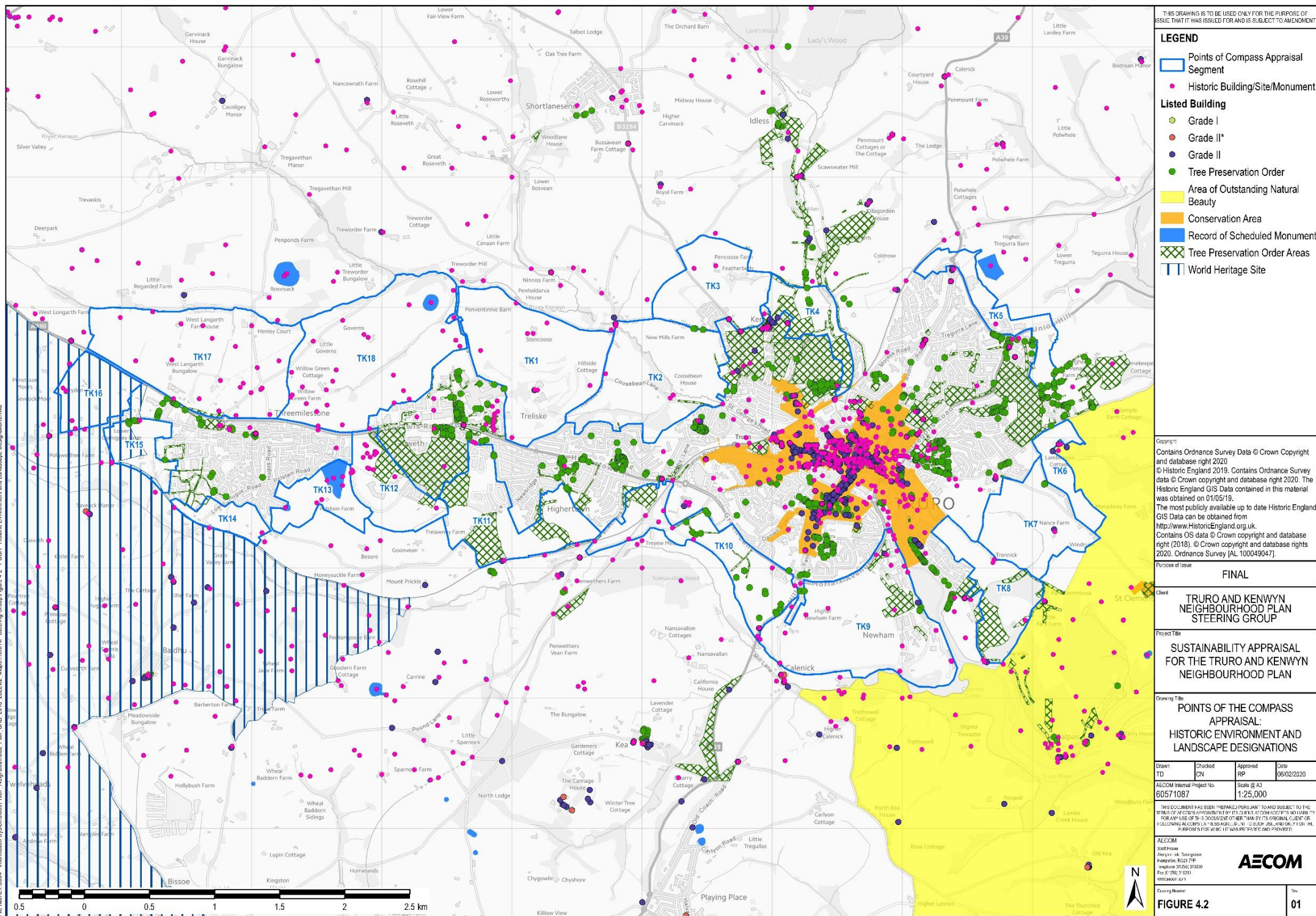
- 4.7 As discussed in Chapter 2, the overarching document for the Cornwall Local Plan, the *Cornwall Local Plan: Strategic Policies 2010-2030*¹¹ was adopted in November 2016. This sets out the land use policies to meet Cornwall's economic, environmental and social needs and aims for the future, and provides the framework for all subsequent documents prepared which form part of the Local Plan.
- 4.8 The *Strategic Policies* incorporates a housing target of 5,100 dwellings in the wider Truro and Roseland CNA between 2010 and 2030, and 3,900 dwellings within Truro itself. At least 25,750 sq. m of B1a and B1b office floorspace and 21,667 sq. m of other B employment floorspace should also be delivered in the CNA during the plan period.
- 4.9 Cornwall Council has committed to creating, or supporting the creation, of community-based strategies for its larger settlements, whether this is through the Allocations DPD and/or through Neighbourhood Plans. In this respect, Truro (with Threemilestone and Shortlanesend) have been identified in the Site Allocations DPD as a location where a Neighbourhood Plan will set out the strategic sites / policies to deliver the Local Plan housing and employment targets.
- 4.10 Since 2010, permissions have been granted for around 4,100 dwellings in Truro and Kenwyn. As such the Local Plan housing target has already been met. Similarly, in terms of employment provision, a large proportion of the Local Plan's employment land provision has also already been delivered through permissions.
- 4.11 Whilst there is not a need for the Neighbourhood Plan to allocate additional sites, a key aim of the Neighbourhood Plan is to support the economic vitality of Truro and support growth which meets the diverse community needs of residents. In light of this, the intention of the Neighbourhood Plan is to provide policies for significant development at major areas of growth (including those with planning permissions), and to provide additional guidance on development quality and how development can help create more sustainable and efficient places to live.
- 4.12 To reflect this, the SA process has sought to inform the Neighbourhood Plan's decision-making process through considering the relative merits of taking forward growth at different locations around Truro and Threemilestone. The purpose of this appraisal is to inform the choices made through the Neighbourhood Plan relating to the type, layout and design of development to be taken forward in Truro and Kenwyn, including in association with major areas of growth.

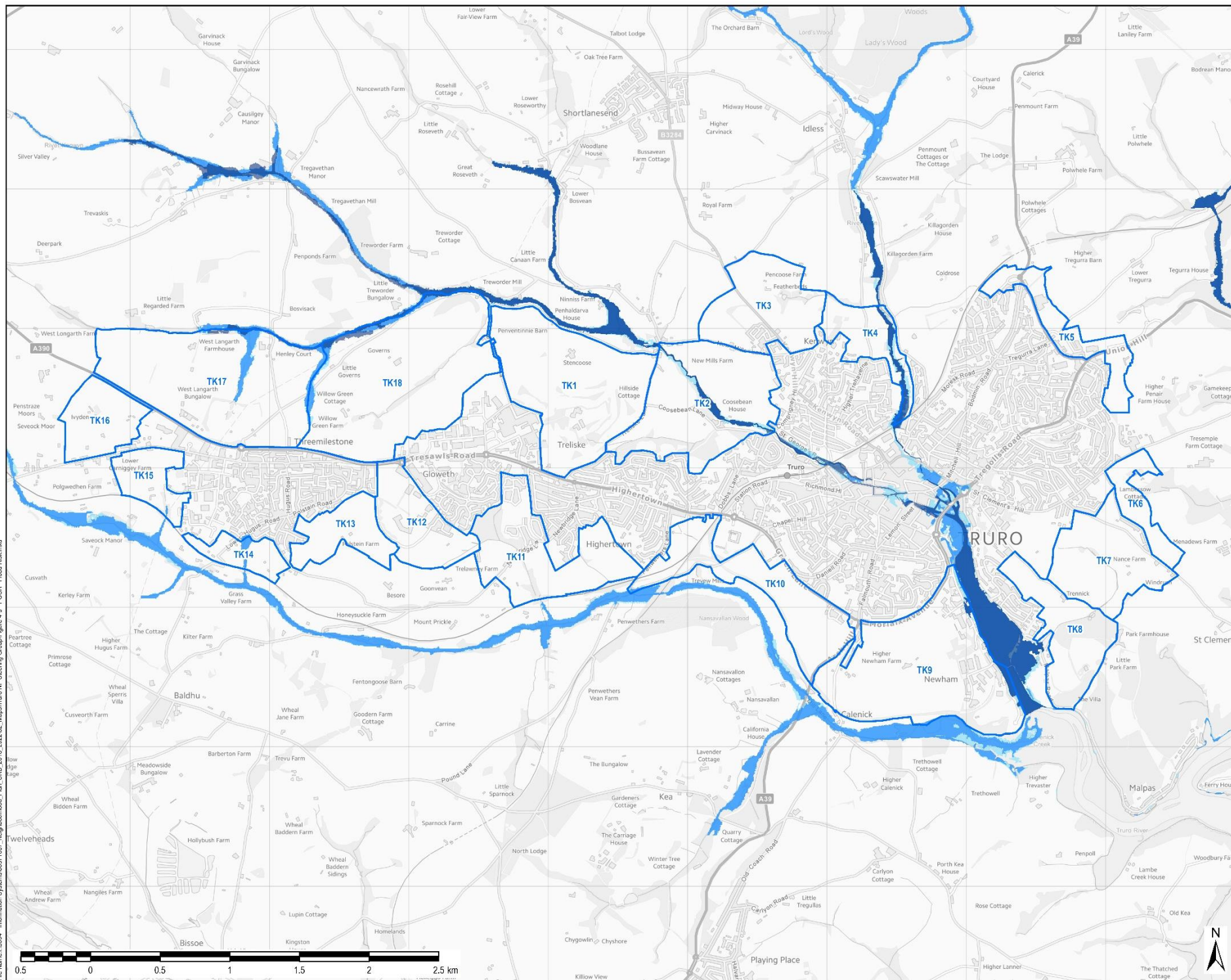
¹¹ Cornwall Council (2016): 'Cornwall Local Plan Strategic Policies 2010-2030', [online] available to download via: <<https://www.cornwall.gov.uk/localplancornwall>> last accessed [16/12/19]





Assessment of reasonable alternatives for broad areas of growth surrounding Truro and Threemilestone

- 4.13 To facilitate consideration of the relative merits of potential locations for growth in the Neighbourhood Plan, 18 broad areas, or 'segments', were mapped around surrounding the existing built up area of the settlements of Truro and Threemilestone. Broadly representing the 'points of the compass', the 18 segments have been evaluated, with a view to establishing the key constraints to development in each of these areas.
- 4.14 The key environmental constraints present in each of the segments, include those relating to: biodiversity; historic environment; landscape character and sensitivity; agricultural land quality; flood risk; and the water environment, have been evaluated. In this context, the segments are mapped overleaf in **Figures 4.1 to 4.4** in association with key constraints. **Table 4.1** (overleaf) subsequently presents the findings of the 'points of the compass' appraisal of the segments.
- 4.15 This appraisal seeks to provide an overview of the relative merits of taking forward development in each of the locations considered. It has been undertaken by AECOM as an independent and objective desk-based assessment, with reference to the following principal sources of information: Magic Interactive Map; Cornwall Council's Interactive Online Mapping Tool; GIS Layers (provided by the Neighbourhood Planning Steering Group); Natural England Regional Agricultural Land Classification Mapping and UK Government Flood Maps for Planning.







THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT			
LEGEND			
	Points of Compass Appraisal Segment		
	Flood Zone 2		
	Flood Zone 3a		
	Flood Zone 3b - Functional Flood Plain		
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Purpose of Issue FINAL			
Client TRURO AND KENWYN NEIGHBOURHOOD PLAN STEERING GROUP			
Project Title SUSTAINABILITY APPRAISAL FOR THE TRURO AND KENWYN NEIGHBOURHOOD PLAN			
Drawing Title POINTS OF THE COMPASS APPRAISAL: FLOOD RISK ZONES			
Drawn TD	Checked CN	Approved RP	Date 06/02/2020
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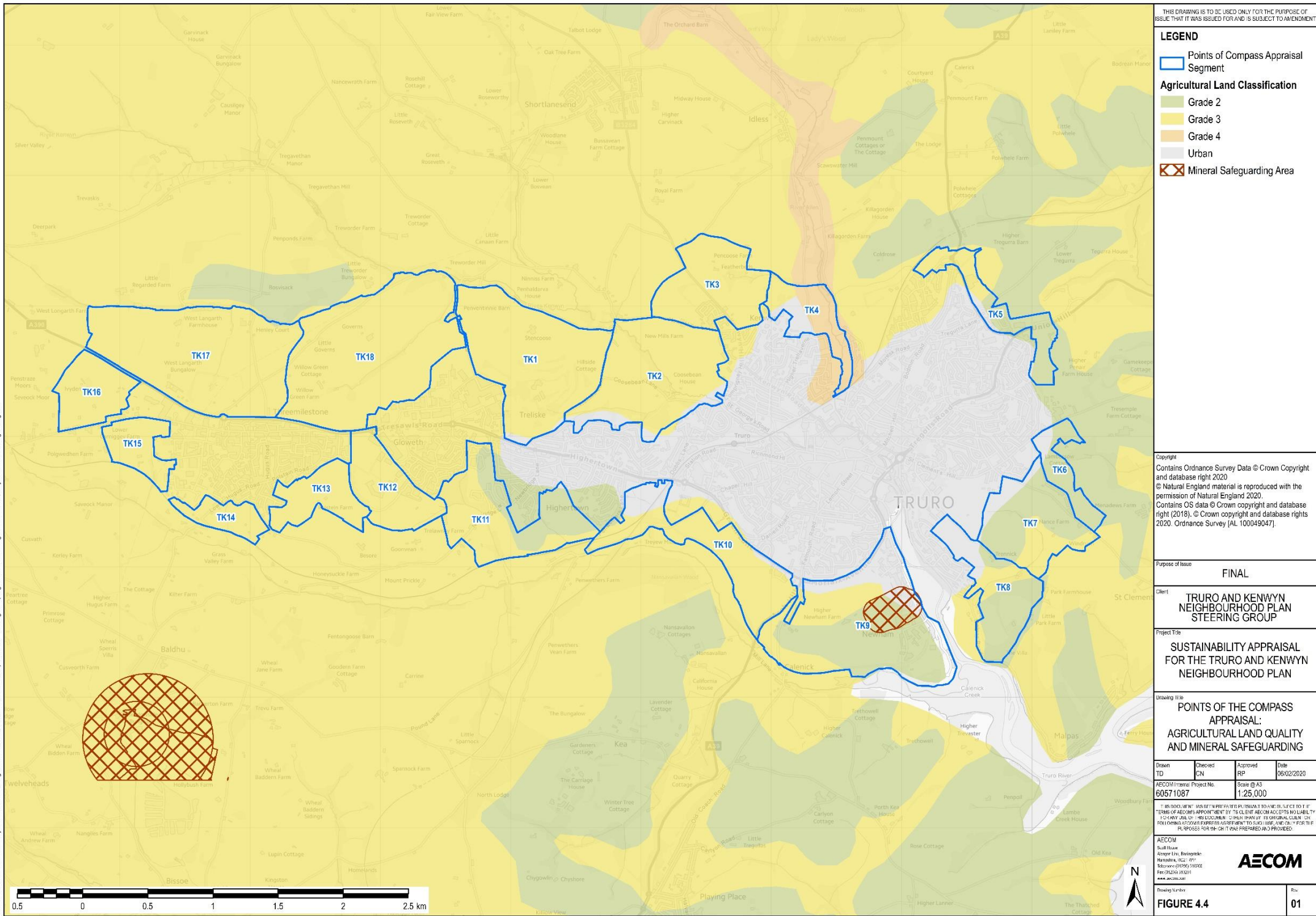


Table 4.1: Findings of the points of the compass appraisal

PoCA Segment	Key Constraints	SA Themes for which key constraints exist
TK1	<p>TK1 is within an SSSI Impact Risk Zone (IRZ) for “Residential development of 100 units or more”, associated with the Malpas Estuary SSSI. Areas of deciduous woodland BAP Priority Habitat are located in the segment, associated with Truro Preparatory School and Truro Golf Club.</p> <p>The Grade II listed Treliske School is located in the southern central part of TK1. At the same location are two features listed on the Historic Environment Record, ‘Treliske Medieval settlement’ and ‘Post Medieval house, Modern school’. In the eastern part of the segment a feature listed on the HER as ‘Iron Age round, Romano British round’ is present. Two features listed on the HER are present in the vicinity of Stencoose Farm, including a prehistoric round and a medieval settlement, and a further feature listed on the HER is present c.75 north east of the farm, namely: ‘Medieval field boundary, Post Medieval field boundary’. In the west of the segment, a further feature listed as ‘Penventinnie - Prehistoric/medieval enclosure’ is also present.</p> <p>The segment is within the Truro AQMA.</p> <p>Based on the Post 1988 Agricultural Land Classification, TK1 includes a patch of Grade 3a Agricultural Land (Best and Most Versatile). However, the segment predominantly consists of Grade 3b, Grade 4 and ‘Other’ Agricultural Land (not the Best and Most Versatile for agricultural purposes).</p> <p>There are small areas within the segment which are at low risk from surface water flooding, predominantly located around River Kenwyn and its tributaries.</p> <p>There are two Tree Preservation Orders on the western boundary of the segment.</p>	Air Quality, Biodiversity, Historic Environment, Land, Soil and Water Resources
TK2	<p>The eastern parts of the segment are within an SSSI IRZ for “Residential development of 25 units or more”, associated with the Malpas Estuary SSSI. Extensive areas of deciduous woodland BAP Priority Habitat are located in TK2, covering much of the southern part of the segment. A corridor of this habitat also extends from the centre of the segment to the north west.</p> <p>Four features listed on the Cornwall HER are present in TK2. This includes a ‘Post Medieval stamping mill’ located close to Hillside Cottage and two features at Coosebean, ‘Coosebean Mill - Post Medieval blowing house’ and Coosebean- Medieval settlement. The course of an 18th Century leat which runs through the segment parallel to the River Kenwyn is also listed on the HER.</p> <p>Based on the Post 1988 Agricultural Land Classification, TK2 contains a patch of Grade 3a Agricultural Land to the north of the segment (Best and Most Versatile). Towards the middle of the segment there is a patch of Grade 3b Agricultural Land, and to the south there is a patch of Grade 4 Agricultural Land (not the Best and Most Versatile for agricultural purposes).</p> <p>A narrow band of fluvial Flood Zone 2 and 3 and medium to high risk flooding from surface water crosses the centre of the segment from a north west to south east direction. This is associated with the River Kenwyn.</p> <p>A number of Tree Preservation Orders are located on the northern and eastern boundary.</p> <p>The segment is within the Truro AQMA.</p>	Air Quality, Biodiversity, Climate Change, Historic Environment, Land, Soil and Water Resources

PoCA Segment	Key Constraints	SA Themes for which key constraints exist
TK3	<p>The southern parts of the segment are within an SSSI IRZ for “Residential development of 25 units or more”, associated with the Malpas Estuary SSSI. A small corridor of deciduous woodland BAP Priority Habitat extends along a corridor in the east of the segment to Featherstone Cottage.</p> <p>Two features listed on the Cornwall HER are present in TK3. This includes the Pencoose medieval settlement and Iron Age round, Romano British round west of Pencoose Farm. The south eastern part of the segment is within the setting of Kenwyn, which is an area rich in historic environment assets. This includes potentially features associated with the Grade II* listed Church of St Keyne, which is located to the south east.</p> <p>Based on the Post 1988 Agricultural Land Classification, TK3 includes a patch of Grade 3a Agricultural Land (Best and Most Versatile). However, the segment also consists of Grade 3b, Grade 4 and ‘Other’ Agricultural Land (not the Best and Most Versatile for agricultural purposes).</p> <p>There is a small strip of medium to high surface water flooding within the east of the segment which is located around a tributary of River Allen.</p> <p>Three Tree Preservation Orders are located on the southern boundary and the segment is also adjacent to a Tree Preservation Order Area on the southern boundary.</p> <p>The southwestern part of the segment is within the Truro AQMA.</p>	Air Quality, Biodiversity, Historic Environment, Land, Soil and Water Resources
TK4	<p>TK4 is within an SSSI IRZ for “Residential development of 25 units or more”, associated with the Malpas Estuary SSSI. Four areas of deciduous woodland BAP Priority Habitat are located in the segment, covering approximately 25%-30% of the segment. Much of this is located on the River Allen corridor, which is an important component of local ecological networks.</p> <p>The south western part of the segment is within the setting of Kenwyn, which is an area rich in historic environment assets. This includes potential features associated with the Grade II* listed Church of St Keyne and the Grade II listed Epiphany House, Kenwyn Church Road, which are located to the south west. The southern edge of the segment adjoins the Truro Conservation Area.</p> <p>Based on the Post 1988 Agricultural Land Classification, TK4 includes a patch of Grade 2 Agricultural Land (Best and Most Versatile). However, the segment largely consists of Grade 3b, Grade 4 and ‘Other’ Agricultural Land (not the Best and Most Versatile for agricultural purposes).</p> <p>A corridor of land within fluvial Flood Zone 2 and 3, associated with the River Allen, passes through the eastern part of the segment. This area also has a medium to high risk of surface water flooding.</p> <p>A number of Tree Preservation Orders are located along the River Allen corridor.</p> <p>The north eastern corner of the segment is adjacent to St Clement Area of Great Landscape Value.</p> <p>Part of the southern section of the segment is within the Truro AQMA.</p>	Air Quality, Biodiversity, Climate Change, Historic Environment, Landscape, Land, Soil and Water Resources

PoCA Segment	Key Constraints	SA Themes for which key constraints exist
TK5	<p>TK5 is within an SSSI IRZ for “Residential development of 25 units or more”, associated with the Malpas Estuary SSSI.</p> <p>The segment is located within the setting of the following scheduled monument: ‘Polwhele Castle: a round with hut circle and field system 160m south west of Higher Tregurra’. Located approximately 50m to the north east, the scheduled monument includes a round of the later prehistoric to Roman period known as Polwhele Castle, with a hut circle and the known extent of an associated field system situated on a slight east slope near the top of a hill north of Truro. Within the scheduling are settlement-related features including a possible kiln.</p> <p>A feature listed on the HER as ‘Tregurra - C20 show ring’ is located adjacent to Stret Tempel.</p> <p>Based on the Post 1988 Agricultural Land Classification, TK5 includes patches of Grade 3a Agricultural Land (Best and Most Versatile). The segment also includes smaller patches of Grade 3b, Grade 4 and ‘Other’ Agricultural Land (not the Best and Most Versatile for agricultural purposes).</p> <p>There is a large cluster of Tree Preservation Orders located towards the south of the segment.</p> <p>TK5 is located within St Clement Area of Great Landscape Value.</p> <p>Most of the segment is within the Truro AQMA.</p>	<p>Air Quality, Biodiversity, Historic Environment, Landscape, Land, Soil and Water Resources</p>
TK6	<p>TK6 is within an SSSI IRZ for “Residential development of 25 units or more”, associated with the Malpas Estuary SSSI. A very limited area of deciduous woodland BAP Priority Habitat is present on the north eastern boundary of the segment.</p> <p>The northern part of the segment is located adjacent to the Grade II listed ‘Lambessow Manor and Lembessow’, and the Grade II listed ‘Gate Piers approx 75 Metres to South-West of Lambessow Manor’ is also located within this part of the segment. There are a number of features listed on the HER in this location, including the site of an ‘Early Medieval settlement at Lambessow’ and an ‘Early Medieval lann’.</p> <p>Based on the Post 1988 Agricultural Land Classification, TK6 includes patches of Grade 2 and 3a Agricultural Land (Best and Most Versatile). The segment also includes smaller patches of Grade 3b, Grade 4 and ‘Other’ Agricultural Land (not the Best and Most Versatile for agricultural purposes).</p> <p>There are small areas of land located around the tributaries of Tresillian River which are at low risk of flooding from surface water. The segment is not within Flood Zone 2 or 3.</p> <p>The eastern part of the segment is located within the South Coast Central section of Cornwall AONB. The north eastern corner of the segment is also adjacent to the St Clement Area of Great Landscape Value.</p> <p>The western edge of the segment is within the Truro AQMA.</p>	<p>Air Quality, Biodiversity, Historic Environment, Landscape, Land, Soil and Water Resources</p>

PoCA Segment	Key Constraints	SA Themes for which key constraints exist
TK7	<p>TK7 is within an SSSI IRZ for “Residential development of 25 units or more”, associated with the Malpas Estuary SSSI. A very limited area of deciduous woodland BAP Priority Habitat is present on the south western boundary of the segment.</p> <p>The Grade II listed Nance Farmhouse is located in the centre-east of the segment. A further feature listed on the Cornwall HER (‘Nance Farm - Medieval settlement’) is located next to the farm. The site is also in the setting of the features listed on the HER located within TK8 (and discussed below).</p> <p>Based on the Post 1988 Agricultural Land Classification, TK7 includes patches of Grade 2 and 3a Agricultural Land (Best and Most Versatile). However, the segment also includes patches of Grade 3b, Grade 4 and ‘Other’ Agricultural Land (not the Best and Most Versatile for agricultural purposes).</p> <p>There is a small area which is at low risk of flooding from surface water located in the centre of the segment.</p> <p>There is one Tree Preservation Order located towards the north of the segment.</p> <p>TK7 is adjacent to the South Coast Central section of Cornwall AONB, which is located on the eastern boundary.</p> <p>Part of the north eastern section of the segment is within the Truro AQMA.</p>	<p>Air Quality, Biodiversity, Historic Environment, Landscape, Land, Soil and Water Resources</p>
TK8	<p>The southern part of TK8 is within SSSI IRZs for “Any residential developments outside of existing settlements/urban areas with a total net gain in residential units” and “All planning applications (except householder)”, associated with the Malpas Estuary SSSI. This is given it adjoins to the south west the Malpas Estuary SSSI, which is also internationally designated as part of the Fal & Helford Special Area of Conservation. Very small areas of deciduous woodland BAP Priority Habitat are present in the centre of the segment and on its southern boundary.</p> <p>The north western boundary of the segment adjoins the Truro Conservation Area. Two features listed on the Cornwall HER are located on Trennick Lane, including the site of a C19th school and the Trennick early Medieval settlement. A Post Medieval house listed on the HER is also located on the south eastern boundary of the segment.</p> <p>Based on the Post 1988 Agricultural Land Classification, TK8 includes patches of Grade 3a Agricultural Land (Best and Most Versatile). However, the segment also includes patches of Grade 3b, Grade 4, Grade 5 and ‘Other’ Agricultural Land (not the Best and Most Versatile for agricultural purposes).</p> <p>There is an area which is at medium to high risk of flooding from surface water located in the centre of the segment.</p> <p>There are four Tree Preservation Order Areas located within the southern part of the segment.</p> <p>TK8 is adjacent to the South Coast Central section of Cornwall AONB, which is located on the eastern boundary.</p>	<p>Biodiversity, Historic Environment, Landscape, Land, Soil and Water Resources</p>

PoCA Segment	Key Constraints	SA Themes for which key constraints exist
TK9	<p>TK9 adjoins the Malpas Estuary SSSI, which is also internationally designated as part of the Fal & Helford Special Area of Conservation. As such an SSSI IRZ for “All planning applications (except householder) outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures” covers much of the segment. Areas of deciduous woodland BAP Priority Habitat are located in the east of TK9, including in the vicinity of Gas Hill and along the cycle route.</p> <p>TK9 has a rich historic environment. Two nationally listed buildings are present in the segment: the Grade II listed Newham House is located in the north of the segment within woodland just south of the A39, and the Grade II listed Newham Villa is located in the eastern part of the segment on Newham Road. A range of features are also listed on the Cornwall HER in TK9. This includes, in the built up part of the segment, the site of: the Newham Medieval settlement; a post Medieval smelting house; a post Medieval farm building; post Medieval quays; a post Medieval timber pond; a post Medieval railway bridge; a post Medieval gas holder; post Medieval quarries; and post Medieval lime kiln. Outside of the existing built up area of the segment, the HER lists: a Medieval field system; a Bronze Age barrow at Higher Newham; the site of one of three Royal Observer Corps Posts to be built for WW2 and the Cold War period - demolished in 1968; the Huthnance Medieval settlement; and the post Medieval route to Feock. The route of a C18 turnpike road also forms the western boundary of the segment.</p> <p>The eastern edge of the segment is within an area of tidal Flood Zone 2 and 3, associated with the Truro River. There are also small patches which are at high risk of flooding from surface water within the south and east of the segment.</p> <p>A Minerals Safeguarding Area covers the eastern central part of TK9. This is associated with Newham Quarry.</p> <p>Based on the Post 1988 Agricultural Land Classification, TK9 includes a large patch of Grade 3a Agricultural Land (Best and Most Versatile). However, the segment also includes patches of Grade 3b and Grade 4 Agricultural Land (not the Best and Most Versatile for agricultural purposes).</p> <p>There are four Tree Preservation Order Areas within the eastern part of the segment as well as two Tree Preservation Orders in the east of the segment and one Tree Preservation Order on the western boundary of the segment.</p> <p>TK9 is adjacent to the South Coast Central section of Cornwall AONB on the southern boundary.</p> <p>The segment is within the Truro AQMA.</p>	<p>Air Quality, Biodiversity, Climate Change, Historic Environment, Landscape, Land, Soil and Water Resources</p>

PoCA Segment	Key Constraints	SA Themes for which key constraints exist
TK10	<p>The eastern part of TK10 is within an SSSI IRZ for “Residential development of 25 units or more”, associated with the Malpas Estuary SSSI. An area of deciduous woodland BAP Priority Habitat associated with Penwithers Junction is present adjacent to County Hall. A further very limited area of deciduous woodland BAP Priority Habitat is present on the southern edge of the segment along the cycle route.</p> <p>A number of features listed on the Cornwall HER are present in the area. This includes the site of the Tolgariick Medieval settlement and the site of a post Medieval mint in the northeastern corner of the segment. Elsewhere in TK10 there are a range of features listed on the HER associated with the railway network, including a permanent way hut on the Newham branch of the former railway line, a railway embankment at Penwithers Junction, a railway bridge at Treyew Mills, a railway cutting at Highertown, the former station at Highertown and railway bridges at Penwithers and Penwethers Lane. The route of a C18 turnpike road also forms the eastern boundary of the segment, with a Grade II listed milestone located on this route. Parts of the north west of the segment may be within the setting of the Grade II listed New County Hall and associated features.</p> <p>Based on the Post 1988 Agricultural Land Classification, TK10 includes areas covered by of Grade 3a Agricultural Land (Best and Most Versatile). However, the segment also includes patches of Grade 3b, Grade 4, Grade 5 and ‘Other’ Agricultural Land (not the Best and Most Versatile for agricultural purposes).</p> <p>There are small patches which are at high risk of flooding from surface water located along the southern part of the segment.</p> <p>Multiple Tree Preservation Orders are located within the centre and south east of the segment as well as a Tree Preservation Order Area in the north west of the segment.</p> <p>The segment is within the Truro AQMA.</p>	Air Quality, Biodiversity, Historic Environment, Land, Soil and Water Resources
TK11	<p>Most of TK11 is within an SSSI IRZ for “Residential development of 100 units or more”, associated with the Carrine Common & Penwethers SSSI. The southern edge of the segment is within the SSSI’s IRZ for “Residential development of 50 units or more”. The Halbullock Moor County Wildlife Site covers the far western part of TK11. This area has also been categorised as an area of deciduous woodland BAP Priority Habitat. There are smaller areas of deciduous woodland BAP Priority Habitat located along the railway line.</p> <p>There are a number of features on the southern boundary of TK11 listed on the HER associated with the railway corridor. This includes the Penwethers Railway embankment, the railway bridge associated with Dudman Farm Road and the Penwithers Viaduct, which is also a nationally designated Grade II listed structure.</p> <p>Based on the Post 1988 Agricultural Land Classification, TK11 includes small patches of Grade 3a Agricultural Land (Best and Most Versatile). However, the segment also includes small patches of Grade 3b, Grade 4, Grade 5 and large patches of ‘Other’ Agricultural Land (not the Best and Most Versatile for agricultural purposes).</p> <p>There is a small strip of land which has a low to medium risk from surface water flooding located towards the east of the segment. This area of land links to a tributary that leads to Calenick Creek.</p> <p>There are three Tree Preservation Order Areas within the segment, as well as five Tree Preservation Orders bordering the northern boundary of the segment.</p> <p>The segment is within the Truro AQMA.</p>	Air Quality, Biodiversity, Historic Environment, Land, Soil and Water Resources

PoCA Segment	Key Constraints	SA Themes for which key constraints exist
TK12	<p>TK12 is within an SSSI IRZ for “Residential development of 100 units or more”, associated with the Carrine Common & Penwethers SSSI.</p> <p>A cluster of Iron Age huts, Iron Age enclosures and Iron Age boundaries are present on the playing fields in TK12, as well as three further Iron Age huts at Higher Besore Road. These comprise twelve huts forming a settlement which included animal enclosures and an associated field system, excavated in 2004 to the south of Mount Pleasant. A further site listed on the HER, a Medieval village, is located at Truro College.</p> <p>Based on the Post 1988 Agricultural Land Classification, TK12 includes a patch of Grade 3a Agricultural Land (Best and Most Versatile). A detailed Agricultural Land Classification has not been undertaken for the rest of TK12. As such there is a need to rely on the national ‘Provisional Agricultural Land Quality’ dataset. This shows that the segment consists of Grade 3 Agricultural Land. However, without the subset grading (3a or 3b) it is not possible to tell at this stage whether the agricultural land is considered to be ‘best and most versatile’.</p> <p>There is a small strip of medium to high risk from surface water flooding in the centre of the segment which links to a tributary that leads to Calenick Creek.</p> <p>There is one Tree Preservation Order Area located within the north of the segment.</p> <p>The segment is within the Truro AQMA.</p>	Air Quality, Biodiversity, Historic Environment, Land, Soil and Water Resources
TK13	<p>TK13 is within an SSSI IRZ for “Residential development of 100 units or more”, associated with the Carrine Common & Penwethers SSSI.</p> <p>A scheduled monument ‘Round and associated remains 150m south of Mount Pleasant’ covers much of the north eastern part of TK13. It dates from between the later Iron Age and the early post-Roman period. The monument includes a round, in the form of a roughly square defended enclosure with an outwork, and part of a contemporary field system to the south. These survive as a combination of slight earthworks and buried remains recorded over the years through aerial photography and geophysical prospection. The site of the round is on high ground facing south, 150m to the south of another round which no longer survives. It occupies a position above the shallow south-facing valley side of a small tributary of the River Kenwyn.</p> <p>A further scheduled monument ‘Round 180m north east of Polstein’ is located to the east of Rosevalley. The scheduling includes a later prehistoric to Romano-British round, situated on level ground on top of a ridge south of Threemilestone. The round is ovoid in plan, measuring up to 40m east-west by 34m north-south overall. The round has an enclosing bank of earth and stone, visible on the north west side where it is modified to form a modern stone-faced boundary bank.</p> <p>There are a number of further features associated with the rounds identified on the HER. Other features listed on the Cornwall HER include the site of the Polstein Medieval settlement and streamworks.</p> <p>Based on the Post 1988 Agricultural Land Classification, TK13 includes areas classified as Grade 3a Agricultural Land (Best and Most Versatile). However, the segment also includes small patches of ‘Other’ Agricultural Land (not the Best and Most Versatile for agricultural purposes).</p> <p>The segment is within the Truro AQMA.</p>	Air Quality, Biodiversity, Historic Environment, Land, Soil and Water Resources

PoCA Segment	Key Constraints	SA Themes for which key constraints exist
TK14	<p>TK14 is within an SSSI IRZ for “Residential development of 100 units or more”, associated with the Carrine Common & Penwethers SSSI.</p> <p>The segment adjoins (but is not within) the Gwennap Mining District of the Cornwall and West Devon Mining Landscape World Heritage Site, which is located to the south west. Otherwise, in terms of features of heritage interest, one feature listed on the Cornwall HER is present within the segment. This comprises the extant system of fields between Polstein and Goonvean, which are considered to be of medieval or of earlier origin.</p> <p>A band of fluvial Flood Zone 2 and 3 and medium to high risk flooding from surface water crosses the centre of the segment in a north-south direction. This is associated with the presence of a stream joining the River Tinney, which is located just to the south.</p> <p>Based on the Post 1988 Agricultural Land Classification, TK14 includes patches of Grade 3a Agricultural Land (Best and Most Versatile). However, the segment also includes patches of Grade 3b and ‘Other’ Agricultural Land (not the Best and Most Versatile for agricultural purposes).</p> <p>The segment is within the Truro AQMA.</p>	Air Quality, Biodiversity, Climate Change, Historic Environment, Land, Soil and Water Resources
TK15	<p>TK15 is within an SSSI IRZ for “Residential development of 100 units or more”, associated with the Carrine Common & Penwethers SSSI. A very limited area of deciduous woodland BAP Priority Habitat is present in the south eastern part of TK15.</p> <p>The western part of the segment is within the Gwennap Mining District of the Cornwall and West Devon Mining Landscape World Heritage Site. The route of Chacewater Hill (on the northern boundary) is identified on the Cornwall HER as ‘Highertown - C17 road’.</p> <p>A very small area of fluvial Flood Zone 2 and 3 is located in the south east of the segment. There is also a small strip that is at medium to high risk of flooding from surface water located in the east of the segment.</p> <p>A detailed Agricultural Land Classification has not been undertaken for TK15. As such there is a need to rely on the national ‘Provisional Agricultural Land Quality’ dataset. This shows that the segment consists of Grade 3 Agricultural Land. However, without the subset grading (3a or 3b) it is not possible to tell at this stage whether the agricultural land is considered to be ‘best and most versatile’.</p> <p>There are three Tree Preservation Orders that border the north of the segment, as well as a further TPO on the eastern boundary.</p> <p>The segment is within the Truro AQMA.</p>	Air Quality, Biodiversity, Climate Change, Historic Environment, Land, Soil and Water Resources
TK16	<p>TK16 is within an SSSI IRZ for “Residential development of 100 units or more”, associated with the Carrine Common & Penwethers SSSI.</p> <p>The whole of the segment is within the Gwennap Mining District of the Cornwall and West Devon Mining Landscape World Heritage Site. Features listed on the Cornwall HER include ‘Carbittle - Bronze Age barrow’ and ‘Penstraze Moors - Post Medieval ridge and furrow’ in the north west of the segment, and in the south of the segment, ‘Greenbottom - Post Medieval field system’ and ‘Greenbottom - Post Medieval nonconformist chapel’. The route of Chacewater Hill (on the southern boundary of the segment) is also identified on the Cornwall HER as ‘Highertown - C17 road’.</p> <p>A detailed Agricultural Land Classification has not been undertaken for TK16. As such there is a need to rely on the national ‘Provisional Agricultural Land Quality’ dataset. This shows that the segment consists of Grade 3 Agricultural Land. However, without the subset grading (3a or 3b) it is not possible to tell at this stage whether the agricultural land is considered to be ‘best and most versatile’.</p> <p>The segment is within the Truro AQMA.</p>	Air Quality, Biodiversity, Historic Environment, Land, Soil and Water Resources

PoCA Segment	Key Constraints	SA Themes for which key constraints exist
TK17	<p>TK17 is within an SSSI IRZ for “Residential development of 100 units or more”, associated with the Carrick Heaths SSSI and the Carrine Common & Penwethers SSSI. The northern boundary of TK17 comprises deciduous woodland BAP Priority Habitat, which is located along the stream joining the River Kenwyn. This area is not however extensive within the segment.</p> <p>A Grade II listed milestone is located on the southern boundary of the segment. A number of old roadways are identified on the HER, including a post-Medieval road, C17th road and C19 lane. Otherwise there are approximately ten further features identified on the HER, including post Medieval field boundaries and enclosures, a silver mine, a tin mine, a prehistoric round, a medieval settlement, and a spoil heap. The segment adjoins (but is not within) the Gwennap Mining District of the Cornwall and West Devon Mining Landscape World Heritage Site, which is located to the south west.</p> <p>Two tributaries of the River Kenwyn form the northern and eastern boundaries of TK17. As such a limited area adjoining these boundaries are within areas of fluvial Flood Zone 3 and medium to high risk flooding from surface water. An area of Flood Zone 3a also extends to the northern boundary from the central-east part of the segment. This is associated with the presence of a stream flowing north to the River Kenwyn from Langarth Park Park & Ride.</p> <p>A detailed Agricultural Land Classification has not been undertaken for TK17. As such there is a need to rely on the national ‘Provisional Agricultural Land Quality’ dataset. This shows that the segment consists of Grade 3 Agricultural Land. However, without the subset grading (3a or 3b) it is not possible to tell at this stage whether the agricultural land is considered to be ‘best and most versatile’.</p> <p>Multiple Tree Preservation Orders border the south of the segment.</p> <p>The segment is within the Truro AQMA.</p>	Air Quality, Biodiversity, Climate Change, Historic Environment, Land, Soil and Water Resources

PoCA Segment	Key Constraints	SA Themes for which key constraints exist
TK18	<p>TK18 is within an SSSI IRZ for “Residential development of 100 units or more”, associated with the Carrine Common & Penwethers SSSI. Part of the Treworder Woods County Wildlife Site covers a limited part of the northern section of TK18. This is also covered by deciduous woodland BAP Priority Habitat. A further strip of deciduous woodland BAP Priority Habitat is located along the stream which flows from the south west to the north east through the centre of the segment.</p> <p>The key historic environment constraint in TK18 is the ‘Round 200m north west of Penventinnie’ scheduled monument. This is located in the north eastern part of the segment and is classified as being ‘at risk’ in the 2019 Heritage at Risk Register for South West England. The round north west of Penventinnie is a well-preserved example of its class and will retain archaeological evidence for the monument's construction, the lives of its inhabitants, and the landscape in which they lived. The monument includes a near circular defended late prehistoric enclosure, or round, with an inner bank and wide outer ditch, located just off the summit of a natural north facing spur. The site of the round is on the south eastern facing side of the spur above a tributary of the River Kenwyn. The enclosure possesses the natural outer defences of the Kenwyn River and its tributaries on three sides, the remaining open side being to the south west.</p> <p>Approximately 20 further features have been identified on the Cornwall HER within TK18. This includes in the north eastern part of the segment as follows: ‘Treworder Mill - Medieval ridge and furrow’; ‘Penventinnie - Medieval settlement’; ‘Penventinnie - Medieval boundary bank’; and ‘Penventinnie - Bronze Age barrow’. In the centre and north west of the segment exists the Gloweth Medieval field system, the site of a late C19th settlement at Govers and the mine at Penhaldarva. In the south west and south of the segment there is a further cluster of sites identified on the HER. These include: a post Medieval smallholding; a Medieval boundary bank; mines and quarries; the Venton Green post Medieval settlement; the Maiden Green post Medieval settlement; and the WWII military building reused as a Young Farmers hall at Threemilestone. A number of old roadways and lanes which cross the segment are also listed on the HER.</p> <p>Two tributaries of the River Kenwyn form the northern and western boundaries of TK18. As such, a limited area adjoining these boundaries are within areas of fluvial Flood Zone 3 and medium to high risk flooding from surface water.</p> <p>Based on the Post 1988 Agricultural Land Classification, TK18 includes a patch of Grade 3a Agricultural Land (Best and Most Versatile). However, the segment also includes patches of Grade 3b, Grade 4 and ‘Other’ Agricultural Land (not the Best and Most Versatile for agricultural purposes).</p> <p>The segment is within the Truro AQMA.</p>	Air Quality, Biodiversity, Climate Change, Historic Environment, Land, Soil and Water Resources

Current approach in the Neighbourhood Plan and the development of Neighbourhood Plan policies

Key proposals in the Neighbourhood Plan

4.16 Key proposals included the submission version of the Truro and Kenwyn Neighbourhood Plan are as follows:

- The Neighbourhood Plan sets out an urban extent boundary. Areas within this boundary include the sites for significant growth which have been either permitted or are proposed for allocation in conjunction with the provisions of the Cornwall Local Plan. These include Langarth and Pydar Street, and at the Old County Hall site.
- Outside the urban extent development will be expected to be driven by meeting local housing need and of a small scale that rounds off or infills the current urban extent. It will not support significant new development that would extend the urban area into the countryside or create a direction of growth or extension that should be considered by a new local plan or neighbourhood plan
- The Langarth site, located to the north of Threemilestone is identified by the Neighbourhood Plan for development as a sustainable community comprising a mix of high quality housing, public and private spaces and supporting infrastructure and facilities. In terms of the segments considered above through the SA process, the Langarth development covers TK17, TK18 and a small part of TK1.
- The key employment districts in the Neighbourhood Plan area will be protected and enhanced to reflect their relevant strengths and opportunities, including: Truro City Centre; Newham industrial estate and the port of Truro; Threemilestone industrial estate; and Treliske employment area.
- Key city centre sites at Pydar Street, Moorfield car park and the former bus depot are identified and safeguarded for mixed use development.
- Land at Truro Railway Station and the former Cattle Dock at Claremont Terrace and the immediate viaduct area will be safeguarded for future rail related or transport use.
- Open spaces identified by the Truro and Threemilestone Landscape Strategy that make a significant contribution to public amenity by virtue of their landscape character, appearance and/or function have been locally protected.
- Land that provides important formal or informal recreational space or sports pitch facilities for the Neighbourhood Plan area are locally protected.

Neighbourhood Plan policies

- 4.17 To support the implementation of the vision statement and objectives for the Neighbourhood Plan, and to deliver the proposals presented above, the submission version of the Truro and Kenwyn Neighbourhood Plan puts forward 32 policies to guide new development within the Neighbourhood Plan area. These were developed following extensive evidence gathering and community consultation.
- 4.18 The policies are presented in Table 4.2 below. The SA Report accompanying the pre-submission version of the Neighbourhood Plan presented an appraisal of an earlier version of these policies. This was consulted on in February/March 2020 as part of the Regulation 14 consultation on the Neighbourhood Plan.

Table 4.2: Truro and Kenwyn Neighbourhood Plan policies

Policy Reference Policy Name

Environment	
Policy E1	Sustainable Development
Policy E2	Sustainable Drainage
Policy E3	Sewage Facilities
Policy E4(a)	Development Quality
Policy E4(b)	Building Quality
Policy E5	Green Infrastructure
Policy E6	Character and Setting of Settlements
Policy E7	Character of the Highways and Byways
Economy	
Policy EJ1	Communities at Work
Policy EJ2	Truro City Centre
Policy EJ2(b)	Pydar Street Redevelopment Site
Policy EJ3	The Port of Truro
Policy EJ4	Newham Employment Area
Policy EJ5	Treliske Employment Area
Policy EJ6	Threemilestone Employment Area
Policy EJ7	Employment Land Safeguarding
Education	
Policy ED1	School Site Allocation
Housing	
Policy H1	Meeting Local Housing Need
Policy H2	Care Facilities

Policy Reference Policy Name

Policy H3	Langarth
Leisure and Culture	
Policy LC1	Open Space Requirements
Policy LC2	Local Protected Open Space
Policy LC3	Protection of Formal Open Spaces Playing Pitches
Policy LC4	Cultural and Community Centres, Services and Facilities
Transport	
Policy T1	Transport Strategy Contributions
Policy T2	Safeguarding Railway Land
Policy T3	Sustainable Transport
Historic Environment	
Policy C1	Character and Setting of the Truro Conservation Area
Policy C2	Preservation of the Historic Leats
Policy C3	Boundaries
Policy C4	Demolition in the Conservation Area
Policy C5	Shopfronts and Signs

4.19 The next chapter presents the findings of the assessment of these policies.

5. What are the appraisal findings at this current stage?

Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the submission version of the Truro and Kenwyn Neighbourhood Plan. This chapter presents:
- An appraisal of the current version of the Neighbourhood Plan under the nine SA theme headings; and
 - The overall conclusions at this current stage and recommendations for the next stage of plan-making.

Approach to the appraisal

- 5.2 The appraisal is structured under the nine themes taken forward for the purposes of the SA.
- 5.3 For each theme, ‘significant effects’ of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect ‘characteristics’ are described within the assessment as appropriate.
- 5.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

Air Quality

- 5.5 Cornwall Council is required to monitor air quality across the county to fulfil the requirements of the Local Air Quality Management (LAQM) as set out in Part IV of the Environment Act (1995). Air Quality Management Areas (AQMAs) are declared when there is an exceedance or likely exceedance of an air quality objective. In the local context, the AQMA for Truro was designated in July 2015 due to emissions of nitrogen dioxide and covers most of the built-up areas of the Neighbourhood Plan area¹². This includes the main roads of A390, A39 and B3284 and further ‘hotspot’ areas within the city centre.
- 5.6 In this respect, policies which set out provisions for encouraging the use of sustainable modes of transport, including walking and cycling and public transport use, will support air quality in the Neighbourhood Plan area through promoting non-

¹² Cornwall Council (2018): ‘Truro Air Quality Management Area’, [online] available to access via: <https://www.cornwall.gov.uk/environment-and-planning/environmental-protection/environmental-protection-air-quality/truro-air-quality/> last accessed [10/02/20]

car use and encouraging lower emission forms of transport. Key policies in this regard include Policy T1 'Transport Strategy Contributions' and Policy T3 'Sustainable Transport'. Active travel will also be supported by Policy E5 'Green Infrastructure' which seeks to enhance and extend multi-functional green infrastructure networks and corridors in Truro and Kenwyn.

- 5.7 Alongside policies which seek to protect and enhance the quality of the public realm (see Policy EJ4(a) 'Development Quality', Policy EJ4(b) 'Building Quality' and Policy E6 'Character and Setting of Settlements'), the protection and enhancement of open spaces through Policy LC1 'Open Space Requirements', Policy LC2 'Local Protected Open Space' and Policy LC3 'Protection of Formal Open Spaces and Playing Pitches' will promote good air quality through increasing the attractiveness of walking and cycling in the Neighbourhood Plan area. These policies will also positively contribute to air quality enhancements through supporting the ability of natural processes to dissipate pollutants. This includes through the dispersion and the limiting of deposition of air pollutants such as oxides of nitrogen and particulates.
- 5.8 Overall, whilst the cumulative effects from new development areas and intensification of employment uses in the Neighbourhood Plan area have the potential to lead to increased inputs of the pollutants which affect air quality, the Neighbourhood Plan will help limit potential effects through policies which will protect and enhance green infrastructure networks and support the use of sustainable modes of transport. These policies are further discussed within the appraisals for the 'Biodiversity and Geodiversity', 'Climate Change', 'Health and Wellbeing' and 'Transportation' SA themes (below).

Biodiversity and Geodiversity

- 5.9 The Neighbourhood Plan area is relatively constrained in biodiversity terms, with several European and nationally designated sites located within and within proximity to its boundaries. This includes the Fal and Helford Special Area of Conservation (SAC), Carrine Common SAC, the Malpas Estuary Site of Special Scientific Interest (SSSI), Carrine Common and Penwethers SSSI and Carrick Heaths SSSI, containing habitats and species listed in the annexes of both the European Habitats Directive (92/43/EEC) and the European Birds Directive (79/409/EEC). Additionally, the whole of the Neighbourhood Plan area is within the Zone of Influence (Zol) for the Penhale Dunes SAC. At the local level, there are five County Wildlife Sites (CWS) and a variety of Biodiversity Action Plan (BAP) Priority Habitats and Species within and adjacent to the Neighbourhood Plan area. Whilst no significant negative effects on biodiversity can be readily identified, there will be a need for potential effects on biodiversity linked to future development in the Neighbourhood Plan area to be avoided and mitigated. Therefore, the Neighbourhood Plan sets out provisions which will 1) help limit potential effects from new development on features and areas of biodiversity interest, 2) support the resilience of ecological networks and 3) deliver net gains through new development areas.
- 5.10 The Neighbourhood Plan has been accompanied by a Habitats Regulations Assessment (HRA) to ascertain the potential for likely significant effects (LSE) on the integrity of European designated biodiversity sites present locally, either alone or in combination with other plans or projects. The HRA states that ten of the policies within the Neighbourhood Plan have the potential for LSE on European sites. Specifically, the Fal and Helford SAC (located within the Neighbourhood Plan area)

was identified to be vulnerable to the following impact pathways: direct land take; water pollution; and public access / disturbance. Similarly, the Carrine Common SAC (located adjacent to the Neighbourhood Plan area) was identified to be vulnerable to public access / disturbance. In this respect, the conclusions of the HRA proposes the following recommendations for the Neighbourhood Plan to consider:

- The HRA recommends that the following sentence should be added into Policy EJ3 'The Port of Truro': *"Any proposal brought forward within the Port of Truro development area will require a project specific Habitats Regulations Assessment to ensure no significant adverse effects upon the integrity of the SAC. Development which would cause a significant effect on the Fal and Helford Special Area of Conservation will not be permitted."*
- The HRA recommends that the following sentence should be inserted into a relevant policy (i.e. Policy E1 'Sustainable Development') which applies the same protections to **all** European sites as Policy EJ3 'The Port of Truro' and Policy EJ4 'Newham Employment Area' applies for the Fal and Helford SAC. Specifically: *"Development which would cause significant adverse effect on any European site will not be permitted."*
- The HRA recommends that the following text is inserted into Policy E1 'Sustainable Development' or another appropriate policy to reinforce compliance with the Cornwall Local Plan: *"All residential development will need to be compliant with the Cornwall Local Plan's European Site Mitigation Supplementary Planning Documents (SPD) for terrestrial sites and, when it emerges, for marine and estuarine sites."*

5.11 Provided the above recommendations are included within the policies, the HRA concludes that the Neighbourhood Plan will not result in an adverse effect on the integrity of any European sites (either alone or in combination). Nonetheless, it is important to acknowledge that several Neighbourhood Plan policies outline provisions which aim to safeguard European designated sites from plan proposals. For example, the policies for the Port of Truro (Policy EJ3) and Newham Employment Area (Policy EJ4) state that new development will be permitted where it contributes to the realisation of the key nature conservation objectives for the Fal and Helford SAC and the Malpas Estuary SSSI. Both policies also state that development which would cause a significant adverse effect on the Fal and Helford SAC will not be permitted. Whilst there is further scope for additional clarity to be provided through the policies for the Port of Truro and Newham Employment Areas relating to the avoidance and mitigation of effects on the Fal and Helford SAC and the Malpas Estuary SSSI, it is recognised that the SEA process which will be undertaken separately to support the development of the masterplan for the Port of Truro area will consider potential effects on these nature conservation sites.

5.12 In relation to the SSSIs located within and within proximity to the parish, the Neighbourhood Plan area overlaps with SSSI Impact Risk Zones (IRZs) for the types of development potentially to be taken forward through the Neighbourhood Plan (i.e. residential, rural residential and rural non-residential). As the proposed level of development in the Neighbourhood Plan area will likely exceed the IRZ thresholds at most locations, consultation with Natural England will therefore be required prior to development to ensure that appropriate mitigation measures are included through proposals.

- 5.13 Published in July 2021, paragraph 174 (d) within the revised NPPF¹³ states that planning policies and decisions should contribute to and enhance the natural and local environment by '*minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks*', with paragraph 32 outlining that spatial development strategies should demonstrate how opportunities for net gains have been addressed. An environmental net gain principle for development is also embedded within the goals and policies of the UK Government's 25-Year Environment Plan¹⁴ which was published in January 2018 and by the Environment Act enacted in November 2021.¹⁵
- 5.14 The Environment Act 2021 makes provision for biodiversity gain to be a condition of planning permission in England, in addition to biodiversity gain site registers and biodiversity credits. The Act recognises there is a duty to conserve and enhance biodiversity, by identifying priorities for an area using biodiversity reports and local nature recovery strategies. Local nature recovery strategies will identify biodiversity priorities for the strategy area as well as a local habitat map. Furthermore, habitat maps are expected to include recovery and enhancement areas which are or could become of importance for biodiversity.
- 5.15 In this context, development proposals will be expected to demonstrate how they minimise negative impacts and deliver biodiversity net gains through appropriate methods. In particular, the principle of biodiversity net gain is closely embedded within the Neighbourhood Plan policies. Key policies in this regard include Policy H1 'Meeting Local Housing Need', which affirms that applications for new housing developments will only be permitted where they retain and enhance existing habitats and important green spaces within the site (amongst other considerations). Similarly, Policy H3 'Langarth' stipulates that the Masterplan for the garden village must demonstrate how the principles of sustainable development will be achieved across the site, including (but not limited to) the development of a planned and coherent network of multi-functional green infrastructure that retains and strengthens existing networks and corridors across the site, minimises the loss of trees and Cornish hedges, results in biodiversity net gains and prioritises the retention of existing biodiversity and habitats. Whilst the Northern Access Road (NAR), which will form part of the Langarth proposals and runs between West Langarth and Treliske Hospital, has some potential to impact on existing biodiversity, this forms part of existing planning consents. The route will also be designed in a way which will support its role as a key green infrastructure link, including through tree planting (Policy H3, Langarth). Ecological networks will also be supported by Policy EJ2(b) 'Pydar Street Redevelopment Site' which sets out a principle for biodiversity net gains on site through green and blue infrastructure provision. This will be further supported by Policy E4 (a) 'Development quality', which highlights that net gain will be delivered through high quality green infrastructure provision, and supported by the retention of existing natural features, habitat, trees and hedgerows and the delivery of new tree planting (including the planting of one tree per dwelling).
- 5.16 This is expanded on through Policy E5 'Green Infrastructure' which seeks to promote the Truro and Kenwyn Green Infrastructure Strategy and Open Space Strategy as the

¹³ MHCLG (2021): 'National Planning Policy Framework', [online] available to access via: <

<https://www.gov.uk/government/publications/national-planning-policy-framework--2> > last accessed [07/02/22]

¹⁴ DEFRA (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via: <<https://www.gov.uk/government/publications/25-year-environment-plan>> last accessed [05/11/19]

¹⁵ Environment Act 2021: available to access via: < <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted> > last accessed [07/02/22]

key means to deliver biodiversity improvements in the Neighbourhood Plan area. Specifically, the policy seeks to only allow development where a net increase in biodiversity is facilitated through the creation of new habitats and the retention of key habitats, trees and wildlife corridors. It also seeks to ensure that the areas of biodiversity and green space are preserved or enhanced or appropriately buffered by proposals and are not negatively impacted or reduced in size, scale or connectivity to wider networks of green infrastructure. As such, the policy provides a proactive basis for the protection and enhancement of areas of biodiversity value in the Neighbourhood Plan area. This will be supported through policies which aim to protect and enhance Truro and Kenwyn's open spaces by retaining features and areas of biodiversity interest and supporting ecological networks, including: Policy LC1 'Open Space Requirements', Policy LC2 'Local Protected Open Space' and Policy LC3 'Protection of Formal Open Spaces and Playing Pitches'.

- 5.17 Ecological networks will also be strengthened through Policy E4(a) 'Development Quality' which outlines support for development proposals that create interlinked open spaces wherever possible, including the provision of at least one tree per dwelling within new development areas and meeting the principles of the 'Building for Nature' standards. Policy EJ2(b) 'Pydar Street Redevelopment Site' states that proposals for the regeneration of this area will be subject to a masterplan that enables green infrastructure provision, including the retention of existing trees and habitats on and around the site, habitat creation, and biodiversity net gains on site. The provision of these policies will ensure that ecological sensitivities are appropriately considered during the planning, construction and operational phases for new development proposals which come forward during the plan period, whilst also delivering net gains. As such, the Neighbourhood Plan sets out a range of provisions which will support and enhance habitats, species and ecological networks in the Neighbourhood Plan area.

Climate Change

- 5.18 The Neighbourhood Plan acknowledges that Cornwall Council resolved to declare a 'climate emergency' in January 2019, made in the context of the Local Planning Authority's target for Cornwall to become carbon neutral by 2030. In the context of the Truro and Kenwyn Neighbourhood Plan, parishioners view the declaration as a significant 'call for action' to tackle the consequences and causes of the climate crisis and seek to embed environmentally sustainable practices in response to the challenges faced. Several policies within the Neighbourhood Plan emphasise the importance of mitigating and adapting to climate change.
- 5.19 In terms of climate change mitigation, road transport is an increasingly significant contributor to greenhouse gas emissions in the Neighbourhood Plan area. In this respect, Policy T1 'Transport Strategy Contributions' and Policy T3 'Sustainable Transport' have the potential to limit contributions to greenhouse gas emissions from transport through promoting the use of non-car modes of transport and active travel. These policies are further discussed within the appraisal for the 'Transportation' SA theme. Nonetheless, it is important to acknowledge that the level of development supported through the Neighbourhood Plan will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of Truro and Kenwyn parishes.

- 5.20 In terms of limiting emissions from residential and commercial developments, several Neighbourhood Plan policies promote the energy efficiency of new development areas. This includes Policy EJ1 'Communities at Work', which seeks to ensure that new employment development provides sustainable forms of construction, energy conservation measures and renewable energy. Likewise, Policy E4(a) 'Development Quality' affirms that applications for development will be expected to provide the following measures which contribute to climate change mitigation efforts, including: energy efficient design; a layout that actively promotes energy conservation and incorporates sustainable forms of construction; energy conservation measures; and renewable energy technology. Policy E4(b) 'Building Quality' goes on to state that new buildings should achieve a high level of energy efficiency, aiming towards zero carbon and incorporating renewables. This is reaffirmed through Policy H3 'Langarth'. The provisions of these policies will further contribute to climate change mitigation efforts.
- 5.21 With reference to adapting to the effects of climate change, there are areas of land in Flood Zone 2 and 3 located adjacent to the main watercourses in the Neighbourhood Plan area, namely: River Kenwyn and River Allen (and their tributaries). Both rivers drain into the Fal Estuary, with land immediately adjacent to the estuary also within Flood Zone 3. Surface water flood risk issues are also prevalent within the built-up areas of Truro, particularly affecting the local road networks. While it is anticipated that the provisions of the NPPF and the Cornwall Local Plan will help to ensure that developments are located away from the areas at highest risk of flooding, the Neighbourhood Plan takes a pro-active approach to tackling flood risk issues.
- 5.22 For example, Policy H1 seeks to ensure that new housing development does not add to flood risk or result in the loss of flood storage capacity. Policy E2 'Sustainable Drainage' seeks to reduce the impact of surface water run-off from new sites through implementing sustainable drainage regimes to limit potential effects. This includes through the implementation of strategic and local level Sustainable Drainage Systems (SuDS), decreasing surface water run-off in 'problem drainage catchments', utilising green infrastructure provision where possible as part of the design of SuDS design and ensuring that in areas at risk of flooding, proposals do not increase flood risk.
- 5.23 Policy EJ2(b) 'Pydar Street Redevelopment Site' states that proposals for the regeneration of this area will be subject to a masterplan that incorporates SuDS that keep as much water above ground as possible, the use of green walls or roofs, and delivers energy and resource efficiency that reduces the carbon footprint of the development (reusing materials from the demolition of existing buildings on site). Policy H3 'Langarth' also stipulates that the Masterplan for the garden village must demonstrate how the principles of sustainable development will be achieved across the site, including (but not limited to) the development of a planned and coherent network of multi-functional green infrastructure that prioritises tree and hedge planting, sustainable drainage features, green walls and roofs.
- 5.24 Enhancements to green infrastructure networks promote climate change mitigation through supporting carbon sequestration and promoting sustainable modes of transport, and climate change adaptation through helping to limit the effects of extreme weather events and regulating surface water run-off. Key policies in this regard include Policy E5 'Green Infrastructure', Policy LC1 'Open Space Requirements', Policy LC2 'Local Protected Open Space' and Policy LC3 'Protection

of Formal Open Spaces and Playing Pitches'. The Neighbourhood Plan's green infrastructure policies will also help increase the resilience of ecological networks to the effects of climate change through seeking to protect, enhance and create features and areas of biodiversity value.

Landscape

- 5.25 In terms of nationally protected landscapes, the 'South Coast – Central' section of the Cornwall Area of Outstanding Natural Beauty (AONB) is located directly to the south east of the Neighbourhood Plan area. Local features of interest include tree preservation order (TPOs) and TPO areas which have been designated for their amenity value and four Landscape Character Areas (LCAs), alongside buildings, Cornish hedges, milestones, lanes, fords and open spaces which positively contribute to the character and identity of Truro and Kenwyn. As such, policies within the Neighbourhood Plan seek to address these sensitivities and have a strong focus on protecting landscape and townscape quality.
- 5.26 For example, Policy E6 'Character and Setting of Settlements' stipulates that development proposals will not be supported if they would significantly impact or result in the loss or erosion of the special qualities and setting of the Cornwall AONB. Policy E4(a) 'Development Quality' outlines that new development areas should enhance the quality of local spaces, taking account and reflecting the physical context, local character and density to provide good places to live. This is reaffirmed through Policy E4(b) 'Building Quality' which seeks to ensure that the external finishes on new buildings fit with the local palette of building materials. Policy C3 'Boundaries' states that care should be given to the retention of Cornish hedges and natural boundaries and locally characteristic boundary treatments.
- 5.27 The quality of the environment around the settlements of Truro, Threemilestone and Shortlanesend is valued by the community. This comprises both the landscape setting of the settlements and the boundaries between urban and rural areas. In this respect, Policy E6 'Character and Setting of Settlements' seeks to ensure that new development areas respect the special character and wider setting of the settlements of Truro, Threemilestone and Shortlanesend and development will only be permitted where it would provide a positive impact by means of its scale, height, materials or layout, whilst also protecting views and preventing the significant loss or erosion of the 'green gaps' between rural and urban areas. Policy E7 'Character of the Highways and Byways' also seeks to ensure that character of byways and highways in the Neighbourhood Plan area are protected through the appropriate use of materials, sympathetic landscaping and integrating elements such as signs and road markings with the character of the space (as far as possible). This will protect and enhance the sense of place and identity of the Neighbourhood Plan area.
- 5.28 With reference to new development areas within the Neighbourhood Plan area, effects on landscape and townscape quality will be supported through the implementation of high quality and sensitive design techniques. In this respect, Policy H1 'Meeting Local Housing Need' states that development proposals will only be permitted where they are well integrated by means of scale, location and character with the urban area of Truro or are within the development boundary of Threemilestone or Shortlanesend. This will help to limit high levels of inappropriate development in the open countryside.

5.29 Policy EJ2(b) 'Pydar Street Redevelopment Site' highlights that proposals for the regeneration of this area will be subject to a masterplan that delivers natural landscaping. This is reaffirmed through Policy EJ5 'Treliske Employment Area' and Policy EJ6 'Threemilestone Employment Area', highlighting that proposals for new development areas should achieve high quality design and layout of buildings, spaces and landscaping. Furthermore, Policy H3 'Langarth' confirms that the Masterplan for the garden village must demonstrate how the principles of sustainable development will be achieved across the site, including (but not limited to):

- The creation of green gaps across the site which contribute to the development of a planned and coherent network of multi-functional green infrastructure that incorporates tree and hedge planting and minimises the loss of Cornish hedges (with translocation or replacement compensatory hedge construction utilising existing materials stone where practicable);
- Development that is genuinely reflective of and responds to the local character in terms of materials and utilises typical building forms that work with the topography of the sites and minimise the need for large retaining structures or land sculpting;
- Development will be required to include the sensitive incorporation of historical, topographical and natural features of the site and draw on the findings of the recent Truro and Threemilestone Landscape Character Assessment undertaken alongside the Neighbourhood Plan.
- Benchmarks of good quality development and/or an appropriate level of design coding that will assist the realisation of the expected quality of development; and
- Measures to prevent further incursion of new built development into the surrounding countryside unless it is necessary for the provision of new green infrastructure or recreation.

5.30 More broadly, the Neighbourhood Plan also has a strong focus on local distinctiveness. This will help safeguard landscape features which contribute to the special qualities and visual amenity of the Neighbourhood Plan area. Key policies in this respect include Policy E5 'Green Infrastructure', Policy LC1 'Open Space Requirements', Policy LC2 'Local Protected Open Space' and Policy LC3 'Protection of Formal Open Spaces and Playing Pitches'. The delivery of new and improved green infrastructure provision is most effective when it is planned at a range of scales, including regional, sub-regional and local levels. This enables a coordinated approach to be taken which can seek to ensure that the full range of benefits from a high quality green infrastructure network are realised. It is anticipated that such an approach will be more effective in designing and managing green infrastructure as a multi-functional resource capable of delivering a wide range of environmental and quality of life benefits for the Neighbourhood Plan area in comparison to a more piecemeal approach.

Historic Environment

5.31 The Neighbourhood Plan area has a rich historic environment, recognised through the diversity of features and areas that are internationally, nationally and locally valued for their cultural heritage interest located within and within proximity to its boundaries. This includes the Cornwall and West Devon Mining Landscape World Heritage Site (WHS) to the south and west of Threemilestone (specifically Area 6:

Gwennap Mining District with Devoran and Perran and Kennall Vale), along with 13 scheduled monuments, the Grade I listed Truro Cathedral, eight Grade II* and over 300 Grade II listed buildings and structures. Many of the nationally designated listed buildings are within the boundaries of Truro Conservation Area, with its boundaries covering the central area of the city. According to the 2019 Heritage at Risk Register for South West England¹⁶ two scheduled monuments within the Neighbourhood Plan are 'at risk', specifically: 'Round 200m north west of Penventinnie, Kenwyn' and 'Standing cross at High Cross, 30m west of Truro Cathedral, Truro'.

- 5.32 It is important to note that the level of growth proposed for the Neighbourhood Plan area has the potential to impact upon the fabric and setting of designated and non-designated heritage assets and features. In this respect, the Neighbourhood Plan sets out specific policies for significant development at Langarth and Pydar Street.
- 5.33 In response to this, Table 5.1 and Table 5.2 discusses the proposals' potential impacts on the key heritage assets located in the vicinities of the development areas, and signposts the Neighbourhood Plan policies which seek to limit these impacts.
- 5.34 The Neighbourhood Plan policies which have a focus on conserving and enhancing the significance of buildings and structures of architectural or historic interest, both designated and non-designated and their settings, are subsequently discussed.

¹⁶ Historic England (2019): 'Heritage at Risk Register for South West England', [online] available to download at: <<https://historicengland.org.uk/images-books/publications/har-2019-registers/>> last accessed [11/02/20]


Table 5.1: Overview of potential impacts of key heritage assets from Langarth proposals, and response of Neighbourhood Plan policies

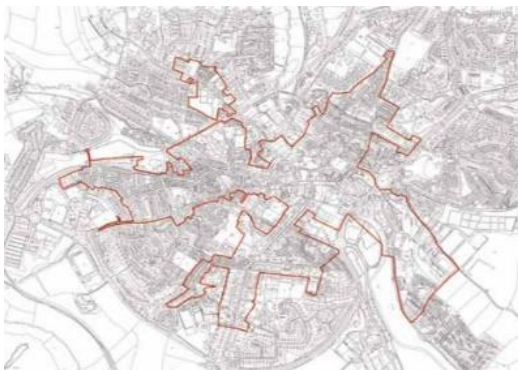
Heritage asset affected	What contribution does the development area make to the significance of the heritage asset?	Potential impact of development on significance	Policies which will help avoid/mitigate effect or secure enhancement (see paras 5.35 to 5.42 for further information)
Round 200m north west of Penventinnie (Scheduled Monument)	 <p>The round north west of Penventinnie is a well-preserved example of its class and will retain archaeological evidence for the monument's construction, the lives of its inhabitants, and the landscape in which they lived. The monument includes a near circular defended late prehistoric enclosure, or round, with an inner bank and wide outer ditch, located just off the summit of a natural north facing spur. The site of the round is on the south eastern facing side of the spur above a tributary of the River Kenwyn. The enclosure possesses the natural outer defences of the Kenwyn River and its tributaries on three sides, the remaining open side being to the south west.</p> <p>The site is listed on the Heritage at Risk Register as “Generally unsatisfactory with major localised problems” with its Principal Vulnerability identified as: “Animal burrowing – extensive”.</p> <p>The round is not within the boundaries of the proposed development area of Langarth. However, it is located c.120m to the south, on the opposite site of the valley, with some views in and out of potential development areas.</p>	<p>Whilst development will not take place in the immediate vicinity of the scheduled monument, the Langarth development may have significant impacts on the site's setting without appropriate screening or integration of open space/green infrastructure provision. This is given the relative proximity of potential development areas to the site, (with some visibility to and from the site) and effects on its sense of place.</p> <p>Due to the presence of the scheduled monument, and other features located nearby (including the Hillfort 225m north east of Bosvisack), there is significant archaeological potential in the area. This will require further evaluation.</p>	Neighbourhood Plan Policy C3, E4(a), E5, E7, H3

Heritage asset affected	What contribution does the development area make to the significance of the heritage asset?	Potential impact of development on significance	Policies which will help avoid/mitigate effect or secure enhancement (see paras 5.35 to 5.42 for further information)
<p>Hillfort 225m north east of Bosvisack (Scheduled Monument)</p>	 <p>The small multivallate hillfort north east of Bosvisack survives well as one of only few examples in Cornwall. The monument will contain archaeological information relating to the construction and use of the site, the lives of its inhabitants, and the landscape in which they lived.</p> <p>Small multivallate hillforts are defined as fortified enclosures of varying shape, generally between 1 and 5ha in size and located on hilltops. They are defined by boundaries consisting of two or more lines of closely set earthworks spaced at intervals of up to 15m. They date to the Iron Age period, most having been constructed and occupied between the sixth century BC and the mid-first century AD. Small multivallate hillforts are generally regarded as settlements of high status, occupied on a permanent basis.</p> <p>The hillfort is located approximately 340m north of potential development areas. It is screened from view by topography (including a valley) and existing woodland.</p>	<p>The hillfort would not be physically impacted by the proposed development, but its setting and views would be altered. The southern views from the hillfort are made of agricultural fields. These agricultural views form part of the asset's setting. The creation of the proposed development would alter the asset's setting and views with the new residential nature of the site and the proposed development needs to ensure this impact is minimised and mitigated through controls over the heights of buildings and use of strategic open space. There is also significant archaeological potential in the area, due to the presence of the scheduled monument and nearby Round 200m north west of Penventinnie. This is subject to further evaluation.</p>	<p>Neighbourhood Plan Policy C3, E4(a), E5, E7, H3</p>



Heritage asset affected	What contribution does the development area make to the significance of the heritage asset?	Potential impact of development on significance	Policies which will help avoid/mitigate effect or secure enhancement (see paras 5.35 to 5.42 for further information)
Milestone at SW 766457 NE (Grade II listed)	<p>The milestone is located on the northern side of the A390 dates from early C19 (or was potentially recut circa early C19). Comprising a painted dressed granite monolith, it is rectangular-on-plan round-headed with shallow dressed panel facing road. The milestone was re-sited subsequent to road widening.</p> 	No impact. The site is within a road cutting, and heavily screened by surrounding vegetation. No views to and from the milestone will be affected from new development areas.	N/A
Croft West (Grade II listed)	<p>Croft West Farmhouse is located approximately 150m north of potential development areas associated with Langarth.</p> <p>Croft West farmhouse dates from the early-mid C18. Whilst significantly altered, Croft West is an important house locally and its proportions still make an important contribution to the landscape.</p> <p>The site is outside of potential development areas and is screened to the south by existing farm buildings, woodland and a stream valley.</p>	No impact. No views to and from the farmhouse will be affected from new development areas given existing screening from farm buildings, the presence of woodland and topography.	N/A

Table 5.2: Overview of potential impacts of key heritage assets from Pydar Street development proposals, and response of Neighbourhood Plan policies

Heritage asset affected	What contribution does the development area make to the significance of the heritage asset?	Potential impact of development on significance	Policies which will help avoid/mitigate effect or secure enhancement
Truro Cathedral (Grade I listed)	 <p>Truro Cathedral dates from 1880. It was designed by J L Pearson in an Early English style of architecture. It has spires of the Normandy type. The eastern parts were built before Pearson's death in 1897. The nave, central tower and western towers were carried out to the original design by his son F L Pearson between 1895 and 1910. The early 16th century south aisle of the former parish church of St Mary was kept and became the cathedral's St Mary's Aisle.</p> <p>The development area is located approximately 170m to the north west of Truro Cathedral. Whilst there are limited views from within the development area, Truro Cathedral is visible from Pydar Street and from the Railway Viaduct (both of which are located adjacent to the development area).</p> <p>The proposed development area currently detracts significantly from some views to and from the cathedral. This is given the poor quality public realm in the area, and the insensitive design of the current townscape</p>	The regeneration and redevelopment of Pydar Street has significant potential to enhance the setting of Truro Cathedral, particularly the viewpoints from Pydar Street and the Railway Viaduct. This will be achieved through the application of sensitive design.	Neighbourhood Plan Policy C1, C2, C3, C4, C5, E4(b), EJ2(b)

Heritage asset affected	What contribution does the development area make to the significance of the heritage asset?	Potential impact of development on significance	Policies which will help avoid/mitigate effect or secure enhancement
<p>Truro Conservation Area</p> <p>(Designated in April 2010)</p>	 <p>In terms of its buildings and layout, the significant qualities of the Conservation Area can mostly be traced from the way the city developed from the Middle Ages until the First World War.</p> <p>Those strengths can be summarised under five headings, as listed within the Conservation Area Appraisal: The topographical setting of the city, and the role that water (rivers, the waterfront, the leats) plays in it; the substantial survival of its medieval layout, including its streets and alleys (or opes); the compactness of its city centre; the survival of historic buildings, principally of the 18th to 19th Centuries; the 280 listed buildings in the Conservation Area; the role of the Cathedral as the landmark which defines the city.</p> <p>Truro Conservation Area is located adjacent to the northern and southern boundaries of the development area. There are views of the development area from the Conservation Area, including from properties along Pydar Street (south east) and the Railway Viaduct.</p> <p>The proposed development area currently detracts significantly from the setting of the Conservation Area. This is given the poor quality public realm in the area, and the insensitive design of the current townscape.</p>	<p>The regeneration and redevelopment of Pydar Street has significant potential to enhance the setting of Truro Conservation Area through the application of sensitive design.</p>	<p>Neighbourhood Plan Policy C1, C2, C3, C4, C5, E4(b), EJ2(b)</p>

Heritage asset affected	What contribution does the development area make to the significance of the heritage asset?	Potential impact of development on significance	Policies which will help avoid/mitigate effect or secure enhancement
<p>Railway Viaduct including redundant piers, over River Allen</p> <p>(Grade II listed)</p>	 <p>Designed by Brunel, the Railway viaduct, including redundant piers of original viaduct, comprises dressed granite Brunel piers otherwise of rock-faced granite with brick arches and rendered parapet fascia. There are 15 surviving Brunel piers located 60 feet apart. These were originally spanned by fan-shaped timber constructions. Additional detailing on the Viaduct includes rectangular-on-plan piers (except for 5 Brunel piers which are H on plan), round arches carried on tapered piers with corbels for timber centring, brick above level of piers, and iron refuges.</p> <p>The Railway Viaduct is located adjacent to the northern boundary of the development area and is within the boundary of the Truro Conservation Area. The proposed development area currently detracts significantly from the setting of the viaduct. This is given the poor quality public realm in the area, and the insensitive design of the current townscape.</p>	<p>The regeneration and redevelopment of Pydar Street has significant potential to enhance views to and from the Railway Viaduct, if high quality and sensitive design and layout is integrated within new development areas.</p>	<p>Neighbourhood Plan Policy C1, C2, C3, C4, C5, E4(b), EJ2(b)</p>
<p>24 and 25 Pydar Street</p> <p>(Grade II listed)</p>	 <p>Pair of 19th Century 3-storey town houses comprising of local rubble with granite dressings, slate roof, 2 brick axial stacks, slate hanging to right-hand gable, and a symmetrical 2-window front. There are slightly cambered arches with key blocks over the doorways at the far left and right of the town houses.</p> <p>The town houses are located directly to the south east of the development area and is also within the boundary of Truro Conservation Area. There are direct views from the town houses into the development area. The proposed development area currently detracts significantly from the setting of the building, given the poor quality public realm in the area, and the insensitive design of the current townscape.</p>	<p>The regeneration and redevelopment of Pydar Street has significant potential to enhance views from the town houses if high quality and sensitive design and layout is integrated within new development areas.</p>	<p>Neighbourhood Plan Policy C1, C2, C3, C4, C5, E4(b), EJ2(b)</p>

Heritage asset affected	What contribution does the development area make to the significance of the heritage asset?	Potential impact of development on significance	Policies which will help avoid/mitigate effect or secure enhancement
<p>22 and 23 Pydar Street</p> <p>(Grade II listed)</p>	 <p>Pair of small 19th century houses, now offices, comprising of local rubble with granite dressings, asbestos slate roof, brick axial stacks and a symmetrical 3-window front. The central pair of doorways have panelled doors and overlights. Additional detailing includes shallow segmental arches with keyblocks over original 12-pane hornless sashes.</p> <p>The houses are located directly to the south east of the development area and are also within the boundary of Truro Conservation Area. There are direct views from the houses into the development area. The proposed development area currently detracts significantly from the setting of the building, given the poor quality public realm in the area, and the insensitive design of the current townscape.</p>	<p>The regeneration and redevelopment of Pydar Street has significant potential to enhance views from the buildings if high quality and sensitive design and layout is integrated within new development areas.</p>	<p>Neighbourhood Plan Policy C1, C2, C3, C4, C5, E4(b), EJ2(b)</p>
<p>21 and 21A Pydar Street</p> <p>(Grade II listed)</p>	 <p>18th Century town house, now shop, with incised stucco on masonry to first floor, stucco on studwork above, and a fairly steep slurried scantle slate roof. The town house was altered to create a shop in the late 19th – early 20th century. The town house is 3 storey building with a symmetrical 3-window front.</p> <p>The town house is located directly to the south east of the development area and is also within the boundary of Truro Conservation Area. There are direct views from the town house into the development area. The proposed development area currently detracts significantly from the setting of the building, given the poor quality public realm in the area, and the insensitive design of the current townscape.</p>	<p>The regeneration and redevelopment of Pydar Street has significant potential to enhance views from the town house buildings if high quality and sensitive design and layout is integrated within new development areas.</p>	<p>Neighbourhood Plan Policy C1, C2, C3, C4, C5, E4(b), EJ2(b)</p>

Heritage asset affected	What contribution does the development area make to the significance of the heritage asset?	Potential impact of development on significance	Policies which will help avoid/mitigate effect or secure enhancement
<p>20 Pydar Street (Grade II listed)</p>	 <p>Early 19th century small town house, now shop, including an incised stucco on studwork to front and asbestos slate roof with large central gable dormer. The house is a 2 storey building with an attic, with a 2-window range and late 19th – early 20th century horned 4-pane sashes within moulded wooden architraves.</p> <p>The town house is located directly to the south east of the development area and is also within the boundary of Truro Conservation Area. There are direct views from the town house into the development area. The proposed development area currently detracts significantly from the setting of the building, given the poor quality public realm in the area, and the insensitive design of the current townscape.</p>	<p>The regeneration and redevelopment of Pydar Street has significant potential to enhance views from the town house buildings if high quality and sensitive design and layout is integrated within new development areas.</p>	<p>Neighbourhood Plan Policy C1, C2, C3, C4, C5, E4(b), EJ2(b)</p>

- 5.35 With reference to new development areas, Policy H1 'Meeting Local Housing Need' highlights that all developments must make a positive contribution to the built environment in terms of scale, materials and bulk. Policy EJ2 'Truro City Centre' states that proposals for new development areas at this location will be permitted where they incorporate high quality design and construction which integrates well with Truro's distinctive and historic character including its setting, distinctive buildings and quality of the public realm. Policy EJ2(b) 'Pydar Street Redevelopment Site' states that proposals for the regeneration of this area will be subject to a masterplan that ensures a positive and respectful response to the historic environment, integrating new development areas with the form of the surrounding areas (in terms of scale and materials) and retaining key views to and from the viaduct and Truro Cathedral which positively contribute to the setting of these heritage features. Additionally, the areas of land surrounding Govers Farm is important to the setting of the 'Hillfort 225m north east of Bosvisack' Scheduled Monument. The current edge between the existing permissions at Willow Green and Govers Farm will need to be carefully considered by the emerging Masterplan for Langarth (see Policy H3) to ensure that it is an appropriate response that protects its setting.
- 5.36 A further element to consider is that the planning applications associated with Langarth have been supported by in depth heritage assessments. These were carried out to support the Environmental Impact Assessment process, and will inform detailed development proposals. Specific studies include relating to potential impacts on the Bosvisack Hillfort¹⁷, the Round 200m north west of Penventinnie¹⁸ and the World Heritage Site¹⁹.
- 5.37 Throughout the rural area of Truro and Kenwyn there are traces of the former industries and lifestyles that have shaped the parishes, from food production to industry. The Neighbourhood Plan recognises that these often forgotten features of the historic landscape, such as leats and enclosures, are important to the identity and the setting of the WHS. In this respect, Policy C2 'Preservation of the Historic Leats' states that development proposals must retain and respect the integrity of the unique and historic leats system in Truro and prevent damage or detriment to their appearance or operation. Development should ensure that the system remains uncovered and operational, restoring defunct parts of the leats system where appropriate. Likewise, the policy states that development in the rural Allen and Kenwyn Valleys will be expected to preserve and enhance the course and integrity of the leat systems present in those areas.
- 5.38 The Neighbourhood Plan acknowledges that the entirety of Truro city centre and much of the surrounding area is designated as a Conservation Area. This was reappraised and extended in the Truro Conservation Character Area Assessment and endorsed by Cornwall Council in April 2010. It is particularly important that the character of the Conservation Area, made up of a combination of buildings (including listed, unlisted and non-designated assets), streets and spaces is protected and enhanced. A Conservation Area Management Plan was created in 2008 and has been endorsed by the City Council and Cornwall Council in April 2010. This helps to describe the character of the Conservation Area and its special spaces and materials

¹⁷ Arcadis (July 2021) Langarth Garden Village, Heritage Impact Assessment, Bosvisack Hillfort

¹⁸ Arcadis (September 2020) Langarth Garden Village, Heritage and Landscape Statement of Significance for the Scheduled Round 200m north west of Penventinnie

¹⁹ Arcadis (October 2020) Langarth Garden Village, Heritage Impact Assessment: The Gwennap Area of the Cornish Mining World Heritage Site

and should therefore be a key consideration and reference point for development proposals.

5.39 In this context, Policy C1 'Character and Setting of the Conservation Area' states that development in the area will only be permitted where it respects, preserves and enhances the special character and wider setting in terms of:

- The scale, height, form, detail, materials, colour and massing of the proposal;
- The relationship between the proposal and listed buildings and structures and non-designated heritage assets;
- The character and appearance of rear and side elevations where these are visible or form a characteristic feature of the area; and
- Preservation and enhancement of open spaces and spaces between buildings.

5.40 Where a development proposal would impact the setting of the Conservation Area, important viewpoints must be protected and enhanced through the provisions of Policy C1. Demolition in the Conservation Area will only be permitted in exceptional circumstances, as outlined through Policy C4. Policy C5 'Shopfronts and Signs' also highlights that proposals for the development of new (or the refurbishment of) existing shop frontages and other commercial premises within Truro Conservation Area or areas of historic buildings will be permitted where the proposed alteration or replacement is sympathetic to and respects the architectural integrity of the building. In this respect, special attention will be given to the scale, pattern of frontages, vertical or horizontal emphasis, materials, colour and detailed design.

5.41 It should also 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, archaeological features and key distinctive buildings in the area are of value for local people in the county. Following a high-level review of the HER for Cornwall and Scilly, there are over 400 records within Truro Parish including a variety of structures and archaeological finds from the medieval period (including settlements, castles, friaries, workhouses, schools and quays). There are also over 70 records within Kenwyn Parish including more medieval castles, settlements, quays, barrows, churches and houses.

5.42 In this respect, Policy C3 'Boundaries' affirms that development should seek to preserve or enhance walls, hedges railings and other boundary structures and treatments and designated or non-designated heritage assets (including Truro Conservation Area, milestones and parish boundary markers) that contribute to the appearance of the streetscape or special character of the Neighbourhood Plan area. More broadly, Policy E7 'Character of the Highways and Byways' confirms that development affecting roads, streets, openings, lanes, bridges and pavements in the Neighbourhood Plan area should retain or reinstate historic paving and construction materials.

Land, Soil and Water Resources

- 5.43 In terms of the location of the best and most versatile (BMV) agricultural land, Natural England's provisional agricultural land quality dataset indicates that the Neighbourhood Plan area is predominantly covered by Grade 2 (very good) and Grade 3 (good to moderate) land. A detailed agricultural land classification (ALC) assessment has been completed around the city of Truro, with several areas of Grade 2 and Grade 3a identified. Therefore, development at these locations will result in the permanent loss of BMV agricultural land. Comparatively, a detailed ALC assessment has not been undertaken for most of Kenwyn parish. Nonetheless, it is noted in the predictive land quality assessment that the undeveloped areas of Kenwyn parish do have the potential for BMV agricultural land²⁰. Therefore, new development could potentially result in the permanent loss of BMV land at these locations, although this is uncertain in the absence of a detailed ALC assessment.
- 5.44 A key proposal supported by the Neighbourhood Plan is the Langarth development, which will take place on greenfield land. This includes Grade 2 and Grade 3a agricultural land, which has been classified as the BMV. In this respect development at this location will lead to the significant loss of productive agricultural land.
- 5.45 Otherwise, the Neighbourhood Plan takes a 'brownfield first' approach to development which promotes the utilisation of previously developed land in the first instance. For example, Policy H1 'Meeting Local Housing Need' and Policy H2 'Care Facilities' prioritises the redevelopment of previously developed land within the urban area of Truro or within the development boundary of Threemilestone or Shortlanesend. Policy EJ2 'Truro City Centre' encourages development proposals that reuse buildings or sites for residential uses. Policy EJ2(b) 'Pydar Street Redevelopment Site' encourages the regeneration of approximately 4ha of previously developed land within the city centre for mixed-use development. This will promote the efficient use of land in the Neighbourhood Area.
- 5.46 Policy E4(a) 'Development Quality' states that developments will be permitted where they would (amongst other considerations) reuse and redevelop existing buildings and materials found on site or won from demolition (where possible). This will minimise the levels of waste generated through the construction of new development areas. This is reaffirmed through the provisions of Policy E4(b) 'Building Quality' which seeks to ensure that new buildings achieve sufficient and convenient storage for waste and recycling. This will support the provisions of the NPPF and the Cornwall Local Plan which support a limitation of resource consumption within new development areas.
- 5.47 Concerning the protection of water resources in the Neighbourhood Plan area, the primary watercourses flowing through the Neighbourhood Plan are the River Kenwyn²¹ and River Allen²², with the latest water quality assessments completed in 2016 classifying the watercourses as having a 'good' and 'moderate' overall status, respectively. In this regard, Policy E2 'Sustainable Drainage' is supportive of proposals which incorporate water recycling facilities and sustainable urban drainage features that minimise the impact of the development on the drainage regime of the

²⁰ Natural England (2017): 'Likelihood of BMV Agricultural Land – Strategic Scale Map South West', [online] available to access via: <<http://publications.naturalengland.org.uk/publication/5624668800679936?category=5208993007403008>> last accessed [10/02/20]

²¹ Environment Agency (2019): 'Catchment Data Explorer – River Kenwyn', [online] available to access via: <<https://environment.data.gov.uk/catchment-planning/WaterBody/GB108048002340>> last accessed [10/02/20]

²² Environment Agency (2019): 'Catchment Data Explorer – River Allen', [online] available to access via: <<https://environment.data.gov.uk/catchment-planning/WaterBody/GB108048002330>> last accessed [10/02/20]

river catchment. The measures proposed through the policy seek to maximise the use of SuDS technology to decrease surface water run-off into watercourses, alongside minimising the use of impermeable materials and retaining green spaces. This is important in the local context as sewage discharge is one of the reasons for not achieving good status for the River Allen. Additionally, Policy E3 'Sewage Facilities' will support water quality by ensuring that adequate sewage treatment facilities are available or suitable arrangements can be made for their provision.

- 5.48 Highlighted within the Minerals Safeguarding Development Plan Document²³ and available to view on Cornwall Council's Interactive Mapping tool, Newham Quarry is a designated mineral safeguarding area (MSA) and is located within the south eastern section of Neighbourhood Plan area. In this regard, Policy EJ4 'Newham Employment Area' supports small scale extensions to the employment area providing the proposals would not sterilise the Quarry. Therefore, the proposals likely to come forward are unlikely to significantly impact the integrity of the minerals resources offered protection through the MSA.
- 5.49 Several policies also seek to protect key features of landscape and biodiversity interest and promote the green space and open space through comprehensive green infrastructure enhancements. While these policies do not specifically seek to address land, soil and water resources, the policies will indirectly help promote and protect these resources, including the promotion of high-quality green networks in the Neighbourhood Plan area and the protection and enhancement of key landscape features. This will help support the capacity of the landscape to regulate soil and water quality.

Population and Community

- 5.50 The Cornwall Local Plan provides a housing target of 5,100 dwellings for the Truro and Roseland Community Network Area (CNA). Specifically, 3,900 dwellings are to be provided in Truro and Threemilestone, with a further 1,200 residual dwellings delivered across the rest of the CNA during the plan period. The Site Allocations Development Plan Document (DPD) does not allocate any sites within Truro and Kenwyn and therefore, the Neighbourhood Plan takes an approach which seeks to deliver sustainable development which is sensitive to the environmental constraints present locally and which is intended to meet specific housing requirements or other community objectives. This will primarily include a new garden village at Langarth which is to be delivered via a masterplanning approach for several sites which have extant planning permissions (totalling 2,700 dwellings). Alongside, the intensification and regeneration of brownfield sites in Truro city centre will facilitate an intensification of uses at these locations, including new residential and employment areas. This is further discussed in Chapter 2 and Chapter 4 of the SA Report. In this respect, the Neighbourhood Plan has the potential to have significant positive effects in relation to the Population and Communities SA theme through delivering housing and infrastructure which meets local needs, and through supporting community and economic vitality.
- 5.51 For example, Policy E1 'Sustainable Development' states that new developments in Truro and Kenwyn will be approved where it can be demonstrated that the social, economic and environmental aspects of sustainable development have been

²³ Cornwall Council (2018): 'Minerals Safeguarding Development Plan Document', [online] available to access via: <<https://www.cornwall.gov.uk/mineralsdpd>> last accessed [17/07/19]

embodied within the proposal. Policy E4(a) 'Development Quality' recognises the value of securing high quality design and layouts through new development areas, supporting proposals which would meet the principles of 'Building for Life' standards. Policy H3 'Langarth' stipulates that the Masterplan for the garden village must demonstrate how the principles of sustainable development will be achieved across the site, including (but not limited to):

- The development of a series of coherent neighbourhoods, with a mix of uses, tenures and housing sizes, alongside a targeted and appropriate use of higher densities to create centres and hubs for public transport and community facilities across the site;
- Planning for the early implementation of key infrastructure including strategic movement routes, green infrastructure networks, schools and improved access and accessibility throughout and between the site and to services and facilities within neighbouring settlements; and
- Enabling opportunities through the layout and form of the development for co-created public spaces to be facilitated for and by the community.

5.52 There is an identified need during the Neighbourhood Plan period to provide for at least one new primary school to meet increased demand for school places arising from growth. In this regard, a site has been granted permission as part of the development masterplan for Langarth (see Policy H3). Education provision in the Neighbourhood Plan area will be further supported by Policy ED1 'School Site Allocation' through seeking to ensure that existing land used for educational requirements is not lost (except in exceptional circumstances) and that new development at locations reserved for new schools is only facilitated where necessary for the purposes of education or leisure.

5.53 The Neighbourhood Plan also seeks to support the delivery of high-quality design within housing, in addition to supporting the delivery of housing appropriate for local people through providing homes of a type and tenure to reflect local needs. This will respond to a need to improve the balance of the housing stock locally, and to meet the needs of an ageing population. Key policies in this regard include Policy H1 'Meeting Local Housing Need' which stipulates that developments of 10 or more dwellings must provide a minimum of 35% affordable housing and 5% self-build or custom build dwellings (where viable). The policy goes on to state that where on-site provision of affordable housing is not possible, development should make a financial contribution to off-site provision that is equivalent in value to on-site provision. Policy H2 'Care Facilities' also supports the development of extra care homes which meet a locally identified need.

5.54 Maintaining and enhancing the diversity of local community infrastructure is essential for the vitality of settlements, encouraging growth and meeting the needs of residents. Policy LC4 'Cultural and Community Centres, Services and Facilities' seeks to enhance the quality and accessibility of essential community infrastructure, improving existing facilities and providing suitable additional provision where required (in sustainable locations). The policy outlines that the loss or conversion of part of a community building for an alternate use will only be supported in exceptional circumstances.

5.55 Accessibility to services and facilities is also a key influence on the quality of life of residents and community cohesion. By integrating new development areas within the urban area of Truro and within the development boundaries of Threemilestone and Shortlanesend through the defined urban extent boundary (see Policy H1), this will ensure that new development areas are located within proximity to existing services, facilities and amenities. Accessibility is further facilitated through Neighbourhood Plan policies which encourage active and sustainable travel options and seek to integrate new development areas within existing footpaths, cycle paths and public transport networks. Key policies in this regard include Policy T1 'Transport Strategy Contributions' and Policy T3 'Sustainable Transport'.

5.56 As stated within the Cornwall Local Plan, town centres are to remain the focus for retail and community facilities in line with national policy. Proposals should support Truro's wider role as an economic and service centre. In this regard, Policies EJ2-EJ6 set out a series of provisions for improving the economic vitality of six employment areas taken forward through the Neighbourhood Plan. For example:

- Policy EJ2 'Truro City Centre' will encourage the vitality of Truro City Centre through promoting a well-balanced mix of uses and design which supports the high quality built environment and viability of the area. Proposals for change of use or redevelopment of ground floor accommodation in the primary shopping area will only be permitted where the proposal would add to the attractiveness of the centre and would not reduce the predominance of A1 use. This will safeguard and maintain the identity of the city centre as a commercial and retail core.
- Policy EJ2(b) 'Pydar Street Redevelopment Site' is identified as a key regeneration project within the city centre. In this respect, development of the site for a mix of uses will be supported subject to the development of a binding masterplan that identifies how the principles for regeneration for the built and natural environment (as stipulated within the policy) will be achieved.
- Policy EJ3 'The Port of Truro' promotes maritime and port-related uses at the Port of Truro, recognising the value of these historic employment sectors for the local economy.
- Policy EJ4 'Newham Employment Area' will help promote the vitality of Newham employment area through the redevelopment of the area for B1 (office) uses and high quality employment space, whilst seeking to ensure that maritime uses are not sterilised.
- Policies EJ5 'Treliske Employment Area' and EJ6 'Threemilestone Employment Area' seek to improve and expand employment opportunities at these locations.

5.57 These policies will therefore support the economic vitality of these areas through tailoring the relative strengths of each area and maximising their appeal. This will be supported by Policy EJ1 'Communities at Work', which supports these location-specific policies through setting out provisions which will help ensure that new and improved employment provision minimises effects on the built and natural environment and enhances the quality of life of residents. Policy E4(b) 'Building Quality' states that new development areas should provide ducting to buildings to allow for future technological needs, such as rapid electric charging points and ultrafast broadband. Furthermore, the provisions of Policy EJ7 'Employment Land Safeguarding' will ensure that these strategic employment sites are safeguarded for

employment use so that employment land remains available in close proximity to where people live.

Health and Wellbeing

- 5.58 Reflecting the outcomes of the Joint Strategic Needs Assessment (JSNA) for Cornwall, the 2017 health profile for the Truro and Roseland Community Network Area (CNA)²⁴ contains a variety of key statistics which help to build an understanding of the community needs. The findings indicate levels of inactivity amongst residents along with the prevalence of an ageing population. In this respect, the policies contained within the Neighbourhood Plan will bring a range of benefits for the health and wellbeing of residents within Truro and Kenwyn, as well as addressing some of the key statistics within the health profile.
- 5.59 With reference to the design of new development areas, Policy H1 'Meeting Local Housing Need' outlines that development comprising the redevelopment of open spaces or garden areas will not normally be permitted, unless it can be demonstrated that their loss would not result in visual or recreational detriment to the location or that sufficient space would be retained to mitigate their loss. Policy H3 'Langarth' stipulates that the Masterplan for the garden village must demonstrate how the principles of sustainable development will be achieved across the site, including (but not limited to):
- The provision of a mix of housing types, sizes and tenures to meet identified needs throughout the development area including key worker housing to help serve key employment in the location and extra care housing provision that is well connected to the community and facilities;
 - The creation of a wooded landscape across the site, extending where possible to create opportunities for a new woodland park beyond the site; and
 - The development of a planned and coherent network of multi-functional green infrastructure that retains and strengthens existing networks and corridors, delivers community growing spaces and edible landscapes.
- 5.60 Furthermore, Policy EJ2(b) 'Pydar Street Redevelopment Site' states that proposals for the regeneration of this area will be subject to a masterplan that enables the creation of a natural corridor of public space adjacent to the river, alongside facilitating opportunities for co-created public open space and appropriate community use building or spaces for and long-term stewardship of the site through engagement of the community. The Neighbourhood Plan's impetus on green infrastructure enhancements will therefore support the health and wellbeing of residents by facilitating improvements in levels of physical activity, enhancing social interaction between residents and promoting mental and emotional well-being.
- 5.61 Recognising the ageing population of the Neighbourhood Plan area, Policy H2 'Care Facilities' supports the development of extra care homes which meet a locally identified need providing they are in a location accessible by good quality and frequent public transport links and they provide capacity for community beds (amongst other considerations). Policy E4(a) 'Development Quality' also outlines that

²⁴ Cornwall Council (2017): 'Community Network Area Profile – Truro and Roseland', [online] available to access via: <https://www.cornwall.gov.uk/health-and-social-care/public-health-cornwall/joint-strategic-needs-assessment-jsna/community-and-health-based-profiles/community-network-health-profiles/> last accessed [10/02/20]

applications for development will be expected to provide secure and high quality design, alongside active, green and accessible layouts which enhance the quality of local spaces. Specifically, developments will be permitted where they provide (amongst other considerations) an acceptable level of amenity in terms of garden space and usable open spaces, alongside amenities and infrastructure that are suitable for multi-generational use and do not exclude on the basis of physical ability or age. The inclusion of flexible and adaptable buildings through new development areas is also encouraged through Policy E4(b) 'Building Quality', recognising the value of providing a good quality living environment that meets the day to day needs for all residents.

- 5.62 As discussed within the appraisal for the 'Landscape' SA theme, the Neighbourhood Plan has a strong focus on local distinctiveness and the protection and enhancement of townscape quality. This will positively contribute to the satisfaction of residents with their neighbourhoods as a place to live. Specifically, the focus on the protection, enhancement and creation of accessible open space and enhancements to green infrastructure networks through Policy E5 'Green Infrastructure' will support the quality of life of residents in the Neighbourhood Plan area through promoting health and wellbeing and encouraging active lifestyles. Improved green infrastructure provision will also encourage community cohesion and promote the vitality of neighbourhoods. This will be enhanced through Policy LC1 'Open Space Requirements', which set out requirements for the provision of open space to accompany new development, including the typologies of space to be provided; Policy LC2 'Local Protected Open Space', which protects open spaces identified by the Truro and Threemilestone Landscape Strategy as being of local importance for their public amenity value; and Policy LC3 'Protection of Formal Open Spaces and Playing Pitches', which identifies and seeks to protect formal or informal recreational or sports pitch facilities.
- 5.63 More broadly, the Neighbourhood Plan will support access to health, recreational and community facilities, with benefits for the quality of life and wellbeing of residents. A key policy in this regard is Policy LC4 'Cultural and Community Centres, Services and Facilities'. This will be supported by the policies' focus on the development of new and improved sustainable transport networks, including pedestrian, cycle and public transport links, achieved through the provisions of Policy T1 'Transport Strategy Contributions' and Policy T3 'Sustainable Transport'.

Transportation

- 5.64 Each Local Transport Authority in England and Wales has a statutory duty to produce, adopt and regularly review their Local Transport Plan (LTP) through the Local Transport Act 2000, as amended by the Local Transport Act 2008. In this regard, 'Connecting Cornwall 2030'²⁵ is the third Local Transport Plan (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 our transport system connecting people, communities, businesses and services in a way that is reliable, efficient, safe, inclusive and enjoyable'*.

²⁵ Cornwall Council (2011): 'Connecting Cornwall: 2030 Strategy', [online] available via: <<https://www.cornwall.gov.uk/transport-and-streets/transport-policy/local-transport-plan-connecting-cornwall-2030/>> last accessed [15/07/19]

- 5.65 The Neighbourhood Plan has a close focus on encouraging the use of sustainable modes of transport in Truro and Kenwyn. In this context Policy T1 'Truro Transport Strategy' seeks to ensure that contributions are secured to the schemes and proposals in the strategy from new development in the Neighbourhood Plan area (facilitated through Community Infrastructure Levy Section 106 contributions). This will help facilitate improvements to public transport and walking and cycling networks. Policy T1 will be supported by Policy T3 'Sustainable Transport', which seeks to promote development which is fully accessible by public transport, pedestrian and cycle routes. New sustainable transport provision will also be sought through the provisions of Policy T3. Sustainable transport use will also be promoted over the longer term by Policy T2 'Safeguarding Railway Land', which seeks to safeguard land at Truro Railway Station and the former Cattle Dock at Claremont Terrace and the immediate viaduct area for rail-related purposes. Specifically, non-rail related development will not be permitted on these sites unless it can be evidenced that the land will not be required for future rail usage.
- 5.66 Supporting modal shift, there is a need to ensure that developments have good accessibility to a range of services and facilities via a range of transportation options. This is encouraged through Policy H3 'Langarth which states that the Masterplan for the garden village must demonstrate how the principles of sustainable development will be achieved across the site. This includes the provision of a high quality and logical movement hierarchy, alongside the primary transport route (known as the Northern Access Road) which will provide a tree-lined thoroughfare designed for low traffic speeds, public transport and active travel routes, adequate parking provision, and connections to the city centre by bus, walking and cycling. This will ensure that new developments are situated in the most sustainable locations in terms of the relative distance to local centres, supporting the creation of inclusive communities and minimising the need to travel for undertaking day-to-day activities.
- 5.67 With reference to new development areas, Policy E4(a) 'Development Quality' highlights that proposals will be permitted where they would fully integrate sustainable transport modes (including bus services where the scale of development is appropriate) and active travel measures into the design. This is reinforced through Policy EJ1 'Communities at Work' which outlines support for new employment development which provides on and off site highways, pedestrian and other access improvements needed to integrate the development into the surrounding area. Furthermore, the clustering of economic activities at the six locations highlighted in the appraisal for the 'Population and Community' SA theme (Truro City Centre, Pydar Street Redevelopment Site, the Port of Truro, Newham Employment Area, Trelliske Employment Area and Threemilestone Employment Area) will promote accessibility to economic opportunities through 1) focussing economic activities at more accessible locations in the Neighbourhood Plan area and 2) supporting the appropriate provision of new transport infrastructure to serve key employment areas. Alongside the provisions of Policy T1 and T3, this will encourage the use of sustainable modes of transport.
- 5.68 In terms of congestion, key concerns include the number of commuter trips into the Truro each day which causes significant congestion on the key strategic routes into the city, including the A390 western corridor, the A39 and B3284. Policy T1 highlights support for a package of measures to reduce congestion and increase capacity of the transport network, with Policy T3 seeking to ensure that new development areas maximise accessibility by non-car transportation options. Therefore, these policies

will help support modal shift and tackle congestion and traffic issues experienced in Truro and Kenwyn.

Conclusions at this current stage

- 5.69 The assessment has concluded that the submission version of the Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'Population and Community' SA theme. This relates to the focus of the Neighbourhood Plan on facilitating the delivery of growth which meets local needs, supporting economic vitality by enhancing the prospects for employment within Truro city centre, and on safeguarding and enhancing community infrastructure. The Neighbourhood Plan will also bring significant positive effects in relation to the 'Health and Wellbeing' SA theme, linked to its promotion of improved and accessible network of open spaces, its focus on sustainable transport and the enhancement of townscape quality.
- 5.70 Additionally, the Neighbourhood Plan will bring positive effects in relation to the 'Biodiversity and Geodiversity' SA theme through delivering multi-functional green infrastructure corridors through new development areas, retaining habitats, enhancing ecological networks and delivering net gains. However, the Habitats Regulations Assessment conclusions highlight that some Neighbourhood Plan policies could benefit from additional wording in order to safeguard the integrity of European designated sites.
- 5.71 The Neighbourhood Plan is also likely to lead to positive effects in relation to the 'Landscape' and 'Historic Environment' SA themes. These benefits largely relate to the Neighbourhood Plan's emphasis on protecting and enhancing the sense of place and identity of Truro and Kenwyn, supporting the quality of the public realm and townscape, and through incorporating high-quality and sensitive design through new development proposals which positively respond to local distinctiveness. However, given the approaches taken forward through the Neighbourhood Plan will help limit potential effects from new development areas rather than secure significant enhancements, these impacts are less likely to comprise significant positive effects overall. In addition, given the significance of the Round 200m north west of Penventinnie, it is recommended that the Neighbourhood Plan incorporates additional specific provisions for protecting the setting and sense and place of this scheduled monument. These include as identified through the detailed heritage assessments undertaken as part of the Langarth planning applications.
- 5.72 Regarding the 'Climate Change' SA theme, the Neighbourhood Plan will potentially lead to positive effects through supporting development proposals which tackle flood risk issues, deliver renewable energy generating infrastructure and include low carbon energy sources to address the climate crisis. However, this is dependent on the extent to which development proposals incorporate these mitigation and adaptation measures through design. The Neighbourhood Plan will also initiate several beneficial approaches regarding the 'Transportation' SEA theme, given its focus on reducing traffic congestion, supporting a modal shift towards sustainable transport and by ensuring that new developments provide appropriate access to local services and facilities.
- 5.73 Likewise, the Neighbourhood Plan will also initiate several beneficial approaches for the 'Land, Soil and Water Resources' SA theme through the implementation of objectives which seek to limit pollution and improve the environmental quality of Truro and Kenwyn, and through (with the exception of Langarth) promoting a 'brownfield

first' approach for new development areas. However, the Langarth proposals will inevitably lead to significant effects on soils resources through facilitating growth which leads to the permanent loss of productive agricultural land.

6. Next Steps

- 6.1 This SA Report accompanies the Neighbourhood Plan for submission to the Local Planning Authority, Cornwall Council, for subsequent Independent Examination.
- 6.2 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Cornwall Local Plan.
- 6.3 If Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by Cornwall Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Truro and Kenwyn Neighbourhood Plan will become part of the development plan for the two parishes.

Appendix A Context Review and Baseline

A1 – Air Quality

Context review

The National Planning Policy Framework (NPPF) seeks to mitigate air quality impacts during development whilst simultaneously taking advantage of opportunities to improve air quality. Measures include, but are not limited to; sustainable transport solutions, limiting the need to travel, complying with relevant pollutant limits or national objectives and enhancing green infrastructure in strategic development. Smaller-scale development should consider the potential for cumulative effects in relation to air quality.

Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'²⁶ 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 *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.

Prepared in March 2017 (and updated in October 2018), the 'Clean Air for Cornwall Strategy: Incorporating the Cornwall Air Quality Action Plan' aims to²⁷:

- Raise awareness of air quality problems in Cornwall and provide an integrated approach to improving air quality;
- Reduce levels of pollution within Air Quality Management Areas (AQMAs) to below objective levels and improve the air quality in Cornwall as a whole;
- Raise awareness of the links between health and travel, in respect to both air quality, and personal fitness;

²⁶ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [accessed 20/02/19]

²⁷ Cornwall Council (2018): 'Clean Air for Cornwall Strategy: Incorporating the Cornwall Air Quality Action Plan', [online] available to access via: <<https://www.cornwall.gov.uk/environment-and-planning/environmental-protection/environmental-protection-air-quality/clean-air-for-cornwall-strategy/>> last accessed [10/03/19]

- Raise awareness and provide policy, guidance, and a framework for development and impact mitigation to those wishing to develop in Cornwall;
- Provide an approach for reducing emissions of fine particulates (PM2.5) in order to 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.

Summary of current baseline

Cornwall Council is required to monitor air quality across the district under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO₂), sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as AQMAs and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.

The main input to air pollutants in the Neighbourhood Plan area is road traffic. Monitoring of nitrogen dioxide (NO₂) from vehicles has been undertaken in Truro for several years. Over the last few years, increases in NO₂ at Highertown (on the western side of the city) have indicated significant exceedances of the NO₂ annual mean and 1 hour mean. However, further studies had indicated that the annual mean objective was likely to be met at the nearest sensitive receptors as they are set back from the road. However, the monitoring results for 2012 indicate that levels of NO₂ increased and plans for significant future development within Truro, and in particular on the western side of the city, is a cause for concern for Cornwall Council. The results of the 2012 monitoring also indicated that the annual mean objective may now be being breached at some of the properties where this was previously not thought to be the case. As a result, an Air Quality Management Area has been declared for Truro.

Appendix 9 within the Clean Air for Cornwall Strategy states that since Truro was declared as an AQMA in 2015, Neighbourhoods and Public Protection has worked with colleagues in Strategic Transportation to develop the Air Quality Action Plan measures. Many of the measures form part of the Truro Transport Strategy and this has been supplemented by other measures specifically targeted at improving air quality.

Future baseline

New housing and employment provision in the plan area has the potential to have adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as nitrogen dioxide. Areas of particular sensitivity to increased traffic flows are likely to be within the more congested parts of the Neighbourhood Plan area and the routes with highest traffic flows, especially on the western side of Truro at Highertown and Tresawls Road.

This may be offset in part by factors such as measures implemented through the Connecting Cornwall: 2030 Strategy (Local Transport Plan 3) to encourage modal shift from the private car and the improved fuel economy and efficiency of vehicles.

A2 – Biodiversity

Context review

At the European level, the EU Biodiversity Strategy²⁸ 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*’.

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.’
- planning policies and decisions should protect and enhance soils and sites of biodiversity and/or geological value. Plans should also identify, map and safeguard components of wider ecological networks; promote the conservation, restoration and enhancement of priority habitats and species and pursue opportunities to secure net gains in biodiversity. The NPPF states if substantial harm to biodiversity through development cannot be avoided, adequately mitigated or compensated, then planning permission should be refused.
- The NPPF also supports the establishment and enhancement of habitat networks and green infrastructure at both the landscape and catchment scales, allowing for more resilience to current and future pressures. Trees make an important contribution to the character and quality of urban environments and can assist in climate change mitigation and adaptation strategies. Planning policies and decisions should ensure new streets are tree-lined and opportunities are taken to incorporate trees elsewhere in development.

The 25 Year Environment Plan places importance on improvements to the natural environment; aiming to achieve clean air and water, a reduced environmental hazard risk, a thriving plant and wildlife network, sustainable resource use and the enhancement of the natural environment. This will be accomplished through sustainable land management, engagement in nature recovery, connecting people to the environment, increased resource efficiency and the protection and improvement of land, sea and ocean.

The Environment Act 2021 makes provision for biodiversity gain to be a condition of planning permission in England, in addition to biodiversity gain site registers and biodiversity credits. The Act recognises there is a duty to conserve and enhance biodiversity, by identifying priorities for an area using biodiversity reports and local nature recovery strategies. Local nature recovery strategies will identify biodiversity priorities for the strategy area as well as a local habitat map. Furthermore, habitat maps are expected to include recovery and enhancement areas which are or could become of importance for biodiversity.

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 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.

²⁸ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf> last accessed [27/06/18]

Additionally, The Cornwall Biodiversity Action Plan²⁹ 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
- 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 '*Volume 4: Priority Habitats*' will contain the revised list for Cornwall.

Summary of current baseline

Statutory Designations

Two Special Areas of Conservation (SAC) and three Sites of Special Scientific Interest (SSSI) are located within or border the Truro and Kenwyn Neighbourhood Plan area. These are:

- Fal and Helford SAC;
- Carrine Common SAC (located immediately south of the plan area);
- Malpas Estuary SSSI;
- Carrick Heaths SSSI; and
- Carrine Common and Penwethers SSSI.

²⁹ Cornwall Council (2017): 'Biodiversity and Geological Conservation', [online] Available at: <<https://www.cornwall.gov.uk/environment-and-planning/biodiversity-and-geological-conservation/?page=12898>> last accessed [03/02/17]

The Fal and Helford SAC, which is located within the boundary of the parish of Truro, has been designated primarily for a number of Annex 1 habitats. These include:

- 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; and
- Atlantic salt meadows (*Glauco-Puccinellietalia maritima*).

Other Annex 1 Habitats which also exist within the site but which are not a primary reason for site selection are:

- Estuaries; and
- Reefs.

There is one Annex 2 species which is a primary reason for the designation: Shore dock *Rumex rupestris*³⁰.

The Carrine Common SAC is located on the southern boundary of Kenwyn Parish and has been designated primarily for the Annex 1 habitat, 'Temperate Atlantic wet heaths with *Erica ciliaris* and *Erica tetralix*'. The site is also known to have the 'European dry heaths' Annex 1 Habitat. Whilst this is a qualifying reason for site selection, it is not a primary reason for its selection³¹.

The full citations for the Malpas Estuary SSSI, Carrick Heaths SSSI and Carrine Common and Penwethers SSSI are presented in Box A2.1, Box A2.2 and Box A2.3 below.



<http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?euocode=UK0012795> (accessed 09/10/2014)

Box A2.1: Description of the Malpas SSSI

This estuarine site extends across Lambe Creek, Calenick Creek and the Truro River at the northwestern limits of the Fal Estuary complex. The major habitat feature of the site is tidal mudflats which are feeding grounds for wildfowl and wading birds, including nationally important numbers of a rare wader. The site also includes saltmarsh, adjoining ancient semi-natural woodland and a heronry.

The site is primarily important for wildfowl and wading birds. The Truro River section regularly supports nationally important numbers of Black-tailed Godwit *Limosa* during autumn and winter. The site is also used for feeding by up to 500 Dunlin *Calidris alpina*, 200 Shelduck *Tadorna*, 300 Teal *Anas crecca*, and smaller numbers of other waders including Redshank *Tringa totanus*, Greenshank *T. nebularia*, Curlew *Numenius arquata*, Whimbrel *N. phaeopus* and Oystercatcher *Haematopus ostralegus*. The use which birds make of the different parts of the site and its relationship to feeding areas in other parts of the Fal complex of estuaries, varies with time of year, weather and tide.

Relatively undisturbed agriculturally improved pastureland to the south of Calenick Creek outside the site, is used by roosting waders during high spring tides.

Saltmarsh communities have developed in a number of localities within the site, most notably at Calenick Creek where species within the turf include Reflexed Saltmarsh-grass *Puccinellia distans* subsp. *distans*, Sea Couch *Elymus pycnanthus*, Sea Aster *tripolium*, Sea Arrow-grass *Triglochin maritima*, Sea Club-rush *Scirpus maritimus* and Sea Rush *Juncus maritimus*.

At Calenick Creek the saltmarsh is immediately continuous with a semi-natural ancient wood, dominated by coppiced Sessile Oak *Quercus petraea*, showing a classic transition from estuarine to woodland communities. Within the wood is an understorey of Holly *Ilex aquifolia* and Hazel *Corylus avellana*. The ground flora is typically dominated by Bramble *Rubus fruticosus* agg., Honeysuckle *Lonicera periclymenum* and, where slopes permit an increase in soil-depth and fertility, there are stands of Bluebell *Hyacinthoides non-scripta*. Three other small ancient semi-natural woodlands abut the estuary. These are similar in character to Calenick Wood but variations in exposure and past management result in wide variations in the abundance of shrub and herb species, notably Holly and Greater Woodrush *Luzula sylvatica*. The latter dominates large areas of Penpol Wood.

A heronry at Kea Wood, one of the three largest heronries in Cornwall, contains about 13 nests, and Herons *Ardea cinerea* regularly feed along the estuary.

Box A2.2: Description of the Carrick Heaths SSSI³²

The Carrick Heaths comprise of ten sites, all situated within a 12 km radius of Truro. The underlying soils at each site are largely derived from slatey mudstones, siltstones and shales which have given rise to clay soils with variable drainage regimes. These conditions have led to the development of mosaics of wet and dry heathland vegetation types, characterised by populations of Dorset heath *Erica ciliaris*, a nationally rare plant species and a prime constituent of Southern Atlantic Wet Heath, an internationally important vegetation type.

Other noteworthy species recorded include the nationally scarce yellow centaury *Cicendia filiformis* and Cornish moneywort *Sibthorpia europaea*. Royal fern *Osmunda*

³² Natural England (2014) Carrick Heaths SSSI [online] available at: http://www.sssi.naturalengland.org.uk/citation/citation_photo/2000368.pdf (accessed 08/10/14)

regalis, the rare hybrid *Erica* 3 *watsonii* and upright hedge bedstraw *Galium album* are also all of note.

Nationally scarce moss and liverwort species respectively include *Brachythecium ildaenum* and *Calliergon sarmentosum*. Areas of heath are characterised by purple moor-grass *Molinia caerulea* tussocks. The main associates are black bog-rush *Schoenus nigricans* and Dorset heath, with some cross-leaved heath *Erica tetralix* also present. The wettest areas are often characterised by abundant bog moss *Sphagnum* species, frequent sedges such as green-ribbed sedge *Carex binervis*, common yellow-sedge *C. demissa* and carnation sedge *C. panicea* and rushes such as soft rush *Juncus effusus* and sharp flowered rush *J. acutiflorus*.

The rushes and the purple moor-grass form low hummocks which support many other wetland herbs such as devil's-bit scabious *Succisa pratensis*, water mint *Mentha aquatica*, bog asphodel *Narthecium ossifragum*, common cottongrass *Eriophorum angustifolium*, greater bird's-foot

trefoil *Lotus pedunculatus*, marsh thistle *Cirsium palustre* and cuckoo flower *Cardamine pratensis*. Of particular interest are common sundew *Drosera rotundifolia*, hay-scented buckler-fern *Dryopteris aemula*, occasional stands of bog myrtle *Myrica gale* and creeping willow *Salix repens* and broad-leaved cottongrass *Eriophorum angustifolium* var. *elatius*. Bog pondweed *Potamogeton polygonifolius* and marsh pennywort *Hydrocotyle vulgaris* are locally abundant in waterlogged runnels between the hummocks along with lesser spearwort *Ranunculus flammula*, marsh St John's-wort *Hypericum elodes* and bog pimpernel *Anagallis tenella*. Other herbs and grasses recorded include lousewort *Pedicularis sylvatica*, heath spotted-orchid *Dactylorhiza maculata*, saw-wort *Serratula tinctoria*, common milkwort *Polygala vulgaris*, tormentil *Potentilla erecta*, and bristle bent *Agrostis curtisii*. Species more typical of damp grassland include common fleabane *Pulicaria dysenterica*, tufted vetch *Vicia cracca*, selfheal *Prunella vulgaris* and yellow bartsia *Parentucellia viscosa*.

In drier areas, bell heather *Erica cinerea* and western gorse *Ulex gallii* are often co-dominant, in some areas with cross-leaved heath *Erica tetralix* and in others with heather *Calluna vulgaris*. Dorset heath can also be found in these areas, but is more abundant on the wetter soils. Overall habitat and species diversity are increased by further areas of adjoining rush pasture, oak *Quercus* spp. woodland, streams and willow *Salix* spp. carr. However, grey willow *Salix cinerea*, birch *Betula pendula*, gorse *Ulex europaeus*, bramble *Rubus fruticosus* agg. and bracken *Pteridium aquilinum* are encroaching on heathland in places and need to be contained.

The Carrick Heaths also support a range of characteristic fauna. Invertebrate interest includes the nationally scarce pearl-bordered fritillary *Boloria euphrosyne* and the uncommon moth *Pammene obscurana* as well as two locally important species of dragonfly and the emperor dragonfly *Anax imperator* and the broad-bodied chaser *Libellula depressa*. A range of bird species have also been recorded including willow warbler *Phylloscopus trochilus*, chiffchaff *P. collybita*, snipe *Gallinago*, woodcock *Scolopax rusticola*, mallard *Anas platyrhynchos*, teal *Anas crecca*, garganey *A. querquedula*, shoveller *Anas clypeata* and coot *Fulica atra*.

The Red Data Book listed barn owl *Tyto alba* has also been recorded from Penstraze Moor.

Box A2.3: Description of the Carrine Common and Penwethers SSSI³³

Carrine Common and Penwethers is situated approximately 1.5 km south west of Truro. The site is underlain by Devonian slates and sandstones of the Mylor Series. Well-drained shallow Brown Earths underlie the dry heath and drier meadows. Lower lying mire vegetation has developed over waterlogged cambic stagnogley soils, often displaying a wet, peaty surface horizon. Alluvial deposits occur along the stream valleys. The site supports a variety of habitats, ranging from western lowland heath, scrub and mesotrophic, herb-rich hay meadows on drier slopes, to low-lying areas with impeded drainage, which support wet heath, Willow carr, streamside and mire vegetation. Carrine Common supports dry dwarf shrub heath, dominated by Heather *Calluna vulgaris*, Bell Heather *Erica cinerea*, Western Gorse *Ulex gallii* and Bristle Bent *Agrostis curtisii*.

The nationally rare plant, Dorset Heath *Erica ciliaris*, is locally dominant in the southeast of the Common. This is the largest population of Dorset Heath in Cornwall, and is unusual in that it occurs here in dry rather than wet heath.

Other plant species of note within the heathland include the hybrid heath *Erica x watsonii*, Pale Dog-violet *Viola lacteal*, a sub-species of the Common Violet, *Viola riviniana* spp. *minor*, and the endemic Bramble species, *Rubus daveyi*, *R. dumnoniensis*, *R. rilstone* and *R. cornubiensis*.

A series of herb-rich hay meadows lie immediately east of the common, forming the most extensive unimproved mesotrophic grassland known in Cornwall. The species rich sward supports over 50 plants species, with abundant Sweet Vernal-grass *Anthoxanthum odoratum*, Crested Dog's tail *Cynosurus cristatus*, Common Bent *Agrostis capillaris*, Heath-grass *Danthonia decumbens* and Common Knapweed *Centaurea nigra*, together with Yellow Rattle *Rhinanthus minor*, Southern Marsh-orchid *Dactylorhiza praeternissa*, Great Bird's-foot-trefoil *Lotus uliginosus*, Lousewort *Pedicularis sylvatica* and the nationally scarce Yellow Bartsia *Parentucellia viscosa*.

The adjacent hedgerows support a rich variety of shrub species, including the nationally rare Plymouth pear *Pyrus cordata*, which occurs at several locations within the main site and in hedgerows to the east. This is the second British location for this species, recently discovered here, completely separate from the Devon population. The lower-lying meadows support a variety of wetland habitat types including fen-type meadows, wet-heath/bog, and mire communities. More base-rich heath/bog communities are dominated by Purple Moor-grass *Molinia caerulea*, and Black Bog-rush *Schoenus nigricans*; together with a rich wetland flora including Dorset Heath, Bog Asphodel *Narthecium ossifragum*, Bog Pimpernel *Anagallis tenella*, Round-leaved Sundew *Drosera rotundifolia*, Marsh Lousewort *Pedicularis palustris*, Devil's-bit Scabious *Succisa pratensis* and Bogbean *Menyanthes trifoliata*. Royal Fern *Osmunda regalis* is locally abundant.

The lowest lying, permanently water-logged meadows support mire communities largely dominated by Purple Moor-grass, together with abundant Tormentil *Potentilla erecta*, Sharp-flowered Rush *Juncus acutiflorus*, Meadowsweet *Filipendula ulmaria*, Wild Angelica *sylvestris*, Hemp-agrimony *Eupatorium cannabinum* and *Sphagnum* bog mosses. The rich sedge flora includes Star Sedge *Carex echinata* and Tawny Sedge *Carex hostiana*. Bog-myrtle *Myrica gale* is locally dominant. An additional species of particular note is the nationally scarce plant species, Wavy-leaved St. John's wort

³³ Natural England (2014) Carrine Common and Penwethers SSSI [online] available at: http://www.sssi.naturalengland.org.uk/citation/citation_photo/1002937.pdf (accessed 08/10/14)

Hypericum undulatum. The uncommon Oblong-leaved Sundew *Drosera intermedia* and Pale Butterwort *Pinguicula lusitanica* also occur here.

The condition of each SSSI is summarized in the following Table A2.1, A2.2 and A2.3³⁴:

Table A2.1: Malpas SSSI condition summary

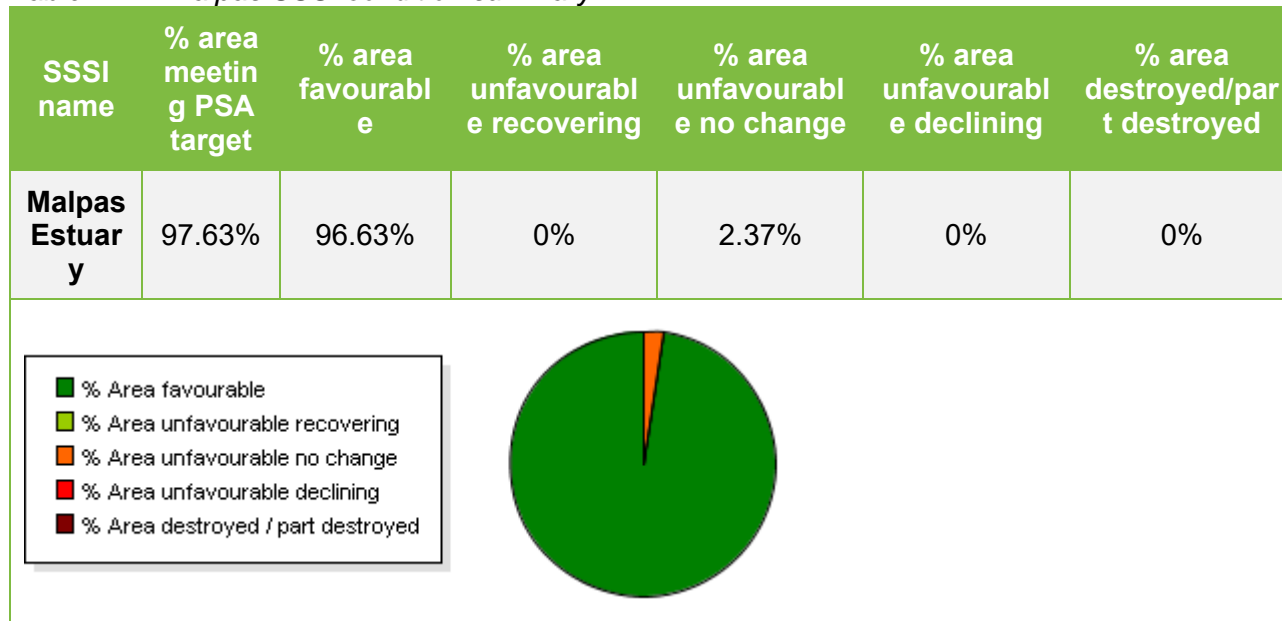
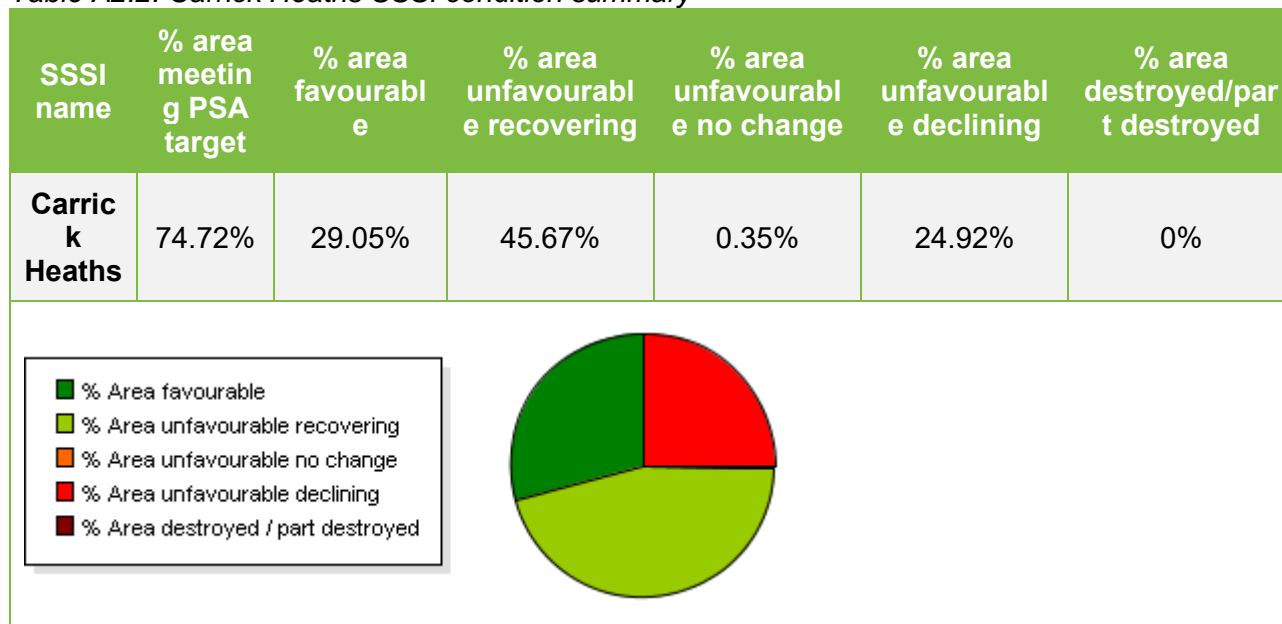


Table A2.2: Carrick Heaths SSSI condition summary



³⁴ Information in tables from: Natural England (2014) *Condition of SSSIs* [online] available at:
<http://www.sssi.naturalengland.org.uk/special/sssi/reportAction.cfm?report=sdt18&category=S&reference=1004029>
<http://www.sssi.naturalengland.org.uk/special/sssi/reportAction.cfm?report=sdt18&category=S&reference=2000368>
<http://www.sssi.naturalengland.org.uk/special/sssi/reportAction.cfm?report=sdt18&category=S&reference=1002937>
 (accessed 09/10/14)

Table A2.3: Carrine Common and Penwethers SSSI condition summary

SSSI name	% area meeting PSA target	% area favourable	% area unfavourable recovering	% area unfavourable no change	% area unfavourable declining	% area destroyed/part destroyed
Carrine Common and Penwethers	59.32%	35.93%	23.39%	40.68%	0%	0%

% Area favourable
 % Area unfavourable recovering
 % Area unfavourable no change
 % Area unfavourable declining
 % Area destroyed / part destroyed

Local designations

County Wildlife Sites comprise significant areas of semi-natural habitat in Cornwall outside statutory protected sites such as Sites of Special Scientific Interest (SSSIs) and Special Areas of Conservation (SACs). As illustrated in the map earlier in this section, there are three County Wildlife Sites located in Kenwyn Parish and three on the outskirts of Truro Parish.

Habitats and species

Cornwall's *Biodiversity: Volume 4* identifies several key habitats and species within the Truro-Development Growth Point. These are listed below:

Key BAP Habitats:

- Hedgerows
- Lowland Mixed Deciduous Woodland
- Wet Woodland
- Wood-Pasture and Parkland
- Lowland Fens

Key BAP species:

- Bats
- Otters
- Hedgehog
- Dormouse
- House sparrow

- Slow worm
- Grass snake
- Adder
- Invertebrates

The location of BAP Priority Habitats in the plan area are highlighted in the map included earlier in this section.

Future baseline

Sites of biodiversity importance have the potential to come under increasing pressures from an increase in the Neighbourhood Plan area's population and associated development. This includes through a loss of habitats and impacts on sites of biodiversity importance. This may be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of habitats and species. This may lead to changes to the composition and character of habitats and species within the SACs and SSSIs present in and around the plan area.

A3 – Climate Change

Context review

The TKNP will need to conform to the principles set out in the NPPF, including adopting a proactive planning approach to both mitigate and adapt to climate change. Planning policies are expected to improve the resilience of communities and infrastructure to climate change impacts, avoid inappropriate development in the flood plain zone and support the move to a low carbon economy. The NPPF recognises the potential for planning to shape places to better contribute to reductions in greenhouse gas emissions and deliver long-term resilience, including through reuse, regeneration and conversion.

The Clean Growth Strategy, Clean Air Strategy, the 25 Year Environment Plan and the Net Zero Strategy are a collection of documents seeking to progress the government's commitment to becoming net zero by 2050 under the UK Climate Change Act 2008. The documents outline how the government will tackle air pollution sources whilst maintaining an affordable energy supply and increasing economic growth. This parallels with the 25 Year Environment Plan, which seeks to manage land resources sustainably, recover and reinstate nature, protect soils and habitats, increase resource efficiency, improve water quality and connect people with the environment. The documents also interlink with the government's commitment to decarbonising transport. The decarbonisation plan recognises the need to undertake action to adapt the transport sector and increase resilience to climate change risks; this challenge is more directly addressed through the UK's National Adaptation Programme.

The Flood and Water Management Act³⁵ 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);

³⁵ Flood and Water Management Act (2010) [online] available at: <<http://www.legislation.gov.uk/ukpga/2010/29/contents>> last accessed [19/09/18]

- 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;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems (SuDS).³⁶

Further guidance is provided in the document 'Planning for SuDS'.³⁷ 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 relate 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

Summary of current baseline

Contribution to Climate Change

In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change 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%).³⁸

Potential 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) team³⁹. 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.

³⁶ 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.

³⁷ CIRIA (2010) 'Planning for SuDs – making it happen' [online] available to access via http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx last accessed [19/09/18]

³⁸ Department of Energy and Climate Change (2018) 2005 to 2016 UK local and regional CO2 emissions – data tables [online] available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016> [accessed 04/03/19]

³⁹ The data was released on 26th November 2018: See: <http://ukclimateprojections.metoffice.gov.uk/> last accessed [14/01/19]

As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile) for South West England during the period 2040-2059 compared to the period 1981-2000 are likely to be as follows⁴⁰:

- The central estimate of increase in annual mean temperatures of between 2°C and 3°C; and
- The central estimate of change in annual mean precipitation of +10 to +20% in winter and -20% to -30% in summer.

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

- Increased incidence of heat related illnesses and deaths during the summer;
- Increased incidence of illnesses and deaths related to exposure to sunlight (e.g. skin cancer, cataracts);
- Increased incidence of pathogen related diseases (e.g. legionella and salmonella);
- Increase in health problems related to rise in local ozone levels during summer;
- Increased risk of injuries and deaths due to increased number of storm events;
- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- 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;
- Changes in insurance provisions for flood damage;
- 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;
- Deterioration in working conditions due to increased temperatures;
- Changes to global supply chain;
- Increased difficulty of food preparation, handling and storage due to higher temperatures;
- An increased move by the insurance industry towards a more risk-based approach to insurance underwriting, leading to higher cost premiums for business;
- 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

⁴⁰ Met Office (2018): 'Land Projection Maps: Probabilistic Projections', [online map] available to access via: <https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps> last accessed [17/01/19]

- Flooding of roads.

Flood Risk

The areas at highest risk of flooding in the Neighbourhood Plan area are those near the River Allen and its tributaries which are in Flood Zone 3. Flood Zone 3 is of a high probability of flooding; representing that there is a 1% (1 in 100) or greater chance of flooding happening each year.⁴¹

Surface water flooding is risk for some parts of the Neighbourhood Plan area, with sections of medium-high risk predominantly located around the River Allen and its tributaries.⁴²

Future baseline

Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area, with increases in mean summer and winter temperatures, increases in mean precipitation and flooding in winter and decreases in mean precipitation in summer. This is likely to increase the risks associated with climate change with an increased need for resilience and adaptation.

In terms of climate change mitigation, per capita emissions are likely to continue to decrease as energy efficiency measures, renewable energy production and new technologies become more widely adopted. Proportionally road transport has the potential to become an increasing contributor to greenhouse gas emissions in the area.

A4 – Landscape

Context review

The NPPF gives great weight to conserving and enhancing protected landscapes, landscape character and scenic beauty. The scale and extent of development within these areas should be limited and development within their setting should be mindfully located and designed to avoid/minimise adverse impacts on the designated areas.

The NPPF also recognises the role of green infrastructure in landscape settings in addition to designated biodiversity sites, habitats, woodland, historic features, agricultural land and cultural landscapes. The positive contribution that land remediation can have on despoiled, degraded, derelict, contaminated and unstable land is also recognised.

The Cornwall AONB Management Plan 2016-2021⁴³ sets out the following 20 year vision for the AONB:

“The status of the Cornwall AONB as a nationally and internationally important protected landscape, with equal status and protection to that of a National Park, is recognised by all.

The landscape characteristics that combine to give the Cornwall AONB its natural beauty, unique identity and sense of place are fully understood. The AONB landscape is conserved and enhanced at every opportunity through effective partnership working; achieving environmental growth, reversing losses of natural capital, biodiversity and

⁴¹ GOV UK (2019): ‘Flood Map for Planning’, [online] available at: <<https://flood-map-for-planning.service.gov.uk/>> [accessed 19/02/19]

⁴² GOV UK (2017): ‘Long term flood risk assessment for locations in England’, [online] available to access from: <<https://flood-warning-information.service.gov.uk/long-term-flood-risk/>> [accessed 04/03/19]

⁴³ Cornwall AONB (2016) The Cornwall AONB Management Plan 2016-2021 [online] available at: <<https://www.cornwall-aonb.gov.uk/management-plan>>

heritage and improving resilience to climate change. A landscape that is accessible and appreciated by everyone.

Communities and businesses in Cornwall are underpinned by a protected landscape that provides prosperity, good health and a high quality of life. They understand the value of the Cornwall AONB and take advantage of the opportunities it provides, while reinvesting in the landscape in order to sustain these benefits long term.”

More specifically, the Cornwall AONB Management Plan 2016-2021 identifies the following aims:

- Cultivating character: The character and local distinctiveness of the Cornwall AONB is conserved and enhanced through appropriate plans, strategies and policies and through project activity.
- Managing development: Well-implemented planning policies and guidance that protect and enhance the landscape character and natural beauty of the AONB, while meeting the needs of local communities.
- Investing in nature: The principle of ‘environmental growth’ is embedded within decision making in Cornwall and a step change is taken to invest in natural capital, taking an ecosystems approach to conserve and enhance natural resources and reverse current declines in habitats and species within the AONB.
- Responding to climate change: AONB communities are able to plan for climate change through an improved understanding of likely impacts and the landscape is better managed to enable adaptation to the effects of climate change.
- Nurturing heritage: There is improved understanding and interpretation of the historic character and heritage assets within the Cornwall AONB and those features identified as ‘at risk’ or declining condition will be brought back into better management.
- Revitalising access: A well-maintained and better connected public rights of way and transport system, supported by adequate investment that is able to respond to management pressures and which meets the needs of local people and visitors to the AONB, particularly around the coast.
- Vibrant communities: Effective demonstration that people’s needs can be met fully, in sustainable ways that can enhance natural beauty, particularly how affordable housing can be accommodated through a good understanding of landscape capacity and high quality design.
- Health and happiness: Increased use of the AONB landscape to improve levels of physical and mental health and prevent ill health via outdoor physical activity and volunteering, increasing skills and confidence and decreasing health inequalities and isolation.
- Inspiring culture: Greater awareness, promotion and celebration of the culture of the AONB as an integral part of the protected landscape and a better understanding of its economic and social value.
- Promoting prosperity: To ensure the Cornwall AONB is a natural place for growth through:
 - Increased emphasis on and development of sustainable local economies.
 - Improved support for AONB businesses e.g. planning support, funding and marketing advice.

- Better promotion of the Cornwall AONB and use of the protected landscape as a marketing tool, to achieve a higher value product and improve competitiveness.
- Increased social and capital investment in the protected landscape.

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 policies listed within the document, the following directly relate to the Landscape and Historic Environment.

- Policy 23: Natural environment;
- Policy 24: Historic environment; and
- Policy 25: Green infrastructure.

Summary of current baseline

Cornwall AONB

The Cornwall Area of Outstanding Natural Beauty (AONB) is located on the south-eastern border of the plan area. This part of the Cornwall AONB is called the South Coast Central Section, which includes the Fal Ria. The area is described in the AONB Management Plan as:

“The main channel is formed where the River Fal meets the open seas, this stretch of water is known as the Carrick Roads. It is broad and deep providing shelter in its deep water harbour for ocean going vessels. The mouth of the estuary is flanked by the historic landmarks of St Mawes Castle to the east and Pendennis Castle to the west (outside the AONB) - both important strategic fortifications guarding the Carrick Roads since the time of Henry VIII. The ria system of the Fal is more extensive with larger and more sinuous creeks than seen on the Helford and extends up to Truro at Malpas and Calenick.”

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 its character. Both Kenwyn and Truro parish sit within the Cornish Killas National Character Area (National Character Area 152). The NCA is broad but provides some context to the character of the Neighbourhood Plan area, with the following characteristics from the NCA profile⁴⁴ particularly relevant:

- An undulating shillet (shale) plateau, with open vistas and a characteristic network of stone faces earthen banks (Cornish hedgebanks), many enclosing fields in use since medieval times;
- Broadleaved woodland valleys, dominated by internationally important western oak woodland habitat, which dissect the plateau and lead to the south coast;
- Important industrial archaeological sites, including hard rock mining with its distinctive engine houses and quarrying sites, some of which form part of the Cornwall and West Devon Mining Landscape WHS; and

⁴⁴ Natural England (2014): ‘NCA Profile 152: Cornish Killas’, [online] available at: <<http://publications.naturalengland.org.uk/publication/6654414139949056>> last accessed [31/01/20]

- A dispersed settlement pattern of hamlets, farmsteads, historic mining villages, often formed of simple, austere buildings, with nonconformist chapels and wayside crosses, and located where steeply incised valleys meet the coast.

Local Landscape Character

At the local level, the Cornwall LCA describes the variations in character between different areas and types of landscape in the county. It provides an evidence base for local development frameworks and plans, articulating what people perceive as distinctive and special about all landscapes in Cornwall. Additionally, it also sets out strategies and guidelines for the protection, management and planning of the landscape. The following LCAs cover the Neighbourhood Plan area, as viewed on the Cornwall Interactive Mapping Tool⁴⁵:

- LCA CA13: Fal Ria, Truro and Falmouth (majority of Truro parish and the centre of Kenwyn parish);
- LCA CA11: Redruth, Camborne and Gwennap (southern part of Kenwyn parish); and
- LCA CA14: Newlyn Downs (northern part of Kenwyn parish).

Summary of future baseline

New development has the potential to lead to incremental but small changes in landscape and villagescape character and quality in and around the Neighbourhood Plan area. This includes from the loss of landscape features and areas with an important visual amenity value.

In the absence of the plan, inappropriate levels of development within the open countryside could negatively impact upon the landscape features which contribute to the distinctive character of the LCAs which define the Neighbourhood Plan area, along with the outstanding universal value of the World Heritage Site and the special qualities of the AONB which borders the Neighbourhood Plan area.

A5 – Historic Environment

Context review

The vision contained within the most recently available Cornwall and West Devon Mining Landscape World Heritage Site Management Plan (2013-2018)⁴⁶ 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 of 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;

⁴⁵ Cornwall Council (2019): 'Interactive Mapping' [online] available to access via: <<https://www.cornwall.gov.uk/community-and-living/mapping/?page=17724&page=17724>> last accessed [10/03/19]

⁴⁶ Cornwall Council (2013): 'World Heritage Management Plan', [online] available to download from: <<https://www.cornwall.gov.uk/environment-and-planning/conservation/world-heritage-site/>> last accessed [10/03/19]

- 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 Document⁴⁷ was prepared for the World Heritage Site in May 2017 and 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 Supplementary Planning Document 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 NPPF seeks to conserve and enhance historic environment assets in a way that compliments and works with their significance. The NPPF pursues planning policies and decisions that are understanding to local character and history without preventing or discouraging appropriate innovation and change. The NPPF supports the use of area-based character assessments, design guides and codes and masterplans to help ensure that land is used efficiently while also creating beautiful and sustainable places.

The NPPF indicates proposed plans should ensure the design of streets, parking areas and other transport elements reflect current national guidance including the National Design Guide and the National Model Design Code. Design Codes are able to set out a necessary level of detail in sensitive locations. In the case of the historic environment, they can indicate specific ways to maintain local character.

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 Landscape and Historic Environment SEA theme.

The Government's Statement on the Historic Environment for England⁴⁸ 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.

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

⁴⁷ Cornwall Council (2017): Cornwall and West Devon Mining Landscape World Heritage Site Supplementary Planning Document', [online] available to download via: <<https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/cornwall-and-west-devon-mining-landscape-world-heritage-site-supplementary-planning-document/>> last accessed [10/03/19]

⁴⁸ HM Government (2010) The Government's Statement on the Historic Environment for England [online] available at: <http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference_library/publications/6763.aspx> last accessed [20/0918]

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 (February 2016)⁴⁹ 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
- 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)⁵⁰ 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)⁵¹ 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)⁵² outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant 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.

⁴⁹ Historic England (2016): 'Conservation Area Designation, Appraisal and Management: Advice Note 1', [online] available to download via: <<https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>> last accessed [11/12/18]

⁵⁰ Historic England (2016): 'SA and SEA: Advice Note 8' [online] available to download via: <<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>> last accessed [11/12/18]

⁵¹ Historic England (2017): 'Setting of Heritage Assets: 2nd Edition', [online] available to download via: <<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>> last accessed [11/12/18]

⁵² Historic England (2018): 'Neighbourhood Planning and the Historic Environment', [online] available to download via: <<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>> last accessed [11/12/18]

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 policies listed within the document, the following directly relate to the Landscape and Historic Environment.

- Policy 23: Natural environment;
- Policy 24: Historic environment; and
- Policy 25: Green infrastructure.

Summary of current baseline

Cornwall and West Devon Mining Landscape World Heritage Site

The south west of the plan area lies within the Cornwall and West Devon Mining Landscape World Heritage Site. The Cornwall and West Devon Mining Landscape was inscribed as a UNESCO World Heritage Site (WHS) in 2006, encompassing ten areas within the region with significant mining heritage, including the ‘Tamar Valley Mining District with Tavistock’ area. Much of the landscape of Cornwall and West Devon was transformed in the 18th and early 19th century because of the rapid growth of pioneering copper and tin mining. The Outstanding Universal Value of the WHS reflects 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.

Historic Character of Truro

Truro’s expansion began in the 18th century in response to the growth of Cornwall’s mining industries. Substantial merchant houses were built in Princes Street, the Assembly Rooms were opened, and the generous width of Boscawen Street was created by uniting two former streets. In the early 19th Century, Lemon Street was built, more uniform architecturally than anything Truro had seen before, plus subsidiary artisan streets such as Carclew Street and Daniell Street. On the opposite side of the bowl formed by the two rivers terraced housing began to be built off Mitchell Hill.

These developments set the tone for the city centre (and the Conservation Area) as seen today, yet compared to other towns they were limited and unambitious. More substantial change came with the opening of the railway in 1859, the building of new banks and commercial premises, and the establishment of institutions such as Truro School (1880). The choice of Truro in 1876 as the seat for an Anglican bishopric, followed a year later by its achieving city status, were clear indicators that it was now a place of real substance. Pearson’s Cathedral (1887- 1910), planted at its heart, symbolised that transformation.⁵³

⁵³ Cornwall Council (2010) Truro Conservation Area Management Plan [online] available at: <<https://www.cornwall.gov.uk/media/3638238/Truro-CAMP-March-2010.pdf>> last accessed [31/01/20]

Designated Heritage Assets

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

The Neighbourhood Plan area contains one Grade I, eight Grade II* and 329 Grade III nationally designated listed buildings which are protected through the Listed Buildings and Conservation Areas Act 1990. The Grade I and II* listed buildings are as follows:

- Truro Cathedral (Grade I);
- Landers Monument (Grade II*);
- Old Mansion House (Grade II*);
- Penhaligon House, Princess Street Front (Grade II*);
- The Mansion House and Attached Forecourt Railings (Grade II*);
- The City Hall (Grade II*);
- Truro Crown Courts (Grade II*);
- Church of St Keyne (Grade II*); and
- Princes House (Grade II*).

Scheduled monuments are sites of national importance and protected by the Ancient Monuments and Archaeological Areas Act 1979. According to the National Heritage List for England⁵⁴, there are ten scheduled monuments within the Neighbourhood Plan area, namely:

- Standing cross at High Cross, 30m west of Truro Cathedral;
- Round and associated remains 150m south of Mount Pleasant;
- Round 180m north east of Polstein;
- Round 200m north west of Penventinnie;
- Hillfort 225m north east of Bosvisack;
- Bowl barrow 425m north west of Little Regarded Farm
- Two bowl barrows 250m south east and 230m north east of Ashgrove Farm;
- The Three Burrows;
- Two bowl barrows at Two Burrows, 200m north east of Fair-View Farm, Allet; and
- The Four Burrows.

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 understanding and articulation of its character - mentioned within the 'Conservation Area Designation,

⁵⁴ Historic England: National Heritage List for England: <<http://list.historicengland.org.uk>> last accessed [20/09/2018]

Appraisal and Management' advice note by Historic England⁵⁵. Ideally, appraisals should be regularly reviewed as part of the management of the Conservation Area and can be developed into a management plan. In this context, Truro city centre has been designated as a conservation area. According to the Truro Conservation Area Management Plan, the key elements of the conservation area are as follows:

- The topographical setting of the city, and the role that water (rivers, the waterfront, the leats) plays in it.
- The substantial survival of its medieval layout, including its streets and alleys (or opes).
- The compactness of its city centre: everything is within convenient walking distance.
- The survival of historic buildings, principally of the 18th to 19th Centuries. There are 280 listed buildings in the Conservation Area.
- The role of the Cathedral as the landmark which defines the city.

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 2018 Heritage at Risk Register for South West England⁵⁶ there is one scheduled monument considered to be 'at risk', which is 'Round 200m north west of Penventinnie'.

However, 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 the two Grade II listed buildings within the Neighbourhood Plan are at risk.

Locally important Heritage Features

It should be noted that not all of 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 seen as important by local communities. For example, open spaces and key distinctive buildings in the area are likely to be of value for local people.

Following a high-level review of the Historic Environmental Record (HER) for Cornwall (accessed via the Heritage Gateway)⁵⁷, there are 411 records within Truro Parish including a variety of structures and archaeological finds from the medieval period (including settlements, castles, friaries, workhouses, schools and quays). There are also 77 records within Kenwyn Parish including more medieval castles, settlements, quays, barrows, churches and houses.

⁵⁵ Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to download from: <<https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>> last accessed [20/09/18]

⁵⁶ Historic England (2018): 'Heritage at Risk Register for South West England', [online] available to download at: <<https://historicengland.org.uk/images-books/publications/har-2018-registers/>> last accessed [10/03/19]

⁵⁷ Heritage Gateway (2019): Historic Environmental Record for Cornwall', [online] available to access via: <<http://www.heritagegateway.org.uk/gateway/>> last accessed [11/03/19]

Summary of future baseline

New development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout. 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 Plan area there may be opportunity for new development to enhance the historic setting of the village and better reveal assets' heritage significance.

A6 – Land, Soil and Water Resources

Context review

The EU's Soil Thematic Strategy⁵⁸ 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;
- 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.

The NPPF pursues the protection of high-quality soil resources and the improvement of the water environment. It recognises the wider benefits of natural capital and the need to consider the long-term implications of climate change and ways in which to build resilience. The NPPF encourages efficient land use, utilising brownfield land, land remediation schemes where appropriate and delivering environmental gains.

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

⁵⁸ European Commission (2006) Soil Thematic Policy [online] available at: <http://ec.europa.eu/environment/soil/index_en.htm> last accessed [29/06/18]

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 England⁵⁹, which sets out a vision for soil use in England, and the Water White Paper⁶⁰, 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 England⁶¹ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

In terms of waste management, the Government Review of Waste Policy in England⁶² 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 Plan⁶³ 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 Directive⁶⁴. 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.

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 19: Strategic waste management principles;
- Policy 20: Managing the provision of waste management facilities; and
- Policy 21: Best use of land and existing buildings

Summary of current baseline

Soil Resources

The majority of the plan area is dominated by freely draining slightly acid loamy soils which is suitable for range of spring and autumn sown crops. Under grass the soils also have a long grazing season.

In terms of the location of the best and most versatile agricultural land, a detailed classification has only been undertaken on patches of land that border the parish of Truro. These patches which have been classified comprise of a combination of Grade 2, Grade 3a, Grade 3b and Grade 4 agricultural land.

⁵⁹ Defra (2009) Safeguarding our Soils: A strategy for England [online] available to download from: <<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>> last accessed [20/09/18]

⁶⁰ Defra (2011) Water for life (The Water White Paper) [online] available at <<http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>> last accessed [20/09/18]

⁶¹ Defra (2011) Government Review of Waste Policy in England [online] available at: <<http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>> last accessed [20/09/18]

⁶² DEFRA (2011) Government Review of Waste Policy in England [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69401/pb13540-waste-policy-review110614.pdf [accessed 01/03/19]

⁶³ DEFRA (2013) Waste Management Plan for England [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf [accessed 01/03/19]

⁶⁴ Directive 2008/98/EC

The Provisional Agricultural Land Quality dataset⁶⁵ shows that the Neighbourhood Plan area is predominantly covered by Grade 3 agricultural land with the centre of Truro being classified as 'Urban'. However; without the subset grading (3a or 3b) it is not possible to tell at this stage whether all of the agricultural land is considered to be 'best and most versatile'. It is also important to note that the national dataset is of very low resolution, and may not necessarily provide an accurate reflection of the agricultural land quality within the Neighbourhood Plan area.

Water Resources

The main watercourses in the plan area are the River Allen, River Kenwyn and River Truro. The River Allen rises near Zelah to the north of the city and flows southwards through Idless, entering the city at Daubuz Moors Nature Reserve. It then runs underneath the city centre, where it joins the River Kenwyn. The River Kenwyn rises to the north west of the city, just south of the A30, entering the city north of Bosvigo and running underneath Victoria Square and Lemon Quay. The two rivers then join to form the tidal River Truro. The River Truro then joins the River Fal to the south of the city.

The River Kenwyn and River Allen were assessed by the Environment Agency using the Water Framework Directive Classification System in 2009. With regard to chemical quality, both rivers were classed as 'A' and both also showed a very low phosphate classification of '1'. With regard to nitrates both rivers have moderate levels, and have been classed as grade '4' with an average grade limit of 30mg/l.

The biological quality of the River Allen was classed as grade 'A' and the river described as being in 'very good condition'. An assessment of biological quality has not been undertaken for the Kenwyn River.

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. Within the Neighbourhood Plan area, there is one SPZ which comprises of Zone I – Inner Protection Zone and Zone II - Outer Protection and lies in the northern part of Kenwyn parish. Although, the Neighbourhood Plan allocates land for residential development purposes, such uses are not considered to give rise to ground water pollutants.

The majority of the Neighbourhood Plan area is also within the Truro, Tresillian and Falmouth Nitrate Vulnerable Zone.

Water Quality

The Neighbourhood Plan area lies within the Fal operational catchment⁶⁶. The operational catchment contains ten waterbodies. The water bodies identified as 'Kenwyn' and 'Low River Allen (Fal)' are relevant to the Neighbourhood Plan area. The 'Kenwyn' is classified by the Environment Agency as having 'good' chemical and 'good' ecological quality. The 'Low River Allen (Fal)' is classified by the Environment Agency as having 'good' chemical quality and 'moderate' ecological quality. The reasons that the Low River Allen is not achieving good status relate to poor livestock management and sewage discharge.

Waste

⁶⁵ Natural England (2018) Agricultural Land Classification map London and the South East (ALC007) [online] available at < <http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736> > [accessed 04/03/19]

⁶⁶ Environment Agency (2020) Catchment Data Explorer [online] available at < <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3184> > [accessed 31/01/20]

There is no Household Waste and Recycling Centre (HWRC) in the Neighbourhood Plan area. The nearest are located in St Day and Mabe Burnthouse.

According to the Local Plan, projected waste arisings indicate that Cornwall Council collected waste will increase annually by approximately 30,000 tonnes to a total of 335,000 tonnes per year by 2030. It is anticipated that planned capacity improvements (including the new Cornwall Energy Recovery Centre) will meet the recovery needs of the municipal waste stream.

There will be no additional requirements for new strategic recycling or recovery provision due to planned capacity improvements.

Summary of future baseline

In the future, flooding from surface water runoff may become an increasing issue due to an increased incidence of extreme weather events and an increase of the built footprint in the plan area. Fluvial and tidal flood risk has the potential to increase without appropriate flood prevention measures.

Risk has the potential to increase as a result of the impact of climate change, urban development and inappropriate land use management. This has the potential to reduce the level of protection offered by existing flood alleviation schemes.

In terms of water quality, the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality in watercourses in the area. Water quality is also likely to continue to be affected by pollution incidents in the area, the presence of non-native species and physical modifications to water bodies.

Water availability in the wider area may be affected by regional increases in population and an increased occurrence of drought exacerbated by the effects of climate change.

A7 – Population and Community

Context review

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 Change⁶⁷ 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 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 Community. 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;
- Policy 6: Housing mix;
- Policy 7: Housing in the countryside; and
- Policy 8: Affordable housing.

⁶⁷ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> last accessed [21/09/18]

Summary of current baseline

Population

According to the most recent census data available, in 2011 the total population of the parish of Truro was 18,766, with the population of the parish of Kenwyn 5,80068. The overall population for the plan area was therefore 24,566 in 2011.

In the parish of Truro this was an increase of 1,335 from the 2001 census, or a 7.66% growth, with a population increase of 856, or a 17.31% growth, in the parish of Kenwyn. The rate of growth in Kenwyn parish is significantly higher than local, regional and national comparators, while the rate of growth of Truro parish is higher than the growth rate of Cornwall and similar to regional and national growth rates. Overall, the population of the Neighbourhood Plan area has increased by 9.79%, which is significantly higher than county, regional and national growth rates.

The Neighbourhood Plan area has a higher proportion of individuals in the 0-15 age range than the Cornwall average, although figures are in line with the region and national averages. The plan area has a slightly lower proportion of people aged 16-24 than England and the south-west, but is otherwise largely in line with local averages. 25.9% of the population of the parish is aged 25-44, compared with a lower 22.5% in Cornwall, but higher than the 26.5% in the south-west and 27.5% across England. The 45-59 age group within the plan area is consistent with national and local averages but significantly lower than regional averages. The proportion of residents aged 60 or over is slightly lower in the plan area than in Cornwall and the south-west, but higher than national averages

There are 6,376 people aged 60 or over living in the plan area, which is 26% of the population. In Truro, 27.7% of the population in Truro is aged 60 and over, compared to a lower figure of 20.3% in the more rural parish of Kenwyn. The relative percentage of people aged over 65 has remained relatively constant in Truro from 2001.

In terms of ethnicity, 93.5% of the population in the plan area is classed as White British. This is a lower proportion than Cornwall (95.7%), and higher than the south west (91.8%) and England (79.8%) averages. 0.2% of the population of the plan area is Asian, and 0.2% is Black, which is significantly lower than the respective national averages of 7.8% and 3.5%.

Census statistics which measure deprivation across the four 'dimensions' of deprivation including: any member of a household not a full-time student is either unemployed or long-term sick; education (no person in the household has at least level 2 education, and no person aged 16-18 is a full-time student); health and disability (any person in the household has general health 'bad or 'very bad' or has a long term health problem); and housing (household's accommodation is either overcrowded, with an occupancy rating -1 or less, or is in a shared dwelling, or has no central heating), show that the two parishes which make up the Neighbourhood Plan area have slightly lower levels of deprivation than Cornwall, regional and national averages.

Deprivation is slightly higher in Truro than in Kenwyn, however deprivation levels are lower in both parishes than the Cornwall average. Household deprivation in two and three dimensions is slightly higher in Truro than the South West averages, but in line with

⁶⁸ Office for National Statistics (2011) Neighbourhood Statistics [online] available at: <http://www.neighbourhood.statistics.gov.uk/dissemination/>

national averages. There are no significant values for households deprived in four dimensions across the plan area.

Levels of overcrowding, although low in comparison to regional and national averages, are slightly higher in Truro than across Cornwall. 4.9% of households in Truro have an occupancy rating of -1, meaning that they have at least one room fewer than required, compared with 4.6% across the county. 1.4% of households in Truro have at least two rooms fewer than required, compared with the county average of 1.2%.⁶⁹

In terms of the house price to income ratio, which illustrates the multiple of the average income in the area to average house price, the affordability ratio for Cornwall in 2013 was 8.42, a decrease from 9.11 in 2010. This is significantly higher than the ratio of 6.72 for England.⁷⁰

The plan area has a high proportion of its residents living in housing owned either outright or with a mortgage, in line with all comparator areas. Kenwyn has higher levels of ownership than Truro and Cornwall, regional and national averages, and significantly lower social and private rented tenures by household. Truro has a higher proportion of rented tenures equivalent to the national average of 17% private rented and 18% social rented tenures, which is significantly higher than county and regional averages.

In 2012, the last year for which data is available, there were 28,336 households on local authority housing waiting lists in Cornwall, an increase of 20,621 since 2010.⁷¹

The population of the plan area is generally well qualified, with 31% and 32% of residents aged 16 and above in Kenwyn and Truro respectively having at least a Level 4 Qualification⁷². This is significantly above the county level (25%) but higher than both the regional (27%) and national (27%) averages⁷³. Fewer people in the plan area have no qualifications (15% in Kenwyn; and 20% in Truro) than the average in Cornwall (22%), the south west (21%) and national average (22%).

The Neighbourhood Plan area has a higher proportion of economically active residents than Cornwall averages, with Kenwyn having significantly higher averages in full time employment than the other areas considered. The plan area has also a higher percentage of part time employees. Percentages of self-employed, unemployed and full time students are in line with county, regional and national averages. The percentage of sole traders in the plan area is lower than the county and regional average, but largely in line with national averages.

Kenwyn parish has significantly fewer economically inactive residents than Truro parish and county, regional or national averages. The percentage of economically inactive residents in Truro parish is in line with national averages but remains significantly lower than the average for Cornwall. There is a significantly higher percentage of retired economically inactive people in Truro than the national average, but a lower percentage students and carers.

Economy and enterprise

⁶⁹ ONS (2011) Census 2011, Occupancy rating (rooms) (QS408EW)

⁷⁰ DCLG, statistics sourced from Shelter Housing Databank website:

http://england.shelter.org.uk/professional_resources/housing_databank This data is not available at ward or parish level.

⁷¹ DCLG (2012) Statistical data set Live tables on rents, lettings and tenancies. Table 600: numbers of households on local authorities' housing waiting lists, by district: England 1997 to 2013.

⁷² Level 4 and above qualifications cover: Degree (BA, BSc), Higher Degree (MA, PhD, PGCE), NVQ Level 4-5, HNC, HND, RSA Higher Diploma, BTEC Higher Level, Professional Qualifications (Teaching, Nursing, Accountancy).

⁷³ ONS (2011) Census 2011, Qualifications and Students (KS501EW)

Economic activity rates in the Neighbourhood Plan area are slightly higher in comparison to county, regional and national averages. Rates of full-time employment are higher in Kenwyn (40.8%) and Truro (37.2%) than across Cornwall (31.7%). Averages for Truro however are below those found regionally (37.4%) and nationally (38.6%). Rates of part-time employment for the plan area are above regional and national averages, while rates of self-employment are broadly in line with regional and national averages. The proportion of residents who are unemployed is below county, regional, and national averages. The number of people retired in Kenwyn is significantly lower than national averages, while the number of people retired in Truro is significantly higher than the national average.

Overall, the occupation profile of the Neighbourhood Plan area is largely similar to regional and national averages, with some notable exceptions including a significantly larger number of people working in 'human health and social work activities' (significantly in Kenwyn) than at county, regional and national level. Likewise there are considerably fewer people working in manufacturing across the plan area than other comparables. Truro has a larger percentage of people working in 'Education', and 'Accommodation and Food Service Activities' than the other areas considered.

The plan area has higher levels of 'Wholesale and Retail Trade; Repair of Motor Vehicles and Motor Cycles' than county, regional and national averages, with lower levels of 'Professional, Scientific and Technical activities in Kenwyn.

Summary of future baseline

The population of the Neighbourhood Plan area is predicted to grow and age in the future. This will place pressure on existing health and community facilities that are likely to face greater demand from residents.

Obesity is 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.

The plan area has a skilled workforce, with a higher than average proportion of residents educated to degree level. On the basis of the Local Plan, employment growth in the plan area is likely to be focussed on Truro City and Threemilestone, with a smaller quantum of growth likely to be allocated to Shortlanesend.

Given the occupation and skills profile of the Neighbourhood Plan area, new employment provision within the plan area has the potential to provide opportunities for skilled trades and service industries as well as technical and scientific activities.

A8 – Health and Wellbeing

Context review

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 Lives⁷⁴ ('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 there is: "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities".

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.

The Cornwall Local Plan: Strategic Policies 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, in regard to the 28 policies listed within the document, the following are relevant to the Health and Wellbeing SEA theme:

- Policy 16: Health and wellbeing
- Policy 25: Green infrastructure

Current baseline

General health across the Neighbourhood Plan area is broadly favourable. 48.3% and 53.3% of people reported that they were in 'very good' health⁷⁵, which is higher than county, region and national averages. Likewise the proportion of people reporting that they had 'fair', 'bad' or 'very bad' health is lower than averages for Cornwall.

⁷⁴ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: < <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> > last accessed [24/09/18]

⁷⁵ ONS (2013) Census 2011 General Health (QS302EW)

1.2% of residents of Truro parish stated that they have 'very bad' health, which is broadly in line with local, regional and averages. 9.1% of residents of Truro stated they were limited 'a lot' with day to day activities due to long-term health problems or disabilities, with 11.1% of people limited 'a little'. These long-term health problems and disability averages are lower than local values in Cornwall but higher in comparison with regional and national averages.

6.7% of residents of Kenwyn parish reported that they were limited 'a lot' with day to day activities due to long-term health problems or disabilities, with 8.1% of people limited 'a little'. Overall in Kenwyn parish, the proportion of people limited in day-to-day activities with health problems and disabilities and in 'very bad' health is lower than neighbouring parish Truro, and is favourable when compared to Cornwall, regional and national averages.⁷⁶

No data exists for the plan area for life expectancy and health indicators; however at the county level the 2013 Health Profile⁷⁷ shows that life expectancy in Cornwall is 79.5 for men and 83.5 for women; above the national average of 73.8 and 79.3, respectively. Life expectancy is 4.3 years lower for men and 3.9 years lower for women in the most deprived areas of Cornwall than in the least deprived areas. Local priorities in Cornwall include reducing smoking, physical inactivity, unhealthy diets, excess alcohol and lack of social connections.⁷⁸

Over the last 10 years, all-cause mortality rates have fallen in Cornwall. Early death rates from cancer and from heart disease and stroke have fallen and are better than the England average. An estimated 21.0% of adults smoke and 25.0% are obese. There were 11,816 hospital stays for alcohol related harm in 2009/10 and there are 1,039 deaths from smoking each year.⁷⁹ About 18.1% of Year 6 children are classified as obese in Cornwall. A higher percentage than average of pupils spend at least three hours each week on school sport.

Summary of future baseline

The population of the Neighbourhood Plan area is predicted to grow and age in the future. This will place pressure on existing health and community facilities that are likely to face greater demand from residents.

Obesity is 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.

A9 – Transportation

Context review

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

⁷⁶ ONS (2011) Census 2011, Long-term health problem or disability (QS303EW)

⁷⁷ Public Health England (2013) Health Profile 2013 [online] available at:

<http://www.apho.org.uk/resource/view.aspx?RID=50215&SEARCH=Cornwall&SPEAR> (accessed 16/10/2014)

⁷⁸ Public Health England (2013) Health Profile 2013 [online] available at:

<http://www.apho.org.uk/resource/view.aspx?RID=50215&SEARCH=Cornwall&SPEAR> (accessed 16/10/2014)

⁷⁹ Public Health England (2013) Health Profile 2013 [online] available at:

<http://www.apho.org.uk/resource/view.aspx?RID=50215&SEARCH=Cornwall&SPEAR> (accessed 16/10/2014)

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 plan-making and development proposals, so that:
 - i. The potential impacts of development on transport networks can be addressed
 - ii. Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised
 - iii. Opportunities to promote walking, cycling and public transport use are identified and pursued
 - iv. The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account
 - v. 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.'

At the local level, 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. In this regard, 'Connecting Cornwall 2030'⁸⁰ is the third Local Transport Plan (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 our 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 2015-2019.

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.

Summary of current baseline

Rail network

The plan area is well connected by rail. Located on the main London/Bristol to Penzance line, the Truro is served by long distance First Great Western services to Plymouth (c 1 hour 15 mins), Exeter (c.2 hour 20 mins) and London (c.5 hours). It is also served by

⁸⁰ Cornwall Council (2011): 'Connecting Cornwall: 2030 Strategy', [online] Available via: <<http://www.cornwall.gov.uk/transport-and-streets/transport-policy/local-transport-plan-connecting-cornwall-2030/connecting-cornwall-2030-strategy/>> last accessed [03/02/17]

Cross Country Trains services to Bristol (c.3 hours 30 mins), Birmingham (c.5 hours 15 mins) and the north of England and Scotland.

Truro railway station is also the terminus for the Maritime Line, a branch line which links the city with Falmouth Docks/Town, Penryn and Perranwell.

Within Cornwall, travel times from Truro railway station are as follows:

Table A9.1: Travel times by rail from Truro to selected stations in Cornwall

Rail station	Travel time
Penzance	43 minutes
Hayle	25 minutes
Camborne	19 minutes
Redruth	12 minutes
St Austell	16 minutes
Bodmin Parkway	36 minutes
Liskeard	48 minutes
Penryn	14 minutes
Falmouth Town	21 minutes

Road network

Two main routes connect Truro with the rest of Cornwall. The A390 links the city with St Austell and the A38 in the east, and to the A30 near Blackwater in the west. The A39 connects the city with the A30 to the north and with Penryn, Devoran, Falmouth (and, via the A394) Helston to the south.

Bus network

As a key commercial centre of Cornwall, Truro has an extensive bus network, with routes serving numerous surrounding towns and villages and settlements further afield. Truro also has one Park and Ride scheme, which is located at Langarth Park on the A390 at Threemilestone. Beginning operation in August 2008, the service carries passengers into the city centre via Truro College, the Royal Cornwall Hospital Treliske, County Hall, Truro railway station, the Royal Cornwall Museum and Victoria Square.

Cycle network

Truro is connected by two National Cycle Network routes. National Cycle Route 32 connects Truro with Bodmin via Newquay and the Camel Trail. Truro is also located on the Cornish Way, which comprises National Cycle Route 3 and connects Bude to Land's End via St Austell. There is also a largely segregated cycle route from Threemilestone to Truro railway station.

Availability of cars and vans

In Truro, the proportion of households with no access to a car/van is significantly higher than county averages, and the proportion of the population with two or more cars/vans is significantly lower. This reflects the city's urban nature, with an associated increase in accessibility to services and facilities by public transport and walking/cycling. Conversely, in Kenwyn, the proportion of households with no access to a car or van is lower than county averages, and the proportion with two or more cars/vans higher. This reflects the more rural nature of the parish, as well as its relative affluence.

Congestion and travel to work

There are currently an estimated 14,000 commuter trips into the Truro each day, causing significant congestion on the key strategic routes into the city, including the A390 western corridor. This has economic implications; according to a 2012 study, the cost of congestion in Truro amounted to approximately £3.4m per year. This is expected to rise to £10m per year by 2030. In addition, the estimated value of losses for non-business trips associated with congestion is a further £14m.

A significantly higher proportion of people travel to work by foot in Truro, reflecting the more compact nature of the city and employment opportunities available locally. Kenwyn has a significantly higher proportion of people travelling by car or van to work than county, regional and national averages. However a significantly higher proportion of commuters also travel by bus or cycle in Kenwyn. This reflects the proximity of a high proportion of the parish's population to the A390 corridor. Overall, bus use in both Kenwyn and Truro is higher than Cornish averages, reflecting the good bus network present locally.

Fewer people work from home in the Neighbourhood Plan area compared to Cornwall averages. This is likely to reflect the ready accessibility of places of employment to residents.

In terms of commuting patterns, the largest inflows of commuters to the Neighbourhood Plan area are from the Camborne/Pool/Redruth/Chacewater direction, followed by the A394/Falmouth and Penryn direction.

Summary of future baseline

A continued reliance on the private car is highly likely within the Neighbourhood Plan area, particularly given the rural nature of the Parish. Residents are likely to continue to travel outside of the Plan area to access a wider range of services and facilities, including within Callington, Tavistock and Plymouth.

New development has the potential to increase traffic and lead to additional congestion issues within the Neighbourhood Plan area. This is particularly significant in the local context, due to the pressures from narrow roads, steep incline, vehicle type and the stop-start effect of the traffic lights at certain locations.

