

Penzance Neighbourhood Plan Regulation 14 Consultation - Cornwall Council Environmental Resilience and Adaptation Team Comments.

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<p>Cornwall Council is a statutory consultee as Coast Protection Authority and Lead Local Flood Authority. Please note that the roles and responsibilities of the different Risk Management Authorities (RMAs) are as follows:</p> <ul style="list-style-type: none"> • <i>Coast Protection Authority</i> (Cornwall Council): Coastal erosion. • <i>Lead Local Flood Authority</i> (Cornwall Council) – Flooding from surface water run-off, ordinary watercourses and groundwater, • <i>Environment Agency</i> – Flooding from main rivers, reservoirs and the sea, • <i>The Water Company (South West Water)</i> – Flooding from sewers and water supply systems. <p>See: Flood Risk Management Responsibilities - Cornwall Council</p> <p>I have reviewed Penzance Neighbourhood Development Plan (NDP) from a climate change resilience and adaptation perspective, with a particular focus on coastal erosion and flooding from surface water run-off and ordinary watercourses.</p> <p>Penzance parish has three historic towns and strategic infrastructure with multiple vulnerabilities to flooding and coastal erosion. The parish is located in the downstream part of five water body catchments and receives fluvial and surface water run-off from the upper part of those catchments which are in neighbouring parishes (St Buryan, Lamorna and Paul; Sancreed and Madron). Those parishes have a role to play in reducing fluvial and surface water flood risk and water quality issues in Penzance parish through sustainable land management and Natural Flood Management (NFM) approaches. Collaboration between the parishes is encouraged to support a whole catchment approach.</p> <p>The Penzance NDP correctly identifies the main flooding and climate change risks for the parish. Penzance and Eastern Green have a significant coastal erosion risk and an adaptation plan is needed imminently to ensure the sustainability of these communities. I'm surprised at the lack of local coastal erosion policies given the risks in the parish and have made some suggestions as to the type of policies that can be included without duplicating other existing planning policies. I recommend taking a precautionary approach by designating the whole parish as a CCMA since the location of any land needed for future roll-back of infrastructure and properties isn't yet decided.</p> <p>Flood risk policies are largely covered by other local and national policies. I understand the site allocations were not determined by the NDP team, but there is one site where the NDP is encouraging housing development that is in a flood risk area. I've made some suggestions about the use of NFM and suggest you take advice from the LLFA's SuDS</p>

Thank you for taking the time to provide comments on the Plan.

Officer on the drainage policies. Other teams in the CC Environment Service will respond in more detail on biodiversity and environmental designations.

A tremendous amount of work and research has gone into producing this NDP. There are some really positive sustainable design, drainage and green infrastructure policies which will all help with encouraging more climate resilient development. I've provided some additional supporting information, clarifications and recommendations below to help with finalising the content.

INTRODUCTION and CONTEXT SUMMARY

Page no. / policy ref.	Comments
1.6 Climate Change P6-p.7	<ul style="list-style-type: none"> • Check the page numbering – there are two page 7's. • The link to the Cornwall Climate Change Action Plan on p.6 is broken. It can be found at: Climate Change Action Plan (cornwall.gov.uk) • The bullet and footnote link on p.7 references the wrong Marine Plan. The relevant one is the SW Marine Plan here: The South West Marine Plans Documents - GOV.UK (www.gov.uk) • The link to the Maritime Strategy on p.7 is broken – it can be found at: maritime-strategy-2019_2023.pdf (cornwall.gov.uk) • The Cornwall Local Flood Risk Management Strategy should be added to the list of key documents. • The Shoreline Management Plan should be added to the list of key documents • Check the latest SW FRMP link with the EA – the NDP currently links to a consultation draft. Likewise for the SW RBMP. • You may also wish to add the Cornwall Climate Risk Assessment which highlights many of the climate change risks relevant to Penzance

THE PLAN'S OVERALL VISION AND COMMUNITY VISION STATEMENTS

Page no. / policy ref.	Comments
p.15 The Vision p.29 5.12 DDH Key objectives	<p>Vision I support this wording in the overall vision statement: “...responds positively to the challenges posed by a changing climate.” This succinctly includes mitigation, resilience and adaptation.</p> <p>Objectives The 5th bullet/ objective could be strengthened and linked to the vision and policies by including climate change resilience and adaptation. Some suggested additional wording is highlighted in purple below:</p> <p><i>“To ensure that the design of new development and where possible repurposing* of existing buildings responds effectively to the climate change emergency in terms of energy sources and conservation, water conservation, recycling, accessibility and transport; and is resilient to climate change and coastal change impacts.”</i></p> <p>Or you could be less specific and just say ‘responds effectively to the climate change emergency’ or the ‘causes and impacts’ of climate change.</p> <p>*Rather than repurposing I would suggest alterations to existing buildings would have a wider scope (e.g. extensions and replacement dwellings are an opportunity to improve climate resilience).</p> <p>I support this objective: “To assess development proposals in the context of the latest available evidence on the impacts of climate change;”</p> <p>Community Vision Statements</p>

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	<p>I note Mousehole has a climate resilience objective: <i>“To prevent further flooding, particularly in relation to impacts with Mousehole being downstream of Paul.”</i></p> <p>Paul has a similar objective: <i>“To ensure that any new development is supported by sufficient and appropriate infrastructure improvements, including drainage, utilities and educational facilities... To prevent further flooding in Paul, with consequent significant impacts downstream in Mousehole.”</i></p> <p>The other local objectives don’t specifically mention climate change.</p>
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DEVELOPMENT, DESIGN AND HERITAGE

Page no. / policy ref.	Comments
Policy DDH1: Design and Local Distinctiveness p.33	<p>The climate change resilience aspect of the following policy could be strengthened by making the following amendments in red:</p> <p><i>...“Materials and finishes should be in keeping with the locality and be of sufficient quality and design to withstand the effects of the local maritime climate and the impacts of climate change (for example, using resilient materials and siting to reduce rusting and discolouration and the impact of high winds).”</i></p>
Policy DDH4: Sustainability p.39	<p>I support this policy.</p> <ul style="list-style-type: none"> • Additional justification: The rainwater collection and greywater recycling policy will help to reduce surface water run-off, drought impacts and carbon emissions. • Water efficient fittings could also be encouraged. • I think the SuDS policy is a bit hidden here and would fit better under policy DDH8. • Developers may use the words ‘practicable’ and ‘viable’ not to include some sustainable design principles. ‘Feasible’ is ok. ‘Should be’ also lowers the weighting. The policy is encouraging best practice.
Policy DDH8: Flooding and Drainage Impact of Development Proposals p.46	<p><u>Policy DDH8: Flooding and drainage impact of development proposals</u></p> <p><i>1. Development proposals should demonstrate through a Drainage Statement:</i></p> <p><i>i) how the arrangements for the disposal and management of surface water, waste-water and foul water are to be managed;</i></p> <p><i>ii) where the development is to be connected to an existing combined sewer, that this will have no adverse impact on capacity;</i></p> <p><i>iii) how surface water from the site is to be separated from foul water; and</i></p> <p><i>iv) that the proposed sustainable drainage systems comply with the criteria set by Cornwall Council as Lead Local Flood Authority;</i></p> <p><i>v) that they will have no adverse impact on the Mounts Bay Marine Conservation Zone.</i></p> <p>The climate change resilience aspect of the following policy could be strengthened by making the following amendments in red:</p> <p><i>1. “Development proposals should must demonstrate evidence through a Drainage Statement:</i></p> <p><i>i) how the arrangements for the disposal and management of surface water, waste-water and foul water are to be managed and maintained;”</i></p> <p>Policies ii) and iii) are contrary – iii) should come first in the hierarchy and ii) could say “where it can be evidenced there is no alternative but to connect to combined sewers...” Connection to combined sewers should be strongly discouraged. This policy could promote the use of natural above ground SuDS and retrofit SuDS to manage surface water flows and avoid (or even remove existing) connections to CSOs.</p>

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Please consult Cornwall Council's SuDS Officer on the content of this policy.

Please consult SWW on the sewer capacity policy.

Policy DDH8: Flooding and Drainage Impact of Development Proposals

2. *Major development proposals within the Parish should not only provide a long-term water management plan, but also demonstrate that adequate contractual and funding arrangements are in place to ensure the continuity of the plan over the lifetime of the development in terms of responsibility for ongoing maintenance and inspection of drainage systems.*

This policy is good, it's something that often gets ignored and can cause future problems if not planned for. Where the drainage system includes natural, above-ground SuDS, nature-friendly maintenance could be encouraged.

Policy DDH8: Flooding and Drainage Impact of Development Proposals

3. *For major development proposals within the Penzance Critical Drainage Area, the required demonstration of surface water runoff "betterment" should take account of the contribution of existing trees and hedges on the site to flood risk mitigation.*

Please consult Cornwall Council's SuDS officer on this one. I would advise strengthening the SuDS content of policy DDH8. Some good practice SuDS approaches include:

1. Open, natural systems rather than underground storage tanks.
2. Multifunctional SuDS that provide habitat and public access to nature as well as flooding and water quality management.
3. Mimicking the natural situation, and not concentrating flows into one area.
4. Siting, adoption and maintenance of the features considered at an early stage as this is often a complex issue which can impact on the resulting SuDS features implemented. Early consideration will avoid SuDS being retrofitted as an afterthought into the least appropriate locations.
5. The EA's surface water flood risk maps provide a useful tool for siting and designing SuDS features to respond to the natural water flows in an area. Designing to the natural topography of a site rather than levelling it is also desirable from a drainage and local character perspective.
6. Ensure trees are not sited where falling leaves may block highway drainage networks.
7. Locate trees, Cornish hedges and hedge-banks across contours to intercept and slow down run-off on steep slopes.
8. Where relevant, SuDS features could utilise, restore or enhance historic water management features on site (e.g. ditches, ponds, least/ rills). The CC Strategic Historic Environment team can advise on this.

Justifications for a green SuDS policy:

- Green open SUDS provide multiple benefits to people and nature.
- Above-ground systems are easier to maintain than underground tanks.
- Policy alignment: [Cornwall Council Sustainable Drainage Policy V1.0 \(cornwall.gov.uk\)](https://www.cornwall.gov.uk/cornwall-council-sustainable-drainage-policy-v1.0): "Water storage areas should be designed and integrated into the development with drainage, recreation, biodiversity and amenity value."
- Policy alignment: [Climate Emergency Development Plan Document \(DPD\) - Cornwall Council](#) – Policy CC4 Sustainable Drainage System design and Policy CC3 Reduction of

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Flood Risk; *prioritise the use of non-buried SuDS, including retrofit SuDS, deliver multiple benefits and reduce flood risk.*

- Policy alignment: [Cornwall Local Flood Risk Management Strategy](#) – Objective F Multiple Benefits (p15) and Objective C development Planning and Regeneration (p.12).
- Policy alignment: [Flood risk and coastal change - GOV.UK \(www.gov.uk\)](#) – Sustainable Drainage Systems guidance, for instance: “*The layout and function of drainage systems needs to be considered at the start of the design process for new development, as integration with road networks and other infrastructure can maximise the availability of developable land*”. Preference to multifunctional SuDS.
- Policy alignment: DEFRA 25-Year Environment Plan - Putting in place more sustainable drainage systems.

The link on p.43 is broken - [Penzance CDA 2015.pdf \(cornwall.gov.uk\)](#)

Natural Flood Management and SUDS

NFM is most effective for small flood events and flooding to small communities. It can reduce surface water, agricultural run-off and fluvial flooding. Coastal NFM features (like sand dunes) can reduce the risk of coastal erosion, tidal flooding and sea-level rise.

Recommendation:

The NDP could include a policy encouraging the use of NFM that areas of good potential for NFM should be safeguarded from development where possible. Many of these areas will align with the existing safeguarded green spaces, especially the river corridors, so this provides an additional justification for protecting those spaces.

Climate change may increase the risk of drought which could have economic impacts for local farms and businesses. Intelligently designed NFM and SuDS could help to reduce this risk.

To clarify: Natural, open SuDS are a type of Natural Flood Management.

Urban SuDS tend to be in a more constrained space and comprise a mix of soft and hard engineered systems. Examples include crates (discouraged), hydro-brakes, French drains, swales, rain gardens, dry detention basins, permeable paving, rills, green walls and green roofs.

Rural SuDS: Are more natural features like ponds and woodlands

There are online NFM opportunity mapping tools which could be used to identify land that should be safeguarded. Developers could also refer to them when planning SuDS schemes:

- The EA’s [WWNP opportunity map](#) indicates high level opportunities along the Rosemorran stream, Trevaylor Stream, Chyandour Brook, Heamoor Stream, Lariggan River, Tredavoe Stream, Newlyn Coombe River, Paul Stream and Tumble Tyn.
- [The Devon and Cornwall NFM Studio Tool](#) is a more technical tool which landowners and consultants may find useful for designing NFM and SuDS schemes. This tool maps opportunities down to field scale and provides before and after hydrographs for different types of intervention. In both cases the opportunities identified by the mapping tools will need to be ground-truthed for any prospective features - in consultation with landowners. Developments on greenfield sites should be referred to this tool.

The [CIRIA NFM Manual](#) describes the different NFM approaches that can be taken and is another useful resource to signpost scheme developers to.

The following videos may be useful as a communication tool for the NDP group:

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[Down the Drain a Cornwall Climate Care documentary](#)

[Natural Flood Management – High Water Common Ground \(devon.gov.uk\)](http://devon.gov.uk)

[Planning for flood risk in England - Town and Country Planning Association \(tcpa.org.uk\)](http://tcpa.org.uk)

Catchments

The five Water Body catchments feeding into Penzance parish are:

- South Coast Streams, Loe Bar, Merton Point
- [Newlyn River](#)
- Lariggan River
- Chyandour Brook
- [Trevaylor Stream](#)

Information about WFD catchments can be viewed at: [England | Catchment Data Explorer](#).

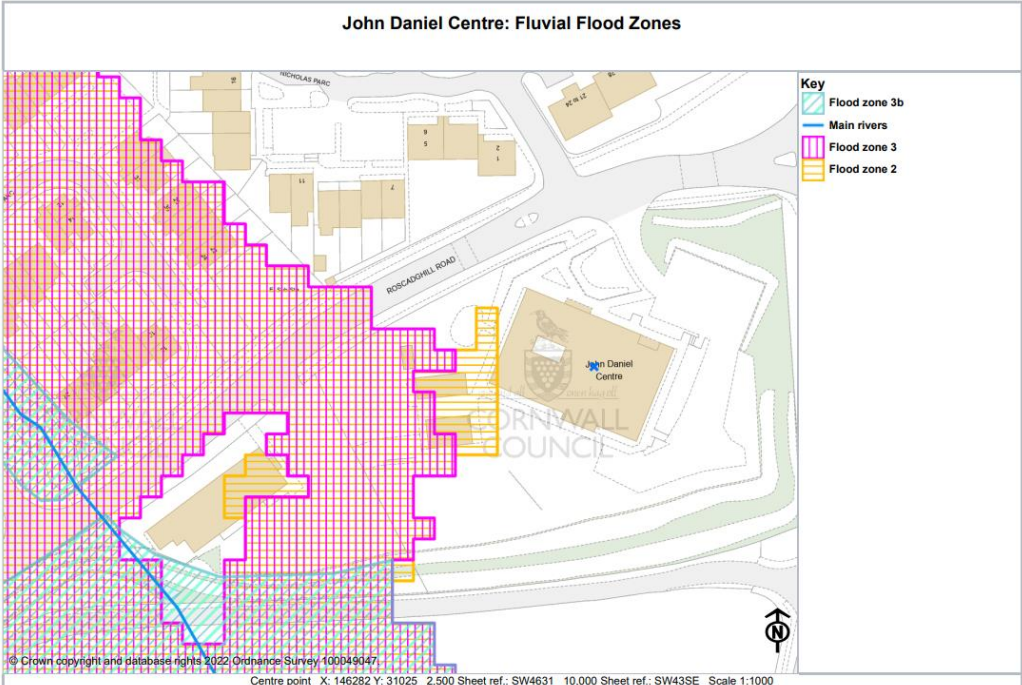


[Intranet Mapping - Historic and Natural Environment Data \(cornwall.gov.uk\)](#)

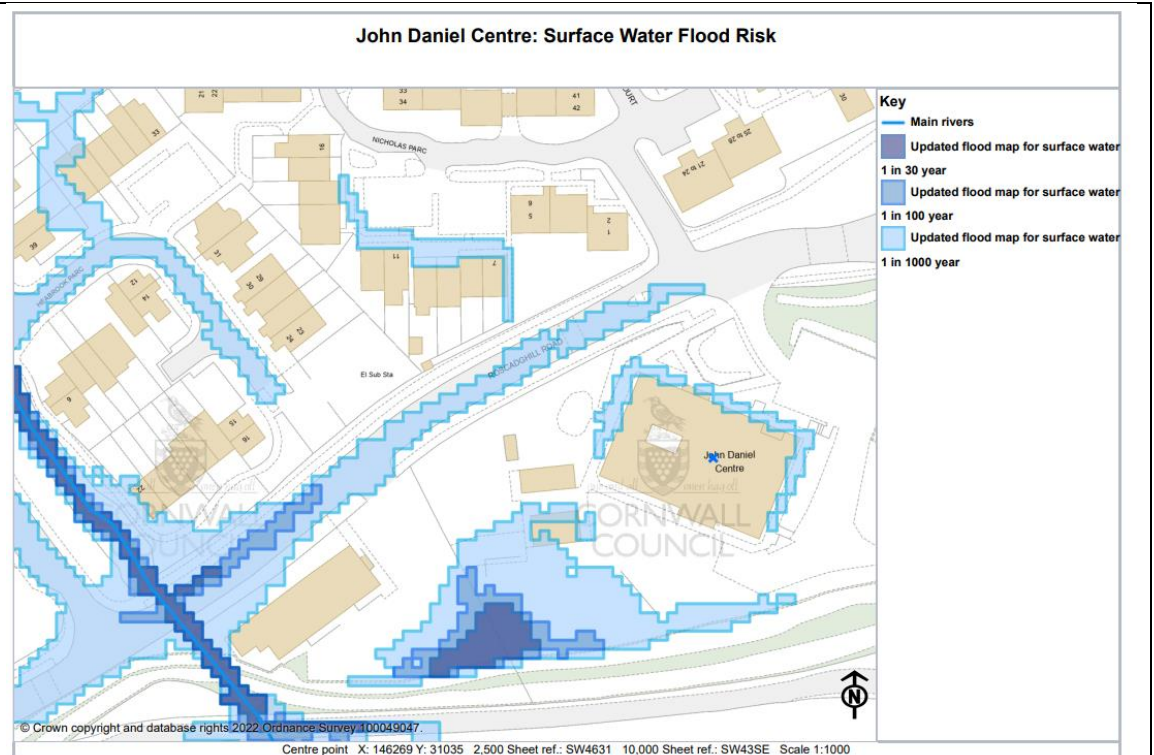
ECONOMY

Page no. / policy ref.	Comments
Policy EC4: Sustainable Tourism	The policy could steer campsites and other holiday accommodation away from areas of high flood risk or coastal erosion risk. Visitors staying in the area could be particularly vulnerable because they won't have the awareness of local risks and may be staying in tents or other single-storey accommodation where they can't move themselves or possessions upstairs or they may be staying close to an eroding cliff edge.

HOUSING

Page no. / policy ref.	Comments
Policy H9: Integrating Large Scale Housing Developments with the Local Community	<p>I support this policy:</p> <p>2. "Planning applications for major housing developments should include:</p> <p><i>e) how foul water and surface water runoff generated by the proposal will be managed over the lifetime of the development, including mapping of overland flow routes and how the development will impact on flood risk and river basin management strategies and on the existing foul water drainage network (in particular, with reference to the capacity of the existing combined sewers in the Parish), and the nature and outcome of early-stage consultations with the relevant agencies with flood risk management responsibilities (currently Cornwall Council, the Environment Agency and South West Water) on the avoidance of offsite flood risk."</i></p>
Policy H10: Cornwall Council Adult Social Care Site, Roscadghill Road, Heamoor p.87	<p>1. "Proposals for community-led social housing on the former adult social care site at Roscadghill Road, Heamoor, available to meet local need in perpetuity, will be strongly supported.</p> <p>2. Any development proposals for the site should offer the highest possible standards of energy efficiency and eco-design, and incorporate community food-growing and composting facilities."</p> <p>Please note: Part of this site is in the Fluvial Flood Zone for the Heamoor Stream:</p>  <p>The site is also in an area vulnerable to surface water flooding:</p>

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The encouragement to develop the site for housing needs to consider [NPPF para 159](#): *“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”*

[NPPF para 160](#) states: *“Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources.”*

Where the Local Planning Authority’s [Strategic Flood Risk Assessment](#), or other available flood risk maps or information, indicates that part or parts of a neighbourhood plan area may be at risk of flooding, the qualifying body will need to have regard to the National Planning Policy Framework’s policies on flood risk. Where they are considering proposing development, they should show that this would be consistent with the local planning authority’s application of the [Sequential Test](#) and if necessary, the [Exception Test](#) for the Local Plan.

The policy may need to be reconsidered to reflect the national guidance. The eastern part of the site not at flood risk may be suitable for development, while the vulnerable areas could be reserved for more suitable uses such as flood tolerant habitat/ green space.

The FRA requirements are summarised for quick reference in the table below, but please also refer to the national guidance:

Flood Zone	Category	Technical Definition	National Planning requirement
Flood Zone 1	Low probability	Land having a less than 1 in 1,000 annual probability of river or sea flooding.	<p>A Flood Risk Assessment is required for:</p> <ul style="list-style-type: none"> developments of more than 1 Ha. Developments of less than 1 Ha, including a change of use to a more vulnerable class (e.g. commercial to residential), where they could be affected by sources of flooding other than rivers and the sea (e.g. surface water, reservoirs). <p>Critical Drainage Areas.</p>

Thank you for taking the time to provide comments on the Plan.

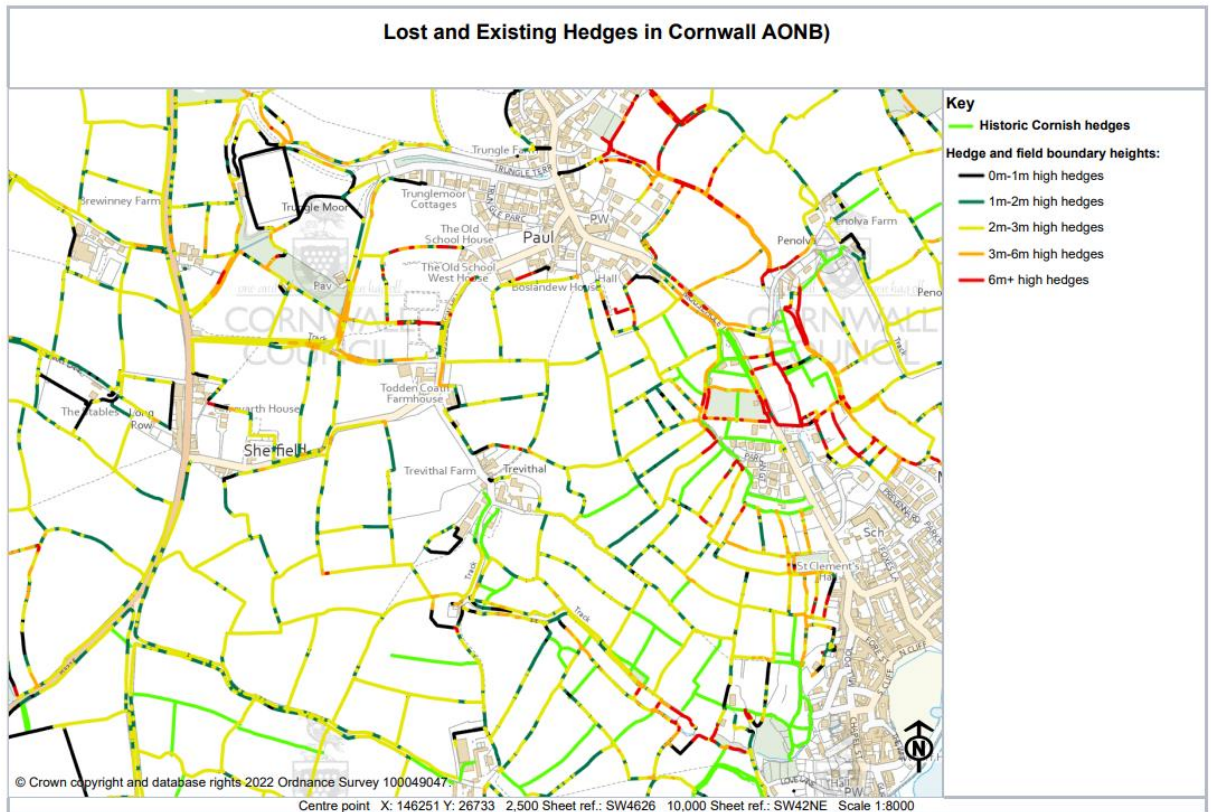
Flood Zone 2	Medium probability	Land having between a 1 in 100 and 1 in 1,000 annual probability (1 - 0.1%) of river flooding; or land having between a 1 in 200 and 1 in 1,000 (0.5 - 0.1%) annual probability of sea flooding.	A Flood Risk Assessment should be provided with any planning application that falls within a Flood Zone 2 area with the exception of some minor developments.
Flood Zone 3a	High probability	Land having a 1 in 100 (>1%) or greater annual probability of river flooding; or Land having a 1 in 200 (>0.5%) or greater annual probability of sea flooding.	All development proposals within this zone should be accompanied by a Flood Risk Assessment.
Flood Zone 3b	Functional floodplain	This zone comprises land where water has to flow or be stored in times of flood. Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency.	All development proposals within this zone should be accompanied by a Flood Risk Assessment.
<p>Since this involves a Main River, please also consult the Environment Agency on this site specific policy with regards to the fluvial flood risk.</p>			

NATURAL ENVIRONMENT AND GREEN INFRASTRUCTURE

Page no. / policy ref.	Comments
<p>Policy GI4: Supporting Biodiversity in New Development</p> <p>p.112</p>	<p><i>Policy GI14: “Proposals for development must incorporate planting and landscaping designed to support wildlife and link to existing biodiversity corridors and sites where feasible. Landscape and planting schemes should use native and/or “climate resilient” species and retain or provide wildlife corridors and “stepping stones” such as Cornish hedges (see policy GI6), hedgerows, ditches, tree planting (see policies GI7 and GI8), green spaces and verges.”</i></p> <p><i>Policy GI8: New Trees and Planting: “..iv) species are planted which are resilient to changes in the climate and local weather patterns (i.e. “climate resilient” species), while reflecting locally occurring species which support a diversity of local ecology (i.e. “native” species);</i></p> <p>I support the reference to climate-resilient species. When it comes to species selection, diversity is the key to resilience. A diverse mix of native and non-native species will help to maintain canopy and habitat connectivity. Many of our native trees are vulnerable to new pests and diseases as well as the damaging impacts of extreme rainfall, heat and drought. Some non-native trees can also act as an alternative host for species that live on vulnerable native trees (e.g. Sycamore as a substitute host for species dependent on Ash). A diverse species list will ensure that the overall canopy and habitat connection is maintained. Landscape character should also be considered when selecting species - native trees are more visually appropriate in rural countryside, whereas a mix of native and non-native species is appropriate in urban areas, gardens and ornamental parks.</p> <p>It’s good to see ditches mentioned as a habitat – they are multifunctional water management features. Natural SuDS and NFM could be added to the list.</p> <p>The NDP could additionally encourage approaches for the long-term management and maintenance of green and blue infrastructure in a way that supports biodiversity (e.g. avoiding excessive grass cutting, locating existing trees and hedges on public land, rotational cutting of hedges, wildlife sensitive maintenance of SUDs features, timing of maintenance). There’s also a potential community ownership or local business opportunity for management of green spaces which could help to educate communities on nature-friendly landscape management. Truro and Kenwyn NDP is a good practice example – see their positive management policy.</p>
<p>Policy GI6: Cornish Hedges</p>	<p>1. <i>“Cornish hedges are a distinctive landscape feature and habitat. Development proposals should protect, retain and enhance all Cornish hedges within and forming the boundaries of the site and any new sections of hedge should reflect local styles. Proposals should demonstrate, through an ecological assessment:</i></p> <p><i>i) how Cornish hedges and their associated vegetation can be sustainably retained within development sites; and,</i></p> <p><i>ii) how Cornish hedges will form a key element within the design of the site’s green infrastructure network.”</i></p> <p>I support the above policy. Justifications include:</p> <ul style="list-style-type: none"> • Established Cornish hedges play an important role in intercepting and channelling surface water, as well as providing shelter and shade in a changing climate. • Maintaining and enhancing habitat connectivity is crucial for enabling plants and animals to move around as they adapt to climate change. • Hedges are better boundaries for storm resilience and biodiversity than fences. <p>Please note, a ‘lost hedges’ layer for the Cornwall AONB has recently been added to Cornwall Council’s intranet mapping system. It enables existing and historic hedge layers to be overlain which can help to identify where restoring a lost hedge would improve habitat connections. Cornish hedges are best placed across rather than down contours to intercept surface water, ideally with an accompanying ditch to channel run-off to a silt trap or attenuation feature. Cornwall Council’s Hedge Group are</p>

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currently working on a resource pack for Cornish hedges which should be available in Spring 2023. The extract below shows the hedge layers for the section of Cornwall AONB at Mousehole:



[Intranet Mapping - Historic and Natural Environment Data \(cornwall.gov.uk\)](http://cornwall.gov.uk)

COASTAL VULNERABILITY

Page no. / policy ref.	Comments
5.5 Coastal Vulnerability 5.5.4	<p>5.5.4 – does the 2nd sentence, CC’s “Shoreline Management Strategy,” mean the “Mounts Bay Coastal Strategy” - not the Shoreline Management Plan?</p> <p>The Shoreline Management Plan (SMP) provides a broad-scale assessment of the risks associated with coastal change. It sets out a long-term policy framework to manage these risks and acts as a strategic planning document that will guide decision making. The SMP seeks to find ways to manage the risks of coastal change in a way that does not tie future generations into costly and unsustainable approaches, while trying to balance potential conflicting interests along the coast.</p> <p>Although the Penzance NDP doesn’t need to duplicate existing policies it would be useful to acknowledge (and if in agreement) support the SMP policy intentions (PU’s) for the Management Areas (MA) 20, 21 and 22 within the Shoreline Management Plan. It will also help with further context for the remainder of section 5.5 within the NDP document and also support the comments given below re CCMA’s and potential designation.</p> <p>Detailed information for SMP MA20 – Long Rock to Penzance can be found here Detailed information for SMP MA21 – Penzance to Newlyn (Albert Pier to Sandy Cove) can be found here Detailed information for SMP MA22 – Mousehole (Sandy Cove breakwater to Point Spaniard) found here</p> <p>I have extracted the most relevant summary sections for info:</p>

Thank you for taking the time to provide comments on the Plan.

Location reference:	Longrock to Penzance
Management Area reference:	MA20
Policy Development Zone:	PDZ8

PREFERRED POLICY TO IMPLEMENT PLAN:	
From present day (0-20 years)	HTL at Longrock; HTL at Eastern Green; HTL at Chyandour
Medium term (20-50 years)	MR at Longrock; MR at Eastern Green; HTL at Chyandour
Long term (50 -100 years)	MR at Longrock; MR at Eastern Green; HTL at Chyandour

SUMMARY OF SPECIFIC POLICIES

Policy Unit		SMP1 Policy 50 yrs	SMP2 Policy Plan			Comment
			2025	2055	2105	
20.1	Longrock	Hold the line	HTL	MR	MR	Identification of most suitable and technically feasible strategy for realignment of transport links is critical in securing future sustainability of the frontage.
20.2	Eastern Green	Hold the line	HTL	MR	MR	Identification of most suitable and technically feasible strategy for realignment of transport links is critical in securing future sustainability of the frontage.
20.3	Chyandour	Hold the line	HTL	HTL	HTL	Holding the line at Chyandour will provide control point to east of Penzance Harbour and provide defence to main route into the town, plus assist in minimizing impacts on Gulval.
Key: HTL - Hold the Line, A - Advance the Line, NAI – No Active Intervention MR – Managed Realignment						

Location reference:	Penzance and Newlyn (Albert Pier to Sandy Cove)
Management Area reference:	MA21
Policy Development Zone:	PDZ8

PREFERRED POLICY TO IMPLEMENT PLAN:	
From present day (0-20 years)	HTL at Penzance Harbour; HTL at Wherry Town; HTL at Newlyn; NAI at Sandy Cove.
Medium term (20-50 years)	HTL at Penzance Harbour; MR at Wherry Town; HTL at Newlyn; NAI at Sandy Cove.
Long term (50 -100 years)	HTL at Penzance Harbour; MR at Wherry Town; HTL at Newlyn; NAI at Sandy Cove.

SUMMARY OF SPECIFIC POLICIES

Policy Unit		SMP1 Policy 50 yrs	SMP2 Policy Plan			Comment
			2025	2055	2105	
21.1	Penzance Harbour & Docks	Hold the line	HTL	HTL	HTL	Harbour & docks integral to Penzance economic well-being. This PU is located upon prominent outcrop of slate which provides natural resistance.
21.2	Wherry Town	Hold the line	HTL	MR	MR	Loss & narrowing of foreshore linked to overtopping and damage of promenade and loss of amenity benefits, tourism etc. Realignment of defensive line, or possible offshore structures to build width and encourage sand retention, detailed strategy should consider possible solutions, to be taken forward as soon as possible.
21.3	Newlyn	Hold the line	HTL	HTL	HTL	Harbour central to Newlyn economy and linked closely to Penzance and Mousehole. Also located adjacent to outcropping slate geology, providing more natural resistance.
21.4	Sandy Cove	Hold the line	NAI	NAI	NAI	Does not preclude local management as part of regeneration strategy for Newlyn
Key: HTL - Hold the Line, A - Advance the Line, NAI – No Active Intervention MR – Managed Realignment						

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Location reference:	Mousehole (Sandy Cove breakwater to Point Spaniard)
Management Area reference:	MA22
Policy Development Zone:	PDZ8

PREFERRED POLICY TO IMPLEMENT PLAN:	
From present day (0-20 years)	HTL along Cliff Road. HTL at Mousehole.
Medium term (20-50 years)	HTL along Cliff Road. HTL at Mousehole.
Long term (50 -100 years)	HTL along Cliff Road. HTL at Mousehole.

SUMMARY OF SPECIFIC POLICIES

Policy Unit		SMP1 Policy	SMP2 Policy Plan			Comment
		50 yrs	2025	2055	2105	
22.1	Cliff Road	Hold the line	HTL	HTL	HTL	Frontage is much less vulnerable and shoreline more sustainable to maintain in current position. Therefore no change from SMP1 policy.
22.2	Mousehole	Hold the line	HTL	HTL	HTL	Resistant geology and topography means little recession under NAI, but risks to heritage increase under NAI if harbour not maintained, so the WPM scenario is preferred, implemented through continuing current HTL set by SMP1. Resistant shoreline makes it much more sustainable to implement HTL, in line with Newlyn Harbour and Penzance Harbour. Therefore no change from SMP1 policy.
Key: HTL - Hold the Line, A - Advance the Line, NAI – No Active Intervention MR – Managed Realignment						

No active intervention (NAI):	A decision not to invest in providing or maintaining defences or natural coastline.
Hold the line (HTL):	Maintain or upgrade the level of protection provided by defences or natural coastline.
Managed realignment (MR):	Manage the coastal processes to realign the 'natural' coastline configuration, either seaward or landward, in order to create a future sustainable shoreline position.
Advance the line (ATL):	Build new defences seaward of the existing defence line where significant land reclamation is considered.

The Mounts Bay Coastal Strategy is being developed to implement those Shoreline Management Policies on a much more detailed and technical level. It is also as the document states being developed in support of the vision set out in the NDP. Some further contextual information below

Cornwall Council have been working collaboratively with the Environment Agency and other partners such as Natural England in developing a coastal strategy for the Mounts Bay area with the aim of ensuring the area is adaptive and resilient to flood and coastal erosion now and into the future. The area of the strategy extends from Marazion through to Mousehole, including the frontage of Longrock and Eastern Green, Penzance Harbour area, the Penzance Promenade through to Tolcarne and the area of Newlyn.

The work draws upon and draws together a substantial amount of work undertaken by the Council and the Environment Agency, as well as undertaking further detailed analysis of other local areas, bringing the understanding of flood and coastal erosion risk management (FCERM) issue up to a consistent level over the whole area.

While the Strategy focusses on delivery of an FCERM strategy, from the start of the work it was recognised that there were other important aspects that needed to be considered, in terms of:

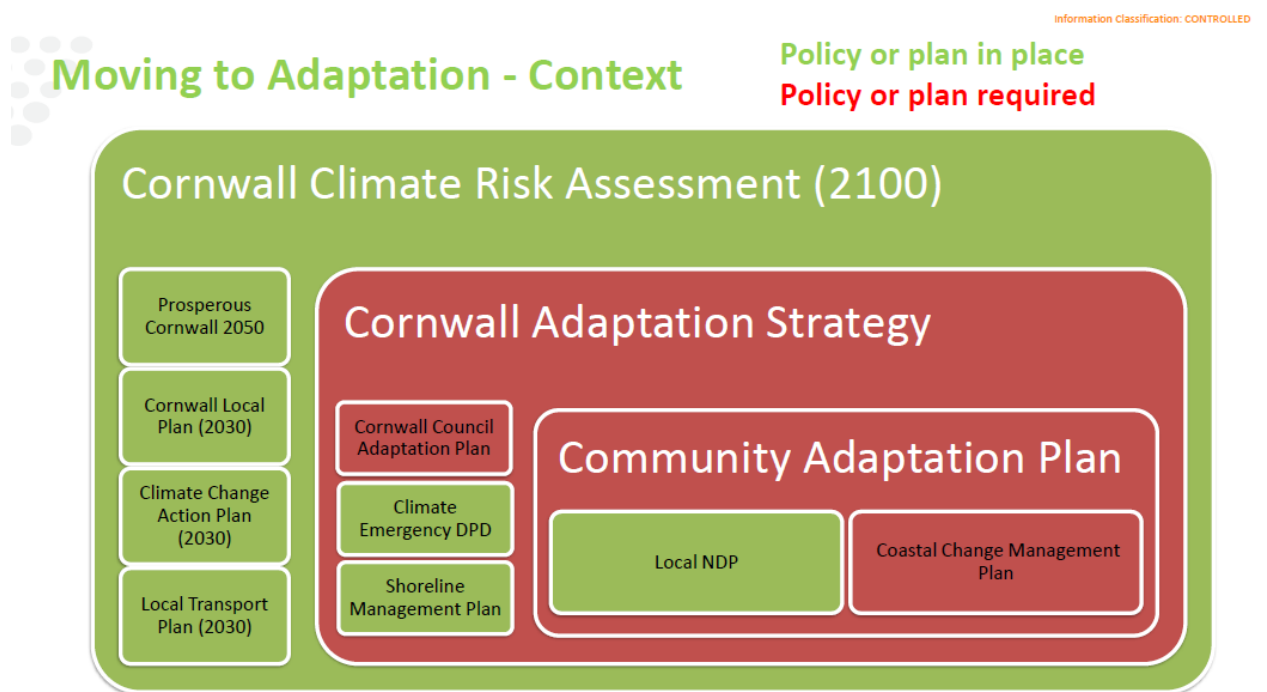
Thank you for taking the time to provide comments on the Plan.

- The Place Making initiative and Neighbourhood Planning Process
- The natural environment, particularly with reference to designated habitats such as Marazion Marsh and the Marine Conservation Zone (MCZ).
- Development and regeneration initiatives in relation to the two main Harbours
- The historic environment, particularly with reference to Conservation Areas and designated heritage assets

The Strategy is underpinned by the Local Flood Risk Management Strategy, Cornwall’s Environmental Growth Strategy and recognises Cornwall’s Strategic Economic Plan, alongside other national policy and legislation. The Strategy build forward from the findings of the Shoreline Management Plan (SMP).

The Strategy is currently in draft form and this Briefing Note aims to bring before the Council the main conclusions arising from the work, prior to wider consultation and engagement.

Following production of the Cornwall Climate Risk Assessment, Cornwall Council is also current in the process of developing an Adaptation Strategy which will set out how communities can be resilient to change. Although still in development the Adaptation Strategy will set out the need for Community Adaptation Plans, to ensure our communities are prepared for a changing climate. The below infographic aims to set out how this work will sit in the context of the NDP. Further info will be provided once more progress has been made with the development of the Adaptation Strategy.



5.5 Coastal Vulnerability

Coastal Erosion Risk

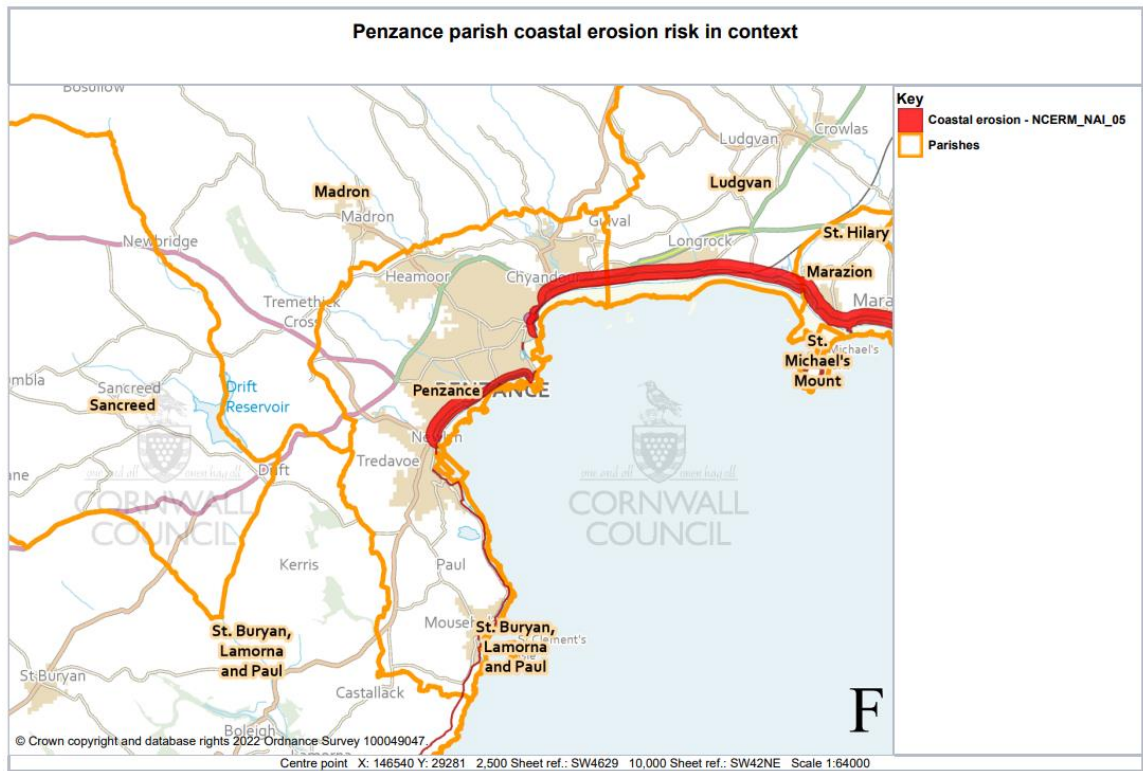
5.5.5

“Mapping of the two areas identified (MA 20 and MA 21) is provided in Appendix 14.”

p.122 Last sentence

Appendix 14 shows the risk of *flooding* from rivers and the sea. The reference should be to Appendix 13 Coastal Vulnerability Mapping.

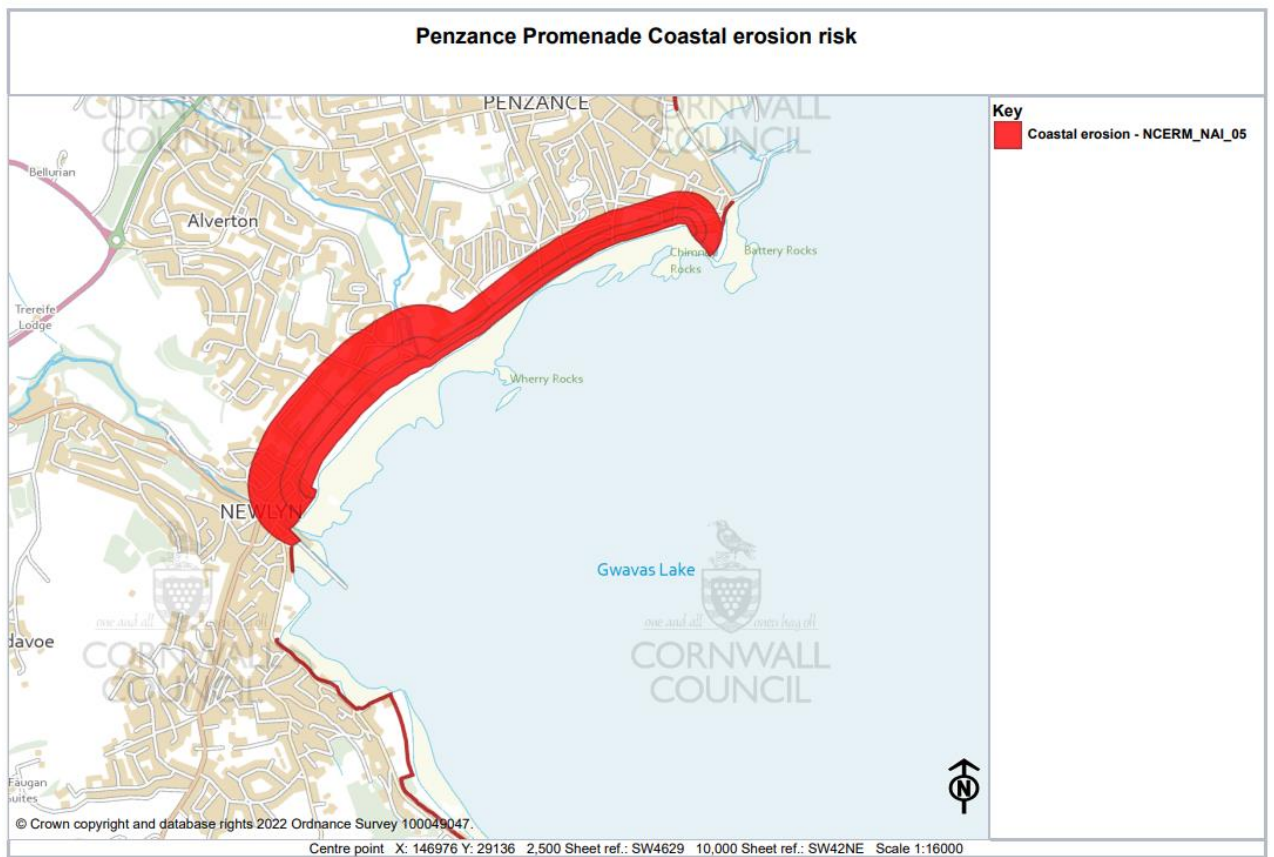
Appendix 13 just shows where the SMP policy units are. Maps showing the projected coastal erosion risk are provided below and can be obtained from the [CC intranet mapping](#) or the [SFRA map](#):



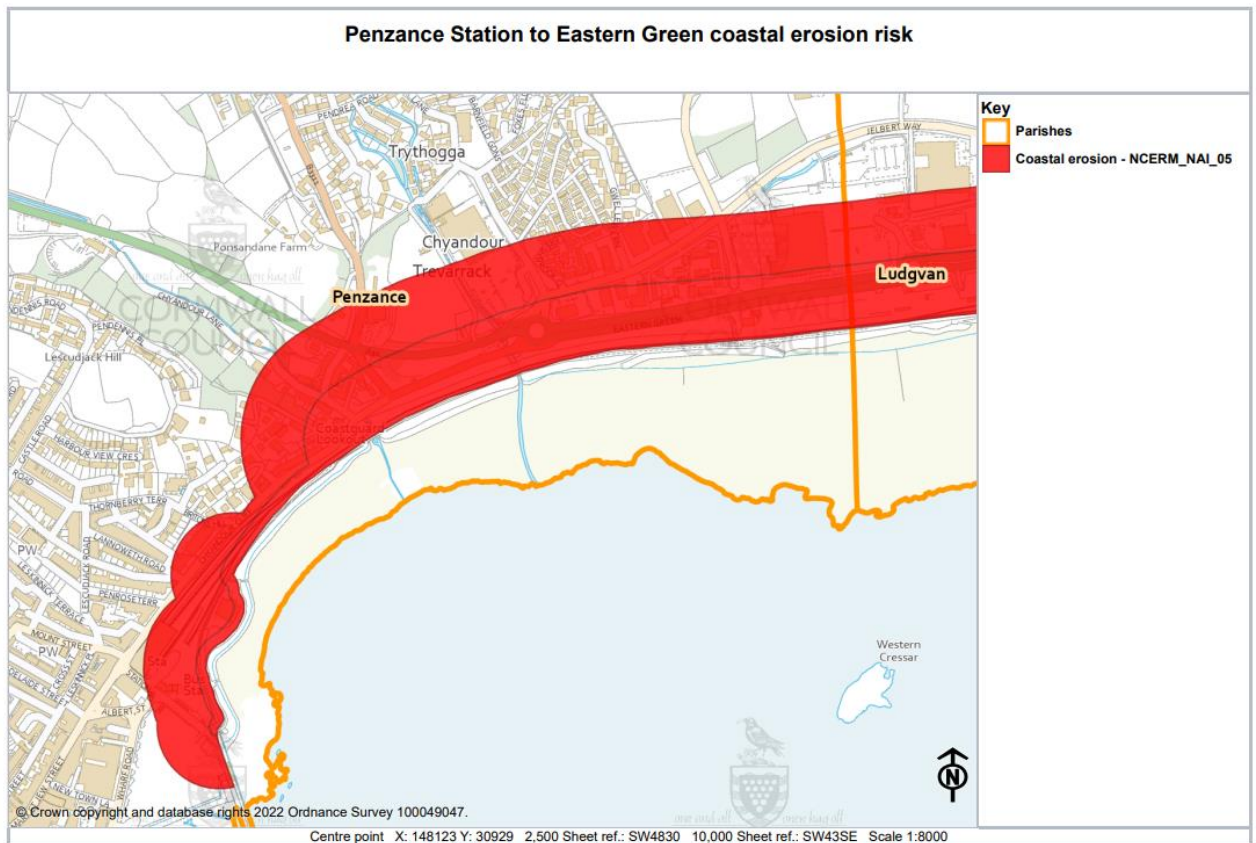
Following the precautionary principle, the **NCERM_NAI_05** layer is applied for planning purposes.

- NCERM = National Coastal Erosion Risk Mapping.
- NAI = No Active Intervention scenario
- 05 = 5% probability scenario (1 in 20 chance of being exceeded)

The three layers in the red area on the map extract below show the erosion estimates for the Short Term (20 years), Medium Term (50 years) and Long Term (100 years).



Thank you for taking the time to provide comments on the Plan.



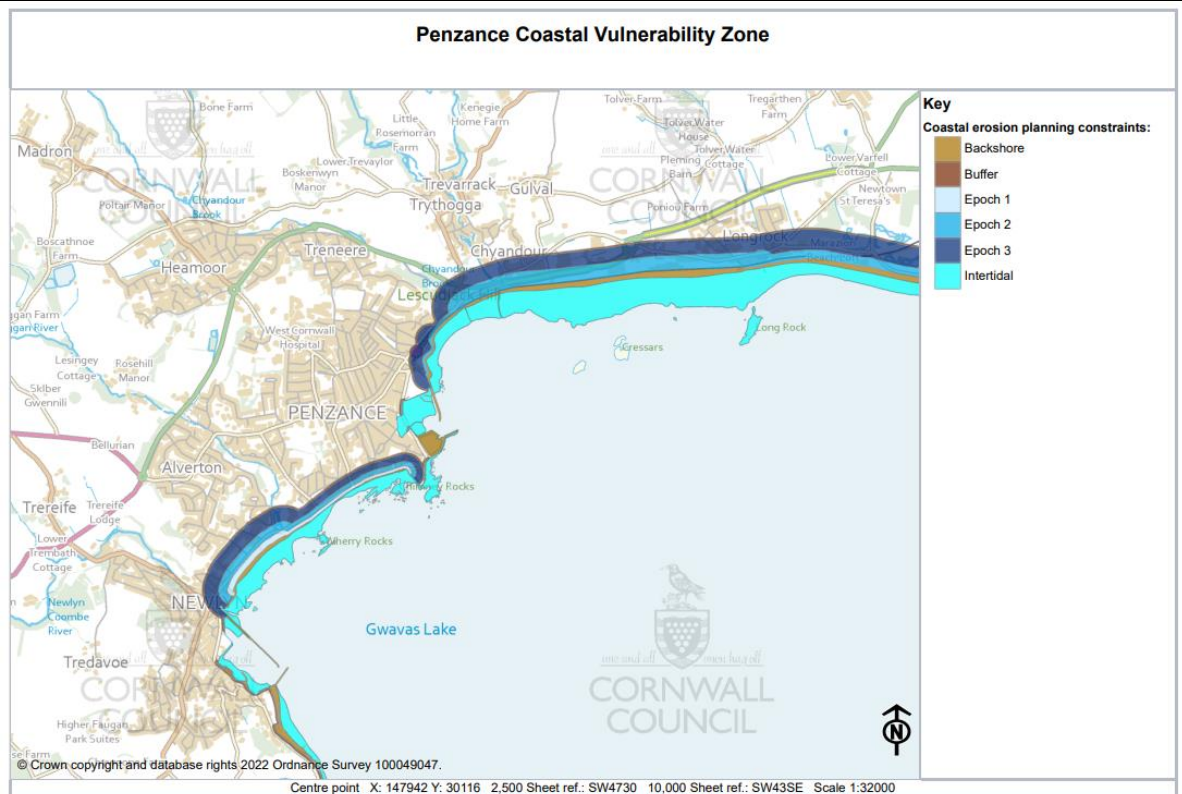
The Eastern Green section doesn't show three lines for the three epochs because there's no projected erosion in the Short Term. The seaward edge of the projected erosion line starts from Epoch 2 (2025-2055). Currently the sea wall is providing some defence – this NAI projection shows what would happen if the existing defences fail.

Please note the NCERM line is currently being reviewed and some updates to policy units are anticipated.

5.5 Coastal Vulnerability

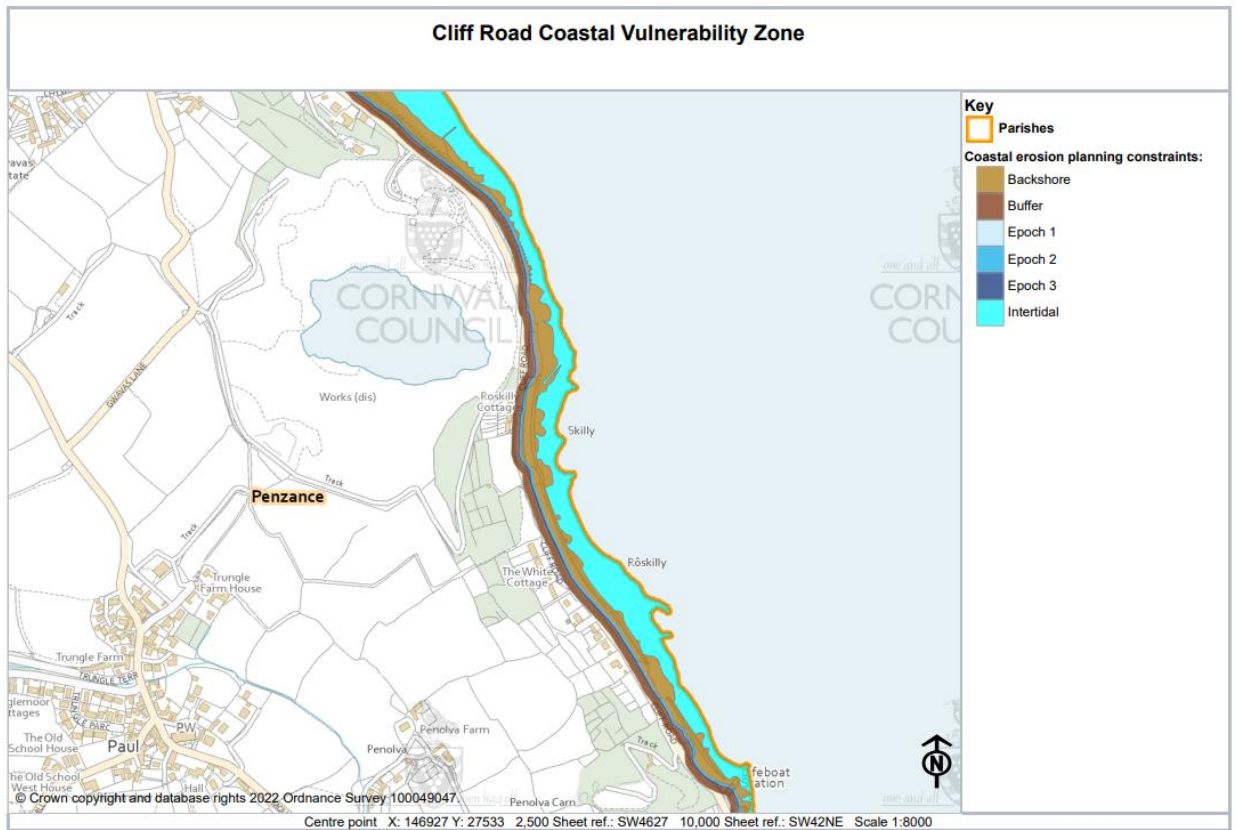
Coastal Vulnerability Zone

For Planning purposes, a Coastal Erosion Vulnerability Zone (CVZ) has been mapped along the coast of Cornwall using the NCERM_NAI_05 Long Term scenario plus a 10m precautionary buffer. Planning policies for development in this zone are included in the draft Climate Emergency DPD. Whilst the Penzance NDP doesn't need to repeat the DPD policies it can play a useful role in making planning applicants aware of the CVZ along the parish's frontage to give them advance warning that additional planning requirements will apply (such as the need for a Coastal Vulnerability Assessment). The NDP can also raise awareness of any local difference between the CVZ and CCMA boundaries. The SFRA map extract below shows where the CVZ is for Penzance parish:

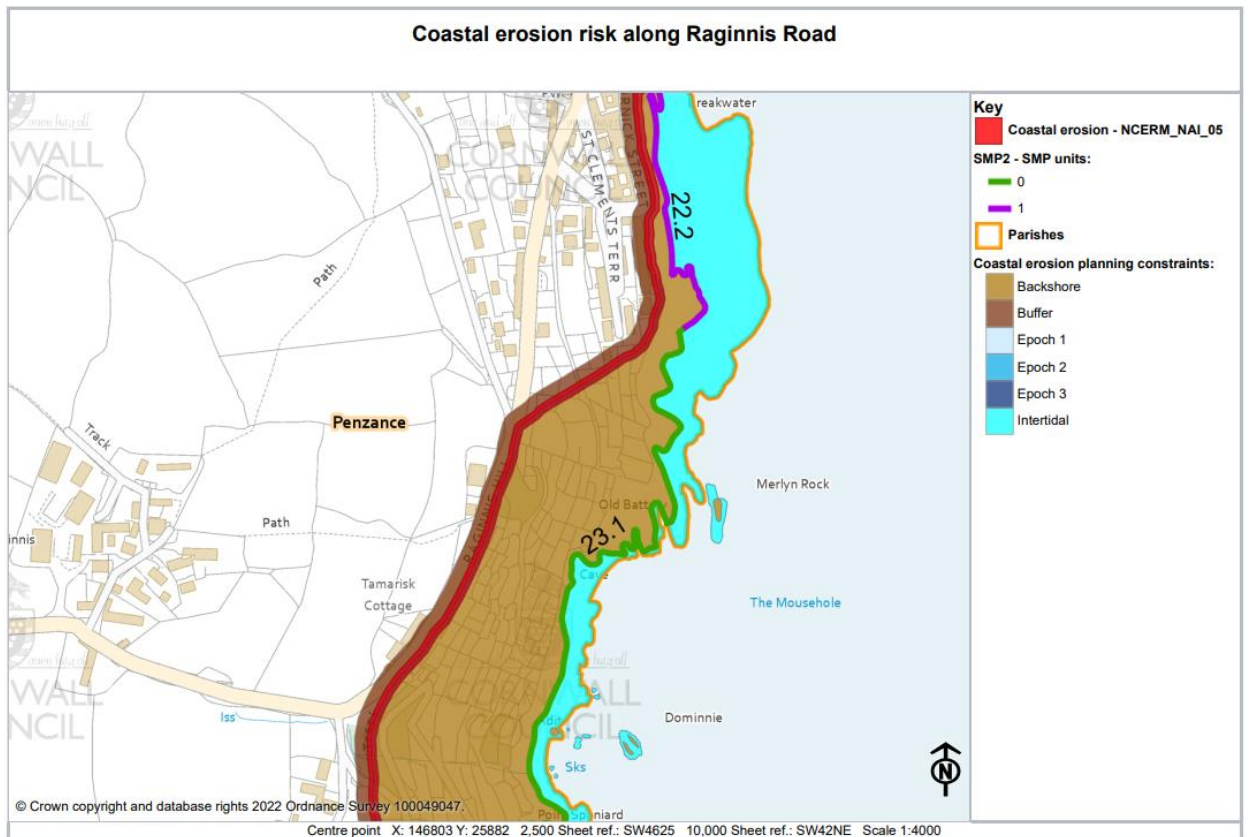


[Intranet Mapping - Historic and Natural Environment Data \(cornwall.gov.uk\)](https://www.cornwall.gov.uk) or [Strategic Flood Risk Assessment \(cornwall.gov.uk\)](https://www.cornwall.gov.uk)

Note: The coastal road and path between Newlyn and Mousehole is within the CVZ for much of its length. Caution should be exercised when considering any development proposals along this road since there is a risk that their access could become cut off within the 100-year lifetime of new homes. The road will prevent the *Maritime Cliff and Slope* BAP habitat from retreating inland as erosion progresses, potentially interrupting the connectivity of this priority habitat. The SMP recommends a Hold the Line policy intent along this policy unit but the cost-benefit for FDGiA is low. A parish-wide CCMA could include a plan for how HTL will be funded and delivered here, also how the shrinking BAP habitat could be saved by making it part of the solution.



On the southern side of Mousehole, Raginnis Road is in the CVZ and one property is seaward of the erosion line. The SMP policy at this point (PU 23.1) is NAI. Access to properties served by the road and one property could be lost as coastal erosion progresses. An adaptation plan will be needed for these properties and the road.



Thank you for taking the time to provide comments on the Plan.

<p>5.5 Coastal Vulnerability</p> <p>5.5.5 Statement of Support CCMAAs</p>	<p><u>Coastal Change Management Areas</u></p> <p>NDPs must be consistent with other national and local planning policies, such as:</p> <p><i>NPPF para 171: “Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and:</i></p> <p><i>(a) be clear as to what development will be appropriate in such areas and in what circumstances; and</i></p> <p><i>(b) make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas.”</i></p> <p>a) The draft Cornwall Climate Emergency DPD already provides Cornwall-wide policies for what constitutes appropriate development in a CCMA. The draft Penzance NDP helpfully signposts to this document. Recently updated national planning guidance provides further detail on appropriate development in a CCMA: Flood risk and coastal change - GOV.UK (www.gov.uk)</p> <p>b) Decisions about relocation or adaptation of infrastructure and managed realignment will need to be made more locally. This will be part of the process of designating a CCMA and developing a Coastal Change Management Plan.</p> <p>Recently updated National Planning Policy Guidance para 70 clarifies when a CCMA should be designated:</p> <p><i>“A Coastal Change Management Area will only need to be defined where rates of shoreline change are expected to be significant over the next 100 years, taking account of climate change. They will not normally need to be defined where the accepted shoreline management plan policy is to hold or advance the line (maintain existing, or build new flood and coastal erosion risk management infrastructure) for the whole period covered by the shoreline management plan, subject to evidence of how this may be secured, taking advice from the Environment Agency. A Coastal Change Management Area should be defined where the shoreline management plan policy is anything other than hold or advance the line at any time during its plan period. In addition, where there is uncertainty about securing funding for the implementation of hold or advance the line policies, local planning authorities can still identify areas that could be affected by coastal change to ensure prospective developers are made aware of the potential risks and inappropriate development is avoided.”</i></p> <p>Section 5.5.5 of Penzance NDP notes that MA21 isn’t identified as a candidate CCMA in the draft Cornwall Climate Emergency DPD despite having significant assets at risk from coastal erosion and flooding. The “candidate” areas highlighted in the DPD are those which are considered a priority because a Coastal Change Management Plan is needed in the Short and Medium Term (Epoch 1: 2005 to 2025 and Epoch 2: 2025 to 2055). The list in the DPD isn’t exhaustive and other candidate CCMAAs may be identified through appropriate evidence. I agree with the Penzance NDP team that MA21 should be designated as a CCMA along with MA20. Designating the whole parish as a CCMA would be the most practical and inclusive approach to take whilst the local adaptation response is being developed.</p> <p>In MA21, policy unit 21.2 (Wherrytown) has a Managed Realignment (MR) policy from Epoch 2. The SMP identifies:</p> <p><i>“Loss & narrowing of foreshore linked to overtopping and damage of promenade and loss of amenity benefits, tourism etc. Realignment of defensive line, or possible offshore structures to build width and encourage sand retention, detailed strategy should consider possible solutions, to be taken forward as soon as possible.”</i></p> <p>“Managed Realignment” means managing the coastal processes to realign the ‘natural’ coastline configuration, either seaward or landward, in order to create a future sustainable shoreline position. This does not mean abandoning the area but seeking a softer engineering solution to manage coastal change without building hard structures that would likely have an adverse impact on the adjacent coastline or the</p>
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Thank you for taking the time to provide comments on the Plan.

nature of the coast. For MA20 and MA 21 this could be achieved through a number of means, yet to be decided, such as submerged breakwaters, modifying the sea wall, beach recharge, naturalization of the seafront gardens and/or sand scaping.

The Managed Realignment policy at Wherrytown, the need for imminent action and incomplete funding package supports the case for designating a CCMA along this vulnerable frontage.

CCMA Boundary

In the absence of national guidance, designating the boundary of the CCMA should be done in consultation with the Coast Protection Authority (Cornwall Council ERA Team), the EA and the LPA. When it comes to designating a CCMA zone the boundary should consider if land elsewhere in the parish needs to be safeguarded for roll-back of properties, infrastructure, paths, roads, green space, habitat etc. For this reason, the CCMA could have a different boundary to the CVZ which focuses policy solely on where the erosion risk is anticipated.

CCMA Policies

Designating a CCMA means a long-term adaptation plan will be needed for this area and additional planning policies and guidance would apply, as stated in [NPPF para 172](#):

“Development in a Coastal Change Management Area will be appropriate only where it is demonstrated that:

- (a) it will be safe over its planned lifetime and not have an unacceptable impact on coastal change;*
- (b) the character of the coast including designations is not compromised;*
- (c) the development provides wider sustainability benefits; and*
- (d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast [57](#) .*

The draft [Cornwall Climate Emergency DPD](#) Policy CC2 includes additional policies for CCMA covering the relocation of property where an adaptation plan hasn't yet been adopted. This is where designating the whole parish as a CCMA would provide flexibility at this stage.

I note the coastal erosion section of the Penzance NDP doesn't include any policies. Whilst NDPs shouldn't repeat other existing policies (e.g. NPPF, Local Plan, CE DPD), they present an opportunity to provide further detail or make changes to how those policies are interpreted, providing they don't ignore them or completely change their purpose.

Recommendation

The group may wish to consider including more specific coastal resilience and adaptation policies which reflect local aspirations, needs and issues. Examples of what NDPs can add with regards to coastal erosion risk include:

- Designate relevant parts of the parish or the whole parish as a CCMA. Designating the whole parish is recommended because coastal access and adaptation affects the whole community and this will provide spatial flexibility prior to a Coastal Change Management Plan being developed.
- Raise awareness and sign-post to the SMP and Climate Emergency DPD policies. This will help planning applicants to avoid spending time developing unsustainable proposals and to plan for any additional requirements like a Coastal Vulnerability Assessment.
- Avoid allocating sites for housing within the CVZ where the SMP policy is NAI, or where HTL or MR is unlikely to be funded. Be aware that whilst the NDP covers the period up to 2030, the lifetime of homes built during that period will extend into the period covered by the 100-year NCERM erosion line.
- Safeguard land for roll-back if needed (consider the need for future inland relocation of vulnerable buildings, infrastructure, coastal paths, public spaces, habitats, car parks etc.). For instance, the

	<p>SMP policy table for 20.2 (Eastern Green) recommends: <i>“Identification of most suitable and technically feasible strategy for realignment of transport links is critical in securing future sustainability of the frontage.”</i></p> <ul style="list-style-type: none"> • Include policies supporting development that makes the shoreline more resilient to coastal erosion where the SMP policy is HTL or MR, providing they are consistent with the SMP and Climate Emergency DPD policies. This would be a helpful ‘material consideration’ to have when future coastal adaptation schemes are submitted for planning. • Encourage coastal resilience solutions that work with natural processes, use nature-based solutions and/or hybrid combinations of hard and soft engineering as appropriate. • Encourage multi-benefit coastal resilience and adaptation solutions (e.g. improved public access, biodiversity gains, carbon sequestration, heritage awareness, economic opportunities, health benefits etc.). <p>References</p> <p>Flood risk and coastal change - GOV.UK (www.gov.uk) – updated August 2022</p> <p>NPPF: What is Integrated Coastal Management?</p> <p>National Planning Policy Framework - 14. Meeting the challenge of climate change, flooding and coastal change - Guidance - GOV.UK (www.gov.uk)</p> <p>NPPF: How can neighbourhood plans take account of coastal change?</p> <p>Climate Change and Neighbourhood Plans (cornwall.gov.uk)</p> <p>Planning for coastal change (cornwall.gov.uk) – Chief Planning Officer’s Advice Note</p> <p>Working with natural processes to reduce flood risk - GOV.UK (www.gov.uk)</p> <p>Living On The Edge a Cornwall Climate Care documentary</p>
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PENZANCE TOWN CENTRE AND WATERFRONT

Page no. / policy ref.	Comments
p.137	<p><u>PEN9: Vitality of the Promenade</u> <u>PEN10: Mount’s Bay Linear Park</u></p> <p>Considering the coastal erosion pressures on this frontage, I suggest the policy also supports developments which strengthen the sustainability of the promenade and linear park.</p>

NEWLYN

Page no. / policy ref.	Comments
p.146 Newlyn Public Realm Plan	<p><u>Policy NEW2: Stable Hobba and Sandy Cove Park and Walk / Cycle Hubs</u> Much of the Sandy Cove Park and Walk site is in Flood Zone 3 and part of the cycleway is seaward of the NCERM line. The SMP policy at this site (PU 21.4) is NAI. I suggest including a policy that any development in this area should be consistent with the policies in the latest version of the SMP. Please consult the EA on the Flood Zone 3 risk.</p> <p><u>Policy NEW7: Enhancements at Newlyn Green</u> This green is in the CVZ for Epoch 1. The aspirations for this site should be compatible with the Managed Realignment approach for this frontage once known. I suggest including a policy that any development in this area should be consistent with the policies in the latest version of the SMP and pays due regard to the advice in the Mounts Bay Coastal Strategy and proposed Coastal Change Management Plan.</p> <p>The draft Mounts Bay Coastal Strategy advises that there is difficulty in justifying full defence across the Foster Bolitho Gardens area. The recommendation in this area is to develop a more adaptive approach, setting defences back and allowing greater width between areas of open space and the development of a natural area of beach.</p>

Thank you for taking the time to provide comments on the Plan.

OTHER / GENERAL COMMENTS**Comments****Replacement Dwellings**

The NDP team may wish to consider including a policy for replacement dwellings to address the issue of gardens being replaced with hard surfacing for parking. This increases surface water run-off and reduces habitat connectivity. A suggested policy could be: *“Replacement dwellings will be supported where they maintain and preferably enhance habitat connectivity and flood management by retaining trees and green corridors and using permeable surfaces.*

Existing Buildings

The NDP may wish to consider including a policy to strengthen the resilience of existing buildings in areas at flood risk. For example: *“Alterations to existing buildings in the areas at flood risk should be designed to reduce the risk of flooding and enable faster recovery from flooding, for instance by including property flood resilience measures like raised sockets and appliances and solid tiled floors.”*

See: [Property Flood Resilience PFR - BeFloodReady](#)

See: [Property Flood Resilience - Cornwall Council](#)

[Flood risk and coastal change - GOV.UK \(www.gov.uk\)](#)