

Strategic Environmental Assessment for the Penzance Neighbourhood Plan

Environmental Report Addendum

Penzance Town Council

November 2023

Quality information

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1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of Penzance's emerging Neighbourhood Plan.
- 1.2 The Penzance 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 Regulation 14 consultation on the Penzance Neighbourhood Plan was undertaken between November and December 2022.¹ This was accompanied by an SEA Environmental Report² which was prepared as the main output of the SEA process. This presented an appraisal of the draft plan and reasonable alternatives and was prepared to meet the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.4 Since that time, updates have been made to the Neighbourhood Plan to reflect comments received at Regulation 14 consultation.

Purpose of this document

- 1.5 This Environmental Report Addendum considers the implications of the updates to the Neighbourhood Plan for the SEA findings previously presented. This includes relating to the potential for any significant effects that may arise as part of the updates.
- 1.6 Following a review of the representations received at Regulation 14 consultation, this Environmental Report Addendum also provides additional information with respect to the heritage sensitivities at key locations within the neighbourhood area. This information is presented in **Appendix A**.
- 1.7 The Addendum should be read alongside the SEA Environmental Report published in November 2022 which accompanied Regulation 14 consultation.

¹ Penzance Town Council (December 2022) Penzance Neighbourhood Plan 2021-2030, Pre-Submission Consultation Version.

² AECOM (November 2022) Strategic Environmental Assessment for the Penzance Neighbourhood Plan, Environmental Report to accompany Regulation 14 consultation on the Neighbourhood Plan.

2. Appraising the updates to the Neighbourhood Plan

Methodology

- 2.1 The updates to the Penzance Neighbourhood Plan have been screened for likely significant effects. The purpose of this screening exercise is to establish whether the proposed updates are likely to lead to significant effects in relation to the findings previously presented in the Environmental Report, which should then be appraised in more detail.
- 2.2 The focus of the screening is on the proposed updates to the Penzance Neighbourhood Plan; however, explicit consideration is also given to the effects of the Penzance Neighbourhood Plan as updated (i.e., the cumulative effects of the updates and the rest of the Penzance Neighbourhood Plan as submitted).

Findings of the screening exercise

- 2.3 The following table presents the findings of the screening of the updates to the Penzance Neighbourhood Plan.

Table 2.1: Screening the updates made to the Neighbourhood Plan

Update (Policy ref.)	Focus (changes in relation to...)	Screened in?	Rationale
Policy EC9	New policy within the submission version of the Neighbourhood Plan which focuses on supporting the creative, arts and cultural sectors in the neighbourhood area.	No	The changes do not constitute a change in the overall aim and focus of the wider Neighbourhood Plan policies and do not impact on the overall strategy. As such, no further additional effects are anticipated which should be considered in more detail.
Policy H3	New policy within the submission version of the Neighbourhood Plan which responds to the growing issues posed by housing stock being lost to second homes and holiday lets.	No	The changes provide greater clarity to the issues, but do not constitute a change in the overall aim and focus of the wider Neighbourhood Plan policies and overall strategy. As such, no further additional effects are anticipated.
Policies DDH6, GI4, GI7, PEN11, NEW15, and NEW16	The updates comprise revisions to policy numbering and/or naming, primarily as a result of wider policy deletions or combining policies together (e.g., those which have a similar focus).	No	The revisions do not comprise any significant changes to the overall aim and focus of the policies.
Policy DDH2	Inclusion of additional text to strengthen the policy focus on the protection of heritage assets within the neighbourhood area.	No	The change does not comprise a significant change to the overall aim and focus of the policy but will likely enhance the potential longer term positive effects identified for the historic environment.

Policy NEW12	Removal of the policy as the area at 'The Fradgan' has since received planning permission.	No	The policy has been removed from the proposed submission version of the Neighbourhood Plan. Whilst this is a substantive change, the likelihood of significant effects resulting from the Neighbourhood Plan are now minimised as a result. Therefore, no further additional effects are anticipated which should be considered in more detail.
Policies PEN7 - 10, NEW6, and NEW8 - 11	Inclusion of additional text to strengthen the policy focus on the protection of heritage assets and areas within the neighbourhood area, addressing Historic England's Regulation 14 consultation response. Specifically with respect to how any proposed development might avoid or mitigate potential harm to the historic environment.	No	The changes do not constitute a change in the overall aim and focus of the wider Neighbourhood Plan policies and do not impact on the overall strategy. Further consideration of the heritage sensitivities at key locations within the neighbourhood area (including those identified in these policies) is provided in Appendix A of this Environmental Report Addendum.

Screening conclusions

- 2.1 The SEA Regulations require the SEA process to identify, describe and evaluate the likely significant effects of the Penzance Neighbourhood Plan and alternatives.
- 2.2 The screening of the updates has not identified further likely significant effects that should be explored by the SEA process through more detailed appraisal.
- 2.3 For this reason, the SEA Environmental Report which was prepared for (and accompanied) Regulation 14 consultation has been submitted with the Neighbourhood Plan alongside this Environmental Report Addendum.
- 2.4 In light of the above, in association with the requirements of the SEA Regulations, further detailed assessment work is not required to explore the implications of the updates to the Penzance Neighbourhood Plan.

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Appendix A Heritage Assessments

Introduction

Although the Neighbourhood Plan isn't allocating specific sites for housing development, it does identify key locations (by name) which are supported (in principle) or recommended for mixed-use, commercial, or urban realm development.

Under the assumption that speculative applications for new development at these locations may come forward during the Neighbourhood Plan period, Historic England suggested through consultation that in light of the historic sensitivities associated with these key locations, the historic environment evidence base for the Neighbourhood Plan could be augmented.

The locations are as follows:

- **Policy H11:** Cornwall Council Adult Social Care Site.
- **Policy PEN4:** Core Town Centre Retail Zone (Heart of the Town Centre).
- **Policy PEN5:** Town Centre Mixed-use Development and Conversion of Retail and other Town Centre Uses.
- **Policy PEN7:** Harbour and Headland.
- **Policy PEN8:** Harbour Car Park.
- **Policy PEN9:** Vitality of the Promenade.
- **Policy PEN10:** Mounts Bay Linear Park.
- **Policy NEW3:** Access to the South Pier and Observatory.
- **Policy NEW6:** The Old Bottle Top Factory.
- **Policy NEW8:** Penlee Quarry.
- **Policy NEW9:** The Heritage Harbour (Old Quay).
- **Policy NEW10:** The Village Square.
- **Policy NEW11:** The Old Iceworks; and
- **Policy NEW13:** The Seafood Training Hub Facility.

Informed by Historic England's [Guidance on Site Allocations](#), the assessments³ for the key locations in the tables below consider the following:

- The potential heritage asset(s) and area(s) that could be impacted by any new development proposals which may come forward during the plan period (within an approximate 100m radius surrounding the policy area).
- The contribution of the policy area to the significance of the historic environment, and
- The potential impact of development on the significance of the historic environment.

³ With reference to the steps within the 'Site Selection Methodology' table in Historic England's Guidance on Site Allocations document (see Page 5).

Policy H11: Cornwall Council Adult Social Care Site

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
<p>Grade II Nancealverne Lodge: this early 19th century lodge has two storeys at the rear and a single storey at the front, with a slate roof with wide eaves. It has a small wooden porch, and a later wing has been constructed.</p>	<p>This listed building is approximately 55m to the east of the policy area. It is at a similar elevation to the policy area, however it is likely to be screened from view due to the presence of vegetation along the A30. As such, views to and from this listed building in the direction of the policy area are unlikely to be impacted if development came forward for this site.</p>	<p>Development of this policy area is unlikely to have any significant impacts. As such, no adverse impacts are expected to occur for this asset of medium significance.</p>

Policy PEN4 and PEN5: Core Town Centre Areas

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
<p>Grade I Market Building: built in 1837, this is a large building constructed from granite ashlar. It is two storeys in height, with a lead-covered dome and octagonal lantern, and a drum with alternating twin Tuscan columns.</p>	<p>This listed building is within the centre of both policy areas. Given its location within Penzance, and its elevation, it is likely to contribute to a number of views within the town centre environment. Development through policies PEN4 and PEN5 could impact upon its setting, through promoting development at the street level. However, policy PEN4 indicates development would be supported where the design respects the historic character of the area, specifically the setting of this feature. This is reiterated in policy PEN5. As such, adverse impacts are not expected to come forward through these policies. Rather, positive impacts could come forward for this feature due to improvements to the setting, linked to considerate development.</p>	<p>Development of these policies would have a minor positive impact on an asset of medium significance.</p>

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
These policy areas cover the town centre environment of Penzance. Given this, they include a number of historic environment features, such as listed buildings, and the Penzance Conservation Area.	These policies focus on protecting and retaining the status of the Penzance town centre environment whilst allowing for appropriate development. This includes ensuring the historic environment is considered through new development – for example, ensuring designs respect historic character and appearance. This is seen as a positive impact for the historic environment features within and in proximity to these policy areas, as new structures will be in keeping with the existing historic character. New development would also encourage the local community to engage with the historic environment – improving the appreciation and understanding of local heritage. However, new development could also result in a slight increase in pressure upon heritage assets – though it is considered this would be negligible.	Development of this policy area would have a medium positive impact on historic environment assets within and in proximity.

Policy PEN7: Harbour and Headland

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
Penzance Conservation Area: this designation covers the historic urban area. It is a complex area of development due to numerous and varying archaeological and historical influences. It includes medieval built form, the working	This policy area overlaps with three historic character areas within the Penzance Conservation Area: the Harbour and Railway, the Barbican, and the Promenade. <u>The Harbour and Railway</u> This historic character area covers the northern part of the policy area. There has been a port in Penzance since the Middle Ages at the earliest, however during the 19 th century the harbour as it is today started to take shape. The harbour area is built on largely	Development in this policy area is likely to encourage a greater level of activity, linked to redevelopment of buildings (as well as replacement buildings) for hospitality, leisure and other uses. Given that there is likely to be a level of screening from the parts of the Penzance Conservation Area that are removed from this policy area (linked to existing development), the impact on the designation as a whole is likely to be reduced. As such, it is concluded that development of this policy area could have a minor adverse impact on an

Heritage asset affected**What contribution does the site make to the significance of the heritage asset?****Potential impact of development on significance**

harbour, 19th century buildings, a promenade, and industrial housing.

reclaimed land on the flat coastal plateau that lies below the historic town centre. The town rises steeply to the north and west of this character area. Views are largely constrained out towards St Michaels Mount given the level of development surrounding the character area.

Issues for this part of the conservation area largely includes inconsiderate development. This includes road markings, public realm enhancements (like railings), and buildings detracting from the historic sense of the area.

The Barbican

This historic character area is entirely within the policy area. It is the earliest part of Penzance, though development of the area has made its Medieval origin unrecognisable. The Barbican is concentrated on two nearly parallel streets (Coinagehall Street and Quay Street); the church is a prominent feature on elevated ground. The area is bounded by two other historic character areas on either side, and views are mainly of the sea.

Issues for this historic character area include traffic levels (parking, traffic and pedestrian conflict over right of way, and vehicle speed), as well as streetscape and landscape, and unsightly buildings.

The Promenade

This historic character area covers the southern part of the policy area. It provides long views across to St Michael's Mount, The Lizard and the Goonhilly Earth Station satellite dishes on a clear day. Views to Newlyn, and structures on the skyline (like St Marys Church) are also important. It can be a busy area dominated by traffic and recreational uses like skating, and the ambience of the area is dependent on the weather conditions.

The surface of the promenade is in poor condition and can be different colours in some areas. Other issues in this part of the

asset of **medium significance**. This is due to potential negative effects on three historic character areas (mostly linked to traffic and pedestrian use). However, it is noted there is the potential for enhancements to the conservation area through improvements within its boundaries and its setting.

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
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conservation area include traffic (speed and volume), the poor condition of the streetscape and landscape, and buildings with poor character.

Given this policy area includes a large section of the Penzance Conservation Area, it is very likely development will impact upon the designation at this location and further afield it. However, it is possible some development may be screened by existing structures – limiting effects to the area included in the policy. Additionally, development could bring forward positive impacts – for example, structural and environmental improvements that enhance the landscape and streetscape of the Penzance Conservation Area. This would help improve the setting of this designation.

Grade II* South Pier: built before 1512, it includes a variety of different finishes representative of different time periods and types of work.

This listed structure is within the policy area in the north-eastern corner. Given the feature is at a lower elevation than the built environment to the west, development through this policy will likely affect its setting. Additionally, views to and from the feature (especially views from the structure to the town) are likely to be adversely affected by development through the policy. This is especially true for development adjacent to the Wet Dock and development in the Penzance Harbour area.

Development of this policy area would have a **medium adverse impact** on an asset of **medium significance**.

Grade II Store At Penzance Shipyard Immediately South Of Dry Dock: built in the mid-19th century, the store is rectangular in shape and constructed from granite. It is a component of an unusually complete group of harbour structures.

This listed structure is within the policy area in the north-west part. As this structure is slightly elevated in comparison to the rest of the policy area, there is the possibility development will affect the setting of this designation, especially in the Wet Dock area. However, given the proximity of other buildings to this designation (listed or otherwise), it is likely visual impacts will be screened out. As this feature is a component of a group of harbour structures, it is possible development around this feature could have impacts on other important harbour features, and vice versa.

Development of this policy area would have a **minor adverse impact** on an asset of **medium significance**.

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
Grade II Custom House: an early 19 th century construction, the building is built into a steeply sloping site – and is one storey in the south west, and 3 storeys in the north east. It is built from coursed granite rubble, and has a slate roof.	This listed structure is within the policy area, located in the northern half. Given the site is within an area of higher elevation in comparison to the majority of the policy area, it is possible that development in this part of Penzance could impact upon the setting of the site. This is especially true for the part of the structure that is three storeys in height – which is likely to offer longer and wider views across Penzance. Structures around this listed building are likely to provide an element of screening for the part that is one storey in height.	Development of this policy area would have a minor adverse impact on an asset of medium significance .
Grade II National Lighthouse Centre: the Trinity House depot, now the National Lighthouse Centre, was built in 1861. It is a large, rectangular, single storey six bay workshop. It is a largely complete example of a Trinity House depot and is one of a group of maritime buildings at Penzance harbour.	Located within the policy area, this listed building is situated back from the quay and is within proximity to other maritime listed buildings; adjoining the Grade II Trinity House Depot designation to the south. Given its proximity to other structures, it is likely existing development will screen any changes made through the policy from this structure. Additionally, the elevation of the site is similar to the surrounding policy area, and the screening from existing development will likely mitigate any visual impacts where the site is slightly higher or lower.	Development of this policy area would have a minor adverse impact on an asset of medium significance .
Grade II Trinity House Depot: an early 19 th century structure, with slate hipped roof. It is two storeys in height, with four window sashes, two splayed bay windows at the ends of the first floor, and glazing bars.	Located within the policy area, this listed building is situated back from the quay and is within proximity to other maritime listed buildings; adjoining the Grade II National Lighthouse Centre designation to the north. Given its proximity to other structures, it is likely existing development will screen any changes made through the policy from this structure. Additionally, the elevation of the site is similar to the surrounding policy area, and the screening from existing development will likely mitigate any visual impacts where the site is slightly higher or lower.	Development of this policy area would have a minor adverse impact on an asset of medium significance .
Grade II Battery and War Memorial: an 18 th century battery with attached bulwark overlooking Mounts Bay, attached to the mainland by a stone built causeway.	This designation is located in the southern part of the policy area, adjacent to the Grade II Jubilee Pool. Given the feature is positioned off the mainland it is possible it is a prominent structure that contributes to views of Mounts Bay from the shoreline. This is especially true for views from the east and south east, given the	Development of this policy area would have a minor adverse impact on assets of medium significance .

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
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The war memorial stands in the undeveloped nature of this part of the policy area. It is likely the centre of the battery and is designated features are screened from development to the far dedicated to the 207 men of north and west of the policy area by existing development, Penzance that died in the First especially to the north of Coinagehall Street. World War 1914-1919.

<p>Grade II Jubilee Pool: seaside lido built in 1935. It is triangular in shape and juts out into the sea, with steeped terraces descending from the entrances at the road level.</p>	<p>This Grade II listed structure is located within the southern part of the policy area. Given the elevation of the feature is generally at a lower elevation than the policy area, it is likely development of this area will visually impact the structure. It is also possible that it could alter the setting of the structure, which could impact upon the listed building's significance. However, if development was focused further north in the policy area, it is likely it would be screened from this designation given the presence of other development.</p>	<p>Development of this policy area would have a minor adverse impact on an asset of medium significance.</p>
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<p>Grade II Dry Dock At Penzance Shipyard: built in 1900, this rock-faced dressed granite dry dock is a good example of a commercial dry dock of the time. It is part of an unusually complete group of harbour structures.</p>	<p>This feature is located adjacent to the policy area to the north. Given the feature is at a similar elevation to the policy area, it is likely development around the harbour will impact on the setting of this designation. Development further away (for example, along Quay Street and Coinagehall Street) is unlikely to impact on the setting of this feature given the level of development and the distance between them.</p>	<p>Development of this policy area would have a minor adverse impact on an asset of medium significance.</p>
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<p>Grade II Churchyard Wall: a 19th century rubble wall surmounted by iron railings with arrow head shafts.</p>	<p>This listed structure is less than 10m west of the policy area boundary – it is in proximity to the north-western part of the policy area. Given the feature is at a higher elevation than the policy area, it is possible development will impact upon views from the structure. It is possible that existing development could provide a level of screening. However, it is currently considered unlikely that the setting of the structure will be impacted by development through the policy – this is due to the distance of the structure from the policy area. This is especially true if development is focused in the eastern, south-eastern and southern sections of the policy area.</p>	<p>Development of this policy area would have a minor adverse impact on an asset of medium significance.</p>
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Heritage asset affected**What contribution does the site make to the significance of the heritage asset?****Potential impact of development on significance**

Grade II* Parish Church Of St Mary: this church dates to 1832, though a chapel has been present on this site since 1321. It is designated for its design and construction, as well as its surviving features from 1832-5 – including the galleries and their seating.	This listed structure is less than 10m west of the policy area boundary – it is in proximity to the north-eastern part of the policy area. Given the feature is at a higher elevation than the policy area, it is possible development will impact upon views from the structure. It is possible that existing development could provide a level of screening. However, it is currently considered unlikely that the setting of the structure will be impacted by development through the policy – this is due to the distance of the structure from the policy area. This is especially true if development comes forward in the eastern, south-eastern and southern sections of the policy area.	Development of this policy area would have a minor adverse impact on an asset of medium significance .
Grade II Chapel House: 18 th century house set at a right angle to the road with a number of attractive features.	This listed building is approximately 20m north of the policy area. It is situated at a slightly higher elevation; as such, development in the policy area could impact upon views from the structure. However, it is likely existing development in this part of Penzance will provide a level of screening. This would help reduce any adverse impacts.	Development of this policy area would have a minor adverse impact on an asset of medium significance .
Grade II 30-32, Chapel Street: a late 18 th century granite ashlar structure with a slurried slate roof. It has two storeys, as well as a basement and attic. The designation also includes the plain iron railings in front of the house.	This listed building is approximately 35m to the north-west of the policy area. It is at higher elevation to the policy area, however it is likely to be screened from view due to existing development along Chapel Street. As such, views to and from this listed building in the direction of the policy area are unlikely to be impacted if development came forward for this site.	Development of this policy area is unlikely to have any significant impacts. As such, no adverse impacts are expected to occur for this asset of medium significance .
Grade II No. 29 Including Railings: a late 18 th century granite ashlar structure with a slurried slate hipped roof. It has three storeys, and the listing includes plain iron railings around the basement steps.	This listed building is approximately 40m to the north-west of the policy area. It is at higher elevation to the policy area, however it is likely to be screened from view due to existing development along Chapel Street. As such, views to and from this listed building in the direction of the policy area are unlikely to be impacted if development came forward for this site.	Development of this policy area is unlikely to have any significant impacts. As such, no adverse impacts are expected to occur for this asset of medium significance .

Heritage asset affected**What contribution does the site make to the significance of the heritage asset?****Potential impact of development on significance**

Grade II 20, Regent Terrace: an early 19th century structure with a granite basement and a slate roof. It has two storeys, as well as an attic and a basement. There is an open porch with Tuscan columns that support bay windows, and the flight of steps to the porch have iron railings.

This listed building is approximately 20m to the west of the policy area. It is at a slightly higher elevation to the policy area, and could have some views into and over the policy area from the rear of the building. However, these views would only be affected if development came forward in the western extent of the policy area, as existing development screens the majority of the policy area from view.

Development of this policy area would have a **minor adverse impact** on an asset of **medium** significance.

Policy PEN8: Harbour Car Park**Heritage asset affected****What contribution does the site make to the significance of the heritage asset?****Potential impact of development on significance**

Penzance Conservation Area: This policy area sits within the harbour and railway historic character area. covers the historic urban area, and has a complex archaeological and historical development. It includes medieval built form, the working harbour, 19th century buildings, a promenade, and industrial housing.

There has been a port in Penzance since the Middle Ages at the earliest, however during the 19th century the harbour as it is today started to take shape. The harbour area is built on largely reclaimed land on the flat coastal plateau that lies below the historic town centre. The town rises steeply to the north and west of this character area. Views are largely limited to views towards St Michaels Mount given the level of development surrounding the character area.

Development in this policy area is likely to encourage an increase in use of the harbour car park to support town centre opportunities and 'pop-up' structures. Given that there is a level of screening from the parts of the Penzance Conservation Area that are removed from this policy area (linked to existing development), the impact on this policy on the whole designation is likely to be reduced. As such, it is concluded that development of this policy area is likely to have **minor adverse impact** on an asset of **medium significance**, when considering the whole Penzance Conservation Area.

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
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Issues for this part of the conservation area largely includes inconsiderate development. This includes road markings, public realm enhancements (like railings), and buildings detracting from the historic sense of the area.

The policy area includes a large section of the conservation area. As such, it is very likely development will impact upon this character area and the wider conservation area, and increase pressure through a slight intensification in use of this area. However, some development may be screened by existing structures. Additionally, development could bring forward positive impacts – like structural and environmental improvements that would help improve the setting of this designation. The policy indicates development proposals will need to respect the historic character of this area and not adversely impact on its vitality. This provides a level of protection for this part of the conservation area.

Grade II Albert Pier: built in 1845 and extended in 1853, this is a long straight pier with a south end curving into the harbour.

This listed structure is adjacent to the policy area – running alongside the eastern boundary and continuing into the harbour. This designated feature is at the same elevation as the area included in this policy. As such, development through the policy would likely impact on views to and from this structure. Development through the policy is also likely to impact upon the setting of this listed structure, and could influence its role in the historic landscape of Penzance. It is likely the impact will be reduced given the policy indicates development proposals must respect the historic character of this area – which include historic features and their contribution to the townscape environment.

Development of this policy area would have a **minor adverse impact** on an asset of **medium significance**.

Grade II Warehouse Occupied By Courts (Furnishers): an 1872 warehouse constructed from coursed granite rubble. It has a

This listed structure is approximately 20m west of the policy area, on the opposite side of Wharf Road. It has direct views into the policy area and across it to the Grade II Albert Pier and the wider harbour area. These views are likely to be affected by development through this policy, with little opportunity for

Development of this policy area would have a **minor adverse impact** on an asset of **medium significance**.

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
central carriageway with a segmental arch.	screening. As well as views, it is likely the setting of this listed structure will also be impacted by development through this policy; given its open nature, it is unlikely development of this site can be mitigated for. However, it is likely the impact will be reduced given the policy indicates development proposals must respect the historic character of this area. This will include this feature and its setting.	
Grade II 42, Market Jew Street: a mid 19 th century corner structure with a slate roof with wide eaves. It has three storeys, and is listed due to its importance in a group of listed buildings along Adelaide Street.	This listed building is approximately 88m to the west of the policy area. It is at a slightly higher elevation to the policy area, and as such could have some longer distance views into and over the policy area. However, it is likely to be mostly screened from view due to the presence of existing development along Albert Street. As such, views to and from this listed building in the direction of the policy area are unlikely to be impacted if development came forward for this site.	Development of this policy area would have a minor adverse impact on an asset of medium significance .

Policy PEN9: Vitality of the Promenade

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
Penzance Conservation Area: covers the historic urban area, and has a complex archaeological and historical development. It includes medieval built form, the working	This policy area sits within The Promenade historic character area of the conservation area. This area provides long views across to St Michael's Mount, The Lizard and the Goonhilly Earth Station satellite dishes on a clear day. Views to Newlyn, and structures on the skyline (like St Marys Church) are also important. It can be a busy area dominated by traffic and recreational uses like skating,	Development of this policy area would have a minor positive impact on an asset of medium significance when considering the entire conservation area.

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
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harbour, 19 th century buildings, a promenade, and industrial housing.	and the ambience of the area is dependent on the weather conditions.	
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The surface of the promenade is in poor condition and can be different colours in some areas. Other issues in this part of the conservation area include traffic (speed and volume), the poor condition of the streetscape and landscape, and buildings with poor character. Given the policy area includes the entire promenade feature, it is very likely development will impact upon the conservation area. However, some development could bring forward positive impacts – for example environmental improvements would help improve the setting of this part of the conservation area. Additionally, the policy indicates development should not harm the historic character of the Promenade feature – this reduces the potential for adverse impacts.

Grade II Jubilee Pool: seaside lido built in 1935. It is triangular in shape and juts out into the sea, with steeped terraces descending from the entrances at the road level.	This Grade II listed structure is located approximately 25m east from the policy area. Given the elevation of the feature and the policy area is broadly the same and level, it is likely development of this area will visually impact the structure. It is also possible that it could alter the setting of the structure, which could impact upon the listed building's significance. However, this could be a positive impact – for example, environmental improvements would enhance the setting of the structure.	Development of this policy area would have a minor positive impact on an asset of medium significance .
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Grade II Stanley Guest House: early 19 th century granite rubble building with a slate roof. There are two storeys, and an open porch with Tuscan columns and entablature.	This listed building is approximately 30m north of the policy area. Given the structure is at a slightly higher elevation than the policy area, and has a window facing southwards, it is likely development will visually impact views to and from the building. However, as the policy focuses on environmental improvements and enhancements, it is likely development would bring forward positive impacts for the designation.	Development of this policy area would have a minor positive impact on an asset of medium significance .
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Policy PEN10: Mounts Bay Linear Park

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
<p>The policy area covers the South West Coast Path along the Penzance neighbourhood boundary. It is therefore likely that it will be within proximity to a number of historic environment features, including the Lescudjack Castle scheduled monument, as well as a number of listed buildings. It will also pass through the Penzance Conservation Area and its associated historic character areas.</p>	<p>The policy focuses on safeguarding and enhancing the South West Coast Path into and through the Penzance settlement, and creating an accessible linear park along the shoreline. This is seen as a positive impact for the historic environment assets that are in proximity to the policy area, as environmental improvements will contribute to the enhancement of their settings. Additionally, the policy will encourage a greater level of use of the South West Coast Path and improve access to the historic environment features. This will lead to greater engagement with the historic environment in the area, which is another positive impact. However, it could also result in a slight increase in pressure on these features. This would be a minor adverse impact, given the South West Coast Path is likely to already cause a level of pressure.</p>	<p>Development of this policy area would have a medium positive impact on historic environment assets within proximity.</p>

Policy NEW3: Access to the South Pier and Observatory

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
<p>Newlyn Conservation Area: the scale and massing of the buildings in Newlyn are noticeably intimate in nature, representing a major component of the town's character. It is still a working fishing port, which</p>	<p>The site is located towards the centre of the Newlyn Conservation Area, close to the western boundary of the designation. However, despite this it is visually screened from the majority of the conservation area due to the existing built environment. The site is relatively level and is at a similar elevation to surrounding buildings. However, development through this policy</p>	<p>Development of this policy area would have a minor positive impact on an asset of medium significance when you consider the entire conservation area.</p>

Heritage asset affected**What contribution does the site make to the significance of the heritage asset?****Potential impact of development on significance**

is also of particular importance. The Newlyn Conservation includes the town and harbour, extending out to safeguard the old artists' studios in The Meadow area, and the Newlyn Art Gallery.

is not likely to visually impact structures in proximity. This is due to the wall and vegetation on the southern site boundary. Additionally, the policy indicates proposals should include designs that allow for enhancements to the character of the structure's setting. This will likely bring forward positive impacts for this part of the Newlyn Conservation Area through improvements to the wider environment.

Grade II Newlyn tidal observatory and part of the south pier: a tidal observatory that established Mean Sea Level by the Ordnance Survey between 1915 and 2021. It has contributed more than 100 years of tidal data for use in oceanography, geology and climate change.

This listed structure is within the policy area, and is the focus of the policy itself. The policy looks to support development that improves access to the listed building, and enhances the heritage value of the feature, the associated South Pier, and their settings. This will likely bring forward positive impacts for the grade II listed structure, as a greater level of access will allow for increased engagement with the historic environment. Additionally, enhancements will contribute to the improvement of the feature's setting, which will likely influence how the feature is viewed in the wider historic landscape. Improving access has the potential to increase the number of people engaging with this structure, which could increase pressure on it; however, this is unlikely to be a significant adverse effect.

Development of this policy area would have a **high positive impact** on an asset of **medium significance**.

Grade II Quay Cottage: an 18th century colourwashed plastered rubble structure with a slurried slate roof. This listed building forms part of a group of buildings that are recognised for their combined importance, though the others in the group are not nationally designated.

This grade II listed building is approximately 26m west of the policy area. Given the building has a higher elevation than the policy area, it is likely development would impact upon views to and from the feature, as well as its setting. However, given the policy is seeking to enhance the historic setting of the policy area, bringing forward development is likely to encourage positive impacts for this listed structure. This is due to improvements to its setting, and enhancements to views to and from the designation.

Development of this policy area would have a **medium positive impact** on an asset of **medium significance**.

Grade II 54 and 54A, Fore Street: built around the 17th and 18th centuries, these two structures are two storeys in height with a number

This designation is located approximately 98m north-east of the policy area. As the structure is at a higher elevation than the policy area, it is likely development would impact upon long views across the harbour from this feature. This has the potential to impact upon

Development of this policy area would have a **minor positive impact** on an asset of **medium significance**.

Heritage asset affected**What contribution does the site make to the significance of the heritage asset?****Potential impact of development on significance**

of interesting features, including the upper floor oversailing slightly.

its setting. However, given the policy is seeking to enhance the historic setting of the policy area, bringing forward development is likely to encourage positive impacts for this listed structure. This is due to enhancements to views from the designation. Given the distance of this designation from the policy area, positive impacts are likely to be reduced in significance.

Grade II 64 and 68, Fore Street: early 18th century rubble structures with slate roofing. They are one storey in height, with an attic. They form part of a wider group of buildings of local historic interest.

This designation is located approximately 77m north-east of the policy area. As the structure is at a higher elevation than the policy area, it is likely development would impact upon long views across the harbour from this feature. This has the potential to impact upon its setting. However, given the policy is seeking to enhance the historic setting of the policy area, bringing forward development is likely to encourage positive impacts for this listed structure. This is due to enhancements to views from the designation. Given the distance of this designation from the policy area, positive impacts are likely to be reduced in significance.

Development of this policy area would have a **minor positive impact** on an asset of **medium significance**.

Policy NEW6: The Old Bottle Top Factory**Heritage asset affected****What contribution does the site make to the significance of the heritage asset?****Potential impact of development on significance**

Newlyn Conservation Area: the scale and massing of the buildings in Newlyn are noticeably intimate in nature, representing a major component of the town's character. It is still a working fishing port, which

The policy area is located approximately 40m south-west of the Newlyn Conservation Area. Despite this proximity, it is unlikely to contribute to the setting of the conservation area. This is due to its current condition. The policy seeks to enable remediation and reuse of the brownfield site. This has the potential to bring forward benefits for the Newlyn Conservation Area through improving and

Development of this policy area would have a **minor positive impact** on an asset of **medium significance** when considering the entire conservation area.

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
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<p>is also of particular importance. The Newlyn Conservation includes the town and harbour, extending out to safeguard the old artists' studios in The Meadow area, and the Newlyn Art Gallery.</p>	<p>enhancing its setting. This could improve views into the conservation area from the west.</p>	
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Policy NEW8: Penlee Quarry

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
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<p>No heritage assets are located within or in proximity to the policy area. However, the policy area comprises a quarry which is nationally designated as a Site of Special Scientific Interest (SSSI) for its geological significance.</p>	<p>The policy area includes Penlee Quarry, which was in operation from the 1880s to the 1990s – the materials from which were exported to various north European countries. It is a highly sensitive area for its geology, and is also likely to hold local historic importance linked to past exportation and use. To reflect this, the policy indicates that if development were to come forward at this site, the materials and design used would need to celebrate the quarry's heritage. This could bring forward positive impacts for the policy area by enhancing the local understanding of and appreciation for this site. However, development would increase pressure on this site – which is likely to impact upon the current historic interpretation of the site. This is likely to outweigh any potential benefits development could have.</p>	<p>Development of this policy area would have a medium to high adverse impact on site which is designated for its significant geological interest.</p> <p>It is important to recognise that as the site is designated as a SSSI, further consultation with Natural England is likely to be required with respect to any proposals for mixed-use development which may come forward at this location.</p>
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Policy NEW9: The Heritage Harbour (Old Quay)

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
<p>Newlyn Conservation Area: the scale and massing of the buildings in Newlyn are noticeably intimate in nature, representing a major component of the town's character. It is still a working fishing port, which is also of particular importance. The Newlyn Conservation includes the town and harbour, extending out to safeguard the old artists' studios in The Meadow area, and the Newlyn Art Gallery.</p>	<p>The policy area is located within the southern half of the Newlyn Conservation Area, and in proximity to several other designated historic environment features. It is likely the policy area can be viewed from multiple locations within the conservation area, especially to the north along North Pier and Mary Williams Pier. Given this, the area included under this policy has the potential to contribute to the historical setting of the Newlyn settlement and the wider conservation area. As such, development would have direct impacts on the historic environment. Given the policy is focused on bringing forward enhancements to a specific historic feature in order to improve its historical status, it is likely development through this policy will lead to positive effects for the Newlyn Conservation Area. This is through improvements to a historic feature that contributes to the designation.</p>	<p>Development of this policy area would have a minor positive impact on an asset of medium significance when considering the entire conservation area.</p>
<p>Grade II* The Old Harbour Pier And Walls: Dating from before 1435, this feature has been altered across the years. It is a granite rubble construction on a slightly curved plan, with a seawall on part of the seaward side.</p>	<p>This listed structure is not only within the policy area, but comprises the majority of it. As such development through this policy will directly impact upon this feature. However, this policy is focused upon improving the structure – it seeks development that will protect and retain the heritage value and significance of the feature and its setting. As such, development through this policy would bring forward benefits for this listed structure.</p>	<p>Development of this policy area would have a high positive impact on an asset of medium significance.</p>
<p>Grade II 39 Fore Street (Newlyn Old Quay Restaurant And House): A late 18th century house that was in use as a restaurant and shop in the 20th century, and then converted back to a residential property in the 21st century. It is built from granite rubble, and is</p>	<p>This listed structure is adjacent to the policy area – located to the west. Given this structure is higher in elevation than the policy area, development here would impact upon the setting of this designation and views from it. However, as the policy is seeking to bring forward development that improves the historic significance of the policy area, it is likely it will bring forward benefits to this listed structure. This is through enhancing its setting and the views from the building across the old quay and heritage harbour area.</p>	<p>Development of this policy area would have a medium positive impact on an asset of medium significance.</p>

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
designated for its historic and architectural interest.	<p>Grade II 54 And 54A, Fore Street: This listed structure is located to the south of the policy area – approximately 7m away on the opposite side of Cliff Street. Given this historic designation is higher in elevation than the policy area, development is likely to impact upon its setting, and the views it offers across the old quay and the harbour area. However, given the policy is seeking to bring forward development that improves the historic significance of the policy area, it is likely it will bring forward secondary benefits to this listed structure. This is through enhancing its setting and views through protecting and improving the old quay, which helps enhance the heritage harbour area.</p>	Development of this policy area would have a minor positive impact on an asset of medium significance .
<p>Grade II 64 And 68 Fore Street: early 18th century rubble structures with slate roofing. They are one storey in height, with an attic. They form part of a wider group of buildings of local historic interest.</p>	<p>This listed structure is located to the south of the policy area – approximately 11m away on the opposite side of Cliff Street. Given this historic designation is higher in elevation than the policy area, development is likely to impact upon its setting, and the views it offers across the old quay and the harbour area. However, given the policy is seeking to bring forward development that improves the historic significance of the policy area, it is likely it will bring forward secondary benefits to this listed structure. This is through enhancing its setting and views through protecting and improving the old quay, which helps enhance the heritage harbour area.</p>	Development of this policy area would have a minor positive impact on an asset of medium significance .
<p>Grade II The Red Lion Inn: an 18th century granite ashlar L-shaped building, with flat arches and projecting keystones. It is two storeys in height.</p>	<p>This listed structure is located approximately 50m west of the policy area along Cliff Road. Given this historic designation is higher in elevation than the policy area, development is likely to impact upon its setting, and the views it offers across the old quay and the harbour area. However, given the policy is seeking to bring forward development that improves the historic significance of the policy area, it is likely it will bring forward secondary benefits to this listed structure. This is through enhancing its setting and views through protecting and improving the old quay, which helps enhance the heritage harbour area.</p>	Development of this policy area would have a minor positive impact on an asset of medium significance .

Heritage asset affected**What contribution does the site make to the significance of the heritage asset?****Potential impact of development on significance**

Grade II Quay Cottage: an 18th century colourwashed plastered rubble structure with a slurred slate roof. This listed building forms part of a group of buildings that are recognised for their combined importance, though the others in the group are not nationally designated.

This listed structure is located approximately 60m south-east of the policy area along Cliff Road. Given this historic designation is higher in elevation than the policy area, development is likely to impact upon its setting, and the views it offers across the old quay and the harbour area. However, given the policy is seeking to bring forward development that improves the historic significance of the policy area, it is likely it will bring forward secondary benefits to this listed structure. This is through enhancing its setting and views through protecting and improving the old quay, which helps enhance the heritage harbour area.

Development of this policy area would have a **minor positive impact** on an asset of **medium significance**.

Policy NEW10: The Village Square**Heritage asset affected****What contribution does the site make to the significance of the heritage asset?****Potential impact of development on significance**

Newlyn Conservation Area: the scale and massing of the buildings in Newlyn are noticeably intimate in nature, representing a major component of the town's character. It is still a working fishing port, which is also of particular importance. The Newlyn Conservation includes the town and harbour, extending out to safeguard the old artists' studios in

The site is located within the Newlyn Conservation Area, in the north-eastern area. Whilst it is removed from most of the designated sites within the conservation area (which are located more centrally and to the south), the policy area includes two listed buildings and is within proximity to another. As such, development here is unlikely to be screened from these features, and could impact upon their individual settings and the setting of the wider conservation area. However, the policy is looking to bring forward access improvements and environmental enhancements / redesign. This has the potential to improve the historical setting of the area and improve historical interpretation / understanding. This could contribute to enhancing the wider Newlyn Conservation Area.

Development of this policy area would have a **minor positive impact** on an asset of **medium significance** when considering the impact upon the entire conservation area.

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
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The Meadow area, and Newlyn Art Gallery.

<p>Grade II Newlyn War Memorial: a WW1 memorial altered to include the names of the fallen of WW2 and the Korean war. It is designated for its historic interest and contribution to the community, as well as for its design.</p>	<p>This listed structure is within the policy area – as such, it will be directly impacted by development at this location. This is due to changes in the setting of the memorial, which would impact upon how it is viewed in the wider townscape context. However, these impacts are likely to be positive given the policy looks to encourage environmental enhancements and redesign. This will contribute to an improved setting for this listed structure.</p>	<p>Development of this policy area would have a minor-moderate positive impact on an asset of medium significance.</p>
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<p>Grade II Former Admiralty Boat House: a former Coastguard boat house with watch room of 1901 constructed by the Admiralty to serve Newlyn Harbour. It is designated for a number of reasons, including its composition and design, the granite used in construction, and its contribution to the historic quarter of Newlyn.</p>	<p>This historic feature is within the policy area and will be directly impacted by development at this location. This is due to changes in the setting of this structure, which has the potential to impact upon how it is viewed from structures to the west and south. However, the policy seeks to bring forward development that encourages environmental enhancements and redesign, as well as improves public access. Therefore, development would bring forward positive effects linked to improving the setting of this designation and access to it – which promotes a greater level of engagement between the historic environment and the community.</p>	<p>Development of this policy area would have a minor-moderate positive impact on an asset of medium significance.</p>
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<p>Grade II Old Bridge: estimated to be an early 19th century structure, the bridge is built from granite. It has a single segmental arch with a keyblock and a parapet.</p>	<p>This structure is approximately 26m north of the policy area. It is visually screened from the policy area by existing development. As such, it is unlikely development through the policy will impact upon its setting and significance.</p>	<p>Development of this policy area is unlikely to have any significant impacts for this asset of medium significance.</p>
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<p>Grade II Former Ice Works: an ice works dating from 1907, constructed using an earlier granite building. This structure is designated for its design and</p>	<p>This listed building is approximately 88m south of the policy area, and is likely to offer views across it. As such, development of the policy area is likely to benefit this feature. This is due to the policy seeking to encourage environmental enhancements and redesign,</p>	<p>Development of this policy area would have a high positive impact on an asset of medium significance</p>
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Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
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<p>character, its status as a landmark feature for the community, the survival of machinery, and its historic interest. It also contributes to the historic quarter of Newlyn.</p>	<p>which will improve the visual amenity of the townscape in which the listed building sits.</p>	
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Policy NEW11: The Old Iceworks

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
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<p>Newlyn Conservation Area: the scale and massing of the buildings in Newlyn are noticeably intimate in nature, representing a major component of the town's character. It is still a working fishing port, which is also of particular importance. The Newlyn Conservation includes the town and harbour, extending out to safeguard the old artists' studios in The Meadow area, and the Newlyn Art Gallery.</p>	<p>The site is located towards the centre of the Newlyn Conservation Area. However, it is visually screened from most of the conservation area due to elevation differences, the existing built environment, and levels of vegetation. The policy seeks to bring a building back into appropriate use, taking into consideration the historical importance of the structure in question. This is likely to extend to its importance for the wider historical environment and the Newlyn Conservation Area. As such, it is likely to bring forward benefits for the conservation area by regenerating a structure that contributes to the designation and the historical importance of the area.</p>	<p>Development of this policy area would have a minor positive impact on an asset of medium significance when you consider the entire conservation area.</p>
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<p>Grade II Former Ice Works: an ice works dating from 1907, constructed using an earlier granite building. This structure is designated for its design and character, its status as a landmark feature for the community, the</p>	<p>The policy concerns this listed structure – it seeks the regeneration of the building and focuses on bringing it back into appropriate use. This will likely lead to positive effects for this feature, as development will need to reflect the historic use of the building and protect / enhance its heritage value, character and setting. This</p>	<p>Development of this policy area would have a high positive impact on an asset of medium significance</p>
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Heritage asset affected**What contribution does the site make to the significance of the heritage asset?****Potential impact of development on significance**

survival of machinery, and its protection and enhancement will ensure the historic importance of historic interest. It also contributes to the historic quarter of Newlyn.

Grade II 15 and 17, The Fragdan: early 19th century houses with a granite ashlar front, slate hipped roof with wide eaves that comprise of two storeys and a basement.

This designation is approximately 5m west of the policy area. Given the elevation of the feature and the policy area is broadly the same and level, it is likely development will visually impact upon views from the rear of the properties. This could impact upon the setting of these two structures. However, as the policy is focused on protecting and enhancing a historic structure and its setting, it is considered likely that any impacts to the Fragdan structures will be positive.

Development of this policy area would have a **minor positive impact** on an asset of **medium significance**.

Grade II Former Admiralty Boat House: a former Coastguard boat house with watch room of 1901 constructed by the Admiralty to serve Newlyn Harbour. It is designated for a number of reasons, including its composition and design, the granite used in construction, and its contribution to the historic quarter of Newlyn.

This historic feature is approximately 88m north of the policy area. As such, it is possible that it will be impacted by development at this location, as southward views from the structure could change. However, it is likely development of the policy area would positively impact upon this designated building. This is due to the policy encouraging development that focuses on regenerating, protecting and enhancing a structure that forms part of the setting of this grade II listed building.

Development of this policy area would have a **minor positive impact** on an asset of **medium significance**.

Policy NEW13: The Seafood Training Hub Facility

Heritage asset affected	What contribution does the site make to the significance of the heritage asset?	Potential impact of development on significance
<p>Newlyn Conservation Area: the scale and massing of the buildings in Newlyn are noticeably intimate in nature, representing a major component of the town's character. It is still a working fishing port, which is also of particular importance. The Newlyn Conservation includes the town and harbour, extending out to safeguard the old artists' studios in The Meadow area, and the Newlyn Art Gallery.</p>	<p>The site is located towards the centre of the Newlyn Conservation Area, close to the western boundary of the designation. However, despite this it is visually screened from the majority of the conservation area due to the existing built environment. The site is relatively level and is at a similar elevation to surrounding buildings. However, development through this policy is not likely to visually impact structures in proximity. This is due to the wall and vegetation on the southern site boundary. Additionally, the policy indicates proposals should include designs that allow for enhancements to the character of the structure's setting. This will likely bring forward positive impacts for this part of the Newlyn Conservation Area through improvements to the wider environment.</p>	<p>Development of this policy area would have a minor positive impact on an asset of medium significance when you consider the entire conservation area.</p>
<p>Grade II 1, Trewarveneth Street: an 18th century whitened rubble building with a slurried slate half-hip roof. It is two storeys in height.</p>	<p>This designation is approximately 65m south-east of the policy area. Given the elevation is level, it is possible the listed building has views into the policy area from the street. As such, the setting of this designation could be impacted if development were to come forward at this location. The policy indicates proposals should include designs that allow for enhancements to the character of the structure's setting. This will likely bring forward positive impacts to this listed structure through improvements to the wider environment. However, the impacts would be limited given the reduced view into the policy area from this designation.</p>	<p>Development of this policy area would have a minor positive impact on an asset of medium significance.</p>
<p>Grade II Art Gallery: an early 18th century building with a half-hipped steep slate roof. It is two storeys in height and has a large side chimney stack and external stone steps to the first floor doorway.</p>	<p>This designation is approximately 70m south-east of the policy area. Given the elevation is level, it is possible the listed building has views into the policy area from the street. As such, the setting of this designation could be impacted if development were to come forward at this location. The policy indicates proposals should include designs that allow for enhancements to the character of the structure's setting. This will likely bring forward positive impacts to</p>	<p>Development of this policy area would have a minor positive impact on an asset of medium significance.</p>

Heritage asset affected

What contribution does the site make to the significance of the heritage asset?

Potential impact of development on significance

this listed structure through improvements to the wider environment. However, the impacts would be limited given the reduced view into the policy area from this designation.

Grade II Memorial to Louisa AM McGrigor: a memorial from 1921 dedicated to Louisa AM McGrigor who died serving the Cornwall Voluntary Aid Detachment during WW1.

This designation is approximately 80m south-east of the policy area. Given the elevation is level, and the memorial is located in an open space, development within the policy area would have the potential to impact the setting of the designation. The policy indicates proposals should include designs that allow for enhancements to the character of the structure’s setting. This will likely bring forward positive impacts to this memorial through improvements to the wider environment.

Development of this policy area would have a **minor positive impact** on an asset of **medium significance**.

