

**Carlyon Bay
Environmental
Statement (2011)**

Chapter B

Scope & Methodology

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Nathaniel Lichfield &
Partners, 14 Regents
Wharf, All Saints
Street, London N1 9RL

Tel: 020 7837 4477

www.nlplanning.com

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B1.0 Introduction

B1.1 This chapter describes the process undertaken to identify the environmental issues as those likely to give rise to significant effects requiring environmental impact assessment ('EIA'). It also explains how the EIA has assisted in the development of the proposals which are the subject of the hybrid planning application.

B1.2 Individual chapters (chapters D to M) of the ES describe the methodologies undertaken to consider the potential significant environmental effects arising.

B1.3 The structure of this chapter comprises:-

- 1 A summary of the process of scoping the EIA with Cornwall Council including initial discussions and the submission of a formal request for an EIA Scoping Opinion in July 2010 and an updated request in September 2010.
- 2 A review of some of the overall difficulties in the process of assessment that have arisen in carrying out the EIA. Further detail is provided in chapters D to M where relevant and applicable.
- 3 An overview of the consultation which has taken place during preparation of the EIA; a consideration of how the views expressed have been accommodated in the process of EIA; and how the EIA has informed the development of the scheme design through an iterative process of review and consultation.

B1.4 Chapter C of this ES provides further information on the scheme design.

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B2.0 **Scope of the ES**

Request for an EIA Scoping Opinion

- B2.1 To assist in identifying those environmental issues requiring consideration, the Town & Country Planning (EIA)(England & Wales) Regulations 1999 (as amended) ('the 1999 Regulations') make provision for an applicant to seek the local authority's formal opinion on the scope of an EIA (the 'scoping opinion'). The scoping opinion identifies those issues that the local authority considers may give rise to the most significant effects and enables the applicant to focus the assessment on those areas.
- B2.2 The scope of the EIA had been the subject of informal discussion with Cornwall Council during 2010 and followed on from ongoing discussions on proposals for the site during several years previously. This included the useful context set by the several years of ongoing discussions and scheme development in relation to the extant scheme described in Chapter A of this ES. In addition, comments had been received and discussed with statutory consultees and key stakeholders and were taken into account in both scoping the EIA and in carrying out the assessment.
- B2.3 On 2 July 2010, CEG formally requested that Cornwall Council form an EIA scoping opinion with respect to the proposals at Carlyon Bay. A copy of that request is provided at Appendix B1.
- B2.4 The request was made under Regulation 10 of the 1999 Regulations which establishes the criteria which need to be provided to assist a relevant planning authority in forming a scoping opinion. Accordingly a summary of the likely issues, the potential effects and the proposed methodology of assessment for the identified areas of interest accompanied the request. It is considered that sufficient information was provided to enable Cornwall Council in forming an EIA scoping opinion.
- B2.5 Cornwall Council provided their formal scoping opinion on 19 August 2010. A copy of the opinion is provided at Appendix B2 along with copies of correspondence received during consideration of the request for a formal opinion.
- B2.6 On 24 September 2010, CEG formally requested that Cornwall Council form an opinion on whether changes to the proposed residential mix which had been described in the earlier scoping request (Appendix B1) could give rise to other issues which may require them to update their scoping opinion of 19 August 2010. A copy of the request is provided at Appendix B3 and the response of 18 October 2010 is provided at Appendix B4.
- B2.7 Cornwall Council confirmed that the list of consultees who assisted in them forming their scoping opinion (and who provided responses) are as follows: -

- 1 Cornwall Council (Highways Officer, Pollution Control, Conservation Officer, Historic Environment Advisor, Natural Environment Team, Landscape and Urban Design)
- 2 Cornwall Wildlife Trust
- 3 Carlyon Parish Council
- 4 St Blaise Parish Council
- 5 Natural England
- 6 Environment Agency
- 7 Highways Agency
- 8 Cornwall RIGS Group
- 9 Carlyon Bay Watch Ltd

The Scope of the EIA

- B2.8 Cornwall Council's Scoping Opinion of 19 August 2010 confirms their agreement that the EIA should address the following: -
- 1 Water Resources
 - 2 Biodiversity
 - 3 Socio-Economics
 - 4 Transportation
 - 5 Air Quality
 - 6 Noise and Vibration
 - 7 Visual Effects and Landscape
 - 8 Geology/Ground Conditions
 - 9 Waste
 - 10 Heritage
- B2.9 Cornwall Council's updated Scoping Opinion of 18 October 2010 advised of no additional environmental areas to be addressed.
- B2.10 Cornwall Council requested detailed consideration of alternative sites, as well as compensation and mitigation measures. The Council also requested consideration in the ES of the cumulative effects which may arise from the scheme in conjunction with the following developments:-
- 1 Wainhomes development, Treverbyn Road, St Austell
 - 2 Golphin Farm
 - 3 Midas site, Par Lane
 - 4 Metso
 - 5 Duporth Holiday Village
 - 6 Eden Geothermal Powerplant

7 Eco- Town likely submissions (West Carcalze/Baal, pilot phase of Baal, Par, Blackpool, Goonbarrow, Nanpean and Drinnick)

B2.11 Cornwall Council requested that the proposed residential split will need to be fully considered in all relevant sections of the ES.

B2.12 The table below identifies where or how issues raised by Cornwall Council or consultees in the Scoping Opinion have been addressed in this ES:-

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Respondent	Summary of Issue Raised	Location in ES/Response from CEG team
Cornwall Council (19/08/10)	The requirements of the European Directive (92/43/EEC), 'the Habitats Directive' and the Conservation (Natural Habitats & c) Regulations 1994, (the "Habitats Regulations") as amended must be appropriately considered.	See Chapter E for consideration of relevant designated species. The nearest designated site is not within sufficient proximity to require consideration.
	A Construction Environment Management Plan (CEMP) will need to be produced to identify how emissions to air, soil and water will be managed and to identify measures to protect biodiversity during construction, but that this will not be required until a planning permission is granted. The Council recommend that the EIA is scoped so that the temporary impacts of the construction phase are easily distinguished from the impacts of the operational phase/after restoration.	See all Chapters for consideration of construction effects which is addressed separately to those arising after completion of the scheme. Chapter C (and appendices) provide information on the construction methodology which has been considered. Construction management is capable of being addressed via planning conditions attached to any planning permission for the site and through the Construction Environment Management Plan (CEMP).
Cornwall Council – Highways Offices (19/08/10)	Have met transport consultants to agree scope of TA and Travel Plan.	See Chapter G and appendices
Cornwall Council – Pollution Control	In relation to land contamination the ES should include an up to date phased investigation of the site. As a minimum this should include a desk study with a conceptual model outlining any potential risks to relative receptors.	See Chapter K – An up to date phased investigation of the site has been undertaken and is appended to the ES.
Cornwall Council – Conservation Officer	Recommend that Tregrehan House is included within the assessment	See Chapter M
Cornwall Council – Historic Environment Advisor (Archaeology) (13/07/10)	Require that a revised assessment of the existing archaeology assessment for the site is incorporated into the Cultural Heritage Chapter. The assessment should assess and describe the significance of the setting of Charlestown in terms of both the 'character and appearance' of the 'special architectural and historic interest' of the Conservation Area and the 'Outstanding Universal Value' of the World Heritage Site. Once the EIA has determined the significance of these matters, it should assess the likely impacts of the proposals on them. Provided this is included consider the cultural heritage scope is appropriate.	See Chapter M and appendices

Respondent	Summary of Issue Raised	Location in ES/Response from CEG team
<p>Cornwall Council – Natural Environment Team (04/08/10)</p>	<p>Further bat surveys, including emergence activity for the buildings to be demolished are advised. The surveys should follow the Bat Conservation Trust Guidelines (2007) for habitat value assessment – recommend the use of remote monitoring and manual equipment. It is essential to determine which species, if any, are present and how populations will be affected through the proposed development (e.g. through lighting, destruction of foraging habitat and interrupted flight lines).</p>	<p>See Chapter E and appendices</p>
	<p>Further surveys using boxes to be undertaken to determine presence of dormice at the site. Confirmation of surveys and results should be detailed in the ES</p>	<p>See Chapter E – Surveys have identified no dormice are present</p>
	<p>Recommend following of any additional advice or recommendations offered by the RSPB in respect of breeding birds.</p>	<p>See Chapter E – no advice received from RSPB to date.</p>
	<p>Details of the monitoring of reptiles based on the 1998 (J.N.C.C) herpetofauna manual (key months and details of mats) must be included within the methodology. If the methodology has not been followed, the rationale behind this decision should be included within the ES.</p>	<p>See Chapter E – Full methodology is included in the Appendix to Chapter E.</p>
	<p>Would like confirmation that the Phase 1 and 2 vegetation surveys include the dune area at Polgaver</p>	<p>See Chapter E – These surveys have been carried out and are reported in Chapter E.</p>
	<p>The habitats and species of principle importance detailed in Section 41 of the Natural Environment and Rural Communities Act 2006 should be considered and, where there are significant populations or areas of habitat, these should be accounted for.</p>	<p>See Chapter E – These habitats and species have been listed.</p>
	<p>Consideration should be given to the ‘Open Mosaic Habitats on Previously Development Land’ BAP habitat category.</p>	<p>See Chapter E – This habitat is considered in Chapter E.</p>
	<p>Restricting development to Crinnis would be the preferred option in terms of significantly reducing adverse environmental impacts.</p>	<p>See Chapter E – no evidence has been provided to justify this statement.</p>

Respondent	Summary of Issue Raised	Location in ES/Response from CEG team
<p>Cornwall Council – Natural Environment Team (04/08/10) CONT</p>	<p>Cannot comment on how the intertidal/subtidal environment may be impacted by the development. However, sea defences are likely to have an impact on biological and physical processes in the inter/subtidal zones. It is expected that intertidal/subtidal (species and habitat) surveys carried out in 2007 and included in the ES. Recommend a desk-top exercise to capture any ERCCIS records collected since 2007 also included within the ES.</p>	<p>See Chapter E – The Environment Agency and Natural England have agreed that subtidal surveys are not required to inform the ES. Intertidal surveys have been completed and will be incorporated. ERCCIS has been consulted and provided data.</p>
	<p>Further details regarding the construction, orientation, location and materials should be made available for comment.</p>	<p>See Chapter C</p>
	<p>Survey work may require updating, clear guidance on validity of surveys in relation to time span of the project is requested.</p>	<p>See Chapter E – Earlier surveys have been updated and new surveys carried out between March 2009 and August 2010.</p>
	<p>The consideration of alternatives sites and site layout, must be detailed. Consideration of alternatives sites, mitigation and compensation measures must be included within the ES. Cumulative impacts from other developments occurring within the area (eg, St Austell eco-town, Wainhomes) must be considered.</p>	<p>See Chapters C and N</p>
	<p>Only if there are good technical reasons for not using SuDS will connection to sewers be considered.</p>	<p>See Chapter C. A SuDs scheme is included within the proposals</p>
	<p>The ‘need for development’ must be put in context with (and should not compromise) the features that attract tourists in the first place. Would like further details on plans to include permanent residential dwellings.</p>	<p>See Chapter A and C</p>
	<p>Would like to see further information relating to capacity of the existing sewerage treatment works to which the sewer is to be connected, the level of treatment, and disposal options for effluent and sludge produced on site.</p>	<p>See Chapter D - South West water has confirmed there is capacity at the sewage treatment works.</p>
<p>Cornwall Council – Landscape and Urban Design (20/08/10)</p>	<p>The marine implications must be considered either as separate headings or under all other matter headings.</p>	<p>See Chapters D and E – potential impact upon the marine environment has been considered.</p>
	<p>The ES should take into account the LCA guidelines.</p>	<p>See Chapters J and M</p>

Respondent	Summary of Issue Raised	Location in ES/Response from CEG team
Cornwall Council – Landscape and Urban Design (20/08/10) - CONT	The proposal should highlight how the statutory NERC duties will be fulfilled.	See Chapter E – which deals with the NERC duties
	Detailed surveys are required to assess wildlife	See Chapter E – Earlier surveys have been updated and new surveys carried out between March 2009 and August 2010.
	Ensure green link corridors are provided towards saline lagoon local nature reserves and fens at Par.	See Chapter C. Note comments but this is outside of the area of the assessment.
	The ES needs to clearly indicate why the construction of residential properties is necessary here rather than within the town boundary or proposed eco town.	Planning matter – dealt with in Planning Statement – not for consideration in the ES.
Cornwall Wildlife Trust	Would like information on the enhancements planned for biodiversity, over and above any mitigation and compensation schemes.	See Chapter E – Baker Associates have worked with the design team to incorporate features that will enhance biodiversity and which includes a Landscape and Ecology Management Plan.
	Keen for the site not to be overdeveloped and would favour proposals which were restricted to Crinnis beach over proposals to bring in Shorthorn and Polgaver.	See Chapters A and C and planning application submission (including Planning Statement). No development on Polgaver; Bulk (70%) of built development accommodated on Crinnis
Carlyon Parish Council (28/07/10)	Request a much more detailed account of the areas and methodology to be used with reference to the impact of both the construction phase and final usage phase.	See all Chapters
	No mention of affordable housing within the permanent development	See Chapters C and F. Affordable housing provision to be provided off-site
	Request that a more detailed assessment of the overburdened sewage system and suitable solutions to dealing with any further increase in sewerage is provided, rather than just considering the removal of waste produced by the proposed development.	South West water has confirmed there is capacity at the sewage treatment works and a new sewer will be provided from the site to a suitable connection point on the existing network.
	Concerns regarding transport to and from any development on Crinnis beach, both during the building phase and on completion. There should be a reassessment of the road network in the immediate and wider area covering high and low season usage, effect of proposed traffic increases in the surrounding villages and	See Chapter G and Transport Assessment

Respondent	Summary of Issue Raised	Location in ES/Response from CEG team
	<p>estates, immediate roads as to their suitability for heavy construction traffic and plans to maintain roads to a required standard. Volume of traffic on the roads is a concern.</p>	
	<p>Would like to see the ES include an assessment on local residents' quality of life.</p>	<p>[Not relevant to the ES].</p>
<p>St Blaise Parish Council</p>	<p>Would like to see access to Polgaver Beach from the coastal footpath at Fishing Point.</p>	<p>Pedestrian access proposed as part of scheme. See Chapter C</p>
<p>Natural England (12/08/10)</p>	<p>Confirm the site of the proposed works is not located within the boundary of an area designated as a European site of conservation importance under the provision of the Conservation (Natural Habitats &c) Regulations, 1994 nor listed as a Site of Special Scientific Interest.</p>	<p>See Chapter E – The site is not located within either nationally or locally designated sites for nature conservation.</p>
	<p>The ES should include an assessment of the impacts on lower plants. If there is potential habitat on site for lower species of conservation value on the site field surveys may be required.</p>	<p>See Chapter E – Surveys have been carried out and are reported in the chapter.</p>
	<p>An update of the 2007 intertidal and subtidal surveys should be included in the ES. This should initially be a desk study to identify, what, if any significant changes to the habitats have taken place since 2007, and the likely consequences of these changes on the intertidal and subtidal communities.</p>	<p>See Chapter E – The intertidal survey was updated in July 2010. Natural England has agreed that sub-tidal surveys are not required to inform the ES.</p>
	<p>Updates to bat and dormice surveys should be included within the ES, detailing the changes in habitats since 2004 and the likely effects of changes on the probability of the site supporting bats and dormice. The updates should be used to inform a decision as to whether further surveys are required. Particular attention should be paid to potential bat roosts, in existing buildings on site and in trees. Surveys of potential bat roosts will be required.</p>	<p>See Chapter E – Bat and dormice surveys have been updated and new surveys carried out between March 2009 and August 2010.</p>
	<p>The ES will need to consider the potential impacts of any proposed cliff stabilisation works that are required as part of the development.</p>	<p>See Chapters E and K. Cliff Stabilisation works described in Chapter C.</p>

Respondent	Summary of Issue Raised	Location in ES/Response from CEG team
<p>Natural England (12/08/10) - CONT</p>	<p>Important to ensure the proposed development and sea defences are in line with the policy framework and proposed coastline management for that areas as set out in the existing Cornwall Shoreline Management Plan, and emerging SMP2. Any planning permission will need to have regard to the Cornwall Shoreline Management Plan 2 and provisions for coastal access.</p>	<p>See Chapter D and Planning Statement. The SMP2 acknowledges the extant planning permission and the socio-economic benefits. While the policy for Carlyon Bay is 'no active' intervention, this relates to public expenditure. CEG will be responsible for any maintenance.</p>
	<p>Important to identify opportunities for enhancement and adding to biodiversity interests and for opportunities to contribute towards targets for UK BAP Habitats and/or Species.</p>	<p>See Chapter E and Landscape Masterplan– A range of new habitats will be incorporated into the scheme that will maintain and enhance biodiversity.</p>
	<p>Important to assess landscape and visual impacts on the Cornwall AONB. In assigning significance or sensitivity to the landscape, in LVA, expect all protected landscapes, including AONB would be assigned the highest level of sensitivity.</p>	<p>See Chapter J</p>
	<p>Assessment of impacts of proposals on the landscape should be underpinned by the use of landscape character assessments in accordance with the methodology set out in Landscape Character Assessment: Guidance for England and Scotland Countryside Agency and Scottish Natural Heritage and the LVIA to adopt the methodology detailed in the Guidelines for Landscape and Visual Impact Assessment.</p>	<p>See Chapter J</p>
<p>Environment Agency (05/08/10)</p>	<p>The ES should consider the effect of the proposal on water quality of the Sandy River and two designated Bathing Beaches; Crinnis Leisure Beach and Crinnis Golf Links.</p>	<p>A water quality assessment has been undertaken and is included in Chapter D</p>
	<p>The Construction Site Management Plan should use the EA's new version of PPG6 and include biodiversity opportunities into sustainable construction. The CEMP should be produced to identify how emissions, air, soil and water will be managed and to identify measures to protect biodiversity during construction. Recommend ES is scoped so the temporary impacts of the construction phase and easily distinguished from the impacts of the operational phase/later restoration.</p>	<p>Refer to Cornwall Council Scoping Opinion at Appendix B2. See each chapter of ES for details of construction and operational phases.</p>

Respondent	Summary of Issue Raised	Location in ES/Response from CEG team
Environment Agency (05/08/10) - CONT	The ES should consider the demolition and decommissioning of the site if it is no longer viable after the proposed design lifetime of the sea defences which is 100 years	See Chapter C – not considered relevant
	The Flood Risk Assessment (FRA) must establish the extent of Flood Zones on the site prior to development.	See Chapter D and appendices – This has been done with reference to flood zones identified in SMP2 and the Cornwall Strategic Flood Risk Assessment (SFRA).
	The flood risk assessment needs to identify the means of addressing overtopping to Shorthorn defence and should identify those areas where built development would not be appropriate.	See Chapter D and appendices – Testing has confirmed areas for development and areas for flood water storage and drainage.
	The ES should include the effect on the marine environment with regard to effect on water quality (most importantly during construction). This should be cross referenced to the water resources section.	See Chapter D and appendices
	Encourage river restoration where there is opportunity. Proposals for works to the Sandy River could provide this opportunity and the ES should consider this.	See Chapters C and D and appendices
	The master plans should show how Green Infrastructure is designed into the scheme to provide wild life habitat and the movement of people and wildlife across the site.	See Chapter C and Appendix to E
Highways Agency (28/07/10)	An assessment of transport related impacts of the proposal should be carried out and reported as described in the current DfT 'Guidance on Transport Assessment'.	See Chapter G
	Environmental impact arising from any disruption during construction, traffic volume, composition or routing change and transport infrastructure modification should be fully assessed and reported.	See Chapter G
	Adverse change to noise and to air quality should be considered, including in relation to compliance with the European air quality limit values and/or in local authority designated Air Quality Management Areas (AQMAs).	See Chapters G, H and I

Respondent	Summary of Issue Raised	Location in ES/Response from CEG team
Highways Agency (28/07/10) - CONT	No new connections are permitted to the Highways Agency drainage network	Matter dealt with in Utilities Statement submitted to accompany the planning application. Not an issue for the ES.
	Development must not lead to any surface water flooding on the SRN carriageway	Matter dealt with in Utilities Statement submitted to accompany the planning application. Not an issue for the ES.
	The impact of the development on the operation of the A30(T) in this location should be demonstrated. Specific assessment should consider the operation of the Blue Anchor (Penhale), Summercourt, Highgate Hill and Innis Downs Junctions. Any adverse impact on these junctions will require appropriate mitigation.	See Chapter G for consideration of this issue
Cornwall RIGS Group (30/07/10)	Most of the issues discussed are of no concern. Pleased to see recognition of the two County Geology Sites (RIGS) at either end of site and that no proposed development will directly affect them.	Noted, see Chapter K
	Access to the western County Geology Site through the proposed development needs to be maintained. Access to the eastern site will normally be from the Coast Path and not through the proposed development.	See Chapter C - Scheme allows easy access to Geology Site
	Attempts to establish a discharge point further west on Shorthorn Beach have consistently met with problems due to beach drift, particularly after storms blocked the river discharge point and caused flooding of the area behind.	See Chapter D
	The material forming the beach should be referred to as 'sand and gravel' (BS 1377 refers).	The majority of the beach sediment in these bays is a by product of mining and quarrying, particularly china clay, brought down to the coast by rivers. This was agreed at the Public Inquiry into the proposed Sea Defences
	The use of the term 'stent' in the report is incorrect. 'Stent in local mining parlance is the residue of large rocks (usually of cobble or boulder size) left after the ground has been washed for china, clay or tin. The material forming the beach at Carlyon Bay is not stent, it is a mixture of sand and gravel.	The majority of the beach sediment in these bays is a by product of mining and quarrying, particularly china clay, brought down to the coast by rivers. This was agreed at the Public Inquiry into the proposed Sea Defences

Respondent	Summary of Issue Raised	Location in ES/Response from CEG team
Cornwall RIGS Group (30/07/10) - CONT	Much of the material forming the beach arose from metalliferous mining at Carclaze tin mine, Charlestown United tine mine and Wheal Eliza tin mine. It is wrong to attribute it entirely to china clay mining. Mitchell's famous 1841 engraving of Carclaze pit, shows it functioning as a tin mine.	The majority of the beach sediment in these bays is a by product of mining and quarrying, particularly china clay, brought down to the coast by rivers. This was agreed at the Public Inquiry into the proposed Sea Defences
	Query why the proposed ES does not cover cliff falls which are a hazard at the County Geology Site.	See Chapter K and description of proposed cliff stabilisation works in Chapter C
Carlyon Bay Watch Ltd (26/07/10)	Consider the ES should include a full marine survey with particular regard to the eel grass beds.	See Chapter E
	The principle of permanent residential development must be addressed in the process	Planning issue – refer to Planning statement. See Chapter F for consideration of effects.
	The maximum heights of the buildings will obscure views of the sea from the cliff and of the cliffs from the sea. The height of the buildings should not be compared to indeterminate and varying levels.	See Chapter C for description of development and Chapter J for explanation of process of visual impact assessment
	There should be a clear quantification of the effect of construction	See Chapters D to M – construction and operational effects are considered separately throughout the ES.
	The Developer should consider and put forward the different effects of treating the site by way of a 'Managed Adaptive' approach and by way of a 'Precautionary' approach (as indicated in 'Flood and Coastal Defence Appraisal Guidance, PCDPAG3 Economic Appraisal, Supplementary Note to Operating Authorities – Climate Change Impacts October 2006, issued by DEFRA)	See Chapter D – A precautionary approach has been adopted – the design has developed including full allowance for climate change over the design life.
	Consider the Transport Assessment should be extended to include Taphouses, Bugle and Lostwithiel	Cornwall Council Highways have agreed that the TA does not have to be extended to include Taphouses, Bugle and Lostwithiel. See Chapter G – the scope of the Transport Assessment has been agreed with Cornwall Council Highways Officers and the Highways Agency
The Transport Assessment must assess the incremental traffic movements for the Eco-towns, Par Docks	See Chapter G	

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B3.0 EIA Process & Difficulties

- B3.1 The EIA considers the likely effects based on current knowledge of the site and surroundings, desk top assessment, survey and fieldwork and information available to the EIA team. Regard is also given to relevant national, strategic and local planning policy and other legislation of relevance to individual topic areas. This topic specific guidance is considered in further detail within individual chapters of the ES.
- B3.2 The EIA has been completed with reference to best practice and relevant legislation and has addressed all those matters that could reasonably be required to assess the effects of the proposed development. This includes those arising from the scheme itself as well as those temporary effects arising during the construction phase.
- B3.3 An extensive amount of information has been available to establish the baseline position for the site and for consultation and assessment of the likely significant impacts by the EIA team. The development of the design has emerged from an iterative process of assessment and development between the design and EIA team. The scheme for which planning permission is sought incorporates those revisions or modifications that are necessary or appropriate to avoid or minimise significant adverse effects on the environment. Where 'built in' mitigation is taken into account in the technical assessments, this is identified.
- B3.4 Following the Council's formal consultation on the planning application and associated ES, new issues may emerge or practices identified which may affect the findings in this ES. Throughout the ES, the difficulties in compiling information and testing impacts or the assumptions that have been adopted are noted explicitly.
- B3.5 Examples of such difficulties include:-
- 1 Information being unavailable to the team or necessity to rely on reasonably available data in carrying out the EIA.
 - 2 Assessment of construction is based on broad parameters ahead of appointment of a contractor. Potentially different construction programmes may be identified which may lead to an earlier start on site than identified or potentially leading to differences to the length of the construction period. These variables cannot be clarified at this stage but sufficient information is available to be able to assess the likely worst case scenario.
 - 3 Availability of accepted methodologies (e.g. there is no generally accepted criteria for assessing the significance of impacts on socio-economics and the community). In these situations, professional judgement, experience and agreement of other forms of assessment have been relied as the basis of EIA.

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B4.0 Consultation

Introduction

- B4.1 Consultation has fed into the process of EIA in three different ways:-
- 1 responses to consultation on the scope and methodology for the assessment (as summarised in section B2.0 above);
 - 2 responses from consultees on specific issues mainly as the process of EIA and design development has progressed;
 - 3 responses from consultation carried out in relation to environmental matters including as part of public consultation.
- B4.2 The consultation relating to the EIA has focused on:-
- 1 seeking views and agreement to the overall scope of the EIA and the methodologies being undertaken;
 - 2 obtaining relevant environmental data required to assist in the EIA;
 - 3 discussion of potential significant impacts identified as part of the assessment and the proposed mitigation measures that could eliminate or reduce those adverse effects; and
 - 4 a means to ensure that interested bodies including the local community are informed of the EIA process undertaken and the findings.
- B4.3 Cornwall Council, statutory consultees, the local community and other key stakeholders have been engaged by CEG throughout the process of EIA. A Planning Performance Agreement (PPA) between Cornwall Council and CEG was agreed in June 2009 which set out the process by which pre-application consultation would take place. The engagement has involved meetings, a public exhibition and via written correspondence. This section summarises how the views obtained have been built into the environmental decision making process for the site.
- B4.4 Details of the process are also provided within the Statement of Community Involvement which has been submitted to accompany the planning application to assist CC in their consideration of the proposals.

The Process of Engagement

- B4.5 CEG recognises the importance and value of consultation and has carried out extensive consultation has been undertaken with interest groups, public bodies and local residents both as part of the EIA and design process. Consultation has been in a number of different formats:-
- 1 Pre-application discussions and regular project meetings with Council officers (planning and highways officers) to discuss the design and layout of the scheme and the issues to be addressed as part of the EIA;

- 2 Meetings and discussions with statutory consultees in respect of the EIA including Natural England, Highways Agency, Environment Agency, Cornwall Council Officers (including transport, ecologists (terrestrial and marine) environmental health, landscape, natural resources, economic development, historic environment services), Cornwall Wildlife Trust, South West Tourism, Government Office for South West, South West Regional Development Agency, Cornwall Council (Waste Projects and Awareness Officer), private waste management contractors;
- 3 Public Exhibition held over the periods 8 to 10 October 2009 (The Beach Information Centre) and 30 to 31 October 2009 (The Engine Rooms, St Austell Town Centre);
- 4 Second Public Exhibition held between 24 and 26 June 2010 (The Beach Information Centre) and 25 June 2010 (The Engine Rooms, St Austell Town Centre);
- 5 Third Public Exhibition, held on 18 and 20 November (The Beach Information Centre) and 19 November 2010 (Cornwall College, St Austell);
- 6 Establishment of Liaison Group 1: attended by local councillors, amenity/residents groups, CEG and its representatives;
- 7 Establishment of Liaison Group 2, attended by Cornwall Council, other public bodies, local Councillors, Chamber of Commerce, CEG and its representatives; and
- 8 Various meetings and presentations with Cornwall Council Officers and members, and parish Councillors.

B4.6 Appendix B5 contains information from the exhibitions and additional information from the process of consultation outside of the process of scoping the EIA identified above. Individual chapters of the EIA also describe details of consultation in respect of individual inputs into the EIA and, where appropriate, correspondence and details are appended to those chapters.

B4.7 In addition to those issues considered in section B2.0 above which relates to the scoping of the EIA, the key issues raised during the above consultation of relevance to the EIA are provided below.

Response to Process of Engagement

B4.8 CEG and the project team have sought to ensure that issues raised during the process of consultation relating to the EIA have been incorporated into the scheme as part of an iterative process. Key issues are summarised below and more detailed consideration is provided in individual chapters to this ES.

Position and Design of Sea Defences

B4.9 Following an initial decision to set back the line of the sea defences from a position identified in the extant scheme and envisaged as part of the 2005 planning application for sea defence, ongoing discussions with the Environment Agency took place in relation to the position and design of the sea defences.

An ongoing iterative process of 3D modelling, testing and consultation as part of the preparation of the Flood Risk Assessment and EIA has led to the form of the sea defence proposals forming the basis of the current proposals.

- B4.10 Discussions with the local authority and key local stakeholders also identified an aspiration for a 'softer' and less dense approach to development on Shorthorn than that identified in the extant scheme with the objective of securing visual, accessibility and biodiversity benefits on this part of the site. The omission of hard defences on Shorthorn has formed a direct response to this aspiration and the approach has been subject to further modelling, testing and consultation with the Environment Agency.

Development limited to two beaches

- B4.11 Consultation and assessment identified that the biodiversity assets at Polgaver and a desire to reduce potential visual effects of development farther from Crinnis (where the majority of previous built development had occurred) has led to the proposals for Polgaver focusing on the creation of new ecological and recreation features with none of the proposed residential floorspace proposed for this part of the site.
- B4.12 The creation of a podium, below which car parking and services can be located, have maximised the potential for built development at Crinnis in direct response to this issue.

Position of development in relation to the cliff

- B4.13 The geological and biodiversity features associated with the cliffs have led to a gap being proposed between the cliff and start of built development for Crinnis and Shorthorn. Consultation has taken place from a number of viewpoints to understand the relationship between the maximum height of the built development and the cliffs to the rear of the site to ensure that any negative effects on key views are minimised.

Transport/Access

- B4.14 Significant ongoing discussions have taken place with the local highways authority and the Highways Agency in respect of the potential traffic impact that may arise from the scheme and a range of proposals are incorporated into a draft Travel Plan to address the issues identified.
- B4.15 Following discussions with St Blaize Council and local resident groups, a pedestrian access route is proposed from Polgaver to the coastal path as well as the retention of existing public footpaths at the Crinnis end of the site. Following the exhibitions and feedback from public consultation the proposals were designed to provide improved public access to the beach.

Design Development

- B4.16 The proportion of development between Crinnis and Shorthorn has evolved through discussions with Cornwall Council to the current proposal for 70% of built development at Crinnis with 30% at Shorthorn. This is in direct response to potential visual effect of the development and an associated desire to minimise development the farther from the Crinnis end of the site.

Waste

- B4.17 The design has been influenced by existing arrangements and in accordance with future aspirations of Cornwall Council that have been identified through ongoing discussions. All waste equipment has been specified in accordance with the capabilities of private waste management contractors who have been consulted as part of the EIA.

Sustainability

- B4.18 The sustainability strategy for the site has been identified through discussions with a number of groups and interested parties and the team has worked hard to integrate a number of sustainable measures into the scheme as identified in Chapter C. The incorporation of measures seeks to minimise the environmental effects of the scheme and ensure that it accords with the principles of sustainable development.
- B4.19 The design will incorporate a number of features that are deigned to compensate for impacts upon biodiversity and provide new habitats. Features include new nesting opportunities/brown roofs/lighting designed to reduce impact upon nesting birds and bats.