

**Carlyon Bay
Environmental
Statement (2011)**

Chapter M

Cultural Heritage

February 2011

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Contents

M1.0	Introduction	1
M2.0	Policy Context	3
M3.0	Assessment Methodology & Significance Criteria	7
	Prediction and Evaluation of Effects	7
	Significance Criteria	9
	Consultation	11
M4.0	Baseline Conditions	13
M5.0	Potential Effects	17
	Introduction	17
	Baseline 1 – Existing Site	18
	Baseline 2 – Extant Permission	21
M6.0	Mitigation Measures	25
	Introduction	25
	Baseline 1	25
	Baseline 2	26
M7.0	Residual Effects	27
	Introduction	27
	Baseline 1	27
	Baseline 2	27
M8.0	Summary & Conclusions	29
M9.0	Abbreviations	31
M10.0	References	33

M1.0 **Introduction**

M1.1 This chapter has been prepared by Nathaniel Lichfield and Partners (NLP) to examine the environmental effects of the development proposals for Carlyon Bay on cultural heritage assets in the surrounding area.

M1.2 The term cultural heritage is used to describe valued components of the physical environment that reflect human activities, ideas and attitudes. This assessment considers both above ground cultural heritage (e.g. listed buildings, conservation areas, scheduled monuments and registered parks & gardens) and archaeology (i.e. remains of human activity, all or parts of which are now totally or partially buried).

M1.3 In assessing impact on cultural heritage assets there is a need to consider:

- 1 Direct impacts or loss of sensitive cultural heritage assets (e.g. through demolition, disturbance, alteration, or construction); and
- 2 Indirect impacts on assets of cultural heritage (i.e. changes in setting).

Approach to Cultural Heritage

M1.4 This chapter of the Environmental Statement comprises:

- 1 A review of relevant policy context and guidance which, given the nature of this application and its site primarily relates to the 'setting' of heritage assets;
- 2 the methodology for the assessment of environmental effects on cultural heritage assets;
- 3 identification of sensitive heritage assets that may be directly or indirectly affected by the proposals and a description of their significance;
- 4 A description of the role that the site plays in relation to identified heritage assets (Baseline 1) and the role of the site incorporating the Extant scheme (Baseline 2);
- 5 A prediction of the changes that will occur as a result of the proposed development (during construction and after completion) and an evaluation of the environmental significance of those changes on the cultural heritage resource - whether adverse, neutral or beneficial;
- 6 A description of the mitigation proposed as part of the detailed design of the scheme and other measures identified to offset any adverse effects; and,
- 7 Identified any residual significant adverse environmental effects.
- 8 Summary and conclusions.

M1.5 A list of references and schedule of abbreviations are provided at the end of the chapter. Technical Appendix M1 in volume III contains figures referred to in

this chapter. Technical Appendix M2 comprises an Archaeological Baseline Assessment for the site.

Relationship to Other Chapters

M1.6

This chapter should be read in conjunction with the Landscape and Visual Effects chapter (Chapter J) as the existing and proposed role of the site in views will closely follow the assessment of the indirect effects of the proposed development on the setting of heritage assets.

M2.0 Policy Context

Town and Country Planning (Conservation Areas and Listed Buildings) Act 1990

M2.1 The Act sets out the legislative framework within which development affecting listed buildings and conservation areas must be considered. This states that, in considering an application for planning permission for development affecting the setting of a listed building, the decision maker should have:

“special regard to the desirability of ... preserving the setting” (s. 66)

M2.2 In exercising the planning function with respect to Conservation Areas:

“...special attention shall be paid to preserving or enhancing the character and appearance of that area.” (s. 72)

PPS1:- Delivering Sustainable Development (2005)

M2.3 This document emphasises the importance of the design of new buildings. The document notes that planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:-

“protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities;”(paragraph 5)

PPS5:- Planning for the Historic Environment (2010)

M2.4 The statement identifies that one of the Government’s key aims is that *“...the historic environment and its heritage assets should be conserved and enjoyed for the quality of life they bring to this and future generations.”*(paragraph 7). When considering applications for development that affect the setting of a heritage asset, local authorities should treat favourably applications that preserve those elements of the setting that make a positive contribution to the asset (Policy 10.1).

M2.5 It advises that local planning authorities should seek to identify and assess the particular significance of any element of the historic environment that may be affected by a proposed development, this includes development that would affect the setting of a heritage asset (policy HE7.1).

M2.6 Policy HE9.1 states that the significance of a heritage asset can be harmed or lost as a result of development in its setting, and that any such loss or harm requires clear justification. Harm or loss is identified as being ‘substantial’, should be ‘exceptional’ in relation to grade II listed buildings, parks and gardens and ‘wholly exceptional’ to scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings and grade I and II* registered parks and gardens, and World Heritage Sites.

Local Policy Context

M2.7 The Development Plan for the site includes saved policies within the Restormel Borough Council (RBC) Local Plan (October 2001).

Restormel Borough Council Local Plan

M2.8 The Restormel Local Plan contains a number of policies relating to protecting the borough's heritage. Policy 11 provides an overarching aim to "... conserve and enhance the landscapes, features and habitats of heritage importance within the Borough".

M2.9 Policies 25, 26 and 27 relate to protection of scheduled ancient monuments and archaeological remains. These policies confirm that development proposals which damage nationally recognised heritage assets or their settings will not be permitted (Policy 25). Sites on the Local Archaeological Record should be preserved in-situ unless the importance of the development outweighs the case for preservation (Policy 26). In all cases where there is evidence to suggest significant remains may exist and archaeological assessment should be carried out before planning permission is granted (Policy 27).

M2.10 Policy 29 seeks to protect Historic Parks and Gardens of National Importance' from "*insensitive development proposals*" which would result in harm. In addition, development affecting local historic parks and gardens should "*have regard to conservation of character of the garden*".

M2.11 Policy 31 regarding Conservation areas states that "*Development ... will only be permitted where it preserves or enhances the character and appearance of such areas*". The policy does not provide specific reference to development within the setting of a conservation area. In relation to listed buildings, development will not be permitted under policy 33, if it "*...conflicts with the preservation or enhancement of listed buildings, their settings and feature.*"

Local Development Framework

M2.12 A topic based paper on the historic environment has been prepared to provide evidence to inform the Council's Core Strategy. The paper suggests that the Core Strategy should explore ways to provide appropriate protection and enhancement for international, national and local sites of importance as well as the wider historic environment.

Other Guidance / Background Documents

M2.13 A number of other documents have been reviewed and are referred to in the baseline description and the impact assessment of this chapter. These documents include:

- 1 Polkerris Conservation Area Appraisal, Cornwall Council (April 2010)
- 2 Charlestown Village Design Statement, Restormel Borough Council (1996)

- 3 Duporth Village Development Brief, Restormel Borough Council (February 2006)
- 4 English Heritage, The setting of heritage assets: English Heritage guidance (Consultation Draft) August 2010;
- 5 Communities and Local Government Circular 07/2009 (DCLG), Circular on the Protection of World Heritage Sites (24 July 2009); and,
- 6 Institute for Archaeologists' Standard and Guidance for Archaeological Desk-Based Assessment (2008).

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M3.0 **Assessment Methodology & Significance Criteria**

The Baseline

- M3.1 The baseline identifies the sensitivity of relevant heritage assets and establishes the role of the existing site (Baseline 1) as either part of the heritage asset or part of its setting. The role of the extant permission is set out as a second baseline using available plans and elevations (baseline 2).
- M3.2 The current role of the site in the setting of a cultural heritage asset in baseline 1 and 2 depends on its scale, proximity and context. The role of the site has been categorised as being either **high** (the site plays a major role in the setting), **medium** (the site plays a notable role in the setting but is not the main element), **low** (the site plays a minor role in the setting), **very low** or **nil**. The nature of that role is then classified as positively contributing to the significance of the heritage asset, neutral or detracting from the significance.
- M3.3 The role of the site in the setting of a heritage asset can relate to more than inter-visibility and also takes account of historic associations between the site and the heritage asset where these exist. Changes to the setting of a heritage asset are therefore considered in terms of their overall effect on the significance of the heritage asset. Where there is no visual or historical association between the application site and the heritage asset the site is considered to have a 'nil role' in the setting.
- M3.4 In relation to the below ground archaeological resource the Archaeological baseline assessment (AB Heritage, 2010; Appendix M2) established the value of known archaeology, identified through examination of a range of sources that included the Cornwall & Sicily Historic Environment Record. It also established the potential for the recovery of currently unidentified archaeological deposits within the limits of proposed development.
- M3.4.1 The importance of already identified archaeological resources is then determined by reference to existing designations. For previously unidentified sites, where no designation has been assigned, an estimate was made of the likely value of the resource, based on professional knowledge and judgement.

Prediction and Evaluation of Effects

Magnitude of Change

- M3.5 Effects on heritage assets can be either direct or indirect. Where the site forms part of the setting of a heritage asset its role is described as indirect. This indirect role is primarily visual, however, it can also relate to other physical features, such as noise and vibration, or historic associations (PPS5 Companion Guide, para 114). In relation to this project for Carlyon Bay, the magnitude of change to heritage assets primarily relate to indirect effects to

the setting of listed buildings and other areas of recognised historic or architectural significance.

- M3.6 For indirect effects the analysis predicts how the setting of the heritage assets will change as a result of the development proposals. This will assess a worse case scenario of outline development parameters for the site. A combination of photographs, photomontages, application drawings (contained in Appendix M1), and the author’s expertise has been used to predict and evaluate the change. Consistent with PPS5 Practice Guide, the magnitude of the change is dependant upon the relationship of the heritage asset to the site as matters such as the scale, height, mass, alignment and materials of the proposed development in relation to its context.
- M3.7 To assess the direct effects on heritage assets the analysis considers the extent to which the fabric of the asset would be changed/altered/lost as a result of the development proposals. This will examine a worst case scenario.
- M3.8 As part of the cumulative assessment, the magnitude of change also includes commentary, as far as it is known, on the scale/extent and magnitude of change resulting from other likely development within the area in combination with the proposed development.
- M3.9 For this assessment the magnitude of change will be judged with reference to the following classifications:

Table M3.1 Classification of Magnitude of Change

Classification	Magnitude of change to a heritage asset or its setting
High	Very large change to the heritage asset significance. Alternatively development may become the dominant feature in the setting introducing a major new component as a result of scale, prominence, proximity or location.
Medium	The proposals result in a visible and recognisable change to the heritage asset significance. Alternatively development may result in a notable new element in the setting.
Low	The proposals would affect a relatively small component of the heritage asset and are unobtrusive/have minor effect on heritage asset significance. Development may be seen at a distance in context of similar developments and/or screening effects limit amount of development seen. Alternatively, development may result in a minor change to the setting or may replace existing development in the setting with buildings of the same or a similar scale.
Negligible/ Zero	Indistinguishable or no change to heritage asset significance. Change to setting imperceptible or nil.

Source: NLP

Sensitivity

M3.10 A heritage asset's sensitivity to change in setting is considered to correlate to the significance of the heritage asset. For the purposes of this assessment the following classifications of sensitivity are used:

Table M3.2 Classification of Sensitivity of Heritage Assets

Classification of sensitivity	Heritage Asset
Very high	Scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings and grade I and II* registered parks and gardens, and World Heritage Sites. Likely to have few detracting or incongruous elements in their setting and be highly sensitive to prominent new elements by virtue of their position or scale.
High	Grade II listed buildings parks or gardens. Heritage asset setting is sensitive to new elements. May also include changes to the setting of assets which are of very high sensitivity, where there are existing notable incongruous or detracting elements in the setting.
Medium	Locally listed buildings, parks and gardens. This includes archaeological assets of a reasonably defined extent and significance, or reasonable evidence of occupation / settlement, ritual, industrial activity, etc. Setting may contain detracting elements and may be reasonably tolerant of change.
Low	Non-designated heritage assets. Potentially identified locally at time of assessment. This includes archaeological evidence more limited in historic value than the examples above, or compromised by poor preservation and/or survival of context associations, though which still have the potential to contribute to local research objectives. May be tolerant of change with potential scope for positive enhancement of setting.
Negligible /zero	Buildings or assets with little or no surviving cultural heritage value.

Source: NLP

M3.11 Heritage assets which have not been identified by the LPA or interest groups through the scoping request or previous assessments are not considered to be relevant sensitive receptors in relation to the proposed development and have not therefore been tested.

Significance Criteria

M3.12 Environmental significance is assessed through consideration of the sensitivity of the heritage asset and the magnitude of change to its setting or directly to the heritage asset.

Table M3.3 Significance Matrix

		Magnitude of Change			
		Zero/negligible	Low	Medium	High
Sensitivity	Zero/negligible	Nil	Nil	Nil	Nil-slight
	Low	Nil	Slight	Slight-moderate	Moderate
	Medium	Nil	Slight-moderate	Moderate	Moderate-Substantial
	High	Nil-slight	Moderate	Moderate-Substantial	Substantial
	Very high	Nil-slight	Moderate-Substantial	Substantial	Substantial

Source: NLP

M3.13

The significance of the effect of the proposed development on the heritage asset will be examined in terms of the qualitative role of the proposed development and described as beneficial, neutral, or adverse in nature.

Table M3.4 Nature of Change from Baseline

Nature of Change	Definition
Beneficial (enhance)	The proposals would remove/replace elements or features that are inconsistent or detrimental to the prevailing character of the heritage asset or its setting.
Neutral (preserve)	No change or no significant alteration to the heritage asset or its setting.
Adverse (harm)	The proposals would be incongruous with the character of the heritage asset or its setting. They would have an adverse impact resulting in harm to or loss of the heritage asset.

Source: NLP

M3.14

The judgement of the nature of effect and whether the proposed development either harms, preserves or enhances the significance of the heritage asset is made in relation to the role of the site in the baseline. This judgement includes consideration of the scale, height, massing, alignment, materials and use of the proposed development using guidance within PPS5 Policy HE7.5.

M3.15

A standard terminology for the significance criteria is used in this assessment. The criteria can be arranged on a scale as follows:

- 1 Substantial beneficial
- 2 Moderate beneficial
- 3 Slight beneficial

- 4 Neutral
- 5 Slight adverse
- 6 Moderate adverse
- 7 Substantial adverse

M3.16 The terminology used in the significance criteria above can be defined as:

- Substantial - considerable effects (by extent, duration or magnitude) or of more than local significance or breaching identified standards or policy
- Moderate – limited effects which may be considered significant
- Slight – Minor, very short or highly localised effects

M3.17 Effects identified as substantial adverse are considered to correlate with “substantial harm” to the heritage asset (PPS5 HE9.1). Effects identified as either moderate adverse or slight adverse are considered as less than substantial harm to the heritage asset (PPS5 HE9.4).

M3.18 The potential effects on significance resulting from the development have been assessed in relation to the existing situation (Baseline 1) and the extant permission (Baseline 2). The identified environmental effects for each baseline have been reviewed in light of proposed mitigation measures, residual environmental effects considered and conclusions drawn.

Consultation

M3.19 An important part of the assessment has been to agree with the local planning authority at an early stage the location, sensitivity and setting (visual and historic) of designated heritage assets (and non designated heritage assets, where relevant).

M3.20 Cornwall Council’s Historic Environment Services requested Cultural Heritage to be scoped into the ES on 16 July 2010 stating:

“We recommend that the scope of the Environmental Assessment should both revisit the findings of the 2003 Archaeological Assessment, clarifying the significance and likely location of the features it described. The EIA should also assess and describe the significance of the setting of Charlestown in the 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.”

M3.21 In response on 3 August a Scoping Report for the Cultural Heritage chapter was issued to Cornwall Council for consideration. The Council provided a response to the scoping request on 19th August (Appendix B2) which identified the scope of the Cultural Heritage chapter has adequately set out a methodology for assessment of Cultural Heritage effects. It was confirmed that the World Heritage Site at Charlestown should be included in the assessment and that the Grade II* listed Tregrehan house and gardens should also be included.

M3.22

In relation to the Archaeology Baseline Assessment, telephone consultation was undertaken with Dan Ratcliffe (Cornwall Council Historic Environment Advisor for Archaeology) on 13th September 2010. It was agreed that a study area for archaeological assessment would be designed that would take the cliff line of Carlyon Bay as its boundaries, given the geographic separation from the surrounding land that the cliff line imposes. The Council's Historic Environment Advisor requested that the archaeological baseline assessment be supported by a walkover, to examine known archaeological features identified on site, along with an examination of any readily available maps and documentary information held at the Cornwall Record Office.

M4.0 **Baseline Conditions**

Site and Surrounding Area

- M4.1 The Carlyon Bay site has a relatively recent history, it has accommodated a broad range of sport and leisure/tourist related activities. Planning permission for the erection of 511 holiday dwellings and the refurbishment and extension of the central entertainment and leisure facilities has been granted and works commenced on site. Further details of this history are contained in Chapter A.
- M4.2 Carlyon Bay is not located within a conservation area or an Area of Great Historic Value and there are no listed buildings within the application site.
- M4.3 The following heritage assets are located in the vicinity of Carlyon Bay as shown in Figures M2 and M3 in Appendix M1:
- 1 The closest designated conservation areas are located in Charlestown (approximately 1.5km from the western end of Crinnis) and Polkerris (approximately 2.5km from the eastern end of Polgaver);
 - 2 Charlestown is also a World Heritage Site;
 - 3 The closest part of the Menabilly registered park and garden is 2.9km from the site;
 - 4 The closest part of the Tregrehan registered park and garden is 180m from the site with the main grounds 1km from the site;
 - 5 An Archaeological Baseline Assessment (Appendix M2) has identified 13 sites of archaeological interest within or immediately adjacent to the application boundary;
 - 6 There are two scheduled ancient monuments close to St Austell Bay at Black Head (4.2km) and Castle Gotha (3.5km);
 - 7 A desk study has identified that there are a number of listed buildings within 4km of the application site (with clusters in both Charlestown and Polkerris, and more isolated buildings on the Black Head and Gribbin Head headlands);
 - 8 Porthpean House, Trenythoon House, Trenarren, Duporth and Kilmarth are identified as 'local historic parks and gardens' (RBC Local Plan, Policy 30).

The Extant Permission

- M4.4 In 1990 planning permission was granted for a mixed-use development of 511 residential holiday units and over 10,000sq.m leisure/commercial space). This was subsequently renewed in 1996 and implemented.
- M4.5 The extant permission proposed three beachfront terraces (two on Crinnis and one on Shorthorn) and a crescent block on Shorthorn. The terraces and crescent block are five storeys in height (including under-croft parking) with some taller elements marking the ends of terraces. To the rear of the terraces

on both beaches, towards the cliffs, are two/three storey residential and commercial buildings.

- M4.6 The access road on to the site including the raised access road between Shorthorn and Crinnis has been constructed as well as temporary sea defences. Areas of Crinnis and Shorthorn are currently being used for storage of construction materials.

Cultural Heritage Baselines

- M4.7 The baseline for the existing site is set out below. Where the site forms the setting of a heritage asset which is also within another designation (e.g. a listed building within a conservation area) the heritage designations are grouped for ease of reference and avoid repetition.
- M4.8 (Appendix M1 contains photographs of relevant heritage assets, location plans, and summary assessments. Photographs from the heritage assets have been taken to demonstrate the role of the site in their setting. However, these may not be the 'main' or most relevant view or line of inter-visibility to the significance of the heritage asset or contribution to that significance from the setting.

Table M4.1 Above Ground Heritage Assets

Heritage Asset	Heritage Asset type	Sensitivity	Role/nature of site in setting Baseline 1	Role/nature of site in setting Baseline 2
Charlestown	World Heritage Site Group of listed buildings (including Harbour Quays and Wall to Gun Battery) Conservation area	Very high	Nil	Nil
Polkerris	Conservation area Group of listed buildings (Grade II)	Very high	Very Low. Neutral visual role as part of wider bay setting	Very low. Negative visual role as part of wider bay setting
West Gate	Grade II listed building	High	Very Low to Zero. Neutral visual role as part of wider bay setting	Very Low. Negative visual role as part of wider bay setting
Cypress Avenue Railway Bridge	Grade II listed building	High	Very Low. Positive historical role to bay as part of route from Tregrehan House	Very Low. Positive historical role to bay as part of route from Tregrehan House

Heritage Asset	Heritage Asset type	Sensitivity	Role/nature of site in setting Baseline 1	Role/nature of site in setting Baseline 2
			and gardens to the beach	and gardens to the beach
Gribbin Head Marker	Grade II listed building	High	Very Low. Neutral visual role as part of wider bay setting	Very low. Negative visual role as part of wider bay setting
Chapel Point	Grade II listed buildings	High	Very Low to Zero. Neutral visual role as part of wider bay setting	Very Low. Negative visual role as part of wider bay setting
Castle Gotha	Scheduled monument	Very high	Very Low. Neutral visual role as part of wider bay setting	Very Low. Negative visual role as part of wider bay setting
Black Head Fort	Scheduled monument	Very high	Very Low. Neutral visual role as part of wider bay setting	Very Low. Negative visual role as part of wider bay setting
Tregrehan	Grade II* listed building and Registered park and Garden	Very high	Nil. Historical link to bay as part of route from Tregrehan House and gardens to the beach now substantially lost. No direct visual link to the site	Nil. Historical link to bay substantially lost. Taller buildings may be glimpsed above the cliffs due to elevated viewpoint

Source: NLP

- M4.9 For Baseline 1, the above table identifies that the site has a neutral role in the setting of the heritage assets; this is only where there is a visual link. This visual link forms only a part of the much wider setting of the heritage asset. The much wider setting includes St Austell Bay and other significant elements such as the urban areas of St Austell and St Blaise, Par Harbour, and cliff top properties in Carlyon Estate. The beach and cliffs are identified as positive elements in the setting but are offset by detracting elements on the site including, derelict buildings and temporary rock armour sea wall and the negative effects of existing development in the setting (St Austell, etc.). The site has a very low positive historical role (no direct visual link to the site) in the setting of the Railway Bridge as part of a historic route to the beach, which is now substantially changed. The site has a no role in the setting of Tregrehan House and gardens or Charlestown.
- M4.10 For Baseline 2 the site has a minor negative visual role in the setting of heritage assets, where this role is a visual link as part of the bay. This is due to the 4/5 storey white buildings on the beach front drawing the eye and distracting from reading the cliffs as a continuous element round the bay (Par

Harbour already substantially detracts from the wider bay setting). The site has a very low positive historical role in the setting of the Railway Bridge. The site has no role in the setting of Tregrehan House or Charlestown.

M4.11

The Archaeological Baseline Assessment (Appendix M2) identified a number of known features, along with a level of archaeological potential. These features, which are given the same reference number used in the baseline report, are listed below.

Table M4.2 Archaeological Assets within and in Close Proximity to Site

Heritage Asset	Heritage Asset type	Sensitivity
Post-medieval Adit [AB 8] in the base of the north-western cliff wall of Shorthorn	Industrial Activity: Non-Designated	Negligible
Modern Tin stream working [AB 10], c. 30m to the east of the Adit [AB 8] on Shorthorn	Industrial Activity: Non-Designated	Negligible
Modern Surface Mining [AB 6] along the western cliff wall of Shorthorn	Industrial Activity: Non-Designated	Negligible
Two Modern adits [AB 13] at the base of the northern cliff line of Crinnis	Industrial Activity: Non-Designated	Negligible
World War II beach defences [AB 1, 2, 4, 5, 7 & 11] constructed on top of the cliffs of Carlyon Bay	Military Activity: Non-Designated	Negligible
Heavily dilapidated remains of Cornish Leisure World [AB 3] on Crinnis, first constructed as the Cornish Riviera Club in the 1920's	Entertainment Activity: Non-Designated	Negligible
Archaeological Potential: Low background archaeological potential for the recovery of buried 19th century mining or stream workings close to the northern cliff line of Crinnis and Shorthorn	Archaeological Potential: Non-Designated	Negligible
Archaeological Potential: Low potential for recovery of complex buried remains associated with modern use of the site for entertainment purposes, including foundations of now demolished features of the Cornish Riviera Club.	Archaeological Potential: Non-Designated	Negligible
Archaeological Potential: Low potential for recovery of buried palaeo-environmental remains parallel to the northern cliff faces of Shorthorn and Polgaver.	Palaeo-environmental Potential: Non-Designated	Low

Source: ABH

M5.0 Potential Effects

Introduction

- M5.1 Environmental significance is assessed through consideration of the sensitivity of the heritage asset and the magnitude of change to the heritage asset (direct) or to its setting (indirect). The significance of the effect of the proposed development on the heritage assets will also be examined in terms of the qualitative role of the proposed development and described as beneficial, neutral, or adverse in nature.
- M5.2 A judgement as to whether the proposed development will on balance result in any substantial adverse environmental effect, in comparison to the existing situation (Baseline 1), will be made taking all of these factors into account. A second judgement regarding the environmental effects in relation to the extant permission (Baseline 2) will also be provided.
- M5.3 Effects identified as being substantial adverse are considered to correlate with “substantial harm” to the heritage asset (PPS5 HE9.1). Effects identified as either moderate adverse or minor adverse are considered as ‘less than substantial harm’ to the heritage asset (PPS5 HE9.4).

Description of Proposed Development

- M5.4 The application is submitted as a “hybrid” comprising a detailed application for the sea wall and outline parameters relating to the remainder of the scheme. In order to provide a basis for the assessment the following parameters have been used:-
- 1 Maximum development height - Below the level of the cliff top
 - 2 Development area – Line of development set by sea defences
 - 3 Development materials palette – Significant use of muted/natural colours which blend in with the surrounding landscape will be used.
- M5.5 In addition, the following key principles, which underpin the layout of the new scheme, are considered to form part of the assumptions for the assessment and will be used to inform the detailed:
- 1 Less development extent than the extant scheme;
 - 2 Cars - primarily in an undercroft;
 - 3 The layout on Crinnis will be formed around a central, pedestrian dominated street;
 - 4 Increased density on Crinnis;
 - 5 Taller buildings at the back, lower at the front - layering the elevation facing the bay;
 - 6 Less density on Shorthorn (maintaining more open space/landscape);
 - 7 Move buildings back on Shorthorn, compared to the Extant Permission;

- 8 Frontage development on Shorthorn will be 'broken up' by areas of landscaping with no more than 50% of the total frontage to be built development (a maximum of 160m);
- 9 Different character of development on Shorthorn (compared to Crinnis);
- 10 The layout will maintain key views from points along the cliff path to the sea;
- 11 Landscaping and sports activities on Polgaver, including nature reserve, tennis courts and steps connecting to footpath to Fishing Point;
- 12 Cliff stabilisation (netting and rock anchors) limited to minimum necessary to ensure site safety;
- 13 Maximum height of flues 3m above maximum building heights;
- 14 Green/brown roofs on at least 25% of buildings including those located to the rear of Shorthorn;
- 15 Building materials will use traditional construction method and local materials; and
- 16 A muted palette of materials will be used which complement the wider landscape.

M5.6 As part of the construction phase of the proposed development there will be a requirement for:

- 1 tower cranes (although this is unlikely);
- 2 demolition, rubble storage and new material storage locations;
- 3 A concrete batching plant on site;
- 4 temporary lighting sufficient to provide safe lighting to construction areas;
- 5 security and safety fencing and noise screens will be used where appropriate;
- 6 diversion of Sandy River to allow construction of new river channel;
- 7 earthworks and foundations, and
- 8 existing vegetation on site will be protected where possible through the construction period.

M5.7 The effects of the proposed development are assessed against the two baselines in turn for both the construction phase and after completion.

Baseline 1 – Existing Site

During Construction

M5.8 The direct and in direct effect of the construction phase have been assessed against the site as existing (Baseline 1).

Direct Effects

- M5.9 The construction phase will occur over a 3.5 year period. During this period the main visible direct effect will be with regards to the demolition of the remaining dilapidated buildings of Cornish Leisure World (Reference AB 3 in Appendix M2) and the potential impact upon below ground remnants related to the historic development of this site. This will have a **high** magnitude of change on a resource concluded to be of **negligible** significance, resulting in a **nil/slight adverse** significance of effect.
- M5.10 While major operational works are sited away from the cliff line in the location of the adits [AB 8 & 13] and the suspected areas of tin stream-working [AB 10] and surface mining [AB 6], other works in these areas (e.g. landscaping or stabilisation works) may uncover evidence associated with such features. As above, this may create a **high** magnitude of change on a resource concluded to be of **negligible** significance, resulting in a **nil-slight adverse** significance of effect.
- M5.11 Where works are undertaken to the rear of Shorthorn there is a **low** potential for the recovery of palaeo-environmental evidence. However, given the historic formation of the beach the potential for surviving remains is yet to be confirmed. The resource, where it survives, is simply a potential record of past environmental change across the region of the British Isles. This is concluded to constitute a **low** change to a resource concluded to be of **low** significance, this would result in a **slight adverse** significance of effect.
- M5.12 There will be no direct effects on above ground heritage assets as a result of the construction phase.

Indirect Effects

- M5.13 During the construction phase the following indirect effects on above ground heritage assets have been identified:
- 1 World Heritage Site (WHS) – there will be no effect (**nil**) on Charlestown WHS as a result of the construction phase of the proposed development.
 - 2 Conservation Areas - there will be no effect (**nil**) on Charlestown Conservation Area as a result of the construction phase of the proposed development. There will be **slight temporary adverse** effects on the Polkerris Conservation Area as a result of the introduction of tower cranes (although their use is unlikely) above the height of the cliff in the wider setting of the bay.
 - 3 Registered Parks and Gardens – There will be **slight temporary adverse** effects on the Tregrehan Garden as the result of the introduction of tower cranes (although their use is unlikely) above the height of the cliff in views of the bay. The historic link between the beach and the gardens will not be affected.
 - 4 Listed Buildings – There will be **slight temporary adverse** effect on listed buildings where the site plays a visual role in the setting (i.e. Chapel Point,

West gate, Gribbin Head, listed buildings within Polkerris) due to visible construction machinery/activity. Tower cranes used during the construction period are unlikely to be visible from the Cypress Avenue Railway Bridge, there will therefore have no effect (**nil**) on this heritage asset. There will be no effect (**nil**) on listed buildings within Charlestown.

- 5 Scheduled and Ancient Monuments - There will be **slight temporary adverse** effects on Castle Gotha and Black Head as a result of the introduction of tower cranes above the height of the cliff in the wider setting of the bay.
- 6 Archaeological Heritage Assets - There will be no physical indirect effects on archaeological heritage assets as a result of the construction phase, e.g. resulting from physical deterioration of surviving receptors or chemical change to previously protected deposits.

After Completion

M5.14 The direct and in direct effect of the proposed development have been assessed for the proposed development against Baseline 1.

Direct effects

M5.15 There will be no direct effects on archaeological heritage assets as a result of the proposed development following completion of works.

M5.16 There will be no direct effects to above ground cultural heritage assets as a result of the proposed development.

Indirect Effects

M5.17 The proposed development will result in the following indirect effects on heritage assets through changes to their setting:

- 1 World Heritage Site - there will be no effect (**nil**) on Charlestown WHS as a result the proposed development.
- 2 Conservation Areas - there will be no effect (**nil**) on Charlestown Conservation Area as a result of the proposed development. There will be no change to setting of Polkerris Conservation Area as coastal landscape with existing harbours, beach level development (Coliseum) and cliff top urban development. The effect on the Polkerris Conservation Area as a result of development below the line of the cliff top and of a subdued palette of materials will by **nil**.
- 3 Registered Parks and Gardens - There will be no effect (**nil**) on the Tregrehan Garden as the proposed development will not be visible above the cliffs. The historic link between the beach and the gardens will not be affected as public access will be retained.
- 4 Listed Buildings - There will be no effect on listed buildings where the site plays a visual role in the setting (i.e. Chapel Point, West Gate, Gribbin Head, listed buildings within Polkerris). The **nil** effect due to existing built form in the wider bay setting, the limited role of new development and the use of a

muted palette of materials. The proposed development will result in no change to the historic route to Carlyon Bay, which has already been substantially altered over time from the Cypress Avenue Railway Bridge, there will therefore be no effect (**nil**) on this heritage asset as a result of the proposed development. There will be no effect (**nil**) on listed buildings within Charlestown.

- 5 Scheduled and Ancient Monuments - There will be **slight neutral** effects on Castle Gotha and Black Head as a result of a low change to heritage assets of very high sensitivity. The effect will be neutral due to a visible change being offset by existing built form in the wider bay setting, the limited role of new development and the use of a muted palette of materials on the proposed development.
- 6 Archaeological Heritage Assets - The stepped access from Polgaver up the cliff path close to Fishing Point may result in indirect effects to the World War II pillbox (Reference AB 11 in Appendix M2) on the western cliff of Polgaver. This will result in a negligible magnitude of change on a resource concluded to be of negligible significance. This would result in a nil neutral significance of effect. Apart from this there are not considered to be any other indirect effects on the archaeological resource as a result of works during the construction phase.

Baseline 2 – Extant Permission

During Construction

- M5.18 The direct and indirect effect of the construction phase have been assessed for the Extant Permission (Baseline 2).

Direct Effects

- M5.19 In relation to Baseline 2, an assumption has been made that the site has already been developed for the Extant Permission, in so much as this relates to potential disturbance of archaeological sites. Therefore, impacts on the archaeological resource would have occurred through the building out of the Extant Permission and the construction on a new ground surface would not impact the previous archaeological resource (as this would have already been truncated).

- M5.20 There will be no direct effects on above ground heritage assets as a result of the construction phase.

Indirect Effects

- M5.21 Indirect construction effects of Baseline 2 will be the same as indirect effects identified for Baseline 1.

After Completion

M5.22 The direct and indirect effect of the proposed development has been assessed against Baseline 2.

Direct Effects

M5.23 There will be no direct effects on archaeological heritage assets as a result of the proposed development assessed against Baseline 2.

M5.24 There will be no direct effects to above ground cultural heritage assets as a result of the proposed development.

Indirect Effects

M5.25 The proposed development will result in the following indirect effects on heritage assets through changes to their setting:

- 1 World Heritage Site - there will be no effect (**nil**) on Charlestown WHS as a result the proposed development.
- 2 Conservation Areas - there will be no effect (**nil**) on Charlestown Conservation Area as a result of the proposed development. There will be **moderate-substantial beneficial** effect on the Polkerris Conservation Area as a result of the reduction in visible development, the layering of built form, and the use of a subdued palette of materials in comparison to the white beach front terraced form for the Extant Permission.
- 3 Registered Parks and Gardens - There will be a **nil/slight beneficial** effect on the Tregrehan Garden as the proposed development will not be visible above the cliffs, in comparison to the Extant Permission which may have been glimpsed above the cliffs due to taller elements being located on the beach front. The historic link between the beach and the gardens will not be affected.
- 4 Listed Buildings - There will be **slight beneficial** effect on the majority of listed buildings where the site plays a visual role in the setting (i.e. Chapel Point, West Gate, and Gribbin Head) and a **moderate beneficial** effect on listed buildings which face the bay within Polkerris. This is due to the set back of the line of the Proposed Development, the layering of development up to a maximum height below the level of the cliff and the use of a muted palette of materials reducing the prominence of development. The proposed development will not be visible from the Cypress Avenue Railway Bridge and will not result in any change to the historic route to Carlyon Bay, there will therefore have no effect (**nil**) on this heritage asset. There will be no effect (**nil**) on listed buildings within Charlestown.
- 5 Scheduled Ancient Monuments – There will be **substantial beneficial** effects as a result of the proposed development on Castle Gotha and Black Head as a result of a low change to very highly sensitive heritage assets. The beneficial effect is due to the reduction in visual role of development on Crinnis and Shorthorn through setting back the development, the layering of

building heights up to a maximum height below the cliff and the use of a muted palette of materials.

- 6 Archaeological Heritage Assets - There will be no indirect effects (**nil**) on archaeological heritage assets as a result of the proposed development, as any impacts would have occurred through the building out of the Extant Permission.

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M6.0 Mitigation Measures

Introduction

M6.1 Where adverse effects have been identified in the assessment methods for mitigation of these effects is proposed as part of the development of the scheme through the Environmental Impact Assessment Process.

Baseline 1

During Construction

M6.2 The following measures will be implemented as part of the construction phase to mitigate against identified adverse direct effects on heritage assets for Baseline 1.

M6.3 Where intrusive groundworks that would remove or damage the existing landform are proposed in areas parallel to the northern cliff edge of Crinnis (in the vicinity of two adits; [AB 13]), as well as along the western and northern lines of Shorthorn, in areas where evidence for a previous adit [AB 8], tin stream-working [AB 10] and surface mining [AB 6] have been identified, it is proposed that an archaeological watching brief be undertaken, to monitor the work of construction crew and quickly record any features uncovered of archaeological interest.

M6.4 With regards to the potential impacts on the above and below ground remains of Cornish Leisure World (Reference AB 3 in M2) and other factors in the historic development of this site, the baseline report concludes that the archaeological value of this site is not primarily found in the few surviving elements, but in the more intangible contribution the site as a whole made to the social history of the region and the lives of the countless thousands who have worked, enjoyed holidays and relaxed on the beach.

M6.5 It is known that a small but important collection of information has been built up by the present owners of Carlyon Bay, ranging from electronic copies of Pathe News Reels covering the site, to old advertising posters of the Cornish Riviera Club and the later Cornish Leisure World. In addition, those working for a number of years on the Carlyon Bay development and had contact with visitors to the public information centre, have collated a breadth of personal knowledge on the site. It is suggested that a suitable mitigation strategy would comprise preservation of documentary sources of the site and would include seeking the curation of this information for future posterity.

M6.6 Finally, it is proposed that limited palaeo-environmental sampling be undertaken in a number of locations to the north of the beach on Polgaver, to establish a record of this area.

M6.7 The additional following measure will be implemented as part of the construction phase to mitigate against identified adverse indirect effects on cultural heritage assets (primarily relating to setting):

- 1 Adoption of a Construction Environmental Management Plan; and,
- 2 Protection of areas of landscaping on the site intended to be retained

M6.8 Further details of proposed mitigation of construction impacts are contained within the Carlyon Bay Construction Methodology Report produced by Davis Langdon Global Construction Consultants (December 2010, see Chapter C for details).

After Completion

M6.9 No adverse direct effects were identified to result from the completed proposed development. Therefore there is no requirement for further mitigation measures of direct effects in relation to either baseline.

Baseline 2

During Construction

M6.10 No mitigation measures are necessary in relation to the assessment of direct effects for Baseline 2.

After Completion

M6.11 No mitigation measures are necessary in relation to the assessment of indirect effects for Baseline 2.

M7.0 Residual Effects

Introduction

M7.1 This chapter has assessed the proposed development against two Baselines to identify the effects on cultural heritage assets. Residual effects of the proposed development are those likely to be experienced following implementation of the proposed development assuming all mitigation measures are included.

Baseline 1

During construction

M7.2 There will be no significant residual effects upon either above ground heritage assets or archaeological resource following proposed mitigation through the construction phase.

After Completion

M7.3 Following the detailed design of the proposed development incorporating the mitigation recommended in Section 6, there will be no significant residual environmental effects on above ground heritage assets. Detailed design and articulation of the built form of the proposed development is likely to reduce the amount of development which is evident in the setting of heritage assets in the wider setting of the bay. There will be a **slight neutral** residual effect on Castle Gotha and Black Head Scheduled Ancient monuments due to existing built form visible in setting and limited visual role of development due to muted palette of materials.

M7.4 The role of Carlyon Bay in relation to Tregrehan House and Garden has been substantially lost through late 20th century buildings and roads upgrades. The Proposed development therefore has a **nil** effect on this historic connection.

M7.5 There would be no effect (**nil**) on the Charlestown World Heritage Site, Conservation Area and listed buildings as the proposed development will not result in any change to its setting.

M7.6 There will be no significant residual effects upon the archaeological resource following proposed mitigation.

Baseline 2

During Construction

M7.7 There will be no significant residual effects upon either above ground heritage assets or archaeological resource following proposed mitigation through the construction phase.

After Completion

- M7.8 Residual effect in relation to Baseline 2, identified that the proposed development would result in **beneficial** environmental effects to Conservation Areas, Listed Buildings and Scheduled Ancient Monuments where the site forms part of the wider bay setting of these heritage assets. There would be a **nil** effect on the Charlestown World Heritage Site, Conservation Area and listed buildings. There would also be a no effect (**nil**) on the setting of Tregrehan House.
- M7.9 There will be no significant residual effects upon the archaeological resource following proposed mitigation.

M8.0 **Summary & Conclusions**

- M8.1 The proposed development for Carlyon Bay has been assessed against two Baseline conditions in order to identify potential effects on the cultural heritage from the existing site and from the “fall back” Extant Permission.
- M8.2 The effects of the construction phase against both Baseline 1 and Baseline 2 were identified as having no significant adverse environmental effects on either above ground heritage assets or archaeological resources.
- M8.3 In relation to the Baseline 1 assessment the proposed development would not result in any significant adverse environmental effects on heritage assets. The change in the setting of relevant heritage assets as a result of the proposed development is therefore not considered to harm the significance of these heritage assets.
- M8.4 In relation to baseline 2 the assessment identified that there would be a number of moderate-substantial and substantial beneficial environmental effects to heritage assets where the site formed part of the wider bay setting. The change in setting to these heritage assets is therefore considered to enhance the setting of these heritage assets in comparison to the Extant Permission.

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M9.0

Abbreviations

- 1 SAM – Scheduled Monument

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References

- 1 Town and Country Planning (Conservation Areas and Listed Buildings) Act 1990
- 2 CLG, Planning Policy Statement 1:- Delivering Sustainable Development (2005)
- 3 CLG, Planning Policy Statement 5: Planning for the Historic Environment (2010)
- 4 Restormel Local Plan (October 2001).
- 5 Cornwall Council, Topic Based Paper on the Historic Environment (2010)
- 6 Polkerris Conservation Area Appraisal, Cornwall Council (April 2010)
- 7 Charlestown Village Design Statement, Restormel Borough Council (1996)
- 8 Duporth Village Development Brief, Restormel Borough Council (February 2006)
- 9 English Heritage, The setting of heritage assets: English Heritage guidance (Consultation Draft) August 2010;
- 10 Communities and Local Government Circular 07/2009 (DCLG), Circular on the Protection of World Heritage Sites (24 July 2009); and,
- 11 Institute for Archaeologists' Standard and Guidance for Archaeological Desk-Based Assessment (2008).