



Strategic Environmental Assessment Environment Report

Looe Neighbourhood Development Plan Steering Group



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Strategic Environmental Assessment for the Looe Neighbourhood Plan

Environmental Report to accompany the submission version of the Neighbourhood
Plan

Looe Neighbourhood Plan Steering Group

January 2021



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WHAT IS STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)?

- a. A strategic environmental assessment has been undertaken to inform the Looe Neighbourhood Plan. This process is required by the SEA Regulations.
- b. Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

WHAT IS THE LOOE NEIGHBOURHOOD PLAN?

- c. The Looe Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the Cornwall Local Plan.
- d. The Looe Neighbourhood Plan will be used to guide and shape development within the Neighbourhood Plan area.
- e. It is currently anticipated that the Neighbourhood Plan will be submitted to Cornwall Council in the first half of 2021.

PURPOSE OF THIS ENVIRONMENTAL REPORT

- f. This Environmental Report, which accompanies the submission version of the Looe Neighbourhood Plan, is the second), which includes information about the Neighbourhood Plan area's environment and community.
- g. The purpose of this Environmental Report is to:
 - Identify, describe and evaluate the likely significant effects of the Looe Neighbourhood Plan and alternatives; and
 - Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.
- h. The Environment Report contains:
 - An outline of the contents and main objectives for the Looe Neighbourhood Plan and its relationship with other relevant policies, plans and programmes;
 - Relevant aspects of the current and future state of the environment and key sustainability issues;
 - The SEA Framework of objectives against which the Looe Neighbourhood Plan has been assessed;
 - The appraisal of alternative approaches for the Looe Neighbourhood Plan;
 - The likely significant environmental effects of the Looe Neighbourhood Plan;
 - The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Looe Neighbourhood Plan; and
 - The next steps for the Looe Neighbourhood Plan and accompanying SEA process.

SCOPING

- i. The purpose of scoping is to identify the important environmental, social and economic conditions and issue within Looe. This helps to focus the SEA on the big issues and presents information that helps in determining whether the effects of the Plan are significant or not. The main output of the Scoping Process is a series of environmental objectives that form the framework for assessing the impacts of the plan against thirteen objectives were established for this SEA as follows:

- Reduce the contribution to climate change made by activities within the Neighbourhood Plan area
- Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding
- Protect and enhance all biodiversity and geodiversity
- Protect and enhance the character and quality of landscapes and townscape.
- Protect, conserve and enhance heritage assets within the Neighbourhood Plan area
- Ensure the efficient and effective use of land
- Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.
- Use and manage water resources in a sustainable manner.
- Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high quality community services and facilities.
- Reduce deprivation and promote a more inclusive and self-contained community.
- Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.
- Improve the health and wellbeing of residents within the Neighbourhood Plan area.
- Promote sustainable transport use and reduce the need to travel.

ASSESSMENT OF REASONABLE ALTERNATIVE APPROACHES FOR THE LOOE NEIGHBOURHOOD PLAN

- j. During the development of the Looe Neighbourhood Plan, the Steering Group considered different approaches to guiding housing and employment development in the Neighbourhood Plan area. To support decision-making on this element, the SEA process undertook an appraisal of the different site and policy options proposed through the Plan.
- k. Cornwall Council have advised that no further dwellings need to be allocated in Looe to meet the Community Network Area baseline target. It was determined by the Steering Group that there was a strong desire for the unique character of the Town to be conserved and little appetite amongst the community for the Neighbourhood Plan to deliver significant additional levels of housing in the Neighbourhood Plan area above the Local Plan Apportionment. However, there is an ongoing need for affordable housing and some market housing demand which arises locally.
- l. In terms of employment land, the Cornwall Local Plan makes no requirements on the Looe Neighbourhood Development Area. However, the Steering Group considered that provision should be made for small scale workshop/office/research facilities which assist the growth of value-added enterprise arising as a result of the Harbour improvements, and/or provide opportunities for start-up enterprises, and grow on space for previously home-based enterprises, and/or wish to cluster with similar enterprises.
- m. To support decision-making on these elements, it was considered reasonable to explore the implications of two different and alternative approaches. These were as follows:
- Option A: Restrict development to within a development boundary which includes specific site allocations and facilitates 'exception' sites.
- Option B: Take a less restrictive approach to development which allows market forces to promote new sites.
- n. As a subset of Option A, consideration must be given to an assessment of reasonable alternative allocation sites for inclusion within a proposed development boundary.

- o. Figure 7 in the main body of the Environmental Report presents the findings of the appraisal of Option 1 and Option 2 outlined above. Figure 10 presents the findings of the appraisal of reasonable alternative allocation sites for inclusion within a proposed development boundary.

WHAT ARE THE APPRAISAL FINDINGS AT THIS STAGE?

- p. The appraisal concludes that the preferred approach should be ‘Option A: Restrict development to within a development boundary which includes specific site allocations and facilitates ‘exception’ sites’.
- q. It was agreed by the Steering group that the advantages of a development boundary outweighed the disadvantages. In particular, that they help to ensure that development is directed to more sustainable locations and that they ensure a coordinated and consistent approach to the consideration of planning applications
- r. To support decision-making when drawing up the Development Boundary and assessing where any additional sites for inclusion within the Boundary should best be located, 14 candidate land ‘cells’ around the town were assessed in an iterative process through a Local Landscape Character Assessment, and an Urban Edge Assessment to identify and exclude any cells which are unsuitable for development on any scale due to critical landscape, flooding, and biodiversity concerns. An initial shortlist of 7 cells with some potential for further investigation were then ‘sieved’ through a Heritage Assessment and further examined using 19 more detailed criteria drawn from the Sustainability Appraisal of the Cornwall Local Plan, to identify a limited number of ‘site opportunities’ within the most appropriate cells. These site opportunities were then subjected to a SWOT (Strengths / Weaknesses / Opportunities / Threats) analysis which led to the identification of a final shortlist of three sites considered to have the most potential for sustainable allocation for housing purposes, one for employment, and one for employment plus other uses. The shortlist was discussed by the Steering Group and two sites for housing and two for employment/other uses were proposed in the Pre-Submission Consultation Draft Neighbourhood Development Plan
- s. After the Regulation 14 consultation period the site assessments were further revised adding detail to the Heritage Assessment in particular, and two of these sites were removed from the Neighbourhood Development Plan for its Submission Draft version. The remaining site is 5a Land at Salter Close, Barbican.

ASSESSMENT OF THE SUBMISSION VERSION OF THE LOOE NEIGHBOURHOOD PLAN

- t. To support the implementation of the vision statement for the Neighbourhood Plan, the submission version of the Looe Neighbourhood Development Plan puts forward 57 policies to guide development in the Neighbourhood Plan area. Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the submission version of the Neighbourhood Plan.
- u. The assessment has concluded that the submission version of the Neighbourhood Plan is likely to lead to **significant positive effects** in relation to the ‘Climate Change’ SEA theme. This relates to the focus of the Neighbourhood Plan on tackling the local causes and impacts of global warming. However, this is dependent on the extent to which proposals incorporate mitigation and adaptation measures through design, along with the level of funding which is available to support schemes such as the Harbour project. The Neighbourhood Plan will also lead to **significant positive effects** in the ‘Population and Community’ SEA theme, from its policies for safeguarding and enhancing community infrastructure, facilitating the delivery of housing which meets local needs and through supporting economic vitality by enhancing the prospects for

employment locally. The Neighbourhood Plan is also likely to lead to **significant positive effects** in relation to the 'Landscape' and 'Historic Environment' SEA themes. These benefits largely relate to the Neighbourhood Plan's emphasis on protecting and enhancing the special qualities of the Town Centre and its Character Areas, supporting the quality of the public realm, and through incorporating high-quality and sensitive design through new development proposals.

- v. The Neighbourhood Plan will also bring **positive effects** in relation to the 'Health and Wellbeing' SEA theme, linked to its promotion of improved and accessible network of footpaths, enhancements to green infrastructure and open space provision to encourage active lifestyles, and the facilitation of flexible and easily adaptable dwellings for all residents. Additionally, the Neighbourhood Plan will bring **positive effects** in relation to the 'Biodiversity and Geodiversity' SEA theme through retaining habitats, enhancing ecological networks and delivering net gain. However, given the approaches taken forward through the Neighbourhood Plan will help limit potential effects from
- w. The Neighbourhood Plan will also have **positive effects** regarding the 'Transportation' SEA theme, given its focus on reducing traffic congestion, supporting a modal shift towards sustainable transport and by ensuring that new developments provide appropriate access to local services and facilities. Likewise, the Neighbourhood Plan will also bring **positive effects** for the 'Land, Soil and Water Resources' SEA theme through the implementation of objectives which seek to limit pollution and improve the environmental quality of the NDP area. However, these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.

NEXT STEPS

- x. This Environmental Report accompanies the Looe Neighbourhood Plan for submission to the Local Planning Authority, Cornwall Council, for consultation and subsequent Independent Examination.
- y. At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the current adopted Local Plan document for Cornwall.
- z. If the Independent Examination is favourable subject to modifications recommended by the Examiner, any modifications made to the Plan will be included and appraised in the final version of this SEA Environment Report. The Looe Neighbourhood Plan will then be subject to a referendum, organised by Cornwall Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be adopted. After it is adopted, the Looe Neighbourhood Development Plan will become part of the Development Plan for Looe NDP area.

Figure 1. The Looe NDP Designated Area

Looe CP

0 200 400 600 800m
Scale: 1:25000

Author:



Date:

18/09/2019



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1. INTRODUCTION

BACKGROUND

- 1.1. The Looe Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the Cornwall Local Plan.
- 1.2. The Looe Neighbourhood Plan will be used to guide and shape development within the Neighbourhood Plan area.
- 1.3. It is currently anticipated that the Neighbourhood Plan will be submitted to Cornwall Council in the first half of 2021.

FIGURE 1. KEY FACTS ABOUT THE LOOE NEIGHBOURHOOD DEVELOPMENT PLAN

<i>Name of Qualifying Body</i>	<i>Looe Town Council</i>
<i>Title of Plan</i>	<i>Looe Neighbourhood Development Plan</i>
<i>Subject</i>	<i>Neighbourhood planning</i>
<i>Purpose</i>	<i>The Looe Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Cornwall Local Plan.</i>
<i>Timescale</i>	<i>The Looe Neighbourhood Plan will be used to guide and shape development within the Neighbourhood Plan area.</i> <i>To 2030</i>
<i>Area covered by the plan</i>	<i>The Looe Neighbourhood Plan area covers the area of Looe Town Council in Cornwall (Figure 1.1).</i>
<i>Summary of content</i>	<i>The Looe Neighbourhood Development Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.</i>
<i>Plan contact point</i>	<i>Mel Colton-Dyer, Commercial Strategy Director and Town Clerk, Looe Town Council. Email address: mel@looetowncouncil.gov.uk</i>

RELATIONSHIP OF THE LOOE NEIGHBOURHOOD PLAN WITH THE CORNWALL LOCAL PLAN

- 1.4. The Looe Neighbourhood Plan is being prepared in the context of the Cornwall Local Plan¹ and will form part of the development plan for Cornwall. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local issues or add local detail to strategic policies. In this way the Local Plan provides an overall strategic direction for development in Cornwall, whilst local detail is created through the neighbourhood planning process.

¹<https://www.cornwall.gov.uk/localplancornwall>

- 1.5. The Cornwall Local Plan: Strategic Policies 2010-2030 was adopted in November 2016. This sets out the land use policies to meet Cornwall's economic, environmental and social needs and aims for the future, and provides the framework for all subsequent documents prepared which form part of the Local Plan.
- 1.6. The Strategic Policies sets a baseline housing figure of 2,900 dwellings in the Looe Liskeard Community Network Area between 2010 and 2030, of which 1,500 were to be delivered in the 18 parishes that make up the rural area of the Liskeard and Looe Community Network Area (CNA), including Looe. Cornwall Council have assisted Neighbourhood Plan groups by informing them of the 'share' of this baseline amount to be in conformity with the Local Plan. As at 1st April 2018, the baseline for Looe was for an additional 19 dwellings, in addition to the 185 dwellings completed since 2010, and existing commitments for a further 119.
- 1.7. The Local Plan also includes objectives covering each Community Network Area. For the Looe Liskeard CNA the objectives set are as follows:
 - Objective 1 - Economy and Jobs**
Deliver economic growth / employment, providing much needed jobs to counterbalance current and future housing development in and on the edge of Liskeard.
 - Objective 2 - Sustainable Development**
Improve connectivity within and on the edge of Liskeard to ensure the town functions effectively as a major hub and service centre for the network area; including enhanced public transport provision.
 - Objective 3 - Liskeard as a Service Centre**
Strengthen Liskeard's role as a service centre and improve town centre viability through regeneration schemes.
 - Objective 4 - Housing**
Balance the housing stock to provide a range of accommodation, particularly for open market family homes and intermediate affordable housing in Liskeard.
 - Objective 5 - Leisure Facilities**
Improve and maintain the provision of recreational, cultural and leisure services and facilities in Liskeard with particular focus on delivering sports pitches.
- 1.8. Although these objectives do not directly refer to the town, they obviously have implications for Looe.

WHAT IS STRATEGIC ENVIRONMENTAL ASSESSMENT?

- 1.9. The Looe Neighbourhood Development Plan has been judged by the Steering Group as requiring a Strategic Environmental Assessment (SEA) because the designated Neighbourhood Development Plan (NDP) area contains or is near to sensitive environmental assets that may be affected by it and it:
 - i. may allocate sites for development (for housing, employment etc.) that haven't already been appraised through the sustainability appraisal (SA) of the Cornwall Local Plan, and
 - ii. may include other policies and proposals that could be likely to have significant environmental effects not already addressed through the sustainability appraisal of the Cornwall Local Plan.
- 1.10. SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues.
- 1.11. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts. Through this approach, the SEA for the Looe

Neighbourhood Development Plan seeks to maximise the emerging plan’s contribution to sustainable development.

- 1.12. SEA is undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive². It also widens the scope of the assessment from focussing on environmental issues to further consider social and economic issues.
- 1.13. Two key procedural requirements of the SEA Regulations are that:
- i. When deciding on ‘the scope and level of detail of the information’ which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
 - ii. A report (the ‘Environmental Report’) is published for consultation alongside the Draft Plan (i.e the draft Looe Neighbourhood Development Plan) that presents outcomes from the environmental assessment (i.e. discusses ‘likely significant effects’ that would result from plan implementation) and reasonable alternatives. The report is then consulted on alongside the R16 consultation of the draft Looe Neighbourhood Development Plan.

PURPOSE AND STRUCTURE OF THIS SEA ENVIRONMENTAL REPORT

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

Figure 2: Questions that must be answered by the SEA Environmental Report in order to meet the regulatory³ requirements

Environmental Report question In line with the SEA Regulations, the report must include....⁴

<i>What is the plan seeking to achieve?</i>	<ul style="list-style-type: none"> • <i>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.</i>
<i>What is the sustainability ‘context’?</i>	<ul style="list-style-type: none"> • <i>The relevant environmental protection objectives established at international or national level.</i> • <i>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</i>
<i>What’s the scope of the SEA?</i>	<ul style="list-style-type: none"> • <i>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.</i>
<i>What is the sustainability ‘baseline’?</i>	<ul style="list-style-type: none"> • <i>The environmental characteristics of areas likely to be significantly affected.</i> • <i>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</i>
<i>What are the key issues & objectives?</i>	<ul style="list-style-type: none"> • <i>Key problems/issues and objectives that should be a focus of (i.e. provide a ‘framework’ for) assessment.</i>

² Directive 2001/42/EC

³ Environmental Assessment of Plans and Programmes Regulations 2004

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

What has plan-making/SEA involved up to this point?

What are the assessment findings at this stage?

What happens next?

- *Outline reasons for selecting the alternatives dealt with (and thus an explanation of the ‘reasonableness’ of the approach).*
 - *The likely significant effects associated with alternatives.*
 - *Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the submission version of the plan.*
 - *The likely significant effects associated with the submission version of the plan.*
 - *The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the submission version of the plan.*
-
- *The next steps for plan making / SEA process.*

2. LOCAL PLAN CONTEXT AND VISION FOR THE LOOE NEIGHBOURHOOD PLAN

LOCAL PLAN CONTEXT FOR THE NEIGHBOURHOOD PLAN

- 2.1 The Looe Neighbourhood Plan is being prepared in the context of the Cornwall Local Plan. Neighbourhood plans will form part of the development plan for Cornwall, alongside, but not as a replacement for the Local Plan. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Cornwall, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.
- 2.2 The overarching document for the Cornwall Local Plan, the Cornwall Local Plan: Strategic Policies 2010-2030⁵, was adopted in November 2016. This sets out the land use policies to meet Cornwall's economic, environmental and social needs and aims for the future, and provides the framework for all subsequent documents prepared which form part of the Local Plan.
- 2.3 Cornwall Council has prepared a Site Allocations Development Plan Document (DPD)⁶ to support the delivery of objectives within the Local Plan. The purpose of the Site Allocations DPD is to allocate land for a range of uses to meet the growth targets for the main towns in Cornwall, relating to housing growth, commercial growth and enabling infrastructure. In addition, the Site Allocations DPD identifies strategically important employment sites that should be safeguarded.
- 2.4 The Strategic Policies incorporates a housing target of 2,900 dwellings in the Liskeard and Looe Community Network Area (CNA) between 2010 and 2030, of which 1,400 are 'apportioned' to Liskeard, and 1,500 to the rest of the Community Network Area, although it is important to note that the CNA covers a significantly wider area than the Neighbourhood Plan area. The Site Allocations DPD confirms that no strategic sites have been allocated or safeguarded within the Neighbourhood Plan area.
- 2.5 Looe Town Council's Neighbourhood Plan Steering Group will therefore consider an appropriate number of housing and employment allocations to be delivered through the Neighbourhood Plan. This is further discussed in Section 4 and Section 5 below.

VISION, AIMS AND OBJECTIVES FOR THE NEIGHBOURHOOD PLAN

- 2.1 The vision statement for the Looe Neighbourhood Plan, which was developed during earlier stages of plan development, is as follows:

'By 2030, Looe will be a community that has revitalised its maritime and coastal based economy into one that brings prosperity to all and significantly reduces its impact on the environment, whilst maintaining its special character'

Vision Statement for the Looe Neighbourhood Plan

⁵ Cornwall Council (2016): 'Cornwall Local Plan Strategic Policies 2010-2030', [online] available to download via: <https://www.cornwall.gov.uk/localplancornwall>

⁶ Cornwall Council (2017): 'Cornwall Site Allocations Development Plan Document', [online] available to download via: <https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/development-plan-documents/cornwall-site-allocations-development-plan-document/>

2.2 To support the vision statement, the Neighbourhood Plan outlines 13 key objectives which aim to deliver the aspirations for the Looe NDP area. These are grouped under the following seven themes:

1. Tackling the Causes and Impacts of the Climate Emergency
2. Supporting Economic Development and Employment
3. Supporting Sustainable Tourism
4. Meeting Housing Needs
5. Conserving and Enhancing the Town Centre, Culture, Heritage, and Design
6. Supporting and Improving Community Facilities
7. Enhancing Connectivity

3. WHAT IS THE SCOPE OF THE SEA?

SEA SCOPING REPORT

- 3.1 The SEA Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England⁷. These authorities were consulted on the scope of the Looe Neighbourhood Plan SEA in December 2019.
- 3.2 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
 - Baseline data against which the Neighbourhood Plan can be assessed;
 - The key sustainability issues for the Neighbourhood Plan; and
 - An ‘SEA Framework’ of objectives against which the Neighbourhood Plan can be assessed.
- 3.3 Responses received on the Scoping Report, and how they were addressed, have been summarised below.

⁷ In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme

Figure 3.: Consultation responses received on the SEA Scoping Report

<i>Consultation response</i>	<i>How the response was considered and addressed</i>
<p>Natural England</p>	<p><i>Corine Dyke, Lead Advisor - Planning Policy (email response received on 9th January 2020)</i></p> <p><i>We welcome the SEA scoping report and we have no comments to make.</i></p> <p><i>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</i></p>
<p>Historic England</p>	<p><i>David Stuart, Historic Places Adviser (email response received on 14th January 2020)</i></p> <p><i>In our response to the Regulation 14 consultation on the Plan in the spring of last year we drew attention to the need for heritage evidence associated with proposals to allocate sites for development and recommended that relevant exercises should draw upon guidance which we identified. We are pleased to see that this guidance has been referred to in the Report.</i></p> <p><i>We are also pleased to note generally the comprehensiveness of the Historic Environment section in its identification of relevant issues and how these should inform the SEA agenda. On this basis we anticipate looking forward to subsequent consultations which will allow us to applaud the scope and quality of the heritage evidence base and endorse its ability to substantiate the Plan’s contents in accordance with national and local policy for the protection and enhancement of the historic environment</i></p>
<p>Environment Agency</p>	<p><i>Harriet Fuller, Planning Advisor, Sustainable Places received on 11th December 2019</i></p> <p><i>Comments noted.</i></p> <p><i>The development proposed in the Looe NDP does not allocate or encourage development over that envisioned in the Local Plan.</i></p>
<p><i>In general we consider that it is unlikely that neighbourhood plans will result in any significant environmental effects unless the plan allocates or encourages development over that set out in the Local Plan. Otherwise we consider that any potential for environmental effects from growth in the parish should already have been addressed through the Sustainability Appraisal (SA) which supported the adopted Local Plan.</i></p>	

3.4 Baseline information (including the context review and baseline data) is presented in Appendix A. The key sustainability issues and SEA Framework are presented below.

KEY SUSTAINABILITY ISSUES

Climate Change (Including Drainage and Flood Risk)

- Any increases in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions in the NDP area.
- The total CO₂ emissions per capita within Cornwall are broadly similar to the regional and national totals and the overall percentage reduction of emissions within the Neighbourhood Plan area between 2005 and 2016 was slightly less than regional and national totals.
- The raised risk of fluvial, tidal and surface water run-off contributed to by global warming, and its effect on flooding, land instability, coastal erosion and bathing water quality poses a serious threat to community safety, the fabric and form of the town, and its future prosperity.
- The Looe Neighbourhood Plan should seek to increase the resilience of the Neighbourhood Plan area to the effects of climate change by supporting and encouraging adaptation strategies.

Biodiversity and Geodiversity

- The Whitsand and Looe Bay Marine Conservation Zone is located partly within and adjacent to the Neighbourhood Plan area, with the integrity of the site threatened by coastal recreation, public rights of way (including the South West Coast Path), tourism, economic regeneration, flood protection, land drainage and planning and development.
- There are some nationally protected sites close to the Neighbourhood Plan area. These include Polyne Quarry SSSI and Talland Barton Farm SSSI. Their Impact Risk Zones indicate that depending on scale, residential, rural residential and rural non-residential developments could have an impact.
- At the local level, Kilminorth Local Nature Reserve (LNR) and six County Wildlife Sites (CWS) are also located within or overlap with the Neighbourhood Plan area, containing a variety of Biodiversity Action Plan (BAP) Priority Habitats.
- Several other extensive areas of BAP Priority Habitat are located within or overlapping with the Neighbourhood Plan area, predominantly areas of deciduous woodland.

Landscape

- The western most quarter of the Neighbourhood Plan area is located within the boundary of the Cornwall Area of Outstanding Natural Beauty (AONB). This area has an open coastal landscape incised by the short coastal stream dropping from Portlooe to Port Nadler Bay. It is mainly agricultural but features a small hamlet (Portlooe) and Ten Creek Holiday Park.
- The remainder is an Area of Great Landscape Value (AGLV).
- There are two Landscape Character Areas (LCA) and thirteen Landscape Capacity Parcels (LCP) which define the character of the Neighbourhood Plan area in terms of topography and drainage, land cover and land use, field and woodland pattern, building distribution, transport pattern and historic features, aesthetic and sensory features.

- The views across and along the two river valleys, the townscape looking up the valley sides from the river and town, and long distance views along the coast and inland are an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process.

Historic Environment

- The Neighbourhood Plan area hosts an extensive variety of heritage assets which reflect the town's long history as a busy seaport and fishing community.
- Many of these are nationally and locally designated heritage assets. There is 1 Grade I listed building, 8 Grade II* listed buildings, and 113 Grade II listed buildings, and 1 scheduled monument. Looe Conservation Area covers most of the town.
- Following a basic review of the Historic Environment Record (HER) for Cornwall, there are 161 records within Looe NDP area including a variety of structures and archaeological finds with a mining legacy, medieval and post-medieval features, and finds dating back to the Bronze Age, Neolithic and Roman eras.
- The 2002 Cornwall Industrial Settlements Initiative Report and the subsequent Conservation Area Appraisal 2009 provide an in-depth understanding of the special interest of the area, and the challenges it faces. It is clear from these that harm to the town's substantial and important historic environment is continuing and that action to control the impact of change is essential.

Land, Soil and Water Resources

- Although the ecological and chemical quality of the Looe River was identified as 'Good' in 2016, bathing water quality at East Looe Beach was last recorded (2019) as being only 'sufficient'. Continued climate change-led increases in rainfall intensity and amount pose a threat to this position.
- There is a lack of evidence to ascertain agricultural land quality within the Neighbourhood Plan area, national provisional quality datasets indicating some Grade 2 with mostly Grade 3 and 4 land, and as part of a precautionary approach it is noted that there is the potential for loss of high quality (Grade 2 and Grade 3a 'best and most versatile') agricultural land.

Population and Community

- From 2002 to 2017 whilst the Looe NDP area population grew by 2.8%, the proportion of that population of working age fell by -6.5% and the number of young people (aged 15 to 34) fell by -8.5%, but the proportion over retirement age grew by 15.1%. In 2017 people of 65 plus represented 31.8% of the population, compared to 26.9% in 2001. This trend is likely to continue and increase, with 57.6% of the population already being 50 years old or more.

Health and Wellbeing

- Health and wellbeing levels within the Neighbourhood Plan area are generally lower than regional and national averages with a lower percentage of residents reporting 'good' or 'very good' health.
- A growing and ageing population within the Neighbourhood Plan area may increase the reported cases of disability, further reduce the levels of good health, and place future pressures on health services in the wider area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing.

- Obesity is also seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

Transportation

- 75.8% of households in the Neighbourhood Plan area have access to at least one car or van, which is significantly less than the percentages for Cornwall (82.7%), the South West of England (81.1%) and England (74.2%).
- The percentage of households in the Neighbourhood Plan area with access to at least two cars or vans (28.6%) was much less than the total for Cornwall (38.0%), the South West of England (37.6%) and England (32.0%).
- the most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van (55.0%) which is less than Cornwall (64.5%), the South West of England (62.3%), and England (57.0%).
- A lower percentage of residents in the Neighbourhood Plan catch a train, bus, minibus or coach to work in comparison to the regional and national trends, and a higher proportion of employed residents walk to work (25.5%) compared to Cornwall (14%), the South West of England (13.6%), and England (10.7%).
- A higher proportion work mainly at or from home as well.
- There are good public transport links to locations outside of Looe but within Looe the links are less good

SEA FRAMEWORK

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

Figure 4: SEA Framework Objectives

SEA Objective	Assessment questions
Climate Change	
Reduce the contribution to climate change made by activities within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the number of journeys made? • Reduce the need to travel? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
Support the resilience of the Neighbourhood Plan area to the potential effects of climate	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Ensure that inappropriate development does not take place in areas at higher risk of flooding, ground instability and coastal erosion taking into account the likely future effects of climate change? • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?

<p>change, including flooding</p>	<ul style="list-style-type: none"> • Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)? • Ensure the potential risks for Looe associated with climate change (rising sea level, cliff and hill instability, pollution and contamination) are considered through new development in the Neighbourhood Plan area? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?
<p>Biodiversity and Geodiversity</p>	
<p>Protect and enhance all biodiversity and geodiversity</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the integrity of the Looe Marine Conservation Zone? • Support the status of the nationally and locally designated sites within and/or adjacent to the Neighbourhood Plan area? • Protect and enhance priority habitats and species? • Achieve a net gain in biodiversity? • Protect and support enhancements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
<p>Landscape</p>	
<p>Protect and enhance the character and quality of landscapes and townscape.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance the natural beauty and special qualities of the Cornwall AONB, in line with its Management Plan? • Conserve and enhance locally important landscape and townscape features within the Neighbourhood Plan area as defined by the two LCAs and thirteen LCTs? • Conserve and enhance local diversity and character? • Protect locally important viewpoints contributing to the sense of place and visual amenity of the Neighbourhood Plan area?
<p>Historic Environment</p>	
<p>Protect, conserve and enhance heritage assets within the Neighbourhood Plan area</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Conserve and enhance the special interest, character and appearance of locally important features and their settings? • Support the integrity of the historic setting of key buildings of cultural heritage interest as listed on the Cornwall HER? • Support access to, interpretation and understanding of the historic evolution and character of the environment? • Conserve and enhance archaeological remains, including historic landscapes?

	<ul style="list-style-type: none"> • Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies?
Land, Soil and Water Resources	
Ensure the efficient and effective use of land	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote the use of previously developed land? • Avoid the development of the best and most versatile agricultural land, which in the Looe NDP area may comprise Grade 2 to 3a agricultural land?
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the amount of waste produced? • Support the minimisation, reuse and recycling of waste? • Encourage recycling of materials and minimise consumption of resources during construction?
Use and manage water resources in a sustainable manner.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support improvements to water quality? • Minimise water consumption? • Protect surface water resources?
Population and Community	
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high quality community services and facilities.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Minimise fuel poverty? • Maintain or enhance the quality of life of existing local residents? • Improve the availability and accessibility of key local facilities, including specialist accommodation and services for disabled and older people?
Reduce deprivation and promote a more inclusive and self-contained community.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the amount of waste produced? • Support the minimisation, reuse and recycling of waste? • Encourage recycling of materials and minimise consumption of resources during construction?
Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the provision of a range of house types, tenures and sizes? • Support enhancements to the current housing stock? • Meet the needs of all sectors of the community? • Provide quality and flexible homes that meet people's needs?

dwelling sizes, types and tenures.	<ul style="list-style-type: none"> Promote the use of sustainable building techniques, including use of sustainable building materials in construction? Provide housing in sustainable locations that allow easy access to a range of local services and facilities
Health and Wellbeing	
Improve the health and wellbeing of residents within the Neighbourhood Plan area.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> Promote accessibility to a range of leisure, health and community facilities, for all age groups? Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards? Promote the use of healthier modes of travel? Improve access to the countryside for recreational use? Improve the range of accessible facilities available for healthy exercise?
Transportation	
Promote sustainable transport use and reduce the need to travel.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> Encourage modal shift to more sustainable forms of travel? Reduce congestion and problems with traffic sensitivity Facilitate working from home and remote working? Improve road safety? Reduce the impact on residents from the road network?

4. WHAT HAS PLAN MAKING / SEA INVOLVED UP TO THIS POINT?

INTRODUCTION

- 4.1 The ‘narrative’ of plan-making / SEA up to this point is told within this part of the Environmental Report.
- 4.2 A key element of the SEA process is the appraisal of ‘reasonable alternatives’ for the Looe Neighbourhood Plan. The SEA Regulations⁸ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the ‘plan and reasonable alternatives taking into account the objectives and geographical scope of the plan’.
- 4.3 In accordance with the SEA Regulations the Environmental Report must include...
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.4 The following sections therefore describe firstly how the SEA process to date has informed the preferred development strategy for the Neighbourhood Plan area and potential locations for development, and secondly how the Looe Neighbourhood Development Plan policies performed against the SEA Framework.
- 4.5 Specifically, this chapter explains how the Looe Neighbourhood Plan’s development strategy has been shaped through considering:
- One. Alternative approaches for the broad location of housing in the Neighbourhood Plan area.**
- Two. Assessment of options for a site to be include within the Development Limit.**

OVERVIEW OF PLAN MAKING / SEA WORK UNDERTAKEN SINCE 2014

- 4.6 Following the designation of the Looe Neighbourhood Plan area, initial scoping work with the community was carried out in 2015 which aimed to identify the key areas which residents felt were the most pressing issues for the Town. These were: to balance development needs and protection of the natural and historic environment, tackling flooding and coastal marine management, meeting the challenges of climate change, provision for an outer harbour, waste management, education, roads, parking and traffic, youth facilities, disability access.
- 4.7 The ‘Springtime of Community Engagement’ 2016, involved detailed community consultation to collect further information which could be used to shape the development of the Neighbourhood Plan. Consultation methods included:
- detailed questionnaires which were distributed to every household and business in Looe, a youth survey, and via tourism accommodation and venues to visitors, leading to 498 responses from residents, 118 responses to youth survey, 71 responses to the business survey and 309 responses to the visitor survey. For the household survey, there were 495 returns from 2,450 households, a return of 20.2%.
 - ‘Drop-in Road shows’ which were held at the Looe Festival of the Sea and the Looe May Fayre and the Millpool Centre in June 2016.

⁸ Environmental Assessment of Plans and Programmes Regulations 2004
Strategic Environmental Assessment for the
Looe Neighbourhood Plan

- Letters were also sent to local organisations, infrastructure providers, and groups representative of people within ‘Protected Characteristics’ under the terms of the Equalities Act.
- A website was also created to explain the Plan and to enable residents to follow the progress to date.
- The Steering Group established pages on various social media platforms to advertise the Plan and for residents to provide their comments and thoughts on the process.

- 4.8 The response to the ‘Springtime of Community Engagement’ was that people would like Looe to be described in the future as a working harbour, a leisure harbour, a traditional town and a tourism destination. People saw the most important benefits that the Plan could bring were to tackle issues such as flooding & landslip, protect Looe’s local identity and its local green spaces, encourage community and business recycling and bring greater investment in improving the road and transport infrastructure. People wanted to see the ‘offer’ of the town centre improved for both residents and visitors. A majority of people thought the site at Polean should be re-developed to provide leisure and shopping facilities. For the harbourside most people believe the Plan should help to support and retain the fishing fleet and support more marine and leisure activities. Just over half of youth survey respondents stated that they desired to continue into further or higher education, whilst career aspirations focussed on sport and leisure, engineering, entertainment and healthcare. Affordable housing was the main type of housing desired.
- 4.9 Businesses said they looked for improved access, a bigger site so they can expand, or to improve their existing site. In order to encourage business growth, faster and better-quality internet was the top consideration along with better toilet provision and improved parking. There was overwhelming support for regular events in the town that improve footfall and business opportunities.
- 4.10 Visitors said that what they liked most about Looe was the fact that Looe is a seaside location, it’s harbour/boats, the beach and the ‘change of pace’ these represented.
- 4.11 Subsequently the Steering Group held a Visioning Event, to which a wide range of local people and organisations were invited. After reviewing the evidence available and the consultation response, the meeting concluded that the dependency of the settlement of Looe on the sea and the Looe River is absolutely fundamental as it owes its founding to the sea and river and continues to draw its economic, social and environmental well-being from them. The principal asset of the town was seen to be its distinctiveness as a classic Cornish coastal settlement located in a fine natural and historic landscape, with a fishing harbour, pier, beach, railway branch-line, and quaint narrow streets. However, it was also seen that climate change is a major challenge to the future prosperity of the Town, bringing with it rising sea-levels and aggressive storms, frequent serious flooding within the harbour and town centre, extending coastal erosion and land instability nearby, and combined with many years of poor waste-water management in the wider river catchment, risking bathing water quality.
- 4.12 The meeting agreed that the Neighbourhood Plan should aim to:
- support projects that are helping to resolve the problems caused by climate change,
 - ensure that new development is environmentally sustainable and contributes to resolving the causes of climate change,
 - take advantage of the opportunities arising from the improvements that will be delivered, and
 - protect and enhance the heritage assets, townscape and landscape that make Looe distinctive.
- 4.13 Working Groups were set up to devise strategies and policies to deliver these aims covering the themes of:

- Access to Services and Shopping
- Economy
- Heritage, Culture and Tourism
- Housing and Environment

⁷ Environmental Assessment of Plans and Programmes Regulations 2004

4.14 Additionally, the Steering Group has carried out and commissioned further survey work to contribute to the evidence base for the Neighbourhood Plan. Key documents include:

- Local Landscape Character Assessment (2016/17);
- Heritage and Character Assessment (2017);
- Housing Needs Survey (2017);
- An Urban Edge Assessment (2018 to 2020);
- Tourism Market Analysis (2020);
- Polean/Millpool Master Plan (2020);
- Heritage Impact Assessment (2020).

ASSESSMENT OF REASONABLE ALTERNATIVES

One. Assessment of options: The broad location of development.

4.15 The Cornwall Local Plan states that the housing baseline allocation for the Liskeard and Looe Community Network Area (CNA) is for 2,900 dwellings in the period between 2010 and 2030, of which 1,400 are ‘apportioned’ to Liskeard, and 1,500 to the ‘rest of’ the Community Network Area. The Neighbourhood Plan notes that in the ‘rest of’ the Community Network Area 1541 dwellings had been completed or were commitments by April 2020, of which Looe has contributed 271 completed dwellings and a further 22 dwellings had received planning permission.

4.16 Therefore, Cornwall Council have advised that no further dwellings need to be allocated in Looe to meet the CNA baseline target. However, there is an ongoing need for affordable housing and some market housing demand which arises locally. This highlighted in the table below.

Figure 5: Summary of the housing completions and permissions in the Liskeard and Looe CNA (taken from the Neighbourhood Plan)

Liskeard & Looe CNA Rural Area Housing Apportionment:	1500
CNA Completions and commitments to 4/2020 :	1541
Remaining up to 2030:	0
Looe share (27%) This is the pro-rata proportion of houses in the CNA, derived from the 2011 Census, adjusted to take into account the AONB (i.e. areas deemed inappropriate for large scale development).	0
Completions in Looe 2010 to 2020:	271
Commitments in Looe 2019 (10% deducted for non-implementation)	22
NDP Housing Needs Survey Affordable Requirement:	40
Homechoice Housing Needs at June 2018:	45
Number of affordable houses permitted to date:	81

- 4.17 Recognising that the overall level of housing growth to be delivered within the Neighbourhood Plan area to be compliant with the Local Plan has already been met through recent completions and permissions approved through the development management process, the Neighbourhood Plan Steering Group have proactively sought to engage the local community on the question as to what extent the Neighbourhood Plan should seek to deliver additional housing through the Neighbourhood Plan. Following the undertaking of a range of consultation events throughout the development of the Neighbourhood Plan, it was determined that there was a strong desire for the unique character of the Town to be conserved and little appetite amongst the community for the Neighbourhood Plan to deliver significant additional levels of housing in the Neighbourhood Plan area above the Local Plan Apportionment.
- 4.18 However, the Steering Group were conscious that there may be valid reasons why some additional housing development beyond the Liskeard & Looe CNA Rural Area Housing Apportionment may be justified. These are identified in Figure 6 following:

Figure 6: Summary of the factors that might lead to a decision to plan to exceed the Liskeard & Looe CNA Rural Area Housing Apportionment.

Issue	Analysis
Results from NDP Housing Needs Survey and HomeChoice register	The NDP survey identified 40 required affordable housing, and HomeChoice indicated a need for 45. Local affordable housing need is volatile and may change rapidly. Provision to meet affordable housing needs should continue.
Housing market information.	<p>The completed/committed number of dwellings as of 2020 is sufficient to meet market requirements identified in the Cornwall Local Plan (CLP) to 2030 in its Liskeard & Looe CNA Rural Area Housing Apportionment. However local market demand will continue. The NDP Housing Survey identified a market requirement for 9 dwellings going forward.</p> <p>Market housing is subject to Cornwall Local Plan Policy 8 so could include around 30% affordable to rent/buy to help address the need for housing in this format.</p>
Would additional houses (and population) help sustain local services and facilities?	Whilst even a few additional homes, which are occupied by new residents (rather than existing) will help support existing local services by generating more custom/demand within their 'walk-in' catchment. In order to support the introduction of additional local services, a substantial 'critical mass' of new development would be required to provide the custom/demand necessary to support new facilities and could lead to un-necessarily large developments in sensitive areas.
Would developer investment have benefits in terms of other infrastructure provision?	New development should directly fund infrastructure provision needed to allow a development to proceed. However, funding infrastructure provision that does not arise directly from a development is inadvisable and could lead to un-necessarily large developments in sensitive areas.

Housing for older people	Looe’s population mix is getting much older. The housing market is delivering much less specialist housing for older people than is needed with the result that many people need to move to suitable accommodation or care-homes away from their own neighbourhoods, families and friends. Therefore, some provision for specialist affordable housing for the elderly is advisable.
Proliferation of 2nd Homes.	The external market pressure that 2 nd homes demand brings drives up local house prices in the owner-occupier and private rented sectors, creating a situation where local people can no longer afford to live locally.

- 4.19 In light of the issue analysis in Paras 4.15 to 4.18 and Figure 6 preceding, the Neighbourhood Plan does not seek to provide a significantly higher level of development than is planned for in the Local Plan housing apportionments. As such, it would not be appropriate for the SEA process to consider different levels of growth.
- 4.20 However, in light of the analysis the Neighbourhood Plan does recognise that there is a need to plan to allow some flexibility to support locally arising market demand, facilitate Local Plan Policy 9 on exceptions sites, and address the needs of older people. It is appropriate for the SEA process to consider different options to achieve this level of development, whilst continuing to respect and enhance the special setting and characteristics of Looe.
- 4.21 In terms of employment land, the Cornwall Local Plan makes no requirements on the Looe Neighbourhood Development Area. However, the Steering Group considered that provision should be made for small scale workshop/office/research facilities which assist the growth of value-added enterprise arising as a result of the Harbour improvements, and/or provide opportunities for start-up enterprises, and grow on space for previously home-based enterprises, and/or wish to cluster with similar enterprises.
- 4.22 To support decision-making on these elements, the SEA process undertook an appraisal of two different and alternative approaches. These were as follows:
- Option A: Restrict development to within a development boundary which includes specific site allocations and facilitates ‘exception’ sites.
 - Option B: Take a less restrictive approach to development which allows market forces to promote new sites.
- 4.23 Figure 7 presents the findings of the appraisal of Option A and Option B outlined above. To support the assessment findings, the options have been ranked in terms of their sustainability performance against the relevant theme. It is anticipated that this will provide the reader with a likely indication of the comparative sustainability performance of the two options in relation to each theme considered.
- 4.24 As a subset of Option A, consideration must be given to an assessment of reasonable alternative allocation sites for inclusion within the proposed development boundary. This is given in the following section ‘Two. Assessment of options: Sites to be included within the Development Limit’.
- 4.25 Figure 10 presents a summary of the appraisal of alternate sites for inclusion within the development boundary, Figure 11 presents a more detailed appraisal of the shortlisted alternate sites for development.

Figure 7: Appraisal findings: options for the broad location of development

<p>Option A: Restrict development to within a development boundary which includes specific site allocations and facilitates ‘exception’ sites.</p> <p>Option B: Take a less restrictive approach to development which allows market forces to promote new sites.</p>			
SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt A	Opt B
<p>Climate Change (Including Drainage and Flood Risk)</p>	<p>In terms of greenhouse gas emissions, road transport is the significant contributor to emissions in the area. The extent to which the two options have the potential to support climate change mitigation through facilitating a reduced level of car dependency is therefore a key element. Option A has some potential to limit the need to travel to access local services and facilities. This also has the potential to encourage the use of non-motorised transport modes such as walking and cycling for these purposes, although this is limited by the difficult topography of Looe which encourages car use. This may do more than Option B (which will facilitate a more dispersed approach to development) for limiting greenhouse gas emissions from transport.</p> <p>In terms of other types of emissions from new development areas, this depends on the design, materials use and energy efficiency of new buildings, which is controlled by policies that are generally applicable.</p> <p>In relation to flood risk, option A will better be able to ensure that development does not take place in areas at higher risk of flooding, ground instability and coastal erosion taking into account the likely future effects of climate change as such areas are not likely to be included within a development boundary. However, with regard to ‘exception sites’ it is not possible to differentiate between the options given that this depends on the location of development and the general policies of the Looe NDP, Cornwall Local Plan and NPPF on measures to tackle the issue, for example through incorporation of mitigation measures such as sustainable urban drainage systems (SuDS).</p> <p>In terms of the wider elements relating to climate change adaptation, it is not possible to differentiate between the options given that this also depends on the provision of appropriate infrastructure alongside new development areas, such as green infrastructure provision and appropriate design and layout, as guided by Looe NDP, Cornwall Local Plan and NPPF.</p>	<p>1</p>	<p>2</p>

Option A: Restrict development to within a development boundary which includes specific site allocations and facilitates 'exception' sites.

Option B: Take a less restrictive approach to development which allows market forces to promote new sites.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt A	Opt B
Biodiversity and Geodiversity	The significance of effects depends on the design and layout of new development and the integration of infrastructure which supports ecological networks in the area. As such, if all development seeks to integrate these elements, then there should be no difference between the options in terms of impacts on habitats, species and ecological networks. The significance of the effects from each option on features and areas of biodiversity interest therefore largely depends on the detailed location, scale and nature of development and the incorporation of biodiversity enhancement measures.	=	=
Landscape	Through restricting development to locations within a thoughtfully drawn development boundary based on the Looe Landscape Character Assessment and the Heritage Impact Assessment, Option A has the potential to do more than Option B to limit impacts from new development on the natural and historic landscape character. This will support local character, promote settlement distinctiveness, protect the much cherished views enjoyed in the Plan area, and contribute to the 'sense of place'. Option A however, has increased potential to impact on townscape character locally by promoting infill/Previously Developed Land (PDL) development, although general criteria based policy in the Looe NDP and Cornwall Local Plan will help to limit such an effect.	1	2
Historic Environment	Through restricting development to locations within a thoughtfully drawn development boundary based on the Looe Landscape Character Assessment and the Heritage Impact Assessment, Option A has the potential to do more than Option B to limit impacts from new development on heritage assets and the historic landscape character. Also, the inclusion of an allocated site within the Development Boundary is subject to caveats that any development should demonstrably respond to the historic environment in their design, including agreed mitigations and enhancements. Infill development facilitated through Option A however has the potential to impact on the fabric and setting of historic environment assets within the existing settlement area, It should be noted though that small-scale development will be constrained by heritage policies in the National Planning Policy Framework (NPPF), Cornwall Local Plan and the Looe NDP so it does not necessarily need to be harmful to the fabric and setting of the historic environment. A high quality and sensitive development has the potential to rejuvenate features and areas of historic environment interest and sensitivity. In this respect both options have the opportunity to enhance the historic environment through respecting existing historic features and promoting local distinctiveness.	1	2

Option A: Restrict development to within a development boundary which includes specific site allocations and facilitates 'exception' sites.

Option B: Take a less restrictive approach to development which allows market forces to promote new sites.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt A	Opt B
Land, Soil and Water Resources	<p>Option A, has increased potential to support the redevelopment of previously developed land. This may help support the remediation of contaminated land.</p> <p>Option B, through facilitating development in open countryside, is likely to encourage development on productive agricultural land.</p> <p>Waste management issues are likely to apply to both Options equally.</p> <p>In terms of water quality, it is difficult to reach a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the particular design measures that will be put in place such as sustainable drainage systems (SuDS) in accordance with Looe NDP, Cornwall Local Plan and NPPF requirements. However, the allocation of a site and infill/PDL development within the Development Boundary is more likely to benefit from the availability of connections with existing drainage and water supply networks.</p>	1	2
Population and Community	<p>New development facilitated through Option A is more likely to be well integrated with the existing settlement. Therefore, the option may do more to support the vitality of existing communities, support accessibility to local services and facilities, and bolster the vitality of the town centre.. Option A's integration of development with the existing development may also enable new residents to better join in with the surrounding community, promoting cohesion. However, given the relatively limited opportunities for infill and PDL development in the settlement area, Option B has the potential to support larger scale and more appropriate development which can deliver a range of housing types and tenures, and potentially, community facilities and walking / cycling links, although as noted above these may be less well-related to the existing community.</p>	=	=
Health and Wellbeing	<p>Given the relatively limited opportunities for infill/PDL development in the Neighbourhood Plan area, Option B has the potential to support larger scale development which can deliver a range of housing types and tenures, and potentially, community facilities and walking / cycling links.</p> <p>On the other hand well-located and well-designed development within the Development Boundary under Option A may be likely to support the development of housing at locations which are more easily accessible to existing services, facilities and amenities, including health and leisure facilities and do more to support the health and wellbeing of local people than more dispersed development under Option B.</p>	=	=

Option A: Restrict development to within a development boundary which includes specific site allocations and facilitates 'exception' sites.

Option B: Take a less restrictive approach to development which allows market forces to promote new sites.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt A	Opt B
Transportation	<p>Option A will help direct new development to areas with better quality roads and footpaths. Given these locations have the widest range of public transport links, including bus services, and rail services, the option will do more than Option B to support accessibility to public transport networks.</p> <p>Option A is also likely to direct development to locations with a broader range of services and facilities This will help reduce the need to travel for day-to-day amenities.</p>	1	2

- 4.26 The appraisal concludes that the preferred approach should be 'Option A: Restrict development to within a development boundary which includes specific site allocations and facilitates 'exception' sites'.
- 4.27 It was agreed by the Steering group that the advantages of a development boundary outweighed the disadvantages. In particular, that they help to ensure that development is directed to more sustainable locations and that they ensure a coordinated and consistent approach to the consideration of planning applications

Two. Assessment of options: Sites to be included within the Development Boundary

- 4.28 To support decision-making when drawing up the Development Boundary and assessing where any additional sites for inclusion within the Boundary should best be located, the SEA process undertook an appraisal of 14 candidate land 'cells' around the town. These were examined in an iterative process through a Local Landscape Character Assessment (Appendix 2) and an Urban Edge Assessment (Appendix 3) to identify and exclude any cells which are unsuitable for development on any scale due to critical landscape, flooding, and biodiversity concerns. This eliminated 7 'cells' as being unsuitable, leaving an initial shortlist of 7 cells with some potential for further investigation.
- 4.29 These cells were then 'sieved' through a Heritage Assessment (Appendix) and then further examined using 19 more detailed criteria drawn from the Sustainability Appraisal of the Cornwall Local Plan, to identify a limited number of 'site opportunities' within the most appropriate cells. (see Appendix 5) These site opportunities were then subjected to a SWOT (Strengths/Weaknesses/Opportunities/Threats) analysis (Appendix 6) which led to the identification of a final shortlist of three sites considered to have the most potential for sustainable allocation for housing purposes, one for employment, and one for employment plus other uses. The shortlist was discussed by the Steering Group and two sites for housing and two for employment/other uses were proposed in the Pre-Submission Consultation Draft Neighbourhood Development Plan.
- 4.30 After the Regulation 14 consultation period the site assessments were further revised adding detail to the Heritage Assessment in particular, and two of these sites were removed from the Neighbourhood Development Plan for its Submission Draft version.
- 4.31 A final SEA appraisal summarising and bringing together these assessments is given in Figure 10 below.

4.32 Three sites within the built-up area that came forward separately were also examined, these being Polvellan House, The East Looe Fire Station Site, and The West Looe Police Station Site. These are assessed in the following section 5.

Figure 8: Landscape Capacity Summary Map

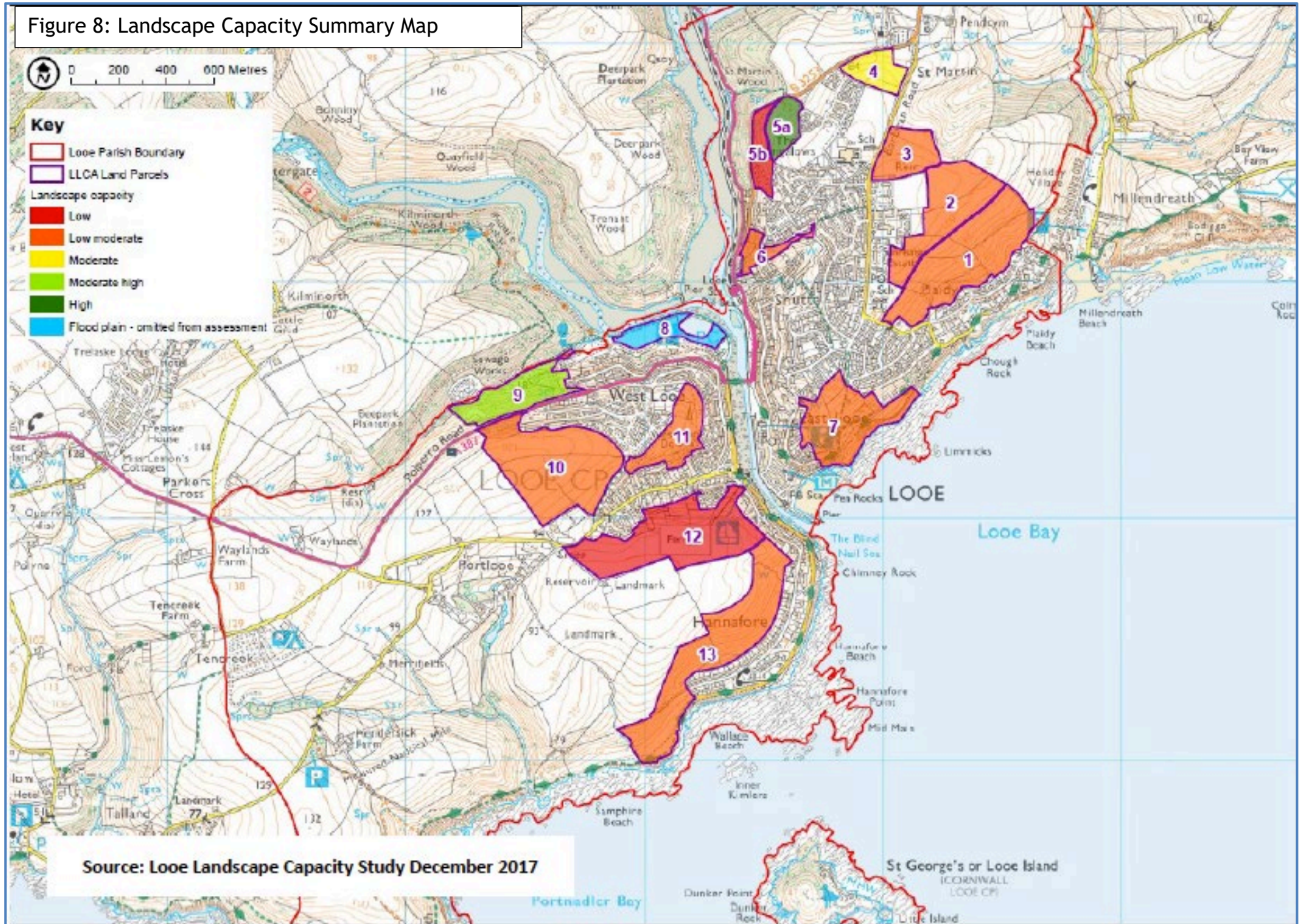




Figure 9: Urban Edge Assessment Shortlist

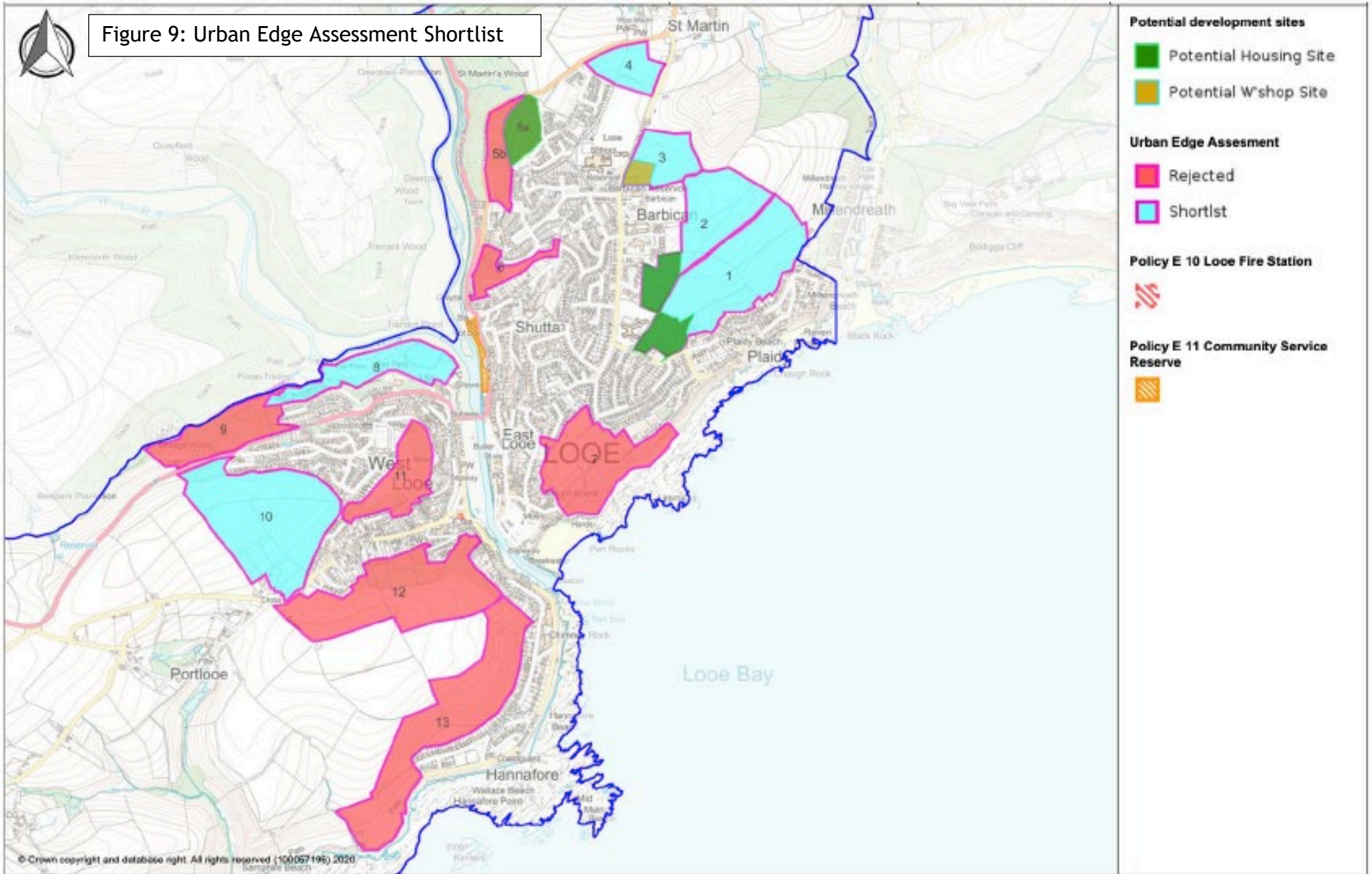


Figure 10: Summary of shortlisting assessment of land cells and candidate allocation sites.

Cell Reference	Assessment Considerations	Shortlisted?
1. Land to North of Plaidy Park Road, Barbican. Proposed Use: Residential		
	<p>Climate Change: Mostly located within walking distance of local ‘top up’ shops Senior and Primary Schools and playing field (although topography may be a limitation to older residents). On infrequent bus route. Is considerable distance from town centre facilities so potential to increase use of sustainable transport marginal. Dual aspect/ varying gradient allows some degree of solar gain and use of renewable energy technologies. Entire cell is outside of Flood Zone 3a or 3b. Topography could impede sustainable design and drainage. Development of this cell would have neutral effect on this SEA objective.</p> <p>Biodiversity: Is in Plymouth Sounds and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA) ‘Zone of Influence’ Small scale development here is not considered to have a likely significant effect on the European sites by virtue of the mitigation of recreational impacts from new development provided through Cornwall Local Plan policy 22. The cell not covered by, adjacent or in proximity to a Cornwall wildlife Site, or Ancient Woodland but is adjacent to BAP habitat. Drainage controls could protect/enhance biodiversity and lead to net gains that would help offset any losses on site. Development of this cell would have neutral effect on this SEA objective.</p> <p>Landscape: This land parcel has a Low Moderate capacity to accept housing development due to the quality of the rural Grade 2 arable farmland within the AGLV and its field pattern with mature trees within the boundary hedges which are a key characteristic of the rural farmland landscape. The cell is not in proximity to a designated AONB. Development of all of this cell would have negative effect on this SEA objective.</p> <p>Historic environment: In an area of anciently enclosed land with high archaeological potential and substantial range of heritage assets nearby. Part of the broader historic landscape setting of the complex of heritage assets present in the town, that helps understanding of how Looe’s advantageous sea level position, at the mouth of a river, between the higher rolling plateau of manorial land above was the cause for its founding as a pair of ‘planted’ towns. Development here would add to urbanization seriously undermining this setting. It is concluded that development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Land, Soil and Water Resources: A greenfield site, mostly of Grade 2 quality, but close to existing drainage and water supply services. Topography in parts could impede sustainable drainage. Development of all of this cell would have negative effect on this SEA objective.</p> <p>Population and Community: Site is located alongside existing housing and a school and at the extent of a reasonable walking distance of ‘top up’ shopping, and could provide missing community facilities (eg playspace) and help extend the range of housing available, However it is not in reasonable walking distance of most other facilities. Development of this cell would have positive effect on this SEA objective.</p>	<p>INITIAL SHORTLIST: YES FINAL SHORTLIST: NO</p>

	<p>Health and Wellbeing: Although development here could provide a Playspace to meet missing local provision, access to leisure, health and community facilities or to green infrastructure/recreation is not likely to be improved. Healthier modes of travel are unlikely to be encouraged. Development of this cell would have neutral effect on this SEA objective.</p> <p>Transportation: Much of site within walking distance of local facilities although topography may be a limitation to older residents. Mostly located within walking distance of bus stops providing services to Looe Town Centre and Plymouth, and additional population may encourage increased frequency. However existing traffic sensitivity may be aggravated by use of private vehicles. Development of this cell would have neutral effect on this SEA objective.</p>	
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2. Land to East of Bay Down, Barbican.

Proposed Use: Residential

	<p>Climate Change: Located within walking distance of local ‘top up’ shops, Pub, Senior and Primary Schools and playing field. On infrequent bus route. Is considerable distance from town centre facilities so potential to increase use of sustainable transport marginal. Dual aspect/ varying gradient allows some degree of solar gain and use of renewable energy technologies. Entire cell is outside of Flood Zone 3a or 3b. Topography unlikely to impede sustainable design and drainage. Development of this cell would have positive effect on this SEA objective.</p> <p>Biodiversity: Is in Plymouth Sounds and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA) ‘Zone of Influence’ Small scale development here is not considered to have a likely significant effect on the European sites by virtue of the mitigation of recreational impacts from new development provided through Cornwall Local Plan policy 22. The cell not covered by, adjacent or in proximity to a Cornwall wildlife Site, or Ancient Woodland but is partially covered and adjacent to BAP habitat. Drainage controls could protect/enhance biodiversity and lead to net gains that would help offset any losses on site. Development of this cell would have neutral effect on this SEA objective.</p> <p>Landscape: This land parcel has a Low Moderate capacity to accept housing development due to its elevated position on an open ridge within a rural AGLV farmland landscape of scenic quality. The cell is not in proximity to a designated AONB Development of all of this cell would have negative effect on this SEA objective.</p> <p>Historic environment: In an area of anciently enclosed land with high archaeological potential and substantial range of heritage assets nearby. Part of the broader historic landscape setting of the complex of heritage assets present in the town, that helps understanding of how Looe’s advantageous sea level position, at the mouth of a river, between the higher rolling plateau of manorial land above was the cause for its founding as a pair of ‘planted’ towns. Development here would add to urbanization seriously undermining this setting. It is concluded that development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Land, Soil and Water Resources: A greenfield site, all of Grade 2 quality, but close to existing drainage and water supply services. Several properties nearby rely on bore-hole water supply, which could be adversely impacted. Development of all of this cell would have negative effect on this SEA objective.</p> <p>Population and Community: Site is located alongside existing housing and a Primary school and at a reasonable walking distance of ‘top up’</p>	<p>INITIAL SHORTLIST: YES FINAL SHORTLIST: YES REG 14 DRAFT ALLOCATION: YES FOR HOUSING REG 16 DRAFT ALLOCATION: NO</p>
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	<p>shopping, Pub and Senior School. It could provide missing community facilities (eg extension of adjacent playing field) and help extend the range of housing available, However it is not in reasonable walking distance of most other facilities. Development of this cell would have positive effect on this SEA objective.</p> <p>Health and Wellbeing: Development here could provide an extension of adjacent playing field. Development of this cell would have positive effect on this SEA objective.</p> <p>Transportation: Located within reasonably flat walking distance of local facilities so likely to encourage modal shift at least for local journeys. Near to bus stops providing services to Looe Town Centre and Plymouth, and additional population may encourage increased frequency. However existing traffic sensitivity may be aggravated by use of private vehicles. Development of this cell would have positive effect on this SEA objective.</p> <p>Note: Following consideration of representations received during Reg 14 Consultations this site was deleted as the housing requirement for Looe has been met.</p>	
<p>3. Land to the East of Looe Academy, Barbican Road Proposed Use: Employment</p>		
	<p>Climate Change: Located within walking distance of local ‘top up’ shops, Pub, Senior and Primary Schools and playing field. On infrequent bus route. Is considerable distance from town centre facilities so potential to increase use of sustainable transport marginal. Aspect/ gradient does not allow maximised solar gain and use of renewable technologies. Entire cell is outside of Flood Zone 3a or 3b. Being alongside existing employment uses could help local firms develop without need to move away/cooperate with each other in energy use/procurement etc. Topography unlikely to impede sustainable design and drainage. Development of this cell would have positive effect on this SEA objective.</p> <p>Biodiversity: Is in Plymouth Sounds and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA) ‘Zone of Influence’ Small scale development here is not considered to have a likely significant effect on the European sites by virtue of the mitigation of recreational impacts from new development provided through Cornwall Local Plan policy 22. The cell not covered by, adjacent or in proximity to a Cornwall wildlife Site, or Ancient Woodland or BAP habitat Drainage controls could protect/enhance biodiversity and lead to net gains that would help offset any losses on site. Development of this cell would have neutral effect on this SEA objective.</p> <p>Landscape: This land parcel has a Low Moderate capacity to accept development as it is part of an intact rural landscape designated an AGLV, where its position is visually prominent lying on and flowing off the high ridge running north to south. The cell is not in proximity to the designated AONB but development of all of this cell would have negative effect on this SEA objective.</p> <p>Historic environment: In an area of anciently enclosed land with high archaeological potential and substantial range of heritage assets nearby. Part of the broader historic land landscape setting of the complex of heritage assets present in the town, that helps understanding of how Looe’s advantageous sea level position, at the mouth of a river, between the higher rolling plateau of manorial above was the cause for its founding as a pair of ‘planted’ towns. Development here would tend to undermine this setting but in particular could harm any buried archaeological evidence for which the site has a high potential. It is concluded that</p>	<p>INITIAL SHORTLIST: YES FINAL SHORTLIST: YES REG 14 DRAFT ALLOCATION: YES FOR EMPLOYMENT REG 16 DRAFT ALLOCATION: NO</p>

	<p>development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Land, Soil and Water Resources: Whilst development of additional employment uses alongside existing businesses may allow for cooperation with each other in recycling etc., this is a greenfield site, all of Grade 2 quality. Close to existing drainage and water supply services. However, several properties nearby rely on bore-hole water supply, which could be adversely impacted. Drainage controls could protect/enhance biodiversity and lead to net gains that would help offset any losses on site. Development of all of this cell would have negative effect on this SEA objective.</p> <p>Population and Community: Site is located alongside existing housing and at a reasonable walking distance of ‘top up’ shopping, Pub, Primary and Senior School. It could help extend the range of employment available in this area of Looe, However it is not in reasonable walking distance of most other facilities. Development of this cell would have positive effect on this SEA objective.</p> <p>Health and Wellbeing: Access to leisure, health and community facilities or to green infrastructure/recreation is not likely to be improved. Whilst some employees may come from local area other would need to drive, so on balance healthier modes of travel are unlikely to be encouraged. Development of this cell would have neutral effect on this SEA objective.</p> <p>Transportation: Located within reasonably flat walking distance of local facilities so likely to encourage modal shift at least for local journeys. Near to bus stops providing services to Looe Town Centre and Plymouth, and additional users may encourage increased frequency. However existing traffic sensitivity may be aggravated by use of private vehicles. Development of this cell would have positive effect on this SEA objective.</p> <p>Note: Following consideration of representations received during Reg 14 Consultations this site was deleted for landscape and viability reasons.</p>	
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4. Land to West of Barbican Road, St Martin

Proposed Use: Residential

	<p>Climate Change Located beyond easy walking distance of local ‘top up’ shops, Pub, Senior and Primary Schools and playing field. On infrequent bus route. Is considerable distance from town centre facilities so potential to increase use of sustainable transport marginal. Aspect/ gradient does not allow maximised solar gain and renewable technologies. Entire cell is outside of Flood Zone 3a or 3b. Development of this cell would have negative effect on this SEA objective.</p> <p>Biodiversity: Is in Plymouth Sounds and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA) ‘Zone of Influence’ Small scale development here is not considered to have a likely significant effect on the European sites by virtue of the mitigation of recreational impacts from new development provided through Cornwall Local Plan policy 22. The cell not covered by, adjacent or in proximity to a Cornwall wildlife Site, or Ancient Woodland or BAP habitat. Drainage controls could protect/enhance biodiversity and lead to net gains that would help offset any losses on site. Development of this cell would have neutral effect on this SEA objective.</p> <p>Landscape: This land parcel has a Moderate capacity to accept housing development as it is intact rural landscape designated an AGLV, where its position is visually prominent in the context of the adjacent modern development lying on and flowing off the high ridge running north to south. The cell is not in proximity to the designated AONB but</p>	<p>INITIAL SHORTLIST: YES FINAL SHORTLIST: NO</p>
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	<p>development of all of this cell would have negative effect on this SEA objective.</p> <p>Historic environment: Development of the cell may dominate the site of Pendrym Manor, which lies slightly below the cell, and effectively destroy the integrity of the old settlement pattern, and seriously disrupt the historic landscape. The field boundaries inform us of the post-mediaeval enclosures and link back to mediaeval Looe. Loss through development would break this link. The high archaeological potential of the site could be seriously harmed through deep foundations, piling or significant earth movements that might be necessary for development. Development of this site, particularly on the northern boundary, could due to the topography dominate the Grade I and II Listed Buildings located in the small settlement immediately to the north. It is concluded that development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Land, Soil and Water Resources: A greenfield site, mostly of Grade 2 quality, but close to existing drainage and water supply services. Topography in parts could impede sustainable drainage. Development of all of this cell would have negative effect on this SEA objective.</p> <p>Population and Community: Site is located alongside existing housing on half of one flank to the south west, and also the Secondary School, but is not a reasonable walking distance of ‘top up’ shopping, Pub, and Primary School. Nor is it in reasonable walking distance of most other facilities. Housing here could as a result be isolated. Unlikely to help with community cohesion. Development of all of this cell would have negative effect on this SEA objective.</p> <p>Health and Wellbeing: Access to leisure, health and community facilities or to green infrastructure/recreation is not likely to be improved by a relatively isolated development here, Development of all of this cell would have negative effect on this SEA objective</p> <p>Transportation: Due to its relative isolation and local topography/settlement pattern, reliance on vehicular travel is likely to be increased. Therefore, existing traffic sensitivity may be aggravated. Development of all of this cell would have negative effect on this SEA objective</p>	
<p>5a Land at Salter Close, Barbican Proposed Use: Residential</p>		
	<p>Climate Change: Located at easy walking distance of Secondary school and by longer route through existing housing to local ‘top up’ shops, Pub, and playing field. although Primary School somewhat further. Short walk to infrequent bus route. Is considerable distance from town centre facilities so potential to increase use of sustainable transport marginal. Aspect/ gradient does not allow maximised solar gain and renewable technologies. Entire cell is outside of Flood Zone 3a or 3b. Topography unlikely to impede sustainable design and drainage. Development of this cell would have positive effect on this SEA objective.</p> <p>Biodiversity: Is in Plymouth Sounds and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA) ‘Zone of Influence’ Small scale development here is not considered to have a likely significant effect on the European sites by virtue of the mitigation of recreational impacts from new development provided through Cornwall Local Plan policy 22. The cell not covered by, adjacent or in proximity to a Cornwall wildlife Site, but is in proximity to an Ancient Woodland or BAP habitat, beyond a proposed buffer area. Drainage controls could protect/enhance biodiversity and lead to net</p>	<p>INITIAL SHORTLIST: YES FINAL SHORTLIST: YES REG 14 DRAFT ALLOCATION: YES FOR HOUSING REG 16 DRAFT ALLOCATION: YES FOR HOUSING</p>

	<p>gains that would help offset any losses on site. Development of this cell would have neutral effect on this SEA objective.</p> <p>Landscape: Cell is within AGLV but not in proximity to a designated AONB. This land parcel has a Moderate High capacity to accept housing development as it is a disturbed arable field, bounded on three sides by residential development. Meeting needs here, rather than at more sensitive locations, development of this cell would have positive effect on this SEA objective.</p> <p>Historic environment: Less prominent than other cells so little impact on the wider historic environment and the setting of heritage assets is anticipated. However, development hard up to the Ancient woodland would further urbanise its setting and potentially cause harm to the health of the trees adjoining the development, adding to their gradual erosion of the heritage asset associated with Pendrym Manor. Also, deep excavations could harm buried evidence associated with prehistoric settlement of the area. With adequate mitigations meeting needs here rather than at more sensitive locations development of this cell would have a positive effect on this SEA objective.</p> <p>Land, Soil and Water Resources: A greenfield site, but mostly of Grade 4 quality, close to existing drainage and water supply services, meeting local needs here will have less effect than alternative sites on surrounding agricultural land. Development of this cell would have positive effect on this SEA objective.</p> <p>Population and Community: Site is located alongside existing housing and easy walking distance of Secondary school and by a longer route through existing housing to local 'top up' shops, Pub, and playing field. although Primary School somewhat further. However, it is not in reasonable walking distance of most other facilities. Development of this cell would have positive effect on this SEA objective.</p> <p>Health and Wellbeing:, The proposed buffer between housing and Ancient Woodland will provide a link with and access to or to green infrastructure/recreation opportunities. Development of all of this cell would have positive effect on this SEA objective</p> <p>Transportation: Located within walking distance of local facilities so likely to encourage modal shift at least for some local journeys. Short walking distance to bus stops providing services to Looe Town Centre and Plymouth, and additional users may encourage increased frequency. However existing traffic sensitivity may be aggravated by use of private vehicles. On balance development of this cell would have positive effect on this SEA objective.</p>	
<p>5b Land at Salter Close, Barbican Proposed Use: Residential</p>		
	<p>Climate Change: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Biodiversity: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Landscape: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Heritage Impact: Not assessed as excluded from initial shortlist.</p>	<p>INITIAL SHORTLIST: NO</p>
<p>6. Land between Sunrising and Shutta Proposed Use: Residential</p>		
	<p>Climate Change: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Biodiversity: Development of this cell would have a substantial negative effect on this SEA objective.</p>	<p>INITIAL SHORTLIST: NO</p>

	<p>Landscape: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Heritage Impact: Not assessed as excluded from initial shortlist.</p>	
<p>7. The Wooldown, East Looe</p> <p>Proposed Use: Residential</p>		
	<p>Climate Change: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Biodiversity: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Landscape: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Heritage Impact: Not assessed as excluded from initial shortlist.</p>	<p>INITIAL SHORTLIST: NO</p>
<p>8 Polean and the Millpool, West Looe</p> <p>Proposed Use: Continued use for car Parking, Small Scale Employment, Cycle Hub, Community Uses (See NDP Policy E1)</p>		
	<p>Climate Change: Some areas heavily overshadowed seasonally by hillsides and trees but otherwise reasonable degree of solar gain and use of renewable and low carbon technologies is possible. The majority of the Cell is Flood Zone 3a where residential use is incompatible, although development on margins of site with small scale employment and other uses is acceptable subject to mitigation to avoid pollution, health and biodiversity harm and risk of additional flooding elsewhere. Focus of employment, tourist and community facilities here at main car park will reduce the number of journeys made to a more dispersed pattern of provision, Cycle hub and link to new cycle trails will promote cycling, walking and public transport. Redevelopment of outworn industrial land at Polean will enable new buildings that meet or exceed sustainable design criteria. Being alongside existing employment uses could help local firms develop without need to move away/cooperate with each other in energy use/procurement etc. Development of appropriate parts of this cell would have positive effect on this SEA objective.</p> <p>Biodiversity: Is in Plymouth Sounds and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA) 'Zone of Influence' Small scale development here is not considered to have a likely significant effect on the European sites by virtue of the mitigation of recreational impacts from new development provided through Cornwall Local Plan policy 22. The cell is partially covered by a Cornwall Wildlife Site, and BAP habitat at its extreme west, and abuts Kilminorth Local Nature Reserve.. Also adjacent to Ancient Woodland. Careful development at Polean to buffer these areas could achieve a net gain in biodiversity and the proposed cycle hub links to new cycleways will add to the network of multi-functional green infrastructure. Opportunities for interpretation could be included. Use of sustainable design criteria would prevent harm to the integrity of the Looe Marine Conservation Zone. Development of this cell as proposed would have positive effect on this SEA objective.</p> <p>Landscape: Considerable distance from AONB but in AGLV located at the confluence of the East and West Looe Rivers. No assessed in LLCA as in flood plain, but considered to have a low moderate capacity for development as the site makes an important contribution to the views and vistas within, into, across and out of the Looe Conservation Area from valley side to valley side, and although mainly a car park it is vitally important to the natural and historic setting of Looe. Restricting development as proposed will help to conserve and enhance locally important landscape and townscape features that are an integral part of</p>	<p>INITIAL SHORTLIST: YES</p> <p>FINAL SHORTLIST: YES REG 14 DRAFT ALLOCATION: YES</p> <p>Employment, Residential and Community Uses</p> <p>REG 16 DRAFT ALLOCATION: YES</p> <p>Employment, Cycle Hub, Community Uses</p>

the sense of place and visual amenity of the Neighbourhood Plan area. Such a small scale of development would have less impact than provision of the facilities proposed at more prominent locations elsewhere around the town. If development is carefully designed to avoid blocking or distracting from views and reflect historic character, then development of this cell as proposed would have **positive effect** on this SEA objective.

Historic environment: As noted above this cell makes an important contribution to the views and vistas within, into, across and out of the Looe Conservation Area, and even in its present form dominated by car parking has heritage setting value as part of the wider story of the area, and contributes to the continuation of Looe's historic role as a tourism destination. The decayed industrial site and former tip at the west end of the cell detracts from the Giants Hedge earthwork. As a complex area a development brief is proposed which will ensure that any development is mainly restricted to the back edge of the Mill Pool, in accordance with flood policy, with the careful redevelopment and extension of the industrial area taking into account the Giants Hedge and any development on the Mill Pool being small-scale and low profile, designed to reflect the historic use of the site. Development on these terms, which draws out and preserves the sites inherent economic, cultural and heritage values and includes appropriate mitigations such as archaeological investigation and interpretation, would have **positive effect** on this SEA objective.

Land, Soil and Water Resources: The entire area is Previously Developed Land, so focusing some development here will save using higher quality greenfield land elsewhere. Being alongside existing employment uses could help local firms cooperate in the minimisation, reuse and recycling of waste and joint recycling of materials. Replacement of existing drainage arrangements through more sustainable building as proposed could minimise water consumption and support improvements to bathing water quality. Development of the site on these terms would have **positive effect** on this SEA objective.

Population and Community: Provision of local employment, cycling and community facilities as proposed will improve the availability and accessibility of key local facilities and encourage and promote social cohesion and encourage active involvement of local people. Development of the site as proposed would have **positive effect** on this SEA objective.

Health and Wellbeing: Provision of cycling and community facilities as proposed will promote accessibility to a range of leisure, health and community facilities, for all age groups, enhance the provision of community access to green infrastructure, promote the use of healthier modes of travel, improve access to the countryside for recreational use and improve the range of accessible facilities available for healthy exercise. Therefore, the development of this site as proposed would have **substantial positive effect** on this SEA objective.

Transportation: Provision of employment, tourist and community facilities here at main car park will reduce congestion and traffic impact on other traffic sensitive areas in Looe and improve road safety. Provision of a cycle hub and link to new cycle trails will encourage modal shift to more sustainable forms of travel. Therefore, the development of this

	site as proposed would have substantial positive effect on this SEA objective.	
9. Land to North of Polperro Road, West Looe		
Proposed Use: Residential		
	<p>Climate Change: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Biodiversity: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Landscape: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Heritage Impact: Not assessed as excluded from initial shortlist.</p>	INITIAL SHORTLIST: NO
10. Land to West of Tregarrick, West Looe		
Proposed Use: Residential		
	<p>Climate Change: Located beyond walking distance of facilities, accessible only by vehicle. Northern part only within walking distance of infrequent bus route. Is considerable distance from town centre facilities so potential to increase use of sustainable transport is limited. Dual aspect/ varying gradient allows some degree of solar gain and use of renewable energy technologies. Entire cell is outside of Flood Zone 3a or 3b. Topography of steeper parts could impede sustainable design and drainage. Development of this cell would have negative effect on this SEA objective.</p> <p>Biodiversity: Is in Plymouth Sounds and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA) 'Zone of Influence' Small scale development here is not considered to have a likely significant effect on the European sites by virtue of the mitigation of recreational impacts from new development provided through Cornwall Local Plan policy 22. Cell is in proximity to a Cornwall Wildlife Site, BAP habitat and Ancient Woodland. Drainage controls into valleys to north and south east could protect/enhance biodiversity and lead to net gains that would help offset any loses on site. Development of this cell would have neutral effect on this SEA objective.</p> <p>Landscape: Cell entirely within AGLV, and in proximity to designated AONB and Heritage Coast to the west and adjacent to the Looe Conservation Area. It has a Low Moderate capacity for development as the undeveloped land retains the natural ridge when viewed from the east and prevents the town of Looe spilling onto and over the open ridge and introducing development into the wider rural farmland landscape. Given the topography of the site, development here is also highly likely to have an impact on the historic landscape and dominate the historic core of West Looe and its important collection of Grade II LBs. Development of this cell would have a negative effect on this SEA objective.</p> <p>Historic environment: Development of the cell may dominate the site of Portlooe Manor (to the south) which is intimately linked with the founding of the 'planted' town of West Looe and so has great local significance. Is also anciently enclosed land of medieval or earlier origin. And there are Neolithic and Bronze Age find-sites in the vicinity suggesting that there may be buried evidence associated with the prehistoric settlement of the area, as well as the medieval. The cell therefore has high archeological potential which could be seriously harmed through deep foundations, piling or significant earth movements that might be necessary for development. Also the cell is located adjacent to the Looe Conservation Area and given the topography of the site, is highly likely to have an impact on its setting and possibly the individual identified heritage assets within the Conservation Area, particularly on the south east side of the</p>	INITIAL SHORTLIST: YES FINAL SHORTLIST: NO

	<p>cell, where it could dominate the historic core of West Looe and its important collection of Grade II LBs, radically altering its setting. Although some mitigations are possible, development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Land, Soil and Water Resources: A greenfield site, mostly of Grade 3 quality, but close to existing drainage and water supply services. Topography in parts could impede sustainable drainage. Development of all of this cell would have negative effect on this SEA objective.</p> <p>Population and Community: Site is located alongside existing housing on its eastern flank and is sufficiently large to accommodate a range of housing needs. However, it is not a reasonable walking distance of ‘top up’ shopping or other facilities. Housing here could as a result be isolated and unlikely to help with community cohesion. Development of all of this cell would have negative effect on this SEA objective.</p> <p>Health and Wellbeing: Access to leisure, health and community facilities or to green infrastructure/recreation is not likely to be improved by a relatively isolated development here, Development of this cell would have negative effect on this SEA objective</p> <p>Transportation: Cell only accessible via northern route from Polperro Road over steep terrain, or via The Garrick, or to the S by West Looe Hill. Development on this cell would have serious landscape impacts, unless restricted to the lower S side, in which case there would be a significant threat to highway conditions on West Looe Hill. Due to its relative isolation and local topography/settlement pattern, reliance on vehicular travel is likely to be increased. Therefore, existing traffic sensitivity may be aggravated. Development of all of this cell would have negative effect on this SEA objective</p>	
<p>11. West Looe Downs Proposed Use: Residential</p>		
	<p>Climate Change: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Biodiversity: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Landscape: Development of this cell would have a negative effect on this SEA objective.</p> <p>Heritage Impact: Not assessed as excluded from initial shortlist.</p>	<p>INITIAL SHORTLIST: NO</p>
<p>12. Land to South of West Looe Hill Proposed Use: Residential</p>		
	<p>Climate Change: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Biodiversity: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Landscape: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Heritage Impact: Not assessed as excluded from initial shortlist.</p>	<p>INITIAL SHORTLIST: NO</p>
<p>13. Land to North of Hannafore, West Looe Proposed Use: Residential</p>		
	<p>Climate Change: Development of this cell would have a substantial negative effect on this SEA objective.</p>	<p>INITIAL SHORTLIST: NO</p>

	<p>Biodiversity: Development of this cell would have a substantial negative effect on this SEA objective.</p> <p>Landscape: Development of this cell would have a negative effect on this SEA objective.</p> <p>Heritage Impact: Not assessed as excluded from initial shortlist.</p>	
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4.33 In the light of this appraisal, it is concluded that sites 5a and 8 are most appropriate for inclusion in the development boundary to meet local housing and employment needs.

CURRENT APPROACH IN THE NEIGHBOURHOOD PLAN AND THE DEVELOPMENT OF NEIGHBOURHOOD PLAN POLICIES

4.34 The Looe Neighbourhood Development Plan recognises the dependency of the town on the sea and river is absolutely fundamental, owing its founding and continued economic, social, environmental well-being and distinctiveness to them. It considers that climate change, leading to rising sea-levels and aggressive storms, more frequent and serious flooding within the harbour and town centre, extended coastal erosion and land instability is a major challenge to the future prosperity of the Town and the health of the local environment. The area is also now also having to face the medium and long-term implications of the Covid-19 pandemic for tourism. The Looe Neighbourhood Development Plan responds to these concerns by aiming to revitalise the maritime and coastal based economy and bring prosperity to all the Town’s community, whilst significantly reducing its impact on the environment, and maintaining its special character.

4.35 The Neighbourhood Plan approach aims to:

- support projects that are helping to resolve the problems caused by climate change,
- ensure that new development is environmentally sustainable and contributes to resolving the causes of climate change,
- take advantage of the opportunities arising from the improvements that will be delivered, and
- protect and enhance the heritage assets, townscape and landscape that make Looe distinctive.

NEIGHBOURHOOD PLAN POLICIES

4.36 To achieve this the submission version of the Looe Neighbourhood Development Plan puts forward 57 policies to guide development in the Neighbourhood Plan area. The policies, which were developed following extensive community consultation and evidence gathering, and refined following Regulation 14 consultation on the Neighbourhood Plan are listed below in Figure 11.

Figure 11: Looe Neighbourhood Development Plan policies.

Policy	Title
TACKLING THE IMPACTS AND CAUSES OF THE CLIMATE EMERGENCY	
Policy CCLS 1:	Designation of Coastal Change Management Area
Policy CCLS 2:	Safeguarding the Looe Flood Defence and Economic Regeneration Scheme
Policy CCLS 3:	Development in locations vulnerable to coastal change.
Policy CCLS 4:	Development on or near to unstable or potentially unstable land
Policy CCLS 5:	Drainage management and land stability
Policy CCLS 6:	Drainage management and flooding
Policy CCLS 7:	Drainage management - sewerage
Policy CCLS 8:	Drainage management and bathing water quality
Policy DS1:	Energy efficient & small carbon footprint development
Policy DS 2:	Renewable energy.
Policy DS 3:	Community sustainable energy

Policy	Title
Policy DS 4:	Digital networks
Policy DS 5:	General Development Principles
Policy HB 1:	Habitat and biodiversity
Policy HB 2:	Woodland, trees, Cornish hedges, and hedgerows
Policy PGS 1:	Local green spaces
Policy GRN 1:	Green infrastructure network
SUPPORTING ECONOMIC DEVELOPMENT AND EMPLOYMENT.	
Policy E 1:	Millpool / Polean master plan
Policy E 2:	Supporting the harbour and marine businesses.
Policy E 3:	Safeguarding of existing employment sites
Policy E 4:	Small scale workshop and office development
Policy E 5:	Employment opportunities in residential areas
Policy E 6:	Redevelopment of Looe fire station
Policy E 7:	Future community service reserve
Policy E 8:	Redevelopment of Polvellan House
SUPPORTING SUSTAINABLE TOURISM	
Policy TOUR 1:	Sustainable and ecotourism
Policy TOUR 2:	Supporting events and festivals infrastructure
Policy TOUR 3:	Looe cycleway hub
Policy TOUR 4:	Modern tourism accommodation
Policy TOUR 5:	Protection of existing stock of tourism accommodation
Policy TOUR 6:	Peer to peer (P2P) accommodation
Policy TOUR 7:	Controlling the spread of second homes and holiday lets
MEETING HOUSING NEEDS	
Policy H 1:	Meeting housing needs
Policy H 2:	Live/work units
Policy H 3:	Housing for older people
Policy H 4:	Extra Care Housing
CONSERVING & ENHANCING THE TOWN CENTRE, HERITAGE, AND DESIGN	
Policy TC 1:	Maintaining the town centre as a retail and social destination
Policy TC 2:	New uses for upper floors in the town centre
Policy TC 3:	Design and Local Distinctiveness in Looe's Historic Core
Policy TC 4:	Heritage Impact Assessment
Policy TC 5:	Demolition of Buildings and Structures in Looe's Conservation Area
Policy TC 6:	Shopfronts and Commercial Signage in Looe's Conservation Area
Policy TC 7:	Window and Door Repair and Replacement in The Historic Core
Policy TC 8:	Building Height
Policy TC 9:	Development of Steep Slopes
Policy TC 10:	Landscape and Heritage Views and Vistas
Policy TC 11:	Looe town centre broadband, wi-fi and other digital communications
SUPPORTING & IMPROVING COMMUNITY FACILITIES	
Policy C 1:	Community facilities
Policy C 2:	Neighbourhood shops & facilities
Policy C 3:	Enhancement of community health service provision
Policy C 4:	Community recreation open space protection and provision
Policy C 5:	Sport and physical activity
ENHANCING CONNECTIVITY	
Policy T 1:	Traffic Sensitivity and Development
Policy T 2:	Car Parking on Steep Slopes.
Policy T 3:	Cycle proofing
Policy T 4:	Footpath and cycle path network.
DELIVERY PLAN	
POLICY DP 1:	Making It Happen - Community Priorities

5. WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?

INTRODUCTION

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

APPROACH TO THE APPRAISAL

- 5.2. The appraisal is structured under the eight SEA themes taken forward for the purposes of the SEA.
- 5.3. For each theme, ‘significant effects’ of the submission version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect ‘characteristics’ are described within the assessment as appropriate.
- 5.4. Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

CLIMATE CHANGE:

- 5.5. The Looe Neighbourhood Plan is based on the premise that the local implications of global warming for Looe are profound. Already Looe is the most frequently flooded town in the UK, with £39m of damage in the last 5 years and 65% of town centre businesses flooded on a regular basis. Without action, the current flooding area (2.5 ha) could extend to cover 16ha in the future, regularly inundating the town centre, the harbour, key community service sites and transport links, with the frequency of flooding increasing six-fold. Higher rainfall and more intensive storms are forecast to increase the erosion of cliffs and unstable land conditions above cliff toes, leading to danger to life and loss of cliff top properties. Significantly raised levels of surface water run-off will cause increased surface flooding, blocking and damaging access routes, damage to cliffs and hillsides, causing instability and erosion. Increases in rainfall total and intensity combined with dry spells may significantly increase risk of instability across the whole of Looe. This increased run off, combined with foul drainage surcharging, will seriously harm the quality of the waters in Looe Bay, in turn affecting the marine ecosystem which sustains Looe’s marine wildlife, and the quality of the bathing waters which are so important to local people and holidaymakers using Looe’s beaches. The climate emergency is thus a fundamental challenge to the Towns environmental, economic and social well-being.
- 5.6. On 22nd January 2019 Cornwall Council resolved to declare a ‘climate emergency’ in the context of Cornwall Council’s target for Cornwall to become carbon neutral by 2030. In May 2019 Looe Town Council also declared a Climate emergency. These are seen, in the Neighbourhood Plan’s ‘Overview of the Issues and Implications...’ as a significant ‘call to action’ for the Looe NDP to tackle the causes and consequences of climate change and help to embed environmentally sustainable

practices in response to the challenges faced. The first set of policies in the Neighbourhood Plan, 'Tackling the Impacts and Causes of the Climate Emergency' deals with these issues.

- 5.7. With reference to adapting to the effects of climate change, Policy CCLS 1 defines a Coastal Change Management Area in which Policy CCLS3 seeks to ensure that no inappropriate development occurs in areas where coastal change is occurring or anticipated, and, will not affect the natural balance and stability of the coastline or exacerbate the rate of shoreline change to the extent that changes to the coastline are increased nearby or elsewhere. Policy CCLS 2 'Safeguarding the Looe Flood Defence and Economic Regeneration Scheme' is particularly important as it aims to ensure that the achievement of the necessary flood prevention measures is not blocked or caused to incur greater environmental impacts and greater costs by other unrelated new development in its vicinity. Policy CCLS 4 seeks to ensure there is appropriate control over development on unstable land so as to avoid any unnecessary risks, whilst policies CCLS 5, 6, 7 and 8 work to ensure that drainage arrangements in new development take into account forecast climate change led increases in rainfall total and intensity and do not cause or worsen land instability, flooding, and pollution, or bathing water quality. These can also help ensure that there is no detrimental impact on the Tamar Estuaries Complex SPA, the Tamar Estuary SAC, or the Whitsand and Looe Bay Marine Conservation Zone, and Looe's bathing water quality. Additionally, the protection of open spaces and habitats within the Neighbourhood Plan area through the provisions of Policy GRN 1 'Green Infrastructure Network', Policy PGS 1 'Local Green Spaces', Policy HB 1 'Habitats and Diversity' and Policy HB 2 'Woodland, trees, Cornish hedges, and hedgerows' will safeguard natural carbon sequesters located within the landscape (i.e. trees and hedgerows). This will positively respond to the potential effects of climate change (particularly from extreme weather events) through providing summer shading and reducing surface water run-off.
- 5.8. In terms of climate change mitigation. Policy DS1 'Energy Efficient and Small Carbon Footprint Development' encourages proposals for new developments which deliver a high level of sustainable design and construction. Measures listed include securing at least 10% of total energy generation from on-site renewables, the use of high-quality and thermally efficient building materials, and the installation of loft insulation, wall insulation and double glazing and the sensitive retrofitting of energy efficiency measures in heritage buildings to reduce energy demand. Policy DS 2 supports renewable energy development above Permitted Development levels to serve individual properties or groups of properties, but only at a small scale that takes into account the local landscape's moderate-high sensitivity to wind energy and solar photo voltaic [PV] development. Policy DS 3 'Community Sustainable Energy' is supportive of such schemes where they integrate into the local grid so that the energy generated can be supplied directly to domestic, business and other buildings within the Looe NDP area. Policy DS 4 'Digital networks' encouraged development to include infrastructure for internet and mobile communications, which may help reduce the need to travel for business and services.
- 5.9. Whilst Looe has a higher proportion of residents who walk to work than is typical, road transport is an increasingly significant contributor to greenhouse gas emissions in the Neighbourhood Plan area. The Development Boundary approach adopted in the Neighbourhood Plan aims, amongst other things, to ensure that new development is sustainably located. Policy T3 'Cycle Proofing' aims to ensure that cycling is recognised and reflected in the design of new development may help to support modal shift and reduction in greenhouse gas emissions as does Policy T4 'Improving the network of footpaths and cycle paths' and Policy Tour 3 'Looe Cycle Hub'.
- 5.10. As a global issue, the effect of the looe Neighbourhood Development Plan in tackling the causes of climate change can only be limited. However, in local terms the measures proposed to adapt to change could make a significant contribution. It is therefore concluded that the submission version of the Neighbourhood Plan is likely to lead to **significant positive effects** in relation to the 'Climate Change' SEA theme.

- 5.11. The Neighbourhood Plan area is relatively constrained in biodiversity terms. It is within the ‘Zone of Influence’ for the Plymouth Sounds and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA). It is also within the Impact Risk Zones for two SSSIs to the west in Lansallos Parish. The Whitsand and Looe Bay Marine Conservation Zone overlaps with the NDP area at the coastal margin, but is heavily influenced by flood protection, land drainage and planning and development management within the NDP area and beyond it in adjoining areas. Six County Wildlife Sites, mainly comprising deciduous woodlands, are present in or overlap with the Looe NDP area. All these sites also feature Biodiversity Action Plan (BAP) Priority Habitats. Two large areas of Ancient Woodland are within or overlap with the NDP area, both contributing significantly to local biodiversity and landscape character. One of these areas, Kilminorth Wood is also a Local Nature Reserve. Additionally, the Neighbourhood Plan area contains a variety of Biodiversity Action Plan (BAP) Priority Habitats and Species. The National Forestry Inventory indicates that on its approaches the NDP area is well ‘wooded’ although the area itself is fairly sparsely covered.
- 5.12. Whilst no significant negative effects on biodiversity can be readily identified, there will be a need for potential effects on biodiversity linked to future development in the Neighbourhood Plan area to be avoided and mitigated. Therefore, the Neighbourhood Plan sets out provisions which will help limit potential effects from new development on features and areas of biodiversity interest and support the resilience of ecological networks. It should be noted in this regard that the Looe Flood Defence and Economic Regeneration Scheme is not a proposal of the Neighbourhood Plan and falls within the remit of separate regulatory regimes.
- 5.13. To accompany the preparation of the Cornwall Local Plan, a Habitats Regulations Assessment (HRA)⁹ was undertaken to consider the potential impacts of the Plan to European designated sites for biodiversity located within and within proximity to the Plan area. The HRA identifies several threats to these sites (i.e. air quality, water resources, water quality and coastal squeeze). However, recreational pressure from additional housing development and tourism in Cornwall is acknowledged as a significant threat to the Plymouth Sounds and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA). within the HRA, with Natural England recommending a 10km zone of influence around the site based on the initial findings of the visitor survey. Additionally, ‘public access and disturbance’ is recognised as a key issue within the Site Improvement Plan (SIP)¹⁰ for the SAC. In this respect, Policy PGS 1 Local green spaces and Policy C 4 ‘Community recreation open space protection and provision’ indicate that the loss of the 27 Local Green Spaces and recreational spaces within the Neighbourhood Plan area will only be permitted in exceptional circumstances, where it can be demonstrated that satisfactory alternative provisions can be made or where the needs of the proposed development clearly outweigh their loss. Therefore, these policies have the potential to indirectly benefit the European sites through protecting the number of alternative open spaces for recreational uses within the Looe NDP area. The protection of these spaces will also bolster locally important areas of Biodiversity Action Plan (BAP) priority habitats in the Looe Neighbourhood Development Plan area against potential threats from development, by maintaining the availability of connectivity corridors and stepping stones between them. Given the Neighbourhood Plan will be in conformity with the quantum and location of development in the Local Plan, no additional effects are anticipated in relation to the integrity of the Plymouth Sounds and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA)..

⁹ Cornwall Council (2017): ‘Sustainability Appraisal and Habitat Regulation Assessment’, [online] available to access via: <<https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/sustainability-appraisal-and-habitat-regulation-assessment/>>

¹⁰ Natural England (2014): ‘Site Improvement Plan: Plymouth Sound and Tamar Estuary (SIP174)’ [online] available to download via: <<http://publications.naturalengland.org.uk/publication/6283453993582592>>

- 5.14. In relation to the SSSIs located within proximity to Looe, in Lansallos parish to the west, the whole of the Neighbourhood Plan area is within Site of Special Scientific Interest (SSSI) Impact Risk Zones (IRZ)s for residential, rural residential and rural non- residential development types. However, as the proposed spatial strategy within the Plan seeks to deliver development at a small scale mainly through an allocation site for about 25 dwellings, residential infill and Previously Developed Land development within a defined Development Boundary, and small scale rural exception housing immediately alongside the Development Boundary (as outlined through Policies H 1 to H 4), this will help to limit the potential risks to nationally designated sites for biodiversity and geodiversity due to the SSSI's relative distance from existing settlements. Likewise, the scale of proposals likely to come forward through the Neighbourhood Plan are less likely to meet or exceed the SSSI IRZ development thresholds.
- 5.15. Published in 2019, paragraph 170 (d) within the revised NPPF¹¹ states that planning policies and decisions should contribute to and enhance the natural and local environment by 'minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks', with paragraph 32 outlining that spatial development strategies should demonstrate how opportunities for net gains have been addressed. An environmental net gain principle for development is also embedded within the goals and policies of the UK Government's 25-Year Environment Plan¹² which was published in January 2018. In this regard, Policy HB 1 'Habitats and Biodiversity' recognises the value of the ecological diversity within the Neighbourhood Plan area. Development proposals will be expected to demonstrate how they minimise negative impacts and achieve at least a 10% net gain in biodiversity through a Biodiversity Metric Gain Plan. In this respect, the policy states that each Biodiversity Metric Gain Plan should use appropriate methods drawn from the guidance in the Cornwall Biodiversity Supplementary Planning Document (SPD), that are consistent with the British Standard for Biodiversity [BS42020] and supports Cornwall's Environmental Growth Strategy. Each plan should also explain how Mitigation Hierarchy has been followed (including proposals for any necessary compensation) and how the proposal will integrate into any wider green infrastructure network
- 5.16. Ecological networks within the Neighbourhood Plan area are further supported by Policy GRN 1 which defines a Green Infrastructure Network across the Looe NDP area. Specifically, the policy affirms that development proposals on land that lies within or adjoining the network should not compromise its integrity and seek to enhance biodiversity and geodiversity. Additionally, the provisions of Policy HB 2 'Trees, Cornish Hedges and Hedgerows' will ensure that development proposals are sympathetic to these features and deliver appropriate mitigation where required.
- 5.17. The provision of these policies will ensure that ecological sensitivities are appropriately considered during the planning, construction and operational phases for new development proposals which come forward during the plan period. As such, the Neighbourhood Plan sets out a range of provisions which will support and enhance habitats, species and ecological networks in the Neighbourhood Plan area.
- 5.18. It is concluded that the submission version of the Neighbourhood Plan is likely to lead to **positive effects** in relation to the 'Biodiversity and Geodiversity SEA theme.

LANDSCAPE:

- 5.19. The Looe NDP designated area falls within national character area 152: 'Cornish killas' and comprises a typical Cornish coastal landscape. The western most quarter of the neighbourhood plan

¹¹ 'Revised National Planning Policy Framework', [online] available to access via:
<<https://www.gov.uk/government/collections/revised-national-planning-policy-framework>>

¹² DEFRA (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via:
<<https://www.gov.uk/government/publications/25-year-environment-plan>>

area is located within the boundary of the Cornwall AONB. This area has an open coastal landscape incised by the short coastal stream dropping from Portlooe to Port Nadler Bay. It is mainly agricultural but features a small hamlet (Portlooe) and Tencreek holiday park. The AONB Management Plan 2016 - 2021 describes¹³ ‘... a mix of arable and pastoral farming in a medieval field enclosure system with medium sized fields. The narrow lane network connecting the farms with small hamlets are enclosed by high Cornish hedges of slate which are well vegetated....’ That part of the Neighbourhood Development Plan designated area that is AONB is also part of the Gribben head to Polperro Heritage Coast. The remainder is an AGLV, the description of which notes that the landscape is ‘...dramatic with steep breaks in the topography and steeper sides to the valley. The inland landscape is protected by a high coastal ridge which on the seaward side is terminated by rocky cliffs broken by small inlets and coves’. The Cornwall Local Landscape Character Assessment notes that ‘the urban edges of Looe... are also making an impact on the area where they are creeping onto the high ground’ as are tourism / recreation pressures. The landscape of Looe is also has historic significance, consisting for the main part of Anciently Enclosed Land.

- 5.20. To aid in developing Looe Neighbourhood Development Plan strategy for growth, a Local Landscape Character Assessment was carried out which supplemented the Cornwall LLCA more detailed character information under the headings ‘Rolling Farmland’ and ‘Steep Sided Valleys’.
- 5.21. Policies within the Neighbourhood Plan seek to draw on these factors and have a strong focus on protecting the sense of place and special qualities of Looe which contribute to its character, respecting the setting of the AONB and safeguarding the integrity of the landscape character areas. For example Policy DS 5 supports development which avoids adverse impact (visual or otherwise) on the area’s landscape, and demonstrates how it minimises landscape impacts on the open countryside and coastline, from both seaward and landward aspects through the use of landform, trees and locally appropriate planting.
- 5.22. The views across and along the two river valleys, the townscape looking up the valley sides from the river and town, and long-distance views along the coast and inland are an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed. Changes, such as development and landscape change, can see these views degraded overtime. In this respect, Policy TC 10 ‘Landscape and Heritage Views and Vistas’ supports proposals which are accompanied by an appropriate landscape and visual impact assessment that clearly sets out and demonstrates how they take into account and address the foreground, middle ground and background impacts of development on the locally distinctive landscape and heritage characteristics of Looe. Opportunities to reduce the domination of late 20th century housing located on the skyline are supported.
- 5.23. Through Policy TOUR 1 ‘Sustainable and Eco-Tourism Development’ tourism proposals that capitalise on and offer protection to the Town’s landscape, river and seaside, built heritage features and attractive rural coastal setting are supported. Along with policies which support the protection of green spaces (Policy PGS 1) that in part contribute to the landscape quality of the area, the provisions of Policy H1 ‘Meeting Housing Needs’ seeks to prevent sprawl into the countryside by focusing development within the existing built-up area.
- 5.24. It is concluded that the submission version of the Neighbourhood Plan is likely to lead to **positive effects** in relation to the ‘Landscape’ SEA theme.

HISTORIC ENVIRONMENT:

- 5.25. The Neighbourhood Plan area hosts an extensive variety of heritage assets which reflect the towns long history as a busy seaport and fishing community. Many of these are nationally and locally

¹³ Cornwall AONB Partnership ‘Cornwall AONB Management Plan 2016 to 2021’ available at <<https://www.cornwall-aonb.gov.uk/management-plan>>

designated heritage assets. There is 1 Grade I listed building, 8 Grade II* listed buildings, and 113 Grade II listed buildings, and 1 scheduled monument, Looe Conservation Area covers most of the town. There are 161 records on the Historic Environment Record for Cornwall, within the Looe Neighbourhood Development Plan area, including a variety of structures and archaeological finds with a mining legacy, medieval and post-medieval features, and finds dating back to the Bronze Age, Neolithic and Roman eras.

- 5.26. The 2002 Cornwall Industrial Settlements Initiative Report and the subsequent Conservation Area Appraisal and Management Plan 2009 provide an in-depth understanding of the special interest of the area, and the challenges it faces. It is apparent from the 2017 Heritage Assessment that many of the issues persist and may be expected to persist into the future unless a firmer planning policy base backed by stronger encouragement and enforcement is put in place.
- 5.27. Of greatest concern is that without action, to control the impacts of climate change, the current flooding area (2.5 ha) could extend to cover 16ha in the future, regularly inundating the town centre, and harbour, with the frequency of flooding increasing six-fold. It is the town centre that has the major concentration of heritage assets and hosts a precious historic environment.
- 5.28. These concerns are reflected by Neighbourhood Plan policies which have a strong focus on conserving and enhancing the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their settings.
- 5.29. Of greatest impact is climate change mitigation policy CCLS 2 ‘Safeguarding the Looe Flood Defence and Economic Regeneration Scheme’ as it aims to ensure that the achievement of the necessary flood prevention measures that would protect the historic core of Looe is not blocked or caused to incur greater environmental impacts and greater costs by other unrelated new development in its vicinity.
- 5.30. Policy TC 3 ‘Design and Local Distinctiveness in Looe’s Historic Core’ seeks to sustain, reinforce and enhance Looe’s distinctive character by supporting development which respond positively to local identity and distinctiveness, guided by nine character area context statements elaborated in the Neighbourhood Plan. Policy TC 4 ‘Heritage Impact Assessment’ draws attention to the need for heritage impact assessment to demonstrate that any harmful impact of a development on the significance of assets and their contribution to the historic character of the setting is adequately mitigated or that enhancement results. Harm to the historic character of the town centre through loss of buildings and structures that make a positive contribution is controlled under Policy TC 5, whilst unsympathetic shop front, canopy and signage design is focused on in Policy TC 6. The continuing problem of inappropriately designed window and door repair and replacement is addressed under Policy TC 7. Policies TC 8, TC 9 and T 2 make provisions to avoid harm to the historic environment from excessive building heights, poorly designed development on steep slopes and ‘parking platforms’. With regard to the potential impact of digital communications equipment on heritage assets, Policy TC 11 ‘Looe town centre broadband, wi-fi and other digital communications’ supports retro-fitting to buildings in the Conservation Area subject to criteria intended to limit harm to them.
- 5.31. The provisions of Policy H1 ‘Meeting Housing Needs’ which seeks to prevent sprawl into the countryside by focusing development within the existing built-up area provides a degree of protection to the historic landscape. It also requires that proposals should demonstrate that they are responsive to and informed by the historic and landscape character of their site and an understanding of setting and wider context of any historic environment assets nearby. It also calls for archaeological and heritage assessments and agreement to archaeological investigation and heritage impact mitigations where required. As noted in the preceding section, Policy TC 10 ‘Landscape and Heritage Views and Vistas’ supports proposals that demonstrates how they take into account and address the impacts of development on the locally distinctive landscape and heritage characteristics of Looe. Through Policy TOUR 1 ‘Sustainable and Eco-Tourism Development’ proposals that capitalise on and offer protection to the built heritage features are supported.

- 5.32. Polvellan House, currently derelict, is an unlisted heritage asset with considerable historic environment and landscape importance within the Conservation Area, that in its present condition detracts from those values. Therefore, Policy E 8 ‘Redevelopment of Polvellan House’ encourages beneficial future uses subject to heritage and landscape criteria.
- 5.33. When these policies are implemented it is likely that potential for new development in the Neighbourhood Plan area to impact on the fabric and setting of heritage assets will be reduced, and opportunities will arise for new development to enhance the historic setting of the town and better reveal assets’ heritage significance. It is concluded that the submission version of the Neighbourhood Plan is likely to lead to **significant positive effects** in relation to the ‘Historic Environment’ SEA theme.

LAND, SOIL AND WATER RESOURCES:

- 5.34. In the absence of a detailed Agricultural Land Classification assessment for the majority of the Designated Area, it remains uncertain whether new development in the Neighbourhood Plan area will lead to losses of higher quality (best and most versatile) agricultural land. However, given the scale of development likely to be proposed in the NDP the impact is unlikely to be significant. Also the proposed spatial strategy within the Plan seeks to deliver development at a small scale mainly through an allocation site for about 25 dwellings, residential infill and PDL development within a defined Development Boundary, and small scale rural exception housing immediately alongside the Development Boundary (as outlined through Policies H 1 to H 4) which may also be expected to minimise the use of higher quality agricultural land.
- 5.35. Although the ecological and chemical quality of the Looe River was identified as ‘Good’ in 2016, bathing water quality at East Looe Beach was last recorded (2019) as being only ‘sufficient’. The condition of water resources and bathing water quality in the NDP area are very much dependent on influences active outside its boundaries. Water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are should lead to continued improvements to water quality within the Neighbourhood Plan area and wider area. However, continued development along with climate change-led increases in rainfall intensity and amount pose a threat to this position. As future development within the NDP Designated Area has the potential to affect water quality through diffuse pollution, wastewater discharges, misconnections, water run-off, the Looe Neighbourhood Development Plan can make a contribution. Policy CCLS 8 ‘Drainage management and bathing water quality’ confirms that development will be supported where it includes additional drainage measures which will ensure that the water environment of the Looe River is enhanced and maintained at the highest quality. This will positively contribute to water quality improvements through limiting suspended solids entering watercourses from surface water run-off, positively contributing to the Water Framework Directive’s objective of achieving ‘good status’ for as many watercourses as possible by 2027. Policy CCLS 7 ‘Drainage management - sewerage’ supports development which incorporates a 200-year worst case water run-off attenuation plan and there is sufficient capacity within the existing network.
- 5.36. The Neighbourhood Plan also seeks to incorporate existing natural features such as trees, hedgerows and ponds within new development areas through the provision of Policy HB 1 ‘Habitats and Diversity’ and Policy HB 2 ‘Woodlands, Trees, Cornish Hedges and Hedgerows’. The protection and enhancement of open areas are also supported through the provisions of Policy GRN 1 ‘Green Infrastructure Network’ and Policy PGS 1 ‘Local Green Spaces. These policies will further promote the ability of natural processes to safeguard and enhance soil and water resources
- 5.37. In order to promote the best use of land, Policy E 8 ‘Redevelopment of Polvellan House’ encourages beneficial future uses of the currently derelict site subject to heritage and landscape criteria.

- 5.1. Although some of these policies may only make a limited contribution to resolving water quality issues it is concluded that the submission version of the Neighbourhood Plan is likely to lead to **positive effects** in relation to the 'Land, Soil and Water Resources' SEA theme.

POPULATION AND COMMUNITY:

- 5.38. Looe has an ageing demographic, both from the ageing of its indigenous population and the influx of retiring or down-sizing migrants. In 2017 people of 65 plus represented 31.8% of the population, compared to 26.9% in 2001. This trend is likely to continue and increase, with 57.6% of the population already being 50 years old or more. As the population continues to age, this has the potential to place pressures on the existing services and facilities within the timeframe of the Neighbourhood Plan and the requirement for specialist services and housing will increase. To help counter these implications, Policies H 3 and H 4 support PDL and exception site development for older persons and Extra Care accommodation, whilst Policy C3 'Enhancement of community health service provision' provides for improved accessibility to enhanced local health and other care services. Policies C 1 'Community Facilities' and C 2 'Neighbourhood shops & facilities' more generally support provision and enhancement of facilities and local shops designed to meet each neighbourhood's present and future needs and help to improve social interaction, foster community spirit and responsibility. Policy C1 also confirms that development will be supported which includes provision to diversify and enhance the range of services and community facilities to meet current and future community needs.
- 5.39. As the population grows older and the cohorts of younger people diminish, it is possible that their needs may be lost amongst the focus on the needs of the elderly. Combined with the purchasing power of in-migrants and those seeking second homes this may continue to make it difficult for local young people to enter the home ownership market. To address these issues Policy H 1 'Meeting Housing Needs' calls for the inclusion in new housing schemes of starter and family homes on sites close to services and self-build and self-completion homes to meet the needs of first-time buyers seeking affordable accommodation. Of particular importance is Policy TOUR 7 'Controlling the spread of second homes and holiday lets' which aims to restrict new build, open market housing to use as the principal residence of the householding owners and alter the approach to planning restrictions on holiday accommodation so as to increase the amount of market and rental properties available to local people. The provision of these policies will therefore support mixed, balanced and inclusive communities, aligning with both national and local policy objectives. Policies C4 and C5 on community recreation open space protection and provision, and recreation/sport will also help address the needs of younger people.
- 5.40. The Neighbourhood Plan also contains several policies which will positively support the quality of life of residents and the satisfaction of residents in the Neighbourhood Plan area as a place to live. Policy T1 'Traffic Sensitivity and Development' states that development proposals of more than four dwellings will be supported where the design incorporates a traffic calming layout. This will positively contribute to the principle of safety in design. Moreover, Policy DS 5 'General Development Principles' acknowledges that new developments will be supported where they feature elements designated to prevent crime, anti-social behaviour and disorder, and provide a secure environment. Policy T4 'Footpath and cycle path network.' supports the improvement and extension of paths and cycleways that improve access to local services, including that their design takes into account people with disabilities by applying the principle of 'Least Restrictive Access'.
- 5.41. Recognising that local wage rates in tourism and care services can be very low, and that the prosperity of the Town is particularly vulnerable to the impacts of climate change, policies within the Neighbourhood Plan aim to support sustainable economic growth that safeguard, enhance and diversify local employment in ways that are appropriate in scale and well-integrated with the special and distinctive character of Looe. Policy E 1 supports the careful introduction of new uses on Millpool/Polean area including an 'ECO business park' and innovation hub, a cycle hub linking into

new cycle trails, and artist studio space, and shop to take advantage of footfall due to the location of the town's major car park nearby. Policy E 2 'Supporting the harbour and marine businesses' and E 4 'Small scale workshop and office development' support sustainable development which enhances existing businesses that are less vulnerable to climate change and can add value to the Harbour improvements scheme. Policy E 5 'Employment in Residential Areas' is supportive of proposals to provide small-scale opportunities, including live-work units, providing that the proposals would not result in the loss of a dwelling and would not unacceptably detract from the residential amenity of nearby properties.

- 5.42. Other steps in the Looe Neighbourhood Development Plan to support the Looe's population and community are Policy E 6 'Redevelopment of Looe Fire Station' and which will Policy E 8 'Redevelopment of Polvellan House' will improve opportunities for housing, jobs and services. As these involve specific sites, they have been SEA assessed in more detail at Appendix 7.
- 5.43. The potential of tourism to better support the local community prosperity and services is pursued through Policy TOUR 1 'Sustainable and ecotourism' which is supportive of new and extended tourism facilities which capitalise on local assets and are socially inclusive, facilitating use by all sectors of the local community, including people with impaired mobility and other disabilities such as impaired sight or hearing. Tour 2 'Supporting events and festivals infrastructure', TOUR 3 'Looe cycleway hub' and TOUR 5 'Protection of existing stock of tourism accommodation' all have the potential to draw in higher spending tourists and provide additional jobs and facilities for local people. TOUR 4 'Modern tourism accommodation' and TOUR 6 'Peer to peer (P2P) accommodation' help to ensure that Looe stays abreast of rising customer expectations.
- 5.44. The Neighbourhood Plan also recognises the value of the digital economy in the Looe NDP area and flexible working practices, with a higher percentage of residents choosing to work from home in comparison to regional and national trends. Policies DS 4 'Digital Networks' and TC 11 'Looe town centre broadband, wi-fi and other digital communications' outlines support for developments which incorporate suitable infrastructure to connect to the internet (i.e. through fibre optic cables or ducting) to support social interaction, health, well-being and employability, and new retail business models, which are now all increasingly dependent on the internet to access information, services and support, thus reducing social isolation and socio-economic disadvantage.
- 5.45. Future economic conditions will be subject to global market shifts and so the effect of some of these policies may be delayed or the level of change may be sufficient to justify a review of the Neighbourhood Development Plan before 2030. The policies relating to tourism are considered to be very flexible and have been designed during the Covid-19 pandemic, so can reasonably be expected to accommodate consequential changes in the tourism market. Together with the approach to climate change adaptation, this can be expected helping to maintain and enhance the prosperity of the community in the Designated Area. It is concluded that the submission version of the Neighbourhood Plan is likely to lead to **positive effects** in relation to the 'Population and Community' SEA theme.

HEALTH AND WELLBEING:

- 5.46. Reflecting the outcomes of the JSNA for Cornwall, the 2017 Health Profile for the Looe-Liskeard Community Network Area (CNA) contains a variety of key statistics which help to build an understanding of the community needs, as does the 2011 Census 'snapshot'. The findings reveal that health and wellbeing levels within the Looe Neighbourhood Development Plan area are generally lower than regional and national averages with a lower percentage of residents reporting 'good' or 'very good' health. A higher proportion of residents report that their activities are limited in some way compared to regional and national averages. A growing and ageing population within the Neighbourhood Plan area may increase the reported cases of disability, further reduce the levels of good health, and place future pressures on health services in the wider area. About a third of local children are overweight or obese, whilst in terms of exercise, levels of no or low activity affect

nearly half the population. These factors will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

- 5.47. In this respect, the policies contained within the Neighbourhood Plan will bring a range of benefits for the health and wellbeing of residents within the Looe NDP area, as well as addressing some of the key statistics within the CNA health profile. For example, Policy T 1 'Traffic Sensitivity and Development' is intended to enable safe walking or cycling to transport hubs, play areas and key community infrastructure, and which enhances road safety and air pollution. Policy T4 'Footpath and cycle path network' aims to improve and extend paths which link to local services and facilities. designed and improved to be accessible to all including people with disabilities by applying the principle of 'Least Restrictive Access'.
- 5.48. This will help to ensure that the plan provides for minority groups within the population through encouraging active lifestyles., The policy also aims to ensure that these features are incorporated into new developments and are designed as part of landscaped wildlife corridors rather than being routed along road pavements as part of the highway network.
- 5.49. There is a strong drive in the Neighbourhood Plan to maintain and improve access to open spaces to that can contribute to health and well-being. Policy GRN 1 'Green Infrastructure Network' confirms that development proposals located within or adjacent to the network should incorporate provisions to improve the health and wellbeing of the local community, based on an up-to-date understanding of the needs of all ages. The policy goes on to state that proposals should contribute to the connectivity of the network through "landscaping scheme, layout, access and public open space provision". Policy PGS 1 'Local Green Spaces' and Policy C 4 'Community recreation open space protection and provision' also designates several such sites within the Neighbourhood Plan area and outline provisions to protect their integrity, special character and significance. Amongst other things, Policy C 4 'Community Facilities' also aims to preserve opportunities for healthy pastimes, such as sports clubs and allotments. Focusing directly on sports and physical activity, Policy C 5 supports additional or enhanced facilities that will provide opportunities for involvement in healthy physical activity. The Looe Neighbourhood Development Plan also includes projects for a skateboarding site, a Wild Play site, and an initiative to support the formation of a local partnership to develop and manage a facility which aims to meet the needs of local athletes.
- 5.50. Recognising the growing prevalence of an ageing population within the Neighbourhood Plan area, Policy H 1 'Meeting Housing Needs', H 3 'Housing for older people and Policy H 4 'Extra Care Housing' are supportive of development proposals which meet a locally identified need for affordable housing for elderly and/or disabled residents which are, amongst other considerations, designed to be flexible and easily adaptable for changing circumstances. This is important in the local context, as the quality and availability of housing is an important contributor to health and wellbeing.
- 5.51. The benefits to emotional wellbeing and mental health resulting from close contact with the natural environment and the perception of a 'sense of place' are well-documented. The Looe Neighbourhood Development Plan Policy TC 10 specifically recognises that familiar local views can affect psychological and social well-being and are part of the sustainable development concept and seeks to ensure that the special characteristics of Looe rural and urban area are not harmed by new development.
- 5.52. Policy E 7 'Future Community Service Reserve at East Looe Police Station Site' supports a new 'Blue Light' centre at the East Looe Police Station which, as a location less constrained by flood risk would allow more secure and rapid emergency deployment to the now expanded community it serves (including Polperro) and be able to offer improved premises that incorporate modern equipment and work areas, supporting an improved service, thereby enhancing community safety. This is assessed at Appendix 7.
- 5.53. Overarching above all this however is the significant threat to community health and well-being that climate change will bring. By placing the need to tackle this challenge at the centre of its

strategy, the Looe Neighbourhood Development Plan can be expected to make a significant contribution to the task.

5.54. It is concluded that the submission version of the Neighbourhood Plan is likely to lead to **positive effects** in relation to the 'Health and Wellbeing' SEA theme.

TRANSPORTATION:

- 5.55. Each Local Transport Authority in England and Wales has a statutory duty to produce, adopt and regularly review their Local Transport Plan (LTP). In this regard, 'Connecting Cornwall 2030'¹⁴ is the third Local Transport Plan (LTP) for Cornwall. The plan is a strategic policy tool through which the council exercises its responsibilities for planning, management and the development of transport in the county. The vision of the plan is that by 2030 'transport in Cornwall will be excellent, with our transport system connecting people, communities, businesses and services in a way that is reliable, efficient, safe, inclusive and enjoyable'.
- 5.56. With reference to the Neighbourhood Plan area there is a higher proportion of people who walk to work than regionally or nationally, but there is still high reliance on the private car, which is likely to continue, because of the generally rural nature of area and its topography. Residents need to travel outside of the Plan area to access a wider range of services and facilities, including at Liskeard, Truro and Plymouth. However, although there are good public transport links to locations outside of Looe. A lower percentage of residents in the Neighbourhood Plan catch a train, bus, minibus or coach to work in comparison to the regional and national trends. Equally, the number of car-borne visitors to Looe is high and can be expected to be maintained, or possibly increase as a result of Brexit and Covid-19. This will continue to create seasonal congestion and contribute to green-house gas emissions. New development has the potential to increase traffic and lead to additional congestion issues within the Neighbourhood Plan area. This is particularly significant in the local context, due to the pressures from narrow roads, steep incline, vehicle type and the stop-start effect of congestion at certain periods.
- 5.57. In response to these considerations, Looe Neighbourhood Development Plan Policies H 1 to H 4 on housing aim to deliver new residential developments that are situated in the most sustainable locations in terms of the relative distance to local centres, supporting the creation of inclusive communities and encouraging alternative options of transportation for undertaking day-to-day activities. They also include provisions to ensure that footways, pavements, entrances and driveways do not get blocked or obstructed. Policy E 7 'Future Community Service Reserve' makes provision to release the opportunity to extend the platform of Looe station so that 3 or 4-carriage trains can be accommodated, which would meet the additional train capacity that is forecast for peak rail services in the longer-term.
- 5.58. Looe Neighbourhood Development Plan Policy T 1 'Traffic Sensitivity and Development' supports developments where the sensitivity of the local road network has been understood and measures have been included to ensure that issues such as congestion, obstruction, safety and air pollution are not aggravated and wherever possible are alleviated, It also states that development proposals of more than four dwellings should be supported by a non-motorised user (NMU) audit demonstrating how it supports sustainable travel and any supporting measures, such as footways links, traffic calming schemes and bus bays are incorporated.
- 5.59. To encourage modal change, Policy T 3 'Cycle Proofing' seeks to ensure that new development does not impact on cycle access, safety and convenience, This is supplemented by Policy T4 'Footpath and cycle path network' aims to improve and extend paths which link to local services and

¹⁴ Cornwall Council (2011): 'Connecting Cornwall: 2030 Strategy', [online] available via: <<https://www.cornwall.gov.uk/transport-and-streets/transport-policy/local-transport-plan-connecting-cornwall-2030/>>

facilities. designed and improved to be accessible to all including people with disabilities by applying the principle of ‘Least Restrictive Access’.

- 5.60. Although many transportation issues are beyond the remit of the Looe Neighbourhood Development Plan to control, it is nevertheless concluded that the submission version of the Neighbourhood Plan is likely to lead to **positive effects** in relation to the ‘Transportation’ SEA theme.

CONCLUSIONS AT THIS CURRENT STAGE

- 5.61. The assessment has concluded that the submission version of the Neighbourhood Plan is likely to lead to **significant positive effects** in relation to the ‘Climate Change’ SEA theme. This relates to the focus of the Neighbourhood Plan on tackling the local causes and impacts of global warming. However, this is dependent on the extent to which proposals incorporate mitigation and adaptation measures through design, along with the level of funding which is available to support schemes such as the Harbour project. The Neighbourhood Plan will also lead to **significant positive effects** in the ‘Population and Community’ SEA theme, from its policies for safeguarding and enhancing community infrastructure, facilitating the delivery of housing which meets local needs and through supporting economic vitality by enhancing the prospects for employment locally. The Neighbourhood Plan is also likely to lead to **significant positive effects** in relation to the ‘Landscape’ and ‘Historic Environment’ SEA themes. These benefits largely relate to the Neighbourhood Plan’s emphasis on protecting and enhancing the special qualities of the Town Centre and its Character Areas, supporting the quality of the public realm, and through incorporating high-quality and sensitive design through new development proposals.
- 5.62. The Neighbourhood Plan will also bring **positive effects** in relation to the ‘Health and Wellbeing’ SEA theme, linked to its promotion of improved and accessible network of footpaths, enhancements to green infrastructure and open space provision to encourage active lifestyles, and the facilitation of flexible and easily adaptable dwellings for all residents. Additionally, the Neighbourhood Plan will bring **positive effects** in relation to the ‘Biodiversity and Geodiversity’ SEA theme through retaining habitats, enhancing ecological networks and delivering net gain. However, given the approaches taken forward through the Neighbourhood Plan will help limit potential effects from
- 5.63. The Neighbourhood Plan will also have **positive effects** regarding the ‘Transportation’ SEA theme, given its focus on reducing traffic congestion, supporting a modal shift towards sustainable transport and by ensuring that new developments provide appropriate access to local services and facilities. Likewise, the Neighbourhood Plan will also bring **positive effects** for the ‘Land, Soil and Water Resources’ SEA theme through the implementation of objectives which seek to limit pollution and improve the environmental quality of the NDP area. However, these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.

6. WHAT ARE THE NEXT STEPS?

- 6.1. This Environmental Report accompanies the Looe Neighbourhood Plan for submission to the Local Planning Authority, Cornwall Council, for consultation and subsequent Independent Examination.
- 6.2. At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the current adopted Local Plan document for Cornwall.
- 6.3. If the Independent Examination is favourable subject to modifications recommended by the Examiner, any modifications made to the Plan will included and appraised in the final version of this SEA Environment Report to conform to the Basic Conditions, The Looe Neighbourhood Plan will then be subject to a referendum, organised by Cornwall Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be adopted. After it is adopted, the Looe Neighbourhood Development Plan will become part of the Development Plan for Looe NDP area.

CLIMATE CHANGE (INCLUDING DRAINAGE AND FLOOD RISK)

Context review

- A.1 Climate change represents a fundamental threat to global well-being, which is recognised internationally through the **Kyoto and Paris Climate Conference Agreements and the United Nations Intergovernmental Panel on Climate Change (IPCC) Interim Report, 2018**¹⁵. The UK Government has a commitment to reduce CO2 emissions by 50% on 1990 levels by 2025 and by 80% on 1990 levels by 2050. In May 2019, Parliament declared a 'climate change emergency'. In May 2019 the **Committee on Climate Change** recommended a 'net zero' greenhouse gas emissions target by 2050 and a new law mandating this is under discussion¹⁶.
- A.2 The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action in the next five years, see below¹⁷ :
- Flooding and coastal change risks to communities, businesses and infrastructure;
 - Risks to health, well-being and productivity from high temperatures;
 - Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
 - Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
 - Risks to domestic and international food production and trade; and
 - New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.
- A.3 **The UK Climate Change Act**¹⁸ was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.
- A.4 The Climate Change Act includes the following:
- **2050 Target.** The Act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels.
 - **Carbon Budgets.** The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving

¹⁵ https://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf

¹⁶ <https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf>

¹⁷ <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>

¹⁸ <http://www.legislation.gov.uk/ukpga/2008/27/contents>

the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.

- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.

A.5 The National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same¹⁹.

A.6 The Committee on Climate Change report listed the 'key pillars' of a net-zero economy, including a supply of low-carbon electricity (which will need to quadruple by 2050), efficient buildings and low-carbon heating (required throughout the UK's building stock), electric vehicles (which should be the only option from 2035 or earlier), developing carbon capture and storage technology.

A.7 **The National Planning Policy Framework (NPPF 2018) says:**

- One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon economy.' 'NPPF 2018 (Para 148) says that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to:
 - shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience;
 - encourage the reuse of existing resources, including the conversion of existing buildings; and
 - support renewable and low carbon energy and associated infrastructure.
- 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'
- 2.2 Para 152 of NPPF 2018 encourages planning support for community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.
- Direct development away from areas at highest risk of flooding (whether existing or future). 'Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.'

A.8 **The Flood and Water Management Act²⁰** highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;

¹⁹ <https://www.theccc.org.uk/tackling-climate-change/preparing-for-climate-change/uk-adaptation-policy/>

²⁰ <http://www.legislation.gov.uk/ukpga/2010/29/contents>

- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
 - Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
 - Creating sustainable drainage systems (SuDS).
- A.9 Further guidance is provided in the document ‘**Planning for SuDS**’²¹. This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of ‘contributing to local quality of life and green infrastructure’.
- A.10 **The Cornwall Local Plan: Strategic Policies.** Objective 9(a) and 9(d) within key theme number 4 states to ‘reduce energy consumption while increasing renewable and low carbon energy production’ and to ‘increase resilience to climate change’. In Policy 2 it says that development should assist the creation of resilient and cohesive communities by: a. Delivering renewable and low carbon energies, increasing energy efficiency and minimising resource consumption through a range of renewable and low carbon technologies;....g. Supporting smart specialisation sectors including; food; aerospace; marine; renewable energies (including geothermal); and cultural industries’
- A.11 Policy 14 strongly supports the development of proposals that will increase use of and production of renewable and low carbon energy. It adds that in the case of wind turbines, they are within an area allocated by Neighbourhood Plans for wind power and avoid, or adequately mitigate shadow flicker, noise and adverse impact on air traffic operations, radar and air navigational installations. It also says that ‘In and within the setting of Areas of Outstanding Natural Beauty and undeveloped coast, developments will only be permitted in exceptional circumstances and should generally be very small scale in order that the natural beauty of these areas may be conserved. When considering proposals for renewables that impact upon the Area of Outstanding Natural Beauty and its setting and / or the World Heritage Site or other historic assets and their settings, applicants should apply other relevant policies in the Plan’.
- A.12 The following also directly relate to Climate Change:
- Policy 14: Renewable and low carbon energy;
 - Policy 15: Safeguarding renewable energy;
 - Policy 25: Green infrastructure; and
 - Policy 26: Flood risk management and coastal change
- A.13 The lower case text in CLP says that ‘Proposals within the AONB, or those that would affect its setting will be supported where they are small scale and meet an identified local need, where landscape capacity can be demonstrated and the natural beauty of the AONB can be conserved and enhanced in accordance with Policy 23’.

Summary of Current Baseline

Contribution to Climate Change

- A.14 In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change suggests that Cornwall has broadly similar per capita emissions in

²¹ http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx

comparison to the South West of England and England as a whole since 2005 (see Table 4.1). Cornwall has also seen a 36.3% reduction in the percentage of total emissions per capita between 2005 and 2016, slightly lower than the reductions for the South West of England (36.7%) and England (37.6%).

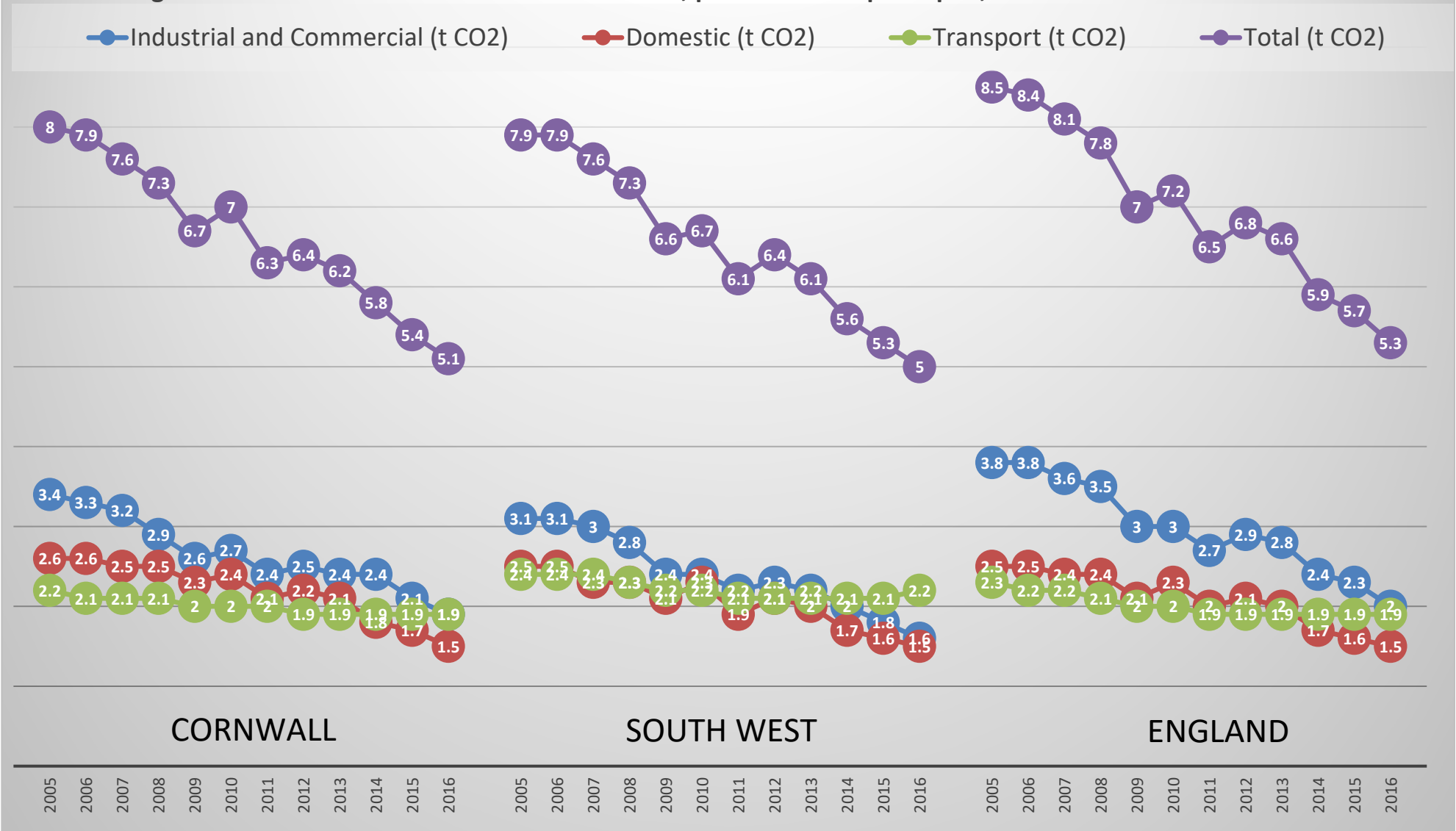
Potential effects of Climate Change

- A.15 The outcome of research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18) team²². UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.
- A.16 As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile) for South West England during the period 2040-2059 compared to the period 1981-2000 are likely to be as follows²³:
- The central estimate of increase in annual mean temperatures of between 2°C and 3°C;
 - The central estimate of change in annual mean precipitation of +10 to +20% in winter and - 20% to -30% in summer.

²² <http://ukclimateprojections.metoffice.gov.uk/>

²³ <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/land-projection-maps>

Figure 12: Carbon dioxide emissions and sources, plus emissions per capita, 2005-2016



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

A.17 Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area, including:

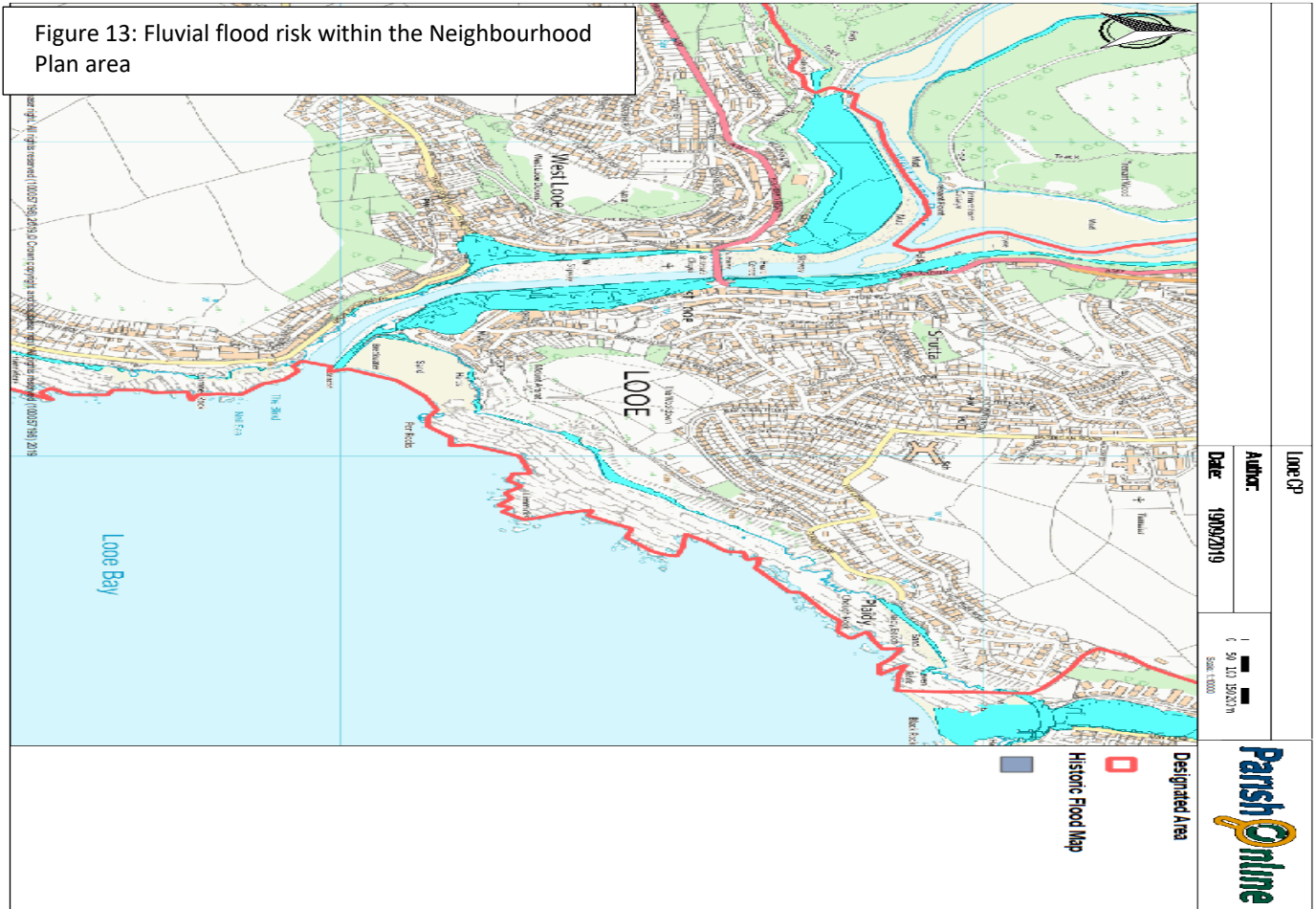
- Increased incidence of heat related illnesses and deaths during the summer;
- Increased incidence of illnesses and deaths related to exposure to sunlight (e.g. skin cancer, cataracts);
- Increased incidence of pathogen related diseases (e.g. legionella and salmonella);
- Increase in health problems related to rise in local ozone levels during summer;
- Increased risk of injuries and deaths due to increased number of storm events;
- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100 year floods;
- Changes in insurance provisions for flood damage;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Deterioration in working conditions due to increased temperatures;
- Changes to global supply chain;
- Increased difficulty of food preparation, handling and storage due to higher temperatures;
- An increased move by the insurance industry towards a more risk-based approach to insurance underwriting, leading to higher cost premiums for business;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

Flood Risk

A.18 Looe is affected by tidal, fluvial and surface water flooding, all of which is exacerbated by global warming impacts: Global warming is bringing with it rising sea-levels and aggressive storms, which are likely to increase in intensity, leading to frequent serious flooding within the harbour and town centre, harming its fabric and form, and extending coastal erosion nearby. Heavy and prolonged rainfall, historically a cause of land instability, is likely to worsen. This, combined with many years of poor waste-water management in the wider river catchment, has put bathing water quality at risk.

A.19 The areas at highest risk of tidal/fluvial flooding in the Neighbourhood Plan area are those near the Looe Rivers which are in Flood Zone 3 adjoining the functional floodplain (3B). Flood Zone 3 is of a high probability of flooding; representing that there is a 1% (1 in 100) or greater chance of flooding happening each year. This is at its greatest when there is a combination of heavy rainfall and high tides, supplemented by storm surge.

- A.20 Most of the current Flood Zone 3 will fall within the medium risk tidal extreme resulting from projected sea level rise in the 50 and 100 year periods.
- A.21 East and West Looe have been assessed through Cornwall's Shoreline Management Plan (SMP2) as facing a considerable level of risk from tidal flooding, which will grow worse through predicted future sea level rises, with over 300 commercial and residential properties effected. Much of the area at risk is a Conservation Area and there are many listed buildings present, including the quay structures themselves. The Banjo Pier and East Looe Beach are critical elements of the defence system at Looe. The nature of flooding at Looe, which aside from quay overtopping includes quay wall permeability, drainage back-up and possible wave overtopping in extreme storm conditions. Lesser flood and erosion risks exist for Plaidy, Hannafore and the area between Hannafore and Polperro Parish. The upper reaches of the tidally influenced parts of the East and West Looe Rivers are at risk from flooding beyond the mean high-water mark under the 1:200 year flood scenario, potentially threatening some local road infrastructure and residential property.
- A.22 There has been £39m in damages in last 5 years and 2,5ha of the town centre is at risk from flooding. Key infrastructure that lies in the flood zone includes :
- GP Surgery
 - Railway Station
 - 2 miles of railway line (142 incidents to date)
 - Fire station (the fire engine has to be moved to the top of the hill in flood events)
 - Main bridge approach
 - Main food stores
 - Bank
 - Fish market (which accounts for 10% of landings in Cornwall)
- A.23 65% of business in the town have experienced flooding, and 22% have considered their long-term future as a result. The average cost per event per business is £31,000.
- A.24 Without action, the current flooding area (2.5 ha) could extend to cover 16ha in the future, regularly inundating the town centre, the harbour, key community service sites and transport links, with the frequency of flooding increasing six-fold.
- A.25 The SMP2 says that the Local Plan and Neighbourhood Plan 'should include policies to support the adaptation of Looe against rising sea levels due to climate change. This may require changes to land use type as well as improved community resistance and resilience measures.
- A.26 Figure 13 displays the flood risk areas present in the Neighbourhood Plan area.



- A.27 The dependency of the settlement of Looe on the sea and the Looe River is absolutely fundamental. The town owes its founding to the sea and river and continues to draw its economic, social and environmental well-being from them. The principal asset of the town is this fine location, springing from which are all the physical and social characteristics that make Looe a classic Cornish coastal settlement: fishing harbour, pier, beach, railway branch-line, narrow streets with a huddle of quaint cottages. It has also shaped the pattern of local jobs and skills and contributed to the excellent image of Cornwall far and wide.
- A.28 Flooding and associated decline in bathing water quality are therefore major challenges to the future prosperity of Looe and the well-being of its community.



Figure 14: Surface water flood risk within the Neighbourhood Plan area

Summary of Future Baseline

- A.29 Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer, and more intensive storms. This is likely to substantially increase the risks associated with climate change, with an increased need for resilience and adaptation.
- A.30 In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric

cars. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions. There is also a need to increase renewable energy development in Cornwall, which local and neighbourhood planning can contribute to delivering.

Key Sustainability Issues

- A.31 Any increases in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions in the Looe NDP area.
- A.32 The total CO2 emissions per capita within Cornwall are broadly similar to the regional and national totals and the overall percentage reduction of emissions within the Neighbourhood Plan area between 2005 and 2016 was slightly less than regional and national totals.
- A.33 The raised risk of fluvial, tidal and surface water run-off contributed to by global warming, and its effect on flooding, land instability, coastal erosion and bathing water quality poses a serious threat to community safety, the fabric and form of the town, and its future prosperity.
- A.34 The Looe Neighbourhood Plan should seek to increase the resilience of the Neighbourhood Plan area to the effects of climate change by supporting and encouraging adaptation strategies.

Context review

- A.35 **The EU Biodiversity Strategy (May 2011)**²⁴ sets a Europe-wide target to ‘halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020’.
- A.36 Under European patronage, a network of core breeding and nesting sites for rare and threatened species, and some rare natural habitat types which are protected in their own right, has been established under the title Natura 2000. It stretches across all 28 EU countries, both on land and at sea. The aim of the network is to ensure the long-term survival of Europe's most valuable and threatened species and habitats, listed under both the Birds Directive and the Habitats Directive. It specifically includes sites designated as Special Areas of Conservation (SAC) and Special Protected Areas (SPA).
- A.37 **The National Planning Policy Framework (NPPF 2018)** says in Para 8 that one of the three overarching objectives of sustainable development is to ‘contribute to protecting and enhancing our natural, built and historic environment’ including ‘helping to improve biodiversity, using natural resources prudently, (and) minimising waste and pollution...’
- A.38 It goes on to add that:
- *‘Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.’ (Para 170; (a) and (d))*
 - *‘Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value[...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries’’ (Para 171).*
 - *‘To protect and enhance biodiversity and geodiversity, plans should:*
 - a) *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
 - b) *Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity’(Para 174).*
- A.39 **‘Biodiversity 2020: A strategy for England’s wildlife and ecosystem services’**²⁵ aims to ‘halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people’.

²⁴ http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf

²⁵ <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

- A.40 **The Natural Environment White Paper 2012**²⁶ says that a healthy, properly functioning natural environment is the foundation of sustained economic growth, and a vital support for our well-being and security. The White Paper is intended to halt and reverse the decline in biodiversity and signaled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a wider and more inclusive approach at ‘a landscape scale’ to protecting and enhancing biodiversity. It also aims to create a ‘green economy’ in which economic growth and the health of natural resources sustain each other and markets, business and Government better understand and reflect the value of nature. It includes commitments to:
- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
 - Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
 - Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
 - Address barriers to using green infrastructure to promote sustainable growth.
- A.41 ‘**A Green Future: Our 25 Year Plan to Improve the Environment**’²⁷ the Government’s 25 Year Environment Plan, includes policies within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’ and Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ which directly relate to the Biodiversity and Geodiversity SEA theme.
- A.42 The 25 Year Environment Plan sets out the Government’s environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to *‘tackle the growing problems of waste and soil degradation...improve social justice by tackling the pollution suffered by those living in less favourable areas.... and by opening up the mental and physical health benefits of the natural world to people from the widest possible range of ages and backgrounds’*. It also sets out how the Government will address the effects of climate change - *‘still perhaps the most serious long-term risk to the environment given higher land and sea temperatures, rising sea levels, extreme weather patterns and ocean acidification, which harms marine species.’* These aims are supported by a range of policies which are focused on the following six key areas:
- Using and managing land sustainably;
 - Recovering nature and enhancing the beauty of landscapes;
 - Connecting people with the environment to improve health and wellbeing;
 - Increasing resource efficiency, and reducing pollution and waste;
 - Securing clean, productive and biologically diverse seas and oceans; and
 - Protecting and improving the global environment. (Executive Summary, P9 and 10)
- A.43 In this context, Goal 3 ‘Thriving plants and wildlife’ and the policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’ and Chapter 5 ‘Securing clean, productive and biologically diverse seas and oceans’ directly relate to the Biodiversity and Geodiversity SEA theme.
- A.44 **The Cornwall Local Plan: Strategic Policies 2010-2030** says that Objective 10(b) within key theme number 4 is to ‘maintain and enhance an effective network of open space and environmental stewardship for our ecosystem services network for wildlife’.
- A.45 Policy 22 ‘European Protected Sites - mitigation of recreational impacts from development’ proposes that *‘for residential development and student and tourist accommodation, mitigation measures for recreational impacts on European Sites will be required where*

²⁶ <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>

²⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

development is proposed within the identified zones of influence around those European Sites that are vulnerable to adverse recreational impacts'. Such mitigation is to comprise on site access and management, and off site provision of suitable alternative recreational facilities, subject to guidance given in a European Sites Mitigation Strategy Supplementary Planning Document.

- A.46 Policy 23 'Natural Environment' directly relate to Biodiversity and Geodiversity, aiming to protect such assets and achieve a net gain for biodiversity.
- A.47 **The Cornwall Biodiversity Action Plan** is presented in 4 volumes:
- Cornwall's Biodiversity Volume 1: Audits and Priorities
 - Cornwall's Biodiversity Volume 2: Action Plan
 - Cornwall's Biodiversity Volume 3: Action Plans 2004
 - Cornwall's Biodiversity Volume 4: Priority Projects 2010-2015
- A.48 '**Cornwall's Biodiversity Volume 1: Audits and Priorities** set recommendations for Action Plans, which were produced for the Cornish priority habitats and species and published in 'Cornwall's Biodiversity Volume 2: Action Plans'. A further volume, 'Cornwall's Biodiversity Volume 3: Action Plans 2004' was produced in line with the UK Biodiversity Action Plan (UK BAP) process, highlighting the 25 UK BAP priority habitats and 127 BAP priority species occurring in Cornwall. In light of a progress review, Cornwall's BAP was reviewed and updated, taking into consideration the new UK list of priority habitats and species, and the England Biodiversity Strategy (EBS) delivery framework. This document 'Volume4: Priority Habitats' 2010 identifies priority project areas. Looe is within the 'Coast to Coast' Priority Plan area.

Summary of Current Baseline

- A.49 The Looe NDP Area is within the 'Zone of Influence' for the Plymouth Sounds and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA). It is also within the Impact Risk Zones for two SSSIs to the west in Lansallos Parish. The Whitsand and Looe Bay Marine Conservation Zone overlaps with the NDP area at the coastal margin, but is heavily influenced by flood protection, land drainage and planning and development management within the NDP area and beyond it in adjoining areas.
- A.50 Six County Wildlife Sites, mainly comprising deciduous woodlands, are present in or overlap with the Looe NDP area. All these sites also feature Biodiversity Action Plan (BAP) Priority Habitats. Two large areas of Ancient Woodland are within or overlap with the NDP area, both contributing significantly to local biodiversity and landscape character. One of these areas, Kilminorth Wood is also a Local Nature Reserve.
- A.51 Additionally, the Neighbourhood Plan area contains a variety of Biodiversity Action Plan (BAP) Priority Habitats and Species, discussed below.
- A.52 The National Forestry Inventory indicates that on its approaches the NDP area is well 'wooded' although the area itself is fairly sparsely covered.

EUROPEAN AND NATIONALLY DESIGNATED SITES

Plymouth Sound and Estuaries SAC and Tamar Estuaries Complex SPA

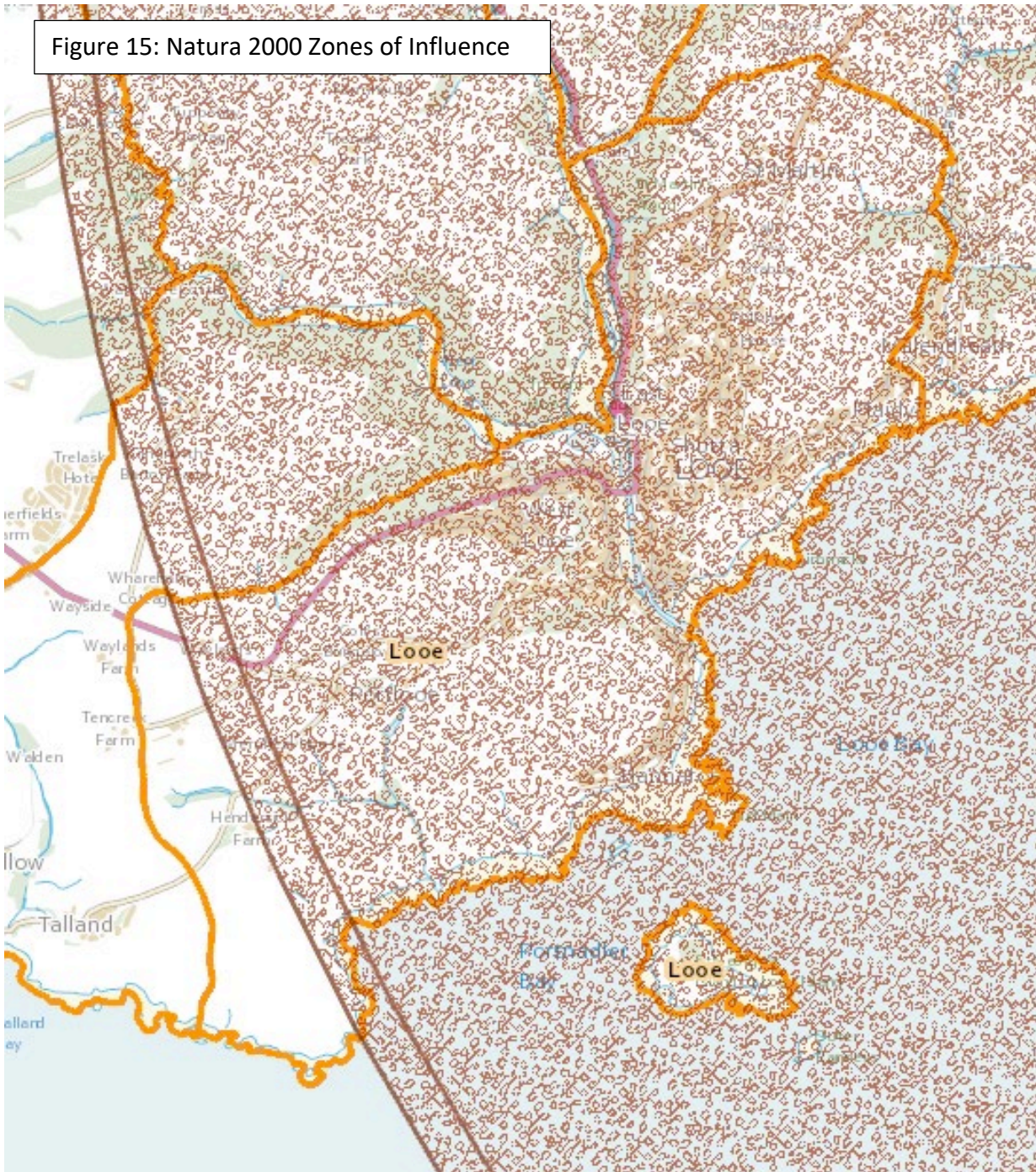
- A.53 Although not covered by or contiguous with the regional Natura 2000 network sites of the Tamar Estuary and Plymouth Sound, most of the Looe NDP Designated Area is within the Plymouth Sounds and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA) 'Zone of Influence' defined for the purposes of Policy 22 of the Cornwall Local Plan (See Figure 15 below).

- A.54 The Tamar Estuaries Complex SPA²⁸ is composed of extensive intertidal mudflat communities, areas of mixed muddy sediment communities and saltmarsh communities. These habitats provide important feeding and roosting areas for over wintering avocet (*Recurvirostra avosetta*) and little egret (*Egretta garzetta*). The mudflats support high densities and variety of invertebrates, a vital food source for birds. The site is of particular importance for shelduck (*Tadorna tadorna*), whimbrel (*Numenius phaeopus*), greenshank (*Tringa nebularia*) and Mediterranean gull (*Ichthyaetus melanocephalus*). Other notable species supported by the site include dunlin (*Calidris alpina*), curlew (*Numenius arquata*), black-tailed godwit (*Limosa limosa*) and redshank (*Tringa totanus*).
- A.55 Plymouth Sound and Estuaries SAC²⁹ covers an area of 6,386 ha and contains a rich biodiversity, including five habitats and one species that are a primary reason for the selection of the site:
- Sandbanks which are slightly covered by sea water at all time;
 - Estuaries;
 - Large shallow inlets and bays;
 - Reefs;
 - Atlantic salt meadows (*Glauco-Puccinellietalia maritima*); and
 - Shore dock (*Rumex rupestris*)
- A.56 It is also the only known spawning site for the Allis shad (*Alosa alosa*).

²⁸ <https://bit.ly/2qSLvVS>

²⁹ <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013111>

Figure 15: Natura 2000 Zones of Influence



Talland Barton Farm SSSI

A.57 The Talland Barton Farm SSSI a nationally important site for a population of the ‘many-fruited beardless-moss *Weissia multicapsularis*, a critically endangered species known from only two sites globally, and for its assemblage of nationally rare and nationally scarce bryophytes’³⁰.

A.58 The site is not in the Looe NDP Designated Area but is located some 650m from it (see Figure 16) so the NDP area falls within the Impact Risk Zone for this site. SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location, including residential, rural-residential and rural non-residential. Natural England is a statutory consultee on development proposals that might impact on SSSIs. The whole of the Neighbourhood Plan area is within this SSSI IRZ for the types of development likely to have risks for the SSSI:

³⁰ <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/2000668.pdf>

- residential of 100 units or more;
- any residential development of 100 or more houses outside existing settlements /urban areas;
- livestock & poultry units with floorspace > 500m², slurry lagoons > 750m² & manure stores > 3500t.
- General combustion processes >50MW energy input. Including energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis / gasification, anaerobic digestion, sewage treatment works, other incineration / combustion.

Polyne Quarry SSSI

- A.59 The Polyne Quarry SSSI a nationally important site as ‘the best inland exposure of fossiliferous horizons of the Lower Devonian Meadfoot Group in Cornwall. This locality has yielded a rich and varied fauna in a characteristic lithology of brown shales, which contrasts with more sandy horizons exposed around Looe. The fauna from this locality is of considerable importance in establishing a Siegenian age for the Meadfoot Group in this region’³¹.
- A.60 The site is not in the Looe NDP Designated Area but is located some 620m from it (See Figure 16), so the NDP area falls within the Impact Risk Zone for this site. However this is a very small area in the extreme south and west of the area. The notifiable development activities in this area of the IRZ for the SSSI include infrastructure development, quarries, large residential and other developments, large agricultural developments, landfill, large scale composting and non-sewered water or liquid waste discharges.

Whitsand and Looe Bay Marine Conservation Zone

A.61 The Whitsand and Looe Bay Marine Conservation Zone (See Figure 16) covers 52 km² and is runs along the south coast of Cornwall from Hore Stone eastwards to Queener Point on the Rame³². MCZs, are intended to form the UK contribution to an international network of protected sites in the north east Atlantic. This site became a Marine Conservation Zone (MCZ) in November 2013 and was updated in May 2019. Designation of this site as a Marine Conservation Zone protects the following features:

- Giant goby (*Gobius cobitis*)
- High energy intertidal rock
- Intertidal coarse sediment
- Intertidal sand and muddy sand
- Low energy intertidal rock
- Moderate energy intertidal rock
- Ocean quahog (*Arctica islandica*)
- Seagrass beds
- Stalked jellyfish (*Calvadosia campanulata*)
- Stalked jellyfish (*Calvadosia cruxmelitensis*)
- Stalked jellyfish (*Haliclystus species*)
- Subtidal coarse sediment
- Subtidal sand
- Moderate energy circalittoral rock

³¹ <https://bit.ly/33PyTgT>

³² <https://bit.ly/2CP2z1y>

- Recover to a favourable condition
- Pink sea-fan (*Eunicella verrucosa*)
- Sea-fan anemone (*Amphianthus dohrnii*)

A.62 The interest in these features is because of their conservation importance:

- The sediment supports populations of bivalve molluscs and marine worms and provides a habitat for commercially important fish and shellfish, while the site's intertidal rocky habitats are characterised by animals such as sponges, sea squirts and the rare giant goby, a fish which lives in rockpools. The intertidal rocky habitats at Hannafore and on Looe Island are particularly special, supporting a high diversity of seaweeds and invertebrates. These rocky habitats also support commercially important crustacean species, such as the common lobster and crab.
- The ocean quahog, a bivalve mollusc which is known to live for over 400 years has been recorded within sediment habitats in the site. Within the shallower part of the site the seagrass beds are likely to provide a nursery ground for ecologically and commercially important species such as cuttlefish.
- Further out to sea there are shipwrecks and small areas of subtidal rocky reef that support pink sea-fans and rare sea-fan anemones. The pink sea-fan is an extremely slow-growing soft coral which attaches to hard substrates such as subtidal rocky reefs and wrecks. Many species can be found living on or around the pink sea-fan structures including the sea-fan anemone, which is also protected within this site.
- The sea-fan anemone only reaches around 1 cm in diameter. Its disc-like body is fringed by up to 80 short tentacles that are pink, orange or red in colour and usually streaked or splashed with white. The sea-fan anemone does not usually attach directly to the seabed but instead lives with its base wrapped around a host organism, usually a pink sea-fan. Both the pink sea-fan and the sea-fan anemone are particularly vulnerable to damage.
- Stalked jellyfish are also present within the site. These animals are very small and typically spend their life attached to either seaweed or seagrass. They use the stinging tentacles on the tips of their eight webbed arms to kill or paralyse prey and for defence.

A.63 Issues which might impact on the MCZ and on which the NDP can have influence include coastal recreation, public rights of way (including the English Coastal Path), tourism, economic regeneration, flood protection, land drainage and planning and development on coasts and estuaries, including aquaculture in the intertidal zone.

A.64 The flood protection, land drainage and planning and development aspect is likely to be of significant influence on the health of the habitat and species within the MCZ, mainly from the off-site impacts of such activity, but also from development within or immediately abutting the intertidal area.

LOCALLY IMPORTANT SITES

County Wildlife Sites

A.65 County Wildlife Sites (CWS) are the most significant areas of semi-natural habitat in Cornwall outside of statutory protected sites such as SACs and SSSIs. CWS range from small copses and linear features like river valleys, to ancient woodlands, large moors and wetlands. Many of these are Biodiversity Action Plan (BAP) habitats i.e. habitats which are considered of conservation significance either locally or nationally.

A.66 In the Looe NDP Designated Area County Wildlife Sites are as follows:

- Talland Bay to Hendersick Point CN3.6³³
- West Looe to Watergate CN12.1³⁴
- East Looe West Bank - Trenant Point to Tregarland Wood CN1.6³⁵
- St Martins to Cleese Wood CN1.3³⁶
- Bodigga Cliff CN3.4³⁷
- Looe Island CN3.5³⁸

Ancient Woodland

A.67 Ancient woodland is any woodland area that's been wooded continuously since at least 1600 AD so that it has evolved into complex communities. It includes:

- ancient semi-natural woodland mainly made up of trees and shrubs native to the site, usually arising from natural regeneration;
- plantations on ancient woodland sites - replanted with conifer or broadleaved trees that retain ancient woodland features, such as undisturbed soil, plants, fungi, microorganisms and insects.

A.68 The NPPF 2-018 says that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland....) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

A.69 Ancient Woodlands in there Looe NDP Designated Area include:

- St Martins Wood
- Kilminorth Woods (Mostly in adjoining Lansallos Parish but abutting hard up to the Looe NDP Designated Area)

Local Nature Reserves

A.70 Local Nature Reserves (LNRs) may be established by Local Authorities in consultation with English Nature under Section 21 of the National Parks and Access to the Countryside Act 1949 and are habitats of local importance.

A.71 Located directly to the north and west of the Neighbourhood Plan area, Kilminorth Woods LNR covers an area of 45.03 ha and was designated in November 1993. Natural England states that Kilminorth Woods is an area of 'ancient semi-natural woodlands along the western bank of the tidal reaches of West Looe River. Western oak woodland on valley sides including sessile oak, birch, beech, sweet chestnut and sycamore. Parts of the wood were formerly coppiced. The reserve is known for its lichens, mosses and ferns. Good for birds in the woods and on the estuary including kingfishers, curlew and little egret³⁹'.

Priority Habitats

A.72 There are a variety of BAP Priority Habitats located within and/or adjacent to the Neighbourhood Plan area (See Figure 16), predominantly areas of Deciduous Woodland. However, there are also areas of :

- Marine Cliffs and Slopes

³³ <https://intranet.cornwallwildlifetrust.org.uk/sites1/sheets/default.aspx?oid=125-cws>

³⁴ <https://intranet.cornwallwildlifetrust.org.uk/sites1/sheets/default.aspx?oid=95-cws>

³⁵ <https://intranet.cornwallwildlifetrust.org.uk/sites1/sheets/default.aspx?oid=82-cws>

³⁶ <https://intranet.cornwallwildlifetrust.org.uk/sites1/sheets/default.aspx?oid=79-cws>

³⁷ <https://intranet.cornwallwildlifetrust.org.uk/sites1/sheets/default.aspx?oid=123-cws>

³⁸ <https://intranet.cornwallwildlifetrust.org.uk/sites1/sheets/default.aspx?oid=124-cws>

³⁹ <https://bit.ly/2QmbXSI>

- Upland Oakwood
- Upland Mixed Ashwoods
- Intertidal
- Intertidal Substrate Foreshore (Sand, Mud and Gravel, Rock Platforms, Boulders)
- Coastal Saltmarsh
- Coastal Vegetated Shingle
- Good quality semi-improved grassland

A.73 Figure 16 below shows the designated wildlife sites and BAP priority habitats located within and adjacent to the Neighbourhood Plan area.

National Forest Inventory

A.74 The National Forest Inventory (NFI) (See Figure 17) is a rolling programme designed to provide accurate information about the size, distribution, composition and condition of our forests and woodlands and also about the changes taking place in the woodlands through time. It is essential for developing and monitoring the policies and guidance that support the sustainable management of woodland.

A.75 Although it affords no protection to the sites identified (although they may be protected through other designations it is a useful tool in establishing the current baseline situation. The current map indicates that the NDP area is approached from the north through steep river valleys which host considerable areas of woodland. However, elsewhere the NDP area is sparsely covered, featuring many coastal cliff tops where tree growth is naturally limited, but also several steep valleys where woodlands may have been lost.

Summary of Future Baseline

A.76 Pressures for future development will undoubtedly generate additional pressures on habitats and species in the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network, particularly the marine environment. This may be exacerbated if the control of new development is not scrupulous about drainage methods. The potential loss of habitats and impacts on biodiversity networks may be exacerbated by the effects of climate change. In addition to the impact of changes in the patterns of drainage which may result from increased and heavier rainfall, climate change could lead damaging changes in the habitat available for existing species, and the development of modified or even new habitats. Consequently, the distribution and abundance of species may be changed, and potentially the migration of species from elsewhere may be encouraged, leading to competition with native species.

A.77 Maintaining and improving the condition of biodiversity in the future will require not only the protection and enhancement of important habitats but also the connections between them to ensure that biodiversity networks continue to be available. This will require the effective coordination of the delivery of housing, employment and infrastructure to protect and improve green infrastructure and ecological corridors which link with in initiatives being taken outside the NDP area.

A.78 The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth.

Key Sustainability Issues

- A.79 The Whitsand and Looe Bay Marine Conservation Zone is located partly within and adjacent to the Neighbourhood Plan area, with the integrity of the site threatened by coastal recreation, public rights of way (including the South West Coast Path), tourism, economic regeneration, flood protection, land drainage and planning and development
- A.80 There are some nationally protected sites close to the Neighbourhood Plan area. These include Polyne Quarry SSSI and Talland Barton Farm SSSI. Their Impact Risk Zones indicate that depending on scale, residential, rural residential and rural non-residential developments could have an impact.
- A.81 At the local level, Kilminorth Local Nature Reserve (LNR) and six County Wildlife Sites (CWS) are also located within or overlap with the Neighbourhood Plan area, containing a variety of BAP Priority Habitats
- A.82 Several other extensive areas of BAP Priority Habitat are located within or overlapping with the Neighbourhood Plan area, predominantly areas of deciduous woodland.

MAGiC Figure 16: Designated Wildlife and BAP Habitats Looe NDP Area

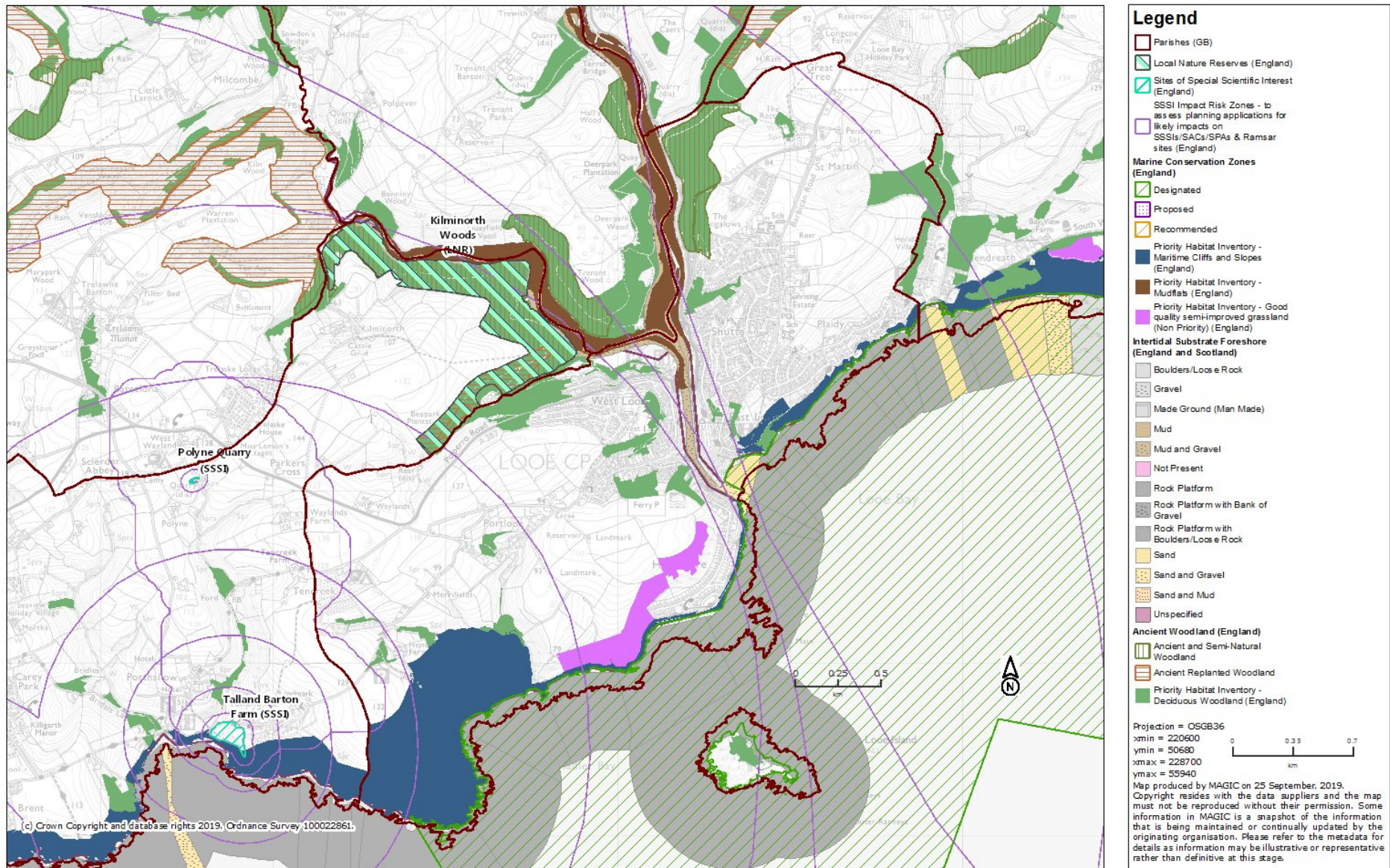
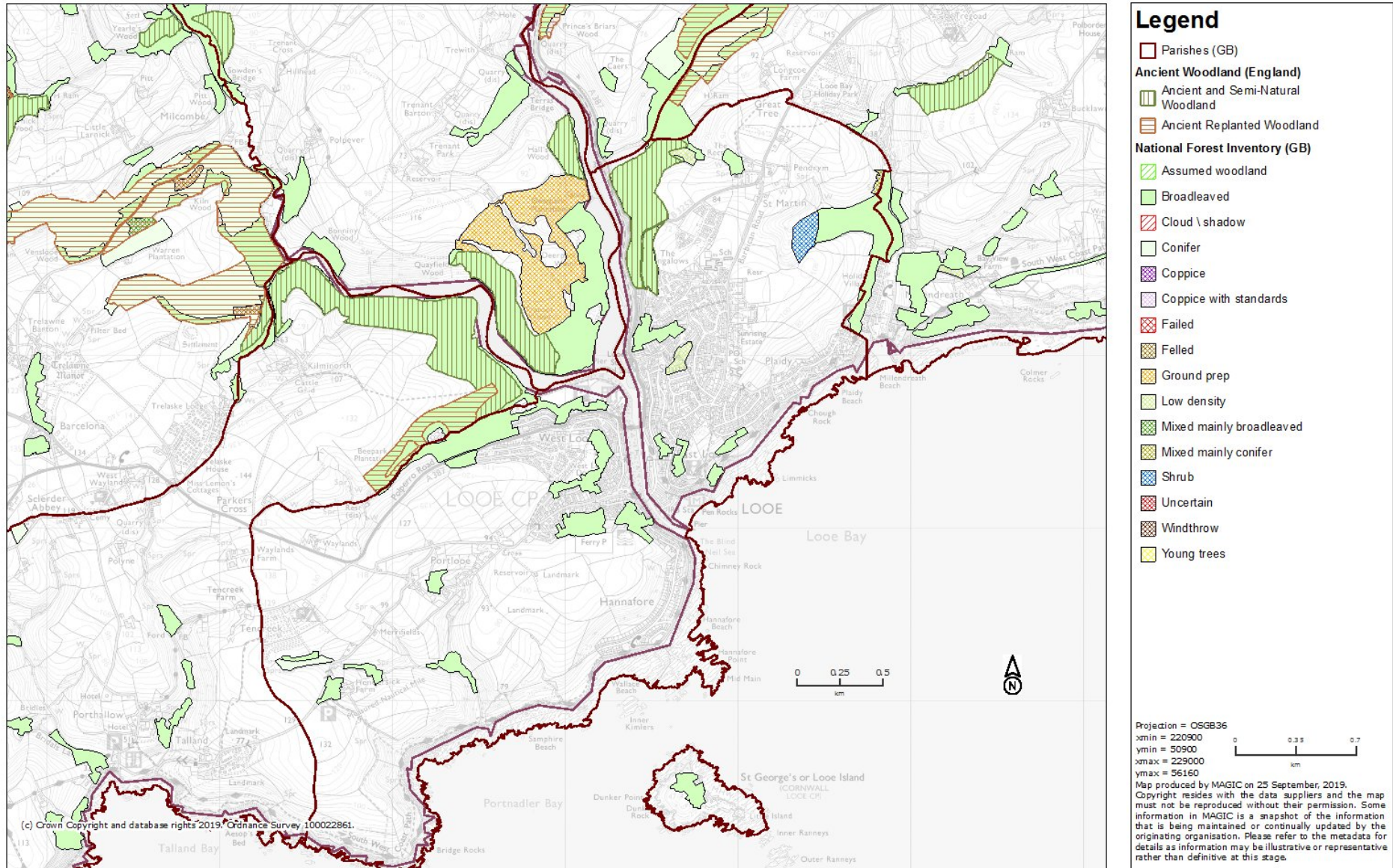


Figure 17: National Forest Inventory Looe Area



Context review

A.83 National Planning Policy Framework (NPPF 2018) key messages include:

- *‘Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.’*
- Strategic policies should set out an overall strategy making provision for *‘conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.’*
- Planning policies and decisions should ensure that developments *‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).’*
- *‘Planning policies and decisions should contribute to and enhance the natural and local environment by:*
 - *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils*
 - *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and*
 - *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.’*

A.84 **‘A Green Future: Our 25 Year Plan to Improve the Environment’**⁴⁰ the Government’s 25 Year Environment Plan, includes policies within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’ and Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ which directly relate to the Landscape SEA theme.

A.85 **The Cornwall AONB Management Plan 2016 to 2021**⁴¹ sets out the following 20-year vision for the AONB:

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

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

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

A.86 More specifically, the Management Plan identifies two strategic themes for actions to be pursued by the AONB Partnership. These strategic themes are:

⁴⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

⁴¹ <https://www.cornwall-aonb.gov.uk/management-plan>

PLACE:

1. Cultivating character
2. Managing development
3. Investing in nature
4. Responding to climate change
5. Nurturing heritage
6. Revitalising access

PEOPLE:

7. Vibrant communities
8. Health and happiness
9. Inspiring culture

A.87 The Management Plan breaks these actions down into key priorities in short medium and long term. A key short-term action of the Plan is:

‘Encourage and support the production of neighbourhood plans within the AONB, supported by detailed evidence based on landscape character, natural capital, historic environment, climate change adaptation and biodiversity’.

A.88 **The Cornwall Local Plan: Strategic Policies 2010-2030.** Objective 10(a) within key theme number 4 states to *‘respect the distinctive character of Cornwall’s diverse landscapes’.*

A.89 Policy 2 - Spatial Strategy states that new development should ‘maintain and respect the special character of Cornwall, recognising that all urban and rural landscapes, designated and undesignated, are important’... by identifying ‘the value and sensitivity, of the character and importance of landscapes, biodiversity and geodiversity and historic assets’

A.90 Policy 23 - Natural Environment - states that development proposals should sustain local distinctiveness and character and protect and enhance Cornwall’s natural environment where development should be of

2. ‘of an appropriate scale, mass and design that recognises and respects landscape character of both designated and undesignated landscapes... must take into account and respect the sensitivity and capacity of the landscape asset, considering cumulative impact and the wish to maintain dark skies and tranquillity in areas that are relatively undisturbed, using guidance from the Cornwall Landscape Character Assessment and supported by the descriptions of Areas of Great Landscape Value.

2(b) ‘Development within the Heritage Coast and / or Areas of Great Landscape Value should maintain the character and distinctive landscape qualities of such areas’

A.91 The policy also refers to the AONB, to the effect that:

‘great weight will be given to conserving the landscape and scenic beauty within or affecting the setting of the AONB. Proposals must conserve and enhance the landscape character and natural beauty of the AONB and provide only for an identified local need and be appropriately located to address the AONB’s sensitivity and capacity’.

A.92 Areas of Great Landscape Value are areas of high landscape quality with strong and distinctive characteristics which make them particularly sensitive to development. Within AGLVs the primary objective is conservation and enhancement of their landscape quality and individual character.

A.93 The following policies also directly relate to the Landscape and Historic Environment.

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

A.94 The following former Caradon District Local Plan policy is also carried forward to the Cornwall Local Plan:

*Policy CL9: Areas of Great Landscape Value (saved from the Caradon Local Plan)
Proposed development in the Areas of Great Landscape Value identified on the Proposals Map will not be permitted if it would materially harm the character of the particular*

area and if it does not closely reflect the traditional building styles and local materials, or the characteristic pattern of settlement, in the particular area.

Summary of Current Baseline

NATIONAL DESIGNATIONS

Cornwall AONB

- A.95 The westernmost third of the Looe NDP designated area is within the Cornwall AONB.. The AONB is managed by a Partnership Committee, made up of local and national organisations, and community representatives.
- A.96 The Looe NDP area within the AONB is part of area no. 10, 'South Coast Eastern - Polperro Coast', as illustrated on Figure 18 below. The AONB Management Plan 2016 - 2021⁴² describes this section of the Polperro Coast as follows:
- 'Much of the open land on the ridges is generally in excess of 100 metres and is dissected by short coastal streams emerging at Port Nadler. Due to the exposed nature of this coastal landscape there are few trees.... The cliffs are distinctive for their chamfered profile, covered in scrub, and a wide range of rough vegetation intermixed with wildflowers and grasses, providing important habitats for a range of wildlife.... Much of the land along this section of the AONB is in agricultural use with a mix of arable and pastoral farming in a medieval field enclosure system with medium sized fields. The narrow lane network connecting the farms with small hamlets are enclosed by high Cornish hedges of slate which are well vegetated and give the appearance of grassy banks'*
- A.97 The Statement of Significance within the Management Plan describes the landscape in detail, and from this flows a set of local policies, the greatest relevance for the Looe NDP being SCE 10.08 and SCE 10.09 which state:
- SCE10.08 - Support the management and extension of sessile oak woodlands at the local valleys at Portlooe. Consider opportunities for planting of local provenance native tree species such as sessile oak, hazel and alder to act as a future seed source for native woodland establishment where this is currently absent or sparse to assist appropriate subsequent natural regeneration.*
- SCE 10.09 - Seek a reduction in landscape and visual impacts of tourism including better integration of holiday sites, visitor infrastructure, car parks and signage....*

National Character Areas

- A.98 National Character Areas (NCAs) are landscape areas with similar characteristics, following natural lines in the landscape rather than administrative boundaries. NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to its character. The Looe NDP Designated Area falls within *NCA 152: Cornish Killas*⁴³. The NCA is broad but provides some context to the character of the Plan area, with the following characteristics from the NCA profile particularly relevant:
- Intimate coves and deep, steep-sided rias (drowned valleys) with broadleaved woodland down to the tidal edge.
 - Rocky coastline characterised by coves and headlands, with an impressive number of important geological exposures.
 - Numerous fishing villages and small ports, many now developed into bustling summer tourist destinations, with small coves, quays and fish cellars slipways predominating.
 - An undulating shillet (shale) plateau, with open vistas and a characteristic network of stone-faced earthen banks (Cornish hedgebanks), many enclosing fields in use since medieval

⁴² Cornwall AONB Management Pkan 2016 to 2021 available at <<https://www.cornwall-aonb.gov.uk/management-plan>>

⁴³ <http://publications.naturalengland.org.uk/publication/6654414139949056>

times. From higher ground there are long views across a rather uniform landscape of mixed farming, with small villages and market towns.

- Renewable energy structures, (eg wind and solar farm)s, which are a recent addition to the landscape.
- Broadleaved wooded valleys, dominated by internationally important western oak woodland habitat, which dissect the plateau and lead to the south coast.

Gribben Head - Polperro Heritage Coast

A.99 Heritage coasts are 'defined' rather than designated: there isn't a statutory designation process like that associated with national parks and areas of outstanding natural beauty (AONB).

A.100 They were established to conserve, protect and enhance:

- the natural beauty of the coastline
- their terrestrial, coastal and marine flora and fauna
- their heritage features
- encourage and help the public to enjoy, understand and appreciate these areas
- maintain and improve the health of inshore waters affecting heritage coasts and their beaches through appropriate environmental management measures
- take account of the needs of agriculture, forestry and fishing and the economic and social needs of the small communities on these coasts

A.101 That part of the NDP Designated Area that is AONB is also part of the Gribben Head to Polperro Heritage Coast.

LOCAL DESIGNATIONS

Cornwall Local Landscape Character Assessment

A.102 At the local level, the Cornwall LCA describes variations in character between different areas and types of landscape, providing an evidence base for local development frameworks and plans, articulating what people perceive as distinctive and special about all landscapes in Cornwall. It also sets out strategies and guidelines for the protection, management and planning of the landscape. The following LCAs cover the Neighbourhood Plan area, as viewed on the Cornwall Interactive Mapping Tool:

- LCA CA22: South East Cornwall Plateau (majority of the higher land above and to either side of the Looe Rivers);
- LCA CA23: Looe Valley Rivers (the core of the Neighbourhood Plan area, dividing the plateau).

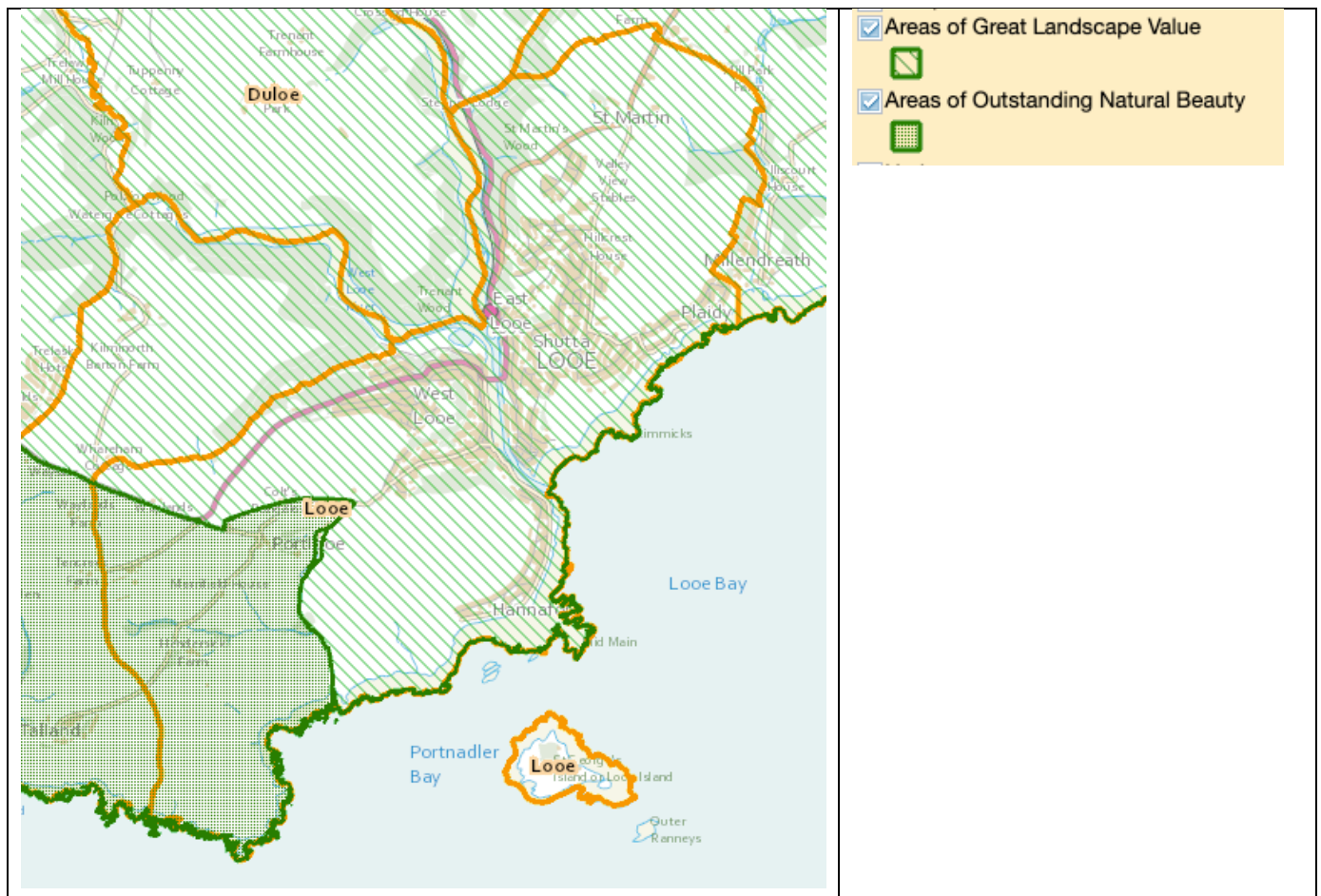


Figure 18: AONB and AGLV Looe NDP Designated Area.

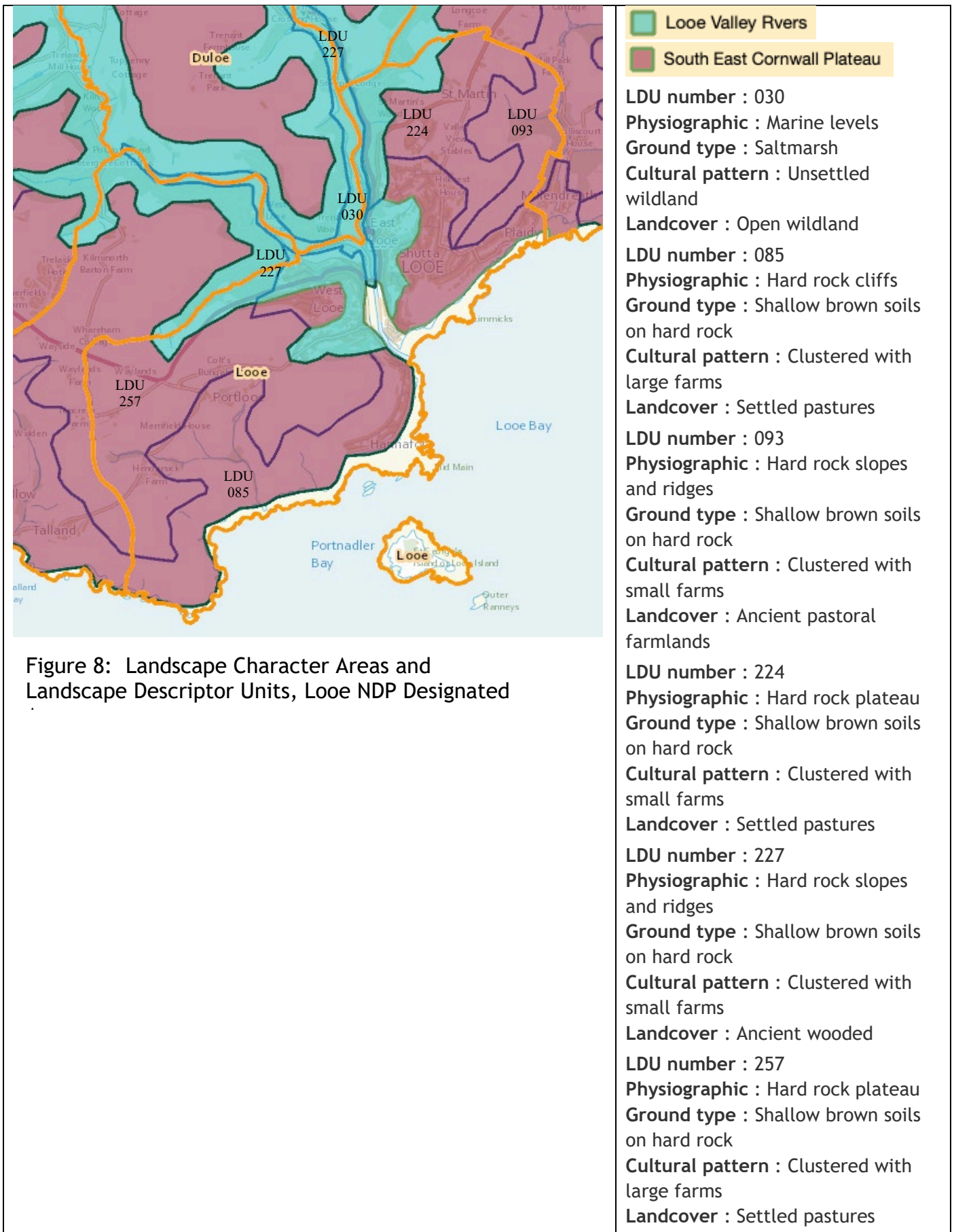


Figure 8: Landscape Character Areas and Landscape Descriptor Units, Looe NDP Designated

A.103 Each LCA is accompanied by a descriptive statement⁴⁴. The most important parts of these statements for the Looe NDP Designated Area baseline are those covering the current condition of and pressures on the landscape:

South East Cornwall Plateau LCA 22

Description	<p>‘...an extensive sloping plateau intersected by river valleys. Inland it is an agricultural working open pastoral landscape with some arable areas becoming more small scale in landscape character towards the east. Tree cover is generally sparse, mainly associated with Cornish hedges and around farms and buildings. Along the coast the dramatic coastline features cliffs in the west and in the east around Rame Head and between these are the sandy beaches of Whitsand Bay. The area inland is generally sparsely populated with dispersed settlement and isolated farms....Elsewhere small villages are a feature particularly on the higher ground, and along the coast there are significant coastal settlements....’</p>
Condition	<p>‘Intensively managed, both pasture and arable land with closely cut hedges that lack hedgerow trees and in some parts are degraded. Impacts from rural housing where this is on a large scale and of poor design. The urban edges of Liskeard and Looe are also making an impact on the area where they are creeping onto the high ground....Ecological corridors are fragmented and there is only relic patch survival. The age structure of trees appears to be even and mature. The degraded condition and ecological fragmentation is due to obvious and widespread removal of Cornish hedges, although they are well maintained and distinctive in some parts...’</p>
Pressures	<p>‘Agricultural intensification. Demand for rural housing and expansion of large settlements in adjoining Landscape Character Areas. Tourism and recreation pressure along coast.’</p>

Looe Valley Rivers LCA 23

Description	<p>‘Deep narrow wooded twin river valleys (East and West Looe) flowing south into the sea at Looe..... Mainly dense broadleaved woodland and conifer plantation on valley slopes, with some improved pastoral farmland. The incised river valleys contain few settlements the</p>
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⁴⁴ https://www.cornwall.gov.uk/media/3627266/Landscape_Best_Practice_Aug_2011_Full-version-Web.pdf

	main ones being Herodsfoot in the north and Looe at the coast.’
Condition	Generally good condition, but loss of oak woodland to conifer plantations impacts on visual appearance of wooded slopes and biodiversity..... Impact of transport corridors is mitigated by landform and woodland. There is some impact on Looe from tourism/recreation pressure, specifically related to visitor capacity, especially for parking as well as traffic from the fish market.’
Pressures	Urban expansion on the edge of Liskeard and Looe. Tourism/recreation pressure on Looe.

Area of Great Landscape Value

A.104 Those parts of the Designated Area not in the AONB are in the Looe and Seaton Valley Area of Great Landscape Value (AGLV). These areas are landscapes designated as being of County importance. The Looe/Seaton area is described as follows:

An extensive area along the south coast lying to the south of Liskeard and stretching from Looe to Millbrook.

This is a south facing plateau landscape dissected by parallel south running valleys. Inland these valleys are generous with gently sloping sides that form the rolling nature of the countryside, the rounded hills making the landscape soft and welcoming. The fields spreading over the hills are quite large and divided by thick high hedges which provide a strong pattern linked with a network of deep high hedged lanes. Within the valleys are small woods of native trees and large plantations of softwoods. Closer to the coast the landform becomes more dramatic with steep breaks in the topography and steeper sides to the valley. The inland landscape is protected by a high coastal ridge which on the seaward side is terminated by rocky cliffs broken by small inlets and coves. The major valleys open out onto drowned valleys or rias lined with thick oak woodland down to the tide line. On the eastern boundary is St Johns Lake and this is part of the Tamar Estuary complex. The proposal includes the valleys of the East and West Looe Rivers, the River Seaton, the valleys east of Polbathic and the coastal strip from Donderry to the AONB boundary at Rame as well as sat Johns Lak, and proposed extensions around the River Tiddy just north of Tideford and another at Coldrenick.

Looe Local Landscape Character Assessment

- A.105 In order to understand how the landscape around Looe could accommodate future housing growth, Looe Town Council commissioned Cornwall Council’s Public Space Team in August 2016 to undertake a landscape capacity assessment of the settlement’s edge.
- A.106 The landscape around the edge of Looe was divided into 13 separate land parcels. Each land parcel being a wedge extending from the settlement edge out into the landscape. Each contains a linear section of built settlement edge, as well as a proportion of the adjacent landscape. How far each land parcel extends into the landscape reflects the settlement’s landscape setting, and groups land with similar characteristics. The delineation of the land parcel follows field boundaries, roads or other features which can be easily identified on the ground.
- A.107 The assessment discounted any land covered by the following important designations: - Site of Special Scientific Interest (SSSI) - Regionally Important Geological and Geomorphological Sites (RIGS) - Special Areas Of Conservation (SAC) - Special Protection Areas (SPA) - County Wildlife Sites (CWS) - Flood zones

A.108 In stage 2 These land parcels were then assessed using an objective methodology to determine the landscape capacity of each to accept change⁴⁵.

A.109 Figure 9 shows the various land parcels and their capacity to accept change.

Summary of Future Baseline

A.110 New development has the potential to lead to small but small cumulative changes in landscape and townscape character and quality in and around the Neighbourhood Plan area. This includes the loss of landscape features and impact on areas with an important visual amenity value both within the designated area and further afield, for example along the coast.

A.111 In the absence of the plan, inappropriate levels of development within the open countryside could negatively impact upon the landscape features which contribute to the distinctive character of the LCAs and land parcels which define the Neighbourhood Plan area, along with the the special qualities of the AONB.

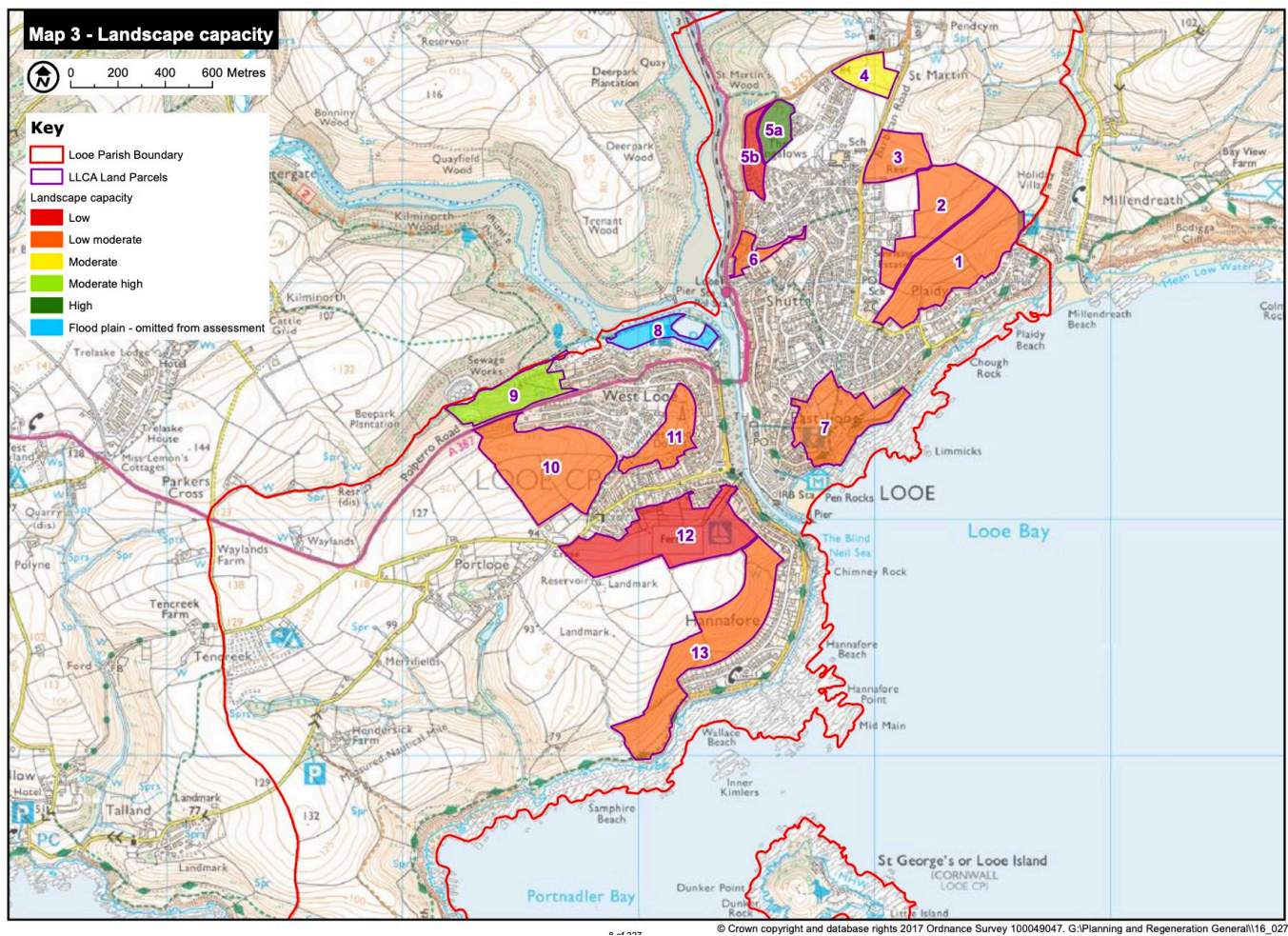


Figure 19: Landscape Cells examined in Looe Landscape Character Assessment

Key Sustainability Issues

A.112 The western most quarter of the Neighbourhood Plan area is located within the boundary of the Cornwall AONB. This area has an open coastal landscape incised by the short coastal stream dropping from Portlooe to Port Nadler Bay. It is mainly agricultural but features a small hamlet (Portlooe) and Tencreek Holiday Park.

A.113 The remainder is an Area of Great Landscape Value (AGLV).

⁴⁵ http://plansupport.services/wp-content/uploads/2018/07/Looe-LLCA-V3_compressed-1.pdf

- A.114 There are two LCAs and thirteen land capacity parcels which define the character of the Neighbourhood Plan area in terms of topography and drainage, land cover and land use, field and woodland pattern, building distribution, transport pattern and historic features, aesthetic and sensory features.
- A.115 The views across and along the two river valleys, the townscape looking up the valley sides from the river and town, and long distance views along the coast and inland are an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process.

Looe Conservation Area



Designated Area



Listed Buildings



Scheduled Monuments

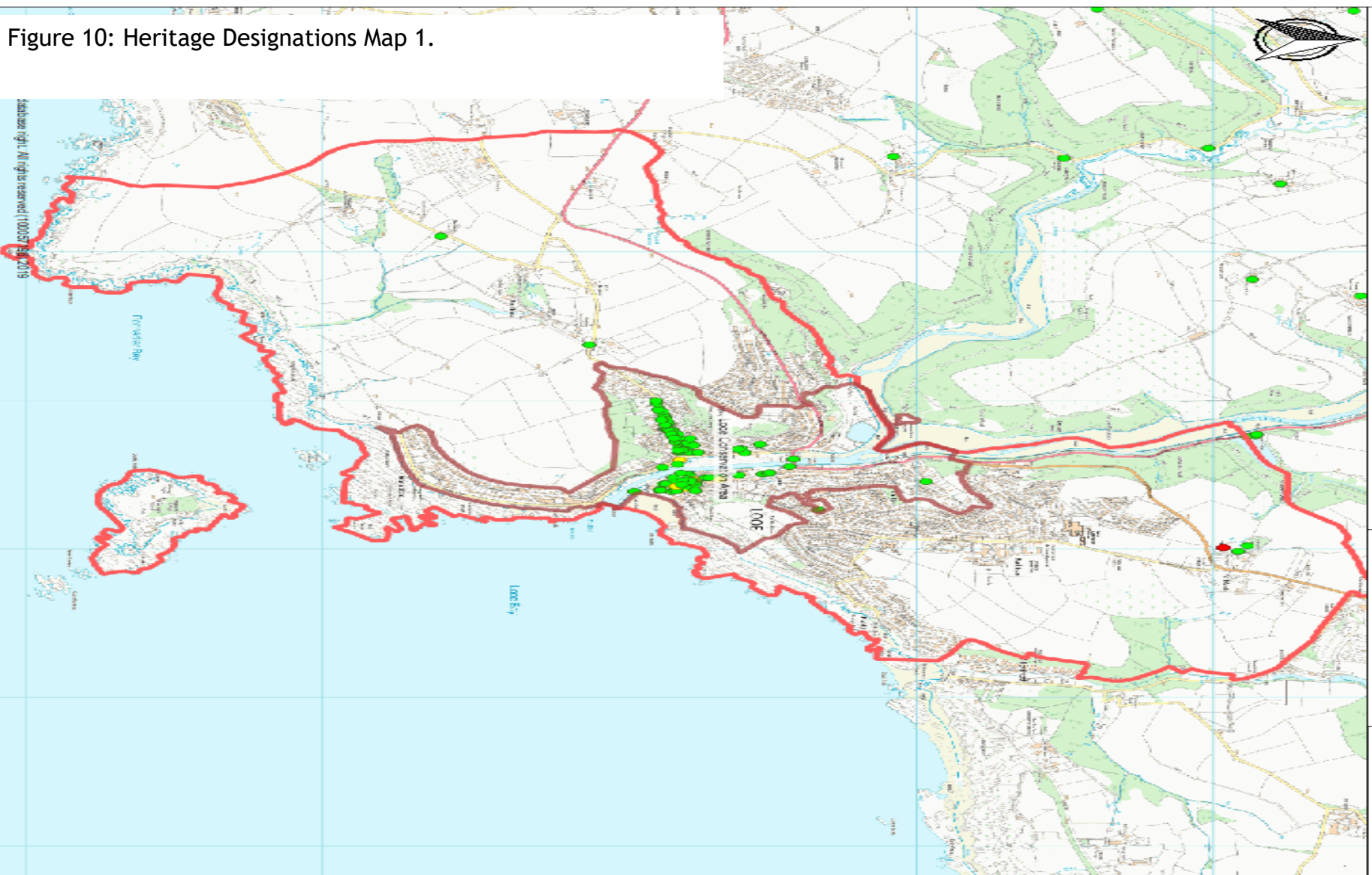


Figure 10: Heritage Designations Map 1.

Context Review

- A.116 **The National Planning Policy Framework (NPPF)** includes the following provisions for heritage matters:
- Key Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a *‘manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of existing and future generations’* (Para 184). This should take account of *‘the wider social, cultural, economic and environmental benefits’* of conservation, including *‘the desirability of sustaining and enhancing the significance of heritage assets’*, the opportunities to draw from the historic environment to support the character of a place, and recognising the positive contribution new development can make to local character and distinctiveness (Para 185).
 - Plans should set out a *‘positive strategy’* for the *‘conservation and enjoyment of the historic environment’*, including those heritage assets that are most at risk (Para 185)..
 - *‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance’* (Para 193).
- A.117 **‘A Green Future: Our 25 Year Plan to Improve the Environment’** the Governments 25 Year Environment Plan, includes policies within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’ and Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ which directly relate to the Historic Environment SEA theme.
- A.118 **The Government’s Statement on the Historic Environment for England**⁴⁶ sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.
- A.119 **Historic England Guidance and Advice notes** are particularly relevant and should be read in conjunction with the others:
- Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (February 2016)⁴⁷ outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development. Principally, the advice note emphasises the importance of:
 - Understanding the different types of special architectural and historic interest which underpin the designations; and
 - Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of conservation areas.
 - Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)⁴⁸ provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment.

⁴⁶ http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference_library/publications/6763.aspx

⁴⁷ <https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>

⁴⁸ <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.

- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2nd Edition) (December 2017)⁴⁹ provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:

Step 1: Identify which heritage assets and their settings are affected;

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;

Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and

Step 5: Make and document the decision and monitor outcomes.

- Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)⁵⁰ outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.

A.120 The Cornwall Local Plan: Strategic Policies 2010-2030 Objective 10 within key theme 4 refers to enhancing and reinforcing local natural, landscape and historic character and distinctiveness and raising the quality of development through; 'a. Respecting the distinctive character of Cornwall's diverse landscapes' ...and...'c. Excellence in design that manages change to maintain the distinctive character and quality of Cornwall.'

A.121 CLP Policy 24 relates to the historic environment. It states that development proposals will be permitted where they will sustain the cultural distinctiveness and significance of Cornwall's historic rural, urban and coastal environment by protecting, conserving and where appropriate enhancing the significance of designated and non-designated assets and their settings. Development proposals will be expected to:

- sustain designated heritage assets
- take opportunities to better reveal their significance
- maintain the special character and appearance of Conservation Areas, especially those positive elements in any Conservation Area Appraisal
- conserve and, where appropriate, enhance the design, character, appearance and historic significance of historic parks and gardens
- conserve and, where appropriate, enhance other historic landscapes and townscapes, including registered battlefields, including the industrial mining heritage
- protect the historic maritime environment, including the significant ports, harbours and quays.

A.122 The following former Caradon District Local Plan policy is also carried forward to the Cornwall Local Plan:

*Policy CL9: Areas of Great Landscape Value (saved from the Caradon Local Plan)
Proposed development in the Areas of Great Landscape Value identified on the Proposals Map will not be permitted if it would materially harm the character of the particular area*

⁴⁹ <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

⁵⁰ <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>

and if it does not closely reflect the traditional building styles and local materials, or the characteristic pattern of settlement, in the particular area.

A.123 Cornwall Council's Historic Environment Supplementary Planning Document [Draft]⁵¹ requires the historic environment impact assessments to:

- identify the site, the heritage assets and their settings
- Understand its significance, its sensitivities and capacity for change irrespective of any known proposals
- Understand the potential impact of specific proposals on that significance
- Use that understanding to inform the design process to:
- look for opportunities to avoid, minimise or mitigate impact
- look for opportunities to better reveal or enhance significance, create a more sustainable and interesting place
- justify any harmful impacts (in terms of sustainable development, the need for change, overriding benefits etc.)
- offset negative impacts through recording, disseminating and archiving archaeological and historical information.

Summary of Current Baseline

STATUTORILY PROTECTED HERITAGE ASSETS

A.124 **Listed Buildings** and other structures are those that have been listed by the Secretary of State (for Digital, Culture, Media and Sport) as being of special architectural or historic interest. The general principles are that all buildings built before 1700 which survive in anything like their original condition are likely to be listed, as are most buildings built between 1700 and 1850. Particularly careful selection is required for buildings from the period after 1945. Buildings less than 30 years old are not normally considered to be of special architectural or historic interest because they have yet to stand the test of time

A.125 On listing, buildings are graded as I, II* or II. The grading is a general indication of the level of importance of the building. Grade I and II* buildings make up roughly 2.5% and 5.8% of the total list, respectively. Over 90% are Grade II.

A.126 The effect of listing is that Listed Building Consent will be required for demolition or alteration or extension works that affect the character of the building as a building of special architectural or historic interest. Consent is sought from the local planning authority and procedurally is handled much like a planning application. Anyone carrying out works without proper consent may be required to reverse them and/or face prosecution.

A.127 Historic England record that there 1 Grade I, 8 Grade II*, and 113 Grade II Listed Buildings in the Looe NDP area, and 1 Scheduled Ancient Monument.

A.128 **Scheduled Ancient Monuments** are historic buildings or sites that are included in the Schedule of Monuments kept by the Secretary of State for Digital, Culture, Media and Sport, under the Ancient Monuments and Archaeological Areas Act 1979. Monuments are not graded, but all are, by definition, considered to be of national importance. Once a monument is scheduled any works to it, and flooding and tipping operations that might affect it, with few exceptions require scheduled monument consent from the Secretary of State, (not the local planning authority).

A.129 According to the National Heritage List for England Historic there is only 1 Scheduled Ancient Monument in the Looe NDP area.

A.130 A full list of all LBs and SAMs in the Looe NDP area can be found here:
<http://www.futurelooe.town/data/uploads/521.pdf>

⁵¹ <http://plan4saltash.co.uk/wp-content/uploads/2018/05/Historic-Environment-SPD-Draft.pdf/>

A.131 **The Conservation Area** at the centre of Looe was first made in January 1973 under the Town and Country Planning Act as follows:

"for the purpose of conserving and enhancing the architectural and historic character of the designated area as a whole and to ensure that special regard is paid to the architectural and visual qualities of the area when proposals for development are under consideration"

A.132 Conservation Area designation confers planning controls which include:

- the requirement in legislation and national planning policies to preserve and/or enhance
- local planning policies which pay special attention to the desirability of preserving or enhancing the character or appearance of the area
- control over demolition of unlisted buildings
- control over works to trees
- fewer types of advertisements which can be displayed with deemed consent
- restriction on the types of development which can be carried out without the need for planning permission (permitted development rights)

A.133 Looe's conservation area has been extended following the 2002 CISI report and the 2009 Conservation Area Appraisal to eventually cover the Hannafore area, Trenant Point and 3 additional properties on Polperro Road, However it was not extended to cover the northern area of Shutta, nor the Woodlands View estate.

A.134 An **Article 4 Direction** was made to cover the original Conservation Area in Fig 10/11 The Article 4 requires that a planning application must be made for the following types of building alterations, which might otherwise qualify as permitted development:

- the erection, alteration or removal of a chimney on a house, or on a building within the curtilage of a house and any of the following developments which would front a highway, waterway or open space:
- the enlargement, improvement or other alteration of a house, including alteration to or replacement of windows and doors
- the alteration of a house roof, including re-roofing
- the erection or construction of a porch outside any external door of a house
- the erection or demolition of a gate, fence, wall or other means of enclosure within the curtilage of a house
- the painting or rendering of natural stone walls and other minor works.

A.135 The requirement to seek planning permission in the above cases gives local authority officers an opportunity to provide guidance to property owners on forms of development that are appropriate for the Conservation Area and thus help to conserve the special character and appearance of the area.

LOCAL ASSESSMENTS

A.136 The Cahill Partnership and Cornwall Archaeological Unit produced a **Cornwall Industrial Settlements Initiative (CISI) study of Looe**⁵² in 2002. CISI was a Conservation Area Partnership intended to produce an overview of the history, present character and importance of Cornwall's industrial settlements to help determine where, for example, new Conservation Areas should be designated (and existing ones revised) and provide the basis for Conservation Area Statements (to be drawn up subsequently by District Conservation Officers).

A.137 The CISI raised the following issues related to identity, local distinctiveness and historic character of Looe, which are still of concern:

⁵² http://www.futurelooe.town/plan_evidencebase.php?id=41

- **Walls** formed a dominant element of the townscape on both hillsides but were poorly treated: large advertising signs, inappropriate render and use of colour, and removal for parking were harming the townscape.. Existing policies needed to make more explicit the importance of these features.
- **Station Road and the riverside** suffered from a distinct lack of character that contrasted with the strong sense of place, both on the adjoining valleyside and within the valley as a whole. There was no clear direction as to the use and treatment of this area and was ineffectively designed in visual terms. The siting and design of the clinic and its car park made no contribution to the settlement’s historic character, using some appropriate materials but inappropriate in form and design.
- **Churchend** was dominated by mid-late 19th century buildings and townscape which new buildings and environmental enhancement schemes should aim to enhance and set off. Removing the unpleasant frontage to the Boscarn, to reveal its interesting original façade was seen to be likely to have an extremely beneficial effect on local character and appearance.
- **West Looe Square** enhancement and environmental improvements were seen as much needed .
- **Skyline housing landscaping** to soften the impact of the large mid-late 20th century housing estates high on the skylines above both East and West Looe., continuing the well-established tradition in the town of extensive areas of greenery on the hill slopes.

A.138 The CISI Report also recommended that the Conservation Area should be extended at Polean/Polvellan, to reflect the approach to the town along Polperro Road, at the Hannafore estate and to the north of Shutta to include the area of ancient borough land including Commonwood House, and the site of the old gasworks. (See Para 5.15).

A.139 Polvellan and Klymiarven were noted to be recognised gardens and it was recommended that as well as enhancement and management schemes, consideration should be given to having them registered as historic gardens, or developing local polices in regard to such gardens.

A.140 Referring to Listed Buildings, the CISI report noted that commercial and domestic buildings of the 19th century, the surviving shops, pubs, houses and hotel, many of which are of good quality, were under-represented in the List. Some may have been too altered to merit inclusion, such as the Boscarn and Polvellan, but certainly merited detailed investigation.

A.141 Also under-represented in the List were the walls, letterboxes, lampposts, drainage gullies, areas of paving, wells, quayside cranes and other street ephemera which are important in forming the character of the town, and in some cases are important historic structures in their own right.

A.142 The CISI report concluded that the production of a list of locally significant structures which contribute substantially to the character of the settlement was an imperative. It also called for greater ‘Buildings-at-Risk’ activity and substantive and enforceable policies in the local plan and Article 4 Directions. The latter were suggested to control the demolition of all walls and hedges, especially for the creation of hard standings, to reinforce the existing controls which only currently cover the curtilages of dwelling houses, and to control the demolition and alterations to individual houses, and to prevent demolition of free-standing outbuildings, which do not front onto highways (to counter the restriction in the extent of current controls).

A.143 Also recommended were:

- A full and detailed survey of archaeological potential in Looe and, if necessary, an additional policy requiring proper recording of archaeologically sensitive sites before development;
- Management schemes, development briefs and conservation plans for some of the most sensitive historic buildings and areas, if not already done;

- Site-specific design guidance for the town, based on a detailed audit of materials, designs, details and character;
- The backland areas and rear lanes of West and East Looe to be recognised as an important aspect of character, and their informal qualities enhanced, while at the same time preserving the often very important buildings that survive;

A.144 A **Conservation Area Appraisal**⁵³ was carried out in 2009. The Appraisal:

- identified the most important features and characteristics, buildings and local distinctiveness that ought to be preserved or enhanced.
- Indicated the special character of sub areas which have a distinctive individual character.
- Evaluated those buildings that were key, and which made a positive, neutral or negative contribution.

A.145 In summary, the Appraisal concluded that Looe had an enduring character inherited from its fascinating past, retaining a settlement pattern that reflected its development from earliest times, which were represented by distinctive but closely related character areas, and featured at least 100 buildings dating from 17th Century or earlier. The extensive Listed Buildings stock (103) needed review to include 18th and 19th Century structures and possibly a supplemental 'Local List'. The appraisal also detected a certain local complacency about detrimental change, the symptoms being: poor use of key spaces, traffic congestion, untidiness, and many poor alterations to historic and architecturally interesting buildings, It found that these factors outweighed any positive actions taken so far, leading to a tangible negative impact on the character and appearance of the town.

A.146 A **Conservation Area Management Plan** for Looe based on the Appraisal was adopted in 2009 with the intention of **providing** guidance for the management of change in Looe Conservation Area and defining planning policies with respect to heritage and character.

A.147 The Management Plan noted that Looe had 'acute problems' with careless alterations that were harming the perceived quality of the town. It **supported** a combination of planning policy, advice, grant support and enforcement to prevent further decline, calling for a more coherent approach. The Plan recommended a series of supplementary policy recommendations to be adopted in an SPG document, which could form a part of the baseline for the SEA process and if appropriate included in the NDP. The issues covered include:

- Overall aims
- Conservation areas - general principles, application of flexible standards
- Historic settlement status and boundary
- Historic heritage - management agreements
- Review historic settlement boundary
- Archaeological Notifications
- Survey of archaeological potential
- Rear or side elevations or roofscapes
- Retaining walls and steps
- Streetscape management agreements
- Shopfront design Guide
- Review Article 4 Directions
- Listed and Locally Listed Historic Buildings

⁵³ <https://plansupport.services/wp-content/uploads/2019/11/Looe-Conservation-Area-Appraisal-and-Management-Plan-full-compressed.pdf>
 Strategic Environmental Assessment for the Looe Neighbourhood Plan

- Streetscape and Enhancement schemes
- Crime prevention
- Trees in conservation areas
- Development, tree surveys and conditions
- Housing densities and infill sites
- Trees, gardens, greenery, open spaces etc.
- Development outside conservation area
- The setting of settlements
- Polean/Millpool area

A.148 As the most recent of the assessments described above dated from 2009, the NDP Steering group commissioned the **Looe Heritage and Character Assessment**⁵⁴ to bring the baseline picture up to date and identify current policy needs.

A.149 Prepared by AECOM, the Assessment draws from the Cornwall Industrial Settlements Initiative Report 2002, Looe Conservation Area Appraisal, 2009, and Looe Conservation Area Management Plan, 2009. Its findings were as follows:

Positive aspects of character

- There are a number of positive aspects of character which should be sustained, reinforced or enhanced. These relate to general description of qualities which need to be retained or reflected in new development.
- The survival of historic buildings of traditional architecture and local vernacular detailing, which contributes to a strong sense of place;
- The survival of medieval topography and layout, especially West Looe Hill and Fore Street;
- The survival of post medieval buildings including timber-frame examples, especially in the commercial core of East Looe;
- The survival of buildings that illustrate the trading and fishing past of Looe;
- Mid-19th century buildings including the quays, the harbour, the seafront, the Cliffside developments, the stately commercial buildings on Buller Quay, the warehouses and pier at the estuary mouth;
- Municipal buildings including the old and new Guildhall, St Mary's and St Nicholas Church;
- Landscape setting of the town within a steep sided river valley;
- East Looe beach, Banjo Pier and the various promenades connect the urban townscape to the waterfront;
- Mixed use regeneration of the harbour including unified, contemporary architecture provides identity to the harbour and diversity to the town centre;
- High provision of mature trees and vegetation above the settlement boundary which contributes to an overall leafy character;
- Many shops in East Looe are independent and therefore locally distinctive and provide strong active frontage to the street;
- The East Looe river bisects the centre of the town from north to south;
- High concentration of community facilities including RNLI Looe Coastguard Station, Looe Community Fire Station; and

⁵⁴ http://plansupport.services/wp-content/uploads/2017/10/NP-HCA-Looe-LR-FINAL-170815_compressed.compressed.pdf

- The south west coast path provides recreational opportunity across the landscape for Looe and surrounding communities.

Issues to be addressed

A.150 The following issues were been identified which could be addressed through new development or active management.:

- enhancement proposals for Church End and the seafront;
- conflict between vehicular and pedestrian traffic;
- relocation of the fire station, West Looe Square and generally enhancement of the square; and
- retaining walls from the 19th century are dominant element of the townscape on both hillsides (North Road within the neighbourhood plan area).
- Existing policies need to make more explicit the importance of these features.
- Unsympathetic extensions, domestic porches to former historical buildings, the insertion or alteration of openings, the use of non-traditional materials in historic buildings, which cumulatively may undermine the historic character and appearance of the area;
- Newer development within the town, particularly infill plots and low-quality restoration which have not respected the established scale, height, massing, density, alignment and materials of the existing townscape;
- The combination of commercial harbour and access to the quayside for tourists on East Quay resulting in equipment such as bins, pallets and machinery within the public realm requires management.

In summary, the issues identified in the earlier studies were seen to persist, despite the steps that have been taken, and may continue in the future.

Issues highlighted by the Looe Neighbourhood Plan Steering Group:

- The built heritage of Looe is also a finite resource that is irreplaceable and under threat;
- The continuing loss through replacement of original architectural features and surviving historic fabric such as Victorian windows and doors;
- Numerous small but unsympathetic building interventions to unlisted buildings;
- Residential extensions that are out of scale with local roofscape;
- Examples of poor shopfronts, signage, advertising and communications equipment are changing the traditional character to one of ‘any street’;
- Temporary parking along Fore Street and West Quay on the road itself presents safety hazard for pedestrians using the footpath along Fore Street because of varying width, high kerbs and parked vehicles; and
- Limited consideration given to the preservation/ maintenance of trees or to new tree planting in the public domain, loss of trees in the town centre to parking.

Sensitivity to change

- There are also some elements which are particularly sensitive to change. These relate to high quality landscape features, green infrastructure assets and local distinctiveness:
- Heritage buildings and their settings, in particular the clusters of listed buildings in the Looe conservation area;
- Limited public green space within residential areas is a valuable local resource;
- Trees above the settlement boundary contribute to the leafy character of streets and properties on higher ground and the gradual loss of these trees erodes the quality of the area;

- The East Looe River and associated woodland corridor, the river estuary and East Looe beach are significant natural features within the area;
- The active frontage and variety of independent shops and local business which increases variety and local distinctiveness are susceptible to change due to pressure from larger chains entering the town;
- The south west coast path PRoW; and
- The tranquillity of Looe is sensitive to increases in traffic, leading to congestion on local roads and car parks.

Principles for managing change

- Should focus on sustaining, reinforcing or enhancing the maritime character of the neighbourhood Plan area and reinforcing local distinctiveness conferred by its built form, landscape and natural assets. The following principles should be considered when defining policies with respect to heritage and character:
- New developments should respect the layout, scale, mass, height and appearance of neighbouring buildings and buildings across the Neighbourhood Area;
- High quality materials and a high standard of workmanship should be applied in the repair, or other works, to the public realm;
- Conserve and protect heritage assets and their setting, including those located outside the Looe Conservation Area;
- Proposals to alter existing buildings should demonstrate a detailed understanding of the history and design qualities of the buildings and provide a clear rationale for how this is taken account of in the design of the alterations proposed;
- Preserve the sense of enclosure in enclosed parts of the townscape by maintaining the compact street pattern;
- Proposals for properties in higher ground should retain or enhance well-vegetated front gardens that demonstrate a strong relationship with the surrounding landscape , and avoid substantial areas of paving for parking that create car-dominated streetscapes;
- Protect the areas environmentally sensitive places such as waterfront, woodlands and the river, which contribute to the richness of character in the rural landscape, from encroachment of development;
- A common palette of materials, street furniture and signage should be further developed to enhance the quality and legibility of the public realm (Some groups have developed neighbourhood design guidance or design codes which set out standards expected from new development);
- New development should maintain and enhance access to the harbour and should retain open views across the harbour and estuary from key vantage points; and
- The working harbour is a key draw for tourism and careful design could provide an opportunity for interaction with the public and for the town to advance its reputation for daily fresh-caught fish.

A.151 In addition to policy protection, this assessment has identified projects or initiatives which could be financed through the Community Infrastructure Levy (CIL) and Section 106 (S106) contributions, or if the project is not eligible for these mechanisms, through other means of funding or delivery. The projects include:

- Opportunities to improve way finding should be considered, including interpretation boards providing information about the landscape and heritage within the area;
- The area surrounding the War memorial at the junction of Fore Street and Station Road should be enhanced to reinforce this key nodal point and gateway to Looe;

- Public realm enhancements should be considered for public access and walkways particularly at Buller Quay; and
- The existing riverside footpath be enhanced to become a primary pedestrian route from the Railway Station.

A.152 **Locally important Heritage Features** are not necessarily subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life and value as heritage features.

A.153 A basic review of the Historic Environmental Record (HER) for Cornwall (accessed via the Heritage Gateway), shows there are 161 records within Looe NDP area including a variety of structures and archaeological finds, some with a mining legacy (including the former Looe-Liskeard Canal), medieval and post-medieval features (including railway infrastructure, chapels, settlements and field systems). There are also records of Bronze Age barrows and occasional features which date back to the Neolithic era.

A.154 Historic Landscape Characterisation (HLC) is shown in Figure 20 overleaf.

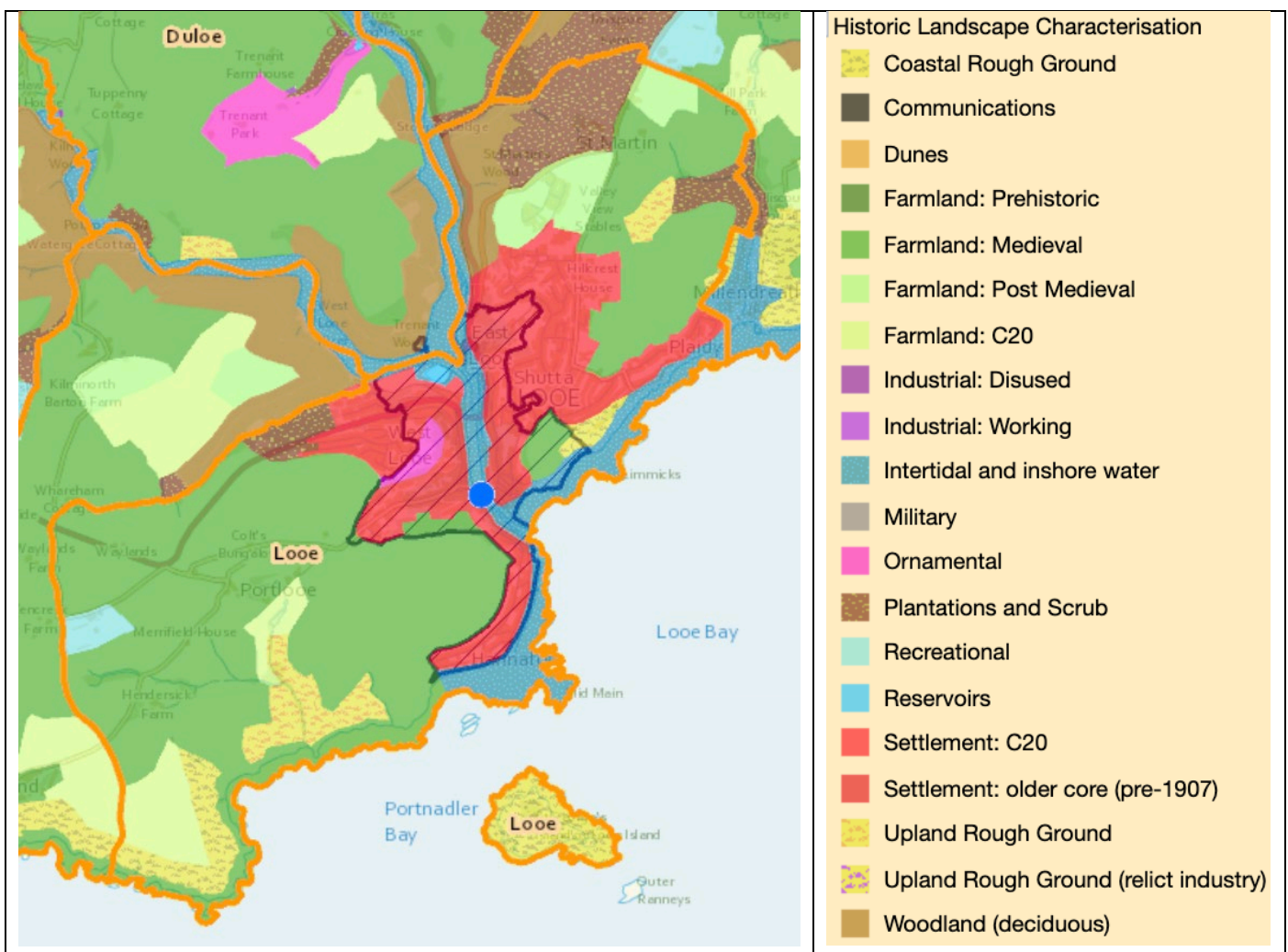


Figure 20: Historic Landscape Characterisation

Summary of Future Baseline

A.155 Issues harming the essential historic fabric of Looe were identified in studies in 2002 and 2009 and although some measures have been taken, its apparent from the 2017 Heritage Assessment that many of the issues persist and may be expected to persist into the future unless a firmer planning policy base backed by stronger encouragement and enforcement is put in place.

A.156 New development (including extensions and alterations) in the Neighbourhood Plan area has the potential to impact on the fabric and setting of heritage assets, for example, through

inappropriate design and layout. Existing historic environment designations offer a degree of protection to heritage assets and their settings, although this is not proving to be effective in some cases.

- 6.4. Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of the town and better reveal assets' heritage significance.

Key Sustainability Issues

- A.157 The Neighbourhood Plan area hosts an extensive variety of heritage assets which reflect the towns long history as a busy seaport and fishing community.
- A.158 Many of these are nationally and locally designated heritage assets. There is 1 Grade I listed building, 8 Grade II* listed buildings, and 113 Grade II listed buildings, and 1 scheduled monument, Looe Conservation Area covers most of the town.
- A.159 Following a basic review of the HER for Cornwall, there are 161 records within Looe NDP area including a variety of structures and archaeological finds with a mining legacy, medieval and post-medieval features, and finds dating back to the Bronze Age, Neolithic and Roman eras.
- A.160 The 2002 Cornwall Industrial Settlements Initiative Report and the subsequent Conservation Area Appraisal 2009 provide an in-depth understanding of the special interest of the area, and the challenges it faces. It is clear from these that harm to the towns substantial and important historic environment is continuing and that action to control the impact of change is essential.

LAND, SOIL AND WATER RESOURCES

Policy Context

- A.161 **The EU's Soil Thematic Strategy**⁵⁵ presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.
- A.162 Adopted in October 2000, the purpose of the **EU Water Framework Directive (WFD)** is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater, driving a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:
- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
 - Promote the sustainable use of water;
 - Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances;
 - Ensure the progressive reduction of groundwater pollution; and
 - Contribute to achieving 'good' water quality status for as many waterbodies as possible by 2027.
- A.163 **The National Planning Policy Framework (NPPF)** includes the following provisions:
- *'Planning policies and decisions should contribute to and enhance the natural and local environment by:*

⁵⁵ http://ec.europa.eu/environment/soil/index_en.htm

- *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and*
- *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'*
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- 'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'
- 'Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.'
- Planning policies and decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs', and 'promote and support the development of under-utilised land and buildings.'
- Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.

A.164 The Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the Land, Soil and Water Resources SEA theme though the policies contained within Chapter 1 'Using and managing land sustainably', Chapter 4 'Increasing resource efficiency, and reducing pollution and waste', Goal 2 'Clean and plentiful water', Goal 5 'Using resources from nature more sustainably and efficiently' and Goal 8 'Minimising waste'

A.165 Other key documents at the national level include **Safeguarding our Soils: A Strategy for England**⁵⁶, which sets out a vision for soil use in England, and the **Water White Paper**⁵⁷, which sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources. In terms of waste management, the **Government Review of Waste Policy in England**⁵⁸ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

A.166 The **National Waste Management Plan**⁵⁹ provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and

⁵⁶ <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>

⁵⁷ <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

⁵⁸ <http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>

⁵⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf

provisions of the revised Waste Framework Directive 2008/98/EC . This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.

A.167 **The Cornwall Local Plan: Strategic Policies** Objective 9(b) within key theme number 4 refers to *'make the best use of our resources by maximising the use of previously used land'*. The following also directly relate to Land, Soil and Water Resources.

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

Summary of Current Baseline

Soil Resources

A.168 **The Agricultural Land Classification (ALC)** classifies land into size grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 of poorer quality. In this context, there is a national policy based need to avoid loss of higher quality 'best and most versatile' agricultural land.

A.169 In terms of the location of the best and most versatile agricultural land, a detailed classification has only been undertaken on the area to the east of the Barbican. This is Grade 2 land, although being closely confined by lesser grade land and urban development.

A.170 The Provisional Agricultural Land Quality dataset⁶⁰ shows that the Neighbourhood Plan area is predominantly covered by Grade 3 and 4 agricultural land in the north east and south west of the Neighbourhood Plan area, however; without the subset grading (3a or 3b) it is not possible to tell at this stage whether all of the agricultural land is considered to be 'best and most versatile'. It is also important to note that the national dataset is of very low resolution, and may not necessarily provide an accurate reflection of the agricultural land quality within the Neighbourhood Plan area.

⁶⁰ <http://publications.naturalengland.org.uk/publication/144017?category=5954148537204736>

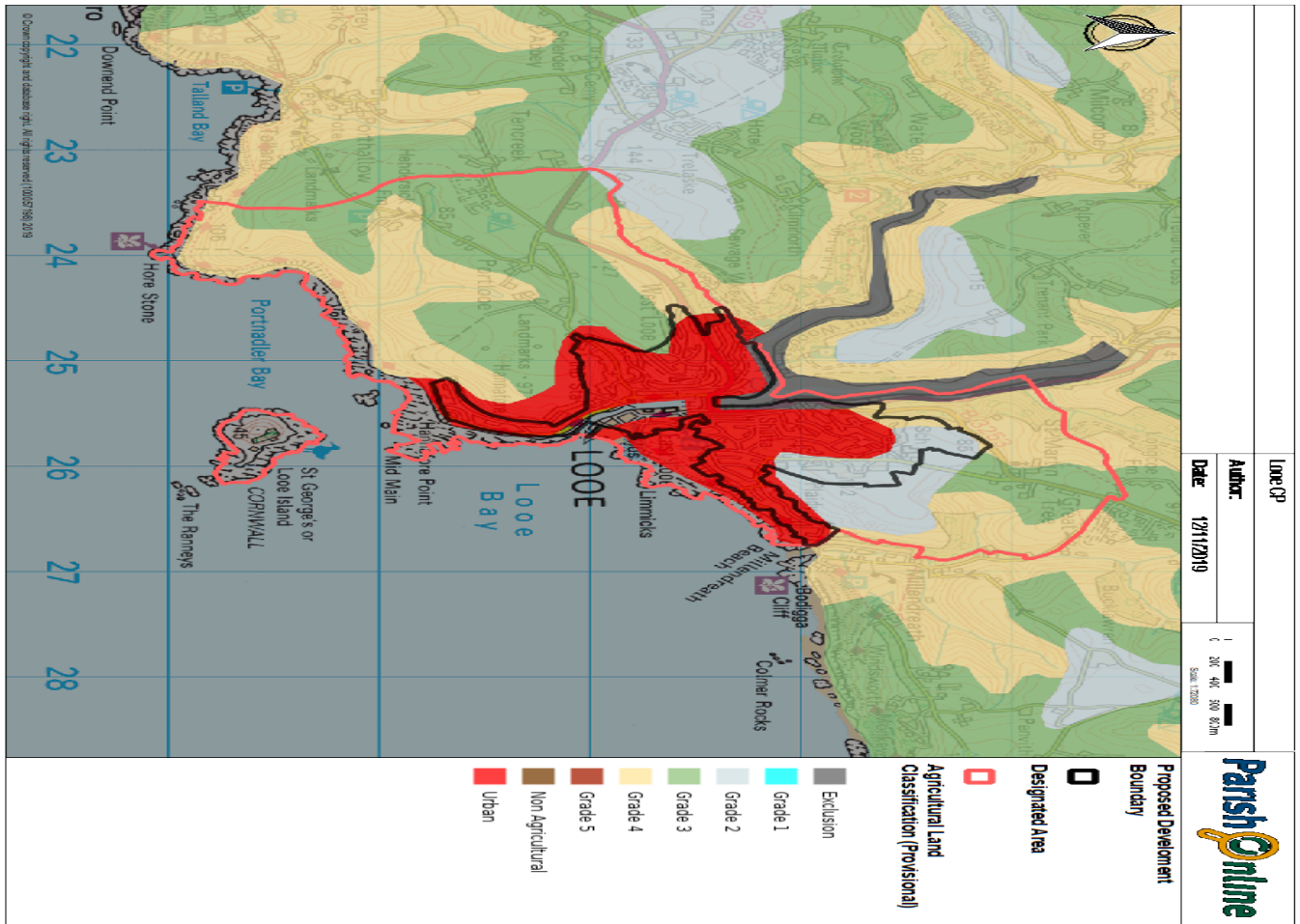


Figure 21: Agricultural Land Classification.

Water Quality and Water Resources

A.171 The main watercourse flowing centrally through the NDP Designated Area is the Looe River, Its catchment is approximately 10,700 hectares. It has two main branches, the East and the West Looe rivers, which drain from the southern slopes of Bodmin Moor to the coast. Therefore Looe is in two operational catchment areas⁶¹. The eastern branch is approximately 16 kilometres (km) long. It starts near St Cleer and flows south, passing close to the western outskirts of Liskeard. The western branch is approximately 14km long and starts near Dobwalls. There are many tributaries which flow to meet these main branches which increases the length of stream in the catchment significantly. The lower reaches of the two rivers form the Looe Estuary and come together as they flow through the town. From the headwaters to the estuary, both rivers fall steeply and are subject to rapid changes in water levels after periods of rainfall. It is a rural area, ranging from open moorland to rolling hills with steep-sided river valleys running across them in the past there was extensive mining activity in the north of the catchment, which has left a legacy of abandoned mines and workings. There are mostly grassland fields in the upper reaches of the catchment giving way to more arable land in the south of the catchment. The steep river valleys are heavily wooded. Urban areas which influence the Rivers include Liskeard, Dobwalls, Duloe and Looe. There are holiday parks and campsites in the catchment concentrated at the coast around Looe. The condition of water resources in the NDP area are therefore very much dependent on influences active outside its boundaries.

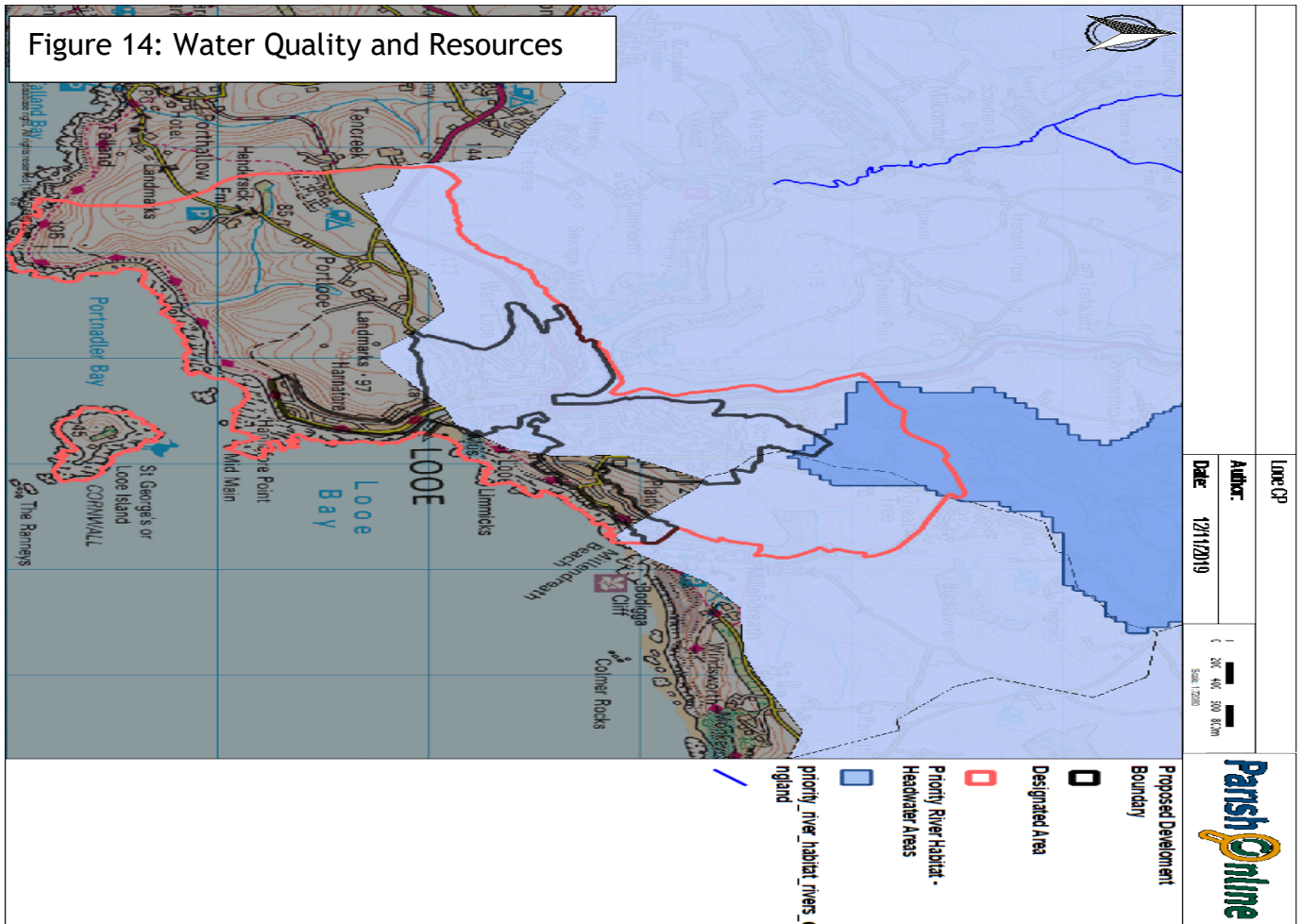
A.172 Most of the NDP Designated Area is within a **Bathing Water Catchment Zone of Influence**. These are areas where if heavy rainfall occurs it may lead to surface water runoff causing a reduction in water quality at a designated bathing water.

⁶¹ <https://environment.data.gov.uk/catchment-planning/search?type=placename&k=Looe&q=http://environment.data.gov.uk/catchment-planning/so/Town/looe>

- A.173 Beach areas are designated under the **Bathing Waters Directive (76/160/EEC)** to protect the environment and public health at locations where bathing is not prohibited and is traditionally practised by a large number of bathers. The Directive requires that water quality at all designated bathing waters must meet specific microbiological requirements in order to protect the health of those that bathe there. East Looe Beach, at the mouth of the Looe River and at the heart of the town, is a Designated Bathing Water,
- A.174 East Looe Beach bathing water is subject to short term pollution caused when heavy rainfall or high tides wash faecal material into the sea from livestock, sewage and urban drainage via rivers and streams. At this site the risk of encountering reduced water quality increases after rainfall and typically returns to normal after 1-3 days. 7 warnings advising against swimming due to an increase risk of short-term pollution were issued in 2018 for East Looe bathing water. Its current status is 'sufficient'.
- A.175 Extensive work has been carried out to reduce the frequency of storm discharges, increase sewage treatment capacity, and encourage better farming practices to improve the quality of run off. However, misconnections of domestic equipment such as toilets and washing machines continues to be an issue.
- A.176 To the north-east the NDP area includes a **Priority River Habitat Headwater** designated around the valley of the stream running from Wringworthy to join the East Looe River at St Martins Wood. Such areas are designated on the basis of the naturalness of the landcover - this area contains headwater streams of high naturalness.
- A.177 The **Environment Agency Catchment Data Explorer**⁶² describes the Looe rivers passing though the NDP Designated Area as being 'heavily modified' by human activity but to have an overall 'Good' ecological and chemical quality (2016 data)
- A.178 **Groundwater Source Protection Zones (SPZs)** have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. Within the Neighbourhood Plan area, there are no designated SPZs.

⁶² <https://environment.data.gov.uk/catchment-planning/WaterBody/GB520804806300>

Figure 14: Water Quality and Resources



Mineral Resources

A.179 There are no mineral resources (natural concentrations of minerals or, in the case of aggregates, bodies of rock that are, or may become, of potential economic interest due to their inherent properties) notified as existing within the NDP Designated Area.

Summary of Future Baseline

A.180 In the absence of a detailed Agricultural Land Classification assessment for the majority of the Designated Area, it remains uncertain whether new development in the Neighbourhood Plan area will lead to losses of higher quality (best and most versatile) agricultural land. However, given the scale of development likely to be proposed in the NDP the impact is unlikely to be significant.

A.181 Future development within the NDP Designated Area has the potential to affect water quality through diffuse pollution, wastewater discharges, misconnections, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Neighbourhood Plan area and wider area.

A.182 On a larger catchment wide scale, worsening conditions resulting from climate change, such as more intensive, more frequent rain fall, will lead to increased potential for pollution of run-off into the Rivers, impacting on the quality of the Bathing Water at East looe Beach. Although initiatives to improve storm water handling, limit surcharging and introduce better land management practices will continue across the area, local measures may be need to contribute.

Key Sustainability Issues

A.183 Although the ecological and chemical quality of the Looe River was identified as ‘Good’ in 2016, bathing water quality at East Looe Beach was last recorded (2019) as being only ‘sufficient’.

Continued climate change-led increases in rainfall intensity and amount pose a threat to this position.

A.184 There is a lack of evidence to ascertain agricultural land quality within the Neighbourhood Plan area, national provisional quality datasets indicating some Grade 2 with mostly Grade 3 and 4 land, and as part of a precautionary approach it is noted that there is the potential for loss of high quality (Grade 2 and Grade 3a 'best and most versatile') agricultural land.

Policy Context

A.185 The National Planning Policy Framework (NPPF) includes the following provisions for population and community matters:

- The overarching social objective to; *‘support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing.’*
- To support the Government’s objective of significantly boosting the supply of housing, strategic policies *‘should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.’*
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
- In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a *‘sufficient choice of school places’ and taking a ‘proactive, positive and collaborative approach’ to bringing forward ‘development that will widen choice in education’.*

A.186 **‘Ready for Ageing’, the report of the Select Committee on Public Service and Demographic Change**⁶³ warns that society is underprepared for the ageing population. (51% more people aged 65 and over and 101% more people aged 85 and over in England in 2030 compared to 2010; and a 90% increase in people with moderate or severe need for social care). The report states that *‘longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises’* and calls for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

⁶³ <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>

A.187 All of the six objectives of the **Cornwall Local Plan: Strategic Policies** within key themes 1 and 2 directly relate to Population and Community. The following policies are relevant to this SEA theme:

- Policy 3: Role and function of places;
- Policy 4: Shopping, services and community facilities;
- Policy 5: Business and tourism;
- Policy 6: Housing mix;
- Policy 7: Housing in the countryside; and

Summary of Current Baseline

Population

Figure 22: Population growth 2001-2011

DATE	LOOE	CORNWALL	SOUTH WEST	ENGLAND
2001	5,280	499,114	4,928,434	49,138,831
2011	5,112	532,273	5,288,935	53,012,456
POPULATION CHANGE	-3.2%	+6.6%	+7.3%	+7.9%

Source: NOMIS Census 2001 Usually Resident population Table KS001 Census 2011 Usually Resident population Table KS101EW

A.188 As shown in Figure 22, the population of Looe decreased between 2001 and 2011 in comparison to Cornwall, the South West of England and England averages. In 2017, the mid-year estimate suggested that the population of Looe was 5,194 indicating that there has been a slight population increase since 2011

A.189 Looking at age structure in the 2011 Census, Looe had a disproportionately high number of people (38.2%) aged 60+ compared to Cornwall (29.7%), the South West (26.4%) and England (22.3%), as shown in Figures 23 and 24. In contrast, a lower proportion of residents are within the working age categories (25-44 and 45-59) in the Neighbourhood Plan area (40.6%) in comparison to the totals for Cornwall (43.4%), the South West of England (44.7%) and England (46.9%). Additionally, 21.1% of residents within the Neighbourhood Plan area are within the younger age categories (0-15 and 16-24), substantially below the totals for Cornwall (27.0%), but slightly less than the totals for the South West of England (28.9%) and England (30.8%).

Figure 23: Age Range 2011

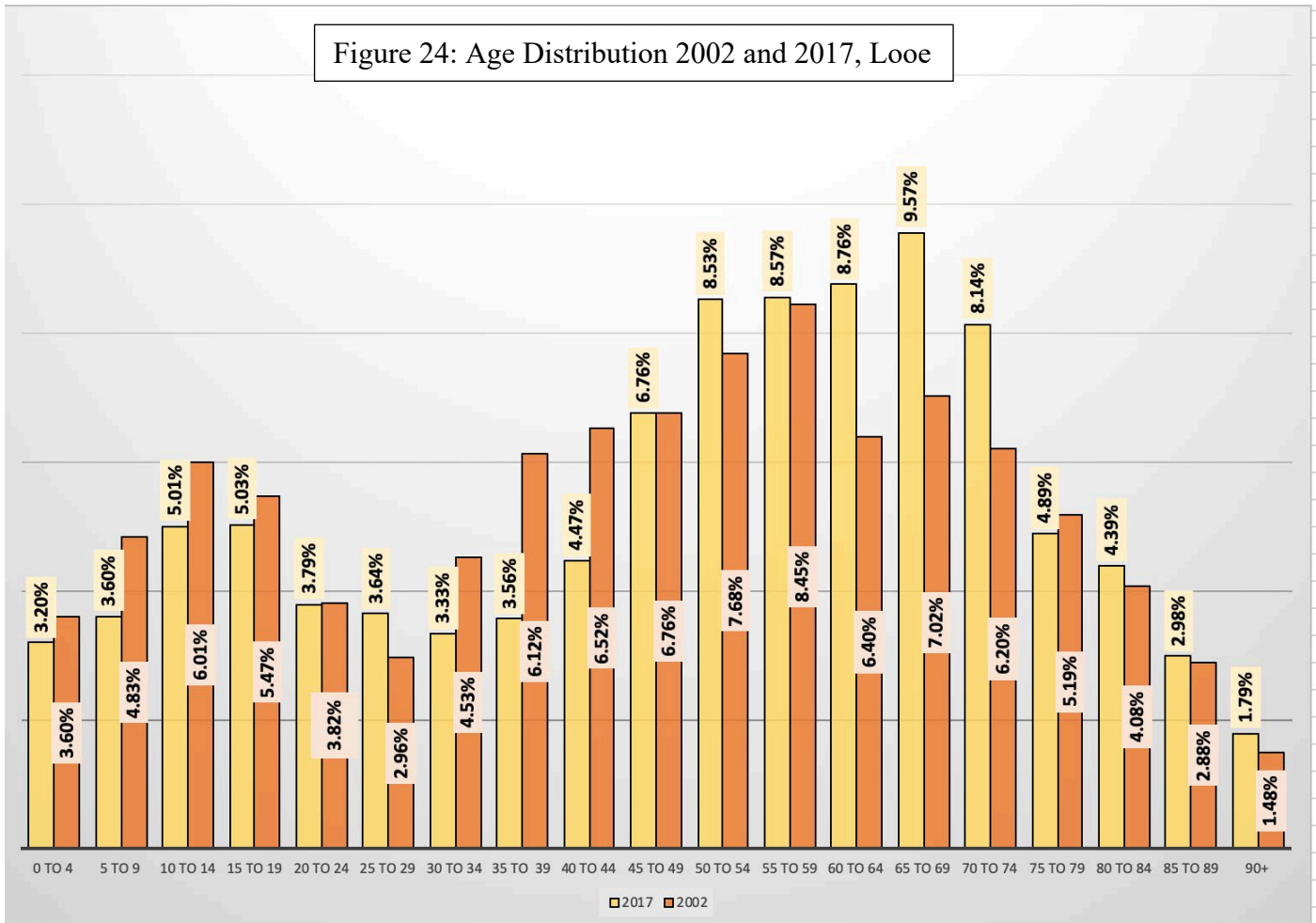
	LOOE	CORNWALL	SOUTH WEST	ENGLAND
0-15	13.5%	16.9%	17.6%	18.9%
16-24	7.6%	10.1%	11.3%	11.9%
25-44	18.1%	22.5%	24.6%	27.5%
45-59	22.5%	20.8%	20.1%	19.4%
60+	38.2%	29.7%	26.4%	22.3%

Source: Census 2011: Age Structure 2011 (Table KS102EW)

A.190 Analysis of the 2017 (most recently available) mid-year population data by 5 year age cohorts in comparison with 2002 reveals further information about the demographic changes active in Looe.

This shows that the proportion of people over 50 now dominates, having grown from 49.4% in 2002 to 57.6% in 2017.

A.191 From 2002 to 2017 the Looe NDP area population grew by 2.8%, the proportion of that population of working age fell by -6.5% and the number of young people (aged 15 to 34) fell by -8.5%, whilst the proportion over retirement age grew by 15.1%. In 2017 people of 65 plus represented 31.8% of the population, compared to 26.9% in 2001. This trend is likely to continue and increase, with 57.6% of the population already being 50 years old or more (See figure 24 below)



Source: Census 2011: Age Structure 2011 (Table KS102EW)

Household deprivation

A.192 Census statistics measure deprivation across four ‘dimensions’ of deprivation. These are:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally ‘bad’ or ‘very bad’ health, or has a long term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

	LOOE	CORNWALL	SOUTH WEST	ENGLAND
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HOUSEHOLD NOT DEPRIVED	36.1%	40.2%	44.8%	42.5%
DEPRIVED IN 1 DIMENSION	35.9%	34.6%	33.2%	32.7%
DEPRIVED IN 2 DIMENSIONS	22.2%	19.9%	17.6%	19.1%
DEPRIVED IN 3 DIMENSIONS	5.1%	4.8%	4.0%	5.1%
DEPRIVED IN 4 DIMENSIONS	0.6%	0.5%	0.4%	0.5%
Source: Census 2011: 'Households by Deprivation Dimensions 2011 (Table QS119EW)				

Figure 25: Household Deprivation 2011.

A.193 Based on the information presented in Figure 25 above, more households are deprived in one or more dimensions within the Neighbourhood Plan area (63.8%) in comparison to Cornwall (59.8%) and England (57.5%), and the South West (55.2%). Out of the 563.8% of households which are deprived in the Neighbourhood Plan area, the majority are deprived in one or two dimensions, which is similar to the regional and national averages.

Index of Multiple Deprivation

A.194 The Index of Multiple Deprivation 2015 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **The Income Deprivation Domain** measures the proportion of the population experiencing deprivation relating to low income. The definition of low income used includes both those people that are out-of-work, and those that are in work but who have low earnings (and who satisfy the respective means tests).
- **The Employment Deprivation Domain** measures the proportion of the working-age population in an area involuntarily excluded from the labour market. This includes people who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **The Education, Skills and Training Deprivation Domain** measures the lack of attainment and skills in the local population. The indicators fall into two sub-domains: one relating to children and young people and one relating to adult skills.
- **The Health Deprivation and Disability Domain** measures the risk of premature death and the impairment of quality of life through poor physical or mental health. The domain measures morbidity, disability and premature mortality but not aspects of behaviour or environment that may be predictive of future health deprivation.
- **The Crime Domain** measures the risk of personal and material victimisation at local level.
- **The Barriers to Housing and Services Domain** measures the physical and financial accessibility of housing and local services. The indicators fall into two sub-domains: 'geographical barriers', which relate to the physical proximity of local services, and 'wider barriers' which includes issues relating to access to housing such as affordability.
- **The Living Environment Deprivation Domain** measures the quality of the local environment. The indicators fall into two sub-domains:
 - a. The 'indoors' living environment measures the quality of housing;
 - b. The 'outdoors' living environment contains measures of air quality and road traffic accidents.

A.195 Two supplementary indices (subsets of the Income deprivation domains), are also included:

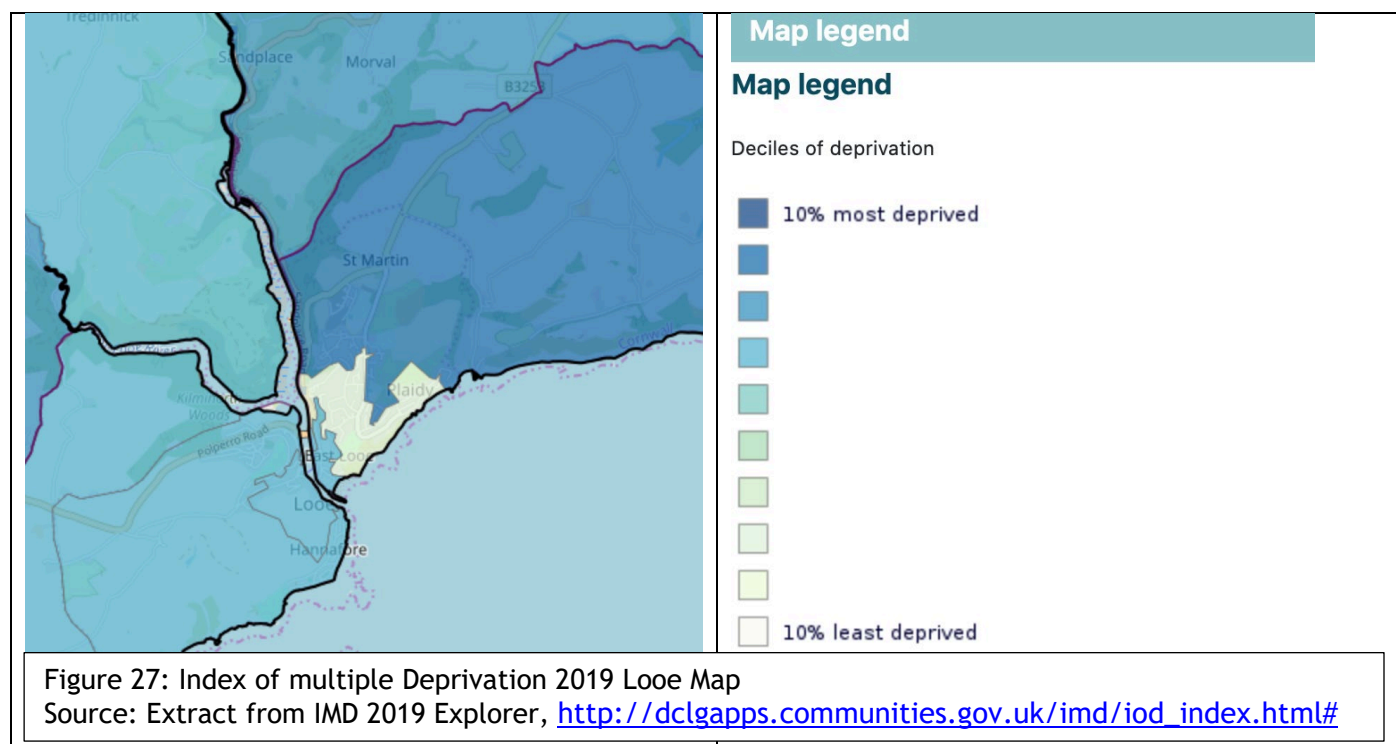
- **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
- **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

A.196 Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

A.197 The Neighbourhood Plan area falls within these LSOAs: Cornwall 037B, Cornwall 037C, Cornwall 037D and Cornwall 028E.

Figure 26: Index of multiple Deprivation 2015 and 2019

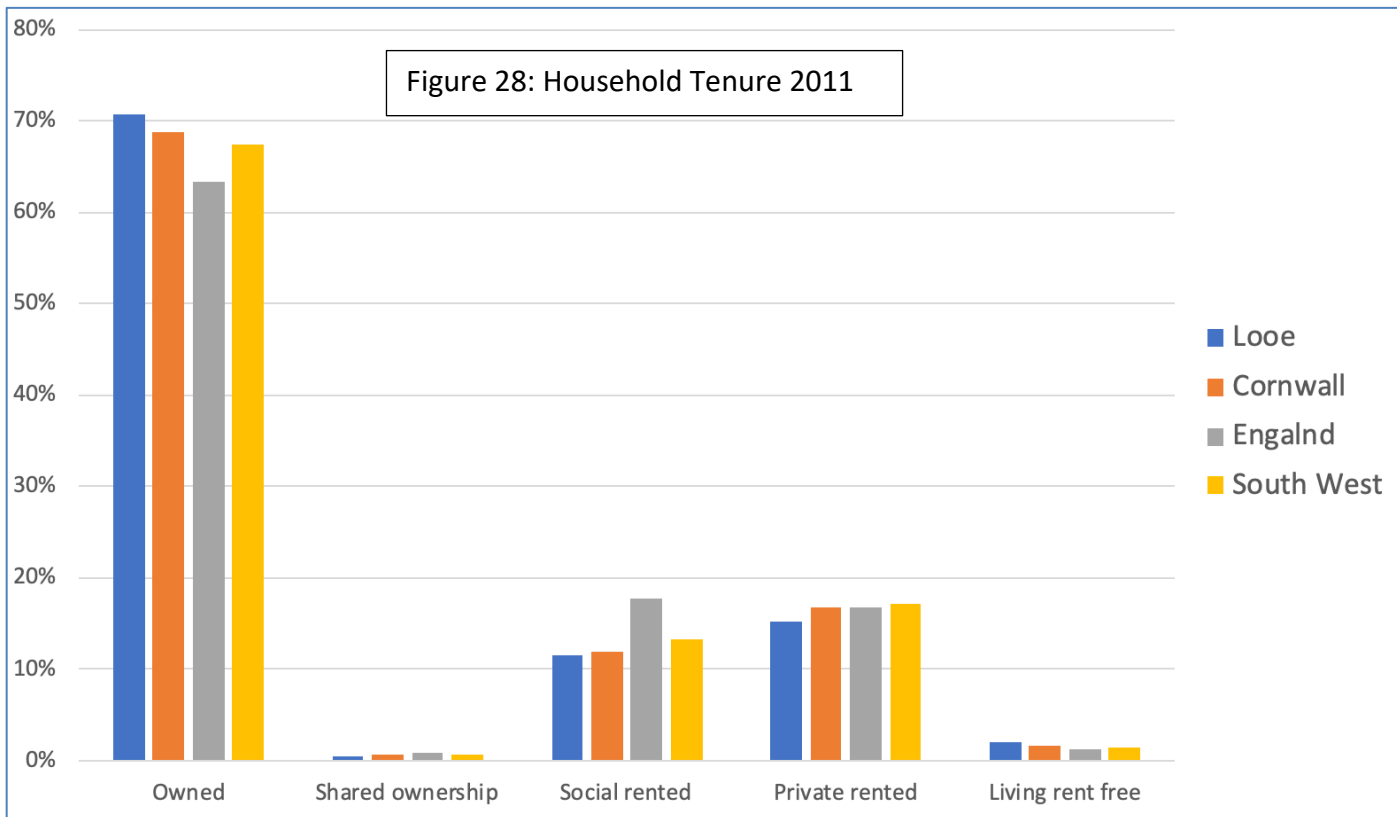
LSOA	RANK 2015*	RANK 2019*
CORNWALL 037B	12181/Amongst the 40% most deprived neighbourhoods in country	11606/Amongst the 40% most deprived neighbourhoods in country
CORNWALL 037C	22028/Amongst 40% least deprived neighbourhoods in the country	23215/Amongst 30% least deprived neighbourhoods in the country
CORNWALL 037D	10298/Amongst the 40% most deprived neighbourhoods in country	12250/Amongst the 40% most deprived neighbourhoods in country
CORNWALL 028E	4428/Amongst the 20% most deprived wards in country	5474/Amongst the 20% most deprived neighbourhoods in country
	* = out of 32844	



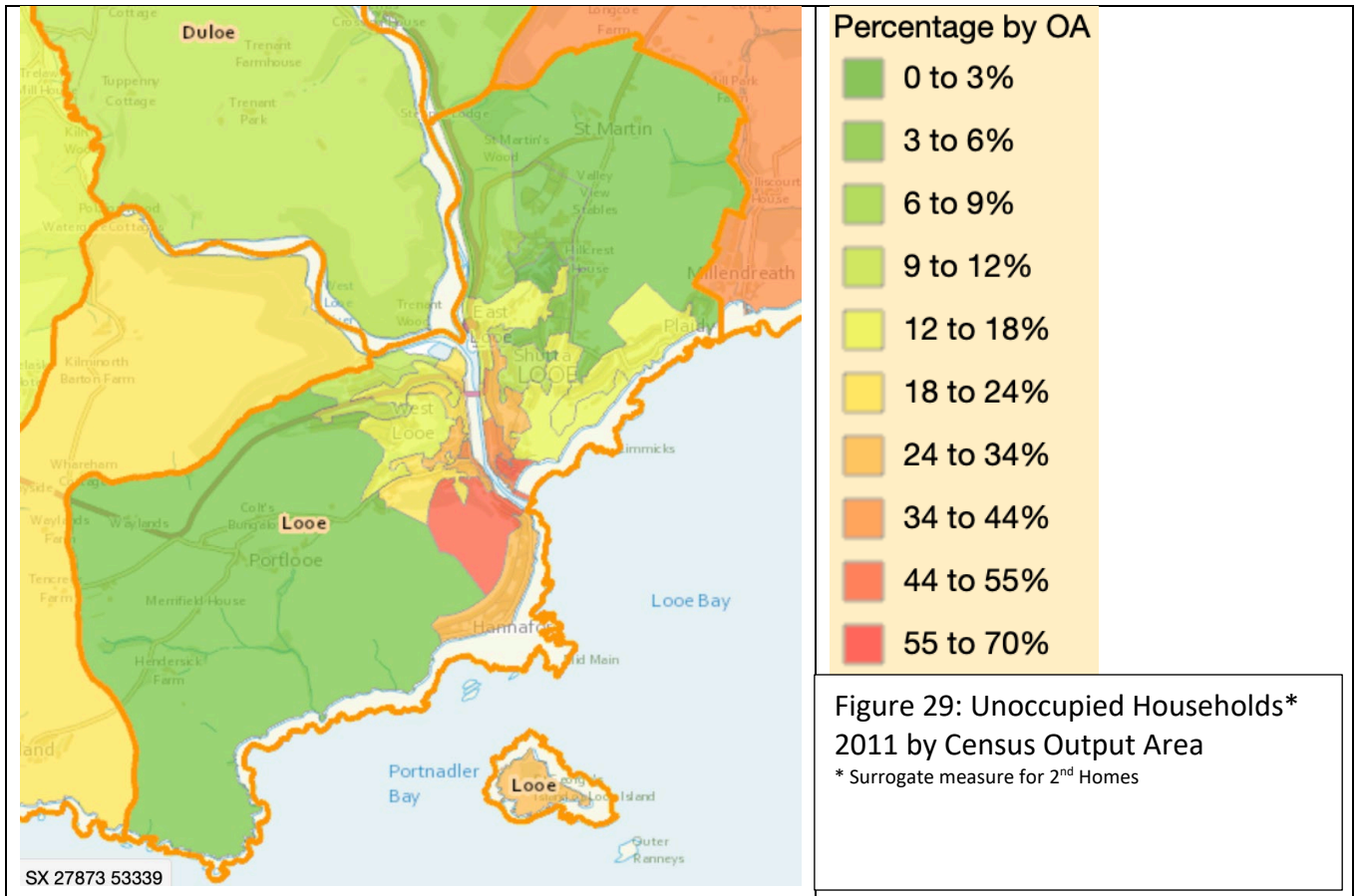
Tenure by Household

A.198 Within the Neighbourhood Plan area, 70.8% of residents either own their home outright or with a mortgage, greater than the totals for Cornwall (68.8%), the South West of England (67.4%) and

England (63.3%). As shown in Figure 21 below there are a lower proportion of residents living within social rented and privately rented in the Neighbourhood Plan area in comparison to the regional and national trends. The percentage of residents in the Neighbourhood Plan area living in shared ownership accommodation (0.4%) is half the equivalent figures for Cornwall (0.8%), the South West of England (0.8%) and England (0.8%). At 2.1% the proportion living rent free is significantly higher than for Cornwall (1.7%), the SW (1.4%) and England (1.3%).



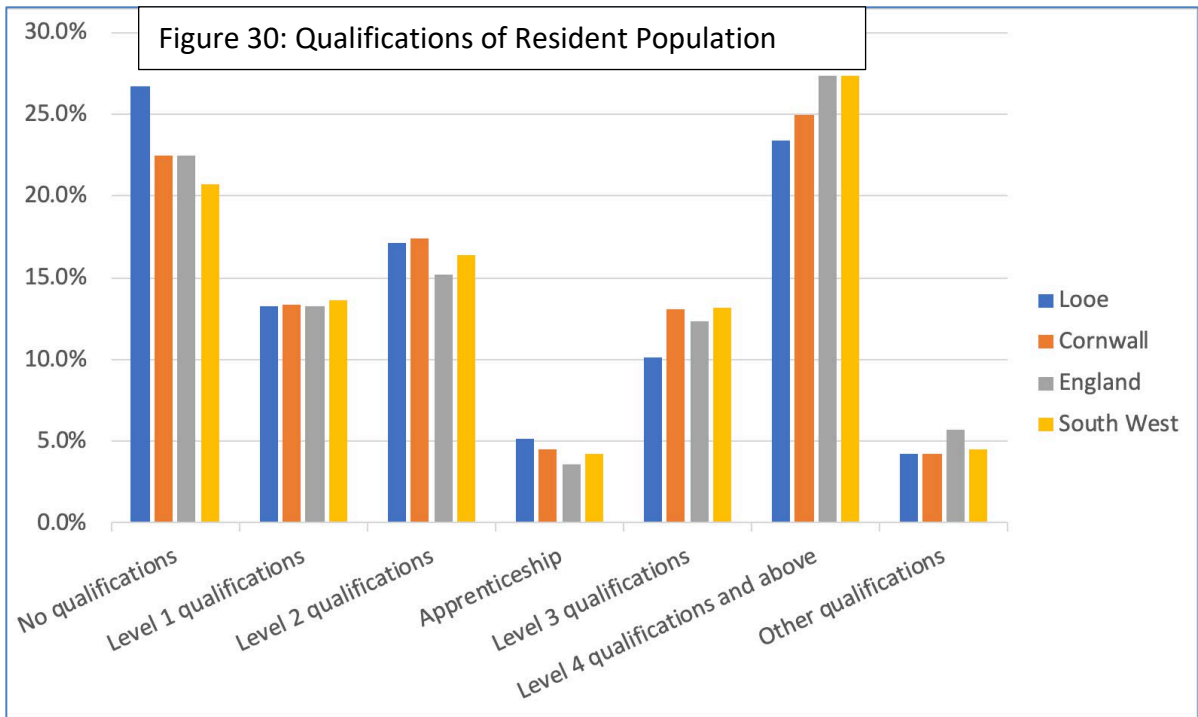
Census 2011: Tenure-Households 2011 (Table QS405EW)



Household Occupation

A.199 The percentage of second homes and holiday-lets in Looe is estimated to be 18.9% overall (based on 2011 Census, Cornwall Council ‘unoccupied dwellings’), with the highest levels being in the historic core and seafront areas, reaching as high as 47.5%. Although not as severe as some parts of Cornwall, these figures are well above average. Figure 29 above indicates the distribution of potential second homes in Census Output Areas within Looe NDP area.

Education



Source: Census 2011: Highest Level of Qualification 2011 (Table QS501EW)

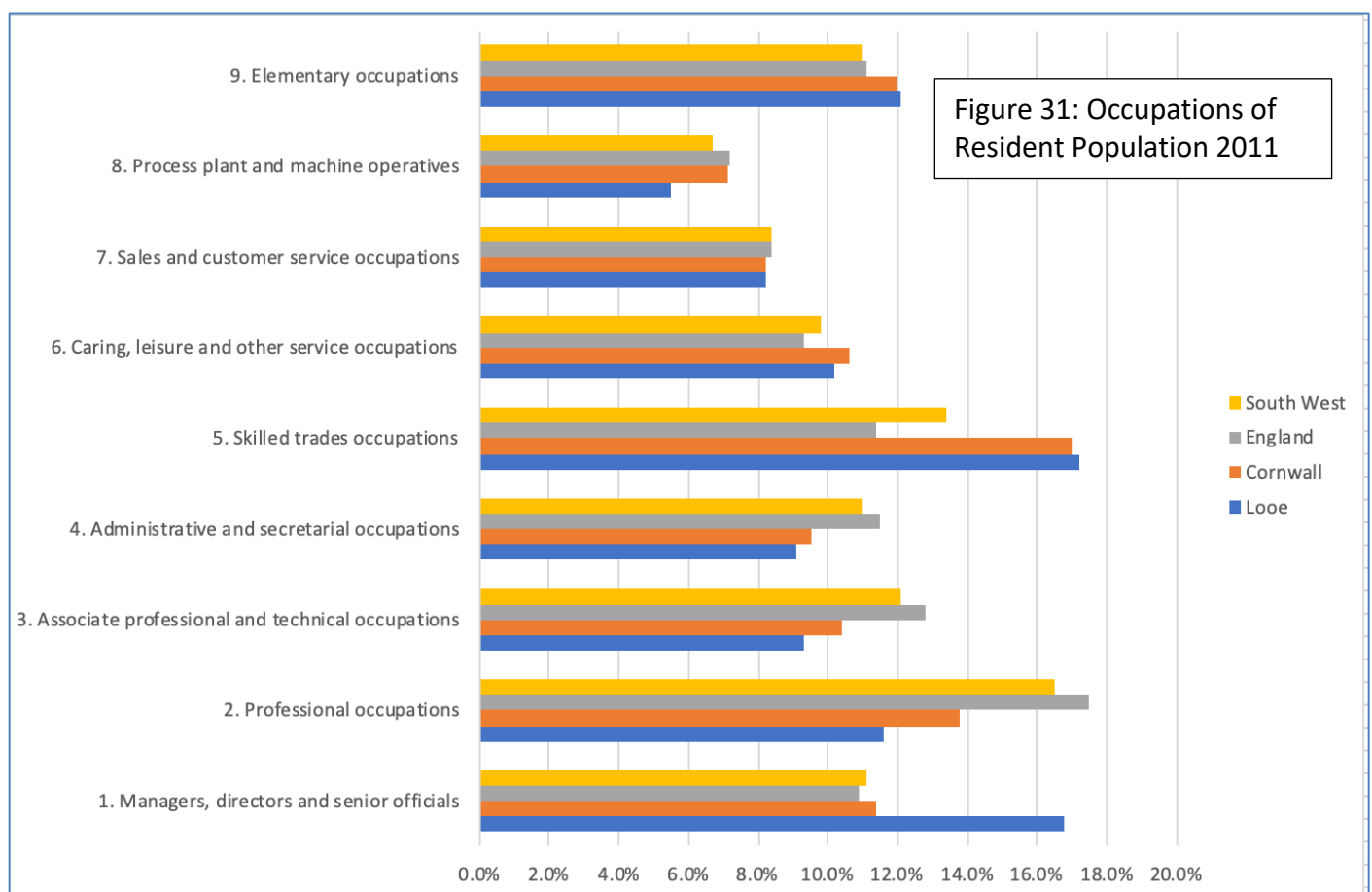
A.200 Based on the 2011 census data presented in Figure 30 above 26.7% of residents in the Neighbourhood Plan area have no qualifications, somewhat higher than the total for Cornwall (22.4%), the South West of England (20.7%) and England (22.5%). Similarly, only 23.4% of residents within the Neighbourhood Plan area have a Level 4 qualification or above, which is notably lower than the proportion for Cornwall (25%) for the South West of England (27.4%) and the total for England (27.4%).

Employment

A.201 Employment within the Neighbourhood Plan area involves five occupation categories which support the most residents:

- Managers, directors, senior officials (16.8%).
- Skilled trades occupations (17.2%);
- Elementary Occupations (12.1%)
- Professional Occupations (11.6%) and
- Caring, Leisure and other Services (10.2%)

A.202 Overall, 67.9% of residents within the Neighbourhood Plan area are employed in one of the above five occupation categories. Notably there is a much higher proportion of managers, directors and senior officials (16.8%) compared to Cornwall (11.4%), the South West (11.1%) and England (10.9%) although the proportions of professional occupations is markedly lower, at only 11.6% compared to 13.8% for Cornwall, 16.5% for the Southwest and 17.5% for England.



Source: Census 2011: 'Occupation 2011' (Table KS608EW)

Community Assets

A.203 The Neighbourhood Plan area has a range of local community facilities which serve the needs of the local community and play a vital role in supporting Looe's sense of identity. The Neighbourhood Plan Steering Group have identified the following as key assets

- The Guildhall

- Millpool Centre
- Quayside Centre
- Looe Children's Centre
- Old Guildhall and museum
- Looe Library
- St Nicholas Church
- Riverside Church
- St Martins Church
- Fire Station
- Police Station
- Looe Community Academy
- Bowling Club
- Tennis Club
- Looe Primary Academy
- St Martins allotments

A.204 Additionally, there are several open areas of local significance within the neighbourhood Plan area. The pre-consultation draft of the Looe Neighbourhood Plan designated the following eight sites as locally important green spaces (LGS), where the area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value and/or biodiversity value:

- Bowling Green, Hannafore
- Tennis Club, Hannafore, West
- West Looe Downs
- West Looe
- Sunrising
- Big Green
- Barbican Football Fields
- Limmicks Road, Barratts site
- Wooldown, Eastcliffe,
- Land to East of Church Hall
- Adjoining Salter
- Millpool
- . North View
- Plaidy
- Polvellan Woods
- Woodlands Way
- Lower Goonrea
- Fairfields
- Churchlands Estate Open Spaces
- Downs Cemetery
- Hannafore Sea Front

Summary of Future Baseline

A.205 Looe clearly has an ageing demographic, both from the ageing of its indigenous population and the influx of retiring or down-sizing migrants. As the population continues to age, this has the potential to place pressures on the existing services and facilities within the timeframe of the Neighbourhood Plan. This could negatively impact on the future vitality of the local community and economy.

- A.206 This ageing trend is likely to increase in pace. As these people grow older their requirement for specialist services and housing will increase dramatically. However, the opportunities to address these needs through the normal housing market is very limited as a result of residential land values and the economies of scale of care provision. There are significant implications for housing and there may be a need for more specialist accommodation to meet the needs of the elderly in the future.
- A.207 As the population ages and the cohorts of younger people diminish, it is possible that their needs may be lost amongst the focus on the needs of the elderly. Combined with the purchasing power of in-migrants this may continue to make it difficult for local young people to enter the home ownership market.
- A.208 Overall levels of deprivation in the Neighbourhood Plan area are likely to remain low in the 40% least deprived category, as the area continues to attract people with higher level occupations elsewhere, and more wealthy retirees. However, growing care needs may generate more caring and elementary sector jobs, which are traditionally not well paid, and which may be occupied by less well qualified local people, whilst the remainder of locally based jobs continue to be focused within tourism, another sector with lower wages, causing pockets of deprivation to continue to exist.
- A.209 Looe is clearly of some interest to those seeking second homes. This may continue, possibly spurred on by the advent of AirBnB.

Key Sustainability Issues

- A.210 From 2002 to 2017 whilst the Looe NDP area population grew by 2.8%, the proportion of that population of working age fell by -6.5% and the number of young people (aged 15 to 34) fell by -8.5%, but the proportion over retirement age grew by 15.1%. In 2017 people of 65 plus represented 31.8% of the population, compared to 26.9% in 2001. This trend is likely to continue and increase, with 57.6% of the population already being 50 years old or more.

Policy Context

A.211 **The National Planning Policy Framework (NPPF)** includes the following provisions for population and community matters:

- a social objective to; *‘support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing.*‘
- *‘Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs - for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.’*
- Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

A.212 **Fair Society, Healthy Lives (‘The Marmot Review’)**⁶⁴ investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that that there is: *“overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”*.

A.213 **The Health and Social Care Act 2012** transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

A.214 **The Cornwall Local Plan: Strategic Policies** Objective 7 within key theme number 3 aims to *‘meet a wide range of local needs in order to improve quality of life and reduce social exclusion’*. Objective 8 within key theme number 3 aims to *‘promote development that contributes to a healthy and safe population by providing and ensuring the appropriate levels of open space and the protection and improvement of air quality’*. The following are also relevant to the Health and Wellbeing SEA theme:

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

Summary of Current Baseline

Joint Strategic Needs Assessment for Cornwall

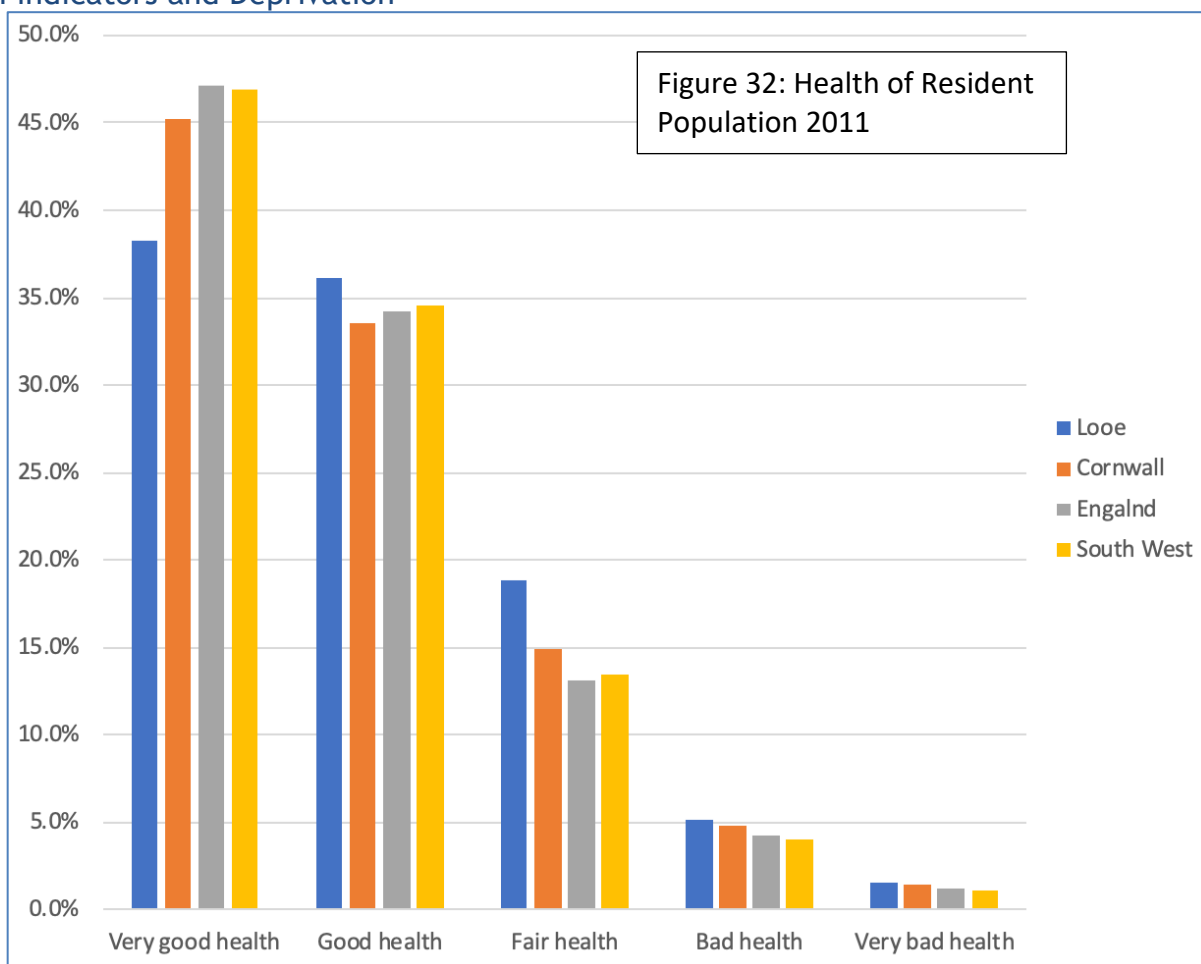
A.215 Reflecting the outcomes of the JSNA for Cornwall, the 2017 Health Profile for the Looe-Liskeard Community Network Area (CNA) contains a variety of key statistics which help to build an

⁶⁴ <https://www.nice.org.uk/media/default/About/what-we-do/NICE-guidance/NICE-guidelines/Public-health-guidelines/Additional-publications/Spatial-planning/the-marmot-review-implications-for-spatial-planning.pdf>

understanding of the community needs. In doing so, the aim of the profile is to help identify where resources could be targeted to improve health and wellbeing and reduce health inequalities. Within the Looe Liskeard CNA⁶⁵:

- 30% of children measured in the National Child Measurement Programme were found to be overweight or obese;
- 37% of elderly people (over 65-year olds) live alone, compared to 39% across Cornwall;
- The leading underlying cause of death across the CNA is disease of the respiratory system; (COPD)
- 30.2% of adults are classified as inactive, with a further 15.1% classified as insufficiently active.
- 13.8% are in fuel poverty
- 16.8% of children are in low income families
- 14.5% of patients are obese compared to 11.8% in Cornwall
- 7.2% of patients are diabetic compared to 6.3% in Cornwall
- 2nd highest level of teenage conceptions in Cornwall.

Health indicators and Deprivation



Source: Census 2011: 'General Health 2011' (Table QS302EW)

A.216 Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality, living environment, income and employment previously discussed in detail in Chapter 8. As highlighted in Figure 32, 74.4% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', lower than for Cornwall (78.8%), and much lower than the South West of England (81.4%) and England (81.4%). Similarly, the percentage of residents in the Neighbourhood Plan area

⁶⁵ <https://www.cornwall.gov.uk/health-and-social-care/public-health-cornwall/joint-strategic-needs-assessment-jsna/community-and-health-based-profiles/community-network-health-profiles/>

considering themselves to have ‘bad health’ or ‘very bad health’ is 6.7%, greater than the totals for Cornwall (6.3%) and the South West of England (5.2%), and for England (5.5%). Interestingly a higher proportion in Looe considered themselves to have ‘fair health’ (18.9%) than in Cornwall (14.9%), the South West (13.4%) and England (13.1%).

Figure 33: Disability 2011

	LOOE	CORNWALL	ENGLAND	SOUTH WEST
DAY-TO-DAY ACTIVITIES LIMITED A LOT	11.1%	10.0%	8.3%	8.3%
DAY-TO-DAY ACTIVITIES LIMITED A LITTLE	13.4%	11.4%	9.3%	10.2%
DAY-TO-DAY ACTIVITIES NOT LIMITED	75.4%	78.6%	82.4%	81.6%

Source: Census 2011: ‘Long-term Health Problem or Disability 2011’ (Table QS303EW)

A.217 The total percentage of residents within the Neighbourhood Plan area who report that their activities are limited by a form of disability is higher than the regional and national proportions shown in Figure 33. There are a greater number of residents within the Neighbourhood Plan area who report that their activities are limited ‘a lot’ (11.1%) in comparison to Cornwall (10%), the South West of England (8.3%) and England (8.3%). Overall, 75.4% of residents in the Neighbourhood Plan area report that their activities are ‘not limited’, less than the totals for the South West of England (81.6%) and England (82.4%) but broadly similar to Cornwall (78.6%).

Summary of Future Baseline

A.218 Health and wellbeing levels within the Neighbourhood Plan area are generally lower than regional and national averages with a lower percentage of residents reporting ‘good’ or ‘very good’ health.

A.219 A growing and ageing population within the Neighbourhood Plan area may increase the reported cases of disability, further reduce the levels of good health, and place future pressures on health services in the wider area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing.

A.220 Obesity is also seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

Key Sustainability Issues

A.221 Some 74.4% of residents in the Neighbourhood Plan area consider themselves as having ‘very good health’ or ‘good health’, lower than for Cornwall (78.8%), and much lower than the South West of England (81.4%) and England (81.4%).

A.222 A higher proportion of residents within the Neighbourhood Plan area report that their activities are limited in some way compared to regional and national averages.

8.1. Within the Looe - Liskeard CNA, 30% of children measured in the National Child Measurement Programme were found to be overweight or obese, 30.2% of adults are classified as inactive, with a further 15.1% classified as insufficiently active.

TRANSPORTATION

Policy Context

A.223 **European Common Transport Policy**⁶⁶ and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

A.224 **The National Planning Policy Framework (NPPF)** includes the following provisions:

- *‘Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
 - i. The potential impacts of development on transport networks can be addressed
 - ii. Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised
 - iii. Opportunities to promote walking, cycling and public transport use are identified and pursued
 - iv. The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account
 - v. Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.’*
- *‘Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.’*

A.225 **‘Connecting Cornwall 2030’** is the third Local Transport Plan (LTP) for Cornwall⁶⁷. The plan is a strategic policy tool through which the council exercises its responsibilities for planning, management and the development of transport in the county. The vision of the plan is that by 2030 ‘transport in Cornwall will be excellent, with our transport system connecting people, communities, businesses and services in a way that is reliable, efficient, safe, inclusive and enjoyable’. In order to achieve this goal, the LTP is supported by implementation plans that cover 3-4 year periods up until 2030, with the most recent plan covering the period 2015-2019.

A.226 **Cornwall Local Plan: Strategic Policies**, Objective 8 within key theme number 3 aims to ‘promote development that contributes to a healthy and safe population by providing for opportunities for walking and cycling’. Policy 27 ‘Transport and accessibility’ is directly relevant to the Transportation SEA theme.

Summary of Current Baseline

Rail Network

⁶⁶ <http://www.europarl.europa.eu/factsheets/en/sheet/123/common-transport-policy-overview>

⁶⁷ <http://www.cornwall.gov.uk/transport-and-streets/transport-policy/local-transport-plan-connecting-cornwall-2030/connecting-cornwall-2030-strategy/>

A.227 The Looe NDP Designated Area enjoys the benefit of being the terminal for the Looe - Liskeard Branch Line, which provides regular services to Liskeard, where connections into the national rail network are easily available, providing services to major regional centres such as Plymouth and Truro, and also to London, the Midlands, Northern England and Scotland. Connections with other main line services can be made at Plymouth.

Bus Network

A.228 The Designated Area also has several local bus services. Route 72 is from Plymouth to Polperro via Saltash, St. Germans and Looe and route 73 is from Liskeard to Pelynt via St. Keyne, Duloe and Looe. These provide reasonably regular services connecting Looe to major destinations at Plymouth and Liskeard, and also to the nearby villages outside the area. Route 172 provides a daily service linking education centres. However, bus services within Looe are less good with poor connections between the housing on the higher land at East Looe and the Town Centre.

Road Network

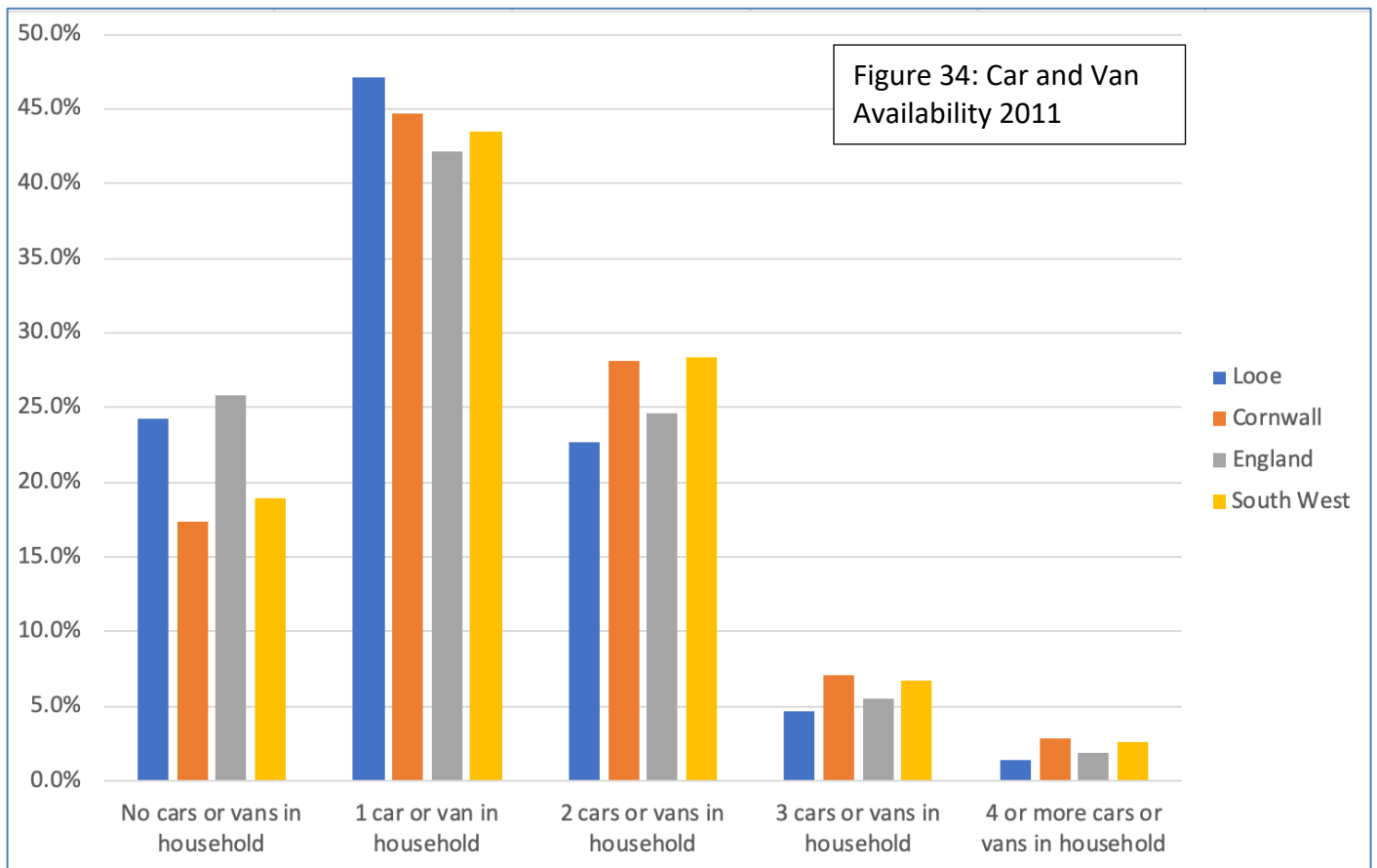
A.229 The principal road route into Looe is via the A387/A374 or B3253/A374 which connects to the A38 trunk road at Trerulefoot, giving access to Plymouth and beyond. Locally access to Liskeard is via the B3254 or lesser quality C roads. These roads are quite long and have difficult vertical and horizontal geometry in several locations, The relative difficulty of accessing Looe was one of the reasons why the branch rail line was retained. These routes can become congested at peak tourism periods and therefore they are identified on the County level Sensitive Traffic Route assessment as being 'seasonally sensitive'. (A387 is also sensitive at commuter periods). Within the Designated Area the local roads are almost universally narrow and with poor geometry. The particularly constrained town centre is included in the County level Sensitive Traffic Route assessment. The nearest motorway is the M5 which begins at Exeter.

Cycle and Footpath Network

A.230 The Public Rights of Way network serving the Neighbourhood Plan area is limited inland, although the coastal footpath walks are good and generally very well maintained. There are currently no official National Cycle Routes within the Neighbourhood Plan area, and no cycle lanes,

Availability of Cars and Vans

A.231 Based on the 2011 census data presented in Figure 34, 75.8% of households in the Neighbourhood Plan area have access to at least one car or van, which is significantly less than the percentages for Cornwall (82.7%), the South West of England (81.1%) and England (74.2%). The percentage of households in the Neighbourhood Plan area with access to at least two cars or vans (28.6%) was much less than the total for Cornwall (38.0%), the South West of England (37.6%) and England (32.0%).



Source Census 2011: “Car or Van Availability 2011”, (Table QS416EW)

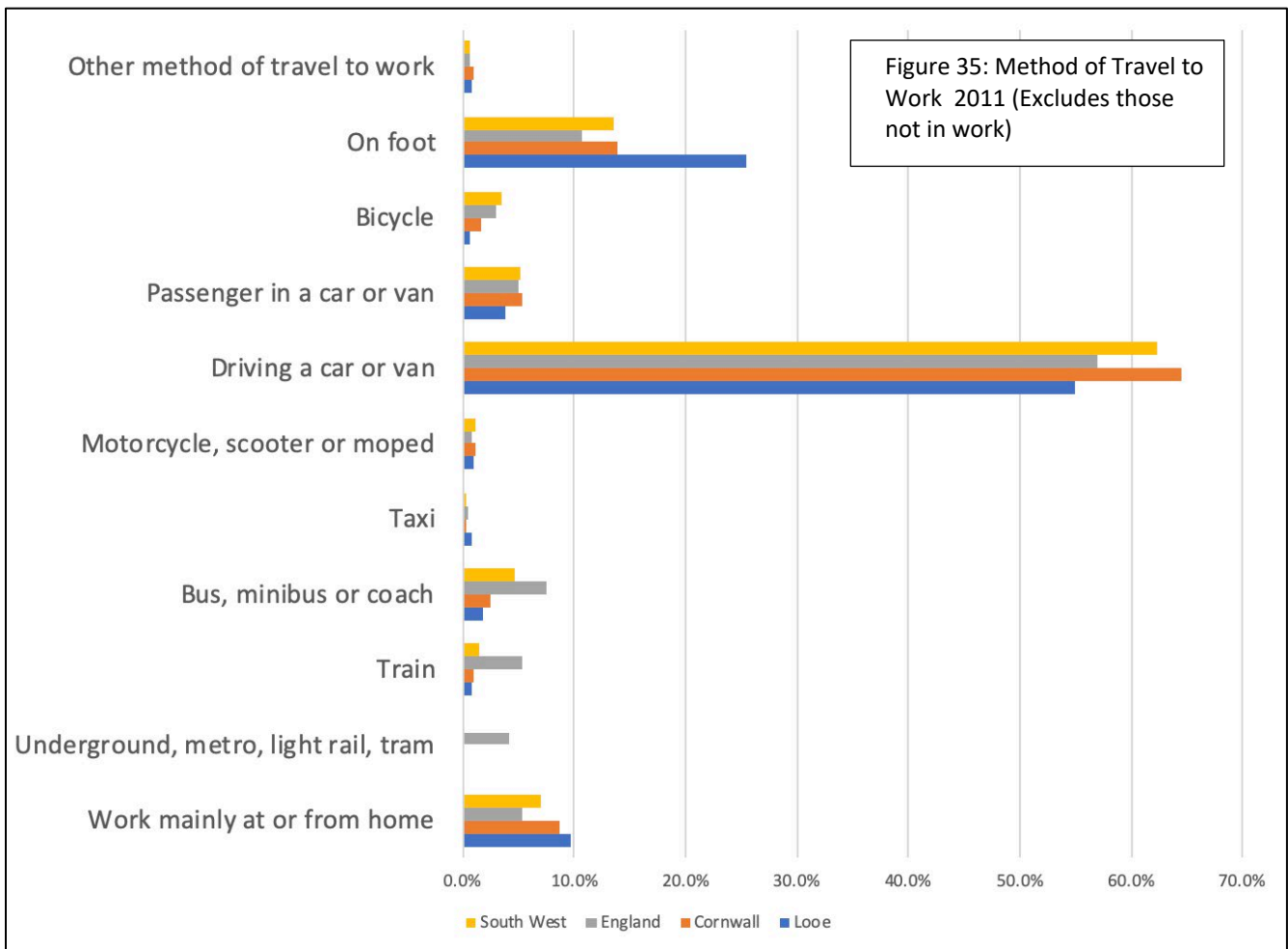
Travel to Work

A.232 As shown in Figure 35, the most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van (55.0%) which is less than Cornwall (64.5%), the South West of England (62.3%), and England (57.0%). A lower percentage of residents in the Neighbourhood Plan catch a train, bus, minibus or coach to work in comparison to the regional and national trends, but in contrast, a higher proportion of employed residents walk to work (25.5%) compared to than Cornwall (14%), the South West of England (13.6%), and England (10.7%). A higher proportion work mainly at or from home as well.

Summary of Future Baseline

A.233 A continued reliance on the private car is highly likely within the Neighbourhood Plan area, particularly given the rural nature of Looe NDP area. Residents are likely to continue to travel outside of the Plan area to access a wider range of services and facilities, including at Liskeard, Truro and Plymouth. Equally, the number of car borne visitors to Looe can be expected to be maintained, or possibly increase as a result of leaving the EU. This will continue to create seasonal congestion and contribute to green-house gas emissions.

A.234 New development has the potential to increase traffic and lead to additional congestion issues within the Neighbourhood Plan area. This is particularly significant in the local context, due to the pressures from narrow roads, steep incline, vehicle type and the stop-start effect of congestion at certain periods.



Source: Census 2011: 'Method of Travel to Work 2011' (Table QS701EW)

Key Sustainability Issues

- A.235 75.8% of households in the Neighbourhood Plan area have access to at least one car or van, which is significantly less than the percentages for Cornwall (82.7%), the South West of England (81.1%) and England (74.2%).
- A.236 The percentage of households in the Neighbourhood Plan area with access to at least two cars or vans (28.6%) was much less than the total for Cornwall (38.0%), the South West of England (37.6%) and England (32.0%).
- A.237 the most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van (55.0%) which is less than Cornwall (64.5%), the South West of England (62.3%), and England (57.0%).
- A.238 A lower percentage of residents in the Neighbourhood Plan catch a train, bus, minibus or coach to work in comparison to the regional and national trends, and a higher proportion of employed residents walk to work (25.5%) compared to than Cornwall (14%), the South West of England (13.6%), and England (10.7%).
- A.239 A higher proportion work mainly at or from home as well.
- A.240 There are good public transport links to locations outside of Looe but within Looe the links are less good.

APPENDIX 2: LOCAL LANDSCAPE CHARACTER ASSESSMENT

http://www.futurelooe.town/plan_evidencebase.php?id=42

APPENDIX 3: URBAN EDGE ASSESSMENT

http://www.futurelooe.town/plan_evidencebase.php?id=51

APPENDIX 4: HERITAGE ASSESSMENT

http://www.futurelooe.town/plan_evidencebase.php?id=62

APPENDIX 5: SHORTLISTED SITES SUSTAINABILITY APPRAISAL

Assessment Criteria:	Cell References & Criteria Ratings						
	1	2	3	4	5a	8	10
1: Climate Factors							
2: Waste							
3: Minerals and Geodiversity							
4: Soil							
5: Air							
6: Water							
7: Biodiversity							
8: Landscape LLCA							
9: Maritime							
10: Historic Environment	See Heritage Assessment						
11: Design							
12: Social Inclusion							
13: Crime & Anti-Social Behaviour							

Assessment Criteria:	Cell References & Criteria Ratings						
	1	2	3	4	5a	8	10
14: Housing	Yellow	Green	Green	Green	Yellow	Yellow	Yellow
15: Health, Sport and Recreation	Green	Green	Green	Green	Yellow	Green	Yellow
	Green	Green	Green	Green	Green	Yellow	Green
	Green	Green	Green	Green	Orange	Orange	Green
16: Economic Development, Regeneration and Tourism	Green	Green	Green	Green	Green	Green	Green
	Green	Green	Green	Green	Green	Green	Green
	Green	Yellow	Yellow	Yellow	Yellow	Green	Yellow
17: Education and Skills	Green	Green	Green	Green	Green	Yellow	Red
	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Orange
18: Transport and Accessibility	Green	Green	Green	Yellow	Green	Green	Orange
	Green	Green	Green	Green	Green	Green	Green
	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Orange
19: Energy	Green	Green	Green	Green	Green	Green	Green
20. Site partially or wholly identified on Cornwall's Strategic Housing Land Availability	Green	Green	Green	Red	Red	Red	Green

APPENDIX 6: SWOT ANALYSIS TO IDENTIFY SITE OPTIONS.

Assessment	Cell References & Criteria Ratings						
	1	2	3	4	5a	8	10
1. Evidence of landowner/ developer interest on part or the entire Site? **	Nil	Pre app submitted in April 2018 for affordable-led housing development comprising up to 50 dwellings on site within cell r/o Bay Down	Outline app for 100 dwellings (50% affordable housing, 50 bed affordable Care / Extra Care Home (PA17 / 05908. Refused 11/2017.	Pre application advice for retail food-store (2323sq.m) plus petrol filling station, car parking, service yard and major landscaping in 2012.	Nil	Large cell with multiple ownership, mainly CC and WLTT, both of whom have ambition to see regeneration activity on the cell.	Pre-app for unspecified development in May 2012.

Local Neighbourhood Development Plan - Urban Edge Assessment November 2018

Assessment Criteria:	Cell References & Criteria Ratings						
	1	2	3	4	5a	8	10
2. Site Area (Hectares)	15 Ha	9.7 Ha	4.6 Ha	3.4 Ha	2.7 Ha	6.5ha	18 Ha
3. Potential Site Capacity (No. of dwellings/sqm of employment space)***	315	205	100	70	55	Not appropriate to assess the potential as residential will be only a small element of any scheme which comes forward.	378
4. SWOT Analysis: Site Strengths	Lower parts of cell adjacent to urban area less obvious from sea and long coastal views. Also have opportunities for access and are close to local facilities. Higher parts have better topography for development (and also OS). W of cell close to bus route.	Lower parts of cell adjacent to urban area. Also have opportunities for access and are close to local facilities. Higher parts have better topography for development (and also OS). W of cell close to bus route.	Close to facilities and main road in Barbican area. W of cell close to bus route.	Has moderate landscape capacity for development. On bus route.	Has high landscape capacity for development, and mostly Grade 4 land. Accessible through recently completed estate and potential for inclusion of green space.	Area to W underused and plenty of potential for regeneration and intensification.	Good aspect for solar gain on S of cell.

Assessment Criteria:	Cell References & Criteria Ratings						
	1	2	3	4	5a	8	10
5. Analysis: Site Weaknesses	Higher parts are very exposed, and comprise mostly Grade 2 agric land, whilst lower parts very steep. Overall limited landscape capacity to accommodate development.	Higher parts very exposed to long distance views from E, comprises entirely Grade 2 land. Good access possible. Overall limited landscape capacity to accommodate development.	Very exposed hilltop site entirely Grade 2 land with a history of refusals. Overall limited landscape capacity to accommodate development.	Rather separated away from rest of settlement, with walk to facilities long and steep. Comprises Grade 3 agricultural land. Moderate landscape capacity to accommodate development.	Aspect not good for solar gain. Otherwise accessible and has high landscape capacity to accommodate development	Multiple restrictions on most of cell restrict potential development opportunities to W and S edges.	Largely Grade 3 agricultural land, poor aspect for solar gain on N of cell. Low moderate landscape capacity for development. Cell only accessible via northern route from Polperro Road over steep terrain, or via The Garrick, or to the S by West Looe Hill. Overall limited landscape capacity to accommodate development.
6. Analysis: Site Opportunities	Opportunity to allocate a smaller cell at lower W end of site, adjacent to existing and able to gain access from Hay Lane, where the balance of grade 2 agric land is less.	Opportunity to allocate smaller site to W of cell, adjoining Bay Down (as per pre-app referred to above). However somewhat more exposed compared to potential site in Cell 1.	It may be possible to add a very small site adjoining the small pumping station, providing there is strong hedge planting on the N and E boundaries. Given adjacent uses should be for employment use .	Nil	Potentially an extension to the Barrett estate, providing additional residential development with little risk of encouraging release of adjacent land.	Significant opportunities for regeneration to S and W, to support relocation and release of sites elsewhere in town centre, new developments to advance sustainable tourism, etc	Due to access difficulties, it is hard to perceive any opportunities with this cell.

Assessment Criteria:	Cell References & Criteria Ratings						
	1	2	3	4	5a	8	10
7. Analysis: Site Threats	Further extension N and E would be enabled in the long term. Access from narrow road with poor geometry.	Further extension N and E would be enabled in the long term.	Risk that a larger site could be encouraged, or an incremental snipping away of the boundary that would lead to poor visual appearance and inadequate infrastructure.	Residential development here could lead to a relatively isolated community more reliant on cars.	Concerns about drainage and possible impact on land stability in Looe Valley have been reported.	Little in way of threat other than from loss of car parking and impact on tourism trade.	Development on this cell would have serious landscape impacts, unless restricted to the lower S side, in which case there would be a significant threat to highway conditions on West Looe Hill.
8. Conclusion	Small site of approx. 2.1 ha possible (see Map below). Could accommodate about 45 units. SITE 1	Small site of approx. 2.2 ha possible (see Map below). Could accommodate about 25 units. SITE 2	Small employment site of under 1 ha (c.3,500 sqm of units) possible but only with strong screen planting. SITE 4	Nil	An opportunity for a rounding-off development, subject to investigation of drainage concerns. Could accommodate around 25 units and buffer green space to protect adjacent woodlands. SITE 3	A significant opportunity to aid the regeneration of Looe, may also be able to include a small amount of residential. Scale of potential and constraints means that a careful master-planned approach is essential.	Nil

Policy Reference	Assessment Considerations
POLICY E 6 - REDEVELOPMENT OF LOOE FIRE STATION	<p>Proposed Use: Residential or small live/work units or commercial/retail taking in to account Policy E 6.</p>
	<p>Climate Change: Located at the core of West Looe town centre amongst various small scale retail services, on roads linking to residential areas. Aspect allows some degree of solar gain and use of renewable energy technologies, but this is constrained location in Conservation Area and proximity to a concentration of listed heritage assets. Entire cell within Flood Zone 3, set in area of extensive hard surfaces, which would constrain options for sustainable drainage, although sustainable building design could lead to an improved environmental performance though sustainable sourcing and reducing emissions in comparison to current circumstances. Development of this site in accordance with Policy E 6 would have a marginal positive effect on this SEA objective.</p> <p>Biodiversity: Is in Plymouth Sounds and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA) 'Zone of Influence' Small scale development here is not considered to have a likely significant effect on the European sites by virtue of the mitigation of recreational impacts from new development provided through Cornwall Local Plan policy 22. No direct negative biodiversity effects identified. Sustainable building design could lead to improved drainage which may help support improvements in water quality in Looe Bay. Development of this site in accordance with Policy E 6 would have a marginal positive effect on this SEA objective.</p> <p>Landscape: This site was not assessed in the LLCA, but in view of its status as Previously Developed Land some development may be permitted in accordance with NPPF guidance. The 1960's fire station building on this site detracts from the historic townscape within the Conservation Area. Replacement with a building with a design that is informed by its setting and makes a contribution to the local public realm, for example be restoring the 'town square' open space, would provide a significant improvement. Development of this site in accordance with Policy E 6 would have a positive effect on this SEA objective.</p> <p>Historic environment: The 1960's fire station building on this site detracts from the historic townscape within the Conservation Area and from the setting of several nearby heritage assets. Redevelopment of the site of a layout, design, density, scale and massing which is not informed by its historic and landscape character and an understanding of the wider historic context of Looe would continue and even worsen the harm on the setting and significance of the surrounding heritage assets and medieval settlement. Redevelopment of the site under the terms of NDP Policies E 6 and TC 3 would provide an opportunity to reverse this harm by the creation of a building of high quality that complements the setting and protects the significance of the nearby heritage assets. Development of this site in accordance with Policy E 6 would have a positive effect on this SEA objective.</p> <p>Land, Soil and Water Resources: The entire area is Previously Developed Land, so focusing some development here will save using higher quality greenfield land elsewhere. Although the extensive hard surfaces within the flooding area and presence of heritage structures could impede sustainable design and drainage, replacement of existing drainage arrangements through more sustainable building as proposed could still make a contribution to the minimization of water consumption and support improvements to bathing water quality. Development of the site on these terms would have positive effect on this SEA objective.</p> <p>Population and Community: Residential or small live/work units or commercial/retail development on this site in accordance with Policy E 6 would provide additional housing choice, business and job opportunities, and community facilities. In addition, the enhancement of the public realm and the 'town square' area would create space for events and social interaction,</p>

	<p>contributing to community cohesion. Development of the site on these terms would have positive effect on this SEA objective.</p> <p>Health and Wellbeing: Looe Community Fire Station was built in the 1960s on this site within an area with high risk of flooding from rivers or the sea, which restricts its usefulness should flood conditions occur. Replacement in a location less constrained by flood risk would allow more secure and rapid emergency deployment to the now expanded community it serves (including Polperro) and be able to offer improved premises that incorporate modern equipment and work areas, supporting an improved service. Policy E 6 is intended to help enable this initiative. The site is centrally located alongside other services and may encourage more healthy walking trips. Development of the site in accordance with Policy E 6 would therefore have positive effect on this SEA objective.</p> <p>Transportation: Development as proposed under NDP Policy E 6 would allow for the provision of new services at a centrally located and highly sustainable location on a bus route and encourage modal shift to both walking and public transport. Careful layout of the ‘town square’ area would facilitate improved pedestrian safety. Development of the site on these terms would have positive effect on this SEA objective.</p>
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3. Policy E 7 - FUTURE COMMUNITY SERVICE RESERVE AT EAST LOOE POLICE STATION SITE
Proposed Use: Emergency Services Centre/Railway Platform Extension

	<p>Climate Change: Located at a widely accessible location on the main road from East Looe town centre to Liskeard, immediately to the south of Looe Railway. Proposal would support extension of Looe Station to increase rail capacity and encourage improved use of the Looe Valley Branch Line, supporting modal shift in both tourist and commuter traffic. Aspect allows some degree of solar gain and use of renewable energy technologies, but this is constrained location in Conservation Area. Entire cell within Flood Zone 3, which would constrain options for sustainable drainage, although sustainable building design could lead to an improved environmental performance though sustainable sourcing and reducing emissions in comparison to current circumstances. Development of this site in accordance with Policy E 6 would have a positive effect on this SEA objective.</p> <p>Biodiversity: Is in Plymouth Sounds and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA) ‘Zone of Influence’ Small scale development here is not considered to have a likely significant effect on the European sites by virtue of the mitigation of recreational impacts from new development provided through Cornwall Local Plan policy 22. No direct negative biodiversity effects identified. Sustainable building design could lead to improved drainage which may help support improvements in water quality in Looe Bay. Development of this site in accordance with Policy E 6 would have a marginal positive effect on this SEA objective</p> <p>Landscape: This site was not assessed in the LLCA, but in view of its status as Previously Developed Land some development may be permitted in accordance with NPPF guidance. The 1970/80’s police station building on this site does not detract from the historic townscape within the Conservation Area, but replacement with a building with a design that is better informed by its setting would provide some improvement. Development of this site in accordance with Policy E 6 would have a positive effect on this SEA objective.</p> <p>Historic environment: The design of the Police Station occupying the site was informed by the historic setting but opportunities to reflect the former use of the site as a railway station were not taken. The rest of the site is car park and has little relationship with the settings and significance nearby heritage assets. A redevelopment of the site of a layout, design, density, scale and massing which is not informed by the historic and landscape character of site and an understanding of the wider historic context of Looe would continue the impact and harm on the setting and significance of the surrounding heritage assets and the character of the medieval settlement as the current building and use causes. Redevelopment of the site in accordance with Policy E 7 would provide an opportunity to create a building of high quality that complements the setting and protects the significance of the nearby heritage assets. Development of the site on these terms would have positive effect on this SEA objective.</p> <p>Land, Soil and Water Resources: The entire area is Previously Developed Land, so focusing some development here will save using higher quality greenfield land elsewhere. Although the</p>
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	<p>extensive hard surfaces within the flooding area could impede sustainable design and drainage, replacement of existing drainage arrangements through more sustainable building as proposed could still make a contribution to the minimization of water consumption and support improvements to bathing water quality. Development of the site on these terms would have positive effect on this SEA objective.</p> <p>Population and Community: Policy E 7 proposes the redevelopment of the police station site to provide a new improved Blue Light Centre accommodating Police and Fire & Rescue services and for the extension of the platform of Looe station so that 3 or 4-carriage trains can be accommodated, which would enhance access to services and to sustainable transport options. Development of the site on these terms would have positive effect on this SEA objective.</p> <p>Health and Wellbeing: Redevelopment as proposed under Policy E 7 will improve the viability and reach of emergency services and thereby contribute to improved community safety. Development of the site on these terms would have positive effect on this SEA objective.</p> <p>Transportation: Redevelopment as proposed under Policy E 7 would include an extension of Looe Railway Station Platform so that it can accommodate up to 4 carriage trains, allowing for increased capacity and that the existing level of public car-parking is maintained thus supporting modal shift in both tourist and commuter traffic. It also requires a drive thru/dual access layout to facilitate emergency vehicle use which will mitigate any road safety considerations resulting from the initiative. Development of the site on these terms would have positive effect on this SEA objective.</p>
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E 8: REDEVELOPMENT OF POLVELLAN HOUSE
Proposed Use: Appropriate uses which could be designed to take in to account the various heritage, access, landscape, and planning policy constraints. Policy E8

	<p>Climate Change: Located above the town’s major tourism car park, and close to footpaths leading to town centre. Dual aspect /varying gradient allows some degree of solar gain and use of renewable energy technologies, but this is constrained by large trees that would mostly need to be retained for landscape and heritage reasons. Entire cell is outside of Flood Zone 3a or 3b. Topography and tree retention could impede sustainable design and drainage. However, retention of trees will retain their role as natural carbon sink. Development of this site in accordance with Policy E 8 would have a marginal positive effect on this SEA objective.</p> <p>Biodiversity: Is in Plymouth Sounds and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA) ‘Zone of Influence’ Small scale development here is not considered to have a likely significant effect on the European sites by virtue of the mitigation of recreational impacts from new development provided through Cornwall Local Plan policy 22. Site is an important part of the green infrastructure at the confluence of the East and West Looe valleys. As a largely undisturbed deciduous and broadleaved woodland it is likely to be habitat rich. It is also noted for seabird nesting (Herring Gull) and close to the south-east tip of the site is a sweet chestnut registered as a veteran tree, whilst five trees located at the western end of the site are the subject of a Tree Preservation Order. Development of this site in accordance with NDP Policies E 8, HB 1 (Habitat and Biodiversity) and HB 2 (Woodlands, Trees, Cornish Hedges and Hedgrows) would have a positive effect on this SEA objective as it requires that any proposals for the site should respond to and be informed by these factors and enhance biodiversity.</p> <p>Landscape: This site was not assessed in the LLCA, but in view of its status as Previously Developed Land some development may be permitted in accordance with NPPF guidance. The western half of the Polvellan House site is identified as a Local Green Space in NDP Policy PGS 1 where development that would harm the openness, setting or special character will not be supported unless there are very special circumstances. The Cornwall Industrial Settlements Initiative says that that the relict woodland and ornamental grounds of Polvellan House are an important visual element in the setting of West Looe. In the Looe Conservation Area Management Plan, the grounds of Polvellan House are named as ‘important ornamental grounds’ whilst the Looe Conservation Appraisal describes Polvellan as ‘landscaped grounds of outstanding importance’, which should be ‘protected, enhanced and perhaps be made more</p>
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accessible'. Development of this site in accordance with Policy E 8 and TC 10 (Landscape and Heritages Views and Vistas) would help achieve these aims, whilst improving a derelict site at a key point of the landscape on the entrance to the Town's main tourism car park. It assessed that this would have a **positive effect** on the "Landscape' SEA objective.

Historic environment: Redevelopment of the site involving the complete loss of the building, or high-density development in the grounds, or designs which do not reflect its architectural characteristics would harm the setting and significance of the Conservation Area and the range of important heritage assets related to the Buller family. Loss of trees, or excessively tall development, would have a detrimental impact on the setting of the building and on the character and appearance of the Conservation Area. However, proposals to redevelop the site that are demonstrably informed by its historic and landscape character, and an understanding of its role in the wider historic context of Looe, in accordance with NDP Policies E 8, TC 3 on design and local distinctiveness, PSG 1 on Local Green Spaces and Cornwall Local Plan Policy 24, would avoid such harm and introduce potential mitigation/enhancement measures such as improving public access, explaining the importance of the site to the public, and restoring an historic asset within the Conservation Area. It assessed that this would have a **positive effect** on the "Historic Environment' SEA objective.

Land, Soil and Water Resources: The entire area is Previously Developed Land, so focusing some development here will save using higher quality greenfield land elsewhere. Although site topography and the need for tree retention could impede sustainable design and drainage, replacement of existing drainage arrangements through more sustainable building as proposed could still make a contribution to the minimization of water consumption and support improvements to bathing water quality. Development of the site on these terms would have **positive effect** on this SEA objective.

Population and Community: It is not considered that a formal NDP allocation for specific uses would be appropriate as potential developers need to have flexibility in finding a viable use for the site. Provision of residential or tourism accommodation, or local employment or leisure/community facilities would contribute to the improvement of housing choice, create business and job opportunities, and possibly provide new local facilities which overall could encourage and promote social cohesion, well-being and prosperity. Development of the site as proposed would have **positive effect** on this SEA objective.

Health and Wellbeing: Provision of residential or tourism accommodation, or local employment or leisure/community facilities would promote accessibility to such provision for all age groups. Development in accordance with NDP Policy E 8 would also enhance the provision of community access to green infrastructure and promote the use of healthier modes of travel. Therefore, the development of this site as proposed would have **positive effect** on this SEA objective.

Transportation: Development as proposed under NDP Policy E 8 would minimize traffic implications and encourage repair and re-use of existing (closed) footpath routes. Being located within reasonable walking distance of the town centre modal shift to more sustainable forms of travel may be encouraged. Therefore, the development of this site as proposed would have **positive effect** on this SEA objective.