

Strategic Environmental Assessment (SEA) for the St Stephen-in-Brannel Neighbourhood Plan

Environmental Report to accompany the submission 'Regulation 16 version' of the neighbourhood plan

St Stephen-in-Brannel Parish Council

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Quality information

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Table of Contents

Non	-Technical Summary (NTS)	i
Intro	duction	1
1.	Introduction	2
2. seel	What is the St Stephen-in-Brannel Neighbourhood Plan king to achieve?	4
3.	What is the scope of the SEA?	
Part	1: What has plan-making/ SEA involved to this point?	9
4.	Introduction (to Part 1)	10
5.	Establishing alternatives	11
6.	Assessing the reasonable alternatives	13
7.	Establishing the preferred approach	16
Part	2: What are the SEA findings at this stage?	18
8.	Introduction (to Part 2)	19
9.	Appraisal of the St Stephen-in-Brannel Neighbourhood Plan	
10.	Conclusions and recommendations	
Part	3: What are the next steps?	27
	Next steps and monitoring	
Арр	endix A Regulatory requirements	29
App	endix B Scoping information	32

Non-Technical Summary (NTS)

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging St Stephen-in-Brannel Neighbourhood Development Plan (NP).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. The St Stephen-in-Brannel NP has been screened in by Cornwall Council as requiring a full SEA process.

The St Stephen-in-Brannel NP is being prepared by the Parish Council in the context of the Cornwall Local Plan (2016). Once 'made' the St Stephen-in-Brannel NP will have material weight when deciding on planning applications, alongside the Cornwall Local Plan.

The Neighbourhood Plan is at an advanced stage of preparation, with this SEA Environmental Report, accompanying the Submission version of the Neighbourhood Plan.

Structure of this Environmental Report

SEA reporting essentially involves answering the following questions in turn:

- 1. What has plan-making / SEA involved up to this point?
 - including in relation to 'reasonable alternatives'.
- 2. What are the SEA findings at this stage?
 - i.e. in relation to the submission plan.
- 3. What happens next?

Each of these questions is answered in turn within a discrete 'part' of the Environmental Report and summarised within this NTS. However, firstly there is a need to set the scene further by answering the questions 'What is the Plan seeking to achieve?' and 'What's the scope of the SEA?'

What is the Plan seeking to achieve?

The St Stephen-in-Brannel NP has produced the following vision statement:

'Recognise and respect the distinctive characteristics of the Parish community, including its individual villages and settlements, whilst providing for the future success and ambitions of all who reside within it, as a key part of the 'Green Capital' of Cornwall.'

In order to achieve this Vision, a number of strategic objectives have been adopted, grouped under themes including housing, business and employment, natural environment and community facilities, recreation, and open space.

What is the scope of the SEA?

The scope of the SEA is reflected through relevant themes, objectives, and assessment questions, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment. The SEA Framework provides a methodology and consistent approach for the appraisal of the St. Stephen-in-Brannel NP.

A summary framework is presented below, and a full framework which includes assessment questions is provided within Appendix B of the main Environmental Report.

SEA theme	SEA objective
Biodiversity and geodiversity	Protect and enhance biodiversity and geodiversity within and surrounding the neighbourhood area.
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility and connectivity, reducing deprivation, and supporting cohesive and inclusive communities.

Plan-making / SEA up to this point

An important element of the required SEA process involves assessing 'reasonable alternatives'. Part 1 of the Environmental Report explains how work was undertaken to develop and assess 'reasonable' alternative approaches for the St Stephen-in-Brannel NP.

Specifically, Part 1 of the report -

Chapter 4: Explains the process of establishing the reasonable alternatives;

Chapter 5: Presents the outcomes of assessing the reasonable alternatives; and

Chapter 6: Explains reasons for developing a preferred option, in light of the assessment.

Establishing the alternatives

Chapter 5 of the main Report sets out the strategic and local context for the Neighbourhood Plan, and explains how the Steering Group came to the conclusion that the Neighbourhood Plan should not seek to allocate land for housing or employment uses.

In terms of reasonable alternatives, the Steering Group has been keen to explore the need for some market flexibility and for rural affordable housing, in ways consistent with the Cornwall Local Plan policy framework. The following two broad options have therefore been considered relating to the Neighbourhood Plan's development strategy:

Option A: Restrict development to within settlement boundaries

Option B: Take a less restrictive approach to development

Assessing the alternatives

Chapter 6 of the main Report carries out an assessment of Option A and Option B against the SEA Framework. To support the assessment findings, the options have been ranked in terms of their sustainability performance against the relevant SEA theme. The assessment provided within Table 6.2 concludes that Option A is best performing against both SEA themes.

Developing the preferred approach

Chapter 7 sets out the Steering Group's reasons for selecting the preferred approach for the Neighbourhood Plan.

Assessment of the St Stephen-in-Brannel Neighbourhood Plan

Chapter 8 of this Report includes an assessment of the Neighbourhood Plan. The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see Table 3.1) as a methodological framework. The following conclusions and recommendations have been made:

Conclusions

The assessment has concluded that the NP is likely to lead to significant positive effects in relation to the Community and Wellbeing (including Transport) SEA theme. This reflects the focus of the NP on safeguarding and enhancing community infrastructure, supporting sustainable growth and functionality of settlements within the parish. The NP facilities the delivery of housing which is appropriate in scale and location to compliment and support existing communities and meets local needs; and supports economic vitality by enhancing the prospects for employment locally.

Positive effects also include improved access to green space and active travel networks, supporting connectivity and engagement with nature. The NP also seeks to strengthen the broader sustainable transport links within the parish to reduce the impact of traffic on its communities.

Minor positive effects are concluded in relation to the Biodiversity SEA theme, linked to the identification and protection of a network of 'green infrastructure' within the parish. NP policy provisions seek to retain and extend habitats, support connectivity and nature recovery networks, and deliver net gain. This builds upon higher level policy including the Cornwall Design Guide, Cornwall Climate Emergency DPD, Cornwall's Environmental Growth Strategy, and Cornwall Biodiversity Action Plan; amongst others.

Recommendations

As discussed at length through the Neighbourhood Plan, the mandatory requirement to achieve a 10% net gain for biodiversity in planning permissions has been introduced through the Environment Act 2021. It is considered that there is the potential for Neighbourhood Plan Policy NE3 to seek to exceed national requirement; for example if it were to support development where it delivered in excess of 10% net gain. This would have the potential to deliver positive effects on the baseline.

Next steps

This Environmental Report accompanies the St Stephen-in-Brannel Neighbourhood Plan for submission to the Local Planning Authority, Cornwall Council, for subsequent Independent Examination.

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.

If the Independent Examination is favourable, St Stephen-in-Brannel Neighbourhood Plan will 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 'made'. Once made, St Stephen-in-Brannel Neighbourhood Plan will become part of the Development Plan for St Stephen-in-Brannel Parish.

Introduction

1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the St Stephen-in-Brannel Neighbourhood Development Plan (NP).
- 1.2 The St Stephen-in-Brannel NP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The St Stephen-in-Brannel NP is being prepared in the context of the adopted Cornwall Local Plan (2016), the key documents of which include the Strategic Policies (2010-2030), Site Allocations Development Plan Document (DPD) and the Minerals Safeguarding DPD.
- 1.3 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. Following screening of the Plan, SEA of the St Stephen-in-Brannel NP is a legal requirement.

SEA explained

- 1.4 It is a requirement that SEA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.5 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that "identifies, describes and evaluates" the likely significant effects of implementing "the plan, and reasonable alternatives". The report must then be considered, alongside consultation responses, when finalising the plan.
- 1.6 More specifically, the Report must answer the following three questions:
 - 1. What has plan-making / SEA involved up to this point?

including in relation to 'reasonable alternatives'.

- 2. What are the SEA findings at this stage?
 - i.e., in relation to the draft plan.
- 3. What happens next?

This Environmental Report

- 1.7 This Environmental Report is published alongside the 'submission' version of the ST Stephen-in-Brannel NP, under Regulation 16 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.8 This report essentially answers questions 1, 2 and 3 in turn, to provide the required information. Each question is answered within a discrete 'part' of the report.

1.9 However, before answering Q1, two initial questions are answered to further set the scene; what is the plan seeking to achieve? And what is the scope of the SEA?

2. What is the St Stephen-in-Brannel Neighbourhood Plan seeking to achieve?

Introduction

This section considers the strategic planning policy context provided by the adopted Cornwall Local Plan, and then presents the vision and objectives of the St Stephenin-Brannel NP.

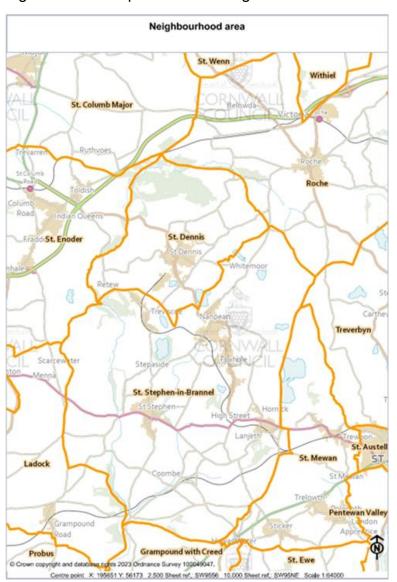


Figure 2.1 below presents the neighbourhood area.

Figure 2.1 St Stephen-in-Brannel Neighbourhood Area

Strategic planning context

- 2.1 The key document for the Cornwall Local Plan, 'Cornwall Local Plan: Strategic Policies 2010-2030'¹, was adopted in November 2016. It sets out the main planning approach and policies for Cornwall to meet the county's economic, environmental, and social needs within the plan period and work towards its aims for the future.
- 2.2 The emerging Cornwall Climate Change Development Plan Document (DPD) adds detail to the Cornwall Local Plan, aiming to help address climate change, by expanding on and replacing some Local Plan policies. The aim is to address the impacts of climate change, sitting alongside Government legislation. The DPD was due to be adopted February 2023.²
- 2.3 The Cornwall Local Plan does not set out a housing requirement for the parish, however it does indicate that St. Stephen-in-Brannel parish is within Zone 5 under Policy 8: Affordable Housing. This means any housing development that comes forward in the neighbourhood area should set out to meet an affordable housing target of 25% of the total development.
- 2.4 Neighbourhood plans form part of the development plan for Cornwall Council, alongside, but not as a replacement for, the Cornwall Local Plan. Neighbourhood plans are required to be in general conformity with the Cornwall Local Plan and can develop policies and proposals to address local placebased issues. In this way it is intended for the Cornwall 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.
- 2.5 In terms of its key objectives, the St. Stephen-in-Brannel NP seeks to support new infill, some limited rounding-off in suitable locations, 'brownfield land' development, and for unidentified affordable housing led 'exception' sites to come forward. This reflects the provisions of the Local Plan.
- 2.6 The neighbourhood plan therefore seeks to identify the potential housing numbers likely to be produced by these forms of development in the neighbourhood area, and then set local policies that will help secure the most appropriate and sustainable forms of development that suit local needs, character and environment.

¹ Cornwall Council (2016) 'Cornwall Local Plan: Strategic Policies 2010-2030' can be accessed here.

² Cornwall Council (2023) 'Cornwall Climate Emergency Development Plan Document (DPD)' can be accessed here

St Stephen-in-Brannel NP vision and objectives

2.7 The following vision statement has been developed collaboratively through a series of community engagements:

'Recognise and respect the distinctive characteristics of the Parish community, including its individual villages and settlements, whilst providing for the future success and ambitions of all who reside within it, as a key part of the 'Green Capital' of Cornwall.'

2.8 This vision sits at the heart of the NP and from it aims, objectives and planning policies have been established. A number of strategic objectives have been adopted, grouped under a range of themes including housing, business and employment, natural environment and community facilities, recreation, and open space. Further detail can be found within the St Stephen-in-Brannel NP document.

3. What is the scope of the SEA?

Introduction

3.1 The aim here is to introduce the reader to the scope of the SEA, i.e., the sustainability themes and objectives that should be a focus of the assessment of the plan and reasonable alternatives. Further information is presented in Appendix B.

Consultation

3.2 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 the Environment Agency, Historic England and Natural England. As such, these authorities were consulted earlier this year (February 2023). Scoping responses are detailed in Appendix B.

The SEA framework

3.3 The SEA scope is summarised under key themes and objectives, known as the SEA framework. The full SEA framework as broadly agreed earlier in 2023 is provided in Table 3.1 overleaf.

SEA theme	SEA objective	Assessment questions (will the proposal help to…)
Biodiversity and Geodiversity	Protect and enhance biodiversity and geodiversity within and surrounding the neighbourhood area.	 Avoid or, if not possible, minimise impacts on biodiversity and geodiversity, including internationally and nationally designated sites, following the mitigation hierarchy? Achieve biodiversity net gains and support the delivery of ecosystem services and multifunctional green and blue infrastructure networks? Support the integrity of the designated sites for biodiversity and geodiversity located within proximity to the neighbourhood area? Protect and enhance priority habitats, seminatural habitats, species, and the ecological networks connecting them? Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks? Support and promote access to and interpretation and understanding of biodiversity and geodiversity?
Community Wellbeing (including Transportation)	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility and connectivity, reducing deprivation, and supporting cohesive and inclusive communities.	 Support the delivery of high-quality and sustainable design through new residential development areas (including with respect to a mix of housing types and tenures, and affordability)? Improve the availability and accessibility of key local services and facilities? Improve and extend green and blue infrastructure networks within the neighbourhood area? Improve community access and connectivity to green and blue infrastructure networks? Avoid impacts on the quality and extent of existing areas of open space/recreational assets? Maintain and enhance the quality of life of existing residents and all sectors of the community? Encourage a shift to more sustainable and active forms of travel and enable public transport infrastructure enhancements?

Table 3.1 SEA Framework of objectives and assessment questions

Part 1: What has plan-making/ SEA involved to this point?

4. Introduction (to Part 1)

Overview

- 4.1 The aim of this part of the report is to explain work undertaken to develop and assess reasonable alternatives. Whilst work on the St Stephen-in-Brannel NP has been underway for some time, the aim here is not to provide a comprehensive explanation of work undertaken to date, but rather to discuss the evolution of the St Stephen-in-Brannel NP in association with the SEA process. More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to a particular issue that is of central importance to the plan, namely the broad location of development in the neighbourhood area.
- 4.2 Structure of this part of the report:
 - Chapter 5 explains the process of establishing reasonable alternatives
 - **Chapter 6** presents the outcomes of assessing reasonable alternatives
 - **Chapter 7** explains reasons for establishing the preferred option, in light of the assessment.

5. Establishing alternatives

Introduction

5.1 The aim here is to explain a process that led to the establishment of reasonable alternatives, and thereby present "an outline of the reasons for selecting the alternatives dealt with".

Strategic context

- 5.2 The Cornwall Local Plan: Strategic Policies document sets out, in Policy 2a, the housing targets which are to be met as a minimum through the course of the plan period (2010-2030). These are presented as targets specific to the main towns and for wider Community Network Areas (CNAs).
- 5.3 In Policy 2a Cornwall's Local Plan apportions 2,700 dwellings to be delivered in the parishes that make up the China Clay CNA. 900 of these are to be take forward through the Eco-Communities scheme at West Carclaze and Baal, which is located outside of the Neighbourhood Area. The remaining 1,800 are to be shared out amongst the Parishes in the CNA.
- 5.4 However, the Local Plan also noted that past rates of housing growth have been high in this area compared to the rest of Cornwall. The strategy therefore seeks to acknowledge these past high rates of growth and sets an approach that helps deliver a sustainable balance of market and affordable housing in the area.
- 5.5 Monitoring data supplied by Cornwall Council shows completions in the CNA (April 2021) as 1,343 dwellings, with a further 1,609 dwellings with planning permission. Within the Neighbourhood Area alone 203 dwellings were completed, of which 85 were affordable homes and 118 open market. These figures mean that the Local Plan target has already been met. Therefore in purely numerical terms, there is no outstanding housing requirement for St Stephen-in-Brannel Parish to meet during the Local Plan period (up to 2030).

Local context

- 5.6 In light of the above, and on recommendation from Cornwall Council, the Neighbourhood Plan Steering Group sought to further engage with the local community on the issue. A key question being whether the community would benefit from planning for a higher number of homes based on local circumstances.
- 5.7 Following a range of consultation events and evidence gathering, it was clear that many saw a need for specialist housing for the elderly, whilst the HomeChoice register³ indicated a need for 288 homes, with a priority need for 92 one and two bedroom dwellings. There is evidence of a continuing market demand and inward migration pressure on the local housing stock which is driving up local house prices. It was considered that new development in the

³ HomeChoice Register data (March 2022)

area would support existing facilities, but the amount of development needed to fund and support the income of new facilities would potentially be excessive.

- 5.8 In considering policy options to address these housing needs, the Steering Group has taken into account the strong community emphasis expressed in consultation on protecting that the landscape, countryside and open/green spaces and distinctive village identity were the most important issues to consider when looking at development proposals.
- 5.9 In light of the analysis undertaken, the Steering Group has concluded that the Neighbourhood Plan should not seek to allocate land for housing or employment uses. The overall level of housing growth to be delivered within the neighbourhood area has already been determined and met through recent completions and permissions. Additionally, the distribution and location of housing growth has been determined through the development management process. It is therefore considered that it would not be appropriate for the SEA to reconsider alternatives for the level and distribution of proposed growth in the neighbourhood area because, firstly, this has been established at a higher level of plan-making through the Local Plan, and secondly, the Neighbourhood Plan does not seek to deviate from this.
- 5.10 As such, it would not be appropriate for the SEA process to consider different levels of growth or alternative sites. However, it is acknowledged that there is the potential for the situation to change as a result of new evidence and the progression of the emerging new Local Plan. These elements are though outside of the scope of the current SEA process to consider; any such assessment would instead be undertaken if appropriate alongside a Neighbourhood Plan review.

Options for establishing Development Boundaries

- 5.11 Whilst there is no requirement for the Neighbourhood Plan to allocate sites for new homes or employment land, the Neighbourhood Plan Steering Group recognise that an element of new housing and employment growth in the parish will come forward during the Neighbourhood Plan period, including through windfall development.
- 5.12 As such the Steering Group has been keen to explore the need for some market flexibility and for rural affordable housing, in ways which are both consistent with the Cornwall Local Plan policy framework; and reflect the community desire to protect the landscape, countryside and open/green spaces and distinctive village identity. The following two broad options have therefore been considered relating to the Neighbourhood Plan's development strategy:
 - Option A: Restrict development to within settlement boundaries
 - Option B: Take a less restrictive approach to development
- 5.13 Option A seeks to support the continuing level of new rounding-off, infill, brownfield land development and affordable housing led 'exception' sites to come forward. This would be achieved by drawing up 'Development Boundaries' that allow for a realistic and sustainable level of growth.

5.14 Option B takes a less restrictive approach to development, allowing small scale market and affordable housing development to take place outside of the parish's established settlements.

6. Assessing the reasonable alternatives

6.1 Table 6.2 overleaf 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.

Table 6.2 Assessment of reasonable alternatives

Option A: Restrict development to within settlement boundaries **Option B:** Take a less restrictive approach to development

SEA theme	Discussion of potential effects and relative merits of options		Rank of preference	
			Opt B	
Biodiversity	The neighbourhood area is somewhat constrained in relation to biodiversity, with national and internationally designated sites falling (partially/ wholly) within the NP area. These assets are located away from the settlement core, for example St Austell Clay Pits Special Area of Conservation (SAC) is located north of Stepaside, and Crowhill Valley SSSI is located south of Trelion. It can therefore be assumed that restricting development to within and alongside the settlement boundaries (Option A) would perform most positively against this SEA theme. However, it is recognised that the significance of effects in relation to biodiversity is dependent on the design and layout of new development and the integration of infrastructure, which supports ecological resilience and connectivity in the area. As such, if all development seeks to integrate these elements, then all options could theoretically perform equally in terms of impact on biodiversity enhancement measures. Nonetheless, for the purposes of ranking the options, Option A is considered best performing as it ensures growth is directed away from designated biodiversity assets. Furthermore, growth within and alongside the settlement boundaries provides an opportunity to deliver biodiversity gains; enhancing green spaces and connecting residents with nature.	1	2	

Community wellbeing (including transportation)	Option A will help direct new development to more sustainable locations with good proximity to the built up areas of the Parish. This will in many cases enhance new residents' access to the area's local services and facilities, community infrastructure, and sustainable travel networks. This is likely to support a reduced reliance on the private vehicle, and improve active travel uptake. New development facilitated through Option B is less likely to be well integrated with existing settlements, although may be well located in terms of access to the road network. This could lead to increased reliance on the private vehicle and reduced opportunity for active travel uptake. As such the option may in some respects do less to support the vitality of existing communities, or support accessibility to local services and facilities, and may harm their viability This is of particular importance given that Treviscoe, Nanpean, and Foxhole fall amongst the 30% most deprived areas in the country (IMD 2019). However, given the relatively limited opportunities for infill development in the Neighbourhood Plan area (Option A), Option B has the potential to support larger scale development which can deliver a wider range of housing types and tenures, and potentially, community facilities/improvements and/or sustainable travel links. The Neighbourhood Plan area comprises a range of small settlements, some which lack facilities and/or have access constraints. As such, a less restrictive approach to development (Option B) could result in the delivery of new homes that are broadly well-located, and appropriate to the needs of the parish. This may do more to meet the needs of local people than Option A. There is however a level of uncertainty in this respect, as Option B outle deually lead to isolated growth, distant from the established settlements. It is also recognised that a key objective for the NP is to maintain distinctive settlement boundaries which provide a sense of community and identity throughout the parish. The potential	1	2
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7. Establishing the preferred approach

7.1 St Stephen-in-Brannel Parish Council have set out the following reasons for selection and rejection of the two reasonable alternative options assessed through the SEA.

Option A

- Will address housing needs in the same way as the Cornwall Local Plan and produce the same quantum of development possible under that Plan.
- Will match population growth to jobs availability and help ensure that accommodation is integrated with existing development, alongside existing business premises.
- Will support growth of the 'walk-in' catchment of local shops, services, leisure venues and allotments and thereby support their viability and supporting local self-sufficiency. This will help reduce the need to travel for day-to-day amenities.
- Will integrate development with the existing development and enable new residents to join in with the existing surrounding community, promoting cohesion.
- Has the potential to limit impacts from new development on heritage assets and the natural and historic landscape character, support local character, promote settlement distinctiveness, protect the much cherished views enjoyed in the Plan area, and contribute to the 'sense of place'.
- Has increased potential to support the redevelopment of previously developed land. This may help support the remediation of contaminated land.
- Will not significantly impact on the limited agricultural land in the area.
- Will help direct new development to areas with better quality roads and footpaths and the widest range of public transport links, including bus services.
- Has the potential to encourage the use of non-motorised transport modes such as walking and cycling [although this is limited by the difficult topography of St Stephen in Brannel which encourages car use].
- Will help ensure that development does not take place in areas at higher risk of flooding and ground instability taking into account the likely future effects of climate change as such areas are not likely to be included within a development boundary
- Is more likely to benefit from the availability of connections with existing drainage and water supply networks.
- The NDP evidence base, particularly the Development Boundary assessment, found that none of the Parish's settlements would be a sustainable location for significant amounts of new development.

Option B

- Could widen the range of types and tenures of housing, but only if provided if at scale.
- By being more dispersed, would be less likely to support housing need provision where it would complement and support existing communities.
- May provide a larger potential workforce and customer base, but this could outstrip job availability leading to increased economic distress and/or increased commuting to more distant workplaces.
- Is less likely to be well integrated with existing settlements and do less to support the vitality of existing local services and facilities.
- By facilitating development in open countryside, is likely to encourage development on productive agricultural land.
- May be able to deliver road infrastructure improvements and support future bus and train travel option.
- May support Individual self-sufficiency, possible in the form of 'off grid' living.
- May provide 'planning gains' that help support community self-sufficiency, but only if provided at scale.

Conclusions

- 7.2 In the range of consultation events carried out in the preparation of the NDP there was a strong desire for the unique character of the Parish, its natural environment and its villages to be conserved and little appetite amongst the community for the Plan providing for forms of development which would not help achieve these aspirations.
- 7.3 Option A best meets the NDP Vision and Objectives. It has the advantage of delivering the Cornwall Local Plan housing apportionment whilst providing the opportunity to set local policies that will help secure the most appropriate and sustainable forms of development that suit local needs, character and environment.

Part 2: What are the SEA findings at this stage?

8. Introduction (to Part 2)

Introduction

- 8.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current 'submission' version of the St Stephen-in-Brannel NP. This chapter presents:
- 8.2 An appraisal of the current version of the St Stephen-in-Brannel NP under the two SEA theme headings; and
- 8.3 The overall conclusions at this current stage and recommendations for the next stage of plan-making.

NP policies

8.4 The St Stephen-in-Brannel NP puts forward a number of policies to guide development in the Neighbourhood Plan area. These are set out in Table 8.1 below.

Table 8.1 St Stephen-in-Brannel NP policies

Policy - presented by theme

Housing

Policy H1 – Housing Mix

Policy H2 – Development Boundaries

Policy H3 – Housing Development Inside Development Boundaries

Policy H4 – Housing Development Outside Development Boundaries

Policy H5 – Rural Exception Sites for Affordable Housing

Policy H6 – Community Led Housing

Policy H7 – Housing For Older People (or those with a particular specialist housing need)

Policy H8 – Park Homes

Business and employment

Policy BE1 – Safeguarding Employment Land

Policy BE2 – Conversion to Business Use and New Business Development

Policy BE3 – Working from Home and Home Based Businesses

Policy BE4 – Farm Business Diversification

Policy BE5 – Rural and Sustainable Tourism

Community facilities, recreation and open space

Policy CF1 – Safeguarding and Enhancing Neighbourhood Community Facilities

Policy CF2 – Local Green Spaces

Policy CF3 – Key Recreation Spaces and Sports Pitches

Policy - presented by theme

Policy CF4 – Facilities For Young People

Policy CF5 – Development Infrastructure for Growth

Design and heritage

Policy D1 – Design and Development Standards

Policy D2 – Development and Heritage

Policy D3 – Design and Local Distinctiveness in the Historic Cores of Villages

Policy D4 – Sustainable Design

Policy D5 – Reconstruction or Conversion of Abandoned/Neglected Buildings

Policy D6 – Open Areas of Local Significance

The Natural Environment

Policy NE1 – Landscape

Policy NE2 – Green Infrastructure

Policy NE3 – Net Biodiversity Gain

Policy NE4 – Trees, Cornish Hedges and Hedgerows

Policy NE5 – Dark Skies

Policy NE6 – Sustainable Energy Production

Policy NE7 – Local Energy Storage

Roads, Access, and Transport

Policy RT1 – Accessibility and Transport

Policy RT2 – Conversion of Residential Garages

Policy RT3 – Future Bus and Rail

Policy RT4 – Broadband and Mobile Communications

Policy RT5 – Footways, Pedestrian Links, Public Rights of Way

Methodology

- 8.5 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see Table 3.1) as a methodological framework.
- 8.6 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable

assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.

8.7 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect 'characteristics' are described within the assessment as appropriate.

9. Appraisal of the St Stephen-in-Brannel Neighbourhood Plan

Biodiversity

- 9.1 Special Areas of Conservation (SACs) are protected sites designated under the Habitats Directive. In this regard, while outside of the neighbourhood area, the initial Habitats Regulations Assessment (HRA) screening of European designated sites (2023) identified potential for linking 'impact pathways' to the following European sites:⁴
 - St Austell Clay Pits SAC;
 - Breney Common and Goss and Tregoss Moors SAC;
 - River Camel SAC;
 - Newlyn Downs SAC; and
 - Fal and Helford SAC.
- 9.2 The following potentially linking impact pathways were identified:
 - Recreational pressure;
 - Air quality; and
 - Water quality and water resources.
- 9.3 The HRA 'Screening' assessment undertook a test of Likely Significant Effects (LSEs) of the policies provided within the St Stephen-in Brannel Neighbourhood Plan (Consultation Draft 2022). The assessment took into consideration the potential vulnerabilities of the European sites listed above, and concluded the following:
- 9.4 "The St Stephen-in-Brannel Neighbourhood Plan provides development management policy and does not in itself provide for any net new development (this is provided within the overarching Cornwall Local Plan that which has already been subject to HRA). As such, there are no realistic linking impact pathways to connect the Neighbourhood Plan to a European site. It can be concluded that no Likely Significant Effect will occur as a result of the Neighbourhood Plan, either alone or in combination."
- 9.5 Specifically, where development does come forward in the neighbourhood area, it is recognised that Cornwall Council have adopted a European Sites Mitigation Strategy SPD whereby impacts can be avoided and mitigated through financial contributions. As the SPD is an overarching strategic document, the Ste Stephen-in-Brannel Neighbourhood Plan will accord with the Cornwall European Sites SPD.

⁴ AECOM (2023) St Stephen-in-Brannel Neighbourhood Plan – Report to Inform Habitats Regulations Assessment

- 9.6 The neighbourhood area is also constrained by nationally and locally designated and non-designated biodiversity sites and features, as identified through scoping (see Appendix B). The sensitive nature of the natural environment is reflected through several NP policies which seek to 1) help limit potential effects on biodiversity assets and areas of ecological interest and 2) support the resilience of the 'network of green infrastructure' within the Parish. This green infrastructure forms part of a countywide biodiversity network of wildlife corridors.
- 9.7 High quality existing habitats present locally also contribute towards Cornwall's Nature Recovery Network. NP policies (notably NE 2 4, and CF2) seek to ensure the integrity and connectivity of the Network is maintained, and where possible enhanced. It is considered that providing protection to all green infrastructure assets, designated or not, will support the *"entire system as a functioning network"*.
- 9.8 Requirements through Policy NE2 therefore include ensuring that proposals "do not compromise the integrity of the network of green infrastructure and its assets, by avoiding adverse impacts, or providing effective mitigation where impacts are unavoidable." Furthermore, a proposal must ensure it "contributes to the connectivity, maintenance and improvement of the Network."
- 9.9 There is also an embedded requirement through the NP policy framework for development to deliver biodiversity net-gain, with specific reference made to Cornwall Climate Emergency DPD, Cornwall's Environmental Growth Strategy, and the Mitigation Hierarchy. Policy NE3 notably seeks to ensure that *"conserving and enhancing biodiversity habitats and landscape features is at the forefront of any development proposals so that mitigation is sequentially the last option, with onsite retention and enhancement the priority."*
- 9.10 It is recognised that the 10% net biodiversity gain principle is now a mandatory requirement, originating from the Environment Act 2021⁵. It is therefore considered that there is the potential for Policy NE3 to exceed national requirement; for example if it were to support development where it delivered in excess of 10% net gain. This would have the potential to deliver positive effects on the baseline.
- 9.11 Irrespective of the recommendation above, it is considered that overall the Neighbourhood Plan appropriately considers the ecological sensitivities present, and through not allocating sites for development, avoids the potential for any significant effects on the baseline. The NP policy framework builds upon higher level planning policy to establish provisions which will support and enhance habitats, species, and ecological networks in and around the neighbourhood area. **Minor positive effects** are therefore anticipated.

⁵ Environment Act (2021) [online] available here

Community wellbeing (including transport)

- 9.12 As set out in Chapter 5 above, there is no outstanding housing requirement for St Stephen-in-Brannel Parish to meet during the Local Plan period (up to 2030). The strategy set out through the Neighbourhood Plan is therefore not to allocate specific sites for development, but instead to support the continuing level of new infill, some limited rounding-off in suitable locations, 'brownfield land' development, and affordable housing led 'exception' sites to come forward (see Policies H2 - H7). It is considered that this approach will support community objectives while responding positively to Cornwall's housing crisis (including associated with the provision of 'Securing Homes for All: A Plan to Respond to Cornwall's Housing Crisis' 2021).
- 9.13 Furthermore, Policy H2 affirms that proposals for development outside of the eight settlements within the Parish will be strictly controlled in accordance with local plan policy. Where development does come forward within specified boundaries, it will be required to (Policy H3) *"integrate well whilst avoiding aggravating existing problems with parking and circulation."*
- 9.14 Policies H4 8 include criteria for local housing initiatives that help address affordable housing needs, as well as specialist groups. The parish notably has an ageing population, with policy requirements tailored to meet these needs, supporting sustainable and inclusive communities.
- 9.15 Policy CF1 identifies several assets which are especially important to the parish's communities, including schools, shops, community clubs, places of worship, and public houses. The policy confirms that well-designed proposals which diversify and improve the parish's range of services and local community facilities will be supported, where Cornwall Local Plan policy requirements are also adhered to. It is considered that this will both support existing communities and meet future needs; particularly in those villages that are very small scale and lack facilities. Likewise, key areas of Local Green Space, recreation spaces, sports pitches, and facilities for young people will be protected from loss through the provisions of policies CF2 CF4. Policy CF5 assures that developer contributions will be sought to ensure that the necessary services and facilities takes place alongside any future development. Provision will be *"consistent with the requirements of Policy 28 of the Cornwall Local Plan and effectively addresses local requirements"*.
- 9.16 Improved accessibility is further supported through policies RT1 5. Policy RT1 seeks to ensure that the current range of transport links for the parish are maintained or improved; particularly to the south, on the A3058 linking the towns of Newquay and St Austell. Additionally, the policy seeks to ensure that any further development does not exacerbate existing traffic/transport difficulties in the wider parish in terms of congestion and safety. Development will therefore only be supported where it *"is located and designed to promote active travel and access to public transport and improve air quality".*
- 9.17 Policy RT1 also requires new development to deliver a Transport Assessment or Travel Plan, and be designed with a 'speed reducing layout', considering the detailed 'transport hierarchy' (when >4 dwellings). This will positively contribute to the principle of safety in design, and contribute towards residents' overall satisfaction with the neighbourhood area as a place to live. Positive effects in this respect are also anticipated through the NP's design focused policies.

Policy D1 notably acknowledges that new development will be supported where it *"incorporates design features that enhance prevention of crime, anti-social behaviour and disorder and provide a secure environment by application of 'Secure by Design' standards."*

- 9.18 The St Stephen-in-Brannel Design Guide provides further, detailed guidance for development in the neighbourhood area. It is intended to sit alongside the Cornwall Design Guide 2021, and provide a finer grain of guidance in terms of the particular character or design opportunities in the Parish.
- 9.19 Modal shift is a key objective for the Neighbourhood Plan, and while it is the role of the County Council to manage improvements to the bus and rail services, Policy RT3 nonetheless sets out support for improvements to the parish's sustainable transport offer. Support for a shift away from private vehicle reliance is further seen through Policy RT4, which seeks to encourage the enhancement of digital communication links, reducing the need to travel and increasing levels of home working.
- 9.20 The parish's Public Rights of Way (PRoW) network can also be utilised to support modal shift, encouraging active travel uptake. Policy RT5 notably seeks to ensure access to PRoW, cycleways, footpaths and bridleways is maintained and enhanced where possible; supporting connectivity between villages. Specifically, there is a requirement to *"maximise opportunities for safe walking and cycling to services and facilities."* This is likely to be particularly important for those working from home; reflecting the increased value placed on access to nature, and physical activity.
- 9.21 As car use is currently high, (reflecting the rural nature of the area) a lack of car parking is also a perceived problem in many parts of the parish. Any new development therefore must (Policy RT1) *"incorporate sufficient car parking to realistically meet demand [including residents, visitors, delivery and work vans]"*. Further detailed guidance in this respect is provided through the St Stephen-in-Brannel Design Guide.
- 9.22 In terms of the economic vitality of the neighbourhood area, policies BE1 BE5 perform positively in terms of safeguarding and enhancing local businesses, employment development, and working from home opportunities. Policies BE1 BE3 support growth of local businesses, and the wider local economy; while Policies BE4 and BE5 support the growth of tourism and diversification of agriculture; capitalising upon local opportunities for sustainable economic growth.
- 9.23 Finally it is noted that measures proposed through the NP seek to help tackle the climate crisis; including setting out support for green tourism, access to nature, modal shift, and air quality improvements. The NP identifies these as 'cross-cutting issues', where proposed policy provisions will support sustainable growth of the parish, and positively affect community wellbeing.
- 9.24 Taking the above into consideration, **significant positive effects** are predicted against this SEA theme overall.

10. Conclusions and recommendations

Conclusions

- 10.1 The assessment has concluded that the NP is likely to lead to significant positive effects in relation to the Community and Wellbeing (including Transport) SEA theme. This reflects the focus of the NP on safeguarding and enhancing community infrastructure, supporting sustainable growth and functionality of settlements within the parish. The NP facilities the delivery of housing which is appropriate in scale and location to compliment and support existing communities and meets local needs; and supports economic vitality by enhancing the prospects for employment locally.
- 10.2 Positive effects also include improved access to green space and active travel networks, supporting connectivity and engagement with nature. The NP also seeks to strengthen the broader sustainable transport links within the parish to reduce the impact of traffic on its communities.
- 10.3 Minor positive effects are concluded in relation to the Biodiversity SEA theme, linked to the identification and protection of a network of 'green infrastructure' within the parish. NP policy provisions seek to retain and extend habitats, support connectivity and nature recovery networks, and deliver net gain. This builds upon higher level policy including the Cornwall Design Guide, Cornwall Climate Emergency DPD, Cornwall's Environmental Growth Strategy, and Cornwall Biodiversity Action Plan; amongst others.

Recommendations

10.4 As discussed at length through the NP, the mandatory requirement to achieve a 10% net gain for biodiversity in planning permissions has been introduced through the Environment Act 2021. It is considered that there is the potential for NP Policy NE3 to seek to exceed national requirement; for example if it were to support development where it delivered in excess of 10% net gain. This would have the potential to deliver positive effects on the baseline.

Part 3: What are the next steps?

11.Next steps and monitoring

11.1 This part of the report explains the next steps that will be taken as part of planmaking and SEA.

Plan finalisation

- 11.2 This Environmental Report accompanies the St Stephen-in-Brannel Neighbourhood Plan for submission to the Local Planning Authority, Cornwall Council, for subsequent Independent Examination.
- 11.3 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.
- 11.4 If the Independent Examination is favourable, St Stephen-in-Brannel Neighbourhood Plan will 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 'made'. Once made, St Stephen-in-Brannel Neighbourhood Plan will become part of the Development Plan for St Stephen-in-Brannel Parish.

Monitoring

- 11.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.
- 11.6 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Cornwall Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the St Stephen-in-Brannel NP that would warrant more stringent monitoring over and above that already undertaken by Cornwall Council.

Appendix A Regulatory requirements

As discussed in Chapter 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. Table AA.1 overleaf links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table AA.2 explains this interpretation.

Table AA.1: Questions answered by this Environmental Report, in line with an interpretation of regulatory requirements

	Questions answered		As per regulations the Environmental Report must include
	What's the plan seeking to achieve?		 An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SEA scope?	What's the sustainability 'context'?	 Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
Introduction		What's the sustainability 'baseline'?	 Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	 Key environmental problems / issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment
Part 1	What has plan-making / SEA involved up to this point?		 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 assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SEA findings at this current stage?		 The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		A description of the monitoring measures envisaged

Table AA.2: Questions answered by this Environmental Report, in line with regulatory requirements

Schedule 2

The report must include...

 (a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;

(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan

(c) the environmental characteristics of areas likely to be significantly affected;

(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;

(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;

(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;

(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;

(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information

(i) a description of the measures envisaged concerning monitoring.

Interpretation of Schedule 2

The report must include...

An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - What's the plan seeking to achieve?
Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance The relevant environmental protection objectives, established at international or national level	i.e. answer - What's the 'context'?
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan' The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - What's the "baseline"?
Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - What are the key issues & objectives?
An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach) The likely significant effects associated with alternatives, including on issues such as and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are	i.e. answer - What has Plan- making / SA involved up to this point? [Part 1 of the Report]
The likely significant effects associated with the draft plan	
The measures envisaged to prevent, reduce and as fully as	i.e. answer - What are the assessment findings at this current stage?
 possible offset any significant adverse effects of implementing the draft plan 	[Part 2 of the Report]

Appendix B Scoping information

Introduction

This appendix presents additional information on the SEA scope, namely key issues under the two SEA framework headings. As set out in the Scoping Report, these key issues were identified following a review of the context and baseline.

Additionally, this appendix presents a summary of responses received as part of the scoping consultation.

Biodiversity

- Within the St. Stephen-in-Brannel neighbourhood area there is the St Austell Clay Pits Special Area of Conservation (SAC), located just north of Stepaside. It is designated for its health, scrub, maquis and garrigue, phygrana and 'other land' (which includes the built environment, industrial sites and waste sites).
- Also within the neighbourhood area are a number of Sites of Special Scientific Interest (SSSIs), including: Crowhill Valley (south of Trelion); South Terras Mine (in Trelion); Tregargus Quarries (east of Treneague); and St. Austell Clay Pits (north of Stepaside, in the same area as the St Austell Clay Pits SAC).
- There are a number of internationally and nationally designated sites within proximity to the St. Stephen-in-Brannel neighbourhood area, including: Breney Common and Goss and Tregoss Moors SAC (to the north); St. Mewan Beacon SSSI (to the east); Trevalour Downs SSSI (to the north, east of Whitemoor); and Mid Cornwall Moors SSSI (to the north, overlapping with the Breney Common and Goss and Tregoss Moors SAC). All these designations are within 1km of the neighbourhood area.
- Locally important sites within the St. Stephen-in-Brannel neighbourhood area include four county wildlife sites (Bodinnick Wood by Coombe; Harvose and Ventonwyn Wood to the south; Lanjeth Heath to the east; and Longstone Downs to the east of Goverseth); Cornish Hedges, and Biodiversity Action Plan (BAP) priority habitats – purple moor grass and rush pasture, lowland heathland, ancient woodland, deciduous woodland and traditional orchard.

Community wellbeing (including transport)

- The St. Stephen-in-Brannel neighbourhood area has a variety of services and facilities that support community vitality and the quality of life of residents, with the availability of community assets essential for continued growth. It is recognised that residents travel out of the neighbourhood area or use the internet to access a wider range of goods, like bigger food shops, clothes and white goods.
- There are four unofficial local green spaces in the neighbourhood area; the St. Stephen-in-Brannel Neighbourhood Plan seeks to designate these sites. This will allow for the protection and enhancement of the green infrastructure network and provide space for recreation and community interaction.

- As the requirements of the working population continue to change, particularly in response to the COVID-19 pandemic, there is likely to be a requirement for adaptable dwellings which can accommodate more flexible working practices.
- Whilst the St. Stephen-in-Brannel is not allocating sites for housing development, the residents do understand the need for future housing and have therefore prepared a Housing Evidence Report (2022) which identifies a development capacity figure for the plan period. Additionally, stipulations have been made for housing mix, tenure, first homes and park homes so that future development is as complimentary of the area and the needs of the community as possible.
- The road network within the neighbourhood area is a mix of A roads, B roads and local roads. The A390 runs outside of the neighbourhood area to the south, and the A30 runs outside of the neighbourhood area to the north – both of these roads allow for vehicular access to wider variety of destinations. Traffic sensitivity is centred around the more built up areas within the St. Stephen-in-Brannel neighbourhood area.
- Whilst there are no rail stations within the neighbourhood area (the nearest being in St. Austell and Truro), most of the villages within St. Stephen-in-Brannel have access to the bus network which provides for work and school journeys and some late night services .
- The recovery from the COVID-19 pandemic has the potential to change travel patterns in the short, medium and (potentially) longer term. New development proposals should seek to connect and where possible extend Public Rights of Way networks to maximise opportunities for active travel.

Consultee	Consultation response summary	AECOM response
Environment Agency	No response received.	N/A
Historic England	We note that the draft Plan is not seeking to make specific site allocations for development. Therefore, we concur with your judgement to 'scope-out' the Historic Environment theme from the SEA study.	Comments noted.
	We have no further comments to make at this time.	
Natural England	Natural England generally agrees with the scope and level of detail to be included in the Environmental Report, and has the following comments to make:	Comments noted.
	Baseline information	SEA objective updated.
	Natural England notes that a Habitats Regulations Assessment screening report was prepared for the St Stephen-in-Brannel Neighbourhood Plan, which concluded that an Appropriate Assessment was required.	Reference will be made through the SEA to the
	The Strategic Environmental Assessment should be informed by and reflect the findings of the Appropriate Assessment.	European Sites Mitigation Strategy SPD where relevant.
	Fal and Helford SAC	
	Part of the plan area is within the Zone of Influence (ZoI) for the Fal and Helford SAC, within which impacts of residential and tourist development on the SAC would arise in the absence of appropriate mitigation.	
	Cornwall Council have adopted a European Sites Mitigation Strategy SPD whereby impacts can be avoided and mitigated through financial contributions. This is in order to avoid significant effects of recreational impacts on the Designated Sites from new housing/tourist developments within the ZoI. Reference of this should be made in the SEA and it will also obviously impact the HRA Appropriate Assessment.	
	Cornwall Council's adopted European Sites Mitigation SPD should be present in the Policy Context Review.	
	Biodiversity – SEA Objectives:	
	It seems that the first bullet point in point 3.3 is confused by referencing both minimising impacts and biodiversity net gains. It implies that biodiversity (and geodiversity) net gains are optional/possible. We advise that the wording in the first bullet point be amended from 'and provide net gains where possible' to 'following the mitigation hierarchy'. Point 4, which references biodiversity net gains, should be moved to follow this, to become bullet point 2.	

