



**National
Trust**

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Your Ref:

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Cornwall Council
Pydar House
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Dear Chris Daly and Mark Ball

**PA/17/01864/Pre-application Community Engagement (PACE)
Pendower Beach House Hotel, Veryan, Cornwall**

In response to the Pre-Application Community Engagement exercise the National Trust as a key local stakeholder wishes to set out comments in writing, which are for the Council to note, but also to be forwarded to the developers/applicant at the community forum.

The Trust owns a large stretch of the coast east and west of Pendower Beach Hotel, and the South West Coast Path runs adjacent to the site and along the vehicular access road. The two principal issues of concern to the Trust are the impact on the unspoilt character and appearance of the Heritage Coast in the AONB and the impacts in relation to coastal change.

The Trust notes the advice of Cornwall Council in their letter dated 22 December 2017, and it shares the broad thrust of the concerns expressed in relation to the quantum of development proposed on this site, which the Council considers to be 'major' in the context of paragraph 116 of the NPPF, and specifically the concern over the "urbanising effect" that the development would have on the character of this sensitive site in the Heritage Coast. However, the Council has underplayed a significant issue in that whilst it identifies "flood risk" as a "key constraint", it fails to adequately flag the issue of *coastal change* as a key constraint.

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The developer accepts that the site has a “significant ongoing risk from erosion” (identified as a key point in the Site Analysis document); and it acknowledges that “the primary access road to the site is severely threatened by coastal erosion”.

National Planning Policy on climate change and coastal change, not specifically referred to by the Council in their advice, requires; “Local planning authorities to reduce risk from coastal change by avoiding inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and:

- be clear as to what development will be appropriate in such areas and in what circumstances
- make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas”

(NPPF; paragraph 106)

Whilst the Council has failed to take strategic responsibility for the designation of Coastal Change Management Areas (CCMA), there is absolutely no question in this case that the site falls within an area likely to be affected by physical changes to the coast and the developer openly acknowledges this. It is therefore incumbent upon the Council, taking into account the likely lifespan of the vehicular access road, and having regard to the Shoreline Management Plan in line with Cornwall Local Plan Policy 26, to proactively establish what development will be appropriate and in what circumstances. National [Planning Practice Guidance](#) indicates that; “Permanent new residential development will not be appropriate within a coastal change management area.” (Paragraph: 073 Reference ID: 7-073-20140306).

The Cornwall and Isles of Scilly [Shoreline-Management-Plan-2](#) Mid-term Review (Sept 2016) confirmed that there would be no change to the policy of “realignment” (managing coastal processes to realign the ‘natural’ coastline configuration) at Pendower and Carne Beaches, and the current SMP2 policy for this “active section of coastline” makes clear in its policy for “no active intervention” at “Pendower west” that there are “no aspects of this location which are likely to economically justify a large scale technical solution to prevention of erosion.” Whilst this might not preclude local works to defend the access road, this would only be if they did not impact on local beach processes (SMP2 2011, chapter 4 PDZ4). National policy also requires an assessment of what the impact on coastal change would be from any form of development that is deemed “appropriate” by the Local Planning Authority (NPPF; para 107).

The Trust is concerned that the Council in its email to the developer of 5 January 2018 appears to be encouraging a level of development that might justify, and “provide a cross subsidy to”, coastal defence works without considering the policy context in terms of both national planning policy on coastal change and Cornwall Local Plan Policy 26.

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The developer has identified a *new* vehicular access in the Site Analysis Document, with a “potential crossing” of the stream further inland, but this is located over National Trust land, and is not something that has been discussed with the National Trust.

It is clear that coastal change, and access to the site, is a major constraint to development. This needs to be resolved at the outset with the Council establishing what development may be appropriate and in what circumstances, *before* consideration to the principles of development and its merits.

Yours sincerely

Michael Calder MRTPI
Planning Adviser

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