

# Introduction

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## CEG OF THE 1383 DAYS

1383 days since the Secretary of State decided to turn down a planning application for a new sea wall on the beaches of Carlyon Bay and the official closing date for comments about a new planning application for the same site.

1383 days for the applicant – once called Ampersand and now re-badged as CEG – to hire every expert they can find to attempt to make their case for yet another attempt to deposit a substantial amount of concrete on these once popular beaches.

1383 days for CEG to prepare over two and a half kilos of documentation, mount an expensive PR campaign to achieve their commercial ends and to reveal more plans for a town of 511 apartments, retail and leisure buildings.

1383 days for all of this.

And the balance in this democracy of ours?

21 days from the plans being made available for public perusal to the day when Cornwall Council first said that public comments should be presented. To make matters worse, the Council website couldn't cope with the volume of material deposited by CEG and failed for most of those important 21 days to get any material on their planning website for the public to get some chance to digest this monstrous plan.

1383 plays 21. An even playing field in some minds.

In those 1383 days some very pretty documents were produced, some very fine words were written. Some of those words appear again and again. We are for instance told that this *'world class, year round...development...will be transformational.'* We see in just one table that the effects from the scheme will be *'Neutral/negligible'* a phrase used 11 times in the one table (Planning Summary p5 section 2.10). But according to the developer things are much better than even that! In that same table the word *'beneficial'* is used also on 11 occasions. In one specific example from this now infamous table the effect of traffic on local roads after completion is described by one of those instances of the use of the words *'neutral/negligible'*. Yet elsewhere one can discover that neutral/negligible adds up to an increase in traffic on one section of road as a huge 44%.

Cheap points, some might say. But they are valid and we have attempted to read and analyse as much of the submitted documentation as possible in the limited time we have. This is why we beg you to read as much as you can of the CarlyonBayWatch papers attached as you can manage.

We would point out that our long-held belief is that there should be re-building on the old brownfield, the site of the old Coliseum building and its ancillary structures. These, however, were only on part of one of the three beaches. This plan, which we believe runs counter to current policies, would cover far more land than that. We believe this huge plan must be rejected. We hope our papers will help the reader to come to that conclusion.

Within our submission we draw attention – among other things - to the following:

- The validity or otherwise of the extant planning permission.
- The contravention of Local and National Planning Policy.
- Traffic Impacts
- Flood Risk and threat to Public Safety.
- Climate Change and sea level rise.
- Implications to costs for the local ratepayer.
- The frailty of the Socio-Economic benefits
- Public Opinion.
- Inherent stability issues with the site.
- Public access and its potential restriction.
- A total loss of what was once viewed as a Public Amenity

We would also suggest that – since this developer is offering within a draft Section 106 Agreement a £5,000,000 conditional grant to the Council for off-site affordable housing - the Council becomes, *de facto*, an interested party.

The Council has already declared publicly, when publishing the registration of this application in the Cornish Guardian 16th. March 2011, an unusual 'rider', stated as follows: "***This application does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated***".

The approval of this 'hybrid' application, in which a detailed sea-defence wall is to be constructed without anything but outline parameters as to what is to be built behind it, would be tantamount to the approval of a "pig in a poke". Because of the 'outline' nature of what is to be built, almost the entire

developer's supporting submission where it relates to the outline can be nothing more than speculation.

Notwithstanding any claim (which we firmly reject) on a 'fall-back' position due to the existence of an 'extant planning', this application must be viewed as a completely new planning application. We submit in the following submission that the 'extant planning' and its associated claim of 'fall-back' are now completely non-existent and therefore do not merit a 'material consideration'.

Assuming a reliance on the existence of the extant permission we submit that 21 years have passed since that permission and the world has moved on. Our knowledge in relation to climate change and its associated sea level rise has rendered the idea of building on a beach, at sea level, backed by a sheer cliff, as no longer being a sustainable option.

This application does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated so this application should be refused.

However, should the Planning Authority be minded to approve this application then we consider it vital that the matter be given the fullest possible examination in a Public Inquiry.

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