

PROTECTING THE COASTAL ZONE

An examination of conflicts between Planning Applications for development on the beaches of Carlyon Bay and current Planning Policy guidelines at Local, National and International levels.

- 1.1. *"It is acknowledged that the permitted leisure scheme is in substantial conflict with current planning policy and would not get permission if sought today."*

(Cornwall County Council's view stated at the 2006 Public Inquiry. Inspector's report 7.149)

- 1.2. *"Restormel is particularly valued for its countryside, especially the coastline. A key aspect of the vision for Restormel is to ensure that future generations can benefit from this heritage, as we ourselves have done".*

(Restormel Borough Council's still current Local Development Framework Core Strategy under the heading 'Vision' (2.10 on page 8)

- 1.3. Whilst those were the views of the County Council in 2006 and of the now abolished Restormel Borough Council - and while some of the Planning Guidelines have changed - we can see no reason why those robust views should not be shared by the Unitary Authority of 2011.

- 1.4. In fact Cornwall Council admits: *"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"*. (Cornwall Council footnote to the application published in the Cornish Guardian 16th March 2011)

- 1.5. This application conflicts with local, national and international policies on building in areas at risk of flooding and with development in a coastal zone.
- 1.6. The developer argues in its application that where there is conflict with policy it is outweighed by the benefits which the development will bring to St Austell and in any case this scheme is much to be preferred to the extant permission because the permitted scheme is even more in conflict with national policies. The importance of the Extant consent to the developer is dealt with elsewhere in this submission. (CBW The Extant – an Empty Threat pp 5-18)
- 1.7. Here we examine some of the most relevant sections from current government policy papers and other published material specifically relevant to this proposed development.

Previously developed land

- 2.1. PPS3 sets out the government's policy on housing. As the developer points out, it emphasises that housing should be developed in "*...suitable locations, which offer a good range of community facilities with good access to jobs, key services and infrastructure*" (PPS 3 para. 36).
- 2.2. We submit that housing at sea level, with cliffs to the rear and only one route in and out scarcely adds up to a "*suitable location*". We also submit elsewhere that St Austell's services and infrastructure will be put under severe pressure by this development without the claimed benefits to the economy. (CBW Socio-Economic and Transport pp 76-82)

2.3. PPS3 suggests that: *"The priority for development should be previously developed land, in particular vacant and derelict sites and buildings."* (para 36).

2.4. We submit the only previously developed land at Carlyon Bay is restricted to Crinnis and the site of the Cornwall Coliseum complex. This picture shows how it was used in the 1980s.



2.5. The developer's own consultants in their Flood Risk Assessment describe the site as partially developed. *"Approximately 17 % of the site is currently covered with buildings and parking areas. ... Shorthorn is undeveloped, comprising the Sandy River Channel, sandy material, trees and areas of shrubs ..."* (Appendix D1 FRA para 2.2)

- 2.6. This photograph shows the mosaic of trees and shrubs and grassy footpaths on Shorthorn before it was bulldozed by the developer in 2004 – hardly a brownfield site.



- 2.7. In their Planning Statement, CEG claims that the whole of Carlyon Bay can be defined as a brownfield site because it falls within "*the curtilage*" of the Coliseum complex. They then declare it "*an academic discussion*" because the existence of the extant consent "*accepts the principle and suitability of the site for the development*". (CEG Planning Statement 8.18)
- 2.8. Apart from once again highlighting the importance they attach to the discredited extant consent (CBW The Extant - an Empty Threat) they conveniently do not explain how they conclude that Shorthorn and Polgaver beaches come within the curtilage of the Coliseum complex. What is or is not the curtilage seems to have been a matter of dispute in various planning cases which have come before the courts.

- 2.9. According to a government Planning Inspector in a judgement in January 2011: *"Planning law does not define the word 'curtilage'. The Oxford English Dictionary defines 'curtilage' as a small court, yard, garth, or piece of ground attached to a dwellinghouse, and forming one enclosure with it and the area attached to and containing a dwellinghouse and its outbuildings."* (Appeal decision Appeal Ref: APP/U5930/X/10/2132832 14 Lemna Road, London E11 1HX Appendix AP 17)
- 2.10. In introducing this term to the Carlyon Bay site CEG must be hoping to prevent discussion of the fact that Shorthorn and Polgaver are not previously developed "brownfield" sites.
- 2.11. In any case PPS3 also says: *"There is no presumption that land that is previously-developed is necessarily suitable for housing development nor that the whole of the curtilage should be developed."* (PPS3 para 41 Effective Use of Land)
- 2.12. Following the Public Inquiry into a new sea wall held in November/December 2006, the Secretary of State agreed with the Inspector that:
- "The application is clearly in the coastal zone and part of the generally undeveloped coastline of Cornwall. In general the Development Plan policies seek to protect such areas from built development."* (para 12.10)
- 2.13. *"Although these policies aim to direct development away from such locations, they also acknowledge the prospect of putting previously developed land to good use....the proposed development would extend over all three beaches, whereas the former Coliseum Building and its associated development are very much restricted to Crinnis Beach. Even though more or less on the line of the proposed wall (that being considered in the 2006 Inquiry) I do not consider the installation of the temporary steel sheet piled wall across Crinnis and Shorthorn Beaches represents a previous development of the land."* (para 12.11)
- 2.14. Cornwall County Council turned down a previous application for holiday villas in 1973 on the grounds that villas *"to the west of the existing complex would result*

in unduly prominent development both in the landscape and seascape and, if permitted, would be detrimental to the amenities and environment of the area.” (Cornwall County Council letter ref ER/49243 - can be seen in Appendix AP 105)

- 2.15. It seems, therefore, that both the Inspector and Cornwall County Council did not consider the area beyond the Coliseum complex to be previously developed land.
- 2.16. *“Away from the immediate area of Carlyon Bay there is a perception that this scheme is just ‘redeveloping brown field (Old Coliseum) land, but that is less than one-third of the project - the rest is ravaging a naturally beautiful beach in a unique setting.’* (The Ramblers’ Association in a letter to the Secretary of State 5th August 2003 – full letter can be seen in the Appendix AP 18.)
- 2.17. Although this brand new planning application is substantially different in some areas from earlier ones, it is clear that development is still planned on far more than the original brownfield site.

Flood risk

- 2.1. The general aim of PPS25 is to direct development away from areas where people and property would be at risk of flooding.
- 2.2. In its Annex D Tables D.1 to D.3 it defines various zones at risk of flooding and the degree of vulnerability of different types of development. For instance, residential dwellings are put in the 'more vulnerable' group and shops are in the 'less vulnerable' group. (PPS25 Annex D p22)
- 2.3. In its Planning Statement the developer claims parts of the site at Carlyon Bay are in Flood Zone 3a (a High Probability Flood Zone carrying a 1:200 or greater coastal flood risk in any year), *“much of the rest”* is in Zone 2 (Medium Probability

with between 1:200 and 1:1000 annual probability of flooding) and a "small part" lies in Zone 1 (Low Probability). (Planning Statement 8.13)

- 2.4. Although, as the Cornwall Strategic Flood Risk Assessment (SFRA) points out, such estimates are "*based on statistical analysis and the flood event could in reality occur much sooner.*" (Cornwall SFRA November 2009 p 75 Appendix H Return Period).
- 2.5. The SFRA also points out that "*Climate change is also expected to induce larger and more frequent storm surges and increased wave heights and wind speeds, potentially increasing coastal flood risk. ... The science of global warming, induced climate change and sea level rise is an evolving discipline and predictions of the likely impacts are liable to change as it becomes better understood.*" (Appendix A p 47 Cornwall SFRA)
- 2.6. PPPS25 aims to steer new development to areas at low risk of flooding (Zone 1) and to avoid those at higher risk (Zones 2 and 3a). Although it allows development on the higher risk areas if there are no available sites in the low risk zone (the Sequential Test) and if the development then passes the Exception Test.
- 2.7. CEG claims it passes these tests because the "*site has been developed for many years and there is an extant consent for development of 511 units and leisure/commercial use across Crinnis and Shorthorn. Therefore, this development should be used as a baseline for comparison in the Sequential (and Exception) test.*" (Planning Statement 8.11)
- 2.8. As we argue above, the statement that the "*site has been developed for many years*" should only apply to the Coliseum site on Crinnis (17% of the whole) coupled with the fact that the Extant Consent is discredited (examined in CBW's submission on the Extant Consent), means that this development should not be used as a "*baseline for comparison*".

- 2.9. The Planning Statement says the application passes the Sequential Test because there are no suitable sites in a low flood risk zone that are: *"Cornish brownfield sites, in a beach location, that are reasonably available (with a comparable planning history)"* or preferable to Carlyon Bay given that any beach is *"likely to have the same vulnerability to flooding)"*. (Planning Statement 8.11)
- 2.10. That statement can be applied to the previously developed area on Crinnis but should not be applied to Shorthorn and Polgaver which, as shown above, are not brownfield sites. Also beaches are indeed likely to be vulnerable to flooding but do not generally have hundreds of dwellings on them with cliffs to the rear and only one access road.
- 2.11. This latter point is brought into sharp focus when reading what the SFRA has to say about access routes.
- "Access/egress routes should aim to remain flood free during a 1 in 100 year fluvial and 1 in 200 year tidal flood. Where this cannot be achieved Cornwall Council will need to be satisfied that there is a satisfactory plan for evacuation, based, where necessary, on consultation with the emergency planners and services. This is not a matter of the Environment Agency formally approving plans. Cornwall Council will need to be satisfied that people (including those with restricted mobility), will be able to reach places of safety (either safe refuges within buildings or safe access) and that emergency services can access buildings to rescue and evacuate people."* (SFRA Appendix E p64 "What is Safe Guidance")
- 2.12. The Planning Statement then claims it applied the Sequential Test by moving *"some of the development and sea defences back compared to both the extant and the 2006 configuration"* (Planning Statement 8.12).
- 2.13. This statement only has validity if the presence of an Extant Consent as a fall-back is accepted. We submit (CBW The Extant – an Empty Threat) the Extant Consent is dead and buried and cannot be used as a point of comparison.

- 2.14. Turning to the Exception Test: This allows development on areas at risk of flooding if a) the wider sustainability benefits to the community outweigh the risks; b) if it is on previously-developed land or if not on previously developed land there are no alternative sites; c) it is safe and, where possible, will reduce flood risk overall. (PPS25 Annex D para D.9)
- 2.15. CEG claims its application passes the first requirement (a) because it sets out measures in its Sustainability Statement to ensure sustainability and to promote sustainable lifestyles. This point is highly debatable.
- 2.16. CEG once again compares this scheme to the Extant Consent by claiming the sea defences are better and more sustainable by setting them further landward as there is no need for beach recharge. Beach recharge was not part of the Extant Consent but was proposed in the 2005 Revised Sea Wall Application ruled out as “unsustainable” by the decision of the Secretary of State after the 2006 Public Inquiry. Beach recharge was recommended by the consultants because without it there would be no beach in front of the sea wall – moving the wall carries no guarantee that the beach may not be eroded in front of it.
- 2.17. In any case, as we argue elsewhere (CBW Sustainability page 118-138), maintaining sea defences is costly and no longer considered necessarily to be sustainable, especially when there is no need for it unless there is something to defend.
- 2.18. This is borne out by the draft Shoreline Management Plan (SMP):
- “Temporary defence (steel piles and rock armour) of the development site has been constructed along some 600m of Crinnis Beach. A suitable position for any permanent defensive line (which would need to be established to protect any development) would be critical to the long term overall sustainability of the foreshore. Ensuring that any structures are set far enough back from the predicted mean high water position in 2105 would be critical.”* (SMP Chapter 4 MA7 Par Docks to Black Head)

2.19. But who can predict with accuracy the high water position 100 years in the future? The SMP is being drawn up to plan for rising sea levels and coastal change. In some areas it is recommending maintaining sea defences and in others to draw back and in others to advance sea defences. The SMP at Carlyon Bay, as the Secretary of State pointed out in her decision: *"is not particularly supportive of the proposals because its primary conclusion is to do nothing"*. (Decision by Secretary of State for Communities and Local Government 18 June 2007). This is a key point – at the moment there is nothing to defend. This proposal seeks to put vulnerable structures in a flood risk zone which will then need defending. This is not an example of sustainable development.

2.20. As to the wider social and economic benefits claimed by the scheme such as new jobs, spending in the local economy and sustainable transport, these are questioned elsewhere. (CBW Socio-Economic and Transport).

2.21. Exception Test (b) on previously developed land: This again is addressed above but the Planning Statement goes on to argue that it does not matter whether the site is brownfield or not because the Extant Consent *"...accepts the principle and suitability of the site for the development ..."* (Planning Statement 8.18). As we argue that the Extant is discredited and that only 17% of the site is previously developed, the point is obvious.

2.22. Exception Test (c) – the development must be safe and where possible reduce flood risk:

The Planning Statement says that model testing of the sea defences demonstrates they will be safe and meet a *"higher standard of flood defence than the extant scheme"*. (Planning Statement 8.20)

2.23. Once again the discredited Extant Consent is used to justify the claimed benefits of this new scheme. Whilst we do not doubt the expertise of the consultants who carried out the Flood Risk Assessment and say the development will be safe, the

Cornwall SFRA in its "What is Safe?" guidance points out "*...the uncertainty of modelling*" (Cornwall SFRA p 64). Such uncertainties should not be ignored when consideration is being given to putting hundreds of dwellings in a flood risk area where no dwellings and therefore no comparable risk existed before.

- 2.24. The uncertainties involved in the area of development in high risk coastal zones has also caused concern to the Parliamentary Office of Science and Technology. In their Postnote no 342, October 2009 they point out that "*seasonal average and extreme waves are expected to increase in the South West of England ...*" and emphasises "*the uncertainties in climate change impacts. While sea level rise will be a major problem for the English coastline, the rate and amount of change are less clear. The risk of more frequent and intense storms due to climate change is even more uncertain.* It also points out that "*risk can be reduced but not eliminated*".
- 2.25. "*Hard coastal defences increase risks to assets by interrupting natural coastal processes, adding to overall vulnerability and enabling development in high risk areas.*" (Postnote 342 Parliamentary Office of Science and Technology – full report in Appendix)
- 2.26. International policy now focuses on how to respond to the increased risk of flooding including that of flood by sea because of rising sea levels. The European Union Flood Risk Directive 2007/60/EU requires member states to identify areas "*where potential significant flood risk exists*".
- 2.27. In response to that directive, parts of Carlyon Bay have been identified as at "*high risk of flooding in a 1 in 200 year event*". The EU Directive wants governments to "*focus on prevention*" and "*... preventing damage caused by floods by avoiding construction of houses and industries in present and future flood-prone areas...*"- the point is obvious – it is not appropriate to build hundreds of residential homes in such an area.

2.28. And in one of the few remaining parts of PPG 20 which are still in force:

"Whilst realistic provision should be made in development plans for the foreseeable development needs of an area, the coast, particularly the undeveloped parts, will seldom be the most appropriate location." (PPG20, 2.10)

2.29. On January 20th 2005, coastal management expert Dr Bob Earll, condemned the Carlyon Bay beach development as an example of bad practice to a conference of over 300 professionals representing government departments, industry and local authorities and agencies such as English Nature and the Environment Agency.

2.30. *"Recent studies show that changing wave regimes in relation to climate change will mean that many Cornish beaches, upon which tourism in that region depends, are going to lose sand and become rocky platform. Building on a dynamic coastline such as that which exists in Cornwall is seriously problematic for all those concerned. Building there without knowing exactly how and by whom ongoing management is to be executed and funded is short-sighted in the extreme. There are many reasons why it is bad practice. With regard to the beaches at Carlyon Bay, there are so many parts of this project which are unacceptable that it is time to think again..... Developers who build near the coastline are creating a time bomb of potential costs and liabilities which residents and local authorities in those areas, who may have to pick up the bill, need to fully understand."*

Dr Bob Earll, of Coastal Management for Sustainability, to the conference Coastal Futures 2005, January 20th 2005 – see Appendix AP 106.

2.31. This last point is also addressed by the Environment Agency in its assessment of the likely effects of climate change at Carlyon Bay. The new Shoreline Management Plan (SMP), currently in draft form, estimates that:

"Landward movement of MHW (Mean High Water) by up to 10m is possible due to sea level rise ..." It goes on to explain that the *"proposed new development would have a significantly larger footprint than the existing development, particularly when considering development above the mean high water position at Shorthorn Beach."*

- 2.32. Not only does that statement reinforce the point that new plans will extend the development far beyond the original brownfield site, it also emphasises that it is critical that any structures are set far enough back from the predicted mean high water position in 2105 and concludes:

"The preferred plan and policy for Carlyon Bay is no active intervention Given that it is anticipated that a condition of the planning permission would be that the site owners and managers remain responsible for any defences for the life of the development, the no active intervention policy therefore also reflects the position of the coast protection and flood defence authorities, in that they would not become default maintainers of the defences at Crinnis Beach in the future."
(Shoreline Management Plan chapter 4 Par Docks to Black Head)

Economic Growth

- 3.1. PPS4 relates to non-residential development and in this case is relevant to the commercial/leisure uses proposed at Carlyon Bay which are classified as town centre uses.
- 3.2. The government's stated aims in PPS4 are to deliver more sustainable patterns of development, reduce the need to travel, especially by car, respond to climate change and to promote the vitality and viability of town and other centres as important places for communities. To do this, the Government wants: *"new economic growth and development of main town centre uses to be focused in existing centres"*. (PPS4)
- 3.3. The Carlyon Bay site is 4km outside the boundary of St Austell and therefore even further from St Austell town centre. The application is also not in accordance with a development plan which means it has to be assessed by "sequential and impact" tests under PPS4.
- 3.4. CEG claims the Sequential Approach is satisfied, because it can demonstrate the need for the development at the site (i.e. it serves its local residents and visitors), the scale is appropriate in relation to the wider development and there are no suitable sites in the central town area. (CEG Planning Statement 11.5 – 11.17)

- 3.5. Again, this part of the Planning Statement relies heavily on the discredited Extant Permission because the new application does not increase the scale of the commercial/leisure area. But if, as we submit, the Extant has no chance of being built, then the commercial units have no justification without the residential development as a whole.
- 3.6. As to the Impact assessment under PPS4, again the Planning Statement relies on the Extant permission establishing the principle of the scale and range of commercial/leisure space. It says the impact will be the same as the Extant and will have "*negligible*" effects on trading levels in St Austell Town Centre. (Planning Statement 11.29) The developers presume that the facilities will "*serve the day to day needs of those living, visiting and working on the site*" and if there was no retail floor space people "*would need to travel to the facilities within St Austell to access a reasonable range of shopping facilities*". (11.10)
- 3.7. But this would result in "*unsustainable transport choices*" (in conflict with PPG13. Transport issues are more widely addressed in CBW's Transport submission). So the logical conclusion seems to be that this development of 511 residential/and or holiday homes will have a negligible effect on St Austell Town Centre trading levels to comply with the requirements of PPS4, which does not want out-of-town shopping to draw trade from town centres. But at the same time this application will bring no benefit to St Austell's traders because no one will visit them, thereby conflicting with PPS4 which promotes the regeneration of town centres.

LOCAL PLANS

- 4.1. "*It is acknowledged that, in principle, this application does not meet the local plan policy. It is also acknowledged that the site is not allocated nor identified in a housing land supply assessment ...*" (Planning Statement 9.8).
- 4.2. This development, it is admitted by CEG, does not meet local plan policies. But as always they rely on the Extant to justify their application (9.9) and instead compare it unfavourably with the new application to persuade us of the scheme's benefits.

- 4.3. But if looked at with the assumption that the Extant will never be built then a different picture emerges.
- 4.4. The Development Plan in Cornwall comprises the 2001 Restormel Borough Council Local Plan (RLP), the 2004 Cornwall Structure Plan and the 2001 Regional Planning Guidance for the South West. Until a new Local Development Framework is produced, these are still the policies material to the determination of the application.
- 4.5. *"The environment of the South West is a key strength. The varied and dramatic landscape, the rich and diverse wildlife ... the overall sense of place and quality of life for which the region is renowned, are of immense value to the people who live in, work in and visit the area."* (RPG 10: The Natural and Built Environment 4.1)
- 4.6. The work on the unauthorised "temporary" sea wall (the metal shuttering and the tons of rock dumped on the beach) together with clearance work on the areas once covered by vegetation have already had a detrimental effect on the local ecology and environment. A varied coastal habitat has been lost and the dramatic landscape of cliffs and sea will be marred by this massive development.
- 4.7. CEG claims the development will provide opportunities to strengthen St Austell's economic base in accordance with the Cornwall Structure Plan Policy 20 including the regeneration of the town centre (summarised in the Planning Statement 7.5 – 7.6).
- 4.8. As submitted above, if people are not to be encouraged to shop in St Austell then it remains a mystery how that helps the town centre. (For the wider economic issues see the CBW Socio-Economic submission).

- 4.9. CEG claims the proposals will provide quality facilities and accommodation as identified in the former Restormel Borough Council's 2008 Strategic Investment Framework & Economic Strategy and the recent Tourism Issues Paper (Issue T2) prepared by Cornwall Council to inform the emerging Core Strategy. It says the proposals will complement the tourist facilities at Eden, Charlestown and Fowey. (Planning Statement 7.17)
- 4.10. You do not need homes on a beach to achieve this aim.
- 4.11. At 7.18 the Planning Statement describes the poor appearance of the buildings on Crinnis which *"detract from the visual appearance of the site and beaches. Other than the beaches and the sea, there are few facilities...which affects the amount of time that people dwell on the site"*.
- 4.12. But that "poor appearance" is the fault of the developer who removed the roof of the Coliseum and partially demolished other buildings on the site, before piling up rubble and erecting without permission a line of boulders and metal shuttering. The beaches and sea are enough to keep people on beaches all day elsewhere and good facilities can be provided without the need for 511 luxury apartments.
- 4.13. As the following pictures show, generations of people have used the Carlyon Bay beaches when the facilities provided were somewhere to eat, public conveniences, car parking and lots of space.



- 4.14. Another so-called "tourism benefit" is setting back the sea defences which increases the area of the beach without the need for beach recharge.
- 4.15. Again this is only compared with the extant – historically no beach recharge was needed.

- 4.16. *"The continuity of occupation will enhance the atmosphere and sense of place of this development, adding to the experience of visitors."* (7.26). This is pure assumption.
- 4.17. The developers claim additional benefits for visitors will arise because of *"enhanced recreational activities"* on Polgaver. (7.27) But a survey of local residents found that 80.8% wanted Polgaver left to nature. (Survey for John Oxenham, County Councillor, July 2010 – full survey in Appendix AP23)
- 4.18. The Good Practice Guide for Tourism and RPG10 Policy EC1 calls for careful management to maximise benefits of tourism.
- CEG's answer to this is *"The management of the scheme has to be worked up in detail but the elements that **may** maximise the impacts on the economy...* (Planning Statement 7.32. Note the use of the word "may".)
- 4.19. The elements mentioned *include "spending on suppliers who **may** be local"* (again the use of the word "may") and the provision of information in order that visitors know about local attractions (most B&Bs do this).
- 4.20. *"The presence of highly-skilled residents, some potentially with their own existing businesses, will support investment as well as help stimulate entrepreneurial activity. In particular, over time, some residents **may** choose to set-up or relocate businesses to the local area. In this respect the scheme and the units will be "transformational" in an area where economic regeneration is a key priority."* (Planning Statement 9.26 para 3)
- 4.21. The claims for economic regeneration and *"transformational"* development seem wholly founded on assumptions and wishful thinking. A large development which is contrary to local, national and international policies on building in a coastal zone is likely to be only of benefit to the developer and shareholders and not to the people of Cornwall.

CONCLUSIONS

- 5.1. There are substantial areas of conflict between this Planning Application and current Planning Policy guidelines at international, national and local levels.
- 5.2. Even the developers state in the application that there is conflict with policy although – of course – they claim that is outweighed by the benefits which the development will bring to St Austell and in any case they argue that the application relies on the existence of the 1990 extant consent, which we submit is now discredited.
- 5.3. 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. That is a fact published by Cornwall Council.
- 5.4. In the developers' own Planning Statement they acknowledge that, in principle, this application does not meet the local plan policy. It is also acknowledged that the site is not allocated nor identified in a housing land supply assessment .
- 5.5. One national planning policy says that the priority for development should be previously developed land. Yet the only previously developed land at Carlyon Bay is restricted to Crinnis and the site of the Cornwall Coliseum complex and policy says not all previously developed land is suitable for housing. The developers also claim the other two beaches are part of the "curtilage" of this complex, but "curtilage" is not defined in planning law and in any case there is no presumption it should be developed.
- 5.6. One National Planning Policy Guideline (PPG20) states quite clearly that "*Whilst realistic provision should be made in development plans for the foreseeable development needs of an area, the coast, particularly the undeveloped parts, will seldom be the most appropriate location.*"

- 5.7. The developers say their plans will have negligible effects on trading levels in St Austell Town Centre. Yet in the same submission they claim the development will provide opportunities to strengthen St Austell's economic base in accordance with the Cornwall Structure Plan Policy 20 including the regeneration of the town centre. So there is conflict within the submission itself. If people are not to be encouraged to shop in St Austell then it remains a mystery how that helps the town centre.
- 5.8. It seems self-evident that any attempt to avoid flood risk cannot mean putting well over a thousand people and more than 500 residential dwellings on a site which is defined as being in an area at risk of flooding from the sea and with the prospect of climate change raising sea levels substantially.
- 5.9. Proponents of the scheme indeed argue that the benefits do outweigh the risks but we submit that these perceived benefits are uncertain, short-term ones while the risks – increasing risks - are for ever.
- 5.10. We can only repeat: This proposed massive development conflicts with local, national and international policies. It should be rejected.