

Your Ref: email dated 26.05.21
Our Ref: L/Pent3/FRA.doc/21

Mr. and Mrs. M Heaslip,
The Meadows Caravan and Camping Site,
Pentewan Road
Nansladron,
St. Austell
Cornwall
PL26 6DL

15th June 2021



Technology Centre
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Wolverhampton, WV10 9RU

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Dear Mr. and Mrs. Heaslip,

**Addendum to Flood Risk Assessment in support of PA21/04578:
The Meadows, Pentewan, St Austell**

1. Introduction

You are seeking full planning permission for the use of your land for camping, caravanning and caravan storage in a more flexible way than that which is prescribed in the certificate of lawfulness granted in 1999 (ref. 98/01452).

You have two main objectives: the first is the ability to run the tourism business 12 months of the year; the other is to increase the total number of pitches from 40 to 50 and for there to be a less rigid and prescriptive split between caravans and tents (currently the maximum numbers are 20 caravans and 20 tents).

Cornwall Council has asked for an addendum to the previous FRA in order to specifically address the issues of increasing the length of the season and increasing the number of pitches. The development proposal does not involve any building works *i.e.* no physical development.

2. Sequential Test

Please see Table 2 of “Planning Practice Guidance for Flood Risk and Coastal Change”, DCLG, updated 6th March 2014 (referred to herein as PPG).

The Flood Risk Vulnerability Classification for the existing land use (holiday or short-let caravans & camping, subject to a specific warning & evacuation plan) is defined as “More Vulnerable”.

The majority of the caravan and camping site lies within Flood Risk Zone 3 (FRZ3), which is the highest risk setting (except for the functional floodplain).

A change of use to a “more vulnerable” development would not be acceptable in the FRZ3 setting (Table 3 of PPG). However, the caravan and camping site is already permitted under the certificate of lawfulness granted in 1999 (ref. 98/01452).

Therefore, in applying the Sequential Test, a pragmatic approach on the availability of alternatives should be taken.

As per current guidance, when considering planning applications at existing business premises, it would generally be impractical to suggest that there are more suitable alternative locations for that development elsewhere.

For this reason, it is considered that the development proposal cannot be steered into a lower risk setting (FRZ1 or FRZ2).

The only part of the landholding that lies outside FRZ3 is at the northern end, which is already occupied by the campsite reception and owner's bungalow.

3. Exception Test

This asks for demonstration that (i) the development will provide wider sustainability benefits to the community that outweigh flood risk, and that (ii) it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reducing flood risk overall.

(i) Sustainability

As stated in previous advice (PA17/03005/PREAPP, dated 24th November 2017):

- This proposal is at an established tourism site; the principle of such proposals, which allow existing rural businesses to develop and expand, is supported by both national and local planning policy.
- The Cornwall Local Plan (CLP) sets out that the vision for Cornwall's future is to "achieve a leading position in sustainable living". "One of the objectives identified in relation to supporting the economy is that of enhancing "the cultural and tourist offer in Cornwall and to continue to promote Cornwall as a year round destination for tourism and recreation".

(ii) Safety in event of flooding

The flood resilience of the accommodation pods was addressed under previous planning *e.g.* by ensuring that Finished Floor Level (FFL) in the accommodation pods is 300 mm above the estimated flood level. The development proposal (as covered by the current planning application) does not involve any building works *i.e.* no physical development; therefore, there is no requirement to specify FFL.

Given that there will be no building works (*i.e.* no introduction of new hardstanding), it follows that there is no increase in flood risk at downstream receptors.

4. Hydrological Setting

The Environment Agency (EA) has provided an up-to-date version of the Detailed FRA/FCA Mapping (Product 4) for the landholding at The Meadows. The Agency's Product 4, which was received on 7th June 2021, is attached to this letter.

As outlined earlier, the development area is situated within FRZ3 (highest risk) in the event that flood defences on the river are breached or overtopped. The only part of the landholding that lies outside FRZ3 is at the northern end, which is already occupied by the campsite reception and owner's bungalow.

The flood defence on the closest stretch of river comprises an earth embankment with stone wall along the section opposite the southern end of the Site. The crest height on the flood defences declines from 8.49 maOD (upstream end) to 7.89 maOD (downstream end); the condition of this defence is reported to be grade 4 (poor).

There has been no change in the status or height of the flood defences since the original FRA was submitted.

5. Risk of Fluvial (River) Flooding

The Historic Flood Map provided by the EA shows that the “Recorded Flood Event Outline” on this stretch of river is confined to “in-channel” (although “the absence of flooding does not mean that an area has not flooded in the past, nor guarantee it will not flood in the future”).

There have been no new flood events since the original FRA was submitted.

Product 4 includes fluvial flood level and flow data from the St Austell White River Estry-TUFLOW Model 2011 for the following scenarios: 1 in 100-year; 1 in 100-year with climate change; and 1 in 1000-year.

As illustrated upon the Model Node Location Map, the closest Model Node is WHIT01.12U.1 (NGR ²00926 ⁰47988). The flood level in the 1 in 100-year event (1% AEP) with climate change is 6.67 maOD. As noted earlier, the downstream crest height on the flood defence is 7.89 maOD.

There has been no change in the flood level dataset since the original FRA was submitted.

The EA’s standing advice for Minor Developments requires that Finished Floor Level (FFL) in new buildings is 300 mm above the estimated flood level. As noted previously, the FFL in the accommodation pods (addressed under previous planning) was set at 6.97 maOD.

The development proposal (as covered by the current planning application) does not involve any building works *i.e.* no physical development; therefore, there is no requirement to specify FFL.

6. Risk of Tidal Flooding

The topographic survey shows that the Site is not at risk of tidal flooding.

7. Risk of Flooding from Rainfall Runoff (Overland Flow)

The Strategic Flood Risk Assessment (SFRA) published by Cornwall Council, together with interactive mapping, shows that risk of surface water flooding extends to cover a very similar area to that affected by fluvial flooding.

Therefore, the same advice (as presented in Section 5) would apply when considering the risk posed by flooding from rainfall runoff (overland flow).

8. Risk of Groundwater Flooding

The Council’s SFRA states that: “*Groundwater flooding is linked to the ability of the ground to hold water. Due to its geology, Cornwall has only minor aquifers (2) and generally does not experience much groundwater type flooding. The exception to this is found in areas that have extensive mine drainage systems, where blockages within drainage tunnels can lead to unexpected breakout of groundwater at the surface.*”

Due to the proximity of the St. Austell River, groundwater levels at the Site are expected to be controlled by the level of the river and its tributary ditches. In conjunction with the advice given above, it is considered that groundwater flooding does not pose a significant risk to the proposed buildings.

9. Surface Water Management

The drainage proposals at the Proposed Development must be measured against the existing performance of the Site, such that there is no increase in flood risk at downstream receptors.

Given that there will be no building works (*i.e.* no introduction of new hardstanding), it follows that there is no increase in flood risk at downstream receptors.

10. Increasing the Length of the Season - Access and Evacuation

The flood events covered by the Estry-TUFLOW Model 2011 (1 in 100-year; 1 in 100-year with climate change; and 1 in 1000-year) could occur at any time/season throughout the year. Therefore, the fluvial flood risk associated with the St Austell White River is not confined to any specific season. For this reason, any decision on the proposed increase to the length of the tourist season should not be influenced by the flood model data.

A flood warning and evacuation plan is a requirement for sites at risk of flooding used for holiday or short-let caravans and camping.

The owner of the campsite should sign up to the Environment Agency flood alert system for the area. This will ensure prior warning of a possible flood event and allow adequate time to prepare for flooding.

In such event, the main access and egress route for the development is on to the B2373 Pentewan Road, which is protected from fluvial flooding by the man-made defences along the St. Austell River.

If the flood defences on the river were breached, the Pentewan Road should not be used. All persons should leave the Site on foot and follow the track going westwards from the northwest corner of the landholding. This track leads on to higher ground; the outer margin of Flood Zones 2 and 3 coincides with the western boundary of the campsite.

11. Residual Risk

The campsite is in the highest risk setting for fluvial flooding (FRZ3). As outlined above, the development must be made as safe as possible by: implementing a flood warning and evacuation plan; by designing buildings to avoid flooding by raising floor levels; and by mitigating the potential impacts of flooding through design and flood resilient and resistant construction.

Residual risks are those remaining after applying the above measures.

Examples of residual flood risk include:

- The failure of flood management infrastructure such as a breach of a raised flood defence, blockage of a surface water conveyance system, overtopping of an upstream storage area, or failure of a pumped drainage system;

- A severe flood event (*e.g.* 200-year return period) that exceeds the flood management design standard, such as a flood that overtops a raised flood defence, or an intense rainfall event which the drainage system cannot cope with.

Flood-resilient buildings are designed and constructed to reduce the impact of flood water entering the building so that no permanent damage is caused, structural integrity is maintained and drying and cleaning is easier. DCLG has published “Improving the Flood Performance of New Buildings: flood resilient construction” (2007). This provides guidance on how to improve the resilience of new buildings in residual flood risk areas by the use of suitable materials and construction details.

In addition, the residual risk of flooding is addressed by ensuring that adequate flood warnings would be available to people using the development. This would need to be covered by the flood warning and evacuation plan.

I trust that the foregoing is suitable for your purposes. Please do not hesitate to contact me on 07773 319271 should you wish to discuss the matter further.

Yours sincerely



Henry Eister

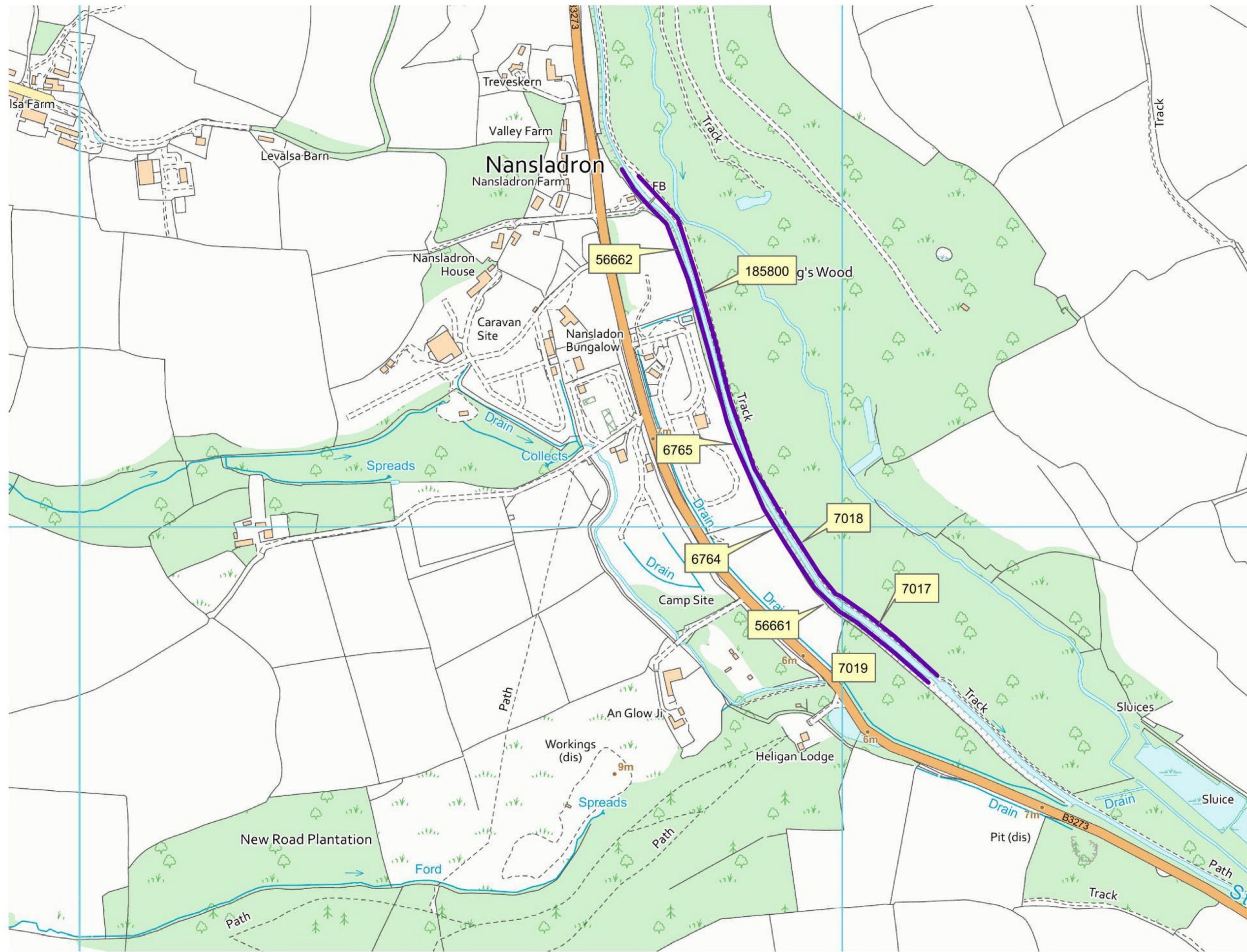
Senior Hydrogeologist

BCL Consultant Hydrogeologists Limited

ENQ21/DCIS/219203 - AIMS Flood Defence Location Map



Please note this map is intended only as a guide - it is not accurate at individual property level



Legend

AIMS Flood Defence Location

This map shows the location of data we hold on the Asset Information Management System (AIMS). Please note AIMS holds information for all main river banks. Therefore this database includes information about all channel, banks and other assets which are not formal raised flood defences. Please refer to the enclosed table for details of this asset.

1:5,000 Correct as of the 07th June 2021

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ENQ21/DCIS/219203 - AIMS Defence Information

Asset Reference	Description	Actual Assessed Standard of Defence	Down Stream Crest Level (mAOD)	Upstream Crest Level (mAOD)	Condition Grade	Rating
7017	Earth Embankment	not available	7.06	7.49	3	Fair
7019	Earth Embankment	not available	6.99	8.18	3	Fair
6764	Earth Embankment With Stone Wall At FO	not available	7.89	8.49	4	Poor
6765	Earth Embankment-Sheet Steel Piles To Cs	not available	8.49	9.05	3	Fair
7018	Earth Embankment	not available	7.49	7.24	3	Fair
56661	Earth Embankment With Piled Wall At CS	not available	8.18	8.79	3	Fair
56662	Earth Embankment	not available	9.04	9.95	3	Fair

185800	Earth Embankment	not available	8.57	9.73	3	Fair
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We do not have a statutory defence level for these defences. This data is extracted from the Asset Information Management System (AIMS). Whilst care is taken to ensure the accuracy of levels, these are not guaranteed and further investigation and / or survey may be required. The database is updated as new information becomes available.

Correct as of 07 June 2021

ENQ21/DCIS/219203 - Flood Map for Planning (Rivers & Sea) centred on Pentewan



Please note this map is intended only as a guide - it is not accurate at individual property level

Legend

-  main river
-  Defences
-  Flood Zone 3
-  Flood Zone 2

Flood Zones are areas, also known as the floodplain, which could be affected in the event of flooding from rivers and the sea. Flood Zones provide a good indication of land at flood risk. Flood Zones are not sufficiently detailed to show whether an individual property is at risk, for example it does not take into account flood defences. Please note that the likelihood of flooding is an assessment based on the information currently available and may change in future due to climate change or other factors.

Flood Zone 3 shows the area that could be affected by flooding, either from rivers or the sea, if there were no flood defences. This area could be flooded from the sea by a flood that has a 0.5 per cent (1 in 200) or greater chance of happening each year; or from a river by a flood that has a 1 per cent (1 in 100) or greater chance of happening each year.

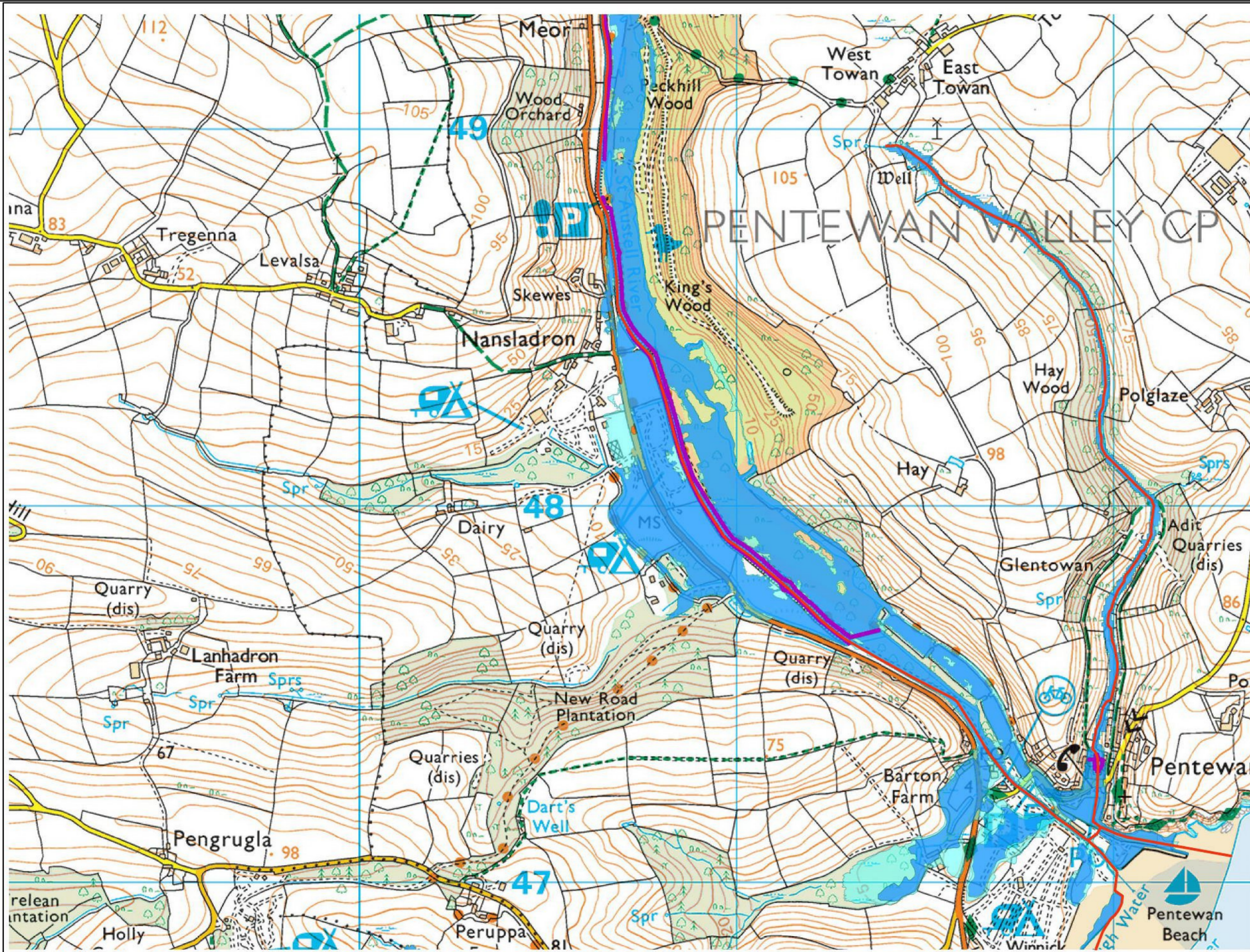
Flood Zone 2 shows the additional extent of an extreme flood from rivers or the sea. These outlying areas are likely to be affected by a major flood, with up to a 0.1 per cent (1 in 1000) chance of occurring each year.

Flood defences, were built in the last five years to protect against river floods with a 1% (1 in 100) chance of happening each year, or floods from the sea with a 0.5% (1 in 200) chance of happening each year, together with some, but not all, older defences and defences which protect against smaller floods.

Flood defences that are not yet shown, and the areas that benefit from them, will be gradually added.

1:10,000 Correct as of the 03rd June 2021 

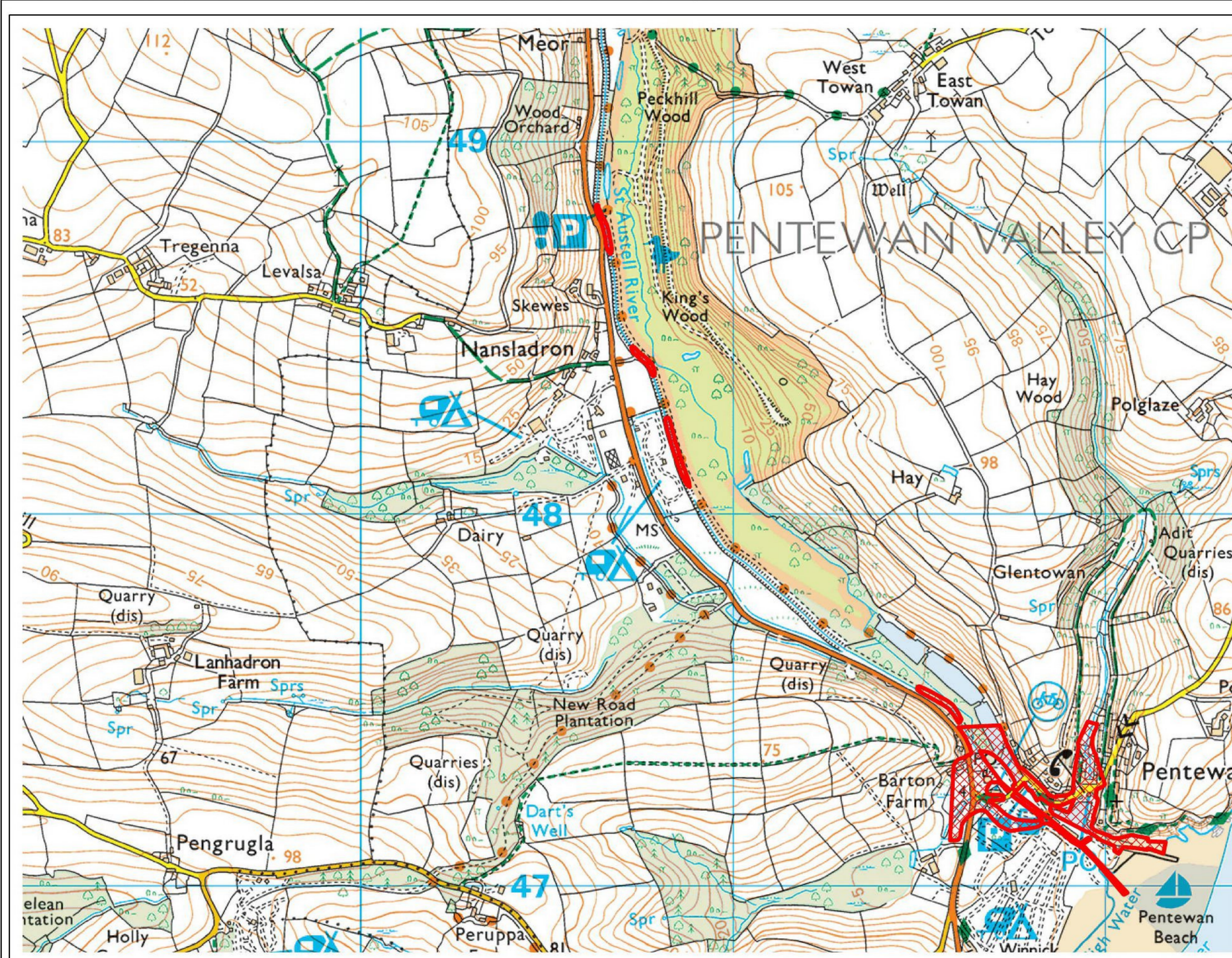
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ENQ21/DCIS/219203 - Historic Flood Map centred on Pentewan



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Legend

 Recorded Flood Outlines

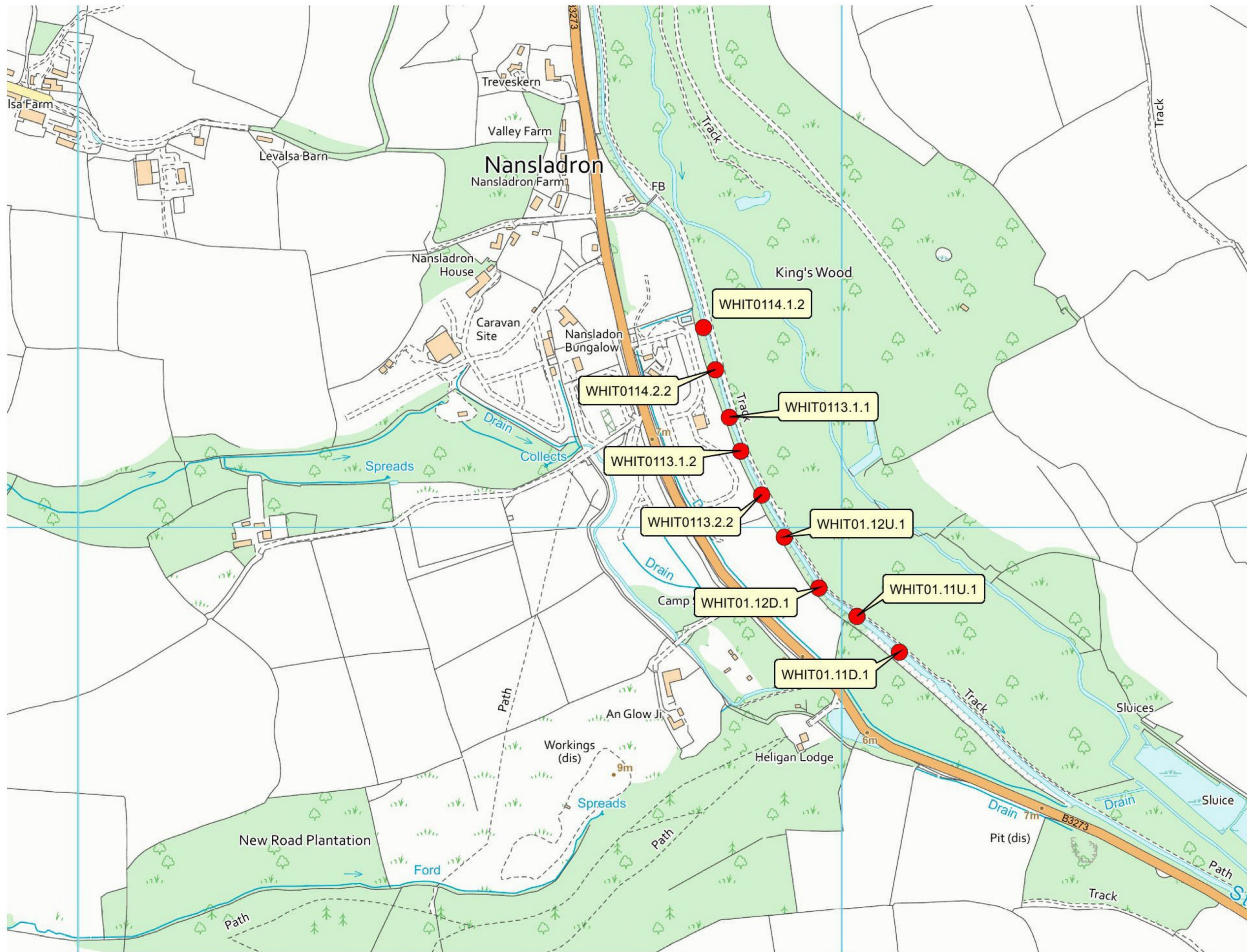
The Recorded Flood Event Outline, shows the extent of known flooding from rivers and the sea. This outline is indicative of the flood extent, and does not necessarily confirm that a property has flooded internally. If an area is outside the extent of recorded flooding, it does not mean it has never flooded. This will be updated as more data comes to light, and as flood incidents occur.

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ENQ21/DCIS/219203 - Model Node Location Map

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Legend

● Model Node Location

Please refer to the enclosed table, for modelled water level data, and the enclosed caveat when considering modelled levels.

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ENQ21/DCIS/219203 - Modelled flood levels and flows

This data is taken from the St Austell White River Estry-TuFLOW Model 2011. Please refer to the attached caveat when considering modelled data.

** For climate change scenarios, 20% has been added to the 1% AEP flows.*

Node Reference	Easting	Northing	Flood levels, in mAOD (undefended model run)			Modelled Flood Flows, in m ³ /s (undefended model run)		
			1% AEP (1 in 100 year)	1% AEP + climate change*	0.1% AEP (1 in 1000 year)	1% AEP (1 in 100 year)	1% AEP + climate change*	0.1% AEP (1 in 1000 year)
WHIT01.11D.1	201076	47837	6.15	6.21	7.25	30.72	38.89	73.59
WHIT01.11U.1	201021	47884	6.35	6.42	7.40	30.82	39.05	72.37
WHIT01.12D.1	200971	47922	6.45	6.51	7.50	29.75	37.27	71.66
WHIT01.12U.1	200926	47988	6.63	6.67	7.71	31.14	39.08	76.82
WHIT0113.2.2	200896	48044	6.84	6.88	7.87	30.71	38.29	71.87
WHIT0113.1.2	200869	48101	7.04	7.08	8.06	30.48	37.65	71.65
WHIT0113.1.1	200854	48145	7.20	7.25	8.23	30.72	37.77	73.92
WHIT0114.2.2	200835	48208	7.38	7.44	8.45	30.81	37.85	76.63
WHIT0114.1.2	200820	48263	7.49	7.54	8.59	30.78	37.83	76.73

Correct as of 07 June 2021

Mr C D Anstis
Chy-An-Glyn
The Crescent
Truro
TR1 3ES

Your ref:
My ref: PA17/03005/PREAPP
Date: 24 November 2017

Dear Sir/Madam

**Pre-application
enquiry reference
Proposal**

PA17/03005/PREAPP

Pre-application advice for new reception and shop, maintenance equipment store, construction of accommodation pods on raised deck, construction of campsite refreshments bar.

**Location
Applicant**

The Meadows Pentewan St Austell Cornwall
Mr And Mrs M Heaslip

I refer to your enquiry received on 1 November 2017 concerning the above and would inform you that this letter is written on the basis of the information supplied with your enquiry and the submitted drawings.

Site and context

The site is located in the open countryside to the west of the B2373 which runs through the Pentewan Valley, with the village of Pentewan 1km to the south and St Austell 4km to the north.

The site is currently used as a camping site and has a bungalow and toilet block on site. Immediately to the north lies a Nursery with large greenhouses on site and the Nansladron Caravan Park while to the east on the opposite side of the road lies another Caravan and Camping site which has a few permanent buildings on site.

The field currently used for camping is shielded from wider views by strong boundaries of mature trees and hedging which restricts any views into or out of the site.

Proposal summary

The enquiry seeks an opinion of whether the provision of a maintenance equipment store sited adjacent the domestic garage 14mx6mx4.3 high; construction of a campsite reception/shop; construction of timber pods 6mx3m plus verandah providing self-contained living, cooking and sleeping space and the construction of a campsite snack and drinks bar reserved for campers would be supported by the Council.

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Constraints

Open countryside location
Adjacent Area of Outstanding Natural Beauty
Flood zone 2,3 and 3b
Agricultural Land Classification - grade 4

Site Planning History

C2/99/00299 Replacement toilet block - Approved

C2/98/01452 Use of land for storage of caravans and for camping by caravans and tents - Approved

C2/97/00416 Use of land in Summer as Touring Caravan and Camping Site with amenity facilities - Refused

Relevant Planning Policies

Under section 38(6) of the Planning and Compulsory Purchase Act 2004 decisions on applications for planning permission and appeals must be taken in accordance with the development plan, unless there are material considerations that indicate otherwise.

The National Planning Policy Framework stresses the importance of having a planning system that is genuinely plan-led. Where a proposal accords with an up-to-date development plan it should be approved without delay, as required by the presumption in favour of sustainable development at paragraph 14 of the National Planning Policy Framework. Where the development plan is absent, silent or the relevant policies are out of date, paragraph 14 of the National Planning Policy Framework requires the application to be determined in accordance with the presumption in favour of sustainable development unless otherwise specified. The three dimensions of sustainable development are Economic, Social and Environmental and should be sought jointly and simultaneously through the planning system.

In Cornwall the development plan comprises the Adopted Cornwall Local Plan Strategic Policies 2010 - 2030 (adopted 22nd November 2016) as well as the 'saved' policies from the adopted Local Plans which include minerals and waste Local Plans.

The Cornwall Local Plan (the CLP)

The following policies are relevant:

Policy 1 Presumption in favour of sustainable development
Policy 2 Spatial strategy
Policy 2a Key Targets
Policy 3 Role and function of places
Policy 5 Business and Tourism
Policy 12 Design

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Policy 13 Development standards
Policy 21 Best use of land and existing buildings
Policy 23 Natural environment
Policy 25 Green infrastructure
Policy 26 Flood risk management and coastal change
Policy 27 Transport and accessibility

Material planning Considerations

The National Planning Policy Framework, March 2012 (the NPPF)

Paragraph 7: Achieving Sustainable Development

Paragraph 17: Core Planning Principles

1: Building a strong, competitive economy

3. Supporting a prosperous rural economy

4: Promoting sustainable transport

7: Requiring good design

10: Meeting the challenge of climate change, flooding and coastal change

11: Conserving and enhancing the natural environment

National Planning Practice Guidance.

Supplementary Guidance/Design Guidance:

Cornwall Design Guide, 2013

Manual for Streets Guidance Documents

Secure by Design

Cornwall Drainage Guidance (2010)

The Cornwall and Isles of Scilly Landscape Character Study

This list is not exhaustive but provides a focus for the key issues against which your scheme would be considered.

Principle of development:

Planning Policy Context

Cornwall Local Plan (CLP):

The CLP sets out that the vision for Cornwall's future is to "achieve a leading position in sustainable living." One of the objectives identified in relation to supporting the economy is that of enhancing "the cultural and tourist offer in Cornwall and to

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continue to promote Cornwall as a year round destination for tourism and recreation".

The supporting text to Policy 5 states in regards to Tourism: "The quality of Cornwall's landscapes, seascapes, towns and cultural heritage, enables tourism to play a major part in our economic, social and environmental wellbeing, it generates significant revenues, provides thousands of jobs and supports communities. Our key challenge is to realise this opportunity in better wages through improved quality and a longer season". Section 3 of Policy 5 provides that: "The development of new or upgrading of existing tourism facilities through the enhancement of existing or provision of new, high quality sustainable tourism facilities, attractions and accommodation will be supported where they would be of an appropriate scale to their location and to their accessibility by a range of transport modes. Proposals should provide a well balanced mix of economic, social and environmental benefits".

National Planning Policy Framework (NPPF):

Paragraph 6 states that 'the purpose of the planning system is to contribute to the achievement of sustainable development'. Paragraph 7 confirms that there are three dimensions to sustainable development: economic, social and environmental. Paragraph 17 identifies the need to manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. Paragraph 61 stresses that planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.

Paragraph 28 sets out that in order to promote a strong rural economy there should be support for sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres.

Assessment of principle of development

Principle of development:

This proposal seeks an extension and upgrading to the existing facilities building within this established tourism site; the principle of such proposals which allow existing rural businesses to develop and expand is supported by both national and local planning policy.

Landscape:

Local and national policy seeks to protect, conserve and enhance the natural and historic landscape whether it is designated or not. As highlighted above the site in its predominantly undeveloped state (together with the perimeter vegetation around its perimeter) contributes to the natural beauty and historic context of the landscape.

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The introduction of structures / artefacts and human influences into the landscape associated with the proposed use has the potential to erode the natural qualities of the site and its contribution to the wider landscape.

There are four elements within this proposal and three of them can be grouped together the store, shop and snack bar. Having visited the site there is already an existing bungalow and toilet block on the northern end of the site which sits next adjacent to the nursery while the rest of the site has a rural feel.

The details provided show the store and shop to be located at the northern end of the site with the snack bar at the southern end, it would seem much more logical to site all three units at the northern end.

The buildings are set back from the highway and can only be glimpsed from the road at the entrance point. Small scale additions would be considered to be of an appropriate scale, massing, siting and design to remain in keeping with the tourism based appearance of the site as a whole.

The construction of timber pods 6mx3m plus verandah providing self-contained living, cooking and sleeping space at the southern end of the site would provide permanent accommodation on the site of a touring camping site.

Having viewed the site I am of the opinion that the positioning of the proposal would be acceptable but would be dependent on the design and quality of materials if you were to submit a full application in order to meet the policy of the enhancement of existing accommodation through high quality provision.

Whilst the proposal would to some degree increase the prominence of the building within the immediate area, this impact is not considered to be significant, given the set back from the road and natural screening provided by boundary trees, as such and being mindful of the existing use of the site the proposal is considered to preserve the character and appearance of the surrounding landscape and would cause no significant harm to the adjacent AONB.

Design

Policy 12 of the CLP sets out that: "The Council is committed to achieving high quality safe, sustainable and inclusive design in all developments. Development must ensure Cornwall's enduring distinctiveness and maintain and enhance its distinctive natural and historic character. Development should demonstrate a design process that has clearly considered the existing context, and how the development contributes to the social, economic and environmental elements of sustainability through fundamental design principles".

The NPPF sets out that any application will be required to convey good quality design in respect to layout; sustainability credentials; landscaping; and palette of surfacing materials.

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Design advice is set out in the Cornwall Design Guide (available to view on the planning policy page of our website).

I must stress the importance of the submission of a Design and Access Statement which clearly identifies the evolution of your proposals design, how the proposals have changed in response to pre-application advice, public consultation and the findings of your various technical assessments and how you have reached your final design.

I would recommend the use of natural materials in order to minimise the visual impact of any new buildings.

Highways and access

The Highways Officer has not been consulted on this application but I do note that this is an existing camp site which already has an access onto the B2373.

Flooding:

The majority of the site lies within flood zones 2, 3 and 3b. In this regard I strongly advise making early contact with the Environment Agency, in order to clarify exactly what they would expect to see submitted as part of the Flood Risk Assessment, and in order to ensure that by the time a planning application is submitted that it would have already addressed their concerns.

Drainage

Should you decide to submit an application, full details should accompany any planning application that may be submitted indicating the method of foul and surface water treatment to serve the development being proposed.

Ecology

An initial 'Phase One' ecological survey to identify the likelihood or otherwise of the presence of the habitat(s) of protected species would be required together with, if habitat for protected species is identified, follow-up species-specific surveys and details of suggested mitigation and improvement measures.

Minerals Safeguarding Area

The Minerals team have been consulted and have the following comments:

The proposed development falls within a Mineral Consultation Area which is subject to Policy S1 of the Cornwall Minerals Local Plan 1997. The Mineral Consultation Areas are being reviewed through the preparation of the Minerals Safeguarding Development Plan Document (DPD). The DPD has been submitted to the Government for independent examination and, in accordance with the NPPF (paragraph 216), the emerging policy and Mineral Safeguarding Areas can be given considerable weight.

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The proposed development falls within a Mineral Consultation Area that has been designated around Dairy Quarry, an aggregate quarry which has active planning permission (although it is not currently operating).

The proposed development is on an existing campsite and the proposed pods are located approximately 130 metres from the inactive quarry and I would therefore recommend a temporary use of the site in line with current uses. I therefore do not consider that the proposed development conflicts with Policy S1 or any other Minerals Local Plan policy. However, the applicant should be advised of the proximity of the quarry and that noise and blasting vibration may be of concern to any future residents.

Contaminated land:

Please see the Council's guidance regarding information requirements for planning applications via:

<http://www.cornwall.gov.uk/media/27684021/land-contamination-guidance-july-2017-v11-final.pdf>

Community engagement:

As with any planning application we strongly advise applicants to contact and consult with the local residents, the local ward member and the Parish Council to discuss proposals in advance of submission of any planning application.

You can contact Pentewan Valley Council on julielarter.parishclerk@hotmail.co.uk or 01872 501101. The local Cornwall Councillor is James Mustoe CC, james.mustoe@cornwallcouncillors.org.uk or 01726 76210.

Consultees:

The following would be consulted in respect of any planning application:

- o Pentewan Valley Parish Council;
- o Neighbouring residents;
- o Cornwall Council Environmental Health Officer;
- o Cornwall Council Highways Development Management Officer;
- o Cornwall Council Drainage Officer;
- o Cornwall Council Forestry Officer;
- o South West Water.

Planning Performance Agreement:

The Council offers the opportunity for applicants to enter into a Planning Performance Agreement (PPA) with the Council. PPA's are a framework for local authorities and applicants to agree how development proposals should be managed through the

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planning process. They are a useful tool of good development management and are appropriate for those who require ongoing advice on complex proposals. There are a number of benefits in using PPA's which include reduced risk and increased certainty, early identification of issues and improved partnership working. Further information on PPA's can be found here: <http://www.cornwall.gov.uk/default.aspx?page=29360>

Please let me know if you wish to proceed with a PPA and we can discuss the form and content of the PPA together with the fee.

Building Regulations:

Cornwall Council's Building Control Service is pleased to offer a free initial pre-application advice service for all your development enquiries. Building Control can advise whether a Building Regulations application is likely to be required for your proposal, can give valuable time-saving guidance on how to meet the requirements of The Building Regulations and can suggest possible ways of resolving any notable issues prior to you submitting any formal Planning Permission applications that may be required. Building Control's Extended Services team can offer SAP, SBEM and Air-Permeability Testing Services, as well as access to warranties and other related services.

The Building Control surveyors covering your area can be contacted at Building Control, Cornwall Council, Circuit House, Pydar Street, Truro. TR1 1EB, by phone on 01872 224383 or by email at: buildingcontrol.central1@cornwall.gov.uk

Conclusion:

In conclusion, in my opinion, the proposal as outlined is capable of gaining officer support, subject to the incorporation of the advice above.

I hope that you find the above advice helpful.

You should note that this letter does not constitute a formal decision by the Council (as local planning authority). It is only an officer's opinion given in good faith, and without prejudice to the formal consideration of any planning application. However, the advice note issues will be considered by the Council as a material consideration in the determination of future planning related applications, subject to the proviso that circumstances and information may change or come to light that could alter the position. It should be noted that the weight given to pre-application advice notes will decline over time.

Yours faithfully

Paul Webber

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**Principal Development Officer
Planning and Sustainable Development Service
Tel: [REDACTED]
Email: planning@cornwall.gov.uk**

You asked us to provide you with depth / flow / water level data from the St Austell White River Estuary-TUFLOW model, 2011.

You should be aware of the following points, when considering modelled water levels:

- The maps produced as part of this commission do not show localised flooding resulting from intense rainfall and where surface flow might exceed the capacity of the drainage system. Likewise, the flood maps produced for this study do not show areas where overland sheet flow or runoff might cause flooding.
- The latest National guidance provided by the Environment Agency has been followed when identifying and including flood defences in the hydraulic model. This guidance states that flood defences should be assumed to be in perfect condition. This may not reflect reality and thus the condition of flood defences should be considered when undertaking site specific flood risk assessments.
- The undefended model scenario is based on a situation where all formal defences along have been removed. The reality of such a scenario should be given adequate consideration
- In the White River catchment, the LIDAR has been poorly filtered, particularly through St Austell where there is dense vegetation along the channel in some locations. The filtered LIDAR in these locations suggests the channel is wider than suggested by the more detailed channel survey. Topography fixes have been applied in these locations based on bank levels obtained from the topographic survey. There may be limitations to this approach as localised variability in the channel bank levels may not be fully represented in the model. Within St Austell this is not thought to be too significant as the channel has a sufficient capacity to convey flood flows. This limitation is not relevant to the White River between the outskirts of St Austell and Pentewan, as extensive topographic bank survey has been collected for these locations.
- The Polgooth Stream enters a series of culverts beneath Tyshute Lane and Fore Street. Culvert survey was not available and the geometry has been defined using best available data from design drawings. The model inflows are applied directly to the channel and account for all water running off the catchment. The embankments along the White River are however likely to prevent some surface water runoff from entering the channel and may result in water ponding behind them. This could therefore result in flooding on the ground that is not represented by the model for the 1% AEP event and below as the water is contained in the channel by the embankments for these events.
- The maps and digital data supplied should be considered only a summary of the conclusions of the study. It will be necessary to collect more detailed topographic information for particular sites where development is proposed and undertake a more detailed site-specific hydrological and hydraulic analysis for the location under study using guidance from the National Planning Policy Framework (NPPF).
- In this commission the focus has been on flooding from fluvial sources rather than tidal inundation.
- The data provided is not calibrated or verified
- Any assessment of Flood Risk undertaken must be appropriate for the decisions that need to be based upon it, consider the risks and also take into account any limitations of the data used.
- Please be aware that the Environment Agency does not guarantee that this data is suitable for your purposes.