

Biodiversity and Geological Conservation

supporting document for the application

Temporary installation of transmit (TX) array and a receive (RX) antenna array

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The development site is situated in the broader Cligga Head area of Perranporth, Perranzabuloe, Cornwall, England, UK (Figure 1). This area is designated as a Site of Special Scientific Interest (SSSI) under the Wildlife and Countryside Act (1981). The University of Plymouth's scientific team is fully aware that SSSIs are among England's most vital areas for wildlife and natural features. These sites support numerous unique, rare, and endangered species, habitats, and natural features. We are committed to utmost respect in preserving their biodiversity and geological value.

Cligga Head is a coastal site with species-rich maritime heathland and grassland, covering an area of 113.5 hectares. Notably, the cliffs and adjacent mine workings hold exceptional geological interest, revealing greisenized granite and rare minerals.

The development site aims to enhance the existing system at Perranporth Airfield by introducing an additional frequency (Figure 2) for testing vessel monitoring within UK territorial waters. This upgrade is projected to be operational over a period of 6 to 12 months. The current system has been operational since 2011, providing the scientific team with an extensive understanding of the site's characteristics and preparedness to ensure its preservation.

Furthermore, information on Sites of Special Scientific Interest (SSSIs) was retrieved from Natural England's Open Data Publication on the Defra group's ArcGIS Online platform (<https://naturalengland-defra.opendata.arcgis.com/>). Additional data on the natural environment was sourced from Defra's MAGIC website (<https://magic.defra.gov.uk/home.htm>).

According to Defra, the only protected species nearby are seabirds' nests (Figure 3), located close to the coastline and at least 250 meters away from the nearest aerial, which is positioned on the hill. Hence, these species are unlikely to be affected by the project.



Figure 1. The wider area of Cligga Head (SSSI) where the development site belongs (Source: <https://naturalengland-defra.opendata.arcgis.com/>)

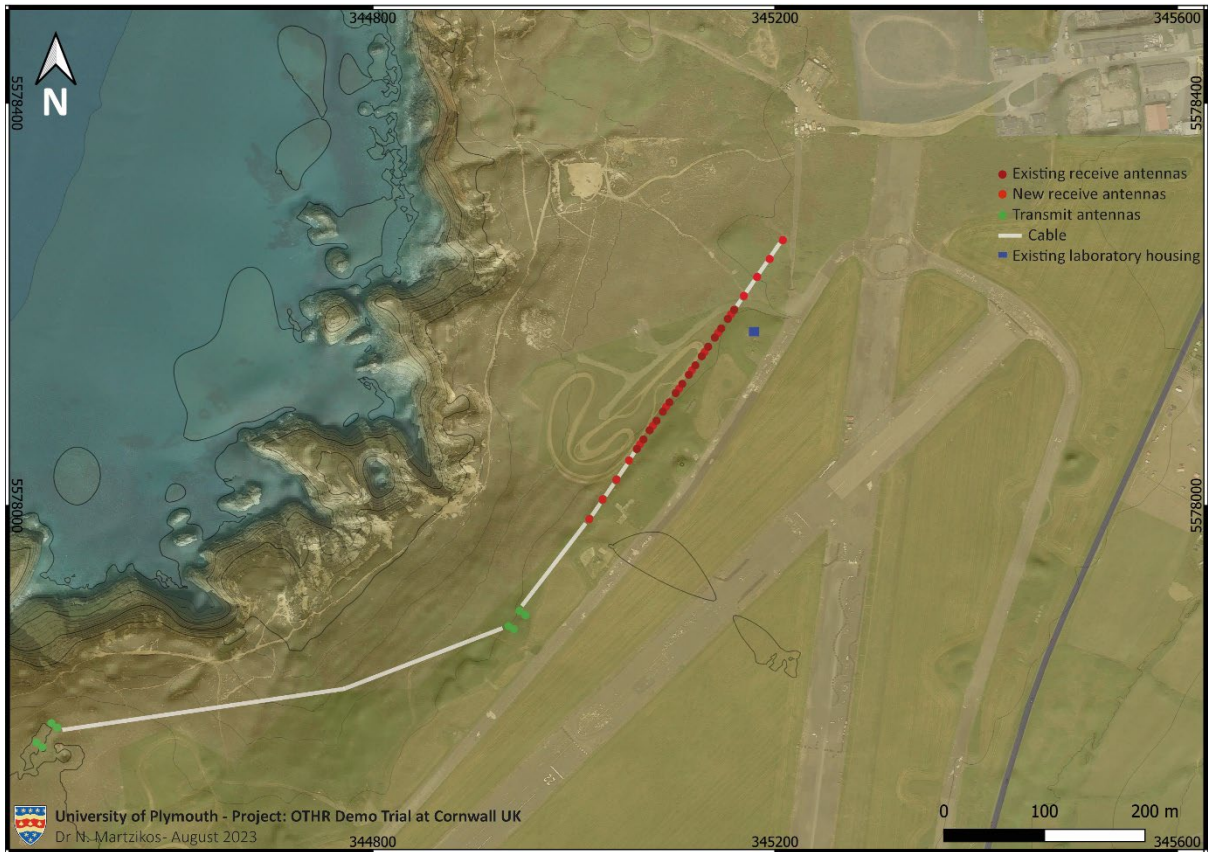


Figure 2. The location plan of the development site in Perranporth Airfield in Cornwall.



Figure 3. The location of the Seabird Nesting Counts according to magic.defra.gov.uk

Defra's inventory identifies Maritime Cliffs and Slopes and Lowland Heathland in the broader area (Figure 4). Although the development site is situated at a reasonable distance from the cliffs, it's important to note that lowland heathland, found in relatively low-lying areas, is a distinct habitat characterized by open landscapes on acidic mineral and shallow peat soil. It features plant species such as heathers and dwarf gorses, which we are dedicated to conserving.

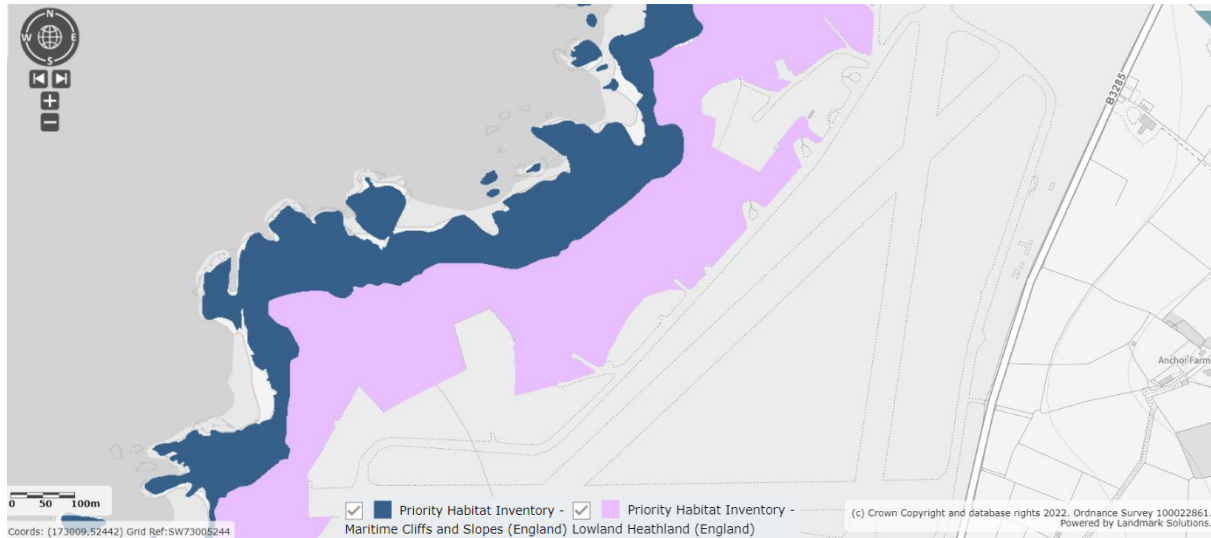


Figure 4. Priority Habitats Inventory about Maritime Cliffs and Slopes and Lowland Heathland according to magic.defra.gov.uk

Although the application site is part of the SSSI, the proposed development is not anticipated to adversely affect biodiversity or geological conservation. It is unlikely to impact a) protected and priority species, b) designated sites, important habitats, or other biodiversity features, and c) features of geological conservation importance. The development is designed with minimal environmental impact, avoiding excavation or disruption of sensitive areas and old mines. Aerials will be securely anchored using non-intrusive methods such as aluminium stakes, without causing damage to the Site of Special Scientific Interest (SSSI). Additionally, their cables will be laid in plastic conduit on the ground, rather than being buried, for the connection to the laboratory housing.

Finally, the scientific team at the University of Plymouth, overseeing the radar station's operations, is dedicated to the long-term monitoring of the site during its operation. This commitment ensures the effectiveness of mitigation measures and the preservation of the site's biodiversity and geological value, safeguarding it from any adverse impacts.

An old letter from Natural England from the initial application is attached in the Appendix for completeness.

References

[Magic Map Application \(defra.gov.uk\)](http://magic.defra.gov.uk)

[Sites of Special Scientific Interest \(England\) | Sites of Special Scientific Interest \(England\) | Natural England Open Data Geoportal \(arcgis.com\)](#)

[Cligga Head, Perranporth, Perranzabuloe, Cornwall, England, UK \(mindat.org\)](http://mindat.org)

[Mapp - Cligga Head SSSI \(johnblanchard.net\)](http://johnblanchard.net)

[Lowland heathland \(UK BAP Priority Habitat description\) \(jncc.gov.uk\)](http://jncc.gov.uk)

<https://variscancoast.co.uk/cligga>

Your Ref: PA10/05731
Our ref: LA/2/50
Date: 11th September 2010

Cornwall Council
Cornwall Council (Central 1 Area)
Circuit House
St Clement Street
Truro

For the attention of: James Holman



Natural England
Pydar House
Pydar Street
Truro
TR1 1XU
Tel: 0300 060 2544
Fax: 0300 060 2545

Dear Sir

Proposal: Temporary installation of transmit (TX) array, a receive (RX) antenna array & a laboratory cabinet

Location: The Airfield, Higher Trevellas, St Agnes

Thank you for consulting Natural England on the above proposal. Your letter was received by this office on the 20th October 2010.

The application site is partly located within the Cligga Head Site of Special Scientific Interest (SSSI). This reply comprises our statutory consultation response under the provisions of Article 10 of the Town and Country Planning (General Development Procedure) Order 1995 and Section 28 of the Wildlife and Countryside Act 1981. From the plans submitted it appears that the TX antenna and a very short section of electrical and phone cables may be installed within the SSSI. However, it is understood from the Design and Access Statement that accompanies the application that the cables will be placed on the surface, eliminating the need for any excavations within the SSSI. In addition, the antenna will be located along the line of an existing fence and where possible will use existing posts.

The cliffs and adjacent mine workings are of outstanding geological interest exposing greisenized granite and rare minerals. The location of the proposed transmitters is rich in mine workings and it will be important to ensure that disturbance of the mine spoil/ mine workings is kept to a minimum. The proposed development is considered unlikely to significantly affect the SSSI in the long-term, subject to suitable methods being used for installation and removal.

Natural England has no objection to the proposed development in relation to biodiversity, subject to the following conditions being implemented to avoid any long-term adverse impacts on the SSSI features of interest:

1. No heavy machinery to be used for installation or decommissioning of equipment within the SSSI without prior agreement in writing from Natural England.
2. Disturbance of the ground to be kept to a minimum, by the re-use of existing posts for installation of TX antenna where possible.
3. Prior to any excavations being carried out within the SSSI mineral rich topsoil/ heathland/grassland turves should first be removed, carefully stored, and then restored to their former locations once the work/antenna installation is complete.

4. No imported materials, including concrete, to be used for infilling trenches or excavations for fence posts, within the SSSI, without prior agreement in writing from Natural England.
5. All antenna, cabling and associated infrastructure to be removed from site at the end of the project.

If your authority decides to allow the development without applying the requirements/conditions set out above it must notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, it has taken our advice into account. It must then allow a further period of 21 days before the development can commence to allow us to consider any further action. For further details of these requirements, and a summary of the legislation protecting SSSI's and the duties which apply to planning authorities, please refer to Part II of Circular 06/2005¹.

Natural England in Cornwall will not, except in exceptional circumstances, object to or provide detailed or case-specific advice on protected species. This should not be interpreted as a statement that there are no potential impacts on protected species and other bodies and individuals may wish to comment. As the local planning authority Cornwall Council has a duty under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 to have regard to the conservation of biodiversity in exercising its functions. This duty includes the requirement to have regard to protected species.

The protection afforded these species is explained in Part IV and Annex A of ODPM Circular 06/2005 to PPS9 Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System. The presence of a protected species is a material consideration when a local planning authority is considering a development proposal that could result in harm to a species or its habitat. If there is a reasonable likelihood of a protected species being present which could be affected by a development then you should require the applicant, through a professional ecological consultant, to provide the following information prior to determination:

1. **Survey** - thorough and robust survey of the development site and any other areas likely to be affected by the proposals for protected species;
2. **Impact assessment** – clear assessment of the likely impacts of the proposal upon protected species;
3. **Mitigation strategy** – to clarify how the likely impact will be addressed in order to ensure no detriment to the maintenance of the population of the protected species at a favourable conservation status. This should be proportionate to perceived impacts and must include clear site-specific prescriptions rather than vague, general or indicative possibilities; and
4. **Delivery mechanisms** – to include additional information as appropriate to the mitigation strategy that will be required to ensure that the proposed mitigation works are feasible and deliverable e.g. architects plans, licensing arrangements, planning agreements, contractors' precautionary method statements.

Such information should only be left to coverage under planning conditions in exceptional circumstances.

I also recommend that in considering this application you take into account the guidance set out in *Biodiversity and Geological Conservation: Planning Good Practice Guide for Cornwall*

¹ Government Circular: Biodiversity and Geological Conservation – Statutory obligations and their impact within the planning system ODPM Circular 06/2005/Defra Circular 01/2005
<http://www.communities.gov.uk/index.asp?id=1144318>

(Nov 2007) jointly produced by the former local planning authorities in Cornwall, The Environment Agency, Cornwall Wildlife Trust and Natural England.

Applicants should be informed that planning permission, if granted, does not absolve them from complying with the relevant law, including obtaining and complying with the terms and conditions of any licences required.

In relation to landscape impacts, we note that the application site is within the Cornwall AONB and consequently there may be visual impacts on the AONB. AONBs have been confirmed by the Government as having the highest status of landscape protection and should be given great weight in development control decisions with development proposals being subject to the most rigorous examination. We draw your attention to PPS7 paragraphs 21, 22 and 23. We recommend that you consult with the Cornwall AONB unit and that their advice is taken into full account. Natural England is a member of the AONB partnership and we advise that the AONB unit is best placed to give more detailed advice on landscape issues with respect to the AONB.

Please do not hesitate to contact me if you have any questions or if you require more information.

Yours sincerely

Clare FitzGibbon
Conservation and Land Management Adviser

Annex - General duty towards biodiversity

From 1 October 2006, all local authorities and other public authorities in England and Wales have a duty to have regard to the conservation of biodiversity in exercising their functions. The duty aims to raise the profile and visibility of biodiversity, to clarify existing commitments with regard to biodiversity, and to make it a natural and integral part of policy and decision making. The duty is set out in Section 40 of the Natural Environment and Rural Communities Act (NERC) 2006, and states that:

“Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”