

## Penzance Neighbourhood Plan Regulation 14 Consultation - Historic England Comments.

Our reference: PL00776342

Dear James Hardy,

Many thanks for your email of 17 October 2022, inviting us to comment on the Regulation 14 draft of the Penzance Parish Neighbourhood Plan.

We welcome the many revisions to the text that have been informed by our guidance and have incorporated our previous comments. In particular, we welcome the redrafting of Policy DDH2: Development and Heritage Assets, which is a positive response to our previous advice.

Our role as a national statutory consultee for Neighbourhood Planning focuses mainly on ensuring there is no risk of undue harm to heritage assets. The most common way that risk of harm emerges in Neighbourhood Plans is when new, site-specific allocations for development are being made.

Where a neighbourhood plan recommends a site to be allocated for development, there is a risk that heritage assets may be harmed as a result of that development. Therefore, when such allocations are proposed, we look to see that they are supported by appropriate evidence to demonstrate conformity with national policy for the protection and enhancement of the historic environment, as set out in the National Planning Policy Framework (NPPF). Such evidence ought to demonstrate that there is not the potential for significant environmental effects, in terms of harmful impact to heritage assets.

We note that the draft Neighbourhood Plan itself does not make specific site allocations for housing, above and beyond those inherited from the Local Plan, or the Cornwall Site Allocations Development Plan Document (DPD). However, we can see that there are many policies that name sites where mixed-use, commercial, or urban realm development is recommended, or supported.

Given this, we would usually expect to see a heritage-based justification that explored the potential risk of harm to heritage assets at each named site. It would be normal to have a brief assessment, at each named site: a narrative and recommendations as to how any proposed development might avoid, or mitigate potential harm. Currently, such justifications for development do not seem to be present in either the Neighbourhood Plan or the SES Environmental Report.

It would be wise to review all policies for named sites where development is being supported. Here are some examples of where harm to heritage assets may be a concern and an assessment / justification may be required :

- PEN7 Harbour and Headland (page 136)
- PEN8: Harbour Carpark (page 137)
- PEN9: Vitality of the Promenade (page 137)
- PEN10: Mounts Bay Linear Park (page 138)
- NEW6: The Old Bottle Top Factory (page 152)
- NEW8: Penlee Quarry - Pippoon Lagoon (page 155)
- NEW9: The Heritage Harbour - Old Quay (page 156)
- NEW10: The Village Square (page 157)

- NEW11: The Old Iceworks (page 158)

This exercise may reveal that there is little, or no risk of harming heritage assets. However, it may also reveal that heritage assets could be at risk from these policies, in which case a justification should be provided. We recommend that the Planning Group seek the advice of their Local Authority Conservation Officer, who is best placed to suggest suitable ways forward. It is possible that revisiting the SEA to include a narrative on the potential areas at risk of harm may suffice.

I hope that our response has been helpful. We wish you well with your on-going work and look forward to having an opportunity to make further comments at the regulation 16 stage.

Kind Regards,

Alan

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