

## Penzance Neighbourhood Plan Regulation 14 Consultation – Response to Historic England.

Thank you for your helpful comments. As you have noted the draft Neighbourhood Plan neither allocates housing nor any other sites (mixed use, employment or urban regeneration). While the development proposals included in the Cornwall Site Allocations DPD for sites in Penzance and Newlyn, and other potential projects shown on Map 16, are supported by Neighbourhood Plan policies, they were not designed and scoped for the Plan nor are they fully scoped by the project proposers at the time of writing. As a result, the Neighbourhood Plan strategy is to put in place policies which, whilst supporting the aims of the proposals, ensure that they meet certain key criteria. The Plan recognises that the Parish, and in particular Penzance and Newlyn, has a wealth of Heritage Assets; seeking to secure enhancement, where possible, and protection from harm is clearly one of those criteria. We draw your attention to:

- 6.4.2 **Key Objectives** for Penzance Town Centre & Waterfront which include the following:
  - *Breathe new life into our heritage buildings and seek new uses for vacant, redundant/underutilised buildings and sites to support town centre living and to support and promote growth and development in priority business sectors*
  - *Respect the quality, value and heritage of buildings in the town centre*
- PEN4 and PEN5 which address development in the historic core of the town centre and the wider town centre respectively:
  - PEN4.1.iii *design respects the historic and local character and appearance of the area, particularly the setting of the Market House and other Listed Buildings, and is informed by a heritage impact assessment or statement where appropriate and reference to this Plan’s Design Principles (Appendix 5).*
  - PEN5.1. ii *.....are designed to respect the historic and local character and appearance of the area, informed through a heritage impact assessment or statement where appropriate and reference to this Plan’s Design Principles (Appendix 5).*
- 6.5.1 **Newlyn Context** “Heritage assets are intertwined into the fabric of Newlyn. Of particular note are the Old Ice Works opposite the harbour, the Pilchard Works in The Fradgan, St Peters Church in the Coombe, and the many Methodist chapels.”
- 6.5.2 **Key Objective** for Newlyn “*Future-proof buildings and infrastructure*” includes the following:
  - take advantage of existing buildings through regeneration and reuse, and find innovative ways to make better use of them;
  - seek to ensure that new buildings respect their setting;
- The heritage value of individual sites in Newlyn is recognised –
  - “The South Pier and Observatory are prominent historical assets in the harbour. Better use of these could be made through improvements to access to and along the pier. Any proposals for enhancements should respect the heritage value of the assets and the role they have played in Newlyn’s history as a working fishing port”;
  - “The heritage harbour (old quay) forms a key component of Newlyn’s rich history and identity. ....This Plan supports enhancements to the historic quay and access to it where its status as a key heritage asset and listed structure is respected and enhanced.”
  - “The former (Old) Ice Works in Newlyn has a rich history and is a valued part of Newlyn heritage. The building occupies a prominent location on the former waterfront of the historic working Newlyn fishing port. “

and the relevant policies require that proposals enhance, and have no adverse impact on, their heritage value. However, the benefits of a heritage-based justification that assesses the risk of harm to the heritage value of identified sites is recognised, and it is agreed that a specific requirement is included in the relevant site policies for development proposals to demonstrate, through a Heritage Impact Assessment, that they have examined the potential risk of harm to heritage assets and that the proposal will cause no harm to heritage assets or mitigate potential harm (and in doing so, meet the requirements of Policy DDH2: Development and Heritage Assets). The Strategic Environmental Assessment (SEA) has considered this approach and Cornwall Council have been consulted. The wording has been added to policies PEN7 Harbour and Headland, PEN8: Harbour Carpark, PEN9: Vitality of the Promenade, PEN10: Mounts Bay Linear Park, NEW6: The Old Bottle Top Factory, NEW8: Penlee Quarry, NEW9: The Heritage Harbour - Old Quay, NEW10: The Village Square and NEW11: The Old Ice Works. Policy DDH2 is also amended to reflect this approach.