

**Penzance Neighbourhood Plan Regulation 14 Consultation –
Response to Tetlow King Planning (rep. Live West)**

Local Green Spaces

1. It is not agreed that the designation of local green spaces will “stifle” future development opportunities, given the range of allocated and other opportunities available, or that it is “anti development”. (see Housing response 64). Neither will it inhibit the refurbishment of existing residential accommodation. The quality of existing residential environments is an important consideration as well as the provision of new affordable housing, and Local Green Spaces, large and small, make a significant contribution to that quality and the health and well being of residents, particularly in neighbourhoods where there are higher levels of social deprivation. In addition, Policy GI1 reiterates NPPF guidance that any development of Local Green Spaces will be managed in accordance with national policy for Green Belt. This allows for the importance of the space to be weighed against the importance of the proposed development in considering planning applications.
2. The submission fails to recognise the significance of Cornwall Council’s audit of open spaces as the context for the designation of LGS sites in the Plan area.

The audit identified a lower than average level of natural space in the Penzance / Newlyn area “160. The key observations of the existing provision are as follows:-

- **Lower than typical level of natural space** (type 2) – 27% lower than median level unusually so for a coastal town. There is some compensation from additional beach available during low tide and outside of the study boundary towards Marazion.
- **Lower than average provision in overall outdoor sports space** (3 & 8). The average level of typ.8 sports is relatively high on account of the number of golf courses adjacent to other towns. If we extract the tennis and bowling, combined the provision of sports pitches is just below the standard based upon current demand (14.9m²/person) identified in the draft Cornwall Sports Pitch Strategy. This would however also require that all school sports pitches were made available for formal community use.
- **Higher than average level of equipped provision for teenagers** (5) – 61%
- **Very high level of allotment space** (6). Despite containing the 2nd highest provision per head of allotments out of the 16 towns studied (> double average), an audit in 2008 recorded a significant waiting list. Small garden sizes are probably a key factor.

161. The draft Cornwall Sports Pitch Strategy predicts a shortfall in junior & mini football pitches and full size & mini rugby pitches in the community network area, and recommends increasing community use of playing pitches on education sites.”

The audit provided the basis for standards and policies in the adopted Cornwall Site Allocations DPD, in seeking contributions towards or provision of additional green space, as well as the basis for the approach to designating LGS sites in the Neighbourhood Plan.

Open space provision in the area had not increased since the audit was carried out and it was considered important, therefore, to protect most of the sites identified as well as a small number of other sites identified by local communities.

It should also be recognised that the number of Local Green Spaces designated are spread across the Plan area which includes six separate villages as well as the town; in addition, the town includes a number of individual neighbourhoods where the provision of easily accessible local green space is important.

3. The NPPF (paragraph 101) is clear that the designation of Local Green Spaces “allows communities to identify and protect green areas of particular importance to them”. The importance of green spaces was evident in various community meetings in the initial stages of the Plan, and is reflected in Community Vision statements prepared by local community groups. These meetings, and Vision statements, informed the Questionnaires which sought to establish the relative importance of different issues to each community. The designated sites are consistent with local planning of sustainable development and complement planned investment in housing, employment opportunities and essential services; in particular they are complementary to the Neighbourhood Plan’s emphasis on regeneration of previously developed land wherever possible rather than green field sites.
4. Each site has been assessed against the NPPF criteria in paragraph 102; all are within or close to the relevant local community and have a particular local significance. The criteria do not require each Local Green Space to be open to general view, or to be special because of its beauty specifically. Particular importance may relate to the contribution the space makes to the immediate environment of a group of dwellings or to the wider street scene and sense of place. Even a small space may provide the only opportunity close to home for sitting outside, for appreciating a tree, or plants, or for planting a wild flower patch, supporting insects and other wildlife (as has been done in the Treneere and Lescudjack neighbourhoods). In the Alverton and Treneere neighbourhoods of the town larger and small green spaces are a core element of the 1930s and ‘40s planned estate layouts, and were, prior to transfer of the Council’s housing stock to Live West’s predecessor, publicly owned and managed for the benefit of those communities.
All these factors contribute to their local significance and particular importance to the relevant communities.
5. As recognised by the submission, green spaces are protected by Policy 25 in the Cornwall Local Plan. However, while the strategic policy protects green infrastructure generally, including green spaces, the Neighbourhood Plan policy adds specific guidance at a local level, with Local Green Spaces providing an important element of green infrastructure alongside green routes and sites of recognised biodiversity value.

Importance of individual sites

6. **Allotments** – sites 20 and 22, Mount Misery and Mount’s Bay Road.
There is no NPPF requirement for LGS sites to be open to general view; the sites are local in character, part of the estate layout and making a positive contribution to the environment of surrounding dwellings. However, their particular value is as allotment space within an area of high and continuing demand. Penzance Council updates the waiting list for allotments regularly; in w/c 20th March 2023, there were 163 people recorded, with 16 of those registered for spaces in the immediate vicinity of the designated sites and a further 25 in the Alverton area. The availability of allotments often means people having to travel to sites outside the town and retaining those within the urban area, in walking distance of home, is important. It is not agreed that CLP policy 25 provides appropriate guidance at the locality level.
7. **Alverton Playing Field, Mount Misery** – site 21
At least twenty dwellings back directly on to the site and it is easily accessible from the surrounding area. The NPPF criteria do not require a LGS to be open to general view for it to be local in character. The site provides the only publicly accessible playing field for the Alverton area, with the nearest alternatives being a much smaller informal open space at Love Lane (LGS 33), an open space in Newlyn (LGS 14) or playing pitch in Newlyn Coombe (LGS18), none of which are close or safely accessible to the surrounding housing, much of which is occupied by families with children. The site has been in use as a playing field since the estate was developed; the land was purchased in 1948 by the then Penzance Borough Council and a post war housing estate plan approved by the Minister for Housing and Local Government in

1952 shows the site as recreation land (*copies of these documents will be held by Live West as current owners*).

Prior to the Neighbourhood Plan consultation events the importance of the green space to the Alverton community was already very evident. A proposal by Devon and Cornwall Housing Association to develop the site was strongly opposed; a public meeting in August 2016 was attended by more than 100 people and more than 60 statements were submitted by local residents, of all ages, relating to its use as a playing field. Activities recorded included walking and dog walking, running, playing football, rugby training, children's play, family picnics and barbecues, special community events, meditation, tranquillity, bird and other wildlife watching, and many related to use of the field by themselves, their children and grandchildren from the early 1950s to present day. The importance of the field being easily accessible within the locality was emphasised. In response to the proposal Cornwall Council's Public Space Officer objected to the loss of the open space "in the strongest possible terms" and referred to the Open Space Strategy assessment for Penzance identifying that there was no surplus in strategic type 1 open space in the town. As already stated, that situation has not changed; neither has the importance of the playing field to the local community. The Save Alverton Playing Field group was formed and its successor organisation applied for the field's designation as a Village Green. While the application was refused the reason given was that the evidence referred to above showed that the playing field was already accessible "by right" for recreation. Action continues to ensure the field remains available, and properly managed, for recreation use by the surrounding community, including an objective for transfer of the field to a community group or Penzance Council.

In addition to its recreation importance the site is more than a grass field in biodiversity terms being almost surrounded by trees which connect with adjacent woodland (Priority Habitat Woodland -MAGIC) and which are within a Tree Preservation Order area. The residents' statements referred to above describe sightings of badgers and owls as well as other birds. The reasons for designation as a Local Green Space are not "anti development" but a reflection of the particular importance of the playing field to the local community.

- 8. Amenity Spaces** - Princess Royal Gardens (Alverton), site 26; Lansdowne Road (Alverton), site 27; Prospect Place, St Clare, sites 37 & 38; Pendarves Flats, St Clare, site 39; Jack Stephens estate (St Clare), sites 40 & 41; Coombe Lane/Coombe Road (Treneere), site 47; Treweath Road (Treneere), site 86; Parc Mellan (Treneere), site 49; Pendennis Road (Pendennis), site 70; Freshbrook Close (Eastern Green), sites 81 & 82;

The particular importance of the sites listed above relate to both their immediate locality and to the wider environment because of their proximity to main access routes or pedestrian routes. They provide areas for informal recreation, children's play and socialising as well as for community events. Recognition of their amenity value and contribution to the quality of the living environment is welcome; however, it is not agreed that CLP Policy 25 provides sufficient guidance or protection at the local level. Neither is it agreed that designation as Local Green Spaces would "stymie" redevelopment.

The purpose of designating these green spaces is to ensure that their importance in the local community is recognised, and would be given appropriate weight in considering any proposals for development, including a change of use to provide for parking.

- 9. Small Children's Play Spaces** Col Coombe (Treneere), site 48; Rosehill Meadow (Heamoor), site 62; Foxes Field (Eastern Green), site 88. It is recognised that these sites are small and have limited value as green spaces beyond play space. Policy DDH6 seeks to protect outdoor play areas from loss; it is proposed, therefore, that these three sites are deleted from the proposed LGS designations.