

## Appendix 78

## Penzance Neighbourhood Plan Regulation 14 Consultation – Cornwall Council Policy Team Comments.

Penzance NDP – Additional policy comments.

Thank you for taking our previous comments into account; I have only made comment against the policies where I have identified a concern.

General – the Climate Emergency DPD has now been found sound at examination and has been supported at Full Council – it will now move forward to imminent adoption. As the DPD policies are strategic, the Penzance NDP will need to be in general conformity with them. I have identified policies where there is duplication with the CEDPD policies and ask that you remove any policy text that duplicates the CEDPD requirements.

Policy	Text	Comments
DDH1		<p>Part 2, final paragraph; note that you can't require additional validation requirements for minor development so a planning statement setting out the response can be encouraged but not required. I think this is covered by 'should demonstrate' but just want to manage expectations.</p> <p>We think that design coding will be increasingly important and referencing a future Penzance design code will future proof the plan but making sure that it will have future weight – you could do that here or in policy H11.</p>
DDH4		<p>The CEDPD is has been approved for use and is now moving rapidly forward to adoption; policy SEC1 covers much of the content of this policy and we would ask you to review that policy and remove duplication here (for example, biodiversity NG, tree cover solar gain etc.). We cant require development to meet Passivhaus standards.</p>
DDH5	<p>ii) provide new safe pedestrian and cycling links within development sites <b>where possible</b>, while minimising the impact of light pollution;</p>	<p>Not sure that the light pollution is appropriate here?</p>
H7	<p><b>Policy H7: Meeting Affordable Housing Needs in Communities (Local Lettings)</b>  <b>1. The initial, and subsequent, occupation of new affordable housing units provided in</b></p>	<p>The comments in red are from the affordable housing team – unfortunately, they do not support your local lettings approach.</p>

	<p>the Plan area will be prioritised to ensure affordable housing is available to those in need in the community where the housing is provided.</p> <p>2. Eligible households, identified by the Cornwall Housing Register or approved local surveys, will be prioritised as follows: <b>local surveys do not assess and verify housing need. In addition they are position at a single point in time without a mechanism to review change of circumstances.</b></p> <p>i) firstly to those with a local connection to the relevant settlement (within the Penzance Parish) where the affordable housing is located; and <b>Defining, justifying and enforcing boundaries will be problematic. We experience this at a Parish level and can provide several example of where this will cause queries and challenges to allocations of homes.</b></p> <p>ii) secondly to those with a local connection to Penzance Parish;</p> <p>iii) before cascading to adjacent parishes or Cornwall as a whole.</p> <p>3. For the purposes of this policy and to enable local lettings to be made accordingly:</p> <p>i) “community area” is defined as the settlement (village or town) where the housing is located; and,</p> <p>ii) “local connection” is defined as: <b>this is in direct conflict with Council’s allocations scheme and cannot be supported.</b></p> <p>a) currently living (and have done for 5 or more years) in the community area; or,</p> <p>b) previously living (and have done for 5 or more years) in the community area; or,</p> <p>c) working for 16 hours or more per week within the community area; or,</p> <p>d) having immediate family (child(ren), sibling(s), parent(s) or grandparent(s)) who currently live in the community area (and have done for 5 or more years); or,</p> <p>e) providing or receiving care for immediate family (as defined in iv) in the community area.</p>	
H9	<p><b>1. Major</b> Development proposals which, as a whole or as the sum of phased parts of a site, provide 10 or more dwellings (major development) are essentially changing or</p>	<p>Move yellow text to supporting text.</p>

	<p>creating a new community. Developers will be required to create <b>should provide</b> a Community Integration Plan establishing how <b>new homes</b> will <del>that community will</del> function, how it will interact with adjacent existing communities, and how it respects their distinct identities as set out in policy DDH7. <b>It is important that the Community Integration Plan is developed with the engagement of those communities to secure intelligently designed, balanced communities which work to maintain the quality of the built and natural environment and social fabric, creating integrated, functional extended communities rather than piecemeal suburbs or dysfunctional urban sprawl.</b></p> <p><b>Move yellow text to supporting text of policy DDH7.</b></p>	<p>It would make more sense to explain what a community integration plan should include in Policy DDH7. This policy H9 could then be very short (or removed).</p> <p>See also suggested alternative policy text suggested in previous comments which could be used in policy DDH7: <i>Proposals for major development must demonstrate in their application how they have consulted with the local community over their development plans. Proposals must</i></p> <ul style="list-style-type: none"> <li>• <i>show how the development will enhance and connect to adjacent and neighbouring development; new developments should increase permeability and where possible, improve walkable access to local facilities.</i></li> <li>• <i>Show how the new development will contribute to and enhance the sense of place.</i></li> <li>• <i>Show how the development will deliver the right mix of homes for the local community</i></li> <li>• <i>Explain how the feedback from the local community has been reflected in the design</i></li> </ul>
H11	<p>ii) take fully into account this Plan's Design Principles set out in Appendix 5 of this Plan, <b>and any future Penzance Area Design Code</b></p>	<p>Suggest inclusion of a reference to a future PZ design code Para ix) is largely covered by policy SEC1 of the CEDPD and could be removed.</p>
GI1		<p>Ensure that there is justification for the inclusion of each of these proposed green spaces and that landowners have been identified and made aware of the proposed designation.</p>
GI4		<p>I think this is now covered in Policy G2 of the CEDPD and could be removed?</p>
GI7 and GI8		<p>I think this is now covered by Policy G3 of the CEDPD?</p>
NEW16		<p>This is quite permissive – do you want to qualify support for a boat house? <i>'where it is sensitively designed / maintains access to the coast etc?'</i></p>

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