

**Penzance Neighbourhood Plan Regulation 14 Consultation –  
Response to Cornwall Council Affordable Housing Team**

**Policy H7 (community/local lettings)**

1. Local connection - Penzance parish (the Plan area) comprises a number of individual villages and hamlets – primarily Mousehole, Paul, Newlyn, Heamoor and Gulval - as well as Penzance town. The importance of separate identity to the villages is recognised in the Cornwall Site Allocations DPD (CSADPD) and is a clear theme throughout the Neighbourhood Plan, in Community Vision statements, Objectives and policies, and follows from community consultation responses.
2. The opportunity of an affordable home in the village where people grow up, or have close family, or are employed is an important aspect of its separate identity, and is as relevant to villages within Penzance parish as it is to villages in adjacent parishes. The geographical spread of villages within the parish is also relevant with, for example, Gulval Churchtown at the eastern boundary being almost 5 miles from Mousehole on the western edge. The allocation of affordable housing without considering local connection to the relevant village results in households being separated from family support within their community, for help with child care, care for elderly relatives or others needing support. The allocation of affordable homes provided in villages on the basis of Penzance parish wide need, including the need in Penzance as a main town, also results in limited access to it by those with a local connection to that community.  
The Neighbourhood Plan, therefore, includes Key Objectives in its Housing section to ensure that affordable housing is available to people with a local connection to the settlement as well as the parish, and to support community led “exception sites” for affordable housing in or on the edge of villages, and on the edge of the town, that provide for the housing needs of the relevant community, initially and in the future.
3. Cornwall Local Plan, Policies 8 and 9, provide the strategic context for provision of affordable housing. Policy 8 refers to affordable housing being “provided and (where possible) retained for eligible local households”. Policy 9, Rural Exceptions Sites, refers to first and future occupation of the affordable homes being “to those with a housing need and local connection to the settlement or parish in line with the Council’s adopted local connection policies”. The supporting text recognises the importance of local housing needs being met in the settlement to which there is a local connection, including in hamlets where justified.
4. The Housing Supplementary Planning document (SPD) was adopted in February 2020. It provides additional guidance on how the policies in the Local Plan will be implemented. The SPD does not set new planning policy. It seeks to clarify that affordable led housing schemes will be acceptable in principle on the edge of main towns as well as in rural areas, and emphasises that “it is important that appropriate scale affordable housing led schemes, with high proportions of affordable housing, continue to be delivered in sustainable locations which include main towns”. The wording of the SPD, which refers to housing need being considered “at the parish level (if a site is in a parish) or town level (if a site is in a town” implies that need in a town will be considered separately from need in rural communities (a parish). However, the approach appears to assume that the whole of Penzance parish is the town, and takes no account of parishes where there are a number of individual villages as well as a (main) town. The result is that affordable housing schemes in or on the edge of villages are related to the needs of the parish as a whole including the need in the main town. The implications of this approach are
  - the level of parish wide need being used to support potential schemes in villages which are inappropriate, in scale, to the location;
  - people in need of affordable housing where they have a local connection being excluded by the level of need in the town;
  - people being allocated housing at a distance from their family support networks without a local connection to the community;
  - the “community led” aspect of rural exception proposals being eroded.

5. Local connection to the community, before the town and rest of the parish, is particularly important for affordable led schemes on rural exception sites; Policy 9 of the Local Plan clearly relates the approach to proposals in “smaller towns, villages and hamlets, whose primary purpose is to provide affordable housing to meet local needs .....and would be well related to the physical form of the settlement and appropriate in scale, character and appearance” and the SPD extends the approach to sites on the edge of main towns. Considering local need in the town is relevant to affordable led schemes on the edge of the main town; however, considering exception proposals in or on the edge of villages or hamlets in the context of the housing need in the main town is wholly inappropriate.
6. On planned sites, it is recognised that the physical constraints on Penzance have resulted in the allocation of significant sites in villages, primarily Heamoor and Gulval, to meet the overall housing requirement for the town; and, as part of that requirement, it is accepted that the affordable housing contribution from those sites should relate mainly to housing need in the main town. However, it is considered that those with a local connection to the relevant village should also be given some priority. Supplementary Briefing Notes for sites in Heamoor, Eastern Green and Newlyn (Policy H12 in the Neighbourhood Plan) seek priority for households with a local connection to the community before cascading to the parish as a whole.
7. Local surveys - Local Plan Policy H9 refers to local needs “as evidenced through the Cornwall Housing Register or any specific local surveys completed using an approved methodology.” The SPD states “Where necessary, supplementary evidence may include a specific local needs survey completed using an approved methodology.” defined in the Glossary as “a snapshot of the local housing situation at a specific point in time (which) supplements the data from the Homechoice Register”.  
Such a survey could be carried out for an individual village, or the town, for example by one or more polling district(s) and, where carried out in support of a specific scheme, circumstances are unlikely to change significantly during the relevant timescale.
8. Polling district boundaries are defined by community and, while it is recognised that drawing any line will often raise queries, it is not considered that using polling districts to define the range of settlements in Penzance parish (see below) is problematic.  
Mousehole INM5.  
Paul and Sheffield INM5.  
Newlyn INM1; INM2; and INM3 (including Tredavoe).  
Heamoor IPH1; IPH2.  
Gulval IPG.  
Penzance IPE1; IPE2; IPE3; IPP1; IPP2; and IPP3.  
and Eastern Green IPE4.
9. As set out above the availability of affordable housing to people with a local connection to the settlement (community area) where affordable housing is provided, and support for community led exception sites, are key housing objectives in the Neighbourhood Plan, directly related to the separate identity of villages within the Plan area. It is considered that the insistence that housing need is established and met only at a parish wide level, irrespective of the very different settlements within the parish or local connection to an individual settlement, is unnecessarily inflexible, and does not allow for community identity or local connection to be met or sustained. The comments on the Neighbourhood Plan policy approach do not appear to reflect the SPD statement that local connection criteria can easily be updated.  
It is proposed that the policy approach in the Neighbourhood Plan is retained, and requested that local connection criteria are updated to reflect the nature of the settlement pattern in Penzance parish (and other similar urban/rural mix parishes) to enable delivery of the policy.