

**CORNWALL SITE ALLOCATIONS DPD**

**POSITION STATEMENT**

**REPRESENTATION NO.131**

**MATTER 2**

**PENZANCE AND NEWLYN SPATIAL STRATEGY AND ALLOCATIONS**

**TUESDAY 20<sup>th</sup> AND WEDNESDAY 21<sup>st</sup> MARCH 2018**

**FEBRUARY 2018**



**PCL Planning Ltd** 1<sup>st</sup> Floor, 3 Silverdown Office Park, Fair Oak Close,  
Clyst Honiton, Exeter, Devon, EX5 2UX United Kingdom  
t: + 44 (0)1392 363812  
f: + 44 (0)1392 262805  
w: [www.pclplanning.co.uk](http://www.pclplanning.co.uk)

## POSITION STATEMENT

## MATTER 2

PENZANCE AND NEWLYN SPATIAL STRATEGY AND ALLOCATIONS

---

**1. Introduction**

- 1.1 This Position Statement is submitted on behalf of our client the Inox Group (representation number 131).
- 1.2 These comments should be read alongside our earlier representations to the Site Allocations Development Plan Document (Site Allocations DPD).

**2. General Issues*****j. Is the strategy for Penzance consistent with the LPSP?***

- 2.1 No. The strategy is not consistent with the LPSP because it does not allocate sufficient land to provide the highest level of certainty that the minimum housing apportionment for Penzance and Newlyn specified in Policy 2a of the LPSP will be achieved.
- 2.2 Out of the 2,150 dwellings required as a minimum there is an identified residual of 1,202 dwellings to be delivered by 2030 to ensure that the minimum requirement is met. However, the amount of housing that is potentially achievable through the site allocations is approximately 1,180 dwellings (with some potential for extra delivery from two of the mixed use sites). Whilst it is accepted that this level of provision is close to satisfying the minimum requirement it is an approximate figure that could end up lower and which is already below the minimum requirement set in the LPSP. This is inappropriate. The allocations made within the Site Allocations DPD should comfortably exceed the minimum figure so that there can be greater

---

certainty that the minimum housing requirement will be achieved over the plan period. It is a minimum after all.

- 2.3 Additionally, Penzance has a very high level of affordable housing need (1,308 applicants in housing need according to the housing register) therefore it is important that the level of housing brought forward through the allocations is maximised wherever possible.
- 2.4 There is further land available within my client's control (which relates to PZ-H8) that could be allocated to increase the estimated housing delivery and therefore help it reach a level that is comfortably and appropriately above the minimum requirement (please refer to previous representations submitted and comments made below in respect of proposed allocation PZ-H8).

### **3. Issues relating to individual sites**

***j. Does allocation PZ-H8 make effective provision for the preservation of the setting of Grade II\* Listed Trengwainton, in accordance with national policy?***

- 3.1 It is our view that the PZ-H8 allocation goes further than is necessary in terms of making effective provision for the protection of Trengwainton in line with national policy.
- 3.2 As set out in our previous submissions to the Site Allocations DPD, land has been removed from the proposed allocation which could have been included without having any impact on the setting of Trengwainton or any of the views from the property and its grounds (please refer to plan submitted as part of our response to the Pre-submission consultation representation). This land does not need to be excluded from the allocation because it is well contained from the wider landscape and there is a lack of inter-visibility between this land and Trengwainton (due to the presence of a large area of existing trees along the western boundary on my clients' site and other existing vegetation between the two). The inclusion of this land would

therefore have no greater impact on the setting of Trengwainton than the allocation as proposed would.

- 3.3 In respect of the proposed tree planting along the northern boundary of the site, it is our view that the specified requirement of “at least 35 metres” is excessive and unjustified. Precluding this amount of my client’s site from development would have an impact on the number of dwellings achievable and therefore viability. A thinner band of trees (of approximately 15 metres) along this boundary would be more appropriate and still achieve the purpose behind its inclusion as a requirement of the allocation.
- 3.4 Restricting vehicular access to one and for it to be via Roscadghill Road is not necessary to ensure the effective preservation of the setting of Trengwainton House and is unjustified. A second vehicular access (not just bus-only) should be allowed for on to Boscathnoe Lane because it is practical and logical for an allocation of this size to have two main vehicular access points. An unrestricted vehicular access point on to Boscathnoe Lane that has a 15 metre deep band of trees either side of it will not lead to an adverse impact on the setting of Trengwainton and this would have no greater impact than a bus-only access at this point.
- 3.5 The inclusion of the additional land referred to above and the imposition of a thinner band of trees as stated would enable the delivery of a higher level of housing across the allocation. This would help provide greater certainty that the minimum housing requirement for Penzance and Newlyn is achieved whilst still effectively preserving the setting of Trengwainton in line with national policy. Also making the changes to the allocation proposed by my client in this response (and the previous representations submitted) will mean that a policy compliant level of affordable housing provision can be delivered promptly to start addressing the high level of identified housing need.