



Representations to the Perranzabuloe Neighbourhood
Development Plan.

Supplementary consultation on proposed changes to the
Neighbourhood Development Plan
(19th January to 2nd March 2023)

Representations submitted on behalf of
Classic Builders (SW) Ltd

February 2023

Representation produced by:

Dan Mitchell MRTPI

Planning Director – Influence Planning

Mobile: 07802 283779

Further to our original comments submitted in relation to the Regulation 14 Consultation submitted on 16th June 2022. These additional comments respond to the latest Supplementary Consultation due to finish on 2nd March 2023. Those original comments still stand and are not withdrawn as a result of this further consultation exercise.

These comments are limited to the additional aspects covered by the Supplementary Consultation Exercise.

1 - Shrink the Principal Residence Policy to just Perranporth.

It is agreed that there is no evidence to support a Parish wide imposition of the PRP Policy in the Perranzabuloe NDP. I am still not convinced that there is sufficient evidence to justify the PRP Policy in Perranporth itself covering the area identified by a somewhat arbitrary 1km compass circle from the centre of Perranporth. The approach to mapping it this way slices through Perrancoombe - is there any evidence to show that there is more holiday occupancy/second homes at the northern end of Perrancoombe compared to the southern end?

Does Bolingey included in the restricted area have more second home ownership than Perrancoombe – is there evidence to justify imposing the restriction on Bolingey?

I have studied the submitted evidence for the PRP Condition in Perranporth set out in Table A2 of the Background Paper – *‘Paper A: Proposed Changes to the Principal Residence Policy Boundary’*. I would suggest that the evidence is exaggerating the percentage of Holiday lets and second homes.

It is noted that the two sites at ‘The Dunes’ development adjacent to the beach (formerly the Ponsmere Hotel) which gained planning permission under reference: PA16/03380 for the *‘Demolition of the existing Ponsmere Hotel, erection of 28 residential apartments, 11 houses, 2 flats over garages, restaurant (A3 use class) and car parking and associated infrastructure (decision APP/D0840/W/15/3005920) with variation of condition 2 for substitution of plans to amend design and elevations’*.

The proposal replaced a unviable hotel in a prominent coastal position – the LPA were relatively content to a mix of holiday units (given it was a holiday site) and residential use. This isn’t an accurate example of a typical residential development in Perranporth. The alleged 80% holiday let usage reflects the fact the apartments were marketed for holiday use given it replaced a hotel.

On a similar basis ‘The Waves’ at Wheal Leisure was the site of a 20 bed hotel and it’s replacement with holiday letting units (PA18/06396) effectively continued the historic holiday use on the site. It is not a true comparison of the holiday occupancy on a standard residential

site. Both of the sites with high holiday usage have replaced historic hotels that have always been in a holiday/tourism use.

The Taylor Wimpey development at Parc Hendrawna is a more accurate reflection of typical holiday let/second home usage in Perranporth. This comes in at 5-10% according to the NDP evidence. The inclusion of the two former hotel sites and the bespoke one-off dwellings at Ramoth Way or Liskey Hill skew the percentage of holiday lets to a false figure.

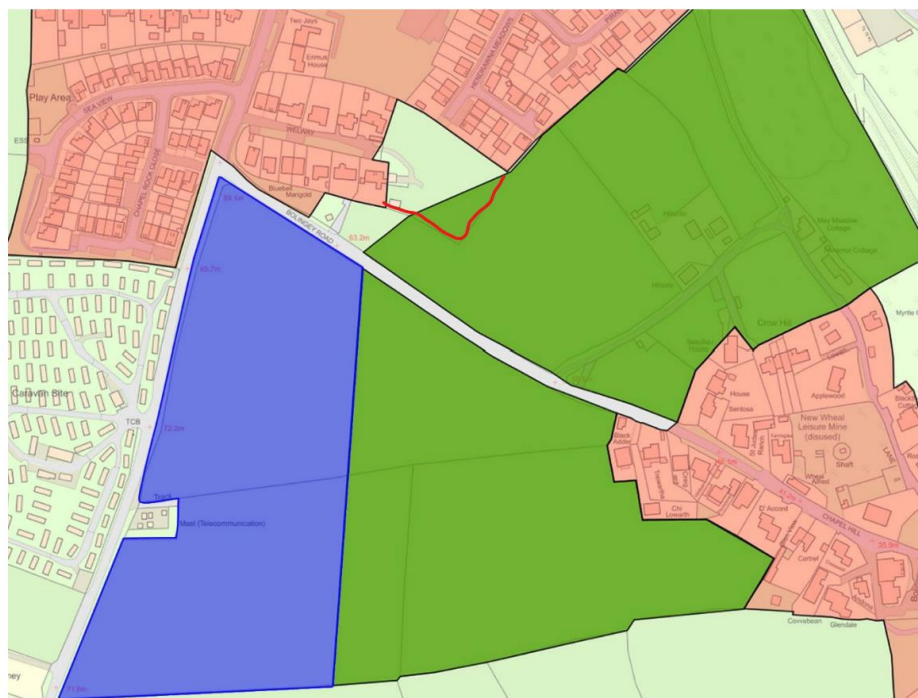
It is accepted that the volume of holiday lets/second homes receives lots of negative media coverage in Cornwall, and if an existing resident is asked do you want to stop anymore units being provided they are likely to say no. However, there needs to be reasonable evidence to justify such an intervention in the housing market and I do not believe that such evidence exists to justify the policy in Perranporth.

In addition to the lack of evidence to support such a policy – there is no mention of the consequences for imposing such a restriction for Community Infrastructure Levy revenues. The Cornwall Council CIL Charging Schedule 2018 (see **DM1**) – shows Perranzabuloe Parish in Charging Zone 4. Section 3.2 (Page 6) of the Charging Schedule confirms:

‘Where an adopted (made) Neighbourhood Development Plan contains or introduces a Primary Residence Policy, development in the related Parishes will be charged at the CIL rate in the next lower charging zone, in order to reflect the uncertainty of the market impact of the Policy’.

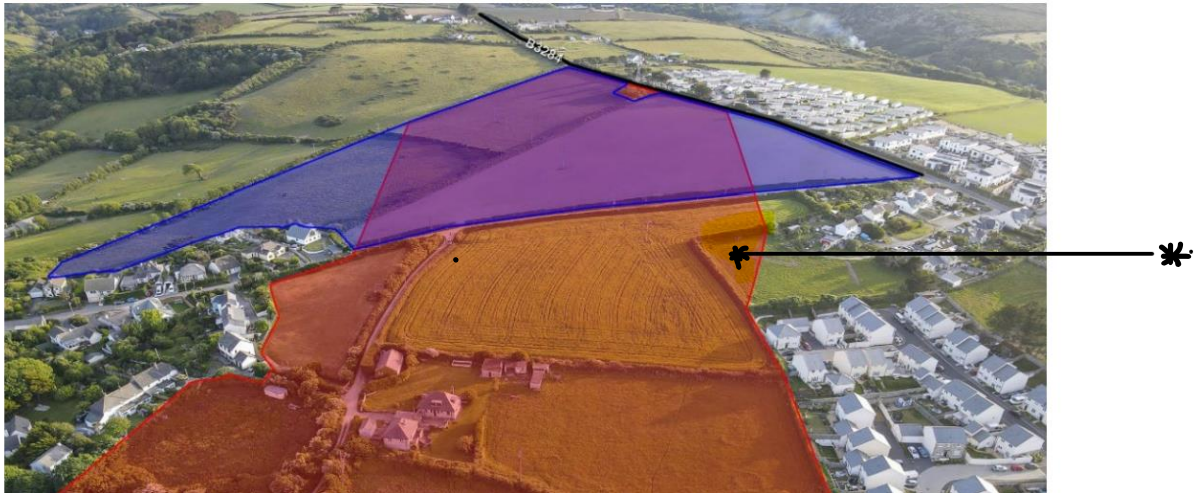
This means development in Perranporth would not receive any CIL revenue as it would drop down into the Zone 5 Charging Zone. There does not appear to have been any assessment of the implications of this in the NDP evidence base or in the Sustainability Appraisal to this NDP. This is a key factor in delivering community infrastructure and should not be overlooked just to try and tackle what is considered to be an inflated piece of evidence that exaggerates the existing second home situation in Perranporth.

We raised the obvious conflict with the proposed secondary school site in our Regulation 14 representations of June 2022. Therefore, we welcome the omission of the area which is to be utilised for the education use from the proposed settlement gap and green buffer.



There seems no reasonable justification why the slice of the green buffer runs through the land, any reasonable assessment would take it round the edge of the field boundaries. It should not run through the paddock on an arbitrary basis, this makes no sense.

Figure B2: Proposed School Area and Regulation 14 Plan Settlement Gap and Green Buffer Area



Area to be removed has been shown by black line.
