

9 June 2022

Dear Perranzabuloe Parish Neighbourhood Plan Steering Group

Response to the Reg14 Consultation

Representation on behalf of Perranporth Golf Club

I am instructed by Perranporth Golf Club (PGC) to submit these representations on the draft Perran Plan (Reg 14) which is currently out for consultation – April 22nd to June 17th 2022.

Introduction

The PGC is owner of a substantial land and property holding in the parish, and a part of the community which provides recreation and leisure opportunities for parish residents, residents from outside the parish and tourists. The PGC own and manage holiday accommodation within the centre of the site which provides a vital income stream for the club. Sadly the golf industry has struggled in recent years and whilst Cornwall has boomed post-covid in terms of visitors, the accommodation on site is limited and the offer is being surpassed by other venues and resorts in the county. Therefore the club are continually looking at ways they can increase their revenue and selling parcels of their land along Ramoth Way for residential development has been a strategy which in recent years has had a mixed outcome but has helped to keep the club financially viable.

These representations are drafted in a constructive way to support the aims and ambitions of PGC but also to support the continued progress of the Perran Plan, for which my clients and I would like to congratulate the steering group members and everybody else involved on a draft Plan which has clearly come about through a massive amount of hard work and dedication.

Scope of Response

The scope of this response is to look at policies which affect PGC's role as a landowner, employer and local business. In this section we will list the policies which we will be making reference to. In the next section we will provide a more detailed response to each policy indicating whether we support, object, or suggest minor modifications. The final section will highlight our objections and outline what modifications we feel are needed, with justification and proposals.

The policies we will be making comment on are:

The Vision

SD1: Settlement Boundaries

SD2: Sustainable Design of Development and the Quality and Distinctiveness of the Built Environment

H02: Design of Dwellings

H05: Housing for Specific Needs

NE1: Areas of Ecological, Landscape, Biodiversity and Geodiversity Value

LW2: New Sports Facilities

BER2: Quality Employment Premises

BER4: New Technology and Hi-tech industries

BER6: Live/Work

BER7: Small Scale Business Initiatives

BER8: Business Opportunity Areas

TO2: New Built Tourist and Visitor Accommodation (Bed and Breakfast, Hotels, Guest Houses and Purpose-built Holiday Lets and Lodges)

Policy Review

Policy Reference	Position	Comments
The Vision	SUPPORT	We support the Vision, Aims and Objectives of the Perran Plan
SD1: Settlement Boundaries	OBJECT	We support a policy on settlement boundaries but we do not support the current wording of SD1 or the current defined boundary for Perranporth.
SD2: Sustainable Design of Development and the Quality and Distinctiveness of the Built Environment	MINOR MODIFICATION	There is so much guidance on Design in planning nowadays that there is a risk development proposals/applicants may not know which policies to refer to. We think we understand the intention of SD2

		<p>but it references the Cornwall Design Guide 2016 (now superseded) at point iii). and the Perranzabuloe Design Code at point xiii). Part 3 to SD2 then references Policy H02: Design of Dwellings.</p> <p>Our suggestion is to require the <i>Design and Access Statement</i> submitted with planning applications, to set out which design policies/guides/codes have been considered, and what consultation has been carried out including a hierarchy/structure of relevant guidance so that it is clear and transparent what has been considered and what hasn't.</p>
H02: Design of Dwellings	MINOR MODIFICATION	We support policy H02 but suggest the role of the Design and Access Statement could be referenced alongside the Masterplan and Planning Statement.
H05: Housing for Specific Needs	MINOR MODIFICATION	We support the aims and objectives of H05 but suggest the 500metre on level ground requirement is relaxed owing to the topography of the Parish and Perranporth in particular. Proposals should be judged on their merits.
NE1: Areas of Ecological, Landscape, Biodiversity and Geodiversity Value	MINOR MODIFICATION	<p>We suggest the wording of this policy is altered to be less restrictive. The onus should be on development proposals to sustain and enhance the natural environment. There are often adverse impacts on the natural environment from development but an adverse impact should not trigger response of "will not support". Typically adverse impacts are judged in terms of the severity of that impact and then the harm is weighed in the planning</p>

		balance. NE1 reads like it is a 'drop dead' policy, i.e. if there is any adverse impact then the application should be refused but we do not believe that is the intention.
LW2: New Sports Facilities	MINOR MODIFICATION	<p>Community groups, clubs and sports organisations are facing difficult challenges to keep going at present, in particular swimming pools and leisure centres are currently having to make difficult decisions to either close or increase fees. To set up a new facility including capital costs and ongoing running costs is even more difficult.</p> <p>We therefore suggest there is additional wording in the policy to reference that enabling development, supported by an economic viability appraisal, will very likely be required to support the delivery of new facilities or expansion of existing.</p>
BER2: Quality Employment Premises	SUPPORT	Delivering a year-round and sustainable economy requires positively worded policies like BER2 to give confidence to landowners and investors to bring proposals forward which can help support the Vision for Perranzabuloe parish.
BER4: New Technology and Hi-tech industries	SUPPORT	We support this policy and how hi-tech industries can play their part in the Vision for a year-round and sustainable economy.
BER6: Live/Work	SUPPORT	As stated in footnote 126 the NPPF requires planning policies to enable a rapid response to changes in economic circumstances. More opportunities for Living and Working at home should be encouraged and BER6 does this.



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Chartered Town Planner

BER7: Small Scale Business Initiatives – only 1 of the 6 employment areas is within a settlement boundary, so object to the need for these new start up initiatives to be in a settlement boundary.	MINOR MODIFICATION	We support the objectives of BER7 but suggest the locational criteria are amended to reflect Policy 5 of the Cornwall Local Plan. Opportunities for small scale business needs do not always need to be located within existing employment areas, within settlement boundaries or within redundant buildings. Other previously developed “brownfield” land opportunities exist or greenfield opportunities where the criteria within CLP5 are satisfied and we suggest BER7 is more closely aligned to the Cornwall Local Plan approach.
BER8: Business Opportunity Areas – do we make a case for being added to this area? Need to promote the benefits of this location	MINOR MODIFICATION	Existing employment sites are not the only suitable locations for additional business opportunity areas. Furthermore only 1 of the 6 existing employment areas designated within the plan are inside a settlement boundary, ergo the plan supports new employment development outside of settlements in 5 out of 6 locations. We suggest the policy wording is modified to allow for new business development on sites that comply with Cornwall Local Plan Policy 5.
T02: New Built Tourist and Visitor Accommodation (Bed and Breakfast, Hotels, Guest Houses and Purpose-built Holiday Lets and Lodges) – full support to this one	SUPPORT	New tourist and visitor accommodation can help existing businesses to sustain and enhance their operations, attracting more investment into the parish and increasing employment rates which can support a year-round economy.

Objection - SD1: Settlement Boundaries

The main objection of my client to the draft Perran Plan is the treatment of PGC land located off Ramoth Way. The evidence base of the plan accepts that the dwellings off Ramoth Way, specifically those recent additions, are 'part of the settlement'¹. Functionally, physically and visually they are part of Perranporth. We don't believe there can be any doubt about this. To suggest that dwellings on one side of a road are within the settlement and dwellings on the opposite side of that same road are not within the settlement is counter-intuitive.

The land fronting Ramoth Way on the north side (golf course side) will always have development potential under rounding off and infill policies. These plots of land are not within open countryside and are in sustainable locations with good access to an excellent range of services and amenities within the town. They are immediately adjacent to existing housing. Permissions for small scale developments on Ramoth Way have been granted in recent years and the developments have not always been well received locally. There is an opportunity with this Plan to extend the settlement boundary around the houses north of Ramoth Way as well as some additional land to be developed for infill and rounding off plots thus 'completing' the settlement boundary in this location and preventing future opportunities for incremental growth.

This approach would be supported by *CLP3: Role and function of place* and the *Chief Planning Officer Advice Note: Infill/Rounding Off*. Not doing so leaves an opportunity for future applications to be granted during times where Local Plan and Neighbourhood Plan policies are not considered to be up to date or 'in force', for example when the Local Planning Authority cannot demonstrate a 5 year supply of housing land. That time may be not be too far away considering the County has been delivering fewer homes year on year for the last four years, housing demand is increasing and it is expected the impact of Covid will significantly impact both housing supply and demand.

Our proposed settlement boundary at Appendix 1 below would provide the PGC with some certainty of planning prospects that would allow them to invest in planning applications for new homes which would have to comply with the emerging Perran Plan policies. The proposed boundary changes would also deliver a 'completion' to the settlement in this location and better define the edge of settlement to 'round it off'.

We hope our representations are found to be constructive and we would be delighted to meet with members of the steering group to discuss this representation further with the aim to reach an agreement and remove our objection.

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Chartered Town Planner

¹ <https://www.perranplan.co.uk/wp-content/uploads/2021/10/Deciding-Settlement-Boundaries-for-Perranzabuloe-2021-06-08.pdf>

Appendix 1: Proposed Settlement Boundary Modification

