

Background Paper - Housing completions in the last decade in the context of the Local Plan, and the significance of Affordable Housing

Part 1 Have housing developments in Perranzabuloe fulfilled the overall housing requirement in the Cornwall Local Plan for the period 2010-2030?

The NPPF makes it clear that NDPs “should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies” (NPPF 2018, para 13). They “should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies” (para 29).

The Cornwall Local Plan (CLP) *minimum target* for housing provision over the twenty-year plan period is for 52,500 dwellings for the county, with 1100 in the St Agnes and Perranporth Community Network Area (CNA). Of this total, how much should Perranzabuloe contribute? Apportioning this 1100 figure across the constituent parishes in relation to the number of houses in each parish - the approach recommended by CC - gives a figure of 352 dwellings (houses and flats) for Perranzabuloe over the entire twenty-year plan period from 2010 to 2030.

What has happened in the parish since 2010? Table1 summarises the situation in Perranzabuloe as of April 2021. The total ‘on stream’ as it were comprises 550 dwellings already built in this period plus another 29 under-construction and 265 ‘commitments’ through the giving of planning permissions..(The more standard Cornwall Council table used to present data on the ‘Minimum Housing Requirement’ for a parish can be found in the Appendix to this paper.)

Table 1 Comparison of Cornwall Local Plan requirement for housing in Perranzabuloe with projected completions, based on CC monitoring data to end of April 2021

Cornwall Local Plan requirement		Progress from 2010 to April 2021	
CNA Housing requirement (from Table 1 of Cornwall Local Plan)	1100	Completions	550
% CNA population in Perranzabuloe	32%	Sites under-construction	29
Housing requirement 2010-2030 for Perranzabuloe	352	Sites with planning permission but not-started (295), minus 10% to allow for county-wide rate of non-completions	265
		Total projected completions, without allowance for windfall sites, during the rest of the CLP period – the sum of above	841

Evidently, the total of dwellings built and in the pipeline is already running at more than twice the target requirement in the Cornwall Local Plan, a target that aims at the year 2030. Therefore, there

is zero CNA housing requirement¹ and consequently policy 3.3² does not apply within Perranzabuloe. Thus the NDP is not required to allocate further sites to be in conformity with the CLP.

Within the parish there is great concern – as evidenced by the main NDP survey and feedback at meetings - that the recent high rate of development in the parish is not sustainable, particularly given that it far exceeds the CNA-level allocation in the CLP.

The importance of restraining housing growth in this and adjoining parishes was recognised in the preparation of the Cornwall Local Plan. For example, the Inspector’s comments following his examination of the plan in May 2015 led to Cornwall Council increasing the county-wide allocation from 47,500 to 52,500 in the final version of the plan. However the housing requirement for the St Agnes and Perranporth CNA was kept the same at 1100 – in the light of concern that more housing on the coast would increase commuting to work in Truro and other inland towns, and so be undesirable in terms of sustainability. There is an argument that the ongoing high rate of housing development in Perranzabuloe and adjacent north-coast parishes is contrary to the strategic objectives of the CLP to concentrate housing growth in large towns.³

Part 2 Housing data from Cornwall Council, June 2021 - housing permissions given and completions by year since 2010, by site size and tenure (affordable or open market)

The figures on the following pages present data provided by Cornwall Council planning department. You can see there that:

- 1 The parish has had relatively high rates of housebuilding, especially from 2015 – 2020. These have mainly been on large sites of >10 dwellings. (The majority of these large sites in both Perranporth and Goonhavern emerged out of County Council-led studies to find housing sites, in the context of low rates of delivery prior to 2010. The studies involved extensive public consultation.) These sites (such as Parc Hendrawna in Perranporth and Marshfield Close, Parkdale and Gwel an Noon in Goonhavern) were largely completed between 2015 and 2020, and since then the rate of housebuilding in the parish has declined. (Figure 1)
- 2 Figure 2 shows the number of open market versus affordable housing (AH) completions per year. The number of AH completions broadly increased in line with the total number of completions but fell to zero in 2020/21. (Often developers have to complete the AH

¹ Provision in the parish is even higher than suggested in the table. The 787 figure excludes likely windfall sites of <10 dwellings for future years to the end of the plan period. This number is estimated as 22 per year for the entire CNA, which at 32% for the parish suggests 7 per year, or 70 over the remaining ten years to 2030.

² Policy 3.3 of the CLP reads: “3. Other than at the main towns identified in this Policy, housing and employment growth will be delivered for the remainder of **the Community Network Area housing requirement** through: identification of sites where required through NDPs”, rounding off..., infill sites.... and rural exception sites under Policy 9.” Emphasis added. Since the CNA housing requirement is zero in the parish (as it does in adjacent parishes), logically this policy carries no ‘material’ weight when planning applications for housing are determined in the parish.

³ See, for example, paragraph 1.39: Policy 2 (Strategic scale growth will be accommodated in our main towns and city where....): and Policy 3 (New development up to 2030 will be accommodated in accordance with the following hierarchy....[beginning with Truro city and the major towns], when this is read in conjunction with Table 1 on p.20-22 of the 2016 Cornwall Local Plan.

dwellings before completing the open market dwellings, and this probably explains the pattern.) Total provision of AH over this period was 184 dwellings.

- 3 In Figure 3, showing the number of houses *permitted* each year, by tenure, suggests how few houses have been permitted, with no approvals in the last three for AH. (May 2021 data from the Affordable Housing team points out that outstanding permissions for AH – those not yet built – then totalled around 20 dwellings and these were judged likely to be completed in 2021/22. Further possible sites for around 35 Affordable dwellings were under discussion in May 2021, sites that may receive planning permission, such as ‘Land off Marshfield Road’ in Goonhavern.)

Figure 1

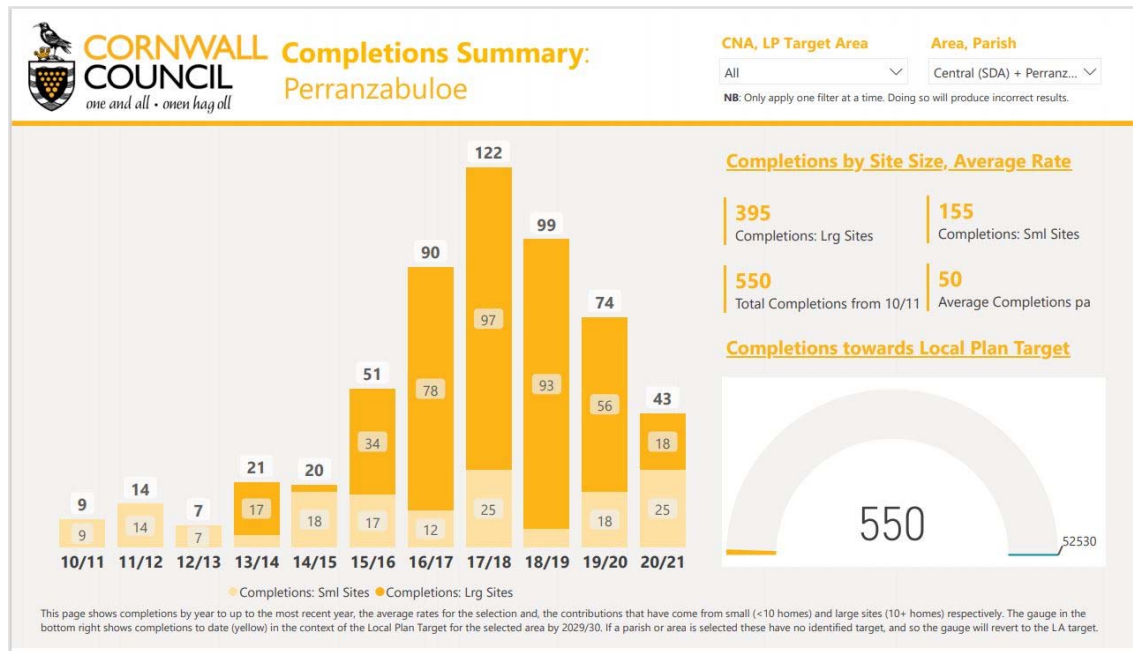


Figure 2

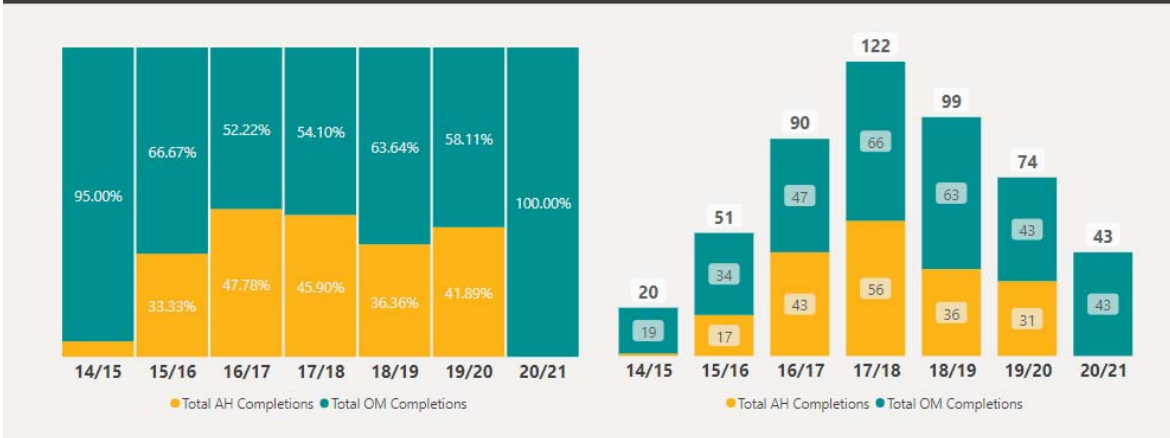
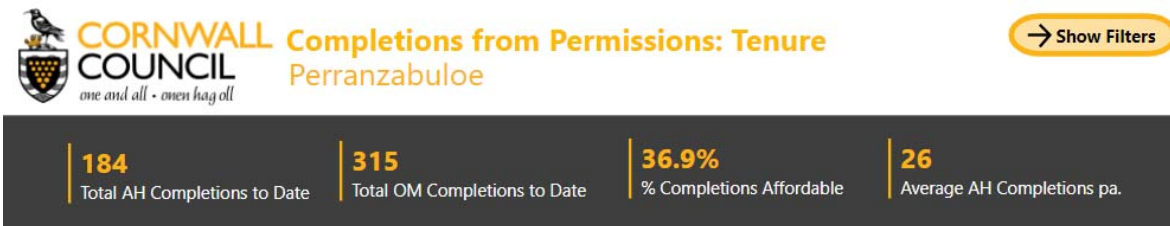
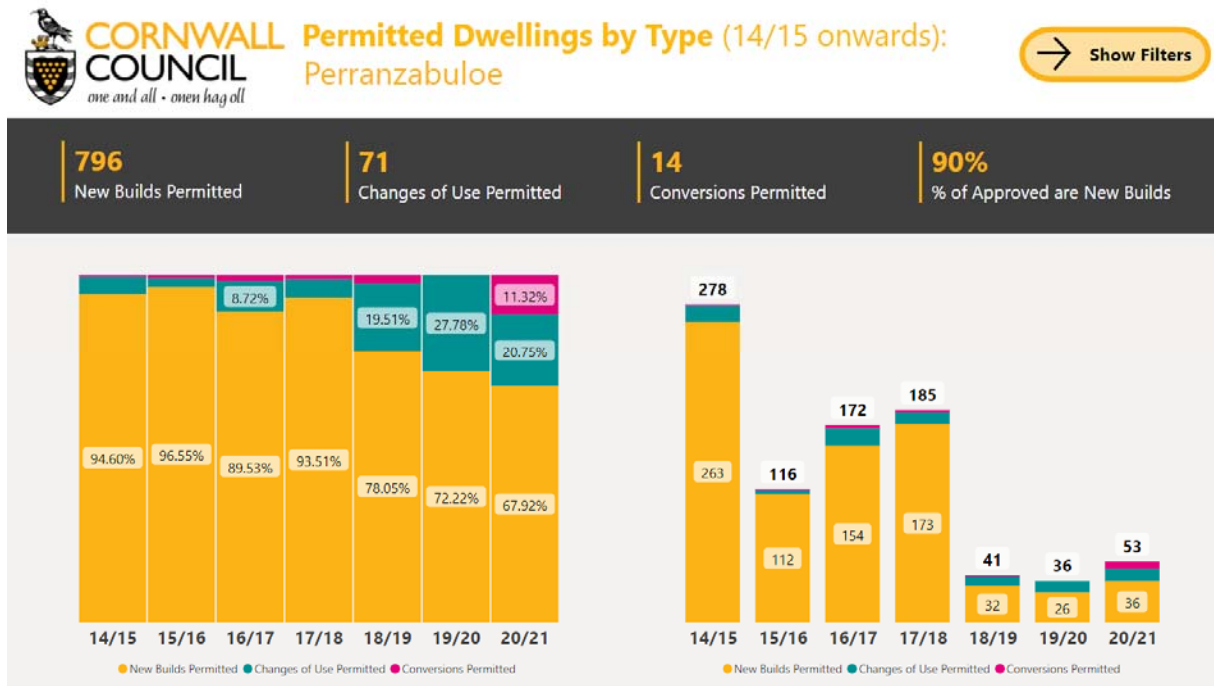


Figure 3



Part 3 Affordable Housing and Local Housing Need

Case study: in February 2020, an Inspector allowed an appeal by a developer against the refusal of an application for residential development of up to 30 dwellings on ‘Land East Of Wesley Road, Cubert’ (PA18/08384) on a ‘Rural Exception Site’. A central reason for allowing the appeal was the issue of local housing need. This was assessed through several means including the HomeChoice Register (HCR) whereby a total of about 35 households were considered to be in ‘affordable housing need’. During the appeal hearing, there was detailed examination of whether the sites in the parish with planning permission would indeed come forward. The Inspector concluded that the number that would come forward was only 6, leaving an unmet need of 25 - and so allowed the appeal.⁴

This vignette gives a flavour of the importance of local housing need to decisions as to whether large housing applications on the edge of Perranporth and Goonhavern on land that is regarded as open countryside are likely to receive planning permission. The existence of significant LHN that will not with any degree of certainty be catered for in the immediate future will carry significant weight in favour of approval of such an application, if not at the committee stage, then on appeal.

⁴ The document makes interesting reading for anyone interested in this issue. It is available in the ‘Background Papers’ folder, for ease of access.

The policy context is primarily Policy 8 (Affordable Housing) and Policy 9 (Rural Exception Sites) of the Cornwall Local Plan,⁵ supplemented by paragraphs 2.56 and 2.57 of the text. Paragraph 2.56 reads:

2.56 We recognise that communities need new housing to meet their local housing needs. This need occurs in all our communities including our smaller towns, villages and hamlets. In many of these communities, due to a lack of brownfield land or sites within the settlement, housing can only be delivered of an appropriate scale on sites outside the existing built up area. This reflects the way in which settlement patterns have evolved traditionally. **The provision of local needs housing on the edge of our smaller towns, and villages remains one of the key ways to deliver rural affordable housing.** (Emphasis added)

So, how large is the local housing need in Perranzabuloe?

Table 2 shows the change in the number of households on the HomeChoice Register (HCR) over the last four years, compared with the quantity of Affordable Homes completed over that time period. (Data provided by the Affordable Housing Team in Cornwall Council. The HCR data relate to specific times when the number on the HCR was worked out and recorded. Intervening data are not available, we understand.)

Table 2 Change in number of households on HomeChoice Register over time with local connection to Perranzabuloe, compared with AH completions in the parish

Year	May 2017	July 2018	April 2019	March 2020	May 2021
Number of households on the HCR in a specific month	210	175	131	111	172
	2017/18	2018/19	2019/20	2020/21	2021/22
Number of AH built in the April/March year	56	36	31	43	21 (proj)

At the time of writing, the most recent figures are for September 2021 when the number in Perranzabuloe was 192.

Evidently the number of households on the HCR is high, compared with both the number on the HCR in neighbouring parishes and compared with the projected number of Affordable homes likely to be developed in the near future.

⁵ *Policy 8 Affordable Housing* - all new housing schemes >10 units must provide, in viability zone 4 such as Perranzabuloe, 30% of number of dwellings on the site as AH. *Policy 9 - Rural exception sites*. Sites in the countryside where permission would not normally be granted will be approved only where primary purpose is provision of AH. A minimum of 50% must be AH. No size criterion so would apply to any size of development.

Over the three years from May 2017 to March 2020, the number on the HCR fell by 100 households (fifty percent) following the supply of 123 Affordable Homes. Since then – coincident with the Covid pandemic restrictions – the number has climbed back virtually to the level seen in May 2017.

One Cornwall Council officer suggested that a drop in the numbers between 2018 and 2019 possibly reflects the ‘cleansing’ started undertaken from January 2019. Households who had not bid within the previous 12 months were removed from the register. (Some households may not have bid because no properties had become available that interested them, and so may have subsequently re-joined the register.) Other households removed during this process might have found alternative accommodation and not themselves removed their entry from the HCR.

Further understanding of Affordable Housing and the HomeChoice Register

The issues of AH and the HCR involve many complexities such as:

- the difference between AH and social housing (‘Council housing’ for some):
- how affordable is AH, how much does it cost:
- who is eligible to join the register:
- what is a ‘local connection’:
- the different levels of need, as shown by banding of need into Bands A – E (Frequently over 50% of those on the HCR fall within the lowest band, E.).
- the ‘cascading’ used when not all of the AH built are taken by households on the HCR with a connection to Perranzabuloe, and are offered to households with a local connection to adjacent parishes.

Good sources of information are Cornwall Council’s 2020 Housing Supplementary Planning Document (SPD)⁶ and the Council’s AH web pages.

Acknowledgements

Thanks to Polly Oliver and Nicky Mannell of Cornwall Council for supply of data and assistance in interpreting those data.

⁶ <https://www.cornwall.gov.uk/media/qjyhrypo/final-housing-spd-feb-2020.pdf>

Appendix NDP Housing Requirement – approach drawn from Cornwall Council Guidance Note

Cornwall's Local Plan - Strategic Policies (Local Plan) 2016 apportioned 1100 dwellings to be delivered in the six parishes that make up the rural area of St Agnes and Perranporth Community Network Area (CNA). Figures supplied by Cornwall Council are presented in Table 1, and show no new dwellings need to be delivered between 2020 and 2030, to be considered in general conformity with the Local Plan.

Note the data in the table relate to 2017, around the time work began on this NDP. They show the situation then as it formed the basis for early decision-making within the Steering Group.

Table 1: Minimum NDP housing target to be in conformity with Cornwall's Local Plan

	(a) Local Plan Housing Target (April 2010-April 2030)	(b) CNA Commitments (-10%**)(April 2017)	(c) CNA Completions (April 2010 – April 2017)	(d) Local Plan Target (April 2017-April 2030) (a- (b+c))
St. Agnes & Perranporth CNA (Rural)	1100	563	660	0
	(e) Adjusted Pro Rata- rate*	f) Parish Commitments (-10%**)(April 2017)	(g) Parish Completions (April 2010 – April 2017)	(h) Parish's share of the remaining Local Plan Target ((e÷100)xd)
Perranzabuloe Parish	32%	313	212	0

*Where this is the pro-rata proportion of houses in the CNA, derived from the 2011 Census; and where this is adjusted to take into account the AONB (i.e. areas deemed inappropriate for large scale development)

**The reduction in 10% is to allow for the county-average of proportion of planning permissions that are not actually built out

Comment from the ND team: this approach first deals with the CNA-level data and only then turns to consider the parish data. This has embedded within it the assumption that any shortfall at a CNA level after any particular period of time should be addressed by all parishes within the CNA, irrespective of the permissions and completions in specific parishes before that date. This does not seem reasonable.

Further, for members of communities within any given parish, the question uppermost in their minds - judging by comments and responses picked up in the preparation of this NDP – is how many houses have been built and committed in this parish over this period, compared with what the CLP requires it to provide. The above approach obscures this dimension and for this reason, a parish-focussed one is adopted in the main text above.