



Perranzabuloe Neighbourhood Development Plan
Regulation 14 (pre-submission) Supplementary Public Consultation
January 2023

Paper A: Proposed Changes to the Principal Residence Policy Boundary

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Summary of Proposed Changes

We are proposing a change to the boundary of and area to which Principal Residence Policy (PRP) applies. The Regulation 14 Neighbourhood Plan proposed that the policy covers the entire Parish. However, recent experience elsewhere in Cornwall raises a major problem with this approach. If we continue with a Parish-wide stance, the entire policy is very likely to be deleted from the Plan at its Public Examination (where an independent planning Examiner scrutinises the Plan), as outside of Perranporth, only a low proportion of new housing is being bought for use as second homes and holiday lets (SH/HLS), and this reduces / dilutes the figure for the Parish as a whole to below a level considered reasonable for introducing a PRP. We propose, therefore, to change the policy in our Plan to apply to Perranporth only, which we are reasonably confident has good evidence to justify its boundary and will therefore 'pass muster'.

The changes proposed and being consulted on now have been triggered by responses to the Regulation 14 consultation, but only represent those changes which we consider require additional supplementary consultation in advance of submission of the Plan for Examination. Our detailed responses to comments received from the Regulation 14 consultation, and to those received from this supplementary consultation will be published after the supplementary consultation process has finished.

Introduction

Regulation 14 Neighbourhood Plan Context

The Regulation 14 Neighbourhood Plan (Neighbourhood Development Plan or NDP) defined the Principal Residence Policy for the whole Parish in policy HO1: Principal Residence Policy. The policy wording is reproduced from the Plan in Appendix 1 to this paper for ease of reference.

Reasons for Considering Changes to the Regulation 14 Neighbourhood Plan Proposals

In the early stages of Plan-preparation, it was always known that the proportion of second homes and holiday lets (SH/HLS) in the Goonhavern area and across the rest of the Parish is lower than in Perranporth, both in terms of the % of total houses and % of newly-built housing. However, through our survey and public meetings, it was clear that the community was very keen for a 'Second Homes' policy to cover the entire Parish.

However, experience in the summer of 2022 elsewhere in Cornwall - brought to our attention in no uncertain terms by staff at Cornwall Council - raises a major problem with this policy. The Parish-wide rate of SH/HLS is too low to justify the adoption of a PRP which applies to the whole Parish. If we continue with a Parish-wide stance, the entire policy is very likely to be deleted from our Neighbourhood Plan by the official Examiner – the official appointed to check our plan before it can be approved. The case of Breague parish, containing Praa Sands on the south coast, provided a powerful lesson in this regard.¹

¹ Breague has a coastal village, Praa Sands and a large rural hinterland; the Examiner initially rejected a parish-wide PRP and was only just-persuaded to accept later submissions arguing for a coast-only version. We understand that such flexibility is unlikely to be repeated. Details are available at PA21/00011/NDP, via the County Council Planning Search web site; particularly 'RESPONSE_TO_EXAMINER_QUESTIONS_OF_16_SEPT_21-6006948',

On the other hand, if we focus in on Perranporth, the incidence of SH/HLs in this coastal area is much higher than for the entire parish and so a proposal for this area is much more likely to be successful.

A reasonable question is: are there any implications for the rest of the parish if a Perran-only policy is adopted? Some have raised concern about the deflection of demand for SH/HLs further inland, into the rural part of the Parish and into Goonhavern. We have not seen any evidence for an impact of this kind. Most likely, purchasers will turn toward existing, older properties within Perranporth and the surrounding countryside – a PRP only controls the usage of new build properties. Or focus their attention on coastal areas in other parts of Cornwall without a PRP.

It is striking that Goonhavern supports a disproportionately large number of sites for camping, caravan and park homes, when compared with Perranporth. (These are not classed as permanent dwellings and building new sites would not fall within the auspices of a PRP.) To this extent, it caters for a different market from the village of Perranporth itself, and on this basis one would anticipate that any impacts of a Perranporth-only PRP would be limited.

This paper and the background paper (available at www.perranplan.co.uk/documents/) presents the best background data available for the whole parish and specifically for Perranporth to inform the consideration of the change to the PRP area.

Proposed Amendments to Regulation 14 Pre-submission Plan

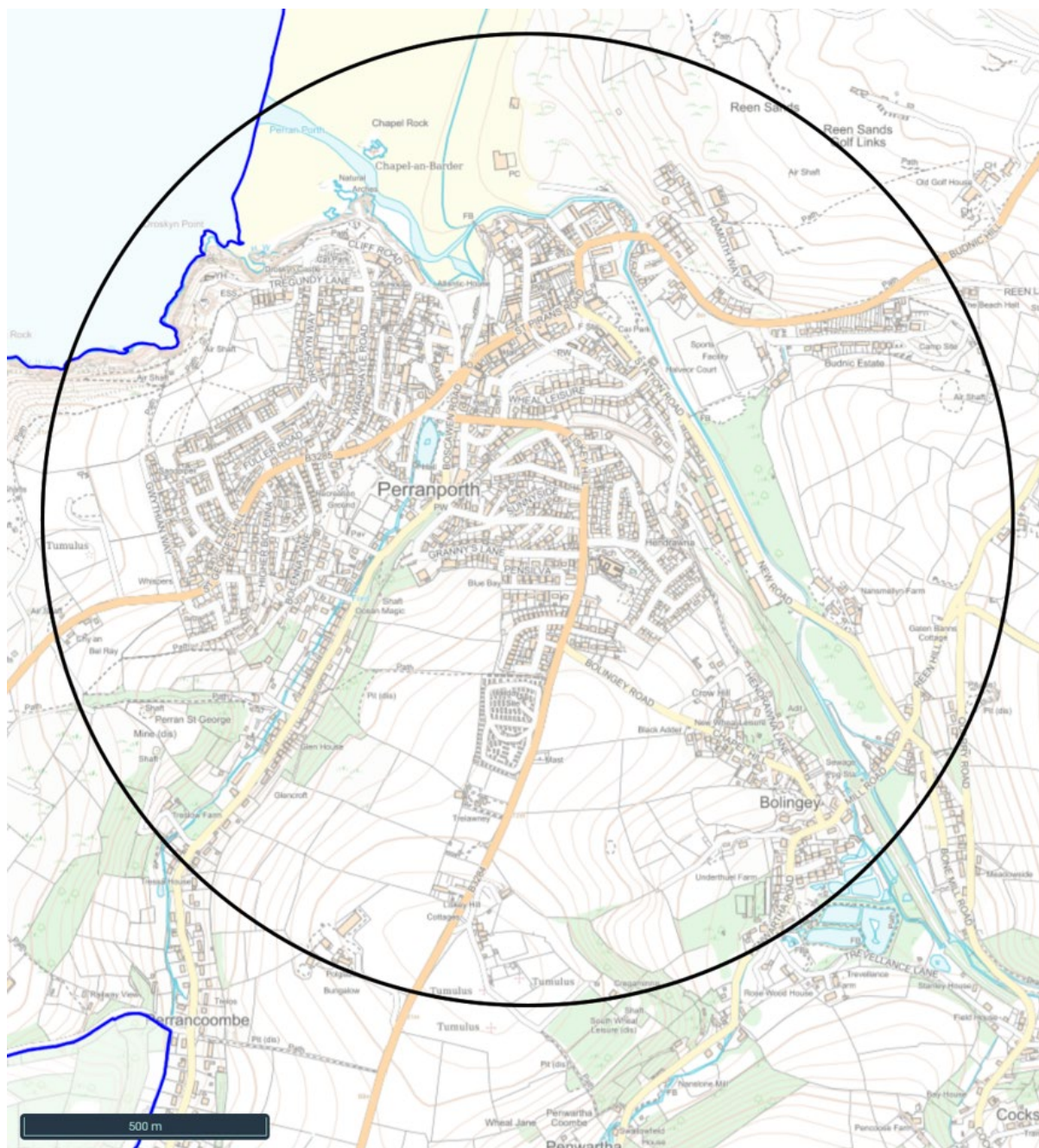
Proposed Changes to the Principal Residence Policy

The wording of Policy HO1: Principal Residence Policy is proposed to be amended to include reference to the map and to state that the policy only applies to this new reduced area of Perranporth, rather than whole Parish area.

The proposed change to the boundary / area to which the PRP policy applies is presented on Map A1 below. The proposed area to which the PRP policy would apply has been drawn to create a simple geometrical shape of a 1km radius circle, for ease of interpretation. This covers the entire village of Perranporth plus land immediately surrounding it, where new housing developments within the next 10 years (to the end of the plan period) are likely to be sited. The centre of the circle is located to include Bolingey from where people can easily walk to the beach, a major attraction for visitors to the village.

'BREAGE_PARISH_POLICY_H7_EVIDENCE-6290890' (7 April 2022). The Examiner's report is available via: <https://www.cornwall.gov.uk/media/je4c5vxi/final-examiners-report-jul22-accessible.pdf>

Map A1: Proposed New Area to which the PRP policy (HO1) applies



Rationale and Justification for Proposed Changes to the Principal Residence Policy

In this section, we set out the data we have gathered to help explain and underpin the proposed changes to the PRP area.

2011 Census data

The most recent official information and widely accepted source of data on this subject, the 2011 Census, is now outdated but remains the best available.² The graphic below shows the

² 2021 Census data are not likely to be made available by the Office for National Statistics at the Parish-level until summer 2023, at the earliest.

percentage of total household spaces (such as houses and flats) that were unoccupied at the time of the Census in April 2011. This is generally adopted as a measure of SH/HL s³.

From the table below, giving the comparison with four other parishes that have adopted a PRP, it is evident that the accepted indicator for SH/HLs in this parish is relatively low compared with that in Crantock, St Ives and Fowey. The case of St Agnes is special in that the Examiner initially rejected a PRP for the entire parish, and we were given the opportunity to argue for one covering only the coastal part of the parish. Two points: on this basis, with Perranzabuloe only slightly higher than the level in St Agnes, one would expect that the Perranzabuloe case would also be rejected. Secondly, we understand that procedures have changed since the St Agnes NDP was approved in 2019, and we shouldn't expect a 'second bite of the cherry'.

Table A1: Percentage of total household spaces (such as houses and flats) that were unoccupied at the time of the Census in April 2011

	% unoccupied households		% unoccupied households
St Agnes	13.2	St Ives	24.7
Perranzabuloe	14.1	Fowey	28.7
Crantock	21.3	Cornwall average	11.2

Disaggregated data for Perranzabuloe in 2011 is shown in the following drawing, showing the situation recorded across the parish by the 2011 Census per 'Output Area', the smallest area unit used in the Census reports.⁴ The colours used indicate the level of 'unoccupied households' and the drawing is annotated with percentage figures to make it easier to interpret.

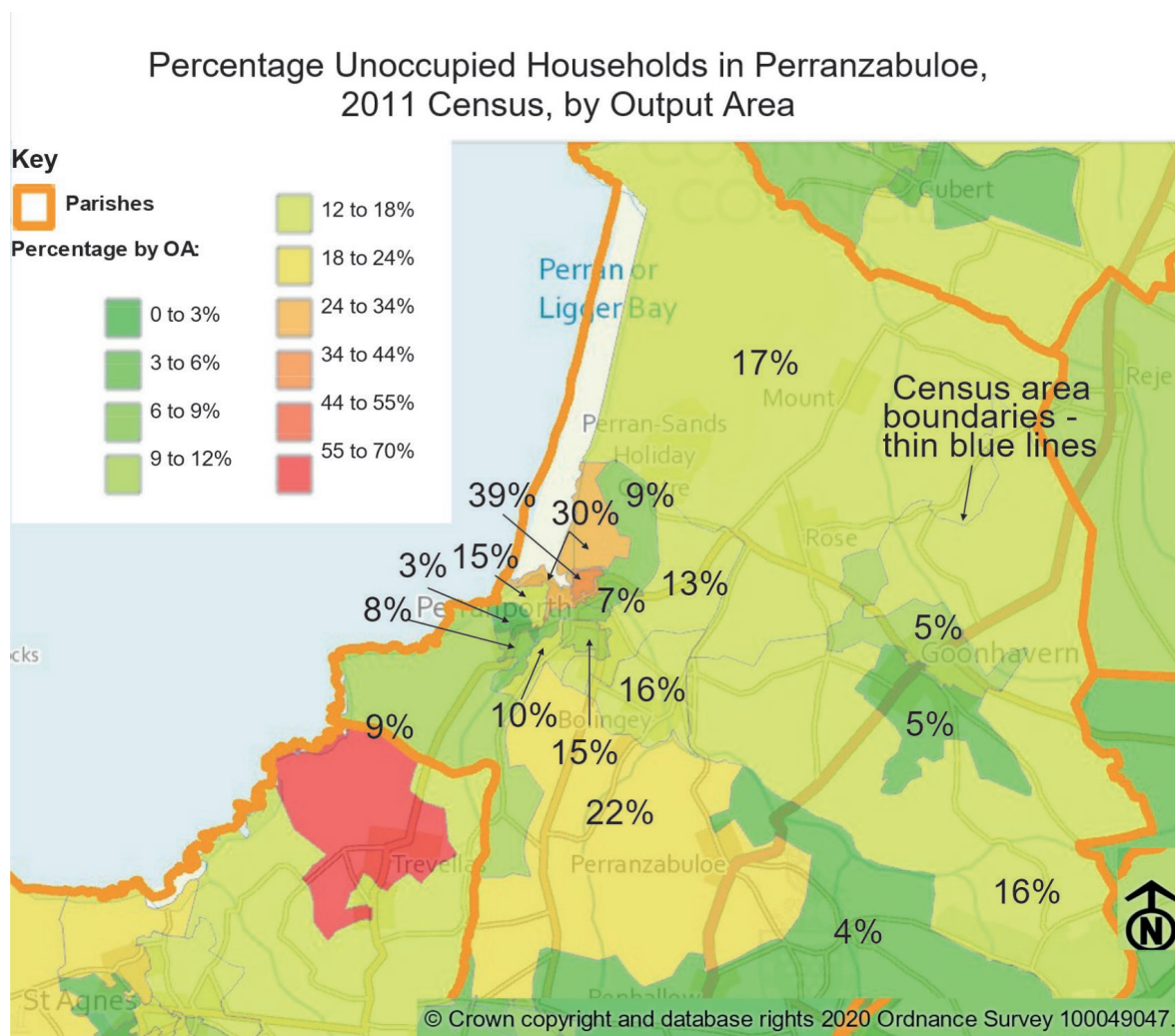
The levels in Goonhavern village are low compared with much higher percentages in certain areas of Perranporth. These two main villages are the main focus in this discussion since it is here that the majority of new houses will be built during the next 10 years or so to 2030, the end of the plan period. In rural parts of the Parish, relatively high levels *are* found- up to 22% - where demand is elevated for traditional cottages in the countryside. But in these areas, any PRP would have very limited impact given the low level of development there. In parts of Perranporth, the low 3% and 8% figures probably reflect the preponderance of Council and ex-Council housing, the nature of which is less likely to attract SH/HL buyers.

A reasonable question is: what figure for the percentage of existing housing stock being used for SH/HLs would justify or merit the introduction of a PRP? No clear guidance has been given to us, but from those NDPs containing a PRP listed above, the minimum figure probably lies in the 25-30% range.

³ Some of the properties may be in the process of being sold and re-occupied, or being re-furnished but this is assumed to be at a low level and relatively constant across areas.

⁴ For an idea of their scale, each Output Area in Perranzabuloe covered around 150 households, with a range of 127-178.

Map A2: Percentage Unoccupied Households in Perranzabuloe (2011 Census) by Output Area



Research into the loss of new-build housing to SH/HLs

We have attempted to find more recent and more accurate data than provided by the 2011 Census. This is presented in our “Background Paper – Principal Residence Policy” available to see via our website⁵ and we present summary data here. We chose to focus on the use of newly-built houses and flats for SH/HLs, from 2014 onward (after which Cornwall Council’s data on planning permissions and construction became most reliable). And did so for various reasons:

1. Surveying the incidence of SH/HLs in existing housing stock is a poor method of predicting the likely magnitude of SH/HL occupation of new housing that will be built in the future. PRP will apply only to new dwellings. New housing will be permitted and built in specific locations across the village, often in a style of architecture and in a location that will attract potential buyers OF SH/HLs to a different degree than do the houses in some or many parts of Perranporth. In brief: surveying recent new builds will give a better indication of the future.
2. It is easier to survey a specific sample of new build than the entirety of the housing stock.

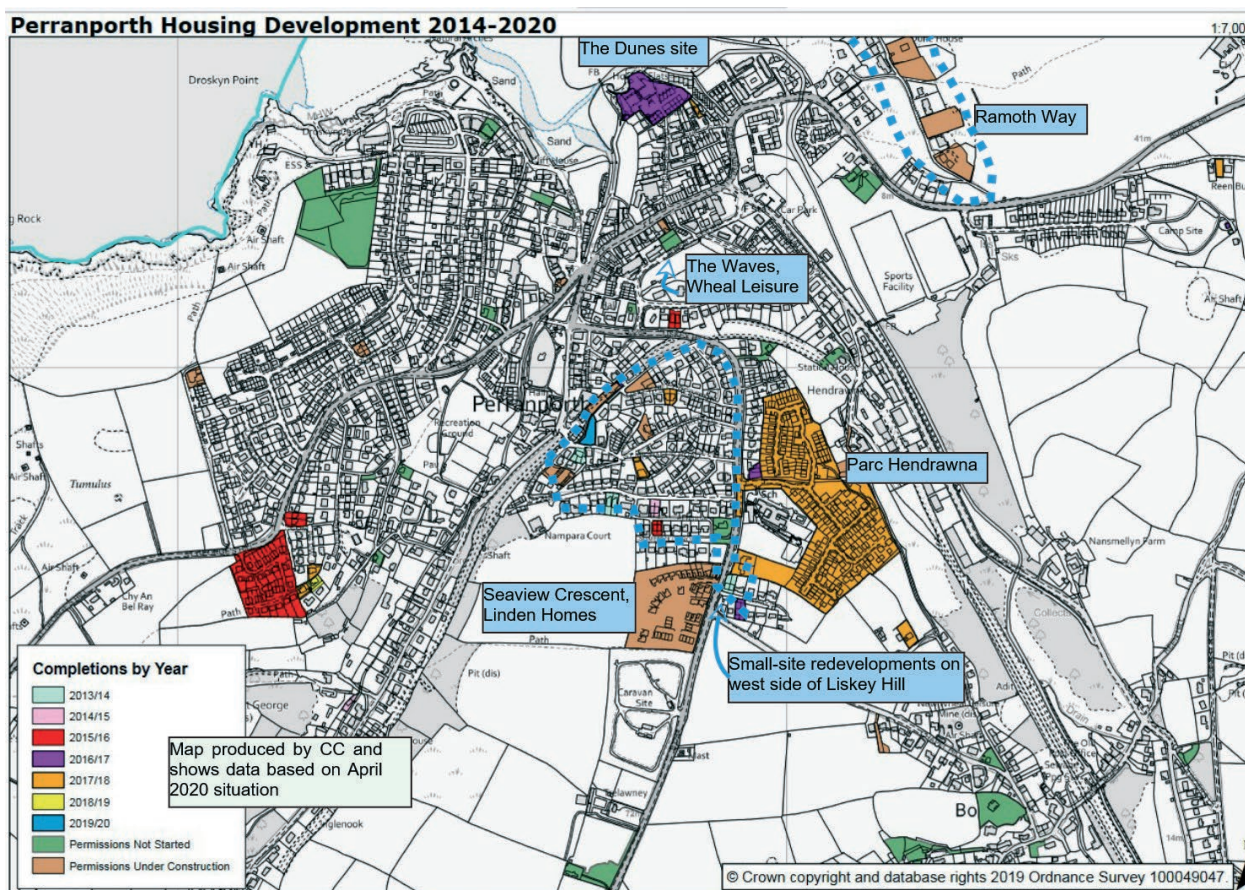
⁵ See <https://www.perranplan.co.uk/documents/>

Early survey information indicated clearly that the incidence of SH/HLs in Goonhavern was/is much lower than in Perranporth. Walking surveys in June 2020, during early relaxations in Covid restrictions, combined with online searches for holiday lets (in autumn 2022) gave strong indications that the incidence of SH/HLs in Goonhavern was indeed lower than in Perranporth. So, we have rigorously assessed the situation in Perranporth itself.

Survey areas were chosen to cover three types of housing development in Perranporth, to ensure that we covered the diversity of new housing development that has been occurring. The map shows the location of the six sites/areas:

- I. New large housing estates – 1) The Linden Homes development up Liskey Hill, Sea View Crescent; and 2) Parc Hendrawna, behind the school up Liskey Hill
- II. Small-scale housing developments – 3) the area off Liskey Hill to the west, single house plots have been redeveloped, usually with 2 houses; and 4) around Ramoth Way, extensive replacement and infill dwellings
- III. Redevelopment of hotels – 5) The Dunes development, replacing the Ponsmere Hotel; and 6) The Waves development on Wheal Leisure, that replaced the Perranporth Hotel.

Map A3: Perranporth Housing Development 2014-2020



The area of small-site redevelopments off Liskey Hill (area 3)) was chosen specifically because this kind of activity is more prevalent here than in other parts of Perranporth, as evident from a visual inspection of the above map.

In all three categories, it is reasonable to expect that these kinds of development will be repeated in the future -if not on that immediate site then in similar form nearby. For example, there are several large, hotel-like buildings in Perranporth than might be replaced

in the future, and off Liskey Hill, the process of demolish/replace of older houses by two dwellings is unlikely to have been exhausted.⁶

We used a number of methods to assess which properties were being used as a permanent residence or a SH/HL. These included: drawing on local knowledge, talking to people met in the neighbourhood, and knocking on doors and asking residents: walking around and assessing the use from the appearance (such as children’s toys in the window, and the presence of stickers on wheelie bins, indicating that a private company is being paid to collect waste): examining online advertising for HLs (including checking whether the entire property is let and is offered for more than three months of the year): and examining the Open Electoral Register for registration of electors at a specific property (not infallible, but this provides supportive information).

Some parishes have surveyed by checking for lights on in evenings during winter, months when many SH/HLs are unoccupied. We haven’t generally relied on this approach, mainly because 3 or 4 time-consuming repeat visits would be required to be confident of the interpretation. However, for large buildings visible ‘in one sweep’, such as The Dunes main buildings, we have adopted this technique. The advantage of this approach is that picks up second homes not used for holiday letting. Focussing on online advertising misses such properties completely.

The results for these six sites/areas are shown in the table, and further information on this assessment is provided in our “Background Paper – Principal Residence Policy” available to see via our website⁷.

Table A2: Site Analysis of Second Homes / Holiday Lets

	Site/area	Number on site**	Number SH/HL	Percentage SH/HL estimated
1	Sea View Crescent, Linden Homes development, top of Liskey Hill	36**	9	25%
2	Parc Hendrawna, behind the school	60**	3-6	5-10%
3	Small-scale 1-for-2 replacement on the west side of Liskey Hill, down to the railway line	26	12	46%
4	Ramoth Way, replacement and infill	7	4	57%
5	The Dunes development, adjacent to the beach	37**	30	80%
6	The Waves, Wheal Leisure	5	4	80%
	Total/average	171	62-65	36%-38%

** - excluding Affordable Housing. AH is only required on housing sites of six or more units.

⁶ In the interests of completeness, it may be useful to remind readers than when a single house is demolished and planning permission is gained for two houses, a PRP requirement will only apply to one of the two replacements.

⁷ See <https://www.perranplan.co.uk/documents/>

This evidence, based on a considerable amount of work we have done, provides an up-to-date picture to supplement the now-dated Census data.

What is the significance of these numbers? The percentage of new housing stock lost to local and potential residents through its use for SH/HL is much higher than the average level across the existing housing stock, as revealed by the 2011 Census. In the context of several hundreds of households on the HomeChoice Register, this number of dwellings removed from the available stock can only be significant, especially when multiplied up beyond this sample of sites across the village and other developments there.

But it not just a matter of numbers. The housing market in Perranporth is being pushed and manipulated toward the upper end of the price range by demand for SH/HLs, through the design, pricing and sometimes the marketing of new builds. It is a widely-held view that the existence of a buoyant market for SH/HLs pushes up prices and exacerbates the difficulty of people buying houses to live and work in the locality.

Properties are in a price bracket that very few if any of the people working in the area are able to afford and this applies even to those on higher incomes (£50,000 to £100,000+ pa). Hospital consultants and other senior staff are increasingly accepting jobs at the nearby Truro NHS hospital (Treliske) and then turning down those jobs later when they discover that they cannot find housing for themselves and their families. (Perranporth is within the required travel time for on-duty staff to be at home if a shift allows, an issue particularly important for staff with young families.) This kind of experience is not unique to the health sector - it is repeated across many sectors for people wanting to live and work in Perranporth.

This is the harm caused by the demand for SH/HLs in Perranporth.

Options and Comments

We would like to know whether or not you agree with this change to the PRP area, i.e. to cover the Perranporth area instead of the whole Parish, and if you have any comments on the changes and information presented in this paper. You can do this by either following this link (<https://www.perranplan.co.uk/>) and indicating your preferences in relation to this and the other two consultation papers, or printing the comments form available on the website and returning it to the Parish Council at the following postal or email address:

Neighbourhood Development Plan Supplementary Consultation, Perranzabuloe Parish Council, Chyanhale, Ponsmere Valley, Perranporth, Cornwall, TR6 ODB; or,

Email: comments@perranplan.co.uk

Paper copies of this paper and comments form can be requested from the Parish Council at the above addresses or you can phone on 01872 572727.

Paper copies are also available at the Perranporth Post Office.

The consultation period for this and the other two papers runs between 19th January and 2nd March 2023.

What's Next?

When the consultation period has ended we will consider the comments, confirm the final changes to the Plan as a result of the initial Regulation 14 consultation and this supplementary consultation, publish the schedule of comments and our responses to them and submit our Plan to Cornwall Council. Cornwall Council will then run one further consultation and appoint an Examiner to preside over an independent Examination of the Plan. Should the Examiner recommend that the Plan moves forwards from that stage, it will be the subject of a local referendum to decide if the Plan should be formally used in the planning system to help determine planning applications.

Appendix 1: Extract from Regulation 14 Neighbourhood Plan (Policy HO1: Principal Residence Policy)

Policy HO1: Principal Residence Policy

- 1. Open market housing, excluding replacement dwellings, will only be supported where there is a restriction to ensure its occupancy as a Principal Residence. Principal Residences are defined as those occupied as the residents' sole or main residence, where the residents spend the majority of their time when not working away from home. New unrestricted second homes and holiday lets will not be supported under any circumstances.**
- 2. Sufficient guarantee must be provided of such occupancy restriction through the imposition of a planning condition or legal agreement.**
- 3. The condition or obligation on new open market homes will require that they are occupied only as the primary (principal) residence of those persons entitled to occupy them.**
- 4. All occupiers of homes with a Principal Residence condition will be required to keep proof that they are meeting the obligation or condition and be obliged to provide this proof if/when Cornwall Council requests this information. Proof of Principal Residence is via verifiable evidence which could include, for example (but not limited to) all residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc.).**