

Housing completions: in the context of the Local Plan, and the significance of Affordable Housing

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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 2023. The data clearly show that the number of dwellings built is already 80% more than the minimum target for the parish to the year 2030, with another seven years to run. (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 2023

| Cornwall Local Plan requirement | | Progress from 2010 to April 2023 | No units |
|---|------------|--|------------------|
| CNA Housing requirement (from Table 1 of Cornwall Local Plan) | 1100 | Completions | 633 |
| % CNA population in Perranzabuloe | 32% | Sites under-construction | 25 |
| Housing requirement 2010-2030 for Perranzabuloe | 352 | Sites with planning permission but not-started (172), minus 10% to allow for county-wide rate of non-completions | 155 ¹ |
| | | Total projected completions during the rest of the CLP period, without allowance for forthcoming small-scale ‘windfall sites’ and ‘Rural Exception’ sites that emerge after April 2023 | 813 |

¹ This figure excludes the 132 for Penhale Camp as, at the time to writing in May 2023, CC considered the planning permission to have lapsed.

Therefore, there is zero CNA housing requirement² and consequently policy 3.3³ 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.⁴

Part 2 Housing data from Cornwall Council, to April 2023 - 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:

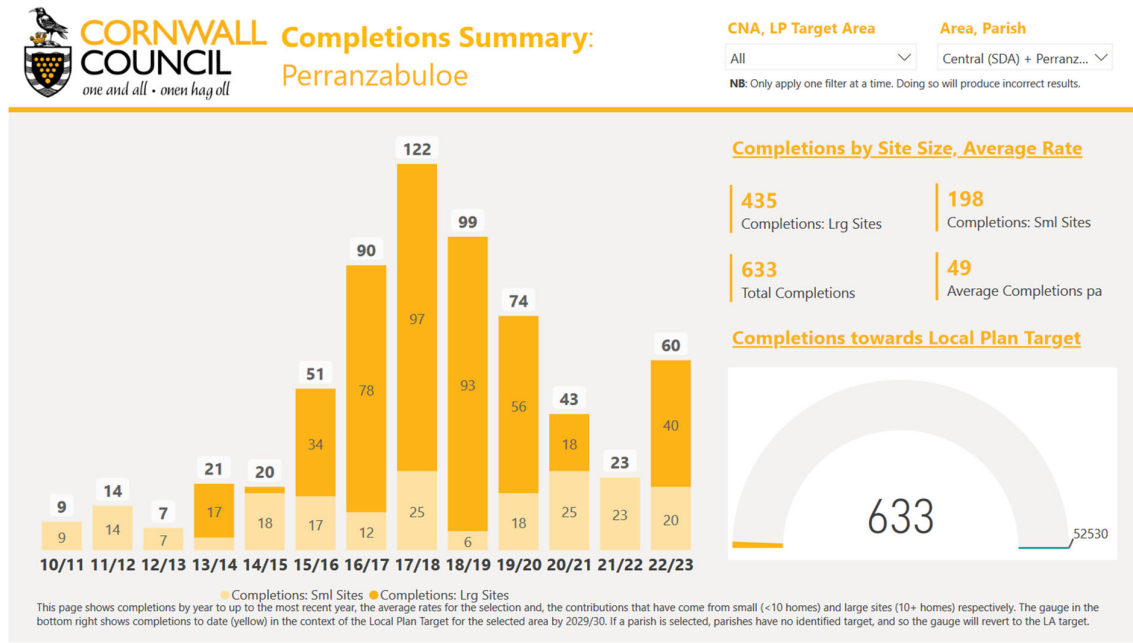
- 1 The parish has had relatively high rates of housebuilding, especially from 2015 – 2020. These have mainly been on large sites of >10 dwellings. (The majority of these large sites in both Perranporth and Goonhavern emerged out of County Council-led studies to find housing sites, in the context of 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 subsequently the rate of housebuilding in the parish has declined. (Figure 1) Completions in the year to April 2023 included those on Penrose Farm, Penrose Holiday Park in Goonhavern and at Droskyn Way, Perranporth.

² Provision in the parish is even higher than suggested in the table. The 843 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.

³ 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.

⁴ 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.

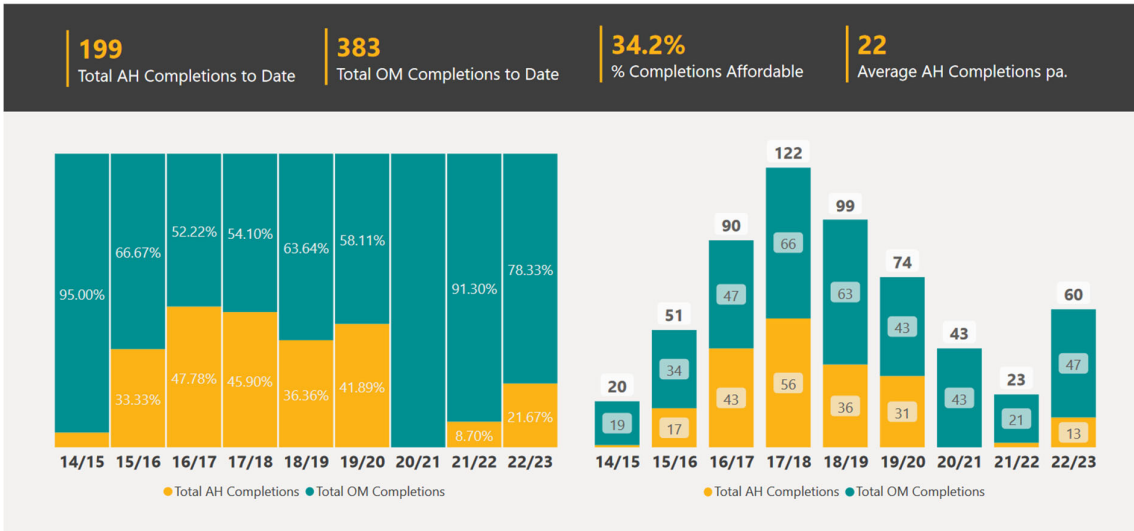
Figure 1 – Completions by site size



2 Figure 2 shows the number of open-market versus affordable housing (AH) completions per year, from April 2014.⁵ The number of AH completions broadly increased in line with the total number of completions but fell to zero in 2020/21, before increasing again. (Often developers have to complete the AH dwellings before completing the open market dwellings, and this explains some of the pattern; also the Parc Hendrawna development included an unusually high proportion, 50%, of AH.) Total provision of AH over this period was 199 dwellings.

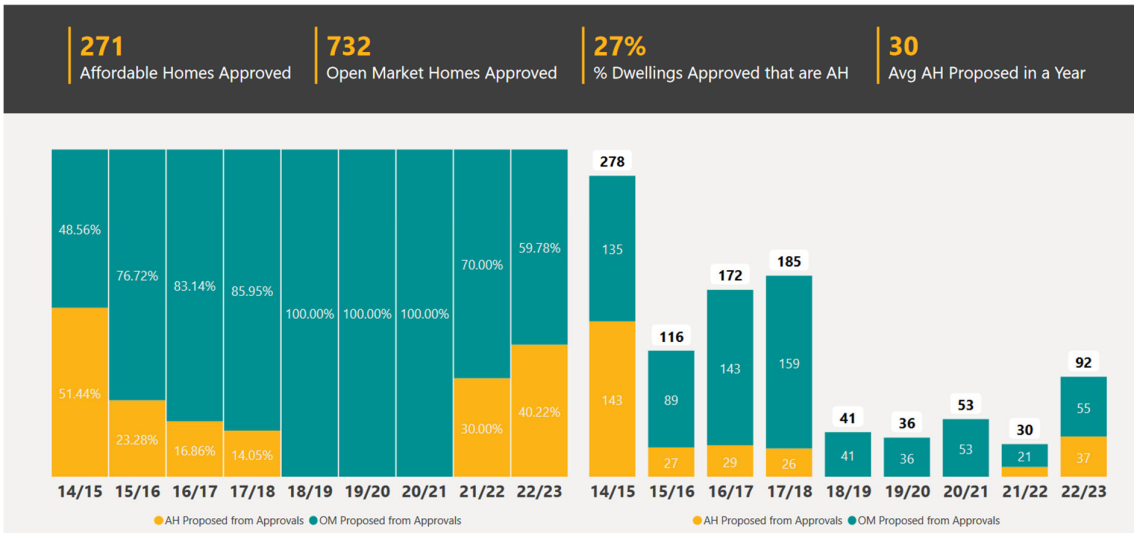
Figure 2 – Completions of open-market versus affordable homes

⁵ Data on tenure breakdown were not recorded in the same manner before 2014 as after that year. For this reason, the total completions in Figure 2 – the sum of the two categories - are fewer than in Figure 1. The heading ‘Completions from Permissions’ refers to completions from planning permissions issued after the beginning of the Local Plan period in 2010.



3 Figure 3 shows the number of houses *permitted* each year by tenure (green for open market and orange for Affordable Housing). The recent upsurge in AH numbers in the last two years, with 38% of approvals being affordable, brings to an end the unusually low historic rate in 2018-21. (One of the recent approvals is for a 100% affordable housing association development in Goonhavern. The high percentage in 2014/15 reflects the 50% AH on the Parc Hendrawna estate in Perranporth.)

Figure 3 – Permissions by tenure



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.¹

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.

The policy context is primarily Policy 8 (Affordable Housing) and Policy 9 (Rural Exception Sites) of the Cornwall Local Plan,⁶ 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

⁶ *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.

| 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 | 0 | 2 |

More recent figures for the number of households on the HCR in the parish are: 192 for September 2021, 231 for November 2022.

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.

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)⁷ and the Council’s AH web pages.

⁷ <https://www.cornwall.gov.uk/media/qjyhrypo/final-housing-spd-feb-2020.pdf>

Acknowledgements

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

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.