PLANNING COMMITTEE – 4 NOVEMBER 2026

REPORT FOR DECISION

CORNWALL LOCAL PLAN SCOPING CONSULTATION RESPONSE

Culture	Money & Decision Making	Places & Resilience	People & Wellbeing	Facilities & Open Spaces
				
		✓	✓	✓

Recommendation:

Subject to any changes and/or additions requested by this Committee, the proposed response from Penzance Council to the Cornwall Local Plan Scoping Consultation, as set out at Appendix 1 to this report, be approved and submitted to Cornwall Council.

Background:

Cornwall Council has been conducting a scoping consultation for the new Cornwall Local Plan and the consultation documents can be found here:-

Cornwall Local Plan – Scoping Consultation | Let's Talk Cornwall

A Member of this Committee has drafted a response to the consultation, set out at Appendix 1 to this report, and it has been submitted for consideration in order to allow it to become the formal response of Penzance Council.

It is therefore recommended that, subject to any changes and/or additions requested by this Committee, the proposed response from Penzance Council to the Cornwall Local Plan Scoping Consultation, as set out at Appendix 1 to this report, be approved and submitted to Cornwall Council.

Appendix 1 – Proposed Cornwall Local Plan Scoping Consultation Response

Elliot Ridington
Democratic Services and Governance Manager

CORNWALL COUNCIL LOCAL PLAN SCOPING CONSULTATION – PROPOSED RESPONSE FROM PENZANCE COUNCIL

2. Growth and distribution		
Brief description	**Draft Penzance Council response**	**Rationale**
Understanding the differences between our places (Q4 and Q5 of survey) The scoping exercise recognises that not everywhere is the same, and proposes that the way Cornwall plans for growth should differ between the four broad areas that make up Cornwall (West, Mid, South East and North), to reflect differences in settlement relationships, topography, transport connections and population/employment density.	We welcome this approach, which would enable the Local Plan to take account of the distinctive characteristics of West Cornwall (including Penwith and the Penzance Parish) in terms of: • constraints (designated landscapes, heritage assets, and valued local spaces as designated in the Penzance Neighbourhood Plan); • settlement pattern (generally dispersed rather than urban); • connectivity (including remoteness from key facilities such as Treliske, especially for the 30% of residents with no car); • vulnerability to climate risks such as river and surface water flooding from rapid response catchments, compound flooding events (inland and tidal storm surge combined), and water scarcity (the recently-declared Severe Drought zone maps almost directly on to the West Cornwall character area); • high density and distinctiveness of heritage assets.	The existing Local Plan and Site Allocations DOD adopted an approach focusing development on specified “main towns” (including Penzance), with relatively little regard paid to the distinctive characteristics of each town and its hinterland, or to the proximity of major employment centres and critical healthcare facilities. The proposed new approach moves away from a “one-size-fits-all” approach, and is more closely aligned with the “local first” approach inherent in neighbourhood planning, as embodied in the Penzance Neighbourhood Plan.

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CORNWALL COUNCIL LOCAL PLAN SCOPING CONSULTATION – PROPOSED RESPONSE FROM PENZANCE COUNCIL

2. Growth and distribution		
Brief description	**Draft Penzance Council response**	**Rationale**
Reasonable alternatives for general housing growth (Q11 of survey) 1) Continue existing local plan strategy 2) Highly distributed growth using a fixed percentage for each place 3) Growth focused on strategic urban areas 4) Rural regeneration	We do not support option 1 or option 2. Option 1 has failed to deliver the right kind of housing in the Penzance parish for the people who need it most, with the key allocated sites effectively undeliverable under current conditions. Option 2 pays no regard to the distinctive and diverse characteristics, constraints and opportunities of each of the individual communities across Cornwall. Our preference is for a hybrid of Options 3 and 4: focusing growth on those strategic urban areas best placed to accommodate it (with reference to connectivity, landscape sensitivity, employment, infrastructure, etc.) under Option 3, while tilting towards the rural regeneration model (Option 4) in those character areas (mainly West and North Cornwall) with a more dispersed settlement pattern and more sensitive landscapes. Given the recent declaration of a severe drought in parts of Cornwall, there is a strong case for water scarcity to be considered as a factor in assessing the reasonable alternatives.	Cornwall Council's own analysis refers to significant challenges around Options 1 & 2. For Option 1, those include some areas having increasingly less capacity for growth without significant infrastructure investment; failure to respond fully to changes priorities around climate resilience; and failure to deliver due to market realities. For Option 2, potential challenges include the risk that development would not be located where new homes and jobs are most needed; risk of increased car dependency; and failure to reflect landscape constraints. By contrast, a combination of Options 3 and 4 has the potential to direct growth towards areas with the strongest infrastructure, while also allowing for more modest growth to help preserve and enhance the vitality of more dispersed settlements.

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CORNWALL COUNCIL LOCAL PLAN SCOPING CONSULTATION – PROPOSED RESPONSE FROM PENZANCE COUNCIL

3. Draft Local Plan and Minerals and Waste Plan Visions		
Brief description	**Draft comment**	**Rationale**
Vision V.1.1: Deliver a wide range of housing types with a focus on affordable and lower cost homes **Vision V.1.2: Build homes for every stage of life, including meeting specialist and supported housing needs for our communities** **Vision V.1.3: Deliver accessibility and flexibility in new homes to allow people to stay in their homes for longer**	We support these elements of the vision for housing, especially the focus on affordable and lower cost homes in V.1.1. However, there is no specific mention of social rent housing, which for many lower-income households remains the only truly affordable solution. Increasing social housing as a proportion of new dwellings built would also retain value within the public sector, by reducing the amount of housing benefit paid out to private-sector landlords. And while the vision itself is laudable, it is hard to see how a focus on affordability can be sustained in a situation where government-mandated targets are measured by the crude metric of homes delivered, with no weighting to reflect social value. The concept of social value is included elsewhere in the scoping documents – specifically, to support the development of rural and heritage businesses that would otherwise struggle to find sites. The new Local Plan presents an opportunity to pioneer the wider use of social value as a criterion in allocating and consenting development in Cornwall. Finally, the measurable outcomes for this vision refer to the "value zones" used to determine affordable housing quotas. We would urge Cornwall Council to revisit the current status of the Penzance parish (Value Zone 4, 30% quota) in line with the growing affordability gap that has arisen in our area since the current Local Plan was prepared.	Vision statement V.1.1 in particular is closely aligned with the spirit and letter of the Penzance Neighbourhood Plan; the exception is the omission of social housing, which Penzance Council's 2022 report on the housing crisis ("Trapped!) identified as a crucial missing link in local housing provision. As regards housing targets, "Trapped!" summed the situation up like this: "*The top-down approach has failed: measuring the success of housing policy in terms solely of the number of dwellings (without consideration of type, quality or affordability) has proved a crude and perverse metric, especially given that the top-down housing target for Cornwall was uplifted by 4,500 to reflect forecast demand for second homes*". And since our report was written, new government targets have been set that once again embed second homes in the baseline for future growth: because the baseline is now our existing housing stock, every second home or holiday let in Cornwall is counted as a "home" in calculating the mandated target. In terms of affordability and value zones, "Trapped!" highlighted a widening affordability gap, as market prices rose much faster than local average incomes. Although house price inflation has eased since our report was issued, the affordability gap is still baked into the market now.

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CORNWALL COUNCIL LOCAL PLAN SCOPING CONSULTATION – PROPOSED RESPONSE FROM PENZANCE COUNCIL

3. Draft Local Plan and Minerals and Waste Plan Visions		
Brief description	**Draft comment**	**Rationale**
Vision V2: Planning decisions and infrastructure investment will help build and maintain services, active travel opportunities, and reduce car dependence Measurable outcome 4 – number of homes developed in locations within walking distance (400m) of a frequent bus service	We support this vision, which reflects our own commitment to supporting active travel within the Penzance parish. And reducing car dependency is particularly important in areas like ours where some 30% of households do not own a car. However, "measurable outcome 4" is inappropriate as an indicator for the sustainability of public transport links for new developments. In practice, bus stops should be treated as "dynamic infrastructure" – in other words, they are not fixed or permanent. Recent experience, in our area and elsewhere in Cornwall, has shown that bus services can be amended and withdrawn at very short notice. So there is no guarantee that proximity to a bus stop at the time planning consent is granted will still apply when the development is built, let alone over the whole lifetime of the development. A further issue with this metric is that even a 400-metre distance can present accessibility barriers, especially where there are topographical challenges and/or main roads to be crossed.	The principle of favouring active travel and public transport access is embedded into the Penzance Neighbourhood Plan, and also in the many interventions identified in the Penzance Local Cycling and Walking Infrastructure Plan. The issue identified with "measurable outcome 4" is particularly relevant in our parish, where changes in bus services have often left residents without a frequent service. Our objection to this metric is also consistent with past comments made by our Planning Committee, expressing concerns about proximity to bus stops being cited by applicants as evidence of sustainable public transport links even where the bus stop cited is not easily accessible from the development site.

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CORNWALL COUNCIL LOCAL PLAN SCOPING CONSULTATION – PROPOSED RESPONSE FROM PENZANCE COUNCIL

4. Delivering homes and supporting economic growth		
Brief description	**Draft comment**	**Rationale**
Second homes and short-term holiday lets **POLICY C/HO23 – Principal Residence/ managing short term lets** This scoping paper suggests taking this policy into the scope in order to explore whether a targeted approach could be applied to restrict new second homes and short term lets in parts of Cornwall with an identified issue with reduced community sustainability as the result of second homes and short term lets. The paper also acknowledges that "the role of second homes, holiday accommodation and short-term lets remains an important consideration in some communities", but also that "without an additional use class for either use we are unable to control numbers of existing or new second homes or short term lets".	While we recognise that at present there is no additional use class for second homes and short-term lets within national planning policy, we share Cornwall Council's view that this is an important consideration in communities (like ours) where housing pressures are greatest – and that without that use class, it is difficult to control numbers of second homes and holiday lets. However, we would welcome the inclusion in the Local Plan of a policy addressing this issue, supported by evidence demonstrating the impact on those Cornish communities (including our own) that are most affected. This could potentially be accompanied by a "sleeper" policy that could be activated in the event that the new use class is created in future – either by a change in national policy, or through devolution of powers to Cornwall.	This policy change was supported in Penzance Council's 2022 report on the housing crisis, and in the Penzance Neighbourhood Plan. In both cases, it was backed by a solid evidence base showing the proliferation and impact of second homes and holiday lets within the Parish.

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CORNWALL COUNCIL LOCAL PLAN SCOPING CONSULTATION – PROPOSED RESPONSE FROM PENZANCE COUNCIL

5. Creating high quality, sustainable places		
Brief description	**Draft comment**	**Rationale**
Policy C/TR12 – Distribution centres and networks Potential policy to promote clustering of distribution networks and facilities	This policy could be used to support the provision of groupage hubs and "final-mile" EV delivery services, to relieve the pressure on the narrow and often congested streets in many Cornish towns. For example, a final-mile groupage hub on the Long Rock Industrial Estate would keep large HGVs out of Penzance town centre, which could instead be served by a fleet of smaller electric delivery vehicles. A hub of this kind could also serve as a recharging station for a future fleet of small electric Hoppa style buses to provide more frequent shuttle services in the broader Penzance area, as well as providing EV charging points for the general public.	Even before the traffic restrictions and public realm changes to Market Jew Street, large delivery lorries were causing issues in Penzance town centre – not just congestion, but also noise and air pollution. A final-mile EV fleet could address these issues, giving us cleaner streets and potentially more flexible delivery times for local businesses.

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CORNWALL COUNCIL LOCAL PLAN SCOPING CONSULTATION – PROPOSED RESPONSE FROM PENZANCE COUNCIL

5. Creating high quality, sustainable places		
Brief description	**Draft comment**	**Rationale**
Policy C/HC10 – Health Impact Assessments This scoping paper proposes carrying out a Health Impact Assessment as part of the plan preparation process, to help "understand the impacts and opportunities of planning policies and allocations". It also considers the option of introducing a trigger whereby certain "scales of development" would be subject to a further Health Impact Assessment.	Here in the Penzance parish we have significant health inequalities, so it is important to embed health and wellbeing into planning policy and decisions for the sake of current future generations. So we strongly support the principle of carrying out a Health Impact Assessment not only as part of the plan-making process, but also for individual development proposals of significant scale. And better health outcomes generate positive benefits right across the board, both for individual residents and to relive pressure on NHS services by keeping people healthier. However, we would suggest that the threshold for individual Health Impact Assessments be set at a lower level than the 1500 dwellings mentioned in the NPPF (and referenced in scoping paper 4 on homes and growth). While 1500 might be a reasonable threshold in a densely populated urban area, it would not be appropriate in Cornwall where few (if any) development proposals are on this scale, and where even a development of 250 or more dwellings can have a potentially significant impact on health and wellbeing. Any such assessment should consider not only design and layout (such as open space and play areas), but also factors such as accessibility of healthcare facilities, existing health inequalities, and the impact on the existing community.	The Penzance Neighbourhood Plan included a chapter on Health and Wellbeing, but because of the plan's narrow remit was unable to translate our focus on these issues into specific planning policies. This is an opportunity to ensure that health outcomes are integrated into the planning process, which over time should help to address the known health inequalities in our area – building on the work already under way with the "Lets Go Penzance" project under the auspices of Sport England and Active Cornwall, and by many others within the local public and voluntary sectors.

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6. Conserving and enhancing the environment		
Brief description	**Draft comment**	**Rationale**
Policy C/F 10 – Flood risk management This scoping paper recognises the significant risks from coastal change and unpredictable weather events we face in Cornwall, and that the previous plan approach failed to result in actions to address those issues. Policy C/F10 (Flood risk management) addresses the need to safeguard land for strategic flood management capacity, and references green infrastructure and natural flood management as policy considerations. However, it does not specifically reference foul water drainage infrastructure as an issue, and does not refer to the risk of compound flooding events.	The Penzance Neighbourhood Plan included extensive narrative and a comprehensive policy covering flooding and drainage (policy DDH8), reflecting the many challenges we face in our parish. Specifically, the PZNP referenced the combined sewer system (surface + foul water) that serves most of the Penzance parish, and the need to ensure that new development does not overload it. This issue should directly addressed through planning policy. We also believe that the characterisation (in scoping paper 7) of foul drainage systems as "dynamic" (i.e. "adaptable, and planned in response to specific developments") is not aligned with reality of such systems in places like the Penzance parish, where the ageing combined sewer systems can better be characterised as "fixed" infrastructure" that is not easily adapted. We also recommend that the policy framework takes account of compound flooding events (river flooding combined with tidal storm surges), to which Cornwall is at particular risk. More generally, we would encourage Cornwall Council to look carefully at PZNP policy DDH8 as a potential template for a policy approach.	Although the plan is still at the scoping stage, and much work needs to be done on the detail, it is important to flag up these two key issues that not only affect us here in the Penzance parish, but also many other communities around Cornwall.

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CORNWALL COUNCIL LOCAL PLAN SCOPING CONSULTATION – PROPOSED RESPONSE FROM PENZANCE COUNCIL

6. D raft engagement strategy		
Brief description	**Draft comment**	**Rationale**
Engagement approach The engagement strategy commits to a "transparent and honest process", such that "everyone that is involved in the plan should have access to clear information and understand how decisions are being made". However, the only commitment to display consultation materials in paper form is at Cornwall Council's three main offices in Truro, Bodmin and Penzance.	We do not regard the arrangements for people to access paper consultation materials as adequate. There are only three locations named (in Penzance, Bodmin and Newquay). It is understandable that the main emphasis is on digital responses to the consultation, given cost and resource constraints. However, there are many people across Cornwall who are digitally excluded, and those people are not well served by the consultation materials being available at only three locations in such a large geographical area. This will be particularly important when the draft plan progresses to spatial strategies and site allocations, when it will be crucial for local residents across Cornwall to view legible, hard copy maps of their area to see how the proposals may affect them. One option would be to approach the larger town and parish councils to display consultation materials in their own offices. And while the digitally excluded may be able to access the materials at drop-in events, that would be dependent on them being able to attend on a specific date and time.	Experience in past consultations for the Penzance Neighbourhood Plan showed that many residents prefer to use paper rather than online consultation materials. There are around 45,000 digitally excluded people in Cornwall, and there are likely to be many more who – while they may technically be digitally enabled – nonetheless find it difficult to access and view complex maps on their devices, or respond to online consultations. While the impact on residents of the Penzance parish is relatively limited because of the availability of copies at St Johns Hall, in the interests of a "transparent and honest process" this option should be accessible to one and all.

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