

4th February 2022

To whom it may concern,

I write this response as the husband of a blind person who deals daily with the inaccessibility of the footways, we sighted individuals take for granted. I see the obstacles that others walk around as a matter of course and would not stop to think how the obstructions effect vulnerable individuals including wheelchair users, parents with buggies and prams, elderly people and individuals with visual impairment.

My profession is as a Town Planner, and I am a Licentiate member of the Royal Town Planning. I have recently taken and passed with distinction an MSc in Planning at Plymouth University and I currently work as a Town Planner at a highly respected private planning consultancy in Truro. My views are therefore based in practice and seek to address these issues from a planning perspective.

I also write this having contributed to the Housing policies contained within the draft document.

Something that is clearly an issue in the streetscapes we inhabit is the ever-present problem of pavement parking. Pavement parking is the result of poor design and whilst it is almost impossible to solve old and existing problems, other than through legislation, it is possible to design out the issue in new development.

I strongly welcome Policy HO2: Design of Dwellings. It is clear to me as a professional planner that it is very easy to circumnavigate the allocation of settlement boundaries that are so tightly drawn as to deter development. People must live somewhere and adjacent to the settlement boundary is an easy win. In addition, there are multiple SHLAA sites already allocated in Perranporth outside of the settlement boundary so expect Perranporth to grow greatly in the next decade with little recourse to valid objection. My point is that there will be hundreds of additional households that we as a community can do little to stop under the current framework and therefore it is better to design out the bad and include the good.

My main concern is footway (Pavement) parking. The foot way is a legal part of the highway and obstruction is a punishable offence; however, that fact is little known and even less enforced upon. From this point on I will refer to the footway as the pavement. Most people consider parking on the pavement a civic duty to allow emergency services to pass and to be neighbourly. This results in a form of half on-half off pavement parking which is obstructive to vulnerable members of the community such as wheelchair users, visually impaired, elderly and parents with pushchairs whilst not fully obstructing the pavement and is therefore not illegal. The obstruction can be so great for some members of the community that they choose to not go out rather than expose themselves to the risk of entering the highway or, having pointed out the inaccessibility to the culprit, verbal and physical abuse. This again results in vulnerable members of the community choosing to stay home rather than risk it.

So, getting to the point:

Policy HO2 is excellent and provides policy to assist case officers in their decision making that can address the above issues, particularly at HO2 1vi.

Policy HO3 fails at point 1 i). A policy that allows a planning application to pass based on ‘A *development proposal for housing development will be supported where it: i) at least meets the requirements for number and type of spaces specified by the most up to date Cornwall Council parking standards, and exceeds them where feasible and viable*’

This is a failure of policy as it allows a planning consultant, such as me, acting on behalf of multinational builders to apply the minimum standard to the development. The Cornwall Council Design Guide 2021 (CDG 2021) **does not provide a figure for how many spaces should be allocated to a new built property**. It can be none in a sustainable location as it can be argued that the person living there will utilise the bus to go to work in Bodmin, Truro or St Austell. Perranporth is a sustainable location, and the busses are not full of commuters.

I could argue strongly that I have met the design standards as set by Cornwall Council in their statutory plan and additionally have met the requirement as set out in HO3 1.i) as the policy stands.

The CDG 2021 is specifically imprecise to allow this function and it is for the Neighbourhood Development Plan (NDP) to set the required standard. Major developers will use the terminology ‘*and exceeds them where feasible and viable*’ ‘to argue just that- that two spaces side by side are not feasible and viable and they will use the NDP and its intention to stop pavement parking as a weapon to enable just that. A point in case are the two new estates on Liskey Hill. Take a walk or drive around either at a time when residents are at home, and you will see the proliferation of pavement parking. It is so endemic that there is an image within the CDG 2021, that discuss good design of boundary walls, has an image of pavement parking occurring in their flagship, prize winning ‘The Coast’ estate.

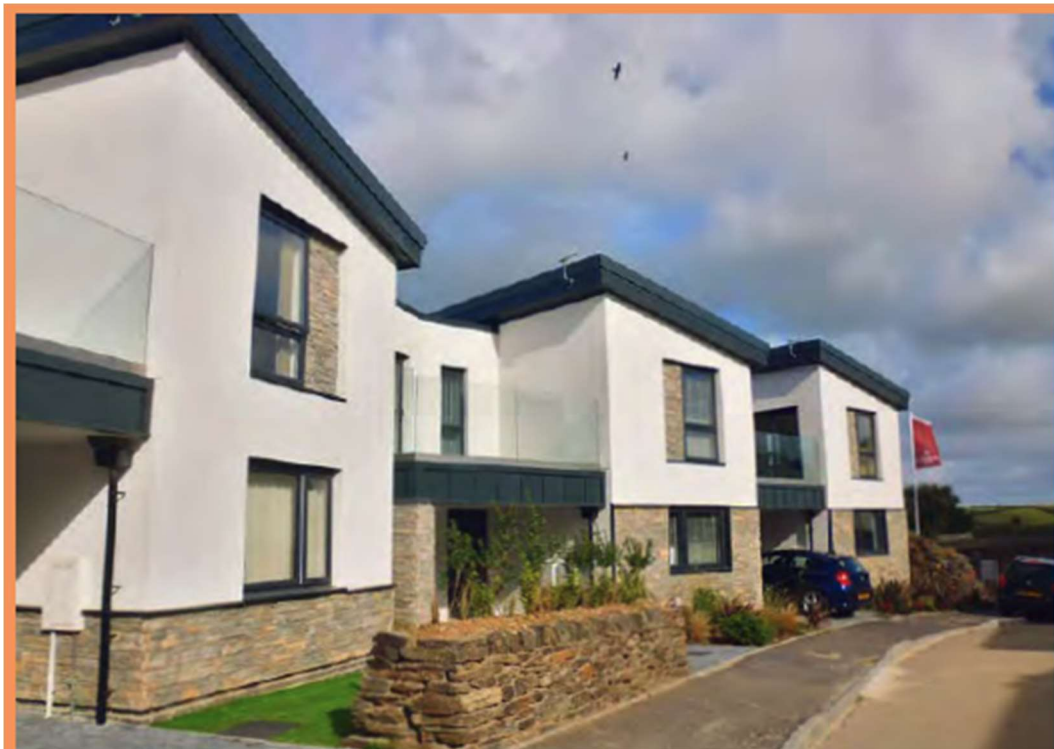


Figure 1: The CDG 2021:30

If they design the road thinner, it is cheaper. If they design, no parking spaces or singular width parking spaces they can squeeze more houses onto the site in the interests of viability and the council will lap it up as they will be providing the affordable housing requirement. It is a circular problem which can be eliminated by good design policy with positive, active wording.

I suggest removing reference to adhering to the Cornwall Local Plan 2016 (CLP 2016), and the CDG 2021 regarding parking as this will be considered as a material consideration as a matter of fact. The policy withing the CDG 2021 is at pages 46,47.

In HO3 1. ii) the starting word 'preferably' is weak and will not be adhered to.

The NDP is here to enhance those provisions and provide the Parish with policy input addressed to specific needs of our community. It is 100% allowed and actively encouraged to add to the CDG 2021 and CLP 2016. In fact, when adopted, the NDP becomes part of the statutory plan to be considered for applications in this Parish, a fact I am sure you are well aware of.

I therefore propose a much stronger active and positive construction of the policy. I respectfully suggest that Policy HO3 read as following:

1. A development proposal for housing development will be supported where it meets parking needs following the hierarchy as set out below:
 - i) Provides a minimum of two off street, within plot parking spaces per unit. Side by side, where possible, in line if not. Or,
 - ii) Alternatively, provides a minimum of two spaces per unit and a further one visitor space per every two units in an off-street parking design that adheres to the National Design Guide 2019 M3 and Building for a Healthy Life. Or,
 - iii) Where within plot off-street or off-street parking areas are not feasible, alternative, innovative on-street parking design within the development will be supported where it responds positively to the Perranzabuloe Design Code 09, the National Design Guide 2019 Policy M3, the Building for a Healthy Life and contains 2 spaces per individual unit and a further one visitor space for every two units.

2. A development proposal for housing development will be supported where it:
 - i) does not introduce a need for additional demand for parking on the existing road network; and,
 - ii) on redevelopment and replacement housing sites, there is no loss of existing on-site parking capacity, and the new development conforms to policy HO3 1.

I hope that you find the response helpful. I am more than willing to engage in discussion on this subject and if necessary, arrange a walkthrough of the town and its streetscapes with members of the community that are vulnerable, so that you may see the veracity of the argument.

Yours faithfully,

