

Penzance Neighbourhood Plan Regulation 14 Consultation – Individual resident Comments

INTRODUCTION and CONTEXT SUMMARY

Page no. / policy ref.	Comments
	no specific comments.

Thank you for taking the time to provide comments on the Plan.

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THE PLAN'S OVERALL VISION AND COMMUNITY VISION STATEMENTS

Page no. / policy ref.	Comments
	I am pleased to see that the community vision statements have been included in full. However, it is disappointing that there is no reference to the methods of their preparation. For example, I am aware that both the Newlyn & Moncelio plans involved extensive consultation, which has been fully documented. There is also no explanation why the NP deviates from these statements in some significant ways - see further comments in environment section.

DEVELOPMENT, DESIGN AND HERITAGE

Page no. / policy ref.	Comments
	There are various references in the plan to 'high quality developments'. I assume this means high quality design, and wonder why this is not specifically spelled out. Further, there is no mention of how good design will be achieved in these projects. It is not not sufficient to rely on the Development Control process to achieve this - Cornwall Council, and PZ Town Council need to be far more proactive. See my separate suggestions.

ECONOMY

Page no. / policy ref.	Comments
	No specific comments.

Thank you for taking the time to provide comments on the Plan.

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HOUSING

Page no. / policy ref.	Comments
	I fully support the policies relating to the need for much more social housing, and greater controls on second homes.

NATURAL ENVIRONMENT AND GREEN INFRASTRUCTURE

Page no. / policy ref.	Comments
	I believe the policy suggestions for 'buffer zones' in the Paul and Monsehole area are deeply flawed, and go against the community vision statements. See separate sheet for further explanation.

COASTAL VULNERABILITY

Page no. / policy ref.	Comments
	<p>No specific comments.</p>

Thank you for taking the time to provide comments on the Plan.

PENZANCE TOWN CENTRE AND WATERFRONT

Page no. / policy ref.	Comments
	<p>I support the proposal to concentrate efforts on improving the three zones around the town centre, the bus & train stations and the headlands. However, there is little mention of how high quality design will be achieved in these areas. The two local authorities need to commission and adopt an urban design framework in each of these areas, and then should engage an urban design practice, with an excellent track record, for this purpose.</p>

Page no. / policy ref.	Comments
	<p>I also agree with the need to improve the public realm in the centre of Newlyn. This is a complex problem that needs to address the needs of pedestrians and all the thriving small businesses. As with the Penzance zones, this urgently needs an imaginative urban design framework that brings together solutions for the current problems of degraded public realm, traffic, parking, etc.</p>

The draft plan fails to mention the Newlyn Filmhouse in the list of cultural facilities. This is a nationally important cinema that shows national premieres of some films (eg. Elysium, Bait).

OTHER / GENERAL COMMENTS

Comments
<p>I am impressed by the amount of work carried out in the preparation of the plan. It successfully documents all the analysis, and describes well thought out ambitions for the parish. It has been clearly been very challenging to bring together the issues and proposals for the disparate communities, and if there is a fault, it is that there has been a concentration of Penzance at the expense of the rural communities of on the fringes. Hopefully the final plan can redress this imbalance.</p>

Comments on the 'Buffer Zone' policy around Paul, Sheffield, Trevithal, Penzance and Mousehole.

The starting point for this policy has to be the Cornwall Local Plan, formally adopted in 2016. In section 2.33 this states that 'open countryside is defined as the area outside the physical boundary of existing settlements (where they have a clear form and shape). The plan seeks to ensure that development occurs in the most suitable locations in order to protect open countryside from inappropriate developments.

the PZNP recognises this policy and states 'one of the main outcomes of public consultation during preparation of the Cornwall Local Plan was the importance of retaining the separate identity of settlements.' Further it states (P.112) that 'Public consultation on the NP has reinforced the importance (of maintaining individual and distinctive characters) which applies equally to Marsehole and Paul given that they are in close proximity, yet remain distinctive communities!'

The Paul Vision Statement applies equally to the four settlements of Sheffield, Trevithal, Penwa and Paul, and its first priority is stated as follows:
'Maintain the distinctiveness of a historic group of small villages/hamlets separated and surrounded

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by a green envelope of predominantly high quality agricultural land, mostly within designated Areas of Great Landscape Value and the South Pen with ANOB! This is illustrated on the plan of the area, showing the boundaries of the hamlets set within a broad buffer zone / open countryside where new development should be resisted.

In spite of what has been written in the Cornwall Local Plan and earlier section of the draft PZNP, the plan in Appendix 12 (Green Buffers) shows only a small proportion of the open countryside around Paul and Mousehole protected by Green Buffers. Although all the other land around the four hamlets ~~is~~ is protected to some extent by the Cornwall Local Plan policy listed above, the failure to designate it as a 'Buffer Zone' in the PZNP indicates a lower level of protection. As it stands, the policy for buffer zones around Paul and Mousehole goes against the Vision Statement that has been produced for Paul, Sheffield, Trevithal and Penolva following extensive public consultation.

The need for the extension of the buffer zone to all the land around these villages has been demonstrated by recent planning applications outside the village envelopes. For example, at Todden Coath farm between Sheffield and Paul, where there have

been various applications to convert an unused agricultural barn into several dwellings. These applications were rightly refused by Cornwall Council, and subsequent appeals were rejected by the Secretary of State. Had this proposal been outside the buffer zone, one can only speculate whether the Cornwall Council policy against development outside of village envelopes would have been enough to withstand the appeal process?

I therefore strongly urge the authors of the PZNP to extend the buffer zones so that they encompass all the open countryside between the developed areas of Paul, Trevithal, Rendwa, Sheffield and Mousehole.

Achieving design quality in Penzance Town Centre, Waterfront & Newlyn.

The aim of the PZNP should be to ensure that, through new development and improvements, these four places become great places. Great places can be defined as locations that work for people in social, physical and economic terms. They need to allow people to move easily along all the desire lines; they need to be safe in day and night; they should be attractive and well designed, and easy to maintain; where appropriate, any retail or commercial premises should thrive and attract people into the spaces; and so on.

The process of bringing all these factors together, and resolving any potential conflicts is called 'urban design'. This is not the same as architecture, which is the design of individual buildings, or town planning, which is about the ~~the~~ design of whole towns or parts of cities. Urban Design is a specific skill that sits between the two.

Successful urban design is best carried out independently of individual interests. For example, if the urban designers are working for the developers of new buildings, they may be required to put economic factors ahead of the interests of the public.

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A good way to proceed, where some of the land or buildings are owned by a local authority, is for the authority to engage experienced urban designers, and work with ~~them~~ them to develop a brief and then an 'urban design framework'. This can then be used as a basis for developing detailed schemes. Where there are a number of owners or developers within the area, it can be used to co-ordinate the design. Some local authorities have urban designers in house, or there are a number of private practices, regionally or nationally.

It is unrealistic for these urban design frameworks to all be produced in advance of the Neighbourhood plan. However, in order to ensure high quality design in the four areas identified in the ~~the~~ PZUP, I believe there should be a commitment to prepare them in advance of any developments.