

**TORBAY LOCAL PLAN - A landscape for success: The Plan for Torbay – 2012 to 2032 and beyond**

PROPOSED SUBMISSION PLAN (FEBRUARY 2014)

**PROPOSED MAIN MODIFICATIONS TO THE SUBMISSION LOCAL PLAN**

**LIST OF REPRESENTATIONS BY PERSON/ORGANISATION IN TOPIC ORDER**

<b>Consultee ID</b>	<b>File No.</b>	<b>Person /Organisation Consultee</b>
900132	B1	Watcombe Childrens Centre Nursery (Nik Salter)
847469	B2	South West HARP Planning Consortium

**Pickhaver, David**

**From:** Admin - Gmail [REDACTED]  
**Sent:** 16 March 2015 11:07  
**To:** Planning, Strategic  
**Subject:** Policies SS11 Housing and SDT4 Babbacombe and St.Marychurch objection

Hi,  
 We would like to object to the building of houses on the green field at Steps Cross playing Fields.  
 The reasons are :

- The severe impact on traffic in the neighbourhood
- The loss of recreational amenity

As a nursery we use this space with our children and the loss of the field would be a great loss to the local area. Moor lane is congested enough now, having 3 schools in close proximity, who have very little parking on site. With an extra 70 houses, each home having 2 cars, and the plans will not show 140 parking spaces, will overflow into Moor Lane. This will be dangerous for the children and local traffic in the area.

These homes will be family homes? Where will they go to school? Watcombe Primary school is already near capacity and has been for a number of years.

Please do not allow building on this valuable space.

Many thanks

Nik Salter  
 Director

Watcombe Childrens Centre Nursery  
 Moor Lane  
 Torquay  
 TQ2 8NU





847469

B2

Tetlow King  
PLANNING

Unit 2 Eclipse Office Park High Street Staple Hill Bristol BS16 5EL

Local Plan  
Spatial Planning  
Torbay Council  
Electric House (2<sup>nd</sup> Floor)  
Castle Circus  
Torquay  
TQ1 3DR

Date: 20 March 2015

Our Ref: EB/CB M6/0209-12

Your Ref:

By email only:  
[strategic.planning@torbay.gov.uk](mailto:strategic.planning@torbay.gov.uk)

Dear Sir or Madam

**RE: CONSULTATION ON THE SCHEDULE OF PROPOSED MAIN MODIFICATIONS TO THE LOCAL PLAN**

We represent the **South West HARP Planning Consortium** which includes all the leading Housing Association Registered Providers (HARPs) in the South West. Our clients' principal concerns are to optimise the provision of social/affordable housing and to ensure the evolution and preparation of consistent policies throughout the region.

#### MM1

In our previous representation to the Torbay Local Plan Proposed Submission Plan (FT M6/0209-10) we made objection to the housing target as it did not reflect the objectively assessed housing target for Torbay. Although a target of 10,000 is an improvement, this will still not provide the required number of homes. We discuss this in more detail below.

We also reiterate our concerns over the evidence base the housing target is based on. A SHMA from 2007 is clearly out of date, see for example East Devon where the Inspector stated: *"the 2007 SHMA is 6 years old and cannot be considered to be up to date"* (Inspector's comments to Hearing 3 (Housing)).

#### MM7

As highlighted above, the Council's housing target is not a true reflection of actual housing need. While we concede that the Inspector is content to proceed with this target subject to early review, and note the modifications to Policy SS17 which incorporate measures for monitoring and said review, we must query the benefit in proceeding with this approach.

It is almost certain that a review will be needed very soon bringing back into question the appropriateness of the housing target, especially given that the modifications state that this will be *"triggered where there is evidence that the provision of housing will not keep pace with the need to provide for economic growth"*.

There is every indication that a jobs-led review will be forced given that Policy SS4 is promoting the creation of 5-6,000 jobs over the plan period; this has not been amended in the modifications. Paragraph 2.3.2 of the Torbay Local Plan Evidence Study 2013 Final Summary Reports already points to an uplift from the 10,000 where stating that:

*"The scenario developed specifically for this project indicate that over the plan period there could be a net addition of 5,300 jobs. This level of job growth would require the development of 12,278 new homes"* (emphasis added).

Another trigger which we suggest should be added to the list is progress in affordable housing delivery. Clearly the 10,000 target will be insufficient to meet the objectively assessed need for 9,840 affordable homes over the plan period (based on the SHMA Torbay Update 2011 identifying a need for 820 dwellings per annum, with around 60% being affordable). The Council's monitoring of delivery should inform a review if the affordable housing provision falls significantly below this level as the implications for Torbay would be considerable.

### **Affordable Housing**

In our separate representation EB/CB M6/0209-13 we have questioned modification AM129 and its appropriateness of being considered as an Additional Modification; this is because it involves a fundamental change to Policy H2 (Affordable Housing). Though we recognise the change was made to ensure the plan is in conformity with new 10 unit threshold in the PPG, we are concerned that the affect this will have on the delivery of affordable housing has not been identified and accommodated in the plan possibly via further uplift in the housing target. We draw the Council's attention to Paragraph 029, Section 2a of the NPPG (Reference ID: 2a-029-20140306):

*"an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes"*

We would like to be informed of the progress of Local Plan. Please ensure that the **South West HARP Planning Consortium** are retained on the LDF database, with **Tetlow King Planning** listed as their agents.

Yours faithfully



**CHRIS BURTON MPlan**  
**ASSISTANT PLANNER**  
For and On Behalf Of  
**TETLOW KING PLANNING**



cc: Aster Group  
DCH Group  
Guinness Partnership  
Sovereign Housing Association  
Spectrum Housing Group  
Westward Housing Group

Jeannie Haycock, Housing Department



Local Plan  
Spatial Planning  
Torbay Council  
Electric House (2<sup>nd</sup> Floor)  
Castle Circus  
Torquay TQ1 3DR

Date: 20 March 2015  
Our Ref: EB/CB M6/0209-13  
Your Ref:

By email only: [strategic.planning@torbay.gov.uk](mailto:strategic.planning@torbay.gov.uk)

Dear Sir or Madam

**RE: CONSULTATION ON THE ADDITIONAL MODIFICATIONS TO THE TORBAY LOCAL PLAN**

We represent the **South West HARP Planning Consortium** which includes all the leading Housing Association Registered Providers (HARPs) in the South West. Our clients' principal concerns are to optimise the provision of social/affordable housing and to ensure the evolution and preparation of consistent policies throughout the region.

**AM129**

We are surprised to see this included in the Additional Modifications on the basis of the Council's presumption that:

*"These are considered to be changes that do not go to the heart of the Local Plan's soundness, but are clarifications, updates or minor changes to the Plan."*

We believe that this particular change is more than a clarification to the plan as it is a wholesale change to Policy H2 (Affordable Housing) and will have an immediate impact on the Council's ability to deliver affordable housing across the plan period. This does not seem to have been taken into consideration and no new mechanism has been identified to make up the potential shortfall that will arise from the inability of the Council to secure delivery on smaller sites.

In our view it would be reasonable to contemplate whether there is further need for uplift in the housing target beyond the current 10,000. We draw the Council's attention to Paragraph 029, Section 2a of the NPPG (Reference ID: 2a-029-20140306):

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[christopher.burton@tetlow-king.co.uk](mailto:christopher.burton@tetlow-king.co.uk)

**cc:** Aster Group  
DCH Group  
Guinness Partnership  
Sovereign Housing Association  
Spectrum Housing Group  
Westward Housing Group

**Jeannie Haycock, Housing Department**

Pickhaver, David

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From:

Sent:

To:

Cc:



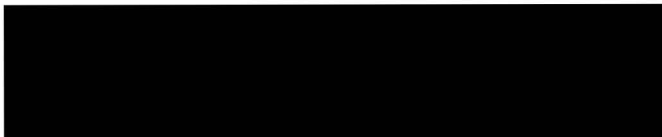
Subject: CONSULTATION ON THE ADDITIONAL MODIFICATIONS TO THE TORBAY LOCAL PLAN

Attachments: 0209-13.M6.pdf

Please find attached letter in respect of the above for your attention.

Kind regards

Gina Day  
Secretary  
**TETLOW KING PLANNING**  
Unit 2, Eclipse Office Park, High Street, Staple Hill, Bristol BS16 5EL



\*\*\*\*\*  
*This electronic transmission is intended only for the attention of the addressee. It may contain privileged and confidential information. If you have received this electronic transmission in error please notify us immediately by telephone, delete the transmission and destroy any hard copies.*

*Tetlow King Planning Ltd has used all reasonable efforts to ensure that this message and any attachments are free from viruses*

Pickhaver, David

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From:

Sent:

To:

Cc:



Subject:

CONSULTATION ON THE SCHEDULE OF PROPOSED MAIN MODIFICATIONS TO THE LOCAL PLAN

Attachments:

0209-12.M6.pdf

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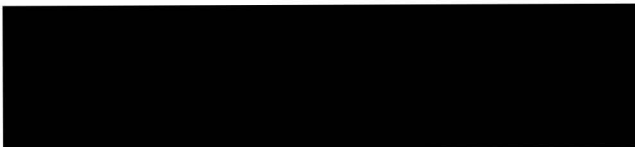
Kind regards

Gina Day

Secretary

**TETLOW KING PLANNING**

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F: [REDACTED]

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