

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

PROPOSED SUBMISSION PLAN (FEBRUARY 2014)

PROPOSED REPLACEMENT MAIN MODIFICATIONS TO THE SUBMISSION LOCAL PLAN

LIST OF REPRESENTATIONS BY PERSON/ORGANISATION IN TOPIC & ALPHABETICAL ORDER

Consultee ID	File No.	Person /Organisation Consultee	
Private Individuals – Paignton			
428525	PI1	Bristow	Roger
923422	PI2	Downing	Ben and Jane
417506	PI3	Gee	Adrian
829682	PI4	Lovejoy	Leaf
923426	PI5	Miller	Susan
558519	PI6	Parkes	Mike

Comments on RMM's and RAM's.

The reason for putting all the comments in one document is that some of the RAM's could be considered as RMM's and that both are interlinked and have an effect on each other.

Under "About this Document."

The jobs to be created total is even more unrealistic considering that Council documents show that there was a loss of 1,300 jobs in one year alone, added to which the amount of employment land that is now designated at 75% housing and 25% employment will automatically reduce both minimum and maximum job creation figures, not just maximum. Even then the numbers are ridiculously high considering that we are 3 years into plan and the FTE jobs are less than at the start of the plan and the job creation target for the first 5 years is higher than any other 5 year period; therefore the number of houses required are far too high especially as in the previous 10 years (2001 to 2011 census figures) 5,000 houses were built and there were less FTE jobs, and a very low increase in population. Mid range of the original plan for housing was 9,000, this has been reduced by only 100 houses but one year less time period effectively increasing the house per year from 450/year to 468.5/year! This fact alone turns the plan into a housing led plan not a Jobs and housing balanced plan, which will create an even bigger housing glut and job deprivation. Further proof of housing does not create jobs is that between 2008 and 2011 there were an average of 390 houses built per year and yet construction jobs fell by 600 (BRES) and total employed fell by 2,400 (BRES).

RMM1

SS1. I agree with safe guarding natural and built environment, and annual housing land monitoring, but would like to see net jobs (only those that are full time and above minimum living wage as they are the only ones that are likely to make housing purchase viable) monitored at the same time to help prevent housing outstripping jobs or vice versa. You cannot improve or maintain natural beauty of the bay by building on green fields, there is a lack of brown field sites being promoted in the early stages of the plan, which to me seems to be a case of build on all possible green fields to get the New Homes Bonus and then use brown fields, which is against the NPPF. 60/40 brown to green advice, this should be maintained in any single year of the plan and the large majority of the first 5 year housing already approved is on green fields, contrary to NPPF and therefore not sound.

450 houses per annum in the first 5 year period is excessive as we are 3 years into the period the job increase is still negative, meaning the job creation target is already a minimum of 825 jobs behind and 1,440 houses with planning permission ahead, which is a recipe for disaster for the Bay's economic growth. Again this makes the plan unsound. Add into these figures the number of empty houses now which makes the situation even more unbalanced.

Why has the job creation target been removed? Is it because it is no longer a balanced plan but just a plan to uncontrollably build as many houses as possible, as quickly as possible, and on green fields to get the maximum New Homes bonus before it is cut?

Identified sites. This section only takes account of an under build and ignores any possible over build due to lack of new net job growth or lack of economic growth, again making the plan unsound.

Strategic Delivery Areas:- All developments in the Future Growth Areas need to be subject to environmental impact assessment, as do all developments on green field land.

RMM2.

4.1.25:-Active developer interest in Future Growth Areas all of which are greenfield sites should have no bearing whatsoever on bringing forward these sites unless brownfield sites have been used to conform with the NPPF balance figures of 60% brownfield 40% greenfield, and all necessary infrastructure should be in place, not in tandem with, prior to development.

Paignton in particular has severe problems with clean and foul water capacity (currently a single pipe system much of which is of the Victorian era). There are already 2 sites in the White Rock area which South West Water are not satisfied with the applications attempt to satisfy the clean/foul water situation. There are also severe Infrastructure restraints in White Rock, Yalberton and Collaton St. Mary with regards traffic, all of which will have to pass through Tweenaway junction which despite improvements made and those proposed will be of little use without the hill section of Kings Ash Road being bypassed as widening it would only be possible by purchase and demolishing all the housing on this section which is impractical, and the bypass of this section was discounted years ago. The A385 from Tweenaway Junction to Totnes is already over capacity at busy times and improving flow will be difficult without Devon County's cooperation and considerable expense to all parties, which considering the consultants housing figures for Collaton St. Mary would make the whole scheme for this area unviable to developers unless major grants come forward from elsewhere. Environmentally the traffic pollution is already killing conifers along the road and one can't but wonder how much air pollution is affecting the school's pupils and teaching staff, so more would be even harmful, monitoring air quality at the school is urgently needed. Once again only under build is taken into account removing any balance in the plan between jobs and houses and is just an excuse to build whatever, wherever in order to overcome any local objections and to increase income by building on Council owned land and green fields to obtain more new homes bonus income. Plan is therefore unsound as it only considers more housing and not less and no link to FOAN or jobs!

RMM3.

All green field developments wherever they are in Torbay should be subject to EIA's and all must have mitigation for all protected plants and species which can be proven to work, or acceptable to Natural England along with other protection bodies.

RMM 3a.

As noted by comments on RMM 1, 60% into the first period and we still have negative job growth, zero hour contracts, part time and split shift working and lack of economic growth. All of which prevent the affordability of housing for local residents. I can see no possibility of the turnaround in job growth let alone achieving the lowest figure of job creation (1,250) in the next 2 years. Between 2008 and 2011 there were approximately 500 houses built/year and yet in the same period there was a loss of 600 construction jobs (BRES data) therefore proving that building houses does not grow jobs. Plan unsound due to being highly unlikely to achieving job growth targets.

RMM4.

Housing figure still far to high.

RMM5.

Such a high figure of housing cannot be achieved without harm to the environment, tourism (quality of environment), and economy (severe lack of jobs and no evidence of improvement in net job growth especially regarding jobs which would make housing affordable to locals). Why are local planning forums not mentioned in the consultation list? Again the plan only considering bringing forward sites and not the possibility of holding up sites until jobs are created and economic growth happens. Excess unaffordable housing is contrary to the principal of FOAN, NPPF 47, and a balanced plan and therefore another reason that the plan is unsound.

RMM6. DCLG projection figures should only be used as a guideline for the maximum because their projections figures have consistently been excessively to high year on year. This happens because of the failure to properly factor in Torbay's naturally decreasing population

and the calculation includes a set formula for growth, which does not take into account periods of depression and economic slump. Combining these two reasons would greatly reduce the current figure and would continue to reduce the projection until such time as the economy is back to its pre 2008 growth rate. Using these figures to promote increased house building is based on an inaccurate basis and is therefore unsound. Whilst economic success is highly desirable there is at present (3years into plan period) there is no indication of economic growth in Torbay, and no evidence of returning to pre 2008 inward migration. Correct figures show that up to 2012 it has been rapidly declining. To use these figures to show the need for increasing housing supply will cause a glut of housing and consequently an economic downturn and cause great harm to the soundness of the plan.

RMM 7.

SS12. New housing completions and permissions should also fall if viable net jobs creations do not meet expectation, in order to maintain a healthy balance of viable jobs/homes. This is missing from the modifications. It is worth noting that a development of a block of living assisted apartments has been put on hold by the developer until market conditions improve, this shows that the market is still in recession even with the number of homes for the elderly that are being closed, and although the area is one of the top 10 second homes areas in the country that there is little demand for new house. (Even the developers do not expect more than 20 to 25 completions per year on any one site)

New applications should not be permitted despite the rolling 5 year figure where:

1. Housing / jobs are out of balance and houses exceed the increase in viable jobs.
2. Where the proposal leads to any shortfall in any infrastructure
3. The needed infrastructure is not complete before construction.
4. The proposal is on green field land if there are brown field sites available in the vicinity. (Suggested at least a 2 mile radius)

Net FTE jobs increase/decrease figures should also be available for the yearly monitoring to maintain an effective balance. No.3, there should not be any sites brought forward unless FTE jobs increase demands it, this section is promoting unjustified house building and therefore makes the plan unbalanced and unsound. Nowhere does the plan establish the jobs to homes ratio without which gives the Council the means of excess house building, again unsound. FOAN needs cannot be reduced unless sufficient jobs are available and sufficient social/low cost homes are built, at least 30% plus bedroom calculated should be required regardless of quantity of new houses (anything 3 and over)

This whole section of the proposed modifications is seeking reasons to build more houses than necessary without considering job figures, economic growth and viability, which will create an unsound plan when housing further exceeds job and economic growth. With regards to early review trigger point the time is now because housing applications have been granted whilst job creation is negative creating an imbalance (too many houses and negative job growth) .

RMM 8.

4 5 40 replace the words "likely provision of jobs" with "firm factual provision of new viable jobs". Screwfix has opened in Torquay creating 16 jobs and a pub/restaurant is also opening and creating up to 50 new jobs, plus a new Aldi store, but how many of these will be full time and above minimum living wage? Very few probably, and this number of jobs is insufficient to overcome job losses since 2012 and which are continuing to happen. B and Q are warning of job cuts, store closure and even disappearing altogether, major stores are cutting back expansions already the new Morrisons local in Paignton has reduced its opening hours and may yet close, the council alone admit the loss of 350 jobs including senior posts in the last 3 years (Herald Express 24/06/2015 Steve Parrock interview). In the town centres more shops are closing than are opening. There is no justification in continuing to permit new housing growth to continue unless net, FTE, living wage, jobs are created NOW.

The trigger point is only considering increasing the rate of house building and not the reverse making the supposed jobs/homes balance basis unrealistic and unsound especially as the trigger points are all based on needing more homes to be built and no consideration of the reverse.

This section of the plan shows no intention of balancing homes with jobs but merely gives the Council the opportunity to build, build, build regardless of the consequences.

RMM9.

SDP1. The number of houses required are not balanced against the actual FTE, above living wage, and permanent jobs that will be created. Empty shops, empty units, and undeveloped employment land do not create jobs, but only create the possibility of jobs, which does not help locals to buy the houses being built now.

RMM11.

This level of building would still more than double the existing houses in Collaton St. Mary which is contrary to the NPPF as you cannot double the size of the village without altering its village environment and looks. The Masterplan at present does not provide the level of facilities for the village that would prevent it becoming yet another deprived area of Torbay, it would also begin to merge the village with the urban expansion of Paignton.

RMM14.

If there is unused capacity in the car parks it could be the actual cost of parking that is the problem, which in turn leads to shoppers using out of town centre shopping areas which have free parking and remove trade from the dying town centres.

RAM 2.

Growth within infrastructure constraints is virtually zero as road improvements are negated by the severe constriction at Kings Ash Road (particularly the hilly part) and the sewer capacity requires that new larger mains are installed and a separated clean water run off system is installed. There is no allowance for any of these necessary improvements in the plan and therefore positive growth is severely restricted.

RAM 4.

The Councils assessment cannot be relied on, as some sites have not been fully assessed with regards to environmental constraints, flooding, and protected species habitats. Until such time as all sites have been fully assessed their capacity is unsure and therefore the assessment is likely to be unsound.

RAM 5.

As this modification only considers the necessity to increase housing land supply and does not consider the need to decrease or hold back land supply in case of lack of assumed job growth leading to excess of housing, then this part of the plan is unsound.

RAM 10.

The Council has not taken into account the decreasing in migration trend, and provides no hard evidence or reasoning that this trend will be reversed. The projected decrease in household size is not happening because of the lack of well-paid and permanent jobs, the Bay is still suffering more job losses than gains. There is no justification to alter the plan period and it is not clear just exactly what the plan period is, 15 years 19 years or 20 years, all of which have been muted since the release of the proposed plan. Because of these facts the plan is unsound.

RAM 16.

The boundaries marked with dashes do not appear to coincide with the actual growth areas as specified elsewhere. This could cause confusion to both developers and planning committees, which could result in costly and unnecessary appeals and therefore unsound.

RAM 17.

Mitigation measures are not a solution unless they can be proven sustainable, practical, and affordable. As proven by the Churston Golf Club appeal.

RAM 74.

This is not a minor amendment. Both Devonshire Park (former Nortel site) and Jacksons Land were previously allocated as 100% employment land, as they currently stand 50% housing 50% employment. To reduce the employment land on these two sites alone to 25% would effectively harm the potential expected job growth and promote further reductions in employment land and likely job growth on other mixed sites. If employment areas are reduced and therefore job capacity reduced then there is no need for increase in housing. There is also the fact that the application for Jacksons land covers more green field land than the original proposed Jacksons Land and therefore is still outside of the old or new plan's employment/housing growth area and a further unnecessary intrusion into greenfield land.

RAM 129.

To effectively reduce the % of affordable housing is contrary to the Housing Needs of the bays populous and therefore unsound, considering that the Councils own figures show the need for social/affordable housing is 60% and they are only asking for 30% on the largest of sites means that the needs are not being met. All housing sites of 3 and above should provide at least one third of affordable housing based on the number of bedrooms not units of housing in order to help towards meeting the NEEDS.

RAM 169.

The consultants document on the drainage systems stated that the amount of waste water produced by households would need to be reduced by 15%, climate change and Urban Creep would not affect the quantity of run off into the drainage system, and a robust system of extracting existing run off into the combined sewer system is put into place. It also admitted that this was highly unlikely to be achieved. This does not seem to have been fully taken into account. Evidence of this is shown by South West Waters comments on the recent plans for Devonshire Park and Jacksons Land. Without putting into place a system which separates clean and foul water drainage will only cause more overflows of both types (as some residents in Collaton St.Mary have experienced) It should also be noted that the sewer pipework in one area of Collaton St.Mary which has been examined by Exjet has been given a grade of 5 (meaning not repairable and needs imminent replacing)

RAM 178.

Table 7.1 there is no figures for the planned for job creation to compare with the housing numbers completed which is vital to keep the plan a balanced one. By leaving out the jobs/houses comparison the plan becomes purely housing led and disregards any balance making the plan unsound.

RAM 181.

Whilst agreeing to the addition of Hollicombe Head to RIGS, why is Yalberton Valley not also been added particularly with the evidence submitted by the Yalberton Valley Community Forum which includes references to the caves having been used historically by man.

RAM ANNEX 1.

The 2 sites in stage 4 of the Collaton St.Mary Masterplan are in the Councils Amber and Red notation of restricted sites and this fact combined with the so far over supply of housing should be removed from the Masterplan. If this was done it would prevent developers from incurring unnecessary costs on sites which are very unlikely to come forward in the current 20 year proposed plan. The proposed changes to Clennon Valley are also not needed in the totals particularly as they are in or on the edge of a flood plain.

Mr.R.E.Bristow
The Coppins, Totnes Road,
Collaton St.Mary.
TQ4 7PW.

PI1

428525

Pickhaver, David

From: Roger Bristow [REDACTED]
Sent: 30 July 2015 19:34
To: Planning, Strategic; Young, Robert
Subject: RMM's and RAM's
Attachments: Comments on MM.docx

Please find attached my comments on RAM's and RMM's

Pickhaver, David

From: Jane Downing [REDACTED]
Sent: 13 July 2015 09:00
To: Planning, Strategic
Cc: Young, Robert
Subject: Proposed replacement modifications to the submitted Torbay Local Plan

It has been brought to our attention that modifications have been submitted regarding the Torbay local plan.

We are residents of Collaton St Mary which is, as you know, a semi rural area on the outskirts of Paignton..

We have spent many hours studying the council website and reading any published literature regarding planning and have been unable to see any clarity or fully understand the proposals.

We do not consider ourselves to be stupid people and it is apparent that the proposed building of such a large number of dwellings will have a huge impact both locally for us, and for the Bay as a whole.

We consider it far from satisfactory that Torbay council seems to be pushing this ahead with next to no REAL community consultation.

Hiding proposals and subsequent modifications to them in difficult to access areas of council websites is quite simply running rough shod over the idea of localism and community involvement.

We would like to see Torbay council clearly publish their exact proposals via a media that the community would be able to see ie local newspaper.

Torbay council may consider that they have done this in the past but because of the lengthy and complicated planning application and negotiations they simply must publish regular and extremely clear updates so that everybody understands what is being proposed.

We strongly object to the new modifications.

Ben and Jane Downing

Sent from my iPad

Pickhaver, David

From: Adrian Gee [REDACTED]
Sent: 03 August 2015 11:55
To: Planning, Strategic
Subject: PROPOSED REPLACEMENT MODIFICATIONS TO THE SUBMISSION TORBAY LOCAL PLAN.

I would like to comment on the PROPOSED REPLACEMENT MODIFICATIONS TO THE SUBMISSION TORBAY LOCAL PLAN.

I refer to Paignton West and Collaton St. Mary.

Collaton St Mary, owing to its topography and location, is unsuitable for high density housing development as proposed in the Proposed Replacement Modification Submission. Torbay has invested heavily in a new link road. Clearly it is this area of Torbay, with its new infrastructure, that would more economical and better suited to building large scale new development. Totnes Road is Torbay's link road with the City of Plymouth. The extra traffic problems that development at Collaton St Mary would cause at the river Dart Totnes Brutus Bridge has been completely overlooked.

Collaton St Mary should not be grouped together with 'Paignton West'. It is a separate village (even mentioned in the Domesday Book) and, geographically, a Flood Plain area at the top of Yalberton valley, a protected area above the village of Stoke Gabriel in the South Hams. As such it needs a separate and carefully considered approach to any development proposals especially as regards to the flood risks and the village character.

The proposed replacement modification of 460 new homes is a figure quoted as being based upon a recently commissioned Collaton St Mary Masterplan. This figure cannot retain the village character of Collaton St Mary as is required in the Torbay Local Plan Draft. Also, there are no plans available that provide adequate assurance against safety from flooding and sewerage at Collaton St downstream. The people of Collaton St Mary and Surrounding areas have not been consulted sufficiently on any of the proposals. What is most concerning is the source of the proposed numbers. The numbers of homes proposed are deduced from designs in the Council's Collaton St Mary Masterplan. It follows that the Masterplan is playing a major part in the Local Plan. Being a contentious Flood Plain Area and affecting areas downstream in the South Hams it means that the Collaton St Mary Masterplan has to be the subject of careful scrutiny and public and engineering consultation on its soundness and realistic feasibility before any numbers for homes at Collaton St Mary in the Local Plan can be deemed realistic.

Existing homes in Collaton St Mary are built low in the valleys and are surrounded by steeply sloping farmland. Collaton St Mary is an Environment Agency designated Flood Plain Area. Yalberton river flows through the centre of Collaton St Mary South to the Dart making it a perilous place to consider development, especially on this scale. 460 homes will treble the size of Collaton St Mary and would unnecessarily set a precedent for urban sprawl on Torbay's farmland fringes and other villages. Collaton St Mary lies much further West than anywhere Torbay has developed before. It 'protrudes' like a finger close to Torbay's borders. It will allow Torbay freedom to expand housing estate to the very edge of the South Hams. The Neighbourhood Forum, the people of Torbay and the residents of Collaton St Mary do not feel that it is necessary to include land at Collaton St Mary for development in the Emerging Local Plan. It is wrong to 'predict' having to use Collaton St Mary's arable farmland for housing. Clearly, it would be more logical to leave the decision to develop Greenfield land at Collaton St Mary until the next Local Plan and, if deemed necessary, concentrate efforts within this Local Plan to solving the very real flooding, sewerage, infrastructure and village character issues.

My comments on the original Draft Local Plan clearly identify the problems with developing Collaton St Mary. They have now shown to be very real in the presently unscrutinised Collaton St Mary Masterplan.

Trebling the size of a small Devon village is a dramatic and catastrophic change. It is a very difficult challenge indeed to retain the character of Collaton St Mary village, as is required in the Draft Local Plan, and not to swamp it with housing estate. For such an important document, Torbay's Local Plan needs to be sound and achievable. Previously, a comments on the original Draft Plan was that there was no Masterplan for Collaton St Mary. This comment was notable for its integrity. It is wrong that a Collaton Masterplan is not being officially submitted and publicly consulted at this stage. A proper, well thought out, professional Masterplan for Collaton St Mary is required before any numbers can be agreed. It should be fully consulted with the electorate so that it becomes a completely realistic possibility and an exiting and welcome change foe Torbay. Because Collaton St Mary is such a contentious place to develop, if this is not done, and done successfully, then the Council's Local Plan is simply playing with maths and forecasting house numbers in order to keep the Planning Inspector happy.

The latest Proposed Replacement Modification Submission states that a Materplan for Collaton St Mary has been commissioned and underway. The latest modifications of the housing numbers allocated for Collaton St. Mary at 460 are wholly based upon the contents of this draft Masterplan. It is wrong then that the Masterplan is not finished and scrutinised objectively from all aspects for its sustainability and feasibility before Torbay's Local Plan is considered sound. It is the single most important document as regards the feasibility of the proposed housing numbers for Collaton St Mary. Its progress is available for viewing at

www.torbay.gov.uk/index/yourservices/planning/masterplans.htm
www.stridetregon.com/torbaymasterplans

The Masterplan struggles with design and has been a catalyst for reconsidering the housing numbers for Collaton St Mary in the Previous and the Proposed Replacement Modifications.

Ocean BMW garage complex on the Totnes Road is to be converted into a community centre. Collaton already has a large village hall, a church and a local pub and so the Master Plan is simply adding more of the same and wasting building land.

The Flood Meadow area on the Flood Plain is proposed as a recreation area. This area floods and is mainly peat substrate. Much of the winter and during and after rainfall it would not be a pleasant place to be. There is still no clear plan for Flood Defence. There should be an engineering solution to the very real and serious increase to the flooding tendency which will come with any proposed new developments at Collaton St Mary. There are only comments of 'enhanced drainage' and no evidence of suitable, sustainable engineering proposals. Also, there is no evidence of any enhanced infrastructure or engineering solutions to sewerage problems.

The Masterplan's Phase 2 is a poor effort at town planning and community design. In this stage the compulsory purchase of the 1 million pound property on Higher Ridge will be necessary. Essentially, it's the development of Higher Ridge, grade 2 farmed green fields. As its name suggests this is a ridge of land that is higher than the land that surrounds it. At present this field is undertaking a very important role in preventing flooding at Collaton St Mary and beyond. Rising steeply up from the Flood Plain it is acting as a soak away for water coming from the Ridge. It is not sensible to build on steeply rising land adjacent to a flood plain particularly where there is existing housing at flood plain level. It would be common sense to leave soak away land here.

When designing a community housing area, careful attention paid to the impact any proposals might have upon existing local community should preside. This has not been the case. From the Saxon Meadow area of Collaton St Mary, the proposed development will be very oppressive. Proposing a row of buildings along the high point of the Ridge alongside St Mary's Park is socially inconsiderate. Residents of St Mary's Park, Saxon Meadow and Totnes Road have had little involvement in a consultation process. A row of new homes here would be overbearing and intrude drastically upon existing residents lives and privacy beyond good reason. New homes at the south east corner of the proposals would be some 20 foot higher than existing homes. Higher Ridge is surrounded entirely by bungalows. There is nothing proposed that stipulates single

story. An artist's impression avoids showing the steeply rising Higher Ridge but shows double story buildings. This is unacceptably thoughtless design which is shown in deceptively good light with much artistic licence. So, what if these homes are given permission for double, or even treble story? Is it right?

Homes are proposed in a 'dip' or 'bowl' on Blagdon Farm, prime farmland at the top end of the ridge. There are serious flooding issues here as well with no mention of a solution.

Homes are proposed to the west of the school on the north of the A385. There are the issues of traffic and flooding again. But only half of the field to the north of the A385 is shown as developed. This is illogical; this area is perhaps the most suitable area in Collaton St Mary for development. Here there would be very little impact upon existing residents and the land slopes away from the A385 softening any visual impact.

New homes are proposed to the north of the A385 and to the east of the Collaton Church and are serious cause for concern. This part of Collaton St Mary rises very steeply indeed behind the existing homes and it seems unacceptable and intrusive to plan development here. Also, this hillside gives Collaton St Mary its rural character.

Emphasis upon continuous green infrastructure for Collaton St Mary and the 'green spine' concept is commendable. The idea of a Green Gateway from the South Hams is hopeful but not achievable with such a large housing estate. But there is an important area that has consistently been completely overlooked - it's effect upon existing residents. The feelings, thoughts and lives of the local people have all been left unconsidered.

The people of Collaton St Mary who are actually aware of the plans, must regard themselves lucky if you do not live in one of the many homes affected by the looming antisocial proposals. Surely it is inhumane to suggest that, through poor planning and an unsound Local Plan, so many people should have live with the threat of accepting such a catastrophic intrusion into their privacy and daily lives?

It now adds up to 480 new homes. There is no evidence to suggest that they are to be for local people to live in. There is no evidence to sustain the feasibility or safety of this proposed number to be built at Collaton St Mary.

The decision to develop Collaton St Mary is clearly best put on hold until the next Local Plan. If they are deemed needed, there is quite enough more suitable land without Flood Plains elsewhere in Torbay for these 460 homes. It should be held back until a comprehensive Masterplan is produced that satisfies all necessary criteria. It is important to establish solutions and responsibility for the flooding, sewerage and infrastructure, privacy and local opinion issues at Collaton St Mary first before knowing the number of houses that can be built there. At present the inadequate Masterplan shows the preferred schedule. Build 460 first, find solutions to the aftermath misery later. Cheaper, easier, good for the numbers, but not a sensible schedule on a Flood Plain. In Torbay and South Hams, there are many who feel that Collaton St Mary cannot realistically, aesthetically and safely accommodate such high numbers of housing. The submission of a comprehensive, professionally and locally consulted Masterplan is the only solution in order to provide the correct answers. All other numbers are just a dangerous guess to impress.

All good design and planning is conceived and achieved with love, not with fear.

No one I have spoken to loves the development proposals for Collaton St Mary. Those who are indeed aware of it fear it. There has been little or no consultation. The proposals are based upon fear. Fear of not enough land for homes in the future. Fear and avoidance of the Collaton St Mary residents reaction to the proposals. Planning our communities should be based upon love not fear. The residents of the village of Collaton St Mary have to live in fear now of what the planners are proposing to do with their environment in the Emerging Local Plan. People living downstream from Collaton St Mary at Yalberton and Stoke Gabriel fear the flooding too. Residents in Collaton St Mary are likely to have elevated double or treble story housing estates physically casting very real dark shadows on their lives. They live in fear of the looming Government Planning Inspector's decision.

Adrian Gee
BA(Hons) MCSD

Tree House, Hillfield,
Stoke Gabriel, Totnes,
Devon TQ9 6SH

Strategic Planning (sent by email to strategic.planning@torbay.gov.uk)
Torbay Council, Electric House,
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August 2nd, 2015

Submitted Torbay Local Plan - Proposed Replacement Modifications

Dear Strategic Planning Team,

1. With regard to the current consultation on the replacement modifications to the submitted Torbay Local Plan, this response fully endorses the entire submission by Paignton Neighbourhood Forum (PNF), including references therein to PNF's earlier response to the now withdrawn modifications proposed after the Examination in Public and consulted on earlier in 2015.
2. My own response to that earlier consultation remains relevant in regard to the implications of the text added to the 'statement of duty to cooperate' for community consultation that takes seriously objections raised by local communities to aspects of proposed local plans, including to the validity of the evidence base, and also takes seriously community proposals (NPPF 1, 7-10, 17, 155, 158).
3. My response here to the current consultation on proposed Replacement Modifications (RMods) to the submitted Torbay Local Plan (TLP) raises concerns about aspects of this consultation process, including effects of repeated consultations, wording of RMods implying potential need for policies to bypass local communities' priorities as expressed in Neighbourhood Plans, and the status and content of PH19 in the consultation process.
4. Consultation on local plans provides opportunity for local communities to examine the rationale and anticipate the effects of new plans and policies in relation to their experiences of previous and present plans and policies. At the start of the current consultation (22.06.15) eight documents were released for consultation, with a request that each document be commented on separately, somewhat discouraging response. The document referred to above, PH19, appeared ten days later (02.07.15).
5. Repeated proposals for modifications to plan and policies, including revisions of plan and policy rationale that then require updates of 'technical paper' analyses of its underpinning evidence base in government figures, trends and projections, for household size and number, population numbers and age profiles, and migration, that in turn entail repeat public consultation on proposed modifications and their evidence-base and revised rationale, may produce a sort of 'consultation fatigue' especially when coupled with constraints on the forms of response required, potentially precluding responses.
6. Concerns have arisen in relation to ensuring planning is a collective enterprise via meaningful consultation with local communities, that includes rather than excludes people and communities, in accord with NPPF introduction and paragraph 1, so that 'local plans reflect the needs and priorities of their communities'. Concerns have arisen also in regard to PH19's rationale for proposing higher housing numbers than recently downwardly revised figures would seem to support. While original proposals were based on current population and household projections and extrapolated growth trajectories in DCLG and ONS projections now revised downwards, PH19 asserts for a variety of reasons but without adequate supporting evidence that the downwardly revised trend-based figures 'err on the side of pessimism' so do not apply to Torbay's situation or realistic Local Plan ambitions.

7. As PNF's submission notes, PH19's scope and purpose are clear, its status in the consultation stage is not. Its scope seems the assertion of inconsistencies and errors in government population and household figures; its purpose seems the discount of validity and significance in recent downward revision of earlier figures previously presented as part of the evidence base underpinning the proposed plan policy for housing-led recovery.

9. In raising these matters for consideration, my aim is to indicate that to be sound in NPPF terms local plans must reflect and represent the needs and interests of local people in local communities, thus soundness depends on responsiveness to responses of local people within local communities. Responders include statutory consultees and other experts in environment and infrastructure, and local community members and groups with differing degrees of specialist knowledge about aspects of local communities' lives in local environments that could and should influence plans and policies.

10. In the present situation, in which the preparation of Torbay's proposed Local Plan coincides with the preparation of three co-extensive and coterminous Neighbourhood Plans for the same area, the Neighbourhood Forums constitute community groups having considerable original and acquired experience and expertise in planning law frameworks and guidance, sustainable development principles, public consultation, and scrutiny of policy for compliance and conformity with guidance.

11. For local communities an important element in responding to proposed plans and policies is their own experience of the effects of past plans and preceding policies on their lives, including the impacts of development on their daily lives, for example greater facility or difficulty travelling to work or shop or school from improved roads or increased traffic on unimproved roads, to flooding of their local roads, streets and homes with surface water or even sewage during storm events.

12. Statutory consultees provide specialist expertise and advocacy on aspects of local community life, including identifying and indicating possible and probable infrastructural and environmental impacts and implications of plans and policies not readily recognised by non-expert communities, and their comments can indicate areas in which local community experiences of effects and impacts can be translated into acceptable grounds for consent or objection to proposed plans and policies.

13. While responses from statutory consultees and expert bodies and non-technical summaries of aspects of plans inform local communities about potential impacts, positive and negative, a major component of local plans is technical analysis and synthesis of figures, trends and projections for past, present and future changes in population, migration, household size and numbers, employment and economic growth or decline, to be considered in the light of government guidance such as the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).

14. When technical documents forming part of the evidence base supporting local plans and policies might seem to imply that official statistics and government figures on household and population numbers might be seen as unreliable, in-depth analysis of both texts and figures is required in order to understand possible grounds or reasons, coherent and cogent or not, for such implication. The need for informed analysis to meet consultation requirements may deter attempts at such analysis.

15. Where a document released for consultation seems intended to provide and present the rationale for a proposed plan and its underlying strategy and policies, by reference to an evidence-base of official statistics and government figures on households and populations, yet seems to respond to government's recent downward revisions of population and household numbers by questioning the degree to which those figures should or should not be seen as factual and/or reliable, apparently to justify retaining original plans and policies based on previous figures, and despite evidence from communities and consultees that government figures did not and do not support those plans and policies, and suggesting alternatives plans, policies and strategies, consultation and implementation seems not according to the letter and spirit of NPPF (especially 1, 10, 17 [1], 150, 154-6, and 158).

13. PH19 claims that the Local Plan is evidence-based and ambitious but realistic. However, the source, sort, and status of 'the evidence' that 'points to the following conclusions' remains unclear.

a) For example, there is no indication of the specific grounds or reasons on which PH19 asserts that 'the 2012 projections are not significantly lower than the 2011 projections'. Instead PH19 seems to imply that the 'not significantly lower' projections will ensure that 'the Local Plan's figure of about 8900 dwellings *amply* meets the demographically implied provision with *headroom* to meet the Local Plan's strategy for economic expansion'.

b) Similarly no reason is given for the assertion that the existence of 'a wide variety of economic projections [...] shows that no single projection can be relied upon in the absence of a 'policy-on' assessment', nor for regarding a 'useful synthesis of competing evidence' as 'more robust than trend based projections' (referring to PBA's Housing Requirements Report) (extracted from bullet-point 1 of PH19, emphasis mine).

c) The next bullet-point acknowledges that trend-based projections indicate 'a significant ageing population' with health and social care problems, thus 'a need to reverse this trend and attract working age inwards migration or reduce the outwards flow of young people'. The acceptance of this trend-based assessment as robust seems to be seen as grounds for the next bullet point assertion that: 'In summary, the Local Plan is being realistic about housing growth'.

d) In relation to delivering on ambition, the next bullet point asserts that 'based on the above, the Local Plan Target of 5000-5500 jobs is ambitious but realistic [because] it is in line with PBA's analysis [and] represents a positive and sound basis for strategic planning in Torbay'.

e) The next bullet point states that projections do not take account of job-creation measures and link road effects, but are recession-based trend projections that perpetuate Torbay's past poor economic performance. It is unclear how this indictment of trend-based projections is consistent with the second bullet-point acknowledging the realism of trend-based projections indicating a significant ageing population.

f) Much of PH19 seems concerned with discounting DCLG and ONS figures on various grounds: that figures are trend-based or reflect a variety of projections so are insufficiently robust compared to the 'useful synthesis' provided by 'policy-on' assessments; that trend-based figures provide accurate information on population age profile, but reflect and perpetuate past poor performance, due to the post-2008 recession or a decade of pre-2011 decline, which thereby 'bakes-in' to subsequent projections; that figures are actually not wholly trend-based but include assumptions about returns to growth.

g) PH19's proposed resolution of issues identified in it, whether by or within trend-based figures, including a 'top-heavy' ageing population with health and social care problems in an area with insufficient care workers, an inadequate revenue base, an outflow of young people and little inflow of younger-age workers, is not clear, but seems to rest on the hope that current initiatives to increase employment will improve job prospects sufficiently to encourage working-age inward migration. 'While one response would be to plan for decline', the Council's response is to increase jobs above a trend-based 'predict and provide' figure, as well as proposing 1700 dwellings above the household growth rate to provide headroom for job growth.

h) However, while a variety of employment initiatives are operational, little current evidence exists of actual creation of net new full-time-equivalent jobs with wages or salaries adequate to enable retained young people or inflowing younger-age workers to afford to occupy the extra dwellings.

14. Thus TLP's conjectural analysis of influences on ONS/Census figures and DCLG projections seems unsound. PH19 discounts downward-revision of census-based figures on the grounds that the downward revisions reflect either the post-2008 recession or the decade of relative decline pre-2011 so 'err on the side of pessimism', and that 'this is in turn "bakes-in" (*sic*) to subsequent projections TC's position is to put 'trend-based' projections against 'policy-on' assessments, and assert that DCLG also resorts to 'policy-on' assessments even in their supposedly 'trend-based' projections.

15. Local community groups and Neighbourhood Forums have repeatedly responded to public consultations on original and modified aspects of TLP with well-informed analyses and syntheses of government figures, and have indicated alternative growth scenarios which would recognise rather than discount the currently declining population trajectory that has been indicated by several sets of government figures over decades (thus not only the most recent downwardly revised figures which have confirm the accuracy of previous challenges to TLC figures by Neighbourhood Forums.

16. Frequent review of jobs creation linked to downward as well as upward review of housing need would allow flexible phasing of housing proposals flexibly matched to actual jobs created, thereby preventing misuse of resources to bring forward housing in the absence of work, workers or wages.

17. This flexibility would also obviate the need to attempt to bypass Neighbourhood Plans at intra- and/or inter-district level, in order to identify and bring forward sites to provide additional housing, an issues identified in my previous submission to the earlier consultation referred to above, in which one concern among others at that time was the text inserted into the statement of duty to cooperate, which proposed a multi-district non-elected body with regional input to determine appropriate sites to be brought forward, thus providing a means of disregarding and bypassing Neighbourhood Plans despite such plans having equal status with local plans as SPDs.

18. An issue not yet discussed is apparent reappearance and current status of 'predict and provide' strategies, notably in PH19, despite the statement in the TLP synthesis of proposed RMods and submitted local plan that 'the days of predict, provide and hope' are 'long gone' (3.2.9). PH19's statement that TLP seeks a jobs increase above a trend-based 'predict and provide' figure, alongside the comment that trend-based ONS and DCLG projections 'err on the side of pessimism, would indicate that TLP must prefer to be seen as erring on the side of optimism. This policy seems similar or identical to 'predict, provide and hope', in regard to the provision both of dwellings and of jobs that enable younger workers to live in them.

Predict, provide and hope

3.2.9 The days of 'predict, provide and hope' when a local plan simply had to allocate land are long gone. Clearly the Local Plan has to identify both sufficient brownfield and greenfield sites, but it must go further to ensure that jobs and not just housing come forward. Detailed phasing agreements, including s106 Planning Obligations requiring investment into job creation are an important element of this. Local Development Orders will be used alongside financial incentives, for example, to accelerate delivery of employment space and jobs.

19. While ONS/DCLG projections asserted to 'err on the side of pessimism' have been argued to '*bake-in*' that pessimism (or realism, depending on position and perspective, and even on particular bullet-point in PH19) the assumptions and rationale underlying 'project and provide' proposals seem *half-baked*, especially insofar as they focus exclusively on refusing to consider the potential validity of the figures and the real implications of continued decline, with or without planning for it, even while discussing the likely 'unintended consequences' of a fall in working age population due to continued inward migration of retirees and outward migration of young people, such as a shortage of care workers and revenue to support a 'top-heavy' population.

20. The issue is that care workers of any age are unlikely to earn enough to buy or rent housing, even if 'affordable', unless parents or partners are also in work and can subsidise household rent or mortgage. Young people without partners or families tying them to the area are unlikely to be able to afford to form new households without secure full time jobs with appropriate expenses (Osborne's national living wage notwithstanding). Net new jobs with living FTE wages and salaries need to be created for young people who are already here, as well as those yet to be attracted to come. This is even more vital if rumours/urban myths, of housing leasing by urban districts seeking to export their non-working or non-living-waged populations, are supported by evidence.

21. The current public consultation is on the present proposed replacement modifications for the withdrawn previously proposed modifications to the submission version of the Torbay Local Plan (hereafter TLP). Both previous consultations on the proposed TLP, on the original submission version, and on the previously proposed but now withdrawn modifications, produced major changes to the original submission version in response to comment by statutory consultees and the public.

22. Additionally, the TLP Examination in Public in November produced changes to the submission version, resulting in the previously proposed modifications that have been withdrawn in response to comments in the preceding consultation and from the Examination Inspector.

23. While introductions to main and additional replacement modifications and other documents in the current consultation indicates successive stages of proposal, comment, amendment, withdrawal and replacement, the present status of previous responses to previous public consultations in regard to comments on previously proposed modifications to existing documents (such as my comment on the text added to the 'statement of the duty to cooperate' discussed above) is still somewhat unclear.

24. As noted in Paignton Neighbourhood Forum's submission, the preceding consultation on the now withdrawn modification was the first opportunity to respond to the outcomes of exchanges among parties to the Examination in Public (hereafter the Hearing) during and immediately the Hearing.

25. A main issue at the Hearing was whether the submission version plan could be seen as sound, given that Sustainability Appraisal (SA) was asserted to be inadequate in various disparate respects by parties to the Hearing. Specifically, Natural England (NE) regarded TLP SA as insufficiently recognising the potential environmental impacts of Torbay's proposed growth strategy and policies, while developer representatives noted SAs for only middle figures for proposed housing provision and argued that TLP must be found unsound, at first because TLP had overestimated environmental impact and its statutory significance in NPPF terms, allowing too few homes to be built for FOAN, then because TLP had underestimated environmental impact according to a statutory consultee (NE) and so was unsound. In response to the Inspector's requirement, SA of higher housing numbers and excluded sites was undertaken, and additional text was inserted into the statement of the duty to cooperate to confirm cross-boundary commitments to common provision of additional sites.

26. Arguably however, these responses, and the potential provision of policy and process to override Neighbourhood Plans if sufficient sites are not identified in them to meet housing proposals, are based on the misconception that in requiring SA for additional housing provision if proved necessary the Inspector should be understood as actually requiring additional housing and sites themselves. Given NPPF requirements for Local Plan soundness, it seems more likely, and more in keeping with his other requirements in post-hearing exchanges, that the Inspector wanted TLP to determine and decide specific provision figures that could be robustly defended against challenges of many sorts.

27. Local community responses to this and earlier TLP consultations, especially PNF's submissions, identify a variety of effective means of achieving that robust soundness in and for TLP and Torbay.

Leaf Lovejoy

From: Tree House, Hillfield, Stoke Gabriel, Totnes, Devon TQ9 6SH

To: Strategic Planning, Tobay Town Hall, Torquay, Devon.

Date: 22 March 2015

Re: Proposed Main and Additional Modifications to Torbay Local Plan, public consultation

Dear Strategic Planners,

This document represents my response to the public consultation on the various modifications proposed to Torbay Local Plan (TLP), made during and subsequent to EiP public hearings in November 2014. In brief, this response fully endorses all responses by Paignton Neighbourhood Forum (PNF) to TLP and to the present public consultation on the main and additional modifications proposed during and since the hearings in public, especially including the most recent letter from PNF and the appendices to that letter.

It concurs with arguments made in PNF's letter that TLP is not presently sound, insofar as the numbers of new dwellings and proposed locations for development and growth do not adequately and appropriately reflect existing environmental, economic and social conditions and constraints, especially including the substantive infrastructural conditions and constraints, but that TLP is able to be made sound, by revising proposed housing numbers to conform with current ONS /DCLG projections, by reconsidering sites and locations for proposed housing development and employment growth areas accordingly, by recognising that the 'duty to cooperate' entails respecting rather than subverting neighbourhood planning processes, and working with rather than bypassing or overriding local communities' local knowledge and decisions. Without these changes TLP proposals will be unsustainable in NPPF terms, and so will remain unsound.

It also raises inadequate sustainability appraisal of environmental impacts from the 'proposed additional site' on 'land south of White Rock', on the adjoining district South Hams, and on the River Dart estuary, impacts both generally on the landscapes themselves, and on the views from, across and within these designated AONB and AGLV environments, and specifically affecting the South Devon Bat SAC and Greater Horseshoe Bat flyways and sustenance zones, and, through urban creep and increased surface water runoff, increasing already occurring flooding of land, roads and dwellings along Yalberton Stream Valley catchment basin and Galampton Watercourse (now EA-classified as main rivers), that particularly impact the village and environs of Stoke Gabriel (cf 'Summary of Sustainability Appraisal of Proposed Additional Sites with Potential for Development to be included as proposed main modifications to the Local Plan'). The present proposal for this site is as unnecessary and unwarranted as that made in 1997, when a development proposal for this location was refused by the Secretary of State on the grounds that any economic benefits were outweighed by many environmental harms (cf attached copy of decision).

Also raised with concern are potential implications for villages in neighbouring districts of the proposed additional text for the 'Duty to Cooperate Statement', in which adjoining district councils have apparently agreed to establish and run a cross-boundary group 'the South Devon Delivery Review Panel, comprising representatives from the three Councils, infrastructure providers, environmental bodies, businesses[?] representatives and homebuilders, to inform future reviews of the relevant local plan documents', in joint monitoring and review arrangements for further sub-regional housing need assessments, including 'jointly put[ting] mechanisms in place to ensure that, if housing land availability is falling behind market delivery and housing need requirements [...], then further sites will be brought forward to meet housing need requirements through the Local Plan process' (cf proposed additional text for Duty of Cooperation p 2). Where and how further sites might be found to be brought forward is unclear, given site shortfalls and contestation over allocation criteria for housing or employment, development density, infrastructure, etc.

In relation to the proposal for district councils to cooperate in meeting [market delivery and] housing need requirements (however assessed against whatever agreed criteria), reasons for establishing coordinated cross-boundary working include 'in exceptional circumstances, if additional land is required to meet

evidenced housing need, land will be carefully assessed on a cross-boundary basis against appropriate criteria in relevant planning documents', and (in other documents) ensuring that if neighbourhood plans do not identify sufficient sites for local plan requirements, local plan processes are able to allocate them.' Likely effects on community engagement in neighbourhood planning, and by extension the government's localism agenda, if cross-boundary panels are allowed to bring forward further sites that may have been designated for specified other purposes by local communities in Neighbourhood Plans, are not clarified.

As noted in PNF's letter, existing within-boundary panels, notably the Local Plan/Neighbourhood Plan Reference Group, which are appropriate forums for initial address of such issues, have not recently met. Neighbourhood Plans gain substantive weighting as material considerations throughout the consultative process, and once adopted have formal statutory weight equal to that of Local Plans, as intended by and implementing the Government's Localism agenda, thus it is of concern that Torbay and adjoining districts might seem to be promoting extra-boundary representation panels over intra-boundary reference groups, when Neighbourhood Plans represent the local communities' interest and involvement in their own areas. The crucial issue is requirement that councils and consultants be made accountable to local communities.

Objective assessment of an area's needs, and appropriate address of conflicts among those claiming the capacity or capability, or the right or responsibility, for the most objective assessment of an area's needs, are main problems in planning, regarding relative weight of opinions of local people and communities, accountable local councils and/as/or planning authorities, developers, and experts on environmental, ecological and infrastructural issues, including statutory consultees. NPPF 14 notes a 'golden thread' running through plan-making and decision-taking, a 'presumption in favour of sustainable development', that plans and decisions should meet the objectively assessed needs of their area, in regard to the [NPPF] framework taken as a whole, or to specific policies within it, and core planning principles in paragraph 17 state that plans (and so also plan modifications) should empower local people to shape their surroundings.

The NPPF restates the UN definition of sustainable development, notes its three dimensions, gives five guiding principles of UK sustainable development strategy, makes a presumption in favour of sustainable development, and lists twelve core land-use planning principles. The Local Plan must be in accord with the principles of sustainable development as set out in the NPPF, notably paragraphs 1, 2, 7, 8, 9, and 10, which focus on local people and their accountable councils producing plans that reflect the needs and priorities of their communities. If councils and communities differ about proposals and disagree over priorities, the NPPF states that plans should empower local people to shape their surroundings, with joint working and cooperation to address larger than local issues. Neighbourhood planning processes are the means by which priorities of local people and communities are collected and collated for presentation to their accountable councils, then take their place among local plan documents with equal statutory weight.

Thus it is of concern that the expressed priorities of local people and communities in adjoining districts regarding location and sites for proposed development for housing and employment may be subordinated to a potentially unaccountable cross-boundary panel informing and influencing sub-regional bodies, with no indication of how accountability will be ensured beyond stipulated 'assessment against agreed criteria'.

Specific resolution is required of the above issues, as well as those raised by PNF's submissions, in regard to proposed modifications to proposed development locations and duty to cooperate in Torbay Local Plan.

Yours faithfully,

Leaf Lovejoy

Attachments

1997 decision on land south of White Rock

Map of Yalberton Stream Valley catchment and list of existing flood-prone locations (sent to PI 11.2014)

Copy of email from Torbay planners to PI proposing additional text for 'duty to cooperate'

Pickhaver, David

From: Rainbow-Leaf [REDACTED]
Sent: 03 August 2015 08:57
To: Planning, Strategic
Subject: Fw: Response to current consultation on submitted TLP Replacement Mods
Attachments: 19.03.15 Response to public consultation Torbay Local plan proposed mods corrected.pdf; 03.08.2015 response to Torbay Local Plan consultation on replacement modifications.pdf

submission as previous sending corrupted

----- Forwarded Message -----

From: Rainbow-Leaf Lovejoy [REDACTED]
To: David Pickhaver <david.pickhaver@torbay.gov.uk>
Sent: Monday, 3 August 2015, 8:53
Subject: Fw: Response to current consultation on submitted TLP Replacement Mods

Dear David,

Sending you a copy as having terrible trouble with Yahoo, and you'll tell me if you get it - won't you?

Thanks.

Hope you're well.

With best wishes,

Leaf

----- Forwarded Message -----

From: Rainbow-Leaf Lovejoy [REDACTED]
To: Strategic Planning <strategic.planning@torbay.gov.uk>
Sent: Monday, 3 August 2015, 8:49
Subject: Fw: Response to current consultation on submitted TLP Replacement Mods

----- Forwarded Message -----

From: Rainbow-Leaf Lovejoy [REDACTED]
To: "strategic.planning@torbay.gov.uk" <strategic.planning@torbay.gov.uk>
Sent: Monday, 3 August 2015, 8:46
Subject: Response to current consultation on submitted TLP Replacement Mods

Dear Strategic Planning,

Please find attached my response to the current consultation on submitted TLP replacement modifications.

Also please find attached my response to the previous consultation on the now withdrawn modifications.

Thank you.

Leaf Lovejoy

PS Repeat emails due to Yahoo sending without saving new text.

Pickhaver, David

From: Susan Miller [REDACTED]
Sent: 22 July 2015 16:43
To: Planning, Strategic
Subject: Response to updated Torbay Local plan

To Strategic Planning,

- Future housebuilding should be proportional to local needs, keeping the identity and capacity of the area
- Building to supply houses for Exeter and Plymouth will overcrowd this area cause more havoc on local roads and negatively impact tourism, a main income for the Bay
- Large scale housing proposals have not taken into account environmental impact of loss of habitat, nor had the required preliminary environmental impact assessment carried out
- How can this level of development be sensible when the environmental assessment declares the whole of Torbay to be a critical drainage area?
- Building high density housing in such large numbers in an area with few jobs will create a dormitory town, unattractive to visitors, an unbalanced community for residents and detrimental to the Natural environment
- Easy to destroy what Torbay has, resist pressure from corporations remote from here driven by profit, find ways to build appropriately, affordable and sustainably
- Totnes and Dartington housing developments look less dense for example and tucked into small areas that are already built up

Reformulate the plan with input from local groups.

yours sincerely Susan Miller

Pickhaver, David

From: Susan Miller [REDACTED]
Sent: 30 July 2015 22:19
To: Pickhaver, David
Subject: Objection to RMMs

Dear David,

Thank you for your reply to my first e mail.

May I clarify that my objections are to the replacement modifications to the Torbay Plan.

Number 1 The Environmental Capacity of the Area and mismatch of jobs and Homes

Referring to these policies - Policy SS11, RMM5 and RMM 6 and RMM 7, RMM 8 and RAM 4 Paragraph 1.1.8, RAM 5 Para. 1.1.15, RAM 10 Paragraph 2.2.13.

The 8,900-housing development proposals do not match an existing or likely increase in jobs. Pat Steward (Senior Service Manager for Strategic Planning and Implementation at Torbay Council), has verbally admitted at a hearing (and the fact confirmed in print) that there has been no increase in jobs since 2012, and yet many hundreds of houses have since been built, with many more thousands proposed.

I agree with the GRA who recommend that there should be a willingness to make a downward adjustment in housing numbers to accord with population and employment trends and needs within Torbay rather than supplying second homes, and developing Torbay into a dormitory town. Otherwise the unique environmental attractions of the area, which have always been its primary economic asset, will be progressively degraded.

Number 2 Jackson Land (Brixham Road, Yalberton)

Referring to these policies - (SDP 3,4.), RAM 74 Para 5.2.2. 10

Local large-scale housing proposals have failed to take account of the environmental impact of habitat loss, or observe the requirement for preliminary environmental assessment required by Natural England. (which is expensive and time-consuming..). This applies to the proposed development of 192 houses on Jackson Land adjoining the Yalberton Estate, in anticipation of which a copse has already been felled. The possible impact of this development on the endangered horseshoe bat and the curl bunting population, both of whose foraging territory incorporates some of this area, has not been considered. Neither has the lack of obvious access to the proposed development, and how this would be supplied.

Number 3 Coleton St. Mary (RMM Annex 1)

Referring to these policies - Paignton North-Western Area; Policy SDP3, Policies Maps, Sheets 23, 24, 26, 27). Also as regards the area's vulnerability to flooding, with relation to its Foul Water Capacity: Paragraphs 6.5. 3.26). Area judged 'Highly Sensitive' in The Torbay Landscape Character Assessment (SD9 2b).

The plan fails to consider the vulnerability to flooding of proposed development land at Coleton St Mary. This development does not take note of the Environmental Agency assessment, which, in June 2015, designated Torbay a 'Critical Drainage area'. The proposed growth areas in Coleton

St. Mary should now be removed from the Plan. It's designation as 'Future Growth Area' should be changed to 'Countryside Area'

yours sincerely Susan Miller

558519
PI6

'Brooke Vale'

Long Road

Paignton

TQ4 7PQ

By email to: strategic.planning@torbay.gov.uk
Spatial Planning Office,
Torbay Council
Electric House
Castle Circus
Torquay
TQ1 3DR

2 Aug 15

Dear Sir,

**Submitted Torbay Local Plan – Proposed Replacement Modifications
With especial reference to your Replacement 2: Housing Policy Tables**

1. I refer firstly to Planning Application P/2014/0983 - Land South of Yalberton Road, (Yannon's Farm), Paignton and in particular to the letter from South Hams District Council (SHDC) dated the 22 May 2015 and to be found on the Torbay Council Planning website under the 'Documents' tab.

2. Whilst P/2014/0983 relates to an application for a relatively small development within the new 'Paignton North and Western Area', the SHDC letter draws attention to some of the over arching problems involved with over-development in this area. If SHDC express reservations regarding potential development at Yannon's Farm then their concerns will undoubtedly be even greater for the revised housing number of 2250 for Paignton North and Western Area and quoted within SDP3!

3. Some points considered relevant in the letter from Mr David Kenyon, Planning, Economy and Community include:

- *"...The site is within the administrative boundary of Torbay, however due to its location on the A3022 leading into the A385, there is the potential for development in this location to have an impact within the South Hams, particularly on the A385 corridor, the local road network in Totnes and on the village of Stoke Gabriel.*
- *...SHDC has engaged with Torbay Council in the preparation of your emerging local plan through the Duty to Cooperate. Representation was submitted on this plan. SHDC would reiterate comments made on the emerging plan regarding impact on the A385. The A385 corridor, and local road network in Totnes already suffer from problems on congestion and relatively high pollution levels.*
- *...An Air Quality Management Area is declared the length of the A385 in Totnes. SHDC's response to the Torbay Local Plan concentrated on the Collaton St Mary area, although the points raised are equally applicable to this application. In so much that evidence is required to assess the impacts and identify necessary mitigation measures where appropriate related to this development on the road network inside and outside the Torbay boundary, including Totnes and Stoke Gabriel. In addition, further congestion could have a negative impact for*

businesses in and around Totnes, especially during peak times (such as commuting times, Easter and Summer School holidays in particular).

- *...In considering the impacts of the application cross-boundary implications will need to be assessed. It is unclear from a review of the Transport Assessment how cross border implications on the highway network have been assessed.*
- *...From a general ecological/biodiversity matter, SHDC is mindful that your Council is aware of the need to consider implications of the development upon the South Hams SAC and I would simply use this holding response as an opportunity to reinforce this again. In terms of overall landscape and visual impact, presumably any revised proposals will be reflected within a revised LVIA in due course."*

Local residents are already concerned with the current scale of developments in the area and many feel aggrieved that the area is being sacrificed simply for the New Homes Bonus, Council Tax and Business Rate income in order to provide funding streams for Council Services (from Torbay Council press release of 3 Jun 15). The proposed number of dwellings both for Torbay and especially Paignton North and Western Area appears excessive.

Yours sincerely,

Mike Parkes