

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

PROPOSED SUBMISSION PLAN (FEBRUARY 2014)

PROPOSED REPLACEMENT ADDITIONAL 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 – Brixham Peninsula (Galmpton)			
429431	RAM BI1	Boyles	Dr Helen
899233	RAM BI2	Fatz	Jeremy and Tracey
923435	RAM BI3	Seear	Frank
429416	RAM BI4	Sherren	Steve
900020	RAM BI5	Swan	Susan
900047	RAM BI6	Wright	Kevin

Pickhaver, David

From: Helen Boyles [REDACTED]
Sent: 28 July 2015 15:39
To: David.Pickhaver@torbay.gov.uk; Planning, Strategic
Subject: Revised Modifications (RMM and RAM) to Local Plan

75, Stoke Gabriel Road,
 Galmpton, Brixham,
 Devon,
 TQ5 0NQ

24th July 2015

Dear David Pickhaver,

I am writing to express my views on the revised modifications to the local plan published earlier this month. I consider the revised modifications and housing number proposals to be interrelated, and so am considering them in combination.

Firstly, I am thankful that the area South of White Rock, (with its re-designation as Future Growth Area from Area of Great Landscape Value) has been removed from the plan, and that the Golf Club site (1st and 18th holes) has finally been removed, in view of continuing objection and the rejection of the proposal by the Government Planning Inspector.

However, many others of the revised modifications do not seem to me to comply with the tests of soundness (defined in NPPF 182) that a Local Plan should be 'aspirational but realistic' and must also meet the 'Wednesbury test of reasonableness'. The general aspiration to increase employment is positive and reasonable, but the capacity of the area to supply sufficient jobs to justify the 8,900 homes proposed in the plan seems entirely *unrealistic* in view of the limited environmental capacity of the area to accommodate such a scale of development and the absence of any evidence to support the likelihood of the requisite number of jobs being supplied. This scepticism is supported by Pat Steward's own reluctant admission, at a hearing, that there has been no NET increase in jobs in the region since 2012. On this basis, I consider unsound all revised modifications **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.** which are founded on this projected scale of development. Since a commensurate increase in employment opportunities was the only premise stipulated by Keith Holland to justify the proposed scale of development, the planned number of houses should be subject to *downward* (as well as upward) annual adjustment.

Everyone is in favour of the creation or expansion of local businesses but until there is more compelling evidence of these being established in sufficient numbers, the proposed scale of housing cannot be justified, and especially not in environmentally sensitive areas.

I am very concerned, for example, by the proposal for development of *Jackson Land* adjoining the Yalberton Estate (**RAM 74 Para 5.2.2. 10**), much of which South West Water Authorities had considered unsuitable for housing development on the basis of limited Foul Water Capacity. There has also been an inadequate assessment of the impact which the development of this site will have on threatened species such as the Greater Horseshoe Bats and Cirl Bunting populations whose flight paths and foraging areas were clearly mapped on the area (part of the South Hams Special Area of Conservation) by Natural England in June 2010. Access issues also do not appear to have been addressed with relation to this site.

A failure to consider the consequences of inadequate drainage applies equally to the proposed development sites in the much pressured Coleton St. Mary (**RMM Annex 1**), already identified as 'Highly Sensitive' in The Torbay Landscape Character Assessment (**SD9 2b**). The whole of Torbay has in fact been designated a 'Critical Drainage Area' by the Environmental Agency, a fact which is persistently ignored at our peril. Many of the revised modifications, I am afraid continue to show a worrying detachment from the elements of the natural environment on which the stability and sustainability of all built environments entirely depend.

Far from being confident that the much lauded South Devon Highway will vastly increase local jobs, I feel that it is more likely to attract a greater number of second home owners and commuters than to meet the local need anticipated. There is a real danger of Torbay being converted into a dormitory town rather

than made an economically self-sufficient area. There are many opportunities for economic development which would enhance rather than degrade the natural assets that have traditionally attracted visitors (not least the under-exploited Geopark designation!), rather than attempting to reconstruct the area in a way to which it is ill-suited topographically and environmentally.

Regards,

Helen Boyles

Pickhaver, David

From: JEREMY FATZ [REDACTED]
Sent: 30 July 2015 13:26
To: Planning, Strategic
Subject: Amended objections to the Revised Modifications to the Local Plan

Dear Sir

With reference to the objections to the **Revised Modifications** to the Local Plan

It has been brought to my attention that the Strategic Planning Officer seems to be using a failure to cite relevant Revised Mod references on letters of objection as an excuse to discount objections, so I have added them to my previous email. This level of unhelpful bureaucracy to avoid residents concerns just goes further to demine your own position, however for clarity here goes again!

It has been brought to my attention that although the re designation of the land from White Rock to Windy Corner & the Churston Golf Club have been to some extent been stopped that there are still concerns that development of some nature will still go forward in these areas.

Environmental Capacity of Area and mismatch of jobs and Homes

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.

All judged by GRA unsound (See pages 22, 27 and 28 of David Watts' report)).

My wife & I run a medium sized holiday property management & cleaning business. We do lots of work for house builders & developers as well as over 70 4 & 5 star holiday homes. We are acutely aware that the majority of properties built are either second homes or used as holiday lets to generate income, however the majority of second homes in our well informed experience are empty for in excess of 9 months of the year & holiday lets for 6-7 months of the year. This as you can imagine does nothing of any great merit for the other business's of Torbay outside of those months. To say that its to house workers is misleading the general public as its quite easy to see that in the Torbay area there has been no measurable increase of jobs for over 3 years!!! In fact a number of our business owner clients of ours have moved out of this area to places with a more centralised network to the rest of the UK and a better catchment area of prospective staff. They still have their properties and yachts down here that we look after but their contribution to the local economy is almost nil.

(RAM 4 ; Para. 1.1.8 (Environmental Capacity)), which in February of this year, Government Inspector, Keith Holland, had specified could alone justify the proposed housing increases. This has not been, and is unlikely to be forthcoming.

Reviewing our area the majority of its income comes in some form from tourism and the tourists come for our unique and special environment. Mess with that at your peril because once its gone its gone for good! Capitalise on what we've got don't build over everywhere just because that's what other councils are doing. We are different... substantially different, to them, we have things other councils would bite their arms off for. I know its a delicate balancing act but that's why you are there in the office you have been elected to & are paid for out of the public purse to do what the tax paying public in the area want.

Jackson Land (Brixham Road, Yalberton)

(SDP 3,4.), RAM 74 Para 5.2.2. 10 (Judged unsound by GRA)

If you want to get into the nitty gritty with large scale development then you must produce a primary environmental assessment as required by Natural England which you have failed to do on at least one other proposed development near Yalberton. Neither have you taken into consideration the access to this site, which is tantamount to gross stupidity and/or dereliction of care.

Coleton St. Mary (RMM Annex 1)

(Ref. 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).

We still have in our minds the strong impact from the other winter on global warming weather pattern changes and the looming specter of more localised flooding yet you want to put even more concrete & bricks down to exasibate the situation with housing that is not required other than to line developers pockets and those associated with them, please we ask you to take a higher moral ground.

Its hard enough to run a small / medium business down here without the people in charge selling off the crown jewels to the highest bidder. We have a government that are bringing in the Living wage that is simply going to push up prices and drive many business's to go either underground or avoid tax with cash. We have to, whether we need it or not, have a pension system for every business. In our case we set up to employ mums to help them earn around children at school and as such non will work enough hours to qualify yet we have to waste £1000 per business for something nobody is ever going to use! As a small company with low NI contributions if someone is ill for any period of time we now have to fund the Statutory sick pay ourselves (we cant claim it back).

So please please please we have enough to deal with without you guys making it even harder!!! There is no real prospect of more work growing down here (unless you float it off the coast in wind turbines or drilling rigs (yuck), invest in what we do have and advertising what we do have rather than get rich quick schemes.

Yours disgruntled but passionate about this area

Jeremy & Tracey Fatz
Owner of Bubble Cleaning & Bubble Property Management

Galampton Farmhouse
Galampton Farm Close
Galampton
Brixham
Devon
TQ5 0NP

Pickhaver, David

From: Frank [REDACTED]
 Sent: 29 July 2015 23:22
 To: Planning, Strategic
 Subject: Revised Modifications to Local Plan

Dear Sirs

I object to the the above in that the revised modifications contain proposals which remain ill-adapted to the environmental character and capacity of the area. These are:

Point 1

- **Environmental Capacity of Area and mismatch of jobs and Homes**

,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 in no sense match an existing or likely commensurate increase in jobs; in fact quite the reverse. 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

There should be a willingness to make a downward adjustment in housing numbers to accord with population and employment trends and needs **(RAM 5 judged 'unsound in this respect')**

Many of the houses are not fulfilling local need but supplying yet more **second homes** for one of the top ten 'second-home capitals' in the country! With the help of the vastly expanded South Devon Link Road, many houses are proving more attractive to **commuters** than local investors. There is the real danger of Torbay being allowed to develop into a dormitory town serving Exeter and Plymouth, rather than retaining economic self-sufficiency. The likelihood of this is increased as the unique environmental attractions of the area, which have always been its primary economic asset, are being progressively degraded.

The topography and geographical location of the area will always prove a challenge to the establishment of businesses from outside the South West peninsula, even if the main access road were to be multi-carriagewayed to Brixham cliff edge!

I believe that your responsibility to us as home owners, taxpayers and voters is to ensure the sustainable, proportionate development adapted to local need and to the identity and capacity of the area.

It seems to local Forums and Residents Associations that the crucial issue is the clear lack of correlation between housing and jobs, (RAM 4 ; Para. 1.1.8 (Environmental Capacity)), which in February of this year, Government Inspector, Keith Holland, had specified could alone justify the proposed housing increases. This has not been, and is unlikely to be forthcoming. You have a duty to correct this.

Yours faithfully
 Frank Seear
 14 Manor Vale Rd
 TQ5 0PA

Sent from Windows Mail

Pickhaver, David

From: Steve Sherren [REDACTED]
Sent: 28 July 2015 14:26
To: Planning, Strategic
Subject: Objections to the New Revised Local Plan

Dear Sirs,

In response to your recently published Revised Local Plan I attach my objections below.

Objections to the New Revised Local Plan

1. Environmental Capacity of Area and mismatch of jobs and Homes

,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.

Reasons for Objection

The 8,900-housing development proposals in no sense match an existing or likely commensurate increase in jobs; in fact quite the reverse. 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.

We recommend that there should be a willingness to make a downward adjustment in housing numbers to accord with population and employment trends and needs (**RAM 5 judged 'unsound in this respect'.**)

Many of the houses are not fulfilling local need but supplying yet more second homes for one of the top ten 'second-home capitals' in the country! With the help of the vastly expanded South Devon Link Road, many houses are proving more attractive to commuters than local investors. There is the real danger of Torbay being allowed to develop into a dormitory town serving Exeter and Plymouth, rather than retaining economic self-sufficiency. The likelihood of this is increased as the unique environmental attractions of the area, which have always been its primary economic asset, are being progressively degraded.

The topography and geographical location of the area will always prove a challenge to the establishment of businesses from outside the South West peninsula, even if the main access road were to be multi-carriagewayed to Brixham cliff edge!

2. Jackson Land (Brixham Road, Yalberton)

(SDP 3,4.), RAM 74 Para 5.2.2. 10

Reasons for Objection:

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 cirl 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.

3. Coleton St. Mary (RMM Annex 1)

(*Ref. 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).

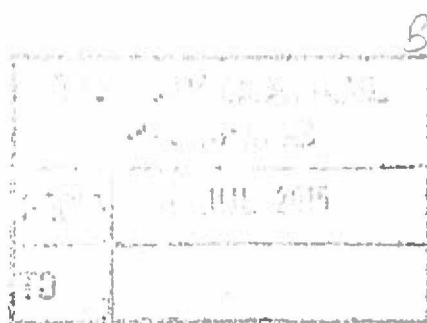
Reasons for Objection

A failure to consider the vulnerability to flooding of proposed development land is demonstrated in the planned developments in the vicinity of the highly pressured Coleton St. Mary. Such development flies in the face of the assessment of the Environmental Agency assessment, which, in June 2015, designated Torbay a 'Critical Drainage area'.

Kindest Regards,

Steve Sherren

Spatial Planning Department
Torbay Council



54 Stoke Gabriel Road
Galmpton
Brixham
TQ5 0NQ
20/07/15

Objections to aspects of The Local Plan.

I am extremely concerned that there is a proposal for an extensive 8,900-housing development. This in no way is suitable for the area and runs counter to common sense in that there are not the job opportunities to match such a huge influx of homes and people. I understand that Pat Stewart has confirmed at one of the hearings that there have been minimal or even no job increases since 2012. Despite which many homes (in the thousands) have been built and thousands more proposed. It cannot be right to cram in more homes for thousands of additional people whose numbers will be reflected in unemployment statistics, for even if they find work they will displace others. In February, Government Inspector Keith Holland stated that a correlation between the proposed housing and available jobs were the single criteria to justify the building of these homes. Because there is no correlation between these two elements, the Plan is wholly undermined and must be reversed.

Referenced to: 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. All judged by GRA unsound

Lots of the houses are not meeting local needs because they are being involved in 'Buy to Let' schemes or purchased as second homes. Another major issue is that the South Devon Link Road between Torquay and Newton Abbot will open up the area for Plymouth and Exeter workers as a dormitory town. This will further destroy the quality of the local environment and impact severely on the area's self sufficiency.

A huge problem is the severe impact on the habitat locally. There is a strong argument against the building of these houses in the destruction of the habitat of the endangered horseshoe bat and the great bunting and an attritional attack of the populations of these creatures. Both of these have territory within the proposed areas.

Referenced to: Jackson Land (Brixham Road, Yalberton) (SDP 3.4), RAM 74 Para 5.2.2. 10 (Judged unsound by GRA) (Ref. Para 5.2.2.10) GRA: Reasons for Objection

An additional problem is the vulnerability of the proposed area to flooding. This cannot be good planning and a reversal needs to be implemented. There needs to be sustainable proportionate development that is adapted to the local needs and in keeping with the identity and capacity of the area.

Referenced: Coleton St. Mary (RMM Annex 1) (Ref. 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).

I would appreciate a confirmation of receipt of my letter.

Thank you.

Susan I. K. Swan



RAM 816 900047

54 Stoke Gabriel Road
Galampton
Brixham
TQ5 0NQ
20/07/15

Spatial Planning Department
Torbay Council

Objections to aspects of The Local Plan.

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* I would appreciate a confirmation of receipt of my letter.

Thank you.

Kevin L. Wright

TORBAY COUNCIL PLANNING	
RECEIVED	20 JUL 2015
TO	