

A Neighbourhood  
Development Plan to 2030  
and beyond

# Paignton Neighbourhood Plan

*for the historic heart of Torbay*

2  
Community  
Involvement &  
Consultation



Submitted  
Plan

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# Part 1: Introduction

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## Why this statement has been produced

1.1 This statement is one of several documents produced by the Paignton Neighbourhood Forum to accompany the proposed Paignton Neighbourhood Development Plan. Details of the other documents are contained in the main Plan document and in the accompanying **Basic Conditions Statement**.

1.2 The purpose of this statement is to comply with Regulation 15(2) of the Neighbourhood Planning (General) Regulations of 2012 that requires the submitted Paignton Neighbourhood Development Plan to be accompanied by a Consultation Statement that:

- contains details of the persons and bodies who were consulted about the proposed Neighbourhood Development Plan;
- explains how they were consulted;
- summarises the main issues and concerns raised by the persons consulted; and
- describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Development Plan.

1.3 In accordance with National Planning Practice Guidance (NPPG), the Forum has discussed and shared early drafts of this statement with the local planning authority (PPG 076). In return, the local planning authority has provided constructive comments on this supporting document in accordance with guidance (PPG 067).

## Statement Structure

1.4 Part 2 first provides summary information about how the Neighbourhood Plan has been prepared from the beginning.

1.5 Part 3 explains the formal pre-submission consultation stage undertaken and how the results have been taken into account.

## What happens next

1.6 The next step involves the Council confirming to the Forum that all of the required documents have been received. The submitted Neighbourhood Plan will then be published by the Council for any representations to be made before it is submitted to an Independent Assessor appointed by the Council in agreement with the Forum.

1.7 The Independent Assessor will consider the submitted Neighbourhood Plan and accompanying documents and any representations that may be received. Subject to the outcome of the assessment by the Independent Assessor, a Referendum will be held of all residents who are registered to vote in Paignton. If more than half of those who vote agree, the Neighbourhood Plan will be Adopted formally as part of the Development Plan for Torbay and used by the Council to make decisions on planning applications and similar proposals.

## Part 2: Producing the draft

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### Forum origin

2.1 Paignton does not have a Parish Council. The decision to produce a Neighbourhood Plan by a Forum came into being in the following way:

- In September 2011, representatives from Torbay Council and the bay-wide network of 16 Community Partnerships agreed to convene a meeting in each town (Torquay, Paignton and Brixham) to explore views on each community producing a Neighbourhood Plan alongside a new Local Plan for Torbay prepared by the Council.
- The inaugural meeting of the Paignton Forum took place in October 2011 at Paignton Library and Information Centre. The invitation to produce a Neighbourhood Plan was received enthusiastically and the decision was made for the Neighbourhood Area to be the boundary of the 5 Paignton Community Partnerships even though not all were functioning at the time (Figure 2.1).
- In accord with the intent of the Localism Act 2011, it was agreed the Forum would be community-led. The meeting elected a Chairman, Vice Chairman and Secretary from the non-council attendees and a Treasurer at a subsequent meeting, each coming from a different part of the Neighbourhood Area as the first step of promoting an integrated approach.
- The Torquay community, also without a Parish Council, agreed to produce a Neighbourhood Plan for Torquay. Brixham Town Council undertook to do the same for the Parish area of Brixham in conjunction with the adjoining Community Partnership area of Churston and Galmpton (Figure 2.1).

2.2 This informal beginning established full support for 100% coverage of the combined Torbay Unitary Authority area of 132,000 residents (Figure 2.1). At Government level the initiative has been recognised by the Department for Communities and Local Government (hereafter referred to as **DCLG**) and each Forum identified as a 'Front Runner'.

### Working arrangements adopted

2.3 Each Forum has developed working arrangements to meet geographical differences and community wishes. To maximise a successful outcome at Referendum stage the Paignton Forum adopted the following:-

- **inclusive** – registered membership of the Forum open to a wider range of community participants than required by the Regulations (Figure 2.2); meetings rotated through the geographical area at the outset; following experimentation, all decision making through monthly meetings open to the Forum membership as a whole rather than by separate Steering Group; a registered Forum membership that has remained steady in number at nearly 400 (well above the minimum of 21 required) and covering all parts of the Neighbourhood Area and with membership group representatives having their own membership measured in thousands (Fig. 2.2);
- **transparent** – all Forum decision making held in public (as meeting-in-public) with external observers encouraged to attend from neighbouring

areas but without voting rights; over 80% of registered members receive the monthly meeting papers by email in accord with their registered preference and are able to attend in person or use electronic contact at any time;

- **accessible** – all meeting documents are published in advance and held permanently on the Forum's sponsored website, with more than 29,000 'hits' to date; <http://www.paigntonneighbourhoodplan.org.uk/>
- **task and finish sub-group working** – enabling maximum input from Forum volunteers on different tasks at different times;
- **cross boundary working** – through a 'Reference Group' of representatives from each Forum and the Council to enable matters of mutual importance to be raised and addressed.

2.4 In addition the Forum Constitution drawn up in conjunction with, and approved by, the Council includes:

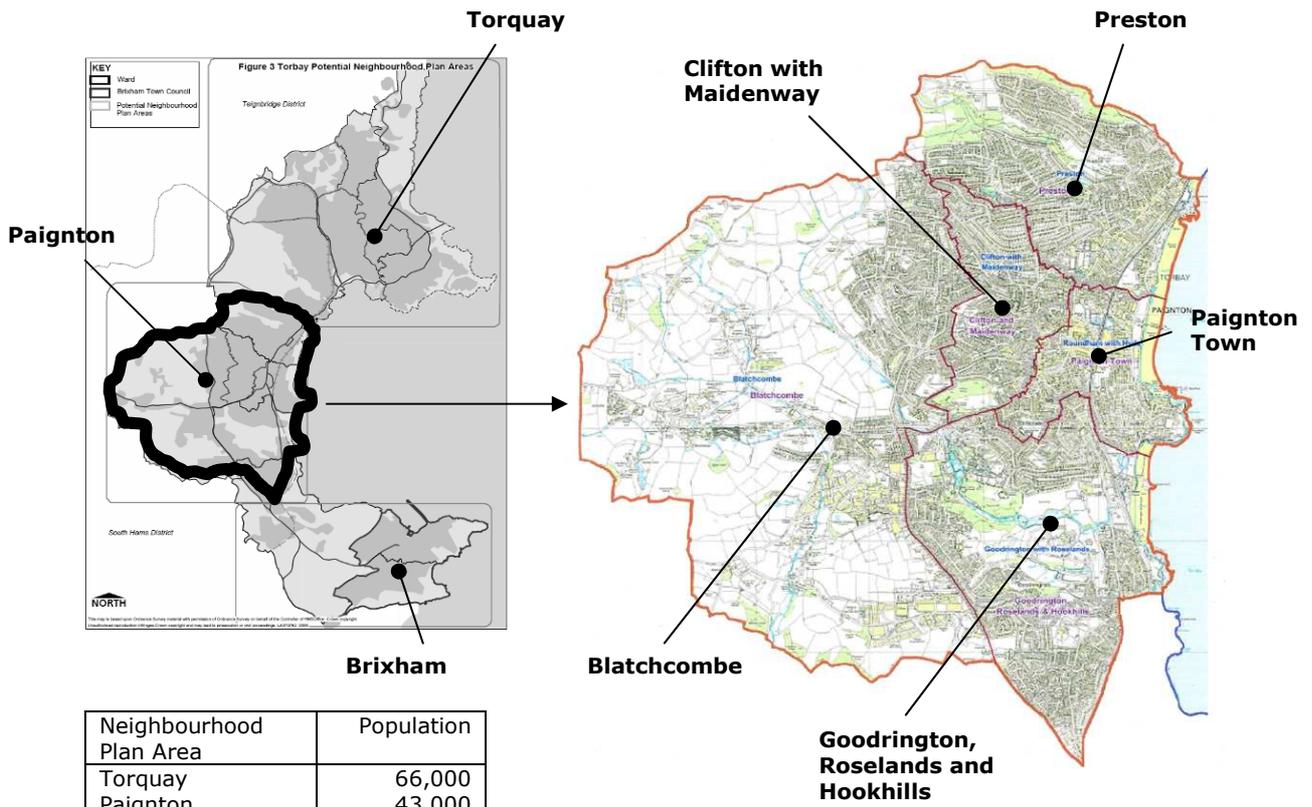
- **non-political** - the Forum is not affiliated to any political party or any other organisation (Constitution para. 9.1);
- **planning applications** – enabling comment [to the Council] on planning applications or proposals that could reasonably be expected to impact upon the objectives of the [Neighbourhood] Plan (Constitution para. 9.2);
- **conflict resolution** - giving primacy to the new Local Plan prepared by the Council unless it is found in preparing the (Neighbourhood) Plan there is doubt any policy or proposal in the new Local Plan is credible, justifiable or achievable (Constitution para. 12.1).

2.5 To give focus to the process the Forum produced and has worked to an Outline Project Plan which has involved three stages to ensure that the resultant Neighbourhood Plan truly reflects the views of the community as intended by the Localism Act of 2011:

- **Stage 1** – involved collecting the views of the community about the Neighbourhood Area **before** any proposals were drafted;
- **Stage 2** – took the results of Stage 1 and converted these into proposals for the key areas where the community wish to see change take place;
- **Stage 3** – (the current stage) has involved bringing proposals together for the whole area for community comment before the Plan is formally submitted and assessed and put to a vote in a Referendum of registered electors in Paignton.

2.6 The information that follows (para. 2.12 onward) sets out these stages in more detail.

**Figure 2.1 – Neighbourhood Plan and Community Partnership Areas**



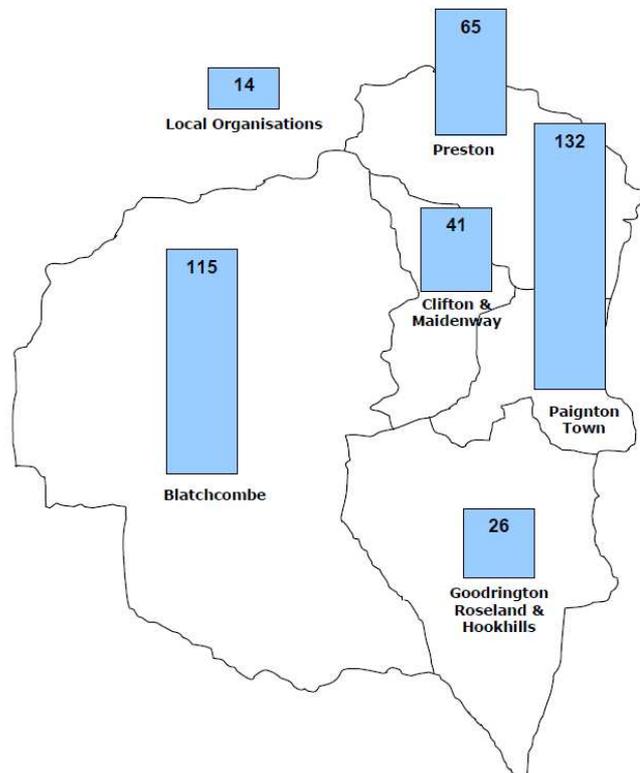
Source: Torbay Key Stats 2008 & Census 2011 (Rounded)

**Figure 2.2 – Forum Membership**

**Constitution (5.1):-**  
 Membership of the Forum is open to individuals:-

- (a) who live in the Neighbourhood Area\*
- (b) who work in the Neighbourhood Area\*
- (c) who are Torbay Councillors in the Neighbourhood Area\*
- (d) who own property in the Neighbourhood Area
- (e) who are retailers in the Neighbourhood Area
- (f) who represent local organisations operating in the Neighbourhood Area

\* All required categories are represented and exceed the minimum requirement.



## **Twin tracking with the Local Plan and adjoining Neighbourhood Plans**

2.7 Prior to the decision in 2011 to produce Neighbourhood Plans (paras. 2.1 to 2.2 above), the replacement Local Plan underway at the time was going to be a 'Core Strategy' under previous Local Plan making requirements, with details later in separate Development Plan Documents. The need to produce a more complete new style Local Plan arose from the changed requirements of the new National Planning Policy Framework and Local Plan Regulations of 2012.

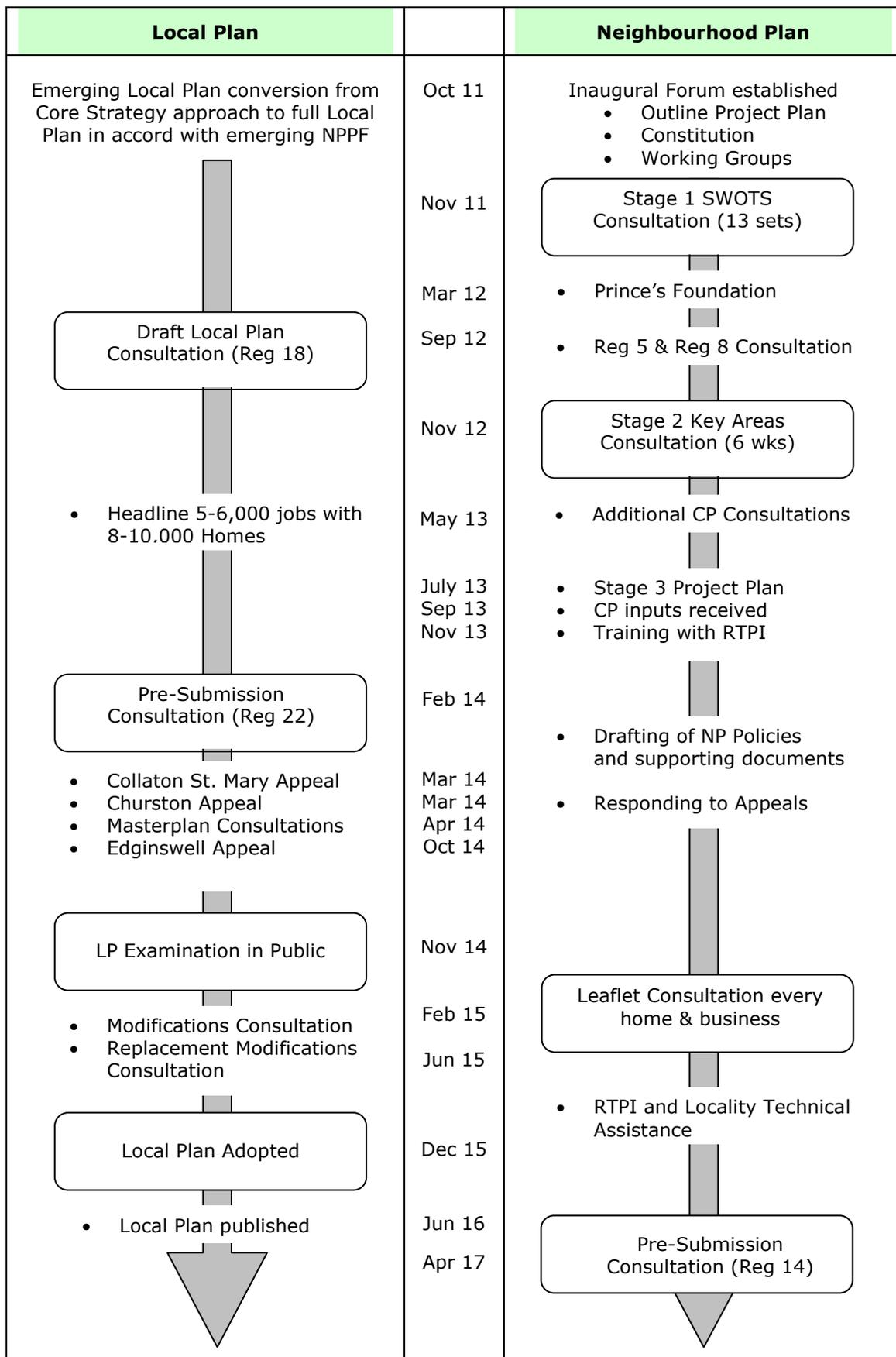
2.8 The twin track approach between production of the Local Plan and Neighbourhood Plans became more challenging than originally anticipated for two key reasons:

- i) Not all information required for the Local Plan to proceed was available; in particular up to date 'objectively assessed need' information and Habitat Regulation Assessment of sites identified by the Local Plan. This eventually led to a major delay in progress of the Local Plan. Following a 6 week consultation in February 2014, the Local Plan was submitted to the Secretary of State in July 2014; a Hearing commenced in November 2014 but was adjourned after three days to a prolonged period of written information exchange. Formal Modifications were published by the Council in February 2015 and Replacement Modifications in June 2015. Each involved a formal consultation period prior to publication of the Inspector's Final Report in October 2015. The Local Plan was formally 'Adopted' by the Council in December 2015 and the final version published in June 2016.
- ii) Alongside this critical period, three major Appeals against planning application decisions were lodged that had a direct impact on the emerging Local Plan and Neighbourhood Plans.
  - A major retail store on the edge of Torquay which included the Council calling into question the assumed future growth of population and availability of spending power that would result. The Appeal was dismissed (Ref P/2013/0677 & APP/X1165/A/14/2215950).
  - A major housing scheme at Churston (Brixham Neighbourhood Plan area) that called into question the ability to approve a habitat mitigation plan if it could not be demonstrated that it was deliverable. The Appeal was dismissed (Ref P/2013/0019 & APP/X1165/A/13/2205208).
  - A major greenfield site proposal for residential development at Collaton St. Mary (Paignton Neighbourhood Plan area) which included unresolved objections to the impact on protected habitat of European importance and lack of a sewerage infrastructure solution. The Appeal was withdrawn (Ref P/2013/ 0572 & APP/X1165A/14/2214154).

2.9 Despite these setbacks work continued on producing the Neighbourhood Plans alongside the Local Plan with each informing the other as they progressed. This approach proved to be beneficial to both as many more responses were received to consultations undertaken as part of the Neighbourhood Plan than in response to the Local Plan consultation periods.

2.10 The collective effect on the overall timetable is shown in Fig. 2.3.

**Figure 2.3 Key Timelines Summary since 2011**



## External help received

2.11 In addition to financial help from DCLG (£20,000 as a 'Front Runner'), and from Torbay Council (£3,000), the following support has been received by the Forum:

- **Prince's Foundation** – provided assistance to the Council and Forum jointly in the early stages of reviewing housing site and design issues in key parts of the Neighbourhood Area;
- **Royal Town Planning Institute** – gave grant funded assistance to the Forum on planning policy construction through a training session to the Forum and a peer review of the emerging draft;
- **Locality** – provided grant funded assistance that enabled information about the emerging Neighbourhood Plan to be distributed to every household and business in the Neighbourhood Area (24,000 properties) referred to in more detail below. Additionally, grant funded assistance and help has been provided on the voluntary **Sustainability Appraisal and Habitat Regulation Assessment Screening Report** that accompanies the Neighbourhood Plan as a separate document.

## Stage 1 – SWOT approach and results

2.12 From the beginning in 2011, the Forum adopted the approach that later became published advice to all Neighbourhood Plan making nationally<sup>(1)</sup>:

*"The most important stage of community engagement is at the beginning. This should be undertaken before the plan's vision and aims are developed; the purpose is to identify key issues and themes and to inform the vision and aims. Care should be taken to ask open questions and avoid 'loading' the process. Simple questions may be asked, like:*

- *what is good about the area?*
- *what is bad about the area?*
- *what makes a neighbourhood good to live and work in?*
- *what pressures affect the area now or in the future?*
- *what needs to change?"*<sup>(1)</sup>

2.13 From November 2011 to July 2012 meetings were held across the whole of the Neighbourhood Area to identify Paignton's "**S**trengths, **W**eaknesses, **O**pportunities, and **T**hreats" (SWOTs).

2.14 These "SWOT" results are very important for two main reasons. First, they helped identify views about the area **before** any proposals were made. Second, they helped show where there is a shared view in different parts of the community. The diagram below (**Fig. 2.4**) shows where the SWOTs have been produced.

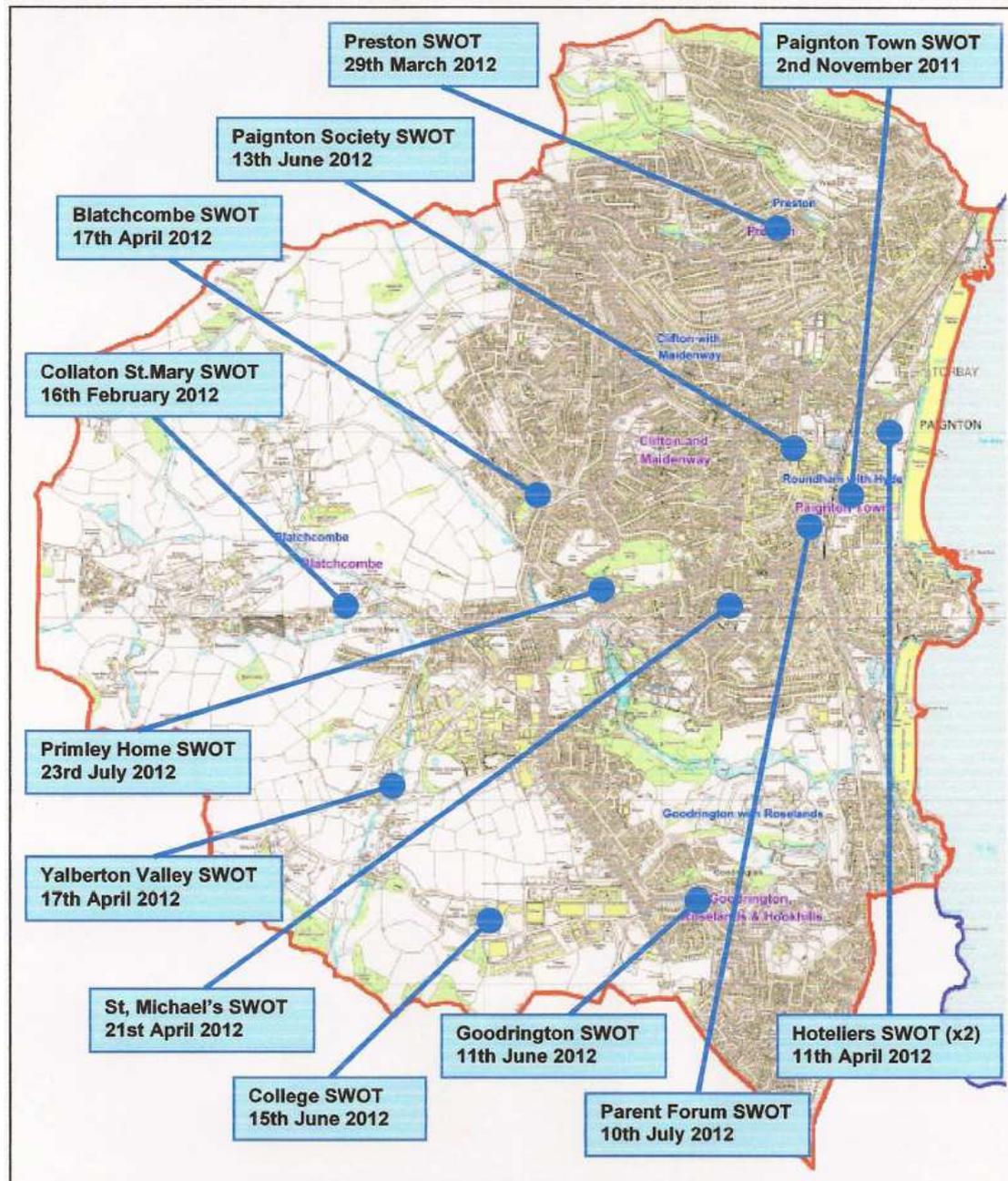
2.15 The response was much greater than anticipated. Instead of one SWOT from each of the 5 Community Partnership areas, a total of 13 were received involving approximately 400 residents and organisations from across the whole

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<sup>(1)</sup> Neighbourhood Plans Road Map Guide 2013 by 'Locality' (pages 26-32)

area and a wide range of ages and interests. Full details of the results of all 13 Neighbourhood SWOT's are available to view on the Forum's website for each date shown. To ensure the quality of information collected, no results were published until after Stage 1 was closed by the Forum on 1st August 2012.

**Figure 2.4 Location of Stage 1 SWOTs completed**



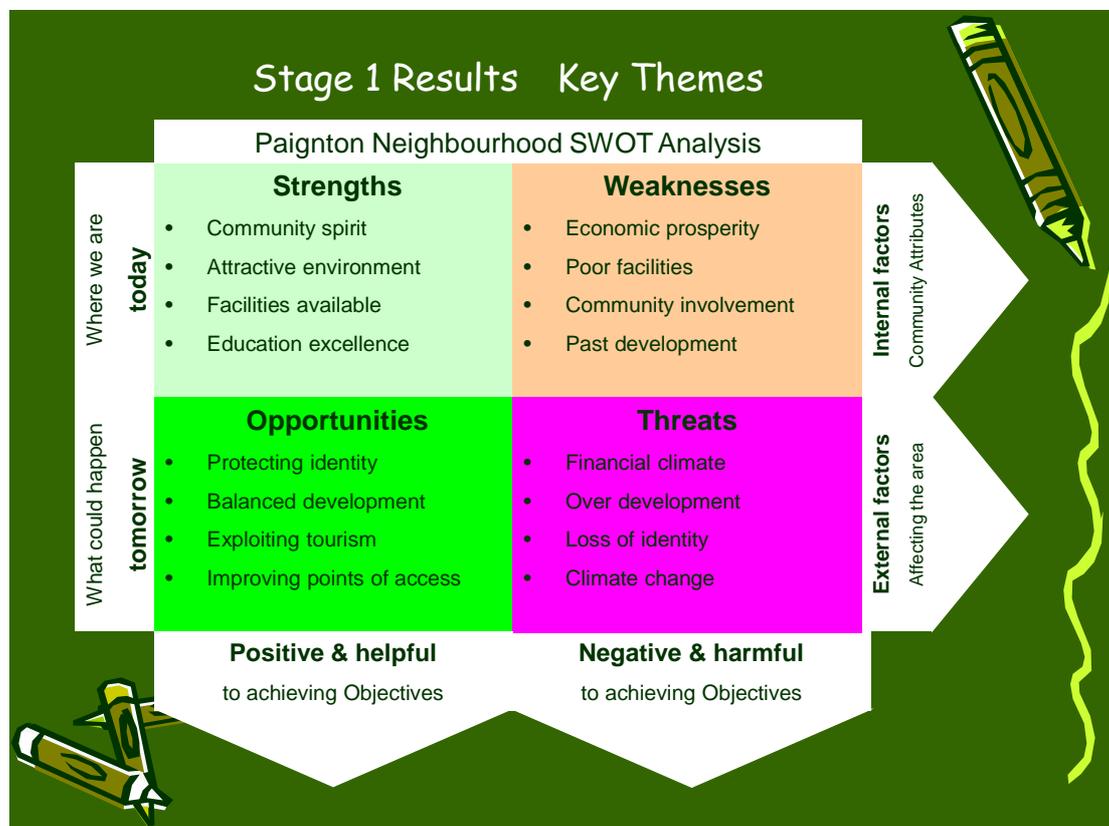
View each at [http://www.paigntonneighbourhoodplan.org.uk/?page\\_id=371](http://www.paigntonneighbourhoodplan.org.uk/?page_id=371)

- **Paignton Town Community Partnership** - completed the pilot SWOT very successfully for the town centre area on [2nd November 2011](#)
- **Collaton St. Mary Residents Association** - completed a SWOT for the village area on [16th February 2012](#)
- **Preston Community Partnership** - completed a SWOT on [29th March 2012](#)

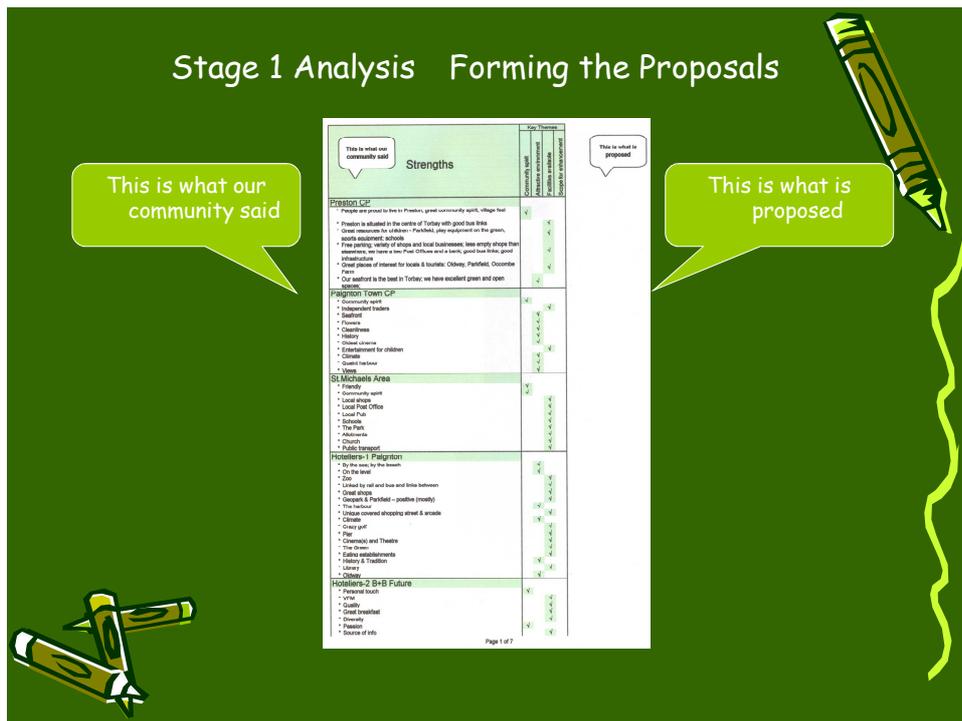
- **Hoteliers in Paignton** completed 2 SWOTS - One related to Paignton overall, and the other on tourism aspects. Both were completed on [11th April 2012](#)
- **Blatchcombe Community Partnership** - completed a SWOT for their area on [17th April 2012](#)
- **St.Michael's Residents Association** - added their SWOT on [21st April 2012](#)
- **Yalberton Valley Forum** - also added their SWOT on [24th April 2012](#)
- **Goodrington, Roselands and Hookhills Community Partnership** - completed theirs on [11th June 2012](#)
- **Paignton Heritage Society** - completed a SWOT on the Character of Paignton Town Centre on [13th June 2012](#)
- **South Devon College** – completed a SWOT on the views of our younger generation on [15th June 2012](#)
- **Torbay Parent Participation Forum** - completed a SWOT involving children with a disability or additional need on [10th July 2012](#)
- **Primley House Residential Home** - gave views from our older generation in a SWOT on [23rd July 2012](#)

2.16 As the next step, volunteers cross referenced all 13 sets of SWOTs received and the analysis identified a number of Key Themes (Fig. 2.5). The results were endorsed by the Forum and used to draft the main Aims & Objectives and development of Proposals for Stage 2 of community participation (Fig. 2.6).

**Figure 2.5 Stage 1 Results: Key Themes identified**



**Figure 2.6 Stage 1 Analysis: Forming the proposals**



2.17 From the detailed results received, the Forum also concentrated further discussion on the Town Centre & Seafront and Western side of Paignton as the key areas where the community wished to see change. The analysis took into account all comments on each of the SWOT headings in each of the 13 sets (Fig. 2.6 example).

### Stage 2 – Key Area proposals validation

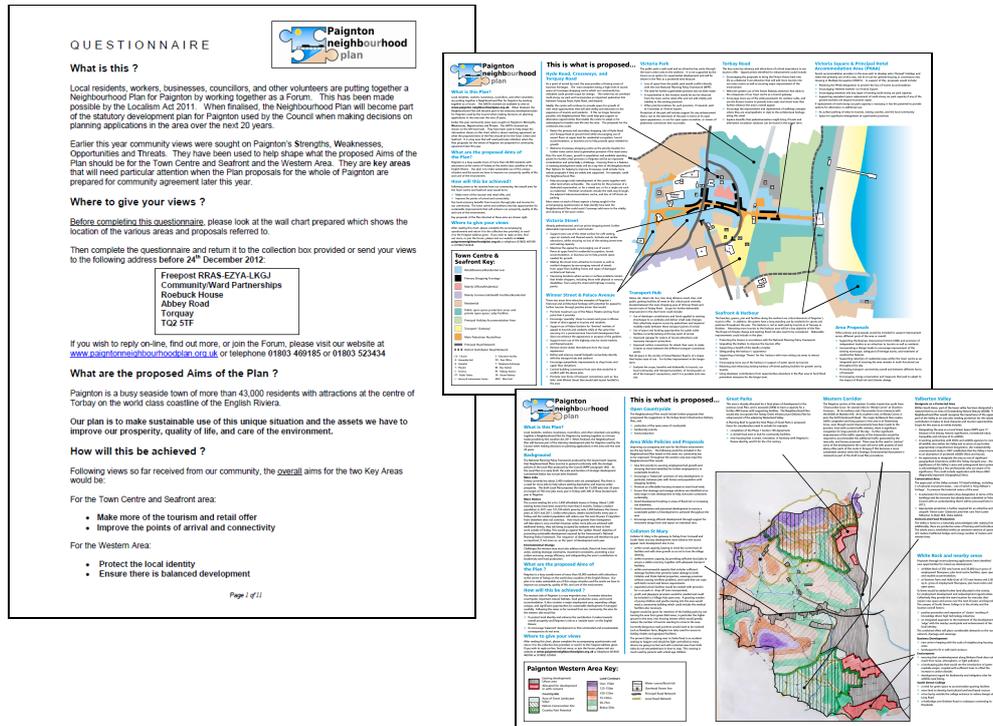
2.18 As the next step, community views were sought on the proposed Aims and Objectives for the Neighbourhood Plan and broad proposals for the two key areas (Town Centre & Seafront and Western Area) based on the Stage 1 results.

2.19 The consultation took place over a 6 week period (12 November 2012 until 24 December 2012). Volunteers were available to attend meetings to explain the proposals so far produced and a number of displays were arranged. Although an informal consultation, this step provided the opportunity to see if the initial Stage 1 results were reliable. It also presented the opportunity to use different methods of involvement to those so far employed. These included:

- An 11 page Questionnaire able to be completed on-line or returned by Freepost in hard copy constructed in conjunction with Council officers (Fig. 2.7);
- Display of two large wall charts showing proposals for the Town Centre & Seafront and Western Area based on community views from Stage 1 (Fig. 2.7);
- Exhibitions held at the Library and Information Centre, South Devon College, Collaton St. Mary Parish Rooms and ASDA supermarket at Yalberton;

- Public meetings and 'workshops' in parallel with Local Plan events facilitated in partnership with the Council and Prince's Foundation;
- Hand delivered Questionnaires to every commercial premises in the town centre retail area and a Forum presentation to retailers and businesses of the Paignton Business Improvement District (BID).

**Figure 2.7 Stage 2 Proposals and Questionnaire**



Available to view at

[http://www.paigntonneighbourhoodplan.org.uk/?page\\_id=709](http://www.paigntonneighbourhoodplan.org.uk/?page_id=709)

2.20 Following completion of the 6 week consultation, all 5 Community Partnerships in Paignton offered to carry out further community consultation during the summer months of 2013. This included:

- An exhibition in a vacant shop for 6 weeks in the Town Centre with volunteers in attendance throughout (Fig. 2.8);
- An exhibition at the Preston Green 'Picnic day';
- Dedicated events in 'planning for real' style meetings of the Blatchcombe and Goodrington, Roselands and Hookhills Partnerships;
- A leaflet drop and public meeting in Clifton with Maidenway.

2.21 The results were presented to the Forum by each Partnership in September 2013. This increased still further the number of overall responses received. The views expressed by the community were very similar to those obtained from the Stage 2 Questionnaire consultation.

**Figure 2.8 Exhibition Shop and 'drop-in' at Crossways (Paignton Town Community Partnership)**



### Stage 3 – Emerging summary to all households and businesses

2.22 In view of Local Plan delay (para. 2.8 and Fig. 2.3 above), the Forum obtained Government grant aid that enabled a leaflet to be distributed to every home and business in the Neighbourhood Area (24,000 premises distributed) to summarise the main proposals, where to obtain more information, and inviting a response if it was felt the proposals should be added to or changed (Figure 2.9).

2.23 The Leaflet was delivered by Royal Mail in the week of 2 February 2015. Of 24,000 premises distributed, 15 responses were received, all were in support.

**Figure 2.9 Stage 3 Summary Leaflet**



Available to view at  
[http://www.paigntonneighbourhoodplan.org.uk/PDF/Documents/2015-02-02%20Leaflet-Web%20\(Final\).pdf](http://www.paigntonneighbourhoodplan.org.uk/PDF/Documents/2015-02-02%20Leaflet-Web%20(Final).pdf)

## Part 3: Pre-submission consultation results

3.1 This part of the document describes the 6 week Pre-Submission consultation undertaken in accordance with Regulation 14 and the results obtained. For ease of reference the Regulation and associated Schedule are shown in **Appendix 2**. In accordance with Regulation 15(2), the information required is set out below in the following order:

- a) contains details of the persons and bodies who were consulted about the proposed Neighbourhood Plan;
- b) explains how they were consulted;
- c) summarises the main issues and concerns raised by the persons consulted; and
- d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

### a) Persons and bodies consulted

3.2 The consultation commenced formally at 9am on Wednesday 19 April 2017 and ended at 5pm on Wednesday 31 May 2017. The proposed Neighbourhood Plan and all accompanying documents were available to view online three days before and have remained archived online for record purposes.



**Figure 3.1 Victoria Street and Collaton St. Mary 'drop-in' events**

3.3 The number and range of persons and bodies notified was extensive. This was achieved by three bodies working closely together as summarized below under the following sub-headings:

- i) The Forum
- ii) Torbay Council (as local planning authority)
- iii) Torbay Community Development Trust (based in Torquay)

3.4 The consultation approach adopted incorporated advance letters, emails, notices and posters, followed by ongoing events and media coverage, followed by 'reminders' sent out towards the end of the consultation period. Further details are given below:

i) **By the Forum:**

- **Letters** - were sent via first class post in advance of the consultation start date to all 71 private owners of proposed Local Green Space designated sites, giving full details and requesting any views. Ownerships were identified in conjunction with Council officers from Land Register information. In addition, 78 members and observers of the Forum were notified by first class post that did not have a registered email address, to ensure they were aware of the consultation and where documents were available for inspection and response (see **Appendix 3**).
- **Email** - consultations were sent in advance directly from the Forum to all 8 public authorities and Neighbourhood Plan Forums adjoining the area, all 3 statutory SEA bodies (Environment Agency, Historic England and Natural England) and 3 bodies that in the Forum's view could be directly affected by proposals. All 14, in alphabetical order, were:
  - Berry Pomeroy Parish Council
  - British Telecom Chief Executive (Crossways proposal)
  - Brixham Peninsular Neighbourhood Plan Forum
  - Dartmouth Steam Railway (Station Square proposal)
  - Devon County Council
  - Environment Agency
  - Historic England
  - Marldon Parish Council and Neighbourhood Plan Forum
  - Natural England
  - Network Rail (Station Square proposal)
  - South Hams District Council
  - Stoke Gabriel Parish Council and Neighbourhood Plan Forum
  - Torbay Council
  - Torquay Neighbourhood Plan Forum
- **Posters** - were placed in a variety of prominent and geographically spread locations within the neighbourhood area in advance of, and maintained during, the consultation. These included (not exclusively) major out of centre supermarkets, public notice boards in Preston and Collaton St Mary, Goodrington Post Office, Hookhills Community Centre, Foxhole Community Centre, Crafty Fox Café and hub, Great Parks Community Centre, Queens Park Rugby Club, town centre retail outlets, the tourist information shop, Centre Peace Shop and Café, local launderette facilities and florists (see **Appendix 4**).
- **Public Notice** - was placed in the weekly newspaper circulating within Torbay and beyond (Herald Express). This marked formal start of the consultation period and gave further details as required (see **Appendix 5**).
- **Online access** - was provided 24 hours a day 7 days a week to all documents for inspection on the Forum's dedicated website, together with a Response Form that could be completed online or downloaded and returned in hardcopy by a variety of ways. The website went 'live' three days before the consultation started to ensure it was functioning fully (available to view at <http://www.paigntonneighbourhoodplan.org.uk/>).
- **Hard copy access** - to all consultation documents, response forms and summary information details was provided for inspection throughout the

consultation period at three accessible and well used locations within the Neighbourhood Plan area and at all 18 events listed later below:

- Paignton Library and Information Centre within the town centre
- Torbay Leisure Centre at Clennon Valley within the Goodrington Roselands and Hookhills area
- Occombe Farm Coffee shop within the Preston area



**Figure 3.2 Hard Copy sets in distinctive red boxes**

- **18 drop-in events** - were attended by Forum volunteers within the Neighbourhood Plan area during the overall period to draw attention to the consultation. This resulted in just under 2,000 individuals being given further details and Response Form in person. The list and location of events is shown in **Appendix 6** and **Appendix 7**.
- **Press articles** - were published in the weekly newspaper (Herald Express) and its online version during the consultation period to maintain the call for consultation response. The online version also included further links to a variety of social media communication routes (see **Appendix 8**).
- **Local radio stations** - were provided with details for broadcast to prompt response forms being returned (BBC Radio Devon and Riviera FM Community Radio).
- **Associated web sites** – of Paignton Heritage Society and Paignton Methodist Churches drew attention to the consultation and where to inspect the set of documents and how to send a response.

3.5 In accordance with Regulation 14(c) a copy was provided to the local planning authority in hard copy as requested.

3.6 The Trades Union Council representative member of the Forum confirmed that all Trade Unions had been notified of the consultation and where details were available to inspect and make comment.

**ii) By Torbay Council:**

- **In parallel** - the Council consulted by email on the Forum's behalf a total of 232 organisations and 46 individuals comprising:
  - 41 public bodies
  - 52 community groups
  - 139 companies
  - 46 individuals (names redacted for data protection)

This method was chosen to ensure the most comprehensive and accurate local planning authority database of addresses was used. A letter from the Forum accompanied the consultation giving each consultee full details required. The list included as a precautionary measure the full range of consultation bodies referred to in paragraph 1 of Schedule 1 to Regulation 14(b) (see **List 1 of Appendix 9**).

**iii) By Torbay Community Development Trust:**

- **In conjunction** - with the Forum and Torbay Council, the Trust (based in Torquay), consulted by email on the Forum's behalf a total of 212 community groups using their most comprehensive and up to date database. These included all known community groups operating within and adjoining the Neighbourhood Plan Area to complement the consultations undertaken by the Forum and Torbay Council (see **List 2 of Appendix 9**).
- **In addition** - notification from the Trust went out to the following interested parties who previously requested regular updates from the Trust on community matters (see **Appendix 9**):
  - 16 businesses
  - 38 independent care organisations
  - 11 doctor's surgeries
  - 15 educational establishments
  - 61 members of staff of statutory organisations
  - 3 volunteer groups from outside Torbay
  - 2 national funders
  - The Herald Express and
  - 247 individuals.

3.7 At the Forum's request, 'reminders' were also sent out by the Council and Trust to all persons and groups in the second half of the consultation period to prompt a response being made.

**b) How consulted**

3.8 Because of extensive consultation undertaken by the Forum during earlier stages of producing the Neighbourhood Plan (see Part 2 of this document), it was possible to simplify the Regulation 14 consultation to 5 main questions.

3.9 A draft of the Response Form and questions proposed was agreed with the Council as local planning authority. This included where assistance with completing the form could be obtained, how to join the Forum and confirming that personal details would be protected. Alongside the hard copy Response Form, the online version was provided on the Forum's website with the assistance of an electronic link to the Council's automated consultation system. The 5 questions were:

**Q1 Do you support the draft plan proposed ?** – with an accompanying request to state the reason for the answer given.

**Q2 Are there changes you wish to see made to the plan ?** – with an accompanying request to state the change sought.

**Q3 Which document cover colour do you prefer ?** – as the view within the Forum on this matter had been evenly split between blue for our coastal waters, or green for our rolling countryside of tourist importance.

**Q4 Are you on the electoral role for the Paignton area so that you are able to vote on the Plan when it goes to Referendum ?** – which assisted the Forum to judge if the outcome of the Referendum stage was likely to be positive.

**Q5 Which age group do you belong to ?** – in order to assist comparison with the previous consultation stages undertaken shown in Appendix 1 in particular.

3.10 All 6 documents proposed for inclusion in final Submission of the Neighbourhood Plan were made available for comment:

- The Neighbourhood Plan
- Basic Conditions Statement
- Community Involvement and Consultation (this document)
- Supporting Evidence
- Sustainability Appraisal & Habitat Regulations Screening
- Sustainability Appraisal Scoping Report

3.11 In addition, an Executive Summary was provided on line and available in hardcopy that briefly explained the content of each document. Details were also included of where and when the 'drop-in' events would be and telephone contact numbers were included in addition to email details.

3.12 For those wishing to return their Response Form in hardcopy, a variety of ways to achieve this were listed (see **Appendix 10**).

### **c) Main issues and concerns raised**

3.13 Shortly after starting the consultation the Government announced a snap General Election which caused the Forum to consider abandoning the process or risk a potential problem of 'clip board fatigue' that made obtaining responses to the consultation more difficult to achieve.

3.14 During this period further concern arose when the General Election campaign was suspended for 2 days due to a major terrorist incident in Manchester on 22 May 2017.

3.15 In discussion with Council staff it was agreed that the scale of response being achieved by the consultation was showing to be exceptional both in numbers and extent of consideration being expressed and the consultation continued.

3.16 204 written submissions were received from 192 respondents. By comparison this was higher than received by the Council in response to the Local Plan consultation from Torbay overall. The difference between the number of

submissions (204) and respondents (192) was due to respondents deciding to add to their previous submissions through an additional submission. Where this occurred, the views expressed have been assembled together to avoid double counting. Very few (9) gave incomplete contact details but provided information sufficient to show distortions were not being generated by anonymous responses. No petitions were received.

3.17 Submissions received grouped readily into the following sources and were assigned identification references shown below (Table 3.3):

**Table 3.1 Source of submissions received**

Submissions	Hardcopy	Online
a) By Individual persons	A001 – A092	A101 – A181
b) By Organisations	B001 – B014	B100 – B108
c) By Statutory Bodies	C001 – C006	C101 – C103

3.18 In statistical terms, the results were:

- **Response method used** - 55% of all submissions received were made in hard copy and 45% online (Table 3.2). This compared closely with the Stage 2 consultation which produced 53% using Freepost and 47% online (see Appendix 1).

**Table 3.2 Response method used**

Submissions	Web	Direct	Total	Web	Direct	Total
Individuals	81	92	173	47%	53%	100%
Organisations	8	14	22	36%	64%	100%
Statutory Bodies	2	7	9	22%	78%	100%
All	91	113	204	45%	55%	100%

*Note: percentages may not sum due to rounding*

- **Support for the Plan proposed (Question 1)** – 90% of responding individuals said they supported the Plan. Only 8% did not and 1% gave no answer (Table 3.3). This suggests the prospect of a successful outcome at Referendum stage. Of submissions made by organisations (including companies), only 15% said they did not support the Plan.

**Table 3.3 Support for the plan**

Respondents	Yes	No	Un/A	Total	Yes	No	Un/A	Total
Individuals	150	14	2	166	90%	8%	1%	100%
Organisations	9	3	8	20	45%	15%	40%	100%
Statutory Bodies	2	1	3	6	33%	17%	50%	100%
All	161	18	13	192	84%	9%	7%	100%

*Note: percentages may not sum due to rounding*

- **Changes suggested (Question 2)** – 64% of responding individuals saw no need for change to be made to the Plan, 28% put forward suggested changes and 8% did not answer (Table 3.4). In contrast, 75% of organisations that made submissions proposed changes, and 33% of the statutory bodies.

**Table 3.4 Changes suggested**

Respondents	Yes	No	Un/A	Total	Yes	No	Un/A	Total
Individuals	47	107	12	166	28%	64%	7%	100%
Organisations	15	3	2	20	75%	15%	10%	100%
Statutory Bodies	2	1	3	6	33%	17%	50%	100%
All	64	111	17	192	33%	58%	9%	100%

Note: percentages may not sum due to rounding

- **Cover colour preferred (Question 3)** – the preference expressed was for the final Plan submitted to have a green cover in place of blue.

**Table 3.5 Cover colour preferred**

Respondents	B	G	Un/A	Total	B	G	Un/A	Total
Individuals	57	102	7	166	34%	61%	4%	100%
Organisations	1	9	10	20	5%	45%	50%	100%
Statutory Bodies	0	1	5	6	0%	17%	83%	100%
All	58	112	22	192	30%	58%	11%	100%

Note: percentages may not sum due to rounding

- **Registered Paignton voter (Question 4)** – 84% of responding individuals were registered voters in Paignton, 12% were not and 4% did not answer. This again compares very closely with the Stage 2 results of 85%, 8% and 7% respectively and gives confidence to the results received as pointing to the likelihood of a successful outcome at Referendum stage (see Appendix 1).

**Table 3.6 Registered voter in Paignton**

Respondents	Yes	No	Un/A	Total	Yes	No	Un/A	Total
Individuals	139	20	7	166	84%	12%	4%	100%
Organisations	-	-	-	-	-	-	-	-
Statutory Bodies	-	-	-	-	-	-	-	-
All	139	20	7	166	84%	12%	4%	100%

Note: percentages may not sum due to rounding

- **Age Group of respondent (Question 5)** – this was very similar to the response received from individual person submissions at Stage 2 in 2012 (see paragraph 2.19 and Appendix 1):

**Table 3.7 Age group of respondents**

Individuals	Stage 2	Reg 14
0-16	0%	1%
16-24	3%	2%
25-34	6%	4%
35-44	12%	6%
45-54	17%	14%
55-64	21%	25%
65-74	25%	30%
75+	9%	13%
Not Answered	7%	4%
Total	100%	100%

Note: percentages may not sum due to rounding

3.19 Main issues and concerns that were raised (principally in answers to Question 2) are summarised below under each of the three responding groups:

- 1) Individual persons
- 2) Organisations (including development companies)
- 3) Statutory Bodies

### **1) By Individual persons**

- Strong support for plans' evidence base and balance of proposals (many)
- Seeking traffic changes or proposals in specific locations (A083, A149, A179, A176, A088, A085, A151, A161, A018, A104)
- Concern about continuing impact of HMOs (A105)
- Minor boundary adjustment in specific locations (A148, A160)
- Text clarifications sought (A159, A145)
- Give greater support for self-build (A126)
- More control of agricultural buildings sought (A132)
- More detailed proposals needed that promote implementation of PNP1 (all areas) (A176)
- Prevent re-opening of Yalberton Quarry (A173)
- Greater protection of Lidstone Lane required (A173)
- No proposal for supporting the Arts (A163, A158)
- Concern that parking charges are a deterrent to tourists (A163)
- Review building on Greenfield land (A152, A155, A154, A153, A135, A081)
- Policy wording of PNP19 (Rural Character Area) not strong enough (A171)
- Relocate Vue (formerly Apollo) building from seafront to inland (A151)
- Importance of greenspaces to mental health (A079)
- Need for a Heritage Museum (A115)
- Site specific suggestions for localised town enhancements (A115)
- Protect greenspace and re-use vacant retail sites for homes (A073)
- Be bolder in re-focusing key locations as proposed in the plan (A104)
- Need for cross referencing to be expanded to improve readability (A103)
- Designate The Blagdons an Area of Outstanding Natural Beauty (A167)
- Expand PNP24 to deal with flooding problem at Collaton St.Mary (A144)
- Revise boundary of Local Plan future growth area FGA.SS2.2 (A172)
- Not in agreement with any of the plans aims and proposals (A157)
- Growing imbalance between provision of homes and jobs and emerging damage to the local environment (A169, A142)
- Not enough affordable housing (A128)
- Inadequate arrangements to read the plan and understand it (A168)
- Reduce density of housing at Collaton St.Mary and favour self-build (A043)
- Give Paignton greater say in further development at White Rock (A177)

### **2) By Organisations (including development companies)**

- Preserve our greenspaces for future generations (B005)
- Strong support for the plan and clarity of the evidence base (B002)
- Support for plans recognition of the UNESCO Geopark designation (B007)
- Support for heritage proposals in local economy and environment (B104)
- Local 'signals' show the adopted Local Plan needs urgent review (B011)
- Objection to PNP1 Annex 1 c) for unused sites to be made over to food growing and NPPF173 viability and delivery (B011)
- PNP13 (first occupancy restriction) sensible subject to viability (B011)
- Cycle network could be further improved (B103)
- Support for PNP4 and PNP11 effect on future Theatre provision (B102)

- Numerous wording clarifications and enhancements proposed throughout the Plan and Supporting Evidence document (B103)
- Extra Local Green Space proposed for designation (Ramshill Copse) (B103)
- Need for sewer problems to be addressed with a timetable defined (B108)
- Failure to comply with Collaton St. Mary Masterplan SPD (B009, B008)
- Land supply phasing and reverting to job led growth undermines the Local Plan against NPPF184 (B009, B008, B010)
- Plan's approach is inconsistent with NPPF47 and NPPF16 (B009, B008)
- Fails para 8(2) of Schedule 4B of the Town & Country Planning Act (B009, B008)
- Local Green Space LGS60 not consistent with Local Plan and PPG (B008)
- Include submission on art and culture into the plan at PNP6 (B105, B106, B107)
- Include designing out crime as a specific policy (B003)
- No implications for power and gas needs (B006)
- Include a policy requiring developer contributions to railways (B012)
- No specific comment on water matters at this time (B001)
- Wording amendments proposed to address traffic generation from development at Great Parks, Collaton St. Mary and town centre / seafront areas (B014)

### 3) Statutory bodies

- Support for plan and supporting information (C004)
- Support for water policy in PNP1 Annex 3 as fully justified (C001)
- Clear understanding of local identity and the area's heritage assets (C005)
- Need to include specific reference to all designated Sites of Special Scientific Interest and Special Areas of Conservation that exist (C006)
- Strengthen biodiversity element of PNP1 to cover all aspects (C006)
- Support for Annex 1 to policy PNP1 (C006)
- Need to improve readability of some of maps used (C006)
- If development sites are allocated it will need SA/HRA (C006)
- Support for Yalberton Valley proposal (C102)
- Amend PNP12 to include connectivity improvement more widely (C102)
- Objection to absence of site allocations (C002, C003)
- Wording and plan amendments suggested throughout (C002)
- Objection to 19 of 41 publicly owned sites shown for Local Green Space designation (C002, C003)
- Objection to PNP13 first occupancy restriction (C003)
- Objection to para 6.41 including Little Blagdon Farm as a local food production asset (C003).

### In Summary

3.20 The main issues and concerns raised fell into the following:

- **Individual persons** - submissions supported the plan overwhelmingly as reflecting what the community wish to see achieved in the area based on clear and compelling evidence. Where changes were suggested by respondents, they sought to enhance the proposals.
- **Organisations** - concerned with housing provision as national house builders (3 in all) objected to the plan, though another national house builder supported the conclusions reached in the plan regarding the unsustainable position now reached in the balance of jobs and housing provision.

- **Statutory bodies** – all supported the Plan apart from the Council who objected to the absence of site allocations and inclusion of 19 sites in public ownership being designated as Local Green Space. No objections to Local Green Space proposals have been received from the 71 private landowners (3.4 i) above).

#### **d) How considered and addressed**

3.21 Before submitting the Plan to the Council under Regulation 15, each submission received from respondents has been considered in full by the Forum and a response provided as shown in **Appendix 11** to this document.

3.22 The Appendix records verbatim each submission received and the Forum's response in the right hand column. Wherever possible the views received have been taken into the Plan where it is possible and appropriate to do so, thereby strengthening still further the prospect of a positive outcome at the Referendum stage. Where it has not been possible or appropriate to make adjustment to the Plan, the reason for this is shown

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## Appendices

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Appendix 1 – Stage 2 Questionnaire Results

Appendix 2 – Neighbourhood Planning Regulation 14 and Schedule 1

Appendix 3 – Consultation letters sent by the Forum

Appendix 4 – Main poster displayed across the Neighbourhood area

Appendix 5 – Public Notice placed in local press

Appendix 6 – Drop-in events during the consultation

Appendix 7 – Plan of locations referred to in Part 3

Appendix 8 – Media articles published during the consultation

Appendix 9 – Consultation via Torbay Council and Torbay Community  
Development Trust

Appendix 10 - Response Form

Appendix 11- Stage 3 Pre-Submission consultation results and response to  
submissions received (Regulation 14 stage)

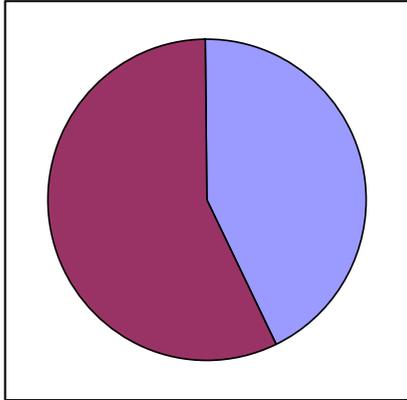
## Appendix 1



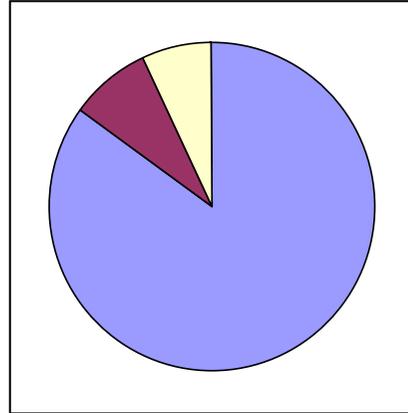
## STAGE 2 QUESTIONNAIRE RESULTS

JANUARY 2013

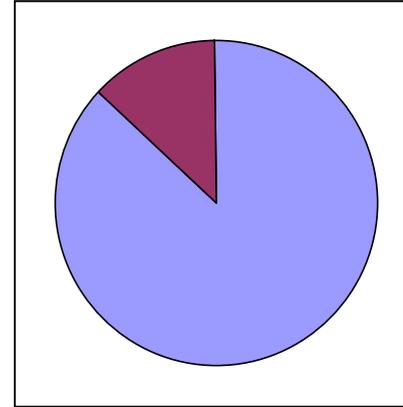
## A few headlines



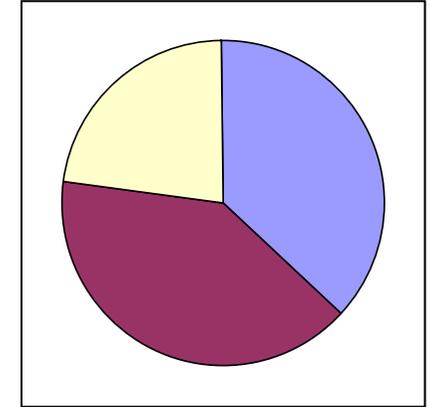
**Responses**  
 29,548 Comments (Q1-Q22) in  
 381 Questionnaires  
 47% Online 53% Freepost



**Voter in Paignton**  
 85% Yes 8% No  
 7% Not answered



**Name & Address Given**  
 87% Yes  
 13% Incomplete



**Gender**  
 37% Male 40% Female  
 23% Not answered

0-16	0%
16-24	3%
25-34	6%
35-44	12%
45-54	17%
55-64	21%
65-74	25%
75+	9%
Not Answered	7%
<b>Total</b>	<b>100%</b>

**Age**

Live in Paignton	80%
Work in Paignton	25%
Councillor in Paignton	1%
Property Owner in Paignton	50%
Retailer in Paignton	9%
Org representative	5%

**Forum Categories**

Aims	Yes	No	Not answered
Make more of the tourism and retail offer	90%	5%	5%
Improve points of arrival and connectivity	87%	5%	8%
Protect the local identity	87%	3%	10%
Ensure there is balanced development	85%	5%	10%

**Stage 1 Aims**

## Town Centre & Seafront Area

**Question 1:** Do you agree the overall Aims for the Town Centre & Seafront should be:

		Yes	No	Not answered
a)	• Make more of the tourism and retail offer	90%	5%	5%
b)	• Improve the points of arrival and connectivity	87%	5%	8%

**Question 2:** Are there other overall Aims you consider this area should have ?

195 Written comments

**Key proposals of the Plan directed at these aims would be:**

**Question 3:** Torbay Road

Already an important tourist asset

Do you agree with the following proposals ?

		Yes	No	Not answered
a)	Encourage the Picture House back into life as a tourist attraction	81%	17%	2%
b)	Greater use of the Steam Railway attraction as a tourist gateway	91%	6%	3%
c)	Encourage more use of the wide pavements for outdoor cafés	60%	36%	4%
d)	Encourage sympathetic improvement of the walkway canopies	94%	3%	3%
e)	Explore the options for pedestrianisation	69%	24%	7%

f) What other proposals do you consider are achievable in Torbay Road ?

166 Written comments

#### **Question 4: Victoria Street**

Already pedestrianised, and our prime shopping street.

Do you agree with the following proposals in the street ?

		Yes	No	Not answered
a)	More use of the street surface for outdoor café seating areas	62%	36%	2%
b)	More open air markets and similar attractions in the street	81%	17%	2%
c)	Keep existing street trees and public seating capacity	96%	3%	1%
d)	Encourage more use of vacant floors at upper levels	90%	7%	3%
e)	Encourage removal of weeds and unsympathetic building repairs	85%	13%	2%
f)	Improve crossings or uneven surface problems	82%	15%	3%

g) What other proposals do you consider are achievable in Victoria Street ?

162 Written comments

#### **Question 5: Transport 'Gateway'**

Heavy rail, steam rail, bus, taxi, long distance coach stop, and public parking facilities all meet at this critical point centrally located between the main shopping area of Victoria Street and tourist route of Torbay Road.

Do you agree with the following proposals in the short term ?

		Yes	No	Not answered
a)	Small scale changes that collectively improve pedestrian connection	86%	8%	6%
b)	Provision of Public Toilets	92%	6%	2%
c)	Improved signage for visitors of necessary transport connections	88%	8%	4%
d)	Improved surface connections for users with disabilities	88%	7%	5%

Not all space in the vicinity of Great Western Road is of a shape that fosters ease of use.

Do you agree with the following in the <u>longer term</u> :		Yes	No	Not answered
a)	Evaluate the possibility of providing a Transport Hub if possible onto one site – to bring different forms of transport closer together	66%	27%	7%

**Question 6: Hyde Road, Crossways & Torquay Road**

As a point of arrival by road, the area provides a thriving scene of business frontages. The main exception being a high level of vacant space at Crossways shopping centre which our community has indicated could provide scope for change. The centre has an overhead multi-storey car park and incorporates an important pedestrian link between Torquay Road, Hyde Road, and beyond.

Do you agree with the following proposals ?		Yes	No	Not answered
a)	Crossways shopping centre should continue to provide space for growth of new retail opportunities.	55%	40%	5%
b)	Retain the primary and secondary shopping role of Hyde Road	84%	9%	7%
c)	If one is needed, welcome Crossways shopping centre as the priority town centre location for a supermarket.	53%	42%	5%
d)	Explore more radical options to help improve Crossways	91%	6%	3%

**Question 7: Victoria Square & Principal Hotel Accommodation Area (PHAA)**

Tourist accommodation providers in the area wish to develop extra ‘themed’ holidays and retain the primary use of this area, not its re-use for general housing or conversions into Housing in Multiple Occupation (HMO’s).

Do you agree with the following proposals ?		Yes	No	Not answered
a)	Retain the designated area for tourist accommodation	76%	17%	7%
b)	Encourage ‘themed markets’ on Victoria Square	78%	20%	2%

c)	Retain the existing number of multi-storey car park spaces	72%	23%	5%
d)	Support equivalent replacement of any off-street car parking lost	70%	23%	7%

### **Question 8: Victoria Park**

The public park is well used and an attractive key route through the town centre area to the seafront. It is not supported by the Forum as an option for supermarket development and will be shown in the Plan as a protected area.

Do you agree with the following proposals ?		Yes	No	Not answered
a)	Victoria Park must be kept as public open space and protected	96%	2%	2%
b)	Support will only be given for any enhancement of the Park that is not to the detriment of:			
b1	<ul style="list-style-type: none"> <li>its open space appearance</li> </ul>	94%	2%	4%
b2	<ul style="list-style-type: none"> <li>use for open space recreation</li> </ul>	95%	1%	4%
b3	<ul style="list-style-type: none"> <li>means of pedestrian connection</li> </ul>	93%	2%	5%

### **Question 9: Winner Street & Palace Avenue**

These two areas form attractive examples of Paignton's historical and architectural heritage with potential for appeal to further tourism through positive action.

Do you agree with the following proposals ?		Yes	No	Not answered
a)	Support maximum use of the Palace Theatre as a key facility	96%	3%	1%
b)	Encourage 'specialty' shops in Winner Street for tourists and residents	93%	4%	3%
c)	Support use of Palace Gardens for 'themed' markets and events	59%	36%	5%
d)	Protect Palace Gardens from inappropriate development	96%	2%	2%

e)	Support more use of the highway area for themed events	62%	32%	6%
f)	Remove street eyesores that detracts from the visual appearance	83%	14%	3%
g)	Improve footpath connectivity with the transport hub and seafront	83%	12%	5%
h)	Encourage sympathetic improvements to shop and building fronts	94%	2%	4%
i)	Promote new forms of transport connections such as 'bus links' with Winner Street that would add tourist footfall to the area	77%	18%	5%

j) What else do you feel could attract more tourists and resident shoppers to the area ? 175 Written comments

#### **Question 10: Seafront & Harbour**

The beaches, greens, pier and facilities along the seafront are critical elements of Paignton's tourism offer. In addition, the greens have a long standing use by residents for sports and pastimes throughout the year. The Harbour is not as well used by tourists as at Torquay or Brixham.

Do you agree with the following proposals ?

		Yes	No	Not answered
a)	Attract tourists to the Harbour area as a key objective of the Plan	82%	16%	2%
b)	Support a heritage 'Theme' for the harbour	70%	27%	3%
c)	Modernise the harbour with a mix of business and residential units	55%	40%	5%
d)	Encourage more use of the harbour for water sport	70%	27%	3%
e)	Enhance existing harbour off street parking for greater tourist use	71%	24%	5%
f)	Safeguard the harbour's 'quaintness'	90%	7%	3%
g)	Protect Paignton Green as open space for future generations	96%	2%	2%
h)	Upgrade the shelters to improve the tourism offer	86%	9%	5%
i)	Support a facelift of the Apollo complex	64%	30%	6%

**Question 11: Area Proposals**

Other policies and proposals would be included to support improvement across different parts of the area or overall:

Do you agree with the following proposals ?		Yes	No	Not answered
a)	Support the Business Improvement District (BID) and provision of independent traders as an attraction to tourists	76%	19%	5%
b)	Incorporate a Design Guide to improve the townscape, protection of heritage assets, and treatment of unattractive features	77%	17%	6%
c)	Support retention of residential areas within the town centre as part of ensuring the area remains in use throughout the whole day	94%	2%	4%
d)	Promoting transport connectivity between all the forms of transport	90%	5%	5%
e)	Encourage energy conservation and measures that help adapt to, and fund, the impact of flood risk and climate change	90%	6%	4%

**Question 12: Are there are any other proposals that should be included ?**

152 Written comments

**Western Area of Paignton**

**Question 13: Do you agree the overall Aims for the Western Area should be:**

		Yes	No	Not answered
a)	<ul style="list-style-type: none"><li>Protect the local identity</li></ul>	87%	3%	10%
b)	<ul style="list-style-type: none"><li>Ensure there is balanced development</li></ul>	85%	5%	10%

**Question 14: Are there other overall Aims you consider this area should have ?**

117 Written comments

**Key proposals of the Plan directed at these Aims would be:**

**Question 15: Area wide Policies and Proposals**

There are not enough jobs or homes to meet the needs of existing residents. The draft Local Plan confirms that a 5 year supply of new sites exists for new homes. Pressures beyond 5 years will depend on how many people move into the area from outside of Torbay. Without more people from outside, Torbay's population level will drop, because deaths exceed births every year, with mixed consequences for our town.

Do you agree with the following proposals ?

		Yes	No	Not answered
a)	We should plan for a drop in the level of resident population	62%	28%	10%
b)	Give priority to employment led growth, not housing led growth	91%	4%	5%
c)	Allocate further land for jobs only in sustainable locations	81%	9%	10%
d)	Keep the number of additional jobs and homes in 'balance' always	86%	6%	8%
e)	Provide more local shops only if the population increases	62%	29%	9%
f)	Increase the amount of Affordable housing to meet local need	71%	19%	10%

If you said 'No' to any of the above questions, please give your reason.

190 Written comments

**Question 16: Open Countryside**

Our 'English Riviera' environment provides our unique identity, attracting tourists from far and wide, producing a significant source of local income. It is essential to food production, wildlife and biodiversity. We are the resident custodians. How we treat the environment matters a lot.

Do you agree with the following proposals ?		Yes	No	Not answered
a)	Restricting development in our open countryside is still justified	87%	10%	3%
b)	Building for local need is more important than loss of countryside	17%	77%	6%
c)	Parts of our countryside are no longer worth keeping	8%	85%	7%

If you said 'Yes' to the last question, please say where ?

61 Written comments

### **Question 17: Great Parks**

The last phases of construction at Great Parks will continue to be included in the Plan.

Do you agree with the following proposals ?		Yes	No	Not answered
a)	Assess the scope for a country park in the Westerland Valley	76%	10%	14%
b)	Enhanced community facilities are required to serve the area	49%	30%	21%

If you said 'Yes' to the last question, please say what is lacking in the Great Parks area ?

122 Written comments

### **Question 18: White Rock and nearby areas**

Recent planning permissions have been granted for more jobs and homes. Some of the homes will be built on reallocation of employment land. Re-use of formerly developed employment land and remaining allocations will provide additional opportunities for job growth.

Do you agree with the following proposals ?		Yes	No	Not answered
a)	Should any more employment land be given over to build new homes ?	20%	71%	9%

b)	Priority should be given to new technology developments (e.g. hi-tech engineering, research, energy conservation)	69%	21%	10%
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What other needs do you consider the plan should meet ?

133 Written comments

**Question 19: Western Corridor** (Kings Ash Road / Brixham Road)

There will be no new bypass over the next 20 years, as funds will be unavailable. Tweenaway Cross has been improved recently with government money. Any further improvement will only be possible through developer contributions.

Do you agree with the following proposals ?

		Yes	No	Not answered
a)	Further development should only take place if there are developer contributions that meet the road improvement costs	65%	23%	12%

b) Which part (or parts) of the route do you consider need improving ?

175 Written comments

**Question 20: Yalberton Valley**

Yalberton Valley in the south has been designated nationally as an Area of Outstanding Natural Beauty (AONB). We believe the time has come to recognise the value of the part that lies within Paignton.

Do you agree with the following proposals ?

		Yes	No	Not answered
a)	The whole valley has 'Country Park' potential for tourists and locals	72%	13%	15%

If you said 'Yes', please say what features of the valley you value most ?

171 Written comments

**Question 21: Collaton Village**

Collaton St. Mary is the gateway to Torbay from Cornwall, Plymouth, and South Hams and has maintained its identity as a village setting in open countryside. Any further development needs to enhance the tourist appeal.

Do you agree with the following proposals ?

		Yes	No	Not answered
a)	The local identity of Collaton St. Mary must not be lost	84%	4%	12%
b)	Facilities currently lacking are:			
b1	• Local jobs	60%	18%	22%
b2	• Bus frequency	52%	23%	25%
b3	• Local school facilities	23%	50%	27%
b4	• Local shops	59%	18%	23%
b5	• Youth facilities	55%	19%	26%
b6	• Medical facilities	56%	19%	25%
b7	• Other community facilities	44%	24%	32%

Are there any other needs that you consider Collaton St. Mary has ?

141 Written comments

**Question 22: Your Suggestions**

Are there any other proposals you consider should be included in the Western Area ?

102 Written comments

**Question 23: About yourself:**

		Yes		Incomplete
a.b.c)	Name and Address given	87%		13%

		Male	Female	Not answered
a.b.c)	Gender	37%	40%	23%

		Yes	No	Not answered
d)	Which age group do you belong to ?			6%
	0 – 16 years	0%		
	16- 24	3%		
	25- 34	6%		
	35- 44	12%		
	45- 54	17%		
	55- 64	21%		
	65- 74	25%		
	75+	9%		

		Yes	No	Not answered
e)	Do you consider yourself disabled in any way ?	11%	83%	6%

f)	If you said yes to Q23e, please tell us how it affects you			
f1	<ul style="list-style-type: none"> <li>It affects my mobility</li> </ul>	26		
f2	<ul style="list-style-type: none"> <li>It affects my vision</li> </ul>	7		
f3	<ul style="list-style-type: none"> <li>It affects my hearing</li> </ul>	9		
f4	<ul style="list-style-type: none"> <li>It affects me in another way</li> </ul>	15		

		Yes		
g)	How would you describe your Ethnicity ?			
	<ul style="list-style-type: none"> <li>White</li> </ul>	73%		
	<ul style="list-style-type: none"> <li>Mixed race</li> </ul>	1%		
	<ul style="list-style-type: none"> <li>Asian or Asian British</li> </ul>	1%		
	<ul style="list-style-type: none"> <li>Black or Black British</li> </ul>	0%		
	<ul style="list-style-type: none"> <li>Other</li> </ul>	0%		
	<ul style="list-style-type: none"> <li>Prefer not to say</li> </ul>	25%		

		Yes	No	Not answered
h)	Are you a registered voter in Paignton ?	85%	8%	7%

Do you qualify to be a member of the Paignton Neighbourhood Forum because:		Yes		
i1	You live in the Neighbourhood Area	80%		
i2	You work in the Neighbourhood Area	25%		
i3	You are a Torbay Councillor for part of the Neighbourhood Area	1%		
i4	You own property in the Neighbourhood Area	50%		
i5	You are a retailer in the Neighbourhood Area	9%		
i6	You are the appointed representative of a local organisation operating in the Neighbourhood Area	5%		

If you would like to join the Forum, you can apply on-line at:  
[www.paigntonneighbourhoodplan.org.uk](http://www.paigntonneighbourhoodplan.org.uk)

## Appendix 2

### **Neighbourhood Plan Regulation 14 and Schedule 1**

#### **Pre-submission consultation and publicity**

**14.** Before submitting a plan proposal to the local planning authority, a qualifying body must:-

- (a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area –
  - (i) details of the proposals for a neighbourhood development plan;
  - (ii) details of where and when the proposals for a neighbourhood development plan may be inspected;
  - (iii) details of how to make representations; and
  - (iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first published;
- (b) consult any consultation body referred to in paragraph 1 of Schedule 1 (*see below*) whose interests the qualifying body consider may be affected by the proposal for a neighbourhood development plan; and
- (c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.

#### **SCHEDULE 1**

#### **Neighbourhood development plans**

- 1.** For the purposes of regulations 14 and 16, a “consultation body” means –
- (a) where the local planning authority is a London borough council, the Mayor of London;
  - (b) a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;
  - (c) the Coal Authority(**a**);
  - (d) the Homes and Communities Agency(**b**);
  - (e) Natural England(**c**);
  - f) the Environment Agency(**d**);
  - (g) the Historic Buildings and Monuments Commission for England (known as English Heritage)(**e**);
  - (h) Network Rail Infrastructure Limited (company number 2904587);
  - (i) the Highways Agency;
  - (j) the Marine Management Organisation(**f**);
  - (k) any person—
    - (i) to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003; and

- (ii) who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority;
  - (l) where it exercises functions in any part of the neighbourhood area —
    - (i) a Primary Care Trust established under section 18 of the National Health Service Act 2006**(a)** or continued in existence by virtue of that section;
    - (ii) a person to whom a license has been granted under section 6(1)(b) and (c) of the Electricity Act 1989**(b)**;
    - (iii) a person to whom a license has been granted under section 7(2) of the Gas Act 1986**(c)**;
    - (iv) a sewerage undertaker; and
    - (v) a water undertaker;
  - (m) voluntary bodies some or all of whose activities benefit all or any part of the neighbourhood area;
  - (n) bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area;
  - (o) bodies which represent the interests of different religious groups in the neighbourhood area;
  - (p) bodies which represent the interests of persons carrying on business in the neighbourhood area; and
  - (q) bodies which represent the interests of disabled persons in the neighbourhood area.
- 

**(a)** See section 1 of the Coal Industry Act 1994 (c.21).

**(b)** See section 2 of the Housing and Regeneration Act 2008 (c.17).

**(c)** See section 1 of the Natural Environment and Rural Communities Act 2006 (c.16).

**(d)** See section 1(1) of the Environment Act 1995 (c.25).

**(e)** See section 32 of the National Heritage Act 1983 (c.47).

**(f)** See section 1 of the Marine and Coastal Access Act 2009 (c.23).

## Appendix 3

### **Consultation Letters sent by the Forum**

- a) Sent to every private owner of land proposed for Local Green Space designation in the Neighbourhood Plan giving full details and requesting response.

**PAIGNTON NEIGHBOURHOOD FORUM**

- Blatchcombe
- Clifton with Maidenway
- Goodrington, Roselands & Hookhills
- Paignton Town
- Preston



**Paignton  
neighbourhood  
plan**

c/o 34 Totnes Road  
Paignton  
TQ4 5JZ

16 April 2017

Dear

**Paignton Neighbourhood Plan – Proposed Local Green Space designations**

We are a group of dedicated volunteers from our local community working closely with Torbay Council to produce a new style Neighbourhood Plan for the whole of Paignton. Once adopted it will play a significant part in deciding any future planning applications in our area, all made possible by the Localism Act 2011.

The National Planning Policy Framework (NPPF) enables Local Green Space (LGS) to be designated when making a Local Plan or a Neighbourhood Plan. The new Torbay Local Plan adopted by Torbay Council on 10 December 2015 left identification and designation of LGS for the Neighbourhood Plan to determine (*Local Plan paragraph 6.3.1.37*).

Accordingly, an assessment has been carried out by our community volunteers using the criteria identified in the NPPF and Government Planning Practice Guidance.

From enquiries made of the Land Register it is believed you may be an owner or part owner of one or more of the Local Green Spaces proposed for designation in the draft of the Neighbourhood Plan so far produced.

I am therefore writing to draw this to your attention so that you have the opportunity to give your views to the Forum in respect of the proposals in the draft Neighbourhood Plan during the period of Pre-Submission consultation that will be taking place from 19 April until 31 May 2017.

In summary, Local Green Space designation provides special protection against development for green areas of particular importance to local communities for a number of qualifying reasons. This may also be your own wish, however we need

Page 1 of 2

Continued overage

to ensure that you are aware of the current proposal and have the opportunity to let us have your views.

Listed below is the Neighbourhood Draft Plan site location reference number and address that we understand you may own in whole or part.

Full details of the proposal can be viewed on our website at:

[www.paigntonneighbourhoodplan.org.uk](http://www.paigntonneighbourhoodplan.org.uk) .

All of the LGS locations are shown in Part 7 of the main Neighbourhood Plan Draft and full details are given in Appendix 5 and 6 of the Supporting Information document. The proposed Policy that would apply to the LGS location is shown in Annex 1 to Policy PNP1 of the Draft Plan.

The site(s) believed to be within your ownership, or part ownership is:

Neighbourhood Plan site reference number	
Site name used	
Land Register Reference number	

If you do not have access to the internet, a reference copy of the Draft Plan and accompanying documents can be inspected at Paignton Library and Information Centre from 19 April until 31 May 2017.

If you wish to give views, they will be most welcome. Please reply to my address listed at the top of this letter **before 31st May 2017**:

If you require any further information, please let me know on 01803 523434 or by email to [info@paigntonneighbourhoodplan.org.uk](mailto:info@paigntonneighbourhoodplan.org.uk)

Yours sincerely

David Watts  
Chairman, Paignton Neighbourhood Plan Forum

b) Sent to Forum Members and Observers with no registered email address:

## PAIGNTON NEIGHBOURHOOD FORUM

- Blatchcombe
- Clifton with Maidenway
- Goodrington, Roselands & Hookhills
- Paignton Town
- Preston

The logo for the Paignton Neighbourhood Plan features three interlocking puzzle pieces in blue, white, and orange, with a yellow sun icon above them. To the right of the puzzle pieces, the text 'Paignton neighbourhood plan' is written in a sans-serif font, with 'Paignton' on the top line, 'neighbourhood' in the middle, and 'plan' on the bottom line.

c/o 34 Totnes Road  
Paignton  
TQ4 5JZ

16 April 2017

Dear Forum Member

**Pre-Submission Draft Paignton Neighbourhood Plan**

As the Forum does not have your email address, I am writing to draw to your attention that a formal consultation on the Pre-Submission Draft Neighbourhood Plan will be taking place during the period from 19 April until 31 May 2017.

if you are not able to view the documents on the Forum's website, they will be available to inspect during normal open hours at Paignton Library and Information Centre and at any of event times listed overleaf.

Please give your views to any of the points listed overleaf **before 31st May 2017**:

Yours sincerely

*David Watts*

David Watts  
Chairman, Paignton Neighbourhood Plan Forum

Page 1 of 2

Continued overpage

Before giving your views please look at the document set produced. A set is available to inspect at Paignton Library and Information Centre, at any of the event times listed below and on the Forum's website address shown below.

Please return your views to any of the following points **before 31st May 2017**:

- By placing in the collection box at Paignton Library and Information Centre
- By hand to a Forum representative at any of the meetings or information points
- By post to Paignton Neighbourhood Forum, c/o 34 Totnes Road, Paignton TQ4 5JZ
- By emailing to [submissions@paigntonneighbourhoodplan.org.uk](mailto:submissions@paigntonneighbourhoodplan.org.uk)

Or if you wish to reply on-line, or find out more, please visit our website at [www.paigntonneighbourhoodplan.org.uk](http://www.paigntonneighbourhoodplan.org.uk) or telephone **(01803) 469185** or **523434**

Volunteers will also be available to help you in person at the following points during the consultation period that starts on 19 April 2017:

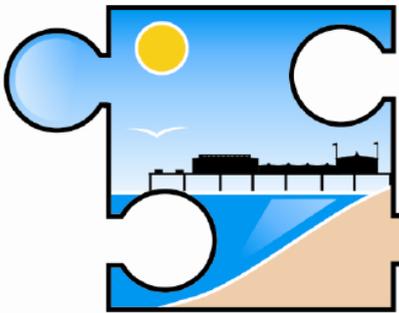
<b>Wednesday 19 April 2017</b>	Paignton Library & Information Centre, Great Western Road.	10am – 3pm
<b>Thursday 20 April 2017</b>	Neighbourhood Forum Meeting, Gerston Chapel Hall, Torquay Road (Gerston Place entrance)	6:30pm-8:30pm
<b>Friday 21 April 2017</b>	Coffee Morning Drop-in Paignton Baptist Church, Winner Street	10:30am-12:30pm
<b>Saturday 22 April 2017</b>	Victoria Street Roadshow, Victoria Street, Paignton	10am-1pm
<b>Monday 24 April 2017</b>	Preston Community Partnership Meeting, The Manor Pub, Manor Road, Preston	7pm-9pm
<b>Tuesday 25 April 2017</b>	Paignton Library & Information Centre, Great Western Road.	10am-12noon
<b>Saturday 29 April 2017</b>	Collaton St. Mary Roadshow, Collaton St. Mary Parish Hall, Blagdon Road, Paignton	10am-5pm
<b>Saturday 29 April 2017</b>	Neighbourhood Plan Meeting, Collaton St. Mary Parish Hall.	6:30pm-8:30pm
<b>Wednesday 3 May 2017</b>	Paignton Town Centre Community Partnership Meeting, Paignton Baptist Church, Winner Street	6pm-8pm
<b>Friday 5 May 2017</b>	Paignton Library & Information Centre, Great Western Road.	1pm-3pm
<b>Saturday 6 May 2017</b>	Victoria Street Roadshow, Victoria Street, Paignton	10am-1pm
<b>Monday 15 May 2017</b>	Paignton Library & Information Centre, Great Western Road.	10am-12noon
<b>Tuesday 16 May 2017</b>	Paignton Library & Information Centre, Great Western Road.	2pm-4pm
<b>Thursday 18 May 2017</b>	Neighbourhood Forum Meeting, Gerston Chapel Hall, Torquay Road (Gerston Place entrance)	6:30pm-8:30pm
<b>Saturday 20 May 2017</b>	Rotary Car Boot Event, Goodrington Methodist Church, Grange Road, Goodrington	10am-2pm
<b>Wednesday 31 May 2017</b>	Victoria Street Roadshow, Victoria Street, Paignton	10am-1pm

Reference copies of the Full Plan, accompanying documents, summary document and Response Forms are available throughout the consultation period at Paignton Library and Information Centre, online at [www.paigntonneighbourhoodplan.org.uk](http://www.paigntonneighbourhoodplan.org.uk) and at the above listed events.

For more information please call 01803 469185 or 01803 523434 or email [info@paigntonneighbourhoodplan.org.uk](mailto:info@paigntonneighbourhoodplan.org.uk)

## Appendix 4

Main poster displayed across the area



# Paignton neighbourhood plan

*Tell us what you think of the draft plan !*

A formal plan produced by our community under the Localism Act 2011 that will be used to govern the conservation and development of Paignton up to 2030.

*The Areas included:*

- **Blatchcombe**
- **Clifton with Maidenway**
- **Goodrington, Roselands & Hookhills**
- **Paignton Town Centre**
- **Preston**

*How to find out more and give your views*

At Paignton Library & Information Centre, Great Western Road, TQ4 5AG  
Or online at [www.paigntonneighbourhoodplan.org.uk](http://www.paigntonneighbourhoodplan.org.uk)  
Or by email to [submissions@paigntonneighbourhoodplan.org.uk](mailto:submissions@paigntonneighbourhoodplan.org.uk)  
Or by post to the Neighbourhood Plan Forum c/o 34 Totnes Road, Paignton TQ4 5JZ  
Or at any of the upcoming event locations  
Or for more information telephone 01803 469185 or 01803 523434

**Please give your views by no later than 31 May 2017**

## Appendix 5

### Public Notice placed in the local press

The text below was agreed with officers of Torbay Council and published on Wednesday 19 April 2017 in the Herald Express weekly newspaper circulating throughout the Neighbourhood Plan area

TOWN AND COUNTRY PLANNING ACT 1990 -  
PLANNING AND COMPULSORY PURCHASE ACT 2004 -  
LOCALISM ACT 2011 -  
NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 -

#### **PAIGNTON NEIGHBOURHOOD PLAN**

The Paignton Neighbourhood Forum has prepared a Neighbourhood Plan for Paignton which it is seeking views upon prior to submission to Torbay Council for Publication, Examination and subsequent Referendum. **The Paignton Neighbourhood Plan (Regulation 14 Pre-Submission and Publicity version)** sets out details of how development will be managed within Paignton, in conjunction with the Torbay Local Plan 2012-2030, through to 2030.

**Views are invited on the contents of the Paignton Neighbourhood Plan and the accompanying documents.**

The Paignton Neighbourhood Plan is a written policy document with policy maps. The accompanying documents include a Sustainability Appraisal and Habitats Regulations Assessment Screening Report and other supporting information. The documents are being published for **formal representations** over a six week period from **10am Wednesday 19 April through to 5pm Wednesday 31 May 2017**.

Reference copies of the documents for inspection and a Response Forum are available on the Paignton Neighbourhood Forum's website ([www.paigntonneighbourhoodplan.org.uk](http://www.paigntonneighbourhoodplan.org.uk)) and at Paignton Library and Information Centre, Great Western Road, Paignton, TQ4 5AG. Further details on other places where the documents can be inspected and how to make representations are available on the above website and at the Library and Information Centre. Response can also be made by email to [submissions@paigntonneighbourhoodplan.org.uk](mailto:submissions@paigntonneighbourhoodplan.org.uk) or by post to Paignton Neighbourhood Forum c/o 34 Totnes Road, Paignton, TQ4 5JZ. All comments will be made available for public inspections and need to be received by no later than **5pm on Wednesday 31 May 2017**.

Paignton Neighbourhood Forum – April 2017

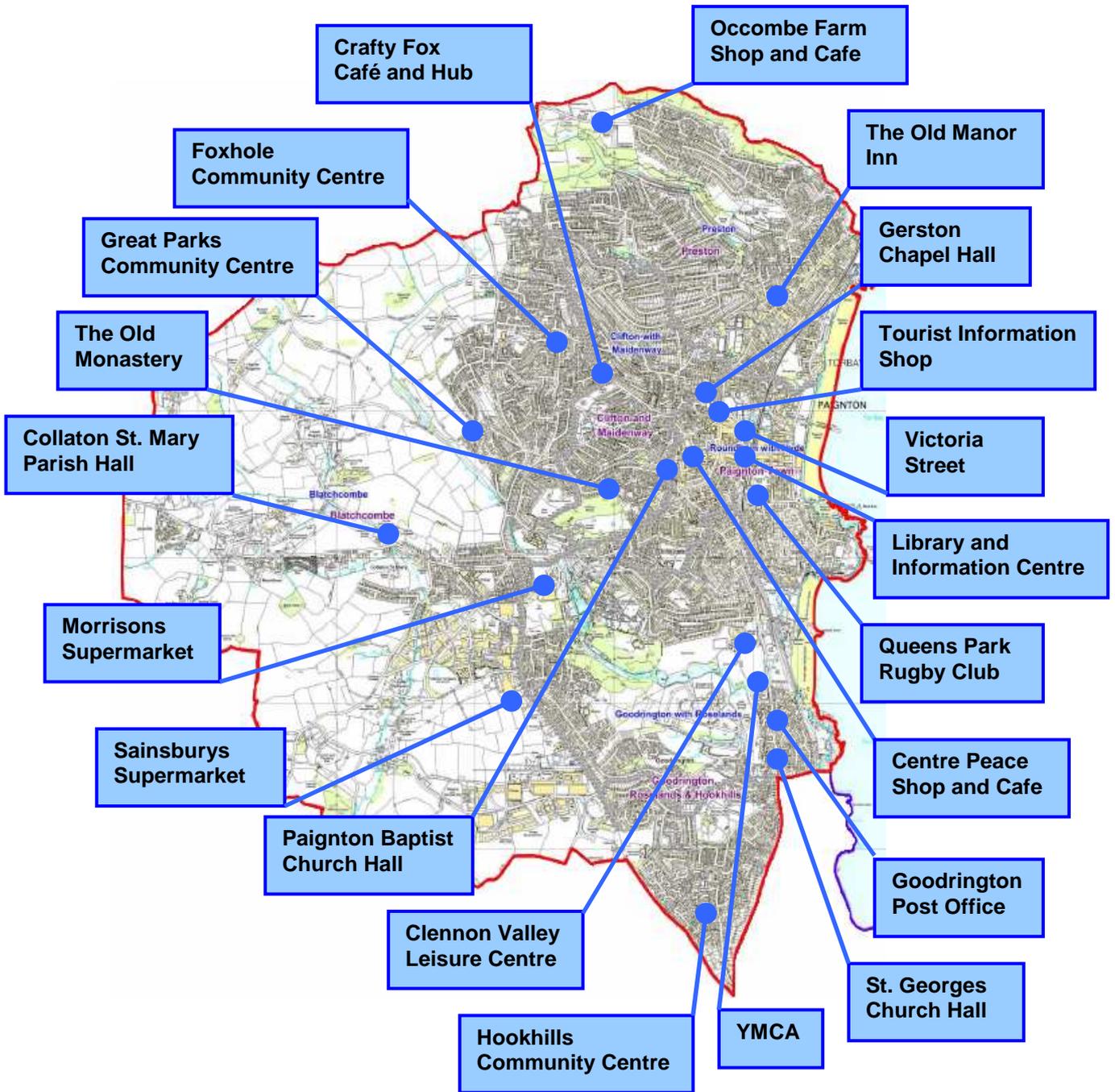
## Appendix 6

### **Drop in events held during the consultation**

Day 2017	Place	Time
Wed 19 April	Paignton Library & Information Centre, Great Western Road, Paignton, TQ4 5AG	10am-3pm
Thu 20 April	Gerston Chapel Hall, Torquay Road (Gerston Place entrance), Paignton TQ3 3DT	6:30pm-8:30pm
Fri 21 April	Coffee Morning Drop-in Paignton Baptist Church, Winner Street, TQ3 3LN	10:30am-12:30pm
Sat 22 April	Victoria Street Roadshow, Victoria Street, Paignton TQ4 5DS	10am-1pm
Mon 24 April	Preston Community Partnership Meeting, The Old Manor Inn, Old Torquay Road, Preston, TQ3 2QZ	7pm-9pm
Mon 24 April	Goodrington, Roselands and Hookhills Community Partnership Meeting, YMCA, Dartmouth Road, Paignton TQ4 6NX	7:45pm-8:45
Tue 25 April	Paignton Library & Information Centre, Great Western Road, Paignton, TQ4 5AG	10am-12noon
Wed 26 April	Clifton with Maidenway Community Partnership Meeting, Anode Office, The Old Monastery, Berry Drive, Paignton TQ3 3RD	6pm-7:30pm
Sat 29 April	Collaton St. Mary Roadshow, Collaton St. Mary Parish Hall, Blagdon Road, Paignton TQ3 3YA, Followed by Neighbourhood Plan Meeting.	10am-5pm 6:30pm-8:30pm
Wed 3 May	Paignton Town Centre Community Partnership Meeting, Paignton Baptist Church, Winner Street TQ3 3LN	6pm-8pm
Fri 5 May	Paignton Library & Information Centre, Great Western Road, Paignton, TQ4 5AG	1pm-3pm
Sat 6 May	Victoria Street Roadshow, Victoria Street, Paignton TQ4 5DS	10am-1pm
Sun 7 May	Car Boot Event, Sainsburys Supermarket Car Park, Yalberton Road, Paignton TQ4 7PE	4pm-5pm
Wed 10 May	Clennon Valley Leisure Centre, Penwill Way, Paignton TQ4 5JR	11am-2pm
Tue 16 May	Paignton Library & Information Centre, Great Western Road, Paignton, TQ4 5AG	2pm-4pm
Thu 18 May	Neighbourhood Forum Meeting, Gerston Chapel Hall, Torquay Road (Gerston Place entrance), TQ3 3DT	6:30pm-8:30pm
Sat 20 May	Rotary Car Boot Event, Drop-in, St. George's Church, Barn Road, Goodrington. Paignton TQ4 6NG	10am-2pm
Wed 31 May	Victoria Street Roadshow, Victoria Street, Paignton TQ4 5DS	10am-1pm

# Appendix 7

## Plan of locations referred to in Part 3



## Appendix 8

### Press articles published during the consultation period

64 HEX-E01-S2  
heraldexpress.co.uk

**News**

# your life

## Sophia Sheridan

Marketing and communications lead,  
Torbay Community Development Trust

### Time for you to have say on future of town

REGULAR readers of this column may remember the launch for consultation of the Brixham Peninsula Neighbourhood Plan and a little further back in time from that, the Torquay Neighbourhood Plan.

It is now time for residents and workers from Paignton to have their say on the future of the town.

The formal consultation period officially started last Wednesday and will run until 5pm on Wednesday, May 31.

Local residents, workers, businesses, councillors and other volunteers have produced the Draft Neighbourhood Plan for Paignton by working together as a forum.

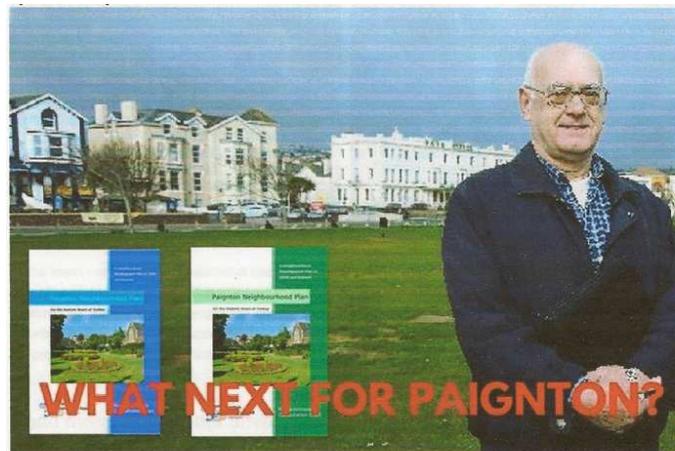
This has been made possible by the Localism Act 2011.

When it is finalised, the Neighbourhood Plan will become part of the statutory development plan for Paignton used by the council when making decisions on planning applications in the area over the next 20 years.

A neighbourhood plan is a type of plan which focuses on very local areas, which is produced by communities with parish and town councils, with the assistance of the council.

Policies included in neighbourhood plans are related to the use of land in the area that they cover or to spatial matters (i.e. aspects that affect how a place works).

When the neighbourhood plans are adopted, they will then form part of the overall development plan for Torbay and be used to consider all planning applications in that area, in the context



David Watts with the draft plan

#### Comments (0)

TIME is running out to have your say on the future of Paignton. For the past four weeks the Paignton Neighbourhood Forum has been conducting a formal consultation on their blueprint for its future development.

Proposals in the Draft Neighbourhood Plan include giving higher priority to net job growth, improving the tourism offer and enhancing Paignton's natural and historic environment.

Protecting local identity and ensuring there is balanced development where jobs and homes go hand in hand also forms a key part of the Plan. More than 60 sites are shown designated as formal Local Green Spaces.

<http://www.devonlive.com/have-your-say-on-plans-for-the-future-of-paignton/story-3...> 23/05/2017

#### News



News, views and sport are updated 24/7 at [DevonLive.com](http://DevonLive.com)

## Deadline looming on town's future

By TINA CROWSON  
tcrowson@heraldexpress.co.uk  
Twitter: @TinaCrowson

TIME is running out to have your say on the future of Paignton.

For the past four weeks the Paignton Neighbourhood Forum has been conducting a formal consultation on a blueprint for its future development.

Proposals in the Draft Neighbourhood Plan include giving higher priority to net job growth, improving the tourism offer and enhancing Paignton's natural and historic environment.

Protecting local identity and ensuring there is balanced development where jobs and homes go hand in hand also forms a key part of the Plan. More than 60 sites are shown designated as formal Local Green Spaces.

David Watts, chairman of the neighbourhood forum said: "There is particular concern that we are seeing a fall in job numbers despite the increase in supply of housing. This is falling to meet local needs and is not a sustainable way forward."



PROTECT: Paignton Neighbourhood Plan wants to preserve the canopy in Torbay Road, left, and rural areas like Westerland Valley, above

Among the headline proposals are:

In the town: encouraging residential use of vacant upper floors in Victoria Street; supporting greater use of tourist attractions; linking transport improvement with tourist attractions; ensuring distinctive town features are retained for example the shops canopy along Torbay Road; giving jobs led growth the priority for example at the former Nortel site; designating 62 'local green spaces' throughout Paignton for protection such as Roundham Head Park.

In the countryside: proposing a 'rural character area' for protection and biodiversity enhancement around the

Westerland Valley and Yalberton Valley areas.

Mr Watts said: "The proposed Plan is a very important document. Many local residents, workers, businesses, councillors and other volunteers have produced the draft by working together as a forum."

This has been made possible by the Localism Act 2011.

He added: "The Plan sets out the policies based on the objectives the community has said in previous stages need to be achieved in Paignton."

"Views can be sent to the Forum in a number of ways, which include a response form that asks five key questions. They can be placed in the collection boxes at any of the locations or returned to the Forum

using any of the methods listed on the form."

When views have been received by the Forum, the plan will then be submitted for independent assessment before registered voters in Paignton make the final decision in a referendum. The plan can then become a statutory development plan for Paignton.

Full copies of the documents can be inspected at Paignton Library in Great Western Road, Ocombe Farm Cafe and at the Clemmon Valley Leisure Centre. The consultation ends at 5pm on Wednesday, May 31.

The plan and supporting documents are also available to view and reply to on the Forum website at [www.paigntonneighbourhoodplan.org.uk](http://www.paigntonneighbourhoodplan.org.uk).

## Appendix 9

### **Consultations via Torbay Council and Torbay Community Development Trust**

In addition to consultations undertaken directly by the Neighbourhood Forum this Appendix lists (in alphabetical order) those undertaken on the Forum's behalf enclosing a letter from the Forum (9a and 9b of this Appendix). This joint working arrangement provided maximum safeguard of personal contact details whilst maximizing the extent of consultation.

**List 1:** Organisations and bodies consulted via Torbay Council

Notification went out from the Council by email to the **232 organisations and 46 individuals** shown in List 1 below comprising:

- 41 public authorities and bodies
- 52 community groups
- 139 companies
- 46 individuals

**List 2:** Community groups consulted via Torbay Community Development Trust

Notification of the Pre submission consultation went out from the Trust by email to the **211 community groups** in List 2 below. They were not limited only to Paignton based groups as many are Torbay wide. In addition to these groups the notification also went out to the following **147 interested parties and 247 individuals** who previously requested regular updates from the Trust on community matters.

- 16 businesses
- 38 independent care organisations
- 11 doctor's surgeries
- 15 educational establishments
- 61 members of staff of statutory organisations
- 3 VCSE groups from outside Torbay
- 2 national funders
- The Herald Express and
- 247 individuals.

<b>List 1: (alphabetical) Via Torbay Council</b>	<b>List 2: (alphabetical) Via Community Development Trust</b>
3	2nd Paignton Boys Brigade
ADL Design	ACE
AG Design	Acorn Centre
Age UK	Action For Children
Alder King	Activities For Health
Anderson Planning & Development Consultant	Admiral Swimming Pool
Anglican Home Improvements Windows	Age UK Torbay
Architect	Maelstrom Syndrome UK
Atkins	Alzheimer's Society

<b>List 1: (alphabetical) Via Torbay Council</b>	<b>List 2: (alphabetical) Via Community Development Trust</b>
Atlantis Holiday Apartments	Animals in Distress
Babbacombe Model Village	Anode
Barn Owl Trust	Artherius Society
Barton and Watcombe Community Partnership	Babbacombe Sailing Club
Barton Willmore Partnership	Baby Bouncers Community Gymnastics
Berry Head Hotel	Barton Baptist Church
Beverley Holidays	Blatchcome Community Partnership
Bloor Homes	Blind Veterans
Bowrain Construction	Blue Cross
Boyer Planning	Boost Torbay
Bradley's Land Dept.	British Red Cross
Brixham Chamber of Commerce	Brixham Activity Services
Brixham Community Partnership	Brixham Baptist Church
Brixham Express Ltd	Brixham Blind and Visually Impaired Club
Brixham Peninsula Neighbourhood Forum	Brixham Does Care
Brixham Town Council	Brixham Museum
Building Research Establishment	Brixham Roman Catholic Church
Campaign for Real Ale (CAMRA)	Brixham Youth Enquiry Service
Cavanna Homes	Cara Community
CB Design	Cats Protection League
Charles Blake & Associates	Central Church Torquay
Chillcott's	Centre Peace
Christopher Curtis Associates	Cerebra
Christopher Stacey Architecture	Chelston Action Group
Churston Galampton & Broadsands Community Partnership	Chelston Community Centre
Clifton & Maidenway Community Partnership	Chicks Childrens Charity
Coal Authority	Children's Hospice South West
Coastal Windows & Conservatories UK Ltd	Children's Society
Cockington Village Residents Association	Choice Helps Families
Cockington, Chelston and Livermead Community Partnership	Upton Vale Church
Coffinswell Parish Council	Friends of the Church Yard
Collier Planning	Churston Golf Club
Country Bus	Churston, Galpmtton and Broadsands Community Partnership
CPRE	Cinnamon Trust
Creative Torbay Residents and Visitors Services	Circus Torbay
Cross Country Trains	Community Care Trust

<b>List 1: (alphabetical) Via Torbay Council</b>	<b>List 2: (alphabetical) Via Community Development Trust</b>
Darren Simner Architecture	Contact a Family
Dartmoor National Park Authority	Contact the Elderly
Dartmouth Steam Railway	Cornwall and South Devon Boxer Rescue
Deeley Freed Estates Ltd	Creativity Centre
Design Solutions	Crohns and Colitis Group
Devon & Cornwall Business Council	Dance in Devon
Devon & Cornwall Constabulary	Dartington School of Social Enterprise
Devon & Cornwall Housing Association Ltd	Design Council
Devon & Cornwall Police	Devon Cruse
Devon Chamber of Commerce	Devon Essential Medical Services
Devon Conservation Forum	Devon Insight
Devon County Council	Devon Studio School
Devon Fire and Rescue	Devon Wildlife Trust
Devon Gardens Trust	Disability Support Torbay
Devon School of English	Divers Down
Devon Wildlife Trust	Down South
Disability Support Torbay	Eat that Frog
Dittisham Parish Council	Eddystone Trust
East Devon District Council	Ellacombe Community Partnership
EE	Fishermans Mission
EJW Architects	Fishstock
Ellacombe Community Partnership	Foxhole Community Centre
English Riviera Geopark	Foxhole Grace Baptist Church
English Riviera Tourism Company	Friends of Upton Park
Environment Agency	Friends of Victoria Park
Exeter City Council	Funding Torbay
Exmoor National Park Authority	Galmpton Residents Association
FirstPlan	Goodrington Action Group
Friends of Armada Park	Goodrington Methodist Church
Friends of the Earth	Goodrington, Roselands and Hookhills Community Partnership
Fulfords Land & Planning	Greenspace Forum
Galmpton Residents Association	Great Parks Community Centre
GL Hearn	Grenville House
Gladman Developments	Groundwork
Global Windows	Guide Dogs for the Blind
Goadsby & Harding Commercial	Hanover Housing Association
Goodrington, Roselands & Hookhills Community Partnership	Headway Devon
Graham T Thursfield MCIOB	Healthwatch Torbay
Great Western	Hele's Angels
Haldons Chartered Surveyors	Hookhills Community Centre

<b>List 1: (alphabetical) Via Torbay Council</b>	<b>List 2: (alphabetical) Via Community Development Trust</b>
Hallam Land Management	Huntingdons Disease Association
Halls (Worcester) LLP	I can do that
Heart of the South West LEP	Ibex Canoe Club
Hele and Lower Barton Community Partnership	Imagine Group (BME)
Highways Agency	In the Same Boat
Historic England	Independent Age
Home Builders Federation	Intercom Trust (LGBT)
Homes and Communities Agency	Jatis Project
Howden Court Hotel	Karing
Howes Architects	Land Society
Ian Hobson Design	Learn Direct
Inland Waterways Association	Leonard Cheshire Disability
Inox Group -SW Regional Office	Linx Youth
Intelligent Plans	Living Options
JLL	Lupton House
Kay Elliott Architects	MacMillan Cancer Support
Kents Cavern Ltd	Maidencombe Residents Association
Kingskerswell Parish Council	Make a wish
Kingswear Parish Council	Mare and Foal Sanctuary
Kirkwells Consultants	MASH Charity (Mutual Aid and Self Help)
LAL Torbay	Medway Centre
LGBT Group	Men Have Rights Too
Local Link	Mencap
Malcolm Kingdon Architectural Services	Multiple Scerosis South Devon
Marina Development Limited	National Trust
Marine Management Organisation	NSPCC
Marldon and Berry Pomeroy Parish Council	Oxfam
Martin Cox MBEng	Paignton Baptist Church
Member of Parliament	Paignton Canoe Club
Michael Bailey	Paignton Parish Church
Michelmore	Paignton Picture House
Mike Richards Architects	Paignton Regatta
MTA Architects	Paignton Sea Anglers
Narracotts	Paignton Swimming Club
National Association of Funeral Directors	Paignton Town Community Partnership
National Federation of Gypsy Liaison Group	Paignton Zoo
National Grid	Palace Theatre
Natural Devon - Local Nature Partnership	Parents Participation Forum
Natural England	Parkview Society

<b>List 1: (alphabetical) Via Torbay Council</b>	<b>List 2: (alphabetical) Via Community Development Trust</b>
Network Rail	People's Dispensary for Sick Animals
North Devon District Council	Pilgrim of Brixham
North Goodrington Action Group	Play Torbay
Northern Trust Ltd	Pluss
Office of Rail Regulation	Preston Baptist Church
Paignton Heritage Society	Preston Community Partnership
Paignton Neighbourhood Plan Forum	Pride of Brixham
Paignton Pleasure Cruises	Princes Trust
Park Holidays	Prison Advice and Care Trust
Parsons Brinckerhoff	Purple Angel
PCL Planning Ltd	Purple Initiative
Pegasus Group	Regard
Peluma Ltd	Riviera Christian Centre
Persimmon Homes	Riviera FM
planinfo	Riviera Life Church
Play Torbay	RNIB
Plymouth City Council	Roselands Community Church
Princess Theatre	Rotary Club
Rail Line Users Group	Rowcroft Hospice
Rainbox Café	Rural Racism Project
Rapleys LLP	Salvation Army
REACH and Ellacombe Parks	Salvation Army Brixham
Royal Society for the Protection of Birds (RSPB)	Samaritans
RPS Planning, Transport & Environment Ltd.	Sanctuary Housing
Safer Communities Torbay	Sandwell Community Caring Trust
Sanctuary Housing Association	Scope
Savills	Shared Lives South West
Scotts Meadow Project Group	Shekinah Mission
Sea Spray Restaurant	Shiphay and the Willows Community Partnership
Sea Torbay	Sing for your Life
Seaway Insurance	So Fly
Shiphay and the Willows Community Partnership	Sound Communities
Smiths Gore	South Devon College
South Devon and Torbay Healthcare NHS Foundation Trust	South Devon Gymnastics
South Devon AONB	South Devon Players
South Devon College	South Devon Relate
South Hams District Council	Speak Out Torbay
South West Trains	Sport Torbay
South West Water	St Anne's Community Centre

<b>List 1: (alphabetical) Via Torbay Council</b>	<b>List 2: (alphabetical) Via Community Development Trust</b>
South Western Ambulance Service NHS Foundation Trust	St Luke's Residents Association
Sovereign Housing Association	St Mary Magdalene Church
Sport England	St Marychurch and District Community Partnership
SSA Planning Ltd	St Mary's Church, Brixham
St Marychurch District Action Group Bay Blooms	Survivors UK
St. Marychurch & District Community Partnership	Swim Torbay
Stagecoach Devon Ltd	Sylvan Adventures
Stewart Ross Associates	Taekwondo Torbay
Stoke Gabriel Low-E Group	The Compassionate Friends
Stoke Gabriel Parish Council	The Haven
Stokeinteignhead Parish Council	Thera (Supporting people with a learning disability)
Strategic Land Partnerships	Top UK (the OCD and Phobias Charity)
Stratus Environmental Limited	Torbay Advice Network
Stride Treglown Ltd	Torbay Athletic Club
Strutt and Parker LLP	Torbay Befriending Service
Teignbridge District Council	Torbay Bipolar Group
Terence O'Rourke	Torbay British Sub Aqua Club
Tetlow King	Torbay CAB
The Beulah Holiday Apartments	Torbay Carnival
The Carey Arms	Torbay Civic Society
The Cavanna Group	Torbay Coast and Countryside Trust
The Gardens Trust	Torbay Gamblers Anonymous
The Grand Hotel	Torbay Gymnastis Club
The Osborne Hotel	Torbay Holiday Helpers Network
The Planning Bureau	Torbay Neighbourhood Watch
The Select Group Ltd	Torbay Older Citizen's Forum
The Theatres Trust	Torbay Sailing Club
Thompson & Gregory Property	Torbay Social Club for the Blind and Visually Impaired
Three	Torbay Street Pastors
Tor Homes	Torbay Theosophical Society
Torbay & Teignbridge Campaign for Rural England	Torquay Air Training Corps
Torbay and District Deaf Society	Torquay Chamber of Commerce
Torbay Business Forum	Torquay Golf Club
Torbay Care Trust	Torquay Museum
Torbay Civic Society	Torquay Town Centre Community Partnership
Torbay Coast and Countryside Trust	Torre Abbey
Torbay Community Development Trust	Tower House School
Torbay Development Agency	Victim Support

<b>List 1: (alphabetical) Via Torbay Council</b>	<b>List 2: (alphabetical) Via Community Development Trust</b>
Torbay District Labour Party	Vocal Advocacy
Torbay Greenspace Forum	Wellswood and Torwood Community Partnership
Torbay Hospitality Association	Whitley Wildlife Conservation Trust
Torbay Line Rail Users Group	Womens Network
Torbay Local Access Forum	Wren Music
Torbay Neighbourhood Watch	Young Devon
Torbay Property Management	Youth Enquiry Service Brixham
Torbay Social Club for the Visually Impaired	Youth Genesis
Torbay Voice	
Torquay Chamber of Commerce	
Torquay Connexions Information and Advice Centre	
Torquay Neighbourhood Forum	
Torquay Town Centre Community Partnership	
Torre Abbey Historic House & Gallery	
Torre and Upton Community Partnership	
Torrige District Council	
Totnes Town Council	
TravelWatch SouthWest CIC	
Turley Associates	
Vodafone	
Vodafone and O2	
WA Shearings	
Wales & West Utilities	
Walker Newton Architecture	
Wellswood & Torwood Community Partnership	
West Devon Borough Council	
Western Power Distribution (South West)	
WG Couldrey Son & Ptnrs	
Woodland Trust	
WYG	
Youth Parliament	
PLUS 46 OTHERS	

- 9a) Sent to all consultees by Torbay Council together with the Response Form (Appendix 10):

## PAIGNTON NEIGHBOURHOOD FORUM

- Blatchcombe
- Clifton with Maidenway
- Goodrington, Roselands & Hookhills
- Paignton Town
- Preston



**Paignton  
neighbourhood  
plan**

c/o 34 Totnes Road  
Paignton  
TQ4 5JZ

13 April 2017

Dear Consultee

**Paignton Neighbourhood Plan Draft – Formal Consultation**

I am writing to inform you that the Paignton Neighbourhood Forum is consulting on the Paignton Neighbourhood Plan (Regulation 14 Pre-Submission and Publicity version) for a six week period **from 10am Wednesday 19 April until 5pm Wednesday 31 May 2017.**

This letter and the attached Response Form have been sent to you via Torbay Council on behalf of the Forum. Please be assured your contact details are retained on the Council's planning consultation database and have not been shared with the Forum.

If you wish to give views, they will be most welcome.

It would be most helpful if you could use the attached Response Form to send your views by any of the ways indicated on the Response Form attached.

If you choose to print out the Form for your use, can you please ensure the pages are stapled together before they are returned.

If you require any further information, please let me know on 01803 523434 or by email to [info@paigntonneighbourhoodplan.org.uk](mailto:info@paigntonneighbourhoodplan.org.uk)

Yours sincerely

*David Watts*

David Watts  
Chairman, Paignton Neighbourhood Plan Forum

Page 1 of 3

- 9b) Sent to all consultees by Torbay Community Development Trust together with the Response Form (Appendix 10):

## PAIGNTON NEIGHBOURHOOD FORUM

- Blatchcombe
- Clifton with Maidenway
- Goodrington, Roselands & Hookhills
- Paignton Town
- Preston

The logo for the Paignton Neighbourhood Plan features three interlocking puzzle pieces in blue, orange, and white, with a yellow sun icon above them. To the right of the puzzle pieces, the text "Paignton Neighbourhood Plan" is written in a bold, sans-serif font.

c/o 34 Totnes Road  
Paignton  
TQ4 5JZ

13 April 2017

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Yours sincerely

*David Watts*

David Watts  
Chairman, Paignton Neighbourhood Plan Forum

Page 1 of 3

## Appendix 10

### Response Form (online and in hard copy)

#### RESPONSE FORM



#### What is the Draft Neighbourhood Plan ?

Local residents, workers, businesses, councillors and other volunteers have produced the Draft Neighbourhood Plan for Paignton by working together as a Forum. This has been made possible by the Localism Act 2011. When finalised, the Neighbourhood Plan will become part of the statutory development plan for Paignton used by the Council when making decisions on planning applications in the area over the next 20 years.

The Draft Plan is based on the objectives our community has said it wants to see achieved. Details of the previous stages and views expressed are shown in the Community Involvement and Consultation document that accompanies the Draft Plan

#### Please use this form to comment on the Draft Neighbourhood Plan

Before completing this response form please look at the document set produced. A set is available to inspect at Paignton Library and Information Centre, at any of the events being held and information points and on the Forum's website address below.

Then complete this form and return it to any of the following points **before 31st May 2017**:

- By placing in the collection box at Paignton Library and Information Centre
- By hand to a Forum representative at any of the meetings or information points
- By post to Paignton Neighbourhood Forum, c/o 34 Totnes Road, Paignton TQ4 5JZ
- By scanning and emailing to [submissions@paigntonneighbourhoodplan.org.uk](mailto:submissions@paigntonneighbourhoodplan.org.uk)

Or if you wish to reply on-line, find out more, or join the Forum, please visit our website at [www.paigntonneighbourhoodplan.org.uk](http://www.paigntonneighbourhoodplan.org.uk) or telephone **01803 469185** or **01803 523434**

To ensure we are able to take your comments fully into account, please complete the following:

**Your Name (or organisation):** \_\_\_\_\_

**Address:** \_\_\_\_\_

**Postcode:** \_\_\_\_\_ **Telephone:** \_\_\_\_\_

**Email:** \_\_\_\_\_

**Question 1: Do you support the draft plan proposed ?**  Yes  No

Please give the reason for your answer in the box below and continue on the back of this form.



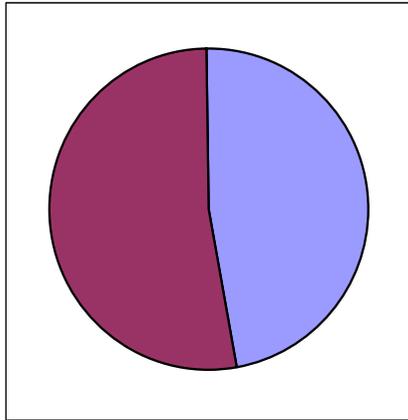
## Appendix 11



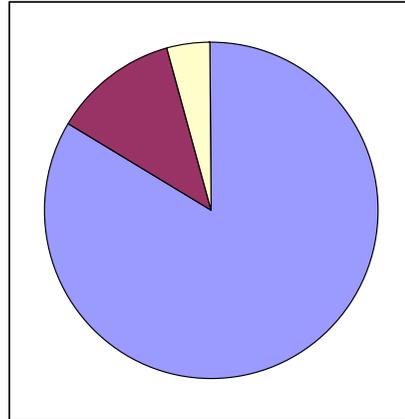
### STAGE 3 PRE-SUBMISSION CONSULTATION RESULTS AND RESPONSE TO SUBMISSIONS RECEIVED (Regulation 14 Stage)

19 APRIL – 31 MAY 2017

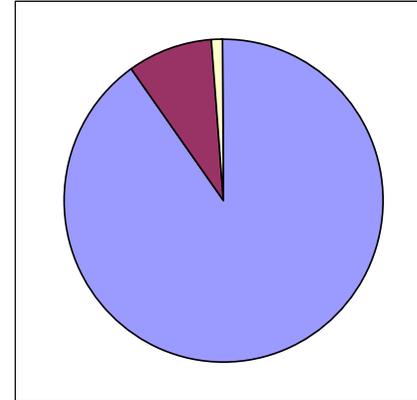
## A few headlines



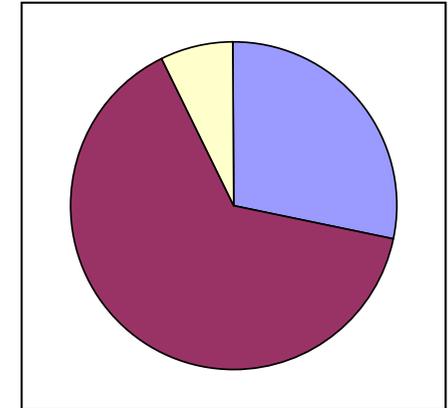
**Responses**  
 204 Written Submissions from  
 192 Respondents  
 45% Online 55% Direct



**Voter in Paignton**  
 84% Yes 12% No  
 4% Not answered

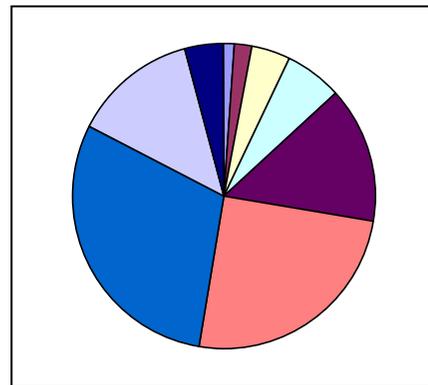


**Do you support the draft Plan proposed ?**  
 90% Yes 8% No  
 1% Not answered

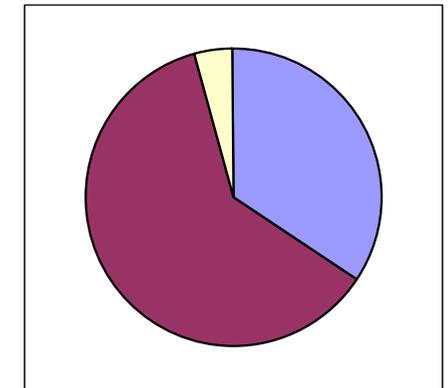


**Any changes you wish to see ?**  
 28% Yes 64% No  
 8% Not answered

0-16	1%
16-24	2%
25-34	4%
35-44	6%
45-54	14%
55-64	25%
65-74	30%
75+	13%
Not answered	5%
<b>Total</b>	<b>100%</b>



**Final document cover colour preferred**  
 34% Blue 61% Green  
 5% Not answered



**Age Group of Respondents**

# Contents

This Appendix shows the Pre-Submission consultation results received in full. They are shown in alphabetical order by each group listed and include where change to the Plan has been made as a result. Personal details of individuals have been redacted.

	<b>Respondents</b>	<b>Page</b>
<b><u>Individuals</u></b>		
Appendix 11(a) - Supporting the draft Plan	150	67
Appendix 11(b) - Not supporting the draft Plan	14	107
Appendix 11(c) - No preference stated	2	121
<b><u>Organisations</u></b>		
Appendix 11(d) - Supporting the draft Plan	9	124
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<b><u>Statutory Bodies</u></b>		
Appendix 11(g) - All	6	185

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A146	A	There are areas that could be improved. However the main plan to put employment as a priority over more development is important. To rejuvenate existing properties is also important before new sites are developed.	–	Support and reason noted.
A122	A	A great deal of work has been put into this proposal and it would appear to be sympathetic to conserving the area in general and benefiting the residents.	–	Support and reason noted.
A162	A	More need to be held to account for their decisions concerning our town	–	Support and reason noted.
A137	A	–	–	Support noted.
A022	A	The plan stops the overdevelopment of rural and urban areas of Paignton. Proven figures show there is no need for further development for the foreseeable future. Figures within the plan show there is no growth in this area and properties which are being built are so highly priced for a low income area.	–	Support and reason noted.
A136	B	Considered approach based upon job growth rather than housing growth whilst taking advantage of previous brown field sites to support housing needs.	–	Support and reason noted.
A139	B	–	–	Support noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A156	B	–	–	Support noted.
A083	B	<p><u>Regeneration of Oldway</u> - to be used as a museum, art gallery and a place for music and performing arts productions for both locals and tourists to enjoy. <u>Regeneration of Crossways</u> - new shops and a supermarket (a M&amp;S foodhall would be a nice addition). <u>Regeneration of the Old Town of Paignton</u> - encourage independent shops and restore run-down buildings. <u>Preservation of all parks in Paignton</u>, <u>Regeneration of Torbay Road</u> - make it look more attractive and well cared for, for visitors to the town.</p>	<p>6.86 Policy PNP11, page 41 - please add a clause to pedestrianise Well Street to help preserve this Conservation Area. If it cannot be pedestrianised, then can HGV's and coaches be banned from using this road ? I would also request improved signage for this road being a 20 mph zone to reduce speeding dramatically !</p>	<p>Support and reason noted.</p> <p><b>Agreed</b>, the Well Street concern needs help to progress a solution via the Local Transport Plan or other ways.</p> <p>Amend PNP11 d) text to read:  “ .....<b><i>and improvement of residential amenity in Well Street</i></b>; .....”</p> <p>(see similar requests below Appendix 11(a) Submission A088, A085, A039, B013),</p>
A080	B	<p>This is extremely comprehensive and highlights the need to maintain green spaces in the town and to focus more on redevelopment of existing areas / brown sites. It also highlights the need to improve tourist and resident facilities, such as more public toilets at station and square and seafront areas. Bus / train hub is very well placed and should stay put. Clean-up of block opposite station is desirable as is general flora attractions in Winner Street and Victoria Street. Crossways must be demolished and fresh start on site - residential ?</p>	–	Support and reason noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A012	B	Having attended many Forum meetings over the last few years I realise the hard work carried out by the chairman and other Forum members to produce this excellent plan. Adoption of the Neighbourhood Plan will ensure a positive improvement in Paignton for present and future residents and tourists.	–	Support and reason noted.
A166	B	–	–	Support noted.
A050	B	Fully support the Paignton NP. Excellent, clear documents and photography, maps. Puts the Council to shame - and all this done by volunteers.	–	Support and reason noted.
A066	B	Very well argued. Impeccably supported with hard evidence. Very much time, expertise and intelligent knowledge has gone into the compilation of this document.	PNP11 - Wholly endorse the commitment to enhancing and promoting the built historic heritage of Paignton. I strongly emphasize the need to capitalise on the <u>existing assets</u> of Paignton and so strengthen and sustain its tourist based economy. This is its future and enables the town to attract a wider and different visitor interest. I would agree that its potential in this respect is currently seriously neglected.	Support and reason noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A101	B	<p>I entirely endorse the Plan's emphasis on the environmental and heritage attributes of the area, and the recognition of how this crucially influences the quality of life of residents and the quality of holiday experience for visitors (C1+C Consultation Draft, 11.31 etc.). As such the assets identified are shown to underpin the tourist-based economic sustainability of the area. (The term 'sustainability' is here correctly defined as the preservation and enhancement of the assets and environmental resources on which the future stability and prosperity of the district depends, in opposition to the finance-driven short-termism currently favoured by the Council). In its meticulous supportive evidence, Paignton's Neighbourhood Plan supplies clear statistical evidence of the incompatibility of housing projections and actual population growth and job creation (SE Consultation Draft, p. 12-14, Appendix 1; Population Change - Actual and Predicted, p. 31-32); it rightly states that development must be proportionate to proven local need and downscaled if growth predictions are not fulfilled (SE Consultation Draft, 2.4.7, p. 14). The document correctly emphasises the need for rigorous habitat assessments to precede any development of noted landscape or wildlife value (Part 4, SA + HRA) and for brownfield alternatives to be sought first in preference to greenfield sites</p>	–	Support and reason noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
		<p>(Consultation Draft Plan, Part 6, p. 51 - etc). It rightly acknowledges the need to respect the critical drainage status of such places as Collaton St. Mary and consequently to allow only limited and appropriate development in this vulnerable area (Policy PNP 24, Consultation Draft Plan, page 61; 3.31, SA + HRA Consultation Draft). The entire document shows professional rigor and an impressive command of facts combined with a respect for the character of the area which carries authority and deserves to be accorded legal status.</p>		
A067	B	<p>The emphasis on jobs led growth is correct. Particularly with reference to tourism and high-tech jobs which have low impact, and can help preserve, the rural character of the area.</p>	–	Support and reason noted.
A130	B	<p>It is a well researched, well thought out, realistic plan giving clear guidance for the future development of Paignton. The sooner it can be in force the better.</p>	<p>Minor amendment: Figure 6.8 of Paignton on page 46 points to the Apollo. That cinema chain was taken over by Vue a few years back, and to add clarity I would suggest the amendment says 'Vue Cinema'. Thanks</p>	<p><b>Agreed</b>, amend Fig 6.8 reference to read:  <b><i>“Vue Cinema (Formerly Apollo)”</i></b></p>
A102	B	<p>The prospect of preserving green spaces. Houses to be built when and where necessary.</p>	–	Support and reason noted.
A133	B	<p>Linking jobs to homes and population increase, preserving green spaces which make Paignton a more pleasant place to visit and live in. Allowing all of Paignton residents a chance to air their views and help to plan for a happier and better environment.</p>	–	Support and reason noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A105	B	It seems to be a sensible route to grow business in Paignton. There is no point in building houses if the employment is not there for workers to fill the houses.	I'd like to see "Old Town", in particular Winner Street, policed more frequently, cleared of HMO's and generally cleaned up.	Support and reason noted. Police patrolling and clearing away HMOs are not deliverable by the Plan – no change is appropriate.
A116	B	I think this plan provides a well-thought-out long-term view of Paignton's needs. I like the strategies of matching housing increases with employment opportunities and the preservation of green spaces for the benefit of local communities.	–	Support and reason noted.
A120	C	If we don't plan for the future, Paignton is dead in the water.	–	Support and reason noted.
A011	C	–	–	Support noted.
A149	C	There has been local consultation of this plan throughout its formation. It seeks to enhance our town and the natural environment which attracts visitors. It seeks to develop the job opportunities to help local residents and businesses prosper. It does not support blanket unsustainable development and huge numbers of green field developments which will have a detrimental effect on rare local species. I hope that it will have a positive effect on the seemingly indiscriminate building of housing estates being passed by Torbay Council.	PNP 23 figure 6.12 - The borders of the Yalberton Valley are at times wide and other places very narrow. Can these borders be reassessed and a made more uniform dimension? - So that the valley is all protected.	Reason for support noted.  The boundary shown in PNP23 results from the Local Green Space assessment made, which links into element a) of PNP23. The wider Valley area falls within the scope of Policy PNP19 which has as its objective protecting and enhancing the Valley as shown in associated Figures 6.10 and 6.11 – no change necessary.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A148	C	Because, as a result of many years of careful and detailed consideration and consultation, it has made reasoned and balanced proposals which incorporate the need for development, together with the focused concerns of local people when proposed development threatens their needs and priorities. It also harmonizes the dynamics of 'localism' in examining the range of practical possibilities, while insisting on the retention of a high quality environment for residents.	Figure 6.12, PNP 23. The boundary should include the historic listed buildings of the Lower Yalberton hamlet. Perhaps the boundaries of the Yalberton Valley should be reconsidered as they seem arbitrary, sometimes wide, sometimes narrow.	Support and reason noted.  The response above (A149) applies here also to the "issue raised".
A121	D	An improved heritage offer is important for tourism, which is a major source of employment.	–	Support and reason noted.
A023	D	I totally agree the plan should be jobs led. Jobs first then houses.	–	Support and reason noted.
A024	D	I agree with the proposed plans. Employment must be the priority.	–	Support and reason noted.
A111	D	Green spaces protected.	–	Support and reason noted.
A065	E	–	–	Support noted.
A074	E	It is about time that Paignton was made attractive for tourists of all ages. Opening Oldway Mansion would help make money to restore it. Contact someone like Richard Branson, or Prince Charles, Prince Harry.	–	Support and reason noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A076	E	<p>Apprenticeships to be brought back for trades possibly starting with 1 day a week release from school at the age of 16 years. Homes which are affordable for everyone taking into account wages in the area. Help employers to be able to afford higher wages. Encourage holiday makers to come to Paignton by doing guided tours around the Old Town with disabled people in mind, offer wheelchair or light weight mobility scooters, price to be added to cost of tour. Stricter control on Council spending, independent co. to check costs i.e. developers costs rising !! Council to make more use of empty houses e.g. Tweenaway 2 houses empty for over 10 years. Re-open Oldway Mansion to make money. Apply to Lottery Commission for funds to renovate Rotunda and swimming pool for children with a small charge. Parkfield to have locked gates taken away and more incentives to hold BMX and skateboard meetings similar to BMAD. Dog friendly areas for locals, beach 7pm-8am all year.</p>	–	Support and reason noted.
A075	E	<p>Paignton has been stagnant for far too long and a lot of overlooked potential is falling behind the times (e.g. shops, bins, pavements and roads). A lot is being done for tourism but not for the residents of Paignton (i.e. shops).</p>	–	Support and reason noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A077	E	Dogs to be allowed on all beaches during seasonal time during the hours of 19:00 to 07:00am.	–	Support noted. Dog access to every beach as suggested would conflict with attracting those tourists who would want a dog free beach – no change is appropriate.
A003	E	Good for the town and people. Improves amenity and surroundings.	–	Support and reason noted.
A031	F	–	–	Support noted.
A015	G	It has been planned for the people by the people of the area, taking into consideration of resident's wants and needs and for the countryside / farming / environment.	–	Support and reason noted.
A038	G	From what I can see, this is an extremely well thought out plan - taking into account the fundamental requirements of the town such as flood defence, work, housing, regeneration etc. I have lived in Paignton for 7 years and very much appreciate the improvements which have already taken place i.e. the new library etc. Crossways area / Winner Street/ Church St badly need attention, though there has recently been encouraging signs of this - the station - where people first arrive and walk creates a lasting !! impression !! Apollo Cinema - yes. Let's please continue with these plans for making Paignton realise its full potential. Thank you to the team for all works involved.	–	Support and reason noted.

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ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A165	G	Tries to protect the prettier parts of Paignton.	–	Support and reason noted.
A054	G	–	–	Support noted.
A138	H	–	–	Support noted.
A092	H	–	–	Support noted.
A160	H	<p>It has been produced by the people of Paignton, who know the town best, it includes the saving of our Green Spaces and some interesting policies that would help our town develop in a more eco-conscious way than it has done in the past, bringing exciting new thinking to how we develop while consciously planning for a less damaging future built environment . The valiant effort to include many of our precious green spaces, is essential to the future of our town, that even with careful foresight will suffer from the strain of the level of development required, these breathing spaces must be respected, and the neighbourhood plans seem to reflect what would have been my main concerns. Also maintaining/creating space for food production, thus creating jobs and supporting the need to grow local, shop locally is great forward thinking. The inclusion of segregated cycle routes where possible is necessary to cut the level of traffic already using very congested space,</p>	<p>It is essential that the plans include all the small woodlands we have remaining in Paignton, failure to do so will severely affect the biodiversity of the area and also further contribute to the decline in the positive attributes of our overall living space, woodland and trees add tremendous value to the quality of life for all, please also include the following: Butts Hill Copse; Ramshill Copse; Blagdon Woods. I ask this as a concerned lifetime local resident, and also as an active member of the Woodland Trust.</p>	<p>Support and reason noted.</p> <p>The “issue raised” is the subject matter of PNP1 Annex 1 and PNP19.</p> <p>See also below “Rams Hill Copse” under Appendix 11(d) Submission B013.</p>

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		and make way for a fitter healthier Torbay. So on the whole, thumbs up from me.		
A047	H	–	–	Support noted.
A044	H	–	–	Support noted.
A159	H	Somebody needs to keep Torbay Council and the developers in check.	Page 16 para 6.15 Unclear where Fig 6.1 is located (Fig 6.1 on page 23 does not seem to fit the bill!) Annex 1 to PNP1 1. Easier to reference if bullets labelled a) thru k) like Annex 2. 2. (Annex 1 continued next column) has not been applied to the bottom of the 2nd column, p20. Annex 2 to PNP1 Add to paras n) thru r) Minimum 2 parking spaces per household (rationale our close has over 35 vehicles per 17 houses). On modern developments parking in the road converts it to a one way street as there are no passing places, and no hilltop and ridge lines to be developed to preserve open views to attract and maintain tourism in Paignton and Torbay. Add new para w) p28 Where development necessitates new road infrastructure connecting cycle-ways and footpaths must be included. Para 6.118 Conclude paragraph with the inclusion of cyclists.	Support and reason noted. On “issues raised”:  <b>Agreed</b> , incorrect reference of (Fig 6.1) used – amend to read: “ <b><u>para.6.8</u></b> ”.  Referencing of bullet points as proposed would cause confusion with Policy text that takes priority – no change appropriate.  <b>Agreed</b> , add at page 20 “ <b><u>(Annex 1 continued next column)</u></b> ”  The Local Plan contains the applicable parking standards – no change appropriate.  PNP19 addresses the countryside matters raised .  <b>Agreed</b> , add to PNP1 – Annex 2 under last sub-heading new item to read: “xx) <b><u>include connecting cycleways and footpaths where development involves new road</u></b> ”

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				<p><b><i>infrastructure.....</i></b>”</p> <p><b>Agreed</b>, amend para. 6.118 to read:  <i>“...travel by commuters, schoolchildren, <b>cyclists</b> and tourists.”</i></p>
A179	H	1. It's good that the community has been involved with this draft plan. 2. The balance of new houses should be in proportion to new jobs being created. 3 Support is given to the idea of Local Green Spaces and the preservation of existing bio diversity.	More should be included to ensure the safety of walkers, cyclists and horse riders within the Yalberton Valley lanes and roads. Pinch points to restrict the size of vehicles and slow vehicles down would be welcomed.	Reason for support noted.  See response to Submission A176/A178 below.
A051	H	–	–	Support noted.
A019	I	–	–	Support noted.
A021	I	–	–	Support noted.
A174	J	It is very thorough, but I think that the infrastructure for a growing population will be tested regarding GP Surgeries, hospital provision, schools and transport for a predominately older population.	–	Support and reason noted. Provision of health facilities forms part of the Council's Section 106 and Community Infrastructure Levy requirements as appropriate – no change is necessary.
A032	J	Victoria Park is a focal point and enjoyed by many of all ages, it must not be allowed to be developed on.	–	Support and reason noted. Policy PNP9 addresses this - no change necessary.

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A126	J	<p>It's imperative to preserve our green spaces, particularly in urban and seafront areas. It's important for the Community to have its say when it comes to allocating spare land for new housing. The PNF have Members with expert knowledge of a wide range of issues relating to coastal flooding, existing sewerage and road infrastructure, drainage and downstream water courses, and these insights have been brought to bear when compiling Paignton's Neighbourhood Plan. The Neighbourhood Plan differs intrinsically from the Local Authority's Local Plan in that it is not influenced by financial or commercial considerations, particularly those relating to S106s, CILs and other local authority funding streams. The PNF is representative of a cross-section of Paignton's community and includes the views of local Green Party Members, trade unionists, farmers and those of a conservative political persuasion. An enormous amount of work and local research has gone into the production of the Neighbourhood Plan over the past two years.</p>	<p>I would like to have seen some mention of the contemporary need to encourage more mortgage-free, self-build opportunities, particularly for single, conscientious people who have not been able to become home-owners due to the impact of temporary contracting in recent decades. The days when people can take on 30 year, 100% mortgages and hope to meet their payments over a lifetime are long gone, apart from a very small fragment of the population. A mature Neighbourhood Plan would have acknowledged this important cultural trend, particularly given that we are planning for the next 20 years. There are a number of leading UK architects who have raised people's awareness of the opportunities to live mortgage or rent free thanks to new building innovations and adaptations. But many of us in rural areas feel we are being held back by earlier generation's sense of denial about housing options and tendency to live in the past. Clearly, there are vested interests in trying to preserve the status quo, particularly among buy-to-let landlords and those who have 'benefited' unfairly from unprecedented levels of house price inflation in recent decades. But, in the long-term, self-builds pose much less of a threat to rural prosperity than higher interest rates and inflation, which will be the inevitable consequence of this exploitative inertia in the end, anyway.</p>	<p>Support and reason noted.</p> <p>PNP1 item e) gives express support to a wide range of housing provision methods to help support meeting the "issue raised" – no change is needed.</p>
A164	J	<p>It is a very detailed plan well carried out with the needs of the future. It has also been carried out to ensure that as little damage as possible is done to the remaining area. It seems to take in the wishes of the majority of resident's views and needs. We need to make sure that</p>	<p>–</p>	<p>Support and reason noted.</p>

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		there are plans for going forward and that we do not just build housing, roads and provide facilities without looking at the whole picture. This plan has done just that and should be adopted to ensure we do not make changes in isolation in the future which will in the end prove costly and disruptive to future necessary changes.		
A053	K	–	–	Support noted.
A057	K	–	–	Support noted.
A036	K	–	–	Support noted.
A006	K	Local environment, heritage and jobs need much more support.	–	Support and reason noted.
A132	K	–	Annex 1 to Policy PNP1. Megafarms - mega relates to size, and it's highly unlikely that proposals for large farms covering 1000's of acres will come forward. With the aim being to avoid adverse social or environmental impacts and to encourage small scale (sustainable) farming methods, more specific wording is needed, possibly 'intensive livestock units'. In addition, the NP should include guidance as to the type and scale of agricultural buildings, including siting to minimise cumulative negative impact.	Support noted.  Mega-farms are defined in the Appendix 1 Glossary of Terms at the back of the Plan. Agreed that few proposals are likely where planning consent would be required. The intent of the policy is to make it clear such proposals would require very careful assessment.
A082	L	It nicely fills several large gaps in the Council's 'Local Plan'.	–	Support and reason noted.
A070	P	–	–	Support noted.

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A017	L	–	–	Support noted.
A016	L	–	–	Support noted.
A112	L	The Plan is an excellent future road map for everyone with an interest in the town and its surroundings – residents, visitors, developers, businesses and investors. It seeks to promote investment in the area, help guide new development to the most suitable sites, protect valuable assets, secure improvements of all kinds, give a continuing voice to the community, and promote a better quality of life for current and future generations.	–	Support and reason noted.
A004	L	The plan is based on original and ongoing surveys (SWOTS and consultation) of the Paignton neighbourhood community, so reflects the hopes and wishes of the local community for their neighbourhood - for Paignton.	–	Support and reason noted.
A176	L	This consultation version of the Paignton Neighbourhood Plan represents the scale and scope of community consultation entailed in its preparation and production. Paignton Neighbourhood Forum has recorded the hopes and fears expressed by members of the local communities consulted, and indicated their wishes for Paignton's future, in a plan prepared by very many community members separately and together contributing to single or multiple aspects. The plan emphasises	PNP 1 As an area-wide policy it should indicate particular features of policy that can be practically realised through specific pragmatic approaches. A network of cycle ways, lanes and paths can help achieve strategic economic, social and environmental aims, for reducing increasing overload on transport and water infrastructure, enabling employment use of decentralized sites without major road-building, improving surface drainage by incorporating water-permeable materials, be integrated with water-drainage management elements along roadsides, encourage and facilitate economic, social, physical and mental	Support and reason noted.  On “issues raised”:  <u>Footpath and Cycleway network</u> - PNP1c), PNP12, PNP22 and other parts of the Plan provide a sufficient policy steer in a land use role of a Neighbourhood Plan for more detailed transport proposals to be taken forward through the regular review of the Devon and

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		<p>Paignton's environment and ecology - its geology and geography, its landscape of rolling hills and secluded stream valleys, its rural character of fields and orchards, and its biodiversity - alongside its sociocultural and socioeconomic history and heritage from Saxon settlement to the railway's arrival, in attractiveness and attractions for several sorts of tourism and for high-tech industry and innovation, and training and education in environmental, outdoor and energy-efficiency fields. The plan shows clearly that appropriate recognition and adequate safeguarding of Paignton's natural and cultural assets, with realization of capacity constraints inherent in its geology and geography, is the only way to preserve and enhance environmental and economic sustainability, in continuing to attract tourism and industry to provide sustainable well-paid work for Paignton's residents and enhance the economic, social and ecological environment for local communities and visitors to enjoy in abundance.</p>	<p>well-being, enhance the landscape and enable resident, visitor and tourist access, and provide construction work and sustainable retail opportunities.</p> <p>While cycle and footpaths and/or networks are mentioned in various policies, an overall policy for sustainable and safe travel by foot and/or cycle or other wheeled HPV is not clearly identified, and the contributions such a network could make to realizing many of PNP's strategic aims is not clearly indicated.</p> <p>It is difficult to see where an area-wide cycle network policy could be inserted into either/both area-generic and -specific policies, but PNP 1 b), c) and j) allow mention of b) sustainable solutions in relation to infrastructure needs c) including sustainable travel and j) low carbon [...] commuting, which in indicating the importance of sustainable transport might open the way for more consistent and prominent mentions of it in subsequent policies. b) new employment development on sites able to meet infrastructure needs by sustainable solutions with biodiversity enhancement; c) taking particular advantage of the scope for jobs engaged in decentralised locations to enable sustainable travel, involve new technologies, and will assist moving towards a low carbon economy. j) enhancement of local identity, heritage features, renewable and low carbon energy, construction and commuting solutions, with all development required to comply with the Design Guide in Annex 2;</p>	<p>Torbay Joint Local Transport Plan and at planning application stage.</p> <p>To assist this, the Neighbourhood Plan can be strengthened by the following change to draw attention to the role that such more sustainable forms of transport would have in supporting the land-use objectives of the Neighbourhood Plan:</p> <p><b>Agreed</b>, add text at PNP1 first paragraph to read:</p> <p><i>“...In all parts of the Paignton Neighbourhood Plan Area a balanced delivery of growth, <b><u>biodiversity enhancement and more sustainable means of travel</u></b> will be supported by:.....”</i></p> <p>(For note: the addition relating to biodiversity enhancement arises from the submission by Natural England - see Appendix 11(g) below at C006).</p>

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A178	L	<p>Reasons for support already stated in previous submission to consultation: mainly that PNP provides evidence-based deliverable policies and plans for a sustainable future for Paignton, drawn from the views, hopes and wishes of members of Paignton's communities for the protection and enhancement of Paignton's employment and economy, social culture, and natural and built environment.</p>	<p>Previously submitted suggestions for additions and/or amendments to PNP 1, that could represent the potential of a sustainable travel and transport network through, across and around Paignton, for helping to achieve many of PNP's aims and policies for economic, ecological and environmental sustainability, in regard to facilitating immediate employment opportunities in existing decentralised sites without advance major road construction, supporting sustainable use of existing infrastructure for drainage while mitigating development and urban creep by incorporating permeable-surface cycleways and road-edge cycle lanes to provide water-management systems that can assist in attenuating road surface water storm event capacity issues, using planting that can improve air quality, at the same time contributing to restoration of Paignton's historic character as a garden town connected through networks of paths and lanes.</p> <p>Having submitted brief suggestions for rewording of PNP 1, submitting the review of PNP policies out of which the suggestions emerged seems sensible, insofar as in indicating the range of references to cycle path networks, it may also indicate the potential salience and viability of incorporating an area-wide policy for foot and cycle networks to address PNP's main aims. This document is copied and pasted below. My interest in local neighbourhood planning reflects hopes for development of an effective foot- and cycle-path network to enable access to local education, employment and amenities using sustainable, healthy, safe and fun transport means and modes, especially including people's own human power.</p>	<p>Support and reason noted.</p> <p>(For note – this submission (A178) expands on the previous submission above (A176) by the same respondent. Duplicated text, where submitted, has not been removed in order to maintain the accuracy of all submissions received and documented in this Appendix.</p> <p>The response above (to A176) therefore applies to this submission also.</p> <p>As above.</p>

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			<p>The current submission to the consultation intends to show that a cycle/footpath network would contribute strategically to realisation of many PNP aims, and to provide examples and explanations to assist incorporation if and where feasible and useful, into a post-consultation review of PNP. In recording and representing local community aspirations and national policy aims to achieve economic, social and environmental sustainability, enhance Paignton's historic heritage and realise its 'garden town' potential, PNP offers unique opportunities to restore a foot-and cycle-based connectivity that once would have characterised movement around the town and between town and country.</p> <p>Footpaths and cycleways are mentioned in several parts and policies of PNP, but in an inconsistent and subordinate capacity. The strategic role of development of a foot/cycle network in helping to realise the central main aims of PNP as represented in PNP1 and annexes - more jobs, more homes, protecting local identity, sustainable balance and design - could receive emphasis in its own right. An effective foot/cycle network could help protect local identity, assist in achieving low carbon and air quality goals, increase infrastructural sustainability (re surface water drainage), and improve physical and mental health. PNP1 is an Area Wide Policy, so is probably the most suitable policy into which to insert an area-wide requirement and agenda for providing a network of foot/cycle-ways in implementing specific policy elements and aims; a similar approach could be adopted for PNP1 and annexes, and in other policies.</p>	<p>As above.</p>

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			<p>Given reports of community comments reflecting wider perceptions of a need for foot/cycle networks, it might be possible and sensible to integrate the various 'mentions' into a comprehensive policy addition, or devise another means of highlighting the importance of foot/cycle network for realising PNP aims.</p> <p>Additions could be made to PNP 1 sections on jobs and sustainable design, and to Annexes 2 and 3. To make our town and surroundings more attractive to tourists and an outstanding place to live and work - Policy PNP1– Area Wide Policy: In all parts of the Paignton Neighbourhood Plan Area a balanced delivery of growth will be supported by: More jobs: Priority will be given to securing job led growth by supporting a net increase in permanent full time well paid jobs through: a) more intensive use of existing employment locations to achieve 'spaceless' growth; b) new employment development on sites able to meet infrastructure needs and biodiversity enhancement; c) taking particular advantage of the scope for jobs engaged in decentralised locations that reduce travel needs, involve new technologies, and will assist moving towards a low carbon economy. More homes: Housing growth appropriate to meet local needs, including affordable housing, will be supported through: d) bringing back into use existing homes that have been vacant for 6 months or more; e) a provision of net additional homes achieved by a wide variety of supply that includes conversions, more efficient use of vacant buildings in all use classes, self build, and encouraging community housing enterprises wherever possible; f) discouraging the provision of houses in multiple occupation (HMOs) where they would adversely affect</p>	<p>As above.</p>

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			<p>the tourism offer, worsen concentrations of deprivation, create conditions of community conflict, or conflict with the Article 4 Direction produced by the Council.</p> <p>Protecting Local Identity Ensuring that key areas of rural landscape, Local Green Space, and food production are safeguarded and enhanced to ensure an uplift in tourist appeal, enhanced biodiversity and community well being by: g) applying the policies of Annex 1 to all development proposals that may affect these areas. Sustainable balance and design Ensuring a balanced provision of new development at all times through: h) job led growth and housing provision being kept in balance by regular (annual) reviews; i) population growth and food retail floorspace additions being kept in balance at all times; j) enhancement of local identity, heritage features, renewable and low carbon energy and construction solutions, by all development being required to comply with the Design Guide in Annex 2; and, k) details that accord with Annex 3 of proposed foul and surface water drainage and other key infrastructure being required when development applications are first submitted, and not being dealt with subsequently by conditions. Proposals that achieve a) to k) will be supported and those that conflict will be treated as a departure that can expect to be refused. Additions and amendments are suggested for b), c), and j) to indicate the potential for sustainable travel and transport infrastructure especially including cycle networks to enable achievement of strategic aims. Illustrative examples of proposed additions and/or amendments can show possible wording for insertions.</p> <p>Examples maintain identical columnar layout and</p>	<p>As above.</p>

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ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
			<p>spacing to minimise whole-document-page alterations. b) new employment development on sites to meet infrastructure needs with sustainable solutions and biodiversity enhancement; c) taking particular advantage of the scope for jobs engaged in decentralised locations to enable sustainable travel, involve new technologies, and assist in moving towards a low carbon economy. j) enhancement of local identity, heritage features, renewable and low carbon energy, construction and commuting solutions, with all development required to comply with the Design Guide in Annex 2; and, PNP 1 In all parts of the Paignton Neighbourhood Plan Area a balanced delivery of growth will be supported by: More jobs: Priority will be given to securing job led growth by supporting a net increase in permanent full time well paid jobs through: a) more intensive use of existing employment locations to achieve ‘spaceless’ growth; b) new employment development on sites able to meet infrastructure needs and biodiversity enhancement; c) taking particular advantage of the scope for jobs engaged in decentralised locations that reduce travel needs, involve new technologies, and will assist moving towards a low carbon economy. More homes [...] Protecting local identity [...] Sustainable balance and design: Ensuring a balanced provision of new development at all times through: h) job led growth and housing provision being kept in balance by regular (annual) reviews; i) population growth and food retail floorspace additions being kept in balance at all times; j) enhancement of local identity, heritage features, renewable and low carbon energy and construction solutions, by all development being required to comply with the Design Guide in Annex 2;</p>	<p>As above.</p>

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			<p>and, k) details that accord with Annex 3 of proposed foul and surface water drainage and other key infrastructure being required when development applications are first submitted, and not being dealt with subsequently by conditions.</p> <p>PNP 1 could make further specific mention of cycleways, cycle lanes and cycle paths as a means to:</p> <p>(a) enable more intensive but much safer use of roads and pavements, in a nearly spaceless growth of transport infrastructure (b) enable new employment to be developed on sites able to meet some infrastructure needs without the need for major road construction in advance or potentially even at all, and so enhancing biodiversity (c) take advantage of the scope for jobs in decentralised areas so reducing travel needs and major road-building, engaging new travel and transport technologies, and assisting in moving towards a low carbon economy. In Annex 2, in the context of local food, cycle and footpath networks are mentioned, however, only as occasion for a network of edible hedgerows, and with reference to minimising conflicts between traffic and cyclists or with pedestrians: "e) the creation of a network of dual purpose edible hedgerows throughout new cycle and footpath networks to provide food and help minimise conflicts between traffic and cyclists or with pedestrians". For Annex 3, cycle paths/ lanes along road edges, with permeable surfaces and lane demarcation planting, could contribute to sustainable drainage aims.</p>	As above.
A005	L	–	–	Support noted.

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ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A173	L	Very thorough	PNP23 Add specific instruction to prevent Torbay council from reopening or using Yalberton Quarry in any way. PNP23 Add statement to protect and improve the surface of Lidstone Lane to promote environmentally friendly access. PNP23 Add specific statement to link Lidstone Lane to nearby South Devon College by designating it as a cycle path.	<u>Yalberton Quarry</u> - Neighbourhood Plans are prohibited by legislation from including policies that relate to mineral working (Basic Conditions Statement paragraph 3.8). <u>Lidstone Lane</u> – see response to A176/A178 below that applies here also.
A163	L	As a past business owner in Paignton and member of the BID committee I am fully aware of the brick walls and lack of funding the town has come up against. Also as an artist I am hugely disappointed at the total lack of facilities for artisans and cultural needs	Unable to open document but I have clear ideas for change. My main issues are: lack of facilities for art and culture e.g. workshops, gallery, lack of understanding the connection between parking charges and facilities with tourist/shopper length of stay in town. E.g. a family of 4 will find parking charges every day eating into their hard earned holiday money. It's much cheaper to go to other towns like Teignmouth where charges are half. Business rates and rentals do not equate to facilities nor do they follow realistic costs.	Support and reason noted.  On the cultural / arts issue raised, See response below (Appendix 11(b) Submission B105) that applies equally here.
A084	M	Regeneration of 'Old Paignton'. Maintaining all green spaces. Regeneration of Station Square. Promoting Tourism.	–	Support and reason noted.
A055	M	–	–	Support noted.
A056	M	–	–	Support noted.
A009	M	–	–	Support noted.

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ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A008	M	–	–	Support noted.
A007	M	–	–	Support noted.
A088	M	Protect Paignton's green spaces and history and protect Paignton's identity.	6.86 add new paragraphs to Policy (G) to pedestrianise Well Street and stop off at Well Street / Cecil Road junction. H) to save green spaces both sides of Cecil Road near Well Street as Local Green Space.	Support and reason noted.  <b>Agreed</b> , the Well Street concern needs help to progress a solution via the Local Transport Plan or other ways. Amend PNP11 d) with text to read:  <b><u>“ .....and improvement of residential amenity in Well Street; .....”</u></b>  (See similar requests and same change above at Appendix 11(a) Submission B083).
A085	M	Protect Paignton's green spaces and help protect Paignton's identity.	6.86 Policy PNP11 page 41 - add new paragraphs to Policy G) pedestrianise Well Street and stop off* at Well Street / Cecil Road junction. H) save greenspaces both sides of Cecil Road near Well Street as Local Green Space. (* petition to permanently close Well Street in 2014 from Colley End Road entrance was signed by over 40 residents.)	Support and reason noted.  See amendment above (A088) which applies here too.

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A152	M	An awful lot of work has gone into the plan and I would like to think many wishes were taken into account. We can't say no to everything so have hopefully identified acceptable areas for development.	The plans to build in The Great Parks, King's Ash and Collaton St.Mary areas which are green field sites, or in the case of Great Parks woodland, should be reviewed. The area in which they lie is a beautiful valley or couple of valleys. Instead of being earmarked for building upon, the area should be redesigned as a SSSI. If encroachment continues westward as it has done to QED and in such a tasteless way to Blagdon Barton and along the Totnes Road the special environment of the Blagdon valley will be completely lost as it has been in the Yalberton valley.	Support and reason noted.  This will be a matter for the Local Plan 5-yearly Review to decide which is required to take place in 2020 in accordance with the adopted Local Plan. In the meantime, the Local Plan makes it clear that development of these locations can only be approved if the infrastructure and legally protected habits issues are resolved satisfactorily.
A155	M	It's taken a lot of work and was a good idea to ask the locals.	The plans to build in The Great Parks, King's Ash and Collaton St.Mary areas which are green field sites, or in the case of Great Parks woodland, should be reviewed. The area in which they lie is a beautiful valley or couple of valleys. Instead of being earmarked for building upon, the area should be redesigned as a SSSI. If encroachment continues westward as it has done to QED and in such a tasteless way to Blagdon Barton and along the Totnes Road the special environment of the Blagdon valley will be completely lost as it has been in the Yalberton valley.	Support and reason noted.  As above for Submission A152.

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A154	M	It's good idea.	The plans to build in The Great Parks, King's Ash and Collaton St.Mary areas which are green field sites, or in the case of Great Parks woodland, should be reviewed. The area in which they lie is a beautiful valley or couple of valleys. Instead of being earmarked for building upon, the area should be redesigned as a SSSI. If encroachment continues westward as it has done to QED and in such a tasteless way to Blagdon Barton and along the Totnes Road the special environment of the Blagdon valley will be completely lost as it has been in the Yalberton valley.	Support and reason noted.  As above for Submission A152.
A153	M	Because it a great idea to ask the local people to air their views and offer opportunities rather than saying no to everything.	The plans to build in The Great Parks, King's Ash and Collaton St.Mary areas which are green field sites, or in the case of Great Parks woodland, should be reviewed. The area in which they lie is a beautiful valley or couple of valleys. Instead of being earmarked for building upon, the area should be redesigned as a SSSI. If encroachment continues westward as it has done to QED and in such a tasteless way to Blagdon Barton and along the Totnes Road the special environment of the Blagdon valley will be completely lost as it has been in the Yalberton valley.	Support and reason noted.  As above for Submission A152.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A171	M	We welcome the reinforcement of the need to conserve and protect the rural character areas (PNP1). To the extent that the proposed Neighbourhood Plan provides more protection against inappropriate development than does the current Torbay Local Plan, we support the objectives of limiting new development to those which are consistent with the objective of retaining the existing rural character of the identified areas. (PNP19)	In PNP19 the control on development states that only "development proposals that prevent this policy from being achieved will not be approved." Given the sensitivity of the areas identified in PRP 19 where objectives are in most cases to conserve the status of the land (and in others either to enhance or restore it) it seems to us that the threshold of preventing the achievement of the policy is not rigorous enough. We would suggest instead that any applications for changes of use or additional facilities for existing development should only be acceptable if they do not prevent the objectives of the policy being achieved. But in the case of proposed new development, the test should be that only those proposals which actually deliver the objective of conserving/enhancing/restoring (as appropriate) the areas should be acceptable. We are particularly concerned that the Torbay Local Plan boundaries for new development should be carefully restricted to reflect the needs of an adopted Neighbourhood Plan so that new housing development, and development for support of new housing, should not be allowed to creep into the areas protected by Policy PNP19.	Support and reason noted.  As above for Submission A152.
A061	M	–	–	Support noted.
A090	M	–	–	Support noted.
A089	N	–	–	Support noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A033	N	We need to concentrate on attracting industries (not hotel chains) to provide well paid jobs so that local people (especially younger ones) can afford to buy a property and keep young blood in the area. Green spaces must be preserved else pollution levels will rise affecting people's health and further burdening the NHS.	–	Support and reason noted.
A181	P	Good community involvement - Insightful research on housing need - More decent jobs needed - support of local green space	–	Support and reason noted.
A151	P	<p>1. Pleasing to see that it has been community driven and does not hold back on challenging some aspects of the Local Authority's Local Plan e.g. actual housing need.</p> <p>2. The Neighbourhood Plan addresses the importance preserving ever decreasing green spaces within the Unitary Authority both LGS and Rural Character Areas both.</p> <p>3. Preservation of such spaces in para 2. above are important for: a) the bio-diversity of the area that includes endangered species; b) the health and well-being of local communities; c) tourism.</p> <p>4. The emphasis placed on securing net high quality employment opportunities with house building proportionate to this demand.</p>	<p>PNP4 - Seafront: Apollo / Flagship building is not in keeping with the area. It spoils the sea views and should be re-located within the Town e.g. Crossways. This would also increase the footfall within the Town.</p> <p>PNP20 and PNP 23 - Great Parks / Yalberton Valley:</p> <p>a) the cycle way needs to be extended into Yalberton Valley and on down Stoke Gabriel with 'pinch point' at either end of Long Road to encourage cycling and discourage inappropriately sized vehicles and speeding motorists from using the network of lanes.</p> <p>b) The following phrase is used for Great Parks and should also be included for Yalberton Valley: 'Further proposals that enable local initiatives to boost market gardening, agro forestry, orchards, allotment spaces, horticulture and separated cycling facilities in the area will be supported'.</p>	<p>Support and reason noted.</p> <p>On 'issues raised':</p> <p><u>PNP4</u> Relocation of the Vue (formerly Apollo) complex is a long term objective as indicated in the policy. Meanwhile PNP2 enables relocation elsewhere in the town centre to be supported as suggested – no change necessary.</p> <p><u>PNP23</u> <b>Agreed</b>, to provide a reference for S106 opportunities as they arise and next update of the Devon and Torbay Joint Local Transport Plan, add item h) to PNP23 to read:</p> <p><b><i>"h) securing the provision of separated cycling facilities</i></b></p>

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
		5. Future development reflecting 'good design principles' and retaining local identity - new builds at White Rock, for example, do not reflect this.		<p><b><u>through and into the area with appropriate safety 'pinch points' at either end of Long Road to encourage cycling and discourage vehicles of more than 3.5 tonnes total weight..</u></b> .”.</p> <p>PNP23 - See Appendix 11(d) Submission B013 below and the expanded definition. In combination with existing PNP23 f), this will embrace the range of initiatives supported by Policy PNP23f) without needing to alter the Policy wording.</p>
A161	P	I agree that too many new houses are proposed in the Local Plan and that house building should be built when there is local need dependent on net new jobs being created - the new link road should be attracting large national companies! The draft N Plan seems to be doing everything possible to preserve the few green spaces we have left in the area. Builders are riding rough shod on beautiful areas and pay lip service to protected species and bio diversity. More needs to be done to challenge the Local Authority.	Yalberton Valley is enjoyed by cyclists, walkers & horse riders; therefore the draft N Plan needs to include more ideas to restrict speeding vehicles and prevent inappropriately sized vehicles from accessing the lane networks e.g. pinch points would prevent large lorries and caravans getting stuck on the bends!	<p>Support and reason noted.</p> <p>See A151 above that applies equally to this submission received.</p>
A018	P	At least locals are being listened to.	Para 6.117 to 6.120 I was disappointed that there is no mention of a time scope for the completion of the Kings Ash Brixham Road development (road widening).	<p>Support and reason noted.</p> <p>The issue raised will be for the Devon and Torbay Joint Transport</p>

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
				Plan to consider and fund with contributions from nearby developers where appropriate.
A180	P	–	–	Support noted.
A034	P	–	–	Support noted.
A035	P	–	–	Support noted.
A010	P	–	–	Support noted.
A107-8	P	Preservation of green spaces. Houses built linked to jobs growth.	–	Support and reason noted.
A079	P	Regeneration of the community.	Green spaces - There is limited account taken of the opportunities for walking without using the car first. Needs much more about wellbeing supported by walking - not just at the coast. Green space alone are not productive in terms of well being and we need to support the growth of a mentally well community.	Support and reason noted.  The Local Green Space designations proposed and their proximity to the walking community served will assist in the well being improvement sought.
A045	P	–	–	Support noted.
A046	P	–	–	Support noted.
A106	R	As a community led plan it deserves to be given as much weight as possible in future development.	–	Support and reason noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A048	R	It is so important that Paignton keep the Green Open Spaces for the future generation, and the senior citizens to enjoy now today. Parkfield was given for the people of Paignton, and the youth Hub was really great - certainly not another school to be built in the grounds.	–	Support and reason noted.
A049	R	Keep our green open spaces.	–	Support and reason noted.
A140	R	Please note that the area of green open land west of the ringroad between Whiterock Primary & Hunters Tor Drive has been designated by the Coast & Countryside Trust in 2011 (fig 6.1) as a rural wildlife corridor. I ask that when a private developer finally submits plans to develop this land (Inglewood) great consideration is given to keeping this area as a wholly undeveloped green open space.	–	Support and comment noted.  See also Appendix 11(e) Submission B010 below.
A071	R	To keep the green areas that the area is known for. Priority use of brownfield sites before using greenfield areas.	–	Support and reason noted.
A087	R	–	–	Support noted.
A037	R	–	–	Support noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A078	R	Area needs employment. I agree if this is to do with the Paignton Neighbourhood Plan.	I said no to the 'Inglewood' Plan.	Support, reason and comment noted.
A025	R	The sewage system requires to be updated, there is a problem at this point in time. No parking at the school and it would have to be built to be capable of so many more children ?	–	Support and reason noted.
A109	R	Jobs to houses. Protection of green spaces.	–	Support and reason noted.
A060	R	–	–	Support noted.
A124	R	–	–	Support noted.
A115	R	The draft plan is detailed and realistically positive in its approach.	<p>The Winner Street section: have the team considered creating a Paignton Heritage Museum? The history of the town could be a visitor attraction and the location would be best suited to the 'Old Town'. This could be a natural repository for the Tony Moss materials.</p> <p>The Station square section: the building adjacent to the railway station is in a very poor state of repair (and a poor first impression for visitors). Could the owner of the property be persuaded to maintain the facade? This also applies to Victoria Street and Torbay Road e.g. gutters are dangerous and unsightly, particularly to visitors.</p> <p>The old NTL site: if there are to be new industrial units built could the council provide a financial 'start up' incentive to new businesses? Ref. affordable, mixed</p>	<p>Support and reason noted.</p> <p>A Heritage Museum is a matter more appropriate for the Heritage Society to take forward as the collection holder.</p> <p>The issues raised on maintenance are currently being taken forward by discussions more appropriately outside the Plan preparation.</p> <p>All of the measures identified have been considered.</p>

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
			<p>accommodation: in my opinion, the more accommodation provided in the town centre, the better. This could be a mix of retirement and social housing. The plan already highlights a number of potential sites but have the team considered the conversion of the church which is adjacent to the bus station?</p> <p>Local produce: maybe the local cider could be marketed more professionally in the bay? This is a local heritage product and could be more specifically linked to the bay.</p> <p>The Goodrington section: I couldn't find it mentioned but the existing Cliff Walk could be much more attractive at little cost e.g. additional maintenance plus LED coloured lighting.</p> <p>General: some seaside towns have sea gull proof litter bins. They would be beneficial near the sea front and parks plus more of them required.</p>	<p>As above.</p> <p>Proposals of this nature lie outside the scope of the Plan.</p> <p>Taken into account in Policy PNP1 Annex 2 Design Guide for new developments, other provision is not within the scope of the Plan.</p>
A059	S	–	–	Support noted.
A013	S	The right balance.	–	Support and reason noted.
A014	S	Agree the sewage system is a problem.	–	Support and reason noted.
A110	S	Keeping green spaces and linking houses to jobs.	–	Support and reason noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

<b>ID</b>	<b>Name</b>	<b>Question 1 - Reason given</b>	<b>Question 2 - Issue raised</b>	<b>Response summary</b>
A030	S	The Draft Neighbourhood Plan is more in keeping with the locality of this particular area and gives thought to the countryside in our area i.e. Collaton St. Mary.	–	Support and reason noted.
A123	S	I wish to be guided by the Forum committee members	–	Support and reason noted.
A069	S	–	–	Support noted.
A068	S	–	–	Support noted.
A135	S	–	Remove housing sites on North side of Totnes Road	Support noted. It is not clear which area north of Totnes Road is being referred to.  See response to Appendix 11(e) Submission B009 where a boundary change has occurred.
A086	S	–	–	Support noted.
A026	S	–	–	Support noted.
A027	S	–	–	Support noted.
A028	S	–	–	Support noted.
A029	S	–	–	Support noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A062	S	–	–	Support noted.
A134	S	I can see a great deal of work and consultation has gone into this plan and I am happy to approve it.	–	Support and reason noted.
A147	T	In overall principal I agree with the plan being put forward. The bay's infrastructure needs to be sorted and improved first, gradually increasing house on suitable land as and when needed without impacting our seaside and countryside views that we are known for. The only issues I feel is the retail side has to be prioritised to bring people to the towns as well as visual greenways. As it stands at this point in time the council will not budget for greenery upkeep or improving the shop frontage until they are getting the income from parking and tax. The cinema should be placed out of town like Plymouth's with eateries and bowling facilities for rainy days and the building on the sea front could become a tropical aquarium linked to the zoo to maintain all weather attraction in town. All of these things I'm sure will be dealt with as they arise so that's why I agree to this plan.	–	Support and reason noted.
A052	T	–	–	Support noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A073	T	I broadly support the plan.	<p><u>PNP25</u> - It is unclear what the all-weather attractions are, I do not wish to see further buildings or hard surfaces in the valley.</p> <p><u>PNP24</u> - FGA SS2.2 areas B &amp; C, I would like to see these areas protected from any building development.</p> <p><u>PNP8</u> - I see no purpose in replacing unwanted and underused retail premises, there are far too many empty shops in the town already. Use the site almost entirely for residential purposes.</p>	<p>Support noted.</p> <p>On 'issues raised':</p> <p>PNP25 – if any further hard surfaces or buildings were to be involved, they would have to consider how they fit with the other policy elements.</p> <p>PNP24 (and Fig 7.15) – comment noted.</p> <p>PNP8 – the preference raised is provided for in PNP8 b).</p>
A041	W	Good to improve the Bay and keep it green.	–	Support and reason noted.
A020	W	–	–	Support noted.
A001	W	Supports what the community wants to see. Very well balanced.	–	Support and reason noted.
A117	W	Well thought out plan by the people that live here and not forced upon us by the authorities	–	Support and reason noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A104	W	It is a very comprehensive plan and offers a strategy applicable in this modern age. I like the fact that it recognises keeping a sustainable retail town centre for Paignton, and boosting the tourism economy which helps the whole neighbourhood. As well as preserving green spaces and amenity. 6.98 I endorse the re-location of a Tourist Information office to a more suitable site near the transport hub and provision of more toilets in Paignton town centre.	6.74 & 6.76 & 6.89 Be more bold about re-focusing the retail town centre in Paignton. Remove excess capacity at Crossways, as it is dead and no longer within shopper's footfall. Turn it into a supermarket site or encourage redevelopment for housing residential use. Give priority regeneration to Victoria Square as it has a large car park behind and is on the main pedestrian corridor route to the seafront, down Torbay Road. 6.87 Simplify the one-way road system/transport hub in Paignton. It is very confusing to motorists (day trippers/holiday makers). Somehow improve signage. 6.69 Be bold and support as a first priority the pedestrianisation of Torbay Road. It really doesn't need car access. This links to 6.96 Victoria Street. 6.114 Environment - there is a photo of the Former Nortel Site White Rock. Please include a provision to remove this eyesore and landscape the site. It is on a main gateway corridor to the area for visitors and residents alike. 6.66 & 6.91 & 6.149 General - I suggest a mention of the Torbay Air Show needs to be included in the Plan and its possibilities for showcasing Paignton/Preston seafronts and promoting the Neighbourhood for tourism income.	Support and reason noted.  All of the 'issues' raised relate to lower case background information that is helpful but unnecessary to add to the Plan as presented.
A072	W	All matters affecting the people of Paignton seem to have been comprehensively covered.	–	Support and reason noted.
A058	W	–	–	Support noted.
A002	W	I would like to conserve all the greens and town development	–	Support and reason noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A114	W	Seems to have covered every eventuality and will stop developers developing for its own sake. Paignton needs more permanent well paid jobs - I see that is what Theresa May said the UK needed in her interview this morning.	–	Support and reason noted.
A103	W	The Plan will provide a blueprint which the Council will have to refer to.	It would make it much easier to navigate the Plan if a page number in square brackets was included after the reference to a supporting document and before referring to a 'fig' number. The same would apply to all references directing the viewer to supporting documents within the text of the Plan.	Support and reason noted.  <b>Agreed</b> , the suggestion made will be carried through into the layout of the final version submitted.
A042	W	I would be happy if a heart could be given back to Paignton. I see this by the 'Crossways' shopping centre either re-developed or ideally knocked down as a green area or a place where stalls can be used to sell local goods or 'farmers market'.	–	Support and reason noted.
A039	Y	It appears to be a well constructed proposal. I would however suggest that somehow a way should be found to curtail traffic using Winner Street as a "rat run" especially if you want to encourage new shops.	–	Support and reason noted.  See amendment re Well Street above at Submission A083.
A064	Y	–	–	Support noted.
A063	Y	–	–	Support noted.
<b>(Unnamed persons)</b>				
A040	G	–	–	

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

<b>ID</b>	<b>Name</b>	<b>Question 1 - Reason given</b>	<b>Question 2 - Issue raised</b>	<b>Response summary</b>
A170	Z	Sounds logical to improve the area as a tourist spot, improve transport and maintain a great place to live.	–	Support and reason noted.
A113	–	It is holistic and sustainable.	–	Support and reason noted.
A118	–	It's pretty comprehensive. Clearly I've not read every word as the various reports are long ... and comprehensive. Q2 below asks if there are any changes I'd like to see - the answer's no, but I'd just like to say I'd hate for Paignton & Brixham to keep expanding until one runs into the other. This has already happened at the Paignton-Torquay end & is in danger of happening at the south end of Torbay. It may well be covered, but I've done 180 pages already. Forgive me if it is.	–	Support and reason noted.
A119	–	I am in favour of the local food and green drainage policies. I also like the fact that many green spaces will be protected.	–	Support and reason noted.
A131	–	–	–	Support noted.

**Appendix 11(a)– Individuals (in alphabetical order) – Supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A145	–	Plans generally to "smarten-up" the locale WITHOUT COMPROMISE TO THE NATURAL ENVIRONMENT are welcome. A simple binary question (Yes/No response) to a 100+ page document is however a rather crude measure of support.	<p>In general, the document sets out a lot of information on 'strategy' (Aims) but very little on 'tactics'. Measures to regulate quantity and quality (vehicle size) of traffic flow along Long Road, especially after developments near SDC are missing.</p> <p>6.125 The upper part of the Valley containing the hamlets of Higher and Lower Yalberton lie within Torbay Unitary Authority and where countryside and conservation designations require change. What exactly does "... designations require change." mean in this context? ? greater risk of building and encroachment into the natural environment.</p>	<p>Support and reason noted.</p> <p>The policy wording has to strike a balance between identification of the overall Aims in a way that clearly show the outcome sought whilst at the same time not being too prescriptive in more detailed parts, in order to meet the requirements of the legislation and guidance that governs how the Plan is expected to be prepared.</p>
A150	–	It seems to be a bit long but I think it is a positive step forward.	–	Support and reason noted.
A175	–	It seems well thought through and considerate towards many of the situations faced by the area.	–	Support and reason noted.
<b>Total</b>	<b>150</b>	<b>Respondents</b>		

**Appendix 11(b) - Individuals (in alphabetical order) – Not supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A081	P	That houses are not needed in such large quantities as locals cannot afford them. Some of the green land suggested will cause flooding in Collaton. I am completely in favour of brownfield sites.	Green fields behind the mobile homes at Collaton St.Mary should be removed from the plan altogether. We do not have the infrastructure for it. We already get grid-locked in the summer.	The sites referred to are those identified in the Torbay Local Plan (and Masterplan SPD). Both make it clear that any development will only be approvable if they can overcome the infrastructure and protected habitat issues raised.
A167	F	I cannot support the plan in its present form for the following reasons: Blagdon Valley has not been identified as an Area of Outstanding Natural Beauty and Bio Diversity, and surrounded by a buffer zone to protect it from the ecological sterility that comes from people , their pets and light pollution. The possible development along the Totnes Road, Kings Ash Road and Great Park Lane come too close to the valley and make no allowance for the effect of development beyond its actuality. Insufficient effort has been made to identify any future road expansion requirements and ensuring their possibility (as mentioned page 61, Policy PNP 24 – Collaton St. Mary item i.). The development of the car boot site behind Collaton St. Mary Primary School is the wrong side of a major road which is already congested in the summer. Further developments of Great Parks and Kings Ash will ultimately necessitate the	Page 87 Figure 7.5 FGA SS2 12 Area E should be identified as a part of the Blagdon Valley and as such a conservation area to be protected. Its development would hamper any future widening of one of the major routes into Paignton and result in the last view of the countryside before entering Paignton being lost. Page 53 1J The Blagdons should be designated an Area of Outstanding Natural Beauty and Biodiversity and protected in the strongest way possible.	<p>On Reasons given for not supporting the Plan -</p> <p>a) AONB designation is not in the gift of a Neighbourhood Plan to change, though the view expressed is supported.</p> <p>b) More detailed road proposals will only be possible to determine if and when planning applications are submitted.</p> <p>c) 'Sterile' green spaces do not exist in Paignton in either inner or outer areas. They each give value as recognised in the Local Green Space and Rural Character Area assessments made.</p> <p>d) Sites able to achieve 4 storeys are shown in the town centre area, but are not accepted as</p>

**Appendix 11(b) - Individuals (in alphabetical order) – Not supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
		<p>expansion of the Totnes Road and Kings Ash Road and By-pass will then be required, right through the Blagdon Valley. Too much importance has been given to the 'sterile' green spaces in Paignton at the expense of the surrounding green belt with its rich Biodiversity. Low rise development (four storey) is a great way of providing increased accommodation, sustainable public transport systems and sustainable local shops and restaurants. No areas of Paignton have been identified as suitable for this kind of redevelopment. It is important that Paignton not be allowed to rot from the centre and that green field sites handed over to developers because they are more profitable. (We are supposed to be 'protecting the planet' not preserving it in concrete. There is no going back.) I also feel that a précis of the Policy Document would have been useful for the layman as 506 pages of planning speak is hard to get through. Notwithstanding these comments, I think this is a very good document to take forward and it's authors are to be commended.</p>		<p>appropriate to the setting of the rural area.</p> <p>e) A summary of the main proposals was circulated to every property in Paignton in 2015 and an executive summary was included alongside the 2017 pre-submission document set.</p> <p>f) Comment on support for the hard work of the community Forum is welcomed.</p> <p>On the "issue raised":</p> <p>Agreed that area 'E' has constraints that it will necessary for a developer to show can be resolved. (see also response to A081 above).</p>

**Appendix 11(b) - Individuals (in alphabetical order) – Not supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A144	G	<p>After studying the draft Neighbourhood plan I feel there are some issues relating to Collaton St. Mary that need resolving before I can support it. In the green insert 'Policy PNP24 -Collaton St. Mary Village' on page 61 it states that ' any further development beyond the present area shown on the inset plan (Fig1.2) will be supported only where proposals a,b,c,d,e,f,g,h,i,j are achieved. But, Fig 1.2 on page 8 shows a large ring around Collaton St. Mary. Therefore, as the plan is at the moment, the conditions a,b,c,d,e,f,g,h,i,j that should have been applied to Collaton St. Mary will only have an effect outside Collaton St. Mary. It should read 'inside the area' not 'beyond the area' if Policy PNP24 is to correlate correctly with Fig 1.2. It cannot correlate with Fig 7.15 instead of Fig1.2 either - as then the conditions a,b,c,d,e,f,g,h,i,j will then not apply to the council's presently proposed masterplan. Not happy at all with it as it is. It needs serious attention.</p>	<p>In the green insert 'Policy PNP24 -Collaton St. Mary Village' on page 61, I feel that there is another important condition ('k') that should be included. If there is to be development on the scale shown on the Masterplan at Collaton St. Mary, it cannot be done without a flood defence scheme on Yalberton river at Collaton St. Mary. This defence has to be man made and would need constant maintenance for the rest of time in order to safeguard property, businesses and lives of those who live downstream from it. Climate change is now considered to be real with ongoing warmer and wetter weather. For our peace of mind the Neighbourhood Plan should include a condition 'k' for Collaton St. Mary that states similar to: 'Before any development takes place at Collaton St. Mary, people living downstream from its flood defence scheme must be assured of their safety and it must be agreed who is to have responsibility for the safety of property, businesses, life and livestock in the event of a problem with the defence scheme.</p>	<p><b>Agreed</b>, confusion could arise between (Fig. 1.2) and text of Policy PNP24 – amend text of PNP24 to read</p> <p><i>“...“Any further development beyond the present area <del>shown on the inset plan (Fig. 1.2)</del> will be supported only where the proposals: .....”.</i></p> <p>On “issues raised”: PNP24 d) and g) already pick up requiring proof of flood prevention before development is approved. See also PNP1 k) Annex 3.</p>
A172	M	<p>Far too many greenspaces being proposed for development throughout the area</p>	<p>Specifically I think the proposal FGA SS2.2 Area E goes far too far up Blagdon Road which is classified in your own Rural Character Management Strategy as Highly Sensitive and planning has already been refused in this area. Keep any development close to Totnes Road</p>	<p>The sites referred to are those identified in the Torbay Local Plan (and Masterplan SPD). Both make it clear that any development will only be approvable if they can overcome the infrastructure and</p>

**Appendix 11(b) - Individuals (in alphabetical order) – Not supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
				protected habitat issues raised.
A129	P	<p>The plan needs more adjustments</p> <ol style="list-style-type: none"> <li>1). housing up the Westerland Valley only to go in the first fields from main road not above skyline small plots for local builds.</li> <li>2). countryside needs more protection and wildlife.</li> <li>3). less green land inside the town boundary.</li> <li>4) land for healthcare.</li> <li>5) transport trams linking all 3 towns.</li> <li>6) new road to go to Stoke Gabriel to Long Road.</li> </ol>	As Q1	<p>On Reasons given for not supporting the Plan:</p> <ol style="list-style-type: none"> <li>1) The sites referred to are those identified in the Torbay Local Plan (and Masterplan SPD). Both make it clear that any development will only be approvable if they can overcome the infrastructure and protected habitat issues raised. It would not be appropriate for the Neighbourhood Plan to change this.</li> <li>2) This is provided by PNP1 Annex 1 and PNP19.</li> <li>3) Not agreed - green land inside the town is also important.</li> <li>4) Healthcare facilities are already covered in the Council's Section 106 and CIL policy requirements for new development (see Basic Conditions Statement page 59 re Document 4).</li> <li>5) Trams have merit but go well beyond the scope of this first</li> </ol>

**Appendix 11(b) - Individuals (in alphabetical order) – Not supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
				Neighbourhood Plan.  6) As 5 above.
A091	P	See below	See below	As below.
A157	P	<p>I do not support the plan for many reasons. Prime amongst these are:</p> <p>1. Lack of ambition. As the plan itself describes, 5000 jobs is the target for growth. This number should be much higher, 5000 shows a short sightedness on what is needed for Paignton. The lack of ambition is also shown in the prioritisation for tourism in the plan, which therefore prioritises low wage, unskilled and insecure employment. This is not what we want to build the future of Paignton on. The plan also notes a decline in jobs but makes no attempt to plan to reverse this, in fact it notes itself that the assumptions on job growth have already been shown to be false, therefore on this point alone the plan must be re-drafted.</p> <p>2. The target for 5000 jobs and circa 9000 new homes shows that it is planning for almost 4000 homes to have no employment in the Paignton area, necessitating travel out of area,</p>	<p>The points upon which I do not support the plan above all need to be addressed in their relevant sections. Without these changes the plan is not a valid document submission for this form of action. Also, who cares about the colour of the cover? It is the content I am interested in.</p>	<p>On Reasons given for not supporting the Plan:</p> <p>1) Net growth of 5,000 to 5,500 jobs is set by the adopted Torbay Local Plan and is not materializing. A higher number would fail to be realistic under NPPF para.154. This will be for the required Local Plan Review in 2020 to address.</p> <p>2) Agreed there is growing evidence of an unsustainable imbalance that the Local Plan says will be addressed at the Review required in 2020.</p>

**Appendix 11(b) - Individuals (in alphabetical order) – Not supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
		<p>contravening the NPPF, plus makes no provision for improving transport links in and out of the area. Some measures are mentioned but no concrete thoughts communicated.</p> <p>3. The plan itself already states there is an over supply of housing in Paignton, therefore the housing growth numbers do not make logical sense.</p> <p>4. I do not agree with the stated aims of the plan. As a Paignton resident, and never having been consulted, the prioritisation on tourism is madness. Important yes but the wellbeing and sustainable regeneration of Paignton through job led growth should be the priority, not making the place look pretty for tourists.</p> <p>5. The plan needs to detail how the garden town concept is to be delivered and presented, including addressing why the current developments in Yannons Farm, Devonshire Park and White Rock (circa 800 houses) do not comply to this concept, thus it makes this concept somewhat moot.</p> <p>6. Existing developments in the planning</p>		<p>3) See 2 above.</p> <p>4) Extensive consultation has taken place as evidenced in the supporting Community Involvement and Consultation document that accompanies the proposed Plan. This shows how the community has identified and supported the stated aims throughout.</p> <p>5) The Plan and supporting evidence expressly focuses on the need and justification to give greater attention to existing open space, landscape and biodiversity assets which then enable Paignton's 'garden town' heritage to be retained and expanded.</p> <p>6) Not accepted that failures in the</p>

**Appendix 11(b) - Individuals (in alphabetical order) – Not supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
		<p>process do not comply with the detail on p27 &amp; p28 which brings the importance of this plan to developers into question.</p> <p>7. The overarching detail of homes v jobs is contradicted in para 6.10 which shows that ~9000 homes and 5000 jobs goes against the NPPF. The objectives noted on p16/17 contradict the overall aims of the plan (~9000 homes/5000 jobs) therefore either the ambition for jobs needs to be increased or the plan for new homes be reduced.</p> <p>8. Harbour - the plan focuses on the need of tourists whereas it should prioritise the needs of local residents. Keep the harbour as a working harbour not let it be dragged into the marina style approach which prices out locals.</p> <p>9. Station square - in general correct but does not address issues around vagrants and outflow from pubs like Winstons which is a definite turn off for visitors and residents alike. Nothing to address the clean up of the square.</p> <p>10. Town centre/Torbay Road - the plan should proactively discourage arcades as these keep the areas where they are</p>		<p>past make it invalid to require better in the future.</p> <p>7) Agreed this will be the key issue in the Review of the Local Plan required to take place in 2020.</p> <p>8) <b>Agreed</b> appropriate to expand PNP3 b) to read “....<i>continue the mix of traditional uses <u>as a working harbour</u>, including commercial and residential accommodation.....</i>”.</p> <p>9) The specific concerns raised go outside the permitted scope of a land use plan.</p> <p>10) PNP1 Annex 2 a) to d) and PNP18 are considered sufficient and proportionate to ensure these</p>

**Appendix 11(b) - Individuals (in alphabetical order) – Not supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
		<p>present in the 1950's and do not advance the quality of tourists coming to Paignton (does not increase general spend per visitor). The plan should also discourage shops having individual display signs/fascias/frontages. To be a more attractive tourist destination, uniformity of look makes for a better environment of Bath, Oxford etc. This also applies to Victoria Street shopfronts.</p> <p>11. Transport/getting around - The plan does not address the single biggest issue to getting around in Paignton, traffic lights. These should be removed. Evidence shows that these cause more air pollution than other form of traffic control and was on the last Mayor's agenda to tackle. Removal of traffic lights, particularly on Brixham Road must be addressed. Also the road planning detail for the Collaton area does not take into account extra homes, or traffic volumes therefore needs completely revising.</p> <p>12. I disagree with 7.31 and 7.32 as these are contradictory to the objectives of more housing and jobs, if the area is forcibly kept the same it will just become a great big car park.</p>		<p>issues are addressed in applications when received. These are additional to the Local Plan and Council's retained Environmental Guide referred to in the Basic Conditions Statement at Document 1 (page 56).</p> <p>11) These are matters for the Joint Local Transport Plan for Torbay and Devon to address.</p> <p>12) Comment noted and will be for the Review of the Local Plan to address.</p>

**Appendix 11(b) - Individuals (in alphabetical order) – Not supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
		<p>13. The plan notes its ambition to encourage employers in para 6.116, but the major ones so far are retail on Devonshire Park. These will be low skill, low paid jobs (the Range etc) - this is not a way to build a sustainable future, the evidence document supports this comment. The EPIC centre is something that will try to address the problem directly but it needs more support and infrastructure, not retail outlets around it. The EPIC centre development is not mentioned, included or referenced, a significant omission to the plan.</p> <p>14. On inclusion document it says that the forum has steady at 400 members. With 43000 residents in Paignton how can this claim to be inclusive or representative? What evidence of wide participation is provided, beyond a 6 week period, that I for one was not consulted during?</p> <p>15. In the CI document the links to the SWOT analyses are not working therefore the referenced detail is unavailable to the reader. These documents should not be considered complete or valid to include until the SWOT analyses are made available to the public.</p>		<p>13) PNP21 already gives clear support to the type of developments referred to.</p> <p>14) See the Community Involvement and Consultation document which accompanies the Plan and describes the extensive consultation that has taken place since day 1.</p> <p>15) Constant checks were, and are, made to ensure the links are working and have been found not to have any problem. The link to view is the wording in blue. It may be the reason for the failed attempt was due to attempting to access these via the text in black.</p>

**Appendix 11(b) - Individuals (in alphabetical order) – Not supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A169	R	Concerns regarding too many houses being built-where are the potential buyers coming from? The growing issue of lack of employment issues-jobs promise has not materialized. Danger of the traffic in lanes to cyclists /dog walkers -speed concerns-the whole of Lower Yalberton has been over developed and this area is now being seriously compromised as a place to live. Nature concerns ref tree preservation/natural wildlife/bats totally ignored for the sake of further planning.	See above (left)	Agreed the concern emerging of unsustainable imbalance between housing and job growth will need to be the main issue in the Review of the Local Plan required in 2020.
A143	T	Having read through the plan I feel not enough importance is given to protecting our green spaces. These are rapidly disappearing under more and more housing developments.	-	Reason given for not supporting the Plan is noted.  Many other submissions received have supported the view that importance has been given to the growing need to protect and improve our green spaces.

**Appendix 11(b) - Individuals (in alphabetical order) – Not supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A142	T	I do not support the plan as it is based on a false premise. Torbay's main purpose is a holiday resort and everything must be done to attract tourists. That means easy access to clean beaches and open green spaces. Over development in the form of industry and housing will not help in attracting tourists. The population of Paignton is decreasing therefore more housing is not required. I have no faith in the Planners in making the right decisions. The South Devon Link road cost us heavily and was supposed to provide a boost to the economy. It hasn't done so, in my own experience it now becomes much easier to drive out of Torbay to shop in Newton Abbot or Exeter than to join the snarl up into Paignton. To sum up I don't agree with the plan as it supposes the only way forward is to create "growth" which hinders the maintenance of a restful holiday destination. I also have no confidence that the Planners will make the right decisions, going on past experience.	All of it.	Reason given for not supporting the Plan noted.  Considerable effort has been made to present accurate information throughout the Plan and supporting documents to provide the confidence in decision making sought.
<b>(Unnamed persons)</b>				
A127	–	No	–	Noted that no reason for not supporting the Plan has been given.

**Appendix 11(b) - Individuals (in alphabetical order) – Not supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A128	–	Not enough affordable housing, in particular regulated rent secure tenancy social housing.	More affordable housing, in particular regulated rent secure tenancy social housing.	This is an agreed need already covered in PNP1.
A141	–	-	No housing!	Comment noted.
A158	–	The Paignton Cinema is not suitable as the ART CENTRE	<p>Torbay Council’s publication “On the crest of a wave” A Strategy for the Arts and Creative Industries in Torbay 2006-2016 page 19, states “Develop a multi-purpose centre with particular emphasis on the visual arts for permanent and temporary exhibitions “ (This ambition was also in the Council’s earlier strategies ). To address this and other cultural questions, the Council together with the Arts Council called a meeting at the Riviera International Centre on the 17th Oct. 2012 “What could Torbay’s cultural future look like? “ The wish of the majority of attendees was to facilitate the Council’s stated aim of an Arts Centre. To that aim a group was formed “Torbay Action for Art -TAA “and formally constituted. This group identified Parkfield House as being a highly suitable Council owned property that would meet the Council’s stated objectives. The TAA committee had discussions with Steve Parrock, Adrian Sheen, Marissa Wakefield, Cllr Dave Butt, Cllr Darren Cowell, and have had valuable assistance from Brian Roberts of Number One Consulting . Cllr Dave Butt Executive Lead for Culture and the Arts referred to the possibility of an arts centre in his article in the Herald dated 24th April 2013. As the project develops we would look for ongoing advice and support from the above as well as those we have had informal contact with:- Carolyn Custerson English</p>	<p>The Plan is geographically based, not topic based. This meets community wishes throughout the preparation stages. No priority is given to any one site over another that might prove suitable for an Art Centre, though location in the town centre is potentially capable of assisting achievement of Policy PNP2.</p> <p><b><u>Agreed</u></b>, add to text of PNP2 (Town Centre) to read  <i>“ a) improve the vibrancy, <b><u>cultural experience</u></b>, appearance and layout of the area;.....”.</i></p> <p>See similar submissions below Appendix 11(e) Submissions B105, B106, B107.</p>

**Appendix 11(b) - Individuals (in alphabetical order) – Not supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
			<p>Riviera Tourism Company, Tracey Cabache                      Community Development Trust: Anna Gilroy Torbay                      Council Arts Officer, Mischa Eligoloff Cultural                      Partnerships Officer, et al. TAA's committee sees the                      Council's stated aim as admirable and of benefit to all                      ages and groups in Torbay and tourists alike and have                      submitted our suggestions to be included in the three                      towns Neighbourhood Plans. The added benefit of                      providing this cultural facility is that Torbay could earn                      the reputation of "Coast, Countryside and Culture",                      thus raising the nature and number of its visitors. It is                      recognised that thriving economies in the towns and                      cities of the UK invariably also have a thriving art                      scene. Bodies such as the Arts Council and the United                      Kingdom Arts and Design Institutions Association                      (Ukadia) have acknowledged this in several                      publications by highlighting the £60bn the creative                      industries contribute to the economy and demonstrate                      why sustaining that contribution with continued                      investment will become increasingly important to                      economic recovery. The TDA have addressed aspects                      of the situation with their Innovation Centres, they are                      also giving guidance on writing a business plan                      (currently at draft stage) for the use of Parkfield House                      as Torbay's Art Centre. Are you on the electoral roll for                      the Paignton area so that you are able to vote on the                      Plan when it goes to Referendum?</p>	
A168	-	<p>The chance for most residents to see the                      plan is VERY limited. It should be on                      show at more places eg. Sainsburys,</p>	<p>The whole concept.</p>	<p>Part 3 of this Community                      Involvement and Consultation                      document describes the extensive</p>

**Appendix 11(b) - Individuals (in alphabetical order) – Not supporting the Plan for the reason where given**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
		Morrison's Churston library, Cinema. etc. Also it is too extensive and complicated for most residents to bother with. Plain English please.		consultation undertaken at each stage. This included posters in Sainsburys and Morrison's, a plain English summary and a leaflet giving full details on where further information could be viewed.
<b>Total</b>	<b>14</b>	<b>Respondents</b>		

**Appendix 11(c) - Individuals (in alphabetical order) - No preference stated**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
A043	M	<p>I recently received your leaflet and would like to make some comments on the Paignton Neighbourhood Plan. Firstly, I would like to congratulate you on a fine and comprehensive document. I live on St Marys Park in Collaton and because of my interest in this area would like to focus my comments on the plans for Collaton. I feel that if development is going to happen in Collaton then we have the opportunity to create something great, something which benefits everyone, rather than being another high density estate tacked on to Paignton which is aimed at providing as many houses as possible.</p> <p>A few months ago I contacted the Council with some development plans I had for the village as an alternative to the Masterplan. I have attached these plans as a PDF file (available to view (30 pages) on Forum website at <a href="http://www.paigntonneighbourhoodplan.org.uk/PDF/Documents/2017-05-13%20Comments%20on%20PNP%20(KM)%20Attachment.pdf">http://www.paigntonneighbourhoodplan.org.uk/PDF/Documents/2017-05-13%20Comments%20on%20PNP%20(KM)%20Attachment.pdf</a> ).</p> <p>As a quick summary, my idea is to create a large central park, as a focus point for the village, with low density, self build, energy plus houses together with many facilities for locals and visitors alike. The feedback from the council was that there was a lot of merit in many of the ideas but that the Masterplan had been agreed and that a lot of time and effort had already gone into that. If that is the case then I wonder what influence the Paignton Neighbourhood plan can have. Anyway, assuming that it still can influence the plans for Collaton I wanted to pass on my thoughts.</p> <p>Please have a look at the plans and then I have the following comments which I would add/incorporate into your section in the Neighbourhood Plan relating to Collaton.</p> <ul style="list-style-type: none"> <li>• Lower housing density, more space between houses and larger grounds. The Masterplan proposes a housing density of 20-25 properties per hectare. I believe this would simply create a housing estate instead of a village. I would propose a density of 5 or 6 per hectare with lots of public open spaces that the whole village can use and be proud of.</li> <li>• Self build properties would help create a village feel and a community that grows with a shared vision and ethos. People would want to be a part of a modern developing open village rather than just another high density housing estate tacked on to Paignton. To make existing Collaton residents feel more part of the development the self build plots could be</li> </ul>		<p>A concept of self-build on appropriate land at Collaton St. Mary is capable of being supported by Policy PNP1, and PNP24, provided that any proposal is also able to overcome the significant infrastructure and protected habitat issues involved. This requirement applies equally to Collaton St Mary Masterplan SPD which does not form part of the statutory development plan. It is agreed the concept presented has merit but requires considerably more information than currently shown and requires time to assemble. No change to the present Plan would be appropriate.</p>

**Appendix 11(c) - Individuals (in alphabetical order) - No preference stated**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
		<p>offered to them before being offered to others.</p> <ul style="list-style-type: none"> <li>• Self build housing is more affordable providing the plots are not overpriced.</li> <li>• Insist on energy plus houses with sustainable drainage that have little impact on the environment.</li> <li>• Community based power storage from solar roofs, ground heat exchange etc. for example using Tesla Powerpack storage. Every solar roof would store unused electricity in these community battery units. This would be one way of making Collaton residents feel part of the new development and being able to benefit from it.</li> <li>• Large open area at centre of village to provide a focal point for events, exercise, leisure and nature. Events could include music, outdoor cinema, something like the Marldon Apple Pie Fair, cross country runs etc.</li> <li>• Tourist attractions and employment opportunities. Children's/educational/community centre, pub/restaurant, viewing towers, tobogganing, cycle paths, shops, GP etc.</li> <li>• Only clean heating to prevent the increasing smog in winter months in the village. Last winter there were about 7 days of smog over the village that I noticed due to wood/coal burning. I believe all new houses in the village should be non air polluting.</li> <li>• Car air pollution during the school run on Totnes Road is becoming a big problem due to the stop/start nature of the traffic at that time and the high walls and buildings on either side of the road. A solution would be to have no parking on that section and possibly have a pedestrian bridge rather than a pelican crossing. These changes would keep the traffic flowing. More parking would therefore be required which could be at the BMW garage site, at the fields on Stoke Road and possibly to the north of Totnes Road opposite the Parkers Arms. Rather than traffic lights on the zebra crossing between Stoke Road and Borough Road a pedestrian bridge would keep the traffic flowing better and therefore reduce the air pollution.</li> <li>• The Neighbourhood Plan says - "do not detract from prominent landscape and other local features that give the area its identity and character". Agreed, however, I think more could be done to open up these areas as public spaces. Green fields look nice but are private land and not accessible. I would open them up for walks, cycle paths, exercise stations, viewing towers etc. Even plant woodland or orchards or other natural environments. Again this helps to provide a village feel and encourages tourism to the area.</li> </ul>		

**Appendix 11(c) - Individuals (in alphabetical order) - No preference stated**

ID	Name	Question 1 - Reason given	Question 2 - Issue raised	Response summary
		I feel this is an opportunity to dream big, create a village community and a place where people want to live.		
A125	M	-	-	As A043 above.
<b><i>(Unnamed persons)</i></b>				
A177	-	-	The Paignton and Brixham boundary line needs changing so Paignton has a greater say on the land at White Rock	Noted, though such change is not considered necessary.
<b>Total</b>	<b>2</b>	<b>Respondents</b>		

**Appendix 11(d) – Organisations (in alphabetical order) - Supporting the Plan for the reason where given**

ID	Name	Submission received	Response summary
B005	Beechdown Park Residents Association	We need to preserve our 'green spaces' for future generations. The areas to the west of Paignton are especially important and need protection against future development. Beechdown Park is surrounded by land which the Council has earmarked for building housing estates in the near future.	Support and reason noted.
B002	Campaign to Protect Rural England (Torbay.)	<p>CPRE Torbay supports the Paignton Neighbourhood Plan: We commend the years of hard work carried out by dedicated volunteers, particularly for the clarity of the documents produced for such a massive project. The evidence based documents are exceptional in the way Paignton NP Forum have understood, highlighted problems, aspirations and proposed solutions for the bay. It is evidently clear the genuine frustrations that residents and businesses feel about the impact of soul less overdevelopment, loss of green space, lack of brownfield regeneration and poor infrastructure in the Paignton area. Policy PNP1 Annex 1 defines the Rural area, Local Green Space and Local Food which CPRE fully support. The Forum has a very clear vision of what needs to be achieved for a successful, sustainable, healthy future and deserves to be listened to.</p> <p>We draw to your attention the Government White Paper recently published which fully supports Brownfield first. This is crucial to tourism and employment in Torbay where "<u>Our Environment is Our Industry</u>". We do not support development of green fields where brownfield land is available, this has been highlighted in the Paignton NP.</p> <p>The <u>Supporting Evidence Document</u> sets out clearly what is happening to population and job numbers in the bay particularly pages</p> <p>9 (Job Loss and future growth),            12 (Falling job numbers),            13,14 (Falling population),            17 (Increase in long term vacant homes).</p> <p>Therefore we continue to question the Housing Need and the number of additional dwellings for Paignton and the wider Torbay Local Plan of 8,900 dwellings. Lack of employment data shows that job numbers in Torbay have recently decreased from 59,000 to 57,000 despite the opening of the Kingskerswell link road. Empty homes have also increased by almost double.</p>	<p>Support and reason noted.</p> <p>Agreed.</p> <p>Agreed this will be the main issue for consideration at the Review of the Local Plan required in 2020.</p>

Appendix 11(d) – Organisations (in alphabetical order) - Supporting the Plan for the reason where given

ID	Name	Submission received	Response summary
		<p><u>South West Water Sewage Capacity</u></p> <p>We remain concerned particularly as effluent was released yet again into Brixham Harbour in January 2017. We understand there is a constant remedial work carried out at the plant involving removal of the roof and lorries to take effluent away.</p> <p>We refer to Policy PNP-1 I to K and Annex 3 Page 17 of 104 "Details that accord with Annex 3 of proposed foul and surface water drainage and other key infrastructure being required when development applications are submitted and <u>not being dealt with subsequently by conditions</u>". Torbay Council must be satisfied that the assessment on phasing supporting the conclusions reached on sewer capacity is fully justified. In our opinion this policy should be amended so that K applies to anywhere in the Neighbourhood Plan area.</p> <p><u>White Rock 2</u> Page 53 of 104</p>	<p>Information noted.</p> <p><b><u>Agreed</u></b>, (see response also from Environment Agency Appendix 11(g) Submission C001, and Torbay Green Party Appendix 11(d) Submission B013 below). Amend Policy PNP1- Annex 3 as follows:            After main heading of "Surface Water" add underlined sub-heading to read:  <b><u>"Area wide"</u></b>            Amend first paragraph to read:  <i>"Developments <del>within the Rural Character Area defined in Policy PNP 19</del> will be required to achieve....."</i>            And before item a) add underlined sub-heading to read:  <b><u>"Within the Rural Character Area defined in Policy PNP19"</u></b></p>

Appendix 11(d) – Organisations (in alphabetical order) - Supporting the Plan for the reason where given

ID	Name	Submission received	Response summary
B007	English Riviera UNESCO Global Geopark	<p>Consideration should be given to including parts of <u>undeveloped</u> White Rock within the Rural Character Area. We recently commented on the Brixham NP consultation in which we said "We support in particular the Brixham NP designation of Rejected Housing Sites which include <u>White Rock 2</u>." Merging of settlements will destroy the Rural Character of the area.</p> <p><u>Importance of Habitats</u></p> <p>We support the conclusion of SA and HRA screening and suggest Paignton NP consider expanding PNP1 Annex 2 F to H safeguarding bio-diversity by adding a clarification similar to <u>Brixham Policy E8</u>. This is especially important with respect to habitat South of White Rock which supports nationally rare or endangered species (such as Cirl Bunting and Greater Horseshoe Bat),</p> <p>CPRE Torbay members are resident in the Paignton area and on the electoral role. Many of our members have worked on Neighbourhood Plan throughout Torbay for several years.</p> <p>The plan was discussed by the Geopark Management Group (GMG) at a meeting held on 17 May and the group have a number of comments:</p> <ol style="list-style-type: none"> <li>1. The GMG welcomes that the significance of the geology of Yalberton Valley and Blagdon Valley has been recognised and that the plan includes an action to register Regionally Important Geological Sites (RIGS). The GMG would support a survey taking place and the consideration of designation and is happy to help in any way it can. However the GMG would be grateful if any reference to the Geopark designation in relation to this be amended to the "English Riviera UNESCO Global Geopark". Use of "Torbay Geopark" on pages 58 and 59 is incorrect.</li> </ol>	<p><b><u>Agreed</u></b>, add sentence at end of PNP21 after item f) to read:  <b><u>"Further development southward will not be supported where it would result in the extension of Paignton into the adjoining Neighbourhood Plan area"</u></b>.</p> <p><b><u>Agreed</u></b>, at PNP1-Annex 2 after (h) add new item to read (and renumber all subsequent items):  <b><u>"i) development will not be permitted where it would adversely affect the ecologies of Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs) or any protected or endangered species"</u></b>.</p> <p><b><u>Agreed</u></b>, replace use of "Torbay Geopark" on pages 58 (para.6.126 fourth bulletpoint) and 59 (PNP23c) with:  <b><u>"English Riviera UNESCO Global Geopark"</u></b>.</p>

Appendix 11(d) – Organisations (in alphabetical order) - Supporting the Plan for the reason where given

ID	Name	Submission received	Response summary
		<p>2. The Geopark is an important international UNESCO designation that has a holistic approach integrating and recognizing geology, wildlife, environment, heritage, culture and community. The designation covers the whole of Torbay and as such the whole of Paignton and all of its communities play an important role in helping maintaining the status. It is felt that it would be good to recognise this within the document.</p> <p>3. The GMG are pleased to see that the plan notes and considers the relevant wildlife and environment of the area in addition to its important built heritage. However, historically geological sites of significance have often been overlooked. The GMG are therefore keen for Paignton's existing two geological Sites of Scientific Interest (Roundham Head and Saltern Cove) and three RIG sites (Barcombe Mews - Shorton, Crystal Cove - Goodrington and Goodrington Quarry and Rd Cutting) be recognised and included in the plan in addition to their condition and management considered.</p> <p>4. UNESCO Global Geoparks are inspected every four years to ensure standards are being maintained and improvements made. The English Riviera's last inspection occurred during 2015. The area passed but several recommendations were made one of which was that visibility of the designation was lacking at key visitor points i.e. the three harbour areas. The GMG note plans for improvements around the seafront and harbour area (pages 33 and 34) present an ideal opportunity to consider the importance of raising the profile of and Geopark though its consideration and inclusion in the early planning stages of any developments. This could be done though interpretation panels and signage, public art/sculpture or though integration of design inspired by the Geopark into the public realm. Again, the Geopark would be happy to provide advice, help and support to the communities of Paignton with the above.</p>	<p><b>Agreed</b>, add further bullet point above Fig 6.12 page 59 to read:</p> <ul style="list-style-type: none"> <li>• <b><u>“Continued community support for the Global Geopark”</u></b>.</li> </ul> <p><b>Agreed</b>, not all sites referred to are within the Plan area. Amend PNP1 Annex 2 sub-heading to read: <b><u>“Safeguard of Biodiversity and Geodiversity”</u></b>.... Add new item after h) to read <b><u>“ j) ensure that features of geodiversity value are protected and wherever possible enhanced in their condition and future management.”</u></b>.</p> <p><b>Agreed</b>, add a further item to the above to read: <b><u>“k) include interpretation panels, signage, public art / sculpture or integration of design inspired by the Geopark into the public realm”</u></b>.</p>

**Appendix 11(d) – Organisations (in alphabetical order) - Supporting the Plan for the reason where given**

ID	Name	Submission received	Response summary
B104	Paignton Heritage Society	Recognises the key role that our local heritage opportunities can play in the improvement of our local economy and environmental enhancement.	Support and reason noted.
B011	Persimmon Homes (South West)	<p><u>Part 3 Statement of Compliance and Conformity with Torbay Local Plan</u></p> <p>The Local Plan was adopted in December 2015 and given the delicate balance needed to try and attract employment growth in to the area, the plan proposes that annual monitoring of the strategic policies be carried out. Paragraph 3.5 to 3.7 of the Neighbourhood Plan note this approach. Paragraph 3.13 states that the review of these ‘signals’ of a decline in job growth and oversupply of housing provision is a legitimate step to take into account in preparing the Neighbourhood Plan. Accordingly the plan looks at housing land supply both in the immediate and medium term and notes that there is no need to identify further sites at this stage. However whilst Torbay Council intend to publish housing monitoring information in the Summer of this year, which we note is later than required by the Local Plan and as had been advocated by the Local Plan Inspector, there is no information about the take up or loss of employment opportunities. If there continues to be a mismatch between the rate of employment growth and the housing needs caused by in migration, then the basis of both the Local Plan and the neighbourhood Plan needs to be reviewed. We are therefore of the view that to wait five years to carry out this review seems too long a period and would urge that the monitoring periods in the Neighbourhood Pan (NHP) to be reviewed to a shorter time period of two years given the lapse in employment this far.</p> <p><u>Part 4 Vision and Aspirations</u></p> <p>Paragraph 4.7 of the Plan states as an overall aim that “our community wishes to recreate our ‘Garden Town’ appeal by improving and linking our green spaces and greening the streets and buildings that connect them (90% supported). The Government’s aim behind Garden Towns is that land is publicly owed and we would suggest that if the land is in multiple ownership the ability to achieve this is somewhat impaired.</p>	<p>Support and reason noted.</p> <p>Agreed this will be the main issue for consideration by the Local Plan Review required in 2020. Whilst noting there have been no monitoring reports issued by the Council in respect of the Local Plan, the Neighbourhood Plan has sought to support the Local Plan so far as it is possible to do so until at least the first Review period involved. This is set out in detail in the Supporting Evidence and Basic Conditions documents that accompany the Neighbourhood Plan.</p> <p>Public ownership is not the only way to achieve the objective. Paradoxically of all LGS sites proposed, only those publicly owned have attracted objection from the public body only (see Appendix 11(g) Submissions C002, C003).</p>

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ID	Name	Submission received	Response summary
		<p><u>Section 6 Policies and Proposals Policy PNP 1 Annex 1 note c)</u></p> <p>Para 6.7 notes “The Local Plan proposes an additional 5,000-5,500 net growth in jobs over 18 years from a base of 59,000 in 2012 at a target of 275-300 net new jobs every year in Torbay. At present (2016), four years into the Local Plan period, jobs in Torbay have steadily dropped to 57,000 instead of having grown to 60,100”.</p> <p>Given the admission that there is a continuing drop in job growth we believe this adds further force to our comments above in part 3 about amending the plan review dates.</p> <p>There is clear evidence that Area Wide Policy PNP1 is not delivering the balanced growth intended as evidenced above. Persimmon Homes therefore object therefore to Annex 1 of PNP1 c) which states that development sites that are unused for six months or more are to be made available for the local community for food growing until developed. This is an unreasonable approach as the delays in site development may not be wholly in the developer’s control.</p> <p>Persimmon Homes also note that the policy for supporting local food production within Annex 1 need also to be balanced against the other Local Plan policy requirements and that whilst laudable the policies have to be balance against wider viability testing when the Local Planning Authority are balancing the requirements of policy against the individual case of a particular planning application. We would remind the council of the application of paragraph 173 of the NPPF in this regard.</p> <p><u>Part 6 Policies and Proposals Policy PNP 13</u></p> <p>Policy PNP13 Housing Opportunities within the Town Centre suggests key areas where residential development would be supported. The areas include Paignton harbour, Crossways, Station Lane, Station Square, and Victoria Square. However, PNP13 also states that a formal agreement will be required on the grant of planning permission that “restricts first occupation to purchasers or tenants who have lived in Torbay for more than 5 years, work in Torbay, or can demonstrate a confirmed offer of employment within Torbay”. This is a sensible and appropriate approach permitting that</p>	<p>The observation made (left) is correct.</p> <p>Comment noted.</p> <p>Leaving locations to become unproductive in contrast to meeting local need is the issue being addressed.</p> <p>Accepted that viability may be a consideration in some instances but it remains the case that NPPF173 is guidance from which departure can be allowed where appropriate to do so.</p> <p>Comment noted. By including the requirement in the Plan it will help prospective developers to factor this into the land purchase costs when seeking to show local need will be met.</p>

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		restrictions that are applied do not significantly impact the viability of the site.	
B103	Stoke Gabriel Cycle Path Group	<p><u>Policy PNP12 Getting around.</u></p> <p>While acknowledging specific references to cycle paths, including NCN routes, connectivity to and from the NP area could be further improved, for instance by extending the proposed Totnes/Stoke Gabriel riverside path to Greenway and beyond, and the suggested cycle route via Litson Lane (Stoke Gabriel) to the White Rock area, including South Devon College.</p>	PNP12 relates to the town centre and seafront area. The measures suggest are supported but appropriate to the Devon and Torbay Joint Local Transport Plan.
B102	Theatres Trust	<p><u>Policy PNP4 - Seafront</u></p> <p>The Theatres Trust supports this policy and the aim to improve the appearance of the Vue Cinemas (former Apollo/ Festival Theatre) building. In regards to the proposal to relocate the cinemas, the Trust would only support this if replacement cinemas are opened before the existing venue is closed, and that another suitable cultural/ community use is found for the existing building. This would reflect the guidance in para. 70 of the National Planning Policy Framework to ‘guard against the unnecessary loss of valued facilities and services’. With regards to the final paragraph, the Trust would normally object to the loss of a building that could be reused for another cultural use. While we recognise the benefits of opening up the sea front, and note the Princess Theatre in Torquay is to be upgraded which, together with the Palace Theatre, would likely provide for the theatrical needs of Paignton, it is important to ensure there is no other possible viable cultural use for the building before allowing its demolition.</p> <p><u>Policy PNP11 – Old Town</u></p> <p>The Theatres Trust supports this policy, particularly efforts to protect the ongoing operation of the Palace Theatre. Cultural, leisure and the arts play an important role in the local community, both for the benefits they provide to the local economy (and the visitor economy) and the social and community wellbeing of the people who live and work within the area.</p>	<p>Support and reason noted, and the caveat.</p> <p>Reason for support noted (see also Amendment Appendix 11(b) Submission A1158).</p>
B013	Torbay Green Party	Torbay Green Party supports the plan for the following reasons:	

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ID	Name	Submission received	Response summary						
		<ul style="list-style-type: none"> <li>• It promotes the delivery of net job growth before housing provision to improve and help relieve local social and economic deprivation;</li> <li>• It safeguards and enhances green infrastructure and biodiversity along with the promotion of local food within the constraints of the National Planning Policy Framework (NPPF) and the important exception of NPPF119 which mandates European birds and habitats directives in regard to the integrity of the South Hams Special Area of Conservation which covers two thirds of the Plan area;</li> <li>• It recognises the Residents Saving Victoria Park petition and the value of Victoria Park to local residents by designating the area as Local Green Space;</li> <li>• It helps protect the natural world and prevent pollution by progressing South West Water and Torbay Councils recommendations regarding surface water runoff; and</li> <li>• It supports renewable energy in, and encourages improvement in the energy efficiency of, the residential built environment to help Paignton and its residents adapt to and mitigate climate change.</li> </ul> <p><u>Changes we wish to see made to the plan</u></p> <p>Torbay Green Party`s comments are divided into two sections for each document of the plan we have responded to. Where needed, suggested deletions are highlighted in pink and suggested insertions are highlighted in green</p> <p><b>1. Paignton Neighbourhood Plan (main document)</b></p> <table border="1" data-bbox="454 1098 1653 1345"> <thead> <tr> <th data-bbox="454 1098 846 1161"></th> <th data-bbox="857 1098 1249 1161">Suggested Enhancement/Change</th> <th data-bbox="1261 1098 1653 1161">Reason</th> </tr> </thead> <tbody> <tr> <td data-bbox="454 1169 846 1345">6.17 <b>Policy PNP1 – Area Wide Policy</b> Paragraph e) Page 17</td> <td data-bbox="857 1169 1249 1345">Amend policy to: ‘...and encouraging community-led housing enterprises...’</td> <td data-bbox="1261 1169 1653 1345">Additional wording ensures that the power for change lies with Paignton residents of the Neighbourhood Area to accord with definitions in <b>Appendix 1 Glossary of Terms</b>, page 98</td> </tr> </tbody> </table>		Suggested Enhancement/Change	Reason	6.17 <b>Policy PNP1 – Area Wide Policy</b> Paragraph e) Page 17	Amend policy to: ‘...and encouraging community-led housing enterprises...’	Additional wording ensures that the power for change lies with Paignton residents of the Neighbourhood Area to accord with definitions in <b>Appendix 1 Glossary of Terms</b> , page 98	<p>Support and reasons noted.</p> <p><b>Agreed</b>, the change clarifies the Policy. At PNP1e) add text to read “...and encouraging community-led housing enterprises...”.</p>
	Suggested Enhancement/Change	Reason							
6.17 <b>Policy PNP1 – Area Wide Policy</b> Paragraph e) Page 17	Amend policy to: ‘...and encouraging community-led housing enterprises...’	Additional wording ensures that the power for change lies with Paignton residents of the Neighbourhood Area to accord with definitions in <b>Appendix 1 Glossary of Terms</b> , page 98							

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ID	Name	Submission received		Response summary	
		<u>Appendix 1 Glossary of Terms</u> Page 98	Add Term: <b>Community-Led Housing Enterprises</b> ; and Definition: <b>Community-led solutions to housing need which let residents within the plan area take a stake in their home or co-op and keep the homes permanently affordable.</b>	As above	<b>Agreed</b> , add following text to Appendix 1 Glossary: <b><u>“Community-led Housing Enterprises: - Community-led solutions to housing need which let residents within the plan area take a stake in their home or co-op and keep homes permanently affordable.”</u></b>
		6.45 <b>Annex 1 to Policy PNP1</b> <u>Local Green Space</u> Page 20	Amend paragraph: ‘... this Neighbourhood Plan (Fig.6.4 2, Table 6.21 and shown in Part 7 of this Plan)... ’	to reflect correct table and figure on pages 24 & 25 respectively.	<b>Agreed</b> , make correction to referencing error PNP1 Annex 1 under sub-heading “Local Green Space” to read correctly as: <b><u>“...in this Neighbourhood Plan (Fig 6.2, Table 6.1 and shown in Part 7 of this Plan).....”</u></b>
		6.45 <b>Annex 1 to Policy PNP1</b> <u>Local Food</u> Paragraph a) Page 20	Amend paragraph: ‘...at Little Blagdon Farm (and farmhouse) <b>and</b> Great Parks <b>and Parkfield</b> delivered by a... ’	To ensure the local food policy serves all Paignton residents across the Plan area.	This would conflict with Parkfield being in the Core Tourism Investment Area of Policy PNP14.
		6.45 <b>Annex 1 to Policy PNP1</b> <u>Local Food</u> Paragraph c) Page 21	South Devon College, <b>and</b> Great Parks	Improved readability	<b>Agreed</b> , improves readability. Amend text of Annex 1 under Local Food at item c) to read: <b><u>“ South Devon College, <del>and</del> Great Parks and Collaton St. Mary .....”</u></b>

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ID	Name	Submission received		Response summary	
		6.51 <b>Annex 3 to Policy PNP1 Water risks locally</b> Page 29	Suggest deleting 'In addition' and start sentence with <b>The</b>	Improved readability	This would detract from emphasizing that two flooding reasons for care are involved, not just one.
		6.53 <b>Annex 3 to Policy PNP1 Water risks locally</b> Page 29	Suggest deleting 'In addition to' and insert <b>Besides</b>	Improved readability	This would detract from emphasizing that two flooding reasons for care are involved, not just one.
		6.45 <b>Annex 1 to Policy PNP1 Rural Character Area</b> Paragraph c) Page 20	Amend policy to: small-scale food growing <b>and rearing</b> opportunities	To avoid confusion or bias in regard to the method of food production and ensure arable and pasture are both included in the policy.	<b>Agreed</b> , amend PNP- Annex 1 under sub-heading “Rural Character Area” item c) to read <b>“...food growing and rearing”</b> <b>Also</b> amend PNP23 f) to read <b>“.....small-scale farming food growing and rearing.....”</b> .
		<b>Appendix 1 Glossary of Terms</b> Page 102	Amend <b>Term Small-Scale Farming</b> to read: <b>Small-Scale Food Growing And Rearing</b>	Change required to accord with related term used in the Policy 6.45 (as amended above) <b>Annex 1 to Policy PNP1</b> Rural Character Area Paragraph c) Page 20.	This also impacts on PNP23 where the term “small-scale farming” is also used (see Appendix 11(a) Submission A151 above).  <b>Agreed</b> , keep heading in Appendix 1 Glossary as “Small-Scale Farming” but with an amended text to read: <b>“Small scale farms (food growing and or rearing), market gardens, agro forestry, allotments, underplanted orchards or</b>

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					<i>horticultural holdings of 68 hectares or less.</i>
		6.45 <b>Annex 1 to Policy PNP1 Local Food</b> Paragraph c) Page 21	Amend policy to: ...in White Rock, Roselands, South Devon College, <del>and</del> Great Parks and Collaton St. Mary in accord with Policies PNP19, <del>and</del> PNP20, <b>PNP21, PNP24 and PNP27</b>	Improved readability and cross referencing. To accord with suggested changes below.	<b>Agreed</b> , improves readability and cross referencing. Amend text of PNP1 Annex 1 under Local Food at para c) to read: “ <i>in White Rock, Roselands, South Devon College, <del>and</del> Great Parks and Collaton St. Mary in accord with Policies PNP19, <del>and</del> PNP20, <b>PNP21, PNP24 and PNP27;</b></i> ”.
		<b>Collaton Village and its environs</b> Objectives:	Add objective: <b>Provide safe, continuous, cycling and pedestrian pathways that link key locations that include school positions, community facilities, employment locations and strategic longer links across open countryside to Totnes working with local landowners, Devon County Council and other authorities. (Stage 2 additional comments)</b>	To accord with <b>Policy PNP22 – Western Corridor</b> paragraph c) page 57  N.B. See suggested policy change below.	Unnecessary duplication of Policy PNP22 a) and c) especially and its supporting text.
		6.138 <b>PNP24 – Collaton St. Mary Village</b>	Add new paragraph to policy and amended punctuation: <del>and</del>	To ensure <u>Local Food</u> policy is cross referenced and serves all Paignton's residents	<b>Agreed</b> , add text (with amendment shown underlined) to read: “ <b><u>k</u></b> <b><i>add allotments and orchard</i></b> ”

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		Page 61	j) gives priority at all times to meeting the needs of local residents; k) add allotments and orchard spaces for community use; and		<u>spaces for community use where achievable;</u> “
		6.138 Policy PNP24 –Collaton St. Mary Village Page 61	Add new paragraph to policy: l) the establishment of a strategic, continuous, separate cycling and pedestrian pathway across open countryside to Totnes working with local landowners, Devon County Council and other involved authorities.	To accord with <b>Policy PNP22 – Western Corridor</b> paragraph c) page 57	Unnecessary duplication of Policy PNP22 a) and c) especially and its supporting text.
		6.150 Policy PNP27 – Preston Page 64	Add new paragraphs to policy and amended punctuation: and d) increase the provision of community facilities in the top part of Preston, to include a community café. k) add allotments and orchard spaces for community use particularly at Parkfield; and l) provide modern stable facilities at Parkfield for community and tourist use.	To ensure: <u>Local Food</u> policy is cross referenced and serves all Paignton’s residents; and make more of the tourist and community offer in regard to animal husbandry.	<b>Agreed</b> , except for allotments at Parkfield that would conflict with the intent of Policy PNP14 Core Tourism Investment Area. Add text to PNP27 to read:- <b><u>“e) add allotments and orchard spaces for community use ; and f) provide modern stable facilities at Parkfield for community and tourist use.”</u></b>
		6.48 Annex 2 to Policy PNP1	Amend section to read:	Specific commercial development design policies	Mixing two major land uses in the manner proposed is confusing.

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		<p><b>Design Guide</b> Page 28</p>	<p>Residential <b>and commercial facilities</b> n) support in particular will be given to <b>commercial or residential development that will achieve Passivhaus or EnerPHit standards; and residential development that will achieve Lifetime Homes standards, subject to...</b></p>	<p>are not covered in the Plan</p>	<p><b>Agreed</b>, by adding new sub-section after “Residential facilities” sub-section, to read: <b><u>“Commercial facilities:</u></b> <b><u>a) support in particular will be given to developments that will achieve a high standard of energy use efficiency; and</u></b> <b><u>b) provision of out of sight waste storage in seagull proof structures for not less than two wheelie bins of 1100 litre in size for each commercial unit proposed.”</u></b></p>
		<p>6.48 <b>Annex 2 to Policy PNP1 Design Guide</b> Page 28</p>	<p>Amend section to read: p) provide space for solid waste storage within each curtilage, in seagull proof structures sufficient to accommodate two wheelie bins of 240 litre size <b>or in the case of commercial development 1100 litre size;</b></p>	<p>As above</p>	<p>Included in amendment above.</p>
		<p>6.48 <b>Annex 2 to Policy PNP1 Design Guide</b> Page 28</p>	<p>Insert new section: <b>Sustainable Transport</b> <b>xx) locate all car access at the periphery of the development with electric vehicle charging</b></p>	<p>To provide more climate-friendly and healthy options for residents to get around, accord with the hierarchy of sustainability, and NPPF35.</p>	<p>Too prescriptive as proposed. <b>Agreed</b>, insert new section into Annex 2 with additional changes emboldened: <b><u>“Sustainable transport”</u></b> <b><u>“a) wherever possible locate all</u></b></p>

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			<p>points                      xx) provide comprehensive direct networks for walking, cycling and public transport within and beyond the development                      xx) where on site roads are planned, utilised or provided schemes must include</p> <ul style="list-style-type: none"> <li>i) car-free areas within the development;</li> <li>ii) shared space streets and squares;</li> <li>iii) on street secure cycle storage; and</li> <li>iv) dedicated space for car-club transport.</li> </ul>	<p>car access at the periphery.....then as wording proposed to left in green) “.</p>
		<p>6.53  <b>Annex 3 to Policy PNP1</b>  <b>Water risks locally</b>                      Page 29</p>	<p>Add: ‘... the Western and Northern Areas of Paignton is an are areas...’</p>	<p>Investigations by Torbay Council and South West Water in 2014 recognised that not only are <u>both</u> areas experiencing increasing flooding, spills and outflows as a result of insufficient spare capacity in the existing outlying network of combined (surface and foul) sewers but both western and northern Paignton ‘should be identified for their</p> <p><b>Agreed</b>, makes the extent of the capacity problem more clear. Amend text of para 6.53 to read: “...the Western <b>and Northern areas</b> of Paignton are areas of.....”.</p>

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				potential to achieve more than sustainable drainage improvements.’ Reference: Torbay Council and South West Water (July 2014), Torbay 2032 An Assessment of Future Sewer Capacity in Torbay. Pages 20 & 25
		6.56 <b>Annex 3 to Policy PNP1 Surface Water</b> Page 29	Add ‘Developments within the Rural Character Area and Preston defined in Policy Policies PNP19 and PNP27’ to first paragraph of policy.	As policy improvement above.  <b>Agreed</b> , and already covered by amendment Appendix 11(d) in response to Submission B002 above.
		6.86 <b>Policy PNP11 – Old Town</b> Page 41	Add new paragraph to policy and amend punctuation accordingly: and f) remove street clutter and eyesores that detract from the area; and g) stop off northern Well Street – Colley End junction and pedestrianise the Well Street area.	Ensure the wishes of Well Street residents, who have petitioned the council in this regard, are embraced in the plan. N.B: a commodious alternative route to Church Street is available by provision of a right turn at Torquay Road to Hyde Road traffic lights.  Though supported as a justifiable need, specific highway changes of this type are not within the remit of a Neighbourhood Plan. <b>Agreed</b> , amend PNP11 d) by adding text to read: “.....and improvement of residential amenity in Well Street; .....” (see similar request Appendix 11(a) Submission A083).
		<b>Table 6.1 Local Green Space locations</b> Page 25 &26	Add <b>PLGS.63: Ramshill Copse</b>	Ramshill Copse is an important area of biodiverse ancient woodland central to the Ramshill County Wildlife Site  <b>Agreed</b> , appropriate to add Ramshill Copse area to PLGS.57 Westerland Valley with corresponding amendments

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			CP Area <b>B</b>	and one of only 3 areas of ancient woodland in the Plan.	required to the Plan and Supporting Evidence documents. No change to Table 6.1 necessary.
		<b>Table 6.2: Local Green Spaces</b> Page 24	Add <b>PLGS.63</b> with relevant green triangle	As policy change above	As above – no change necessary.
		<b>Blatchcombe – Designated Local Green Space</b> Page 91/92	Add <b>photo</b> (see below)  and <b>map</b> (c/o Plan authors) <b>PLGS.63 – Ramshill Copse, Higher Ramshill Lane</b>	As policy change above	As above.
		<b>Appendix 1 Glossary of Terms</b> Page 98	Term <b>Code for Sustainable Homes</b> Definition <b>More energy efficient, use less resources, power, water.</b>	Term not used in text of the plan policy document to which it refers therefore remove.	<b>Agreed</b> , remove from Appendix 1 Glossary as redundant text.
		<b>Appendix 1 Glossary of</b>	Term	This important definition not	The meaning of “net growth”

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		<p><b>Terms</b> Page 101</p>	<p><b>Net job growth</b></p> <p>Definition An increase in the jobs provision within Torbay, using ONS data, above the Local Plan 2012 baseline of 59,000. Within The Paignton Neighbourhood plan area all jobs provision, irrespective of the baseline, is required, by Policy PNP1, to be permanent full time and well paid. N.B. To calculate net <i>additional</i> jobs growth over a given period of time:</p> <ol style="list-style-type: none"> <li>1. record job numbers at start of period</li> <li>2. over the same period deduct total number of redundancies, closures, retirements &amp; other job losses; and add total jobs created and vacancies filled</li> <li>3. The result is the net additional jobs if greater than 1) or the net loss of jobs if less than 1)</li> </ol>	<p>included in the Draft Glossary</p>	<p>already in Appendix 1 to the Plan is sufficient. It applies both to the measurement of dwelling numbers as well as jobs and is easier for the reader to understand.</p>

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		1. Supporting Evidence (Document 3)			
			<b>Suggested Enhancement/Change</b>	<b>Reason</b>	
		<b>Figure 2.5.3: SSI'S and other Nature Conservation Sites</b> Page 23	Insert box with arrow for Ramshill Copse (as those for Occombe Woods and Clennon Valley)	Ramshill Copse is an important area of biodiverse ancient woodland central to the Ramshill County Wildlife Site and one of only 3 areas of ancient woodland in the Plan.	<b>Agreed</b> , adds to understanding of the site location. Amend Fig 2.5.3 of Supporting Evidence document as proposed.
		<u>Ancient Woodland</u> Page 24	Amend to: There are 2 3 within the designated Pan Plan Area  Ramshill Copse	Increase number to show the total number of Ancient Woodland sites within the plan. Correct typo and add Ramshill Copse	<b>Agreed</b> , accuracy improvement.
		2.5.11 Page 24	Amend to: ...location of both all three are...	As change above	<b>Agreed</b> , accuracy improvement.
		<u>Wetlands</u> Page 24	Amend to: ...and dices ditches	Correct typo	<b>Agreed</b> , accuracy improvement.
		<u>Listed Buildings</u> second line Page 24	Amend to: ...including 1 Grade 1 building	Correct typo	<b>Agreed</b> , accuracy improvement.
		<u>Listed Buildings</u> third line Page 24	Amend to: ...and 4 7 Grade II* ...	To accord with number of <b>Grade II* listed buildings</b> shown in <b>Table 2.5.1 Listed Buildings and other heritage features</b> , page 25	<b>Agreed</b> , accuracy improvement.

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		A5.16 <u>References:</u> Page 106	Add a reference: (9) Reference: R. Angell, February 2015, <i>Statutory &amp; non-statutory sites within 1km of road widening (Devon Biodiversity Records Centre), Kings Ash Road (Ramshill Road to Churscombe Cross), Paignton, Ecological Appraisal for Torbay Council, Devon Wildlife Consultants, p 64.</i>	As change above	<b>Agreed</b> , information improvement for addition to Supporting Evidence document under “References” listed on pages 105/106.
		<b>Table A5.3 Local Green Space designations proposed</b> Page 106 and 107	Add <b>PLGS.63: Ramshill Copse</b>  CP Area <b>B</b>	As change above	Included with PLGS.57 Westerland Valley (see amendment above) – plus notifying land owner.
		A5.19 Page 107	Amend paragraph in regard to suggested addition of Ramshill Copse as Local Green Space. The calculations will need alteration to account for the size (and percentage) of this change	As change above	As above - no other change required.
		<b>Schedule A5.1: Stage 1 Summary</b> Page 116	Insert Column: <b>PLGS.63 Ramshill Copse, Higher Ramshill Lane</b> and amend the schedule accordingly	As change above	<b>Agreed</b> , accuracy improvement.
		<b>Schedule A5.2: Stage 1 Summary</b> Page 140	Amend <b>Local in Character</b> paragraph to: ‘1 of only <b>2 3</b> areas of...’ and insert space	To update schedule as a result of <b>PLGS.63</b> Ramshill Copse addition and improve legibility	<b>Agreed</b> , accuracy improvement.

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ID	Name	Submission received			Response summary
		Schedule A5.2: Stage 1 Summary Page 148	after ‘...Natural England’ Amend <b>Local in Character</b> paragraph to: ‘...Valley 1 of only 2 3 areas...’	To update schedule as a result of <b>PLGS.63</b> Ramshill Copse addition	<b>Agreed</b> , accuracy improvement.
		Schedule A5.2: Stage 1 Summary Page 117-178	Add <b>PLGS.63 Ramshill Copse, Higher Ramshill Lane</b> with photo (see above) and map (c/o Plan authors) <b>Size:</b> Abt 3 ha <b>Ownership:</b> Private <b>Community Partnership</b> <b>Area:</b> Blatchcombe <b>In reasonably close proximity to the community served:</b> Serves surrounding residential areas and bay-wide tourist centres <b>Why demonstrably special to the community served:</b> Visual wooded beauty from distant vantage points situated within key landscaped valley used for nature conservation, food production, amenity, relaxed leisure and countryside pursuits <b>Local in character:</b> Tranquil attractive biodiverse <sup>(1)</sup> <sup>(4)</sup> local green space at centre of Ramshill County Wildlife site <sup>(1)</sup> . 1 of only 3 areas of ancient and	As policy change above	Included with PLGS.57 Westerland Valley (see amendment above).

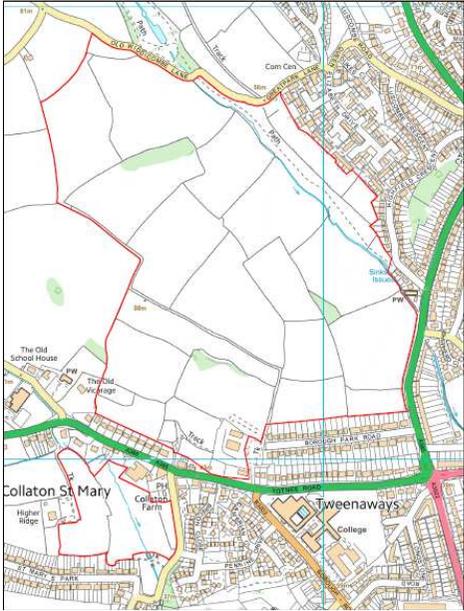
Appendix 11(d) – Organisations (in alphabetical order) - Supporting the Plan for the reason where given

ID	Name	Submission received	Response summary
		<p>semi-natural woodland (considered by Natural England to be the highest value for nature conservation) within Paignton<sup>(9)</sup>.</p> <p><b>Other relevant information:</b> Recognised under Local Plan Policy C1 Countryside and located within County Wildlife Site. No other designations.</p>	
		<p><u>Conclusion</u></p> <p>Thank you for considering the views of Paignton`s residents over the five years it has taken to produce this development plan and for all the dedicated work, time and knowledge invested in drafting and producing the pre-final set of 6 documents.</p> <p>Torbay Green Party looks forward to the upcoming local referendum to mandate the Final Paignton Neighbourhood Plan and a further chance to give our support.</p>	Support and reason noted.
B004	Torbay & South Devon Trades Council (TUC)	<p>A very comprehensive piece of work.</p> <p><u>PNP15, 6.93, 6.94 Flooding &amp; Sea Defences</u></p> <p>There should be a defined planning arrangement (Dated Town Centre Sewer Network) for these issues to be addressed at the completion of the Paignton Neighbourhood Plan.</p> <p>We do not wish for this document to be sitting on a shelf getting dusty.</p>	<p>Support and reason noted.</p> <p>The policy will come into effect following approval at Referendum and 'making' of the Plan in accordance with the timetable defined by the Regulations.</p>
B108	Whitehill Country Park	<p>We own Whitehill Country and fully support the proposed plan to make the Yalberton Valley a Country Park for tourist and locals to enjoy.</p> <p>The red line on plan 6.130 includes our woodland and also a development of our glamping pods. We</p>	Support and reason noted.

**Appendix 11(d) – Organisations (in alphabetical order) - Supporting the Plan for the reason where given**

ID	Name	Submission received	Response summary
		feel the red line is too close to our shower block and extends beyond the edge of the woodland on to existing pitches on the campsite. Also, as our glamping pods are very popular and co-exist harmoniously with the woodland extremely well, we would like to have the option to further develop our eco glamping pods sympathetically on the edge of the woods whilst retaining all the woodland environment.	Boundary line excludes shower block and existing pitches as sought.
<b>Total</b>	<b>9</b>	<b>Respondents</b>	

**Appendix 11(e) – Organisations (in alphabetical order) - Not supporting the Plan for the reason where given**

ID	Name	Submission received	Response summary
B009	Boyer, on behalf of Bloor Homes (South West Ltd)	<p>On behalf of our client, Bloor Homes Ltd, Boyer is instructed to submit representations in response to the Pre-Submission consultation on the Paignton Neighbourhood Plan (PNP).</p> <p>Our comments are provided in the context of land to the north and south of Totnes Road, Collaton St. Mary, which is under the control of Bloor Homes (see enclosed Site Plan provided below). This area forms part of the Paignton North and West Area Future Growth Area in the adopted Torbay Local Plan (December 2015), Collaton St Mary Masterplan Supplementary Planning Document (SPD) (February 2016) and is identified as Area D and B respectively at Figure 7.5 of the PNP.</p> 	<p>Subsequent enquiry of the respondent confirmed that the “control” of the land referred to is in the form of an option to purchase.</p> <p>Relevant to note the Future Growth Area boundary shown in the Local Plan (and referred to left) has been corrected in the Neighbourhood Plan in discussion with the Council to reflect the Masterplan quantum that was amended from 800 to 460 dwellings as a result of the Local Plan Examination in Public (see Appendix 4 Basic Conditions Statement and Document 7 referred to). The bulk of the land shown left no longer forms part of the development area identified in the Masterplan SPD adopted by the Council in February 2016.</p>

**Appendix 11(e) – Organisations (in alphabetical order) - Not supporting the Plan for the reason where given**

ID	Name	Submission received	Response summary												
		<p><b>Adopted Local Plan and Masterplan Context</b></p> <p>Our comments seek to ensure that the PNP provides an appropriate, flexible and positive local policy response, which facilitates development in accordance with the provisions and objectives of the adopted Torbay Local Plan and the National Planning Policy Framework (NPPF) (March 2012). Upon adoption, the PNP will form part of the statutory Development Plan, therefore, it is essential that the PNP supports the wider objectives, in terms of the delivery of sustainable patterns of development, of the spatial strategy established in the adopted Local Plan.</p> <p>The Paignton North and West Future Growth Area comprise five broad areas. The land at Totnes Road (SDP3.3) is identified to deliver 460 dwellings over the Plan period in line with the following delivery profile (See Table 16: SDP3: Paignton North and Western Area – Key sites for housing):</p> <table border="1" data-bbox="472 823 1005 1018"> <thead> <tr> <th>Years</th> <th>No. Dwellings</th> </tr> </thead> <tbody> <tr> <td>1-5</td> <td>0</td> </tr> <tr> <td>6-10</td> <td>62</td> </tr> <tr> <td>10-15</td> <td>104</td> </tr> <tr> <td>16-18</td> <td>294</td> </tr> <tr> <td>Total (18yrs)</td> <td>460</td> </tr> </tbody> </table> <p>In February 2016, the Council adopted the Collaton St. Mary Masterplan SPD (which does not form part of the Development Plan but is a material consideration). The Masterplan is intended to help to deliver a robust and coherent long term development for the village in a manner that meets the objectives of the adopted Local Plan.</p> <p>However, the Masterplan is clear in its purpose in that it demonstrates how the village can evolve in a sustainable way but that there are also likely to be other means of achieving its strategy through the implementation of different details by other parties when delivering the various aspects of the</p>	Years	No. Dwellings	1-5	0	6-10	62	10-15	104	16-18	294	Total (18yrs)	460	<p>The requirements expected of the Neighbourhood Plan are those defined by the Basic Conditions, which have been met in full as evidenced in detail in the Basic Conditions Statement that accompanies the Neighbourhood Plan.</p> <p>It must be noted that Table 16 (referred to left) is identified in the Local Plan as an “estimated delivery” profile, not an absolute one.</p> <p>The Masterplan as adopted no longer includes the same area for potential development as assumed in the Local Plan at SPD3.3. The Neighbourhood Plan takes account of this in the review undertaken</p>
Years	No. Dwellings														
1-5	0														
6-10	62														
10-15	104														
16-18	294														
Total (18yrs)	460														

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		<p>masterplan.</p> <p>It is therefore not an approach which developers are expected to strictly adhere to; rather it aims to guide and influence how development could be brought forward. Nonetheless, it demonstrates that the scales of growth set out in the adopted Local Plan for Collaton St. Mary can be achieved in a manner that is consistent with the objectives of the Local Plan.</p> <p>The delivery of new homes within Paignton, and specifically, Collaton St Mary must be considered in this context.</p> <p><b>Compliance with the Local Plan and Masterplan</b></p> <p>The NPPF is clear that local planning authorities should plan positively to boost significantly the supply of housing, based on an understanding of Objectively Assessed Need (OAN) (Paragraph 47) and that planning should proactively drive and support sustainable development and respond positively to wider opportunities for growth, ensuring that sufficient land which is suitable for development is available (Paragraph 17).</p> <p>In these terms, the Local Plan is required to deliver about 8,900 new homes over the Plan period, equating to an average annual requirement of 495 new homes per year. It should be noted that the Inspector's Report on the Examination of the Local Plan acknowledges that the full OAN for Torbay is in the order of 12,300 homes. However, due to environmental constraints, the Inspector accepted that it was pragmatic to plan for 8,900 additional dwellings over the Plan period. This is an important consideration given the role that Neighbourhood Plans have to play in implementing Local Plan policy within Torbay. Accordingly, the PNP should implement a sufficiently positive and flexible policy framework so as not to hinder and/or delay the delivery of sustainable housing growth in line with Local Plan requirements (which are less than OAN).</p> <p>In this regard, the PNP should clearly reference the Collaton St. Mary Masterplan given that it</p>	<p>and published, with no objection from the local planning authority.</p> <p>Both the Local Plan and Masterplan SPD make it clear that substantial constraints of infrastructure and habitat protection must first be resolved as also explained in the Neighbourhood Plan documentation.</p> <p>Court decisions have made it clear that this narrow view of NPPF47 is not correct.</p> <p>The Local Plan and its Examination in Public established that the figure of 8,900 is based on significant uncertainty requiring formal Review at not more than 5-yearly intervals. The next Review date is 2020. The Neighbourhood Plan has correctly taken this into account.</p> <p>The document set already contains</p>

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		<p>demonstrates how the Local Plan requirement for new housing could be achieved around Totnes Road whilst also setting out a flexible approach to development where such opportunities would represent sustainable patterns of growth.</p> <p>However, worryingly, there is no reference in the PNP to the need to provide for flexibility to respond positively to new residential development, or specifically, how this could be delivered around Collaton St Mary (as set out by the Masterplan).</p> <p>It is therefore suggested that subsequent drafts are amended to reflect to the context set by the Local Plan, the requirement to adopt a positive and flexible approach to new residential development to help meet OAN and the guidance provided by the Masterplan.</p> <p><b>Phasing</b></p> <p>The PNP (Table 8.1) sets out a programme for phasing of development in Collaton St. Mary. It states that 90% of the proposed number of homes (418 homes) in Collaton St Mary should be delayed until 2027-2030.</p> <p>These phasing conclusions are justified on the basis that job growth across the Torbay Plan area has failed to deliver the annualised increase in jobs. It references Local Plan Policy SS1, which identifies that the objective is to create around 275-300 net additional jobs per annum over the Plan period to 2030.</p> <p>Whilst the objective to seek balanced growth is understood, the approach suggested by the PNP is reliant solely on the fact that new homes and jobs must be fully in alignment. This is overly simplistic means of considering this matter.</p> <p>Reference to this is made in the Local Plan Inspector’s Report at Paragraph 26, which states:</p> <p><i>‘Realistically, however, it is not possible to get such a clear and direct link. Clearly there is a relationship between jobs and homes in an area but it is not one that lends itself to precise</i></p>	<p>the reference sought in numerous places.</p> <p>The review conclusions set out comprehensively why there has been found no need to identify further sites.</p> <p>As above.</p> <p>Table 8.1 is not as stated, nor has it been assembled solely on the basis stated. It sets out phasing <u>conclusions</u> reached from the review undertaken as evidenced comprehensively in the document set, which also included taking properly into account the significant infrastructure and legally protected habitat requirements identified in the Local Plan and it’s supporting documents. To have approached the review in any other way would have been deficient.</p>

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		<p><i>calculation.'</i></p> <p>The Inspector continues by advising that:</p> <p><i>'Critically, in an area like Torbay where economic performance has been poor in recent years, there is a danger that firms would be reluctant to move to the area or expand in the area if they fear that housing to support job creation will not be provided in a timely fashion.'</i></p> <p>Accordingly, the Inspector recognised and supported Torbay Council's approach to housing delivery in that there was a need to provide for new residential development notwithstanding the economic performance of the Torbay area. Indeed, the Council's strategy as set out in the Plan, was based on the assumption that net job growth would not pick up until 2016, and that <i>'the recent lack of substantial net job growth does not negate the Council's strategy'</i>. The Inspector acknowledged that:</p> <p><i>'The danger of housing growth not being matched by jobs growth is outweighed by the advantage of support for the Council's growth strategy and the confidence the strategy may bring to those looking at the area for investment opportunities.'</i></p> <p>Thus, it was accepted that job growth up to 2016 would not meet the annualised requirement, but that this was anticipated during the Examination in Public to the Local Plan with the Council's response being not to delay housing delivery but rather emphasise the early delivery of sites as part of the wider growth strategy.</p> <p>The approach put forward by the PNP runs contrary to the approach adopted by the Local Plan, which clearly identified the need to bring forward housing in advance of job creation/opportunities. By delaying any housing growth around Collaton St Mary until the end of the plan period could therefore mean that any possible employment growth would be limited given the lack of housing supply. This would mean that the Council's growth strategy would not be achieved.</p> <p>This PNP proposed approach to phasing severely undermines the Council's strategy and defies the</p>	<p>As observed by another nationally recognised house builder, the imbalance between jobs and homes that now exists locally requires urgent review of the Local Plan. (Persimmon Homes South West, Appendix 11(d) above Submission B011).</p> <p>The selective approach to quotations from the Inspector's report masks the full picture which included the Inspector recognizing that if net job growth failed to materialise it would be appropriate to reduce housing provision to ensure a sustainable balance.</p> <p>The provision of housing in advance of job growth has now been achieved as comprehensively documented in the Neighbourhood Plan document set.</p>

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		<p>wider objectives of the adopted Local Plan, the Masterplan SPD and the NPPF in terms of boosting significantly the supply of housing and economic growth.</p> <p>Indeed, it is counter intuitive to the key objectives set out in the PNP in terms of delivering new jobs and economic growth. As currently proposed, the PNP is not considered to provide a sufficiently positive framework within which it can deliver its aspirations for both new homes and job growth.</p> <p><b>Housing Land Supply</b></p> <p>Moreover, to delay housing delivery as suggested by the PNP has wider implications. The NPPF (paragraph 47) requires that local planning authorities maintain an adequate supply of housing to ensure that it can provide five years' worth of housing against their requirements. The Future Growth Areas represent a key component in the planned delivery of housing and form a central plank of the strategy to ensure that the Council is able to satisfy its five year land supply obligations.</p> <p>However, the phasing delay suggested by the PNP would undermine the ability of Torbay Council in meeting its five year housing land supply requirement. The consequences of not doing so may result in speculative planning applications for development premised on unmet need. This will result in sites coming forward for development on land which is not allocated for development unlike the Future Growth Areas. It also means that the significant work undertaken by the Council in terms of the Local Plan and Masterplan becomes defunct. It is therefore critical that the Neighbourhood Plan positively considers, rather than constrains, development and responds with sufficient rigor to support proposals that are consistent with the objectives of the Local Plan (and the supporting SPD) in order to maintain an adequate supply of housing.</p>	<p>As above.</p> <p>As above.</p> <p>As above. Table 8.1 has been misconstrued as already noted above.</p> <p>As above. The Neighbourhood Plan does not propose a delay. It concludes with evidence that delay is arising because the lack of job growth, infrastructure problems and protected habitat requirements are proving to be far more important than previously assumed at the Local Plan examination stage.</p>
		<p><b>Housing Affordability</b></p> <p>A constrained housing delivery programme in the short term also fails to address, and will actually compound, affordability issues. A review of the 'Supporting Evidence' document (Doc 3) for the Local Plan fails to provide or consider matters related to housing affordability. It should be noted</p>	<p>As evidenced in the document set, the primary problem is the lack of jobs locally, not housing, that is</p>

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		<p>that the updated Exeter and Torbay Housing Market Assessment 2011 identified a need for 820 dwellings a year in Torbay of which 60% were identified as needing to be affordable. Whilst it is acknowledged that achieving such levels of growth is likely to be unrealistic, it does reinforce the urgency and responsibility of the Development Plan (including Neighbourhood Plans) to address as far as possible the affordability crisis and ensure that policy requirements/objectives do not result in scenarios whereby matters of affordability are exacerbated.</p> <p>This is recognised by the PNP, which includes a stated objective to <i>'increase the amount of local housing and meet local need'</i> (Page 16). However, the proposed delay in bringing forward housing critical to addressing affordability will only exacerbate this problem.</p> <p><b>Local Plan Review</b></p> <p>There is also a concern that the PNP is seeking to push back the delivery of the Future Growth Area beyond the Local Plan review dates in the hope that by deferring the release of sites it will mean that, as part of the review process, land currently identified in the adopted Local Plan, could be reviewed and potentially de-allocated. In this regard, we note that paragraph 2.4.7 of the Evidence Paper states:</p> <p><i>'If net job growth exceeds expectation, the plan enables an increase in pace of housing provision within Torbay's remaining environmental capacity. Conversely, if net job growth is less successful, the plan enables revisions of housing growth downwards to ensure a sustainable balance is maintained (Local Plan 1.1.15 and 7.5.17)'</i></p> <p>The PNP - as currently prepared - appears to be predicated on the conclusion that job growth between 2012 and 2016 has failed to meet expectation and therefore housing delivery should be delayed until it aligns with job growth. We have already set out why we consider that this is an errant approach in terms of economic growth.</p> <p>This approach is also inconsistent with the NPPF and the need for positive plan making.</p>	<p>driving the affordability problem. The 2011 Assessment referred to was superseded by the 2013 Assessment.</p> <p>Table 8.1 has been misconstrued as previously explained above.</p> <p>As above.</p> <p>It appears not to be understood that this is what the adopted Local Plan correctly says, and which the Neighbourhood Plan rightly has regard to.</p> <p>As above.</p> <p>As above.</p>

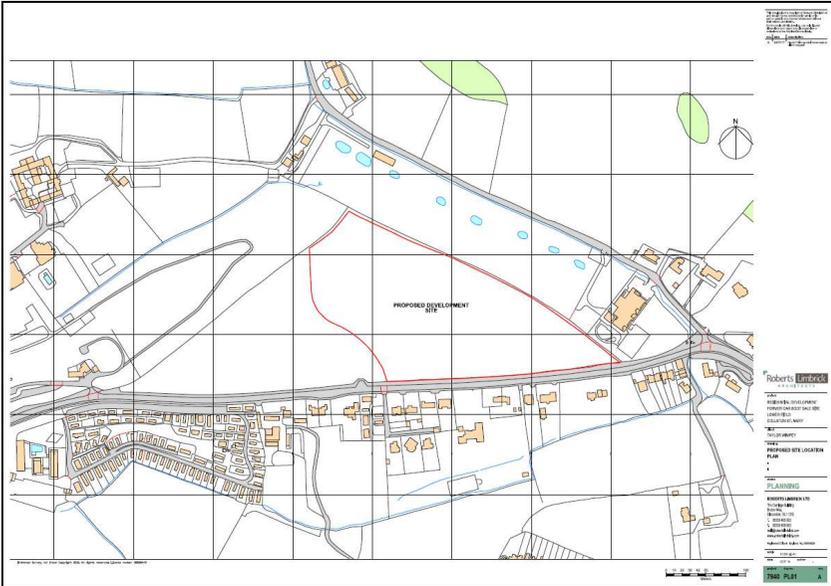
**Appendix 11(e) – Organisations (in alphabetical order) - Not supporting the Plan for the reason where given**

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		<p>The PNP should provide a positive, flexible policy framework to deliver the objectives of the Local Plan and to provide a delivery mechanism for site delivery, guided by the adopted Collaton St Mary Masterplan. At present, it does not facilitate growth in a timely manner nor does it provide any scope in terms of flexibility to support wider opportunities for development, where such opportunities would support the objectives of the Local Plan, the adopted Masterplan and those set out in the PNP.</p> <p><b>Conclusions</b></p> <p>In summary, it is considered that the overarching objectives of the adopted Local Plan have not been met by the current draft of the PNP. Its approach to delay development in the Future Growth Area until the final stages of the plan period is contrary to local policy and national guidance. This is because:</p> <ul style="list-style-type: none"> <li>• It fails to recognise and respond positively to the requirements to maintain an adequate supply of housing land to ensure that Torbay is able to satisfy its land supply obligations;</li> <li>• It does not provide sufficient flexibility to engender economic growth; and</li> <li>• It does not respond to identified affordable housing needs thereby exacerbate affordability issues.</li> </ul> <p>Given this, we question whether it can be genuinely demonstrated that the PNP, as currently drafted, satisfies the basic conditions upon which the Plan will be assessed as set out at paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended).</p> <p>By failing to plan positively for housing growth, and by proactively seeking to delay the delivery of new homes, the PNP runs counter to the principle objectives of positive plan making set out in the NPPF relative to sustainable economic development and the supply of housing.</p> <p>The PNP is reliant upon its assumption that alignment in new homes and jobs is key determinant in the phasing of growth, yet in doing so it fails to recognise that such an approach can in fact be counter-productive if it fails to deliver new homes in a timely manner, as this may deter economic investment in the area.</p>	<p>As above.</p> <p>In accordance with all requirements, the document set has evidenced in detail that it is in general conformity with the strategic policies of the adopted Local Plan and all other 'basic condition' requirements – no change is appropriate.</p> <p>As above.</p> <p>As above.</p> <p>As above.</p>

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		<p>In addition, the PNP is silent on matters relating to housing land supply and affordability. The overriding emphasis appears to be on reflecting environmental constraints thereby limiting the opportunity for development. However, such an approach fails to recognise that the three dimensions of sustainable development as defined in the NPPF are mutually dependent. This casts further doubts as to whether the PNP satisfies the Basic Condition to contribute positively to the achievement of sustainable development as set out in the Town and Country Planning Act 1990 (as amended) (Paragraph 8(2)(d)).</p> <p>The adopted Local Plan places significant weight in Neighbourhood Plans within Torbay, as the delivery mechanism for its growth agenda. Such an approach is therefore dependent on the Neighbourhood Plans adopting a positive, flexible approach to ensure sustainable development can be delivered.</p> <p>It is clear, however, that this is not the case with the currently drafted Paignton Neighbourhood Plan. As such, our client suggests that significant amendments are made to ensure that the Plan:</p> <ul style="list-style-type: none"> <li>• Aligns with the adopted Local Plan;</li> <li>• Adopted a timely and expeditious approach to the timing and phasing of housing sites within the Future Growth Areas;</li> <li>• Recognises that there is a need to provide housing in advance of additional job creation to encourage the right conditions for economic growth;</li> <li>• Acknowledges that housing delivery in the early stages of the Neighbourhood Plan will help to address affordability issues; and</li> <li>• Does not rely on any future Local Plan Review as a potential means of de-allocating adopted Local Plan sites.</li> </ul> <p>We therefore look forward to reviewing the revised version of the Paignton Neighbourhood Plan, which we hope will reflect a more positive and flexible approach to plan making than the current draft.</p>	<p>As above.</p> <p>As above.</p> <p>As above.</p> <p>All of these matters have been taken fully into account as evidence in the Basic Conditions Statement and Supporting Evidence documents in particular – no change is appropriate.</p>

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ID	Name	Submission received	Response summary
B008	Origin 3, on behalf of Taylor Wimpey Homes (Exeter)	<p>These representations are submitted to Paignton Neighbourhood Forum on behalf of Taylor Wimpey Homes (Exeter) in respect of its site at land north of Totnes Road, Collaton St Mary. Please refer to the enclosed Site Location Plan.</p>  <p>As you'll be aware from our meeting in July 2016, Taylor Wimpey intend to submit a planning application for the development of circa 99 dwellings this year. This follows the adoption of the Torbay Local Plan in December 2015 where the site is included within the Totnes Road/ Collaton St Mary (SDP3.3) Future Growth Area to accommodate a total of 460 dwellings over the plan period (2012-2030) and the subsequent adoption of the Collaton St Mary Masterplan SPD in February 2016 which provides greater guidance on an appropriate distribution strategy for growth within Collaton St Mary.</p>	<p>It is understood the link with the site referred to continues to be one of an option to purchase.</p> <p>As discussed at the meeting referred to there are significant infrastructure and protected habitat requirements which the Local Plan clearly identifies must first be met before any development of the land can be approved.</p>

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		<p>Land north of Totnes Road, Collaton St Mary also contributes towards Torbay Council being able to demonstrate a five-year supply of deliverable housing sites. The Council expects Taylor Wimpey's site (referred to in Torbay's latest housing trajectory (2015/16) as "Taylor Wimpey Site (car boot)") to deliver 80 dwellings within the five-year period 2018/19 – 2020/21. In order for this to materialise, factoring in the planning application process and lead-in times, a planning application will need to be submitted this year.</p> <p>With this in mind, we have set out below our comments to the Neighbourhood Forum relating to the draft Neighbourhood Plan (Regulation 14). Our comments relate to the following key matters:</p> <ul style="list-style-type: none"> <li>• The Neighbourhood Plan's approach to housing delivery; and</li> <li>• The proposed Local Green Space (LGS) designation at Little Blagdon Sunday Car Boot Field, Totnes Road (PLGS60).</li> </ul> <p>Please find overleaf (below) our response to the Neighbourhood Forum's consultation questions.</p> <p>1) Do you support the draft plan proposed?</p> <p><u>Policy PNP1 – Area Wide Policy</u></p> <p>Draft Neighbourhood Plan Policy PNP1 sets out that "<u>priority will be given to securing job led growth</u>" (p17) [underlined for emphasis], part of which will involve ensuring a balanced provision of new development at all times through "regular (annual) reviews".</p> <p>The strategic approach to housing delivery was scrutinised at length during the Torbay Local Plan Examination, prior to the Local Plan being adopted in December 2015. Whilst we would all agree an ideal scenario would be to have a coordinated and direct link between job creation and house building, realistically it is not possible to get such a clear and direct link. The main concern raised by the Local Plan Inspector in his report dated 12th October 2015 was that a job-led approach in an</p>	<p>As above.</p> <p>The first bullet item (list left) is substantially the same as Submission B009 above and the same response applies.</p> <p>The second bullet point is addressed below.</p> <p>See response to B009 which applies equally here.</p>

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		<p>area like Torbay where economic performance has been poor in recent years would not work. There is a danger that firms would be reluctant to move to the area or expand in the area if they fear that housing to support job creation will not be provided in a timely fashion.</p> <p>Consequently, he set out in his final report that <i>“it is unrealistic to rely on a jobs led approach in an area where the local economy has been struggling and there is a clear need to strongly encourage local employers to expand or new employers to move to the area...the danger of housing growth not being matched by jobs growth is outweighed by the advantage of support for the Council’s growth strategy and the confidence the strategy may bring to those looking at the area for investment opportunities.”</i> (p9).</p> <p>Thus, the adopted Local Plan Policy SS12 (Housing) sets out that provision will be made for 8,900 homes over the plan period or beyond, so long as these can be provided without harm to the economy or environment, including sites protected under European Legislation.</p> <p>In light of the above, the Neighbourhood Plan should look to boost housing in years 6-10 to ensure that housing delivery is on track to provide at least 8,900 dwellings. As set out above, it is expected that a boost in housing delivery would provide a catalyst for job creation. By reverting back to a job-led growth strategy the Neighbourhood Plan would not be in general conformity with the principles of the adopted Local Plan and would be at risk of being found unsound in the context of the National Planning Policy Framework (NPPF) paragraph 184.</p> <p><u>Table 8.1 - Housing sites phasing conclusions</u></p> <p>The adopted Local Plan (paragraph 4.5.49) makes clear that the role of the Neighbourhood Plan is to allocate land to assist meeting housing needs after the first five years – i.e. expected requirements from April 2017. The Neighbourhood Forum’s role is therefore not to re-open the debate on the required housing figure but to conform with the policies of the adopted Local Plan and positively support them. Neighbourhood plans should not promote less development than set out in the Local Plan nor undermine the Local Plan’s strategic polices (NPPF paragraph 184).</p>	<p>As above.</p> <p>As above.</p> <p>As above.</p> <p>As above.</p>

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		<p>If the Neighbourhood Plan does not positively address housing delivery in line with the strategic policies of the Local Plan the Council will produce a Site Allocations DPD to allocate land to meet housing needs later in the plan period (Local Plan paragraph 4.5.51, p94). This process was due to commence by the 31st March 2016 in light of the Neighbourhood Plans not coming forward by this date (Local Plan paragraph 4.1.29). We understand that Torbay Council are allowing the Neighbourhood Plans to continue (in effect granting extended time) however this puts added pressure on the Neighbourhood Plan to come forward in a timely manner.</p> <p>The Neighbourhood Plan is therefore required to allocate sites for the delivery of housing in years 6-10 (2017/18-2022) in accordance with the Torbay Council five-year supply trajectory and for a rolling five year period until the end of the plan (2030) to ensure that the Council does not have to produce a Site Allocations DPD. In our experience the production of such a document is rarely a quick process and would put the Council at risk of not being able to demonstrate a rolling five-year supply.</p> <p>Given the above, the Neighbourhood Plan needs to clearly allocate sufficient sites for Years 6-10 of the plan period. Years 6-10 of the plan period are in effect Years 0-5 now and therefore represent immediate need. At present, the draft Neighbourhood Plan's trajectory does not clearly set out a housing supply specifically for this period (2017/18 – 2021/22) in line with the Local Plan which requires the delivery of 1,190 dwellings (Local Plan Policy SS12).</p> <p>The Local Plan (Policy SS12) requires the provision of at least 4,285 dwellings at Paignton over the plan period (2012-2030). For Paignton alone, the minimum requirement set out in the housing trajectory (Local Plan Table 4) is as follows:</p> <ul style="list-style-type: none"> <li>• Years 1-5 (2012/13 – 2016/17) – 960 dwellings</li> <li>• Years 6-10 (2017/18 – 2021/22) - 1,190 dwellings</li> <li>• Years 11-15 (2022/23 – 2026/27) – 1,330 dwellings</li> <li>• Years 16-18 (2027/28 – 2029/30) – 800 dwellings [<u>underline for emphasis</u>].</li> </ul> <p>Our concerns at present relate to the Neighbourhood Plan's focus on deterring development at certain sites (including Taylor Wimpey's site) until after the anticipated Local Plan five-year reviews</p>	<p>As above.</p> <p>As above.</p> <p>As above.</p> <p>As above.</p> <p>As above.</p>

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		<p>have taken place in 2020/21 and 2025/26 rather than seeking to boost housing delivery and maintain a five-year supply trajectory which includes Taylor Wimpey’s site at land north of Totnes Road. Particular reference is made to Table 8.1 (Housing sites and phasing conclusions) of the draft Neighbourhood Plan (p94) where it is stated development at Taylor Wimpey’s site (referred to as “FGA SS2 Area E” in Table 8.1) is only suitable to come forward after the second Local Plan Major Review in 2025/26 and as such is at the back end of the Neighbourhood Plan’s housing trajectory for delivery in Years 2027/2030. Furthermore, the Neighbourhood Plan’s trajectory accounts for only 40 dwellings at the site compared with Torbay Council’s trajectory which expects the site to deliver circa 100 dwellings (80 within the next five years (2018/19 – 2020/21)).</p> <p>Reference is made to the adopted Collaton St Mary Masterplan SPD which supplements the Torbay Local Plan. In relation to Taylor Wimpey’s site at land north of Totnes Road (referred to as “Phase 4” in the Masterplan), the Masterplan SPD states the following:</p> <p><i>“The areas highlighted in this phase are not necessarily most suited for delivery towards the end of the life of the masterplan. Instead, they are standalone projects that can be delivered earlier without negatively impacting upon the other phases should the need or desire to develop these areas sooner arise”.</i></p> <p>The adopted Masterplan SPD expects the delivery of 105-110 dwellings at Phase 4 which comprises Taylor Wimpey’s Site and a smaller site to the north of the village centre.</p> <p>Adopted Local Plan Policy SS13 (Five year housing land supply) states that where Neighbourhood Plans do not identify sufficient sites to meet Local Plan requirements in years 6-10 of the housing trajectory (see above), the Council will either:</p> <ol style="list-style-type: none"> <li>1. <i>“Bring forward additional housing land from later stages of the Plan, working closely with land owners, developers and Neighbourhood Forums; or</i></li> <li>2. <i>Identify additional sites through new allocation development plan documents; or</i></li> </ol>	<p>As above.</p> <p>As above.</p> <p>As above.</p> <p>As above.</p>

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		<p><i>3. Consider favourably applications for new housing, consistent with Policy SS2, H1 and other Policies of this Plan.”</i></p> <p>The housing trajectory detailed in the adopted Local Plan should not be viewed as a target but as a minimum requirement. Policy SS13 goes on to say that new housing leading to the five-year supply figure being exceeded will be permitted where:</p> <ul style="list-style-type: none"> <li>i. <i>“The proposal would bring social, regeneration or employment benefits, including through the provision of funding of infrastructure;</i></li> <li>ii. <i>The proposal would not lead to serious infrastructure shortfalls; and</i></li> <li>iii. <i>The proposal is consistent with other Policies in the Local Plan.”</i></li> </ul> <p><u><i>Proposed Local Green Space (LGS) designation - PLGS60</i></u></p> <p>In total the Neighbourhood Forum seeks to designate sixty-two areas of Local Green Space (LGS) in the draft Neighbourhood Plan, including the ‘Little Blagdon Sunday Car Boot Field’ (PLGS60) adjacent to Taylor Wimpey’s site.</p> <p>By designating land as LGS local communities will be able to rule out new development other than in very special circumstance (NPPF paragraph 76). Thus, the Government makes clear that</p> <p><i>“Identifying Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.”</i> (NPPF paragraph 76, p18).</p> <p>The effect of a site’s designation as LGS is very significant. It is therefore essential that the designation is applied properly and for its intended purpose.</p> <p>With reference to the adopted Torbay Local Plan Policies Map (Sheet 23), the entirety of the</p>	<p>As above.</p> <p>The boundary of PLGS.60 has taken fully into account the Collaton St. Mary Masterplan SPD, the previous appeal proposals withdrawn and all subsequent discussions. Appendix 5 of the Supporting Evidence document that accompanies the Neighbourhood Plan sets out comprehensively how the site meets the criteria required of LGS designations. No change is appropriate.</p> <p>As above.</p>

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		<p>proposed LGS site PLGS60 lies within the Council's identified Future Growth Area (Local Plan Policy SS2) which sets the strategic growth direction for development in Collaton St Mary. Whilst development at land proposed as PLGS60 (the site adjacent to Taylor Wimpey's site) is not expected to come forward within this plan period (with reference to the Collaton St Mary Masterplan), in the context of the NPPF paragraph 76 the Neighbourhood Plan's proposed LGS designation at this location is clearly not consistent with the Council's local planning strategy for sustainable development as the land is earmarked as a Future Growth Area.</p> <p>Furthermore, the land covered by proposed LGS designation PLGS60 is privately owned land that is not accessible to the public. There is some level of discretion as to what spaces would be regarded as suitable for LGS designation however the common denominator is that the general public benefit from access to the site. NPPG paragraph: 013 (Reference ID: 37-013-20140306) provides examples of the type of location LGS designation would be appropriate, this reads as follows:</p> <p><i>"...green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis."</i></p> <p>As such, in addition to the proposed designation not conforming to the strategic vision of the adopted Local Plan we do not consider the proposed designation site PLGS60 to be a suitable location for LGS designation on its merits in the context of the above national guidance.</p> <p>In any event, it should be noted that the proposed LGS designation PLGS60 has not been worked up in accordance with the Taylor Wimpey's development proposals for the adjacent site. At the very least, this should be addressed if the Neighbourhood Forum do opt to progress with proposed LGS designation.</p> <p>2) <u>Are there any changes you wish to see made to the plan?</u></p> <p>In our view based on the above comments, the Neighbourhood Plan does not currently conform to the Local Plan strategic policies particularly in relation to the phasing of housing delivery and in relation to the proposed LGS designation PLGS60.</p>	<p>As above.</p> <p>As above.</p> <p>As above.</p> <p>See response to B009 above which applies equally here.</p>

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		<p>Torbay Council is now somewhat reliant on the Neighbourhood Plan coming forward in a timely manner in order to ensure it can sustain a rolling five-year land supply. Thus, making it even more important that the Neighbourhood Plan is considered to be in compliance with the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990.</p> <p>In order to ensure the Neighbourhood Plan meets the basic conditions we suggest the following changes are made:</p> <ul style="list-style-type: none"> <li>• The Neighbourhood Plan should look to complement the strategic vision of the Local Plan by encouraging a boost to housing supply in Years 6-10. As set out by the Local Plan Inspector, a housing-led approach would likely encourage more investment in job creation.</li> <li>• The Neighbourhood Plan should not discourage development at the identified Local Plan Future Growth Areas in the earlier part of the plan period. The adopted Collaton St Mary Masterplan SPD makes clear that providing properly supported infrastructure is put in place, particularly drainage and flood prevention measures, it would be acceptable for development to come forward sooner.</li> <li>• The proposed LGS designation at PLGS60 should be removed as it is not consistent with Policy SS2 (Future Growth Areas) in the adopted Local Plan (refer to Policies Map Sheet 23).</li> </ul>	<p>As above.</p> <p>As above.</p> <p>As above.</p> <p>As above.</p>
B010	Stride Treglowan Town Planning, on behalf of Deely Freed/ Abacus	<p>We have been engaged by DF/AP since 2008/09, providing town planning and masterplanning design services in respect of their land holdings in the Torbay area.</p> <p>Since 2014, we have represented DF/AP in respect of their land holding to the south of land locally referred to as White Rock. During this time we took an active role in the examination of the <i>Torbay Local Plan 2012 to 2030</i> (the Local Plan). During the Local Plan examination, the Council recommended that our client's landholding south of White Rock (the Site) be allocated for development under a Main Modification.</p>	<p>The Submission received is essentially the same as Submission B009 above.</p> <p>The site lies just outside of the Neighbourhood Plan boundary. However, development of the land referred to in the Submission would constitute a formal "Departure"</p>

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		<p>The proposed allocation was aligned with the identification of surrounding land within a Future Growth Area and in order to support the Council’s need to identify capacity to accommodate long term housing needs. The Inspector concluded that the site has merit in meeting strategic housing needs and the agreed that it can be delivered in a comprehensive manner. However, at the time of the Examination Hearings (which are now some two and a half years ago), there was insufficient ecology and landscape survey data/assessment so as to be able to confirm an allocation and it therefore did not proceed to the final adopted Local Plan.</p> <p><b>1. Recent Work</b></p> <p>Since the Inspector’s report on the soundness of the Local Plan we have been actively engaged in preparing baseline assessment work to underpin decisions on how to bring forward development proposals to meet long term housing needs. This has been predicated on the basis of what, in our view, are clear indications from the Inspector that the Site has potential to be considered for allocation / a grant of planning permission, subject to satisfying concerns relating to ecology and landscape impacts.</p> <p>In support of this strategy, Torbay Council have adopted (16th February 2017) an Environmental Impact Assessment (EIA) Scoping Opinion for the Site, confirming the scope of any future EIA and Environmental Statement. This opinion clarifies, amongst other matters, the scope of Landscape and Visual Impact Assessment work (including key viewpoints to be assessed) and the scope of survey, and likely mitigation required, in respect of ecology.</p> <p>We have also been engaged in early pre-application discussions with Officers of Torbay Council, South Hams District Council and the office of the South Hams Area of Outstanding Natural Beauty (AONB).</p> <p>Most recently, we have undertaken public consultation on emerging proposals. This was launched on 11th May 2017 with two key stakeholder sessions and a public event together with a further public event on 13th May 2017. A website which hosts the consultation material together with a link to a feedback survey was launched on 11th May 2017. The consultation period closed at 23:59 on</p>	<p>from the adopted Local Plan which applies other policies to the site and conflicts with the Appeal decision by the Secretary of State in 1997.</p> <p>As above.</p> <p>As above.</p> <p>As above.</p> <p>As above.</p>

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		<p>26th May 2017.</p> <p><b>2. Neighbourhood Planning Policy</b></p> <p>The basic premise of Neighbourhood Planning is summarised in Planning Practice Guidance (PPG) which notes that:</p> <p><i>Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built...Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community <b>where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.</b></i> (our emphasis) (ref. 001 41-001-20140306)</p> <p>PPG continues, noting that “a neighbourhood plan should support the strategic development needs set out in the Local Plan and plan positively to support local development (as outlined in paragraph 16 of the National Planning Policy Framework). (ref. 004 41-004-20140303). Paragraph 16 of the NPPF confirms that this relates to policies for housing and economic development and further that neighbourhoods should, “plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan”.</p> <p>Specific policy in relation to neighbourhood planning is set out in paragraphs 183-185 of NPPF. In particular, paragraph 184 states that:</p> <p><i>The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan... Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders <b>should not promote less development than set out in the Local Plan or undermine its strategic policies.</b></i> (our emphasis)</p>	<p>As above.</p> <p>As above.</p> <p>As above.</p>

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		<p>This context is important in all neighbourhood plan areas, but particularly so in Torbay due to the unique situation where the proposed neighbourhood plans for Torquay, Brixham and Paignton cover the entire area of the local planning authority.</p> <p><i>Local Policy Context</i></p> <p>The strategy set out in the adopted Torbay Local Plan (December 2015) places great emphasis on the role of the three proposed neighbourhood plans in the detailed delivery of the Local Plan's policies. This role is encapsulated in both the strategic policies in section 4 of the Local Plan and the delivery area policies in section 5 (in relation to Paignton, section 5.3 specifically.) These policies establish clear expectations for how each neighbourhood plan will meet needs within its respective Forum area, including those relating to the supply of land for housing and employment.</p> <p>The following policies are directly relevant to the proposed PNP:</p> <ul style="list-style-type: none"> <li>• SS1 – <i>"In years 6-10 of the Plan (2017/18-2021/22), development will come from completion of committed sites and developable sites identified in Neighbourhood Plans."</i> <ul style="list-style-type: none"> <li>4.1.29 – <i>"...neighbourhood plans...only need to identify sufficient sites to maintain a rolling five year housing supply from 2017"</i></li> </ul> </li> <li>• SS2 – <i>"Major development outside of [Future Growth Areas] will only be permitted where the site has been identified by the relevant Neighbourhood Plan..."</i></li> <li>• SS4 – <i>"The Local Plan supports the creation of at least 5,000-5,500 net additional jobs by 2030."</i> <ul style="list-style-type: none"> <li>4.2.18 – <i>"detailed mechanisms for delivering employment-led development, including the quantum, layout and phasing, will be determined through a combination of neighbourhood planning, masterplanning, and supplementary planning documents."</i></li> </ul> </li> <li>• SS5 - "Specific sites will be identified through Neighbourhood Plans... The Council, in</li> </ul>	<p>As above.</p> <p>As above.</p> <p>As above.</p>

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		<p>conjunction with Torbay Development Agency and Neighbourhood Planning Forums, will use Local Enterprise Areas and Local Development Orders to encourage provision of high quality employment space, environmental improvements, and better facilities serving employment within existing and proposed employment areas, so long as this is consistent with other Policies in this Plan”.</p> <ul style="list-style-type: none"> <li>SS13 (Table 4 – Local Plan phasing and housing trajectory):</li> </ul> <table border="1" data-bbox="504 643 1599 863"> <thead> <tr> <th>Plan Years</th> <th>Financial Years</th> <th>Paignton</th> </tr> </thead> <tbody> <tr> <td>1 – 5</td> <td>2012/13 – 2016/17</td> <td>960</td> </tr> <tr> <td>6 – 10</td> <td>2017/18 – 2021/22</td> <td>1,190</td> </tr> <tr> <td>11 – 15</td> <td>2022/23 – 2026/27</td> <td>1,330</td> </tr> <tr> <td>16 – 18</td> <td>2027/28 – 2029/30</td> <td>800</td> </tr> <tr> <td colspan="2" style="text-align: right;"><b>Total</b></td> <td><b>4,280</b></td> </tr> </tbody> </table> <p>5.1.2 – <i>“Emerging Neighbourhood Plans are already identifying sites and projects for future development. One of the roles of Neighbourhood Plans is to identify sites for employment and new homes to come forward over the medium to long term... Neighbourhood Plans will add detail to the way in which these sites might come forward.”</i></p> <ul style="list-style-type: none"> <li>SDP1 – Source of Employment and Housing Land</li> </ul> <p>(Extract of Table 11)</p>	Plan Years	Financial Years	Paignton	1 – 5	2012/13 – 2016/17	960	6 – 10	2017/18 – 2021/22	1,190	11 – 15	2022/23 – 2026/27	1,330	16 – 18	2027/28 – 2029/30	800	<b>Total</b>		<b>4,280</b>	<p>As above.</p>
Plan Years	Financial Years	Paignton																			
1 – 5	2012/13 – 2016/17	960																			
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		Policy/Site Name	Commitments (mainly years 1-5 and 6-10 of Plan)	Deliverable urban/Neighbourhood Plan sites (mainly years 6-10 of Plan)	
		SDP3 Paignton North and Western Area	White Rock – 8.8ha (36,800 sq m)  Claylands – 6.8ha (27,000 sq m)	Yalberton (Jackson Land) 3.7ha (14,800 sq m)  Devonshire Park (former Nortel Site) 1ha (4,000 sq m)	
		(Extract of Table 12)			

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		Estimated delivery period (years)	1-5	6-10	11-15	16-18	
		Policy/Site Name	Commitments and other deliverable sites	Commitments (continued delivery), Neighbourhood Plan sites and Future Growth Area			Total
		SDP2 Paignton Town Centre and seafront	68	165	43	314	590
		SDP3 Paignton North and Western Area	433	1,022	500	294	2,249
		SHLAA sites elsewhere within SDP1	358	150		142	650
		Windfalls	121	260	260	156	797
		Total Paignton	980	1,597	803	906	4,286
		<u>Local Plan Examination</u>					
		The adopted Local Plan has already been subjected to independent scrutiny through the Examination process, which provides important context for the rationale behind the strategy and policies in the Local Plan and how these operate together to meet the test of soundness. In this respect, we feel that two aspects of the Inspector's findings in particular must be borne in mind.					As above.

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		<p>Firstly, he noted that there was a likelihood that jobs growth would not begin until <i>after</i> 2016 (paragraph 22, Inspector’s Report on the Torbay Local Plan). Whilst this is clearly a challenge for the local economy, the Inspector endorsed the Council’s proposed tandem strategy of linking housing and jobs delivery, specifically noting that:</p> <p><i>“with a plan based on a strong growth agenda it would be illogical to have a strategy that did not support increases in both housing and employment. Critically, in an area like Torbay where economic performance has been poor in recent years, there is a danger that firms would be reluctant to move to the area or expand in the area if they fear that housing to support job creation will not be provided in a timely fashion”</i> (para 26 Inspector’s Report on the Torbay Local Plan).</p> <p>The second point relates specifically to the role of PNP and others. Whilst not repeating in full those matters discussed during the Examination Hearing sessions, it is important to recognise that the Inspector had specific concerns about the overall strategic approach to delivery, insofar as it relates to Neighbourhood Planning.</p> <p>Whilst paragraph 28 of the Inspector’s Report notes that the principle of leaving medium term planning, and in particular allocation/identification of sites, to the Neighbourhood Plans is a sound one, which accords with Government commitments to the function of Neighbourhood Planning, this was with caveats, including:</p> <p><i>“[To ensure that the Plan is in accordance] with paragraph 184 of the NPPF, the Plan must contain a clear strategic framework for the NP to work within”;</i></p> <p><i>“In the case of Torbay this will need to quantify the scale and timing of the development needed to fulfill the Council’s housing growth ambitions”, and,</i></p> <p><i>“the Plan needs to include a clear policy commitment that the Council will undertake the necessary development work if the neighbourhood planning process does not successfully deliver the Local Plan strategy”.</i></p>	<p>As above.</p> <p>As above.</p> <p>As above, noting also that the Council as local planning authority has not progressed a site allocation Development Plan Document (DPD) as provided for in the adopted Local Plan.</p>

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		<p>The adopted Local Plan addresses these points, albeit further development plan work has not been taken despite the fact that the March 2016 deadline for submission of the Neighbourhood Plans has been missed by each Forum.</p> <p><b>3. Representations</b></p> <p>We have reviewed the draft PNP, supporting documents and evidence base, with particular reference to the draft Basic Conditions Statement and the associated summary at Part 3 of the draft PNP itself.</p> <p>At the outset, we must note that neither the draft PNP nor the draft Basic Conditions Statement refer directly to paragraph 184 of NPPF, a policy specifically aimed at neighbourhood plan-making. Moreover, although the effect of a number of the policies in the draft PNP is ambiguous, our understanding of the overall position is that the draft PNP does in fact promote less development than set out in the local plan in direct contravention of paragraph 184.</p> <p>Our view is, therefore, that the draft PNP is fundamentally flawed and could not be made in its current form. It is also so fundamentally flawed that the defects are not capable of rectification by modifications that would be within the power of an Examiner to recommend. It needs to be completely redrafted. We say this for the reasons set out below.</p> <p>Paragraphs 3.11 and 3.12 of the draft PNP refer to trends in employment numbers, planning consents, housing new starts/completions and vacant homes since the Local Plan period started in 2012. Paragraph 3.13 then states that, <i>"Review of these 'signals'... is a legitimate step to take into account in preparing the Neighbourhood Plan"</i>.</p> <p>We understand that this refers to the work set out at A4.2 of the draft Basic Conditions Statement. This appears broadly to take the position previously proffered by the Paignton Neighbourhood Forum at the Examination of the Local Plan, namely that the level of need is lower than that which has been identified and therefore it should not be met. In effect, the draft PNP appears to be undertaking a review of the Local Plan strategy in this respect and adopting the Neighbourhood</p>	<p>As above.</p> <p>As above.</p> <p>As above.</p> <p>As above.</p> <p>As above.</p> <p>As above.</p>

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		<p>Forum's position that was rejected by the Inspector in the Local Plan Examination.</p> <p>It is our view that such an approach is fundamentally flawed. Whilst the PNP Forum may be in receipt of evidence on the current local circumstances, this does not negate the requirements to be in conformity with the Development Plan. As the draft PNP itself sets out in a number of places (for example at Paragraph 3.7) mechanisms for review of the Local Plan strategy are already in place elsewhere and are the responsibility of the Council.</p> <p>In respect of delivery, the PNP Forum argument appears essentially to be one which suggests that additional housing is not required within the draft PNP because the anticipated jobs growth has not occurred. The lack of jobs growth is not disputed, but it is important to recognise that the local jobs position in this century has fluctuated from a low of 55,000 in 2000 to a peak of 60,000 in 2001 and 2003. Given this long term position, the Inspector's conclusion set out above that without housing growth job creation will not materialise, must still be the correct approach.</p> <p>In this context, the implicit conclusion of the "review" that a reduction in the new start/completion rate is a signal that land supply should be reduced is clearly illogical. Moreover, it is contrary to emerging policy in the Housing White Paper which clearly points to a future position where low completion rates will lead to a requirement for higher, and not lower, land supply levels.</p> <p>Whatever the basis of the "review", it leads to the statement in paragraph 3.13 of the draft PNP that, <i>"[The Review] has led to the conclusion that the supply of land in the Local Plan together with planning consents already granted will last for longer than the Plan period to 2029/30."</i> This is simply wrong. It does not in any way reflect the status of sites listed in the Local Plan and the mechanisms set out in the Local Plan for ensuring adequate supply of land in this period, and does not give any indication of how the rolling 5 year housing land supply will be maintained by the PNP. As a result, the draft PNP inevitably promotes less development than set out in the Local Plan in contravention of paragraph 184 of NPPF.</p> <p>As set out above, the Local Plan also sets out expectations in respect of the neighbourhood plans identifying employment land to support job creation. As with housing, the draft PNP also fails to meet</p>	<p>As above.</p> <p>As above.</p> <p>As above, noting also that the "review" has not reduced the land supply.</p> <p>As above, noting also that the quotation referred to accords entirely with the references in the adopted Local Plan.</p> <p>As above.</p>

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ID	Name	Submission received	Response summary
		<p>this Torbay Local Plan strategic aim; we do not believe that the statement at A4.2.25 is borne out by the contents of the draft PNP itself. For the reasons set out by the Local Plan Inspector, no reliance can be placed on job growth in the period 2012-16 to conclude (as the draft PNP does) that the Local Plan strategy in this respect has failed. Accordingly, the draft PNP's lack of provision of employment land also constitutes promotion of less development than set out in the Local Plan in contravention of paragraph 184 of NPPF.</p> <p><b>4. Summary</b></p> <p>We are conscious that the Basic Conditions only require "general conformity" with local and national policies and that it is not a requirement that there be no tension whatsoever between the Neighbourhood Plan and other plan documents. Nevertheless, we feel that the items set out above reveal consistent and repeated failures by the draft PNP to conform with the strategic policies of the Local Plan. It is therefore so fundamentally flawed in its current form that it should not be permitted to proceed to the next stage in the neighbourhood plan-making process.</p>	<p>The Basic Conditions Statement and Supporting Evidence documents show comprehensively how the Plan complies fully – no change is appropriate.</p>
B105	Torbay Action for Art	<p>The document on art and culture was submitted some time ago by TAA who have engaged to a significant degree with local artists and groups engaged with art and culture. That group have never, to my knowledge received any feedback from the PNP.</p> <p>The submission on art and culture needs to be included in the Plan. I would like someone from the Forum to contact me to discuss please. (Representatives subsequently attended Forum meeting 15 June 2017).</p>	<p>The Plan is geographically based, not topic based. This meets community wishes throughout the preparation stages. No priority is given to any one site over another that might prove suitable for an Art Centre, though location in the town centre is potentially capable of assisting achievement of Policy PNP2.</p> <p><b>Agreed</b>, add to text of PNP2 (Town Centre) to read:  <i>“ a) improve the vibrancy, <b>cultural experience</b>, appearance</i></p>

**Appendix 11(e) – Organisations (in alphabetical order) - Not supporting the Plan for the reason where given**

ID	Name	Submission received	Response summary
			<i>and layout of the area;.....</i> . See also above at Appendix 11(b) Submission A158).
B106	Torbay Action for Art	<p>Policy PNP6 is very limited and lacks ambition. Policy PNP6 is very limited. Please see :- <a href="http://www.torbay.gov.uk/DemocraticServices/ieListDocuments.aspx?CId=163&amp;MId=4678&amp;Ver=4">http://www.torbay.gov.uk/DemocraticServices/ieListDocuments.aspx?CId=163&amp;MId=4678&amp;Ver=4</a> Torbay Art Centre Torbay Council's publication "On the crest of a wave" A Strategy for the Arts and Creative Industries in Torbay 2006-2016 page 19, states "Develop a multi-purpose centre with particular emphasis on the visual arts for permanent and temporary exhibitions " ( This ambition was also in the Councils earlier strategies ).</p> <p>To address this and other cultural questions, the Council together with the Arts Council called a meeting at the Riviera International Centre on the 17th Oct. 2012 "What could Torbay's cultural future look like? " The wish of the majority of attendees was to facilitate the Councils stated aim of an Arts Centre. To that aim a group was formed "Torbay Action for Art -TAA "and formally constituted. This group identified Parkfield House as being a highly suitable Council owned property that would meet the Councils stated objectives.</p> <p>The TAA committee had discussions with Steve Parrock, Adrian Sheen, Marissa Wakefield, Cllr Dave Butt, Cllr Darren Cowell, and have had valuable assistance from Brian Roberts of Number One Consulting . Cllr Dave Butt Executive Lead for Culture and the Arts referred to the possibility of an arts centre in his article in the Herald dated 24th April 2013. As the project develops we would look for ongoing advice and support from the above as well as those we have had informal contact with:- Carolyn Custerson English Riviera Tourism Company, Tracey Cabache Community Development Trust: Anna Gilroy Torbay Council Arts Officer, Mischa Eligoloff Cultural Partnerships Officer, et al. TAA's committee sees the Council's stated aim as admirable and of benefit to all ages and groups in Torbay and tourists alike and have submitted our suggestions to be included in the three towns Neighbourhood Plans. The added benefit of providing this cultural facility is that Torbay could earn the reputation of " Coast, Countryside and Culture", thus raising the nature and number of its visitors.</p>	As above (Submission B105).

**Appendix 11(e) – Organisations (in alphabetical order) - Not supporting the Plan for the reason where given**

ID	Name	Submission received	Response summary
		<p>It is recognised that thriving economies in the towns and cities of the UK invariably also have a thriving art scene. Bodies such as the Arts Council and the United Kingdom Arts and Design Institutions Association (Ukadia) have acknowledged this in several publications by highlighting the £60bn the creative industries contribute to the economy and demonstrate why sustaining that contribution with continued investment, will become increasingly important to economic recovery.</p> <p>The TDA have addressed aspects of the situation with their Innovation Centres, they are also giving guidance on writing a business plan (currently at draft stage) for the use of Parkfield House as Torbay's Art Centre.</p>	
B107	Torbay Action for Art CIC	<p>The art aspects of our culture are inadequate.</p> <p>Policy PNP6 Art and Culture Policy Artists have been involved in the life of Paignton for centuries. Whether its masons carving ornate stone for its buildings, painters and sculptors capturing the town, its people and coastline, musicians playing in the harbour, a performance in the theatre or simply someone photographing a view. Art enhances the quality and richness of the town and is an integral part of its cultural wellbeing.</p> <p>These policies aim to promote and support economic, environmental and social development by attracting tourists and business, by enhancing the design of the buildings and spaces and by encouraging pride in the town. The outcomes, support, material and narrative of public art can vary considerably. However, the consistent quality of public art is that it is site specific and relates to the town and the bay. It may include new buildings, architectural features and spaces, landscaping, materials, sculpture, landmarks, images, events and decoration. It may be small or large scale, permanent or temporary, internal or external.</p> <p>It is also recognised that art and culture are major contributors to education, health and social well-being. The National Planning Policy Framework (NPPF) also promotes this approach: 'take account of and support local strategies to improve health, social and cultural well-being for all, and deliver</p>	As above (Submission B105).

**Appendix 11(e) – Organisations (in alphabetical order) - Not supporting the Plan for the reason where given**

ID	Name	Submission received	Response summary
		<p>sufficient community and cultural facilities and services to meet local needs.’ (Paragraph 17) The new Torbay Local Plan (2012 – 2030) includes Aspiration 4: Create more sustainable communities and better places. One of the objectives states: ‘To create more enjoyable, creative built and natural environment using heritage assets, public art and revitalisation of the public spaces to attract events, exhibitions and festivals which celebrate and enhance the culture of Torbay.’ Also, reference is made more specifically in Policy TC1 Town Centres: ‘The use of heritage assets, public art and public space, events, exhibitions and festivals to provide more enjoyable, creative environment in town centres.’</p> <p>The following policies will help establish Paignton as a major cultural destination and inspirational place for people to live, work and visit: Arts activity Support, develop and fund opportunities for the people of Paignton to take part in and experience a wide range of arts activity and to share in the social, economic and environmental benefits the arts can bring. Support the development of an environment where artists can flourish. Dedicated places A dedicated art and cultural hub will be provided in the town. Indoor and outdoor space will be provided throughout Paignton for cultural and art projects to inspire, engage and encourage residents and visitors. Offering support, guidance and incentives Support, guide and fund local initiatives, including art markets, pop ups, art trails, performance, street theatre and visual displays. Incentives will be offered to businesses to become patrons and mentors for local artists through an ‘Art for Rent Scheme’. Space will be provided in business premises for the placement of art in order to support the gallery and artist. Heritage and Cultural Assets Promote Paignton’s heritage by encouraging the positive use of buildings and spaces, and by recognising places valued by the community.</p>	
<b>Total</b>	<b>3</b>	<b>Respondents</b>	

**Appendix 11(f) – Organisations (in alphabetical order) – No preference stated**

ID	Name	Submission received	Response summary
B101	Big Barn College and Holy Days School	<p>Fernham Village and Sands is important historic and cultural heritage as it is part of the rural area which Brunel's Great Western Railways opened for visitors and trade, thus leading Isaac Singer and his family creating their dream homes now to be restored and renamed Paris Singer Gardens, Oldway Mansions, and Palace Globe as the focal point of Peynton Rural Park Torbay, Devon, England, U.K. to be celebrated during the reign of Her Majesty Queen Elizabeth the Second and her Heirs forever in the protected 'Grass Belt' of the West Country, Great Britain. Submitted by Melvyn Paul Newbery Brunel Chartered Engineer.</p> <p>As protected by covenants, and local people for the safety and health of children, animals, farm land, Village greens, beaches, waters, Geo Park and now Rural Park designation.</p>	<p>Support shown for the Plan protecting heritage assets is welcome and noted.</p>
B003	Devon & Cornwall Police	<p>My role as the Police Designing out Crime Officer (DOCO) (formerly Police Architectural Liaison Officer – ALO) is to act as the single point of contact for the planning authority, architects and developers, in providing appropriate and relevant advice and recommendations on designing out opportunities for crime, fear of crime, antisocial and unacceptable behaviour (ASB) and conflict in the built environment. This is achieved by reviewing planning applications, as per protocol below in conjunction with the requirements of the National Planning Policy Framework (NPPF) and Local and Neighbourhood Plans to ensure the aims and objectives of this concept have been considered by the applicant.</p> <p><b><u>Police Designing out Crime Officer Protocol with Planning Authority:-</u></b></p> <ul style="list-style-type: none"> <li>• Major housing schemes of 10+ dwellings</li> <li>• Major commercial office, industrial, retail or leisure schemes</li> <li>• New neighbourhood or district community facilities</li> <li>• Relevant shop front improvements</li> <li>• Proposals which include significant areas of open space/landscaping as part of a development, including linkage footpaths</li> <li>• Proposals incorporating significant off street car parking provisions</li> <li>• Proposals involving transport interchanges or other significant highway infrastructure</li> </ul>	<p>Support shown for the Local Plan policy is welcome and noted.</p> <p><b><u>Agreed</u></b>, add new sub-heading and text at the end of PNP1-Annex 2 to read:</p> <p><b><u>“Designing out crime</u></b></p> <p><b><u>(xx) all development proposals will be expected to show how crime and the fear of crime have been taken into account in the proposals submitted for planning approval having regard to:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Access and movement - Places with well-defined and well used routes with spaces</u></b></li> </ul>

Appendix 11(f) – Organisations (in alphabetical order) – No preference stated

ID	Name	Submission received	Response summary
		<ul style="list-style-type: none"> <li>• Improvements such as cycle lanes and new or improved footpaths</li> <li>• All applications for Class A3, A4 and A5 food and drink uses</li> <li>• New or redeveloped schools/education premises</li> <li>• Where the intended occupants are particularly vulnerable and may require a higher standard of security to ensure their personal safety e.g. care homes and drug rehabilitation centres</li> <li>• Gypsy and Traveller sites</li> <li>• ATM's</li> <li>• Solar Farms</li> </ul> <p>It is pleasing that the role of the DOCO and designing out crime etc. is firmly embedded in the Torbay Plan but as Neighbourhood Plans are also referred to in the planning decision process and 'crime and the fear of crime' are material planning considerations, therefore a determining factor in planning consent, it is considered that there should be specific policy written into the PNP for new development.</p>	<p><i>and entrances that provide for convenient movement without compromising security.</i></p> <ul style="list-style-type: none"> <li>• <b><u>Structure</u></b> - Places that are structured so that different uses do not cause conflict.</li> <li>• <b><u>Surveillance</u></b> - Places where all publicly accessible spaces are overlooked.</li> <li>• <b><u>Ownership</u></b> - Places that promote a sense of ownership, respect, territorial responsibility and community.</li> <li>• <b><u>Physical protection</u></b> - Places that include necessary, well-designed security features.</li> <li>• <b><u>Activity</u></b> - Places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times.</li> <li>• <b><u>Management and maintenance</u></b> - Places that are designed with management and maintenance in mind, to discourage crime. “</li> </ul>



Appendix 11(f) – Organisations (in alphabetical order) – No preference stated

ID	Name	Submission received	Response summary
		<p><i>Safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.</i></p> <ul style="list-style-type: none"> <li>• <b>Crime and Disorder Act 1998, specifically section 17</b> which directs that we must have community safety embedded into our planning, our policy and our operational day-to-day activity. It states <i>‘Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can, to prevent, crime, fear of crime and disorder in its area’.</i></li> <li>• <b>Torbay Plan - DE1 Design &amp; SS11 Sustainability</b></li> <li>• <b>Secured by Design (SBD)</b> - <i>SBD is a crime prevention initiative owned by the Mayor’s Office for Policing and Crime (MOPAC) on behalf of the UK police services. SBD aims to reduce crime, the fear of crime and opportunities for antisocial behaviour and conflict within developments by applying the attributes of CPtED in conjunction with appropriate physical security measures.</i></li> <li>• <b>And all other relevant local planning policies relating to the</b> creation of safe, secure and sustainable communities.</li> </ul>	
B006	National Grid	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area. <u>Gas Distribution - Low / Medium Pressure</u> Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within the proposed development sites. If further information is required please contact <a href="mailto:plantprotection@nationalgrid.com">plantprotection@nationalgrid.com</a></p>	Confirmation noted – no change necessary.



**Appendix 11(f) – Organisations (in alphabetical order) – No preference stated**

ID	Name	Submission received	Response summary
		<p><i>crossing over the railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval".</i></p> <p><u>Developer Contributions</u></p> <p>The Neighbourhood Development Plan should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure.</p> <p>Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions.</p> <p>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.</p> <p>Specifically, we request that a Policy is included within the document which requires developers to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development.</p> <p>The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network.</p> <p>To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that Developer Contributions should include provisions for rail and should include the following:</p>	<p>PNP6 and PNP12 include this.</p> <p>As above.</p> <p>As above.</p>

**Appendix 11(f) – Organisations (in alphabetical order) – No preference stated**

ID	Name	Submission received	Response summary
		<ul style="list-style-type: none"> <li>▪ A requirement for development contributions to deliver improvements to the rail network where appropriate.</li> <li>▪ A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.</li> <li>▪ A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.</li> </ul> <p><u>Planning Applications</u></p> <p>We would appreciate Paignton/Torbay Councils providing Network Rail with an opportunity to comment on any future planning applications should they be submitted for sites adjoining the railway, or within close proximity to the railway as we may have more specific comments to make (further to those above).</p>	<p>A requirement for the Council to undertake in accord with the legislation referred to in the Submission received.</p>
B001	South West Water	<p>I refer to the above (NP) documents the content of which is noted and upon which South West Water has no specific comments at this time.</p>	<p>Response noted, see also response of Environment Agency below (Appendix 11(f) Submission C001).</p>
B014	Transition Town Totnes Cycling Group, Totnes Neighbourhood Plan Transport	<p><b>Introduction</b></p> <p>The Forum has been able briefly to review the Paignton Neighbourhood Plan (PNP), paying particular attention to the transport provisions for the Western Corridor.</p> <p>We have noted the substantial housing growth planned for the areas around Great Parks and Collaton St Mary. We would like to express our concern at the likely growth in motor traffic which these developments would occasion and believe that the impact may be unsustainable but certainly requires mitigation. We have expressed this concern before.</p>	<p>Concern noted and which the Local Plan and Collaton St. Mary Masterplan SPD make clear would need to be addressed before</p>

**Appendix 11(f) – Organisations (in alphabetical order) – No preference stated**

ID	Name	Submission received	Response summary
	Task Group.	<p>The Forum wishes our two communities to work together on this issue in as many ways as are open to us. Mitigating the congestion ( noted in the PNP as already a problem) would minimise the economic damage to both our communities; minimising increases in pollution caused by motor traffic would help to protect our health.</p> <p><b>Comments on Particular Sections:</b></p> <p><b>p 43 Getting Around</b></p> <p>Should additional housing be approved around Great Parks and Collaton St Mary the (Totnes) Forum welcomes this section as a whole, and in particular the following:</p> <p>Objectives:</p> <p><b>In the short term:</b></p> <ul style="list-style-type: none"> <li>• Promoting transport connectivity</li> <li>• Improved signage for visitors</li> <li>• Improved surface connection for visitors with disabilities</li> <li>• Review the way traffic uses the Town Centre and how it interacts with pedestrians</li> <li>• Small scales changes that collectively improve pedestrian connection</li> <li>• De-clutter the town centre and make it easier to move around on foot</li> <li>• Ensure that parking within the town supports the viability of the Town Centre</li> <li>• Plan public transport better to meet user’s needs</li> </ul> <p>Policy PNP 12 <b>Integrated transport</b> in the town centre and seafront area .....is encouraged. For development to proceed, financial contributions will be required.....to fund, in full, necessary active travel, public transport and highway infrastructure.</p> <p>Community priorities in terms of additional local facilities. The (Totnes) Forum welcomes all community facilities a) to j) ...and also</p> <p>“Proposals that prevent a) to j) from being achieved will not be approved”</p>	<p>approval could be given to planning applications. Working together is welcomed.</p> <p>Support noted.</p> <p>Support noted.</p>

**Appendix 11(f) – Organisations (in alphabetical order) – No preference stated**

ID	Name	Submission received	Response summary
		<p><b>p 57 Western Corridor King’s Ash Road/Brixham Road and (PNP22)</b></p> <p>The (Totnes) Forum welcomes this section as a whole, and in particular the following:-</p> <p>6.118 The major bottleneck ....is at Tweenaway Cross. Unsatisfactory provision exists in the area for safe, enjoyable active travel....</p> <p>Objectives:</p> <ul style="list-style-type: none"> <li>• Further development should only take place if there are developer contributions that meet the road improvement costs [and S106 contributions for the mitigation of impact along the A385 including Totnes]</li> <li>• Provide safe, continuous cycling and pedestrian pathways that link to key locations...and strategic longer links across open countryside to Totnes.....</li> </ul> <p>Policy PNP 22 Active travel in the Western Corridor area is encouraged.</p> <p>Financial contributions will be required ...from each developer to fund in full necessary active Travel, public transport and highway infrastructure.</p> <p>Community priorities in terms of additional local facilities.....</p> <p>The (Totnes) Forum welcomes all community facilities a), b), c), d), e), f) and also</p> <p><b>Proposals that prevent a) to f) from being achieved will not be approved.</b></p>	<p>Support noted.</p> <p>Support noted.</p> <p>Support noted.</p>
<b>Total</b>	<b>8</b>	<b>Respondents</b>	

## Appendix 11(g) – Statutory Bodies (in alphabetical order) - All

ID	Name	Submission received	Response summary
C004	Brixham Peninsular Neighbourhood Forum	<p>The Brixham Peninsula Neighbourhood Plan forum working group has considered in detail your draft Paignton Neighbourhood Plan. We support your plan and commend those involved for the extremely high level of supporting information and the clear and logical way things are presented. We note your plan proposes to repeat for information purposes Torbay Council's identification of Local Plan sites. This is a similar approach to that followed by the Brixham Peninsula Neighbourhood Plan at regulation 14 consultation stage in relation to Employment sites. As your plan's approach is relevant to the approach we take in our own plan we would request being kept appraised of the situation should this change.</p>	Support noted. Any change made will be notified as requested.
C001	Environment Agency.	<p>In our previous consultation letter dated the 10th May 2016 we were pleased to note that the main aims and objectives of the plan referenced the improvement of the towns flood and sea defenses together with the protection of green space and ecological features.</p> <p>We requested that the plan considers policy which would contribute towards the enhancement of the water environment in general, with particular reference to designated bathing waters. Our aim was to ensure that surface water from new development would be kept out of the combined sewer system.</p> <p>Paragraph 6.51 of the draft plan references the findings of South West Water's 2014 Sewer Capacity Assessment. The assessment identifies the necessity to reduce the surface water load from the combined sewers.</p> <p>The SWW assessment provides the evidence to support the approach set out in Annex 3 to Policy PNP1. Whilst the policy doesn't explicitly mention the potential for the protection of bathing water quality by not overloading the combined sewer system it ensures the actions required to protect the current standard of bathing water quality will be implemented as and when development proposals come forward.</p>	<p>Support noted –also see amendment above in Appendix 11(b) Submission B002.</p> <p>Support noted.</p> <p>Support noted.</p> <p>Support noted – no change necessary.</p>
C005	Historic England	<p>Thank you for your Regulation 14 consultation on the Paignton Neighbourhood Plan.</p> <p>In fact there are few comments that we wish to make. We note that no sites are allocated for</p>	Support noted.

## Appendix 11(g) – Statutory Bodies (in alphabetical order) - All

ID	Name	Submission received	Response summary
		<p>development. We are impressed by the extent to which the Plan identifies and draws upon the area’s distinctive local identity to inform policies and proposals intended to address locally relevant issues. The scope and nature of these is extensive and comprehensive and demonstrates a holistic understanding of how the Plan area could be improved to generate social, economic and environmental wellbeing.</p> <p>We are particularly pleased that the area’s historic character and suite of heritage assets are identified as important defining qualities which it is desirable to protect and enhance, represented in such forms as the Picture House (policy PNP5) and specific proposals for the Old Town (policy PNP11).</p> <p>We therefore only need to congratulate your community on its Plan and wish it well in pursuing the remainder of the plan making process.</p>	<p>Support noted.</p> <p>Support noted - no change necessary.</p>
C006	Natural England	<p>We are pleased to see that the richness of the local environment is highlighted and valued in the Plan. The local environment’s importance for rare and protected species, such as greater horseshoe bats and Cirl Buntings is an asset to Paignton and this comes across in the Plan.</p> <p>As noted in the Plan, a large area in the west and south is covered by the greater horseshoe bat (GHB) sustenance zones and strategic flyways as defined in the South Hams Special Area of Conservation (SAC) GHB consultation zone planning guidance.</p> <p>Natural England would recommend that you include reference to all designated sites within your local area; this includes Saltern Cove Site of Special Scientific Interest (SSSI), Roundham Head SSSI and the adjacent Lime Bay and Torbay Marine Special Area of Conservation (SAC). Preferably these sites and those of local importance (i.e. Local Nature Reserves) would also be clearly identified on an OS map. See MAGIC for authoritative geographic information about the natural environment from across government.</p> <p><b>Policy PNP1– Area Wide Policy</b> We are pleased to see that biodiversity enhancement is mentioned in this key overarching policy but</p>	<p>Support noted.</p> <p>Support noted.</p> <p><b>Agreed</b>, insert a plan and schedule into the main Plan document that identifies on an O.S. base all sites referred (left).</p> <p><b>Agreed</b>, add to text of PNP1 to</p>

Appendix 11(g) – Statutory Bodies (in alphabetical order) - All

ID	Name	Submission received	Response summary
		<p>feel that it could be strengthened to apply to all aspects of the policy rather than only in reference to jobs and local identity.</p> <p>We note that the policy seeks to safeguard key areas of rural landscape, local green spaces and food production and we suggest that this could re-worded to specifically promote biodiversity enhancement as all of these assets contribute to community wellbeing and the tourism offer. We note that specific named areas for Local Green Space and key areas of rural landscape are identified on plans. It appears that areas for local food production (i.e. allotments) are mapped as Local Green Space.</p> <p><u>Annex 1 to PNP1</u> This draws strongly on the benefits of growing food locally in terms of encouraging healthy lifestyles and community cohesion. We are pleased to see that the plan seeks to build upon the existing biodiversity and landscape assets by encouraging coherent ecological networks.</p> <p>We are pleased see measures aiming to reduce the impacts of the construction and operation of new developments are outlined in the plan. Resource efficiency and the continual reduction in CO2 emissions are vital in efforts to protect the natural environment and to avert the worst impacts of climate change.</p> <p>We support the requirement for new developments to achieve drainage improvements that will divert</p>	<p>read:</p> <p>In first paragraph:</p> <p><i>“In all parts of the Paignton Neighbourhood Plan Area a balanced delivery of <b>growth and biodiversity enhancement</b> will be supported by:.....”.</i></p> <p>In first paragraph under sub-heading of “More homes:” add text to read:</p> <p><i>“Housing growth appropriate to meet local needs <b>and biodiversity enhancement</b>, including affordable housing, will be supported through.....”.</i></p> <p>Support noted.</p> <p>Support noted.</p> <p>Support noted. – see also C001</p>

## Appendix 11(g) – Statutory Bodies (in alphabetical order) - All

ID	Name	Submission received	Response summary
		<p>surface water away from the combined sewer network and improve water quality which will in turn benefit biodiversity.</p> <p><u>Green Infrastructure and Priority Habitats</u> It is encouraging to see the emphasis placed on the protection, enhancement and linking of green spaces (including the greening of streets) to enhance the local green infrastructure network that runs through many of the plan's policies. The plan area contains numerous areas of Priority Habitats (see MAGIC), including traditional orchards, ancient woodland, broadleaved woodland and semi-improved grassland. It would be good to ensure that these are linked through multifunctional green infrastructure, where opportunities arise. Information on Priority Habitats can be found in the UK Biodiversity Action Plan (UK BAP) - <a href="#">click here for more information</a>. While we welcome the inclusion of the Torbay GI Delivery Plan map (page 23), the quality is poor and difficult to read.</p> <p><b>Housing</b> We note that the Plan states that no additional sites are allocated for development. Clarification on this matter is sought and the degree to which the Neighbourhood plan is compatible with the Torbay Local Plan. It is our understanding that the Local Plan anticipates that sites will be allocated within the Neighbourhood plan to meet housing delivery needs. It is suggested this issue is discussed with Torbay Council.</p> <p><u>If the Neighbourhood Plan changes and sites are to be allocated, these would need to be assessed through both a Habitats Regulations Assessment and a Strategic Environmental Assessment (SEA).</u></p> <p><b>General comments</b> Where policies refer to specific areas (such as in PNP13, PNP16 &amp; PNP 21) these areas should be shown on an OS base map rather than by an indicative circle. This will ensure that decision makers are clear about the area to which the Neighbourhood Plan's policies relate and enable the policies to be implemented effectively.</p>	<p>above from Environment Agency.</p> <p>Support noted.</p> <p><b>Agreed</b>, attempt will be made to include a better quality of the GI map or reference link to it.</p> <p>Addressed in detail in Appendix 4 of the Basic Conditions Statement that accompanies the Neighbourhood Plan.</p> <p><b>Agreed</b>, include an OS based map showing the boundaries and elements referred to (left).</p>
C103	Stoke Gabriel	The Plan is comprehensively researched, communicated, well presented and has gone through all	Support noted.

## Appendix 11(g) – Statutory Bodies (in alphabetical order) - All

ID	Name	Submission received	Response summary
	Neighbourhood Plan Group	necessary consultations. Writing on behalf of the Stoke Gabriel Neighbourhood Plan Group liaison has been excellent. We particularly support the proposals for protected area designation for the Yalberton Valley to Blagdon Valley. The lower part of the Yalberton Valley includes the Mill Pool at Stoke Gabriel and River Dart and lies within the South Hams area and has been designated at national level as an Area of Outstanding Natural Beauty (AONB). It is likely that this area will become at least 'local green space' in The Stoke Gabriel Plan, providing a green corridor from Blagdon to the Dart. We also support particularly proposals relating to White Rock.	
C102	Stoke Gabriel Parish Plan Group	PNP12 Getting around - a stated aim for increased connectivity both within the NP area and to/from adjacent areas should be included.	This is already covered to the extent considered necessary by Policy PNP22.
C002	Torbay Council as Local Planning Authority	<p>Thank you for preparing the pre-submission Consultation Draft of the Paignton Neighbourhood Plan and suite of supporting documents. These clearly represent a great deal of time, effort and dedication by the Neighbourhood Forum.</p> <p>As has been set out a number of times previously, Torbay Council has a number of overarching concerns. The Draft Neighbourhood Plan does not make site allocations and is therefore not in general conformity with the Adopted Torbay Local Plan (2012-2030). In addition, the Neighbourhood Plan appears to seek to re-assess Torbay's objectively assessed need, with a view to reducing housing numbers or postponing development on some sites until after the Local Plan review in 2020. In the Council's view this is likely to be tantamount to promoting less development than required by the Local Plan, contrary to paragraph 184 of the NPPF.</p> <p>Notwithstanding these concerns, the Neighbourhood Plan is clearly written and concise. I have included a detailed table of comments at appendix 1, which builds on David Pickhaver's comments sent by email on 16<sup>th</sup> March 2017 relating to Draft Version 14-2 of the Plan. Key points that I would alert the Forum to are;</p> <ul style="list-style-type: none"> <li>• That the Plan would be significantly more legible if accompanied by a Policies Map;</li> </ul>	<p>Both of the concerns have been addressed comprehensively in the document set produced. The Council's conclusion on general conformity is based on an assertion that does not fit with the facts and legal requirements involved.</p> <p>Part 7 of the Plan is intended to function as the "Policies Map". <b>Agreed</b>, enhancement will be</p>

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		<ul style="list-style-type: none"> <li>• Some policies, particularly some Local Green Spaces conflict with development aspirations;</li> <li>• The restriction of occupation of town centre dwellings in PNP13 (c) will impact on viability and the delivery of town centre regeneration;</li> <li>• As a general point, the phrasing “Proposals that prevent...will not be approved” may be better phrased in the positive i.e. “proposals that achieve...will be approved.”</li> </ul> <p>The Torbay Development Agency (TDA) will be submitting comments on behalf of Torbay as a landowner and development agency. This letter is on behalf of Torbay in its role as local planning authority. Other Council departments may wish to provide additional comments.</p> <p>However, I would highlight that a need has been identified for two primary school sites in Paignton, although the site currently being considered for one of these schools is within the Brixham Peninsula Neighbourhood Plan area.</p> <p><b>Objectively Assessed Need</b></p> <p>The Neighbourhood Forum was extensively involved in the Torbay Local Plan Examination. It is fair</p>	<p>included in the final Plan to assist with the concern raised. See below where the specific sites are referred to.</p> <p>The prospect of securing “viability” is enhanced by alerting developers to local requirements in advance.</p> <p>The Plan’s policies all commence with positive phrasing. Where any negative words are used (as with the NPPF and Local Plan), they help developers to know what the material considerations will be in any departure that may arise. Without such clarity, wasted developer effort and resources result.</p> <p>Clarification noted and welcome in view of the findings later below (see TDA submission C003).</p> <p>This has come too late and with very little information. Inevitably it is a matter now for future planning applications to address.</p> <p>Comprehensively addressed in the</p>

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		<p>to say that the Forum was a principal advocate of lower, or more phased, growth than promoted in the Local Plan. You presented extensive evidence to the Inquiry, as is of course your right to do. In considering the evidence, the Inspector assessed that Torbay’s full objectively assessed need was around 11,000 - 11,500 dwellings between 2012-30 (Inspectors Examination Report October 2015, paragraph 34); and that the policy-on requirement was 8,900 dwellings ( Inspector’s Report, paragraph 41). Whilst the Inspector expressed some doubt about the Council’s Economic Strategy; he rejected an approach that restricted homes until jobs had been delivered (paragraph 27).</p> <p>The Draft Neighbourhood Plan acknowledges the Local Plan requirements for homes and employment space (p10-11); but the following text in paragraphs 3.10 et seq. suggests a skepticism on the part of the Forum about the level of housing need in Torbay. This is expanded upon in Appendix 4 (pages 23-29) of the Basic Conditions Statement and section 2 (pages 6-19) of the Supporting Evidence document. Whilst the housing trajectory at Table A4.2.12 of the Basic Conditions Statement sets out a housing trajectory, it seems to postpone the delivery of some sites for reasons un-related to infrastructure. These include sites already allocated in the Local Plan under Policy SS2.</p> <p>It is appreciated that the Forum’s view is honestly held. However, we would respectfully point out that the Neighbourhood Plan is not a re-run of the debate about overall housing requirements that took place through the Local Plan. This was the subject of a full consultation process and a resolution provided by the Inspector’s Report dated October 2015. There is a requirement for Neighbourhood Plans to support the strategic development needs set out in the Local Plan and to plan positively to support local development (NPPF 16, 184 and Planning Practice Guidance (PPG) 41-004-20140306).</p> <p>The Local Plan Inspector’s findings are relatively recent. However, the subsequent 2014 based DCLG Household Projections (published in 2016) indicate a slight increase from the 2012 based projections (to 8,200 additional households over the Plan period). Moreover, the recent Housing White Paper “<a href="#">Fixing our broken housing market</a>” clearly seeks to build more homes and sees Neighbourhood Plans as a mechanism for increasing housing supply (paragraph 1.41-4). The purpose of this paragraph is not to re-open the debate about the Local Plan’s housing requirement,</p>	<p>Basic Conditions Statement and Supporting Evidence documents.</p> <p>As above.</p> <p>The review has been unavoidable because annual monitoring reports have not been produced by the Council as required by the Local Plan and its ‘plan, monitor and manage’ approach (LP paragraph 7.5.10).</p> <p>The slight increase is an estimate and still shows negligible growth even though additional homes have been approved and built.</p> <p>As evidenced in the document set,</p>

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		<p>but to set out that it is too early to assume that a review will reduce numbers in the face of a clear Government intention to increase housing supply. Moreover, the Council would not support a phasing of housing sites if this is not related to the provision of Infrastructure (which is the basis for the assessed phasing in the “SD” policies in the Local Plan). Such a rationing of sites is unlikely to accord with the Local Plan’s growth strategy, or the presumption in favour of sustainable development.</p> <p><b>Site Allocations</b></p> <p>The above concerns lead to a related point that the Neighbourhood Plan is not making site allocations. The Local Plan relies on neighbourhood plans for the allocation of housing and employment sites shown in Appendix C of the Local Plan. This is set out in Policies SS1 and SS13 of the Local Plan for housing, and Policies SS4 and SS5 for employment. I acknowledge that the word “identify” in Policies SS1 and SS13 would have been better drafted as “propose/allocate”. However the context of the Policies is clear that the Council looks to neighbourhood plans to provide certainty on sites for years 6-10 of the Local plan (i.e. 2017-22). This context is also provided by Policies SDP1, SDP2 and SDP3 of the Local Plan.</p> <p>The Local Plan Inspector clearly expected that Neighbourhood Plans would contribute towards Torbay’s housing supply and noted that if Neighbourhood Plans are not put in place then the five year supply position will be uncertain (paragraph 47, 49 and 56 of the <u>Inspector’s report</u>). The Inspector indicates that the disadvantages of not having a five year supply should not be underestimated. Because the Neighbourhood Plan does not make site allocations, I am afraid that I must reiterate the objection that it is not in general conformity with the strategic policies of the Local Plan, and promotes less development than the Local Plan, contrary to Paragraph 184 of the NPPF.</p> <p>The Neighbourhood Plan does show the “identified sites” from the Local Plan Appendix C in part 7 and Appendix 2 of the Supporting Evidence. However this is unlikely to be sufficient to meet the Local Plan requirements or provide sufficient certainty that these sites are deliverable within the definition of footnote 11 of the NPPF. In the Council’s view, this could be remedied relatively easily by making these sites clear proposals and identifying them on a policies map. The Council has</p>	<p>the phasing takes consideration of infrastructure referred to. The conclusions are not rationing-led as implied.</p> <p>As above.</p> <p>As above.</p> <p>As above.</p> <p>Also noting that Natural England’s response (Submission C006 above) takes a materially different</p>

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		<p>carried out HRA screening of these sites and is satisfied that mitigation measures can be put in place to avoid them requiring Appropriate Assessment (please see Appendix 2). Should the Forum need to identify additional or alternative sites, the Council has offered to assist with the additional HRA/SA work that would be required. This may be necessary, as I note that some of the Local Plan Appendix C sites are designated as Local Green Spaces in the Draft Neighbourhood Plan (e.g. PLGS 20 Oldway Mansion Gardens and PLGS 05 Queens Park).</p> <p>If the Forum chooses to maintain its current position, then the Independent Examiner will need to consider whether a lack of site allocations renders the Neighbourhood Plan incapable of being made. If the Examiner does agree with the Forum that the Neighbourhood Plan cannot be required to allocate sites, this is likely to leave Torbay without a five year housing land supply. The Forum will be aware that the Supreme Court has now provided a definitive view on the impact of a lack of five year land supply (Suffolk CDC vs Hopkins Homes [2017] UKSC37). In addition I would point out that the protection provided by the Written Ministerial Statement of 12<sup>th</sup> December 2016 will not apply if the Neighbourhood Plan does not allocate sites for housing.</p> <p>In paragraph 49 of the Examination Inspector's Report, the Council confirmed its intention to prepare site allocation documents if Neighbourhood Plans did not allocate sufficient sites. In addition, Policy SS13 of the Local Plan considers a range of measures that the Council will need to adopt in order to maintain a 5 year housing supply.</p> <p><b>Policies Map</b></p> <p>Whilst the Neighbourhood Plan is generally a well set out and legible document, its legibility is significantly constrained by the lack of a policies map. This point relates in part the Council's wish to see site proposals. However it also relates to the wider usability of the Plan, which currently requires one to read through the entire document to ascertain what policies are relevant to a specific site. The Neighbourhood Plan is for use by the general public and as a development management tool. The Plan should assist applicants, case officers etc, and where sites are particularly complex, there is a risk that key policies may be overlooked.</p>	<p>view to the Council regarding the HRA position and 'certainty' sought.</p> <p>Full account has been taken of the LGS designated sites referred to.</p> <p>It is agreed the decision of the Supreme Court (10 May 2017) is relevant, which confirmed that if there were not to be a 5-year supply, it does not make other policies and considerations obsolete.</p> <p>It is important to note that the Council has not implemented the DPD undertaking given nor offered any explanation as to why.</p> <p>Enhancement to Part 7 will be made as previously referred to. The issue behind the comment is understood as it applies equally to the adopted Local Plan.</p>

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		<p>Accordingly, the Council strongly urges the Forum to produce a policies map to be included in the Plan. The Council continues to offer assistance with the additional mapping work at a fixed price of £1,000, which is a discounted rate representing the cost price.</p> <p><b>Detailed Comments on Policies</b>            I have set out detailed comments on the Neighbourhood Plan policies in Appendix 1 to this letter. They are confined to the upper case Policies, although the issues noted above also apply. I recognise that the Government has given significant latitude to neighbourhood forums in setting neighbourhood plan policies (e.g. set out in PPG 41-001-21040306). Accordingly, the bulk of these comments are intended as advice rather than as objections. I have sought to make it clear where the Council objects to the Plan in the main text of this letter above.</p> <p>As I have acknowledged, the Neighbourhood Plan is well written, which reflects the huge effort that the Forum has put into the document. Whilst the Council must object that the Neighbourhood Plan cannot be made (adopted) in its current form, the issues are in my view capable of resolution.</p> <p>There are a number of aspects which I feel would benefit from further discussion. With this in mind, I would like to offer the opportunity of a workshop style event with a couple of Forum Members and members of my team. We have carried out a workshop with Torquay and Brixham Peninsula Neighbourhood Forum members which we thought, and I believe they did too, was helpful to both parties. It helps us to understand why certain policies are included and what the intention of the policy is, and if necessary we can have an open discussion about how it might be improved upon.</p> <p>Once the consultation responses to the Neighbourhood Plan have been considered, and the plan amended where appropriate to take account of those comments, as a Forum you may also find it useful to undertake a 'Health Check' service which is available through the Neighbourhood Planning Independent Examiner Referral Service (NPIERS). Further details are available from NPIERS (<a href="mailto:npiers@rics.org">npiers@rics.org</a>). In our view using an independent examiner to undertake a Health Check before submitting a plan will give you an insight as to whether the draft plan meets the basic conditions and</p>	<p><b>Agreed</b>, further discussion on the offer will be taken forward with the final details submitted.</p> <p>Clarification noted together with the position taken by the Council since the Forums were designated (Council Minute Appendix 2 Basic Conditions Statement).</p> <p>Extensive discussion over many meetings has confirmed why the Council's objection remains not valid.            The meeting took place on 30 June 2017 and did not resolve the fundamental issues involved.</p> <p>As made clear to the Council in writing, the problem will be that such 'health-checks' always carry the caveat that they are not able to be a substitute for the Assessment itself, and the principle objection from the Council is that the Plan</p>

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		<p>can give you the confidence to proceed.</p> <p>I look forward to working with you to continue advancing the Paignton Neighbourhood Plan.</p>	<p>does not allocate sites. It must now be for the Assessor to consider this aspect of the Plan so that developers are not left in a vacuum about this part of the development plan any longer than is justified.</p>
<b>Appendix 1 Detailed Comments on Paignton Neighbourhood Plan Policies</b>			
		<b>Policy</b>	<b>Comment</b>
		General phrasing	As a general point, the Council would suggest that policies should be worded positively i.e. "permission will be granted where...." Since this is more in accordance with the Presumption in favour of sustainable development.
		PNP1 More Jobs	Support the positive emphasis of this policy. Under Point C the employment sites should be allocated.
		PNP1 More Homes	Note the overarching comment above. The Council would prefer a reference to a housing target retained at point (e). Under Point (e) Housing sites should be allocated.
		PNP1 Point F: HMOs	Support the intention and wording of point (f). As a point of information, the Article 4 Direction on Class C4 HMOs has not been implemented and would not in any event affect large HMOs (which need planning permission).
		PNP1 (h) and (i)	<p>It is noted with thanks that the wording of point (f) has been amended in line with earlier suggestions,</p> <p>Keeping jobs, homes and retail in balance is supported; but it may not be practical to review accurately on an annual basis, particularly as NOMIS figures are several years behind the present. Annual Survey of Hours and Earnings data may not be particularly accurate at a small area level.</p> <p>As noted above, the policy should not be used to ration housing delivery for reasons other than infrastructure constraints.</p>
			See responses given above.
			See responses given above.
			See responses given above.
			Noted, thus increasing the need for, or importance of, the Policy.
			See responses given above.

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		Annex 1 to PNP1	<p>Local Green Spaces, Rural Character Areas and the proposals for Local Food are substantive issues and consideration should be given to whether they would be better placed in their own policies rather than an annex to PNP1.</p> <p>The designation of <b>Rural Character Areas</b> is a sensible way of providing a level of protection less than LGS to wider rural character areas. This Policy should be considered in the Light of Local Plan Policy C1 and development considered suitable to the 'Countryside area'. Reference to the Torbay Landscape Character Assessment would be helpful.</p> <p>The Rural Character Areas policy should not impose a level of protection akin to a "green belt" and the comment above about positive phrasing of policies is relevant.</p> <p><b>Local Green Spaces</b> (LGS) have a weight akin to green belts (NPPF 78) and should therefore be used sparingly. LGS should not be applied to land that has development potential.</p> <p>The Torbay Development Agency will comment specifically on LGS that impact on Council landholdings. Oldway Mansion's designation as a LGS conflicts with proposals for the site.</p>	<p>As the Plan is geographically based in accordance with the Local Plan strategy, they sit better together as mutually inter-related matters.</p> <p>Supported noted.</p> <p>Reference to the Landscape Character Assessment is already shown in Table 6.2.</p> <p>The Policy is fully compliant with NPPF109.</p> <p>Appendix 5 of the Supporting Evidence document defines how the sites have been identified and are in accord with requirements.</p> <p>The sites identified by the TDA would all conflict with the policies of the adopted Local Plan. It is noted they have not been discussed individually with the Council as local planning authority. The Council has made clear to the community its wish not to progress development at Oldway following the collapse of the previous</p>

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		Annex 2	<p>There is a slight difference in protection afforded to LGS in this Policy verses other Policies e.g. PNP9 Victoria Park point (a).</p> <p>With these caveats, the policy wording for LGS is sensible.</p> <p>The intention of the additional text on <b>local food</b> production and agriculture in is supported. It is noted that the wording has been re-phrased to relate largely to matters that require planning permission.</p> <p>Point (a) Little Blagdon Farm appears to conflict with the adopted masterplan for Collaton St Mary. You will also need to ensure that the additional allotments proposed in c) are deliverable.</p> <p>Whilst the intention behind point (d) is noted, it is likely to encounter legal difficulties. It may also militate against the aspiration in the NPPF and Housing White Paper to expedite development.</p> <p>The issues covered in this Annex are substantial and may be better placed as separate policies rather than an Annex.</p> <p><b>Design:</b> The intentions of this section are supported. They need to be proportionate to the scale of the proposal.</p>	<p>approach adopted.</p> <p>PNP9 is the result of a petition from more than 5,500 residents at an early plan making stage which the Plan correctly reflects.</p> <p>Support noted.</p> <p>Support noted.</p> <p>The Masterplan SPD does not have the weight of the statutory development plan as implied. c) is deliverable by S106 in due course where necessary.</p> <p>It is a positive proposal that enables interim use to be made of unused land which accords fully with the general thrust of national policy. This compares with the alternative of disuse and potential eyesore of no benefit.</p> <p>This would detract substantially from the integrated approach of the plan.</p> <p>Support noted.</p>

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		Annex 3	<p><b>Biodiversity and Treescape</b> Seeking net biodiversity gains is supported. The Forum should consider the viability impacts of the required residential facilities, but this is intended as a general observation and not an objection to this policy.</p> <p><b>Residential facilities (including low carbon section).</b> The intention of these criteria is supported. Again, a general comment, the Forum should consider the impact on development viability.</p> <p><b>Criteria (O)</b> Homezone design is in principle supported, but where possible applications should make provision for sufficient off street parking (Local Plan Policy TA3 refers).</p> <p>The emphasis on sustainable drainage is supported. Given the importance of the issue of surface water, consideration should be given to whether it should be a dedicated policy rather than an annex.</p>	<p>Support noted. See also Natural England Submission above (C006).</p> <p>Liveability has been the principle consideration.</p> <p>Both are mutually compatible policies.</p> <p>The use of the Annex structure helps with the integrated overarching approach of the Plan.</p>
		PNP2	Support the positive tone of the policy. Reference to improving permeability between the Garden Town, seafront and Old Town is supported.	Support noted.
		PNP2-11	The inclusion of design led policies for town centre locations is supported. It is recommended that you liaise with the TDA/Council to ensure that these help deliver Policy SDP2 and town centre masterplan.	The 'twin-tracking' approach will be continued as suggested.
		PNP4 (i)	<p>The Council is likely to support funding of some urban realm proposals through CIL, should s106 prove to be an inadequate funding mechanism. The Regulation 123 list would need amending to include specific items. The Forum may also consider including some urban realm items to spend the Neighbourhood Portion of CIL on.</p> <p>No objection to the long term aspiration to relocate the Vue cinema from the Esplanade. Consideration should be given to whether the location should be to a town centre location.</p>	Support noted.
				As the Policy states, it is a long term matter.

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		PNP5 and PNP6	Particularly support the intention to bring the Paignton Picture House back into use, improve links to the seafront and make more of Torbay Road's potential.	Support noted.
		PNP7 Victoria Square	<p>Whilst the intentions of this policy are supported, it should not prejudice more comprehensive redevelopment schemes should proposals arise for redevelopment.</p> <p>Policy PNP7 (b). The Council would prefer this to refer to a proper review of parking, rather than requiring equivalent replacement of parking. Both Victoria Square and Crossways car parks are under-utilised and provide a poor visitor experience. A reduced size car park which provides a more pleasant environment may well meet the objectives of PNP7.</p>	<p>The policy emanates from community views strongly held throughout the Plan preparation which must also be factored in to a Neighbourhood Plan in a different way to a Local Plan.</p>
		PNP8 Crossways	<p>Whilst the intention of this policy is supported, it should not prejudice more comprehensive redevelopment schemes of these sites should proposals arise for redevelopment.</p> <p>Consideration should be given to making the policy more flexible to allow for a range of potential regeneration options for Crossways. For example, criteria (a) could relax the retention of primary and secondary frontages if this achieved a more successful redevelopment. Criteria (c) could seek to retain the pedestrian link <i>where possible</i>.</p>	<p>Support noted.</p> <p>PNP8 b) provides for a range of mixed use as suggested.</p> <p>Potential loss of the pedestrian link goes directly against community views and would not be acceptable.</p>
		PNP9 Victoria Park	Noted. See general comments about LGSs above.	No change appropriate as previously indicated above.
		PNP11 Old Town	<p>Policy is supported. In particular the improvement of accessibility and permeability through sustainable modes of travel is supported.</p> <p>The list of financial contributions at (a)-(f) will need to be sought in accordance with the CIL Regulations Test of Lawfulness.</p> <p>The use of contributions to help fund urban realm improvements is supported.</p>	<p>Support noted.</p> <p>Support noted.</p>

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		PNP10 Queens Park	<p>The note above about providing flexibility between S106/CIL/Neighbourhood Portion is relevant here, subject to the need to avoid “double dipping” of s106 and CIL.</p> <p>Noted. It is no surprise that the Forum do not wish to promote this site for development (PNPH17), but you will need to show how housing can be provided in general conformity with the Local Plan (see main comments).</p>	<p>See also Historic England support Submission above (C005).</p> <p>See Appendix 4 of Basic Conditions Statement and Supporting Evidence documents and Plan Table 8.1.</p>
		PNP12 Getting Around	<p>Support policy. This encourages permeability between the seafront, Garden Suburb and Old Town and is fully supported.</p>	<p>Support noted.</p>
		PNP13 Housing Opportunities	<p>Thank you for reinserting “separated” in criteria (d) (rather than “autonomous”). Fully support the provision of housing opportunities in the town centre.</p> <p>It may be an issue for the development industry, rather than the Council, to comment on in detail, but point (c) restriction of first occupation to local residents or employees may not be supported at Examination, for example if it goes beyond the scope of the NPPF. It may be more appropriate to require a proportion of homes to be provided as starter homes to people living in the area for 5 years or with other strong local connections. It is appreciated that the St Ives High Court Ruling is relevant. However it is not clear whether an equal justification exists in Paignton. In any event, criteria (c) will impact on the viability of town centre development.</p> <p>There is also a potential anomaly of imposing more stringent occupancy conditions on town centre housing than elsewhere, given that town centres are generally sustainable locations for housing.</p> <p>The inclusion of criteria (d) on flood risk is fully supported.</p>	<p>Support noted.</p> <p>See response above regarding the reference to viability.</p> <p>The alternative suggested would still entail requiring a prior residency term.</p> <p>The point is recognised, though experience shows that high quality schemes can displace local need unable to afford the new build.</p> <p>Support noted.</p>
		PNP14 Core	<p>Support thrust of Policy PNP14. The Council considers that the policy strikes a</p>	<p>Support noted.</p>

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		Tourism Investment area	<p>fair balance between allowing flexibility in the use of accommodation, whilst safeguarding the holiday character of the area.</p> <p>I note that Criteria (b) has been amended to incorporate a “reasonable prospects test”, which is supported.</p> <p>The boundaries of the Neighbourhood Plan CTIA are wider than for the Local Plan and encompass some of the areas formerly designated as Principal Holiday Accommodation Areas (PHAAs) in the former Torbay Local Plan 1995-2011.</p> <p>To avoid confusion Policy TO2 of the Local Plan, I would recommend that the area is renamed, for example to Paignton Seafront Holiday Area or similar.</p> <p>However, I consider that the policy is in general conformity with Policies TO1 and TO2 of the Local Plan.</p>	<p>There is no need to make the change suggested as the Plan boundary will take precedent over this part of TO2.</p>
		PNP15 Flood and Sea Defences	Support	Support noted.
		PNP16 Victoria Street	Support	Support noted.
		PNP17 Transport Gateway improvement	Support	Support noted.
		PNP18 Supporting Independent Traders	<p>This policy would be better titled “ <u>Supporting the Vitality and Viability of the Town Centre</u>”. Whether traders are local or not is unlikely to be a material planning consideration, and the policy wording refers (correctly) to retail use rather than the user.</p>	<p>The policy emanates from community views strongly held throughout the Plan preparation which must also be factored into a Neighbourhood Plan in a different</p>

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		<p>PNP19 Safeguarding open countryside</p> <p>PNP20 Great Parks</p> <p>PNP21 White Rock and nearby areas.</p> <p>PNP22 Western Corridor</p> <p>PNP23 Yalberton</p>	<p>The intention of this policy is supported, however the policy may need to be clarified to specify what the Forum view as primary and secondary facilities, possibly in the explanatory text. I consider you probably mean Primary: A1 Shops; Secondary: A2, A3 and compatible D1 and D2 uses (etc).</p> <p>Consideration should be given to allowing as wide a range of uses as possible to enable the town centre to remain viable and vital in the face of the threats facing town centres.</p> <p>Support in principle. See comments on PNP1 Annex 1. The policy will need to be consistent with Local Plan Policy C1, and provide a level of protection proportionate the landscape character or other strategic considerations such as maintaining green wedges etc.</p> <p>Support</p> <p>Support in principle. Employment may also come from smaller employers as well as major organisations. This policy should be read in the context of the comment that the Local Plan Inspector rejected a rigid phasing of new homes to follow increases in jobs numbers.</p> <p>The encouragement of active travel is fully supported. The Policy Explanation should recognise that the Western Corridor is also a key highway network.</p> <p>The replacement of “autonomous” with “separate” cycle paths is supported.</p> <p>No objection, subject to this not encroaching on Future Growth Areas in Local</p>	<p>way to a Local Plan.</p> <p><b><u>Agreed</u></b>, add into Appendix 1 Glossary of Terms to read: <b><u>“Primary and Secondary retail areas – means A1 (Use classes Order) shops predominate in the former and class A2, A3 and compatible D1 and D2 uses in the latter.”</u></b></p> <p>As above.</p> <p>Fully compatible.</p> <p>Support noted.</p> <p>No incompatibility found.</p> <p>Support noted.</p> <p>For key road role, see para 6.117 and Fig. 1.2.</p> <p>No conflict found.</p>

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ID	Name	Submission received				Response summary	
		to Blagdon Valley	Plan Policy SS2/SDP3.			<p><b>Agreed</b>, better map to be provided (see also Appendix 11 (b) Submission A144 above).</p> <p>The policy purpose is to widen the tourism offer.</p> <p><b>Agreed</b>, add text to PNP25 a) to read:  <i>“...retain and enhance the natural landscape character of the valley, <b>biodiversity</b> and water flowing through;.....”.</i></p> <p>Support noted.</p> <p>Comment noted.</p> <p>This Appendix is materially different to, and less comprehensive than, the schedule contained in the HRA Screening of the Plan previously agreed with the</p>	
		PNP24 Collaton St Mary Village	This Policy should not conflict with the realisation of Policies SS2 and SDP3 of the Local Plan, as well as the adopted Masterplan. The area would benefit from being indicated on a Policies Map.				
		PNP25 Clennon Valley	Support policy, but it should make reference to providing <u>sport and recreation</u> facilities as well as tourism facilities.				
			Criterion (a) could refer to the <u>ecological value</u> of the waterway.				
		PNP26 Clifton with Maidenway	Support				
		PNP27 Preston	The Torbay Development Agency, acting on behalf of Torbay Council’s assets will provide detailed comments on Oldway Mansion, and are likely to raise objections to point (b). The range of facilities in points (c) and (d) are supported, but may require some form of additional funding.				
<b>Appendix 2 Paignton Housing Sites Habitats Regulation Assessment</b>							
		Site	Category	European Site affected	Outcome of the screening	Mitigation / avoidance measures	Is AA required ?

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ID	Name	Submission received					Response summary	
		PNPH1- PNPH6	B	N/A	No negative effects	N/A	No	Council. As above
		PNPH7	C2	South Hams SAC	The site lies within the sustenance zone and a strategic flyway for GHBs and, without appropriate design and mitigation, is likely to have a significant effect on the integrity of the South Hams SAC both alone and in combination with other projects.	Greater horseshoe bat Mitigation objectives for Great Parks should be implemented as recommended by the HRA Site Appraisal Report of Torbay Local Plan Strategic Delivery Areas (Proposed Submission Plan) 2014.	No	As above.
		PNPH8 PNPH9 – PNPH22	B C2	N/A Lyme Bay and Torbay Marine SAC	No negative effects Development in flood risk areas. The level of growth could potentially have negative impacts on water quality from contaminated run-off.	N/A The Local Plan Policies W5 and ER2 restrict development that could have negative impact on the Lyme Bay and Torbay Marine SAC.	No No	As above. As above.
		PNPH23	C2	South Hams SAC	The site lies within the sustenance zone and a strategic flyway for GHBs and, without appropriate design and mitigation, is likely to have a significant effect on the integrity of the South Hams SAC both alone and in combination with other projects.	Greater horseshoe bat Mitigation objectives for Yalberton Industrial State should be implemented as recommended by the HRA Site Appraisal Report of Torbay Local Plan Strategic Delivery Areas (Proposed Submission Plan) 2014.	No	As above.
		PNPH24 and PNPH25	C2	South Hams SAC; and Lyme Bay	Development that results in loss of semi-natural vegetation and/or introduction of new light	Mitigation measures should include: provision of landscape buffers between development and areas of	No	As above.

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ID	Name	Submission received					Response summary	
				and Torbay Marine SAC	sources in Clennon Valley should be subject to HRA.  Development in flood risk areas. The level of growth could potentially have negative impacts on water quality from contaminated run-off.	semi-natural vegetation in the valley; control of light spill; mitigation for the loss of potential foraging and commuting habitat to ensure retention of connectivity along the valley; retention, where appropriate, of features through development that are likely to be used by GHBs; and developer contributions towards the provision of bespoke purpose-built roosts in appropriate locations along the valley.  The Local Plan Policies W5 and ER2 restrict development that could have negative impact on the Lyme Bay and Torbay Marine SAC.		As above.
		PNPH26		South Hams SAC	Brownfield site lies within the GHBs sustenance zone. Without appropriate design and mitigation, it is likely to have a significant effect on the integrity of the South Hams SAC both alone and in combination with other projects.	GHBs survey would be required to inform the HRA process.	No	

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ID	Name	Submission received					Response summary	
		<b>Paignton Employment Sites</b>					As above.	
		Site	Category	European Site affected	Outcome of the screening	Mitigation measures	Is AA required ?	As above.
		PNPE1 – PNPE5	C2	Lyme Bay and Torbay Marine SAC	Development in flood risk areas. The level of growth could potentially have negative impacts on water quality from contaminated run-off.	The Local Plan Policies W5 and ER2 restrict development that could have negative impact on the Lyme Bay and Torbay Marine SAC.	No	As above.
		PNPE6	C2	South Hams SAC	Development of Yalberton Industrial Estate is likely to cause increased disturbance and/or severance of the linear features through the estate, or of the wooded margins, would therefore be a 'likely significant effect' (LSE) that would require HRA. Detailed GHB surveys will therefore be required to inform the HRA process.	Greater horseshoe bat Mitigation objectives for Yalberton Industrial State should be implemented as recommended by the HRA Site Appraisal Report of Torbay Local Plan Strategic Delivery Areas (Proposed Submission Plan) 2014.	No	As above.
		PNPE7	C2	South Hams SAC	Development of Claylands is likely to cause loss of some semi-natural woody vegetation and is also likely to increase levels of disturbance e.g. through increased level of light. Development may also represent a future barrier to GHBs commuting in and out of the Clennon Valley in an east-west direction (and vice	Retention of the wooded margins and control of light spill from new development will be required to mitigate for likely effects GHBs. The amount of semi-natural habitat to be retained should be informed by detailed bat surveys – that should also establish whether a local flyway should be retained through	No	As above.

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ID	Name	Submission received					Response summary	
		PNPE8	C2	South Hams SAC	Development of White Rock employment site is likely to cause loss of some potential foraging habitat within the SAC <i>Sustenance Zone</i> and also loss or disturbance to hedgerows likely to be used by locally commuting GHBs. A detailed GHB survey will be required to inform the HRA process.	By following a similar approach of sites that have granted approval in this area, it should be possible to provide adequate mitigation for new development. This should be informed by full detailed bat surveys (consistent with NE SAC guidance) and should address adverse effects arising from loss of roosts, foraging habitat and likely local flyways and commuting routes. The provision of such measures should be designed to be consistent with the four principles set out in the Local Plan Policy NC1.	No	As above.
C003	Torbay Development Agency, for Torbay Council	<p>Please find attached the TDA's response as agent for Torbay Council in relation to the Draft Neighbourhood Plan, specifically Housing and Local Green Space Designations.</p> <p><b><u>Housing</u></b></p> <p>Due to the acute level of housing need (over 1,800 households on the waiting list for affordable housing) and to ensure that Torbay is a sustainable place to live and work TDA on behalf of Torbay Council would have to raise objections to the lack of residential schemes that have been proposed in</p>					Full details of the NP sites review are shown in the Basic Conditions Statement and Supporting	

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ID	Name	Submission received	Response summary
		<p>the Neighbourhood plan. It is unclear how the Paignton SDP1 – NP total figure of 3,080 homes was arrived at or that the strategy would deliver the Local Plan Policy number of 4,290 homes in Paignton.</p> <p>Furthermore Table A4.2.13 which shows the possible housing sites PNP1 and PNP2 as phase 3 and for delivery post 2027, we would object to the delivery timeframe for both these sites, both are unencumbered and from a delivery timeframe we believe they should both be in years 0 – 5. Likewise with site FGA2.2 we would object to the delivery timeframe of 2027 and would also like to see this in years 0 – 5.</p> <p>PNP13 Part C – <i>‘To help ensure the additional homes meet local needs and remain occupied throughout the year, formal agreement will be required on the grant of planning permission that restricts first occupation to purchasers or tenants who have lived in Torbay for more than 5 years, work in Torbay, or can demonstrate a confirmed offer of employment within Torbay’</i>. Whilst it is encouraging to see the support for town centre regeneration there is some concern with regards to Policy PNP13 part C. By creating an occupation restriction this could have an impact on housing supply and build which would result in insufficient supply of the right size and type of housing and so the Council would have to object to this policy and the limitations that this sets.</p> <p>Local Food 6.41 – <i>‘1 publically owned 43 acre farm and farmhouse at Little Blagdon, Collaton St Mary’</i>. The Council would wish to object to the proposals for Little Blagdon Farm. Within the Collaton St Mary Masterplan the Little Blagdon site is shown as vehicular access for the wider residential development. To use this site as the alternative use suggested could cause substantial issues with regards to the wider scheme.</p>	<p>Evidence document, which includes how the total figure of 3,080 has been arrived at – no change is necessary.</p> <p>PNPH1 and PNP2 are not “unencumbered”. Both are subject to resolving known SSSI and protected habitat needs. Similarly with site FGA2.2, as confirmed by the Council’s Masterplan for the Collaton St. Mary area. Plus period 0-5 has already passed. No change is appropriate.</p> <p>Giving clearly stated priority to meeting local need in the Town Centre will aid ensuring the right size and type of housing is provided that meets local needs – no change is appropriate.</p> <p>The alternative use is realistically achievable, at the very least until such time as the land (and derelict farmhouse) are approved for other use – no change is appropriate.</p>

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ID	Name	Submission received				Response summary	
		<p><b>Local Green Space Designation</b> The attached form (below) sets out the TDA's response for each of the sites identified as Local Green Space in public ownership.</p>				<p><b>Important:</b> The submission (left) uses wrong site reference numbers (which are shown correctly where necessary in the response below):</p>	
		<b>Ref No.</b>	<b>Location</b>	<b>Size</b>	<b>Ownership</b>	<b>TDA Comments</b>	
		PLGS.01	Paignton Green North, Central and South	Abt 5 ha	Public	No objection to Local Green Space (LGS) designation	Support noted.
		PLGS.02	Victoria Park, Torquay Road	Abt 7 ha	Public	No objection to LGS designation	Support noted.
		PLGS.03	Torbay Park and Gardens, Esplanade Road	< 1 ha	Public	No objection to LGS designation	Support noted.
		PLGS.05	Palace Avenue Gardens	< 1 ha	Public	No objection to LGS designation	(PLGS.06) Support noted.
		PLGS.06	Burma Star Garden, Cliff Road	< 1 ha	Public	No objection to LGS designation	(PLGS.07) Support noted.
		PLGS.07	Roundham Head Park, East of Roundham Ave.	Abt 3 ha	Public	Objection to part of LGS designation. Land fronting Roundham Avenue.	(PLGS.09) The suggestion conflicts with adopted Local Plan Policies SS9, C4, C5, NC1, SC2 – no change appropriate.
		PLGS.08	St Michaels Field, Derrell Road and r/o St Michaels Road	< 1 ha	Public	Possible future development of all or part – object to LGS designation	(PLGS.10) The suggestion conflicts with adopted Local Plan Policies SS9, SS11, C4, SC2 – no change appropriate.
		PLGS.09	Oakleigh St. Michaels Allotments, St Michaels	< 2 ha	Public	Allotments – no objection to LGS designation	(PLGS.11) Support noted.

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ID	Name	Submission received				Response summary	
		Road.					
		PLGS.10	Derrell Road Allotments, St Michaels	< 1 ha	Public	Allotments – no objection to LGS designation	(PLGS.12) Support noted.
		PLGS.11	Preston Green, Marine Drive	Abt 3 ha	Public	No objection to LGS	(PLGS.13) Support noted.
		PLGS.12	Parkfield, Lower Polsham Road, South of Parkfield BMX facility	< 2 ha	Public	No objection to LGS designation – however must not interfere with alternative uses of adjoining Myplace.	(PLGS.14) Myplace not included – no change necessary.
		PLGS.13	Coombe Valley Park, South West of Coombe Road, Preston	< 1 ha	Public	Possible future development of all or part – object to LGS designation	(PLGS.15) The suggestion conflicts with adopted Local Plan Policies SS9, C4, NC1, SC2 – no change appropriate.
		PLGS.14	Hollicombe Cliff Park, east of Torquay Road, Preston	< 1 ha	Public	No objection to LGS designation	(PLGS.16) Support noted.
		PLGS.15	Holicombe Park (part of), Torquay Road	< 1 ha	Public	Possible future development of part for café/ cycle hub – no objection to wider designation	(PLGS.17) Support welcomed, if no loss of LGS role – no change necessary.
		PLGS.16	Wills Avenue Playground, Wills Avenue	< 1 ha	Public	Possible future development of all or part – object to LGS designation	(PLGS.18) The suggestion conflicts with adopted Local Plan Policies SS9, SS11, C4, NC1, SC2 – no change appropriate.
		PLGS.17	Preston Gardens, Torquay Road	< 1 ha	Public	Possible future development of all or part – object to LGS designation	(PLGS.19) The suggestion conflicts with adopted Local Plan Policies SS9, C4, NC1, SC2 – no change appropriate.

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ID	Name	Submission received				Response summary	
		PLGS.18	Oldway Mansion Gardens, Oldway Road / Torquay Road	Abt 8 ha	Public	Objection to overall LGS designation as this may cover future possible development areas.	(PLGS.20) The suggestion conflicts with adopted Local Plan Policies SS9, SS10, C4, NC1, HE1, SC2 – no change appropriate.
		PLGS.19	Shorton Valley Woods, Shorton Valley Road	Abt 1 ha	Public	No objection to LGS designation	(PLGS.21) Support noted.
		PLGS.20	Hollacombe Allotments, Hollacombe Lane	< 1 ha	Public	Allotments – no objection to LGS designation	(PLGS.22) Support noted.
		PLGS.21	Sandringham Gardens, Preston	< 1 ha	Public	Possible future residential infill site – object to LGS designation	(PLGS.23) The suggestion conflicts with adopted Local Plan Policies SS8, SS9, C1, C4, NC1, SC2 – no change appropriate.
		PLGS.22	Occombe Valley Woods, off Preston Down Road	Abt 37 ha	Public	No objection to LGS designation	(PLGS.24) Support noted.
		PLGS.23	Lower Penns Road Allotments, Lower Penns Road	< 2 ha	Public	Allotments – no objection to LGS designation	(PLGS.25) Support noted.
		PLGS.24	Scadson Woods, Duchy Drive	Abt 9 ha (within PNP area)	Public	No objection to LGS designation	(PLGS.26) Support noted.
		PLGS.25	Stanley Gardens, off Marldon Road and Barton Road	Abt 1 ha	Public	Possible residential development site – object to LGS designation	(PLGS.27) The suggestion conflicts with adopted Local Plan Policies SS9, C4, C5, NC1, SC2 – no change appropriate.
		PLGS.26	Ailescombe Road	Abt 1 ha	Public	Allotments – no objection to LGS	(PLGS.28) Support noted.

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ID	Name	Submission received				Response summary	
			Allotments, Ailescombe Road			designation	
		PLGS.27	Monastery, Winner Hill	Abt 1 ha	Public	No objection to LGS designation	(PLGS.29) Support noted.
		PLGS.29	Paignton Cemetery, Colley End Road	Abt 4 ha	Public	No objection to LGS designation	(PLGS.31) Support noted.
		PLGS.30	Clennon Valley	Abt 67 ha	Public	Possible future development of all or part – object to LGS designation	(PLGS.32) The suggestion conflicts with adopted Local Plan Policies SS8, SS9, C1, C4, C5, NC1, SC2, ER1, W5 – no change appropriate.
		PLGS.31	Clennon Valley Allotments, Dartmouth Road	Abt 1 ha	Public	Allotments – no objection to LGS designation	(PLGS.33) Support noted.
		PLGS.32	Quay West Corner, Brixham Road	Abt 1 ha	Public	Possible future development site – object to LGS designation	(PLGS.34) The suggestion conflicts with adopted Local Plan Policies SS8, SS9, C4, C5, NC1, SC2 – no change appropriate.
		PLGS.33	Young's Park rec. and wetland area SW of Young's Park Rd, Goodrington	Abt 3 ha	Public	No objection to LGS designation	(PLGS.35) Support noted.
		PLGS.34	Oyster Bend Field, east of Oyster Bend	Abt 2 ha	Public	No objection to LGS designation	(PLGS.36) Support noted.
		PLGS.35	Goodrington Community Orchard, Goodrington Road	< 1 ha	Public	No objection to LGS designation	(PLGS.37) Support noted.
		PLGS.36	Goodrington Village Green, Grange Road	< 1 ha	Public	Possible future development of all or part – object to LGS designation	(PLGS.38) The suggestion conflicts with adopted Local Plan Policies SS8, SS9, C4, NC1, SC2 – no change

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ID	Name	Submission received				Response summary	
						appropriate.	
		PLGS.37	Claylands Cross Park – Brixham Road, North of Harbourne Avenue	< 1 ha	Public	Possible future development of all or part – object to LGS designation	(PLGS.39) The suggestion conflicts with adopted Local Plan Policies SS8, SS9, SS11, C4, NC1, SC2 – no change appropriate.
		PLGS.38	Gibson Road Playground, Gibson Road	< 1 ha	Public	Possible future development of all or part – object to LGS designation	(PLGS.40) The suggestion conflicts with adopted Local Plan Policies SS9, SS11, SC2 – no change appropriate.
		PLGS.39	White Rock Recreation Ground, Brixham Road	Abt 2 ha	Public	Possible future development of all or part – object to LGS designation	(PLGS.41) The suggestion conflicts with adopted Local Plan Policies SS9, SS11, SC2 – no change appropriate.
		PLGS.40	York Road Allotments, York Road	Abt 2 ha	Public	Allotments – no objection to LGS designation	(PLGS.42) Support noted.
		PLGS.41	Hookhills Playground & Park, Freshwater Drive	Abt 1 ha	Public	Possible future development of all or part – object to LGS designation	(PLGS.43) The suggestion conflicts with adopted Local Plan Policies SS8, SS9, SS11, C4, NC1, SC2 – no change appropriate.
		PLGS.42	Primley Park, South of Westleat Avenue	Abt 2 ha	Public	Possible future development of all or part – object to LGS designation	(PLGS.47) The suggestion conflicts with adopted Local Plan Policies SS8, SS9, SS11, C4, C5, NC1, SC2 – no change appropriate.
		PLGS.43	Redwell Road	< 1 ha	Public	Possible future development of all or part – object to LGS designation	(PLGS.48) The suggestion conflicts with adopted Local Plan Policies SS9, SS11, C4, NC1, SC2 – no change appropriate.
<b>Total</b>	<b>6</b>	<b>Respondents</b>					

End of Appendix 11