

neighbourhood plans

From: Helen Boyles [REDACTED]
Sent: 17 December 2017 15:45
To: neighbourhood plans
Subject: Responses to Paignton, Torquay and the Brixham Peninsula's Neighbourhood Plans
Attachments: Response 2 to 3 NPs for Planning Assessor Dec 18th 2017.docx

I attach my comments on the three Neighbourhood Plans, with personal contact details for reference if required. These were not included on the previous (otherwise identical) submission.

Helen Boyles

Torbay's Neighbourhood Plans

Comments from Helen Boyles, [REDACTED]
December 17th, 2017

Torbay's three regional Neighbourhood Plans give evidence of much effort and expertise reflecting a community commitment to protect, enhance and positively develop the distinctive assets of their areas for a sustainable economic future which remains largely dependent on tourism.

There is much to support and admire in each impeccably researched and produced Plan, and I make reference to just a few of their strengths.

Paignton's Neighbourhood Plan

Community Consultation and compliance with Planning Regulations

This is an exceptionally well-researched and detailed plan. Full consultation of the community is evident in all three plans and is particularly well illustrated in Paignton's *NP* in (Document 2: '*Community Involvement and Consultation, 213 pages*).

The Plan's compliance with the requirements of the Neighbourhood Planning (General Regulations) 2012 as well as with National Planning Guidelines is also evident (Doc 4, Fig. 3.1. Statement on page 11.3.33 of the *Basic Conditions* statement).

It is good to see how preparation of this and the other plans, notably that of the *Brixham Peninsula Plan*, conforms with National Planning Guidelines in its compliance with Equality and Public Health requirements as shown in para 5.4 and Appendix IB of the *Sustainability & Habitat Regulations Assessment Screening*.

Production of the Plan has involved voluntary screening in accordance with *Habitats Regulations Assessment*, particularly pertinent to areas within Torbay of high ecological sensitivity. The whole of the Plan's *Sustainability Appraisal* is relevant and of high importance with respect to this (See below).

Investing in Torbay's Assets

This Plan's rightly stresses the importance of preserving and enhancing the features central to the area's tourist industry. Paignton's *Submitted Plan (SP)*, with the maintenance and enhancement of the rich pattern of town, countryside and seaside popular with visitors (*SP*, p. 2)

Jobs before Houses

Importantly, Paignton Neighbourhood Plan's emphasises the Bay's need for jobs to precede housing development. This has all too often been ignored in recent development driven by short term financial interests which has resulted in an increasing number of homes remaining vacant for over 6 months of the year. (See *Submitted Plan*, **2.4.17, i** and **2.4.17 ii**, with Figure **2.4.4, p.17**). These houses are serving not local need, but the second home, commuter, and external rental markets with unsold stock being sold to Midlands and Northern Housing Corporations with a disruptive impact on social cohesion.

The misguided, finance-motivated thinking driving large-scale housing development before jobs is authoritatively supported in *PNP* by statistical evidence that recent large scale housing in the Bay has been accompanied by an actual decline in employment (*Supporting Evidence*, Document 3, pages 12-19, *SP, Submitted Plan*, **Table 2.3.4**, p. 12, and clearly summarised in *SP*, pp. 15 -17). Consistent pressure for large scale housing expansion is also not supported by the Bay's demographics illustrated in *SP*, **2.4.3**, p. 13, in **Table 2.4.1**, which reveals only minimal resident population increase from 2001 to 2016. The worrying implications of this for Torbay's sustainable economic future are neatly summarised in *SP*, **2.4.7**, p. 14.

Employment opportunities

I feel that, in view of the plan's acknowledgement of the severe economic impact of the closure of the large electronics employer Nortel (See *SP*, **2.3.10**, p. 9). the section addressing employment (eg. *SP*, Part 2, a-d, p. 7-12) might consider some productive additional job potential in digitally-based technologies such as the successful offshoot of Nortel, Spirent, on the Yalberton Estate, a firm with an international customer base which develops satellite-testing systems There would be less pressure on the peninsula's precious natural resources if Torbay could build on the success of electronic technologies such as Spirent which, being digitally based, is not reliant on the kind of transportation that demands a more central geographical location and the more sophisticated infrastructure difficult to achieve in the peninsula without adverse environmental impact. These low-impact technologies could offer additional employment opportunities and attract a qualified and younger work force.

Paignton's historic heritage

The plan also correctly emphasises the need to enhance and promote Paignton's neglected historic heritage (As its sub-heading asserts: *The historic heart of Torbay*, 'Paignton's built heritage', p. 24-27), and the urgent need for a regeneration of its centre (*SP*, Part 6, 32- 39, 6.57- 6.78. 'Old Town', p. 42- 43, *SP*, 6.85). I would also argue that a development and promotion of the cultural assets acknowledged in the plan would extend and vary the tourist provision in a way that could greatly benefit the town's economy.

The Plan rightly emphasises the value and sensitivity of Paignton's environmental context, and how this should inform all development decisions (2.5, p. 19- 24). The Plan stresses the importance of this both for local quality of life and well-being and for the tourist industry on which preservation and enhancement of its unique natural amenities depends. ('Western Area', *SP*, 6.102)

Habitat Assessments

Of particular importance in Paignton's plan is Document 4: *Sustainability Appraisal Habitat Regulations Assessment Screening & non-Technical Summary E* (approved by Carol Reeder of Natural England) which assesses environmental sustainability in this environmentally sensitive area. The Plan stresses the need to accommodate endangered species and consider the potentially destructive impact of development proposals on critically rare species such as the Greater Horseshoe Bat. (*SP*, 6.23-6.30, p. 18-19). It rightly stresses the need for officially required Habitat Regulation Assessments to precede

any planning proposals and proceed only if they can supply convincing evidence that any development would not conflict with the needs of these creatures.

Drainage issues

In view of the fact that the Environment Agency has classified the whole of Torbay as ‘a critical drainage area’, the plan is right to stress the urgency of a thorough water assessment before any development is proposed for a site. The Plan rightly emphasises the vulnerability of Coleton St. Mary to flooding and foul water seepage, especially in the increasingly unstable weather conditions of our warming climate. Whiterock is another area particularly vulnerable to this, while also crucial as an environmental amenity, agricultural resource and wildlife habitat. (The area’s water-related risks are clearly stated in *SP*, Annex 3 p. 30-31.).

Green Spaces designations

The plan emphasises the importance of preserving green spaces as a community resource and its precise designation of such areas is very clear, helpful and well illustrated. (‘Paignton’s Rural Character Area’, Appendix 7 Supporting Evidence’, p.183). The Plan reminds us of the Government policy in NPPF109 which draws attention to the need for the ‘planning system’ to protect and enhance valued landscapes, soils and **halt the decline in biodiversity** (Appendix 7, A7.1)

Sustainable Food Production

The Plan rightly emphasises the need to preserve areas of traditional fruit, dairy and vegetable production on environmental, cultural and economic grounds, especially with increased political pressure for national self-sufficiency. We cannot afford to bury under concrete the precious resources of community allotments and high grade agricultural land (as in Whiterock and Westerland Valley) (*SP*, pp. 128, 138, 141,144,149, 153, 173, 170,) Such resources also form an important part of the unique identity of the area highly valued by locals and visitors. Areas such as the traditional fruit- producing valley of historic Yalberton also merit a country park designation (*SP*, p. 174)

Torquay Neighbourhood Plan

Compliance with National Planning Regulations and Torbay Council’s Local Plan

Like the other Plans, this has been ‘produced in compliance with housing projections and figures supplied in Torbay’s Adopted Local Plan, and with policies contained therein’. Evidence of this is fully supplied. It is also creditable that, in common with the other *NPs*, Torquay’s Plan complies with the principles and objectives of the *NPPF* (National Planning Policies Framework) (p. 9) and also supplies positive evidence of the thorough community consultation underlying the proposals and policies (See ‘Consultation Statement’, p. 3 and the Plan’s detailed consultation history which follows).

Sustainable Investment in Torquay's Heritage

In a recognition of Torquay's 'stagnating economy' this plan rightly expresses its commitment to strengthening Torquay's economy and communities by sustainable investment in its 'rich heritage' (*Torquay Neighbourhood Plan (TNP)*, p. 4).

The plan recognises the need to boost the economy of Torquay by investing in its assets. (*TNP*, p. 3). It is certainly right in my view to emphasise the urgent need for new job opportunities to lead the provision of much needed, (*genuinely*) affordable homes 'in the right places'.

To achieve these economic objectives, in its stated aims, the plan stresses the need to 'protect and enhance our natural, built and historic heritage' (*TNP*, p. 4).

Brownfield before Greenfield

Planning 'Objectives' correctly states the need for 'Brownfield development over greenfield' (*TNP*, p. 5). The plan helpfully sharpens the definition of, and distinction between 'Brownfield' and Greenfield sites to avoid any contravention of these designations (*TNP*, p.10). The *TNP* rightly explicitly 'promotes the redevelopment of brownfield sites (as specified in the government's recent *White Housing Paper*), and in particular the Town Centre, as its priority (*TNP*, pp. 6, 11-12).

Supporting Tourism through Sustainable Transport Strategy

I agree with the way that the Plan recognises the need to reinforce its most reliable economic asset of tourism by improving access to central attractions (*TNP*, p. 5) and thus proposes what I consider a sensible strategy and objective for transport infrastructure.

As with the Brixham *NP*, the *TNP* stresses the importance of accommodating and encouraging alternative forms of transport to the car to relieve increasing congestion on main and feeder roads ('Traffic and Movement', *TNP*, p. 5, and elsewhere)

Preserving Community Identity

This Plan also stresses the importance of preserving the unique identity of different communities contained within the composite area of Torquay ('Environment' *TNP*, p. 5). Along with Paignton and Brixham Peninsula, it stresses the importance of respecting and preserving what is unique to the area and underlies its attraction as a tourist destination. It rightly emphasises the need to protect the environment for which much of Torbay has special conservation status. ('Environment', *TNP*, p. 5; 'Economy', p. 5). It recognises the need for sensitive planning policies to sustainably adapt tourist provision from out-moded, unsustainable and seasonally limited (and possibly resource-greedy) models.

The Town Centre (TNP, p. 6).

As with Paignton and Brixham, the *TNP* recognises the need for regeneration of town centres and how this will need to be served by a more cohesive and interconnected transport system which improves accessibility to town centres, their key attractions and facilities. All plans implicitly acknowledge the need to address a currently unsustainable, fragmented and inefficient car and road-dependent transport policy.

The Gateway to Torquay (TNP, p.6)

This section rightly stresses the need for well-designed buildings to positively greet visitors to the region. Recognises the need to improve housing and job provision for residents with minimal destructive impact on the environment and sensitive wildlife habitat.

Brixham Peninsula Neighbourhood Plan

Brixham Peninsula Neighbourhood Plan's demonstrates a laudable commitment to the objective of sustainable economic development based on the provision of jobs before houses and within the topographical and geographical constraints of a narrowing peninsula of environmental sensitivity.

There is evidence of thorough community consultation (See, for example, *Housing Site Assessment (HSA)*, 4.0.2, p. 8).

Realistic and sustainable housing projections

The BNP's rightly emphasises the crucial influence of the Peninsula's unique environmental attributes to its popularity as a holiday destination and its appreciation of the consequent need to respect, preserve and to meet realistic housing projections for proven local need with minimal destructive impact on these natural attractions (*Housing Site Assessment, A*, 3.0.8 and 3.0.9, p.7)..

Brixham Town Centre

The Plan supplies practical and creative suggestions for enhancing the appeal and economic vibrancy of Brixham town centre with the imaginative development of uninspiring areas such as the former multi-storey carpark site, and, as with Paignton, by judicious investment in the centre's cultural assets. (See 9, *Brixham Town Design Statement* and 10, *Brixham Centre Master Plan (BTCMP)*). The Plan recognises that this can only be achieved only by developing an accessible network of interconnected routes and pedestrian ways and investing in an improved and integrated public transport system (*BTCMP*), 3.I and 3.2, p. 6 and 7. This would be challenging, but important to try and achieve.

Investment in assets

(A1.4)

I endorse the plan's emphasis on the need to invest more fully in the tourist-based economy of the area. I share the concern with the need to ensure the Peninsula's sustainable economic future by investing in the distinctive character of the built and natural environment and the leisure amenities which draw holiday visitors (*Policy Document (PD)*, 'Justification for Policy TO1', 10.9 – 10.16). I consider paragraph A1.4.4 particularly important in its sense of wasted or neglected tourism potential and the suggestion (which could have been even more fully and specifically developed) on how we could extend and vary the appeal of the area to attract a wider range of holiday visitors, especially as regards the area's environmental assets (vulnerable to exploitation) and the

rich cultural and historic identity currently largely reliant on voluntary communities and interest groups for its promotion.

International Geopark Status of Torbay

I wholly endorse the Plan's recognition of the need to invest many more resources in promoting the **International Geopark status** of Torbay which probably finds its most dramatic expression in the limestone projection of Berry Head's National Nature Reserve, a Site of Special Scientific Interest. The cultural and economic significance of this geological status and asset (with respect to local and visitor interest) could probably have been asserted even more strongly (A1.4.4).

Relationship of Environment to Well-Being

The Plan astutely acknowledges the relationship of environment and other community amenities to physical and mental well-being, which, with the high levels of deprivation in Torbay, is rightly stressed as an important consideration in planning decisions (*PD*, 8, p. 72).

BPNP rightly emphasises the positive potential of the picturesque peninsula for arts/cultural development. (*PD*, 12, p. 91) Some specific existing and potential arts initiatives might have been mentioned in support of this.

Broadsands Beach Leisure facilities

The Plan is correct to note the need for the positive redevelopment (community inclusive and environmentally sensitive) of the outdated, shabby leisure facilities of Broadsands Beach (*PD*, A1.1.7 and A1.1.8, p. 95).

Drainage

The Plan crucially recognises the peninsula's vulnerability to flooding and how this should influence the nature and density of development (*PD*, A1.2.2, p. 95)

Transport

The Plan addresses the crucial issue of transport and the need for a genuinely sustainable policy that looks at how current networks can be rationalised and improved. This involves reducing dependence on the car by supplying public transport alternatives and connections for cycle and pedestrian use. The Plan rightly recognises that access to urban and rural facilities and their sustainable use and development can be achieved only by a fully integrated transport network. The need to reduce increasing levels of congestion by these means is rightly recognised as an urgent priority (*PD*, A.1 3.9 - A.1. 3.12, pp. 99-100).

(*PD*, Appendix 3, p. 103). I wholly endorse the plan's emphasis on the need to preserve open prospects and distinguish between settlements to avoid faceless suburban sprawl while meeting local housing and employment needs and not self-serving aspirations.

Policy Maps

This section of the BNPB is supplies very helpful documentation to identity significant sites with development allocations, proposals and rejections.

I wholly endorse BPNP's rejection of the site South of Whiterock (previously rejected by a former Secretary of State for large scale development) on account of visual and environmental impact and unsustainable pressure on an infrastructure inevitably restricted by the topography of a narrowing peninsula. (*Policy Maps*, p. 18), *Allocation Maps*, 'Rejected Housing', p.5).

A tourist-based economy is dependent on the preservation of environmentally important sites such as this, on the edge of an AONB and the Dart Valley Area of Special Conservation, and supporting endangered and nationally rare birds and mammals acknowledged by Natural England, the RSPB and CPRE. The loss of open views and merging of settlements and loss of independent community life which would result are unacceptable, as would be the impact on the creatures which breed or forage in the area. The area marked on Policy Map, p. 18 is was formally designated as 'mitigation' for the loss of agricultural land and open space in the recently developed Whiterock 1, but this designation has not been observed in current planning applications (outside both Torbay Council's Local Plan and Brixham Peninsula's Neighbourhood Plan) for the remaining land to the village of Galmpton.

Preserving natural visual amenities such as Whiterock is also crucial to attracting the high-grade technologies to which both Torbay Council and the Neighbourhood Plans aspire. Degrading the area's natural attractions with poorly designed and cheaply constructed housing developments such as Whiterock- especially the high-density Linden Homes development next to the *undeveloped brownfield*, former Nortel site) - will not achieve this aim.

(*Policy Document*, 'Justification for Policy TO1', 10.9 – 10.16). I consider paragraph **A1.4.4** particularly important in its sense of wasted or neglected tourism potential and the suggestion (which could have been even more fully and specifically developed) on how we could extend and vary the appeal of the area to attract a wider range of holiday visitors, especially as regards the area's environmental assets (vulnerable to exploitation) and the rich cultural and historic identity currently largely reliant on voluntary communities and interest groups for its promotion.

Village Design Statements for Broadsands, Churston and Galmpton

The individual 'Village' Design Statements produced with precise guidance from Planning Assessor Liz Beth, emphasise the importance of retaining the individual character of the different settlements within the Brixham Peninsula by respecting, preserving and enhancing their distinctive features, and particularly in the case of villages like Galmpton and Churston, by preserving the green spaces which divide and distinguish them. Along with Churston, Galmpton is distinguished by an extensive Conservation Area illustrated in the *Galmpton Village Design Statement* (Appendix 1, Document 8, page 37) which should be respected in any development proposals. They also highlight the flood risk which has been particularly apparent in the settlements of Churston and Galmpton (See *Churston Design Statement*, Fig. 13). The *Design Statements* are committed to an environmentally sustainable economic growth which does not at the same time

compromise the independent identities of individual areas through a sprawling, suburban merging of settlements (See also: Appendix 3 ‘Settlement Gaps’, *Policy Document*).

Conclusion

I wholly endorse the objective common to all three of Torbay’s plans: a judicious investment in the Bay’s rich natural and cultural heritage and the increased provision of affordable homes (*PD*, 8.2.1, 72) in place of the currently high proportion of second homes, rental investment and commuter homes, which (with the new South Devon Link Road) are threatening to convert the entire Bay into a dormitory area. And even that prospect could be defeated by the progressive depletion or neglect of the Bay’s natural and cultural assets. Each of the plans in my view rightly emphasises the need to preserve the identity and self-sufficient sustainability of our communities and proposes many sensible strategies for achieving this.