

neighbourhood plans

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Attachments: Torbay NP response by 18 Dec.doc02.doc

Torbay Council

Please see attached response from CPRE Torbay in support of Torquay, Paignton and Brixham Neighbourhood Plans.

With regards,

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CPRE Torbay

Support for the Neighbourhood Plans for Torquay, Paignton and Brixham Peninsula

CPRE members have been involved with the NP process from its inception to submission stage. A common thread runs through all three plans. The lack of employment, poor infrastructure and loss of crucial greenspace for housing when 'Brownfield first' has not been applied is of considerable concern to Torbay residents. As we progress to Brexit, with its need for greater self-sufficiency, we cannot rely on a 'saturated building monoculture' that suffocates other social, wellbeing and environmental considerations and ignores such crucial issues as the Bay's transport and employment in a tourist-dependent economy. Communities have fully understood the importance of finding innovative ways to enhance and strengthen their towns and villages to bring back prosperity through a sustainable investment in the Bay's environmental and cultural assets (and not by selling off these vital assets for short term financial gain)

In a 2017 Land Use Map using CORINE satellite technology provides a comprehensive picture of every corner of the UK to identify built on, urban greenspace and farmland. **Torbay comes off very badly and it is time the authorities looked at the implications of what is being imposed on the whole area before it is too late.**

<u>Torbay</u>	<u>Built on 44%</u>		<u>Average UK</u>	<u>6%</u>
	Green Urban 16%	“	“	3%
	Farmland 34%	“	“	57%
	Natural 6%	“	“	35%

Whilst the figure 16% for Green Urban space may appear above average, comparison statistics for other City areas presents a different picture particularly when tourism is vital to the Torbay economy:

	<u>Green Urban Space</u>
<u>Torbay</u>	16%
Bristol	21%
Manchester	30%
Portsmouth	16%
Birmingham	21%
Plymouth	23%

Brixham Peninsula NP

This has been skilfully compiled, with important close reference to the many sensitive environmental factors which must inform all development proposals with a thorough, prior assessment of likely environmental impact. Scrupulous attention has been paid to the

AECOM *Habitat Screening Assessment Regulations* Document (pp. 1-101). (An example of where these guidelines have been applied in a planning decision is provided by the ruling on the Upton Manor Farm application (*Housing Site Assessment*, Appendix 1, A1.1 and A1.2, p. 109-10) The need to consider ecological impact of development proposals is acknowledged by all NPs

(A1.4) *BPNP* emphasises the need to invest more fully in the tourist-based economy of the area. It recognises the importance of ensuring 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.

The Plan makes creative and practical 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. The Forum appreciates that this can be achieved only by developing an accessible network of interconnected routes and pedestrian ways. Brixham Town Centre Master Plan 1-8 which include critiques and proposals for accessible networks for individual areas.

The Plan acknowledges 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).

Policy Maps

These are very clear and accessible for the reader.

(Policy Maps, p. 18). *Allocation Maps*, 'Rejected Housing', p.5. CPRE notes with approval the BPNP's rejection of the site South of Whiterock site (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. A tourist-based economy is also dependent on the preservation of such sites with nationally significant conservation designations. 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 nationally endangered mammals and birds which breed or forage in the area.

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*).

Paignton NP

Paignton has numerous problems which have been fully understood by the NP Forum. Paignton's *Submitted Plan* (SP), rightly supports the maintenance and enhancement of the rich pattern of town, countryside and seaside popular with visitors (SP, p. 2). It appreciates the need to preserve the unique attractiveness both of its environmental context and built heritage and identity.

The Plan recognises the urgent need for the regeneration of Paignton's neglected centre (SP, Part 6, 32- 39, 6.57- 6.78. 'Old Town', p. 42- 43, SP, 6.85) and makes many intelligent, well supported suggestions on effective ways of regenerating its cultural assets, accurately representing it as *The historic heart of Torbay* ('Paignton's built heritage', p. 24-27). It asserts the need to preserve and enhance the features central to the area's tourist industry, while extending and varying the tourist provision.

PNP appreciates how the town's environmental context and its wildlife and drainage-related sensitivity should inform all planning decisions (2.5, p. 19- 24). In common with the other Plans, it stresses the crucial importance of Thorough Habitat screening assessments to precede development ('Western Area', SP, 6.102) and The Plan rightly 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).

Highly significant is the Plan's recognition of the Bay's need for jobs to *precede* housing development, and the way that this is authoritatively supported in the plan by statistical evidence that recent large scale housing in the Bay has been accompanied by an actual decline in jobs. (Document 3, *Supporting Evidence*, pages 12-19, with Table 2.3.4 and other Figures and Tables, and clearly summarised on page 15 -17 of the *Submitted Plan*).

The Plan reveals how pressure for housing expansion is not supported by current demographic evidence:

Supporting Evidence, Doc . 3 applies to all three Neighbourhood Plans. See, for example, List of Figures and List of Tables:

Jobs numbers 2012 – 2015 Table 2.3.3, Page 12

Jobs numbers Table Fig. 2.3.4, Page 12

Population change 2007 – 2016 Table 2.4.6, Page 17.

The extensive study and photographs for Local Greenspace Designation page 102 -185 is highly comprehensive and offers great clarity to the reader. Page 108 figure A5.1 pin points how fragile and pressured the environment is and the social psychological and ecological importance of local greenspace.

Torquay NP

Torquay's NP recognises the need to boost the economy of Torquay by investing in its assets. (*Neighbourhood Plan*, p. 3) and emphasises the urgent need for new job opportunities to lead the provision of (genuinely) affordable homes

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

'Planning Objectives correctly states the need for 'Brownfield development over greenfield' (p. 5). The plan helpfully sharpens the definition of, and distinction between 'Brownfield' and Greenfield sites to avoid any contravention of these designations (p.10). The *TNP* rightly explicitly 'promotes the redevelopment of Brownfield sites, and in particular the Town Centre, as its priority.

The Plan recognises the need to reinforce its most reliable economic asset of tourism by improving access to central attractions (*NP*, p. 5) and thus proposes what we 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', p. 5)

The Town Centre, 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'

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

All 3 plans are united in their aims to support a sustainable and positive future for the Bay's communities by investing in its unique environmental and cultural assets through judicious and proportionate development which meets proven local need and invests in, rather than compromises its tourist-based economy.

15 Dec 2017