

neighbourhood plans

From: [REDACTED] on behalf of Torbay Green Party <torbay@greenparty.org.uk>
Sent: 17 December 2017 19:11
To: neighbourhood plans
Cc: dwdw@paigntonneighbourhoodplan.org.uk; Torbay Green Party
Subject: TORBAY GREEN PARTY: Comments for Assessor on Submitted Paignton Neighbourhood Plan (See attached PDF & below)
Attachments: FINAL Torbay Green Party Views On PNP for Independent Assessor by Mon 18 DEC 17 FINAL.pdf



Green Party *Torbay*

Torbay Green Party

By email to:

neighbourhood.plans@torbay.gov.uk

Spatial Planning

Torbay Council
2nd Floor
Electric House
Castle Circus
Torquay
TQ1 3DR

17 December 2017

Dear Sir/Madam,

Regulation 16 Consultation: Comments on The Submitted Paignton Neighbourhood Plan

These are the views of the Torbay Green Party for the independent assessor to consider (when appointed) in regard to the Submitted Paignton Neighbourhood Plan (PNP) given to Torbay Council on Friday 18 August 2017 and for response by 0900hrs on Monday 18 December 2017.

General Support for the Plan

Torbay Green Party supports the submitted PNP for similar reasons to those set out in comments during the Pre-Submission Consultation which closed on 31 May 2017.

The content of the plan positively complements the Torbay-wide balance of 3 neighbourhood plans with the Torquay Neighbourhood Plan, for northern Torbay, and the Brixham Neighbourhood Plan, for southern Torbay, which have been also been produced for the area.

Importantly, the plan supports and conforms with the strategic policies of the Torbay Local Plan and moves beyond Torbay-wide policy with more nuanced resident-led neighbourhood and sub-neighbourhood planning not offered by just a simple local plan covering the whole Torbay Unitary area. The evidence provided means that there is no need for further development sites to be submitted and sufficient provision has been made for a rolling 5-year housing supply.

The PNP policies prioritise a balanced approach to development which will help safeguard Paignton`s socio-economic and environmental well-being and defend the plan area from unsustainable outcomes.

This is immediately relevant since over 3,000 less people are employed in Torbay than 16 years ago and, to date, **net job growth has not occurred yet** during the period of the current Torbay Local Plan (2012-2030) – but new homes are still being built. And, local and national biodiversity levels continue to fall across the whole spectrum of the UK`s fauna and flora.

Torbay Green Party supports the PNP for the following reasons:

- It promotes the delivery of net job growth before housing provision to improve and help relieve local social and economic deprivation;
- It ensures that population and retail floor space are always kept in check to help maintain the vitality of local shops and businesses;
- It safeguards and enhances green infrastructure and biodiversity within the constraints of the National Planning Policy Framework (NPPF) and the important exception of NPPF119 which mandates EU birds and habitats directives in regard to the integrity of the South Hams Special Area of Conservation – which covers two thirds of the PNP area;
- It supports and values the landscape character of Paignton`s hinterland countryside to deliver gains in biodiversity, soil quality, community wellbeing and the rural economy;
- It recognises the value of local parks, woods, greens, fields and natural areas to local residents by designating them as Local Green Spaces;

- It helps protect the natural world and prevent pollution by progressing South West Water and Torbay Council's recommendations regarding surface water runoff;
- It safeguards and encourages local food growing and production to deliver community social and health benefits; and
- It supports renewable energy and encourages improvement in the energy efficiency of the built environment to help Paignton and its residents adapt to and mitigate climate change.

Support for Local Green Spaces

Torbay Green Party strongly supports the proposed designation of 62 of Paignton's local parks, woods, greens, fields and natural areas as Local Green Spaces. They represent a total land area of less than 320 hectares and in reality very little green space to serve a local population of 43,000 – plus many times that number of annual visitors. Such areas are thus at a premium and enormously important for the whole palate of 'ecosystem services' they provide such as:

- Filtering pollutants;
- Cooling our streets;
- Managing storm water;
- Storing carbon;
- Reducing stress;
- Providing food;
- Improving health and reducing obesity; and
- Protecting biodiversity.

We endorse their designation and encourage several more to be recognised and approved to better serve Paignton, its visitors, and its residents into the future.

Suggested Improvements

The suggested enhancements set out here are submitted to further positively assist the final emergence of the PNP into the statutory landscape and improve its 'in use' functionality.

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.

1. Paignton Neighbourhood Plan (main document)

Paragraph, Policy & Page	Suggested Enhancement/Change	Reason
<p>Policy PNP1 – Area Wide Policy</p> <p><u>Sustainable balance and design</u></p> <p>Page 17</p>	<p>Add a paragraph to this section of the policy:</p> <p>'a presumption that buildings are refurbished rather than demolished – even when they are not in a conservation area or are not listed – with the developer required to demonstrate that any demolition being considered is the most sustainable low-carbon option'</p>	<p>To action sustainable national and local policies in the plan area:</p> <p>(1) re-using land (NPPF111); and</p> <p>(2) minimising CO2 emissions during the lifetime of the scheme to produce climate-friendly outcomes (NPPF95 & 99, Local Policy SS14).</p>
<p>Table 6.1 Local Green Space locations</p> <p>Site Name</p> <p>PLGS.05</p> <p>Page 25</p>	<p>Queens Park (private)</p>	<p>To remove incorrect and anomalous description of site name.</p>
<p>Annex 2 to Policy PNP1</p> <p>Design Guide</p> <p><u>Towards a sustainable low carbon energy efficient economy</u></p> <p>Page 28</p>	<p>Add a paragraph, after criteria 28), to this section of the Design Guide policy: 'add drinking water fountains and refill stations to the public realm of the Core Tourism Investment Area, Town Centre and Seafront, Goodrington Seafront, or Hollicombe where development is planned in such areas'</p>	<p>To cut plastic-derived CO2 emissions and reduce plastic entering the waste stream, or polluting sites across the plan area, or entering the Lyme Bay and Torbay Marine Special Area of Conservation.</p>
<p>6.53</p>	<p>'areas of Paignton is an are areas of increased flooding'</p>	<p>Grammatical improvement.</p>

<p>Annex 3 to Policy PNP1</p> <p>Water risks locally</p> <p>Page 30</p>		
<p>6.86</p> <p>Policy PNP11 – Old Town</p> <p>Final paragraph</p> <p>Page 42</p>	<p>Amend final paragraph of PNP11 policy to:</p> <p>‘in accordance with NPPF73, 71 74, and 76.’</p>	<p>Correction of the typo which gives incorrect national policy for this proposed area of Local Green Space.</p>
<p>6.121</p> <p>Policy PNP22 – Western Corridor</p> <p>Page 58</p>	<p>Add a paragraph, g), to Policy PNP22:</p> <p>‘the provision of a bridge or underpass across Brixham Road at both Roselands and Tweenaway Cross for pedestrians and cyclists.’</p>	<p>To deliver the policy objectives of PNP22, (page 58), and area sustainable transport policy of the Design Guide criteria 37) Annex 2 to Policy PNP1 (page 29).</p>
<p>Blatchcombe – Designated Local Green Space</p> <p>PLGS 61 Brake Copse, Totnes Road</p> <p>Page 93</p>	<p>Change map to add field to the north-west of and adjoining the wood to the proposed Brake Copse PLGS designation</p>	<p>The field is used as the only public access to the proposed Brake Copse PLGS, it serves the community in a similar fashion, and it is of equal value to the community served. It therefore should be part of the Brake Copse Local Green Space.</p>

2. Supporting Evidence (Document 3)

Policy/Paragraph and Page	Suggested Enhancement/Change	Reason
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<p>Table A5.2: Further information about each site</p> <p>PLGS. 61: Brake Copse, Totnes Road</p> <p>Page 177</p>	<p>Size: <3 ha <7 ha</p> <p>Change map as 1. above</p>	<p>As corresponding 1. PLGS change above.</p>
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Conclusion

Torbay Green Party hereby submit comments for the independent assessor to consider in regard to the submitted PNP and look forward to ratification of the approved PNP.

We gratefully acknowledge, thank and support all the community volunteers who have embraced localism and made such a positive contribution to Torbay by successfully rising to the challenge of producing and delivering this impressive neighbourhood development plan to serve Paignton, and its residents, to 2030 and beyond.

Yours faithfully,

Dr Sam Moss

Chairman, Torbay Green Party





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