

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

PROPOSED SUBMISSION PLAN (FEBRUARY 2014)

PROPOSED REPLACEMENT ADDITIONAL MODIFICATIONS TO THE SUBMISSION LOCAL PLAN

LIST OF REPRESENTATIONS BY PERSON/ORGANISATION IN TOPIC & ALPHABETICAL ORDER

Consultee ID	File No.	Person /Organisation Consultee	
Private Individuals – Paignton			
428525	RAM PI1	Bristow	Roger
923426	RAM PI2	Miller	Susan

Pickhaver, David

From: Roger Bristow [REDACTED]
Sent: 30 July 2015 19:34
To: Planning, Strategic; Young, Robert
Subject: RMM's and RAM's
Attachments: Comments on MM.docx

Please find attached my comments on RAM's and RMM's

Comments on RMM's and RAM's.

The reason for putting all the comments in one document is that some of the RAM's could be considered as RMM's and that both are interlinked and have an effect on each other.

Under "About this Document."

The jobs to be created total is even more unrealistic considering that Council documents show that there was a loss of 1,300 jobs in one year alone, added to which the amount of employment land that is now designated at 75% housing and 25% employment will automatically reduce both minimum and maximum job creation figures, not just maximum. Even then the numbers are ridiculously high considering that we are 3 years into plan and the FTE jobs are less than at the start of the plan and the job creation target for the first 5 years is higher than any other 5 year period; therefore the number of houses required are far too high especially as in the previous 10 years (2001 to 2011 census figures) 5,000 houses were built and there were less FTE jobs, and a very low increase in population. Mid range of the original plan for housing was 9,000, this has been reduced by only 100 houses but one year less time period effectively increasing the house per year from 450/year to 468.5/year! This fact alone turns the plan into a housing led plan not a Jobs and housing balanced plan, which will create an even bigger housing glut and job deprivation. Further proof of housing does not create jobs is that between 2008 and 2011 there were an average of 390 houses built per year and yet construction jobs fell by 600 (BRES) and total employed fell by 2,400 (BRES).

RMM1

SS1. I agree with safe guarding natural and built environment, and annual housing land monitoring, but would like to see net jobs (only those that are full time and above minimum living wage as they are the only ones that are likely to make housing purchase viable) monitored at the same time to help prevent housing outstripping jobs or vice versa. You cannot improve or maintain natural beauty of the bay by building on green fields, there is a lack of brown field sites being promoted in the early stages of the plan, which to me seems to be a case of build on all possible green fields to get the New Homes Bonus and then use brown fields, which is against the NPPF. 60/40 brown to green advice, this should be maintained in any single year of the plan and the large majority of the first 5 year housing already approved is on green fields, contrary to NPPF and therefore not sound.

450 houses per annum in the first 5 year period is excessive as we are 3 years into the period the job increase is still negative, meaning the job creation target is already a minimum of 825 jobs behind and 1,440 houses with planning permission ahead, which is a recipe for disaster for the Bay's economic growth. Again this makes the plan unsound. Add into these figures the number of empty houses now which makes the situation even more unbalanced.

Why has the job creation target been removed? Is it because it is no longer a balanced plan but just a plan to uncontrollably build as many houses as possible, as quickly as possible, and on green fields to get the maximum New Homes bonus before it is cut?

Identified sites. This section only takes account of an under build and ignores any possible over build due to lack of new net job growth or lack of economic growth, again making the plan unsound.

Strategic Delivery Areas:- All developments in the Future Growth Areas need to be subject to environmental impact assessment, as do all developments on green field land.

RMM2.

4.1.25:-Active developer interest in Future Growth Areas all of which are greenfield sites should have no bearing whatsoever on bringing forward these sites unless brownfield sites have been used to conform with the NPPF balance figures of 60% brownfield 40% greenfield, and all necessary infrastructure should be in place, not in tandem with, prior to development.

Paignton in particular has severe problems with clean and foul water capacity (currently a single pipe system much of which is of the Victorian era). There are already 2 sites in the White Rock area which South West Water are not satisfied with the applications attempt to satisfy the clean/foul water situation. There are also severe Infrastructure restraints in White Rock, Yalberton and Collaton St. Mary with regards traffic, all of which will have to pass through Tweenaway junction which despite improvements made and those proposed will be of little use without the hill section of Kings Ash Road being bypassed as widening it would only be possible by purchase and demolishing all the housing on this section which is impractical, and the bypass of this section was discounted years ago. The A385 from Tweenaway Junction to Totnes is already over capacity at busy times and improving flow will be difficult without Devon County's cooperation and considerable expense to all parties, which considering the consultants housing figures for Collaton St. Mary would make the whole scheme for this area unviable to developers unless major grants come forward from elsewhere. Environmentally the traffic pollution is already killing conifers along the road and one can't but wonder how much air pollution is affecting the school's pupils and teaching staff, so more would be even harmful, monitoring air quality at the school is urgently needed. Once again only under build is taken into account removing any balance in the plan between jobs and houses and is just an excuse to build whatever, wherever in order to overcome any local objections and to increase income by building on Council owned land and green fields to obtain more new homes bonus income. Plan is therefore unsound as it only considers more housing and not less and no link to FOAN or jobs!

RMM3.

All green field developments wherever they are in Torbay should be subject to EIA's and all must have mitigation for all protected plants and species which can be proven to work, or acceptable to Natural England along with other protection bodies.

RMM 3a.

As noted by comments on RMM 1, 60% into the first period and we still have negative job growth, zero hour contracts, part time and split shift working and lack of economic growth. All of which prevent the affordability of housing for local residents. I can see no possibility of the turnaround in job growth let alone achieving the lowest figure of job creation (1,250) in the next 2 years. Between 2008 and 2011 there were approximately 500 houses built/year and yet in the same period there was a loss of 600 construction jobs (BRES data) therefore proving that building houses does not grow jobs. Plan unsound due to being highly unlikely to achieving job growth targets.

RMM4.

Housing figure still far to high.

RMM5.

Such a high figure of housing cannot be achieved without harm to the environment, tourism (quality of environment), and economy (severe lack of jobs and no evidence of improvement in net job growth especially regarding jobs which would make housing affordable to locals). Why are local planning forums not mentioned in the consultation list? Again the plan only considering bringing forward sites and not the possibility of holding up sites until jobs are created and economic growth happens. Excess unaffordable housing is contrary to the principal of FOAN, NPPF 47, and a balanced plan and therefore another reason that the plan is unsound.

RMM6. DCLG projection figures should only be used as a guideline for the maximum because their projections figures have consistently been excessively to high year on year. This happens because of the failure to properly factor in Torbay's naturally decreasing population

and the calculation includes a set formula for growth, which does not take into account periods of depression and economic slump. Combining these two reasons would greatly reduce the current figure and would continue to reduce the projection until such time as the economy is back to its pre 2008 growth rate. Using these figures to promote increased house building is based on an inaccurate basis and is therefore unsound. Whilst economic success is highly desirable there is at present (3 years into plan period) there is no indication of economic growth in Torbay, and no evidence of returning to pre 2008 inward migration. Correct figures show that up to 2012 it has been rapidly declining. To use these figures to show the need for increasing housing supply will cause a glut of housing and consequently an economic downturn and cause great harm to the soundness of the plan.

RMM 7.

SS12. New housing completions and permissions should also fall if viable net jobs creations do not meet expectation, in order to maintain a healthy balance of viable jobs/homes. This is missing from the modifications. It is worth noting that a development of a block of living assisted apartments has been put on hold by the developer until market conditions improve, this shows that the market is still in recession even with the number of homes for the elderly that are being closed, and although the area is one of the top 10 second homes areas in the country that there is little demand for new house. (Even the developers do not expect more than 20 to 25 completions per year on any one site)

New applications should not be permitted despite the rolling 5 year figure where:

1. Housing / jobs are out of balance and houses exceed the increase in viable jobs.
2. Where the proposal leads to any shortfall in any infrastructure
3. The needed infrastructure is not complete before construction.
4. The proposal is on green field land if there are brown field sites available in the vicinity. (Suggested at least a 2 mile radius)

Net FTE jobs increase/decrease figures should also be available for the yearly monitoring to maintain an effective balance. No.3, there should not be any sites brought forward unless FTE jobs increase demands it, this section is promoting unjustified house building and therefore makes the plan unbalanced and unsound. Nowhere does the plan establish the jobs to homes ratio without which gives the Council the means of excess house building, again unsound. FOAN needs cannot be reduced unless sufficient jobs are available and sufficient social/low cost homes are built, at least 30% plus bedroom calculated should be required regardless of quantity of new houses (anything 3 and over)

This whole section of the proposed modifications is seeking reasons to build more houses than necessary without considering job figures, economic growth and viability, which will create an unsound plan when housing further exceeds job and economic growth. With regards to early review trigger point the time is now because housing applications have been granted whilst job creation is negative creating an imbalance (too many houses and negative job growth) .

RMM 8.

4 5 40 replace the words "likely provision of jobs" with "firm factual provision of new viable jobs". Screwfix has opened in Torquay creating 16 jobs and a pub/restaurant is also opening and creating up to 50 new jobs, plus a new Aldi store, but how many of these will be full time and above minimum living wage? Very few probably, and this number of jobs is insufficient to overcome job losses since 2012 and which are continuing to happen. B and Q are warning of job cuts, store closure and even disappearing altogether, major stores are cutting back expansions already the new Morrisons local in Paignton has reduced its opening hours and may yet close, the council alone admit the loss of 350 jobs including senior posts in the last 3 years (Herald Express 24/06/2015 Steve Parrock interview). In the town centres more shops are closing than are opening. There is no justification in continuing to permit new housing growth to continue unless net, FTE, living wage, jobs are created NOW.

The trigger point is only considering increasing the rate of house building and not the reverse making the supposed jobs/homes balance basis unrealistic and unsound especially as the trigger points are all based on needing more homes to be built and no consideration of the reverse.

This section of the plan shows no intention of balancing homes with jobs but merely gives the Council the opportunity to build, build, build regardless of the consequences.

RMM9.

SDP1. The number of houses required are not balanced against the actual FTE, above living wage, and permanent jobs that will be created. Empty shops, empty units, and undeveloped employment land do not create jobs, but only create the possibility of jobs, which does not help locals to buy the houses being built now.

RMM11.

This level of building would still more than double the existing houses in Collaton St. Mary which is contrary to the NPPF as you cannot double the size of the village without altering its village environment and looks. The Masterplan at present does not provide the level of facilities for the village that would prevent it becoming yet another deprived area of Torbay, it would also begin to merge the village with the urban expansion of Paignton.

RMM14.

If there is unused capacity in the car parks it could be the actual cost of parking that is the problem, which in turn leads to shoppers using out of town centre shopping areas which have free parking and remove trade from the dying town centres.

RAM 2.

Growth within infrastructure constraints is virtually zero as road improvements are negated by the severe constriction at Kings Ash Road (particularly the hilly part) and the sewer capacity requires that new larger mains are installed and a separated clean water run off system is installed. There is no allowance for any of these necessary improvements in the plan and therefore positive growth is severely restricted.

RAM 4.

The Councils assessment cannot be relied on, as some sites have not been fully assessed with regards to environmental constraints, flooding, and protected species habitats. Until such time as all sites have been fully assessed their capacity is unsure and therefore the assessment is likely to be unsound.

RAM 5.

As this modification only considers the necessity to increase housing land supply and does not consider the need to decrease or hold back land supply in case of lack of assumed job growth leading to excess of housing, then this part of the plan is unsound.

RAM 10.

The Council has not taken into account the decreasing in migration trend, and provides no hard evidence or reasoning that this trend will be reversed. The projected decrease in household size is not happening because of the lack of well-paid and permanent jobs, the Bay is still suffering more job losses than gains. There is no justification to alter the plan period and it is not clear just exactly what the plan period is, 15 years 19 years or 20 years, all of which have been muted since the release of the proposed plan. Because of these facts the plan is unsound.

RAM 16.

The boundaries marked with dashes do not appear to coincide with the actual growth areas as specified elsewhere. This could cause confusion to both developers and planning committees, which could result in costly and unnecessary appeals and therefore unsound.

RAM 17.

Mitigation measures are not a solution unless they can be proven sustainable, practical, and affordable. As proven by the Churston Golf Club appeal.

RAM 74.

This is not a minor amendment. Both Devonshire Park (former Nortel site) and Jacksons Land were previously allocated as 100% employment land, as they currently stand 50% housing 50% employment. To reduce the employment land on these two sites alone to 25% would effectively harm the potential expected job growth and promote further reductions in employment land and likely job growth on other mixed sites. If employment areas are reduced and therefore job capacity reduced then there is no need for increase in housing. There is also the fact that the application for Jacksons land covers more green field land than the original proposed Jacksons Land and therefore is still outside of the old or new plan's employment/housing growth area and a further unnecessary intrusion into greenfield land.

RAM 129.

To effectively reduce the % of affordable housing is contrary to the Housing Needs of the bays populous and therefore unsound, considering that the Councils own figures show the need for social/affordable housing is 60% and they are only asking for 30% on the largest of sites means that the needs are not being met. All housing sites of 3 and above should provide at least one third of affordable housing based on the number of bedrooms not units of housing in order to help towards meeting the NEEDS.

RAM 169.

The consultants document on the drainage systems stated that the amount of waste water produced by households would need to be reduced by 15%, climate change and Urban Creep would not affect the quantity of run off into the drainage system, and a robust system of extracting existing run off into the combined sewer system is put into place. It also admitted that this was highly unlikely to be achieved. This does not seem to have been fully taken into account. Evidence of this is shown by South West Waters comments on the recent plans for Devonshire Park and Jacksons Land. Without putting into place a system which separates clean and foul water drainage will only cause more overflows of both types (as some residents in Collaton St.Mary have experienced) It should also be noted that the sewer pipework in one area of Collaton St.Mary which has been examined by Exjet has been given a grade of 5 (meaning not repairable and needs imminent replacing)

RAM 178.

Table 7.1 there is no figures for the planned for job creation to compare with the housing numbers completed which is vital to keep the plan a balanced one. By leaving out the jobs/houses comparison the plan becomes purely housing led and disregards any balance making the plan unsound.

RAM 181.

Whilst agreeing to the addition of Hollicombe Head to RIGS, why is Yalberton Valley not also been added particularly with the evidence submitted by the Yalberton Valley Community Forum which includes references to the caves having been used historically by man.

RAM ANNEX 1.

The 2 sites in stage 4 of the Collaton St.Mary Masterplan are in the Councils Amber and Red notation of restricted sites and this fact combined with the so far over supply of housing should be removed from the Masterplan. If this was done it would prevent developers from incurring unnecessary costs on sites which are very unlikely to come forward in the current 20 year proposed plan. The proposed changes to Clennon Valley are also not needed in the totals particularly as they are in or on the edge of a flood plain.

Mr.R.E.Bristow
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TQ4 7PW.

Pickhaver, David

From: Susan Miller [REDACTED]
Sent: 30 July 2015 22:19
To: Pickhaver, David
Subject: Objection to RMMs

Dear David,

Thank you for your reply to my first e mail.

May I clarify that my objections are to the replacement modifications to the Torbay Plan.

Number 1 The Environmental Capacity of the Area and mismatch of jobs and Homes

Referring to these policies - Policy SS11, RMM5 and RMM 6 and RMM 7, RMM 8 and RAM 4 Paragraph 1.1.8, RAM 5 Para. 1.1.15, RAM 10 Paragraph 2.2.13.

The 8,900-housing development proposals do not match an existing or likely increase in jobs. Pat Steward (Senior Service Manager for Strategic Planning and Implementation at Torbay Council), has verbally admitted at a hearing (and the fact confirmed in print) that there has been no increase in jobs since 2012, and yet many hundreds of houses have since been built, with many more thousands proposed.

I agree with the GRA who recommend that there should be a willingness to make a downward adjustment in housing numbers to accord with population and employment trends and needs within Torbay rather than supplying second homes, and developing Torbay into a dormitory town. Otherwise the unique environmental attractions of the area, which have always been its primary economic asset, will be progressively degraded.

Number 2 Jackson Land (Brixham Road, Yalberton)

Referring to these policies - (SDP 3,4.), RAM 74 Para 5.2.2. 10

Local large-scale housing proposals have failed to take account of the environmental impact of habitat loss, or observe the requirement for preliminary environmental assessment required by Natural England. (which is expensive and time-consuming..). This applies to the proposed development of 192 houses on Jackson Land adjoining the Yalberton Estate, in anticipation of which a copse has already been felled. The possible impact of this development on the endangered horseshoe bat and the cirl bunting population, both of whose foraging territory incorporates some of this area, has not been considered. Neither has the lack of obvious access to the proposed development, and how this would be supplied.

Number 3 Coleton St. Mary (RMM Annex 1)

Referring to these policies - Paignton North-Western Area; Policy SDP3, Policies Maps, Sheets 23, 24, 26, 27). Also as regards the area's vulnerability to flooding, with relation to its Foul Water Capacity: Paragraphs 6.5. 3.26). Area judged 'Highly Sensitive' in The Torbay Landscape Character Assessment (SD9 2b).

The plan fails to consider the vulnerability to flooding of proposed development land at Coleton St Mary. This development does not take note of the Environmental Agency assessment, which, in June 2015, designated Torbay a 'Critical Drainage area'. The proposed growth areas in Coleton

St. Mary should now be removed from the Plan. It's designation as 'Future Growth Area' should be changed to 'Countryside Area'

yours sincerely Susan Miller