

Representation by the Torquay Neighbourhood Forum on the revision to the Local Plan for Torbay dated February 2015

Comments identified with original reference.

AM19 (4.1.32)

Masterplans have been prepared for Torquay Gateway, Great Parks Paignton, and Collaton St Mary, Paignton as well as Torquay and Paignton Town Centres. These are expected to inform Neighbourhood Plans. Alternatively, they may be further consulted on as Supplementary Planning Documents”.

Mater Plans are a key element of the Neighbourhood Plan and subsidiary to them; as such they must be compliant with our Plan and by inference the wishes of the local community. As the current Master Plans have not been developed jointly with the Neighbourhood Forum (we were not a formal consultee to the Council’s process) then they should not be subject to a Supplementary or Development Planning Document unless the Neighbourhood Plan is not adopted or there is little prospect of it succeeding.

MM2 4.1.25

Where there appears to be a risk of a shortfall of deliverable sites against the Local Plan rolling five year requirement, or overall housing trajectory, the Council will bring forward additional sites through site allocations development plan documents. In order to avoid a policy vacuum occurring after year 5 of the Plan (i.e.2017), the Council will start to prepare site allocation documents if neighbourhood plans, which meet the necessary regulations and are in general conformity with the Local Plan, have not been Submitted to the Local Authority by October 2015.

MM8 4.5.40

To deliver the second phase of the Local Plan and avoid a policy vacuum after 2017, the Council will assess the proposed emerging Neighbourhood Plans when submitted to the Council, under Regulation 15 of The Neighbourhood Planning (General) Regulations 2012, to check that Plan proposals endorse and implement the strategy in the Local Plan. If Neighbourhood Plans are not submitted to the Council in a form that it is in general conformity with the Local Plan by October 2015, the Council will commence production of site allocations development plan documents, in order to provide sufficient time to produce and adopt any Site Allocations DPDs that may be required.

The October 2015 timescale is too short to allow the Neighbourhood Plan sufficient time to have comfortably reached an appropriate stage. We suggest May 2016 unless it is reasonably and mutually clear there is little chance of the Plan succeeding.

The production of the sites Development Planning Document must be stopped once the Neighbourhood Plan is submitted to the Council.

If at any time the emerging Neighbourhood Plan has identified development sites to meet the targets set within the adopted Local Plan those sites must be implemented through any Development Plan even if the timeline for the Neighbourhood Plan is behind schedule.

MM& SS12

Where the supply of specific deliverable sites **(plus windfall allowance)** falls below this figure, **or Neighbourhood Plans do not identify sufficient sites to provide sufficient land in years 6-10 of the housing trajectory**, the Council will, either:

1). bring forward housing land from later stages of the Plan, working closely with land owners, developers and Neighbourhood Forums; or

2). identify additional sites through new site allocation development plan documents, or

Future development sites must be determined through the Neighbourhood Forum or the Community Partnership system as otherwise the successful engagement with the local community through decision making on a community basis within the Neighbourhood Planning process will be lost and would not be compliant with the Localism Act.

MM14 AppD SDT1/2

Torquay (SDT1)			
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SDT2 Torquay Town Centre & Harbour	670	950	+50 Town Hall car park (food retail led development site with potential for housing as part of a mixed-use development) +65 Temperance Street, +20 Lwr Union Lane, +60 Terrace car park +50 Sheddon Hill, +20 Meadfoot car park, +13 Brunswick Square (+278 total)
SDT3 Torquay Gateway	745	745	
SDT4 Babbacombe and St Marychurch	255	335	+10 Chilcote Close, +70 Smalldon Lane/Moor Lane
Elsewhere in SDT1 (excluding SDT2, 3 & 4)	1025	1050	+25 Sladnor Park
Small windfalls <6 dwellings)	1170	1170	
Torquay sub total	3865	4250	

The additional numbers of homes and the sites required for the Torquay area have been included without consultation with the Neighbourhood Forum and based largely on Council owned assets. These may not be supported within the Neighbourhood Plan due to the conflict with other community based requirements for the sites, capacity of car parks to serve the town centre and the potential preference by the community for other sites not identified within the SHLAA to fulfill the housing and jobs needs for Torquay.

There is a concern that the changes to the housing numbers for Torquay are not based on an independent assessment of suitable capacity for the Torbay area and use potentially unsound predictions for numbers of homes. I am therefore concerned that this part of the Local Plan has not been objectively assessed.

Leon Butler

Chair Torquay Neighbourhood Forum

19th March 2015