

PAIGNTON NEIGHBOURHOOD FORUM

- Blatchcombe
- Clifton with Maidenway
- Goodrington, Roselands & Hookhills
- Paignton Town
- Preston



c/o 34 Totnes Road
Paignton
TQ4 5JZ

31st October 2012

By Email
To pat.steward@torbay.gov.uk
Senior Service Manager
Spatial Planning
2nd Floor, Roebuck House
Abbey Road
Torquay
TQ2 5TF

Dear Pat

Torbay Local Plan Consultation Draft – September 2012

Thank you for the opportunity to comment on the draft Local Plan. Attached are the views of the Forum in a schedule that sets out the response to each question contained in the draft documents recently published by the Council for consultation.

As you know, the Forum supports in full the overarching objective of seeking to improve the economy of Torbay, especially in the next five years to address local need.

However, the Forum is concerned that the draft Local Plan sets out a scale and pace of 'aspiration' beyond the first five years that seeks a return to the high level of in-migration seen in previous decades. This carries with it consequences for Torbay that would be damaging and not consistent with the requirement for sustainable development contained in the NPPF.

More specifically, it is recognised that Torbay's resident population would reduce if it were not for a compensating level of in-migration. However, the census results of 2011 have shown how a major loss of employment in the last ten years has been accompanied by a significant shift in the age structure of the resident population. The results confirm the Forum's view that greater emphasis needs to be given to ensuring there are more jobs in the Bay before too many additional homes are provided. Otherwise, it will add to our needs, not solve them.

Three basic questions have been considered by the Forum when reviewing the draft:

1) Why 15,000 additional jobs?

There are 3,600 currently unemployed residents in the Bay. A 'jobs first' priority to meet this initial need is very clear, and is supported fully. However, we can expect to see 9,000 fewer residents of working age by 2031 as a result of natural change. Turnover will provide a continuity of job supply that will help meet this natural change need locally. Providing for job growth significantly over and above this need will generate further pressures, not solve them. This is not planning for decline. It is seeking a more sustainable balance between the Bay's needs and ability to meet them.

2) Why 8-10,000 additional homes ?

Similarly, due to the unusual population make up, we can expect to see 7,000 fewer residents by 2031 as a result of natural change. This will release a number of homes towards meeting natural change needs locally. Added to this will be the supply of planning consents and land allocations not yet taken up. The Forum is concerned that seeking to reference future housing provision on past building rates does not meet an objective assessment of need and ability to supply as required by the NPPF.

3) Why only a 30% affordable homes contribution ?

There are 2,400 residents currently in need of affordable homes on Torbay's waiting list. Seeking only a 30% contribution of affordable homes on sites of more than 15 dwellings has not been shown will achieve the desired outcome. As developers become more involved with difficult sites and associated costs they will seek to be released from the requirement on grounds of viability. We have already seen this happening with significantly discounted rates being sought and accepted by the Council in relation to current major developments. A higher percentage for the larger sites is required.

The schedule attached has a balance of responses containing 25 objections and 36 comments in support, plus 2 important observations at the end.

For the avoidance of doubt, it remains the Forum's prime objective to produce a Neighbourhood Plan for Paignton in accordance with the timetable and arrangements previously agreed for a new Local Plan and proposed adjacent Neighbourhood Plans. As you will recall, it has been the recommendation of the Princes Foundation from June this year that there needs to be further dialogue between the community and the council in relation to the rationale for the size and period of growth and to progress this through the Local Plan process.

Hopefully the attached schedule is self explanatory, but please let me know if any further clarification is required.

Yours sincerely

David Watts
Chairman, Paignton Neighbourhood Plan Forum

cc. Mike Parkes, Forum Secretary, Cllr David Thomas, Deputy Mayor & Executive Lead.