

# PAIGNTON NEIGHBOURHOOD FORUM

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



c/o 34 Totnes Road  
Paignton  
TQ4 5JZ

30 December 2015

By email to: [Future.Planning@torbay.gov.uk](mailto:Future.Planning@torbay.gov.uk)  
FAO David Pickhaver  
Torbay Council  
Future Planning & Transport  
2<sup>nd</sup> Floor, Electric House  
Castle Circus  
Torquay  
TQ1 3DR

Dear David

## **Collaton St Mary Masterplan: Additional Consultation on Access Arrangements**

1. As requested, these are the views of the Neighbourhood Plan Forum following consideration of the five options received from the Council and considered at the Forum meeting on 17 December 2015.

2. Before providing more detailed comments, the Forum has an overall concern that the consultation has been too limited and does not include key information on the following issues of relevance to the highway options proposed. In particular;

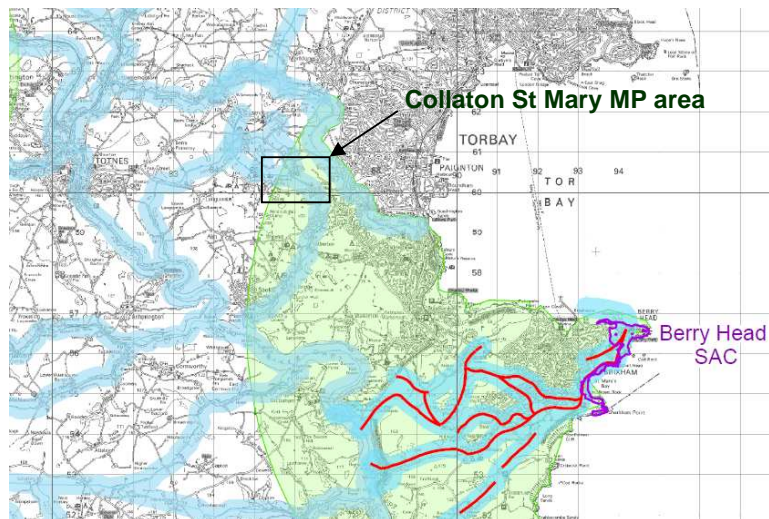
a) No information has been provided about existing traffic flow, how much extra traffic is likely to be generated at the alternative access positions shown, and the space that would be required in broad terms to accommodate such significant change. The A385 is the key strategic route into and out of the west side of Paignton and Torbay overall. Additionally it has visual identity of tourist appeal. At this important planning stage the Forum is concerned at the view in the consultation that information about traffic flow will not be provided until any planning applications might be received. This is very unsatisfactory.

b) No information has been provided that shows how foul water sewerage and surface water drainage problems in the area will be affected by the options presented. It appears to be assumed that the development and highway routes will not add to existing problems and would resolve both foul water and surface water flooding that currently occurs. It is not that simple as most of the development shown is located in low lying areas where adverse connection and capacity constraints exist (see further below).

c) No information has been provided on protected species in the area in terms of any surveys undertaken or deliverability of mitigation works seemingly being assumed in relation to the indicated development area and in combination with other areas nearby affected by development proposals. This omission conflicts with the new Local Plan.

3. It is the view of the Forum that the consultation period should be extended beyond 8 January 2016 to enable the Council to provide the missing information.

4. On the basis of the limited information currently provided, the Forum has nevertheless attempted an assessment and has the following more detailed comments:
5. As requested, each option has been assessed against the other 4 presented. However, the problem with such an approach is that it assumes the options are able to resolve the problems which are at last starting to be recognised exist (see further below).
6. In the absence of necessary habitat information, regard has been given by the Forum to the South Hams Special Area of Conservation map (see below) that shows the protected flyway (in blue) crossing the proposed development area, and sustenance zone (in green) that includes most of the area the consultation assumes for development.



Source: Natural England - South Hams SAC map

7. In the absence of traffic flow information, regard has been given to the scale and distribution of development illustrated in the consultation maps as summarised in **Appendix 1** attached herewith. A summary of the key features the Forum has noted in respect of each option received is shown in **Appendix 2** attached. The blue line shown in Appendix 2 is the centre line of the bat flyway, the red lines are the highway proposals considered.
8. The conclusions reached, comparing one option with another, are summarised in the table below:

#### Comparative Ranking of Options 1 to 5

	1 Original	2 No Meadow Link	3 SR diverted west	4 SR diverted east	5 Option 4 & Meadow link
Habitat	2	1	5	3	4
A385 role	1	4	2	3	5
Accessibility	5	4	3	2	1
Stoke Rd	5	4	3	1	2
Flooding	?	?	?	?	?
Cohesion	1	2	3	4	5
Viability	1	2	4	3	5
	15 ?	17 ?	20 ?	16 ?	22 ?

Key: Adverse Impact (1 lowest / 5 highest)

9. In the absence of any further information, the conclusion reached is that, of the 5 Options, Option 1 appears to have the least adverse impact. However, the Forum is concerned that by limiting the consultation only to highway access matters, a number of important aspects are being missed. They include the following, but are not exhaustive.

10. To propose development on both sides of the A385 is not sustainable planning and relegates the community to being split even more by a major 'A' road artery in a piecemeal manner that perpetuates the sporadic pattern of development of the past, specifically in respect of Areas D and E shown in Appendix 1.

11. There is no evidence that account has been taken of the space that will be required to accommodate sustainable drainage solutions to cope with the significant amount of surface water that will arise from the additional development and diversion of existing flows. It is only necessary to compare the field space that was required for 170 dwellings in the aborted planning appeal in 2014 that affected Area E to see how extensive the sterilised land requirement would need to be.

12. The Forum is concerned that inadequate regard is being given to the significant flooding that occurs on the meadow periodically as shown in the photograph below. The Council will be aware that flooding currently taking place in Carlisle and York has caused the government to agree that a radical re-think of building in such areas now needs fundamental review. Exactly the same issue applies at Collaton St Mary.



**The meadow in flood looking northward**

13. As all 5 Options can reasonably be expected to affect this flood plain, it is the Forum's view that it is not acceptable to brush over the issue and leave it to piecemeal assessment when future planning applications are submitted. A comprehensive assessment and infrastructure delivery plan are required.



14. When viewed from the air it is also clear that the historical reason why Stoke Road takes the path that it does to Totnes Road is to avoid the flooding meadow. Similarly, the reason why the Bat flyway takes the course that it does relates directly to the line of the water course that runs through the centre of the meadow as shown below.



**The meadow and stream looking northward with Stoke Road on the right**

15. The overall conclusion reached by the Forum is that it is not possible to evaluate the options any more meaningfully in the absence of

- a) Habitat Regulation Assessment for the whole area (including 'in combination')
- b) Flooding issues that exist (Foul water & Surface water impact)
- c) Traffic flow impact on the A385 role in terms of traffic flow and visual impact

16. Overall the Forum has concern that in the absence of the above information, the scale and pace of expansion indicated will not be able to secure sustainable development as required by the NPPF, and which the Local Plan Inspector noted in his report of 12 October 2015 has not yet been resolved in respect of the Collaton St Mary area.

17. On a positive note, the Forum has found the consultation has helped to inform the Neighbourhood Plan making currently underway and being progressed with Council officers as previously agreed. The conclusions reached are however that the infrastructure engineering requirement, protected habitat impact, and cost viability implications are much more significant than has hitherto been recognised.

Yours sincerely

David Watts

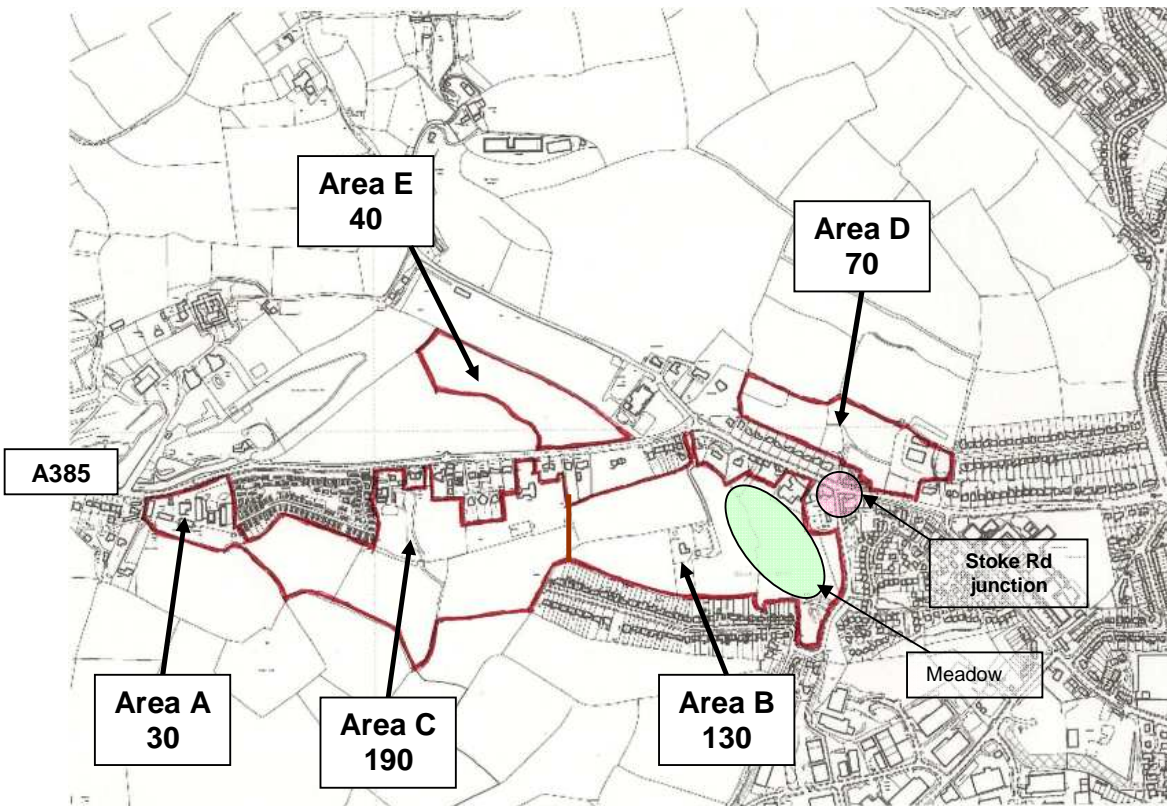
Chairman, Paignton Neighbourhood Plan Forum

Enclosures: Appendix 1: Collaton St Mary Area (assumed development numbers)  
Appendix 2: The highway access options summarised

Copied to:

Elected Mayor Oliver and all Torbay Councillors;  
Peter Fenwick (Stoke Gabriel Parish Council)  
Denise Ramsey and Julien Sclater (Natural England)  
Martin Dunn (South West Water)  
Ian Hooper (Environment Agency)  
Mike Parkes (Forum Secretary);

## Appendix 1 - Collaton St Mary Area



**Source:** Council Draft Masterplan Highway Access consultation drawings December 2015

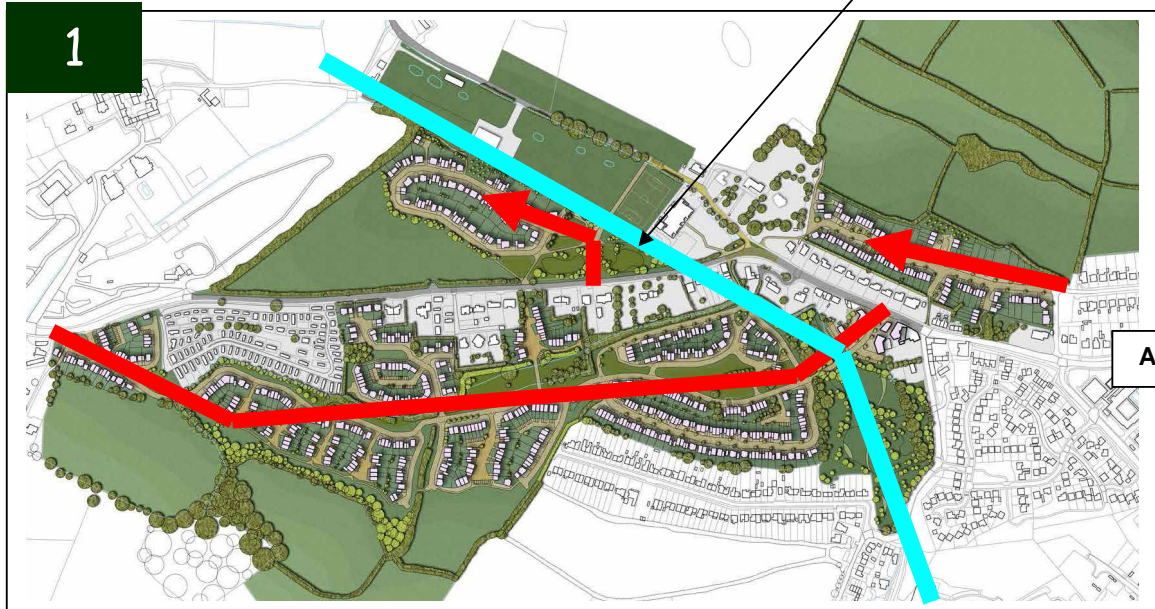
Area A:	30
Area B:	130
Area C:	190
Area D:	70
Area E:	40
Total:	<u>460</u>



## Appendix 2: The highway access options summarised

### Option 1 – As previous Draft Masterplan

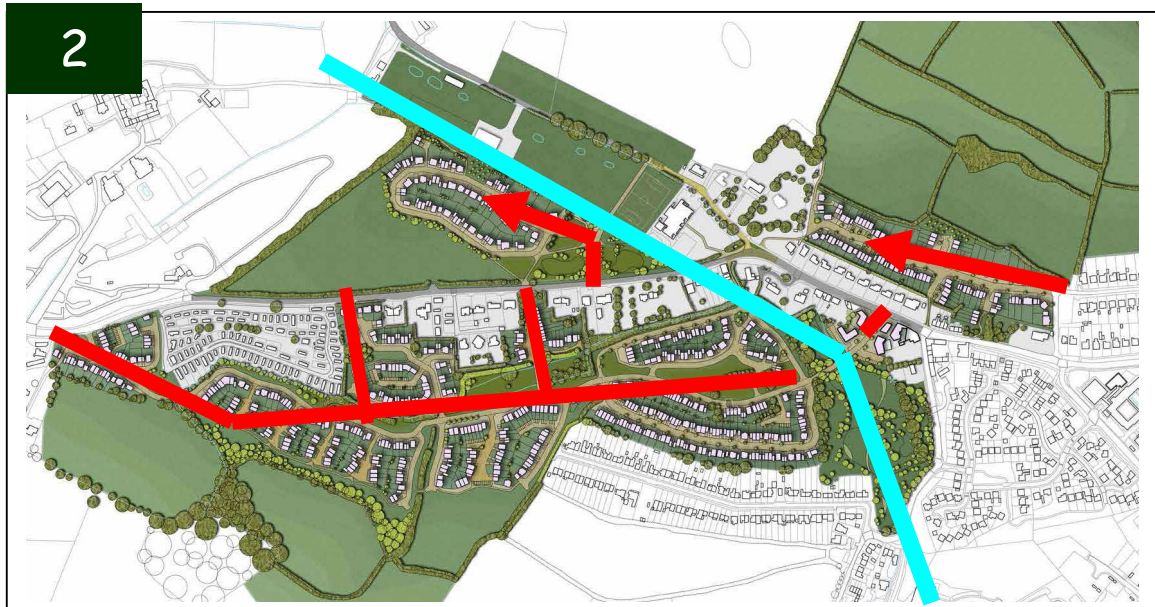
Route of stream and protected bat flyway



**Advantages:** Simple layout

**Disadvantages:** Conflict with Stoke Road junction & protected Greater Horseshoe Bats

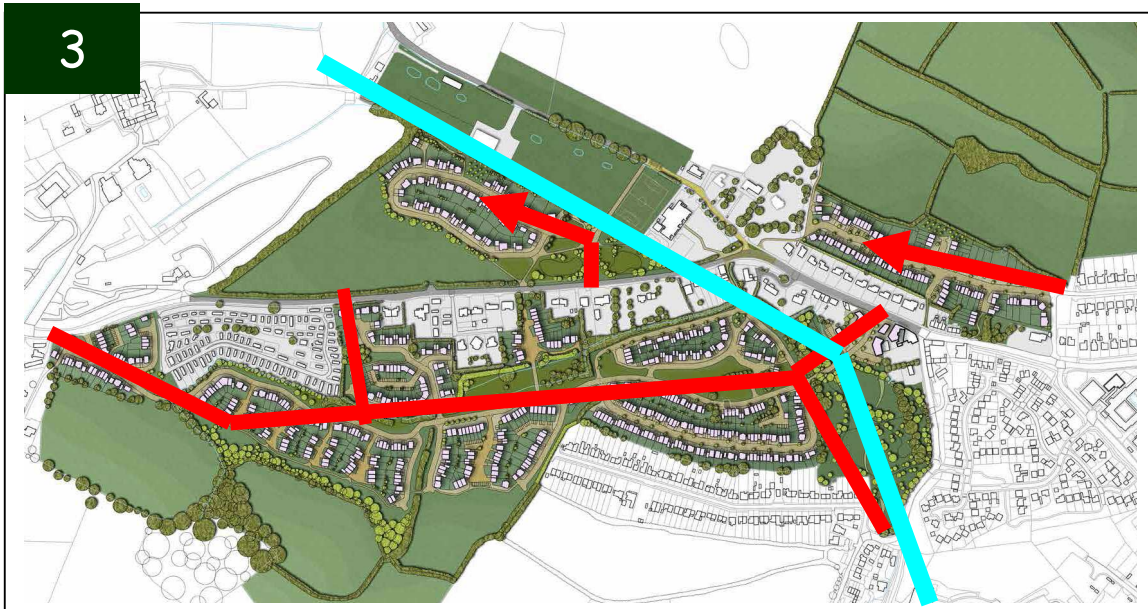
### Option 2 – No link across meadow



**Advantages:** Bat conflict removed (?) / more access to A385

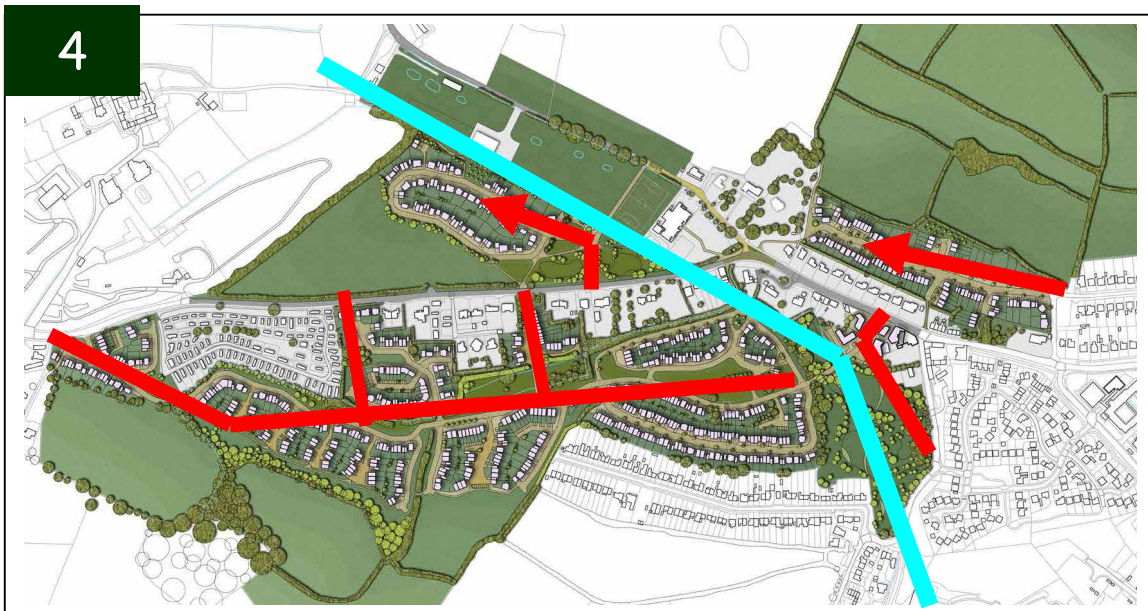
**Disadvantages:** Only one access east / Stoke Road conflict remains

**Option 3 – Stoke Road diverted west side of meadow**



**Advantages:** Stoke Road conflict removed / extra access to A385  
**Disadvantages:** Conflict with bat flyway / diversion cost

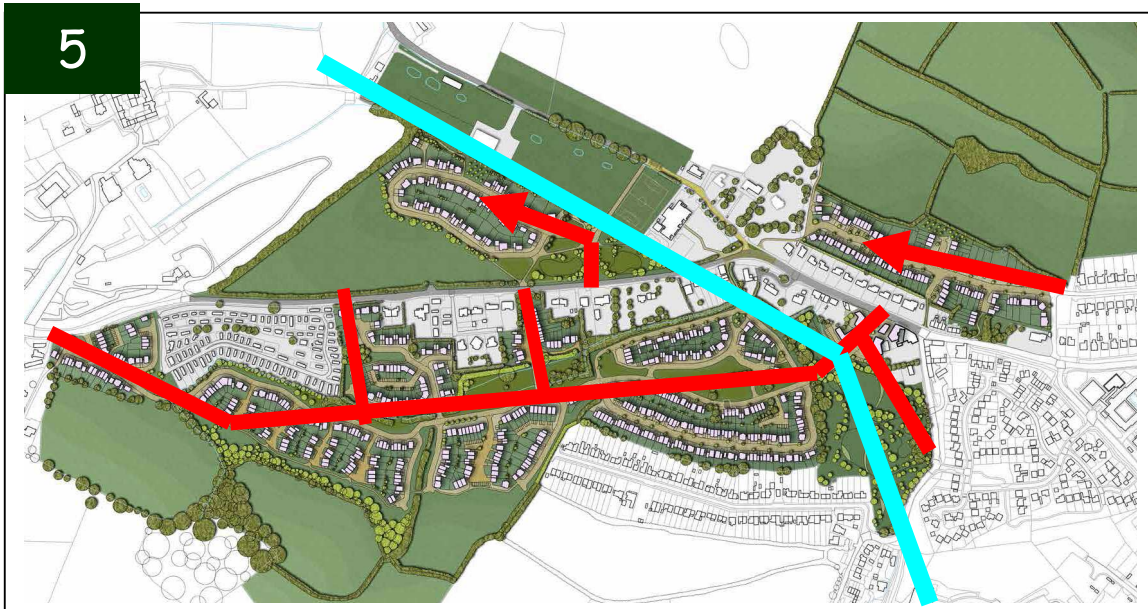
**Option 4 – Stoke Road diverted east side of meadow**



**Advantages:** Bat conflict removed (?) / more access to A385  
**Disadvantages:** Only one access east / diversion cost



**Option 5** – Stoke Road diverted east side of meadow with link across meadow



**Advantages:** Stoke Road conflict removed / extra access onto A385

**Disadvantages:** Conflict with bat flyway / diversion cost / traffic impact on new centre