

# PAIGNTON NEIGHBOURHOOD FORUM

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



c/o 34 Totnes Road  
Paignton  
TQ4 5JZ

2 September 2019

By email to: [planning@torbay.gov.uk](mailto:planning@torbay.gov.uk)  
Torbay Council  
Planning Department (FAO Mr Scott Jones)  
Tor Hill House  
Castle Circus  
Torquay  
TQ2 5QW

Dear Mr Jones

**Planning Application P/2019/0615: Outline proposal for redevelopment of Torbay Holiday Motel and Beechdown Court apartments for up to 70 residential dwellings with all matters reserved except access, Totnes Road, Collaton St.Mary, Paignton TQ4 7PP.**

Thank you for consulting the Forum for views by no later than 2 September 2019.

The Forum has noted that after four years of consideration the previous application for 33 dwellings has been withdrawn as shown by letter dated 26 March 2019 on the application file (P/2015/0709).

This latest application by a new applicant, and again speculative, has not addressed the previous concerns raised. The Forum has nevertheless considered the latest proposal afresh. Whilst recognising the existing use is suitable for redevelopment the proposal for up to 70 dwellings constitutes

- a departure from the approved development plan and
- chronic over development

The Forum has come to this conclusion for the following reasons:

## **1 - Departure from the approved development plan**

The Paignton Neighbourhood Plan was approved by the Council on 15 November 2018, approved by Referendum vote on 2 May 2019 and adopted by the Council on 19 June 2019.

The site lies within the boundary of **Policy PNP1(a)** (Rural Character Area), **Policy PNP19** (Safeguarding open Countryside) and **Policy PNP24** (Collaton St Mary Village):

**Policy PNP1(a)** (Rural Character Area): at criteria e) makes clear the need within the RCA to implement the management strategy of Policy PNP19.

**Policy PNP19** (Safeguarding open countryside): shows the site is situated within Sub area 1L on page 63. The management strategy for this part of the RCA as shown in Table 6.2 is to restore the landscape character relationship between the rural and urban area.

The proposal conflicts directly with the policy as it would result in a further reduction of landscape features by their removal and replacement with a dense urban scheme and lack of compensating landscaping contrary to the purpose of the adopted policy.

**Policy PNP24** (Collaton St Mary Village): expressly states that any further development proposals will only be supported where they are in accordance with the adopted Masterplan for the area.

The adopted Masterplan for Collaton St Mary shows the site as the key location for creating a gentle introduction to the village entrance point from the west through retention of landscaping, provision of amenity space, and a set back housing layout. This is completely ignored by the proposal submitted. The very clear information provided in the adopted development plan shows how the Policies are expected to be addressed.

In sharp contrast the proposal will result in nearly double the number of dwellings proposed in the adopted plan. The abrupt 'wall' of buildings proposed on the Totnes Road frontage fails to reflect in any way the character of interplay between buildings and spaces that characterise the landscape and village identity and approved policy to restore the relationship between the natural and built environments at this location.

The combined effect results in the proposal being a clear departure from the development plan for the area.

## **2 – Chronic overdevelopment**

The proposal also conflicts directly with the following policies of the adopted development plan

### a) Local Plan

**Policy SS2** – as no area wide bespoke Greater Horseshoe mitigation plan has been provided;

**Policy SS7** – as inadequate access and drainage infrastructure has been provided;

**Policy SS8** – as insufficient evidence of protection to habitat has been provided;

**Policy SS9** – as no provision has been made for high quality green space at the local level;

**Policy SDP3** – as there is no accompanying upgrade to the A385

**Policy TA1** – as the access proposed will not 'improve road safety'

**Policy TA2** - as inadequate provision is made for access to / egress from Beechdown Park

**Policy C1** – as the proposal is 'urban sprawl' and not of 'modest scale';

**Policy C4** – as the proposal adversely affects features of significant landscape value;

**Policy NC1** – as inadequate information is provide that 'conserves and enhances' biodiversity;

**Policy DE1** – as the design will adversely affect the natural and built environment character;

**Policy DE3** – as the layout will deliver a poor quality of amenity for future residents;

**Policy DE4** – as 3 story housing along Totnes Road is out of keeping;

**Policy ER1** – as the information submitted fails to demonstrate no flood risk will result;

**Policy ER2** – as surface water to existing water courses will cause harm downstream;

**Policy W5** – as there is inadequate capacity locally to accept further foul water disposal.

### b) Neighbourhood Plan

In addition to conflicting with Policies PNP1(a), PNP19 and PNP24, the proposal fails to accord with the following:

**PNP1 (criteria f)** – as the tree loss will result in adverse impact on protected species;

**PNP1 (criteria iv)** – as inadequate provision is made for foul and surface water drainage;

**PNP1 (c) (criteria 1, 2 and 3)** – as local identity, biodiversity and treescape will be damaged;

**PNP1(d) (criteria iii & iv)** – as there is inadequate space left for bin and cycle storage;

**PNP1(f) (criteria iii)** – as there is a lack of soft landscaped areas for natural drainage;  
**PNP1(i)** – as there is totally inadequate provision made for surface water disposal

**In conclusion**

There are no benefits that outweigh the harm that would be caused by such a chronic example of overdevelopment.

Applying conditions or deferment for minor amendment would not overcome the depth and breadth of problems with the submitted proposal.

Refusal of the application is justified without further delay.

Yours sincerely

*David Watts*

Chairman, Paignton Neighbourhood Plan Forum