

Forward Planning Team
Torbay Council.

Via email: Future.Planning@torbay.gov.uk

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Dear Forward Planning Team,

TORBAY LOCAL PLAN – REGULATION 19 CONSULTATION

Thank you for the notification of the publication of the consultation draft Torbay Local Plan.

National Highway's Responsibilities

We are responsible for the safety, reliability, and operational efficiency of the Strategic Road Network (SRN). In the case of Torbay, this mainly comprises consideration of impact on the A38 and M5.

Policy

The government policy for the SRN is the Department for Transport (DfT) Circular 01/2022: Strategic road network and the delivery of sustainable development (December 2022): <https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development/strategic-road-network-and-the-delivery-of-sustainable-development>. The Circular should be read alongside the National Planning Policy Framework (NPPF) as the relevant national policy for the SRN.

The Circular includes policy on plan-making that may affect the SRN. It stresses the importance of a vision-led approach to development, which also features in the NPPF. The vision-led approach is focused on managing down the traffic impacts of developments by maximising opportunities for sustainable and active travel and the internalisation of movements where possible. To assist you with meeting this policy, we recommend that you utilise the DfT Connectivity Tool to assess the sustainability credentials of potential development allocations: <https://www.gov.uk/guidance/connectivity-tool>

Comments on the Draft Local Plan.

Vision and Scope

Strategic Policy TAS: 'Transport Vision and Hierarchy' sets out the plans vision-led approach to transport and place-making. 'Development proposals will be supported where they apply a vision-led approach to transport and place-making, contributing to the achievement of the Transport Vision, providing high quality, safe, healthy and accessible places'. This is welcome.

Housing and Employment Targets

The scale of the growth included in the plan is modest; the plan allows for a total of 8,000 homes and 80,000 sq m of employment space over a 20 year period between 2025 and 2045. This equates to 400 homes per year on average which represents an approximately 12% increase in housing stock. However, it is noted that this is less than half of the Local Housing Need derived using the Governments standard method.

If, at Examination, an increase in the housing provision is considered, e.g. double the proposed housing targets, this would trigger a need for a more detailed assessment of the impact on the role and function of the SRN. See NH's current position on likely impact on the SRN, below.

We accept that it is reasonable to assume that in broad terms, travel demand within Torbay District would increase proportionately with population growth but the ageing population coupled with the strategic priorities relevant to travel should result in peak period travel demand being slightly less than this. Further afield, the effect of growth in Torbay district on traffic growth would diminish with distance. Census travel to work patterns suggest that less than 20% of travel to work trips would be to Exeter/Plymouth.

Strategic Priorities

Strategic Priority 3 relates to transport and connectivity. Encouraging active travel, providing mode choice and reducing/minimising the need to travel and necessary journey length through detailed planning, broadband connectivity, are all welcome.

We also acknowledge that the plan accepts that a review will be required five years from adoption.

Likely implications for the SRN

In terms of likely implications for the SRN (A38), Torbay's travel-to-work area includes Exeter and to a lesser extent, Plymouth. This suggests possible implications for increased traffic flows at Splatford (A38/A380), Marley Head (A38/A385) and Goodstone Cross (A38/A383).

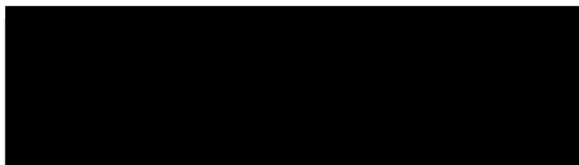
While there is little analysis of this impact, the likely low levels of growth in travel demand on the SRN associated with the local plan, National Highways is content that any implications for the operation of the SRN would be indistinguishable from background growth. Traffic growth on the A38 is expected (by DfT) to be between 10 and 15% over the period covered by the plan. This would be mainly due to background growth (growth not in Torbay).

Continuous Engagement

We are happy to work with you on a continuous basis throughout plan preparation, including, if appropriate a Statement of Common Ground for the Examination.

I shall act as your main point of contact for the Local Plan process and would be grateful if all correspondence with National Highways central email be copied to me in order to best facilitate assistance.

Yours sincerely

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Steve Havers

South West Operations - Planning & Development

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