

Torbay Local Plan Housing Growth Options Consultation (October-December 2022) . Feedback on Consultation Responses. (Amended November 2023)

1 Summary

- 1.1 This briefing note summarises feedback received on the Local Plan Housing Site Options Consultation, which ran from 28th October 2022 to 5th December 2022. This was carried out under Regulation 18 “issues and options” of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 **November 2023 Update:** Please note that following the May 2023 Council Elections, the new Administration has asked Officers to reassess the 2020 Review of the Local Plan 2012-30, to consider whether the 2020 review of the Local Plan remains applicable, in the face of subsequent global, national, and local events. And particularly to look at the Local Plan’s tandem approach to providing jobs and homes. It is emphasised for the avoidance of doubt, that the draft Local Plan Housing Site Options document (i.e. the subject to this consultation response) has no status in decision making. This applies especially to additional greenfield housing sites recommended in the Housing Site Options Consultation. The development plan in Torbay continues as of November 2023 to be the Adopted Torbay Local Plan 2012-30 (adopted December 2015) and the” Neighbourhood Plans for Torquay, Paignton and Brixham Peninsula, which were “made” (i.e. Adopted) in June 2019. Further updates will be provided at [The local plan update: a landscape to thrive - Torbay Council](#).
- 1.3 This analysis of representations on the October 2022 consultation is provided for information purposes. The council will consider the representations made carefully in its Local Plan making work.

The Local Plan Housing Site Options Consultation- detailed feedback

- 1.4 The Site Options consultation followed a more generalised “Growth Options” consultation in January-February 2022. The latest consultation recommended detailed housing policies and site allocations, as well as proposing a housing growth trajectory of 300 dwellings a year.
- 1.5 The consultation received more than 6,340 visitors to <https://yoursay.torbay.gov.uk/local-plan-update>. 3,121 visitors showed a deeper level of engagement (e.g. downloaded documents). There were 178 detailed survey responses, and 383 “pins” on the housing proposal map from 162 contributors. In addition, there were 329 additional representations made by email and letters received. The council consulted on the draft Housing Strategy at the same time as the Local Plan, and about 57% of responses to that consultation appear to be relevant to planning policy. This is lower than the previous Regulation Consultation, which received a total of 1510 representations (although there may have been some overlap between the “long” and “short” survey responses). The previous consultation responses are still relevant.
- 1.6 The council sought to encourage Local Plan consultation responses from a wider section of the community including younger people, faith groups and people in housing need. A wider spread of ages did respond, with over half of survey responses received from people aged below 65. However, the vast majority of responses by number were objections to specific greenfield sites, and exhortations for the council to make to most of brownfield sites. There was also concern about local infrastructure, such as surgeries and highway capacity. There was general sympathy for the need for affordable housing; but there was concern that new homes would not be affordable for local people.
- 1.7 The greenfield sites that received the most objections were:

- Broadley Drive/Broadpark Road, Livermead (220 objections, plus 7 “pinned” objections)
- Sladnor Park, Maidencombe (4 detailed objections plus 25 “pinned” objections)
- Land north of Bottompark Lane, between Scotts Bridge, Barton and Barton Hill Road, Torquay (40 objections plus “18 pinned” objections – some objections relate to both sites in the area).
- Land at Preston Park, Sandringham Gardens.106 objections, plus 81 “pinned objections” (Some representations may also relate to Occombe Farm/Preston Down Road).

1.8 The Local Plan Site Options Consultation contained an interactive map, that invited people to “pin” comments to the map. A full list of sites is included in Appendix 2 below. The “pinned” sites are as follows:

<u>Site</u>	Number of pins
	Not suitable
Strongest opposition to the following sites:	
Sandringham Gardens (West of Preston Down Road) (H2P01)	81
Sladnor Park (H2T01)	25
Preston Down Road North (H2P02 and H2P03)	16
Land North of Bottompark Lane (H2T05)	12
Land adjacent to Broadley Drive, Livermead (H2T09)	7
Former Living Coasts, Beacon Hill (TCRT18)	7
Land at Kingskerswell Road (Kingskerswell Fields A & B) (H2T03)	6
The Marina Car Park (TCRT17)	4
Land at Hamelin Way and Moles Lane (Edginswell) (SDT3a*) (Principle established)	4
Yalberton Holiday Park/Berry Acres ‘Link’ (SDP4a)	4
The sites with the most pinned “support”:	Suitable or may be suitable
Hollicombe Gas Works	12
Grand Hotel Garage Site (H2T08)	4
Babbacombe Business Park (H2T04)	4
Archery Field, Dartmouth Road (H2BCG02)	4
New sites raised for consideration	Suitable or may be suitable

Land between Brim Hill and Rockhouse Lane, Maidencombe Village, Torquay	7
Former Torquay Probation Office, Thurlow House, 35 Thurlow Road, Torquay	3
Torbay Trading Estate, New Road, Brixham	3
Former 'The Original Factory Shop' premises, Palace Avenue, Paignton	2
Various sites around Longpark Hill, Maidencombe	1
Land North of Brunel Lodge and West of Teignmouth Road, Torquay	1
Torquay Golf Club	1
Torquay United Stadium in Plainmoor	1
Quarry House Vets, 148 Teignmouth Road, Torquay	1
Former Elektron Technology premises, Woodland Road, Torquay	1
Former 'Jack Sears House Residential Care Home', Dartmouth Road, Paignton	1
Land between Lancaster Drive and Fairlawns Park	1

- 1.9 A common theme in responses was that the council should be making the most of brownfield sites such as the town centres or Hollicombe. Sites identified were largely ones that the council is aware of and were assessed in the Housing and Economic Land Availability Assessment. On the one hand the Local Plan consultation is very clear that brownfield regeneration is already the main thrust of the Local Plan. However, proposed changes to NPPF and the government's Long Term Plan for Housing, may make it easier for the Local Plan to prioritise brownfield sites and be more bullish about sites where deliverability is less clear (e.g. Bancourt Hotel, Avenue Road, or Torre Station Yard). The Local Plan Housing Site Options avoided proposing sites or buildings with an active employment use for housing. The TDA and neighbours have raised concerns about the shortage of employment land, and there is a policy tension between maximising housing delivery and protecting employment land. However, in the light of representations made, there is a case to allocate and safeguard specific employment sites for "employment" uses (Class E(g), B1 and B2).
- 1.10 There were more detailed responses from some housebuilders and the HBF. As would be expected, these argued against deviating from the Standard Method Local Housing Need figure and pointed out that reduced housing levels would make the affordable housing shortfall worse. Some of these representations also pointed out constraints and viability limitations with sites such as Hollicombe and Edginswell. As noted in the previous consultation, the strongest development pressure is in the south of Torbay (i.e. the BCG Forum area and Brixham). The 1st and 18th holes and clubhouse of Churston Golf Club was also promoted for development at this consultation.
- 1.11 The developers of Sladnor Park, Yalberton (Long Road) and additional sites at White Rock confirmed their willingness to develop these sites, albeit with detailed comments and specific

concerns. Foremost among the concerns from the development industry was the proposal to locate traveller sites as part of Future Growth Areas.

- 1.12 Conversely, environmental bodies, such as Natural England, RSPB and Devon Wildlife Trust made comments relating to Torbay's environmental limits including (but not limited to) biodiversity net gain, South Hams SAC, the Marine SAC, curlew buntings and agricultural land. The difficulties of allocating further greenfield sites without clearly setting out mitigation or compensatory land was highlighted. The RSPB identified this as an issue for existing allocations as well as proposed new ones. It was argued that the Local Plan needs to avoid environmental harm, rather than seeking to mitigate or compensate for it.
- 1.13 Detailed responses were received from neighbour authorities (Teignbridge, Mid Devon, Exeter, East Devon and Plymouth/South Hams/ West Devon Joint Local Plan area). One reason for this is because Torbay has indicated that it is unable to meet the government's housing standard method local housing need figure of 600+ dwellings a year, without causing severe environmental damage. This will be an important consideration under the current "Duty to Cooperate" affecting all areas' local plans. Unsurprisingly our neighbours remain sceptical of the need to accommodate Torbay's housing, and indicate that we should do all that we can to meet needs within Torbay. They have asked for further evidence that Torbay is unable to accommodate its needs. They have also asked for clarification about the likely scale of unmet need. One reason to seek to challenge the standard method is that it may reduce unmet need passed to neighbours.
- 1.14 It is noted that the Plymouth JLP authorities and Totnes Town Council have raised concerns about development on the West of Paignton including at Collaton St Mary and the landscape and air quality impact on South Hams. Neighbour authorities (particularly Plymouth JLP and Teignbridge) are supportive of the council challenging the "Standard Method Local Housing Need" figure. It is argued that this should be based on 2021 Census based data and use long term migration patterns, rather than continue to use the 2014 based Sub-National Household Projections. However, such data will not be available from ONS until 2025.
- 1.15 Neighbour authorities also made more detailed comments including the need for traveller accommodation, the strategic gap between districts, and the allocation of employment land (i.e. suggesting that the Local Plan should allocate specific employment sites rather than rely on mixed use allocations).
- 1.16 Despite the above, Torbay has a constructive working relationship with neighbours and will be carrying out further Duty to Cooperate meetings with them as the plan progresses. Although the "Duty to Cooperate" may be abolished under the Levelling Up Act, it is likely to remain in force for some time and will be replaced by a similar "Alignment" test (as yet not fully defined).

Other issues arising from the consultation.

- 1.17 The consultation was also about other housing policies and priorities, and survey responses are summarised in Section 4 below. Healthcare was raised as the most pressing infrastructure need, followed by affordable housing and road infrastructure. There was strong support for a "primary occupancy policy" to restrict new housing being used as second or holiday homes. Overwhelmingly, survey responses felt that the Local Plan should retain local development management policies (rather than relying just on national documents). However, the Levelling Up and regeneration Act proposes to replace generic development management policies with a National Development Management Framework.
- 1.18 The NHS and Devon and Cornwall Police made representations highlighting infrastructure shortfalls and seeking developer contributions for their services.
- 1.19 Torquay United's aspiration for a new stadium and youth training facility was raised as part of the consultation. This could free up Plainmoor as a sustainable urban redevelopment site; but finding a suitable alternative location for a stadium is likely to be challenging.

2.0 Housing Strategy

- 2.1 The council twin-tracked the Housing Strategy with the Local Plan, in order to seek views from people who may be in housing need. 292 responses were received. 71% agreed with the need to increase housing supply are relevant to the Local Plan, and relate to the need to increase the supply of affordable housing. Despite a high turnout of homeowners (74% of responders were home owners, and 79% of responders were aged 45+), many said that the Council should focus on housing for local people, and understood the need for affordable housing. Many claimed that developers were courting out of town buyers with 'luxury homes' but these were outside of local wages. No one advocated for greenfield development, with 25% wanting to explore empty homes, second homes and brownfield. Infrastructure shortfalls, including health and transport were identified by 7% of responses. A more detailed breakdown is attached at Appendix 4.
- 2.2 These responses are broadly consistent with the Local Plan consultation, with more Engagement survey responses, but a lower overall level of response. However, a learning point may be that a shorter, simpler survey focussing on closed questions may get a higher response rate.

3.0 Comparisons with other Consultations

- 3.1 Members asked for a comparison of the numbers of representations received. As noted above, the Local Plan Site Options Consultation received responses from about 600 responders (although there may be an overlap between completed questionnaires and map-pinned comments. This is less than made comments in the January-March 2022 consultation. However, the responses made to the earlier consultation are still relevant.
- 3.2 Recent Engagement HQ responses are as follows.

	Visits to survey page	Surveys Completed
Local Plan Housing Site Options	8,600	178 plus 383 map pins from 162 contributors. 329 separate letters and emails.
Housing Strategy	1,100	189
Torquay Neighbourhood Forum redesignation	289	25
Improvements to Torquay Town Centre	2900	132
Climate Action Plan	1200	141

- 3.3 By way of comparison, Teignbridge District Council has carried out 4 stages of "Regulation 18" consultations, with a total of 7,308 responses. [consultation-statement-main-report.pdf](#) (teignbridge.gov.uk) These are as follows:

- Issue Paper: May-July 2018: 267
- Part 1 Development Management Policies: March-July 2018 (1): 476
- Part 2 Site Options Policies (2): June- August 2021: 5,030

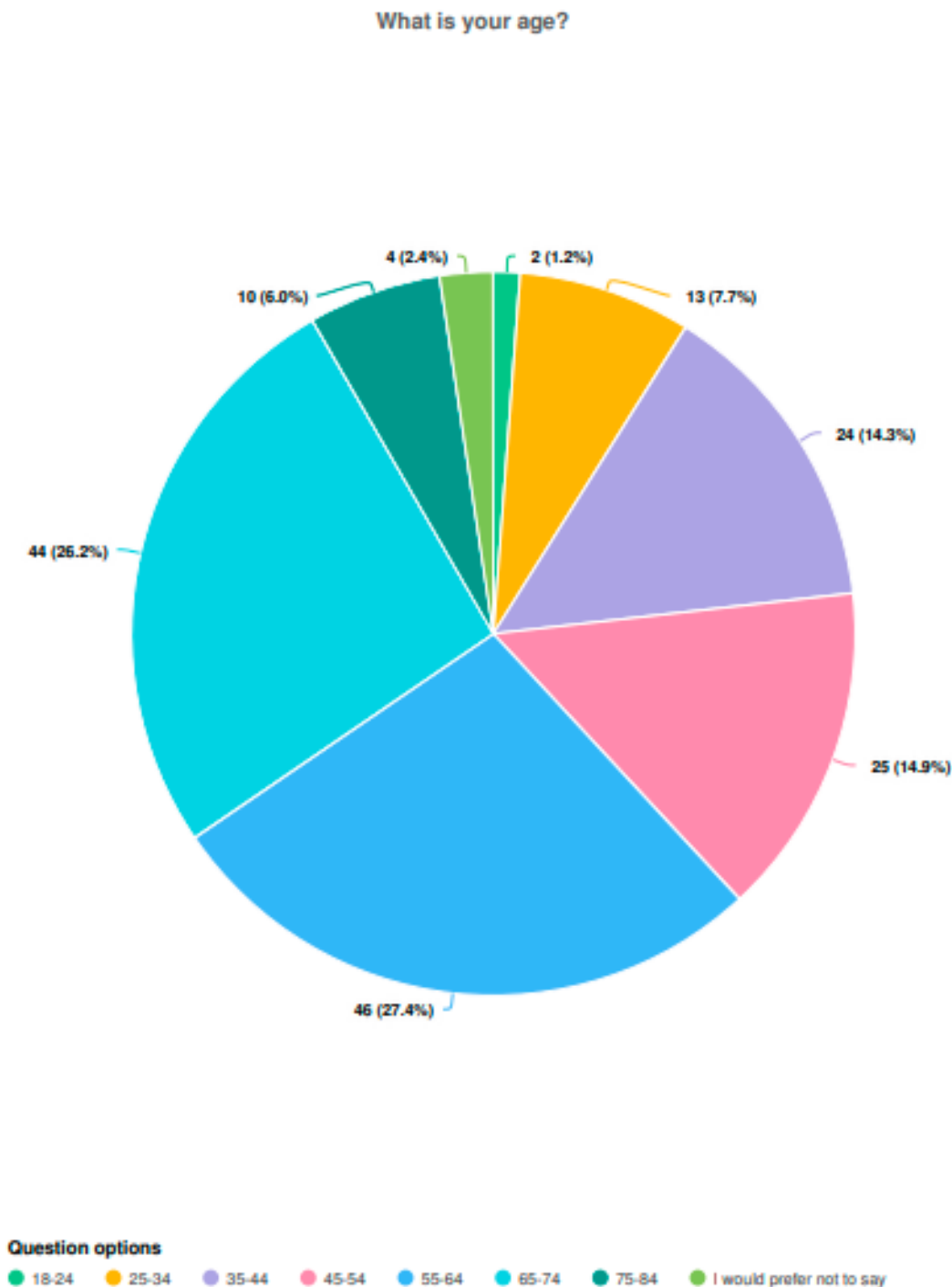
- Part 3 (Renewable Energy, Gypsy and Travellers, small residential sites) 1,535.

It will be noted that the highest level of comment from Teignbridge was from the specific sites consultation, whereas the generalised consultation responses are comparable with Torbay. Also, that Teignbridge has undergone four rounds of consultation, compared to two (at present) in Torbay.

- 3.4 **Exeter City Council's** Regulation 18 Issues Consultation (September-November 2021) received a total of 215 responders. Their September-December 2022 draft consultation document had around 1,700 responders (making up about 4,000 individual comments). There was general support for proposals, with the most objections coming from small site and greenfield proposals in Topsham. A break down of how many objections/support were received is not, at the time of writing, available.

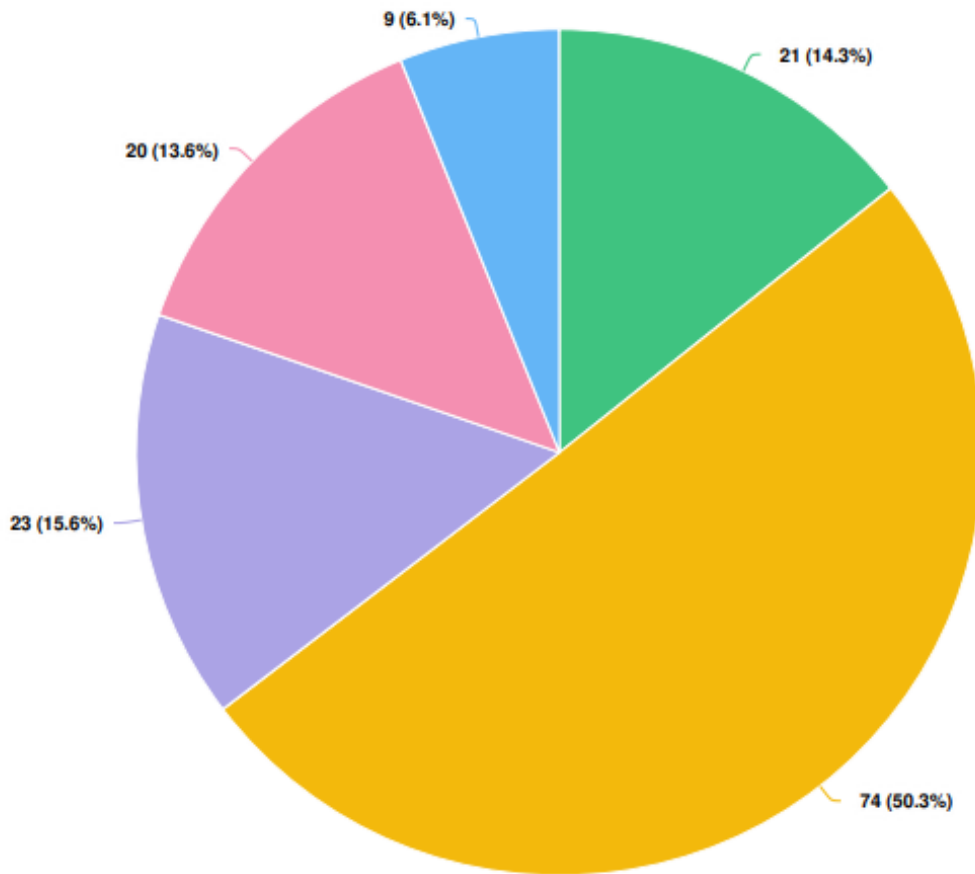
Appendix 1 Survey Issues in the Local Plan Consultation

A1.1 This section summarises the key questionnaire responses that were not site-specific. These only capture the views of the 172 detailed survey responses, rather than everyone who made representations. The recent consultation received responses from a much wider age range than the January Growth Options consultation. Over 94% of responses were representing private views.



A1.2 65% of respondents agreed or strongly agreed that the Local Plan's aspirations remained appropriate.

Are the Local Plan's Aspirations still appropriate?

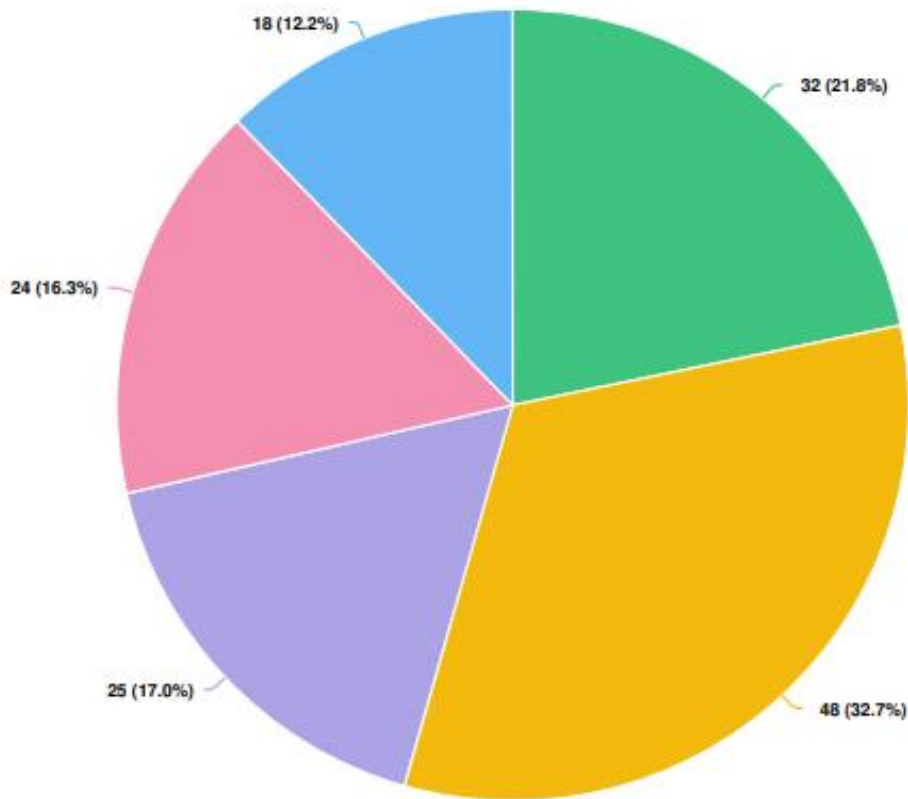


Question options

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

A1.3 Just over half of respondents agreed or strongly agreed that responding to climate change should be the Local Plan's top priority, although 28% disagreed or strongly disagreed.

While the order of the five aspirations is not intended to imply their level of importance, we intend to move 'Respond to climate change' to Aspiration 1 as this is an overarching aspiration for the Local Plan Update. Do you agree with this?

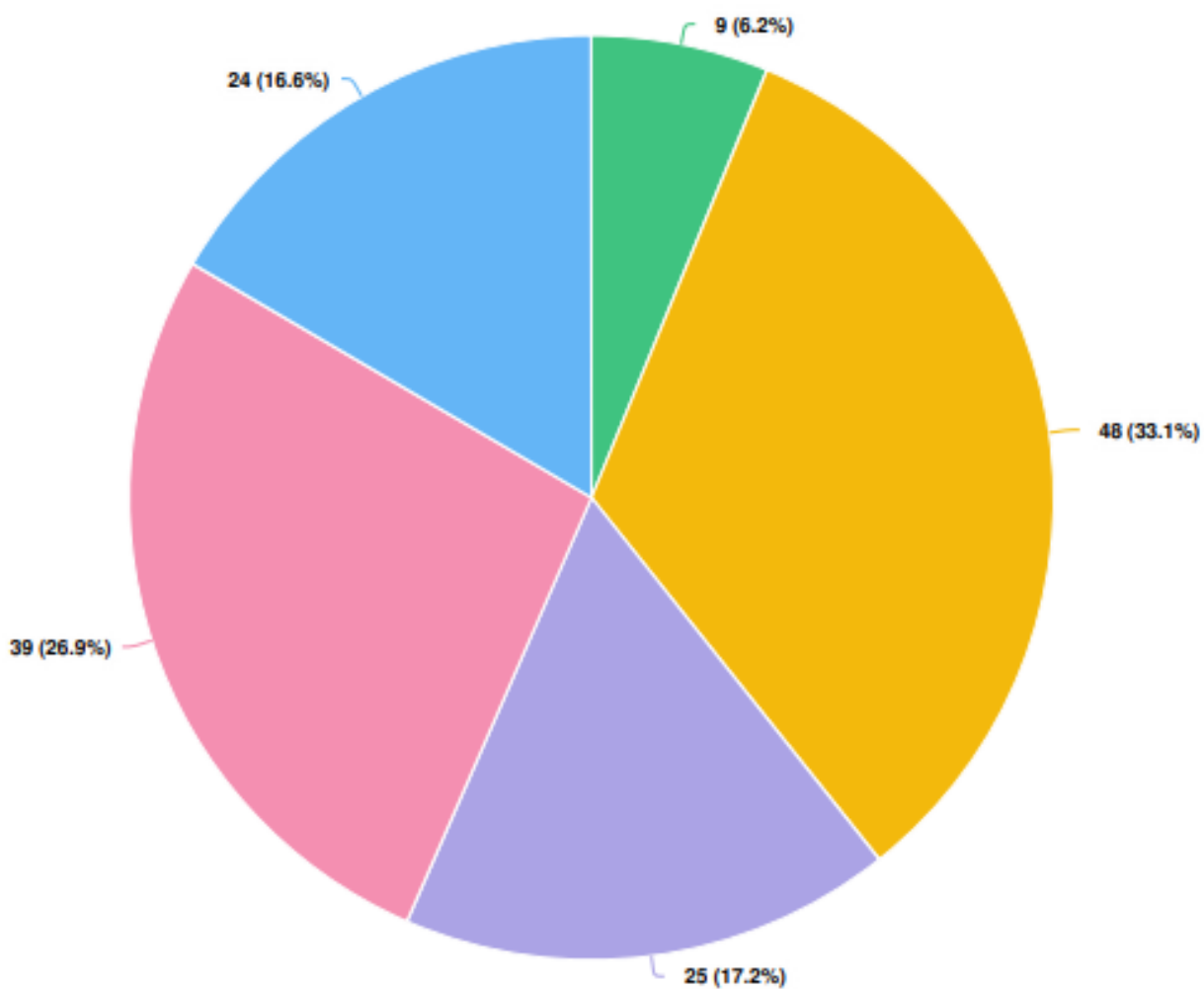


Question options

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

A1.4 Just under 40% of responders agreed or strongly agreed with the Local Plan's overall growth strategy and focus on urban regeneration. We will need to look at why about 46% of people disagreed with it. From the written comments, this appears to be based on objection to proposed greenfield sites, rather than an objection to the overall strategy.

Do you agree with the growth strategy set out in Policy SS1?

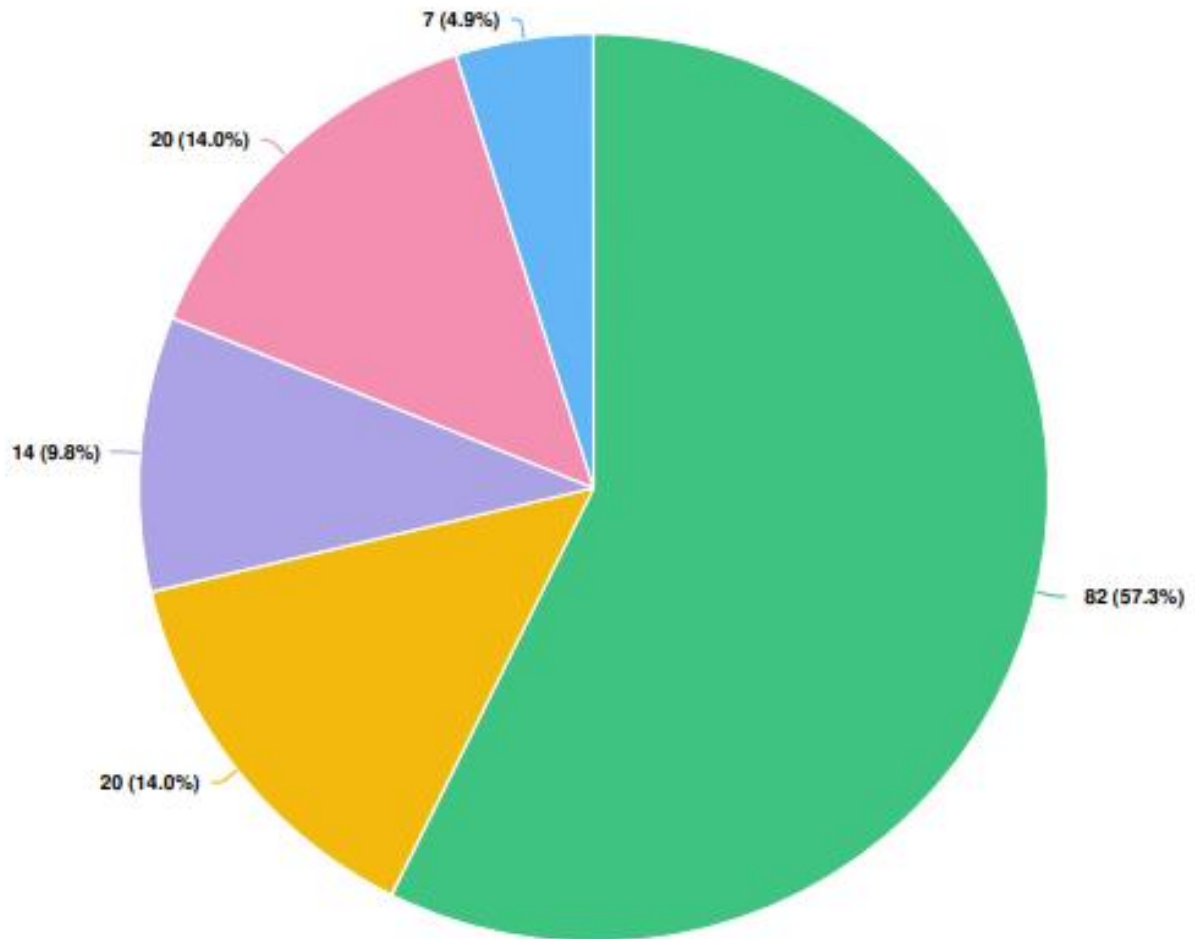


Question options

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

A1.5 Conversely, over 71% of responders agreed or strongly agreed that major development in the south of Torbay should be resisted.

Do you agree with the proposed strategy of constrained development in the south of Torbay?

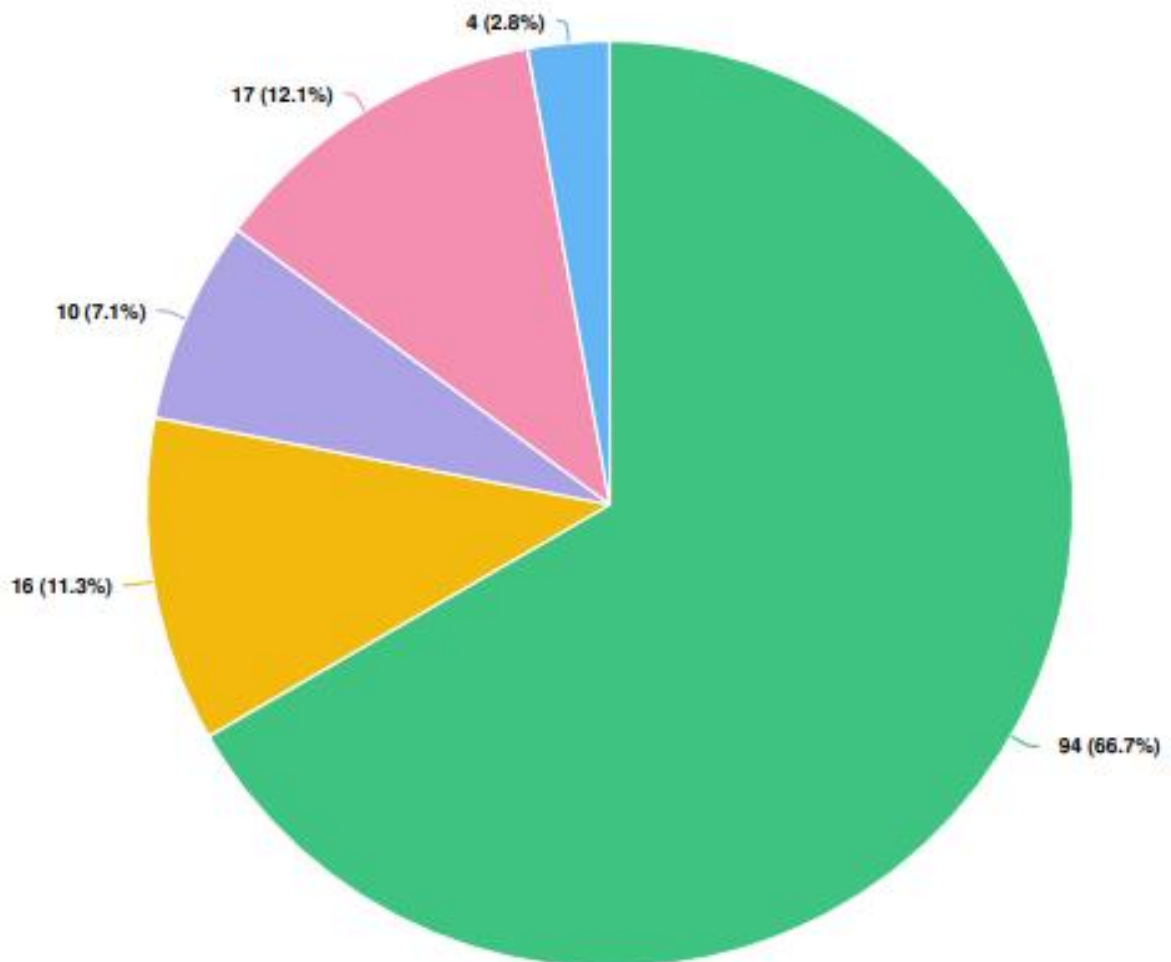


Question options

- Strongly agree - Development in this area should be resisted.
- Agree - Development in this area should be resisted.
- Neither agree nor disagree
- Disagree - Some development should be allowed, but only to support local needs affordable housing.
- Strongly disagree - The area can support major growth to help meet needs.

A1.6 Linked to this, 78% of responders thought that the AONB and its setting should be protected.

Should development in the setting of the AONB be resisted? (The setting of the AONB is the countryside around the AONB.)

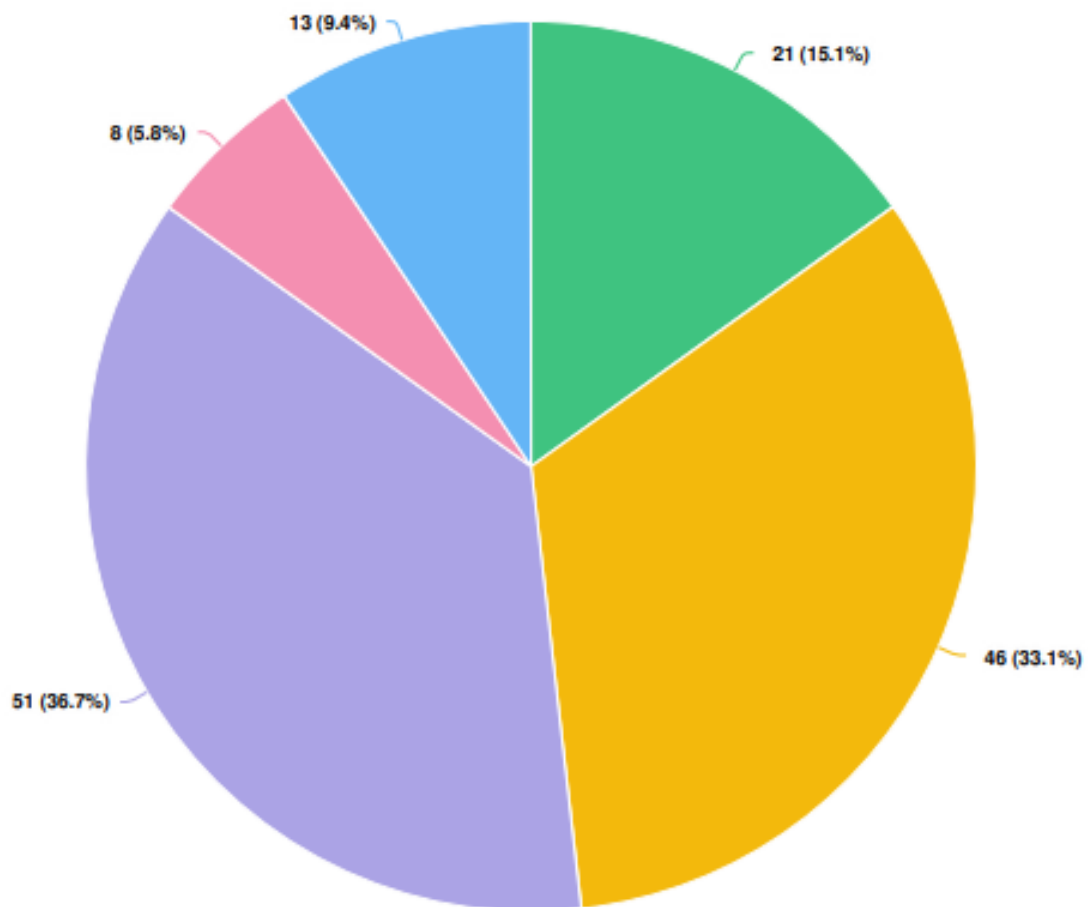


Question options

- Strongly agree - Development in this area should be resisted.
- Agree - Development in this area should be resisted.
- Neither agree nor disagree.
- Disagree - Some development should be allowed, but only to support local needs affordable housing.
- Strongly disagree - The area can support major growth to help meet needs.

A1.7 The consultation asked about Investment Zones, which were supported by just under half of responders as a way of delivering urban regeneration in Torbay. It is worth noting that some of the written comments raised concerns about the environmental harm issues that could come from investment zones.

The council is submitting an expression of interest for Investment Zones. Do you agree that Investment Zones would help deliver urban regeneration in Torbay?

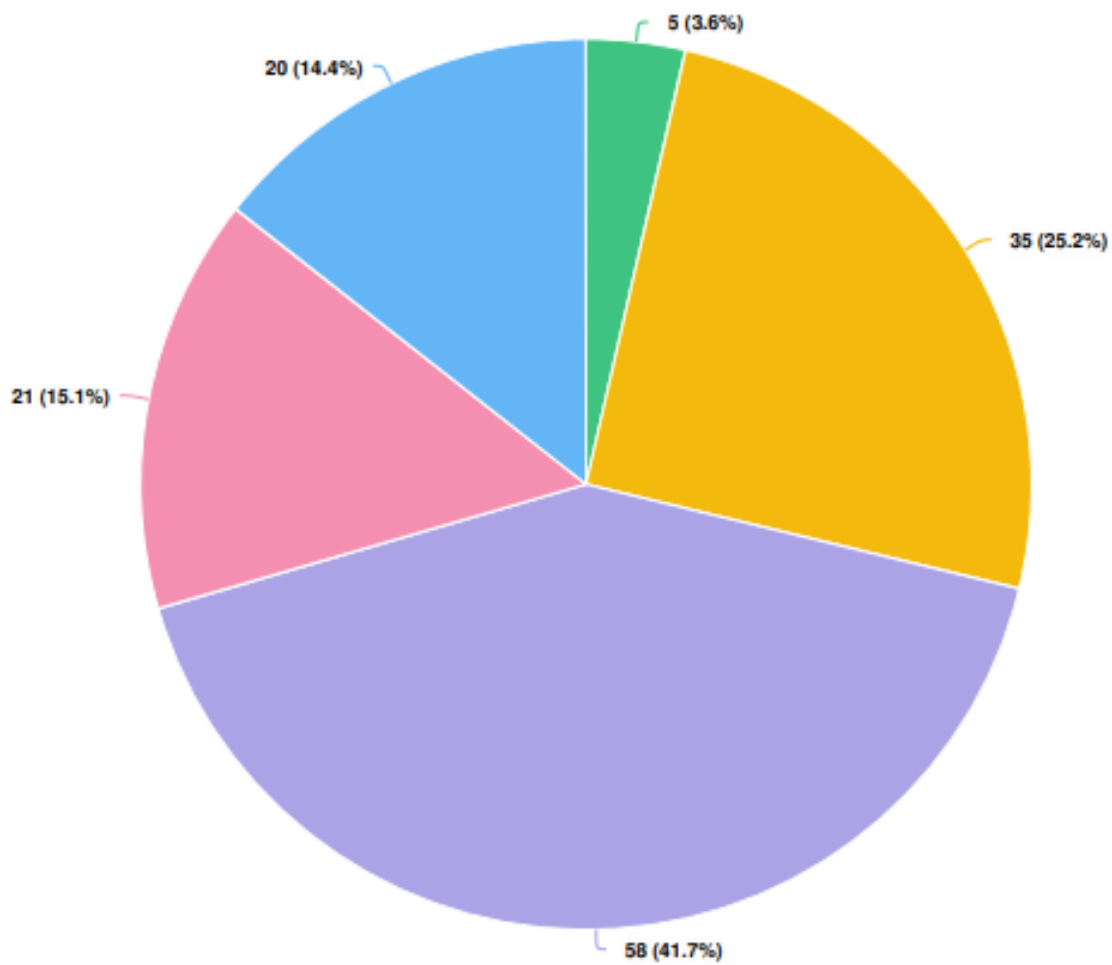


Question options

● Strongly agree ● Agree ● Neither agree nor disagree ● Disagree ● Strongly disagree

A1.8 When asked about extending the Future Growth Area at Collaton St Mary, 28.8% agreed and 29.5% disagreed.

Do you agree with extensions to the Future Growth Area at Collaton St Mary, Paignton (SDP3 Collaton St Mary - extension to Masterplan area) as a broad location for development?

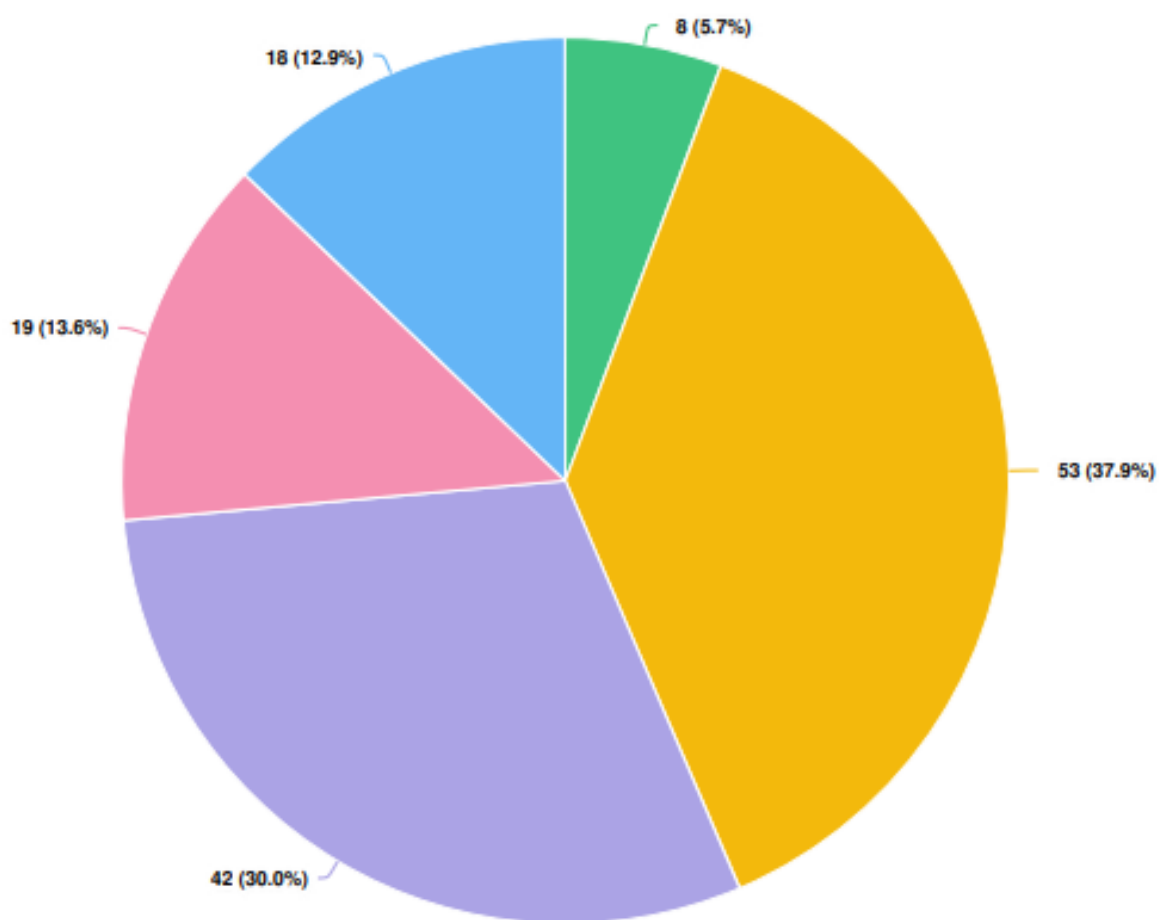


Question options

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

A1.9 There was slightly more support for further growth within the Long Road/Yalberton area, with 43.6% of responses supporting or strongly supporting it, compared to 26.5% opposing it.

Do you agree with extensions to the Future Growth Area at Long Road, Paignton (SDP4 Long Road, White Rock, and Berry Acres, Yalberton) as a broad location for development?



Question options

● Strongly agree ● Agree ● Neither agree nor disagree ● Disagree ● Strongly disagree

A1.10 Asked about infrastructure needs, healthcare and affordable housing were identified as the most pressing need, followed by roads and drainage. (Note that lower scores below indicate that people gave those items of infrastructure a higher priority).

Out of the following types of infrastructure and services, please list in order of priority the most important infrastructure that developer contributions should contribute towards in Torbay (with 1 being the highest priority, 2 the second highest

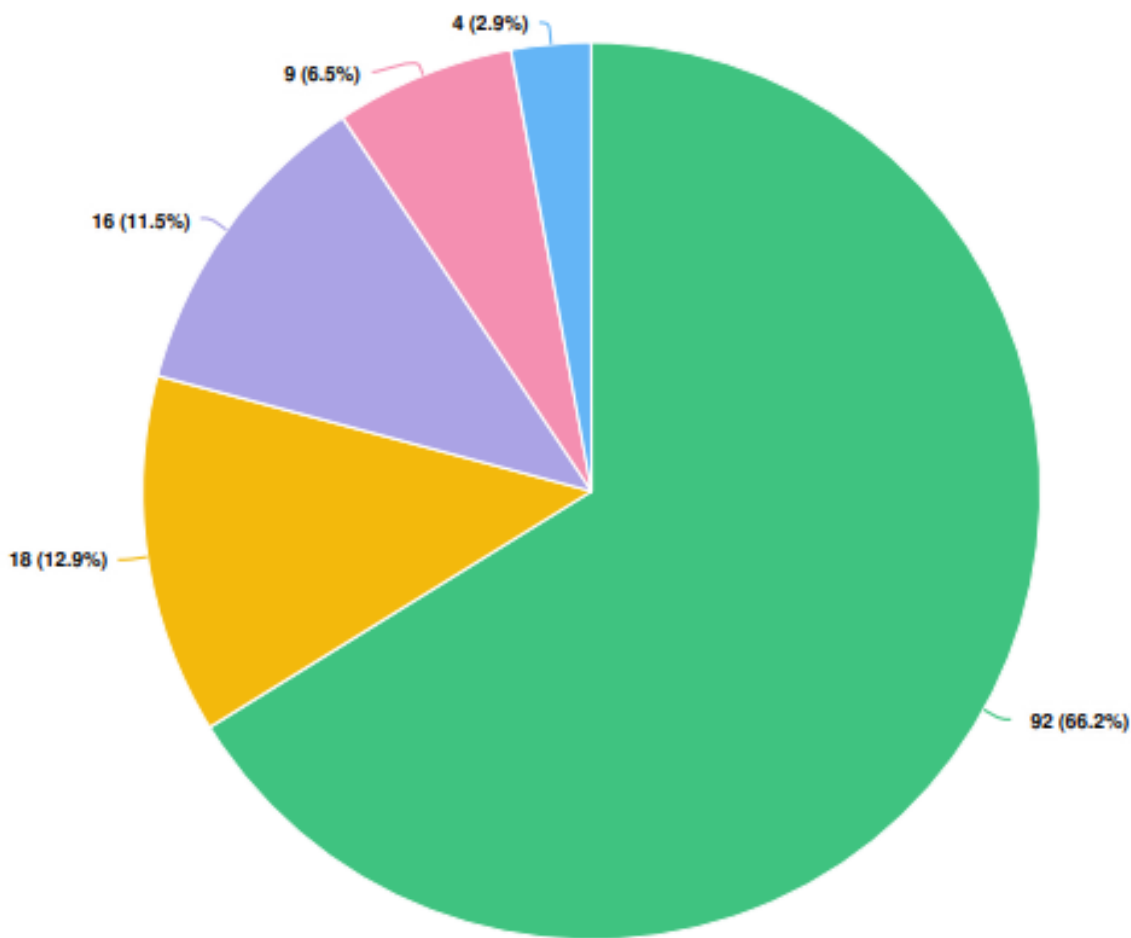
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OPTIONS	AVG. RANK
Healthcare	4.63
Affordable housing	5.68
Road infrastructure	6.06
Drainage and flood prevention measures	6.22
Public open space	6.81
Biodiversity enhancement	7.18
Education	7.49
Public transport	8.37
Police	8.92
Town centre and public realm improvements	9.00
Walking and cycling infrastructure	9.51
Fire and rescue	9.82
Communication infrastructure / broadband	10.15
Employment land	10.18

** Ranking data shown above is limited to 14 options.*

A1.11 Nearly 80% of responders agreed or strongly agreed that new homes should have a “primary occupancy” condition that sought to prevent use as second homes or holiday homes. 44.5 still supported a primary occupancy requirement even if it reduced the level of affordable housing or other developer contributions.

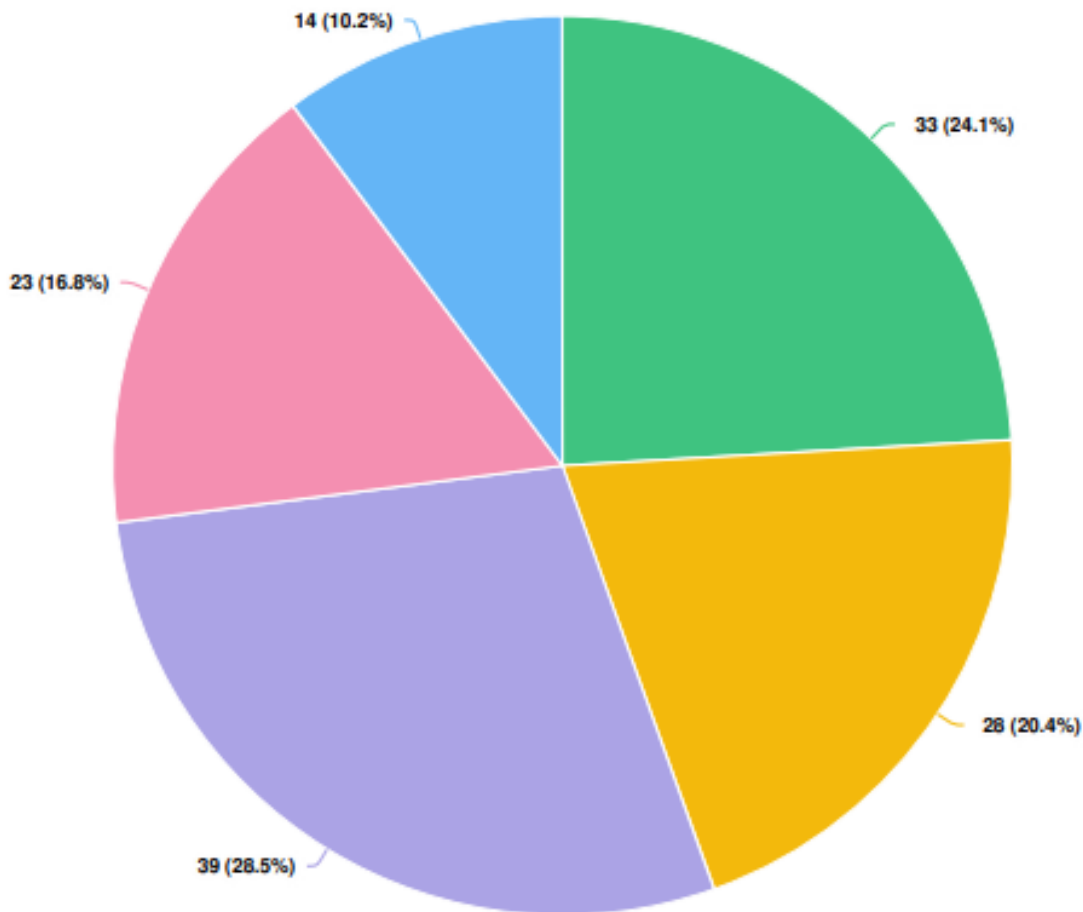
Should the local plan contain a primary/principal occupancy requirement as per Policy SH3 that prevents new housing being used as second or holiday homes unless permission is expressly granted for holiday use?



Question options

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Would you support a primary occupancy requirement if it reduced the level of affordable housing or other developer contributions that can be secured on a site?

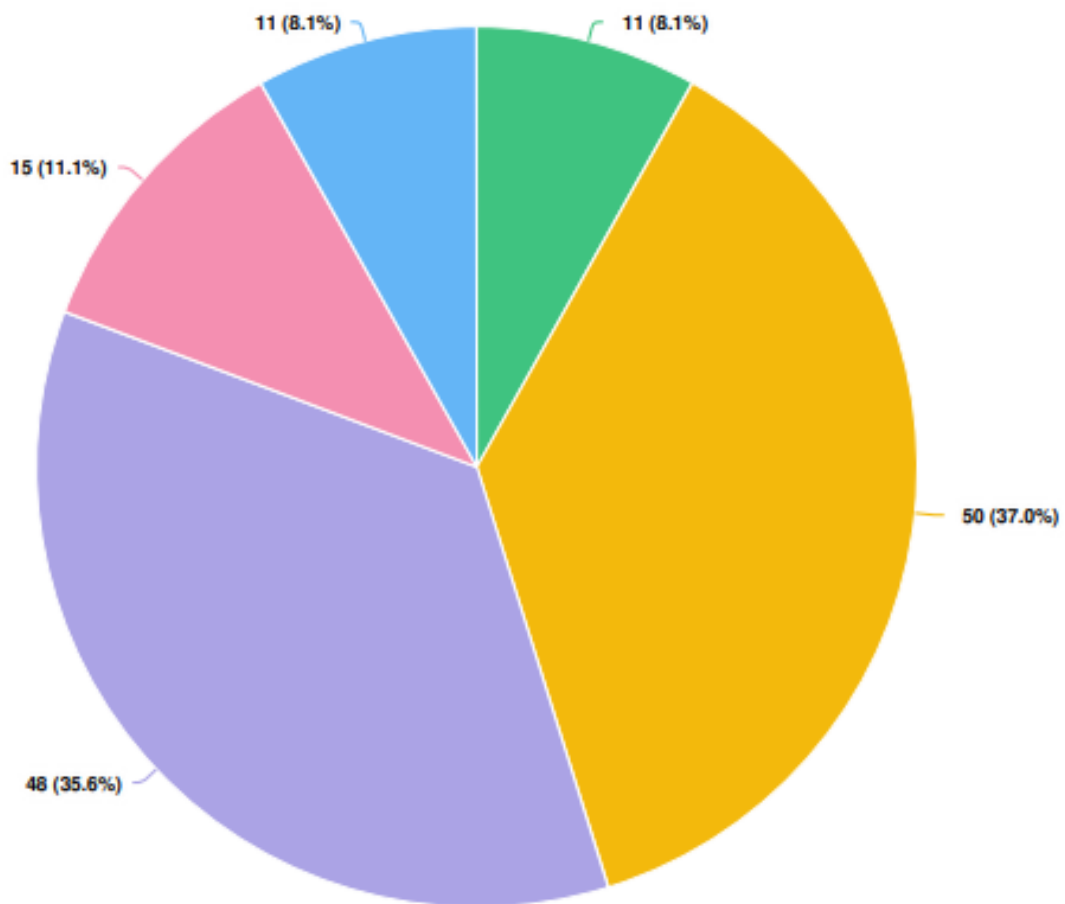


Question options

- Strongly agree - I would support a primary residency even if it meant no affordable housing.
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree - Affordable housing delivery should always be prioritised over a local occupancy condition on market housing.

A1.12 In terms of Policy SH4 on affordable housing, the policy was supported by 45% of responders. As noted there was considerably more support for affordable housing than there was for open market housing that was perceived as unaffordable to local people.

Do you agree with the proposals in Policy SH4?

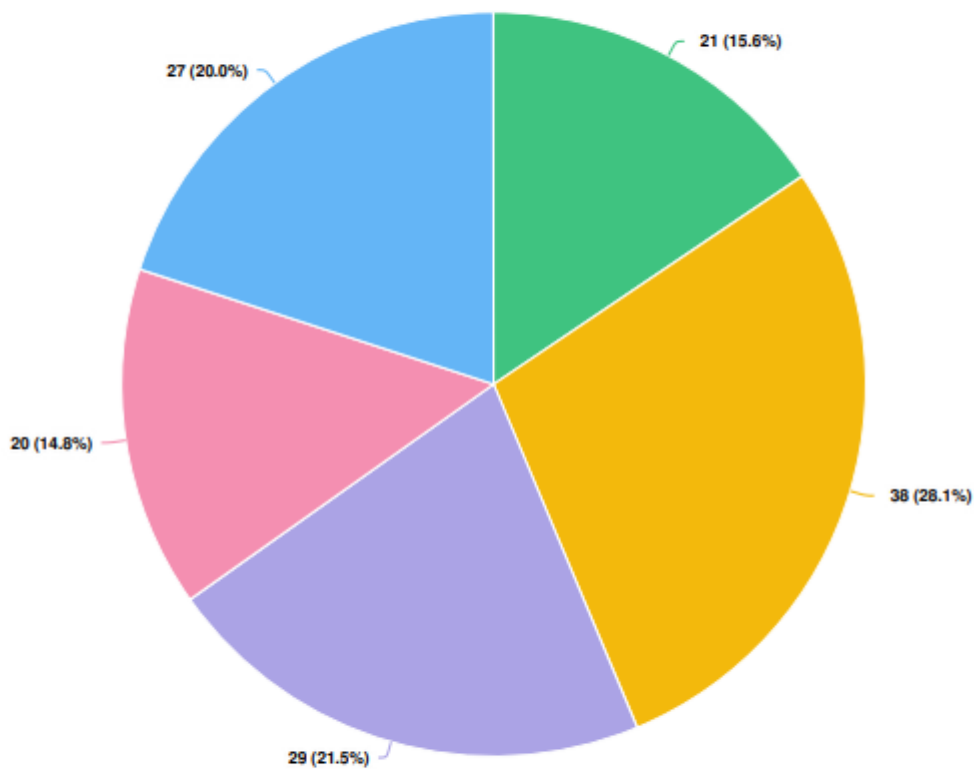


Question options

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

A1.13 The consultation asked about locating stopping places for Travellers as part of Future Growth Areas. This was supported by just under 44% of responders. However, the subject is often highly controversial and some of the housebuilders and neighbour authorities commented on it, and these comments will need to be considered in more detail.

Do you agree with the proposals in Policy SH7 to provide two stopping sites for Travellers?

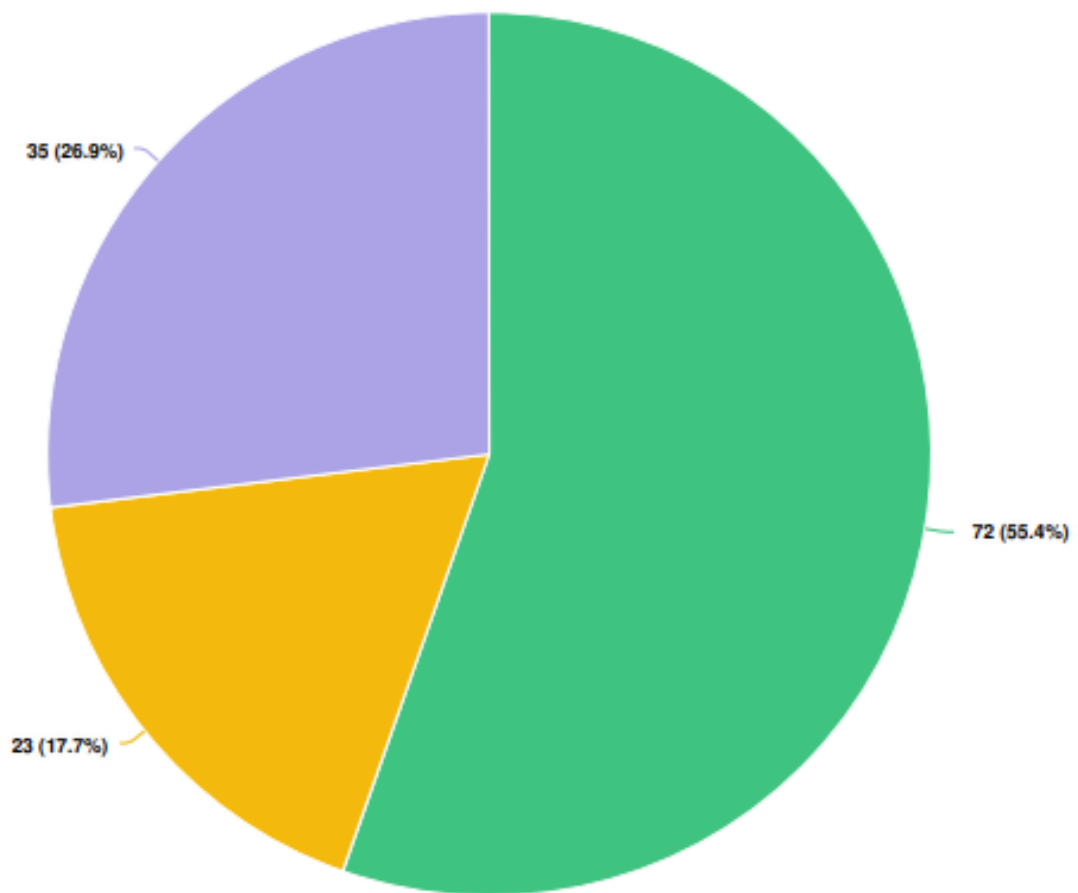


Question options

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

A1.14 The consultation asked whether the Local Plan should contain specific allocations for older people. There was a strong level of support (55% -yes) for this.

Should the Local Plan make specific allocations for specialist accommodation for older people?

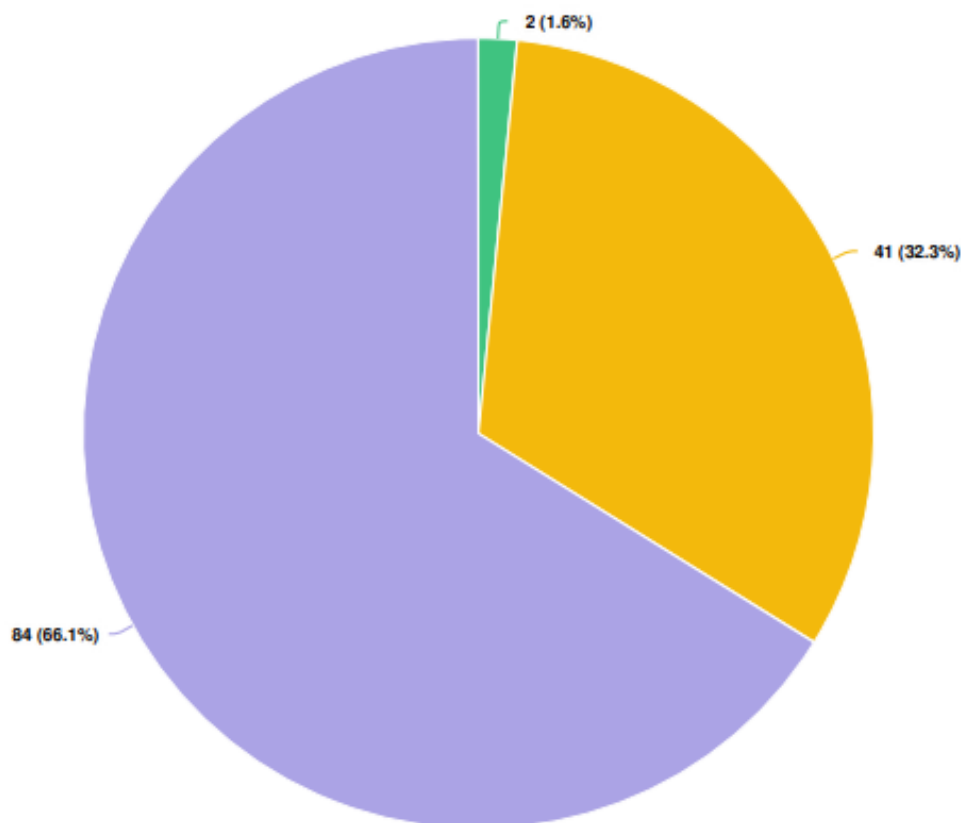


Question options

- Yes
- No
- I don't know

A1.15 One element in the Levelling Up and Regeneration Bill (as it then was) was to make Local Plans much more strategic and to leave detailed development management policies (NDMP) to the national development management policies (currently the NPPF). Over 98% of responders said that the Local Plan (and Neighbourhood Plans) should set out locally specific development management policies rather than leaving this to a national framework. It is noted that the Levelling Up and Regeneration Act and secondary legislation will affect the level of detail that is permissible within local and neighbourhood plans.

On detailed development management matters, how far should we rely on government guidance such as the NPPF? (Please indicate which best fits your view.)



Question options

- We should leave everything to government guidance. There is no point in duplicating government policy.
- We should rely on the government guidance except where Torbay faces specific issues.
- We cannot rely on government policy to provide appropriate development management policies for Torbay.

Optional question (127 response(s), 51 skipped)

Question type: Radio Button Question

Appendix 2: Summary of Key Messages from Map Pin Tool on EngagementHQ

In Addition to the survey, the Engagement HQ consultation allowed respondents to “pin” comments onto a map of Torbay and make site specific comments. The following is an initial assessment of those “pins”

<u>Site</u>	<u>Number of pins</u>		
	<u>Suitable</u>	<u>May be suitable</u>	<u>Not suitable</u>
<u>Strongest opposition to the following sites:</u>			
Sladnor Park (H2T01)	1	1	25
Sandringham Gardens (West of Preston Down Road) (H2P01)	1	0	81
<u>Moderate opposition to the following sites:</u>	<u>Suitable</u>	<u>May be suitable</u>	<u>Not suitable</u>
Former Living Coasts, Beacon Hill (TCRT18)	1		7
Land North of Bottompark Lane (H2T05)	1	0	12
Land at Kingskerswell Road (Kingskerswell Fields A & B) (H2T03)	0	1	6
Land adjacent to Broadley Drive, Livermead (H2T09)	0	0	7
Preston Down Road North (H2P02)	1	2	6
Preston Down Road South (H2P03)	0	1	10
<u>More minor/localised opposition to the following sites:</u>	<u>Suitable</u>	<u>May be suitable</u>	<u>Not suitable</u>
The Marina Car Park (TCRT17)	1	2	4

Land at Hamelin Way and Moles Lane (Edginswell) (SDT3a*) (Principle established)	0	0	4
White Rock: Land at Local Centre (H2P09)	0	0	3
White Rock: Land off Limekiln Close (H2P10)	0	0	3
Land North of Totnes Road (SDP3i* and SDP3e)	0	0	3
Land North of Lower Yalberton Holiday Park, Long Road (SDP4c)	0	0	3
Yalberton Holiday Park/Berry Acres 'Link' (SDP4a)	0	0	4
<u>Some minor support for the following sites</u>	<u>Suitable</u>	<u>May be suitable</u>	<u>Not suitable</u>
Grand Hotel Garage Site (H2T08)	3	1	0
Babbacombe Business Park (H2T04)	4	0	0
Town Centre Car Park, Brixham (TCRB01*)	2	0	0
<u>Strong support for the following sites/locations:</u>	<u>Suitable</u>	<u>May be suitable</u>	<u>Not suitable</u>
Various Torquay Town Centre sites			
Various Paignton Town Centre sites			
Hollicombe Gas Works	10	2	1
<u>Sites with minimal/varied response</u>	<u>Suitable</u>	<u>May be suitable</u>	<u>Not suitable</u>
Archery Field, Dartmouth Road (H2BCG02)	1	3	1

Hilltop Nursery, Kings Ash Road (H2P04)	1	0	0
Land off Fishacre Close, Great Parks (H2P05)	1	0	0
Western half of Taylor Wimpey Site, North of Totnes Road (SDP3d)	0	0	1
Land adjacent Bona Vista Holiday Park, Totnes Road (SDP3a)	1	0	0
Land adjacent Beechdown Farm Bungalow, Totnes Road (SDP3b)	1	0	0
Plot 1 & 2, Totnes Road (SDP3c)	1	0	0
Council Depot, Paignton (E1P01)	1	1	1
Lower Yalberton Holiday Park, Long Road (SDP4h)	0	0	0
<u>New sites raised for consideration:</u>	<u>Suitable</u>	<u>May be suitable</u>	<u>Not suitable</u>
Land between Brim Hill and Rockhouse Lane, Maidencombe Village, Torquay	7	0	0
Various sites around Longpark Hill, Maidencombe	1	0	1
Land North of Brunel Lodge and West of Teignmouth Road, Torquay	1	0	0
Torquay Golf Club	1	0	0
Torquay United Stadium in Plainmoor	1	0	0
Former Torquay Probation Office, Thurlow House, 35 Thurlow Road, Torquay	3	0	0
Quarry House Vets, 148 Teignmouth Road, Torquay	1	0	0
Former Elektron Technology premises, Woodland Road, Torquay	1	0	0

Former 'The Original Factory Shop' premises, Palace Avenue, Paignton	2	0	0
Former 'Jack Sears House Residential Care Home', Dartmouth Road, Paignton	1	0	0
Land between Lancaster Drive and Fairlawns Park	1	0	0
Torbay Trading Estate, New Road, Brixham	3	0	0

Appendix 3 Torbay Local Plan Housing Growth Options October-December 2022. Initial Feedback on Consultation Responses.

The following summarises the comments made in letters and emailed Comments, Engagement HQ Specific Comments) in more detail. They are in addition to the number of qualitative responses received in the Engagement HQ Surveys. Accordingly, there may be some overlap of numbers of objections etc.; but these are recorded to ensure that qualitative comments have been captured. In particular, agents, national consultees and other stakeholders have tended to submit representations via emailed letter. These representations will raise important Test of Soundness matters that it is important to consider in plan making.

Representations on Regulation 18 Site Options Consultation 28 October-5 th December 2022				
ID	File No.	Person /Organisation Consultee	Summary of Representation.	LPA Response
National organisations				
		RSPB England (Helene Jessop)	<p>Overarching comment relating to Cirl Buntings. Present on a wide variety of habitats in Torbay. Should be taken into account for all farmland being considered for development.</p> <p>Built development can have a major detrimental impact on cirl buntings, so appropriate compensatory habitat provision is required to avoid net loss - and enhancement of existing habitats for nature is also crucial for The RSPB strongly also recommends that Torbay Council acknowledges the important role that restoring, conserving and enhancing nature plays in mitigating the effects of climate change.</p> <p>The RSPB strongly recommends that Torbay Council recognises that, if developments will impact on cirl bunting territories, the best outcome (aside from avoidance of impact by zoning new developments away from sites with high concentrations of cirl buntings - a site that supports 10 or more pairs is nationally important) is to require off-site compensatory habitat to be secured (s106 agreements) in perpetuity, with funding sufficient to enable appropriate farming management in order that there is (a) no net loss and (b) biodiversity net gain. RSPB experience is that delivering cirl bunting mitigation habitat on site within a development is not likely to be successful, given the species' need for farmland habitats and management and that small, isolated sites will not deliver the benefits for cirl buntings and other biodiversity that using developer financial contributions to secure larger, better connected sites will achieve. While recognising that on site mitigation (maintenance of dark commuting and foraging vegetated corridors) is essential for greater horseshoe bats, we consider that off site compensatory habitat is the best way of addressing habitat loss for cirl buntings arising from built development. We recommend that Torbay Council adhere to the guidance in Wildlife and Development Guidance Note: Cirl Bunting (Devon County Council, Teignbridge District Council and Torbay Council, 2017) but explore ways of using developer contributions to deliver and manage compensatory habitat for cirls that do not rely on Torbay Coast and Countryside Trust managed land. We are concerned that TCCT management is not delivering the best outcomes for cirl buntings at present. Given the existing level of built development and proposals for new housing, the RSPB considers that compensatory options should be explored outside as well as within Torbay. We are also concerned at the likely increase</p>	

		<p>in recreational impacts on Berry Head and recommend measures to provide for the daily recreational needs of new residents from housing in the area via appropriate green space that is designed and managed to provide opportunities for nature as well as people.</p> <p>In relation to greater horseshoe bats and the South Hams SAC, the RSPB recognises that well vegetated dark corridors for commuting and foraging, with adjacent invertebrate rich cattle grazed pasture is essential and that those corridors must be maintained in situ within and around any site identified as significant for greater horseshoe bats.</p>	
	Sport England (Gary Parsons)	<p>Comments about Local Plan evidence base for sport and recreation</p> <p>We note the Council's recently completed Playing Pitch Strategy which covers pitch sports, tennis and bowls. There is no current assessment for swimming pools, sports halls, golf courses, athletics tracks, cycling, equestrian, motor sports etc which the Council may consider as a future phase of sporting assessment to provide evidence for the development plan.</p> <p>Planning obligations should be used to secure sport provision. Sport and recreation including playing fields should have policy protection. (in addition to NPPF99) There should be an active design policy – model policy and developer checklist provided.</p> <p>Community use of education sites should be promoted. Sport England provide guidance on this.</p>	
	Natural England (Stephanie Parker-Stephenson)	<p>Support intention in the Local Plan to protect the natural environment. Evidence should be provided as part of the SA and HRA to justify the site selection process. Sites of least environmental value should be selected. BMV agricultural land should be avoided.</p> <p>NE welcomes undertraining to provide further evidence of impact on environmental matters.</p> <p>Coastal allocations should consider access and coastal management issues.</p> <p>Issues relating to specific sites:</p> <p>Policy SH2: The housing allocation at Sandringham Gardens (H2P1) is potentially a brownfield site of biodiversity interest as the Priority Habitat Inventory indicates that it might contain open mosaic habitat.</p> <p>Priory species and habitats: The proposed site allocations at Brunel Manor (H2T2), Hollicombe (H2T29), 24 Grange Road (H2P8), and Torbay Industrial Estate (H2B5) are likely to affect areas of priority habitat - Deciduous Woodland. Stoodley Knowle (H2T18) might be an Important Fungus Area</p>	

		<p>Nature recovery - Sladnor Park (H2T1), Brunel Manor (H2T2), Hathcombe Lane (H2T13), Former Dairycrest (H2T21), Hollicombe (H2T29), and Torbay Industrial Estate (H2B5) contain woodland core nature area components of the Devon NRN. Land at Preston Down Road (H2P2 & H2P3), Hilltop Nursery (H2P4), North of Luscombe Lane (H2P11), and Great Parks Phase 2 (H2P12) contain woodland, wetland, and grassland core nature area components of the Devon NRN.</p> <p>Landscape - Wall Park extension (H2B1) and St Marys Road (H2B6) are within the South Devon AONB, and Northcliff Hotel (H2B3) is close to the South Devon AONB boundary. Where a proposed allocation is within, or within the setting of, an AONB the proposal should be supported by sufficient evidence to demonstrate that the allocation will not adversely affect the natural beauty of the protected landscape (and that alternative sites have been fully considered). The allocation policy should respond to and maximise opportunities to enhance the character of the landscape.</p> <p>Green Infrastructure - Do the allocations at Sandringham Gardens (H2P1), H2BCG2, Waddeton Close (H2P9), Limekiln Close (H2P10), and Brixham Paint Station (H2B2) result in any loss of accessible greenspace?</p> <p>Access - The development proposal at Hollicombe (H2T29) needs to consider potential impacts on the SW Coast Path. Development of the sites at Watcombe Hall (H2T10) and Conway Court (H2T25) may affect public right of way footpaths that should be protected.</p> <p>Coast – a few proposed site allocations are within proximity of the coast. The Shoreline Management Plan indicates that for most policy sections there is a “Hold the Line” policy but there are a few sites, such as at Babbacombe Business Park (H2T4), Grand Hotel garage Block (H2T8), Stoodley Knowle (H2T18), and Palace Hotel (H2T19), where the SMP policy is No Active Intervention across all three epochs.</p> <p>General comments- Some sites are within the South Hams SAC Landscape Connectivity. Zone</p> <p>The Plan should include a green infrastructure policy. NE guidance is available.</p> <p>Nature Recovery The Plan update provides an opportunity to enable the effective delivery of biodiversity net gain, and the opportunity to embed nature recovery networks and the principles of the Local Nature Recovery Strategy within the Plan.</p> <p>Landscape The plan should give “great weight” to conserving and enhancing the character of designated landscapes, enabling only ‘limited’ development and requiring the highest standards of design and environmental quality for development within them.</p> <p>Agricultural Land and Soils A substantial number of sites (including future growth areas) are identified provisionally as being Grade 2 best and most versatile agricultural land (BMV). We understand that the Council are currently undertaking a soil assessment to consider the cumulative loss of BMV and we will be able to provide detailed comments following completion of the assessment</p>	
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		Detailed comments on the Sustainability Appraisal, environmental evidence base and recreational impacts upon the Lyme Bay and Torbay Marine SAC.	
	Historic England (Rohan Torkildsen)	<p>Reiterate previous comments:</p> <p>SDT2 – concerned about the impact of tall buildings in historic locations. Tall Buildings advice and Torbay Tall Buildings Strategy (2010) should be taken into account.</p> <p>SDT3 May be appropriate to add criteria to ensure due regard to conserving the significance and setting of listed buildings.</p> <p>Support addition of heritage criteria in SDP2 and SDP3, SDP4 Long Road- support the proposed designation of conservation areas at Lower and Higher Yalberton. Should also refer to enhancing the setting of listed buildings in the area.</p>	
	National Trust (Donna Crabree)	<p>The National Trust as a conservation charity supports the omission of sites presented in the previous Growth Options Consultation which would, if developed, result in significant or severe landscape and ecological harm. However, the NT is concerned that a low growth approach could result in speculative applications and appeals.</p> <p>More detail is needed about where unmet need can be met. It has not been demonstrated if agreement to accommodate unmet need (with neighbours) has been achieved.</p>	
	Environment Agency (Shaun Pritchard on behalf of)	<p>Overall, the allocations document does not present any major concerns in respect of impacts on environmental receptors.</p> <p>EA draw attention to sites that have environmental or conservation designations that need to be protected:</p> <p>Sladnor Park, Maidencombe- County Wildlife site and woodland+ coastal slope.</p> <p>Former Palace Hotel, Babbacombe Road CWS and woodland</p> <p>Former Stoodley Knowle School, Ansteys Cove Rd: CWS, woodland and coastal slope</p> <p>Site North of Luscombe Lane, Great Parks & Great Parks- Phase 2: Allocation H1:12 CWS with mixed habitats, opportunities to restore watercourse habitat by de-culverting.</p> <p>Hollicombe Gas Works, Torbay Road - Hollicombe Stream</p> <p>Water Framework Directive improvements: there is a future growth area and some proposed housing allocations within the Aller brook (GB108046005330). Risk to deterioration of water quality should be assessed at the earliest opportunity.</p>	

		<p>Impact of development upon Tor Bay water bathing and shellfishery water quality should be assessed</p> <p>Development is proposed within Floodzone 2 and 3 and areas at risk of surface water flooding. EA has no in-principle objection to this, but flood risk is a constraint that will dictate the form and layout of development</p> <p>The council may need to seek financial contributions towards the upkeep of existing assets that provide a flood defence benefit i.e. Haldon Pier, and/or funding towards planned defences i.e. Paignton Sea Defence scheme. The status of Torbay as a Critical Drainage Area does mean that several of the allocations would result in betterment in terms of downstream flood risk, for example Galmpton (H2BCG02).</p> <p>Redevelopment of the car park in Brixham (TCRB01) provides an opportunity to address any culverted watercourse assets that sit under the site that are in a poor condition and which may not outlast the lifetime of development.</p>	
	National grid (Lucy White Planning Limited)	<p>General comment:</p> <p>High voltage power lines should be taken into account where they are present on allocated sites. If undergrounding of powerlines is necessary, this will affect viability and should be considered as an additional cost. Priority should be given to retention of overhead lines where possible. Early engagement with National Grid should take place where they may be affected or where diversion/undergrounding is needed. Masterplanning of strategic sites is recommended.</p> <p>SDP4 (A-F) Yalberton- affects the main powerline going into Torbay. Some applications have permission and retain existing overhead lines in-situ. The National Grid support this approach. Masterplanning of the area should take place that seek to retain overhead powerlines. Reference should be made to overhead powerlines in the supporting text to SDP4.</p>	
	Torbay and South Devon NHS Foundation Trust	<p>Seek planning contributions towards healthcare and primary healthcare needs. Statement in Policy SH8 about healthcare contributions should be a standalone policy.</p> <p>Based upon the 3,931 additional dwellings in the final sites option consultation, we have calculated that there will need to be an additional 708m² of Primary Care infrastructure to support the additional patients and at current market rates this equates to a capital investment of £3.9m for which there is no available NHS funding.</p> <p>Furthermore, these developments will create an additional 8,500 healthcare interventions per annum across the Torbay and South Devon NHS Foundation Trust catchment area which will require additional healthcare capacity however there is no available NHS funding available to support this.</p> <p>There are GP shortages across Torbay. A Primary care contribution of £935 per dwelling is sought to address this.</p>	

		<p>Acute and community care contribution of £550 per dwelling is sought for acute and community care (although this may increase).</p> <p>Detailed site assessments on allocated sites: The underlying theme is that there is a shortage of Primary and annual healthcare capacity that will generate need for additional health services. Used as evidence to calculate the need for £935+£550 per additional dwelling.</p>	
	Devon and Cornwall Police (David White,	<p>Development must be sustainable and in order to be so, it should contribute towards the cost of the essential police infrastructure required as a direct result of population growth and housing development, the two of which are inextricably linked. The population of Torbay is forecast to grow and this will place additional demands on our service which must similarly be increased in parallel with the housing numbers if the same level of service is to be sustained and increased to encompass the new communities.</p> <p>We would like to see policies embedded in the local plan to assist in seeking developer contributions towards policing.</p>	
	Devon and Cornwall Police (Kim Burnett, Designing out crime officer)	<p>Aspiration 5: Create More sustainable Communities. This should avoid naming crime hotspots as this can have a negative impact on these areas and can affect Police responses to planning applications. Aspiration 5 should also mention (reducing) anti-social behaviour (NPPF para 92b).</p> <p>Policy H6 on HMOs should require a clear management policy to be in place prior to occupation and for necessary repairs to be undertaken as soon as possible. Lack of repairs can lead to wider deprivation- "Broken window theory".</p>	
Neighbouring Planning Authorities			
	Devon County Council (Mike Deaton)	<p>Comments relating to cross boundary infrastructure issues. If Torbay's unmet need has to be met by neighbour authorities, it is essential that DCC are involved to ensure that sufficient provision is made for strategic infrastructure.</p> <p>Education- sufficient school places need to be provided including SEND places. There may be cross boundary SEND needs.</p> <p>Flood risk and drainage- Proposed allocations in Goodrington may impact on drainage outside Torbay (assume this means surface water runoff towards the Dart Valley). Some developments elsewhere could drain into Torbay.</p> <p>Highways and Transportation: Key cross-boundary infrastructure includes the Heart of Teignbridge Local Cycling and Walking Infrastructure Plan (LCWIP) and link with the Torbay LCWIP. Measuses should seek to reduce traffic impact from developments on the A380 (South Devon Highway). DCC support the proposed railway station at Edginswell.</p> <p>Other infrastructure issues may arise that require cross boundary working, including funding applications.</p>	

	<p>Exeter City Council (George Marshall on behalf of)</p>	<p>The City Council's previous comments underlined support for the regeneration and brownfield objectives of the Torbay Local Plan and acknowledged the environmental challenges in the Bay. Indeed, Exeter faces similar issues and is proactively pursuing a spatial strategy to fully meet housing needs whilst protecting environmental assets and maximising brownfield development.</p> <p>The current proposals only meet about half of Torbay's needs. More evidence is required to allow a more robust conclusion about housing capacity. There would be significant implications for neighbours if Torbay is unable to meet its needs.</p> <p>Exeter is struggling to accommodate its own need and seeking to achieve 85% of new homes on brownfield sites.</p>	
	<p>Teignbridge District Council (Michelle Luscombe on behalf of)</p>	<p>SS1 –Climate Emergency support the plan's aspirations to respond to the climate emergency.</p> <p>Employment Land – It is difficult in practice to secure mixed use employment and residential use, particularly for old Class "B" uses. An alternative option would be to identify strategic employment sites in the most economically viable locations, to maximise opportunities for inward investment and indigenous business growth. Developer obligations would only work where there is a site(s) for this to be invested in.</p> <p>We would ask that further information and evidence is provided at Regulation 19 stage to demonstrate that the current approach is deliverable, if it continues to be pursued, so that there is no expectation that unmet need for employment land will need to be accommodated outside the plan area.</p> <p>Housing numbers Torbay Council has previously formally notified all local authorities within its neighbouring Housing Market Areas that it is unlikely to be able to accommodate all its housing need within its own boundaries. Based on the Standard Method there is a shortfall of 6,000 homes that would need to be met outside of Torbay (based on a total LHN plus 20% buffer of 5,550 dwellings in years 1-5 and 11,400 over 18 years)</p> <p>The NPPF allows just 10 years of supply to be identified NPPF67 (in the 2021 version) – suggest scaling back the timescale to focus on the first 5 years.</p> <p>Not meeting needs in full is in conflict with Aspiration 5. Object to wording of SS1 that the policy sets the minimum number of homes that Torbay must provide.</p> <p>Teignbridge support the principle of brownfield regeneration, but have had to allocate significant greenfield sites to meet needs. Unmet need from Torbay would need to go onto greenfield sites in Teignbridge, which has significant constraints. Teignbridge is also constrained environmentally, with designations including the Dartmoor National Park, three European Wildlife Sites, Mineral Safeguarding Areas, Undeveloped Coast and a significant number of heritage assets.</p>	

		<p>We therefore request that as part of future work on Torbay’s plan preparation that an objective review of Torbay’s HELAA is carried out to identify the potential of currently discounted sites, as well as a cross boundary assessment of discounted sites in neighbouring authorities to understand comparative levels of impact.</p> <p>Brownfield opportunities should be set out in more detail in the Regulation 19 Plan. May involve more detailed urban capacity or renewal studies.</p> <p>Undertake to continue to work constructively with Torbay. More work is needed on</p> <ul style="list-style-type: none"> • Any displacement of housing from Torbay to Teignbridge deemed necessary to avoid harm in Torbay needs to be balanced against the harm likely to occur as a result of further development in Teignbridge. • Extent of need in Torbay. An objective assessment of how unmet housing need might be appropriately redistributed across the housing market areas, taking into account economic growth and employment opportunities across the sub-region, social ties, and how the displacement of indigenous housing need will affect the future prosperity of Torbay. This includes gaining an understanding of what proportion of housing need in Torbay originates from outside the Devon area, which may reasonably be distributed across the wider Exeter and Plymouth HMAs because there is no strong connection to being located specifically in the Torbay locality. • Any strategic infrastructure implications for other authorities should they accommodate Torbay’s needs and how this would be satisfied and paid for. • Significant investigations into brownfield potential. • Justification for an 18-year plan period. <p>Affordable housing- the Torbay HENA indicates a need for 720 affordable homes a year. This is in excess of the total housing target. This is a significant concern to Teignbridge, given our own affordable housing challenges, and the potential displacement of households in need as a result of Torbay not being able to accommodate its full OAN within its boundaries.</p> <p>However, caution should be exercising is projecting need for additional home ownership into need for additional dwellings. Important to scrutinise the evidence so that Torbay doesn’t identify an unrealistic level of need,</p> <p>Policy SDT1 Torquay Growth Strategy states that a strategic green gap will be maintained between Torquay and Kingskerswell. It should be made clear in the supporting text of this policy that the majority of land between the built-up area of Torquay and the village of Kingskerswell lies outside of Torbay and is within Teignbridge. It should also consider what would constitute a “strategic green gap”, given the identification of a Future Growth Area at Torquay Gateway, on land to the north-east of Torquay Road.</p> <p>Policy SDT3 Torquay Gateway again refers to the requirement of a “green gap” between the gateway development and the village of Kingskerswell, but does not elaborate on how the setting of the village would be protected. This should be included within supporting text.</p>	
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		<p>Policy SHS - Opportunities for urban regeneration should be set out in more detail and capacity set out in the formal numbers in the Plan.</p> <p>Policy SH3 We support for the inclusion of Policy SH3: Principal Occupancy, which reflects the ambition of the Proposed Submission Teignbridge Local Plan.</p> <p>Policy SH5 5% self-build target would appear ambitious. 2% may be more realistic. The proposed level will need to be justified on the basis of Torbay evidence.</p> <p>Policy SH7 Policy SH7 identifies a need for 2 transit pitches/temporary stopping sites. The Plan should cater for the full identified Gypsy and Traveller needs, as based on evidence, to prevent any future possibility of it needing to be accommodated outside Torbay. In addition, we have had experience of the difficulties of delivering on-site Gypsy and Traveller pitches on housing developments within major development sites and suggest that the Council looks for possible suitable sites specifically for this use.</p> <p>Policy H2T3 Housing Site H2T3: Land at Kingskerswell Road and rear of Barton Hill Road should contain criteria to ensure that the existing treed hedge bank along Kingskerswell Road is retained, and to be a landscape led scheme to retain the rural character beyond</p>	
	Mid Devon District Council (Tristan Peat on behalf of)	<p>The Local Plan should be stronger in its undertaking to provide everyone with a decent home.</p> <p>Publication of the HELAA is welcome, but the council needs to be more proactive in identifying housing sites. Torbay should work with neighbours to ensure that opportunities have been fully assessed.</p> <p>The Local Plan should explain how the chosen strategy came about and how it relates to the previous Regulation 18 Growth Options consultation.</p> <p>There will need to be technical evidence provided if Torbay intends to deviate from the standard method Local Housing Need figure. This should be open to consultation (rather than being set out in the Cabinet Report)</p> <p>MDDC reaffirm the previous comments made on the Growth options (Jan-Feb 2022 consultation).</p>	
	East Devon District Council (Matt Dickins on behalf of)	<p>There appears to be no evidence published to support the approach to housing numbers or how the proposed shortfall would be addressed and so we are unable to comment other than to reiterate points raised in the previous round of consultation that we set out below and would request you take fully into account in respect of your future work on plan making.</p> <p>The previous comments to Torbay, in respect of their past planning making work (Strategic planning Committee – 2 February 2022), read:</p>	

			<p>“In making representation on the Torbay plan consultation East Devon District Council recognise the challenges that are faced by Torbay but would highlight that these are not unusual. East Devon also has substantial landscape, environmental and biodiversity constraints as well as an extensive coastline and yet is seeking to meet its own housing needs even if this entails developing significant areas of green field land. At this stage we remain unconvinced that all options for accommodating housing development in Torbay have been fully explored. As such we consider that further work should be undertaken by Torbay before finalising any conclusions around this matter. We would encourage further discussion with Torbay and other planning authorities and in particular would stress the importance of consistency of approach to any work undertaken in respect of assessment of development options.</p> <p>With respect to specific points East Devon District Council consider that: a) should Torbay Council accept the Government methodology for calculating housing need then they should firstly, and rigorously, examine every opportunity to accommodate this provision inside Torbay boundaries. From available evidence it is not clear that this exercise has been fully undertaken to date.</p> <p>b) in exploring potential for housing development, Torbay Council should be more active in identifying suitable land for development and contact land owners to encourage them to bring forward suitable sites for development and if necessary explore options to seek to acquire land for development themselves in order to provide for housing needs.</p> <p>c) should Torbay Council regard it as appropriate to seek to accommodate Torbay growth in other planning authority areas, then they should ensure a consistent approach to any site assessment work so that like for like comparisons are secured to inform possible site selections.</p> <p>d) should Torbay Council regard it as appropriate to seek to accommodate Torbay growth in other local authority areas then account should be taken of wider than just environmental site constraints considerations. Specific account should be taken of the impacts of ‘Torbay people’ living in locations that might be remote from Torbay itself and the adverse impacts, such as increased travel (with resultant carbon emission), that could result.</p> <p>e) before seeking to accommodate Torbay growth outside of Torbay, the Government housing requirement methodology and specifically its application in Torbay should be rigorously re-examined.</p> <p>f) Torbay Council, given that it is only the housing provisions policies that are deemed out of date (and the Council are of the view that they cannot accommodate their needs) reassess whether there is merit in reviewing their local plan as a whole at this point in time to enable more options for accommodating housing needs or if there could be benefits in a later review rather than the current narrowly focused housing options review.”</p>	
		<p>Plymouth, West Devon, South Hams Joint Local Plan (Joanna Lee)</p>	<p>Support prioritising brownfield sites but have some concerns about the out of date and flawed landscape evidence.</p> <p>Housing need. The standard method is not fit for purpose in assessing local housing need at 2022. Therefore, it doesn’t follow that unmet need is 5,400 homes. Note that the government may change the SM. Any assessment should be based on post 2021 census figures and consider 10 year migration forecasts. Inwards migration on a sub-regional basis should be considered- collectively all the Devon councils may be planning for too much inwards migration.</p> <p>Clarity needed as to whether the Torbay housing growth trajectory includes small/windfall sites. These can be counted from year 4.</p>	

		<p>More Duty to Cooperate work needs to be carried out and should include the following evidence:</p> <ul style="list-style-type: none"> • updated landscape evidence within the context of the preferred Devon CC methodology and taking account of the local nature recovery strategy as it emerges. • an objective review of the HELAA discounted sites and comparative cross boundary impact, • an assessment of how any unmet need might be appropriately redistributed across the housing market areas recognising the different strengths of relationships and understanding the travel to work patterns. • consideration of most recent demographic data for Torbay, but also across Devon, understanding migration patterns and modelling trends over an up to date 10 year period • Understanding infrastructure requirements of any additional homes <p>The Joint Local Plan runs until 2034. In the short term additional unmet need could not be accommodated in the JLP area and most certainly not in the period up to 2034 which is the period the current adopted plan covers. Plymouth is affected by the government’s 35% urban uplift, so is unlikely to be able to accommodate additional need from Torbay.</p> <p>Policy SS1 Should set hard targets for tackling the climate emergency- should be more clearly aligned with the local CEAP and Devon Carbon Plan. Will need to show how the carbon from demolition and rebuilding can be addressed.</p> <p>Plan should say more about strategic scale renewables as part of SS1. Although the focus is on housing at the moment, there is a lot of rooftop PV potential within the existing built environment, and realising some of this potential aligns with the climate emergency messaging they have included within the draft at present.</p> <p>There is a clearer role for adaptation rather than just “responding” to climate change.</p> <p>Collaton St Mary – some sites SDP3a-e are close to the South Hams boundary and are on the A385 Totnes Road corridor. Sites are remote and do not represent good place making. But the imperative of meeting housing numbers is noted. Development along this corridor will inevitably add vehicles to the main A385 through Totnes, particularly the Air Quality. This needs to be properly modelled and considered in terms of transport and environmental impact</p> <p>Yalberton Developments at Yalberton/Long Road (SDP4a-c) are sensitive in landscape terms and could affect the Dart Valley/ South Devon AONB.</p> <p>South of Churston: An additional location (H2 BCG 02) to the south of the steam rail line to the south of Churston Ferrers Grammar School is close to the AONB boundary and the HELAA report recognises that it is ‘within the setting of the AONB.’ We note that this represents a first ‘incursion’ into the wider area to the south of the rail line. Without understanding the evidence on sensitivity, it is not possible to comment on the likely impacts and alternatives, and it is surprising that this evidence has not been properly renewed to inform the process of allocation. A rigorous approach should be taken that safeguards the rural setting of the AONB between the East Dart and Brixham/Paignton fringe and</p>	
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		<p>ensures the skyline is not breached. If any sites are being selected that negatively impact the AONB then there must be a high bar of robust evidence met that clearly demonstrates alternatives are not available.</p> <p>Transport and Air Quality impacts We have previously raised concerns that infrastructure impacts of sites proposed have not been properly considered in terms of Transport and DCC travel patterns and ensuring active and sustainable travel methods are put in place, rather than just planning for car use. In addition, we are concerned about the implications for education and other infrastructure and about increased impact on Totnes AQMA.</p> <p>Evidence of need for a primary occupancy policy should be provided.</p>	
	Totnes Town Council	<p>Consideration needs to be given to the planning impact and effects of more properties on neighbouring authorities. Concerns about development impact on the Air Quality Management Area on the A385 in Totnes, Berry Pomeroy and Dartington. Concern about flooding and waste water treatment capacity, including coastline impact.</p>	
	Kingswear Parish Council (Sue Balsdon, Clerk to Kingswear PC).	<p>Kingswear PC recognises the need to build more homes. The Council have concerns regarding overdevelopment and environmental harm which may conflict with local neighbourhood plans, that were directed at preserving the open countryside. New development sites must be chosen and designed to minimise greenhouse gas emissions. Green infrastructure must be conserved and extended, with added protection for sites of special value. Priority must be given to regeneration opportunities rather than to new greenfield sites. Impact on curlew bunting. Impact of light pollution on ecology and energy waste should be considered at the planning stage.</p>	
	BCG Neighbourhood Forum (Karen Kennedy)	<p>Reason for the consultation is not clearly explained.</p> <p>There has been no success in delivering the aspirations in the last 10 years. There is no explanation or action plan as to how this is being addressed. The brownfield first strategy has failed in the last 10 years. This needs to be prioritised and an effective and workable strategy put in place. The housing need in Torbay is for affordable housing in the widest sense. Building market housing with minimum (or less as is the case) affordable homes is not an appropriate strategy for Torbay.</p> <p>There is a growing inability of local wages to purchase the rising cost of local market housing, and (the council) has continually capitulated to pressure from developers to accept less than the minimum number of affordable homes.</p> <p>Agree that development in the south of Torbay/Brixham Peninsula should be resisted.</p> <p>There is a problem with Air B&B and holiday lets that need to be better regulated.</p>	
Neighbourhood and Community Bodies			
	Chelston Cockington and Livermead Community	<p>Strongly object to Broadpark Road/Broadley Drive (H2T09): agricultural land, incursion into countryside and harm to wildlife corridor. There are better brownfield options.</p>	

		Partnership (June Pierce on behalf of)	<p>Support development of Hollicombe but would object to development beyond already approved footprint (i.e. the area to the north should not be developed). Support modest development at the Grand Hotel above the garage site. Unlikely to be more than 6 homes.</p> <p>Other sites that should be included: Torre Station Storage Yard- longer term as in use as self storage. Torquay Railway Station Rowcroft Hospice. Increase density on Bancourt Hotel to e.g. 50 units.</p> <p>Make better use of brownfield sites and redevelop Torquay town centre. The need for more planning permissions is exaggerated based on the large number of major developments with planning permission and outstanding allocations in the Torbay Local Plan 2012-30 that have not been built e.g. Hollicombe.</p> <p>Prioritise brownfield sites, not greenfield ones.</p>	
		Torquay Neighbourhood Forum (Rodney Horder on behalf of)	<p>Strongly Object to Sladnor Park H2P1. Other sites in Maidencombe noted on map. I recognise the consented 2006/2008 scheme may go ahead, but any alternative must comply with Local Plan & Neighbourhood Plan Policies. The extant permission should not be regarded as a carte blanche to override the NP and LP policies.</p> <p>H2T9 - Grand Hotel garage: acceptable only if sufficient parking is provided. The Grand Hotel already has parking limitations, and removal of the garage will exacerbate the problem.</p> <p>We must do all we can to persuade Government to set targets based on planning consents (which the LPA can control) versus deliveries (which are controlled by Developers who land-bank).</p> <p>Aspirations: 2, 1, 5, 3, 4 as the better order. Make them much more concise. Condense down to our wishes rather than a lengthy justification.</p> <p>Standard Method: This does not consider topographical constraints. The economy has not expanded to the extent previously predicted. The Government must cease the top-down approach, and allow Torbay to determine its economic need, within the topographical constraints. Rural areas and Greenspaces must be protected.</p> <p>Need to avoid building homes that are beyond the reach of local people and encourage migration from Home Counties into expensive retirement apartments. This inward migration also places huge burden on provision of healthcare.</p> <p>Some development is needed in the south of Torbay but only to support the need for affordable housing. Major development in the AONB should be resisted.</p>	

			<p>Focus on town-centre Brownfield sites. With the reduction in retail space requirements, there should be opportunities to convert to residential use. Support a focus on brown field sites. Need design control of heights, scale and massing etc. in some areas e.g. Marina Car Park.</p> <p>Employment targets need to be reviewed.</p> <p>Specialist accommodation for the elderly is needed. But need to add requirement that accommodation must be in easy walking distance of hub facilities. Alternative public transport must be better than 20 minutes frequency, and run well into the evening,</p>	
		<p>Devon Wildlife Trust (Ed Parr Ferris on behalf of)</p>	<p>Detailed policy advice on how to increase protection of biodiversity.</p> <p>The Environment Act 2021 updated the NERC Act 2006 duty to demand that public authorities conserve and enhance biodiversity.</p> <p>Devon Wildlife Trust challenges all local authorities to adopt a minimum 20% Biodiversity Net Gain.</p> <p>Mitigation Hierarchy: We are concerned that this document is inconsistent in following the mitigation hierarchy, often skipping the first and most effective/important step of avoiding the impact and instead moving straight to minimise or mitigate.</p> <p>BNG must also apply to marine habitats.</p> <p>Green gaps be to be retained -not as “gaps” but as nature rich areas.</p> <p>Nature rich design should be integral to new development including Future Growth Areas.</p> <p>Full adherence to the mitigation hierarchy needs to be applied to SACs.</p> <p>Alternative provision to combined sewers needs to be provided.</p> <p>Support Aspiration 1 and Policy SS1’s desire to address climate change. Policy does not go far enough- should strive to become carbon neutral by 2030.</p> <p>Welcome commitment to resist major development in the AONB.</p> <p>Support brownfield first approach- but the biodiversity value of brownfield sites should be taken into account and should achieve biodiversity net gain.</p>	

		<p>Allocated sites may need to be reassessed to achieve BNG. Should not enjoy automation presumption in favour of approval if biodiversity is harmed.</p> <p>Object to the concept of investment zones, due to reduction in environmental safeguards</p> <p>Concerned about the expansion of port facilities at Brixham- it would be better to promote sustainable fishing techniques.</p> <p>Detailed comments are made on the SA.</p>	
	South West Coast Path. (Lorna Sherriff, SW Coast Path National Trail Officer).	<p>Concern about development at Brixham Waterfront and impact on South West Coast Path. The path and its adjacent waterfrontage should be protected and enhanced for walkers.</p>	
	Devon Archaeology Society	<p>Welcome Aspiration 4 for the built and historic environment. Support undertaking to conserve and enhance the historic environment in SH1,SHS and SPB (Brixham)</p> <p>Areas have undesignated archaeological assets – Designation should require sites to be assessed and evaluated.</p> <p>Romano British artefacts possible at H2PO3 (Preston Down Road) and H2P11 (Land North of Luscombe Lane)</p> <p>Note that detailed Historic Environment policies are to follow. These should allow public involvement and benefits from heritage discovered as part of the development process, as per existing Local Plan Policy SS10.</p>	
	Devon CPRE (Penny Mills on behalf of)	<p>Object to H2T05 Land north of Bottom Park Road- important for nature, local recreation and is an ULPA.</p>	
	Diocese of Exeter (Ed Moffatt on behalf of)	<p>The pattern of development needs to be capable of delivering and enhancing sustainability (in its social, economic and environmental dimensions, held in balance). Small brownfield sites can be relatively expensive and may struggle to support the full range of measures to ensure their social sustainability, even if their environmental impact is less than a smaller number of larger greenfield sites.</p> <p>The Plan should provide for places of worship as infrastructure.</p> <p>Strategic sites: Proportionate and appropriate community facilities and services, the need for which arises from the development, should be included in the masterplanning of strategic greenfield sites. The planning authority is encouraged to consult with relevant community infrastructure organisations and service providers (both those that are statutory consultees and those that are not) to evaluate their needs, to enable them to be able to deliver services to residents that are equivalent to the provision for existing neighbouring communities.</p>	

	Jacqueline Bennett (Bennett Leisure & Planning Ltd)	<p>Detailed comments relating to sports provision and the playing pitch strategy.</p> <p>Object to the housing allocation at Living Coasts as this is a prime site on Torquay Harbour and one that has traditionally added to the range of amenities available within this stunningly attractive and unique environment. Object to the housing allocation to the eastern end of Preston Park due to the loss of open space. This swathe of open land is an attractive break within the built up area, stretching downhill with the sea beyond.</p>	
Registered Providers/Social Enterprise Sector			
	Live West (Katie Wakefield on behalf of)	<p>The Local Plan should aspire to provide a suitable home for everyone.</p> <p>The strategy provides fewer homes than are needed (720 dpa in the HENA) and overreliance on brownfield sites will result in viability problems. This will worsen the affordable housing crisis and lead to increased house prices/ worsening affordability.</p> <p>Development should be allowed in the AONB in the south of Torbay to support affordable housing.</p> <p>Support a policy containing a primary/principal occupancy requirement that prevents new homes being used as second or holiday homes unless permission is expressly granted for holiday use. But would not support a policy that reduced the viability of affordable housing.</p> <p>Support changes to seek 30% affordable housing on all sites – would prefer 40% affordable housing if viable.</p> <p>Support lower thresholds in the AONB but may be more practical to achieve through commuted sums.</p> <p>Support the continued emphasis on shared ownership as a more accessible form of homeownership than First Homes.</p> <p>Support the provision of affordable homes in the countryside as rural exceptions sites.</p>	
Development Industry - Housebuilders/Planning Agents			
	Home Builders Federation (Mark Behrendt on behalf of)	<p>Object that the Local Plan is not seeking to meet the Standard Method local housing need. The NPPF do not consider that there is evidence to justify deviating from the standard method LHN figure.</p> <p>If Torbay is unable to achieve its needs, it must ensure that needs are met elsewhere- it cannot take a passive stance with neighbours on unmet need.</p>	

		<p>The HBF considers it unnecessary to carbon reduction measures to go beyond Building Regulations requirements/Future Homes Standard.</p> <p>The HBF are not making site specific comments, but do not consider that the AONB should be an absolute constraint to development. NPPF 177 allows for exceptional circumstances where development in the AONB can be in the public interest.</p> <p>Policy SH4 Affordable Housing The affordable housing proposals will need to be viability tested and should not require viability assessments on a site by site basis. The plan will need to be supported by a Whole Plan Viability Assessment. Paragraph 58 of the NPPF indicates that likely abnormal costs should be taken into account at Plan Making. The Local Plan should assume a high level of abnormal costs and margins in order to allow sites to come forward speedily. All policy costs should be taken into account in assessing the likely viability of Local Plan proposals. This includes the cost of biodiversity net gain.</p> <p>The impact of existing land values should be taken into account – especially on brownfield sites which are likely to have high existing use values.</p> <p>The Local Plan is proposing significantly less First Homes than required by Written Ministerial Statement. The council needs to justify why it proposes to deviate from national policy.</p> <p>Seeking affordable housing only for units above 10 dwellings. The council will need to consider the impact of this- it could help smaller developers but would harm viability on larger sites. HBF suggest that the approach is not taken forward given the uncertainties involved. (N.B. clarity on this point is needed, as this is a NPPF requirement).</p> <p>SH5 Self-Build housing in Future Growth Areas NPPF paragraph 62 requires councils to meet demand for self-build plots. There are other ways of providing self-build plots e.g. disposal of council owned land. Councils should not just off-load the responsibility onto the development industry.</p> <p>The council should have a robust understanding of supply and demand for self-build plots, windfall sites e.g. take up of plots. It can't just rely on the self-build register.</p> <p>There are practical difficulties of providing self-build plots on larger sites e.g. health and safety issues.</p> <p>SH8 Accommodation for people in need of care: Need to have regard to proposed changes to building regulations and to cost any requirements as part of the whole plan viability assessment.</p> <p>HBF consider it vital that allocations and targets are made for specialist accommodation for older people. This should be monitored. It is likely that older people would prefer to live in established areas with which they are familiar.</p>	
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	<p>Taylor Wimpey (Copperfield/ Colin Danks) on behalf of)</p>	<p>Taylor Wimpey are seeking to deliver housing at Collaton St Mary.</p> <p>Object that the proposed housing number is too low, Exceptional circumstances to deviate from the standard method have not been demonstrated. The council has not been sufficiently proactive in promoting housebuilding. There is no evidence that the Standard Method /2014 based household projections are too high. There remains a high housing need.</p> <p>Housebuilding has an economic benefit, and boosting supply will benefit the economy.</p> <p>In normal years Torbay can deliver 531dpa (based on 2018/19), which is close to the SM level. But permissions are stuck in the planning system.</p> <p>There is a need for affordable housing and constraining supply will hit people who need affordable housing most severely. It will prevent the creation of sustainable communities.</p> <p>Environmental constraints exist in other areas, and TW do not believe that Torbay has fully explored all options to meet the standard method housing need.</p> <p>The SA/SEA needs to be more transparent.</p> <p>Climate Change Taylor Wimpey support Torbay in their pursuit of a positive response to climate change. However, policy should not go beyond national requirements see NPPF152-153. Emerging policy should not undermine the Government’s technical standards set out in Part L of the Building Regulations. Any requirement should be reasonable.</p> <p>Economic recovery Housebuilding boosts the area’s economic performance. TW estimate that the economic cost of reducing building levels from 559 to 300 dpa would be: -14,452 jobs overall (-4,988 direct employment) (-3766 indirect employment) (-3,962 induced jobs) (-160 apprenticeships) - £56m per annum overall tax revenue - £5.2m per annum Council tax receipt - 1,072 affordable homes overall - £122m per annum spend in local shops -£3.7m spend on education</p> <p>If Torbay is interested in achieving economic recovery, then it is just as important to invest in house building as it is in other sectors.</p> <p>Connected and Accessible Torbay: Taylor Wimpey supports an accessible and connected Torbay. The Collaton St Mary Future Growth Area is sustainably located with access to facilities.</p>	
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		<p>Protect and enhance the natural and built environment Taylor Wimpey supports the protection and enhancement of the natural environment. Habitats Regulations and BNG requirements are set out in legislation and don't need to be duplicated in the Local Plan.</p> <p>The role of the Local Plan should be to ensure that a proper balancing exercise is carried out between ensuring social and economic needs are met (housing, affordable housing, commercial and industrial) and protecting and enhancing the environment. A positively prepared plan which is guided from the outset by a robust and transparent SEA/SA would facilitate this.</p> <p>SA/SEA: A scoping report was prepared in January 2021 but this Regulation 18 consultation does not appear to be supported by any first stage SA/ SEA for consultation? Moreover, the LPA has reached initial conclusions about its housing requirement based on environmental matters but has not presented that work in the form of an initial SA/SEA for scrutiny. As was found with the West of England JSP this approach is flawed. The SA/ SEA must evolve alongside the emerging plan and be available for consultation at each stage.</p> <p>Detailed Policy comments: SS1: Object (as above). Should present a more positive growth strategy to meet need (plus 20% buffer). Masterplans should not be used to delay development.</p> <p>Object to requirement that 25% of major sites are provided as employment -mixed use areas may not work. Sufficient dedicated employment space should be allocated in the emerging plan.</p> <p>The Council should define major development in the context of AONB policy. Not all larger scale development can be classed as 'major' in the context of the AONB.</p> <p>The policy should demonstrate Torbay responding to the requirement to allocate 10% of its housing on small sites in accordance with the NPPF</p> <p>SDP3 Collaton St Mary -More capacity work needed to show why CstM can only accommodate total of 600 dwellings. No evidence where the transit pitch would be located. More detail of community facilities is needed and why retail should be restricted in size.</p> <p>Taylor Wimpey support improvements to the A385 as a bus and cycle corridor and as part of their own proposals TW has proposed to deliver improved bus stops and cycle routes.</p> <p>Drainage and sewerage is a matter for SWW but the LPA should ensure that the statutory undertakers' AMP programmes match the housing delivery of the emerging plan and provide the necessary infrastructure accordingly and in good time.</p>	
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	<p>Savills (Dan Yeates on behalf of)</p>	<p>Land west of Long Road is promoted for development- a detailed site assessment and feasibility map is included.</p> <p>Suggest that a 20 year plan period may be more appropriate to ensure 15+ years post adoption period.</p> <p>Broadly agree with spatial strategy in SS1- strongly support allocation of Long Road, Yalberton.</p> <p>Note that need is 720 dwellings per year- everything possible should be done to seek to provide sufficient sites to address this need. All suitable site options should be reviewed and included in the plan, particularly in sustainable locations and at future growth areas.</p> <p>Support the Local Plan's aspirations. However, Aspiration 4: Boosting housing supply should be made stronger.</p> <p>Development in the AONB. This should not be ruled out in principle- sites should be assessed on a case by case basis. The Council is likely to face challenges in agreeing a suitable housing requirement given the various environmental challenges. Local Plan policies should therefore not go as far as restricting development within the setting of protected areas such as AONB's.</p>	

			<p>Investment Zones – South Devon College could be the centre for an investment Zone.</p> <p>Employment Land: Some concerns about allocation of employment at SDP4h. This should be limited to light industry (Class E(g)) and limited to the south east corner of the site.</p> <p>Infrastructure – a high priority should be given to affordable housing.</p> <p>Affordable Housing: Long Road, Yalberton is able to deliver 30% affordable house. Significant concerns about increasing rate e.g. to 40%. This will impact on viability.</p> <p>SS5 Self Build Plots: Agree to provide self-builds plots in the FGA.</p> <p>Traveller Pitches/stopping places: Strongly object to the location of pitches within Future Growth Areas. Important that pitches are brought forward in specifically designed locations to accommodate the specific use with necessary services.</p> <p>The Local Plan should be aligned with the NPPF as this is the principal statement of the government’s planning policies.</p> <p>Duty to Cooperate: It is critically important that Torbay Council work closely with neighbouring Local Planning Authorities to ensure that strategic matters can be resolved in an appropriate manner.</p>	
	Cavanna Homes (Andrew Rowe on behalf of)		<p>Collaton St Mary: Cavanna Homes support the proposed extension northwards of land at Collaton St Mary (former Bloors site, SPD3e outline permission P/2019/0281). Cavanna has assessed the site as having capacity for up to 200 dwellings in total. (100 more than the outline). Feasibility sketches are included.</p> <p>Land at Wilkins Drive, Paignton. Object to the allocation of this land as employment (SDP4(g)). The site could be used to provide housing, including affordable housing. Sufficient provision is made for employment land to the north of the area adjoining Yalberton Road (36% of the areas as opposed to a 25% requirement in the current Local Plan). There is an over provision of employment land and the site could be brought forward quickly for housing – which would assist with 3 and 5 year supply.</p> <p>Overall strategy/housing numbers:</p> <p>Object to overall housing numbers: The Local Plan should be seeking to meet the Standard Method local housing need figure of 600-720 dwellings a year. The Local Plan is proposing only half that.</p> <p>Requiring 25% employment provision on strategic sites will affect viability.</p> <p>Object to the overreliance on brownfield sites and sites with viability constraints to deliver housing. There are viability and deliverability issues which will impact on affordability. Many sites have not been built out since 2013.</p>	

		<p>There is a need for more greenfield land allocations to deliver affordable housing and to be more proactive about boosting housing numbers. Inwards migration cannot be stopped and failing to provide homes will make affordability worse.</p>	
	<p>Cavanna Homes (Elliot Jones of Planning Potential on behalf of). Comments mainly refer to Edginswell.</p>	<p>Cavanna Homes remains fully committed to delivering the Future growth Area at Edginswell, despite viability issues, engineering challenges and the Covid 19 pandemic. Cavanna Homes are committed to working collaboratively to bringing forward the area.</p> <p>Support SS1 in principle – Future Growth Areas should remain as foci for development. However, there is need for flexibility to reflect on-site abnormal costs.</p> <ul style="list-style-type: none"> - 25% provision of employment land has already been allocated at Edginswell. The existing emphasis on Kingsland for employment should be retained. - Need for more detailed evidence of employment land needs. <p>The adopted masterplan for Edginswell needs to be updated as it has shortcomings. The Masterplan does not consider topographical constraints sufficiently.</p> <p>Suggested amendments to Policy SS1 and SH1.</p> <p>SDT3 Torquay Gateway It is Cavanna’s view, having undertaken extensive detailed site analysis, that the site’s capacity should be in the region of 350 new homes. The masterplan figure of 550 homes relies on development of steep slopes, that is not viable.</p> <p>30% affordable housing may not be achievable due to viability.</p> <p>Self-build plots are not appropriate for self-build plots due to safety and coordination issues. Would be better located off-site.</p> <p>The evidence base for traveller sites needs to be updated. Pitches are usually provided as part of much larger strategic allocations or as standalone sites. Consideration should be given to making standalone allocations.</p> <p>The requirement to provide a school site at Edginswell should be reconsidered based on need and viability.</p> <p>Amended text to Policy SDT3 is provided.</p> <p>SHS- Support</p> <p>SH2 Housing Allocations in Future Growth Areas. Support in principle subject to detailed amendments noted above.</p>	

		<p>SH4 Affordable Housing – Support in principle, but needs to recognise that viability may stop 30% affordable housing being achieved on all sites.</p> <p>Concerns about a 40%-50% discount being applied to First Homes, and the impact of this on viability.</p> <p>SH5 Self Build Homes -Cavanna have concerns that self build plots cannot be accommodated at larger housing sites such as Edginswell. They should be accommodated on smaller more manageable sites. Their impact on viability should be taken into account.</p> <p>SH7 Sites for travellers -Cavanna Homes object to this policy. There is a need for an updated evidenced base. Traveller pitches are not appropriately located on relatively small Future Growth Areas. No detail is provided about management. The LPA rather than developers should identify sites away from FGAs for travellers.</p>	
	Peloton Limited (Andrew Rowe on behalf)	<p>Land at Copythorne Road is promoted for housing development for 80 dwellings. Although within the AONB, the Landscape Character Assessment indicates it as within a less sensitive landscape. Detailed site promotion information is submitted to the Local Plan.</p> <p>Object to the level of housing proposed- Will fail to meet market and affordable needs. The OAN is 600-720 dwellings a year. The Site options consultation proposes to meet only half that.</p> <p>SS1 Object to the requirement for major sites to provide 25% employment. Will make it harder to deliver housing and there is likely to be a lack of market demand for this level of employment space. The policy goes against government policy to be flexible about land uses.</p> <p>The Plan is overreliant on brownfield sites, which are difficult to deliver. More greenfield land needs to be allocated to meet the growing and pressing need for affordable housing.</p> <p>The Council need to take a much more proactive and collaborative approach to identify available, suitable, and economically viable sites, rather than seeking to resist the allocation of additional greenfield sites and taking the blanket decision to oppose all sites in the AONB. This approach will inevitably lead to planning by appeal with the council losing control of the Local Plan process.</p>	
	Pegasus Group on behalf of Gallagher Ventures (Sladnor Park)	<p>Support the allocation of Sladnor Park for housing in draft Policy SH2 given High Court decision that development has been lawfully commenced (Lawful development certificate P/2020/0315)</p> <p>Gallagher Ventures would prefer to bring forward Sladnor Park as general needs housing.</p> <p>“Unfortunate” that the level of housing growth proposed is below housing need due to environmental capacity. It is imperative that suitable/committed sites such as Sladnor park (21T064) are allocated for development.</p>	

		<p>Torbay should do all that it can to meet housing needs within its boundary.</p> <p>Removal of any sites will result in higher levels of undeliverability.</p> <p>Premature to assume that all housing sites can accommodate 25% employment space. Some sites are not suitable, and there is a need to boost housing supply. Updated evidence of employment space needs to be carried out.</p> <p>Referencing should make clear which sites are approved in principle, including in Policy SHS. Clarity is sought that Sladnor Park is allocated (approved in principle) for development.</p> <p>SH3 Object to primary occupancy policy. Will limit market competition and reduce viability. Needs to be justified by clearer evidence.</p> <p>SH4 Object: The policy should retain current Policy H2's lower rate (up to 20%) for brownfield sites in order to incentivise brownfield development. Changes to the policy will need to be supported by evidence of viability. Object to the proposed approach of seeking a higher proportion of affordable housing only on homes above the 10 dwelling threshold.</p> <p>SH5 Object: Self build policy needs to be supported by viability evidence and a clear mechanism set out whereby self-build plots would be released to the general market if not taken up by self-builders after 6 months.</p> <p>Policy C1 Countryside and the rural economy and C2 The Coastal Landscape will need to be updated to reflect that the housing allocation at Sladnor Park (and other housing allocations in H2) are permitted within the scope of the policy.</p>	
	Woodford Developments. (Mark Scoot, Maypool Estates on behalf of. Via survey)	<p>SDT - 3b (Land at Kingsland, Edginswell) - should be allocated for mixed residential and employment uses.</p> <p>The draft Policy SS1 is fundamentally flawed as it does not deliver the minimum required housing requirement. The environmental capacity is a self-imposed limitation that needs testing and review. The proposed growth level will make the chronic housing shortfall worse.</p> <p>The south of Torbay can support major growth.</p> <p>Many sites allocated in Policy SH1 have been available for a considerable period through strong market conditions without coming forward. Several of them look like wholly unrealistic aspirations from a master planning exercise with no commercial input.</p>	
	McCarthy and Stone (The Planning Bureau on behalf of).	<p>Policy SH4 – 1 dwelling threshold for affordable housing in the AONB is not supported by a viability assessment. Viability for specialist elderly persons' accommodation is more finely balanced than for general needs housing.</p>	

		<p>Specialist housing schemes such as those meeting the needs of older people should be exempt from providing First Homes, Starter Homes and Discount Market Sales on site. This is because it would not be appropriate to mix such homes into specialist housing schemes for older people which by their very nature are based around communal facilities and communal living and delivered on smaller sites usually in central locations.</p> <p>Object to SH8 The council should recognise that the proposed changes in building regulations will require all homes to be built to part M4(2) of the Building Regulations. This will remove the need to reference this in the local plan and should be removed. The council should also recognise that the requirement for accessible homes through the building regulations will introduce an extra cost for developer and should be included in the forthcoming viability study to ensure conformity with Paragraph 58 of the NPPF and that the Paragraph: 002 Reference ID: 10-002-20190509 of PPG.</p> <p>The council should also note that adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence contrary to the ethos of older persons and particularly extra care housing.</p> <p>Detailed evidence on the need for specialist accommodation for the elderly. Mayhew Report. Amend Policy SH8 to make more supportive of specialist accommodation for the elderly.</p> <p>Amend policy SH8 point 3 and 4 so they read as follows:</p> <p>3. Specialist accommodation for older people or other people will be supported where it is within easy reach of community facilities, shops, and public transport. They should be located on level sites wherever possible.</p> <p>4. New care homes and extensions to existing care will only be approved where:</p> <ul style="list-style-type: none"> (i) clear evidence of need is provided with the development proposal. (ii) they are accessible to facilities and public transport. (iii) they will not harm the creation or retention of mixed and balanced communities. (iv) they will not add undue pressure on local healthcare or social services; and (v) the accommodation leads to an improvement in the quality of care facilities provided <p>Object to health care obligations being sought from specialist housing- (See detailed text).</p> <ul style="list-style-type: none"> • Needs viability testing. • Specialist accommodation can have significant health benefits and reduce burden on social services. • Frees up general market needs in the area. • Most McCarthy and Stone residents move within a 5 mile radius. 	
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	Belstone Fox (Tim Jones on behalf of)	1-18 th holes and clubhouse of Churston Golf Course is promoted for development. Suggest that about 50 dwellings could be achieved. Clubhouse and 1-18 holes could be relocated onto the golf course.	
	Chase Sinclair (Huw Williams) on behalf of Mr and Mrs Ellis, owners of Lodge 38 at Sladnor Park)	Detailed comments about Sladnor Park. The lawful consent (P/2008/1418/PA and P/2009/0240/MRM) cannot be implemented without inclusion of Lodge 38. Mr and Mrs Ellis are not opposed to development but the fall back scheme cannot be implemented without their consent. The refused application P/2018/1053 and HELAA proforma 21T0764 does not include Lodge 38. Representation argues that it should be included as part of a development proposal under site HCT1.	
	Cushman and Wakefield (Chris Hays for) on behalf of Abacus Deeley Freed.	H2P9 – Land Rear of Local Centre, Waddeton Close, White Rock: Abacus Projects/Deeley Freed Estates fully support this proposed housing allocation. The site is suitable and available for housing delivery in the short-term and it has the capacity to provide around 100 units. Public open space needs within the original White Rock Masterplan Area (within which the site is located) have already been met and consequently there is no longer a requirement to safeguard this land to address past obligations relating to wider public open space needs. Abacus Projects/Deeley Freed Estates is in the process of working up a specific masterplan for the site which will be reflected in the submission of an outline application for residential-led development in early-2023. The emerging proposals will include high-quality public realm that will improve local connectivity and create attractive landscaping/spaces to meet placemaking objectives and provide amenity for new residents. It is envisaged that the development will deliver a range of house types comprising apartments and houses, and it will include current policy-compliant affordable housing. H2P10 – Land off Lime Kiln Close, White Rock: Abacus Projects/Deeley Freed Estates fully support this proposed housing allocation. The site is suitable and available for housing delivery in the short-term. An outline planning application has recently been submitted by Abacus Projects/Deeley Freed Estates for the development of up to 25 units comprising a mixture of two-storey homes (ref: P/2022/1173). Current policy-compliant affordable housing is proposed (25%). A permissive footway/cycleway through this site, connecting White Rock Local Centre and the approved Inglewood development, would be re-routed to offer a more direct connection. This will be considered/regulated concurrently with the outline planning application. H2 Affordable housing. Object to setting different affordable housing targets for brown and greenfield sites. Creates a disincentive to develop brownfield sites. More generally, local housing market conditions are unlikely to support affordable housing requirements above existing policy levels.	
	Adam Steward	Land at Collaton St Mary is promoted for development. 7 HA Little Clennon Pastures, South of Little Clennon Plantation.	
	K Hooper	Land at Viewpoint is promoted as a development site (although treated as a windfall in the Local Plan/HELAA.	

	Ian Powell	Land at P/2020/0302 (Pines Road, Paignton) is promoted for development.	
Private Individuals – General comments			
	Jacqueline Bennett (see also above)	Detailed comments relating to sports provision and the playing pitch strategy. Object to the housing allocation at Living Coasts as this is a prime site on Torquay Harbour and one that has traditionally added to the range of amenities available within this stunningly attractive and unique environment. I object to the housing allocation to the eastern end of Preston Park due to the loss of open space. This swathe of open land is an attractive break within the built up area, stretching downhill with the sea beyond.	
	Rob and Penny Ellis	General comments about Sladnor Park drainage, ground conditions– not an objection.	
	Chloe Bradshaw	With regards to question 15. The aspirations appear to be specific actions, it doesn't come across as though 'responding to climate change' is an overarching aspiration for the Local Plan. It may be better to word it slightly differently, for example: <i>The Torbay Local Plan's overall ambition is to respond to climate change in a way that is sustainable. The aspirations that underpin this overall ambition are: Aspiration 1: Secure economic recovery and success Aspiration 2: Protect and enhance a superb environment Aspiration 3: Create more sustainable communities and better places Aspiration 4: Achieve a better connected, accessible Torbay and essential infrastructure</i> In my opinion, the infrastructure of the Bay works well whilst there are some improvements that could be made. There are healthcare issues and a high need for affordable housing.	
Individual comments from Engagement HQ – Broadly pro-housing or promoting other sites			
	Brenda Hall	Need for more affordable housing, need for older people who are under occupying to downsize. Use Haytor Park in Plainmoor for housing, Could achieve around 12 social housing family houses in there. Just off Westhill Road, close to schools, shops etc. with ex council houses nearby. Park is underused. (N.b. site is TLGSM7).	
	Helen Harle	Need to grant more planning applications. Need for affordable housing. Better quality of urban design is needed.	
	Lisa Thomas	Future pandemics will increase the attractiveness of moving out of large cities into smaller towns and coastal areas. Support development at Gallows Gate-Eginswell. Also more development is needed around Brixham. More information is needed on holiday homes/ AirB&B. More town centre parking is needed. Measures to help people live in their own homes for as long as possible will relieve pressure on NHS /social services.	
	K E Lund	Support more housing. Should be an emphasis on affordable homes for local people. Support development at Torquay Gateway. Object to extending Future Growth Areas at Collaton St Mary. Torbay should rejoin DCC (as issues are bigger than Torbay).	
	Roy Haxby	I wish to support the proposed allocation at Archery Field in Churston ref H2BCG02 as I have friends and family in the area and there are not enough affordable homes, forcing their children to move outside of the area which cannot be right. I	

		am also surprised at the low number of homes proposed for this site as surely it could take more than double the number mentioned in the options document, meaning even more much needed affordable homes.	
	Edwin Butler	Brixham needs a substantial increase in reemployment and jobs. There are currently no jobs or affordable housing in the town. There is a need for affordable housing.	
	Tina Fowler	There is a pressing need for affordable housing. Some greenfield development is necessary to provide affordable housing.	
	A Wells	Focus development in Torquay as this has the best economic prospects. Need to match housing with new and improved infrastructure.	
	Kimberley Hutchings	There are not enough houses in Torbay for young people to get a home. This should be a higher priority than climate change for Torbay Council. Some greenfield development is needed to provide affordable housing. Should be 100% affordable housing and on the least environmentally sensitive fields.	
	Adam Davis	Prioritise housing. Need for affordable housing.	
	Rich Salmon	The south of Torbay (Churston) could accommodate more development. Need to provide more homes and affordable housing.	
	Darren Cowell	<p>Need for more affordable housing. The government needs to increase funding to help unlock sites (e.g. Edginswell). Priority is to build the right housing in the right places with amenities, infrastructure and strong sense of community. Include infrastructure as part of funding statement.</p> <p>Greater reference should be made to Passive Housing.</p> <p>The increase in numbers registering for homes demonstrate that there is a desperate need for social rent/affordable rented homes.</p> <p>The evidence base should use the 2021 Census.</p> <p>The Standard Method does not take into account market demand. Reference should be made to the roll out of new house builds in the past few years which would indicate that developers are only delivering at a market demand level, which is far below the Standard Methodology. Reference can also be made to the lack of progress on sites such as Devonshire Park and Hollicombe that are stalled sites. Additionally, sites at Collaton St Mary and Edginswell (all identified in the Local Plan as FGAs) have made little or no progress including the site subject to LRF funding. All of this suggests the Standard Methodology is deeply flawed and has provided the developers the opportunity to exploit a low land supply figure and drive ahead with unwanted sites such as Inglewood.</p> <p>Refer to “the sea” as reference to the Marine SAC may be confusing.</p>	

		<p>Many sites are not attractive to developers due to the costs of developing difficult sites.</p> <p>Agree that development in the south of Torbay should be resisted.</p> <p>We need to be bold and brave and in particular develop brownfield sites at height! Edginswell could lend itself to higher buildings as they would follow the contours of steep hills. Victoria Square and Union Square could accommodate key worker accommodation, retirement housing and young families, if they are well designed. A mixed demographic in these buildings would lead to stronger communities.</p> <p>Refine term “Waterfront” to avoid it referring to inappropriate (undeveloped or rural) prime seafront areas.</p> <p>Cadewell Lane sites will require great early engagement. While the garage sites are an eyesore, the community has rightly raised significant concerns about overdevelopment and parking.</p> <p>Sandringham Gardens. Object as this appears to be part of a local greenspace PLGS23</p> <p>The main need for affordable housing in Torbay is social rent. Two thirds of the affordable housing mix should be for social rent. If sites are developed in the AONB they should be a minimum of 50% social rent.</p>	
	C Harrison	<p>You need to be bolder and build more homes on greenfield sites. There is a housing shortage, local people cannot access or afford homes.</p> <p>Too much emphasis is placed on the AONB and Conservation areas. We are surrounded by green fields. Housing is more important. There are lots of green fields that need to be built on to meet housing need. There is a housing crisis, local people need affordable housing.</p> <p>There should be greater emphasis on social rented housing.</p>	
	Danielle Carter	<p>The Parkfield site (Paignton) could be redeveloped. It is unused and falling into disrepair.</p>	
	Nigel Brown	<p>300 dwellings a year should be the maximum. Parkfield could be redeveloped.</p>	
	M Simcox	<p>Tax underoccupancy (2+spare bedrooms) at 10x council tax.</p> <p>Easterfield BMX track, Torquay golf course, Long Road should be considered as additional housing sites.</p> <p>Oppose high building – harm to birds.</p> <p>Other options for brownfield housing include: Old Paignton hospital in Church Street. Old Court House in Union St. All closed down care homes that failed CQC ratings. Hotels up for sale can be bought and renovated.</p>	
	Dolton Consulting (Alun Paul Dolton)	<p>We need to look at maximizing development opportunities in the urban core areas in conjunction with upgrades to robust low-carbon infrastructure. We have a study that demonstrates such an approach.</p>	

		<p>Need to create places where people want to live within the urban centres, high-quality, decent-sized apartments where it is not essential to own a car, we are addressing all of the above.</p> <p>The former Baileys Hotel and Gerston Hotel at Station Square, Victoria Square and Station Lane in Paignton could be redeveloped as taller buildings.</p> <p>Development around Edginswell Station site could provide mixed use employment and housing.</p> <p>Restore a rail link to Brixham.</p>	
	Robert Harper	BMX bike field at Easterbrook Lane could be used for housing.	
	Jill Perring	Areas like Lucius Street could be reused for housing. Agree with the need to address Climate Change, but it may not be Torbay's highest priority at present. However, all new housing should have solar panels	
	Clare Lawrence	Some development should be allowed in the AONB to provide affordable housing and employment.	
	Andrew Kniveton	<p>Need to regenerate and improve town centres.</p> <p>Families need proper family housing with gardens etc we should not just shoehorn in as many houses as we can. High density sites like Torre Marine contain too many houses and too many cars parked on pavements. We should be proud of our new developments and make them desirable places to live, not ghettos for the future.</p> <p>Affordable housing should be available on all sites including the AONB at the same percentage, otherwise you will end up with all affordable housing in the same area's. Property developers will always build poorer quality housing for affordable properties. What is affordable to one person is not to the next: we should prioritise quality housing that's rented at a price people can pay.</p> <p>All councils in Devon should work together to find suitable sites for larger housing developments and all contribute to costings.</p>	
Private Individuals – Generally opposed to greenfield development.			
		<p>General concerns about the impact of more housing: inadequate infrastructure, environmental capacity, lack of need, new homes are not affordable for local people, focus on brownfield regeneration, town centres and limit new homes to affordable housing for local people: (Note that most comments express general support for affordable housing, but not boosting overall housing numbers to achieve this).</p> <p>Mark Clayson, Ian Cairn, Elizabeth Snelson, Sandra Martin, Rachel Buffery, Jonathan Collinge, Victoria Smith, Claire Scarrott, Paul Brown, Nikki Massie, Ulrike Gerhardt, Sally White, Terry Collins, P. Dijkshoorn, Mary Ross, Paul Butcher, Chris Wood, Kelly Smith, A Wells, Jeff Clarke, Marcia Bridge, Kate Graeme-Cook, Garry Wedderburn, Darren Addams(?),</p>	

		J N Palmer, Steven Ward, Stephen Bridge, Victoria Taylor, L Dransfield, Andy Perrin, Angela Robson, Pat Kerswell, Ann Ashworth, Stephen Dransfield, John Boyne, Derek Burtenshaw, Jennifer Walter, C Davies, Francesca Bahoum, M Simcox, Janet Coles, Robert Frost, Stuart Wilson, Nigel Brown, Ian Sharratt, G Fisher, M B Edwards, Sean Stroud, M Brooks, Peter Ford-Evans, Karl Grafton, Nigel Goodman, Lauren Derosa, Georgina Henley, Kevan Davey, Malcolm J Turner, Teresa Buckley, Felicity Good, Felicity Good, Kevin Dudman, Simon Truscott, Gareth Clarke, Carole Hart, Francesca Bahoum, Suzy Robinson, Jason Housecroft	
	Kris German	The proposed number of homes is not achievable whatsoever. I am a landlord that rents to Torbay Council and it takes months and months to sort a single dwelling. I am also a developer and I can tell you that 100% you will not be building that many homes. You really need to have more realistic expectations and teams accountable for when goals aren't met. Material shortages, labour shortages, Lending issues - these will all affect the number of homes being built. Government can give you whatever target they wish to put on paper, but coming back to the real world there needs to be more realistic targets.	
	Tim Nand-Lal	There is limited available land in Torbay. Development should be considered on green fields in Teignbridge and South Hams areas that border Torbay, as these authorities have more available green space.	
	Martin Potten	Neighbouring authorities have an abundance of land to develop. It is stupid to try and cram more housing in such a small area as Torbay. Better to amalgamate Torbay with another authority, or you might as well build out at sea. Increase the % of affordable housing.	
	Dee Parnell	Prioritise brownfield sites e.g. Bancourt Hotel, Sheddon Hall Hotel.	
	Maggie Slevin	Too many retirement developments- there should be more family accommodation.	
	Katya Maddison	Protect tourism, heritage and historic environment. Make better use of existing buildings. Provide fiscal incentives to increase the amount of available accommodation e.g. lower council tax for letting out rooms.	
	Anna Rowan Duncan	<p>Need to promote economic recovery</p> <p>Need to have policies to prevent land-banking.</p> <p>It's impossible to have developers profiting from building houses that meet demand and to protect the environment. The two aims are incompatible. Could greenfield sites be allocated only for social housing? The sacrifice of green space is far too great when the outcome is merely profit for volume housebuilders.</p> <p>Only brownfield sites and agricultural (mainly arable land) of minimal ecological value should be considered for development. Torbay would do better to fight off government targets and work on encouraging more efficient use of existing housing stock - incentives for multi-generational homes, for empty-nesters to downsize, aggressive compulsory purchase of empty properties and banked land.</p> <p>Support primary occupancy and self-build policies.</p>	

		HMOs- HMOs are all that many people can afford. We need more of them. We just need them to be safer and nicer. Restricting them just leaves more people homeless. Poorer areas are the areas where you can live without a car, so forcing poor people out just makes the problems worse.	
	James Gordon	Treat Waterfronts separately from town centres. Support brownfield development, but only low-rise on waterfronts. Some development should be allowed in Brixham, but only to support local needs affordable housing.	
	R Hinxman	It is fine to have aspirations, but my concern is how they are translated into actions that enable them to be met. Arguably the aspirations as outlined ought to be ones the Council and Torbay's inhabitants and visitors already hold and pursue but there is scant evidence over recent decades that the quality of life of its population has been especially enhanced. Better employment opportunities are needed.	
	Sean Stroud	Use more Empty Dwelling Management Orders (EDMOs) to bring empty homes back into use.	
	Paul Corocan	This is a difficult survey to answer as it is wide ranging. I appreciate it is difficult to educate about these issues. So more access to linked, smaller bite sized articles spread across different social media, perhaps with an interactive element might improve the overall response and quality of engagement with surveys like this one - and help disseminate what's actually in the Local Plan.	
	Nigel Vernon Goodman	The Government has indicated that it plans to abolish the 'standard method' to determine housing targets and move to an LPA-assessed target based on 'need and demand', and take into account physical and environmental constraints to determine that target, and also that any proposal must have Community Consent. Torbay has set a target of circa 300/yr. This is a more realistic number than the Standard Method approach, but I question whether this is still an overestimate, at least for the foreseeable (4-6+yrs) given the country's and our local economic situation, but may still be too much. Object to Sladnor Park H2T1. Some windfall in Maidencombe is possible HMOs do not help regenerate urban areas. Traveller sites should be limited to two. More detailed technical comments on the Standards Method and its shortcomings.	
	Samuel Fellows	Please tell me how you link Climate Crisis with building more houses? You can't because there is no link, if anything that could make it worse as you will be contributing more CO2 in the building of these new houses. Also, "affordable" is a buzz word, unless linked to a concrete value of how much it would take to buy these homes. Develop houses instead of hotels. The housing proposals need to be specific.	
	Rachel Cooper	Increase provision of walking and cycling. Reduce car reliant housing developments.	
	Michael Ellis	What is to stop the new Local Plan being torn up to ignore locals' wishes?	

	Michael Broadway	There are enough homes now in the bay. More houses mean more cars and pressure on resources.	
	Jane Wilks-Schaedl	Increase tree planning to combat climate change	
	Thelma Winter	Object to building on greenfield sites. Any AONB (land) needs to be untouchable.	
	June Pierce	Brownfield sites have not been developed e.g. Hatfield Cross and Brookfield Place, Preston	
	Stephen Leslie Duncan	The Local Plan needs to respect tourism and the built historic environment. Torbay needs to preserve what makes the area special. Object to building on greenfield sites (H2P01,H2P02, H2P03) Support Hollicombe Gas Works (H2T29) and Palace Hotel (H2T19) as well as town centre regeneration proposals e.g. Victoria Square. Redevelop commercial property for housing e.g. former Helibeds on Lymington Road.	
	Becky Fowlds	Recent planning decisions from the Inspectorate have emphasised that environmental harm decisively outweighs the delivery of housing. See decisions APP 3298503 and 3273240.	
	Steve Turner	It should not be presumed that because some sites have no formal landscape designation, that new housing will not cause harm and can therefore automatically be accommodated. Environmental capacity will always be finite, irrespective of housing need.	
	Tracey Woolcock	The main need is for affordable housing- housebuilders should not be able to tweak the affordable housing numbers down.	
Site Specific Objections (Note that these are in addition to map pins). Objectors did not always clearly state the site they were objecting to, although it is generally clear from the context which broad area they are concerned about.			
	H2T06	Sladnor Park: Landscape impact, flooding, ecology, traffic issues, unsustainable location. Kerrin Lyons, Henry Francis Naudi, Nigel Vernon Goodman	
	H2T02	Brunel Manor - Henry Francis Naudi. A housing development at Brunel Manor (H2T02) would deprive Torquay of a historical site bounded by well-established woodlands. It is also a recreational area very much valued and used by local residents. It is also a well-established habitat for flora and fauna. Such a valuable historical area should be preserved for current and future residents to enjoy. Development of the building as a hotel for tourist purposes in Torbay would in my view be much more appropriate.	
	H2T02, H2T05	Land off Kingskerswell Road and north of Bottom Park Road. 39 Objections. Impact on wildlife (wide range of birds and other wildlife noted). Flooding, water run-off, lack of infrastructure- highways, surgeries.	
		Karl Grafton, Tracey Lawrence, Paul Corcoran, Leanne Howorth, Kim Hooper, Steve and Debbie Honeywill, Trevor Betts, Sarah McMullan, Jon Smale, Barry and Tanya Welch, Lesley Cambridge, Mary Garland, Nancy Deakin, Barry Cook, Naomi Mahady, Lou Vassie, Ross Young, Justine Ives, Pascale Schollar, Leanne Howorth, Paul Bailey, Mr and Mrs	

		Baggley, Michael Stevens, Trevor Betts, Peter Rees, Karl Grafton, Paul Corcoran, Martin Brook Tracey Lawrence, Teresa Buckley, Maureen Garland, Albert Banan, Lee Daniel, Laura Daniel, James Stanley, Laura McGregor	
	H2T09	<p>Broadpark Road/ Broadley Drive H2T09: Approx 221 Objections: Harm to wildlife and wildlife corridor between Scadson Woods and Manscombe Woods, Loss of agricultural land - impact on food security, harm to adjoining woodlands, Traffic impact – including impact on the school, poor accessibility of the site, brownfield land should be prioritised, Hollicombe Gas Works has not been built out despite having permission for 185 dwellings, loss of recreation area, contrary to the Neighbourhood Plan, impact on Cockington (and setting of heritage assets), poor infrastructure, poor medical facilities in Torbay (GP surgeries and NHS dentists), flooding issues.</p> <p>Lesley Newton, Clive and Lisa Scourfield, Joanna Carter, Daphne Potts, Robert Gwyne, Doug Fanning, Martin Read, Andrew Gibbs, Malcolm Swift, Dianne Swift, Stephanie Crispin, Lesley Jeakings, Margaret Newman, Paul and Ann Spooner, Alison Reed, Glynn Reed, Angela and Helen Booth, Mrs Sonia Sanders, Mr & Mrs Winn, Martin Newey, Peter & Linda SnowToby Lagden, Lizzi and Craig Vooght, Mrs A Y Campbell, Mr M Arthur, Marian and Robert Pattison, David F. Searle, Belinda Franks, Wendy Houlihan, Helen Wighton, David and Julie Jamieson, L Boroski, David Northway, Mr. Neil Stanlake, Carol Stanlake, John Wright, Geoffrey Purser, Gillian Cook, Alison Robinson, Margaret Cooke, Giustina Matassa, Andrew Stockman, Robert Short, R W & C J Seaton, Mrs Janet Bamsey and Mr Colin Egan, Sandra Florence, Martin and Sharon Wright, Phyllis & William Bagwell), Richard Thorpe, Peter Cliff, David Buckpit, Ed Hargrave, Tom Atwill, Alan and Tracy Lyon, Susan Evitts, Geoff Holland, Keith Harrison, Lynne Nand-Lal, David Ives, Martin Read, Chris Dainton, Helen Read, Shelagh Newey, Mr and Mrs P Matassa, John B Cook, Sue and Colin Briggs, Pauline Sharpe, A E Evans, J Davies, Ray Drury, June Pierce, Mary Taylor, Margaret Smith, C A and M A Franks, Ian Lane, Dr Patrick Roberts, Maureen Glynn, Carol and Gary Collins, Dennis Hext, Bryn Leonard, Peter and Trudie Cross, Mr and Mrs J Traynor, P Ramsden, David John Sanders, Nicole Amil, Elizabeth Ann & John Edward Perry, David Crabb, Caroline Coker, Betty Holt, Peter and Carolle Green, Audrey, Keenan, Paul Cunnell, Alan Warwick, Erica Warwick, Michel Thomas, Margaret Butler, Robert Tucker, Geoff Thompson, Anne and Adam Krasnopolski, Richard White, David Newton, Bill and Sally Johnston, Joanna Gawn, David Jones, Jack Critchlow, Mr. M. Singleton-Green, Yvonne Poppett, Karen Frissen, Claire Labdon, Arthen Davies, Guy Tucker, Chris Dymond, Sarah Bird, Martin Ives, Karen Bateman, Jill Smallshaw, Mr Surajit Sinha, Jon Oliver, Mr Phil Hesketh, Lynn Hesketh, Maria Muzaffer, Dr Judith Keane, Graham Massie, Mark Pillar, Mrs Pauline Dingley, Sheila Morley, Margaret Pye, Louise Simmons, Chris Labdon, Kathleen Swan, Jean Powney, Dawn White, Phyllis Redwood, Andy Smallshaw, Mark Steven Dingley, Jackie Dicks, Carolyn Perrett, Myra Oribine, Michael Melville, Anthony Berry, Rosemary Johnson, Michael Gurney, Rosalind Gurney, Dr Aabha Sharma, Samantha Bowen, Paul Edwards, Mr Peter Drummond Bowen, Beryl Booth, Mrs W A Seldon, Jacquelin Keen, M Aiste(?), R A Matthews, Christine Anne, Crapnell, Peter Boland, Jim Dicks, Julie Kennard and Neill Metcalfe, Jessica Leslie, Kirk Bailey, Kate Maud, Paul Tout, Kevin Meredith, Kingsley Woods, Jonathan Smale, Nicholas Rowe, Warren Sanders, Lisa Sanders, Michael Watts, Christine Raymond, Becky Fowlds, Steve Turner, Rosalind Turner, Michael Atkinson, Julie & James Corner, Yvonne Hayward, Julian Chandler, Mr T and L Godfrey, Robin and Joanne Waymouth, Yvonne Wiggins, Lesley Newton, Julia Poole, E A Pring, M J Tonkin</p>	
	TCRT02	Union Square (object to loss of shops)- Paul Westwood	

	TCRT16	Former Debenhams, Strand- Sam Cane	
	TCRT19	Imperial Hotel Ken Wenman. Will not be for local people. Taller buildings would be a disaster for the historic environment.	
	H2P01	Sandringham Gardens (West of Preston Down Road). 106 objections. Loss or recreation area, land is covenanted (1925) for access and use by the people of Paignton, urban sprawl. The Plan should focus on brownfield sites, lack of infrastructure, traffic impact, wildlife harm. Cllr Chris Lewis, Cllr Barbara Lewis, Georgina Uren, Matt Woodmore, Lorraine Cunningham, Tia Wright, Valerie Clarke, Rebecca Hawkey, Rosemary Roberts, Mike Ford, Anna Reynolds, John Pitts, Rob Boothroyd, Lindsey Boothroyd, Anne Marie Ostler, Mrs M Goss, Ms T Collins, Clive and Lisa Scourfield, B S and S M Eggleton, Louise Grant, Jess Lane, Rachel Veale, Karen Burnett, Laline Knight, Carol Lawson Fiona Stevenson, Sarah Williams, Richard Shore, Mrs S Swift, Terena Cottell, Shaun Ellis, Pam Fraser, Jane Elizabeth Mary Wilks-Schaedl, L Veale, Richard and Debra Barton, Gemma Rundle, Helen Wighton Diane Spalding, Mark Emberson, M & G Stevens, Allen Johnson, David Schaedl, Christina Rabbich, "Lee", Caz Ladbrook, Susan Gay, L P Hutton, P Fortune, Penelope Rice, Mr and Mrs Widdas, Victoria Langley, Diane Spalding, "Welch", Becky Fowlds, Mike Atkinson, Michael Atkinson, C J Lander, Becky Lee, Mr & Mrs Bunt, Amanda Luscombe, Micheline Haslam, Nikki Futrell, Ryan Biercewicz, Paul and Lynne Murch, Paul Merch, Gary McKay, Carl Nelson, Debra Nelson, Mark Wilkins, Nichola Jackson, Julia Hopkins, Sally Thomas, Mr and Mrs A Hill, Craig McMahon, Tom Murch, ., Holly Jackson, Beth Atkinson, Jill Atkinson, Caroline Saunders, Fiona Gibling, Jade Smerdon, Susan Platt, Robert Tame, Andrew Diggines, Paul Rickerby, Dawn Higby, Kevan Davey, Bethany Cooke, Carrie De Rosa, Albert Banan, Kevin Dudman	
	H2P02/H2P03	Preston Down Road (Note that some of these representations may refer to Sandringham Gardens (H2P01) Louise Grant, Jess Lane, Lizzie Moore, Pam Fraser, Jane Elizabeth Mary Wilks-Schaedl, Amanda Luscombe, Nikki Futrell, Diane Putnam, Michael Bullock, Lee Knowles, Matthew Woodmore.	
	H2P8	Grange Road Claudia Harrington	
	H2P10	Limekiln Close , land at White Rock 1 (public right of way issues); Terry Graham-Watson	
	SDP3	Collaton St Mary D Masters, Margaret Collins, T Nand-Lal	
	21B001 and 21B005	Gliddons Garage and Archery Field , Judith Lesser, Felicity Good	
	H2GB01	Wall Park Extension. Harm to SAC and AONB- G Fisher	
	TCRB01	Middle Street Brixham. There is no space to build houses in Brixham Town Centre, parking issues. Regional planning is needed. Torbay is too localised to plan for strategically: Suzy Robinson M B Edwards, M Brooks	
	H2B06	St Marys Dairy buildings - Kate Graeme-Cook	

Appendix 4 Key Messages from the Housing Strategy Consultation.

The Housing Strategy consultation ran concurrently with the Local Plan Housing Site Options Consultation in October- December 2022. 186 people took part in the main survey (58% female, 38% male), from which we received 292 comments and suggestions. The majority of respondents (79%) were over 45 years of age, 74% owned their own home, 12% rented privately and 8% rented from a social landlord. The remaining 6% were either in temporary accommodation or staying with friends/family.

The online survey results generally demonstrate an endorsement of the Strategy's three priorities and the three cross-cutting principles. The Percentage of respondents who 'strongly agree and agree' for each priority and principle was as follows:

1. Improve housing supply 71%
2. Improve housing quality 84%
3. Improve housing support 69%
4. Put the customer first 76%
5. Tackle climate change 65%
6. Work in partnership 64%

More detailed comments were made on the following points.

Topic	Count	%
1 Develop on brownfield land, reduce the number of empty homes and curb the use of second homes	73	25%
2 Develop more affordable homes	31	11%
3 Homes should go to local households	29	10%
4 Preserve open countryside and green fields	28	10%
5 Prevent homelessness and address rough sleeping, particularly in town	23	8%
6 Help landlords and help tenants in private rented accommodation	23	8%

7 New homes require more infrastructure, like roads, NHS, schools, cycling, public transport etc	21	7%
8 Other: topics related to other Council functions	20	7%
9 Tackle conditions in the housing stock, both private and social	15	5%
10 Improve the design of new homes, including energy efficiency and parking	10	3%
Housing is unaffordable	8	3%
More eco and environmental measures, such as insulation, solar power etc	6	2%
Less luxury market homes and more for first time buyers	3	1%
More homes, including extra care for those with a disability	2	1%
Total	292	100%