

TORBAY LOCAL PLAN

A landscape for success:

The Plan for Torbay – 2012 to 2032 and beyond

PROPOSED SUBMISSION PLAN (FEBRUARY 2014).

TORBAY COUNCIL RESPONSE TO REPRESENTATIONS ON PROPOSED REPLACEMENT ADDITIONAL MODIFICATIONS TO THE SUBMISSION LOCAL PLAN

REPRESENTATIONS BY REPLACEMENT ADDITIONAL MODIFICATION/POLICY NUMBER

Torbay Council – 14 August 2015

Explanatory note: Torbay Council Response to Representations on the Proposed Replacement Additional Modifications to the Submission Local Plan

Summary of this document

This document sets out the Council's comments on the consultation responses to the Proposed Replacement Additional Modifications (RAMs) to the Torbay Local Plan 2012-32 and beyond "A landscape for success". These were the subject of public consultation between Monday 22nd June and Monday 3rd August.

The Replacement Additional Modifications cover matters that are not considered to go to the heart of the Local Plan's soundness,. They clarify or expand on matters that were already addressed in the Submission Version of the Local Plan or are explanatory text to issues considered in the Main Modifications. They also update the Plan to be consistent with revised Government guidance etc. As such, changes to Additional Modifications are made at the Council's discretion.

The Replacement Additional Modifications replaced the earlier Additional Modifications that were published for consultation between Monday 9th February and Monday 23rd March 2015.

This document lists representations in order of Replacement Additional Modification, and the Council's proposed responses to them.

A separate schedule lists persons /organizations that have made representations to the Replacement Additional Modifications to the Plan.

These schedules should be read in conjunction with the Council's response to changes to the Replacement Main Modifications (RMMs). Replacement Main Modifications cover matters that are considered central to the Local Plan's overall strategy and soundness. The Schedules of responses to the Replacement Main Modifications therefore consider the strategic matters arising in more detail. The Inspector examining the Local Plan will reach a view on the Replacement Main Modifications in his final report.

The Council has produced a separate summary of recommended further modifications that it considers are appropriate to make in response to the representations received on the Replacement Modifications. These are highlighted **yellow** in the table below and summarised in a separate Schedule of Recommended Further Modifications. These further changes are all minor editorial matters. On this basis they are not considered to raise additional issues requiring further Sustainability Appraisal, Habitats Regulations Assessment or Equalities Impact Assessment.

Replacement Additional Modification	Local Plan policy/para	Person/Organisation	Summary of Representation	LPA Response
RAM1	all	No representations		
RAM2	1.1.3	Roger Bristow (428525) Object	Objection in context of SS1/RMM1 objection	Paragraph 1.1.3 records historic trends and no change to it is required.
RAM3	1.1.5	No representations		
RAM4	1.1.8	Paignton Neighbourhood Forum (704914) Roger Bristow (428525) Steve Sherren (429416) Frank Seear (923435) Susan Swan (900020) Jeremy and Tracey Fatz (899233) Susan Miller (923426) Object	Objection to assessment of land availability in context of objections to Replacement Main Modifications.	See representations on RMMs. This paragraph relates to assessment of likely capacity in the 2013 SHLAA. This assessment remains relevant, although the reduced Plan period means that 9,200 dwellings is higher than proposed in the Replacement Modifications.
RAM5	1.1.15	Paignton Neighbourhood Forum (704914) Roger Bristow (428525) Steve Sherren (429416) Dr Helen Boyles (429431) Kevin Wright () Frank Seear (923435) Susan Swan (900020) Susan Miller (923426) Jeremy and Tracey Fatz (899233) Object	Add text to note that an oversupply of homes will require a downwards revision in housing numbers.	RAM177 (section 7.5) indicates that a downward revision in figures may be appropriate if there is evidence of oversupply etc. Whilst not essential to the Plan's soundness, the Council would not object to amending 1.1.15 to note a possible downwards review: Recommended Further Additional Modification to paragraph 1.1.5 e.g. other solutions to allocating more land are likely to be appropriate. Conversely, there may be a case to reduce growth rates if there is evidence of oversupply against objectively assessed need and demand.
RAM6	2.1.2	No representations		
RAM7	2.2.5	No representations		

RAM8	2.2.9	No representations		
RAM9	2.2.11	No representations		
RAM10	2.2.13	Paignton Neighbourhood Forum (704914) Roger Bristow (428525) Steve Sherren (429416) Dr Helen Boyles (429431) Kevin Wright (900047) Frank Seear (923435) Susan Swan (900020) Susan Miller (923426) Jeremy and Tracey Fatz (899233) Object	The 2012 based Household Projections for 2012- 3031 come to 7,900 new households based on calendar years (not 7,550).	The Local Plan figure of 7550 households is correct based on calendar years. Paignton Neighbourhood Forum has adjusted the HH figure to reflect financial years, which is also correct. Other representations appear to be collateral to objections to the Local Plan's overall growth strategy.
RAM11	2.3.1	No representations		
RAM12	Aspiration 1	No representations		
RAM13	Aspiration 3	No representations		
RAM14	Aspiration 5	No representations		
RAM15	4.1.11	No representations		
RAM16	Picture 4.1 Key Diagram	Paignton Neighbourhood Forum (704914) Roger Bristow (428525) Object	Indicate that lines on the key Diagram are indicative.	PNF's comment does not relate to a Modification. Key Diagrams are by definition indicative.
RAM17	4.1.20	Paignton Neighbourhood Forum (704914) Roger Bristow (428525) Object	Where mitigation measures are proposed, they will need to prove that they are deliverable, and mitigate the impact of development in perpetuity (c.f. Paignton Neighbourhood Forum's representations on RMM3).	The additional text at 4.1.20 indicates that the mitigation strategy should be implemented. Mitigation is also covered in Policies SS8 and NC1 which set out clear requirements on development. However the Council consider that it is appropriate to state that mitigation of impacts on the SAC should be in perpetuity. Recommended Further Additional Modification to paragraph 4.1.20 In accordance with Policies SS8 and NC1 (below) these should show how any adverse impacts of development are capable of being mitigated in perpetuity.

RAM18	4.1.21	No representations		
RAM19	4.1.32	Natural England (400188) General observation	A minor amendment is recommended in response to Natural England's comments at RAM34	Recommended Further Additional Modification: Add to the end of paragraph 4.1.32 "This is available on the Local Plan website (Appendix B and Addendum to Local Plan Library Document SD/26).
RAM20	SS3	No representations		
RAM21	4.1.36	No representations		
RAM22	4.2.20	No representations		
RAM23	SS5	No representations		
RAM24	4.2.26	No representations		
RAM25	4.2.27	South Devon College 440790 (GVA Planning On behalf of: 847471)	Support	Support welcomed.
RAM26	4.3.17	No representations		
RAM27	4.3.18	No representations		
RAM28	4.3.23	No representations		
RAM29	SS7	No representations		
RAM30	4.3.27	No representations		
RAM31	4.3.29	No representations		
RAM32	4.3.34	No representations		
RAM33	4.4.3	No representations		
RAM34	SS8	Natural England (400188) Support	Support RAMs. As the HRA Site Appraisal Report of Torbay Local Plan Strategic Delivery Areas (Proposed Submission Plan) 2014 sets out the fundamental mitigation for the strategic growth areas, we advise the Local Plan could be improved by making this document an additional appendix to the Plan.	The HRA Site Appraisal Report of Torbay Local Plan Strategic Delivery Areas (Proposed Submission Plan) 2014 is referred to at paragraph 4.1.32 (RAM19) and is available as an online resource on the Torbay Council website (SD/26/Appendix B and Addendum). Text has been added at Paragraph 4.1.32 (see RAM19 above) to refer to this.
RAM35	4.4.6	No representations		

RAM36	4.4.7	No representations		
RAM37	4.4.9	No representations		
RAM38	SS8.1/HE1	No representations		
RAM39	SS8.1/HE1	No representations		
RAM40	6.3.3.1	No representations		
RAM41	6.3.3.11	No representations		
RAM42	SS9	No representations		
RAM43	4.4.13	No representations		
RAM44	4.4.15	No representations		
RAM45	4.5.12	No representations		
RAM46	4.5.13	No representations		
RAM47	4.5.14	No representations		
RAM48	4.5.25	No representations		
RAM49	4.5.26	No representations		
RAM50	SS10	No representations		
RAM51	4.5.30	No representations		
RAM52	4.5.32	No representations		
RAM53	SS11	No representations		
RAM54	4.5.34	Home Builders Federation (844154) Object	Object that assessment of objectively assessed need has not considered hidden homelessness or vacant properties.	This matter is discussed in relation to the HBF's objection to RMM1/SS1 and other Main Modifications. The Housing Requirements Report has considered the Housing Register as a measure of hidden homelessness. The Local Plan seeks to exceed the 2012 Household Projection figure.
RAM55	4.5.38	No representations		
RAM56	4.6.17	No representations		
RAM57	SDT1	No representations		
RAM58	5.1.1	No representations		
RAM59	5.1.3	No representations		
RAM60	5.1.4	No representations		
RAM61	Table 5.2	Maidencombe Residents Association (900169)	Remove specific reference to Sladnor Park from Table 5.2.	Sladnor Park has been removed from RMM9/RMM14 (although the developer has objected to its removal). Specific reference to it should be removed from Table 5.2 as an editorial matter.

				Recommend Further Additional Modification (to provide consistency with RMM14): Remove reference to Sladnor Park in Table 5.2
RAM62	SDT2	No representations		
RAM63	5.1.1.1.	No representations		
RAM64	SDT3	Specific objections to the Gateway Future Growth Area are dealt with in the Schedule of RMMs.		
RAM65	5.1.2.2	No representations		
RAM66	Table 5.5	No representations		
RAM67	SDP1	Objections to Paignton's overall growth strategy are coded under RMM1		
RAM68	5.2.2	No representations		
RAM69	5.2.5	No representations		
RAM 69A	5.2.1.3	No representations		
RAM70	SDP3	Objections to Collaton St Mary are coded under RMM11.		
RAM71	5.2.2.1	No representations		
RAM72	5.2.2.5	No representations		
RAM73	5.2.2.7	No representations		
RAM74	5.2.2.10	Paignton Neighbourhood Forum (704914) Roger Bristow (428525) Steve Sherren (429416) Dr Helen Boyles (429431) Kevin Wright (900047) Frank Seear (923435) Jeremy and Tracey Fatz ((899233)) Susan Swan (900020) Susan Miller (923426) Object	Object to reduction in % of employment at Yalberton Road to below 50%. This should be treated as a RMM. The site is also affected by foul drainage issues. Other objections are in the context of objections to the overall growth strategy (see RMM1).	General matters: RAM74 relates to employment proportions rather than drainage (See Schedules of RMM1 for more discussion on drainage matters). Drainage and other site specific matters are currently under consideration as part of planning application P/2014/0983. Employment Land: It is noted that PNF (and others) consider that this should be treated as a Main Modification. The Council has no objection to the Inspector dealing with the matter in his Report. However, for the reasons set out below, the Council considers that

			<p>RAM74 is an additional modification that will help deliver a mixed use development on the Yalberton Road site, and is consistent with NPPF paragraph 22.</p> <p>The Council considers that retaining 25% employment requirement at Yalberton Road RAM74) is more likely to enable viable development and allows for other community benefits such as affordable housing, than would requiring a higher proportion of employment land.</p> <p>This will also make the approach taken at Yalberton Road consistent with Devonshire Park (Bookhams), which although a brownfield site was last used as employment land. (The 1ha identified in Table 5.11 for Bookhams represents 25% of the site).</p> <p>The rear part of Yalberton Road (“The Jackson Land”) is the subject of a current planning application (P/2014/0983), which identifies a larger development area (10.6ha) than the 7.4ha of developable land identified in the Employment Land Review and emerging Local Plan. Therefore table 5.11 may need updating as an editorial matter, when the application is determined.</p> <p>The Council notes that the 3.7ha identified in Table 5.11 (which represents 50% of the site) may need to be reduced, although given that</p>
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				<p>the development area in the current planning application is larger, it would be premature to reduce it to 1.9 ha (representing 25% of the site), which would be a “worse case” scenario from the Council’s perspective.</p> <p>Notwithstanding this, 1.9ha provision at Yalberton Road (Jackson Land) would leave 18.5 ha of employment land identified in the Paignton North and West Area. On the rule of thumb basis of 1 ha yielding 4,000 sq m employment floorspace, this figure remains more than sufficient to meet the 65,000 sq m of employment space identified in the Employment Lands Review (PBA 2013, paragraph 3.4.1).</p>
RAM75	Table 5.12	No representations		
RAM76	SDB1	Representations on SDB1 are dealt with under RMM12.		
RAM77	5.3.1	No representations		
RAM78	5.3.2	No representations		
RAM79	5.3.4	No representations		
RAM80	Table 5.14	No representations		
RAM81	SDB3	No representations		
RAM82	5.3.2.1	No representations		
RAM83	5.3.2.2	No representations		
RAM84	Table 5.17	No representations		
RAM85	Table 5.18	No representations		
RAM86	6.1.1.1	No representations		
RAM87	6.1.1.2	No representations		
RAM88	6.1.1.3	No representations		
RAM89	TC2	No representations		
RAM90	6.1.1.4	No representations		
RAM91	6.1.1.11	No representations		
RAM92	6.1.1.20	No representations		
RAM93	TO1	No representations		

RAM94	6.1.2.3	No representations		
RAM95	6.1.2.5	No representations		
RAM96	6.1.2.6	No representations		
RAM97	TO3	No representations		
RAM98	6.1.2.26	No representations		
RAM99	6.1.2.27	Marine Management Organisation General Observation	Observation that Marine Licences may be needed for new harbour extensions at Torquay and Northern Arm Breakwater. (See also RMM112)	RAM 99 already notes the need to consult with the MMO. Recommended Further Additional Modification: Add to the end of paragraph 6.1.2.27: "Works to harbours or off-shore facilities may require a Marine Licence from the MMO".
RAM100	6.1.2.28	No representations		
RAM101	6.1.2.29	No representations		
RAM102	TA2	No representations		
RAM103	TA3	No representations		
RAM104	C1	Brixham Neighbourhood Forum (828890) Object	Land at Churston Golf Clubhouse and 1 st and 18 th holes should be designated as Countryside.	The site of the clubhouse and 1 st and 18 th holes has not been included as a housing site in the Local Plan because there appear to be deliverability problems (in view of the dismissal of a new clubhouse on the nearby 3 rd fairway land (see RAM109 below). However, the triangular site is bordered on two sides by development. The Adopted Torbay Local Plan 1995-2011 does not identify the land as Countryside. It is not considered to be rural in character and it would not be appropriate to designate the site within the Countryside (Policy C1).
RAM105	6.3.1.2	No representations		
RAM106	6.3.1.4	No representations		
RAM107	6.3.1.6	No representations		
RAM108	6.3.1.8	No representations		

RAM109	C2	CPRE Devon (843591) Brixham Neighbourhood Forum (828890)	Object that land at Churston Golf Course is not included within Undeveloped Coast (Policy C2)	The Council has included land to the NE of Long Wools within the Undeveloped Coast (Policy C2). However the golf club land (3 rd tee fairway) has been assessed by the Council's Landscape/Urban Design Officer, and is not considered to be part of the coastal landscape. The appeal decision P/2013/0019 App/X1165/A/13/2205208 relating to the site notes it as contributing to the semi-rural character of the area, but does not assess it as being a coastal landscape. It also notes that the site is being bounded by residential development on two sides (paras 24-26).
RAM110	6.3.1.15	No representations		
RAM111	C3.3	No representations		
RAM112	6.3.1.21	Marine Management Organisation (494352)	General observation that Marine Licences may be needed for new harbour extensions at Torquay and Northern Arm Breakwater.(See also RMM99).	RAM 112 (and RAM99) already note the need to consult with the MMO. Recommended Further Additional Modification: Add to the end of paragraph 6.3:1.21: " Some marine works will require a marine licence and/or an Environmental Impact assessment as covered in Policy TO3.
RAM113	C4	No representations		
RAM114	6.3.1.22	No representations		
RAM115	6.3.1.24	No representations		
RAM116	6.3.1.25	No representations		
RAM117	6.3.1.32	No representations		
RAM118	C5	No representations		
RAM119	Policy NC1	Natural England (400188) Support	Support welcomed	
RAM120	6.3.2.1	No representations		

RAM121	6.3.2.2	No representations		
RAM122	6.3.2.3	No representations		
RAM123	6.3.2.4	No representations		
RAM124	6.3.2.5	No representations		
RAM125	6.3.2.7	No representations		
RAM126	6.3.2.10	No representations		
RAM127	6.3.3.17	No representations		
RAM128	6.4.1.1	No representations		
RAM129	H2	<p>Paignton Neighbourhood Forum (704914) South West Housing Association Registered Providers (HARP). Tetlow King for. (C:847469, A:844870). Object Roger Bristow (428525) Object Home Builders Federation (844154): General comment. Object</p>	<p>Object to change in affordable housing threshold. Should revert to the Submission Local Plan threshold (of 3 dwellings for greenfield sites). PNF have indicated that this should be a Main Modification.</p> <p>South West HARP: Need to consider impact of changing affordable housing threshold (in response to the PPG) in terms of viability and impact on meeting objectively assessed need (for affordable housing).</p> <p>Late representation from SW HARP informing the Council of the implication of West Berkshire DC and Reading BC versus DCLG ([2015] EWHC 2222 (Admin) and subsequent removal of national minimum thresholds from the NPPG.</p>	<p>Note that the change to affordable housing thresholds was put forward as a Replacement Modification in response to the Ministerial Statement and change to National Planning Practice Guidance (23b-012) introduced by the Government in February 2014.</p> <p>The Council's viability assessment was based on the Submission Local Plan threshold, and no objections were received to the Proposed Submission Local Plan's affordable housing threshold. The matter is also discussed in the Schedule of RMMs.</p> <p>Recommended Further Additional Modification: Delete RAM129 (i.e. revert to the Submission Local Plan threshold for affordable housing).</p> <p>The Council notes that DCLG may appeal the High Court Decision. However, if such an appeal is successful, it will establish the right of the Secretary of State to impose minimum thresholds outside of the development plan process.</p>

				The Council recognises that this change will have a knock-on effect on the Community Infrastructure Levy Draft Charging Schedule.
RAM130	6.4.1.7	Paignton Neighbourhood Forum (704914) Object	Object to change in affordable housing threshold- should be reduced in line with the Submission Local Plan	See RMM130 above. Recommended Further Additional Modification: Delete RAM130
RAM131	6.4.1.9	No representations		
RAM132	6.4.1.15	No representations		
RAM133	H3	No representations		
RAM134	6.4.1.19	Home Builders Federation (844134) Object/General Observations.	<p>Support the principle of self build housing but concerned that a 12 month cascade mechanism could delay housing delivery.</p> <p>The Plan also needs to address practicalities such as health and safety, working hours, build lengths etc.</p> <p>Self Build Housing needs to be defined (it is noted that RAM179 A adds a definition). Some matters will be clarified when the Self Build and Custom House Building Act 2015 has “bedded in”.</p>	<p>It appears that HBF have not objected to the principal or upper case policy wording of Policy H3. Since Policy H3 has not (substantively) changed since the Proposed Submission Plan, such comments would not have been duly made at this stage.</p> <p>Whilst HBF have commented on the 12 month cascade period in RAM135/paragraph 6.4.1.24, this period is also quoted in upper case policy (to which no duly made). The text in RAM135 adds flexibility to the interpretation of the policy and therefore deleting it would work against the spirit of HBF’s comments.</p> <p>The Council considers that the text in RAM135 (inserted into paragraph 6.4.1.24) linking self build housing to local needs is justified by the “exceptions” nature of the housing.</p> <p>HBF have raised detailed issues about the implementation of self build</p>

				<p>housing . These are helpful issues to raise but are more appropriately covered in supplementary guidance. Paragraph 6.4.1.24 notes that such matters will be set out in further detail in Supplementary Planning Guidance and/ Neighbourhood Plans.</p> <p>In order to address HBF's observations it is recommended that a number of minor additional Modifications are made to the supporting text to Policy H3:</p> <p>Recommended Further Additional Modification: Add to the end of the first sentence of paragraph 6.4.11.19: ...for their own occupation. <u>Where provided as affordable housing, they should also fulfill the definition of affordable housing in Appendix A and Annex 2 of the NPPF, i.e. be provided for people who cannot afford to buy or rent a house on the open market.</u></p> <p>Amend final sentence of Paragraph 6.4.24: The operation of this will also be addressed in <u>further guidance, as will other implementation matters such as health and safety, length of build program, working hours etc.</u></p>
RAM135	6.4.1.24	No representations		
RAM136	H4	No representations		
RAM137	6.4.1.31	No representations		
RAM138	6.4.1.43	South West Housing Association Registered Providers (HARP). Tetlow King for. (C:847469, A:844870). Object	Objection: Need to demonstrate the need for requirement for accessible and adaptable dwellings –(PPG 56-00-20150327).	RAM138 is a minor amendment to reflect the demise of the Lifetimes Homes Standard, and not a substantive change to the Local Plan.

		Homebuilders Federation (844154) Object		Torbay has an ageing population and therefore is likely to require a proportion of accessible and adaptable dwellings.
RAM139	DE1	Police Architectural Liaison Officer (ALO) (425628) Support Sport England (501495) Support	Support references to minimizing the opportunities for crime, antisocial behaviour and conflict in the built environment.	Minor amendments to Policy DE1 and paragraph 6.4.2.4 have previously been agreed with the Police Architectural Liaison Officer.
RAM140	6.4.2.4	Police Architectural Liaison Officer (ALO) (425628) Support	Support references to minimizing the opportunities for crime, antisocial behaviour and conflict in the built environment.	Support welcomed. Minor amendments to Policy DE1 and paragraph 6.4.2.4 have previously been agreed with the Police Architectural Liaison Officer ((Consultee 425628).
RAM141	6.4.2.5	No representations		
RAM142	Policy DE3	No representations		
RAM143	6.4.2.10	South West Housing Association Registered Providers (HARP). Tetlow King for. (C:847469, A:844870). Object Homebuilders Federation (844154) Object	Object to including space standards as Explanatory Text and without testing the impact on viability. Object to impact of minimum space standards on viability and deliverability of small dwellings.	The space standard is set out for guidance. It is likely to be applied flexibly to most types of development other than small conversions (where small space standards could exacerbate deprivation). Clarify purpose of space standards by adding to the end of 6.4.2.14 (RAM143). Recommended Further Additional Modification: "These (space standards) are intended to be operated flexibly with regard to viability and other considerations. However the creation of small apartments by subdivision/ conversion will be resisted where this would result in an unpleasant or unhealthy living environment, or exacerbate concentrations of deprivation (see also Policy SS10). This text cross references text

				already within the Local Plan. It is proposed to test the viability of minimum space standards as part of additional testing of CIL.
RAM144	Table 6.1	Homebuilders Federation (844154) (Object)	As per RAM143	As per RAM143
RAM144 A	6.4.2.17	South West Housing Association Registered Providers (HARP). Tetlow King for. (C:847469, A:844870). Object Homebuilders Federation (844154) General observation	Lifetime Homes standard has been superseded and should be removed from the Local Plan.	This does not relate to a RAM, but to the replacement of the Lifetime Homes standard noted at RAM138 above. Reference to accessible and adaptable homes still serves a useful purpose in the Local Plan Recommended Further Additional Modification: Replace "lifetime" with "accessible and adaptable" at Paragraph 6.4.2.17
RAM145	6.4.2.19	No representations		
RAM146	DE5	No representations		
RAM147	6.4.2.30	No representations		
RAM148	6.4.3.5	No representations		
RAM149	6.4.3.7	No representations		
RAM150	SC2	No representations		
RAM151	6.4.3.10	No representations		
RAM152	6.4.3.17	South Devon College 440790 (GVA Planning On behalf of: 847471)	Support	Support welcomed
RAM153	6.4.3.21	No representations		
RAM154	6.4.3.25	No representations		
RAM155	6.5.1.6.	Homebuilders Federation (844154) General observation	General observation that the Council should check RAM155 (para 6.5.1.6) to ensure compliance with Government standards	Additional text inserted into paragraph 6.5.1.6 as RAM155 needs to be amended to reflect the Government's position on allowable solutions. Recommended Further Additional Delete last paragraph of additional text to 6.5.1.6: The Government is

				also committed to introducing a range of “allowable Solutions to allow off site carbon abatement, where necessary , as part of implementing the Zero Carbon standard during 2016.
RAM156	ER1	Natural England (400188) Support South West Water (417366) Support	Support	Support welcomed
RAM157	6.5.2.3	No representations		
RAM158	6.5.2.6,	No representations		
RAM159	6.5.2.12	No representations		
RAM160	6.5.2.13	No representations		
RAM161	6.5.2.14	No representations		
RAM162	6.5.2.17	No representations		
RAM163	ER2	Natural England (400188) Support South West Water (417366) Support	Support	Support welcomed
RAM164	6.5.2.18	No representations		
RAM165	6.5.2.20	No representations		
RAM166	6.5.2.21	No representations		
RAM167	W5	Natural England (400188) Support South West Water (417366) Support	Support	Support welcomed
RAM168	6.5.3.25	No representations		
RAM169	6.5.3.26	Paignton Neighbourhood Forum (704914) Object Roger Bristow (428525) Object	Object: Strengthen the wording of 6.5.3.26 to note that water efficiency measures are required and developments will be required to provide details of separate foul and drainage measures when an application is submitted.	Noted. Policies ER1, ER2 and W5 have been revised to require separate foul and surface water drainage. The Council would not object to amending the additional text as follows. Whilst not essential to the Plan’s soundness it is consistent with changes to the Plan elsewhere (e.g. paragraphs 6.5.2.3, (RAM157) and 6.5.2.13 (RAM160)). Recommended Further Additional Modification: Amend second added paragraph of 6.5.3.26: Consequently new development should will be

				required to have separate foul and storm water drainage systems. Details of these should be provided at planning application stage.
RAM170	6.5.3.27	No representations		
RAM171	6.5.3.28	No representations		
RAM172	6.5.4.9	No representations		
RAM173	7.4.11	No representations		
RAM174	7.4.12	No representations		
RAM175	7.4.16	No representations		
RAM176	7.4.23	No representations		
RAM177	7.5.14	Paignton Neighbourhood Forum (704914) General observation	General observation in relation to Policy SS1/RMM1. Refer to baseline of around 59,000 jobs in Torbay at 2012, based on NOMIS Business Register.	Agree that it is appropriate to mention a baseline for jobs (see Schedule of RMMs). Recommended Further Additional Modification: Economic Performance (including job creation from Business Register and other surveys, against a baseline of 59,000 jobs in Torbay in 2012 (NOMIS Business Register) , unemployment.....
RAM178	Table 7.1	Paignton Neighbourhood Forum (704914) Object Roger Bristow (428525) Object	Objections to housing trajectory in the context of RMM1/SS1. A reduced housing trajectory based on providing 7,900 dwellings is set out.	This objection is directly related to RMM1/SS1. See schedules of representations to RMMs
RAM179	Appendix A	Roger Bristow (428525) Object	Objection in the context of objection to Collaton St Mary	
RAM180	Appendix C	No representations		
RAM181	Appendix E	Paignton Neighbourhood Forum (704914) Object Roger Bristow (428525) Object	Yalberton Valley should be included as a Regionally Important Geological Site (RIGS) Delete the change of map notation at Clennon Valley, Paignton (RAM181)	Yalberton: RIGS are designated by the Devon RIGS Group and shown on the Local Plan for information. Yalberton's geodiversity significance would need to be promoted to that Group. The Policies Map change at Clennon

				Valley (RAM181) is in response to Devon Biodiversity Records Centre review of the site's biodiversity interest.
RAM182	Appendix G car parking requirements	No representations		
	Policies Map Booklet	Paignton Neighbourhood Forum (704914) Object Stoney Park Allotments Association (923362) Object	Delete the change of map notation at Clennon Valley, Paignton (RAM181) Delete Future Growth Area at Collaton St Mary (Objection in context of RMM3/SS2 and RMM11/SDP3 Redraw boundary of former Northcliff Hotel site in Brixham to exclude the land used as allotments.	Yalberton: See RAM181 Collaton St Mary: See schedule of Replacement Main Modifications (RMM3 and RMM11). Site of former Northcliff Hotel, Brixham. Recommended Additional Modification to amend Policies Map (Brixham Town Centre Inset) to exclude area used as allotments from the Northcliff Hotel site.