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Date: Monday, 06 July 2026

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Dear Member

## **OVERVIEW AND SCRUTINY BOARD - WEDNESDAY, 8 JULY 2026**

I am now able to enclose, for consideration at the Wednesday, 8 July 2026 meeting of the Overview and Scrutiny Board, the following reports that were unavailable when the agenda was printed.

<b>Agenda No</b>	<b>Item</b>	<b>Page</b>
5.	<b>Torbay Local Plan Regulation 19 Publication</b> Torquay Neighbourhood Forum Written Statement to Overview and Scrutiny Board	(Pages 3 - 6)

Yours sincerely

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Clerk

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## Overview & Scrutiny Board Meeting 08 July 2026 Torbay Local Plan Reg 19 Consultation

This written statement has been reviewed and agreed by the Steering Group of the Torquay Neighbourhood Plan Forum.

The Steering Group cannot support a recommendation to Cabinet to approve this document for publication at the Reg 19 Stage.

The Forum is frustrated that it has been excluded, apart from one meeting, from the Local Plan Working Party throughout the process for developing an updated Torbay Local Plan. We and the other Neighbourhood Plan Fora are responsible for developing the Neighbourhood Plans which should be in harmony with the Local Plan. The Torquay Neighbourhood Plan Forum connects closely with the general Planning operation, and always inputs to the Planning Committee on Planning Applications for Torquay. Our philosophy is to ensure the right development in the right place. We are not 'NIMBY's, and support many Applications. The Neighbourhood Fora should have all been represented on the Local Plan Working Party.

We have major concern about a member of the Local Plan Working Party also being a member of the Broadsands Churston & Galmpton Neighbourhood Forum, and the elimination of Monksbridge (H3BCG.3) from the Reg 19 document. This has the appearance of a significant conflict of interest.

We acknowledge the challenge placed upon Torbay by the Housing Minister, who is clearly out of touch with the realities of the land supply in Torbay. Also, Torquay has been assigned the greatest number of new dwellings for Torbay. At the early stages of the HELAA process, the Forum submitted a workbook offering over 2800 potential housing sites. Not all were taken up by Future Planning.

The Forum submitted a detailed response to the Reg 18 Consultation, and we are aware of a significant number of responses from residents of Torquay. We are not aware of the responses to the Reg 18 Consultation being made public, nor are we aware of how the Local Plan Working Party addressed these responses other than through review of the proposed draft of the Reg 19 proposal in the Agenda pack.

There are a number of key infrastructure considerations that have not been addressed, particularly to the Greenfield sites in the northern rural areas of Torquay. These are:

- Sustainable transport
  - Provision for safe walking and cycling (see Strategic Priority 3)
  - Sufficient public transport
- Drainage
  - Flood risk from surface water drainage
  - Foul drainage – currently no mains drainage
  - Overall Capacity for sewage treatment in Torbay is limited
- Net zero
  - Need for cars
  - Energy for pumping sewage up to 90m to reach the only sewer network.
- Biodiversity



- Protected species: Greater and Lesser Horseshoe Bats, Cirl Buntings and Badgers
- Achieve 10% Net biodiversity gain
- Elimination of grazing land

These considerations apply particularly to sites proposed in Maidencombe, especially when compared with Monksbridge.

	Monksbridge	Maidencombe
Drainage	Flood Risk Zone 2 Connection to mains drainage feasible	Flood Risk Zone 3. No mains drainage
Public transport	#12 Bus daytime every 12 minutes plus Night Bus	#11 Bus hourly, daytime only
Walking and cycling	Safe routes to Brixham. A3022 has a pavement.	Teignmouth Road not safe for walking & cycling. No pavement. Blind bend between Brunel Manor & Moor lane.
Biodiversity	Horseshoe Bats, Cirl Bunting	Horseshoe Bats, Cirl Bunting Can not achieve biodiversity gain

The Steering Group cannot understand the rationale for eliminating Monksbridge but keeping the sites in Maidencombe, particularly Sladnor Park.

Site H3T.1 was assigned for 150 dwellings at Reg 18. The Forum prefers that the site is removed entirely. But with the high demand for houses, we suggested a maximum of 20 being deliverable on the basis of most landowners being unwilling to sell, the infrastructure capacity, and the flood risk to Stokeinteignhead. This would allow for a few infills. Although the reduction from 150 is welcome, we continue to consider that 30 is too high.

The Steering Group understands that Sladnor Park has been retained at 120 dwellings on the basis of a Consented scheme for a Retirement Village plus a current alternative Planning Application for 110 houses. The increased impermeable surface area from these large scale developments in Sladnor Park poses a significant flood risk to the lower part of Maidencombe, which is a Flood Risk Zone 3. The Torbay Council Drainage Engineers have raised major objections to the current Planning Application. The Application has been paused while the Applicant attempts to address these issues, but the Steering Group believes that they are insoluble for developments of this scale. As the previously Consented scheme has Drainage as a Condition and must meet current standards, we believe that drainage for this scheme also is unresolvable.

There is currently no mains drainage in Sladnor Park or most of Maidencombe. Foul waste from a large development in Sladnor Park would have to be pumped up an elevation of 90m to the main sewer outside Brunel Manor on the Teignmouth Road. It is uncertain whether that sewer has the capacity for >100 dwellings. Furthermore, there would be a significant energy consumption for the pump to be working 24/7. There is a major concern about release of raw sewage into Maidencombe and coastal waters should the pump fail. No Exceedance Route has been proposed.



This level of development in Sladnor Park does not meet the NPPF criteria for Sustainable Development due to:

- Flood risk
- Non-sustainable transport
- No viable safe Active Travel Routes, or compliant site access, infrastructure
- High energy consumption (Not Net Zero)
- Impact on protected species.
- Significant tree felling (Arborologist has raised concerns).
- The Applicant for P/2025/0353 has already asked for exemption from biodiversity net gain

The Steering Group would support a modest development on the footprints of existing/previous construction corresponding to 16 dwellings and two 10-unit apartment blocks giving a total of 36 units.

Overall, if the Reg 19 Housing Site proposals were amended as follows, the Forum would support Cabinet approval:

- Maidencombe H3T.1 – 20 units
- Sladnor Park H3T.2 – 36 units
- Monksbridge H3BCG.3 – 30 units

The Steering Group hopes that the Overview & Scrutiny Board agrees with our concerns, and requires the above changes to be made before submission to Cabinet.

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Chair

Torquay Neighbourhood Plan Forum

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