

Monday, 13 July 2026

CABINET

A meeting of **Cabinet** will be held on

Tuesday, 21 July 2026

commencing at **5.30 pm**

The meeting will be held in the Banking Hall, Castle Circus entrance on the left corner of the Town Hall, Castle Circus, Torquay, TQ1 3DR

Members of the Committee

Councillor David Thomas (Chair)

Councillor Billings

Councillor Jacqueline Thomas

Councillor Bye

Councillor Tranter

Councillor Chris Lewis

Councillor Tyerman

A Healthy, Happy and Prosperous Torbay

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Governance Support, Town Hall, Castle Circus, Torquay, TQ1 3DR

Email: governance.support@torbay.gov.uk - www.torbay.gov.uk

CABINET AGENDA

1. Apologies

To receive apologies for absence.

2. Minutes

To confirm as a correct record the Minutes of the meeting of the Cabinet held on 9 June 2026.

(Pages 5 - 24)

3. Disclosure of Interests

- (a) To receive declarations of non pecuniary interests in respect of items on this agenda.

For reference: Having declared their non pecuniary interest members may remain in the meeting and speak and, vote on the matter in question. A completed disclosure of interests form should be returned to the Clerk before the conclusion of the meeting.

- (b) To receive declarations of disclosable pecuniary interests in respect of items on this agenda.

For reference: Where a Member has a disclosable pecuniary interest he/she must leave the meeting during consideration of the item. However, the Member may remain in the meeting to make representations, answer questions or give evidence if the public have a right to do so, but having done so the Member must then immediately leave the meeting, may not vote and must not improperly seek to influence the outcome of the matter. A completed disclosure of interests form should be returned to the Clerk before the conclusion of the meeting.

(Please Note: If Members and Officers wish to seek advice on any potential interests they may have, they should contact Governance Support or Legal Services prior to the meeting.)

4. Urgent Items

To consider any other items the Chair decides are urgent.

5. Matters for Consideration

6. Acquisition and redevelopment of Projects 4 and 5 of the Accommodation Repurposing Programme

To consider a report that seeks approval for the acquisition and linked redevelopment for Projects 4 and 5 of the Accommodation Repurposing Programme.

7. Redevelopment of former Crossways Shopping Centre, Paignton for the Delivery of Extra Care Housing

To consider a report that seeks approval of the Business Case for the Redevelopment of former Crossways Shopping Centre, Paignton for the Delivery of Extra Care Housing.

(Pages 25 - 82)

8. **Torbay Local Plan Regulation 19 Publication** (Pages 83 - 432)
To consider a report that seeks approval to publish the Regulation 19 “publication version” of the Torbay Local Plan 2025-45 for consultation.
9. **Torbay Destination Management Plan Review** (Pages 433 - 524)
To consider a report that seeks approval to launch the Torbay Destination Management Plan for public consultation.
10. **Hackney Carriage Tariff Increase** (Pages 525 - 556)
To consider a review of the Taxi Table of Fares (Taxi Tariff), following a request to increase the Hackney Carriage fare tariff in Torbay.
11. **Terra Firma - English Riviera Geopark Review - Report of the Overview and Scrutiny Board** (Pages 557 - 560)
To respond to the recommendations of the Overview and Scrutiny Board.

Live Streaming and Hybrid Arrangements

To encourage more people to engage in our public meetings the Council is live streaming our Cabinet meetings on our YouTube channel in addition to recording the meetings and publishing the recording on our website. To watch the meeting live please visit <https://www.youtube.com/user/torbaycouncil>.

We are also using hybrid meeting arrangements to enable officers and Councillors who are not members of the Cabinet to either attend the meeting in person or to attend the meeting remotely via Zoom. Anyone attending the meeting remotely must use their raise hand function when they wish to speak and to declare any interests at the appropriate time. If anyone attending the meeting remotely loses connection the meeting will continue and they will have the option to follow the meeting via the YouTube live stream.

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Minutes of the Cabinet

9 June 2026

-: Present :-

Councillor David Thomas (Chair)

Councillors Billings, Bye, Chris Lewis, Jacqueline Thomas, Tranter and Tyerman

(Also in attendance: Councillors Cowell, Johns (virtually), Law, Barbara Lewis (virtually)
and Twelves (virtually))

1. Minutes

The Minutes of the meeting of the Cabinet held on 12 May 2026 were confirmed as a correct record and signed by the Chair.

2. Disclosure of Interests

No declarations of interest were made.

3. Matters for Consideration

The Cabinet considered the following matters, full details of which (including the Cabinet's decisions and recommendations to Council) are set out in the Record of Decisions appended to these Minutes.

4. Disposal of Occombe Farm and Land laying North of Preston Down Road, Paignton

5. Disposal of Land at Claylands (Phase 2), Paignton

6. Budget Monitoring - Revenue and Capital Outturn 2025/26 Quarter 4

7. Local Special Educational Needs and Disabilities (SEND) Reform Plan

8. Torbay Youth Justice Plan 2026-27

9. Tobacco and Vapes Framework 2026 - 2031

10. Specialist Stop Smoking Service Procurement

11. Social Mobility in Torbay - Report of the Overview and Scrutiny Board

Chair

Record of Decisions

Disposal of Occombe Farm and Land laying North of Preston Down Road, Paignton

Decision Taker

Cabinet on 09 June 2026.

Decision

1. That, in accordance with Standing Order D11, in order for the site to be brought back into active use at the earliest opportunity, it is necessary for the decision to be implemented immediately. Greendale have indicated its intention to reopen and operate key elements of the site in time for the forthcoming summer season. Any delay arising from the call-in process would significantly prejudice this timescale and risk the loss of economic, tourism and community benefits associated with the summer period. In addition the site has been closed since December 2025 and is currently incurring ongoing holding, security and maintenance costs for the Council. Delaying implementation of the decision would prolong these financial liabilities and defer the receipt of a capital sum above market value, as well as postponing wider regeneration benefits.

Accordingly the Cabinet's decision is deemed to be urgent. Therefore, Cabinet determines that Call-in shall be waived as any delay likely to be caused by the call-in process would prejudice the public and the Council's interest. The Overview and Scrutiny Co-ordinator was consulted on 28 May 2026; and

2. that the Director of Finance in consultation with Cabinet Member for Place Development and Economic Growth be authorised to dispose of the Council's freehold interest of Occombe Farm and land lying north of Preston Down Road Paignton, (as set out in Appendix 1 to the submitted report), to Greendale SPV 1 Limited for a sum in excess of Market Value (as set out in exempt Appendix 2 to the submitted report) and agree and finalise the detailed transfer process and terms based on Estates and Legal advice, which will include overage provisions.

Reason for the Decision

The disposal of this asset to Greendale SPV 1 Limited will generate a significant capital receipt, above Market Value, enabling the Council to support priority medium-term projects.

The proposal will also support the growth of a Devon-based business, contributing to local employment and economic activity.

Disposal will reduce the Council's ongoing holding, maintenance, and liability costs associated with the site, including relieving SWISCo of the burden of maintaining farmland and a wooded area subject to Special Site of Scientific Interest (SSSI) designation.

Furthermore, it will bring forward development of a site that has remained closed since December 2025 following the demise of Torbay Coast and Countryside Trust (The Trust), ensuring the asset is returned to productive use.

Implementation

The decision in respect of the disposal of Occombe Farm and Land laying North of Preston Down Road, Paignton will come into force immediately as the decision maker has decided that any delay likely to be caused by the call-in process would prejudice the public and the Council's interest. The Overview and Scrutiny Co-ordinator was consulted on 28 May 2026.

Information

Torbay Council's Strategic Asset Management Plan sets out the Council's approach to the strategic management of its assets, how it would support service delivery, provide the Council with income and how it would fulfil its mission to support, enable and empower its residents, our communities and our partnerships, to promote growth and place shaping within Torbay.

The site was previously operated by The Trust under a long-term lease held from the Council. However, The Trust went into administration in December 2025, and the site was handed back to the Council. To keep the site secure, the Council had to deploy an on-site permanent external security firm throughout 2026, to protect the site whilst a long-term decision was made on the future use. The on-going holding costs of the vacant asset was and continued to be significant.

To facilitate the decision on future use and options for the site the Council's Asset Team obtained an independent valuation undertaken by Stags Professional Services, producing a Market Value. This valuation formed the basis for negotiation with Greendale, following their interest becoming known. Negotiations crystallised and resulted in the submission of an unconditional offer above Market Value.

At the meeting Councillor Chris Lewis proposed and Councillor David Thomas seconded a motion that was agreed unanimously, as set out above.

Alternative Options considered and rejected at the time of the decision

SWISCo approached the Council with an interest in acquiring part of the site for use as a depot to support its fleet and operational activities within this area of Torbay. However, this proposal did not extend to the entirety of the site, leaving the Council with the need to dispose of the remaining land separately on a leasehold basis. Fragmenting the site in this way was likely to reduce its overall capital value and market attractiveness.

Retaining the asset in its vacant condition resulted in ongoing and potentially increasing holding costs and liabilities for the Council, without generating any income or wider benefit.

Marketing the site on the open market and inviting alternative offers, including speculative or conditional bids, was considered. However, this approach introduced a greater degree of risk, delay, and uncertainty in securing a disposal, with no guarantee of achieving a comparable outcome.

Retaining the freehold and marketing the site on a leasehold basis was also considered. While this option could have generated a revenue stream, it was considered unlikely that a single operator would take a lease of the site in its entirety. Any prospective tenant would also have been likely to require significant lease incentives from the Council. More likely, the site could have become multi-let, resulting in a management-intensive arrangement. Under this option,

the Council would have retained responsibility for ongoing holding costs, site management, boundary security, and the risks associated with vacant units, creating an additional and continuing financial burden.

Is this a Key Decision?

No

Does the call-in procedure apply?

No

Declarations of interest (including details of any relevant dispensations issued by the Standards Committee)

None

Published

12 June 2026

Signed: _____ Date: _____
Leader of Torbay Council on behalf of the Cabinet

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Record of Decisions

Disposal of Land at Claylands (Phase 2), Paignton

Decision Taker

Cabinet on 09 June 2026.

Decision

1. that the Director of Finance in consultation with Cabinet Member for Place Development and Economic Growth be authorised to dispose of the Council's freehold interest in land at Claylands (Phase 2), Brixham Road, Paignton, as shown edged red in Appendix 1 to BTA for Market Value (as set out in exempt Appendix 2) to the submitted report; and
2. that the Director of Finance be authorised to agree and finalise the detailed transfer process and terms based on Estates and Legal advice, in consultation with the Cabinet Member for Place Development and Economic Growth.

Reason for the Decision

The disposal of the employment land to BTA would generate a capital receipt for the Council and provide a number of additional benefits. It supported the growth of a significant local business operating within Torbay's marine and fisheries sector and would enable BTA to develop new operational facilities. In addition, it would reduce the Council's ongoing holding and maintenance liabilities associated with the site and bring forward development on land that had remained undeveloped due to viability and infrastructure constraints.

The disposal would also unlock the Port Infrastructure Project, including the redevelopment of Oxen Cove, through the relocation of BTA from the site.

The land was a former inert waste quarry with a limited developable area, estimated at 1.8 hectares (4.45 acres). The independent valuation reflected the site's constraints, including its topography, the requirement for woodland retention, access limitations, and the need for significant enabling works.

Implementation

The decision will come into force and may be implemented on 22 June 2026 unless the call-in procedure is triggered (as set out in the Standing Orders in relation to Overview and Scrutiny).

Information

Torbay Council's Strategic Asset Management Plan sets out the Council's approach to the strategic management of its assets, how it will support service delivery, provide the Council with income and how it will fulfil its mission to support, enable and empower its residents, our communities and our partnerships, to promote growth and place shaping within Torbay.

The site had been marketed previously for employment led development. However, no viable proposals had been progressed due to site constraints and development costs.

The independent valuation undertaken by Vickery Holman produced a Market Value that reflected the limited net developable area, ground conditions, ecological constraints, and

infrastructure requirements. The land formed part of a wider employment allocation and had remained undeveloped for several years following development of the site adjacent. Disposal to BTA would support local economic activity and reduce the Council's ongoing holding costs and liabilities. Furthermore, disposal to BTA would facilitate their extraction from Oxen Cove, helping to unlock redevelopment of the area under the Port Infrastructure Project.

At the meeting Councillor Chris Lewis proposed and Councillor David Thomas seconded a motion that was agreed unanimously by the Cabinet, as set out above.

Alternative Options considered and rejected at the time of the decision

Retaining the asset would result in the Council continuing to incur holding costs and liabilities.

Leasehold disposal had been considered but rejected due to the constraints associated with the site.

Marketing the site and inviting other offers such as speculative or conditional offers would introduce risk, delay, and uncertainty. It would not facilitate the vacant possession strategy relating to Oxen Cove and may impact delivery of the Port Infrastructure Project.

BTA's unconditional offer provided certainty and aligned with the intended employment use and therefore, was the preferred option.

Is this a Key Decision?

No

Does the call-in procedure apply?

Yes

Declarations of interest (including details of any relevant dispensations issued by the Standards Committee)

None

Published

12 June 2026

Signed: _____
Leader of Torbay Council on behalf of the Cabinet

Date: _____

Record of Decisions

Budget Monitoring - Revenue and Capital Outturn 2025/26 Quarter 4

Decision Taker

Cabinet on 09 June 2026.

Decision

That Cabinet recommends to Council:

- 1) that the revenue outturn position be noted;
- 2) that the transfer of the £0.174m year-end surplus into a specific reserve to be allocated across priority initiatives, to be determined by the Cabinet, with consideration given to areas identified through the 2026/27 budget setting consultation responses and December 2025 resident's survey results, be approved; and
- 3) that the revisions to the Capital Investment Plan, as set out in Appendix 1 to the submitted report be approved.

Reason for the Decision

To ensure the Council operates in a prudent manner and works to maintain a balanced budget.

Implementation

The recommendation of the Cabinet will be considered at the Council meeting on 23 July 2026.

Information

The Budget Monitoring Revenue and Capital Outturn 2025/26 report set out a high-level budget summary of the Council's revenue and capital position for the financial year 2025/26. The year end outturn figures were based on spend and financial information at the end of the financial year, with variances against the approved budget.

The Council had delivered a year end underspend of £0.174m against its revenue budget, an improvement of £0.873m on the position projected at quarter 3. The Overview and Scrutiny Board considered the report on 3 June 2026 and made recommendations to the Cabinet. The Cabinet's response to these recommendations was circulated prior to the Cabinet meeting.

At the meeting, Councillor Tyerman proposed and Councillor Billings seconded a motion that was agreed unanimously by the Cabinet, as set out above.

Alternative Options considered and rejected at the time of the decision

There were no alternative options considered.

Is this a Key Decision?

No

Does the call-in procedure apply?

No

Declarations of interest (including details of any relevant dispensations issued by the Standards Committee)

None

Published

12 June 2026

Signed: _____ Date: _____
Leader of Torbay Council on behalf of the Cabinet

Record of Decisions

Local Special Educational Needs and Disabilities (SEND) Reform Plan

Decision Taker

Cabinet on 09 June 2026.

Decision

1. that the SEND Reform Plan set out at Appendix 3 be approved and delegated authority be given to the Director of Children's Services to implement the Plan, including the high needs stability grant, once approval for the Plan is gained from the Department for Education;
2. that the requirements and expectations of the Local Area SEND Reform Plan guidance be noted;
3. that the development of a Local SEND Reform Plan in line with national guidance and system partnership expectations be endorsed;
4. that the submission of the Local SEND Reform Plan to the Department for Education (DfE) and NHS England by 19 June 2026 be approved; and
5. that the Director of Children's Services, in consultation with the Cabinet Member for Children's Services, be given delegated authority to finalise the Plan prior to submission to the DfE and the NHS.

Reason for the Decision

All Local Area Partnerships had been formally commissioned by Government to produce a Local SEND Reform Plan, setting out how they would deliver systemic improvement and respond to national SEND reform expectations.

Whilst delivering systemic improvements the Plan would also provide benefits for Torbay's residents such as earlier identification and support, reducing escalation of needs and crisis intervention, more inclusive mainstream provision, enabling more children to be supported locally, improved joined up working across education, health, and care services, greater clarity and consistency in support available to families; and strengthened accountability and oversight, ensuring ongoing improvement and transparency.

Implementation

The decision will come into force and may be implemented on 22 June 2026 unless the call-in procedure is triggered (as set out in the Standing Orders in relation to Overview and Scrutiny).

Information

On 9 March 2026, the Government wrote to local authorities formally commissioning the development and implementation of Local SEND Reform Plan. The expectation was for the Plan to clearly set out the actions that Torbay would take to drive system reform locally.

The Local SEND Reform Plan was a nationally mandated requirement forming part of a wider programme to reform the SEND system across England. The guidance sets out how local area

partnerships, led by the local authority as system convener, must work collaboratively with Integrated Care Boards, schools, trusts, and other stakeholders to design and deliver a comprehensive improvement plan.

The Plan has been co-written by the SEND Local Area Partnership, including schools and settings, and influenced by the input of children, young people with SEND and their families through engagement and co-design sessions. The Plan also incorporates Torbay's Priority Impact Plan, which was the improvement plan in response to the Torbay's 2025 SEND Local Area Inspection.

At the meeting Councillor Bye proposed and Councillor Tyerman seconded a motion that was agreed unanimously by the Cabinet, as set out above.

Alternative Options considered and rejected at the time of the decision

There were no alternative options were considered, as the development and submission of a Local SEND Reform Plan was a statutory requirement set by the Department for Education for all local authorities and their partners.

Is this a Key Decision?

No

Does the call-in procedure apply?

Yes

Declarations of interest (including details of any relevant dispensations issued by the Standards Committee)

None

Published

12 June 2026

Signed: _____ Date: _____
Leader of Torbay Council on behalf of the Cabinet

Record of Decisions

Torbay Youth Justice Plan 2026-27

Decision Taker

Cabinet on 09 June 2026.

Decision

That the Torbay Youth Justice Plan 2026-27 be approved and forwarded to the Youth Justice Board.

Reason for the Decision

The Council had a legal duty to produce and approve the Youth Justice Plan under Section 40 of the Crime and Disorder Act 1998. Furthermore, approval of the Plan was necessary to secure funding from the Youth Justice Board and other statutory partners.

Implementation

This decision will come into force and may be implemented on 22 June 2026 unless the call-in procedure is triggered (as set out in the Standing Orders in relation to Overview and Scrutiny).

Information

Torbay Council was required under the Crime and Disorder Act 1998 to approve and submit an annual Youth Justice Plan to the Youth Justice Board. The Plan had been developed in consultation with partner agencies, staff, service users, and reviewed by the Children and Young People's Overview and Scrutiny Sub-Board.

The Plan followed the national Youth Justice Board's guidance on the production and contents of the Youth Justice Plans and outlined how youth justice services were to be delivered and funded in Torbay, with a focus on:

- preventing children from offending;
- reducing reoffending; and
- preventing children from entering custody.

At the meeting Councillor Bye proposed and Councillor Billings seconded a motion that was agreed unanimously by the Cabinet, as set out above.

Alternative Options considered and rejected at the time of the decision

No other options were considered.

Is this a Key Decision?

No

Does the call-in procedure apply?

Yes

Declarations of interest (including details of any relevant dispensations issued by the Standards Committee)

None

Published

12 June 2026

Signed: _____ Date: _____
Leader of Torbay Council on behalf of the Cabinet

Record of Decisions

Tobacco and Vapes Framework 2026 - 2031

Decision Taker

Cabinet on 09 June 2026.

Decision

That the Tobacco and Vapes Framework 2026 – 2031 be approved.

Reason for the Decision

The framework would provide a clear, coordinated strategic direction across the Council and partner organisations to reduce smoking prevalence and associated harms. Adopting the framework would support improved public health outcomes by reducing exposure to second-hand smoke, addressing health inequalities, and contributing to improved life expectancy. The framework would also enable the commissioning and delivery of targeted support services for both adults and young people, align local action with national policy including the Smokefree 2030 ambition and forthcoming Tobacco and Vapes legislation, and help address issues such as illegal tobacco trade and environmental impacts from smoking and vaping waste.

Implementation

The decision will come into force and may be implemented on 22 June 2026 unless the call-in procedure is triggered (as set out in the Standing Orders in relation to Overview and Scrutiny).

Information

The Tobacco and Vapes Framework 2026–2031, sets out the strategic approach to reducing smoking and vaping-related harms in Torbay. The framework was developed in response to the UK Government's ambition to achieve a smokefree population (less than 5% smoking prevalence) by 2030 and aimed to coordinate local action to support this objective. The framework identified five priority areas: preventing youth uptake of vaping, supporting adults to quit smoking and long-term vaping, creating smoke-free and vape-free environments, strengthening tobacco control, and monitoring emerging harms.

At the meeting Councillor Tranter proposed and Councillor Jackie Thomas seconded a motion that was agreed unanimously, by the Cabinet, as set out above.

Alternative Options considered and rejected at the time of the decision

The alternative option was to not adopt the framework. This option was discounted as it would risk a lack of coordination across services and partners, potentially slowing progress towards achieving smokefree ambitions and reducing opportunities to address smoking and vaping harms effectively.

Is this a Key Decision?

No

Does the call-in procedure apply?

Yes

Declarations of interest (including details of any relevant dispensations issued by the Standards Committee)

None

Published

12 June 2026

Signed: _____ Date: _____
Leader of Torbay Council on behalf of the Cabinet

Record of Decisions

Specialist Stop Smoking Service Procurement

Decision Taker

Cabinet on 09 June 2026.

Decision

1. that the Director of Public Health in consultation with the Cabinet Member for Adult and Community Services, Public Health and Inequalities be given delegated authority to award the contract to the selected provider as a result of a compliant procurement process; and
2. that this decision will be on the basis that through the procurement procedure none of the specification, the budget nor the procurement processes proposed are materially different from what is outlined in the submitted report. If any of these do change materially, an updated report will be submitted for reconsideration before the Director of Public Health awards the contract.

Reason for the Decision

A new procurement would enable expansion and modernisation of the service, including the introduction of digital and self-management support, improved behavioural interventions, and targeted communications to increase engagement. The approach supported the Council's public health objectives, including reducing smoking prevalence, addressing health inequalities, and contributing to the Smokefree 2030 ambition. It also ensured compliance with ring-fenced public health grant conditions, including requirements to maintain investment in smoking services and achieve specified quit targets.

Implementation

The decision will come into force and may be implemented on 22 June 2026 unless the call-in procedure is triggered (as set out in the Standing Orders in relation to Overview and Scrutiny).

Information

Public Health receives core funding as part of the ring-fenced grant to deliver smoking services and tobacco control activities. From 2026-27 it will also receive as part of the core public health ring fenced grant, a separate allocation, also ring-fenced, from the Department for Health and Social Care to further increase support for smokers to quit.

The current specialist stop smoking service was commissioned as part of the integrated Healthy Behaviours Service (Your Health Torbay) delivered by ABL Health. The current contract ends on 31 March 2027 with no further contract extensions available. Therefore, an open market procurement is required to select a provider who can deliver the updated requirements and to ensure value for money.

At the meeting Councillor Tranter proposed and Councillor Jackie Thomas seconded a motion that was agreed unanimously by the Cabinet, as set out above.

Alternative Options considered and rejected at the time of the decision

Three options had been considered. The option to recommission the service using the existing specification and budget was discounted as it would not enable modernisation or meet the increased activity required through additional funding. The option to commission a combined children's and adult service was also rejected due to a lack of suitable providers and differing service needs between population groups. The preferred option, was to procure an adult-only specialist stop smoking service with an updated specification and budget to allow for expansion, innovation and improved outcomes.

Is this a Key Decision?

No

Does the call-in procedure apply?

Yes

Declarations of interest (including details of any relevant dispensations issued by the Standards Committee)

None

Published

12 June 2026

Signed: _____ Date: _____
Leader of Torbay Council on behalf of the Cabinet

Record of Decisions

Social Mobility in Torbay - Report of the Overview and Scrutiny Board

Decision Taker

Cabinet on 09 June 2026.

Decision

That the Cabinet's response to the Social Mobility in Torbay - Report of the Overview and Scrutiny Board be approved as published.

Reason for the Decision

The Cabinet was required to respond to the findings of the Overview and Scrutiny Board.

Implementation

This decision will come into force and may be implemented on 22 June 2026 unless the call-in procedure is triggered (as set out in the Standing Orders in relation to Overview and Scrutiny).

Information

The Cabinet received the report of the Overview and Scrutiny Board on Social Mobility in Torbay. In accordance with section D7 of Standing Orders in relation to Overview and Scrutiny as set out in the Constitution, the Cabinet was required to respond to the recommendations of the Overview and Scrutiny Board within two months. Subsequently the Cabinet prepared a response to the recommendations of the Overview and Scrutiny Board which was proposed by Councillor Chris Lewis and seconded by Councillor Tranter and agreed unanimously by the Cabinet, as set out above.

Alternative Options considered and rejected at the time of the decision

None

Is this a Key Decision?

No

Does the call-in procedure apply?

Yes

Declarations of interest (including details of any relevant dispensations issued by the Standards Committee)

None

Published

12 June 2026

Signed: _____ Date: _____
Leader of Torbay Council on behalf of the Cabinet

Meeting: Cabinet

Date: 21 July 2026

Wards affected: Roundham with Hyde

Report Title: Redevelopment of former Crossways Shopping Centre, Paignton for the Delivery of Extra Care Housing

When does the decision need to be implemented? 10 August 2026

Cabinet Member Contact Details:

Councillor Hayley Tranter – Cabinet Member for Adult, Communities, Public Health and Inequalities, Hayley.tranter@torbay.gov.uk <mailto:alan.tyerman@torbay.gov.uk>

Councillor Chris Lewis – Cabinet Member for Place Development and Economic Growth, Chris.Lewis@torbay.gov.uk

Director Contact Details:

Anna Coles – Director of Adult and Community Services, anna.coles@torbay.gov.uk,

David Carter – Director of Regeneration, david.carter@torbay.gov.uk

1. Purpose of Report

- 1.1. The Crossways redevelopment is a cross-Council project, bringing together Adult Social Care, Housing and Regeneration to deliver strategic outcomes for adult social care delivery, whilst also delivering regeneration in Paignton town centre.
- 1.2 This report seeks approval of the full and final Business Case.

2. Reason for Proposal and its benefits

- 2.1. The development of sheltered housing with integrated health and social care services, known colloquially as 'extra care housing', along with the reprovion of specialist resources for people with profound and multiple learning disabilities remains a key part of the Council's market transformation strategy to meet future care market demand of the next 20 years.
- 2.2. With regards to the supported housing needs of cognitively / physically frail older adults and adults of working age with disabilities, ongoing engagement with people that draw on social care services indicates that they would rather continue to live in a home of their own, making choices about and having control over the care and support they receive to enable

them to remain independent. This in turn supports the health and social care system to push back the point at which people need to enter more intensive, higher cost services such as residential care, whilst also being a more cost effective model for delivering services to vulnerable people because it offers a specifically designed supportive environment and limits staff travelling miles to deliver care.

- 2.3. Built on engagement carried out in 2016/17 by Housing LIN for Torbay Council, taking a long view of specialist housing demand for adults drawing on health and social care, the Blueprint for Market Transformation in Torbay: Adult Social Care Commissioning 2020 to 2030 sets out a high-level summary of the planned outcomes, outputs and activities required to meet adult social care needs across Torbay in line with ongoing demographic demand, changing customer expectations and current social policy locally and nationally, in order to meet the Council's duties towards the social care market under the Care Act 2014:
- Enabling more people to be healthy and stay healthy;
 - Enhancing self-care and community resilience;
 - Integrate and improve community services and care in people's homes; and
 - Deliver modern, safe and sustainable services.
- 2.4. The delivery of the Crossways scheme as a development of modern, purpose-built supported apartments will make a significant contribution to the Council's stated target of 200 additional extra care apartments by 2030, and will support the delivery of a more outcome focussed and financially sustainable care offer in Torbay.
- 2.5. With regard to the provision of specialist day support for adults with profound and multiple disabilities in Torbay, there is an increase in demand for these services and people live longer and more young adults enter the adult social care system with a range of complex physical, developmental and behavioural disabilities requiring specialist support and a specially designed environment. The modern dedicated provision being planned for the Crossways site will support adults being supported at home to develop skills for independence and to receive a range of commissioned meaningful daytime activities to support their health and wellbeing. At the same time, the service will ensure that those caring for people with profound disabilities receive the respite that they need to maintain their caring responsibilities.
- 2.6. The NHS Trust operates a day care centre at Hollacombe, Paignton, to provide support for local adults with complex Learning Disabilities. This is known as Hollacombe Community Resource Centre (CRC) and is a specialist facility, providing activities, food, support and therapy to some of our most vulnerable members of society.
- 2.7. The buildings that Hollacombe CRC utilise has reached 'end of life' and due to the nature and composition of their prefabricated construction, it is not feasible to extend operational use beyond the next few years. Without a new site coming on stream shortly, the facility would be forced to close, which would be to the detriment of residents. This facility is considered important in providing health & wellbeing outcomes for vulnerable members of our community.

- 2.8. Additionally, providing a new facility will allow support for a larger cohort than the current building is able to. The new Centre has been designed to support up to 50 adults with profound and multiple Learning Disabilities, 5 days per week, representing an increase of 35% in capacity compared to current provision. In addition, the new centre will be able to support the wider learning disability and autistic community of Torbay by hosting evening and weekend activities run by a range of service providers.
- 2.9. This report seeks approval of the Final Business Case in accordance with the decision of Full Council on 14 May 2026.

3. Recommendation(s) / Proposed Decision

3.1. That Cabinet:

- (i) Approve the Final Business Case for the scheme as shown in Appendix 1, which includes the full and final build cost and projects costs, with a breakdown of the funding (including internal capital resources, external grant and secured capital receipts).

Appendices

Appendix 1 – Full Business Case

Appendix 2 - Value for Money report from Coreus (Exempt)

Background Documents

- Cabinet and Council Report 12 and 14 May 2026 available here:
<https://www.torbay.gov.uk/DemocraticServices/ieListDocuments.aspx?CId=741&MId=24498&Ver=4>

4. Introduction

- 4.1. Further to the decision of Full Council on 14 May 2026, this report seeks the approval of the Final Business Case for the Crossways Site in Paignton.
- 4.2. Torbay – along with most of the country, currently faces acute housing challenges, caused largely by the successive challenging housing and economic market conditions we have seen since the Covid pandemic in 2020. These market conditions have reduced developer and investor confidence and led to a slowdown of commercially driven housing growth. This has a knock-on impact on the supply of new affordable housing, and general ability of the sector to maintain construction rates, leading to a decline in overall market conditions.
- 4.3. The impact is arguably most acutely felt by those in need of housing with linked care and support. Extra Care housing is considerably more expensive to deliver than standard market or general needs affordable housing because it requires additional facilities in respect of communal/shared spaces, as well as enhanced facilities within individual homes.

Extra Care Housing is generally only provided by market housing providers as ‘executive style’ housing, or by Registered Providers/Local Authorities as part of grant funded programmes with Homes England.

- 4.4. With market conditions as they have been, developers have been hesitant to take on the commercial risk of new such development in marginal value areas like Torbay (and this would not cater to the local need anyway); similarly, the local Registered Provider sector has significantly reduced output of new directly delivered homes in recent years (including specialist housing).
- 4.5. The approval of the Final Business case will see a scheme brought forward for delivery that supports a number of other key local and national strategic aims:
- Torbay Council Housing Strategy: directly contributes to the objective of “delivering more, better and affordable homes”, unlocking new supply and promoting inclusive growth.
 - Torbay Local Plan: supports policy aims around sustainable development, brownfield land use, and meeting identified housing needs, as well as increasing the number of homes built in the early part of the new Plan period.
 - One Torbay: Working For All: The Corporate Plan emphasises inclusive communities, fairness, and tackling deprivation. The proposed scheme offers good quality affordable homes in a high-demand area to people that need care and support, who can find that housing becomes increasingly unaffordable as they age.
 - Devon Home Choice: The homes will be allocated to local people in housing need.
- 4.6. This scheme is one of several proposals that have come to Cabinet in recent months and mark a turning point in Torbay Council’s approach to tackling housing challenges head-on. It further demonstrates our commitment to using our resources proactively and strategically to meet the needs of our communities. The scheme represents:
- Direct intervention in the housing market to unlock underutilised land.
 - Provides much needed Extra Care accommodation which works alongside Adult Social care to reduce/mitigate the economic impact and keeps more people living independently, for longer.
 - Leadership in place-regeneration, in a coastal town with limited development opportunities and a high street in need of activation.
 - A model of how we can work proactively within the private sector to kick-start the local construction sector and wider economy to meet our social, environmental and spatial priorities.
 - A strong signal of commitment to Paignton and to working in partnership with our appointed Regeneration Partner to boost investment in the local economy when overall confidence in the housing market is low.
 - The Council strengthens its reputation as a progressive, forward-thinking authority willing to take action to stimulate growth where market-led delivery is stalling.

5. Options under consideration

- 5.1. Acknowledging the approval by Full Council to uplift the Capital Programme and to approve Prudential Borrowing to deliver the project, the options at this stage are; **Option 1** – approve the Recommendations as set out and proceed to deliver the scheme for the Crossways site. **Option 2** is not to proceed, effectively stepping away from the opportunity to bring forward a brownfield site to support the local housing market. This will avoid capital risk but will not improve the housing situation and will be less likely to secure delivery of the site to meet Local Plan targets in the medium term. It would be reputationally damaging for the authority in respect of a project that has wide political support and is supported for this use by the vendor. It would also mean Torbay misses an opportunity to increase its social housing stock and would place enhanced risk on the Council in respect of grant that has been secured specifically to deliver the project from the Brownfield Land Remediation Fund/Future High Streets fund etc.
- 5.2. Officers recommend proceeding as set out in **Option 1**.

6. Legal Implications

- 6.1. The Council has previously completed the acquisition of the site utilising a Compulsory Purchase Order. The legal implications of this were fully considered through this process, and at the time of acquisition.
- 6.2. Within the identified risks of the scheme are Rights of Light and access rights of existing neighbouring properties. As such this report seeks approval to levy the Council's Planning Appropriation Rights under Section 203 of the Act to the site. This protects the scheme from injunction by any of the forementioned parties.

7. Engagement and Consultation

- 7.1. The community has been consulted throughout the planning process as well as at regular events since the scheme's inception in 2021.
- 7.2. Additional engagement will be undertaken throughout the pre-construction and construction period. This will mainly focus on the community within the affected ward and is also expected to extend to schools and community groups.
- 7.3. The Project Team has liaised extensively with the staff and service users of the current Hollacombe CRC, and all are aware of the proposals and our ambitions for the site.
- 7.4. The Head of Strategic Housing & Delivery and Director of Regeneration have extensively briefed the Portfolio Holder for Housing and Finance and the Deputy Leader - and the other Cabinet members in advance of this proposal. The Shadow Cabinet Member has also been briefed regularly.
- 7.5. Senior Council officers have also been made aware of the proposal through the Capital & Growth Board and Housing Capital Programme Board.

8. Procurement Implications

- 8.1. This project falls under the Procurement Act 2023. Therefore, a formal procurement procedure is required, to reflect the size of the investment (and associated risk).
- 8.2. Willmott Dixon Construction Limited have been appointed via a directly awarded Pre Construction Services Agreement through the Pagabo Major Works Framework, on an open book basis. This framework aligns with Gold Standard principles and is compliant with procurement regulations. Willmott Dixon Construction are then obliged to suitably procure any relevant sub-consultant/contractor services necessary to deliver the scheme.
- 8.3. The final construction contract will be awarded as the next work stage of the above framework route.
- 8.4. In addition to this the Council will still comply with its own internal Contract Procedure Rules and demonstrate best value in line with the Local Government Act 1999, this includes:
 - Evidence that the acquisition and development represents value for money;
 - A clear and transparent decision-making process; and
 - Appropriate financial and legal due diligence.
- 8.5. The Council has obtained a Value for Money report from Coreus, an RICS accredited firm of Quantity Surveyors, to provide assurance of the construction sum. A copy of the final report is set out in Appendix 2.

9. Protecting our naturally inspiring Bay and tackling Climate Change

- 9.1. The proposal outlined represents an opportunity to embed climate-conscious, environmentally responsible and sustainable design principles into the fabric of our built environment. It supports Torbay Council's declared Climate Emergency and the subsequent Climate Emergency Action Plan by creating homes that are low-carbon, environmentally sustainable and cost effective to live in, while preserving the character and ecological integrity of the Bay.
- 9.2. The development will be delivered in accordance with current best practice in sustainable construction and environmental protection, delivering:
 - Energy-efficient homes: The development will be designed to at least meet minimum Building Regulations, with a focus on enhanced fabric performance (insulation, air tightness, and glazing) to reduce energy consumption and fuel poverty. If further enhancements can be viably delivered above the minimum standards at the point of delivery, they will be. The project team anticipates achieving an EPC rating of B overall.
 - Low-carbon building materials and methods: The scheme will promote the use of sustainable, low-emission materials and modern methods of construction (MMC) where possible to minimise environmental impact.

- Renewable energy and futureproofing: The project will include the integration of solar panels, energy-efficient heating systems (e.g. air source heat pumps), and electric vehicle (EV) charging infrastructure to support low-carbon lifestyle for residents. The scheme will be delivered without recourse to carbon-intensive space and water heating (i.e. “no gas”).
- Sustainable transport: Residents will have good access to public transport will reduce car dependency, in line with sustainable travel objectives.

9.3. Climate change disproportionately affects vulnerable populations. Providing safe, secure, and energy-efficient housing contributes to climate resilience by reducing exposure to extreme weather conditions; helping low-income households better manage rising costs; and support equitable access to housing that meets modern environmental and health standards.

10. Associated Risks

10.1. There are risks associated with any commercial activity. However, the risks associated with this scheme are described throughout this paper.

11. Equality Impact Assessment

Equality Act Protected characteristics and groups with increased vulnerability	Data and insight	Equality considerations (including any adverse impacts)	Mitigation activities	Responsible department and timeframe for implementing mitigating activities
Age Page 32	There are 139,479 people in Torbay (ONS Mid-Year Estimate 2022), and 1 in 4 are aged 65 or over (36,612 people, or 27%) which is higher compared to across England (where the 65s and over make up 18%). By 2043, it is estimated that over one in three (34%) of Torbay's population will be aged 65 years and over (52,033), compared to 24% across England.	This purpose-built accommodation will reduce the need to go into a residential care home in the early stages of a resident's care need increasing. Extra care housing comprises self-contained homes with design features and support services to enable independent living. Communal facilities will provide opportunities for social interaction and help combat social isolation, a long-standing challenge for aging populations. The Scheme meets the needs of the Adult Social Care Team to support people to live independently, as long as possible.	Consideration during the letting process to ensure benefit of this accommodation is maximised for those that need it most. The importance of non-institutional design has been emphasised throughout the design process, avoiding clinical aesthetics, promoting a sense of dignity and home.	Housing Management

Carers	At the 2021 census there were 14,900 unpaid carers in Torbay. 5,185 of these provided 50 hours+ of care. 4.8% of over 5's within Torbay were identified as carers in the 2021 survey.	The Extra Care Scheme may provide relief for carers to support their wellbeing.	Not applicable	Adult Social Care
Disability	In the 2021 Census, 23.8% of Torbay residents answered that their day-to-day activities were limited by a physical or mental health condition or illness. The Torbay Joint Strategic Needs Assessment highlights that two-thirds of adults aged over 65 are expected to be living with multiple health conditions (multi-morbidity) by 2035. Seventeen percent would be living with	Extra Care Housing supports a range of people. Some may have a disability and or physical/ mental health needs. It supports people to live independently with additional on-site support. The level of support available can be tailored to meet the needs of the resident, meaning that the model is more flexible than domiciliary care. The design of the building will be accessible and have level access and lift provisions. This will sit alongside thoughtful design which will promote wellbeing and amenity spaces suitable for mobility equipment. Additionally, an inclusive design has been considered for neurodivergent residents, with consideration given to	Considerable emphasis has been given to creating a space that meets service user needs, is fully accessible and is a welcoming and inclusive. The scheme complies with the M4 (2) and M4(3) standards, which outlines space requirements and accessibility for dwellings. These standards ensure the facilities are suitable for users with reduced mobility. The project team accompanied the architect PRP to view existing extra care facilities with Barnet Council. Viewing these operational facilities assisted in understanding the complex needs	Adult Social Care

	four or more diseases, double the number in 2015. One-third of these people would have a mental illness like dementia or depression	colour palates and other interior qualities.	of the end user and how spaces need to work in practice. Particular focus on dementia friendly design, use of colour coded floors and personalised objects to assist in navigation of the building for example.	
Gender reassignment	In the 2021 Census, 0.4% of Torbay's community answered that their gender identity was not the same as their sex registered at birth. This proportion is similar to the Southwest and is lower than England.	No adverse impacts are anticipated. Staff will receive training to ensure that they treat all residents and colleagues with respect and dignity.	Not applicable	Housing Management & Adult Social Care
Marriage and civil partnership	At the 2021 Census, 44.2% of people were married or in a civil partnership.	There will be a mix of apartment sizes which will cater for single and multiple occupancy homes with varying living arrangements.	Not applicable	Housing Management
Pregnancy and maternity	There has been a notable fall in the numbers of live births since the middle of the last decade across all geographical areas.	Residents will not be excluded from Crossways based on pregnancy/maternity status, if they otherwise meet the requirements of the scheme. However, other schemes may be more appropriate for	Not applicable	Not applicable

		eligible households with this additional requirement.		
Race	In the 2021 Census, 96.1% of Torbay residents described their ethnicity as white. This is a higher proportion than the South West and England. Black, Asian and minority ethnic individuals are more likely to live in areas of Torbay classified as being amongst the 20% most deprived areas in England.	No adverse impacts are anticipated. Staff will receive training to ensure that they treat all residents and colleagues with respect and dignity.	Not applicable	Housing Management & Adult Social Care Teams
Religion and belief	64.8% of Torbay residents stated that they have a religion in the 2021 census.	No adverse impacts are anticipated. Staff will receive training to ensure that they treat all residents and colleagues with respect and dignity.	Not applicable	Housing Management & Adult Social Care Teams
Sex	51.3% of Torbay's population are female and 48.7% are male	No adverse impacts are anticipated. Staff will receive training to ensure that they treat all residents and colleagues with respect and dignity.	Not applicable	Housing Management & Adult Social Care Teams
Sexual orientation	In the 2021 Census, 3.4% of those in Torbay aged over 16 identified their	No adverse impacts are anticipated. Staff will receive training to ensure that they treat all residents and colleagues with respect and dignity.	Not applicable	Housing Management & Adult Social Care Teams

	sexuality as either Lesbian, Gay, Bisexual or, used another term to describe their sexual orientation.	The British Attitude Survey highlights that 67% of people think a relationship between two people of the same sex is never wrong, compared to 17% in 1983. However, the reports suggest that the figure decreases for those in older population groups. The above training and understanding of discrimination will assist management.		
Armed Forces Community	In Torbay, 5.9% of the population have previously served in the UK armed forces. This is higher than the average for England (3.8%).	No adverse impacts are anticipated. Staff will receive training to ensure that they treat all residents and colleagues with respect and dignity.	The design team includes ex-armed forces and reservists; their input has been part of the design process.	Housing Management & Adult Social Care Teams
Additional considerations				
Socio-economic impacts (Including impacts on child poverty and deprivation)	Torbay's economy is ranked among the weakest in England. Average wages continue to be significantly below the regional and national average with less of the population in full-	The Scheme provides affordable housing for some of the most vulnerable in our society.	The extra care scheme will be creating management jobs, and the Holcombe facility will retain the staff numbers.	Housing Delivery Team

	time employment than England.			
Public Health impacts (Including impacts on the general health of the population of Torbay)		Pollution	The scheme has significant resident amenity spaces, and residents are less likely to be car-users than the general public. Nearby bus stops promotes sustainable travel, supporting access to the community.	Public Health Teams
Human Rights impacts		No human rights impacts are anticipated. Residents will have an ASC assessment in line with best practice where required.	Not applicable	Not applicable
Child Friendly	Torbay Council is a Child Friendly Council, and all staff and Councillors are Corporate Parents and have a responsibility towards cared for and care experienced children and young people.	Due to the nature of the scheme, and the care requirements that will be part of the selection process for tenants, this scheme is unlikely to support families with children. However, the Council is actively bringing on stream a number of other housing initiatives specifically designed for this cohort, that would be better suited to families that include children.	Not applicable	Housing Delivery Team

12. Cumulative Council Impact

- 12.1. An increase to the Council's portfolio of social housing, which requires ongoing management etc. However, allowances are always made in the financial modelling to ensure the long-term, appropriate management and maintenance of our housing stock.

13. Cumulative Community Impacts

- 13.1. The provision of additional affordable accommodation will reduce future pressure on having to pay for expensive residential care placements when they are not really required. The whole purpose of this and similar schemes is to provide a stock of homes that are designed to help people live independently for as long as possible. To that end, it is worth noting that the project has the specific support from colleagues in the Adult Social Care team, as it will help them manage demand on their services, and provide efficient care services to a number of households in a single location.
- 13.2. There would be significant positive impact on local communities by addressing long-standing housing-needs, improving the quality of life for vulnerable residents, and contributing to the overall sustainability and cohesion of neighbourhoods within Torbay.
- 13.3. Keeping residents in Torbay ensures continued local spending and engagement with small businesses, schools, GPs and community services, as well as paying rental income to service the debt associated with the construction.

Crossways, Paignton

Tier 3 Full Business Case (FBC)

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Version 1.0	Name	Date
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Reviewed by:	Sam Irving	30/07/2026
Financial Section Approved by:	Andrew Sherry	30/06/2026
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CGB Approved		

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1 Introduction

1.1 Purpose of this report

This report relates to the redevelopment of the former Crossways shopping centre, Paignton and its immediate surrounds to Hyde Road and Torquay Road. It has been prepared with reference to the Crossways OBC business case (November 2025) and subsequent planning documentation. It should also be cross-referenced with ProVal model: **Crossways_91ECH/DCC_(FBC)_01Jul26**

The following are recommended for endorsement:

- Authorisation to place a contract with Willmott Dixon Construction Limited for the sum of £44.056m based on an NEC4 Option A contract congruent with the Pagabo Major Works Framework terms. This subsumes the relevant PCSA, inflation, and risk pots allocated to construction.
- Authorisation to place an infrastructure contract with South West Water for the sum of £1.673m on a Direct Award, using SWW's standard contract terms (TBC).
- To approve the final project budget of £54.000m based on a maximum Council borrowing of £16.300m which includes all development costs such as acquisition, legacy costs, consultants, build and finance costs. This also includes an additional contingency to balance between the current most likely final account cost and the overall headroom position.
- To endorse the proposed delivery and procurement model set out in this paper.

1.2 Executive Summary

The 0.477ha site is owned by the Council. Originally the site was identified for an 89-unit Extra Care facility, for which a planning consent was granted in February 2021. Demolition of the former shopping centre commenced in 2023 and substantially completed in April 2024. It is currently in-use as a temporary shopper's car park, pending redevelopment.

A fundamental scheme review was undertaken in 2023, following identification that the previous scheme was unviable. Responsibility for delivery transferred to the Head of Strategic Housing and Delivery (as client), with project management and development management services provided by Willmott Dixon / Milligan (WDM). This has culminated in the submission of a new planning application to significantly improve the efficiency of the building and increase units. Additionally, a new Day Care Centre (DCC) has been included, to replace the existing Hollacombe Centre, which is life expired.

The costs to date for the CPO, design and demolition are £6.188m. This includes abortive works of the previously consented scheme.

The scheme has attracted £4.626m of FHSF and £0.950m of BLRF; several other smaller local subsidies have been committed, too, which are detailed in Section 5 of this report. There is also a significant capital and revenue allocation from Adult Social Care (ASC) including Disabled Facilities Grant (DFG) funds and other project specific subsidies. To progress this project, all funds previously allocated to the project at OBC stage are still included.

Following grant of planning consent, the scheme has gone through a detailed design process through to RIBA Stage 4. Some RIBA Stage 3 re-design has also been required, to accommodate a change in approach in respect of the complex drainage solution.

The Design Team, and the SRO/WDM leads consider that the scheme now designed produces the best balance of viability, development ambition, regenerative effect and deliverability and has sought to progress this through to build. Willmott Dixon Construction Limited (WDCL) will be procured for main construction works.

A tranche of pre-construction activity was instructed following approval of the OBC; this has allowed the risk and uncertainties to be reduced through the PCSA process. Additionally, the Council have now also contracted with Coreus to provide Client-side VfM assessment, managing surveyor services, and NEC Supervisor responsibilities, to ensure robust oversight of WDC through the construction/ECI/PCSA phases. The Client has

also sought to finalise the cost plan, such that more detailed engagement with Homes England may commence, to secure the required grant funding.

The Total Scheme Cost (including land assembly, on-costs and all contingencies) is now £54.000m.

Within the above, is sufficient allowance to instruct necessary sewer diversion or build over works to allow a prompt start on site as an Enabling Works Package.

2 Strategic Case

2.1 The case for change

2.1.1 Existing arrangement

This has been previously considered at SOC and OBC and is not being re-examined at FBC stage.

- The current asset has been demolished.
- Land being utilised as a deck level car park to minimise the loss of parking at Victoria Centre.

2.1.2 Business needs – current and future

This has been previously considered at SOC and OBC and is not being re-examined at FBC stage.

- The brief for the scheme is for a residential led (Extra Care) mixed-use development.
- Aging demographics result in demand for Extra Care apartments.
- Delivery of Extra Care Apartments reduces cost and operation burden on Care facilities.

2.1.3 Strategic need

2.1.3.1 Corporate & Community Plan alignment

This has been previously considered at SOC and OBC and is not being re-examined at FBC stage.

- Crossways is viewed negatively and symbolises wider decline in Paignton town centre due to its poor condition and inactivity.
- Redevelopment is critical to town centre regeneration, helping to increase land values, attract private investment, boost footfall and spending, and improve safety and reduce crime.
- Paignton is Devon's fourth largest town, with population projected to grow by 10% by 2030; smaller household sizes mean more homes are needed.
- Limited greenfield land (due to natural constraints) makes town centre housing development essential to accommodate growth and revitalise the area.
- The town has an ageing population and strong demand for retirement living, care homes, and accessible housing close to amenities.
- Town centre's flat layout, transport links, and proximity to services make it particularly attractive for older residents.
- Demand for town centre living has been increasing and is expected to accelerate as regeneration progresses.
- Crossways and Victoria Centre residential schemes will help meet demand, attract younger families and professionals, and support economic growth.
- There are currently no other major town centre developments planned, making these schemes key investment opportunities.
- New homes are expected to let quickly and at higher rents due to strong and growing demand over the next 5–10 years.
- Redevelopment will raise land values, attract residents, increase vitality, and reduce crime/fear of crime.
- Project aligns with Future High Streets Fund objectives, including land acquisition for housing and supporting higher-density residential development.

2.1.3.2 Other relevant strategies

This has been previously considered at SOC and OBC and is not being re-examined at FBC stage.

This project supports Torbay Council's Economic Recovery Plan. This sets out Torbay's proposed response to the economic challenges facing the community following the Covid-19 pandemic.

The Torbay Community and Corporate Plan sets out the Council's ambition and vision for a prosperous and healthy Torbay. A priority area in the plan involves being the premier tourist resort in the UK, which relies on regenerating and re-inventing the town centre. Additionally, the plan aims to improve the delivery, affordability and quality of housing and to promote good mental and physical health, in turn reducing the occurrence of preventable illnesses.

FHSF funds has been used for the compulsory purchase of the site, demolition and preparation of the site. This then enables the redevelopment of the site.

The masterplan promotes:

- Key urban locations for mixed use regeneration including major retail, leisure, cultural, and recreational opportunities
- Employment, health and housing provision as well as a careful scaling back of secondary shopping areas.
- The re-use of under-utilised floorspace, above existing businesses, as a source of employment space and housing supply.

2.2 Objectives

Challenge	Objective	Measure	Target
Oversupply of poor-quality retail space	Condense retail offer and diversify land use	Less retail space and increase in other uses in town centre	Better-quality high-street experience
Lack of housing and increasing deprivation	Provide access to high quality housing	Increase in residents living in good quality housing	Reduced poor quality housing
Improving Paignton's image	Improved residential and health offer	Investor confidence; existing and new establishments	Increased investment activity
Replacement Day Care Centre	Purpose-built replacement facility	Delivery of said facility	Quality provision to allow service to flourish

2.3 Legal considerations

The Council has previously completed the acquisition of the site utilising a Compulsory Purchase Order. The legal implications of this were fully considered through this process, and at the time of acquisition.

Any construction project comes with risk, which is often directly related in scale to the quantum of the undertaking in question. The risk of this project is commensurate with the project's overall Total Scheme Cost of £54.000m, and reflecting the site specific issues such as complex ground works, implications of the Building Safety Act, and ability to redevelop a constrained, town centre site in this way.

Construction of the scheme will be secured through an NEC-A form of contract through the Pagabo Major Works Framework to WDCL. NEC-A requires the Council, as landowner and contracting organisation, to secure a suitably qualified NEC Supervisor to administer the contract on our behalf. These services will be procured from Coreus, a Devon-based specialist form of capital projects project management services, with particular expertise in the delivery of social housing. Coreus are supporting a number of the Council's other social housing projects with the Client Team, too.

Construction projects of this nature require the Council to adhere to a number of duties as a responsible customer under the CDM Regulations 2015. The main duties revolve around the requirement to appoint appropriately qualified stakeholders to undertake the statutory roles of Principle Designer and Contractor. Both of these roles will remain with WDCL who have extensive experience in this field.

Similar requirements to the CDM Regulations 2015 are imposed by the Building Safety Act 2022. Again, the Principal Designer Role will remain with WDCL who will ensure compliance throughout the process. It is important to note that Torbay Council will remain as the 'client' duty holder with the appointed Principal Designer considered to be an appropriately qualified body.

Once the build contract has been completed, neither the Council nor Wilmott Dixon Construction can withdraw without considerable penalty. The appointment of the contractor will require limited legal resource due to the utilisation of standard forms/contracts through the Pagabo Major Works Framework and the nature of the procurement that has already been undertaken. The Council's legal team will however review the contracts to ensure commercial and legal risks are mitigated, with specialist/external advice where necessary.

The Council remains liable for the management of the asset until such time as contracts have been signed and responsibility for the site has transferred to Wilmott Dixon Construction. As such, the Council must ensure that an adequate asset management strategy is in place to protect the Council's interests and the public in respect of Health and Safety etc. until such time as responsibility has been transferred to our contracting partner.

In the long term, the Council will need to grant leases/management agreements to the NHS and any other care and support providers/other relevant providers delivering services within building, in due course.

Within the identified risks of the scheme are Rights of Light and access rights of existing neighbouring properties. Cabinet have endorsed the use of Section 203 of the Housing and Planning Act 2016 to appropriate the necessary Rights. This process will need to be completed before triggers are breached, and would protect the Council from injunction by any of the relevant parties. A legal view was procured from Addleshaw Goddard and is included within Appendix E.

2.4 Other considerations

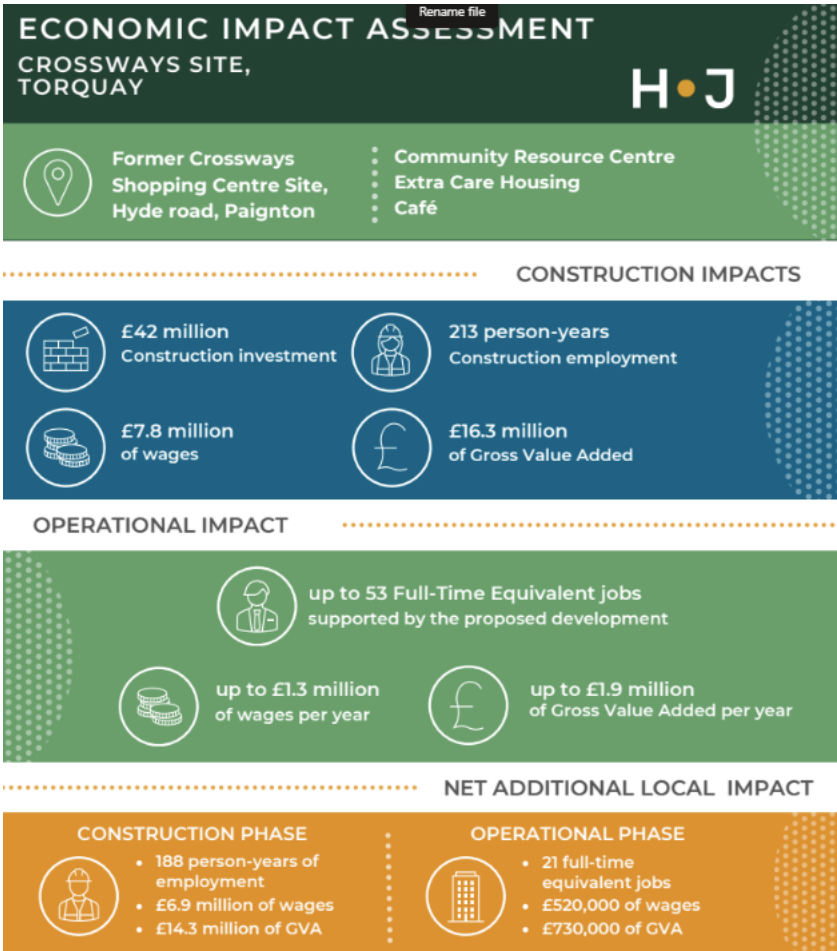
The scheme has been designed to meet a range of needs identified by Adult Social Care, including homes for people to age-well and provision of a bespoke day care facility to replace an end-of-life scheme that is central to the partnership between Torbay Council and the local NHS trust.

3 Economic Case

3.1 Critical success factors

This has been previously considered at SOC and OBC and is not being re-examined at FBC stage.

WDM and Torbay Council commissioned Hardisty Jones to review the socio-economic impacts of bringing forward the scheme. The resulting report of which is appended to this report details the key benefits of the chosen scheme as summarised below:



3.2 Options considered

At SOC and OBC stage, a series of preferred options were identified with a decision made to proceed with 91 Extra Care units and a Hollacombe replacement to RIBA Stage 3 and Planning Application. A significant level of design development was undertaken, which has resulted in a finalised scheme approved at OBC.

3.3 Preferred option

This has been previously considered at SOC and OBC and is not being re-examined at FBC stage.

- 91 Extra Care apartments for Social Rent.
- Replacement facility for the Hollacombe Day Care Centre
- Activation of both Hyde and Torquay Road high street locations.



3.4 Climate Impact Assessment

The scheme has been designed to far exceed the current building regulations for Part L. This has been achieved by ensuring energy use is kept to a minimum by inclusion of Photovoltaic panels to the roof, mitigating any fossil fuels through the introduction of Air Source Heat Pumps whilst also ensuring a fabric first approach to the building.

In addition to the climate impact through energy use the scheme adopts the highest standards to waste water attenuation by ensuring the flow rate is 2 litres per second through site attenuation systems, thus minimising flood risk in the existing SWW system.

4 Commercial Case

4.1 Procurement overview

4.1.1 Procurement undertaken

A Pre-Development Agreement (PDA) was agreed with WDCL for the site to facilitate its immediate progression. The PDA has acted as the delivery mechanism for all activity on the scheme to date (with all current team members procured pursuant to the PDA).

Consideration has been given to appoint WDCL on Construction phase given their project knowledge through development. Review of procurement options identified that this would be possible via the Pagabo Major Works framework. This was proposed to CGB at OBC stage and subsequently approved.

To develop the contract sum and RIBA Stage 4 pack, WDCL were appointed to undertake the works associated under an ECI/PCSA within the existing PDA structure. At the delivery stage the PDA is to be replaced with a Development Management Agreement (on identical commercial terms to the PDA) to facilitate the delivery of the scheme through Development and Project Management (this process is set out in the PDA).

WDCL will be appointed as main contractor utilising the Pagabo Major Works Framework, which will sit alongside the DMA. Torbay Council's Commercial Services team have highlighted the risks associated with a Direct Award for this scale of contract; however, the commercial analysis undertaken and the wider public cost-benefit position concurs that there would be little benefit to reverse or revisit the procurement strategy at this juncture.

A schedule showing the basis of the assumptions for the input metrics to the Development Appraisal is below:

Metric	Data Source/Basis of Calculation
Acquisition Cost	Based on purchase costs incurred (provided by TC).
Construction Cost	Based upon Willmott Dixon Construction Not to Exceed costs (and assessed for VfM compliance for TC by Coreus)
Planning Cost	Planning costs incurred have been utilised.
Professional Fees	Actual costs incurred plus cost estimates where required (based on quotations) from the core team, along with benchmark data from other projects.
Finance	Assumed debt finance based on long-term PWLB borrowing by TC at a rate of 4.65%, utilising a repayment loan model, modified to include an interest-only provision for the first full year, with subsequent loan principal repayments increasing in line with uplifts in the rent receipts in order to repay the full amount of debt within the 50-year loan period (as agreed by Cabinet).
Residential Sales and Rental Values	Residential values have been provided by Vickery Holman based on 1999 social rental values to produce Target Rents in accordance with the requirements of the Regulator of Social Housing. Social rents have been uplifted by an agreed 10% uplift from base to reflect their tenure as social rented Extra Care housing.
Commercial income	Assessment of market rents and incentives provided by Vickery Holman.
Investment Yields	Assessment of market investment yields for anticipated uses by Vickery Holman.

Growth	Both cost and value growth have been included in the appraisals advised by Coreus and Vickery Holman: - Construction cost inflation estimated to mid-point of construction. - Value growth estimated to exit/sales point.

4.1.2 Results of procurement

TC have entered into a Pre Development Agreement with WDM through the Pagabo Developer Led Framework, which provides the necessary Development Management and Project Management Services to deliver the project. At the next stage this will be updated to a Development Management Agreement.

Procurement of the professional and design consultancy team to date, which has been necessary to progress the concept design and Planning Application, has been done pursuant to the linked Pre-Development Agreement. The works will be procured through a compliant framework route namely the Developer Led and Major Works frameworks.

A core external development team has been assembled and will be expanded as the development continues.

Discipline	Entity
Principle Contractor	Willmott Dixon Construction Limited
Water Diversion	South West Water – Appointed direct by the Council
Project Management/Cost Management/VfM/monitoring-EA/NEC Supervisor	Coreus

Procurement of construction related services will be required to facilitate diversion of the mains sewer with South West Water. The rationale for procuring a separate Enabling Works contract is that these works can be undertaken more quickly than a Main Contract and therefore will potentially facilitate a quicker start on site. Furthermore, if included within the Main Construction Contract, these works would likely be subject to higher preliminary and overhead costs associated with the larger contract. Additionally, due to the precise nature of the topographical levels associated with these works the wider team have advised SWW are asked to complete the works.

4.1.3 Preferred contractor / supplier

Enabling Works Contract (South West Water)

- Output: A robust contract sum.
- Process: Direct Appointment due to lack of competition in utilities market.
- Procurement Programme: Approx 2 months.

The formal legal and administrative process for this procurement process would be carried out by TC with full technical/commercial support from WDM pursuant to the PDA.

Main Building Contract

- Output: A Building Contract and market tested Gross Maximum Price contract sum with WDCL on an open book basis secured on a lump sum at formation of contract.
- Process: Pre-Construction Services Agreement (ECI/PCSA) issued under the existing Project PDA leading to the main contract to be let by Direct Award under Pagabo Major Construction Works Framework.
 - Pagabo Major Works Fee of 0.22% payable through construction.
- Procurement Programme: approx. 1 month. To finalise contract terms and ensure all parties are comfortable prior to enabling and main works.

The formal legal and administrative process for this procurement process has been carried out by TC with full technical/commercial support provided by WDM pursuant to the PDA.

The ECI/PCSA was an open-book process whereby a contract sum was established by tendering all the construction works packages to the supply chain and applying pre-procured rates for Preliminary Costs and OH&P to the aggregate of the package costs.

It was also necessary to have the process/output audited by a 3rd party cost consultant to confirm the output was market tested and VFM. This service was employed directly by the Council, having been directly awarded to Coreus, based on their existing (very detailed) knowledge of the project.

4.2 Contract value

WDCL - £44.056m (Subsuming the PCSA, risk and inflation assessments)

SWW - £1.673m

Coreus - £0.070m-£0.080m

4.3 Contractual arrangements

Enabling Works Contract

- Client: Torbay Council
- Form of Contract: SWW agreement appropriate for the value of works.
- Approx Value: £1.673m
- Duration: Circa 6 months (including design & mobilisation)
- Payment: Monthly
- Contractor provides a Guaranteed Maximum Price

Cost Consultant & NEC Project Manager and Supervisor

- Client: Torbay Council
- Supplier: Coreus
- Form of Contract: Direct appointment via a framework using framework terms or Council short form service contract
- Approximate Value: £339,709 for the Construction Period (anticipate above threshold service contract)
- Duration: 33 months
- Payment: Monthly

Main Building Contract

- Client: Torbay Council
- Form of Contract: NEC-4 Option A
- Approx Value: £44.056m (Subsuming the PCSA, risk and inflation assessments)
- Duration: 90 Weeks
- Payment: Monthly (based on valuations)

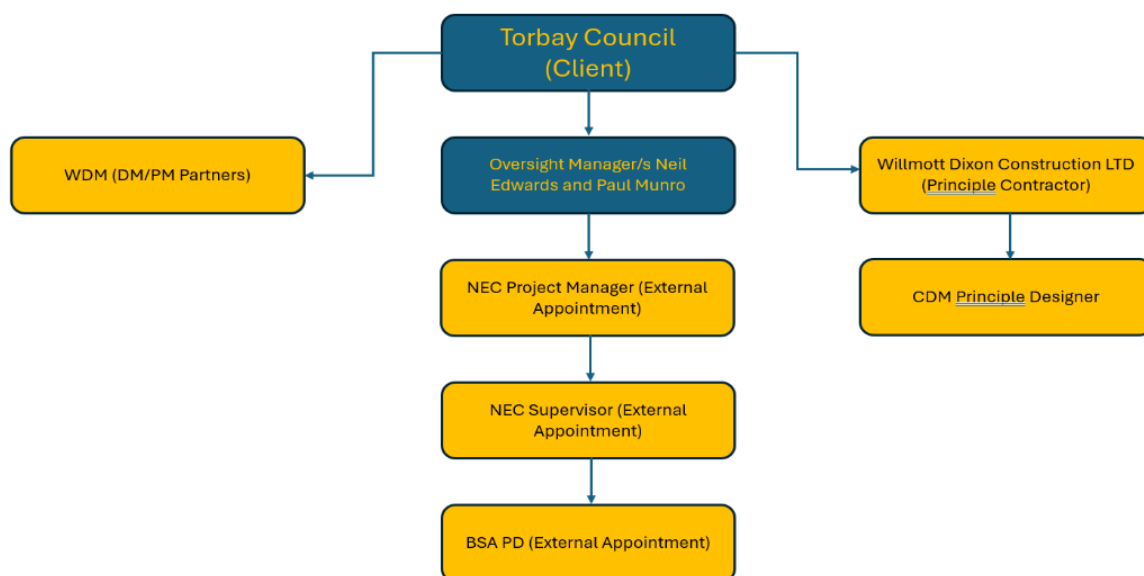
4.4 Contract management

Up to the point of commencement of the Building Contracts the development process has to be managed by WDM pursuant to the PDA (as has been the case up to now). From the commencement of procurement, the Council will become responsible for the management of the project, with Coreus acting for the Council in respect of EA/NEC Supervisor roles, as well as Clerk of Works and QS/PM services (as required).

The form of contract utilised for the construction has been confirmed as NEC4 Option A, because:

- Extensive shared experience in delivering schemes under this form of contract.
- Provides cost certainty.
- Contract utilised across the market for complex schemes.
- Simple process when utilising the Sypro software to manage change.

Through discussions with internal and external stakeholders the below management structure has been shaped based upon the utilisation of an NEC4 Option A Contract. This form of contract demands unique roles which Torbay Council have a duty to ensure are met to ensure the efficient running of the contract and mitigation of risk.



4.5 Social Value

On the formation of the Regeneration Partnership a Legacy Board was formed to create a structure of how social value and legacy would be shaped and delivered. The group separated these elements into three distinct areas to allow control of the outputs.

- Placemaking – Shaping places and ensuring the built form we bring forward is suitable for current and future generations.
- Social Value – Ensuring our works and actions maximise the positive impact to our communities.
- Legacy – Ensuring all decisions are made with shaping the future prosperity of the Bay.

Below is a summary of the KPIs that have been put in place with WDM and Lucy Lewis of TC.

TC SV Theme	Sub-theme	Outcome	Output / Metrics
Community & People	Community Cohesion & Safety	Community Safety & Crime Prevention	Raising awareness of domestic abuse and crime prevention Community safety awareness sessions
		Inclusive Engagement	Co-designed local projects or events
		Community Initiative support	Donations/support for community initiatives Volunteering hours supporting community projects
	Employment, Inclusion & Skills	Access to employment opportunities	Job starts for priority groups Local residents hired
		Skills, Training & Qualifications	Apprenticeship and T Level placement weeks Training leading to recognised qualifications Digital inclusion and essential skills training
		Careers Education, Information, Advice & Guidance (CEIAG)	Careers IAG hours in schools and colleges Careers talks, curriculum support and school outreach Mock interviews, CV support and mentoring
		Inclusion for Under-represented and Priority Groups	Employment and training for under-represented groups
		In-Work Support, Retention & Progression	Coaching support through the first weeks of work

TC SV Theme	Sub-theme	Outcome	Output / Metrics
			In work coaching for new starters
			In work progression support
			Health and wellbeing interventions
			Wellbeing support for employees
			Equality, Diversity and Inclusion (EDI) training hours
	Inclusion, Equalities & Vulnerable Groups	Improved Equality, Diversity & Inclusion Awareness	Equality, Diversity and Inclusion (EDI) training hours
		Fair & Inclusive Recruitment Practices	Inclusive recruitment practices
		Recruitment into fair working conditions	Recruitment into fair working conditions
		Increased Access & Inclusion for Vulnerable and Under-represented Groups	Programmes improving digital skills access
			Removing workplace barriers for under-represented groups
Pride in Place	Heritage & Culture	Heritage & Culture	Volunteer hours at heritage sites
Economic Development	Inclusive Growth & Tackling Inequality	Improved Representation of Priority Groups	Actions to improve representation of priority groups
		Increased Workplace Flexibility & Accessibility	Flexible working availability
		Transparent and Fair Pay	Pay gap reporting
	Responsible Procurement & Local Business Growth	Supporting Local Business Capacity & Growth	Business mentoring hours for SMEs
			Spend with SMEs and local suppliers
	Skills Pipeline & Future Workforce	Supply Chain Opportunities	Spend with VCSEs
			Open advertising of subcontract packages
			Supply chain development actions
		Access to Skills and Learning	Digital inclusion hubs in libraries/community centres
			ESOL, numeracy and digital capability training
			Residents gaining accredited qualifications
	Pathways to employment and careers		Industry placements building future workforce
			Training hours in high-growth sectors
	Priority group participation		Outreach to under-represented groups
Environment and Climate Change	Active & Sustainable Travel	Active & Sustainable Travel	Car miles saved
			Low/no-emission miles driven
	Biodiversity & Natural Environment	Biodiversity & Natural Environment	Conservation volunteering hours
			Habitat creation and biodiversity improvements
	Environmental Protection & Climate Action	Improved natural environment	Biodiversity improvements and habitat creation
		Reduced carbon emissions and Net Zero	CO ₂ e savings from decarbonisation
			Commitment to Net Zero
			Green transport miles (miles/low-emission miles)
			Low carbon training hours
		Reduced Waste & Increased Recycling	Hard-to-recycle waste diverted
			Plastic recycling / single-use plastics eliminated
			Waste diverted from landfill

TC SV Theme	Sub-theme	Outcome	Output / Metrics
		Reduced resource use	Reducing water consumption
	Public Realm & Built Environment	Public Realm & Built Environment	Environmental volunteering (litter picks, conservation)
	Innovation & Future Economy	Innovation & Future Economy	Innovation pilots (low-carbon construction, circular economy) Smart building site pilots (sensors, monitoring)
	Housing Quality, Sustainability & Prevention	Housing Quality, Sustainability & Prevention	Pilot retrofit apprenticeships

5 Financial case

5.1 Introduction

A detailed Development Appraisal has been produced for the preferred option utilising (industry standard) ProVal modelling. All of the assumptions utilised in the appraisal have been discussed and agreed directly with the Director of Finance and Cabinet Member for Housing & Finance. This includes:

- PWLB borrowing at 4.65%, over 50 years (with NPV discount to match)
- Annual management charge of £600 per unit, per annum
- Annual maintenance charge of £600 per unit, per annum
- Void & Bad Debt allowance of 2.5% (equivalent to 9 days void per year)
- Tapered major repairs sinking fund (0.1% of Build Cost in Year 6, rising to 0.5% per annum by Year 10).
- Service charge (to cover communal maintenance, and any care/support costs)
- Social rents at 110% of 1999 values, as endorsed by Vickery Holman.

£37.700m of subsidy is required to deliver the project, including an assumed £18.033m from Homes England.

Utilising the finance model detailed in the Assumptions on page 10, the rental income is forecast to equal or slightly exceed the interest charge in the first full year. Over the 50-year period, as inflation-based rent increases take effect, it is anticipated that the surpluses will grow and in part will be used to repay the loan principal incrementally.

The rents for the Day Care Centre have been set at £20.00ft² as advised by Vickery Holman; whilst this is a significant increase compared to the current cost of Hollacombe; however, the figure is still below current rental demands for health developers in this field which sit around £22-25ft². The existing site is also at end of life stage, and so it would not be reasonable to charge the full commercial rate to the hosting service for this site anyway. However, moving to a new site will create a revenue pressure that the Council will have to absorb. An exercise will be undertaken in due course to plot the 'sweet spot' in respect of reducing rent liability versus increasing subsidy to support the day care centre.

5.2 Working costs for next project stage

Below is a summary of the costs required to complete the scheme a full breakdown is included in Appendix A.

Description	Value	Comments
Building Works	37,246,367	Placed with WDCL (Framework fee within construction)
PCSA/Inflation/Design Fees/ Risk	£7,264,506	Including all contingencies
Client Change through PCSA	£137,756	
Historic Sunk Costs	£5,492,142	Design, Demolition, Acquisition, Legals
SWW Diversion Allowance	£1,673,954	
Fees Internal/External	£2,460,787	
Total	£54,000,000	

Table 1 - Working cost for business case development.

5.3 Funding

The tables below set out the proposed funding strategy for the scheme:

Funding Stream (A):	Amount allocated:	Cost centre:	Currently allocated to:	Reallocate to:
ASC Capital	£3,777,922	YQB08	Crossways	N/A
ASC Revenue	£240,687	YQB08	Crossways	N/A
BLRF	£950,000	YQB08	Crossways	N/A

Funding Stream (A):	Amount allocated:	Cost centre:	Currently allocated to:	Reallocate to:
DFG	£2,252,619	YQB08	Crossways	N/A
DFG Future Allocations	£1,134,000	YQB08	Crossways	N/A
Future High Streets	£4,626,109	YQB08	Crossways	N/A
Homes England AHP	£18,032,924	<i>Yet to be secured</i>	N/A	N/A
Housing RHP	£200,044	YQB08	Crossways	N/A
HSG Advances	£1,100,000	YQB08	Crossways	N/A
S106 (AH) OSC	£1,525,909	YQB08	Crossways	N/A
TC Capital Receipts*	£3,859,787	YQB08	Crossways	N/A
Sub-total	£37,700,000			

Table 5 – Crossways existing allocated internal subsidy

*this includes a £3,847,235 of the Preston Down Road sales receipt (which is ringfenced specifically for affordable housing), and £12,552 of historic capital receipts.

The proposed scheme requires significant capital borrowing. Residential and health uses have been modelled on an interest only basis (with the capital sum being repaid through cashflow surpluses at the term end). The scheme requires a loan of £16.300m.

However, with considerable subsidy from Torbay Council, along with a grant bid to Homes England, ensures that the net revenue once the asset is stabilised at exceeds the annual loan repayment. The scheme provides a (small) cashflow surpluses from Year 1, ensuring the Council's revenue position is not exposed to further risk because of these borrowing activities.

5.4 Ongoing costs / (Recurring commitment)

All occupiers and tenants will contribute to the management costs of the asset, either through their rent (in respect of the residential units), or a service charge on top of core rent in respect of the DCC. Where tenant/occupier voids occur, the landlord will meet the void costs of turnover. An initial projection of the management costs are detailed within the PROVAL model in Appendix A.

5.5 Tax considerations

To remain within the Zero Rated VAT criteria the cafe will need to be inward facing. Any external users will need to be 'family and friends' of residents or an alternative membership scheme may be explored. Comments have been requested from TC's VAT advisor but not yet received; Strategy reviewed and endorsed by WDM Vat Specialist.

5.6 Financial summary

Approved Budget (£)	Expenditure to date	Committed	Forecast to complete	Total (including contingency)
As per previous approved business case	£6,188,727	£7,467,129	£46,532,871	£54,000,000

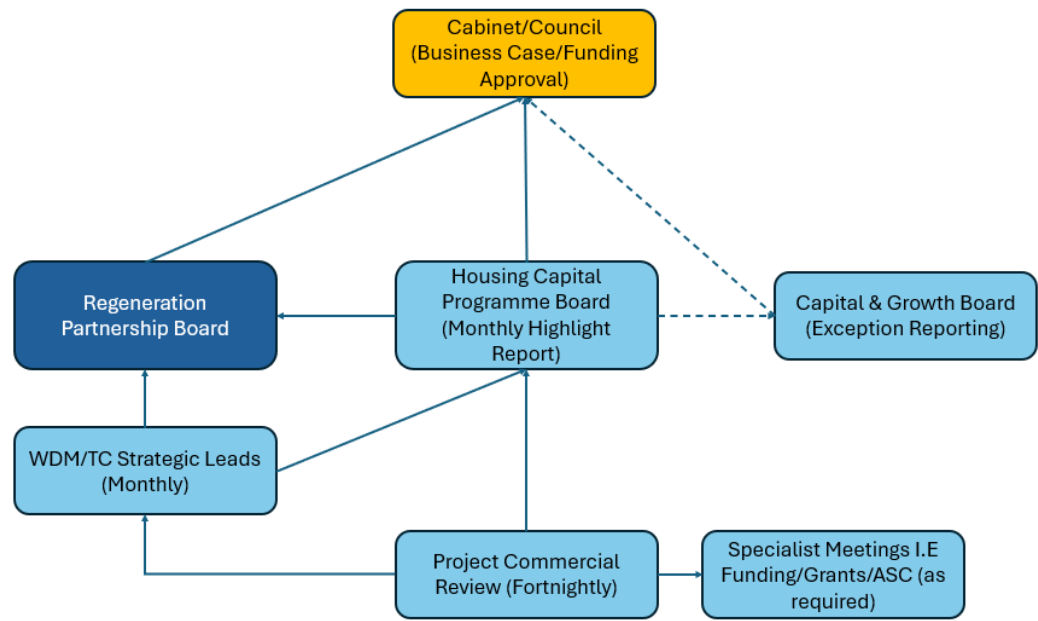
Table 2 – Overall project Budget

6 Management case

6.1 Governance arrangement

6.1.1 Governance Structure

The below identifies the governance structure for this arrangement:



The CDM and PD roles are appointed by the appropriate part in Torbay Council and Willmott Dixon Construction

WDM will project manage the schemes up until contract award. From there, the onsite management will be undertaken by Coreus, as NEC Supervisors.

6.1.2 Project Monitoring & Reporting

Project monitoring will be facilitated by the generation of monthly Highlight reports to reviewed by the Head of Strategic Housing Delivery and presented to the Housing Capital Programme Board (chaired by the Director of Regeneration). Issues requiring escalation will in the first instance be presented to Capital & Growth Board. As this project will still also continue to be reviewed by the Regeneration Partnership Board, ultimately issues can be escalated here to be discussed at Strategic Level, if required. This is outlined below:

6.1.3 Approvals and exception reporting

Where a requirement for additional/varied funding is identified, this will be brought to the attention of the SRO through monthly meetings and referred immediately to the Chief Finance officer through C&GB. In the unlikely event that an uplift is required to the overall budget, this will need to be referred to Cabinet and Council for consideration.

Subject to approval of this business case, and the ensuing Cabinet/Council decision, authority to spend up to the amount identified within section 5.2 will be provided to the SRO.

6.2 Key milestones

Below are the indicative key milestones for the project. A full estimated project plan / schedule has been provided in Appendix C.

Item	Negotiated Procurement
Feasibility	November 2024 (Complete)
Instruct WDM under PDA	October 2024 (Complete)

Item	Negotiated Procurement
RIBA 2 Concept Design	February 2025 (Complete)
OBC	December 2025 (Complete)
Procure Preferred Contractor	January 2026 (Complete)
RIBA 3/Planning Application Submission	July 2025 (Complete)
Planning Application Determination	December 2025 (Complete)
Completion of s106	July 2026
FBC	July 2026
Homes England grant bid process	July-September 2026
Start on Site (enabling works)	Sept 2026
Start on Site SWW Enabling Works	Oct 2026
Completion of SWW and Enabling	Feb 2027
Start on Site (main contract)	March 2027
Practical Completion	Jan 2029
Completion of Defects	Jan 2030

Table 6 - Key Milestones

6.3 Benefits delivery

Benefits for this scheme will be measured via the below key performance indicators:

1. Delivery of Extra Care residential units (Nr)
2. Delivery of new Day Care Centre space (Social Care)
3. The Adult Social Care Commissioning Report Authored by Adam Russell in April 2025 identified savings of around £22,462 per expected cohort resident which includes an optimism bias of 25%, based on the below areas:
 - a. A short-term diversion of eligible people from a higher cost care home trajectory to a lower cost extra-care supported living trajectory over the first year of the new scheme and then as vacancies arise.
 - b. A longer-term process of ceasing the commissioning of lower capability beds as ongoing mortality-related attrition allows and by supporting Local Authority commissioners to deliver a permanent overall reduction of these types of beds within the Torbay adult social care market.
 - c. At the same time, extra care housing also facilitates a range of improved health and care outcomes for the people using the new model of care and efficiencies across the system. This includes fewer hospital admissions, less medication and fewer GP visits

6.4 Risk management

Risks will be reviewed and managed using a standard risk matrix, outlined in **Error! Reference source not found..**

6.5 Resource requirements

The below internal resources will be required to deliver the scheme:

Name	Title	Responsible for	Time requirement
Sam Irving	Head of Strategic Housing & Delivery	SRO	Weekly catch-up meetings, Strategic oversight along with monthly reporting. Business case development and securing necessary financing
Neil Edwards	Development Consultant	Technical consultant - delivery	Expected 0.5 days per week – day to day Development Management function

Name	Title	Responsible for	Time requirement
Sammi Hunt	Development Manager	Development Manager functions	1-1.5 days per week. Financial management, reporting, technical AH. Grant conditions' compliance.
Paul Munro	Consultant Project Manager	Project Oversight	0.5 days per week. Project oversight in accordance with agreed RACI matrix
David Carter	Director of Regeneration	Strategic escalation and relationships	0.5 days per month.
Adam Russell	Head of Commissioning - ASC	Client function (ASC)	0.5 days per week
Anita Merritt	Housing Manager	Client function (housing)	0.5 days per week
Alex Rehaag	Affordable Housing Manager	Strategic housing matters	0.5 days per month (average)
Emma Falconer	Senior Engagement & Comms Officer	Project/Partnership Comms	0.5-1 day per month

Table 7 - Resource

6.6 Communications & Stakeholder engagement

6.6.1 Communications plan

A communications and stakeholder group has been formed consisting of comms officers and directors/SROs from both parties. This group will establish a strategy and implement accordingly.

6.6.2 Stakeholder engagement

Name	Title	Responsible for	Time requirement
Adult Social Care	Various	ECH/Day Care centre delivery	Project Board Minutes, client instructions
Political party members	Political oversight	delivery alignment with political policy	Monthly members briefings and CGB highlight reports

Table 3 – Key Stakeholders

6.7 Equality Impact Assessment

The Council has a duty under the Equality Act 2010 to have 'due regard' to advancing equality between those who share a relevant protected characteristic and those who do not. The Act also seeks to eliminate discrimination, harassment and victimisation. An Equality Impact Assessment (EIA) is provided at **Error! Reference source not found.**Appendix A.

Appendix A. Options cost summary (excluding balancing contingency)

		Cost	Area	
Ref	Description	£	m2	ft2
Stage 3 Cost Plan (Building Works)		28,495,265		
1.1	Main Contractor Preliminaries	5,266,029		
1.2	Main Contractor OH&P	2,976,988		
1.3	Main Contractor Provisional Sums	550,000		
1.4	Design Development risk (Omit)	710,763.77	0	
1.5	Construction Risk (Omit)	712,381.61	0	
Sub-Total		37,288,282	8,762 m²	94,313 ft²
2.1	Tender Inflation	992,572	0 m²	0 ft²
2.2	Construction Inflation	964,546		
2.3	PCSA Fee	1,283,798		
2.4	Stage 5 Design Fees	409,718		
2.5	Add Design Risk Reserve (Add)	710,764		
2.6	Add Construction Risk Reserve (Add)	712,382		
2.7	Design Development	571,900		
2.8	Inflation due to geopolitical tension	1,020,000		
Updated Estimated Current Day Cost (Excluding VE / Client Change)		43,953,962	8,762 m²	94,313 ft²
3.1	Proposed Value Engineering	0	0 m²	0 ft²
3.2	Client Change	276,000	0 m²	0 ft²
3.3	Other	-		
Sub-Total (Including VE / Client Change)		44,229,962	8,762 m²	94,313 ft²
Client Incurred Costs				
4.1	Historic Project Costs (Sunk Costs)	549,444		
4.2	SWW Diversion & Service Upgrade Works	1,500,000		
4.3	Demolition of existing building	1,075,071		
4.4	WDM Fee (3.5% Of Construction Costs)	1,305,090		
4.5	WDM PM Fee (1.25% Construction Cost)	466,104		
4.6	Historic professional services	630,336		
4.7	Client DM Fee (Residential)	273,000		
4.8	Client DM Fee (Commercial / Day Care)	76,884		
4.9	Legal Risk	299,836		
5	Right to light risk	149,390		
5.1	Party wall / CPO	181,576		
5.2	Land Purchase Costs	2,606,489		
5.3	Coreus PCSA	125,714		
5.4	Coreus Construction Fee	159,995		
5.5	Coreus NEC Supervisor Fee	54,000		
Updated Estimated Project Cost		53,682,890	8,762 m²	188,627 ft²

Appendix B. Project Risks

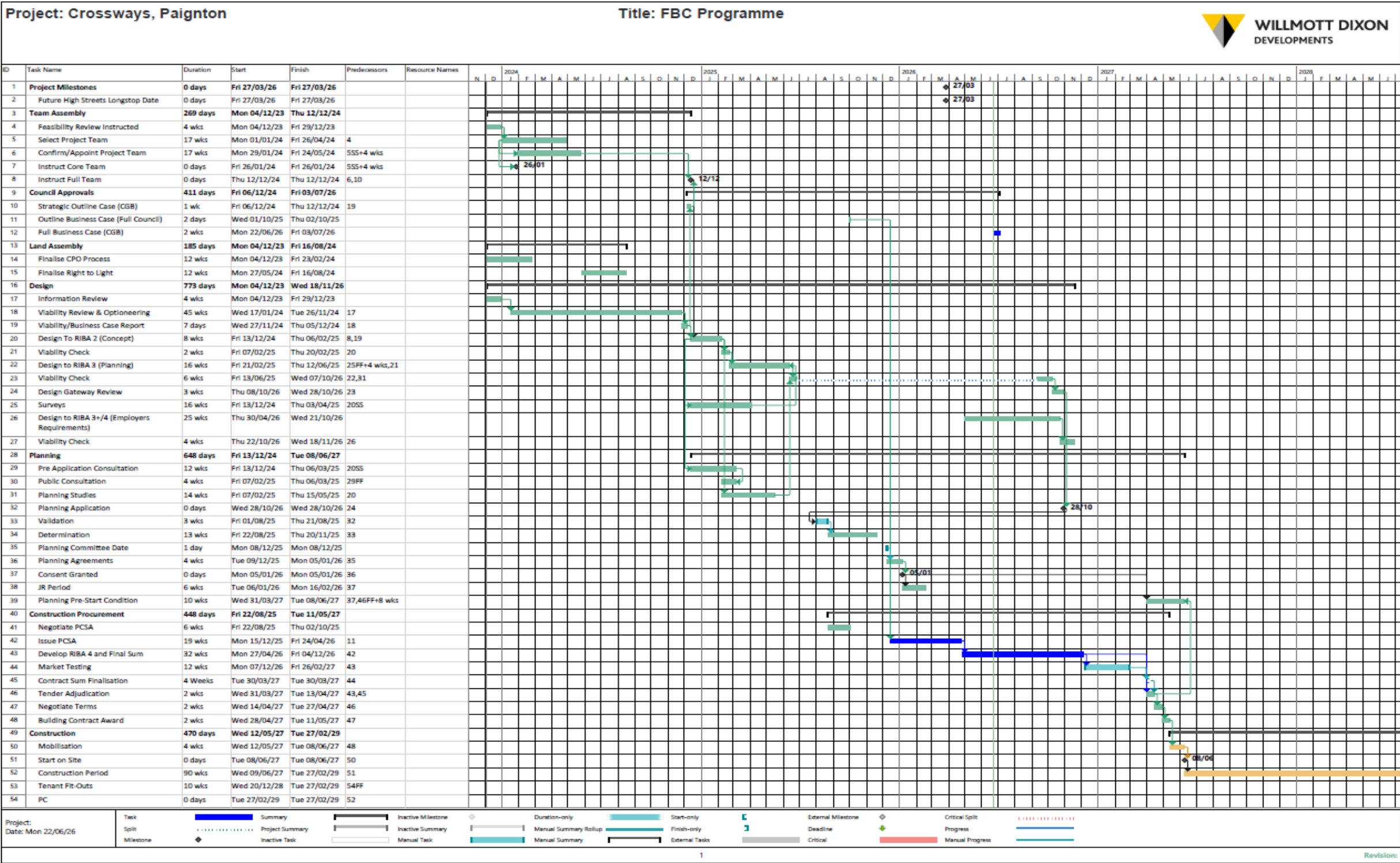
Risks will be reviewed and managed using a standard risk matrix. The initial risks identified and their mitigations at this stage have been provided in **Error! Reference source not found..**

We have been working with the wider team to develop the key risks for the scheme. We have taken the approach of utilising a list of succinct risks and opportunities to ensure the relevant attention can be paid to close out risk or realise the opportunity.

Risk No.	Risk Description	Prob	Impact	Risk Score	Date Identified	Owner	Current Status/ Mitigation/ Contingency	Risk Budget	Date Last Updated	Residual Prob	Residual Impact	Residual Risk Score
Rsk001	52 Torquay Road, Access impedes the vehicular access.	4	2	8	01/05/2026	CW	WDM met with Squires and WDC on site. Revised solution now achieved. Squires negotiating change with owner.	£5,000	23/06/2026	2	2	4
Rsk002	Hyde Road closing up footpath.	4	2	8	01/05/2026	WDM	Working with SWISCo to close up.	£2,000	23/06/2026	2	2	4
Rsk003	BSA HRB Height. Scheme 17.85m.	2	5	10	01/01/2025	WDM	Scheme designed to stay beneath the threshold. On going checks to ensure compliance.	£ -	23/06/2026	1	1	1
Rsk004	SWW Diversion.	3	4	12	01/01/2025	WDM	Working with SWW to agree build over agreement.	£1,500,000	23/06/2026	2	3	6
Rsk005	Adhering to sustainability standards.	2	2	4	08/12/2025	WDM	Scheme designed to consent.	£ -	23/06/2026	1	1	1
Rsk007	Rights of Light Claims	3	3	9	01/01/2025	WDM	ROL impacts limited. Appropriated land to ensure injunction mitigated and cost minimised.	£145,000	23/06/2026	1	1	1
Rsk008	Construction costs	3	4	12	01/05/2026	WDM	PCSA in place and contractor working to provide full cost after Not to Exceed figure established.	£500,000	23/06/2026	2	3	6
Rsk009	Construction Inflation	3	4	12	01/05/2026	WDM	Abnormal global events causing potential for inflation.	£ 1,000,000	23/06/2026	2	2	4
Rsk010	Planning Conditions	2	2	4	23/06/2026	WDM	Closing out planning conditions in a timely manner to allow SoS.	£ -	23/06/2026	1	1	1
Rsk011	Secured Grant	2	2	4	23/06/2026	TC	The scheme is in a fortunate position of having secured multiple grants, a key risk will be securing extensions to this funding, several of which have already lapsed		23/06/2026	1	1	1
Rsk012	Unsecured Grant	2	2	4	23/06/2026	TC	All of the appraisals assume AHP grant from Homes England to bolster the affordable homes delivery. A bid will need to be submitted by the SO for this, which cannot be confirmed until consideration by Homes England.		23/06/2026	1	1	1
Rsk013	Funding Rates	2	2	4	23/06/2026	TC	Funding for the borrowing of the scheme is assumed at 4.65%. Need to work to secure this rate.		23/06/2026	1	1	1
Rsk014	Car parking	2	2	4	23/06/2026	WDM	Planning secured on derogated parking standards. Ensure operation as planning consent.		23/06/2026	1	1	1
Rsk015	Day Care Centre Drop Off	2	2	4	23/06/2026	WDM	Working with NHS to ensure full transport strategy in place to ensure smooth transition.		23/06/2026	1	1	1
Rsk016	Plant Room design identified as not deliverable.	2	4	8	01/05/2026	TC	Designers worked to mitigate issue with a new route within the planning envelope.		23/06/2026	1	1	1
Rsk017	Party Wall Agreements	2	2	4	01/01/2025	TC	MOUs in place for all parties. PWA to be drafted once design complete.		23/06/2026	1	2	2
Rsk018	Stopping up of the car park.	2	2	4	23/06/2026	TC	Ensure notices and internal teams are on board with closing up the car park.		23/06/2026	2	2	4
Rsk019	Utilities - Electric	2	3	6	23/06/2026	TC	Utilities quotes in place and ready to be placed.		23/06/2026	1	1	1

Risk No.	Risk Description	Prob	Impact	Risk Score	Date Identified	Owner	Current Status/ Mitigation/ Contingency	Risk Budget	Date Last Updated	Residual Prob	Residual Impact	Residual Risk Score
Rsk020	Utilities - Water Connection	2	3	6	23/06/2026	TC	Utilities quotes in place and ready to be placed.		23/06/2026	1	1	1
Rsk021	Utilities - Foul Connection	2	3	6	23/06/2026	TC	Utilities quotes in place and ready to be placed albeit linked to diversion.		23/06/2026	1	1	1
Rsk022	Utilities - Storm Connection	3	3	9	23/06/2026	TC	Linked to the diversion. May need to review disposal rate with LLFA.		23/06/2026	2	2	4
Rsk023	Hyde Road Garden redesign due to utilities within footpath.	2	2	4	01/05/2026	WDC	Redesigned area to mitigate utilises. S73 notice required.		23/06/2026	2	1	2

Appendix C. FBC Programme



Appendix D. Equalities Impact Assessment

Protected characteristics under the Equality Act and groups with increased vulnerability	Data and insight	Equality considerations (including any adverse impacts)	Mitigation activities	Responsible department and timeframe for implementing mitigation activities
Age	18 per cent of Torbay residents are under 18 years old. 55 per cent of Torbay residents are aged between 18 to 64 years old. There are 139,479 people in Torbay (ONS Mid-Year Estimate 2022), and 1 in 4 are aged 65 or over (36,612 people, or 27%) which is higher compared to across England (where the 65s and over make up 18%). By 2043, it is estimated that over one in three (34%) of Torbay’s population will be aged 65 years and over (52,033), compared to 24% across England.	This purpose-built accommodation will reduce the need to go into a residential care home when residents’ care needs increase. Extra care housing comprises of self-contained homes with design features and support services to enable independent living. Communal facilities like a shared lounge will provide opportunities for social interaction and help combat social isolation, a long-standing challenge for aging populations. This housing is limited to those aged 55+ to provide vital accommodation in an area where this is a higher-than-average older population. The Scheme complements the aims of Adult Social Care to support people to live independently and with dignity where possible.	Consideration during the design process is required to creating a space that meets service user needs, is fully accessible and is a welcoming and inclusive environment. The importance of non-institutional design has been emphasised throughout the design process, avoiding clinical aesthetics, promoting a sense of dignity and home.	WDM - Ongoing
Carers	At the time of the 2021 census there were 14,900 unpaid carers in Torbay. 5,185 of these provided 50 hours or more of care. 4.8% of over 5’s within Torbay were identified as carers in the 2021 survey.	The Extra Care Scheme may provide relief and relive some carers of their caring responsibilities, supporting their wellbeing.	Not applicable	WDM – Housing Delivery Team
Disability	In the 2021 Census, 23.8% of Torbay residents answered that their day-to-day activities were limited a little or a lot by a physical or mental health condition or illness. The Torbay Joint Strategic Needs Assessment highlights that two-thirds of adults aged over 65 are expected to be living with multiple health conditions (multi-morbidity) by 2035. Seventeen percent would be living with four or more diseases, double the number in 2015. One-third of these people would have a mental illness like dementia or depression	Extra Care Housing supports a range of residents. Some may have a disability, and or physical/ mental health needs. The residence supports people to live independently in extra care housing but with additional on-site support. The level of support available can be tailored to meet the needs of the resident, meaning that the model is more flexible than domiciliary care. The Extra Care scheme is naturally designed for people with physical disability and mental health needs. The design of the building will be accessible and have level access and lift provisions. This will sit alongside thoughtful design which will promote wellbeing and amenity spaces suitable for mobility equipment. Additionally, an inclusive design has been considered for neurodivergent residents, with consideration given to colour palates and other interior qualities.	Consideration during the design process is required to creating a space that meets service user needs, is fully accessible and is a welcoming and inclusive environment. The scheme complies with the M4 (2) and M4(3) optional standards, which outlines space requirements and accessibility items for dwellings. These standards ensure the provisions provided are suitable for users with wheelchairs and reduced mobility. The project team accompanied the architect PRP to view existing extra care facilities with Barnet Council. Viewing these operational facilities, it assisted in further understanding the complex needs of the end user and what spaces work for them in practice. Particular focus on dementia friendly design, using colour coded floors and personalised objects to assist in navigation of the building.	WDM - Ongoing
Gender reassignment	In the 2021 Census, 0.4% of Torbay’s community answered that their gender identity was not the same as their sex registered at birth. This proportion is similar to the Southwest and is lower than England.	No adverse impacts are anticipated. Staff will receive training to ensure that they treat all residents and colleagues with respect and dignity.	Not applicable	WDM – Ongoing
Marriage and civil partnership	Of those Torbay residents aged 16 and over at the time of 2021 Census, 44.2% of people were married or in a registered civil partnership.	There will be a range of mix of apartment sizes which will cater for single and multiple occupancy homes with varying living arrangements.	Not applicable	WDM – Housing Delivery Team
Pregnancy and maternity	Over the period 2010 to 2021, the rate of live births (as a proportion of females aged 15 to 44) has been slightly but significantly higher in Torbay (average of 63.7 per 1,000) than England (60.2) and the South West (58.4). There has been a	No adverse impacts are expected.	Not applicable	Not applicable

	notable fall in the numbers of live births since the middle of the last decade across all geographical areas.			
Race	In the 2021 Census, 96.1% of Torbay residents described their ethnicity as white. This is a higher proportion than the South West and England. Black, Asian and minority ethnic individuals are more likely to live in areas of Torbay classified as being amongst the 20% most deprived areas in England.	No adverse impacts are anticipated. Staff will receive training to ensure that they treat all residents and colleagues with respect and dignity.	Not applicable	Housing Delivery Team
Religion and belief	64.8% of Torbay residents who stated that they have a religion in the 2021 census.	No adverse impacts are anticipated. Staff will receive training to ensure that they treat all residents and colleagues with respect and dignity.	Not applicable	Housing Delivery Team
Sex	51.3% of Torbay’s population are female and 48.7% are male	No adverse impacts are anticipated. Staff will receive training to ensure that they treat all residents and colleagues with respect and dignity.	Not applicable	Housing Delivery Team
Sexual orientation	In the 2021 Census, 3.4% of those in Torbay aged over 16 identified their sexuality as either Lesbian, Gay, Bisexual or, used another term to describe their sexual orientation.	No adverse impacts are anticipated. Staff will receive training to ensure that they treat all residents and colleagues with respect and dignity. The British Attitude Survey highlights that 67% of people think a relationship between two people of the same sex is never wrong, compared to 17% in 1983. However, the reports suggest that the figure decreases for those in older population groups. The above staff training and understanding of discrimination will assist management.	Not applicable	Housing Delivery Team
Armed Forces Community	In 2021, 3.8% of residents in England reported that they had previously served in the UK armed forces. In Torbay, 5.9 per cent of the population have previously served in the UK armed forces.	No adverse impacts are anticipated. Staff will receive training to ensure that they treat all residents and colleagues with respect and dignity.	The design team includes ex-armed forces and reservists; their input has been part of the design process.	Housing Delivery Team
Additional considerations				
Socio-economic impacts (Including impacts on child poverty and deprivation)	Torbay’s economy is ranked among the weakest in England. Average wages continue to be significantly below the regional and national average with less of the population in full-time employment than England.	The Scheme provides affordable housing across various tenures along with Adult Social Care provision.	The extra care scheme will be creating management jobs, and the Holcombe facility will retain the staff numbers.	Housing Delivery Team
Public Health impacts (Including impacts on the general health of the population of Torbay)		Pollution	The scheme has reduced parking provisions and thus reducing pollution in the area and promoting increased amenity space in the scheme. Nearby bus stop also promotes sustainable travel, supporting access to the community.	WD - Ongoing
Human Rights impacts		No human rights impacts are anticipated. Residents will have an ASC assessment in line with best practice where required.	Not applicable	Not applicable
Child Friendly	Torbay Council is a Child Friendly Council, and all staff and Councillors are Corporate Parents and have a responsibility towards cared for and care experienced children and young people.	No adverse impacts are anticipated. This scheme is specifically designed for those aged 55 and over to support ASC service delivery.	Not applicable	Housing Delivery Team
Protected characteristics under the Equality Act and groups with increased vulnerability	Data and insight	Equality considerations (including any adverse impacts)	Mitigation activities	Responsible department and timeframe for implementing mitigation activities
Age	18 per cent of Torbay residents are under 18 years old. 55 per cent of Torbay residents are aged between 18 to 64 years old. 27 per cent of Torbay residents are aged 65 and older.	Accessibility and visual impacts.	Extra Care scheme naturally designed for 55+ demographics will have suitable level access and lift provisions along with amenity spaces suitable for mobility equipment.	WDM - Ongoing
Carers	At the time of the 2021 census there were 14,900 unpaid carers in Torbay. 5,185 of these provided 50 hours or more of care.	Cost of living and affordability of housing.	Equitable housing and potential to provide relief and mitigation to carers responsibilities.	WDM – Housing Delivery Team
Disability	In the 2021 Census, 23.8% of Torbay residents answered that their day-to-day activities were limited a little or a lot by a physical or mental health condition or illness.	Accessibility and visual impacts.	Extra Care scheme naturally designed for demographics with physical and mental needs, will have suitable level access and lift	WDM - Ongoing

			provisions along with amenity spaces suitable for mobility equipment.	
Gender reassignment	In the 2021 Census, 0.4% of Torbay’s community answered that their gender identity was not the same as their sex registered at birth. This is similar to the Southwest and is lower than England.	Accessibility	Spaces will be designed to be sympathetic with a multitude of demographics and needs.	WDM – Ongoing
Marriage and civil partnership	Of those Torbay residents aged 16 and over at the time of 2021 Census, 44.2% of people were married or in a registered civil partnership.	Access to suitable housing.	Mix of apartment sizes to cater for single and multiple occupancy.	WDM – Housing Delivery Team
Pregnancy and maternity	Over the period 2010 to 2021, the rate of live births (as a proportion of females aged 15 to 44) has been slightly but significantly higher in Torbay (average of 63.7 per 1,000) than England (60.2) and the South West (58.4). There has been a notable fall in the numbers of live births since the middle of the last decade across all geographical areas.			
Race	In the 2021 Census, 96.1% of Torbay residents described their ethnicity as white. This is a higher proportion than the South West and England. Black, Asian and minority ethnic individuals are more likely to live in areas of Torbay classified as being amongst the 20% most deprived areas in England.	Accessibility	Agnostic letting strategy.	Housing Delivery Team
Religion and belief	64.8% of Torbay residents who stated that they have a religion in the 2021 census.	Accessibility	Agnostic letting strategy.	Housing Delivery Team
Sex	51.3% of Torbay’s population are female and 48.7% are male	Accessibility	Agnostic letting strategy.	Housing Delivery Team
Sexual orientation	In the 2021 Census, 3.4% of those in Torbay aged over 16 identified their sexuality as either Lesbian, Gay, Bisexual or, used another term to describe their sexual orientation.	Accessibility	Agnostic letting strategy.	Housing Delivery Team
Armed Forces Community	In 2021, 3.8% of residents in England reported that they had previously served in the UK armed forces. In Torbay, 5.9 per cent of the population have previously served in the UK armed forces.	Accessibility	Agnostic letting strategy.	Housing Delivery Team
Additional considerations				
Socio-economic impacts (Including impacts on child poverty and deprivation)		Access to services	Scheme provides affordable housing across various tenures along with Adult Social Care provision.	Housing Delivery Team
Public Health impacts (Including impacts on the general health of the population of Torbay)		Pollution	Scheme reduced parking requirements and thus reducing pollution in the area. Will be delivered to high sustainability requirements.	WD - Ongoing
Human Rights impacts				
Child Friendly	Torbay Council is a Child Friendly Council, and all staff and Councillors are Corporate Parents and have a responsibility towards cared for and care experienced children and young people.	Access to services	Scheme provides affordable housing across various tenures along with Adult Social Care provision.	Housing Delivery Team

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Meeting: Cabinet

Date: 21 July 2026

Wards affected: All

Report Title: Torbay Local Plan Regulation 19 Publication

When does the decision need to be implemented?

Publication of the Local Plan for formal “Regulation 19 Publication” consultation in August 2026.

Cabinet Member Contact Details: Cllr Chris Lewis, Cabinet Member for Place Development and Economic Growth, chirs.lewis@torbay.gov.uk

Director Contact Details: Alan Denby, Director of Pride in Place, alan.denby@torbay.gov.uk

1. Purpose of Report

- 1.1. This report seeks Council approval to publish the Regulation 19 “publication version” of the Torbay Local Plan 2025-45 for consultation. The Local Plan must be submitted to the Secretary of State for Examination, by the end of December 2026.
- 1.2. The draft Local Plan was published for consultation in November 2025, with two earlier consultations on growth and housing levels taking place in January and October 2022.
- 1.3. The contents of the proposed Regulation 19 Publication Plan (referred to as the Reg 19 Plan below) have been reviewed by the Local Plan Working Party and the Local Plan as currently worded reflects their recommendations.
- 1.4. When adopted the Local Plan (along with made Neighbourhood Plans) form the legal starting point for determining planning applications and set out a positive vision for the area and a framework for meeting housing needs and addressing other economic, social and environmental priorities. The Local Plan must be prepared according to legislation and the National Planning Policy Framework (NPPF). In any event the Levelling Up and Regeneration Act gives primacy to National Policy in decision making. The most challenging issue for local plans is often their ability (or inability) to meet the Government’s Local Housing Need figures. This is clearly the case for Torbay, with the Government writing to the Leader on 22nd January 2026 and again on 11th June 2026, due to concerns raised as the Regulation 18 Consultation contained a proposal for only 42% of the Government’s Standard Method Local Housing Need Figure. In the most recent letter, the minister made an intervention to direct submission of evidence documents to justify the position.

2. Reason for Proposal and its benefits

- 2.1. The proposals in this report help deliver our vision of a healthy, happy, and prosperous Torbay by seeking to create a strategic framework for managing land use in Torbay in the public interest. It is a Plan for growth within environmental limits and strongly promotes regeneration and modernisation of the built-up area. It seeks to minimise damage to the natural environment and to provide resilience to the effects of Climate Change whilst reducing carbon emissions.
- 2.2. The Plan expressly seeks to deliver the spatial aspects of the Community and Corporate Plan 2023-43, The Torbay Story, The Housing Strategy and Accommodation Repurposing Programme, Town Centre regeneration programmes, and the Devon and Torbay Local Transport Plan.
- 2.3. Local Plans frequently hinge of the headline rate of housing growth, as a key part of the tests of soundness. The Regulation 18 Local Plan consultation received a letter from Housing Minister Matthew Pennycook to this effect. The Torbay Local Plan proposes a minimum of 8,000 dwellings between 2025-2045 equal to 400 a year, with a stepped trajectory. This is significantly below the Government's Standard Method Local Housing Need (LHN) of 970 dwellings a year. This will be a significant challenge for the Plan's prospects of being found sound. A subsequent letter highlighting this concern was received from Housing Minister Matthew Pennycook on 11th June 2025. However, the Local Plan Working Party has assessed options for boosting housing numbers at length and the proposed Regulation 19 Local Plan represents the Plan which is considered to balance the need to take a "no-stone left unturned" approach to boosting housing numbers against Torbay's substantial environmental constraints, managing climate change, and challenging market conditions/viability.
- 2.4. Local Plans need to meet several legal requirements, including carrying out Sustainability Appraisal and Habitats Regulations Assessment. These have influenced the proposals in the Local Plan.
- 2.5. There is no longer a legal requirement to demonstrate a Duty to Cooperate with neighbours, but showing effective joint working with neighbours remains a "test of soundness". Torbay has notified its neighbours that it cannot meet its housing need. Torbay and Teignbridge officers agreed a mechanism whereby Teignbridge would allocate additional housing sites to meet Torbay's unmet need, once the scale of this was identified [dtc-003-addressing-torbay-s-unmet-need.pdf](#). However, the Teignbridge Local Plan Examination Inspectors removed this mechanism (Main Modification 102) on the basis that it should be dealt with at first review of the Teignbridge Local Plan.
- 2.6. The Local Plan needs to set out a strategy for delivering key infrastructure. In particular, it needs establish a network of green infrastructure and water management which is essential to supporting the council's regeneration programme and avoid harm to the Marine and South Hams Special Areas of Conservation. The Local Plan also seeks to safeguard land at Yalberton for waste management purposes.

- 2.7. Cabinet will be considering the proposal at its meeting on 21 July 2026 and requested to make recommendations to Council as set out in paragraph 3 below. A copy of the Cabinet's decision will be published prior to the Council meeting.

3. Recommendation(s) / Proposed Decision

That the Cabinet recommends to Council:

- 3.1 That the Torbay Local Plan: Publication Plan (attached as Appendix 2 and subject to 3.2) be approved for publication for a 6-week consultation under Regulation 19 of the Town and Country Planning (England) Regulations 2012 (as amended);
- 3.2 That the Director of Pride in Place, in consultation with the Cabinet Member for Place Development and Economic Growth, be delegated authority to make final minor editorial amendments to the Plan and publish supporting technical reports as part of the consultation.
- 3.3 That, in discussions with neighbouring authorities, the council's position is that Torbay's unmet housing need should be addressed at a sub-regional level, through the Spatial Development Strategy.

4. Appendices

Appendix 1: Letters from Minister Matthew Pennycook dated 11 June 2025 and 22 January 2026

Appendix 2: Regulation 19 Draft Torbay Local Plan (Please note that this is a draft working document).

5. Background Documents

- National Planning Policy Framework (December 2024) [National Planning Policy Framework - GOV.UK](#) and draft NPPF. Specific attention is drawn to Paragraphs 11a-b The Presumption in Favour of Sustainable Development for Plan making, and Paragraph 36 The Tests of Soundness for development plans.
- A draft replacement [National Planning Policy Framework: draft text for consultation](#) was published in December 2025. This would substantially change the English planning system by introducing National Decision-Making Policies. Policies S3-S5 come close to introducing a zonal planning system first mooted in the 202 Planning White Paper.
- The regulations governing "legacy" development plans are set out in the: [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](#)
- Replacement Regulations "The Town and Country Planning (Local Planning) (England) Regulations 2026" came into force in March 2026 which govern local plans submitted after 31 December 2026. These govern new style "30-month" local plans prepared under the Levelling Up and Regeneration Act 2023 and require a new evidence base.

Supporting Information

6. Introduction

- 6.1 The current Torbay Local Plan 2012-30 was adopted in 2015 and is out of date. The updated Local Plan has been subject to three rounds of consultation at “Regulation 18” pre-publication stage:

Growth Options (10th January- 28 February 2022)

Housing Site Options (28 October -5th December 2022)

Full Draft Local Plan (28 November 2025-20th February 2026).

- 6.2 The previous consultation documents and summaries of response received are available at [Local Plan Update \(2025 to 2045\) - Torbay Council](#). The best way to view the regulation 18 Full Draft Local Plan and responses is on the council’s consultation webpage at [Torbay Council - Consultations](#) (click on “historic documents”). A common theme from Torbay residents in all three consultations is a need to focus on regenerating town centres and the built-up area, and building-out existing site-allocations before allocating further greenfield land.
- 6.3 The feedback from the Regulation 18 Consultation has been considered by the Local Plan Working Party and a draft Regulation 19 Publication Plan prepared for consultation.

7. Options under consideration

- 7.1. It is recommended that the Regulation 19 Local Plan be published for consultation in August-September 2026, with a view to returning the Local Plan to Council in December 2026 to agree submission in December 2026. Many (Over 100) Local Authorities are planning to submit their Plans in December 2026, so the likely date for Examination is later in 2027.
- 7.2. There are substantial changes afoot with the English system of planning and local government. This includes Local Government Reorganisation, a new NPPF (see above), the prospect of Spatial Development Strategies, and a December 2026 deadline for Plan submission. This has led some authorities to abandon their Local Plans or start to prepare plans under the “new” system.
- 7.3. If the December 2026 Submission Deadline is not met, the Local Plan and its evidence base will need to be restarted under the levelling Up and Regeneration Act 2023 and accompanying 2025 Regulations. Although these are called “30-month local plans” there are questions whether the 30-month timetable is achievable. Not submitting the Plan would mean that the Presumption in Favour of Sustainable development would apply to all planning applications in Torbay for the foreseeable future, against meeting the Government’s Standard Method Local Housing Need figure of 970 dwellings a year.
- 7.4. The draft Plan seeks to ensure that once adopted it is capable of being deemed “up to date” (see footnote 8 of the 2024 NPPF). There is a possibility that the Presumption will still apply

after a Local Plan is adopted if the council is unable to demonstrate a five-year supply or achieves less than 75% of housing delivery.

- 7.5. There are good reasons why Torbay is unable to achieve the Government's Housing Needs targets, which have been considered by the Local Plan Working Party and will be set out in a Growth Topic Paper. Consulting on a Regulation 19 Plan gives Torbay the opportunity to publish the Plan that it believes to be the right approach for the area and to robustly support the Community and Corporate Plan and the Torbay Story in its land use planning framework. Once it reaches Regulation 19 Stage (and more so when submitted) the Local Plan gains some limited weight in decision making and can set out guidance for Neighbourhood Plans. It becomes the Council's "preferred approach".
- 7.6. A "test of soundness" requirement for the Local Plan is that Torbay should have engaged constructively with neighbours about how its unmet needs can be met. Rather than falling entirely into the nearest adjoining areas (Teignbridge and South Hams), officers have recommended that the issue is relevant to the wider housing market areas in South Devon and should be dealt with through the forthcoming Spatial Development Strategy (SDS).

8. Financial Opportunities and Implications

- 8.1. Local Plans are expensive. However, much of the expense has already been incurred. The Government has also provided additional funding to support the preparation of Plans for submission by December 2026.
- 8.2. Not progressing the Local Plan at this stage would require a regathering of the evidence base in the new process.

9. Legal Implications

- 9.1. See above. The Local Plan is prepared according to legal requirements set out in Planning Legislation, including the Planning and Compulsory Purchase Act 2004 and the accompanying 2012 Regulations. Subsequent changes in the Levelling Up and Regeneration Act 2023 and Planning and Infrastructure Act 2025 also affect the Local Plan.
- 9.2. The legal requirement under Section 39(2) of the 2004 Act for Local Plans to have the objective of contributing to the achievement of sustainable development, and a duty to have regard to national guidance. This gives legal weight to the Presumption in Favour of Sustainable Development at Paragraph 11(a-b) of the National Planning Policy Framework.
- 9.3. Changes to the 2004 Act introduced in the Levelling Up and Regeneration Act 2023 amend Section 38 of the Act to give primacy in decision making to national policy over the development plan.
- 9.4. Sections 21 and 27 of the Planning and Compulsory Purchase Act 2004 gives the Secretary of State powers to intervene in Plan making, and the council received a letter from Minister Matthew Pennycook on 11th June to this effect, with the direction to submit the evidence base documents.

10. Engagement and Consultation

- 10.1. Please see above. The Local Plan has been through three rounds of public consultation and engagement, and detailed assessment of consultation responses has been reported to the Local Plan Working Party. Representations submitted to the Regulation 18 Draft Local Plan have been carefully considered by officers and the Local Plan Working Party. A detailed schedule of comments and how these influenced changes to the Plan has been considered by the Working Party.
- 10.2. Council approval is sought to publish the next consultation stage of the Local Plan, which is the Regulation 19 “Publication” version. This is subject to a formal 6-week public consultation into its soundness and legal compliance. The Leader and Cabinet Member have advised that the Plan must return to full Council before submission to the Secretary of State for examination, to ensure that there is proper scrutiny of the feedback arising from the Regulation 19 (formally Regulation 20) consultation responses. The timescale to achieve this is very tight, but it does ensure that the Regulation 19 Consultation is a meaningful one.

11. Procurement Implications

- 11.1. The Local Plan is reliant on an evidence base and requires an Examination in Public and Programme Officer.

12. Protecting our naturally inspiring Bay and tackling Climate Change

- 12.1. Please see the detailed policies in the Plan.

13. Associated Risks

- 13.1 This proposal addresses the corporate risk CP49.
- 13.2 The above sections all provide further context. There is a high risk of the Local Plan not being found sound due to the issue of housing numbers. However, meeting the Government’s Local Housing Need figure would cause substantial damage to Torbay’s environment, and is not deliverable given market conditions. The proposed level of growth will require very robust justification.
- 13.3 Officers and the Local Plan Working Party are seeking to produce the best Regulation 19 version of the Plan they can given the above constraints, and to reflect the views of those who commented on the Regulation 18 Draft Local Plan.
- 13.4 A similar Presumption in Favour of Sustainable Development must be applied either to get a Local Plan adopted or as a “penalty” for not having an up-to-date local plan (or failing other tests such as five-year housing supply or the housing delivery test, or the Local Plan being trumped by a new NPPF). Planning decisions will need to rely more heavily on the National Planning Policy Framework, and there will be increased risk of planning by appeal. Local ability to shape development and support economic growth in Torbay will be reduced, but decisions still must be made in the public interest.

- 13.5 As identified above, the main risk arising if the Local Plan stalls is to the development of urban brownfield sites, including the council's own programmes which require overarching green infrastructure provision to offset flooding, water management and impact on Special Areas of Conservation. Speculative greenfield applications are more likely to be able to dedicate land to achieve this on-site.
- 13.6 Not progressing the plan at this stage would result in significant abortive work and cost. Furthermore, producing a Local Plan under the new system will take minimum of 3 years to have in place. During this time, the Council will struggle to resist speculative development on inappropriate sites. Developments that do come forward during this time, whether supported or not, also have potential to be of less quality in terms of design, with less planning gain secured for services.

14 Equality Impact Assessment

The Local Plan contains policies on housing, affordable housing, employment and will be subject to an Equalities Impact Assessment.

Protected characteristics under the Equality Act and groups with increased vulnerability	Data and insight	Equality considerations (including any adverse impacts)	Mitigation activities	Responsible department and timeframe for implementing mitigation activities
Age Page 90	18% of Torbay residents are aged under 18 years old. 55% of Torbay residents are aged between 18 to 64 years old. 27% of Torbay residents are aged 65 and older.	Constraining housing supply below the Standard method LHN is likely to reduce the availability of affordable housing, and S106 “private subsidy” available for affordable housing. A brownfield first approach is likely to lead to the creation of more apartments rather than family housing. Reduced housing supply may disproportionately impact younger households and families by limiting affordability	The Accommodation Repurposing and regeneration programmes seek to substantially boost the supply of affordable housing in sustainable town centre locations. Over the next decade, ONS projections indicate that there will be +509 households per year in Torbay, of whom 460 will be single person households, including 287 people aged 65+ living alone. An ageing population and social isolation is likely to be a big challenge for Torbay.	Regeneration and Place Delivery Pride in Place.

		Ageing population increases risks of isolation, unmet care needs, and pressure on services The Local Plan contains policies for maximising the supply of housing as far as viable and environmentally possible. The Local Plan needs to balance housing provision and other uses of land including employment, nature conservation, protected landscape and green infrastructure. Torbay has very substantial environmental constraints and infrastructure capacity limits. Balancing these competing objectives-all of which have equalities impact dimensions- is a significant challenge for the Plan.	The Plan contains policies to provide specialist accommodation, and to seek to target specialist accommodation at local people.	
Carers	- At the time of the 2021 census there were 14,900 unpaid carers in Torbay. 5,185 of these carers provided 50 hours or more of care.	Unpaid carers are more likely to require access to a network of open spaces, public transport and accessible parking.	See above The Local Plan contains policies to provide accommodation for people in need of care and support, and to prioritise such accommodation for Torbay residents.	

			Cares will benefit from the provision of adaptable dwellings and adaptable housing, and the maintenance of accessible shops, community facilities. Parking provision standards needs to provide ample space for disability vehicles.	
Care experienced	As of January 2026, there were 277 former care experienced young people aged 18-24 in Torbay.	No direct differential impact but care experienced young people may need a level of transitional accommodation with some additional support when they reach early adulthood.	The Local Plan contains policies to provide employment space, and support links between employers, South Devon College and other providers.	
Disability	In the 2021 Census, 23.9% of Torbay residents answered that their day-to-day activities were limited a little or a lot by a physical or mental health condition or illness.	The Local Plan will have a positive impact by creating accessible buildings and spaces and accessible housing.	The Local Plan provides policies on the provision of specialist housing as part of the affordable housing mix, and for a proportion of homes to be built to M4(2) and M4(3) standard. The Local Plan's overarching strategy is to focus growth in accessible locations particularly in town centres and transport corridors to reduce the need to travel by car.	

			Ensuring these positive impacts are secured through developer obligations, conditions and monitoring..	
Gender reassignment	In the 2021 Census, 0.4% of Torbay's community answered that their gender identity was not the same as their sex registered at birth.	No differential impact	The Local Plan contains policies for the creation and maintenance of safe open spaces and buildings. It provides a framework to support the improvements to create gender neutral spaces.	
Marriage and civil partnership	Of those Torbay residents aged 16 and over at the time of 2021 Census, 44.2% of people were married or in a registered civil partnership.	No differential impact	The Plan seeks to ensure access to family housing, healthcare, schools, and greenspaces.	
Pregnancy and maternity	- Between 2013 and 2024, the rate of live births (as a proportion of females aged 15 to 44) has been slightly but significantly higher in Torbay (average of 56.0 per 1,000) than the Southwest (53.4) and broadly in line with England (56.3). - For the period 2022 to 2024, rates in Torbay (44.6) have been significantly below England (50.0).	No differential impact	The Local Plan seeks to support a network of accessible open spaces, public health and healthcare facilities.	

Race Page 94	In the 2021 Census, 96.1% of Torbay residents described their ethnicity as the following: • 1.6% as Asian, Asian British or Asian Welsh • 0.3% as Black, Black British, Black Welsh, Caribbean or African • 1.5% as being of Mixed or Multiple ethnic groups • 96.1% as White • 0.4% described their ethnicity another way. • Black, Asian and minoritised ethnic communities are more likely to live in areas of Torbay classified as being amongst the 20% most deprived areas in England.	No differential impact.	The Local Plan has been amended from Reg 19 to ensure that a wider range of community spaces is available. Monitoring of access to housing, particularly affordable housing and facilities will need to ensure that no ethnicity is directly or indirectly excluded from housing. The Local Plan contains policies to create safe and accessible public spaces.	
Religion and belief	The 2021 Census showed that the residents in Torbay identify their religion and/or belief as the following; • 48.5% are Christian • 0.4% are Buddhist • 0.2% are Hindu • 0.6% are Muslim • Less than 0.1% are Sikh • 0.1% are Jewish • 0.7% have another religion • 43.2% have no religion • 6.3% did not answer	The Local Plan has received representations from faith groups and has made several additions to the plan to support the provision of places of worship and other community space.	Policy SC5 recognises the shortage of cemetery spaces in Torbay and allocates land to meet this need, including the recognition that this site should contain ceremonial space. The Plan recognises and supports that faith groups can have in providing community and tackling social isolation.	

			The Plan contains policies to protect and enhance the built and natural environment, both of which have a sacred significance for many faiths.	
Sex	• 51.3% of Torbay's population are female. • 48.7% of Torbay's population are male.	See above in relation to housing numbers -which will affect the provision of affordable housing, and the mitigations that the Plan seeks to put in place. The Local Plan contains policies to seek to reduce crime and anti-social behaviour and improve safety in town centres.	The Local Plan contains policies to create safe and accessible public spaces, and to support the monitoring of spaces through CCTV etc.	
Sexual orientation	In the 2021 Census, residents described their sexuality as follows; • 89% as Straight or Heterosexual • 1.7% as Gay or Lesbian • 1.1% as Bisexual • 0.1% as Pansexual • 0.1% described their sexuality another way • 7.4% of people didn't answer the question	No differential impact.	The Local Plan contains policies to create safe and accessible public spaces.	
Armed Forces Community	• In 2021, 3.8% of residents in England reported that they had previously served in the UK armed forces.	The Local Plan seeks to maximise the provision of affordable housing and supported housing.		

	In Torbay, 5.9% of the population have previously served in the UK armed forces.			
Additional considerations				
Socio-economic impacts (Including impacts on child poverty and deprivation)	Torbay is ranked as the 39th most deprived upper tier local authority in England in the Index of Multiple Deprivation 2025.		The Local Plan seeks to address Torbay's underlying poor economic profile by robustly supporting urban regeneration and accommodation repurposing. It contains policies to steer unsuitable developments such as HMOs and uses likely to generate anti-social behaviour away from the most deprived areas, and contains detailed policies to improve prosperity in Torbay and Community Regeneration areas in particular.	
Public Health impacts (Including impacts on the general health of the population of Torbay)	For the five-year period 2020 to 2024, data shows there is a 6-year life expectancy gap between males who live in Torbay's least and most deprived areas and, a 3-year gap for females.	The Local Plan contains policies to improve the provision of good quality affordable housing, to regenerate the town centres and Community Investment Areas. It seeks to provide public open spaces and improve access to nature.	The Local Plan seeks to provide healthcare infrastructure, with the caveat that developer contributions are insufficient to address the funding gap in the healthcare and social care system.	

Human Rights impacts		No direct impact, although Human Rights Act duties affect elements of the Local Plan.		
Child Friendly		See above comment on housing numbers.	The Local Plan seeks to provide a network of child friendly spaces and facilities including play areas, schools and other community facilities.	

15 Cumulative Council Impact

- 15.1 The Local Plan affects other areas of the Council and SWISCO, especially those relating to Place, Regeneration and Community Services.

16 Cumulative Community Impacts

- 16.1 Many people in Torbay will not have heard of the Local Plan. However, everyone who uses land in Torbay is affected by the Local Plan and individual policies and site allocations are frequently very high profile and controversial.
- 16.2 In particular, the Local Plan sets out a framework for Neighbourhood Plans, which were last “made” (i.e. adopted) in 2019. Replacement Neighbourhood Plans are currently being prepared for Brixham and Torquay. In the absence of an agreed Local Plan housing target greater weight falls on the Government’s housing need figures for an area.



Ministry of Housing, Communities & Local Government

Matthew Pennycook MP

Minister of State for Housing and Planning
2 Marsham Street
London
SW1P 4DF

Councillor David Thomas
Leader of Torbay Council
Town Hall
Castle Circus
Torquay
TQ1 3DR

22 January 2026

Dear Cllr Thomas,

As you know, this government was elected on a manifesto that included a commitment to build 1.5 million new safe and decent homes in this Parliament. All parts of the country, including Torbay, are required to play their part in delivering that objective, and decisions made locally should be about how to meet housing needs, not whether to do so at all.

In light of the above, I am concerned that the draft local plan which Torbay published in November for Regulation 18 consultation contains a minimum housing requirement of 400 dwellings per annum (dpa), a figure which represents approximately 42% of the area's current Local Housing Need (LHN) of 949 dpa.

Torbay's current local plan was adopted in 2015, meaning that many of the policies it contains may now be out of date. Torbay currently cannot demonstrate a Five-Year Housing Land Supply, and the area's most recent Housing Delivery Test Score (2023) was only 66%. It is plainly in the best interests of the communities which Torbay Council represents for an up-to-date local plan to be put in place as soon as possible. The Council has recently re-confirmed its intention to submit a plan before the current plan-making system deadline of 31 December 2026 and it is vitally important that this submitted plan contains a housing requirement that can be shown to be justified at examination.

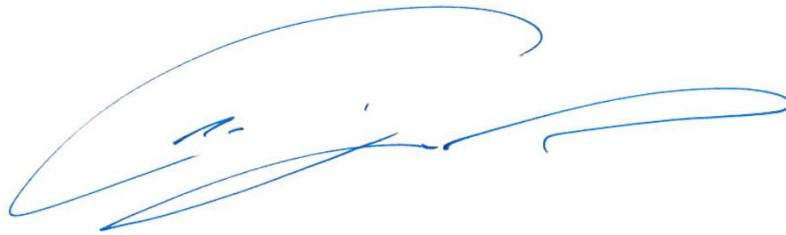
National planning practice guidance is clear on the sequence of actions that local planning authorities should take when insufficient sites or broad locations have been identified to meet development needs. Authorities are expected first to revisit their assessments, either through conducting further calls for sites or changing assumptions about the development potential of particular sites.

If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground. If following this, needs still cannot be met, then the plan-making authority will need to robustly demonstrate the reasons why as part of the plan examination. I understand that these expectations have been re-iterated to the Council in meetings with both MHCLG officials and Planning Inspectors.

To ensure that Torbay Council has left no stone unturned in its efforts to identify land that is suitable for development, I have asked the Planning Inspectorate to organise a further Advisory Visit over the coming weeks. The primary purpose of this meeting should be to examine the approach that the Council has taken to meeting its development needs, and to evaluate the extent to which the emerging housing requirement will be defensible at examination.

I expect Torbay Council to engage constructively with the Advisory Visit and will instruct my officials to monitor the outcomes of the session and highlight whether any further action is required.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Matthew Pennycook', with a large, sweeping flourish extending to the right.

MATTHEW PENNYCOOK MP
Minister of State for Housing and Planning



Ministry of Housing, Communities & Local Government

Matthew Pennycook MP
Minister of State for Housing and Planning

**Ministry of Housing, Communities & Local
Government**
2 Marsham Street
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Councillor David Thomas
Leader of Torbay Council
Town Hall
Castle Circus
Torquay
TQ1 3DR

11 June 2026

Dear Cllr Thomas,

I am writing to you regarding the emerging Torbay Local Plan 2025-2045, following on from my previous correspondence about this matter in January.

In my last letter, I requested that Torbay Council organise an urgent Advisory Visit (AV) with the Planning Inspectorate, which I was pleased to hear took place in February. The outcome of this AV, however, underlines my concerns about whether the Council is bringing forward a plan which is capable of being found sound.

For a plan to be considered sound it should be positively prepared, justified, effective, and consistent with national policy - providing a strategy which, as a minimum, seeks to meet the area's housing needs.

In November, the Council published a draft local plan for Regulation 18 consultation with a housing requirement that met just 42% of the area's Local Housing Need (LHN), leaving a shortfall of 10,980 homes over the plan period. There appears to be limited up-to-date evidence available to justify the Council's approach.

I am particularly concerned that, despite recent work to re-align your emerging plan with the 2024 version of the National Planning Policy Framework, an up-to-date Housing and Economic Land Availability Assessment (HELAA) has not yet been published. I am also aware that the Council has failed to respond to enquiries from my officials about when this document may be released. Without updated evidence on land availability, it is not possible to reach a conclusion on whether the Council has taken a sufficiently robust approach to the identification of suitable sites for development and, therefore, whether the plan stands a reasonable chance of being found sound at examination.

The Secretary of State has broad default powers of intervention under section 27 of the 2004 Planning and Compulsory Purchase Act which can be exercised where he thinks that a local planning authority are failing or omitting to do anything it is necessary for them to do in connection with the preparation, revision or adoption of a development plan document. I consider that the Council's proposal of a housing requirement which falls well below LHN in its draft plan, combined with the aforementioned lack of published evidence to support this approach, meets the legal threshold for intervention.

I have also considered the criteria laid out in the Planning Practice Guidance (PPG), which states that intervention under section 27 of the 2004 Act "*should have regard to plan progress and local development needs*".

- **Plan Progress:** Torbay's current local plan was adopted in 2015, meaning the policies it contains are likely to be out of date, and there is a pressing need for the Council to adopt an up-to-date local plan to reduce the area's vulnerability to piecemeal and speculative development. Progressing a plan which may be unsatisfactory risks failure at examination, and further delays whilst the Council begins work on a new local plan in the new plan-making system provided for in the Levelling Up and Regeneration Act 2023.
- **Development needs:** The Council's latest (2023) Housing Delivery Test score was 66%, putting the area into the presumption in favour of sustainable development. There is also an acknowledged shortage of affordable homes in Torbay, which is unlikely to be addressed in the absence of an up-to-date plan. Additionally, the draft plan published for Regulation 18 consultation by the Council does not meet local needs given the low housing requirement it contains.

Taking all of the above into account, I consider that the intervention criteria are met, and that intervention is justified.

Therefore, I am directing the Council under section 27(2)(b) of the 2004 Act to submit to me all available evidence base documents which inform your conclusion that only 42% of local housing need can be met through your emerging plan. This should include an updated HELAA (including consideration of sites proposed in the most recent Call for Sites in 2025), along with any relevant studies the Council has commissioned on matters such as constraints, residential densities, impacts on National Landscape or other landscape impacts, and any housing-related topic papers that the Council has produced to date.

This information should be provided within three weeks of the date of this letter. Following consideration of the evidence, I will determine whether the further use of the Secretary of State's powers under section 21 and/or section 27 of the 2004 Act is required to make the plan satisfactory.

Notwithstanding this direction, I would like to give you an opportunity to set out by 24 June 2026 any exceptional circumstances which in your view suggest that intervention is not appropriate in this case. To be clear, this neither alters nor removes the direction set out in this letter.

Whilst I hope that the Council will continue to engage constructively with my department, I must be clear at this stage that I will not hesitate to take further action if this request is not complied with.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Matthew Pennycook', with a large, sweeping loop at the end.

MATTHEW PENNYCOOK MP
Minister of State for Housing and Planning

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TORBAY COUNCIL



Draft Torbay Local Plan 2025-45: A Landscape to Thrive

Regulation 19 Draft Local Plan (including minerals and waste) June 2026

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What is a Local Plan?

Local Plans set out policies for:



The emerging Local Plan for Torbay will shape the future of the area. It will help balance local development needs with protection of the environment, local character and resources

Figure 1 - What is a Local Plan?

Chapter 1: Our shared vision - A healthy, happy and prosperous Torbay

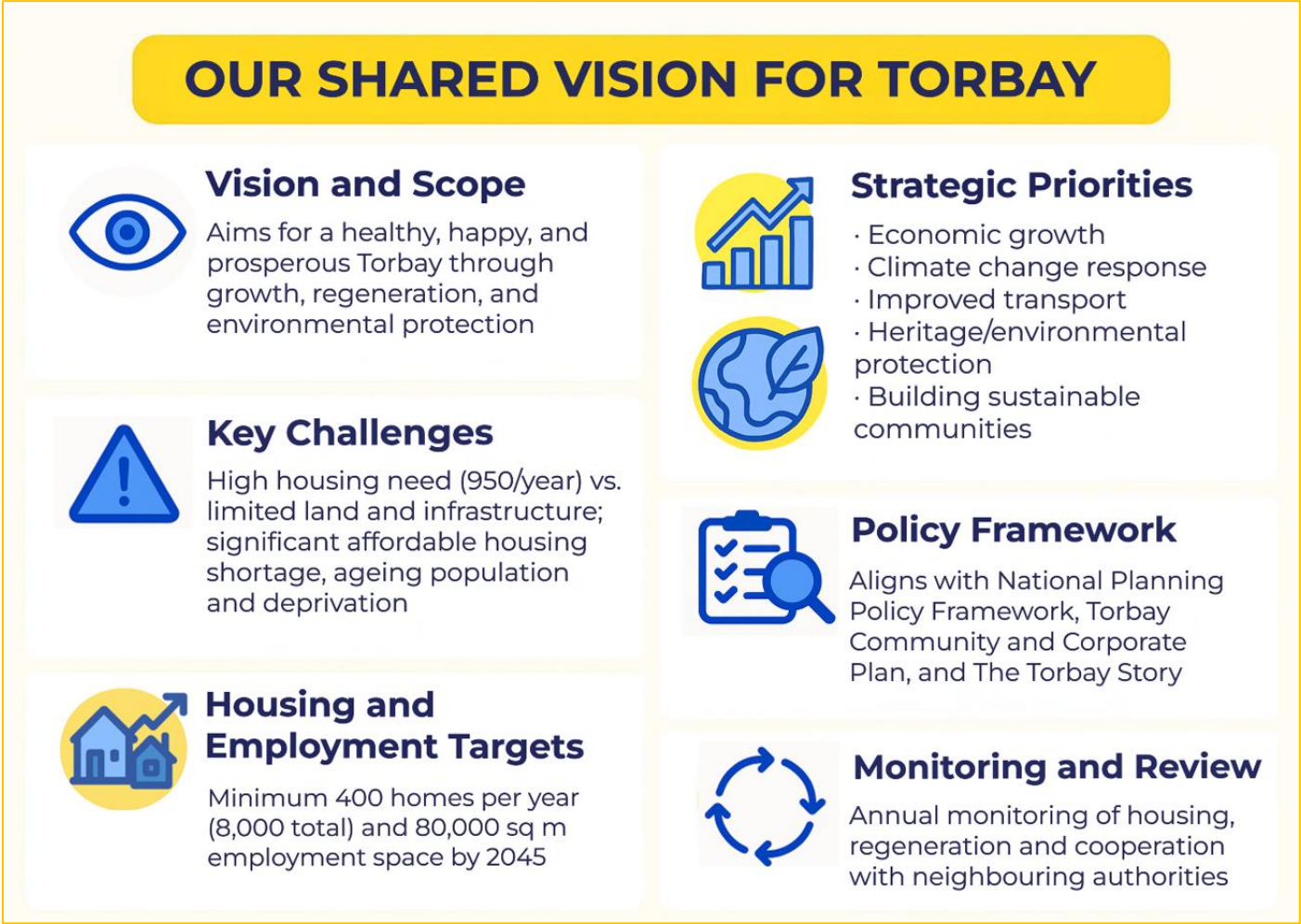


Figure 2 - Our shared vision

Introduction

The scope of this Plan

- 1.1 This is the draft Local Plan for Torbay. It is a Plan for growth, within environmental limits, and strongly promotes regeneration and modernisation of the built-up area. It seeks to minimise damage to the natural environment and to provide resilience to the effects of Climate Change whilst reducing carbon emissions.

- 1.2 The Plan contains a strong Presumption in Favour of Urban Regeneration and support for affordable housing. It seeks to achieve an average of 400 dwellings per year over the Plan period 2025-45. This is a minimum number and not a ceiling, should sustainable urban sites be available to exceed this figure. It is also proposed to deliver a minimum of 80,000 sq. m. (up to 28ha) of employment land. It will be important to provide sufficient affordable housing and family homes in order to reduce the risk of labour shortages. The plan also prioritises addressing Climate Change.
- 1.3 The Plan is not intended to be a sales-pitch document. However, it seeks to implement and provide a positive planning framework to implement other key visions and strategies in particular:
- The council's Corporate and Community Plan 2023-43
 - The Torbay Story
 - The Housing Strategy
 - Regeneration and the Accommodation Repurposing Programme (including the "Hotels to Homes" initiative).
- 1.4 When adopted, the Plan will form the legal starting point for determining planning applications and related proposals in Torbay. Decisions are still subject to other material considerations, especially those set out in the government's National Planning Policy Framework (NPPF, currently December 2024), Planning Practice Guidance (PPG) and National Development Management Policies.
- 1.5 This plan will replace the Torbay Local Plan 2012-30. It covers the period 1st April 2025-31 March 2045. But realistically, the Plan will require a review five years from adoption. This version of the Plan is the "Regulation 18" draft plan. This means that it is at an early stage of consultation where people's views can be considered. It builds on, and fleshes out, the January 2022 Growth Options consultation and the October 2022 Housing Site Options consultations.
- 1.6 Local Plans are prepared within the strict parameters and legal framework that the government sets. These are set out in legislation but also the National Planning Policy Framework **National Planning Policy Framework - GOV.UK** and accompanying planning practice guidance.
- 1.7 The Local Plan is required by planning law to promote sustainable development. This means applying the Presumption in Favour of Sustainable Development in Paragraph 11 of the Framework. Although the "Regulation 18" stage is a chance to "have your say" the Local Plan must follow planning law and guidance.

- 1.8 Comments made on the draft Local Plan will be used to compile a “Regulation 19” Publication Plan, which we intend to consult on in Summer 2026. This next Plan is often called a “preferred option” because it sets out what the council consider to be a sound plan. Consultation on this is much more restricted to whether the Plan meets its legal requirements or the “Tests of Soundness” set out in paragraph 36 of the NPPF. It is intended to submit the Local Plan to the Secretary of State for Examination before the end of 2026. Further information can be set out in the council’s Local Development Scheme **Local Development Scheme - Torbay Council.**

Challenges for the Plan

- 1.9 Torbay faces significant challenges but also opportunities. We need to be realistic and acknowledge that Torbay has a significant need for development, but limited space or environmental capacity to grow, and limited viability to support its infrastructure and other needs.
- 1.10 Torbay has a significantly ageing population and needs to plan for the implications of this. It needs to encourage a younger demographic, particularly working age families, as well as provide for the needs of older people. This will be important to meet Torbay’s economic regeneration goals.
- 1.11 Torbay’s fantastic environment is its unique selling point. It is justly branded the English Riviera, with a world class tourism offer. It has glamour, high-profile businesses, a beautiful marine setting and internationally important environmental assets. This is accompanied by a rich historic and prehistoric environment. Torbay faces challenges arising from Climate Change and a need to reduce carbon emission and provide resilience to the effects of a changing climate. Development is likely to impact upon the South Hams SAC and the Lyme Bay and Tor Bay Marine SAC, and this needs to be mitigated. Torbay’s best asset is its spectacular environment, and it is vital that development does not erode that. Hence the need to double down on urban regeneration and focus growth in the built-up area. Including building upwards where necessary and feasible.
- 1.12 Like the previous Torbay Local Plan, this is a plan for growth within environmental limits, but the above seeks to be realistic about the scale of the challenges and the scope of a Local Plan to contribute to solutions. The solutions are wider than planning and it is critical that the land use framework supports the council’s wider regeneration programmes.
- 1.13 The Local Plan is intended to be a strategic document. It interacts with and provides a land-use planning framework for other detailed visions, masterplans, and neighbourhood plans.

The National Planning Policy Framework (NPPF)

- 1.14 The NPPF has a legal weight in plan making. Councils are required by law to prepare a local plan and to seek to achieve sustainable development. Key to this are the Presumption in Favour of Sustainable development at paragraph 11 (a-b) of the NPPF and the Tests of Soundness (Paragraph 36). The NPPF sets out what Local Plans should include:

15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

16. Plans should:

(a) be prepared with the objective of contributing to the achievement of sustainable development (legally required under S39(2) of the Planning and Compulsory Purchase Act 2004).

(b) be prepared positively, in a way that is aspirational but deliverable;

(c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

(d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

(e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

(f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

17. The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area.

There is an expectation that Local Plans should be strategic in nature and should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for:

a) homes (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

- 1.15 The NPPF is supported by online Planning Practice Guidance. The Levelling Up and Regeneration Act 2023 allows the Secretary of State to publish National Development Management Policies (NDMPs) which when published will take primacy over local plans where they are in conflict.
- 1.16 Within these parameters, there are important local documents, visions and blueprints that the Local Plan seeks to support and ensure that land use decisions are aligned with meeting these community and corporate goals.

The Torbay Community and Corporate Plan 2023-43

- 1.17 The Corporate and Community Plan sets out the council's Vision, Objectives and Priorities, and to provides the strategically grounded foundation for everything the council does. This includes informing strategic, operational strategies, plans and policies including the Local Plan.

The Corporate and Community Plan perceptively states: “Despite everything that is fantastic about Torbay, we know that we face challenges and that some parts of the Bay suffer from nationally

significant levels of poverty. There is huge potential, and this Plan brings together the interlinked priorities we need to address to make Torbay a happy, healthy and prosperous place for our whole community”.

The Plans’ Vision Statement is:

We want to see a healthy, happy and prosperous Torbay.

Torbay is a glorious part of Devon with an inspiring natural environment. We are a magnet for tourists and known as the English Riviera. We are home to globally significant technology businesses and have a rich leisure and cultural scene.

We want to deliver for our people and our place. We know we have challenges, but we have high aspirations. By continuing to work closely with our communities and partners and capitalising on our strengths, we want make Torbay a great place to do business – a place where everyone is able to live their best life.

A healthy, happy and prosperous Torbay for all.

To achieve this the Corporate and Community Plan identifies three strategic themes, all of which are relevant to the Local Plan:

- **Community and People**
- **Pride in Place**
- **Economic Growth**

1.18

Boxes like this feature after policies throughout the Plan. These indicate how the policy aligns with the visions and themes of the Community and Corporate Plan.

1.19 Land use planning policies are integral to Pride in Place and play a substantial role in community and people and achieving economic growth. The Corporate and Community Plan objectives as follows: .

People Priority

Support real, sustainable change for those in greatest need within our communities, to thriving communities where people can prosper. This should have regard to the following priorities:

- Ensure our town centres are safe and welcoming for all.
- Keep children safe in their communities and provide safe environments for our young people to thrive in.
- Ensure early intervention is effective and targeted.
- Provide the best care and support available so that residents are empowered to achieve what matters most to them.
- Provide clear signposting for those needing our help.
- Support and encourage community action.
- Improve wellbeing and reduce social isolation.

Pride in Place Priorities

Support investment in the three town centres to enable them to develop their own distinctive roles, including supporting the provision of affordable housing in town centres. Regeneration of brownfield urban sites will be supported in principle.

Regard should be had to the following priorities:

- Draw investment into our towns and breathe life into our town centres, partnering with the private sector to deliver major projects.
- Maximise heritage and cultural opportunities for the enjoyment and benefit of residents and visitors.
- Ensure the effective operation of SWISCo to have resources to reinvest in Torbay.
- Deliver priority capital projects within the council's Capital Programme.
- Improve the delivery, affordability and quality of housing (including housing standards) for residents in Torbay.
- Improve the delivery of our planning service.
- Protect and enhance our lived, built and natural environments, including our green spaces.

Economic Growth Priorities

To attract, retain and grow the economy to create good quality and learning opportunities, and to retain and attract the workforce that Torbay needs including the provision of affordable housing and opportunities for investment in employment.

This should have regard to the following priorities:

- **Encourage aspiration, providing opportunities for everyone to raise their skill level, particularly in high value careers.**
- **Drive training opportunities across all sectors to empower people to improve their skills.**
- **Improve transport links to and within Torbay.**
- **Develop a year-round economy.**
- **Increase the amount of full-time employment opportunities within Torbay.**
- **Focus on inclusive growth, with opportunities which benefit everyone.**

The Torbay Story

1.20 The Torbay Story is a strategic initiative aimed at transforming Torbay's prospects whilst celebrating and enhancing its glorious natural assets and heritage. The Torbay Story is the Torbay Place Leadership Board's springboard to promote investment, regeneration, and community development across Torbay. The initiative encourages collaboration between public and private sectors to unlock Torbay's full potential.

1.21 It aims to celebrate and realise the fantastic opportunities for Torbay to be:

- The Premier Marine and Natural Experience
- A hub for adventurers and tech innovation
- A place to invest, live, and thrive

1.22 The Torbay Story promotes "tech by the bay" seeking to improve Torbay's amazing knowledge based businesses scattered across the amazing environment. Whilst there is limited (but important) manufacturing; the Bay has a massive knowledge-based economy based on ideas, innovation thinking and ingenuity, with many globally significant companies in photonics (the science of light), environmental science, marine engineering, green technology, medical technology etc. The Torbay Story aims to grow relationships with regional universities and to encourage start-up business and benefit for the clusters of

similar businesses. The spectacular environmental benefits of Torbay to live and work in are key to this.

- 1.23 The Torbay Vision wants the area to be a Hub for Active Adventurers enabling people to better curate their health and especially mental health by providing a connection with nature, with endless recreation activities in Torbay's globally important countryside and marine environments.
- 1.24 The "Big idea" for Torbay is for an overall Torbay as The Premier Marine and Natural Experience. This idea is intended to help the public, private and voluntary sectors think differently to better utilise Torbay's assets, radiate influence, cultivate and encourage strong leadership and developing new relationships to bring business and place together,
- 1.25 Within this "strategic signature" a vision for each town is set out, to develop their own distinct identities and roles to create a unified and complementary offer.
- 1.26 Brixham is a centre for creative arts and industries, Food and Fishing Fusion. Paignton is Family Fun on the Foreshore offering traditional values to the best standard it can be with beautiful sandy beaches, nearby zoo, steam railway and oldest surviving cinema in Europe. Paignton is also home to clusters of "tech by the sea" high tech businesses. It is therefore also a centre for Enterprise, Electronics and Entrepreneurship. Torquay is the heart of the English Riviera and a premier holiday experience with the marina, waterfront, Agatha Christie Heritage, UNESCO Global Geopark, food and drink, leading on Leisure and Lifestyle by the Sea.

Town Regeneration Projects

- 1.27 A range of transformative projects and opportunities aimed at revitalising key areas are proposed as part of the Torbay Story and the council's wider regeneration programmes. Key to this is a range of ambitious urban regeneration projects, all of which are embraced and proposed for development in the Local Plan. These include:
 - Stand Torquay
 - Union Square Torquay
 - Crossways Centre Paignton
 - Victoria Centre, Paignton
 - Wider regeneration to create jobs, invest in key economic sectors such as "tech by the sea" knowledge-based industries and MedTech
 - Working with the Plan for Neighbourhoods to help realise a 10-year strategy to help those in most need in Torquay.

Other Visions and Strategies

1.28 The above documents set out a high-level vision for Torbay. The Local Plan lays out a land-use basis to realise those visions. Both the Local Plan and its supporting documents are informed by other Plans and Strategies. Where relevant, these will be referred to in the Policy Explanations and explained in more detail in background topic papers.

1.29 Some of the key documents are:

- Economic Growth Strategy - Torbay Council
- English Riviera Destination Management Plan - Torbay Council
- Housing Strategy 2023 to 2030 - Torbay Council
- Greener Way for Our Bay Framework and Action Plan – Torbay Council
- Torbay Council Climate Change Action Plan - Torbay Council
- Environment and Net Zero Carbon Policy - Torbay Council
- Joint Health and Wellbeing Strategy 2022-2026 – Torbay Council
- Devon and Torbay Local Transport Plan 4 2025 to 2040 – Devon and Torbay Combined Authority

Local Plan Key Objectives

1.30 The Previous Torbay Local Plan 2012-30 sets out several key aspirations. These are still largely consistent with the objectives in the NPPF, Community and Corporate Plan and The Torbay Story. The proposed aspirations are set out below but have been amended to confirm that they are the Plan's strategic priorities. They also take into account:

- A higher priority to urban regeneration and the provision of affordable housing, and more established programmes for delivering these.
- Responding to Climate Change being given a higher priority.
- A focus on matters that land use planning is able to control (e.g. land use allocation) rather than things beyond the control of planning.

1.31 This Plan has five strategic priorities for the Bay:



Figure 3 - The Five Strategic Priorities for the Bay

1.32 These aspirations are interconnected, but at their heart is the need to focus development on urban renewal in order to protect the wider environment.

Strategic Priority 1: Secure Inclusive Economic Growth for All

1.33 To achieve economic growth and deliver new jobs and housing, in order to promote equality, reduce disadvantage and poverty and increase Torbay's competitiveness. This will be achieved by meeting the following objectives:

- To strongly support town centre and other urban regeneration to provide more home, including affordable housing, jobs and commercial development. The Plan sets out a Presumption in Favour of Urban Regeneration.

- To drive forward regeneration schemes and provide sufficient land and co-ordinated infrastructure to achieve sustainable growth.
- To boost the supply of affordable housing.
- To provide sufficient, varied full-time employment and increase earning potential.
- To support existing employment sectors whilst providing land, training opportunities and a positive climate to encourage new employment, particularly in the knowledge based, high tech and medical technology sectors.
- To ensure the English Riviera achieves its potential as a premier tourist resort by continued investment in existing facilities, waterfront areas and marine environment, and the provision of new attractions.
- To cater for changing holiday demands and expectations to attract new visitors, investment in high quality facilities and accommodation, whilst releasing outdated accommodation and facilities for housing.
- To encourage a younger demographic in Torbay, including retaining college leavers by providing better job and training opportunities and better access to housing.
- To provide a range of goods, services, events and facilities that make Torbay a leading destination of choice for people with money to spend, particularly new and improved provision in the town centres.
- To strengthen Torquay town centre as the Heart of the English Riviera and a retail commercial, social and cultural focal point. Paignton and Brixham town centres to develop their role, on a proportionate basis, focused on meeting the needs of their own residents and tourists.

Strategic Priority 2: Respond to Climate Change and Protect our Communities

1.34 To ensure the use of energy and natural resources, the sensitivity of the natural environment and public health needs are taken into consideration when planning new development. This will be achieved through meeting the following objectives:

- To promote the installation of low carbon and renewable technologies, particularly making better use of existing and new roof spaces for solar energy.
- To improve the energy efficiency of new developments, and existing buildings, to reduce the reliance on fossil fuels and the impact of rising utility bills on poverty.
- To roll out a network of electric charging for vehicles and other infrastructure needed to transition to a low-carbon economy.
- To become resilient and adaptable to climate change.

- To minimise flood risk to new and existing development by incorporating sustainable drainage and other measures to address run-off, sea level rise, increased storminess and unpredictable weather.
- To recognise the multiple benefits provided by open spaces, biodiversity, green infrastructure such as green corridors/wedges, rural landscapes, beaches and the Bay itself, having regard to their statutory significance and value to the community over the lifetime of development.
- To minimise the generation of household, business and construction waste and reduce its negative impacts upon the environment by focusing on the prevention, re-use and recycling of waste as set out in the waste hierarchy and prevent pollution.
- To support the growth of environmental technology and related businesses in Torbay.
- To resist the installation of fossil fuel dependent infrastructure or facilities.

Strategic Priority 3: Connect Communities through Improved Accessible Transport and Technology

1.35 To ensure that Torbay has excellent accessibility and connectivity within the Bay and elsewhere. This will be achieved by meeting the following objectives:

- To increase accessibility throughout the Bay and beyond with fast, frequent, reliable and sustainable travel, giving people real choice as to how they make their journeys.
- To encourage active travel to promote health and environmental sustainability.
- To deliver an integrated transport system, providing a choice of transport and supporting walking, wheeling, cycling and public transport.
- To improve road, rail links, walking, wheeling and cycling routes, to reduce congestion and environmental impact.
- To promote water-based transport in the Bay, for both work and leisure.
- To ensure the safe and convenient movement of people and goods.
- To minimise the length of journeys for employment, shopping and other activities by the careful siting of development and through the detailed planning of the mix of uses in growth locations.
- To require the creation of permeability for active travel in all major development and to mandate interconnectivity between adjoining developments.
- To provide next generation broadband connections.

Strategic Priority 4: Protect Torbay's Natural, Cultural and Built Heritage

1.36 To conserve and enhance the richness and diversity of the built, historic, marine and natural environments, which provide Torbay with its unique setting and important economic benefits. This will be achieved by meeting the following objectives:

- To safeguard existing and maximise opportunities for biodiversity enhancement in and around developments to deliver a net gain for biodiversity.
- To provide a network of recreation and Green Infrastructure including Suitable Alternative Natural Greenspace (SANG) to relieve recreational and other pressure on the South Hams Special Area of Conservation and other critical environmental assets.
- To ensure new development makes a positive contribution to local character and identity, including the wider landscape character river corridors, open spaces, country parks and natural areas and setting of proposals.
- To safeguard the Best and Most Versatile Agricultural Land to assist with food security in a changing environment.
- To safeguard heritage assets including those at risk in a manner proportionate to their significance, having regard to their ability to deliver economic regeneration, express local identity, reveal social histories and narratives and increase the connection of communities with place.
- To avoid mediocre design by the application of clear design standards, including the use of Torbay's Design Review Panel to maintain quality development that is well integrated in its surroundings and responds successfully to local character.
- To require conversions and extensions positively to enhance the existing building, especially in Conservation Areas, removing unsympathetic extensions and rectifying poor quality alterations where necessary.
- To encourage the re-use of empty homes and businesses, including bringing back historic buildings into beneficial use.
- To make the most of the English Riviera's status as the world's first internationally recognised Urban Geopark in recognition of its geological, historical and cultural heritage and sustainable tourism value.

Strategic Priority 5: Build Better Communities with the Homes, Spaces and Opportunities that People Deserve

1.37 To meet the needs of Torbay's residents, including disadvantaged, care-experienced, and minority groups, and to provide everyone with a full range of opportunities in life. This will be achieved through meeting the following objectives:

- To build enough houses to give all Torbay residents a chance of a decent home.
- To end the cycle of deprivation linked to substandard accommodation and resist inappropriate conversions and poor design where this may exacerbate disadvantage and deprivation.
- To provide a range of supporting living opportunities to assist existing Torbay residents live independently in their own home for as long as possible, whilst providing and supporting facilities to minimise social isolation. .
- To resist development that will create additional costs to the healthcare and social services, unless the impact of these is fully funded.
- To provide a full range of facilities and shops within town centres necessary to meet day to day needs, particularly the provision of fresh food.
- To resist inappropriate development that would harm the vitality and viability of town centres.
- To diversify the leisure and cultural offer in the town centres, particularly the night time economy in Torquay.
- To create a more enjoyable, creative built and natural environment using heritage assets, public art and revitalisation of the public spaces to attract events, exhibitions and festivals that celebrate and enhance the culture of Torbay.
- To allow tall buildings in appropriate locations where this secures wider regeneration benefits, particularly where informed by Town Centre and other masterplans taking into account design parameters and impacts.
- To provide a suitable and sustainable range of physical and community infrastructure to promote economic prosperity and social cohesion, spiritual wellbeing and contribute towards higher aspirations and achievement, particularly amongst the young.
- To support the expansion and improvement of existing educational establishments, especially South Devon College, and plan positively for new education and lifelong learning, and links to employment especially in the knowledge based economy.
- To help tackle hotspots of child poverty, multiple deprivation, high levels of crime and unemployment wherever they arise.
- To support new and enhanced recreational, play and leisure facilities, to promote health and social wellbeing for all, including young people.
- To create sufficient burial and ceremonial spaces, as part of the green infrastructure offer to provide dignified resting, ceremonial and remembrance facilities.

Housing Numbers

- 1.38 The Plan supports a minimum of 8000 homes for Torbay. This will require a significant uptick in urban regeneration and increased urban living. There is a particular need to boost the supply of affordable housing.
- 1.39 Detailed assessment of spatial options for growth has shown town centres, Torquay Gateway and West Paignton as the most sustainable locations. These will require updated masterplans.

Natural and Historic Environmental Capacity

- 1.40 Crucially, the Plan recognises the unique quality of the Bay's natural environment. This attracts people, investment, businesses and visitors. It is vital this Plan protects and enhances that quality, to bring more investment, more visitors and more people into the Bay. Torbay enjoys a significant historic built environment, and there is a need to conserve and enhance the most important heritage assets, and also improve the quality and perception of parts of the built up area, to assist urban renewal. As a UNESCO Geoparks Torbay also has internationally significant geological and palaeontological value.

Sustainability Appraisal

- 1.41 The Local Plan is supported by a Sustainability Appraisal (SA). This assesses the environmental, social, and economic impacts of the Local Plan, and includes legal requirements from UK and European regulations. The SA helps make sure that the Local Plan:
- Promotes sustainable development
 - Avoids harmful impacts on people and the environment
 - Considers different policy options and chooses the most balanced and beneficial ones
 - Includes ways to prevent or mitigate negative effects.

Land and Labour Supply

- 1.42 The Local Plan, working alongside Torbay's Economic Growth Strategy supports a step change in the economic fortunes of the Bay. The Plan seeks to provide a minimum of 80,000 sq. m of employment land over the Plan period. The Local Plan seeks to set out a positive land use framework to support businesses, and particularly urban regeneration.
- 1.43 A key economic threat is a shortage of working-age people due to Torbay's ageing demographic. It will therefore be important to boost the supply of affordable housing and family homes to support economic recovery. It will also be critical to support the needs of young people, especially care-experienced, to enter the local jobs market, for example through local training agreements. There is a need to provide specialist accommodation for older people, but this must be focused on meeting the needs of existing residents and supporting people to downsize.

Infrastructure

- 1.44 The Local Plan recognises the need to invest in infrastructure across the Bay – whether in green infrastructure or additional road capacity. Much is already being planned to improve infrastructure: a new rail halt at Edginswell; an enhanced ferry service across the Bay; increased capacity on the Western Corridor, and flood protection scheme at Paignton.
- 1.45 At present, infrastructure 'pinch points', such as shared sewers in the town centres, the need for better resilience to climate change, and the need to improve the management of the South Hams Special Area of Conservation are potential constraints. The Plan sets out flood resilience, water management and Green Infrastructure proposals to address these issues.
- 1.46 The level of growth planned for in the Torbay Local Plan 2012-30 is unlikely to be exceeded until well into the 2030s, and therefore it is not thought that there are likely to be other infrastructure "show stoppers" in terms of water or power availability. However, this will be kept under review as the Plan progresses.
- 1.47 The level of environmental constraint and access difficulties get more significant in the south of Torbay, particularly south of Windy Corner. The Plan therefore seeks to focus more strategic development in Torquay and Paignton, with more localised development proposed in the Brixham Peninsula focussed at meeting the more localised needs and its fishing and food specialisms.

Monitoring

- 1.48 The Local Plan will be monitored annually against the delivery of new homes, affordable housing and urban regeneration. The council will set these out in its Authorities Monitoring Report **Adopted Local Plan (2012–2030) Evidence Base and Monitoring - Torbay Council**.

Duty to Cooperate

- 1.49 The government is proposing a system of strategic planning in the Planning and Infrastructure Bill. At present councils are still under a Duty to Cooperate with neighbour authorities and other key consultees/ prescribed bodies. The Localism Act 2011 requires councils to co-operate with their neighbours “constructively, actively and on an ongoing basis” when preparing local plans. The extent of co-operation is a key test of soundness of the Plan.
- 1.50 Although Torbay is a largely self-contained housing market area (HMA) and Functional Economic market Area (FEMA), its population growth is entirely driven by inwards migration. This is largely from people moving from elsewhere in the UK. Whilst the closest neighbours are Teignbridge and South Hams, the council considers that unmet housing need, (as calculated by the Standard Method and demographic projections) is a sub-regional matter that needs to be resolved in cooperation with wider Devon Authorities.

Navigating the Local Plan

- 1.51 The Local Plan is set out in theme-based chapters. The NPPF requires Plans to indicate where a policy is strategic. Each subject is prefixed with an overarching strategic policy (HS, ES etc.) however other policies in the Plan are strategic and these are indicated. The NPPF indicates that strategic policies are those that are necessary to address the strategic priorities for the area (including cross-boundary matters) but should not extend to more detailed matters.
- Chapter 1: Our shared vision - A healthy, happy and prosperous Torbay (this chapter)
 - Chapter 2: Shaping our places - Local identity and community-led planning
 - Chapter 3: Homes for all - Meeting Torbay’s housing needs
 - Chapter 4: Building a prosperous and inclusive Torbay - Unlocking opportunity for all
 - Chapter 5: Thriving communities - Wellbeing, safety and belonging
 - Chapter 6: Moving Torbay: Sustainable travel and inclusive access
 - Chapter 7: Building for the future: Resilient and smart infrastructure
 - Chapter 8: Our changing climate: Protecting our Bay for future generations
 - Chapter 9: Our natural places: Protecting and enhancing Torbay’s environment

- Chapter 10: Our shared history: Protecting and enhancing Torbay's heritage and identity
- Chapter 11: Designed with quality: Taking pride in Torbay's place-making
- Chapter 12: Responsible resource use: Minerals and waste
- Chapter 13: Making it happen: Monitoring and partnership working

Chapter 2: Shaping our places - Local identity and community-led planning



Figure 4 - Local Identity and Community-led Planning

Torbay

The Premier Marine and Natural Experience

A Plan for a healthy, happy and prosperous Torbay

2.1 The Local Plan seeks to balance the need for growth with the protection of the environment and responding to the Climate Emergency. It actively promotes urban regeneration that creates sustainable living, working and leisure environments, supported by high quality infrastructure. The strategy seeks to support the provision of affordable

housing to meet local needs. This will be achieved within the Bay's built and natural environmental and infrastructure capacity. As described in Chapter 1, the Plan will deliver on the priorities and vision of the Corporate and Community Plan 2023-43 and the Torbay Story.

Spatial Strategy and Area Policies

Strategic Policy SS1: Torbay Growth Strategy - Prioritising our communities through improved health, housing, place making and opportunities for all

All development should support the achievement of Torbay Community and Corporate Plan 2023-43 priorities. In particular, proposals should support achieving People, Pride in Place and Economic Growth priorities as far as relevant and proportionate.

Spatial Strategy

Torquay will remain the largest town within Torbay. Major urban regeneration in the town centre and waterfront is proposed to support its housing, retail and tourism role as the Heart of the English Riviera.

Paignton will retain its family tourism role, particularly around the Esplanade and beaches and will provide better public transport and active travel links to other tourist attractions within Paignton and beyond.

Brixham and its rural hinterland will accommodate more limited development consistent with meeting its local needs and supporting its role as a major fishing port and high quality food and leisure centre of excellence.

All development must be well designed having regard to function, visual appearance and add to the overall quality of the area. All development should contribute to safeguarding the area's natural and built environment. The highest level of protection must be afforded to European Wildlife Sites.

Development will be supported by the timely delivery of Infrastructure. This includes, but is not limited to measures needed to make development safe and resilient to the effects of climate change and water management, and achieving no increase in water entering combined sewers.

All development will make full and appropriate use of opportunities for low carbon and renewable energy technologies, consistent with the need to reduce Torbay's carbon footprint, and provide resilience to climate change. All development must be supported by appropriate and proportionate evidence setting out how it mitigates and adapts to climate change.

Planning has a key role to play in shaping healthy neighbourhoods where people of all ages can live, work and thrive. Homes, jobs, transport and environments can be important enablers of good health when delivered well. Development will positively address health inequalities in Torbay.

Development should, as far as practicable, improve transport connectivity and make provision for accessibility by walking, wheeling, cycling and public transport and maximise opportunities for active lifestyles.

Development should provide and support facilities that will enable social and spiritual well-being and minimise social isolation.

The Plan supports the creation of at least 80,000 sq. m of Class E(g)/B2/B8 net employment space over the Plan period, equal to at least 20 ha. with an emphasis on bringing employment space forward as early as possible in the Plan period. Future Growth Areas and strategic developments will be brought forward as mixed use developments including the provision of employment.

The Plan also seeks to deliver at least 8,000 new dwellings over the Plan period of 2025-2045 equal to an average of around 400 dwellings a year over a 20-year Plan period.

Proposals for housing on previously developed land within the settlement boundary will be supported unless they cause substantial harm to the economy, environment or amenity. Proposals should contribute to creating mixed and balanced communities and avoid creating concentrations of deprivation or compounding the older demographic structure of Torbay. The council will apply the Presumption in Favour of Sustainable Development to proposals for brownfield regeneration within settlement boundaries that meet these criteria, even where the Local Plan's housing target is exceeded.

Town Centres

Town centre regeneration schemes will be brought forward and supported where appropriate through master planning. Regeneration and urban densification schemes are identified around Torquay Gateway to Torre and Preston District Centre.

Future Growth Areas

Future Growth Areas, shown outlined in red on the Key Diagram and shown on the policies map are foci for delivering growth and change in the Bay over the Plan period. They are allocated in the plan as strategic and sustainable broad locations for new employment space, homes, and infrastructure over the Plan period. They are:

SS1.1 Torquay Gateway

SS1.2 West of Paignton

Development in Future Growth Areas should come forward in accordance with updated masterplans, and/or in neighbourhood plans. They will deliver a balance of jobs, homes, and infrastructure, including green infrastructure. At least 30% of new homes should be provided as affordable housing. A minimum of 25% should be provided as employment use, with a preference for on-site provision, or through developer obligations towards job creation or urban regeneration where not possible.

Other Housing Allocations

Other housing allocations are proposed in Policy H3 of the Plan and should be brought forward in accordance with the requirements in Policy H3, and provide affordable housing in accordance with Policy H7.

Major development proposals outside the built-up area, Future Growth Areas and allocated sites will only be supported where all of the following are met:

The proposal is subject to an environmental assessment that shows that:

- i) it is acceptable in terms of landscape, biodiversity and infrastructure impacts, including consideration of the cumulative impact of development and;
- ii) It is demonstrated that there is no likely significant effect, alone or in combination, on European Wildlife sites (or equivalent designation); and
- iii) Is demonstrated to meet an economic, social or environmental need that significantly and demonstrably outweigh the impacts of the proposal.

Community and Corporate Plan – Community and People, Pride in Place, Economic Growth

Explanation

- 2.2 This policy sets out a growth strategy for Torbay for the period 2025-2045. The Plan relies very heavily on regeneration of brownfield sites and other urban areas to maximise its development opportunities and deliver on town centre regeneration programmes, drawing investment into our towns and breathing life into our town centres. The Local Plan contains a brownfield Presumption in Favour of Sustainable Development and is highly supportive of urban brownfield development, especially in town centres. This is applied at all times and is not dependent upon a five-year supply being demonstrated. The Policies Map defines the settlement boundaries around Torbay's main towns. The term "settlement boundary" is defined in the NPPF, and has the same functional meaning as "within the built up area". The Key Diagram below summarises broad locations for growth in the Local Plan.
- 2.3 The Local Plan proposed a minimum of 400 dwellings a year, equal to 8,000 dwellings over the Plan period. The broad distribution of development is set out in table 1 below. This is below the government's Local Housing Needs target (of 950 dwellings a year) but seeks to maximise the delivery of homes within Torbay's significant environmental and infrastructure limits, and high level of constraint. It would represent a return to housing delivery levels not seen since the early 2000s and the more benign economic climate of that time. The figure also sets out a bold target in light of limited economic viability to deliver new homes through the market, despite there being a high level of need.
- 2.4 The Local Plan seeks to provide 80,000 sq. m of employment space and will especially safeguard key local economic sectors such as high-tech manufacturing, medical technology, and the maritime/fishing industries. Torbay is a premier tourism resort, and safeguarding its spectacular environment is critical to maintaining and developing this role
- 2.5 Within Torbay, the larger towns of Torquay and Paignton are expected to provide the main growth areas, particularly within the built-up areas settlement boundaries and Future Growth Areas at Torquay Gateway and to the West of Paignton.
- 2.6 The Bay has a rich biodiversity, geodiversity and historic environment which all contribute to its setting as a resort, in addition to being of value in their own right. It is important that development respects Torbay's important environmental assets. Notwithstanding this, the Plan recognises the need for some greenfield expansion in order to help meet needs.
- 2.7 Brixham and its surroundings are the most environmentally constrained by the South Devon National Landscape (formally AONB), South Hams Special Area of Conservation (SAC) and travel times affected by the peninsular nature. Some limited development is proposed in the National landscape aimed at meeting Brixham's local needs and supporting the local economy.
- 2.8 The Local Plan recognises the significant challenges that climate change will create and the adaptations that will be needed. Proposals should contribute towards carbon reduction

through location, design and orientation. All development will be expected to submit an Energy Statement proportionate to the nature and scale of development. Proposals will also need to ensure that they are resilient to the effects of climate chaos, particularly in terms of flood, heat and drought resilience.

- 2.9 Torbay has Bay wide coverage of neighbourhood plans, which were adopted (“made”) in June 2019 and are now in need of refreshing. It is hoped that new Neighbourhood Plans will be brought forward to support community aspirations about how development in their area will look and feel. The Local Plan sets out strategic development (SD) policies for Torquay, Paignton, Broadsands Churston and Galmpton Villages (BCG Villages), and Brixham. These provide a framework for neighbourhood planning based on the current neighbourhood area arrangements, although these could change and the Local Plan is not proposing fixed neighbourhood areas.
- 2.10 The Local Plan proposes sites for major development. Major development is defined by the General Permitted Development Order (GPDO) and is generally taken to be 10 dwellings or 1,000 sq. m (whichever is smaller).

Table 1 Local Plan Housing and Employment Targets

Local Plan Housing and Employment Targets by Neighbourhood Plan Area.			
	Annual Housing target	Over 20 years. 2025-45	Class E(g), B2,B8 Employment Uses. 2025-45
Torquay	180	3,600	37,000 sq. m
Paignton	170	3,400	37,000 sq. m
Brixham (Town Council area)	20	400	5,000 sq. m
Broadsands, Churston and Galmpton Villages	30	600	1,000sq. m
Torbay	400	8,000	80,000

TORBAY LOCAL PLAN 2025-2045 KEY DIAGRAM

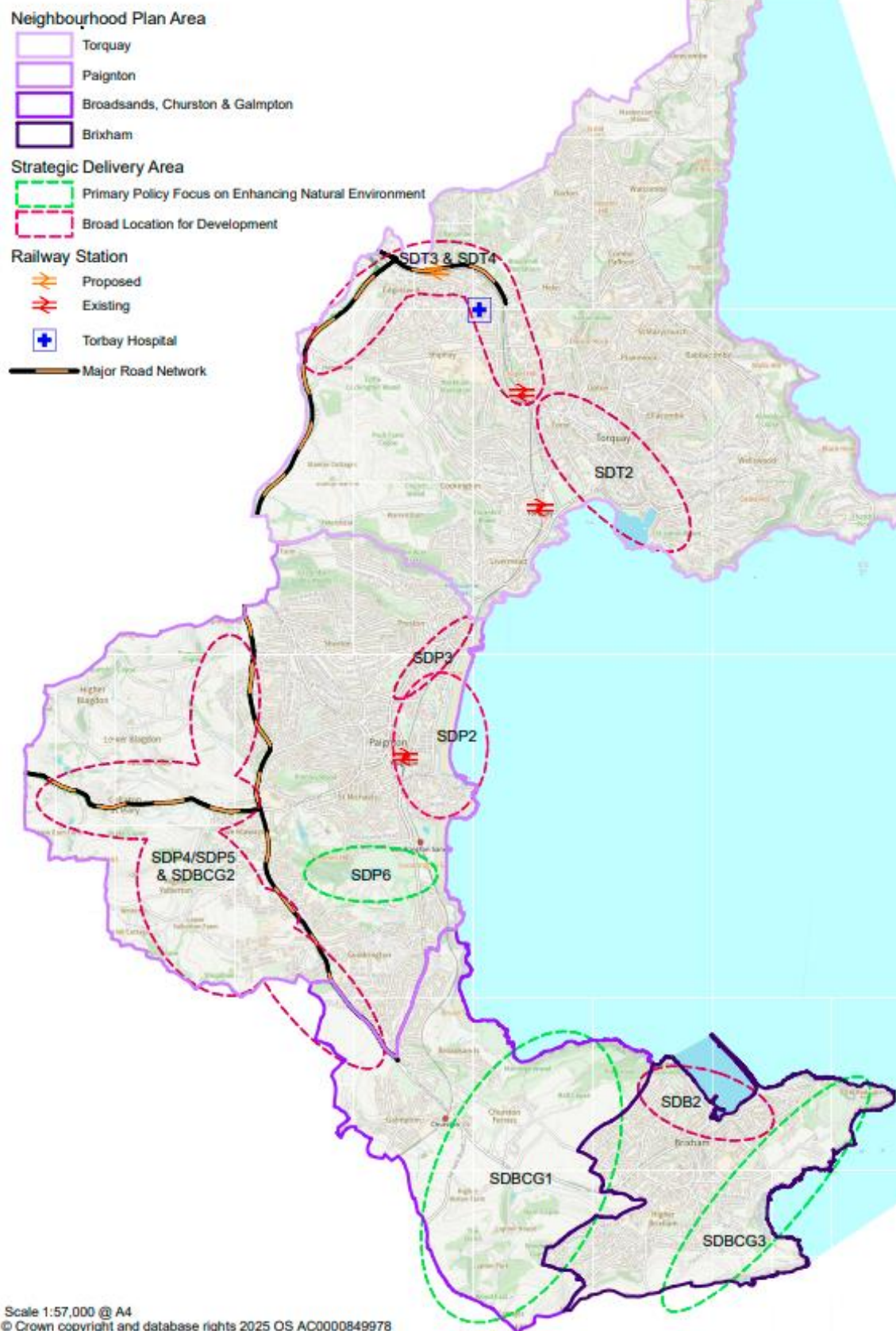


Figure 5 - Torbay Local Plan Key Diagram

Neighbourhood Plan Area Policies:

Torquay

Leading on Leisure and Lifestyle by the Sea

How future development will protect and enhance Torquay’s distinct identity and role, alongside valued lived, built and natural environments.



Figure 6 - Sustainable growth in Torquay

Strategic Policy SDT1: Torquay – A strategy for sustainable growth

Torquay will remain the primary commercial and healthcare centre of Torbay. Harbourside and town centre sites will be regenerated for appropriate mixed uses, including the provision of housing.

The urban areas will be improved and renewed, with strong support for family homes, where practicable. Uses that reinforce deprivation will be resisted.

Regeneration, comprehensive redevelopment, and large scale investment will ensure that the town centre and Torquay Harbour areas evolve as the principal town centre and the centrepiece of a modern, prosperous, and sustainable Torbay, whilst conserving or enhancing the historic and natural environment.

Torquay Gateway area to the northwest of Torquay is allocated for employment, housing, green infrastructure, and leisure provision. High quality developments will be sought, appropriate to their gateway setting, which respect and enhance the natural and built environment. The regionally important role of Torbay Hospital will be safeguarded.

Priority species such as Cirl Buntings and Greater Horseshoe Bats will be safeguarded.

All development will be required to adhere to the drainage hierarchy and minimise or reduce surface water draining into combined sewers, in order to safeguard the Marine Special Area of Conservation.

A strategic green gap between Torquay and Kingskerswell will be maintained.

Torquay will deliver a minimum of 37,000 square metres (net) of Class E(g), B1 or B2 employment floorspace and at least 3,600 new homes over the Plan period, equal to an average of around 180 dwellings a year over the Plan period 2022-42.

New Policy SDT1a Strategic Policy SDT1a: Torquay Town Centre the Heart of the English Riviera

Torquay Town Centre will be regenerated to maintain and enhance its role as the principal town in Torbay. The upper part of the town (from market Street) will provide significant new residential development opportunities including redevelopments at Union Square and Lower Union Lane. The Harbourside and Waterfront will deliver improved tourism and leisure facilities including on Stand (former Debenhams).

The value of designated and other heritage assets will be conserved and enhanced as key elements of regeneration schemes.

All development must contribute to climate change and flood resilience and reduce the amount of water draining into the Fleet and combined sewer.

Development should help to boost the area’s economic prosperity and reduce concentrations of deprivation. Development that reinforces deprivation will be revisited.

The area is expected to deliver:

- i) At least 1000 new homes of which 30% should be affordable
- ii) Enhanced and improved retail and commercial area focussed around the Harbourside , Waterfront and Fleet Steet providing a mix of shopping, leisure, employment and commercial activities as the principal town centre in Torbay.
- iii) New and enhanced leisure and tourism facilities including a hotel at Strand, and revitalisation of key heritage assets.

Community and Corporate Plan – Community and People, Pride in Place, Economic Growth

SDT1a Strategic Policy SDT1a: Torquay Town Centre the Heart of the English Riviera

Torquay Town Centre will be regenerated to maintain and enhance its role as the principal town in Torbay. The upper part of the town (from market Street) will provide significant new residential development opportunities including redevelopments at Union Square and Lower Union Lane. The Harbourside and Waterfront will deliver improved tourism and leisure facilities including on Stand (former Debenhams).

The value of designated and other heritage assets will be conserved and enhanced as key elements of regeneration schemes.

All development must contribute to climate change and flood resilience and reduce the amount of water draining into the Fleet and combined sewer.

Development should help to boost the area’s economic prprosperity and reduce concentrations of deprivation. Development that reinforces deprivation will be revisited.

The area is expected to deliver:

- i) At least 800 new homes of which 30% should be affordable

- ii) Enhanced and improved retail and commercial area focussed around the Harbourside , Waterfront and Fleet Steet providing a mix of shopping, leisure, employment and commercial activities as the Principal town centre in Torbay.
- iii) New and enhanced leisure and tourism facilities including a hotel at Strand, and revitalisation of key heritage assets.

Explanation

- 2.11 Torquay Town Centre and Harbour will be a focus for regeneration which supports its retail & commercial role. This means high quality development which improves the public realm and provides an improved, multifunctional town centre, including higher levels of residential development. Regeneration will achieve a leisure based retail offer at Torquay Harbour.
- 2.12 The lower part of the town is within Torquay Harbour Conservation Area and development will be expected to complement the area's historic character.
- 2.13 Several key sites offer considerable opportunities for regeneration many of which will be further identified through Town Visions and master planning. Particular opportunities exist at Union Square, Lower Union Lane, the Telephone Exchange and Temperance Street. The Local Plan supports all brownfield town centre development unless there are substantial reasons to resist development.

Strategic Policy SDT2: Torquay Gateway – A sustainable growth hub for homes, jobs and nature

Torquay Gateway (also referred to as Edginswell) is allocated as a Future Growth Area. High quality homes, employment, education and leisure facilities will be delivered in the Torquay Gateway to raise the economic prosperity of Torbay, and complement town centre regeneration and provide transport improvements serving the Bay.

The broad location is shown indicatively on the Key Diagram and on the Policies Map.

Development is expected to deliver:

- i) Around 400 550 new homes of which at least 30% should be affordable.
- ii) At least 10 serviced self-build housing plots.

- iii) A negotiated stopping place/~~transit site~~ for Travellers subject to a need being demonstrated.
- iv) Mixed use employment space, with at least 25% of the area provided as Class E(G), B2 or B8 employment.
- v) Improved sustainable transport infrastructure including a new train station at Edginswell and park and ride/transport hub at, or close to, Gallows Gate.
- vi) A landscape led design with integrated green infrastructure and biodiversity net gain. This could include increased provision for green burials.
- vii) Subject to an ongoing assessment of need, a new primary school in conjunction with the delivery of new housing within the Edginswell Valley

A high quality of design will be required to enhance the built and natural environment, strengthen the sense of arrival into Torbay, and protect the green gap between Torbay and Kingskerswell.

Design should include the provision of high quality joined up green infrastructure maximising cross boundary linkages and active travel opportunities where appropriate.

Proposals should achieve ecological mitigation and a 10% Biodiversity Net Gain which should be delivered on-site as far as possible. Where it is not possible to achieve this level of biodiversity net gain on site, off-site provision will be considered, with a first preference for biodiversity enhancements within the Gateway area.

Proposals must avoid significant effects on sites protected under European legislation, including those relating to Greater Horseshoe Bats and the Marine SAC. Particular attention should be given to loss of Greater Horseshoe Bat foraging and commuting habitats and Cirl Bunting habitat. Dark corridors for commuting bats should be provided and maintained throughout the landscape, particularly along the western buffer, in accordance with Policies NC1 to NC4.

Community and Corporate Plan – Community and People, Pride in Place, Economic Growth

Explanation

- 2.14 Torquay Gateway is an important area of growth for Torquay and has been rolled forward from the Torbay Local Plan 2012-30. The masterplan (adopted in 2016) will be updated.

- 2.15 In addition to providing new homes and jobs, there will be opportunities provided through strategic developments to improve connectivity for pedestrians, cyclists, public transport and motor vehicles within the area and to the town centre. The council is seeking to achieve a new train station at Edginswell to support growth in the area and provide an opportunity for sustainable transport including to Torbay Hospital.
- 2.16 The setting of Edginswell Hall and Village will be conserved or enhanced. The effective provision of green infrastructure will be provided as part of the development to improve the accessibility of greenspace in the area, improve connections between communities, manage flood risk (particularly minimising run-off into Aller Brook) and maintain and enhance a strategic green gap between Torquay and Kingskerswell. The area could provide additional green burial opportunities as part its landscape and recreation provision.
- 2.17 Care should be taken for development to avoid impact on the gas main running through the Future Growth Area.

Strategic Policy SDT3: Newton Road to Torre Gateway – A regeneration corridor for homes, jobs, health and connectivity

The regeneration of brownfield sites within the broad corridor between Edginswell and Torre, shown indicatively on the key diagram and policies map, will be supported to achieve:

- i) The safeguarding of Torbay Hospital as a key healthcare facility. Support for upgraded and improved healthcare facilities and key worker accommodation at Torbay Hospital to support its role as a sub regionally important healthcare facility.
- ii) The improvement and modernisation of employment facilities whilst rationalising outdated space.
- iii) The provision of around 500 dwellings over the Plan period including affordable homes in accordance with Policy H7.
- iv) The provision of water sensitive urban design and sustainable drainage.
- v) The improvement of facilities for active travel and coordinated public transport including the provision of improved integration of sustainable transport at Torre Station and delivery of a new railway station at Edginswell.

Explanation

- 2.18 SDT3 Newton Road to Torre Regeneration Corridor policy outlines a strategic vision for revitalising a key area in Torquay, with a focus on sustainable development and infrastructure improvement. It seeks to establish a regeneration corridor into Torbay Town Centre along key sustainable travel hubs and to maximise the use of available urban land, including at Torre Station. Proposals will be master planned to provide strong and coordinated active travel linkages between Torre Station, Edginswell Station, the Town Centre and other key destinations such as Shiphay Lane, Torbay Hospital and local employment hubs.
- 2.19 The Torquay Gateway (Edginswell) Masterplan will be expanded to set out proposals for both Edginswell and the Newton Road to Torre regeneration corridor. There is scope for enhanced waiting areas, cycling parking and employment facilities, as well as a significant increase in residential development at Torre Station.
- 2.20 There are opportunities for brownfield housing in this corridor. It will be important to safeguard and improve prospects for employment: however there is scope to make better use of employment land in the area.

Paignton

Family fun on the foreshore and a centre for enterprise, electronics and entrepreneurship

How future development will protect and enhance Paignton’s distinct identity and role, alongside valued lived, built and natural environments.



Figure 7 - Sustainable growth in Paignton

Strategic Policy SDP1: Paignton – A strategy for sustainable growth

Paignton will be rejuvenated through high-quality mixed-use development of key town centre, harbour, and waterfront sites. Improvement of the built environment will re-capture the historic character of the old town and appeal of the 19th Century ‘Garden Suburb’ to the east. Green infrastructure will underpin both recreational and flood-resilience measures, including a new sea wall. Residential uses will be supported in the town centre, subject to being safe for their lifetime, including from flooding and climate change risk. Uses that reinforce deprivation in and around the town centre will be resisted.

The area around of Preston District Centre will be regenerated to make best use of underutilised brownfield land for housing, whilst maintaining the areas retail tourism, leisure functions.

The role of Goodrington as a leisure and employment hub will be promoted and enhanced, whilst protecting the area’s environmental assets and providing resilience to climate change. Extended train services to Goodrington will be supported.

The completion of housing at Great Parks and Development of the Future Growth Area to the west of Paignton will be delivered ~~through master planning~~ to provide employment and family housing opportunities. This will be underpinned by enhanced transport infrastructure, and sustainable transport opportunities along the Western Corridor and A385 Totnes Road and will take account of environmental sensitivity through a green infrastructure led design approach. Landscaping, biodiversity, and flood risk management measures will be needed to minimise the environmental impact of development, particularly cross-boundary impacts.

Priority species such as Greater Horseshoe Bats and Cirl Buntings and their habitats will be safeguarded, and any impacts mitigated.

Paignton will provide a minimum of 37,000 square metres (net) of Class E(g), B2 or B8 employment floor space, and at least 3,400 new homes, equal to an average of around 170 dwellings a year over the Plan period 2022-42.

Community and Corporate Plan – Community and People, Pride in Place, Economic Growth

Explanation

- 2.21 Paignton is the second largest town in Torbay, with a medieval core, C19th “Garden Suburb” east of the railway, and significant C20th residential suburbs. It includes the district centre of Preston.
- 2.22 There will be significant regeneration of Paignton town centre, harbour and waterfront areas to enhance its role as a tourism destination and provide an improved retail function. Rejuvenation of the town, including its historic core, will be achieved via masterplanning, major investment and new development. Improved links within the town centre, upgrading the transport hub in the town centre, and connections to other parts of the Bay will be encouraged. Policy SDP2 deals with Paignton Town Centre in more detail. Regard should be had to the conservation or enhancement of the built, natural and historic environment, in accordance with other policies in this plan.

- 2.23 The cluster of sites to the north and west of Paignton will continue to be a key focus for urban expansion as a Future Growth Area, as well as the completion of previously allocated sites at Great Parks. New housing and mixed use developments promoted to provide a range of residential, employment, of sites. These will require a high quality of design and appropriate landscaping to protect and enhance the rural backdrop to the area and should include the delivery of green infrastructure assets which provide multiple functions and benefits. On-line improvements and provision of active travel and public transport facilities will be required to minimise congestion on the Western Corridor. These will need to be accompanied by measures to encourage modal shift away from car use in order to manage demand on the road network.

Strategic Policy SDP2: Revitalising Paignton Town Centre and Waterfront - A destination for living, tourism and leisure

Paignton Town Centre will be regenerated in order to bring about improvements to its economy, historic, built and natural environment. The connectivity of the Town Centre to the Waterfront and surrounding areas will be restored and improved, including through the provision of a “Paignton Gateway” sustainable transport hub around Paignton train and bus stations. New developments will complement the area’s historic character, rejuvenating Paignton as a popular tourist destination, a modern Town Centre to support the needs of the local residents and tourists. New residential development will be supported subject to heritage and flooding considerations.

Development must be resilient to the effects of climate change including sea level rise and contribute towards reducing flood risk. Sleeping accommodation in basements will not be allowed in areas at risk of flooding. A new sea wall is proposed on Paignton and Preston seafront.

The tourism role of The Esplanade and Harbour Core Tourism Investment Area will be enhanced and supported. A flexible approach will be taken to allowing residential use of holiday accommodation outside of the CTIA, in order to boost housing supply arising from former holiday accommodation. The introduction of Houses in multiple occupation will be resisted in these areas.

Explanation

- 2.24 Paignton Town Centre will remain a focus for commercial and tourism activity. The Centre will be regenerated to strengthen and update its offer for businesses, tourists and residents. This will incorporate improved public space to help re-establish the formerly distinctive grid pattern of Paignton, linked to the regeneration of major development sites, connecting the medieval town with the Victorian garden suburb. Upgraded transport hub and facilities for travellers is supported around Paignton train and bus stations with measures to support modal shifts to sustainable transport and connectivity.
- 2.25 The boundaries of the retail core and Core Tourism Investment Area will be drawn back to encourage residential led regeneration, whilst improving the provision of modern purpose-built holiday accommodation on the Esplanade. Policy TO1 deals with Core Tourism Investment Areas. Policies TC1 and TC4 deal with town centre retail, including primary and secondary shopping areas.
- 2.26 It is critical that flood defence works are put in place to address the effects of climate change in the form of the Paignton and Preston Promenade Coastal Flood Protection Scheme. **Paignton and Preston Promenade coastal flood protection scheme - Torbay Council**. Despite its vulnerability to flooding, Paignton Town Centre is a highly sustainable location for development and is well served by public transport. It is therefore sequentially preferable to other out of town locations as a focus for development. In some instances, an exceptions test will be required to support town centre development. All development must meet the requirements of site flood risk assessments and be safe for its lifetime. Development will need to avoid flood vulnerable uses in high-risk areas; in particular, basement flats will not be permitted in areas at risk of flooding.
- 2.27 There are several significant sites in Paignton Town Centre that provide an opportunity for residential led regeneration. It will be important to make the best use of urban land and to encourage tall buildings as far as possible to maximise value and gain sea views. These include Crossways, Station Lane, Station Square and nearby buildings, and Victoria Square.

Strategic Policy SDP3: Preston – A thriving district centre and Regeneration Hub for living and community

A regeneration hub around Preston District centre is shown on the Policies map and indicatively on the key diagram. The role of Preston as a district centre serving local needs should be safeguarded but marginal areas of the District Centre will be released for residential redevelopment. Regeneration of suitable brownfield land,

including under-utilised employment space will be supported, including the provision of taller buildings subject to design and amenity considerations. The area is expected to provide at least 150 additional dwellings over the Plan period.

Opportunities to improve active travel and public transport facilities, and safe links to Torquay and Paignton train stations should be maximised.

Development should enhance the natural environment and support improvements to public open space at Hollicombe Park and Oldway Mansion and provide sustainable drainage and water sensitive urban design.;

Community and Corporate Plan – Community and People, Pride in Place, Economic Growth

Explanation

- 2.28 The Local Plan supports new housing on brownfield sites in principle, subject to other considerations such as heritage and flooding. The Plan identifies particular brownfield regeneration opportunities in the vicinity of Preston District Centre, Paignton. This includes allowing more flexibility for residential development in the marginal parts of the District Centre and making better use of land within easy walking and wheeling distance of the A3022 traffic corridor. Support will be given to taller buildings subject to amenity and design considerations.
- 2.29 Public Open space at Hollicombe Park and Oldway Mansion will be protected. The need to find an economic use for Oldway Mansion will be considered and could include reactivating previously approved residential proposals, subject to heritage and open space considerations.
- 2.30 It is noted that parts of Preston are sandstone, and development will need to have regard to ground conditions.

Strategic Policy SDP4: Collaton St Mary – Sustainable growth in a connected village

Collaton St Mary is allocated as a Future Growth Area, primarily focussed on new homes. The broad location is shown indicatively on the Key Diagram and on the Policies Map.

Development is expected to deliver:

- i) Around 600 new homes, including at least 30% affordable housing
- ii) At least 12 serviced plots for self-build housing

- iii) A transit pitch / stopping place for travellers
- iv) Improved community facilities and strengthened village centre focussed on the east of the Future Growth Area
- v) Any retail (or other Class E/F1 uses) should be limited to meeting neighbourhood needs and no retail use of more than 500 SQ M (net) will be permitted
- vi) Improved sustainable transport routes including bus and cycling facilities along the A385 Corridor
- vii) Improved drainage and sewerage infrastructure
- viii) Conservation and enhancement of the area's heritage, including listed buildings.

Development should be accompanied by upgraded transport infrastructure. This should include including improved walking, wheeling, cycling and bus routes and facilities along the A385 Totnes Road, and junction improvements at the junction of Stoke Road/Totnes Road. Development will need to contribute towards sewer and drainage infrastructure, including protection of the Water Meadow and watercourses from urban creep. Proposals must ensure that down-stream settlements are not put at increased risk of flooding.

Development in these locations should provide resilience to the effects of climate change, particularly through the provision of high quality joined up green infrastructure maximising cross boundary linkages and active travel opportunities where appropriate.

Proposals should achieve a 10% Biodiversity Net Gain which should be delivered on-site as far as possible. Where it is not possible to achieve this level of biodiversity net gain on site, off-site provision will be considered, with a first preference for biodiversity enhancements within the Collaton St Mary area.

Proposals must avoid significant effects on European Wildlife Sites, including those relating to Greater Horseshoe Bats and the Marine SAC. Particular attention should be given to loss of Greater Horseshoe Bat foraging and commuting habitats and Cirl Bunting habitat. Dark corridors for commuting bats should be provided and maintained throughout the landscape in accordance with Policy NC1.

Explanation

- 2.31 The west of Paignton offers the largest area of land for expansion within Torbay, although there are infrastructure requirements that need to be met prior to or in parallel with major development. Sites allocated at Great Parks, Collaton St Mary, Yalberton, and White Rock will continue to be allocated, and the Local Plan expands on these areas as the least damaging option for greenfield expansion. The South of the wider growth area at Inglewood falls within the Broadsands Churston and Galmpton Neighbourhood Plan area
- 2.32 Development is dependent upon a vision led approach to improve reduce dependence upon private cars using the A3022 Western Corridor. Improvement works to Kings Ash and Tweenaway Cross have taken place during the previous Local Plan (2012-30) but scope and funding for further road improvements is likely to be limited, and therefore demand management and support of walking, wheeling, cycling and public transport infrastructure will be important to support successful development.
- 2.33 The A385 Totnes Road needs a comprehensive approach to reduce existing congestion and minimise the number of new accesses onto it. The Local Transport Plan 4 2025-30 note that sustainable transport will be prioritised in order to unlock growth. Development should provide new, segregated and continuous walking, wheeling and cycling route, physically separated from traffic, alongside high-quality bus provision and transport demand management.
- 2.34 The wider corridor is well served in relation to retail, schools and employment, but connectivity between the different growth area is somewhat disjointed. Improved permeability between development areas is needed and will be given a high priority in masterplanning of the area.
- 2.35 Improved sewerage infrastructure will be needed to connect development to the waste water treatment works at the West of Paignton.
- 2.36 An update to the current Masterplan (adopted 2016) is need to support additional development at Collaton St Mary. The 2016 Masterplan proposes about 460 dwellings which remain proposed for development where not yet built (at 2025 some are under construction). At least 150 additional dwellings are expected to be provided beyond the boundaries of the 2016 Masterplan.
- 2.37 Developments should seek to achieve better access to the countryside south and west of the developed area, providing recreation, landscaping and biodiversity value and provision of green infrastructure including allotments. For example redevelopments in the area should consider opportunities for habitat enhancements, such as planting to provide bat and wildlife links through the area.

Strategic Policy SDP5: Long Road, Yalberton - Sustainable living and employment neighbourhood

Land to the west of South Devon College and south of Berry Acres is allocated as a Future Growth Area delivering a mix of new homes and employment land. The broad location is shown indicatively on the Key Diagram and on the Policies Map.

Development is expected to deliver:

- i) An additional 650 dwellings, including at least 30% affordable housing.
- ii) At least 12 serviced plots for self-build housing.
- iii) Provision of a negotiated stopping place for travellers or provision of an alternative site.
- iv) 25% of the area to be Class E(g), B2 or B8 employment delivering at least 20,000 sq m of industrial development. Land allocated for industrial development will be safeguarded for such purpose.
- v) The role of South Devon College will be supported and enhanced as an key facility serving a wider strategic education, training, employment and community role.
- vi) Designate Devonshire Park retail centre as a District Centre, subject to improvements to active travel to and from the site. Outside of this, new retail provision in the area should be located in the local centres and strictly of a scale to meet local needs (around 500 sq. m maximum).
- vii) Yalberton Household Waste and Recycling Centre and Yalberton Quarry will be safeguarded for municipal waste and associated purposes and should not be sterilised from operation by nearby developments.
- viii) Strategic landscaping and open space to protect the highest parts of the landscape and rural setting of Higher and Lower Yalberton.
- ix) Yalberton Valley including Lower and Higher Yalberton will be protected for its biodiversity and to conserve and enhance its local historic environment.

Development must be accompanied by upgraded walking, wheeling, cycling and sustainable transport infrastructure, within the Future Growth Area and along the Western Corridor to provide greater permeability within the area and better sustainable transport linkages to Paignton town centre. Development will be supported by and improvements to sewerage capacity

Development in these locations should provide resilience to the effects of climate change, particularly through the provision of high quality joined up green infrastructure maximising cross boundary linkages and active travel opportunities where appropriate.

Proposals should achieve a 10% Biodiversity Net Gain which should be delivered on-site as far as possible. Where it is not possible to achieve this level of biodiversity net gain on site, off-site provision will be considered, with a first preference for biodiversity enhancements within the Long Road, Yalberton area.

Proposals must avoid significant effects on European Wildlife Sites, including those relating to Greater Horseshoe Bats and the Marine SAC. Particular attention should be given to loss of Greater Horseshoe Bat foraging and commuting habitats and Cirl Bunting habitat. Dark corridors for commuting bats should be provided and maintained throughout the landscape in accordance with Policy NC1.

Community and Corporate Plan – Community and People, Pride in Place, Economic Growth

Explanation

- 2.38 This area includes the Local Plan 2012-30 Future Growth Areas of Bery Acres, Yalberton (Wilkins Drive) and White Rock. The south of the area being built out at Inglewood is within the Broadsands Churston and Galmpton Neighbourhood Area but functionally relates to the developments on the West of Paignton. The Plan proposes further areas to those allocated in the previous local plan or with planning permission. These should deliver at least 200 additional dwellings beyond the number previously proposed at Berry Acres and Devonshire Park in the Torbay Local Plan 2012-30.
- 2.39 At least 20,000 sq m of employment land beyond that allocated in the previous Local Plan should be provided. It is important that employment land in the area is safeguarded for such use, or sufficient financial contribution made as a site deliverability matter to unlock the provision of nearby sites such as Claylands Phase 2. South Devon College, Epic and a range of other businesses in the area form part of Torbay's "high tech hub and supporting the expansion and safeguarding these is an important Plan objective. Improvements and expansion of South Devon College, including provision of an energy centre / sustainable construction centre and similar facilities are a vital economic, social and cultural asset to the bay. The role of Yalberton and Yalberton Quarry will be safeguarded for waste purposes, and residential uses should not encroach on these, where this could introduce amenity conflicts.

- 2.40 Detailed proposals for area will come forward through a new Masterplan for the area. The Yalberton Valley to the West of the Future Growth Area contains areas of landscape, ecological and heritage importance, including several listed buildings. It is important that a strategic landscape buffer and traffic management is put in place to protect the character and integrity of this area and its designated heritage assets.

Policy SDP6: Clennon Valley - Active leisure and nature hub

Developments within the Clennon Valley Leisure Hub will comprise a mix of recreation, active travel and green infrastructure uses and deliver improvements to the recreation and tourism offer, providing safe, continuous and accessible walking, wheeling and cycling routes, and a landscape-led green corridor. whilst enhancing green infrastructure, walking, wheeling and cycling, and biodiversity in the area.

Development will comprise a landscape and green infrastructure-led design approach to ensure the conservation of a strategic green corridor linking Goodrington's beaches with the top of the valley and nearby holiday accommodation and parks. Development in this sensitive location should provide resilience and adaptation to the effects of climate change and safeguard or enhance the integrity of important wildlife sites and features, including the local water features and ecology and the wider South Hams SAC and Marine SAC.

Community and Corporate Plan – Pride in Place

Explanation

- 2.41 Clennon Valley is an important recreation, leisure and tourism destination for the whole Bay. It provides a good opportunity for expanded sports and recreation provision. Tourism uses, including water-based activities and holiday accommodation, are appropriate to this location. Seafront development should provide opportunities to improve permeability and public access to the beach and be of the highest quality reflecting the area's important natural setting.
- 2.42 Proposals should promote pedestrian and green links west-east, connecting South Devon College, Paignton Community College, Paignton Zoo, Long Road South Business Park and the wider countryside to Quaywest, Goodrington Sands and the sea.

- 2.43 Development should incorporate and contribute towards flood alleviation and sea defence measures to provide resilience to climate change, using sustainable drainage methods wherever practicable. Flood vulnerable uses will be directed to areas of no/low flood risk.
- 2.44 The integrity of the green valley that connects the open countryside with the sea should be conserved and enhanced. Any built development should be located and designed to conserve this important natural corridor and respect its natural setting.

Please note that Policy SDBCG2 Land at Inglewood and its environs north of Windy Corner could also fit within this section of the Plan but is included within the BCG Village part of the Plan to reflect the Neighbourhood Plan Forum arrangements for the area.

Brixham

A colourful collision of creativity, craft, food and fishing

How future development will protect and enhance Brixham’s distinct identity and role, alongside valued lived, built and natural environments.

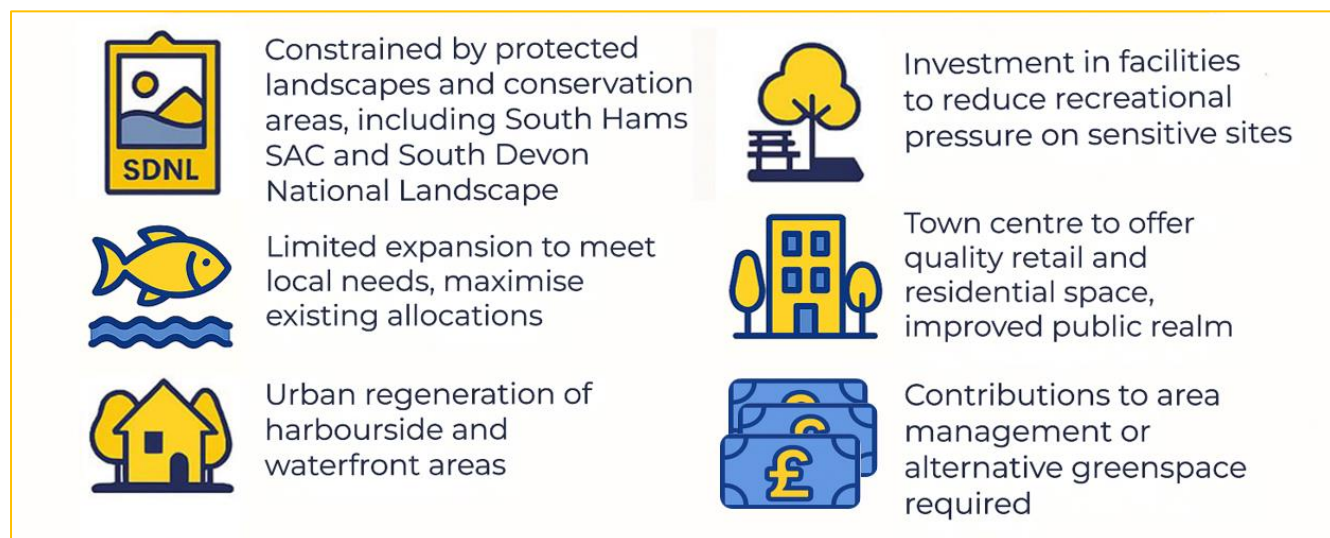


Figure 8 - Sustainable growth in Brixham

Strategic Policy SDB1: Brixham – A strategy for sustainable growth

Brixham will accommodate appropriate but limited new growth aimed at regenerating the town centre and built-up area, to sustain a viable town centre retail function, maintain an appropriate range of community facilities and meet local housing and employment needs.

Brixham’s role as a fishing port and resort, with a nationally important and historic working and creative harbour, will be enhanced.

New maritime facilities including improved water-borne transport, employment space, and facilities to support the fishing industry including a Northern Arm Breakwater are proposed, subject to the area’s important natural and marine environment being safeguarded and enhanced.

Brixham will deliver around 5,000 square metres of employment floorspace and at least 400 dwellings over the Plan period, equal to around 20 dwellings a year, aimed at meeting the needs of local people.

Development is expected to conserve or enhance the local historic environment

The National Landscape and its setting will be conserved and enhanced to protect its intrinsic landscape and biodiversity value, and for recreational and tourism purposes. Major development will not be permitted within the South Devon National Landscape, unless brought forward through a neighbourhood plans, and is shown to be in the public interest.

Development in Brixham will only be acceptable if it can be accommodated without prejudicing the integrity of the South Devon National Landscape, and South Hams Special Area of Conservation. Development should be resilient to flood risk and the effects of climate change.

Community and Corporate Plan – Community and People, Pride in Place, Economic Growth

Explanation

- 2.45 This policy relates to the “parished” town of Brixham, i.e. the Brixham Town Council area. Brixham is bounded by the South Devon National Landscape (formerly AONB) which constrains its outward expansion. The area around Berry Head is a Special Area of Conservation, which is an international important wildlife designation. The coast is also bounded by the marine SAC designated for its reef and sea cave habitat. These constraints make it difficult for Brixham to meet its need for housing and other facilities, and some limited development will need to be accommodated within the adjoining BGC Villages area. It is important that this be limited to meeting local needs and that Brixham meets as much of its needs as possible.
- 2.46 It will be important that longstanding development allocations such as Northcliffe Hotel, Middle Street Car Park, Paint Station and former St Mary’s dairy are built out and residential opportunities maximised.
- 2.47 There is scope for further urban regeneration within the harbourside and waterfront areas of Brixham. Land at Freshwater Quarry and Oxen Cove, and adjacent to the Fishmarket will provide employment space to support and improve maritime industries. The Northern Arm Breakwater has featured in previous Plans and continues to be allocated, subject to

an Environmental Impact assessment and Habitats Regulations Appropriate Assessment. However additional floorspace can also be created within existing harbour land in the shorter term.

- 2.48 The tourism and leisure economy will be developed in a way that respects the towns rich historic and environmental character.
- 2.49 The appropriated investment in facilities such as Battery Gardens, Shoalstone Pool, Breakwater Beach and WW2 Hard, and Brixham Museum will be supported where these would enhance the conservation value and, in particular, provide an alternative to reduce recreational pressure on Berry Head.

Strategic Policy SDB2: Revitalising Brixham's Town Centre, Harbour and Waterfront - A destination for living, maritime activity and tourism

Mixed use regeneration is proposed in the Brixham Town Centre, Harbour, and waterfront areas, to provide a range of retail, employment, leisure, and residential facilities appropriate to the scale of the town. The purpose of this development is to meet local needs, to sustain Brixham's role as a vibrant maritime resort, to support and develop traditional industries and diversify the economic base. The provision of a Northern Arm Breakwater is proposed subject to the outcome of an Environmental Impact assessment and Habitats Regulations Appropriate Assessment.

Residential development above commercial

Proposals for residential above commercial will be encouraged and supported, subject to amenity considerations and safeguarding the role of the working harbour and fish processing activities.

Development must take flood risk and water management into account, and make sustainable drainage, flood risk mitigation and resilience measures central to the design of development.

Any proposals that may lead to likely significant effects on sites protected under European legislation will only be permitted where no adverse effect on the integrity of the site can be shown.

Explanation

- 2.50 Brixham Town Centre will continue to provide local needs and quality ground floor retail facilities with residential or commercial above. This will include the redevelopment of the car park at Middle Street, to provide commercial space, car parking to serve the town, residential units and improved public realm. The scheme will create a high quality and vibrant public realm.
- 2.51 The harbour area will have improved sustainable transport links to reduce the need to travel by car. There will be improved walking, wheeling and cycling facilities to increase the permeability of the town centre and provide a high class working and recreational environment for residents and tourists.

Strategic Policy SDB3: Berry Head to Sharkham Point - Coastal conservation and recreation management

The Berry Head to Sharkham Point Special Area will be conserved and enhanced to protect its landscape and biodiversity value. Development will only be permitted within the area where it is shown to enhance the area's environmental or landscape value and does not prejudice the integrity of the South Devon National Landscape, and South Hams Special Area of Conservation.

Should existing uses, including holiday parks in the SDNL cease to operate, there will be an expectation that they should revert to open countryside.

Explanation

- 2.52 The Policies Map shows a 'Berry Head Special Area' covering the country park and adjoining area. This is shown to clarify the range of designations lying within it including National Landscape and Special Area of Conservation. This area is the most environmentally sensitive, and peripheral part of Torbay.
- 2.53 There is existing tourism development and a need to balance competing pressures for tourism and recreation with safeguarding the internationally important environmental

assets, and reducing existing degradation on the SAC including through recreation impacts. The area therefore needs careful management. Development within an 8km zone of influence will be required to contribute to improved management or the provision of suitable alternative natural greenspace (SANG).

- 2.54 Development that may have an adverse effect on the landscape and scenic beauty of the area, or encroach further upon the area's special characteristics, will be considered to constitute major development and only be approved if clearly demonstrated to be in the public interest.

Brixham Peninsula and Rural Villages

Rural hinterland to Brixham, valued landscapes and biodiversity, green farmland and villages rich in history

How future development will protect and enhance the Brixham Peninsula and Rural Villages' distinct identity and role, alongside valued lived, built and natural environments.

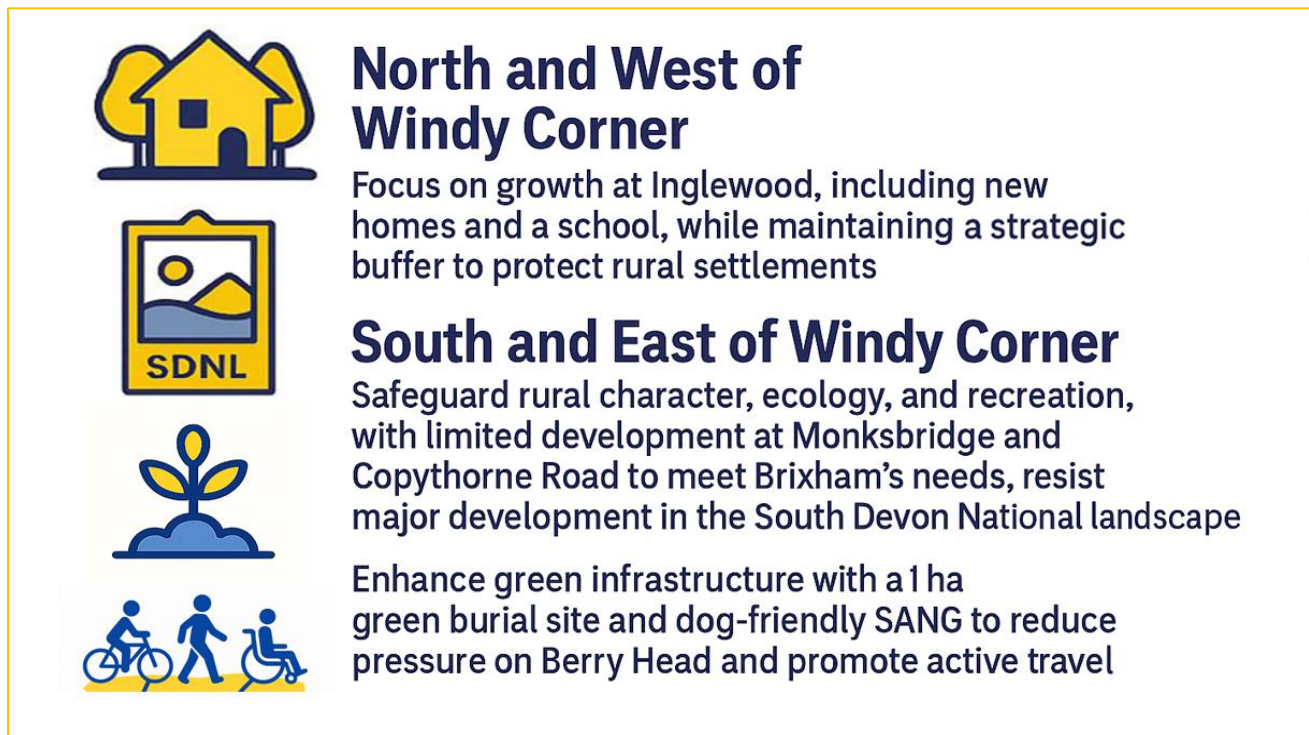


Figure 9 - Sustainable Growth in Brixham Peninsula and Rural Villages

Broadsands Churston and Galmpton (BCG Villages)

Strategic Policy SDBCG1: Broadsands, Churston and Galmpton Villages - Sustainable living and landscape protection strategy

North and West of Windy Corner

The focus of growth in the Broadsands Churston Galmpton Villages (BCG villages) Neighbourhood Plan area will be on the approved site at Inglewood and land to the

North of Windy Corner (SDBCG2). This will include the provision of new homes and delivery of a school site on the Inglewood development, as shown on the Policies map.

A strategic buffer between Inglewood and Churston, Galmpton and Broadsands, will be maintained to safeguard the landscape character, ecological integrity, recreational and economic value of the rural settlements to the south and east of Windy Corner (SDBCG3).

South and East of Windy Corner

The focus of the plan to the south and east of Windy Corner (SDBCG3) will be to safeguard the area's rural character, landscape, ecology, environmental and recreational value whilst strengthening settlement gaps and improved provision of green infrastructure.

A park and ride site (transportation hub) serving Brixham is proposed, subject to assessment of landscape, ecological and transport impacts.

Major development in the South Devon National Landscape will be resisted.

The Overall BCG Villages Area

The BCG area will provide appropriate green infrastructure including a 1ha green burial site, a nature reserve and dog-friendly recreation area and facilities to reduce recreational pressure on Berry Head and maximise active travel opportunities.

Community and Corporate Plan – Community and People, Pride in Place

Explanation

- 2.55 The area between the south and west of Paignton and the North of Brixham is covered by the Broadsands Churston and Galmpton Villages Neighbourhood Forum Area (BCG Villages). This area was formerly part of the Brixham Peninsula Neighbourhood Plan (adopted June 2019) and forms the rural hinterland to Brixham.
- 2.56 The BCG area broadly falls into two halves. The area to the north of Windy Corner junction and containing the Inglewood development area and relates functionally to the developed area of White Rock and the west of Paignton. Policy SDBCG2 sets out considerations for this area.
- 2.57 Windy Corner marks where the “Western Corridor” (A3022) rejoins the Torbay Coast Road (A379). The junction is located within Common Land and is operating at above capacity,

although recent junction improvements have improved capacity somewhat. Despite efforts over many decades, no solution, or funding, has been identified to overcome this bottleneck. Measures within the Local Plan will manage demand for use of the road and promote better conditions for walking, wheeling, cycling and public transport. There is potential for limited rail accessibility to Galmpton via the Paignton to Dartmouth Steam Railway. However, this is primarily a leisure route and not suitable or operated for commuter travel.

- 2.58 The land to the south of Windy Corner contains Galmpton Common, The South Devon National Landscape, Greater Horseshoe Bat sustenance and landscape connectivity zone, as well as conservation areas covering the rural villages of Churston Ferrers and Galmpton. This area is therefore environmentally constrained as well as relatively inaccessible. Policy SDBCG3 deals with the Rural Villages South of Windy Corner, with a focus on conserving the area's rural character. Nevertheless, some limited development is proposed on the boundary with Brixham in order to meet the town's local needs. Other major development in the National Landscape will be resisted.
- 2.59 The BCG area will provide important green infrastructure which is essential to supporting other development in Torbay. This includes areas for nature conservation and new and enhanced recreation and dog-friendly facilities to mitigate development pressure on the South Hams SAC. Whilst a single Suitable Alternative Natural Greenspace (SANG) would be supported, it is more likely that a range of facilities will be provided including dog recreation areas. Developer contributions will be sought towards providing these as a "site deliverability matter" as set out in Chapter 9. Cemetery space (but no crematoria) will also be provided in the BCG area, potentially sharing parking and ceremony space in conjunction with the proposed mobility hub in Policy TAS.

Strategic Policy SDBCG2 Land at Inglewood and its environs north of Windy Corner

Development in the north of the BCG Area will focus upon the approved development at Inglewood with some expansion into adjoining areas, as shown on the Policies Map. Sustainable transport and other functional links with the White Rock area and Paignton will be strengthened and improved.

Development in the SDBCG2 Area should achieve the following:

- i) A minimum of 450 dwellings over the Plan period (focussed at Inglewood and the adjoining area within the H2P4 Future growth Area).**

- ii) At least 30% affordable housing on sites within the built-up area or areas proposed for development.
- iii) The provision of a school and playing pitch.
- iv) At least 500 sq. m of employment land within Class E(G), B2 or B8.
- v) Maintenance and enhancements to public open space, including recreation facilities appropriate to the location, and enhancement of countryside access.
- vi) The retention and enhancement of a green landscape buffer between Inglewood and Whiterock to the north, Galmpton to the South and the National Landscape to the South and West.

Development in these locations should provide resilience to the effects of climate change, particularly through the provision of high quality joined up green infrastructure maximising cross boundary linkages and active travel opportunities where appropriate.

Proposals should achieve a 10% Biodiversity Net Gain which should be delivered on-site as far as possible. Where it is not possible to achieve this level of biodiversity net gain on site, off-site provision will be considered, with a first preference for biodiversity enhancements within the BCG Villages area.

Proposals must avoid significant effects on European Wildlife Sites, including those relating to Greater Horseshoe Bats and the Marine SAC. Particular attention should be given to:

- Avoiding the loss of Greater Horseshoe Bat foraging and commuting habitats and Cirl Bunting habitat. Dark corridors for commuting bats should be provided and maintained throughout the landscape in accordance with Policy NC1.
- Avoiding additional recreational Impacts on the Berry Head calcareous grassland.
- Cirl Bunting habitat should also be protected and enhanced.

Community and Corporate Plan – Community and People, Pride in Place, Economic Growth

Explanation

- 2.60 Policy SDBCG2 deals with land to the north of Windy Corner. The bulk of the area is covered by the Inglewood development (under construction in 2025). Additional

development opportunities in the Inglewood Area are shown on the Policies Map. The areas should provide for a school as shown on the Inglewood Masterplan (and Legal Agreement to application P/2017/1133 and varied by P/2023/0377). If not required for primary purposes, it should be retained for other education requirements.

- 2.61 The area is expected to provide around 600 dwellings and 500 sq m of employment land over the Plan period in the area within Torbay.
- 2.62 Land to the west of Waddeton Road is within South Hams and may be promoted for development to the neighbour authority. It will be important for joint working and agreement on cross-boundary matters. In addition, some ecological mitigation and agricultural mitigation land for development at Inglewood is located within the South Hams. This relates to mitigation of impacts on the South Hams Special Area of Conservation (greater horseshoe bat sustenance zone and other ecological mitigation), so it will be a matter of Habitats Regulations compliance to ensure that sufficient mitigation is provided to offset the impact of the Inglewood development. The land is also within the setting of the South Devon National Landscape (former AONB), and a high-quality landscape led design to any further development will be needed to minimise additional impact on the National Landscape.
- 2.63 The south of the SDBCG2 area is closer to the National Landscape and the village Galmpton. A green buffer between Inglewood and Galmpton should be maintained to provide a settlement gap and prevent coalescence of Paignton's southwards development with Galmpton. The area would be suitable for a green burial site and associated facilities to meet Torbay's need for cemeteries. This should help reinforce the undeveloped settlement gap.

Policy SDBCG3: Rural villages south of Windy Corner – Landscape, ecology and settlement gap protection zone

Development to the South of Windy Corner will focus upon protecting the area's significant landscape, environmental, historic and agricultural character, whilst providing sufficient development to meet the local needs.

The BCG3 area is expected to provide around 80 dwellings, mainly at Copythorne Road and 500 sq m of employment space within Class E(G) , B2 or B8. The BCG3 area should also provide a dog friendly natural green spaces with recreation and leisure facilities appropriate to the area's rural setting, to provide an alternative to Berry Head.

The area will also provide a park and ride facility serving Brixham, ideally forming a recreational transport hub within safe and easy onward mobility opportunities, including the provision of walking, wheeling and cycling routes.

The South Devon National Landscape and its setting will be conserved and enhanced to protect its intrinsic landscape and biodiversity value.

Major development will not be permitted within the National Landscape unless brought forward through a Development Plan, and shown to be in the public interest. Non-major development in the National Landscape will only be allowed as a rural exception to provide affordable housing for local people.

Proposals should achieve a 10% Biodiversity Net Gain which should be delivered on-site as far as possible. Where it is not possible to achieve this level of biodiversity net gain on site, off-site provision will be considered, with a first preference for biodiversity enhancements within the SDBCG3 area.

All development in this sensitive location should adhere to planning guidance for Greater Horseshoe Bats within the South Hams SAC. All development should provide adequate mitigation that ensures:

- i) there are no further restrictions on potential movement of Greater Horseshoe Bats through the area; and
- ii) the retention and enhancement of foraging and on-site roosting opportunities
- iii) existing green infrastructure assets, trees, hedgerows, and connectivity between individual assets are safeguarded or enhanced
- iv) no increase in lighting in bat flyways to greater than 0.5 lux; and
- v) Mitigation of the impact of additional recreational pressure on the Marine SAC and South Hams SAC.

Any proposals that may lead to likely significant effects on sites protected under European legislation will only be permitted where no adverse effect (alone or in-combination) on the integrity of the site can be shown.

Community and Corporate Plan – Community and People, Pride in Place,

Explanation

- 2.64 The land within the BCG Villages to the south of Windy Corner has substantial environmental constraints. It is partly within the South Devon National Landscape (formerly AONB), and the open country around Kennels Lane, Galmpton and Churston Ferrers forms an important valued landscape within the setting on the National Landscape. The land is also within the Sustenance Zone and landscape connectivity zone for greater horseshoe bats associated with the Berry Head maternity roost, which is part of the South Hams. It contains Torbay's largest area of Torbay's Grade 2 agricultural land. The rural villages have heritage significance.
- 2.65 Any development beyond the approved development at Copythorne Road should be minor and limited in nature and aimed at meeting the area's local needs. The council will take the General Permitted Development Order (10 dwellings/1000 sq. m) as a starting point when considering whether development in the NL is "major" but may apply a smaller threshold where proposals could have a significant impact on landscape and scenic beauty (see paragraph 67 of the 2024 NPPF).
- 2.66 The area provides opportunities for enhanced public and active transport, linking with green infrastructure, tourism, leisure and other uses of the area. Ideally this should capitalise on the area's rich tourism and Agatha Christie associations. It will be important to manage recreation pressure and reduce damage to the calcareous grassland at Berry Head. The SDBCG3 area should therefore include a suitable alternative natural greenspace (SANG) with dog friendly leisure/recreation facilities appropriate to the rural location. This will be part funded by development contributions from development within the Berry Head 8Km recreational zone of influence (see Policies NCS1 and NCS2). There is a need for cemetery provision in Torbay (see Policy SC6), and the area may be suitable for a green burial site in conjunction with other green infrastructure.

Chapter 3: Housing and Regeneration Policies



Figure 10 - Housing and Regeneration

3.1 The Local Plan deals with much more than housing. However, meeting objectively assessed housing needs is an important test of soundness for the Local Plan. Torbay’s substantial environmental, infrastructure and market-capacity constraints mean that it is not able to accommodate its full Local Housing Need (LHN) as calculated by the December 2024 Standard Method (which at Autumn 2025 is 950 dwellings a year). The council has applied the Presumption in Favour of Sustainable Development (at paragraph 11(a-b) of the framework). It has sought to identify the best development strategy it is able to within the environmental, infrastructural and viability constraints it faces. It accepts that the proposed shortfall against LHN will require robust justification, which will be set out in a supporting Topic Paper.

Strategic Policy HS: Overall Housing Strategy and Presumption in favour of Urban Regeneration

The Local Plan proposes to deliver at least 400 dwellings a year, equal to 8,000 dwellings over the period 2025-2045. The Local Plan proposes to deliver homes on the following minimum trajectory:

Year (Financial year beginning 1 April)	Trajectory
2025	200
2026	200
2027	200
2028	200
2029	250
2030	250
2031	300
2032	300
2033	350
2034	350
2035	400
2036	450
2037	450
2038	500
2039	550
2040	550
2041	600
2042	600
2043	650
2044	650

Proposals that provide housing on previously developed land within the defined settlement boundary will be approved unless:

- 1) Harm to protected species, Habitats sites irreplaceable habitats SSSIs, National Landscape, designated heritage assets (and archaeological assets of equal value), or

flooding, drainage and coastal change matters provide a strong reason for refusal.
Or

2) Adverse effects of granting planning permission would significantly and demonstrably outweigh the benefits when weighed against the development plan, read as a whole, and other material considerations. This includes directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes.

Special regard will be given to achieving urban regeneration and boost the supply of housing on previously developed land.

Regeneration areas are proposed for Torquay, Paignton and Brixham Town Centres and are shown on the policies map. The council will work proactively and in partnership with landowners, applicants, and the community to find sustainable solutions to enable development.

The change of use or redevelopment of former hotels to housing will be supported unless other planning considerations significantly outweigh the benefit. The Council will give significant weight to the additional benefits of boosting housing numbers when considering redevelopment proposals in the built-up area, and substantial weight for the delivery of affordable housing through the council's Accommodation Repurposing Programme.

Redevelopment opportunities to increase the number of homes in the Torre Gateway and Preston urban densification areas will be supported subject to other policies in this plan, the retention of employment land or the improvement of employment opportunities. Proposals should contribute to the improvement of active travel and public transport links.

Future Growth Areas are shown on the Policies Map as areas for residential and mixed-use development. These sites should be developed at optimal densities taking in into account the natural and built environment, and provide a mix of housing, employment, community facilities and green infrastructure.

Major greenfield development outside of the built-up area or Future Growth Areas will be resisted, unless brought forward through a Neighbourhood Plan or area allocation development plan document, or meets the requirements of the Affordable Housing Exceptions Sites Policy H8.

All development must achieve the following:

- i) A high quality of urban design and create good quality living accommodation and environments,
- ii) Mixed and balanced communities including the avoidance of concentrations of deprivation and promotion of social connectedness.
- iii) The provision of affordable housing on major developments in accordance with Policy H7.
- iv) Resilience to extreme weather events and incorporation of sustainable drainage and climate resilience measures.
- v) Optimise the use of land consistent with protection of the natural, built, and historic environment and the creation of high-quality living environments. Support will be given to tall buildings where consistent with good quality design, amenity and the historic environment.

Community and Corporate Plan – Improving the delivery, affordability and quality of housing

Explanation

- 3.2 Table 2 below sets out Torbay’s broad sources of housing land. The Plan proactively supports brownfield regeneration by applying a “freestanding presumption” to urban brownfield development within the settlement boundary independently of five-year supply or Housing Delivery Test penalty considerations.
- 3.3 “Strong” reason will be taken to mean that the proposal would cause substantial harm. It is noted that “less than substantial harm” to the significance of a designated heritage asset can still constitute a strong reason for refusal (see paragraphs 214 and 215 of the 2024 NPPF).
- 3.4 Policy HS recommends a stepped trajectory for the purpose of calculating five year housing supply, and the Housing Delivery Test. This is based on the significant infrastructure improvements particularly related to the water cycle and drainage, and additional green infrastructure required to safeguard the marine SAC and South Hams SAC, and likely lead in times for the town centre regeneration schemes. These figures will not be treated as a minimum with regard to development of previously developed land within the settlement boundary or other allocated sites.
- 3.5 This approach is consistent with the importance of making effective use of land and concentrating development in the defined settlement boundary close to existing facilities and sustainable transport.

- 3.6 The council has ambitious town centre regeneration visions and an “Accommodation Repurposing Programme” that promotes the redevelopment of brownfield land (and particularly the conversion of redundant hotels) into new high quality social housing. These are pivotal to meeting the Local Plan’s housing target and will be a key way of boosting affordable housing delivery in the built-up area. Longer term delivery will need to be kept under review, and the Plan assumes that 1,000 dwellings will be delivered on major sites (10+ dwellings) over the Plan period through its Accommodation Repurposing Programme.
- 3.7 It is acknowledged that much of the urban area contains constraints such as flood risk and other infrastructure issues. In addition, a significant part of the built-up area, including the three town centres, are designated conservation areas. Nevertheless, the Plan’s key focus is to develop in these locations due to their wider sustainability benefits. Any heritage impacts of increasing densities and taller buildings in highly sustainable town centres will need to be minimised through high quality design. However, the benefits of development in highly sustainable urban locations and the likely environmental harm of building on less well-located greenfield sites will be balanced against heritage impact.
- 3.8 Policy H1 outlines town centre regeneration areas. The Local Plan identifies opportunities to make better use of the built-up area around the Newton Road to Torre Gateway (see also Policy SDT3) and Preston District Centre in Paignton (see Policy SDP3). These are sustainable urban locations where there are opportunities for urban densification and to make better use of underused land, subject to protecting employment opportunities. These areas are served by public transport, and within moderate walking and wheeling distance of train stations. There is therefore scope to relax minimum parking requirements, so long as improvements to public transport, walking, wheeling and cycling opportunities are achieved.
- 3.9 Policy H2 identifies existing and expanded Future Growth Areas. The West of Paignton was the main area of urban expansion in the previous Local Plan 2012-30, and it is proposed to continue this strategic approach. More detail about the policy requirements from these areas is set out in the area “Strategic Development” policies in Chapter 2 of the Plan. Broadly speaking, where clusters of development sites are likely to provide more than about 200 dwellings they have been treated as Future Growth Areas.
- 3.10 The Local Plan allocates major sites (that is developments of 10 or more dwellings or 1,000 sq. m). Policy H3 contains site allocations for major but less strategic housing proposals outside the town centre regeneration clusters and Future Growth Areas. It is acknowledged that this is not a comprehensive list, and windfall sites will arise over the Plan period.

Windfall sites

- 3.11 The Local Plan allocates sites for “major development” i.e. those likely to deliver 10 or more homes or 1,000 sq. m floorspace. About 120 homes have historically arisen each year from sites of fewer than 10 dwellings. It is not practical to allocate these on the policies map – other than to set out a supportive policy for achieving them. A major plank of this programme is the Council’s Accommodation Repurposing Programme, which is expected to deliver at least 75 dwellings a year (or 1500 over the Plan period). These are likely to be counted elsewhere in the trajectory, so no separate number is set out in in Table 2 (below) to avoid double-counting with urban regeneration and other sites in the built up area (Policies H1(a-c).
- 3.12 Between 2012-24, the average annual number of completions from non-major sites (1-9 dwellings) was as follows:
- Torquay 65 (53.7%)
 - Paignton 42 (34.7%)
 - Brixham (Peninsula) 14 (11.6%)
 - Total average annual homes on non-major sites: 121
- 3.13 Based on historic rates of delivery, the Plan expects 120 homes a year to arise on non-major sites. Neighbourhood Plans are welcome to allocate non-major sites, but caution will be needed to ensure that these are not double counted with the Plan’s windfall allowance.
- 3.14 Note also that the The Town and Country Planning (Development Management Procedure) (England) Order 2010 defines major development as 10 dwellings or 1,000 sq. m. So, a development of fewer than 10 dwellings that is more than 1000 sq. gross internal floor area is still liable for affordable housing under policy H7
- 3.15 It is likely that larger windfalls of more than 10 dwellings will come forward during the Plan period. It is impossible to Plan for such events, nor can the plan rely on this to boost numbers. Where these sites are on previously developed land in the built-up area, Policies HS and H1 provide support in principle. Torbay does not have significant rural brownfield sites other than holiday parks. Policies TO5 and TO6 deal with planning considerations affecting holiday parks. Some holiday parks are located in the National Landscape and close to Berry Head SAC, and if these fall out of holiday use, they should be restored to nature.
- 3.16 The Policies Map defines the settlement boundary: formerly referred to as “within the built up area”. This is defined in the NPPF. Land outside of the settlement boundary falls within the Countryside Area. Small hamlets and settlements, such as Maidencombe and

Churston villages are shown within the countryside area are outside of the settlement boundary. These are subject to Policy C1 of the Plan. Proposals on unallocated greenfield sites outside of the settlement boundary (i.e. in the Countryside Area) are likely to be in conflict with the Local Plan's strategy and therefore will not be supported unless some other material consideration indicates otherwise. One such exception may be for affordable housing on rural exception sites, which is dealt with by Policy H8.

- 3.17 Torbay has a pressing need for affordable housing, and Policy H7 sets out a strategic policy for it. The need for other types of specialist accommodation are covered in policies H9-H13.

Table 2 Potential Broad Sources of Housing

Policy	Potential Local Plan Broad Sources of Housing.		
		Total (20-year plan)	Per annum (20-year plan)
	Town Centre Regeneration and Densification		
H1a	Torquay Town Centre Regeneration	800	
H1a	Paignton Town Centre Regeneration	500	
H1a	Brixham Town Centre Regeneration	50	
	Urban Regeneration along sustainable transport corridors		
H1b	SDT3 Newton Road to Torre Gateway – (Extended gateway area to cover Torre and Newton Road).	500	
H1b	Preston Brownfield Cluster (within environs of the District Centre) Excluding Oldway Mansion.	150	

H1C	Elsewhere within the settlement boundaries (built up area): sites of 10+ dwellings. Accommodation Repurposing sites.		
	Torquay	800	
	Paignton	350	
	Brixham	190	
	BCG Villages (including Copythorne Road)	80	
N/A	Windfalls (all non-major sites) at 120 dwellings a year	2400	
H2	Future Growth Areas		
H2/SDT2	Torquay Gateway, Edginswell	550	
H2/SDP4	Collaton St Mary, Paignton	600	
H2/SDT5	Long Road, White Rock and Inglewood, Paignton (and BCG Villages) dwellings	700	
	Total in Future Growth Areas (will become within settlement boundary when developed).	(2000)	
H3	Additional Sites outside Current Settlement Boundary	700	
		8370	
	Total	8000	400

Strategic Policy H1a: Town Centre Regeneration Areas

Proposals that regenerate or remodel town centre areas and adjoining areas, whilst enhancing the living environment and providing a high quality environment which is resilient to climate change will be supported.

Proposals should promote good design that conserve or enhance the character of the built and historic environment, taking into account the need to support urban brownfield development and regeneration. Tall buildings and urban densification in town centres will be supported unless adverse impacts constitute a strong reason to resist development. Proposals must demonstrate that they will not lead to an increase in water draining into combined sewers and will be safe for their lifetime.

Proposals should provide mixed use developments, including new housing provision unless there are clear planning reasons not to include housing

Detailed proposals will be developed through master planning of Supplementary Plans for the areas. Town Centres are expected to provide at least the following number of dwellings on major sites over the Plan period.

- Torquay 800 dwellings
- Paignton 500 dwellings
- Brixham 50 dwellings

Community and Corporate Plan – Pride in Place

Explanation

In line with the Local Plan’s driving strategy of maximising the use of previously developed land, Policy H1 sets out a presumption in favour of urban regeneration of brownfield sites. Table 3 below sets out broad number of homes that they could deliver. This should not be taken as maximums if schemes come forward that would exceed this number.

Table 3 Town Centre Regeneration Areas

Area	Sites (for information- to be put into a topic paper in the	Yield (Numbers are approximate and subject

	Publication Plan as there is a freestanding Presumption to support town centre regeneration).)	to further assessment/ masterplanning)
Torquay		
H1T1 Castle Circus Area	Town Hall Car Park* 21T032a Magistrates Court 21T070 10 completed 12 Castle Circus House & adj. Buildings 21T140 30 Former Argos block 100	
H1T2 South West of Union Street, Lower Union Lane,	Union Street north of cinema including Nat West (90-96)_100 21T146 Land rear of Castle Circus House* 30 21T141 Former New Look Store 20 21T123 Telephone Exchange Lower Union Lane* 70 Lower Union Lane Car Park 200 Within Temptation/ Hop and Grapes 30	
H1T3 NE of Union Street , and Market Street, Pimlico	21T037 Former Blockbuster/ Morrisons 40 All Pimlico including 21/T040 and 21T041 and Pub 60 21T075 Union Square 100 Market Street north of Castle Lane 20 net gain	Objection to 21T034 former Auction Rooms, now Store Store 24, by the owner.
H1T4 Abbey Road, Rock Road, Roebuck House	21T038 Roebuck House* TCRT013 Adj. Abbey Hall (former Laundry Site)	
H1T5 Fleet Street, Torquay Harbour: Living Coasts, Strand, and Marina Car Park	21T161 30-34 The Terrace* 24T008 48-50 The Terrace 21T081 Strand and Torquay Harbour 21T139 The Marina Car Park (adj. The Pavilion) TCRT018 Living Coasts 21T093 The Imperial Hotel* 50 21T047 Fleet Walk Shopping Centre (upper floors).	
Torquay Town Centre Sub Total		800
Paignton		

H1P1 Paignton Harbour	22P003 Paignton Harbour R/o Roundham Road	
H1P2 Crossways and adjacent land and Victoria Street	21P025 Crossways 24P005 12-14 Victoria Street	
H1P3 Victoria Square	21P027 Victoria Square	
H1P4 Paignton Gateway: (Station Lane and Station Square)	TCRP04 21P028 Paignton Gateway 80, TCRP05 Station Square 62-70 Victoria Street 21P048 40 21P026 Hyde Road and Torbay Road Former Woolworths, Peacocks, Superdrug etc. 50	
	New Sites	
H1P5 Paignton Hospital	60	
Paignton Sub Total		500
H1B1 Brixham	Middle Street , SW of Apters Hill (Primary Shopping Area removed) Fore Street Upper floors-	50

3.18 Further details are set out in the “Strategic Development” policies for the town centres (SDT2 Torquay, SDP2, Paignton and SBD2 Brixham). The Local Plan proposes a “Presumption in Favour of Regeneration” which supports brownfield urban development subject to other plan considerations. The above sites have been identified as being within the regeneration clusters. More detailed assessments will come through master planning or neighbourhood plans. Some of these sites will be mixed use developments including ground floor commercial use where viable. Some of the sites are within conservation areas or other designated heritage assets. Good quality design will be required to conserve or enhance these; however the need to deliver homes in highly sustainable town centre locations carries significant weight in the planning balance.

3.19 It will be important that developments are safe for their lifetime from the effects of climate change, and particularly flooding. It will simply not be possible to meet Torbay’s housing need without some development in areas of flood risk. However, development must avoid sleeping accommodation on ground or basement floors in flood vulnerable areas and provide safe escape routes and resilience measures. Development must not lead to an

increase in water draining into combined sewers. Where onsite measures such as sustainable drainage are not feasible, a planning contribution towards upstream water retention measures will be required as a site deliverability issues (See Policies ER1 and ER2).

- 3.20 Within town centres a minimum level of car parking will be required (see policy TA4) subject to appropriate investment into walking, wheeling, cycling and public transport facilities. All development, and particularly new homes should provide secure, covered and fire-safe parking for electric cycles with charging facilities where possible.

H1b **Densification around Urban Sustainable Transport Corridors (revised Policy H3)**

Urban regeneration clusters in the Torre Gateway and Preston area are identified in Policies SDT3 and SDP3. Redevelopment proposals that maximise the delivery of housing consistent with their location close to transport hubs will be supported. Proposals should not result in the loss of employment space unless there is a net employment or economic benefit arising from development.

Explanation:

- 3.21 The Local Plan has identified opportunities for urban densification and reuse of land in the urban corridor between Edginswell and Torre and Preston. These areas are well connected by public transport and in the Torquay Gateway’s case close to Torre train station and the proposed Edginswell train station. More detailed proposals are set out in area Policies SDT3 and SDP3. The following sites are set out as examples of where development may arise but other sites are likely to arise during the Plan period.
- 3.22 The council will prepare masterplans. Where detailed site assembly is needed, or there is a requirement to secure more socially beneficial use of sites, the council will consider the use of compulsory purchase to deliver sites if necessary.

The following broad urban regeneration clusters are proposed for housing development:			
Ref.	Site	Anticipated number	Notes

	Torquay		
	SDT3 Newton Road to Torre Gateway – Extend gateway area to cover Torre and Newton Road. A higher figure was considered (850) but not included in order to support continued provision of employment land.	500	
	Newton Road (hotels)		
	Torre Station		
H3T.13	Grounds of Rowcroft, Avenue Road		Approved 24/T009–assisted living units
	Kwik Fit, Torre (in conjunction with Torre Marine – see below H3T.23)		
H3T.23	R/O Edinburgh Villas, McKay Avenue, Torre Marine (Specialist housing) 70		21T095
	Densification around Local Centre.		
SDP3	Preston District Centre and Regeneration Hub		
	Hollacombe, Chadwell Centre, employment buildings, 50 dwelling reduction due to Oldway not being deliverable (Heritage objections).	150	

Policy H1c Housing elsewhere within the Settlement Boundary (Revised Policy H3)

In accordance with Policy HS, housing proposals within the built up area will be approved unless the benefits of doing so would be substantially outweighed by the adverse effects, when considered against other policies in this Plan.

Other urban brownfield sites will be supported subject to other Local Plan considerations.

Explanation

- 3.23 The Local Plan focusses heavily on development within the settlement boundary, and has a large number of urban sites that are likely to be suitable for development. The table below is not comprehensive but lists sites within the settlement boundary that have been

assessed as being suitable to accommodate development of more than 10 dwellings. However, other sites are likely to arise over the Plan period.

- 3.24 Non-major sites of fewer than 10 dwellings/1,000sq m) will be treated as windfall developments and are not listed here.
- 3.25 Other planning considerations including design, heritage issues, flooding and drainage and ensuring no likely significant effects on Habitats Regulations issues must be taken into account when considering development proposals.

The following sites are proposed for housing development:			
Ref.	Site	Anticipated number	Notes
	Torquay		
	Example of other sites in the Built up Area (note that other sites may arise).		
H3T.3	Brunel Manor, Conversion of buildings.	15 (35 gross)	Conversion of Brunel Manor 21T148.
H3T.5	Land at Kingskerswell Road and r/o Barton Hill Road	10	21T056 (ULPA but within built up area)
H3T.6	Holiday Parks, North of The Willows	250	21T016,21T017, 21T018 Existing allocation. Need to retain and enhance tree cover.
H3T.8	Babbacombe Business Park, Babbacombe Rd, Torquay	12	21T072
H3T.9	Land North of Bottompark Lane, Barton Hill Road.	20	21T145
			(completed)
H3T.11	Grand Hotel Garage Block	10	21T138
H3T.28	Bancourt Hotel, Avenue Road	40	21T054
H3T.14	Maycliffe Hotel, St Lukes Road South	15	24T002
H3T.16	Site 1 Higher Cadewell Lane	18	21T021
H3T.17	Site 2 Higher Cadewell Lane	12	21T020
H3T.18	Hatchcombe Lane, Scotts Bridge/Barton	50	21T129
H3T.19	Westhill Garage, Chatto Road	15	21T131
H3T.20	Seabury Hotel, 11 Manor Road, Torquay	12-20	21T080
H3T.22	Stoodley Knowle, Ansteys Cove Road, Torquay	80	21T085(not including built units)

H3T.24	Shelley Court Hotel, 29 Croft Road, Torquay (With all hotels: need to avoid double counting with Accommodation Repurposing Programme).	20	21T003
H3T.26	Conway Court, Warren Road	14	21T060
H3T.27	Shedden Hall Hotel Site, Shedden Hill	30	21T124
H3T.28	Bancourt Hotel, Avenue Road	30	21T054
H3T.30	Coppice Hotel	20	
H3T.31	Hotel Virginia, Falkland Road (With all hotels: need to avoid double counting with Accommodation Repurposing Programme)	15	
H3T.32	Chelston Telephone Exchange Goshen Road	20	24/T005
H3T.33	Menzies House Parkfield Road	10	24/T007
	Proposed New sites		
	St Peters Church, Queensway		
	Shedden Hill Car Park	20	
	Seascape Hotel	30	
	Burlington Hotel	20	
	Torquay Sub Total	@800	Number above comes to 844 but need to avoid double counting: therefore 800 is a more realistic figure.
	Paignton Example of other sites in the Built up Area (note that other sites may arise).		
H3P.5	Summerhill Hotel, Braeside Road	10	21P055
H3P.6	Former Kia Garage, Totnes Road	25	
H3P.7	Totnes Road Service Station	15	
H3P.9	Alan Kerr Garage, Brixham Road	15	21P033
H3P.10	Church site, Bellfield Road, Foxhole	25	21P069
H3P.11	3 Keysfield Road	13	21P085
	New Sites in the built up area		

	Toyota Garage, Totnes Road	15	
	YMCA Dartmouth Road	40	
	Kings Ash House	15	
	Cornerplace Surgery Dartmouth Road	15	
	Orchard End, 9 Brixham Road , Tweenaway Cross DE2026/0010	15	
	H2P.2 Great Parks Phase 2 160 21P014 North of Luscombe Lane, Great Parks 21P068 Great Parks Phase 2 (Allocation H1.12) 21P081 Former Local Centre (Number additional to completions at 2025).	150	
	Paignton Sub Total	350	
	Brixham (Town Council area) Example of other sites in the Built up Area (note that other sites may arise).		
H3B.1	Wall Park Extensions (R/O Wall Park Farm, 39 Wall Park Rd), Brixham	20	
H3B.2*	Brixham Paint Station, Kings Drive**	35	Increase. 21B007 Include church area
H3B.3*	Site of Northcliff Hotel	15	21B008
H3B.4*	St Kildas (Specialist housing)	20	21B011
H3B.5*	Torbay Industrial Estate Part 1	10	21B053 Subject to amenity issues
H3B.6*	St Marys Road (Old Dairy Buildings)	30	22B001
H3B.7	Former Jewsons, New Road.	20	P/2024/0311
H3B.8	Brixham Hospital	15	25B001
	New Sites in Brixham		
	Laywell House, Summer Lane	25	
	Brixham Sub Total	190	
	BGC Villages		
H3BCG.4	Copythorne Road	77	Permission P/2023/0480
	BCG Villages Sub Total	80	(77 rounded to nearest 10)
	Total		

Strategic Policy H2: Future Growth Areas

Future Growth Areas are allocated for strategic development within Torbay. They should be developed as sustainable mixed use developments, including housing, in accordance with the principles set out in the relevant Sustainable Development (SD) policies:

The following Future Growth Areas are allocated for development:

Area	Local Plan Relevant Local Plan Policy	Indicative level of dwellings
SDT2	Torquay Gateway, Edginswell	550
SDP4	Collaton St Mary, Paignton	600
SDP5	Long Road, White Rock and Inglewood, Paignton (and BCG Villages)	700

Community and Corporate Plan – Pride in Place

Explanation

- 3.26 Future Growth Areas are broad locations for growth. Policy requirements are set out in the relevant “SD” policies in Chapter 2. Table 4 sets out indicative sources of housing within Future Growth Areas. Updated masterplans will be prepared showing how they can be delivered as mixed use areas that make provision for a range of uses including employment, housing.
- 3.27 Torquay Gateway (Edginswell) is allocated in the Torbay Local Plan 2012-30. The 2016 Masterplan will be updated to set out how the site can be delivered.
- 3.28 Great Parks Phase 1 was built in the 1990s, with some more recent completions of the second phase of development. The second phase has remained undeveloped for several

decades due to infrastructure issues. The creation of a second access road to serve the Lidl store (opened in 2025) will help unlock the later phases of development to the north of the area. A non-statutory masterplan (2013) was endorsed by Policy PNP21 of the Paignton Neighbourhood Plan, but will be updated.

- 3.29 Collaton St Mary: The bulk of Collaton St Mary is allocated for development in the Torbay Local Plan 2012-30 and the subject of a Masterplan SPD adopted in 2016. The draft Local Plan proposes to extend these areas. An updated masterplan will be needed to deal with access issues, and making the development accessible for active travel and public transport.
- 3.30 Long Road/White Rock: The Long Road/White Rock area is allocated in the Torbay Local Plan 2012-30 and is mainly built. However, there are further opportunities for development of homes and employment. It will be important to preserve the environmental and historic character of Yalberton Valley and hamlets of Higher and Lower Yalberton.
- 3.31 The south of this area falls within the Broadsands, Churston, Galmpton Village Forum Neighbourhood Plan area (See Policy SDBCG2). It will be important to maintain a settlement and visual gap between the built-up area and the more rural settlements to the south, which sit within the setting of the South Devon National Landscape.

Table 4 Future Growth Areas

Ref.	Site	Approx. Number of dwellings	
H2T.1	Torquay Gateway, Edginswell, Torquay	550	21T122 The 2025 Masterplan will need to be updated, but it is important to maximise housing delivery insofar as this does not undermine other Local Plan objectives including the delivery of employment land.
H2P.3	Collaton St Mary, Paignton (Extension	600	21P042 Land adj. Bona Vista Holiday Pk, Totnes Rd 21P043a Land adj. Beechdown Farm Bungalow, Totnes Rd (extended site) 21P041 Plot 1 & 2, Totnes Road

The following sites are allocated for housing. All proposals for housing, will contribute to creating sustainable, inclusive and mixed communities. This will be achieved by providing an appropriate mix of decent, good quality homes, which provide for affordable housing as set out in Policy H7.

Sites should be developed at the highest density appropriate to their location and consistent with good design. Proposals that do not make optimal use of land will be resisted.

Table 5 Proposed Housing Sites

The following sites are proposed for housing development:			
Ref.	Site	Anticipated number	Notes
	Torquay		
H3T.1	Maidencombe North of Sladnor park and around Jon Glanvill Autos. HELAA Sites	150 TBC 30 confirmed at 08 May	Allocated subject to there not being a landowner objection. Where there is a landowner objection, the site will be removed. Part 21T143 and 21T065 remain allocated.
H3T.2	Sladnor Park, Maidencombe. Due to High Court decision the principle of development has been established, see application P/2020/0315*	120	21T064 Subject to successful resolution of drainage issues. Due to its location within the coastal landscape, the bulk of the site will remain outside of the settlement boundary, with the exception of the development area broadly corresponding to the previously developed area of Sladnor Park.
			Site deleted due to lack of evidence of promotion and objection from Cherry Blossom Farm, which makes access impractical.

H3T.3	Additional site to the north of Brunel Manor.	10	Conversion of Brunel Manor 21T148. Land to the north 23T007
H3T.7	Land adjacent and south of Watcombe Hall	10	24T012 Site to remain outside of the settlement boundary due to its coastal location.
H3T.12	Land adjacent to Broadley Drive, Livermead, Torquay	50	21T050
H3T.29	Hollicombe (former gas works) – all of the site developed for housing or flood alleviation/open space/biodiversity. DE2017/0407.	~~50-100 or~~ 185	21T015. Number reverts to 185 to reflect permission and pre-application DE2017/0407:188 units.
	Torquay Sub Total	425	
	Paignton		
H3P.1	North of James Avenue – extend the existing site. Scope to increase to 50	50	21P087
H3P.2	Barton Pines	50	24P006. Removal of holiday occupancy policy. Due to location outside of the built up area, the site will remain outside of the Settlement Boundary
H3P.3	Land at Preston Down Road North, Paignton	50	21P017 Previously allocated site

H3P.4	Land at Preston Down Road South, Paignton	50	21P018 previously allocated site
H3P5	Hilltop Nursery, Great Parks	10	21P051 Hilltop Nursery
	Paignton Sub Total	200	
	Brixham (Town Council area)	0	
	BGC Villages		
H3BCG. 1	Gliddon Ford Filling Station, Dartmouth Road, Churston Ferrers. Access to the Archery Field	10	21B001
H3BCG. 2	Archery Field, Churston	50	21B005
	BCG Villages Sub Total	60	
	Total	700	(assumes 50 at Maidencombe – other sites awaiting confirmation.

Community and Corporate Plan – Improving the delivery, affordability and quality of housing

Explanation

3.32 As noted in Policies HS and H1 the Local Plan seeks to support development within the settlement boundary (i.e. the built-up area). There are fewer opportunities for sustainable development outside of the built up area or defined Future Growth Areas. Policy H3 allocates a limited number of sites on the edge of the existing built up area for housing. When built they will become part of the built-up area and fall within the settlement boundary, unless it is specifically indicated that they will remain outside of the settlement

boundary. They will require strategic landscaping to create a break between the built up area and countryside area.

- 3.33 There is an expectation all major development will provide affordable housing in accordance with Policy H7. Applications should also meet other Local Plan requirements in relation to providing a high quality of design, climate change resilience, environmental protection etc.

Policy H4: Achieving Optimal density

New housing should be developed at maximum densities consistent with protecting the natural and built environment, providing well-designed places, resilience to climate change including water management, and providing a decent standard of accommodation and residential amenity.

In particular, high densities will be supported on urban sites and are located within easy walking and wheeling distance of public transport, food stores, community facilities and public open space. In these circumstances car parking provision may be reduced.

Developments should ensure that safe access for emergency vehicles can be achieved and that safe covered provision for electric cycles is provided.

Regard must also be had for amenity issues in relation to existing uses and avoid new housing where it would lead to pressure for existing commercial or leisure uses to be curtailed.

Community and Corporate Plan – Community and Place

Explanation

- 3.34 Torbay has very little opportunity to expand outwards and the limited green hinterland that exists has significant environmental designations. It is important that new housing on both greenfield and brownfield sites is provided at the highest density consistent with providing an adequate level of privacy, amenity and tranquillity for residents.
- 3.35 Paragraphs 129-130 of the NPPF (2024) require plans to make the best use of land and for minimum density policies to be considered, especially in urban locations that are well served by public transport.

- 3.36 Because Torbay has a range of landscape, historic and built environment constraints, it is not feasible to set out a clear minimum density. However, greenfield housing developments should seek to achieve 30-50 dwellings per hectare. Proposals that achieve lower than 30 dwellings per hectare will need special justification in terms of design, landscape or ecological constraints.
- 3.37 Higher densities should be provided in town centres and other locations within easy reach of facilities and public transport. It will be important to consider living conditions of residents in such proposals and to avoid “agent of change” issues whereby new housing leads to conflict with existing businesses or uses. This will be an important consideration for new housing development close to commercial areas such as waste management, harbours and waterfronts, and the fishing industry.

Policy H5: Conversion of buildings into flats

Applications for the conversion or sub-division of buildings into flats will be supported where:

- i) The accommodation provided creates good quality accommodation of a reasonable size with ample provision for amenity space, parking and waste/recycling provision having regard to the surrounding area.**
- ii) The proposal does not lead to a concentration of deprivation, for example by creating very small dwellings or dwellings with poor living conditions. Special attention will be had to Community Investment Areas or later Indices of Deprivation.**
- iii) The conversion of family houses of up to around 110 sq. m floor area into small apartments will be resisted, unless this can be shown to have a positive benefit for the creation of mixed and balanced communities.**
- iv) The buildings are self-contained.**
- v) The proposal incorporates improvements to the fabric of the building, including the removal of deleterious additions, particularly in conservation areas.**
- vi) The proposal is acceptable in terms of its environmental, water management, and ecological impact. In particular it will not lead to additional pressure on drainage or Special Areas of Conservation.**
- vii) The proposal will not lead to a net increase of water into the sewer network. Proposals should retrofit surface water sustainable drainage or attenuation to**

create at least an equal volume of capacity for waste water. Where onsite measures are not feasible, a contribution will be required for off-site measures.

viii) The conversion of buildings achieves best use of land, having regard to heritage and other policies in the Local Plan.

Community and Corporate Plan – Improving the delivery, affordability and quality of housing

Explanation

- 3.38 Some conversion of buildings to apartments can be carried out under “prior approval” which is a reduced “permitted development” consent regime in Part 3 of the General Permitted Development Order (GPDO). Local Plan is strongly supportive of brownfield development. However, the creation of very small apartments can exacerbate Torbay’s severe deprivation problems and reduce the availability of family accommodation. It is also important that converted apartments should not result in poor living conditions. Whilst the policy does not apply rigid space standards, self-contained apartments of less than 37sq m. are likely to be in conflict with Policy H5. Regard will also be had to natural light, overlooking and outlook etc.
- 3.39 Where historic buildings are sub-divided, the council will seek to achieve built environment improvements including the removal of harmful features, such as later lean-tos, roof extensions and other mid C20th features. These were often applied to buildings formerly in holiday use.
- 3.40 Other policies relating to flooding, water management and reducing the amount of water draining into shared sewers, will be important to mitigating flood risk.

Policy H6: Loss of homes

Where proposals result in the loss of housing, including through the combination of dwellings, applicants should demonstrate that one or more of the following apply:

- i) The proposal would result in improved standard of accommodation and improved living conditions where the existing standard and conditions are poor.**
- ii) The proposal would make a positive contribution to reducing deprivation.**

iii) The proposal would restore or enhance historic features or architectural features of heritage assets.

iv) It is demonstrated that the loss of housing would be outweighed by a regeneration, economic or environmental benefit.

Proposals that do not achieve one or more of the above will not be supported. The council will consider the impact of loss of dwellings on housing supply and the creation of mixed and balanced communities.

Where the amalgamation of dwellings is approved, a condition will be attached to restrict use as a house in multiple occupation unless all of the criteria in Policy H10 are met.

Community and Corporate Plan – Community and Place

Explanation

- 3.41 Torbay’s constrained land supply means that it will be important to maintain the existing dwelling stock for residential use. As such the amalgamation of dwellings will be regarded as development that requires planning permission. It is important to note that housing stock does not provide a good standard of accommodation, particularly where buildings have been badly sub-divided into flats, or holiday apartments have lapsed into permanent occupancy. Concentrations of such accommodation can create deprivation hotspots and poor living conditions, mainly for private sector renters. In such cases the amalgamation of dwellings will be supported if this would improve the quality of the environment or support mixed and balanced communities.
- 3.42 The council will resist the creation of very large dwellings, where this does make good use of land, or could lead to multiple occupancy. Where necessary, permitted development rights for use as class C4 HMOs will be removed.
- 3.43 In assessing the “reasonable” size for a dwelling the council will have regard to the following guideline sizes. Layouts that significantly exceed this (e.g. by more 20%) are likely to raise questions about whether a proposal is making best use of land.

Table 6 Typical Floorspace Range of Dwellings.

General description	Floorspace range (excluding communal areas)	Typical of dwelling type
Smaller Apartments	37 – 59 sq. m	Studio and 1-2 bedroom flats
Small-medium dwellings	60-79 sq. m	2-3 bedroom apartments, Smaller 2-3 bedroom houses.
Medium size dwellings	80-108 sq. m	Large apartments, 3-4 houses.
Larger dwellings	109+ sq. m	4+ bedroom houses

- 3.44 There may be instances where the loss of housing is necessary for economic purposes, e.g. to support infrastructure improvements. Such instances are likely to be uncommon, and the public interest economic or other benefits will be taken into account as part of the overall justification for the loss of dwellings.

Strategic Policy H7: Affordable Housing

Policy requirement

Residential development will contribute to meeting affordable housing needs across Torbay by providing a proportion of new housing as affordable homes.

All major residential developments (meaning developments including mixed use developments that contain 10 or more dwellings irrespective of use class or where the site has a combined gross floorspace of more than 1,000 square metres, or is located in the National Landscape) will be required to contribute towards the provision of affordable housing as set out in Table 7:

Table 7: Affordable Housing Thresholds

New dwellings (gross)	Proportion of affordable housing	Equal to no. of homes	On-site or offsite. Note that smaller sites may also provide affordable housing on-site in

18	27%	4.86	Onsite unless offsite provision is agreed with the Head of Housing.
19	30%	5.7	Onsite unless offsite provision is agreed with the Head of Housing.
20+	30%	6 (+0.3 per dwelling thereafter)	Onsite unless offsite provision is agreed with the Head of Housing as a special exception.
Allocated sites in the South Devon National Landscape			
All sites in the South Devon National Landscape	Exceptions sites in accordance with Policy H8.		Onsite unless agreed by the Head of Housing. Unallocated sites in the National Landscape are likely to only be acceptable as rural exceptions affordable housing sites. A higher rate of affordable housing will be sought from rural exception sites in the National Landscape in accordance with Policy H8.

- i) **The affordable housing should be provided on-site where indicated above. Off-site provision or commuted sums will only be considered on sites of 15+ dwellings in exceptional circumstances and must be justified with a planning statement demonstrating that:**
 - a. **there is a good planning reason why on-site provision is not viable or practical.**
 - b. **Contributions of land and/or money are made sufficient to achieve the same or greater number of affordable homes than would be achieved through onsite provision.**
- ii) **Within the South Devon National Landscape, ~~allocated~~ sites (of whatever size) should additional affordable housing in line with Policy H8.**
- iii) **Unallocated sites in the countryside area will be subject to policy H8 Affordable Housing Exceptions sites in the Countryside.**

- iv) A site's overall capacity to accommodate dwellings will be taken into account when calculating the affordable housing requirement. Proposals that artificially sub-divide, or under-develop sites will be resisted.

Tenure Mix

- v) The tenure of affordable housing should be agreed through the planning process. The council will seek:
- a. 70% Social Rent
 - b. 30% Intermediate housing (Shared Ownership, ~~Discount Market Sale~~ and other affordable housing as defined in the NPPF and Glossary.)
- Regard will be had to up-to-date local evidence of housing need and evidence of viability.

Design and Integration

- vi) Affordable housing must be indistinguishable in appearance from market housing and fully integrated within the development, including provision in clusters.
- vii) Affordable units must meet the Nationally Described Space Standards and Building Regulations Part M4(2) (Accessible and Adaptable Dwellings) unless otherwise agreed.

Viability and Flexibility

- viii) Where applicants seek to provide fewer than the required affordable units due to viability concerns, they must submit a proportionate Viability Assessment in accordance with the National Planning Practice Guidance and local validation requirements. All viability assessments must be:
- Submitted at the planning application stage;
 - Made publicly available;
 - Reviewed by an independent assessor appointed by the LPA, at the developer's cost.
- ix) Before reducing the quantity of affordable housing, other options such as changing the tenure mix or other funding sources must be investigated.

Delivery and Timing

x) Affordable housing shall be delivered in phases alongside market housing unless otherwise agreed through a planning condition or Section 106 agreement.

xi) Developers will be required to:

- **Enter into a Section 106 Agreement to secure affordable housing;**
- **Provide details of the proposed Registered Provider or alternative delivery mechanism.**

xii) The early development of affordable housing on site will be encouraged

xiii) The provision of additional affordable housing on non-major sites, or in excess to the plan requirement will be supported in principle, subject to the creation of mixed and balanced communities.

Community and Corporate Plan – Improving the delivery, affordability and quality of housing

Explanation

- 3.45 Torbay has a very pressing need for affordable housing. Around 8% of Torbay's housing stock is made up of affordable housing, compared to around 18% nationally. Increasing the levels of affordable housing, providing a range of tenures and housing types within mixed and balanced communities can aid social mobility.
- 3.46 Policy H7 ensures that all major residential developments contribute to affordable housing supply, and support the creation of mixed and balanced communities. The policy provides flexibility where schemes are genuinely unviable but prioritises on-site provision in line with national policy and local housing needs.
- 3.47 The Policy also supports the delivery of affordable housing on non-major sites, whilst respecting the nationally prescribed threshold of 10 dwellings (or 1,000 sq. m) outside of the National Landscape. On that basis, non-major sites are likely to come forward through non-S106 routes, unless provided as local need rural exceptions sites (see policy H8 below).

- 3.48 Early discussion with the council's Head of Housing or Affordable Housing Manager should take place to agree location, tenure and timing of provision.
- 3.49 When negotiating affordable housing tenure, regard will be had to evidence of housing need, including the latest Housing and Economic Needs Assessment (currently 2021), waiting list and affordability data.
- 3.50 The expectation is that affordable housing should be provided on-site for larger sites. However, the policy allows for the provision of land or financial contributions for provision elsewhere. This must be agreed by the council's Head of Housing (or equivalent post) and provide for at least an equivalent number and type of affordable homes that would have been provided on site. It should also take into account the additional costs of off-site provision such as site acquisition.
- 3.51 The council will consider a site's capacity to provide affordable housing and resist attempts to under-develop sites or subdivide plots to minimise affordable housing liability. This also includes providing abnormally large dwellings or void areas in building layouts (unless justified by other constraints such as flood risk etc). It will be assumed as a starting point that sites are capable of providing 30 dwellings per hectare gross, although extenuating factors will be considered. Developments of apartments are likely to be capable of providing significantly higher levels than 30 dwellings per hectare.
- 3.52 When assessing whether land is an "incremental" site where affordable housing may be sought the council will consider matters such as land ownership, whether sites are directly adjacent or connected, and any levels differences between sites.
- 3.53 Torbay's main need is for rented affordable housing; however, demand for intermediate affordable housing has increased in recent years (e.g. as shown by the increase from 10% of need in the 2011 Housing market assessment to around 40% in the 2021 HENA). It is also important that affordable housing is provided as mixed and balanced communities and that concentrations of deprivation are avoided (see Policy SCS). The provision of intermediate housing can assist with the creation of mixed and balanced communities and aid viability. The council's preferred means of delivering intermediate housing is through shared ownership homes managed by registered providers. There is currently a high take up for these. The NPPF does acknowledge that other forms of intermediate housing, such as discount market sales housing do exist. Where proposed, other forms of tenure should be agreed with the Affordable Housing Manager.
- 3.54 The NPPF (paragraph 65) and PPG requires councils to allow Vacant Building Credit to be granted to incentivise the reuse or redevelopment of vacant buildings. Eligibility for VBC will be determined by Torbay Council at application stage. Robust evidence will be required to support an application for VBC. Buildings that have been abandoned or made vacant for the purpose of redevelopment will not be eligible. The council will have regard

to the definition of vacant buildings in the CIL Regulations (2010 as amended) when considering VBC eligibility i.e. a vacant building is defined as not having been in lawful use for 6 months or longer in the last 3 years. However, the council will also have regard to the imperative of incentivising brownfield development.

3.55 Where the provision of affordable housing may render affordable housing unviable, it is important that early discussion takes place with the council's Affordable Housing Manager. An independent assessment of viability will be required, with the developer underwriting the cost of the viability assessment. A reduction in the level of affordable housing provision will only be agreed where:

- i) The provision of affordable housing is shown to make the development unviable.
- ii) Other options to achieve policy compliant level of affordable housing have been explored. These include (but are not limited to) increasing the proportion of intermediate housing, or sale to an affordable housing provider.
- iii) A recovery mechanism is provided that allows affordable housing to be provided should viability improve, based on a deferred calculation of development profitability.

Viability assessments should be proportionate to the proposal and consider whether there are abnormal costs such as contamination or additional policy requirements such as climate change resilience and Habitats Regulations mitigation.

3.56 Affordable housing will be prioritised for local people through local lettings policy (Devon Home Choice). Proposals that provide particular support to groups such as care experienced young people will be given particular support.

3.57 This policy will be reviewed periodically to ensure continued alignment with national policy, housing needs, and viability evidence across Torbay.

3.58 More detailed advice on the implementation of this policy will be set out in updated Planning Contributions and Affordable Housing Supplementary Planning Document.

Policy H8: Affordable housing exceptions sites in the countryside

In the countryside (as shown on the Policies map), the development of sites for affordable housing to meet the needs of local people will as a rural exception will be supported where:

- i) There is a proven need for affordable housing from households that have a strong local connection; and
- ii) The site adjoins a settlement and does not have a significantly adverse impact on environmental, landscape, or historic assets, individually or in combination with other developments; and
- iii) The scale of provision is limited to meeting the identified local need; and
- iv) Dwellings remain as affordable housing for local people in perpetuity.
- v) The proposal is acceptable in terms of its landscape, ecological and other impacts , and in particular does not have adverse flooding, drainage or water management impacts.

There is an expectation that homes permitted as rural exception housing should be 100% affordable housing.

Where market homes are proposed to support the overall viability of the site, they will need to be supported by a viability assessment indicating why they are necessary to deliver the development. Market homes should in any event be a small proportion of dwellings, up to 30% of homes on site.

Community and Corporate Plan – Improving the delivery, affordability and quality of housing

Explanation

- 3.59 Policy H8 sets out criteria for considering rural exceptions where this would achieve affordable housing to meet an identified local need. Since the policy allows housing to be built in locations where it would not usually be acceptable, it should be limited to providing affordable housing. To achieve this a s106 obligation will be sought to require the dwellings to be provided as affordable housing and retained as such in perpetuity. Occupation should meet local needs with a cascade to town level and Torbay level if not achieved. This will be managed through a local lettings policy via Devon Home Choice.
- 3.60 It will be assumed that dwellings will be 100% affordable, with an emphasis on social rent. Where it is argued that market housing is needed to achieve viability, robust evidence will be required to demonstrate this, having regard to other available sources of funding including public subsidy. No more than half the homes may be provided as open market dwellings.

- 3.61 Policy H8 is expected to deal with relatively small sites in general. Because the dwellings would not normally be acceptable other than to meet affordable housing needs, it is considered appropriate that the normal threshold for affordable housing is waived.
- 3.62 Proposals should not cause serious landscape or ecological harm and should be able to provide safe access.

Policy H9: Self-build housing in Future Growth Areas

To accommodate demand for self-build homes, the provision of at least 1% of dwellings within Future Growth Areas, shall be provided as serviced plots for sale to self or custom home builders.

This will be controlled by the following means:

- i) The provision of serviced plots in an agreed location will be set out through a s106 Planning Obligation.**
- ii) Where plots have been made available and marketed appropriately for at least 3 months and have not sold, the plot(s) may either remain on the open market as self-build for up to 12 months, or be offered to the council for affordable housing. Where no take up of self-build plots occurs within 12 months, it should be offered to the council for the provision of affordable housing.**
- iii) Planning permissions should include conditions requiring self-build developments to be completed within 3 years of a self-builder purchasing a plot.**
- iv) If provision is made off-site, alternative sites should be provided as serviced plots with planning permission.**
- v) Where the provision of serviced plots for self-build is not practical for site assembly, layout or other reasons, an equivalent number of homes should be provided as affordable housing.**

Community and Corporate Plan – Community and Place

Explanation

- 3.63 Policy H9 seeks a small proportion Future Growth Areas to be provided as self-build plots. In the context of this policy, self-build also refers to custom build plots. These should be provided by the developer as serviced plots, and will be allocated from the Self Build Register with first preference to existing Torbay residents or those with a strong family connection.
- 3.64 Where the provision of serviced plots is not practical, for example due to site servicing or insurance reasons, the provision should be rolled into the provision of affordable housing (and additional to the affordable housing requirement). The assumption will be that such units will be offered for sale through a Registered Provider as shared ownership products through a local lettings policy. Similarly, where there is no take up of self-build plots, they should default to affordable housing.
- 3.65 Where self or custom-built homes are built, whether on allocated sites or through windfall sites, it is essential that CIL Self Build Exemption is applied for as an application validation measure, even if the development is zero rated for CIL.

Policy H10: Houses in Multiple Occupation (HMOs)

The conversion of HMOs to self-contained dwellings will be supported.

Applications for new buildings or sub-division of existing buildings into non-self-contained residential accommodation (HMOs) will only be permitted where the following criteria are met:

- i) The property is located within easy reach of sustainable transport and community facilities.**
- ii) An acceptable standard of residential accommodation can be provided that meets or exceeds the council's standards.**
- iii) The scale and nature of the use would not harm neighbourhood amenity, for example by way of noise, general disturbance, litter, on-street parking, or impact on visual amenity.**
- iv) To avoid an over-concentration of similar uses that could exacerbate deprivation, no more than 5% of the total dwelling stock within 100 metres of the application site should be HMOs; and the application does not sandwich a dwelling between two HMO properties.**
- v) The building is not within an area of significant deprivation.**

- vi) The proposal is not within or directly abutting a Core Tourism Investment Area, and would not otherwise adversely affect the character of holiday areas.
- vii) Adequate storage facilities are provided for cycles, waste, and recycling collection; and
- viii) There is supervision by a resident owner or manager, or an appropriate alternative level of supervision. Ongoing management will be secured through condition or s106 Planning Obligations where appropriate.
- ix) Where new dwellings (within Class C3) do not meet the above tests, the council will restrict the change of use to Class C4 (Small Houses in Multiple Occupation).

Community and Corporate Plan – Community and Place

Explanation

- 3.66 An HMO is a building or part of a building that is occupied as a main residence by more than one household, i.e. unrelated people who do not live together as a family but share some facilities such as a bathroom or kitchen. HMOs with more than 6 occupants are 'sui generis' and require planning permission. Small HMOs of 4-6 people fall within Use Class C4. These require planning permission where permitted development rights to change use have been removed, for example through an Article 4 Direction.
- 3.67 Planning control of HMOs is separate from housing legislation. The Housing Act 2004 defines licensable HMOs as 5+ occupants living in more than 1 household in buildings of three stories or more. Note that the existence of an HMO licence does not confer planning permission or imply that the use is acceptable in planning terms.
- 3.68 HMOs form 2.3% of Torbay's housing stock compared to a national rate of 1.6%. A proliferation of houses in multiple occupation, particularly where badly managed can worsen the serious urban deprivation that besets many coastal towns.
- 3.69 On this basis, 'sui generis' or Use Class C4 HMOs will be resisted where there are concentrations of deprivation or where a proliferation of such properties could be harmful to achieving mixed and balanced communities. As a guideline, where applications make up more than 5% of housing stock within a 100m radius, or where proposals are within the 10% most deprived neighbourhoods in the Indices of Multiple Deprivation, they are unlikely to comply with Policy H10

- 3.70 HMOs should meet an acceptable standard of accommodation to deliver a healthy living environment, This will be taken as those set out in: **Our standards for Houses in Multiple Occupation - Torbay Council**. This includes amenity, living conditions, space standards, waste and recycling provision.
- 3.71 HMOs should contain adequate provision for waste and recycling, cycle storage and resident amenity space. HMOs should seek to provide an area of 30-35 square metres per single bedspace. Communal areas such as lounges and kitchens may be counted towards to this space. Where permission is granted for HMOs, the council will require the property to be appropriately managed, either through an on-site manager or other arrangement that provides for 24 hour emergency cover. This will be secured through planning condition or s106 Planning Obligations, and a monitoring obligation sought.
- 3.72 HMOs will not be supported in Core Tourism Investment Areas and other key tourism locations where they would adversely affect the tourist economy. Unauthorised HMOs will be prioritised for enforcement action. Note that the Tourism Policies (especially TO3) have been drafted to support conversion of holiday accommodation into self-contained residential dwellings outside of CTIAs.
- 3.73 Policy H4 will apply to all HMOs. The council will use these Policy criteria in considering whether to pursue enforcement action against existing unauthorised HMOs. The Policy aims to reduce the number of poor-quality HMOs and to slow the growth in their number in the Bay, whilst acknowledging that well-run establishments can contribute to meeting a need for low-cost accommodation.
- 3.74 Note that Policy H10 does not apply to accommodation where significant care or ongoing support is provided by a charitable organisation. Such uses are dealt with in Policy H11 below.
- 3.75 The council will resist very large dwellings which are likely to be HMOs where they fail the tests of this policy. In Community Investment Areas (i.e. within the top 20% most deprived neighbourhoods), the council will restrict permitted development rights to convert Class C3 dwellings to Class C4 HMOs.

Strategic Policy H11: Specialist housing for people in need of care or support

The council will support measures to help people live independently in their own homes and to live active lives within the community.

This will be achieved through the following:

- i) All new dwellings should be capable of adaptation for disabled people, as far as is practical. All major developments should provide a minimum of 25% of all new homes to Building Regulations Approved Document Part M4(2) (accessible and adaptable dwellings) standard.
- ii) The provision of accommodation providing additional support and assistance to local care-experienced young people will be supported unless other policies in the Local Plan provide a strong reason for refusal.
- iii) Adaptations to assist people living with disability will be supported unless they conflict significantly with other Local Plan Policies. Where accommodation is provided for annexes for relatives or other dependants, the council will require accommodation to revert back to being part of the main dwelling when no longer needed for annex purposes, unless the annexe is suitable for residential accommodation according to the policies and obligations set out in this plan. {

Age Restricted Accommodation

- iv) Specialist and age-restricted accommodation (irrespective of use class) should be aimed at meeting the needs of local people, or those with a strong family connection. The occupation of specialist and age restricted accommodation will be restricted to people living in Torbay for a minimum of five years or with a direct family member living in Torbay. Exceptions to this will be provided where one or more of the following apply:
 - i) Specialist accommodation such as specialist dementia care and facilities etc. for Torbay residents with support of adult social care
 - ii) Affordable housing or institutions (including extra care managed by local lettings agreement)
 - iii) Where specialist accommodation is not restricted to occupation by people with a strong local connection, and (i)- (ii) above does not apply, the council will seek financial contributions via s106 Planning Obligations to meet likely local healthcare and social service costs generated by the development. This should reflect the average additional cost to Torbay Adult Social Care and the NHS arising from inwards migration of people likely to require additional care and support over the lifetime of the development.
- v) Specialist accommodation for older people or other people in need of care should be located within easy reach walking and wheeling distance of community facilities, places of worship, shops, and public transport. They

should be located on relatively level sites where possible. Proposals should show how they will promote social connectedness and reduce social isolation.

vi) **New care homes and other specialist accommodation, extensions to existing care homes and development of retirement villages will only be approved where:**

- a) Occupancy is restricted to local residents as per criteria 4 above.
- b) they will not harm the creation or retention of mixed and balanced communities.
- c) they will not add undue pressure on local healthcare or social services; and
- d) the accommodation leads to an improvement in the quality-of-care facilities provided especially the provision of specialist nursing or care facilities.

Where development, including residential development, places an additional need upon health services, community or other facilities, the council will seek financial contributions towards the funding of those facilities.

Explanation

- 3.76 A key issue that Torbay faces is an ageing population. By 2032, 30% of Torbay's population is projected to be aged 65 or older, up from 26% in 2022. This can bring considerable social and economic benefits to an area. However, it also raises significant health and accommodation issues and costs. In addition, there is a wide range of people with additional needs who may require some form of assistance to live independently. On this basis it is important that the provision of homes for older people assists with freeing up local housing stock for working age people and families. It will be important that new age-restricted housing does not lead to increased inwards migration of older people.
- 3.77 The overarching aim of Policy H9 is to assist people to live good-quality of life in their own homes for as long as possible, and supports adaptations and the appropriate provision of specialist accommodation.

- 3.78 Torbay's need for specialist housing was assessed by Housing LIN (Local Intelligence Network) in 2019 and is currently being updated. Preliminary evidence from the update indicates a large increase in older people living alone and the need to provide better specialist facilities; but a falling need for care home spaces offering no additional services
- 3.79 Torbay Council's and the Torbay and South Devon Healthcare NHS Foundation Trust's policy is to help people to live in their own homes for as long as possible. Adapting homes to provide facilities such as wheel chair access will not usually require planning permission, however a sympathetic view will be taken of people's needs in instances where permission is required. The creation of annexes for dependent relatives will be supported subject to design and neighbour amenity matters. It will usually be necessary that annexes are subject to a planning condition requiring planning permission to be sought for them to be used as a separate dwelling.
- 3.80 Age-restricted dwellings offering no additional facilities (sometimes referred to as sheltered housing) is likely to fall within use class C3, but subject to different space, parking and open space standards to general needs housing. Extra-care and supported housing providing additional care and facilities may fall within Use Class C2 or C3 but is still "housing" and liable for affordable housing under Policy H7.
- 3.81 The council recognise that there is a need for housing offering additional support and assistance for young people, including care experienced young adults and people with additional needs. These should be run by a recognised body such as a Registered Provider as affordable housing and provide additional support such as links to local employers' training agreements. Such dwellings may fall within Use Class C3(b) or sui generis depending on the number of residents and whether or not care is provided. Policy H11 seeks to provide a supportive framework for such accommodation, subject to other Local Plan considerations, particularly management arrangements and neighbour amenity.
- 3.82 Where an application is likely to lead to an increase in health and social care costs in the area, the council will seek s106 Planning Obligations to meet the additional cost to the area. This will not be sought where occupation is restricted to Torbay residents or people with a strong family connection. This will generally be taken to mean 5-years' or more residency or a direct family connection. In the case of affordable housing, occupancy will be managed via local lettings agreement at the discretion of the Head of Housing.

Policy H12: Proposals involving the loss of care accommodation

Proposals involving the loss of existing care accommodation will be supported where it is demonstrated that it does not represent the most appropriate way of delivering care, or it provides a type of accommodation that is not needed.

Proposals for change of use or redevelopment of care accommodation should achieve a good quality of residential accommodation.

Where such a change of use is agreed, the creation of family homes or employment space will be encouraged, and the council will seek the restoration of buildings by the removal of unsightly features or additions relating to their specialist use.

Community and Corporate Plan – Community and Place

Explanation

- 3.83 As set out in Policy H11 the majority of Torbay’s housing need, including specialist accommodation should be met by assisting people to live in their own homes including assisting them to down-size to age restricted and extra care dwellings. Nursing homes should provide for facilities such as dementia care or specialist facilities, and there is unlikely to be a need for care homes that provide no additional nursing or specialist facilities.
- 3.84 Properties converted into care homes, for example from Victorian Villas often lack facilities such as level access or ensuite accessible wet rooms. Policy H12 recognises that some care homes should convert, or be redeveloped, for residential purposes. This will allow need to be met through more modern purpose-built facilities.
- 3.85 Regard should be had to the design policies in the Local Plan in relation to the sympathetic conversion of older buildings, particularly the removal or improvement of unsightly features and additions.

Policy H13: Sites for travellers

The Local Plan will provide for a temporary negotiated stopping places for Travellers within Torquay Gateway and Collaton St Mary Future Growth Areas. Provision may

be made offsite, subject to suitable alternative sites being provided by the developer. These should have regard to the criteria below.

Other applications for caravan sites for travelling people, including residential sites for settled occupation, transit sites and temporary stopping places, will be assessed against the following criteria:

- i) Evidence of need for pitches for travellers or plot/yards for travelling showpeople.
- ii) The availability and suitability of accommodation on existing mobile home sites with licences for permanent occupancy.
- iii) Proposals should promote peaceful and integrated co-existence between the site and the local community. They should not be to the detriment of the amenities of adjoining areas in respect of noise and other disturbance arising from the movement of vehicles to and from the site,
- iv) Sites should be provided with a satisfactory means of vehicular access, together with adequate provision for turning, parking and stationing of incidental business vehicles on the site.
- v) Sites should be provided with an appropriate level of essential services including access to drinking water, refuse collection and sewage disposal.
- vi) Sites should be located within reasonable distance of local services and facilities (e.g. shops, schools, and hospitals).
- vii) Sites should not be located in areas at risk of flooding.
- viii) Sites will be acceptable outside the built-up area only if they are well-screened and do not conflict with landscape, nature conservation, countryside, and agricultural protection Policies in the Local Plan.
- ix) Proposals in rural or semi-rural settings, should ensure that the scale of such sites does not dominate the nearest settled community.

Community and Corporate Plan – Community and Place

Explanation

- 3.86 The government's Planning Policy for Traveller Sites was updated in December 2024 as a sister document to the NPPF. Where there is an identified need, councils should maintain a 5 year supply of pitches. Pitches may include:

1. Residential sites for settled occupation (with infrastructure including provision of sanitation and other services);
2. Transit sites (possibly with limited facilities); and
3. Temporary stopping places (with normally only basic facilities)
4. Plots or yards, for travelling show people with facilities to allow over-wintering and storage of equipment.

- 3.87 Torbay does not have a history of settled traveller or Romani Gypsy communities , or others with a heritage of travelling expressing a wish for pitches. Furthermore, there have been no planning applications for any type of sites in the Unitary Authority area.
- 3.88 The 2014 Gypsy and Traveller Accommodation Assessment (GTAA) in Torbay confirmed that no evidence existed that indicated a need for the council to make provision for permanent or transit site accommodation for travellers or travelling showpeople. However, there is a need to identify negotiated stopping sites.
- 3.89 However, the need for accommodation will be reviewed as part of the Plan preparation. In the event that a need for a permanent site is identified, the first preference will be in the built-up area in proximity to schools and other services. Torbay does have a significant stock of mobile home accommodation on the West of Paignton that is likely to meet demand for settled accommodation. If a need for local-need affordable pitches in the rural area is identified, Policy H13 will be the starting point for determining proposals.

Chapter 4: Building a prosperous and inclusive Torbay - Unlocking opportunity for all



Figure 11 Building a Prosperous and Inclusive Torbay

Introduction

4.1 The Local Plan supports a step change in the economic performance of the Bay, building on the recent signs of recovery and maximising the opportunities for regeneration. The National Planning Policy Framework (paragraphs 18-22) supports economic growth. Plans and decisions should support growth and to plan proactively to meet development needs. At the same time, many employment and commercial activities are outside the control of planning, particularly with the creation of a wide Class E commercial use class, and permitted development rights to convert many commercial buildings to housing.

4.2 This chapter is divided into three sections:

- Part 1: Economy and Employment Land
- Part 2: Tourism
- Part 3: Safe and Welcoming Town Centres for All (Town Centre and Retail policies)

Part 1 - Economy, Tourism and Town Centres

Economy and Employment Land

- 4.3 The Torbay Economic Growth Strategy was adopted by Torbay Council in 2023. This identifies a need to increase Torbay's productivity by broadening the economic base and reducing reliance on the service sector. The Economic Growth Strategy sets out how the council and its partners can improve economic conditions and help businesses to improve performance, create new opportunities for residents, tackle poverty and improve health outcomes.
- 4.4 The Local Plan recognises the importance of the hi-tech sector and knowledge-based economy. Torbay has specialisms in areas such as photonics, electronics, and medical technology. Many firms are reaching capacity and need grow-on space. There is a need to provide improved employment prospects and learning opportunities, and to provide better opportunities for younger people to stay in Torbay. This involves improving links with education providers such as South Devon College and providing improved prospects for local young people, especially those from care-experienced and other special education needs backgrounds. More details of the Economic Growth Strategy are available at: **[Economic Growth Strategy - Torbay Council](#)** and the Economy Topic Paper.
- 4.5 Torbay's Community and Corporate Plan prioritises inclusive economic growth, aiming to create opportunities for all residents. This section supports that ambition by focusing on job creation, skills development, and business resilience. The emphasis on high-tech industries and education partnerships reflects a commitment to long-term prosperity and social mobility. Investment in employment land and infrastructure is key to unlocking Torbay's potential and reducing deprivation.

The Local Plan supports the regeneration of Torbay and improvement in its economic performance, with the aim of achieving a step-change in economic prosperity as set out in Torbay's Economic Growth Strategy. Proposals that create or improve employment or enable expansion will be supported subject to other policies in the Plan.

The Local Plan proposes the creation of at least 80,000 sq. m. of new industrial space within Use Class B2/B8/ E(g), equal to at least 20 hectares of employment land. Additional provision will be made for healthcare and education where there is an identified need.

Phased delivery of mixed-use development must include early provision of serviced employment space, unless there are compelling reasons to justify later delivery, and safeguards to provide compensation in the event of non-delivery. The provision of local training and employment schemes will be supported.

Where planning permission is granted for Class E(g) or B2/B8 space the council will use conditions or seek a s106 obligation to ensure that the space is retained for employment purposes.

Community and Corporate Plan – Economic Growth

Explanation

- 4.6 The Local Plan sets out a positive spatial framework to support the economic prosperity aspirations of the Community and Corporate Plan and Economic Growth Strategy. Central to increasing Torbay's productivity and employment prospects, the Local Plan seeks to create a land use framework to support the maintenance and expansion of hi-tech industries identified in the vision in the Torbay Economic Growth Strategy, Community and Corporate Plan and The Torbay Story.
- 4.7 Whilst not an exclusive list, the following sectors are particularly important in Torbay:
- Tourism, hotel and catering
 - Manufacturing
 - Professional services

- Financial services
- Advanced electronics and photonics / hi-tech
- Medical / Healthcare
- Education and training
- Business Process Outsourcing and
- Food production and processing.

- 4.8 Policies ES and E1 set targets for the provision of employment land in Torbay. This is informed by the **Torbay Economic Development Needs Assessment (EDNA)** (DLP 2024) <https://www.torbay.gov.uk/council/policies/planning-policies/local-plan-update/economic-development-needs-assessment/> as well as the Torbay Economic Growth Strategy (2023). Based on the 2024 EDNA, the Local Plan seeks to allocate at least 20ha of employment land that should achieve at least 80,000sq m of net additional employment floorspace within Class E(g), B2 or B8 (i.e. traditional employment uses such as offices, light industry and high tech that would have fallen into Use Class B1 prior to 2021, Use Class B2 General industry and Use Class B8 Storage and Distribution). Policy E2 sets out site allocations. There is an emphasis on traditional former “Class B” jobs in these allocations due to the need to increase GVA and widen the areas industrial/high tech base. The Local Plan identified about 32ha of employment land in Policy E1, but makes an allowance for other uses including Class B8 and non-completions. This level of provision is more likely to deliver 80,000sq m of employment space rather than simply relying 20ha, which would be the requirement based on a typical 40% site coverage assumption (i.e. assuming that 1ha allocation yields 4000 sq. m. floorspace). The delivery of employment space will be kept under review in order to ensure that it delivers at least 80,000 sq. m. Class B2/B8/E(g) floorspace.
- 4.9 The 80,000 sq. m. employment space allocation does not include provision for education or healthcare jobs. Provision should be made for growth within these sectors, particularly at Torbay Hospital, South Devon College and other strategically important institutions. Development in Future Growth Areas should make provision for education and healthcare facilities in line with Policies SCS and SC1
- 4.10 Home working has become increasingly important, both because of flexible working arrangements, improvements to ICT and AI. This usually takes place as ancillary to the domestic use of properties, and there has not been an upsurge in demand for live-work units. However, the Local Plan seeks to accommodate the rise in home working through policies supporting to the door fibre (Policy IN2) and provision for vans as part of

residential layouts (See Policy TA4). The Local Plan also supports the provision of work hubs or start up units are part of the Class E(g) employment space offer.

Strategic Policy E1: Strategic employment land allocation

The following sites are proposed for employment use within Class B2, B8 or E(g), to meet the needs of existing, growing and new businesses.

Within these areas, a minimum of 50% (or 2000 sq. m. per hectare) will be provided as Class B2 or E(g) employment, subject to other policies in this Plan. Early delivery of serviced units of Class E(g) or B2 space will be sought. Where later delivery of B2 /E(g) units is proposed, a S106 phasing agreement will be required setting out safeguards including compensation for non-delivery of employment units.

Table 8 Local Plan Employment Allocations.

	Site	Site Size	Notes	Status
	Torquay			
E1T.1	Land at Orchard Way	1.5ha		
E1T.2	Adj. Ridge Lane and Moles Lane, Edginswell	3ha	23T003- New allocation. Land to the West of the Ring Road.	Proposed new allocation
E1T.3	Kingsland, Torquay	3.2ha	Allocated as part of SDT2 and shown on the Adopted Masterplan (2015) as employment. HELAA site 21T125. Application P/2019/0710 for 90 houses and offices refused/appeal dismissed.	Allocated in Local Plan 2012-30
E1T.4	Land adj. Kingsland Torquay	1.2ha	HELAA site 21T004	New proposed allocation

	Site	Site Size	Notes	Status
E1T.5	Former Market Site, Stantor Barton	1.3ha	HELAA site 21T136 Promoted for housing in the HELAA).	New proposed allocation
E1T.6	Riviera Way adj. Magistrate's Court	0.6ha	The site has outline permission P/2024/0511	
	Paignton			
E1P.1	Claylands Cross phase 2	2.4ha	Allocated site in Local Plan 2012-30 (SDP1/SDP3) Permissions P/2016/1115, P/2016/1123, P/2018/0700, P/2020/0187 2022/0027 Hybrid permission 11,188 sqm B2/B8 floorspace (10,788 sq. m +400 sqm approved under P/2018/0700 in 2 units. Unit 1 built out (5,600sq m). Outline permission for phase 2. (Circa 5,600 sq. m).	Allocated and committed site. 5,574sq m built; outline permission for phase 2 (circa 5,035sq m).
E1P.2	Land at Yalberton Road/Berry Acres	1.7ha	Berry Acres Development allocated for business use, rear of Yannons Farm. Part of a mixed-use site approved as P/2014/0983. The housing has been built. P/2014/0983 and P/2018/0977, P/2019/0605, P/2019/0173. Circa 7,400sq. m of employment. S106 plan shows three fields at north of site for employment	Allocated site with outline permission. 1ha likely to be deliverable.

	Site	Site Size	Notes	Status
			(0.68ha +0.98ha+ 0.431 ha). (Plus a separate plot at Wilkins Drive - see below). Part of the land used for sustainable drainage and access. So likely to be middle portion of land circa 1ha that is deliverable. The site is close to proposed waste operation at Yalberton, but is suitable for employment use.	
E1P.3	Wilkins Drive, Yannons Farm	1.3	Standalone part of Berry Acres (Jackson Land). Access strip controlled by local housebuilder being. The site is being promoted for housing. Allocated site in Torbay Local Plan 2012-30 SDP3.4 If it comes forward as housing, there would need to be compensation for loss of employment land unless another social benefit is provided e.g. affordable housing in excess of policy requirement.	Allocated site in Torbay Local Plan 2012-30. Outline permission – but being promoted for housing
E1P.4	Land north of Wilkins Drive PMU	1.5ha	21P034 in HELAA	New proposed allocation
E1P.5	Land at Long Road/Lower Yalberton Farm Holiday Park .	4.7ha	21P012 (south of 21P067) - promoted to the HELAA as housing/mixed use development.	New Proposed allocation
E1P.6	Land at Devonshire Park Long Road	(Circa 0.7ha)	Allocated / part of outline P/2014/0947. 5,547 sq. m of Class B1/B8.	Existing allocation with permission. Not being actively

	Site	Site Size	Notes	Status
			M 1,120 sq.m. 12,000 sq ft)	
	Brixham			
E1B.1	Oxen/Freshwater Cove	0.9ha	Allocated in BPNP and Local Plan 2,7500 sq. m Class B2, B8 and E with specific focus on supporting maritime and fishing industries. Total site is 1.8 but 0.9ha assumes retention of car park.	Existing allocation with no historic permission
E1B.3	Northern Arm Breakwater		Subject to Environmental Impact Assessment	Existing allocation rolled forward.
	Total	32.3ha		

Community and Corporate Plan – Economic Growth

Explanation

4.11 Policy E1 proposes employment allocations. The main focus of these should be on providing employment space within the “industrial” use classes which are needed to support Torbay’s key employment sectors such as photonics and MedTech, as well as the Bay’s Marine economy. There is an emphasis on the following use classes to support these sectors:

- B2 General Industry
- E(g)(i) Office
- E(g)(ii) research and development
- E(g)(iii) any industrial process which can be carried out in a residential area.

- Limited Class B8 Storage and distribution where necessary to support key industries or the wider economy.

- 4.12 The table above provides around 32 ha, but not all of the areas are likely to be suitable for employment development at 40% site coverage and some are subject to alternative proposals. Delivery of employment land will be kept under review to ensure that at least 80,000 sq. m. of B2/E(g) floorspace is delivered early in the Plan period.
- 4.13 Where proposals are part of wider mixed-use areas, such as Future Growth Areas, there should be a value-equalisation agreement over the site where practicable to assist with the delivery of employment areas. Development should be phased to ensure early delivery of employment areas.
- 4.14 Proposals for non-employment use of these allocations will be resisted, subject to the considerations in Policy E4 below. The council recognises that there is likely to be limited demand for new office space, and proposals should avoid this as an element of mixed-use developments, unless supported by clear evidence that it is deliverable.
- 4.15 Employment sites should be suitable for modern users and not unduly constrained by operational requirements. Care will need to be taken when locating employment next to residential development, and areas should be master planned to accommodate employment use. Advice on the needs for employment space, layout etc. is available from the Economy Team.

Policy E2: Employment area renewal and modernisation

The refurbishment and improvement of the existing employment estates will be supported subject to other policies in this Plan. Development should not result in a net loss of Class B2/E(g) floorspace, unless the quality of employment space is significantly improved. A proactive approach will be taken to bringing underutilised space into productive use.

Other uses, including residential development will be supported where it achieves an overall improvement in the provision of high quality employment space or substantial public benefits, and does not sterilise the area from employment or undermine existing industrial uses.

Table 9 Existing Employment Areas

Site	Notes
Torquay	

- 4.17 Whilst the emphasis is on the retention of industrial and hi-tech uses, it is recognised that some uses such as “trade counters” and car showrooms already operate in these areas, and that other non-industrial (i.e. outside of former Class B) uses may be appropriate in these areas, subject to Policies TCS and TC5 dealing with the town-centre first approach for main town centre uses.
- 4.18 Further Masterplans will assist the regeneration of industrial land and identify opportunities for mixed use development. Where mixed use developments are approved, the delivery or enhancement of employment space will be required through phasing agreements and land equalisation measures.

Strategic Policy E3: Supporting a sustainable marine and coastal economy

The council will support investment in marine-related development where this produces economic, social or environmental benefits to the area. Proposals should be consistent with wider natural and historic environmental, including marine environment, and coastal defence objectives. Sites of importance to marine-based activities will be protected for such use, subject to the other Policies in the Local Plan.

The following schemes are proposed:

- An extension to Torquay Harbour
- Improvements to Paignton Harbour
- Construction of Brixham Northern Arm Breakwater

Proposals must demonstrate that there would be no adverse effect on the integrity of any European site through a Habitat Regulations Assessment (see also Policy NCS2).

Proposals should be consistent with South Marine Plan to ensure integrated marine and terrestrial planning is delivered for Torbay.

Community and Corporate Plan – Economic Growth

Explanation

- 4.19 The Local Plan places very great emphasis on achieving urban regeneration to support economic growth and provide housing opportunities. Policy E3 sets out a supportive framework for employment uses that require a maritime location, particularly those related to harbourside and waterfront improvements and the fishing, tourism, and related marine industries.
- 4.20 Tor Bay is a beautiful natural harbour which provides a protected area of water for leisure, recreational, tourism and commercial use. The coastline and the harbours are a vitally important resource for the community and economy. Torquay, Paignton and Brixham each have working harbours, with Brixham Harbour being the largest fishing port in England and Wales, in terms of the value of catch.
- 4.21 The Bay is part of the Lyme Bay and Tor Bay Special Area of Conservation (SAC). Tor Bay is also designated as a Marine Conservation Zone (MCZ) and contains several geological Sites of Special Scientific Interest (SSSIs). The coastline provides a flood defence for low lying coastal areas.
- 4.22 Torbay's unique coastal setting offers potential to support economic regeneration through investment in marine-related development. A number of such projects are identified in the Tor Bay Harbour Authority Port Masterplan Addendum (2019). Accordingly, sites that are of importance to the marine economy will be safeguarded for such use.
- 4.23 All marine-related development must avoid harm to marine biodiversity, geodiversity, human health and the wider environment.
- 4.24 Proposals must demonstrate that air quality, noise, vibration and water quality impacts have been taken into account and that any such impacts are minimised and mitigated sufficiently. This includes physical impacts such as, contamination and non-toxic changes (for example to salinity, turbulence nutrients and organic matter), as well as minimising the impacts on wildlife through piling, noise or other disturbance. Many marine species are protected by wildlife legislation, and a licence may be required to carry out works affecting marine species or their habitats.
- 4.25 Marine related developments are likely to require an Environmental Impact Assessment (EIA) and Habitats Regulation Assessment (HRA) or screenings to be carried out at the application stage. Development that is likely to have a significant effect on the Lyme Bay and Torbay Marine SAC can not be permitted unless an Appropriate Assessment has ascertained that following mitigation, there is no adverse effect on the integrity of the site, taking a precautionary approach (see also Policies NCS1 and NCS2). Only as a last resort, in highly exceptional cases where there are no less harmful solutions, and the development is required for Imperative Reasons of Overriding Public Interest, will compensation for adverse impacts be permitted. Proposals likely to impact the protected features of the Torbay Marine Conservation Zone will require an MCZ assessment.

- 4.26 The council will work with the Marine Management Organisation when considering marine development, especially where developments may also require a Marine Licence. Torbay, sits within the jurisdiction of the South Marine Plan area.
- 4.27 Visual, cultural, historical and archaeological impacts should also be considered. Torbay has an important maritime history; all three harbours are recognised as designated heritage assets and form the focal point of their surrounding conservation areas. Policies HES and HE1 are relevant when considering historic assets.
- 4.28 Marine activities and development should not prejudice the interest of defence and national security, and the MoD should be consulted accordingly. Development will need to be safe over its planned lifetime and not cause or exacerbate flood and coastal erosion risk elsewhere.

Policy E4: Safeguarding strategic employment land (proposals involving the loss of employment land)

Proposals for the loss of existing or allocated employment space will be considered on the basis of the impact on the economic prosperity of Torbay, the appropriate mix of uses within a locality, and on the amenity of people in the area.

The loss of sites that provide employment of strategic importance to the Bay's key economic sectors will be resisted.

Within allocated sites in Policy E1, Proposals that result in the net loss of employment space will be refused unless it is demonstrated that the proposal results in a significant public benefit that cannot be achieved elsewhere in Torbay, and that there would be no adverse effect on the retention of existing employers in the Bay.

Where it is demonstrated that there is no reasonable prospect of a site being used for other (Class B2, B8 or E(g)) employment purposes, or such a use would conflict with the Local Plan, alternative uses that provide wider sustainable local communities will be supported.

Where the proposed loss of employment space is agreed, the council will seek financial contributions to compensate for the loss of employment.

If planning permission is granted for E(g) space the council may restrict permitted development rights for change of use to residential, in order to protect key economic sectors.

Explanation

- 4.29 The Community and Corporate Plan and Economic Growth Strategy do not wish Torbay to become a commuting or retirement resort. It is therefore important that opportunities for employment are protected, and sufficient land retained to meet the demand of existing and new companies.
- 4.30 Whilst the number of people in Torbay with jobs has increased since 2001, the number of Torbay based workplace jobs has remained relatively static.
- 4.31 Torbay's high levels of deprivation stem primarily from low wages and poor employment prospects, rather than abnormally high property prices per se. The hi-tech elements of the local economy are identified by the Economic Growth Strategy as key to raising GVA. There is also a national dimension that such industries are important to the economic prosperity of the country especially in the face on uncertain global events.
- 4.32 Accordingly, Policy E4 seeks to retain employment space for employment purposes, subject to a "reasonable prospects" test. Applications for non-employment use must be supported by proportionate evidence that there is no reasonable prospect of employment use. This may include details of marketing including to the council, or seeking funding support for matters such servicing and infrastructure provision.
- 4.33 Where loss of employment is deemed acceptable in principle, a S106 obligation will be sought to compensate for the loss of employment and will be used to support the delivery of jobs, infrastructure or local training facilities elsewhere in Torbay.
- 4.34 Note that Policy E4 relates to a net loss of jobs. It will not be applied where proposals are likely to modernise or make better use of employment space, and are thereby likely to improve employment opportunities; although the council will still seek local skills and training agreements in line with Policy E5.
- 4.35 Policy E4 seeks to protect a stock of employment space broadly within the hi-tech and industrial uses. Proposals for the loss of employment within town centres, holiday accommodation or retail will be considered on the basis of policies in those sections of the Local Plan (see Policy TC7). However, where a non B2/B8/E(g) building located within an industrial area/trading estate becomes available, the council will seek to retain/revert its use for industrial on the basis of the above policy tests.
- 4.36 The council recognise that employment land enjoys a range of permitted development rights and that some changes of use fall outside of planning control.

Policy E5: Education and Local Employment Partnerships

The council will support initiatives and development that improve skills and links between work and education, particularly through cooperation with local partners.

Applications for major development should be accompanied by an Employment and Skills Plan, proportionate to the scale of the development. The council will promote and encourage links to local education providers, apprenticeships and other measures to support people into work from the local area.

Community and Corporate Plan – Community and People

Explanation

- 4.37 Policy E5 promotes local training arrangements, placements and apprenticeships, to maximise the benefits of development to the local economy. It is important that measures are put in place to support people in Torbay to learn and retain the skills needed by growing and new businesses.
- 4.38 The council recognise the role of key worker and self-build housing to strengthening links between work and skills, and housing. Policy H7 seeks a proportion of affordable housing to be provided on larger development sites.
- 4.39 The council is unable to require the use of local labour. However, it will encourage developers to employ local people where it is practical to do so. This is particularly the case in schemes where an element of 'exception' to planning policies is made in order to permit development. For example, developers will be encouraged to use employment and skills plans to better establish links between education and employment. Advice on the content and scope of Employment and Skills Plans is available from the Economy Team.

Part 2 - Tourism



Figure 12 Tourism

Introduction

4.40 Torbay has a fantastic brand – the English Riviera – and is a world class tourism destination. In 2023, Tourism contributed over £431 million to Torbay’s economy. Tourism accounts for about 15% of all employment in Torbay: about 6,520 full time equivalent jobs directly and a further 2100 FTE jobs indirectly. There are some very positive signs of a changing tide for tourism. The need to modernise the tourism sector and “Turn the Tide” on the decline that has beset may coastal resorts has been part of planning policy for several years. The tourism economy has been hit hard by the early 2020s and cost of living challenges. Despite this, there have been several hotels opened in Torbay over the last decade, which is likely to have led to a small increase serviced bedspaces (i.e. hotels and guesthouses) from around 13,300 in 2012 to 14,300 in 2023 (South West Research Company).

- 4.41 The Torbay Community and Corporate Plan notes that Tourism is a vital part of Torbay's identity and economy, and the Community and Corporate Plan recognises its role in creating inclusive opportunities. This section supports the Plan's ambition to make Torbay a premier destination while ensuring that all residents benefit from its success. By focusing on modernisation and investment in Core Tourism Investment Areas, the Local Plan aims to deliver high-quality experiences and facilities. This approach also supports year-round economic activity and community wellbeing.
- 4.42 Tourist accommodation is key to the success of tourist resorts. The **English Riviera Destination Management Plan** updates this strategy for 2022-30 and is part of the wider Torbay Economic Growth strategy. The Management Plan recommended a bedspace reduction of about 2% between 2022-27. This is currently being refreshed. However, the general approach of encouraging modern accommodation including hotels in prime locations whilst allowing change of use of less well located or outdated accommodation to residential use is likely to continue.
- 4.43 All three towns contain important Waterfront and harbourside areas. Brixham and Torquay also contain marinas. These are within the Core Tourism Investment Areas (CTIAs), and tourism, leisure maritime investment in these areas is supported. Brixham is a major fishing port and supporting the fishing industry is important to the Bay's economy, and relevant to its seafood specialism. Tor Bay is environmentally very important, being designated as a Marine Special Area of Conservation and National Nature Reserve. The Local Plan seeks to balance the internationally important environment with the area's economic needs.
- 4.44 The definition of "tourist" is not always straightforward. For the purpose of this chapter a tourist is defined as person or group visiting on a temporary basis and not staying in their sole place of abode. It can include domestic and international holiday makers, language students, business travellers and travelling workers (who have another home). It does not include people who have no other home. Accommodation for such people is likely to fall into Class C2 (if its purpose is to provide care), C3 dwelling house, C4 Small HMO, or Sui Generis (HMOs, hostels and other accommodation within its own class). Such uses are not tourist accommodation.

Strategic Policy TOS: Sustainable tourism and cultural investment strategy

Torbay's tourism offer will be developed in a sustainable manner to enhance its role as a premier tourism destination. Tourist facilities and accommodation will be

improved and modernised, and new tourism facilities provided. Sustainable tourism will be actively encouraged.

The quality of accommodation will be improved with a wider range of new and refurbished facilities and services. This will be achieved through the following measures:

- i) Supporting the improvement of existing and provision of new tourist accommodation, attractions and facilities, subject to other policies in this Plan. In particular proposals that make positive use of Torbay's marine environment, culture, heritage, biodiversity and Geopark will be encouraged.
- ii) The retention, improvement and creation of new, high quality tourism and leisure attractions, facilities, and accommodation in Waterfront areas and Core Tourism Investment Areas (CTIAs), as key focal points for investment in tourism:
 - i) Babbacombe Downs
 - ii) Torquay Harbourside, waterfront and Belgrave Road, Torquay
 - iii) Seafront, harbourside and Green Coastal Park, Paignton
 - iv) Goodrington, Paignton
 - v) Harbourside and waterfront, Brixham
- iii) Allowing poorly located and outmoded accommodation located outside of CTIAs to revert to decent self-contained dwellings, subject to the holiday character of the area and range of facilities offered not being undermined; and there being tangible regeneration and improvement to the fabric of the built environment and character of the area.
- iv) Resisting the provision of small apartments, hostels, houses in multiple occupation (HMOs) or other incompatible uses in tourism areas.

Community and Corporate Plan – Pride in Place

Explanation

- 4.45 Policy TOS provides a spatial context for the tourist economy. The Policy seeks to maintain and enhance the most important tourism areas as Core Tourism Investment Areas (CTIAs), which are shown on the Policies Map.

- 4.46 Policy TOS provides a supportive framework to tourism in general, particular within the designated Core Tourism Investment Areas. Tourism and leisure investment will be given substantial weight in CTIAs. Torbay's marinas are also included within the CTIAs. The Policy also recognises the need to focus on modernising the key areas, and the role that more marginal areas can play in providing a source of brownfield housing. Although it goes further than land use planning, CTIAs should be protected for tourism use by council wide decisions, including interdepartmental enforcement action on problem uses.
- 4.47 Torbay's tourism strategy is closely aligned with the Community and Corporate Plan's vision for a vibrant, inclusive and sustainable economy. By focusing investment in key waterfront and cultural areas, the Plan aims to enhance the visitor experience and support local businesses. It also recognises the importance of protecting the character of tourism areas while enabling regeneration. This balanced approach ensures long-term benefits for residents and visitors alike.
- 4.48 Not all areas within CTIAs are suitable or proposed for development. For example, they contain areas of significant natural or historic environment importance. This will need to be taken into account when considering proposals, particularly where they affect the Marine or South Hams Special Area of Conservation.

Policy TO1: Supporting tourism and leisure infrastructure (Proposals for new and safeguarding of existing tourism and leisure facilities).

Improvement of existing and the development of new tourist/leisure facilities and attractions, particularly all-weather facilities, will be supported subject to other local plan considerations.

Tourism and leisure facilities will be protected for tourism purposes, proportionate to their economic, social and cultural value to their tourism and leisure economy. Proposals for change of use or redevelopment of venues should demonstrate robust evidence of marketing. Where an element of non-tourism or leisure development is allowed, it should contribute significantly to the viability of the area or regeneration of the resort.

The tourism and leisure value of country parks should be conserved and enhanced

The provision of enhanced tourism and recreation facilities at Broadsands are proposed, respecting the important environmental assets of the area, to serve as a suitable alternative natural greenspace to relieve recreational pressure on Berry Head.

Explanation

- 4.49 Supporting existing facilities such as theatres, music venues, attractions etc, and promoting high quality all year round new facilities is vital to ensure a successful tourist economy. Policy TO1 provides an overarching policy to protect tourism and leisure facilities. Many tourism and leisure uses, including eating and drinking are “main town centre uses”. Policy TO1 encourages the improvement and provision of such facilities in CTIAs. When considering proposals for such facilities, their value for the tourist economy will be an important material consideration.
- 4.50 However, policy TO2 recognises that some important leisure facilities are located outside of CTIAs and town centres, and sets a framework to protect them proportionate to their economic, environmental and cultural value. Areas such as Cockington, Ocombe and Berry Head Country Parks are not designated as CTIAs, but have significant value for tourism because of their focus for rural crafts and green infrastructure. Policy GIS deals with policy in Country Parks. Significant attractions such as Kents Cavern and Babbacombe Model Village fall outside the boundaries of CTIAs.
- 4.51 Whilst the list is not exhaustive, the following attractions are considered to be of significant importance to Torbay’s tourism offer:
- All of Torbay’s beaches and waterfronts
 - Babbacombe Model Village
 - Babbacombe Cliff Railway
 - Bygones, Babbacombe
 - Cockington Manor, Crafts Centre and Country Park
 - Kents Cavern, Torquay
 - Torre Abbey
 - Torquay Museum
 - Hollywood Bowl
 - Music venues in the harbourside and waterfront area (including but not limited to The Arena and The Foundry)
 - Beacon Cove (former Living Coasts)

- 4.52 It is noted that many of these attractions are also covered by other designations, in particular Kents Cavern, Torre Abbey, Battery Gardens and Berry Head fortifications are Scheduled Monuments. Berry Head is also particularly environmentally important as a Special Area of Conservation designated for its Greater Horseshoe Bat colony and calcareous grassland. The Local Plan proposes several Suitable Alternative Natural Greenspace to reduce recreational pressure on Berry Head. It is noted that Torbay's waters have important environmental constraints including the Marine SAC and important seagrass beds. Proposal must enhance and improve protection and interpretation of these assets. Where development in Torbay is likely to generate recreation pressure on Berry Head, developer contributions will be sought to provide mitigation, including to help fund suitable alternative natural greenspace (SANGs).

There is a presumption that the tourism role of Core Tourism Investment Areas (CTIAs) will be retained and enhanced. The development of tourism accommodation and facilities in CTIAs will be supported, subject to other local Plan considerations. The change of use of accommodation or facilities to non holiday uses within CTIAs will only be supported where:

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- ii) It lacks an appropriate range of facilities and scope for improvement to meet modern standards; and
- iii) It is demonstrated that there is no reasonable prospect of the site being used or redeveloped for tourism or tourism related purposes, taking into account historic and built environment, amenity and other material considerations.

Non-tourism development or uses will only be permitted in CTIAs where they are compatible with the tourism character of the area. They will not be supported where they would introduce incompatible uses or accommodation that would detract from the holiday character or place pressure on nearby holiday business to curtail their operation.

Where a change of use away from tourism is permitted, there will be a requirement to restore or enhance buildings or land by the removal of unsightly features, signage, clutter and extensions relating to the holiday accommodation use. Where appropriate there will be a requirement to reinstate amenity space, and permeable surfaces. A high priority will be given to restoring the character and appearance of buildings within conservation areas.

Community and Corporate Plan – Pride in Place

Explanation

- 4.53 Policy TO2 deals with proposals affecting Core Tourism Investment Areas. It reinforces the intention of Policy TO1 to retain CTIAs as the heart of Torbay's tourism offer. CTIAs were reviewed as part of the current Local Plan Update, but only small adjustments to the previous Local Plan 2012-30 were identified as being required at this time. A much more drastic reduction of CTIA boundaries took place as part of the preparation of the previous Torbay Local Plan 2012-30, (which also rebadged them from their former Principal Holiday Accommodation Areas). CTIAs account for less than 20% of Torbay's serviced accommodation, but do contain most of the key hotels.
- 4.54 It is noted that some parts of the CTIAs are in need of investment and regeneration. However, CTIAs are focussed upon Waterfront and key tourism locations whose success is critical to Torbay's tourism economy. Neglect or underinvestment will not be treated as a reason for granting permission for non-tourism uses. The prevailing use in these areas should be for tourism or leisure. Change of use or redevelopment for non-tourism purposes is likely to significantly and demonstrably conflict with the Local Plan unless it achieves substantial regeneration or other benefits. The council will support regeneration

and tourism promotion in CTIAs. It will also target enforcement at unauthorised uses and development which detract from the character of these areas.

Strategic Policy TO3: Redevelopment and reuse of holiday accommodation outside Core Tourism Investment Areas (as shown on the Policies Map)

The change of use or redevelopment of holiday accommodation or facilities outside Core Tourism Investment Areas will be supported where:

- i) The holiday character of the area and range of facilities and accommodation offered in Torbay are not significantly undermined, and
- ii) The redevelopment or change of use achieves regeneration, improvement to the built environment, and the provision of self-contained housing that meets space standards set out in Policy DE3

Proposals should avoid the loss of access to open areas previously accessible to the public.

Proposals for small apartments, hostels, and houses in multiple occupation (HMOs) or other incompatible uses will not be permitted where they would conflict with the tourism character and offer of the Bay or increase concentrations of deprivation or introduce other incompatible uses (see also Policies H10 HMOs and SCS).

Where a change of use away from tourism is permitted, there will be a requirement to restore or enhance buildings or land by the removal of unsightly features, signage, clutter and poor quality extensions relating to the holiday accommodation use.

Where appropriate there will be a requirement to reinstate amenity space and sustainable drainage features. A high priority will be given to restoring the character and appearance of buildings within conservation areas.

Community and Corporate Plan – Community and Place

Explanation

- 4.55 The English Riviera Destination Management Plan recognises a continued need to reduce and modernise the stock of holiday accommodation, whilst retaining good quality accommodation and protecting the area's status as a premier resort. Whilst there remains a demand for a broad range of accommodation, evidence of occupancy suggests that

there is scope to reduce the number of traditional guest house and small hotel type accommodation.

- 4.56 Policy TO3 deals with proposals outside designated CTIAs. It sets a much more relaxed approach to allowing change of use or redevelopment of holiday accommodation outside of CTIAs. However, where holiday accommodation offers a range of facilities not available elsewhere in the area, or is within a key tourist setting, Policy TO3 seeks to retain the holiday use. Instances where this is the case are likely to be relatively rare, but are likely to include the Former Palace Hotel, Babbacombe, where redevelopment of the Victorian Bishop's Palace and enabling residential development has been approved specifically to support retained tourism use on the footprint of the former hotel. Policy TO3 also seeks to retain open areas previously accessible to the public available for public enjoyment.
- 4.57 Policy TO3 does not require proposals to show that they are not viable for tourism use (unlike in CTIAs, where a "reasonable prospects test remains in place). However, neglect or underinvestment will not on their own be sufficient reasons to grant planning permission away from tourism use. Conversely, outside of CTIAs, the council will consider the intrinsic merits of the property and location and will not penalise past investment in otherwise unexceptional accommodation.
- 4.58 Residential use of holiday apartments must provide an acceptable standard of accommodation, having regard to Policy SCS and DE3, and not introduce discordant uses into areas that retain a holiday function. The council's starting assumption is that residential uses and holiday uses can coexist, but Torbay's key industry is tourism and the introduction of residential uses into tourism areas should not place undue pressure on remaining tourism or leisure facing businesses to curtail their use.
- 4.59 Where a change of use results in the loss of employment, the council will seek s106 Planning Contributions to mitigate this impact, as set out in Policy TO7. This will be focussed on improving the tourism economy, and the character and appearance of the area.
- 4.60 Some hotels and guesthouses have accrued unsightly clutter, signage or extensions that would not be currently permitted. The removal of such features will be sought as a condition of granting planning permission for a change of use. This will be particularly relevant for proposals affecting conservation areas and listed buildings. Proposals for redevelopment should also take into account the historic environment policies in Chapter 10 of this Plan.
- 4.61 As a minimum, in all areas, cosmetic features such as signage and awnings should be removed when conversion to residential use takes place. Many hotels/holiday flats comprise Victorian buildings with large C20th extensions which were permitted because of their contribution to tourism rather than their design. Where feasible the council will seek

to remove unsightly features such as flat roof extensions, box dormers etc, particularly in conservation areas. In many cases their replacement by more in-keeping buildings will be appropriate. However, it cannot be assumed that like-for-like replacement will be acceptable if the site has been over-developed when judged against modern standards. If the removal of unsightly features is considered to undermine the viability of development, an independent assessment of viability may be sought. The council will seek to negotiate an acceptable design solution that improves the visual appearance of the building, and may agree to relax other s106 Planning Obligations to assist viability.

Policy TO4: Flexible use of holiday apartments and accommodation (excluding holiday parks)

Within Core Tourism Investment Areas, self-contained holiday accommodation will be restricted to tourism use. Change to non-tourism occupancy will not be supported unless such a change achieves significant regeneration, built environment or tourism improvements.

Outside Core Tourism Investment Areas, the council will not seek to restrict the use of self-contained holiday apartments to tourism use, unless there are strong tourism related reasons for doing so, and where accommodation meets a reasonable standard in relation to size, light, amenity, privacy, thermal efficiency and flood risk. Where holiday occupancy conditions are removed, the council will seek development contributions to address the net additional impact arising from residential use.

Community and Corporate Plan – Pride in Place

Explanation

- 4.62 Some of Torbay's holiday accommodation is self-contained holiday apartments. South West Research Company figures suggest around 1130 units of self-catering accommodation, although this does not include Airbnb, second homes and other temporary use of residential accommodation for holiday use. The main approach of Policy TO4 is to allow greater flexibility of use outside CTIAs to use holiday apartments and accommodation either for residential or holiday use. Within CTIAs their holiday use will be regulated more closely.
- 4.63 Planning law on the status of holiday apartments is not entirely clear, and depends on a range of factors such as the range of facilities offered, degree of holiday use etc. Suites of

rooms and even self-contained flatlets within hotels – often called “Apart hotels”- will fall within Class C1. However, holiday flats and dwellings used for holiday purposes typically fall within Use Class C3 “Dwellinghouses” in England. The government has proposed to introduce a new use class C5 for short term lets that are not used as a sole or main home, with likely permitted development rights for use of a dwelling (class C3) for limited short-term occupation. However, these changes have not (at November 2025) come into force.

- 4.64 Policy TO4 sets out criteria relating to proposals for holiday apartments, or for the removal of occupancy conditions/ change of use to allow holiday apartments to be used for full time occupancy.
- 4.65 Within Core Tourism Investment Areas, the starting point is that holiday accommodation should be conditioned for holiday occupancy (tourism) usually through planning condition or by making it clear that accommodation falls within Use Class C1 (and not C3 or sui generis). Unfettered occupancy within CTIAs will only be allowed where the relaxation would facilitate significant regeneration or other public benefits and unlock investment into the area. In such instances, regard will be had to possible “agent of change” issues and full residential use will not be approved where there this is likely to sterilise tourism use e.g. through noise complaints or objections to the operation of nearby tourism attractions, music or facilities. The council will need reasonable reassurance that it will not be called upon to pursue action that would undermine the reasonable tourism operations of tourism within CTIAs when considering proposals for residential use in CTIAs.
- 4.66 Outside of CTIAs, the council will not usually impose holiday occupancy restrictions on holiday apartments, other than in special circumstances: for example, where residential accommodation would not be otherwise approved. Such accommodation is likely to be liable for affordable housing and other residential S106 requirements and these will only be relaxed where a S106 is entered into undertaking to provide them in the event that holiday use ceases.
- 4.67 Where occupancy is restricted to tourism use, the council will require a monitoring contribution to ensure its occupation for tourism purposes.

Holiday Centres and Parks

Policy TO5: Refurbishment or Upgrading of Existing Holiday Parks and Proposals for extensions or new Holiday Parks

Refurbishment or Upgrading of Existing Holiday Parks

Proposals for the refurbishment or upgrading of existing holiday parks, including chalets, caravans and camping sites will be supported where:

1. It contributes to the modernisation and improvement to the tourist economy; and
2. The development does not have an adverse impact on the landscape conservation, nature conservation, water management and agricultural characteristics of the area or involve the loss of best and most versatile agricultural land; and
3. The requirements of Policy NCS2 are met and there is no likely significant effect on a European Site, in particular the South Hams SAC.
4. The proposal is acceptable in terms of flood risk and does not lead to risk of down-stream flooding.
5. The development is acceptable in terms of transport, access and safety considerations; and
6. The proposal does not adversely affect the amenities of any adjoining residential areas.
7. The use will be restricted to holiday use and a monitoring contribution sought to monitor the ongoing tourism operation, to prevent residential occupancy.
8. Where other uses would not be appropriate, a site restoration condition or obligation will be applied requiring the site to be restored to its original condition and use should tourism use cease.

Proposals for New, or extensions to existing Holiday Parks

Proposals for new holiday parks, including chalet, caravan and camping sites will, commercial only be approved where all of the following criteria are met:

- i) The proposal is not in a sustainable location for residential development.
- ii) The proposal meets the requirements of Policy NCS2 and there is no likely significant effect on a European Site, in particular the South Hams SAC.

- iii) The development does not have an adverse impact on the landscape conservation, nature conservation and agricultural characteristics of the area or involve the loss of best and most versatile agricultural land; and
- iv) The proposal does not adversely affect the amenities of any adjoining residential areas.
- v) The use will be restricted to holiday use and a monitoring contribution sought to monitor the ongoing tourism operation, to prevent residential occupancy.

A site restoration condition or obligation will be applied requiring the site to be restored to its original condition and use should tourism use cease.

Community and Corporate Plan – Community and Place

Explanation

- 4.68 South West Tourism Company data indicates that in 2023 there were about 1740 static caravans or chalets in holiday parks, and 1290 touring pitches in Torbay. The facilities provided by holiday centres and parks offer an important source of holiday accommodation, particularly in Paignton and Brixham. As with serviced accommodation, there has been a general move to provide more modern facilities and accommodation in holiday parks. Holiday Parks fall outside of CTIA designations but are still important to the tourism industry. Policies TO5 and TO6 set out considerations for proposals affecting holiday parks. They seek to support investment in existing parks, subject to landscape, ecological and other considerations.
- 4.69 Holiday parks tend to be located in countryside areas and other environmentally sensitive locations. The Local Plan recognises the need to modernise and upgrade facilities so that holiday parks continue to meet modern requirements. Accordingly, it seeks to support the investment in holiday parks subject to other environmental considerations. Brixham remains a popular destination for holiday parks. However, development in this area is already close to the boundary of the South Hams Special Area of Conservation and within the South Devon National Landscape. Accordingly, new uses or buildings will only be permitted where proposals have demonstrated that they would have no likely significant impact, alone or in combination on the South Hams SAC. This will also require mitigations of additional recreational pressure on Berry Head or the marine environment.

Policy TO6: Change of use or redevelopment of existing holiday parks to non-tourism uses

Unless proposed for alternative development in the Local Plan or other development plan document, the change of use or redevelopment of existing holiday centres, chalets, caravans and camping sites to non-tourism uses only be supported where;

- i) the site is not in a prime location for holiday use (i.e. coastal, rural or close to major tourist attractions);
- ii) the proposals would not result in the loss of a site which offers a good range of facilities or makes a significant contribution to the stock of holiday accommodation;
- iii) the proposal does not conflict with countryside, landscape, coastal management, or ecology policies set out in the Local Plan.
- iv) The new use, including residential accommodation, would be accessible by active travel and public transport.

Where holiday parks and chalets are located within the South Devon National Landscape or its setting, or within 0.5KM the South Hams SAC Greater Horseshoe Bat Juvenile Sustenance Zone (JSZ), there is a requirement that they will revert to nature if tourism use ceases.

Community and Corporate Plan – Pride in Place

Explanation

- 4.70 It is noted that there has already been a significant fall in holiday park bedspaces over the last two decades, particularly in Brixham. It is anticipated that improvements in the quality and modernisation of chalets will result in the bulk of any further reduction in bedspaces, whilst improving the range of facilities offered. Policy TO6 deals with proposals to change the use, or redevelop, holiday parks to non-tourism uses.
- 4.71 Holiday parks have often been allowed in coastal and National Landscape (formerly AONB) locations particularly because they cater to the tourism economy. They have also evolved over many years, and their original planning status may be unclear. Accordingly, where development away from tourism is considered, the starting point should be that all, or the major part of such sites should revert back to open countryside or provide other landscape or ecological benefits.
- 4.72 The Local Plan also seeks to retain holiday parks in prime tourism locations or where the loss of facilities or tourism location would be harmful to Torbay's tourism offer.

- 4.73 This policy does not seek to resist the redevelopment of holiday parks that are allocated for residential use in the development plan (i.e. Kingskerswell Road, Torquay, H3T5 and H3T6).

Policy TO7: Tourism investment and monitoring contributions

Where change of use or redevelopment of tourism and leisure facilities or accommodation is approved, the council will seek contributions to mitigate the impact of loss of tourism facilities and employment, proportionate to the scale and nature of the proposal and its net impact.

Where development generates a monitoring cost to ensure compliance with tourism occupancy or other requirements, the council will seek a contribution towards monitoring.

Community and Corporate Plan – Economic Growth

Explanation

- 4.74 Policy TO7 recognises that tourism development can impact upon the need for infrastructure or create a monitoring need. Policy TO7 identified that S106 contributions will be sought to address this, where necessary to make development acceptable in planning terms. Particular regard needs to be given to mitigating the recreational impact on the South Hams Special Area of Conservation and the effect of marine tourist development on the Marine SA (see Policies NCS1 and NCS2).
- 4.75 Proposals involving the loss of tourism may result in a negative economic impact. In such instances a contribution may be sought to mitigate the loss of employment. This will be based on the net impact of proposals, and other public benefits such as improvements to the built or natural environment, or the creation of affordable housing will be taken into account in calculating the net impact of a proposal.

Part 3 - Economy, Tourism and Retail

Safe and Welcoming Town Centres for All (Town Centres and Retail Policies)



Figure 13 The Changing Role of Town Centres

Introduction

- 4.76 The role of retailing and the town centres is rapidly changing, although the changes hitting town centres have been clear for some time. The rise of the internet has profoundly affected every aspect of town centres. Linked to this the rise in home working and parcel collection has increased the demand for neighbourhood centres. There is a need for town centres to adapt and diversity towards providing a range of commercial services and good quality accommodation.
- 4.77 In the context of the Local Plan and the Town Centre Regeneration Visions, there is a policy shift of moving the Primary Shopping Areas closer to the Harbourside and Waterfront areas. There is a need to make town centres places where people want to live, and providing a high-quality built environment, realising the potential of heritage assets, and reducing crime, anti-social behaviour and the fear of crime are a key part of this strategy.

- 4.78 Many of these trends were apparent when the former Torbay Local Plan 2012-30 was being prepared, and therefore the Policies set out in this chapter represent an evolution in the previous plan's approach. A significant change is the council's transformational regeneration vision and programme, as well as the ambitious accommodation repurposing proposals. These provide a better chance of significant changes in the town centres being achieved in the Plan period.

The NPPF, Class E and Permitted Development Rights

- 4.79 Chapter 7 (paragraphs 90-95) of the NPPF (2024) reflects the changing role of town centres and promotes a much more flexible approach overall. Planning policies should continue to support the role of town centres and take a positive approach to their growth, management and adaptation. Plans should identify a hierarchy of town centres and promote their long-term viability, including allowing them to grow and diversity.
- 4.80 The NPPF defines town centres to mean city and town centres, district and local centres but excludes small parades of shops of purely neighbourhood significance. The NPPF defines Main Town Centre Uses as: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). Some, but not all, of these are in the wide-ranging commercial Use Class E. Some other main town centre uses may be in Class F1 Learning and non-residential institutions, F2 "Local Community Uses or Sui generis (within a class of their own).
- 4.81 Planning for town centres (and employment land) has undergone a major change through the introduction of a wide-ranging commercial Use Class E in August 2021. Class E covers a range of former "Class A" retail uses, as well as other leisure and entertainment uses. The government has also extended permitted development rights to convert commercial property into residential use, subject to a slimmed down "prior approval" mechanism. These changes reflect the changing nature of town centres away from being limited to retail shops, towards needing to embrace a much wider range of uses and housing. It heralds a less restrictive approach to town centre planning through the removal of many former traditional planning controls.
- 4.82 The NPPF requires Local Plans to designate "primary shopping areas" where a range of main town centre uses are supported. However, the concept of "primary shopping frontages" which should be reserved for retail shops along is no longer required by the NPPF.

The Community and Corporate Plan and Town Centre Regeneration Visions

- 4.83 The Torbay Community and Corporate Plan recognises that town centres are at the heart of Torbay's communities, and their regeneration is a key priority in the Community and Corporate Plan. This section outlines how the Local Plan supports safe, welcoming and economically vibrant centres through investment, diversification and improved public spaces. It reflects a shift towards mixed-use neighbourhoods and a more compact retail core. These changes aim to make town centres places where people want to live, work and visit.
- 4.84 The Community and Corporate Plan 2023-43 contains several priorities relevant to town centre regeneration and relevant to retail policy, including drawing investment into our town centres, partnering with the private sector to deliver major projects. These are set out in more detail in Chapter 1 of the Local Plan.
- 4.85 The regeneration visions for Torquay, Paignton and Brixham are central to delivering the Community and Corporate Plan's goals for inclusive growth and community wellbeing. These visions focus on improving housing, reducing deprivation, and enhancing the built environment. By drawing investment and creating safer, more attractive spaces, the Local Plan supports long-term transformation. It also promotes heritage, culture and public realm improvements as drivers of economic and social renewal.
- 4.86 The regeneration and improvement of town centres is central to the Local Plan. More details are available at: [**Growth and Regeneration - Torbay Council**](#) . Town Centre Place Visions. This is part of an evolving vision of regeneration sites around Torbay to ensure that the area stays relevant, resilient and attractive to future generations.
- 4.87 Key to the current Town Centres Chapter of the Local Plan is the consolidation to the retail core of the town towards the harbour area, and introducing more mixed-use neighbourhoods elsewhere in the town centre, with a substantial uptick in good quality housing. The need to reduce crime, anti-social behaviour and the fear of crime in this town centre will be an important element of making the town centres safe and welcoming for all.
- 4.88 The Local Plan is supported by a detailed Retail Study carried out by Avison Young (2022). This replaces the former Study carried out in 2013. This contains a detailed assessment of Torbay's town centres, retail trends and policy implications. It makes detailed recommendations for each of the three town centres, and the district and Local Centres, which are reflected in the Plan.

Structure of this Chapter

- 4.89 Policy TCS sets out a town centres and regeneration strategy, which seeks to support the regeneration and renewal of town centres and to focus retail and commercial activity closer to harbourside and waterfront areas.
- 4.90 Policy TC1 sets a retail hierarchy. Torquay is proposed to remain the principal town centre and largest retail, and leisure centre in the Bay, as well as being a sub-regional retail and leisure destination. Paignton's role will support its key tourism role, Brixham will primarily support local needs as well as the town's food and leisure specialisms. The Plan also identifies District Centres at Preston, St Marychurch, The Willows and a new District Centre at Devonshire Park. It is recognised that The Willows and Devonshire Park have characteristics of an out of town retail parks and should accordingly be regulated. Nevertheless, they serve a retail role for nearby housing. Policy TC1 also sets out a network of local centres with more limited range of facilities than town and district centres. Some of Torbay's former Local Centres are of only neighbourhood significance and have therefore been reclassified as Neighbourhood Centres. Policies TC2-TC7 deal with proposals for main town centre uses.
- 4.91 Policy TC8 deals with S106 contributions to support town centre regeneration. These will be sought to mitigate the impacts of development that have an impact upon the three main town centres and are similar to loss of employment contributions.
- 4.92 Policy TC9 deals with crime and anti-social behaviour issues, especially relating to the evening and night-time economy.

Strategic Policy TCS: Town centre renewal and retail strategy

The primary locations for retail and other main town centre uses in Torbay will be the town centres of Torquay, Paignton and Brixham, as defined in the Policies Map. The vitality and viability of these town centres will be enhanced through the regeneration of key sites.

Future growth of main town centre uses should follow a town centre first approach, which prioritises the three defined main Town Centres as a location for retail, leisure and other "main town centre" uses.

The Local Plan supports the following:

- i) Working with the private sector to draw in investment in town centres and support the delivery of major projects**

- ii) The delivery of regeneration visions for Torquay, Paignton and Brixham town centres;
- iii) Mixed use regeneration of key sites in town centres as identified in the Strategic Development policies and Policy H1, and regeneration visions. These will include the provision of major residential, retail, leisure, cultural, healthcare, worship, community well-being, recreational and event space, and the comprehensive redevelopment of parts of the town centres;
- iv) Significant increase in the number of dwellings in the three town centres, particularly within peripheral parts of the designated town centre and on upper floors.
- v) Maintaining and enhancing a reduced and more focussed Primary Shopping Area, shown on the Policies Map, where active ground floor retail, leisure or commercial frontages will be maintained.
- vi) Allocating a medium sized food store (1500sq m-2000 sq m) within a town centre or edge of town centre site in Torquay and Paignton town Centres.
- vii) In all three towns, shifting the retail, leisure and commercial core towards the Harbourside and Waterfront areas.
- viii) Greater flexibility for a range of commercial, and particularly residential schemes outside the primary shopping area, to achieve more balanced communities by delivering a mix of housing, employment, tourism, leisure, retail, family, healthcare, education and other commercial facilities.
- ix) The use of heritage assets, public art and public space, events, exhibitions and festivals to provide a more enjoyable, creative environment in town centres;
- x) Maintaining a network of district and local centres to provide a range of goods and services that meet the day to day needs of local communities, including the provision of healthcare facilities, skills training, employment and local food outlets.
- xi) The retention of neighbourhood centres and small “corner shops” which serve a more localised function that support local enterprise and thriving, healthy communities.
- xii) Investment in CCTV policing and other measures to reduce crime and anti-social behaviour to ensure that town centres are safe and welcoming for all.

Explanation

- 4.93 This Plan promotes a range of town centre redevelopments to provide new retail, leisure, residential and cultural facilities as part of mixed-use developments. There is an urgent need to regenerate the town centre and make them attractive living and commercial environments. Masterplans and Regeneration Visions commissioned by the council will have a key role in ‘place shaping’ within each of the three town centres.
- 4.94 The town centres, harbourside and waterfront areas are likely to be suitable for a range of commercial and residential uses to support a prosperous Torbay. Regard will had to “agent of change issues” and the avoidance of incompatible developments that could undermine existing uses.
- 4.95 The Local Plan proposes a significant uptick in town centre housing, and the Retail Study indicates a shortfall in large town centre foodstores. There is a need to improve convenience provision, especially fresh food, in all three town centres, particularly Torquay and Paignton. In Brixham, the need is more “qualitative” in terms of reducing the need to travel though Windy Corner.
- 4.96 Accordingly, the Local Plan allocates sites for in-town convenience stores in the three towns. The need, size and location of these will be kept under review as part of the town centre regeneration visions. A medium size supermarket is generally between about 1500-2000 sq. m trading floorspace.
- 4.97 The three town centres are geographically spread out and there are opportunities to focus key town centre activities into a more compact and vibrant heart. In light of the need for town centres to take on a wider role, the “primary retail areas” have been reduced in size and shifted closer to the Waterfront and Harbourside areas. A partial exception to this is the lower part of Union Street Torquay (up to Market Street) where there is a concentration of larger retail units.
- 4.98 The NPPF simplifies the number of town centre designations by removing the requirement to designate primary and secondary frontages. Based on the Retail Study, the Local Plan has retained the previous town centre boundaries but amended “primary shopping areas” to reflect the areas of town centres that should be the focus of retail and commercial activity at ground floor.
- 4.99 All town centres contain historic elements, and regard needs to be had to conservation or enhancement of heritage assets and achieving a high-quality living environment.

4.100 Torbay Community and Corporate Plan – This strategy directly supports the Community and Corporate Plan’s ambition to revitalise town centres and promote inclusive economic growth. By consolidating retail areas and encouraging mixed-use development, the Plan aims to create vibrant, resilient communities. Investment in public realm, housing and cultural assets will help make town centres more attractive and accessible. The strategy also supports safer environments and better access to essential services.

Strategic Policy TC1: Town centre hierarchy

Retail, leisure and other main town centre use development will be supported within the following centres, where it is appropriate to the role, function and scale of those centres. This will have regard to the shopping hierarchy below. The first choice for retail and related development will be town centres, followed by district centres, then local centres in sequential order and in relation to local needs and function.

The following Centres (and associated primary shopping areas for the three main Town Centres) are defined in accordance with the town centre hierarchy below and are shown on the Policies Map:

Table 10 Town Centre Hierarchy

Shopping centre hierarchy	Torquay area	Paignton area	Brixham area
1. Town Centres	1. Torquay	2. Paignton	3. Brixham
2. District Centres	1. The Willows; 2. St Marychurch	3. Preston 4. Devonshire Park & White Rock	
3. Local Centres	1. Hele Road, Hele; 2. Kerswell Gardens 3. Plainmoor; Babbacombe Barton Hill Road Walnut Road, Churston	4. Winner Street (removed from Town Centre) 5. Great Parks 6. Yannons & Yalberton (Sainsburys and Aldi (subject to improved walking, wheeling and cycling links))	

		Foxhole	

Community and Corporate Plan – Pride in Place

Explanation

- 4.101 The Torbay Retail Study (2022) contains a detailed heath assessment of Torbay’s town centres. Uses within all Torbay’s centres are monitored annually.
- 4.102 Town centres are the most significant centres within the retail hierarchy in Torbay with large trade catchment areas. They will remain the focus for retail, commercial and other typical town centre-related activities. Torquay is the key town centre in terms of size and range of facilities, levels of investment etc. Paignton and Brixham are of a smaller scale and trading influence. A significant focus of the plan is to regenerate the town centres and increase the amount of high quality residential accommodation within them. The Local Plan seeks to locate major proposals for main town centre uses in the Town Centres where possible.
- 4.103 District centres offer a good range of retail facilities and related services but to a more localised catchment area. Whilst Preston and St Marychurch are traditional district centres, with significant numbers of local traders; the Willows and Devonshire Park have characteristics of out-of- centre retail locations.
- 4.104 A fresh review of Torbay’s existing local centres has been undertaken in the light of advice in the NPPF that “small parades of shops of purely neighbourhood significance” are unlikely to constitute “town centres”. Accordingly, the number of local centres has been reduced and the number designated as neighbourhood centres increased. Local Centres are the smallest designated centre (referred to as a “town centre” in the NPPF) with a position in the retail hierarchy. As a general rule, stores of no more than about 1600 sq m (net) floor area are likely to be the maximum that is appropriate to a local centre.
- 4.105 Neighbourhood Centres are the most localised designation, and contain shops and other facilities of purely neighbourhood significance. They serve an important role in providing access to neighbourhood services and top-up items. They are outside of the retail hierarchy for major retail or other main town centre uses. As a general rule, proposals of more than 280 sq m (net) will be treated as being of more than local significance.

Policy TC2: Development in Town Centres

A new food store (convenience retail) should be provided in Torquay and Paignton Town Centres as an element of regeneration proposals.

New retail and other main town centre use development within Torquay, Paignton and Brixham Town Centres will be supported where they:

- i) Are of a scale appropriate to the nature and size of the Centre and complement its role and character; and
- ii) Sustain the shopping, leisure, tourism and commercial role of the Centre and contributes to improving its vitality and viability;
- iii) Protect or enhance cultural or tourism appeal;
- iv) Enhance the overall attractiveness of the Centre for its users through environmental improvements, better pedestrian permeability, improvements to vehicular access and parking arrangements, and other town centre management measures;
- v) Retain active ground floor frontages such as shopfronts within Primary Shopping Areas.
- vi) Contribute to reducing crime, anti-social behaviour and the fear of crime.

Community and Corporate Plan – Community and Place

Explanation

- 4.106 Policy TC 2 supports the roles of the three town centres as key parts of Torbay's town centre hierarchy. Torquay will remain the main town centre and heart of the English Riviera. Paignton's role as the leading family tourism destination, and Brixham's specialist role as food and maritime port will be supported and enhanced. Town Centre Regeneration Visions will be key to bringing forward proposals in these areas.
- 4.107 The Local Plan identifies a need to improve foodstore provision in town centres. They should be brought forward in conjunction with the Town Centre Regeneration Visions and have regard for the complex infrastructure, viability and competing uses within these areas. The following guidelines will apply to the location of convenience stores:

- **Torquay:**1500-2,000 sq. m (Lymington Road, former New Look or Fleet Walk).
- **Paignton:** 1200-1,600sq. m (Victoria Centre)
- **Brixham:** There is a qualitative need to reduce the need to travel out of Brixham. (Ideally in the town centre, although Monksbridge if suitable town centre mitigation is provided).

Policy TC3: District Centres

The following District Centres are shown on the Policies Map:

- **St Marychurch, Torquay (existing)**
- **Preston, Paignton (existing)**
- **The Willows, Torquay (existing)**
- **Devonshire Park and White Rock, Paignton (Proposed new designation and redesignation of existing local centre)**

1. St Marychurch and Preston District Centres:

New retail and other main town centre uses within St Marychurch and Preston District Centres will be supported where:

- It is of a scale appropriate to the nature and size of the Centre and complements its role and character; and**
- It provides for and sustains a range of services and facilities which contribute to the long-term vitality and viability of the Centre and the ability of people to meet their needs locally.**

2. The Willows and Long Road/Devonshire Park:

Proposals for new retail and other main town centre uses within the Willows District Centre or Devonshire Park will be supported where all of the following criteria are met:

- Major development will only be permitted where it cannot reasonably be located within the three main Town Centres; and**
- Proposal over 500 sq m should demonstrate that there is no significantly adverse impact on town centre investment or vitality and viability**

- c. Development is of a scale appropriate to the nature and size of the Centre and complement its role and character; and
- d. It provides for and sustains a range of services and facilities which contribute to the long term vitality and viability of the District Centre and the ability of people to meet their needs.
- e. Development supports measures to improve accessibility by walking, wheeling, cycling and public transport, and permeability between the Centre and adjoining residential and commercial areas.
- f. Where adverse impact on the Town Centres are identified but assessed to be less than significantly adverse, these should be mitigated or compensated in accordance with Policy TC9

Community and Corporate Plan – Community and Place

Explanation

- 4.108 District Centres are of town significance and intended to provide a range of retail and service facilities able to meet most needs. St Marychurch District Centre has a strong tourism and heritage role, being located close to several tourist facilities. Preston District Centre is located in an area where there is scope to densify the built-up area and contains several brownfield regeneration sites (See Policy SDP3). It will be important to maintain retail and other facilities serving those communities.
- 4.109 Both the Willows and the proposed new District Centre at Devonshire Park have characteristics of out-of-town retail parks. The Willows at Scotts Bridge Barton (and nearby out of centre retail stores) was developed in the early 1990s as part of the urban extension which is now Scotts Bridge/Barton. The centre (and nearby out of centre stores) serves a sub-regional role and has a significant trade draw from the town centre. It is proposed to make the recently developed Devonshire Park a District Centre. Although there is an element of reactive planning, the location serves an area of significant recent residential expansion and planned future growth. It has good links with South Devon College and other employment. However, traffic calming measures and will be put in place to prevent increased traffic pressure on Yalberton Valley and hamlets.
- 4.110 Accordingly, Policy TC3 recognises the potential impact that major development in these centres could have on the town centres and other District Centres, and therefore seeks to regulate growth in these areas to minimise adverse impacts. The threshold for determining

a “significantly adverse “impact on town centres requires a planning judgement. In assessing this, the identified retail capacity, trade draw from the town centre, and qualitative factors such as the range of facilities available in the town centres will be considered.

- 4.111 It is recognised that the Internet is now also affecting out of town centre retail. As Class E uses the stores could become a range of other class E uses. However, this is likely to require planning permission due to conditions imposed on permitted use and nature of goods sold at The Willows and Devonshire Park.

Policy TC4: Supporting Local Centres

Development of new retail and other main Town Centre uses within Local Centres will be supported where:

- i) It is of a scale appropriate to the nature and size of the Centre and complement its local role and character. There is a general expectation that major development should be located in the Town or District Centres in preference to local centres; and**
- ii) It provides for and sustains a range of services and facilities which contribute to the long-term role of the centre in assisting people to meet their needs locally.**
- iii) Unless allocated in a development plan, proposals for more than 500sq m of Main Town Centre use floorspace should be supported by a sequential and impact assessment to demonstrate their impact on Town and District Centres.**
- iv) Development should be designed to be easily accessible by active travel or public transport.**

Community and Corporate Plan – Community and Place

Explanation

- 4.112 Local centres are the lowest tier of the retail hierarchy and the smallest centres that the NPPF refers to as “Town Centres”. They are primarily intended to help serve day-to-day needs. As such the size of stores appropriate to these centres is likely to be limited. New major development (i.e. with a floorspace of 1,000 sq m or more) is likely to be more appropriately located in Town or District Centres.

- 4.113 Nationally the increase in home-working and “click and collect” locations has helped maintain the purpose of smaller centres and it is proposed to maintain Local Centres. However, more substantial growth should be directed to higher order centres where possible.
- 4.114 On that basis, and as advised by the Torbay retail study, proposals of more than 500 sq m of new Main Town Centre use floorspace should be supported by a sequential and impact test, to demonstrate that they would not have a significant adverse effect on town centre investment or vitality and viability.

Policy TC5: Managing retail outside designated centres

Proposals for retail and main town centre uses of more than 280 sq m outside of town, district or local centres must meet the following criteria:

- i) No other town centre site, edge-of- town centre, district or local centre site is suitable or available (or expected to be available within a reasonable period)**
- ii) Proposals should not cause significant adverse impacts either individually or cumulatively on the vitality and viability of existing and planned town, district, local or neighbourhood centres in the catchment area of the proposal. Proposals for main town centre uses over 500 sq m gross must provide a retail impact assessment; and**
- iii) Should not adversely impact on proposed regeneration schemes in the three Town Centres. Where an impact on town centres is identified which can be satisfactorily mitigated, proposals should provide financial or other contributions to offset harmful impacts on designated Centres.**
- iv) Development would improve the spatial distribution of accessible facilities throughout the Bay, help to achieve greater social inclusion and support healthy communities.**
- v) Be easily accessible to active travel and public transport.**

Proposals for tourism and leisure developments within Core Tourism Investment Areas will be supported subject to other policies in this Plan and will not be required to demonstrate a sequential or impacts test. In such cases it may be necessary to restrict uses to those appropriate to the tourism setting of the area.

Neighbourhood Centres are designated below;

Table 11 Neighbourhood Centres

Neighbourhood Centres (not part of the retail hierarchy)	1. Moor Lane, Watcombe; 2. Fore Street, Barton; 3. Upton Road, Upton; 4. Sherwell Valley Road, Chelston; 5. Ellacombe; 6. Roundhill Road, Livermead; Former Local Centres redesignated as neighbourhood centres: 7. Cadewell Lane, Shiphay; 8. Babbacombe; 9. Old Mill Road, Chelston; 10. Lucius Street; 11. Belgrave Road; 12. Higher Union Street, Torre 13. Wellswood 14. Lisburne Square, Torwood; -	15. Preston Down Road; 16. Collaton St Mary (proposed) Former Local Centres redesignated as neighbourhood centres 17. Marlton Road; 18. Cherrybrook Square; 19. Churston Broadway; 20. Three Beaches, Goodrington;	21. Pillar Avenue; 22. Summercourt Way

Community and Corporate Plan – Community and Place

Explanation

- 4.115 Policy TC5 deals with proposals for retail and other main town centre uses outside of designated Town Centre, District Centre or Local Centres. (Collectively called town centres by the NPPF). Policy TC5 applies a sequential and impacts test for considering out of centre (and neighbourhood centre) proposals.
- 4.116 There are some local specific circumstances that justify a local bespoke policy beyond the NPPF. Firstly, the Retail Study identifies the town centres as being vulnerable to relatively

modest out of town centre proposals, and therefore recommends a threshold of 500 sq. m. (rather than the NPPF default figure of 2,500 sq. m).

- 4.117 The NPPF indicated that “references to town centres or centres apply to city, town , district and local centres but excludes small parades of shops or purely neighbourhood significance. Torbay’s centres have been reviewed, and those of “purely neighbourhood significance” have been redesignated as Neighbourhood Centres. These do not have a role in the retail hierarchy in relation to the sequential preference for main town centre uses. However, they still serve a localised role in meeting day to day needs, and policy TC5 seeks to support development that will help them meet that need (insofar as the matter falls within planning control).
- 4.118 As a major tourism resort some “Main Town Centre Uses” such as food and drink, hotels, cultural facilities etc.) will often be appropriate within Core Tourism Investment Areas even though these (partly) fall outside main town centres. In such instances proposals will not be required to demonstrate a sequential or impact test. However, it may be necessary to restrict use to a range of uses appropriate to CTIA locations rather than the full gamut of Class E uses.

Policy TC6: Supporting access to local retail and services

The introduction of new corner shops, village shops or shops and facilities serving isolated communities will be supported in principle, where such provision enhances the sustainability of new or existing communities, and are of an appropriate scale to cater for local needs. Out of centre retail shop premises should be no more than 280 sq m.

Community and Corporate Plan – Community and People

Explanation

- 4.119 Policy TC6 provides support for small out of centre shops. Where more than 1km from other shops these fall within Use Class F2 where their premises is less than 280 sq. m. The Town and Country Planning Use Classes Order (1987) as amended in 2020 and 2021 limit the size of store by “premises” and not trading floor area. The council will take this to mean the gross internal area (also called “gross retail floorspace) which is the total built floor area occupied by a retailer or retailers, and excludes out door display, storage or sales areas).

Proposals involving the loss of retail or main town centre uses.

Policy TC7: Change of use away from main town centre uses in Town, District or Local Centres

Proposals for changes of use or redevelopment from retail or other main town centre use in Town, District, Local Centres will be supported where all of the following apply:

- i) The vitality, viability or character of the Centre as a whole is not undermined, and the Centre retains sufficient main town centre uses to maintain its role and function;
- ii) A viable concentration of commercial uses and frontages is retained.
- iii) Proposals are appropriate to the scale and nature of the Centre and will not introduce conflicts that will undermine the continued operation of other businesses in the centre.

Within Town Centre primary shopping areas, as defined in the Policies Map, proposals should retain active shop frontages and main town centre uses at ground floor level.

Outside of the primary shopping area, the council will seek to maintain active frontages where their loss would lead to a fragmentation of the overall commercial character or coherence of the centre.

Residential use will be supported in principle on upper floors of the primary shopping area. Residential use will only be supported on ground floors outside of primary shopping areas, where this does not lead to fragmentation of the centre, for example by creating inactive frontages.

Proposals for residential use in the town centres should have regard to existing and proposed nearby commercial uses and the likely impact of them on the amenity of residents.

Where commercial buildings are converted to residential use, there will be a requirement to restore building to their original historic form by the removal of unsightly features such as build-outs and signage. Where historic shopfronts need to be retained, they should be incorporated into the design of dwellings.

Explanation

- 4.120 Policy TC7 seeks to retain ground floor commercial uses in town district and local centres. The policy does not restrict residential or other uses on upper floors, subject to amenity considerations. The policy must operate within the scope of permitted development rights, but as a general rule, active commercial frontages should be maintained in town centre areas.
- 4.121 As noted, the introduction of Use Class E, changed to permitted development rights, amendments to national planning policy, and changing shopping patterns remove the traditional role of retail policies to keep town centre as the preserve of Class A1 shops. Nevertheless, town centres and particularly the primary shopping areas should remain and be enhanced as the focus of retail, leisure, commercial and cultural activity. This will also assist in their regeneration as vibrant places where people want to live. Policy TC7 seeks to provide a flexible framework that supports the retention of a range of retail and main town centre uses in the town centres, whilst also encouraging increased residential use.
- 4.122 Policy TC7 incorporates an “agent of change” principle that new development should not lead to a sterilisation of longstanding existing uses. This is particularly important in Waterfront and other areas where the night-time economy operates (see also paragraph 200 of the (2024) NPPF). Residential development should comply with other Policies in the Plan, particularly design and housing policies. Ground floor residential uses should not create 'dead frontages' in the street scene and are therefore more likely to be appropriate in the peripheral areas of town centres.
- 4.123 It is important that district, local centres retain a mix of uses that provide a useful service to local communities.

Policy TC8: Change of use away from main town centre uses outside Town, District or Local Centres

Outside the designated Town, District or Local Centres, proposals for change of use of shops and other main Town Centre uses will be supported where this would not result in the significant loss of facilities serving the day-to-day needs of local communities.

The council will seek to retain a small convenience store and other facilities serving a local area in neighbourhood centres or isolated shops unless one of the following applies:

- i) There is an alternative shop or comparable facility within 400m of the shop; or**
- ii) It can be demonstrated that there is no realistic prospect of the building operating for retail or main town centre use**

Where commercial buildings are converted to residential use, there will be a requirement to restore building to their original historic form by the removal of unsightly features such as build outs and signage. Where historic shopfronts need to be retained, they should be incorporated into the design of dwellings.

Community and Corporate Plan – Community and Place

Explanation

4.124 Policy TC8 seeks to retain local-food stores and other small scale facilities such as hair salons, pubs and cafes in neighbourhood centres and out of centre locations. However, it is recognised that these can also provide new homes. The Local Plan seeks to allow change of use or redevelopment of such areas, so long as alternative provision is available within moderate walking and wheeling distance (400 m) in the case of shops meeting local needs. It seeks to resist changes of use that would leave neighbourhood isolated or dependent upon car travel to meet “top up” needs. Policy TC8 does not refer to the Use Classes Order, but greatest attention will be given to protecting small shops selling essential items, particularly food (whether within Class E or Class F(2)).

Policy TC9: Town Centre Regeneration Contributions

Where proposals have an adverse impact on the vitality or viability of town centres which is assessed to be less than significantly adverse, or where other material considerations indicate that permission should be granted; a contribution will be sought to mitigate that impact by supporting town centre regeneration projects.

Community and Corporate Plan – Economic Growth

Explanation

- 4.125 The NPPF indicates that proposals that have a “significant adverse” impact on town centre investment, vitality and viability, choice and trade, should be refused. There is no hard and fast rule about the scale of trade-draw (i.e. the amount of retail spend diverted away from a centre by a new proposal) should be considered as “significant adverse” but the council considers that impacts of more than around 4% are likely to be “significant”.
- 4.126 However, there will be instances where the Local Planning Authority is minded to approved proposals that have an impact on town centres: either because they consider the scale or nature of impact to be less than significantly adverse, or because of other material considerations. This could include matters such the improvement of residential amenity, reduction on deprivation or the provision of affordable housing.
- 4.127 In such instances, the council will seek planning contributions to mitigate the impact. The starting point for assessing these will be the scale of impact measured over five years. This will be used to support the Town Centre Vision or other regeneration proposals.

Policy TC10: Safe and welcoming town centres for all

The Local Plan will support measures to make town centres, harbourside and waterfront safe and welcoming for all. In principle, development that helps create a vibrant, diverse daytime, evening and nighttime economy or would contribute positively to environmental improvements, lighting and safety measures within the town centres, seafront and harbour areas of the Bay will be supported.

Development proposals will be resisted where:

- i) Proposals likely to attract crime and anti-social behaviour unless it is demonstrated that they can be sufficiently controlled and a mechanism provided for so doing.**
- ii) Whilst there is an expectation that food and drink uses are a suitable use in Harbourside and waterfront Areas, the cumulative impact of licensed premises, and those providing late night entertainment and services will be resisted where this would create serious amenity, or crime or fear of crime issues.**
- iii) It would adversely impact on amenity or cause disturbance to nearby uses (including residential properties).**

Uses or developments that have an impact upon town centre monitoring, maintenance or policing will be required to make appropriate contributions towards the costs of monitoring, maintenance or policing arising from the development.

Explanation

- 4.128 The evening and nighttime offer in Torbay is currently focused on the harbourside and waterfront areas of the three towns. There is a need to diversify the offer in these areas to create a more balanced range of facilities with a more family friendly appeal. There is also a need for the town centres to diversify their current day time offer, and to extend their times of patronage, creating a more vibrant environment, with a wider range of uses, including cultural and family based activities.
- 4.129 It is intended that future developments will create town centre, waterfront and harbour areas that can be accessed by all groups in the day and night without fear of intimidation or conflict.
- 4.130 While there are opportunities and benefits to expand the evening and nighttime economies, there are also associated potential problems including alcohol-related crime and disorder, and noise nuisance. Perceived risks may discourage other groups such as older people and families from entering these areas at night.
- 4.131 The Local Plan seeks to expand the number of homes in town centres, particularly in mixed use residential neighbourhoods. While town centre residents must accept, and may well welcome, the noise and bustle of town centre living, their residential amenity must be respected, particularly very late at night. This sector needs careful management. The award of the “Purple Flag” for the effective management of the nighttime economy is a significant accolade. This requires ongoing management to ensure it is retained, for example to keep public toilets open and clean, clear up litter, provide policing and pastoral support. Where planning applications come forward which could put demands on these matters they will be required to make appropriate contributions towards CCTV, town centre monitoring and policing, and engage with strategies and initiatives to mitigate the cumulative impact of venues.
- 4.132 Torquay and Paigton Town Centres in particular contain concentrations of deprivation, which is in part driven by a poor-quality accommodation. Improved safe and regulated accommodation is needed for homeless people on Factory Row, and some of the accommodation close to the town centre. The renovation of buildings, improved streetscape and community capacity building will be supported where this would help regenerate areas of deprivation.

Policy TC11: Managing the cumulative health impacts of ‘health reducing’ uses in centres

1. Within town, district, local and neighbourhood centres, development proposals for the following uses will be permitted where consistent with the National Planning Policy Framework and would not cumulatively, including in combination with existing uses, give rise to unacceptable impacts:

- i. Hot food takeaways**
- ii. Betting shops, adult gaming centres and similar uses**
- iii. Vape shops and specialist nicotine or tobacco retailers**
- iv. Convenience retail uses where the primary offer is the sale of alcohol, tobacco or similar products**

2. For the purposes of this policy, impacts will be considered unacceptable where they would result in a material harm, either individually or cumulatively, to:

- i. The health and wellbeing of the community, including through increased exposure to uses associated with poor health outcomes;**
- ii. The vitality and viability of centres, including through a loss of diversity of uses or over-dominance of a narrow range of activities;**
- iii. The character, function or environmental quality of a frontage or area;**
- iv. The amenity or safety of users and nearby residents, including through noise, anti-social behaviour or perceptions of harm.**

3. Within reasonable walking distance of schools or schools and other places where children and young people congregate, these uses will be resisted (unless within a designated town, district or local centre) where they would increase exposure of children and young people to uses associated with poor health outcomes.

- 4.133 Town, District and Local Centres are defined, respectively, within Policy TC1. Neighbourhood Centres are defined in Policy TC5.
- 4.134 Excessive consumption of fast food has been shown to affect people’s health negatively. Obesity has been associated with high fast food outlet availability for both adults and children. Coupled with a lack of physical exercise opportunities, a high density of fast food outlets contributes to an ‘obesogenic environment’ which increases the risk of diabetes, cardiovascular issues, and other poor health outcomes.
- 4.135 Alcohol consumption has been associated as a risk factor for a wide variety of physical and mental health outcomes, including excess deaths. Alcohol can be purchased in

supermarkets and convenience stores, it has been found that living near alcohol only outlets could be a determinant of harmful alcohol consumption.

- 4.136 Gambling harms have significant impacts on physical and mental health. Gambling disorders are associated with increased all cause mortality⁶⁴ and increased mental health issues such as anxiety and depression
- 4.137 Smoking and vaping both pose health risks, with smoking being considered more harmful. The risks of vaping include cardiovascular dysfunction, periodontal and oral illnesses, and lung inflammation. Adolescent nicotine use, whether from vaping or smoking, can affect cognitive development, interfering with attention span, emotional regulation, and mental illnesses.
- 4.138 The availability of amenities becomes an important contextual factor for people's health. A lack of health promoting amenities makes it harder for people to undertake healthy behaviours such as buying healthier foods and seeking healthcare. An overconcentration of health reducing amenities is likely to impact negatively local population health.
- 4.139 Overconcentration will be determined having regard to the number, proportion and distribution of similar uses within a frontage, centre or locality, including clustering of three or more adjoining units or where such uses form a notable proportion of units. Particular weight will be given to impacts on centres serving more deprived communities or sensitive uses, where health harms may be exacerbated.
- 4.140 The Council recognises that some uses listed may fall within Use Class E and may not require planning permission. This policy will therefore apply where planning permission is required.

Chapter 5: Thriving communities - Wellbeing, safety and belonging



Figure 14 Thriving Communities

Strategic Policy SCS: Sustainable and inclusive communities strategy

Development will be assessed against its contribution to improving the sustainability of existing and new communities within the Bay, and especially the way in which it closes the gap between the most and least disadvantaged neighbourhoods in Torbay.

Development must help to create cohesive communities within a high quality built and natural environment where people want to live and work.

Proposals that regenerate or lead to the improvement of social, economic or environmental conditions in Torbay, and particularly within deprived areas, will be supported in principle.

Development proposals will be assessed according to whether they achieve the following criteria, insofar as they are relevant and proportionate to the development:

- i) Meet the needs of and enhance the quality of life of residents;
- ii) Help to close the gap between the most and least disadvantaged people and neighbourhoods in Torbay;
- iii) Help to develop a sense of place and local identity;
- iv) Promote social inclusion, and seek to eliminate exclusion based on access to housing, health, education, recreation, spiritual or other facilities;
- v) Help to reduce and prevent crime and the fear of crime whilst designing out opportunities for crime, antisocial behaviour, disorder and community conflict;
- vi) Helps to reduce social isolation by providing new and supporting existing communal facilities and opportunities for people to interact.
- vii) Support healthy, local food production and consumption;
- viii) Create a well-connected, accessible and safe community;
- ix) Contribute to the success of the local labour market by improving provision of and/or access to jobs and widening the pool of available labour.
- x) Protect and enhance the local natural and built environment, including where appropriate through planning contributions;
- xi) Deliver development of an improved type, scale, quality, mix and density in relation to its location;
- xii) Contribute towards any additional educational or training needs including the promotion and negotiation of local labour training arrangements, placements and apprenticeship schemes, and by supporting the provision of local employment space, in order to tackle worklessness;
- xiii) Enable people to have access to local services to meet their day-to-day needs including open spaces, places of worship, community halls (or rooms), play areas, leisure and recreation facilities and allotments;
- xiv) The maintenance and improvement of strategic health services in Torbay commensurate with the population size and age structure, with a key focus on Torbay Hospital.
- xv) Contribute to health services, policing and other social infrastructure where development would exacerbate shortfalls in provision; and

xvi) Provide a good standard of residential accommodation, by seeking to retain small to medium sized homes (2–4 bedrooms) and resisting change of use of buildings to HMOs and small self-contained dwellings. This applies especially in areas with significant deprivation.

Community and Corporate Plan – Community and Place

Explanation

- 5.1 The Local Plan focusses development into existing urban areas. It is important that the opportunity that development provides to help shape our urban areas in sustainable and healthy ways which benefits local communities, is achieved. We want our existing urban areas, particularly our town centres, to be places people increasingly aspire to live in.
- 5.2 Conversely, new out-of-town centre housing should not be car dependent and bereft of local amenities and services.
- 5.3 Good quality sustainable communities and neighbourhoods should have good access to employment, housing and essential infrastructure such as health and policing. Measures will be supported to safeguard and improve the provision of facilities, such as those for health, education, social interaction, worship, sport, recreation, and transport, as well as services such as crematoria and cemeteries. Contributions will be sought towards the provision by the development of new facilities where levels of demand show this to be necessary (see also Policy IN1).
- 5.4 Health, well-being and the built environment are inextricably linked. The implications of the proposals upon the health and the well-being of the affected communities must be considered at plan making and planning application stages. Health and well-being is enhanced by attractive, inspiring environments and contact with nature. Population Projections indicate that there will be an increase in single-person households over the Plan period, particularly of older people, and it will be important to provide new and support facilities to promote social connectedness. This will often involve supporting existing community, faith and other social action groups as well as the provision of buildings.
- 5.5 The NHS has identified severe shortfalls in primary and secondary health across Torbay. Accordingly, contributions will be sought towards healthcare provision from developments that are likely to increase pressure on health services.
- 5.6 Planning should create safe and accessible environments where crime and the fear of crime do not undermine quality of life or community cohesion (NPPF paragraph 58 refers).

The Police Architectural Liaison Officer (ALO) will provide advice and recommendations on designing out opportunities for crime, disorder, antisocial behaviour and community conflict in the built environment. (See also Policy TC10 Safe and welcoming town centres for all and DE1 Design.) Where the Police identify that development would create additional pressure on services a contribution will be sought towards additional infrastructure.

- 5.7 Torbay, like many seaside resorts, is characterised by pockets of severe deprivation, which often exist close to more affluent areas. Overall, the 2025 Indices of Multiple Deprivation show that Torbay remains the most deprived local authority area in the South West, with particular concentrations in “inner urban” neighbourhoods in Torquay and Paignton town centres, and some residential estates. Eleven neighbourhoods (lower super output areas comprising about 1500 people) were in the 10% most deprived neighbourhoods in England, which is one more than in the 2019 Indices of Multiple Deprivation. The clearest factors were poor employment and low income. Poor-quality housing much of which is sub-divided apartments in the private rented sector also contributes to the high levels of deprivation.
- 5.8 The Local Plan identifies “deprived areas” as those within the 20% most deprived Lower Super Output Areas LSOAs in England in the most recent Indices of Deprivation. Please note that the IMD 2025 will be used for the Plan; but this was only published in late October 2025, and the Policies map currently uses the IMD 2019 boundaries.
- 5.9 The Local Plan will support schemes that deliver a mix of employment, family housing, healthcare, childcare, education and local centre facilities,
- 5.10 The Local Plan is realistic that such areas are likely to include “lower quartile” housing and are often sustainably located close to shops and other facilities; and can therefore be good locations for affordable housing. However, the council will resist the creation of very small apartments and HMOs where this would make deprivation and associated issues more severe. Conversion of existing buildings should be carried out to a good standard that creates a decent home, rather than simply repurposing commercial accommodation for residential use at minimum cost. This would include, for example, the creation of proper house frontages rather than curtaining over shop front windows (subject to other design and historic environment considerations). The refurbishment and retrofitting of existing properties to secure a better standard of accommodation, improved energy efficiency, renewable energy provision and improved public space will be supported (see also Policies in Chapter 8 of the Plan).
- 5.11 Because Community Investment Areas are usually within established built up areas, the scope for new greenfield development within them is likely to be relatively limited. In appropriate circumstances developer contributions from other areas may be pooled to

support refurbishment, bringing vacant property into use or other environmental improvements in Community Investment Areas. The council are seeking to bring vacant dwellings back into use through its Accommodation Repurposing Programme. This has multiple benefits of regenerating areas, providing affordable housing and building local skills.

- 5.12 The council will use Local Development Orders, Article 4 Directions and Compulsory Purchase powers to help deliver comprehensive urban renewal schemes and the ambitions of this policy.

Strategic Policy SC1: Public health and wellbeing

Development must contribute to improving the health and wellbeing of the community by reducing health inequalities and helping to deliver the conditions to enable healthy lifestyles and sustainable neighbourhoods. Development which exacerbates factors which worsen living conditions, and therefore harm public health objectives, will not be supported.

Development must have regard to the health needs of the population and have special consideration towards measures which will address reducing health inequalities, including those geographically across the Torbay area and those which are experienced between different population groups.

To achieve these requirements, development must, through its location, design and suitability to local context, maximise its potential to address the place-based determinants of ill-health in the local area, including with strong reference where relevant to:

- **Active travel - enabling active mobility through walking, wheeling and cycling**
- **Housing – delivering diverse house types; affordable housing and accommodation to address local needs; energy efficient homes with good daylight, ventilation and thermal comfort; and comfortable living environments**
- **Communal, spiritual, cultural and community facilities - to promote social connectedness and interaction**
- **Employment – taking opportunity to provide local employment through construction and operation**

- **Natural environment – reducing exposure to environmental hazards, facilitating access to nature, and participation in physical activity in outdoor settings**
- **Transport – enabling ‘access for all’ and the use of public transport**
- **Healthier food – providing opportunities to produce and increase access to healthier food and decrease exposure to unhealthy food environments**

Development proposals should be prepared with special consideration for the identified needs and issues of the local community and neighbourhood where it is located. This means early engagement with the public and local stakeholders, as well as referring to available local evidence which can augment this understanding.

Development which creates an improvement of access and provision to health and care services will be supported.

Development proposals identified through screening as having the potential to give rise to material, complex or cumulative impacts on health and wellbeing, including effects on its determinants, health inequalities and/or different populations groups (including those with protected characteristics) will be required to undertake a systematic assessment of those impacts, such as a Health Impact Assessment, proportionate to the scale and nature of the proposal

Community and Corporate Plan – Community and Place

Explanation

- 5.13 A ‘healthy place’ is a good place to grow up, live, work and grow old in. It is a living environment which supports people to live their lives in a state of good physical, mental and social well-being. Healthy places contribute to the prevention of ill health and provide the environmental conditions to support good health.
- 5.14 Health, well-being and the built environment are inextricably linked. New development has the potential to positively or negatively affect the wider determinants (‘the causes of the causes’) of health in our neighbourhoods. It is therefore important that the implications of proposed development upon the health and well-being of communities are considered.
- 5.15 Health indicators for Torbay relating to poor health and premature mortality show a relationship strongly related to demographics and levels of deprivation, including significant levels of health inequality (variation in health and wellbeing across different population groups). In our most affluent areas residents can expect to live almost eight

years longer than those in our most deprived communities. There are significant gaps in healthy life expectancy (years in good health) between the most affluent and deprived areas. Torbay's annual Joint Strategic Needs Assessment provides further detail about the specific health needs of the population across Torbay and should be referred to as part of the development of planning applications, particularly when considering Health Impact Assessment.

- 5.16 Development can contribute to creating healthier communities in a number of ways. For example, by providing decent living environments, reducing the effect of fuel poverty, providing open space and recreation areas, promoting social connectedness, access to healthy food and supporting active travel. Torbay has a significant ageing population, many of whom live alone, and the implementation of Age-Friendly initiatives to promote inclusive, healthy environments and reduce isolation is important. Also, child-friendly design is crucial in helping to enable good health across the life-course.
- 5.17 All developments should consider how they can promote healthier outcomes. Proposals will be expected to assess their impact on health, proportionate to the scale of development. Health Impact Assessment is a mechanism that can be useful to consider and integrate health within the design of new development. It can be implemented at various scales (for instance comprehensive, rapid or desktop) tailored to the complexity and scale of proposals. Torbay Council provides local planning guidance on methods to help developers assess and evidence how health and wellbeing has been considered and integrated into proposals and will use this information to aid decision making. The use of design guidance such as Building for a Healthy Life and the principles of Active Design (Sport England) will be used to support the development of site proposals and masterplans.
- 5.18 Approaches to delivering healthy places across Torbay need to take account of their context and the community within which it is placed. Our communities are different. There are 16 Community Partnership areas across Torbay, with their own specific needs. Engagement with communities and local stakeholders is essential when considering how new development can contribute to creating healthier places. The local needs of different population groups within local areas must be considered and referred to as part of the evolution of proposals. Development proposals which make genuine efforts to support these needs will be looked upon more favourably.

Strategic Policy SC2: Sport, leisure and recreation for healthy living

Physical activity and access to open spaces is important for health and well-being. Development should provide access to sport, leisure and recreation facilities according to the additional demand it generates and the capacity, condition and location of existing facilities. Where a need is identified for new facilities, they should be appropriately inclusive and provided in appropriate locations, preferably co-located with existing and other planned sports facilities, where they are accessible for all users (i.e. following the transport hierarchy) including a range and choice of transport and comply with other policies in this Plan, particularly in relation to residential amenity.

An assessment of existing provision of such facilities will be required with development proposals proportionate to their scale, allowing the council to determine whether a contribution is needed towards new facilities or the enhancement of existing provision at least in line with the Fields In Trust open spaces standards¹

Major new leisure facilities should be developed on accessible and well-located sites, wherever possible, using available town centre sites as first preference, then edge of town centre sites, district centre locations and existing concentrations of facilities. Any proposal that may lead to likely significant effects on sites protected under European legislation will only be permitted where no adverse effect on the integrity of the site can be shown.

The key sports and recreation facilities and improvements to these facilities will be supported:

- i) Torquay United Football Grounds and environs.
- ii) Riviera International Conference Centre and environs.
- iii) Sports facilities at Torbay Leisure Centre and associated VeloPark and pitches at Clennon Valley, Paignton;
- iv) Water sports facilities at Torquay, Paignton and Brixham *
- v) Sports facilities at Churston, Brixham (area of search).*
- vi) Other Sports pitches identified in the Torbay Playing Pitch Strategy (2024), Local Football Facilities Plan (2024) and other evidence base that emerges.*

There will be a presumption against loss of existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, that should not be built on unless:

- i) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

- ii) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- iii) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss.

Planning Contributions will be sought for the long-term maintenance and management of new recreation provision and mitigation where appropriate.

*Sites not shown on the Policies Map

Community and Corporate Plan – Community and People

Explanation

- 5.19 Torbay has a fantastic environment for sport and recreation, and there are clear links to health, well-being and productivity. Assessments of existing and future sports and recreational need have been undertaken by the council. This evidence base will be updated periodically as required and this Policy should be applied to development
- 5.20 The Local Plan has an important role in protecting and enhancing existing provision, supporting the development of new facilities and helping to bring forward the ambitions of people, clubs and representative organisations.
- 5.21 The provision of sports facilities often involves significant investment, and proposed new sites must be capable of sustaining and servicing any development through, for example, adequate car parking, and accommodating appropriate intensification of use, such as floodlighting. Proposals should be in accordance with other Policies in this Plan, for example those relating to countryside and design. Provision of sports, recreation and leisure facilities in more rural areas will need to be sensitively and carefully designed to ensure the facility, and its use, complements and does not unduly harm the character and appearance of the area.
- 5.22 The availability, within an acceptable safe walking and wheeling distance, of sport, leisure and recreation facilities is an essential ingredient of a sustainable, healthy community.
- 5.23 Where proposals result in the loss of open space or recreation facilities, the above Policy and the NPPF require an assessment of their value to be carried out and replacement facilities of equivalent or better quality, quantity or location, to be provided.
- 5.24 In reference to impacts on sites protected under European legislation it should be noted that in Torbay this may be particularly relevant to the impact of floodlighting, including in relation to bat pathways through and near to sports facilities.

Strategic Policy SC3: Education infrastructure and inclusive learning strategy

The Local Plan will support the improvement of existing and provision of new educational facilities to meet identified needs in Torbay. This includes both the expansion of schools to meet identified needs in terms of providing sufficient places and improving the quality of provision; and the construction of new schools to address longer term requirements associated with the delivery of new homes. The ongoing needs of South Devon College will be supported.

Planning Contributions will be sought from development that generates a need for school places or facilities.

The following education facilities are proposed in the Local Plan, subject to master planning and confirmation of need from Children's Services:

- i) Improved provision of early years facilities within existing schools
- ii) Improved primary school facilities serving the north and west of Torquay including provision for new facilities serving Torquay Gateway.
- iii) The provision of an improved Special Education Needs and Disability (SEND) school to consolidate and expand existing provision.
- iv) A new school at Inglewood, Paignton.
- v) Identification of a site for a ninth secondary school in the Bay, or expansion of existing schools to meet demand for secondary places.

Community and Corporate Plan – Community and People

Explanation

- 5.25 The NPPF requires local planning authorities to give great weight to the need to create, expand or alter schools, and to work to resolve key planning issues. The Local Plan supports the delivery of the council's capital programme to address current pupil number increases across Torbay. Policy IN1 seeks developer contributions towards infrastructure, including education facilities, where this is needed for development to proceed. Policy E6 deals with Local Training Agreements.

- 5.26 The Community and Corporate Plan prioritises the provision of safe environments for young people to thrive in and providing opportunities for everyone to raise their skill level. The Plan seeks to establish pathways for all young people, including those with special educational needs and/or disabilities (SEND) and care experienced young people.
- 5.27 The need for school places will be kept under review by the council's Education Team. The council's 2025 School Place Planning Statement indicates the impact of low birth rates in Torbay (mirroring the national trend) leading to spare capacity of primary places: 28.3% in Torquay, 25.5% in Paignton and 37.7% in Brixham. Closing schools is always a difficult decision and results in the loss of a wider community facility and a local source of good quality employment. It is not currently proposed to close any schools unless better alternative provision is made. This will need to be kept under review. However, there is likely to be a need for school improvements and potentially relocation where existing premises lack modern facilities.
- 5.28 In terms of secondary schools, there is a high inwards migration at secondary school level (Year 7) due to the pull of Torbay's three selective schools. This creates a capacity pressure on the secondary sector, although it is currently intended to meet this capacity within existing school campuses.
- 5.29 There is a significant, and growing, demand for Special Educational Needs (SEND) provision and provision is split across several sites. In the short term it is proposed to expand and utilise existing buildings. However, the Local Plan, in partnership with Children's Services and the School Place Planning Team will consider allocating a single site to consolidate and expand SEND provision.
- 5.30 The Plan is committed to provision of full coverage of education facilities located close to local communities. Where the expansion of a school results in the loss of public open space, Department for Education funding will be sought to identify and improve alternative open space and facilities in line with Policies SC1 and SC2.

Policy SC4: Sustainable food production and land protection

The protection of existing and provision of new local food growing spaces, at a variety of scales, will be supported and expected from new development wherever practicable.

The change of use or redevelopment of allotment sites will not be permitted unless appropriate improved or equivalent alternative publicly available provision is made, or it can be clearly evidenced that there is no demand for the facility.

Development which would result in the detriment to or loss of the best and most versatile agricultural land (Grades 1, 2, or 3a) will only be permitted where there is an overriding need for the development and it is demonstrated by the applicant that it cannot be accommodated on lower grade land. Where development is proposed and there is a choice between sites of different grades, development should take place on land of the lowest grade feasible, subject to other Policies in the Plan. Where development is approved on the best and most versatile agricultural land, the local authority will require a schedule for the reuse of soils to be provided in accordance with an agreed agricultural land assessment.

Residential schemes at all scales should include provision for sustainable food production, proportionate to the scale of development. This should be guided by the provision indicated in Table 6 below. Food growing opportunities will also be sought from non-residential development on a case-by-case basis.

Food production features may include edible landscaping (hedgerows, trees, vertical growing), public amenity space (communal gardens, orchards, allotments, roof gardens, atriums/courtyards) and/or private amenity space (balconies, gardens). On larger development sites the specific provision of allotments or neighbourhood growing spaces will be sought. Where provision cannot be achieved on-site, off-site contributions to schemes within the nearby area will be sought.

Community and Corporate Plan – Community and Place

Explanation

- 5.31 Growing local food encourages people to lead more active, healthy lifestyles and generates community cohesion. Sustainable food production is a component in creating a low-carbon society and it helps the Bay become more resilient to future food insecurity. Local food has fewer food miles, and therefore less associated carbon emissions, and also helps support the local economy. Torbay stakeholders have identified allotment shortages, lack of community growing areas and a lack of producer outlets in towns as key issues to be resolved.
- 5.32 The accommodation of new development will inevitably put pressure on productive agricultural land, especially in an area as constrained (in terms of land area) as Torbay. The location of proposed development sites in this Plan has been informed by Sustainability Appraisal and Habitats Regulations Assessment. Consequently, the loss of best and most versatile agricultural land has been minimised. However, there are also

many opportunities for development to help contribute at smaller and larger scales towards providing important local food growing and foraging opportunities.

- 5.33 Development and changes of use which result in the loss of high-grade agricultural land will need to establish that alternative, previously developed sites within existing developed areas have been investigated. Where there is an overriding need to develop on agricultural land of Grades 1, 2 or 3a and there is a choice between sites of different grades, land of the lowest grade should be developed, unless the lower grade land has an environmental value in terms of its landscape, nature conservation and historic or archaeological status which outweighs its agricultural significance.
- 5.34 The on-site provision of new allotments will be sought from major residential (30+ dwellings) and mixed-use schemes. However, it is recognised that the opportunity for some schemes to realistically deliver formal allotments may be limited. For instance, site-specific constraints and circumstances will have an impact. Opportunities to deliver allotments may be better realised through larger, strategic sites which offer a scale of development with greater prospects to secure their delivery. The enhancement of orchards will be supported, particularly where this would strengthen the growing of local varieties of fruits. Off-site contributions to support schemes, particularly the provision of neighbourhood growing, in the local area will be considered where sufficient on-site provision is not achievable.

Table 12 Sustainable Food Production Provision in Housing Developments.

Development scale	Edible Landscaping e.g. hedgerows, trees, vertical growing (provided in public and private spaces) provided specifically or integrated with ornamental planting	Private gardens and/or balconies e.g. ground/roof gardens with appropriate soil conditions, balcony provision of growing space	Outdoor public amenity growing space e.g. communal and community gardens, atriums/courtyards, orchards, neighbourhood growing schemes (at a variety of scales)	Allotments e.g. public provision of dedicated allotment spaces for the managed use by individuals and groups

1-9 dwellings	✓	✓		
10-29 dwellings	✓	✓	✓	
30+ dwellings	✓	✓	✓	✓

Policy SC5: Community facilities, infrastructure provision and developer contributions.

All development should contribute positively to the provision of the necessary community facility demand that will arise. Major proposals should provide the necessary supporting infrastructure and community facilities proportionate and appropriate to the scale of the development. These will include health, leisure, sport, education, meeting spaces, and cultural infrastructure, cemetery provision and other facilities such as allotments or community food growing.

Local services and facilities should be accessible via their location and have good transport connectivity. The loss of existing community facilities and buildings will be only be supported where it is demonstrated that they are not needed, or improved alternative provision is made.

Community and Corporate Plan – Community and People

Explanation

- 5.35 The NPPF requires local plans to plan positively for the provision of community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) to enhance the sustainability of communities and residential environments. Plans should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.
- 5.36 This policy seeks to support sustainable communities where residents enjoy a high quality of life by protecting, retaining and enhancing existing community facilities, including

resisting the loss of needed community facilities, and ensuring that new community facilities are located in accessible locations within existing settlements. Development should only be approved where there is sufficient capacity within existing infrastructure, or where there is a programme for improvements and planning contributions can mitigate the impact of development.

Policy SC6: Cemetery and memorial provision strategy

A new cemetery is proposed for Green Burial in the Broadsands, Churston, Galmpton Neighbourhood Plan Area. The specific site will be determined on the basis of the following criteria. Proposals for other cemetery provision, crematoria or gardens of memorial will also be supported where they meet the following criteria:

- i) Do not have an unacceptable impact on landscape sensitivity, biodiversity, heritage, archaeology or residential amenity.**
- ii) Provide a level of tranquillity and dignity. Where proposals include crematoria or the scattering of ashes, they should be located away from residential properties and safeguard residential amenity.**
- iii) Proposals should make reasonable provision for people's spiritual and mourning needs. Where proposals include chapels, or other ceremonial facilities, they should not cause severe harm to the road network and should be reasonably accessible to active travel and public transport. They should be sited to minimise their landscape and ecological impact.**
- iv) Are located outside Groundwater Protection Zones or areas at risk of flooding.**
- v) Are outside areas of contaminated land or former landfill areas.**
- vi) Proposals that provide or improve public access open space or recreation will be supported. Support will be given to proposals that enhance and improve public access, and management to maximise their wildlife and biodiversity value.**

Community and Corporate Plan – Community and People

Explanation

- 5.37 Torbay's cemeteries are nearing capacity for burials, although sufficient crematorium capacity exists. Current projections indicate a need to identify about a hectare of land for burials. To avoid a disruption in burial services, new provision or a new cemetery site will be required during the Plan period. The Local Plan proposes additional burial facilities in the south of Torbay and provides an area of search in the SDBCG area. This could be in association with improved green infrastructure/ recreation facilities needed to reduce pressure on the South Hams SAC. Provision could also be made as part of Torquay Gateway proposals in conjunction with the existing site at Conqueror Wood (See Policy SDT2).
- 5.38 The location of cemeteries is subject to detailed Environment Agency Regulations (the Environmental Permitting Regulations, particularly in relation to watercourses and avoiding contamination), and therefore an "are of search" is included at this stage of the Plan.
- 5.39 Appropriate locations for new cemeteries will need to consider potential impacts on waterbodies. Cemeteries must not pollute groundwater or surface water and the Environment Agency will normally object to the locating of any new cemetery or the extension of any existing cemetery which could have a detrimental effect on groundwater, well, borehole or spring used to supply water that is for human consumption.

Chapter 6: Moving Torbay - Sustainable travel and inclusive access



Figure 15 – Moving Torbay

Strategic Policy TAS: Transport Vision and Hierarchy

To provide integrated, accessible, and inclusive transport for everyone, in line with the transport hierarchy, that facilitates growth and supports reaching net zero carbon.

Development proposals will be supported where they apply a vision-led approach to transport and place-making, contributing to the achievement of the Transport Vision, providing high quality, safe, healthy and accessible places.

All development will have regard to the transport hierarchy, demonstrate that patterns of movement, streets, parking, servicing and public realm are integral to the design of well-connected, attractive and sustainable places. Development must prioritise safe, direct and attractive access by walking, wheeling, cycling and public transport to homes, jobs, education, healthcare, town centres and other everyday

services, while also supporting opportunities for digital connectivity and reduced need to travel where appropriate.

Explanation

- 6.1 Transport has a significant impact on our local environment, and it is therefore important to keep people and businesses connected whilst also improving air quality, enhancing our natural environment and reducing emissions. By improving transport connectivity and sustainability it will help deliver the transport infrastructure that is needed for our people and our place, underpinned by the need for resilience and safety on the network.
- 6.2 The transport hierarchy ensures that as much emphasis as possible is given to the most sustainable modes of transport and that there is a choice of transport options for all.

Policy TA1: Assessing and mitigating the impact on the transport network

To assess and mitigate the impact of development and to promote sustainable travel choices, the following information will be required:

- *A Transport Assessment and Travel Plan: where the proposed development is likely to have significant transport and related environmental impact (in accordance with Department for Transport guidance); or*
- *A Transport Statement: where the development has relatively minor transport implications (in accordance with Department for Transport guidance).*

A walking and cycling route audit shall be included within the Transport Assessment or Statement. This should relate to immediate site and surrounding areas, including travel origins and destinations for all users and desire lines.

All new development that affects transport, especially if it leads to more journeys and/or increases demand for sustainable travel, will be expected to contribute towards mitigating its impact and delivering a safe, effective and inclusive transport system. This could include direct improvements and/or financial contributions towards enhanced transport infrastructure or service provision.

In some cases, the parking requirements defined through policy TA4 account for an expectation of increased demand for sustainable travel and improvements and/or contributions will be necessary.

Essential infrastructure to support delivery outcomes set out in a Transport Assessment, Statement and/or Travel Plan must be provided as part of the development as an additionality to the wider sustainable travel contributions expected of all development.

Community and Corporate Plan – Community and People

Explanation

- 6.3 Appropriate and proportion assessment of the impact of development on the transport network is necessary to ensure it is not adversely impacting or stifling economic growth.
- 6.4 Travel Plans should be site-specific, evidence-based and proportionate. They should set clear, measurable modal share targets (for all users), annual monitoring and reporting commitments, review triggers and financial bonds where appropriate to support mitigation measures if targets are not met. Where there is an existing Travel Plan but only minor transport implications are expected, an update to the Travel Plan may still be necessary.
- 6.5 It is important that all development takes accountability and responsibility for the impacts it has on the transport network, and makes an appropriate contribution to delivering appropriate mitigations for these to achieve the Transport Vision.

Policy TA2: Delivery of a safe, effective and inclusive transport system

A safe, effective and inclusive transport system will be achieved through:

- Delivery of the Transport Vision and Hierarchy across all development providing more travel choice for all;
- Focusing development in locations that are accessible and can be safely connected, through direct and efficient routes, for walking, wheeling, cycling and public transport, as well as by private vehicles to essential, everyday facilities;

- Providing opportunities for digital communication and remote working to reduce the need to travel;
- Prioritising road safety
- Maximising the opportunities for sustainable transport of freight;
- Appropriate provision of facilities for disabled persons, such as suitable levels, signage, and facilities; and
- Supporting the delivery of the objectives of the Local Transport Plan, including considering impacts outside of Torbay.

Strategic Improvements

The Council will support strategic transport improvements that strengthen connections within Torbay, to the wider sub-region, and to national and international markets, where they enable efficient, reliable and inclusive movement in line with the transport hierarchy, including those set out in the Local Transport Plan and other supporting modal plans.

Where relevant, proposals should support seamless interchange between all modes and improve journey reliability, affordability, accessibility, legibility and resilience.

Land will be safeguarded and developer contributions sought where justified to enable delivery.

Development and infrastructure proposals should support healthier communities, climate resilience and net environmental gain, informed by collaboration with transport providers, infrastructure operators and neighbouring authorities where cross-boundary impacts arise.

Community and Corporate Plan – Community and People

Explanation

- 6.6 An effective and efficient transport network is vital for people's lives and livelihoods, supporting Torbay to be healthy, happy and prosperous, improving the quality of life for residents and create a fairer and healthier society.

6.7 This includes:

- A safe and reliable transport network for all
- Strengthening walking routes around key areas and to/from key facilities providing opportunities for physical activity, social interaction and access.
- Delivery of high quality cycle infrastructure to develop safe cycling routes for all, not just on key trails but also the links to those
- Supporting a step change in public transport service and infrastructure provision, especially on core routes,
- Better integration to increase travel choice and opportunity,
- A cohesive network of electric charging
- Continued investment in the existing highway network to ensure resilience and address capacity constraints where possible

6.8 Development will be expected to deliver and contribute to local strategic enhancements. Particularly where related to town centres and harbour areas, these shall also consider measures to enhance accessibility and use of taxi and ferry services.

6.9 To deliver the Local Plan's aspirations and objectives, including regeneration of the town centres and address deprivation, improvements are needed to ensure the strategic transport network across all modes is fit for purpose and accessible, around the Bay and to the wider sub region and beyond. This is vital to delivering economic prosperity and also to support new development, ensuring the success of the Strategic Delivery policies.

6.10 The visual impact of transport infrastructure (including signage) within the street scene should be kept to a minimum, to avoid proliferation of unnecessary clutter or harm to amenity and the historic features.

Walking, Wheeling and Cycling Network

6.11 Torbay's Local Cycling and Walking Infrastructure Plan (LCWIP) identifies Bay Trails and supporting/connective walking, wheeling and cycling infrastructure across Torbay, as well as enhancement and protection of the South West Coast Path and King Charles III

England Coast Path. There are also LCWIPs covering neighbouring areas which combine to enhance cross boundary travel.

Local Public Transport Services

- 6.12 Improvements to the bus and public transport networks and supporting infrastructure to provide a step change in quality, accessibility and integration with other forms of transport, within, to and from Torbay as appropriate.

Mobility Hubs

- 6.13 Development of multi-modal mobility hubs in key locations will improve connectivity to the transport network and increase travel choices. Individual hubs may provide different facilities appropriate to the location, but all major development must consider opportunities.. Sites suitable for more significant and/or bespoke facilities include (but are not limited to):

- Paignton Transport Gateway, bringing together investment in the railway station, bus station, car parking and public realm
- the former Park and Ride site at Churston, Brixham,
- the site adjacent to Gallows Gate. Torquay.

- 6.14 Proposals that contribute to the delivery of these sites will be supported where in accordance with other policies in the Local Plan.

Electric Vehicle Infrastructure

- 6.15 Electric vehicle infrastructure will not be considered in isolation and will feature across strategic and non-strategic investments in the transport network.

Rail Network

- 6.16 A new railway station, Edginswell Station, within the Torquay Gateway, will support residential growth, employment sites, and critical health facilities, whilst upgrades to existing stations will provide enhanced accessibility and other facilities to ensure everyone can access rail services.

- 6.17 Development of proposals to extend the railway line to, and with a new station at, Goodrington Sands and continued maintenance and enhancement of the rail network serving the Bay, supporting the future needs.
- 6.18 Minimising the impact of development upon level crossings, and where necessary seeking developer contributions to help fund improvements to, or consider alterations to the operation and safety of, level crossings, where these are required as a result of development.

Highway Network

- 6.19 Multi-modal enhancement of the Major Road Network, including the critical junctions and improving the flow of traffic, to ensure reliable connectivity within, to and from Torbay, with improvements to air quality along the corridors. A comprehensive solution to transport issues is needed to enable the development in Collaton St Mary (SDP4), and development contributions are expected to help fund these strategic improvements.
- 6.20 On-line multi-modal improvements, resilience, and traffic management schemes where necessary to protect and enhance critical route infrastructure.

Policy TA3: Development layout, access and connectivity standards

Delivering suitable layouts

All layouts will support sustainable travel as the first choice, prioritising a people-first approach. Layouts should respond to the site context, be inclusive and accessible and reflect the principles of healthy streets and Manual for Streets.

Direct and efficient multi-modal travel links to, from and through new development will be provided for, or secured in perpetuity, delivering unfettered connectivity and providing connections to facilities, services, open space and potential future development beyond the site boundary. To support this, ransom strips will be resisted.

This will include provision or connection to a network of footpaths, cycle routes, green infrastructure and public transport which shall include provision of, or future provision for, public rights of way and permissive paths – particularly **within** masterplan and growth areas where there is a wider benefit.

All development shall provide safe turning/manoeuvring and stopping areas for vehicles within the site, including deliveries. Measures for emergency service vehicles, waste collection vehicles and public transport vehicles to access and service the site will be included, as necessary and appropriate, in a way that would not disrupt the service they provide.

All new highway infrastructure (including walking, wheeling and cycle connections where there is a wider benefit) will be constructed, completed and maintained to the council's approved highway standards, meet highway safety standards and be available for use by the occupants, and other users of the development – including those linking through from neighbouring areas. The Local Highway Authority will seek to adopt highway infrastructure via Section 38 of the Highways Act 1980 as a default position. Where this is not achievable a Private Management and Maintenance Plan confirming funding, management and maintenance regimes for the lifetime of the development will be required.

Accessing the highway network

Any new access (vehicular, pedestrian or cycle) to/from the highway network will:

- **Provide appropriate and suitable access for all modes, prioritised in accordance with the Transport Hierarchy, to a safe standard, that minimises conflicts between modes and users;**
- **Maintain an acceptable network capacity or provide suitable mitigation; and**
- **Not have an unacceptable impact on road safety**

Community and Corporate Plan – Community and Place

Explanation

- 6.21 It is an important principle that new development should integrate with the surrounding area in terms of its connectivity for all modes providing safe, free flowing and well maintained access throughout the development and the surrounding area..

Policy TA4: Parking and shared transport provision

Parking for all development should be provided in accordance with the council's adopted parking standards, unless a robust, site-specific justification demonstrates that an alternative level of provision is appropriate having regard to accessibility, development type and mix, local car ownership, highway safety, parking stress, seasonal demand and the availability of sustainable transport options.

Appropriate levels and standards of parking will be incorporated for all users, including cycles, adapted cycles, scooters, powered two-wheelers, mobility scooters, blue badge holders, visitors, deliveries, servicing vehicles, shared transport and electric vehicle charging. Parking must be safe, secure, accessible, convenient, well-managed and integrated into the design of development so that it supports placemaking, does not dominate the built environment and protects pedestrian and cycle priority.

The loss of existing parking or servicing provision for any mode will be a material consideration in planning applications. Where existing provision is displaced, applicants must demonstrate that replacement provision, demand management or mitigation is sufficient to avoid unacceptable effects on highway safety, accessibility, local amenity, parking stress, town centre vitality and community safety.

Shared transport, car clubs, bike share and similar mobility services will be supported where they demonstrably reduce private car use and parking demand. They should not normally be treated as a direct substitute for required parking unless this is justified through a Transport Assessment or Transport Statement, secured through a Travel Plan or management plan, and supported by long-term delivery, monitoring and funding arrangements.

Where parking provision is proposed below the relevant standard, applicants must provide proportionate evidence that the reduced level will not cause unacceptable overspill parking, highway safety issues, community conflict or harm to amenity. Mitigation must be secured where necessary, including additional active travel measures, public transport support, shared transport, parking management, permit-free arrangements, delivery and servicing controls, or contributions towards sustainable transport infrastructure. Such measures must be additional to the wider

sustainable travel requirements expected of all development and must be maintained for the lifetime of the development.

In applying site-specific parking requirements, the council will seek to minimise community conflict, anti-social parking and obstruction of streets, footways, cycle routes and access for emergency, refuse and servicing vehicles. Significant weight will be given to highway safety, inclusive access, community safety and the need to maintain attractive, accessible and well-functioning places.

Where development is proposed in Controlled Parking Zones, residents' parking schemes, areas of high parking stress, town centres or other locations where overspill parking could be harmful, the council may require permit-free or low-car development, parking surveys, parking management plans, legal agreements, Traffic Regulation Orders or other enforceable measures to ensure that the development operates as intended.

Table 13: In Principle Minimum Parking Standards:

Cycle Parking	Dedicated cycle parking is required within all new development and must be considered from the outset of the design process. It should be secure, covered where appropriate, well-lit, naturally overlooked, convenient to use, accessible by step-free routes wherever practicable, and located closer to main entrances than general car parking except for blue badge parking. Cycle parking must be designed for the exclusive use of cycles and maintained in perpetuity. Storage in habitable rooms, bin stores, circulation areas or balconies will not be acceptable. A proportion of spaces should be suitable for adapted cycles, cargo cycles, trailers and other non-standard cycles, with charging provision for e-bikes and e-cargo bikes where appropriate. Where cycle parking is provided within a standalone store or internal area, access should be level or step-free where practicable, users should not have to negotiate more than one door with their cycle, and doors should be wide enough to accommodate non-standard cycles. Where rear storage is proposed, an accessway should be designed in from the beginning to avoid the need for cycles to pass through habitable rooms. Provision for safe and secure electrical charging should be made within or immediately adjacent to cycle parking where e-bike or e-

	cargo bike use is likely, subject to appropriate fire safety, management and maintenance arrangements. Residential use: 1 space per bedroom Houses in multiple occupation: 1 space per letting bedroom
Provision for scooters (foot propelled) and powered two-wheeled vehicles including motorcycles.	Secure, safe and conveniently located provision should be made for foot-propelled scooters and powered two-wheelers, including motorcycles and mopeds, where demand is likely. Powered two-wheeler parking should be clearly signed, naturally overlooked, well-lit, accessible without conflict with pedestrians and cyclists, and include anchor points or equivalent security features where appropriate. Major developments should provide powered two-wheeler parking based on at least 5% of the car parking provision. Minor developments will be considered on a case-by-case basis, having regard to the nature of the use, accessibility, expected demand and opportunities to avoid informal or obstructive parking.
Provision for mobility scooters:	New development that is likely to cater for those making use of a mobility scooter, such as age restricted housing and extra care units, will be expected to make provision for storage areas and dedicated charging points on the ground floor and must form an integral element of the design of the development.
Electric Vehicle Charging provision:	New houses with at least one designated parking space within the curtilage of the plot must provide at least one active electric vehicle charging point. For flatted, communal and non-residential parking, active and passive electric vehicle charging infrastructure should be provided at a level appropriate to the scale, use, parking layout, likely dwell time and future demand, with details agreed with the Local Planning Authority. As a starting point, residential development with off-street parking should provide 50% active charging provision and commercial development should provide active charging for 25% of spaces, with passive provision for the remaining spaces unless otherwise justified. For residential extensions creating additional bedrooms, where off-street parking exists, provision must include at least passive provision, with cable runs, for an EV charging point.

Disabled parking requirements:	Residential development should provide at least one accessible parking space for each wheelchair accessible dwelling, together with appropriate provision for disabled visitors and future adaptation where spaces are not initially laid out as accessible bays. Non-residential development should provide blue badge parking at a level appropriate to the use, total parking provision and expected demand, located close to the most suitable accessible entrance with safe, level access.
Parking for People with Young Children and specialist parking	Provision for child and parent or specialist parking for development where appropriate.
Shared Transport /Car Club	Residential developments of 100 or more homes should provide space and safe access for shared cycle provision at a ratio of at least 1 shared cycle space per 20 homes and shared car provision at a ratio of at least 1 car club space per 100 homes, unless a Transport Assessment or Transport Statement demonstrates that an alternative level is more appropriate. For residential, leisure, visitor accommodation and employment uses, contributions towards shared transport, car clubs, bike share, public transport or other mobility measures may be required where these are necessary to support reduced parking provision, manage demand or improve sustainable travel choices.
Car parking provision:	All development should provide an appropriate level of car parking for occupants, staff, visitors and operational needs, while avoiding excessive provision that would undermine sustainable travel or dominate the design of the site. Where no specific standard is defined, parking should be justified through a reasoned and site-specific assessment of likely demand, accessibility, use, occupancy, travel patterns, parking stress, seasonal peaks and opportunities for sustainable travel. Detailed requirements for other uses will be set out in supporting guidance.

	General Minimum Parking Standard: Houses: 2 spaces per dwelling as a general minimum, excluding garages unless the garage is of sufficient size to function as a usable parking space and additional on-curtilage parking is provided. Apartments: 1.5 spaces per dwelling as a general minimum, including an appropriate proportion of visitor parking unless otherwise justified by location, accessibility, tenure, dwelling size and parking stress evidence. Larger dwellings, family housing and specialist accommodation may require additional parking where justified by likely occupancy, car ownership, accessibility and local parking conditions. Parking provision must include additional provision for visitors, appropriate to the nature and scale of the development. HMOs should provide 0.25 car parking spaces per letting bedroom, with fractions rounded to the nearest whole number, unless robust evidence demonstrates that a different level is appropriate. Cycle parking should be provided at 1 space per letting bedroom. Town Centre and Accessible Locations Designated town centres: A reduced level of parking, including low-car or car-free development, may be agreed where this is justified by accessibility, parking stress evidence, public transport availability, active travel provision, town centre character and the availability of public or shared parking. Where parking standards are not met, additional sustainable transport measures will be required to offset parking demand for the lifetime of the development. Reduced parking provision must be robustly justified in a Transport Assessment or Transport Statement and Travel Plan, and may be secured through permit-free arrangements, parking management plans, legal agreements or other enforceable measures. Accessible locations outside designated town centres: A reduced level of parking may be agreed for sites within convenient walking distance of high-frequency public transport, local services

	and active travel routes. This will normally mean sites within 400m walking distance of a national rail station or a bus stop served by services operating at least every 20 minutes during the main part of the day, subject to consideration of route quality, gradients, barriers to movement and local context. In accessible locations outside designated town centres, reduced parking will normally be expected to provide at least 1 space per dwelling plus 0.5 spaces per dwelling for visitors, unless robust evidence demonstrates that a lower level can operate without unacceptable overspill parking or harm to highway safety, amenity or community safety. Where the standard cannot be provided, additional sustainable transport, shared transport, public transport or parking management measures will be required where they can adequately offset parking demand for the lifetime of the development.

Table 14: Zonal residential parking standards schedule

Standard	Town Centres	Accessible Corridors	All other areas	Notes and evidence requirements
Zone definition	Sites within designated town centre boundaries.	Sites within convenient walking distance of a bus stop served by the 12 or 22 bus service.	Sites outside designated town centres and outside Accessible Corridors.	Walking distance must be measured by a safe, direct and usable pedestrian route, not as the crow flies.
Houses	0 to 1 space per dwelling. Car-free or low-car development may be acceptable where justified.	1 space per dwelling plus visitor provision.	2 spaces per dwelling.	Garages should not normally count unless they are of usable dimensions and additional on-plot parking is provided.
Apartments	0 to 0.75 spaces per dwelling, subject to evidence and management.	1 space per dwelling plus 0.25 to 0.5 visitor spaces per dwelling.	1.5 spaces per dwelling, including an appropriate visitor allowance.	Lower provision must reflect dwelling size, tenure, accessibility, likely occupancy and local parking stress.

HMOs	Car-free or low-car provision may be acceptable where justified.	0.25 spaces per letting bedroom, rounded to the nearest whole space.	0.25 spaces per letting bedroom, rounded to the nearest whole space.	Cycle parking at 1 space per letting bedroom. Additional evidence may be required where streets are constrained.
Visitor parking	To be justified by evidence; may be omitted where public, shared or managed parking is available.	Normally 0.25 to 0.5 spaces per dwelling, depending on dwelling mix and local conditions.	Included within the apartment standard; separate provision may be required for houses and larger schemes.	Visitor spaces should be unallocated, clearly identified and managed for visitor use.
Blue badge parking	At least one accessible parking space for each wheelchair accessible dwelling. Where spaces are not initially laid out as accessible bays, sufficient space should be safeguarded for future adaptation. Visitor blue badge parking should be provided where visitor parking is provided.			Blue badge spaces should be closest to accessible entrances and served by safe, step-free routes.
Cycle parking	Residential development: 1 secure, covered and accessible cycle space per bedroom. HMOs: 1 space per letting bedroom. A proportion of spaces should accommodate adapted cycles, cargo cycles and trailers.			Cycle parking must be integral to layout and closer to entrances than general car parking where practicable.
EV charging	Where off-street parking is provided, active and passive electric vehicle charging infrastructure should be provided in accordance with current Building Regulations and local policy requirements.			Communal charging should be designed for safe, convenient and managed access.
Reduced parking evidence	Any proposal below the relevant standard must be justified through proportionate evidence, including local parking stress, car ownership, dwelling mix, tenure, accessibility, walking and cycling conditions, bus service quality, seasonal demand and likely occupancy.			Mitigation may include permit-free arrangements, parking management, car clubs, Travel Plans, public transport support and active travel improvements.

6.22 For the purposes of this schedule, “convenient walking distance” should normally be interpreted as up to 400 metres by a safe, direct and usable walking route. The distance

should be reduced where gradients, severance, poor footway conditions, lack of safe crossing facilities, lighting, personal security issues or other barriers mean that access to the bus stop is not genuinely convenient. Reduced parking provision in Town Centres and Accessible Corridors will not be accepted automatically; applicants must demonstrate that the development can operate without unacceptable overspill parking, highway safety impacts, obstruction of footways, harm to amenity or community conflict.

6.23 How to apply the schedule

1. Applicants should apply the zonal parking standards using the following staged approach. The level of detail required should be proportionate to the scale of development, the degree of departure from the relevant standard and the sensitivity of local parking conditions.
2. **Identify the correct zone.** Confirm whether the site is within a designated town centre, an Accessible Corridor, or All other areas. For Accessible Corridors, applicants must demonstrate that the site is within convenient walking distance of a bus stop served by the 12 or 22 bus service, measured by a safe, direct and usable pedestrian route.
3. **Apply the relevant starting standard.** Calculate the parking requirement by dwelling type, including houses, apartments, HMOs, visitor parking, blue badge parking, cycle parking and electric vehicle charging. Fractions should normally be rounded up unless the applicant can justify an alternative through a site-wide parking and management strategy.
4. **Consider the local context.** Review site-specific factors including local car ownership, existing parking stress, Controlled Parking Zones or residents' parking schemes, street width, footway conditions, gradients, access for emergency and refuse vehicles, seasonal demand, visitor accommodation pressures, town centre activity and the availability of public or shared parking.
5. **Justify any reduction.** Where provision is proposed below the relevant standard, the applicant must provide proportionate evidence that the development can operate without unacceptable overspill parking, highway safety impacts, obstruction of footways, harm to amenity or community conflict. Evidence may include parking surveys, car ownership data, accessibility analysis, dwelling mix, tenure, Travel Plan measures and parking management proposals.
6. **Secure mitigation where needed.** If reduced parking is accepted, mitigation may be required through planning conditions, obligations, legal agreements or other enforceable measures. This may include permit-free development, parking management, car club or shared mobility provision, enhanced cycle parking, public transport support, walking improvements, Travel Plan monitoring or contributions towards sustainable transport infrastructure.
7. **Design parking as part of placemaking.** Parking, servicing, cycle storage and charging infrastructure must be integrated into the layout from the outset. Parking should be safe, inclusive, accessible, overlooked where appropriate, well landscaped

and designed so that it does not dominate the street scene or interrupt pedestrian, cycle or public transport movement.

Community and Corporate Plan – Community and Place

Explanation

- 6.24 Parking standards need to balance the practical parking needs generated by development with the council's wider objectives for sustainable transport, good design, healthy places, town centre regeneration and climate change. The policy recognises that many residents, visitors and businesses will continue to need access to motor vehicles, particularly in less accessible locations and during seasonal peaks. It therefore seeks to provide adequate, usable and well-designed parking while ensuring that parking provision does not undermine active travel, public transport, efficient use of land or the quality of the built environment.
- 6.25 A flexible, evidence-led approach will be taken where lower levels of parking are proposed in designated town centres, accessible locations and sustainable transport corridors. Such reductions will only be acceptable where they are supported by robust evidence and secured mitigation. This may include high-quality cycle parking, car club or shared mobility provision, public transport support, travel planning, parking management, permit-free arrangements or financial contributions towards sustainable transport. These measures must be additional to the normal sustainable transport requirements of development and should be capable of being monitored and maintained over time.
- 6.26 Changes of use, conversions, HMOs, visitor accommodation and high traffic-generating uses will be particularly scrutinised where they could intensify parking demand or alter existing parking patterns. Applicants may be required to provide parking stress surveys, parking management plans, servicing plans or seasonal assessments where local circumstances indicate a risk of overspill parking, community conflict, highway safety impacts or harm to local character. In Torbay, particular regard should be given to peak summer visitor demand, town centre conditions, constrained streets, topography and the needs of disabled people, servicing vehicles and emergency access.
- 6.27 The layout and design of parking should be considered as part of the overall placemaking strategy for a site. Car parks, parking courts and on-plot parking should be accessible, safe, overlooked, well landscaped and designed to minimise visual dominance. Parking should support, rather than interrupt, pedestrian and cycle movement. Large areas of surface parking should incorporate appropriate tree planting, sustainable drainage, permeable materials, lighting, boundary treatment and clear routes to entrances. Parking

and servicing areas should be designed so that they do not obstruct footways, cycle routes, public transport infrastructure or the safe movement of larger vehicles.

- 6.28 Further supplementary guidance should set out detailed parking standards by land use, accessibility zone and development type, together with design requirements for parking bays, garages, cycle parking, blue badge spaces, electric vehicle charging, delivery and servicing, car clubs, shared mobility, parking stress surveys and management plans. This will allow the Local Plan policy to establish the core principles while giving the council flexibility to update technical standards as travel behaviour, vehicle technology and local evidence change.

Chapter 7: Building for the future - Resilient and smart infrastructure and developer contributions



Figure 16 - Building for the Future

Strategic Policy INS: Sustainable infrastructure

All development will be expected to provide the physical, social and environmental infrastructure needed to make it acceptable in planning terms. A range of physical, social, green and blue infrastructure will be sought in order to help Torbay grow in a sustainable, healthy, safe, and prosperous way.

Development must:

- i) Provide or contribute to the infrastructure required to meet the needs that development generates, having regard to its scale, type and location.
- ii) Ensure timely delivery, including phasing where necessary, so that infrastructure is in place to support development.
- iii) Prioritise sustainable delivery and outcomes, including climate resilience, biodiversity enhancement, sustainable transport and healthy, inclusive communities.
- iv) Provide infrastructure on-site where possible and appropriate

Development that does not meet critical infrastructure requirements such as those including, but not limited to, flood defence works, highway safety, water and sewer capacity, and/or ecological/environmental improvements to meet Habitats Regulations requirements will not be supported.

Where onsite provision of infrastructure is not possible or appropriate, developer contributions will be sought to achieve offsite provision in accordance with the hierarchy set out in Policy IN1. A planning obligation will be required to secure the infrastructure necessary to make development acceptable in planning terms.

New Infrastructure Projects

The council will take a supportive approach to the development of new or improved infrastructure meeting the needs of the Bay, particularly infrastructure that is of strategic importance, subject to an assessment of the proposal's impacts including on amenity, the natural environment (including any European Wildlife Sites), landscape character, and the historic environment, and any necessary mitigation measures.

In the planning and design of infrastructure projects, opportunities to co-deliver environmental benefits (including habitat creation, ecosystem services (as defined in

Glossary), and social benefits (including increased opportunities for social interaction, active travel and outdoor recreation), should be maximised.

Community and Corporate Plan – Pride in Place

Explanation

- 7.1 The full range of physical, social and green and blue infrastructure projects needed over the plan period will be set out in an Infrastructure Delivery Plan, developed with input from infrastructure providers. The Local transport Plan, Local Cycling Walking Infrastructure Plan, Bus Service Investment Plan and The Torbay Green Infrastructure Delivery Plan also set out green and blue infrastructure needs.
- 7.2 The Torbay Local Plan 2012-30 was supported by an Infrastructure Delivery Study (PBA 2013) that outlined Torbay's infrastructure needs. This will be updated as part of the Local Plan preparation and a new Infrastructure Delivery Plan produced.
- 7.3 Most of Torbay's infrastructure requirements are likely to fall within Torbay Unitary Authority's boundaries. Wider infrastructure such as water and electricity supply are covered by other regulatory and funding regimes. The need for cross-boundary infrastructure contributions will be kept under review, but are not currently proposed. The exception to this is likely to be where development affects Habitats Regulations matters.
- 7.4 There are likely to be different ways in which infrastructure can be provided. The council will seek in particular the delivery of environmentally friendly infrastructure, such as sustainable drainage, water efficiency measures and renewable energy/micro generation solutions, so long as these have major biodiversity and recreation benefits and do not prejudice the effective operation of infrastructure or community safety.
- 7.5 The infrastructure needs arising from a development will usually need to be met on-site through provisions made directly as an integral part of the development. Where appropriate, this will be regulated through planning condition or legal agreement. The council's preferred means of achieving this will be for on-site infrastructure (notably including all internal roads and open spaces) to be transferred into the council's ownership with financial contributions towards the council's ongoing management and maintenance costs.
- 7.6 Where safe and practical to do so, all infrastructure provided on-site will be publicly accessible, and will be supported by the necessary management arrangements to ensure that infrastructure is well maintained and fit for purpose for its lifetime.

- 7.7 Where onsite provision of infrastructure is either not possible or not appropriate (such as sewage treatment or some nature based solutions), developer contributions will be sought to achieve offsite provision, in accordance with the hierarchy set out in Policy IN1.
- 7.8 Infrastructure and service delivery should advance equity and should help close the gap between the most and least disadvantaged neighbourhoods and communities within the Bay. It is important that infrastructure facilities and services are well located in relation to need, and are accessible, useable and safe for all. It is important that, where negative impacts associated with new infrastructure are unavoidable, these impacts are fairly and equitably distributed, and that vulnerable or disadvantaged groups are not disproportionately burdened.
- 7.9 Torbay is a Critical Drainage Area, and flooding, coastal change management and sewer capacity are increasingly important infrastructure issues in the Bay. The council will require that all development contributes towards reducing the volume of water entering the combined sewer system through a range of strategies including designing in water efficiency measures to reduce water consumption, promoting the use of sustainable drainage systems, and increasing the permeable area of development sites. Local Plan policies on drainage, water management and flood risk set out the council's requirements in this regard in more detail.

Strategic Policy IN1: Prioritisation of planning obligations

Where possible and appropriate infrastructure will be provided onsite in accordance with Policy IN1. Developer Contributions will be sought for the provision of infrastructure, affordable housing and other matters required to make development sustainable in planning terms. Where S106 contributions are argued to make development unviable, an independent assessment of viability will be required, proportionate to the scale of the proposal before S106 requirements are relaxed. Where a reduction in contributions is agreed due to viability constraints, the following order of priority will be taken into account when reducing contributions.

Contributions will be sought on the basis of the impact of the specific development and needs arising from it. In seeking developer contributions, the following order of priority will apply:

- vi) Site Deliverability Matters: The provision of critical infrastructure, e.g. flood defence works, highway safety, water and sewer capacity, and/or ecological/environmental improvements to meet Habitats Regulations requirements, and monitoring of obligations**

vii) Healthy Environments including active travel and green and open space.

viii) Affordable housing

ix) Employment and Healthcare contributions

x) Broader Sustainable Development Contributions (Public transport, Education, Lifelong learning, community facilities, Policing), offsite waste management, sports pitches and offsite open space

Where development pays CIL an equivalent reduction from Broader Sustainable Development Contributions will be granted.

Where policy requirements are not met due to an agreed viability reason, the s106 Agreement will include mechanisms for the deferred calculation of viability to ensure that developers meet their policy obligations where the viability of the development has improved at a later date.

Community and Corporate Plan – Pride in Place

Explanation

- 7.10 Developer contributions towards infrastructure delivery will be sought in the form of the community infrastructure levy and/or section 106, as described in more detail in the council's adopted CIL Charging Schedule, the Planning Contributions and Affordable Housing Supplementary Planning Document, and/or any subsequent local planning documents.
- 7.11 Developer contributions may be pooled towards the delivery of strategic infrastructure elsewhere within the Bay where this would constitute the most effective and equitable means of meeting the infrastructure needs arising from the development.
- 7.12 Policy IN1 seeks to set out the council's priorities for S106 Contributions. More details are set out in the Planning Contributions and Affordable Housing Supplementary Planning Document (currently 2022, which will be updated as a supporting document to the Local Plan).
- 7.13 Policy IN1 sets out the following priority order for Planning Contributions:
1. Site Deliverability Matters. Critical infrastructure (also called "integral infrastructure"). This is physical and enabling infrastructure, which must be delivered on time to allow proposed development to proceed in narrow physical or safety terms (e.g. road access, flood defence works, sustainable drainage,

sewerage capacity, water and electricity). Contributions for ecological mitigation etc. which are necessary to make development comply with Habitats Regulations requirements, particularly affecting the SAC, Marine SAC and Biodiversity Net Gain, will be treated as critical infrastructure. Where possible this will be delivered onsite although it may be covered by a S278 Highway Agreement or part of a S106 Agreement. The council's preferred method of delivery is through transfer of open space, highways etc to the council for adoption, with a maintenance and monitoring fee.

2. Healthy Environments. This includes the provision of accessible route for active travel, permeability between the site and nearby facilities, the provision of open space etc. Where possible this will be delivered onsite and should be integral to the design of development. although it may be covered by a S278 Highway Agreement or part of a S106 Agreement.
3. Affordable Housing Contributions. This is covered in more detail in Policy H7 Employment, Town Centre Regeneration. These will be sought to mitigate the impact of proposals that have an impact on town centres or result in the loss of employment. See Policies E5, TO7 TC9 in Chapter 4.
4. Wider sustainable development contributions. These are sought to support the infrastructure and other requirements that development generates a need for. Whilst not necessary to make development stand up or remain safe in narrow physical terms, such infrastructure is required to make development acceptable in planning terms. This covers public transport contributions, Education and Lifelong Learning, Health facilities, community wellbeing, spiritual and safety facilities, off-site provision of Playing pitches and strategic recreation facilities, offsite waste management facilities.

7.14 The above priority list is a starting point only, and each application must be assessed on its merits to determine what obligations are necessary to make the proposal acceptable in planning terms, directly related to the proposal and fairly related to the scale and kind of development. For example education contributions will not be sought from development of older peoples' accommodation, although this may attract a higher level of healthcare contribution.

7.15 Developer Contributions are usually provided through S106 Obligations, although conditions will be used where possible. The use of S106 Obligations is regulated by the Tests of Lawfulness set out in Regulation 122(2) of the Community Infrastructure Levy Regulations (2010 as amended) and the NPPF (paragraph 58 of the 2024 Framework). These require that obligations are:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

- 7.16 Mitigation will be provided from Sustainable Development Contributions for affordable housing provided through s106 Contributions or other mechanism that secure the housing as affordable in perpetuity.
- 7.17 The council adopted a Community Infrastructure Levy (CIL) in 2017 and this will be updated as part of the Local Plan Update. Where development pays CIL the amount of CIL paid will be deducted from the Sustainable Development Contribution liability. However, Site deliverability matters must still be met irrespective of CIL. It is important that mandatory CIL relief for social housing and other matters is sought before development is commenced.

Viability Issues

- 7.18 Whilst Torbay is a high-need area, it is not a particularly high value area, and the council recognise that development should be viable.
- 7.19 A Whole Plan Viability Assessment is being prepared as part of the Plan preparation. Therefore, all developments are expected to meet policy requirements and developer contributions in full under normal market conditions. It is not possible for the Torbay Local Plan to anticipate extraordinary events that may occur during the plan period, and therefore it is accepted that abnormal costs or other circumstances may arise which impact upon viability to the extent that the full range of policy requirements and planning obligations set out in the local plan cannot be met.
- 7.20 Where planning contributions are argued to render development unviable, a viability appraisal of the development proposal will need to be submitted by applicants. For major developments, the council will obtain an independent review of the submitted viability appraisal and will recover from the applicant its reasonable costs in doing so. The submitted viability appraisal and the independent review will be published by the local planning authority with the planning application documentation.
- 7.21 The council will publish an updated Planning Contributions and Affordable Housing Supplementary Planning Document (SPD) to support the Local Plan to expand upon the principles set out in Policy IN2. In the interim, the 2022 SPD will continue to apply. The council is entitled to charge a 5% administration fee for developer contributions and will update the figures for inflation.

Policy IN2: High quality communications and digital connectivity

To the door fibre

All proposals for residential and commercial development should be designed to connect to high quality communications infrastructure including to the door fibre optic cabling. Where this is not possible, evidence will be required to show why the provision is not technically feasible.

Other ICT development

The introduction and installation of the most up to date and fastest telecom and other Information and Communications Technology (ICT) will be supported by the Local Plan. Applications for ICT developments will be supported where the following criteria are met:

- i) The opportunity to accommodate apparatus on an existing mast or structure in preference to new masts or structures has been fully explored;
- ii) Telecommunication apparatus and associated structures have been sited and designed in order to seek to minimise impact on the visual amenity, townscape, character and appearance of the surrounding area;
- iii) Development does not have an unacceptable impact, including cumulative impact, on residential amenity, landscape character or wildlife;
- iv) Existing landscape features have been utilised and/or an appropriate landscaping scheme has been prepared to minimise the impact on the visual amenity, character or appearance of the surrounding area;
- v) If on a building, apparatus and associated structures should be sited and designed in order to minimise impact to the external appearance of the host building; and
- vi) Underground facilities and ducts should be sited and laid to minimise harm to tree roots or areas of archaeological importance.

When considering proposals for telecommunications or other ICT equipment, the council will consider the operational requirements of telecommunications networks. It will be a condition of any approval given that any telecommunication apparatus and associated structures that subsequently become redundant will be permanently removed from the site and that land will be reinstated to its former condition or in accordance with details to be previously agreed with the council.

Explanation

- 7.22 There has been a huge expansion in telecommunications and computing in recent years. Internet connectivity is now considered an integral part of everyday life and crucial to the success of most business operations. With the emergence of new services such as 5G services, streaming, the internet of things, home working and the expansion of internet capable devices, there is likely to be a continued very large increase in demand for bandwidth and persistent internet connection.
- 7.23 The Plan cannot predict the future of technology although it is relatively certain that technological changes will happen quickly. It is important that the planning process is proactive in supporting and encouraging ICT networks to maximise their economic and social benefits.
- 7.24 Policy IN2 sets out a supportive policy for Communications infrastructure, whilst seeking to minimise the impact of such equipment and making provision for sharing of masts etc. and the removal of redundant equipment.

Chapter 8: Climate Change - Our sustainable and resilient future

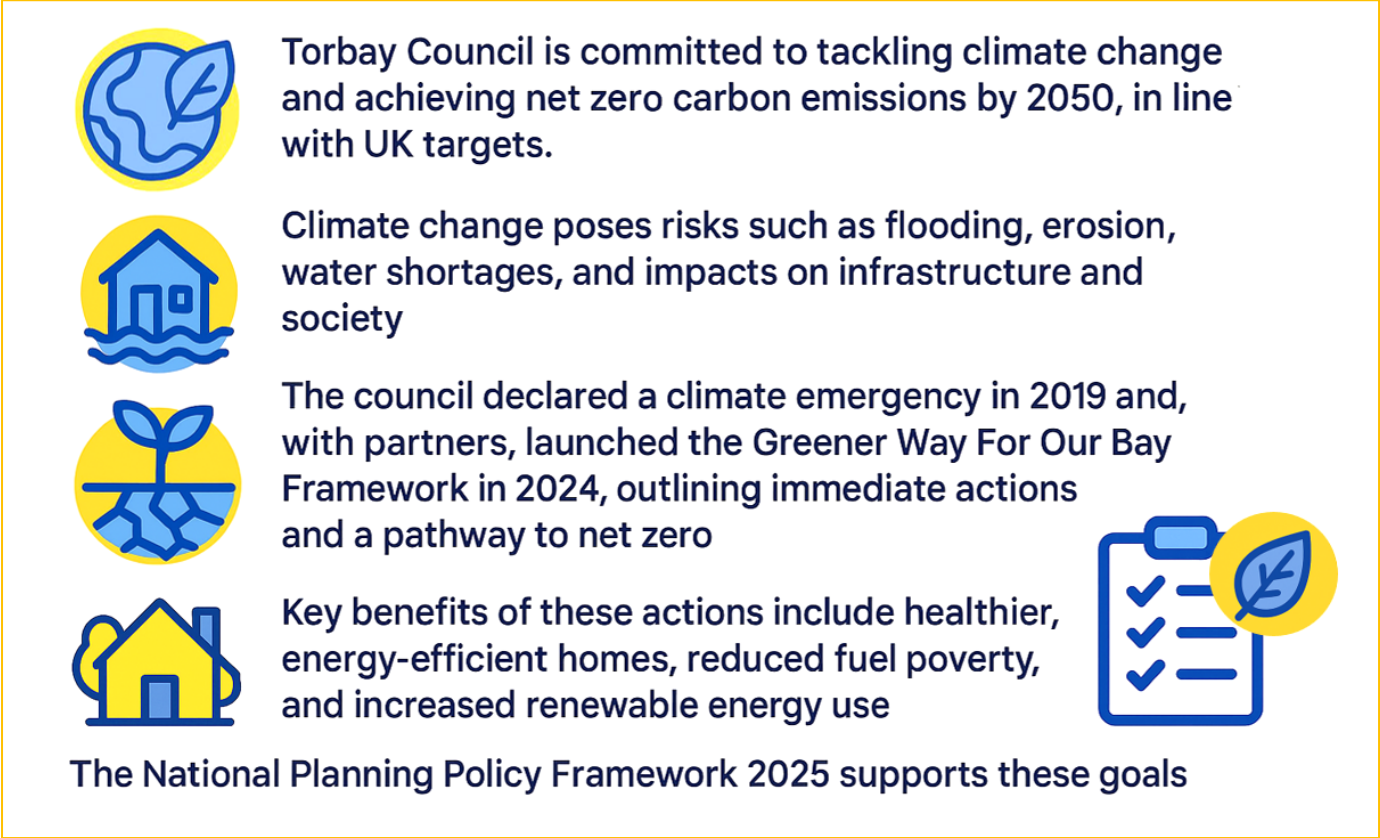


Figure 17 - Climate Change

Introduction

- 8.1 A healthy, happy and prosperous Torbay for all is what Torbay Council’s Community and Corporate Plan aims to achieve by 2040. Ensuring that our residents and businesses are able to adapt to a changing climate is an important part of achieving this vision for Torbay. This is why our Corporate Plan commits the council to continue to tackle the climate emergency for a sustainable future.
- 8.2 Beyond natural processes, humans have contributed to the release of more and more carbon dioxide emissions (and other greenhouse gases) into the air. This causes global temperatures to rise, resulting in long-term changes to the climate, known as climate

change¹. This means that our planet is facing huge environmental challenges. Our economy and society are also experiencing the impacts of a changing climate. Devon may face more river and surface water flooding, coastal flooding and erosion, reduced water availability, temperature change and extreme heat/cold and a range of negative impacts to key infrastructure, services and our wider economy and society (**Devon Cornwall and Isles of Scilly Adaptation Strategy**).

- 8.3 To help play our part in reducing carbon dioxide emissions and to prepare Torbay for a changing climate, Torbay Council declared a climate emergency in 2019 and, with partners, will work towards creating a net zero carbon Torbay² by 2050.
- 8.4 This target is in line with the current UK government's net zero target by 2050. This is incredibly challenging. Success will only be achieved through all organisations, individuals and institutions playing their part. In 2024, The Torbay Climate Partnership approved the **Greener Way For Our Bay Framework and Action Plan**<https://www.torbay.gov.uk/council/greener-way-for-our-bay/> (GWFOB). This outlines a pathway to a net zero carbon Torbay by 2050 and a set of immediate actions to be carried by a range of partners across Torbay. This Local Plan needs to play a part in achieving a net zero carbon Torbay by 2050. A range of policies throughout the plan aim to reduce the amount of additional carbon emissions arising from new development and prepare and build climate resilient developments.
- 8.5 Many actions that help tackle climate change and reduce energy use and carbon emissions will also have a number of other benefits, like helping create warm, healthier homes, free from damp and mould in winter, alleviating fuel poverty³ by creating homes that use less energy and have lower energy bills and through renewable energy generation, homes that have their own resilient source of clean energy, with less reliance on imported energy.
- 8.6 The National Planning Policy Framework 2025 outlines that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts. It

¹ Climate change refers to a large-scale, long-term shift in the planet's weather patterns and average temperatures (MET Office). For more on climate change, what's causing it and the evidence to support it please visit [What is climate change? - Met Office](#)

² Torbay will reduce its greenhouse gas emissions by 100% from 2008 levels by 2050

³ With regards to a person in a fuel poverty, this is someone on a low income, that cannot keep their home warm at a reasonable cost.

should also help to shape places in ways that contribute to radical reductions in greenhouse gas emissions.

- 8.7 The following policy therefore plays a key role in ensuring that new developments make a full contribution towards meeting the GWFOB priority actions of making new buildings that are nice to live and work in, designed to limit the impact on the environment and help Torbay, and the wider UK, increase resilience to a changing climate and contribute towards the transition to net zero carbon by 2050. It also will help create future developments that are good for the occupants and are warm, healthy, developments that generate their own energy and have lower energy bills.

Strategic Policy CERS: Climate resilient, net zero carbon developments

All development proposals will be required to be resilient to climate change and minimise carbon dioxide and wider greenhouse gas emissions.

Proportionate to their scale, they must minimise greenhouse gases, including carbon dioxide, and demonstrate how they:

- a. Apply a climate resilient approach to ensure the development is adapted to cope with a changing climate, including design to minimise overheating, use water efficiently and utilise green and blue infrastructure to help cool external spaces**
- b. Minimise the risk and impact of flooding (including coastal where appropriate), through the location of development and including the use of nature-based solutions e.g. using sustainable drainage of surface water using features such as rainwater harvesting and reuse, infiltration areas, soakaways, porous pavements, attenuation wetlands and tree pits, green roofs/walls.**
- c. Minimise heating and cooling energy demand and associated emissions of greenhouse gas emissions, using layout, orientation and built form**
- d. Apply a fabric first approach to maximise energy efficiency**
- e. Maximise renewable and low carbon energy generation⁴**

⁴ Use of appropriate technologies such as heat pumps, solar thermal / photovoltaic panels, wind turbines + others that are suitable to the location

- f. **Maximise water efficiency and seek to achieve a water efficiency standard of no more than 100 litres per person per day**
- g. **Minimise the use of materials and creation of waste and promote opportunities for a circular economy**
- h. **Maximise opportunities to enable travel by sustainable means by prioritising integrated, accessible and inclusive development that reduces reliance on private motor vehicles, in accordance with Policies TAS and TA1.**
- i. **Achieve a minimum of 10% measurable biodiversity net gain and ensure that on-going management measures are in place**

Proposals will be required to submit an Energy and Climate Change Statement, proportionate to the scale of the proposal indicating how requirements a- i above are to be met. As part of their wider Energy and Climate Change Statement, major developments will also need to include a climate resilience assessment and a transport assessment and travel plan.

Community and Corporate Plan – Climate Resilience

Explanation

- 8.8 The NPPF requires plans to take a proactive approach to mitigating and adapting to climate change (See NPPF 2025 paragraph 162). Plans should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 8.9 Making sure Torbay is healthy, happy and prosperous for all will require new development to be able to cope with a changing climate and minimise associated economic and social impacts, whilst working towards reducing area-wide carbon emissions.
- 8.10 The GWFOB contains 10 priority actions and takes a long-term approach to mitigate emissions and adapt to climate change. In line with this framework's priorities to make a) new buildings that are nice to live and work in, b) designed to limit the impact on the environment, c) promote and increase the uptake of renewable energy generation, d)

provide a range of low carbon, affordable and accessible transport, e) make our naturally inspiring coast and countryside help tackle climate change, this policy brings together the NPPF's and GWFOB's key elements to ensure development prepares for local climate impacts and supports the transition to net zero carbon by 2050.

- 8.11 New homes and commercial properties should be designed to adapt to a changing climate. They should be appropriately resilient to the impact of storm events including the effects of driving rain, high winds and surface water flooding and heat events. New buildings will need to also limit their propensity to overheat by optimising orientation, shading and layout.
- 8.12 The provision of green and blue infrastructure can play an important part in helping to build climate resilience into developments. In the form of landscaped spaces, tree cover, green roofs and walls, all can be used to lessen overheating through shading, reduce storm water run-off, reduce external ambient temperatures and improve biodiversity. Major developments are required to submit a detailed Climate Resilience Assessment covering how the development has been assessed for a changing climate and measures to be introduced to increase climate resilience. As a minimum this must cover a, b, c and f above. The **Met Office's Local Authority Climate Service** can assist developers understand how the local climate of Torbay will change up to 2100.
- 8.13 Creating homes and buildings that use little to no energy, use energy efficiently and generate energy from low/renewable energy sources are vital to achieving net zero carbon by 2050. Locally, it will also help to create thermally comfortable homes, reduce cold-home related illness, reduce energy bills and reduce the numbers of homes in fuel poverty.
- 8.14 Building Regulations have been improved to conserve energy and reduce carbon emissions. The government's Future Homes Standard seeks to deliver homes that are zero carbon ready from 2025. The government has also set out a new Future Buildings Standard which provides a pathway to deliver new non-domestic buildings that are zero carbon ready from 2025. At the time of writing we are still awaiting the implementation of these new standards from 2027. The council will keep the government's progress in achieving these standards under review.
- 8.15 Maximising onsite renewable energy generation through technologies such as solar photovoltaic panels and air, water or ground source heat pumps will cut emissions through provision of low/zero carbon forms of energy generation and help the occupant to have lower electricity bills. Community-led renewable and low carbon energy schemes also

⁵ Expected Autumn 2025

have an important role to play in our net zero carbon transition and are encouraged to come forward.

- 8.16 Water efficiency is about reducing our use of water and the effect our homes and buildings have on water resources. The effects of climate change may increase the pressure on water resources. Torbay already faces hose pipe bans during times of low water availability. Warmer summers are likely to increase water consumption and reduce available supply.
- 8.17 Pressure on water supplies can be addressed in part by water efficiency measures to reduce consumption. Improving the efficiency of water use, has multiple benefits of reducing bills whilst also reducing the need to extract and treat water from the environment and reducing the amount of water flowing into the sewer system, thereby helping to protect the environment, reduce carbon production and reduce flood risk. Water efficiency measures may include dual flush toilets, low flow bathroom and kitchen fittings, low water consumption appliances, grey water and water recycling systems, water butts and other on-site water retention systems. All development will achieve a water efficiency standard of no more than 100 litres per person per day.
- 8.18 Development should follow the waste hierarchy and reduce waste, reuse or recycle waste generated on site. Disposal of waste should be the last option.
- 8.19 The circular economy, which involves sharing, leasing, reusing, repairing, refurbishing and recycling existing materials and products for as long as possible, is important. Developments should choose materials that can be used again and again, reduce waste and the associated manufacturing and transport-related carbon emissions. In accordance with the principles of the circular economy, any infrastructure and development should be underpinned by sustainable waste management, whether it be in relation to construction or ensuring that new homes have appropriate layouts for waste collection services.
- 8.20 Increased traffic volumes are likely to arise from new developments and if not managed effectively are likely to cause localised pollution and congestion, increase greenhouse gas emissions and reduce the attractiveness of an area for others. New developments must mitigate these traffic impacts. Measures designed to enable people to make sustainable travel choices, such as developments designed for pedestrians with provision of cycle lanes, access to and improved local buses, car clubs, car sharing and electric charging plug-in points can all assist with reducing transport impacts.
- 8.21 In addition to the submission of an Energy and Climate Change Statement, Major developments will be required to demonstrate they have maximised opportunities for sustainable travel and will make adequate provision to mitigate the likely impacts of traffic through provision of a transport assessment and travel plan. All other developments generating new or additional journeys will be required to submit a transport statement

unless there are significant transport implications arising. Particular attention should be had to Local Cycling & Walking Infrastructure Plan containing priority walking, wheeling and cycling routes, and the bus service improvement plan with network and infrastructure enhancements.

- 8.22 New planning implementation guidance/ or similar will be developed to provide further guidance.

Policy CER1: Net zero carbon development standards

- a. From adoption of the Plan, all developments will have the following requirements:
 - residential development, as a minimum, to achieve a 75% carbon dioxide emissions reduction from that required under Part L of the 2013 Building Regulations.
 - non-domestic development, as a minimum, to achieve:
 - A fabric standard at least as good as that required under the current Building Regulations;
 - Heating using a heat pump or heat network (which does not utilise fossil fuel); and
 - Solar PV panel coverage equivalent to 40% of the building's foundation area for both side-lit and top-lit zones
- b. **b. In addition** future growth areas and all major greenfield sites (10 dwellings or 1000 sqm) **will be required to achieve net zero carbon emissions** through solar PV or other measures. **New development should connect to an energy network where there are existing proposals or schemes.**
- c. **Any major, high-density future growth area or greenfield site (10 dwellings or 1000 sqm) with expected high heat demand must demonstrate that consideration has been given to whether it is feasible and viable to develop a local energy network. Given the scale of development likely to come forward, local energy network assessments are required in the Torquay Gateway and West Paignton SDT policies.**
- d. **Major Non-Residential Development will be required to meet the most up to date BREEAM 'Excellent' standard. Where the 'Excellent' Standard cannot be achieved, evidence must be submitted with an application to**

the satisfaction of the council. The BREEAM 'Very Good' standard must be met as a minimum.

- e. For all development (including hotels) proposals which involve the change of use or redevelopment of a building, or an extension to an existing building, resulting in a change in energy status⁶ the proposal will be required to demonstrate in the Energy and Climate Change Statement how energy demand has been reduced to the lowest practical level using energy efficiency measures, heating/cooling systems have been selected for their energy performance and that on-site renewable energy will be installed unless evidenced to be unfeasible.

Significant weight will be given to the benefits of development resulting in considerable improvements in line with industry best practice approaches such as Net Zero Operational Carbon and to the energy efficiency and reduction in carbon emissions in existing buildings.

All development must submit an Energy and Climate Change Statement to the local planning authority for approval and implementation, demonstrating how they fulfil the principles of a –e above.

A New planning implementation guidance/ or similar will be developed to provide further guidance.

Community and Corporate Plan – Climate Resilience

Explanation

- 8.23 The GWFOB aims to create priorities to make new buildings that are: a) nice to live and work in b) designed to limit the impact on the environment and c) locally, increase the uptake of renewable energy generation. To achieve this The Torbay Local Plan is likely to be adopted around the introduction of the Future Homes Standard (FHS) and the Future Building Standard (FBS),. These Standards are being introduced by the government to deliver highly efficient homes and buildings which are zero carbon ready,

⁶ A change to the energy status is when a building was previously exempt from the Building Regulations energy efficiency requirements but now is not. The change to energy status applies to the building as a whole or parts of the building that have been designed or altered to be used separately. For example, when a previously unheated space becomes part of the heated building

permission, will be supported where proposals avoid unacceptable impacts upon amenity and the natural, historic and built environment.

- 8.30 It is expected most buildings will achieve net zero carbon through achieving the Future Homes/Building Standard plus the installation of additional roof mounted solar PV panels, where appropriate, feasible and viable. Net zero refers to having zero regulated carbon dioxide (CO₂) emissions associated with a building's annual operational energy consumption. Achieving net zero will require the combination of constructing a highly energy efficient building using a fabric first approach, plus on-site or connection to off-site renewable electricity generation. It will require the annual generation of onsite zero carbon electricity to balance energy consumption from 'regulated' energy. Regulated emissions include CO₂ emissions arising from energy use regulated by Part L of the Building regulations (e.g. space heating, domestic hot water, fixed lighting etc).
- 8.31 Policy CER1b seeks to facilitate delivery of net zero carbon homes as soon as possible, prioritising fabric improvements which bring thermal comfort and lower energy bills, through for instance, high efficiency glazing and minimal heat loss from walls, ceilings and roofs. Where schemes cannot achieve all the requirements through fabric improvements, 'top-up' solutions are permissible such as Solar PV arrays to generate low carbon electricity, and finally payments to an approved carbon offsetting fund where necessary. Carbon offsetting should be considered only as a 'last resort'. A Torbay fund will be established and administered by the council and will be collected via Section 106 agreements. Funds will be allocated to low carbon projects within Torbay, where additionality is clear, focussing on retrofitting existing housing stock, with a focus on lower income households and community energy projects. The council will prepare the terms for a carbon offsetting fund with external partners and further guidance will be published.
- 8.32 Local energy networks⁹ can play a role in helping an area to meet its net zero carbon ambitions. They use less energy and emit less carbon emissions by co-producing heat and power which is shared across a network to heat and power buildings. To date, Torbay does not have any large local energy networks. Major development should connect to such networks or communal heating networks where they arise in the future.
- 8.33 Any large scale residential or non-residential development must demonstrate that consideration has been given to whether it is feasible and viable to develop, or be connected to, a local energy network.

⁹ Decentralised low carbon heat generation using district heating or communal heating networks to distribute heat locally.

- 8.34 There is no exact formula for determining if a new development is suitable for the development of a new local energy network. However, major, high-density mixed development proposal with an anticipated high heat demand will lend themselves to such networks, especially if in close proximity to sites with excess waste heat or areas with known natural heat sources such as underground geothermal heat. Given the scale of development likely to come forward across Torbay, a site-specific local energy network assessments is required for development that comes forward within the Torquay Gateway and West Paignton areas (See policies SS1, SDT2, and SDP3) and all future growth areas or greenfield site (10 dwellings or 1000 sqm) .
- 8.35 All Major, non-domestic, developments are also required to meet BREEAM standards. This is a well-established and measurable means of delivering the policy outcomes above, and to achieve a sustainable development that minimises a range of other environmental impacts.
- 8.36 Energy and Climate Change Statements are also required for conversions and material change of use applications, where the conversion to a new use, will result in a change in energy status. Change to energy status is defined in regulation 2 (1) of the Building Regulations 2010 or most up to date version. A change to the energy status is when a building was previously exempt from the Building Regulations energy efficiency requirements but now is not. The change to energy status applies to the building as a whole or parts of the building that have been designed or altered to be used separately. For example, when a previously unheated space becomes part of the heated building.
- 8.37 All development must submit an Energy and Climate Change Statement to the local planning authority for approval and implementation, demonstrating how they fulfil the principles of a –f above.

Policy CER2: Embodied carbon reduction and assessment

All new development will be expected to demonstrate how they will minimise embodied carbon emissions.

Proposals for major development will be required to include an embodied carbon assessment as part of the Energy and Climate Change Statement. This assessment must use a nationally recognised embodied carbon assessment methodology and demonstrate actions taken to reduce embodied carbon emissions.

All development, including demolition that involve one-for-one replacement of existing dwellings must demonstrate why it is not feasible or viable to refurbish existing dwelling(s).

All applications must demonstrate how these requirements are to be met in an Energy and Climate Change Statement

Community and Corporate Plan – Climate Resilience

Explanation

- 8.38 Embodied carbon emissions are those typically associated with any processes, materials or products used to construct, maintain, repair, refurbish and repurpose a building and eventual material disposal.
- 8.39 Embodied carbon from the construction and refurbishment of buildings currently makes up 20% of UK built environment emissions¹⁰. As operational emissions from buildings continue to reduce, embodied emissions will make up a greater proportion of a building's total carbon emission. Work carried out for the Royal Institution of Chartered Surveyors suggests that embodied carbon currently makes up between 35% and 51% of a building's total emissions, rising to 70% as operational energy decarbonises¹¹. For this reason, the Local Plan seeks to start to address this increasing issue. Reducing embodied carbon emissions is extremely hard to achieve. This policy aims to introduce consideration of these emissions and actions to reduce them. No target is set through this policy but ensuring embodied carbon emissions are reduced as far as possible through good design and planning, will make a significant difference to reducing embodied carbon emissions and further support the transition to net zero by 2050.
- 8.40 Developments should:
- a) be encouraged to prioritise the renovation or retrofit of existing structures, as part of an efficient use of land, and subject to other local plan considerations
 - b) select highly efficient building design and quality materials and systems which:
 - Have low embodied carbon, including transport emissions;
 - Minimise the need for replacement over the lifetime of the development;

¹⁰ [Embodied Carbon | UKGBC](#)

¹¹ [WoE-net-zero-new-build-policy-evidence- FINAL.pdf](#)

- Can be reused, recycled and disposed of sustainably at end of life;
- c) Ensure that materials are reused and recycled whenever possible, and that waste is minimised in design. Ensure that this is designed in from project inception to completion.
- d) Ensure that new buildings are flexible and adaptable to future uses, reducing the need for future redevelopment.
- e) All development, including demolition that involve one-for-one replacement of existing dwellings must demonstrate why it is not feasible or viable to refurbish existing dwelling(s). Where it is not feasible or viable a clear plan must be in place to demonstrate that adequate steps have been taken in the design of the new development to reduce embodied carbon and impacts.
- f) Demolition of historic buildings which are in a state of considerable disrepair will only be acceptable where robust evidence can be provided to the satisfaction of the local planning authority that the building has not suffered from neglect and that the repair and reuse of the building would not be viable or that significant public benefits, including a lower net-carbon solution for the site to outweigh the heritage harm caused, can be delivered.

8.41 Given the impact a major development can have on embodied carbon emissions, they will also be required to include an embodied carbon assessment as part of the Energy and Climate Change Statement. To calculate embodied carbon emissions, a nationally recognised embodied carbon assessment methodology such as RICS and conform to BS EN 15978. All submissions should also demonstrate actions taken to reduce identified embodied carbon emissions. An Embodied Carbon Delivery Checklist will be developed to help all major developments meet this requirement.

Policy CER3: Heritage assets and climate adaptation

Proposals that help to increase resilience to climate change and secure a sustainable future for historic assets and non-designated heritage assets will be supported where they:

- a. preserve or enhance the significance of the asset
- b. facilitate their sensitive re-use where they have fallen into a state of disrepair or dereliction (subject to such a re-use being appropriate to the specific heritage asset)

Explanation

- 8.42 Within Torbay there are 24 conservation areas, 13 scheduled monuments and approximately 865 listed buildings as well as numerous non-designated heritage assets, so it is vital that they play a role in contributing towards Torbay’s net zero carbon target by 2050 (and so buildings can become warm, healthy and with lower energy bills).
- 8.43 To safeguard our heritage assets and to sustain our cultural heritage for future generations, our heritage assets need to be adaptable to, and protected from, the effects of climate change. Historic buildings can also positively contribute towards reducing carbon emissions through sensitive and sympathetic adaptations that secure their retention, repair, retrofit and reuse alongside the conservation of their significance. The embodied energy (the energy used within the materials and construction activities) in historic buildings means that their retention aligns with the ambition to reduce carbon emissions and the priority to conserve heritage assets.
- 8.44 Sympathetic adaptation that preserves the building is required to improve energy efficiency, reduce emissions, enable renewable energy generation and/or enable the building to adapt to climate change. Adaptation may require alterations to heritage assets or development within their settings. A holistic view should be taken when considering such alterations. This should balance the need to safeguard the future of the asset and its conservation, and where appropriate, enhancement, of its significance.
- 8.45 Historic England offers information and advice on many related topics including energy efficiency and historic buildings. **Historic England Advice Note 18** sets out more detail regarding their requirements for adapting historic buildings for energy and carbon efficiency.
- 8.46 New planning implementation guidance/ or similar will be developed to provide further guidance.

Policy CER4: Renewable and low carbon energy generation

Renewable and low carbon energy-generating development¹², including energy networks and community projects and all related enabling infrastructure (including battery storage and other energy storage facilities or recovery of waste heat or cooling and proposals that support the transition to a smart, flexible, and zero carbon energy system) will be supported where proposals avoid unacceptable impacts upon amenity and the natural, historic and built environment. Clear evidence of local community involvement and leadership will be given substantial positive weight.

Energy-generating development that is neither renewable nor low carbon will not be permitted¹³

Community and Corporate Plan – Creating a Sustainable Future

Explanation

- 8.47 The GWFOB aims to support the national decarbonisation plans for electricity and promote the uptake, locally, of renewable energy generation. In addition, the NPPF states the planning system should support the transition to net zero by 2050 and should increase the use and supply of renewable and low carbon energy and heat. The UK government's "Clean Power 2030" target aims for a clean power system by 2030, with at least 95% of our power coming from low-carbon sources. The use and supply of renewable and low carbon energy and heat will play a vital contribution towards local and national net zero carbon targets by 2050. By driving forward new low carbon technologies, we can cut the use of fossil fuels for heating our homes.
- 8.48 Previous studies¹⁴ carried out show a lack of abundant natural resources to supply clean energy in Torbay. The constrained nature of Torbay and proximity to nationally significant

¹² Includes a wide range of technologies that harness energy from water (hydro, wind, solar, clean hydrogen, geothermal, ground via bore holes, anaerobic digestion and new and emerging opportunities.

¹³ With the exception of essential services and buildings, such as hospitals, that will still need backup power generation which are likely to be powered by fossil fuels.

¹⁴ torbay.gov.uk/media/1797/sustainableenergyassessment.pdf

landscapes and marine designation, limits capacity for clean energy generation, through large, stand-alone, wind turbines, solar farms and low carbon heat networks. However, technologies are developing all the time and may give rise to new opportunities such as geothermal heat. Therefore, this policy aims to be flexible and support the clean power transition where appropriate for Torbay. The Local Plan also aims to maximise smaller scale clean energy generation like roof top mounted solar. This is covered in more detail in Policies CERS and CER1.

- 8.49 Major developments are encouraged to include land for larger scheme such as solar PV and wind turbines and be accompanied with some means of longer-term energy storage, to draw-down electricity when required.
- 8.50 Communities are also encouraged to develop their own low carbon/renewable energy proposals, through neighbourhood plans. The benefits of which can include community ownership, revenue, and local jobs.
- 8.51 Where renewable and low carbon energy-generating development comes forward, the council will not require applicants to demonstrate the overall need for renewable or low carbon energy. The approach set out in this policy aims to help increase the use and supply of renewable and low carbon energy and heat as it arises.
- 8.52 Energy networks are vital to making net zero a reality in the UK. In high density urban areas, they are often the lowest cost, low carbon heating options. This is because they offer a communal solution that can provide heat to a range of homes and businesses by capturing or generating heat locally. By driving forward new low carbon technologies like heat networks, we can cut the use of fossil fuels for heating our homes and shield households from oil and gas price rises that are being pushed up by pressures on global energy markets.

The Energy Act 2023 provides the powers for government to implement heat network zoning in England through regulations. These zones will be introduced from 2025. If a zone is highlighted in Torbay this policy will be updated to support the development of the zone.

Strategic Policy ER1: Flood Risk and Safe Development

NEW ER1 (subject to review by Environment Agency):

Proposals must demonstrate that all proposed development, including access and egress, is safe for its lifetime, taking into account all sources of flood risk (including ground water), future use, and the impacts of climate change. It must follow the sequential approach, prioritising sites with the lowest flood risk and ensuring land use vulnerability is appropriate to the location.

All proposals must be accompanied by a Flood Risk Assessment (FRA), proportionate to site size, location, and flood zone/critical drainage area. The FRA must demonstrate that:

1. Development is located appropriately, guided by the sequential test where applicable, favouring areas at lowest flood risk.
2. The development is safe for its entire lifetime, considering the latest Environment Agency climate change projections and future flood risk.
3. The development does not increase risk as a consequence of flooding, including risk to life through higher occupancy levels or reduced ability of occupiers to respond safely.
4. In higher-risk areas, where the development can be justified in principle, the development is designed and laid out to be resilient to flooding and to avoid harm to third parties.
5. Mitigation measures are incorporated, including:
 - a. Sustainable Drainage Systems (SuDS)
 - b. Water Sensitive Urban Design (WSUD)
 - c. On-site water storage.
 - d. Mitigation measures must control runoff, reduce downstream flooding, and improve water quality, having regard to the sensitivity of receiving waters, including the Marine Special Area of Conservation (SAC). In addition, they must include provision for safe exceedance flow routing, ensuring that rainfall events exceeding the design capacity of drainage systems are managed without increasing risk to people or property.

6. **Proposals must comply with local and national strategies and guidance, including the Local Flood Risk Management Strategy, SuDS Design Guidance and the Strategic Flood Risk Assessment (SFRA).**
7. **Where flood defences exist, development ensures long-term effectiveness and maintenance, potentially contributing financially toward upgrades.**
8. **Development does not restrict access to watercourses or flood defence assets for maintenance or improvement.**

Proposals that enhance floodplains, restore natural drainage, or open culverts are encouraged, particularly where they:

- i. **Reduce flood risk**
- ii. **Improve water quality**
- iii. **Enhance biodiversity**
- iv. **Provide amenity or recreational benefits**
- v. **Reduce flows to the combined sewer network or slow the movement of water through the catchment**

Development of basement accommodation, including changes of use, conversions or basement parking, will not be permitted in flood zones 2 or 3 or areas identified in the SFRA at high risk of flooding (including climate change allowances).

Development must demonstrate that it will not contribute to cumulative increases in sewer loading or flood-related discharges that could increase pollutant inputs to the Marine SAC.

Development which contributes to downstream flooding or increases discharge from combined sewer overflows (CSOs) during flood events will not be permitted unless appropriate mitigation is secured and the necessary flood protection measures referred to above are in place and operational. Developers will be required to contribute to these works as appropriate (see Policies INS,IN1 and ER2).

Development will be resisted where maintaining flood defence infrastructure required to retain the existing level of protection would result in disproportionate costs or generate substantial obligations for the public sector.

Explanation

- 8.53 This policy seeks to ensure that development is located, designed and managed to minimise flood risk and remain safe for its lifetime, taking account of climate change and all sources of flooding.
- 8.54 Given the constrained nature of Torbay's catchments and the designation of the area as a Critical Drainage Area, Flood Risk Assessments are required for all development. These must take account of the latest evidence, including the Strategic Flood Risk Assessment (SFRA) and the latest Environment Agency climate change allowances for fluvial, tidal and surface water flooding relevant to the site location and lifetime of development.
- 8.55 All development is required to apply the sequential approach to direct growth to areas at lowest risk, having regard to the vulnerability of the proposed use. Where development is necessary in higher-risk areas, robust mitigation and careful design will be required to ensure safety and to avoid increasing flood risk elsewhere.
- 8.56 Managing surface water is a key part of reducing flood risk. Development is expected to incorporate Sustainable Drainage Systems (SuDS), Water Sensitive Urban Design, and other measures that control runoff, reduce downstream impacts, and improve water quality. Further detail is set out in Policy ER2.
- 8.57 Flood risk in Torbay is closely linked to the performance of the combined sewer network. Increased surface water flows can lead to sewer surcharge and increased discharges from combined sewer overflows, with implications for water quality, including effects on bathing waters and the Marine Special Area of Conservation. Development must not increase these pressures and, where possible, contribute to their reduction.
- 8.58 Further detail on flood risk, drainage constraints, and infrastructure requirements is set out in the Flood Risk and Water Management Topic Paper.

Strategic Policy ER2: Drainage Hierarchy

NEW ER2 (subject to EA comments)

All development, including changes of use, must minimise the generation of surface water run-off and improve surface water management on the site. Proposals must

seek to reduce surface water discharge to the combined sewer network and will be supported where this is achieved.

Development must not discharge surface water in the combined sewer network. Where this is robustly demonstrated to be the only feasible option, appropriate mitigation must be secured to ensure no overall increase in the volume and rate of surface water discharge to the combined sewer network.

Prior to consideration of discharge options within the drainage hierarchy, drainage strategies should maximise opportunities for:

- i. The use of permeable surfaces, natural features and vegetation to maximise infiltration of surface water
- ii. Water reuse and rainwater harvesting for re-use on the site

All development must adhere to the drainage hierarchy in Table ER2-1, prioritising infiltration and discharge to watercourses wherever feasible. Only where it is evidenced that ground infiltration is not possible can the next method of water disposal in the hierarchy be investigated.

Table ER2-1. The drainage hierarchy, listed in order of priority:

Drainage Hierarchy:	
1.	An adequate ground infiltration system (for example swales, soakaways, infiltration basins, filter drains, rain gardens). This option must be fully explored and only discounted where the Local Planning Authority (LPA) is satisfied that it is not feasible
2.	A main river or water course
3.	A surface water sewer or highway drain
4.	As a last resort, where the above drainage solutions have been fully investigated and robust evidence provided to justify why they cannot be utilised, development may be permitted to discharge surface water to a combined (foul and surface water) sewer, where: a) discharge rates are restricted to greenfield rates, and; b) the requirements of Table ER2-2 and Policy NCS2 are met

Table ER2-2. Development requirements when disposing of surface water in the combined sewer.

Explanation

- 8.59 The **Torbay Sewer Capacity Assessment (SCA)** hydraulic modelling suggested that the sewer network will face substantial challenges due to the cumulative impacts of increased sea level rise and rainfall, urban creep and population growth.

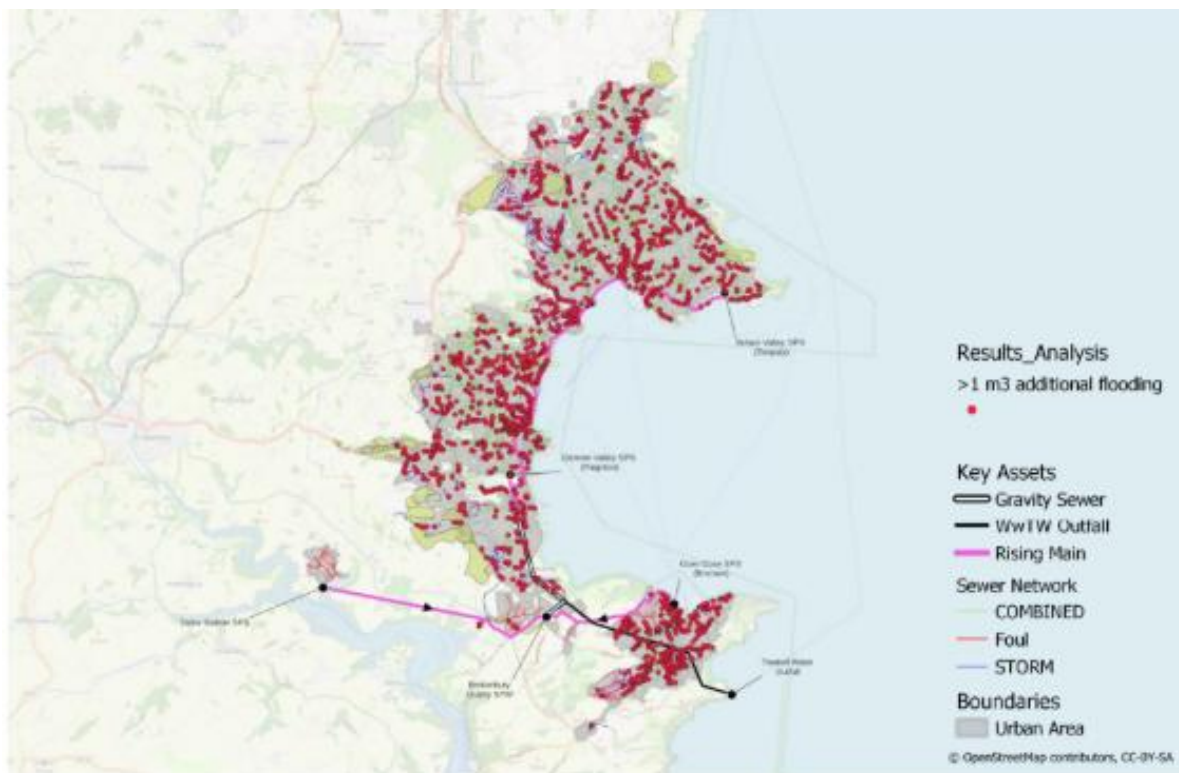


Figure 18 - Torbay flooding detriment due to development foul flows, creep across the whole catchment and 50% climate change allowance and 300 dwellings per year without mitigation.

- 8.60 Figure 19 illustrates flooding detriment due to development foul flows, urban creep across the whole catchment and 50% climate change allowance. This assumes a growth rate of 300 dwellings a year, but no mitigation works. For this assessment, the critical level has been taken as 0.5m below the manhole cover. This is the point where water level may impact upon low lying property by causing flooding or restricted sewer use. It should be noted that the results have been generated from a relatively extreme rainfall event and

must be viewed as an indicator of modelled performance, rather than of the likelihood of actual sewer flooding occurring.

- 8.61 The SCA predicts an 11% increase in combined sewer overflows (CSOs) by 2040 due to higher rainfall from climate change, population growth, and urban creep from the existing built areas. Increased CSOs would harm the features of the Lyme Bay and Torbay Marine SAC, reduce Torbay's bathing water quality, and negatively impact tourism—all highly sensitive to water quality changes.
- 8.62 To avoid impacts on the Marine SAC the risk of increased CSO spills and sewer flooding must be prevented. All development must reduce the amount of rainfall that is discharged into the combined sewer system through adherence to the drainage hierarchy.
- 8.63 In accordance with advice from SWW, proposals seeking to discharge surface water into combined sewers will be subject to increased scrutiny. Developers must clearly justify why higher-priority disposal methods in the hierarchy cannot be used, to avoid adding stress to the network.
- 8.64 Brownfield or town centre developments are not always able to meet steps i-iii of the drainage hierarchy and may seek to discharge surface water into the combined sewer system at a controlled rate. Natural England has expressed serious concerns about the effect of combined sewer overflows on the integrity of the marine reefs within the SAC. The cumulative impact of surface water and population increase is likely to result in increased CSOs, which has an adverse effect on the integrity of the Marine SAC.
- 8.65 Development must demonstrate no likely significant effect (LSE) on the Marine SAC, including cumulative impacts. In order to achieve this, proposals will need to show that they avoid or cancel out the risk of increased run-off, and thereby an increased risk of spills.
- 8.66 However, where proposals are reliant upon discharge to the combined sewer system, posing a risk of increased spills, it is likely that they will contribute to a LSE on the Marine SAC and will require Appropriate Assessment, including an assessment of 'in combination' effects. In these instances, mitigation measures will be required and the council may require a planning contribution towards strategic sustainable drainage improvements to reduce surface water within the combined sewer system when development disposes of surface water in this way.
- 8.67 Where adverse impacts on a SAC may occur, there is a need for assessment of mitigation measures under the Habitat Regulations to determine the acceptability of proposals. As a result, development will be required to submit drainage details prior to determination so that the council can assess whether it can reasonably be achieved with no adverse impact on the SAC due to the cumulative impact.

- 8.68 Minimisation of surface water run off can further be achieved using green infrastructure features which improve the potential for natural absorption of rainwater, such as soakaways, rainwater harvesting and reuse, green roofs, infiltration areas, porous pavements, attenuation wetlands and tree pits. All development should maximise these sustainable water management features.

Strategic Policy ER3: Water Management

NEW ER3 (Subject to EA approval)

Proposals must not have an unacceptable impact upon the water environment. As such all development must submit a water management plan (proportionate to the scale of development) demonstrating how the below criteria have been satisfied:

- i) The design of buildings and the surrounding environment (including pavements, highways, parking areas, driveways, gardens, public green spaces, planting and drainage) maximises Water Sensitive Urban Design (WSUD) and the provision of natural flood management measures and is resilient to the ongoing and predicted impacts of climate change. The design of development must maximise natural and permeable surfaces (impermeable surfaces will only be permitted as the exception where it is demonstrated natural/permeable are not possible).**
- ii) All development must treat water as a valuable resource by minimising water consumption and optimising water efficiency:**
 - a) New homes (including conversions) will be expected to demonstrate how they will achieve an estimated water consumption of 100 litres or less, per person per day.**
 - b) Non-residential development will be required to achieve full credits for category Wat 01 of BREEAM unless demonstrated to be impracticable.**
- iii) Development avoids harm to surface waters (including rivers and coastal waters), sensitive water-reliant habitats, species and sites protected under European legislation, and the quality and quantity of groundwater. Regard should be had to the cumulative effects of developments; (Refer to Policies ER2 and NCS2)**
- iv) Where development is located within Groundwater Source Protection Zones (SPZs) or where there is a risk of adverse effects on aquatic ecosystems from**

the development or its construction, Pollution Prevention Plans must be prepared and submitted as part of a planning application;

- v) Development provides appropriate connection to the public sewer and complies with the requirements of Policy ER2.**

Development delivers appropriate mitigation measures in accordance with the government's current Water Framework Directive objectives.

Community and Corporate Plan – Creating a Sustainable Future

Explanation

- 8.69 This Policy seeks to minimise the effect of development on water bodies, deliver Water Framework Directive objectives and implement mitigation measures set out in the South West River Basin Management Plan.
- 8.70 Under the Water Framework Directive, development must not cause deterioration in water quality status. The council will ensure compliance, and seek development to bring about improvements to bathing waters and marine habitats through its design and off-site contributions where appropriate.
- 8.71 Evidence from the Environment Agency and South West Water, alongside a joint position statement from these bodies, supports the need for water resilience measures in all development in Torbay. A water efficiency standard of 100 litres per person per day for new homes is justified and should be calculated using the methodology in Approved Document G of the Building Regulations.
- 8.72 The design of new developments should incorporate water efficiency and consumption measures, such as rainwater/ or greywater recycling, low flow taps and showers, low flush toilets, rain gardens and water butts in the construction of new buildings.
- 8.73 Where development poses a significant risk to the water environment, either through the construction process or operation, a Pollution Prevention Plan (PPP) will be required. The PPP must identify how adverse effects on aquatic ecosystems, such as the marine SAC) and socio-economic assets (e.g., bathing waters) will be managed. Physical or chemical modification of water bodies will be resisted where it harms their function or damages habitats.
- 8.74 Groundwater is an invaluable source of water for public supply, industry, agriculture and rivers but is vulnerable to a range of activities, such as pollution from industrial uses or infilling in the urban area. The council will refuse proposals that pose an unacceptable risk to groundwater and may require measures, such as Sustainable Drainage Systems

(SuDS), to minimise or remove the risk. The use of natural SuDS such as swales, soakaways, infiltration basins, filter drains and rain gardens will be the preferred approach.

- 8.75 The age and capacity of shared sewers, particularly in Paignton, are a major infrastructure constraint. Policy W5 addresses wastewater disposal in more detail. Better use of existing infrastructure and water efficiency will be as important as new sewerage infrastructure in ensuring a sustainable future. Development must provide adequate sewerage infrastructure to cope with increased sewage and surface water, including the impact of extreme weather events. Foul and surface water drainage should be separated to reduce the likelihood of flooding and contamination downstream. Water conservation and reuse measures, such as rainwater harvesting and natural sewage treatment (e.g., reed beds), are encouraged. Development phasing may be required to align with critical water and drainage infrastructure improvements and Grampian conditions used to ensure phased and timely infrastructure development to serve growth.

Policy ER4: Sustainable Drainage Systems and Water Sensitive Urban Design

Sustainable Drainage Systems (SuDS) must prioritise the use of above ground, biodiverse solutions and be incorporated into development proposals in a holistic and imaginative way so that they form an integral part of the green and blue infrastructure, providing multi-functional benefits to amenity, water quality, recreation and biodiversity.

SuDS should be designed to provide a safe, naturalised, accessible system minimising the need for fencing or barriers. Consideration must be given to the vulnerability of existing site surroundings, including buildings, ground conditions, ecology, landscape ,heritage and public health, in relation to the design and management of surface water features.

Well-designed SuDS should deliver multiple benefits, contributing to biodiversity net gain, climate adaptation and high quality public space. All Sustainable Drainage Systems must incorporate appropriate treatment stages to remove pollutants prior to discharge.

Development incorporating Sustainable Drainage Systems (SuDS) must have regard to the most recently adopted Torbay Council SuDS Design Guide and the National Standards for Sustainable Drainage Systems.

Where necessary, development may be required to contribute to improvements to existing drainage infrastructure.

All development should utilise a Water Sensitive Urban Design (WSUD) approach to ensure the delivery of water sensitive places, integrating the management of water within the design of buildings, public spaces and landscapes to reduce runoff, improve water quality and enhance amenity. Where urban areas are being regenerated the retrofitting of water sensitive urban design is a high priority.

Explanation

- 8.76 At the top of the drainage hierarchy is infiltration to Sustainable Drainage Systems (SuDS). SuDS mimic nature and are designed to take account of water quantity (flooding), water quality (pollution) and amenity issues. They are more sustainable than traditional drainage methods because they:
- Reduce flooding by managing runoff volumes and flow rates from hard surfaces
 - Protect or enhance water quality
 - Protect natural flow regimes in watercourses
 - Are sympathetic to the environment and the needs of the local community creating a better place to live and work
 - Provide a natural habitat for wildlife
 - Promote evapotranspiration from vegetation and surface water
 - Recharge groundwater and natural aquifers
- 8.77 Water Sensitive Urban Design (WSUD) integrates water cycle management with the built environment through the use of Sustainable drainage systems (SuDS) and by embedding water management within the design and layout of development, rather than treating it as a standalone drainage function.. In towns and cities, space for water can be created in areas that are not traditionally 'designed' to manage water. Blue corridors can be created in existing urban areas to channel and attenuate run off through a development whilst enhancing green infrastructure, biodiversity and public amenity

Policy ER5: Contaminated Land and Site Remediation

Development proposals must take the following environmental considerations into account:

- i) Where identified or suspected contamination presents a risk to public health and safety, buildings, structures or the natural environment, appropriate investigations and remedial or precautionary measures will need to be agreed with the council; and
- ii) Developers will need to demonstrate that any identified or suspected contamination can be satisfactorily overcome without risk to health.
- iii) The council will seek to support and subsidise the removal of contamination where it achieves wider public benefits including town centre regeneration, provision of employment or affordable housing.

Community and Corporate Plan – Pride in Place

Explanation

- 8.78 Prioritising brownfield sites will often mean that contaminated land needs to be reused. Whilst contamination is not generally a significant issue in Torbay, there are several important sites where previous or current land uses suggest a remediation strategy will need to be agreed with the council before development commences.
- 8.79 Whilst contamination needs to be removed and sites rendered safe, some such sites are often very sustainably located for brownfield regeneration, and the council will seek to support their regeneration, including through the flexible use of developer contributions, where this meets the legal tests.
- 8.80 The council has prepared a Contaminated Land Strategy in accordance with the Environmental Protection Act 1990 – Part IIA.
- 8.81 The council will request appropriate site investigations and reports to be undertaken to assess the ground conditions and to identify the remedial, preventative and precautionary measures that will be required. The examination of any development site may need to consider surrounding land and activities, including any pathways through which a pollutant could potentially transfer. The sensitivity of the proposed end use is especially relevant, particularly where residential development is proposed with gardens; sites with a history of contamination could present risks from growing vegetables or dermal contact with soils.

The degree of exposure, in terms of the time users of a development spend staying in an area, will be taken into account. Site investigation reports and recommendations for remedial, preventative or precautionary measures must be submitted with major planning applications.

Policy ER6: Ground stability and risk management

Development proposals must take the following considerations into account:

- i) **Appropriate investigations and remedial or precautionary measures will need to be agreed with the council where identified or suspected ground instability presents a risk to public health and safety, buildings, structures or the natural environment; and**
- ii) **Developers will need to demonstrate that any identified or suspected ground instability can be satisfactorily overcome in order for development to proceed. This applies particularly, but not just to, land within the Coastal Change Management Zone.**

Community and Corporate Plan – Creating a Sustainable Future

Explanation

- 8.82 Ground stability is an issue in the immediate coastal area and inland due to the natural movement of the ground and underlying strata or bedrock. The impacts of climate change can also result in ground stability issues. Where land stability has been identified as a concern or is suspected, developers will be expected to undertake a geotechnical investigation in accordance with the council's requirements. Conditions will be attached to planning permissions to ensure necessary procedures are followed. See also Policies ER7 'Coastal change management areas' and Policy GE1 'Geodiversity'.

Policy ER7: Coastal Change Management Areas

NEW ER7 (subject to review by the Environment Agency – will add to the tracked changes document once we have EA agreement)

New residential development (including through change of use) will not be permitted within a Coastal Change Management Area (CCMA).

To reduce the impacts of physical changes to the coast and the impact of these changes on coastal communities, new development or the intensification of existing development in Coastal Change Management Areas will be limited to the following:

- a. Essential infrastructure¹⁵ (including relocation) where there are clear, costed plans to manage the impacts of coastal change, and it will not have an adverse impact on rates of coastal change at the site or elsewhere;**
- b. Changes of use to a less vulnerable use requiring a coastal location and providing substantial economic and social benefits to the community;**
- c. Key community infrastructure, requiring a coastal location to provide the intended benefits, where there are clear, costed plans to manage the impact of coastal change and the service it provides;**
- d. Adaption measures to existing buildings, businesses and infrastructure, which increase resilience to flood risk and coastal change;**
- e. Temporary siting of development directly linked to the coastal strip (such as beach huts, cafes/tea rooms, car parks and sites used for holiday or short-let caravans and camping);**
- f. Water compatible development, where the CCMA risk is inundation;**
- g. Minor extensions to established dwellings where the structural integrity of the shoreline would not be undermined.**

All development must demonstrate:

- i. that it is consistent with policy statements for the local policy unit in the Shoreline Management Plan;**
- ii. that it will be safe over its planned lifetime, would not increase risk to life or property, and is designed, sited and securely fixed to minimise risks from coastal erosion, flooding and storm events, including ensuring that buildings and associated materials are not displaced or mobilised during extreme weather events;**

¹⁵ In the context of CCMA's, essential infrastructure is defined as: i. essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk; ii. essential utility infrastructure which must be located in a flood risk area or CCMA for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood; and iii. wind turbines.

- iii. That it will not have an unacceptable impact on coastal change;
- iv. that it conserves, or where appropriate enhances, landscape, seascape and townscape character, heritage significance and important coastal habitats, particularly where they are at risk from climate change impacts.

Where development is considered acceptable within a given timeframe in a CCMA, time-limited permission may be granted.

Where development is proposed outside a CCMA but within a Coastal Vulnerability Zone, or where there is uncertainty about the rate of erosion or extent of flooding that could cause loss or permanent inundation within the lifetime of a development, the precautionary principle should apply.

The replacement, relocation or adaptation of essential infrastructure within a CCMA will be supported, where necessary to maintain the safe and effective operation of critical services, subject to compliance with the Plan as a whole.

Community and Corporate Plan – Creating a Sustainable Future

Explanation

- 8.83 The National Planning Policy Framework (NPPF) requires plans to manage coastal change by avoiding inappropriate development in vulnerable areas and identifying Coastal Change Management Areas (CCMAs). These identify areas at risk from coastal erosion and, in some locations, inundation over the plan period. While much of Torbay's coastline is currently defended, this does not remove long-term risks, particularly where there is uncertainty in the rate and extent of coastal change.
- 8.84 Coastal change may affect land, property and key infrastructure. In Torbay, elements of essential infrastructure, including parts of the wastewater network such as rising mains, are located within CCMAs. Where there is uncertainty about erosion or flooding, risks to infrastructure and service continuity may increase. This may also add pressure to wider infrastructure constraints identified through the Water Cycle Study and Habitats Regulations Assessment.
- 8.85 Development within CCMAs should be resilient to coastal change over its lifetime. Proposals should consider site-specific risks, including erosion, inundation and storm events, and how these are addressed through design, siting and construction. This policy supports the replacement, relocation or adaptation of essential infrastructure where

needed to maintain critical services, reflecting the need to respond to coastal change over time and ensure communities remain safe and functional.

Chapter 9: Our Natural Places - Protecting and enhancing Torbay's countryside, landscape and natural environment



Figure 19 – Our Natural Places

Strategic Policy LS: Landscape Strategy

The overarching strategy is to provide a high-quality landscape setting and strong green infrastructure framework; to protect, conserve and, wherever possible, enhance landscape character and local distinctiveness for the countryside and seascape by reference to the Torbay Landscape Character Assessment, including the Historic Landscape Characterisation. The rural landscape performs a crucial part of the identity and value of our settlements and the strategic gaps between the three main towns in Torbay and between Torbay, Teignbridge and the South Hams should be protected to prevent coalescence and to retain the separate identities of the settlements.

The South Devon National Landscape (SDNL) has the highest status of protection and great weight will be given to conserving and enhancing the landscape and scenic beauty; development within the SDNL setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated area.

All new major development should be set sympathetically within the landscape, and promote a connection with green space and nature, providing appropriate green infrastructure including access to green space or water, such as ponds and streams; new streets should be tree-lined. Woodlands, trees and hedgerow features should be protected and provided appropriately to the scale of development and landscape context. Development should protect and enhance locally valued landscapes.

Urban open spaces and landscape/townscape features will be maintained or enhanced to support the overall character and appearance of the local environment.

Community and Corporate Plan – Pride in Place

Explanation

- 9.1 The local landscape setting as a crucial part of the identity and value of Torbay. Conserving the setting of our villages, towns, and protecting the South Devon National Landscape, is a central consideration in approving or refusing permission for new development.

Strategic Policy L1: Protecting our countryside and rural economy

In the open countryside, away from existing settlements, and in rural areas surrounding the three towns of Torbay, development will be resisted where this would lead to the loss of open countryside or creation of urban sprawl, or where it would encourage the merging of urban areas and surrounding settlements to the detriment of their special rural character and setting. The countryside area and undeveloped coast (Policy L3) together define the settlement boundaries.

Major new development should focus on Future Growth Areas in the Strategic Delivery Areas set out in the Key Diagram, consistent with the ambition and policies of the Local Plan. Otherwise, development outside the main urban areas and Strategic Delivery Areas will only be supported within the established boundaries of villages and hamlets, provided that it is of an appropriate modest scale and

consistent with relevant Local Plan Policies, including those relating to landscape, recreation, biodiversity, design and conservation. Suitable infill development, refurbishments and conversions will be supported within these settlements in order to meet the day-to-day needs of local communities, to promote the retention and development of local services and to help maintain their sustainability. Village Envelopes in Maidencombe and Churston/ Galmpton are defined on the Policies Map.

Outside settlement boundaries, the following forms of development may be permitted, provided that the rural and landscape character, wildlife habitats, green corridors and historic features are not adversely affected and necessary mitigation measures are carried out to minimise any harm to the environment:

- i) New homes for which there is a proven agricultural need, or self-build affordable housing where acceptable under Policy H8.
- ii) Development required for forestry, horticulture or agriculture;
- iii) Touring caravans and tents;
- iv) Tourist facilities appropriate to the rural area;
- v) Development associated with outdoor sport and recreation appropriate in a rural area;
- vi) Sensitive conversion, alteration and extension of existing buildings;
- vii) Essential improvements to the highway network; and
- viii) Appropriate renewable energy development.

Where new development proposals come forward, the council will also have regard to the need to protect, conserve or enhance the distinctive landscape characteristics and visual quality of a particular location, as identified in the Torbay Landscape Study and Character Assessment, the suitability of development and the capacity of the countryside to accommodate change.

Proposals must demonstrate how they have taken into account the most recent Landscape Character Assessment and assessed the potential impact of the proposal on the landscape including cumulative impact. Where a proposed development is likely to have a significant impact on the landscape character or visual amenity of an area, a Landscape Visual Impact Assessments (LVIAs) or Environmental Impact Assessment will be required. Policy L4 refers to locally valued landscapes.

Development in the countryside must not have an adverse effect on the integrity of the South Hams SAC or other important habitats. It should also have regard to Policy NC1 to assess the in-combination effects of multiple developments that could affect Greater Horseshoe Bats, calcareous grassland features and the integrity of the South

Hams SAC, and the scope for developer contributions to mitigate the impact of increased recreational pressure on the South Hams SAC.

The Countryside Area is shown on the Policies Map.

Community and Corporate Plan – Community and Place

Explanation

- 9.2 The open countryside of Torbay is a fundamental part of the sub-region's identity and a major component of the Bay's tourism offer. It provides amenity value and a range of recreational opportunities and is an integral part of the Bay's economy.
- 9.3 The Local Plan strikes a careful balance between protecting the integrity and character of the countryside whilst allowing development that is vital to the support of sustainable communities, such as rural exceptions affordable housing, and self-build schemes (see Policies H8 and H9) and the rural economy.
- 9.4 The Countryside Area is shown on the Policies Map and has been defined for the following reasons:-
1. To identify the countryside around Torbay as a finite resource and to encourage its best use;
 2. To safeguard Torbay from further urban sprawl and maintain important green wedges;
 3. To prevent the main urban areas of Torbay from merging with each other and neighbouring settlements;
 4. To preserve the special character of the towns and villages within Torbay's overall landscape setting;
 5. To recognise the need to adapt to changing demands in the countryside around Torbay and priorities for development;
 6. To concentrate building development within the urban area and prevent the unnecessary spread of inappropriate uses into the countryside; and
 7. To maintain a connected network of landscape features to provide Green Infrastructure
- 9.5 Much of the rural hinterland will be covered by other designations including country parks other landscape designations as well as our best and most versatile agricultural land (Policy SC4). Proposals for development will be considered in the context of the Torbay Landscape Character Assessment which identifies the key characteristics to protect, conserve or enhance those features which contribute to a particular distinctive character.

- 9.6 Different towns and urban areas in Torbay have very distinct identities that should be protected and wherever possible enhanced. Strategic green wedges are important to prevent urban coalescence and retain the valuable landscape setting that is characteristic of Torbay's urban areas. About a quarter of the Countryside Area is also overlaid by the nationally important National Landscape (AONB) (Policy L2), and 40% is designated as undeveloped coast (Policy L3) and form part of the Strategic Local Nature Recovery Network (LNRN).
- 9.7 The Local Plan Update provides an opportunity to identify areas of non-coalescence, on the Policies Map, which would seek to retain a rural and open character of the land, and/or protect the separate identity of settlements (both existing and allocated).

Policy L2: National Landscape (previous Area of Outstanding Natural Beauty)¹⁶

Great weight will be given to conserving and enhancing the natural beauty of the South Devon National Landscape (previous Area of Outstanding Natural Beauty).

Major development in a designated National Landscape will be refused except in exceptional circumstances and where it can be demonstrated that it is in the public interest. Proposals within the setting of a National Landscape must not harm the setting and should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Consideration of such applications will assess:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated taking account of the relevant South Devon National

¹⁶ National Landscapes: areas legally designated as areas of outstanding natural beauty under the National Parks and Access to the Countryside Act 1949 and Countryside and Rights of Way Act 2000

Landscape (AONB) Management Plan and the special qualities alongside the Torbay Landscape Character Assessment.

Development which is permitted in the National Landscape should conserve and enhance its landscape and natural beauty, having particular regard to the impacts on its character components, as set out in the South Devon AONB Management Plan, including wildlife, cultural heritage, tranquillity, dark skies, views and avoids cumulative impacts; it should complement the scale, massing, footprint and spacing characteristic of the area. It should also adhere to guidance in the South Devon National Landscape (AONB) Management Plan, particularly in relation to the need for development to be landscape led building form and design. Mitigation measures may include planning contributions towards delivery of projects set out in the Management Plan.

Community and Corporate Plan – Pride in Place

Explanation

- 9.8 National Landscapes (formerly known as Area of Outstanding Natural Beauty- AONBs) are designated in recognition of the outstanding qualities of their ‘natural beauty’ under the National Parks and Access to the Countryside Act 1949. They contain the most beautiful, spectacular, and dramatic areas of countryside and form landscapes of national importance with designation conferring the highest status for the conservation of landscape and scenic beauty.
- 9.9 The Levelling Up and Regeneration Act (2023) amended Section 85 of the Countryside and Rights of Way Act 2000^[1], which means that rather than ‘have regard to’, relevant authorities (including the Local Planning Authority) must ‘further the purposes’ of Protected Landscapes of conserving and enhancing the natural beauty^[2] of the National Landscape (NL). Each component of natural beauty identifies what is special about the landscape and should be afforded ‘great weight’ in planning decisions. Reference to the South Devon National Landscape (SDNL) Management Plan is a key tool to ensure that public bodies are meeting their duty and reference to the special qualities which define the unique ‘natural beauty’ for which the SDNL is designated. The SDNL Management Plan’s policies and the special qualities (summarised below) of the SDNL establish criteria against which policy and actions can be assessed for compliance with the duty:
1. Fine, undeveloped, wild and rugged coastline

biodiversity, geological, recreational and cultural value. Development will not be supported in the undeveloped coastal area unless proposals satisfy the following requirements:

- i) Maintain the unspoilt character of the coastline, coastal landscape and seascape;
- ii) Maintain or improve public access for recreation; and
- iii) Provide sensitively designed development, including tourism uses, where there are clear economic or sustainability benefits that cannot be realised in alternative locations.

Where new development proposals have met the above criteria, the council will also have regard to the need to protect, conserve and enhance the distinctive landscape characteristics and visual quality of a particular location, as identified in the Torbay Landscape Study and Character Assessment, the suitability of development and the capacity of the countryside to accommodate change and particular reference to coastal change management.

Development outside the undeveloped coast which may harm the intrinsic character of the area will be assessed with regard to visual impact.

The Developed Coast

The developed coast: In the developed areas of coast, development will be permitted where it provides benefit to Torbay's economy and does not unacceptably harm the landscape character and appearance of natural, historic or geological assets and coastal change management.

Community and Corporate Plan – Pride in Place

Explanation

- 9.11 Policy L3 deals with landscape and related matters to do with the coast. Policy ER7 deals with issues such as shoreline management, flooding and land stability which are associated with development in coastal areas.
- 9.12 The mean low water mark defines the limits within which Torbay Council has a statutory power to control the development and use of land. The coast is significant from an environmental, economic and social perspective and adds greatly to the quality of life for Torbay's residents. The scenic beauty, natural setting and seascape underpin Torbay's popularity as a place to live, work and visit and so it is important to protect the intrinsic

landscape character of the undeveloped coast for its own sake, and as a significant, finite resource. The quality of life and distinctive local identity is enhanced by a large number of accessible award-winning bathing beaches and three harbours, which form an important recreational and amenity resource. The South West Coast Path extends along Torbay's coastline, providing an attractive environment for walking and wheeling which is a popular tourist draw.

- 9.13 It is important that the qualities of the coastline are conserved for future generations, in particular the important areas of undeveloped coastline which extend landward to include areas that maintain a coastal character, and are within the visual envelope to and from the seaward side. Developments will only be permitted along the undeveloped coast to provide facilities for activities appropriate to the location, such as low-key rural tourism or recreation uses, where their introduction does not harm the scenic qualities and prevailing character, and any built development is kept to a minimum.
- 9.14 Consideration should be given to whether there are alternative locations where the development could feasibly be located, away from the undeveloped coast. The Torbay Landscape Character Assessment (LCA) identifies a number of coastal landscape character types which incorporate the majority of the land within the undeveloped coast. The LCA should be used (in combination with any seascape analysis) as a basis for assessing the character and sensitivity of the area and its ability to accommodate new development. This will include parts of the developed coast where the LCA has identified 'undeveloped' maritime cliffs, coastal plateau and low lying beaches.

Policy L4: Valued landscapes

Landscapes which, by reason of their local distinctiveness, special qualities and features and or condition, that have a limited capacity to absorb change that will be considered to be valued landscapes. .

This will include the South Devon National Landscape and it's setting at a national level, alongside the undeveloped coast may be considered to form locally valued landscapes (LVL);

Proposals within these areas must:

- **Avoid loss of key characteristics, or their legibility, that underpin the scenic quality and the significance of the locally valued landscape and landscape character area.**

- Respond effectively to the key characteristics and significance of the area referred to in the Torbay Landscape Character Assessment and Landscape Sensitivity Assessments (2025) and the specific recommendations within the LCA (or subsequent update).

Locally valued landscape is not limited to the local designations the undeveloped coast and may be identified through the Torbay Landscape Character Assessment. Individual proposals within or next to these valued landscape areas should respond to the distinctive qualities and local character and will be assessed based on their specific landscape and visual impact taking into account any mitigation proposals.

Development which protects and enhances the locally valued landscapes will be supported.

Community and Corporate Plan – Pride in Place

Explanation

- 9.15 There is no single definition of a valued landscape, however, legal decisions have tended to say that to be a 'valued landscape', there should be some local distinctiveness, special quality, or feature, rather than solely being 'valued' by local people. It will be a matter of planning judgement whether or not land forms part of a valued landscape, the council considers that the following are likely to qualify as valued landscapes which include but are not limited to: the South Devon National Landscape and its setting, undeveloped coast, land within or in the setting of a designated heritage asset, urban landscapes such as Local Green Spaces (LGS) and Urban Landscape Protection Areas (ULPAs).
- 9.16 The LCA provides additional advice on whether areas of landscape are likely to be considered as 'valued'.

Policy L5: Urban Landscape Protection Areas (ULPAs)

Development within Urban Landscape Protection Areas (ULPAs), as shown on the Policies Map, will only be supported where:

- It does not undermine the value of the ULPA as an open or landscaped feature within the urban area; and

- ii) It makes a positive contribution to the urban environment or enhances the landscape character of the ULPA.

Development that would undermine the ULPA designation as a whole will be resisted.

Designated Urban Landscape Protection Areas are as follows : (request to assess potential new ULPAs in Torquay)

Table 14 Urban Landscape Protection Areas 13

Torquay
01 Watcombe Park and Watcombe Heights
02 Mincent Hill, Barton
03 Scotts Bridge/Barton
04 Riviera Way Corridor
05 Lummaton Hill, Combe Pafford
06 Hele Woods/Windmill Hill Woods
07 Daison Woods
08 St. Marychurch Road (formerly Oddicombe Downs)
09 Babbacombe Downs
10 Cary Park
11 Markham Plantation and Sherwell Valley
12 Shiphay Manor (Girls' Grammar School)
13 Rowcroft/Shiphay Plantation
14 Chapel Hill, Torre
15 Stantaway Hill, Upton
16 Grange Road/Warberry Copse
17 The Quinta
18 Lydwell Road
19 Palace Hotel Grounds (North)
20 Palace Hotel Grounds (South)
21 Ansteys Playing Field

22 Ilsham Valley/Lincombe Slopes
23 Torwood Gardens
24 Daddyhole Plain
25 St. Johns Wood, Park Hill
26 Stentiford Hill
27 Torre Abbey Meadows and Sports Grounds
28 Sherwell Park
29 Ashfield Gardens
30 St. Matthew's Field
Paignton
31 Preston Green
32 Parkfield
33 Paignton Green North
34 Paignton Green South
35 Queen's Park
36 Victoria Park
37 Paignton Cemetery and allotments
38 Monastery, Winner Hill
39 Primley Woods and Meadow to south
40 Goodrington Park/Roundham
41 Quay West Corner
42 Clennon Hill/Roselands Valley
43 Sugar Loaf Hill
Brixham
44 Tor Rocks, Broadsands
45 Brunel Woods, Galmpton
46 Battery Grounds

47 Furzeham Recreation Ground
48 St. Mary's Churchyard and Park
49 Summercombe
50 Shoalstone and Ashole Woods.

Community and Corporate Plan – Community and Place

Explanation

- 9.17 These enclaves of special landscape quality set in or bordering the urban areas (some of which also skirt the coastal fringe) vary in size and make a considerable contribution to the environment in a variety of ways. Taken as a whole these protected urban landscape areas form a valuable part of Torbay's green infrastructure (see Policy GIS) and help ensure a healthy Bay (see Policy SC1). They are considered to form 'valued landscapes'.
- 9.18 Some ULPAs act as local vantage points, some as amenity open space, some as green spaces that provide a natural and visual break within the local (urban) townscape and others as landmarks in the local scene. In some cases they perform all four roles. Designated ULPAs include both publicly owned/publicly accessible and privately owned/non-accessible sites. Some ULPAs are also of ecological significance and some have been subsequently allocated as Local Green Spaces (LGSs) in Neighbourhood Plans.
- 9.19 The preparation of an updated Local Plan offers the opportunity to review the designated ULPAs and provide further clarity and guidance in relation to these sites.

Policy L6: Local Green Spaces (LGSs)

Development proposals that protect or enhance Local Green Spaces and that comply with other relevant policies will be permitted.

Development proposals that would have an unacceptable adverse impact on the use, function and appearance of these local green spaces or would result in their loss will not be permitted other than in very special circumstances and such circumstances will only exist where the harm resulting from the proposal is clearly outweighed by other considerations.

Very special circumstances may exist for development enabling community or sports use on LGSs used as playing fields, or café/ food and drink uses in Harbourside and Waterfront locations. In such instances to open nature of the wider LGS and public access should be retained.

Very special circumstances also cover the proposed railway station at Edginswell, Development or change of use that would conflict with the reason for designation will be seen as inappropriate development.

Inappropriate development adjacent to a Local Green Space that would have a significant adverse impact upon the reason for the designation will not be supported.

Community and Corporate Plan – Community and Place

Explanation

- 9.20 The Neighbourhood Forums have included a number of Local Green Spaces that are green spaces that are demonstrably special to a local community. The preparation of an updated Local Plan offers the opportunity to review the designated Local Green Spaces. Designation should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services and be capable of enduring beyond the end of the plan period. Local Green Space must be reasonably close to the community it serves; have demonstrable local significance and interest; be local in character; and not cover an extensive tract of land. Local Green Spaces are designated in the made (adopted 2019) [Torquay Neighbourhood Plan](#) (99 LGS see Policy TE2 - Local Green Spaces), [Paignton Neighbourhood Plan](#) (53 LGS - Policy PNP1 and PNP1(a)PGLS) and the [Brixham Peninsula Neighbourhood Plan](#) (17 LGS - Policy E4: Local Green Spaces).
- 9.21 Consideration of development proposals within a Local Green Space should be consistent with national policy for Green Belts (excluding provisions relating to 'grey belt' and previously developed land).

Strategic Policy THS: Trees and hedgerows

Development that supports the planting of new trees or areas of woodland, especially in appropriate Devon Local Nature Recovery Areas, or which would include public access woodland schemes, will be encouraged where they conserve or enhance biodiversity, landscape, seascape character and best and most versatile agricultural land, or where they conserve and where appropriate enhance the significance of heritage assets and their settings, including historic landscapes. All development proposals will retain good quality and healthy woodland, trees and hedgerows. These features will be incorporated into the overall design and landscape scheme and located within public spaces where possible (see Policy TH1). New streets should be tree lined unless there are compelling reasons why this would be inappropriate. Where loss is unavoidable, Policy TH2 would apply. The council will seek to adopt new public green spaces and may protect any new trees through the implementation of Tree Preservation Orders (TPO).

Development proposals resulting in the loss or deterioration of ancient woodland, ancient hedgerows or ancient and veteran trees will only be permitted where there are wholly exceptional circumstances and the benefits of the development in that location clearly outweigh the loss. Where it is permitted, a compensation strategy will need to be agreed and secured prior to granting planning permission.

Where the proposal will result in the loss or deterioration of a tree protected by a Tree Preservation Order or a tree within a Conservation Area, then permission will be refused unless:

- ## Trees elsewhere:

Any other tree, hedge or woodland not covered by the above and which makes a positive contribution to the landscape, amenity, heritage or biodiversity value of the area, should be retained as part of the design and layout of development schemes.

Where a loss of trees, hedges or woodland is unavoidable or justified through an arboricultural assessment, replacement planting commensurate with the loss will be undertaken on site. Tree planting will be in accordance with Policy TH2. Where onsite replacement tree planting is not feasible, developer contributions will be required.

In instances where new trees and/or woodlands are proposed as part of wider development proposals, developer contributions may be required to ensure suitable management provision is made for their long-term management. This includes information provision of for residents and users about the appropriate positive management of private trees and landscape features.

Community and Corporate Plan – Protecting and enhancing our natural environment

Explanation

- 9.22 This policy aims to deliver strategic scale expansion of green landscape features and to ensure tree, woodland and other landscape features are protected, and where this is not possible suitable mitigation is provided.
- 9.23 Woodlands, trees and hedgerows can form important landscape features as well as providing valuable habitats and wildlife corridors.
- 9.24 Woodlands form traditional elements of the countryside or important islands of natural habitat within Torbay's urban areas. Once lost, this part of our heritage cannot be replaced.
- 9.25 Hedgerows, many of which are of traditional Devon Bank construction, are important elements within the landscape of Torbay. They can function as wildlife corridors linking wildlife sites. Hedges can also form very ancient land boundaries and may preserve historically important artifacts. A quarter of Devon's hedges are more than 800 years old. For these reasons, it is important that significant hedgerows are retained and their appropriate retention will be secured by planning conditions.
- 9.26 Established hedges have substantially more historic and environmental value than new hedges, which take time to mature and do not reflect historic enclosure patterns. Therefore, existing hedges should be retained wherever possible. This is particularly important where they form part of Greater Horseshoe Bat commuting routes identified in

integral part of layouts in the first instance and must comprise native hedging species wherever possible.

New development will be designed and undertaken to prevent damage to root systems of retained or new woodland, trees and hedgerows and will allow for future above and below ground growth over the life of the development. New trees must maximise their potential to provide climate resilience, including surface water attenuation, through measures such as tree pits which are fully integrated to SuDS schemes.

Measures to protect retained trees, hedges and woodland must be in place before, and remain in place during, the development process. This must be demonstrated through an agreed Method Statement. Appropriate management will be secured in perpetuity, through agreed Landscape Management Plans. For major residential developments, this should include the provision of information for new occupants about the benefits of and appropriate positive management of private trees, hedges and landscape features.

Where building near trees or hedges is unavoidable, construction techniques and methods of working will be designed to prevent or minimise damage. Temporary netting of hedges or trees prior to, and during construction of, development will not be permitted. Where hedges cannot be retained, they should be translocated, rather than removed.

Community and Corporate Plan – Protecting and enhancing our natural environment

Explanation

- 9.27 Trees provide significant environmental benefits and are especially valuable in urban areas. Beyond their intrinsic beauty, they help soften the impact of development, enhance the quality of our streets, and create a green framework for towns. Trees can be important both individually and in groups, and in some parts of Torbay, they are a defining feature of the local character.
- 9.28 Orchards form an important part of green infrastructure and local heritage, as well as supporting sustainable food production. Traditional orchards are a priority habitat, and the

Council has a statutory duty to conserve and enhance such habitats. Proposals affecting orchards will be assessed against Policies GIS, THS, and SC4.

- 9.29 Trees can be perceived negatively when located close to properties, where they can obstruct views, reduce light, or create maintenance and safety concerns. Development will not be supported if it is incompatible with the retention of trees. Proposals affecting trees will be carefully considered to ensure trees which are to remain do not cause unreasonable inconvenience to future occupiers.
- 9.30 Construction can easily damage tree roots through compaction or excavation. When determining planning applications, it is essential to ensure that construction activities do not occur in close proximity to trees in ways that could cause harm.
- 9.31 Trees will be safeguarded through planning conditions attached to development consents. These conditions may specify measures to protect trees during and after construction. Such conditions will be applied wherever trees of amenity value are adjacent to development. New planting should aim to enhance existing habitats, create new ones, or provide shelter belts.
- 9.32 Tree Preservation Orders (TPOs) may be used to protect trees of amenity value and prevent their removal. TPOs can apply to individual trees, groups, or entire areas. Torbay benefits from a rich legacy of trees, many of which are already protected by TPOs. Similar protections apply to trees within conservation areas, where there is generally a presumption against felling unless there are sound reasons for doing so.

Policy TH2: Mitigation for loss of trees, hedgerows and woodland

Where the principles of Strategic Policy THS have been followed, and it is evidenced that the loss of trees, hedgerows or woodland is acceptable, appropriate mitigation will be required.

Tree loss should be mitigated through compensatory planting in accordance with the Council's tree replacement table below.

Hedgerow loss should normally be replaced on at least a metre-for-metre basis, with a preference for achieving a net gain in connectivity and ecological value.

Where relevant, mitigation for the loss of trees and hedgerows may contribute towards Statutory Biodiversity Net Gain (BNG) (Policy NC3). Where BNG does not apply, tree and hedge mitigation should be secured separately.

In exceptional circumstances (e.g. where on-site mitigation would compromise good design), off-site provision or financial contributions may be accepted.

Deliberate prior removal of trees will be a material consideration.

Such tree planting should:

- a. take all opportunities to meet the five Tree Planting Principles (see supporting text); and
- b. unless demonstrably impractical or inappropriate, provide the following specific quantity of compensatory trees for the loss each tree within the size category indicated in Table TH2-1 below.

Table TH2-1 Tree Loss Compensation

Trunk girth (mm) at 1.5m above ground of tree lost to development	Number of replacement trees required per tree lost*
75 - 200	2
201 - 400	4
401 - 600	6
601 - 800	9
801 - 1000	10
1000+	11+**

* Replacement based on selected standards 100-120 mm girth at 1.0m

**Depending on the value of the tree to be lost additional compensatory planting may be required

An equivalent approach based on the latest Natural England's Green Infrastructure Framework Standards may be considered as mitigation where appropriate.

Where new compensatory hedges are provided, the principles of the Devon Hedge Group guidance on making new hedges should be followed unless an alternative approach is justified by site-specific circumstances.

In instances where new trees, hedges and/or woodlands are proposed, developer contributions may be required to ensure suitable provisions are in place for their long-term management and maintenance.

Community and Corporate Plan – Protecting and enhancing our natural environment

Explanation

- 9.33 Trees and other planting deliver a wide range of benefits, including wildlife habitat, urban cooling to help address climate change, adding maturity to new developments, softening and enhancing built form, providing screening and shade, reducing stormwater run-off, improving visual amenity, and supporting health and well-being.
- 9.34 New trees and planting can contribute to the government's 25 Year Environment Plan, the UK's efforts to hit net zero carbon emissions by 2050, biodiversity net gain and the Devon Tree and Woodland Strategy goal of achieving 20% tree cover in Torbay.
- 9.35 The tree compensation standard in this policy provides an indicative mechanism to determine the appropriate level of mitigation for loss of trees. Mitigation will be determined on a case-by-case basis in consultation with the Council's tree officer. The council's preference is for on-site replacement in suitable locations, secured through planning conditions however, for small scale householder development, off-site mitigation may be more appropriate.
- 9.36 Where off-site planting is justified, this should be preferentially be provided on public land or locations identified through the Devon Local Nature Recovery Strategy and will be secured via planning obligations.
- 9.37 The council is committed to increasing the overall tree cover wherever possible. Opportunities for new tree planting should be explored in all development proposals. Planting schemes for public spaces and highways should include only native species that occur naturally in the locality, unless arboricultural or other considerations mean native species are not appropriate.
- 9.38 Where new tree planting is proposed (whether to compensate for losses on- site or as enhancement), the quantity, location and species selection of new trees will be expected to take practicable opportunities to meet the following five Tree Planting Principles:
- Create habitat and, if possible, connect the development site to the Strategic Green Infrastructure Network; and

- Assist in reducing or mitigating run-off and flood risk on the development site; and
- Assist in providing shade and shelter to address urban cooling, and in turn assist in mitigating against the effects of climate change; and
- Create a strong landscaping framework to either (a) enclose or mitigate the visual impact of a development or (b) create new and enhanced landscape, or both; and
- Be of an appropriate species for the site.

Strategic Policy NCS1: Biodiversity and Nature Recovery Network

All development for the purposes of conservation and enhancement of the natural assets within the Bay will be supported.

The council will safeguard, conserve and enhance the valued qualities, features and attributes of sites in the Bay which are important for biodiversity and geodiversity.

In order to increase biodiversity, help achieve net zero, improve the local environment and enhance health and wellbeing, all development will be required to:

- i) Recognise the importance of and benefits provided by ecosystem services, and be located and designed to avoid negative impacts on biodiversity and geodiversity. This includes but is not limited to: tranquillity, dark night skies, bathing waters, biodiversity, geodiversity and soils within the Bay (commensurate with their importance). Only where this is not possible will mitigation, and as a last resort, compensation be considered.**
- ii) Protect, enhance and expand existing wildlife-rich habitats and geodiversity, and create new ones to support a nature recovery network. Development must seek to support and deliver the priorities and actions in the most up to date Torbay Green Infrastructure Strategy, Nature Recovery Network (NRN) and Devon, Plymouth and Torbay Local Nature Recovery Strategy (LNRS). These strategies must be utilised to ensure new development integrates wildlife and links new green spaces with habitats in the wider landscape.**
- iii) Protect local, national and internationally protected sites, priority species and habitats. The council will safeguard, conserve and enhance the valued qualities and features of sites protected under European legislation, including supporting habitats outside of the designation which ensures the favourable conservation status of the site. Where a proposal may have adverse effects on**

a European site which cannot be mitigated development will not be permitted. Particular attention must be paid to Greater Horseshoe Bat flight paths, and Cirl Buntings.

- iv) Avoid impacts on irreplaceable habitats. Development that involves the loss of irreplaceable habitats will not be supported.
- v) Positively incorporate and promote biodiversity features, proportionate to their scale, including features which support priority or threatened species such as swifts, bats and hedgehogs.
- vi) Provide a measurable and proportionate net gain in biodiversity, as set out in Policy NC2.
- vii) Provide long term land management practices to maintain or restore landscapes, greenspace, watercourses, dark corridors and amenity open spaces, integrating biodiversity and green infrastructure objectives including improved public access.
- viii) Have regard to the Devon, Plymouth and Torbay Local Nature Recovery Strategy and, where proportionate, seek to support the delivery of its priorities, including by contributing to habitat restoration, enhancement and creation within identified High Opportunity Areas.

All development must be located and designed to follow the mitigation hierarchy (avoid, minimise, mitigate, compensate) to prevent adverse impacts upon biodiversity, or geodiversity. Developer contributions may be required to allow monitoring of any mitigation, or to improve management or enhancement of the natural environment.

Community and Corporate Plan – Protecting and enhancing our natural environment

Explanation

- 9.39 Biodiversity is fundamental to our health, wellbeing, and economic prosperity. ‘Biodiversity’ means the variety of wild plants, animals, and their habitats, and also includes geological and geomorphological features. A healthy, resilient natural environment is a key asset for Torbay, contributing to its sense of place, tourism appeal, economy, and overall environmental quality. Biodiversity is also an essential consideration in achieving high-quality design.

- 9.40 The importance of biodiversity is increasingly recognised by government, reflected in the Environment Act 2021 and the **25 Year Environment Plan**. Torbay contains internationally, nationally, and locally designated nature conservation sites, shown on the Policies Map, which support a wide range of species. In 2024, the Torbay Climate Partnership approved the **Greener Way for Our Bay Framework and Action Plan** (GWFOB), which sets out a pathway for Torbay to achieve net zero carbon by 2050. The framework identifies ten key priorities, including “enjoying and protecting our marine and natural environment.” The nature conservation policies within this Local Plan align with the objectives of the GWFOB and will play an important role in supporting its delivery, particularly through the protection and enhancement of biodiversity and designated sites.
- 9.41 . The Devon Local Nature Recovery Strategy (LNRS) forms part of the evidence base for this Plan. Development proposals should have regard to the Devon, Plymouth and Torbay Local Nature Recovery Strategy and any local biodiversity evidence relating to target habitats and species. The Council will have regard to the LNRS priorities and mapped High Opportunity Areas when planning for biodiversity conservation, enhancement and recovery.
- 9.42 Landscape, biodiversity, and green infrastructure mitigation packages will be informed by these strategies and evidence. The Council will require no overall detriment and will seek net gains for the natural environment in line with the NPPF. Policy. Mitigation cannot compensate for intrinsically unsuitable development (see Policy NC1). High-quality bathing waters are also a key ecological and tourism asset; Policies ER2, ER3, and W5 aim to minimise wastewater impacts, including restricting new surface water connections to combined sewers.
- 9.43 Landscape can also be man-made and there is an interrelationship between the historic and natural environment for example when considering hedgerows, field patterns and other naturalised features (see Policies GIS and HES).

Strategic Policy NCS2: Habitats Regulations Assessment

Development must not adversely affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017 as amended¹⁷, other than in exceptional circumstances.

Sufficient and up-to-date survey information, commensurate with the sensitivity of the site and the nature, location, and scale of the proposal, will be required to inform planning applications and allow the planning authority to carry out Habitats Regulations Assessment (HRA) of the proposal.

Where there are likely significant effects to a European site, alone or in-combination, from an application, mitigation measures will need to be secured. Habitats Regulations appropriate assessment will be necessary and will need to ensure mitigation measures are adequate and secured for as long as the impact might occur. Legislation and government guidance requires the planning authority to be confident beyond reasonable scientific doubt that the proposals will not result in an adverse effect on the integrity of the site. Consequently, the council will require high quality and accurate evidence to inform HRA and will seek the advice of the statutory conservation body (Natural England).

Where it is not possible to rule out adverse effects on integrity, alone or in combination with other plans or projects, permission will only be granted in exceptional circumstances. In such cases it will be necessary to demonstrate that there are no alternatives, there is over-riding public interest and compensation can be secured.

Plans and proposals should take into consideration and be in accordance with the latest versions of all council and wider HRA guidance documents and strategies. These documents and strategies are intended to facilitate HRA assessment by providing a coherent strategic approach to the delivery of mitigation requirements whilst avoiding unnecessary duplication of assessment effort. Specific HRA policy requirements in relation to avoiding, mitigating and compensating impacts on European sites (at the point of Local Plan publication) are set out in the Policy Table below.

¹⁷ The Conservation of Habitats Species Regulations 2017, <https://www.legislation.gov.uk/uksi/2017/1012/contents> [accessed 20th Aug 2025]

Table 14 Habitats Regulations Appropriate Assessment (HRA) Requirements

Habitats Regulations Appropriate Assessment (HRA) Requirements	
Protected Site	HRA Requirements
Berry Head to Sharkham Point component of the South Hams SAC	In respect of the Berry Head to Sharkham Point component of the South Hams SAC, a strategic approach to HRA mitigation has been established and a new strategy is due to be completed in early 2026. The strategy will set out the mitigation measures required to ensure new residential and tourist accommodation does not have an adverse impact on Berry Head to Sharkham Point as a result of increased recreation pressures. Mitigation for the development of new residential or holiday accommodation within the Zone of Influence (ZoI) for recreation pressure will comprise: a) SAMMS (Strategic Access Management and Monitoring);- Development will be required to provide a financial Mitigation Contribution towards SAMMS mitigation for recreation impacts on the protected site, and; b) Any other specific measures to avoid impacts on the Berry Head to Sharkham Point component of the South Hams SAC identified by Appropriate Assessment Developers must clearly demonstrate that mitigation can and will be provided to ensure no adverse effect on the integrity of the European site. Mechanisms through which mitigation delivery will be achieved, secured in perpetuity, and delivered within agreed timescales must also be identified. All mitigation is to be delivered in accordance with the most recently adopted/approved version of the strategy and supporting guidance. Any deviation from the above measures must be clearly justified and will be considered on a case-by-case basis.
South Hams SAC Greater Horseshoe Bats	Development that could impact Greater Horseshoe Bats will be located and designed to protect the integrity of the South Hams SAC by: 1. Avoiding the loss, damage, or illumination of, or disturbance to, Greater Horseshoe Bat: a. roosts which are known, or are likely, to provide significant functional support to the SAC; b. foraging areas within the Sustenance Zones, especially within juvenile foraging areas;

	c. flyways and commuting routes within the Sustenance Zones; d. networks of actual or potential commuting routes within the Landscape Connectivity Zone; e. existing mitigation features resulting from previous development; f. known or likely pinch points; and g. foraging areas within the Landscape Connectivity Zone where they are of particular importance e.g. due to their size or proximity to a roost. 2. Maintaining, enhancing, or creating sufficiently wide and dark stand-off zones between the development and bat flyways / habitats, to protect the bats and their commuting routes/habitats from impacts from development; 3. Designing development and lighting to be compatible with known or potential Greater Horseshoe Bat habitats and flyways, as demonstrated through lighting modelling where required. Particular attention must be given to maintaining dark corridors and low-light environments, especially where development is proposed at the edge of the built-up area; 4. Avoiding likely increases in death or injury to bats through interaction with wind turbines or traffic; 5. Creating or enhancing roosts, commuting routes and foraging zones, where required by Appropriate Assessment and/or when opportunities arise; 6. Maintaining connectivity within and between Sustenance Zones through the Landscape Connectivity Zone, especially across roads, railway lines or other linear barriers; 7. Where required by Appropriate Assessment, providing financial contributions to help create permanent, high quality Greater Horseshoe Bat habitat and roosts in locations which increase population resilience; 8. For the purposes of undertaking Habitats Regulations Assessment, complying with the 2019 South Hams SAC Habitats Regulations Assessment Guidance (or subsequent revisions) and technical advice notes; and 9. Avoiding the loss, damage, pollution of, or other harm to habitats which are also listed as Qualifying Features for which the South Hams SAC was designated. Where Greater Horseshoe Bat mitigation is required, a scheme of monitoring, to ensure mitigation has been carried out and is effective, including any remedial

	measures required, will be agreed and secured prior to granting planning permission.
Lyme Bay and Torbay Marine SAC	Water Quality: In respect of the Lyme Bay and Torbay Marine SAC the council has commissioned a Water Cycle Study and a Sewer Capacity Assessment. This evidence sets out the measures required to ensure there are no cumulative adverse impacts on the Marine SAC resulting from combined sewer overflows (CSO). Mitigation for CSO increase and the removal of surface water from the combined sewer system is set out in detail in Policies ER2, ER3, ER4 and will comprise: 1. All development must minimise the generation of run-off and reduce surface water entering the combined sewer system and maximise the use of permeable natural surfaces 2. All development must comply with the requirements of Policy ER2 and submit detailed drainage arrangements at the application stage to enable the Local Planning Authority to undertake a Habitats Regulations Assessment screening and, where necessary, an Appropriate Assessment. Additional mitigation for surface water runoff will be provided through the implementation of Policy GIS 'Strategic Green infrastructure'. Lyme Bay and Torbay Marine SAC Is also sensitive to changes in water quality arising due to the construction/operation of development. This typically includes, but is not limited to, major development or demolition located within 250m of the designated site, or near a watercourse which provides a hydrological link to the Lyme Bay and Torbay SAC. Where there is a risk of adverse effects on the Lyme Bay and Torbay SAC due to water quality, development proposals must prepare and submit, as part of a planning application, Pollution Prevention Plans. Recreation: Individual planning applications that have a clear link to increased recreational use of the coast will be subject to project-level HRA, and a bespoke package of measures will need to be secured to address the specific impacts of the proposed project.

Explanation

- 9.44 As a Competent Authority, the planning authority must carry out Habitats Regulations Assessments (HRA) in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). Torbay currently contains two internationally important habitats sites: the South Hams SAC and the Lyme Bay and Torbay Marine SAC.
- 9.45 All plans and projects not directly connected with the conservation management of a habitats site require HRA Screening to assess potential significant effects. Where significant effects cannot be ruled out, an Appropriate Assessment must be undertaken. Planning permission can only be granted where adverse effects on site integrity are excluded, or where there are imperative reasons of overriding public interest and adequate compensatory measures are secured.
- 9.46 Sites protected under the Conservation of Habitats and Species Regulations 2017 consist of:
- Special Areas of Conservation (SAC);
 - Special Protection Areas (SPA);
 - Proposed SACs;
 - Potential SPAs;
 - Areas secured as sites compensating for damage to a European site.
- 9.47 South Hams SAC:
The Berry Head to Sharkham Point component of the South Hams SAC forms part of the UK's national site network and is designated for its heathland, calcareous grassland, vegetated sea cliffs and caves. These habitats are of importance for conservation at a European level and are listed under Annex I of the Habitats Directive (Council Directive 92/43/EEC). Berry Head is also designated as a Site of Special Scientific Interest (SSSI), National Nature Reserve and Local Nature Reserve. The habitats at Berry Head are vulnerable to degradation through erosion by walkers and eutrophication through dog fouling, in addition to scrub encroachment.
- 9.48 A visitor survey in 2023 found that 75% of visitors to Berry Head came directly from home within 8 km of the site, compared to 5 km in 2016. This indicates that the primary Zone of Influence (Zoi) for recreational impacts on Berry Head is an 8 km radius (Figure 21).

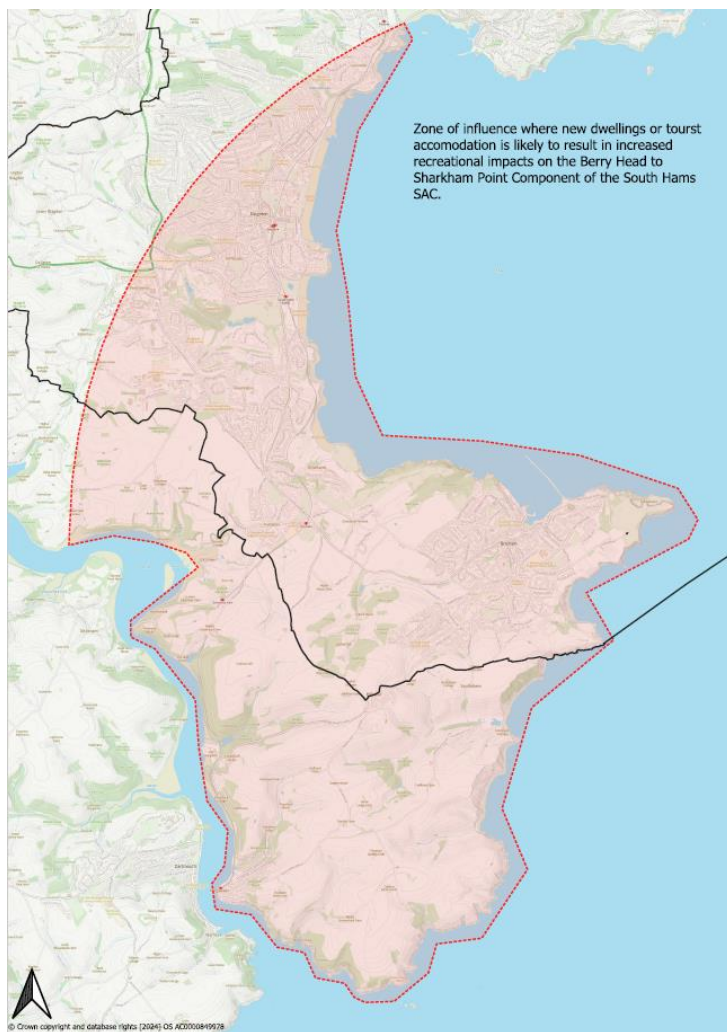


Figure 20 - Berry Head to Sharkham Point Zone of Influence

- 9.49 The Local Plan will provide approximately 285018 new homes within the Zone of Influence for recreation pressure on the Berry Head to Sharkham Point Component of the South Hams SAC. Significant effects from increased recreation due to the development of housing or tourist accommodation within the ZoI cannot be ruled out and mitigation measures will be necessary.
- 9.50 The council, in collaboration with stakeholders, will develop detailed mitigation measures and associated cost estimates. A Supplementary Planning Document (SPD) will set out the mitigation costs and the mechanism for securing developer contributions.
- 9.51 Suitable Alternative Natural Greenspace' (SANG) is green space of a type and quality suitable to be used as mitigation for applications likely to affect European and

¹⁸ Note this is a draft figure which may be subject to change

internationally protected sites. Its role is to provide alternative green space to divert visitors away from the protected site.

- 9.52 The South Hams SAC is also been designated for Greater Horseshoe Bats (GHB), one of Britain's rarest bat species. Greater Horseshoe Bats use hedgerows (including remnant hedges and veteran trees) as flyways.
- 9.53 Greater Horseshoe Bats have only short-range echolocation, which means they must fly close to the ground and linear features, such as hedges, woodland edges, and vegetated watercourses. They actively avoid light levels above moonlight. As a result, development must protect natural features that provide landscape connectivity and avoid lighting that deters bats. The bats use a variety of different roosts at different times of the year, including maternity and hibernation roosts. They feed in different habitats throughout the year, depending on seasonality of prey, typically foraging up to 4km from the roost as an adult. This 4km radius is used to determine the "Sustenance Zones" around roosts, although they will travel further when moving between different roosts. Juveniles typically only forage within 1 km of the roost in their first summer, so foraging habitat close to maternity roosts is particularly important. Hibernating bats are known to feed less frequently and within shorter distances during winter months.
- 9.54 The council has jointly adopted the South Hams SAC Habitats Regulations Assessment Guidance. The guidance assists those submitting planning applications for development that could have an adverse effect on the integrity of the South Hams SAC Greater Horseshoe Bat population. The document identifies a Consultation Zone which includes roosts, Sustenance Zones, and Landscape Connectivity Zone. It also identifies pinch points, where further development could restrict the movement of bats and existing mitigation features required for previous developments.
- 9.55 The Lyme Bay and Torbay Marine SAC:
Torbay has a rich marine environment with its coastal waters designated as both a Marine SAC and a Marine Conservation Zone (MCZ). The SAC includes reefs and sea caves, supporting a variety of marine life. The MCZ protects nine different marine habitats which include seagrass beds and the intertidal area.
- 9.56 The features of the Marine SAC and the MCZ are sensitive to changes in water quality. Sewer spills and sewer flooding must be avoided. Pollution from surface water run-off—such as oil, chemicals, and other contaminants—during construction and operation phases can have cumulative negative impacts on water quality and coastal species. Discharges of pollution from the land may alter physicochemical conditions of coastal waters, including temperature, turbidity, salinity, and nutrient levels, affecting designated features.

- 9.57 The Local Plan includes measures to reduce the impacts of development on coastal waters and minimise sewer outfalls, particularly at Hopes Nose, Torquay. Relevant policies include ER1, ER2, ER3, ER4, W5, and GIS.
- 9.58 The SAC Sea caves are unique within the UK and contain very sensitive fauna that are vulnerable to damage. Risk of damage of damage can arise due to recreational activities such as wild swimming, kayaking, paddleboarding, personal watercraft use, diving, coasteering, and shoreline access at low tide.
- 9.59 At present the SAC sea caves are recorded as being in Favourable condition. There is no evidence currently available to conclude that recreational activities are damaging the SAC features, or that recreational activities are attributable to the housing numbers identified in the Local Plan. Individual planning applications that have a clear link to increased recreational use of the coast will need to be subject to project-level HRA, and a bespoke package of measures will need to be secured to address the specific impacts of the proposed project.

Policy NC1: Biodiversity and ecology

Part 1: Protection of internationally and nationally important wildlife sites

Internationally and nationally important sites and species will be protected.

Development proposals must undertake a thorough assessment of impacts on internationally and nationally important sites (both individually and in combination with other developments) and must avoid impacts in the first instance. Development that enhances internationally and nationally important sites will be supported.

Development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless it is demonstrated that all the following criteria are met:

- i) Alternative sites have been considered, and the development cannot be located on an alternative site that would cause less or no harm.**
- ii) The proposal cannot be achieved through an alternative, less harmful design or form.**
- iii) Suitable avoidance and mitigation (and exceptionally compensation) measures are proposed, in accordance with the mitigation hierarchy.**

- iv) In respect of European sites, the effects can be fully mitigated and the integrity of the site will be maintained.
- v) The public benefits of the proposal clearly outweigh the harm.
- vi) Where permanent or long-term temporary habitat loss or direct reduction of habitat condition is identified, bespoke compensation measures will need to be agreed. This must be undertaken as early as possible and include utilisation of the Discretionary Advice Service from Natural England.

Development likely to affect an international site will be subject to assessment under the Habitat Regulations. Currently there two European designated sites within the Torbay boundary, the South Hams SAC and the Lyme Bay and Torbay Marine SAC. Internationally and nationally important designations are listed in detail in Appendix D.

Part 2: Protection of regionally and locally important wildlife sites and features

Development which conserves, restores or enhances regionally and locally important wildlife-rich sites, networks, priority habitats and geodiversity will be supported.

Development proposals that would cause a direct or indirect adverse effect upon the above will not be supported unless the following three criteria are met:

- i) They cannot be located on alternative sites that would cause less or no harm. Every effort has been made to minimise any damage.
- ii) The public benefits of the proposal clearly outweigh the impacts on the features of the site, the wider network of natural habitats and designated sites
- iii) Suitable avoidance, mitigation and compensation measures are proposed, in accordance with the mitigation hierarchy.

Developments should provide an assessment of biodiversity value. This should particularly include any features that have previously been identified that would support designation as a County Wildlife Site or Regionally Important Geological Site and measures to conserve and enhance them.

Community and Corporate Plan – Protecting and enhancing our natural environment

Explanation

- 9.60 Statutory designated wildlife sites benefit from substantial protection under national legislation. This policy does not duplicate these protections but provides additional detail on permissible impacts and biodiversity enhancement expectations.
- 9.61 International and nationally important sites falling under this policy include:
- a. Special Areas of Conservation (SAC)
 - b. Special Protection Areas (SPA)
 - c. Proposed SACs
 - d. Potential SPAs
 - e. Ramsar sites
 - f. Areas secured as compensation for damage to an internationally or nationally designated site
 - g. Sites of Special Scientific Interest (SSSI)
 - h. Marine Conservation Zones (MCZ)
 - i. National Nature Reserves (NNR)
- 9.62 Regionally and locally important wildlife and geological sites include:
- a. Local Nature Reserves (LNR)
 - b. County Wildlife Sites (CWS)
 - c. Other Sites of Wildlife Interest (OSWI)
 - d. Regionally Important Geological Sites (RIGS)
 - e. Special verges
 - f. Habitats of Principal Importance, as listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (identified through site survey work or as identified through existing mapped resources)
- 9.63 The NPPF requires local plans to identify and map sites of international, national and local importance and to follow the mitigation hierarchy: avoid harm where possible, mitigate impacts where unavoidable, and compensate for harm only as a last resort. Where harm involves protected species of European significance, it must be noted that compensation can only be considered where it can be shown that the development proposal is in the national interest.
- 9.64 Torbay supports both European and UK protected species, as well as UK priority habitats. Notably, Torbay hosts a large population of Cirl Buntings—one of Britain’s most endangered songbirds. Targeted conservation has increased their numbers, and guidance

on safeguarding this species has been produced by Devon County Council and the RSPB (November 2014). Development must protect Cirl Bunting habitats directly or contribute to offsetting through provision of receptor habitats.

- 9.65 Torbay also supports populations of bat species, reptiles, seabirds and seahorses, which are protected under legislation including the EU Habitats Regulations and the Wildlife and Countryside Act 1981, as well as local frameworks such as County Wildlife Sites. Torbay also has several areas of ancient woodland that form an irreplaceable biodiversity resource both for its diversity of species and for its longevity as woodland. Veteran or aged trees outside ancient woodland are also particularly valuable. Irreplaceable habitats should be protected; to be acceptable, development would clearly need to outweigh any harm.
- 9.66 Torbay's coastal waters are designated as the Lyme Bay and Torbay Marine Special Area of Conservation (SAC) and as a Marine Conservation Zone (MCZ). These areas support reefs, sea caves, and diverse marine life. The Local Plan requires development to minimise impacts on sewer outfalls, particularly at Hopes Nose, Torquay. Sustainable urban drainage systems (SuDS) and water-sensitive urban design are promoted through Policies ER1, ER2, ER3, and W5.
- 9.67 The council will seek to improve Torbay's biodiversity and geodiversity, including increasing the number and proportion of Local Wildlife Sites (CWS and RIGS) in 'positive management'. This could include enhancing the status of Proposed and Unconfirmed Wildlife Sites (UWS). The Council will therefore seek to gain appropriate protection and recognition for locally important sites commensurate with their importance. Development should be located to minimise its impact on biodiversity. Development should follow the mitigation hierarchy - where impacts occur, mitigation and/or compensation will be required,. Measures such as strengthening of flight paths, corridors, appropriate planting of biodiversity-rich species, the creation of habitats and biodiversity management programmes will be required through planning condition or s106 Planning Obligations. Biodiversity impact is an on-site acceptability matter and cannot be avoided to improve scheme viability.
- 9.68 New development should maximise opportunities to incorporate wildlife features through landscaping and design; this may include artificial bird nesting and bat roosting sites/boxes.
- 9.69 A schedule of Torbay's SSSIs, National Nature Reserves and Local Sites of Wildlife and Geological Interest is set out in Appendix D. The Local Plan Policy NC2 supports the RSPB's aspiration for an average provision of one new bird or bat box per new dwelling.

Policy NC2: Species of principal importance

Development proposals that would have an adverse impact on European Protected Species (EPS), Nationally Protected Species, Section 41 Priority Species, or Devon Local Priority and Special Species will not be supported.

Particular regard must be given to potential impacts on Cirl Bunting habitats and territories. Development affecting Cirl Buntings will only be permitted where the benefits of the proposal clearly outweigh the impacts, including cumulative effects, and where those impacts can be fully mitigated.

Development must reflect species-specific guidance, including the Devon Local Nature Recovery Strategy and the most up-to-date Torbay Green Infrastructure Strategy.

All development should incorporate opportunities to enhance habitats for Protected and Priority Species within the built environment in addition to features required as part of biodiversity net gain, mitigation or compensation. This may include features such as bird, bat and invertebrate boxes, swift bricks, bee bricks, and hedgehog holes and permeable boundaries.

Enhancement provision should be proportionate to the scale of development. As a minimum guide, the following should be provided per dwelling or per 100 sqm of non-residential floorspace as a minimum, in suitable locations:

- a. 2-4 integrated bird boxes such as swift bricks
- b. 1-2 bat boxes
- c. 1 bee brick

Where appropriate, a monitoring scheme must be agreed and secured prior to granting planning permission. This should ensure mitigation measures are implemented effectively and include any necessary remedial actions.

Community and Corporate Plan – Protecting and enhancing our natural environment

Explanation

- 9.70 A wide range of species are protected under international and national legislation both within and outside designated protected habitats. In Torbay, European Protected Species

include bats, hazel dormouse, and great crested newt. UK Protected Species include cirr bunting, barn owl, and Deptford pink.

- 9.71 Species listed as of Principal Importance under Section 41 of the Natural Environment and Rural Communities Act 2006 are also protected through national planning policy. The list includes over 800 species such as hedgehog, skylark, and brown hairstreak butterfly.
- 9.72 The Devon Local Nature Partnership has identified approximately 1,600 species considered rare in Devon (Devon Priority Species), along with a list of 96 species known as Devon's Special Species, for which the county has a particular conservation responsibility, including the long-snouted sea horse, grey long eared bat and hazel dormouse.
- 9.73 Further species-specific guidance is available on the council's website and Devon County Council's website.
- 9.74 Development can positively or negatively affect biodiversity, depending on its location, design, and mitigation. This policy aims to ensure development delivers biodiversity benefits and supports the objectives of the Environment Act 2021.
- 9.75 The NPPF (paragraph 185b) emphasises enhancing ecological networks and recovering priority species. This policy supports those aims by requiring features that benefit priority species which can thrive in urban environments if provided with suitable habitats.
- 9.76 Guidance from organisations such as the National House Building Council and UK Green Building Council highlights cost-effective, low-maintenance measures that integrate biodiversity into the built environment.
- 9.77 Additional features for wildlife enhancement:
- a) Reptile/amphibian hibernacula;
 - b) Brash and log piles;
 - c) Invertebrate bricks and bee hotels;
 - d) Wildlife ponds;
 - e) Sustainable urban drainage systems (e.g. swales and pools with native vegetation);
 - f) Native hedge planting;
 - g) Swift/wildlife towers and green roofs;
 - h) Artificial nest cups for house martins
 - i) Barn owl lofts;
 - j) Bat, bird, and dormouse boxes in trees and hedges.

- 9.78 These features should be designed with input from qualified ecologists and integrated into development to ensure longevity and retention.

Policy NC3: Biodiversity Net Gain

On all development sites, a measurable 10% Biodiversity Net Gain (BNG) must be achieved, where development is exempt as set out within The Biodiversity Gain Requirements (Exemptions) Regulations 2024.

The 10% BNG shall be delivered on-site wherever possible. Where it is not possible to achieve this level of biodiversity net gain on site, or where onsite net gain would not generate the most benefits for nature conservation, off-site provision will be considered, in accordance with the Biodiversity Gain Hierarchy (avoid harm in the first instance).

When identifying opportunities for on- and offsite biodiversity net gain, the location, type and form of net gain should seek to support nature-based solutions to climate change, manage surface water run off, reduce flood risk and preserve best and most versatile agricultural land. Net gains should be located to help to deliver the most up to date Torbay Green Infrastructure Strategy and/or the Devon Local Nature Recovery Strategy by reflecting the strategic significance of sites (defined in glossary).

Off-site BNG provision should be prioritised within Torbay. Where this is not possible or would not deliver the most strategically significant or ecologically appropriate outcomes, provision should be directed to locations within the Devon, Plymouth and Torbay Local Nature Recovery Strategy area. Where this is not achievable, an alternative location may be used where it would deliver more strategically significant or ecologically appropriate biodiversity net gains.

BNG habitats (whether delivered on-site or off-site) must be secured, managed, monitored and maintained for a minimum period of 30 years in accordance with an approved Habitat Management and Monitoring Plan. Proposals should demonstrate how long-term stewardship arrangements, funding and responsibilities for maintenance will be secured for the duration of the management period.

Notwithstanding the Biodiversity Gain Requirements (Exemptions) Regulations 2024, all development proposals should incorporate biodiversity enhancements into their design. Development proposals where the main objective is to conserve or enhance

biodiversity or geodiversity, or to create greater resilience of biodiversity or geodiversity to climate change, will be supported in principle.

Development that results in the loss or deterioration of ‘irreplaceable habitats’ will not be permitted.

Community and Corporate Plan – Protecting and enhancing our natural environment

Explanation

- 9.79 This policy seeks to achieve 10% BNG (as required by legislation) and provides additional guidance on how and where BNG should be delivered, with a preference for delivery locally within Torbay and reflecting the Devon, Plymouth and Torbay Local Nature Recovery Strategy.

Policy NC4: Light pollution

All development proposals will be designed to avoid, minimise, and mitigate, any harm arising from light pollution, lightspill or glare. Proposals for external lighting, new development/uses that will require external lighting, or designs that includes large areas of glazing or reflective materials will only be permitted where all the following apply:

- i) Any external lighting is demonstrated to be necessary for the development or use and the amount of lighting used is the minimum required for security/safety and/or operational purposes;
 - ii) Light spillage or glare will be minimised to an acceptable level;
 - iii) The character of the surrounding landscape and seascape, character and visual amenity of streetscape or townscape, and heritage significance is conserved or enhanced, taking account of existing light levels. Particular weight will be given to the conservation or enhancement of the South Devon National Landscape’s dark skies and Greater Horseshoe Bat foraging and commuting habitats;
 - iv) Ecological interests are conserved or enhanced, taking account of the level of protection of the species and habitats and the type, duration, and intensity of artificial light/light spill/glare;
 - v) There is no adverse effect on the integrity of a European Wildlife Site.
- Proposals likely to affect South Hams SAC bats through increased lighting will

require a lighting assessment and design strategy prior to inform a project level HRA prior to permission being approved.

Any harm that remains once a proposal has been mitigated will be balanced against the need for the development/use, along with any public benefits that would result.

Where new development would require artificial lighting to operate, e.g. for reasons of security or safety, or where development would introduce a new use sensitive to light intrusion, particular consideration will be given to the suitability of the location for the development.

Proposals for lighting schemes that would improve the safety or visual amenity of areas within the public realm, historic townscapes or better reveal the significance of a heritage asset and its setting will be supported subject to the above.

Community and Corporate Plan – Protecting and enhancing our natural environment

Explanation

- 9.80 Artificial lighting can provide social benefits, such as street lighting and enabling recreation outside daylight hours. It can also help to enhance the public realm or heritage significance. However, there is a growing body of evidence that shows how Artificial Light At Night (ALAN) can have negative impacts on the health of both terrestrial and marine ecosystems through disrupting natural light-driven cycles that regulate marine life, migration, reproduction and feeding patterns.
- 9.81 Light pollution is a driver of insect decline and many night-flying species of insect that bats hunt are attracted to light, especially those light sources that emit an ultraviolet component or have a high blue spectral content. Broad winged bat species (including Greater Horseshoe Bats) have been shown to avoid illuminated commuting and foraging. Consequently, these bat species are put at a competitive disadvantage and are less able to forage successfully and efficiently in well-lit areas. Continuous lighting in the landscape, such as along roads or waterways, creates barriers which many bat species cannot cross, even at very low light levels.
- 9.82 In addition to the environmental impacts, ALAN can affect human health and well-being, with links to cancer, diabetes and sleep disorders.
- 9.83 The proliferation of short-wavelength, blue-toned white lights since the advent of energy-efficient light-emitting diodes (LEDs) in the early 2000s has compounded this issue. This type of light is strong enough to penetrate deep into coastal waters, reaching more than 40 metres beneath the surface in areas with clear water and high intensity illumination.

- 9.84 Alongside our rare terrestrial and marine life, parts of Torbay are within the **South Devon National Landscape**. The impact of light pollution and skyglow can be seen across the National Landscape and can negatively impact landscape, seascape, townscape/streetscape character and heritage significance.
- 9.85 There are often technical and practical ways that the impacts of ALAN can be reduced or removed, e.g. through careful design, positioning and direction, sensors, or reduction in the intensity or hours of use. Impacts can also be reduced by avoiding short wavelength blue light and using longer-wavelength, redder bulbs or, at a minimum, lower colour temperature LEDs.
- 9.86 Proposals including significant external lighting will require a lighting impact assessment prepared by a lighting specialist. Where permission is granted, conditions may control hours of illumination, light angles, intensity, column heights, colour specification, and retention or provision of screening vegetation or bunding.

Strategic Policy GE1: Geodiversity and English Riviera UNESCO Global Geopark

All development must conserve and enhance Torbay's terrestrial and marine geodiversity, particularly the geosites identified within the English Riviera UNESCO Global Geopark (ERUGGp).

Development must provide a level of protection to locally significant geological sites which are undesignated, commensurate with their importance.

Development proposals that would cause a direct or indirect adverse effect upon both of the above will not be supported unless the following criteria are met:

- i) They cannot be located on alternative sites that would cause less or no harm. Every effort has been made to minimise any damage.**
- ii) The public benefits of the proposal clearly outweigh the impacts on the features of the site and the wider network of geosites.**
- iii) Suitable avoidance, mitigation and compensation measures are proposed, in accordance with the mitigation hierarchy.**

Developments should provide an assessment of geological interest, including any features that would support designation as a Regionally Important Geological Site and measures to conserve and enhance them. The objectives of the most up to date ERUGGp Management Plan must also be taken into consideration.

The promotion, improvement and appropriate management of Torbay’s special geological qualities will be supported and will be a key element in promoting sustainable tourism and fostering pride in the area’s unique environment. The council will seek to promote public access to, appreciation and interpretation of geodiversity.

Community and Corporate Plan – Protecting and enhancing our natural environment and heritage

Explanation

- 9.87 Torbay’s designation as a Global Geopark is based upon the outstanding international importance of 32 geosites (i.e. sites of significant geological interest within the Geopark) spanning a story of three geological time periods over 400 million years. In this context, Torbay has made a huge historical contribution in terms of the development of geological and archaeological sciences. The consideration of geology as part of the planning process alongside appropriate conservation, management, and enhancement of geology is fundamental to the retention of the status.
- 9.88 Within Torbay there are eleven geological Sites of Special Scientific Interest (SSSIs) and sixteen Regionally Important Geological Sites (RIGS). The designation integrates these sites, which are listed in Appendix D. Many of Torbay’s geologically important sites are disused quarries that have exposed geological and fossilised features. Development affecting geological sites of interest should retain, protect and provide for the appropriate management of such features.
- 9.89 It is known that there are sites of geological significance in Torbay where the geological value is yet to be recognised/recorded because the sites have not yet been designated. As such, any new or temporary exposures may reveal new sites of value worth recording and/or protection. These sites could be in the form of an old quarry, cliff face or cutting, or sites subject to coastal erosion on the foreshore.

Strategic Policy GIS: Green and blue infrastructure

Torbay has a rich and varied green and blue infrastructure (GBI) network based on its coastline and urban/rural landscape.

Development will be required to protect, enhance and integrate with the existing GBI network and deliver new high quality GBI tailored for and accessible to local needs.

Developments should ensure that new and existing GBI forms a multifunctional network which maximises the full range of potential benefits as far as possible. In doing so, development will support the Local Plan's strategic aims by increasing the quantum, quality and capability of GBI to be a resource that underpins Torbay's environmental, social and economic success.

Development will support the strategic local needs for specific GBI as identified in relevant local strategies and evidence (see explanation para 9.95). The existing Country Parks designated in Torbay are: i) Cockington, Torquay, ii) Ocombe Farm, Paignton and iii) Berry Head, Brixham. These important GBI assets will be protected and enhanced.

The Local Plan makes specific provision for:

- iv) A search area for a green burial facility in the Broadsands, Churston, Galmpton Neighbourhood Plan Area and Torquay Gateway;
- i) Nature based solutions to flood risk and surface water management

Developments will be required to make contributions proportionate to their scale for the management and improvement of GBI. Where development is likely to give rise to recreational impacts on the South Hams SAC, it will be required to contribute to and/or deliver green infrastructure and open space enhancements as part of a coordinated mitigation strategy. This may include provision or improvement of accessible green spaces, recreational routes and visitor management measures, in order to reduce pressure on sensitive habitats and ensure no adverse effect on site integrity.

The integration of new GBI with the active travel network (including South West Coast Path and existing foot/cycle paths) will be supported and secured as part of design where possible.

Development should have regard, where appropriate, to relevant national guidance including the Natural England Green Infrastructure Framework, its principles, standards and design guidance.

Development should deliver child-friendly GBI, with safe, accessible opportunities for play, movement and interaction with nature, including the integration of informal play, natural features and opportunities for social interaction.

Site and context analysis must be used to determine the appropriateness of a development proposal in responding to its surroundings, in the context of GBI.

Development will be assessed against how it complies with the following GBI design principles in table GIS-1 below, proportionate to its scale.

Table GIS-1. GBI design principles

Principle	Detail
a)GBI-led Design	GBI must be embedded in the design from the outset, responding to the area’s landscape character context and existing GBI assets, while addressing local issues such as flood risk, health and biodiversity. Public open space and access must be considered early and should help shape the layout of development.
b)Multifunctional and varied GBI	Developments must provide multifunctional spaces that connect to the wider GBI network and deliver multiple benefits, including flood risk mitigation, water management and sustainable drainage, climate adaptation, health and wellbeing, economic value, nature recovery and, where relevant, the management of recreational pressure on designated sites. Development should also contribute to a varied GBI network, incorporating a range of types and scales.
c)Evidence based provision	The types of space provided must be tailored to community needs and informed by early engagement and local GBI evidence (see explanation).
d)Safe & Inclusive Public Spaces	Public open spaces, access routes, and green corridors must be designed to be safe, inclusive and attractive for all users. Development should ensure that spaces are accessible, overlooked, and support independent mobility, informal play and everyday use, contributing to community cohesion, active lifestyles and social inclusion.
e)Habitat, Protection Creation & Restoration	GBI must create and restore native, wildlife-rich habitats and contribute to local GBI objectives including, where appropriate, supporting the priorities of the Devon Local Nature Recovery Strategy and delivery within identified High Opportunity Areas, and delivery of BNG. Where relevant, GBI must support the protection of the South Hams SAC, including mitigating impacts on Greater Horseshoe bats and reducing recreational pressure through the provision and enhancement of appropriate alternative green space and access opportunities.

f) Long-Term Stewardship	Long-term stewardship, management, and funding for the upkeep of new and existing GBI must be secured, with Torbay Council seeking adoption of GBI provided through development.
g) Avoiding GBI Loss	All development must be located and designed to avoid the loss or fragmentation of GBI.

Community and Corporate Plan – Place and Community

Explanation

- 9.90 Green and blue infrastructure (GBI) refers to a network of multi-functional green and blue spaces and other natural features, in both urban and rural areas, which deliver a wide range of environmental, economic, and health and wellbeing benefits for nature, climate and communities.
- 9.91 GBI exists at a variety of scales and forms across Torbay, from small-scale features such as trees, grass verges, green roofs and living walls, to larger assets including coastlines, beaches, parks, wetlands and community gardens. The South West Coast Path, as part of the King Charles III England Coast Path, is also a key component of this network, providing significant recreational, health and wellbeing benefits, and supporting the local visitor economy. All elements, regardless of size, contribute to the overall network and play an important role in its function. GBI in Torbay forms part of its natural heritage and provides opportunities for the public to enjoy and access the historic environment.
- 9.92 The Local Plan identifies Torbay's three Country Parks (Cockington, Ocombe and Berry Head) as key components of the GBI network, as shown on the Policies Map.
- 9.93 Relevant evidence supporting the delivery of green and blue infrastructure includes, but is not limited to: Torbay Green Infrastructure Delivery Plan, any future Green and Blue Infrastructure Strategy for Torbay, Open Space, Sport and Recreation Strategies, the Local Nature Recovery Strategy and its mapped High Opportunity Areas where appropriate, the Devon Tree Strategy and local tree strategies.
- 9.94 Development at all scales should consider opportunities to protect, enhance and connect GBI. Sustainable drainage and water management is a critical issue in Torbay. All development must prioritise the delivery of natural flood and water management rather

than relying on engineered approaches. See Policies ER1, ER2, ER3 and ER4 for detailed drainage requirements.

- 9.95 GBI contributes to several of the Local Plan's strategic priorities, including climate resilience, nature recovery, health and wellbeing, transport and economic prosperity. The following Local Plan policies
- 9.96 GBI can also have historic and archaeological significance, particularly at locations such as Cockington (Torquay) and Berry Head (Brixham). Policies HES and HE1 should be applied where relevant.
- 9.97 The Local Plan makes provision for a burial facility as a key specific green infrastructure need. Analysis shows that burial facilities in Torbay are nearing capacity. Local evidence suggests that Torbay needs to provide up to 1,500 burial plots over the Plan period, equating to at least 1ha of land. The Local Plan identifies two areas of search for burial facilities, set out above.
- 9.98 Visitor monitoring at Berry Head during the summer of 2023 showed a 16% increase in total footfall per hour, compared to 2016. Vegetation monitoring carried out in the same year revealed changes in the character of the habitats for which Berry Head is designated, with a decline in the condition of sensitive areas compared to monitoring in 2016. This is evidence that visitor numbers at Berry Head have exceeded capacity, and on-site mitigation alone is unlikely to prevent further degradation from recreation linked to new housing and tourism development. The Local Plan HRA sets out that a strategic approach to providing alternative or enhanced recreation opportunities within the zone of influence will need to be provided and funded through development contributions (see Policy NCS2).
- 9.99 GBI is integral to sustainable development, supporting health and wellbeing, economic vitality, air quality, nature recovery, and climate adaptation. It contributes to net zero targets and provides urban cooling and flood risk management. The Council will seek to protect and enhance the green infrastructure network.
- 9.100 In assessing the needs and opportunities for GBI, proportionate to its scale, development should be sensitive to its local context and make best use of local evidence. This evidence should be used to determine the strategy and design of GBI elements. This may include utilising landscape assessments, ecological data, health and wellbeing data, local sources of information on communities, etc. Careful and targeted engagement as part of the development design process, with the local authority, stakeholders and the wider community offers rich potential to understand local needs and design the best solutions. When considering access for all potentially disadvantaged groups of people based upon age, socio-economic status, sex and mobility should be considered.

- 9.101 Where GBI provision is supported by quality assessments aligned with industry standards (e.g., Building for a Healthy Life, Building with Nature), this will be encouraged and adds weight to the justification of approach.
- 9.102 The council will work with partners to improve Torbay's terrestrial and marine environments through a network-wide approach that includes the links between spaces, the multiple purposes they can have and wider environmental benefits.

Chapter 10: Our Shared History - Protecting and enhancing Torbay's heritage and identity



Figure 21 - Our Shared History

Introduction

- 10.1 Torbay has a rich and varied history, which has helped create a high-quality built environment in which to live, work and visit. The Community and Corporate Plan aims to maximise heritage and cultural opportunities for the enjoyment and benefit of residents and visitors.
- 10.2 The first **Torbay Heritage Strategy** was adopted in November 2020 with a new Strategy proposed for 2026.. It describes Torbay's rich heritage and sets out objectives to conserve, manage and enhance Proposals should have regard to this document or any update.

- 10.3 Torbay's relationship with the sea has helped shape Torbay's built form. Its history is evidenced by a wide range of historic features, including Palaeolithic sites and finds of international importance (e.g. Kents Cavern), Bronze and Iron Age field systems in St. Marychurch, mediaeval manors that remain the basis of settlement patterns, the best preserved monastic remains in Devon, and Napoleonic and Second World War fortifications in Brixham. Paignton boasts one of the oldest purpose built cinemas in Europe. During the 19th Century, the main settlements in Torbay expanded in a very different way from previously. The arrival of the railway and development of tourism, combined with the close relationship with the coastal strip, the sea and buildings, resulted in the creation of the English Riviera. This was and remains strongly influenced by an Italianate aesthetic, especially characterised by large ornamented villas set in landscaped grounds:
- 10.4 The integration of Torbay's heritage assets with modern development forms an important part of the conservation and development of Torbay's unique character.
- 10.5 The Local Plan places great emphasis in regenerating urban areas, many of which contain both designated and non-designated heritage assets. Regenerating urban areas, particularly in town centres and harbourside and Waterfront Areas is one of the few options Torbay has to provide high quality homes, and the public benefit that development achieves must be recognised in the planning balance. Urban renewal, regeneration, and effective management of the historic environment can give rise to competing pressures. Sensitive development management is essential to ensure heritage assets and key features are conserved and where possible enhanced through heritage-led regeneration while ensuring good quality development which contributes to the community good.
- 10.6 The historic environment adds value to regeneration and has been a major draw in attracting visitors to the Bay and acting as a stimulus to economic and tourist activities. It is also a source of demonstrable local pride as well as a valuable educational and aesthetic resource, and also improves health and wellbeing.

Strategic Policy HES: Historic environment strategy

Development will be required to sustain and enhance monuments, buildings, areas, street furniture, walls and other features which make an important contribution to Torbay's built and natural setting and historic environment, for their own merits and their wider contribution to the character and setting of the Bay. This includes all designated and non-designated heritage assets, including scheduled monuments, historic buildings (both nationally listed and of locally listed), registered historic

parks and gardens, conservation areas, and archaeological remains; and their settings.

All heritage assets and their settings will be conserved, proportionate to their significance.

Proposals which affect heritage assets will be assessed on the following criteria:

- i) The impact on the significance heritage assets, and their settings;
- ii) The need to encourage appropriate adaptations and new uses and to support optimal use value and appropriate urban regeneration;
- iii) The importance of protecting and promoting the assessment and evaluation of Torbay's scheduled monuments and archaeological remains and their settings, including the interpretation and publication of archaeological investigations within the Historic Environment Record;
- iv) The impact on vistas and views of Torbay's historic built environment.
- v) Whether the impact of development, alteration or loss is necessary in order to deliver demonstrable public benefits taking into account the significance of the heritage asset; and
- vi) Whether new development contributes to the local character and distinctiveness of the area, particularly through a high quality of design, use of appropriate materials, or removal of deleterious features.
- vii) Proposals that enhance heritage assets or their setting will be supported, subject to other Local Plan policies.

Community and Corporate Plan – Conserving and Enhancing our Shared Heritage

Explanation

- 10.7 Policy HES seeks to ensure that heritage assets are safeguarded for the future, and where possible enhanced both for their own merits and as part of Heritage led regeneration projects. It is also sufficiently flexible to ensure that any harm to the significance of a historic asset can be weighed against the wider public benefits of an application, e.g. Social, economic and environmental enhancement. An Independent Statement of Heritage Significance will be required in support of an application that has a potential impact on heritage assets, and their settings. This should be proportionate to the

scale of the proposal, and will be particularly relevant to proposals affecting listed buildings and key buildings within conservation areas.

- 10.8 Once heritage assets have been lost, they cannot be replaced, while their significance can be eroded through unsympathetic alteration or inappropriate development within their setting. The council will expect all reasonable efforts to be made to find a viable use for a heritage asset in order to conserve its significance. Where there is evidence of deliberate neglect or damage to a heritage asset, the deteriorated state of the asset will not be taken into account in decision making.
- 10.9 Historic Landscape Characterisation, **Conservation Area Appraisals** and Management Plans **<https://www.torbay.gov.uk/planning-and-building/caal/>**, the **Historic Environment Record (HER)**, and the **Torbay Heritage Strategy** will be used to further inform and understand the contribution that designated and undesignated heritage assets make to Torbay's history, character and communities, and to inform strategies for their sustainable management.
- 10.10 Adapting historic buildings to improve energy efficiency and resilience to climate change is an important consideration. Historic England provides guidance on improving energy efficiency **<https://historicengland.org.uk/images-books/publications/eehb-how-to-improve-energy-efficiency/>** as well as installing heat pumps. **<https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/low-and-zero-carbon-technologies/installing-heat-pumps-in-historic-buildings/>** Where adaptations are carried out, they should be reversible wherever possible.
- 10.11 Torbay also has a rich cultural, geological and social heritage, and is a global Geopark. Policies LS to L4, THS, TH1 and GIS are relevant to natural features and naturalised manmade features (such as hedgerows or historic ruins) of historic and landscape significance.
- 10.12 In determining planning proposals, the council will seek to achieve improvements to the natural, built and historic environment, and will seek to support proposals that enhance these. Regard will be had to the need to find the optimum viable use for both designated and non-designated heritage assets. The use of traditional local materials will be sought where it is appropriate to do so.
- 10.13 The removal of unsightly later additions to historic buildings will be sought when negotiating the change of use of buildings. Policies TO2 and TO3 set out criteria for considering proposed change of use of holiday accommodation, and seeks the removal of unsightly later C20th additions to historic buildings, which were only deemed acceptable to support tourism.

- 10.14 The council has a rolling programme to prepare and update Conservation Area Appraisals and associated Conservation Management Plans, which are available at www.torbay.gov.uk/conservation-area-appraisals. The council will support the designation of a new Conservation Area at Yalberton Valley.

Policy HE1: Designated Heritage Assets (CAs Listed Buildings Structures and Gardens, Scheduled Monuments)

Development proposals should have special regard to the desirability of preserving and enhancing any designated heritage asset including listed buildings, parks and gardens and scheduled monuments, and their setting. Development that has an impact upon a heritage asset will be expected to enhance or better reveal its significance and/or setting, and make a positive contribution to its character and appearance..

In particular, proposals causing substantial harm to, or loss of, a Grade 2 listed building, park or garden will be refused other than exceptional circumstances. Proposals involving substantial harm to or loss of designated assets of the highest significance, notably scheduled monuments, Grade 1 and 2* listed buildings and Grade 1 and 2* registered parks and garden will be refused other than in wholly exceptional circumstances.

Applications affecting the significance of any heritage asset will be required to provide sufficient information to demonstrate how the proposals would impact on the significance of the asset.

Where a proposal results in less than substantial harm to the significance of a designated heritage asset, permission will only be granted where both of the following are met:

- i) The harm is outweighed by clear evidence of wider public benefit, and where appropriate securing a viable long term use for the asset; and
- ii) It is robustly demonstrated that other options avoiding or minimising harm to the asset have been explored and are not reasonably viable.

Suitable uses for listed buildings will be supported where this would help to preserve or enhance their significance and would meet the objectives of the Torbay Heritage Strategy, assist with their removal from the Heritage at Risk Register. Historic features must be restored and deleterious additions being removed wherever

possible. New development should respect the scale, form, orientation, purpose and architectural detailing of any designated heritage asset it affects.

Proposals that help to increase resilience to climate change and secure a sustainable future for designated heritage assets will be supported where they:

- a) preserve or enhance the significance of the asset and;**
- b) facilitate their sensitive re-use where they have fallen into a state of disrepair or dereliction (subject to such a re-use being appropriate to the specific heritage asset)**

Community and Corporate Plan – Pride in Place

Explanation

- 10.15 Policy HE1 deals with designated heritage assets, including listed buildings, Historic Parks and Gardens and scheduled monuments. Conservation areas are also designated heritage assets, Policy HE2 is also relevant to these.
- 10.16 Torbay has over 866 entries in the English Heritage National Heritage List, including 29 of Grade II*. Many are also within conservation areas. Historic buildings are an important part of the character and urban form of Torbay and as such it is important that they are maintained. Conservation is the positive management of change which allows historic building to change and adapt to new uses and circumstances in a way that keeps their heritage value intact and ensures their long-term maintenance and viability.
- 10.17 The Planning (Listed Buildings and Conservation Areas) Act 1990 also provides special protection to listed buildings, and consent is required to make alterations or demolitions to the building, including internal features and features within the curtilage built before 1948.
- 10.18 Torbay also has six parks and gardens which are listed in the National Register of Parks and Gardens of Historic Interest. The Register is intended to ensure that their historic value is taken into account when considering development proposals. Torbay's parks and gardens listed in the national register are listed below. All are Grade II apart from Lupton, which is Grade II*.
- Watcombe (Brunel) Park, Torquay
 - Barton Road Cemetery, Torquay
 - Castle Tor, Torquay
 - Princess Gardens and Royal Terrace Gardens, Torquay

- Oldway Mansion, Paignton
- Lupton Park, Brixham

10.19 A small number of historic buildings or sites have special protection as Scheduled Monuments, which are of national importance. They are protected under the Ancient Monuments and Archaeological Areas Act 1979. Historic England considers applications to schedule or de-schedule monuments on behalf of the Department for Culture, Media and Sport (DCMS). Torbay contains 13 Scheduled Monuments:

- Ashole Cavern, Brixham
- Berry Head Fort and Battery, Brixham
- Hardy's Head Battery, Brixham
- Chambered tomb, 630m north west of Elberry Farm Churston-with-Galmpton
- Kent's Cavern, Wellswood, Torquay
- Prehistoric field system, Walls Hill, Babbacombe
- St Michael's Chapel, Chapel Hill, Torre
- The Bishop's Palace, Tower Road, Paignton
- The Old Redoubt and later Victorian Rifle Range Target, 540m south west of Berry Head Fort, Brixham
- Torre Abbey, Torquay
- Two prehistoric hilltop enclosures, a ditch system and four bowl barrows, 300m north of Barton Pines, Blatchcombe, Paignton
- Windmill Hill Cave, Brixham
- World War II Emergency Coastal Battery and remains of a Victorian practice battery, at Battery Gardens, Brixham.

Policy HE2: Conservation Area protection and enhancement

Proposals within or affecting a Conservation Area should pay special attention to the desirability to preserve or enhance the character and appearance of Conservation Areas.

Proposals affecting Conservation Areas will be assessed on the basis of

- i) **Significance of the asset;**
- ii) **Level of harm;**
- iii) **The public benefits arising from the proposal;**
- iv) **The necessity of carrying out works to adapt or create resilience to climate change, providing the least intrusive method or technology has been adopted;**
- v) **The desirability of retaining key buildings and features within Conservation Areas.**
- vi) **The benefits of identifying a long-term viable use of a heritage asset, particularly those identified as being at risk**
- vii) **The objectives of the Conservation Area Management Plan for the Conservation Area affected by the proposal.**

Proposals involving demolition of buildings or structures of demonstrable significance within Conservation Areas or their setting must show that all options for retention have been assessed. This includes showing that all possible funding sources and other feasible options that would be less harmful, have been explored.

Explanation

- 10.20 Conservation Areas are designated under conservation legislation, currently the Planning (Listed Buildings and Conservation Areas) Act 1990. Torbay has 24 Conservation Areas indicated on the Policies Map. Section 72 of this legislation sets out a duty in conservation areas to pay “special attention to the desirability of preserving or enhancing the character or appearance of the area”.
- 10.21 Key buildings and features within conservation areas are identified within the council's Conservation Area Appraisals. Conservation Area Appraisals and associated Management Plans for each conservation area will be prepared and periodically reviewed.

Demolition within Conservation Areas

- 10.22 Conservation Areas (and listed buildings) are protected by the Planning (Listed Buildings and Conservation Areas) Act 1990. This requires planning permission to be obtained for the demolition of buildings in Conservation Areas, in addition to planning permission for

development. The demolition of buildings or boundary features within Conservation Areas can seriously harm the character and appearance of areas. Many buildings of quite modest architectural merit can still be of importance in Conservation Areas where they form part of a street façade or maintain a pattern of building and open space, or have historic significance.

- 10.23 Many Conservation Areas owe their character to a significant extent to the presence of boundary walls of local stone, which may also serve as retaining walls. Some are listed in their own right but others are protected by the fact that they form part of the curtilage of a listed building or because they are in Conservation Areas. The council aims to ensure that these walls are retained and that, where repair or reconstruction are required, this is carried out sympathetically.

Alterations in Conservation Areas

- 10.24 Roof materials and coverings, chimneys, cornices and mouldings, original windows and shopfronts, railings and boundary walls all make an important contribution to the character of a Conservation Area. Alterations and extensions of buildings in Conservation Areas can easily lead to their visual character being harmed by alterations or extensions which on houses (but not flats or commercial properties) can often be carried out as permitted development. Examples are porches, stone cladding, PVCu windows, dormer windows and satellite dish aerials. In appropriate situations the council will introduce Article 4(2) Directions to bring such items under normal development control
- 10.25 Policy HE2 seeks to balance the need to conserve the character and appearance of conservation areas, with the need to provide resilience to climate change and for buildings to remain suitable for modern occupation. However, proposals should utilise the least intrusive method, such as the use of traditional materials (e.g. wood rather than PVC-u) and locating equipment such as solar PVC-U out of public view where possible. They should take a whole house approach to consider improving energy efficiency of the entire building, rather than focussing just on individual features.
- 10.26 The council's officers and Design Review Panel, will advise applicants and, officers will encourage any alterations or adaptations to be carried out sensitively to the character and appearance of the host building. Additional guidance on adapting heritage assets in the face of the Climate Emergency will be published.

Development proposals in Conservation Areas

- 10.27 It is recommended that when submitting outline planning applications for development within Conservation Areas, details relating to elevations, height, massing and scale are

considered. Inappropriate development just outside the boundary can be as damaging to the character of the area as if it were sited within the Conservation Area. Therefore, development on the fringes of Conservation Areas must be considered as carefully as those within the boundary

Conserving and enhancing Conservation Areas

- 10.28 Many of the proposed urban regeneration sites are within conservation areas. These offer opportunities for conservation area enhancement, for example through traffic management, use of appropriate street furniture and the promotion of enhancement schemes. The aim will be to ensure that changes are sympathetic and features that make a positive contribution to the character of the Conservation Area are not lost. The council will seek to ensure that paving, landscaping, road design and street furniture are appropriate and well designed.
- 10.29 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to determine which parts of their areas should be designated as Conservation Areas and to review their boundaries “from time to time”. The council will consider designating conservation areas where locales have significant architectural or historic value. Similarly, where areas are not of significant historical or architectural value, a conservation area designation can devalue the concept, and the council will consider removing such areas once appropriately reviewed.

Policy HE3: Non-designated heritage assets

Proposals should seek to conserve or enhance the architectural or historic value of non-designated assets and where possible provide a long-term viable use of a heritage asset.

Energy efficiency or climate resilience measures will be supported where possible and appropriate.

Community and Corporate Plan – Pride in Place

Explanation

- 10.30 Non-designated heritage assets do not enjoy specific planning protection (note that all buildings and structures within conservation areas are designated in relation to its

contribution to the significance of the conservation area as a whole). Nevertheless, non-designated assets may be of individual architectural or historic value, and should be conserved where possible, taking into account the need to find viable uses for the assets, and having regard to the wider public value of development.

- 10.31 The council will consider seeking emergency listing of significant heritage assets that are at risk.

Policy HE4: Schedules of redevelopment of heritage assets

Where Proposals involving demolition of all or part of designated heritage assets and within conservation areas, will only be permitted subject to an agreed schedule of redevelopment, and it is demonstrated to the Local Planning Authority's reasonable satisfaction that redevelopment will proceed.

Where proposals include the demolition of period features or materials, they shall be salvaged and reused as far as practicable.

Community and Corporate Plan – Pride in Place

Explanation

- 10.32 The starting point in planning is that buildings of significance to designated heritage assets should be retained, as noted in the above policies and the NPPF (Paragraphs 212-217). Designated heritage assets should be retained and retrofitted to adapt to modern use, where possible.
- 10.33 Where key or significant buildings are demolished, the result can be an unsightly gap which may remain undeveloped for years or decades if developments stall. Therefore, where redevelopment or demolition are granted it will be subject to an appropriate condition ensuring that demolition only takes place in conjunction with the redevelopment. Only in instances where the existing building is structurally unsafe, has no architectural, historic or townscape merit, where archaeological investigation necessitating demolition, of the site is required, will the council consider an earlier demolition, without a schedule for replacement.

Policy HE5: Investigation and preservation of archaeology and historic artefacts

Archaeological and palaeontological remains and their settings should be preserved where the intrinsic and historic importance of these remains outweighs the need for the proposed development. There is a presumption that Scheduled Monuments will be preserved.

Where development proposals affect a site of archaeological potential, the applicant will be required to commission an archaeological assessment or field evaluation and submit the results of any assessment or evaluation to the local planning authority before the application is determined.

Where development has an effect on artefacts, but is assessed to be acceptable, the developer will be required to make provision for appropriate and proportionate archaeological recording, preservation, storage, publication and public curation.

Community and Corporate Plan – Pride in Place

Explanation

- 10.34 Policy HE5 requires that the impact of development on archaeological or palaeontological remains is taken into account in the development process. In most instances, artefacts will be the remains of human activity (“archaeological”). However, the policy also covers pre-human evidence (palaeontological).
- 10.35 Important archaeological remains and their settings should be preserved in situ as a first option, although each case will be taken on its merits. Where development may affect remains, developers should contact the DCC Council’s Archaeology Team before submitting a planning application in order to find out at an early stage whether there are likely to be archaeological constraints. Archaeological appraisals (desk-top studies) and field evaluations may be required for applications where archaeological remains are thought to be present.
- 10.36 Building and landscape proposals should be designed to minimise the disturbance of archaeological remains as far as practicable. The council will encourage the sympathetic management of sites by planning conditions and legal agreements where appropriate.
- 10.37 In most cases archaeological remains will not require withholding planning permission. However, where appropriate the council will use planning conditions or obligations to ensure that the archaeological remains are adequately recorded. This will include

analysis, interpretation, preservation and curation of the findings and the presentation of results to the public.

Chapter 11: Designed with quality - Taking pride in Torbay's place-making



Figure 22 - Benefits of good design and placemaking

Strategic Policy DES: Design and placemaking

Development must be well designed to make best use of land and maximise the density of development, whilst protecting living conditions and amenity, respecting and enhancing Torbay's special qualities, including the natural and built environment including areas and buildings of historic interest.

Proposals that achieve a positive contribution to regenerating waterfront and harbourside areas will be supported subject to other planning considerations.

All development should design out opportunities for crime and disorder.

Explanation

11.1 The Local Plan seeks to maximise opportunities for urban development, especially through town centre regeneration. However, we need to create places that are a good living environment where people want to live, work and play. A high quality of design, that respects living conditions, scale, density, massing, height, material, landscaping, layout, accessibility, safety and security is key to this. Particular attention must be given to conserving or enhancing the character and appearance of conservation areas and other designated heritage assets.

Policy DE1: Design quality and assessment

All development must be well designed, respecting and enhancing Torbay’s special qualities, including the waterfront and natural setting of the Bay, and the character of the natural and built environment including areas and buildings of historic interest and the settlement pattern of the three towns, whilst designing out opportunities for crime and disorder.

Proportionate to the scale of the development, major development will be informed by a townscape and/or landscape assessment, including historical context of the site, existing and previous land uses (including agricultural land quality where appropriate) as well as movement patterns through and/or around the site.

All development proposals will be assessed against their ability to meet the design considerations set out below.

Table 15 Design Considerations for Development

DESIGN CONSIDERATIONS FOR DEVELOPMENT	
FUNCTION	
1.	Be adaptable to future change and needs, including that of occupiers;

2.	Promote diversity through a balanced mix of uses that work together and support sustainable living; Promote living accommodation above commercial uses where possible.
3.	Make the best use of space in terms of ground coverage and height, and achieve maximum density consistent with good design principles;
4.	Be designed to reduce crime and the fear of crime by the promotion of safety and security in the design of buildings and surrounding space whilst ensuring that amenities are not unduly affected. Design should also minimise opportunities for community conflict, anti-social behaviour and maximise safety for all;
5.	Be economically and socially viable in terms of density, mix, function and location;
6.	Where appropriate ensure equality of access and use for all sectors of the community;
7.	Integration of the development and surrounding green infrastructure, including sustainable drainage and water sensitive urban design;
8.	Achieve a net gain in biodiversity, including tree and hedgerow planting and habitat creation;
9.	Avoid noise and light pollution; and
10.	Promote tenure neutral design, materials and location of affordable housing;
VISUAL APPEAL	
11.	Be uncluttered and attractive; including, where appropriate the removal of unsightly additions when considering the conversion of existing buildings.
12.	Acknowledge local character and develop distinctive character in townscape and landscape terms, using existing landform, features;
13.	Have a clear urban structure and grain that integrates with the surrounding context;
14.	Relate to the surrounding built environment in terms of scale, height and massing;
15.	Make the most of opportunities to restore/ improve key gateways into the Bay and create a focal point

16.	Evolve high quality architectural detail with a distinctive and sensitive palette of materials;
17.	Protect important local and longer-distance views and impact on the skyline, especially from public vantage points, having regard to the location and prominence of the site, and
18.	Integrate with the existing street scene and features (such as trees)
QUALITY OF PUBLIC SPACE	
19.	Positively address the street with active frontages;
20.	Respect existing street frontages and built form;
21.	Ensure definition of space that clearly and coherently defines private and public areas;
22.	Be legible, permeable and accessible to all users;
23.	Provide opportunities for active lifestyles including walking, wheeling and cycling (“Active Design”)
24.	Provide public space and routes that are attractive, safe, uncluttered and work effectively, including a means of storing waste which minimises impact on the street scene;
25.	Positively enhance the built environment;
26.	Avoid creating gated communities;
27.	Incorporation of existing trees and native species, and
28.	Provision of high quality hard and soft landscaping.

Community and Corporate Plan – Pride in Place

Explanation

- 11.2 The design of development has a vital role in the development of place and the evolution of the Bay. Torbay is blessed with a diverse range of historic architectural styles within its towns and some outstanding countryside. Some post-war development has nevertheless

diluted the quality and character of their surroundings. Government guidance requires new development to be of a high standard of design. The council will set out local design codes where appropriate and policies will reflect National Design Codes and guidance.

- 11.3 Good design is not just about the architecture of a building. It is also about the spaces within which the development sits, and the quality of the relationships between the development and surrounding areas. Design and layout should take account of neighbouring buildings, uses and the wider area. The council considers that good design is about making places that are functional, visually appealing, with a high-quality public realm.
- 11.4 The Torbay Design Review Panel (DRP) assesses draft proposals to improve the quality of urban design and architecture through the planning process. The DRP acts as an advisory body, providing professional design advice on key development proposals. While it does not have statutory decision-making powers, its guidance reports will be used as a material planning consideration when applications are taken to the council's Development Management Committee.
- 11.5 Section 17 of the Crime and Disorder Act makes a legal duty for planning to consider crime prevention. Consideration should be given in the location, design, and management of development to preventing crime, disorder, community conflict and antisocial behaviour. Such matters should be addressed in design and access statements. The council will work with the Police Architectural Liaison Officer (ALO) to minimise crime, disorder antisocial behaviour and conflict. Design should seek to promote healthy and active lifestyles. Guidance and principles for development on "Active Design" is available from Sport England and the Healthy Torbay SPD.
- 11.6 To ensure that development proposals meet the requirements of this Policy, a Design and Access Statement should accompany planning applications proportionate to the scale of the proposal. Such statements should provide a site analysis describing how the proposal has evolved, the philosophy behind the proposal, how the proposal responds to its context and how it connects with surrounding areas. They should be updated as the design process evolves.
- 11.7 Development likely to harm (directly or indirectly) existing trees or woodlands will only be permitted where appropriate measures are in place for the retention and management of existing trees and landscape features. The council will seek advance planting where practicable. Appropriate protection measures will include approved management programmes, planning conditions or s106 Planning Obligations, conservation area legislation or tree preservation orders (see also Policy THS).

Under the BHL 12 ‘traffic light’ system, a development proposal will be supported by the council when it secures as many ‘green lights’ as possible. When a development proposal has ‘amber’ and ‘red lights’ scored in the BHL assessment, it should be amended to improve the quality and design of development. Site and scheme specific constraints will be taken into account.

Community and Corporate Plan – Place and Community

Explanation

- 11.8 Torbay Council is committed to the principles of Building for a Healthy Life. It is a standard that can be used by local authorities to assess the design quality of new homes, neighbourhoods, streets and public spaces. The current version, Building for a Healthy Life (2026)), comprises 12 criteria, prompted by questions, which help achieve the delivery of functional, attractive and sustainable places. A well-designed scheme will perform well against all 12 criteria and the performance is determined using a traffic light system of green, amber and red. The assessment supports the delivery of the aspirations of this Local Plan as well as government policy and guidance promoted through the National Planning Policy Framework.
- 11.9 Building for a Healthy Life provides a useful guide for developers on the standards that are expected and what factors are considered when assessing design.
- 11.10 The BHL framework aims to form a collaborative dialogue with the 12 criteria being used at the start of and throughout the development and consultation process. It is important that BHL is considered at the outset of design proposals and should therefore form an integral part of pre-application discussions. The purpose of BHL is to enable a conversation about design in new schemes between local authority and applicant, thereby arriving at a mutually supported result. A properly evidenced, self-assessment of BHL by the applicant will be required alongside a planning application, proportionate to the nature and scale of a proposal. The local authority may also choose to carry out its own assessment of a scheme using BHL criteria and will also take the Design Review Panel's views into account.

Policy DE3: Development amenity and living standards

All development should be designed to provide a good level of amenity for future residents or occupiers and should not unduly impact upon the amenity of neighbouring and surrounding uses, or place unreasonable restrictions on existing businesses and community facilities. This will be assessed using the following criteria:

- i) The impact of noise, nuisance, visual intrusion, overlooking and privacy, light and air pollution;
- ii) Satisfactory provision for off-road motor vehicle parking, secure covered and safe parking for bicycles and electric-bicycles, and storage of containers for waste and recycling;
- iii) Scale and nature of the use, specifically where this would be overbearing, or lead to an over-concentration of similar uses which would harm the amenity of the area;
- iv) Impacts on existing living conditions and standards of accommodation of other uses;
- v) New dwellings should comprise self-contained accommodation with separate access;
- vi) New residential development will need to have particular regard to outlook and light;
- vii) Provision for useable amenity space, including gardens and outdoor amenity areas. Where possible a minimum of 10 sq m for apartments and 55 sq m for houses will be sought. Where individual provision is not possible, communal provision will be sought;
- viii) New homes should be developed at a density which makes good use of land, whilst avoiding town cramming and the loss of open space;
- ix) Adequate floorspace should be provided in residential development to achieve a pleasant and healthy living environment. Regard will be had to the Nationally Described Space Standards; and
- x) Where historic buildings are converted, incongruous later additions should be removed or replaced by more sympathetic additions, and attempts be made to restore the building's original character.

Where necessary, in order to limit the impact of new development, the council may seek to restrict the use of hours of operation, time and volume of deliveries, vehicular access, operation of machinery as well as other measures necessary to preserve amenity.

Community and Corporate Plan – Place and Community

Explanation

- 11.11 The council wishes to ensure that all new homes meet high standards of residential accommodation, both in terms of quality of life for residents, and the creation of liveable, safe neighbourhoods. All applications will be expected to contribute towards making Torbay a better place in which to live.
- 11.12 The council will consider the impact of the development in terms of the noise and disturbance it may generate or be subject to. Developments likely to affect amenity by virtue of noise or disturbance, traffic movements, fumes, dust, vibrations, light, heat and littering on a regular basis or into the evening and night-time will not be considered favourably, unless impacts can be mitigated and will be encouraged to locate away from residential areas to avoid harm.
- 11.13 The Local Plan seeks to achieve a significant increase in town centre living and therefore some homes will be located close to existing business, tourism and commercial uses. Care should be taken to provide users with reasonable level of privacy. The council's starting assumption is that tourism, leisure uses and residential accommodation can coexist in Harbourside and Waterfront, Core Tourism Investment Areas and other key tourism areas. Residents in these areas must expect that there will be a level of bustle and activity including late at night.
- 11.14 Residential developments should be designed to protect privacy in proposed and existing dwellings so that the outlook and quality of space provided will not be compromised. Window alignments should be designed to minimise overlooking other windows or garden areas as far as possible. As a guideline, layouts should seek to avoid directly facing windows less than 21m apart unless obscured, as far as this is consistent with other design principles and the need to make best use of land.
- 11.15 New dwellings should make provision for external amenity/garden space where possible. As well as providing amenity space, gardens can act as a sustainable urban drainage measure, assisting flood risk management and promote biodiversity. The council's greenspace requirements are set out in the Planning Contributions and Affordable

Housing Supplementary Planning Document (2022) and will be updated through the healthy Torbay SPD and Local Design Codes. All dwellings should make provision for the storage of recycling bins/boxes and secure cycle parking (see Policies W1 and TA4). .

- 11.16 New dwellings should be self-contained as far as possible and of a reasonable size. All new homes, whether created by sub-division, redevelopment or new build should therefore provide a good standard of accommodation, having regard to safety, space, amenity, parking and design. Development should meet the government's Nationally Described Space Standard **Technical housing standards – nationally described space standard - GOV.UK** as far as possible. The standards are intended to be operated flexibly, especially when converting historic buildings. 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 SCS).

Table 16

Dwelling Space Standards.					
This table reflects the Nationally Described Space Standard.					
Number of bed-rooms	Number of bed spaces	Minimum GIA (square metres)			Built in storage (sq metres)
		1 storey dwelling	2 storey dwelling	3 storey dwelling	
1b	1p	39 (37*)			1
	2p	50	58		1.5
2b	3p	61	70		2
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3
	6p	99	106	112	

	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4
	8p	125	132	138	
*Where a studio has a shower room instead of a bathroom, the floor area may be reduced from 39 sq. metres to 37 sq. metres, as shown bracketed. The Gross Internal Area of a dwelling is defined as the total floorspace measured between the internal faces of perimeter walls that enclose a dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. GIA should be measured and denoted in square metres.					

The above also applies to shared housing (HMOs) which are also covered by Policy H10. In the case of shared housing, some allowance may be made for communal areas that are available for residents. Regard will be had to creating a mix of accommodation types and sizes. Proposals that result in an over-emphasis of one accommodation type, such as small one-bedroom apartments, are likely to harm the living environment and intensify concentrations of deprivation, and will be resisted (See Policy SCS).

Support will be given to the provision of accessible and adaptable homes that are capable of adaptation to meet the changing needs of residents.

New homes often result from the conversion of existing buildings, many of which are in conservation areas. In such instances the council will seek the removal of incongruous features and, where feasible the restoration of a buildings' original character. Where the removal of such features is argued to make development unviable, the council will require an independent viability assessment and will require appropriate aesthetic improvements to render the development acceptable in design terms.

New dwellings will be expected to strike an appropriate balance between making good use of land, whilst avoiding town cramming or harm to neighbours' amenities. As a general guideline, a minimum density of 40 dwellings per hectare will be sought on greenfield sites. However, in some instances landscape or ecology considerations may dictate lower densities.

Policy DE4: Building heights and urban form

The height of new buildings should be appropriate to the location, character and the setting of the development, whilst having regard to the need to make best use of urban sites.

New development should have regard to the prevailing height (the most commonly occurring height) within the character area in which it is located, unless there are sound urban design or socio-economic benefits to deviate from this approach.

The introduction of new tall buildings above the prevailing height will be supported where they:

- i) Achieve town centre regeneration or other socio-economic benefits. There is an expectation that tall buildings will be acceptable in town centre and harbourside/waterfront regeneration proposals, subject to historic environment and other considerations.**
- ii) Enhance the vitality of an area;**
- iii) Contribute to the regeneration of Torbay;**
- iv) Strengthen the character of the area;**
- v) Are appropriate in terms of their visual impact;**
- vi) Provide wider urban design benefits; and**
- vii) Make a positive addition to the built form, townscape and surrounding landscape.**

Community and Corporate Plan – Pride in Place

Explanation

11.17 Tall buildings will not in themselves achieve Torbay's housing need targets. Regard will be had to the historic environment, street widths and creating liveable spaces. In practice, higher densities can often be achieved through terraced housing and residential blocks

that avoid the need for excessive highway dominated schemes. Nevertheless, Torbay's built form is largely established and constrained by existing development and topography. A great deal of Torbay's built-up area is conservation area or contains listed buildings or other designated heritage assets. The Building Safety Act 2022 introduces additional fire and safety requirements for buildings taller than 18m or 7 storeys (in practice 18m usually equates to buildings of 4 to 5 storeys), including requiring an additional stairwell for residential buildings. Even before these regulations came into force, there had been concerns raised by the development industry about the viability of taller residential buildings in Torbay other than in key waterfront locations.

- 11.18 However, the Local Plan places a great emphasis on urban regeneration, especially in town centres, harbourside and waterfront areas. Given Torbay's shortage of developable land, taller buildings may play a role in helping boost numbers and achieving regeneration. There are areas of the Bay that may be suitable for tall buildings, such as town centres, regeneration areas and transport interchanges where they can support the vitality of these places and emphasise the importance of their role in the character and function of Torbay.
- 11.19 Torbay Council's Building Heights Strategy in 2010 provides guidance on the most appropriate locations for tall buildings and also the appropriate height for building throughout the Bay. This will be updated in the light of new guidance, including the NPPF, Historic England's Tall Buildings Advice Note: **Tall Buildings: Historic England Advice Note 4** and findings of studies such as the Town Centre Regeneration Visions.
- 11.20 The term 'tall buildings' in the Torbay context is defined as buildings that are significantly higher than the prevailing height and/or have a significant impact on the skyline.
- 11.21 Tall buildings can deliver regenerative benefits, contribute to the reuse of brownfield land and reduce development pressure on greenfield sites. If well designed and built in suitable locations, tall buildings can form architectural and visual landmarks, create visually dynamic skylines and help define the area.
- 11.22 The 2010 Strategy identified that Torbay has a number of sensitivities to tall buildings, including conservation areas, special landscape character and prospect views which are important in defining the area's special qualities. In considering building heights, decision makers should balance the need to respect the character and urban form of the surroundings for new development, with the importance of urban regeneration or brownfield urban sites.
- 11.23 Where tall buildings are proposed, supporting evidence should be provided as part of a Design and Access Statement. For tall buildings, additional graphical illustration, and additional material such as 3D modelling and 'fly-throughs' should be provided to help assess their impact.

Policy DE5: Extensions and standalone additions to buildings

Extensions, and standalone additions to buildings will be supported where:

- i) the plot is large enough to accommodate the proposed extension or addition without resulting in a cramped or over-developed site, or the loss of important trees or hedgerows;
- ii) the extension or addition would not dominate or have other adverse effects on the character or appearance of the original property or any neighbouring properties, or on the street scene in general;
- iii) the extension or addition would not cause harm to the amenity of nearby properties, e.g. through overlooking, overbearing impact, loss of light or privacy or water run-off;
- iv) the extension would not result in the loss of parking, including garage space, where no suitable alternative exists to serve the property; and
- v) highway safety would not be impaired.
- vi) All proposals should achieve a net reduction in water run-off to impermeable surfaces and shared sewers.

Community and Corporate Plan – Pride in Place

Explanation

- 11.24 The majority of extensions and additions are relatively small in scale, and many do not require planning permission. However, they can cause problems for adjoining properties due to loss of privacy or overbearing impact.
- 11.25 It is also important that extensions respect the character of the original building and the surrounding area and should therefore be of an appropriate scale or design. Resultant loss of off-street parking provision can also lead to loss of residential amenities for neighbouring properties.
- 11.26 Torbay is a Critical Drainage Area. The effect of urban creep is a major source of run-off into shared sewers and cause of Combined Sewer Outfalls. Cumulative increases in water run-off should be minimised as far as possible, for example by draining storm water into soakaways. The impact of “urban creep” (i.e. building over gardens etc) as identified by the Torbay Hydraulic Modelling of Sewer Capacity in Torbay study (AECOM 2014) and

Water Cycle Study (2025 forthcoming) is identified as having a greater impact on sewer capacity than the effect of new greenfield development. Accordingly measures to minimise surface water running into shared sewers will be sought. This could include permeable surfaces, increased planting, water butts, as well as promoting water efficiency measures in the home. See also Policy ER3 Water Management.

- 11.27 Many house extensions or additions do not require planning permission; in many situations they may be permitted development under the Town and Country Planning General Development Order. However, permitted development rights are complicated and affected by many factors. In some cases normal permitted development rights have been taken away by planning condition or legal agreement. Permitted development rights relate largely to dwelling houses and therefore other types of property, such as flats and commercial properties, require planning permission for many alterations and extensions.
- 11.28 For the above reasons, it is usually advisable to contact the council before any work is undertaken.

Policy DE6: Advertisements

Advertisements will not be permitted where:-

- i) they would harm visual or aural amenity; or**
- ii) they would undermine highway or public safety.**

Community and Corporate Plan – Pride in Place

Explanation

- 11.29 Properly managed and well-designed advertising can add enormously to the colour and vitality of commercial areas, but in the wrong place it can appear out of place and distasteful or even offensive. The land use and visual character of an area are crucial in determining the appropriate level of advertising. Most advertisements appear in the context of buildings and it is important that they fit in with the character of any buildings to which they relate.
- 11.30 Large advertisement hoardings can have a powerful impact on the street scene. The council is concerned to control them carefully to ensure their effect is minimal and not detrimental to the surrounding area. In sensitive situations, hoardings may need to

incorporate other design features to soften their impact. Smaller advertisement signs may be acceptable in appropriate situations subject to the criteria set out in this Policy.

- 11.31 Proposals for hoardings which contribute to the environmental improvement of unsightly sites will be supported in principle on a temporary basis, subject to the criteria set out above and to their removal when the site has been developed.
- 11.32 Applicants should have regard to the location of Areas of Special Control of Advertisements in Torbay.
- 11.33 As part of assessing impacts on amenity and public safety, the Council will have regard to those impacts through the lens of public health and wellbeing. This may include consideration of impacts on children and young people, mental and physical health, cumulative effects, distraction and safety, and impacts on tranquillity and aural amenity.

Chapter 12: Responsible resource use - Waste and Minerals



Figure 23 - Responsible Resource Use

Strategic Policy WS: Waste spatial strategy

Development should minimise the production of waste and increase its reuse and promote the movement of waste up the Waste Hierarchy ; adopting circular economy principles and the proximity principle at all stages of the development cycle

Waste management facilities that can provide an increase recycling, treatment and reprocessing of waste to ensure sufficient capacity exists for the sustainable management of Torbay's waste (including waste water) will be supported. Facilities should promote the movement of waste up the Waste Hierarchy.

Waste management sites should be restored at the earliest opportunity to the highest possible standard to sustainable after-uses that benefit the community economically, socially and environmentally.

Where possible, after-uses should conserve and improve local landscape character and provide opportunities for biodiversity.

Community and Corporate Plan – Creating a Sustainable Future

Explanation

- 12.1 As a Waste Planning Authority (WPA) and Waste Collection Authority (WCA) the council needs to maximise the ‘value’ of resources that we manage from households, in terms of realising the social, environmental and economic opportunities. As a Waste Disposal Authority (WDA) we also need to assess current and future infrastructure operational requirements which will also help to meet the Waste Hierarchy and government targets. As Waste Planning Authority (WPA) we will therefore seek to minimise waste from all development, promote reuse, recycling, and resource efficiency and support waste facilities in sustainable locations.

Policy W1: Waste hierarchy and sustainable waste management

All development should seek to minimise the generation of waste, having regard to the waste hierarchy^[1](adopting circular economy principles and the proximity principle at all stages of the development cycle):

- i) **Prevention:** Using less material in design, manufacture and re-use. Using less hazardous material and other measures to minimise waste generation.
- ii) **Preparing for Reuse:** Checking, cleaning, repairing, refurbishing, whole items or spare parts
- iii) **Recycling** Increase recycling and composting through the kerbside collection regime and ensuring adequate existing recycling facilities in Torbay as well as the improvement or development of new facilities where appropriate. Explore opportunities for storage, re-use and collection facilities. Provision of waste

audit statements demonstrating accordance with the waste hierarchy for major developments.

- iv) **Recovery:** Maximise the recovery of residual waste, through a partnership approach with other Devon Authorities for the use of the site in Plymouth for 'energy from waste recovery'.
- v) **Disposal:** Minimise the amount of residual waste which is disposed of and minimise the exporting of waste for disposal to Devon and beyond.

Development proposals will be expected to provide a scheme of sustainable waste management, proportionate to the scale and nature of the proposal. As a minimum, all developments should make provision for appropriate storage, recycling, treatment and removal of waste likely to be generated. Residential units should be provided with adequate space within the curtilage for waste and accessible kerbside recycling bins and boxes as a site acceptability matter. Planning contributions may be required to enable the provision of additional waste management facilities or equipment where these are needed to support development.

Community and Corporate Plan – Creating a Sustainable Future

Explanation

12.2 The government has introduced legal requirements to drive waste up the hierarchy including the following:

- plans must be in place detailing measures to ensure 65 per cent of municipal waste, including household waste and household like waste from commercial and industrial sources, is recycled by 2035.
- the volume of residual waste per person which is not reused or recycled must be halved by 2042 from 2019 levels.
- by 2050, avoidable waste must be eliminated by recycling or reusing any waste which possibly can be reused or recycled.
- The Separation of Waste (England) Regulations 2025, require for a core set of materials to be collected and managed by local authorities. From March 2027, flexible plastics have to be collected from all households

12.3 The Local Plan therefore seeks to influence/reduce waste arising from all forms of development. In accordance with the Waste Hierarchy, the Plan gives priority to planning for waste management developments that prepare waste for re-use or recycling. All recycling and non-recycling waste for Torbay is managed by SWISCo (a wholly owned

TBC company) at the Waste Transfer Station (approx. 65,000 tonnes per annum). Recycling is sorted and baled or bulked ready for onward transport to facilities. Where possible facilities within Devon are sought, however due to limited availability there is a need for materials to be transported beyond Devon.

12.4 All non-recycling waste, apart from hazardous waste such as asbestos, is transported to the combined heat and power energy from waste facility in Plymouth. This facility was commissioned by the South West Devon Waste Partnership (Devon County Council, Plymouth City Council and Torbay Council), to divert non-recyclable waste away from landfills. In 2025/26 Torbay Council disposed of 34,800 tonnes of household waste at the EFW site in Plymouth.

12.5



Figure 24 - The Waste Hierarchy

^[1] The Waste Hierarchy diagram is a copy of the version in Appendix A National Planning Policy for Waste (2014). The full definition of each level of the waste hierarchy is set out in [Article 3 of the revised Waste Framework Directive \(2008/98/EC\)](#); see also the [Waste Management Plan for England](#).

Policy W2: Waste reduction and waste audit for major and significant waste generating developments

All development should be designed in accordance with circular economy principles to minimise waste generation and maximise reuse and recycling of materials by::

- retaining and repurposing existing structures where feasible;;
- allow for ease of adaptability, redevelopment and refurbishment; and,
- optimise sustainable construction methods which include the use of recycled and recyclable materials and techniques which minimise waste and allow for ease of deconstruction and reuse of building components.

Major development proposals must be supported by a Waste Audit demonstrating how construction, demolition, excavation and operational waste will be minimised and managed in accordance with the waste hierarchy. This should include:

- i) measures to prevent, reuse and recycle waste;
- ii) provision for on-site waste storage and segregation;
- iii) efficient use of materials and reduction of raw material consumption;
- iv) measures to minimise pollution from waste; and
- v) consideration of how the proximity principle has been applied to the management of waste.

Where appropriate, the audit should also consider opportunities to reduce waste transport impacts, including the use of sustainable transport modes where feasible and viable.

The audit should be proportionate to the scale of the proposal, number of visitors and likely waste (including operational waste) generation.

Proposals for waste disposal sites must incorporate a satisfactory scheme for the reclamation of the site to an appropriate after-use, progressively wherever possible, and at the earliest possible opportunity, and progressively during site operation where possible. Adequate contingency measures should be included to manage any systems failures.

All relevant proposals should be accompanied by a recycling and waste management strategy which considers the above matters and demonstrates the ability to meet local authority waste management targets where applicable.

Explanation

- 12.6 Policy W2 requires a Waste Audit to be carried out to assess and manage the impact of major development and uses that can be reasonably expected to generate significant levels of waste. Environment Agency waste permits will also need to be secured where applicable.
- 12.7 The Waste Audit should demonstrate that waste will be minimised as far as possible in both construction and operational phases and managed in an appropriate manner in accordance with the waste hierarchy. The Waste Audit and Five Year Waste Management Plan should include details relating to the minimisation of the use of raw materials, the nature and volumes of waste generated and how waste has been minimised and segregated (i.e. sorting, storage, recovery and recycling facilities). Other measures should also be included to manage waste that cannot be incorporated within the new development, or that arises once it is operational. For residential and commercial development the provision of reduction and/or recycling infrastructure should be identified and support for community composting schemes demonstrated where appropriate. Before granting planning permission, additional waste management measures may also be required to ensure movement up the waste hierarchy. The council's Waste and Resource Strategy refresh will provide opportunities to enhance opportunities for reuse/repair capability.

Strategic Policy W3: Safeguarding waste management facilities

Existing, allocated or permitted waste management sites (for the re-use, recycling and composting, transfer, treatment, recovery or disposal of waste) will be protected unless it can be demonstrated that there is no longer a need for the facility or equivalent or enhanced replacement capacity will be provided prior to the loss of the site. Development proposals within or in the vicinity of (typically within 250m), waste management sites that would prevent or prejudice the use of such sites for those

purposes will not be permitted unless it can be demonstrated that any potential impacts can be effectively mitigated to ensure that the operation of the waste management facility is not adversely affected.

The improvement and expansion of existing waste management facilities will be supported where this would enhance their efficiency, capacity, or environmental performance, including the Torbay Household Waste Recycling Centre (HWRC) and Waste Transfer Station at Yalberton, Paignton. The use of Yalberton Tor Quarry for Construction, Demolition and Engineering Waste, or other waste management purposes, will be protected.

Community and Corporate Plan – Creating a Sustainable Future

Explanation

- 12.8 The Waste Planning Authority must demonstrate sufficient waste management capacity and allocate sufficient provision of waste management sites to meet Torbay's need. A Waste Site Assessment was carried out in 2013, which identified very limited scope for deliverable major new waste management facilities in Torbay.
- 12.9 Waste Collection Authority duties are managed by SWISCo on behalf of Torbay Council in line with the waste hierarchy. Upcoming requirements driven by simpler recycling, Extended Producer Responsibility (EPR), flexible plastics, persistent organic pollutants (POPs), food collections for both household and businesses and other central government directives demand additional space that cannot be accommodated within the existing footprint the Household Waste Recycling Centre (HWRC) at Tor Park Road. Additional expansion land for improved facilities are needed. The continued enhancement of existing waste management sites including the Torbay HWRC and Waste Transfer Station at Yalberton to accommodate additional facilities will be supported, to ensure sufficient capacity to serve Torbay to 2045. The need for enhanced/expanded HWRC is acknowledged and an additional local Household Waste Recycling Centres elsewhere in Torbay during the Plan period will be kept under review. This is a key infrastructure requirement to serve additional Local Plan growth and a stepped growth trajectory should provide for phased improvements. The impact of all operations must be minimised and sites restored where appropriate in accordance with Policy W4. Yalberton Tor Quarry has previously operated as a Construction, Demolition and Engineering Waste (CDEW) facility

in Torbay. It's future use will need to be assessed against the need for continuing as a CDEW facility or as another waste management facility.

- 12.10 It is essential that waste management facilities (whether proposed or existing) are safeguarded from any development proposals in close proximity to them which may prevent or prejudice their operation. This Policy should also be applied to waste management sites with planning permission. The Council's Waste and Resource Strategy refresh will provide opportunities to enhance opportunities to move waste up the Hierarchy including facilities for increasing reuse/repair capability.

Policy W4: Proposals for new waste management facilities

Preference will be given to proposals for (non-hazardous) waste management facilities that are in accordance with the waste hierarchy and located on previously developed land. Individual sites should be well-related to the transport network (including rail and water), to centres of population and sources of waste, and be compatible with neighbouring land uses.

Waste management development will be supported where they would not have an unacceptable impact (including cumulative impact in combination with other existing or permitted development) upon human health, amenity, (including noise levels, odour, air quality, dust, litter, light pollution and vibration) land stability, the quality and quantity of surface waterbodies, groundwater, capacity of existing drainage systems, hydrogeological) and flood risk and features of, environmental (including landscape, historic and geological environment) and biodiversity importance. Policies for the protection of these features are set out elsewhere in the Plan.

Development of facilities for the management of special types of waste (including clinical or hazardous waste) should serve a defined local need and particular consideration will be given to any health, environmental and amenity impacts.

The immediate and wider impact of facilities on the surrounding environment should be minimised through high quality design solutions, with the use of sympathetic materials and colour schemes, and effective methods of landscaping and screening. Specific site management issues should be carefully addressed including amenity, litter, vermin and birds, the impact of odours, lighting, noise, vibration, hours of operation, access and transport movements.

All proposals for waste management facilities must assess the potential for non-HGV transportation of materials to and from the facilities, principally by rail (or water) and take up these sustainable transport opportunities where available. Proposals should

be satisfactory in terms of access where anticipated HGV movements, taking into account cumulative impacts and any mitigation measures proposed (including safety, highway network, air quality). Supporting Transport Statements/Assessments should demonstrate sufficient parking, access, routes, safeguarding of other road users and sustainable transport measures.

Where appropriate, provision for restoration and after use will be required.

Development proposals at, or within 250m of an allocated waste management site that would prevent or prejudice the use of such sites for those purposes will not be permitted unless conflicts can be satisfactorily mitigated.

The use of Yalberton Tor Quarry for Construction, Demolition and Engineering Waste, or other waste management purposes, will be supported.

Community and Corporate Plan – Creating a Sustainable Future

Explanation

- 12.11 Policy W4 sets out criteria for new waste management facilities. Such proposals must safeguard residential and other amenity and minimise impact on the road network.
- 12.12 The Local Plan continues to identify Yalberton and Yalberton Tor Quarry for Waste Management purposes. Most waste management facilities are expected to be in this area. It allows consideration of proposals to support the existing material recycling facility (MRF) including provision for waste and recycling collection vehicles. The Plan also seeks to ensure that Yalberton Road is not sterilised from waste related activities by allowing residential development to encroach too close to it e.g. between Berry Acres and Yalberton Road.

Strategic Policy W5: Waste water disposal and infrastructure capacity

The Council will support the provision, upgrading and expansion of wastewater treatment and sewerage infrastructure where such proposals aim to improve the quality of discharged water or reduce the environmental impact of the operation of the waste water treatment facility.

All development proposals will be required to demonstrate that they can be delivered and operated without giving rise to unacceptable impacts on water treatment and disposal, or deterioration in the service received by residents and businesses. In considering minor development proposals, the council will have regard to the in-combination impact of such developments and their effect on local capacity or flows or adversely affect the integrity of designated sites.

Proposals for housing developments, particularly on new greenfield sites and Future Growth Areas, (having regard to the advice of the relevant statutory bodies) will only be permitted where it can be demonstrated that:

- i) Waste water treatment works or other sewerage infrastructure serving these developments have sufficient capacity to accommodate the additional development, without increasing the risk of overflows of untreated sewage into the environment; or
- ii) There would be no increase in the levels of pollutants or spills (see definition below) likely to have an adverse effect on the integrity of the Lyme Bay and Torbay Marine Special Area of Conservation, due to insufficient capacity within the combined sewer system and/or of treatment works; or
- iii) The proposal would not otherwise increase the risk of overflows of untreated sewage into the environment.

Appropriate measures to reduce the impact of development on the sewerage system, such as natural or sustainable drainage and water conservation measures, will be required, proportionate to the scale and nature of development.

In addition, development of previously developed land must be in accordance with the hierarchy set out in Policy ER2 to ensure that development schemes do not exacerbate sewer flooding and Combined Sewer Outfall (CSO) spills. This will apply in particular, to development that discharges into Hope's Nose CSO in Torquay.

A Health Impact Assessment will be required for new or extended waste water treatment facilities. Existing and permitted waste water infrastructure (including Brokenbury Quarry) will be protected; new development should not compromise their operational efficiency, necessary upgrades or expansion or introduce sensitive uses that could lead to conflict.

Explanation

- 12.13 Waste water treatment facilities are essential infrastructure, necessary to protect human health and water quality.
- 12.14 In exceptional cases, the council will may consider the use of natural sewage treatment methods (including reedbeds) and alongside sustainable drainage measures. This will help meet Water Framework Directive objectives, which the council will ensure are not undermined by development.

Strategic Policy MS: Sustainable minerals strategy

The Council will support a sustainable minerals strategy that:

- i) supports the transition to a low carbon economy, including through increasing the use of secondary and recycled aggregates and reducing reliance on land-won materials where practicable;
- ii) safeguards economically important mineral resources, including building stone, and associated transportation and processing infrastructure from unnecessary sterilisation;
- iii) ensures that mineral development incorporates appropriate measures to adapt to and mitigate climate change;
- iv) protects amenity and minimises adverse environmental impacts;
- v) delivers high-quality restoration and after-use, conserving and enhancing landscape character, historic assets, and geodiversity, including the significance of the UNESCO Geopark; and
- vi) maintains a steady and adequate supply of minerals in accordance with identified needs and the evidence base.

Community and Corporate Plan – Creating a Sustainable Future

Explanation

- 12.15 The spatial vision outlines an ambition for sustainable resource management for minerals development in the plan area. It seeks to manage mineral safeguarding, extraction and possessing according to the principles of sustainable development. Policy GE1 provides the policy context for Geodiversity and the English Riviera UNESCO Global Geopark.

Policy M1: Minerals extraction and environmental safeguards

The process of identifying, appraising, designing and implementing proposals for new or disused sites for minerals extraction will be subject to the following criteria:

- i) The need for the mineral, taking account of aggregate landbanks for the region;
- ii) Likely effects on designated sites of environmental and historic importance, geodiversity or biodiversity (policies GE1, NC1 and HE1 refer);
- iii) The sustainability of the impact on the surface water flow regime and groundwater sources under current and future climate change scenarios;
- iv) Compatibility with surrounding land uses, including historic character and landscapes, and in particular protected landscapes such as National Landscape;
- v) Proximity to local communities and the need to maintain and enhance the local landscape character and setting of settlements;
- vi) Proximity to primary end use markets and ease of access by road or alternative transport modes;
- vii) The ability for a site or sites to deliver significant contributions to habitat creation and priority species as well as geodiversity gains where applicable;
- viii) The provision of Pollution Prevention Plans, including a method statement for management of all potentially polluting activities; and
- ix) There are no unacceptable impacts on human health, noise-sensitive properties and aviation safety; noise, dust and particle emissions or vibrations should be controlled, mitigated or removed at source.

Extensions to existing/disused sites will be given priority over new sites, subject to environmental acceptability. The cumulative effects of activities and sites will also be considered. Proposals for the extraction of building stone that demonstrate a local need for the mineral (such as the repair of heritage assets) will be supported, subject

to the above criteria and other relevant Policy requirements of this Plan. An acceptable programme of progressive working throughout its life, early restoration and after-use must be submitted.

Explanation

- 12.16
- The NPPF requires Mineral Planning Authorities (MPAs) to plan for a steady and adequate supply of aggregates. Torbay Council is meeting this requirement by cooperating in the preparation of a Devon Local Aggregate Assessment with the other Mineral Planning Authorities in the County and Region. As part of this work, it has been established that the potential aggregate resources within Torbay are limited to limestone, for which Devon has a landbank equivalent to 50 years.
- 12.17
- Torbay is adequately served by two existing limestone quarries in South Devon (Stoneycombe at Kingskerswell and Linhay Hill at Ashburton), each of which has sufficient reserves to last beyond the Plan period. Consequently, it is not considered necessary for Torbay to make provision for further land-won aggregate resources in the Plan period.
- 12.18
- Limestone aggregate was available from Yalberton Tor Quarry (previously the only active quarry in Torbay) but this site now has planning approval for the operation of recycling aggregates, at which point its extraction permission was revoked.
- 12.19
- The extraction of building stone within the Devon area is very limited and non-existent in Torbay. Previous quarrying at Berry Head in Brixham has had a large impact on the Head's appearance, and significant quarrying here would conflict with the area's landscape and biodiversity designations. However, the Strategic Stone Study (a Devon-wide study identifying the significant stone types used in the past and their potential current sources) indicates that there is a need for a range of building stone which is not available at present. The protection of locally important building stone is addressed in Policy M2 below. Proposals for extraction would be considered in the context of Policy M1.

Policy M2: Maximising the Use of secondary and recycled aggregates

The council will support developments that promote and maximise the use of secondary and recycled aggregates. Sites for the reception, processing and distribution of secondary and recycled aggregates will be supported, subject to

meeting other Policy requirements of this Plan, near to the source of raw materials in the following locations:

- i) Industrial areas and previously developed land;
- ii) Within existing, proposed or suitable former minerals developments; and
- iii) Co-located with existing or proposed waste management facilities.

Proposals will be assessed against relevant environmental and amenity criteria set out in Policy M1 where applicable to the nature of the development. Development that would prejudice the operation or potential expansion of existing or permitted secondary and recycled aggregate facilities will not be permitted.

Explanation

- 12.20 In order to secure their long-term conservation and make best use of mineral resources, the NPPF states that MPAs should safeguard the potential for the production of secondary and recycled minerals. Producing recycled aggregate helps to reduce demand for primary aggregates. The council will seek to safeguard existing and any proposed minerals recycling facilities, for the reception and processing of construction and demolition wastes. The main source of alternative aggregates arises from construction, demolition and excavated waste (often referred to as CDE waste). Policies W1, W4 also seek to reduce the amount of raw materials in construction, minimise waste production and to maximise the use of secondary and recycled aggregates.
- 12.21 Yalberton Tor Quarry ceased mineral extraction when it gained planning approval for the operation of recycling aggregates the site is currently vacant. Policy TA1 encourages the consideration of alternative modes of transport to move aggregates. The jointly prepared annual Devon-wide Local Aggregate Assessment includes an assessment of all aggregate supply including secondary and recycled sources. Although secondary aggregates (which in Devon are derived from china clay waste and ball clay waste, or potentially incinerator bottom ash) are unlikely to be generated in Torbay, any facility for their processing would be considered in the context of this Policy. Policy NC1 and GE1 may also be relevant for existing or disused quarry sites.

Policy M3: Preserving and safeguarding of limestone resources and key local building stone

The council will seek to safeguard important mineral resources and sites, which may include currently disused quarries. The use of local building stone in new development and for restoration purposes (particularly of heritage assets) will be encouraged. The redevelopment of buildings constructed in local stone should ensure the re-use or salvage of such material. Any non-mineral development proposal on or in the vicinity of an important mineral resource, including a Mineral Safeguarding Area (shown on the Policies Map), will only be permitted where it can demonstrate (through a Mineral Resource Assessment) that it will not cause unnecessary sterilisation or prejudice the future extraction of important minerals or building stone on these sites.

Community and Corporate Plan – Creating a Sustainable Future

Explanation

- 12.22 Minerals are a finite resource. The NPPF requires that proven mineral resources should be protected by designation as Mineral Safeguarding and Mineral Consultation Areas to avoid being needlessly sterilised by non-mineral development.
- 12.23 In order to allow flexibility in demand and ensure long-term supply, Devon County Council (Torbay's neighbouring MPA) has identified the need for safeguarding of aggregate and mineral resources for future generations, some of which lie adjacent to Torbay's boundary. In consultation with Devon County Council and consistent with this approach, Torbay has identified an area of Devonian Limestone as a resource which lies largely in the south of Torbay from the River Dart valley at Galmpton across the northern part of the Brixham Peninsula from Churston to Berry Head. The entire area of Torbay including the marine environment is also covered by the highest level of international recognition through the UNESCO Global Geopark designation. This designation integrates the geology, biodiversity, history, heritage, culture and the communities of the area. Please refer to Policies NC1 and GE1 as mineral sites are also likely to be valued for their geodiversity, wildlife and habitat.
- 12.24 A Mineral Safeguarding Area (MSA) is shown on the Policies Map. Its identification has been based on the known location of the resource (British Geological Survey records) but aligned to field boundaries predominantly in the undeveloped area to prevent unnecessary sterilisation of the mineral resource. The MSA does not state the quality of the resource or presume that the resource will be worked, nor does it preclude all development. However, dependent on the scale and location of any proposed development, a Mineral Resource Assessment may be required of the likely effect on the mineral resource beneath or

adjacent to the development site to demonstrate no unnecessary sterilisation. This assessment may include an assessment of the degree to which the resource exists; the feasibility of extraction (mineral resource is not of economic value or is not viable to extract) or if the mineral resource can be extracted prior to development taking place; and the development would not prejudice the operation or future expansion of existing or permitted mineral sites..

- 12.25 Traditional stone forms a strong element underpinning the character of many of Torbay's individual buildings and conservation areas. The use of local materials, building methods and details helps to enhance local distinctiveness, avoid the carbon footprint of importation and may be a more appropriate for use where traditional architecture and the use of local materials are prevalent Imported stone does not often reflect this local distinctiveness and can detract from the stone in older buildings, harming the character of the area. It is therefore necessary to protect key local stone types both now and in the future, for the ongoing maintenance and restoration of some of our most important historic buildings, the preservation and enhancement of conservation areas and the maintenance of local distinctiveness. It is envisaged that access for small-scale, limited extraction for key local stone (to meet a specific need) may be required, subject to environmental and amenity impact.

Meeting: Cabinet

Date: 21 July 2026

Wards affected: All Wards

Report Title: Torbay Destination Management Plan Review

When does the decision need to be implemented? As soon as possible to launch consultation

Cabinet Member Contact Details: Councillor Jacqueline Thomas, Cabinet Member for Tourism, Culture & Events and Corporate Services, jacqueline.thomas@torbay.gov.uk

Director Contact Details: Alan Denby, Director of Pride in Place, alan.denby@torbay.gov.uk

1. Purpose of Report

- 1.1. The purpose of the report is to update the council on the Destination Management Plan (DMP) review and to seek approval to launch the public consultation.
- 1.2. To ensure Torbay continues to develop, remain competitive, and respond to an evolving marketplace, the DMP has been reviewed and refreshed. It focuses on maximising Torbay's tourism growth potential through a collaborative, place-based and business-led approach, bringing together businesses, communities, and partners to enhance the visitor experience while embedding sustainable and inclusive practices, supporting its aim as the UK's premier coastal destination.
- 1.3. The DMP provides a single strategic framework for the development and management of Torbay as both a visitor destination and a place. It sets out a collaborative blueprint to maximise Torbay's tourism potential requiring active stakeholder involvement to deliver a vibrant visitor economy that benefits residents and visitors alike. While the English Riviera remains Torbay's visitor brand, the refreshed DMP adopts a place-based approach aligned with the Torbay Story and Corporate and Community Plan. It recognises the visitor economy not as a standalone sector but as a catalyst for wider place-based outcomes, including employment and skills, culture, investment, infrastructure development, and community pride and wellbeing.

2. Reason for Proposal and its benefits

- 2.1. The DMP will grow Torbay's visitor economy by celebrating its unique heritage, culture, and natural environment. It will reinforce Torbay's position as the UK's premier coastal destination, while enhancing the visitor experience and fostering pride in place.

- 2.2. The plan sets out a more collaborative, business-led, and place-based approach, underpinned by a clear framework. It recognises the visitor economy as a key economic strength and growth sector, supporting jobs, businesses, and inward investment.
- 2.3. It promotes a more sustainable, inclusive, and year-round visitor economy, strengthening Torbay's overall place offer and improving resilience for residents, visitors, and businesses alike.
- 2.4. The refreshed DMP delivery model strengthens leadership and governance through a place and business-led approach. This includes the creation of a Visitor Economy Cluster to align priorities, maximise resources and delivery, and give the visitor economy a stronger voice in decision-making.
- 2.5. The DMP supports the Council's vision of a healthy, happy, and prosperous Torbay by driving economic growth, supporting local businesses and jobs, and attracting inward investment. It reinforces tourism as a key economic specialism, enabling growth while placing the community, destination, and visitor economy at the heart of a refreshed, evidence-based, and collaborative approach to destination management.
- 2.6. The DMP is also part of the Council's approved Policy Framework and is therefore in accordance with Standing Order F4 – Budget and Policy Framework subject to a consultation period six weeks.

3. Recommendation(s) / Proposed Decision

- 3.1. That Cabinet approves the refreshed Destination Management Plan (DMP) for a minimum 6-week public consultation.

4. Appendices

Appendix 1: Torbay Destination Management Plan

Appendix 2: Torbay Destination Management Plan Review Baseline Report (evidence base)

5. Background Documents

- English Riviera Destination Management Plan (2022-30) - [English Riviera Destination Management Plan - Torbay Council](#)
- Torbay Economic Growth Strategy (2022-30) - [Economic Growth Strategy - Torbay Council](#)
- Economic Strategy Evidence Base - [Economic Strategy Evidence Base - Torbay Council](#)

Supporting Information

6. Introduction

- 6.1. A review of the DMP is complete. The purpose of the review is to ensure that the plan remains relevant, responsive to changing market conditions and is fit for the future in its delivery to support a more resilient, productive, and sustainable growing visitor economy as the UK's premier coastal destination.
- 6.2. The DMP is a strategic policy framework sitting beneath the Torbay Economic Growth Strategy and is led by the Destination Management Group (DMG). Delivered through a partnership approach, DMG members take collective responsibility for setting direction, co-ordinating activity and driving outcomes across the destination. As part of the DMP review the governance management structure has also been reviewed.
- 6.3. The current DMP has delivered tangible outcomes to strengthen Torbay's year-round visitor economy. This includes the development of Geopark Discovery Experiences, growth in business tourism through Meet English Riviera, the creation of the SUP Hub positioning Torbay as the UK home of paddleboarding and securing the 2026 SUP World Cup, revitalised events such as Seafood Feast, strengthened cruise tourism, improved event impact reporting, and effective partnership led business support during the 2024 *Cryptosporidium* outbreak.
- 6.4. The DMP review comes at a pivotal time for stabilising and growing Torbay's visitor economy. With significant place development and investment, it's time to reflect on the current DMP and its approach to ensure the plan will support the destination to develop, unlock new opportunities, and remain competitive in an evolving marketplace.
- 6.5. Torbay's future success will depend not only on its ability to showcase its unique assets, but also on the strength of its foundations. The Torbay Story provides a narrative that celebrates the area's rich cultural heritage, locally distinctive food and drink, the South West Coast Path and internationally recognised Agatha Christie and the English Riviera UNESCO Global Geopark status offer powerful tools for storytelling and attracting new audiences to support year-round tourism.
- 6.6. The refreshed DMP proposes a shift towards a more business-led place-based approach, where businesses play a stronger role in shaping, leading and delivering activity within the priorities. This approach recognises that businesses are best placed to develop sector specific initiatives, build and shape the destination narrative, and respond quickly to market opportunities. The DMP provides the strategic framework within which delivery can thrive, with Torbay Council playing a key enabling role by supporting, coordinating, and feeding into delivery where appropriate, while also strengthening the collective voice of the sector at a strategic level.
- 6.7. Torbay Council plays a vital role in delivering the DMP, providing public services and those place-shaping 'brilliant basics' such as parking, public realm improvements, tackling antisocial behaviour, enabling events, cultural programming, and providing business support. Working collaboratively with place partners, these services are essential to

enhancing the visitor experience, driving footfall, and helping local businesses thrive. By embracing these place-based strengths and focusing on quality, inclusion, and innovation, Torbay can continue to evolve as a vibrant, resilient, and premier coastal destination that benefits both residents and visitors.

- 6.8. Whilst Torbay Council is not solely responsible for delivering the DMP, the review recommends the need for a dedicated role to manage and co-ordinate partnership working and to oversee the effective delivery of the priorities and actions, ensuring the plan's successful implementation and long-term impact.

7. Options under consideration

- 7.1. Continue with the existing DMP, but this is no longer fit for purpose and out of date.
- 7.2. Adopt the refreshed DMP as set out.

8. Financial Opportunities and Implications

- 8.1. The DMP review is complete.
- 8.2. The DMP is a partnership framework to support place and develop Torbay's visitor economy and isn't solely for the council to deliver.
- 8.3. The recommendation of a dedicated role to manage the DMP implementation should be viewed as a prioritisation within the existing Economic Development budget and resources rather than an additional requirement. (This is a similar approach already adopted with other growth sector leads as set out in the Economic Growth Strategy).
- 8.4. The DMP priority most relevant to the Council is Priority 7: 'Destination Ready – Strengthening Infrastructure and Accessibility', which relates to public services, the public realm, town centres, and transport. The Plan proposes developing the action plan with relevant leads and key stakeholders, aligning it with existing service planning. This is likely to involve refining current plans or engaging tourism partners, rather than requiring additional resources or creating significant financial implications.

9. Legal Implications

- 9.1. There are no legal implications with this proposal

10. Engagement and Consultation

- 10.1. Various engagement activities have been undertaken during the development of the DMP review including Destination Management Group and key stakeholder deep dives, online business and stakeholder survey, stakeholder one-to-one interviews and group sessions. These activities enabled wide-ranging input, in-depth discussion of priorities, vision development and identification of stakeholders interested in supporting the ongoing delivery and development of the action plan.
- 10.2. Engagement findings have informed the refreshed DMP, demonstrating strong support for changes to management and governance, and a more business-led approach. Feedback has shaped the Plan by strengthening its focus on sustainability, year-round tourism, and shared ownership. As a result, the DMP better reflects local priorities, has strong business and stakeholder buy-in, and provides a more robust foundation for effective delivery and long-term impact.

11. Procurement Implications

- 11.1. The DMP Review followed a three-quote procurement process inviting local and regional suppliers to submit proposals, aligning to Torbay's commitment to Community Wealth Building. Following this process, Tomorrow's Tourism was appointed to deliver the review and refresh the Destination Management Plan (DMP).
- 11.2. The DMP links to thriving economy in particular the ambition to be the UK's premier coastal destination.

12. Protecting our naturally inspiring Bay and tackling Climate Change

- 12.1. The refreshed DMP is aligned to strategy and activity including the Torbay Climate Partnership, A Greener Way for Our Bay, the English Riviera UNESCO Global Geopark and the assets of our blue and green space within Torbay.
- 12.2. The Plan supports Torbay's sustainability ambitions with sustainability as a key priority, offering the opportunity to think about the approach and actions which will help support Torbay's visitor economy towards becoming more sustainable, environmentally, and economically resilient.

13. Associated Risks

- 13.1. The adoption of the refreshed Destination Management Plan is fundamental in ensuring that Torbay can continue to develop, remain competitive and respond to an evolving marketplace as the UK's premier coastal destination.
- 13.2. The updated Plan focuses on maximising Torbay's tourism potential through a more business-led approach and a new governance structure, strengthening the visitor economy

and Torbay's wider place offer. This supports Torbay's attractiveness as a place to live, work, visit, and invest, contributing to broader economic growth.

DRAFT

14. Equality Impact Assessment

Protected characteristics under the Equality Act and groups with increased vulnerability	Data and insight	Equality considerations (including any adverse impacts)	Mitigation activities	Responsible department and timeframe for implementing mitigation activities
Age Page 439	18% of Torbay residents are aged under 18 years old. 55% of Torbay residents are aged between 18 to 64 years old. 27% of Torbay residents are aged 65 and older - Annual Visitor Survey (2024) suggest that out of 832 (aged over 16+), 46% were 65+, 27% were 55-64, 17% 45-54 and 6% between 25-44.¹	The refreshed DMP takes an inclusive, place-based approach that supports people of all ages. The DMP includes several priorities which look to support residents and visitors such as skills and employment development, to the creation of innovative visitor experiences and products. The focus on accessibility, also looks to support the destination to be inclusive, accessible and welcoming for all. Actions aligned with the priorities will be developed in partnership with businesses and stakeholders.	NA	NA
Carers	At the time of the 2021 census there were 14,900 unpaid carers in Torbay.	The refreshed DMP takes an inclusive, place-based approach that supports the visitor economy and Torbay's wider social and economic wellbeing. By	NA	NA

¹ ERBID (2025) Annual Visitor Survey 2024. Available at [Visitor Survey 2024 | ERBID Company](#). pages 11-14.

	5,185 of these carers provided 50 hours or more of care.	focusing on priorities such as workforce development, business collaboration and improving accessibility, the plan looks to support people from across different backgrounds.		
Care experienced	As of January 2026, there were 277 former care experienced young people aged 18-24 in Torbay.	The refreshed DMP takes an inclusive, place-based approach that supports the visitor economy and Torbay's wider social and economic wellbeing. By focusing on priorities such as workforce development, business collaboration and improving accessibility, the plan looks to support people from across different backgrounds.	NA	NA
Disability	- In the 2021 Census, 23.9% of Torbay residents answered that their day-to-day activities were limited a little or a lot by a physical or mental health condition or illness. - Annual Visitor survey (2024) responses highlighted that 18% considered themselves disabled.¹	The refreshed DMP takes an inclusive, place-based approach that supports the visitor economy and Torbay's wider social and economic wellbeing. One of the key priorities is on accessibility and inclusion, ensuring the destination is inclusive, welcoming and accessible for all. As a key priority (priority 7), accessibility actions will be developed in collaboration with businesses and stakeholders.	NA	NA
Gender reassignment	In the 2021 Census, 0.4% of Torbay's community answered that their gender identity was not the same	The refreshed DMP takes an inclusive, place-based approach that supports the visitor economy and Torbay's wider social and economic wellbeing.	NA	NA

	as their sex registered at birth.	The DMP focuses on a variety of priorities including workforce and skills development, business collaboration, accessibility, and sustainability to support inclusive economic growth for all.		
Marriage and civil partnership	Of those Torbay residents aged 16 and over at the time of 2021 Census, 44.2% of people were married or in a registered civil partnership.	The refreshed DMP takes an inclusive, placed-based approach that supports the visitor economy and Torbay's wider social and economic wellbeing. The DMP focuses on a variety of priorities including workforce and skills development, business collaboration, accessibility, and sustainability to support inclusive economic growth for all.	NA	NA
Pregnancy and maternity	- Between 2013 and 2024, the rate of live births (as a proportion of females aged 15 to 44) has been slightly but significantly higher in Torbay (average of 56.0 per 1,000) than the Southwest (53.4) and broadly in line with England (56.3). - For the period 2022 to 2024, rates in Torbay (44.6) have been significantly below England (50.0).	The refreshed DMP takes an inclusive, placed-based approach that supports the visitor economy and Torbay's wider social and economic wellbeing. The DMP focuses on a variety of priorities including workforce and skills development, business collaboration, accessibility, and sustainability to support inclusive economic growth for all.	NA	NA
Race	In the 2021 Census, 96.1% of Torbay residents described their ethnicity as the following:	The refreshed DMP takes an inclusive, placed-based approach that supports the visitor economy and Torbay's wider social and economic wellbeing.	NA	NA

	• 1.6% as Asian, Asian British or Asian Welsh • 0.3% as Black, Black British, Black Welsh, Caribbean or African • 1.5% as being of Mixed or Multiple ethnic groups • 96.1% as White • 0.4% described their ethnicity another way. • Black, Asian and minoritised ethnic communities are more likely to live in areas of Torbay classified as being amongst the 20% most deprived areas in England. • Annual Visitor Survey (2024) 92% of respondents identified mainly as White British, 3% White Other, 1% Asian/Asian British.¹	The DMP focuses on a variety of priorities including workforce and skills development, business collaboration, accessibility, and sustainability to support inclusive economic growth for all.		
Religion and belief	The 2021 Census showed that the residents in Torbay identify their religion and/or belief as the following; • 48.5% are Christian • 0.4% are Buddhist • 0.2% are Hindu • 0.6% are Muslim • Less than 0.1% are Sikh	The refreshed DMP takes an inclusive, placed-based approach that supports the visitor economy and Torbay's wider social and economic wellbeing. The DMP focuses on a variety of priorities including workforce and skills development, business collaboration, accessibility, and sustainability to support inclusive economic growth for all.	NA	NA

	• 0.1% are Jewish • 0.7% have another religion • 43.2% have no religion • 6.3% did not answer			
Sex	• 51.3% of Torbay's population are female. • 48.7% of Torbay's population are male.	The refreshed DMP takes an inclusive, placed-based approach that supports the visitor economy and Torbay's wider social and economic wellbeing. The DMP focuses on a variety of priorities including workforce and skills development, business collaboration, accessibility, and sustainability to support inclusive economic growth for all.	NA	NA
Sexual orientation	In the 2021 Census, residents described their sexuality as follows; • 89% as Straight or Heterosexual • 1.7% as Gay or Lesbian • 1.1% as Bisexual • 0.1% as Pansexual • 0.1% described their sexuality another way • 7.4% of people didn't answer the question • Annual Visitor Survey (2024) – 91% respondents described themselves heterosexual or straight, 1% as Gay or Lesbian. ¹	The refreshed DMP takes an inclusive, placed-based approach that supports the visitor economy and Torbay's wider social and economic wellbeing. The DMP focuses on a variety of priorities including workforce and skills development, business collaboration, accessibility, and sustainability to support inclusive economic growth for all.	NA	NA
Armed Forces Community	• In 2021, 3.8% of residents in England reported that	The refreshed DMP takes an inclusive, placed-based approach that supports the	NA	NA

	they had previously served in the UK armed forces. In Torbay, 5.9% of the population have previously served in the UK armed forces.	visitor economy and Torbay's wider social and economic wellbeing. The DMP focuses on a variety of priorities including workforce and skills development, business collaboration, accessibility, and sustainability to support inclusive economic growth for all.		
Additional considerations				
Socio-economic impacts (Including impacts on child poverty and deprivation) Page 444	Torbay is ranked as the 39th most deprived upper tier local authority in England in the Index of Multiple Deprivation 2025.	The refreshed DMP takes an inclusive, place-based approach that supports both the visitor economy and Torbay's wider social and economic wellbeing. By focusing on workforce development, business collaboration and improved accessibility, the Plan helps create fairer access to employment, skills, services, and opportunities, supporting people across different ages, abilities, backgrounds, and socio-economic circumstances, while positively contributing to long-term economic resilience.	NA	NA
Public Health impacts (Including impacts on the general health of the population of Torbay)	For the five-year period 2020 to 2024, data shows there is a 6-year life expectancy gap between males who live in Torbay's least and most deprived areas and, a 3-year gap for females.	Providing increased employment opportunities can take households from 'workless' to working. This can provide additional income for families to support a healthier lifestyle. The plan also looks to support the wider place area, improving Torbay's attractiveness as a place to live, work and invest, which could increase civic pride and wellbeing.	NA	NA

Human Rights impacts		The refreshed DMP takes an inclusive, placed-based approach that supports the visitor economy and Torbay's wider social and economic wellbeing. There are no human rights impacts anticipated.	NA	NA
Child Friendly		The refreshed DMP takes an inclusive, place-based approach that supports both the visitor economy and Torbay's wider social and economic wellbeing. Through focusing on improving infrastructure, inclusive place-making, and a focus on quality visitor experiences, the DMP supports Torbay as a place that is welcoming and accessible for children and families.	NA	NA

15. Cumulative Council Impact

- 15.1. None identified. Priorities and suggested recommendations described within the DMP should have a positive cross-council impact allowing for a joined-up approach for delivery.

16. Cumulative Community Impacts

- 16.1. None identified, impacts should be positive.

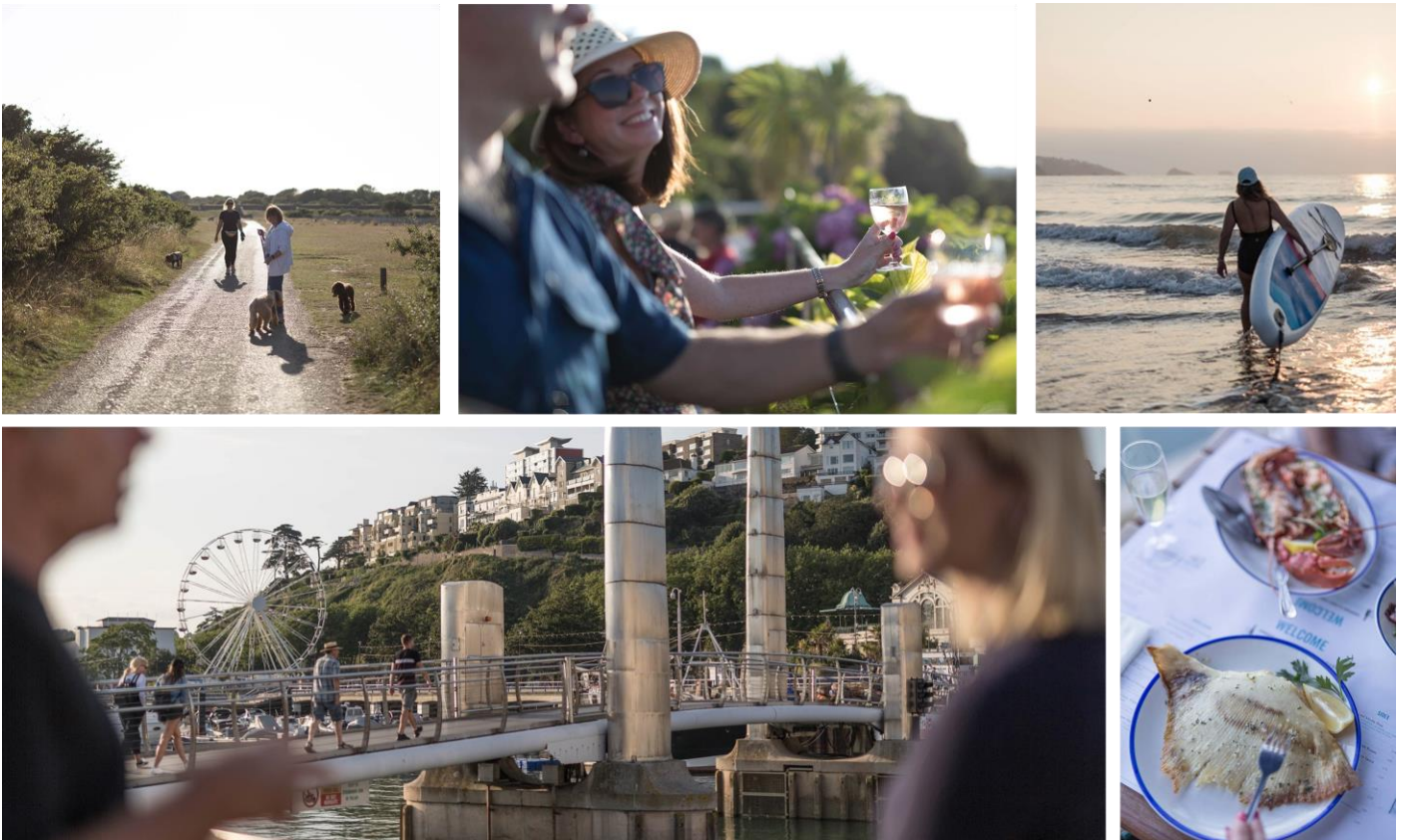


Photo: Collection of images from the Torbay Story

Torbay Destination Management Plan 2026-2036 Draft

Shaping the future of Torbay as a sustainable, vibrant, premier coastal destination.

Experience the beauty, embrace the community, elevate the future.

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1. Introduction

1.1. About the Destination Management Plan (DMP)

The DMP is an invitation to all stakeholders and businesses to work together to strengthen Torbay's visitor economy through collaboration, sustainability, and innovation. It sets out a clear, coordinated approach to achieving this, focusing on sustainable and inclusive growth by improving quality across the visitor economy and supporting businesses and communities to collaborate. Together, this approach can create an inclusive environment that celebrates Torbay's unique heritage and natural beauty, securing its position as the UK's premier coastal destination for generations to come.

The Plan provides a place based framework for Torbay as a destination. It aligns with the Torbay Story and the Council's Corporate and Community Plan, bringing together businesses, partners and stakeholders around a common vision and direction. It recognises the visitor economy as a key sector that supports jobs, businesses, and town centres, while also contributing to wider outcomes such as skills, infrastructure, culture, and community wellbeing.

Tourism plays an important role in shaping how Torbay as a place is experienced by both residents and visitors. The English Riviera will remain the destination brand, providing a strong and consistent identity through which Torbay is promoted.

This Plan sets out long-term priorities to improve quality, support a year-round economy, and attract higher-value visits. It also responds to key challenges, including seasonality, changing visitor expectations, place quality, and workforce pressures.

The DMP is a business-led plan, with delivery shared across businesses and partners. The Council's role is to act as a facilitator, enabler, and convenor, supporting coordinated action rather than leading delivery alone. A structured partnership approach will underpin the Plan, ensuring clear roles, responsibilities, and accountability across stakeholders.

Delivery will be supported through a phased action plan to be co-designed with sector partners, focused on a small number of priority programmes and projects. Progress will be monitored through agreed performance measures, enabling partners to track impact, respond to emerging opportunities and ensure continuous improvement. The DMP will also help to align existing resources and attract further investment into Torbay's visitor economy.

The Plan has been shaped through engagement with stakeholders across the public and private sectors. To make sure the plan is delivered effectively and achieved across the destination, a new

governance structure and framework is needed. Ongoing collaboration will remain central to delivery, supported by regular partnership meetings, targeted workshops, and joint initiatives.

1.2. Vision and Priorities

The DMP aims to support sustainable and inclusive tourism that attracts investment and showcases Torbay as an appealing destination for visitors, residents, and investors.

Vision

To elevate Torbay and the English Riviera into a vibrant, year-round destination that celebrates its unique cultural heritage and stunning natural landscapes, while championing sustainability. We will provide enriching experiences that engage visitors and empower the local industry, fostering a thriving and resilient tourism sector that benefits all.

Priorities

To support the vision's delivery, the DMP sets out seven key priorities:

Priority 1: Driving leadership, governance, and collaboration. Establishing clear roles and responsibilities among all destination stakeholders.

Priority 2: Having a clear narrative – one voice, one vision. Developing a cohesive narrative that brings Torbay's visitor economy together to connect with the aspirations of the Torbay Story, positioning the visitor economy as a key driver.

Priority 3: Making data-powered decisions – unlocking insights for success. Establishing clear Key Performance Indicators (KPIs) to monitor tourism performance and visitor satisfaction. Gathering feedback and providing insights that will help tailor services and marketing strategies effectively.

Priority 4: Elevating visitor experience and innovating products. Focusing on product development and year-round events.

Priority 5: Paving the way for sustainability. Implementing eco-friendly initiatives to protect Torbay's natural assets while promoting sustainable tourism practices among local businesses.

Priority 6: Empowering talent - workforce development and training. Investing in skills development and career pathways to raise aspirations, change perceptions of tourism and hospitality careers. Working with education providers and local businesses to deliver

industry-relevant training that will strengthen workforce skills, improve service quality, support business resilience, and enhance the overall visitor experience.

Priority 7: Destination ready - strengthening infrastructure and accessibility. Prioritising investment in the revitalisation of public spaces, natural assets, and town centres and collaborating with local transport providers to improve connections and strengthen Torbay's welcoming, inclusive and accessible environment.

Overall, this DMP presents a comprehensive strategy to enhance Torbay's tourism landscape, focusing on sustainability, community engagement, and economic growth. By leveraging its unique cultural and natural assets, Torbay aims to strengthen its position as the UK's premier coastal destination that provides enriching experiences for visitors while supporting the local community.

Through coordinated action and partnership working, the Plan will address current challenges and respond to new opportunities within the tourism sector. This approach will support a more resilient, year-round visitor economy that delivers long-term benefits for businesses, residents, and partners.

It also aligns with Torbay's ambition to become a Child-friendly place, recognising the importance of ensuring children and young people feel safe, included and valued within the destination. It also reflects the role of the visitor economy in supporting wider outcomes, including community wellbeing, aspiration, and opportunities for future generations.

The success of this Plan depends on active participation across Torbay's visitor economy. Businesses, partners, and the community all have a role to play in shaping and delivering this approach, whether through investment, collaboration, innovation, or advocacy. This Plan provides a shared framework for action, but its impact will be achieved through collective effort and commitment across the destination.

2. Current Position

This section sets out the position of Torbay's visitor economy in 2026, drawing on data, trends, and stakeholder insights to inform this Plan and its priorities.

Torbay's visitor economy is a key part of the local economy and identity. It supports jobs, businesses, and town centres, contributes to culture and community pride, and helps make Torbay an attractive place to live, work, visit and invest. It also plays an important role in delivering the Council's wider ambitions for inclusive economic growth, thriving communities and improved place quality.

However, the sector is operating within a changing national and regional context. Visitor behaviour is evolving, costs are rising, and competition between destinations is increasing. While Torbay has strong assets and remains a popular destination, performance is uneven and key challenges remain. This highlights the need for a more coordinated, partnership-led, and outcome-focused approach.

2.1. National and Regional context

Across the UK, tourism continues to make a significant contribution to the economy, generating around £147 billion in 2024 (5% of the national economy¹) and supporting over 2.4 million jobs. This includes roles in hospitality, attractions, transport, and retail.⁸ Domestic tourism remains the largest part of the market, but demand for overnight stays has declined in real terms in recent years, reflecting cost-of-living pressures and increased competition from international destinations.

Within the South West, tourism generated £11.1 billion in economic output in 2024 and supported around 194,000 jobs (8% of the UK's tourism jobs).⁸ The region has a strong reliance on domestic visitors and seasonal demand, with three quarters of overnight spend coming from UK visitors. This creates both opportunities and challenges for destinations such as Torbay, particularly in terms of extending the visitor season and increasing value.

To support regional tourism, the Devon and Partners Local Visitor Economy Partnership (LVEP) is set to provide strong leadership and influence, amplifying the voice of the visitor economy at national, regional, and local levels. By collaborating closely with its partners, the LVEP aims to drive policy change, unlock funding opportunities, and make a compelling case for the growth and further development of the visitor economy within the county.

¹ VisitBritain/VisitEngland (2026) Economic Value of Tourism in the United Kingdom, Published 20 January 2026

For Torbay, this context reinforces the importance of strengthening the year-round offer, increasing visitor value, and maintaining competitiveness within a changing market.

2.2. The Value of Tourism: Torbay's current position

Torbay has a well-established visitor economy, supported by its coastline, heritage, cultural assets, and the English Riviera brand. It remains a popular destination for both overnight and day visitors and continues to make a significant contribution to the local economy.

The Volume and Value of Tourism to Torbay

- GDP Contribution: Torbay recorded total tourism spend of £428.8 million in 2024, representing 4% of the region's tourism GDP.²
- Employment: Torbay recorded 5,624 FTE tourism jobs, accounting for approximately 12% of total employment.²
- Domestic Tourism - Overnight Trips: Torbay received a total of 754,000 domestic overnight trips (3.1 million nights) in 2024, spending £230.8 million. With an average spend per trip of £384 and £83 per night in 2023, Torbay ranked among Devon's stronger performing districts. The average length of stay of 4.6 nights was also well above the county average and notably higher than more urban destinations such as Exeter and Plymouth.²
- Domestic Tourism - Day Visits: In Torbay, there were 2.7-million-day visits, representing 4% of the total for the region, and spending £137.9 million.
- International Tourism: Torbay attracted 79,000 inbound trips (547,000 nights), with a total spend of £47 million.²

However, Torbay's visitor economy has followed a mixed and uneven post-pandemic recovery. Visitor numbers rebounded in 2021 and 2022 but have since weakened, remaining below 2019 levels in 2024, indicating that overall volumes have not yet stabilised.³

Total visitor spending recovered to pre-pandemic levels in 2024, although in real terms spending in 2024 was actually still around 20% below 2019 levels. Full-time employment has not mirrored

² The Economic Impact of the Torbay Visitor Economy 2024 Produced on behalf of the English Riviera BID Company by The South West Research Company Ltd October 2025

the recovery, improving modestly in 2021–2022 before declining again in 2023 and 2024, highlighting persistent structural and labour market challenges.³

Overall, the post-pandemic period points to a visitor economy that is generating stronger revenues from fewer visitors, but with ongoing difficulties in sustaining jobs and rebuilding workforce capacity.³ This highlights a shift towards fewer visitors generating greater value, alongside a need to strengthen quality and long-term resilience. However, the sector is undergoing structural change, with increased competition, cost pressures and shifting visitor expectations.

2.3. Changing market conditions

Visitor behaviour is evolving with several key trends shaping future demand:

- Visitors increasingly seek **authentic, local, and experience-led offers**, particularly linked to culture, heritage and food
- There is growing demand for **outdoor, coastal and wellbeing experiences**, aligning with Torbay's strengths
- Visitors are more **cost-conscious**, often choosing shorter stays and looking for value
- Expectations around **sustainability** are increasing, with demand for low-impact travel and responsible destinations
- **Digital tools** and platforms are increasingly shaping how visitors plan and experience trips
- There is an opportunity to **extend the season**, with increased interest in off-peak travel

At the same time, the sector faces wider pressures including rising costs and economic uncertainty impacting visitors and businesses, and workforce shortages and skills gaps continue to impact service quality. Destinations area also aware of increasing climate risks and environmental pressures and the need to adapt to the rapid changes in technology and data. These factors reinforce the need for a more resilient, flexible, and quality-focused visitor economy.

2.4. Strategic Alignment

This Plan aligns with a range of local strategies that support economic growth, regeneration, culture, transport, and climate action. The full list of strategies is set out in appendix 3.

³ Spend data from DMP QR ME Tracker – DMP Review using ONS CPIH inflation index

All strategies emphasise the importance of enhancing the visitor economy through targeted investments, innovative product development, and strong partnerships. These strategies collectively aim to transform Torbay into a vibrant, resilient, and attractive coastal destination that benefits both visitors and the local community. A consistent theme across all strategies is the commitment to sustainability, environmental stewardship, and climate resilience to ensure a high-quality visitor experience. Many highlight the need for collaboration among stakeholders to achieve shared goals and improve the competitiveness of Torbay as a visitor destination.

Strategies stress the importance of community involvement, improving infrastructure, and fostering a sense of place to create a welcoming environment for both residents and visitors. Leveraging Torbay's rich heritage and food culture is seen as vital for attracting diverse audiences and enhancing the overall visitor experience.

Collectively, these strategic initiatives form a comprehensive framework that underscores Torbay's commitment to enhancing its visitor economy while prioritising sustainability, community engagement, and economic growth. By leveraging its unique assets and fostering collaboration among stakeholders, Torbay will firmly position itself as the UK's premier coastal destination that attracts visitors year-round, supports local businesses, and enriches the community.

3. Strengths, Challenges and Opportunities

To understand Torbay's position in 2026, engagement has been carried out with businesses and key stakeholders through one-to-one meetings, workshops, and an online survey. The findings have informed an assessment of strengths, challenges, opportunities, and risks, providing a clear picture of Torbay's current position and future potential. The following sections summarise the key findings from this engagement.

3.1. Strengths, Challenges, Opportunities and Risks

3.1.1. Strengths

Torbay is a well-established UK coastal destination, with around 22,000 bedspaces and a visitor economy that plays an important role in supporting jobs, businesses, and the area's identity. Its key strengths include a high-quality natural environment, with coastline, beaches, the English Riviera UNESCO Global Geopark and the South West Coast Path. Together with a strong cultural and heritage offer, these assets make Torbay an attractive destination for leisure and outdoor activities.

The area also benefits from a recognised tourism identity, a growing programme of events and strong cultural associations, including its connection to Agatha Christie. Accessibility supports visitor access, and recent investment in the public realm is beginning to improve perceptions and create positive momentum.

These strengths provide a solid foundation for future growth. There is an opportunity to build on them by linking the visitor economy more closely with wider priorities such as regeneration, skills, health and wellbeing, and town centre improvement, while ensuring environmental assets are protected.

3.1.2. Challenges

Despite these strengths, they do not always result in a consistent, high-quality visitor experience. Tourism in Torbay remains highly seasonal, which creates fluctuations in demand and pressures on local infrastructure.

There are also ongoing concerns about the condition and visitor perception of town centres, including issues with maintenance and the quality of the retail offer. Investment in infrastructure and attractions has not kept pace with expectations in some areas.

The sector faces workforce challenges, including skills gaps and recruitment difficulties, which can affect service quality. In addition, perceptions of antisocial behaviour and wider place quality issues can influence how the destination is viewed by visitors and investors.

There is also a lack of clarity around Torbay's overall positioning, target audiences, and messaging, which highlights the need for a stronger and more consistent place narrative.

3.1.3. Opportunities

There are clear opportunities to strengthen Torbay's visitor economy through a more joined-up and year-round approach. These include developing higher-value experiences, extending the visitor season and increasing overall visitor spend.

Opportunities also exist to continue investing in regeneration and public realm improvements, expand the events programme, and make better use of Torbay's cultural and heritage assets, including the English Riviera UNESCO Global Geopark and Agatha Christie brand. These can help create a more distinctive and marketable offer.

There is potential to grow business tourism, support workforce development, and provide stronger support for local businesses. Improving transport and connectivity, including walking, cycling and public transport, will also support a more sustainable visitor economy.

More broadly, greater collaboration across organisations will be critical to deliver these opportunities effectively.

3.1.4. Risks

The risks that may affect the performance of the visitor economy include continued seasonality, economic uncertainty, and rising costs, all of which may affect business resilience.

Torbay also faces strong competition from other UK coastal destinations. Perceptions of the area may continue to affect visitor and investor confidence if not addressed.

There are longer-term risks linked to workforce sustainability, environmental pressures, and the need to grow tourism in a way that is sustainable and balanced with community needs.

In addition, improving the use of data and performance monitoring will be important to support better decision-making and maintain confidence among partners.

3.2. Visitor and stakeholder feedback

Feedback from businesses and visitors provides consistent messages about Torbay's strengths and areas for improvement.

Visitors consistently praise Torbay's natural environment, coastline, attractions, and hospitality. The range of activities, value for money and welcoming atmosphere are also seen as positive, making Torbay an attractive destination for both first-time and returning visitors.

At the same time, feedback also identifies concerns about the condition and appearance of town centres, cleanliness, the range of shops and visitor facilities, signage, and transport connectivity. Visitors also note the limited availability of activities outside the main season.

Overall, this shows that while Torbay has strong core assets, these are not always matched by consistent quality across the whole visitor experience.

3.3. Core Challenge and Response

Torbay has a strong foundation as a visitor destination, but the main challenge is delivery.

Evidence and stakeholder feedback show that activity is often fragmented, with unclear roles and responsibilities and limited coordination between organisations.

The DMP addresses this by focusing on a more coordinated and practical approach. This includes prioritising a smaller number of high-impact actions, setting clear ownership and accountability, strengthening partnership working, and improving how progress is monitored.

It also emphasises the need for a clear and consistent place narrative, and for the visitor economy to support wider local priorities, including community wellbeing and quality of life.

3.4. Direction and Strategic Response

The evidence points to a clear direction for the future of Torbay's visitor economy. Success will depend on improving the quality and consistency of the visitor experience, supporting a more balanced year-round and higher-value offer, and strengthening the link between the visitor economy and overall place quality.

It will also require a clearer and more consistent destination narrative, alongside action to address workforce and skills challenges. In addition, there is a need to embed sustainability and accessibility across the visitor offer, and to improve the use of data and insight to support decision-making. Delivering this will require stronger coordination, clearer leadership and more effective partnership working across the sector. Without this, the challenges are likely to continue and limit future growth.

This Plan responds by setting out a clear, long-term framework for a more sustainable, resilient, and inclusive visitor economy. It aligns with the ambitions of the Council's Community and Corporate Plan and wider strategies for economic growth, regeneration, culture, transport, and climate.

This evidence highlights the need for a more coordinated, delivery-focused approach to managing the visitor economy. The following section sets out the priorities and delivery model that will guide this approach.

4. Priorities, Actions & Implementations

This section sets out how the priorities in this Plan will be delivered, including the approach, governance, roles, and responsibilities, and how partners will work together to achieve the outcomes set out in the DMP.

For partners and businesses, this Plan provides a clear route to engagement and delivery. It sets out where collaboration is needed, how activity will be coordinated, and how organisations can contribute within their own roles. This includes participating in action groups, aligning activity with agreed priorities, and supporting the shared ambition for Torbay as a destination.

Delivery will be based on a coordinated, partnership-led model, with the Council acting as a facilitator and enabling collaboration across the destination. A structured approach to governance, delivery planning and performance monitoring will support implementation.

A set of example actions and delivery opportunities has been developed through stakeholder engagement and is included in the supporting appendices. These actions provide practical guidance on how each priority can be delivered and will inform the development of detailed delivery plans. They will be refined and progressed through collaborative partnership working and the Visitor Economy Cluster as part of the implementation phase.

4.1. Strategic Priorities

The DMP is structured around seven priorities, which provide the framework for delivery.

Priority 1: Driving leadership, governance, and collaboration

This priority focuses on strengthening how the visitor economy is coordinated and delivered across Torbay. It aims to improve governance, clarify roles and responsibilities, and ensure that activity across partners is aligned and working towards shared outcomes.

Priority 2: Having a clear narrative – one voice, one vision

This priority focuses on developing a clear and consistent identity for Torbay as a destination. It aims to strengthen how the visitor economy is positioned and communicated, ensuring alignment with the Torbay Story and improving overall perception.

Priority 3: Making data-powered decisions – unlocking insights for success

This priority focuses on improving how data and insight are used to support decision-making and performance management. It aims to strengthen understanding of visitor behaviour, market trends, and destination performance.

Priority 4: Elevating visitor experience and innovating products

This priority focuses on enhancing the overall visitor experience and strengthening the quality and distinctiveness of the destination offer. It aims to support innovation and develop a more diverse, experience-led, and year-round product.

Priority 5: Paving the way for sustainability

This priority focuses on ensuring that the visitor economy develops in a way that is environmentally responsible and inclusive. It supports long-term sustainability while protecting Torbay's natural and cultural assets.

Priority 6: Empowering talent: workforce development and training

This priority focuses on strengthening the workforce and supporting businesses to improve quality and resilience. It aims to ensure that Torbay can deliver high-quality visitor experiences and adapt to changing market conditions.

Priority 7: Destination ready: strengthening infrastructure and accessibility

This priority focuses on ensuring that Torbay has the infrastructure, connectivity and accessibility needed to support a high-quality visitor experience. It aims to improve the overall functionality and attractiveness of the destination.

4.2. Delivery Approach

Delivery of the DMP will be coordinated through a strengthened partnership approach centred on the Visitor Economy Cluster (VEC). The VEC will bring together key partners, businesses, and stakeholders to support collaborative working, shared decision-making, and coordinated delivery across the destination.

The VEC will act as the main forum for setting priorities, reviewing progress, and addressing key issues. Supporting priority action groups will focus on specific themes, enabling delivery of the DMP at a practical level and encouraging wider participation from businesses and stakeholders.

Roles and responsibilities will be clearly defined, with partners contributing through agreed actions and areas of influence. Progress will be monitored regularly to ensure accountability and alignment with the Plan's objectives.

The Council will act as an enabler, supporting delivery by aligning activity across services, facilitating partnership working, and helping to secure investment and resources. This approach represents a shift towards a more proactive, coordinated, and accountable model, with shared responsibility across partners.

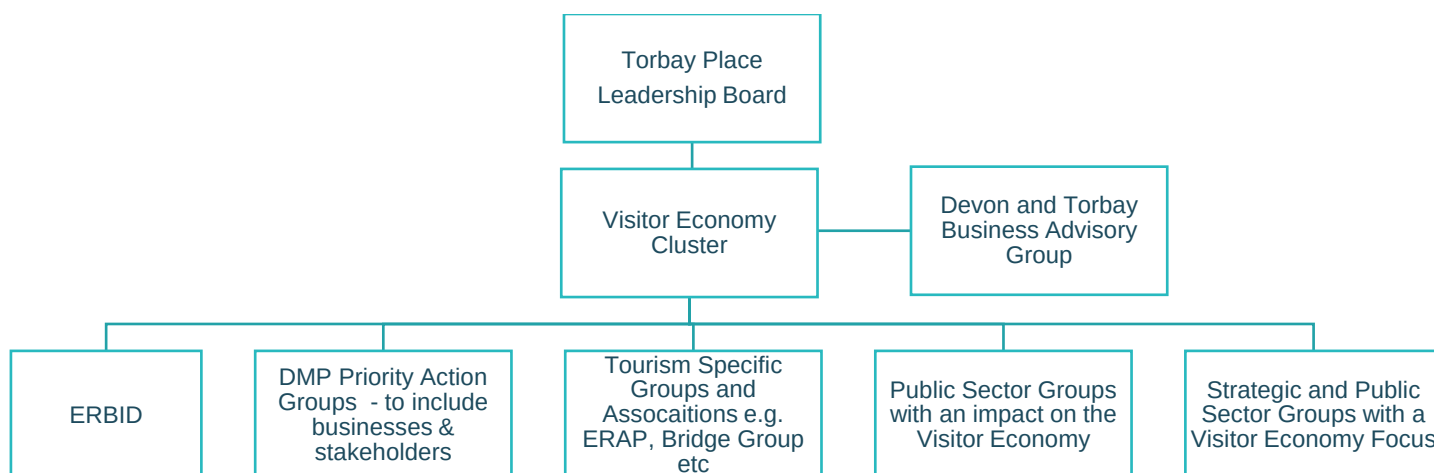


Figure 1: Model to show the delivery approach and partner roles with regards to the VEC.

Delivery of the Plan will be phased over its lifetime, with a focus on short, medium, and long-term actions. Early priorities will focus on strengthening coordination, governance and quick-win improvements, while longer-term delivery will support investment, infrastructure, and transformational change. This phased approach will ensure steady progress while allowing flexibility to respond to changing conditions and opportunities.

4.3. High-Level Actions

At this level, the framework focuses on enabling and guiding delivery rather than setting out detailed or prescriptive actions. Delivery will be supported by aligning Council activity, investment, and strategies with visitor economy priorities, alongside fostering strong collaboration across partners. This includes enabling initiatives that improve destination quality, support sustainability, strengthen the workforce, and encourage year-round activity.

The actions and recommendations set out below and within the appendices provide a practical illustration of how the seven priorities within the DMP can be delivered. They have been informed

by a review of current activity and shaped through engagement with businesses, stakeholders, and partners via workshops, consultations, and one-to-one discussions.

These actions are not intended to be fixed or exhaustive. Instead, they represent examples to guide delivery and will inform the development of more detailed plans for each priority area. These plans will be led by partnership groups and supported by the Visitor Economy Cluster (VEC).

As delivery progresses, there will be ongoing opportunities for businesses and partners to contribute ideas, align existing activity, and identify new areas for collaboration. Delivering the priorities will require sustained partnership working, clear leadership, and appropriate resourcing. The Council will play an enabling role, but delivery will be shared across the wider destination.

Priority 1: Driving leadership, governance, and collaboration

- Bring experienced local business leaders and diverse stakeholders together to form a Visitor Economy Cluster. This new cluster will advocate for change and co-ordinate stakeholder efforts in tourism development; it will also provide guidance and oversight for the DMP.
- Use the DMP as a practical framework to align tourism initiatives with regeneration and planning efforts, ensuring clarity on all organisation's contributions.
- Identify dedicated staffing and resources within Torbay Council to support implementation of the DMP and facilitate collaboration among partners.
- Create clear tools and guidance to help businesses engage with the DMP and delivery including actionable steps linked to each priority.
- Partner with key stakeholders, including the Devon and Cornwall Police and local housing providers, to align on community safety and homelessness initiatives.
- Actively engage local businesses in the DMP through joint events and collaborative marketing initiatives. Improve communication among stakeholders regarding ongoing delivery, projects, available support, and collaborative marketing efforts.
- Inspire a culture of innovation among Torbay businesses and tourism operators to adopt new approaches and enhance the visitor experience.
- Investigate the feasibility of a distinct Retail BID to secure funding for enhancing the local offer and services.

Priority 2: Clear narrative – one voice, one vision

- Better connect the visitor economy and its importance within the Torbay Story to reflect its importance as a key driver.
- Use Torbay's USPs and identity as a destination filled with history, creativity, culture, and community spirit and underpinned this with a narrative around quality authentic experiences, community values, and aspirations.
- Create a proactive communications strategy aimed at countering negative and promoting positive stories about Torbay (whilst acknowledging and addressing negative feedback).
- Use successful initiatives that highlight community strengths and success stories from local businesses and community initiatives to build a positive narrative around Torbay.
- Target outreach programmes to connect with younger demographics to gather insights about their perceptions of Torbay.

Priority 3: Data-powered decisions – unlocking insights for success

- Leverage available datasets to gather insights on visitor demographics and interests to guide targeted marketing and product development.
- Create protocols for data sharing among stakeholders to ensure transparency and effectiveness.
- Design consultation approaches that are sensitive to the current pressures faced by local businesses, such as virtual meetings, surveys, or small focus groups that respect their time constraints. Streamline the process of conducting surveys to prevent businesses being overwhelmed and to ensure higher response rates.
- Define and agree key performance indicators (KPIs) to measure the success of tourism initiatives and marketing efforts.
- Use data analytics to create detailed visitor profiles that identify key demographics, interests, and spending patterns, enabling more targeted marketing efforts, and gather insights from visitors and stakeholders about their experiences and suggestions for improvement
- Perform comprehensive assessments of major events to determine their economic impact on the local economy. This should include visitor numbers, spending patterns, and feedback from local businesses.

Priority 4: Elevating visitor experience and innovating products

- Encourage a mindset shift among stakeholders from traditional tourism models to innovative, value-driven approaches that prioritise quality experiences over quantity.
- Encourage businesses to innovate and adapt their tourism offer to meet changing market demands and visitor preferences. Organise networking events or 'product innovation labs' for local businesses to connect and collaborate on tourism initiatives and ideas.
- Create unique, themed experiences centred around Torbay's cultural, active, outdoor, and natural attractions: the English Riviera UNESCO Global Geopark, and Agatha Christie as the flagship brand, (like Shakespeare's position in Stratford-upon-Avon's marketing and branding).
- Diversify the visitor base, particularly developing strategies, and products to attract a younger audience and maximise the Visiting Friends and Relatives (VFR) market.
- Develop a strategy for co-ordinating events across Torbay to ensure a vibrant atmosphere and avoid scheduling conflicts; and increase the variety and frequency of events throughout the year.
- Create tangible visitor products and experiences which businesses can easily get on board with including local food/drink offers, events and digital tools.
- Develop a comprehensive strategy and sustainable model to grow business tourism that includes clear goals, responsibilities, and expected outcomes.
- Create experiences that are inclusive, accessible and appealing to children, young people and families, alongside ensuring that the visitor offer reflects the needs of a diverse range of users throughout the year.

Priority 5: Paving the way for sustainability

- Encourage local businesses to adopt sustainable tourism practices and community engagement initiatives such as improving resource efficiency, local sourcing and encouraging visitors to use public transport, walk or cycle.
- Ensure that attractions and public areas are fully accessible to all visitors.
- Ensure the DMP governance includes measures to oversee the integration of environmental protection measures into tourism development and develop sustainable travel initiatives.

- Promote local produce, cuisine and craft, strengthening local supply chains and collaborative links between the visitor economy and local producers and suppliers.

Priority 6: Empowering talent: workforce development and training

- Actively work to change the perception of careers in tourism and hospitality as low-skilled or seasonal jobs and to inspire the next generation into choosing the sector as an informed career choice.
- Use current and future skills funding to develop courses and training for the sector, building upon previous courses and experience (such as the use of modular training); and include Work Experience, Apprenticeships, Adult Skills Fund or Skills Bootcamps.
- Encourage businesses to attend events such as career days at schools to showcase opportunities in the visitor economy.
- Encourage greater involvement from Torbay businesses in tourism initiatives and workforce development. Establish mentorship programmes that connect experienced professionals with young people entering the tourism workforce. Involve young people in the planning and implementation of workforce development initiatives.
- Focus on quality assurance measures and implement training programmes to improve service levels and product knowledge and develop initiatives to support local tourism and hospitality businesses with enhancing their offer and visibility.
- Develop business support that provide resources, training, or financial assistance to help local businesses adapt to changing market conditions and enhance their offer.

Priority 7: Destination ready: strengthening infrastructure and accessibility

- Establish ongoing assessments of the DMP and approach to support the visitor economy in adapting to changing demands.
- Invest in infrastructure upgrades, such as updated and improved signage, to enhance visitor experiences and community satisfaction and safety, and focus on enhancing the visual appeal, functionality and accessibility of entry points to Torbay.
- Ensure that additional public and private funding opportunities to sustain regeneration efforts beyond initial public funding phases remain high on the agenda. Particularly programmes for medium-sized and larger investors to develop mixed-use properties and hotels.

- Collaborate with local transport providers to strengthen services, including evening services and better connections to attractions, will enhance accessibility for visitors.
- Ensure that public spaces, transport and infrastructure are safe, inclusive and accessible for children and young people, supporting a destination that works well for residents as well as visitors.
- Continue to invest in the improvement and maintenance of public spaces, including natural assets and town centres to enhance the overall visitor experience ensuring these spaces are inclusive and accessible for all. Address the condition and infrastructure of existing bedspaces and visitor facilities.
- Position planning, heritage, and regeneration as enablers of sustainable growth, supporting delivery, and ensuring development that reinforces Torbay's identity, while protecting its distinctive townscapes, seafront character, and historic and natural assets.
- Promote sustainable transport options by encouraging walking, cycling and public transport as primary ways to explore Torbay, supported by a joined-up, user-friendly, and accessible network that includes safe cycling routes, e-bike hubs, improved connectivity across the Bay, and enhanced direct links to key attractions and destinations.
- Integrate tourism with town centre development plans with homelessness initiatives where it impacts on the visitor economy. This could include visible policing and community safety, proactive place-making to improve public spaces. However, it is understood that social services and community organisations are working to address the root causes of homelessness and substance abuse.

4.4. Outcomes and Measures

The DMP is expected to deliver a number of long-term outcomes aligned with Torbay's Community and Corporate Plan. These include a stronger and more resilient visitor economy, improved quality of place and visitor experience, increased year-round activity, higher-value visitor spend, and stronger connections with wider priorities such as regeneration, transport, culture, and skills. It also includes understanding and improving the experiences of children and young people within Torbay's visitor economy and the wider place, as part of a broader focus on inclusion, accessibility and community wellbeing.

Progress will be measured through a defined set of indicators covering key areas such as visitor numbers and value, visitor satisfaction, destination quality, sustainability, workforce development,

and business engagement. These indicators will support regular monitoring, reporting and continuous improvement.

Performance will be reviewed through the delivery framework, with updates provided through partnership structures including the Visitor Economy Cluster and wider governance groups. An annual report will summarise progress, achievements, and areas for improvement.

Full details of indicators, targets and reporting arrangements are set out in the supporting appendices.

4.4.1. Strategic Goals

Delivering the objectives of the DMP will require coordinated action across a range of organisations, businesses, and stakeholders. The following strategic goals set out the key areas of focus to support delivery:

- **Foster collaboration among stakeholders** by creating a more coordinated and joined-up approach to tourism planning and delivery.
- **Increase local business participation** in visitor economy initiatives and partnerships over the lifetime of the Plan.
- **Strengthen community involvement** to support greater local engagement, understanding and shared benefits.
- **Grow business tourism activity**, particularly during shoulder and off-peak periods.
- **Promote environmental awareness** by encouraging responsible visitor behaviour and sustainable practices.

4.4.2. Strategic Growth Indicators

The following indicators will be used to monitor progress over the lifetime of the Plan:

1. Visitor Growth Indicators

- Increase in total value of staying visitors (annual and monthly figures reported in real terms)
- Length of Stay – in days (working against the current baseline)⁴

⁴ The average length of stay provides a useful indication of the types of visitors coming to Torbay; e.g., shorter stays suggest more short breaks, longer stays reflect traditional holiday markets, helping to guide product development.

2. Visitor Satisfaction Survey Indicators

- Improve the *Overall Impression* score to 4.5 over the Plan period.
- Improve visitor perception of *the cleanliness of the streets* to 4.25 over the Plan period ⁵
- Net Promoter Score (NPS): to evaluate how likely visitors are to recommend Torbay to others. *Move baseline to 70 over the period of the Plan (Staying Visitors)*

3. Sustainability Indicators

- Consider sign up to the GDS Index or find an alternative, to track progress against a range of measures and against peer group. (Tracks the broader progression against a range of sustainability measures that will be relevant for Torbay and enables benchmarking against similar destinations)

4. Business Community Engagement Indicators

- Local business participation: Measure the percentage of local businesses engaged in tourism initiatives and partnerships, aiming for increased participation over time⁶.
- Recognising the economic value of events to Torbay, aim to identify, scope, and assess a range of potential events that can be agreed by the VEC and taken forward from Year 2 of the Plan

5. Infrastructure and Accessibility Indicators

- The VEC to publish an annual review of the progress that Torbay is making to deliver improvement to the destination and drive growth in its visitor economy.
- Increase the satisfaction of quality of public transport services to reach 4.5

6. Cultural and Heritage Engagement Indicators

- From year 2, ensure that all major events ⁷are tracked in terms of participation and economic impact. Encourage the strategically important visitor attractions to track visitor numbers, act collectively to drive up service quality and add further value to the overall offer.

⁵ These are perception driven based on visitor feedback from the Annual Visitor Survey.

⁶ To be agreed by the VEC and priority groups.

⁷ List to be agreed by the VEC.

7. Economic Impact Indicators

- Calculate the current value of Business Tourism to Torbay and aim to grow it above the Devon trend growth rate during the Plan period.

8. Strategic Alignment Indicators

- Measure the number of stakeholders involved in DMP initiatives and aim for a year-on-year increase in participation over the Plan period.

9. Training and Workforce Development Indicators

- Track the number of tourism and hospitality related training and development programmes available for the regional workforce aiming for an increase over the Plan period.

Appendix 1: Evidence Base and Context

This appendix and accompanying Torbay Destination Management Plan Review Evidence Base, provides the supporting evidence base for the DMP. It brings together local visitor economy data, place-based insight, stakeholder engagement, and wider national and regional trends that inform the priorities and approach set out in the main document.

It is intended to support the framework and should be read alongside the main document, rather than as part of the core policy text.

National value of Tourism

Across the UK, tourism continues to make a significant contribution to economic activity and employment with a GDP contribution in 2024 of £147 billion (5% of the national economy⁸). The tourism industry supported over 2.4 million jobs in the UK in 2024, making it one of the largest employment sectors.⁸

In 2024, 4.6 million visitors came to the UK from abroad, spending £32.5 billion in local economies.⁸ In comparison, there were 1.2 billion domestic visits, comprised of 108 million overnight stays and 1-billion-day trips, spending £89 billion in the UK economy.⁸ Domestic Tourism (domestic overnight stays and day trips) is responsible for over half of total tourism spending in the UK. However, domestic overnight spend has been falling in recent years.

Since 2022, domestic overnight spending has fallen 9% in real terms (after inflation) to reach £33 billion in 2024. This decline reflects a weakening in demand for overnight travel within the UK, potentially driven by cost-of-living pressures, and increased competition from international destinations. Despite this drop, overnight stays still represent 20% of total tourism expenditure in the UK.⁸

Value of Tourism for the South West

Tourism GDP for the South West region totalled £11.1bn in 2024. The number of jobs supported by tourism in the South West was 194,000, 8% of the UK's tourism jobs.⁸

The South West received 2.4 million international visits in 2024 (5.5% of UK share), generating £1.5 billion in spend.⁹ In terms of domestic tourism, the South West recorded 15.4 million

⁸ VisitBritain/VisitEngland (2026) Economic Value of Tourism in the United Kingdom, Published 20 January 2026

⁹ Office for National Statistics (2024) International Passenger Survey

overnight trips (13% of the UK share), spending £4.5 million. Three quarters of all overnight tourism spend in the South West came from domestic visitors in 2024, compared to one quarter for London. Over 90-million-day visits were recorded in the South West, representing 10% UK share of day visits and 9% of spend.¹⁰

Key Visitor Economy Facts for Devon (2024)

- £2.6 billion annual visitor spend
- Supporting over 47,138 jobs (35,661 FTEs), 8% of total employment
- 21.3 million staying visitor nights (international and domestic)
- 22.5-million-day visits annually, generating £1.1 billion in spend.¹¹

The Devon and Partners Local Visitor Economy Partnership (LVEP) is set to provide strong leadership and influence, amplifying the voice of the visitor economy at national, regional, and local levels. By collaborating closely with its partners, the LVEP aims to drive policy change, unlock funding opportunities, and make a compelling case for the growth and further development of the visitor economy within the county.

¹⁰ VisitBritain/VisitEngland (2024) Great Britain Tourism Survey (GB Day Visitor Annual Report 2024)

¹¹ The Economic Impact of the Torbay Visitor Economy 2024. Produced on behalf of the English Riviera BID Company by The South West Research Company Ltd, October 2025

Appendix 2: Trends in the Evolving Landscape of Tourism

The tourism landscape in England is undergoing significant change, underscoring the importance of adaptability and sustainability in responding to the evolving preferences of visitors. Visitors are increasingly seeking authentic local experiences, outdoor and wellness activities, and value-driven holidays, while also showing greater awareness of environmental impact. Coastal destinations like Torbay are well-positioned to capitalise on these trends by offering unique, experience-rich stays that cater to both domestic and international visitors.¹²

- **Authentic and Local Experiences:** Visitors increasingly want to experience ‘places like a local,’ seeking connection with local culture, people and everyday life, not just iconic sites; a trend that can help destinations like Torbay showcase local food, fishing heritage, coastal walks, and small-town life. Younger visitors especially prioritise travel and unique experiences over material spending, which supports investment in curated experiences, local culture, and adventure activities.
- **Health and Well-being Tourism:** Day visits that incorporate wellness experiences have shown a continuous upward trend from 2022 to 2024. In fact, these visits reported the highest average spend per person, reaching £124 in 2024 compared to £52 for a typical day visit. This correlation illustrates the growing interest in experiences that promote physical and mental well-being, further influencing travel choices. The short-stay rental market is also closely tied to this trend, offering accommodation that cater to those seeking relaxation and rejuvenation during their travels.
- **Active and Outdoor Travel:** Following a boost (Covid-19 legacy), walking, cycling, and nature-based holidays remain popular. Interest in camping, caravanning and especially glamping remains high as a budget-friendly and ‘close-to-nature’ holiday style.
- **Cost-Conscious Travel:** Many UK visitors are planning to spend less on holidays and look for value offerings (e.g., package deals, combined accommodation, and activities) due to inflation and continued cost-of-living pressures, an issue which is increasing rather than diminishing.

¹² Sources for Trends section: VisitBritain; Mintel

- **Sustainability:** Eco-conscious planning (e.g. choosing lower impact activities and transport) and scepticism about green washing means destinations with genuine sustainable practices (e.g., electric charging, conservation) will resonate with a growing segment of visitors.
- **Artificial Intelligence:** AI and digital tools for travel planning is increasingly popular, particularly among younger visitors aged 25-34 who are highly engaged with AI-based recommendations. There is a growing demand for customised itineraries and flexible booking options, allowing visitors to tailor their experiences to their preferences.
- **Seasonal Travel Shifts:** There's emphasis on promoting travel outside peak summer months when crowds are thinner and prices softer, useful for coastal destinations with shoulder-season appeal.
- **Domestic Demand and Staycations:** UK residents continue to take domestic holidays, partly due to cost pressures, convenience, and global impacts. Coastal and countryside areas benefit strongly from this trend.
- **Inbound Market Growth:** International visits and spending in the UK are forecast to grow. Growth among key markets (especially the US and parts of Europe) suggests opportunity for coastal destinations appealing to long-haul and regional visitors.

The National Challenge

Recent global economic and political uncertainty continues to affect visitor confidence and spending. Changes to international travel regulations, visa requirements and trade agreements, alongside ongoing currency fluctuations, risk increasing costs for overseas visitors. At the same time, rising inflation and the cost-of-living crisis have reduced domestic disposable income, contributing to shorter stays, increased price sensitivity and fluctuating visitor spend across the year.

National policy changes are placing additional pressure on tourism businesses. Increases to employer National Insurance Contributions and the National Minimum Wage from April 2025 have had a disproportionate impact on sectors such as hotels, restaurants, and bars, which rely heavily on entry-level and seasonal staff. Common mitigation measures include reducing investment, limiting staffing levels or increasing prices to customers, all of which can affect service quality and business viability.

Pressures linked to seasonality, particularly during school holidays and major events mean effective visitor flow management, promotion of off-peak travel and dispersal to lesser-visited areas are increasingly important to protect the visitor experience and resident wellbeing.

Environmental sustainability remains a critical consideration. Climate change is already affecting seasonality, with warmer temperatures potentially extending the traditional summer season, while also increasing the risk of extreme weather events that disrupt outdoor activities and coastal environments. Continued collaboration between stakeholders is therefore essential to minimise impacts on natural assets, marine environment, and local communities, while supporting a transition to more sustainable tourism practices.

Finally, as technology evolves, the tourism sector must continue to embrace digital transformation. Improving online booking and information systems, using data analytics to better understand visitor behaviour, and expanding contactless and digital services will help businesses remain competitive, enhance the visitor experience and support more targeted, sustainable destination management.

Appendix 3: Strategic Alignment

This framework supports the Council's wider place-shaping role by aligning the visitor economy with broader priorities for economic growth, regeneration, culture, transport, climate response, and community wellbeing. It recognises the visitor economy not as a standalone sector, but as a key driver of place, supporting investment, skills, town centres, and quality of life.

Across national, regional, and local strategies, there is a consistent emphasis on the importance of a strong and coordinated visitor economy. These strategies highlight the need for sustainable and inclusive growth, improved infrastructure, high-quality visitor experiences, and stronger collaboration between partners. There is also a clear focus on maximising the value of heritage, culture, and natural assets, alongside developing a coherent place narrative that strengthens Torbay's identity and appeal.

The DMP aligns with a range of key strategies and policy frameworks that together provide a joined-up approach to place and destination management:

- **Community and Corporate Plan (2023–2043):** Supports place quality, inclusive growth, stronger communities, and long-term resilience.
- **Economic Growth Strategy (2022–2030):** Positions the visitor economy as a key driver of prosperity, investment, skills, and business growth.
- **Torbay Story:** Provides a unified place narrative and identity to support marketing, engagement, and investment.
- **English Riviera Destination Management Plan (2022–2030):** Establishes foundations for higher-value, year-round tourism and informs the refreshed approach.
- **ERBID Business Plan (2022–2027):** Supports destination marketing, product development and partnership working across the visitor economy.
- **Torbay Inclusion Strategy (2025–30):** Embeds equality, diversity, and inclusion across Council activity, supporting accessible places, services, and opportunities for all residents and visitors.

The DMP also aligns with a range of thematic strategies which strengthen the visitor offer and support wider place outcomes:

- **Culture, heritage, and events strategies:** Enhance the cultural offer, heritage assets and year-round events, supporting visitor experience and local identity.
- **Torbay Food Strategy (2025–2030):** Strengthens the local food offer as a key part of the visitor experience and local economy.
- **Geopark Management Plan (2023–2033):** Protects and promotes Torbay’s natural assets and global status as a UNESCO Global Geopark.
- **Outdoor Events Strategy (2021–2027):** Supports the development of a high-quality events programme to extend the visitor season.

In addition, the framework aligns with key spatial and environmental policies:

- **Local Plan:** Provides the statutory framework for land use, supporting tourism development, regeneration, and investment, including Core Tourism Investment Areas.
- **Climate and environmental strategies:** Support sustainable tourism, carbon reduction, and the protection of natural assets, including through initiatives such as *A Greener Way for Our Bay*.
- **Transport and accessibility priorities:** Support improved connectivity, active travel, and access to enhance both visitor and resident experience.

Collectively, these strategies emphasise the need for strong partnership working and shared ownership, investment in infrastructure, public realm, and destination quality with a focus on sustainability, resilience, and climate responsibility. They highlight the need for improved data, insight and performance monitoring with a clear and consistent place narrative that unites the destination and the sector.

Overall, this alignment ensures that the Destination Management Plan is fully integrated with wider Council priorities and partner activity. It provides a coordinated framework to maximise the contribution of the visitor economy to Torbay’s long-term economic, social, and environmental ambitions, supporting its position as a high-quality, year-round coastal destination.

Appendix 4: Delivery, Governance and Monitoring Framework

The Destination Management Plan (DMP) is supported by a delivery and governance approach that translates the strategic framework into coordinated action. Delivery will be underpinned by a live action plan, clear partnership arrangements, and a structured approach to monitoring and reporting progress.

The detailed delivery plan will sit beneath the framework and will be maintained as a live document. It will translate the DMP's priorities into specific actions, identifying lead organisations, timescales, and review arrangements. The Plan is based on seven core priorities, which together aim to transform Torbay's visitor economy into a high-quality, year-round, and sustainable offer.

These priorities focus on strengthening leadership and collaboration, developing a clear and consistent place narrative, improving the use of data and insight, enhancing visitor experience and product development, embedding sustainability, supporting workforce development, and improving infrastructure and accessibility. Example actions have been developed through stakeholder engagement and will be refined through partnership working as part of the delivery process.

Delivery of the DMP will be based on a shared ownership model. While Torbay Council will provide strategic leadership and act as a facilitator and enabler, delivery will be led collectively by businesses, partners and stakeholders working within their own roles and areas of influence. This approach reflects the need for a more coordinated and collaborative model, ensuring that responsibilities are clear and that activity across the destination is aligned.

A key part of this approach is the establishment of the **Visitor Economy Cluster (VEC)**, a business-led partnership bringing together representative stakeholders across the visitor economy. The VEC will oversee the delivery of the DMP, coordinate activity, share insight and provide a unified voice for the sector. The Chair of the VEC will represent the visitor economy within wider governance structures, including the Place Leadership Board and the Devon and Torbay Business Advisory Group, ensuring alignment with broader economic and place-based priorities.

To support delivery, a series of **priority action groups** will be established, each focused on one of the DMP's key priorities. These groups will bring together businesses, stakeholders and delivery partners to co-design and implement actions. This approach will encourage collective ownership, improve coordination, and ensure that delivery is responsive to changing needs and opportunities.

The DMP will begin its delivery phase with an action planning session, bringing together key stakeholders and businesses to agree priorities, actions, and responsibilities. From this, a structured programme of delivery will be developed, supported by regular communication, engagement and partnership working across the destination.

Performance monitoring will be an integral part of the framework. Progress will be measured through a set of proportionate indicators linked to the DMP's objectives, including visitor activity and value, destination quality, business engagement, sustainability, and workforce development. These measures will be reviewed through the delivery plan and updated as required to reflect changing priorities.

Regular monitoring and reporting will support oversight and accountability. Action groups will meet periodically to review progress, address challenges, and update delivery activity. An annual report will be produced summarising achievements, challenges, and outcomes across each priority area. This will be reported through governance structures, including the Place Leadership Board, to ensure transparency, alignment and continued strategic oversight.

Overall, this delivery, governance and monitoring framework provides a structured and collaborative approach to implementing the DMP. It ensures that the strategic ambitions of the Plan are supported by clear actions, strong partnerships, and effective performance management, enabling Torbay to deliver a more coordinated, resilient, and high-quality visitor economy.

Appendix 5: Engagement and Consultation Summary

Engagement with businesses, stakeholders and partners was carried out to inform the development of this framework. This included one-to-one discussions, workshops, and an online survey, alongside feedback gathered from businesses on visitor experiences.

This engagement provided valuable insight into how the visitor economy is experienced in practice and identified key themes relating to perception, delivery, and future priorities.

Overall, feedback reinforced the importance of the visitor economy to Torbay, particularly in supporting local businesses, jobs, and the wider identity of the area. Businesses and stakeholders highlighted strong levels of pride in Torbay's natural environment, cultural assets, and tourism offer. However, engagement also identified a clear gap between these strengths and how they are consistently experienced or perceived.

Visitor feedback gathered through businesses and surveys highlighted a number of recurring themes. Positive feedback consistently focused on Torbay's coastline, scenery, attractions, and welcoming hospitality, with many visitors valuing the range of activities, affordability, and overall environment.

However, feedback also identified challenges in relation to the quality and consistency of the visitor experience. Key issues raised included:

- The condition and appearance of town centres and public spaces
- Perceptions of cleanliness and maintenance
- Concerns around antisocial behaviour and safety
- Limitations in retail, dining and wider visitor offer
- A need for improved signage, information, and transport
- A lack of year-round and family-friendly activities

From a business and stakeholder perspective, engagement highlighted a number of structural and delivery challenges. These included:

- A perception of fragmented governance and unclear leadership

- Limited coordination across organisations and initiatives
- Duplication of activity across multiple groups and plans
- A lack of clarity on roles, responsibilities, and ownership
- Challenges in accessing support, funding, and resources

Stakeholders consistently identified that the main barrier to progress was not a lack of ideas or opportunity, but the need for a more coordinated and effective approach to delivery.

The engagement process also identified a strong appetite for change. Businesses and partners supported a more collaborative, business-led model, with clearer leadership, improved communication, and a stronger shared vision for the destination. There was particular support for:

- A more coordinated approach to events and marketing
- Greater investment in place quality and visitor experience
- Strengthened use of data and insight
- Improved support for skills and workforce development
- A clearer and more consistent destination narrative

These findings have directly informed the approach set out in the DMP, including the focus on partnership working, clearer governance structures, and a more proactive, delivery-led model.

Appendix 6: Glossary and Definitions

For the purpose of this framework, the following terms are used in a broad and practical way.

- **Visitor economy:** The wider economic and social impacts linked to visitors, including tourism, hospitality, culture, and leisure.
- **Destination quality:** The overall quality of the place and visitor experience, including public spaces, services, accessibility, and perception of the area.
- **Year-round economy:** Activity that supports visitor demand across the whole year, reducing reliance on peak seasons.
- **Sustainable and inclusive growth:** Growth that protects assets, benefits communities and minimises negative environmental and social impacts.
- **Destination Management Plan (DMP):** A strategic framework setting out the vision, priorities, and delivery approach for Torbay as a destination and place.
- **Place-based approach:** A joined-up approach that considers economic, social, environmental, and cultural factors together.
- **Visitor Economy Cluster (VEC):** A business-led partnership coordinating delivery and collaboration across the visitor economy.
- **Visitor experience:** The overall quality of a visitor's journey, including attractions, services, infrastructure, and customer service.
- **Public realm:** Publicly accessible spaces such as streets, seafronts and town centres that shape the visitor experience.
- **Key Performance Indicators (KPIs):** Measures used to track progress, including visitor satisfaction, value, and engagement.

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Torbay Destination Management Plan Review BASELINE REPORT

Evidence Base

5th February 2026

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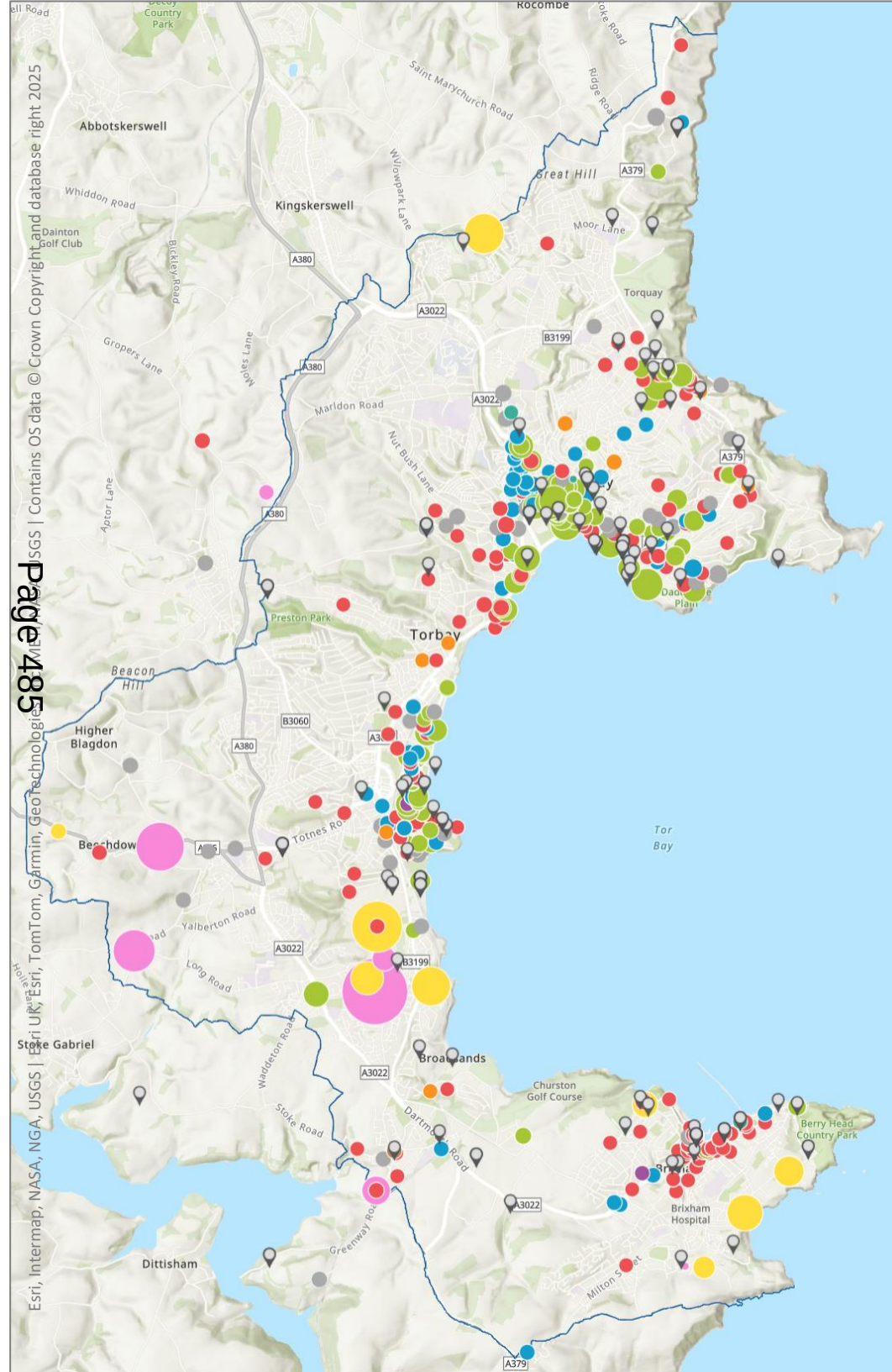
Notes:

- 1. Study Area – Torbay Unitary Authority
- 2. Data Sources: The data underpinning this review has been gathered from a range of sources and where secondary, those sources are given.
- 3. Image Sources: Maps and figures are Tomorrow’s Tourism Ltd, with sources referenced where applicable. Images are licenced from Shutterstock
- 4. This document is best viewed on a high resolution 27” monitor. When printed the document is A3 in size and is printed on Cocoon recycled paper. The polypropylene front cover is recyclable.
- 5. This document is an interim report prepared on behalf of Torbay Council. Tomorrow’s Tourism Ltd. will not be liable for any indirect or consequential loss or damage as a result of reliance on any of the insight set out in this document.

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Introduction & Approach

Map 1 – Distribution of Visitor Accommodation and Visitor Attractions in Torbay



1. This Baseline Report sets out the current state of play for the visitor economy in Torbay, drawing on a wide range of different sources and datasets to provide a snapshot of current performance and future potential.
2. The Report is part of the Discovery Stage relating to the development of a new Destination Management Plan for Torbay. Related work also includes an online survey for businesses and stakeholders, workshops and a number of in-depth interviews with key stakeholders. The development of the new Destination Management Plan will draw views from a wide range of partners and stakeholders to reflect a broad consensus and both elements of work can provide a firm foundations to build on for a successful future.
3. A variety of implications / findings are added in boxes in each Section and these key messages they are repeated as a Summary on the next page.

Outlook for 2026

4. Macroeconomic forecasts see a lack of UK private sector growth, with businesses weighed down by relatively high taxation, higher than average staff costs, high energy costs and a cautious visitor who typically has much less disposable income. Consumer confidence lags long-term norms with the GKF Index at -17 in November 2025, tracking at around this level over the two years since January 2024 and likely to continue throughout 2026 at this level. The unemployment rate is also likely to drift higher over the next year.
5. Inflation is likely to reduce slowly, but will remain above the 2% Bank of England target throughout 2026. Two or three reductions in interest rates are likely to see base rate falls to 3% by the end of 2026. This may help to unlock inward investment for those priority projects set out in the Torbay Story.
6. Running a business in the tourism economy in Torbay is likely to become less profitable in 2026 with increases in business rates for many from April, higher employment costs through the National Minimum Wage increases along with the decreased NICs threshold which has had a proportionately more severe effect on businesses that have lower paid or part-time staff. Funding for necessary investment by the public sector, such as on skills and training, may also be difficult to find given other statutory priorities.
7. Meanwhile, consumers will continue to watch their expenditure, which could mean shorter length of stay; replacing staying visits with day visits; or reducing expenditure while on holiday, for example by having fewer meals out, or opting for self-catering instead of serviced accommodation.

Implications for Torbay

- The challenging economic context will colour the first two years of any new Plan and should be taken account in the actions initially prioritised.

Summary and Key Findings

1. The visitor economy is likely to be subject to wider macro-economic headwinds and a low growth environment over the next two to three years. Increasing the quality of Torbay's overall offer, developing and working with strategically important visitor attractions as well as continuing to reshape and revitalise the accommodation offer, give Torbay a route to greater long-term profitability.
2. Measures that focus on converting current day visitors to become longer staying and repeat visitors can help transform the economic fortunes of Torbay. A focus on attracting more visitors from overseas can also reap dividends as is reported in Section 1.3 below.
3. The leisure market presents opportunities but it may be helpful to focus on no more than three specific markets over the next three years. It will be helpful to weigh the opportunity costs of focusing on inbound tourism against domestic markets.
4. The opportunity cost of prioritising business tourism should also be examined. Some potential exists for growth in meetings and conferences for Devon, but has Torbay got the right product or location to realise the potential?
5. Torbay should consider diversifying beyond peak-season leisure demand, capitalising on strong volumes relating to *Visting Friends & Relatives* for year-round demand. The growing 65+ demographic offers opportunities for traditional activities, while fewer visitors with children may weaken school-holiday demand. Long stays from study travel may boost shoulder and off-season demand; there is an unmet demand for dog-friendly accommodation.
6. When considering the accommodation offer, the long-term decline in accommodation stock seen across this century may now have reached its baseline. While there is still likely to be some accommodation that is not aligned to market needs, there is an opportunity to continue to reshape the offer through planning policy and to prioritise public resources to facilitate and encourage new hotel investment.
7. The current DMP is being delivered successfully but the actions have not moved the dial in the way that will promote change and growth. Part of this is the unhelpful economic context, some of it is likely to be about inadequate resources, another issue may be the way in which the partners should best organise themselves to drive change and progress a complex and multi-layered policy area.
8. Given some slippage over recent years, improving visitor satisfaction and quality, particularly regarding cleanliness, safety, public realm, and legal compliance, should be raised up the agenda.
9. Developing in-house expertise in tourism statistics can help to turn data from the Data Hub into useful insight. Current statistics may underrepresent the situation; the DMP can also acknowledge the scale of the Sharing Economy and involve these operators in future planning and development.
10. Preparing for upcoming policy changes, in particular the Statutory Registration Scheme and potential visitor levies via the Devon & Torbay Combined County Authority, can both be strategic game-changers for Torbay.
11. The Destination Management Group (DMG) should consider the prioritisation of product development activity over the next 2 to 3 years. Successful events, like the Bay of Lights, highlight the importance of extending the tourism season; a study to identify two or three new events is recommended.
12. Enhancing the range and quality of visitor experiences could be a growth option, as offerings are less developed compared to other destinations. Consider working with the strategically important visitor attractions to develop the Geopark-related offer.
13. Diversify and support the accommodation sector by promoting high-quality standards, sustainable practices and off-season usage. Continue converting older stock to residential use; consider increasing bedspace reduction targets to better manage accommodation supply. A targeted programme to support high-aspiration accommodation providers could drive growth and quality.
14. Extending the tourist season will help create year-round jobs and strong collaborations with educational institutions will be central to address workforce challenges.
15. The DMG might consider assigning visitor economy actions to specific groups, such as those focused on resort quality or sustainability. Establishing a new system of governance will help drive the delivery of specific initiatives that link product development with targeted marketing campaigns to maximise benefits. Focussing on a few actions is likely to be more effective than spreading efforts too thinly.



Shutterstock (2025) Agatha Christie Statue, The Strand, Torquay, #2643825401

1. Visitor Economy Performance & Market Context

1.1 Visitor Volumes, Value & Impact – Domestic

2006-2019

Figure 1. Volume - Overnight Trips (000)

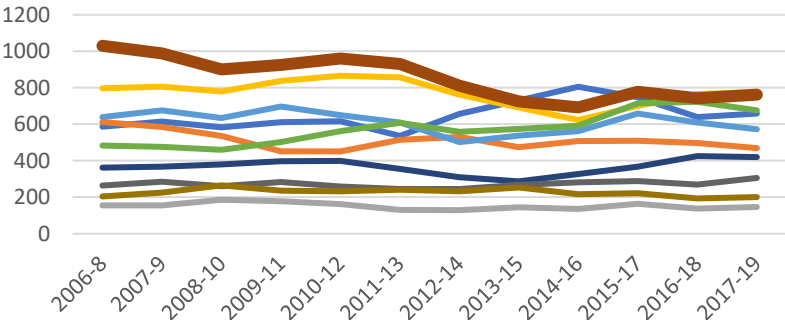


Figure 2. Nights (m)

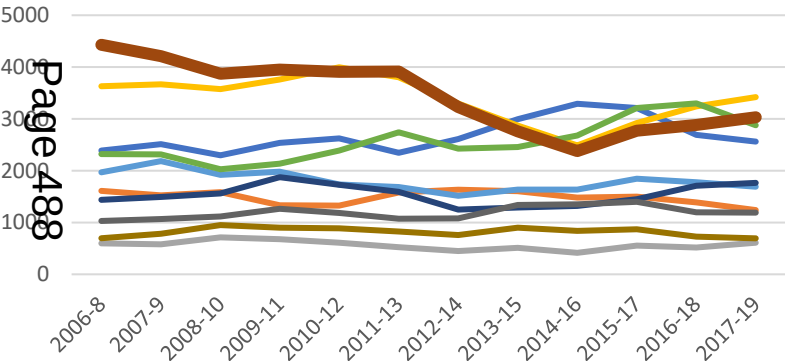
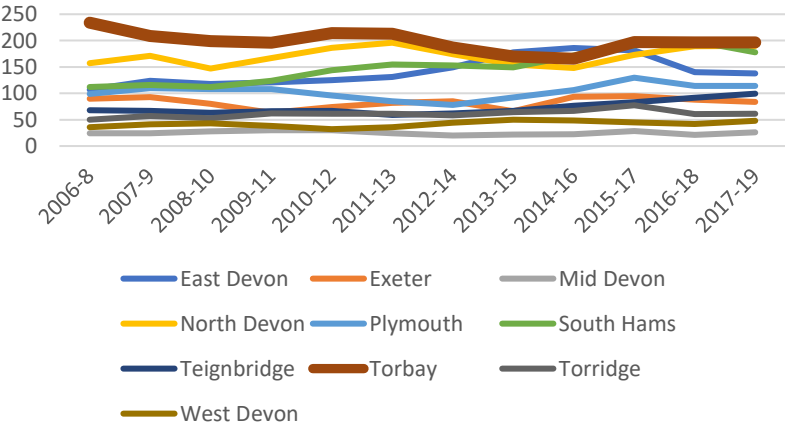


Figure 3. Overnight Spend (£m)



2021-2023 Annual Average

Figure 4. Volume (m)

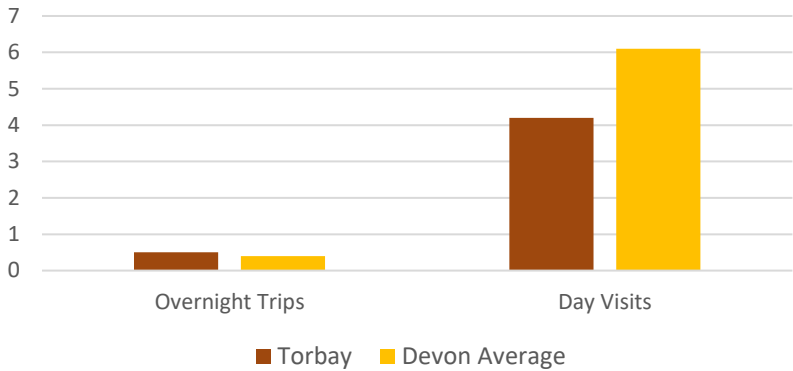


Figure 5. Nights (m)

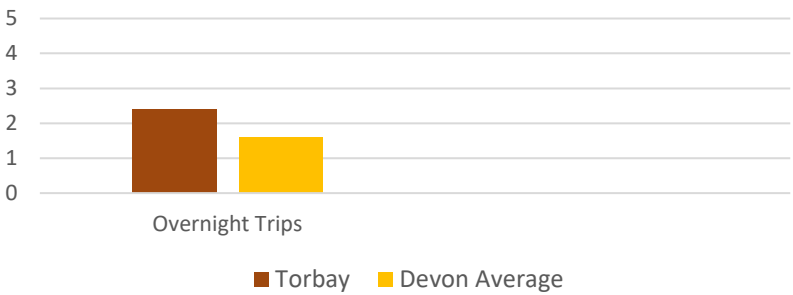
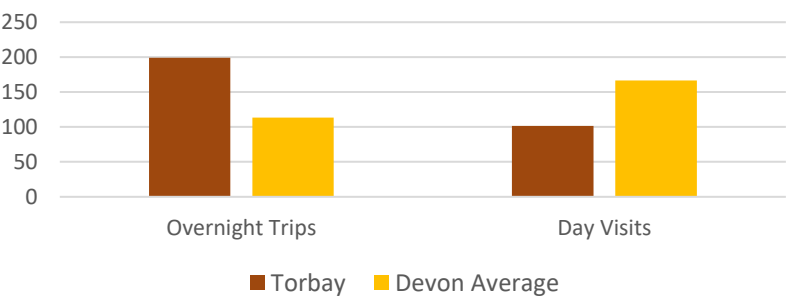


Figure 6. Spend (£m)



1. Torbay plays a major role in Devon’s domestic tourism economy, outperforming the average of the other Devon districts (“Devon Average”) across all core indicators of trips, nights and spend. While overnight visitors continue to deliver higher economic impact overall, day visits remain a vital component of Torbay’s total visitor spend and footfall.

Pre-pandemic trends (2006–2019)

2. Torbay consistently recorded significantly higher visitor volumes, nights and spend than the Devon average. Over this period, trips gradually declined from just over 1 million in 2006 to around 0.75–0.8 million by 2019, with similar patterns observed in nights and spend. Despite this, Torbay maintained a clear lead over the Devon average throughout.^{1,2}

Post-pandemic performance (2021–2023)

3. Torbay attracted around 1 million domestic trips between April 2021 and March 2023, compared with a Devon district average of 0.7 million. 4.8 million visitor nights were recorded in Torbay, well above the Devon district average of 3.1 million, highlighting Torbay’s continued strength as a longer-stay destination.³

4. Domestic overnight spend totalled £398 million over the 24-month period, significantly higher than the Devon district average of £277 million.

Day Visits

5. Torbay recorded 8.3 million day visits, which is below the Devon district average of 12.3 million, reflecting the county’s larger rural catchment and wider dispersal of trips. However, day visitors to Torbay generated a substantial £203 million in spend, underlining the importance of the day visitor market to the local economy, even though this remains lower than the Devon average of £333 million.³

1. Source: Visit England, GBTS 2006-2019.
2. Source: Visit England, GBTS 2021-2023. Due to small sample sizes and a shorter data collection period following COVID-19, this dataset was displayed as 24 months worth of data (Apr 2021 - Mar 2023). The charts are displayed as annual averages to provide easier read-across from the pre-COVID charts.
3. Notes on data: Due to changes in the data processing approach, the 2021-23 data is not directly comparable to previous data. Please note that all 2014-2016 averages have been calculated from original data and no re-weighting has taken place. Spend graph is not in real terms so inflation has gradually pushed up amounts. It is important to note that figures up to 2019 are not directly comparable with those from 2021 onwards due to changes in survey methodology and a lack of data for 2020–2021. The two periods should therefore be interpreted as separate time series.

1.1 Visitor Volumes, Value & Impact – Domestic

Torbay vs other Devon Districts

1. With an average spend per trip of £384 and £83 per night, Torbay ranks among Devon’s stronger performing districts. The average length of stay of 4.6 nights is above the county average and notably higher than more urban destinations such as Exeter and Plymouth.
2. Spend per day visit (£24.42) sits below the Devon average (£27.15) and ranks seventh out of the eight districts listed in Table 1. This indicates that while successful in attracting visitors, Torbay is not currently maximising the economic return from each trip.
3. The data highlights a strategic imperative to shift focus from purely driving visitor numbers towards increasing the value of each visit.

Devon

1. Overnight trips generated 3.8m visits, delivering £1.19bn and 12.5m bed nights, highlighting their central role in overall visitor value. ⁵
2. Holiday trips dominate the overnight market, accounting for nearly half of trips (1.8m) but over half of spend (£639.7m) and bed nights (7.1m), underlining their higher economic yield and longer stays.
3. Visiting friends and relatives (VFR) represents a significant secondary segment (1.2m trips; £242.2m), contributing meaningful volume but lower spend per trip than holidays.
4. Business tourism is minimal at 2% of trips and 1% of value (0.1m trips; £14.7m), confirming Devon’s limited reliance on corporate tourism. Domestic stays as part of outbound travel and miscellaneous trips are smaller but together add over £296m, indicating some diversification beyond core leisure demand.
5. Day visits are high volume (21.3m) and deliver substantial value (£1.09bn), almost matching overnight spend. This underlines the importance of short-stay and local/regional visitors to Devon’s economy, though with lower spend per visit compared to overnight stays.
6. The data reinforces Devon’s strong dependence on leisure-led tourism, particularly holidays and day visits, with clear opportunities to focus on extending stays, converting day visits into overnight trips, and increasing spend within the VFR market.

Implications for Torbay

- The opportunity cost of activity relating to Business Tourism should be considered as the market is relatively small and the Torbay product may not be as competitive as other Devon destinations
- The leisure market is broad based and extensive and more work to understand and prioritise key growth segments is likely to be important for future success.

Figure 7. Volume (m) of Visits to Devon 2024

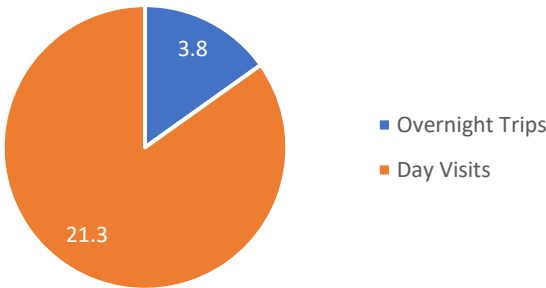


Figure 8. Value (£m) of Visits to Devon 2024

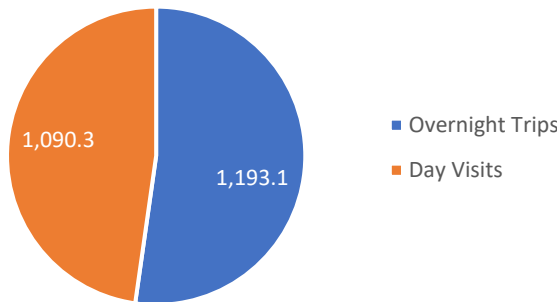


Figure 9. Domestic Overnight Trips by Purpose to Devon 2024

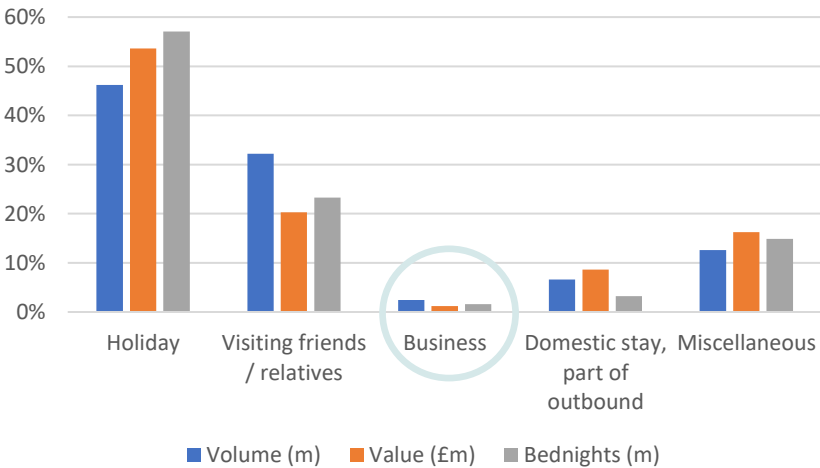


Table 1. Domestic Overnight and Day Visits by District 2021-2023¹

District	Spend per Night	Spend per Trip	Average Nights	Spend per Day Visit
East Devon	£64	£282	4.4	£24.11
Exeter	£54	£162	3.0	£31.68
Mid Devon	£77	£251	3.3	-
North Devon	£56	£314	5.6	£26.12
Plymouth	£86	£255	3.0	£27.97
South Hams	£76	£302	4.0	£35.53
Teignbridge	£56	£217	3.8	£19.24
Torbay	£83	£384	4.6	£24.42
West Devon	£83	£383	4.6	£34.04

1. Source: Visit England, GBTS.
2. Note from VE: Due to small base sizes by local authority, the tables include 24 months worth of data (Apr 2021 - Mar 2023).
3. Source: GBDVS 3HR+¹ (3 hour+ Leisure Day Visits, the broadest definition of leisure day visits)
4. Torridge has been omitted from the table due to insufficient base size. Mid Devon Day visit data has been omitted for the same reason.
5. Source: GBTS 2024, <https://www.visitbritain.org/research-insights/domestic-tourism-latest-results#view-and-analyse-data>

1.2 Visitor Volumes, Value & Impact – Visitor Origin

South West Visitor Economy Hub

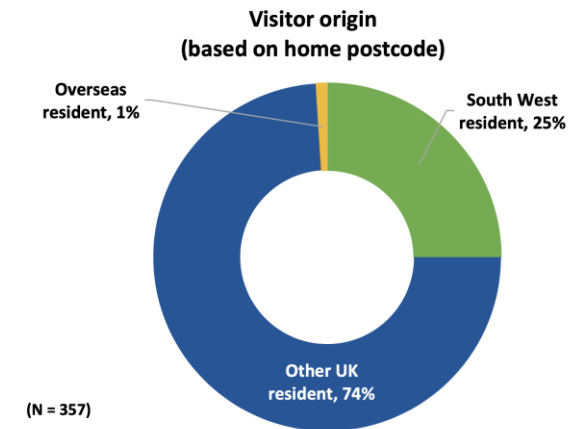
- 1. The South West Visitor Economy Hub report for Q3 2025 highlights the West Midlands as the largest share of visitors to the English Riviera outside the South West region at 25%. The South East and East Midlands also provide a significant source of visitors. These markets are stable compared with the same period in 2024 ¹
- 2. Within the South West, Plymouth, Somerset and Cornwall are notable source markets.

ERBID Visitor Survey 2025

- 3. The English Riviera Visitor Survey shows a stable pattern of visitor origin, with no significant change compared to the 2022 survey, although the respondent base does differ significantly from the Data Hub in terms of origin.
- 4. The vast majority of survey respondents come from within the UK, accounting for 99% of all respondents (N=357), while overseas visitors represent just 1%. UK visitors from outside the South West dominate the profile, making up nearly three-quarters of all respondents (74%). A further 25% originate from within the South West region.
- 5. In terms of specific origins, Bristol and Birmingham are the single largest postcode areas, each contributing 6% of visitors. This is followed by Sheffield and Exeter (4% each), with a wide spread of other urban centres such as Plymouth, Dudley, Nottingham, Leicester and Gloucester each contributing around 3%. ²

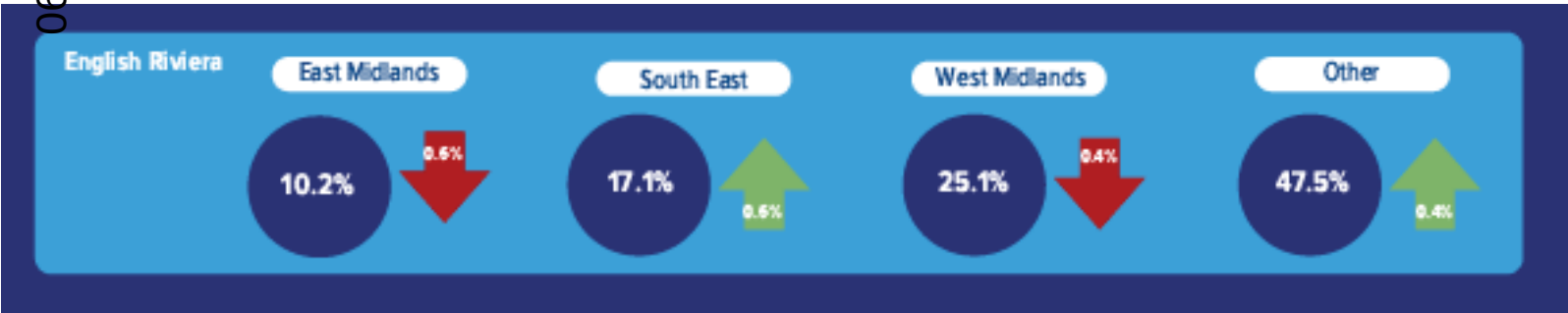
Figure 12. Visitor Origin from 2024 Visitor Survey ²

There was no change in the visitor origin compared with the 2022 survey.



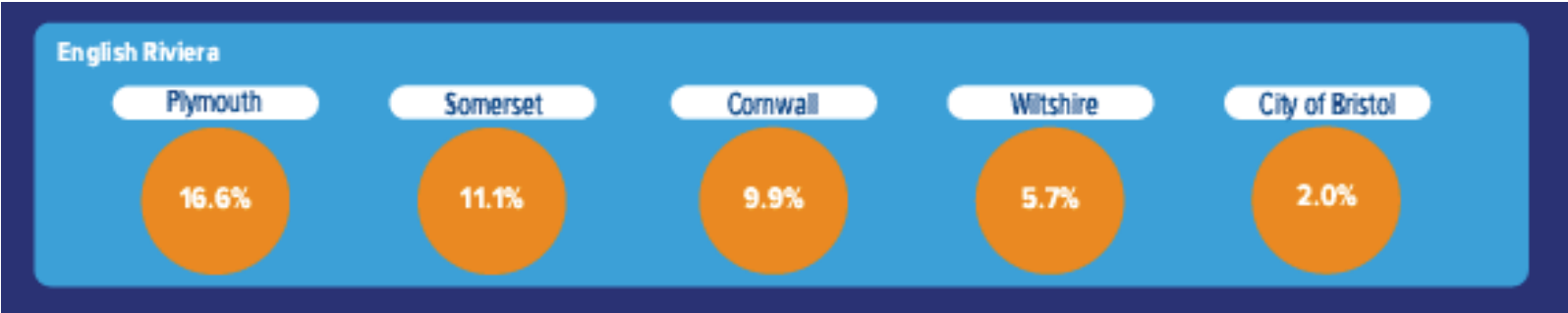
Postal area origin		% of 2024 visitors	Postal area origin		% of 2024 visitors
BS	Bristol	6%	ST	Stoke-On-Trent	3%
B	Birmingham	6%	CF	Cardiff	2%
S	Sheffield	4%	WR	Worcester	2%
EX	Exeter	4%	CV	Coventry	2%
PL	Plymouth	3%	OX	Oxford	2%
DY	Dudley	3%	RG	Reading	2%
NG	Nottingham	3%	BB	Blackburn	2%
LE	Leicester	3%	NN	Northampton	2%
GL	Gloucester	3%	SN	Swindon	2%
NP	Newport	3%			

Figure 10. Footfall Origin of Visitors to Torbay Q3 2025 - UK Regions ¹



Arrows show percentage change. Figures are benchmarked against same quarter in 2024

Figure 11. Footfall Origin of Visitors to Torbay Q3 2025 – South West



1. Source: Visitor Economy Report for English Riviera QUARTER 3 2025 Devon July - September 2025

2. Source: The English Riviera Visitor Survey 2024 Final Report Produced for and on behalf of The English Riviera BID Company by The South West Research Company Ltd. March 2025

Implications for Torbay

- Developing Inhouse resource and expertise in tourism statistics and insight would be beneficial to ensure regular reports are more consistent and well connected.
- Such a resource will then better interrogate and utilise existing datasets provided by the Datahub and other source and identify new research requirements.
- The accuracy of origin data presented on this page can be questioned on the basis of sample sizes – a fuller analysis of the BT mobile phone data held on the Datahub is advised.

1.3 Visitor Volumes, Value & Impact – International / Inbound

Figure 13. Inbound Visits (000)

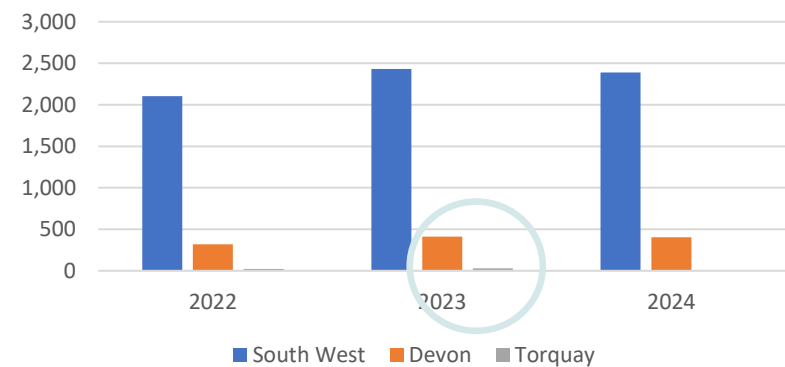
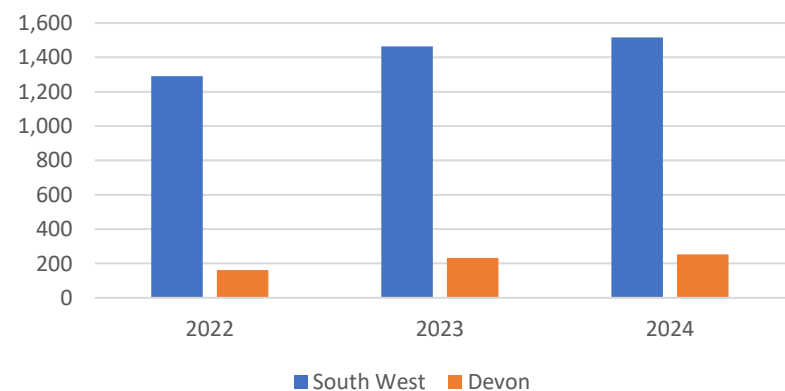


Figure 14. Inbound Nights (000)



Figure 15. Inbound Spend (£m)



1. Demand in the South West softened slightly in 2024 after a strong 2023, with visits down marginally but nominal spend continuing to grow, indicating higher value per trip.
2. Devon broadly followed this pattern for visits (slight dip vs 2023) but outperformed the wider region on nights and spend. Nights in Devon continued to rise in 2024, contrasting with a decline across the South West, suggesting longer stays. Spend growth in Devon was also strong, increasing again in 2024 and at a faster rate than visits, pointing to higher daily expenditure but note this is not adjusted for inflation.
3. Devon accounts for 17% of South West visits, underlining its importance to the regional visitor economy. Torquay represents 7.3% of Devon's inbound visitor market, a small but still significant contribution within the county.

Purpose of Visit

4. Holidays are important for Devon but account for a smaller share of visits, nights and spend than in the wider South West, indicating a more diversified visitor economy.
5. Visiting friends and relatives (VFR) is the largest market, providing consistent, year-round demand and supporting overall visit and night volumes.
6. Business and study trips generate a disproportionately high share of nights and spend, highlighting their importance for higher value, longer stays and reduced seasonality.

Implications for Torbay – Inbound Visitors

- Inbound visits to Torbay are marginal in numbers terms (see Figure 13 and the opportunity cost of inbound activity needs to be considered against a focus on domestic markets.
- Holiday trips form a smaller share of the Devon market, so Torbay should not depend solely on peak-season leisure demand.
- Strong VFR volumes support year-round demand, but typically generate lower (accommodation) spend, requiring a stronger offer and experiences to increase value.
- Higher business spend in Devon, when compared with the SW, suggests scope to grow meetings, conferences and corporate but the base is low and a focus on leisure is likely to drive profitability.
- Study travel delivers long stays and high spend in Devon, offering Torbay opportunities to support shoulder-season and off-season demand.

Figure 16. Purpose of Inbound Visits 2024
% of Visits

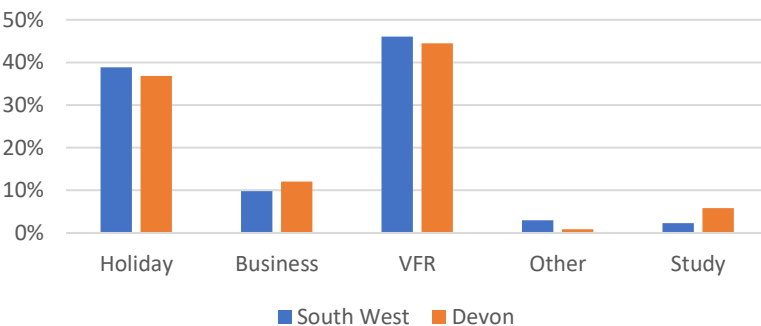


Figure 17. Purpose of Inbound Visits 2024
% of Nights

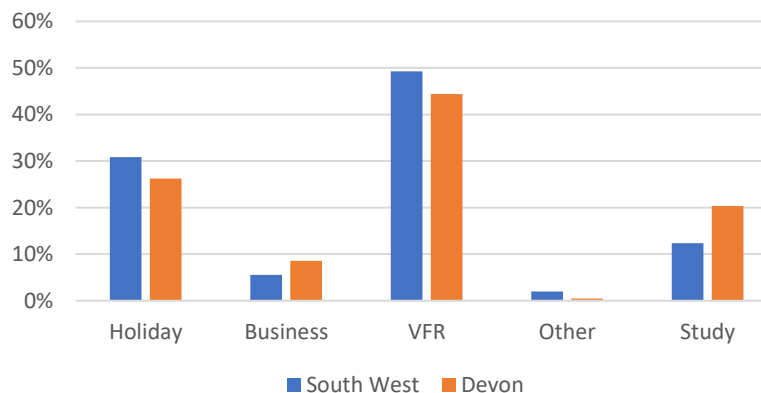
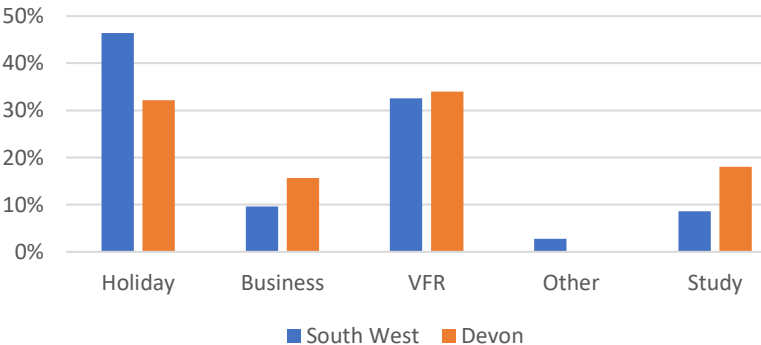


Figure 18. Purpose of Inbound Visits 2024
% of Spend



1. Source: International Passenger Survey (IPS)

1.3 Visitor Volumes, Value & Impact – International / Inbound

Torbay Markets for Short-term Lets

- Page 492
1. The ONS short-term lets dataset (Table 2) provides a valuable insight into the nationalities of international visitors choosing commercial self-catered accommodation (through Airbnb, Booking.com and Expedia Group) in Torbay. Analysing the top 25 inbound markets reveals a clear picture of Torbay's core overseas demand.
 2. The data indicates a strong dependence on principal European markets. Germany is the dominant source country, accounting for 28% of all sampled international visitors in this accommodation segment. This is followed by the Netherlands (11%), forming a significant bloc of North European demand.
 3. Together with France, Switzerland/Liechtenstein, Denmark, Belgium and Austria, EU nations constitute the overwhelming majority of inbound visitors staying in short-term lets.
 4. Beyond Europe, Torbay attracts meaningful visitation from key English-speaking long-haul markets, namely Australia (7%), the United States (7%), and Canada (2%). There is also emerging but smaller-scale demand from other global regions, including "Asia other" (5%), and individual countries like Brazil, China, and South Africa. This demonstrates a diversified, albeit Europe-centric, international appeal.

Table 3. Top Ten Inbound Markets to Devon 2022²

Market	Visits (000)	Nights (000)	Spend (£m)
1. Germany	41	247	18
2. USA	40	358	31
3. Netherlands	36	180	11
4. France	24	156	10
5. Ireland	18	80	7
6. Australia	17	169	12
7. Poland	13	67	2
8. Canada	15	119	5
9. Spain	14	226	6
10. Switzerland	11	79	6

Devon Markets

5. The data in Table 3 shows that Devon's top international markets in 2022 were dominated by European visitors, although the USA stands out as the highest-spending market despite only being the second-largest by visit numbers.
6. Germany generated the most visits overall (41,000) and a substantial 247,000 nights, reflecting strong interest and relatively long stays. The USA contributed a similar number of visits (40,000) but far more nights (358,000), resulting in by far the highest total spend (£31m), indicating higher-value, longer-haul travel.
7. The Netherlands and France followed as reliable mid-sized markets, each providing steady volumes of visits and spend. Australia, though only sixth in visit numbers, produced 169,000 nights in Devon —one of the highest averages— suggesting very long stays typical of long-haul travellers.
8. Poland and Canada generated modest spend relative to visit volume, while Spain produced a surprisingly high number of nights (226,000) despite ranking ninth in visits.

Implications for Torbay - Inbound Visitors

- Given that the top source markets in table 2 (Germany, Netherlands, Australia, France, USA, Ireland, and Switzerland / Liechtenstein) account for two thirds of inbound demand, targeted marketing efforts towards a small number of these key markets is likely to yield higher returns than a less-selective approach.
- Collaboration through the South West Group and VisitBritain would provide a cost-effective channel for this targeted promotion, leveraging regional and national tourism networks to reinforce Torbay's appeal to these proven audiences.
- It could be more productive to focus on a maximum of three inbound leisure markets over a three-year programme period with significant budgets that leverage other partnership income.

Table 2. Top 25 Inbound Visitors to Torbay 2024¹

Country	%
Germany	28%
Netherlands	11%
Australia	7%
France	7%
United States	7%
Switzerland and Liechtenstein	7%
Asia other	5%
Denmark	3%
Ireland	3%
Canada	2%
Belgium	2%
Spain	2%
Norway	2%
Austria	1%
Oceania other	1%
Czechia	1%
Poland	1%
Italy	1%
Europe other	1%
Sweden	1%
Missing	1%
South Africa	1%
Brazil	1%
Central and South America other	1%
China	1%

1. Source: Office for National Statistics, International Passenger Survey 2024
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/shorttermletsthroughonlinecollaborativeeconomyplatformsuk/januarytodecember2024>

2. Source: Office for National Statistics, International Passenger Survey, Subregion Trend by Purpose 2009-2022. Data at County level is only available up to 2022. IPS data for 2024 and 2025 is under review
<https://www.visitbritain.org/research-insights/inbound-visits-and-spend-quarterly-uk>

1.4 Market Segments

- Page 49
1. Torbay’s visitor base is ageing, potentially at a faster rate than the wider population. Torbay currently lacks a sufficient offer to attract younger visitors; even with new development, competition from alternative destinations may limit impact without a distinct and compelling proposition and greater level of focus on investment in the place.
 2. The most recent data from the South West Visitor Economy Hub indicates that visitors to the English Riviera in Q3 2025 were predominantly aged 35–64, accounting for the largest share of all visitors. The 65+ age group (22%) was the only demographic to record growth, increasing by 1.4% during the period.¹ Demographic trends will ensure this growth continues – and this is likely to include / attract active early retired independent travellers with cultural and sporting interests. Further work to fully understand this market and its potential is likely to be important as part of the new DMP.
 3. All age groups under 55 years experienced a decline in visitor share, with particularly low representation from 18 to 24-year-olds (3%).
 4. Over 11% of visitors to the English Riviera reported an accessibility requirement, a higher proportion than in either Exeter and Plymouth. There is a growth opportunity for Torbay to take greater advantage of the ‘Purple Pound’, given that nationally 20.8m overnight trips were taken by those with an impairment in 2024, and this segment spend more and stay longer. A focus on inclusion of many different visitor types can help Torbay continue to be a welcoming place for all visitors.
 5. Visitors travelling with children represented 17% of the market, below levels seen in Exeter and Plymouth. The majority of visitors (74%) travelled without children, in line with other Devon destinations.
 6. 16.% of visitors brought a dog on an overnight stay to the English Riviera. A further 5% indicated they would have travelled with a dog if suitable accommodation had been available. Demand for dog-friendly accommodation is lower than in North and South Devon but represents an opportunity for growth.

1. Source: South West Visitor Economy Hub, 2025, Visitor Economy Report for English Riviera – Quarter 3 2025, July - September 2025
2. Sources: English Riviera Destination Management Plan 2022-2030; English Riviera BID Destination Marketing Strategy 2024

Table 4. Assessment of Current Target Markets

Current Target Market	Source	Fit with 2025 Visitor Trends	Comments / Implications
Families (Fun by the Sea)	DMP, MS	Weak	Only 17.1% of visitors have dependent children—lower than Devon average. Family-focused attractions may need extra promotion or adaptation to maintain this segment.
Young Actives	DMP, MS	Weak	Decline in 18–34 visitors suggests reduced engagement. Torbay may need refreshed experiences or targeted campaigns to attract younger adults.
Cultural Explorers (incl. empty nesters)	DMP, MS	Strong	The growing 65+ and accessibility-focused visitors align well with this market. Traditional seaside, heritage, and cultural attractions fit these preferences. A growth market.
Business Tourism	DMP, MS	Weak	Current volume and value of business tourism is too small to be a priority market. Defined as longer-term priority in DMP.
Solo Travellers	MS	Moderate	Older adults and flexible travellers may include solo visitors; potential to develop solo-friendly packages or experiences. Marginal in terms of volume.
Groups – UK, international, educational	MS	Neutral	Data doesn’t directly reflect group trends, but dog-friendly and accessible experiences could appeal to certain UK group segments.
Independent International Travellers	MS	Neutral	Current market is very modest – marketing may be at disproportionate cost to revenues.
Cruise Ships	MS	Neutral	Data not currently captured, but older demographics may support shore excursions and day visits. Marginal impact with potential issues of visitor management depending on timings.

DMP = Destination Management Plan; MS = Marketing Strategy 2024

1. Table 4 right assesses the target market segments in the current DMP and in the 2024 Marketing Strategy (MS) against the market data and trends.²

Implications for Torbay – Market Segments

- The growing 65+ market strengthens demand for traditional seaside, cultural, heritage and low-impact activities. Older visitors are more flexible, supporting off-peak and shoulder-season growth if targeted appropriately.
- Despite the 11% of share, the accessible market still represents an unrealised opportunity given that it makes up around a fifth of all visits.
- Fewer visitors with dependent children reduces pressure on family-centric attractions but risks weaker school-holiday demand unless actively addressed.
- Unmet demand for dog-friendly accommodation presents a relatively quick win for extending stays and boosting spend.
- Promotion should increasingly emphasise comfort, ease, wellbeing, scenery and value, while selectively developing offers to rebalance younger and family segments if desired.
- Current origin analysis adds limited insight; access to raw BT data reported by the Datahub is needed to understand travel patterns beyond the expected proximity effect.

1.5 Seasonal Profile of Domestic Visits to Devon

1. Domestic tourism activity in 2024 shows a clear seasonal pattern across both overnight trips and day visits to Devon. ¹
2. Overnight trips increased steadily from Q1 to Q3 before declining in Q4. Trip volume rose from 0.9 million in Q1 to a peak of 1.1 million in Q3, reflecting stronger summer demand. This trend is mirrored in visitor spending, which increased substantially from £186.2m in Q1 to £396.7m in Q3, alongside a rise in bed nights from 2.3 million to 4.5 million. The Q4 slowdown saw volume fall to 0.8 million and spend reduce to £326.5m, indicating the impact of seasonality despite relatively strong end-of-year value.
3. Day visits followed a similar seasonal trajectory, with volumes climbing from 4.8 million in Q1 to 6.3 million in Q3, before dropping to 4.4 million in Q4. However, spending patterns differed: Q1 recorded the highest day-visit value (£421.7m), suggesting higher spend per visit early in the year. Spend then fell sharply in Q2 (£177.5m) before partially recovering in Q3 (£252.2m) and Q4 (£238.9m).
4. The data highlights Q3 as the peak period for domestic tourism activity, particularly for overnight trips, while spend per visit varies significantly by quarter, especially for day visitors. These trends reinforce the importance of seasonality in shaping both visitor volumes and economic impact.

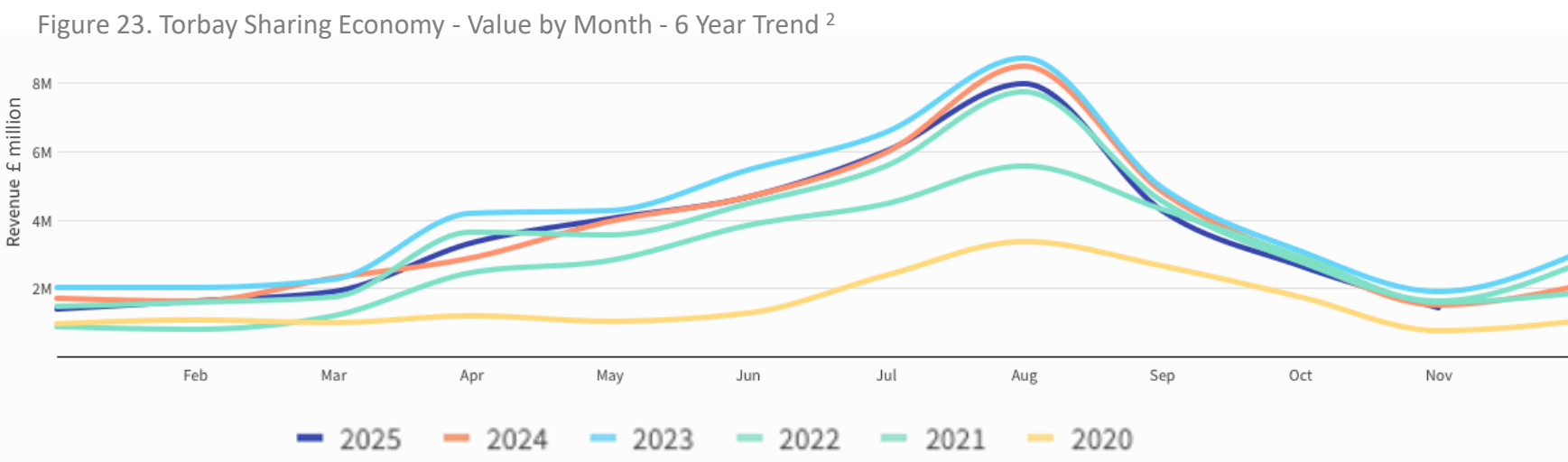
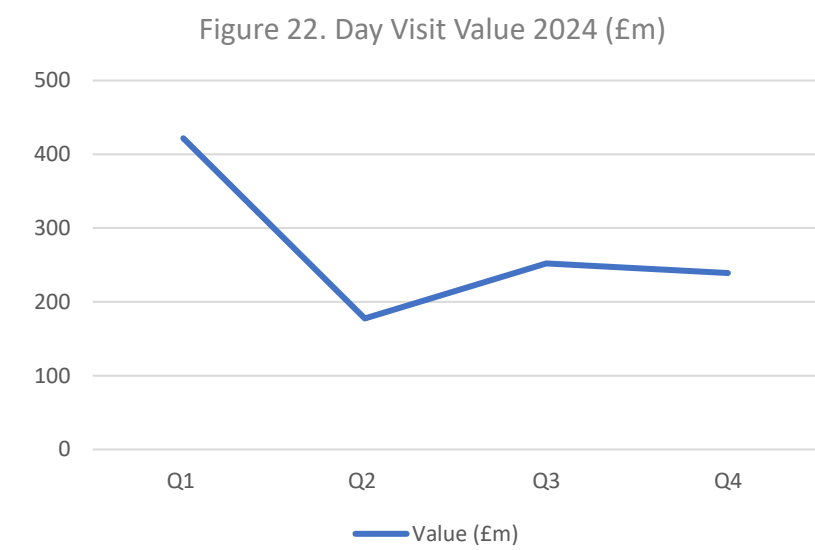
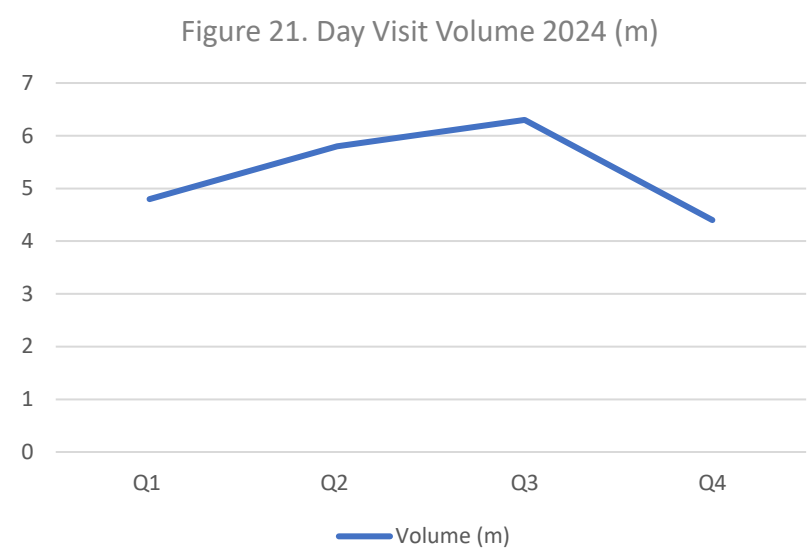
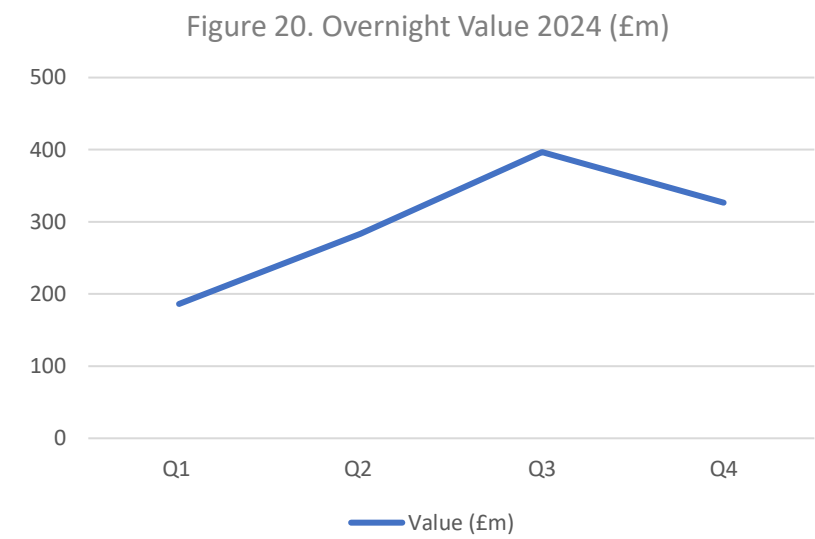
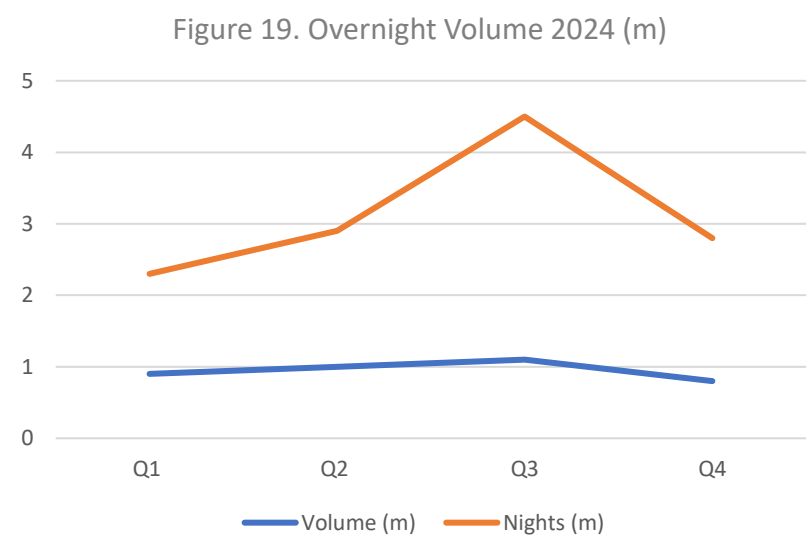
Page 494

Implications for Torbay

- Stand-out events that extend the season are already making a difference - such as the Bay of Lights. It would be helpful to undertake feasibility to assess options that can attract new audiences with a view to developing one or two further events of national importance during the next DMP period.
- A season extension plan could identify accommodation types, such as high-quality self-catering and boutique hotels, that are less susceptible to seasonal trends.

1. Source: VisitEngland <https://www.visitbritain.org/research-insights/domestic-tourism-latest-results#view-and-analyse-data>. Note: data only available for 2024.

2. Source AirDNA – short term lets revenues by month : includes international visitors - see slides 20 – 23 for details.



1.6 Market Trends

Consumer Confidence

- Page 495
1. UK consumer confidence showed a modest improvement in October 2025, rising for the first time since May, according to YouGov. The increase was mainly driven by stronger perceptions of household finances, both looking back over the previous month and ahead to the coming year.¹
 2. This suggests that, while many households remain under pressure from the cost of living, there are some early signs that financial anxiety may be easing slightly. However, broader economic confidence remains fragile, with continued uncertainty around house prices and business activity.²
 3. This cautiously improving sentiment has important implications for domestic travel. When people feel more secure about their finances, they are generally more willing to spend on discretionary items such as holidays and short breaks.
 4. In the current climate, UK-based trips continue to be viewed as a more affordable and lower-risk option compared with overseas travel. Even during periods of weaker confidence, many households have continued to prioritise short domestic breaks, suggesting that staycations remain a resilient part of consumer spending.
 5. That said, rising everyday costs still limit how much many people can spend on leisure. As a result, the uplift in confidence is likely to translate more into demand for shorter, lower-cost domestic trips rather than expensive or longer holidays. Overall, the recent improvement in consumer confidence points to steady but cautious growth in domestic travel, rather than a rapid rebound.
 6. Torbay is well placed to benefit from domestic staycations and short breaks. Late booking, flexible cancellation, and self-catering will continue to dominate booking behaviour. Peak summer seasons should remain strong, but shoulder and off-season demand will require active stimulation. E.g. through events and promotions but also making it easier to buy and change domestic trips.

1. Source: YouGov, October 2025: Consumer confidence rises for the first time since May (published 24 November 2025) [link](#)
2. Source: UK Parliament, House of Commons Library, Research Briefing - Business and consumer confidence: Economic indicators (Published 21 November 2025) [link](#)
3. Mintel, 2024, Hotels UK; Mintel, 2023, Holiday Rentals UK
4. Source: YouGov, 2025, Great Britain international traveller outlook 2026
5. VisitEngland, Domestic tourism: Q3 2025
6. Tourism Economics (2025) Global Travel: Key Themes for 2026 Dave Goodger and Helen McDermott December 2025



Accommodation Trends

7. Domestic tourism remains price-sensitive, with strong growth in holiday rentals driven by affordability, privacy, and self-catering.
8. Hotels face ongoing pressure from short-term lets and cost-of-living impacts, with demand focused on quality, flexibility, and online booking.
9. Interest is growing in glamping, camping, wellness breaks, and off-peak stays, particularly among families and younger visitors.
10. The over-65 market is growing but underused, with accessibility and service levels key barriers.³
11. Torbay’s visitor economy is likely to remain increasingly driven by self-catering and experience-led stays, with proximity to attractions a critical factor in choice. There is strong potential for diversification, shoulder-season growth, and managing the impact of short-term lets to sustain competitiveness.

Domestic Tourism Trends

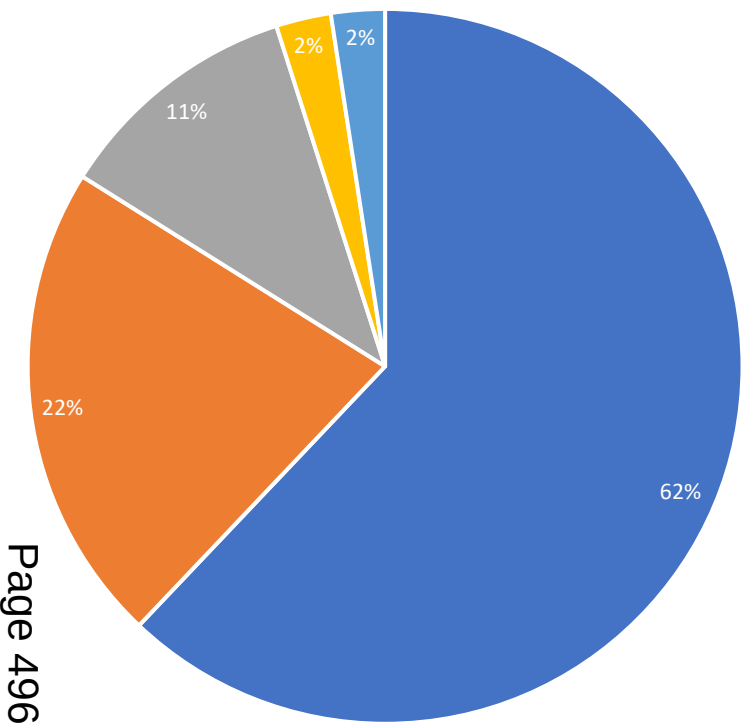
12. The volume of domestic overnight trips in England showed a minor decline from 2024 to 2025.
13. In terms of destination type, ‘large towns or cities’ increased their share of overnight trips in Q3 2025 vs the previous three years, while “seaside” declined.
14. Regionally, the South West’s share of overnight trips shows a declining trend for Q3 over the past 4 years (20% in 2022 and 2023, 18% in 2024, 16% in 2025).⁵
15. Despite economic headwinds, travel demand remains resilient with consumers prioritising expenditure on travel over other goods and services. Consumers however will likely need to prioritise the number of trips but the 40% identified by the You Gov survey that may shift trips to domestic destinations is an opportunity for Torbay.
16. Value for money remains highly important with 92% of consumers looking for better value, more discounts and special offers in Q3 2025 up from 83% in Q3 2024. New experiences are also being prioritised, over iconic and affordable destinations across all generations.⁶

Implications for Torbay

- Market trends and the wider economic context over the next two years means that value for money will become more important. Both the accommodation and attractions offer needs to have value at its core as well as being of high quality. This represents an opportunity for Torbay and a business support programme to encourage value-led offers would help cement a revitalised proposition.
- The product is likely to need upgrading and to move with the times – whether that is via private sector-led enterprise and investment or underpinning improvements from the public sector. It could be helpful to use what is likely to be a difficult trading period over the next 2 to 3 years to identify and develop key elements of the product that can be ready for growth when it comes.
- This could include the development of further specific ‘visitable’ Geopark assets, within the UNESCO designation which covers all of Torbay together with Agatha Christie experiences, Paignton Zoo and those other strategically important visitor attractions identified on Page 25.

1.7 Employment

Figure 24. Torbay Direct Visitor Economy Employment 2024



- Accommodation
- Catering
- Attractions/entertainment
- Retailing
- Transport

1. Annex I shows total direct employment in the tourism economy as defined by the ONS. This does not include employment in the sharing economy as shown on page 22 (e.g. often non-serviced accommodation) so understates the overall impact.
2. Jobs are heavily concentrated in accommodation (62%) and catering (22%), with attractions, retail, and transport making up smaller shares. This indicates a visitor economy skewed towards hospitality services rather than a broad-based experience economy.
3. The broader Visitor Economy which is drawn from the ONS defined SIC codes as shown in Annex I shows some 9,445 jobs are sustained by spending in these service-related businesses.
4. From this estimate we calculate the direct jobs that are likely to be underpinned solely by the expenditure of visitors to Torbay. On this basis an estimated 4,623 jobs are sustained directly by the tourism economy, resulting in 2,126 FTE jobs.
5. The 4,623 direct jobs equate to an estimated 2,126 Full-Time Equivalent (FTE) jobs, highlighting the prevalence of part-time, seasonal, or casual employment in the sector.

6. Annex 1 estimates do not include indirect or induced jobs typically reported by the Cambridge model, such as South West Research Company’s Economic Impact of the Torbay Visitor Economy. There are advantages to reporting a number of employment measures with direct jobs derived from SIC codes often favoured by the ONS and the Treasury.

Implications for Torbay

- It will be important to support and diversify the accommodation sector (e.g., building resilience, promoting high quality standards, sustainable practices and off-season use). Over-dependence makes the economy vulnerable to shocks in the accommodation market (e.g., changes to tax rates and regulations, cost pressures).
- The aim should be to diversify the visitor offer to stimulate growth in under-represented sectors like attractions, entertainment, and retail. This could involve developing new experiences, events, and retail offerings that encourage visitor spending beyond bed and board, thereby creating a more resilient economy and spreading employment benefits.
- The figures understate the overall impact as they exclude the sharing economy and indirect / induced jobs. The DMP should acknowledge this hidden impact and consider strategies to engage with or formalise parts of the sharing economy, to improve quality control and ensure a fair business environment.
- Extending the season and creating more year-round, high-quality jobs. is the next step. This needs a fully fledged partnership with universities and colleges to ensure a pipeline of motivated talent and address potential workforce vulnerabilities. Strong links with education and training providers is likely to be a critical part of the new DMP.



Shutterstock (2025) Young trainee chefs_119348407

1. ONS 2024, Business Register and Employment Survey (see Annex I for full list)

2. Strategic Alignment

2.1 Devon & Torbay Strategic Policy Framework

Key Strategy Documents

(More detail of the following documents is given in Annex II)

1. ERBID Consultation Document (2027-2031)

Objective: Position the visitor economy at the core of Torbay’s future.

- Commit to strategic investment in destination marketing and product development.
- Enhance partnership working to drive sustainable tourism.

2. Destination Management Plan (DMP) Support

Objective: Re-establish the English Riviera as a premier coastal destination.

- Drive higher-value, year-round tourism using data and market insights.

• Focus on sustainability, accessibility, collaboration, and innovation.

3. Economic Growth Strategy (2022-2030)

Objective: Recognise the visitor economy as essential for Torbay’s prosperity.

- Improve infrastructure and town-centre aesthetics.
- Focus on skills development, business innovation, and place-brand enhancement.

4. Food Strategy (2025-2030)

Objective: Enhance Torbay’s food culture as a visitor attraction.

- Improve product quality and sustainability in the food sector.
- Foster local supply chains and support food-led events.

5. Outdoor Events Strategy (2021-2027)

Objective: Use outdoor events to enhance visitor experience and economic growth.

- Prioritise high-quality, well-managed events.
- Extend the tourism season and attract diverse audiences.

6. Heritage Strategy (2021-2026, Part 2)

Objective: Leverage heritage assets to enhance visitor experience and economic growth.

- Focus on product development and collaboration across cultural and tourism sectors.
- Improve access and interpretation of heritage sites.

7. Geopark Management Plan (2023-2033, Part 2)

Objective: Position the UNESCO Global Geopark as a key asset.

- Protect and enhance natural heritage while providing educational experiences.
- Ensure responsible tourism practices and community engagement.

8. Community and Corporate Plan (2023-2043)

Objective: Create a resilient and high-quality visitor economy.

- Improve infrastructure and promote sustainable development.
- Strengthen partnerships and enhance community wellbeing.

9. Sustainability and Climate Resilience

Objective: Integrate sustainability and environmental stewardship into Torbay’s long-term planning.

- Focus on carbon reduction, biodiversity conservation, and coastal protection.
- Improve access to green spaces to enhance the visitor experience and resilience.

10. Torbay Story

Objective: Strengthen the identity and market positioning of the English Riviera.

- Develop a unified narrative and visual language for branding.
- Support consistent promotion of Torbay’s strengths and character.

Summary of Key Points

1. All strategies emphasise the importance of enhancing the visitor economy through targeted investments, innovative product development, and strong partnerships. These strategies collectively aim to transform Torbay into a vibrant, resilient, and attractive coastal destination that benefits both visitors and the local community.
2. A consistent theme across all strategies is the commitment to sustainability, environmental stewardship, and climate resilience to ensure a high-quality visitor experience.
3. Strategies stress the importance of community involvement, improving infrastructure, and fostering a sense of place to create a welcoming environment for both residents and visitors.
4. Leveraging Torbay’s rich heritage and food culture is seen as vital for attracting diverse audiences and enhancing the overall visitor experience.
5. Many strategies highlight the need for collaboration among stakeholders to achieve shared goals and improve the competitiveness of Torbay as a tourist destination.

2.1 Devon & Torbay Strategic Policy Framework

Devon-wide Strategies

1. Devon & Partners LVEP Growth Plan (2025-2026)

Objective: Strengthen coordination and enhance destination competitiveness.

- Improve data and insights to inform decision-making.
- Streamline governance structures for better collaboration.
- Develop high-quality visitor products to enhance the visitor experience.
- Boost regional marketing impact to attract more visitors.

Reinforces the DMP’s vision of a resilient and distinctive English Riviera, benefiting both visitors and local communities.

2. Great South West Tourism Partnership Prospectus

Objective: Promote a strategic approach to strengthen the visitor economy in the South West.

- Encourage regional collaboration among stakeholders.
- Invest in skills development and infrastructure for sustainable tourism.
- Advocate for a unified voice for the South West to increase national recognition and funding.

Complements the DMP’s goals, creating conditions for Torbay to thrive as a leading coastal destination.

3. Devon and Torbay Local Growth Plan

Objective: Recognise and enhance the visitor economy as a driver of local prosperity.

- Focus on improving infrastructure and business support.
- Promote skills development and sustainability initiatives.
- Foster place-making efforts to strengthen destination identity.

Aligns with DMP priorities to create a vibrant, well-managed coastal destination that supports long-term community and economic wellbeing.

Summary of Key Points

1. The strategic frameworks outlined aim to cultivate a more competitive, resilient, and sustainable visitor economy in the South West, with a strong emphasis on collaboration, data-driven planning, and community engagement. A key focus across all strategies is the necessity for improved coordination among local, regional, and national stakeholders to enhance the overall visitor economy.
2. Each strategy aligns with a broader vision of creating a well-managed and competitive visitor economy that supports sustainable growth and delivers community benefits. Encouraging innovation within the tourism sector is another critical component, as it not only boosts competitiveness but also enhances the overall visitor experience.
3. Sustainability and responsible tourism practices are consistently highlighted as essential for ensuring long-term viability. Investment in infrastructure and skills development is vital for fostering a thriving visitor economy that can meet evolving demands.

Implications for Torbay – Policy & Strategy

- The strategies provide important context for future growth. They typically include numerous priorities, are not always well resourced and delivery responsibilities are often not fully articulated. It will be important for the new DMP to clearly set out the delivery side as well as being firm on the core priorities.
- There are important policy changes coming down the track such as the Statutory Registration Scheme (which may reduce the supply of sharing economy properties) and the potential for a visitor levy via the Devon & Torbay Combined County Authority (currently in consultation). This may offer a route for Torbay to resource the future development and marketing of its visitor economy and warrants review and response. This is particularly important given that many other local authorities are likely to take the route and where tourism taxes on staying visitors are likely to be the norm in 15 years, rather than the exception that they are today.
- The ultimate goal is to establish economic conditions that benefit both visitors and the local community, contributing to a vibrant, inclusive, and resilient coastal destination. A focus on evidence-led planning and insights is crucial for informing product development and marketing strategies. Strengthening the unique identity of the English Riviera is also a priority, enhancing its appeal and market positioning to attract more visitors and showcase the strengths of Torbay, together with Devon and the wider South West.

2.2 Current Governance Model

1.

The governance of the English Riviera's Destination Management Plan is currently overseen by the Destination Management Group (DMG). This group has played a pivotal role in the implementation and delivery of the DMP, fostering collaboration among various organisations and tourism businesses to enhance Torbay's development, marketing and sustainable management.
2.

The DMG brings together public and private sector partners, ensuring a balanced representation that leverages diverse expertise. The DMG is committed to making optimal use of existing resources while actively seeking additional investments to fulfil the DMP's objectives.
3.

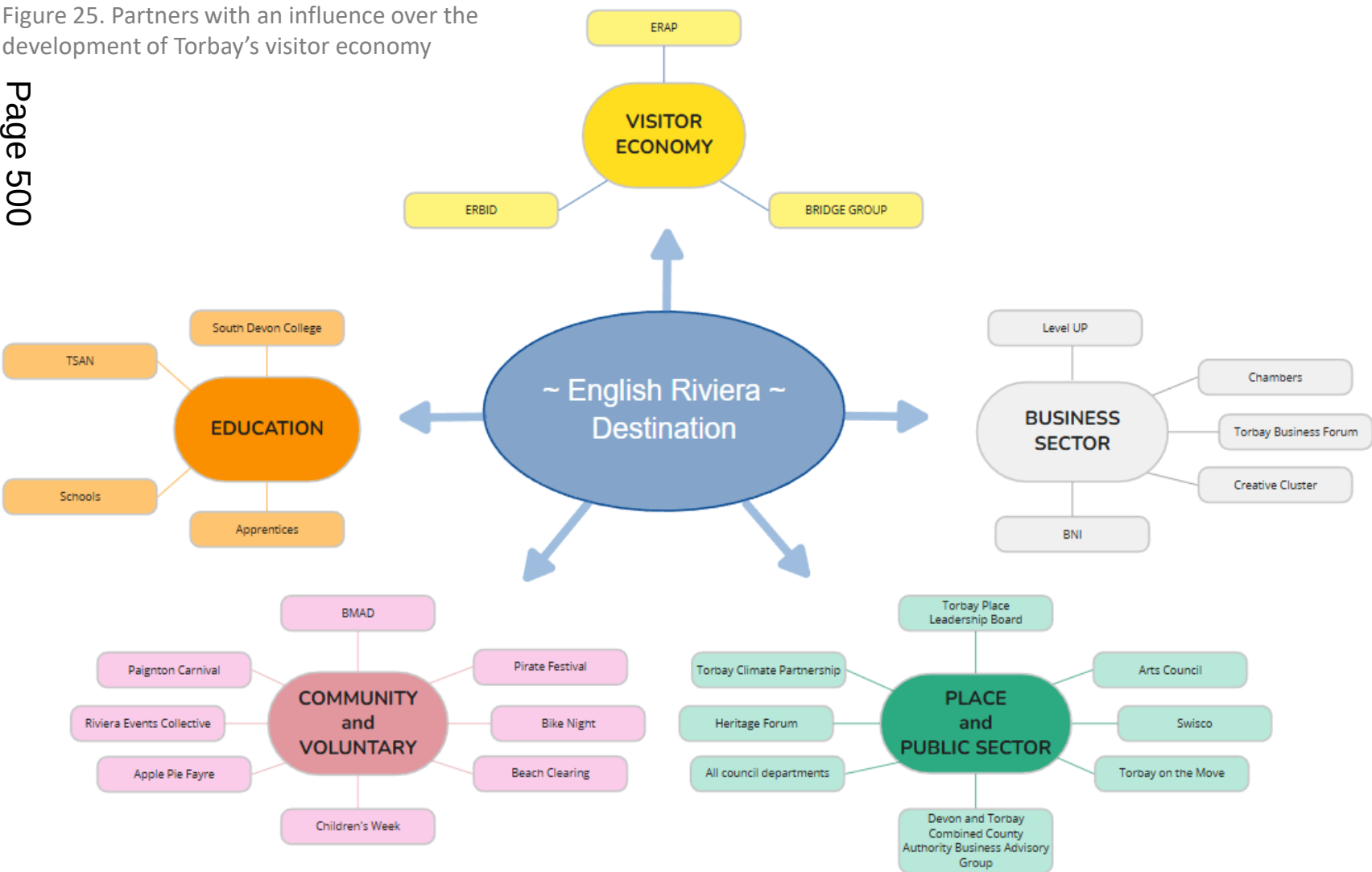
Recognising the demands placed on its members, the DMG acknowledges the need for a dedicated executive team to support the execution of the DMP's initiatives. This support is crucial for translating strategic plans into actionable tasks.
4.

The DMP is designed to align with the Torbay Economic Growth Strategy 2022-2030, outlining specific interventions aimed at advancing the English Riviera as a premier visitor destination. The first draft of the Plan focused on targeted actions and priorities, with lead organisations specified to deliver on specific tasks. In summary, the DMG serves as the central body for the governance of the DMP, driving collaboration, resource management, and strategic alignment to enhance the tourism landscape of the English Riviera.

5.

The development of a revised Destination Management Plan acknowledges that progress against the targets previously set out in the 2022 Plan has been slower to meet than required. While the existing Terms of Reference of the DMG set out sensible objectives together with details of collective and individual responsibilities, monitoring and outcomes and authority but it has no executive powers other than those which is likely to limit its .

Figure 25. Partners with an influence over the development of Torbay's visitor economy



Implications for Torbay - Governance Models

- The diverse array of business, community and stakeholder groups presents a significant opportunity for action for the new Destination Management Plan (DMP). By fostering coordinated action, the DMP can align strategic projects with the operational delivery creating a cohesive approach to growing the visitor economy.
- Central to this collaborative effort is likely to be the Place Board, which could serve as the focal point for assigning relevant actions to specific groups. To implement actions effectively, the creation of task and finish groups may prove to to be important. Such groups could be composed of key members from established organisations/groups who can act as catalysts for action, taking specific priorities forward and ensuring that progress is made.
- The establishment of accountable action planning and delivery groups is likely to be important for delivering actionable strategies and fostering collaboration. These groups can inspire the business community by clearly linking initiatives to tangible benefits.
- By harnessing the strengths of diverse stakeholders, a robust framework for action could be created that not only drives growth but also enhances the overall vitality of the visitor economy and ensures that Torbay is well-positioned to meet the challenges and opportunities ahead.

3. Destination Supply Side – The English Riviera Today

3.1 Tourism Economy Accommodation – 2019 Audit

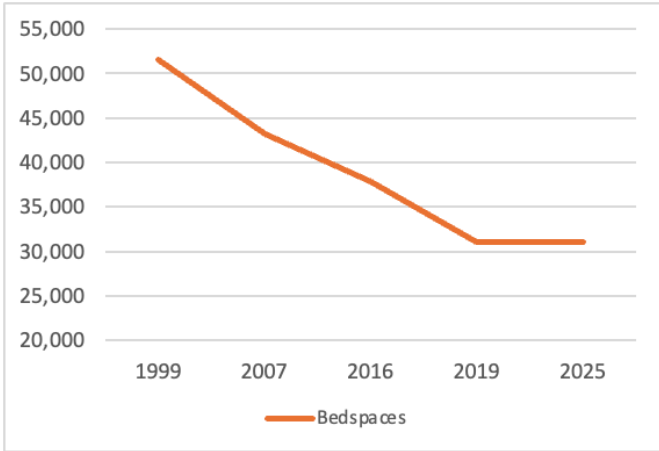
Figure 26. Accommodation supply by Number and Type



Torbay 2019 Visitor Accommodation by Type



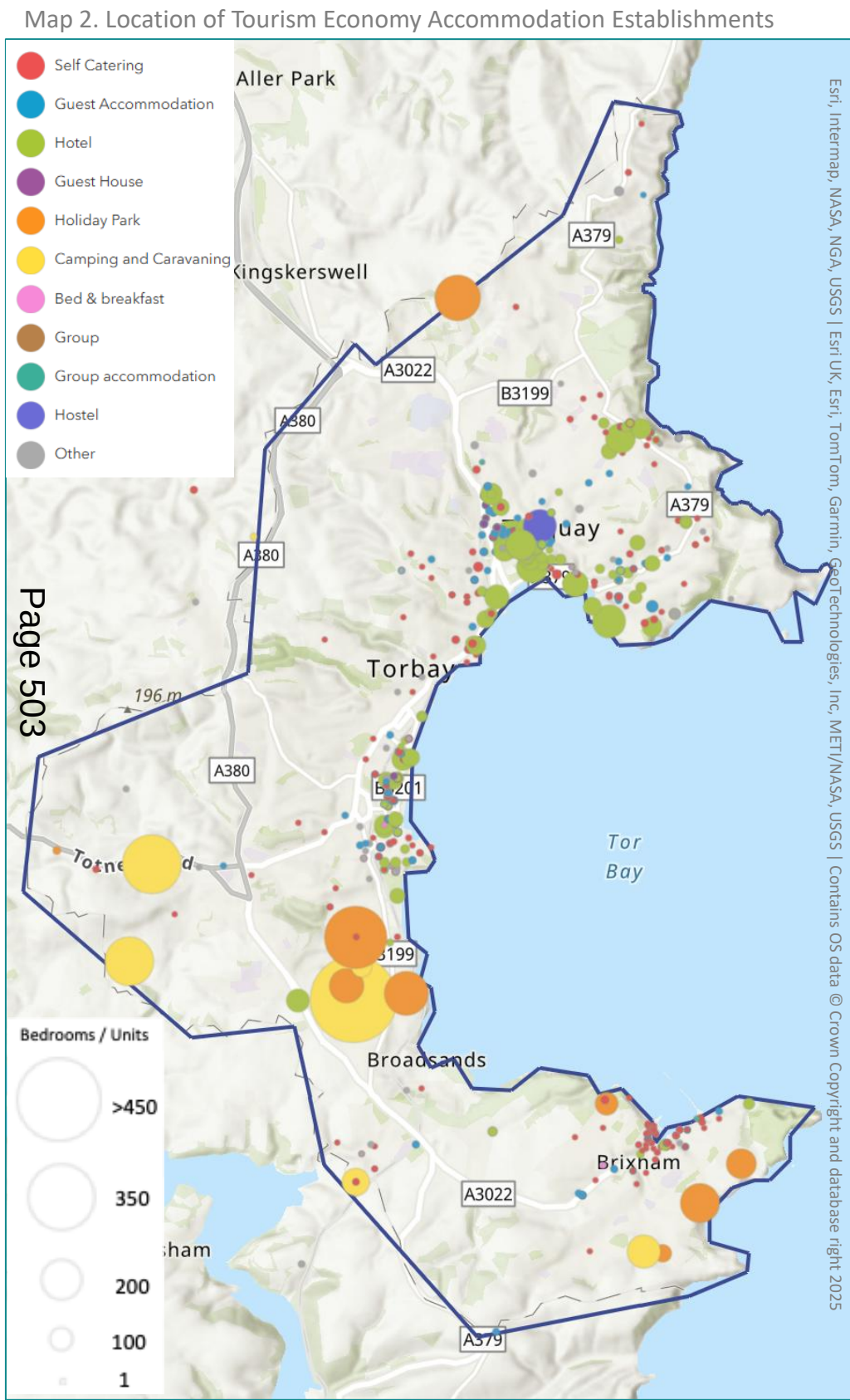
Figure 27. Accommodation Supply: 25-Year Trend



1. A 2019 audit of Torbay’s visitor accommodation supply found 914 establishments, amounting to 11,001 rooms or units. Over half of the total establishments (54%) were self-catering. Serviced accommodation including B&Bs, guest houses and hotels made up 41%. ¹
2. The map overleaf on page 21 shows that visitor accommodation in Torbay is heavily concentrated in Torquay, which contains the largest share of establishments at 40%, reinforcing its position as the area’s primary visitor centre. Paignton accounts for a further 29%, indicating a strong secondary accommodation base, while Brixham holds 24%, still a significant but more specialised tourism market. Babbacombe, with just 8% of establishments, has a much smaller and more localised accommodation offer compared with the main resorts.
3. The audit highlighted a lower supply of branded hotels in Torbay (9%), compared to the UK (47%) and to other coastal places such as Brighton (50%), Scarborough (25%) and Bournemouth (33%). ^{2,3}
4. There was a small increase noted in Torquay’s serviced accommodation supply between 2014 and 2019, with only 3% (350 bed spaces) growth in the number of bed spaces. Comparatively, both Paignton and Brixham saw increases of 37% (1,080 bed spaces) and 35% (175 bed spaces) respectively.
5. The 2019 Accommodation Audit identified just two properties on Airbnb. In November 2025 there were 1,409 properties listed on Airbnb across Torbay which represents a decline of 6.1% over 2024. There were 1,740 listed in August 2025. Nationally, there has been a 28% increase in the number of short-term rental properties available since 2019. ⁴
6. Peak season serviced accommodation occupancy remains below 80%, indicating an oversupply of stock ⁵
7. Figure 27 shows the 25-year trend of declining bedspaces which is not unusual amongst the majority of English resorts.
8. It is estimated that since the 2019 audit the number of bedspaces may have been maintained or increased marginally as a result of the growth in the Sharing Economy adding some 5,000 bedspaces across Torbay.
9. Ideally the 2019 audit should be updated as since it is likely that a proportion of smaller B&Bs will have transferred to self-catering operation with distribution through Airbnb, Booking.com or similar channels.
10. Any increase in supply since 2019 has clearly been affected by structural problems including COVID-19 and the cost-of-living crisis. This has put substantial and continued pressure on all types of tourism businesses. This pressure is not about to let up given recent increases in employers NI upcoming business rates increases and continued downward pressure on the number of staying visitors and the new Plan needs to reflect this reality.

1. Source: Torbay Accommodation Audit database 2019
2. Institute of Hospitality (Spotlight on Hospitality 2019), from Summary Serviced Accommodation in Torbay 2019
3. AM:PM from Summary Serviced Accommodation in Torbay 2019
4. Source: VisitBritain <https://www.visitbritain.org/research-insights/uk-short-term-rentals>
5. Source: South West Visitor Economy Hub, 2025, Visitor Economy Report for English Riviera – Quarter 3 2025, July - September 2025

3.2 Accommodation Supply & Distribution



1. This page splits visitor accommodation supply into two main clusters, the Tourism Economy and the Sharing Economy. Data is from 2019 and 2025 respectively.
 - *The Tourism Economy* reflects the professional sector, usually run by businesses registered at Companies House, that have a website, often employ staff, may pay VAT and are often be a member of a tourism body, typically a trade association or DMO. The majority of serviced accommodation is part of the tourism economy but it also includes many non-serviced holiday cottage businesses.
 - *The Sharing Economy* reflects the emergence of less formal operations that are usually promoted through one or more channels such as Airbnb and are often not businesses, but instead operated by individual property and home owners, usually on a non-serviced basis.
2. Typically, the Sharing Economy has more establishments but the Tourism Economy has the higher number of rooms, reflecting the larger scale nature of most professional operations.
3. While there are two broad clusters of accommodation types, there are also two main categories within the Tourism Economy: serviced and non-serviced accommodation. This recognises the very different experience provided by a serviced offer, which in general has declined in favour of non-serviced over the last decade.
4. Table 5 gives an indicative view of Torbay's current supply. Map 2 shows the prevalence of a high number of small businesses trading with under 3 rooms, clusters of hotels in Torquay and Paignton and a number of larger holiday parks and camp sites, particularly to the south of the area.
5. The Sharing Economy is reported in more detail overleaf.

Table 5 Accommodation supply: Tourism Economy & Sharing Economy

	Establishments	%	# Serviced Rooms	# Non-Serviced Rooms	Total Rooms	%
Babbacombe	70		946	72	1,018	
Brixham	216		287	844	1,131	
Paignton	264		1,717	2,215	3,932	
Torquay	364		4,102	818	4,920	
Tourism Economy	914	39%	7,052	3,949	11,001	81%
Sharing Economy	1,447	61%		2,605	2,605	19%
Total Stock	2,361		7,052	6,554	13,606	

NB - Indicative figures. Many 2019 properties now likely to be trading via Airbnb and offering a non-serviced offer
Data for Tourism Economy sourced from ERBID/Torbay Council. Sharing Economy data derived from AirDNA 2025
Sharing economy stock taken as an average using August 2025 & November 2025 listings data

3.3 Accommodation Supply – Sharing Economy

Figure 28. Sharing Economy Revenue £m - 2025 Year to Date



Table 6. Torbay UA - Sharing Economy - YTD Summary

Sharing Economy Performance Jan 2025 - Nov 2025	Total	Against last year
Total Revenue	£29,400,000	-7.5%
# Available Listings	15,605	-7.9%
# Booked Listings	14,016	-3.9%
Room Nights Available	735,658	-6.6%
Room Nights Booked	393,268	-3.9%
Occupancy Rate	55%	3.5%
Average Day Rate	£144	-3.9%
RevPAR	£78.90	-0.5%
Jobs supported by Revenue <i>circa</i>	537	

Figure 29. SE Low & High Season Comparative Occupancy

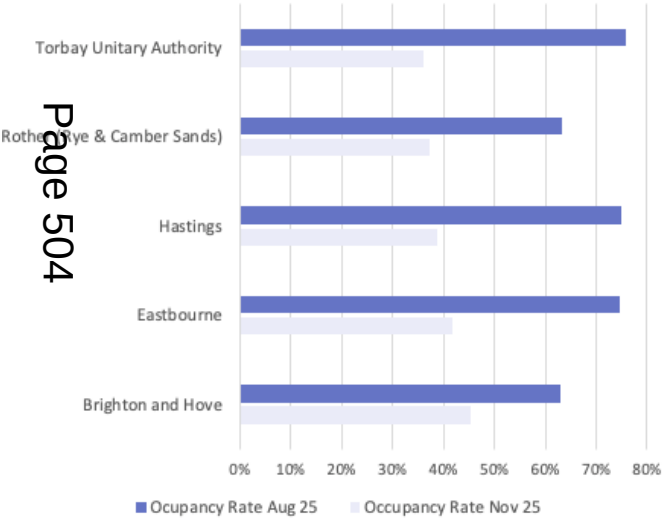


Figure 30. SE Relative Size and Three-Year Growth Trend
(Revenue in £m for September 2025 and the two previous years)

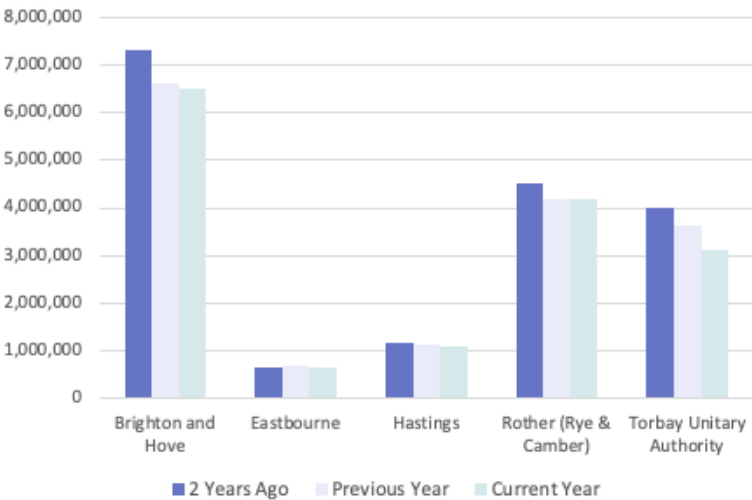
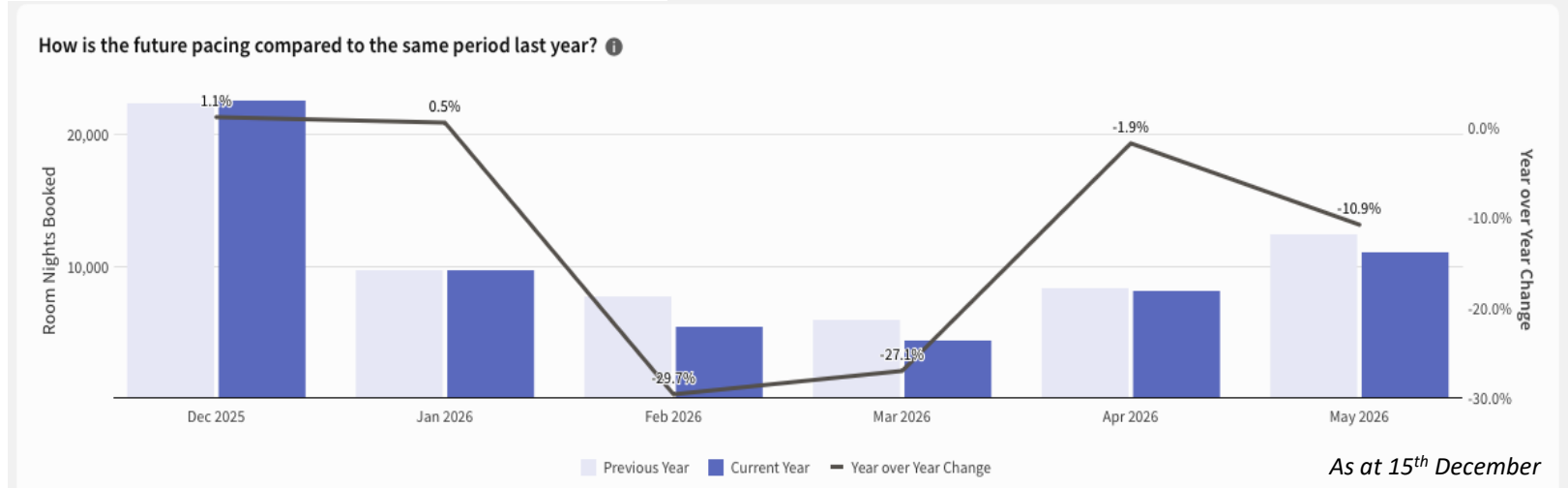


Figure 31. SE – Forward Bookings – to May 2026



1. Table 6 shows that total revenue from Sharing Economy businesses in the 11-month period to November 2025 was £29.4 millions trading from around 1,450 properties underpinning an estimated 537 jobs - which will be largely hidden from official statistics. ¹
2. The performance has suffered when looked at against the last two years but that trend is not confined to Torbay and is hitting other resorts in the same way due to cost-of-living pressures – see Figure 30.
3. An average occupancy rate of 55% across the period is reasonable and slightly higher than many inland and rural destinations, but somewhat lower than many towns. It has gone up as supply has contracted in 2025 when compared to 2024. Torbay compares well for high-season occupancy against the comparators shown in Figure 29.
4. However, occupancy in the winter (i.e. November 25 in the chart showing other comparator destinations) is lower in Torbay than in any of the other comparator destinations. This reflects in part the catchment and can be addressed with events and other action to draw people in, particularly during the Autumn shoulder.
5. Sharing economy properties represent 19% of all rooms in Torbay and are an important component, potentially attracting a younger audience than the more traditional stock. There would be benefits in developing this network, as at the moment many will be operating in isolation.
6. Figure 31 shows that Sharing economy forward bookings are softer in 2026 when compared against this year reflecting the fragility in current consumer confidence.

Implications for Torbay – Accommodation

- There is still a general oversupply of stock which depresses occupancy rates and reduces the viability of proposed / new accommodation developments
- Operators in the Sharing Economy should be supported and engaged in the DMP to maximise quality and create synergies across the wider visitor economy.

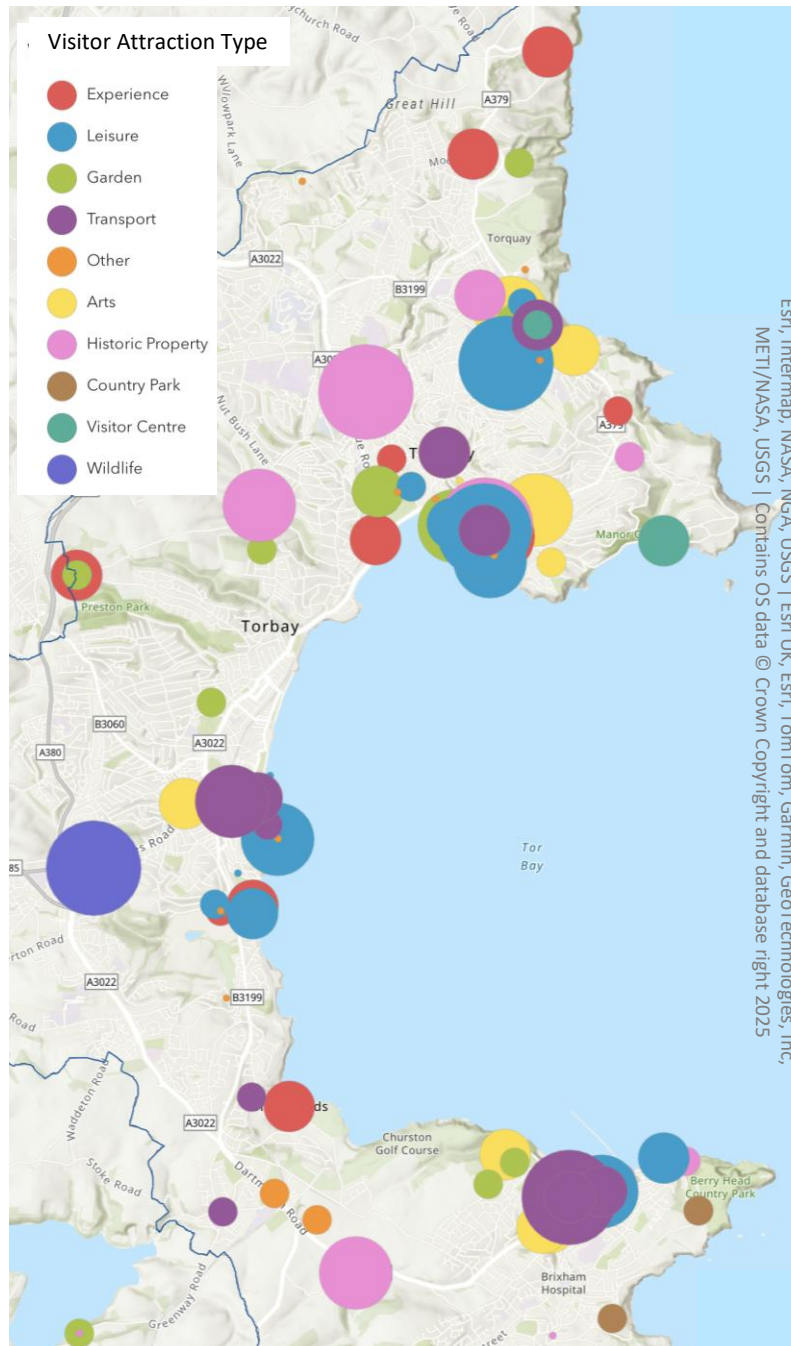
1. Job estimates calculated using Deloitte & Oxford Economics methodology set out in *Tourism Jobs & Growth* November 2013 commissioned by VisitBritain

3.4 Visitor Attractions

Table 7. Visitor Attractions in Torbay by Type

Main Category	Nos.	Category Detail	Nos.
Country Park	6	Playground	1
		Municipal Park	1
		Nature Reserve / Wetlands etc	3
		Sculpture Park	1
Experience	33	Cookery	0
		Cycling	2
		Guided Tour	9
		National Trail	1
		Outdoor	13
		Arts / Crafts	1
		Riding	0
		Walking Routes / Car Free Trails	6
		Other Experience	1
Garden	19	Formal / Park / Estate	11
		Arboretum / Caves / Forest	8
Historic Property	11	Abbey / Castle / Fort / Tower / Priory	1
		Historic House / & Garden / Palace	4
		Monument / Archaeological Site	3
		Place of Worship (still in use)	1
		Other Historic Property	2
Leisure	46	Beach	25
		Bowling / Casino / Cinema	3
		Public Space	5
		Model Village	1
		Gaming / Entertainment / Leisure Zones	3
		Theme Park / Adventure Park	6
		Lake / Reservoir / Recreation	3
Arts	12	Museum	6
		Art Gallery / Arts Centre / Theatre	6
		Venue - Music etc	0
Transport	19	Miniature / Model Railway	0
		Steam / Heritage Railway	2
		River Cruise / Boat Tours	14
		Transport - Other	3
Visitor Centre	3	Heritage / Visitor Centre	1
		Viewpoint	2
Wildlife	1	Farm / Rare Breeds / Farm Animals	0
		Safari Park / Zoo / Aquarium / Aviary	1
Workplace	0	Distillery / Vineyard / Brewery	0
		Industrial / Craft Workplace	0
Other	13	Specialist Retail	0
		Sports Venue - Spectator	1
		Sports Venue - Participant	12
	163		163

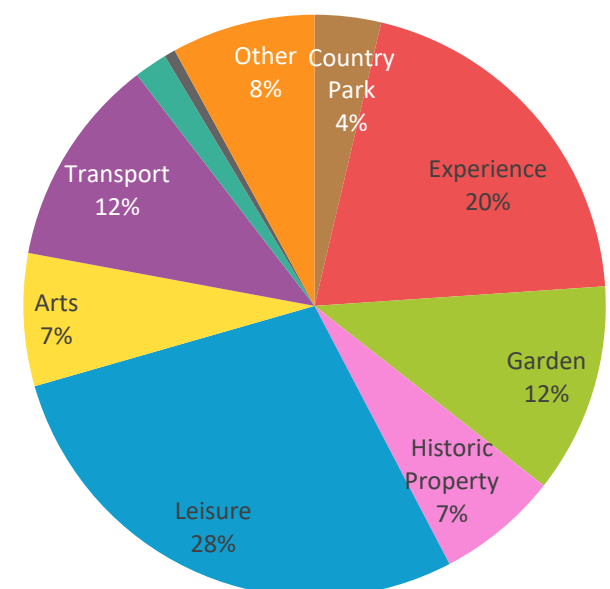
Map 3. Visitor Attractions - Distribution across Torbay



NB – Map shows all visitor attractions on the table apart from the area's 25 beaches. The size of the circle reflects the Attraction's strategic importance – see overleaf for further commentary.

1. While there are 144 attractions and 61 activities listed on the English Riviera BID website some of these report multiple activities at the same site, or are generic or are only likely to be of interest to a local market.¹
2. The analysis here reports 163 visitor attractions in or around Torbay that are likely to be important for visitors to varying extents.
3. As the map shows, the geographic spread of attractions in Torbay is clearly centred on Torquay, which accounts for the largest share at 45%, reflecting its role as the district's main tourism hub. Paignton follows with 25%, showing its strong contribution to the overall visitor offer, while Brixham provides 22%, likely linked to its harbour, maritime heritage, and wildlife experiences. Babbacombe has a much smaller share.
4. The leisure offer predominates backed up by a range of historic properties and gardens often combining which will be of interest particularly to the more senior market. Numerous experiences are listed and make up 20% of the offer but are less likely to be important from the perspective of driving visitors to Torbay. Some of the transport related visitor attractions are important whether that be by boat or steam train.

Figure 32 Visitor Attractions By Type



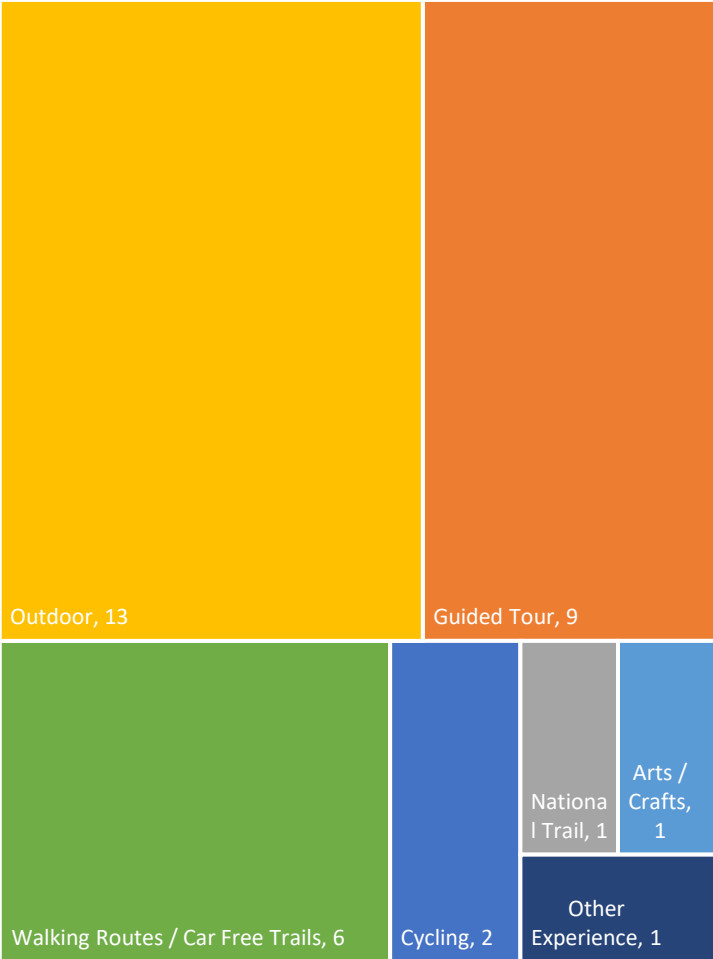
1. Source: <https://www.englishriviera.co.uk/things-to-do/english-riviera-attractions>

3.5 Strategically Important Visitor Attractions

Table 8. Strategically Important Visitor Attractions

Name	TT Category Detail
National Trust - Greenway	Historic Property
Kents Cavern Prehistoric Caves	Historic Property
Torquay Harbour & Marina	Leisure
Torquay Marina	Leisure
Dartmouth Steam Railway and River Boat Co.	Transport
Paignton Zoo	Wildlife
Princess Theatre, Torquay	Arts
Bygones Torquay	Arts
Torquay Museum	Arts
Dame Agatha Christie CBE sculpture Torquay	Country Park
Agatha Christie's Extraordinary Life - ERBID Tour	Experience
South West Coast Path	Experience
Torquay's Dinosaur World	Experience
English Riviera Wheel	Experience
Torquay Watersports	Experience
Potent Plants Garden - Torre Abbey	Garden
Torre Abbey	Historic Property
Beaton Fishacre	Historic Property
Babbacombe Model Village	Leisure
Brixham Harbour & Marina	Leisure
Paignton Harbour	Leisure
Splashdown Quaywest	Leisure
Dartmouth Day Cruise	Transport
Babbacombe Cliff Railway	Transport

Figure 33. Experiences by Type



1. Of the 163 visitor attractions only a third or so are likely to be driving significant visits, either because they are previously known or because they are discovered as part of the trip planning process.
2. All visitor attractions have been categorised into their strategic importance with the Top 24 in Table 8 being seen to be the fundamental part of the offer.
3. There will be significant benefit in working with these attractions together with the 25 beaches which potentially could be classified and zoned with different sports and activities taking place as appropriate.

Table 9. Torbay's 25 Beaches

Ansteys Cove	Maidencombe
Babbacombe	Man Sands
Beacon Cove	Meadfoot
Breakwater	Oddicombe
Broadsands Paignton	Oyster Cove
Churston Cove	Paignton Sands
Corbyn Sands/ Head	Preston Sands Paignton
Elberry Cove	Saltern Cove Paignton
Fairy Cove	Shoalstone
Fishcombe Cove	St Mary's Bay
Goodrington Sands	Torre Abbey Sands
Hollicombe Beach	Watcombe
Livermead	

Table 11. Visitor Attractions Distribution by Place

	#	%
Brixham	36	22%
Paignton	41	25%
Torquay	73	45%
Other	13	8%

Table 12 . # Experiences Developed

Torbay	20.2%
Essex	33.5%
Peak District	35.6%

Table 10. Assessment Criteria

	Importance	Definition	#	%
1	Not at all important in strategic terms	This attraction is not going to influence visits to Torbay but may be interesting for some niche groups to stumble across	19	12%
2	Of below average importance in strategic terms	This attraction is not going to influence visits to Torbay but may be interesting for a broad set of visitors to find and enjoy	49	30%
3	Of average importance in strategic terms	Lkely to have been known about in advance and may have been a consideration at the booking stage or during pre-trip research or as part of a repeat visit.	45	28%
4	Of high importance in strategic terms	An important driver for Torbay leisure visits and /or will likely to have been part of the destination choice decision and pre-trip planning.	44	27%
5	Very important in strategic terms	This attraction drives huge numbers of leisure visitors to Torbay and can be considered a key attribute of the place	6	4%

Implications for Torbay – Visitor Attractions

- Table 12 shows that Experiences are not as developed as some other areas such as Derbyshire & The Peak District and Essex which both show appreciably more Experiences as a proportion of the total number of visitor attractions / activities. This may represent an opportunity area.
- As well as Experiences, there is a case for considering new visitor attractions that are intrinsic to the destination and can might be developed to attract new audiences and encourage repeat visits, for example attractions based on the Geopark designation or culture / the arts.

3.6 Visitor Experience & Service Quality

Table 13. Visitor Satisfaction Survey Results

SATISFACTION INDICATOR	2021	2022	2024	Trend	Potential Focus
Cleanliness of the streets	4.01	3.96	3.72	-0.29	AREAS FOR ACTION
Shopping - range	3.60	3.51	3.32	-0.28	
Upkeep of the parks & open spaces	4.39	4.34	4.22	-0.17	
Places to visit/attractions - value for money	3.91	3.82	3.77	-0.14	
Shopping - quality of service	3.97	3.88	3.85	-0.12	
Quality of the beaches	4.41	4.39	4.29	-0.12	
Parking - quality of service	3.44	3.40	3.32	-0.12	
Nightlife/evening entertainment - quality of service	3.90	3.88	3.79	-0.11	
Pedestrian signs	4.05	3.97	3.94	-0.11	
Places to visit/attractions - quality of service	4.17	4.14	4.06	-0.11	
Shopping - value for money	3.68	3.60	3.57	-0.11	WATCH OUT AREAS
Parking - ease of parking	3.40	3.32	3.31	-0.09	
Overall impression of the English Riviera in terms of feeling of welcome	4.42	4.36	4.33	-0.09	
Places to eat & drink - value for money	3.86	3.78	3.78	-0.08	
Overall impression of the English Riviera in terms of general atmosphere	4.44	4.42	4.37	-0.07	
Parking - value for money	3.03	3.03	2.96	-0.07	
Places to eat & drink - quality of service	4.14	4.09	4.07	-0.07	
Public transport - quality of service	4.33	4.16	4.27	-0.06	
Nightlife/evening entertainment – range	3.79	3.84	3.73	-0.06	
Places to eat & drink – range	4.16	4.16	4.11	-0.05	
Road signs	4.19	4.11	4.15	-0.04	STATIC / IMPROVING AREAS
Overall enjoyment of your visit	4.63	4.60	4.59	-0.04	
Places to visit/attractions – range	4.28	4.33	4.26	-0.02	
Display maps & information boards	3.92	3.89	3.90	-0.02	
Nightlife/evening entertainment - value for money	3.71	3.66	3.69	-0.02	
Public transport - value for money	4.18	4.06	4.17	-0.01	
Accommodation - value for money	4.24	4.23	4.28	0.04	
Accommodation - quality of service	4.55	4.52	4.63	0.08	

Source – Table re-presented from The English Riviera Visitor Survey 2024 by the South West Research Company published March 2025, pg. 71 – Visitor Satisfaction categories and scores 2021, 2022 & 2024.

Implications for Torbay - Visitor Experience & Service Quality

- The decline in visitor satisfaction needs to be addressed firmly and as a priority. Partners should consider prioritising and resourcing place-related actions that upgrade the quality of key elements of the product, particularly the clean, safe and legal elements.
- Putting in place common branding /upgrading of shopfronts across the three town centres should also be considered to improve ambience and quality.
- While investment is improving key areas, a focus that looks again at the visitor journey and public realm management and operational priorities will help lift what is one of the UK’s foremost leisure destinations.

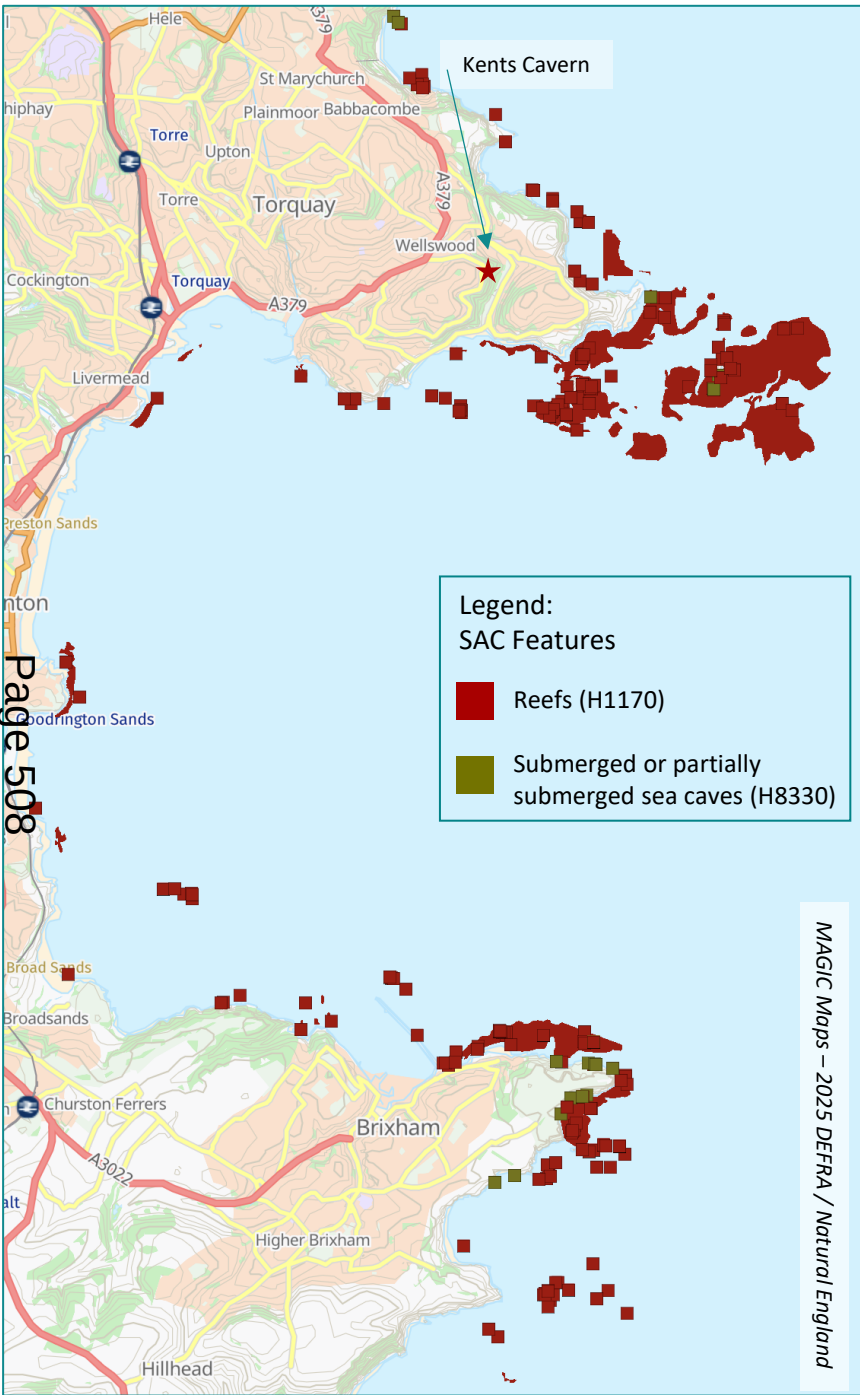
1. Table 13 shows the changes to visitor satisfaction between 2021 to 2024, derived from the visitor survey scores using a Likert scale of between 1 and 5 where visitors scored various satisfaction indicators. Small movements using such a scale accurately reflect longer term trends and in Torbay’s case reflect a reduction in visitor satisfaction over time. Worryingly most trends are downwards with concerns raised about key elements of the current product and experience.
3. The relative change (the ‘Trend’ column) is showing decline in key elements of the service offer, and despite the score being relatively high for some elements, their relative decline is a watch out. Areas like the decline in the range of the retail offer is not a surprise given wider trends but the reduction in cleanliness is within partners’ ability to address. Of the ten *Areas for Action*, half need to be progressed by the public sector. Of key importance are:
 - the cleanliness of the streets;
 - the upkeep of parks and open spaces; and
 - The quality of the beaches.
4. These areas have shown decline in satisfaction / quality over the three-year period. Areas like parking will normally be marked lower but there is watch out here too with the related quality of service measure. A combined and gradual decline may have influenced the overall impressions of atmosphere and enjoyment showed by the rows shaded yellow. This survey result is backed up by early responses to the current survey of businesses – see the word cloud - Figure 34.
6. Accommodation showed a net increase over 2021 in terms of both value for money and quality which is a credit to the sector across Torbay and something to be celebrated and built on.

Figure 34 – Interim Results – Business Survey 18.12.25



3.7 Habitats Regulations Assessment

Map 4. Torbay Special Areas of Conservation



This slide reflects a client request
References: Gov.UK (2021) <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>
Natural England (2018):
<https://designatedsites.naturalengland.org.uk/Marine/MarineFeatureConditionDirect.aspx?SiteCode=UK0030372&SiteName=Torbay&SiteNameDisplay=Lyme%20Bay%20and%20Torbay%20SAC&countyCode=11&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=>

1. Habitats Regulations protect key habitats and species and are usually designated as Special Areas of Conservation (SAC), Special Protection Areas or Ramsar sites. There is a general duty to protect conserve and restore such sites. Torbay has one Special Area of Conservation shown on the map which is marine based. It was designated in September 2017 as an inshore site and also includes a large area in Lyme Bay to the east. The area in Torbay is also protected under the UNESCO Global Geopark designation.
2. The SAC is composed of reef and cave habitat with the reef exhibiting geological variety supporting a number of reef features. The caves lie at various levels above and below the high-water mark and occur in several different rock types. The main threat to the site is seen to be from fishing activity. While this is one site, the general principle for many areas is that nature needs greater focus to turn around current decline and recovery will be via a systemic change in approach, strong local partnerships and increased investment.
3. Reflecting the importance of the destination's geology, Kents Cavern is one of the most important sites in the English Riviera Geopark and is graded by TripAdvisor as #1 visitor attraction in the area with 94% visitors seeing it as either Excellent or Very Good. It is notable both for its archaeological and geological features. The cave system has been a geological Site of Special Scientific Interest since 1952 and a Scheduled Ancient Monument since 1957. Kent's Cavern is one of the most strategically important visitor attractions as identified earlier in this document.
4. Water-based activities such as stand-up paddle boarding, scuba diving and snorkelling are growing in popularity and can be promoted as part of the wider geopark and encouraged within the SAC subject to the activities being managed in a way that reduces any negative impacts.
5. A Habitats Regulations Assessment is needed to test if a plan or project proposal could significantly harm the designated features of a SAC. The onus is on the 'competent authority' to undertake such an assessment, in this case Torbay Council.

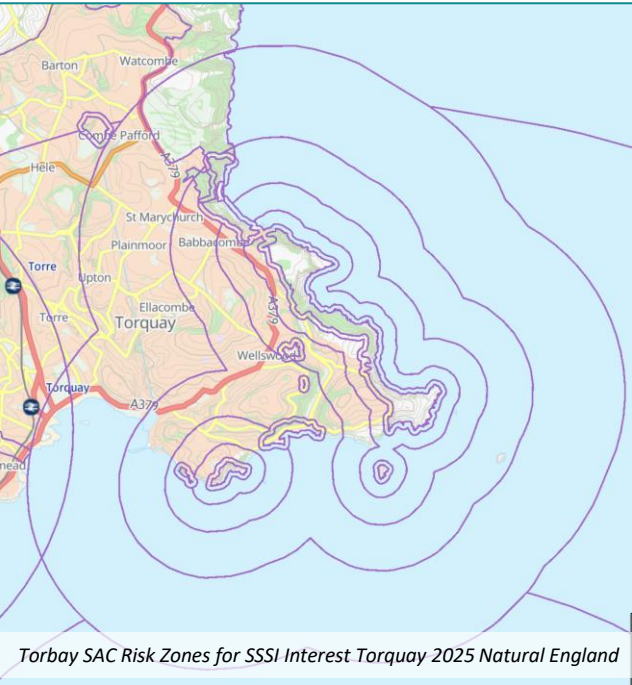
Does the new Destination Management Plan need an HRA?

6. The Destination Management Plan will set out ways in which Torbay's visitor economy can be grown over the next decade. While it is not a statutory plan it is likely to have impacts, particularly in terms of built development proposals, but these will also be subject to the planning process that considers wider issues such as environmental impact assessment. Typically, site-specific proposals may be subject to HRAs based on their likely impact on air, water or noise pollution as seen in the Risk Zones highlighted for Torquay in the map below.
7. The Destination Management Plan however will not contain site-specific development proposals and is not a statutory requirement in itself, so may not fall within the definition of a Plan or a Project as defined by the Conservation of Habitats and Species Regulations 2017. It is advised to discuss this further with Natural England in the first instance and to potentially undertake a preliminary screening process to inform those discussions.

Implications for Torbay

Develop a comprehensive overview of all Geopark assets in Torbay in order to be able to both protect this unique heritage and develop the leisure and tourism opportunities inherent within the destinations.

Map 5. Torbay SAC Risk Zones



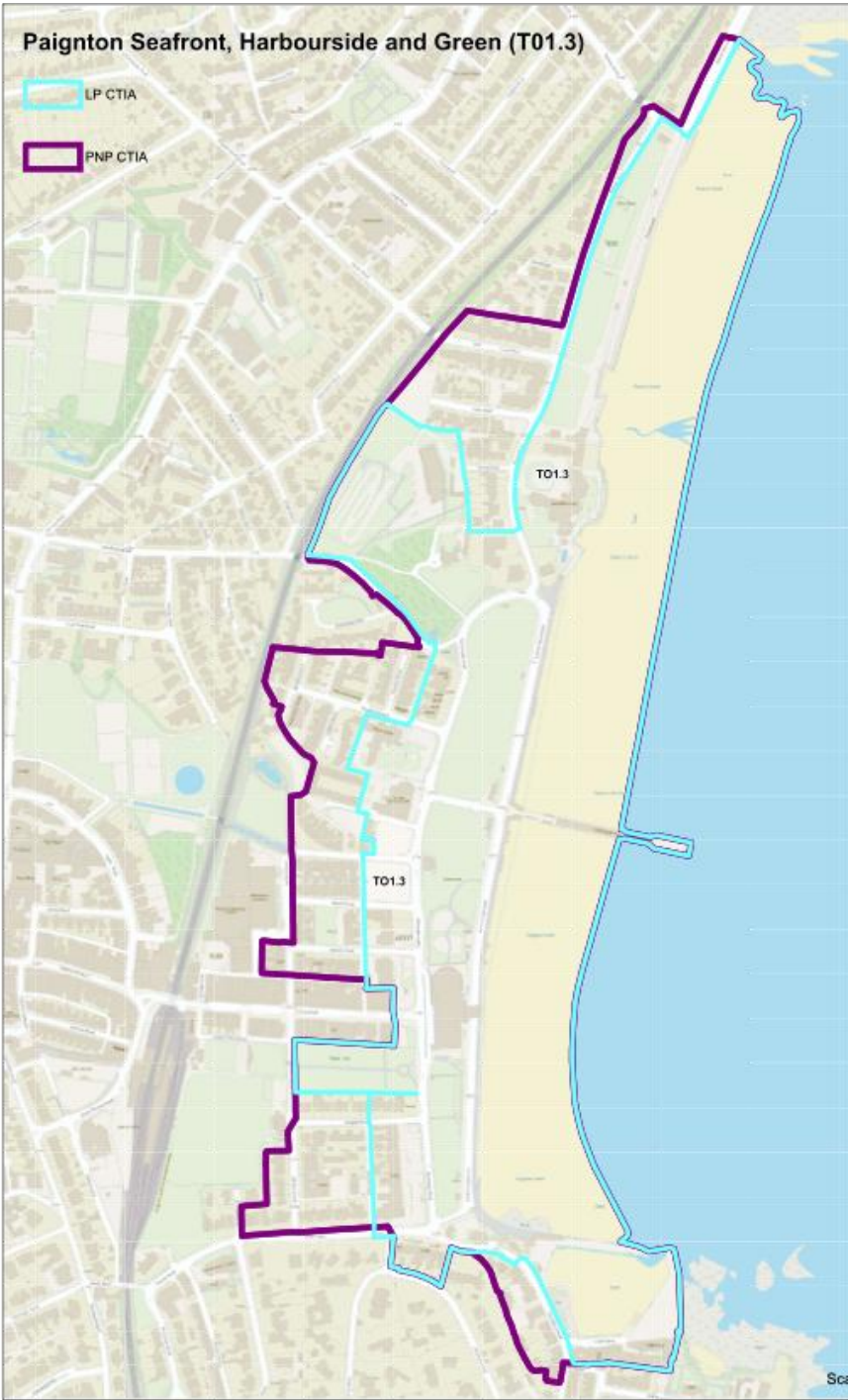
Torbay SAC Risk Zones for SSSI Interest Torquay 2025 Natural England

3.8 Torbay Local Plan Update: Core Tourism Investment Areas (CTIA)

Key points from the Local Plan update on CTIA's, Jan 2025

- Page 509
1. The previous Plan recommended a 2% reduction in serviced accommodation: about 300 bedspaces. Since then, there have been the following new developments: Hampton and Premier Inn in Torquay; Mercure (161 rooms) and Ibis (121 rooms), hotel Indigo in Paignton. Plus, the refurbishment of the Redcliff Hotel.
 2. Change of use from holiday accommodation is not strictly prevented but require a “reasonable prospect test.” Historical environment and market viability are crucial factors. Hotels are often costly to convert for non-tourism uses, making it financially attractive to let rooms to non-tourists.
 3. Requirements for Change of Use: When change of use from tourism is permitted, there will be a requirement to restore or enhance buildings or land.
 4. There has been discussion on potentially reducing CTIA areas or focusing solely on waterfronts. Proposal for a more flexible approach to residential use in key areas, subject to proper conversions. Relaxation of “reasonable prospect test” to emphasise positive regeneration.
 5. Tourism Regeneration Areas: Designation of specific areas for focused tourism investment with relaxed controls. Addressing “Agent of Change” issues to promote harmonious coexistence between residents and tourists.
 6. In Core Tourism Investment Areas (CTIAs), retention and enhancement of tourism supply is prioritised. Change of use to non-holiday purposes is allowed if facilities lack improvement potential or if it contributes positively to regeneration. Non-tourism developments must align with the tourism character of the area.
 7. Outside CTIAs, change of use from holiday accommodation is permitted if the holiday character and range of facilities are not undermined. The site has limited significance regarding holiday settings, views, or relationships with tourism facilities. The redevelopment or change of use provides regeneration benefits that outweigh the loss of holiday accommodations.
 8. Inside and outside CTIAs, proposals for small apartments, hostels, and houses in multiple occupation (HMOs) will not be allowed if they conflict with the tourism character of the Bay. Any increase in deprivation or incompatible uses will also be rejected.

Map 6
Paignton Seafront, Harbourside and Green Coastal Park CTIA



Source: Torbay Council, Torbay Local Plan Update: Core Tourism Investment Areas January 2025

1. There is a clear policy in place with new branded hotels revitalising the offer and adding vital improvement to current stock. Continuation of this strategy is recommended.
2. At the same time there will be a range of typical guest house and B&B accommodation where owners will be seeking to retire which should be facilitated – possibly by increasing the bedspace reduction target over the next 5 years, which reflects the increase in supply brought in by properties using the Sharing Economy as well as general growth.
3. Figures 1 to 6 on page 6 show the pressure on staying visitor demand over the period 2006 – 19 and also later between 2021 – 23. These figures are not comparable. While Torbay still gets greater volume than other parts of Devon there is a much more competitive market in place which demands continued new and significant investment from both public and private sectors. Staying visitors should be the priority in the new DMP.
4. The domestic tourism landscape is likely to be difficult for the next two to three years necessitating a very targeted marketing strategy to stay in the same place in terms of visitor numbers. From 2028, growth is likely to return with some key drivers, such as climate change, that can help Torbay to grow its core markets, such as older visitors, who will be increasingly less likely to visit southern Europe.
5. There are clearly some very good accommodation providers across Torbay who would welcome support to grow their business further through productivity gains via digitalisation, improvements to service quality, sustainability, accessibility and other drivers that can increase profitability.

Implications for Torbay

- Continue to facilitate the change of use of older stock to residential use. Consult on increasing the bedspace reduction target from 2% to include ranges of 2.5%, 5%, and 7.5%.
- Consider a dedicated and highly selective programme of Business Support for high growth accommodation providers in the Tourism Economy to digitalise and improve productivity and profitability.

4. Review of the Existing DMP

What the DMP Set Out to Achieve

“The Destination Management Plan sets out the priority actions and delivery tasks that can help the destination succeed”¹

Objectives for the life of the plan were:

- **Recover** – return to 2019 spend and visitor levels by 2024
- **Grow** – achieve an additional £75m of tourism spend and 1,500 new FTE jobs by 2030
- **Re-balance** – more sustainable visits, with 40% of visits from October – March

Delivery Performance & KPIs Achieved

See Annex III for more detail.

- Page 510
1. Strong delivery where KPIs were clear and owned (e.g. Seafood Feast, marketing activity, surveys, events, Meet English Riviera).
 2. Events, food & drink, on/in the water activity and Geopark discovery experiences largely delivered or exceeded targets, often with good partner engagement.
 3. Marketing activity aligned well to DMP themes, with regular delivery despite some gaps in formal research and brand review.
 4. KPIs weakest where actions were exploratory, long-term or policy-led (e.g. town centre regeneration, planning policy, brand strategy review).
 5. Heavy reliance on narrative rather than quantitative data across many actions limits performance assessment.

What Worked, What Didn't

What Worked

- ✓ Clear, SMART KPIs (e.g. events, surveys, footfall, bookings). Partner-led delivery models (ERBIDCo, ERUGGp, Meet English Riviera). Existing market momentum (water sports growth, food reputation, UNESCO designation).
- ✓ Flexible adaptation of actions where the market was already responding (e.g. water sports hub).
- ✓ Clear outcomes and evaluation with positive honest feedback regarding the future data and progress being made.

What Didn't

- ✗ Actions without defined baselines or numeric targets. Baseline data is missing for some indicators, making it difficult to understand the degree of change achieved.
- ✗ Duplication across themes (food & drink, sustainability, Geopark storytelling), reducing clarity of purpose.
- ✗ Resource constraints limited new research, brand development and ambassador programmes. Evidence was not available for all actions, making it challenging to accurately assess performance against several KPIs.
- ✗ Monitoring challenges where responsibility was diffuse or data was not routinely captured.
- ✗ Some KPIs appear insufficiently ambitious, reducing their effectiveness as drivers of meaningful progress.

Implications for Torbay

Continue

- Signature events (Seafood Feast, major water sports events).
- Annual surveys and performance reviews
- Partner-led delivery through DMG, ERBIDCo and ERUGGp.
- Integration of sustainability and Geopark narratives into experiences.

Adapt

- KPIs: move from narrative to fewer, clearer, measurable indicators and allocate required investment
- Geopark actions: align explicitly to the Geopark Management Plan to avoid duplication.
- Marketing KPIs: balance storytelling with headline metrics (reach, conversion, spend).

Stop

- Actions that duplicate existing programmes without adding value.
- KPIs that cannot realistically be monitored or attributed.
- Standalone actions that would work better as combined e.g. sustainability or skills strands.

Start

- Rationalising actions into fewer, outcome-focused priorities.
- Developing clearer baselines data for skills, sustainability and business engagement.

1. Source: <https://www.torbay.gov.uk/council/policies/economic-regeneration/dmp/dmp-vision/>

Annexes

I. Employment in the Visitor Economy

Page 512

ONS Crown Copyright Reserved [from Nomis on 5 December 2025] - Employment Estimates within the Formal Visitor Economy 2024			
Open access	Unmodulated	Visitor Weighting Factor %	Direct Jobs
Industry Code			TT Estimate
55100 : Hotels and similar accommodation	2,250	100%	2,250
55201 : Holiday centres and villages	150	100%	150
55202 : Youth hostels	0	100%	0
55209 : Other holiday and other short-stay accommodation	50	100%	50
55300 : Camping grounds, recreational vehicle parks and trailer parks	400	100%	400
55900 : Other accommodation	20	100%	20
56101 : Licensed restaurants	1,500	20%	300
56102 : Unlicensed restaurants and cafes	800	20%	160
56103 : Take away food shops and mobile food stands	800	20%	160
56210 : Event catering activities	45	20%	9
56290 : Other food service activities	400	20%	80
56301 : Licensed clubs	250	20%	50
56302 : Public houses and bars	1,250	20%	250
49100 : Passenger rail transport, interurban	10	50%	5
49311 : Urban, suburban or metropolitan area passenger railway transportation by underground, metro and similar systems	0	20%	0
49319 : Urban, suburban or metropolitan area passenger land transport other than railway transportation by underground, metro and similar systems	200	20%	40
49320 : Taxi operation	100	50%	50
49390 : Other passenger land transport nec	50	20%	10
50100 : Sea and coastal passenger water transport	15	50%	8
50300 : Inland passenger water transport	0	50%	0
51101 : Scheduled passenger air transport	0	50%	0
51102 : Non-scheduled passenger air transport	0	50%	0
77110 : Renting and leasing of cars and light motor vehicles	50	50%	25
77210 : Renting and leasing of recreational and sports goods	0	50%	0
77341 : Renting and leasing of passenger water transport equipment	0	50%	0
77351 : Renting and leasing of passenger air transport equipment	0	50%	0
79110 : Travel agency activities	50	100%	50
79120 : Tour operator activities	0	100%	0
79901 : Activities of tourist guides	0	100%	0
79909 : Other reservation service activities (not including activities of tourist guides)	40	100%	40
68202 : Letting and operating of conference and exhibition centres	0	100%	0
82301 : Activities of exhibition and fair organizers	30	100%	30
82302 : Activities of conference organizers	0	100%	0
90010 : Performing arts	100	20%	20
90020 : Support activities to performing arts	5	20%	1
90030 : Artistic creation	15	20%	3
90040 : Operation of arts facilities	0	20%	0
91020 : Museum activities	10	100%	10
91030 : Operation of historical sites and buildings and similar visitor attractions	10	100%	10
91040 : Botanical and zoological gardens and nature reserve activities	250	100%	250
93210 : Activities of amusement parks and theme parks	35	100%	35
93290 : Other amusement and recreation activities	150	50%	75
92000 : Gambling and betting activities	150	20%	30
93110 : Operation of sports facilities	250	20%	50
93199 : Other sports activities (not including activities of racehorse owners)	10	20%	2
Column Total	9,445		4,623
		FTE Total	2,126

1. The table shows the SIC codes relating to the visitor economy, together with a weighting, that derive the direct jobs figures presented on Page 14.

II. Policy Maps and Detailed Evidence

Torbay / English Riviera Documents			
Date Created / Published	Title	Alignment	URL
Policy & Strategy Documents			
Tourism or Visitor Economy Strategies or Plans			
2025	ERBID Consultation Document 2027-2031	- Places the visitor economy at the heart of Torbay's future and committing to sustained, strategic investment in destination marketing, product development and partnership working. - It supports the DMP's ambition to re-establish the English Riviera as a leading coastal destination by driving higher-value, year-round tourism, strengthening the brand, and ensuring activity is informed by data and market insight. Both frameworks emphasise sustainability, accessibility, collaboration and innovation, with the DMP setting the long-term strategic direction and the ERBID providing the practical funding and delivery mechanism needed to achieve a more competitive, resilient and well-managed visitor economy.	PDF ONLY
Other economic development-related plans			
2022	Torbay Economic Growth Strategy 2022-2030	- Recognises the visitor economy as a core pillar of Torbay's prosperity and creating the wider conditions needed for its success. It supports the DMP through commitments to infrastructure and town-centre improvements, skills development, business innovation, sustainability and place-brand enhancement. - The Economic Growth Strategy offers a broad economic framework—ensuring investment, planning and regeneration activity reinforce and enable a more competitive, resilient and high-value visitor economy for the English Riviera.	https://www.torbay.gov.uk/council/policies/economic-regeneration/economic-growth-strategy/
Leisure, recreation and/or tourism-led regeneration projects			
2025	Torbay Food Strategy 2025-2030	- Enhances one of the destination's most influential visitor touchpoints—its food culture. It supports the DMP's goals by improving product quality, strengthening sustainability, promoting community wellbeing, reinforcing place identity and elevating the visitor experience. - By fostering resilient local supply chains, supporting hospitality businesses and encouraging food-led events and experiences, the Food Strategy contributes directly to a more competitive, sustainable and vibrant visitor economy that mirrors the DMP's long-term vision for the English Riviera.	https://www.torbay.gov.uk/council/policies/health/torbay-food-strategy-202530/
2021	English Riviera (Outdoor) Events Strategy 2021-2027	- Uses high-quality, well-managed outdoor events to strengthen the visitor experience, animate the destination, and drive sustainable economic growth. Both strategies prioritise enhancing Torbay's distinctiveness, improving product development, and creating a vibrant year-round offer that boosts demand and supports local businesses. - The Events Strategy directly supports the DMP's ambitions for resilience, inclusivity, accessibility and sustainability by encouraging collaborative delivery, activating public spaces, extending the season, and attracting diverse audiences. Together, they reinforce the English Riviera's positioning as a dynamic, competitive coastal destination and contribute to a stronger, more resilient visitor economy.	https://www.torbay.gov.uk/democraticservices/documents/s112183/Events%20Strategy%20Appendix.pdf
2020	Torbay Heritage Strategy 2021-2026, Part 1 - Adopted	- Positions Torbay's rich heritage assets as key drivers of a distinctive, high-quality visitor experience and engines of sustainable economic growth. Emphasises the importance of enhancing the destination's unique identity, developing compelling products, and improving the overall sense of place to attract diverse audiences and strengthen Torbay's competitive edge. - Supports the DMP's focus on resilience, inclusivity and community benefit by promoting conservation, interpretation, and greater public engagement with heritage, while encouraging collaboration across cultural, tourism and community partners. By elevating heritage as a cornerstone of the English Riviera's offer, the strategy directly contributes to a vibrant, sustainable visitor economy and reinforces the long-term vision set out in the DMP.	https://www.torbay.gov.uk/council/policies/planning-policies/local-plan/torbay-heritage-strategy/
2020	Torbay Heritage Strategy 2021-2026, Part 2 - Adopted	- Translates Torbay's heritage ambitions into practical actions that strengthen the visitor experience, enrich the destination's identity, and support sustainable economic growth. - While the DMP emphasises product development, distinctiveness, partnership working and wise growth, Part 2 of the Heritage Strategy delivers these through targeted projects that improve access, interpretation and the quality of heritage sites; foster collaboration across cultural and tourism partners; and activate heritage as a year-round asset that attracts diverse audiences. - By enhancing the authenticity, vibrancy and resilience of Torbay's cultural offer, the strategy reinforces the DMP's goals of creating a compelling, high-quality coastal destination that benefits both visitors and local communities, bolstering the wider visitor economy.	https://www.torbay.gov.uk/council/policies/planning-policies/local-plan/torbay-heritage-strategy/

Other relevant documents			
2023	Geopark Management Plan 2023-2033 Part 1	- Positions the UNESCO Global Geopark as a cornerstone of the English Riviera’s distinctiveness, sustainability and long-term visitor appeal. - The plan prioritises the visitor economy by protecting and enhancing Torbay’s internationally significant natural heritage, improving interpretation, access and educational value, and fostering high-quality, low-impact experiences that resonate with modern traveller expectations—directly supporting the DMP’s focus on sustainability, resilience, inclusivity and product development. - Through strong partnership working, community engagement and an emphasis on responsible stewardship, the Geopark plan reinforces the DMP’s ambition to create a vibrant, well-managed coastal destination where natural heritage, visitor experiences and local benefit are balanced and mutually reinforcing, ultimately strengthening the area’s competitiveness and the wider visitor economy.	https://www.englishrivierageopark.org.uk/documents/Geopark_ManPlan_2023_Pt1_FINAL_Low_Res_23_03_13.pdf
2023	Geopark Management Plan 2023-2033 Part 2	- Interprets the Geopark’s strategic ambitions into practical actions that enhance Torbay’s natural heritage offer, enrich visitor understanding, and support sustainable growth of the visitor economy. - Through targeted projects focused on interpretation, conservation, access improvements, education, community engagement and responsible tourism, Part 2 strengthens the quality and distinctiveness of the visitor experience—key priorities of the DMP. Its emphasis on sustainability, inclusivity and partnership mirrors the DMP’s commitment to wise growth, collaborative delivery and resilience, ensuring the UNESCO Global Geopark remains both a protected landscape and a vibrant, year-round asset that underpins Torbay’s identity and competitiveness as a leading coastal destination.	https://www.englishrivierageopark.org.uk/documents/Geopark_ManPlan_2023_Pt2_FINAL_Low_Res_23_03_13.pdf
2023	Community and Corporate Plan 2023-2043	- Sets the long-term conditions that enable a thriving, resilient and high-quality visitor economy. Provides a broad framework for creating a prosperous, welcoming and well-managed Torbay. Its priorities—such as improving infrastructure, fostering community wellbeing, promoting sustainable development, strengthening partnerships and building economic resilience—directly support the DMP’s ambitions for wise growth, inclusivity, accessibility and a vibrant place to live, work and visit. - By prioritising a cleaner, safer, more connected and more confident Torbay, the plan underpins the DMP’s vision for a competitive coastal destination with a strong visitor economy that delivers long-term benefits for residents, businesses and communities.	https://www.torbay.gov.uk/council/policies/corporate/corporate-plan/
2023	Greener Way for Our Bay	- Places sustainability, environmental stewardship and climate resilience at the heart of Torbay’s long-term prosperity—principles that directly support a high-quality, future-proofed visitor economy. - By focusing on carbon reduction, biodiversity, coastal protection and improved access to green spaces, it supports the DMP’s goals of wise growth, high-quality visitor experiences and responsible destination management. It ensures Torbay’s natural assets are protected, attractive and resilient, helping secure a competitive, sustainable and appealing coastal destination for both visitors and residents.	https://www.torbay.gov.uk/council/greener-way-for-our-bay/
Best Practice Examples			
2025	Torbay Story Toolkit (BEST PRACTICE)	- Strengthens the English Riviera’s identity, narrative and market positioning—core elements of a competitive visitor economy. - By providing a unified story, visual language and messaging framework for partners, the Toolkit enhances destination branding, supports consistent promotion and helps showcase Torbay’s strengths, character and ambition. This directly reinforces the DMP’s priorities around improving marketing impact, celebrating distinctiveness, inspiring collaboration and attracting diverse audiences. Together, they ensure Torbay presents a compelling, cohesive and confident identity that elevates the visitor experience and supports sustainable growth across the wider destination.	https://torbaystory.co.uk/toolkit

South West Focus Documents			
Date Created / Published	Title	Alignment	URL
Policy & Strategy Documents			
Tourism or Visitor Economy Strategies or Plans			
2025	Devon & Partners LVEP Growth Plan (2025-2026) Core Early Priorities Identified in the Destination Management Framework (DMF)	- Focuses on priorities that strengthen coordination, enhance destination competitiveness and support sustainable growth across the region's visitor economy. - Its emphasis on improving data and insights, streamlining governance, developing high-quality visitor products, and boosting regional marketing impact directly reflects the DMP's priorities around evidence-led planning, collaboration, product development and wise growth. - By promoting accessibility, sustainability and stronger partnerships between local, regional and national bodies, the LVEP Growth Plan reinforces the DMP's vision of a well-managed, resilient and distinctive English Riviera that benefits both visitors and the wider community.	https://www.visitdevon.co.uk/devon-and-partners-lvep/devon-and-partners-lvep-growth-plan/growth-plan-2025-2028/
2024 Page 515	Towards 2030 Working Together to build a stronger visitor economy in the South West - The Great South West Tourism Partnership Prospectus	- Champions a coordinated, strategic approach to strengthening the region's visitor economy—directly supporting the DMP's ambition for a more competitive, resilient and sustainable English Riviera. - The Prospectus prioritises regional collaboration, investment in skills, infrastructure and sustainable tourism, and a stronger, more unified voice for the South West—actions that complement the DMP's focus on data-driven decision-making, product development, accessibility, partnership working and wise growth. By advocating for shared priorities and increased national recognition and funding, the Prospectus reinforces the DMP's goals and helps create the wider conditions needed for Torbay to thrive as a leading coastal destination.	PDF ONLY
Other relevant documents			
2025	Devon and Torbay Local Growth Plan	- Recognises the visitor economy as a key driver of local prosperity and sets out the broader economic conditions needed for a thriving, competitive English Riviera. - Its focus on improving infrastructure, skills, business support, sustainability, and place-making, directly complements the DMP's priorities around enhancing the visitor experience, strengthening destination identity, fostering wise growth, and ensuring coordinated delivery across partners. - By supporting investment, promoting innovation and enabling resilient, inclusive economic development, the Local Growth Plan reinforces the DMP's ambition to create a vibrant, well-managed coastal destination where tourism contributes meaningfully to long-term community and economic wellbeing.	https://democracy.devon.gov.uk/documents/s51923/Devon%20and%20Torbay%20LGP%20-%20Appendix%201%20-%20Draft%20-%20FINAL%201.pdf

III. Review of Existing DMP

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Destination Development – Growth Priority Theme 1: Food and Drink						
High Level Action	Detailed Actions	KPIs	Lead Partner	Supporting Partners	Comments on Actions	Comments on KPIs
1. Sustainable Food and Drink Destination	Revive the ERBID food and drink focus group, explore options to work with the Devon Food Partnership and Sustainable Food Place award.	Food & drink focus group revived & 1 meeting held	ERBIDCo	Private Sector ERUGGp Torbay Council	Torbay has achieved the Sustainable Food Place award as part of a wider piece of work led by LocalMotion Torbay.	KPIs with this action are mostly aligned with the Seafood FEAST leading to duplication. Actions have been achieved, but changes with organisations presents a challenge with capturing data on sustainable practices in Torbay. Could be an opportunity to develop this with more focus to increase these opportunities.
	Focus on initiatives to promote local producers/ businesses to ‘taste the English Riviera and UNESCO Global Geopark, reduce food waste, sustainability and improve local supply chains. Develop appropriate support tools for businesses.	1 initiative			Aligned with the Seafood Feast	Also aligned with the Torbay Sustainable Food Places Award. Data is mostly narrative and is likely not to be provided moving forward.
	Increase food and drink experiences, including pop ups, try me, making, tasting and cookery experiences	10 new food experiences introduced			Aligned to the Seafood Feast Some overlap with previous and next actions	Also aligned with the Torbay Sustainable Food Places Award. Data is mostly narrative and is likely not to be provided moving forward.
2. Relaunch Seafood Feast as a signature event	The September food event should become a signature event in the destination calendar. Increase annual visitor footfall, overnight stays and spend.	1 event 10 new food experiences 20 venues taking part	ERBIDCo	Private Sector Torbay Council	Event continues to be popular and promotes food and drink within the area.	KPIs exceeded. The KPI is SMART, and data is supplied through ERBID. The question is whether this action is located in the right space or whether it should be associated with Culture and Events?
3. Inspiring Dining	Enable inspiring dining spaces through mixed use town centre regeneration projects to create special and unique places to eat and drink with a focus on quality and local.	Linked to Town’s Fund	Torbay Council	Private Sector	Activity not started.	This KPI is challenging to monitor as activity has yet to take place and so no KPI has been associated with it. Data supplied is around the progress of the activity taking place and ensuring that consideration is taken place with regards to the visitor economy.

DMP Review Process:

- 1. Initial review conducted by Tomorrow’s Tourism.
- 2. Review comments provided to Elizabeth Devonport, Torbay Council.
- 3. Additional comments submitted by ED.
- 4. Final review incorporates ED comments, alongside relevant feedback from Tomorrow’s Tourism shown in shaded columns entitled ‘Comments on Actions’ and ‘Comments on KPIs’

Each Action has been given a status update by Torbay Council to understand the progress of the activity, using the following descriptions:

- Green – On Target (in play and achieving targets)
- Amber – Behind Target, but Still Achievable (may not achieve this quarters targets but should achieve annual targets)
- Red – Behind Target and At Risk (unlikely or unable to achieve targets)
- Grey – Not Applicable (Activity has not started yet / Will not start this year)

Destination Development – Growth Priority Theme 2: On and In the Water						
High Level Action	Detailed Actions	KPIs	Lead Partner	Supporting Partners	Comments on Actions	Comments on KPIs
4. Water sports Hub Development	Ensure new facilities and sports events are sustainable with a low carbon impact and interpret the Geopark and align to the Torbay Story messaging.	Action plan for delivery (to be scoped).	Torbay Council	Tor Bay Harbour Authority, TDA, ERUGGp	The original action was reviewed - the market has responded to the water sport activity opportunities in Torbay sufficiently (organisations are already looking to develop a water sports hub). Focus was shifted to provide support and encourage and promote the offer available. It is proposed to remove this action.	Action shifted to supporting businesses as a main point of enquiry especially with the SUPHub work. Other activity occurring across the Council with regards to the Blue Economy so it would be good to review this in relation to Torbay on the Move and future work to support alignment.
5. Business Development	Enable on and in the water/water sports development by supporting businesses to establish themselves and grow. Alignment to Carbon Neutral Torbay and UNESCO Global Geopark.	No. businesses supported (to be scoped)	Torbay Council	Private Sector	Business support available to all businesses. An innovation event supported the start of the SUPHUB group combining businesses with local organisations and people to make Torbay the SUP capital of the UK. Action reviewed by chair of DMG and Torbay Council– suggestion to change this action to “Encourage and promote a wide offer of water sports activity in Torbay”	Activity has taken place despite no KPIs being identified. Data is being supplied, similar to one above (may wish to combine?).
6. Packaging On/In the Water Experiences	Develop ‘On and in the Water’ experiences for distribution through new and established channels.	3 new experiences introduced	ERBIDCo	Private Sector, Meet English Riviera	Torbay has hosted the ER SUP Championships and will be hosting the 2026 World Cup. On and In the water experiences have been included on the ER website.	This has been achieved and is easy to monitor through partner engagement, however, there is a question of whether we need new experience or to grow these events so they support businesses as there is lots of activity already taking place. Could be something to work with organisations and groups to capture more information on events and grow.

Destination Development – Growth Priority Theme 3: UNESCO Global Geopark						
High Level Action	Detailed Actions	KPIs	Lead Partner	Supporting Partners	Comments on Actions	Comments on KPIs
7. Geopark Interpretation	Aligning to the Torbay Heritage Strategy & Heritage Interpretation Framework.	Review of Strategies	ERUGGp	Torbay Council, ERBIDCo, Private Sector	Ongoing and aligned as per the Geopark 10-year Management Plan	More of an awareness piece which is continuously ongoing and already taking place. Partner provides updates so achievable with regards to data, but may not be needed as this is something they have ongoing responsibility for.
	Integrate UNESCO Global Geopark into more products, experiences, visitor information and support businesses with creative storytelling and visual branding.	Action plan for delivery No new products & experiences			Ongoing activity - ERUGGp discovery experiences have been created with businesses	Clearly lots of work being done, but unclear if there is a specific action plan for this (aligns well with the action plan in The Geopark Management Plan 2023-33 - Part 2). Activity has and is taking place with new experiences and products developed. No number was identified and this does align with a different action. Data supplied is proved from partners.
	Explore options to further engage with businesses to develop ideas, such as simple toolkits and workshops.	No businesses engaged			Something that is being developed through the terafirma project	KPI could evolve to also look at the number of toolkits/workshops created/undertaken. Baseline number of businesses to provide target/monitoring.
	Explore developing Geopark Ambassadors to help tell the story of the Geopark while supporting the visitor welcome.	2 business ambassadors			Something which is being explored as part of the terafirma project. Latest update: Ambassadors scheme for community volunteers currently on hold without resources to manage it	This action has taken place with businesses engaging and becoming partners/associate partners over the last couple of years. Questions could be raised on the KPI to be higher or look at what these businesses are doing to support the Geopark. This could be fed back by Partner if agreed.
8. Digital Geopark Trails	Develop options and implement digital trails for use on mobile devices with integrated interpretation.	1 project plan created	ERUGGp	ERBIDCo	Developed as part of the ERUGGp Discovery Experiences	Project has been undertaken with a couple of digital trails available online as well as a series of other discovery experiences. The launch of the Geopark Discovery Trails replaced plans for the original digital trails. Data is available on the number of the discovery experiences, but if we could collect more data on the information, that would be beneficial.
9. Designated Landscape Partnerships	Explore opportunities to work with other designated landscapes across the South West to promote the collection of unique landscapes and monuments.	Partnership established	ERUGGp		This activity is continuing to take place with ERUGGp being active within the Local to Global NLHF project and as part of the SW UNESCO group.	Activity is currently taking place with funding acquired to promote the South West designated landscapes. Partnership has been established, but the KPI doesn't demonstrate the development of the group - could be an opportunity here.

Destination Development – Growth Priority Theme 4: Culture and Events						
High Level Action	Detailed Actions	KPIs	Lead Partner	Supporting Partners	Comments on Actions	Comments on KPIs
10. Thematic Interventions	Undertake a critical appraisal of current programming against the aims of this DMP and the thematic framework to identify signature events across the three towns to strengthen the cultural offer to attract new visitors.	1 Critical appraisal completed	Torbay Council	ERBIDCo, Torbay Culture	A review of Torbay events takes place, with several key events established.	A review/critical appraisal of the activity each year is important (potentially change for annual review). Data is provided, but there could be opportunity to develop this further for the different events (topline numbers/figures/data captured for the different events or activities).

Destination Development – Marketing Task 1: Markets, Positioning and Branding						
High Level Action	Detailed Actions	KPIs	Lead Partner	Supporting Partners	Comments on Actions	Comments on KPIs
1. Market Research	Primary research among leisure visitor and non-visitors to explore current brand perceptions and associations, names, places, and straplines.	Market research completed	ERBIDCo	DMG	Marketing is aligned with the DMP target audiences and growth themes.	Some research has taken place, but wasn't something planned for the current year. KPI may need to expand/change with the idea that this can be developed.
2. Brand Strategy Review	Informed by the findings of the market research, engage stakeholders, review and update branding strategy and marketing assets.	Brand strategy review completed	ERBIDCo		Activity has yet to take place but current branding is available. Brand Strategy Review not yet undertaken due to lack of funding.	Some research has taken place, but wasn't something planned for the current year. KPI may need to expand/change with the idea that this can be developed.
	Consider producing brand toolkits for businesses to adopt. Reconfigure marketing collateral and channels accordingly.	Action plan for delivery			Toolkits have been developed and continue to be shared with businesses and through various channels.	
3. Marketing Strategy Review	Review the marketing strategy and update accordingly to the themes and target segments in the DMP. Review and refine messaging/activity where appropriate.	Market strategy review completed Action plan for delivery	ERBIDCo		Marketing is aligned to DMP themes and target audiences. Marketing Strategies produced 2023, 2024, new Marketing Agency appointed end 2024	Connects ERBID's marketing schemes with the DMP and helps with monitoring the ongoing progress. Data is supplied by partner. Narrative based rather than numbers.

Destination Development – Marketing Task 2: Destination Management						
Priority Task	Detailed Actions	KPIs	Lead Partner	Supporting Partners	Comments on Actions	Comments on KPIs
4. Policy Review	Review the Local Plan and prepare supplementary planning documents to assist in transition of redundant accommodation.	Review stock of serviced accommodation and update local plan including supplementary planning documents	Torbay Council		This hasn't taken place yet.	Useful KPI to understand business stock and other planning activity. Usable data is being supplied, but it would be beneficial to improve this.
5. Joint Response to Visitor Surveys	Undertake a review exercise across delivery teams to plan actions that address the findings of visitor surveys.	Review annual survey and create action plan	ERBIDCo	DMG, Torbay Council	Annual survey is reviewed and discussed at DMG. Feedback creates actions which are taken forward by the relevant partner.	The review of the annual survey is really beneficial, but there needs to be a movement to the use of the next steps. Data is being supplied through the DMG, but updates of next step should be included.
6. Public Realm Improvement	Further develop public realm improvement plans for visitor areas. Focus on Brixham Harbourside and Torquay Inner Harbour to complement and enhance improvements around the Strand.	No. public realm improvements delivering (review annually)	Torbay Council	Tor Bay Harbour Authority	Narrative is provided rather than number, but provides more information about the projects.	Beneficial with a series of public realm improvements currently developed and planned for the future. Data is being supplied - could be more quantifiable rather than qualitative.
7. Bus Network Improvement	Explore options to name the visitor routes and align to the Geopark story e.g. 'The English Riviera Route.'	Options appraisal completed. Action Plan for delivery.	Torbay Council	ERBIDCo, Transport Providers, ERUGGp	Updates provided from operational lead on the activity which is taking place	Aligns with other work around bus network improvements as well as branding alignment. Data is being supplied, KPI could be changed to be more aligned with the activity taken place. Also broadened to include transport networks as a whole (not just buses, but also trains etc.)
8. Cruise Development	Develop shore excursions and tailor-made experiences for cruise operators which relate to the development themes of this DMP.	No. new excursions	Tor Bay Harbour Authority	ERBIDCo	Narrative provided on this activity rather than no. new excursions focus has been on the number of cruises ships booked.	Data is being supplied, activity is taking place. Focus has been on the number of cruise ships coming in - could be that this is the KPI focus moving forward rather than excursions? Easier to track and monitor?
9. Green Tourism for business	Explore options and encourage businesses to achieve the Green Tourism Award (or other zero/carbon neutral programmes), aligning to Carbon Neutral Torbay, to showcase exemplars of good practice and supporting the overall reputation of the destination.	Options appraisal completed. Action plan for delivery created. No. Business engaged.	DMG	Torbay Council, Torbay Climate Partnership, ERUGGp, Private Sector, ERBIDCo, Torbay Place Leadership Board	This activity is taking place this year (25/26). Appraisal and action plan for delivery has been created.	Aligned with the following action - focus is on supporting businesses with becoming more sustainable and aligning with activity.
10. Carbon Neutral Torbay	Explore the options to align Carbon Neutral Torbay with the UNESCO Glasgow Declaration on Climate Change as a commitment to a more sustainable visitor economy.	To be scoped	DMG	Torbay Council, Torbay Climate Partnership, ERUGGp, Private Sector,	This activity aligns with the A Greener Way For Our Bay action plan. Aligned to action above with regards to delivery etc.	These actions could be combined to focus on one KPI with an underlying focus on sustainability moving forward. Data can be supplied, but not needed.

Destination Development – Marketing Task 2: Destination Management (continued)

Priority Task	Detailed Actions	KPIs	Lead Partner	Supporting Partners	Comments on Actions	Comments on KPIs
11. Education Business Plans for Tourism	Annual plan for business engagement in education supporting career pathways for young people.	No. business engaged & no. young people engaged in tourism related courses	SDC	Private Businesses	Often combined with the action below - numbers have been provided on the tourism courses.	Suggestion could be that these actions are combined into one or a series of skills actions. Data is being supplied with numbers and narrative. It would be good to evaluate these with skills providers and business needs to identify new KPIs which can be measured.
12. Workforce Skills	Annual plan to increase business engagement to improve the skills of the workforce (and the unemployed) through take up of programmes.	No. businesses engaged & no. people engaged in skills improvement programmes	SDC	Private Businesses, Torbay Council	Often combined with the action above - numbers have been provided.	See above
13. Annual Performance Review	Deliver a number of annual surveys to review destination performance.	Delivery of 2 surveys	ERBIDCo		Surveys are delivered on an annual basis and feedback is discussed by the DMG.	One survey for the annual review is beneficial and data is supplied, but it would be beneficial to look at how we use the survey.
14. Meet English Riviera	Develop activity to support conference sales and marketing activity over the life of the DMP.	£2M worth of Conference Bookings	Meet English Riviera		The value is over the life of the plan with currently value of enquiries around £5.8 million.	Focus could be on the value of enquiries rather than the amount of conference bookings (as this is easier to capture by partners). Other elements currently being captured is number of appointments, no. contracts made, estimated value overall and for Torbay.

Destination Development – Marketing Task 3: Delivery, Organisation and Resources

Priority Task	Detailed Actions	KPIs	Lead Partner	Supporting Partners	Comments on Actions	Comments on KPIs
15. DMG Terms of Reference and Annual Review	Includes terms of reference, membership, responsibilities for actions, progress monitoring via a data dashboard and resourcing plans.	ToR & Annual Review completed	Torbay Council	DMG	An annual report was created for the DMG to review alongside quarterly reports to review progress and update on activity. Discussion from the group usually shapes the focus of actions or the next quarter's discussion.	This KPI works as part of the governance, but should be reviewed with regards to future governance. The approach is simple and effective, but is there something more with regards to governance to ensure that delivery will be successful?

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Meeting: Cabinet

Date: 21 July 2026.

Wards affected: All

Report Title: Hackney Carriage Tariff Increase

Cabinet Member Contact Details: Councillor Tranter, Cabinet Member for Adult and Community Services, Public Health and Inequalities

Director Contact Details: Anna Coles, Director of Adults and Community Services

1. Purpose of Report

- 1.1 For the Cabinet to consider the review of the Taxi Table of Fares (Taxi Tariff), following a request to increase the Hackney Carriage fare tariff in Torbay from the Torbay Licensed Taxi Association (TLTA). Meetings have been held with the TLTA, Torquay United Licensed Driver Association (TULDA) and other hackney carriage representatives to agree this proposal.
- 1.2 For Cabinet to determine whether to accept the proposal detailed in the following report and send the proposal out for consultation as set out in the prescribed process under section 65 of the Local Government (Miscellaneous Provisions) Act 1976.

2. Reason for Proposal and its benefits

- 2.1 The Local Government (Miscellaneous Provisions) Act 1976, allows the Council to set the maximum level of charges to be levied by all Hackney Carriages operating under its control.

The Council does not have powers to set fares for journeys in private hire vehicles.
- 2.2 The setting of the Table of Fares (tariff) is an executive function of the Council.
- 2.3 The Tariff was last increased in October 2024.
- 2.4 The Table of Fares (Tariff) should be set to enable sustainable income for drivers, future investment in vehicles and to clearly set rates that minimise the opportunity for overcharging or confusion.

3. Recommendation(s) / Proposed Decision

- 3.1 That the Cabinet consider approving one of the following options:

- i) Option 1: The proposed amendments to the Tariff as set out in the submitted report be approved and the Director of Adults and Community Services be instructed to carry out the public consultation as set out in the prescribed process under section 65 of the Local Government (Miscellaneous Provisions) Act 1976.
- ii) Option 2: That the proposed amendments to the Tariff as set out in the submitted report be amended and the Director of Adults and Community Services be instructed to carry out the public consultation as set out in the prescribed process under section 65 of the Local Government (Miscellaneous Provisions) Act 1976.
- iii) Option 3: That the proposed amendments to the Tariff as set out in the submitted report be rejected.

Appendices

Appendix 1: Proposed Table of Fares (Tariff)

Appendix 2: Current Table of Fares (Tariff)

Appendix 3: Tariff setting methodology.

Appendix 4: Current Running Costs per Mile Calculations

Appendix 5: Table to show the proposed increase in costs to the travelling public for journeys up to 10 miles.

Appendix 6: AA Motoring Costs 2014

Background Documents

None

1. Introduction

- 1.1 The common term for Hackney Carriages is 'taxis' and this term is used throughout this report. A customer can flag down a taxi in the street or at taxi ranks without booking unlike private hire vehicles that must always be booked in advance of the journey.
- 1.2 Section 65 of the Local Government (Miscellaneous Provisions) Act 1976 (LGMPA76), allows the Council to set the maximum costs and fares that drivers may charge the public for journeys taken in a taxi. The Council does not have powers to set fares for journeys in private hire vehicles. Members should note that drivers may charge a lower fare or offer a discount if they wish and negotiate fares for travel outside of the district boundaries.
- 1.3 Taxi fares are made up of an initial hiring charge (flag fall) and a mileage rate, both of which are expressed in terms of distance and or time. This is because when a hired taxi is stationary or moving at less than 6mph in traffic the meter continues charging by time instead of distance. It can never charge both time and distance at the same time.
- 1.4 The Table of Fares (Tariff) should be set to enable sustainable income for drivers, future investment in vehicles, and to clearly set rates that minimise the opportunity for overcharging or confusion.
- 1.5 The Tariff has to be displayed within all taxis to allow passengers to calculate the approximate cost of their journey. Section 4 of Torbay Council's Hackney Carriage Byelaws requires taximeters to be fitted in every licensed hackney carriage vehicle, which are calibrated and sealed. Once set, all drivers must display the maximum fare on their taximeter. This ensures consistency across all taxis and provides public confidence that the fare they are charged is correct.
- 1.6 In accordance with the statutory procedure set out in Section 65 of the LGMPA76, should Members agree the proposed changes to the Tariff, the Council must then undertake a public consultation prior to making any amendment to the Tariff. A notice must be published in at least one local newspaper circulating in the areas setting out the variation and specifying the period, which cannot be less than 14 days from the date of the first publication of the notice, within which and the manner in which, objections can be made. If no objections to the variation of the Tariff are received, or if all objections are withdrawn, the revised Tariff will come into operation on the date of the expiration of the consultation period.

However, if any objections are made and not withdrawn, the Council will consider the objections and set a further date, not later than two months after the first specified date, on which the tariff shall come into force with or without further modifications.

- 1.7 Since the last review, the consumer price index (CPI), which represents inflation through the change in the cost of living, has eased. CPI rose by 2.8% in the 12 months to April 2026, down from 3.3% in the 12 months to March. On a monthly basis, CPI rose by 0.7% in April 2026, compared with a rise of 1.2% in April 2025. However there has been large increases in motor fuel prices.

Fuel prices over the next two years are expected to remain volatile and elevated with the tensions in the Middle East, keeping oil markets unstable.

Inflation has fallen significantly since it reached 11.1% in October 2022, which was the highest rate for 40 years. However, prices aren't falling, they are just rising less quickly.

Inflation has remained above the Bank of England's 2% target partly because of high energy and food prices.

The most up-to-date information obtained from the Office of National Statistics (Consumer price inflation, UK - Office for National Statistics) shows that:

- The CPI rose by 2.8% in the 12 months to April 2026, down from 3.3% in the 12 months to March.
- On a monthly basis, CPI rose by 0.7% in April 2026, compared with a rise of 1.2% in April 2025.

The price of fuel on 21 May 2026 rose to 159.1 for Petrol and 185.6 pence per litre for diesel. However, this is still lower than the peak in June 2022 which was at 191.1 for Petrol and 198.96 pence per litre of diesel (UK pump prices over time (racfoundation.org)). At the time of the last tariff review in October 2024, the prices on 4 October 2024, were 133.8 pence per litre for petrol and 138.4 pence per litre for diesel.

Therefore, the price has increased by 25.3 pence per litre of petrol and 47.2 pence per litre of diesel. Based on a 47-litre tank, this is an increase of £11.89 for a tank for petrol and £22.18 for diesel.

- 1.8 The methodology shown in Appendix 3, has been used to provide a transparent process for calculating taxi fares and seeks to measure the true costs of providing taxis and the 'cost per mile' figure necessary to safeguard the sustainability for this valuable public service. The information provided in this document is supported by factual evidence. If statistical data is not available, the calculations are based on reasoned argument. Appendix 4 shows the calculations for the current running costs per mile.
- 1.9 Section 10 of the Department for Transport Taxi and Private Hire Licensing Best Practice Guidance for Licensing Authorities states *'in reviewing fare rates, authorities should pay particular regard to the needs of the travelling public, with reference to both to what it is reasonable to expect people to pay but also to the need to give taxi drivers the ability to earn a sufficient income and so incentivise them to provide a service when it is needed. There is likely to be a case for higher tariffs at times of higher demand to encourage more drivers to make themselves available or when the journeys are required at anti-social times. To ensure that taxi tariffs reflect the costs of the trade, they should be reviewed following significant changes in licensing fees and other major costs such as fuel. Regular reviews will assist drivers in maintaining their earnings and so continue to attract those seeking to become taxi drivers and provide existing licensees with greater confidence to remain in the trade and plan for the future investment in new vehicles. Regular reviews will also avoid large changes in fares for passengers that infrequent reviews are more likely to result in'.*

2. Options under consideration

- 2.1 The proposed tariff is set out in Appendix 1. The current tariff can be found in Appendix 2.
- 2.2 Using the fee setting methodology shown in Appendix 3 and the calculations shown in Appendix 4, it can be seen that the current cost to operate a taxi in Torbay is calculated at £1.84 per mile. This is the basic cost to run a taxi; it only includes the earnable mileage so does not account for the dead mileage (when travelling to or returning from a fare).
- 2.3 Under the current Tariff 1, the running mile before any extras applied is set at £2.40 per mile. This does not include the initial charge (flag fall), any extras or waiting times. The proposed uplift would see the running mile costs remain at £2.40 for Tariff 1 and rise to £3 for Tariff 4 (5-8 passengers), however the current Tariff 1 allows drivers to charge 20p per additional passenger as extras. Therefore, this is the equivalent of an additional 3 passengers.

Tariffs 1 and 2 include a £0.60 increase to the initial charge, providing a clear uplift. Distance and waiting time rates for Tariffs 1 and 2 remain unchanged. Tariffs 3 and 4 reflect the higher operating costs associated with larger vehicles, with increased distance and waiting rates. The waiting time has been aligned with distance rates across all tariffs to ensure consistency. When compared against the current model using passenger extras, the revised Tariffs 3 and 4 provide a more consistent and, in many cases, comparable or improved return across typical journeys, particularly as the distance increases.

- 2.4 The proposed tariff by the TLTA, takes into account the cost of living and inflation and applies an average uplift to the Tariff 1 of an average of 4.6% and an average uplift of 3.8% for Tariff 2. The TLTA have requested that two additional tariffs are included for vehicles taking 5-8 passengers. This will assist with the costs involved with purchasing a larger vehicle and will make the fare clearer for passengers as no extras will be added per passenger. The passengers will only be charged for the Tariff 3 and 4 where the passenger numbers are 5 or more. If a single passenger hires a multi-person vehicle that can take 8 passengers, they will only be charged at Tariff 1 or 2. If there are more people using the vehicle then this will work out cheaper per head than hiring more than one taxi and it is hoped this will encourage investment of the larger vehicles.

- 2.5 With the proposed uplifts, the flag fall (initial charge) would rise to the following costs:

	Current	Proposed
Tariff 1 (up to 4 passengers)	£3.90	£4.50
Tariff 2 (up to 4 passengers)	£4.50	£5.10
Tariff 3 (5 – 8 passengers)	N/A	£5.50
Tariff 4 (5 – 8 passengers)	N/A	£6.10

Distance rates will change to:

	Pence per applicable distance
Tariff 1	£0.20 (no change)
Tariff 2	£0.25 (no change)
Tariff 3	£0.25
Tariff 4	£0.30

2.6 For members ease the table shown in Appendix 5 shows the current cost per mile to the travelling public and the proposed costs should an average 4.6% uplift be applied to Tariff 1 and an average 3.8% to Tariff 2. The figures do not take into account waiting time or any extras that maybe charged. Tariff 3 has an average increase of 29.7% compared to the current Tariff 1 and Tariff 4 has an average increase of 24.4% compared to the Tariff 2, however as advised above, these also incorporate the extra charges that used to be applied per passenger.

2.7 Extra Charges

The Taxi Trade Associations have requested an increase to the maximum soiling charge from £75 to £100 and an increase to the Christmas charges from £1 to £3.

The additional charges for passengers have also been removed from the extra charges as these have now been incorporated into the four separate tariffs.

The booking charge has increased from 50p to a maximum of £1. Additional wording has been included for the booking charge to make this clear that this is at the discretion of the hackney carriage driver/operator at the point of booking, and the hirer must be informed of this charge when making the booking.

3. National and Regional Context

3.1 National Context

The Private Hire and Taxi Monthly trade magazine publish a league table of all Local Authority Hackney Carriage Tariff 1 Fare Tables Hackney Taxi Fare Tables which are updated on a daily basis. Out of the 341 local authorities that regulate taxi fares, as of 22 May 2026, Torbay is currently ranked 67 for 2 miles.

At the proposed £8.70 for 2 miles, Torbay would be ranked 38th with seven other local authorities at the same rate, including East Devon.

3.2 Regional Context

When comparing the proposed uplift to other Devon local authorities it can be seen that Torbay would be the third highest, however other Devon Authorities are reviewing their fees so this is likely to change.

Local Authority	Proposed Tariff 1 (2 miles)
Exeter City Council	£9.50
Torridge	£8.79
Torbay	£8.70
East Devon District Council	£8.70
Plymouth City Council	£8.10
North Devon District Council	£8.10

South Hams/West Devon District Council	£7.80
Teignbridge District Council	£7.26
Mid Devon District Council	£6.80
Devon Average	£8.19

4. Conclusion

- 4.1 A balance needs to be struck between the legitimate right of the trade to a viable and sustainable livelihood and the needs of the travelling public to have a safe and affordable service. The cost-of-living crisis has resulted in escalating vehicle purchase, maintenance and fuel costs. These costs are no longer absorbed through the existing Tariff. If the fares are not increased on a regular basis in line with inflation, then many potential drivers will be discouraged from entering or staying in the trade, leading to a shortage of supply and a decline in the quality of the service.
- 4.2 The proposed Tariff increase is a reasonable overall rise with an average overall rise of 4.6% for Tariff 1 and 3.8% for Tariff 2. The two additional tariffs for vehicles taking 5-8 passengers show a higher increase, however these costs have incorporated the current extra charges and will make the fare meter clearer for passengers.
- 4.3 It is considered that the proposed uplift will assist those taxi drivers licensed through the Council to face the rise in fuel costs and other cost of living rises and support Torbay's taxi trade to make a viable living, therefore reducing the number of drivers leaving the trade for better remunerated work and encouraging consideration of investment in newer environmentally friendly vehicles.

5. Financial Opportunities and Implications

- 5.1 There are no financial risks to the Council by increasing the taxi tariff.

6. Legal Implications

- 6.1 The Council must ensure they follow the prescribed public consultation has outlined in this report to comply with section 65 of the Local Government (Miscellaneous Provisions) Act 1976.

7. Engagement and Consultation

- 7.1 As outlined above, the Council is required to undertake a public consultation prior to making any amendment to the tariff. If no objections to the variation of the tariff are received, or if all objections are withdrawn, the revised Tariff will come into operation on the date of the expiration of the consultation period. However, if any objections are made and not withdrawn, the matter will return to Cabinet to consider the objections and set a further date, not later than two months after the first specified date, on which the Tariff shall come into force with or without further modifications.

8. Procurement Implications

- 8.1 There are no procurement implications.

9. Protecting our naturally inspiring Bay and tackling Climate Change

- 9.1 There are no negative carbon footprint or other environmental implications resulting from amending/uplifting the Taxi Tariff. The proposed uplift should encourage members of the trade to invest in cleaner more efficient vehicles.

10. Associated Risks

- 10.1 There are no significant risks.

11. Equality Impact Assessment

Protected characteristics under the Equality Act and groups with increased vulnerability	Data and insight	Equality considerations (including any adverse impacts)	Mitigation activities	Responsible department and timeframe for implementing mitigation activities
Age	18 per cent of Torbay residents are under 18 years old. 55 per cent of Torbay residents are aged between 18 to 64 years old. 27 per cent of Torbay residents are aged 65 and older.	Younger people may be disproportionately negatively impacted as they may rely more on taxis for educational purposes. Older people may also be disproportionately negatively impacted due to their increased reliance on taxis and the door-to-door service they provide. Public transport, including taxis play a crucial role in helping people to stay connected and maintain independence when they are unable to drive, and are therefore of particular significance to older residents aged over 65 and to younger people who may not have access to a car. Aging is linked with reduction in personal car use and are therefore more reliant on taxis especially as it is a door-to-door service. The availability of public transport is also very important to all adults and parents who do not have a car for work and social activities.	There are grants available to support vulnerable groups to access transport. Low-income families, children with a special need or medical condition or if a child's school is more than 2 miles away may also be eligible for school transport.	N/A
Carers	At the time of the 2021 census there were 14,900 unpaid carers in Torbay.	Carers are more likely to experience deprivation and therefore any rise in costs will have an impact on this group. They	.	N/A

	5,185 of these provided 50 hours or more of care.	may also require a hackney carriage to travel with the person they are caring for or travel to support them.		
Disability	In the 2021 Census, 23.8% of Torbay residents answered that their day-to-day activities were limited a little or a lot by a physical or mental health condition or illness.	People with disabilities are more likely to be negatively impacted due to their reliance on taxis and the door-to-door service they provide. They are also more likely to experience financial difficulty/poverty. This includes SEND (Special Educational Needs and Disabilities) students, although, as with other groups, the impact varies depending on how transport is funded. Any increases are likely to have an impact on the Local Authorities finances who fund the school transport provision. The Council have a register of all wheel chair accessible vehicles at Helping disabled passengers - Torbay Council All licensed vehicles must also carry assistance dogs.	There may be grants available to support vulnerable groups to access transport. Any discriminatory complaints received are fully investigated.	Licensing Officers and Police Officers
Gender reassignment	In the 2021 Census, 0.4% of Torbay's community answered that their gender identity was not the same as their sex registered at birth. This proportion is similar to the Southwest and is lower than England.	. The Department for Transport (DfT) FS13 report highlights how discrimination is part of daily life for trans people and generates 'behaviours of avoidance', particularly to using public transport. This group tend to use taxis and private hire vehicles instead of other means of public transport and therefore may be more adversely impacted by any increase in fares.	Any discriminatory complaints received are fully investigated	Licensing Officers and Police Officers

Marriage and civil partnership	Of those Torbay residents aged 16 and over at the time of 2021 Census, 44.2% of people were married or in a registered civil partnership.	These proposals are not intended to impact on this client group	Any discriminatory complaints received are fully investigated	Licensing Officers and Police Officers
Pregnancy and maternity	Over the period 2010 to 2021, the rate of live births (as a proportion of females aged 15 to 44) has been slightly but significantly higher in Torbay (average of 63.7 per 1,000) than England (60.2) and the Southwest (58.4). There has been a notable fall in the numbers of live births since the middle of the last decade across all geographical areas.	These proposals are not intended to impact on this client group. The DFT FS13 report identified that public transport plays a vital role in supporting social inclusion for many parents with young children and therefore they may be more adversely impacted by any increase in fares.	Any discriminatory complaints received are fully investigated.	Licensing Officers and Police Officers
Race	In the 2021 Census, 96.1% of Torbay residents described their ethnicity as white. This is a higher proportion than the Southwest and England. Black, Asian and minority ethnic individuals are more likely to live in areas of Torbay classified as being amongst the 20% most deprived areas in England.	The DFT FS13 report identifies that 'people from BAME background are less likely to have access to a private vehicle, be more reliant on public transport to access employment. Furthermore 'for many people from a BAME background having regular, affordable, clean and efficient transport is essential'. There is also evidence that individuals from a minority background are more likely to experience poverty and therefore any increase in fares will have an impact.	Any discriminatory complaints received are fully investigated	Licensing Officers and Police Officers

Religion and belief	64.8% of Torbay residents who stated that they have a religion in the 2021 census.	The DFT FS13 report identifies that certain groups of people, face an increasing risk of being victims of religious hate crime. For people who have a marked religious identity through clothing there is a heightened risk for harassment or discrimination. It is reported that this is particularly true for women who are already more vulnerable regardless of the way they dress. Therefore, any increase in fares will have an impact.	Any discriminatory complaints received are fully investigated	Licensing Officers and Police Officers
Sex	51.3% of Torbay's population are female and 48.7% are male	Females are more likely to experience poverty and are more likely to use taxis and other public transport. The DFT FS13 report identifies that 'as women are more likely than men to live on low incomes, work part time and undertake paid work in the home and in the community, such as being carers for dependent relatives, poor quality unreliable and expensive transport has a far bigger impact on the lives of women'. The report also identified that women may not have access to a car during the day as they 'either cannot afford one or the family car is being used by a partner'. The F13 report also identifies women make greater use of taxi's than men, increasing with age, where women over 70 make double the number of trips than men. Any increase in fares may encourage more females to risk walking home at night or seek lower cost, less regulated alternatives such as unlicensed vehicles. A UK Survey	Any discriminatory complaints received are fully investigated	Licensing Officers and Police Officers

		by Plan International found that 62% of young women take taxis home at least monthly for safety reasons. Around 6 in 10 young women use taxis due to anxiety about other routes at night. 9 in 10 women report feeling unsafe walking alone after dark www.gov.uk/government/speeches/women-and-girls-walking-safety)		
Sexual orientation	In the 2021 Census, 3.4% of those in Torbay aged over 16 identified their sexuality as either Lesbian, Gay, Bisexual or, used another term to describe their sexual orientation.	The DFT FS13 report identifies that safety and security (and perceptions of them) are key for lesbian, gay and bisexual people and may influence how they choose or prefer to travel. It also says that a 2018 LGBT survey pointed to public transport as the most common place where respondents avoided being open about their sexual orientation and that it may even be avoided altogether. Therefore, they may use taxis more than other forms of transport so may be adversely impacted by any rise.	Any discriminatory complaints received are fully investigated	Licensing Officers and Police Officers
Veterans	In 2021, 3.8% of residents in England reported that they had previously served in the UK armed forces. In Torbay, 5.9 per cent of the population have previously serviced in the UK armed forces.	Some veterans could be negatively affected by taxi fare increases. This will depend on a number of factors, many of which may fall into the other categories such as age, disability, socio-economic impacts.	Any discriminatory complaints received are fully investigated	Licensing Officers and Police Officers

Additional considerations				
Socio-economic impacts (Including impacts on child poverty and deprivation)	The taxi tariff has to be raised to balance the legitimate right of the trade to a viable livelihood and the needs of the travelling public. The cost-of-living crisis has hit the taxi trade hard most notably through the escalating vehicle purchase, maintenance and fuel costs. These costs are no longer absorbed through the existing tariff.	As advised above, the people that rely on public transport will be impacted by any rise in costs and they may not be able to take alternative transport.	N/A	N/A
Public Health impacts (Including impacts on the general health of the population of Torbay)	N/A	There is a possibility of social isolation if there are barriers in obtaining affordable transport.	N/A	N/A
Human Rights impacts	There are no human rights impact with regards to the taxi tariff.	There may be impacts on the right to family life and the right to education if the fees impact on people's ability to travel.	N/A	N/A
Child Friendly	Torbay Council is a Child Friendly Council, and all staff and Councillors are Corporate Parents and have a responsibility towards cared for and care experienced children and young people.	Care experienced children are more likely to have poor education and health outcomes and are more likely to experience poverty and may be more adversely affected by any rise in fares. It may also have an impact on the ability to travel to school if they rely on taxis.	N/A	N/A
FS13: Future of Transport - Equalities and access to opportunity - rapid evidence review (publishing.service.gov.uk)				

12. Cumulative Council Impact

None

13. Cumulative Community Impacts

None

Appendix 1: Proposed tariff

Tariff	Fares for up to four passengers
1	For all hirings commencing between 7am and 9pm from Monday to Saturday inclusive except those mentioned in Tariff 2. Initial Charge £4.50 for the first 470 yards (430 metres) or part thereof and 20p for each subsequent 145 yards (133 metres) or part thereof. Waiting time 20p for every 30 seconds or part thereof.
2	For all hirings commencing between 9pm and 7am from Monday to Saturday inclusive, all day Sundays and Bank Holidays. Also, between 7pm on Christmas Eve until 7am on Boxing Day and between 7pm on New Years Eve until 7am on the 2nd of January. Initial Charge £5.10 for the first 470 yards (430 metres) or part thereof and 25p for each subsequent 145 yards (133 metres) or part thereof. Waiting time 25p for every 30 seconds or part thereof.
Tariff	Fares for 5, 6, 7, or 8 passengers
3	For all hirings commencing between 7am and 9pm from Monday to Saturday inclusive except those mentioned in Tariff 4. Initial Charge £5.50 for the first 470 yards (430 metres) or part thereof and 25p for each subsequent 145 yards (133 metres) or part thereof. Waiting time 25p for every 30 seconds or part thereof.

4	For all hirings commencing between 9pm and 7am from Monday to Saturday inclusive, all day Sundays and Bank Holidays. Also, between 7pm on Christmas Eve until 7am on Boxing Day and between 7pm on New Years Eve until 7am on the 2nd of January. Initial Charge £6.10 for the first 470 yards (430 metres) or part thereof and 30p for each subsequent 145 yards (133 metres) or part thereof. Waiting time 30p for every 30 seconds or part thereof.
	Additional charges – No extra charges will be made for luggage, prams, pushchairs or wheeled trolleys
Page 54 of 54	Booking Charge At the discretion of the operator for each booking made in advance which requires the driver to drive to the hirer's designated pick-up point. The Hirer must have been informed of the charge at the time of making the booking. Maximum Charge: £1
	£3 for each hiring carried out between 7pm on Christmas Eve until 7am on Boxing Day and between 7pm on New Years Eve until 7am on 2nd January.
	£1.50 for each uncaged animal, except guide, hearing and other assistance dogs
	£100 for the soiling of the interior or exterior of a cab
	For charging purposes only Two children between the ages of 3 years and 6 years shall be regarded as one person. A child under the age of 3 years shall not be reckoned. The meter will be reset at the start of each journey, charges for distance and time registering automatically and additional charges being set by the driver.

Appendix 2: Current tariff

Tariff 1 – For all hiring's commencing between 7am and 9pm from Monday to Saturday inclusive, except those mentioned in Tariff 2.

£3.90 for any distance up to 470 yards (430 meters)

20p for each subsequent 145 yards (133 meters) or part thereof

20p for each completed period of 30 seconds (waiting time)

Tariff 2 – For all hiring's commencing between 9pm and 7am on Monday to Saturday inclusive, all day Sundays and Bank Holidays. Also, between 7pm on Christmas Eve until 7am on Boxing Day and between 7pm on New Years Eve until 7am on the 2nd of January.

£4.50 for any distance up to 470 yards (430 meters)

25p for each subsequent 145 yards (133 metres) or part thereof

25p for each completed period of 30 seconds (waiting time)

Additional charges –

Each additional passenger in excess of one (accompanied children under the age of 3 are not charged, two children between 3 and 6 to be charged as one)	20p
For each uncaged animal except guide, hearing or other assistance dogs	£1.50
Booking Charge For each hiring where the driver is required to drive to the hirer's designated pick-up point.	50p
For the soiling of the interior or exterior of a cab.	£75
For each hiring carried out between 7pm on Christmas Eve until 7am on Boxing Day and between 7pm on New Years Eve until 7am on the 2 nd of January.	£1

Appendix 3

Tariff Setting Methodology

In order to regularly review the maximum taxi fares for Torbay, there should be a fair and robust method for doing so. Licensing Officers have subsequently reviewed the methodologies used by a number of different Local Authorities and the following method has been used to determine whether any fare increase is necessary and balanced.

The proposed methodology has been created to provide a transparent process for calculating taxi fares and seeks to measure the true costs of providing taxis and the 'cost per mile' figure necessary to safeguard the sustainability for this valuable public service. The information provided in this document is supported by factual evidence. If statistical data is not available, the calculations are based on reasoned argument.

The proposed calculation uses the relevant factors shown in the following table:

1	The annual average earnings figure for a full-time employee for Torbay (£)
2	Average of the AA pence per mile total for standing charges and running costs (pence)
3	Vehicle Insurance costs (£)
4	The cost of a council taxi driver badge and vehicle licence, and an allowance for: training, medicals, and DBS checks.
5	Cost of installing and maintaining card terminal per year (does not include the 3% charge as this is not able to be passed onto the customer)
6	The average annual earnable mileage of a licensed Torbay taxi

The relevant factors used in the calculation are explained in more detail below.

1. Annual Average Earnings

The economic cost of running a hackney carriage includes the drivers' earnings and this factor must be taken into account when setting the fare tariff. There is no reliable information on the earnings of taxi drivers, and it is therefore proposed that the government's annual average earnings figure should be used.

The annual average earnings figure for a full-time employee for Torbay is sourced from The Office of National Statistics (ONS) found at:

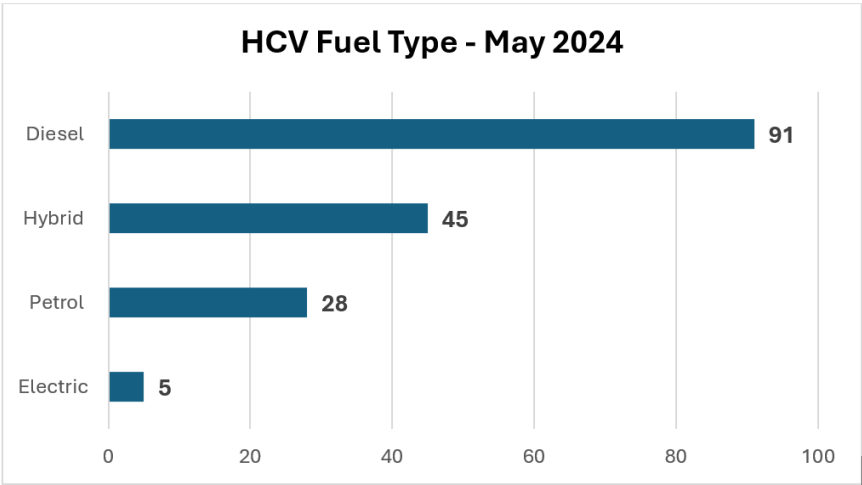
Earnings and Hours Worked, Work and Residence-Based Travel to Work Area: ASHE Tables 11 and 12 - Office for National Statistics (ons.gov.uk)

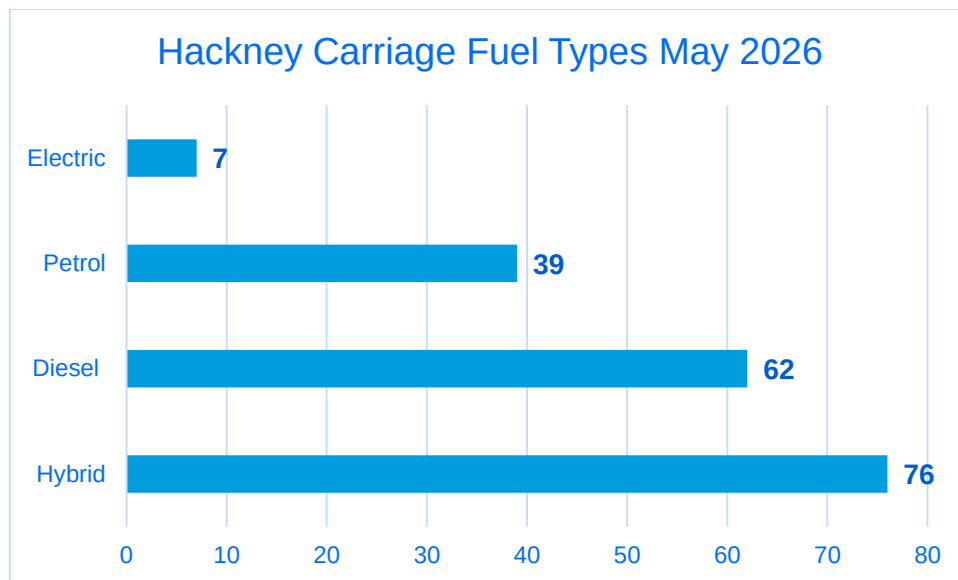
Please note the data has not been updated since 2022 and there is no date specified for when any new data will be published. The filters applied to obtain the information are shown in the table below:

ONS Filters	
Statistics	Mean Average
Geography	Geography-England, South West, Torquay and Paignton
Hours and earnings	Hours and Earnings-Annual Pay Gross
Sex	All
Time	2022 (or most recent available year)
Working Time	All (Full & Part Time)
Workplace or Residence	Both
Average	= £24,381

1. Vehicle Costs

We have based the calculations on a diesel vehicle. There has been an increase in Hybrid vehicles since May 2024, however there is a still a large number of diesel vehicles and the cost of diesel fuel is currently higher.





The average costs of running a diesel vehicle are calculated without taking individual or differing business practices into account.

Until 2014, the Automobile Association (AA) provided the most accurate data available for the costs of running a diesel vehicle based upon the fuel type and average mileage of a vehicle. This is a detailed index and consists of costs for road tax, insurance, depreciation, subscriptions, fuel, oil, tyres, servicing, repairs and replacements for a variety of vehicle types and distances travelled. Please refer to Appendix 7.

While the AA currently do not publish recent information of this nature, they do provide a detailed explanation as to how a vehicle proprietor can estimate their vehicle standing which captures the above information and is still considered appropriate to use. Therefore the 2014 data provided by the AA is used to provide an average figure but is adjusted to allow for the percentage inflation rise along with the cost of fuel since the data was obtained.

The formula below takes the average of the total of standing charges and running costs in pence per mile for diesel cars costing between £26,000 and £32,000 on purchase.

AA Vehicle Motoring Costs April 2024		
The AA Motoring Costs 2014 document has been used and adjusted where figures not available.		
Cumulative price increase of 42% June 2014 to May 2026		
Standing Charges Per Year (£)	£26,000 to £36,000	Inflation Adjusted for 2024
VED (Road Tax) Average of £180 & £400	£180.00	X
Insurance	£601.00	X
Cost of Capital	£541.00	X
Depreciation	£3373.00	X
Breakdown Cover	£50.00	X
Standing Charges Only: £	£4,745.00	X
Standing Charges as Pence Per Mile (At 30000 per year)	17.28	X
Running Costs at Pence Per Mile		
Diesel Fuel*	£12.88	X
Tyres	£2.02	X
Service & Labour Costs	£2.24	X
Replacement Parts	£2.99	X
Parking and Tolls	£2.00	X
Running Costs Only	22.14	X
* Nb Fuel for AA based on 137.0 pence per litre. For each penny more or less add or take away 13p (0.09 x 1.42 inflation)		
Average UK pump prices (https://www.gov.uk/government/statistics/weekly-road-fuel-prices) Diesel Fuel on 18 May 2026 was 186.56 pence per litre		
Total of Standing and Running Costs as Pence Per Mile	39.42	X

2. Vehicle Insurance Costs

All insurance policies are different, and some proprietors/drivers pay more than others depending on individual circumstances. In addition, taxi drivers incur additional insurance premiums for the 'hire and reward' element of driving. The calculation is based on the average premium from a random sample of drivers.

4. Costs of maintaining driver and vehicle licence with Torbay Council

This calculation takes in to account the cost of maintaining driver and vehicle licences with additional allowances for DBS checks, medicals and attending appropriate training.

5. Earnable mileage figure

Dead mileage is the term used to describe the amount of mileage spent driving without a passenger in the vehicle i.e. non-earnable mileage. HMRC generally consider dead mileage is set at 40% for rural areas whereas 50% is considered suitable for urban areas.

As Torbay is mainly urban, then the earnable mileage and dead mileage should be set at an even 50/50 % split.

We have estimated the average annual mileage figure at around 30000 miles therefore the earnable mileage is set at 15000 miles.

6. Calculation Results

Once the data has been obtained it is input into the below equation to provide a figure showing the cost per mile to run a taxi in Torbay.

1	The annual average earnings figure for a full-time employee for Torbay (£)	x
2	Average of the AA pence per mile total for standing charges and running costs (pence)	x
3	Vehicle Insurance costs (£)	x
4	The cost of a council taxi driver badge and vehicle licence, and an allowance for: training, medicals, and DBS checks.	x
5	Cost of installing and maintaining card terminal per year (does not include the 3% charge as this is not able to be passed onto the customer)	x
6	The average annual earnable mileage of a licensed Torbay taxi	x

Running Costs per Mile = £ X

Appendix 4

Worked example of Fare setting calculations – Torbay Council

Average Earnings

The most up to date data shows that the average salary in Torbay for 2021 is **£24,480 per year**.

The annual average earnings figure for a full-time employee for Torbay is sourced from The Office of National Statistics (ONS) found at:

Earnings and Hours Worked, Work and Residence-Based Travel to Work Area: ASHE Tables 11 and 12 - Office for National Statistics (ons.gov.uk)

The filters applied to obtain the information are shown in the table below:

ONS Filters	
Statistics	Mean Average
Geography	Geography-England, South West, Torquay and Paignton
Hours and earnings	Hours and Earnings-Annual Pay Gross
Sex	All
Time	2022 (or most recent available year)
Working Time	All (Full & Part Time)
Workplace or Residence	Both
Average	= £24,381

1. Cost of Running a Diesel Vehicle

The calculations are based on the cost of a new representative vehicle in the fleet licensed by Torbay Council around £30k, namely:

- Skoda Octavia, 1498 or 1598- Skoda Octavia Hatchback 1.5 TSI SE 5dr specification and running costs (fleetnews.co.uk) – £25, 700
- Toyota Hybrid 1798- Toyota Corolla Hatchback 1.8 Hybrid Design 5dr CVT specification and running costs (fleetnews.co.uk) - £31,900

Current prices have been inputted where this is possible, and prices have been adjusted (using the Inflation calculator | Bank of England) by the cumulative price increase of 42% along with the cost of fuel since the data was obtained.

AA Vehicle Motoring Costs May 2026

The AA Motoring Costs 2014 document has been used and adjusted where figures not available.

Cumulative price increase of 42% from 2014 to April 2026 using [Inflation calculator](#) | [Bank of England](#)

Standing Charges Per Year (£)	£26,000 to £36, 000	Inflation Adjusted for 2024
VED (Road Tax) Average of £180 & £400	£180.00	£200 (actual cost)
Insurance	£601.00	£2312 (actual average cost based on 12 drivers' insurance costs)
Cost of Capital	£541.00	£768.22
Depreciation	£3373.00	£4,755.93
Breakdown Cover	£50.00	£200
Standing Charges Only: £	£4,745.00	£8236.15
Standing Charges as Pence Per Mile (At 30000 per year)	17.28	27.45
Running Costs at Pence Per Mile		
Diesel Fuel*	£12.88	£19.20
Tyres	£2.02	£2.87
Service & Labour Costs	£2.24	£3.18
Replacement Parts	£2.99	£4.25
Parking and Tolls	£2.00	£2.84
Running Costs Only	22.14	32.34
* Nb Fuel for AA based on 137.0 pence per litre. For each penny more or less add or take away 13p (0.09 x 1.42 inflation)		
Average UK pump prices (https://www.gov.uk/government/statistics/weekly-road-fuel-prices) Diesel Fuel on 18 May 2026 was 186.56 pence per litre		
Total of Standing and Running Costs as Pence Per Mile	39.42	59.79

The figure obtained is vehicle running costs of **60 pence per mile**.

2. Vehicle Insurance Costs

This figure is set at **£2312 per annum** based on an average of a sample of 12 hackney carriage drivers' insurance premiums.

3. Costs of maintaining driver and vehicle licence with Torbay Council

For this current year (From 1 May 2026) this is set at **£340**.

(Based on Vehicle renewal of £207 and 1/3rd of the 3-year drivers' renewal of £294, plus medical (£50 plus), training (£35) etc. so rounded to £340)

4. Calculations

1	The annual average earnings figure for a full-time employee for Torbay (£)	£24,381
2	Average of the AA pence per mile total for standing charges and running costs (pence)	£0.60
3	Vehicle Insurance costs (£)	£2312
4	The cost of a council taxi driver badge and vehicle licence, and an allowance for: training, medicals, and DBS checks.	£340
5	Cost of installing and maintaining card terminal per year (does not include the 3% charge as this is not able to be passed onto the customer)	£520
6	The average annual earnable mileage of a licensed Torbay taxi	15,000
Cost per mile Calculation (1+2+3+4+5) ÷ 6 =		£1.84

Running Cost Per Mile = **£1.84**, which is an increase of **£0.05 (2.8%)** since the last review in 2024.

Appendix 5

Tariff 1 – Day rate, up to 4 passengers				
Current/baseline	Tariff 1 – Current	Proposed	Tariff 1 – Proposed	
Journey (Miles)	Current / Baseline	Proposed	Difference	% Increase
1	£5.70	£6.30	£0.60	10.5%
2	£8.10	£8.70	£0.60	7.4%
3	£10.70	£11.30	£0.60	5.6%
4	£13.10	£13.70	£0.60	4.6%
5	£15.50	£16.10	£0.60	3.9%
6	£17.90	£18.50	£0.60	3.4%
7	£20.30	£20.90	£0.60	3.0%
8	£22.70	£23.30	£0.60	2.6%
9	£25.10	£25.70	£0.60	2.4%
10	£27.50	£28.10	£0.60	2.2%
Average	£16.66	£17.26	£0.60	4.6%

Tariff 2 – Night/Sunday/Bank Holiday rate, up to 4 passengers				
Current/baseline	Tariff 2 – Current	Proposed	Tariff 2 – Proposed	
Journey (Miles)	Current / Baseline	Proposed	Difference	% Increase
1	£6.75	£7.35	£0.60	8.9%
2	£9.75	£10.35	£0.60	6.2%
3	£13.00	£13.60	£0.60	4.6%
4	£16.00	£16.60	£0.60	3.8%
5	£19.00	£19.60	£0.60	3.2%
6	£22.00	£22.60	£0.60	2.7%
7	£25.00	£25.60	£0.60	2.4%
8	£28.00	£28.60	£0.60	2.1%
9	£31.00	£31.60	£0.60	1.9%
10	£34.00	£34.60	£0.60	1.8%
Average	£20.45	£21.05	£0.60	3.8%

Tariff 3 – Day rate, 5–8 passengers				
Current/baseline	Tariff 3 – Current baseline	Proposed	Tariff 3 – Proposed	
Journey (Miles)	Current / Baseline	Proposed	Difference	% Increase
1	£5.70	£7.75	£2.05	36.0%
2	£8.10	£10.75	£2.65	32.7%
3	£10.70	£14.00	£3.30	30.8%
4	£13.10	£17.00	£3.90	29.8%
5	£15.50	£20.00	£4.50	29.0%
6	£17.90	£23.00	£5.10	28.5%
7	£20.30	£26.00	£5.70	28.1%
8	£22.70	£29.00	£6.30	27.8%
9	£25.10	£32.00	£6.90	27.5%
10	£27.50	£35.00	£7.50	27.3%
Average	£16.66	£21.45	£4.79	29.7%

Tariff 4 – Night/Sunday/Bank Holiday rate, 5–8 passengers				
Current/baseline	Tariff 4 – Current baseline	Proposed	Tariff 4 – Proposed	
Journey (Miles)	Current / Baseline	Proposed	Difference	% Increase
1	£6.75	£8.80	£2.05	30.4%
2	£9.75	£12.40	£2.65	27.2%
3	£13.00	£16.30	£3.30	25.4%
4	£16.00	£19.90	£3.90	24.4%
5	£19.00	£23.50	£4.50	23.7%
6	£22.00	£27.10	£5.10	23.2%
7	£25.00	£30.70	£5.70	22.8%
8	£28.00	£34.30	£6.30	22.5%
9	£31.00	£37.90	£6.90	22.3%
10	£34.00	£41.50	£7.50	22.1%
Average	£20.45	£25.24	£4.79	24.4%

Appendix 6



Motoring Costs 2014

Petrol Cars

See note:	Standing charges per year, £	Purchase price of the car when new:				
		Up to £13 000	£13 000 to £18 000	£18 000 to £25 000	£25 000 to £32 000	Over £32 000
A	VED (Road Tax)	110	145	180	283	609
B	Insurance	360	409	481	571	762
C	Cost of capital	203	251	355	494	877
D	Depreciation	1190	2156	2611	3672	6974
E	Breakdown cover	50	50	50	50	50
	Standing charges only: £	1913	3011	3678	5070	9271
	Standing charges as pence per mile					
	at 5,000 miles per year	37.78	59.36	72.51	99.93	182.64
	at 10,000	19.13	30.11	36.78	50.70	92.71
	at 15,000	13.07	20.65	25.21	34.78	63.67
	at 20,000	10.16	16.13	19.69	27.18	49.84
	at 25,000	8.22	13.08	15.96	22.04	40.43
	at 30,000	6.89	10.97	13.39	18.49	33.93
	Running costs, pence per mile					
F	Petrol *	10.84	13.12	14.55	16.22	18.04
G	Tyres	1.37	1.57	1.94	2.32	3.35
H	Service labour costs	2.10	2.07	2.09	2.04	2.34
I	Replacement parts	2.24	2.39	2.25	2.73	3.34
J	Parking and tolls	2.00	2.00	2.00	2.00	2.00
	Running costs only: p.	18.56	21.14	22.83	25.31	29.06
	* NB: Petrol at 129.0 pence per litre					
	For each penny more or less, add or take away:	0.08	0.10	0.11	0.13	0.14
	Total of standing and running costs as pence per mile					
	at 5,000 miles per year	56.34	80.51	95.34	125.24	211.70
	at 10,000	37.68	51.26	59.60	76.01	121.78
	at 15,000	31.63	41.79	48.04	60.09	92.73
	at 20,000	28.72	37.28	42.52	52.49	78.91
	at 25,000	26.78	34.22	38.79	47.35	69.50
	at 30,000	25.45	32.12	36.22	43.80	62.99

Please see the associated notes for more detail. These figures are typical but do not represent all types of vehicle and conditions of use. Once compiled, some of the variables may change at any time.

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Version 2 (July 2014)



Motoring Costs 2014

Diesel Cars

See note: Standing charges per year, £

		Purchase price of the car when new:				
	£	Up to £16 000	£16 000 to £22 000	£22 000 to £26 000	£26 000 to £36 000	Over £36 000
A	VED (Road Tax)	30	110	180	180	361
B	Insurance	424	499	511	601	771
C	Cost of capital	245	325	429	541	823
D	Depreciation	1705	2426	2618	3373	5197
E	Breakdown cover	50	50	50	50	50
Standing charges only: £		2454	3411	3788	4745	7203

Standing charges as pence per mile

at 5,000 miles per year	48.40	67.24	74.71	93.55	141.98
at 10,000	24.54	34.11	37.88	47.45	72.03
at 15,000	16.81	23.38	25.95	32.53	49.40
at 20,000	13.12	18.27	20.25	25.41	38.61
at 25,000	10.63	14.81	16.41	20.60	31.31
at 30,000	8.92	12.42	13.76	17.28	26.26

Running costs, pence per mile

F	Diesel Fuel *	9.28	10.20	12.65	12.88	16.79
G	Tyres	1.15	1.49	2.06	2.02	2.87
H	Service labour costs	2.10	2.14	2.29	2.24	2.76
I	Replacement parts	2.73	2.43	2.53	2.99	3.44
J	Parking and tolls	2.00	2.00	2.00	2.00	2.00
Running costs only: p.		17.26	18.25	21.54	22.14	27.85

* NB Fuel at: 137.0 pence per litre

For each penny more or less,

add or take away:	0.07	0.07	0.09	0.09	0.12

Total of standing and running costs as pence per mile

at 5,000 miles per year	65.66	85.49	96.25	115.69	169.83
at 10,000	41.80	52.36	59.41	69.59	99.88
at 15,000	34.08	41.64	47.49	54.67	77.26
at 20,000	30.39	36.52	41.79	47.55	66.47
at 25,000	27.90	33.06	37.94	42.74	59.16
at 30,000	26.18	30.67	35.30	39.42	54.11

Please see the associated notes for more detail. These figures are typical but do not represent all types of vehicle and conditions of use. Once compiled, some of the variables may change at any time.

Fuel Price Report

January 2015



The pace of fall in petrol and diesel pump prices accelerated in December as supermarkets took advantage of plunging wholesale prices to compete for customers with cars. However, with oil needing to fall to \$40 a barrel at least but staying in the \$45-\$50 range, £1 a litre predictions look misplaced.

Unleaded prices are down 7.4p from 116.3 ppl to 108.9 ppl. **Diesel** prices have fallen 6.1p from 122.2 ppl to 116.1 ppl. The price difference between unleaded and diesel has increased to 7.2 ppl.

East Anglia has recorded the highest price for **unleaded** at 109.4 ppl. The **North, Northern Ireland, South West and Yorkshire and Humberside** have recorded the lowest price for **unleaded** at 108.8 ppl. **Scotland** has recorded the highest **diesel** price at 116.9 ppl. **Northern Ireland** has the cheapest **diesel** at 115.7 ppl.

Supermarket prices for **unleaded** have fallen to 107.1 ppl. The gap between supermarket prices and the UK average for **unleaded** has shrunk to 1.8 ppl.

Garages and Supermarkets	Unleaded 95 Octane (pence)		Diesel (pence)		Super Unleaded (pence)		LPG (pence)
	litres	(gallons)	litres	(gallons)	litres	(gallons)	litres
Northern Ireland	108.8	494.6	115.7	525.98	114.4	520.1	0.0
Scotland	109.2	496.4	116.9	531.44	119.5	543.3	62.4
Wales	109.0	495.5	116.4	529.16	121.2	551.0	61.5
North	108.8	494.6	116.2	528.26	119.7	544.2	62.4
North West	109.1	496.0	116.1	527.80	123.3	560.5	0.0
Yorkshire & Humberside	108.8	494.6	115.9	526.89	125.7	571.4	63.2
West Midlands	109.0	495.5	116.2	528.26	122.8	558.3	67.9
East Midlands	109.0	495.5	115.9	526.89	121.1	550.5	61.6
East Anglia	109.4	497.3	116.5	529.62	116.8	531.0	63.9
South East	108.9	495.1	116.2	528.26	118.4	538.3	61.4
South West	108.8	494.6	116.1	527.80	118.2	537.3	60.3
London	108.9	495.1	116.0	527.35	118.3	537.8	63.9
UK AVERAGE	108.9	495.1	116.1	527.80	119.7	544.2	62.2
Per cent taken as Tax		69.9		66.58		65.1	

Supermarkets	Unleaded 95 Octane		Diesel		Super unleaded		LPG
	Litres	(gallons)	litres	(gallons)	litres	(gallons)	litres
SUPERMARKET AVERAGE	107.1	486.9	113.9	517.8	112.1	509.6	60.2
Per cent taken as Tax		70.8		67.55		68.4	

The AA Public Affairs Fuel Price Report uses data sourced from Experian Catalist (www.catalist.com)
They are an average of mid-month prices from the respective regions.

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Terra Firma – English Riviera Geopark Review – Report of the Overview and Scrutiny Board

Report to Cabinet on 15 July 2026

Background

1. The Overview and Scrutiny Board met on 6 May 2026 to consider a report and presentation on the Terra Firma project and the future governance and delivery of the English Riviera UNESCO Global Geopark from the Cabinet Member for Tourism, Events & Culture and Corporate Services - Councillor Jackie Thomas and the Chair of the English Riviera Geopark Organisation – Nick Powe. Key points included:
 - The Terra Firma project was intended to strengthen governance, clarify delivery arrangements and improve long-term sustainability of the Geopark.
 - Proposals included transitioning the English Riviera Geopark Organisation into a Community Interest Company (CIC), with clearer roles, governance and accountability.
 - Geological and cultural heritage were closely linked to tourism and place promotion, and Torbay's Geopark status remained under-promoted.
 - The Geopark revalidation process was outlined, including submission deadlines, evaluation visits and decision-making timescales.
2. Members raised the following questions:
 - How frequently would the re-established Geopark Board meet and what themes would it focus on?
 - How was specialist geological expertise being provided in the absence of a dedicated geologist?
 - Would the lack of a geologist impact future UNESCO revalidation?
 - How would the Community Interest Company improve awareness and interpretation of the Geopark for residents and visitors?
 - What future funding streams were anticipated once current grant funding ends?
 - What was the timetable and process for the next UNESCO Geopark revalidation?
 - How would schools and young people be supported to engage with Geopark learning?
 - How will partner organisations' roles be clarified and strengthened?

3. The following responses were received:
- The Geopark CIC Board was expected to meet four times a year, with themed meetings covering tourism, community engagement and education etc.
 - Geological expertise was currently provided through partnership working with academic institutions e.g. Plymouth University, and this has been sufficient to date.
 - It was confirmed that existing expertise and co-ordination arrangements were considered adequate for revalidation purposes.
 - The CIC model was intended to provide clearer governance, improved communication, stronger branding and a more visitor-focused approach.
 - Long-term funding will require a mixed model, including grants, partnerships and alternative funding sources; it was acknowledged that while continuing Council funding was vital, remaining the sole funder was not sustainable.
 - Revalidation documentation must be submitted in January 2027, followed by evaluator visits in mid-2027 and a final UNESCO decision in 2028.
 - Educational engagement will focus on toolkits, digital resources, school partnerships and improved website content.
 - Core partnerships will be refreshed with clearer terms of reference and expectations around delivery and leadership roles.
4. The background papers can be found at [Agenda for Overview and Scrutiny Board on Wednesday, 6 May 2026, 5.30 pm](#)
5. The Board formed the following recommendation to the Cabinet. On being put to the vote, the motion was declared carried unanimously.
- 6. Recommendation**
- 6.1 That the Cabinet be recommended to review the signs for UNESCO English Riviera Geopark to ensure that they are up to date and fit for purpose and report back to the Board on any progress to implement this.

For information only:

That the Board welcomed the direction of travel for review of the Terra Firma – English Riviera Geopark Review and the proposed creation of Community Interest Company (CIC) and requested that the Board receives an update on the progress of the Review in the Autumn.

TORBAY COUNCIL

Cabinet Response to the recommendations of the Overview and Scrutiny Board – Terra Firma English Riviera Geopark Review

Recommendation 1:

That the Cabinet be recommended to review the signs for UNESCO English Riviera Geopark to ensure that they are up to date and fit for purpose and report back to the Board on any progress to implement this.

Response/Update:

Cabinet welcomes the recommendation and recognises the importance of ensuring that signage for the UNESCO English Riviera Geopark is up to date, visible and fit for purpose. Information has been provided by SWISCo in relation to the existing boundary signs, and this will help inform the review of current provision.

The Corporate Plan and supporting strategies such as the Destination Management Plan identify the importance of the designation to Torbay's identity, visitor economy and wider Pride in Place ambitions. Cabinet has therefore asked officers to review options to improve signage in support of raising awareness of the designation, while taking account of practical deliverability, costs and the potential impact of Local Government Reorganisation.

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