

Appendix 1 Subject: Assessment of Representations made on the Regulation 18 Torbay Local Plan Update Growth Options (January-February 2022)

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What is the proposal and it benefits?

1 Summary

- 1.1 This briefing note summarises feedback received on the Local Plan Housing Growth Options Consultation, which ran from 10th January 2022 to 28th February 2022. It seeks to brief Members on the main issues to arise from the consultation responses. This report does not make recommendations. The attached is intended to flag up issues and start a conversation with Members on the Local Plan Update. More detailed recommendations will be provided to Members on the 12th July 2022, and set out in a separate report.
- 1.2 The growth options consultation sought views on five possible housing growth scenarios, (which sought to test how far Torbay is able to achieve the “Standard Method” growth rate of around 600 dwellings per year). The consultation received slightly over 1,500 responses. These were made up of:
 - 844 responses to a short survey
 - 509 responses to a more detailed survey
 - 63 comments on Facebook.
 - 94 more detailed letters (55 individuals, 15 housebuilders/landowners, 8 Forums/partner bodies, 6 neighbour LPAs, 10 national bodies.
- 1.3 There is likely to be some overlap between the three sources of comments i.e., some people filled in the questionnaire as well as making a separate written representation. It is possible that some people filled in both questionnaires. As with all matters, the weight of the planning arguments put forward is important as well as the number of comments.
- 1.4 The overwhelming majority of survey responses from the public supported Option 1 “no more greenfield” development (estimated to provide between 190-250 dwellings a year). There was support for a “hybrid” approach that sought to maximise the potential of urban regeneration brownfield sites. When people’s first three options were taken into account, Option 3 emerged as the “least unfavourite” approach.
- 1.5 Responses were received from all Torbay’s neighbouring authorities. They indicated that Torbay should do all it can to meet its housing needs. ¹ Most of the agents commenting on the consultation argued that housing numbers are a strategic matter and that the Plan period should be rolled forward to at least 2040 to ensure 15 year post adoption Plan period. Some neighbouring authorities and public responses also highlighted the need to give the Climate Emergency greater emphasis.

¹ Conversely some private representations argued for an even lower option than 1.

- 1.6 Several neighbouring authorities recommended that Torbay challenge the standard method of calculating housing need. This is understandable as it could hypothetically reduce Torbay's "ask" to them. The Standard Method is getting increasingly dated, being based on 2014 data. However, Torbay's affordable housing need is very high – The final HELAA identifies a need for 721 affordable house a year, of which 387 are for rent and 334 are for affordable housing for sale. This is likely to make present a difficulty should the council seek to challenge the Standard Method level of housing need. Note that the main report for Cabinet on 12th July 2022 discusses this matter in more detail and in the light of subsequent evidence.
- 1.7 Confirmation was given of site availability, and some additional sites were promoted for development. Most of the additional sites are in the Churston/Galmpton and Brixham area. It is noted that sites being most actively promoted are within the South Devon AONB.

2. Next Steps

- 2.1 No decision is needed on these issues at this meeting. A fuller Cabinet session is planned for 12th July 2022, and further information will be provided for this meeting. Advice on next steps will help officers compile the next stages of the Plan. Key issues that have arisen in the responses and will need to be considered and addressed are:
- Do Members wish to consider wider issues such as the Climate Emergency?
 - Should the Plan period be rolled forward to 2040 (or later?)
 - Which option should form part of the preferred option? Despite the high level of opposition to new greenfield land, there are strong indications that Option 1 would not meet Duty to Cooperate and Test of Soundness requirements.
 - If Members decide to promote a hybrid approach, further thought to how this would operate in practice (and a better title for it).
 - Which (if any) sites should be included in the preferred option?
 - Should the Local Plan challenge the Standard Method as a way of calculating housing need?
 - Section 106/CIL Priorities. Note that the Police and NHS are both seeking contributions from new development.
 - Should the next stage be a Regulation 19 "Preferred Option" or would Members prefer to "soft test" proposals through a further round of Regulation 18 consultation.
- 2.2 Nothing put forward in the representations suggests that Torbay *can* meet the standard method growth figure of 560-600 dwellings per year. (Exhortations that we "should seek to meet" our need is not the same as saying we "can"!). It is recommended that further evidence of environmental (landscape and ecological) capacity, and market capacity (viability and effective demand) is prepared in parallel to the next stage of Plan preparation. Work is currently taking to commission Landscape Character Assessment work, and other environmental evidence. This will be needed for the Local Plan Examination and our Duty to Cooperate discussion with neighbours.
- 2.3 The council has completed a Housing and Economic Needs Assessment (HENA) which assesses the need for affordable housing. However, need is not the same as effective demand or development viability. If Members do consider it worth challenging the standard method, a more detailed assessment of market capacity and viability would be necessary.
- ## 3 Background.
- 3.1 Cabinet resolved to carry out a limited review of the Local Plan to update its policies for housing supply, and also to test whether the government's "standard method" should be used to calculate the level of housing need. An initial issues consultation (Regulation 18) on the proposed limited update was carried out between Monday 22nd March 2021 to Tuesday 4th May 2021. The purpose of the consultation was to assess whether the option of updating housing numbers and retaining the existing terminal date of 2030. As such it was a technical consultation, and unsurprising that it

received a relatively low level of responses (26 in total). The council also prepared a Housing and Economic Land Availability Assessment during 2021, which was used as the basis for the Local Plan Growth Options consultation.

- 3.2 The consultation was at “Regulation 18” for the Local Planning Regulations, which is an “issues and options stage” where no key decisions have been made. The broad options that we are seeking views on are:

Option 1: No further greenfield allocation beyond already allocated or approved sites. This is estimated to provide between 190-250 dwellings a year.

Option 2: Limited further greenfield development. As per option 1 plus a limited number of greenfield sites deemed as having relatively minor constraints. This is estimated to provide between 250-300 dwellings a year.

Option 3: One or two further urban extensions. As per option 2 plus one or two further urban extensions. Several possible “sub-options” for the location of the potential urban extension exist. However, further expansion at the west of Paignton appears to be the most likely area. This option is estimated to provide between 320-380 dwellings a year but will be dependent on further assessment and determination of the extent of an urban extension.

Option 4: All sites that have not been ruled out in principle. This includes sites which have significant environmental constraints. This option could provide between 470-500 dwellings a year.

Option 5: Meeting full needs (as calculated by Government). To achieve a growth rate of around 560-600 dwellings per year, all sites including many rejected by the HELAA as unsuitable for development would need to be allocated.

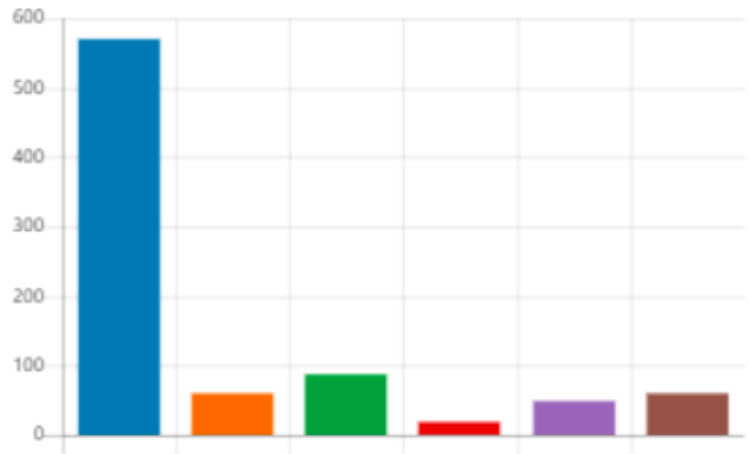
Views were also sought on a “hybrid” approach for the Local Plan to contain a split target, with a lower minimum requirement, but a more ambitious target specifically for urban regeneration sites

- 3.3 In order to get a wider range of responses the most recent consultation was conducted via a traditional “mail merge” of organisations and people on the Local Plan consultation database, as well as via questionnaires and social media. A short and long online survey was carried out. A number of (virtual) presentations were given to Neighbourhood Forums and other interested groups.

Quick Questionnaire

- 3.4 The quick questionnaire simply sought views on which growth option Torbay should follow. It received 844 responses, 789 (93%) of whom were Torbay residents. 496 (59%) responses were from people aged 55 or older. Option 1: no more greenfield development beyond already allocated/approved sites was the most favoured option, being the first option for nearly 68% of respondees, followed by Option 3 (although with only 10.4% of people’s first choices). Option 4 was the least favoured option with only 2.2% of the first choices.

- Option 1: No more greenfield ... 570
- Option 2: The first option and ... 59
- Option 3: Includes option two ... 88
- Option 4: All sites that could b... 19
- Option 5: Meet the full needs ... 49
- Option 6: A mixture of the 5 o... 59

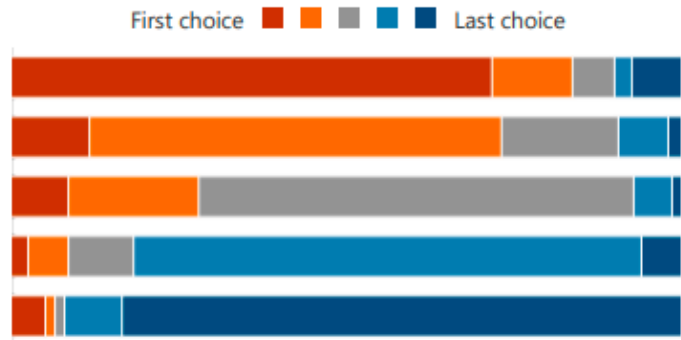


Detailed Survey

3.5 A more detailed survey asked wider questions about the growth options. It received 509 responses, 450 of whom were Torquay residents, 24 from elsewhere in Devon. There were 17 responses from organisations. 349 responses were from people aged 55 or older and 447 were homeowners. Over three quarters of responses favoured Option 1 and put option 5 as the last option. However, when totalling people’s first three choices and discounting the two least favoured options), option 3 became the “least unfavourite” option followed by 2 and then 1. Somewhat surprisingly, Option 5 was more popular (that is less unpopular) than Option 4.

Rank Options

- 1 Option 1: No further greenfiel...
- 2 Option 2: Limited further gre...
- 3 Option 3: One or two further ...
- 4 Option 4: All sites that have n...
- 5 Option 5: Meeting full needs ...



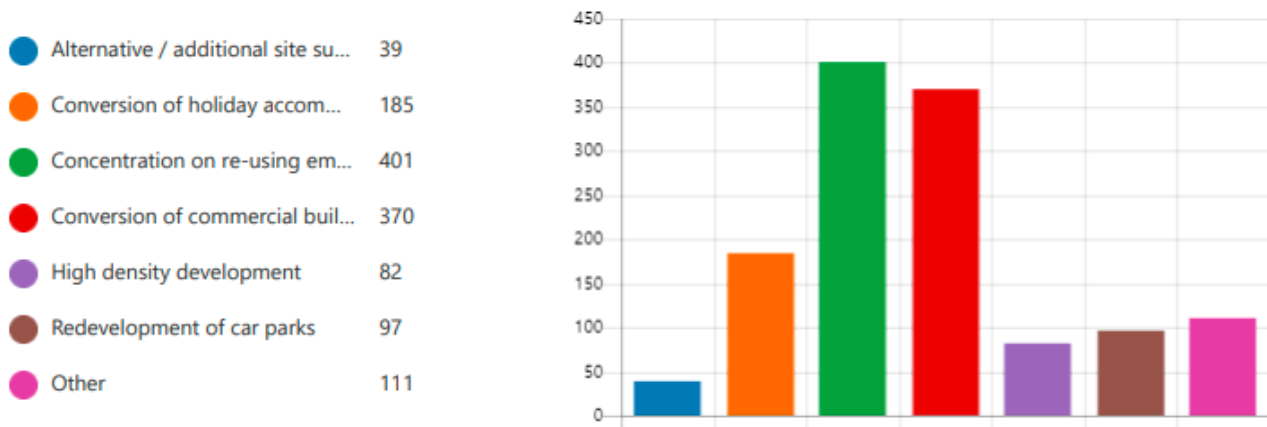
3.6 Environmental harm was the main reason stated for people’s preference for no more greenfield development. 349 responses (69%) would support a hybrid option with a lower baseline figure but a higher potential figure that could only be met through brownfield sites, with about 75% of those who expressed a preference stating that “option 1” should be the baseline. There was fairly broad support for increasing housing densities.

12. Would you support a general increase in the density (number of homes) built on sites?

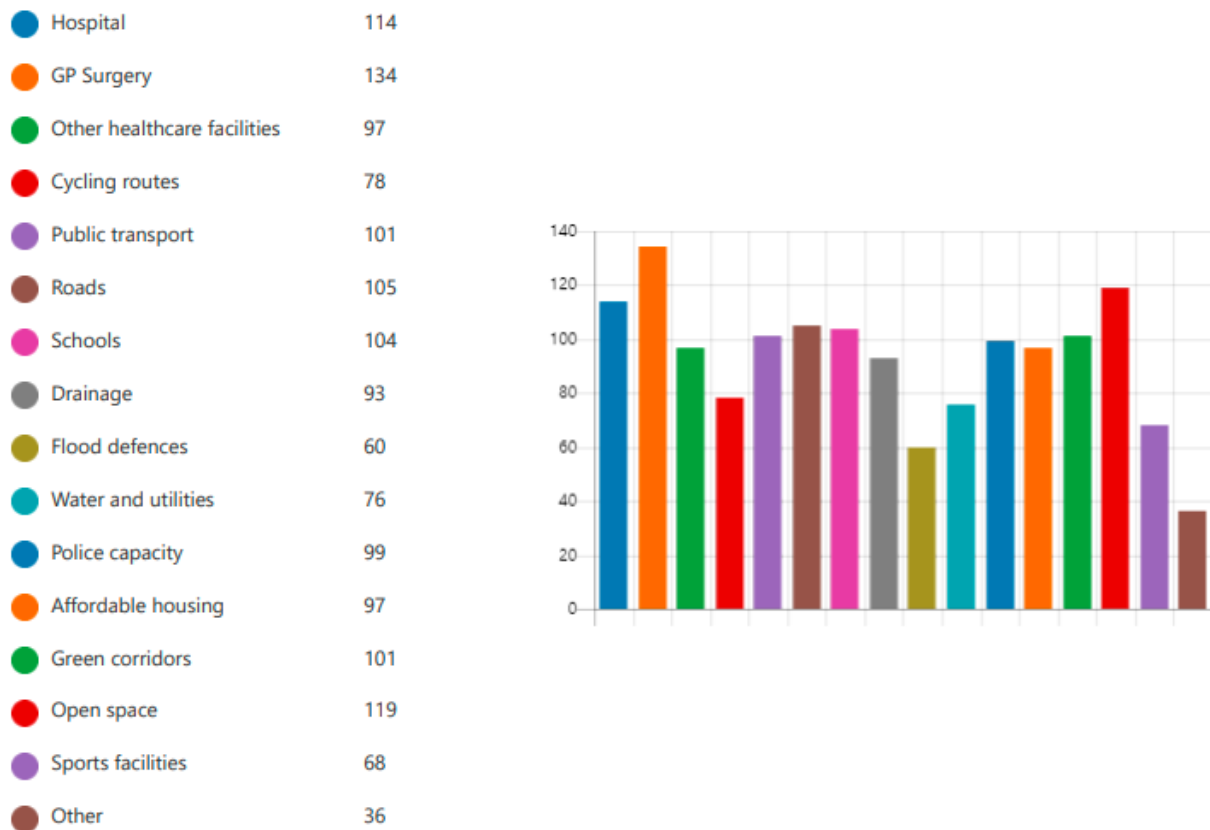
- Yes, in all cases 45
- Yes, on brownfield sites only 169
- Yes, in town centres only 102
- No 165



3.7 When asked about alternative ways of boosting supply, there was support for a range of brownfield options, including reuse of holiday accommodation and employment/ commercial buildings.



3.8 The questionnaire asked about infrastructure shortfalls. Although healthcare shortfalls were the main infrastructure reason why people expressed opposition to new development, a range of other matters were also raised. Clearly many respondees considered there to be multiple infrastructure shortfalls.



Facebook

3.9 The council also carried out social media posts on the Local Plan Update, which received 63 votes as follows: Option 1:43 votes, Option 2: no votes, Option 3: 7 votes, Option 4: 1 vote, Option 5: 3 votes, Hybrid option: 9 votes.

Detailed Letters/Email

- 3.10 In addition to the surveys, the Council received approximately 90 emails/written letters from national bodies, neighbour local authorities, house builders and land agents, and the general public. These comments are summarised in more detail in the table at the end of this briefing note. However, in summary the main issues raised are:
- 3.11 **National Consultees** (Natural England, RSPB, English Heritage, National Trust, Environment Agency, National Trust): Sites promoted in the growth options will need detailed assessment. Concerns were raised about Options 4 and 5 without further evidence. Objections to Options 4 and 5 from environmental charities such as RSPB and National Trust: “would be catastrophic”. Both Devon and Cornwall Police and the NHS Foundation Trust argued that new development should contribute towards meeting the needs arising from housing growth to policing and healthcare.
- 3.12 **Internal/Partner Organisations** (TDA, Torbay Housing Delivery Board): Need to identify more employment sites. Need to allocate more housing land to provide affordable housing.
- 3.13 **Neighbourhood Forums** (Torquay, Paignton, BCG Villages, Brixham Town Council): Support for a hybrid approach that would focus on regeneration, opposition to greenfield options, infrastructure and environmental constraints were noted. New housing should be targeted at local affordable needs rather than market housing for incomers. The council cannot control housing completions- there are sufficient sites allocated in the Local /Neighbourhood Plans and sites with planning permission, that are not being built out.
- 3.14 **Neighbouring LPAs** (DCC, Teignbridge, East Devon, Mid Devon, Plymouth and West Devon Joint Local Plan). A range of issues. Consideration of these is particularly important due to the statutory Duty to Cooperate, and there is currently no agreement for neighbours to take Torbay’s unmet need.
- Torbay should be doing all that it can to meet its housing needs.
 - More evidence is needed before neighbours are convinced that Torbay cannot achieve its housing needs.
 - The Standard Method may be challengeable given that it is based on 2014 data and the draft 2020 based demographic figures are lower than the 2014 baseline. The census results should be available in the summer.
 - Other areas have constraints.
 - Offer to help with a joint evidence base and to identify urban capacity sites.
- 3.15 **Housebuilders and Agents** (Deeley Freed, Pegasus, Taylor Wimpey, Bloor, Vistry, MVA).
- Need to boost housing numbers to meet needs. Housing Delivery issues were noted: Torbay has been over reliant on brownfield land that has not delivered.
 - Housing numbers are a strategic issue, and the Plan period should be extended to provide 15 years Plan period.
 - Some acknowledgement that Option 5 may not be achievable and that it is important that housing is built “in the right place”
 - Some additional sites promoted: Mainly in Churston and Monksbridge, Brixham. Confirmation that land west of Paignton (Yalberton) is being actively promoted.
 -
- 3.16 **Individuals** Most of these appear to have also completed the questionnaire. Site specific objections to: Land at Great Hill Torquay, Broadsands BCG Area, Summercourt Way, Brixham. Note that residents of Yalberton lost their internet connection during the recent storms and were given an extension to 21st March to make site specific comments in relation to Yalberton (i.e., the land indicated in Option 3).

4 What decision is required?

No decision is required at this time.

5 Is the decision a 'key decision' and therefore require the submission of a forward plan?

No decision is required at this time. This paper is to brief Members of the Local Plan consultation responses.

6 What are the financial opportunities/implications?

The full report on the consultation will need to advise on this. However, representations noted significant infrastructure funding gaps.

7 How does this link to the delivery of the Community and Corporate Plan?

Delivery, quality and affordability of housing; reducing levels of deprivation in the bay. It also affects tackling the climate emergency.

8 Will other Council services or partners be affected?

The TDA have made representations to ensure that sufficient employment land is identified in the Local Plan update as well as housing land.

9 Who needs to be engaged/consulted as this proposal is progressed, including any formal consultation for implementation?

The Local Plan is subject to a wide range of consultation, as well as Sustainability Appraisal and Habitats Regulations Appropriate Assessment.

10 Outside the Cabinet members, what other councillors need to be briefed on this issue and at what stage? *This may need to be determined by the Leader and Deputy Leader of the Council.*

12 What external communications are needed?

None- The purpose of this briefing is to inform Cabinet of consultation responses.

13 What is the proposed timetable for progression? How can Overview and Scrutiny contribute?

Torbay Local Plan Growth Options Consultation (January-February 2022)

SUMMARY OF WRITTEN REPRESENTATIONS

Torbay Council

March 2022.

Summary of Coding

R18(2)- Regulation 18, Second consultation

Nat National Organisations

NLA Neighbouring Local Authority

TP Torbay Partner Bodies, Neighbourhood Forums, Community Partnerships, Neighbouring Parishes and Amenity Societies

RP Registered Providers/Social Enterprise

DI Development Industry/ Housebuilders/Planning Agents

P Private individuals

Representations on Regulation 18 Growth Options Consultation 10th January -28th February 2022

ID	File No.	Person /Organisation Consultee	Summary of Representation.	LPA Response
National organisations				
	Nat1	Natural England (ref 379348)	<p>More detailed environmental evidence needs to be produced to support options and to assist in meeting SEA requirements.</p> <p>Landscape Character Assessment – 2010 LCA needs updating</p> <p>Water Quality – Sewer capacity assessment (2014) needs updating and further mitigation measures may be needed to protect the integrity of the Marine SAC.</p> <p>Recreational Pressure on Berry Head to Sharkham Point needs to be evaluated to ensure that it is being implemented effectively.</p> <p>Greater Horseshoe Bat SAC: Assessment of the effect of development and mitigation measures to prevent habitat loss and fragmentation on greater horseshoe bat SAC.</p> <p>The HELAA should allocate land of the lowest environmental and amenity value. Including designated landscapes and best/most versatile agricultural land.</p> <p>NE agree the general approach in the HELAA as a “coarse grain” assessment but more landscape, HRA and other evidence is needed before sites are allocated. This should include a consideration of in-combination effects and recommend effective mitigation.</p> <p>Natural England have not supported a particular option but note that the preferred option should:</p> <ul style="list-style-type: none"> i) Avoid harm to the internationally, nationally and locally designated sites of importance for biodiversity; 	Noted- additional environmental assessment will be needed of sites/options before being taken further.

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			<ul style="list-style-type: none"> ii) Avoid harm to priority habitats, ecological networks, and priority and/or legally protected species populations; iii) Seek opportunities to contribute to the restoration and re-creation of habitats, the recovery of priority species populations and biodiversity enhancement; iv) Seek opportunities to enhance and create Green Infrastructure, and to enhance public rights of way and accessible natural green space; v) Avoid harm to the character of nationally protected landscapes - Areas of Outstanding Natural Beauty - and locally valued landscapes; vi) Avoid the loss of Best and Most Versatile Agricultural Land; and vii) Avoid harm to nationally and locally designated sites of importance for geological conservation - geological SSSIs and Local Geological Sites (also known as RIGS - Regionally Important Geological Sites) <p>Note that some of the options will harm biodiversity, nature recovery, green infrastructure, protected landscapes, and best and most versatile agricultural land. Detailed advice and links are provided about assessing these.</p> <p>The Local Plan should address the impacts of climate change on the natural environment and the role of the natural environment in reducing the effects of climate change. This includes coastal change management.</p> <p>Further consultation on the Local Plan’s Habitats Regulations Assessment will be needed. Since 2015 there has been a growing awareness of impacts on the Lyme Bay and Torbay marine SAC.</p>	

Representations on Regulation 18 Growth Options Consultation 10th January -28th February 2022

ID	File No.	Person /Organisation /Consultee	Summary of Representation.	LPA Response
	Nat2	RSPB (Helene Jessop)	<p>Impact of growth options on cirl bunting territories. Scale of potential new housing in Torbay in Options 4 and 5 will seriously limit the area of land available to provide necessary compensation for loss of cirl bunting territories, and new development on existing farmland means more limits on the potential for the population in Torbay to be maintained, let alone recover.</p> <ul style="list-style-type: none"> • Option 1 – category of Principle of Development Established will impact on 3 territories (all within 250m but territory centres in adjacent South Hams District Council area), Existing Future Growth Area will impact on another 1 territory. • Option 2 – no additional cirl bunting territories impacted. • Option 3 – 1 additional cirl bunting territory impacted. • Option 4 – 20 additional cirl bunting territories impacted. • Option 5 – category of Additional Sites in this Option will impact on 6 additional territories, Broad Locations Considered would impact on another 37 territories. • If all proposed areas in each Option was progressed to development, there is a potential to impact on c60 territories (note that some potential development areas in different Options will impact on the same territories). <p>If ALL categories proceed (Option 5), the impact on cirls in Torbay will be catastrophic, as will the difficulty of providing sufficient compensatory habitat within Torbay. Whilst compensatory habitat provision could be potentially secured (via agreement with TC and SHDC via S106) outside Torbay, RSPB does not wish to see loss of current population from Torbay as the effect of development on that scale will strip Torbay of much of its habitats and ability to support species. Habitat used by cirl buntings is also obviously used by other wildlife, including greater horseshoe and other bat species in some areas.</p>	Noted – greenfield options will affect habitats. Detailed assessment of any site allocations (including achieving net gain, will be needed).

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ID	File No.	Person /Organisation /Consultee	Summary of Representation.	LPA Response
	Nat3	Environment Agency (Shaun Pritchard)	<p>Realistically, Options 3, 4 and 5 will require careful consideration and investment in order to understand and potentially overcome environmental constraints. These options will almost certainly have serious questions marks in respect of sustainability and viability which the council will need to balance against the pressure for future housing.</p> <p>Recommend engagement with DEFRA family on environmentally sensitive issues. The following topics will require attention; Flood risk management, surface water management, biodiversity (habitat and species), Biodiversity Net Gain, Water Framework Directive and bathing waters and Catchment Management opportunities.</p> <p>The suitability of the strategic option should, in part be decided based on the potential to secure the appropriate environmental compensation, mitigation and net gain as set out in policy.</p>	Noted- detailed assessment of flooding/water quality effects of options is required.
	Nat4	Historic England Rebecca Harfield	<p>The Consultation Document and accompanying SA identify the potential for harm to Torbay's historic environment resulting from all the growth options. In the SA, we note that negative impacts are identified under the Heritage SA Objective for options 1-3 with significant negative impacts found for options 4 and 5. SA Appendix A explains the reasons for this, which we generally agree with.</p> <p>From a heritage perspective, we welcome the Council's intent to find an appropriate balance between:</p> <ul style="list-style-type: none"> • maximising housing growth in Torbay's historic town centres and managing the resulting pressure that taller and/or denser new development may place on the significance and settings of some heritage assets, and townscape and seascape; with 	Noted – HIA of allocations will be required. Noted that Historic England is concerned about the effect of greenfield development as well as urban regeneration options on heritage assets within the built up area. Objects to options 4 and 5.

Representations on Regulation 18 Growth Options Consultation 10th January -28th February 2022

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			<p>• encouraging some housing growth elsewhere, such as on the edges of the town centres or in more rural locations, and managing the impacts on the significance and settings of other heritage assets, the settings of historic towns and villages, and Torbay’s historic landscape.</p> <p>The SA/Local Plan should focus on mitigating impacts on the historic environment. It would be helpful for the Council to explore these in a Heritage Topic Paper.</p> <p>A Heritage Impact Assessment will be needed for sites that are proposed to be allocated. Should also take into account archaeological impact.</p> <p>Historic England objects to the inclusion of site allocations without this. Conflict with paragraphs 31,189,190 and 192 of the NPPF. For further information and advice, see GPA1: The Historic Environment in Local Plans (2015) and HEAN 3: Site Allocations (2015), GPA3: The Setting of Heritage Assets (2017).</p> <p>Support option 1: subject to mitigation of impacts on the historic environment.</p> <p>Option 2- Does not object in principle but notes that 21P018 Preston Down Road has potential for significant archaeology.</p> <p>21T050 Broadley Drive. Potential impact on Cockington CA and nearby listed buildings.</p> <p>21T064 Sladnor Park Maidencombe. Potential impacts on Maidencombe and Watcombe CAs and Brunel Manor Registered Park and Garden. Recommend a masterplan for the site.</p> <p>Option 3 sites. Historic England does not object to the principle of this approach if it would help relieve pressure on heritage assets in the town centres, but this depends on the suitability of the identified sites for residential development individually and cumulatively from an historic environment perspective.</p>	

Representations on Regulation 18 Growth Options Consultation 10th January -28th February 2022

ID	File No.	Person /Organisation /Consultee	Summary of Representation.	LPA Response
			<p>21P012, 21P059, 21P067, Lower Yalberton Holiday Park, Long Road, Paignton – potential impact on the group of grade II listed buildings c.250m to the east of the site associated with the Lower Yalberton Farm.</p> <p>21P056, 21P077, 21T078 Land South of Totnes Rd, Collaton St Mary, Paignton – impact on Grade 2* St Marys Church and other listed buildings in the area.</p> <p>Heritage Impact Assessment will be needed to justify allocation of these sites.</p> <p>Options 4 and 5: Historic England Objects due to likely impact on heritage assets. More justification would be needed before bringing forward these options.</p>	
	Nat5	Network Rail (Grace Lewis)	<p>Consideration should be given to the impact of development upon level crossings</p> <p>Recommend that any development of land which would result in a material increase or significant change of the traffic using existing rail infrastructure (particularly level crossings) and/or require rail improvements should also be added to this list of development when a TA is required.</p> <p>Where there is an adverse impact on the operation of the railway, Network Rail will require appropriate mitigation measures to be delivered as part of the planning application process.</p>	Noted
	Nat6	National Trust (Donna Crabtree)	<p>The Local Plan should consider the impact of development on National Trust assets, including: Compton Castle, Greenway, East Dart Estate, Woodhuish Farm (part of Coleton Fishacre) which are close to Torbay's boundary. (A map of NT land is included).</p> <p>The National Trust also owns land at Sharkham Point which lies within Torbay District Council.</p>	Noted (see above). Confirmation that NT land is not available.

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ID	File No.	Person /Organisation Consultee	Summary of Representation.	LPA Response
			<p>NT land at Sharkham Point is not available for development and the historic and environmental designations on the area should be protected.</p> <p>Options 4 and 5 proposals are those of particular concern from an ecological perspective, especially relating to the most sensitive areas to the south of Torbay and adjacent to National Trust sites at Greenway and Woodhuish Farm/Land at Southdown.</p> <p>The National Trust objects to the inclusion of sites which would result in significant or severe environmental harm as presented by these options (4 and 5).</p> <p>NT does not object in principle to option 3 sites, but notes that their environmental impact will need to be considered in more detail.</p> <p>The council should set out how its unmet need can be accommodated with its neighbours, in order to avoid planning by appeal.</p>	<p>The impact on land identified will need to be taken into account if land close to these four estates is pursued as a preferred option.</p> <p>Objection to Options 4 and 5 noted.</p>
	Nat7	<p>Torbay and South Devon NHS Foundation Trust</p> <p>NHS Devon Clinical Commissioning Group</p>	<p>S106 Obligations are sought from new development towards the NHS/CCG's needs.</p> <p>Registered patients with GPs are up by 4,132 since 2014: which is higher than the 2014 sub national population projections. 39% increase in population puts additional pressure on GPs and Torbay and South Devon NHS Trust.</p> <ul style="list-style-type: none"> - Most GP practices are over-subscribed. This puts pressure on hospital and other services. - There may be a need for new GP practices depending on the location of development. Ongoing discussion is needed. - Inwards migration of older people results in the need for additional services/ health care needs. - Torbay hospital is the focus for healthcare services across Torbay. 	<p>Request for S106 funding noted.</p>

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			<ul style="list-style-type: none"> - Occupants of new housing developments are not considered by the national NHS funding formula until at least a year after they have occupied their new home. During this period the new occupants will naturally make use of the services provided by TSDFT which incur an unfunded cost to the Trust. The additional infrastructure requirements and cost to provide services cannot be absorbed by the Trust and therefore is a directly related impact of the new housing which will have to be met by the developer through a CIL compliant section 106 contribution request. 	
	Nat8	Devon and Cornwall Police (David White for)	<p>Development will generate additional need for police and capital infrastructure. Torquay Police station cannot expand further. Capital also includes vehicles and ICT.</p> <p>Housing development should contribute towards police capital requirements. This is supported by paragraphs 8,20,26,32, 92 and 95 of the NPPF and is lawful under regulations 122 and 123 of the CIL Regulations</p> <p>The principle of using developer contributions towards policing was accepted by the S of S on appeal APP/X2410/A/12/2173673 at Charnwood Borough Council. Cornwall is also seeking to secure policing contributions.</p>	Request for S106 funding noted.
	Nat9	National Grid, Avison Young on behalf of.	<p>Please consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets</p> <p>Developers of sites crossed or near National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.</p> <p>High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ.</p>	Comments noted – these are general and do not mention specific assets.

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			Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines	
	Nat10	Coal Authority	Torbay Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on Torbay's Local Plans /SPDs etc.	Noted
Neighbouring Local Planning Authorities (LPAs)				
	NLA1	Devon County Council (Eleanor Ward/ Mike Deaton)	<p>There is cross border movement between Torbay and Devon in terms of education. Particular discussion is needed about increasing special education need provision.</p> <p>There are cross boundary flooding/hydrological catchment areas. Need for sustainable drainage and flood risk management. The Strategic Flood Risk Assessment and Management Strategy should be referenced in the Local Plan's strategy.</p> <p>The Local Plan Update will need to include funding mechanisms (s106 etc.) including for DCC infrastructure.</p>	Need to update S106 Obligations in relations to Education is noted. This is being addressed through the SPD update.
	NPA2	Teignbridge District Council (Alex Lessware)	Teignbridge supports Torbay's regeneration and brownfield development objectives and is sympathetic to Torbay's challenges in meeting the Government's housing target as determined via the standard method. Teignbridge is also facing a very high housing target and is facing	Neighbouring LPAs' views noted. Their starting point is that Torbay needs to do all it can to meet its

Representations on Regulation 18 Growth Options Consultation 10th January -28th February 2022

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			<p>equal challenges in finding suitable sites to accommodate development without causing environmental detriment and stress on existing local communities.</p> <p>Important that both areas begin Plan preparation with the intention of meeting their housing target. Torbay must do everything it can to accommodate its own needs- Options 3, 4 and 5 should be further explored.</p> <p>Insufficient evidence has been provided to justify consultation on Options 1 or 2. Likely that the public will vote for these options, but they would not be legitimate choices for the council without significant further evidence including landscape sensitivity and capacity evidence, biodiversity and mitigation evidence, landownership willingness evidence, topographical and access evidence</p> <p>The council should contact landowners of potential sites including those not in then HELAA.</p> <p>The Council should carry out a targeted urban capacity study to supplement the HELAA and work proactively with owners and relevant organisations to make sites viable.</p> <p>It should work with neighbourhood planning bodies to bring forward smaller sites.</p> <p>The council should consider investing in new highway or infrastructure to open areas up.</p> <p>It should consider lower levels of affordable housing on steep land or other high cost sites.</p> <p>Teignbridge objects to Options 1 and 2. They should not be taken any further. They will place undue pressure on neighbouring areas.</p>	<p>housing requirement.</p>

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	NPA3	Mid Devon District Council (Tristan Peat)	<p>MDDC recognise environmental constraints, but other authorities also have constraints.</p> <p>Torbay should rigorously test all options to meet its housing needs within the borough. The HELAA could be supplemented by urban capacity work.</p> <p>Options 3, 4, and 5, or a hybrid of these options are encouraged in the sense that each warrants further exploration, in discussion with neighbourhood planning bodies.</p> <p>Options 1 and 2 imply that Torbay's housing needs are unable to be met in full in the Borough. More evidence to support this is needed. More testing of environmental constraints is needed to test this.</p> <p>Options 1 or 2 would not best serve the interests of Torbay, nor can it be assumed that the need can be met in other local authorities.</p>	See above
	NPA4	East Devon District Council (Matt Dickins)	<p>We recognise the environmental constraints in Torbay that have helped shaped plan making in the Borough, but that these constraints are similar to those experienced in other local authority areas. However, great priority should be given to planning to meet the need for new homes and jobs where that need arises.</p> <p>Unclear whether Torbay has assessed urban capacity.</p> <p>Torbay Council should also look at other, innovative models for the delivery of new homes which might help achieve greater numbers and over shorter timeframes, such as modern methods of construction and serviced plots for custom and self-build. It should also include sites better suited to smaller house building companies.</p>	See above

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			<p>Options 3,4 and 5 or a hybrid are encouraged as warranting further consideration. Positive dialogue with neighbourhood planning bodies is encouraged.</p> <p>Options 1 and 2 do not meet Torbay's needs. A fuller suite of evidence on landscape, ecology etc. Would be needed to justify why lower growth options are justified.</p> <p>It cannot be assumed that other local authority areas may have potential to help meet part of Torbay's housing need, since these too are subject to environmental and capacity constraints.</p>	
	NPA5	Exeter City Council (George Marshall/ Katharine Smith/Bindu Arjoon).	<p>Exeter City Council supports Torbay's regeneration and brownfield development objectives and is sympathetic to Torbay's challenges in meeting the Government's housing target as determined via the standard method. Exeter is also required to accommodate significant housing numbers within a tightly defined administrative area.</p> <p>As this stage there appears to be insufficient evidence made available to justify pursuing Options 1 and 2 which would only accommodate part of the local housing requirements. Torbay Council should take all reasonable steps to enable the authority to accommodate its own housing target within its administrative area. On this basis, Exeter City Council supports further exploration of Options 3, 4 and 5, or a hybrid of these options.</p> <p>If Torbay Council suggests that it cannot meet its full housing requirement this should be clearly and robustly evidenced. Including discussions with landowners, targetted urban capacity studies, discussions with Homes England to unlock sites.</p> <p>Exeter launched the Liveable Exeter programme to identify opportunities to help Exeter meet its development needs, particularly to the north and northwest of the city- ECC would be happy to share experiences and lessons learnt.</p>	See above

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	NPA6	Plymouth, West Devon, and South Hams Joint Local Plan Team (Jo Lee, Graham Swiss).	<p>Recognise Torbay’s constraints and significant cross boundary issues. Agree to cross boundary work as part of the Duty to Cooperate.</p> <p>Timing of the update: The housing need figure based on the standard method is out of date. The 2014 household projections are out of date. It may be best to wait until the 2021 Census is available. The Standard Method may soon be changed. The Levelling Up White Paper proposes a future devolution deal for Plymouth, Devon and Torbay which suggests a forthcoming strategic planning tier to replace the Duty to Cooperate. Housing need and distribution across the county may be considered.</p> <p>Given that this review is dealing just with Housing, there may be a risk that this will be brought forward without an appropriate up-date of the whole range of other plan policies. Given the climate and ecological emergencies, up-to-date robust policies on these policy areas will be crucial to guide and shape future housing delivery.</p> <p>Support the principle of focusing on urban redevelopment opportunities. The Local Plan could promote minimum density standards to increase densities in Torbay. Higher densities could be achieved if there were a focus on smaller dwellings.</p> <p>Constraints could be reviewed to see how far these are “showstoppers”.</p> <p>Standalone employment sites should be allocated, rather than just mixed use developments.</p> <p>There are cross boundary transport issues, particularly in relation to the A385 at Collaton St Mary and its onward impact in Totnes.</p>	<p>Issues with the Standard Method are noted. The council share concerns about its age and note that more up to date population projections will be available later in 2022.</p> <p>Argument that the Local Plan should tackle the climate emergency is noted.</p>

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			<p>There are cross boundary issues in relation to landscape and the South Devon AONB and its setting. The South Devon SAC is potentially impacted on by further development particularly on the periphery of Paignton and Brixham.</p> <p>Options 1 and 2 are significantly lower than need. There are likely to be environmental impacts from Options 4 and 5, particularly on the AONB and SAC. Option 3 has the potential to maximise the urban development whilst seeking to keep landscape and ecological impacts. Sites (including those in Option 4) will need to be assessed in detail.</p> <p>Not clear how the hybrid option would work within the confines of national guidance. Unintended consequences need to be taken into account e.g., asking neighbours to accommodate unmet need.</p> <p>A more appropriate option would be to sense-check the standard method with an alternative assessment of housing need using more robust realistic and up to date population data using longer-term trend projections.</p>	
<p>Torbay Partner Bodies, Neighbourhood Forums, Community Partnerships, Neighbouring Parishes and Amenity Societies</p>				
	TP1	Torbay Strategic Housing Board	Support Option 4, which is assessed to provide about 500 dwellings a year. Due to the need for affordable housing, no site that has not been ruled out in principle should be excluded.	Need to increase housing supply is noted.

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	TP2	TDA Education Team	<p>The slowdown in housing completions due to the Pandemic has had an impact on school numbers. Growth Option 3 or higher would be supported to help the continued sustainability of existing local schools. Planned school expansion would accommodate development in Option 3 (i.e., west of Paignton).</p> <p>Options 4 and 5 would be likely to lead to a shortfall in places, particularly if in an area where there is no current surplus capacity.</p> <p>Continued working between school place planning and planning is welcomed.</p>	Impact upon growth options on education provision is noted.
	TP3	TDA Economic Development Team (Jason Buck)	<p>Support option 3- one or two further urban extensions.</p> <p>The current Local Plan implies a supply of 23,373 sq. ft further employment land by 2030. This will be insufficient to meet needs.</p> <p>Whilst the provision of 25% of sites for employment is welcome, it is unlikely to meet needs. There needs to be an updated Employment Land Review and allocation of additional sites. The lack of suitable flat sites and landowners' preference to hold out for housing is noted.</p> <p>TDA support the provision of employment west of Westfield Business Park, Paignton and near Stantor Barton, Torquay.</p> <p>Demand for employment space in Torbay continues to exceed supply. This now totals over 304,000 sq. ft as of the end of 2021, the majority of which is industrial (with office) required within the next 2-4 years. This figure has consistently been over 250,000 sq. ft for the past 4/5 years, with some fluctuation and despite some sites being delivered. We have also seen the loss of a substantial quantity of employment space which has been developed into alternative uses.</p>	<p>The TDA's objection that more land needs to be allocated for employment purposes is noted.</p> <p>This has cross boundary issues as well as being related to employment prospects in Torbay.</p>

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			<p>We anticipate continued future demand from inward investors and local growth, including from companies growing out of facilities such as EPIC as an example.</p> <p>Although 231 sq. ft of employment land is already allocated (schedule attached), most is privately owned, and sellers are not willing to release for employment.</p> <p>The provision of employment is essential for sustainable development.</p> <p>The high price of land (and alternative use as residential) creates a false picture that there is no demand for employment land.</p> <p>S106 Obligations for loss of employment should be used more robustly to enable the forward funding of other employment sites.</p> <p>Sites allocated in the Local Plan should be viability tested to ensure they will deliver employment.</p> <p>There are significant economic indicators showing Torbay lagging behind nationally and regionally. This also exacerbates health inequalities in coastal communities. (Detailed economic indicators supplied).</p> <p>There has been significant promotion of Torbay as a location for investment in photonics and microelectronics. However, there is now ten times less employment space to accommodate growth and TDA anticipates that companies will leave Torbay due to lack of employment land, leading to loss of employment in Torbay. If land cannot be allocated, then companies are likely to relocate out of Torbay.</p>	

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	TP4	Paignton Neighbourhood Forum	<p>The standard method local housing need figure takes no account of Torbay’s environmental constraints. Many of Torbay’s housing sites have not been built out, which places further pressure on greenfield sites.</p> <p>PNF Recommends Option1 combined with a hybrid approach:</p> <ul style="list-style-type: none"> • An achievable target, based on the housing numbers associated with allocated and approved sites, and also • An additional, aspirational target, based on estimated windfalls and encouragement of brownfield development. <p>PNF Objects to higher growth options 2-5 due to environmental harm.</p> <p>Strongly object to Option 3 at the west of Paignton due to additional pressure on the Totnes Road and additional loss of greenfield areas to housing.</p> <p>Housing needs to be responsive to the climate change crisis. All new developments should be required to have an EPC A rating.</p> <p>All new development should be more accessible – to at least Lifetime Homes M4(2) Category 2 provision, and preferable to M4(3) Category 3.</p>	<p>Concern about environmental capacity noted.</p> <p>Concern about wider climate emergency/fuel poverty issues noted.</p> <p>Objection to further development in the west of Paignton noted.</p>
	TP5	Torquay Neighbourhood Forum	<p>The Forum believes that the target of 600 houses delivered per year, set by the Government algorithms, is both unrealistic and unachievable.</p> <ul style="list-style-type: none"> - The LPA cannot control delivery of new homes, but only consents. Nationally since 2011 there have been 2.78 million consents but only 1.63 million completions; about 58%. Thus 600 dwellings per year should be circa 350 consents. 	<p>Concern about environmental capacity noted.</p>

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			<ul style="list-style-type: none"> - There has been no increase in employment in Torbay, which qualifies as an “exceptional circumstance to justify an alternative approach” in paragraph 60 of the NPPF. - Insufficient land space to accommodate development without overrunning the countryside. - Need for community green spaces - High densities would harm tourist economy - Sewer capacity is insufficient, and unless significantly expanded could pollute the marine environment. <p>Housebuilders have an incentive not to deliver on difficult/ expensive sites as the 5 year land supply issue means they can secure planning permission on greenfield sites.</p> <p>Strongly support the hybrid option with option 1 as the baseline. Would provide a strong focus on urban regeneration. There is scope for regeneration in Torquay town centre to provide affordable housing. Outside town centres there is also scope to see more housing space taking over from retail.</p> <p>Climate change must also be addressed – options 4 and 5 would prevent Torbay’s intent on reaching Net Zero carbon.</p> <p>There is a severe lack of affordable housing. Developers often use viability arguments to avoid providing affordable housing. Local people cannot afford new open market housing. This leads to inward migration, primarily of retired people. In turn, this places undue burden on the healthcare infrastructure and Social Services.</p> <p>The Forum would like to see TorVista Home’s strategy expanded, which would see new homes provided for local employees, to better balance the employment and housing provision.</p>	<p>The council agrees with TNF that the LPA cannot force developers to build out permissions.</p> <p>Concern about climate change is noted.</p>

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			<p>In conclusion, the Forum recommends the Hybrid scheme based on a baseline Option 1, rising through the tiers if absolutely necessary, and with dialogue. If the Local Plan date is set at 2030, this would allow a timely review of progress and adjustment as needed.</p>	
	TP6	Broadsands, Churston, Galmpton Neighbourhood Forum (“BCG Villages”)	<p>Environmental constraints limit Torbay’s ability to meet housing numbers. The scarcity of open countryside within Torbay coupled with the special character of the area; our environmental constraints and poor road infrastructure; and the loss of greenfield causing irreparable harm to wildlife, habitats, tourism, and our economy.</p> <p>Options 4 and 5 would prevent Torbay meeting net zero targets.</p> <p>The main need in Torbay is for affordable housing. This will not be addressed by open market developments, and there is not enough suitable space in Torbay to achieve the needed affordable homes through building market homes.</p> <p>There is funding for regeneration of town centres which are a good source of brownfield housing.</p> <p>Support a hybrid option that has a low baseline figure which 5 year supply is assessed against but a more aspirational brownfield figure.</p>	Concerns about environmental constraints are noted.
	TP7	Brixham Town Council	<p>Brixham’s capacity to accommodate further development is very limited:</p> <ul style="list-style-type: none"> - Poor accessibility. The A3022 is the only main road into Brixham. Limited parking in town and limited alternative forms of transport. - Sewerage, parking, and NHS provision are limited. - Need to protect the AONB and green sites. <p>Strongly object to Options 4 and 5 due to environmental impact.</p>	Concerns about capacity are noted.

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			<p>The government's Standard Method is unsustainable and should be fiercely challenged.</p> <p>Empty properties should be brought back into use.</p>	
Registered Providers/Social Enterprise Sector				
	RP1	LiveWest (Katie Wakefield)	<p>Favourite option is number 4: all sites that have not been ruled out in principle. This gets close to meeting the housing need and would provide significant opportunities for affordable housing and employment.</p> <p>Option 1 is our least preferred option as housing supply would be significantly below the identified need. Not providing enough homes will lead to house prices rising still further and increase the problems faced by local people in trying to find a home.</p> <p>There is likely to be unintended consequences of Option 1 in terms of an ageing population, lack of housing opportunities for young people and an over-focus on apartments.</p> <p>Support town centre regeneration, but note that it is time consuming and takes many years to achieve. It may reduce affordable housing opportunities. It is sometimes easier to provide needed infrastructure on greenfield sites.</p> <p>There is a concern about environmental impact- site allocations should take into account landscape, biodiversity, and conservation objectives.</p>	The need to boost housing numbers is noted.

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			Difficult to comment on a “hybrid” option without knowing more details. However, a lower “fixed” figure would not provide much needed affordable housing or support economic growth.	
	RP1	LiveWest (Janice Stewart- Training and Employment Development)	We are very concerned about the housing issue for young people in our service, our accommodation is temporary and finding affordable housing is extremely hard. There are not enough 1 bedroom properties on Devon Home Choice and trying to find accommodation in the private sector is extremely difficult, as landlords are reluctant to rent to young people.	Noted. This need could be addressed through town centre sites- although funding would be required.
Development Industry - Housebuilders/Planning Agents				
	DI1	Vistry Group (Felicity Crawford)	<p>Object to Option 1: will not meet Torbay’s need. There would be an overreliance on brownfield sites and an under supply of housing and affordable housing.</p> <p>Object to Option 2- will not meet needs. Sladnor Park (P/2018/1053) may not be achievable due to its topography.</p> <p>Support the west of Paignton as a location for further urban extension. The area is close to existing services and connections which makes it a highly sustainable option.</p> <p>Option 3 on its own will not meet Torbay’s needs.</p> <p>Vistry Group suggest that these sites are assessed on a bespoke basis and that a blanket approach should not be taken. We recognise Torbay is affected by environmental constraints. The environmental constraints of each of these sites needs to be carefully assessed to</p>	<p>Comments noted.</p> <p>Comments about deliverability noted.</p> <p>As a strategic matter, the Plan period needs to be rolled forward to 2040.</p>

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			<p>understand which sites can come forward for development. This may require another ‘sieving’ exercise to be undertaken by the Council to ensure the right sites come forward. Another important strand to this, is that developers and housebuilders should demonstrate at an early stage how sites can come forward without negative harm to the environment and show how sites will be enhanced, where they are deliverable.</p> <p>Sites should not be discounted before technical work has looked at ecological, technical and biodiversity impacts. Suggest that a more joined up approach between developers and the Council is taken, so information can be shared to help properly assess sites and ensure Torbay is delivering the homes it needs in the right places to meet its housing target.</p> <p>Plan Period: The Plan period should be rolled forward to 2040. This is needed to give 15 years post adoption plan period. Local Plans take on average 6-7 years to adopt. Sites take a long time to commence; particularly brownfield sites (e.g., Middle Street car park).</p> <p>The Council should carry out an Infrastructure Needs Assessment to understand the most important infrastructure needs. Vistry anticipate that this is likely to be highways, traffic, and open space.</p> <p>A density of 20-40 dwellings per hectare is acceptable, but urban sites may be capable of providing higher densities. Suggest looking at Bristol City Council’s Urban Living SPD.</p> <p>Noted that more work needs to be done on the SA. This can help with the “sieving exercise” of sites.</p>	

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	DI2	LRM Planning for Vistry	<p>Hollicombe Gas Works should not be relied on to provide 185 dwellings. Only a reduced number is likely to be viable.</p> <p>The Plan should have a 15 year Plan period (NPPF22)</p> <p>The standard method is the starting point for assessing housing need.</p> <p>The Consultation’s conclusion that the Council cannot meet its LHN level of growth is not sufficiently supported by evidence- more assessment of environmental capacity needs to be carried out.</p> <p>The LPA has been overly pessimistic about the capacity of greenfield sites, and too optimistic about the capacity from brownfield sites.</p>	Vistry have planning permission for Hollicombe, which the council is seeking to get built.
	DI3	Taylor Wimpey Copperfield Ltd on behalf of (Andrew Tildesley).	<p>Plan Period: Acknowledge the Council's desire to only update the Housing Land Supply policy of the Local Plan. We have significant concerns that this approach will undermine the ability of the Council to adequately plan for the future needs of the area and that any plan will be found to be unsound when independently assessed.</p> <p>A 2030 end date is contrary to Paragraph 22 of the NPPF: strategic policies should look ahead over a minimum of 15 years from adoption. Housing delivery, by its very nature, must be considered strategically. It is a key strategic function of any Local Plan to provide appropriate policies to meet the needs of its people</p> <p>Adoption of a new Plan is very unlikely before 2024 which will result in a very short plan period. Sticking to a 2030 plan period is likely to be a waste of time and public money as the Plan is likely to be rejected.</p>	Issues noted. TW indicate the need for a 15+ year Plan period.

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			<p>Land requirements: Taylor Wimpey agree that the standard method is the correct basis for calculating housing need in Torbay. Detailed comments on 5 year supply – the Council should have applied a 20% buffer due to under supply. Housing Delivery Test may fall below 75% which would automatically engage the Presumption. The requirement with a 20% buffer is about 776 dwellings a year.</p> <p>Torbay has potentially the most significant and attractive inward investment opportunity of all South West Local Authorities. As much of the Torbay area is already developed the authority need to look creatively at the potential for urban renewal, higher density waterfront and Town Centre opportunities alongside significant greenfield land releases.</p> <p>Options 1 and 2 fail to meet NPPF requirements and are an anti-development position. Would increase social inequality and provides few opportunities for affordable housing.</p> <p>Option 3: more information is needed on infrastructure requirements and landscape harm. Option 3 still puts considerable pressure on neighbours to meet their housing requirements.</p> <p>Option 4 – Urban areas should be looked at in more detail. Not all of the greenfield options are available. Ambitious and transformational place making opportunities exist for Torbay that are simply not available to other rural and urban authorities in the Country and nothing within this consultation document suggest that the Council are looking forward in this regard.</p> <p>Option 5: would need to provide 776 dwelling a year. The right approach for Torbay is to look towards capitalising on its urban renewal potential, delivering transformation change for the main urban centres through high quality high density developments and to supplement these developments with appropriate allocations, and delivering a positive and responsive planning</p>	

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			<p>service provided, on greenfield land to support family housing delivery and affordability for local people.</p> <p>Duty to Cooperate: East Devon’s concerns at Torbay’s approach are noted. There is no agreement in principle for Torbay’s need to be met by other LPAs.</p> <p>Failing to meet housing needs will increase the unaffordability of housing. Local people are likely to be most severely affected as they are out-priced by inwards migration.</p> <p>The council’s unwillingness to approve housing on allocated land at Collaton St Mary is noted.</p> <p>Option 5 is the only option that meets Torbay’s housing need. Meeting this magnitude of need will require a justified, effective, and positively prepared plan. It cannot be done by a simple housing update alone and will take beyond 15 years to achieve.</p>	
	DI4	Cavanna Homes AR land and Planning on behalf of.	<p>Land north of Collaton St Mary (former Bloor Homes site) is available and could accommodate more than 100 dwellings (which has approval under P/2019/0281 and HELAA site 21P078). Cavanna Homes consider that the access could accommodate 200 dwellings, but consideration of ecological mitigation is needed.</p> <p>Not all of the sites in the HELAA have been consulted with landowners, so it is not clear if they are available. E.g., Stantor Barton does not appear to be available. Without this, Torbay does not have a clear view of what land is available for development.</p> <p>No options meet the standard level of housing growth.</p> <p>The Council need to take a much more proactive and collaborative approach to identifying availability, suitability, and likely economic viability sites, rather than seeking to find ways to</p>	<p>Willingness to discuss further options at Collaton St Mary is noted.</p> <p>Issues about deliverability are noted.</p>

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			<p>resist the allocation of additional Greenfield sites. It is inevitable that this approach will lead to planning by appeal with the council losing control of the Local Plan process.</p>	
	DI5	<p>Abacus Projects Limited. Stride Treglown on behalf of. (Lauren Cook)</p>	<p>The Local Plan should look forward for a minimum of 15 years, NPPF paragraph 22. Housing is a fundamental part of the Local Plan and housing policies are “strategic”. An Inspector is likely to require 15 year post adoption plan period.</p> <p>It is acknowledged that Torbay faces a very challenging situation in respect of the ability to allocate a sufficient amount of land to meet its housing need. A sharp focus needs to be placed on the provision of incentives to regenerate the town centres and tackle difficult brownfield sites alongside an acknowledgement that the release of greenfield land to provide extensions to existing settlements will be required. Despite this dualled approach, the Council will need to look to their neighbours to assist in meeting the unmet need.</p> <p>Options 1 and 2 do not deliver the required number of dwellings. Sites within Options 3 and Option 4 should be more rigorously explored to assess suitability/availability. Option 5 would damage environmental constraints and should not be pursued.</p> <p>Not clear how a hybrid option would work, or how it could bring forward complex brownfield sites. Stride Treglown support the principle of increasing densities in town centres. The issue of lack of demand for apartments is being overplayed and the benefits of apartments to the housing market should continue to be acknowledged. Apartments provide much needed entry level housing as well as opportunities for downsizing which has the potential to bring more family housing onto the market.</p>	<p>Plan period comments noted.</p> <p>Whilst not a consultation on the HELAA per se, Abacus make some factual comments on the proformas for 21P060, 21P053 and 21P079 that warrant adjustment.</p>

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			<p>Detailed comments on two sites promoted:</p> <p>21B002 Inglewood: ecological works have been largely completed. Persimmon have taken ownership of the site. The description should be updated to remove reference to the derelict former farm buildings.</p> <p>Current trajectory is as follows:</p> <ul style="list-style-type: none"> • 2023 – 20 Plots • 2024 – 60 plots • 2025 – 60 plots • 2026 – 60 plots • 2027 – 60 plots • 2028 – 60 plots • 2029 – 53 plots <p>21P060 White Rock – Western parts of the site have been built out for employment uses.</p> <p>21P053 Land at Local Centre, White Rock – Agree that the site is suitable and available for around 120 dwellings. (Note that the spreadsheet says 60 dwellings, but Stride Treglown argue that 120 are achievable). Mix of units should be kept flexible. There is no mechanism in the S106 agreement to P/2011/0197 to require the site to be open space. Open space can be provided as part of a development scheme for the land. The north of the site was previously developed (factory) prior to development of the wider White Rock area in the 2000s. The site should therefore be treated as previously developed land. The Masterplan shows a building and</p>	

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			<p>parking on the northernmost part of the site. The site was supported by the HELAA panel. The HELAA does not refer to the site's position in an established development area. The site is classified as urban and not agriculture. There is no known history of contamination.</p> <p>21P079 Former Farmhouse. Whilst the former farmhouse building has been cleared of buildings, it contained buildings until circa 2017. The land is not needed for road widening. It is likely to be too small to provide employment use. The bulk of the land should be categorized as urban and not agricultural.</p>	
	DI6	Peloton Ltd. (Andrew Rowe)	<p>Fields at Copythorne Road are promoted for development- although in the AONB, they are less sensitive in landscape terms than other sites. Detailed site assessment and feasibility work is under way.</p> <p>A larger area of land around Copythorne Road has been promoted for development than the 21B025 Copythorne Road.</p> <p>The growth options are not backed by agreement from landowners- so not clear whether sites are available. So, Torbay does not have a clear understanding of land available in the area, contrary to NPPF paragraph 68.</p> <p>The hybrid option would fail to meet needs and result in a chronic shortage of housing, including affordable houses.</p> <p>The council needs to be more proactive and collaborative to bring forward suitable and viable sites in order to seek to meet its housing need.</p>	<p>Noted that land at Copythorne Road is being promoted and that there would be a willing landowner for a larger area around the NW boundary of Brixham. These will require assessment.</p> <p>They are within the AONB and the NPPF 177 tests are relevant.</p>

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	DI7	Kingsley Projects, Bryan Turner	Land to the west of Collaton St Mary (adjacent Saturday Car Boot sale field) is promoted for development. It is sited on a bus route and could be tied into the local footpath network. It comprises about 4.1ha of grassland.	Noted. The site is larger than the assessed site 21P043 and includes part of rejected broad location 21P084
	DI8	Baker Estates Ltd. And Belstone Fox Collier Planning on behalf of.	<p>Previous Plans have focused on too limited number of sites and brownfield development. The HDT shortfall is due to insufficient sites being allocated, and not due to market forces.</p> <p>Support options 4 or 5 to seek to boost housing availability. Land at Monksbridge, New Road, Brixham is promoted for development. The site is within AONB but could be landscape led and should not be dismissed. Could accommodate circa 100 dwellings, employment, and specialist accommodation. A detailed development brief is submitted that locates development North of Mathill Road and west of Monksbridge Road. It also promotes commercial development as well as housing.</p>	Additional sites are being promoted and will require assessment. They are within the AONB.
	DI9	Blue Fox Planning (James Millard) for Bloor Homes	<p>Land at St Collaton St Mary to the east of Higher Ridge and up to Stoke Road is promoted for development. (N.B the land is within the Future Growth Area SS2.2/ SPD3 but the eastern part of it is also a functional flood plain and Local green Space PLGS53).</p> <p>Significant housing shortfall is noted. The principle of urban regeneration is supported, but will not fully meet Torbay's needs.</p>	Noted- most of this land is within the Future Growth Area (SS2.2). The eastern part of the

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			<p>Collaton St Mary is already within a Future Growth Area, and represents a sustainable location for growth. Acknowledged that the land to the east is likely to be unsuitable for housing, but can contribute to wider environmental mitigation.</p> <p>The western portion of Bloor Homes' land is designated as PNP19 "safeguarding open countryside" in the Paignton Neighbourhood Plan. This is not a blanket restriction on development. Given the extent of the housing shortfall, and that the Council has not indicated that it intends to challenge the standard method housing need figure, it should seek to maximise development from future growth areas. On this basis the PNP cannot be a blanket ban on development.</p> <p>Plan period: Paragraph 20 of the NPPF clearly states that Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for housing, infrastructure, community facilities and conservation and enhancement. Housing is a strategic policy. The delivery of new homes cannot be treated in isolation. Housing delivery is inextricably linked to infrastructure requirements, the overall pattern and scale of development, the need for community facilities and strategies linked to conservation and enhancement. On this basis it has not been justified that 2030 is the appropriate end date for the Plan.</p>	<p>area is functional flood plain.</p> <p>Comments about Plan period noted.</p>
	DI10	Pegasus Group. (Elizabeth Bloomfield)	<p>Torbay has a pressing need for housing, coupled with under delivery. The council's significant under-delivery of housing over the Plan period to date, means that merely increasing the housing requirement is simply not a sound approach to meet any additional needs. As we set out in previous representations, the adopted strategic policies are out of date and need to be replaced. Policy SS1 and other housing policies are clearly strategic in nature.</p>	<p>Noted- comments relate to Sladnor Park.</p>

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			<p>Pegasus argue that there is between 1.37 and 1.52 years' housing supply. The Local Plan's housing strategy has failed and cannot be relied upon.</p> <p>The NPPF is clear that strategic policies should look ahead over a 15- year period, and this will necessitate an extension to the Local Plan period to c. 2040.</p> <p>Support the inclusion of Sladnor Park in growth options 2-5. It will soon be confirmed that there is an extant permission for 188 retirement living units on the site.</p> <p>Pegasus support brownfield regeneration, but note that development beyond the urban area will be needed to meet the area's housing need.</p> <p>The representation sets out details on Sladnor Park. Following the High Court Ruling, application P/2020/0315 appeal APP/X1165/X/20/3257909 will need to be redetermined to confirm there is permission for 188 units of retirement accommodation (originally approved under P/2008/1418/PA and P/2009/0240/MRM).</p> <p>The Local Plan should seek to meet the areas housing needs in full as a starting point. The Sustainability Appraisal currently reads as a pessimistic assessment. Failing to meet housing needs will have serious social and economic consequences in terms of housing unaffordability, unsustainable transport patterns, poor quality housing stock and stymied economic growth.</p>	<p>Comments about the Plan period are noted.</p> <p>The council considers that the assessment of housing supply by Pegasus is too pessimistic. 5 Year supply calculations need to reflect "realistic prospect" of delivery, and not "certainty of completion".</p>
	DI11	Marcel Venn Associates	<p>Promoting land at Lower Yalberton 21P012 and 21P067. Land to the north of these sites should be included to provide a link to Berry Acres to the north. Two additional sites to the west are also being promoted.</p> <p>It is important to boost housing supply in order to meet needs and curb house price inflation.</p>	<p>Noted that the land to the west of South Devon College and Berry Acres are being promoted.</p>

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			Would not support option 5 – it is important that housing is built in the right locations.	Will need further assessment.
	DI11	Mick Lievesley	Land at Barton Cross (west of Barton Hill Road) is promoted for development. It does not meet the requirements to be treated as an ULPA. (N.B. relates to HELAA site 21T145)	Note that the land is being promoted. The area is within the built up area, but has access and levels issues.
	DI12	Land Promotion Group. (Adam Davis)	<p>Supports Option 5: there is a need to provide housing. The Hybrid option will not achieve certainty.</p> <p>Sites Promoted:</p> <ul style="list-style-type: none"> • Land north west and south east of Churston Road, Churston Ferrers (see red line plans) attached. Sites (21B052 and land to the south (not in the HELAA), 21B)45 Part rejected in the HELAA. • Texaco Garage, Churston (21B001) • Land south of Churston (21B005) • Land at Beechdown, Collaton St Mary (21P041). 	<p>Note that significant additional sites have been promoted beyond the HELAA. Located in the Churston area.</p> <p>Impact on the setting of the AONB and settlement gap will need assessment.</p>

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	DI13	Taylor-Whitehouse Planning (Kim Walker)	Waterside Quarry – the two parcels of land have potential for 3 dwellings each, which would make the site capable of providing 6 dwellings: this is the threshold which the site would not be considered as a windfall.	The two areas' potential will be determined through detailed planning applications. Treating the sites separately would mean that they fall within the "windfall" category (i.e., fewer than 6 dwellings).
	DI14	Jon Brewer	Hayes Court, Churston is included in Option 4. Land to Elberry Lane is owned by the family, and would be available for development.	Noted.
	DI15	Heather Nicholson	Small plot of land at Norwegian Wood, Hollicombe is promoted for development of 1 dwelling. Site of refused application P/2019/1177	A single dwelling would be considered as a windfall site. Application P/2019/1177 has been dismissed at appeal.

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ID	File No.	Person /Organisation Consultee	Summary of Representation.	LPA Response
Private Individuals -				
Support Option 1: No further greenfield development/ Hybrid Option				
	P1	Marcia and Stephen Bridge	Object to development in Brixham: lack of health and social services, traffic congestion, harm to tourism, food production and wildlife.	
	P2	Jamie Barlett	Options 3,4, and 5 will harm critically important rural designations. As an urban area, Torbay is reaching the end of its capacity for greenfield expansion. Torbay's population growth is driven by inwards migration of older people. Building more houses will not meet local need. There is scope for a more radical reduction in town centre areas to regenerate and redevelop town centre areas. This could necessitate compulsory purchase. Exeter adopted a similar process at Princesshay.	
	P3	Kathryn Hebly	Torbay should raise awareness of its geological and historic heritage. This will be harmed by further overdevelopment. The coastline and green hills forming the backdrop to the coastline should be preserved at all costs. Brunel Manor should be preserved and promoted as a tourism attraction.	
	P4	Georgia Walters	Torbay does not have the infrastructure to support more greenfield development – shortage of healthcare facilities. There is capacity to reduce the town centre areas and reuse derelict and empty areas. The Local Plan should consider the impact of climate change and promote clean energy, preserve and re-wild greenspaces. Rising sea levels will be a threat. Teignbridge is doing better than Torbay in promoting a sustainable agenda.	

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	P5	Terence Kingston	Torbay does not have the capacity for more growth- it's already very congested. New towns will need to be built.	
	P6	Janet Mcleod	Disagree with the government's need figures. New homes will not be affordable to local people. Lack of infrastructure including healthcare. Loss of countryside and harm to wildlife	
	P7	Becky Lock	<p>Torbay is already overdeveloped- there is pressure on green spaces. The pandemic has shown how much outdoor recreation areas are needed. The wildlife in the area should be protected. Need to protect trees and recognize their environmental benefits. The local community has clearly expressed its views in the 2019 neighbourhood plan referendums.</p> <p>There is a need for affordable housing in Torbay. Housebuilding in the region has not reduced house prices. The pandemic has increased demand in areas such as Torbay from people seeking to move from cities. Torbay is overdeveloped compared to outer local authorities such as South Hams. Need to promote brownfield sites, reuse empty buildings, disincentive second homes and holiday home rental market.</p>	
	P8	Karen Robinson	Need more information on the type of housing – open market housing will have a much greater land take than low level apartments and are likely to be second homes. Land should be used more efficiently.	
	P9	Brian Maddock	Torbay is in a difficult position seeking to meet needs whilst not destroying natural beauty. Torbay is a small coastal area with AONB. Support a hybrid option.	

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			<p>There is a shortage of infrastructure, particularly due to older people migrating into the area. There is a significant strain on health services.</p> <p>21B017- access gate from Wayside is for agricultural use only.</p>	
	P10	Brian Harland	<p>Torbay will struggle to meet its housing target and five year supply figures. There are very few options to increase numbers. There are severe environmental and infrastructure constraints. Part of the reasons for Torbay's problems are historical. First, separation from Devon County in the mid to late 1900s has severely hampered the room for manoeuvre. If Torbay was part of the wider Devon County Council, housing numbers could be spread more easily across the county. This would also locate housing closer to where increases in jobs had occurred.</p>	
Site specific objections				
	P11	Gordon Cain	<p>Marine Car Park 21T139. The Pavilion is a listed building and can be restored through the Town Deal. Please consider alternative sites for housing, and alternative funding arrangements for the Pavilion repairs.</p>	
Site specific objection: North Seymour Drive and Great Hill, Torquay				
	P12	Teresa Slotwinska	<p>Object to sites north of Seymour Drive – impact on wildlife</p>	

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	P13	Penny Wood	<p>The Council has a duty to protect its rural areas as much as it does to meet housing land supply. Meeting supply cannot be done to the absolute detriment of rural areas, because any benefit is outweighed by other harms in planning terms. It is well publicised that local planning authorities are failing to reach the current housing targets across the country, perhaps this is the time when questions must be raised as to whether these targets were simply unrealistic to begin with and the constant building of new homes must be reined in. Particularly when the town centres of both Paignton and Torquay are ripe for future development instead.</p> <p>There is scope to reduce town centre areas to provide more housing. Objections to North Seymour Drive and Great Hill: Road safety and access, visual prominence, and wildlife impact.</p>	
	P14	Jamie Bartlett	Visual prominence of Great Hill, landscape harm, impact on John Musgrave Heritage Trail. (General comments are recorded above).	
	P15	Dr Chris Dodson	Very prominent site. Wildlife impact.	
Site specific Objections: Sites at Westerland Valley/ Kings Ash Road.				
	P16	Lesley Ann Gout and Nicholas John Gout.	<p>Object to the following sites:</p> <ul style="list-style-type: none"> •21P046 Hill Nursery Top • 21P051 Hill top Nursey • 21P061 Kings Ash Road response with Comments highlighted on the document. 	

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			<ul style="list-style-type: none"> •21P082 West of Kings Ash Road. • 21p086 Marldon Road • 21P087 land North of St James Avenue <p>Harm to landscape, ecology. Impact on Greater Horseshoe Bat habitats and wide range of other wildlife. Kings Ash Road is already at capacity. Harm to residential amenity from various sites 21P046, 21P051, 21P061, 21P082 and 21P086. Particularly object to Options 4 and 5. Lack of employment opportunities- jobs have not kept pace with housing. Healthcare is over stretched and will be impacted more by inwards migration, particularly of older people. There should be a focus on brownfield sites- including sites under construction by Midas.</p>	
Site specific Objections: Yalberton Valley				
	P17	David Hughes and Susie Gillespie.	<p>Environmental, wildlife and tourism impact. Harm to natural beauty, ancient orchards. Development should focus on brownfield sites, Traffic impact</p> <p>Heritage impact on Yalberton Valley.</p>	
	P18	Julian Reiman	<p>Berry Acres has already encroached on the Yalberton Valley. Further encroachment on the valley should be resisted- the Paignton Neighbourhood Plan seeks to <i>"Safeguarding the area because of its beauty, historic significance, recreational value, tranquillity and richness of its ecology and wildlife."</i></p>	
	P19	Daisy Wood		
	P20	Paul Strawson		

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	P21	Charlotte Thomas		
Overclose Paignton				
	P22	Louise Hill	Land is steep and there are parking problems. Object to loss of recreation land used by all age groups.	
Site specific objection: Broadsands Beach.				
	P23	Christine Pittam	Object to building on Broadsands. Environmental harm, harm to tourism.	
	P24	R K Tarling	Loss of greenfields. Impact on natural beauty, undeveloped coast, harm to ecology, loss of recreation.	
	P25	Sandra Spencer	Houses are very expensive in Torbay – Houses in this location won't be affordable to local people- the need is for affordable housing.	
	P26	M and C Healy	Impact on infrastructure and highway capacity. Conflict with tourist traffic, horses, and other highway users in this location.	
	P27	Carole and Albert Cowell	There are more suitable locations. Development should go in Paignton Town Centre to try and regenerate urban areas.	
	P28	Stephen Redman	Object to government mandates for local councils. Deaths outweigh births in Torbay so the natural trend is for the indigenous population to fall.	

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	P29	Maureen Kay	<p>The site was considered and rejected in the late 1990s but rejected.</p> <p>Impact on Broadsands Barrow neolithic chambered tomb (Scheduled Monument). Loss of public access via public footpath.</p>	
	P30	Caroline Lewis		
	P31	Andrew Edwards		
	P32	Tom Gordon		
	P33	G Reynolds		
	P34	Mrs. F Clarke		
	P35	Ms. J Lawson		
<p>Site specific objection: Summercourt, Brixham</p>				
	P36	Mary Saunders	<p>Objections due to the loss of recreation area, harm to local wildlife. The area is popular with a range of age groups including older people. There is no other local area for recreation, which will force people to drive to walk their dogs etc. There will be a knock in effect on the Berry Head SAC due to increased recreational pressure.</p>	
	P37	Richard Bull and Jennifer Cockerill		

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	P38	Lee Carter	<p>Impact on the setting of the AONB</p> <p>Loss of open space. The site fails the tests in Paragraph 99 of the NPPF: not surplus to requirements and there is no nearby replacement land.</p> <p>Loss of green space and recreation area.</p> <p>Site is a former rubbish dump, so is unsuitable for development.</p> <p>Traffic congestion in the area.</p> <p>There is scope to densify brownfield sites.</p>	
	P39	Paul Durdin		
	P40	Lindsey Read		
	P41	Carol Owen		
	P42	Lynne Taylor		
	P43	Carolyn Moulton		
	P44	Janet and C P Bradley		
	P45	Louise Harris		
	P46	Steve and Brenda Shaw.		
	P47	Ann-Marie and Dennis Hann		

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	P48	Simon Dudman		
	P49	Vera Caunter		
	P50	Neil Shillitoe		
	P51	Paula Cox		
	P53	M Healy, C Healy, and S Healy		
	P54	Carole, Albert, and Tara Cowell		
	P55	Louise Hodges		