Appendix 2 . Torbay Local Plan 2025-45: Schedule of Response to Issues Raised at the Regulation 19 Consultation

Matters arising from the Local Plan Working Party of 19th October 2026

Summary of Representations from Regulation 19 Consultation

1.2 The Local Plan Regulation 19 Consultation ran from 13th August to 24th September 2026. It received responses from 98 responders, which generated 416 representations. This paper summarises these consultation responses and the council's initial response to them. A more detailed briefing note on the issues was considered by the Local Plan Working Party on 19th October 2026 and 2 November 2026. This paper identifies the council's initial response to representations.

1.3 The key challenge for the Local Plan at Examination is the proposed level of housing, which is around 42% of the Government's Local Housing Need calculation. However, Torbay has genuine constraints. It will nevertheless be important that the Local Plan does not impose policy restrictions that go beyond the NPPF or wider environmental law. Not only will this result in an unsound Plan; they will carry very little weight in decision making.

1.10 Most objections by number were to sites in Maidencombe. Additionally South West Water noted the need for additional water infrastructure in this area. It is noted that **Brixham Town Council** has raised separate objection to the proposed housing target for the town council area. However, the target of 20 dwellings per year in Policy SDB1 and HS is significantly below the pro-rata figure for its population. This is in recognition of the environmental constraints and limited connectivity of the town. The only way for Brixham to expand outwards is into the South Devon National Landscape; and there have been significant objections from Brixham Town Councillors to proposals such as Monksbridge. Additional land has also been promoted at the reg 19 stage at Upton Manor Farm, St Marys Road, Brixham.

1.11 There is a significant objection to the Local Plan from Teignbridge District Council that the Local Plan is not doing all that it can to meet housing need. . his comment is also made by the development industry, including the Home Builders' Federation.

1.4 Most of the previously promoted housing sites received detailed representations, with an additional site proposed at Upton Manor Farm, Brixham. A supermarket and 50 dwellings are promoted at Hollicombe Gas Works, rather than the 185-dwelling scheme which has planning permission.

Promoters of mixed-use employment areas at Torquay Gateway (Edginswell and Kingsland) and Long Road argued that a greater proportion of these areas should be housing.

1.5 The development industry and ongoing work on the Whole Plan Viability Assessment indicate a serious viability challenge and the need for the Local Plan to avoid placing additional burdens on development. Conversely, the Police, NHS Foundation Trust, and DCC have sought S106 Contributions. The Police have indicated a need for an additional station serving Paignton. The need for an assessment of additional sports and recreation facilities was raised by Sport England and others. There was support for the provision of cemetery land.

1.6 Responses were received from the main Statutory Consultees. These recommend several minor modifications. There is ongoing work in relation to the Water Cycle Study and Strategic Flood Risk Assessment. Clarification is needed about whether likely significant effects of development on the Tor Bay and Lyme Bay Marine SAC can be scoped out of the Habitats Regulation Assessment.

1.7 **The 2026 National Planning Policy Framework.** The Government published a significantly reworded National Planning Policy Framework in August 2026, during the Reg 19 consultation period. It includes National Development Management Policies (NDMPs) which are distinct from the Framework's plan making policies. The Torbay Local Plan will be tested for soundness against the 2024 Framework (specifically the Test of Soundness at paragraph 36). However, the 2026 Framework takes effect immediately for decision making purposes. Development plan policies that are materially inconsistent with the NDMP's in the 2026 Framework will be given very little weight (Annex A, paragraph 1)[1].

1.8 The main immediate effect for the Torbay Local Plan is that policies which are more restrictive than the NPPF will carry very little weight unless specific and robust evidence is provided to substantiate a policy requirement. Secondly, the NPPF affects the definition of village envelopes/settlement boundaries, particularly in Maidencombe.

[1] 1 S38(6) of the Planning and Compulsory Purchase Act 2004. Planning law continues to require decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise. Powers to amend S38 of the 2004 Act to give primacy to national policy are set out in Section 93 of the Levelling Up and Regeneration Act 2023. But this has not (currently) been brought into force. The NPPF reaffirms the primacy of the development plan as the legal starting point for determining planning applications in planning law. However, the NPPF has a great deal of de facto weight.

1.8 Having considered the Reg 19 responses and having had a further Inspector's Advisory Meeting on 6th October 2026, Officers recommend that the Regulation 19 Local Plan should proceed to submission by the Government's deadline of December 2026. The above issues raise a small number of matters that require Main Modification, which are summarised in Appendix 1 Many representations can be addressed by "additional modifications," which do not go to the heart of the Plan's soundness.

Schedule of Main Modifications

1.13 The submission document will be the Regulation 19 Local Plan (with editorial corrections and other supporting documents. A schedule of proposed main Modifications is set out below, which Torbay Council will invite the Inspector to conside. Following Examination, consultation on Main Modifications and receipt of the Inspector's final report, the Local Plan will need to return to full Council for adoption.

ID	Representor	Summary of Regulation 19 Representations	LPA Response and proposed Modification where agreed.	Policies Map Change
		Local Authority/Neighbourhood Forum/ Partner Organisation		
439	**South Devon National Landscape Partnership (Ms Avril McNamara)**	Various comments requesting changes that would not amount to Main Modifications: **CER4** -clarify what constitutes an "unacceptable" impact. **L1** Clarification about conversion or extension to buildings **L2** Make policy more closely aligned to NPPF (see Dev 25 of Plymouth and SW Devon JLP). **L3** Consistency across the Undeveloped Coast (see Dev 24 of Plymouth JLP). **DE1** Mention setting of SDNL in this policy.	Make minor changes as recommended by SDNL Partnership. Note that the LPA considers these to be additional modifications, rather than Main Modifications.	No
842	**Devon County Council (Sarah Ratnage, Planning Manager)**	**Transport:** Support the Local Plan's commitment to delivering the Local Transport Plan. Make clear reference to the Local Cycling Walking Infrastructure Plan LCWIP at W2. Align Edginswell station with the Heart of Teignbridge LCWIP. **Education** – Reiterate Reg18 comments: Education contributions are sought for education facilities that need to be met out of area. **M1 and SDP 5 Object: Minerals and Waste:** Object to developments in the Minerals Safeguarding Area including White Rock and Inglewood area (H2P4). This should be addressed by a Minerals Resources Assessment. DCC recommend amendments to the wording of Policy SDP5 to ensure the layout of development is carefully considered and limits uses/developments closer to the MSA to those of	Additional modification to mention LCWIP in explanation to TA2 (paragraph 6.7-6.8). No modification recommended to Ch7 (Infrastructure), commitment will be reflected in transport evidence, delivery schedules, and Statements of Common Ground to support delivery. It would not be appropriate for Torbay s106 monies to fund Devon education. There is a net inflow of children to Torbay from Year 7; so DCC contributions for Torbay Secondary provision would be more appropriate. Objection noted but no Main Mod is recommended as the White Rock and Inglewood Area is unlikely to be used for mineral extraction. Note: Inglewood (H2P2) has planning permission and is under construction.	No

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		a less noise sensitive nature, compatible with being located adjacent to mineral extraction. S106 contributions sought to meet Torbay's needs that can only be met in DCC area.		
433	**Exeter City Council (Ian Collinson, Strategic Director for Place)**	Note that it is reasonable to state that Torbay's unmet need should be resolved at a sub-regional level through the Spatial Development Strategy. Exeter is unable to accommodate Torbay's unmet need due to Exeter's constrained boundaries and high level of its own LHN.	Noted. Work up a Statement of Common ground along the lines of that agreed by Torbay Council to ECC's recent examination.	No
838	**Teignbridge District Council**	**SS1/HS/L1 Object** that Torbay is not meeting its full Local Housing Need figure. Concerns about the assertion that unmet need can be addressed at a sub-regional level through the SDS. This would be delaying a decision. This will place any new authority on the back foot. The Plan is too reliant on a limited portfolio of brownfield sites. TDC challenge the assertion that the main driver of population growth is inward migration. Detailed comments are provided on the Growth Topic Paper. Detailed Policy comments on policies: **SDT1** It would be helpful to identify how much new development is allocated in the Plan and how much is rolled over from adopted plan. **SDT3** Torquay Gateway. The allocation of a transit site for gypsies and travellers is of some concern. The use is	See more detailed comments in the Local Plan Working Party briefing note of 2 November 2026. MM2.1 and 9.1 are intended to address a key part of the concern. MM4.2 and 4.3 are intended to respond to comments on holiday parks. Teignbridge DC adopted its Local Plan in 2026 based on the former Local Housing need figure and during Plan preparation agreed a statement of common ground with Torbay to allocate additional sites to meet some of Torbay's need once the extent of it was known. The Inspectors at the time rejected this mechanism, instead indicating that it could be dealt with at the next stage of Plan making. Notwithstanding this, many of Teignbridge's policy comments can be addressed by additional modifications.	No

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		difficult to deliver and Torbay is not on a main route for travellers. **H4** Minimum density recommend specific criteria **H5** Conversion of buildings into flats. Amendments recommended to clarify the purpose of criteria 5 and 6. **H6** Loss of homes- clarify the intention of policy. **H13** Sites for travellers. Clarify the number of transit pitches proposed (see also above). **TOS** Tourism: The policy should be more flexible. Should not have a blanket resistance to HMOs. **TO5** Object- any new holiday parks that are suitable for development should be housing sites. **SC4** Sustainable food production: Should be made more flexible to recognise development needs. **CER4** make more Torbay- specific. **L4** Valued Landscapes. The policy lacks clarity and duplicates other Local Plan designations. **NC1** Biodiversity – the policy would benefit from flexibility. **NC2** Not clear why specific mention is made to cirl buntings. **DE2** Design- the policy lacks clarity. **Sustainability Appraisal –** object to the assumption that more development will increase the level of environmental harm**.** The SA does not give sufficient consideration to policy safeguards. **Additional Landscape Sensitivity Testing** is supported. This may offer opportunities for locations where development impacts can be successfully mitigated (and ongoing work supported). Further consideration should be given to:		

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		Maidencombe – noted as medium landscape value, medium low visual value and medium visual susceptibility. The Teignbridge Local Plan allocated sites as having a higher landscape sensitivity and susceptibility. **Churston –** noted as high medium landscape value, visual value and visual susceptibility and medium landscape susceptibility.		
857	**Mid Devon District Council**	As a general observation, Mid Devon District Council is unlikely to be able to accommodate unmet need arising from Torbay, and notes the geographical separation between Torbay and MDDC.	This is not an objection to the Torbay Local Plan. It is noted that Mid Devon District Council is not contiguous to Torbay and that matters of sub-regional growth are best dealt with through the Spatial Development Strategy.	No
440	**South Hams and West Devon District Council**	Note that the Local Plan does not meet Local Housing Need. SH/WDDC sympathise with Torbay's difficult challenge balancing levels of development with the protection of Torbay's unique character and sensitive landscape. South Hams is also highly constrained with many of the constraints that apply to Torbay. South Hams is unlikely to be able to accommodate Torbay's unmet needs. H2P1/A385 Transport corridor. Collaton St Mary/Totnes Road: Future Growth Areas on the west of Paignton may increase traffic on A385 including Totnes. Request that emphasis on sustainable transport is strengthened to emphasise modal shift away from car use. H3BCG1 Archery Field: SH/WDDC Concerned about the impact of development in open countryside close to the	This is not an objection to the Torbay Local Plan. It is noted that South Hams and West Devon District Council contains significant constraints, although it contains a larger land mass than Torbay. Matters of sub-regional growth are best dealt with through the Spatial Development Strategy. The importance of sustainable transport at the West of Paignton and improved public transport links to Paignton town centre can be added as an additional modification.	No

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		National Landscape. It is recognised that Archery Field may represent one of the most deliverable options available to the local planning authority. Nevertheless, the allocation appears to sit in tension with the wider spatial strategy of the Local Plan, which seeks to prioritise regeneration and growth within the built-up area in order to minimise impacts on the natural environment. Support the Plan's approach to the South Hams SAC. H2P2 Long Road/Yalberton/Inglewood – concerned about visual impact and biodiversity impacts on South Hams. Development will require careful design and landscape led future master planning. Support deletion of former H2P3 Stoke Road Support deletion of former H3BCG3 Monksbridge due to the site's highly sensitive landscape location. The site would be car dependent.		
447	**Torbay Council: Environmental Protection**	Support the provision of **burial land**. There is a need for this. Delivery mechanism needs to be robust. **Air Quality issues**- there are air quality issues at Kings Ash Road, with very limited opportunity for improving it. There may need to be an Air Quality Action Area declared at Kings Ash Road, which will affect the deliverability of development. **ER5** Contaminated Land: revisions to policy are requested. The construction phase of development should be covered when assessing amenity impacts from noise, dust etc.	Noted Mention air quality issues at Kings Ash Road in explanation to Policy TA2. Modify Policy ER2 on contaminated land as requested: Remove reference to precautionary measures. Revise point ii to state that sites must be made suitable for intended use as a minimum. Revise advice in 8.82 to reflect Land contamination risk management (LCRM) - GOV.UK . Risk assessments	

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			should only be sought where contamination is known or suspected, or where development is particularly vulnerable to contamination. Add a sentence to Policy DE3 on constriction phase amenity impacts.	
302	**Torbay Council Culture and Events (Sports Officer)**	Welcome the Plan's commitment to active travel. Further consideration should be given to the sport and recreation infrastructure facilities needed to support 8,000 dwellings. Developer contributions should be sought for sport and recreation infrastructure where required. Provision for facilities should be made in Future Growth Areas and referenced in the Infrastructure Delivery Plan.	See Main Modification MM5.1 setting out standards for the provision of sports facilities.	
844	**Brixham Town Council**	Object that Brixham is unable to achieve its housing target of 400 dwellings over the Plan period. Middle Street is not achievable as housing.	See main discussion. Brixham's housing number is already highly constrained. Torbay Council to work with BTC to identify potential opportunities outside of the South Hams SAC and South Devon National Landscape.	
460	**Torquay Neighbourhood Forum**	Pleased that several Reg 18 recommendations have been implemented, overall, the document is generally acceptable. Para 1.46, 3.15 Additional wording requested to protect the rural setting of rural villages of Cockington, Edginswell and Maidencombe. P32: mention flood risk P32 2.1 Village envelopes: Reference also needs to be made to 'Village envelopes'. Recommend revision: "The term "settlement boundary" is defined in the NPPF, and	See main discussion above and MM2-MM3 to remove 21T065 Ridge Road from allocation H3T1 and clarify the position of Maidencombe as a rural village with an enlarged settlement boundary but noting the limited infrastructure and accessibility. Sladnor Park: issues noted. However, the site has an extant permission for a care home that can be implemented, and therefore the developable portion of the land is effectively built-up area in the 2026 NPPF definition.	

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		has the same functional meaning as “within the built up area” or “within the Village Envelope” H1T1 Support The Maidencombe Residents’ Association’s objection to 21T065 (Ridge Road) drainage, ecology, landscape and traffic/access problems with the site. It is outside the settlement boundary. The Neighbourhood Forum does not appear to raise an objection to the 20 dwellings on 21T143(Maidencombe Cross). H3T2 (21T64) Sladnor Park. Object. The approved care village does not set a general precedent for development but is confined to specific (brownfield) parts of the site. There are unresolved flooding, drainage problems with the Local Plan allocation. The site is outside the village envelope and contrary to Policy L3: Coastal Landscape. The scheme should be revised to accommodate 16 houses and two 10-unit apartment blocks, subject to drainage issues being resolved. TC3 Add criteria C to retain active ground floor frontages within primary shopping areas of St Marychurch and Preston District Centres. CERS -minor amendments requested. L1 Note that the Torquay Neighbourhood Plan will include village envelopes for Cockington, Edginswell, and Maidencombe. Request amendments to policy text and Policies map: “Village Envelopes in Cockington, Edginswell, Maidencombe and Churston/ Galmpton are		

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		defined on the Policies Map, and specified in the Neighbourhood Plans. Outside settlement boundaries and Village Envelopes, the following forms of development may be permitted, . . ."		
133	**Maidencombe Residents Association**	Object to H1T1 sites. Remove 21T065 Ridge Road . Drainage, access, wildlife impacts. Capacity of H2T1 is likely to be 20 dwellings. Object to H3T2 Sladnor Park. The Court decision and subsequent Appeal did not establish the principle of development. The 2006-2009 scheme has drainage details that would not meet current drainage, access and design requirements. Reduce the allocation to 36 dwellings to be built on the footprint of former buildings. This would reduce the drainage and flood risk. TA3: Require developments of 100+ units to have an emergency access.	See main discussion above and MM2-MM3 to remove 21T065 Ridge Road from allocation H3T1 and clarify the position of Maidencombe as a rural village with an enlarged settlement boundary but noting the limited infrastructure and accessibility. Sladnor Park: issues noted. However the site has an extant permission for a care home that can be implemented, and therefore the developable portion of the land is effectively built-up area in the 2026 NPPF definition. Addition Modification to TC2 to retain active frontages as far as possible.	
806	**Torbay Islamic Centre (Mr Yousif A Al-Nassar)**	SC6 Cemeteries. There is an identified (and longstanding) need for a dedicated Muslim burial ground in Torbay. 400-500 plots over a 20 year period. The land needs to allow burials facing the Qibla.	Noted. See MM5.2 and expanded area of search for cemetery in Torquay Gateway, linking to the proposed mobility hub.	Yes
143	**Theatres Trust**	Policy TO1 Support. Princess Theatre is mistakenly referred to as The Princes Theatre.	Note – change name as an editorial.	
349	**Brixham Railway Heritage Trail (Mr Kevin Mowat, Voluntary Director)**	Policies TAS and TA3 are reasonably sound but would benefit from specific reference to the Local Cycling and Walking Infrastructure Plan (LCWIP).	Refer to LCWIP in explanation to TAS and TA3 (additional modification)	
37	**Diocese of Exeter (Mr Ed Moffatt, Strategic Planning Officer)**	SC5 Community facilities: support. The list of facilities relating to new development should reflect the list at 5.35, particularly the provision of places of worship/spiritual	Make an additional modification in 5.35 to reflect this (Additional Modifications).	

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		facilities. It would be helpful for this to be made more explicit.		
762	**Devon Wildlife Trust**	Support overall approach to the Plan but object that a range of policies do not have stronger wording to protect/enhance nature. Large number of minor modifications and additional text/amendments requested to strengthen the Plan's protection and enhancement of biodiversity and emphasis on green infrastructure. Detailed amendments requested to: **SS1, HS, H1a, H1c Object** to "freestanding" presumption for brownfield redevelopment as these sites can be of biodiversity importance. **SDT, SDP, SDB, SDBCG policies:** Object The policies should state stronger wording to protect restore and enhance priority species and reference to green infrastructure ER2 Support THS Support NC4 – avoid use of "acceptable" level of light spillage. GIS – needs to strengthen emphasis on green infrastructure.	DWT have raised a wide range of detailed issues that do not go to the heart of the soundness of the Plan and can be accommodated to some degree by Additional Modifications to emphasise the importance of protecting nature at all stages of the planning and development process. Objection to the freestanding urban presumption is noted. However, this is similar to NDM4. These policies do not direct decision takers to disregard biodiversity matters on urban brownfield site: only directs that a high weight should be given to their sustainable location and previously-developed nature. Additional Modifications to address as many issues raised by Devon Wildlife Trust as possible without changing the overall nature of the policy or imposing unreasonable additional burdens on development.	No
		Statutory Consultee/ Infrastructure Providers		
432	**Environment Agency**	Support a strategy of 400 dwellings a year. Even this quantum of development will require innovative solutions to ensure that development does not exceed environmental capacity. Detailed comments on the Water Cycle Study and Strategic Flood Risk Assessment.	See Main Modifications MM8.1-MM8.3 Support for environment/water cycle policies noted. Make additional modification to INS to mention Critical Drainage Areas.	No

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		The approach taken by the Plan is sound in principle, but needs to be supported by a completed Water Cycle Study and Strategic Flood Risk Assessment in order to be sound. The Plan will have water-cycle impacts that require mitigation. Detailed schedule of comments. **Infrastructure related comments:** **Ch3** EA cannot confirm site-allocation acceptability until the final SFRA and supporting site assessments have been reviewed. **Ch7** EA supports the Chapter 7 approach to phasing, timely infrastructure and site-specific requirements. Request to reintroduce explanatory reference to Critical Drainage Areas, flooding, coastal change management and sewer capacity. **Ch 8** Strong concern at Ch 8 that Paignton Town Centre is stated as being a "sequentially preferable location". The Policy should be revised to state that there are other "exceptions test" reasons to develop these areas in Paignton town centre, rather than sequential test reasons.	Chapter 8 (Paignton Town Centre flooding): **Additional Modification** to amend reference to Paignton being a sequentially preferable site. Note instead that Paignton town Centre has significant flooding issues (which are identified in the SFRA) that require flood resilience measures and the avoidance of basement flats or vulnerable uses on the ground floor etc. Note however, that the main town centre location and sustainable transport hub means that the ton scores will in terms of the Exceptions Test. This does not represent a change in the council's policy from Reg 19 and is therefore an additional modification. **Infrastructure related response:** **Ch3** No immediate modification recommended: complete and agree the SFRA, then modify allocations, requirements or phasing only where the evidence warrants. **Ch7** No immediate modification recommended: concerns are considered addressed in wider policy and supporting evidence base, reference to Torbay Green Infrastructure Delivery Plan setting out green and blue infrastructure needs is included. Other comments can be addressed as additional (non-main) and editorial Modifications.	
437	**Natural England**	Holding Representation 24 September. More detailed response 5th October 2026.	See detailed response in Local Plan Working Party papers. Overall support from Natural England is welcomed. However, the council consider that	

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		NCS2, NC1, NC4, SDBCG3 and HRA. Support strategic approach to dealing with the South Hams SAC and greater horseshoe bats. Clarity is needed that Core Sustenance Zone is in addition to the sustenance and Landscape Connectivity Zones in the 2019 guidance. NC4 Light Pollution and SDBCG1 clarification and minor changes are required. Lower light levels should be required within pinch points identified in the 2026 Evidence Study. This should include a 30m buffer from a standard 2 story house to reduce light spill. NCS2, ER2, ER3, ER4, W5 and HRA Natural England support these policies. **Habitats Regulations Assessment.** The Local Plan would result in a 1% increase in combined sewer discharges up to 2024. This is not likely to result in increases to the Marine SAC, when considered alongside other works such as Drainage and Wastewater Management Plans. While available evidence supports the view that impacts from CSO spills are not likely to result in an adverse effect on the integrity of Lyme Bay and Torbay SAC, we strongly welcome measures such as water efficiency, sustainable drainage, and nature-based solutions to reduce flood risk and relieve pressure on the sewerage network. However, these are considered to be wider policy initiatives rather than mitigation measures required to address a Habitats Regulations concern.	impacts on the Marine SAC cannot be scoped out without further assessment and therefore the Reg 19 Plan and HRA should not be modified at this stage. This will be kept under review. See Main Modifications MM8.1- MM8.3 in relation to water cycle matters. Support for GIS noted.	

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		Natural England supports the improved drafting of Strategic Policy GIS: Green and Blue Infrastructure policy.		
672	**Historic England**	H1a Object. Concerns about heritage impacts. DE4 Tall buildings: object. There is a need for robust evidence where tall buildings are proposed. Note that several Conservation Area appraisals need updating. Mitigation measures for sites identified as impacting the Heritage in the Heritage Impact Assessment should be set out more clearly in the Local Plan. This applies especially to H1aP5 Paignton Hospital	Recommend ongoing discussion with Historic England to address concerns. Most matters would appear to be capable of resolution via additional modifications. However, more major changes in relation to the Building Heights Strategy will require a Main Modification. At time of writing, a MM does not appear to be necessary. Most development in Torbay is likely to be less than 18m high due to viability issues with the Building Safety Act, and the building heights study (2010) indicates that most opportunities for tall buildings re in the town centre areas. Although old, the Building Heights Study remains relevant. Recommend a proportionate update in 2027 which may necessitate further additional modifications. There is a reference to heritage assets in Policy H1a Add note at SDP2/ H1aP5 that Paignton Hospital development should take heritage matters into consideration. Policy HES Add reference to the HE's Historic Environment Strategy and updated Heritage Strategy	No
441	**Sport England**	There is no current assessment of need for a range of sparts facilities. The Playing pitch strategy is 12 years old	Issue noted. See Main Modification MM5.1	No

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		(The study needs to be less than 3 years old to be up to date). Sport England support the emphasis on active design, but there needs to be greater emphasis on co-location of facilities (rather than movement).	Local Plan Policy SC2 and SC5 are relevant to sport facility provision. See Man Modification An up to date sports strategy should be prepared, but does not go to the heart of the Local Plan's soundness, the space requirements in the Planning Contributions and Affordable Housing SPD (2022) should be incorporated into the SC2 as guideline standards. **Main Modification MM5.1** to Policy S2 (with cross reference to DE3: The provision of open space will be sought from major development with regard to table [Table xx] from the planning Contributions and Affordable Housing SPD 2022.	
436	**National Trust**	The level of constraints are noted. However, the extent of shortfall below local housing need will be an issue. Greater certainty about how unmet needs can be met should be provided. An assessment of sport and recreation needs is required.	Noted – see MM5.1 in relation to recreation. The issue of LHN is noted elsewhere. However, the National Trust appear to be raising it as a general issue rather than proposing land to help meet LHN.	No
313	**South West Water**	General support for the Plan Support the use of sustainable drainage H3T1 and H3T2 Maidencombe and Sladnor Park pose a medium impact on the existing water distribution network. The Future growth Area sites require additional wastewater infrastructure. **IN1** SWW supports prioritisation of water and sewerage infrastructure and timely capacity provision.	Support noted. Ongoing discussion is needed with SWW around water cycle matters, including the availability of potable water to meet additional growth. See Main Modifications MM8.1- MM8.3 on water cycle and drainage issues.	No

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416	**Devon and Cornwall Police** (Mr Kim Burnett)	Overall support, with a few minor editorials requested. Typo on 4.92. Refer to TC10. Support references to crime. Request minor modification to refer to fear of crime or anti-social behaviour. Refer to Designing Out Crime Officer (DOCO) not the ALO	11.5 Refer to the Designing out Crime Officer, not the ALO. This is an editorial matter rather than a Modification. 4.92 – should refer to TC10 (editorial)	No.
837	**Devon and Cornwall Police** **Buildings and Estates Department**	TC10: "Safe and welcoming town centre for all" – support. SCS: Support. The Police maintain their request for S106 contributions towards policing and provide evidence of the Reg 122 lawfulness of this request. IN1 Support (S106 contributions are requested as above). Request to make explicit that community/public-service infrastructure and planning obligations can include policing and community-safety facilities. SC5 Request a reference to "safety facilities and policing" SC5. Additional Policing Infrastructure (police station) is needed in Paignton. This could free up land at Beenland Gardens, Torquay and Brixham Police station.	Support is noted. No change to IN1 is recommended. This is considered to include a proportionate balance for public safety and potential for facilities. Given the challenges facing the Local Plan, there is unlikely to be viability for S106 contributions for policing except from developments that have a demonstrable impact on the demand for policing. Add an additional modification to SC5 to refer to policing and community safety facilities.	
847	**NHS Devon Integrated Care Board and Torbay and South Devon NHS Foundation Trust.**	Overall support for the Local Plan but request strengthening of policies to increase emphasis on S106 funding for healthcare. NPPF Policy HC1 provides a stronger emphasis on healthcare infrastructure planning.	SS1 - No modification to Local Plan recommended: Best practice process can be addressed through encouragement for early NHS engagement and healthcare assessment in masterplans/ infrastructure delivery strategies for strategic growth areas. INS / IN1 – No modification recommended: proportionate recognition of the importance of	

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		The ICB/Foundation Trust seeks contributions to address additional healthcare impacts from additional population arising from development. Exeter (and Teignbridge) Local Plan examinations support this approach. A detailed schedule of requested additional Modifications is provided. SCS Support – minor revisions requested to reflect 2026 NPPF terminology. SC1 Support- minor amendment to increase recognition of healthcare infrastructure in Health Impact Assessments SPSS1 - Add a proportionate provider-engagement and cumulative-impact requirement to relevant strategic policies. The Infrastructure Delivery Plan should identify (healthcare) capital projects, cost and funding gaps, delivery timescales, and the contribution that a development may reasonably make. INS / IN1 – Support but needs clarification. Greater emphasis on healthcare contributions is requested / minor amendment requested to give healthcare an explicit and consistent priority in Policy IN1 and paragraph 7.10. SDT/SDP policies, H2: Increase emphasis on healthcare implications, and mitigation/contribution sought from Future Growth Areas. The Infrastructure Delivery Plan should identify (healthcare) capital projects, cost and funding gaps, delivery timescales, and the contribution that a development may reasonably make. Note that some healthcare facilities have a cross-boundary impact.	healthcare is present throughout the LP / Health facilities are explicit in 7.10 (5). Given the viability challenges facing the local plan it is unlikely that health care contributions can be achieved other than where development creates a direct health care need. Health issues can be mentioned in the Infrastructure Delivery Plan.	

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848	**National Highways**	400 dwellings a year represents a 12% increase in dwelling stock over 20 years. If at Examination the headline housing figure increases significantly (e.g. doubles) the impact on the highway network will need to be assessed in more detail. Increasing numbers will affect the Strategic Road Network including at Splatford (A38/A380), Marley Head (A38/A385) and Goodstone Cross (A38/A383). Currently proposed growth levels are likely to have a low impact, but increased growth levels would need to be assessed. **Policy TAS** Welcomes the vision-led transport approach and seeks continued engagement with National Highways.	Issues noted. It is noted that headline figures above 400 dpa may impact wider transport network.	No
388	**Swifts Local Network** (Mr Michael Priaulx, Chair)	NC2 Support: strongly support NC especially the requirement for Swift Bricks and artificial nest cups.	Support noted.	
325	**Torbay United** (Rev Nathan Kiyaga)	SCS – Work with faith communities to meet the objectives of SCS and wider objectives of the Plan e.g. work with homelessness and reducing loneliness. Mention these at 5.19.	The role of faith communities is acknowledged in paragraph 5.4 and SC1. Add reference at 5.16 about the role that faith communities can play in reducing isolation and enhancing wellbeing.	
		Developer/Land promoter		
472	**Home Builders Federation**	An up to date SHLAA and Infrastructure delivery plan need to be published. Concern that reg 18 objections were not taken into account -object that there has been a lack of meaningful consultation with the development industry.	**SCS/ IN1** No modification recommended: Strategic Policy INS explicitly states 'development must provide or contribute to the infrastructure required to meet the needs that development generates...'. This is considered proportionate to address the concern in	

ID	Representor	Summary of Regulation 19 Representations	LPA Response and proposed Modification where agreed.	Policies Map Change
		Need for more transparency in relation to S of S intervention into the Reg19 Local Plan. Object that Sustainability Appraisal has prejudged that 400 dwellings is the highest level of growth that can be achieved. Viability is getting worse- Object that some of the s106 requirements that go above Building Regulations. The issue of how Torbay's unmet need can be met by neighbours is still unresolved. Object to simply relying on the SDS. BNG exemption for sites of 0.2 ha should be incorporated into the Plan. **Impact of New NPPF**: The introduction of a new NPPF will make any policies that conflict with it of limited weight. The council should consider whether proceeding with Plan submission is the best way forward. Object to Policies **SS, SDT, SDP, SDB**, Housing Policies. These policies are not sound due to the Plan not meeting the Local Housing Need Requirements and making. Object to the stepped trajectory. The key policies are into in accordance with the NPPF. Impact of Policy **H7** should (affordable housing) be assessed in light of an up-to-date assessment of viability. **H8** Self Build housing – object due to site coordination and site-completion issues. Small to medium sites may be	support of determination. **Policy IN2** No modification recommended: retain the policy subject to the whole-plan viability evidence. **Policy ER4** No immediate modification recommended: test through transport assessment and IDP evidence; modify only if that work identifies a policy or allocation change. **H11** The viability challenges for housing are noted. Minor modifications to Policy H11 can be discussed to avoid undue impacts to viability and to clarify the standards required. The Whole Plan Viability assessment will provide advice on this. However, it is recommended that the policy requirement in the Regulation 19 Publication Plan for a local connection is retained.	

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		more suitable for self-build plots, rather than seeking them as a % of larger sites. **H11** Specialist housing. Clarity needed between M4(3)a wheelchair adaptable and M4(3)b wheelchair accessible. Age restrictions can affect housing viability. Chapter 4/SCS The Plan over allocates employment land at the expense of housing. **SCS/ IN1** Object: Any S106 contributions must meet the CIL tests of lawfulness. Viability is extremely challenging for the building industry. Objects to **Policy IN2** on duplication, deliverability and cumulative viability grounds. **Policy ER4** Raises transport infrastructure capacity, mitigation and deliverability in relation to planned growth. **CERS/CERS1/ CER2** Object- No justification to apply a 100 litre per day standard. Should revert to 125 or optional 110 litres per day standard. There are serious viability challenges going above building regulations standards for energy efficiency. **THS, NC3, GIS** policies – object. The plan should be clear how natural environment policies/Green Infrastructure are intended to work together. There is a need for a clear **monitoring and review policy**.		
154	**Abacus Deeley Freed** (Chris Hayes, SYCHA Planning)	Object – There should be a strategic review of employment sites to address over supply of allocated sites and release land for housing. Could boost supply by 300+ dwellings.	These issues were discussed at the LP Working Party on 2 November 2026. Members recognised the strategic importance of maintaining employment land	

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		Land E1P8 and P9 is promoted by Abacus for housing rather than employment.	to support economic growth, regeneration and the ongoing development of strategic employment uses including South Devon College.	
669	**Andrew Pollard**	Small plot north of Great Hill Road: Ashlade TQ2 8JS should be allocated for development.	This site would be very small and below the threshold to allocate. It is outside the settlement boundary, but would be assessed on the basis of the Modified Policy L1 (and NDMP S5)	
293	**Maypool Estates** (Mr Mark Scoot)	Object to a housing target of only 400 dwellings per year; only 42% of LHN. Land at Torquay Gateway (Kingsland) is not viable ass employment and is promoted as a housing site to help achieve the proposed quantum of 550 dwellings in the Future Growth Area. The 2026 Masterplan was prepared without consultation with the landowners. Employment is not viable at Kingsland. The Masterplan does not consider infrastructure or viability constraints. Does not consider the need to increase housing numbers to meet the need. Kingsland should be reclassified as residential.	These issues were discussed at the LP Working Party on 2 November 2026. Members recognised the strategic importance of maintaining employment land to support economic growth, regeneration and the ongoing development of strategic employment uses in the most accessible part of Torbay.	
820	**Mr Roger Arscott**	Land at Kingsland, Torquay should be housing. It is not viable for employment use. The Reg 19 Local Plan over-allocates employment. Object that the proposed housing target of 400 dwellings a year is below the local housing need figure of 972 dwellings per year.	These issues were discussed at the LP Working Party on 2 November 2026. Members recognised the strategic importance of maintaining employment land to support economic growth, regeneration and the ongoing development of strategic employment uses in the most accessible part of Torbay.	
812	**Telereal Securitised Properties GP Limited** (via agent)	Chelston Telephone exchange, Goshen Road, Torquay will become available for development in the Plan period. Support the allocation of the site. H1cT20 Support	Noted – site is within the built up area.	
828	**Farm Finance ltd**. Bell Cornwell on behalf of	Land at Kingsland (adjacent reservoir) is more suitable and deliverable as a mixed-use site including residential.	These issues were discussed at the LP Working Party on 2 November 2026. Members recognised the strategic importance of maintaining employment land	

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		Housing will help meet the identified shortfall in housing numbers.	to support economic growth, regeneration and the ongoing development of strategic employment uses in the most accessible part of Torbay.	
831	**Waddeton Park,** Bell Cornwell on behalf of	Detailed site promotion of Edginswell Valley (excluding Kingsland which is promoted separately via Bell Cornwell) for 340 units including 102 affordable homes, but no school site or employment provision. Detailed masterplan and viability evidence.	Noted. Wider discussions are ongoing with Bell Cornwell about updating the Masterplan for the Edginswell Valley	
470	**Belstone Fox** Collier Planning for	Policies SS1, HS etc. are fundamentally unsound as the Local Plan has not tried to identify additional land for housing. Object to deletion of former Monksbridge, Brixham site. Former H3BCG3 Detailed promotional detail of Monksbridge (Formerly H3BCG 3) indicating that it is able to deliver housing and can overcome impacts on the South Hams SAC.	Wider objections are noted. The site was discussed by the Local Plan Working Party, and no change to the reg 19 Plan is proposed. It is noted that there is a live planning application (P/2026/0148) on the site.	
474	**ABS Limited** McMurdo Land and Planning	Land at Edginswell between Moles Lane and Marldon Road should be allocated for housing development. The site is partly brownfield .	These issues were discussed at the LP Working Party on 2 November 2026. Members recognised the strategic importance of maintaining employment land to support economic growth, regeneration and the ongoing development of strategic employment uses in the most accessible part of Torbay.	
833	**Westcountry Land** McMurdo Land and Planning	Object to SS1, SDB1, HS That the Local Plan does not meet its full housing need. The strategy for Brixham is too reliant on windfalls and does not meet needs. The Local Plan does not do enough to meeting housing supply. Noted that Westcountry Land has permission for 28 dwellings at Upton Manor Farm, Brixham. Land to the west	The issue of the Local Plan's shortfall against LHN is noted and will need robust justification at Examination. The land at St Marys Campsite/ Upton Manor Farm is within the National Landscape and close to the South Hams SAC and likely to have value for greater horseshoe bats. Accordingly, it is not proposed to allocate this land for development.	

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		is promoted for 90-100 units. This is partly previously developed land. TH6 Object to policy of reverting former holiday parks in National Landscape back to countryside fails to meet needs and to re-use previously developed land.	See main modification in relation to tourism policies (TH6).	
843	**Gallagher Developments,** Pegasus Group on behalf of.	Land at Sladnor Park, Maidencombe is subject to a current planning application for 110 dwellings (P/2025/0353) Support the preparation of a local plan, but aspirations (i.e. housing targets) fall well below housing need as required by the NPPF. (SS1/HS object). Support the inclusion of Sladnor Park H3T2 as a residential application. The site is suitable for residential development even without the site allocation. It is adjacent to the Village Envelope boundary. It is argued that Maidencombe is not a hamlet or scattered group of houses, but is a village within the definition of the NPPF. **Policy L1** object: The policy is a "self imposed" constraint. It goes beyond the scope of NDMP S5 in the NPPF and restricts development that is well related to settlements. Policy should be revised to reflect NPMP S5. **Policy HS/SS1** Object that housing delivery is substantially less than the Standard Method. Stepped trajectory will lead to a significant shortfall in the first five years. The strategy is overly reliant on urban brownfield sites.	Areas of agreement noted. There is no proposed change from the regulation 19 Local Plan position. Issue of wider shortfall against Local Housing need noted. See Main Modification in relation to Policy L1.	

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		Sladnor Park (H3T2) continues to be promoted for development and can make a substantial contribution to early delivery. Concerns about the site raised by Torquay Neighbourhood Forum e.g. flooding and drainage have been addressed.		
482	**Vistry Homes**	**H3T6** Land at Hollicombe former Gas Works, Torquay Road is promoted for development. The allocation is supported in principle but viability issues mean that 185 dwellings are no longer deliverable. This affects the soundness of the Plan if sites are not deliverable. 50 dwellings is a more achievable level of development. **Policy H3T6** includes mixed messages referring to flood alleviation, open space and biodiversity, which is unclear and confusing. Current promotion is for a mixed use development comprising retail (foodstore) and residential. The Plan should be amended to reflect this (i.e. revised to include a foodstore). **Policy SS1/HS/H1:** Object that the Local Plan does not meet housing need (LRM's objections at Reg 18 are reiterated).	See minutes of thew Local Plan Working Party of 2 November 2026. The site has flooding issues and the approved/implemented development is likely to represent the optimal use of the site.	
841	**Lidl,** Rapleys on behalf of.	Comments on HS, H2, TC5, TC6, E4 in relation to **Hollicombe** former Gas Works Site.	See minutes of thew Local Plan Working Party of 2 November 2026. The site has flooding and contamination issues and is an "out of centre" location	

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		Note that housing growth will lead to an increase in retail need. This should be expressly met in the Local Plan. **TC5** Object to a 500 sq. m threshold for impact test – the national threshold of 2500 sq. m should apply. **TC6** Object to 280 sq. m limit on out of centre retail. The policy should allow larger formats to meet more recent commercial trends. **E4** Object to the focus of E4 being on "B" uses. Retail development can have significant economic benefits. The Government recognised retail as a Class E use. This should be considered as a form of employment.	that could have a harmful impact on Preston District Centre.	
482	**Vistry Homes** Savills on behalf of	Re. **Land at Yalberton/Long Road, Paignton.** Although Local Plan will be assessed on the basis of the 2024 NPPF, the policies in the 2026 NPPF are relevant. The Local Plan is not sound, particularly in relation to housing numbers. **SS1/HS Object**: The Local Housing Need figure is not being met. Insufficient justification is provided to justify the shortfall. Clarity on the additional number (compared to the already allocated/approved number of dwellings) of dwellings is sought **SDP5** Support. Land at Yalberton is promoted for residential led development of circa 320 dwellings Detailed site promotional details are included. **SS1/E1/SDP1** Object to blanket 25% employment land requirement in Future Growth Areas. **SDP1/H2** Support principle of the Future Growth Area. Much of the area is already developed. The Vistry land can	**Shortfall against LHN** – objection noted**.** This is a key issue that will require robust justification. **Mix of proposed land uses:** These issues were discussed at the LP Working Party on 2 November 2026. Members recognised the strategic importance of maintaining employment land to support economic growth, regeneration and the ongoing development of strategic employment uses in the most accessible part of Torbay. **Strategic Policy IN1** No modification recommended: existing policy and national tests are considered to provide a proportionate route for site-specific viability assessment	

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		come forward ahead of any master planning exercise. Object to requirement for 25% employment. **H7** Affordable housing: broadly support. **H9** Self build policy – no objection so long as backed by evidence of demand. **H11** Specialist accommodation- no objection but needs to be supported by evidence of need. **CER1** Object that requirements go beyond Building Regulations standards. Needs to be justified by evidence of viability. Also scope for complication. **CER2** Broadly support but should remain proportionate. **NC2** Broadly support, but requirements should be applied flexibly **ER2** Object – there may be circumstances where water should discharge into combined sewers. **ER3** The water consumption standard of 100 litres/day needs robust justification of exceptional circumstances. **SC4** Sustainable food production – Not stated as an objection, but should be proportionate and overriding need for development should justify the release of land. **DE1** Space standards should be expressed as guidance rather than an upper policy requirement. This will affect viability. **INS/IN1** No objection in principle but developer contribution requirements should be applied flexibly and cumulative impacts on viability taken into account.		
834	**McCarthy and Stone.** The Planning Bureau on behalf of.	**Policy H7** Affordable Housing: Object – the viability of providing affordable housing has not been established through a Whole Plan Viability Assessment. Viability of older people's housing is more challenging than for general-needs housing. Detailed evidence is submitted on viability.	**H11** The viability challenges for housing are noted. Minor modifications to Policy H11 can be discussed to avoid undue impacts to viability and to clarify the standards required. The Whole Plan Viability assessment will provide advice on this. However, it is	

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		M4(3) units need to be larger and reduce the density of development and therefore viability. **H11** Specialist Accommodation for people in need of care. Object to local occupancy requirements. Older persons' accommodation has significant benefits and frees up family housing. Clauses requiring local occupancy should be deleted. **CER1** Net Zero carbon development standards – the viability of this policy will need special justification. Regard should be had to the 2026 NPPF.	recommended that the policy requirement in the Regulation 19 Publication Plan for a local connection is retained.	
852	**Andrew Rowe AR land and Planning** for Persimmon Homes. Late Representation	Reiterate reg 18 promotion of field(s) adjacent to approved housing site at Copythorne Road, Brixham: particularly field shown as F1 to increase the yield on the site from 77 to 94 dwellings. Wider promotional details from the HELAA are also included.	Noted- however the sites are within National Landscape and it is not proposed to revise the Reg 19 Local Plan in relation to this site.	
		Individuals -		
665	Mr Justin Waye	Object to the level of growth due to poor infrastructure. Prioritise brownfield first.	Noted. The Plan takes a brownfield first approach.	
666	Nigel Barker	Refer to building new schools, dentists and doctor capacity and water supply capacity. Hilly topography and road network limit scope for cycling.	Noted. The plan seeks a range of infrastructure	
20	Mr Community Campaigner David Barton	Long representation promoting traditional vernacular architecture, design codes, heritage assets, and parking.	Noted. The Local Plan promotes good quality design and protection of heritage assets. However, Mr Baron's requests would go beyond the scope of the NPPF.	
799	Miss Kira Pittuck	Hard to code and wide-ranging objections and comments. There are enough houses, object to the profit motive, roads are congested, don't rely on data collected during COVID period, housing is not affordable to young people, tackle the economic problems of Torbay.	Issues noted.	

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802	Mrs Shirley Wilson	Object to Policy H5 Conversion of buildings into flats. Insufficient attention has been paid to cumulative impact of changing the charact of a street. The policy should clarify how over-concentrations of small flats can be avoided. Support Policy H10 HMOs. Additional guidance should be provided on how the cumulative impact on amenity and character will be assessed.	Issues noted. However, S5(ii) does consider cumulative impacts.	
813	Hugh Malyon	Object to HS. 400 dwellings is not sufficient to meet the identified need of 900+ dwellings a year. There should be a stronger commitment to social housing and council housing. Need for stronger focus on urban regeneration. Increasing supply of affordable homes will assist young people to stay in the area. Need to consider cultural and environmental opportunities for people. Need for a stronger commitment to bring empty homes back into use. Environmental sustainability and the UNESCO Geopark need greater prominence. Mention protection of the Global Geopark as a key objective. Food security and the provision of fresh food should be mentioned. Reconsider putting a train station near Torbay Hospital (i.e. support for the proposed train station at Edginswell). Brixham and Paignton seafronts should not be high development zones. Biodiversity net gain should be at least 20% Developments should be carbon negative.	Issues noted. Agree that bringing empty homes back into use should be supported - make an additional modification to support this. Note in Explanation to Policy HS that measures to bring empty homes back into use are unlikely to require planning permission but will be supported as a sustainable way of boosting housing supply. There proposals do require planning permission, regard will be had to the quality of accommodation and living standards created (see Policy DE2)	No

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149	Mr Peter Carder	Policy HS Support. There are strong reasons why Torbay cannot meet the area's development needs. The approach taken by the Plan is consistent with national policy. H1a, H1c Support: Support the emphasis on sustainable town centre locations. LS and L4: Objectives of Policies LS and L4 are supported but may be difficult to achieve in practice. Object to SC4 West of Paignton Future Growth Area. Loss of BMV agricultural land.	Support noted. The Local Plan seeks to take a proportionate approach to resisting the loss of BMV agricultural land homes	
844	Frances Robinson	Brixham is unable to meet its housing target in Policy HS/BCG1. Removal of Middle Street site will make this more difficult to achieve 50 dwellings in the Town Centre. The location of a park and ride facility serving Brixham should be identified more clearly. Should not be in the National Landscape. Support the deletion of Monksbridge as a development site. Several textual/policy amendments: SDB3 -protection of national landscape should be strengthened. L3 should be amended to include stronger protection for beaches.	Noted, the proposed park and ride facility is indicated in Churston, outside the National Landscape. Refer to beaches in the explanation to L3. This is an additional (not main) modification.	
846	Graeme Mason	SDB1 Object: Object to the 400-dwelling target for Brixham. Environmental capacity and junction capacity at Windy Corner. Support the removal of Monksbridge as a housing site. Evidence base documents should be completed and published.	Noted – see above **Ch7 Infrastructure** No modification recommended at this stage: address through the IDP/evidence base and amend the Plan only where completed evidence demonstrates a need.	

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		Ch7 Infrastructure Requests completion of evidence and a Brixham-specific IDP schedule covering schemes, responsibility, funding, timing and triggers.		
620	Mr R E Harris	SS1, SDB 1 Object. Housing numbers in Brixham are too high due to road constraints and lack of supporting infrastructure.	Noted -see above	
798	Paul Oldrieve	Torbay must remain a holiday destination. The Plan needs to address the "faded grandeur" Development around Hamelin Way is well-served by infrastructure but not clear how transport can be provided to the West of Paignton. The representation appears to advocate reinstating previous proposals to extend ring-road access to the west of Paignton and to Brixham. The Plan should make provision for and consider the impact of autonomous vehicles. The Plan should allocate a specific high-tech business park.	Noted.	
457	Phil Gregory MBE	Object that the Local Plan does not meet all of Torbay's housing need.	Noted.	
		Individuals-site specific		
		H3T1 Maidencombe		
517	Bart and Julie Sewell	Object to H3T1 land at Maidencombe Cross. The land is not available for development due to a long lease controlled by the Sewells (Wright and Bird). Also, object on drainage and highways grounds.	Noted. However, retain the site since developability over the Plan period is possible if site assembly issues are resolved.	
118	David Robins	Comment - Reduction in numbers at H3T1 Maidencombe is welcome	Noted	

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		Objections H3T1 Especially the remaining area at Ridge Road (21T065). Lack of sewers in the area, drainage impacts on Gabwell and Stokeinteignhead. Transport and accessibility issues: poor and dangerous accesses onto the A379, lack of pavements, conflicts between road users including horses. Harm to wildlife including cirl buntings and bats. Loss of Best and Most Versatile agricultural land. Reducing the number of the homes from the Regulation 18 draft will affect the validity of the mitigation measures set out in the Sustainability Appraisal. The SA needs to be reconsulted upon. Cumulative conflict with H1T2 Sladnor Park. Reducing the number of homes is likely to affect the viability of development and its ability to support sewerage, drainage, highways, and other infrastructure needed to render the development viable. Conflicting views over land availability – objectors argue that the land is not available for development due to unwilling landowner or complicated ownership issues. There is no reasonable prospect that the land is deliverable. The Local Plan should focus on more accessible locations and brownfield land in the built-up area. There are unbuilt housing sites that are not viable e.g. Palace Hotel, Hollicombe. The HELAA Notes that the area has significant constraints.	Noted. See main Modifications MM3.1 to remove H3T1 Ridge Road due to highway and access concerns but retain Maidencombe Cross. Retain the Village envelope boundary as shown in the Torquay Neighbourhood Plan. A more detail assessment is set out in the Local Plan Working Party briefing note of 2 November 2026.	Yes
801	Dr Paul Barton	Object to 21T065 (Port Talland Farm/Ridge Road)		
803	Mrs Elizabeth Lamport	Object to 21T065 (Port Talland Farm/Ridge Road)		
804	Mr James Dunn	Object to H3T1/ 21T065 (Port Talland Farm/Ridge Road).		

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21	Mrs Lindsay Cox	Object to H3T1 land at Maidencombe north of Sladnor Park		
26	Mr Mark Hone	Object to H1T1 Maidencombe.		
809	Mr Andrew Rowe	Object to H1T1 Maidencombe.		
381	Miss Raph Robeson	Object to H3T1 Ridge Road.		
98	Mr Spencer Robeston	Object to H3T1 Ridge Road. Additional objection material submitted outside of Opus		
101	Roger Fearnley	Object to H1T1 Maidencombe.		
97	Mr Darin Pound	Object to H1T1 Maidencombe.		
331	Martin Hobbs	Object to H1T1 Maidencombe.		
814	Mrs Sue Moffett	Object to H3T1 Maidencombe.		
370	Miss Deborah Pitts	Object to H3T1 (Ridge Road).		
31	Miss Tessa Barton	Object to H3T1 (Ridge Road).		
114	Mrs Rachel Bell	Object to H3T1 (Ridge Road).		
11	Mr Marcos Kostalas	Object to H1T1 (all sites)		
815	Mrs Helen Saxby	Object to H1T1 (all sites)		
110	Mr Ben Scoggins	Object to H3T1 Maidencombe. Policy H3 should set a maximum number.		
259	Mrs Charlotte Warren	Object to H3T1.		
276	Mrs Samantha Vooght	Object to H3T1		
816	Mrs Liz Keenan	Object to H3T1		
807	Robert Willcock	Object to H3T1		
817	Oliver White	Object to H3T1		
242	Lynette Chapman	Object to H3T1.		
818	Ms Ursula Henkel	Object to H3T1.		
819	Mr Jordan Wallwork	Object to H3T1. Housing numbers should be maximums. Disapply density requirements outside of settlement boundaries.		

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19	Mrs Lauren Wallwork	Object to H3T1. Housing numbers should be maximums.		
365	Amica Dickson	Object to H3T1 land at Maidencombe north of Sladnor Park		
140	Mr Geoffrey Leyshon	Object to H3T1 (Ridge Road).		
16	Mr Peter Saxby	Not specified but appears to relate to H3T1		
357	Mr Ian Tucker	Object to H3T1 (Ridge Road).		
821	Mrs Janet Garland	Object to H3T1 (all sites)		
822	Jamie Bartlett	Object to H3T1 (all sites)		
29	Mrs Judith and Neil Baker	Object to H3T1 (all sites)		
823	Mr Neil Baker	Object to H3T1 (all sites)		
827	Abigail Kirk-Thomas	Object to H3T1 (all sites)		
566	John Ashcroft	Object to H3T1 (all sites)		
105	Margaret Laithwaite	Object to H3T1 (all sites)		
		H3T2 Sladnor Park		
816	Mrs Liz Keenan	Range of objections similar to H3T1: Poor access, lack of wider pedestrian infrastructure, ecological and landscape impact, drainage, and flooding issues.	Objections noted, but the site has an extant implemented consent for a 188-bed retirement village and is being actively promoted a deliverable site. The Reg 19 allocation is proposed to be retained.	
817	Mr Oliver White	Object to H3T3 as drafted. The High Court Judgement does not permit 120 dwellings as currently proposed. The implemented 188-unit retirement village has different characteristics to the current proposal. Drainage issues remain unresolved.	See above	
365	Amica Dixon	Object to Sladnor Park: highways, landscape and ecology. The area could accommodate 16 houses and 10 apartments.	See above	

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29	Mrs Judith and Neil Baker	Object to H3T2 Highways and ecological concerns, lack of drainage in Maidencombe. Poor access to facilities.	See above	
		H1cT2 and H1cT5 Land at Kingskerwell Road and Bottom Park Road Barton Hill Road		
570 - Late rep	Jon Smale	**H1cT2 and H1cT5** (former H3T9 and H3T5) Bottom Park Road/Barton Hill Road. Object. Conflict with the development plan and NPPF		
647	Miss Buckley and Mr Creber	**H1cT2 Barton Hill Road.** Object to **H1cT2** land at Kingskerswell Road r/o Barton Hill Road. Loss of green space, wildlife and visual impact. There are other brownfield parts of the area e.g. former Barton Stables that could accommodate development.		
		H3T5 Broadley Drive, Livermead		
638	Stephen and Rosalind Turner	Object to H3T5 Broadley Drive, Torquay. Reiterate objections made at Reg 18 (formerly H3T12).		