



# TORBAY FIVE YEAR HOUSING SUPPLY CONSULTATION RESPONSE 2019

October 2019

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## Torbay Council Five Year Housing Land Supply Consultation 2019: Summary of Responses.

The National Planning Policy Framework (NPPF) requires Local Planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against its housing requirement (paragraph 73). Whilst there is no legal requirement to consult on a five year supply statement, the online Planning Practice Guidance indicates that it is good practice to engage with developers, land promoters and other key stakeholders (68-015-20190722 and 68-016-20190722).

Torbay Council published its five year housing land supply position for consultation between 5<sup>th</sup> July and 4<sup>th</sup> August 2019. This was a targeted technical consultation made through email, Newsflash and the Council's website, directed at seeking the views of developers and other stakeholders about the Council's assumptions about the deliverability of sites, intentions to develop sites and related matters. It was not a consultation about growth levels or other matters that need to be addressed through the Local Plan Review.

The statement is based on 2018/19 housing monitoring and represents the situation at 1 April 2019<sup>1</sup>.

The consultation received nine responses as follows:

- **A Joint response from the three Neighbourhood Plan Forums.** This argued that the Local Plan requirement should be revised downwards due to a shortfall in the provision of jobs, and other matters; but argued that more than three years' supply could be maintained.
- **Four responses from Planning Agents promoting current major planning applications.** These argued that the Council's draft position that there was 3.3 years' supply was an overestimate of the deliverability of sites when assessed against the NPPF definition and accompanying guidance in the PPG (68-007-20190722). A range of Inspectors' and Secretary of State decisions were presented to indicate how the 2019 NPPF test of deliverability is significantly higher than under the 2012 NPPF. These responses argued that Torbay's land supply was between 1.25-2.73 years. i.e. below 3 years.
- Two responses from developers/small house builder confirming an intention to build several sites within five years (including Dairy Crest, Parkfield Road, Torquay).
- Two responses arguing that they could contribute towards Torbay's housing requirement.

These responses are set out in more detail in table 1 below, along with officers' assessment of them.

In terms of Torbay's housing requirement, paragraph 73 of the NPPF indicates that the strategic requirement identified in the development plan should be used where adopted within the last five years. In Torbay's case this is the Adopted Torbay Local Plan 2012-30, which was adopted in December 2020. Where the plan is more than five years post adoption, the Local Housing Need figure, calculated using the NPPF's standard methodology should be used. Although several years of the five year supply relate to post 2020, the outcome of a Local Plan review cannot be pre-

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<sup>1</sup> The publication of midyear updates is advised against in guidance. The Council did not publish its draft interim 5 year supply statement (December 2018), although various parties have received this through Freedom of Information requests. This document was heavily caveated as an inchoate draft and in the event the detailed 2018/19 Monitor indicated a higher number of completions in the monitor period than anticipated.

empted. If the Local Plan requirement figure were considered to be out of date, then the default position for post 2020 would have to be the standard methodology figure (i.e. 612 dwellings per year plus 5% buffer).

Several methodological amendments have been made in response to the comments received, and the updated PPG Guidance published on 22 July 2019. These include applying a 5% buffer to the backlog of under delivery and publication of the list of non-major sites with planning permission. A slight increase in the figure for minor applications without planning permission (windfalls) was also factored in. Note that the LPA does consider that windfalls may be considered in the first five years of supply, and that paragraph 70 of the NPPF does not relate solely to plan making.

By far the most significant issue raised was the extent to which major sites with full planning permission could be considered to have stalled (e.g. Hollicombe Gas Works and Torre Marine); and how far major sites without full planning permission (e.g. Devonshire Park, Collaton St Mary sites, Dairy Crest, Torquay) could be considered to be deliverable.

The Council has noted the appeal evidence and other submissions from planning agents. These do indicate a requirement on the LPA to show clear evidence that sites without full planning permission can be considered to be deliverable. This effectively reverses the previous NPPF footnote 11 starting point that all sites with planning permission could be treated as deliverable unless there was clear evidence that they were not. It is noted that the PPG (68-007-20190722) was updated during the consultation process. Officers have reassessed the sites that were disputed in the responses to consider whether they could be treated as deliverable. In the face of the more onerous definition of deliverability; and the line taken at several appeals in discounting sites where the LPA had a similar (or greater) level of evidence of deliverability than Torbay; a number of sites were removed from the schedule of deliverable sites.

This resulted in a final 5 year supply assessment of 2.5 years. It is noted that an element of planning judgement is entailed in assessing whether sites are deliverable; nevertheless Officers' advice is that a Planning Inspector is unlikely to consider there to be three years' supply. The shortfall in five year land supply is a material consideration that must be given significant weight in determining planning applications for housing (as per paragraphs 11- 14 and accompanying footnotes 6-7 of the NPPF).

It is noted that the NPPF does not replace the statutory status of the development plan as the starting point for decision taking.

**Table 1. Five Year Housing Land Supply Consultation 2019: Summary of Responses.**

Nature of organisation/ Site	Estimated Land Supply	Points Raised	Torbay Response
<b>1. Combined Neighbourhood Forums</b>			
N/A. Neighbourhood Planning Bodies for Torquay, Paignton, and Brixham Peninsula	4.4 years minimum	<p>Local Plan requirement should be reduced because jobs have not kept pace with housing.</p> <p>Years post 2020 are after the five year review period of the Plan.</p>	<p>If the Local Plan trajectory is deemed to be out of date, then housing need will be determined on the basis of the Local Housing Need Standard Methodology. This is 600+ dwellings per year and so will worsen the degree of undersupply. The NPPF does not allow for a strict linking of jobs and homes and this would be contrary to the presumption in Favour of Sustainable Development as it applies to Plan making. There has been a significant number of Torbay residents with jobs- it appears that many of these are in the Exeter market area. This highlights the importance of carrying out the Local Plan Review in close cooperation with neighbouring authorities.</p>
		<p>Brixham and Torquay NPs contain site allocations, and have protection under paragraph 14 of the NPPF.</p>	<p>Noted. Brixham and Torquay neighbourhood Plans enjoy the protection of NPPF paragraph 14. A shortfall against three year supply means that the NPPF considers the plans out of date. This must be taken into account in determining planning applications. However out of date does not mean that they carry no weight. The NPs have been through formal adoption processes and referendums.</p>
		<p>Paignton NP found no need to allocated sites but contains specific polices to support allocations.</p>	<p>The PNP does not contain site allocations. The LPA raised this issue at the Reg 19 stage and Examination. The PNP cannot enjoy the protection of paragraph 14 of the NPPF. This does not, however, render it immaterial. It remains the development plan albeit one which must be considered out of date (see above in relation to the BPNP and TNP).</p>
		<p>The supply schedule does not take adequate account of windfall sites between 6-9 dwellings and underestimates windfalls.</p>	<p>All non-major permissions are treated as being deliverable. However, agree that some allowance can be made for non-major windfall sites between 6-9 dwellings. C.f. Stride Treglown/Alder King view that windfalls should not be taken into account.</p>
		<p>Crossways and Preston Down Road can be considered to be deliverable.</p>	<p>Both sites are likely to be developable, but are not allocated in a development plan, and do not have planning permission. Therefore they do not meet the NPPF definition of deliverable.</p>

Nature of organisation/ Site	Estimated Land Supply	Points Raised	Torbay Response
<b>2.Pegasus Group/ English Care Villages</b>			
<b>Sladnor Park</b>	1.6yrs		
		NPPF requires planning authorities to meet the needs for older people. No specific provision is made and likely that the Local Plan does not meet elderly persons' needs.	This is a matter that will be addressed through the Local Plan Review. It is a somewhat separate matter to the 5 year supply situation. Policy H6 of the Local Plan deals with accommodation for people in need of care.
		Local Plan requirement can only endure until December 2020- and then need will revert to the standard methodology (2900 dwellings over 5 year period).	Noted.
		A buffer (5%) should be added to the shortfall 2012-18.	Noted- the NPPG sets this out. Amend 5 year supply trajectory accordingly.
		<b>Torre Marine</b> – should be taken out as only has outline permission.	Noted- remove Torre marine from 5 year supply schedule unless further evidence of deliverability becomes available.
		<b>Hollicombe Gas Works</b> - Although the site has detailed permission, the site appears to be stalled and there is significant doubt that it will deliver completions in the next five years.	Noted- there is doubt about delivery of the Hollicombe and therefore unlikely to meet the NPPF definition of deliverable. Removed from 5 year supply schedule.
		<b>Brixham Paint Station-Consent</b> dates from 2006. Site appears to be stalled.	Noted. Insufficient evidence that the remainder of the site is being pursued. Removed from 5 year supply schedule.
		Box B sites-Insufficient evidence has been provided to include these sites in 5 year supply. Only two have outline permission.	Noted. The 2019 NPPF definition has significantly increased the burden of proof on LPAs to show that sites without full planning permission can be treated as deliverable (see also Stride Treglown's representation). Reduce the list to remove sites where there is less than a realistic prospect of deliverability. (Retain s. of Yalberton Road, Devonshire Park, Dairy Crest, Palace Hotel). These are all being actively promoted, and have an outline application submitted or approved
		Box C- Non-major sites. Inclusion is not challenged, but the list of sites should be published.	Noted- publish the non-major sites with planning permission.
Box D- No evidence included in the five year supply about historic rate of windfall completions.	Noted- publish historic windfall rates (for site of 1-5 and 6-9 dwellings).		

Nature of organisation/ Site	Estimated Land Supply	Points Raised	Torbay Response
		But accept that NPPF para 70 does permit a windfall allowance to be included.	
		Conclude that supply of 948 dwellings can be demonstrated according to the NPPF definition. Equal to 1.6 years supply. The LPA's draft position of 3.3 years supply is unlikely to be supported at appeal.	Noted. The LPA do not agree with all of Pegasus' excisions but still note that the supply appears reasonably to be less than 3 years. On this narrow point, it is unlikely that an Inspector would support a land supply of 3+ years.
<b>3.Stantec/PBA for Taylor Wimpey</b>			
Collaton St Mary (Car Boot Sale field north of Totnes Road.)	1.28 years	PPG has been updated since the draft 5 Year Land Supply paper was published. 68-007-20190722	Noted. Amend document to reflect the latest iteration of the online PPG.
		There is a body of S of S decisions about how the definition of deliverability is being treated at appeal. Most recently Stonepath Drive, Hatfield Peverel Essex (app/Z1510/W/16/3162004). Inspectors are not counting sites without full planning permission as deliverable unless there is clear evidence to support deliverability.	Noted- see also cases cited by Stride Treglown.
		Agree with principle of including sites with full planning permission. However question inclusion of: Torre Marine (former South Devon College, Torre). Site only has outline permission. Hollicombe Gas Works – site appears stalled as permission is from 2012.	Noted. Remove sites as above.
		Sites with outline permission cannot be considered deliverable without clear evidence. LPA needs to work collaboratively with applicants to bring forward sites.  Experience at North of Totnes Road suggests that sites will not be deliverable.	Noted that recent appeal decisions have taken a hard line on discounting sites without full planning permission.  Delete sites where there is no clear evidence of deliverability. However the NPPF retains the wording "realistic prospect" and it is considered that there is sufficient clear evidence to retain: South of Yalberton Road, Devonshire Park, Dairy Crest, Palace Hotel.

Nature of organisation/ Site	Estimated Land Supply	Points Raised	Torbay Response
		<p>Following sites should be removed from 5 year supply schedule without clear evidence that reserved matters/ permission will be granted:            South of Yalberton Road, Devonshire Park, Little Blagdon, Collaton St Mary, Victoria Centre , Dairy Crest, Hatchcombe Lane, Palace Hotel, Conway Court, Westhill Garage, St Kildas, Land North of Totnes Road- Bloors and Taylor Wimpey, Torbay Holiday Motel. (Removal of 747 dwellings from deliverable list).</p>	
		<p>No information of minor sites with full planning permission – but agree that they can be counted towards five year supply.</p>	<p>Noted- publish the list of non-major sites with planning permission.</p>
		<p>Windfalls are not included in the definition of deliverable sites. NPPF paragraph 70 relates to Plan making. If they are included, windfalls should only apply to years 4 and 5 of the trajectory.</p>	<p>Publish historic windfall data. Noted that the test for windfalls is “compelling evidence”.</p>
		<p>If current outline application at Collaton St Mary is approved, it could contribute towards five year supply.</p>	<p>Noted.</p>
<b>4.Boyer for Bloor Homes.</b>			
<p>North of Totnes Road, Collaton St Mary</p>	<p>2.73-3.05 years</p>	<p>Government target is to boost housing supply- 300K per year target.</p>	<p>Noted</p>
		<p>The Five year supply schedule needs to be updated to reflect most recent PPG</p>	<p>Noted-see above</p>
		<p>Local Plan Review is due by 2020, after which time the standard methodology will set a minimum number of dwellings. This figure is 612 dwellings a year.</p>	<p>Noted. The appropriate future level of growth will need to be considered as part of the five year review of the Plan. However it is noted that the standard methodology states a higher level of need than the Local Plan and meeting this is a NPPF test of soundness (NPPF paragraphs 11b), 35a) , 60 , footnote 19; unless met in neighbouring areas.</p>
		<p>Buffer needs to be added to the shortfall since 2012. PPG 68-031-20190722</p>	<p>Noted – add 5% buffer to the shortfall</p>



Nature of organisation/ Site	Estimated Land Supply	Points Raised	Torbay Response
		A 10% buffer should be applied as the Council is seeking to establish its supply through an annual position statement. NPPF 73b)	Typographical error in draft statement is noted – NPPF paragraph 73 b) is relevant. ` The LPA cannot “demonstrate a five year supply” through an annual position statement. LPAs need to update annually their 5 year supply position (as per NPPF73). Therefore a 5% buffer is appropriate.
		Onus is on LPAs to provide robust up to date evidence that major sites without full planning permission are deliverable – Appeal at Green Road, Woolpit APP/w3520/W18/3194926	Noted.
		Hatchcombe Lane appears to be stalled- permission expired in 2014 (P/2010/0452).	Noted- the site is being promoted but a new application will be needed and there are outstanding access issues. Remove from 5 year supply.
		Insufficient evidence to include the following sites as deliverable: Palace Hotel Conway Court Westhill Garage St Kildas	Noted. In light of higher test for treating allocated sites without full planning permission as deliverable, remove from 5 year supply Except Palace Hotel – current application for redevelopment. Residential element likely to come forward at an early stage to pump prime hotel.
		Details of non-major sites with permission should be published. But agree that these are deliverable in principle.	Noted- publish list of non-major approvals.
		Housing supply is between 2.86-3.05 years depending on assumptions used. Boyer’s representations would reduce figure to less than 3 years.	
		Council should work with developers to approve Bloor Homes ‘ site at Collaton st Mary- capable of providing 45 completions in the 5 year period	Noted
<b>5.Stride Treglown / Alder King for Abacus/Deeley Freed</b>			
<b>Inglewood</b>	1.25yrs	Query 2019 completions- appear high compared to the December 2018 interim draft.	The 2018 interim draft was not published because it was a partial picture and was only revealed under FOI with a caveat that it was a partial document. The 5 year supply statement is based on 2018/19 housing monitoring data.

Nature of organisation/ Site	Estimated Land Supply	Points Raised	Torbay Response
		Undisputed that there is a 5 year supply shortfall- the presumption in favour of sustainable development must be applied.	
		Less than 3 years supply can be demonstrated. Protection for Neighbourhood Plans under paragraph 14 of the NPPF has fallen away and policies that relate to housing must be considered out of date.	Noted that a lack of 3 years' supply means that NPPF 14 cannot be applied to neighbourhood Plan policies. However, the neighbourhood Plans remain part of the development plan.
		Lack of action plan	Action Plan has been submitted and is available at <a href="https://www.torbay.gov.uk/media/13237/torbay-housing-delivery-test-action-plan.pdf">https://www.torbay.gov.uk/media/13237/torbay-housing-delivery-test-action-plan.pdf</a>
		Accept that the Local Plan requirement remains relevant until December 2020- but after that time the standard methodology will apply – calculated at 700 dwellings per year. Reduces supply down to 1.07 years.	Noted in principle- but the standard methodology figure is currently (2019) 612 dwellings per year. The 700 dpa figure appears to be based on rounded- up figures. The figure may have changed by next year.
		List sites in Box C & D	Noted – see above. Sites in Box C published. Figures in Box D use averages, so no sites can be listed.
		Buffer should be applied to backlog	Noted- see above. Add 5% buffer to the shortfall.
		Update the reference to PPG to the latest test in the PPG (published 22 July). Noted that the revised PPG sets a high bar for inclusion of major sites without full planning permission in the 5 year supply.	Noted- update.
		Torbay's evidence of sites included in 5 year supply schedule does not meet the NPPF/PPG tests. Reference made to Stone path, Hatfield Peverel, Essex recovered appeal- APP/Z1510/W/16/3162004 Secretary of state had ruled that the following could not be included in the 5 year supply for sites with outline permission: -Sites where there was no pro-forma with developers setting out delivery	Noted- Agree (reluctantly) that the NPPF definition of deliverable is significantly higher than the 2012 NPPF definition and is being interpreted strictly in the appeal etc. decisions that the LPA is being made aware of.

Nature of organisation/ Site	Estimated Land Supply	Points Raised	Torbay Response
		<p>-Sites where new applications had been submitted but not determined which sought to replace the outline.</p> <p>-Sites where reserved matters had not been submitted.</p>	
		<p>Remove 3 sites from box A sites of 10+ with full planning permission:            South Devon College, Torre Marine            Hollicombe Gas Works            Brixham Paint Station, Kings Drive</p>	<p>Issues noted –see above.            Torre Marine (Former South Devon College)– remove as insufficient evidence to demonstrate deliverability.            Hollicombe Gas Works- Agree that not sufficient evidence of progression is available to meet the NPPF test.            Paint Station, Kings Drive- Not sufficient evidence of progression to justify inclusion in 5 year supply schedule.</p>
		<p>Remove all sites from box B: allocated and other sites with demonstrated intent. (-747 dwellings). Insufficient evidence to demonstrate deliverability.            Also object to use of standard rate of completions.            Neighbourhood Plan allocations cannot be counted as deliverable without similar level of evidence. (Remove Hatchcombe Lane, Palace Hotel, Dairy Crest , Conway Court, Westhill Garage and St Kildas</p> <p>Remove Victoria Centre- insufficient evidence that the site is deliverable.</p>	<p>South of Yalberton Road (Berry Acres) is subject to a a reserved matters application P/2019/0173/MRM Therefore the site has firm evidence of progress towards an application and meets the PPG criteria for deliverability.            Similarly Devonshire Park has a reserved matters application P/2019/0278/MRM</p> <p>Dairy Crest and Palace Hotel are also considered to be deliverable.            Remove Victoria Centre. Site does not have planning permission. Although the Authority has undertaken to deliver the site for other purposes, the specific and tests of the NPPF definition of deliverable cannot be met.</p>
		<p>Agree 298 for box C small sites?</p>	
		<p>Windfall figures (box D) should be discounted</p>	<p>See response to Neighbourhood Forums above. There is clear evidence that (small) windfall sites do arise in Torbay. The tests in NPPF paragraph 70 can be met.</p>
<b>6.Marcel Venn Associates</b>			
<b>Lower Yalberton</b>		<p>Torre Marine and Hollicombe unlikely to be deliverable in 5 years.</p>	<p>See above</p>
		<p>Category B sites (without full planning permission) should not be considered</p>	<p>Noted- figures have been revised downwards. See above.</p>

Nature of organisation/ Site	Estimated Land Supply	Points Raised	Torbay Response
		deliverable- more likely to come in year 6-10 of the trajectory.	
		Land at Yalberton Camp site is suitable for development –circa 40 acres.	Noted- will need to be considered as part of the HELAA/Local Plan review.
<b>7.Business Location Services</b>			
St Marys Camp Site, Brixham	N/A	Letter promoting St Marys Camp Site, Brixham for up to 150 dwellings	Noted. The site would need to be considered through the HELAA/Local Plan Review.
<b>8. McCarthy Contractors</b>			
Various.	N/A	<p>Confirms intent to build out all sites listed within 5 yrs.</p> <ol style="list-style-type: none"> <li>1. P/2019/0141 - The Former Bakery Barn, Chilcote Close, Torquay – 11 units</li> <li>2. Paignton Police Station P 2018 0881 – 36 Units</li> <li>3. P/2018/0962 - 213 St Marychurch Road, Torquay – 17 Units</li> <li>4. Planning Application No P/2016/1039 Park Hill Road – 1 unit</li> <li>5. P/2019/0283 – Parkfield Road, Dairycrest Site – 43 Units</li> <li>6. CN/2018/0116: Limestone Court, St James Road, Torquay – 2 units</li> </ol> <p>Dependent on Brexit.</p>	Noted
		If access difficulties at Bottom Park Lane could be overcome then site would contribute towards five year land supply,	Noted. Work with McCarthy's to see if access issues can be overcome. The land is part of the Scotts Bridge Barton area and should be serviced through the Scotts Bridge area (Darwin Close) but this may be subject to ransom strip. McCarthy's need to investigate possibility of gaining access through Darwin Close before LPA could agree to a new access onto Barton Hill Road. Also, the site gradients need to be investigated.
<b>9. Eden Land Planning</b>			
Former Torbay Holiday Motel, Totnes Road, Collaton St Mary.	N/A	Application being pursued. Confirm that delivery timescale of 10 units in the five year timescale (and remainder 2022/23 is realistic.	Noted

**TORBAY FIVE YEAR LAND SUPPLY**

Site	5 Yr Yield	2019/20	2020/21	2021/22	2022/23	2023/24	Notes	Post Consultation Notes
<b>A. Sites with 5yr yield of 10+ units with Full Planning Permission</b>								
White Rock, Paignton	130	48	42	40			P/2013/1229 permitted 17.04.14 - 310 units. 180 units complete@2019. Proposed completion rate of circa 40 per year.	No comments
South Devon College (Torre Marine), Torquay	75				75		75 units (P/2016/1047 permitted 17.11.17). Site has extant planning permission, discussions underway on how to deliver site. Flatted development.	REMOVE FROM 5YS. P/2016/1047 is an outline permission. Not sufficient evidence of progression on site. Objections to inclusion of site from 3 respondents.
Hollicombe Gas Works	92				46	46	P/2008/0114 permitted 11.10.12. P/2015/0999 permitted 18.11.15 refers (C of L for section of road built in accordance with original application implements permission). 185 units in total. Site remedial works completed. Flatted development.	REMOVE FROM 5YS. Not sufficient evidence of progression/delivery within 5 yrs. Objections to inclusion of site from 3 respondents.
Land off Luscombe Road	68		30	38			P/2018/0522 P/2014/0938/MOA P/2019/0291/MRM. Site preparation work underway.	No comments
Former Paignton Police Station, Southfield Road	46		46				P/2017/1117/OA & P/2018/0881/RM permitted 04.03.19. Site cleared.	No comments
Roebuck House, Abbey Road	43	43					P/2018/0468 - prior approval. 43 units. On site. Units being marketed for occupation Autumn 2019.	No comments
Yannons Farm, Brixham Rd	24	24					Various Applications. Apps still to be implemented/completed; P/2014/0983/MOA 192 units, most recent RM P/2016/0610 140 units. Total 211 units. 187 units Comp, 24 units U/C @ 2019.	No comments
Brixham Paint Station, Kings Drive	22		10	12			H1.019 P/2006/1066 permitted 30.08.07 (35 units in total) Part built. CN/2016/0086 permitted 11.01.17	REMOVE FROM 5YS. Not sufficient evidence of progression/delivery within 5 yrs. Objections to inclusion of site from 2 respondents.
Wall Park, Wall Park Road	21	21					P/2013/0785 permitted 05.06.15 - 165 units total PLUS P/2016/0057 additional 8 units. On site. 152 units complete @ 2019.	No comments
South Devon Hotel, St Margarets Road	20	20					P/2017/0888. On site. 10 Complete.	No comments
8-18 Tor Hill Road	19	19					P/2017/0290 permitted 28.04.17. On site	No comments
Former B&Q, 41 Tor Hill Road	15	2	13				P/2016/0730 permitted 15.03.17 P/2019/0131 MVC Reduces units to 15. Currently on site.	No comments
Land R/O 107 Teignmouth Road	12	12					P/2016/0599 permitted 31.05.17. On site	No comments
Queensway, Torquay	12	6		6			Part under construction P/2007/2095 permitted 20.05.08	No comments
Suite Dreams Hotel, Steep Hill, Maidencombe	10		10				P/2018/1216 permitted 15.02.19. Site vacant and fenced off.	No comments
18 Babbacombe Road	10	10					P/2017/0178 permitted 05.05.17 & P/2017/0729 permitted 23.08.17. On site	No comments
Land R/O Broadway, Dartmouth Road	10		5	5			P/2015/0097/OA P/2018/0332/RM permitted 20.08.18	No comments
Land R/O 16-26 Castor Road	10		5	5			P/2018/0852/RM permitted 23.01.19	No comments
							P/2016/0947 allowed at appeal 03.08.17	No comments
	<b>639</b>	205	161	106	121	46		

<b>B. Allocated and other sites with demonstrated intent</b>								
Land South of Yalberton Road (Berry Acres)	150		20	40	45	45	Allocated in Local Plan as part of Future Growth Area. P/2014/0983/MOA for 192 units permitted 07.09.18. P/2019/0173/MRM pending consideration.	AK suggest could be included with clear evidence of delivery. 2 respondents object to inclusion.
Devonshire Park, off Brixham Road	150		20	40	45	45	Allocated in Local Plan as part of Future Growth Area. P/2014/0947 255 units in total permitted 22.03.16. 150 units only shown in 5 yr supply - proposed completion rate 40 per year. Difficult previously developed site, but enabling retail development under construction. P/2019/0278/MRM pending consideration for up to 255 residential units.	Remediation work completed. Notes should read completion rate of 'circa' 40 per year. AK suggest could be included with clear evidence of delivery. 2 respondents object to inclusion.
Collaton St Mary (Little Blagdon)	65				25	40	Allocated in Local Plan as part of Future Growth Area. Application submitted for junction. Successful application for Land Release Fund funding. Preparatory site investigations being undertaken. Application due to be submitted 2020.	REMOVE FROM 5YS. Not sufficient evidence of progression/delivery within 5 yrs. Objections to inclusion of site from 3 respondents.
Victoria Centre	60					60	On Brownfield Register. Design Brief being prepared. Successful application for funding to Land Release Fund. Developer intends to deliver on site within 5 years.	REMOVE FROM 5YS. Not sufficient evidence of progression/delivery within 5 yrs. Objections to inclusion of site from 3 respondents.
Dairy Crest Site, Parkfield Road	43					43	NP site NP3. P/2019/0283 outline application submitted for up to 43 units. Developer has proven track record of delivery. Site investigation works have taken place.	Approved at Planning Committee since consultation document prepared. Evidence from developer that site will be built within 5 yrs. Objections to inclusion of site from 3 respondents.
Hatchcombe Lane	50					50	P/2010/0452 permitted but expired. TNP allocated site. 2019 pre-app discussions.	REMOVE FROM 5YS. Not sufficient evidence of progression/delivery within 5 yrs. Objections to inclusion of site from 3 respondents.
Palace Hotel, Babbacombe Road	38					38	TNP allocated site. 2019 pre-app discussions. Community consultation undertaken.	Full planning application submitted since consultation document prepared. Objections to inclusion of site from 3 respondents.
Conway Court	14					14	TNP allocated site. 2019 pre-app discussions.	REMOVE FROM 5YS. Not sufficient evidence of progression/delivery within 5 yrs. Objections to inclusion of site from 3 respondents.

B. Allocated and other sites with demonstrated intent							
Westhill Garage	15					15	REMOVE FROM 5YS. Not sufficient evidence of progression/delivery within 5 yrs. Objections to inclusion of site from 3 respondents. REMOVE FROM 5YS. Not sufficient evidence of progression/delivery within 5 yrs. Objections to inclusion of site from 3 respondents. REMOVE FROM 5YS. Not sufficient evidence of progression/delivery within 5 yrs. Objections to inclusion of site from 3 respondents. REMOVE FROM 5YS. Not sufficient evidence of progression/delivery within 5 yrs. Objections to inclusion of site from 3 respondents. REMOVE FROM 5YS. Not sufficient evidence of progression/delivery within 5 yrs. Objections to inclusion of site from 3 respondents.
St Kildas	12					12	
Land North of Totnes Road (Bloor Homes)	55		20	35			
Land to the North of Totnes Road (Taylor Wimpey)	55		20	35			
Former Torbay Holiday Motel, Totnes Road	40		10	30			
	<b>747</b>	0	40	130	258	319	

C. Contribution from minor applications with PP	
N/S SITES (SITES OF 6-9)	40
N/S SITES (SITES OF UNDER 6)	108
U/C SITES (SITES OF 6-9)	41
U/C SITES (SITES OF UNDER 6)	109
	<b>298</b>

D. Extra Windfalls		283
(sites of under 6)	(average 100 per year over 5 yrs "top up" of 'under 6' in C.)	Add windfall figure for sites of 6-9 dwellings

FIVE YEAR REQUIREMENT	2997
ANNUAL REQUIREMENT	599.4
FIVE YEAR SUPPLY	1967
<b>SUPPLY (YEARS)</b>	<b>3.28</b>

Sites not included in box 'C' are those with no 'activity' on the site within the last 10 yrs (this could be a completion or where the site has remained stagnant, with a permission which is at least 10 yrs old).