

TORBAY LOCAL PLAN

A landscape for success:

The Plan for Torbay – 2012 to 2032 and beyond

PROPOSED SUBMISSION PLAN (FEBRUARY 2014)

TORBAY COUNCIL RESPONSE TO REPRESENTATIONS TO PROPOSED MAIN MODIFICATIONS TO THE SUBMISSION LOCAL PLAN

REPRESENTATIONS BY MODIFICATION/POLICY NUMBER

Torbay Council - 22 April 2015

Explanatory note: Torbay Council Response to Representations to Proposed Main Modifications to the Submission Local Plan

Summary of this document

This document sets out the Council's comments on the consultation responses to the Proposed Main Modifications to the Torbay Local Plan 2012-32 and beyond "A landscape for success". These were the subject of public consultation between Monday 9th February and Monday 23rd March 2015.

Representations on the Main Modifications and comments of the Council will be considered by the Inspector conducting the Examination of the Local Plan.

Summary of Representations to Proposed Main Modifications

Background

The Local Plan was considered at an Examination Hearing between 18th-20th November 2014. The Inspector's Initial Findings were received on 15th December 2014. In the interim the Council had submitted additional information to the Inspector including a Schedule of suggested Main Modifications to the Proposed Submission Plan' (11th December 2014). Following receipt of these Suggested Modifications, the Inspector issued Further Findings on 23rd December 2014.

The Council published a Schedule of Proposed Main Modifications for consultation in February 2015, drawing on the Inspectors' Initial and Further Findings. The Proposed Main Modifications relate to matters that go to the heart of the Local Plan's soundness. In summary they relate to:

- Adjustment to increase the overall housing numbers to 10,000 dwellings between 2012-32
- Clarification of process to bring forward site allocations plans if Neighbourhood Plans are not submitted by October 2015, or if there is a danger of five year supply not being maintained.
- New proposed Future Growth Area south of White Rock
- Identification of additional potential housing sites for consideration through Neighbourhood Plans
- Reduction to the threshold for testing retail impact of convenience (food) stores.

A Schedule of “Additional Modifications” dealing with matters that were not considered to go to the heart of the Local Plan was also published for consultation alongside the Main Modifications.

Responses Received on the Proposed Main Modifications

The Main Modifications generated significant public interest, with around 280 individuals and organisations making comments. By volume of objections, the proposals for development at Steps Cross Torquay and White Rock, Paignton generated the most objections (145 letters plus a 75 signature petition, and 91 letters respectively). However, a number of other issues have been raised by representations.

The main issues raised by the Proposed Main Modifications consultation are as follows:

- Objections to growth levels from Paignton Neighbourhood Forum and others. This includes a detailed assessment of the 2012 based household projections, and infrastructure/ environmental capacity (Principally MM1 and Policy SS1).
- Objections by the three Neighbourhood Forums about Modifications for the Council to prepare site allocation plans should neighbourhood plans not be submitted by October 2015 (Principally MM2).
- Objections by Natural England about the likely significant impacts of additional sites identified in the Main Modifications both in terms of greater horseshoe bats ((South Hams Special Area of Conservation) and impact on the candidate Marine Special Area of Conservation. The Council is in discussion with Natural England and has commissioned additional ecological work to assess whether these objections can be overcome (Principally MM1 and MM3, Policy SS1 and SS2).
- Objections to the identification of Steps Cross, Torquay as a potential housing site on the basis of loss of recreation facility, traffic impact and effect on nearby schools. (145 emails/letters and a petition with 75 signatures). The Council has discussed this matter with Sport England and colleagues in Residents and Visitor Services. It is considered that investment in the nearby King George V playing fields can address NPPF paragraph 74 issues relating to Steps Cross (MM9 and MM14).
- Objections to the identification of land south of White Rock as a Future Growth Area from organisations and individuals, on the basis of landscape, ecology, transport and the implications of the 1997 Secretary of State’s Decision, which was considered by many to remain relevant (91 letters as well as comments by organisations such as Natural England). Some house builders argued that Collaton St Mary is a less constrained area for additional growth. There were also some comments from house builders about the deliverability of development on car parks (Principally MM3).
- Support for the identification of St Marys Campsite, Brixham as a potential housing site. However, objections have been received from environmental organisations (including Natural England) about harm to greater horseshoe bats. This is also reflected in further work on the Council’s Site Assessment HRA (Principally MM14).

Broad Conclusions on the Implications of Representations Received

Basis for conclusions

The Council considers that it is in the overriding interest of delivering sustainable development in Torbay that a robust and sound Local Plan is adopted as quickly as practicable. The Submission Version of the Torbay Local Plan, with the changes agreed before and during the Hearing, evidently provides a robust starting point for the way in which this can happen.

To help achieve this objective, the Council has positively and proactively explored options for the provision of housing land in Torbay. This work has been supported by a substantial amount of evidence commissioned by the Council. The evidence relating to environment, biodiversity and infrastructure supports the Council's position, as set out in the Submission Version of the Local Plan, that Torbay can accommodate between 8 – 10,000 new homes during the Plan period.

The Council's advice, before and during the Hearing, was that provision of additional housing land (above that proposed in the Submission Version of the Plan) was likely to breach the Bay's environmental limits. This advice was based on evidence available at that time, including assessment of other options/ locations for growth in the Bay, and a detailed knowledge of Torbay's environmental characteristics. Torbay's environmental sensitivity is acknowledged in the Inspector's Interim and Further Findings. The Council's own work and responses to consultation on the Main Modifications confirm that provision of significant additional housing land, above that previously identified, might - on the basis of evidence available at this time - breach the Bay's environmental capacity for growth. The responses to consultation also suggest that, to achieve the level of certainty required for allocation, specifically for sites promoted by land owners at the Hearing, further evidence (on ecology, landscape impact and agricultural land) is needed to meet the requirements of European legislation and national planning policy. That evidence, specifically on ecology, will not be available until at least October 2015; any delay in the progression of the Examination to obtain this information would work against the need for adoption of the new Local Plan to take place as soon as possible.

Possible ways forward in relation to housing growth

In the light of the representations received on the recently published Proposed Main Modifications to the Submission Local Plan, the Council has had to give careful consideration to the concerns raised by allocating Land South of White Rock as a key additional housing site, and to the implications for the Local Plan.

If the Inspector is minded to explore further the potential offered by White Rock, in order to maximise opportunities to meet the 10,000 homes target sooner rather than later, an option could be to retain the proposed Future Growth Area extension into land south of White Rock but on a more restricted site area. This is illustrated on the Plan in Appendix 1. This would correspond only to the area being actively promoted by Abacus / Deeley Freed and within the developer's control (Phase 1). The Council believes,

however, on the basis of advice to date, this option to be less than satisfactory. This is because it may be at risk of challenge due to the likely environmental impacts of such development, and lack of certainty about the extent of mitigation in compensation for such impacts. Such a challenge could in turn undermine adoption of the new Local Plan.

Nevertheless, because such an approach would necessarily be required to comply with policies in the Submission Version of the Plan (as amended by the Proposed Modifications), the risk of challenge and of unacceptable environmental impact might be reduced, particularly if reinforced through an agreement to test the scale and nature of growth within Phase 1 through masterplanning based on provision of further evidence. Given the arable use of land to the north of the site and predominantly pasture land to the south (and thus more likely to have greater ecological value), it may also be prudent to limit growth to the northern part of this reduced Future Growth Area extension, and require ecological and environmental enhancements to the southern part of the site. Such a requirement would provide a guarantee of on-site mitigation, a stipulation that would necessarily be included in the Local Plan.

If this approach were taken the resultant masterplan could then be adopted by the Council, as a Supplementary Planning Document, within 5 years. As suggested above, this approach accords with the Council's approach regarding Future Growth Areas at Torquay Gateway and Collaton St Mary. The policy wording agreed with Natural England, before and during the 2014 Hearing, would ensure environmental impacts are taken into account and mitigation work undertaken, and that significant development would not proceed if environmental impacts could not be mitigated. At this stage, given the uncertainty over the potential scale / nature of development and environmental impacts, any such allocation would clearly need to be subject to the caveats set out in Policy SS2, SS8 and NC1. This approach would provide a greater degree of certainty (than non-allocation) that up to 9,760 new homes could be provided over the Plan period.

Council's preferred approach

Notwithstanding the above possibilities, the Council believes the most expedient way forward is to exclude from the Plan both the allocation of the new site on land south of White Rock and the additional 'Appendix D' housing site at St Mary's campsite. It is the Council's view that such changes to the Proposed Main Modifications would not require further advertisement and consultation. The Council considers it unlikely that further consultation, or indeed a further Hearing to cover land at White Rock in particular, would reveal any more issues or evidence than already available and taken into account. However, they would evidently need to be considered by the Inspector and addressed in his Final Report. The Council has set out below the changes it proposes to the Main Modifications. These proposed changes have been informed by further evidence (for example regarding ecology) and the responses to public consultation on Main Modifications. The Proposed Main Modifications, as amended where indicated in the schedule below, represent the changes that the Council wishes to be taken forward into the Adopted Local Plan via the Inspector's Final Report.

This approach would allow the Plan, with the inclusion of other acceptable sites put forward by the Council in the Main Modifications consultation document, to provide for 9430 new homes (i.e. 8950 plus some previously 'excluded' sites) during the Plan period. A full

review of the Plan, in 5 years, would include an assessment of the potential offered for further growth by the inclusion of land south of White Rock, building on the work already undertaken and expanding that work in the meantime, particularly through the collection of additional critical ecological evidence. Sufficient land is committed within the Plan to maintain a rolling five year supply of housing. This is the approach that the Council wishes the Inspector to take forward to his Final Report.

In conclusion, the Council believes that at this stage it would be prudent for the new Local Plan to provide for 9430 new homes. That number could then be increased in due course, and the annual rate of delivery recalculated, depending on the outcomes of additional survey work and masterplanning work for land immediately south of White Rock. The Council considers there is scope for new homes, commercial space and infrastructure and ecological / environmental enhancement on this land, and the Council supports a positive planning framework to help bring that forward. Taking a precautionary approach to such growth, this might comprise one third of the site reserved for mitigation and two thirds available for development. However, until the scale, type and impacts of that development are better understood it would be premature to be specific about the number of new homes to be added to the baseline of 9430.

The responses below should be considered in the context set out above.

Full Objectively Assessed Need (FOAN). The objections made about the overall growth levels and strategy are similar to matters raised in previously stages. These have been discussed in the Council's Growth Strategy and Capacity for Change Topic Paper (SD24) and the Housing Requirements Topic Paper (PBA 2013, SD56). It is noted that the 2012 based (2015) Household Projections are lower than the Interim 2011 Based Household Projections. However, based on good evidence, the Council is planning to achieve economic recovery and growth. Consequently, the Council accepts the Inspector's Initial Findings view that FOAN will be higher than the household projection figure if economic growth is achieved, as per the Housing Requirements Report.

Trigger point for preparation of Site Allocation Plans. In response to Neighbourhood Forums' objections about the trigger point for submission of Neighbourhood Plans, it is recommended that the deadline be extended from October 2015 to 31 March 2016. It appears from monitoring and developer interest, that some development on sites indicated in Future Growth Areas is highly likely to arise before 2023, provided infrastructure constraints can be overcome. This reduces the danger of a shortfall in five year supply after 2017.

Environmental Capacity / additional sites. The objections raised by Natural England, AONB Partnership and others highlight the environmental constraints faced by Torbay, and the difficulty in achieving a growth trajectory of 10,000 dwellings without greater certainty about the environmental impacts.

As indicated in the schedule below, discussions are ongoing with Natural England, Kestrel Wildlife Consulting Ltd and the Council's Urban Design officer and drainage engineers about the extent to which Natural England's objections could impact on the possible

development of land **South of White Rock**. However it is clear that further evidence on the likely impact on ecology and agricultural land will be required before the site south of White Rock can be allocated for development in the Local Plan. It is recommended that the greenfield land at **St Marys Campsite, Brixham** is deleted as a pooled housing site due to likely impact on greater horseshoe bats (and the South Hams SAC).

Other proposed housing sites, including **Steps Cross, Torquay** and **Churston Golf Club** appear to be developable in principle and should be retained in the pool of sites in Appendix D of the Submission Local Plan for identification by Neighbourhood Forums for inclusion in Neighbourhood Plans. It should be noted that Neighbourhood Forums are able to allocate other sites, and exclude identified sites, if those other sites are shown to be developable and deliverable.

Note that discussions are ongoing with regard to Natural England's comments on the SA/HRA, which are linked to overall growth levels.

What happens next?

The representations on the Proposed Main Modifications, along with the Council's response to them, will be considered by the Inspector conducting the Examination of the Local Plan, who will take them into account in the preparation of his final report on the soundness of the Local Plan.

Summary of recommended Revised Main Modifications		
See schedule below for more detailed discussion of representations.		
Additional Modification Number	Local Plan Policy/Para.	Further Main Modification
MM1	SS1	See discussion above. The Council believes that the most appropriate growth rate is likely to be 9,340 dwellings over the Plan Period.
MM2	4.1.25	Subject to discussion above, no major change to MM2. Amend the last line of paragraph 4.1.25 (MM2) to 31 March 2016
MM3	SS2: South of White Rock	See discussion above. Whilst the site is likely to have scope to deliver a significant number of homes, the Council believes the most expedient way forward is to exclude the allocation of land south of White Rock from the Plan.
MM3	SS2: Brixham Road/ Yalberton	Make no change through Main Modifications
MM3	SS2.2 Collaton St Mary	Make no change to Modification (see MM10 below)
MM4	Table 4.3	See discussion above. Amend Table 4.3 to be consistent with MM1.
MM5	SS11	See discussion above. Amend housing numbers to be consistent with MM1.
MM6	4.5.36	See discussion above. Amend housing numbers to be consistent with MM1.
MM7	SS12	See discussion above. Amend housing numbers to be consistent with MM1.
MM8	4.5.40	See discussion to MM1 and MM2 above. Amend last additional paragraph of 4.5.40 to delete October 2015 and refer to <u>31st March 2016</u> (see above).

MM9	SDT1 General issues	No change to MM9 (Policy SDT1). The Council would not object to revising AM58 to refer to water run off, This is not essential to the Plan's soundness.
MM9	SDT1 Sladnor Park, Maidencombe	Make no change to Modification
MM9	Chilcote Close, St Marychurch	Make no change to Modification
MM9	Steps Cross Watcombe	Make no change to Modification
MM9	Redstones, Cockington	Make no change to Modification
MM10	SDP1 General issues	Refer to wave action at 5.2.1.3 as a further Additional Modification.
MM11	SDP3 Collaton St Mary	Make no further change in relation to modified numbers at Collaton St Mary
MM12	SDB1: Land south of White Rock	See discussion above. Whilst the site is likely to have scope to deliver a significant number of homes, the Council believes the most expedient way forward is to exclude the allocation of land south of White Rock from the Plan.
MM12	SDB: Churston Golf Club	Make no change to Modification
MM12	SDB1: St Marys Campsite	Delete St Marys Campsite from pool of sites at Appendix D of the Local Plan.
MM12	SDB1: Parking in Brixham	Make no change to Modification.
MM13	TC3	Make no change to Modification.

MM14	Appendix D Pool of sites.	Delete St Marys Campsite from the Pool of sites.
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Representations to Proposed Main Modifications to the Proposed Submission Local Plan.				
Mod. ref	Local Plan Policy / para	Person/Organisation	Summary of Representations	Torbay Council Response
MM1	Policy SS1	<p>Stoke Gabriel Parish Council (418700)</p> <p>Natural England (400188)</p> <p>Paignton Neighbourhood Forum (704914)</p> <p>Brixham Peninsula Neighbourhood Forum (828890)</p> <p>Devon Campaign for the Protection of Rural England (843591)</p> <p>Collaton Defence League/ Collaton St Mary Residents Association (844172)</p> <p>South West Housing HARP (Association/Registered Providers) Planning Consortium (847469)</p> <p>Home Builders Federation (844154)</p> <p>Waddeton Park Ltd (844351/844349)</p> <p>Taylor Wimpey (844316/844315)</p> <p>Bloor Homes (844198/ 791437)</p>	<p>Issues of whether the revised growth level (10,000 dwellings and 6,000 jobs) is appropriate in relation to objectively assessed need (FOAN) and environmental/ infrastructure capacity. Paignton Neighbourhood Forum have produced an updated assessment based on the 2012 based Household projections, and assessment of capacity. This argued that FOAN is 8,300 dwellings or less. This is endorsed (along with the implied knock-on objection to other Modifications) by a number of other organizations (CPRE, Brixham Neighbourhood Forum) and individuals.</p> <p>Natural England objected that there could be in-combination effects of the additional sites on greater horseshoe bats, the Marine cSAC through combined sewer overflows, as well as harm to soil quality. Safeguards offered in Policy SS8, NC1, etc should be treated as Main Modifications.</p> <p>The Neighbourhood Forums also objected to modifications that allowed for site allocations to be made by the LPA</p>	<p>Overview</p> <p>In the Council's view, the most important factor in securing sustainable development is to secure an adopted Local Plan as quickly as possible.</p> <p>It regards the issue of environmental constraints (with specific reference to land south of White Rock) to be a more significant issue than the identification of an exact full objectively assessed need (FOAN) figure per se.</p> <p>Growth levels / Full Objectively Assessed Needs</p> <p>The issue of growth was discussed at the Local Plan Examination. The Council acknowledges that the 2012 based Household Projections are lower than the 2009 based ones (417 dwellings a year) and that they are not purely trend based but assume a recovery in inwards migration towards the 20 year average, which implies a degree of economic recovery. However, economic recovery may generate demand for additional</p>

		<p>Abacus (Support) (844863/844862)</p> <p>Dr Helen Boyles (429431)</p> <p>Mrs Leaf Lovejoy (829682)</p> <p>Ian Watson (support) (900093)</p> <p>Mr B Harland (366378)</p>	<p>rather than the forums, should Neighbourhood Plans not meet fixed deadlines.</p> <p>House builders have largely supported the increase in numbers (to 10,000) but argued that it does not go far enough. FOAN is argued to be 12,300 dwellings (or higher) in line with the PBA Housing Requirements Report and economic forecasting.</p> <p>The SW Registered Providers Association have objected that 10,000 dwellings overall will not provide sufficient affordable housing.</p>	<p>dwellings after year 10 of the Plan period (i.e. not before 2023).</p> <p>Whilst additional information (specifically household projections and economic forecasts) are relevant, the Council's view is that they do not fundamentally change the overall findings of the Housing Requirements Report (PBA 2013).</p> <p>Environmental Capacity</p> <p>Natural England's objections are noted. Growth of Torbay will continue to push at the limits of environmental capacity. The Council and its partners will continue to develop an understanding of that capacity, but on the basis of current evidence and Natural England's objections, it can be concluded that growth beyond 9430 dwellings raises significant environmental issues.</p> <p>Work is ongoing to seek to assess how far likely significant impacts on bat flightpaths can be mitigated.</p> <p>Similarly, discussion is underway to see whether impacts on the Marine SAC, from potential combined sewer overflow events (see below) can be avoided.</p> <p>However the Council's view of the evidence is that Torbay's development capacity is likely to be marginally less than 10,000 dwellings. The only available strategically significant site is likely to be</p>
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				<p>land south of White Rock (see MM3 below).</p> <p>If land south of White Rock is allocated, as currently proposed, the achievable growth level would be about 9,900 dwellings. With a smaller amount of land at White Rock identified (i.e. around 330 new homes), the achievable growth level would be around 9,760 new homes. Without White Rock, it would be about 9,430.</p> <p>See below for site specific comments.</p> <p>Whether environmental safeguards should be treated as Main Modifications</p> <p>The Council made significant modifications to the Submission Version of the Local Plan to seek to overcome Natural England's initial concerns (specifically to Policies SS8, NC1, ER2 and W5). The Inspector's Further Findings (paragraph 6) indicated that Main Modifications should only relate to matters which go to the heart of the Plan, and that many of these changes could be considered as additional modifications. The Council has sought to follow this advice.</p> <p>Affordable housing</p> <p>The Council accepts the need for affordable housing. Some of those parties expressing concern about the level of affordable housing provision have</p>
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				<p>accepted the Council's approach to viability assessment of development proposals. This approach to viability assessment often reduces the level of affordable housing provision.</p> <p>However, notwithstanding the viability issue, the overall level of growth is limited by Torbay's environmental capacity as noted above. This makes it impractical to increase housing numbers, in order to achieve greater level of affordable housing provision</p> <p>Conclusion: See discussion above. The Council believes that the most appropriate growth rate is likely to be 9,340 dwellings over the Plan Period.</p>
MM2	4.1.25	<p>Stoke Gabriel Parish Council (418700)</p> <p>Collaton Defence League/ Collaton St Mary Residents Association (844172)</p> <p>Paignton Neighborhood Forum (704914)</p> <p>Torquay Neighbourhood Forum (817474)</p> <p>Bloor Homes (844198/ 791437)</p>	<p>Objections to the housing trajectory in the light of comments on MM1.</p> <p>Objections that the trajectory is housing led and not jobs led. Objections to the additional wording indicating that the Council will prepare site allocation documents if Neighbourhood Plans have not been submitted by October 2016.</p> <p>Torquay Neighbourhood Forum suggest that June 2016 is a more reasonable timescale.</p> <p>Bloor Homes object that the housing trajectory does not include a provision to make up a backlog of under provision</p>	<p>Jobs led approach</p> <p>The issue of a jobs first approach has been covered in previous documents. The Council considers that the Local Plan does promote economic growth. The Plan undertakes to consider economic signals as part of the Local Plan monitoring.</p> <p>However, limiting house building until jobs are created, as part of five year supply monitoring, is likely to be onerous and inconsistent with the NPPF.</p> <p>Role of Neighbourhood Plans in allocating sites and how soon the Council should introduce Site Allocation DPDs.</p>

				<p>The Inspectors' Initial Findings (para 8) and Further Findings (para 7) indicate that a trigger point should be set out for commencement of site allocation plans, to avoid a potential policy vacuum in 2017. The Modifications have sought to address this issue (see also MM7 and MM8 below).</p> <p>Deadline for Neighbourhood Plan Submission</p> <p>Torquay Neighbourhood Forum's suggestion that the deadline for Neighbourhood Plan submission to the Council be extended to June 2016, to allow time for preparation, is a constructive one. There is a good and agreed evidence base, reasonable progress on Neighbourhood Plan preparation and a clear pool of identified sites. On this basis the Council believes that Site Allocation DPDs could be brought forward more speedily than if starting from scratch.</p> <p>The five year housing land supply position is monitored on an annual basis and it appears that some development in Future Growth Areas will come forward before 2023, provided that infrastructure issues are addressed.</p> <p>On this basis it is considered that the deadline for submission of Neighbourhood Plans may be extended to 31st March</p>
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				<p>2016 without risking a policy vacuum in 2017 or undermining the Council's 5 year housing land supply position.</p> <p>Conclusion: Subject to discussion above, no major change to MM2.</p> <p>Amend the last line of paragraph 4.1.25 (MM2) to 31 March 2016. Also amend 4.5.40 (MM8)</p>
MM3	SS2	<p>Land South of White Rock (SS2.4)</p> <p>South Devon AONB Partnership (438366)</p> <p>Torbay Coast and Countryside Trust (843212)</p> <p>Natural England (400188)</p> <p>Dittisham Parish Council (general observation) (900125)</p> <p>Stoke Gabriel Parish Council (418700)</p> <p>Stoke Gabriel Parish Plan Group (830233)</p> <p>Kingswear Parish Council (468630)</p> <p>South Hams District Council (438382)</p> <p>Paignton Neighbourhood Forum (704914)</p>	<p>Land South of White Rock (SS2.4)</p> <p>Objections to designating land south of White Rock as a Future Growth Area. Impact on AONB, landscape, ecology, tourism, transport, local facilities reasons. The 1997 Secretary of State's decision rejected the development of the site for employment purposes.</p> <p>Bloor Homes and South Hams District Council argue that higher numbers should be provided at Collaton St Mary, as this area has fewer constraints.</p> <p>Abacus (Stride Treglown) support allocation and have submitted a detailed land promotion report. This suggests that 328 dwellings and 3-3,500 sq m of employment/retail can be achieved on the portion of the Future Growth Area under their control.</p>	<p>How far are objections to White Rock are justified?</p> <p>See discussion in the introductory text to this schedule and map at Appendix 1.</p> <p>Land south of White Rock is likely to be the only strategically significant site with capacity to significantly increase the level of housing above the 9,240 identified in the Submission Local Plan.</p> <p>The previous Secretary of State's decision (from 1997) is noted. In addition, paragraphs 115-116 of the NPPF Indicate that great weight should be given to conserving landscape and scenic beauty in AONBs.</p> <p>Abacus have provided a Land Promotion Study setting out landscape and biodiversity evidence in support of development on this site. It is noted that that the site they have commented on at the Proposed Modifications stage is smaller than the site they previously</p>

		<p>Brixham Neighbourhood Forum (828890)</p> <p>Devon CPRE(843591)</p> <p>Bloor Homes (844198/ 791437)</p> <p>Abacus (support)(844863/844862)</p> <p>91 letters of objection from private individuals.(See schedule of objections by person).</p>		<p>promoted (corresponding to SHLAA site T756b, but excluding T739 to the south (north of Galmpton). This area is sets out around 328 dwellings (as opposed to 460 in MM3)</p> <p>The Land Promotion Study contains a detailed landscape assessment (by Stride Treglown) and bat survey (Ecosulis). However the Council's HRA advice on greater horseshoe bats (from M J Oxford/ Kestrel Wildlife) is that further assessment beyond the Ecosulis Bat Activity Survey is needed to establish whether there is a likely significant effect on the SAC.</p> <p>No evidence has been put forward on the loss of agricultural land/ soil quality, which is also part of Natural England's objection.</p> <p>In the Council's view, the promoted northern area's potential would need to be tested further before the site could be allocated. It may be suitable for longer term allocations when additional assessments have been carried out. However objectors to the allocation have raised legitimate matters that would override the presumption in favour of sustainable development.</p> <p>No evidence has been put forward about the southern part of the site (10 hectares corresponding to SHLAA site T739). Some of the representations raised concerns about the coalescence of</p>
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				<p>Galmpton with development on the Brixham Road. Deleting the southern site from the Future Growth Area would mitigate this impact.</p> <p>Conclusion</p> <p>See discussion above and introductory section. Notwithstanding the possibilities of the site and its scope to deliver a significant number of homes, the Council believes the most expedient way forward is to exclude the allocation of land south of White Rock from the Plan.</p>
MM3	SS2	<p>Brixham Road / Yalberton</p> <p>Waddeton Park Limited (overall support, but wish to extend the area further) (844351/844349).</p>	<p>Brixham Road / Yalberton</p> <p>Waddeton Park Limited support the overall policy but wish to extend the Future Growth Area at Yalberton.</p>	<p>Extension of Future Growth Area at Yalberton</p> <p>Waddeton Park Ltd's objection does not relate to a Modification but calls for an extension to the boundary of the Future Growth Area. The site is currently the subject of a planning application (P/2014/0983)). The Council do not object in principle to the extension of the Future Growth Area, with the important caveat that any proposal will need to make provision for biodiversity mitigation and landscaping. On this basis, development is unlikely to be acceptable on the entire Future Growth Area. This principle is already set out in Policy SS2 of the Local Plan.</p> <p>Conclusion: Make no change through Main Modifications</p>

MM3	SS2.2	Collaton St Mary	See discussion under MM11/SDP3 below.	Conclusion: Make no change through Main Modifications
MM4	Table 4.3	Stoke Gabriel Parish Council (418700) Paignton Neighbourhood Forum (et al) (704914)	Objection to increase in housing numbers in the context of MM1 (Policy SS1) above.	The issues around housing numbers are addressed in MM1 etc. Conclusion: See discussion above. Amend Table 4.3 to be consistent with MM1.
MM5	SS11	Stoke Gabriel Parish Council (418700) Collaton Defence League/ Collaton St Mary Residents Association (844172) Paignton Neighbourhood Forum (et al) (704914) Waddeton Park Ltd (844351/844349) Taylor Wimpey (844316/844315) Bloor Homes (844198/ 791437)	Objections to the Local Plan's housing trajectory, largely in the context of MM1 above.	The issues around housing numbers, and five year supply etc are addressed in MM1 and MM2 Conclusion: See discussion above. No change to MM5 other than to make housing numbers consistent with MM1.
MM6	4.5.36	Paignton Neighbourhood Forum (et al) (704914) Brixham Peninsula Neighbourhood Forum (828890) Stoke Gabriel Parish Council (418700) Collaton Defence League/ Collaton St Mary Residents Association (844172) Bloor Homes (844198/ 791437)	Objections to the Local Plan's housing figure, largely in the context of MM1 above.	The issues around housing numbers, and five year supply etc are addressed in MM1 and MM2 Conclusion: See discussion above. See discussion above. Amend housing numbers to be consistent with MM1..

		Taylor Wimpey (844316/844315)																		
MM7	SS12	<p>Paignton Neighbourhood Forum (et al) (704914)</p> <p>Collaton Defence League/ Collaton St Mary Residents Association (844172)</p> <p>Torbay Neighbourhood Forum (817474)</p> <p>Brixham Neighbourhood Forum (828890)</p> <p>Stoke Gabriel Parish Council (418700)</p> <p>South West Housing HARP (Association/Registered Providers) Planning Consortium (847469)</p> <p>Waddeton Park Ltd (844351/844349)</p> <p>Bloor Homes (844198/ 791437)</p> <p>Taylor Wimpey (844316/ 844315)</p>	<p>Objections to the Local Plan's housing trajectory, largely in the context of MM1 above. Neighbourhood Forums and others object to indication that site allocation documents will be prepared by the Council should Neighbourhood Plans not come forward.</p> <p>Paignton Neighbourhood Forum (and supporters) object to lack of a clear jobs-led approach.</p> <p>Developers object to reliance on windfall sites and car parks that are less deliverable / certain than greenfield allocations. Object that no allowance is made for backlog of unmet need.</p>	<p>The issues around housing numbers, jobs led approach and five year supply etc are addressed in MM1 and MM2</p> <p>Backlog of undersupply</p> <p>Torbay has no record off persistent under delivery and therefore a 5% NPPF buffer would apply. The starting point for monitoring the Local Plan housing requirement is April 2012 (see NPPG 3-036).</p> <p>Housing completions for the two elapsed years of the Plan period are as follows: 2012/13=256 2013/14=446 i.e. 351 average</p> <table border="1"> <thead> <tr> <th colspan="4">Shortfall to be made up over 5 Years</th> </tr> <tr> <th></th> <th>Requirement</th> <th>Shortfall since 2012</th> <th>Over 5 years</th> </tr> </thead> <tbody> <tr> <td>HH projections</td> <td>417pa</td> <td>66</td> <td>13</td> </tr> <tr> <td>SS12 modified</td> <td>450</td> <td>99</td> <td>20</td> </tr> </tbody> </table>	Shortfall to be made up over 5 Years					Requirement	Shortfall since 2012	Over 5 years	HH projections	417pa	66	13	SS12 modified	450	99	20
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HH projections	417pa	66	13																	
SS12 modified	450	99	20																	

				<p>On this basis the shortfall is between 13-20 dwellings per year. This does not undermine the five year supply position.</p> <p>At April 2015 there were 2,633 dwellings with planning permission (excluding sites with pending approvals such as Wall Park, Brixham), which would sustain a 5 year supply of up to 526 dwellings a year. As noted elsewhere in this Schedule there is active developer interest in other Future Growth Areas, which will boost the five year supply position.</p> <p>This reduces the urgency of relying on car parks etc to make up five year supply post 2017. However, the sites identified in the pool in Appendix D of the Local Plan are within the built up area and the Council consider that they can contribute to sustainable development, through Neighbourhood Plans.</p> <p>Conclusions: See discussion above. Amend housing numbers to be consistent with MM1.</p>
MM8	4.5.40	<p>Paignton Neighbourhood Forum (et al) (704914)</p> <p>Torbay Neighbourhood Forum (817474)</p> <p>Brixham Peninsula Neighbourhood Forum (828890)</p>	<p>Objections to housing trajectory as above. Neighbourhood Forums object to text indicating that site allocations plans will be prepared by the Council if Neighbourhood Plans with sufficient housing land are not submitted by October 2015.</p>	<p>The issues around housing numbers, jobs led approach and five year supply etc are addressed in MM1 and MM2.</p> <p>Conclusions: See discussion in MM1 and MM2 above. Amend 4.5.40 (last additional paragraph) to refer October 2015 to 31st March 2016 (see above).</p>

		<p>Stoke Gabriel Parish Council (418700)</p> <p>Collaton Defence League/ Collaton St Mary Residents Association (844172)</p> <p>Abacus (Support)(844863/844862)</p>	<p>Torquay Neighbourhood Forum suggest that June 2016 is more a manageable timescale than October 2015.</p>	
MM9	SDT1	<p>General issues</p> <p>Natural England (400188)</p> <p>Sport England (501495)</p> <p>Torquay Neighbourhood Forum (817474)</p>	<p>General issues</p> <p>Torquay Neighbourhood Forum object to identification of additional sites. They need to be properly assessed by the Neighbourhood Forum, and the sites render the Plan potentially unsound.</p> <p>Natural England object that additional sites in Torquay, including car parks, may not be amenable to sustainable drainage. This may lead to an increase in combined sewer overflows at Hopes Nose, causing harm to the Marine cSAC.</p>	<p>Site allocation should be through Neighbourhood Plan</p> <p>The additional sites identified in MM9-11 and MM14 are part of the pool of sites from which the Neighbourhood Plans should draw sites for inclusion in Neighbourhood Plans. These are not necessarily a definitive list but are based on sites identified in the SHLAA.</p> <p>It is acknowledged that there is limited headroom to omit particular sites, but some scope does exist particularly if alternative deliverable sites are identified by the Neighbourhood Forums.</p> <p>Natural England's concerns about sewer capacity from run-off from car parks.</p> <p>As acknowledged by Natural England, Policies ER1 (AM157-AM162), ER2 (AM163-AM166) and W5 (AM167-171) have been modified to emphasise the importance of sustainable drainage and avoiding combined sewer outfalls (CSOs) affecting the Marine cSAC. In particular Policy ER2 sets out a sequential drainage</p>

				<p>hierarchy which applies to Torquay (AM163).</p> <p>AM57 of the Additional Modifications mentions protection of the natural environment in the Torquay, which includes the candidate Special Area of Conservation.</p> <p>Note that the Council's Drainage Engineers are considering Natural England's comments to assess whether further amendments are necessary to ensure that Torquay's development is deliverable without additional impact on CSOs.</p> <p>Conclusion: The Council would not object to making a further Additional Modification to the explanation to SDT1 at paragraph 5.1.1 (AM58) to indicate: "Development should avoid additional surface water run-off into combined sewers in accordance with the hierarchy set out in Policy ER2".</p> <p>However this is not considered to be necessary for the Plan's soundness.</p>
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MM9	SDT1	<p>Sladnor Park, Maidencombe</p> <ul style="list-style-type: none"> • Maidencombe Residents Association (900169) • Nigel Davies (638322) • Richmond Torquay (Jersey Limited) (844351/ 844178) 	<p>Sladnor Park, Maidencombe</p> <p>Two objections to Sladnor Park on the basis of greater horseshoe bats, remoteness and lack of facilities.</p> <p>The site is supported by the landowner (Richmond Torquay (Jersey Limited)), who object that the site has capacity for greater number of dwellings than identified in the Main Modifications.</p>	<p>Sladnor Park, Maidencombe</p> <p>The importance of greater horseshoe bat habitats is noted. Similarly the site is within a sensitive part of the undeveloped coastal landscape, and located some way from services. However the site has previously gained planning permission for a retirement village (P/2006/0747/MOA and P/2007/1410/MRM), which may have been implemented and, in any case, demonstrates that the site is developable and deliverable.</p> <p>On this basis it is highly likely that development could be achieved without harm to greater horseshoe bats or the County Wildlife Site. Sensitive development may help to enhance the site's biodiversity value. Detailed site assessment will need to be carried out as part of any subsequent planning application to establish the site's capacity, necessary biodiversity etc and mitigation measures. Without this information, the Council do not consider it would be appropriate to increase the assessed yield above 25 dwellings.</p> <p>Conclusion: make no change to Modification</p>
MM9	SDT1	<p>Chilcote Close, St Marychurch Kathy Uglow (900074)</p>	<p>Chilcote Close, St Marychurch</p> <p>1 objection to Chilcote Close on basis of loss of trees, car parking and impact on residents' right of way.</p>	<p>Chilcote Close, St Marychurch</p> <p>It is considered that the issues identified can be overcome through design and conditions protecting trees and residents' rights of way.</p>

				Conclusion: make no change to Modification
MM9	SDT1	Steps Cross, Watcombe Sport England (501495) Watcombe Wanderers Football Club (900130) Watcombe Children's Centre Nursery (900132) Petition with 75 signatures and 144 letters of objection to allocation of land at Steps Cross, Torquay (see schedule of objections by person).	Steps Cross, Watcombe This was the most objected to Modification to the Local Plan. Objections on the basis of loss of open space (both formal football pitch and informal play/dog walking area), severe traffic congestion, and impact on nearby schools. (Note that the Council is in discussion with Sport England about the proposal to use development of this site to fund the nearby King George V playing fields).	Steps Cross, Watcombe The high level of objections is noted. The proposal would result in the loss of an informal recreation area. However the playing pitch is identified in the Torbay Playing Pitch Strategy as being substandard. Discussions have taken place between Sport England and the Council's Residents' and Visitor Services. These have confirmed that the Playing Pitch Strategy would support tying in development of Steps Cross playing field with investment in the nearby King George V playing fields (East of Teignmouth Road, 250 metres from Steps Cross), to achieve an overall improvement in provision. On this basis development could meet the tests in NPPF paragraph 74. Objections have been raised on the grounds of congestion, and the busy junction with Teignmouth Road. However, it is considered that impacts could be satisfactorily ameliorated. The site is identified in Appendix D of the Local Plan as a site for allocation in Neighbourhood Plans, as noted above. Conclusion: make no change to Modification
MM9	SDT1	Other sites Anthony Garlick (845042)	Other sites	"Redstones" in Cockington is the site of an unauthorised development and is the

			Mr Garlick has promoted Redstones Nursery, Cockington as a suitable alternative site.	subject of ongoing appeals and enforcement action. There have been no Modifications that directly affect this part of Cockington. Conclusion: make no change to Modification
MM10	SDP1	Stoke Gabriel Parish Council (418700) South Hams District Council (438382) Paignton Neighbourhood Forum (704914) Collaton Defence League/ Collaton St Mary Residents Association (844172) Natural England (400188) Environment Agency (843585)	Objections to Paignton's growth level in the context of MM1 above. The Environment Agency request mention be made of the need for flood defence from wave action on Paignton town centre sites.	The issue of growth levels is addressed in the context of MM1 above. Issue of wave action can be added to 5.2.1.3 as a further Additional Modification The Policy and paragraph 5.2.1.3 refers to flooding issues, so mentioning wave action is a minor Additional Modification Conclusion Refer to the need to safeguard Paignton Town Centre sites from the effects of wave action in SDP1/ paragraph 5.2.1.3.
MM11	SDP3	Stoke Gabriel Parish Council (418700) Paignton Neighbourhood Forum (704914) Collaton Defence League/ Collaton St Mary Residents Association (844172) Natural England (400188) South Hams District Council (438382) Taylor Wimpey(844316/844315) Bloor Homes (844198/ 791437)	Objections to Paignton's growth level in the context of MM1 above. Reduction of dwellings at Collaton St Mary does not go far enough to alleviate infrastructure and environmental impact. South Hams District Council, Taylor Wimpey and Bloor Homes object that more homes could be provided at Collaton St Mary, which would reduce the pressure on land south of White Rock (MM2). Waddeton Park Limited support the overall allocation at Yalberton(SDP3.4)	Is the revised level of development (@460 dwellings) appropriate at Collaton St Mary? Collaton St Mary has been the subject of detailed Masterplanning. The Masterplan has assessed the landscape impact of development. It is noted that the strongest developer interest relates to the North of Totnes Road, which some objectors consider to be the more sensitive in landscape terms.

		Waddeton Park Limited (overall support) (844351/844349)	but wish to extend the Future Growth Area.	<p>Whilst detailed schemes may demonstrate higher numbers of dwellings are achievable without causing undue landscape or greater horseshoe bat/biodiversity impact; the Council has not received evidence to show how this could be achieved. On this basis it considers that the capacity identified in the Masterplan is the most justifiable figure, based on the available evidence.</p> <p>The Council does not consider it is appropriate to increase the housing requirement at Collaton St Mary simply because of sensitivities at land south of White Rock. Each site should be considered on its merits and the extent to which development impacts can be mitigated.</p> <p>Conclusion: Make no change to Modification</p>
MM12	SDB1	<p>Land South of White Rock</p> <p>South Devon AONB Partnership (438366)</p> <p>Torbay Coast and Countryside Trust (843212)</p> <p>Natural England (400188)</p> <p>Dittisham Parish Council (general observation)</p> <p>Stoke Gabriel Parish Council (418700)</p>	<p>Land South of White Rock</p> <p>Objections to designation of land South of White Rock as a Future Growth Area as per MM2 above.</p> <p>Brixham Neighbourhood Forum additionally object that site allocations should come through the Neighbourhood Forum.</p> <p>Abacus support the proposed designation of White Rock and have submitted a detailed land promotion</p>	<p>See response to White Rock in MM3 above.</p> <p>Conclusions</p> <p>Whilst the site is likely to have scope to deliver a significant number of homes, the Council believes the most expedient way forward is to exclude the allocation of land south of White Rock from the Plan.</p>

		<p>Stoke Gabriel Parish Plan Group (830233)</p> <p>Kingswear Parish Council (468630)</p> <p>South Hams District Council (438382)</p> <p>Paignton Neighbourhood Forum (704914)</p> <p>Brixham Peninsula Neighbourhood Forum (828890)</p> <p>Devon CPRE (843591)</p> <p>Bloor Homes (844198/ 791437)</p> <p>91 letters of objection from private individuals.</p> <p>Abacus (support) (844863/844862)</p>	<p>report indicating how the site could be developed (see above).</p>	
MM12	SDB1	<p>Churston Golf Club</p> <p>Bloor Homes (844198/ 791437)</p> <p>Brixham Peninsula Neighbourhood Forum (828890)</p>	<p>Churston Golf Club</p> <p>Objections about the developability/deliverability of the site, including from Bloor Homes (in relation to their promotion of Collaton St Mary) and Brixham Neighbourhood Forum</p>	<p>Developability of Churston Golf Club</p> <p>The Council concurs with Natural England's comments that the 1st and 18th hole site is itself relatively unconstrained, but the difficulty is in identifying a replacement clubhouse and 1st/18th hole site.</p> <p>The Council consider that this issue is not insurmountable in the medium term and it is therefore appropriate to retain the site as a site for identification by the Brixham Peninsula Neighbourhood Plan.</p>

				Conclusion: Make no change to Modification
MM12	SDB1	<p>St Marys Campsite, Brixham Natural England (400188) South Devon AONB Partnership (438366) Torbay Coast and Countryside Trust (843212)</p> <p>Cherry Hosking (support) (892197) Willian and Jenefer Hosking (support) (90064) Ian Watson (support) (90093) Lilla To (900067) Edwina Scarlett (900066)</p>	<p>St Marys Campsite, Brixham</p> <p>Objections from environmental bodies about impact on greater horseshoe bats.</p> <p>5 letters of support including from Mrs Hosking (the landowner).</p>	<p>Developability of St Mary's Campsite</p> <p>Natural England's, AONB Partnerships and the Coast and Countryside Trust's comments on St Mary's Campsite are noted. The Council's own assessment of likely impact on greater horseshoe bats (M J Oxford/Kestrel Wildlife Ltd) indicates that there is likely to be significant impact upon habitats as a result of development on this site.</p> <p>Whilst there were a number of representations in support of the site, no evidence was submitted to indicate how the impacts of development could be mitigated. Consequently it is recommended that the site is not allocated for development and deleted from Appendix D of the Local Plan (with a consequent reduction in numbers by 50 dwellings).</p> <p>N.B. The adjacent brownfield industrial site, currently allocated in the Adopted Torbay Local Plan (H1.21) would remain as a potential housing site.</p> <p>Conclusion: Delete St Marys Campsite from pool of sites at Appendix D of the Local Plan.</p>

MM12	SDB1	Other Mr and Mrs J Collinge (892157)	Other Objection to loss of parking in town	Retention of sufficient car parking in Brixham It is made clear that the development of car park sites in Appendix D of the Local Plan state that they are subject to retention of sufficient car parking. In Brixham this only relates to Shoalstone Overflow car park (although Oxen Cove and Freshwater car parks, and the Town centre are identified in SDB2 Table 5.15 and are not the subject of proposed Modifications).
MM13	TC3	Paignton Neighbourhood Forum (Support) (704914)	Reduction in retail proposal threshold test is supported by Paignton Neighbourhood Forum (and others who endorse their views).	There have been no objections (and 1 supporting comment) to this Modification. Conclusion: Make no change to Modification
MM14 Appendix D Table 1 Committed Sites				
Torquay				
Kings Ash House R733		No representations to deletion		
Churston Golf Club (Dartmouth Road)		See response above (MM12 SDB1) and below.		See above.
<u>Wall Park Brixham (165)</u>		No representations (resolution to grant planning permission on the site)		
MM14 Appendix D Table 1 Additional (Previously excluded) Sites for Pool of Housing Sites.				
Town Hall Car Park (50).		No specific representations (other than general comments above)		

Temperance Street (65).	No specific representations (other than general comments above)	
Lower Union Lane (20).	No specific representations (other than general comments above)	
Terrace Car Park (60).	No specific representations (other than general comments above)	
Sheddon Hill (50).	No specific representations (other than general comments above)	
Meadfoot Car Park (20).	No specific representations (other than general comments above)	
Brunswick Square (13).	No specific representations (other than general comments above)	
Chilcote Close (10).	Kathy Uglow- objection on right of way, access, trees and parking grounds.	See response above to MM9.
Sladnor Park (25).	Maidencombe Residents Association, Nigel Davies: Object on highways, sustainability and ecology grounds Richmond Torquay (Jersey Limited): Promote higher numbers on the site	See response above to MM9
<u>Steps Cross Playing Field, Moor Lane (70).</u>	Sport England (501495), Watcombe Wanderers Football Club (900130), Watcombe Children's Centre Nursery (900132) Petition and 144 letters of objection to allocation of land. Traffic, loss of playing field/recreation area, impact on schools.	See response above to MM9
Paignton		
Victoria Square (60).	Environment Agency- mention flood risk from wave action.	See response above to MM10
Station Lane (35).	Environment Agency- mention flood risk from wave action.	See response above to MM10
Paignton Harbour (50).	Environment Agency- mention flood risk from wave action.	See response above to MM10
Preston Gardens Car Park (20).	No specific representations (other than general comments above)	See above
Churchward Car Park (15).	No specific representations (other than general comments above)	See above

Brixham		
Churston Golf Club (132)	Brixham Peninsula Neighbourhood Forum (828890), and Bloor Homes object that the site is not developable and should be deleted.	See response above to MM12
Shoalstone Overflow Car Park (6)..	Mr and Mrs Collinge- object to loss of car parks	See response above to MM12
St Marys Campsite (50).	<p>Objections from Natural England (400188), South Devon AONB Partnership (438366) and Torbay Coast and Countryside Trust (843212) about impact on greater horseshoe bats.</p> <p>5 letters of support from: Cherry Hosking (892197), William and Jenefer Hosking (90064) Ian Watson (90093),Lilla To (900067) and Edwina Scarlett (900066)</p>	<p>See response above to MM10</p> <p>Conclusion: Recommend that St Marys Campsite be deleted from Pool of sites.</p>

Amended Table 4.3 Source and timing of new homes (rounded to nearest 5 dwellings) necessary to achieve 10,000 dwelling trajectory. (Note table becomes part of Policy SS11)-See MM4 and MM5.

	Approx. Numbers in Submission Plan	Approx numbers in Modifications	Notes on change (Modification) from Submission Draft
Torquay (SDT1)			
SDT2 Torquay Town Centre & Harbour	670	<u>950</u>	+50 Town Hall car park (food retail led development site with potential for housing as part of a mixed-use development) +65 Temperance Street, +20 Lwr Union Lane, +60 Terrace car park +50 Sheddon Hill, +20 Meadfoot car park, +13 Brunswick Square (+278 total)
SDT3 Torquay Gateway	745	745	
SDT4 Babbacombe and St Marychurch	255	<u>335</u>	+10 Chilcote Close, +70 Steps Cross Lane/Moor Lane
Elsewhere in SDT1 (excluding SDT2, 3 & 4)	1025	<u>1050</u>	+25 Sladnor Park
Small windfalls <6 dwellings)	1170	1170	
Torquay sub total	3865	<u>4250</u>	
Paignton (SDP1)			
SDP2 Paignton Town Centre and Seafront	460	<u>640</u>	+60 Victoria Square, +35 Station Lane, +50 Paignton Harbour, +20 Preston Gardens car park, +15 Churchward car park
SDP3 Paignton North and Western Area	2625	<u>2235</u>	- 376 at Collaton St Mary, as per draft Masterplan. -14 Kings Ash House
SDP4 Clennon Valley	N/A		
Elsewhere in SDP1 (excluding SDP2, 3 & 4)	600	600	
Small windfalls <6 dwellings)	900	900	
Paignton sub total	4585	<u>4375</u>	
Brixham Peninsula (SDB1)			
SDB2 Brixham Town Centre and Waterfront	65	<u>70</u>	+6 Shoalstone overflow car park

SDB3.1 & SDB3.2 Brixham Urban Fringe and AONB	245	310 260	+50 St Marys Campsite (Churston Golf Club pushed back to years 6-10 of the Plan period. Wall Park +15 (15 more than 150 in Local Plan, becomes a committed site rather than a FGA)
SDB 1 (New Proposal) South of White Rock (Relates to SDP3, but within Brixham Peninsula NP area.	0	460 0 or 328 dwellings	South of White Rock. New Future Growth Area in Proposed Modifications
Elsewhere within SDB1 (excluding SDB2, 3.1 & 3.2)	220	220	
Small windfalls <6 dwellings)	260	260	Sites of 5 or fewer dwellings - too small to show on Policies Map. Delivery throughout Plan period.
Peninsula sub total	790	1320 810 (without south of White Rock) 1138 (including land south of White Rock)	
Total	9240	9,945 9435 without Land south of White Rock 9,763 including land south of White Rock	

