

Torbay Local Plan

Housing Update: Growth Options Consultation

Regulation 18.

January 2022

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Torbay Local Plan Housing Update: Growth Options Consultation. January 2022.

Background

The Local Plan is an important document because when it is adopted it forms the legal starting point for determining planning applications, and sets out where new homes, employment, community facilities etc. should be built. The Local Plan also sets a strategic framework for Neighbourhood Plans, which also have legal weight for determining planning applications.

The Torbay Local Plan was adopted in December 2015 and must be reviewed every five years. The Local Plan was reviewed in November 2020, and Cabinet resolved to carry out a limited update of the Local Plan to review its housing policies¹.

In 2021², an assessment of possible housing sites was carried out by the council in liaison with other stakeholders. This consultation is the next stage of the process and considers the growth options that the updated Local Plan could adopt. Following consideration of responses received to this consultation, the council will develop a “preferred option” with a Draft Local Plan update that will be made available for comment in a further consultation which will take place later in 2022^(OBJ).

Government policy on planning is set out in the National Planning Policy Framework (NPPF) and online Planning Practice Guidance (PPG). These set a formula to calculate the minimum number of homes that are needed in an area. This figure is referred to as the “Standard Method” local housing need. This currently stands at 559 dwellings a year, but is expected to rise in 2022 due to house price inflation. The Local Plan will be tested by a planning inspector on whether it provides a strategy which as a minimum seeks to meet the area’s objectively assessed needs³.

The Standard Method figure is higher than the existing Local Plan’s figure and therefore additional housing sites will need to be allocated in order to make the land available to meet the government’s housing requirement.

Plan Period

The Council's intends to keep the existing Plan period of 2012-30. We are aware of the requirement in the NPPF that strategic policies should look ahead over a minimum 15-year period from adoption⁴. However, as

1 These are Policies SS1, SS2, SS12, SS13 and the Strategic Development” policies relating to neighbourhood areas. A new Strategic Development Policy for the Broadsands, Galampton and Churston Villages Neighbourhood Forum will be prepared. [Decision - Torbay Local Plan 2012-30: Five Year Review.](#)

2 Housing and Economic Land Availability Assessment (HELAA). The HELAA does not allocate sites. It merely provides an assessment of suitability, availability, and achievability of land for development. The HELAA is not council policy and carries no weight in determining planning applications.

3 See paragraphs 11, 35 and Chapter 5 of the National Planning Policy Framework (NPPF) [National Planning Policy Framework - Guidance - GOV.UK \(www.gov.uk\)](#)

4 NPPF paragraph 22

the Plan was adopted in 2015, it may be argued that this is met, and that as an update to the Plan numbers this is not a new strategic policy or plan.

An alternative approach would be to roll forward the Plan period to 2040, so that the Updated policies have 15 years from adoption. It is noted that this is the approach of neighbouring authorities. That may however have a further impact on other policies.

The likely dwelling numbers achievable are expressed as dwellings per year; although the lower growth options tend to trail off post 2030 as sites run out.

We would be interested in views of the practicality and soundness⁵ of maintaining a 2030 terminal date for the Local Plan.

Housing and Economic Land Availability Assessment (HELAA)

The Housing and Economic Land Availability Assessment (HELAA) is a key part of the Local Plan evidence. It has been prepared by council officers to consider the suitability, availability, and achievability of land for development in Torbay. The HELAA does not represent a formal Council view of sites. Rather it is an evidence base document to help us consider possible development options.

Past studies have been carried out by consultants (most recently in 2013) and represent one-off reports to the Council. The current HELAA is intended to be an evolving document that can reflect further information or sites that come to light.

The HELAA has sought to consider a wide range of sites. The HELAA has adopted applied a traffic light approach to sites: Green are sites that are allocated in the existing Local or Neighbourhood Plans, Yellow are sites that are considered to have relatively minor constraints; and amber are sites that are assessed to have significant constraints. Sites that officers have assessed to be unsuitable for development have been coded red. A few areas remain uncoloured on the map, as it is not considered by officers that these are likely to represent potential sites or broad locations. Some of these are designated as Local Green Spaces in the Neighbourhood Plans, or have similar high-level constraints. We have also sought to assess the likely number of homes that could be achieved from windfall sites (see below), the reuse of car parks and holiday accommodation., and shrinking the town centres to allow more housing.

The HELAA is available online at [Torbay Housing and Economic Land Availability Assessment - Torbay Council](#)

Growth Options

Several potential growth options based on the HELAA have been developed. These are set out in more detail below. Again, it is stressed that no Council decision on these options has been made: they are published for consultation prior to any decision being made.

Whilst the growth options are based on the HELAA's findings, there have been some variations and therefore the options maps are presented as two colours (rather than traffic lighted) for simplicity. The main difference between the HELAA and the options is that some urban regeneration sites face significant constraints, but are nevertheless likely to be promoted under all growth options.

5 As tested by paragraph 35 of the NPPF

What growth options are we consulting on?

The broad options that we are seeking views on are:

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

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

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

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

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

The chosen Local Plan housing growth scenario will affect poverty, inequalities, and the provision of affordable housing. Broadly speaking, a high growth scenario which seeks to meet housing need will provide the most affordable housing⁶ and economic prosperity; but will come at the cost of its environmental impact. Torbay has internationally important biodiversity associated with the South Hams Special Area of Conservation (SAC) at Berry Head, and the Marine SAC. The options will need to be assessed through a Habitats Regulations Appropriate Assessment (HRA), which will need to consider the in-combination effects of growth.

Is there another way?

Local Plan housing targets are usually expressed as a minimum figure. Where the target is not achieved, for whatever reason, government policy makes it easier for planning permission to be gained on other sites: even if these are not wanted by the local community. Whilst government policy promotes making the best use of land, there is no clear "sequential test" to ensure that brownfield sites are delivered first⁷.

6 Brownfield sites tend to be less viable than greenfield sites. In addition, they tend to provide apartments rather than family houses. Since 2012, 63% of Torbay's affordable housing has been on brownfield land. However, 81% of affordable housing provided through the planning system through S106 Agreements was on greenfield land. About a third of affordable homes were provided directly by Registered Providers, often through redeveloping existing affordable housing areas: these provided a greater proportion of brownfield development.

7 A "sequential test" to prioritise the delivery of brownfield sites existed in the 2000 PPG3 "Housing" until superseded by PPS3 in 2006. PPS3 increased emphasis on delivery and introduced the requirement for local

The current Local Plan seeks to regenerate urban areas, and these will remain promoted in all of the growth scenarios. We would be interested to hear whether there is a way in which the brownfield/urban regeneration aspirations can be expressed more ambitiously (with a higher housing target for these sites), without placing the area's remaining greenfield land at risk of development. This would allow a more ambitious aspiration, but a lower fixed figure which would be a minimum used for assessing five-year supply and housing delivery test figures. So long as the minimum figure is met, brownfield regeneration could continue to be promoted, without jeopardising unallocated greenfield sites.

We recognise that this is a different approach from the conventional practice of stating a single figure and would welcome views on its achievability and practicality.

Known Unknowns: Windfall sites

A significant proportion of Torbay's housing arises from windfall sites, that is sites that are not identified for development. The HELAA has not counted sites considered likely to provide less than six net new dwellings. Similarly, it is recognised that larger sites may also arise as unexpected windfalls. This includes sites that are currently in use, but may become available during the remaining plan period.

Based on the number of past housing completions on small sites since 2012 (i.e., the current Local Plan period), and the numbers of smaller sites considered in the HELAA, the council assess that around 100 dwellings a year can be assumed to arise from completions and are added to the approximate housing numbers in each scenario⁸.

What about brownfield sites and empty homes?

All of the options will continue to promote urban regeneration and the redevelopment of brownfield land. It may be possible to boost numbers in the built-up area if the Local Plan adopts a clear policy supporting tall buildings, the redevelopment of town centres or holiday accommodation. However, such schemes may take several years to deliver, which we recognise is an added reason for supporting a longer Plan period. Such an option is likely to impact on heritage assets such as conservation areas and listed buildings. On this basis, some of the town centre sites are coded yellow or orange in the HELAA because they are often complex to deliver; however, they appear in every option as the Council fully intends to regenerate its urban areas. Therefore, the Local Plan Growth Options shows all of the town centre sites in purple.

Whilst Torbay has above average numbers of long term (6 months or longer) empty homes, the majority of them are lower value apartments (both in terms of numbers and length of vacancy). Bringing vacant

planning authorities to show a five-year supply. The limitations of brownfield sites (less affordable housing, flats rather than houses, and the need to provide homes) are acknowledged in this paper.

⁸ Note that where smaller sites (yielding fewer than 6 dwellings) are allocated in Neighbourhood Plans, the windfall allowance will need to be reduced to avoid double counting. Another way to count windfalls would be to add up the number of planning permissions for smaller sites. However, a non-completion factor would need to be added to these to recognise that a percentage of these sites will not be developed.

The delivery of windfall sites will be monitored throughout the Plan period, but it is recommended that a cautious estimate is made of windfall potential at a plan making stage.

dwellings back into use will be valuable to regenerate urban areas, but is unlikely to significantly boost numbers.

Further discussion of the issues facing Torbay in trying to boost housing numbers, and measures underway on key sites, including urban regeneration sites are set out in the Housing Delivery Test Action Plan, available at: [Evidence Base and Monitoring - Torbay Council](#).

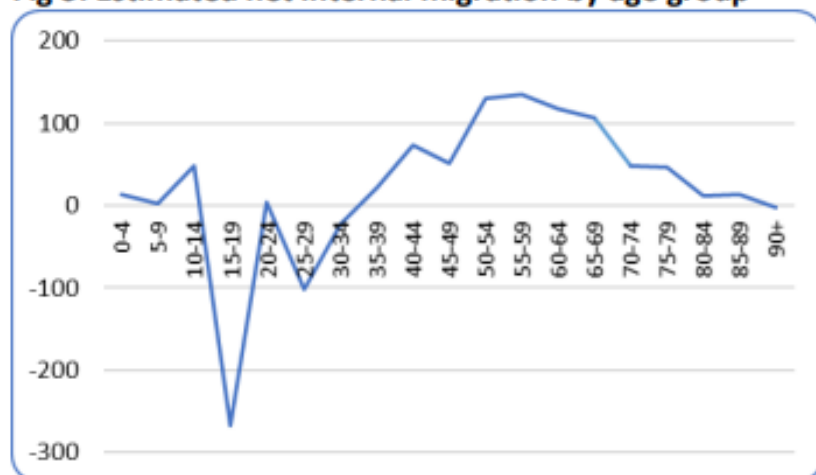
Can you deliver?

The Local Plan’s performance will be tested on how many homes are built, through the government’s Housing Delivery Test. So, any option must have a realistic prospect of being built as failing to deliver could compromise the Council and result in the approval of developments that are not planned for. There is no point in proposing an option that won’t get built. This applies to high growth options where there is no willing landowner; but also to options that just seek to build town centre apartments for which there is limited demand and take time to deliver, for example due to complex land ownerships.

Can we assume people won’t move to Torbay?

Population growth in Torbay is entirely driven by domestic inwards migration. Between 2011 and 2021 there were 4,239 more deaths than births in Torbay⁹. Torbay traditionally sees young people leave and older people arrive. Migration is an element of housing need, and we can’t ignore it, or seek to just build homes for local people. Nevertheless, the different growth options have implications for population growth and the likely age structure of Torbay, as well as the availability to meet the needs of the local community. The option chosen will also affect the affordability of homes for people moving into the area as well as those already resident. These matters are discussed in the descriptions of the Options below.

Fig 3: Estimated net internal migration by age group



Source: Office for National Statistics internal migration estimates, 2020. Estimates may have been affected by the pandemic as movement may not have been accompanied by timely updates to the administrative data used to produce the estimates

⁹ Between 2012-21 there were 13,543 births and 17,782 deaths. There were 103 more deaths in 2020/21 than the average of the 9 preceding years. But there is a long-term trend of deaths outnumbering births and population growth being driven by net inwards migration (Source NHS Digital, ONS).

Where will people work?

The Local Plan Update is focussing on housing options and as such there are no new employment areas noted in this consultation. However, under Policy SS4 and SS5 of the current Local Plan, the Council seeks to deliver at least 65,000 sq. m of employment land. A proportion of major housing development sites should provide employment space as part of mixed-use development. It is intended to continue and strengthen this requirement in the updated Plan.

The growth options have implications for the amount of employment land that can be provided. Options 1 and 2 would provide the least option for employment land, and may increase pressure to convert or redevelop existing employment land. Conversely Options 4 and 5 present more opportunity to deliver the mixed-use sites to support employment, although the shortage of level sites may hamper the viability of such land for employment uses.

What about the Infrastructure?

We would welcome your views on Infrastructure needs. In particular, whether there are any particular gaps that would allow more growth if they could be filled. We will need to take into account physical infrastructure (e.g., roads, flood defences, water and utilities etc.) as well as social infrastructure (e.g., healthcare facilities, police capacity, affordable housing) and environmental infrastructure (e.g., green corridors, open space etc).

As well as drawing on infrastructure (such as highway capacity, doctors' surgeries etc.) development can also help generate investment and keep facilities such as schools and shops viable.

Direct impacts arising from development would be expected to be overcome within the proposal. However, there will be some wider pressures on infrastructure, and it is these that we are particularly seeking views on.

Other Assessments

This consultation is part of a range of evidence and studies that will inform the update to the Local Plan. In particular, the Plan is subject to a Sustainability Appraisal, and Habitats Regulations Appropriate Assessment. A Sustainability Appraisal (SA) of the Options has been prepared and is available to view alongside this document. The findings of the SA have informed the pros and cons of each option suggested in this document.

We will also need to review the evidence documents that informed the Local Plan adopted in 2015. This includes (but is not limited to) the Housing and Economic Needs Assessment (HENA), Highways capacity, Strategic Flood Risk Assessment (SFRA), Retail and Town Centres Study, assessment of impacts upon the Special Areas of Conservation and other biodiversity, and landscape advice. We will also need to update our evidence on development viability.

What density Assumptions have you made?

In calculating the likely numbers of dwellings that could be achieved on sites, officers have tried to assess sites' capacity considering their location, sensitivity etc. We have taken a starting point of between 20-40 dwellings per hectare gross depending on the sites' sensitivities. Sites that could be delivered at "urban" densities are likely to be at the higher end of the scale, whereas sensitive rural sites are likely to be at the lower end. It is likely that higher densities can be achieved in the town centres, subject to deliverability considerations.

Where sites have been put forward by potential developers, we have taken the numbers cited by their promoters into account. However, these numbers are necessarily high-level assessments. If sites are proposed for allocation, a more detailed assessment of their capacity will need to be carried out.

We are considering, and welcome views, on how we can push for appropriate higher density development in all areas.

How to View this Consultation.

This consultation may be read on screen or printed out. It contains maps of proposed options. These are also available online, where the maps can be zoomed to see sites at a larger scale, to get a better view of the sites indicated in each option. The site reference numbers on the maps relate to the Housing and Economic Land Availability Assessment (HELAA). The HELAA is not council policy, but an officer level assessment of the suitability, availability, and achievability of housing land. For more information see [Torbay Housing and Economic Land Availability Assessment - Torbay Council](#)

The Options in More Detail

Option 1: No Further Greenfield Allocations beyond already allocated or approved sites.

This option would limit new greenfield sites to those where the principle of development has already been agreed either through being allocated in the Local or Neighbourhood Plan; or enjoying a current planning permission.

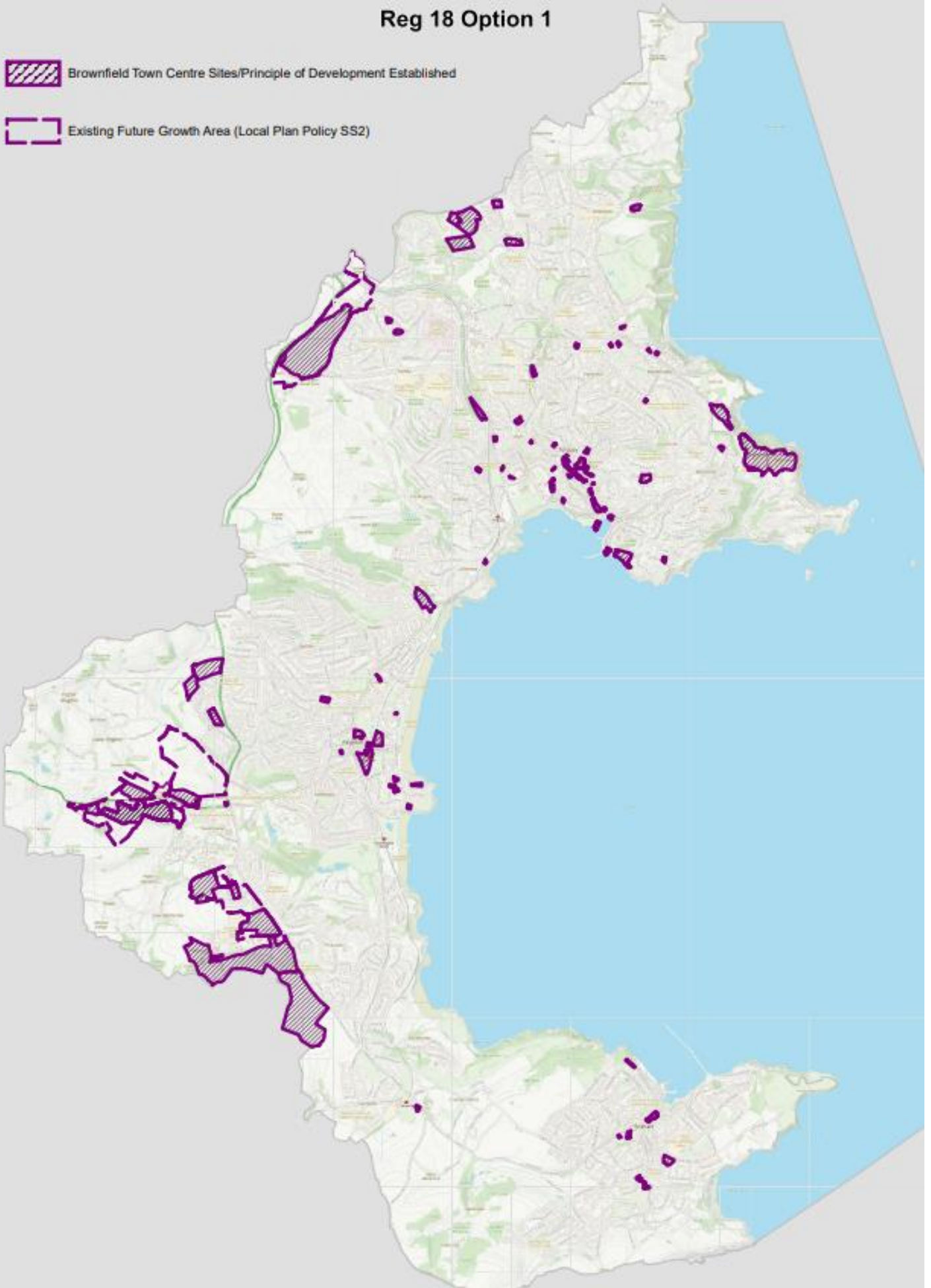
The areas of growth would be on the allocated sites at Edginswell/ Torquay Gateway, and the West of Paignton (Great Parks, Collaton St Mary, and White Rock/Inglewood). There would be an increased focus on urban brownfield sites, and it is likely that tall buildings would need to be promoted in locations such as town centres and areas with sea views. Arguably option 1 places the greatest emphasis on urban regeneration sites – although in theory at least the other options do also retain an emphasis on urban regeneration.

This option could be expected to provide about 250 dwellings a year to about 2030, dropping off to about 190 dwellings a year post 2030 when the greenfield options have been used.

Effectively this would be the current Local Plan but acknowledging that it will take longer than 2030 to build out, i.e., emphasising paragraph 1.2.1 of the current Local Plan text that it covers the Period 2012-30 *and beyond*.

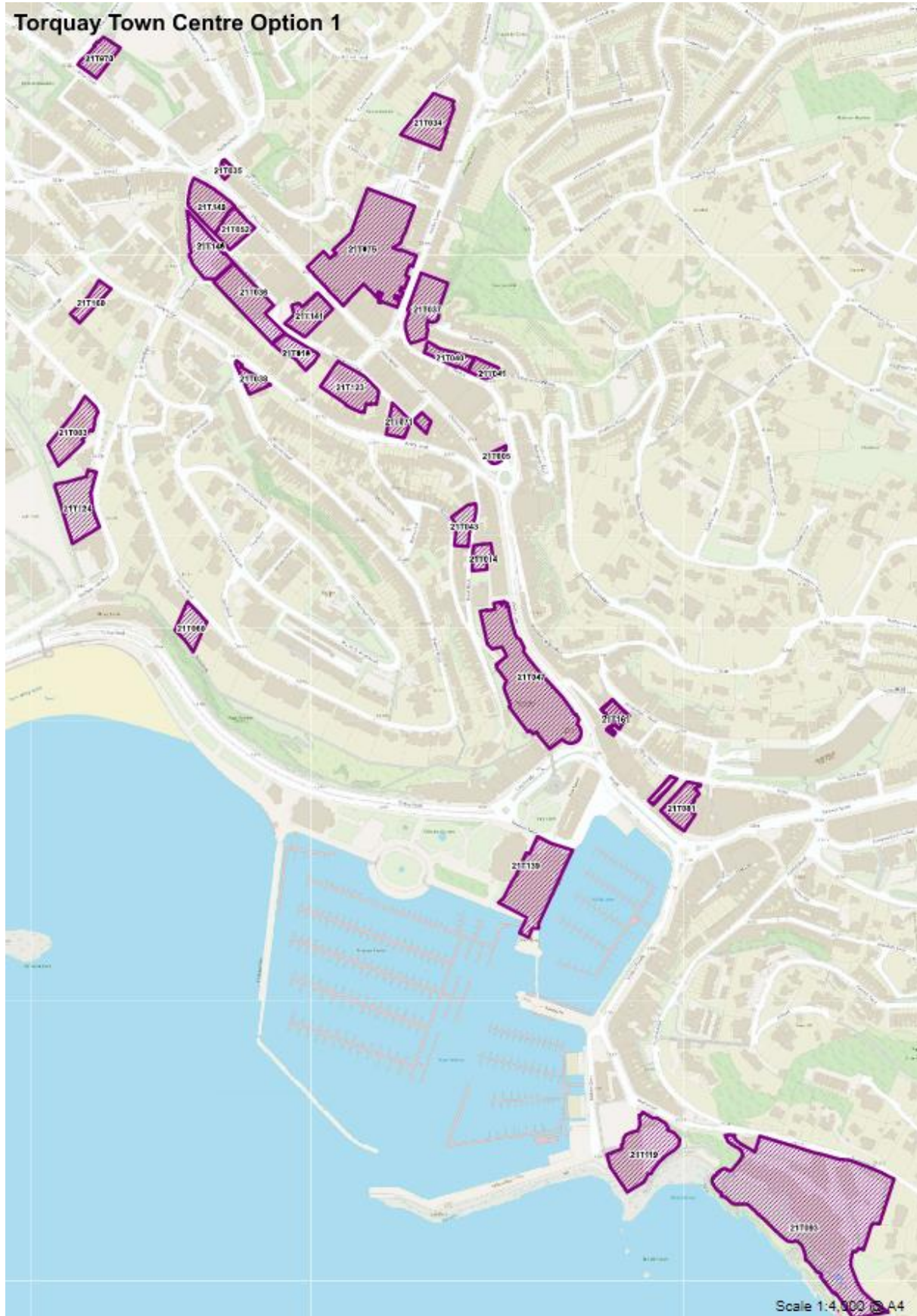
Reg 18 Option 1

-  Brownfield Town Centre Sites/Principle of Development Established
-  Existing Future Growth Area (Local Plan Policy SS2)

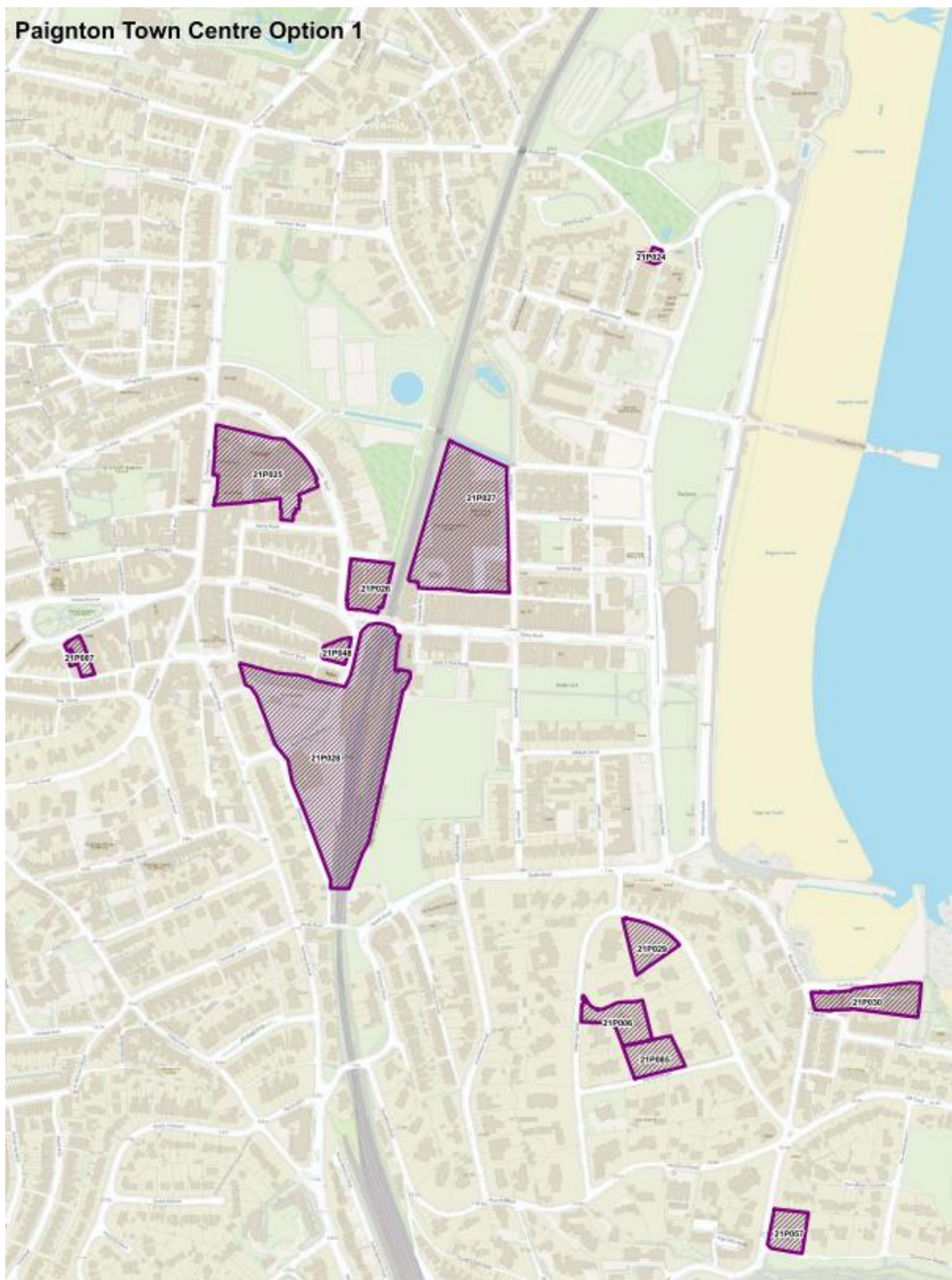


Town Centre Sites

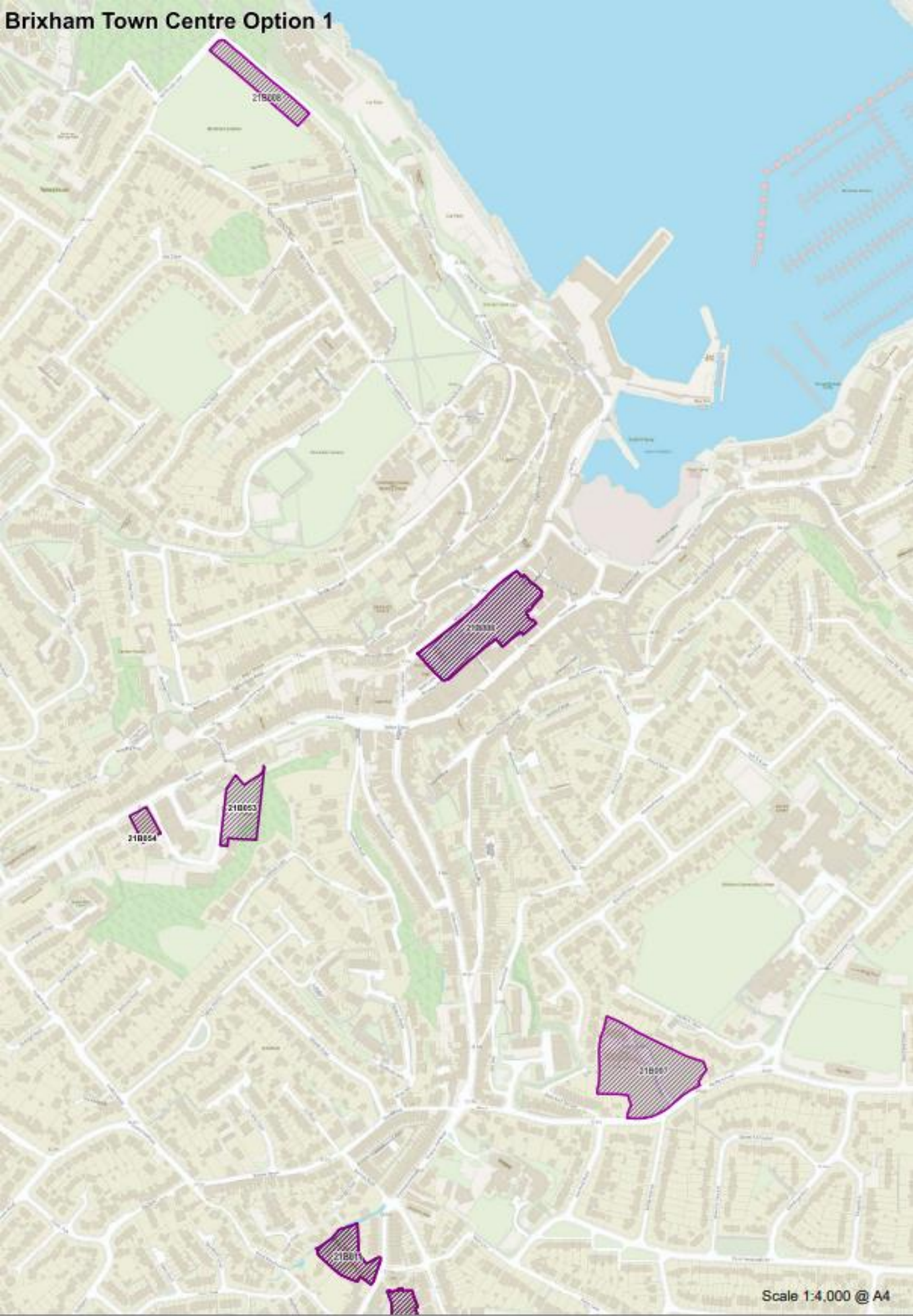
As noted, all of the options will promote town centre regeneration sites town centre sites/" clusters" are shown below, but apply to later options as well. Note that these are indicative, and the Local Plan (as well as national policy) would support the principle of other town centre regeneration sites, should these become available.



Paignton Town Centre Option 1



Brixham Town Centre Option 1



Scale 1:4,000 @ A4

Advantages of Option 1:

This option relies on sites that have already been assessed to be suitable in principle, so would minimise the impact on the environment. Torbay has internationally important environmental designations (the South Hams Special Area of Conservation (SAC) and the Marine SAC; and nationally important designations (e.g., AONB in the south of Torbay, SSSIs and scheduled monuments, Critical Drainage Area). So the reduction in pressure on the natural environment is a significant benefit.

In terms of the Climate Emergency, this option would minimise the environmental impact of development. There would be less loss of open space, and a greater opportunity to locate development closer to existing facilities.

This option places the most emphasis on urban and brownfield sites, and will place the most pressure on developers to build on these sites.

It would place pressure to develop locations that are generally the most sustainably located for services and transport links.

It minimises the impact on Torbay's infrastructure such as drainage capacity, the highway network, schools, surgeries, and hospitals.

Disadvantages of Option 1.

Housing supply will fall significantly below need (about 350-400 dwellings a year below the need).

This would be the most difficult option to get approved by a planning inspector and would place the most pressure on neighbouring authorities as the local unmet need seeks to be provided elsewhere.

If inward migration still arises e.g., from the south-east, house prices will rise, and local people will be increasingly outcompeted in the housing market. This may well increase social inequality, and would impact most heavily on Torbay's poorest people.

There would be very limited opportunities for affordable housing, which will also increase social inequality.

There will be no additional employment land provided, and the option is likely to increase pressure to convert existing employment land to residential uses. So, there is very likely to be a loss of companies and employment in Torbay as employers are forced to relocate to find premises.

Most of the urban dwellings are likely to be apartments rather than family houses. There is limited demand for apartments, and the shortage of family housing could result in a more ageing population. Concerns about future lockdowns, fire safety, leaseholder problems and vulnerability to other shocks are likely to endure, and may make apartment living less desirable.

This option could also increase the dominance of an already over-represented private rented sector if most apartments are buy- to-let rather than purchased by owner-occupiers. Note that this would not be a disadvantage if the accommodation provided is of a high standard. However, if the apartments are of a poor quality, it is likely to increase concentrations of deprivation in already highly deprived Wards.

Town Centre sites often have complex land ownerships, contamination, flooding issues and other matters which mean that they are often time-consuming and expensive to develop. Most of the town centres have

flood risk issues. Even though they are seen as sustainable locations, town centre regeneration can take years to achieve.

There would be an impact on town centre heritage assets such as conservation areas and listed buildings. There may be a danger of “planning by appeal.”

There may be a significant danger of “planning by appeal” on unallocated sites that have been put forward to the HELAA.

Option 2: Limited further greenfield development.

As per option 1, this option would rely on existing allocations and sites with permission. There would be an emphasis on urban regeneration and brownfield land. Several additional greenfield sites would be allocated on land that is assessed in the HELAA to have relatively minor constraints. Some may think that the constraints are more serious than identified by the HELAA and we welcome comments on these.

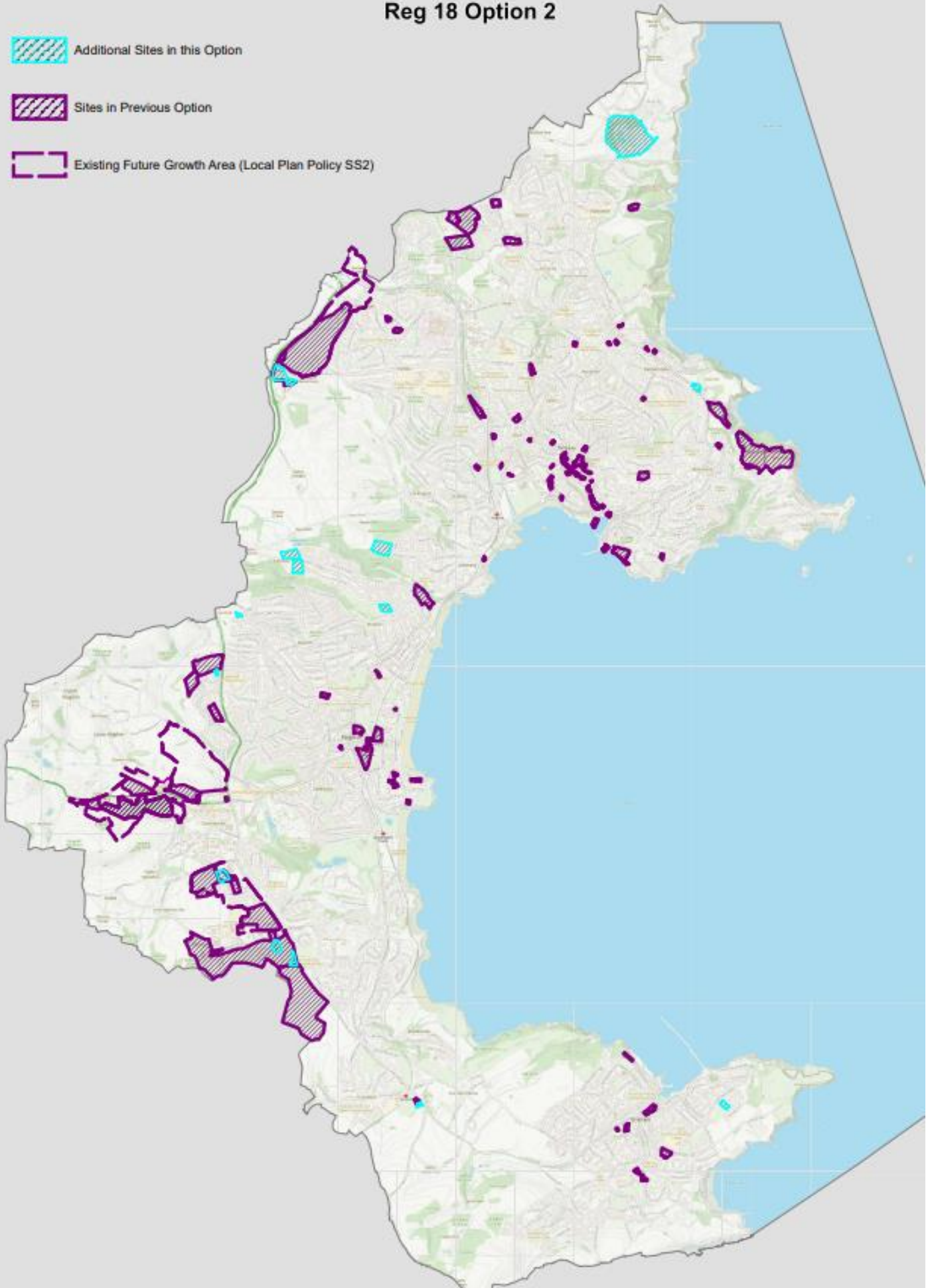
This approach could deliver between approximately 250-300 dwellings a year, depending on the number and density of sites proposed. It is likely that numbers would fall back to around 250 a year if the plan period were extended beyond 2030, as greenfield sites become built out. Clearly the numbers achievable will depend upon which sites are allocated. The list below should therefore be taken as indicative, rather than a finalised list of sites.

HELAA Reference	Key sites that are likely to be allocated under Option 2. (Note that smaller urban sites are not included: see the note on windfalls above).	Likely number of dwellings (Subject to further assessment)
Brixham and BGC Villages		
21B001	Gliddon Ford Filling Station, Dartmouth Road, Churston Ferrers	6
21B026	Wall Park Extensions (R/O Wall Park Farm, 39 Wall Park Rd), Brixham	20
Paignton		
21P009	Sandringham Gardens West of Preston Down Road, Paignton	20
21P017	Land at Preston Down Road North, Paignton	50
21P018	Land at Preston Down Road South, Paignton	50
21P034	Land North of Wilkins Drive/PMU, Paignton	30
21P053	Land rear of Local Centre, Waddeton Close, White Rock Paignton	60
21P079	Land off Limekiln Close, White Rock, Paignton	20
21P081	Land off Fishacre Close, Great Parks, Paignton	10
21P087	Land at James Avenue and east of Reservoir, Paignton	10
Torquay		
21T050	Land adjacent to Broadley Drive, Livermead, Torquay	50

21T064	Sladnor Park, Maidencombe	120
21T072	Babbacombe Business Park, Babbacombe Rd, Torquay	12
21T125	Kingsland , Maldon Road (part of existing Future Growth Area but currently designated for employment use).	90

Reg 18 Option 2

-  Additional Sites in this Option
-  Sites in Previous Option
-  Existing Future Growth Area (Local Plan Policy SS2)



Advantages of Option 2:

Whilst this option allows some limited greenfield expansion, it would avoid the most sensitive areas to the South of Torbay and would minimise the impact on the Special Area of Conservation and AONB, SSSIs and Scheduled Monuments. As noted, the reduction in pressure on the natural environment is a significant benefit.

It provides a modest amount of greenfield land that could provide some affordable housing.

It retains significant emphasis on urban and brownfield sites and will place pressure on developers to build on these sites. The most pressure would remain on developing locations that are generally the most sustainably located for services and transport links.

The impact on Torbay's infrastructure such as drainage capacity, the highway network, schools, surgeries, and hospitals is still relatively minimised.

Disadvantages of Option 2.

Housing supply will remain significantly below need (300-350 dwellings a year below the need). The option is likely to boost housing supply by a maximum of around 450 dwellings above Option 1, which may not be sufficient to prevent growing inequalities.

This would still be a difficult option to get approved by a planning inspector and would place considerable pressure on neighbouring authorities.

There would still be only limited opportunities for affordable housing, which will also increase social inequality.

The problems with over-reliance on apartments noted in option 1 remain.

There would be very limited opportunities for employment development, with consequent likely loss of employers.

There would still be a likely impact on town centre heritage assets such as conservation areas and listed buildings.

There may be a danger of "planning by appeal" on unallocated sites that have been put forward to the HELAA.

Some of the "minor" constraints identified by the HELAA may be felt to be more serious by the local community. Some of the sites allocated are likely to be controversial (although they could be decided on a case-by-case basis).

Option 3: One or two further urban extensions.

This option includes the sites proposed in option two, with the addition of one or two urban extensions. Several possible “sub-options” for the location of the potential urban extension exist.

It is noted that some sites in the Brixham and new Broadsands Churston and Galmpton Villages Neighbourhood Plan Areas are being actively promoted for development, and could be included within this option. A planning application for 132 dwellings at Upton Manor Farm has been submitted (P/2021/0890). However, the sites to the south of Torbay are heavily constrained by the South Devon AONB and South Hams SAC. It also has the poorest transport links with a significant pinch point at Windy Corner, Churston Ferrers.

Whilst Torquay is the most accessible town, fewer sites have been promoted to the HELAA, and the remaining greenfield options have significant landscape issues (albeit not AONB). The Torquay Gateway/Edginswell area is already allocated in the current Local Plan. The HELAA has assessed land at Maidencombe, but this is relatively poorly serviced and would have a severe impact upon the open countryside to the north as well as the undeveloped coastal landscape. Other large greenfield areas in Torbay (insofar as they exist) have not been actively promoted for development in the HELAA.

The bulk of urban extensions since 2010 have been to the West of Paignton, and this area has had some highway upgrading, and a new Primary School is planned at Inglewood.

On this basis the most likely approach under this option is to allocate additional sites to the west of Paignton. It is acknowledged that this option will require further investment in infrastructure in the area, particularly in terms of drainage and improving accessibility. It is also acknowledged that the HELAA has identified these sites as having significant constraints. So, sites with significant constraints would need to be allocated for want of less sensitive options.


This option is estimated to provide between 320-380 dwellings a year, depending upon the mix of sites allocated. The sites below are indicative of those that could be included in this option.


Option 3 Key sites that are likely to be allocated under this option (Additional to Option 2).		
HELAA Reference	Site Address	Likely number of dwellings (Subject to further assessment)
	Paignton	
21P011	Land South of St Mary's Park, Collaton St Mary, Paignton	40
21P012	Lower Yalberton Holiday Park, Long Road (assume mixed use development 50% employment), Paignton	50
21P041	Plot 1&2, Totnes Road, Paignton	8
21P042	Land adj. Bona Vista Holiday Pk, Totnes Rd, Paignton	20

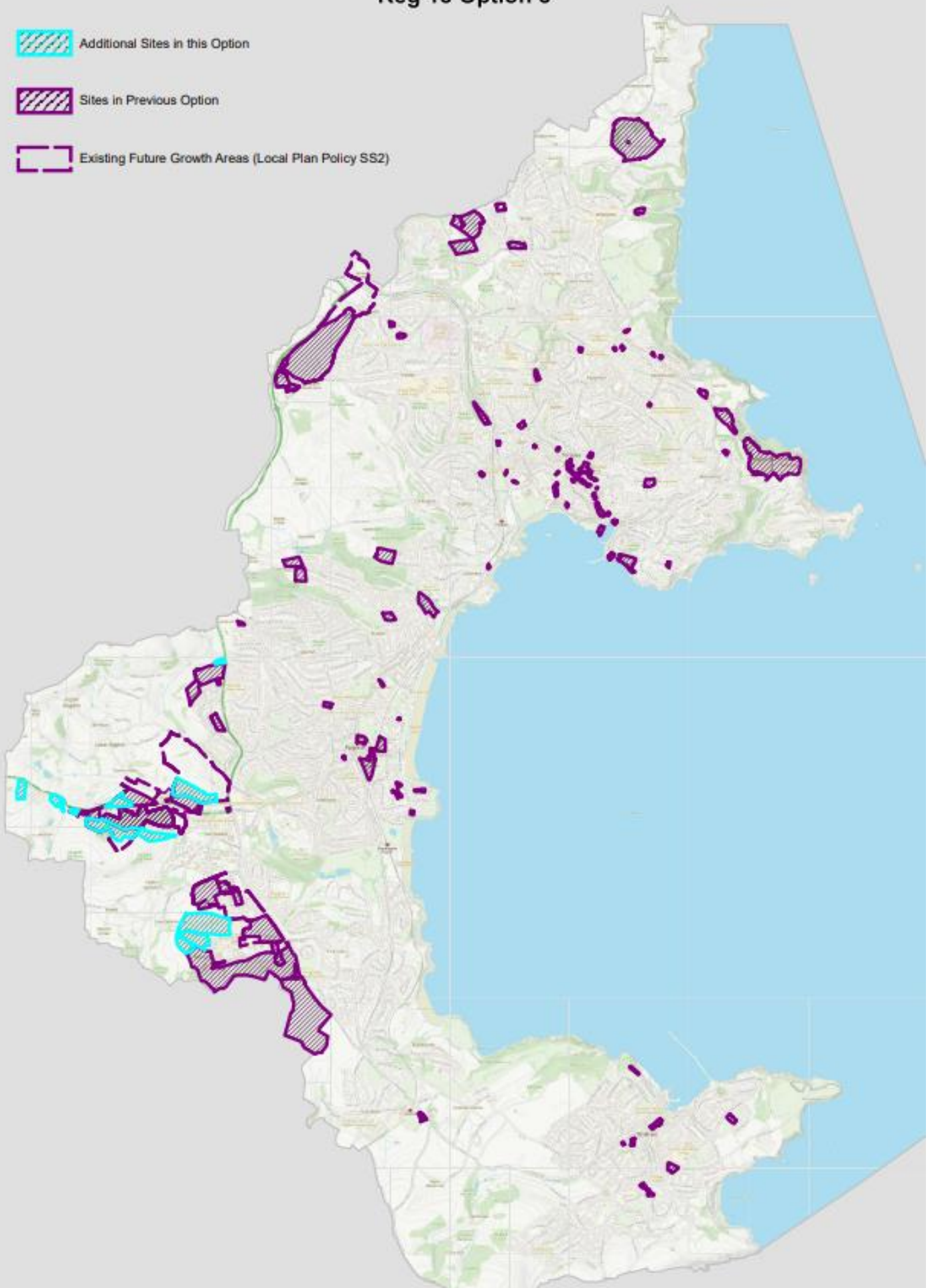
21P043	Land adj. Beechdown Farm Bungalow, Totnes Rd, Paignton	10
21P051	Hilltop Nursery, Kings Ash Rd, Paignton	10
21P056	Land South of Totnes Rd, Collaton St Mary, Paignton	50
21P059	Land at Paignton West, Paignton	40
21P067	Land North of Lower Yalberton Holiday Park, Long Road, Paignton	150
21P071	Land R/O Falcon Park, Totnes Road, Paignton, Paignton	50
21P077	Western half of Taylor Wimpey Site, North of Totnes Rd, Paignton	40
21P078	Land North of Totnes Road (Bloors), Paignton	70
	As noted in the main text, other sites could be included within this Option.	

Reg 18 Option 3

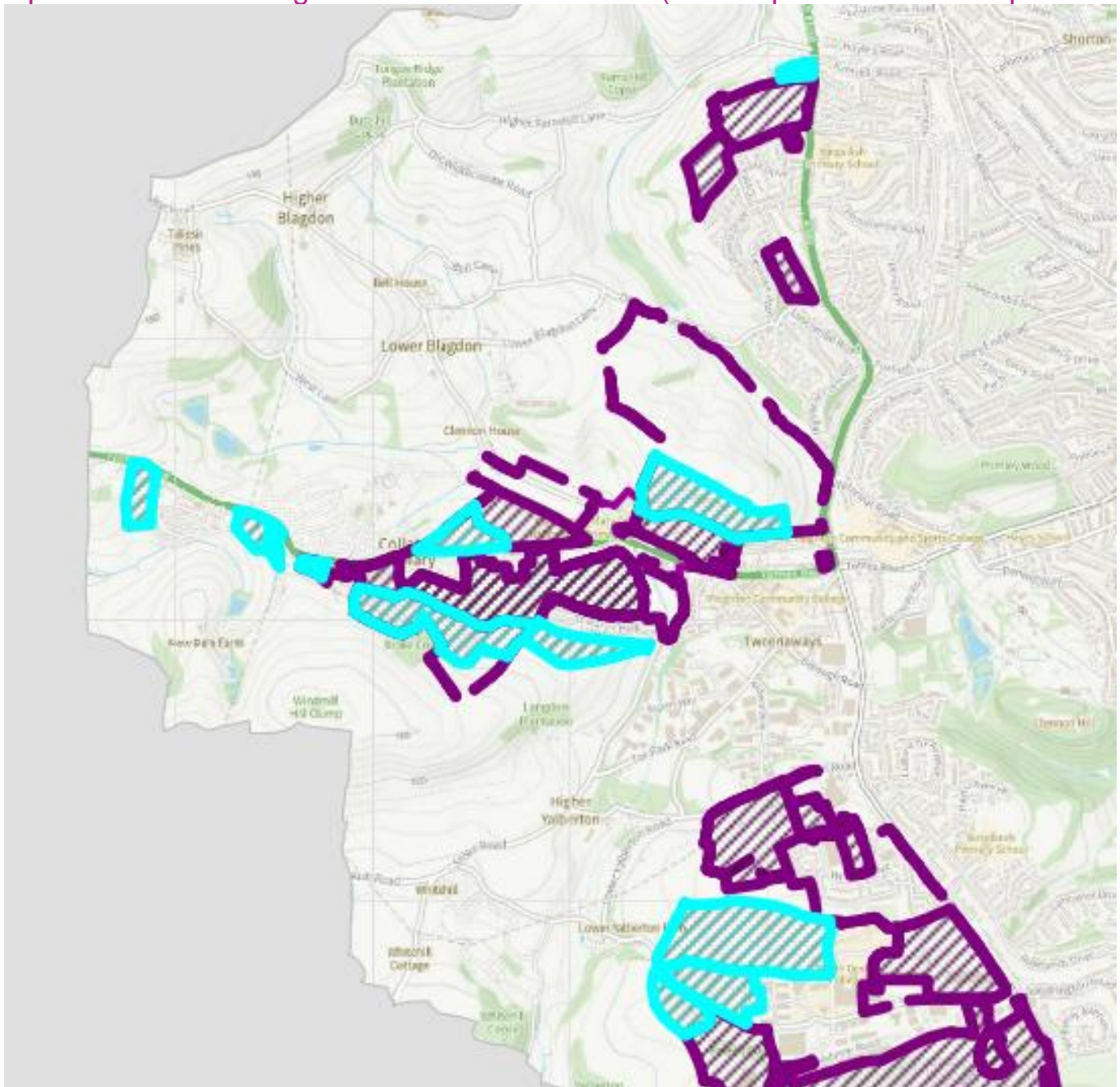
 Additional Sites in this Option

 Sites in Previous Option

 Existing Future Growth Areas (Local Plan Policy SS2)



Option 3: West of Paignton Inset: Potential sites (other Option 3 areas are possible)



Advantages of Option 3:

Whilst this option allows more greenfield expansion, it could avoid the most sensitive areas to the South of Torbay and would minimise the impact on the Special Area of Conservation and AONB, SSSIs and Scheduled Monuments.

Whilst the option will still be difficult to get approved by an Inspector, and still requires Torbay to request our neighbours meet some of our housing need; it shows that Torbay is striving to meet its housing requirement.

It provides additional greenfield land that could provide affordable housing, and some sites for employment development.

It retains a fair emphasis on urban and brownfield sites for the majority of development.

It provides opportunities to focus infrastructure in a relatively concentrated area.

Disadvantages of Option 3.

The option requires the development of sites that have serious constraints. There would be at least some landscape and ecological harm. The extent of this will depend upon the mix of sites allocated.

Without significant infrastructure improvements, the people of Paignton (or wherever an urban extension is located) will doubtless feel that they are being asked to shoulder all the burden.

Housing supply will remain below need (circa 220-280 dwellings a year below the need).

Some of the issues with over-reliance on apartments noted in option 1 remain.

There would still be a likely impact on town centre heritage assets such as conservation areas and listed buildings.

If development does not come forward, the council may still face housing delivery test and five-year supply problems. This is however less acute with option 3 than options 4 or 5 (i.e., the higher the target, the greater the difficulty in meeting the Housing Delivery Test).

Option 4: All sites that have not been ruled out in principle.

This site would seek to allocate all of the sites identified in the HELAA that have not been rejected as inherently unsuitable for development. This includes sites which have significant environmental and deliverability constraints, and would significantly urbanise many of the remaining rural areas of Torbay, including land within the AONB. This option could provide between 470-500 dwellings a year, but it is very unlikely that level of development would be delivered even if allocated. The option is likely to cause very significant landscape and ecological harm.

The council must assess the impact of this option, because of the requirement to seek to meet housing need in the area, but it does not appear from officers' assessment to be a sustainable or achievable option.

An indicative list of sites is set out below. Whilst these would need to be finalised and boundaries etc. refined, they would all be needed under Option 4.

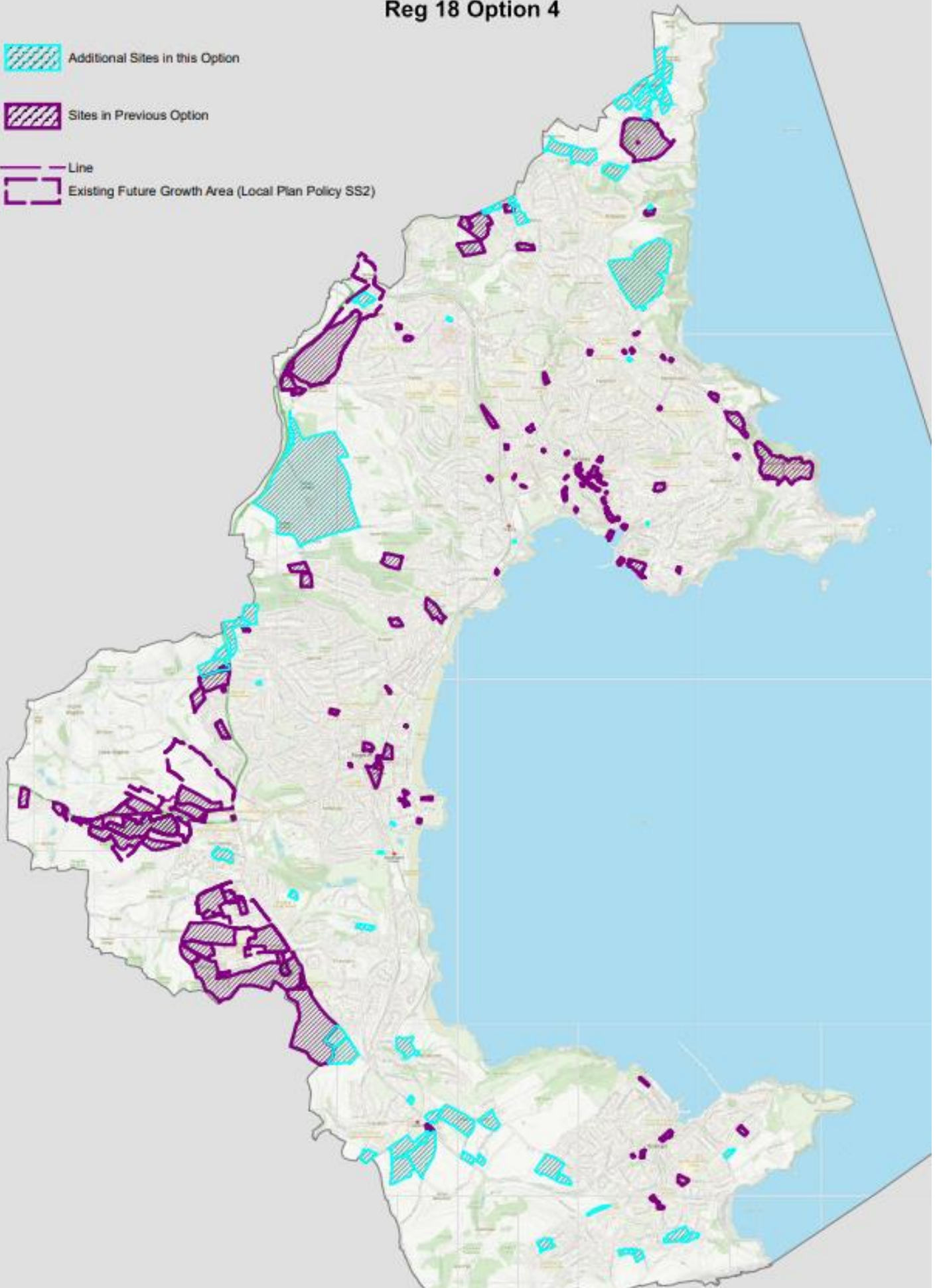
Option 4 Additional Key sites that would be allocated under this option (Additional to Option 2)		
HELAA2021 Ref	Site Address	Likely number of dwellings (Subject to further assessment)
Brixham and BCG Villages		
21B003	Land at Churston (Brokenbury), Churston	100
21B004	Adj. Kennels Road, Churston	200
21B005	Archery Field, Dartmouth Rd, Churston	110
21B013	Churston Golf Club Car Park Only, Dartmouth Road, Churston	10
21B015	Land at Mathill Rd, Monksbridge, Brixham (in BCG Forum area)	70
21B017	Land South of Wayside (Rydons), Brixham	20
21B021	Field off Summercourt Way, Brixham	30
21B023	Field Adj. Brokenbury Quarry, Churston	20
21B025	Copythorne Road, Brixham (in BCG Forum area)	80
21B029	Land off Follafeld Park (western site of 2 fields), Brixham	10
21B031	Land behind Golden Close, Brixham	10
21B034	Churston Road, Churston	10

21B037	Land at Upton Manor Farm Camp Site, St Mary's Road, Brixham	90
21B039	Inglewood Phase 2A south of 21B041, Brixham	80
21B040	Land South of Archery Field (field south of sites 21B004 and 5), Brixham	90
21B041	Inglewood Phase 2 (directly south of approved site), Paignton (BCG Villages)	40
21B042	The Piggery, Elberry Lane (BCG Villages)	
21B043	Land south of Centry Court and Centry Lane, Brixham	10
21B048	Land at Broadsands, Paignton (BCG Villages)	80
21B049	Greenway Road and Greenway Park, Brixham	20
21B052	Land at Green Lane/Bascombe Road, Churston	15
Paignton		
21P029	Angleside House, Paignton	10
21P032	Council Depot, Yalberton	20
21P035	Land at Overclose, Paignton	6
21P039	Land R/O 24 Grange Rd, Paignton	25
21P045	Field off Haytor Avenue, Paignton	20
21P046	Land N & W of Hilltop Nursery, Kings Ash Rd, Paignton	100
21P050	Clennon Valley Car Park (Northern Part), Paignton	6
21P051	Hilltop Nursery, Kings Ash Rd, Paignton	10
21P055	Summerhill Hotel, 2 Braeside Road	11
21P061	Land adjacent to Kings Ash Road, Paignton	50
21P082	Land West of Kings Ash Road, Paignton	20
21P086	Land at Marldon Road, Paignton	50
Torquay		
21T030	Land at Viewpoint, Kingskerswell Road	6

21T055	Watcombe Beach Car Park, Watcombe Beach Rd, Torquay	6
21T056	Kingskerswell Fields A & B, Kingskerswell Rd, Torquay	10
21T059	Land at Orchard Way, Torquay	50
21T065	Land off Teignmouth Rd, Maidencombe, Torquay	40
21T074	Former Four Seasons Hotel, 547 Babbacombe Road	8
21T080	Seabury Hotel, 11 Manor Road	15
21T110	Land at Teignmouth Road, Maidencombe, Torquay	10
21T111	Land at Port Talland Farm, Maidencombe, Torquay	30
21T118	Rear of Farmhouse Tavern, Newton Road, Torquay	50
21T126	Land South of Longpark Hill, Maidencombe, Torquay	40
21T136	Former Market Site, Stantor Barton, Torquay	20
21T137	Stantor Barton, Torquay	300
21T142	Land South of Gabwell Hill, Maidencombe, Torquay	30
21T143	Land North of junction of A379 Teignmouth Rd/Longpark Hill, Maidencombe, Torquay	20
21T144	Land at Sladnor Park Road, Maidencombe, Torquay	8
21T145	Land North of Bottompark Lane, Torquay	20
21T147	Torquay Golf Club (part)	10
21T148	Brunel Manor, Maidencombe, Torquay	15
21T154	Land at Great Hill, Torquay	70
21T155	Land North of Seymour Drive, Torquay	80
21T156	Land East of Teignmouth Road, Maidencombe, Torquay	20
21T157	Land North of Steep Hill, Maidencombe, Torquay	15
21T158	Land at Longpark Hill/Stoke Road, Maidencombe, Torquay	40

Reg 18 Option 4

-  Additional Sites in this Option
-  Sites in Previous Option
-  Line
-  Existing Future Growth Area (Local Plan Policy SS2)



Advantages of Option 4:

This option gets closer to meeting needs and would provide significant opportunities for affordable housing and employment.

Whilst still below the Standard Method, Torbay could show that it is doing all that is possible to meet its housing need.

There is likely to be less impact on conservation areas (but also less regeneration of urban areas).

Disadvantages of Option 4.

The option requires the development of sites that have serious constraints. There would be significant landscape and ecological harm, including to the AONB. There is significant urbanisation of Torbay's remaining countryside area.

Housing supply will remain below need (circa 100 dwellings a year below the need).

The in-combination effects on the South Hams SAC are likely to make the option unachievable on HRA grounds.

There will be much less incentive to regenerate town centres or tackle difficult brownfield sites.

There is no clear overall spatial strategy, so planning for infrastructure would be difficult.

There would be a serious impact on tourism due to further urbanisation.

The option relies on sites that have not been promoted. It is extremely unlikely that they would all come forward, so the option appears undeliverable and in consequence, the council may still face housing delivery test and five-year supply problems.

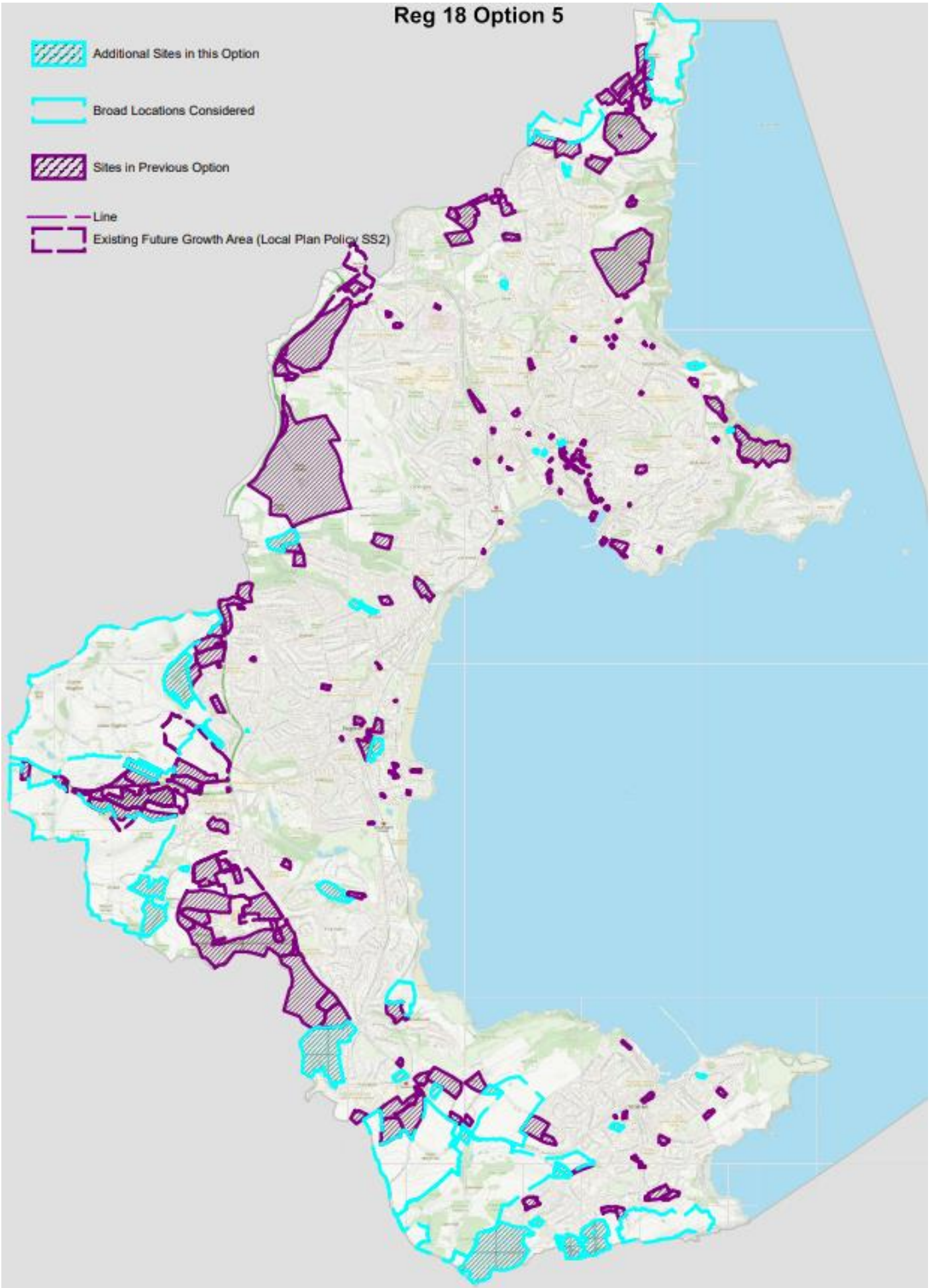
Option 5 Meeting full needs (as calculated by the Standard Method).

To achieve a growth rate of around 600 dwellings per year, all sites including areas rejected by the HELAA would need to be included.

This option would cause very severe environmental harm, and is unlikely to be compatible with Habitats Regulations and other legal requirements. In practice this level of housing would probably outstrip demand and would not be deliverable. However, the option needs to be assessed, because government guidance in the NPPF indicates that Local Plans will be tested on whether they are able to meet the “standard method” housing need figure.

It is not practicable to list sites for option 5, as effectively any site would be subject to development pressure, including sites rejected by the HELAA. In addition to all the sites identified above, it is assessed that about 1,500 dwellings could need to be found on sites identified by officers as unsuitable for development by 2030; and 3,000 if the Plan were rolled forward to 2040.

Reg 18 Option 5



Advantages of Option 5:

In theory this option meets housing needs, and maximises the delivery of housing.

There would be significant opportunities to provide additional employment land and deliver affordable housing.

Because it meets housing need as calculated by the Standard Method, an Inspector would not find the Plan unsound on these grounds (but may have to find it unsound on environmental grounds).

Disadvantages of Option 5:

In practice it considered by officers not to be represent a sound option. The environmental harm that the option would cause would almost certainly result in the Plan being unadoptable due to Habitats Regulations and other environmental objections.

In practice this level of development is unlikely to be deliverable.

Many of Torbay's sites are not flat, which would reduce their viability (and ability to deliver affordable housing or employment).

There will be no incentive to regenerate town centres or tackle difficult brownfield sites.

There is no overall spatial strategy, so planning for infrastructure would be difficult.

There is likely to be a devastating impact on tourism due to further urbanisation.

A Hybrid Option

We are also open to considering a “hybrid” approach, for example that set a minimum housing requirement figure, (for example 200-250 dwellings a year). This would be the minimum requirement and 5-year supply, and the Housing Delivery Test would be measured against it. If not achieved, the NPPF's penalties would take effect, including the Plan being “deemed to be out of date” and the Presumption in Favour of Sustainable Development imposed.

However, a more aspirational figure would also be stated to encourage regeneration sites and would apply only to brownfield and sustainably located sites.

This is an unconventional approach for Local Plans, and it may be argued that housing requirements can always be exceeded if the proposed site is "sustainable". However, having two targets would allow the council to seek to boost housing numbers through urban regeneration, without incurring the penalties currently imposed by the NPPF which can be used to achieve greenfield development. It would set out a recognition that there is a need for housing, but also recognise environmental constraints.

Summary of Growth Options under consideration

(dpa= dwellings per year).

	Name of growth option	What this growth option would mean. (See main text for an explanation of the traffic light coding).	Approximate growth level 10-year Plan	Approximate growth level 20-year Plan	Comment
1.	No further greenfield allocation beyond already allocated or approved sites	All “green” sites and emphasising increasing yield on urban sites.	2,500 (250 dpa)	3,800 (190 dpa)	This option relies on sites that have already been assessed to be suitable, so would minimise environmental harm, but would run out of greenfield housing sites post 2030. There is a substantial shortfall against need and a lack of affordable housing opportunities.
2.	Limited further greenfield development	All urban sites already allocated greenfield sites and "yellow" sites. Identified as having relatively minor constraints.	3,000 (300 dpa)	5,000 (250 dpa)	A limited number of greenfield sites on sites deemed as having relatively minor constraints (i.e., excluding sensitive landscapes such as AONB or sites with high ecological value). Some locally contentious sites are likely to be allocated. There is substantial shortfall against need and limited opportunities to provide affordable housing.
3.	One or two further urban extensions.	As per option 2 all approved and allocated sites, greenfield sites with minor constraints, plus one or two further urban extensions.	3800 (380dpa)	6,500 (320 dpa)	<p>There would be some environmental harm. The impact depends on the location of the proposed urban expansion. Several possible “sub-options” for the location of urban extension(s) exist. It will be noted that some AONB sites in the Brixham and Churston area are being actively promoted for development. Further expansion at the west of Paignton appears to be the most likely candidate, based on sites that are being promoted</p> <p>This option would provide some greenfield opportunities that could deliver some affordable housing, albeit less than the level of need.</p>

4. All sites that have not been ruled out in principle.	All the HELAA, including amber sites with significant constraints must be allocated and delivered at maximum capacity. (Town centres, urban extensions at Maidencombe, Stantor, Great Parks, Collaton St Mary, Churston and Brixham.	5,020 (500 dpa)	9,500 (470 per year)	Local Green Spaces (LGS) could be avoided but there would need to be major development in the Undeveloped Coast and AONB. There is significant impact on very sensitive sites. There is a likely in-combination effects on Habitats Regulations related matters. Note that this option doesn't meet the full objectively assessed need as measured by the government's Standard Method, it is not clear whether the development industry would deliver this level of development even if allocated, due to sites' constraints and market demand. This option is likely to deliver an uplift in affordable housing.
5. Meeting full needs (as required by Government)	To achieve a growth rate of 560-600 dwellings per year all HELAA sites, plus around 2,600 dwellings on sites rejected by the HELAA would have to be developed.	6,000 (560-600 dpa)	12,000 (560-600 dpa)	This option would maximise the delivery of affordable housing. However, it would cause substantial environmental harm, and is unlikely to be compatible with Habitats Regulations and other legal requirements. It is unlikely that the market would deliver this amount of development, even if allocated. It needs to be assessed as the NPPF indicates that Local Plans will be tested on whether they are able to meet the "standard method" housing need figure.
Hybrid Option	<p>The Local Plan could contain a split target, with a lower minimum figure, but a more ambitious aspiration specifically for urban regeneration sites.</p> <p>This would work most effectively with Options 1-3</p>	The figures above are likely to represent the minimums.		<p>This sub-option would set a minimum requirement which would be used to assess the 5 Year Supply and Housing Delivery Test.</p> <p>A more ambitious aspiration would be set for brownfield regeneration sites; but not meeting this upper target would not incur penalties or render the Plan out of date.</p>

A Note on Maps

More detailed maps are available online at [Local Plan Update - Torbay Council](#). These can be zoomed into to show sites in more detail. A summary map of all of the sites, including those rejected by the HELAA (i.e., Option 5) is shown below. It has not been practicable to put higher resolution maps into this documents due to their file size.

Broadly, the purple sites (including Future Growth Areas) are included in Option 1. Yellow areas are introduced in Option 2. Some amber areas would be included in Option 3; and all of the amber areas required in Option 4. A significant number of “red” rejected sites or broad locations would need to be developed under Option 5.

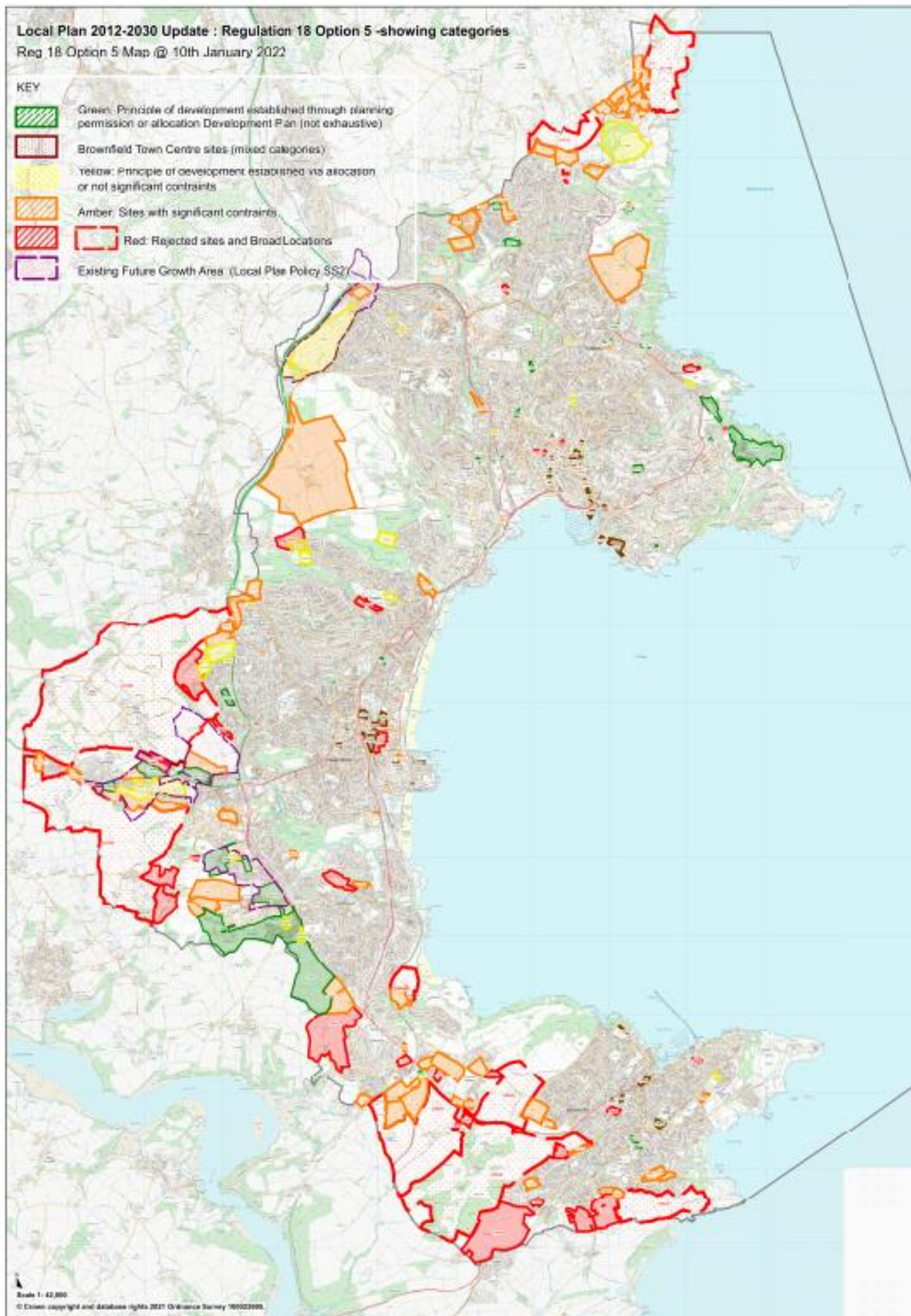
There are some variations to this, for example the Future Growth Areas (i.e., Local Plan allocations) at Edginswell/Torquay Gateway and Collaton St Mary are contained in Option 1 (and outlined purple), but the HELAA has noted that they have some constraints which is why they are coloured yellow on the HELAA map.

Local Plan 2012-2030 Update : Regulation 18 Option 5 -showing categories

Reg 18 Option 5 Map @ 10th January 2022

KEY

-  Green: Principle of development established through planning permission or allocation Development Plan (not exhaustive)
-  Brown: Brownfield Town Centre sites (mixed categories)
-  Yellow: Principle of development established via allocation or not significant constraints
-  Amber: Sites with significant constraints
-  Red: Rejected sites and Broad Locations
-  Existing Future Growth Area (Local Plan Policy SS2)



Next Steps

The Council has made no decision on these options. We want to hear your views!

The Council has made no decision on these options. We want to hear your views. We know that we are not faced with an easy choice, and we want to take as many views into account before reaching decisions on broad options or sites.

Advice from the council's planners is that it will be very difficult to meet the government's "Standard Method" housing need figure. It would cause severe environmental harm and would probably not be built out. However, there is a pressing need for housing, and not providing enough homes will increase the problems faced by local people trying to find a home. There are likely to be other unintended consequences of adopting a low growth rate, such as an ageing population and a fall in the number of young people. Whilst "brownfield sites" are often more sustainable than greenfield sites, they do not provide as much affordable housing; and brownfield regeneration schemes can also prove controversial and difficult to deliver.

Please take these matters into account when making your comments.

How to Make Comments

There is a consultation questionnaire which will enable you to provide your views. The questionnaire can be accessed at www.torbay.gov.uk/consultation

You may also wish to submit written representations. These can be sent via email to: future.planning@torbay.gov.uk or by post to:

Strategy and Project Management
Spatial Planning
2nd Floor North
Tor Hill House
Union St
Torquay
TQ2 5QW

The closing date for all consultation responses is **12 Noon on Monday 28th February 2022**.



We will carefully consider feedback and use comments received to help us decide on the next stage of the Plan. This will be a "Preferred Option" which will set out a draft of the proposed updated policies, site allocations and headline growth rates. We intend to publish this in Spring 2022. The Preferred Option will

be subject to further public consultation, and will then be submitted to the Secretary of State who will appoint a planning inspector to examine the Plan¹⁰.

¹⁰ The Inspector will examine the Plan for soundness against the tests in the NPPF. In particular paragraphs 11 and 35 set out key tests for a Plan's soundness. The Inspector then makes binding recommendations to the Local Planning Authority to approve, reject or make modifications to the Plan.