Consultant in Environmental Planning

Torbay Local Plan

A Strategic Study of the Best and Most Versatile Land Required for Housing and Employment

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Contents

1. Introduction

1.1 As part of the technical evidence base to inform their Local Plan Review and brownfield register, Torbay has undertaken a Housing and Economic Land Availability Assessment (HELAA). This identifies potential sites and assesses whether they are suitable, available, and achievable for housing, employment or other economic development uses. Further guidance is available[1].

1.2 This report is Torbay Council's response to Natural England's request to carry out a strategic study of the potential loss of Best and Most Versatile (BMV) agricultural land[2] to housing and employment allocations in the Local Plan, and it forms part of the Local Plan evidence base. It will inform the Local Plan Sustainability Appraisal (SA), which will accompany the Local Plan Update with reference to Regulations 18[3]. It will also inform the HELAA and other relevant Local Plan policies. The areas referred to in this report have been calculated using GIS measurements carried out by Torbay Council officers.

1.3 The analysis set out in this report applies the most up-to-date guidance on assessing the impacts of development on land and soil, as set out in IEMA's "A New Perspective on Land and Soil in EIA". It should be noted that the assessment of cumulative impacts is described in that document as "a work in progress", and this is an acknowledged limitation to this study.

2. Land Availability

2.1 The following factors determine the practical availability of land suitable for housing development within Torbay. It has a north to south orientation with a largely developed urban coastline, and the built-up area extends inland over much of Torbay. Along the western boundary, agricultural and other land with potential for development, extends from Maidencombe and Edginswell in the north down to Churston Ferrers and Brixham in the south.

2.2 Currently, agricultural land covers just under 30% of Torbay (1826.07ha), and a large proportion of this land is either known, or likely to be BMV land. This reflects the extensive areas of distinctive red-brown loamy and clay loamy soils developed on the Permian rocks that underly much of Torbay. With reference to the Agricultural Land Classification (ALC) surveys described below, the distribution of BMV land in Torbay is shown on the map in Appendix 1.

2.3 There are extensive areas of steep slopes in valleys with a broadly east-west orientation cutting across Torbay. These have a downgrading effect on agricultural land quality, and they can also place a constraint on development. Elsewhere, the South Devon National Landscape (in the Galmpton and Brixham area), the UNESCO English Riviera Global Geopark, the South Hams Special Area of Conservation (SAC) and the Lyme Bay and

[1] www.gov.uk/guidance/housing-and-economic-land-availability-assessment
[2] Defined as Grades 1, 2 and Subgrade 3a according to the 5 Grade Agricultural Land Classification system published by the Ministry of Agriculture Fisheries and Food (MAFF) in 1988.
[3] The Town and Country Planning (Local Planning) (England) Regulations 2012

Torbay Marine SAC, and other national, regional, and local designations also place constraints on development.

2.4 To achieve sustainable development, housing and employment allocations must integrate new land uses with largely existing transport and other service infrastructure. Therefore, in addition to the loss of land to housing and employment, further supporting infrastructure will have to be provided across Torbay and this has also influenced the selection of housing allocations.

2.5 Given these constraints, it is not possible to meet the current Government's "Standard Method" target for housing without a significant BMV land-take. Torbay's objectives are to avoid constraints where possible, to reduce the cumulative loss of the BMV land resource, and to conserve the soils that are displaced by development to maintain soil functions. In carrying out its HELAA, the Council has assessed sites on a traffic-light basis: green, yellow, orange, and red categories of potential Local Plan allocation sites have increasingly severe constraints. Table 1 in Appendix 2 shows the Council's HELAA development constraints categories. Green sites are allocated in the existing development plan or have planning permission. Yellow sites are assessed by officers to have only minor constraints. Amber sites have significant constraints. Red sites have been assessed by officers as being unsuitable for development and therefore rejected by the HELAA.

2.6 In order to attempt to meet the Government's target for housing, the Council has had to select allocation sites with increasingly severe constraints, including BMV land.

2.7 Brownfield sites and suitable sites on lower quality agricultural land have been considered for allocation where practicable, where they are not subject to other constraints. The emerging draft Local Plan Update has introduced a new policy SHS "Overall Housing Strategy and Presumption in favour of Urban Regeneration". This policy supports urban regeneration on previously developed land within the built-up area. It also resists major greenfield development outside of the built-up area, or Future Growth Areas.

2.8 The total area of brownfield land in Torbay is 3,632.36 ha, of which 96.82ha are allocated in Regulation 18, and Table 3 in Appendix 2 sets out the brownfield allocation sites for this option. Table 9 summarises the area of brownfield land in each of the four development scenarios examined in this report. Table 2 shows that in the period from 2012 to 2022 an average of 65% of dwelling completions were on Brownfield land.

2.9 The Council has considered the following development scenarios:

1. the Regulation 18 Local Plan Housing Site Options Consultation, and employment sites: these housing sites were subject to public consultation as part of the Regulation 18 Housing Site Options Consultation (October 2022)[4];
2. Regulation 18 and employment sites and a limited number of additional promoted sites;
3. Regulation 18 and employment sites and further additional sites suggested by officers, post consultation; and

[4] Following the May 2023 Local Elections, Cabinet has requested that the 2020 Local Plan Review be revisited.

4. the HELAA sites: the HELAA identifies sites with potential for future development, it does not allocate sites or imply that planning permission would be granted for development.

2.10 This report focuses on the Regulation 18 and employment land (Scenario 1), but also refers to the implications of the other scenarios.

3. Relevant Guidance

3.1 The principles, evaluation methodology and significance thresholds for the assessment of BMV land loss to development are set out in the IEMA guidelines "*A New Perspective on Land and Soils in EIA*" (February 2022). These guidelines were developed for the EIA process, but they are also applicable to studies at the Strategic Environmental Assessment (SEA) and SA levels.

3.2 This study has also referred to the Planning Inspectorate's Advice Note 17 on Cumulative Effects Assessment (2019)[5].

National and Local Policy on Land and Soil

3.3 The National Planning Policy Framework (NPPF)[6] (2023), recognises the value of BMV land and the need to protect the land and soil resource. "*Planning Practice Guidance for the Natural Environment*" (2019)[7] accompanies the NPPF and states that "*a local planning authority must consult Natural England before granting planning permission for large-scale non-agricultural development on best and most versatile land that is not in accord with the development plan.*" It also advocates the use of ALC information to enable informed choices to be made about planning decisions on the future use of agricultural land. Further guidance to assess the effects of development proposals on BMV land is given in Natural England's "*Guide to Assessing Development Proposals on Agricultural Land*" (2021).

3.4 Therefore, the ALC of a proposed development site must be known, to determine whether the requirements of planning policy are being met. The IEMA guidance (Section 8.3 and Figure 2) sets out a proportionate approach, and the appropriate stage in the planning process for the provision of detailed ALC information to inform planning decisions. It is the responsibility of promoters of development sites to commission ALC surveys, and in general terms, they should make detailed and accurate ALC information available when a planning application is made. However, such information may be required at the strategic planning level to protect the land and soil resource.

3.5 Torbay Council's Local Plan Policy SC4 (Sustainable Food Production) states that *"Development which would result in the detriment to or loss of the best and most versatile agricultural land (Grades 1, 2, or 3a) will only be permitted where there is an overriding need for the development, and it is demonstrated by the applicant that it*

[5] Planning Inspectorate Advice Note 17: Cumulative Effects Assessment Relevant to Nationally significant Infrastructure projects (2019)

[6] National Planning Policy Framework (publishing.service.gov.uk) paragraphs 180(a), 180(b) and 181 footnote 62

[7] https://www.gov.uk/guidance/natural-environment#full-publication-update-history Gov.UK, Natural Environment Agricultural Land and Soil, Paragraph: 001 Reference ID: 8-001-20190721, Revision date: 21 07 2019

cannot be accommodated on lower grade land. Where development is proposed and there is a choice between sites of different grades, development should take place on land of the lowest grade feasible, subject to other Policies in the Plan." This policy will be reviewed in response to the conclusions and recommendations of this report.

3.6 As indicated above, however, geographical, and physical constraints introduce further considerations in the process of selection suitable sites for housing development.

4. Available Baseline Information

Detailed ALC Surveys

4.1 Detailed ALC surveys are generally understood to be those undertaken according to the ALC published by the Ministry of Agriculture Fisheries and Food (MAFF) in 1988, at one auger sample per hectare of agricultural land and showing ALC Grades/Subgrades on maps at a scale of 1:10,000 or larger. Such surveys were carried out by ADAS in its then statutory role on behalf of MAFF, in 1994 in the following survey areas within Torbay:

- Maidencombe;
- Edginswell;
- Collaton St Mary;
- Long Road, Goodrington;
- White Rock, Goodrington; and
- Churston Ferrers.

4.2 The results of these 1994 ALC surveys are shown on maps available on the MAGIC website[8]. It is notable that substantial blocks of lower quality land have been identified on these maps at Maidencombe, Edginswell and Goodrington.

A Semi-detailed ALC Survey

4.3 In 1985 a semi-detailed ALC field survey was carried out by MAFF on most of the agricultural land within Torbay, and the results (including the subdivision of Grade 3) are shown on a map at a scale of 1:25,000. This survey predated the publication of the revised ALC criteria in 1988, and it was superseded by the detailed ALC surveys undertaken over large parts of Torbay in 1994. It should be noted that the assessment of the gradient limitation i.e. the steepness of the ground surface (an important consideration in the Torbay area due to the presence of large areas with steep slopes) remained unchanged in the revised ALC criteria. Therefore, land downgraded (often to Subgrade 3b) in the 1985 survey is similarly downgraded in post 1988 ALC surveys.

Predictive ALC Information

4.4 Natural England produced Predictive BMV ALC maps based on a mosaic of available detailed post 1988 ALC survey results, combined with predicted ALC Grades/Subgrades in areas not surveyed in detail at that time, to provide a more complete picture of agricultural land quality, and in particular an estimate of the total proportion of Grades 1, 2 and Subgrade 3a within administrative areas like Boroughs and Districts. The

[8] https://magic.defra.gov.uk/

predictions were made by Natural England, and based on published information on climate, geology, topography, and soils, and very few field observations. For Torbay, they did not include information available from the 1885 ALC survey. The predictive results are shown on highly generalised maps at a scale of 1:300,000, published in 2017.

4.5 Natural England has agreed that these predictive ALC maps are not sufficiently accurate for use in the assessment of individual fields or development sites. Therefore, Natural England has accepted the use of the 1985 ALC survey results as the best available alternative to the predictive maps in areas not covered by the detailed 1994 surveys.

5. Analysis of the Local Plan BMV Land-take

5.1 The map in Appendix 1 shows the distribution of BMV land in Torbay according to the 1985 and 1995 surveys. The potential allocation sites for employment and the four development scenarios are listed in the following tables in Appendix 2 to this report:

- Table 4 for Potential Employment Sites;
- Table 5 for Potential Regulation 18 + Employment Sites;
- Table 6 for Potential Regulation 18 + a Limited Number of Additional + Employment Sites;
- Table 7 for Potential Regulation 18 + Further Additional Sites + Employment Sites; and
- Table 8 The HELAA + Employment Sites.

5.2 The potential allocation sites set out in these tables comprise agricultural land, and the proportion of each of the sites classified as BMV land is given in these tables. Table 9 summarises the BMV land loss performance of these scenarios.

Torbay BMV – Overall Land Loss Context

5.3 It is calculated that there is 1826.07ha of agricultural land in Torbay. In the national context, it is estimated by Natural England that around 42%[9] of agricultural land in England and Wales is BMV and 766.96ha within Torbay. Using the 1994 and 1985 ALC maps, 47% (858.25ha) is likely to be BMV, and 967.82ha is likely to be lower quality Subgrade 3b (which from 1988 includes 3c) and Grade 4. This puts the performance of the Local Plan Update in terms of sustainable development in its local context. A higher BMV land-take than 42% is to be expected for development that has to take place within Torbay.

Torbay BMV Land Loss Performance – Individual Allocation Sites and Scenarios

5.4 With reference to the 1985 and 1994 ALC maps, the total land-take figures in Tables 4 to 8 can be compared with the overall percentage of BMV land in Torbay to give the performance of each potential allocation scenario in respect of BMV land-take. Table 9 in Appendix 2 summarises the results of this analysis. It should be noted that no land has been returned from developed to agricultural use in records to date, however this will be monitored.

5.5 The focus of this report is on the October 2022 Regulation 18 scenario, including employment sites (Appendix 2, Table 5). The BMV land loss for this scenario is 119.4ha (i.e. housing 103.4 + employment 16.0ha). In the local context (as set out above), and at

[9] MAFF press notice (1996), based on analysis undertaken in 1994 by ADAS 'Revised statistics for the proportion of ALC grades', for the revised (1988) ALC system.

51.5% of the agricultural land required for these sites, this exceeds the 47% figure for all BMV land in Torbay by 4.5%. There is no established or recognised cut-off, in terms of what percentage figure is acceptable, but given the other constraints on development in Torbay described above this can be considered a reasonably proportionate outcome, given the scale of the development.

5.6 In the local context, Table 9 shows that scenarios 2 and 3 exceed the 47% figure for BMV land in Torbay by 5.3% and 6.6%. At 40.1% BMV, the HELAA scenario has a better performance than the Regulation 18 including employment scenario in the proportion of BMV land-taken, but it would involve the additional loss of 531ha of BMV land.

6. Cumulative Impact Considerations

6.1 This part of the study considers whether the anticipated rate of cumulative loss of BMV land according to the Local Plan is a proportionate response to the NPPF requirement.

6.2 There is no officially recognised cumulative impact assessment methodology, but the overall figures for BMV land-take arising from the Local Plan housing and employment allocations can be interpreted with reference to Annex H of the IEMA Guidance. This IEMA guidance is described as a "work in practice", and as such it has no formal standing. However, this guidance is recognised by Natural England, and it sets out parameters for the assessment of cumulative impacts, based on some current informal practice.

6.3 The Planning Inspectorate's Advice Note 17 on Cumulative Effects Assessment (2019), paragraphs 3.4.7 and 3.4.8 state only that a CEA "should be undertaken to an appropriate level of detail, commensurate with the information available at the time of assessment". This does not appear to provide a practicable methodology or significance threshold that would offer an alternative to the IEMA guidelines used by Torbay, which apply the best ALC information available, using a combination of the 1985 and 1994 ALC survey results.

6.4 The rate of the cumulative loss of BMV land in Torbay with reference to a rolling sequence of 5-year national averages of BMV land loss is a further part of the assessment of the significance of agricultural land loss impacts in the IEMA guidelines. Annex H refers to the loss, at a single proposed development site, of more than 1% of the average annual loss of BMV land in England and Wales over a 5-year period as a significant cumulative effect.

6.5 According to the Department for Levelling Up, Housing and Communities (DLUHC) website[10], the figures for land changing use from "Agriculture" to "Other Developed Use" are not available for the year 2017/18. Therefore, the available 5 years of data must extend from 2016 to 2022 (i.e. five years of data over a 6-year period). For the 5 recorded years from 2016 to 2022 the annual land loss is 4,926ha. At 42%, the total national loss of BMV land in this period is estimated to be approximately 2,069ha per annum.

[10] https://www.gov.uk/government/collections/land-use-change-statistics#land-use-change:-hectarage (See Table p361)

Torbay BMV Cumulative Land Loss Performance

6.6 Table 9 shows that the BMV land loss for the Regulation 18 scenario, including employment sites, is 6.63ha pa over the 18-year period (2022 to 2040) covered by the Local Plan Update. This is 0.32% of the total national loss of BMV land in this period (estimated by DLUHC to be approximately 2,069ha per annum) and this is less than the 1% cumulative significance threshold.

6.7 Table 9 shows that scenarios 2 and 3 at 0.35 to 0.51% are also below the 1% cumulative significance threshold, but at 1.75% the HELAA scenario exceeds the threshold. It is notable that whilst the HELAA and employment scenario would take the lowest proportion of BMV land, it has the least sustainable cumulative impact. Whereas this scenario might take a lower proportion of BMV land, it would take a greater total area of BMV land.

6.8 The Regulation 18 and employment scenario (Table 5) has the best national cumulative performance. The HELAA and employment scenario (Table 8) has the best local BMV land-take performance, but it would take a total of 643ha of BMV compared to 119ha for the Regulation 18 and employment scenario. The different national and local baseline BMV baselines (42% and 47%) have no bearing on this analysis as the calculations are based on actual local hectarages derived from detailed and semi-detailed ALC surveys, and the 42% BMV figure.

6.9 The largest single site in the Regulation 18 and employment scenario (21B002: Inglewood - Land to the South of White Rock) involves the loss of 31.2ha of BMV land (which is 1.5% of the national 2,069ha figure). This site alone would exceed the 1% threshold for a significant cumulative loss of BMV land for a single site. However, this site would be developed over several years and therefore it could be argued that this reduces the significance of this cumulative impact, however, this point is not addressed by the "work in progress" IEMA methodology.

7. Conclusions

7.1 As stated above, the NPPF (2023) requirement is that *"a local planning authority must consult Natural England before granting planning permission for large-scale non-agricultural development on best and most versatile land that is not in accord with the development plan."* Therefore, this study has been commissioned to inform the preparation of the Local Plan Update and potential site allocations. In its Local Plan, Torbay should seek to select allocation sites and accommodate development on land of the lowest grade feasible, subject to the geographical and physical constraints described above, and with reference to other relevant policies in the plan.

7.2 At the local level land taken for the Regulation 18 and employment allocations (Table 5) would slightly exceed the 47% baseline proportion of such land within Torbay. However, given the relatively high proportion of BMV land and the other constraints on development in Torbay, this is an acceptable outcome. At the national level the preferred allocations would have no significant cumulative impact i.e. 0.32% is significantly less than the 1% national figure.

7.3 In view of this, the results of this study show that the Council has taken a proportionate and reasonable approach to the development of Brownfield sites, and the conservation

of BMV land in the implementation of the Local Planning Authority's targets for new housing and employment within the revised plan period.

8. Recommendations

8.1 IEMA guidance (Section 8.3 and Figure 2) sets out the appropriate stage in the planning process for the provision of ALC and soil resource information to inform planning decisions. This information has not generally been required in detail at the strategic planning stage, it is more often made available at a later stage in support of a planning application. However, such information may be required at the strategic planning level to protect the land and soil resource.

8.2 Therefore, when alternative locations for development are being considered at the strategic level, this information should be known with a reasonable degree of accuracy to avoid the promotion of sites that might prove to be unacceptable at the planning application stage, due to the presence of high-quality agricultural land or unsuitable soils that could be damaged during construction, leading to the downgrading of land.

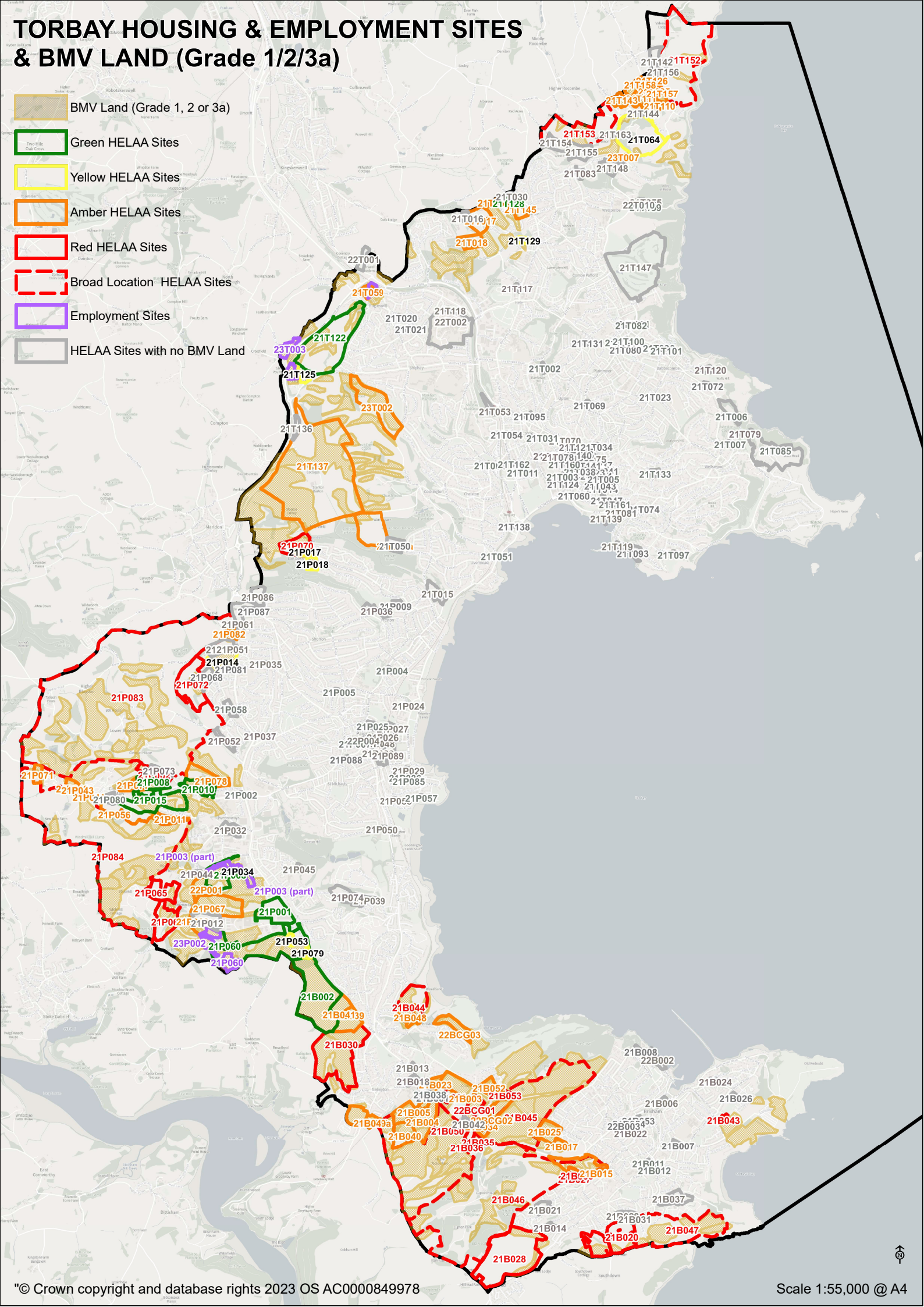
8.3 The objective, therefore, is to determine at the earliest opportunity in the planning process an accurate ALC classification, and to calculate the volumes and qualities of topsoils and subsoils that would be displaced by allocations and planning applications.

8.4 Detailed site specific ALC and soil resource surveys should be commissioned by the promoters of alternative development sites, who should use this information to set out their proposals for the conservation of soil resources displaced by development. The specifications for these detailed surveys are set out in Annexes B and C of the IEMA Guidelines.

8.5 With the provision of ALC and soil information, layout and design principles can be applied at an early stage in the planning process to mitigate the impacts of development proposals by minimising the footprint of hard development on BMV land and reducing the consequent displacement of soil resources. Soft green uses (that retain soils in situ) should, where possible, be located on BMV land within development sites in areas that remain accessible from residual agricultural land for future viable agricultural use. Advice on this approach is set out in Part III of the IEMA Guidelines. An indication of the likely volumes of any on-site soil handling and any off-site movements of topsoils, and subsoils is required, together with commitments from those promoting development to ensure their subsequent sustainable use.

APPENDIX 1: Torbay Housing and Employment Sites and BMV Land

TORBAY HOUSING & EMPLOYMENT SITES & BMV LAND (Grade 1/2/3a)



Scale 1:55,000 @ A4

APPENDIX 2: A Strategic Study of the Best and Most Versatile Agricultural Land in Torbay

Table 1: The HELAA traffic-light key (as used in Tables 3 to 9 below)

Sites which are allocated in the existing development plan or have planning permission	
Sites are assessed by officers to have only minor constraints	
Sites have significant constraints	
Sites have been assessed by the officers as unsuitable for development and, therefore, rejected by the HELAA.	

Table 2: Dwelling Completions on Brownfield Land 2012-2022

Period	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	Average
Brownfield	**72%**	**74%**	**75%**	**68%**	**63%**	**59%**	**60%**	**58%**	**66%**	**56%**	**65%**
Greenfield	**28%**	**26%**	**25%**	**32%**	**37%**	**41%**	**40%**	**42%**	**34%**	**44%**	**35%**

Table 3: Potential Sites for Regulation 18 (October 2022) + Employment sites on Brownfield land

No.	HELAA Ref.	Brownfield Site	Site Size (ha)
1	21T032	Town Hall Car Park	0.63
2	21T070	Magistrates Court	0.12
3	21T035	Municipal Chambers	0.02
4	21T034	14 Market Street/ land rear of market Street	0.24
5	21T075	Union Square	1.01
6	21T140	Land rear of Castle Circus House	0.22
7	21T141	Former New Look Store	0.15
8	21T037	Former Blockbuster/Morrisons, Pimlico	0.25
9	21T040	3-9 Pimlico	0.08
10	21T041	Pimlico	0.06
11	21T123	Telephone Exchange/Offices Lower Union Lane	0.23
12	21T038	Roebuck House	0.07
13	21T043	Adj. Abbey Hall (former Laundry Site)	0.1
14	21T014	Swan Street	0.07
15	21T161	30-34 The Terrace	0.06
16	21T081	Former Debenhams	0.16
17	21T139	The Marina Car Park (adj. The Pavilion)	0.38

No.	HELAA Ref.	Brownfield Site	Site Size (ha)
18	21T119	Living Coasts	0.24
19	21T093	The Imperial Hotel	2.22
20	21P025	Crossways Shopping centre	0.47
21	21P027	Victoria Square	0.89
22	21P028	Station Lane, Great Western Road	2.94
23	21P048	Station Square, Opposite Railway Station	0.07
24	21B006	Town Centre Car Park Middle Street	0.79
25	21P080	Torbay Holiday Motel, Totnes Rd, Collaton St Mary	1.75
26	21P001	Land off Bxm Rd (Devonshire Park)	9.78
27	21T148	Brunel Manor, Conversion of buildings only	3.65
28	21T072	Babbacombe Business Park, Babbacombe Rd, Torquay	0.64
29	22T002	Torbay Hospital campus	19.79
30	21T069	Hatfield House (site of), Hatfield Cross	0.62
31	21T138	Grand Hotel Garage Block	0.08
32	21T021	Site 1 Higher Cadewell Lane	0.45
33	21T020	Site 2 Higher Cadewell Lane	0.29
34	21T131	Westhill Garage, Chatto Road	0.19
35	21T101	Exmouth View Hotel, St Albans Road	0.10
36	21T080	Seabury Hotel, 11 Manor Road, Torquay	0.18
37	21T023	Quintaville, Junction of Reddenhill Road	0.10
38	21T085	Stoodley Knowle, Ansteys Cove Road, Torquay	17.40
39	21T006	Palace Hotel, Babbacombe Road	3.00
40	21T002	Former Dairycrest, Parkfield Road	0.45
41	21T095	R/O Edinburgh Villas, McKay Avenue, Torre Marine	0.29
42	21T003	Shelley Court Hotel, 29 Croft Road, Torquay	0.22
43	21T044	Brampton Court Hotel, St Lukes, Road South	0.11
44	21T060	Conway Court, Warren Road	0.12
45	21T124	Sheddon Hall Hotel Site, Shedden Hill	0.27
46	21T054	Bancourt Hotel, Avenue Road	0.17
47	21T015	Hollicombe (former gas works)	3.09
48	21P051	Hilltop Nursery, Kings Ash Road	0.64
49	21P055	Summerhill Hotel, Braeside Road	0.16
50	21P088	Former Kia Garage, Totnes Road	0.29
51	21P007	38-40 Palace Avenue, Paignton	0.19
52	21B001	Gliddon Ford Filling Station, Dartmouth Road, Churston Ferrers	0.28
53	21B007	Brixham Paint Station, Kings Drive	0.96
54	21B008	Site of Northcliff Hotel	0.29
55	21B011	St Kildas (Specialist housing)	0.22
56	21B053	Torbay Industrial Estate Part 1	1.30
57	21B010	St Marys Road (Old Dairy Buildings)	0.56
Employment land			17.72
Totals			**96.82**

Table 4: Potential Employment Allocation Sites on Agricultural land

No.	HELAA Ref.	Identified Site	Site size (ha)	BMV (ha)	BMV %
Sites where post-1988 ALC survey data is available					
1	21T059*	Land at Orchard Way	5.91	1.07	18.10
2	21T125	Kingsland, Marldon Road	3.26	1.79	54.99
3	21P003	Land adjacent to PMU, Wilkins Drive / Berry Acres Emp Land	2.96	2.37	80.07
4	21P034	Land north of Wilkins Drive/PMU	1.50	0.89	59.33
5	21P060	White Rock (employment)	4.77	3.34	70.02
6	23P002	Land North of Peter's Copse, Long Road	1.71	1.57	91.00
7	23P003	Land South of Peter's Copse, Long Road	2.50	2.16	86.40
Sites where only semi-detailed 1985 ALC survey data is available					
8	23T003	Land adjacent Ridge Lane /Moles Lane	2.96	2.81	94.93
Totals			**25.57**	**16.00**	**62.57**

The local Plan Update Potential Growth Scenarios

Table 5: Potential Sites for Regulation 18 (October 2022) + Employment Land on Agricultural land

	HELAA Ref.	Identified Site	Site size (ha)	BMV (ha)	BMV %
Sites where post-1988 ALC survey data is available					
1	21T064	Sladnor Park, Maidencombe	21.91	1.35	6.16
2	21T122	Land at Hamelin Way and Moles Lane, Edginswell	35.05	10.03	28.62
3	21P008	Land to the North of Totnes Road (Taylor Wimpey)	4.79	4.68	97.70
4	21P015	South of Totnes Rd, Collaton St Mary	15.08	5.88	38.99
5	21P053	Land at the Local Centre, White Rock	1.22	0.63	51.64
6	21P060	White Rock (housing)	2.16	1.89	87.50
7	21P067	Land North of Lower Yalberton Holiday Park, Long Road	13.92	11.89	85.42
8	21P077	Western half of Taylor Wimpey Site, North of Totnes Road	2.66	2.66	100.00
9	21P079	Former Farmhouse, White Rock	0.76	0.10	13.16
10	22P001	Yalberton Holiday Park/Berry Acres 'Link'	4.93	3.10	62.88
11	21B002	Land to the south of Whiterock (Inglewood)	31.59	31.23	98.86
Sites where only semi-detailed 1985 ALC survey data is available					
12	21T056	Kingskerswell Fields A & B, Kingskerswell Road	1.08	1.08	100.00
13	21T129	Hatchcombe Lane, Scotts Bridge/Barton	1.30	0.09	6.92
14	21T145	Land North of Bottompark Lane	2.30	0.61	26.52
15	21P001	Land off Brixham Road (Devonshire Park)	9.78	0.35	3.58
16	21P003	Land south of Yalberton Road (Berry Acres)	11.47	5.48	47.77
17	21P010	Land North of Totnes Road (Bloors)	18.00	4.34	24.11
18	21P014	Site North of Luscombe Lane Great Parks	6.10	6.10	100.00
19	21P017	Land at Preston Down Road North	2.00	1.02	51.00
20	21P018	Land at Preston Down Road South	1.80	0.92	51.11
21	21P042	Land adjacent to Bona Vista Holiday Park, Totnes Road	4.18	1.14	27.27
22	21P043a	Land adjacent to Beechdown Farm Bungalow, Totnes Road (extended)	0.69	0.61	88.41
23	21P078	Land North of Totnes Road (Bloors)	6.16	2.71	43.99
24	21B005	Archery Field, Dartmouth Road	5.53	5.39	97.47
Reg 18			206.26	103.40	50.13
Employment Land (as in Table 3 above)			25.57	16.00	62.57
Totals			**231.83**	**119.40**	**51.50**

Table 6: Potential Sites for Regulation 18 (October 2022) + Limited Number of Additional Sites + Employment Sites on Agricultural land

This scenario includes the sites in Table 4 above.

No.	HELAA Ref.	Identified Site	Site size (ha)	BMV (ha)	BMV%
Sites where post-1988 ALC survey data is available					
1	21B015a	Land at Monksbridge Road	10.12	5.05	49.9
2	21B025	Copythorne Road	6.12	5.31	86.77
Limited number of sites			16.24	10.36	63.79
Reg. 18 (as in Table 4)			206.26	103.40	50.13
Employment Land (as in Table 3)			25.57	16.00	62.57
Totals			**248.07**	**129.76**	**52.31**

Table 7: Potential Allocation Sites for Regulation18 + Additional Sites + Employment Sites on Agricultural land

This scenario includes the sites in Table 4 above.

No.	HELAA Ref.	Identified Site	Site size (ha)	BMV (ha)	BMV %
Sites where post-1988 ALC survey data is available					
1	21T065	Land off Teignmouth Road, Maidencombe	1.55	1.55	100.00
2	21T111	Port Talland Farm, Maidencombe	3.18	3.18	100.00
3	21T143	Land south of Longpark Hill, Maidencombe	2.58	1.82	70.54
4	21T158	Land at Longpark Hill/ Stoke Road Maidencombe	2.80	1.39	49.69
5	23T002	Land at Nut Bush Lane	16.80	11.15	66.37
6	23T007	Land north of Brunel Manor	0.47	0.12	25.53
7	21P056	Land South of Totnes Road, Collaton St Mary	7.79	0.23	2.95
8	21B004	Land adjacent Kennels Road	9.67	9.54	98.66
9	21B015	Land at Mathill Road	0.83	0.68	81.92
10	21B017	Site north of New Road/south of Wayside	1.49	1.24	67.03
11	21B025	Copythorne Road	6.12	5.31	86.74
12	21B052	Land at Green Lane/Bascombe Road	3.43	2.59	75.49
13	22BCG002	Land East of Ferrers Green	6.64	5.14	77.41
14	22BCG003a	Part Elberry Farm, Broadsands	1.74	1.26	72.41
15	23BCG002	Site NE of Alston Reservoir, Kennels Road	4.33	3.91	90.3
Sites where only semi-detailed 1985 ALC survey data is available					
16	21T017	Torquay Holiday Park	6.34	0.05	0.79
17	21T018	Land to the north of Nuthatch Drive	4.06	0.25	6.16

18	21T050a	Wider land at Broadley Drive, Livermead	16.64	1.63	9.79
19	21T110	Site of Step Hill, Maidencombe Cross	0.87	0.11	12.63
20	21T126	Land south of Longpark Hill, Maidencombe	1.87	0.50	26.74
21	21T157	Land North of Steep Hill Maidencombe	1.62	1.33	82.3
22	21P070	Land at Preston Down Road	7.37	3.95	53.59
23	21B040	Land to the South of Archery Field	6.71	4.96	73.95
24	21B048	Land at Broadsands	4.30	3.91	90.84
25	21B049a	Site at Greenway Road and Greenway Park	6.83	6.59	96.49
Further Additional Sites			126.03	72.39	57.44
Reg. 18 (as in Table 4)			206.26	103.40	50.13
Employment Land (as in Table 3)			25.70	16.00	62.57
Totals			**357.86**	**191.79**	**53.59**

Table 8: The HELAA Sites including Broad Locations + Employment Sites on Agricultural land

No.	HELAA Ref.	Identified Site	Site size (ha)	BMV (ha)	BMV %
Sites where post-1988 ALC survey data is available					
1	21T059	Land of Orchard Way, Torquay	2.75	1.07	38.91
2	21T064	Sladnor Park, Maidencombe	21.91	1.35	6.16
3	21T065	Land off Teignmouth Road, Maidencombe	1.55	1.55	100.00
4	21T111	Port Talland Farm, Maidencombe	3.18	3.18	100.00
5	21T122	Land at Hamelin Way and Moles Lane, Edginswell	35.05	10.03	28.62
6	21T143	Land south of Longpark Hill, Maidencombe	2.58	1.82	70.54
7	21T158	Land at Longpark Hill/ Stoke Road Maidencombe	2.80	1.39	49.64
8	23T002	Land at Nut Bush Lane	16.84	11.18	66.39
9	23T007	Land north of Brunel Manor	0.47	0.12	25.52
10	21P008	Land to the North of Totnes Road (Taylor Wimpey)	4.79	4.68	97.70
11	21P015	South of Totnes Rd, Collaton St Mary	15.08	5.88	38.99
12	21P053	Land at the Local Centre, White Rock	1.22	0.68	55.74
13	21P056	Land South of Totnes Rd, Collaton St Mary	7.79	1.08	13.86
14	21P059	Land at Paignton West	2.67	0.90	33.71
15	21P60	White Rock (housing)	2.16	1.89	87.50
16	21P062	Land NE of Long Meadow, Collaton St Mar	3.60	3.23	89.72
17	21P065	North of Lower Yalberton Holiday Park, Long Road	7.49	1.32	17.62
18	21P066	South of Lower Yalberton Holiday Park, Long Road	9.30	3.14	33.76
19	21P067	Land North of Lower Yalberton Holiday Park, Long Road	13.92	11.86	83.91

20	21P077	Western half of Taylor Wimpey Site, North of Totnes Road	2.66	2.66	100
21	21P079	Former Farmhouse, White Rock	0.80	0.10	12.50
22	22P001	Yalberton Hol Pk/Berry Acres 'Link'	4.91	3.10	63.14
23	21B002	Land to the south of Whiterock (Inglewood)	31.59	31.23	98.87
24	21B003	Land at Churston (Brokenbury)	8.03	5.16	64.26
25	21B015	Land at Monksbridge Road	10.12	5.05	49.9
26	21B017	Site north of New Road/south of Wayside	1.49	1.24	83.22
27	21B023	Site adjacent to Brokenbury	1.97	1.31	66.50
28	21B025	Copythorne Road	6.12	5.31	86.76
29	21B027	Mathill Road and Laywell Lane Brixham	1.22	0.64	52.46
30	21B030	Land south of Inglewood	42.00	20.45	48.69
31	21B033	Land NE of Laywell Road Brixham	1.43	1.32	92.31
32	21B034	Site at Churston Road	0.79	0.79	100.00
33	21B039	Land between the Inglewood development and the A3022 Brixham Road	6.98	6.98	100.00
34	21B041	Inglewood Phase 2	42.00	3.19	7.6
35	21B045	Churston Barony Broad Location	65.02	62.65	96.35
36	21B046	Lupton Park Estate to Monksbridge	157.27	33.17	21.09
37	21B051	Land to the east of Brokenbury Quarry Wastewater Treatment Works (WWTW)	1.30	0.90	69.23
38	21B053	Land at Green Lane/Bascombe Road	3.43	2.59	75.5
39	21B052	Triangle east of Bascombe Road, north of disused railway line, Churston	1.30	0.85	65.38
40	22BCG001	Land West of Ferrers Green	4.25	3.87	91.06
41	22BCG002	Land East of Ferrers Green	6.64	5.14	77.41
Sites where only semi-detailed 1985 ALC survey data is available					
42	21T017	Torquay Holiday Park	6.34	0.05	0.79
43	21T018	Land to the north of Nuthatch Drive	4.06	0.25	6.16
44	21T050a	Wider land at Broadley Drive, Livermead	16.69	1.63	9.77
45	21T056	Kingskerswell Fields A & B, Kingskerswell Road	1.08	1.08	100.00
46	21T110	Site of Step Hill, Maidencombe Cross	0.87	0.11	12.64
47	21T126	Land south of Longpark Hill, Maidencombe	1.87	0.51	27.27
48	21T128	Land off Montserrat Rise	0.80	0.21	26.25
49	21T129	Hatchcombe Lane AKA Land adjacent Beechfield Avenue	1.30	0.09	6.92
50	21T137	Stantor Barton	110.16	59.52	54.03
51	21T145	Land North of Bottompark Lane	2.55	0.60	23.53
52	21T152	Broad Location - Maidencombe Broad Location east of Teignmouth Road	47.42	2.94	6.21
53	21T153	Broad location - Maidencombe: Claddon Lane Cherry Blossom Farm	23.16	5.39	23.27
54	21T157	Land North of Steep Hill Maidencombe	1.62	1.33	82.1
55	21P001	Land off Brixham Road (Devonshire Park)	9.78	0.35	3.58
56	21P003	Land south of Yalberton Road (Berry Acres)	11.47	5.48	47.77
57	21P011	South of St Marys Park, Collaton St Mary	3.44	1.43	41.57

58	21P014	Site North of Luscombe Lane Great Parks	6.10	6.10	100.00
59	21P017	Land at Preston Down Road North	2.00	1.02	51.00
60	21P018	Land at Preston Down Road South	1.80	0.92	51.11
61	21P042	Land adjacent to Bona Vista Holiday Park, Totnes Road	4.18	1.13	27.03
62	21P043a	Land adjacent to Beechdown Farm Bungalow, Totnes Road (extended)	0.69	0.61	88.41
63	21P070	Land at Preston Down Road	7.37	3.96	53.73
64	21P071	Land at Falcon Park, Totnes Road, Paignton	8.30	0.77	9.28
65	21P072	West of Great Parks	15.50	2.73	17.61
66	21P078	Land North of Totnes Road (Bloors)	18.00	2.71	15.10
67	21P082	Land west of Kings Ash Road	2.10	1.69	80.5
68	21P083	Broad location: The Blagdons	322.49	80.13	24.85
69	21P084	Broad location: Langdon/Whitehill Holiday Camp	170.89	48.94	28.64
70	22BCG003	Elberry Farm, Broadsands	1.74	1.26	72.41
71	22BCG003a	Part Elberry Farm, Broadsands	4.72	3.75	79.45
72	23BCG002	Site NE of Alston Reservoir, Kennels Road	4.34	3.91	90.10
73	21B004	Land adjacent Kennels Road	9.67	9.54	98.66
74	21B005	Archery Field, Dartmouth Road	5.53	5.39	97.46
75	21B020	Chiseldown Farm	18.71	4.88	26.08
76	21B028	Lupton Park / Guzzle Down	38.30	4.95	12.92
77	21B035	Alston Lane/Brixham Road	1.46	1.34	91.78
78	21B036	Alston Lane	0.55	0.38	69.09
79	21B040	Land to the South of Archery Field	6.71	4.96	73.91
80	21B043	Land South of Centry Court, Centry Road	0.55	0.41	74.55
81	21B044	Broad Locations: Broadsands	9.32	4.79	51.39
82	21B047	South of St Marys Bay to Sharkham Point	36.02	16.91	46.95
83	21B048	Land at Broadsands	4.30	3.91	90.93
84	21B049	Site at Greenway Road and Greenway Park	1.90	1.67	87.89
85	21B049a	Site at Greenway Road and Greenway Park	6.85	6.60	96.35
86	21B050	Steam Fair site and surrounding SE of Kennels Road	87.62	64.19	73.26
HELAA sites			1597.06	634.57	39.73
Employment Land (as in Table 3)			25.57	16.00	62.57
Totals			**1622.63**	**650.57**	**40.10**

Table 9: Potential Allocation Scenarios - BMV Land Loss Performance

Scenario	Brownfield land (ha)	Total Agricultural Land (ha)	BMV Land (ha)	BMV % (Local Baseline 47%; National Baseline 42%)	BMV Loss pa (over 18 years) ha	Cumulative Loss (> /< 1% of 2,069ha pa)
Regulation 18 + Employment	97.18	231.83	119.40	51.50	6.63	0.32
Regulation 18+ Additional Promoted Sites+ Employment	97.65	248.07	129.76	52.31	7.21	0.35
Regulation 18 + Additional Pool Sites + Employment	108.65	357.86	191.71	53.59	10.66	0.51
HELAA + Employment	115.84	1622.63	650.57	40.10	36.14	1.75