

TORBAY LOCAL PLAN

A landscape for success

The Plan for Torbay – 2012 to 2032 and beyond

SUBMISSION PLAN

SCHEDULE OF CHANGES TO THE PROPOSED SUBMISSION PLAN (FEBRUARY 2014) SUGGESTED BY TORBAY COUNCIL FOR CONSIDERATION AT EXAMINATION

VOLUME 1: CHANGES BY ORGANISATION

Torbay Council - July 2014

Following publication of the Proposed Submission Plan on 24 February 2014, a number of representations were received during the subsequent formal consultation period, which ran for six weeks until 7 April. These representations covered a range of topics and issues relating both to general editorial and specific soundness matters. All representations have been registered and key points summarised (see Submission Document SD14 'Regulation 20 Statement – Publication of Proposed Submission Plan and representations made').

Subsequently, the Council has been working with its various partners and other interested parties to address the various representations received. To assist both the Examination Inspector and representors, Officers have now compiled a schedule of suggested changes to the content of the Proposed Submission Plan. These are set out in Submission Documents SD20 'Schedule of suggested Torbay Council changes for consideration at Examination [Volume 1: Changes by organisation]' and SD21 'Schedule of suggested Torbay Council changes for consideration at Examination [Volume 2: Changes by paragraph and policy number]'.

All suggested changes have been subject to further Sustainability Appraisal and, where appropriate, to Habitats Regulations Assessment. As a consequence, this schedule is also accompanied by schedules of suggested changes to both the SA and HRA (see Submission Documents SD22 'Schedule of suggested Torbay Council changes to February 2014 Sustainability Appraisal for consideration at Examination' and SD23 'Schedule of suggested Torbay Council changes to February 2014 Habitats Regulations Assessment for consideration at Examination'). Many of the suggested changes have been the subject of extensive negotiation with specific representors and in some cases have resulted from the commissioning of additional evidence base survey work (eg in response to comments by English Heritage and Natural England – see Submission Documents SD26 'Torbay Council response to representations by Natural England' and SD27 'Torbay Council response to representations by English Heritage').

This work is ongoing and may continue during the course of the Examination, in the context of advice from the Inspector. In the meantime, in the period preceding formal Submission, these schedules have been reviewed and supported by the Council's Director of Place and the Executive Member for Planning, Housing and Waste. However, they have not received full Member approval or any formal public consultation, two courses of action that would be inappropriate at this stage prior to Examination of the Proposed Submission Plan.

Essentially, the majority of suggested changes have been suggested by the Council's Officers in order to provide clarification or amplification of the Plan's existing supporting text and specific policies, as well as addressing omissions, typographical errors, superseded data, factual errors and inserting cross references.

It is the Council's view that these changes do not represent any significant shift in the planning policy framework for Torbay as set out in Submission Plan, nor do they in any way change the proposed level, location or direction of the proposed growth strategy. They therefore do not go to the 'heart', the core strategy, of the Plan and the Council remains of the view that the Plan as submitted is sound. It is considered that the suggested amendments do not amount to a scale and level of change that would render the current Proposed Submission Plan significantly different to the version published in February 2014, and to therefore necessitate further advertisement and consultation prior to Submission. Rather, the suggested amendments, which are broadly acceptable to officers, add value to the Plan by providing clarification and improvement of the proposed development framework.

Accordingly, the appointed Inspector is invited to consider the suggested changes set out in the four schedules referred to (Submission Documents SD20, SD21, SD22 and SD23) as part of formal deliberations on the soundness of the overall Plan. Where appropriate, this might also take place as part of the debate on specific key issues to be identified for debate during the Hearing session of the Examination. The Council would welcome the Inspector's advice on how to embrace the Council's submitted schedules in the Examination process, and would support any suggestion that they be the subject of public consultation towards the end of the Examination process, either on a free standing basis, or alongside or as part of any proposed Main Modifications should the Inspector consider that course of action to be necessary.

Torbay Local Plan- A landscape for success. The Plan for Torbay 2012-32 and beyond: Schedule of suggested Torbay Council Editorial Changes in response to Regulation 20 representations

Consultee ID	No.	Person/ Organisation	Policy No. (Object unless otherwise stated)	Comment	LPA Response/Editorial Modification suggested to address objection (Explanation changes shown as emboldened black text . Changes to policy shown as red emboldened text. The policy to which a change relates is shown bracketed ()).
-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
Partner organisations					
830126		Torbay Development Agency	Sup: SS1, SS5	Support Local Plan	Support noted/No modifications needed.
817459p ₁	P2	Heart of the South West Local Enterprise Partnership	Sup: SS1	Support overall approach and growth strategy set out in the Plan	Support noted/No modifications needed.
817400	P3	English Riviera Tourism Company	General Support Obj to TO1, TO2	Supports tourism policies in the Local Plan, Request minor change to mention “sustainable tourism” rather than green tourism and add reference to year round tourism at Policy TO1/ para 6.1.2.3. No objection to removal of Corbyn Apartments from Core Tourism Investment Area	Support noted Replace references to green tourism with sustainable tourism . (P16 and TO1). Refer to year round facilities at 6.1.2.3 of Explanation to TO1
843212	P4	Torbay Coast and Countryside Trust	General support. Object to SS7, SS8 and Implementation	General support. Minor amendments to SS8. Object that no reference is made in implementation section to green infrastructure.	Policy SS8.3 developer contributions or mitigation measures will (delete may) be required (see also Natural England’s comments). 4.4.7 (SS8): add In addition to national sites, Torbay has a network of locally important wildlife sites and corridors. These are shown on the Policies Map and are addressed by Policy NC1 Biodiversity and Geodiversity. Other policies in the Local Plan such as C4 “Trees, hedgerows and natural landscape features” are also relevant. 7.4.11 Refer to green infrastructure at (penultimate bullet point)
438366	P5	South Devon AONB Unit	General support. Object to SS 2.4 & SDB3.2, Policies Map	General support for the Plan: (SS8, SS9, C2,C3,C4,NC1,HE1) Support overall Plan.	SS8.1 delete first natural so that policy reads: conservation of the landscape... Table 5.14 (p85) (Wall Park): benefits from development of larger

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
			(amendments requested)	Minor amendment to SS8 (only harmful impacts need mitigation) SDB3.2 – general support, but object to wording re development of greenfield parts of Wall Park. Wording should be clarified, and Policy should seek to draw back development from the coast. The proposals map should draw back the development boundary from greenfield parts of the site.	area... including the enhancement and safeguarding of AONB and biodiversity features, particularly for greater horseshoe bats. 5.3.2.1 (SDB3): add sensitive locations...including drawing back development from the AONB in the most sensitive areas. 5.3.2.2 (SDB3): add at end of para ..., including flight paths of greater horseshoe bats. Consideration should be given to the long term integrity of habitats, flight paths and foraging areas, taking into account climate change management (see Policies NC1 and C3)
481214	P6	Torbay Local Access Forum	Object to: Aspiration 2/ 4.3.8	Overall support for the Local Plan. Minor amendment requested to refer to landscape and access impact of renewable energy generation.	Support welcomed. Environmental impacts of renewable energy are considered in ES2. It is unlikely that renewable energy proposals would have significant access issues that are not picked up elsewhere in the Plan (e.g. Policy SS6 or TA2)
Neighbouring District and County Councils					
468625	LA1	Devon County Council	Support; SS1, W1 ,W4 M2, M3	DCC support the Local Plan	Support noted
438382	LA2	South Hams District Council	General support Object to SS8, TA1,SS6,SS, SDP3, C1 (amendments requested).	Support overall thrust of Local Plan Request mention of AONB. Concern about SDP3, particularly A385 Totnes Road (request developer contributions towards A385 in South Hams) Request C1 is amended to refer to green wedges Part 7 and para 2.2.11 reword to make clear that there is not a "reserve of	General support noted. Make minor editorial changes as follows: At 4.4.3: add that the south of the Bay is within the South Hams AONB Para 4.3.17: reduce rat-running including through Marldon, Berry Pomeroy, Galampton and reduce further afield impacts. (C.f. Stoke Gabriel Parish Council). 5.2.2.8 (SDP3): at end of first sentence of add Masterplanning should consider cross boundary impacts on the neighbouring South Hams. At 6.3.1.2 second bullet point: add. .safeguard from further urban sprawl and maintain important green wedges. Para 2.2.11 after South Hams: add as part of an ongoing Duty to

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
				land" on South Hams	Cooperate to consider housing need and availability on a strategic basis by the local planning authorities in the area. P121: refer to Natural England not English Nature (editorial)
438373	LA3	Teignbridge District Council	Support for: SS1, SS6, SDT1, TA1,SS9	General support for the Local Plan	Support welcomed (note that comments at draft have been addressed).
National organisations					
494352	N1	Marine Management Organisation (MMO)	-	No Objections. Refer to role of MMO and Marine licences.	Already referred to at 6.1.27. Add cross reference to EIA and role of MMO at paragraph 6.3.1.21
415792	N2	Network Rail	General Support. Object to: SS6, C5 (minor amendments).	Support Devon Metro Scheme. Scheme includes Edginswell Halt, but not Kingskerswell Halt. Where development impacts on level crossings, S106 contributions are sought to carry out any required works. There are no plans to extend the network or increase services to London. 6.3.1.32- clarify that all rail must be built to defined standards	Overall support noted. Level crossings and S106 contributions are already mentioned at SS6.4 Retain aspirational text at 4.3.22 to extend network and increase service to London. Retain reference to Kingskerswell halt as this was requested by Teignbridge District Council. 6.3.1.32 (SS6): delete last sentence and replace with The Council will seek to minimise any impact on the ULPA, whilst recognizing that Network Rail's operational and safety standards must be met.
820819	N3	National Grid (Amec for)	SDT3 General comment	Development should not interfere with gas pipeline just north of the proposed future growth area.	Support noted. Add footnote to Table 5.5 that development should avoid high pressure gas pipeline to the north of Edginswell Future Growth Area.
843248	N4	Homes and Communities Agency	Support: H2, H3, SDT1, SDB1. General comment on H3	Support Local Plan, particularly affordable housing policy. Support self build policy- but need to show evidence of demand for self build. Support mixed use	Support noted. Add paragraph at 6.4.1.19 (H3) referring to evidence of demand for self build housing: In line with NPPF requirements, Torbay Council has made attempts to assess the demand for self-build housing within Torbay. An assessment from the Buildstore, the UK's leading supplier to the self build market, indicated a 'reasonable interest' in self build

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				regeneration in town centres.	within the Torbay area with significant numbers of their customers searching for self-build plots within a 25 mile radius of Torbay and also a significant number of members currently living within the Torbay area. In the first half of 2013 there were 121 active searches for self build opportunities within a 25 mile radius of Torbay. In addition, the Council has had discussions with a Community Interest Company called the Land Society, based in Torbay, who have carried out work to assess the demand for community self build housing in the area. Due to sufficient demand (e.g. 36 willing households are on the database for Brixham alone,), they are currently investigating the potential for schemes both within and outside Torbay.
843579	N5	English Heritage	Object to SS1, SS8,SS9, SS10, HE1, HE2,TO1,SDT2	Object that the Plan and SA give inadequate reference to historic environment. Not clear how growth option is achievable within built environment constraints. SHLAA sites (i.e. appendices) are not available so cannot assess whether growth strategy is appropriate.	<p>See more detailed assessment of English Heritage's Representation letters dated 13 November 2012 and 6th April 2014.</p> <p>Aspiration 3: refer to assets at risk in bullet point 1</p> <p>2.1.2 Paragraph 2.1.2 (third sentence) add historic to list of assets. First bullet point: add that enhances and realizes the economic potential of the historic environment.</p> <p>Add reference to conservation assets at 2.2.9: Torbay has a rich historic environment, with significant prehistoric, mediaeval, C18th and 19th assets.</p> <p>2.3.1 P16: add bullet on Protect and enhance a rich environment heading - Conserving and enhancing the built environment and seeking a high standard of design throughout the Bay and to capitalise on the economic and cultural opportunities that this offers.</p> <p>Refer to historic environment's value for tourism.</p> <p>4.1.32 (SS2): add text Masterplans have been prepared for Torquay Gateway, Great Parks Paignton, and Collaton St Mary, Paignton as well as Torquay and Paignton Town Centres. These are expected to inform Neighbourhood Plans. Alternatively, they may be further consulted on as Supplementary Planning Documents.</p> <p>Move and rename Policy HE1 as a Spatial Strategy (SS) policy.</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
					<p>Remove seek to in first line.</p> <p>4.4.8 (HE1): add paragraph to state: much landscape is manmade and there is an interrelationship between the historic and natural environment for example when considering hedgerows, field patterns and other naturalized features (see Policies HE1 (SS-) and C4.</p> <p>After 4.4.15 (SS9): add Country parks and other green infrastructure are often of historic importance, particularly Cockington and Berry Head, Brixham. Policy HE1 (SS-) is relevant to consideration of these historic assets.</p> <p>Add text at 6.3.3.11 (HE1) to refer to the Heritage Strategy: The Torbay Heritage Strategy was adopted in 2011. Its purpose is:</p> <ul style="list-style-type: none"> • to develop a strategy that will help maintain the local and community identity • to be mindful and respectful of the things that make Torbay a special place • to contribute to the quality of life for residents and the community • to initiate conservation-led regeneration to maintain geographical and historical character • to restore original and sentimental character to heritage assets • to encourage an already thriving tourist economy. <p>Policies SS8 and C3 which are relevant to natural features and naturalised manmade features (such as hedgerows, old buildings) of historic and landscape significance.</p> <p>6.3.3.17 (HE2): add text Torbay has 864 listed buildings, so it is likely that a significant number of proposals will arise in the Plan period affecting them. Many are also within conservation areas. Guidance on these and other matters such as Historic Parks and Gardens is set out in Policy HE1 (moved to SS-).</p> <p>6.1.1.3 (TC2): add explanation and cross reference to HE1 in text to TC1</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
					<p>at paragraph. All town centres contain historic elements, and Policy TC1, in conjunction with the area policies (SDT, SDP, SDT) and Policy HE1 seek to make use of the historic environment to add value to the economy</p> <p>4.1.11 and 4.1.21 (SS1): amend (Constraints due to)...open space designations, historic environment, and loss of holiday accommodation</p> <p>SDT1: add to main policy paragraph 2 - Proposals should conserve or enhance the historic built and natural environment.</p> <p>Policy SDT2: at end of first paragraph add whilst conserving or enhancing the area's historic character</p> <p>5.1.1.1 (SDT2): at end of para add The lower part of the town centre is conservation area, and development will complement the area's historic character.</p> <p>5.1.2.2 (SDT3): refer to the importance of protecting Edginswell Hall.</p> <p>5.1.2 (SDT1) and after 5.2.2 (SDP1) and 5.3.2 (SDB1): add Regard should be had to the conservation or enhancement of the built, natural and historic environment, particularly within conservation areas, in accordance with other policies in this Plan.</p> <p>Clarify at 6.3.1.8 (C1) that landscapes are of great visual and historic importance.</p> <p>Policy TO3: add environmental, historic environment, biodiversity... Revise TO3 to state :The following schemes are proposed will be investigated (c.f. Natural England's comments).</p> <p>Add paragraph after 6.1.2.29 (TO3): Torbay has an important maritime history and all three harbours are within conservation areas. Policy HE1 is relevant when considering historic assets.</p> <p>Glossary: add Heritage Asset and Historic Environment</p> <p>Heritage Asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting</p>

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					<p>consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).</p> <p>Historic Environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed.</p>
400188	N6	Natural England	Object to SS1, SS2, SDT1, SDT2, SDT3, SDP1-4, SDB1-3, SS2, Ss11, TO1, TO3, C1, NC1, SS8, SS6, W5, SA, HRA	Object that Plan does not meet HRA requirements. Plan is too dependent on “down the line” assessments. Need to clarify what constraints considered by SHLAA and HRA. Waste water polices should safeguard bathing water quality. Marine economy policies should consider effect on marine conservation and cSAC/ Conservation Zone. See More detailed summary/response on HRA/SA comments.	<p>Discussions and additional habitats assessment work is going on to seek to resolve NE’s objections. A Paper setting out the Local Plan’s growth rationale and site selection process (based on the SHLAA etc) has been prepared.</p> <p>The Council commissioned Kestrel Wildlife to carry out an HRA Site Appraisal of the Torbay Local Plan Strategic Delivery Areas (Kestrel Wildlife 2014). A number of changes are recommended in response to this report.</p> <p>Policy SS1 After premier resort in paragraph 2, add: All development should safeguard the area’s natural and built environment and in particular the safeguarding and mitigation of greater horseshoe bats and other protected species and their habitats.</p> <p>Delete existing 4.1.20 and replace with: Torbay has significant environmental constraints, including being within the flight paths and foraging zone of the South Hams Special Area of Conservation. The Habitats Regulations Site Appraisal Report of the Torbay Local Plan (Kestrel Wildlife 2014) identifies a number of mitigations measures for safeguarding the integrity of the SAC. The greater horseshoe bat mitigation strategy should be implemented within development areas. Further details are set out in Policy NC1 and the Strategic Delivery (“SD”) policies of this Plan. This includes maintenance of darkened corridors to maintain flight paths, and the use of developer contributions to manage increased recreational pressures.</p> <p>Existing Commitments, second sentence “Most of this growth...</p>

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					<p>Amendments to SS1, SS2, SS8, NC1, C1 to reflect guidance on GHBs. Also minor amendments to SD policies</p> <p>Policy SS2: Amend third Paragraph: A bespoke Greater Horseshoe Bat (GHB) mitigation plan for all development within the Future Growth Areas must be submitted and approved before planning permission will be granted. The plan must demonstrate how the site will be developed in order to sustain an adequate area of non-developed land as a functional part of the local foraging area and flyway used by commuting GHBs associated with the South Hams SAC. The mitigation plan must demonstrate that development will have no adverse effect on the SAC alone or in combination with other plans or projects developments. Development should have regard to Policy NC1 concerning and the need scope for developer contributions to mitigate the impact of increased recreational pressure on the South Hams SAC</p> <p>Fourth Paragraph, add point: (viii) Integrated Green Infrastructure rich in biodiversity to be enjoyed by local people Add to last paragraph: development plan document and has first been subject to Habitat Regulations Assessment that has concluded there will be no likely significant effect on the South Hams SAC. Such....</p> <p>After paragraph 4.1.32 add: Greater horseshoe bat Mitigation strategy for the four Future Growth Areas should be implemented as recommended by the HRA Site Appraisal Report of Torbay Local Plan Strategic Delivery Areas (Proposed Submission Plan) 2014</p> <p>Policy SS8: Revise policy as follows -</p> <p>The Council will seek to safeguard, conserve and enhance the valued qualities, features and attributes of sites protected under European legislation and other important natural landscape, including tranquillity, dark night skies, bathing waters, biodiversity and geodiversity commensurate with their importance. It will ensure that:</p> <p>1 (new point) Sites, species and habitats protected under European, or equivalent, legislation will be protected from development. Development, around the edge of the built up area will be required to protect and manage wildlife and habitats,</p>

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					<p>including corridors between them, in accordance with Policy NC1. Particular attention must be paid to greater horseshoe bat flight paths, and ciril buntings.</p> <p>2 (former 1) Delete “natural” before landscape in Line 2</p> <p>3 (former 2) add to end of point: or nearby AONB or other valued landscapes such as country parks.</p> <p>4 (former 3) amend: ... dark corridors and amenity open spaces, ..., developer contributions and mitigation measures will may be required to improve management or enhancement of the natural environment with a goal of achieving a net gain in biodiversity</p> <p>4.4.7 Add cross reference to Policy NC1</p> <p>4.3.23 (SS6): add ,such works should have regard to the requirements of the Habitats Regulations and be acceptable in terms of the Candidate SAC and Marine Conservation Zone.</p> <p>SS11, TO1, C1 Add “increased” before recreational pressure: Development should have regard to Policy NC1 concerning the need for developer contributions to mitigate the impact of increased recreational pressure on the South Hams SAC</p> <p>SDT1: at end of third paragraph add priority species such as bats and ciril buntings and their habitats will be safeguarded.</p> <p>SDT3: Paragraph 3 Amend: Any proposals that may lead to significant effects on sites protected under European Legislation, including bats and ciril buntings will only be permitted where no adverse effects on the integrity of the site can be shown.</p> <p>Add text after paragraph 3:</p> <p>Any detailed proposals for development in the area should first be informed by appropriate bat surveys undertaken during a suitable time of year. Any biodiversity impact from development should be offset. Particular attention should ber given to for loss of grassland (foraging) habitat and internal hedgerows. A buffer of darkened hedgerow should be provided and maintained, particularly along</p>

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					<p>the western buffer, in accordance with Policy NC1.</p> <p>SDP1: at end of paragraph 4 add Priority species such as bats and cirl buntings and their habitats will be safeguarded and any impacts mitigated.</p> <p>Add text after 5.2.5: Greater horseshoe bat mitigation objectives for SDP3 and SDP4 Strategic Delivery Areas should be implemented according to the recommendations of the HRA Site Appraisal Report of Torbay Local Plan Strategic Delivery Areas (Proposed Submission Plan) 2014.</p> <p>SDP3: Paragraph 4 After South Hams SAC add as well as other species such as cirl buntings</p> <p>Paragraph 4 add to end of paragraph: A greater horseshoe bat mitigation objectives for Great Parks, Collaton St Mary Future Growth Area, Yalberton Industrial Estate, Claylands and Brixham Road, should be implemented as recommended by the HRA Site Appraisal Report of Torbay Local Plan Strategic Delivery Areas (Proposed Submission Plan) 2014.</p> <p>5.3.2.2 (SDB3: refer to maintaining flightpaths of GHBs and long term integrity of habitats (see AONB Partnership's comments above).</p> <p>Policy SDP4 add at end of paragraph 2: Development of the area should:</p> <ol style="list-style-type: none"> 1) Provide and maintain landscape buffers between development and areas of semi-natural vegetation in the valley, in accordance with Policy NC1. 2) Minimise light spill, particulatly where this would interfere with greater horseshoe bat habitats or flight paths. 3) Mitigate for the loss of potential foraging and commuting habitat to ensure retention of connectivity along the valley; retention, where appropriate, of features through development that are likely to be used by greater horseshoe bats. Developer contributions will be sought towards the provision of bespoke purpose-built roosts in appropriate locations along the valley.

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					<p>SDB1: second paragraph after Greater Horseshoe Bat add and cirl buntings can be addressed safeguarded.</p> <p>Add after “addressed” in penultimate line of Policy SDB1: A Greater horseshoe bat mitigation objectives for Fishcombe Cove and Wall Park Future Growth Area should be implemented as recommended by the HRA Site Appraisal Report of Torbay Local Plan Strategic Delivery Areas (Proposed Submission Plan) 2014</p> <p>SDB3 Add after South Hams SAC in second paragraph: “...Adequate mitigations should be provided, in accordance with the HRA Site Appraisal Report (2014), that ensure:</p> <p>(i) there are no further restrictions on potential movement of GHBs along the strategic flyway through the future growth area; and</p> <p>(ii) the retention and enhancement of foraging and on-site roosting opportunities.</p> <p>Add a new paragraph after 5.3.2.1: “The Recreational Impacts on Berry Head - additional HRA work for the Torbay Local Plan by Footprint Ecology (2014), has confirmed that the level of growth proposed by the Local Plan would increase the recreational pressure on Berry Head component of South Hams SAC. The evidence has also recommended a number of mitigation measures. These measures need to be implemented to ensure the integrity of the SAC is not compromised as a result of increases in recreational pressure.</p> <ul style="list-style-type: none"> (i) the development of a detailed management plan addressing habitat management and visitor use; (ii) habitat management required to increase the resilience of the site over and above that already required to maintain the interest features of the site; (iii) increased visitor engagement work; (iv) management work at Sharkham Point to provide an alternative location for dog-walkers if visitor work suggests this may be effective.”

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
					<p>Policy C1: amend last paragraph as follows:</p> <p>Where new development proposals come forward, the Council will also have regard to the need to protect, conserve or enhance the distinctive landscape characteristics and visual quality of a particular location, as identified in the Torbay Landscape Character Area Assessment, the suitability of development and the capacity of the countryside to accommodate change. Development in the countryside should not have adverse effect on the integrity of the South Hams SAC or other important habitats. It should also have regard to Policy NC1 to assess the ‘in combination’ effects of multiple developments that could affect greater horseshoe bats and the integrity of the South Hams SAC and the scope for developer contributions to mitigate the impact of recreational pressure on the South Hams SAC.</p> <p>6.3.1.(C1): add after appropriate in penultimate line: and reflected in the choice of lighting solutions to minimise the impact of light pollution, particularly on greater horseshoe bats (see policy SS8) and other wildlife</p> <p>Policy NC1: amend Policy as follows: Para 1 and 2 no change.</p> <p>Para 3 replace with: Development around the edge of the built up area will be required to provide:</p> <ol style="list-style-type: none"> 1. A belt of ‘linear features’ and ‘stepping stones’ necessary to maintain the Torbay population of greater horseshoe bats in ‘favourable conservation status’. 2. To do this, development likely to have a significant effect on the integrity of the South Hams SAC will be required to provide biodiversity conservation measures that contribute to the overall enhancement of this ‘favourable buffer’ for GHBs in Torbay (see Figure 6.X). Such measures should be based on

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
					<p>the following principles:</p> <ul style="list-style-type: none"> • The maintenance of GHB habitat connectivity across the landscape; • The provision of adequate foraging habitat; • The provision, where appropriate, of adequate permeability through built development following existing and new flight paths; • The provision of new bespoke roosts where they will provide 'stepping stones' across the landscape. <p>Developer contributions will be sought towards assessing in combination' effects of multiple developments that could affect the bats and the integrity of the South Hams SAC, and for mitigation measures needed to manage increased recreational pressure on the South Hams SAC resulting from increased housing numbers.</p> <p>Para 3 Amend as follows: Development likely to cause harm such sites or species that cannot be mitigated as above will therefore only be permitted where there is an overriding public interest considered to outweigh the impact(s) on nature conservation, where a thorough assessment of impacts (both individually and in combination with other developments) has been undertaken, and where consideration has been given to reasonable alternative sites for development.</p> <p>In the circumstances where there is an overriding public interest that renders development acceptable, schemes should minimise damage to nature conservation interests and provide appropriate mitigation, compensation and/or enhancement to achieve a net gain for biodiversity. If significant harm cannot be avoided, planning permission will be refused.</p> <p>Para 4 No change</p> <p>Para 5 Development should not result in the loss or deterioration of</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
					<p>irreplaceable habitats or corridors. Where development in sensitive locations cannot be located elsewhere, the biodiversity and geodiversity of areas will be conserved and enhanced through planning conditions or obligations. Development proposals should minimise fragmentation, and maximise opportunities for the restoration and enhancement of natural habitats, including trees and ancient woodlands. The integrity of wildlife corridors and important features shown in the Torbay Green Infrastructure Delivery Plan should be preserved conserved and enhanced.</p> <p>Para 6 All developments should positively incorporate and promote biodiversity features, proportionate to their scale. Where there is an identified residual impact on biodiversity, proposals will be expected to deliver a net gain in biodiversity through the creation or provision and management of new or existing habitats, in accordance with the Torbay Biodiversity and Geodiversity Action Plan and the Torbay Green Infrastructure Delivery Plan. If avoidance and mitigation are not sufficient, residual impacts must be offset compensated in a manner deemed acceptable by the Council.</p> <p>Revise TO3 to state: The following schemes are proposed will be investigated</p> <p>6.1.2.27 (TO3): after seabed add reefs and seacaves.</p> <p>6.1.2.28 (TO3): add at start of paragraph Projects are promoted subject to their acceptability in terms of environmental impact from physical impacts, contamination, and nontoxic changes (e.g. to salinity, turbulence nutrients, organic matter etc), as well as minimizing the impacts on main wildlife e.g. through piling, noise or other disturbance. Under the Conservation of Habitats and Species Regulations 2010 (as amended), a licence may be required to carry out works affecting marine mammals or their habitats.</p> <p>W5 paragraph 3: add “Natural England or Environment Agency”</p> <p>In criterion 1: Waste water treatment works or other sewerage infrastructure serving these developments have insufficient capacity to accommodate development without increasing the risk of overflows</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
					of untreated sewage into the environment; or 6.5.3.27 (W5): add to end of para It is important that water quality of the Marine Candidate Special Area of Conservation is not harmed by pollutants or outfall in storm events. Natural England is the advisory body with responsibility for such matters.
843583 N7		Environment Agency	Object to: SS3,SS4,SS8,SS13,SPD3,C3,ER1,W5 (Amendments requested)	Overall support. Minor technical amendments requested re flooding etc. Refer to economic benefits of a good environment.	Overall support noted. Aspiration 3: add (after landscape area), improve river corridors, open spaces and natural areas . Last bullet point add “and eco tourism value” . Aspiration 5 (bullet 5): add by incorporating climate change factors such as run-off, sea level rise, increased storminess and unpredictable weather . Bullet 6 add over the lifetime of development 4.1.36 (SS3): add It will be noted that footnote 9 of the NPPF indicates that some matters such as AONB, habitats Regulations, flooding and coastal erosion and designated heritage assets may outweigh the presumption in favour of sustainable development. (See also responses to Natural England’s comments). 4.2.15 (SS4): add bullet Sustainable tourism and environmental “green collar” employment SS8 after dark night skies, add bathing waters (see also responses to Natural England’s comments). 4.4.7 (SS8): add to end of Paragraph High quality bathing waters are an important asset both for ecology and tourism in Torbay. The Bathing Waters Directive requires that the quality of sea water be improved. Policies ERR2, ER3 and W5 seek to minimise the impact of wastewater upon bathing water qualities, for example by removing existing and restricting new surface water connections to combined sewers. (See also responses to Natural England’s comments). 4.6.17(SS13): add It can also boost Torbay’s green economy.

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
					<p>5.2.2.7 (SDP3): add after Great Parks Country Park which should be landscaped and designed to offer flood risk benefits.</p> <p>Policy C3.3: add after costal locations or inhibit the ability to access, maintain and/or improve existing sea defence or coastal management assets.</p> <p>Policy C4 (see also English Heritage and Churston, Galmpton and Brixham CP) Line 3: add historic after conservation. Start of paragraph 2: add Development proposals should seek to retain and protect existing hedgerows, trees and natural landscape features wherever possible, particularly where they serve an important biodiversity role</p> <p>6.3.1.24 (C4): add Established hedges have substantially more historic and environmental value than new hedges, which take time to mature and do not reflect historic enclosure patterns. Therefore existing hedges etc should be retained wherever possible. This is particularly important where they form part of the greater Horseshoe Bat corridors identified in Policy SS8</p> <p>Policy DE2 Add criteria 6. No net additional surface water should drain into shared sewers.</p> <p>Paragraph 6.4.2.30 add: The impact of “urban creep” (i.e. building over gardens etc) is identified by the Torbay Hydraulic Modelling of sewer Capacity study (AECOM 2014) is identified as having a greater impact on sewer capacity than the effect of new greenfield development. Accordingly measures to minimise surface water running into shared sewers will be sought. This could include permeable surfaces, increased planting, water butts, as well as promoting water efficiency measures in the home. See also Policy ER2 Water Management. (N.B: Amendment made in response to findings of Hydraulic Modelling (AECOM 2014).</p> <p>ER1 para 2: amend slightly to say would not increase the risk of flooding to third parties.</p> <p>ER1: amend third paragraph after first sentence - A flood risk</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
					<p>assessment will also be required for development close to sea frontages within Flood Zone 1 where there may be a risk of flooding due to wave action Development of basement accommodation, including changes of use or basement parking...(as existing)</p> <p>6.5.2.3 (ER1): add It is important to note that coastal frontages may be at risk of flooding from wave action, event where they are mapped as Flood Zone 1. This must be recognized in planning for such areas.</p> <p>6.5.2.6 and 6.5.2.12 (ER1): Replace reference to Technical Guidance to NPPF to Planning Practice Guidance.</p> <p>6.5.12.13 (ER1): delete last sentence and replace with The catchments within Torbay are typically small, steep, and in the most part highly developed in nature. There is also a legacy of culverting (piping) of the watercourse channels which adds to the risk of flooding and as such all new development must deliver a reduction in current rainfall runoff rates. This requirement also applies to Brownfield sites that will have to match the same standards. All off site surface water discharges from new development should mimic Greenfield performance up to a maximum 1 in 10 year discharge. On site, all surface water should be safely managed in conditions up to the 1 in 100 event plus an allowance for climate change. To satisfy the above will require additional water storage areas to be created within the site compared to the normal SUDS design thereby contributing to a reduction in flooding downstream.</p> <p>6.5.2.18 (ER2) end of para: add The Council will seek to use development to bring about improvements to bathing waters and marine habitats through the design of development and off site contributions where appropriate.</p> <p>W5 Para 3: add South West Water, Natural England or the Environment Agency object that:</p> <ol style="list-style-type: none"> 1. Waste water treatment works or other sewerage infrastructure serving these developments have insufficient capacity to accommodate development without increasing the risk of overflows of untreated sewage into the environment; or <p>6.5.3.27 (W5): add at end of para infrastructure, possible overflows</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
					<p>of untreated sewage into the water environment and impact on bathing water quality, all planning applications should be supported by details of how the proposed development will be drained and waste water dealt with. Details should be proportionate to the scale of the proposal. (See also Natural England and Environment Agency's comments).</p> <p>6.5.28 (W5) at end of para: add The Council will seek to ensure no deterioration to and preferably an improvement of bathing waters and marine habitats.</p>
417366	N8	South West Water (Martyn Dunn)	-	No comments	
425628	N9	Devon and Cornwall Police Architectural Liaison Officer	Object to: DE1, SS10 (Amendments requested).	Object that the Plan does not mention designing out crime and role of ALO. Amendments requested: matters that are likely to be resolved through editorial amendment.	<p>2.3.1 Add bullet point at p16 (under sustainable communities):</p> <ul style="list-style-type: none"> Seek to minimise crime, fear of crime, disorder and antisocial behavior through appropriate design, management and location of development. <p>SS10. Point 5: add ...whilst designing out opportunities for crime, antisocial behaviour, disorder and community conflict.</p> <p>4.5.30 (SS10): add Planning should create safe and accessible environments where crime and the fear of crime do not undermine quality of life or community cohesion (NPPF para 58 refers). The Police Architectural Liaison Officer (ALO) will provide advice and recommendations on designing out opportunities for crime, disorder, antisocial behaviour and community conflict in the built environment. In addition to design, the location and management of development are relevant. In appropriate cases the Council will work with the Police ALO to assess the potential crime (etc) impact of development and, where impacts can be mitigated, necessary management or mitigation measures (see also Policy TC5 Evening and nighttime economy and DE1 Design).</p> <p>DE1 End of first para: add whilst designing out opportunities for crime and disorder</p> <p>Design Consideration 4: add Design should also minimise opportunities for community conflict, anti-social behavior and maximise safety for all.</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
					6.4.2.4 (DE1): add text Section 17 of the Crime and Disorder Act makes a legal duty for planning to consider crime prevention. Consideration should be given in the location, design, and management of development to preventing crime, disorder, community conflict and antisocial behavior. Such matters should be addressed in design and access statements. The Council will work with the Police Architectural Liaison Officer (ALO) to minimise crime, disorder antisocial behaviour and conflict.
501495	N10	Sport England	Object to SC2. General comments on: SC1,SS2 SS10 C2,DE1	Generally support the Local Plan. Need to update evidence base with Sports Facilities Strategy and Playing Pitch strategy (underway). Design Policy DE1 should incorporate Active Design.	4.1.36 (SS3) add note to explanation that presumption in favour of sustainable development does not apply in all instances. SC2: amend criteria in last para of SC2 to bring in line with NPPF para 74 1) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or 2) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or 3) the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. 6.4.3.10 (SC2) Update text on Sports Facilities and Playing Pitch Strategy. DE1: add criterion in Quality of Open Space: Provide Opportunities for active lifestyles including walking and cycling (“Active Design”) 6.4.3.5 (DE1): add Guidance on “Active Design” is available from Sport England.
843591	N11	CPRE Devon	Object to: SS1, SS10, SS4, SS11 SS12, C1, C2, SDT3, SDP3, SDB1,SS12, ER1.	Object that the level of growth in Torbay is too high, and plan is not employment led. Reinstate AGLV at Torquay Gateway and Collaton St Mary and Westerland Valley. Reduce growth level in	Objections to Level of Growth and jobs led approach need to be considered at Examination – see also Paignton Neighbourhood Forum for amendments made referring to five year review. 4.5.32 (SS10) – revise to note that programme of bringing empty homes back into use should go beyond 5 years.

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				Brixham. Make Countryside policies more resistant to greenfield development, including reinstating AGLV. Do not support any development in food risk areas.	
400123	N12	The Theatres Trust	Object to: TO1,TC3, TC5, SC1.	Object that no reference/policy is made to safeguarding theatres and other cultural facilities.	6.1.1.1 (TO1) - add reference to theatres Explanation to TC5 - add after second sentence of 6.1.1.20 (TC5): For example the Plan supports the provision and enhancement of cultural facilities such as theatres, art galleries etc.
843602	N13	The Woodland Trust	Object to: SS9, DE1, DE3, SS7,SS9.	Support Plan in principle, but request amendments to strengthen protection of trees and woodland.	N.B Policy C4 already provides protection for trees and hedgerows. Policy SS9: add criterion F) Maintain existing and contribute to new tree planting and woodland creation. DE1 Design Considerations for development Point no 8: add including tree and hedgerow planting and habitat creation. 7.5.14 Monitoring and review – Add in after biodiversity impacts: including mitigation and monitoring including BAP Habitats proposed, created, restored and managed.
468952	N14	RSPB	(Late rep received 23/7/2014). Object to: SS8,NC1, 6.1.2.27 (TO3), SDT3, TO1	SS8 Object. Needs a broader focus for other environmental receptors (not just AONB and landscape). More information on target habitat and species in Torbay should be provided. NC1 – Object. Reference to nature conservation as a ‘public good’ suggested. Details of mitigation measures for Cirl Buntings needed (off-site	See changes in response to Natural England. Policy SS8 Point 3 (former 2) Development proposals outside the AONB will be supported where they conserve or enhance the distinctive landscape character and biodiversity of Torbay... 4.4.6, add to end of paragraph: Regard should be had to the Nature of Torbay – a Local Biodiversity and Geodiversity Action Plan 2006-16 in respect of all target habitats and species in Torbay. 4.4.7 Second sentence amend: The Council will require no overall detriment and seek net gains in the natural environment as a desirable outcome in accordance with paragraphs 9 and 117 of the NPPF Policy NC1 (see changes to NC1 in response to Natural England. Additional changes:

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
				<p>compensation). Lack of detail and ability to enforce on biodiversity offsetting. More emphasis on bat roosting boxes (1 box per dwelling requested).</p> <p>SDT3 – Object. Need more detail on off-site compensation for Cirl Buntings specifically within the Torquay Gateway.</p> <p>TO1 – Object. Recognise that any increased water activity should avoid disturbance to the SSSI at Berry Head.</p> <p>6.1.2.27 (TO3) – Object to wording of paragraph as it indicates ‘proposals can proceed so long as compensatory measures are sought’ which fails to reflect fundamentals of nature conservation. Recommend ‘overriding public interest’ test should apply.</p>	<p>3. Development that risks harm to cirl bunting habitats and territories will be expected to provide on site mitigation. Where on site mitigation is not practicable, provision for off site mitigation should be made.</p> <p>Developer contributions will be sought towards assessing in combination’ effects of multiple developments that could affect the bats biodiversity and the integrity of the South Hams SAC, and for mitigation measures needed to manage increased recreational pressure on the South Hams SAC resulting from increased housing numbers.</p> <p>6.3.2.5 Add new paragraph at end of 6.3.2.5: The Torbay Biodiversity Action Plan 2006-2016, “The nature of Torbay” sets out key objectives and actions for protecting and enhancing priority habitats and species. Regard should be had to these when considering biodiversity offsetting. Supplementary Planning Guidance will be produced to set out how biodiversity offsetting will operate, and where appropriate how planning contributions towards biodiversity will be used.</p> <p>6.3.2.10 The Council supports the RSPB’s aspiration for an average provision of 1 new bird or bat box per new dwelling. Supplementary guidance will be produced on maximizing opportunities for wildlife features in design and landscaping.</p> <p>Policy SDT3 (see also changes in response to Natural England) Add text after paragraph 3:</p> <p>Any detailed proposals for development in the area should first be informed by appropriate bat and cirl bunting surveys undertaken during a suitable time of year. Any biodiversity impact from development should be offset. Particular attention should be given to for loss of grassland (foraging) habitat and internal hedgerows. A buffer of darkened hedgerow should be provided and maintained, particularly along the western buffer, in accordance with Policy NC1.</p> <p>Paragraph 6.1.2.6 add: It should not be inferred that all areas within CTIAs are either suitable or proposed for development. For example</p>

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					they contain Babbacombe Downs, and the lakes at Clennon Valley, and coast near to Berry Head , where a significant emphasis will be on conservation of the environment....” Para 6.1.2.27: Amend second sentence to: Where harm cannot be avoided by a proposal, and the public benefit it generates overrides the ecological impact, appropriate compensatory measures should will be sought.
Neighbourhood Forums, Community Partnerships, Neighbouring Parishes and Amenity Societies					
704914	F1	Paignton Neighbourhood Forum	Object to: SS1,SS2,SS8,SS9, SS11, SDP1, SDP2, SDP3, H1, H4,TC1, TC2, TC3, TA3 C1,C2, C4, HE1, DE3, SC2, ER1,W5, Policies Map	Growth Strategy/Housing/Employment: Detailed assessment of demographic projections (falling migration rates etc) arguing that objective assessed need is around 150-200 dpa/3-4,000 dwellings over the Plan period. Torbay’s capacity is argued to be 8,100 dwellings (beyond Plan period), and allowance for bringing empty homes into use should be a long term commitment. Local Plan does not need to identify sites beyond year 10/15. Phasing policy should reinstate “lock gate” including truly jobs led mechanism. This can include growth rates dropping if need falls. Need a statement indicating where former policies are replaced by new Local Plan.	Paignton Neighbourhood Forum has set out a wide range of objections related to growth levels and relationship between the Local and Neighbourhood Plan, as well as objecting to the deletion of AGLV. These will need to be interrogated fully at Local Plan Examination. In addition to these, a number of editorial amendments are suggested to address other issues raised as follows: 1.1.3 Delete “ growth trend will be upward particularly after 2018 when the market is expected to improve ” (the market is already improving!) Replace with: but the local plan seeks to set out a sustainable strategy that accommodates needs within environmental and infrastructural limits. 1.1.5 Amend last sentence: The Local Plan’s strategy will be subject to major five year reviews, where evidence of the need for development and the bay’s capacity to accommodate it will be reassessed. Para 1.1.8 Line 7: replace “we know” with the Council has assessed Para 1.1.15 third sentence: add after A basket of measures will be assessed and used to determine whether the Local plan’s growth strategy remains supported by evidence of need and capacity. It will consider... (Whether additional land is needed...) Para 2.2.5: after first sentence add Progress towards creating jobs and improving the local economy will be assessed as part of the Local Plan review. At 2.2.11: add South Hams as part of an ongoing duty to cooperate to consider housing need and sustainability on a cross boundary

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
				<p>Local Plan should emphasize that growth areas etc are not site allocations- these will be allocated through NPs (should be designated as Countryside Zone). The Neighbourhood Plan is the appropriate plan to bring forward specific sites.</p> <p>Countryside/landscape: Area of Great Landscape Value (AGLV) should be reinstated (removal not justified by NPPF para 109): should cover Collaton St Mary, Westerland valley and Yalberton Valley. Object to allocation of further greenfield sites at Preston Down Road, Collaton St Mary. Make Policy C1 stronger. Reinstated ULPA at Queens Park. Amend DE3 to indicate that lower densities may be appropriate in rural areas. Town Centres strengthen town centre first policy in TC1. Object to designation of the Willows as a district centre- operates as an out of town centre. Reduce threshold for impact test to 500 sq m in TC3 Transport – make provision for white</p>	<p>basis by the LPAs in the area. After “This reserve will only be drawn on when demand shows it is needed”, add having regard to the most up to date evidence of objectively assessed need (c.f. SHDC’s comments)</p> <p>2.2.13 Note that these statistics will need to be refreshed as an editorial matter when the Plan is published. - update 2012 Population projections (11,000 people over 2012-32: 2600 over the next five years(2015-2019) Note that Torbay’s population growth is driven by (domestic migration.</p> <p>2.3.1 Add Westerland Valley for nature conservation.</p> <p>Aspiration 1 New bullet point To ensure a balanced provision of housing and employment</p> <p>SS2 Para 4: Development will be expected to deliver the following...</p> <p>Policy SS8: Remove seek to from first line.</p> <p>Para 4.4.13 and 4.4.15 (SS9): add reference to Yalberton Valley as part of cross boundary GI.</p> <p>4.5.12 Revise 4.5.12: Evidence of Torbay’s housing need (delete “requirement”) will be kept under review, particularly as population and household projections are regularly refreshed (see Section 7.5 below). The current evidence is set out in: ...add 2014 Household projections.</p> <p>4.5.13: add The 2012 (published 2014) based population projections indicate a population increase of 11,000 people between 2012-32, which is a third lower than the 2011 based figure. Analysis of the projections shows that they are dependent upon high migration rates. Bullet 1: add ONS projections have been adjusted downwards over the past 10 years. Bullet 3: replace “Household sizes are falling” with Household sizes did not fall between 2001-11, but may fall in the future, but any fall is likely to be less fast than...</p> <p>4.5.25: add either upwards or downwards</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
				<p>vans/commercial vehicles in residential development to accommodate Live/Work.</p> <p>Conservation Area- propose new conservation area at Yalberton Valley.</p> <p>HMOs- strengthen HMO Policy and implement Article 4 Direction.</p> <p>Sports/recreation – strengthen policy presumption against loss of sports facilities (c.f. NPPF 74).</p> <p>Flooding/Sewerage: limited capacity of Victorian shared sewers is a constraint on growth. Full details of flood/sewerage alleviation measures should be required before determining a planning application- cannot be left to conditions.</p> <p>Large number of editorial amendment /wording clarifications requested to bring the Local plan into line with strategic objections made above. Support for a significant number of policies.</p>	<p>4.5.32 (SS10): delete “over the next 5 years”</p> <p>4.5.34 (SS11): delete existing para after second sentence and replace with: The Council believes that the delivery of 8,000-10,000 new homes meets the demographically implied provision in the 2012 based population projections and household projections derived there from, with an allowance for economic prosperity and meeting a backlog of need from hidden households.and a major review of the Plan will take place on a 5 yearly basis.</p> <p>SS12: replace “trajectory” with requirement ((technical editorial matter).</p> <p>4.5.38 (SS12) end of first sentence: add “insofar as consistent with other policies in the NPPF”.</p> <p>After 4.5.41(SS12): add as noted above, and in Section7.5, the Local Plan will be reviewed on a 5 yearly basis, which may result in the 5 yearly requirements being adjusted.</p> <p>TC3 (D)1: reduce retail impact test threshold trigger from 1,000sq m to 500sq m</p> <p>6.1.1.11 (TC3) add: The Torbay Retail Study Update (GVA 2013) recommends that out of centre proposals of more than 500sq m of convenience or comparison retail floorspace should be accompanied by a retail impact assessment.</p> <p>TA3 - after car add commercial vehicle</p> <p>(However it is not considered appropriate to add a “lorry/van parking” requirement to residential developments and therefore no change to Parking Standards at Appendix G).</p> <p>Para 6.3.1.22 (C4): delete “can” from first line.</p> <p>Policy H4. Editorial correction. Add after first line: Applications for new buildings or sub-division of existing buildings into non-self contained residential accommodation (HMOs) will only be permitted where the following criteria are met:</p> <p>6.4.2.19 (DE3) End of paragraph: add However in some instances</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
					<p>landscape or ecology considerations may dictate lower densities.</p> <p>6.5.2.17 (ER1) - add text before last sentence: Full details of the measures that will be used to address flood risk will be required at the time a planning application is submitted for developments other than minor developments as defined by the Planning Practice Guidance (broadly commercial extensions of less than 250 sq m foot print, and domestic extensions)</p> <p>6.5.3.27 (W5) add: Because of concerns about the capacity of Torbay's wastewater infrastructure, possible overflows of untreated sewage into the water environment and impact on bathing water quality, all planning applications should be supported by details of how the proposed development will be drained and waste water dealt with. Details should be proportionate to the scale of the proposal. (See also natural England and Environment Agency's comments).</p> <p>7.5.14 Monitoring and Review - revise para 7.5.14: to distinguish between objectively assessed need and environmental/capacity factors. Note that growth rates may need to be adjusted upwards or downwards.</p> <p>Table 7.1: add footnote to note that figures are subject to five yearly review of the Local Plan</p>
828890	F2	Brixham Peninsula Neighbourhood Forum	Support: SDB1 Object to: C1/SS8	Generally support the Local Plan and growth levels for Brixham. Object to the deletion of AGLV	General support welcomed. Call to reinstate AGLV noted.
816891	F3	Churston Galmpton and Broadsands Community Partnership	Object to: SS1,SS2, SS4, SS6,SS8, SS9, SS11, SS12C1,C2, C5,SDB1, SDB3,TC1,TC3, TO1,TO3, SC2,SC4, W5.	Object to housing growth figures- should be 150-200 dpa. Local Plan growth levels will result in inward migration and environmental harm (support Paignton Neighbourhood Forum's views). Object to rate of growth in Brixham	<p>See general response to Paignton Neighbourhood Forum. Objections to level of growth and jobs-first approach need to be resolved through the Local Plan Examination.</p> <p>However, modifications are proposed to refer to level of growth going down as well as up, if supported by evidence of objectively assessed needs etc(see above) Key Diagram (p27) is schematic – call to amend to cover Galmpton is noted but would not add to the Plan.</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
				<p>(SDB1); should be 400 over plan period (20 pa). Object that landscape/environmental Protection around CGB area should be higher (Coastal Zone/AONB). Expand area of SDB3.1 eastwards on Key diagram to cover Golf Course and AONB. Town centre first approach to retail should be strengthened. SS6- ownership issue along cycle track (editorial matter). Refer to parking provision for home working. Strengthen rural protection policies (C1, C2 etc). Define minor developments as up to 5 dwellings. Strengthen policy on protection of recreation space. SC4 Strengthen protection of agricultural land and extend to pasture land. W5- require full details of waste water management to be submitted with planning applications, to address problem with sewer capacity</p>	<p>4.1.36 (SS2): add sentence to indicate that some development is excluded from presumption in favour of sustainable development</p> <p>4.3.18 (SS6): add after first sentence Detailed routing and design etc will need to address rights of way and access matters.</p> <p>SS8.2 Add reference to undeveloped coast</p> <p>SS8, Para 4.4.7 and Explanation to NC1: add text at end of paragraph to note that measures cannot be used to compensate intrinsically unsuitable or unsustainable development. In the case of important assets such as the SAC, development impacts that are not able to be mitigated may only be compensated if an imperative reasons of overriding public interest (IROPI) has been granted by the secretary of State. See wording recommended in response to Natural England.</p> <p>4.5.26: add 20 years and possibly beyond</p> <p>SDB1: refer to cirl buntings and safeguarded (rather than addressed) in second para.</p> <p>5.3.2.1 (SDB3): after Policy C2 add and maintain or enhance a coastal margin. See also amendments made in response to AONB Partnership/Natural England</p> <p>Refer to commercial vehicle parking at Appendix G.</p> <p>C2 Extend Undeveloped Coast designation to strip north of Long Wools. Leave Golf Course as Countryside Area. Policies Map change. The northern arm of the “jaw” is visible from the sea and forms part of coastal landscape. However the Golf Course (1st and 18th holes) is a plateau situated on the landward side of housing development.</p> <p>Policy C2: refer to seascape as well as landscape in second line of para 1.</p> <p>Policy C4 (see also English Heritage and Natural England) line 3: add historic after conservation. Start of paragraph 2: add Development proposals should seek to retain and protect existing</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
					<p>hedgerows, trees and natural landscape features wherever possible, particularly where they serve an important biodiversity role</p> <p>6.3.1.22 (C4): delete “can”</p> <p>6.3.1.24: add Established hedges have substantially more historic and environmental value than new hedges, which take time to mature and do not reflect historic enclosure patterns. Therefore existing hedges etc should be retained wherever possible. This is particularly the case where they form part of the greater Horseshoe Bat belt identified in Policy SS8.</p> <p>SC2: amend Policy to reflect NPPF.(see Sport England)</p> <p>SC4 (after grade of agricultural land): add and longstanding permanent pasture.</p> <p>6.4.3.24 (SC4): add at penultimate line its other value to agriculture (e.g. shelter, field size, location etc).</p> <p>W5 and Explanation - see amendments made in response to EA, Natural England and Paignton Neighbourhood Forum.</p>
TTCCP: 478209 CCLCP: 817448	F4	Torquay Town Centre Community Partnership and Cockington Chelston and Livermead Community Partnership (joint response)	Object to: SS1, SS2, SS3, SS4, SS5, SS8, SS9, SS11, SS12, C1, C2, SC4, SDT1, SDT2, TC1, TC2, TO1, TO2, HE1, HE2, H6, SC2, ER1, W5	<p>Growth Strategy SS1, SS2 Object. Plan is not jobs led and ignores that migration is falling. Consider as de facto objection to SS1 (although objection to 8-10k homes is not stated). Higher % of B uses should be required as part of employment provision. Object to deletion of lock gate mechanism. Five year review may show a decline in need.</p> <p>Role of neighbourhood</p>	<p>Some comments mirror those made by Paignton Neighbourhood Forum. Some amendments to indicate that growth levels may go down via five year review of the Local Plan and assessment of need (para 1.1.3, 7.5.14, 4.5.25)</p> <p>2.3.1: Add bullet point referring to country parks</p> <p>4.2.26 (SS5): add Whilst policySS5 allows for a mix of employment types, there is a need for class B1 and B2 jobs to increase the Bay’s value added and rebalance the economy away from the service sector. On this basis, proposals that provide a high proportion of “B” space will be encouraged. The 25% noted above will not be seen as a maximum.</p> <p>SS8 point 2: after “qualities of an adjoining or nearby AONB” add or other locally valued landscapes such as county parks.</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
				<p>Plan Object that Local Plan obtrudes too much into neighbourhood Plan matters. Make it clear that areas of search, timescales and capacities are not site allocations but indicative only- the Neighbourhood Plan should allocate.</p> <p>Landscape C1, HE1, C1, SS9. Need clear designation/policy on Country Parks. Should have similar weight to AONB. Make Policies C1 and C2 more restrictive of development. Object to Local Plan Strategy- Object to level of growth-supports Paignton NF's proposed growth rate. H1E1, HE2 need to clarify/provide more detail.</p> <p>Town Centres Strengthen TC1's protection of town centres and propose arts centre. Treat The Willows as out of centre in terms of sequential test. Tourism: Clarify meaning of TO1 (point 3) maritime facilities in harbour area. HMOs add additional criteria "would not conflict with any other Policy of</p>	<p>5.1.3 (SDT1): add see glossary after employment uses</p> <p>SDT2: refer to protection of historic environment (see English Heritage's comments).</p> <p>6.1.1.1. (TC1): add after second sentence It will also support the role of towns providing a range of other activities such as theatres, galleries etc.</p> <p>6.1.1.2 (TC1): add cultural after tourist in first line</p> <p>6.3.1.4: add Country Parks after countryside in first line.</p> <p>HE1/HE2 - see comments made in relation to English Heritage's representations.</p> <p>H4 - need for additional text noted (typo).</p> <p>SC2 - Revise policy (see Sport England and Paignton Neighbourhood Forum).</p> <p>6.5.2.17 (ER1): Amend to require details of flood alleviation (see Paignton Neighbourhood Forum).</p> <p>6.5.3.27 (W5): Amend to require details of waste water treatment (see Paignton Neighbourhood Forum).</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
				<p>the LP or NP". Bring A4D into effect.</p> <p>H6 –Support policy of encouraging people to live in their own homes. Should be accompanied by improving “substandard” accommodation especially privately rented accommodation.</p> <p>SC2 Recreation facilities- strengthen presumption in favour of retaining/protecting recreation facilities.</p> <p>Flooding Full details of flood risk/sewerage should be submitted at application stage to ensure that they can be addressed. Should not be left to planning conditions due to flood risks/ age of sewers.</p>	
468649	F5	St Marychurch and District Community Partnership	Object to: SDT2, SS6, TA1, H6. (Amendments requested).	Better management and penetration of public transport. (SS6, TA1) H6, (and DE3) Support policy H6 but should not reduce stock of care accommodation too far. Need to support upgrading housing stock especially private rented stock. Support for SDT2,SDT4,TO2,TO1	<p>Support noted. Matters relating to timing and connections of bus services, and extensions to less accessible streets are more relevant to LTP.</p> <p>Consider that wording of H6 is appropriate and covers the need for care homes to be taken into account when considering redevelopment proposals.</p> <p>5.1.4 (SDT1): add sentence Regeneration proposals should maintain or improve provision of public open space.</p>
496966	F6	Torre and Upton Community Partnership (Mrs.	Object to: SS1, SDT1, W5	Object to review policy (treat as SS1, 4.1.29): should be revised to allow	See comments in respect of Paignton Neighbourhood Forum. Various modifications proposed to indicate that growth trajectory may fall as well as rise, if evidence of objectively assessed needs goes down. (1.1.3,

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
		Susan Colley for)		growth rates to fall, should evidence of need indicate this. Housing should not come forward until clear evidence that the infrastructure can cope.	1.1.5, 2.2.13, 4.5.13-14, 7.5.15). See amendments to W5 resulting from EA and Paignton Neighbourhood Forum's comments
468932	F7	Paignton Heritage Society	Object to: SDP1,DE1	Propose new conservation area serving Paignton seafront and linking other CAs.	The Local Plan does not propose conservation areas. Most of the town centre is already CA and there is danger of the concept being watered down if spread too widely.
418700	F8	Stoke Gabriel Parish Council	Object to: SS1 etc, HE1, ER1.	Object to Plan – endorse Paignton neighbourhood forum's comments. Additional comments on flooding, light pollution, preventing rat-running and propose new conservation area at Yalberton. Endorse part of Paignton NF's comments	See response to Paignton Neighbourhood Forum's comments. 4.4.13 (SS9) - mention Yalberton Valley The Local Plan does not propose conservation areas See amendments to DE1 in response to English Heritage and Paignton Neighbourhood Forum 4.3.17 (SS6): amend as follows - reduce rat-running, including through Marldon/berry Pomeroy and impacts elsewhere 6.3.1.6(C1): see responses to Natural England on dark corridors. Add after "appropriate" in penultimate line: and reflected in the choice of lighting solutions to minimise the impact of light pollution, particularly on greater horseshoe bats (see policy SS8) and other wildlife
830233	F9	Stoke Gabriel Parish Plan Group	Object to:SS1,C1,C2, C4, SS9, SS6, SS13, ER1	Support Paignton Neighbourhood Forum's comments (i.e. SS1 Obj). Object that insufficient protection given to environment at Yalberton Valley, including Orchards. Make green wedge polices stronger (C1 and C4) and stronger on resisting light pollution. Reduce rat-running (refer to Aisha, Whitehill and	See responses to Paignton Neighbourhood Forum and Stoke Gabriel Parish Council. At 6.3.1.25 (C4) after third sentence add: Whilst orchards are often not protected by TPOs, and permission is not needed to prune trees grown for the production of fruit; orchards can nevertheless serve valuable green infrastructure and local heritage role as well as being an excellent form of sustainable food production. On this basis, proposals affecting orchards will be considered on the basis of Policies SS9, C4 and SC4. At 6.4.3.25 (SC4) add: The enhancement of orchards will be supported, particularly where this would strengthen the growing of

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
				Galmpton at 4.3.17). Strengthen reference to SUDS in ER1 and SS13	local varieties of fruits. See changes to ER1 made in response to EA.
847437	F10	Stoke Gabriel Low-E Group.	Object to: SS1, DE1, DE2, SS10, SS13, DE1, H2 H3, ES1	Support Paignton neighbourhood Forum's comments (SS1 Obj) Government's Standards Review reduces scope to set local targets on energy efficiency etc. H3- make more Council land available for self build. Various minor amendments about achieving tenure neutral design etc.	See responses to Paignton Neighbourhood Forum, Stoke Gabriel Parish Council, Parish Plan Group DE1 Design Considerations - add: 10. Promote tenure neutral design, materials and location of affordable housing. 6.4.1.8 (H2) add: Developments should be "tenure neutral" as far as practicable, so that affordable housing is not distinguishable from market housing by layout, design or materials. Passive Solar gains- this is already covered in ES1
844172	F11	Collaton Defence League	Object to: SS1,C1, SDP3, SS7,ER1,	Object to overall level of growth. Object to development at Collaton St Mary. Plan is not supported by an adequate infrastructure delivery plan- specifically relating to flooding. Object to deletion of AGLV.	See response to Paignton Neighbourhood Forum. The Torbay Infrastructure Delivery Study was published in January 2012, and supported by an updated Viability Assessment in 2014. Detailed local requirements for Collaton will be resolved through Masterplanning. There is no legal requirement for Councils to prepare CIL. However, it is intended to publish a Draft CIL Charging Schedule in Autumn 2014
Business Sector/Organisations/Social Enterprise Sector					
Agent: 847469 Consultee: 847470	B1	SW HARP Planning Consortium (Tetlow King for)	Object to SS1,SS2, SS4, SS5, SS8, SS12, TA2, C1, H2, H3, H6, DE1, DE2, DE3, SC1, SC4, ER1	Object that housing numbers are below objectively assessed need (12,300 dwellings) and SHMA is out of date. Future growth areas should be brought forward sooner to increase supply of housing. Object that job creation	Objection to objectively assessed need will need to be addressed in Examination (c.f. Paignton Neighbourhood Forum's assessment of need. Issues around relationship between jobs and housing will be dealt with through Local Plan review. See response to HBF below. Big ticket items at 2.3.1 separate affordable and self build into two bullets: <ul style="list-style-type: none"> • Support affordable housing to meet local needs • Support affordable self build and custom built homes for local people, across the bay

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
				target will lead to in-commuting. Object to affordable housing requirements being relaxed in order to help viability. Concerns about self-build policy.	<p>Aspiration 4: add bullet point Provide affordable housing to meet locally arising need.</p> <p>SS6 - Considered that Torbay's poor economic situation justifies a policy seeking to retain employment uses beyond letter of NPPF para 22. However add to end of penultimate paragraph of SS5: Where there is no reasonable prospect of the site being used for other (i.e. non Class B) employment purposes or such a use would conflict with the Local Plan, alternative uses that support sustainable local communities will be supported.</p> <p>TA2 para 3 amend (to bring in line with NPPF): ...will not be permitted where there is an unacceptable impact on road safety or severe impact (including cumulative effects) on the function and operational efficiency of the networks.</p> <p>Policy C1 first point of para 3 add: ...or self build affordable housing where acceptable under Policy H3.</p> <p>H3.2 replace at least 12 months with a reasonable period</p> <p>6.4.1.24 (H3): add Guidance will cover matters such as Where secured on rural exceptions sites or as a form of affordable housing, planning conditions will be used to restrict occupancy to people with a local connection in perpetuity.</p> <p>6.4.1.24 (H3): add At end of paragraph, add: This will address matters such as how long plots need to be marketed before they may "cascade" as other forms of housing – 12 months will be used as a starting point. In addition, where self build plots are secured on rural exceptions sites or as affordable housing, planning conditions will be used to restrict occupancy to people with a local connection. The operation of this will also be addressed in further guidance.</p> <p>6.4.2.5 (DE1): at end of first sentence add proportionate to the scale of the proposal.</p> <p>6.4.2.10 (DE2) and 6.4.2.20 (DE3) - Note that the Government is carrying out a Housing Standards Review and the guidelines in this</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²) policy may need revising when this is adopted.
Agent: 847471 Consultee: 440790	B2	South Devon College (GVA for)	Minor amendments suggested to SS3,SS4, ES1	Broadly support the Local Plan. Refer to SDC's renewable energy area of excellence.	Support welcomed. Minor amendments as follows: Para 4.2.20 (SS4): add new penultimate sentence for example, using South Devon College's expertise in delivering renewable energy solutions in new, and upgrading existing development. 6.4.3.17 (SC3): mention South Devon College as a partner Last bullet mention such as South Devon High School 6.4.3.21 (SC3): add For example developers will be encouraged to use employment and skills plans to better establish links between education and employment.
817760	B3	Torbay Business Forum	Object to: SS4 and TO2 (Minor amendments requested).	Support overall level of growth and supportive framework for investment, (SS1, E1, SS4 Support) SS4 Plan should make more provision for Science/IT Park. TO2 - make for provision for 4-5 star hotel	General support welcomed. Whilst the need for a science/IT park is noted, this is likely to need cross-subsidy as part of a mixed use scheme delivered through Masterplanning. However the Plan would support such a proposal should it arise. At 6.1.2.5 (TO1): add In particular proposals for new 4 or 5 star hotels would be supported in order to meet a growing demand (as identified by the Business Forum) for high class accommodation.
468963	B4	Babbacombe Bay BID	Aspiration 1 SDT4, TC2 (minor amendments requested).	Mention Babbacombe Bay BID Area. (Not objections in principle to the Plan)	Support welcomed. Consider that a mention of Babbacombe Bay BID area is more relevant in reference to retail at 6.1.1.6 (TC2) .
Development Industry - Housing					
844154	HB1	Home Builders Federation	Object to: SS1, SS11, SS12, H1, H2, H3, TA1, DE2, DE3, ES1.	Object to housing numbers- below objectively assessed need (13,000 dwellings). Raises Duty to Cooperate issues (i.e. unmet requirement should be met in adjoining areas). Lack of 5 year supply. Concerns that policy on energy, Building for Life,	Duty to Cooperate/Cross Boundary issues Torbay UA, Teignbridge District, South Hams District and Devon County Councils agree that Torbay is a relatively self contained housing market, based on the 2007 SHMA. The Teignbridge Local Plan Examination raised no cross boundary objections. Teignbridge is less constrained than South Hams (it is not AONB) and has better transport links with Torbay, and is the logical location for development that could not be met within Torbay. Torbay is able to meet its objectively assessed need for at least the first 10 years of the Plan (and probably longer- see below). The Local Plan undertakes to carry out five yearly reviews on a cross boundary basis to

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
				<p>space standards etc will impact on viability.</p> <p>Torbay should be considered as part of a wider housing market judged by degree of self containment (@70% local self containment is a useful benchmark for an HMA).</p>	<p>consider objectively assessed need, whether the HMA boundaries remain relevant, and the suitability of land. There are also considerations of the function of settlements. This is outlined in section 7.5 of the Local Plan, and in the Duty to Cooperate Statement. Teignbridge's concerns at the draft Local Plan stage have been overcome and there is support for all the neighbouring districts and County for the Torbay Local Plan.</p> <p>Objectively Assessed Need This is dealt with in the Council's Growth Topic Paper. Evidence by Paignton Neighbourhood Forum and other argues that Torbay is exceeding its objectively assessed need to an unsustainable degree.</p> <p>The PPG indicates that household projections are the starting point for assessing housing requirements, although sensitivity testing for matters such as price signals and affordable housing should also take place at plan making stage.</p> <p>The 2011 Interim Household projections indicate a requirement for around 450 dwellings a year to 2021. The Local Plan is able to meet this requirement. The 2012 based (released 2014) population projections are around a third lower than the 2011 projections. They show an increase in population of 11,000 people between 2011-21. The Topic Paper shows that they are based upon very high migration assumptions and cannot be categorized as "recession based" projections. Moreover the 2011 census showed that no fall in household size occurred between 2001-11. The 2014 (forthcoming) household projections must therefore be lower than the 2013 Interim projections. The Council estimates that by 2019 (i.e. in five years time) there will be approximately 1,150 additional households, (2500 household population divided by 2.17 household size). This equates to a 5 year supply of 230 dpa.</p> <p>The Local Plan is proposing almost double this demographically implied provision in recognition of the need to increase the housing supply to provide affordable housing and economic prosperity.</p> <p>Moreover Torbay has an ample stock of sites with planning permission-consistently around 2,500. Therefore the constraint has not been lack of supply but a lack of demand.</p> <p>The PBA Housing Requirements Report suggests that Torbay should</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
					<p>provide about 450 dwellings per year in the first five years of the Plan period. Higher growth rates in later parts of the Plan period are driven by job growth being achieved. Progress towards this needs to be through review of the Local Plan.</p> <p>Viability: The Local Plan (and accompanying SHLAA) is been subject to several viability checks, in 2008, 2012 and most recently in 2014. The Torbay Local Plan Viability Testing Report (PBA 2014) assessed an emerging draft of the Local Plan and traffic lighted those policies which could have an impact on viability. These have been revised to make clear that requirements are proportionate to the development.</p> <p>It will be noted that the market has continued to improve since the viability report was carried out.</p> <p>The Council acknowledges that Government mandatory design standards are likely to be introduced soon, in response to the Housing Standards Review.</p> <p>6.4.2.10 (DE3): refer to Housing Standards Review.</p> <p>6.5.1.6. (ES1): refer to allowable solutions as part of Design Standards Review</p> <p>Viability of Windfalls As acknowledged by HBF, sites of 3 or fewer dwellings are not liable for affordable housing contributions on green field sites, and 15 dwellings for brownfield sites. This will exempt most windfall development from affordable housing requirement. The council has amended many of the Local Plan Policies to state that requirements are proportionate to the scale of development.</p> <p>Paragraph 7.4.12 indicates that where S106 requirements render development unviable, this will be negotiated.</p> <p>7.4.12 (Delivery and Monitoring section): amend paragraph as follows - Where s106 Planning Obligations or other requirements are argued to render development unviable...assessment of viability. Such assessments will be proportionate to the scale and nature of the application.</p> <p>Affordable Housing The viability report (PBA op. cit.) accepts that</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
					affordable housing is likely to be the main factor affecting the viability of housing. However, Torbay has a need for affordable housing (rather than market housing for the indigenous population), and a significant amount of its supply is from small sites. The rates sought by Policy H6 are relatively modest: up to 20% for brownfield sites and 25%+5% self build on greenfield sites. Paragraph 6.4.1.2 notes that affordable housing provision may be negotiated where viability is an issue. 6.4.1.7 (H2): amend paragraph clarify that threshold is 3+ dwellings for greenfield sites and 15+ for brownfield sites, unless the Government's review of affordable housing thresholds introduces a minimum threshold of 10 dwellings (in which case a 10 dwelling g/f and 15 dwelling b/f threshold will apply).
Agent: 844168 Consultee: 356404	HB2	McCarthy and Stone (The Planning Bureau/Ziyad Thomas for)	Support: H6	Local plans should make provision for people in need of care. Policy H6 of the Local Plan is supported	Support is welcomed.
844178	HB3	PCL Planning (for Sladnor Park)	Object to: SS1, SS11, SDT1	Support many aspects of the Plan. Object to housing level- should be 11,500-13,500 to meet objectively assessed need. Propose Sladnor Park as a housing site.	See response to HBF in relation to objectively assessed need. Sladnor Park is indicated in the SHLAA as a site with planning permission as a retirement village with 24 independent living units (P/2006/P/2007/1410 and P/2009/0240RM, SHLAA site 13037). There have been discussions about bringing forward mixed use development of hotel and residential use. There is understood to be support from the Neighbourhood Forum about the principle of development through the Neighbourhood Plan. However, the permission is expired and the site is not shown in Appendix D of the Local Plan, or the Policies Map Any development of the site would need to reflect the special coastal landscape and biodiversity characteristics of the site (OSWI, UWS, and Coastal Area). There are also sewerage constraints in Maidencombe. The site is located some way away from a significant settlement, and although served by the A379, there are no proposals to upgrade the wider highway infrastructure in the vicinity (i.e. T23 Northern Distributor Road in the Adopted Local Plan is no longer proposed).

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
Agent: 844186 Consultee: 844185	HB4	Landford Estates (K&L Gates on behalf of)	Object to TO2.	Object to inclusion of Corbyn Apartments within Core Tourism Investment Areas. Evidence base behind tourism policies is out of date.	On this basis it is not considered appropriate to amend the Local Plan. Proposals coming forward on the site will need to be in character with the rural and costal landscape setting, and biodiversity issues of the site. The Tourism Trends Report (2012) provides an up to date assessment of tourism supply and demand. The Local Plan's tourism strategy is supported by the English Riviera Tourism Board. The Corbyn Apartments are within an amber zone in the 2010 "Further Guidance on PHAAs". Other amber areas have not been included in CTIAs. However, a mixed use holiday/ residential use has been agreed. The apartments are located within a key tourism area with good passing trade. It is a modern building with sea views, offering five star accommodation. On this basis it is considered appropriate to retain within the CTIA
Agent: 844190 Consultee: 791437	HB5	Bloor Homes (Barton Willmore on behalf of): mainly re. Churston interests.	Object to: SS1, SS11, C1, SDB1.	Object that housing target is too low. Detailed assessment to argue that requirement is 900-1100 dpa. Provides a housing market area assessment at wider than Torbay's boundaries. Object that Policy C1 imposes a de facto green belt. Brixham and Churston are artificially constrained below actual potential.	See response to HBF in relation to objectively assessed need. N.B. Barton Willmore have submitted a major assessment based on cross boundary HMA data. This will need to be debated in the Local Plan Examination. The Council does not agree with the level of need identified by Barton Willmore. Policy C1 is aimed at protecting open countryside for its intrinsic landscape, biodiversity etc value. Whilst it can also protect green-wedges, this is much more localized than a greenbelt, and relates to the landscape value of land. A number of types of development compatible with the countryside are identified. The Council does not agree that the Policy is seeking to create a greenbelt (which is a cordon sanitaire to prevent urban sprawl not related to the intrinsic value of land thereby protected). The constraints around Brixham reflect national constraints (AONB) and sensitive coastal landscapes and the South Hams SAC.
Agent: 844198 Consultee: 791437	HB6	Bloor Homes - Boyer Planning on behalf of (mainly Collaton St Mary land interests)	Object to: ASP1, ASP4, SS1, SS2, SS3, SS4, SS5, SS6, SS10, SS11, SDP3, SDP1, SDP3.	Housing numbers do not meet objectively assessed need and does not meet wider benefits of housing. Future Growth Areas should not be constrained and should be brought forward sooner (i.e. should be clear allocations). The	See response on objectively assessed needs in relation to HBF above. Boyer Planning request an undertaking to provide sufficient homes to meet economic requirement: whereas objections such a Paignton Neighbourhood Forum request enough jobs to meet homes. The Council considers that the Local Plan adopts a balanced position of seeking to provide a mix of homes and employment, with 5 year progress checks through the Local Plan Review. However make this approach more explicit in Aspiration 1: Aspiration 1 , add bullet:

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
				Strategic Development policies should not contain highly detailed matters, e.g. local wildlife issues). SS3 should say “in accordance with” rather than reflect presumption in favour of sustainable development.	<ul style="list-style-type: none"> Provide a balanced provision of housing and employment. <p>Consider that the wording of SS3 adequately represents the NPPF and amending it would not add to the Local Plan.</p> <p>Overall support for SDP3 noted. The Council considers that matters such as greater horseshoe bats are relevant to a strategic level policy and reference to them should remain.</p> <p>The Local Plan phasing reflects infrastructure constraints with this area (highways, sewerage, flooding, and biodiversity).</p>
Agent: 844316 Consultee: 844315	HB7	Taylor Wimpey (Exeter Ltd) Origin3 for (Colin Danks)	Object to: SS1, SS2, SS6, SDP1, SDP3, SS2, SS12, H3.	Object to housing figure-below objectively assessed need (12,300 dwellings). SPD3/SS2 support Future Growth Area at Collaton St Mary. Should be brought forward earlier in plan period (object to phasing and requirement for non-housing uses unless a need can be shown). SS6- support upgrading of A385 Totnes Road. SS12 (5 year supply): policy replicates N PPF and should be deleted. H3 (affordable housing). No objection in principle but policy should set out mechanisms to determine site viability.	See response to HBF above regarding objectively assessed need. The Council considers that the Local Plan approach to seek to bring forward brown field development is appropriate. Phasing - The Local Plan’s phasing assumptions are based on likely infrastructure constraints rather than rigid phasing- although this matter is subject to objection e.g. for Paignton Neighbourhood Forum. 4.1.32 - Modification to refer to Masterplanning process (as above) SS5: modify penultimate paragraph of policy (as above) to indicate where use of employment space/land may be permitted. Overall support for SDP3 Noted. The Council do not propose to remove Policy SS12 “five year supply” but would not object to its deletion if an Inspector considered that it largely repeats NPPF paragraph 47, and is also covered in Policy H1 6.4.1.15 (H3): add In considering viability matters, regard will be had to best practice, particularly as set out in Planning Practice Guidance (PPG).
Agent: 829991 Consultee:	HB8	Mrs. J Tyrell (Herridge Property Consulting for)	Support: SS1, SDP1, SPD3.	SS2, SDP1, SPD3 support. Support Collaton St Mary growth area. Former	Support for SDP3 and confirmation that Torbay Holiday Motel is available for development is welcomed.

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
844323				Torbay Motel is available for redevelopment.	
Agent: 844334 Consultee: 844326	HB9	Devonshire Park (Former Nortel site). Blue Sky Planning for.	Object to: SS1, SS2, SD1, SPD3.	<p>General support for Plan but object that there is undue reliance on Neighbourhood Plans and Masterplans to deliver sites (particularly former Nortel). This should be made into a clear allocation. Object to phasing- should be allowed to come forward earlier in Plan period. Clarity sought that employment space also comprises non-B uses.</p> <p>Plan should make clearer distinction between Strategic Delivery Areas and Future Growth Areas.</p>	<p>Overall support and confirmation that former Nortel site is deliverable is welcomed. Former Nortel is allocated for mixed use (@3ha housing and 1ha residential) in Policy SDP3. The SHLAA indicates delivery as being likely post 2023. However the Local Plan suggests that delivery in years 6-10 is more likely.</p> <p>Suggestions to SS1 noted but would change the thrust of this policy. However, under SS1 Existing commitments add Most of this growth will come forward on committed sites..."</p> <p>Need for additional certainty about Devonshire Park (Nortel site) is noted.</p> <p>Policy SDP3 second line: amend "family housing" to housing, especially family housing... local recreation and local retail facilities</p> <p>Table 5.12 SDP 3.4: refer to former Nortel (n.b. numbers are already included in SDP3.4). Add note: Early delivery of brownfield sites such as former Nortel will be supported.</p> <p>5.2.2.10 (SDP3): from line 4 amend as follows - although mixed use residential schemes will be supported subject to other Local plan Considerations. However the Local Plan promotes them for mixed use development comprising a significant element of residential development to assist in the short to medium term supply of housing. As a broad guide, around 25% of the former Nortel site and a third 33% of the Yalberton Road (Jackson Land) will be sought for employment uses and 75% for residential ...(at end of paragraph) , and early delivery will be supported, subject to other Local Plan considerations.</p>
Agent: 844351 Consultee: 844349	HB10	Waddeton Park LTD -PCL Planning for ("Jackson family" land)	Object to: SS1, SS11, SDP1	<p>Support many aspects of the Plan. Support principle of development in west of Paignton. Object to housing level- should be 11,500-13,500 Paignton could accommodate higher</p>	<p>See response to HBF on objectively assessed need. The Council considers that it is unlikely that Paignton has significant capacity to exceed Local Plan figures due to environmental constraints, particularly the greater horseshoe bat corridor.</p> <p>5.2.2.10 (SDP3) As above amend to require around a third of Jackson land (@2.4 ha) to be employment and two thirds residential. This is slightly less than the 30% requested in order to keep</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
				growth rate. Request lower % of employment as part of Future Growth Areas.	a differential between Nortel (with significant constraints) and the Jackson land which is greenfield. .
Agent: 844863 Consultee: 844862	HB11	Abacus Properties and Deeley Freed (Stride Treglown for)	Object to: SS1, SS4, TC2, SDB1, SDP3.	<p>Object that Local plan is not meeting objectively assessed requirement, and Torbay should be a +20% NPPF buffer area. 900 dpa needed for first part of Plan period. Low housing target will constrain employment growth.</p> <p>Propose land at south of White Rock (T756b)/SDP3.5. White Rock should be a local/district centre. Would provide opportunities for South Devon College expansion.</p>	<p>See response to HBF on overall growth levels.</p> <p>Note that application P/2011/0197 makes provision for: Mixed Use Development of 39 Hectares of land at White Rock, Paignton to construct up to 350 dwellings, approximately 36,800m² gross employment floorspace, a local centre including food retail (up to 1652m² gross) with additional 392m²A1/A3 use and student accommodation, approximately 15 hectares of open space, sports pavilion and associated infrastructure and engineering works to provide access, drainage and landscaping.</p> <p>This could meet the needs of college expansion.</p> <p>Paragraph 6.1.1.8 of the Local Plan indicates that White Rock will be allocated as a local centre when completed.</p> <p>TC2 retail hierarchy table. Denote Great Parks and White Rock as local centres (with notation that will gain local centre status once complete).</p> <p>Abacus Properties are promoting land south of White Rock as an expansion to the above approval. The 2013 SHLAA considered this area suitable for development (site T756b). The Council has not included this area as a Future Growth Area, because of concerns about the impact on the Dart Valley, which is AONB, and impact on biodiversity. The land is part of the LEMP (Landscape and Ecology Management Plan) serving White Rock "Phase1".</p> <p>The land at White Rock was rejected by the Secretary of State in 1997 following a Call In Inquiry (P/1995/1304: SW/P/5183/220/4).</p> <p>Therefore the Council is not proposing the land south of White Rock. However, it would not object to the inclusion of the land within SPD3.5 so long as Abacus properties showed that landscape (including cross boundary) and biodiversity issues (including LEMP) could be addressed and that contribution were made towards the Western Corridor.</p>

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
Agent: 844870 Consultee: 442694	HB12	Northern trust (Tetlow King for)	Object to: SS1, SS2, SS3, SS7, SS8, SS9, SS10, SS11, SS12, SDB1, SDB3, TO2, TA2, NC1, H1, H2, DE1, DE2, DE3, SC1, SC4, ES1	Object that growth levels are too low. Support Wall Park, Brixham, as a future growth area, but policies should be less restrictive and make the site a definite allocation. Concern about cumulative impact of various policies on viability. Policy TA2 should refer to sustainable modes of travel, not "non-car".	See response to HBF on growth levels and matters relating to viability (of design policies etc). Wall Park is within the AONB and affected by the Special Area of Conservation, due to greater horseshoe bats. Therefore the growth area policy (with modifications requested by Natural England) is considered appropriate for the Berry Head peninsula. Table 5.17 (SDB3): add Churston village envelope or built up area of Brixham Policy TA2.3: replace "non-car" with sustainable (c.f. NPPF para 30).
Agent: 830010 Consultee: 830289	HB13	Mrs. Hosking (Smithsgore for)	Object to: SS1, SS8, SS12, SDB1, SDB3.	Object that Plan does not meet objectively assessed need, particularly in Brixham. . Plan should define what is meant by major development in the AONB. New housing site proposed St Marys Park and Upton Manor Campsite	See response above to HBF on objectively assessed need. St Marys Park is partly allocated for housing within the Adopted Torbay Local Plan (H1.22) and shown as this on the 2013 SHLAA update. (But was not known at this time to be being actively promoted) The site is within the AONB and substantially greenfield and is not proposed for development by the Council for this reason. However, the Council accepts that it is relatively enclosed and close to Sharkham Village. The Local Plan defines major development in the Glossary. It is for the Government to define what it means by major development in para 116 of the NPPF.

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
844875	HB14	Gladman Developments	Object to: SS1, SS11, C1, H2,	Object that Local Plan is not meeting objectively assessed need and PBA Housing Requirements Report is itself likely to be an underestimate. This may be a duty to Cooperate issue as there may be a need to find housing on neighbouring land. Support future growth areas and brownfield development, but should not preclude development elsewhere. Green wedge policies should not be given too much weight. The Local Plan should be supported with a consequences report if not seeking to meet needs in full.	See response to HBF regarding objectively assessed need, duty to cooperate, consideration of countryside/landscape constraints and viability considerations.
Retail Developers (Supermarkets)					
Agent: 844903 Consultee: 365896	S1	Sainsbury's (WYG for)	Object to: TC1 and TC3	Support overall hierarchy. Object to Willows District Centre being constrained.	Compare Sainsbury's comments to Paignton Neighbourhood Forum, and others. The Willows District Centre functions as an out of town centre which is heavily car dependent. On this basis the Council do not propose to modify the hierarchy and considerations set out in TC3. Notwithstanding this, the District Centre is largely developed and creating additional floor area would be likely to require additional land-take.
Agent: 845691 Consultee: 845688	S2	Tescos (Amethyst Properties for)	Object to: .SS2, SS6, SDT1, SDT3, TC1, TC3.	Object to designation of Edginswell as B1 employment. B1 not viable and therefore Gateway and Edginswell Halt are not deliverable. Test of retail harm to town centres is too high.	The site at Edginswell Gateway/Kerswell is the subject of a current appeal, and masterplanning. The Masterplan allows for a mix of uses including residential to provide deliverability. The Edginswell site is highly accessible due to the forthcoming South Devon Link Road, and the Council do not accept that it would be unviable for non-retail employment development.

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
					Whilst need does not have to be demonstrated under the NPPF, the 2013 Retail update must necessarily be revised downwards in the face of the 2012 based (2014) population projections. (The 2013 Update being based on 2010 Experian figures). This increases Paignton Neighbourhood Forum and others' contention that additional out of centre retail would harm existing town centres.
Private Individuals – Torquay (excluding Broadley Drive)					
830296	T11	Julian Sanders	Object to: HE1, HE2, SDT3	Protect the historic setting of Edginswell Hall (treat as general observation not objections in principle).	Housing around Edginswell Hall has been approved as enabling development to improve the Hall. The need to protect the setting of the listed building from harm from (more distant) development is noted. 5.1.2.2 (SDT3): add (after Location of the site) In particular the setting of Edginswell Hall and village should be conserved or enhanced.
845042	T12	Anthony Garlick	Object to: SS9 and HE1	Object to inclusion of Redstone in the Country Park and Conservation Area.	Redstones is an unauthorised development that is the subject of enforcement action. It is on the edge of the Country Park (the buildings and access do not appear on the OS base but appear to be just outside of the Country Park) and within the Cockington Conservation Area. It is outside of the historic settlement of Cockington Village. It forms part of the link between the rural Cockington Lane and fields/valley system to the north west. The Local Plan does not designate conservation areas.
846990	BD1	Ms Giustina Matassa	Object to:SDT1	Object to housing site at top of Broadley Drive (SHLAA T707). Reasons include landscape impact, loss of greenspace, wildlife, transport impact, lack of school places, doctors and other infrastructure. Water run-off. Significant development is proposed in the area at Hollicombe.	The site is identified in the Local Plan as being a SHLAA site for consideration through the Neighbourhood Planning process. The Council considers that the site is best left in the Policies Map on a "for information" basis and determined through the Torquay Neighbourhood Plan. However, the Torquay Neighbourhood Forum and the Local Plan Inspector are alerted to the high level of public objection to the site.
847011	2	Carole Seaton	Object to:SDT1	As above	As above
825984	3	Mr Martin Read	Object to:SDT1	As above	As above
824957	4	Mr peter Apps	Object to:SDT1	As above	As above
822026	5	Mr Graham Whetlor	Object to:SDT1	As above	As above
830275	6	Mr Philip Thomas	Object to:SDT1	As above	As above

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
828726	7	Mrs. Liz Dobson	Object to:SDT1	As above	As above
836300	8	Mr Kingsley Woods	Object to:SDT1	As above	As above
847010	9	David Sanders	Object to:SDT1	As above	As above
847009	10	Dr S S Gill	Object to:SDT1	As above	As above
847008	11	Sonia Sanders	Object to:SDT1	As above	As above
847006	12	Shirley and Brian Clement	Object to:SDT1	As above	As above
826172	13	Andrew Gibbs	Object to:SDT1	As above	As above
846986	14	John and Gillian Cook	Object to:SDT1	As above	As above
846988	15	M A Arthur	Object to:SDT1	As above	As above
847084	16	Chris and Joe Greatrex	Object to:SDT1	As above	As above
847820	17	John Francis	Object to:SDT1	As above	As above
846983	18	Chris Dainton	Object to:SDT1	As above	As above
846634	19	Mr and Mrs. H E Newman	Object to:SDT1	As above	As above
846738	20	Mr Pietro Matassa	Object to:SDT1	As above	As above
846731	21	Chris Lander	Object to:SDT1	As above Object that increase in housing and 750 jobs per year is too high. The Local Plan should take a jobs first approach.	As above
846617	22	Peter Snow	Object to SDT1. TC1 general observation.	As above. Better to condense shopping area and reuse vacant shops for housing- these would be close to facilities.	As above
845238	23	Sue Macleod	Object to:SDT1	As above	As above
847088	24	Sheila Morley	Object to:SDT1	As above	
847381	25	Mrs. Jill Smallshaw	Object to:SDT1	As above	As above
823348	26	John Wright	Object to:SDT1	As above	As above
847095	27	Mrs. Christina Wright	Object to:SDT1	As above	As above
845670	28	Mr Andrew Fiderkiewicz	Object to:SDT1	As above	As above
846586	29	David Searle	Object to:SDT1	As above	As above
846581	30	Helen Booth	SDT1	As above	As above
846594	31	Wing commander	SDT1	As above	As above

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		Trevor Oakley and Peggy Oakley			
847082	32	Mrs. E A Pring	Object to:SDT1	As above	As above
846590	33	Mrs. D O Nunn and Mr P Nunn	Object to:SDT1	As above	As above
846599	34	Carol Franks	Object to:SDT1	As above	As above
845220	35	David Bickford	Object to:SDT1	As above	As above
845230	36	Stephanie Bickford	Object to:SDT1	As above	As above
846613	37	Dennis Huxley	Object to:SDT1	As above	As above
846616	38	Lesley Richardson	Object to:SDT1	As above	As above
829508	39	David Newton	Object to:SDT1	As above	As above
847311	40	George Govier	Object to:SDT1	As above	
847272	41	Mr and Mrs. R White	Object to:SDT1	As above	As above
847344	42	Neil Stanlake	Object to:SDT1	As above	As above
847024	43	David Dabbs	Object to:SDT1	As above	As above
847023	44	Carol Stanlake	Object to:SDT1	As above	As above
847276	45	Shirley Dabbs	Object to:SDT1	As above	As above
847308	46	Margaret Butler	Object to:SDT1	As above	As above
847026	47	Audrey Keenan	Object to:SDT1	As above	As above
847027	48	Roger Keenan	Object to:SDT1	As above	As above
847025	49	June Secker	Object to:SDT1	As above	As above
847246	50	Sarah Bird	Object to:SDT1	As above	As above
847242	51	Martin Newey	Object to:SDT1	As above	As above
847241	52	Anne Krasnopolski	Object to:SDT1	As above	As above
847019	53	Adam Krasnopolski	Object to:SDT1	As above	As above
847237	54	Yvette Ball	Object to:SDT1	As above	As above
847238	55	Mark Ball	Object to:SDT1	As above	As above
847368	56	Robert White	Object to:SDT1	As above	As above
400134	57	Denis J Reid VRD	Object to:SDT1	As above	As above
847370	58	George Broom	Object to:SDT1	As above	As above
847818	59	Ann Broom	Object to:SDT1	As above	As above
847222	60	Patrick Canavan	Object to: SDT1, SS1	As above Plan should safeguard the environment by taking more radical approach to redeveloping town centres.	As above
847359	61	R N Carter FRICS	Object to:SDT1	As above	As above

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
847356	62	Thomas Hunt	Object to:SDT1	As above	As above
847348	63	T A Davies	Object to SDT1, SS1	Broadly Drive as above. Level of growth in Plan is too high due to lack of employment in the region.	As above
847285	64	Carolyn Perrett	Object to:SDT1	As above	As above
847287	65	Judith Keane Andrew Miller	Object to:SDT1	As above	As above
845224	66	LYN SMITH	Object to:SDT1	As above	As above
847280	67	SUZANNE SENGUPTA	Object to:SDT1	As above	As above
847018	68	Atanu Sengupta	Object to:SDT1	As above	As above
847021	69	Mrs. S A Wilson	Object to:SDT1	As above	As above
847090	70	WJ Bagwell	Object to:SDT1	As above	As above
845335	71	Jane Wills	Object to:SDT1	As above	As above
845189	72	Michael Holder	Object to:SDT1	As above	As above
845195	73	Margaret Holder	Object to:SDT1	As above	As above
845185	74	Mr and Mrs. Crapnell	Object to:SDT1	As above	As above
845199	75	Mr Ian Lane	Object to:SDT1	As above	As above
845203	76	Mrs. Jennifer Lane	Object to:SDT1	As above	As above
845212	77	Mr Howard Richards	Object to:SDT1	As above	As above
847797	78	Helen Thomas	Object to:SDT1	As above	As above
847013	79	Andrew Stockman	Object to:SDT1	As above	As above
847792	80	Michel Thomas	Object to:SDT1	As above	As above
847795	81	Sally Jane Thomas	Object to:SDT1	As above	As above
847804	82	Geoff and Beryl Booth	Object to:SDT1	As above	As above
847791	83	L.J. Moxham	Object to:SDT1	As above	As above
847789	84	Patricia Bickford	Object to:SDT1	As above	As above
Private Individuals - Paignton					
417506	PI1	Adrian Gee	Object to: SS1, SS2, SDP1, SPD3.	Object to housing numbers- plan does not take a jobs led approach. Object to development at Collaton St Mary: urban sprawl, flooding/drainage,	See detailed response to Paignton Neighbourhood Forum/Collaton Defence League above. Detailed height etc matters raised by Mr Gee will be considered as part of the Masterplan for the area.

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
				highways, landscape issues. Development should focus on lower risk flood areas.	
829682	PI2	Leaf Lovejoy	Object to: SDP3, SS9, C1,ER1	Object to Collaton St Mary due to impact on Stoke Gabriel. Propose Yalberton Valley and conservation area/ green infrastructure corridor.	See detailed response to Paignton Neighbourhood Forum/Collaton Defence League, Stoke Gabriel PC and Local Plan Group above. Modification to paragraph 4.4.15 to refer to Yalberton Valley is noted above.
468988	PI3	John Pouney	Object to: SS1,SS11	Need for more greenfield housing sites to avoid town cramming. Need more cycling facilities in parks. Promote fresh food markets in town centres to promote healthy eating.	Comments are noted. The Local Plan does seek to provide a range of housing including family housing on greenfield sites. See response to HBF on overall levels of growth. Consider that the Local Plan does promote off-road cycling (Policy TA2) and access to fresh food (TC1 and SC1). Local "Farmers Markets" are unlikely to need permission and are primarily a town centre management issue: however they would be supported in principle by Policy TC1and SC4.
358268	PI4	Mr Michael Webster	Object to; SS1, H1, SS2, SDP3, C1, HE1, DE1, SS6, TA1, DE1.	Object to growth levels- population figures are exaggerated. Local Plan should take a stronger protection of greenfield sites and green wedges. Proposes a conservation area in Yalberton Valley. Reinstate AGLV. Greater emphasis on flood protection.	Concerns about growth levels and deletion of AGLV are noted. See response to Paignton Neighbourhood Forum and others. See modifications suggested in response to Natural England with regard to maintaining dark skies.
Private Individuals – Galmpton/Churston					
429416	G11	Steve Sherrin	Object to: ER1, SS, SS11 H1, H2, IF1, SDB1, TA1	Strengthen policy restricting development on floodplains, Object to number of dwellings and jobs (Overestimation of need will lead to second	Objections noted. See response to Paignton Neighbourhood Forum and others. See amendments to ER1 above, made in response to Environment Agency. Policies SS6 and TA1 seek to reduce pollution etc from traffic. Policy

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
				homes). Object that the Local Plan provides no detailed breakdown of dwellings in Galmpton. Development areas should be assessed for potential health risk. Need to improve road infrastructure before new development is permitted.	SC1 requires a Health Impact Assessment from developments that are likely to have an impact on health.
829357	GI2	Mrs. J Collinge	Object to: SS1, SS4, SS5, SS6, SS11, H5 SB1, SDB2, SDB3, TA1.	Regular traveler occupation at Galmpton- the Council should cooperate with other Devon authorities to identify sites Housing targets in Churston are not justified by evidence of available land Various transport improvements around Churston are suggested: complete dualling of Western Corridor, reduce rat running through Bascombe Road and manage traffic generation at Grammar School, provide integrated rail link across Torbay. Jobs total is too optimistic – does not take into account business failures and reduction in public sector employment. Inadequate transport	See response to Churston Galmpton and Broadsands Community Partnership and Paignton Neighbourhood Forum on overall growth levels. The representation raises issue of travellers at Galmpton, although does not propose that a site for travellers within Galmpton/Churston/Broadsands be identified. Torbay is participating in the Devon Traveller Accommodation Assessment (RRR Consultancy Limited, forthcoming). Strategic transport improvements for Brixham are mentioned at 5.3.4 4.3.17 (SS6) Reference to the need to reduce rat-running as noted above.

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-	-	-	-	Editorial clarification	All square metre area measurements should read Sq m (or M ²) and not metres squared (M ²)
				infrastructure. Should lead to reduction in jobs and housing numbers.	
Private Individuals - Brixham					
847295	B1	John Robinson	Object to: SDB2,	Object to development on Oxen Cove and Freshwater Quarry. Plan is unsound for proposing this. Loss of car parks close to waterfront will harm tourism and visitor spend. (Mr Robinson refers to survey evidence backing this view). Wishes to appear at EiP	Concerns about parking noted. There is a need to consider the need for parking against regeneration and other considerations. Details of developments will come through Neighbourhood Plan. However proposals do not preclude parking being retained at the sites (e.g. as part of multi storey developments).
366378	B2	Brian Harland	Object to: SS1, SS8, SS11, H2, C2	Object to growth strategy in the Plan- will destroy tourism appeal. Sites should be required to provide 30% affordable housing. Torbay is too small to be a viable Local Authority	Issues noted- see response to Paignton Neighbourhood Forum and others. The size of the Local Authority Area is beyond the scope of the Local Plan. However, cross boundary links could be relevant at review of the Local Plan in terms of land availability and cross-boundary relationships. These will be addressed as part of the five year review of the Local Plan. The low job density is likely to be more a result of Torbay's poor economic profile (which the Plan seeks to address) rather than local authority boundaries per se. See Modifications to the Plan (above) to protect biodiversity and landscape.
673768	B3	Mr Colin Chandler	Object to: SS1, SDB1, SS11	Policy SDDDB1 can only rely on windfalls if these windfalls do not have environmental, waste water etc constraints.	See response to Paignton Neighbourhood Forum and others on overall growth levels. Policy H1 (p127) lists a range of criteria that development must adhere to. Therefore there is no presumption that all brownfield development will be approved if not sustainable within the criteria in H1.