**TORBAY LOCAL PLAN**

A landscape for success:

The Plan for Torbay – 2012 to 2032 and beyond

PROPOSED SUBMISSION PLAN (FEBRUARY 2014)

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

**REPRESENTATIONS BY PERSON/ORGANISATION**

**Torbay Council – 22 April 2015**

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

**Summary of this document**

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

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

A separate Schedule of responses in order of Modification number has been produced.

**Summary of Representations to Proposed Main Modifications**

**Background**

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

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

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

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

**Responses Received on the Proposed Main Modifications**

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

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

* Objections to growth levels from Paignton Neighbourhood Forum and others. This includes a detailed assessment of the 2012 based household projections, and infrastructure/ environmental capacity (Principally MM1 and Policy SS1).
* Objections by the three Neighbourhood Forums about Modifications for the Council to prepare site allocation plans should neighbourhood plans not be submitted by October 2015 (Principally MM2).
* Objections by Natural England about the likely significant impacts of additional sites identified in the Main Modifications both in terms of greater horseshoe bats ((South Hams Special Area of Conservation) and impact on the candidate Marine Special Area of Conservation. The Council is in discussion with Natural England and has commissioned additional ecological work to assess whether these objections can be overcome (Principally MM1and MM3, Policy SS1 and SS2). .
* Objections to the identification of Steps Cross, Torquay as a potential housing site on the basis of loss of recreation facility, traffic impact and effect on nearby schools. (145 emails/letters and a petition with 75 signatures). The Council has discussed this matter with Sport England and colleagues in Residents and Visitor Services. It is considered that investment in the nearby King George V playing fields can address NPPF paragraph 74 issues relating to Steps Cross (MM9 and MM14).
* Objections to the identification of land south of White Rock as a Future Growth Area from organisations and individuals, on the basis of landscape, ecology, transport and the implications of the 1997 Secretary of State’s Decision, which was considered by many to remain relevant (91 letters as well as comments by organisations such as Natural England). Some house builders argued that Collaton St Mary is a less constrained area for additional growth. There were also some comments from house builders about the deliverability of development on car parks (Principally MM3).
* Support for the identification of St Marys Campsite, Brixham as a potential housing site. However, objections have been received from environmental organisations (including Natural England) about harm to greater horseshoe bats. This is also reflected in further work on the Council’s Site Assessment HRA (Principally MM14).

**Broad Conclusions on the Implications of Representations Received**

Basis for conclusions

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

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

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

Possible ways forward in relation to housing growth

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

If the Inspector is minded to explore further the potential offered by White Rock, in order to maximise opportunities to meet the 10,000 homes target sooner rather than later, an option could be to retain the proposed Future Growth Area extension into land south of White Rock but on a more restricted site area. This is illustrated on the Plan in Appendix 1. This would correspond only to the area being actively promoted by Abacus / Deeley Freed and within the developer’s control (Phase 1). The Council believes, however, on the basis of advice to date, this option to be less than satisfactory. This is because it may be at risk of challenge due to the likely environmental impacts of such development, and lack of certainty about the extent of mitigation in compensation for such impacts. Such a challenge could in turn undermine adoption of the new Local Plan.

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

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

Council’s preferred approach

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

This approach would allow the Plan, with the inclusion of other acceptable sites put forward by the Council in the Main Modifications consultation document, to provide for 9430 new homes (i.e. 8950 plus some previously ‘excluded’ sites) during the Plan period. A full review of the Plan, in 5 years, would include an assessment of the potential offered for further growth by the inclusion of land south of White Rock, building on the work already undertaken and expanding that work in the meantime, particularly through the collection of additional critical ecological evidence. Sufficient land is committed within the Plan to maintain a rolling five year supply of housing. This is the approach that the Council wishes the Inspector to take forward to his Final Report.

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

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

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

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

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

As indicted in the schedule below, discussions are ongoing with Natural England, Kestrel Wildlife Consulting Ltd and the Council’s Urban Design officer and drainage engineers about the extent to which Natural England’s objections could impact on the possible development of land **South of White Rock.** However it is clear that further evidence on the likely impact on ecology and agricultural land will be required before the site south of White Rock can be allocated for development in the Local Plan.

It is recommended that the greenfield land at **St Marys Campsite, Brixham** is deleted as a pooled housing site due to likely impact on greater horseshoe bats (and the South Hams SAC).

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

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

**What happens next?**

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

| **Representations on Main Modifications** \* Objections unless otherwise stated |
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| **ID** | **File No.**  | **Person /Organisation Consultee** | **Modification/****Policy No.**  | **Summary of Representations Made** | **LPA Response**  |
|  |
| **Partner organisations** |
| 843212 | P1 | Torbay Coast and Countryside Trust | MM1MM3MM12MM14SS1, SS2, SDB1 | Concern that 10,000 dwellings will result in loss of greenfield sites, especially White Rock and St Marys. Impact on greater horseshoe bats and cirl buntings. Loss of recreation/green space. | Objections to land South of White Rock are noted. Please see response below to Natural England’s comments and more detailed assessment in the schedule of representations by Modification/Policy Number  |
| 438366 | P2 | South Devon AONB Partnership  | MM3 MM14SS2, SDB1 | Object to inclusion of White Rock and St Marys campsite: impact to AONB and rural setting. If sites are to be allocated there would need to be a comprehensive assessment of impact on the AONB. | Objections to land South of White Rock are noted. Please see response below to Natural England’s comments and more detailed assessment in the schedule of representations by Modification/Policy Number. Abacus has submitted a detailed landscape assessment as part of their representations. This is being assessed by the Council’s Urban Design Officer to consider whether this meets the Landscape and Visual Impact Assessment requirements.  |
| **National organisations** |
| 843585 | NO1 | Environment Agency  | MM10/MM14 General observation SDB1, SDB2 | Overall support. Mention the need for flood defence (from wave action) at Paignton Harbour, Victoria Car Park and Station Lane. | Overall support noted. Make a further Additional Modification to refer to the need to protect from flood risk arising from wave action in SDP1/paragraph 5.1.2.3. |
| 400188 | NO2 | Natural England | SA/HRAMM1MM3, MM9, MM10, MM11, MM14 obj Concomitant comments on AM17,19,29, 30, 34 ,64, 70,76,99, 100, 104, 113, 116, 119, 120, 121,122,124, 156, 163, 167, 171, 177SS1, SS2, SDT1, SDP1, SDB1 | Insufficient consideration of in-combination effects of additional sites. Concerns about White Rock (biodiversity, agricultural land etc), St Marys, Churston Golf Club, Sladnor Park. Concerns about impact of Combined Sewer Overflows on Marine candidate SAC.AM29, 30, and 34,64,70 (safeguards within environmental polices etc) should be Main Modifications, as they go to the heart of the Local Plan. | The Council have commissioned Greenbridge Ltd (M J Oxford, formerly Kestrel Wildlife Ltd) to assess the in-combination HRA impacts of the new sites raised by Natural England. More detailed discussion is set out in the companion schedule of Representations to Main Modifications by Modification/Policy Number. However the Council considers that that further evidence on the likely impact on ecology and agricultural land will be required before land south of White Rock can be allocated for development in the Local Plan. It is recommended that the greenfield land at **St Marys Campsite, Brixham** is deleted as a pooled housing site due to likely impact on greater horseshoe bats (and the South Hams SAC). The Council considers that **Sladnor Park, Maidencombe**  and **Churston Golf Club, Churston**  appear to be developable in principle and should be retained in the pool of sites in Appendix D of the Submission Local Plan for identification by Neighbourhood Forums for inclusion in Neighbourhood Plans. **Whether environmental safeguards should be treated as Main Modifications**The Council made significant modifications to the Submission Version of the Local Plan to seek to overcome Natural England’s initial concerns (specifically to Policies SS8, NC1, ER2 and W5). The Inspector’s Further Findings (paragraph 6) indicated that Main Modifications should only relate to matters which go to the heart of the Plan, and that many of these changes could be considered as additional modifications. The Council has sought to follow this advice.  |
| 501495 | NO3 | Sport England  | MM14 Object SDT1 | Object to inclusion of Steps Cross as a possible future housing site. Fails to meet tests in NPPF 74 and Sport England’s Playing Fields Policy. Support AM139 and AM150 | Steps Cross is identified in the Torbay Playing Pitch Strategy as being substandard. Discussions have taken place between Sport England and the Council’s Residents’ and Visitor Services. These have confirmed that the Playing Pitch Strategy would support tying in development of Steps Cross playing field with investment in the nearby King George V playing fields ( East of Teignmouth Road, 250 metres from Steps Cross), to achieve an overall improvement in provision. On this basis development could meet the tests in NPPF paragraph 74.  |
| **Neighbouring Local Authorities, Neighbourhood Forums, Community Partnerships, Parishes and Amenity Societies** |
| 438382 | AFC 1  | South Hams District Council  | MM2, MM10, MM11SS2, SDP1, SDP3 | Concern that under utilisation of Collaton St Mary’s potential will place pressure on more sensitive sites. South of White Rock is sensitive in terms of the AONB and LEMP for phase 1 of the White Rock development. There is limited capacity in South Hams to accommodate overspill growth from Torbay.  | **Collaton St Mary**Collaton St Mary has been the subject of detailed Masterplanning. The Masterplan has assessed the landscape impact of development. It is noted that the strongest developer interest relates to the North of Totnes Road, which some objectors consider to be the more sensitive in landscape terms. Whilst detailed schemes **may** demonstrate higher numbers of dwellings are achievable without causing undue landscape or greater horseshoe bat/biodiversity impact; Torbay Council has not received evidence to show how this could be achieved. On this basis it considers that the capacity identified in the Masterplan is the most justifiable figure, based on the available evidence. The Council does not consider it is appropriate to increase the housing requirement at Collaton St Mary simply because of sensitivities at land south of White Rock. Each site should be considered on its merits and the extent to which development impacts can be mitigated. **Land South of White Rock** Objections to land South of White Rock are noted. Please see response below to Natural England’s comments and more detailed assessment in the schedule of representations by Modification/Policy Number. |
| 900125 | AFC2 | Dittisham Parish Council Dr Annette Thom | MM3 General observationSDP3 | Request that road infrastructure be improved to anticipate demand arising from White Rock.  | Issue noted. If development were to proceed at land south of White Rock, highway impacts would need to be addressed through S106/S278 agreements. However, as noted above, there are other issues affecting the site that need to be addressed prior to any development taking place.  |
| 418700 | AFC3 | Stoke Gabriel Parish Council  | MM1, MM2, MM3, MM4, MM5, MM6, MM7, MM8,MM10, MM14.SS1 etc, SS2, SDP3 | Endorse Paignton Neighbourhood Forum’s objections (Q.V.) Object to MM3 land south of White Rock- landscape, ecology, transport impact, loss of agricultural land, light pollution and effect on Stoke Gabriel.  | See response to Paignton Neighbourhood Forum’s comments below. Objections to land South of White Rock are noted. Please see response below to Natural England’s comments and more detailed assessment in the schedule of representations by Modification/Policy Number. |
| 468630 | AFC4 | Kingswear Parish Council  | MM3 object SS2, SDP3 | Object to land south of White Rock- encroachment into open countryside.  | Objections to land South of White Rock are noted. Please see response below to Natural England’s comments and more detailed assessment in the schedule of representations by Modification/Policy Number. |
| 817474 | AFC5 | Torquay Neighbourhood Forum  | MM2, MM7 MM8, MM9 MM12, MM14SDS12SS12SDT1 | Object to Masterplans being formalized as planning policy outside of the Neighbourhood Plan process. Object to the Council taking over site allocation (preparing DPDs) if the Forum is unable to meet the deadline of October 2015. May 2016 is a more reasonable deadline. Future development sites should be determined through the Neighbourhood Plan. Object to additional housing sites- these have not been independently assessed and are potentially unsound.  | **Objection to site allocation outside of the Neighbourhood Plan**The additional sites identified in MM9-11 and MM14 are part of the pool of sites from which the Neighbourhood Plans should draw sites for inclusion in Neighbourhood Plans. The additional sites (in MM14) have been assessed by the Council and subjected to SA. They are not necessarily a definitive list but are based on sites identified in the SHLAA. It is acknowledged that there is limited headroom to omit particular sites, but some scope does exist particularly if alternative deliverable sites are identified by the Neighbourhood Forums. **Deadline for Neighbourhood Plan Submission.** The Inspectors’ Initial Findings (para 8 ) and Further Findings (para 7) indicate that a trigger point should be set out for commencement of site allocation plans, to avoid a potential policy vacuum in 2017. The Modifications have sought to address this issue (see also MM7 and MM8 below). Torquay Neighbourhood Forum’s suggestion that the deadline for Neighbourhood Plan submission to the Council be extended to June 2016, to allow time for preparation, is a constructive one. There is a good and agreed evidence base, reasonable progress on Neighbourhood Plan preparation and a clear pool of identified sites. On this basis the Council believes that Site Allocation DPDs could be brought forward more speedily than if starting from scratch.The five year housing land supply position is monitored on an annual basis and it appears that some development in Future Growth Areas will come forward before 2023, provided that infrastructure issues are addressed. Masterplanning is nearly complete at Torquay Gateway/Edginswell (SS2.1 and SDT3) and the area is expected to come forward before 2023 (so will be included in the 5 year supply stock at 2017). On this basis it is considered that the deadline for submission of Neighbourhood Plans may be extended to 31st March 2016 without risking a policy vacuum in 2017, or undermining the Council’s 5 year housing land supply position.  |
| 704914 | AFC6 | Paignton Neighbourhood Forum  | MM1, MM2, MM3, MM4, MM5, MM6, MM7, MM8, MM10, MM14.Concomitant objections to AM23, AM74, AM129, AM130, AM169, AM178. SS1 etcSS12SDP1SDP3 | Object to housing rates in excess of 8,300 dwellings. Growth rate not justified by evidence of need- 2012 based HH projections are lower than 2011 based ones. 2012 population projections show above trend rate of inwards migration and are therefore a “policy on” figure which account for economic recovery. Object that the Local Plan is not jobs le, but seeks to front-load housing inspite of evidence of past oversupply of housing which has sated the housing market. A clearer jobs led approach should be taken in the Modifications. Growth cannot be accommodated within environmental/ infrastructure capacity (especially drainage capacity). Plan is not jobs led, but housing led: there should be a clearer linking of housing and job numbers. Object to mechanism to produce site allocation documents if Neighbourhood Plans are not submitted by 2015: NPPF requires only 10 year housing provision. Objections and recommended amendments to a number of Additional Modifications.   | **Overall Strategy**Paignton Neighbourhood Forum’s concerns about the level of growth and assessment of full objectively assessed need are noted. These have been discussed in the Council’s Growth Strategy and Capacity for Change Topic Paper (SD24) and the Housing Requirements Topic Paper (PBA 2013, SD56). It is noted that the 2012 based (2015) Household Projections are lower than the Interim 2011 Based Household Projections, and the Council is grateful to the Forum for their analysis of these. However, the Council accepts the Inspector’s Initial Findings view that FOAN will be higher than the household projection figure if economic growth is achieved, as per the Housing Requirements Report. **Plan is not jobs led.**Paignton Neighbourhood Forum’s argument that the Plan should be jobs led is well documented in other documents. The Local Plan seeks to provide jobs and sets out an ambitious strategy for economic growth (E.g. Policies SS1 and SS5). The Plan also undertakes to monitor the creation of jobs as part of annual and five yearly reviews. This could allow a downwards estimation of FOAN should jobs growth is not realized. While the Council is highly supportive of the need to improve economic prospects, Officers do not believe that there is a justification in the NPPF to implement rigid limit on new homes until new jobs are created. Nor would this approach be conducive to economic growth. **Environmental Capacity** The Council agree that environmental capacity is a critical issue. See response to Natural England above. The Submission Local Plan and Proposed (Additional) Modifications seek to address sewerage capacity through sustainable drainage measures. See response to Torquay Neighbourhood Forum on the deadline for submission of Neighbourhood Plans. However the Local Plan does require neighbourhood Plans to make site allocations (of sites within the pool in Appendix D of the Local Plan and SS1/or other sites as identified by the Forum). |
| 828890 | AFC7 | Brixham Neighbourhood Forum  | MM1MM3MM9 GobMM12MM14SS1 etc SS12SDB1 | Object to growth levels –endorse Paignton Neighbouhood Forum’s assessment of FOAN.2012 Household Projections are lower than 2011 based ones. Object to increase in housing umbers in Brixham Peninsula. Greater level of masterplanning is needed to assess scope for growth e.g. as per Collaton St Mary Object to allocation of land south of White Rock. (previous S of S Ruling).Object to retention of Golf Club site (not deliverable) and St Marys Bay (need more evidence of environmental impact).  | See response to Natural England and Paignton Neighbourhood Forum above.It is noted that land South of White Rock falls within the Brixham Peninsula Neighbourhood Plan area. Please see response below to Natural England’s comments and more detailed assessment in the schedule of representations by Modification/Policy Number**Developability of Churston Golf Club.** The Council concurs with Natural England’s comments that the 1st and 18th hole site is itself relatively unconstrained, but the difficulty is in identifying a replacement clubhouse and 1st/18th hole site. The Council consider that this issue is not insurmountable in the medium term and it is therefore appropriate to retain the site as a site for identification by the Brixham Peninsula Neighbourhood Plan. **Developability of St Marys Campsite**. Natural England’s, AONB Partnerships and the Coast and Countryside Trust’s, and Brixham Peninsula Neighbourhood Forum’s comments on St Mary’s Campsite are noted. The Council’s own assessment of likely impact on greater horseshoe bats (Greenbridge Ltd (M J Oxford/ formerly Kestrel Wildlife Ltd) indicates that there is likely to be significant impact upon habitats as a result of development on this site. Whilst there were a number of representations in support of the site, no evidence was submitted to indicate how the impacts of development could be mitigated. Consequently it is recommended that the site is not allocated for development and deleted from Appendix D of the Local Plan (with a consequent reduction in numbers by 50 dwellings). The adjacent brownfield industrial site, currently allocated in the Adopted Torbay Local Plan (H1.21) would remain as a potential housing site.   |
| 900169 | AFC8 | Maidencombe Residents Association  | MM9,MM14SDT1 | Object to inclusion of Sladnor Park as a housing site (landscape, ecology, drainage/flooding, impact on village character, transport) | **Developability of Sladnor Park, Maidencombe.**  The importance of greater horseshoe bat habitats is noted. Similarly the site is within a sensitive part of the undeveloped coastal landscape, and located some way from services. However the site has previously gained planning permission for a retirement village (P/2006/0747/MOA and P/2007/1410/MRM), which may have been implemented and, in any case, demonstrates that the site is developable and deliverable.  |
| 843591 | AFC9 | Devon CPRE (Carole Box)  | MM1, MM3, MM14SS1 etcSS2SDB1 | Object to levels of growth above 8,300 dwellings (migration rates, infrastructure,landscape and ecology constraints).Object to designation of land south of White Rock (MM3)- SofS’s 1997 reasons for refusal are still relevant.Object to Churston Golf Club site (MM14)  | Please see response to Paignton Neighbourhood Forum above. Objections to land South of White Rock are noted. Please see response below to Natural England’s comments and more detailed assessment in the schedule of representations by Modification/Policy Number. |
| 844172 | AFC10 | Collaton Defence League and Collaton St Mary Residents Association  | MM1 Obj, etc. MM10 SS1 etcSDP3  | Endorse Paignton Neighbourhood Forum’s objections. Object to level of growth, extent of greenfield land take and lack of infrastructure delivery plan.  | Objections are not directly related to the Modifications, but to the overall growth strategy and the identification of Collaton St Mary as a Future Growth Area. The Proposed Modifications have reduced the proposed number of dwellings at Collaton St Mary in response to the findings of the Collaton St Mary Masterplan. However more detailed assessment of greater horseshoe bat flightpaths, drainage etc will need to be undertaken as part of planning applications/ more detailed assessments building on the Masterplan. The forthcoming Planning Contributions Supplementary Planning Guidance will need to consider infrastructure priorities.  |
| 830233 | AFC11 | Stoke Gabriel Parish Plan Group  | MM3SS2, SDB1 | Object to allocation of White Rock. Impact on Yalberton Valley, AONB, Traffic, Duty to Cooperate matters with South Hams.  | Objections to land South of White Rock are noted. Please see response below to Natural England’s comments and more detailed assessment in the schedule of representations by Modification/Policy Number. |
| 900130 | AFC12 | Watcombe Wanderers Football Club | MM9/MM14SDT1 | Object to identification of Steps Cross as a potential housing site, due to loss of recreational facility and shortage of pitches.  | Steps Cross is identified in the Torbay Playing Pitch Strategy as being substandard. Discussions have taken place between Sport England and the Council’s Residents’ and Visitor Services. These have confirmed that the Playing Pitch Strategy would support tying in development of Steps Cross playing field with investment in the nearby King George V playing fields (East of Teignmouth Road, 250 metres from Steps Cross), to achieve an overall improvement in provision. On this basis development could meet the tests in NPPF paragraph 74. |
| **Business Sector/Organisations/Social Enterprise Sector** |
| 900132 | B1 | Watcombe Childrens Centre Nursery (Nik Salter) | MM9, MM14SDT1 | Object to Steps Cross: Impact on recreation, transportation, education.  | See response above in relation to Sport England, Watcombe Wanderers FC. It is noted that the playing field is close to three schools, but is not part of the formal playing fields used by the schools.  |
| 847469 | B2 | South West HARP Planning Consortium  | MM1MM7AM129SS1, H2 | Object to 10,000 dwelling figure- does not meet full objectively assessed need. SHMA should be renewed. Object to the change to affordable housing threshold being changed as an additional modification.  | The affordable housing threshold was raised in response to changes to the PPG. The Council’s legal advice was that the Local Plan should comply with the PPG requirements on affordable housing. The Suggested Changes to the Local Plan (November 2014) noted that *“the government is considering introducing a minimum threshold for affordable housing of 10 dwellings. If this comes into effect the 3-10 dwelling threshold for affordable housing will drop away***”.**On this basis it is not considered to be a Main Modification. The calculation of full objectively assessed need has been examined in detail at the Examination Hearing and through written submissions. The Council accepts the need for affordable housing. Delivery is constrained by viability as well as environmental capacity. The overall level of growth is limited by Torbay’s environmental capacity as noted above. This makes it impractical to increase housing numbers in order to achieve a greater level of affordable housing provision.  |
| **Development Industry - Housing** |
| 844154 | HB1 | Homebuilders Federation  | MM1MM7MM14AM129, AM135, AM104, AM144, AM155SS1 etcSDT1, SDP1, SDP1 | Object to MM1: it should state at least 10,000 dwellings and set out how shortfall below FOAN can be met. Object that 5 year supply cannot be met (when taking backlog into account) which renders the Local Plan unsound. MM14- Object to inclusion of car parks- their delivery is uncertain Comments on AMs: There is a need to ensure that no additional burdens are placed on developers by the additional modifications and other revisions that may be made to bring into the Plan into line with PPG.  | **Five Year Supply issues** The achievability of housing levels will be limited by Torbay’s environmental constraints, as noted above and in the schedule of representations by Modification/Policy Number. Once an objectively assessed need figure has been finalized, the Council agrees that any shortfall will need to be met within five years (final paragraph of PPG 3-025). On the Council’s assessment this would be between 13-20 dwellings based on the Plan Starting Point of 2012.(see separate schedule of Representations by Modification/ Policy number. The Council would be able to maintain a five year supply of housing on this basis. It is noted that the PPG 3-025 penultimate paragraph suggest that a long term view of local delivery is taken. As pointed out in Paignton Neighbourhood Plan’s evidence, delivery between 2001-11 significantly exceeded population and household growth and counts as over delivery (PPG3-036)The Council agree that if full objectively assessed need cannot be met within Torbay, there will be a need to discuss with neighbouring authorities whether they are able to accommodate un-met need. However this will not arise before at least 2023 based on the stock of developable sites identified in the Local Plan and SHLAA. **Deliverability of Car Park Sites** Car parks are identified within the pool of sites for designation within Neighbourhood Plans and will not be included within five year supply until their deliverability has been established, and it is clear that sufficient car parking can be retained. However they are likely to be sustainable brownfield sites in the built up area. As noted above, the Council is able to maintain a five year housing land supply based on existing commitments and developer interest in future growth area sites. **Additional Burdens-** see also schedule of Additional Modifications The Submission Plan has been subject to a whole plan viability testing study (PBA 2014). The bulk of the additional modifications are necessary to meet HRA requirements. The Council agree that additional viability testing will be needed if it wishes to make dwelling sizes mandatory. Viability will also be a critical consideration in the CIL Charging Schedule and Planning Contributions SPD. |
| 844351 (agent)844178(consultee) | HB2 | Richmond Torquay (Jersey) Limited (PCL Planning on behalf of) | MM7 SupMM17SDT1 | Support MM7 Support principle of allocation of Sladnor Park, Maidencombe, but could accommodate more than 25 dwellings without breaching environmental limits.  | **Sladnor Park, Maidencombe** The importance of greater horseshoe bat habitats and the landscape importance of the site are significant constraints. As noted above, the Council considers that development can be achieved without harm to greater horseshoe bats or the County Wildlife Site. Sensitive development may help to enhance the site’s biodiversity value. However detailed site assessment will need to be carried out as part of any subsequent planning application, to establish the site’s capacity, necessary biodiversity etc and mitigation measures. Without this information, the Council do not consider it would be appropriate to increase the assessed yield above 25 dwellings.  |
| 844351 (agent)844349 (consultee) | HB3 | Waddeton Park Limited (PCL Planning on behalf of).  | MM1, MM3 MM5, MM7. MM11 AmendSS2.3, SDP3 | Support increase in housing numbers to 10,000. This should be the minimum requirement.Request extension of Future Growth Area SS2.3/SDP3.4 to the west of area. (see application P2014/0983) | Waddeton Park Ltd’s objection does not relate to a Modification but calls for an extension to the boundary of the Future Growth Area. The site is currently the subject of a planning application (P/2014/0983)). The Council do not object in principle to the extension of the Future Growth Area, with the important caveat that any proposal will need to make provision for biodiversity mitigation and landscaping. On this basis, development is unlikely to be acceptable on the entire Future Growth Area. This principle is already set out in Policy SS2 of the Local Plan. |
| 844316 (agent)844315 (consultee) | HB4 | Taylor Wimpey (Origin 3 on behalf of)  | MM1 SupportMM3MM5, MM10, MM11, MM12, MM14SS2, SDP1 SDP3, SDB1 | Support increase in housing numbers to 10,000 dwellings.Object that housing numbers have been reduced in Collaton St Mary (MM11/SDP3). Collaton St Mary is less constrained than sites in the south of Torbay, including White Rock. It is more deliverable than car park sites.  | Collaton St Mary has been the subject of detailed Masterplanning. The Masterplan has assessed the landscape impact of development. It is noted that the strongest developer interest relates to the North of Totnes Road, which some objectors consider to be the more sensitive in landscape terms. Whilst detailed schemes **may** demonstrate higher numbers of dwellings are achievable without causing undue landscape or greater horseshoe bat/biodiversity impact; the Council has not received evidence to show how this could be achieved. On this basis it considers that the capacity identified in the Masterplan is the most justifiable figure, based on the available evidence. The Council does not consider it is appropriate to increase the housing requirement at Collaton St Mary simply because of sensitivities at land south of White Rock. Each site should be considered on its merits and the extent to which development impacts can be mitigated.  |
| 844198 (agent)791437 (consultee) | HB5 | Bloor Homes (South West) Ltd. (Boyer Planning on behalf of).  | MM1 Sup/objMM2MM3MM4, MM5, MM10, MM11, MM12, MM14SS1, SS2, SDP3, SS8, NC1 | Support increase in housing numbers to 10,000 dwellings. But object that this figure is below FOAN. Object to reliance on car parks and windfalls.Need to make up for past undelivery by bringing forward development in Future Growth Areas.Object to reduction of housing numbers at Collaton St Mary. Bloor Homes’ site at Collaton St Mary has capacity for 160 dwellings. Reducing numbers will harm viability.Object to designation of land south of White Rock: area has greater constraints than Collaton St Mary. Churston Golf Club site is “considered to have no capacity for housing development”. Car parks cannot be relied on for housing land as delivery is uncertain, flooding and other constraints.  Greater horseshoe bat mitigation should be required on a case by case basis and not all Future Growth Areas.  | See response to Home Builders Federation in relation to objectively assessed need and identification of car parks.See response above in relation to Taylor Wimpey with respect to capacity for growth at Collaton St Mary. **Land South of White Rock** See discussion above and in separate Schedule of Representations by Modification/Policy Number on land south of White Rock.**Developability of Churston Golf Club**The Council concurs with Natural England’s comments that the 1st and 18th hole site is itself relatively unconstrained, but the difficulty is in identifying a replacement clubhouse and 1st/18th hole site. The Council consider that this issue is not insurmountable in the medium term and it is therefore appropriate to retain the site as a site for identification by the Brixham Peninsula Neighbourhood Plan. The Modifications with regard to greater horsehoe bat mitigation have been the subject of extensive negotiations with Natural England. In any event Collaton St Mary has been identified as within the greater horseshoe bat flyway, and the need to maintain and enhance these has been identified by Natural England and the Council’s HRA.  |
| 844863(agent)844862(consultee) | HB6 | Abacus (Stride Treglown for).  | MM1,MM2, MM3, MM8 Support MM3, AM16 and AM19: minor clarification. SS2, SDB1 | Support increase in housing numbers in MM1. Support designation of land South of White Rock as a Future Growth Area Detailed Land Promotion Report submitted in support of the proposal, setting out landscape, ecology etc matters. Suggests that 328 dwellings and 3-3,500 sq m of employment/retail space can be achieved.  | Note that this site is slightly smaller than the Future Growth Area and is similar to the SHLAA site T756b. Land south of White Rock is likely to be the only strategically significant site with capacity to significantly increase the level of housing above the 9,240 identified in the Submission Local Plan. The previous Secretary of State’s decision (from 1997) is noted. In addition, paragraphs 115-116 of the NPPF Indicate that great weight should be given to conserving landscape and scenic beauty in AONBs.Abacus has provided a Land Promotion Study setting out landscape and biodiversity evidence in support of development on this site. It is noted that that the site they have commented on at the Proposed Modifications stage is smaller than the site they previously promoted (corresponding to SHLAA site T756b, but excluding T739 to the south (north of Galmpton). This area is sets out around 328 dwellings (as opposed to 460 in MM3) The Land Promotion Study contains a detailed landscape assessment (by Stride Treglown) and bat survey (Ecosulis). However the Council’s HRA advice on greater horseshoe bats (from Greenbridge Ltd /M J Oxford/ Kestrel Wildlife) is that further assessment beyond the Ecosulis Bat Activity Survey is needed to establish whether there is a likely significant effect on the SAC. No evidence has (currently) been put forward on the loss of agricultural land/ soil quality, which is also part of Natural England’s objection. In the Council’s view, the promoted northern area’s potential would need to be tested further before the site could be allocated. It may be suitable for longer term allocations when additional assessments have been carried out. However objectors to the allocation have raised legitimate matters that would override the presumption in favour of sustainable development. No evidence has been put forward about the southern part of the site (10 hectares corresponding to SHLAA site T739). Some of the representations raised concerns about the coalescence of Galmpton with development on the Brixham Road. Deleting the southern site from the Future Growth Area would mitigate this impact.  |
| **Private Individuals – Torquay (excluding Steps Cross)** |
| 638322 | TI1 | Nigel  | Davies | MM9, MM14 Obj | Object to Sladnor Park. Remoteness, transport, lack of schools, environmental impact- site used as landfill in the past.  | See response above with regard to Sladnor Park’s biodiversity. The Council agree that it is not particularly close to services. However Teignmouth Road is served by the no. 11 bus service and the site has recently had planning permission. On this basis it is considered suitable for development subject to wildlife and landscape matters being satisfactorily addressed.  |
| 845042 | TI2 | Anthony  | Garlick | MM9 MM14 | Redstones, Cockington should be a housing site, as it is less sensitive than other alternative sites.  | The issue has been considered in the Council’s responses to the proposed Submission Local Plan. Redstones is the subject of enforcement action. In any event the site does not have capacity for 6+ dwellings and any development would be treated as a small windfall.  |
| 900074 | TI3 | Kathy  | Uglow (K Luxton) | MM9/MM14 | Object to inclusion of Chilcote Close- Loss of privacy, trees, Conservation area, parking and right of way issues.  | It is considered that the issues identified can be overcome through design and conditions protecting trees and residents’ rights of way. The site is within the Pool of sites from which Torquay Neighbourhood Forum will need to identify development land. Maintenance of sufficient parking, tree issues and rights of way will need to be addressed before development can commence.  |
| **Private Individuals –Steps Cross, Torquay** |
| Online petition with 75 signatures and 146 individual email/letters of objections to the designation of Steps Cross as a potential housing site (MM9/MM14; SDT1 and SDT 3)  | Reasons for objection include the impact the proposed development will have on the landscape, severe impact on traffic in the neighbourhood which is already overcrowded. Impact on dangerous junctions. Loss of recreational amenities, both formal playing field and informal recreation area. Proximity of schools in the area . Impact on setting of Brunel Park. Lack of facilities (schools are over stretched). Impact on deprivation in the Watcombe area. It is argued that more suitable brownfield opportunities can be found.  | **Steps Cross, Watcombe** The high level of objections is noted. The proposal would result in the loss of an informal recreation area. However the playing pitch is identified in the Torbay Playing Pitch Strategy as being substandard. Discussions have taken place between Sport England and the Council’s Residents’ and Visitor Services. These have confirmed that the Playing Pitch Strategy would support tying in development of Steps Cross playing field with investment in the nearby King George V playing fields ( East of Teignmouth Road, 250 metres from Steps Cross), to achieve an overall improvement in provision. On this basis development could meet the tests in NPPF paragraph 74. Objections have been raised on the grounds of congestion, and the busy junction with Teignmouth Road. However, it is considered that impacts could be satisfactorily ameliorated. The site is identified in Appendix D of the Local Plan as a site for allocation in Neighbourhood Plans, as noted above. |
| 899378 | SC1 | Nicola  | Hall | MM9/MM14 | Online petition objecting to Steps Cross submitted via Change.Org | See response above. |
| 898918 | SC2 | M  | Adams | MM9/MM14 |  | See response above. |
| 828928  | SC3 | Mr P D  | Aggett | MM9/MM14 |  | See response above. |
| 898929 | SC4 | Miss Lee  | Allen | MM9/MM14 |  | See response above. |
| 898930 | SC5 | Mr & Mrs G H (letter) | Antieul | MM9/MM14 |  | See response above. |
| 898931 | SC6 | David & Jacqueline  | Appleby | MM9/MM14 |  | See response above. |
| 898932 | SC7 | Peter | Archer | MM9/MM14 |  | See response above. |
| 898933 | SC8 | Craig  | Axford | MM9/MM14 |  | See response above. |
| 898934 | SC9 | Salt  | Barnes | MM9/MM14 |  | See response above. |
| 898712 | SC10 | Suzanne  | Beasley | MM9/MM14 |  | See response above. |
| 898940 | SC11 | Kevin  | Begley | MM9/MM14 |  | See response above. |
| 898942 | SC12 | W E & J  | Bell | MM9/MM14 |  | See response above. |
| 898944 | SC13 | Marilyn  | Bennion | MM9/MM14 |  | See response above. |
| 898946 | SC14 | Carole  | Benton | MM9/MM14 |  | See response above. |
| 898948 | SC15 | Janet  | Bestwick | MM9/MM14 |  | See response above. |
| 898950 | SC16 | Shaun, Mandy Ian & Laura  | Biddle | MM9/MM14 |  | See response above. |
| 898951 | SC17 | Mr C E (letter) | Brokenshire | MM9/MM14 |  | See response above. |
| 898952 | SC18 | Chris & Dave  | Bullen | MM9/MM14 |  | See response above. |
| 898956 | SC19 | David & Debbie  | Cadwallader | MM9/MM14 |  | See response above. |
| 898957 | SC20 | Joanna  | Cannings | MM9/MM14 |  | See response above. |
| 899021 | SC21 | Samantha  | Chammings | MM9/MM14 |  | See response above. |
| 899025 | SC22 | E M & R G (letter) | Cole | MM9/MM14 |  | See response above. |
| 899380 | SC23 | Colin  | Cook | MM9/MM14 |  | See response above. |
| 899029 | SC24 | Debbie  | Cooper | MM9/MM14 |  | See response above. |
| 899123 | SC25 | Karen  | Cousins | MM9/MM14 |  | See response above. |
| 899032 | SC26 | Mrs P M & Mr B L  | Cripps | MM9/MM14 |  | See response above. |
| 899034 | SC27 | Andrew  | Critchlow | MM9/MM14 |  | See response above. |
| 899036 | SC28 | Chelsea  | Crofts (?) | MM9/MM14 |  | See response above. |
| 899040 | SC29 | Cllrs. Steve & Roger | Darling & Stringer | MM9/MM14 |  | See response above. |
| 899225 | SC30 | Richard & Andrea  | Davies | MM9/MM14 |  | See response above. |
| 899044 | SC31 | Robert  | Day | MM9/MM14 |  | See response above. |
| 899045 | SC32 | Yemaya  | Design | MM9/MM14 |  | See response above. |
| 899046 | SC33 | Mr & Mrs L (letter) | Dodson | MM9/MM14 |  | See response above. |
| 899049 | SC34 | William & Susan  | Edmund | MM9/MM14 |  | See response above. |
| 899051 | SC35 | Glynis  | Elliott | MM9/MM14 |  | See response above. |
| 899056 | SC36 | Mr D  | Ellis | MM9/MM14 |  | See response above. |
| 899058 | SC37 | Mrs Jackie | Fauset | MM9/MM14 |  | See response above. |
| 899062 | SC38 | Mrs Margaret  | Firth | MM9/MM14 |  | See response above. |
| 899384 | SC39 | Mr G  | Fletcher-Frost | MM9/MM14 |  | See response above. |
| 899065 | SC40 | Peter  | Foxon | MM9/MM14 |  | See response above. |
| 899063 | SC41 | Debbie & Paul  | Freer | MM9/MM14 |  | See response above. |
| 899066 | SC42 | Greg  | Frost | MM9/MM14 |  | See response above. |
| 899068 | SC43 | Tim  | Gawn | MM9/MM14 |  | See response above. |
| 899069 | SC44 | Stephanie  | Glasper | MM9/MM14 |  | See response above. |
| 899390 | SC45 | Peter John  | Godber | MM9/MM14 |  | See response above. |
| 899071 | SC46 | Mrs Barbara  | Hanford | MM9/MM14 |  | See response above. |
| 899073 | SC47 | S P & Ryan (letter) | Harris | MM9/MM14 |  | See response above. |
| 899074 | SC48 | Mr & Mrs C M (letter) | Harris | MM9/MM14 |  | See response above. |
| 899076 | SC49 | Katrina  | Harris-Byrne | MM9/MM14 |  | See response above. |
| 899077 | SC50 | Pete  | Harris-Byrne | MM9/MM14 |  | See response above. |
| 899078 | SC51 | Martin  | Hayman | MM9/MM14 |  | See response above. |
| 899080 | SC52 | Sarah  | Haywood | MM9/MM14 |  | See response above. |
| 899081 | SC53 | Maria & Adrian  | Head | MM9/MM14 |  | See response above. |
| 899085 | SC54 | Paul  | Hellyer +6 others | MM9/MM14 |  | See response above. |
| 899088 | SC55 | Donald  | Hesketh | MM9/MM14 |  | See response above. |
| 899089 | SC56 | Mr Robert  | Hibell | MM9/MM14 |  | See response above. |
| 899090 | SC57 | Ms J  | Hickley | MM9/MM14 |  | See response above. |
| 899091 | SC58 | John  | Hockin | MM9/MM14 |  | See response above. |
| 899092 | SC59 | Ann  | Horner | MM9/MM14 |  | See response above. |
| 899093 | SC60 | James  | Horner | MM9/MM14 |  | See response above. |
| 899095 | SC61 | M & H | Humphries | MM9/MM14 |  | See response above. |
| 899094 | SC62 | Mr Robin | Hyde | MM9/MM14 |  | See response above. |
| 899099 | SC63 | Audrey & David (letter) | Jenks | MM9/MM14 |  | See response above. |
| 899101 | SC64 | Paul  | Keen | MM9/MM14 |  | See response above. |
| 899102 | SC65 | Mrs B (letter) | King | MM9/MM14 |  | See response above. |
| 899106 | SC66 | Robin & Sylvia | Lander | MM9/MM14 |  | See response above. |
| 899107 | SC67 | Mrs Annette  | Lang | MM9/MM14 |  | See response above. |
| 899111 | SC68 | Jane  | Lang | MM9/MM14 |  | See response above. |
| 899114 | SC69 | Joanne  | Ledger | MM9/MM14 |  | See response above. |
| 899116 | SC70 | Sally | Lemar | MM9/MM14 |  | See response above. |
| 899117 | SC71 | David | Lemar | MM9/MM14 |  | See response above. |
| 899118 | SC72 | Gilllian  | Lemar Collings | MM9/MM14 |  | See response above. |
| 899120 | SC73 | Miss Karina (letter)  | Lidbury | MM9/MM14 |  | See response above. |
| 898715 | SC74 | Mrs M (letter) | Lidbury | MM9/MM14 |  | See response above. |
| 899121 | SC75 | David & Barbara  | Lightbown | MM9/MM14 |  | See response above. |
| 899125 | SC76 | Nancy (letter) | Lucas | MM9/MM14 |  | See response above. |
| 899394 | SC77 | Emma  | M |  |  | See response above. |
| 899396 | SC78 | Daniel  | Mallandaine | MM9/MM14 |  | See response above. |
| 899136 | SC79 | Tina | Maunder | MM9/MM14 |  | See response above. |
| 899137 | SC80 | Patricia & Piers  | McBride | MM9/MM14 |  | See response above. |
| 899135 | SC81 | Gabriele Boari (?) & Andrea (Letter) | Miles | MM9/MM14 |  | See response above. |
| 899139 | SC82 | Caroline & Huw  | Milner | MM9/MM14 |  | See response above. |
| 899141 | SC83 | Venna & John  | Milsom | MM9/MM14 |  | See response above. |
| 899142 | SC84 | Mr T (letter) | Moore | MM9/MM14 |  | See response above. |
| 899399 | SC85 | Adam  | Morton | MM9/MM14 |  | See response above. |
| 899146 | SC86 | Paul & Angela  | Newman | MM9/MM14 |  | See response above. |
| 829508 | SC87 | David  | Newton | MM9/MM14 |  | See response above. |
| 899147 | SC88 | Lesley  | Newton | MM9/MM14 |  | See response above. |
| 899148 | SC89 | J W | Nicholls | MM9/MM14 |  | See response above. |
| 899150 | SC90 | Mrs Michelle  | Noble | MM9/MM14 |  | See response above. |
| 899151 | SC91 | Tony | Noble |  |  | See response above. |
| 899155 | SC92 | Mike & Val  | O’Connell | MM9/MM14 |  | See response above. |
| 899152 | SC93 | Derek F (letter) | Oatley | MM9/MM14 |  | See response above. |
| 899156 | SC94 | Dee  | Parnell | MM9/MM14 |  | See response above. |
| 899160 | SC95 | Jim | Pearson | MM9/MM14 |  | See response above. |
| 899157 | SC96 | Sandra | Pearson | MM9/MM14 |  | See response above. |
| 899161 | SC97 | R V  | Pells | MM9/MM14 |  | See response above. |
| 899164 | SC98 | Mrs M  | Piggott | MM9/MM14 |  | See response above. |
| 899167 | SC99 | Anita  | Piller | MM9/MM14 |  | See response above. |
| 899169 | SC100 | Brian (letter) | Piller | MM9/MM14 |  | See response above. |
| 899172 | SC101 | Nigel  | Piller | MM9/MM14 |  | See response above. |
| 899177 | SC102 | Elaine Ann  | Poole | MM9/MM14 |  | See response above. |
| 899174 | SC103 | Jennifer  | Powley | MM9/MM14 |  | See response above. |
| 899401 | SC104 | Mrs Jo  | Preston | MM9/MM14 |  | See response above. |
| 899181 | SC105 | Anna  | Pryor | MM9/MM14 |  | See response above. |
| 899187 | SC106 | S & R (letter) | Rankin  | MM9/MM14 |  | See response above. |
| 899190 | SC107 | Michael  | Read & Mrs H Burdon | MM9/MM14 |  | See response above. |
| 899196 | SC108 | Mr & Mrs E  | Rixon | MM9/MM14 |  | See response above. |
| 899200 | SC109 | William & Janine  | Roberts | MM9/MM14 |  | See response above. |
| 899205 | SC110 | J B  | Rogers | MM9/MM14 |  | See response above. |
| 899212 | SC111 | Mrs Elizabeth (letter) | Roper |  |  | See response above. |
| 899218 | SC112 | Mrs Wendy  | Salter | MM9/MM14 |  | See response above. |
| 899220 | SC113 | Amie  | Schofield | MM9/MM14 |  | See response above. |
| 899231 | SC114 | P E & K J (letter) | Sercombe | MM9/MM14 |  | See response above. |
| 899234 | SC115 | Marie  | Shepherd | MM9/MM14 |  | See response above. |
| 899237 | SC116 | Greta  | Sheppard | MM9/MM14 |  | See response above. |
| 899240 | SC117 | Mike  | Smart | MM9/MM14 |  | See response above. |
| 899242 | SC118 | George & Jeanne  | Stetson | MM9/MM14 |  | See response above. |
| 899248 | SC119 | Gary  | Stevens | MM9/MM14 |  | See response above. |
| 899252 | SC120 | Carol | Stockton | MM9/MM14 |  | See response above. |
| 899259 | SC121 | Mark  | Stockton | MM9/MM14 |  | See response above. |
| 899269 | SC122 | Tina  | Stockton | MM9/MM14 |  | See response above. |
| 899263 | SC123 | Judith  | Sumner | MM9/MM14 |  | See response above. |
| 899271 | SC124 | Stuart & Carol (letter)  | Tallamy | MM9/MM14 |  | See response above. |
| 899273 | SC125 | Raymond J  | Taylor | MM9/MM14 |  | See response above. |
| 899274 | SC126 | Margaret  | Templeman | MM9/MM14 |  | See response above. |
| 899405 | SC127 | Adam  | Towning | MM9/MM14 |  | See response above. |
| 899275 | SC128 | Derek  | Urban | MM9/MM14 |  | See response above. |
| 899276 | SC129 | Jenny & Arthur | Vowden | MM9/MM14 |  | See response above. |
| 899317 | SC130 | B (?) | Ward or Weed (?) | MM9/MM14 |  | See response above. |
| 899407 | SC131 | Mrs M  | Warrilow | MM9/MM14 |  | See response above. |
| 899408 | SC132 | Neil  | Warrilow | MM9/MM14 |  | See response above. |
| 899328 | SC133 | Nicolette  | Wells | MM9/MM14 |  | See response above. |
| 899320 | SC134 | Mrs H  | West | MM9/MM14 |  | See response above. |
| 899323 | SC135 | Julie | Weymouth | MM9/MM14 |  | See response above. |
| 899332 | SC136 | Mrs Sally  | White | MM9/MM14 |  | See response above. |
| 899335 | SC137 | Mr P C (Letter) | Whittam | MM9/MM14 |  | See response above. |
| 899165 | SC138 | Mr & Mrs  | Willcox & Mr & Mrs Pike | MM9/MM14 |  | See response above. |
| 899336 | SC139 | D  | Windsor | MM9/MM14 |  | See response above. |
| 899337 | SC140 | Mr Terry  | Womsley | MM9/MM14 |  | See response above. |
| 899338 | SC141 | Mr Christopher  | Woodman | MM9/MM14 |  | See response above. |
| 899339 | SC142 | Robert  | Woolcott | MM9/MM14 |  | See response above. |
| 899340 | SC143 | Dave  | Woolway | MM9/MM14 |  | See response above. |
| 899343 | SC144 | Christopher  | Yeoman | MM9/MM14 |  | See response above. |
| 899345 | SC145 | Susan  | Yeoman | MM9/MM14 |  | See response above. |
| **Private Individuals – Paignton- other than White Rock** |
| 417506 | PI1 | Adrian  | Gee | MM10MM11 | Object to development at Collaton St Mary. Reduction in numbers does not eliminate landscape, etc impact and loss of village character.  | See above. This does not directly relate to Modifications to the Plan. The Modifications have reduced the number of dwellings proposed in Collaton St Mary by around 376 dwellings in accordance with the findings of the Masterplan.  |
| **Private Individuals- White Rock** |
|  |  |  |  |  | Objections to White Rock Future Growth Area – landscape, ecology, tourism, transport, infrastructure, local facilities. Loss of farmland. Loss of urban wedge protecting Galmpton. The Secretary of State has previously rejected employment development on the site. Allocating the site is contrary to localism.  | See detailed response above in relation to Abacus and Natural England.  |
| 899168 | WR1 | Angela  | Ainscough | MM3 | Object | See above. |
| 899170 | WR2 | Wendy (letter) | Arrowsmith | MM3 | Object | See above. |
| 899171 | WR3 | Jennifer  | Ashington | MM3 | Object | See above. |
| 899173 | WR4 | Deborah  | Avery | MM3 | Object | See above. |
| 899175 | WR5 | Mr D J (letter)  | Barr | MM3 | Object | See above. |
| 899178 | WR6 | Jackie  | Baxter | MM3 | Object | See above. |
| 899180 | WR7 | Rick(letter) | Behenna  |  |  | See above. |
| 899189 | WR8 | Mrs R G  | Bell | MM3 | Object | See above. |
| 899191 | WR9 | C W (?) (letter) | Berryman | MM3 | Object | See above. |
| 899197 | WR10 | Frank  | Bowden | MM2 | Object  | See above. |
| 429431 | WR11 | Dr Helen  | Boyles | MM3 & MM1  | Object | See above. |
| 357855 | WR12 | Richard  | Boyles | MM3 | Object | See above. |
| 899202 | WR13 | Niall & Ina  | Brooks | MM3 | Object | See above. |
| 899204 | WR14 | Dr R & Mrs P  | Brown | MM3 | Object | See above. |
| 899206 | WR15 | Mrs Janet  | Bull | MM3 | Object | See above. |
| 899208 | WR16 | H Burke (Holly Simpson) | Burke | MM3 | Object | See above. |
| 899213 | WR17 | Robert & Yvonne  | Childs  | MM3 | Object | See above. |
| 899214 | WR18 | Anna  | Chrystie | MM3 | Object | See above. |
| 899215 | WR19 | Emily  | Chrystie | MM3 | Object | See above. |
| 899216 | WR20 | Peter  | Chrystie | MM3 | Object | See above. |
| 829357 | WR21 | Mr & Mrs J (letter) | Collinge | MM3 | Object | See above. |
| 899217 | WR22 | G W (letter) | Colman | MM3 | Object | See above. |
| 899219 | WR23 | Sean  | Congdon | MM3 | Object | See above. |
| 899222 | WR24 | Robert J  | Davies | MM3 | Object | See above. |
| 899227 | WR25 | Mrs D R & Mr R F  | Duggan | MM3 | Object | See above. |
| 899228 | WR26 | David  | Edey | MM3 | Object | See above. |
| 899230 | WR27 | Adrian  | Evers | MM3 | Object | See above. |
| 899233 | WR28 | Jeremy  | Fatz | MM3 | Object | See above. |
| 899235 | WR29 | S (letter) | Fleming | MM3 | Object | See above. |
| 899236 | WR30 | Rebecca  | Ford-Bartlett | MM3 | Object | See above. |
| 899239 | WR31 | Dr G J  | Gardner | MM3 | Object | See above. |
| 899241 | WR32 | J  | Gardner | MM3 | Object | See above. |
| 899244 | WR33 | Helen & Alan  | Gilliland | MM3 | Object | See above. |
| 899247 | WR34 | Mrs M (letter) | Goldsmith | MM3 | Object | See above. |
| 899249 | WR35 | Dr Jenny  | Graham | MM3 | Object | See above. |
| 899253 | WR36 | Mr Edward (letter) | Hewitt | MM3 | Object | See above. |
| 899254 | WR37 | Jon  | Lavin | MM3 | Object  | See above. |
| 899256 | WR38 | Kay  | Lavin | MM3 | Object | See above. |
| 899257 | WR39 | Ronald Law & Associates (retired) (letter) | Law | MM3 | Object | See above. |
| 899258 | WR40 | Jenny  | Lee | MM3 | Object | See above. |
| 899260 | WR41 | Vanessa  | Lewis | MM3 | Object | See above. |
| 899262 | WR42 | Andrew | Loader |  |  | See above. |
| 829682 | WR43 | Lovejoy | Leaf | MM1/MM3  | Object. Also object to growth levels (MM1) and duty to cooperate issues.  | See above. |
| 899450 | WR44 | Mrs Mavis  | Makepeace | MM3 | Object | See above. |
| 899456 | WR45 | Mrs Margaret  | Manion | MM3 | Object | See above. |
| 899457 | WR46 | Karen  | Marshall | MM3 | Object | See above. |
| 500150 | WR47 | Mrs Joan | Mazumdar | MM3/ MM1 | Object  | See above. |
| 899947 | WR48 | Clare & Patrick  | McMahon | MM3 | Object | See above. |
| 899948 | WR49 | C D (?) (letter) | Medley | MM3 | Object | See above. |
| 899949 | WR50 | Stuart  | Miller | MM3 | Object | See above. |
| 899951 | WR51 | Susan  | Miller | MM3 | Object | See above. |
| 899952 | WR52 | Mrs J (letter)  | Mills | MM3 | Object | See above. |
| 899955 | WR53 | Mr S  | Munns | MM3 | Object | See above. |
| 899956 | WR54 | Martin  | Murray | MM3 | Object | See above. |
| 899960 | WR55 | Mrs J (?) (letter)  | Nicholaus | MM3 | Object | See above. |
| 899962 | WR56 | Phyllis  | Norman | MM3 | Object | See above. |
| 899966 | WR57 | Sheila  | O’Connor | MM3 | Object | See above. |
| 899972 | WR58 | Alistair  | Pascoe | MM3 | Object | See above. |
| 899973 | WR59 | Joyce  | Peach | MM3 | Object | See above. |
| 899975 | WR60 | M G  | Peach | MM3 | Object | See above. |
| 899976 | WR61 | Mrs Rachel  | Peach- Murray | MM3 | Object | See above. |
| 899977 | WR62 | S (letter) | Peacock | MM3 | Object | See above. |
| 899978 | WR63 | Deborah | Perret | MM3 | Object | See above. |
| 899979 | WR64 | Mrs J A (letter) | Pidgeon | MM3 | Object | See above. |
| 899980 | WR65 | Mr Mark (letter) | Pidgeon | MM3 | Object | See above. |
| 899983 | WR66 | Mr K S  | Popham | MM3 | Object | See above. |
| 899985 | WR67 | Dr Martin  | Ridge | MM3 | Object | See above. |
| 899990 | WR68 | Nikki  | Rogers | MM3 | Object | See above. |
| 899997 | WR69 | Janet & Paul  | Savin | MM3 | Object | See above. |
| 899998 | WR70 | Diana & John (letter) | Scotney | MM3 | Object | See above. |
| 900000 | WR71 | Duncan  | Searle | MM3 | Object | See above. |
| 900007 | WR72 | Jeff  | Searle | MM3 | Object | See above. |
| 900008 | WR73 | Joanne  | Seymour | MM3 | Object | See above. |
| 900009 | WR74 | John & Sara  | Seymour | MM3 | Object | See above. |
| 429416 | WR75 | S W  | Sherren | MM3 SS2SDP3 | Object to land at White Rock. Urban sprawl, landscape, ecology, transport. Goes against localism. Precedent for resisting development has been set by Churston Golf Course appeal. | See above. |
| 900012 | WR76 | Emma  | Shivaanand | MM3 | Object | See above. |
| 900013 | WR77 | Clair | Stanley | MM3 | Object | See above. |
| 900017 | WR78 | Susan  | Swan | MM3 | Object | See above. |
| 900020 | WR79 | John & Glenda  | Tapp | MM3 | Object  | See above. |
| 900023 | WR80 | T V (letter) | Tattersall | MM3 | Object | See above. |
| 900025 | WR81 | Judith  | Thomas | MM3 | Object | See above. |
| 900026 | WR82 | Mrs Jacquelyn  | Waldron | MM3 | Object | See above. |
| 900028 | WR83 | Rupert  | Walker | MM3 | Object | See above. |
| 900030 | WR84 | S (letter) | Ware  | MM3 | Object | See above. |
| 358268 | WR85 | Michael  | Webster | MM3 | Object | See above. |
| 900036 | WR86 | Scott  | Williams | MM3 | Object | See above. |
| 900038 | WR87 | Linda  | Wilson | MM3 | Object | See above. |
| 900041 | WR88 | E A (letter) | Witterley | MM9/MM14 |  | See above. |
| 900047 | WR89 | K L (letter) | Wright | MM3 | Object | See above. |
| 900049 | WR90 | Ian | Young |  |  | See above. |
| 900050 | WR91 | Illegible, 17 Manor Vale Rd, Galmpton (letter) | X Unknown | MM3 | Object | See above. |
| **Private Individuals - Brixham** |
| 829357 | BI1 | Mr & Mrs J  | Collinge | MM14 | Object to development on car parks unless alternative provision is made to retain car parking e.g. underground or making better use of space.  | The development of car park sites in Appendix D of the Local Plan states that they are subject to retention of sufficient car parking. Underground parking is one solution, although may be expensive and run into flooding problems. In Brixham this only relates to Shoalstone Overflow car park (although Oxen Cove and Freshwater car parks, and the Town centre are identified in SDB2 Table 5.15 and are not the subject of proposed Modifications). |
| 892197 | BI2 | Cherry  | Hosking | MM14 Sup | Support the inclusion of land at St Marys campsite. Would meet housing needs and would complement the adjacent brownfield site.  | Support for St Marys Campsite (and lack of objection from residents) is noted. However, the site is subject to significant concerns from Natural England and other bodies in relation to greater horseshoe bat issues. In the absence of evidence that these could be mitigated, it is recommended that the Campsite should be removed from the pool of sites in Appendix D of the Local Plan.  |
| 900064 | BI3 | William & Jenefer | Hosking |  | Support the inclusion of land at St Marys campsite. Would meet housing needs and would complement the adjacent brownfield site. | See above.  |
| 900066 | BI4 | Edwina | Scarlett | MM14 Sup | Support the inclusion of land at St Marys campsite. Would meet housing needs and would complement the adjacent brownfield site. | See above |
| 900067 | BI5 | Lilla  | To | MM14 Sup | Support the inclusion of land at St Marys campsite. Would meet housing needs and would complement the adjacent brownfield site. | See above |
| 900093 | BI6 | Ian  | Watson | MM1MM14 Sup  | Support inclusion of St Marys Campsite, as it is adjacent to brownfield land, not in agricultural use and is not intrusive in the landscape.  | See above |
| 366378 | BI7 | Mr Brian | Harland | MM1 | Growth rate in MM1 is too high and will harm Torbay’s environment and viability as a tourism setting.  | See above |