

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 ON THE PROPOSED REPLACEMENT MAIN MODIFICATIONS TO THE SUBMISSION LOCAL PLAN

REPRESENTATIONS BY CONSULTEE/ORGANISATION

Torbay Council – 14 August 2015

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

Summary of this document

This document summarises representations to the Proposed Replacement Main Modifications to the Torbay Local Plan 2012-32 and beyond “A landscape for success”. It summarises these in order of consultee/organisation, and provides a brief response to the points made. A separate schedule of responses by Replacement Main Modification/Policy Number has also been produced.

The Replacement Main Modifications were the subject of public consultation between Monday 22nd June and Monday 3rd August 2015.

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

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, with Further Findings received 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 related to matters that went to the heart of the Local Plan’s soundness, particularly relating to increasing the overall housing numbers to 10,000 dwellings between 2012-32 and the identification of additional potential housing sites. The Modifications also sought to clarify the mechanism to bring forward site allocations plans if Neighbourhood Plans did not identify sufficient land.

Representations to the Main Modifications raised a number of significant issues, particularly around Habitats Regulations constraints (see TC/MOD/10- TC/MOD17). The Council has produced schedules of issues raised by the Modifications and its response to them: www.torbay.gov.uk/tcmod12.doc. Following consideration of these, and correspondence with the Inspector (PH/16-P/H18 <http://www.torbay.gov.uk/ph16.pdf> <http://www.torbay.gov.uk/ph17.pdf> <http://www.torbay.gov.uk/ph18.pdf>), the Council resolved to publish Replacement Modifications.

Replacement Modifications

As the name implies, the Replacement Modifications replace the Modifications published in February 2015. Accordingly the original Modifications are withdrawn. However, a number of representations on the Modifications, and issues noted in the SA and HRA (TCRMOD/7 www.torbay.gov.uk/tcrmod7.pdf and TCRMOD/8 www.torbay.gov.uk/tcrmod8.pdf), have influenced the content of the Replacement Modifications.

The Replacement Main Modifications (RMMs) deal with matters that are central to the Local Plan's soundness. In summary they propose 8,900 dwellings and 5,000-5,500 new jobs over a reduced Plan period of 2012-30 (a reduction of 1 year). They undertake that the Council will produce site allocations documents if Neighbourhood Plans are not submitted by 31 March 2016, and also set out details on monitoring of jobs and homes.

A companion schedule of Replacement Additional Modifications (RAMs) has been prepared for consultation at the same time as the Replacement Main Modifications. These deal with matters that do not go to the heart of the Local Plan's soundness. In particular they strengthen the environmental safeguards set out in the Proposed Submission Plan and update the Plan to reflect new government guidance on matters such as affordable housing thresholds, space standards and allowable solutions for carbon reduction.

Both the Proposed Replacement Main Modifications and Proposed Replacement Additional Modifications documents were the subject of public consultation between Monday 22nd June and Monday 3rd August 2015.

Broad Conclusions on the 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, consistent with government advice. 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,

Following extensive consultation and discussion with bodies such as Natural England, there is good evidence that Torbay can accommodate around 8,900 new homes and 5,000-5,500 new jobs during the Plan period.

This is an ambitious but realistic target for Torbay. It provides sufficient land to support and facilitate a significant improvement in Torbay's economic fortunes, without breaching environmental limits.

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 Replacement Main Modifications confirm that provision of significant additional housing land, above that identified in the Replacement Modifications, might - on the basis of evidence available at this time - breach the Bay's environmental capacity for growth.

The Local Plan will be monitored annually and be the subject of a more major five year review. The Replacement Modifications set out criteria that will be considered at review stage, and it is possible that further sites could be included at this stage, when their environmental impact has been fully assessed. However the Plan identifies ample land to meet objectively assessed need over at least the first 15 years of the Plan Period (i.e. to the mid 2020s) and probably longer.

Issues raised by representations of the Replacement Main Modifications and Council's Conclusions on them:

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

Full Objectively Assessed Need (FOAN) and how much reliance can be put on the 2012 Household Projections as a measure of Objectively Assessed Need. The objections made about the overall growth levels and strategy are similar to matters raised in previously stages and discussed at the Examination Hearing. These have been discussed in the Council's Growth Strategy and Capacity for Change Topic Paper (SD24), the July 2015 update (PH/19) 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, but not significantly so. The largest driver of population and household growth in Torbay remains inward migration. 85% of the DCLG household projections are driven by population level and 10% by household formation rates. As set out in PH/19 the 2012 Population and Household Projections are based on above trend based migration assumptions.

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.

The Council considers that its evidence on housing need set out in the PBA report and subsequent technical papers (see above) remain robust. However, this is tempered by the fact that need above around 8,000 new dwellings (to 2030) will be driven by new jobs and therefore dependent upon economic recovery taking place from 2016. The Local Plan addresses this uncertainty by undertaking to monitor job creation and review the Local Plan on a 5 yearly basis, or sooner should economic indicators show this to be necessary.

Relationship between jobs and homes. Objectors have noted that the Local Plan's housing figure is above the demographically implied requirement, and that additional housing is predicated upon job creation above trend levels. It is noted that the number of jobs fell between 2012 and 2013. (2013 being the most recent NOMIS figure, although a 2014 figure is expected to be published later in 2015). It is also argued that there was an oversupply of housing between 2001-11 which led to an expansion in second home ownership. The Council's position on this is set out in PH/19. As set out above, the Local Plan seeks to exceed the "trend based" rate of job growth, which may lead to demand for additional homes in the latter part of the Plan period.

The Council agrees that this is a matter for monitoring at the first five year review (or earlier if jobs expand e.g. due to the effects of the South Devon Link Road (to be called the South Devon Highway)).

Reliance on windfalls (post year 5) and car parks rather than identifying larger sites. The SHLAA (2013 update, Part 8) indicates a stock of smaller sites and historic high delivery of dwellings on smaller sites at about 130 dwellings per year. Torbay's 2015 Annual Housing Monitor indicates a stock of 316 dwellings with permission on sites of 5 or fewer dwellings. The Monitor indicates 2047 deliverable dwellings (with planning permission) on sites of 6+ dwellings, at April 2015. Appendix D of the Local Plan lists a wide range of sites (in the 6+ dwelling category) that are considered to be developable (some of which also have planning permission).

On this basis there is good justification for expecting windfall sites to continue to form a significant element of housing land supply throughout the Plan period.

It is possible that individual sites (as set out in Appendix D) may not be developed, and RMM14 (relating to Appendix D sites) confirms that the development of car parks is dependent upon sufficient parking being retained. However these remain only a small proportion of the list of Appendix D sites. Moreover the Torquay and Paignton town centre car parks mentioned in RMM14 are part of the Masterplans for the town centres, which were adopted as Supplementary Planning Documents by the Council in June 2015. This increases certainty that they will be redeveloped as part of town centre regeneration initiatives, not least because resources and mechanisms have been put in place by the Council and Torbay Development Agency to secure delivery of the masterplans.

Urban brownfield sites have very significant benefits in terms of town centre regeneration and minimising the loss of countryside. It would not be a sustainable strategy to rely overly on greenfield sites as a source of housing supply.

Change to Plan period and retention of 15 years Plan period from adoption. Some objections to the reduction in the Plan period argue that the change to the Plan period would leave the Plan with less than 15 years from adoption. NPPF paragraph 47 requires Local Plans to provide five years of deliverable sites and to “identify a supply of specific, deliverable sites or broad locations for growth, for years 6-10 and where possible for years 11-15”. On this basis (assuming adoption by 31/3/16) the Local Plan needs to provide specific deliverable sites to 2020/21 and broad locations to 2025/6. Paragraph 157 of the NPPF requires a “preferable” 15 year time horizon, but does not explicitly require a 15 year housing land supply. Conversely the requirements of paragraph 47 are explicit.

Notwithstanding this, the Local Plan Proposed Replacement Modifications intend a Plan period of 1 April 2012 (i.e. financial year 2012/13) to 31 March 2031 (financial year 2030/31). This makes a 19 year Plan period, with 15 clear years so long as the Plan is adopted by 31 March 2016. Whilst the Council would not object to the period being compressed to 31 March 2030 (2029/30) i.e. an 18 year Plan period, this would result in less than 15 years from adoption in 2016.

Trigger point for preparation of Site Allocation Plans. Paignton Neighbourhood Forum objects to the undertaking that the Council will produce site allocation plans should Neighbourhood Plans fail to identify sufficient land, on the basis that this will remove autonomy from the Forums. It will be noted that the three Forums have been extensively involved in the preparation of the development plan for Torbay over a long period of time and have been key parties in the debate around growth levels etc. All Neighbourhood Forums have supported adoption of a new Local Plan as soon as possible. Whilst there have been some changes to the emerging Local Plan, the Local Plan’s central strategy has not changed significantly and thus there has and continues to be sufficient time to submit Neighbourhood Plans to the Council. The Replacement Main Modifications have allowed until 31 March 2016 for Neighbourhood Plans to be submitted. The Council acknowledge concerns from some house builders that this is a tight deadline for preparation of site allocation documents in time to avoid a policy vacuum after 2017. However, Torquay and Brixham Neighbourhood Forums have undertaken to submit Neighbourhood Plans, which are in general conformity with the Local Plan, by March 2016. All three Forums are proposing to consult on Neighbourhood Plans in Autumn 2015. A similar undertaking is being sought from Paignton. In addition, the sites likely to be included in any formal site allocations documents are already well known and have been consulted upon as part of the new Local Plan preparation. They are identified in Appendix D of the Local Plan.

Environmental capacity / additional sites. Torbay’s environmental capacity is discussed above. The Council has sought to address key concerns about the impact of development upon key environmental issues, particularly the South Hams AONB, SAC and candidate Marine SAC. A number of Replacement Additional Modifications have strengthened the environmental protection policies in the Proposed Submission Plan. It is noted that Natural England now fully support the Local Plan as amended by the Replacement Main and Additional Modifications.

Removal of land south of White Rock. The Council has carefully considered the allocation of land South of White Rock and has examined the advice and evidence available to support such an allocation. Whilst some evidence is available to indicate the site may come forward, for example in the first review of the Local Plan, it is not sufficient evidence to support allocation of the site at this moment in time. The removal of land south of White Rock (former Main Modification 3 (SS2) has been supported by a number of stakeholders, including South Hams District Council, Natural England and the Torbay Coast and Countryside Trust. It is noted that the site has been actively promoted by Abacus/Deeley Freed who have provided details of landscape and ecological impact. Abacus/Deeley Freed have accordingly objected to the site's exclusion. Whilst the Council acknowledge that the site offers an opportunity for a strategic development, there are outstanding issues relating to impact on both greater horseshoe bats and the AONB that have not been resolved, and will take at least 12 months to resolve. There is no guarantee that delaying the Plan for a year would resolve these issues.

The Local Plan exceeds the 2012 household projections level of housing growth, and provides for a longer housing trajectory than is required by NPPF para 47. In the Council's view the site should be reassessed at the first review of the Local Plan, should the evidence point to it being required (i.e. if employment levels pick up).

St Marys Park. The Council notes that the land owner has commissioned ecological surveys and maintains that the site can be shown to be developable. This evidence will not be available until September 2015, at the earliest, and until this is available the most detailed evidence available is the Further HRA site assessment by Kestrel Wildlife Ltd (PH/10) which flags up likely significant effects on the South Hams SAC. In any event the site is not strategically significant and its possible delivery could be resolved either through the Neighbourhood Plan or as part of a Local Plan review.

Infrastructure Delivery. The Council considers that its Infrastructure Delivery Plan is adequate. There is a need to prioritise the infrastructure identified in the 2012 Infrastructure Delivery Study (SD/85); however the Plan makes provision for critical infrastructure to be addressed. In the Council's view, drainage/ sewerage infrastructure is critical infrastructure, as well as the need for 'dark' corridors to provide for greater horseshoe bats.

The Assessment of Sewer Capacity (AECOM 2014; SD88) and responses from the Environment Agency confirm that the main impact on sewer capacity is from urban creep, climate change and the legacy of combined sewers, and not new development per se. Policies SS7, ER1, ER2 and W5, as Modified, go to significant lengths to reduce storm water draining into combined sewers.

With regard to greater horseshoe bats, Policies SS8 and NC1 now set out a clear requirement for the provision and maintenance of 'dark' corridors, management of recreation pressures, and other mitigation measures to avoid significant effects to the SAC.

The Council acknowledges that the Western Corridor poses a key infrastructure pinch point. However, SATURN modelling (2010, SD70) indicates that Torbay is able to accommodate a growth rate of 10,000 dwellings (i.e. 1,100 dwellings above the Replacement Modification figure) without severe residual impacts on the road network. Policies SS6, TA1 and TA2 set out a framework for continuing improvements to

the Western Corridor and A385 Totnes Road. They also seek a modal shift away from private motor vehicles and propose key sustainable transport infrastructure such as ferry services, public transport hubs and a new train station serving the Torquay Gateway Future Growth Area. These are subject to significant funding bids through the Local Transport Plan Implementation Plan (SD/68) and Local Sustainable Transport Fund. The Council has an excellent track record of securing funding, from new development and from Growth Deal, to ensure infrastructure improvements are undertaken to facilitate growth.

Other infrastructure, such as health care, education, leisure facilities etc is covered in the Plan. It is accepted that a prioritisation will need to take place for such matters, not least given limited development viability and scope for CIL/Planning Obligations. However, the Council does not consider that Torbay is unusual in having to prioritise funding decisions; nor are these in-principle barriers to growth.

The Council does not consider that the representations to the Replacement Modifications result in the need for major changes to the Main Modifications. However, the Council considers that a small number of minor changes, largely as an editorial matters, should be introduced in response to the Replacement Main Modifications. These are highlighted **yellow** in the table below and summarised in a separate Schedule of Recommended Further Modifications.

What happens next?

The representations on the Proposed Replacement 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					
ID	File No.	Person /Organisation Consultee	Replacement Modification/ Policy No.	Summary of Representations Made	LPA Response
Partner organisations					
438366	P1	South Devon AONB Partnership	RMM3/SS2 Support RMM14 Support	Support deletion of land south of White Rock and St Marys Campsite due to potential harmful impacts on the AONB and setting.	Support welcomed.
843212	P2	Torbay Coast and Countryside Trust	RMM1 Support RMM3 Support RMM14 Support	Support the removal of land south of White Rock and St Marys Campsite due to biodiversity sensitivities.	Support welcomed.
National organisations					
425628	NO1	Devon and Cornwall Police Architectural Liaison Officer	-	No comment	Noted
494352	NO2	Marine Management Organisation	-	No comments on the Main Modifications. Minor observations on RAMs	Noted. The Role of the MMO and Marine Licences etc is already mentioned in the Local Plan (supporting text to Policy TO3).
400188	NO3	Natural England	SS1, SS8 etc. Support	Support the Replacement Main Modifications to the Plan and agree with the Authority that the spatial distribution is within environmental limits. The SA and HRA are legally compliant.	Support welcomed.
417366	NO4	South West Water	RMM1/SS1 etc Support	No objections. Support sustainable drainage measures to remove surface water from shared sewers. If Policies ER1, ER2 and W5 are implemented in full, SWW do not envisage any significant reason why the Plan cannot be delivered.	Support welcomed. The need for site specific assessment and the implementation of SuDS are noted.
501495	NO5	Sport England	RMM14 Support	Support deletion of Steps Cross Playing Field. Welcome the mention of active design (RAM139)	Support noted.
Neighbouring Local Authorities, Neighbourhood Forums, Community Partnerships, Parishes and Amenity Societies					
828890	AFC1	Brixham Neighbourhood Forum	RMM1/SS1 (et al) Object RMM3 Support RMM14 Support	Endorse Paignton Neighbourhood Forum's objections. Object to overall growth levels above 7,900 (i.e. 2012 based household project). Object that the Local Plan is based on over	See discussion in introductory sections above regarding overall growth levels and relationship between jobs and homes.

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ID	File No.	Person /Organisation Consultee	Replacement Modification/ Policy No.	Summary of Representations Made	LPA Response
			RMM12 Object/General comment	<p>ambitious assumptions about job growth leading to a high housing figure, (support aspiration for 5,500 jobs but consider that this may be too ambitious).</p> <p>The “lock gate” mechanism should be reinstated to limit new homes to new employment growth.</p> <p>Support deletion of land south of White Rock RMM3 and Churston Golf Club (RMM14)</p> <p>Brixham Neighbourhood Forum indicate a growth rate of 770 dwellings (i.e. 110 more than in SDB1/RMM12). These should be for local people/jobs and not for second homes. However the Forum acknowledge that these may be subject to HRA constraints and therefore the Local Plan figure of 660 dwellings is “prudent and precautionary” (para 23).</p> <p>Objections to Replacement Additional Modifications relating to designation of land at Churston Golf Course.</p>	<p>The Council notes that the Forum are seeking to identify 770 dwellings, which is in excess of the Local Plan target. However, BNF also correctly note the environmental constraints facing Brixham. No evidence has been submitted that indicates whether 770 dwellings can be achieved without harm to the HRA or AONB. Until this has been established the Council believes that 660 dwellings is more deliverable and agrees with the Forum’s assessment that this number is “prudent and precautionary”.</p> <p>Brixham Neighbourhood Plan would be able to bring forward higher level of growth than identified in the Local Plan, so long as this does not harm the SAC/AONB etc. Such an approach would also give the Forum greater control over this part of its housing supply to create local exceptions sites etc.</p>
844172	AFC2	Collaton Defence League /Collaton St Mary Residents Association: “The Combination”	RMM1 etc RMM3 RMM11 Object	<p>Object to overall growth levels- endorse Paignton Neighbourhood Forum’s Views.</p> <p>Object to development at Collaton St Mary: impact on village identity/character, landscape, flooding, agricultural etc problems. Object to the lack of an Infrastructure Delivery Plan.</p> <p>New homes will not meet local needs and will have a negative knock on effect on deprivation.</p> <p>Need for development at Collaton has not been justified- it’s part of an attempt to raise cash</p>	<p>Objection is noted. See response to Paignton Neighbourhood Forum on overall growth strategy.</p> <p>Collaton St Mary was identified in the 2008 and 2013 SHLAAs as being less constrained than other sites in Torbay. The details of development were consulted on in April 2014 as part of Masterplan preparation. The Local Plan has been modified to reflect the numbers considered achievable in the draft Masterplan.</p>

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				<p>though New Homes Bonus.</p> <p>The Local Plan should focus on brownfield sites and resist speculative development.</p> <p>Object to the Local Plan consultation procedure. Object to withdrawing first set of Modifications and seeking to proceed with the Local Plan against the Inspector's advice.</p>	<p>It is noted that there will need to be sustainable drainage and other measures to address flooding issues in Collaton St Mary. However South West Water have supported the overall Plan strategy. The Assessment of Sewer Capacity study (AECOM 2014) has also confirmed that the Local Plan is deliverable in strategic terms.</p> <p>While it is accepted that there are outstanding objections to the Local Plan, it has been prepared with thorough consultation on the Local Plan and Masterplan. The Council has sought to follow the Inspector's advice in his Initial and Further Findings (PH/3 and 4) as well in subsequent correspondence dated 21 May 2015 (PH/18).</p> <p>The Local Plan's housing numbers are predicated upon meeting the area's needs and not simply to raise money through New Homes Bonus.</p>
440741	AFC3	Collaton St Mary Residents Association (Mrs A Waite on behalf of)	RMM1, RMM11 Object	Object to level of growth and endorse Paignton Neighbourhood Forum's objections: lack of infrastructure, harm to wildlife, rural character etc.	See response to Paignton Neighbourhood Forum.
900169	AFC4	Maidencombe Residents Association	RMM9 Support RMM14 Support	Support removal of Sladnor Park. Request deletion of reference in Table 5.2 (RAM61)	Support noted. Schedule of RAMs recommends removing reference in Table 5.2 (RAM61).
704914	AFC5	Paignton Neighbourhood Forum	Object to RMM1 to RMM11	Overall Strategy Object to housing rates in excess of 7,900	Issues about growth levels and environmental capacity are noted but have

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			<p>RMM13 Support RMM14 Support</p> <p>Some Additional Modifications should be treated as Main Modifications: RAM74 (employment provision at Yalberton) and RAM177 Affordable Housing Thresholds.</p>	<p>dwelling to 2031. Revised housing trajectory submitted on basis of 7,900 dwellings:</p> <ul style="list-style-type: none"> • 355 dpa 2012/13- 2016/17 • 430dpa 2017/18- 2021/22 • 435 dpa 2022/3-30/31 <p>Clarify housing trajectory in the Plan and table 7.1 (8,900 over 19 years =468)</p> <p>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.</p> <p>Plan is not jobs led Target of 5,500 jobs is supported, but object that the Local Plan is not jobs led, 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.</p> <p>The PBA Housing Requirements Report has been superseded by later household and economic projections.</p> <p>The baseline for jobs should be specified and should refer to <u>net</u> additional FTE jobs.</p> <p>Infrastructure Housing growth of 8,900 cannot be accommodated within environmental/ infrastructure capacity (especially drainage</p>	<p>already been debated at the Examination Hearing and elsewhere.</p> <p>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). The Update to SD24 PH/19 sets out the Council’s view of objectively assessed need in the light of the 2012 based HH projections and current job-creation initiatives.</p> <p>Plan is not jobs led. PNF’s support for the headline target of 5,500 jobs is welcomed- although it is noted that there is a substantial objection to the Local Plan’s mechanism of securing employment. However, 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.</p> <p>While the Council is highly supportive of the need to improve economic prospects, it does not believe that there is a justification in the NPPF to implement rigid limit on new homes</p>

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				<p>capacity). Critical drainage problems at the West of Paignton. Foul water drainage is a severe constraint and the Sewer Capacity Modelling relies on water efficiency etc challenges. Need for an Infrastructure Delivery Plan.</p> <p>Environmental Capacity Housing growth of 8,900 cannot be accommodated within environmental capacity. Presumption in favour of sustainable development does not apply to HRA matters. Specifically object to landscape harm, loss of agricultural land at Collaton St Mary.</p> <p>Object to mechanism to produce site allocation documents if Neighbourhood Plans are not submitted by 31/3/2016: NPPF requires only 10 year housing provision.</p> <p>Concomitant objections to RAMs. In addition PNF argue that the following should be treated as Main Modifications: RAM74 (proportion of employment at Yalberton) RAM 129, RAM 130 (affordable housing thresholds) RAM177 (Monitoring of jobs) RAM178 (revised Table 7.1, relating to housing and phasing)</p>	<p>until new jobs are created. Nor would this approach be conducive to economic growth.</p> <p>Whilst there have been later economic projections than the PBA work, they are merely projections, whereas the PBA work contains analysis of trends and makes policy recommendations that remain robust (See PH/19).</p> <p>The Local Plan does allow for major 5 year review and also undertakes to review the Plan more often if material circumstance change significantly.</p> <p>It is agreed that the Local Plan should set a baseline for jobs and that the Plan should seek <u>net new jobs</u> (however the evidence base does not support 5,500 full time equivalents).</p> <p>Policies SS1 and SS5, para 1.1.9, 2.3.1, already refer to net additional jobs. Ensure that any other references are to net new jobs as an editorial matter.</p> <p>Recommended Further Additional Modification: Refer to a baseline of around 59,000 jobs at 2012, based on NOMIS Business Register at 7.5.14. This is a minor additional modification (see RAM177).</p> <p>The Council have no objection to specifying a single figure rather than a range for new jobs</p>

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					<p>in the first 5 years of the Plan.</p> <p>Recommended Further Additional Modification (RAM22A formerly RMM4) Specify 2030/31 with an emphasis on delivering 1250-1500 around 1,375 new jobs in the first 5 years of the Plan period.</p> <p>Yalberton Road (RAM74) This is discussed in detail in the Schedules relating to Replacement Additional Modifications.</p> <p>Infrastructure. See discussion in introductory section. SWW has confirmed that the Plan is deliverable so long as a programme of SuDS is implemented. Policies ER1, ER2 and W5 have previously been amended to incorporate comments by the Environment Agency, Natural England and others on the need for sustainable drainage.</p> <p>Environmental Capacity. The Council agrees that environmental capacity is a critical issue. The Submission Local Plan and Proposed Replacement (Additional) Modifications seek to address sewerage capacity through sustainable drainage measures. It is noted that South West Water and Natural England have supported the Local Plan in this respect.</p> <p>See more detailed response on separate issues raised in Schedule of Replacement Modifications by RMM/RAM</p>

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					<p>The Council considers that it is appropriate that Mitigation Plans should seek to safeguard the SAC from the potential harm from development in perpetuity.</p> <p>Recommended Further Additional Modification. Amend paragraph 4.1.20 (RAM17) to refer to in perpetuity.</p> <p>Affordable Housing thresholds.</p> <p>It is noted that objections from Paignton Neighbourhood Forum and SW Harp have argued that the change to the affordable housing threshold (RAM129, RAM130) should be considered as a Main Modification.</p> <p>Because the matter has been the subject of High Court challenge, the Council considers that it would be appropriate for the Inspector to comment on the proposed deletion of RAM129 and RAM130.</p> <p>Recommended Further Additional Modification Delete RAM129 and RAM130. i.e. revert to affordable housing threshold in the Proposed Submission Local Plan.</p> <p>The Local Plan's affordable housing threshold was modified in response to Ministerial Statement and changes to PPG 012-23 restricting the ability of Councils to</p>

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					<p>seek affordable housing on smaller sites. It is noted that this has been overturned by the High Court (West Berkshire DC and Reading BC and DCLG [2015] EWHC 2222 (Admin).</p> <p>The Council's affordable housing threshold set out in the Proposed Submission Plan (Policy H2) was not subject to objection. The Viability Testing of the Local Plan (PBA 2014) was based upon the affordable housing thresholds in the Proposed Submission Local Plan.</p> <p>It is noted that RAM129-130, amending the threshold (to exclude greenfield sites of 3-10 dwellings from affordable housing requirements) were made purely in response to the Ministerial Statement/PPG. These Replacement Modifications resulted in objections that it would result in the reduction of affordable housing (funding).</p> <p>Council considers that a lower affordable housing threshold as per the Proposed Submission Plan would better meet objectively assessed needs, and is consistent with the Local Plan's viability evidence.</p> <p>On this basis the Council proposes to revert to the Proposed Submission Plan Threshold (of 3 dwellings for greenfield sites and 15 for brownfield sites).</p> <p>(The Council notes that this will require further consultation on the Council's</p>

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ID	File No.	Person /Organisation Consultee	Replacement Modification/ Policy No.	Summary of Representations Made	LPA Response
					emerging Community Infrastructure Levy Draft Charging Schedule). Recommended Further Additional Modification: Delete RAM129 and RAM130
438382	AFC6	South Hams District Council	RMM2 Support RMM11 Object	RMM2 Support deletion of White Rock from SS2 RMM11 Object- express concern regarding overall low density of development at Collaton St Mary. Duty to Cooperate: Support joint monitoring and analysis of the need for and location of future development.	Support for Duty to Cooperate and removal of land south of White Rock welcomed. Collaton St Mary has been the subject of detailed Masterplanning in order to inform the Local Plan. The Masterplan has assessed the landscape impact of development. 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.
418700	AFC7	Stoke Gabriel Parish Council	RMM1/SS1 Object	Endorse Paignton Neighbourhood Forum's objections	See response to Paignton Neighbourhood Forum.
830233	AFC8	Stoke Gabriel Parish Plan Group	RMM1/SS1 Object	Endorse Paignton Neighbourhood Forum's objections	See response to Paignton Neighbourhood Forum.
923362	AFC9	Stoney Park Allotments Association	RMM14 Object	Boundary of Northcliff Hotel shows a former car park which is now part of the allotments.	Noted. The site boundary on the Polices Map can be amended as a minor editorial matter, and is dealt with in the schedules of representations on Replacement Additional Modifications.

Representations on Main Modifications * Objections unless otherwise stated					
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438373	AFC10	Teignbridge District Council	RMM1/SS1 No objection.	No concerns about the Proposed Replacement Modifications	Support noted.
817474	AFC11	Torquay Neighbourhood Forum	RMM1 Object and general comment	Object that job creation is not keeping pace with housing supply, which puts pressure on greenfield sites. Review should allow for housing numbers to fall if the number of jobs has not kept pace. General comment that there may be more brownfield opportunities, which may reduce the need for greenfield development e.g. at Broadley Drive	See response to Paignton Neighbourhood Forum regarding homes and jobs. The Local Plan indicates that a downward review in numbers could take place if supported by evidence. The issue of brownfield capacity is noted. The SHLAA has assessed likely brownfield opportunities. However it is accepted that other sites may arise, and these can be brought forward through the Neighbourhood Plan.
Business Sector/Organisations/Social Enterprise Sector					
Consultee 847469 Agent 844870	B1	South West Housing Association Registered Providers (HARP). (Tetlow King on behalf of)	RMM1 object RMM2 See also schedule of Replacement Additional Modifications	Object to Plan period change resulting in less than a 15 year time horizon. Object to evidence base: Strategic Housing Market Assessment is out of date Object to reliance on Neighbourhood Plans to allocate sites. Coupled with SW HARP's objection to the Local Plan evidence base, this could reduce certainty of delivery. Concern that changes to affordable housing thresholds, space standards, accessible and adaptable dwellings etc could affect the evidence of viability. See schedule of Replacement Additional Modifications (RAM 129,138,143).	Plan period. See discussion above. Ending the Plan period in 2030/31 (i.e. a 19 year Plan period will give a 15 year Plan period from April 2016). Evidence of housing need. See discussion above. The Housing Requirements Report and subsequent analysis of the Housing Register and demographic trends provides an update to the SHMA. Torbay's objectively assessed need has been discussed elsewhere at the Examination. Viability. The Council has recent viability evidence (PBA 2014). Whilst there have been a number of minor modifications to the Local Plan subsequent to this, these are largely updating the Plan to be consistent

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					<p>with the PPG, other Government standards etc. The standards are intended to be interpreted flexibly and the Local Plan sets out mechanisms for negotiating viability should this threaten development (See Para 4.3.34, Policy H2 explanation and para 7.4.12). See schedule of Replacement Additional Modifications.</p> <p>Affordable housing thresholds. (See also above in relation to Paignton Neighbourhood Forum's representation). The Local Plan affordable housing threshold was modified (RAM129-130) in response to Ministerial statement and changes to PPG 012-23 restricting the ability of Councils to seek affordable housing on smaller sites. It is noted that this has been overturned by the High Court (West Berkshire DC and Reading BC and DCLG [2015] EWHC 2222 (Admin).</p> <p>The Council notes SW HARP's comment that this affects the viability testing of the Local Plan.</p> <p>For the reasons set out above in relation to Paignton Neighbourhood Forum, the Council is proposing to delete RAM129-RAM130 but is inviting the Inspector to comment on this proposal.</p> <p>Recommend Further Additional Modification Delete RAM129 and RAM130. i.e. revert to affordable housing threshold in the Proposed</p>

Representations on Main Modifications * Objections unless otherwise stated					
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					Submission Local Plan
Development Industry - Housing					
Agent: 844863 Consultee: 844862	HB1	Abacus/Deeley Freed (Stride Treglown on behalf of)	RMM1 Object RMM3 Object	Object that removing land south of White Rock would leave the Local Plan unable to meet full objectively assessed need. Object to removal of land south of White Rock, as this could provide a deliverable strategic site. The concerns raised by Natural England can be overcome.	<p>As acknowledged by Stride Treglown, the issues relating to objectively assessed need have been addressed at detail in the examination.</p> <p>See more detailed discussion of land south of White Rock in the introductory section of this schedule. Whilst it is acknowledged that the site would be a deliverable and strategically significant site, there remain outstanding biodiversity and landscape matters that have not yet been satisfactorily resolved. These relate to effects on the AONB and HRA matters, both of which override the presumption in favour of sustainable development. It will be noted that the S of S refused development of the land for a business park in 1997.</p> <p>There is no guarantee that delaying the Plan for a year (which would be necessary to assess the site in full) would resolve the issues. Nor is the site likely to be needed to meet objectively assessed need in the short-medium term.</p> <p>On this basis, the Council considers that the land south of White Rock should remain excluded from the Local Plan and be considered further at the first five year review of the Plan. It is recommended that no</p>

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					further Modification to Policy SS2/ RMM3 is required.
Agent: 844198 Consultee: 791437	HB2	Bloor Homes (Boyer Planning on behalf of)	RMM1,Object RMM2,Object RMM3, supp/general observation. RMM4,Object RMM5,Object RMM6,Object RMM7,Object RMM8,Object RMM11,Object RMM14,Object	<p>Object to reduction in housing numbers below that indicated in the Inspector's Initial Findings: 8,900 will not meet full objectively assessed need. The Local Plan is unable to demonstrate 5 year supply. Reducing the Plan period and five year review mechanism should not be a substitute for allocating sufficient housing land. Object that the Plan is overly reliant upon five yearly reviews.</p> <p>Suggest a "slight" delay until matters relating to White Rock are resolved.</p> <p>Collaton St Mary (SDP3) could come forward early in the Plan period. But object to reliance on Neighbourhood Plans as a mechanism for delivering future growth areas.</p> <p>Object to reduction in numbers at Collaton St Mary: Bloor Homes suggest that the site they are promoting has capacity for 160 dwellings, and that this level of developments in necessary to make the site viable.</p> <p>Object to reliance on town centre car parks due to flooding, parking and deliverability issues.</p>	<p>See discussion above and in response to HBF about overall housing numbers.</p> <p>The draft Collaton St Mary Masterplan has been based on assessment of landscape etc capacity. Whilst it is possible that numbers could exceed the Masterplan level, this would need to be assessed in terms of landscape, drainage, biodiversity etc impact.</p> <p>The Council notes that both Bloor Homes and Taylor Wimpey are promoting land to the north of Totnes Road, Collaton St Mary for early delivery in the Plan period. It is also noted that these sites are the subject of significant community objection. However, so long as infrastructure (drainage and highways), landscape and ecology matters can be overcome, these sites could be deliverable earlier in the Plan period than envisaged in Policy SDP3 (table 5.12).</p>
844154	HB3	Home Builders Federation (HBF)	RMM1 Object RMM2 Object RMM6 Object RMM7 Object RMM10 Object	Object to reduction in house numbers and Plan period. Will result in FOAN not being met. 2012 Household projections do not give the full picture of need: based on recessionary migration and unattributable population change is not	<p>Overall strategy:</p> <p>The issue of objectively assessed needs is set out in the Council's update to the Technical Paper PH/19.</p>

Representations on Main Modifications * Objections unless otherwise stated					
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				<p>accounted for.</p> <p>The Local Plan does not identify sufficient land to maintain a five year supply. Supply is reliant upon car parks and vulnerable to mayoral Referendums.</p> <p>Object to reliance on Neighbourhood Plans to provide sites. 31 March 2016 will not allow site allocations plans to be adopted in time to maintain 5 year supply.</p> <p>Objection to over reliance on car parks and other sites with deliverability issues, rather than strategic (greenfield) allocations to meet housing requirements.</p> <p>Comments on RAM 129, 134,138, 143,144,155,179. See separate schedule.</p>	<p>The 2012 based Household Projections are not trend based on Sub National Population Projections (SNPP) for 2008-12, but are based on assumptions of higher than trend based (or long term trend) inwards migration. Population level (and therefore migration) makes up for 85% of housing growth and household formation 10%. Therefore the “unknown” factor is only 5% which is insignificant compared to migration rates.</p> <p>The Local Plan seeks to exceed the minimum level of housing growth in order to achieve economic recovery. However the need for additional housing above the 2012 based DCLG Household Projections level will only arise should net jobs increase at a rate above trend based economic forecasts.</p> <p>The Council monitors housing land on a yearly basis; at April 2015 there were 2,500 sites with planning permission, which is ample to meet five year supply.</p> <p>The SHLAA (2013 refresh) considers the deliverability of brownfield sites. Whilst it is acknowledged that some have constraints that do not apply to greenfield sites, they also have significant sustainability benefits. It would not be appropriate to exclude them in favour of easier to development, but less sustainable, greenfield sites</p> <p>The Council acknowledges that a cut off for</p>

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					Neighbourhood Plans of 31 March 2016 (RMM2) would make preparation of site allocation plans by April 2017 very challenging. However, Torquay and Brixham Forums have undertaken in their representations to prepare Neighbourhood Plans which are in general conformity with the Local Plan. In addition, both Bloor Homes and Taylor Wimpey have indicated in their representations that their sites (at Collaton St Mary) could come forward sooner than the Local Plan phasing envisaged. So long as infrastructure and phasing issues are resolved, these could help the five year supply position post 2017.
Agent: 923391 Consultee: 923389	HB4	Kingsland, Marldon Road, Torquay (Roger Arscott on behalf of)	RMM1 Obj RMM2 Obj RMM6 Obj RMM9 Obj RMM14 general observation SS5 (RAM23)-not duly made	<p>Object that housing numbers are too low, but the MMs still oversupply employment land.</p> <p>Housing numbers should be based on migration rates not job creation. Completion of the South Devon Link Road will increase Torquay's attractiveness and help address the critical shortage of housing in Exeter.</p> <p>Objection that there is an overprovision of employment at Edginswell and that Kingsland should be residential.</p>	<p>Objections are made in the context of promoting Kingsland, Marldon Road as housing, whereas the draft masterplan shows it as employment. It is therefore largely a matter for determination through the Masterplan.</p> <p>See discussion above regarding housing numbers, employment levels and environmental limits. However the point that much new employment will be spaceless is noted. This was taken into account by the Employment Land Review when identifying a need for employment land/floorspace.</p> <p>The Masterplans are intended to be flexible to allow a mix of uses. However it is noted that representations from the Neighbourhood Forums and public consider</p>

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					<p>that the Local Plan is not sufficiently jobs led.</p> <p>In any event, the Council considers that it is important that the Gateway is a mixed use development that capitalises on the area's accessibility to provide employment as well as housing. It is crucial that the Masterplanning has regard to the most appropriate disposition of uses within the Gateway Future Growth Area as a whole.</p> <p>Policy SS2 and SDT3 have not changed the quantum of development in the Torquay Gateway and therefore some of Mr Arscott's objections are not duly made.</p> <p>The Local Plan does not aspire for Torquay to become a dormitory settlement serving Exeter, since this would increase the need to travel.</p>
Agent 830010 Consultee 830289	HB5	Mrs Hosking (Savills/Smithsgore on behalf of)	RMM1 Object RMM14 Object	Land at St Marys Campsite is subject to ecological assessments that will be available in September. The site should remain identified in the Local Plan.	The Council's HRA assessment by Kestrel Wildlife Limited (PH/10) and representations by Natural England etc have pointed to likely harm to greater horseshoe bats from the development of St Marys Campsite. It is noted that ecological testing is being carried out. However it seems likely that only a relatively small amount of development (if any) will be achievable on the campsite given its landscape and ecological constraints. In any event Paragraph 116 of the NPPF sets a

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					high threshold for evidence before major development within the AONB can be permitted. On this basis any development of the site is unlikely to be strategic in nature and could be dealt with through the Neighbourhood Plan or as part of the Local Plan review.
Consultee: 923436 Agent: 923437	HB6	Mr and Mrs Hopkins (Maze Consulting on behalf of)	RMM11/SDP3 (Support)	Support identification of Woodland and surrounding land within SDP3 within the Future Growth Area	Support noted.
Agent 844351 Consultee 844178	HB7	Richmond Torquay (Jersey) Limited (PCL Planning on behalf of)	RMM1 Object RMM5 Object RMM9 Object RMM14 Object	<p>Object to reduction in Plan period: will result in less than 15 years from adoption (NPPF 157).</p> <p>Housing evidence is out of date- should consider 2012 based household projections. 2012 Based HH projections reflect the 2008-12 recession. Longer term migration flows should be considered.</p> <p>Sladnor Park: Too many sites have been removed- especially Sladnor Park, which has an extant planning permission (P/2008/1418) for a retirement village. The Council's ecological evidence (Greenbridge Ltd) suggests that Sladnor Park is deliverable.</p>	<p>Plan period. See discussion above. Ending the Plan period in 2030/31 (i.e. a 19 year Plan period will give a 15 year Plan period from April 2016.</p> <p>Evidence of Housing Need. See discussion above. The Council has considered the implications of the 2012 SNPP and HH projections. As assessed in PH/19 the 2012 SNPPs do assume above trend rate of inwards migration.</p> <p>Sladnor Park. There is some question over whether permission P/2008/1418 has been lawfully commenced (which would keep the permission alive). The Council has suggested that the site owners should establish this through a Certificate of Lawfulness.</p> <p>Natural England's letter of 18 March 2015 indicates that additional information would be required to locate GHB roosting and assess</p>

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					<p>its significance. The Greenbridge Report (TCMod/16) indicated that development of Sladnor Park has the potential to effect adversely the integrity of the SAC, and as a minimum a Screening is necessary to establish any likely significant Effect.</p> <p>On this basis the Proposed Replacement Modifications removed the site because of uncertainty about likely significant effects on bats. The site is not a strategically significant one and could come forward for development should biodiversity and landscape issues be overcome.</p> <p>However, commensurate with the site's rural setting and relative remoteness, it is probably more suitable to low density development such as a care home or tourism use (with enabling development) rather than medium-high density housing development.</p>
Agent: 844316 Consultee: 844315	HB8	Taylor Wimpey (Origin3 on behalf of)	RMM1 Object RMM2 Object RMM5 Object RMM6 Object RMM7 Object RMM10 Object RMM11 Object RMM14 Object	<p>Object that reducing housing numbers will not meet objectively assessed needs. The Local Plan is overly pessimistic about economic prospects.</p> <p>Object to the housing trajectory relying on windfalls beyond year 5, and reliance on car parks that have flooding etc issues.</p> <p>Object to undertaking to prepare site allocation Plans- the Local Plan should identify sufficient development land. This should include land south of White Rock and Collaton St Mary.</p> <p>Object to phasing on Collaton St Mary and</p>	<p>See discussion above regarding objectively assessed need.</p> <p>The NPPF does not rule out allowing for windfalls post year 5. Paragraph 48 merely says that windfalls can be counted in five year supply. The SHLAA, historic delivery rates and stock of small sites in the Housing Monitor point to the likelihood of windfalls continuing to arise throughout the Plan period.</p> <p>Collaton St Mary has been the subject of detailed Masterplanning. The Masterplan has assessed the landscape impact of</p>

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					reduction in numbers. Taylor Wimpey believe that it could come forward sooner and deliver more homes than suggested by the Masterplan.	<p>development. 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.</p> <p>The Council note that both Bloor Homes and Taylor Wimpey are promoting land to the north of Totnes Road, Collaton St Mary for early delivery in the Plan period. It is also noted that these sites are the subject of significant community objection. However, so long as infrastructure (drainage and highways), landscape and ecology matters can be overcome, these sites could be deliverable earlier in the Plan period than envisaged in Policy SDP3 (table 5.12).</p>
Private Individuals- address uncertain						
923420	PU1	Berry	Rob and Pat	RMM1	General objection to growth levels- environment, lack of jobs and infrastructure	Comment does not relate to Replacement Modifications.
Private Individuals –Torquay						
899040	TI1	Darling	Cllr Steve	RMM14 Support	Support the deletion of Steps Cross Playing Field. Will help local football teams, and provides local recreation.	Noted
Private Individuals – Paignton						
428525	P11	Bristow	Roger	RMM1 object RMM2-11 Object RMM 14 Object RAM74 Object	Object to housing levels. There has been a fall in jobs since 2012 and the economic situation in Torbay cannot support the level of housing growth in the Local Plan. The Plan is not jobs led.	<p>See response to Paignton Neighbourhood Forum, "The Combination" and others on Collaton St Mary.</p> <p>The Masterplan for this area has sought to</p>

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					Severe drainage/sewerage, traffic and pollution issues in the west of Paignton/Collaton St Mary. RAM74: Change to employment proportion at Yalberton should be a Main Modification.	address landscape and design issues. However the need for site level solution to drainage issues is noted. Policies ER1, ER2 and W5 would apply to developments within the area.
923422	PI2	Downing	Ben and Jane	RMM11/SDP3	General objection to Collaton St Mary	Objection does not relate to a Modification. Objections to Collaton St Mary are discussed elsewhere.
417506	PI3	Gee	Adrian	RMM3 Object RMM11/ SDP3 Object	Object to development at Collaton St Mary. The land west of Paignton is less accessible than in Torquay. Landscape, environmental and infrastructure constraints make Collaton St Mary unsuitable for development.	See response to Paignton Neighbourhood Forum et al on Collaton St Mary.
829682	PI4	Lovejoy	Leaf	RMM1/SS1 Obj	Endorse Paignton Neighbourhood Forum's objections. Demographic evidence does not support higher housing growth. Environmental and infrastructure constraints limit Torbay's capacity for growth, especially in the vicinity of Collaton St Mary.	See response to Paignton Neighbourhood Forum et al on Collaton St Mary.
923426	PI5	Miller	Susan	RMM1	Development should be proportional to an area's local needs. Objection to housing numbers.	Comment does not relate to Replacement Modifications. See response to Paignton Neighbourhood Forum on overall numbers.
558519	PI6	Parkes	Mike	RMM1/SS1 Object RMM3/SS2 Object RMM11/SDP3 Object	Object to development to the West of Paignton (SDP3): highways, biodiversity, air quality. Object to housing development as a way of earning new homes bonus etc.	See response to Paignton Neighbourhood Forum et al on Collaton St Mary.
Private Individuals – Brixham Peninsula (Galmpton)						
429431	BI1	Boyles	Dr Helen	RMM2 (support) RMM1 (SS1)	Support removal of south of White Rock (RMM2) Object to overall levels of growth: Homes not	Objections largely in context of overall growth levels noted above.

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				RMM5,RMM6, RMM7, RMM8, RMM10 RMM11 Object	matched by new jobs. New houses will be second homes. Drainage and environmental objections to development. Specific objections to Yalberton Road, Brixham and Collaton St Mary.	
899233	BI2	Fatz	Jeremy and Tracey	RMM1 (SS1) RMM5,RMM6, RMM7, RMM8, RMM10 RMM11 Object	Object to overall levels of growth. Homes will not not matched by new jobs. New houses will be second homes. Drainage and environmental objections to development. Specific objections to Yalberton Road, Brixham and Collaton St Mary	See above
899985	BI3	Ridge	Dr Martin	RMM1 Object RMM3 Support	Support removal of land south of White Rock (RMM2) Object to overall levels of growth: lack of jobs and environmental constraints.	See above
923435	BI4	Seear	Frank	RMM1 (SS1) RMM5,RMM6, RMM7, RMM8, RMM10 RMM11 Object	Object to overall levels of growth (as per Helen Boyles above and Steve Sherren below).	See above
429416	BI5	Sherren	Steve	RMM1 (SS1) RMM5,RMM6, RMM7, RMM8, RMM10 RMM11 Object	Overall objections to growth levels. Homes will not be matched by new jobs. New houses will be second homes. Drainage and environmental objections to development. Specific objections to Yalberton Road, Brixham and Collaton St Mary. Objections to RAM4, RAM5, RAM 10, RAM74 in the context of this overarching objection.	Objections largely in context of overall growth levels noted above.
900020	BI6	Swan	Susan	RMM1 (SS1) RMM5,RMM6, RMM7, RMM8, RMM10 RMM11	Object to overall levels of growth (as per Steve Sherren above)	See above

Representations on Main Modifications * Objections unless otherwise stated						
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				Object		
900047	BI7	Wright	Kevin	RMM1 (SS1) RMM5,RMM6, RMM7, RMM8, RMM10 RMM11 Object	Object to overall levels of growth (as per Steve Sherren above)	See above