

The National Trust acknowledge the factors constraining the delivery of a higher number of houses within the Torbay Plan area. The National Trust also recognise that such environmental or infrastructure constraints can be used to justify a lower figure. However we remain concerned that Torbay Council will be more vulnerable to speculative development applications from developers (and at Appeal) on unallocated sites (with particular concern relating to greenfield sites), where housing policies are considered 'out of date' and the 'titled balance' under paragraph 11 of the National Planning Policy Framework (NPPF 2024) is engaged.

It is noted that Torbay is reliant (at least in part) on agreement with neighbouring Authorities to address the unmet housing need of the Torbay Plan Area. Paragraph 1.65 of the Draft Local Plan states:

"the council considers that unmet housing need, (as calculated by the Standard Method and demographic projections) is a sub-regional matter that needs to be resolved in cooperation with wider Devon Authorities."

In our previous consultation response, the National Trust requested that further detail on how the unmet housing need is being addressed with neighbouring Local Planning Authorities should be provided in further consultation stages. Having reviewed the information available as part of this current consultation, there is no clarification yet available. In the absence of information setting out how the unmet need will be addressed by neighbouring Local Planning Authorities, the National Trust has concerns regarding the 'soundness' of the Plan in its current form.

The National Trust therefore requests that this is included for comment in further consultation stages.

I hope the above comments are useful in shaping the Torbay Local Plan. The National Trust wishes to be further consulted on the next stage of the Local Plan update 'Reg 19' stage and subsequent stages.

Yours sincerely

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Donna Crabtree BA Hons, MSc, MRTPI
Planning Adviser (Devon and Cornwall)