

## Future Planning

---

**From:** Rob\_At\_EEESafe [REDACTED]  
**Sent:** 28 January 2026 11:46  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Urgent: Torbay Local Plan 2025-45 consultation with Submission Issues.  
**Attachments:** Torbay\_Local\_Plan\_Response\_EEESafe\_LocalitEEE.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

You don't often get email from [REDACTED] [Learn why this is important](#)

---

Councillors Nigel Penny and Christine Carter,

---

I am writing as both a Torbay resident and a local business owner (EEESafe and LocalitEEE) living and operating in your Ward. Post Code [REDACTED]

Please find attached my 9-page structured submission for the Draft Torbay Local Plan 2025-45 (Reg 18).

**The consultation closes at 23:59 on Monday 2 February 2026.** I am therefore asking for your help to ensure my representation is formally received, logged, and taken into account as I have had issues submitting online:

I have reviewed the Council's online consultation portal (torbay.oc2.uk). It is constrained to short, fragmented, with only certain section comment boxes and does not accommodate a coherent, policy-linked submission with the detailed improvements and proposed wording I have set out in the attached document. In practical terms, it prevents me from contributing meaningfully and risks my submission being reduced to partial extracts or losing its context. I already asked via the email CC'd above for some advice on this, with no response as yet other than it could take 3 days, but expires today.

**Because of the deadline,** I need a clear, practical route that guarantees the submission is:

1. formally accepted as part of the consultation record (with an acknowledgement or reference), and
2. acknowledgement it has or will be seen by the relevant Planning Policy officers for consideration.

**Please can you advise urgently:**

- the correct method to submit this PDF so it is properly logged and considered, and
- who is the accountable officer or team (name or role is fine) who can confirm receipt and inclusion in the representation log.

If I do not receive a response from either of you in time, I will have to proceed to deliver a printed copy by hand to the Council offices and request a receipt. But I would still like to know as stated above.

As ward councillors, I am asking you to support me in ensuring a constituent's representation can be properly made within the consultation process, particularly where the online portal is not fit for submitting structured, detailed evidence and policy improvements of the type contained in the attached document.

I am available today and tomorrow by phone if that is quicker. I have also cc'd in Kevin Foster also as I have previously engaged with him and he wished to be kept up to date on my local work.

Kind regards,

**Rob Alexander**

**EEESafe and LocalitEEE**

[Redacted]

Best Regards

**Robert Alexander**

*Director and Founder EEESafe & LocalitEEE*

**Repairing a broken World One Community at a Time**

**By building Local and Safer Repair Circular Economies**

[Redacted]

[Redacted]



## Torbay Local Plan 2025-45 (Regulation 18) - Representation

**Respondor:** EEESafe and LocalitEEE (Robert Alexander, CEO)

### Key plan references

Draft Torbay Local Plan 2025-45 (Consultation Draft, Nov 2025):

<https://www.torbay.gov.uk/media/2dgles4b/draft-torbay-local-plan-2025-45.pdf>

Local Plan Update consultation page: <https://www.torbay.gov.uk/council/policies/planning-policies/local-plan-update/>

Evidence Base and Monitoring: <https://www.torbay.gov.uk/council/policies/planning-policies/evidence-base-and-monitoring-2025-2045/>

## 3. Identify our interests

### 3.1 Primary interests (what we are responding on)

Our representation focuses on how Torbay can translate circular economy policy intent into deliverable, measurable outcomes at household and community level, with specific emphasis on:

- **Repair and reuse as a core delivery mechanism** for waste prevention and emissions reduction, particularly for electrical and electronic goods.
- **Safety, traceability, and accountability** in repair and reuse systems (who repaired, when, and whether an item is unsafe or recalled).
- Repairs delivered by **Local EEESafe Certified Domestic Appliance Technicians (DAT)** and **UEEESafe Certified repairers**, assessed against safer standards with audit-able traceability through the Appliance Safety Register (Digital Twins).
- **Local value retention and SME enablement** so that circular economy activity builds Torbay-based jobs, skills, and resilience rather than exporting value through centralised models.
- Community wealth outcome: By enabling safer local repair and reuse as standard practice, Torbay can retain spend, skills, and jobs locally - effectively strengthening inclusive growth and narrowing deprivation gaps through practical community wealth outcomes.
- **Digital inclusion** as an enabling condition for modern circular services and citizen participation.
- **Practical pilots and place-based models** that Torbay can use to demonstrate leadership through delivery, not just strategy.

**Additional plan-linked point:** A repair-first approach reduces the volume of bulky WEEE entering collection and disposal routes, reducing handling burdens and costs while supporting the Plan's waste hierarchy priorities (Policy W1).

### 3.2 Relevant plan themes and chapters (where our interests fit)

Based on how the consultation draft is structured, our interests principally relate to these plan chapters:

- Chapter 4 - Building a prosperous and inclusive Torbay (local economic resilience, inclusive opportunity, SMEs and skills).
- Chapter 5 - Thriving communities (wellbeing, safety and belonging, including safety outcomes linked to housing conditions and consumer protection).
- Chapter 7 - Resilient and smart infrastructure (digital systems and the role of practical infrastructure in enabling participation).
- Chapter 8 - Our changing climate (carbon reduction, climate resilience, measurable outcomes).
- Chapter 12 - Responsible resource use: minerals and waste (waste prevention, reuse, repair, resource value retention).

### 3.3 What we are not responding on

To keep the submission focused and useful to the Council, we are not providing detailed commentary on:

- Housing site allocations and spatial distribution (except where relevant to repair, reuse, safety, digital inclusion, or resource systems).
- Matters that are primarily design-code or development management detail (unless directly linked to circular economy delivery infrastructure or safety outcomes).

### 3.4 How this maps to our draft text (so nothing is lost)

Our draft already contains the core thematic points that belong under these interests - repair, reuse, and safety; maximising value and retaining community wealth; digital inclusion; Torbay pilots and place-based delivery; and the delivery ecosystem context.

## 4. Extract the specific policies and sections to comment on

### 4.1 Core policies directly relevant to our points (repair, reuse, safety, local value retention)

Chapter 12 - Responsible resource use (waste and minerals):

- Strategic Policy WS: Waste spatial strategy (pp. 296-297).
- Policy W1: Waste hierarchy and sustainable waste management (pp. 298-299).
- Policy W2: Waste reduction and waste audit for major/significant waste generating development (pp. 299-301).
- Strategic Policy W3: Safeguarding waste management facilities (pp. 301-302).
- Policy W4: Proposals for new waste management facilities (pp. 303-304).

**Additional value retention point:** This includes retaining not only economic value and skills locally, but also the **embedded material value** in repairable goods - reducing losses of high-value metals and components from the local economy through premature disposal or export.

### 4.2 Supporting policies relevant to digital inclusion and community-scale delivery

- Strategic Policy INS: Sustainable infrastructure (pp. 186-188).
- Policy IN2: High quality communications and digital connectivity (pp. 191-193).

**Note:** Policy IN2 is also relevant to digital inclusion reuse pathways, where safer local repair and local retention reduce avoidable transport and support measurable prevention outcomes.

### 4.3 Additional policies we may reference briefly (if helpful)

- Policy CER2: Embodied carbon reduction and assessment (p. 204) - supporting reference for repair and reuse as embodied-carbon avoidance.
- Strategic Policy SC1: Public health and wellbeing (p. 160) - supporting reference for the safety and harm-reduction case.
- Policy TC10: Safer and welcoming town centres for all (p. 153) - supporting reference if positioning safer local repair and reuse as part of safer town centres.

**Plan-linked inclusion point:** Where the Plan is seeking to tackle deprivation and child poverty hotspots, place-based incentives that increase repair and reuse participation can help households retain essential appliances for longer and reduce avoidable replacement costs.

## 5. Draft representations (structured for Torbay submission)

### Representation 5.1 - Strategic Policy WS: Waste spatial strategy (Draft Plan pp. 296-297)

**Policy reference:** Strategic Policy WS: Waste spatial strategy (pp. 296-297).

Draft Plan link: <https://www.torbay.gov.uk/media/2dgles4b/draft-torbay-local-plan-2025-45.pdf>

**Issue:** The Plan commits to maximising the 'value' of household resources, but does not clearly define delivery mechanisms that keep value local, reduce unnecessary transport, and evidence outcomes at community scale.

#### Justification:

- **Local delivery routes matter** - without explicit support for local reuse and repair delivery, resources can flow out of the area via centralised models, weakening local economic resilience and increasing transport impacts.
- **The Plan already frames 'value' broadly** - social, environmental and economic - so it is proportionate to add wording that enables measurement and local retention of those benefits.

**Proposed change:** Add a new paragraph to WS: 'The Council will support place-based circular economy delivery models that retain value locally through repair-first approaches, safer local reuse and refurbishment, and that can evidence household and community-level outcomes (including material savings, safer homes, emissions reductions and local economic benefit)'.  
'

### Representation 5.2 - Policy W1: Waste hierarchy and sustainable waste management (Draft Plan pp. 298-299)

**Policy reference:** Policy W1 (pp. 298-299) - Preparing for Reuse includes checking, cleaning, repairing, refurbishing, whole items or spare parts.

Draft Plan link: <https://www.torbay.gov.uk/media/2dgles4b/draft-torbay-local-plan-2025-45.pdf>

**Issue:** W1 properly includes repair and refurbishment within 'Preparing for Reuse', but it does not address safety, traceability, and accountability risks for repaired or reused electrical and electronic goods. Whilst a good practices, a PAT test does not make an electrical item safe to use. <https://zurl.co/PATTestEEESafe>

#### Justification:

- **Safety and accountability are material** for electrical and electronic goods in second-life markets - traceability (who repaired, when) and preventing recirculation of known unsafe or recalled items supports public confidence and evidenced in a Marketplace, prior to Purchase.

- **Repair-first reduces waste volumes and handling burdens** by preventing usable goods entering collection and disposal routes, supporting the waste hierarchy intent of W1.
- **Policy alignment:** This supports OPSS [Product Recalls and Alerts](#) objectives and strengthens due diligence for online resale channels, aligning with consumer protection expectations under the [Digital Markets, Competition and Consumers Act 2024](#).

**Proposed change:** Add a new clause under W1 requirements: 'Where preparing electrical and electronic goods for reuse (including repair and refurbishment), the Council will support approaches that improve consumer safety and accountability, including the recording of basic repair history, identification of the repairer, and mechanisms that prevent the recirculation of items known to be unsafe or subject to product recalls or safety alerts'.

### **Representation 5.3 - Policy W2: Waste reduction and waste audit for major and significant waste generating developments (Draft Plan pp. 299-301)**

**Policy reference:** Policy W2 (pp. 299-301) - circular economy principles including retention, repurposing, refurbishment, and ease of deconstruction and reuse.

Draft Plan link: <https://www.torbay.gov.uk/media/2dgles4b/draft-torbay-local-plan-2025-45.pdf>

**Issue:** W2 requires circular economy principles for construction and operational waste, but does not explicitly encourage local reuse and repair pathways, nor prompt inclusion of local repair and reuse infrastructure as part of major schemes.

#### **Justification:**

- **W2 already expects operational waste planning** including storage, re-use, recycling and collection - it is reasonable to extend this to 'repair-first' and 'local reuse' pathways where appropriate.
- **Clear wording improves implementation** so that deliverability at household and community scale is explicit rather than assumed.

**Proposed change:** Add a bullet within W2 measures list: 'Support repair-first and local reuse pathways where appropriate, including referral routes to local accredited repair services and community reuse systems that reduce unnecessary transport and retain local economic value'.

### **Representation 5.4 - Strategic Policy W3: Safeguarding waste management facilities (Draft Plan pp. 301-302)**

**Policy reference:** Strategic Policy W3 (pp. 301-302) - safeguarding and continued enhancement of HWRC and Waste Transfer Station.

Draft Plan link: <https://www.torbay.gov.uk/media/2dgles4b/draft-torbay-local-plan-2025-45.pdf>

**Issue:** W3 safeguards facilities and supports enhancement, but does not explicitly encourage integration of safer, local reuse and repair capability as part of enhancement.

#### **Justification:**

- **Enhancement should include prevention outcomes** - if upgrades focus only on conventional waste handling, the opportunity to increase preparing for reuse through repair and refurbishment is constrained.
- **Place-based delivery is consistent with W3** because W3 explicitly supports enhancement and improvement of local waste infrastructure.

**Proposed change:** Add a sentence after the enhancement wording: 'Enhancements should, where feasible, include provision that supports increased preparing for reuse, including safer local repair and refurbishment pathways and associated storage and handling requirements'.

### **Representation 5.5 - Policy W4: Proposals for new waste management facilities (Draft Plan pp. 303-304)**

**Policy reference:** Policy W4 (pp. 303-304) - criteria for proposals for new waste management facilities.

**Draft Plan link:** <https://www.torbay.gov.uk/media/2dgles4b/draft-torbay-local-plan-2025-45.pdf>

**Issue:** W4 provides criteria for new facilities, but does not explicitly recognise smaller, distributed 'preparing for reuse' functions (repair, refurbishment, testing, safer storage) that may sit outside traditional facility models.

#### **Justification:**

- **Distributed preparing-for-reuse capability** can reduce transport, keep value local, and support local SMEs traders and vastly reduce Scope 3 Emissions.
- **Pilot delivery typically needs modest infrastructure** rather than large new sites; recognising this helps the Plan support practical implementation.

**Proposed change:** Add a new criterion to W4: 'Facilities or proposals that enable preparing for reuse, including safer repair, testing, refurbishment and associated storage, will be supported where they demonstrate high standards of safety, independent certification, minimise transport impacts, and contribute to local circular economy delivery'.

### **Representation 5.6 - Policy IN2: High quality communications and digital connectivity (Draft Plan pp. 191-193)**

**Policy reference:** Policy IN2 (pp. 191-193) - high quality communications and digital connectivity.

**Draft Plan link:** <https://www.torbay.gov.uk/media/2dgles4b/draft-torbay-local-plan-2025-45.pdf>

**Issue:** IN2 supports digital connectivity but does not link connectivity to inclusion and participation in modern circular economy systems, where digital channels mediate access to repair, reuse and service delivery.

#### **Justification:**

- **Digital inclusion is an enabling condition** for participation in repair and reuse pathways and associated local services.
- **Digital inclusion and Scope 3:** Torbay's current digital device donation routes can rely on national processing and distribution (for example via the [Good Things Foundation National Device Bank](#)), which can increase transport and handling impacts and provides no assurance that refurbished devices return to Torbay. Our approach keeps assets, skills and outcomes local by working with signed-up third sector partners and local certified repairers, enabling safer reuse and verified outcomes while minimising avoidable logistics emissions.
- **Community-bound digital inclusion controls:** LocalitEEE only operates within the community where goods are registered. Donated IT goods routed through participating organisations in our Sustainable Business Directory remain within the local economy, with defined verification steps (including evidence of charger and battery compliance) before items are placed for reuse. This strengthens the 'safer' basis for digital inclusion and prevents value leakage from Torbay.
- **Safer local digital inclusion:** Where donated IT goods are routed through LocalitEEE participating third sector organisations and the **LocalitEEE Sustainable Business Directory** within the same defined community, items

can be verified as complete and safer to reissue - including evidence that the correct charger is supplied and batteries are compliant - improving safety and accountability while reducing unnecessary transport and Scope 3 impacts.

- **A short addition improves plan coherence** by linking Chapter 7 infrastructure to Chapter 12 responsible resource use objectives.

**Proposed change:** Add a sentence to IN2 explanation: 'Digital connectivity also supports inclusive access to essential local services, including emerging circular economy platforms for repair, reuse, and community participation; therefore, digital inclusion should be treated as an enabling condition for wider plan objectives'. The Council should support place-based digital inclusion approaches that prioritise safer local repair and reuse and can evidence prevention benefits through aggregated, non-personal reporting. This should include support for local third sector delivery routed through community-based directories, with verification controls for donated IT equipment (charger and battery compliance) to strengthen safety and consumer protection outcomes.

### **Representation 5.7 - Strategic Policy INS: Sustainable infrastructure (Draft Plan pp. 186-188)**

**Policy reference:** Strategic Policy INS: Sustainable infrastructure (pp. 186-188).

Draft Plan link: <https://www.torbay.gov.uk/media/2dgles4b/draft-torbay-local-plan-2025-45.pdf>

**Issue:** INS provides a basis for sustainable infrastructure, but does not explicitly recognise that some circular economy outcomes require enabling infrastructure and delivery models, including pilots that can evidence outcomes and be scaled.

#### **Justification:**

- **Pilot-scale delivery supports implementation** by demonstrating measurable outcomes at household and community scale without requiring the Council to commit to specific funding.
- **This strengthens effectiveness** by converting strategic aspiration into practical implementation intent.

**Proposed change:** Add a sentence within INS (or supporting text): 'The Council will support pilot-scale, place-based initiatives that enable delivery of circular economy outcomes at household and community scale, where they are safer, locally beneficial, and capable of generating measurable environmental, social, and economic outcomes'.

## **6. Legal tests - soundness, legality, and consistency with national policy**

### **6.1 Soundness (NPPF tests)**

- **Positively prepared:** Our proposed additions strengthen deliverability of the Plan's stated waste and infrastructure objectives by clarifying practical mechanisms for repair-first, safer reuse and local value retention, without requiring the Council to commit to specific funding.
- **Justified:** The Draft Plan already commits to moving waste up the hierarchy and explicitly includes repair and refurbishment within 'preparing for reuse'. The changes are a proportionate extension that addresses a logical gap - safety/accountability and local delivery routes - rather than introducing a new policy direction.
- **Effective:** The wording improves implementation clarity by introducing support for safer reuse mechanisms (repair history, preventing circulation of recalled/unsafe items) and encouraging local repair and reuse pathways that reduce transport impacts and retain local economic value.

- **Consistent with national policy:** The changes reinforce national policy intent around resource efficiency and the waste hierarchy by making 'preparing for reuse' more robust in practice, particularly for electrical and electronic goods where safety and traceability are material considerations.
- **Measurable monitoring outputs:** A key pilot output is measurable reporting, including aggregated community totals for waste prevented and associated carbon and material savings. These calculations are generated through the LocalitEEE platform from non-personal participation data and can support evidence-led delivery and monitoring.

### National policy references (clickable)

NPPF: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

National Planning Policy for Waste: <https://www.gov.uk/government/publications/national-planning-policy-for-waste>

Waste Framework Directive (2008/98/EC): <https://eur-lex.europa.eu/eli/dir/2008/98/oj/eng>

### 6.2 Legality (process and compliance)

The suggested amendments are minor clarifications and criteria additions that sit within existing Draft Plan policy scope (WS, W1-W4, INS, IN2). They do not introduce new site allocations or strategic changes and are framed to support implementation without fettering decision-making.

**Consumer protection and online sale:** Where online resale or local marketplace activity is enabled, the proposed safety and traceability wording supports compliance with consumer protection expectations (including unfair commercial practices) under the [CMA DMCC Act guidance](#) and reduces risk of unsafe goods being offered to residents.

### 6.3 Internal consistency across the Plan

The proposals link Chapter 12 (resource use and waste) with Chapter 7 (digital infrastructure) by recognising digital inclusion as an enabling condition for participation in modern repair and reuse systems, improving policy coherence without duplicating content.

**Minerals and CRM visibility (community scale):** Because Chapter 12 explicitly covers minerals and waste, our Register-led approach can also support community-level reporting of materials retained in use (for example steel, copper, aluminium, plastics) through repair and verified local reuse. We also see future scope to extend this to indicative critical raw material signals within common electrical products, enabling Torbay to evidence prevention outcomes at scale and contribute to learning that could later be aggregated nationally.

## 7. Cover statement and respondent details

### 7.1 Respondent details (for the consultation form)

- **Name:** Robert Alexander
- **Role:** CEO
- **Organisation:** EEESafe and LocalitEEE
- **Telephone:** 01803 502026
- **Email:** r.alexander@eesafe.com
- **Postal address:** [Insert if required by portal]

## Contact preferences

- **Permission to publish name:** Yes
- **Permission to publish organisation:** Yes
- **Permission to publish email/phone:** No (Council use only)
- **Wish to be notified of submission outcome and next stages:** Yes
- **Wish to participate in further consultation stages if invited:** Yes
- **Wish to appear at Examination hearings (if applicable):** Yes, if matters raised are discussed

## 7.2 About the responding organisation (delivery and relevance)

The responding organisation is a Torbay-engaged [Award-Winning](#) circular economy initiative working in repair, reuse, environment, waste prevention, tackling poverty and UK community-scale delivery models.

**Product safety leadership:** EEESafe has been a member of the **OPSS Business Reference Panel** under **DBT** for 8 years and is engaged in national product safety and circular economy discussions. Our Appliance Safety Register proactively checks registered products against some of the OPSS [Product Recalls and Alerts](#) database and can block resale, notify the Registrant where a product is identified as recalled or unsafe, strengthening consumer protection locally.

- **Relevant CPD completed (CTSI):**

- Introduction to the Digital Markets, Competition and Consumers (DMCC) Act 2024 for Businesses - March 2025
- PAS7100 and PRISM - Product Safety Tools for Businesses - March 2025
- Introduction to Product Safety Standards for Businesses Selling Products Online (Part 1) - February 2025
- Product Safety Compliance for Businesses Selling Products Online (Part 2) - February 2025

**Pilot delivery and reporting:** The pilot uses the LocalitEEE platform within our Appliance Safety Register to produce non-personal, community-level reporting on repair and reuse activity, including aggregated totals for waste prevented and related environmental metrics.

We are preparing a Torbay-based pilot community model (LocalitEEE), for the UK, built into our Appliance Safety Register and intended to demonstrate scalable local delivery. We are not in contract, not funded, and not seeking funding through this consultation. Pilot should begin 2<sup>nd</sup> Qtr 2026.

This work is intended to be piloted locally through **Sustainable Living Torbay**, as a place-based pilot to explore how circular economy principles, repair, reuse, digital inclusion, and evidence-led outcomes can be delivered in practice at household and neighbourhood levels.

**Good Things Foundation and local optimisation:** Torbay's current approach includes supporting the Good Things Foundation, and we have discussed with them that national donation and refurbishment routes can drive additional transport impacts (Scope 3) and may export value from the community. The LocalitEEE model is designed to work with Torbay third sector organisations so that donated devices and appliances can be assessed, repaired to safer standards, and recirculated within Torbay through the Appliance Safety Register, supported by local certified repairers within defined product categories.

With combined experience across appliance and IT repair, our assessed certified repairers link customers and repairers in our Digital Twin register, supporting practical demonstration and learning within Torbay.

**Poverty relevance (plan-linked):** Where the Plan seeks to address deprivation and child poverty hotspots, our model includes ring-fenced community micro-grants (**PLEEECash**) that increase with household and product participation, supporting inclusion and linked in to local 3<sup>rd</sup> Sectors while reinforcing repair and reuse outcomes.

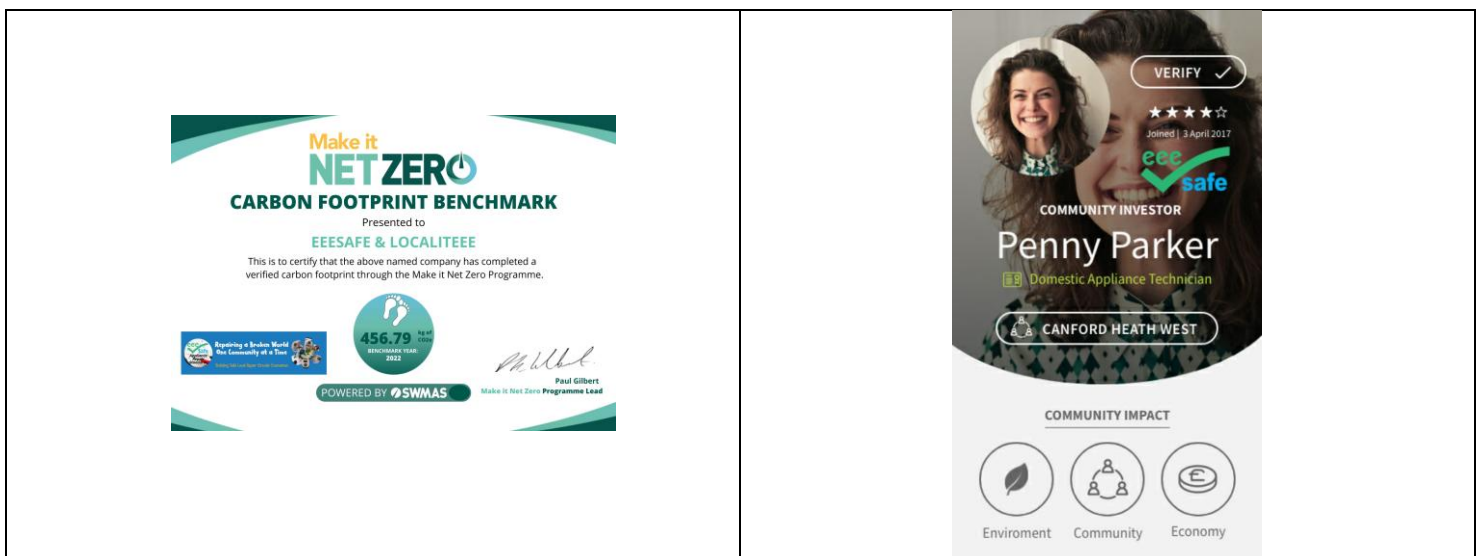
Stakeholders and tools for engagement suit charities, landlords, repair and reuse centres, retailers, support agencies, and insurance companies. **Devon College** has also expressed interest in our **Level 2 Qualification** and training materials as a delivery partner.

**Skills and training pathway:** There is currently **no accessible White Goods Appliance Repair qualification** available to support independent repairers locally at the level required. EEESafe has therefore developed *its own training materials mapped to NOS's* to enable pilot delivery in Torbay, aligned to local skills, employment, and inclusion outcomes in the Plan. **It's a Pathway to Apprenticeships in 3 Sectors.**

**Local value retention mechanism:** Within our model, suitable items can be diverted into supervised training projects, and functional parts and spares can be retained locally and listed via the **LocalitEEE Marketplace** (built into the Register). This means **registered White Goods appliances** can be sold or donated locally with a supporting Digital Twin record, improving buyer confidence and preventing valuable items leaving Torbay.

**Digital Twin control:** Because Technicians are linked to Consumers through the **Digital Twin, Local EEESafe Certified Domestic Appliance Technicians (DATs)** and certified IT repairers can see and act on items placed into the Marketplace by owners (sale or donation), enabling history of product repair, reuse, parts recovery, or onward donation locally - helping prevent valuable items leaving Torbay, whether White Goods or IT Products. This creates a controlled local pathway where White Goods and IT products are retained, repaired, and recirculated locally, rather than defaulting into centralised routes. Asset-Stripping means repairable items leave our Communities.

**Correspondence:** Please contact us by email or telephone only; we do not accept postal correspondence due to the environmental impact of paper waste.



**Repairing a broken World One Community at a Time**  
**By building Local and Safer Repair Circular Economies**