

## Future Planning

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**From:** Beth Huntley [REDACTED]  
**Sent:** 02 February 2026 07:54  
**To:** Future Planning  
**Subject:** Local Plan Reg 18 Representation  
**Attachments:** SSTT Local Plan Reg 18.pdf

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Good morning,

Please find attached the representation from Safe, Sustainable Travel Torbay in response to the consultation on the Draft Local Plan.

While individual members have been encouraged to submit their own comments, this document sets out the position we wish to submit collectively as an organisation.

Kind regards,

Beth

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Beth Huntley  
Chair

Safe, Sustainable Travel Torbay (SSTT) is a Charitable Incorporated Organisation registered in England and Wales (Charity no. 1215897).

*Creating better communities, liveable streets and equitable travel in Torbay through improved infrastructure, investment and culture change.*



# Safe, Sustainable Travel Torbay CIO

Torbay Draft Local Plan Regulation 18

Ensuring the Deliverability of Sustainable Transport and Infrastructure

Date: 31 January 2026

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Safe, Sustainable Travel Torbay (SSTT) is a charity working to create better communities, liveable streets and equitable travel through improved infrastructure, investment and culture change. We welcome the opportunity to comment on Torbay's Local Plan and recognise both the ambition of the document and the very real challenges facing Torbay, including climate change, public health inequalities, transport affordability, accessibility, and historic car dependency. This response has been reviewed and agreed by the Charity's Steering Group.

The Local Plan sets out positive aspirations for sustainable travel, inclusive access and climate resilience, and provides an important opportunity to embed long-term change into the planning framework. However, across several key policies, there remains a lack of clarity, enforceability and defined mechanisms to ensure delivery. The frequent use of wording such as "will be sought," "seek to ensure," and "should" frames essential sustainable transport outcomes as optional rather than required. This weakens confidence that walking, wheeling, cycling, high-quality public transport, and reductions in reliance on private motor vehicles will be delivered consistently alongside development.

While the Plan recognises the importance of sustainable transport, it does not yet consistently apply a vision-led approach to transport planning, nor does it fully embed the priorities of Torbay's climate strategy, Greener Way for Our Bay, into measurable and enforceable policy actions. To be effective in addressing Torbay's challenges, the Local Plan must explicitly require development to deliver safe, accessible and inclusive transport infrastructure that supports integrated places, wellbeing, climate resilience and equitable access to opportunities, rather than relying on aspirational wording or supporting text.

Objectives for walking, wheeling and public transport should be translated into clear delivery requirements, supported by adherence to recognised design standards, measurable targets for modal shift, and robust monitoring through travel plans and the Plan's monitoring framework. Without defined indicators and review mechanisms, it will not be possible to assess whether policies are achieving their intended outcomes or to intervene where delivery falls short.

Strategic walking and cycling routes should be clearly identified within the infrastructure schedule, with phasing, milestones and funding assumptions set out transparently. The Plan should explicitly require developer contributions to this infrastructure, alongside the proactive pursuit of external funding, to ensure delivery is timely and not contingent or aspirational.

Infrastructure essential to sustainable development should be treated as a core deliverability matter, not secondary to other contributions. Qualifying language that weakens obligations should be replaced with clear, consistent requirements that align policy intent with implementation. This will ensure that the Plan's sustainable transport, climate and inclusive growth objectives are realised in practice, providing confidence that development will contribute positively to addressing the challenges facing Torbay rather than compounding them.