
Draft Torbay Local Plan 2025-45: Regulation 19 Draft Local Plan

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on behalf of Vistry Homes Ltd

1. Introduction

This Representation is made in response to the Regulation 19 Publication Version of the Draft Torbay Local Plan 2025–45: ‘A Landscape to Thrive’ (August 2026) (hereafter referred to as ‘the draft Local Plan’). The representation is submitted by Savills on behalf of Vistry Homes Ltd (‘Vistry’), which has an interest in Land north of Long Road, Yalberton, Paignton (‘the Site’). A copy of the Site Location Plan is provided at **Appendix 1**.

The site falls within the ‘Long Road, Yalberton Future Growth Area’ under draft Policy SDP5, which is allocated for a mix of new homes and employment land. Vistry continues to promote the site for a residential-led development of circa 320 dwellings, including a policy compliant level of affordable housing, together with associated open space, green and blue infrastructure, and sustainable transport connections. These representations are supported by an Indicative Masterplan and Vision Document setting out the preliminary proposals for the site.

We previously submitted written representations on behalf of Vistry to the Regulation 18 Draft Local Plan in February 2026. Where the Regulation 19 plan carries forward the same or similar policy wording, and our position is unchanged, we have expressly cross-referred our earlier representations. This is intended to assist the Council and the appointed Inspector by highlighting where previously raised concerns have or have not been addressed.

We note that, as confirmed in Paragraph 1.8 of the Draft Local Plan, the scope of the Regulation 19 Consultation is more narrowly defined than at previous stages and is focused on the soundness of the plan and its conformity with the legal tests. Accordingly, these representations are framed by reference to the tests of soundness set out at paragraph 35 of the National Planning Policy Framework (2024) (NPPF) – namely whether the plan is positively prepared, justified, effective and consistent with national policy – together with the relevant legal and procedural requirements.

With regards to the relevant national policy framework, it is recognised that it is the intention of Torbay Council to submit the Draft Local Plan for examination before 31 December 2026. As such, it is the 2024 NPPF from which the relevant plan-making policy wording should be derived. However, this does not mean that the NPPF published in August 2026 is immaterial to the policies of this emerging plan. The development management policies of the 2026 NPPF are now a material consideration in planning decision making, and any adopted policy which does not accord with them should be given very limited weight. Therefore, it is important that Torbay council do not unnecessarily replicate or seek to override any of the national development management policies within their emerging local plan policies, as these policies could effectively become redundant the moment the plan is adopted.

For the reasons set out below, we consider that the Local Plan is not sound in a number of respects, most significantly in relation to the proposed housing requirement.

Within these representations we either raise concerns or object to some draft policies, or provide comment on the draft policies and, where appropriate, suggest changes we consider are necessary to make the plan sound. We would welcome the opportunity to participate in the Examination in relation to the matters raised.

2. Response to Draft Policies

The following section sets out our responses to a number of the draft policies within the Regulation 19 Draft Plan.

As raised at Regulation 18 stage, we continue to consider that there is a degree of overlap and duplication between the site allocations, the Strategic Development (SD) policies and the 'Future Growth Area' policies (in particular between draft Policies SDP5, H2 and E1). This creates ambiguity in relation to the quantum of development being planned for at Long Road, Yalberton, and should be resolved to ensure the plan is clear, effective and unambiguous, as required by paragraph 16(d) of the NPPF (2024).

Strategic Policy SS1: Torbay Growth Strategy – Prioritising our communities through improved health, housing, place making and opportunities for all

Housing Requirement

We continue to have significant concerns regarding draft Policy SS1, predominantly in relation to the proposed housing requirement and the lack of justification for a requirement that is substantially below the Government's standard method figure. Our fundamental concerns raised at Regulation 18 has not been addressed through any changes as part of the Regulation 19 plan.

The Local Plan continues to propose only 8,000 new homes over the 20-year plan period 2025–45, equating to 400 dwellings per annum. The draft Local Plan (paragraph 2.2 and the explanation to Policy HS) states that the Local Housing Need (LHN) for Torbay, as calculated by the December 2024 standard method, is now 972 dwellings per annum. The proposed requirement therefore represents only around 41% of LHN – an even lower proportion than the 42% we raised concerns over at Regulation 18 stage.

The plan seeks to justify this substantial shortfall by reference to Torbay's environmental, infrastructure and market-capacity constraints, and states that the shortfall against LHN "*requires robust justification, which is set out in the supporting Topic Paper*". As at Regulation 18, we do not consider that vague references to constraints provide sufficient justification for planning to meet less than half of the district's objectively assessed need. The onus is on the Council to demonstrate, through robust and up-to-date evidence, that the shortfall cannot be met within Torbay or, where it cannot, that all reasonable steps have been taken to meet unmet need through effective cooperation with neighbouring authorities under the Duty to Cooperate.

The plan is currently inconsistent with national policy, which requires local plans to meet objectively assessed needs as a minimum unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The Council should be planning to meet the standard method figure as a minimum, and should undertake further work to identify a wider range of deliverable and developable sites to provide choice and competition in the market. The Land north of Long Road, Yalberton is a suitable, available and deliverable site that can contribute positively to meeting that need, and so should remain within the plan as a proposed allocation.

In the absence of any supporting evidence to justify otherwise, the housing requirement should be increased to meet Torbay's LHN in full, or the Council should robustly evidence the maximum capacity of the district and clearly quantify any residual unmet need to be addressed through the emerging Devon Spatial Development Strategy and the Duty to Cooperate.

Minimum 25% employment within Future Growth Areas

As we previously stated in our Regulation 18 representations, we object to the blanket requirement in Policy SS1 for a minimum of 25% of Future Growth Areas (FGAs) to be delivered as employment use. We acknowledge the need to allocate land to meet identified employment needs; however, applying a fixed percentage target across all FGAs, without site-specific evidence of demand, is not justified and risks delivering the wrong type of employment floorspace in the wrong locations.

The delivery of new employment floorspace should be demand-led and directed to sites that can demonstrably accommodate it and where there is an evidenced need. We encourage the Council to reword this element of Policy SS1 so that mixed-use development, including a mix of residential and employment uses, is encouraged and supported within FGAs where appropriate, rather than imposing a rigid minimum percentage. This is addressed further in our responses to Policies SDP5 and E1 below.

Strategic Policy HS: Overall Housing Strategy

Our position on draft Policy HS is consistent with our comments on draft Policy SS1 in relation to the proposed housing requirement and the absence of adequate supporting evidence.

In line with our Regulation 18 representations, our concerns over the overall scale of housing provision applies equally to draft Policy HS, which sets the 8,000-dwelling requirement and the stepped trajectory. We support the principle of a 20-year plan period but have concerns over the housing requirement itself for the reasons set out under Policy SS1.

We also note that the proposed stepped trajectory is heavily back-loaded, with delivery not reaching 400 dwellings per annum until 2035 and the majority of delivery concentrated in the latter half of the plan period. This raises significant questions over the effectiveness of the trajectory and the deliverability of a five-year housing land supply in the early years of the plan, and reinforces the need to bring forward deliverable sites such as Land north of Long Road, Yalberton at the earliest opportunity.

Planning Practice Guidance addresses directly the question of when a stepped housing requirement is appropriate for plan-making. It confirms that a stepped requirement may be appropriate only where there is to be a significant change in the level of housing requirement between emerging and previous policies, and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. The PPG also confirms that strategic policy-makers in these circumstances should *“not seek to unnecessarily delay meeting identified development needs”*.

For these reasons, we consider a stepped trajectory would not be a sound approach, and would be contrary to paragraph 36 of the Framework (2024) on the basis the plan is not positively prepared, and does not seek to meet objectively assessed needs at the earliest practicable point. Instead, we consider the draft Local Plan should be amended to remove the proposed stepped trajectory and replace with a flat annualised housing requirement across the plan period, supported by the allocation of additional deliverable sites capable of delivering in years 1–5 to ensure a five-year housing land supply can be demonstrated at adoption and maintained thereafter.

Strategic Policy SDP1: Paignton – A strategy for sustainable growth

As we previously stated in our Regulation 18 representations, we strongly support the proposal under draft Policy SDP1 to direct growth towards Paignton, and in particular the continued delivery of the Future Growth Area to the west of Paignton, which will be key to enabling the Council to meet its housing requirement over the plan period.

However, as per our previous comments, whilst we support the principle of a master planning exercise to guide development in the FGA, in practice much of the wider growth area has already been developed or is under construction. These developments have come forward independently and are not necessarily future-proofed to enable a meaningful, comprehensive master planning exercise across the whole area. Therefore, whilst the principle of a masterplanning exercise is supported, individual sites, such as the Land north of Long Road, Yalberton, should not be held up by the preparation of an FGA-wide masterplan, and there should be flexibility to ensure site-specific proposals are able to proceed in parallel.

Strategic Policy SDP5: Long Road, Yalberton – Sustainable living and employment neighbourhood

In line with our comments related to draft Policy SDP1, we strongly support the allocation of the Long Road, Yalberton Future Growth Area, the development of which will be vital to enabling the Council to meet its housing requirement over the plan period. As demonstrated within the Sustainability Appraisal which underpins the Regulation 19 plan, the proposed allocation has a positive effect when assessed against the 13 sustainability objectives. The Land north of Long Road, Yalberton forms a key component of this allocation, and we fully support its continued inclusion in the plan.

Notwithstanding our in-principle support, we continue to have questions over the clarity around the proposed scale of development for the FGA and site itself, and the way in which this is expressed in the draft Local Plan. For example, Criterion (i) of Policy SDP5 refers to ‘an additional 650 dwellings’, whilst the explanatory text (paragraph 2.35) indicates that at least 200 additional dwellings are expected beyond those already allocated/committed at Berry Acres, Devonshire Park and Inglewood. As we previously stated, the policy should make explicitly clear the total number of new (unbuilt) dwellings being allocated, together with a breakdown of the existing commitments and previously identified sites that make up the remainder. This is necessary for the draft policy to be effective and unambiguous.

As demonstrated in these representations, the Land north of Long Road, Yalberton is available and capable of delivering approximately 320 dwellings. If, as the explanatory text suggests, at least 200 previously unallocated dwellings need to be identified within the FGA, the site is capable of accommodating that figure in full and more, making it a crucial element of the allocation.

Furthermore, we continue to have concerns regarding the requirement for 25% of the area to come forward as Class E(g), B2 or B8 employment, delivering at least 20,000 sq m of industrial development, and the safeguarding of that land for such purposes. As we previously stated in our Regulation 18 representations, employment uses should be directed to sites that can demonstrably accommodate them and where there is an evidenced need; the blanket approach is not justified.

Specifically, the southern part of the site at Long Road, Yalberton, which will be required to deliver drainage attenuation and the main site access, should not be safeguarded for employment as it is shown in the consultation document. This is addressed further under draft Policy E1.

In terms of Criteria (viii) and (ix) of Policy SDP5, and paragraph 2.36 of the supporting text, this refers to a strategic landscape buffer and to the potential future designation of the Yalberton Valley as a Conservation Area. Whilst the reference to a potential Conservation Area is a new element compared with the Regulation 18 draft, our position on landscape matters is broadly the same as previously expressed.

We do not object in principle to appropriate strategic landscaping to protect the character and setting of Higher and Lower Yalberton; however, any such buffer, and any future Conservation Area designation, must be justified by robust evidence and defined with sufficient precision so as not to unduly constrain or delay the delivery of the proposed allocated development. A landscape-led scheme, of the type being progressed for the Land north of Long Road, can conserve and enhance the relevant landscape and heritage assets while delivering much-needed housing.

As a minor point, it is also noted that the supporting text in paragraph 2.36 has a repeated first sentence, which should be amended.

Strategic Policy H2: Future Growth Areas

We continue to strongly support the identification of the west of Paignton FGA and the inclusion of the Land north of Long Road, Yalberton within it. However, we continue to consider that further clarification is required to align Policy H2 with Policy SDP5.

There remains a discrepancy between the indicative dwelling figures. The Policy H2 table (and Table 6) identifies 700 dwellings for 'Long Road, White Rock and Inglewood, Paignton (and BCG Villages)' (reference H2P.2), whilst Policy SDP5 refers to an additional 650 dwellings. The identification of an FGA in Policy SDP5 and the separate identification of component sites through Policy H2 is not objectionable in itself, but the way in which the figures are presented remains ambiguous and internally contradictory. The two policies should be carefully reviewed and reworded so that it is explicitly clear how many dwellings are being allocated, how many are existing/committed as opposed to new, and which HELAA sites are included. This is necessary for the plan to be effective and internally consistent.

Also, we reiterate our concern previously raised at Regulation 18 stage regarding the requirement for a comprehensive FGA-wide masterplan. Given that much of the wider FGA has already been developed or committed, the value of a retrospective FGA-wide masterplan is limited, and proposals for the Land north of Long Road should not be delayed pending its preparation.

Policy H7: Affordable Housing

We continue to be broadly supportive in principle of the proposed 30% affordable housing requirement for sites of 20 or more dwellings outside the South Devon National Landscape. Vistry's proposals for the Land north of Long Road would deliver 30% affordable housing (approximately 96 units), consistent with the policy requirement.

As we previously stated, however, the affordable tenure mix should be based primarily on up-to-date local evidence of need for the specific site area. Policy H7 seeks a mix of 70% Social Rent and 30% Intermediate housing; the policy should be worded to make clear that this generic mix will be sought where supported by up-to-date local evidence, or in the absence of such evidence, and that it will be applied flexibly having regard to viability. We also reiterate that, whilst the principle of integrating affordable housing is supported, the policy language on design and integration should be careful not to be so prescriptive as to conflict with the clustering and management requirements of registered providers, which could otherwise make the overall requirement harder to deliver. We encourage the Council to ensure the supporting viability evidence robustly demonstrates that the cumulative policy requirements, including 30% affordable housing, are deliverable.

Policy H9: Self-build housing in Future Growth Areas

Whilst we continue to support the Council's aspiration to deliver a diversified range of housing, we encourage the Council to ensure that the self-build requirement within FGAs is soundly based on clear, up-to-date evidence of local need. We note that the Regulation 19 plan now requires a minimum of 1% of dwellings within FGAs to be provided as serviced self-build plots, a reduction from the 2% required in the Regulation 18 draft, together with the requirement in Policy SDP5 for at least 12 serviced plots. Whilst the reduction to 1% is welcomed, the requirement should still be justified by evidence of demand, for example through the Council's Self-Build Register. The policy's flexibility provisions which allow plots to revert to affordable housing where there is no take-up are welcomed and should be retained.

Policy H11: Specialist housing for people in need of care or support

Whilst we broadly support the Council's aspirations in relation to specialist and accessible housing, we consider that the requirements should be based on clear, up-to-date evidence of local need. Policy H11 requires all major developments to provide a minimum of 25% of new homes to Building Regulations Part M4(2) (accessible and adaptable dwellings) standard. Whilst we do not object in principle, the requirement should be supported by robust evidence in the Housing Needs Assessment and applied with appropriate regard to viability and site-specific circumstances, consistent with national Planning Practice Guidance on optional technical standards.

Policy E1: Strategic employment land allocation

As we previously stated in our Regulation 18 representations, we object to the extent of draft employment allocation E1P.5 (Land at Long Road / Lower Yalberton Farm Holiday Park), which is identified in the Regulation 19 plan as a 4.7ha allocation (HELAA reference 21P012).

This draft allocation includes part of the land which Vistry Homes Ltd is promoting for residential development. As demonstrated by the Indicative Masterplan at **Appendix 2**, the majority of the southern field under Vistry's control is required for drainage attenuation and the main vehicular access serving the wider residential development to the north. Whilst we do not object in principle to employment provision within the wider FGA, nor to employment floorspace on the parts of E1P.5 outside Vistry's control, we maintain our objection to the extent of E1P.5 as currently drawn.

We therefore request again that draft allocation E1P.5 is amended to exclude the part of the site controlled by Vistry Homes Ltd, which is required to deliver drainage infrastructure and access for the residential development (referenced in the HELAA as sites 21P067, part of 22P001 and part of E1P.5). In addition, any allocation on the remaining extent of E1P.5 should exclude B8 (storage and distribution) uses on residential amenity and access grounds. As explained, the site would be served by a single vehicular access from Long Road, and it would be inappropriate to provide residential and industrial (particularly B8) traffic via the same access point. We note that the general requirement in Policy E1 for a minimum of 50% Class B2 or E(g) provision reinforces the need for the extent and mix of E1P.5 to be reconsidered in light of these constraints.

Policy CER1: Net zero carbon development standards

Policy CER1 requires residential development to achieve, as a minimum, a 75% reduction in carbon dioxide emissions relative to Part L of the 2013 Building Regulations, and requires FGAs and all major greenfield sites to achieve net zero carbon emissions through solar PV or other measures, together with local energy network assessments and other requirements. Whilst Vistry Homes Ltd is fully committed to delivering high-quality, energy-efficient and climate-resilient homes, we object to Policy CER1 as currently drafted on the grounds that it is not justified and risks being inconsistent with national policy and the direction of the Future Homes Standard.

The policy sets local energy efficiency and carbon standards that go beyond the requirements of the Building Regulations and the emerging Future Homes Standard. Any such standard must be robustly justified by evidence, including a whole-plan viability assessment demonstrating that the cumulative requirements are deliverable without undermining the delivery of market and affordable housing. There is also a risk of unnecessary duplication with, and potential conflict against, national Building Regulations and the Future Homes Standard, which are the Government's established mechanism for reducing operational carbon. We request that the policy is amended to align with national standards, or that clear, up-to-date viability and technical evidence is provided to justify the more onerous local requirements, and that appropriate flexibility is built in to reflect site-specific viability.

Policy CER2: Embodied carbon reduction and assessment

While the objective of reducing embodied carbon and committing to sustainable construction practices is broadly supported, Policy CER2 should remain proportionate and should avoid duplicating national standards. The requirement for major development to submit an embodied carbon assessment should use a recognised, nationally consistent methodology, and the policy should be clear that it introduces consideration and reduction of embodied carbon rather than setting a fixed numerical target for which no established national baseline yet exists. We welcome the acknowledgement in the supporting text (paragraph 8.39) that reducing embodied carbon is difficult to achieve and that no target is set through the policy.

Policy NC2: Species of principal importance

The broad objectives of Policy NC2 are supported, however the per-dwelling enhancement metrics in Policy NC2 (2–4 integrated bird boxes such as swift bricks, 1–2 bat boxes and 1 bee brick per dwelling or per 100 sq m of non-residential floorspace) should be expressed as guidance and applied flexibly and proportionately at the reserved matters stage, having regard to the specific ecological context of the site and the overall Biodiversity Net Gain and Habitats Regulations mitigation strategy. This will ensure the policy is effective without being unduly prescriptive.

Policy ER2: Drainage Hierarchy

The current wording of Policy ER2 is not considered effective. As written, the policy conflicts with itself by saying that development “*must not discharge surface water in the combined sewer network*”, but then immediately states that where it is “*robustly demonstrated to be the only feasible option, appropriate mitigation must be secured to ensure no overall increase in the volume and rate of surface water discharge to the combined sewer network*”. Clearly, therefore, there are scenarios in which it is acceptable for surface water to be discharged into the combined sewer, and having wording within the policy stating this “*must not*” happen is contradictory and confusing. The policy should be reworded to clearly state that discharge of surface water to the combined sewer network can only happen when it is appropriately mitigated.

Policy ER3: Water Management

Policy ER3 requires all new homes to achieve a water efficiency standard of no more than 100 litres per person per day (l/p/d). This is a tighter standard than the 110 l/p/d optional requirement in Part G of the Building Regulations and, as such, requires exceptional justification in accordance with national Planning Practice Guidance. In order for the policy to be legally compliant, the council must robustly demonstrate the exceptional circumstances necessary to justify a standard more stringent than the Building Regulations optional standard. To simplify matters, the policy should be worded to defer directly to the standard set within Building Regulations.

Policy SC4: Sustainable food production and land protection

Vistry supports the principle of promoting food growing opportunities as part of new developments.

However, in our view draft Policy SC4 should be amended, specifically with reference to the loss of BMV land. The policy should make it clear that the need to consider if there is an overriding need for the development should not apply to those sites already allocated in the plan. In such cases, the loss of agricultural land has already been considered and accepted as part of the strategy, and the policy should not therefore be applied so as to frustrate or delay the delivery of allocated housing. On-site food-growing provision should be proportionate to the scale of development and reflect site-specific circumstances in order to ensure the Local Plan is consistent.

Policy DE3: Development amenity and living standards

The objective of securing a good standard of amenity for future residents is supported. However, the amenity space standards set out in Policy DE3 (a minimum of 10 sq m for apartments and 55 sq m for houses) should be expressed as guidelines rather than rigid requirements, so as to retain design flexibility and enable land to be used efficiently. This is consistent with the plan's own emphasis (Policies H4 and DE1) on optimising densities and making the best use of land. A degree of flexibility will allow high-quality, well-designed schemes to be brought forward that make efficient use of land while still delivering good living conditions.

Policies INS and IN1: Sustainable infrastructure and Prioritisation of planning obligations

Vistry supports the principle of securing the infrastructure necessary to make development acceptable in planning terms and the priority order for planning obligations set out in Policy IN1. However, in order to ensure that the plan as a whole is sound, the cumulative burden of Section 106 and infrastructure requirements including affordable housing, Habitats Regulations mitigation, drainage and water infrastructure, education, healthcare, sustainable transport and the various contributions sought throughout the plan must be tested against, and be consistent with, the whole-plan viability evidence. The priority order in Policy IN1 should be applied pragmatically to ensure that the plan's requirements do not, in combination, render development unviable and thereby undermine the delivery of housing, including affordable housing. We welcome the recognition in Policy IN1 that viability may justify a review of contributions, and the inclusion of deferred-calculation mechanisms.

3. Land north of Long Road, Yalberton

Within our Regulation 18 representations, it was demonstrated that the proposed scheme at Land north of Long Road, Yalberton is capable of delivering the residential development necessary for housing growth within the FGA. This section reiterates that same position.

The Land north of Long Road, Yalberton lies within the Long Road, Yalberton Future Growth Area under draft Policy SDP5 and is assessed within the Council's HELAA as sites 21P067 (Land North of Lower Yalberton Holiday Park), part of 22P001 (Yalberton Holiday Park / Berry Acres 'Link') and part of E1P.5 (Land at Long Road / Lower Yalberton Farm Holiday Park). We fully support the inclusion of the land as part of the allocation and, as we specified at Regulation 18 stage, we maintain that the site is entirely suitable, available and deliverable.

The site extends to approximately 19ha and comprises a mix of agricultural land and the Lower Yalberton Farm Holiday Park. It is well located to access a range of local services and facilities, with four supermarkets, employment areas, two primary schools, equipped play areas and public open space within approximately 1.5km, and is well served by bus services at South Devon College. As set out in our Regulation 18 representations, the site accords with 20-minute neighbourhood principles and offers strong opportunities to travel by sustainable modes.

The proposal is for a residential development of up to approximately 320 dwellings, 30% of which would be affordable (up to approximately 96 affordable homes), together with public open space, new pedestrian and cycle links, biodiversity net gains, sustainable drainage, landscaping and ecological mitigation (including dark corridors for protected species). These proposals are illustrated in the Vision Document (**Appendix 3**) and Illustrative Masterplan (**Appendix 2**).

Since the Regulation 18 consultation, the proposals have continued to evolve, informed by ongoing technical work in relation to highways and access, ecology, landscape and visual matters, arboriculture, and flood risk and drainage. Some of that work has also been discussed with officers at the council as part of ongoing dialogue over the emerging masterplan for the site. That work confirms that the site can be delivered by means of a safe and efficient highway solution, that there are no overriding ecological constraints, that a landscape-led scheme can conserve the character of the area and the setting of the SDNL, and that the development will be safe from flood risk and can manage surface water sustainably. Vistry Homes Ltd remains committed to working closely with the Council to bring the site forward.

However, as set out in Section 2, we maintain our concerns regarding the blanket 25% employment requirement within the FGA, the need for a comprehensive FGA-wide masterplan, and the extent of the employment allocation (E1P.5) over the southern part of the site required for drainage and access. Importantly, and consistent with our position at Regulation 18, proposals for the site should not be held up by an FGA-wide masterplanning exercise, and we suggest that the approach to any masterplan is discussed further between Vistry Homes Ltd and the planning policy team.

4. Summary and Conclusions

In summary, and consistent with the position set out in our Regulation 18 representations:

- We fully support the continued inclusion of the Land north of Long Road, Yalberton as a draft allocation for development within the Long Road, Yalberton Future Growth Area (Policy SDP5). The site is suitable, available and deliverable, and can accommodate approximately 320 dwellings, including 30% affordable housing.
- We have significant concerns over the proposed housing requirement (Policies SS1 and HS), which, at only around 41% of Local Housing Need is not positively prepared, justified or consistent with national policy. The Council should plan to meet its housing needs in full, or robustly evidence its maximum capacity and clearly address residual unmet need. The proposed stepped trajectory is not sound and should be amended.
- We object to the blanket 25% employment requirement within Future Growth Areas (Policies SS1 and SDP5) and to the extent of employment allocation E1P.5 (Policy E1), which should be amended to exclude the land required for drainage and access and to exclude B8 uses.
- We seek clarification of the dwelling figures across Policies SDP5 and H2 (650 versus 700 dwellings) so that the plan is effective, unambiguous and internally consistent.
- We object to Policy CER1 (net zero carbon standards) as not justified and potentially inconsistent with national policy and the Future Homes Standard, and raise comments on Policies CER2, H7, H9, H11, NC2, ER2, SC4, DE3, and INS/IN1, as set out above.

We would welcome the opportunity to engage further with the Council and to participate in the Examination, and we remain committed to working proactively to bring forward the Land north of Long Road, Yalberton to help meet Torbay's pressing housing needs.

Appendix 1: Site Location Plan



Appendix 2: Illustrative Masterplan



Appendix 3: Vision Document
