



21 September 2026

Torquay Neighbourhood Plan Forum Response to Local Plan Reg 19 document

The Forum is pleased to note that a number of revisions proposed by the Forum have been implemented. Overall, we consider the document is generally acceptable, but we recommend some changes as listed below. There are a number of typographical errors that should be corrected during detailed proof reading.

Location	Comment
Page 26, Item 1.46	Add: "The Plan also seeks to protect and conserve the rural villages in Torquay: Cockington, Edginswell and Maidencombe in accordance with Neighbourhood Plan Policies"
Page 32, Other Housing Allocations	Flood risk is a major concern for Torbay. Therefore we recommend adding a further item to The proposal is subject to an environmental assessment that shows that: "iv) it must not increase flood risk."
Page 32 Explanation Item 2.1	Reference also needs to be made to 'Village envelopes'. Recommend revision: "The term "settlement boundary" is defined in the NPPF, and has the same functional meaning as "within the built up area" <u>or</u> <u>"within the Village Envelope".</u> "
Page 69 Item 3.15	Recommend add text as shown: "Proposals on unallocated greenfield sites outside of the settlement boundary (i.e. in the Countryside Area) are likely to be in conflict with <u>both</u> the Local Plan's strategy and <u>Neighbourhood Plan Policies</u> ; therefore <u>they</u> will not be supported unless some other material consideration indicates otherwise."
Page 82, H3T.1 Maidencombe North of Sladnor Park	The Forum supports the Maidencombe Residents' Association response. Site 21T065 is not sustainable development owing to drainage, access (all residents will require cars as walking & cycling is unsafe), and impact on protected species. It is outside the Settlement Boundary, does not comply with NPPF S5, nor does it comply with NPPF Section 18. It should be removed, reducing the total for H3T.1 to the 20 from 21T143.



Page 82, H3T.2 Sladnor Park.	Site 21T064 Sladnor Park is not a sustainable development location at the scale proposed due to drainage, access by walking and cycling, impact on protected species, and provision of a low carbon development. The High Court decision did not establish the principle of development. It was a legal interpretation that the 2006-2009 retirement village development had commenced. The subsequent Appeal decision by the Inspector confirmed that development could continue provided that it complies with all the Conditions in the original 2006-2009 Decision Notices, and compliant with current design regulations, of which compliant drainage design is a key condition. It does not of itself establish the right to build a completely different housing scheme. The 2006-2009 scheme comprised 24 assisted living units, 92 care suites and a 90 bed care unit spread across 4 buildings. The impermeable area for 120 dwelling houses would increase significantly with the greater footprint per dwelling and the necessary access roads. There would be a major adverse impact on both surface water and foul wastewater drainage. There would be a large increase in flood risk to the lower part of Maidencombe. Such a development would be outside the Village Envelope defined in Policy L1, and incompatible with the Guidelines in the Landscape Character Assessment. It would also be in breach of Policy L3: Coastal landscape. In addition Greater and Lesser Horseshoe bats have been recorded on the site along with Cirl Bunting and other protected species. The allocation should be reduced to 36 dwellings comprising 16 houses and two 10-units apartment buildings which could be built on the footprints of previous buildings, and have less impact on flood risk and foul drainage. Amend text as follows: “Sladnor Park, Maidencombe. Due to High Court decision the ~~principle of development has been established~~, 2006-2009 120 unit retirement village had legally commenced, see application P/2020/0315* “ ~~120-36~~ “21T064 ~~Subject to successful resolution of drainage issues.~~ Due to its location within the undeveloped coastal landscape, the bulk of the site will remain outside of the settlement boundary, with the exception of the development area broadly corresponding to the previously developed area of Sladnor Park. The footprints of previous development could accommodate 16 houses and two 10-unit apartment buildings, provided that drainage design meets requirements.”
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Page 144 Policy TC3	Item v) from Policy TC2 should be included in Policy TC3 for St Marychurch, and Preston if Paignton NF agree. “New retail and other main town centre uses within St Marychurch and Preston District Centres will be supported where: a. It is of a scale appropriate to the nature and size of the Centre and complements its role and character; ~~and~~ b. It provides for and sustains a range of services and facilities which contribute to the long-term vitality and viability of the Centre and the ability of people to meet their needs locally; and c. it retains active ground floor frontages such as shopfronts within Primary Shopping Areas.”
Page 178 Policy TA3	Access for emergency vehicles should be specified. Recommend adding a paragraph: “For developments of 100 or more houses, two safe access routes of sufficient width and turning space must be provided for emergency vehicles, specifically fire appliances.”
Page 199 Policy CERS Item iii)	Need to include other sources of energy demand such as 24/7 pumping of waste water. Recommend: “iii) Minimise energy demand from heating, ~~and~~ cooling, and other sources ~~energy demand~~ and associated emissions of greenhouse gas emissions, using, for example, layout, orientation and built form.”
Page 232 Policy L1	The Torquay Neighbourhood Plan will include Village Envelopes for Cockington, Edginswell and Maidencombe, so this needs to be reflected here, and the Policies Maps amended. “Village Envelopes in Cockington, Edginswell, Maidencombe and Churston/ Galmpton are defined on the Policies Map, and specified in the Neighbourhood Plans. Outside settlement boundaries and Village Envelopes, the following forms of development may be permitted, ...”
Page 243 Item 9.20	The Torquay Neighbourhood Plan is being updated, waiting for the Local Plan to go for examination. Suggest delete “made (adopted 2019)”. Also we assume the BCG emerging Neighbourhood Plan will have Green Spaces defined.

