



Torbay Local Plan Publication Stage Representation Form

**Ref:
LP192026**

Name of the Local Plan to which this representation relates:

Torbay Local Plan
Regulation 19
Publication Version

Please return to Torbay Council by end 24 September 2026

Data Protection Privacy Notice - A copy of your representation(s) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector). All representation(s) will be made available in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on Torbay Council's webpages.

Please read the Representation Guidance Note on our webpages before you complete this form.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1.

Personal
Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if
applicable)

Title	Mr	
First Name	Iain	
Last Name	Masters, MRICS	
Job Title (where relevant)	Estates & Development Manager	
Organisation (where relevant)	Devon & Cornwall Police	
Address Line 1	Building & Estate Dept	
Line 2	Police HQ	

Line 3	Middlemoor	
Line 4	Exeter	
Post Code	EX2 7HQ	
Telephone Number		
E-mail Address (where relevant)	Iain.MASTERS@devonandcornwall.pnn.police.uk	

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	TC10	Policies Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	Yes	No
4.(2) Sound	Yes	Yes	No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan please also use this box to set out your comments.

The relevant policing area which covers the Torbay Local Plan is focussed around the three main towns of Torquay, Paignton and Brixham. Both Torquay and Brixham are served by existing Police Stations, while in Paignton, the Police have an office within the Paignton Library and Information Centre. Please note that we comment on matters that concern the Police's existing Estate within Torbay in our response to Policy SC5.

The proposed growth and development planned for the planning authority area over the next 15-20 years - save the implications of LGR which has been placed 'on pause' - will result in an increased population that will have consequential impacts on crime, disorder, and public safety leading to an increase in the number of incidents that the Police have to respond to.

As such, the policies within the new Local Plan should be consistent with the Rule of Law to be able to achieve the "safe places" which are fundamental to the achievement of sustainable development contained within the Government's National Planning Policy

Framework (NPPF). It follows that the Council's primary duties above all else should be to make planning policies that seek to uphold the Rule of Law and recognise that "*public safety is the state's first job*" which was recently stated by Sir Mark Rowley, Commissioner for the Metropolitan Police.

It is therefore important that emphasis is placed on maintaining visible and accessible policing provision including Police infrastructure in the new Plan, particularly in those locations where there is a need for town centre policing to be able to respond to the key issues of violent crime, especially against women and girls; anti-social behaviour; drug and alcohol misuse; vulnerability demand and safeguarding; road safety; and the pressures from seasonal tourism. These are likely to be the key concerns of the local communities and our partners; and together with the Police, the Local Plan should help to identify long term solutions to tackling these local problems.

The Police continues' to strongly support the draft wording proposed in Policy TC10 which clearly recognises those uses or developments that have an impact on "*policing*" in the town centres which "*will be required to make appropriate contributions towards the costs of monitoring, maintaining or policing arising from the development.*"

The Police have a responsibility to police new developments and uses in the town centres to the same level as that of existing developments without detriment to them, and as such they cannot be expected to meet the cost of the additional Police infrastructure required from their existing budgets. Therefore, we are pleased to note that Policy TC10 provides the mechanism to make appropriate contributions available to the Police to support measures towards the policing of the town centres, harbourside and waterfront to ensure that they are safe and welcoming for all.

The Police are therefore content that draft Policy TC10 meets the tests of soundness; as proposed, it will enable the Police's infrastructure needs for the area to be met and which are justified based on the most up-to date information received from DCP. Furthermore, it will be effective over the Plan period by making the town centres, harbourside and waterfront safe and welcoming for all. As such, this is consistent with the NPPF (2024), in particular the social objective for sustainable development, which recognises "*safe places, with accessible services*" as key within paragraph 8b). It also complies with Section 17 (1) of the Crime and Disorder Act 1988 which places a duty on all local authorities to consider crime and disorder implications when formulating policy and determining planning applications for any new development or uses in Torbay.

No further modifications to Policy TC10 are sought.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.