

## Future Planning

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**From:** Chair - Torquay Neighbourhood Plan [REDACTED]  
**Sent:** 01 February 2026 09:36  
**To:** Pickhaver, David; Future Planning  
**Subject:** Torbay Local Plan Reg 18 Consultation  
**Attachments:** TNFReg 18 Text & Policies.pdf; TNF Reg 18 Housing sites.pdf

David - thank you for coming along to our Steering Group Meeting in December. Since then, the Steering Group members have been undertaking a detailed review of the draft document, and our comments are in the attached files.

I have not registered the Forum on the website as it will take a long time to submit to each individual item, and the 100 word limit could be a problem.

I hope you will be able to work from these tables. Please let me know if you have any questions

Kind regards  
Rodney

Dr R L Horder  
Chair  
Torquay Neighbourhood Plan Forum



## Torbay Local Plan 2025-2045 Reg 18 Consultation

### Torquay Neighbourhood Forum Response to text and Policies

Chapter/Policy	Details	Forum Comments
<b>Chapter 1</b>	<b>Our shared vision</b>	
1.51	Strategic Priority 4: Protect Torbay's Natural, Cultural and Built Heritage	FIFTH OBJECTIVE: To safeguard heritage assets .... Statement should be strengthened by amending to state "To preserve, safeguard and protect heritage assets from inappropriate development, giving absolute priority to the safeguarding of heritage assets in conservation areas..."
1.56	Sustainability Appraisal	We can support provided that Council and Planning Officers are serious about quality builds that reflect existing heritage and current needs and that can be delivered. Good that it has an Urban regeneration focus/aspiration and recognises potential environmental impacts of development on green spaces, and the need to protect heritage assets. Acknowledges challenges – deprivation, ageing population, housing challenge. Key sustainable objectives seem sound – protecting the environment, more prosperous and healthier Bay
1.59	Infrastructure	Improved walking and cycling much greater priority than a ferry service across the bay. The ferry service should be removed as it will do little to improve transport for commuters and students, as the vast majority of the buildings they would be going to are inland. No committed infrastructure improvements or infrastructure delivery plan
<b>Chapter 2</b>	<b>Shaping our places</b>	



Chapter/Policy	Details	Forum Comments
Policy SS1	Torbay Growth Strategy	<p>Balances pro-growth stance, with a significant caveat: the presumption in favour of development does not apply where it would conflict with policies meant to protect specific heritage assets or designated areas (like Conservation Areas). Just don't think what they hope to achieve will be achievable given National Planning Policy</p> <p>Pride in Place Priorities:            Maximise heritage and cultural opportunities...            Whilst the general ethos of this statement is supported, it needs to state HOW this will be ensured.</p> <p>Amend the phrase to "Maximise heritage and cultural opportunities for the enjoyment and benefit of residents and visitors by prohibiting greenfield development in conservation areas and of listed buildings unless the benefit wholly outweighs the harm"</p>
Policy SDT1	Torquay – A strategy for sustainable growth	<p>Commits to Torquay's growth being of high-quality design that respects its historic character</p> <p>"brownfield first" development in highly accessible locations.</p> <p>Protects the Belgravia and Harbour Conservation Areas if only! There will be an expectation that this is delivered on as countless examples of it not being.</p>
Policy SDT2	Torquay Gateway – A sustainable growth hub for homes, jobs and nature	<p>While we broadly support the aspirations to transform the Torquay Gateway into a high-quality urban entrance and innovation hub, this support is contingent upon environmental and ecological considerations being positioned front and centre.</p> <p>Given the site's sensitivity as a sustenance zone for Greater Horseshoe Bats and its role in the local green infrastructure, development must go beyond token mitigation to ensure genuine biodiversity net gain. Regarding the proposed Edginswell Railway Station, we are not entirely convinced of the operational necessity for a station at this specific location and believe the focus should remain on robust, landscape-led masterplanning.</p> <p>Document states: "A high quality of design <b>will</b> be required to enhance the built and natural environment, strengthen the sense of arrival into Torbay, and protect the green gap between Torbay and Kingskerswell." Replace "<b>will</b>" with "<b>shall</b>".</p> <p>Add reference to Torbay Council's SPD on Good Design.</p>



Chapter/Policy	Details	Forum Comments
Policy SDT3	Newton Road to Torre Gateway	We broadly support the aspirations of Strategic Policy SDT3, particularly the emphasis on active travel and significant public realm improvements, which are essential for transforming Newton Road into a healthy, sustainable corridor. We are also pleased to see the focus on high-quality connectivity between the Hospital and Town Centre. Furthermore, we believe there is substantial untapped potential for mixed-use development on existing industrial estates; many of these are currently low-level structures where there is clear scope to encourage residential units above commercial spaces. This approach would maximize land efficiency while supporting the plan's "brownfield first" regeneration goals.
<b>Chapter 3</b>	<b>Housing and Regeneration Policies</b>	
Policy HS	Overall Housing Strategy and Presumption in favour of Urban Regeneration	Good to see, its recognition of the unique physical and geographical constraints that prevent Torbay from meeting unrealistic government housing targets. As a coastal community with significant infrastructure limitations, we must prioritise "brownfield first" regeneration over greenfield sprawl. The Forum supports the strategic priorities for housing, especially the focus on 30% affordable housing and infrastructure-led growth to ensure local services are not overwhelmed. Most importantly, environmental and ecological considerations must remain front and centre; our biodiversity and protected landscapes are finite assets that require robust protection as the foundation of any sustainable development strategy. Proposals for Maidencombe not consistent with "Major greenfield development outside of the built-up area or Future Growth Areas will be resisted"
Interactive map	Interactive map layers for Policies H1/H2 and H3 which accompanies the Draft Local Plan	The areas shown on the map do not accurately show the areas of the housing sites which have been consented. For example, the development at Stoodley Knowle (H3T.22, 80 dwellings consented) does not distinguish between the entirety of the site and the area which has actually been approved for development (which is less than half the total area, and is limited to the south western portion only). <b>The map must accurately portray the actual development areas and not the entirety of the site.</b> To show otherwise wrongly implies significant further development potential.



Chapter/Policy	Details	Forum Comments
Policy H1	Town Centre Regeneration Areas	<p>Support focus on TC regeneration, and welcome the 'hotels to homes' approach, which provides a pragmatic solution for repurposing underused buildings into much-needed housing, but must be outside of CTIA's and it needs to be recognised that both of the above are unlikely to provide homes with much outdoor space so protecting our green spaces within the Town is crucial. Must be high-quality design that removes existing 'eyesores' and respects our unique heritage. Document states <i>"Proposals <b>should</b> promote good design..."</i> Change "should" to "<b>shall</b>"</p> <p>See Responses to Table 3 in NF Housing Sites submission</p>
Policy H2	Future Growth Areas	<p>Broadly support the strategic approach of Policy H2 in designating specific Future Growth Areas. Concentrating inevitable expansion into managed, masterplanned zones is a far superior alternative to the sporadic 'planning by appeal' that threatens our landscape. Particularly pleased to see that these areas are required to deliver a higher proportion of affordable family homes and coordinated infrastructure. However, support remains contingent on these developments being genuinely landscape-led; the 'Green Infrastructure' and ecological buffers promised in the policy must be treated as essential requirements rather than optional extras, ensuring that Torquay's expansion respects our environmental limits</p> <p>See Responses to Table 4 in NF Housing Sites submission</p>
Policy H3	Other Local Plan allocated sites	<p>H3T.15 Meadfoot Beach car park is in the Lincombes CA. Development of this site will contravene CAA policies and will contradict <b>Strategic Priority 4 Protect Torbay's Natural, Cultural and Built Heritage.</b></p> <p>See also comments on Policy ER7 (Coastal Change Management Areas) and L3 (Coastal landscape and change management), as H3T.15 is within both these areas.</p> <p>These policies prohibit residential development in the ER7 areas and limit to exceptional cases in the L3 areas.</p> <p>See Responses to Table 5 in NF Housing Sites submission</p>



Chapter/Policy	Details	Forum Comments
Policy H4	Minimum density	<p>Need to add “High density will not be supported in rural villages, or where highways and drainage infrastructure is limited”</p> <p>Also inappropriate in some conservation areas – around the harbour for example.</p> <p>Policy is far too vague:</p> <p>Policy uses too much discretionary language (“may”, “agreed”, “robustly justified”).</p> <p>Clear thresholds will help avoid increased car dependency and support sustainable outcomes.</p> <p>Huge difference between 30 and 50 dph – needs better policy definitions</p>
Policy H5	Conversion of buildings into flats	<p>Support Policy H5 and its commitment to ensuring that residential conversions in Torquay provide high-quality, sustainable homes. The insistence that all conversions provide fully self-contained living accommodation is vital for moving away from the substandard "bedsit" models of the past. Mandating that units meet Nationally Described Space Standards and provide adequate natural light and ventilation, is key. Furthermore, the requirements for integrated bin and cycle storage are essential to prevent the "visual clutter" that often degrades our historic streetscapes and Conservation Areas, ensuring that urban densification does not come at the cost of Torquay's unique character .Reference to Policy H10 is needed to conversion to HMOs is managed correctly.</p>
Policy H6	Loss of homes	<p>Protects Torquay’s permanent housing supply. In a coastal town where the pressure for short-term holiday rentals and commercial conversions is high, we must have robust safeguards to prevent the loss of homes for local people. Maintaining the integrity of our residential neighborhoods is essential for social stability and the viability of local services. Particularly value the policy’s strict criteria for exceptions, ensuring that our existing housing stock is only sacrificed when there is a clear and significant benefit to the wider community</p>
Policy H7	Affordable Housing	<ul style="list-style-type: none"> <li>• Need stronger direction for on site. Should this be invoked for &gt;10 rather than &gt;14.</li> <li>• Is there some way of ensuring they can be limited to local residents in need rather than becoming second homes?</li> <li>• Early delivery should be mandatory rather than ‘encouraged’.</li> </ul>



Chapter/Policy	Details	Forum Comments
Policy H8	Affordable housing exceptions sites in the countryside	Must include drainage and flood risk in the adverse impacts
Policy H9	Self-build housing in Future Growth Areas	Need to add that Design should be compatible with the characteristics of the area, and meet drainage requirements
Policy H10	Houses in Multiple Occupation (HMOs)	<p>Strongly endorse the restrictive measures set out regarding Houses in Multiple Occupation (HMOs). Given the historical issues with poor-quality shared housing in Torquay, Fully support the policy's focus on preventing over-concentration and protecting the amenity of existing residential neighborhoods. It is our firm view that the Council should prioritise the creation of fully self-contained flats over shared HMOs to ensure a higher standard of living and greater social stability. By enforcing strict thresholds and demanding high management standards, Policy H10 provides a necessary safeguard against the further degradation of our housing stock and the social fabric of our community.</p> <p>Document states "Applications for new buildings or sub-division of existing buildings into non-self-contained residential accommodation (HMOs) <b>will</b> only be permitted where the following criteria are met...". Change "<b>will</b>" to "<b>shall</b>"</p>
Policy H11	Specialist housing for people in need of care or support	<p>Measure 5 –'easy reach' should be better defined.</p> <p>Support Policy H11 and its focus on providing a diverse range of specialist housing. Given Torbay's aging demographic, it is essential that we move beyond traditional care homes and prioritise 'Extra Care' and adaptable housing that promotes lifelong independence. Particularly endorse the 'right-sizing' approach, which provides attractive options for older residents to downsize while simultaneously freeing up family-sized housing elsewhere. By insisting that specialist housing is built in sustainable, well-connected locations, this policy ensures that our most vulnerable residents remain integrated within the community and have easy access to the services they need</p>



Chapter/Policy	Details	Forum Comments
Policy H12	Proposals involving the loss of care accommodation	Support the protections set out in Policy H12 regarding the preservation and improvement of residential and nursing care accommodation. As Torquay's population ages, we cannot afford to lose high-quality care beds to general residential conversions. Particularly value the policy's insistence that new care facilities must be located in sustainable, integrated areas rather than isolated locations. By ensuring that these homes provide high-quality communal spaces and sensory gardens, the policy places the dignity and wellbeing of residents at the heart of the planning process, ensuring Torquay remains a supportive environment for its most vulnerable citizens.
Policy H13	Sites for travellers	
<b>Chapter 4 Building a prosperous and inclusive Torbay</b>		
Policy ES	Torbay employment and innovation strategy	
Policy E1	Strategic employment land allocation	
Policy E2	Employment area renewal and modernisation	
Policy E3	Supporting a sustainable marine and coastal economy	Living Coasts should be identified to develop something that supports this policy although a lot of people like the idea of an open air theatre as its current layout would support this. The policy itself seems good: its focus on revitalising Torbay's marine and coastal economy. It's vital that we protect dedicated maritime employment land from being lost to general development. By balancing the expansion of marine leisure and tourism with strict environmental protections for our Marine Protected Area, Policy E3 ensures that Torquay can grow its maritime economy without compromising the natural beauty and biodiversity that make the English Riviera unique. However, we are concerned about the suggestion of an extension to Torquay Harbour in view of the protected eel grass beds that are homes to the seahorse population.
Policy E4	Safeguarding strategic employment land	
Policy E5	Education and Local Employment Partnerships	
Policy TOS	Sustainable tourism and cultural investment strategy	



Chapter/Policy	Details	Forum Comments
Policy TO1	Supporting tourism and leisure infrastructure	Support Policy TO1 and the clear designation of Core Tourism Investment Areas. Protecting our prime waterfront and coastal strips from residential encroachment is vital for maintaining Torquay's identity as a premier resort.
Policy TO2	Core Tourism Investment Areas	Support Policy TO2 and its pragmatic approach to the changing tourism market. While it is important to protect our best hotels, we must also address the issue of unviable or derelict guest houses that can blight our residential streets. Particularly endorse the requirement for developers to restore buildings to their original historic form as part of any conversion. This ensures that the loss of a tourism business results in a 'heritage win' for Torquay, replacing cluttered facades with high-quality, sympathetic homes. It is just a pity that the Council is not currently demonstrating this – Bampton for example
Policy TO3	Redevelopment and reuse of holiday accommodation outside Core Tourism Investment Areas	Para. 4.55 supports retaining the site of the former Palace Hotel for a new hotel. HOWEVER Policy Statement TO3 taken at face value supports redevelopment of the site for housing. The Policy Statement itself should make clearer that there will be exceptions to the general policy The following text should be added: <i>"The change of use or redevelopment of holiday accommodation or facilities outside Core Tourism Investment Areas shall not be supported where the accommodation offered a range of facilities not available elsewhere in the area or it would cause loss of access to open areas previously used by the public (e.g. hotel grounds)</i>
Policy TO4	Flexible use of holiday apartments and accommodation	
Policy TO5	New holiday parks and extensions to existing facilities	Need to add impact on flood risk to criterion 2
Policy TO6	Change of use or redevelopment of existing holiday parks to non-tourism uses	
Policy TO7	Tourism investment and monitoring contributions	
Policy TCS	Town centre renewal and retail strategy	



Chapter/Policy	Details	Forum Comments
Policy TC1	Town centre hierarchy	Support Policy TC1 and the Council's 'Town Centre First' approach. Protecting the vitality of Torquay's high street is essential for our local economy and sense of community. Particularly endorse the shift toward a more diverse mix of uses.
Policy TC2	Development in Town Centres	Needs to be strategic focus on Fleet Street as the primary retail hub and heart of Torquay Town Centre that prioritises independent retailers, giving our town a distinct 'point of difference' from generic out-of-town shopping. Support the integration of art and cultural offers into the high street; and a programme of events and activities to support local businesses in the town centre. Furthermore, endorse the plan for environmental enhancements that reflect our unique maritime and waterfront character. By bridging the gap between the Harbour and the high street through high-quality design and cultural activity
Policy TC3	District Centres	There are others albeit smaller – Cheslton, Lucius Street, Babbacombe, Wellswood
Policy TC4	Supporting Local Centres	
Policy TC5	Managing retail outside designated centres	<p>Need verification that proposals are viable. For Maidencombe, the shop there closed in 1995 due to lack of viability. The nearby shop in Stokeinteignhead closed and is now a Community Shop that struggles to survive.</p> <p>While regenerating the main town centre is a priority, the Council must ensure that this does not come at the expense of our neighbourhood hubs, which provide essential services and a unique, independent retail character that many residents prefer. Endorse the protection of these local centres, acknowledging that they offer a vital 'point of difference'—often with more accessible parking and lower overheads for small businesses. There is clearly room for both a vibrant primary heart in Fleet Street, and around the Harbour and a thriving network of local neighbourhood shops; the Plan must ensure that one complements the other, protecting the social fabric and convenience of our local communities.</p>



Chapter/Policy	Details	Forum Comments
Policy TC6	Supporting access to local retail and services	Support the nuanced approach in Policies TC6 - TC10. It is vital that we protect the unique character and free-parking convenience of our out-of-town centres, which provide essential services and a home for independent businesses that might otherwise be priced out of the TC. Furthermore, support the use of Policy TC10 to drive environmental enhancements that bridge the visual gap between our waterfront and the retail heart.
Policy TC7	Change of use away from main town centre uses in Town, District or Local Centres	Particularly endorse Policy TC7's focus on a diverse evening economy; by encouraging art, culture, and varied activities, we can ensure Torquay remains a safe and vibrant destination for all ages.
Policy TC8	Change of use away from main town centre uses outside Town, District or Local Centres	
Policy TC9	Town Centre Regeneration Contributions	
Policy TC10	Safe and welcoming town centres for all	Support the use of Policy TC10 to drive environmental enhancements that bridge the visual gap between our waterfront and the retail heart.
<b>Chapter 5: Thriving communities - Wellbeing, safety and belonging</b>		
Policy SCS	Sustainable and inclusive communities strategy	Strongly advocate for a more explicit link between <b>art, culture, and public health</b> within the SC and TC policies. Engagement with the arts is not merely a leisure activity; it is a vital contributor to the health and wellbeing of our community, offering proven benefits in reducing social isolation and supporting mental health through 'social prescribing.' I believe that by embedding <b>cultural hubs and creative spaces</b> within the heart of Torquay, we can create a town centre that functions as a 'wellbeing destination.' This approach, where environmental enhancements reflect our maritime heritage and cultural activities provide a year-round draw, will not only support our independent businesses but also foster a healthier, more resilient, and more connected population
Policy SC1	Public health and wellbeing	
Policy SC2	Sport, leisure and recreation for healthy living	



Chapter/Policy	Details	Forum Comments
Policy SC3	Education infrastructure and inclusive learning strategy	
Policy SC4	Sustainable food production and land protection	
Policy SC5	Community facilities, infrastructure provision and developer contributions	
Policy SC6	Cemetery and memorial provision strategy	
<b>Chapter 6: Moving Torbay - Sustainable travel and inclusive access</b>		
Policy TAS	Integrated transport vision, transport hierarchy and strategic connectivity	<p>‘expected to be achieved’ – is speculative. Needs to be ‘will be delivered by’</p> <p>‘connected to the existing transport network across all layers of the transport hierarchy’ – we would argue there is currently no cycle transport network. There are no acceptable cycle links between any of the three towns that are safe and accessible to all. This is fundamental and the plan must seek to address these shortcomings. There is no point in development connecting to an unsafe network as this will not enable cycling.</p> <p>Proposals set out within the Devon and Torbay Local Transport Plan will be supported subject to other Local Plan Policies. – very weak statement for what is the adopted, strategic local transport plan.</p> <p>Explanation 6.9 is strong but needs embedding in policy.</p> <p>No mention of health and wellbeing elements of active travel – creation of healthy neighborhoods, public health benefits, local shops etc...</p> <p>6.10 – there are way more benefits to improving local public transport – equity, justice, de-carbonisation of transport – given low levels of car ownership and forced car ownership in our areas of deprivation this is a key driver of economic success, town centre regeneration and growth delivery</p> <p>6.18 – seize opportunities for highway improvements to improve safety and accessibility for all users in line with the transport hierarchy</p>



Chapter/Policy	Details	Forum Comments
Policy TA1	Reducing the impact of transport and promoting sustainable travel	<p>‘To assess and mitigate the impact of development and to promote sustainable travel choices, the following information will be required to support planning applications’.</p> <p>This is not ‘information’ – developers must take a vision-led approach to sustainable transport planning in line with the transport hierarchy and aims to enable sustainable transport options. Plans must be monitored and enforceable through planning obligations.</p> <p>Needs modal targets which are realistic and enforceable</p> <p>6.22 ‘can’ – needs to be removed</p> <p>6.23 Is very negative – sustainable transport provision is a key factor for economic growth, should promoted as such and presented positively.</p>
Policy TA2	Effective and inclusive transport system	<p>Very weak – ‘Where developments generate new or additional journeys, it <b>may be</b> necessary to seek financial contributions towards enhanced transport infrastructure or service provision.’</p> <p>Policy should embed vision-led transport planning.</p> <p>All developments affect transport so statement ‘especially if...’ is not necessary. We should not be trying to ‘mitigate effects’ we must be envisaging a transport environment and development should positively contribute to this through financial or actual infrastructure improvements.</p> <p>Improvements must be secured and delivered prior to occupation in order to effectively promote positive behaviour change.</p>
Policy TA3	Development layout, access and connectivity standards	<p>Policy needs to talk about permeability in line with transport hierarchy – development should always contribute to active travel links wherever possible to support active travel.</p> <p>Connection needs to be beyond the ‘red line’ where lack of ongoing access exists this needs to be provided.</p> <p>‘Unfettered access’ – should be balanced by the provision of health/livable neighborhoods, designed for people and appropriate to the setting.</p> <p>2.27 – should include maintenance like 2.28 does?</p>



Chapter/Policy	Details	Forum Comments
Policy TA4	Parking and shared transport provision	<p>Policy – loss of car parking in town centers should be acceptable as part of a vision led transport statement and realistic plan in order to maximize use of town center brownfield sites and to reduce car dependency.</p> <p>Table 13 should be a separate table for ‘Maximum Parking Standards’ in ‘Town Centre and Accessible Locations’ – the e.g should be statement. The active travel management section should not be an add on – all development should be supported by vision-led transport planning’ and this must be realistic, monitored and enforced as planning conditions.</p> <p>Unsure whether a shared cycle or car club spaces are currently a useful provision? Is it something likely to be in operation in Torbay anytime soon?</p> <p>Electric Vehicle Charging provision – a % of provision should be accessible EV charging</p> <p>Cycle Parking needs minimum size standards and guidance that vertical storage is not acceptable and provision for storage of non-standard cycles.</p> <p>6.32 – should mention the onus on developers to fund or part fund creation of controlled parking zones if required to manage local demand.</p> <p>6.33 – car parks should be ‘accessible and safe’ – add ‘to all users’ – too often pedestrian access is secondary in these designs and given that 2 people died in Torquay in 2025 within car parks this issue is extremely pertinent.</p> <p>Parking is fundamental and should not be left to an as yet unpublished SPD.</p>
<b>Chapter 7: Building for the future - Resilient and smart infrastructure and developer contributions</b>		
Policy INS	Sustainable infrastructure	The Green Infrastructure Management Plan is dated 2011 and is grossly out of date, so irrelevant. Where is its replacement?
Policy IN1	Prioritisation of planning obligations	Need to reduce exemptions from CIL such that more CIL Funds become available.
Policy IN2	High quality communications and digital connectivity	
<b>Chapter 8: Climate Change - Our sustainable and resilient future</b>		



Chapter/Policy	Details	Forum Comments
Policy CERS	Climate resilient, net zero carbon developments	Document states “...all development proposals will be required to be designed to be resilient to climate change and minimise carbon dioxide and wider greenhouse gas emissions”. The document also talks about MAXIMISING renewable energy generation. To achieve net zero carbon emissions during building use (i.e. energy for building heating and cooling etc.), the “Passivhaus” construction standard should be specified for all new builds.
Policy CER1	Net zero carbon development standards	
Policy CER2	Embodied carbon reduction and assessment	Policy is welcome but needs to not be just 1:1 as this could be a get out for developers. They could demolish one building and build 2. Should be a factor in all development, not just major.
Policy CER3	Heritage assets and climate adaptation	
Policy CER4	Renewable and low carbon energy generation	
Policy ER1	Flood Risk and Safe Development	
Policy ER2	Drainage Hierarchy	
Policy ER3	Water Management	
Policy ER4	Sustainable Drainage Systems and Water Sensitive Urban Design	Must state where SuDS cannot be used: gradients and potential discharge onto highways, or where there is land instability.
Policy ER5	Contaminated Land and Site Remediation	
Policy ER6	Ground stability and risk management	
Policy ER7	Coastal Change Management Areas	Document states “Permanent new residential development (including through change of use) will not be permitted within a Coastal Change Management Area (CCMA).” Several housing sites are partially or fully within the CCMA so contravene this policy e.g. H1T.5; H3T.15; H3T.22; H3T.10; H3T.7 Change “will” to “shall”
<b>Chapter 9: Our Natural Places - Protecting and enhancing Torbay's countryside, landscape and natural environment</b>		



Chapter/Policy	Details	Forum Comments
Policy LS	Landscape Strategy	Strongly support the comprehensive protections in Chapter 9, particularly <b>Policy L5 (ULPAs)</b> and <b>Policy L6 (Local Green Spaces)</b> . These 'green lungs' are essential for the mental health of our residents and provide a vital 'point of difference' for Torquay's urban character. Endorse the plan's focus on <b>Policy GE1</b> and our <b>UNESCO Global Geopark</b> status, which correctly identifies our geological heritage as a key economic and cultural asset. Crucially, we support the 'nature-positive' approach of <b>Policy NC3 (Biodiversity Net Gain)</b> and <b>Policy NC4 (Light Pollution)</b> ; we must protect not just the spaces themselves, but the delicate wildlife within them Our natural environment is our greatest infrastructure asset.
Policy L1	Protecting our countryside and rural economy	Village Envelopes needed for Cockington and Edginswell as well as Maidencombe. Note that they shall be defined in the Neighbourhood Plans as previously
Policy L2	National Landscape	
Policy L3	Coastal landscape and change management	Document states <i>"The council ... will conserve the character of the undeveloped coast and seek to enhance its distinctive landscape, seascape, biodiversity, geological, recreational and cultural value. Development will not be supported in the undeveloped coastal area unless proposals satisfy the following requirements:</i> <ol style="list-style-type: none"> <li>1. Maintain the unspoilt character of the coastline, coastal landscape and seascape;</li> <li>2. Maintain or improve public access for recreation; and</li> <li>3. Provide sensitively designed development, including tourism uses, where there are clear economic or sustainability benefits that cannot be realised in alternative locations."            Several housing sites are partially or fully within the L3 areas so contravene this policy statement e.g. H3T.15; H3T.22; H3T.10; H3T.7; H3T.2            Change "<b>will</b>" to "<b>shall</b>"</li></ol>
Policy L4	Valued landscapes	
Policy L5	Urban Landscape Protection Areas (ULPAs)	Needs to be made stronger. Change " <b>will</b> " to " <b>shall</b> " and re-phrase: <i>"Development within Urban Landscape Protection Areas (ULPAs), as shown on the Policies Map, SHALL NOT be supported unless:"</i>
Policy L6	Local Green Spaces	Where are these defined? Should be in Neighbourhood Plans and should be listed. Change " <b>will</b> " to " <b>shall</b> "
Policy THS	Trees and hedgerows	



Chapter/Policy	Details	Forum Comments
Policy TH1	Trees, hedgerows and natural landscape features	
Policy TH2	Mitigation for loss of trees, hedgerows and woodland	
Policy NCS1	Biodiversity and Nature Recovery Network	Need to include green corridors for insect life
Policy NCS2	Habitats Regulations Assessment	
Policy NC1	Biodiversity and ecology	
Policy NC2	Species of principal importance	
Policy NC3	Biodiversity Net Gain	Need to minimize excuses for off-site provision – could stipulate more?
Policy NC4	Light pollution	
Policy GE1	Geodiversity and English Riviera UNESCO Global Geopark	
Policy GIS	Green and blue infrastructure	
<b>Chapter 10: Our Shared History - Protecting and enhancing Torbay's heritage and identity</b>		
Policy HES	Historic environment strategy	Suggest add “Illuminated advertising signs will be supported only where there is minimal impact on the surrounding vista,” Change “ <b>will</b> ” to “ <b>shall</b> ”
Policy HE1	Designated Heritage Assets	Suggest add “‘Harm’ includes physical effects such as increased flood risk or land instability” Change “ <b>will</b> ” to “ <b>shall</b> ”



Chapter/Policy	Details	Forum Comments
Policy HE2	Conservation Area protection and enhancement	<p>Suggest add “Development within the Conservation Areas of rural villages will not be supported.”</p> <p>Development in Conservation Areas should follow good design guidelines and mirroring established architecture in that area. ie: pitched roofs in an area where they are pre-dominant. Flat roofs which are unattractive and unsustainable (need frequent repair) shall be discouraged. Building height must be compatible with surrounding buildings.</p> <p>New Policy is welcomed but should be strengthened by changing “<b>will</b>” to “<b>shall</b>”</p> <p>Having observed the debacle over the Maycliffe Hotel, while we support the objectives of Chapter 10, we strongly urge the Council to be more proactive and consistent in its use of existing powers. Specifically, we advocate for the wider implementation of <b>Article 4 Directions</b> across all of Torquay’s Conservation Areas to prevent the incremental loss of historic windows, doors, and boundary features that define our town's character. There is a clear community perception that the Council has, in the past, failed to consistently enforce heritage standards, leading to a visible 'erosion of character.' The new Local Plan must be backed by a commitment to <b>rigorous and consistent enforcement</b>; whether a development is a minor alteration or a major regeneration project, the standard for protecting our Victorian and maritime identity must be applied equally. Our heritage assets are irreplaceable, and the Council must use every tool at its disposal—including Article 4—to ensure they are not further diminished by unsympathetic or unauthorized works</p>
Policy HE3	Non-designated heritage assets	New Policy is welcomed but should be strengthened by changing “ <b>will</b> ” to “ <b>shall</b> ”
Policy HE4	Schedules of redevelopment of heritage assets	New Policy is welcomed but should be strengthened by changing “ <b>will</b> ” to “ <b>shall</b> ”
Policy HE5	Investigation and preservation of archaeology and historic artefacts	New Policy is welcomed but should be strengthened by changing “ <b>will</b> ” to “ <b>shall</b> ”
<b>Chapter 11: Designed with quality - Taking pride in Torbay's place-making</b>		



Chapter/Policy	Details	Forum Comments
Policy DE5	Design and placemaking	Strongly support the high standards for design and place-making particularly Policy DES and DE1. For these policies to be effective, they must be applied with consistency. We urge the Council to use the design standards here as a mandate to implement Article 4 Directions across our Conservation Areas, ensuring that 'minor' alterations do not continue to erode Torquay's historic character. New developments, especially in the TC and along the Waterfront, must respect the prevailing building heights (DE4) and use materials that reflect our maritime and Victorian identity. No more 'generic' architecture; every new building should enhance not detract from. Also should Reference Design Guides and SPDs
Policy DE1	Design quality and assessment	
Policy DE2	Building for a Healthy Life	Could this be strengthened? To 'only supported if it secures 'green lights' unless there are specific site and scheme constraints?
Policy DE3	Development amenity and living standards	Should electric vehicle charging points be added to #2? – Accessible EV charging
Policy DE4	Building heights and urban form	Amend line 1: "The height <b>style, and roof form</b> of new buildings. . . "
Policy DE5	Extensions and standalone additions to buildings	
Policy DE6	Advertisements	
<b>Chapter 12: Responsible resource use - Waste and Minerals</b>		
Policy WS	Waste spatial strategy	
Policy W1	Waste hierarchy and sustainable waste management	
Policy W2	Waste reduction and waste audit for major and significant waste generating developments	
Policy W3	Safeguarding waste management facilities	
Policy W4	Proposals for new waste management facilities	
Policy W5	Waste water disposal and infrastructure capacity	
Policy MS	Sustainable minerals strategy	
Policy M1	Minerals extraction and environmental safeguards	



<b>Chapter/Policy</b>	<b>Details</b>	<b>Forum Comments</b>
Policy M2	Maximising the Use of secondary and recycled aggregates	
Policy M3	Preserving and safeguarding of limestone resources and key local building stone	



## Torbay Local Plan 2025-2045 Reg 18 Consultation

### Torquay Neighbourhood Forum Response to Housing Sites

**General comment:** Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

Currently, no sustainable transport infrastructure is planned to support many development sites and so that must be caveated in the local plan. – This could be rectified by developing an Infrastructure Delivery Plan

Site Ref	Details	Number	Forum Response	
			Number	Comments
H1T.1	Castle Circus Area	50		
H1T.2	Union Street, Union Square, Lower Union Lane	200		
H1T.3	Temperance Street, and Market Street, Pimlico	150		
H1t.4	Abbey Road, Rock Road, Roebuck House	100		
H1T.5	Fleet Street, Torquay Harbour: Living Coasts, Strand, and Marina Car Park	100	<100	51 Consented P/2021/0120 at Imperial Hotel. Development on Marina Car Park not supported owing to proximity to Pavilion.
	<b>TOTAL Town Centre</b>	<b>600</b>		
H2T.1	Torquay Gateway, Edginswell, Torquay	350		See general comment
	<b>TOTAL Future Growth Areas</b>	<b>350</b>		
H3T.1	Maidencombe North of Sladnor park and around Jon Glanvill Autos	150	0	Not Sustainable Development Flood risk and no mains drainage Unsafe walking/cycling Landowners unwilling to sell/develop
H3T.2	Sladnor Park, Maidencombe	120	36	Not Sustainable Development Flood risk and no mains drainage Unsafe walking/cycling Reduced number on existing footprints acceptable
H3T.3	Brunel Manor, conversion of buildings and additional site to the north	45	45	Acceptable
H3T.4	Great Hill	130		Not Sustainable Development. Potential flood risk to Rocombe & Stokeinteignhead. Lack of infrastructure to support this number
H3T.5	Land at Kingskerswell Road and r/o Barton Hill Road	10		



Site Ref	Details	Number	Forum Response	
			Number	Comments
H3T.6	Holiday Parks, North of The Willows	250		
H3T.7	Land adjacent and south of Watcombe Hall	10	10	
H3T.8	Babbacombe Business Park, Babbacombe Rd, Torquay	12	10	
H3T.9	Land North of Bottompark Lane, Barton Hill Road.	20		
H3T.10	Former Tennis Courts, Palace Hotel	38	10	38 Consented P/2019/0716
H3T.11	Grand Hotel Garage Block	10	0	Eliminates parking and will add to road congestion. The entrance and exit to the garage are opposite the Hennapyn Road railway bridge and on a sharp bend. The road directly in front of the garage entrance can be obstructed by delivery vehicles and coaches unloading or loading hotel guests who have nowhere else to park due to cars parked along the road. This makes it an extremely dangerous route to navigate as it is a direct route when the seafront is closed.
H3T.12	Land adjacent to Broadley Drive, Livermead, Torquay	50	50	This currently farm land but is a natural infill with access immediately at the top of Broad Park Road.
H3T.13	Grounds of Rowcroft, Avenue Road	40		
H3T.14	Maycliffe Hotel, St Lukes Road South	10		
H3T.15	Meadfoot Beach Car Park	10	0	H3T.15 Meadfoot Beach car park is in the Lincombes CA. Major adverse visual impact as inline of sight of nearby Listed buildings on Hesketh Crescent. Development of this site will contravene CAA policies and will contradict <b>Strategic Priority 4 Protect Torbay's Natural, Cultural and Built Heritage</b> Also loss of trees and parking spaces, which are needed to support the beach in high season. See also comments on Policy ER7 (Coastal Change Management Areas) and L3 (Coastal landscape and



Site Ref	Details	Number	Forum Response	
			Number	Comments
				change management), as H3T.15 is within both these areas. These policies prohibit residential development in the ER7 areas and limit to exceptional cases in the L3 areas. Also, in view of the current storms and impact on Meadfoot Car park, this should be removed as a housing site
H3T.16	Site 1 Higher Cadewell Lane	18		
H3T.17	Site 2 Higher Cadewell Lane	12		
H3T.18	Hatchcombe Lane, Scotts Bridge/Barton	50		
H3T.19	Westhill Garage, Chatto Road	15	15	
H3T.20	Seabury Hotel, 11 Manor Road, Torquay	12	14	14 Consented P/2023/0721
H3T.21	Quintaville, Junction of Reddenhill Road	10	14	14 Consented P/2023/0327
H3T.22	Stoodley Knowle, Ansteys Cove Road, Torquay	80	90	90 Consented P/2024/0693
H3T.23	R/O Edinburgh Villas, McKay Avenue, Torre Marine (Specialist housing)	75		
H3T.24	Shelley Court Hotel, 29 Croft Road, Torquay	20		
H3T.25	Brampton Court Hotel, St Lukes, Road South	14		
H3T.26	Conway Court, Warren Road	14		
H3T.27	Shedden Hall Hotel Site, Shedden Hill	30		
H3T.28	Bancourt Hotel, Avenue Road	30		
H3T.29	Hollicombe (former gas works)	50	>185	This is a brown field site. Planning approval was granted 11th October 2012 for 185 residential dwellings. There could be space for more especially if apartment blocks are built
H3T.30	Coppice Hotel	20	20	Acceptable. Building is currently an eyesore with ASB
H3T.31	Hotel Virginia, Falkland Road	15		
H3T.32	Chelston Telephone Exchange Goshen Road	20	20	Brownfield site,suipported
H3T.33	Menzies House Parkfield Road	10		



Site Ref	Details	Number	Forum Response	
			Number	Comments
	<b>TOTAL other allocated sites</b>	<b>1395</b>		