

Torbay Local Plan 2025-2045 Update A Landscape to thrive – Regulation 19 Consultation

South Hams District Council Response

Closing date for comments: Thursday 24 September 2026

Introduction

South Hams District Council welcome the opportunity to comment on the Torbay Local Plan (2025-2045) Regulation 19 Consultation. Comments were made at the earlier consultation stages including the Regulation 18 consultation in January 2026. We are encouraged to see that many of our points made in our previous submissions have been addressed and it is anticipated that some outstanding points will be covered in the Statement of Common Ground prepared between the two authorities later in the Autumn.

The Council wish to offer the following comments:

1. Strategic Matter: Torbay's unmet housing need

Representation type: Comment

Comment: The Regulation 19 consultation specifically records concerns from neighbouring authorities and statutory consultees regarding Torbay's housing target and cross-boundary implications. Torbay are planning for approximately 8,000 dwellings (400 dwellings per annum) rather than meeting the full standard method need. South Hams has consistently raised this as an issue as it unlikely to be able to accommodate any unmet need from Torbay. The consultation notes support for the strategic direction to be provided through a future Devon-wide Strategic Development Strategy but identifies continuing soundness concerns regarding housing provision and cross-boundary strategy. There is still a risk at examination that inspectors will question how unmet housing need is to be addressed and whether reliance on wider Devon arrangements is sufficiently evidenced.

The Council sympathise with Torbay's difficult challenge of balancing levels of development with the protection of Torbay's unique character and sensitive landscapes, including the South Devon National Landscape and supports it's aims to focus on previously developed land first with the redevelopment of existing sites and buildings, including the conversion of some hotels to homes.

Proposed modification: No modifications sought to the Plan. Suggest that this issue on how unmet housing need is to be addressed should be covered in the Statement of Common Ground.

2. A385 Corridor Transport Impacts (Collaton St Mary / Totnes Road)

Representation type: Comment

Comment: One of the strategic growth areas is proposed in the Collaton St. Mary/Totnes Road (A385) corridor where the development of housing sites is already underway. Development at this location will inevitably add vehicles to the main A385 through Totnes and this needs to be properly modelled and considered in terms of transport and alternative modes of transport to the private car should be a requirement of any development scheme. The Council has previously raised concerns that infrastructure impacts of the proposed sites are properly master planned and to ensure that sustainable travel methods are put in place. Some of the strategic growth areas, specifically the area proposed in the Collaton St. Mary/Totnes Road, is distant from existing services and facilities and could be heavily reliant on private car use. All sites proposed in south Torbay will also add pressure on the A385 corridor as it's one of only two main highway links into Torbay. We support the Vision-led approach to minimising the transport impacts of new development through journey reduction and modal shift.

Proposed modification: Request that policy is strengthened to ensure delivery of the vision.

3. South Hams SAC/Greater Horseshoe Bats

Representation type: Support

Comment: The Regulation 19 plan continues to contain strong habitat protections and recognition of internationally important ecological interests. The wider evidence base and environmental chapter continue to support mitigation approaches for protected sites.

The plan states that any development should also have regard to the in-combination effects of multiple developments that could affect Greater Horseshoe Bats, calcareous grassland features and the integrity of the South Hams SAC. To mitigate the impact of increased recreational pressure on the South Hams SAC an 8km zone is identified and any development that comes forward within this area would be required to make a financial contribution to the South Hams SAC. This 8km zone extends into part of the South Hams administrative area. We support this approach to help mitigate the detrimental recreational impact and welcome an improved management plan for Berry Head.

Proposed modification: None requested.

4. H2P.1 Collaton St Mary/Totnes Road

Representation type: Comment

Comment: Development in the Totnes Road corridor remains a key growth location in the Regulation 19 plan. Whilst the Council recognises that there is potential for further development in this area, it has previously raised concern that the sites proposed will lead to a linear form of development along the A385 without easy access to local services and facilities. Sustainable transport links will be necessary at this development to provide an alternative option to private car use which is likely to be the dominant mode of transport. As highlighted above, we are concerned that development at this location will increase traffic flows through Totnes and could affect the air quality – which is something that will need to be monitored. The

topography of the area is quite complex; however, this means that parts of the growth area is less visually sensitive within the wider landscape. The area also has landscape features which should be retained to help incorporate the development in the wider setting.

The allocation appears to remain unaltered from the Regulation 18 consultation and has not been reduced or reshaped in response to concerns over linear growth, A385 impacts and access to facilities and services. However, the council appreciate that the availability of potential development sites is also an important factor when considering growth options and may mean that the patterns of development are not ideal.

Proposed modification: Request that policy is strengthened to help ensure modal shift and emphasise the importance of design quality in the future growth area.

5. H2P.2 Long Road/ Yalberton/inglewood

Representation type: Comment

Comment: The Council considers that there is potential for further growth in this area providing a mixed-use extension to the existing development which includes residential and employment uses. The proposals for new employment land are welcomed, recognising the benefits in providing more job opportunities in the Bay, potentially helping to reduce travel out of the area for work.

However, the council has previously raised concern that any extension would result in development in the countryside and therefore, requires sensitive master planning. Whilst higher density development may be achievable immediately adjacent to the existing built form, to balance landscape integration with urban growth, built edges should be planned around compact, medium to high density clusters embedded within generous, connected countryside corridors. This cluster approach would help buffer visual impact and preserve biodiversity in the short term, whilst ensuring that each cluster of development remains walkable, viable to public transport and easy to integrate into a cohesive urban structure if the area expands in the future.

It also noted that a further extension is proposed at the Inglewood development. Whilst the site proposed for the extension is not so prominent as the main site and is less open to distant views, development of this site will fill the existing rural gap and result in continuous ribbon development along the Brixham Road (A3022) creating a hard edge to the built form, as opposed to being interspersed with pockets of open countryside which would be preferable and easier to assimilate in the wider countryside.

Proposed modification: Request that design quality, landscape-led development and place-making are a requirement at any future master planning of this growth area. Encouraging compact, walkable development with strong public transport links rather than car dependent urban sprawl into the countryside.

6. Stoke Road (H2P.3 in Reg 18 draft plan)

Representation type: Support

Comment: The Council supports the removal of the housing allocation in the Regulation 19 plan.

Proposed modification: None requested.

7. Monksbridge, Brixham (H3BCG.3 in Reg 18 draft plan)

Representation type: Support

Comment: Support the removal of this housing allocation in the Regulation 19 plan at this highly sensitive landscape location.

Proposed modification: None requested.

8. H3BCG.2 Archery Field, Churston

Representation type: Comment

Comment: The council remains concerned about the proposed allocation at Archery Field for approximately 50 dwellings. Whilst the site lies outside the National Landscape designation, it is located within open countryside and forms part of the wider landscape setting experienced from surrounding areas. Development of this site would result in a detrimental impact on the rural and open character of this area.

The Council also questions the suitability of the location. Although the site is located at the edge of Galmpton and is situated close to the Railway Inn, it does not provide convenient access to a range of day-to-day services and community facilities. Whilst geographically close to Galmpton village, the site is physically separated from the village by the South Devon Steam Railway line, reducing the degree to which residents could readily access local facilities on foot. Inevitably, future residents are likely to be heavily reliant on private vehicle use for many everyday journeys.

Increased car dependency arising from the development has the potential to add further traffic to the A379/A3022 corridor and exacerbate existing congestion issues at Windy Corner, which is already recognised as operating under significant pressure.

The council acknowledges the challenges associated with meeting the Bay's housing requirement, particularly within the southern part of Torbay where environmental and landscape constraints limit development opportunities. It is recognised that Archery Field may represent one of the most deliverable options available to the local planning authority. Nevertheless, the allocation appears to sit in tension with the wider spatial strategy of the Local Plan, which seeks to prioritise regeneration and growth within the built-up area in order to minimise impacts on the natural environment.

Proposed modification: The Regulation 19 Plan should provide clear evidence demonstrating why development of the countryside site is necessary and how the allocation is justified when assessed against the Plan's overarching objectives.