



**National
Trust**

24th September 2026

Strategy and Project Management
Spatial Planning
Tor Hill House
2nd Floor North
Castle Circus
Torquay
TQ1 3DR

[By email: future.planning@torbay.gov.uk]

Dear Sir/Madam,

Re: Torbay Local Plan Update– Publication Version and Consultation (Regulation 19).

The National Trust welcomes the opportunity to comment on the Publication Version of the Local Plan. This response follows the National Trust's representations on the previous Regulation 18 Options Consultation, the Local Plan Housing Update Growth Options consultation in 2022, and the Regulation 18 Consultation Draft in 2026.

The National Trust notes that the Plan contains a strong presumption in favour of urban regeneration and support for affordable housing and seeks to achieve an average delivery of 400 dwellings per year over the plan period 2025-2045, which is consistent with previous consultations.

Whilst the National Trust acknowledges the factors constraining the delivery of a higher number of homes within the Torbay plan area, and recognises that environmental and infrastructure constraints can justify a lower housing requirement, we have previously expressed concern that the resulting level of unmet housing need could leave Torbay more vulnerable to speculative development proposals, including on unallocated sites and, in particular, greenfield locations.

The National Trust has reviewed the updated Topic Paper and welcomes the additional work undertaken by the Council to justify the proposed housing requirement. The Trust acknowledges that a robust evidence base has been prepared regarding the environmental and infrastructure constraints affecting Torbay. The supporting evidence strengthens the justification for departing from the standard method housing requirement compared to the

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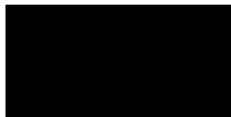
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position at the Regulation 18 stage. Nevertheless, the proposed level of housing provision represents only a proportion of identified housing need and results in a significant level of unmet need arising over the plan period.

The National Trust acknowledges that the Council has engaged with neighbouring authorities and other relevant bodies regarding this matter. However, at present, there appears to be limited certainty that neighbouring authorities will accommodate a quantified proportion of Torbay's unmet housing need through their own plan-making processes.

It is noted that the proposed Spatial Development Strategy (SDS) may provide a mechanism through which unmet housing needs can be addressed. However, in the absence of an adopted SDS, or clear evidence of progress towards securing a strategic solution, the National Trust remains concerned that the Plan may not fully satisfy the tests of soundness relating to being positively prepared and effective. The National Trust recognises the challenges of doing so in the context of Local Government Reorganisation, however considers that greater certainty regarding how unmet housing need should be provided prior to Examination.

Yours sincerely



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Cont/d