

Future Planning

From: Lewis Knight [REDACTED]
Sent: 19 December 2025 13:50
To: Future Planning
Cc: [REDACTED]
Subject: TORBAY LOCAL PLAN 2025-2045 Regulation 18 Consultation - Taylor Wimpey Reps
Attachments: TW Rep - Torbay LP Consultaion - Reg 18 - Dec 25.pdf

Follow Up Flag: Flag for follow up
Flag Status: Completed

To whom it may concern,

Please find attached Taylor Wimpey Exeter's comments on the Torbay Local Plan 2025-2045 Regulation 18 Consultation.

If you have any queries then please let us know.

All the best,
Lewis

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Customer Satisfaction 2025

**MAKE A HOME AT
TAYLOR WIMPEY**



**Taylor
Wimpey**

[REDACTED]

[REDACTED]

[REDACTED]

15th December 2025

Spatial Planning
Torbay Council
Floor 2 Tor Hill House
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Torquay
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To whom it may concern,

RE: TORBAY LOCAL PLAN 2025-2045 Regulation 18 Consultation

This letter is written on behalf of Taylor Wimpey (Exeter) Ltd in response to the above consultation which outlines the Council's proposed approach as part of the emerging Torbay Local Plan 2025-2045. Taylor Wimpey is a national house builder and has extensive site delivery experience in the South West. Taylor Wimpey also have a land interest at Collaton St Mary, which has the benefit of two outline planning permissions, one granted at appeal, and one granted by Torbay Council. Taylor Wimpey are currently selling homes on this allocated site and have been continuously engaged with Torbay Council over several years to achieve this. Comments to the Regulation 18 Local Plan are therefore made in this context but also the desire to deliver sustainable development in the District in the future.

Executive Summary

Key requests for change and/or scrutiny to proposed policies:

- Energy & carbon – align any net-zero/renewables measures with national Future Homes Standard trajectories: adopt performance-based outcomes and viability flexibility rather than prescriptive technology ratios.
- Drainage/SuDS – replace any blanket brownfield “betterment” percentage with no-net-increase peak runoff or evidence-led betterment where feasible, and allow below-ground SuDS where space is constrained.
- Biodiversity – keep BNG at 10% minimum (national baseline) and avoid stacked on-site ecological features that compromise design/density; support site-level aggregation and canopy-equivalent tree replacement with off-site options.
- Mixed-use land take – moderate any fixed employment land percentages within large housing schemes; use masterplan-led viability testing instead of rigid area quotas (see SA references to SS1 and strategic growth areas).
- Affordable housing – include clear viability review provisions (retain review mechanisms proportionately), avoiding cliff-edge steps that deter medium-sized sites.

- Planning obligations – provide a transparent infrastructure cost list and avoid open-ended “administration” charges; keep deferred review triggers objective and bounded.

Housing Numbers, Strategic Growth and Regeneration

Based on the Autumn 2025 dataset for the standard method, Torbay’s annual housing need is approximately:

950 dwellings per annum (dpa)

This reflects:

- Torbay’s housing stock baseline.
- Affordability ratio adjustments (Torbay has relatively high affordability pressures compared to earnings).
- The national push to meet 300,000 homes per year across England.

The draft Torbay Local Plan 2025-2045 (Reg 18 version) proposes 400 dpa. This is a significant shortfall from the required figure derived from the standard methodology and would require exceptional mitigation reasons, which have not been set out in the consultation material.

To add to the concern about the new Local Plan delivering the housing required for residents, the recent housing delivery history in the district has been very low. This is set out in a table below, comparing it to the Local Housing Need figure, derived from the standard methodology and the draft Local Plan target.

Metric	Dwellings per annum
Local Housing Need (LHN)	950
Local Plan Target	400
Recent Delivery Rate (3-year average)	341

The latest Housing Delivery Test data¹, shows Torbay delivered 66% of the number of homes required over the latest timeframe that can be assessed. The recent Delivery Rate (3-year average) used in the table above was taken from the same Housing Delivery Rate dataset.

Evidentially, there has been a fundamental issue with delivering housing through the Local Plan in the district in recent years. The new Local Plan must reverse this trend and implement a strategy to deliver homes and contribute to the Government’s stated aim of delivering 300,000 homes per annum nationally. Unfortunately, this draft Local Plan

¹ [Housing Delivery Test 2023 measurement.ods](https://www.torbay.gov.uk/media/1000000/housing-delivery-test-2023-measurement.ods)

does not even aim to deliver half the homes that are set out in the standard methodology. As such, at a structural level this draft Local Plan could not be found to be sound.

The prioritisation of brownfield regeneration is laudable but it is clear that other land uses will need to be utilised to achieve the Local Housing Need. The Plan should provide clear evidence of the deliverability and viability of brownfield and regeneration sites, including realistic trajectories and contingency measures if sites do not come forward as expected.

The delivery of high quality and sustainable employment space - 80,000m² - is welcome. A robust Local Plan must comprehensively plan housing, economic and infrastructure objectives concurrently.

Notwithstanding, fixed employment land percentages within large housing schemes should be moderated. The Local Plan should adopt masterplan-led viability testing rather than rigid area quotas, ensuring that mixed-use developments remain viable and responsive to market conditions.

While environmental protection is important, the plan should ensure that constraints are not applied more widely than necessary, and that all reasonable opportunities for sustainable growth are explored. The Plan should consider more comprehensively whether some constraints can be mitigated through design, infrastructure investment, or off-site solutions.

Infrastructure

Delivering ‘integral infrastructure’ to any proposed development to make it acceptable is a standard approach, and this should be properly outlined in any allocation and/or through pre-application discussions at application stage. These works need to be directly linked to the impact of the proposed development as per national planning guidance².

Draft Policy IN1 (Prioritisation of planning obligations) of the emerging Local Plan sets out a cascade of priorities for planning obligations. Planning obligations like affordable housing are expected and can help deliver sustainable development objectives. Notwithstanding, additional planning obligations can add unacceptable costs to developments and impact a scheme’s viability. An independent assessment of viability, as set out in the policy, can be used when viability is a concern and options to remove planning obligations are then explored. This can add time and cost to a project and the determination of a planning application and should not be a common process. There is

² These tests are set out as statutory tests in [regulation 122](#) (as amended by the 2011 and 2019 Regulations) and as policy tests in the National Planning Policy Framework.

concerns that the level of planning obligations is becoming too onerous on new development. As such, it is requested that all potential planning obligations are independently assessed for impact on viability. Reference to types of planning obligations that place excessive financial demands on new development should not be included or pursued through planning application discussions.

For drainage and SuDS, it is proposed that the Local Plan replaces any blanket brownfield 'betterment' percentage with a policy of no-net-increase in peak runoff, or evidence-led betterment where feasible. Additionally, below-ground SuDS should be permitted where space constraints exist, ensuring practical and effective water management solutions.

Planning obligations should be transparent, with a clear infrastructure cost list and avoidance of open-ended administration charges. For example the 5% administration fee for developer contributions is an arbitrary and unreasonable amount to ask for. Deferred review triggers must remain objective and bounded to ensure fairness and predictability for developers.

Affordable Housing and Diversity

The delivery of affordable homes for the residents of Torbay is a crucial objective for the draft Local Plan. There is a clear 'direction of travel' for larger and allocated sites to deliver higher proportions of affordable housing. This is set out in a 'stepped threshold up to 30%'.

As evidenced in recent years, Registered Providers have taken less s106 affordable units and increasingly look to secure 'additionality' units in large developments. This is a particular concern for areas in the South-West of England.

Taylor Wimpey would strongly urge that the Local Plan provides the flexibility to deliver affordable homes in way which reflects the current conditions at the time. Typically, this would relate to s106 legal agreements including provisions that are flexible and allow approaches to affordable homes to update to available provision. It would be useful to set this out in Local Plan policy to support this approach. Reference to the inclusion of cascade mechanisms in s106 legal agreements should be included in the policy wording or supporting information to make it clear that these are to be included in all legal agreements.

A single percentage for affordable housing delivery, with flexibility in tenure and a clear viability pathway, should be adopted. The Local Plan should avoid cliff-edge steps that deter medium-sized sites and retain proportional review mechanisms to ensure deliverability.

Environmental Protection and Climate Resilience

The draft Local Plan includes a number of policies on managing and contributing to overcoming climate change. Planning policies should ensure that new development contributes to the collective effort to respond to this challenge. The approach taken in Strategic Policy CERS is supported.

Notwithstanding, Policy CER1 (Net zero carbon development standards) exceeds the sustainability requirements for new dwellings beyond that set out in the Future Homes Standards and current building regulations. CER1 requires “*all developments ... to achieve net zero carbon emissions*” in addition to the baseline reductions, with a local carbon-offset fund only as a last resort. The Future Homes Standard (FHS) aims for “*zero-carbon ready*” homes, not net-zero operational carbon on completion.

It would be advisable for Torbay Council to state that new residential development should comply with current building regulations and FHS. There is no evidence provided in the consultation document which outlines why new build residential development should not just comply with these existing stringent measures.

It is recommended that Torbay Council aligns its net-zero and renewable energy measures with the national Future Homes Standard trajectory. Rather than prescribing specific technology ratios, the Local Plan should focus on performance-based outcomes and allow for viability flexibility. This approach ensures that sustainability targets are achievable and do not compromise the deliverability of new homes.

Biodiversity Net Gain (BNG) should be maintained at the national baseline of 10%. The Local Plan should avoid stacking on-site ecological features that compromise design and density, and support site-level aggregation and canopy-equivalent tree replacement through off-site options where appropriate.