

**Draft Torbay Local Plan: A Landscape For Success – Summary of Representations and Issues received on Regulation 18 Pre-Submission Draft (Consultation 28th September- 9<sup>th</sup> November 2012)**

Note on coding. Comments that seek to change the wording of the Local Plan have been treated as “objections” for coding purposes. Many of these are not in-principle objections and can be addressed through editorial changes.

| <b>Organisations –Including Partner Bodies</b> |  |  |
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| <b>No</b>                                      | <b>Person/<br/>Organisation</b>                        | <b>Comment</b>   |
| 14/<br>Int<br>9                                | Carolyn Custerson/<br>English Riviera<br>Tourist Board | <ul style="list-style-type: none"> <li>▪ Support overall approach- support T1</li> <li>▪ T2 should allow for more tourist accommodation to become residential, in order to focus quality in CTDAS</li> <li>▪ Need for robust policing and enforcement of HMOs (H5). HMO issue should not be used to defend maintaining oversupply of accommodation.</li> <li>▪ T2, H5 Objection-but not in principle.</li> </ul> |
| 33/<br>Int<br>10                               | English Riviera<br>Geopark Coordinator                 | <ul style="list-style-type: none"> <li>▪ Refine wording on the Geopark</li> <li>▪ Mention the UNESCO endorsed Global Geopark as a USP</li> <li>▪ MI object. Refer to geodiversity.</li> <li>▪ P89 Mention other landscape designations</li> <li>▪ Various minor textual changes re Geopark.</li> </ul>   |
| 8/<br>Int<br>11                                | Torbay Coast &<br>Countryside Trust                    | <ul style="list-style-type: none"> <li>▪ General support. Various minor amendments re: environment and green infrastructure and safeguarding environmental/GI assets. (EN2 etc)</li> <li>▪ Detailed proposals/constraints map requested</li> <li>▪ Objections to wording (not principle of) SD1, SD2,TA1, TA2, EN1, EN2,C2, NC1, SD(all), Implementation (p180)</li> </ul>                                       |
| 13/<br>Int<br>12                               | Torbay Care Trust<br>(Debbie Stark)                    | <p>Strengthen plan to add clear targets supporting Marmot Review to improve relationship between planning policies and health:</p> <ul style="list-style-type: none"> <li>▪ active travel</li> <li>▪ open space</li> <li>▪ quality of (local) food</li> <li>▪ energy efficient housing</li> </ul> <p>▪ Schedule of comments: Object to TA1, TA2, IF1,IF4,EG1,SD1,SD2,EN1,EN2,EN3,C1,C2,SC1,SC2,SC3</p>           |

| No | Person/<br>Organisation      | Comment  |
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| 1  | Devon County Council         | <ul style="list-style-type: none"> <li>▪ Cross boundary matters – duty to cooperate</li> <li>▪ Need to base house numbers on latest evidence</li> <li>▪ Various minor comments especially re: waste and minerals, landscape character assessment. Objections to: Aspiration 4 EN1, EN2,W1, W2,W3, M1, M2</li> </ul>  |
| 2  | Teignbridge District Council | <ul style="list-style-type: none"> <li>▪ Cross Boundary matters- duty to cooperate, especially re housing numbers.</li> <li>▪ Support proposals at Edginswell (subject to maintaining strategic gap)</li> <li>▪ Object that housing levels not meeting objectively assessed need. Should be resolved as a Duty To Cooperate matter</li> <li>▪ Concern at retail proposal in Babbacombe SDT4<br/>Objections to TA2, EN2,C1, H1, SDT3, SDT4</li> </ul>   |
| 3  | South Hams District Council  | <ul style="list-style-type: none"> <li>▪ Cross Boundary matters- duty to cooperate, especially re housing numbers (but no overall objections).</li> <li>▪ Object that 750 jobs per year will lead to in-commuting.</li> <li>▪ Concern at impact of SDP3 Paignton West on landscape and traffic levels on A385.</li> <li>▪ Developments around Brixham should not undermine AONB.</li> <li>▪ Need to combine key diagrams and make diagrammatic designations more precise.</li> <li>▪ Concern about how development will come forward if not identified in Neighbourhood Plans (H1-H3 object).</li> <li>▪ Stronger protection of strategic gap between South Hams and Torbay requested.<br/>Objections to E1, TA2, EN1, EN2, C1, H1, SDP3, SDB3.</li> </ul> |
| 4  | English Heritage             | <p>General support, Needs to provide stronger support for proactive enhancement of historic environment, e.g. remove street clutter, require development to contribute positively to built environment.<br/>Mention Torbay's high quality environment as its USP. Support strong network of Green Infrastructure<br/>Needs to address NPPF para. 157. Requirements including proposals map.<br/>Objections to SD1 TC3, T2, TA1 TA2, EN1,</p>   |
| 5  | Natural England              | <ul style="list-style-type: none"> <li>▪ Support general approach. Development should avoid CSAC</li> <li>▪ Neighbourhood Plans will need SA/HRA which Council has a responsibility for.<br/>Object to E3</li> </ul>   |
| 6  | Network Rail                 | <ul style="list-style-type: none"> <li>▪ No overall objections. Edginswell Station supported</li> <li>▪ Section 106/CIL contributions towards rail infrastructure is required</li> <li>▪ Development should consider impact on level crossings via TIA and policy on level crossings requested.<br/>Object to IF1</li> </ul>   |
| 7  | Highways                     | Support TA1 and IF3 support.   |

|    | Agency   |   |
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| 9  | RSPB   | Object that implementation could harm wildlife – particularly impact on Cirl Buntings (object to H2, SD1)<br>Objection to SD1, SD2, H2, T2, SDP3,SDB3,SDT4, C1, E3, IF1, EN1, EN2, NC1, GS1, ER2,HE1, EG1, EG2, ER2, SC3, DE1<br>Habitat Regulations Assessment Objection- Mitigation measures needed to protect SAC and Marine SAC may not be adequate.  |
| 10 | Environment Agency   | Minor amendments suggested on Water Framework Directive, Flood Management, Water Quality.<br>Q2 –revise and expand section on flooding (bathing water quality, SAC, SSSIs, Green Infrastructure, Define contaminated land and Water Framework Directive at Glossary.<br>Object to SD1,SD2, EN1, EN2, C1 C2NC1, EG2, ER1, ER2, ER3, W5, M1, SDT1-3, SDP1-3, SDB2   |
| 11 | South Devon AONB Partnership                                   | Clearly set out difference between policy and explanation.<br>New policy on coastal change management (rather than fragmented elements in EN1, C2 and ER4). Need to show on a map the developed and un-developed coast areas<br>Strengthen policies C2, T1, T2, EN1, EN2 and SDB3 to make more protective of countryside and coast.<br>Object to: C1,C2, EN1,EN3, T1,T2, DE1, SDB3  |
| 12 | Sport England  | Object that evidence base isn't up to date (audit of pitches), request for CIL/Section 106 towards sports facilities.<br>SC2 should be made stricter in accordance with NPPF paragraph 74<br>Object to SD1, IF1, SC2, DE1, DE3  |
| 44 | Tetlow King for South West Registered Housing Providers (HARP) | <ul style="list-style-type: none"> <li>▪ Object that housing levels (SD1, H1 and H2) fail to meet projected population growth.</li> <li>▪ Need clearer basis to assess housing levels. 8-10,000 below DCLG 2010 statistical release and below SHMA, and don't take into account demographic trends (aging population): Detailed topic paper on housing evidence is needed.</li> <li>▪ Housing growth figures appear to ignore in-migration.</li> <li>▪ Trend based population growth is likely to be of 61% over 65 year olds which will exacerbate existing top-heavy age structure.</li> <li>▪ Plan does not have a clear affordable homes target. Need in the SHMA 2011 Update is for 2,520 affordable homes over 5 years. This does not seek to maximise affordable housing provision.</li> <li>▪ Sustainable construction/design etc. place viability burden on developers- would be simpler to align with Building Regs.</li> <li>▪ Need to clarify terms of policy, e.g. on what constitutes over-concentration, definition of self contained dwellings etc.</li> <li>▪ Support the principle of a space standard, but suggest that Parker Morris+10% standard is too high.</li> <li>▪ Need to review SHLAA evidence especially re: brownfield capacity</li> <li>▪ Support Policy H7 Housing for people in need of care , but current wording is too limited and criteria could be too restrictive (alternative wording provided).</li> <li>▪ Objections to: SD1, H1, H2, DE3,EG2, DE3 H2, H4, H7</li> </ul> |
| 88 | Paul Britton, Homes &  | <ul style="list-style-type: none"> <li>▪ Supports growth policy and focus on brownfield sites</li> <li>▪ Local Plan should promote self build housing</li> </ul>  |

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|    | Communicates Agency, via Limehouse              | <ul style="list-style-type: none"> <li>▪ H4 support affordable housing – should consider role of private institutional investment in affordable housing</li> <li>▪ Support SD policies on clear link between housing and jobs strategy</li> <li>▪ Needs to identify "funding packages" to bridge funding shortfall.</li> </ul>   |
| 15 | Marine Management Organisation (MMO)            | Mention role of MMO in relation to Policy C2 on the coast and major harbour developments (Policy T1,T2,C2).  |
| 16 | Woodland Trust                                  | Request stronger wording of IF1, EN1, NC1 to protect trees and ancient woodland and make specific reference to the health, environmental and other value of trees.<br>Torbay's land coverage is only 0.8% ancient woodland, compared to GB average of 2.4%<br>Object to IF1, EN1, EN2, NC1, C1   |
| 17 | Theatres Trust                                  | Mention Torbay's theatres at TC5, SDT1 or T1<br>Object to TC5,SDT1, T1   |
| 18 | Mobile Operators Association (MONO Consultants) | Generally support – amendments to IF2 suggested<br>IF2 Obj   |
| 19 | Stoke Gabriel Parish Council                    | <ul style="list-style-type: none"> <li>▪ Note need for cross boundary working with SHDC</li> <li>▪ Concern about development on A385 – traffic and water impact and tourism impact on Stoke Gabriel and flooding.</li> <li>▪ Important to preserve surrounding countryside and historic features for their tourism value.</li> <li>▪ Cross boundary working on Green Infrastructure is needed.</li> <li>▪ Storm water flooding issues will affect Stoke Gabriel</li> <li>▪ Shopdown Copse to Windmill Hill are the best areas of unconstrained wind supply. Not necessarily recommending a wind farm here, but areas should be safeguarded.</li> <li>▪ Object to SDP3, SDB3, EN2, C1: EG3 general ob.</li> </ul> |
| 43 | Fulfords – Western Power Distribution           | <ul style="list-style-type: none"> <li>▪ No overarching power constraints. Ask to be involved in major developments in proximity to or affecting major overhead power lines to ensure clearance and other operational matters.</li> </ul>  |
| 48 | Torbay Friends of the Earth                     | <ul style="list-style-type: none"> <li>▪ Maximise the use of brownfield sites/former landfill sites to minimise Greenfield land take.</li> <li>▪ Convert large buildings and hotels into apartments and infill between buildings or large verges.</li> <li>▪ Apartments can be suitable for family living</li> <li>▪ Support reduction in housing numbers from RSS</li> <li>▪ Walls Hill Quarry (Morrisons application site) should be considered for housing as well as St Marychurch Road adjacent to golf course.</li> <li>▪ Parts of contaminated land around the Willows also suitable for housing.</li> </ul>  |

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|    |   | <ul style="list-style-type: none"> <li>▪ Protect “greenbelt” between Torquay and Kingskerswell.</li> <li>▪ Coastal areas, King George V playing fields should be protected .</li> <li>▪ Scope to relocate “mini Las Vegas “ activities e.g casino, nightclub etc around Lawes bridge area rather than the Harbour</li> <li>▪ Council should promote self build housing strongly.</li> <li>▪ Promote art installation on eyesore buildings.</li> <li>▪ Promote community use of the harbour</li> <li>▪ Protect the seabed from dredging.</li> <li>▪ Oppose waste incineration.</li> <li>▪ Support high level of energy efficient design.</li> <li>▪ Object to SDT2, SDT3 ,C2, W4.</li> </ul> |
| 49 | UU Rainwater Harvesting Association   | <p>Council should promote rainwater harvesting and SUDS.<br/>(as part of EG1-3</p> <ul style="list-style-type: none"> <li>▪ Object to EG1-3, ER2</li> </ul>   |
| 50 | Stoke Gabriel Low-e   | <ul style="list-style-type: none"> <li>▪ Support thrust of environmental policies. Request more robust policies on sustainable construction, low carbon etc.</li> <li>▪ Require sustainable drainage and rainwater harvesting</li> <li>▪ Oppose incineration (W1)</li> <li>▪ Support for empty homes policy (policy should go further)</li> <li>▪ There is a shortage of allotments.</li> <li>▪ 30% affordable housing not likely to be achieved on market sites. Recommends the release of Council land for affordable housing.</li> <li>▪ Object to EG1,2,3, ER2, W1, SC1,DE1, H2,H4</li> </ul>   |
| 52 | Torbay District Labour Party  | <ul style="list-style-type: none"> <li>▪ Object that 8-10,000 homes will not meet housing needs or help regenerate the Bay.</li> <li>▪ Torbay’s economic and social problems have been exacerbated by a long term undersupply of housing.</li> <li>▪ Housing Assessment and RSS Secretary of State’s Proposed Changes recommended a higher housing level-15,000 dwellings/750 per year.</li> <li>▪ Need to take positive steps to improve the economy – can’t just rely on the SDLR.</li> </ul>   |
| 53 | Annie Lovell "Horsesense"   | <p>Need to provide for horses, cyclists and walkers in rural areas, particularly in links to Kinswear.</p> <ul style="list-style-type: none"> <li>▪ Object to SC2, SDP3 (not in-principle)</li> </ul>   |
| 62 | South Devon College.<br>Deidre Makepeace –<br>Tourism and Hospitality<br>Management<br>department | <ul style="list-style-type: none"> <li>▪ Keep beaches clean</li> <li>▪ Avoid run-down shops in tourist areas</li> <li>▪ Improve retail offer, support investment by big brands – bring higher standards and year round employment</li> <li>▪ Rigid enforcement of licensing</li> <li>▪ T1 observation – B&amp;Bs still have a role but are not a growth sector.</li> </ul>  |

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| 63  | Bridge Group of Hotels (Stuart Lewton, Commodore Paignton) | <ul style="list-style-type: none"> <li>▪ Policies T1 and T2 don't go far enough in releasing outdated stock of holiday accommodation</li> <li>▪ Too many HMOs in CTDAAs – need for policing of these areas.</li> <li>▪ Object to: T1, T2, H5</li> </ul>   |
| 104 | Torbay Local Access Forum                                  | <ul style="list-style-type: none"> <li>▪ Ensure access by wheelchair to footpaths and Cyclepaths. Refer to NICE Guidance 41: Walking and Cycling. Detailed design suggestions noted (e.g. cycle route barriers should be wide enough for wheelchair and scooter access, kissing gates should have radar key opening etc).</li> <li>▪ Treat as objection to TA1 and TA2</li> </ul>   |
| 47  | Torbay Civic Society                                       | <ul style="list-style-type: none"> <li>▪ Support for a range of policies, including overall growth strategy.</li> <li>▪ Refer to marine legacy</li> <li>▪ Provide free parking</li> <li>▪ Torbay needs to adapt to the modern world</li> <li>▪ Resist HMOs</li> <li>▪ Support Policy E2</li> <li>▪ Support flexibility in Policy TC4 and TC5 on town centres</li> <li>▪ Council should not cash in on CIL/New Homes bonus simply because they are an easy option for added income.</li> <li>▪ Need to provide a range of (modern) tourist facilities e.g. cable car</li> <li>▪ Support town centre policies, however concern at growing number of commercial street trader etc events.</li> <li>▪ Support strategy of focussing growth in the built up area.</li> <li>▪ Support transport strategy- would like to see improved rail links to Exeter and “pick up and leave” cycling facilities. General support for parking policies, although may not always be achievable in urban areas.</li> <li>▪ Flooding and drainage issues need careful attention- assurance needed from SWW that the Victorian drainage system will not be overwhelmed by level of development.</li> <li>▪ Development should not be motivated just by NHB/CIL</li> <li>▪ Consider other areas as ULPA: e.g. Petitor, Wellswood, Castle Road Park, Hollicombe Park (after development).</li> <li>▪ General support for historic and natural environment policies (note need to protect environment).</li> <li>▪ Concern that sport and recreation policies are not strong enough in protecting recreation facilities.</li> <li>▪ General support for housing numbers and GS policies.</li> <li>▪ Object to T1, SC2</li> </ul> |
| 49  | UU Rainwater Harvesting Association                        | <p>Council should promote rainwater harvesting and SUDS. (as part of EG1-3</p> <ul style="list-style-type: none"> <li>▪ EG1-3, ER2</li> </ul>   |
| 50  | Stoke Gabriel Low-e  | <ul style="list-style-type: none"> <li>▪ Support thrust of environmental policies. Request more robust policies on sustainable construction, low carbon etc.</li> <li>▪ Require sustainable drainage and rainwater harvesting</li> </ul>  |

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|     |   | <ul style="list-style-type: none"> <li>▪ Oppose incineration (WI)</li> <li>▪ Support for empty homes policy (policy should go further)</li> <li>▪ There is a shortage of allotments.</li> <li>▪ 30% affordable housing not likely to be achieved on market sites. Recommends the release of Council land for affordable housing.</li> <li>▪ Object to EG1,2,3, ER2, W1, SC1,DE1, H2,H4</li> </ul>  |
| 51  | Tim Godfrey,<br>for Bishop<br>Fleming                   | <ul style="list-style-type: none"> <li>▪ South Devon Link Road creates opportunities for new employment not just in the tourism sector but also hi-tech and manufacturing that will provide better paid jobs. The Plan needs to rise to this challenge.</li> <li>▪ 8-10,000 new dwellings will not even deliver on housing needs – it will not provide suitable and attractive accommodation for the high quality employees that the plan seeks to create employment for.</li> <li>▪ List of projects over the next 5 years focuses on tourism jobs- needs to create higher value jobs as well.</li> <li>▪ Need to provide more town centre office space to help businesses (such as Bishop Fleming) stay in the town centre.</li> <li>▪ Object to: SD1, H1,E1,TC1.</li> </ul> |
| 114 | South West<br>Trades Union<br>Congress via<br>Limehouse | <ul style="list-style-type: none"> <li>▪ Q1 Plan should promote <u>quality</u> jobs (there is a conflict between being competitive and providing a living wage).</li> <li>▪ Object to E1</li> </ul>  |

| <b>Neighbourhood Forums/ Torbay Community Bodies</b> |  |  |
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| <b>No</b>  | <b>Person/<br/>Organisation</b>  | <b>Comment</b>   |
| 20   | Torquay<br>Neighbourhood<br>Forum  | <p>Detailed 50 page representation representing a portmanteau of views from Forum members - main points only here!</p> <p>Part 1- reduce repetition</p> <ul style="list-style-type: none"> <li>▪ Support USPs- make section shorter, more emphasis on protecting greenspaces.</li> <li>▪ Housing should be linked to new jobs</li> <li>▪ In-migration assumptions too high. Census data should not be questioned.</li> <li>▪ Economic strategy places too much emphasis on SDLR.</li> <li>▪ Support use of local labour e.g. for SDLR</li> <li>▪ Need to improve road infrastructure within Torbay and to <i>need</i> to travel. Need for a park and ride serving Torquay</li> <li>▪ Protect green space</li> <li>▪ Too many jobs proposed (and lack of clear delivery mechanism)</li> <li>▪ There is an “oversupply of cheap accommodation which attracts less desirable tenants and perpetuates the supply of poor quality accommodation”</li> <li>▪ Bring empty homes back into use.</li> <li>▪ Support economic benefits of marine environment- but ecological and community benefits also need to be protected.</li> <li>▪ Strong support for town centre first approach. Object to reducing retail frontages</li> <li>▪ T1 – support reduction of PHAAs – should go further. Need to update tourism figures as evidence base is out of date.</li> <li>▪ Exclude Cockington from CTDA- give it special landscape protection.</li> <li>▪ Object to tall buildings</li> <li>▪ C1, NC1, stronger environmental policies requested</li> <li>▪ H1 and SDT policies – keep Torquay as a pleasant seaside resort, not a city.</li> <li>▪ Support HMO policy – need for inspection noted.</li> <li>▪ Implementation issues re: housing supply and CIL/Section 106 funding. Meaningful proportion of CIL should be clarified.</li> <li>▪ More detail of how Neighbourhood Plans will deliver the Local Plan is needed.</li> <li>▪ Habitats Regulations Assessment- should consider water quality and effect of run-off.</li> </ul> <p>Objections to, E1, E2, E3, E4, TC1, TC2,TC4, TC5, T1,T2, TA1, TA2, T1, , SD1, SD2, SDT1 , SDT2, IF1,IF3, IF4, EN1, EN3,C1, C2, NC1, HE1, EG1, EG2, ER1, ER2, ER3, W2, W3,SC1, SC2,SC3, SC4, DE3, DE4, H1, H2, H3, H4 , HRA</p> |
| 21   | Chelston,<br>Cockington and<br>Livermead<br>Partnership<br>(Leon Butler on<br>behalf of) | <ul style="list-style-type: none"> <li>▪ Comments also submitted through Torquay Neighbourhood Forum</li> <li>▪ Do more to support small local business/shops</li> <li>▪ Object to Cockington CTDA (Cockington should have stronger protection)</li> <li>▪ Reduce CTDA's further to reduce the oversupply of (protected) accommodation. Remove coach space standards for hotels</li> <li>▪ H1 – Housing should be linked to job creation</li> </ul>  |



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|    |                               | <ul style="list-style-type: none"> <li>▪ Object to T1, T2, E1,E3, E4 TC1, TC2, TC3, TC4, IF4,EN2, EN3, C1, ER3, W3, SC1, SC2, DE4, H1,H2,</li> </ul>  |
| 22 | Paignton Neighbourhood Forum  | <p>Covering letter and detailed schedule of representations - also submitted under separate cover by several Forum members.</p> <ul style="list-style-type: none"> <li>▪ SD1 object – scale and pace beyond 5 years, relies on in-migration and is too high.</li> <li>▪ Population growth is entirely driven by in-migration. Unique situation of decline in natural population. Need for updated assessment of housing need/requirement.</li> <li>▪ Growth level too high for balanced approach. 15,000 jobs will add problems, not solve them. Goes too far beyond objectively assessed requirement, with unsustainable consequences.</li> <li>▪ Refer to role of Neighbourhood Plans in determining new housing proposals (H3)</li> <li>▪ Include (at p29) clear monitoring of job led growth to ensure it is achieved</li> <li>▪ Should seek more than 30% affordable housing on large sites</li> <li>▪ Too great an emphasis on securing income as a driver of development. S143 of Localism Act only relates to determination of planning applications, not plan making.</li> <li>▪ Greater emphasis should be given to protecting marine environment.</li> <li>▪ Support town centres first approach, but object to reduction in Primary Retail frontage of Paignton and removal of Church Street.</li> <li>▪ Remove The Willows as a District Centre- functions as an out of centre retail facility.</li> <li>▪ Boundaries of CTDA should be drawn more widely- return closer to old PHAA boundaries and include Grange Road</li> <li>▪ Refer to reducing the need to travel in TA1</li> <li>▪ IF1 insufficient reference given to sewerage capacity+ need to remove surface water from foul drainage.</li> <li>▪ Landscape Character assessment has not given sufficient weight to value of Blagdon (currently AGLV).</li> <li>▪ Refer to value of countryside as source of food.</li> <li>▪ HRA- should consider the effect of water run off on water quality in Lime Bay.</li> </ul> <p>Object to SD1, SD2, E1, E2, E3, E4, H1, H4, TC1, TC2, T1, T2, IF1, IF3, TA1, EN1, EN2, C1, HE1, EG1, ER1, ER2, SC1, SC2, DE3, DE4, H1, H2, H3, H3, H4, SDT4, SDP1-4 SDB1-3, Implementation (P169), HRA</p> |
| 23 | Preston Community Partnership | <ul style="list-style-type: none"> <li>▪ Need to add detail to Local Plan – ensure implementation, be clear about where jobs will come from.</li> <li>▪ Refer to other matters that support growth e.g. parking policy.</li> <li>▪ Object to Torquay as Principal area. Paignton should have a bigger role</li> <li>▪ Preston should be promoted more – make it a CTDA and encourage more commercial activity.</li> <li>▪ Object to: SD1, E1, SD1, SDT1, SDP1, T1, SDP1</li> </ul>  |
| 24 | Brixham Parish Council        | <p>Number of minor amendments</p> <ul style="list-style-type: none"> <li>▪ Clarify meaning of jargon (e.g. SMART, housing need, bandwidth)</li> <li>▪ object to level of growth</li> <li>▪ housing too high</li> <li>▪ job growth rate too high</li> </ul>  |

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|    |   | <ul style="list-style-type: none"> <li>▪ more robust countryside protection policy requested</li> <li>▪ Support for most environmental policies- should be more robust.</li> <li>▪ Mention cross channel ferry</li> <li>▪ Minimum parking standard of 1 space per development (dwelling?) will be promoted in Brixham town centre: local plan should also adopt this.</li> <li>▪ Object to scope of village development boundary for Churston.</li> <li>▪ Object to, H1, SG1, E3, TC1, TC3, C1, T2, TA1, TA2, IF1, IF2, IF3</li> </ul>   |
| 25 | Galmpton Residents' Association   | <ul style="list-style-type: none"> <li>▪ Object to C1. Add more on agricultural use/ value of countryside for food production.</li> <li>▪ Mention Devon Metro rail link to Broadsands.</li> <li>▪ Object to C1,T1</li> </ul>   |
| 26 | Play Torbay (also Brixham Neighbourhood Forum Economy Sub Group and Churston, Galmpton and Broadsands Community Partnership). | <ul style="list-style-type: none"> <li>▪ Amend aspiration 5 to support new and enhanced recreational and leisure facilities, to promote health.</li> <li>▪ Object to emphasis on growth without reference to well being</li> <li>▪ Stronger framework of protection for AONB/SSS1 called for</li> <li>▪ Education should promote local skills more strongly</li> <li>▪ Tourism uses should be restricted from changes of use (T1 Obj).</li> <li>▪ Define jargon (GVA, USP, HMO, DCLG USP etc)</li> <li>▪ Refer to Torbay Port Harbour Master Plan (e.g. at E3)</li> <li>▪ Primary Shopping frontages in Brixham should be extended</li> <li>▪ Detailed comments about apartments/ retail/crafts in Brixham Harbour area</li> <li>▪ Park and Ride/improved access to Brixham is needed.</li> <li>▪ Band E of waiting list should not be counted as “objectively assessed housing need”,</li> <li>▪ Object to football pitches at Brockenbury- should be community use/agriculture/employment/low impact housing.</li> <li>▪ Object to SD2 ,E1, E2, TC3, SDB2, E3, TA2, IF2, T2, H3</li> </ul> |

| No. | Person/<br>Organisation              | Comment   |
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| 35  | Tesco's (Mark Scoot on behalf of)    | <ul style="list-style-type: none"> <li>▪ Need to support more growth. The level of growth promoted in SD1 will not reverse the Bay's economic decline.</li> <li>▪ Local plan fails to recognise that convenience retail is dominated by one retailer in Torbay</li> <li>▪ "B" uses are not viable without supporting development (specifically in Edginswell)</li> <li>▪ TC3 (particularly downgrading of the Willows) does not meet national policy.</li> <li>▪ Economic role of retail should be recognised e.g. in E2</li> <li>▪ Promotes Tesco at Edginswell Business Park.</li> <li>▪ No justification for new rail halt at Edginswell has been provided.</li> <li>▪ SD1 is supported (subject to above) but policies should recognise harsh economic climate re. BREEAM, CIL,</li> <li>▪ Object to hierarchy of the three town centres – each has its own catchment area</li> <li>▪ Development access requirements (50% non-car) are too onerous and not backed by evidence- even 20% is not achievable.</li> </ul> <p>Object to SD1, SDT4, E2, TA2, TC1, TC2, TC3, IF3, EG1, EG2, SDT1, SDP1, SDB1, SC1, E1</p>   |
| 36  | Boyer Planning (for Bloor Homes)     | <ul style="list-style-type: none"> <li>▪ Object to housing numbers, too low. Suggest range of 13,560-17,700 (17,700 needed to support 15,000 jobs). Fails to reflect national policy of increasing housing supply and does not reflect NPPF. Falls a long way short of need identified in the SHLAA (2011 Update) or reducing affordability gap. Fails to consider sustainability appraisal benefits (from 2009 Issues and Options Appraisal) of providing an urban extension or findings of RSS Sustainability appraisal/EiP findings that 15,000 dwellings is the appropriate level.</li> <li>▪ 15,000 jobs is too high – would result in in-commuting.</li> <li>▪ Object to requirement to provide on-site employment (second part of E1).</li> <li>▪ Support SDP3 – propose land west of Kings Ash Road north of Totnes Road. Paignton could assume a greater role in Torbay's Settlement Hierarchy.</li> <li>▪ Cumulative effect of DM policies on viability not taken into account.</li> <li>▪ Need for sport facilities should be set out in the Plan rather than assessed as part of development proposals (NPPF paragraph 73)</li> <li>▪ No objection to space standards/Building for Life so long as they are not a prescription.</li> <li>▪ Object to H1, H2, SD1, SDP3, SD1, E1, IF1, IF4, EG1, SC2, DE2, DE3, E1, SDP1.</li> </ul> |
| 37  | Devonshire Estates (Jillings Hutton) | <ul style="list-style-type: none"> <li>▪ Object that 8-10,000 homes does not meet objectively identified needs. "Bandwidth" approach does not provide certainty.</li> <li>▪ H2 (5 year Supply) policy is unnecessary</li> <li>▪ Meeting housing needs (including self build) should be set out as a USP.</li> <li>▪ SD2 is unnecessary as it repeats NPPF</li> <li>▪ Support SDP3 – West of Paignton. This is supported by the 2008 SHLAA. Existing sites such as Yannons Farm should be encompassed in this rather than a piecemeal approach. Development area should be more extensive in order to fund needed infrastructure e.g. Western Corridor improvements.</li> </ul>  |

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|    |                                    | Object to SD1, H1, SDP3, SD2, H2   |
| 38 | Heynes Planning for Welbeck Land   | <ul style="list-style-type: none"> <li>▪ Generally support key areas for growth. Reuse of urban brownfield sites is supported- TC1</li> <li>▪ Object that linking jobs and housing on sites is not a realistic approach</li> <li>▪ Criteria for allowing loss of employment is too tough-should be more flexible. Loss of employment contributions could harm viability.</li> <li>▪ Parking, environmental standards, design standards etc should be treated flexibly (considering viability etc)- not an objection in principle.</li> <li>▪ Caution needed with environmental, parking etc. standards.</li> <li>▪ Object to E1, E2, TC1, IF4, DE1, DE3</li> </ul>   |
| 39 | Heynes Planning for Taylor Wimpey  | <p>Support overall strategy and growth areas identified. However object that it does not support sufficient growth or private sector investment opportunity.</p> <ul style="list-style-type: none"> <li>▪ Evidence of housing requirement should be published (NPPF paragraph 159)</li> <li>▪ Object that 8-10,000 homes (400 dpa) is not enough to meet needs. A wide range of evidence needs to be considered. RSS level would be more appropriate.</li> <li>▪ 60% brownfield target is unrealistically high and more evidence behind windfall assumptions is needed.</li> <li>▪ Object to E1 requirement to provide 1.5 jobs per dwelling. Market forces should dictate where businesses locate to.</li> <li>▪ Greenfield land- especially Collaton St Mary should be brought forward to maintain supply.</li> <li>▪ Design criteria (DE1) should not be too restrictive.</li> <li>▪ Object to H1, SD1, E1,E2, EG1,H2, SPD3 (support-but should be brought forward).</li> </ul> |
| 40 | PCL Planning                       | <ul style="list-style-type: none"> <li>▪ GS1/H1 object 98-10,000 homes target is too low. Does not allow for in-migration or falling household size.</li> <li>▪ H4 object – 30% affordable housing is too high and not achievable.</li> <li>▪ Cumulative effect of development management policies will harm viability. Across the board assessment of viability is needed.</li> <li>▪ Object to H1,H4, SD1, DE1, DE2, EG1</li> </ul>  |
| 41 | White Young Green (for Sainsburys) | <ul style="list-style-type: none"> <li>▪ TC3 object. Object to treating the Willows differently to other District Centres. This does not reflect the retail hierarchy.</li> <li>▪ More expansion of The Willows and retail to west of Paignton is justified to cater for the expansion of these areas.</li> </ul> <p>Object to TC1, TC3</p>  |
| 42 | Cavanna Homes                      | <ul style="list-style-type: none"> <li>▪ GS object/H1 object – will fail to arrest Torbay's decline</li> <li>▪ 8-10,000 homes fails to meet needs. 5 year supply target will not address affordable housing need.</li> <li>▪ Economic value of the construction industry should be taken into account (1.5 jobs per dwelling and up to twice that number in the supply chain claimed). Most house building utilises local labour.</li> <li>▪ Other models that assess need e.g. NLP HeADROOM model indicate higher development needs than set out in the Local Plan.</li> <li>▪ Level of growth will not generate enough value to fund critical infrastructure.</li> <li>▪ Object to CIL policy.</li> <li>▪ Torbay should propose better infrastructure</li> <li>▪ Object to SD1,H1, H2,IF1 and implementation.</li> </ul>   |

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| 45 | Tetlow King for Northern Trust       | <ul style="list-style-type: none"> <li>▪ Strongly object to 8-10,000 homes. This level of growth fails to meet objectively assessed needs and will result in lack of affordable housing. Fails to meet objectively assessed needs.</li> <li>▪ Growth rate represents a reduction in house building rates from recent levels.</li> <li>▪ Object to 1-5 jobs per home target. Not justified by current evidence and is not practical to deliver. The Plan should consider economic benefits of house building and economic value of household spending- suggest this is about £14K per dwelling.</li> <li>▪ Failing to provide sufficient housing will harm economic prosperity.</li> <li>▪ Other Inspectors' decisions have rejected Plans that do not meet housing needs.</li> <li>▪ Object to relying on Neighbourhood Plans to identify sites- unlikely to come forward timeously and may not be justified by HRA or SEA.</li> <li>▪ Support SD2- presumption in favour of sustainable development.</li> <li>▪ Concern that gamut of design, local list, etc requirements could harm development viability: e.g. 30% affordable housing electric charging points, sustainable construction, local food.</li> <li>▪ Some "sustainable community" requirements go beyond scope of Section 122 "tests of lawfulness" in the CIL Regs.</li> <li>▪ Object that there is insufficient demand for self build homes. This could result in vacant plots.</li> <li>▪ Question housing split between 3 towns. Brixham figure is too low – it has 13.5% of population but only 10% of housing requirement. Brixham could accommodate greater number of homes without compromising AONB (e.g. Wall Park). .</li> <li>▪ General support for tourism policies T1 and T2, but policy needs greater clarity. And should be based on up-to-date data (i.e. later than 2007). Suggest that there are more holiday bedspaces available than assessed in "Turning the Tide".</li> <li>▪ Provide paragraph numbers for ease of reference. Clarify phrasing of policies. do "either" or "all" criteria need to be met in order fro development to be allowed?</li> <li>▪ Simplify Policy IF1 on contributions- need to reflect CIL Regs. Localism Act 2011 allows local finance considerations to be material when determining planning applications.</li> <li>▪ Clarify extent and level of protection for Urban Landscape Protection Areas.</li> <li>▪ Need for the Council to update its assessment of sports/recreation need- cannot be assessed retrospectively.</li> <li>▪ Design criteria should be more flexible- not reasonable to limit height to prevailing height in all instances.</li> <li>▪ Object to SD1, H1,H2, H4, E1, T2, IF1, IF4, EN3,EG1, SC1, SC2, SC3, DE1, DE2, DE3, DE4, H3, H4, SDT1, STB1, SDB3.</li> </ul> |
| 46 | Tony Abram (Queens Quay Development) | <ul style="list-style-type: none"> <li>▪ Support Aspiration 3. However, Torquay Town Centre is saturated with drinking establishments/clubs. Need to promote broader appeal in these areas and provide better balance of uses.</li> <li>▪ Object to TC5, SDT2</li> </ul>   |
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**Individuals. Many Submitted Comments as Members of Neighbourhood Forums and Appended Part of Forums' Representations.**

| No. | Person/<br>Organisation | Comment  |
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| 54  | Paula Tucker            | <ul style="list-style-type: none"> <li>▪ EG1 object. Simplify policy on sustainable construction and reduce threshold for testing to 100m<sup>2</sup> for commercial developments.</li> <li>▪ Current Legislation (Planning and Energy Act 2008) allows Building Regulation standards on energy efficiency to be exceeded.</li> <li>▪ Object to EG1 alternative wording provided.</li> </ul>   |
| 55  | Dr. Margherita Rendel   | <ul style="list-style-type: none"> <li>▪ T1 objects – promote heritage tourism e.g. in conjunction with railways, Agatha Christie</li> <li>▪ Policy should do more to promote alternative forms of transport, esp. trains, ferries, buses and walking. Better links to London, Plymouth and beyond are needed</li> <li>▪ No rail service serving the west of Paignton- Plan should promote bus links and extend rail links to Goodrington/Kingswear</li> <li>▪ Better bus frequency and indoor waiting facilities are needed.</li> <li>▪ Needs of (rural) walkers need to be given higher priority</li> <li>▪ Value the contribution made by an aging population.</li> <li>▪ Object to T1, TA1, TA2, IF3, EN2</li> </ul>         |
| 56  | Martin Edgell           | <ul style="list-style-type: none"> <li>▪ Support for much of the plan. 750 jobs per annum not achievable</li> <li>▪ Demand is low for housing so high housing growth may not be achievable .</li> <li>▪ Need for better road connectivity within Torbay.</li> <li>▪ Need for Park and Ride serving Torquay- lack of P&amp;R could jeopardise parking strategy.</li> <li>▪ Refer to “energy efficiency and Environmental Aspirations <b>not</b> climate change (aspiration 5 and EG2)</li> <li>▪ T1- support reduction in oversupply of stock. Mention SW Coastal Path. No need for harbour extension- cruise ships can moor offshore and use boats to bring passengers ashore.</li> <li>▪ Object to SD1, E1, T1 , EG2</li> </ul> |
| 57  | Barrie Wood             | <ul style="list-style-type: none"> <li>▪ Object to housing totals, 8-10,000 dwellings too high and goes beyond the requirement. Would be new housing area twice the size of Totnes</li> <li>▪ Suggests a new "home build" policy. C!, H1, H4</li> <li>▪ Many areas of support, particularly environmental protection.</li> <li>▪ Object to SD1, C1, H1, H4</li> </ul>  |
| 58  | Mr and Mrs A Box        | <ul style="list-style-type: none"> <li>▪ "Inadequate mechanism" for Torbay residents to inform policy</li> <li>▪ Challenges figures on housing need- detailed comments on counting of assessed need, should relate to waiting list bands A-D</li> <li>▪ Objection to 15,000 jobs – no evidence to support this rate of job growth, and will lead to extra need for housing.</li> <li>▪ Object to housing numbers</li> <li>▪ More protective/restrictive environmental/conservation policies are recommended. Specifically mention hedges and</li> </ul>  |

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|    |                    | <p>banks at NC1 and retention of stone walls/pillars at HE1 (C1, NC1, HE1)</p> <ul style="list-style-type: none"> <li>▪ Object to sports facilities at Brokenbury – should be agricultural, employment or low density housing.</li> <li>▪ (C1 point 5) recreation buildings in the Countryside should be single storey and of local stone.</li> <li>▪ Object to SD1, E1, H1, NC1, HE1, C1</li> </ul>  |
| 59 | Martin Cavanna     | <ul style="list-style-type: none"> <li>▪ Local Plan figures don't stand up – infrastructure gap is too large to be funded by the proposed level of growth</li> <li>▪ 30% affordable housing is not viable – Teignbridge is 25%. Need to increase overall housing numbers in order to enable provision of more affordable housing.</li> <li>▪ H1 objection – 8-10,000 homes is not enough to meet needs.</li> <li>▪ Seeking 1.5 jobs per home is not achievable, lack of mechanisms for securing jobs</li> <li>▪ Support local labour policy E4 up-skilling local workforce- but needs to be accompanied by sufficient development that will create jobs.</li> <li>▪ EG1 energy standards – should be left to Building Regulations.</li> <li>▪ Plan should have fewer policies and contain guidelines not requirements.</li> </ul> <p>Object to H1, SD1, E1, EG1, E4</p> |
| 60 | Sue Davies         | <ul style="list-style-type: none"> <li>▪ Promote tourism in Brixham, including Northern Arm</li> <li>▪ How is infrastructure funding assessed, and on what will moneys coming from Brixham be spent ?</li> </ul>  |
| 61 | John Claydon       | Make reference to sports clubs.   |
| 64 | Dr. R. Dixon       | <ul style="list-style-type: none"> <li>▪ Improve train services especially links to London</li> <li>▪ Council must set out a detailed shopping list of rail requirements. Should include maintenance of direct Paignton-Paddington service. Change at Newton Abbot is inconvenient and discourages tourists</li> <li>▪ Object to Edginswell –there is not a sufficient business case.</li> <li>▪ Support new Devon Metro links between Torquay and South Hams. Torbay should focus on Torbay's transport needs and not Exeter's.</li> <li>▪ Need to extend rail services to Goodrington/west of Paignton.</li> <li>▪ Upgrade the stations (detailed suggestions to upgrade them).</li> <li>▪ Object to TA1,TA2</li> </ul>   |
| 65 | Sue Harwood        | <ul style="list-style-type: none"> <li>▪ Need for an iconic building including improving access to, and use of existing buildings in Torbay.</li> <li>▪ Expand range of cultural facilities.</li> <li>▪ Need to improve wage levels. Public Sector pay freeze affects spending power in Torbay.</li> </ul>  |
| 66 | 'Mervyn and Janet' | <p>Object to any more homes. Will harm open space and lead to more empty homes.</p> <p>There are many empty homes that can be bought back into use.</p> <p>Provide jobs before housing.</p>   |
| 67 | Mr. E. Chandler    | <p>8-10,000 housing does not meet the Government's likely requirement. The rate of growth is below DCLG 2010 Household Projections and rate recommended by recent Inspectors. Acknowledge that Local plan figure is more realistic but an Inspector may require more.</p> <p>Tourism benefits from undeveloped environment. AONB in particular should be protected.</p> <p>Does not appear to be an objection to growth levels –but an observation.</p>   |

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| 68 | Susie Colley                               | T1 object. Object to development of Cockington – should be conserved.<br>T1 Object   |
| 69 | Leon Butler                                | <ul style="list-style-type: none"> <li>▪ Comments also fed into Torquay neighbourhood Forum’s comments (detailed issues noted there).</li> <li>▪ T1 object. Object to development of Cockington – should be protected.</li> <li>▪ Updated data on tourism trends should be included (update from 2007).</li> <li>▪ Coach parking requirements are too restrictive.</li> <li>▪ General presumption for building height is that it should keep within the existing height, with strict conditions if it exceeds it.</li> </ul> <p>Object to T1,T2, DE4</p> |
| 70 | Chris Smith                                | Clarify role of Article 4 Directions.  |
| 71 | Paula Hermes<br>(Part of<br>Paignton NF)   | <ul style="list-style-type: none"> <li>▪ Object to housing numbers and concomitant loss of countryside. Object to E1, 750 jobs per year and SD1/H1 housing totals (too many)</li> <li>▪ Not enough affordable housing proposed on large sites. Propose self build housing policy.</li> <li>▪ Teat as specific objection to SD1, SD2, E1, E2, E3, E4, H1, H4, TC1, TC2, T1, T2, IF1, IF3, TA1, EN1, EN2, C1, HE1, EG1, ER1, ER2, SC1, SC2, DE3, DE4, H1, H2, H3, H3, H4, SDT4, SDP1-4 SDB1-3, Implementation (P169), HRA</li> </ul>                       |
| 72 | Arthur Wright<br>( Part of<br>Paignton NF) | <ul style="list-style-type: none"> <li>▪ Scale of homes and jobs is too high. (as above)</li> <li>▪ Propose 'self build' policy.</li> <li>▪ Teat as specific objection to GS1, H1, E1, C1, H4 (in addition to above)</li> </ul>  |
| 73 | Martin Fox                                 | <ul style="list-style-type: none"> <li>▪ Scale of homes and jobs proposed is too high. Suggest a policy on "build your own affordable home".</li> </ul> <p>Teat as specific objection to GS1, H1, E1, C1, H4 (in addition to above)</p>  |
| 74 | Hazel<br>Robertson                         | As above   |
| 75 | Oma Hassan                                 | As above   |
| 76 | Neil James<br>(Paignton NF)                | As above   |
| 77 | Rick Hayes<br>(Paignton NF)                | As above   |
| 78 | Sheila Yakoob<br>(Paignton NF)             | <ul style="list-style-type: none"> <li>▪ Object to housing and jobs figure. Both too high</li> <li>▪ Calls for more robust policies on environmental protection and sustainability standards.</li> </ul>   |
| 79 | Patrick Keene<br>(Paignton NF)             | As above   |
| 80 | Arthur<br>Monthianvichlan                  | As above   |



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|    | chai<br>(Paignton NF)                    |   |
| 81 | Joanne<br>McQuillan                      | As above  |
| 82 | Jeanne Mangini<br>(Paignton NF)          | As above  |
| 83 | Barbara Kirby<br>(Paignton NF)           | As above  |
| 84 | Keith Osment<br>(Paignton NF)            | As Paignton Neighbourhood Forum – too many homes, for population protection should be higher rate of affordable housing.  |
| 85 | Andrew<br>Mackmurdo<br>(Paignton NF)     | As Paignton Neighbourhood Forum. Object to 8-10,000 new dwellings, and unsatisfactory target for affordable housing.  |
| 86 | Jean and John<br>Walker<br>(Paignton NF) | <ul style="list-style-type: none"> <li>▪ As Paignton Neighbourhood Forum. Object to 8-10,000 homes</li> </ul> Desperate need for affordable housing- Affordable housing Target should be higher than 30% on large sites. Self build affordable housing should be promoted.  |
| 87 | Andrei<br>Slipszenko                     | <ul style="list-style-type: none"> <li>▪ Housing and employment exceeds projected population growth- need for more evidence.</li> <li>▪ More development of brownfield sites should be promoted-60% is too low.</li> <li>▪ Desperate need for more affordable housing – more than 30% on large sites should be promoted. Self build affordable housing should be promoted.</li> <li>▪ Plan should promote modal shift towards low carbon transport (IF3 support)</li> <li>▪ Object to SD1, H1, E1, C1, H4</li> </ul>  |
| 88 | Jon Paul<br>Stribling                    | Letter as per no 87. Paignton Neighbourhood Forum comments attached.<br>Object to SD1, SD2, H1, E1, E2, C1, H4, (in addition to full list of Paignton Neighbourhood Forum's comments).  |
| 89 | R Billett                                | Letter as per no 87. Paignton Neighbourhood Forum comments attached.<br>Object to SD1, SD2, H1, E1, E2, C1, H4, (in addition to full list of Paignton Neighbourhood Forum's comments).  |
| 90 | Steve Miller                             | Standard letter submitted (Part of – but not all of - Paignton NF's letter. <ul style="list-style-type: none"> <li>▪ Plan should do more to reduce the need to travel, and improve network for sustainable transport,</li> <li>▪ Increase greenspace per development site</li> <li>▪ Additional ULPAs proposed (Paignton Green and Queens Park)</li> <li>▪ Mention food production and biomass in C1</li> <li>▪ EG1, EG2, EG3, ER1, ER2, W3, M1, W3 Simplify and make more comprehensive to provide higher environmental standards.</li> <li>▪ Policy M1 Should prohibit fracking.</li> </ul> |

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|     |                                 | Object to TA1, TA2, EN2, EN3,C1,EG1,EG2, EG3, ER1,ER2,W3, M1   |
| 91  | P King                          | As per Steve Miller (no 90)  |
| 92  | Elaine Madden                   | As per Steve Miller (no 90)  |
| 93  | Sean Collinson                  | As per Steve Miller (no 90)  |
| 94  | Gloria Lionnel<br>(Paignton NF) | Comments as per Paignton Neighbourhood Forum. Recommends a new self-build policy.<br><ul style="list-style-type: none"> <li>▪ Object to SD1, H1, E1, C1, H4 (in addition to full PNF list).</li> </ul>   |
| 95  | Andrea Stemmer                  | Letter as per no 87. Paignton Neighbourhood Forum comments attached.<br>Object to SD1, SD2, H1, E1, E2, C1, H4, (in addition to full list of Paignton Neighbourhood Forum's comments).   |
| 96  | Nikki Young                     | Letter as per no 87. Paignton Neighbourhood Forum comments attached.<br>Object to SD1, SD2, H1, E1, E2, C1, H4, (in addition to full list of Paignton Neighbourhood Forum's comments).   |
| 97  | Virginia Allum                  | Letter as per no 87. Paignton Neighbourhood Forum comments attached.<br>Object to SD1, SD2, H1, E1, E2, C1, H4, (in addition to full list of Paignton Neighbourhood Forum's comments).   |
| 98  | Howard Coakley                  | Letter as per no 87. Paignton Neighbourhood Forum comments attached.<br>Object to SD1, SD2, H1, E1, E2, C1, H4, (in addition to full list of Paignton Neighbourhood Forum's comments).   |
| 99  | Clive Richards                  | Letter as per no 87. Paignton Neighbourhood Forum comments attached.<br>Object to SD1, SD2, H1, E1, E2, C1, H4, (in addition to full list of Paignton Neighbourhood Forum's comments).   |
| 100 | Jessica Richards                | Letter as per no 87. Paignton Neighbourhood Forum comments attached.<br>Object to SD1, SD2, H1, E1, E2, C1, H4, (in addition to full list of Paignton Neighbourhood Forum's comments).   |
| 101 | John Gibson                     | Letter as per no 87. Paignton Neighbourhood Forum comments attached.<br>Object to SD1, SD2, H1, E1, E2, C1, H4, (in addition to full list of Paignton Neighbourhood Forum's comments).   |
| 102 | Stephen Morley                  | Letter as per no 87. Paignton Neighbourhood Forum comments attached.<br>Object to SD1, SD2, H1, E1, E2, C1, H4, (in addition to full list of Paignton Neighbourhood Forum's comments).   |
| 103 | Brenda Fitzgerald               | As per Steve Miller (no 90).   |
|     |                                 |  |
| 110 | Alan Forster<br>(Limehouse)     | Q2 promote more business parks – don't use suitable sites for housing.<br>E2 Object  |
| 112 | Stuart Lewton,<br>via Limhouse  | <ul style="list-style-type: none"> <li>▪ Plan still protects too much holiday accommodation. need to relax restrictions further. Strong nforcement of HMOs needed.</li> <li>▪ T1 and T2 object – (see number 63) as above</li> </ul>   |
| 113 | James O'Dwyer<br>via Limehouse  | <ul style="list-style-type: none"> <li>▪ "Aspirations" too woolly – need to be precise and realistic about what Plan seeks to achieve</li> <li>▪ Word the "sustainable community" is used: but most people don't know what it means.</li> <li>▪ Support aspirations, but suggest rewording to read: Better connected accessible Torbay; secure long term economic recovery and promote success; protect and enhance our heritage and natural environment; Encourage sustainable</li> </ul> |

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|     |                               | business and aspirational ideas; Quality educational opportunities and; Tackle disadvantage. (i.e. concerns about Aspirations 4 and 5)  |
| 115 | Tony Smyth via Limehouse      | <ul style="list-style-type: none"> <li>▪ Support T1 and T2 reduction in oversupply of tourism accommodation</li> <li>▪ Need to enforce against HMOs.</li> </ul>   |
| 116 | Janet Butler via Limehouse    | T1 and T2 object. Plans should go further in reducing oversupply of accommodation. Should not promote new hotels.   |
| 119 | John Rawson, via Limehouse    | <ul style="list-style-type: none"> <li>▪ Should be stronger emphasis on redevelopment of Torquay towns centre. A flexible approach should be adopted to allow widest range of uses e.g. call centres,</li> <li>▪ T1 object: there should be a 'free market' policy towards holiday accommodation, i.e. don't seek to restrict change of use.</li> <li>▪ Policies should be flexible to ensure development viability is not undermined</li> <li>▪ Do not waste money on a feasibility study for a new harbour</li> <li>▪ Resist out of town centre retail development</li> <li>▪ Western Corridor and town centre access improvements needed to improve circulation</li> <li>▪ Viability should not be put at risk by unrealistic developer contributions</li> <li>▪ Need for a proposals map/constraints map.</li> <li>▪ Review of open spaces and coastal areas is needed (Oddicombe /Babbacombe)</li> <li>▪ Range of comments but treat as Object to : T1,T2, TC1-4,, TA1, ,IF1, EN3,C2, EN2</li> </ul> |
| 120 | Gareth Fudge via Limehouse    | <p>Need to consider impact of night-time economy and manage conflicts of use and impact of alcohol more closely. Licensing Act has pushed back drinking and night time economy. Strong policy needed to rebalance the night time economy.</p> <ul style="list-style-type: none"> <li>▪ Object to TC5</li> </ul>   |
| 122 | Michael Webster via Limehouse | <ul style="list-style-type: none"> <li>▪ Make every effort to stop Torquay becoming a dormitory town or ghost town with too many second homes.</li> <li>▪ Protect the environment and rural areas- Redevelop existing areas rather than building on Greenfield sites.</li> <li>▪ Protect green areas between settlements.</li> <li>▪ New dwellings should be carbon neutral.</li> <li>▪ Rebuild the town centres (use compulsory purchase to get the land) with better retail facilities and free parking.</li> <li>▪ SD1, TC1,TC3,C1</li> </ul>  |
| 123 | Peter Lloyd                   | <ul style="list-style-type: none"> <li>▪ Neighbouring authorities can develop out of town retail, e.g. Kingsteignton, that impacts on Torbay</li> <li>▪ Need for a range of facilities and attractions, not just accommodation</li> <li>▪ Conversion of old buildings could lead to their lapse into HMOs- Plan should be bolder about allowing demolition of redundant/outdated properties.</li> <li>▪ Enhancement of of the environment should be a priority.</li> <li>▪ T1/T2 – reduce the oversupply of tourist accommodation.</li> <li>▪ Object to TC1,T1, T2, HE1</li> </ul>  |