

TORBAY LOCAL PLAN

A landscape for success:

The Plan for Torbay – 2012 to 2032 and beyond

PROPOSED SUBMISSION PLAN (FEBRUARY 2014)

TORBAY COUNCIL RESPONSE TO REPRESENTATIONS TO PROPOSED MAIN MODIFICATIONS TO THE SUBMISSION LOCAL PLAN

REPRESENTATIONS BY PERSON/ORGANISATION

Torbay Council – 22 April 2015

Explanatory note: Torbay Council Response to Representations to Proposed Main Modifications to the Submission Local Plan

Summary of this document

This document sets out the Council's comments on the consultation responses to the Proposed Main Modifications to the Torbay Local Plan 2012-32 and beyond "A landscape for success", by Person/Organisation. These were the subject of public consultation between Monday 9th February and Monday 23rd March 2015.

Representations on the Main Modifications and comments of the Council will be considered by the Inspector conducting the Examination of the Local Plan.

A separate Schedule of responses in order of Modification number has been produced.

Summary of Representations to Proposed Main Modifications

Background

The Local Plan was considered at an Examination Hearing between 18th-20th November 2014. The Inspector's Initial Findings were received on 15th December 2014. In the interim the Council had submitted additional information to the Inspector including a Schedule of suggested Main Modifications to the Proposed Submission Plan' (11th December 2014). Following receipt of these Suggested Modifications, the Inspector issued Further Findings on 23rd December 2014.

The Council published a Schedule of Proposed Main Modifications for consultation in February 2015, drawing on the Inspectors' Initial and Further Findings. The Proposed Main Modifications relate to matters that go to the heart of the Local Plan's soundness. In summary they relate to:

- Adjustment to increase the overall housing numbers to 10,000 dwellings between 2012-32
- Clarification of process to bring forward site allocations plans if Neighbourhood Plans are not submitted by October 2015, or if there is a danger of five year supply not being maintained.
- New proposed Future Growth Area south of White Rock
- Identification of additional potential housing sites for consideration through Neighbourhood Plans
- Reduction to the threshold for testing retail impact of convenience (food) stores.

A Schedule of "Additional Modifications" dealing with matters that were not considered to go to the heart of the Local Plan was also published for consultation alongside the Main Modifications.

Responses Received on the Proposed Main Modifications

The Main Modifications generated significant public interest, with around 280 individuals and organisations making comments. By volume of objections, the proposals for development at Steps Cross Torquay and White Rock, Paignton generated the most objections (145 letters plus a 75 signature petition, and 91 letters respectively). However, a number of other issues have been raised by representations.

The main issues raised by the Proposed Main Modifications consultation are as follows:

- Objections to growth levels from Paignton Neighbourhood Forum and others. This includes a detailed assessment of the 2012 based household projections, and infrastructure/ environmental capacity (Principally MM1 and Policy SS1).
- Objections by the three Neighbourhood Forums about Modifications for the Council to prepare site allocation plans should neighbourhood plans not be submitted by October 2015 (Principally MM2).
- Objections by Natural England about the likely significant impacts of additional sites identified in the Main Modifications both in terms of greater horseshoe bats ((South Hams Special Area of Conservation) and impact on the candidate Marine Special Area of Conservation. The Council is in discussion with Natural England and has commissioned additional ecological work to assess whether these objections can be overcome (Principally MM1 and MM3, Policy SS1 and SS2).
- Objections to the identification of Steps Cross, Torquay as a potential housing site on the basis of loss of recreation facility, traffic impact and effect on nearby schools. (145 emails/letters and a petition with 75 signatures). The Council has discussed this matter with Sport England and colleagues in Residents and Visitor Services. It is considered that investment in the nearby King George V playing fields can address NPPF paragraph 74 issues relating to Steps Cross (MM9 and MM14).
- Objections to the identification of land south of White Rock as a Future Growth Area from organisations and individuals, on the basis of landscape, ecology, transport and the implications of the 1997 Secretary of State's Decision, which was considered by many to remain relevant (91 letters as well as comments by organisations such as Natural England). Some house builders argued that Collaton St Mary is a less constrained area for additional growth. There were also some comments from house builders about the deliverability of development on car parks (Principally MM3).
- Support for the identification of St Marys Campsite, Brixham as a potential housing site. However, objections have been received from environmental organisations (including Natural England) about harm to greater horseshoe bats. This is also reflected in further work on the Council's Site Assessment HRA (Principally MM14).

Broad Conclusions on the Implications of Representations Received

Basis for conclusions

The Council considers that it is in the overriding interest of delivering sustainable development in Torbay that a robust and sound Local Plan is adopted as quickly as practicable. The Submission Version of the Torbay Local Plan, with the changes agreed before and during the Hearing, evidently provides a robust starting point for the way in which this can happen.

To help achieve this objective, the Council has positively and proactively explored options for the provision of housing land in Torbay. This work has been supported by a substantial amount of evidence commissioned by the Council. The evidence relating to environment, biodiversity and infrastructure supports the Council's position, as set out in the Submission Version of the Local Plan, that Torbay can accommodate between 8 – 10,000 new homes during the Plan period.

The Council's advice, before and during the Hearing, was that provision of additional housing land (above that proposed in the Submission Version of the Plan) was likely to breach the Bay's environmental limits. This advice was based on evidence available at that time, including assessment of other options/ locations for growth in the Bay, and a detailed knowledge of Torbay's environmental characteristics. Torbay's environmental sensitivity is acknowledged in the Inspector's Interim and Further Findings. The Council's own work and responses to consultation on the Main Modifications confirm that provision of significant additional housing land, above that previously identified,

might - on the basis of evidence available at this time - breach the Bay's environmental capacity for growth. The responses to consultation also suggest that, to achieve the level of certainty required for allocation, specifically for sites promoted by land owners at the Hearing, further evidence (on ecology, landscape impact and agricultural land) is needed to meet the requirements of European legislation and national planning policy. That evidence, specifically on ecology, will not be available until at least October 2015; any delay in the progression of the Examination to obtain this information would work against the need for adoption of the new Local Plan to take place as soon as possible.

Possible ways forward in relation to housing growth

In the light of the representations received on the recently published Proposed Main Modifications to the Submission Local Plan, the Council has had to give careful consideration to the concerns raised by allocating Land South of White Rock as a key additional housing site, and to the implications for the Local Plan.

If the Inspector is minded to explore further the potential offered by White Rock, in order to maximise opportunities to meet the 10,000 homes target sooner rather than later, an option could be to retain the proposed Future Growth Area extension into land south of White Rock but on a more restricted site area. This is illustrated on the Plan in Appendix 1. This would correspond only to the area being actively promoted by Abacus / Deeley Freed and within the developer's control (Phase 1). The Council believes, however, on the basis of advice to date, this option to be less than satisfactory. This is because it may be at risk of challenge due to the likely environmental impacts of such development, and lack of certainty about the extent of mitigation in compensation for such impacts. Such a challenge could in turn undermine adoption of the new Local Plan.

Nevertheless, because such an approach would necessarily be required to comply with policies in the Submission Version of the Plan (as amended by the Proposed Modifications), the risk of challenge and of unacceptable environmental impact might be reduced, particularly if reinforced through an agreement to test the scale and nature of growth within Phase 1 through masterplanning based on provision of further evidence. Given the arable use of land to the north of the site and predominantly pasture land to the south (and thus more likely to have greater ecological value), it may also be prudent to limit growth to the northern part of this reduced Future Growth Area extension, and require ecological and environmental enhancements to the southern part of the site. Such a requirement would provide a guarantee of on-site mitigation, a stipulation that would necessarily be included in the Local Plan.

If this approach were taken the resultant masterplan could then be adopted by the Council, as a Supplementary Planning Document, within 5 years. As suggested above, this approach accords with the Council's approach regarding Future Growth Areas at Torquay Gateway and Collaton St Mary. The policy wording agreed with Natural England, before and during the 2014 Hearing, would ensure environmental impacts are taken into account and mitigation work undertaken, and that significant development would not proceed if environmental impacts could not be mitigated. At this stage, given the uncertainty over the potential scale / nature of development and environmental impacts, any such allocation would clearly need to be subject to the caveats set out in Policy SS2, SS8 and NC1. This approach would provide a greater degree of certainty (than non-allocation) that up to 9,760 new homes could be provided over the Plan period.

Council's preferred approach

Notwithstanding the above possibilities, the Council believes the most expedient way forward is to exclude from the Plan both the allocation of the new site on land south of White Rock and the additional 'Appendix D' housing site at St Mary's campsite. It is the Council's view that such changes to the Proposed Main Modifications would not require further advertisement and consultation. The Council considers it unlikely that further consultation, or indeed a further Hearing to cover land at White Rock in particular, would reveal any more issues or evidence than already available and taken into account. However, they would evidently need to be considered by the Inspector and addressed in his Final Report. The Council has set out below the changes it proposes to the Main Modifications. These proposed changes have been informed by further evidence (for example

regarding ecology) and the responses to public consultation on Main Modifications. The Proposed Main Modifications, as amended where indicated in the schedule below, represent the changes that the Council wishes to be taken forward into the Adopted Local Plan via the Inspector's Final Report.

This approach would allow the Plan, with the inclusion of other acceptable sites put forward by the Council in the Main Modifications consultation document, to provide for 9430 new homes (i.e. 8950 plus some previously 'excluded' sites) during the Plan period. A full review of the Plan, in 5 years, would include an assessment of the potential offered for further growth by the inclusion of land south of White Rock, building on the work already undertaken and expanding that work in the meantime, particularly through the collection of additional critical ecological evidence. Sufficient land is committed within the Plan to maintain a rolling five year supply of housing. This is the approach that the Council wishes the Inspector to take forward to his Final Report.

In conclusion, the Council believes that at this stage it would be prudent for the new Local Plan to provide for 9430 new homes. That number could then be increased in due course, and the annual rate of delivery recalculated, depending on the outcomes of additional survey work and masterplanning work for land immediately south of White Rock. The Council considers there is scope for new homes, commercial space and infrastructure and ecological / environmental enhancement on this land, and the Council supports a positive planning framework to help bring that forward. Taking a precautionary approach to such growth, this might comprise one third of the site reserved for mitigation and two thirds available for development. However, until the scale, type and impacts of that development are better understood it would be premature to be specific about the number of new homes to be added to the baseline of 9430.

The responses below should be considered in the context set out above.

Full Objectively Assessed Need (FOAN). The objections made about the overall growth levels and strategy are similar to matters raised in previously stages. These have been discussed in the Council's Growth Strategy and Capacity for Change Topic Paper (SD24) and the Housing Requirements Topic Paper (PBA 2013, SD56). It is noted that the 2012 based (2015) Household Projections are lower than the Interim 2011 Based Household Projections. However, based on good evidence, the Council is planning to achieve economic recovery and growth. Consequently, the Council accepts the Inspector's Initial Findings view that FOAN will be higher than the household projection figure if economic growth is achieved, as per the Housing Requirements Report.

Trigger point for preparation of Site Allocation Plans. In response to Neighbourhood Forums' objections about the trigger point for submission of Neighbourhood Plans, it is recommended that the deadline be extended from October 2015 to 31 March 2016. It appears from monitoring and developer interest, that some development on sites indicated in Future Growth Areas is highly likely to arise before 2023, provided infrastructure constraints can be overcome. This reduces the danger of a shortfall in five year supply after 2017.

Environmental Capacity / additional sites. The objections raised by Natural England, AONB Partnership and others highlight the environmental constraints faced by Torbay, and the difficulty in achieving a growth trajectory of 10,000 dwellings without greater certainty about the environmental impacts.

As indicated in the schedule below, discussions are ongoing with Natural England, Kestrel Wildlife Consulting Ltd and the Council's Urban Design officer and drainage engineers about the extent to which Natural England's objections could impact on the possible development of land **South of White Rock**. However it is clear that further evidence on the likely impact on ecology and agricultural land will be required before the site south of White Rock can be allocated for development in the Local Plan. It is recommended that the greenfield land at **St Marys Campsite, Brixham** is deleted as a pooled housing site due to likely impact on greater horseshoe bats (and the South Hams SAC).

Other proposed housing sites, including **Steps Cross, Torquay** and **Churston Golf Club** appear to be developable in principle and should be retained in the pool of sites in Appendix D of the Submission Local Plan for identification by Neighbourhood Forums for inclusion in Neighbourhood Plans. It should be noted that Neighbourhood Forums are able to allocate other sites, and exclude identified sites, if those other sites are shown to be developable and deliverable.

Note that discussions are ongoing with regard to Natural England's comments on the SA/HRA, which are linked to overall growth levels.

What happens next?

The representations on the Proposed Main Modifications, along with the Council's response to them, will be considered by the Inspector conducting the Examination of the Local Plan, who will take them into account in the preparation of his final report on the soundness of the Local Plan.

Representations on Main Modifications * Objections unless otherwise stated					
ID	File No.	Person /Organisation Consultee	Modification/ Policy No.	Summary of Representations Made	LPA Response
Partner organisations					
843212	P1	Torbay Coast and Countryside Trust	MM1 MM3 MM12 MM14 SS1, SS2, SDB1	Concern that 10,000 dwellings will result in loss of greenfield sites, especially White Rock and St Marys. Impact on greater horseshoe bats and cirl buntings. Loss of recreation/green space.	Objections to land South of White Rock are noted. Please see response below to Natural England's comments and more detailed assessment in the schedule of representations by Modification/Policy Number
438366	P2	South Devon AONB Partnership	MM3 MM14 SS2, SDB1	Object to inclusion of White Rock and St Marys campsite: impact to AONB and rural setting. If sites are to be allocated there would need to be a comprehensive assessment of impact on the AONB.	Objections to land South of White Rock are noted. Please see response below to Natural England's comments and more detailed assessment in the schedule of representations by Modification/Policy Number. Abacus has submitted a detailed landscape assessment as part of their representations. This is being assessed by the Council's Urban Design Officer to consider whether this meets the Landscape and Visual Impact Assessment requirements.
National organisations					
843585	NO1	Environment Agency	MM10/MM14 General observation SDB1, SDB2	Overall support. Mention the need for flood defence (from wave action) at Paignton Harbour, Victoria Car Park and Station Lane.	Overall support noted. Make a further Additional Modification to refer to the need to protect from flood risk arising from wave action in SDP1/paragraph 5.1.2.3
400188	NO2	Natural England	SA/HRA MM1 MM3, MM9, MM10, MM11, MM14 obj Concomitant comments on AM17,19,29, 30, 34 ,64, 70,76,99, 100,	Insufficient consideration of in-combination effects of additional sites. Concerns about White Rock (biodiversity, agricultural land etc), St Marys, Churston Golf Club, Sladnor Park. Concerns about impact of Combined Sewer Overflows on Marine candidate SAC. AM29, 30, and 34,64,70 (safeguards within environmental polices etc) should be Main Modifications, as they go to the heart of the	The Council have commissioned Greenbridge Ltd (M J Oxford, formerly Kestrel Wildlife Ltd) to assess the in-combination HRA impacts of the new sites raised by Natural England. More detailed discussion is set out in the companion schedule of Representations to Main Modifications by Modification/Policy Number. However the Council considers that that further evidence on the likely impact on ecology and

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ID	File No.	Person /Organisation Consultee	Modification/ Policy No.	Summary of Representations Made	LPA Response
			104, 113, 116, 119, 120, 121,122,124, 156, 163, 167, 171, 177 SS1, SS2, SDT1, SDP1, SDB1	Local Plan.	<p>agricultural land will be required before land south of White Rock can be allocated for development in the Local Plan.</p> <p>It is recommended that the greenfield land at St Marys Campsite, Brixham is deleted as a pooled housing site due to likely impact on greater horseshoe bats (and the South Hams SAC).</p> <p>The Council considers that Sladnor Park, Maidencombe and Churston Golf Club, Churston appear to be developable in principle and should be retained in the pool of sites in Appendix D of the Submission Local Plan for identification by Neighbourhood Forums for inclusion in Neighbourhood Plans.</p> <p>Whether environmental safeguards should be treated as Main Modifications</p> <p>The Council made significant modifications to the Submission Version of the Local Plan to seek to overcome Natural England's initial concerns (specifically to Policies SS8, NC1, ER2 and W5). The Inspector's Further Findings (paragraph 6) indicated that Main Modifications should only relate to matters which go to the heart of the Plan, and that many of these changes could be considered as additional modifications. The Council has sought to follow this advice.</p>
501495	NO3	Sport England	MM14 Object SDT1	Object to inclusion of Steps Cross as a possible future housing site. Fails to meet tests in NPPF 74 and Sport England's Playing Fields Policy. Support AM139 and AM150	Steps Cross is identified in the Torbay Playing Pitch Strategy as being substandard. Discussions have taken place between Sport England and the Council's Residents' and Visitor Services. These have confirmed that the Playing Pitch Strategy would support tying in development of Steps Cross playing field with investment in the nearby King George V playing fields (East of Teignmouth Road, 250 metres from Steps Cross), to achieve an overall improvement in provision. On this basis development could meet the tests in NPPF paragraph 74.

Neighbouring Local Authorities, Neighbourhood Forums, Community Partnerships, Parishes and Amenity Societies

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ID	File No.	Person /Organisation Consultee	Modification/ Policy No.	Summary of Representations Made	LPA Response
438382	AFC 1	South Hams District Council	MM2, MM10, MM11 SS2, SDP1, SDP3	<p>Concern that under utilisation of Collaton St Mary's potential will place pressure on more sensitive sites.</p> <p>South of White Rock is sensitive in terms of the AONB and LEMP for phase 1 of the White Rock development.</p> <p>There is limited capacity in South Hams to accommodate overspill growth from Torbay.</p>	<p>Collaton St Mary</p> <p>Collaton St Mary has been the subject of detailed Masterplanning. The Masterplan has assessed the landscape impact of development. It is noted that the strongest developer interest relates to the North of Totnes Road, which some objectors consider to be the more sensitive in landscape terms.</p> <p>Whilst detailed schemes may demonstrate higher numbers of dwellings are achievable without causing undue landscape or greater horseshoe bat/biodiversity impact; Torbay Council has not received evidence to show how this could be achieved. On this basis it considers that the capacity identified in the Masterplan is the most justifiable figure, based on the available evidence.</p> <p>The Council does not consider it is appropriate to increase the housing requirement at Collaton St Mary simply because of sensitivities at land south of White Rock. Each site should be considered on its merits and the extent to which development impacts can be mitigated.</p> <p>Land South of White Rock</p> <p>Objections to land South of White Rock are noted. Please see response below to Natural England's comments and more detailed assessment in the schedule of representations by Modification/Policy Number.</p>
900125	AFC2	Dittisham Parish Council Dr Annette Thom	MM3 General observation SDP3	Request that road infrastructure be improved to anticipate demand arising from White Rock.	Issue noted. If development were to proceed at land south of White Rock, highway impacts would need to be addressed through S106/S278 agreements. However, as noted above, there are other issues affecting the site that need to be addressed prior to any development taking place.
418700	AFC3	Stoke Gabriel Parish Council	MM1, MM2, MM3, MM4, MM5, MM6, MM7, MM8,MM10, MM14.	<p>Endorse Paignton Neighbourhood Forum's objections (Q.V.)</p> <p>Object to MM3 land south of White Rock- landscape, ecology, transport impact, loss of agricultural land, light pollution and effect on</p>	<p>See response to Paignton Neighbourhood Forum's comments below.</p> <p>Objections to land South of White Rock are noted. Please see response below to Natural England's comments and more detailed assessment in the</p>

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			SS1 etc, SS2, SDP3	Stoke Gabriel.	schedule of representations by Modification/Policy Number.
468630	AFC4	Kingswear Parish Council	MM3 object SS2, SDP3	Object to land south of White Rock-encroachment into open countryside.	Objections to land South of White Rock are noted. Please see response below to Natural England's comments and more detailed assessment in the schedule of representations by Modification/Policy Number.
817474	AFC5	Torquay Neighbourhood Forum	MM2, MM7 MM8, MM9 MM12, MM14 SDS12 SS12 SDT1	Object to Masterplans being formalized as planning policy outside of the Neighbourhood Plan process. Object to the Council taking over site allocation (preparing DPDs) if the Forum is unable to meet the deadline of October 2015. May 2016 is a more reasonable deadline. Future development sites should be determined through the Neighbourhood Plan. Object to additional housing sites- these have not been independently assessed and are potentially unsound.	Objection to site allocation outside of the Neighbourhood Plan The additional sites identified in MM9-11 and MM14 are part of the pool of sites from which the Neighbourhood Plans should draw sites for inclusion in Neighbourhood Plans. The additional sites (in MM14) have been assessed by the Council and subjected to SA. They are not necessarily a definitive list but are based on sites identified in the SHLAA. It is acknowledged that there is limited headroom to omit particular sites, but some scope does exist particularly if alternative deliverable sites are identified by the Neighbourhood Forums. Deadline for Neighbourhood Plan Submission. The Inspectors' Initial Findings (para 8) and Further Findings (para 7) indicate that a trigger point should be set out for commencement of site allocation plans, to avoid a potential policy vacuum in 2017. The Modifications have sought to address this issue (see also MM7 and MM8 below). Torquay Neighbourhood Forum's suggestion that the deadline for Neighbourhood Plan submission to the Council be extended to June 2016, to allow time for preparation, is a constructive one. There is a good and agreed evidence base, reasonable progress on Neighbourhood Plan preparation and a clear pool of identified sites. On this basis the Council believes that Site Allocation DPDs could be brought forward more speedily than if starting from scratch. The five year housing land supply position is monitored on an annual basis and it appears that some development in Future Growth Areas will come

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					<p>forward before 2023, provided that infrastructure issues are addressed.</p> <p>Masterplanning is nearly complete at Torquay Gateway/Edginswell (SS2.1 and SDT3) and the area is expected to come forward before 2023 (so will be included in the 5 year supply stock at 2017).</p> <p>On this basis it is considered that the deadline for submission of Neighbourhood Plans may be extended to 31st March 2016 without risking a policy vacuum in 2017, or undermining the Council's 5 year housing land supply position.</p>
704914	AFC6	Paignton Neighbourhood Forum	<p>MM1, MM2, MM3, MM4, MM5, MM6, MM7, MM8, MM10, MM14.</p> <p>Concomitant objections to AM23, AM74, AM129, AM130, AM169, AM178. SS1 etc SS12 SDP1 SDP3</p>	<p>Object to housing rates in excess of 8,300 dwellings. Growth rate not justified by evidence of need- 2012 based HH projections are lower than 2011 based ones. 2012 population projections show above trend rate of inwards migration and are therefore a "policy on" figure which account for economic recovery.</p> <p>Object that the Local Plan is not jobs led, but seeks to front-load housing inspite of evidence of past oversupply of housing which has sated the housing market. A clearer jobs led approach should be taken in the Modifications.</p> <p>Growth cannot be accommodated within environmental/ infrastructure capacity (especially drainage capacity).</p> <p>Plan is not jobs led, but housing led: there should be a clearer linking of housing and job numbers.</p> <p>Object to mechanism to produce site allocation documents if Neighbourhood Plans are not submitted by 2015: NPPF requires only 10 year housing provision.</p> <p>Objections and recommended amendments to a number of Additional Modifications.</p>	<p>Overall Strategy</p> <p>Paignton Neighbourhood Forum's concerns about the level of growth and assessment of full objectively assessed need are noted. These have been discussed in the Council's Growth Strategy and Capacity for Change Topic Paper (SD24) and the Housing Requirements Topic Paper (PBA 2013, SD56).</p> <p>It is noted that the 2012 based (2015) Household Projections are lower than the Interim 2011 Based Household Projections, and the Council is grateful to the Forum for their analysis of these. However, the Council accepts the Inspector's Initial Findings view that FOAN will be higher than the household projection figure if economic growth is achieved, as per the Housing Requirements Report.</p> <p>Plan is not jobs led.</p> <p>Paignton Neighbourhood Forum's argument that the Plan should be jobs led is well documented in other documents. The Local Plan seeks to provide jobs and sets out an ambitious strategy for economic growth (E.g. Policies SS1 and SS5). The Plan also undertakes to monitor the creation of jobs as part of annual and five yearly reviews. This could allow a downwards estimation of FOAN should jobs growth is not realized.</p> <p>While the Council is highly supportive of the need to improve economic prospects, Officers do not believe</p>

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					<p>that there is a justification in the NPPF to implement rigid limit on new homes until new jobs are created. Nor would this approach be conducive to economic growth.</p> <p>Environmental Capacity The Council agree that environmental capacity is a critical issue. See response to Natural England above. The Submission Local Plan and Proposed (Additional) Modifications seek to address sewerage capacity through sustainable drainage measures.</p> <p>See response to Torquay Neighbourhood Forum on the deadline for submission of Neighbourhood Plans. However the Local Plan does require neighbourhood Plans to make site allocations (of sites within the pool in Appendix D of the Local Plan and SS1/or other sites as identified by the Forum).</p>
828890	AFC7	Brixham Neighbourhood Forum	MM1 MM3 MM9 Gob MM12 MM14 SS1 etc SS12 SDB1	<p>Object to growth levels –endorse Paignton Neighbourhood Forum’s assessment of FOAN. 2012 Household Projections are lower than 2011 based ones.</p> <p>Object to increase in housing numbers in Brixham Peninsula. Greater level of masterplanning is needed to assess scope for growth e.g. as per Collaton St Mary</p> <p>Object to allocation of land south of White Rock. (previous S of S Ruling).</p> <p>Object to retention of Golf Club site (not deliverable) and St Marys Bay (need more evidence of environmental impact).</p>	<p>See response to Natural England and Paignton Neighbourhood Forum above.</p> <p>It is noted that land South of White Rock falls within the Brixham Peninsula Neighbourhood Plan area. Please see response below to Natural England’s comments and more detailed assessment in the schedule of representations by Modification/Policy Number</p> <p>Developability of Churston Golf Club. The Council concurs with Natural England’s comments that the 1st and 18th hole site is itself relatively unconstrained, but the difficulty is in identifying a replacement clubhouse and 1st/18th hole site.</p> <p>The Council consider that this issue is not insurmountable in the medium term and it is therefore appropriate to retain the site as a site for identification by the Brixham Peninsula Neighbourhood Plan.</p> <p>Developability of St Marys Campsite. Natural England’s, AONB Partnerships and the Coast and Countryside Trust’s, and Brixham Peninsula Neighbourhood Forum’s comments on St Mary’s Campsite are noted. The Council’s own assessment</p>

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					<p>of likely impact on greater horseshoe bats (Greenbridge Ltd (M J Oxford/ formerly Kestrel Wildlife Ltd) indicates that there is likely to be significant impact upon habitats as a result of development on this site.</p> <p>Whilst there were a number of representations in support of the site, no evidence was submitted to indicate how the impacts of development could be mitigated. Consequently it is recommended that the site is not allocated for development and deleted from Appendix D of the Local Plan (with a consequent reduction in numbers by 50 dwellings).</p> <p>The adjacent brownfield industrial site, currently allocated in the Adopted Torbay Local Plan (H1.21) would remain as a potential housing site.</p>
900169	AFC8	Maidencombe Residents Association	MM9, MM14 SDT1	Object to inclusion of Sladnor Park as a housing site (landscape, ecology, drainage/flooding, impact on village character, transport)	Developability of Sladnor Park, Maidencombe. The importance of greater horseshoe bat habitats is noted. Similarly the site is within a sensitive part of the undeveloped coastal landscape, and located some way from services. However the site has previously gained planning permission for a retirement village (P/2006/0747/MOA and P/2007/1410/MRM), which may have been implemented and, in any case, demonstrates that the site is developable and deliverable.
843591	AFC9	Devon CPRE (Carole Box)	MM1, MM3, MM14 SS1 etc SS2 SDB1	Object to levels of growth above 8,300 dwellings (migration rates, infrastructure, landscape and ecology constraints). Object to designation of land south of White Rock (MM3)- SofS's 1997 reasons for refusal are still relevant. Object to Churston Golf Club site (MM14)	Please see response to Paignton Neighbourhood Forum above. Objections to land South of White Rock are noted. Please see response below to Natural England's comments and more detailed assessment in the schedule of representations by Modification/Policy Number.
844172	AFC10	Collaton Defence League and Collaton St Mary Residents Association	MM1 Obj, etc. MM10 SS1 etc SDP3	Endorse Paignton Neighbourhood Forum's objections. Object to level of growth, extent of greenfield land take and lack of infrastructure delivery plan.	Objections are not directly related to the Modifications, but to the overall growth strategy and the identification of Collaton St Mary as a Future Growth Area. The Proposed Modifications have reduced the proposed number of dwellings at Collaton St Mary in

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					<p>response to the findings of the Collaton St Mary Masterplan. However more detailed assessment of greater horseshoe bat flightpaths, drainage etc will need to be undertaken as part of planning applications/ more detailed assessments building on the Masterplan.</p> <p>The forthcoming Planning Contributions Supplementary Planning Guidance will need to consider infrastructure priorities.</p>
830233	AFC11	Stoke Gabriel Parish Plan Group	MM3 SS2, SDB1	Object to allocation of White Rock. Impact on Yalberton Valley, AONB, Traffic, Duty to Cooperate matters with South Hams.	Objections to land South of White Rock are noted. Please see response below to Natural England's comments and more detailed assessment in the schedule of representations by Modification/Policy Number.
900130	AFC12	Watcombe Wanderers Football Club	MM9/MM14 SDT1	Object to identification of Steps Cross as a potential housing site, due to loss of recreational facility and shortage of pitches.	Steps Cross is identified in the Torbay Playing Pitch Strategy as being substandard. Discussions have taken place between Sport England and the Council's Residents' and Visitor Services. These have confirmed that the Playing Pitch Strategy would support tying in development of Steps Cross playing field with investment in the nearby King George V playing fields (East of Teignmouth Road, 250 metres from Steps Cross), to achieve an overall improvement in provision. On this basis development could meet the tests in NPPF paragraph 74.
Business Sector/Organisations/Social Enterprise Sector					
900132	B1	Watcombe Childrens Centre Nursery (Nik Salter)	MM9, MM14 SDT1	Object to Steps Cross: Impact on recreation, transportation, education.	See response above in relation to Sport England, Watcombe Wanderers FC. It is noted that the playing field is close to three schools, but is not part of the formal playing fields used by the schools.
847469	B2	South West HARP Planning Consortium	MM1 MM7 AM129 SS1, H2	Object to 10,000 dwelling figure- does not meet full objectively assessed need. SHMA should be renewed. Object to the change to affordable housing threshold being changed as an additional modification.	<p>The affordable housing threshold was raised in response to changes to the PPG. The Council's legal advice was that the Local Plan should comply with the PPG requirements on affordable housing. The Suggested Changes to the Local Plan (November 2014) noted that <i>"the government is considering introducing a minimum threshold for affordable housing of 10 dwellings. If this comes into effect the 3-10 dwelling threshold for affordable housing will drop away"</i>.</p> <p>On this basis it is not considered to be a Main</p>

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					<p>Modification.</p> <p>The calculation of full objectively assessed need has been examined in detail at the Examination Hearing and through written submissions.</p> <p>The Council accepts the need for affordable housing. Delivery is constrained by viability as well as environmental capacity. The overall level of growth is limited by Torbay's environmental capacity as noted above. This makes it impractical to increase housing numbers in order to achieve a greater level of affordable housing provision.</p>
Development Industry - Housing					
844154	HB1	Homebuilders Federation	<p>MM1 MM7 MM14</p> <p>AM129, AM135, AM104, AM144, AM155</p> <p>SS1 etc SDT1, SDP1, SDP1</p>	<p>Object to MM1: it should state at least 10,000 dwellings and set out how shortfall below FOAN can be met.</p> <p>Object that 5 year supply cannot be met (when taking backlog into account) which renders the Local Plan unsound. MM14- Object to inclusion of car parks- their delivery is uncertain</p> <p>Comments on AMs: There is a need to ensure that no additional burdens are placed on developers by the additional modifications and other revisions that may be made to bring into the Plan into line with PPG.</p>	<p>Five Year Supply issues The achievability of housing levels will be limited by Torbay's environmental constraints, as noted above and in the schedule of representations by Modification/Policy Number.</p> <p>Once an objectively assessed need figure has been finalized, the Council agrees that any shortfall will need to be met within five years (final paragraph of PPG 3-025). On the Council's assessment this would be between 13-20 dwellings based on the Plan Starting Point of 2012.(see separate schedule of Representations by Modification/ Policy number. The Council would be able to maintain a five year supply of housing on this basis.</p> <p>It is noted that the PPG 3-025 penultimate paragraph suggest that a long term view of local delivery is taken. As pointed out in Paignton Neighbourhood Plan's evidence, delivery between 2001-11 significantly exceeded population and household growth and counts as over delivery (PPG3-036)</p> <p>The Council agree that if full objectively assessed need cannot be met within Torbay, there will be a need to discuss with neighbouring authorities whether they are able to accommodate un-met need. However this will not arise before at least 2023 based on the stock of developable sites identified in the Local Plan and</p>

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					<p>SHLAA.</p> <p>Deliverability of Car Park Sites Car parks are identified within the pool of sites for designation within Neighbourhood Plans and will not be included within five year supply until their deliverability has been established, and it is clear that sufficient car parking can be retained. However they are likely to be sustainable brownfield sites in the built up area. As noted above, the Council is able to maintain a five year housing land supply based on existing commitments and developer interest in future growth area sites.</p> <p>Additional Burdens- see also schedule of Additional Modifications The Submission Plan has been subject to a whole plan viability testing study (PBA 2014). The bulk of the additional modifications are necessary to meet HRA requirements. The Council agree that additional viability testing will be needed if it wishes to make dwelling sizes mandatory.</p> <p>Viability will also be a critical consideration in the CIL Charging Schedule and Planning Contributions SPD.</p>
844351 (agent) 844178 (consultee)	HB2	Richmond Torquay (Jersey) Limited (PCL Planning on behalf of)	MM7 Sup MM17 SDT1	Support MM7 Support principle of allocation of Sladnor Park, Maidencombe, but could accommodate more than 25 dwellings without breaching environmental limits.	<p>Sladnor Park, Maidencombe The importance of greater horseshoe bat habitats and the landscape importance of the site are significant constraints.</p> <p>As noted above, the Council considers that development can be achieved without harm to greater horseshoe bats or the County Wildlife Site. Sensitive development may help to enhance the site's biodiversity value. However detailed site assessment will need to be carried out as part of any subsequent planning application, to establish the site's capacity, necessary biodiversity etc and mitigation measures. Without this information, the Council do not consider it would be appropriate to increase the assessed yield above 25 dwellings.</p>

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844351 (agent) 844349 (consultee)	HB3	Waddeton Park Limited (PCL Planning on behalf of).	MM1, MM3 MM5, MM7. MM11 Amend SS2.3, SDP3	Support increase in housing numbers to 10,000. This should be the minimum requirement. Request extension of Future Growth Area SS2.3/SDP3.4 to the west of area. (see application P2014/0983)	Waddeton Park Ltd's objection does not relate to a Modification but calls for an extension to the boundary of the Future Growth Area. The site is currently the subject of a planning application (P/2014/0983)). The Council do not object in principle to the extension of the Future Growth Area, with the important caveat that any proposal will need to make provision for biodiversity mitigation and landscaping. On this basis, development is unlikely to be acceptable on the entire Future Growth Area. This principle is already set out in Policy SS2 of the Local Plan.
844316 (agent) 844315 (consultee)	HB4	Taylor Wimpey (Origin 3 on behalf of)	MM1 Support MM3 MM5, MM10, MM11, MM12, MM14 SS2, SDP1 SDP3, SDB1	Support increase in housing numbers to 10,000 dwellings. Object that housing numbers have been reduced in Collaton St Mary (MM11/SDP3). Collaton St Mary is less constrained than sites in the south of Torbay, including White Rock. It is more deliverable than car park sites.	Collaton St Mary has been the subject of detailed Masterplanning. The Masterplan has assessed the landscape impact of development. It is noted that the strongest developer interest relates to the North of Totnes Road, which some objectors consider to be the more sensitive in landscape terms. Whilst detailed schemes may demonstrate higher numbers of dwellings are achievable without causing undue landscape or greater horseshoe bat/biodiversity impact; the Council has not received evidence to show how this could be achieved. On this basis it considers that the capacity identified in the Masterplan is the most justifiable figure, based on the available evidence. The Council does not consider it is appropriate to increase the housing requirement at Collaton St Mary simply because of sensitivities at land south of White Rock. Each site should be considered on its merits and the extent to which development impacts can be mitigated.
844198 (agent) 791437 (consultee)	HB5	Bloor Homes (South West) Ltd. (Boyer Planning on behalf of).	MM1 Sup/obj MM2 MM3 MM4, MM5, MM10, MM11, MM12, MM14	Support increase in housing numbers to 10,000 dwellings. But object that this figure is below FOAN. Object to reliance on car parks and windfalls. Need to make up for past undelivery by bringing forward development in Future Growth Areas.	See response to Home Builders Federation in relation to objectively assessed need and identification of car parks. See response above in relation to Taylor Wimpey with respect to capacity for growth at Collaton St Mary.

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			SS1, SS2, SDP3, SS8, NC1	<p>Object to reduction of housing numbers at Collaton St Mary. Bloor Homes' site at Collaton St Mary has capacity for 160 dwellings. Reducing numbers will harm viability.</p> <p>Object to designation of land south of White Rock: area has greater constraints than Collaton St Mary. Churston Golf Club site is "considered to have no capacity for housing development". Car parks cannot be relied on for housing land as delivery is uncertain, flooding and other constraints.</p> <p>Greater horseshoe bat mitigation should be required on a case by case basis and not all Future Growth Areas.</p>	<p>Land South of White Rock See discussion above and in separate Schedule of Representations by Modification/Policy Number on land south of White Rock.</p> <p>Developability of Churston Golf Club The Council concurs with Natural England's comments that the 1st and 18th hole site is itself relatively unconstrained, but the difficulty is in identifying a replacement clubhouse and 1st/18th hole site. The Council consider that this issue is not insurmountable in the medium term and it is therefore appropriate to retain the site as a site for identification by the Brixham Peninsula Neighbourhood Plan.</p> <p>The Modifications with regard to greater horseshoe bat mitigation have been the subject of extensive negotiations with Natural England. In any event Collaton St Mary has been identified as within the greater horseshoe bat flyway, and the need to maintain and enhance these has been identified by Natural England and the Council's HRA.</p>
844863 (agent) 844862 (consultee)	HB6	Abacus (Stride Treglown for).	MM1,MM2, MM3, MM8 Support MM3, AM16 and AM19: minor clarification. SS2, SDB1	<p>Support increase in housing numbers in MM1.</p> <p>Support designation of land South of White Rock as a Future Growth Area Detailed Land Promotion Report submitted in support of the proposal, setting out landscape, ecology etc matters. Suggests that 328 dwellings and 3-3,500 sq m of employment/retail space can be achieved.</p>	<p>Note that this site is slightly smaller than the Future Growth Area and is similar to the SHLAA site T756b.</p> <p>Land south of White Rock is likely to be the only strategically significant site with capacity to significantly increase the level of housing above the 9,240 identified in the Submission Local Plan.</p> <p>The previous Secretary of State's decision (from 1997) is noted. In addition, paragraphs 115-116 of the NPPF Indicate that great weight should be given to conserving landscape and scenic beauty in AONBs.</p> <p>Abacus has provided a Land Promotion Study setting out landscape and biodiversity evidence in support of development on this site. It is noted that that the site they have commented on at the Proposed Modifications stage is smaller than the site they previously promoted (corresponding to SHLAA site</p>

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					<p>T756b, but excluding T739 to the south (north of Galmpton). This area is sets out around 328 dwellings (as opposed to 460 in MM3)</p> <p>The Land Promotion Study contains a detailed landscape assessment (by Stride Treglown) and bat survey (Ecosulis). However the Council's HRA advice on greater horseshoe bats (from Greenbridge Ltd /M J Oxford/ Kestrel Wildlife) is that further assessment beyond the Ecosulis Bat Activity Survey is needed to establish whether there is a likely significant effect on the SAC.</p> <p>No evidence has (currently) been put forward on the loss of agricultural land/ soil quality, which is also part of Natural England's objection.</p> <p>In the Council's view, the promoted northern area's potential would need to be tested further before the site could be allocated. It may be suitable for longer term allocations when additional assessments have been carried out. However objectors to the allocation have raised legitimate matters that would override the presumption in favour of sustainable development.</p> <p>No evidence has been put forward about the southern part of the site (10 hectares corresponding to SHLAA site T739). Some of the representations raised concerns about the coalescence of Galmpton with development on the Brixham Road. Deleting the southern site from the Future Growth Area would mitigate this impact.</p>
Private Individuals – Torquay (excluding Steps Cross)					
638322	TI1	Nigel Davies	MM9, MM14 Obj	Object to Sladnor Park. Remoteness, transport, lack of schools, environmental impact- site used as landfill in the past.	See response above with regard to Sladnor Park's biodiversity. The Council agree that it is not particularly close to services. However Teignmouth Road is served by the no. 11 bus service and the site has recently had planning permission. On this basis it is considered suitable for development subject to wildlife and landscape matters being satisfactorily addressed.
845042	TI2	Anthony Garlick	MM9 MM14	Redstones, Cockington should be a housing site, as it is less sensitive than other alternative sites.	The issue has been considered in the Council's responses to the proposed Submission Local Plan. Redstones is the subject of enforcement action. In any

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						event the site does not have capacity for 6+ dwellings and any development would be treated as a small windfall.
900074	TI3	Kathy	Uglow (K Luxton)	MM9/MM14	Object to inclusion of Chilcote Close- Loss of privacy, trees, Conservation area, parking and right of way issues.	It is considered that the issues identified can be overcome through design and conditions protecting trees and residents' rights of way. The site is within the Pool of sites from which Torquay Neighbourhood Forum will need to identify development land. Maintenance of sufficient parking, tree issues and rights of way will need to be addressed before development can commence.
Private Individuals –Steps Cross, Torquay						
Online petition with 75 signatures and 146 individual email/letters of objections to the designation of Steps Cross as a potential housing site (MM9/MM14; SDT1 and SDT 3)				Reasons for objection include the impact the proposed development will have on the landscape, severe impact on traffic in the neighbourhood which is already overcrowded. Impact on dangerous junctions. Loss of recreational amenities, both formal playing field and informal recreation area. Proximity of schools in the area . Impact on setting of Brunel Park. Lack of facilities (schools are over stretched). Impact on deprivation in the Watcombe area. It is argued that more suitable brownfield opportunities can be found.		<p>Steps Cross, Watcombe</p> <p>The high level of objections is noted. The proposal would result in the loss of an informal recreation area. However the playing pitch is identified in the Torbay Playing Pitch Strategy as being substandard. Discussions have taken place between Sport England and the Council's Residents' and Visitor Services. These have confirmed that the Playing Pitch Strategy would support tying in development of Steps Cross playing field with investment in the nearby King George V playing fields (East of Teignmouth Road, 250 metres from Steps Cross), to achieve an overall improvement in provision. On this basis development could meet the tests in NPPF paragraph 74.</p> <p>Objections have been raised on the grounds of congestion, and the busy junction with Teignmouth Road. However, it is considered that impacts could be satisfactorily ameliorated.</p> <p>The site is identified in Appendix D of the Local Plan as a site for allocation in Neighbourhood Plans, as noted above.</p>
899378	SC1	Nicola	Hall	MM9/MM14	Online petition objecting to Steps Cross submitted via Change.Org	See response above.
898918	SC2	M	Adams	MM9/MM14		See response above.
828928	SC3	Mr P D	Aggett	MM9/MM14		See response above.
898929	SC4	Miss Lee	Allen	MM9/MM14		See response above.
898930	SC5	Mr & Mrs G H (letter)	Antieul	MM9/MM14		See response above.

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898931	SC6	David & Jacqueline	Appleby	MM9/MM14		See response above.
898932	SC7	Peter	Archer	MM9/MM14		See response above.
898933	SC8	Craig	Axford	MM9/MM14		See response above.
898934	SC9	Salt	Barnes	MM9/MM14		See response above.
898712	SC10	Suzanne	Beasley	MM9/MM14		See response above.
898940	SC11	Kevin	Begley	MM9/MM14		See response above.
898942	SC12	W E & J	Bell	MM9/MM14		See response above.
898944	SC13	Marilyn	Bennion	MM9/MM14		See response above.
898946	SC14	Carole	Benton	MM9/MM14		See response above.
898948	SC15	Janet	Bestwick	MM9/MM14		See response above.
898950	SC16	Shaun, Mandy Ian & Laura	Biddle	MM9/MM14		See response above.
898951	SC17	Mr C E (letter)	Brokenshi re	MM9/MM14		See response above.
898952	SC18	Chris & Dave	Bullen	MM9/MM14		See response above.
898956	SC19	David & Debbie	Cadwalla der	MM9/MM14		See response above.
898957	SC20	Joanna	Cannings	MM9/MM14		See response above.
899021	SC21	Samantha	Chammin gs	MM9/MM14		See response above.
899025	SC22	E M & R G (letter)	Cole	MM9/MM14		See response above.
899380	SC23	Colin	Cook	MM9/MM14		See response above.
899029	SC24	Debbie	Cooper	MM9/MM14		See response above.
899123	SC25	Karen	Cousins	MM9/MM14		See response above.
899032	SC26	Mrs P M & Mr B L	Cripps	MM9/MM14		See response above.
899034	SC27	Andrew	Critchlow	MM9/MM14		See response above.
899036	SC28	Chelsea	Crofts (?)	MM9/MM14		See response above.
899040	SC29	Cllrs. Steve & Roger	Darling & Stringer	MM9/MM14		See response above.
899225	SC30	Richard & Andrea	Davies	MM9/MM14		See response above.
899044	SC31	Robert	Day	MM9/MM14		See response above.
899045	SC32	Yemaya	Design	MM9/MM14		See response above.
899046	SC33	Mr & Mrs L (letter)	Dodson	MM9/MM14		See response above.
899049	SC34	William & Susan	Edmund	MM9/MM14		See response above.

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899051	SC35	Glynis	Elliott	MM9/MM14		See response above.
899056	SC36	Mr D	Ellis	MM9/MM14		See response above.
899058	SC37	Mrs Jackie	Fauset	MM9/MM14		See response above.
899062	SC38	Mrs Margaret	Firth	MM9/MM14		See response above.
899384	SC39	Mr G	Fletcher- Frost	MM9/MM14		See response above.
899065	SC40	Peter	Foxon	MM9/MM14		See response above.
899063	SC41	Debbie & Paul	Freer	MM9/MM14		See response above.
899066	SC42	Greg	Frost	MM9/MM14		See response above.
899068	SC43	Tim	Gawn	MM9/MM14		See response above.
899069	SC44	Stephanie	Glasper	MM9/MM14		See response above.
899390	SC45	Peter John	Godber	MM9/MM14		See response above.
899071	SC46	Mrs Barbara	Hanford	MM9/MM14		See response above.
899073	SC47	S P & Ryan (letter)	Harris	MM9/MM14		See response above.
899074	SC48	Mr & Mrs C M (letter)	Harris	MM9/MM14		See response above.
899076	SC49	Katrina	Harris- Byrne	MM9/MM14		See response above.
899077	SC50	Pete	Harris- Byrne	MM9/MM14		See response above.
899078	SC51	Martin	Hayman	MM9/MM14		See response above.
899080	SC52	Sarah	Haywood	MM9/MM14		See response above.
899081	SC53	Maria & Adrian	Head	MM9/MM14		See response above.
899085	SC54	Paul	Hellyer +6 others	MM9/MM14		See response above.
899088	SC55	Donald	Hesketh	MM9/MM14		See response above.
899089	SC56	Mr Robert	Hibell	MM9/MM14		See response above.
899090	SC57	Ms J	Hickley	MM9/MM14		See response above.
899091	SC58	John	Hockin	MM9/MM14		See response above.
899092	SC59	Ann	Horner	MM9/MM14		See response above.
899093	SC60	James	Horner	MM9/MM14		See response above.
899095	SC61	M & H	Humphrie s	MM9/MM14		See response above.
899094	SC62	Mr Robin	Hyde	MM9/MM14		See response above.
899099	SC63	Audrey & David (letter)	Jenks	MM9/MM14		See response above.

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899101	SC64	Paul	Keen	MM9/MM14		See response above.
899102	SC65	Mrs B (letter)	King	MM9/MM14		See response above.
899106	SC66	Robin & Sylvia	Lander	MM9/MM14		See response above.
899107	SC67	Mrs Annette	Lang	MM9/MM14		See response above.
899111	SC68	Jane	Lang	MM9/MM14		See response above.
899114	SC69	Joanne	Ledger	MM9/MM14		See response above.
899116	SC70	Sally	Lemar	MM9/MM14		See response above.
899117	SC71	David	Lemar	MM9/MM14		See response above.
899118	SC72	Gilllian	Lemar Collings	MM9/MM14		See response above.
899120	SC73	Miss Karina (letter)	Lidbury	MM9/MM14		See response above.
898715	SC74	Mrs M (letter)	Lidbury	MM9/MM14		See response above.
899121	SC75	David & Barbara	Lightbown	MM9/MM14		See response above.
899125	SC76	Nancy (letter)	Lucas	MM9/MM14		See response above.
899394	SC77	Emma	M			See response above.
899396	SC78	Daniel	Mallandai ne	MM9/MM14		See response above.
899136	SC79	Tina	Maunder	MM9/MM14		See response above.
899137	SC80	Patricia & Piers	McBride	MM9/MM14		See response above.
899135	SC81	Gabriele Boari (?) & Andrea (Letter)	Miles	MM9/MM14		See response above.
899139	SC82	Caroline & Huw	Milner	MM9/MM14		See response above.
899141	SC83	Venna & John	Milsom	MM9/MM14		See response above.
899142	SC84	Mr T (letter)	Moore	MM9/MM14		See response above.
899399	SC85	Adam	Morton	MM9/MM14		See response above.
899146	SC86	Paul & Angela	Newman	MM9/MM14		See response above.
829508	SC87	David	Newton	MM9/MM14		See response above.
899147	SC88	Lesley	Newton	MM9/MM14		See response above.
899148	SC89	J W	Nicholls	MM9/MM14		See response above.

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899150	SC90	Mrs Michelle	Noble	MM9/MM14		See response above.
899151	SC91	Tony	Noble			See response above.
899155	SC92	Mike & Val	O'Connell	MM9/MM14		See response above.
899152	SC93	Derek F (letter)	Oatley	MM9/MM14		See response above.
899156	SC94	Dee	Parnell	MM9/MM14		See response above.
899160	SC95	Jim	Pearson	MM9/MM14		See response above.
899157	SC96	Sandra	Pearson	MM9/MM14		See response above.
899161	SC97	R V	Pells	MM9/MM14		See response above.
899164	SC98	Mrs M	Piggott	MM9/MM14		See response above.
899167	SC99	Anita	Piller	MM9/MM14		See response above.
899169	SC100	Brian (letter)	Piller	MM9/MM14		See response above.
899172	SC101	Nigel	Piller	MM9/MM14		See response above.
899177	SC102	Elaine Ann	Poole	MM9/MM14		See response above.
899174	SC103	Jennifer	Powley	MM9/MM14		See response above.
899401	SC104	Mrs Jo	Preston	MM9/MM14		See response above.
899181	SC105	Anna	Pryor	MM9/MM14		See response above.
899187	SC106	S & R (letter)	Rankin	MM9/MM14		See response above.
899190	SC107	Michael	Read & Mrs H Burdon	MM9/MM14		See response above.
899196	SC108	Mr & Mrs E	Rixon	MM9/MM14		See response above.
899200	SC109	William & Janine	Roberts	MM9/MM14		See response above.
899205	SC110	J B	Rogers	MM9/MM14		See response above.
899212	SC111	Mrs Elizabeth (letter)	Roper			See response above.
899218	SC112	Mrs Wendy	Salter	MM9/MM14		See response above.
899220	SC113	Amie	Schofield	MM9/MM14		See response above.
899231	SC114	P E & K J (letter)	Sercombe	MM9/MM14		See response above.
899234	SC115	Marie	Shepherd	MM9/MM14		See response above.
899237	SC116	Greta	Sheppard	MM9/MM14		See response above.
899240	SC117	Mike	Smart	MM9/MM14		See response above.
899242	SC118	George & Jeanne	Stetson	MM9/MM14		See response above.
899248	SC119	Gary	Stevens	MM9/MM14		See response above.
899252	SC120	Carol	Stockton	MM9/MM14		See response above.

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899259	SC121	Mark	Stockton	MM9/MM14		See response above.
899269	SC122	Tina	Stockton	MM9/MM14		See response above.
899263	SC123	Judith	Sumner	MM9/MM14		See response above.
899271	SC124	Stuart & Carol (letter)	Tallamy	MM9/MM14		See response above.
899273	SC125	Raymond J	Taylor	MM9/MM14		See response above.
899274	SC126	Margaret	Templeman	MM9/MM14		See response above.
899405	SC127	Adam	Towning	MM9/MM14		See response above.
899275	SC128	Derek	Urban	MM9/MM14		See response above.
899276	SC129	Jenny & Arthur	Vowden	MM9/MM14		See response above.
899317	SC130	B (?)	Ward or Weed (?)	MM9/MM14		See response above.
899407	SC131	Mrs M	Warrilow	MM9/MM14		See response above.
899408	SC132	Neil	Warrilow	MM9/MM14		See response above.
899328	SC133	Nicolette	Wells	MM9/MM14		See response above.
899320	SC134	Mrs H	West	MM9/MM14		See response above.
899323	SC135	Julie	Weymouth	MM9/MM14		See response above.
899332	SC136	Mrs Sally	White	MM9/MM14		See response above.
899335	SC137	Mr P C (Letter)	Whittam	MM9/MM14		See response above.
899165	SC138	Mr & Mrs	Willcox & Mr & Mrs Pike	MM9/MM14		See response above.
899336	SC139	D	Windsor	MM9/MM14		See response above.
899337	SC140	Mr Terry	Womsley	MM9/MM14		See response above.
899338	SC141	Mr Christopher	Woodman	MM9/MM14		See response above.
899339	SC142	Robert	Woolcott	MM9/MM14		See response above.
899340	SC143	Dave	Woolway	MM9/MM14		See response above.
899343	SC144	Christopher	Yeoman	MM9/MM14		See response above.
899345	SC145	Susan	Yeoman	MM9/MM14		See response above.
Private Individuals – Paignton- other than White Rock						
417506	PI1	Adrian	Gee	MM10 MM11	Object to development at Collaton St Mary. Reduction in numbers does not eliminate landscape, etc impact and loss of village character.	See above. This does not directly relate to Modifications to the Plan. The Modifications have reduced the number of dwellings proposed in Collaton St Mary by around 376 dwellings in accordance with the findings of the Masterplan.

Representations on Main Modifications * Objections unless otherwise stated						
ID	File No.	Person /Organisation Consultee	Modification/ Policy No.	Summary of Representations Made	LPA Response	
Private Individuals- White Rock						
				Objections to White Rock Future Growth Area – landscape, ecology, tourism, transport, infrastructure, local facilities. Loss of farmland. Loss of urban wedge protecting Galmpton. The Secretary of State has previously rejected employment development on the site. Allocating the site is contrary to localism.	See detailed response above in relation to Abacus and Natural England.	
899168	WR1	Angela	Ainscough	MM3	Object	See above.
899170	WR2	Wendy (letter)	Arrowsmith	MM3	Object	See above.
899171	WR3	Jennifer	Ashington	MM3	Object	See above.
899173	WR4	Deborah	Avery	MM3	Object	See above.
899175	WR5	Mr D J (letter)	Barr	MM3	Object	See above.
899178	WR6	Jackie	Baxter	MM3	Object	See above.
899180	WR7	Rick (letter)	Behenna			See above.
899189	WR8	Mrs R G	Bell	MM3	Object	See above.
899191	WR9	C W (?) (letter)	Berryman	MM3	Object	See above.
899197	WR10	Frank	Bowden	MM2	Object	See above.
429431	WR11	Dr Helen	Boyles	MM3 & MM1	Object	See above.
357855	WR12	Richard	Boyles	MM3	Object	See above.
899202	WR13	Niall & Ina	Brooks	MM3	Object	See above.
899204	WR14	Dr R & Mrs P	Brown	MM3	Object	See above.
899206	WR15	Mrs Janet	Bull	MM3	Object	See above.
899208	WR16	H Burke (Holly Simpson)	Burke	MM3	Object	See above.
899213	WR17	Robert & Yvonne	Childs	MM3	Object	See above.
899214	WR18	Anna	Chrystie	MM3	Object	See above.
899215	WR19	Emily	Chrystie	MM3	Object	See above.
899216	WR20	Peter	Chrystie	MM3	Object	See above.
829357	WR21	Mr & Mrs J (letter)	Collinge	MM3	Object	See above.
899217	WR22	G W (letter)	Colman	MM3	Object	See above.
899219	WR23	Sean	Congdon	MM3	Object	See above.

Representations on Main Modifications * Objections unless otherwise stated						
ID	File No.	Person /Organisation Consultee		Modification/ Policy No.	Summary of Representations Made	LPA Response
899222	WR24	Robert J	Davies	MM3	Object	See above.
899227	WR25	Mrs D R & Mr R F	Duggan	MM3	Object	See above.
899228	WR26	David	Edey	MM3	Object	See above.
899230	WR27	Adrian	Evers	MM3	Object	See above.
899233	WR28	Jeremy	Fatz	MM3	Object	See above.
899235	WR29	S (letter)	Fleming	MM3	Object	See above.
899236	WR30	Rebecca	Ford- Bartlett	MM3	Object	See above.
899239	WR31	Dr G J	Gardner	MM3	Object	See above.
899241	WR32	J	Gardner	MM3	Object	See above.
899244	WR33	Helen & Alan	Gilliland	MM3	Object	See above.
899247	WR34	Mrs M (letter)	Goldsmith	MM3	Object	See above.
899249	WR35	Dr Jenny	Graham	MM3	Object	See above.
899253	WR36	Mr Edward (letter)	Hewitt	MM3	Object	See above.
899254	WR37	Jon	Lavin	MM3	Object	See above.
899256	WR38	Kay	Lavin	MM3	Object	See above.
899257	WR39	Ronald Law & Associates (retired) (letter)	Law	MM3	Object	See above.
899258	WR40	Jenny	Lee	MM3	Object	See above.
899260	WR41	Vanessa	Lewis	MM3	Object	See above.
899262	WR42	Andrew	Loader			See above.
829682	WR43	Lovejoy	Leaf	MM1/MM3	Object. Also object to growth levels (MM1) and duty to cooperate issues.	See above.
899450	WR44	Mrs Mavis	Makepea ce	MM3	Object	See above.
899456	WR45	Mrs Margaret	Manion	MM3	Object	See above.
899457	WR46	Karen	Marshall	MM3	Object	See above.
500150	WR47	Mrs Joan	Mazumda r	MM3/ MM1	Object	See above.
899947	WR48	Clare & Patrick	McMahon	MM3	Object	See above.
899948	WR49	C D (?)	Medley	MM3	Object	See above.

Representations on Main Modifications * Objections unless otherwise stated						
ID	File No.	Person /Organisation Consultee		Modification/ Policy No.	Summary of Representations Made	LPA Response
		(letter)				
899949	WR50	Stuart	Miller	MM3	Object	See above.
899951	WR51	Susan	Miller	MM3	Object	See above.
899952	WR52	Mrs J (letter)	Mills	MM3	Object	See above.
899955	WR53	Mr S	Munns	MM3	Object	See above.
899956	WR54	Martin	Murray	MM3	Object	See above.
899960	WR55	Mrs J (?) (letter)	Nicholaus	MM3	Object	See above.
899962	WR56	Phyllis	Norman	MM3	Object	See above.
899966	WR57	Sheila	O'Connor	MM3	Object	See above.
899972	WR58	Alistair	Pascoe	MM3	Object	See above.
899973	WR59	Joyce	Peach	MM3	Object	See above.
899975	WR60	M G	Peach	MM3	Object	See above.
899976	WR61	Mrs Rachel	Peach- Murray	MM3	Object	See above.
899977	WR62	S (letter)	Peacock	MM3	Object	See above.
899978	WR63	Deborah	Perret	MM3	Object	See above.
899979	WR64	Mrs J A (letter)	Pidgeon	MM3	Object	See above.
899980	WR65	Mr Mark (letter)	Pidgeon	MM3	Object	See above.
899983	WR66	Mr K S	Popham	MM3	Object	See above.
899985	WR67	Dr Martin	Ridge	MM3	Object	See above.
899990	WR68	Nikki	Rogers	MM3	Object	See above.
899997	WR69	Janet & Paul	Savin	MM3	Object	See above.
899998	WR70	Diana & John (letter)	Scotney	MM3	Object	See above.
900000	WR71	Duncan	Searle	MM3	Object	See above.
900007	WR72	Jeff	Searle	MM3	Object	See above.
900008	WR73	Joanne	Seymour	MM3	Object	See above.
900009	WR74	John & Sara	Seymour	MM3	Object	See above.
429416	WR75	S W	Sherren	MM3 SS2 SDP3	Object to land at White Rock. Urban sprawl, landscape, ecology, transport. Goes against localism. Precedent for resisting development has been set by Churston Golf Course appeal.	See above.
900012	WR76	Emma	Shivaana nd	MM3	Object	See above.
900013	WR77	Clair	Stanley	MM3	Object	See above.

Representations on Main Modifications * Objections unless otherwise stated						
ID	File No.	Person /Organisation Consultee		Modification/ Policy No.	Summary of Representations Made	LPA Response
900017	WR78	Susan	Swan	MM3	Object	See above.
900020	WR79	John & Glenda	Tapp	MM3	Object	See above.
900023	WR80	T V (letter)	Tattersall	MM3	Object	See above.
900025	WR81	Judith	Thomas	MM3	Object	See above.
900026	WR82	Mrs Jacquelyn	Waldron	MM3	Object	See above.
900028	WR83	Rupert	Walker	MM3	Object	See above.
900030	WR84	S (letter)	Ware	MM3	Object	See above.
358268	WR85	Michael	Webster	MM3	Object	See above.
900036	WR86	Scott	Williams	MM3	Object	See above.
900038	WR87	Linda	Wilson	MM3	Object	See above.
900041	WR88	E A (letter)	Witterley	MM9/MM14		See above.
900047	WR89	K L (letter)	Wright	MM3	Object	See above.
900049	WR90	Ian	Young			See above.
900050	WR91	Illegible, 17 Manor Vale Rd, Galmpton (letter)	X Unknown	MM3	Object	See above.
Private Individuals - Brixham						
829357	BI1	Mr & Mrs J	Collinge	MM14	Object to development on car parks unless alternative provision is made to retain car parking e.g. underground or making better use of space.	The development of car park sites in Appendix D of the Local Plan states that they are subject to retention of sufficient car parking. Underground parking is one solution, although may be expensive and run into flooding problems. In Brixham this only relates to Shoalstone Overflow car park (although Oxen Cove and Freshwater car parks, and the Town centre are identified in SDB2 Table 5.15 and are not the subject of proposed Modifications).
892197	BI2	Cherry	Hosking	MM14 Sup	Support the inclusion of land at St Marys campsite. Would meet housing needs and would complement the adjacent brownfield site.	Support for St Marys Campsite (and lack of objection from residents) is noted. However, the site is subject to significant concerns from Natural England and other bodies in relation to greater horseshoe bat issues. In the absence of evidence that these could be mitigated, it is recommended that the Campsite should be removed from the pool of sites in Appendix D of the Local Plan.
900064	BI3	William & Jenefer	Hosking		Support the inclusion of land at St Marys campsite. Would meet housing needs and would complement the adjacent brownfield	See above.

Representations on Main Modifications * Objections unless otherwise stated						
ID	File No.	Person /Organisation Consultee		Modification/ Policy No.	Summary of Representations Made	LPA Response
					site.	
900066	BI4	Edwina	Scarlett	MM14 Sup	Support the inclusion of land at St Marys campsite. Would meet housing needs and would complement the adjacent brownfield site.	See above
900067	BI5	Lilla	To	MM14 Sup	Support the inclusion of land at St Marys campsite. Would meet housing needs and would complement the adjacent brownfield site.	See above
900093	BI6	Ian	Watson	MM1 MM14 Sup	Support inclusion of St Marys Campsite, as it is adjacent to brownfield land, not in agricultural use and is not intrusive in the landscape.	See above
366378	BI7	Mr Brian	Harland	MM1	Growth rate in MM1 is too high and will harm Torbay's environment and viability as a tourism setting.	See above