

Application Number

P/2018/1086

Site AddressCorbyn Head Hotel
Torbay Road
Torquay
TQ2 6RG**Case Officer**

Mr Robert Brigden

Ward

Cockington with Chelston

Executive Summary/Key Outcomes

The proposed development would result in the demolition of an existing 45-guestroom hotel, and the construction of a new, purpose-built 152-guestroom hotel within the Core Tourism Investment Area. The proposal would include a roof-top bar, restaurant, public function rooms, spa facilities, and 101 spaces of car parking. The proposal would involve changes to the site's access arrangements, with one of the two existing access points being closed off and replaced by a safer alternative.

It is considered that the form, layout and design of the proposed hotel building would make appropriate use of the site's size and location close to Torquay's seafront and tourism facilities within the Core Tourism Investment Area, allowing for an economically viable scheme. Subject to the use of appropriate conditions to secure suitable materials and landscaping, it is considered that the proposal would result in a high quality addition and visual enhancement at what is a prominent site within the Bay. The provision of modern accommodation and associated leisure facilities has the potential to improve Torquay's attractiveness as a visitor destination. The proposal would bring economic benefits and, in the absence of any unacceptable harm in the other material respects, the proposal is recommended for approval, subject to the attached conditions and the completion of a legal agreement.

Reason for Referral to Planning Committee

The application has been referred to Planning Committee as it proposes Major development, and due to the number of objections that have been received.

Recommendation

That planning permission be granted subject to the completion of a legal agreement to secure financial contributions towards sustainable transport and local parking restrictions; and compliance with the conditions detailed at the end of this report. The final drafting and addition of conditions, along with the negotiation and completion of the legal agreement to be delegated to the Assistant

Director for Planning and Transport.

Site Details

The site is a broadly rectangular area of land measuring around 3300sqm in area, comprising land occupied by the Corbyn Head Hotel, and situated along the western side of Torbay Road in Torquay. The site is located approximately 1.2 miles (2km) to the south-west of Torquay town centre; 1.9 mile (3km) to the north-east of Paignton town centre; half a mile (800m, or a 10 minute walk) from Torquay railway station; and 0.8 miles (1.3km) from the Riviera International Centre and Abbey Sands development (formerly Palm Court). The site is located within the Core Tourism Investment Area and within Flood Zones 2 and 3.

The site's south-eastern boundary runs alongside Torbay Road; the northern end of the site adjoins Livermead Hill; the north-western boundary runs alongside the railway; whilst the southern end of the site lies adjacent to the Corbyn Apartments, which are in use as holiday lets and dwellings. Ground levels generally rise up steeply to the west beyond the railway line and behind the existing hotel.

The existing building is a standalone structure, which is two to three storeys in height and is set within a curtilage area mostly comprised of a car park. The building fronts onto Torbay Road, and the site has two vehicular access points onto the public highway.

The locality is characterised by a range of building types including hotel buildings, apartment blocks, and houses. The neighbouring Corbyn Apartments is a four storey building with a mansard roof; to the west, and located on the hillside beyond the railway line, is the Cromartie Point Flats building, which is four storeys in height, and there are various other, similarly sized apartment buildings around the same location, off Livermead Hill. The three-storey Livermead Cliff Hotel is located on lower ground to the south-east.

The railway line, which runs alongside the site is classed as a County Wildlife Site.

Detailed Proposals

The application proposes the demolition of the existing, 45-guestroom hotel, and its replacement with a new, purpose-built 152-guestroom hotel with associated leisure facilities, including a spa, roof-top bar, and a restaurant, which would be open to the public. Sandstone walls and landscaping would be introduced along the road frontage. An outdoor terrace area would be created at ground-floor level to the front of the building and at the northern end of the site, with pedestrian access to the public highway. An outdoor terrace area would also be provided at the fourth-floor level, at the northern end of the building, in association with the roof-top bar.

The proposed hotel would be of a modern design, incorporating a mix of glazing, white brick, black/blue brick, zinc cladding, and coloured panels across a horizontally patterned fenestration. The building would be up to 6 storeys tall at its highest point above ground level. The proposal would range from four storeys at its southern end, to six storeys in height at its northern end, above ground level, however, a sub-surface car park would also be provided at the building's southern end. The building would measure between approximately 15m (around 23m AOD) in height from the road level at the southern end of the building, and 21m (around 29m AOD) from road level at the northern end of the building. This compares to around 12m (around 20m AOD) in relation to the existing building. The proposed building would be tallest at its northern end and would step down towards its southern end. The footprint of the building would measure approximately 104m in length, and would have an average depth of around 17m. The footprint of the building would measure 1657sqm, which compares to 1089sqm in relation to the existing building.

The proposed building would provide 9,182sqm of accommodation, most of which would be given over to the guestrooms and associated elements, along with the car parking areas. The following would also be included: roof-top bar (218sqm), roof-top terrace (116sqm), restaurant and kitchen (369sqm), ground-floor terrace (196sqm), and spa-related facilities (123sqm). The proposed guestrooms typically measure around 24.5sqm in area, although there are larger, 'accessible' rooms approximately 30sqm in area.

The seven levels would comprise the following elements:

- A lower, under-croft car park at the southern end of the building, which would be accessed by a ramp. A small basement containing plant and a tank would sit just below the level of the under-croft car park.
- The lower ground-floor, comprising two areas of undercover car parking, along with a reception, staff facilities, and other services. The reception would be accessed from an area of outdoor parking, to and from which access to the public highway would be taken.
- The ground-floor level would comprise guest rooms at the southern end of the building, and a lounge area, kitchen, eating and drinking facilities at the northern end, which would have access onto the outdoor terrace, located above part of the lower ground-floor. A delivery reception area, accessed from Livermead Hill, would also be located at this level.
- The first, second, and third floors would mostly contain guest bedrooms, along with some associated facilities. The third and fourth floors would see the introduction of flat roofed areas at the southern end of the building.
- The fourth floor, which would mostly be located along the northern half of the building would comprise a spa, roof-top bar, outdoor terrace, other hotel-related services, and plant.

A new vehicular exit point would be created on to Torbay Road. The more northern

of the two existing access points would be closed off and stopped up. The existing, more southern, access would be retained and widened for use as an entrance to the site. The proposal would include 101 car parking spaces in total, equating to 2 spaces per 3 guestrooms, along with a temporary coach drop-off area capable of accommodating two coaches. A loading bay for deliveries would be provided along Livermead Hill, with access into the northern end of the building at the ground-floor level. Improved pedestrian access along Torbay Road would also be provided. The development would also include the introduction of new boundary treatment and landscaping features.

The proposal had originally been for a 175-bed hotel, however, revised plans were received in February, reducing the height of the building by one storey (approximately 3m), lowering the area of the roof to be occupied by plant, and increasing the number of parking spaces from 94 to 101, whilst the number of guestrooms has been reduced by 23.

Policy Context

Section 38(6) of the Planning and Compulsory Purchase Act 2004 places a duty on local planning authorities to determine proposals in accordance with the development plan unless material considerations indicate otherwise. The following development plan policies and material considerations are relevant to this application:

Development Plan

- The Adopted Torbay Local Plan 2012-2030 ("The Local Plan")
- Torquay Neighbourhood Plan

Material Considerations

- National Planning Policy Framework (NPPF)
- Planning Policy Guidance (PPG)
- Published standing Advice
- Planning matters relevant to the case under consideration, including the following advice and representations, planning history, and other matters referred to in this report.

Summary of Consultation Responses

Torquay Neighbourhood Plan Forum: Objects to the proposal on the following grounds (full letter provided at Appendix A):

- The proposal is too tall and not in keeping with the prevailing building heights;
- The proposal is significantly larger than the existing building;

- The proposal is contrary to Policy DE4 of the Local Plan and Policy TH8 of the Neighbourhood Plan;
- The proposal will have a harmful visual effect;
- It will block local and long views;
- The socio economic benefits are limited;
- Inadequate parking and access arrangements;
- Shortcomings in the submitted transport assessment;
- Harm to neighbouring amenity in terms of their outlook and privacy;
- The proposal may need to be assessed for compliance with Marine Management Organisation Policies.

South West Water: No objections provided foul flows only are connected to the public sewer and all surface water discharged either to the Sea or culverted watercourse to the south of the site.

Environment Agency: No objections.

Network Rail: No objections; conditions and informatives requested.

Police Designing-Out Crime Officer: *The increase in parking provision for the proposal is noted and supported but unfortunately this has not fully alleviated previous concerns raised, especially given the lack of alternative 'off-site' parking. It is appreciated that the Highways Authority will be fully consulted but it is respectfully requested that the proposed parking provision for the development is considered sufficient when balanced against the schedule of accommodation; the lack of alternative off-site parking options and the requirements of Policy TA3, to do all that is reasonable in preventing the potential for vehicle related complaints and issues as a result of inconsiderate and/or obstructive parking, damage to vehicles and property, all of which can easily introduce a source of conflict for the local neighbourhood.*

The ramifications of failing to factor in sufficient parking provision for new development are not always appreciated until full occupancy, by which time it is likely to be too late to remedy.

Otherwise no objections, subject to the use of a condition to secure a scheme of measures to design-out crime.

Natural England: No objections.

Habitats Regulations Assessment Advisor: Considering the proposed mitigation measures, there would be no adverse effect on the Integrity of the Lyme Bay and Torbay Marine Special Area of Conservation, either alone or in combination with other proposals or projects.

Structural Engineer: No objections; condition recommended seeking measures

to prevent damage to the highway along Livermead Hill during demolition and construction works.

Highways: No objections; see Strategic Transport comments.

Strategic Transport: No objections; planning obligations and conditions recommended (see Section 7 below).

Community Safety: No objections; conditions requested to secure details of and/or control kitchen extractor equipment and roof-top plant, including noise emissions; controls in relation to the use of the roof-top bar and terrace; and a demolition and construction management plan.

Arboricultural Officer: No objections subject to the use of a condition to secure a detailed landscaping scheme.

Drainage: Revised information is being considered by the Council's Drainage Engineer; an update will be provided to Members at the Development Management Committee.

Torbay Development Agency: Application is supported; the proposal would bring economic benefits to Torbay.

Design Review Panel:

05.04.2018

The long thin site has a very fine prospect (outlook) to the front and the railway line to the rear – this contrast ought to find inflection in the building design.

The scale of the building in relation to local context seems to be appropriate. In our site visit, we also anticipated the impact of the building when viewed back from Torquay Harbour area and again did not see in principle any difficulties in redevelopment at the scale proposed. Materials specification strategies and the play of light and shade on any modelling of the façade will need further consideration and, we would expect, to be tested with accurate CGI renderings.

The vehicular access and servicing of the site, given its proportions and the 'tightness' of the site, is challenging.

The north-eastern end of the site forming a 'prow' in between the two vehicular routes needs and deserves particular attention – it will be a very powerful and prominent end of the building.

The Initial Design Approach

The bold sweep of the proposed building is supported, whilst the use of two different materials for the two halves of the hotel is understood as a means of relating the scale more closely to the context, we would have been interested to see the building tested as a more singular, consistent proposition – still gaining height towards the north-eastern end – but not so evidently sub-divided. This option ought to be explored. Clearly the massing relates to the location of the internal vertical circulation cores and we wonder if there isn't an opportunity for a final 'flourish' at the north-eastern end? We welcome retaining a view corridor on the western side of the site.

The idea that the form is conceived to have a heavier 'rear' bank of rooms (overlooking the railway) and a lighter 'front' bank of rooms seems to make great sense. We would encourage a far bolder horizontally emphasised aesthetic for the front bank, stretching/sweeping along the site, parallel (or almost parallel) to the main road. The semi-circular finale of this form at the north-east end seemed very appropriate.

By locating the vehicular entrance in the centre of the plot and allowing drop off at the main building entrance here, it is difficult to make this entry condition attractive for pedestrians. The character will be dominated by the necessary design and detailing for vehicles. The use of this same arrangement for receiving coaches was not quite possible for us to understand, but presumably there have been vehicular tracking assessments that show this to be possible. Whilst all may be proven to 'work', we are left wondering if the result will be sufficiently elegant as an experience for guests, and therefore some time spent exploring some alternative options / parking formats would be recommended. It is also difficult, visually, where the mezzanine level of parking pushes forward in front of the building line established by the rooms above – this will ensure that this part of the site will appear to be overwhelmed with vehicles. The edge of the mezzanine needs to be held back and the edge detailing of the balustrade to the deck needs careful thought – the current stone cladding seems incongruous.

We are concerned about the new edge being formed to the main road – a coherent idea needs to be established that retains a characteristic stone boundary to the site and we might expect that a 2 – 3 metre planting zone as part of the landscape design (both in front of the parking areas and above the semi-subterranean spa element). This planting should be luxuriant and bold and, if possible, space should be found for some larger trees (especially at the southern end).

The route into the building and up to the main reception level needs to be elegant and more intuitive than we currently detect. Consider opening out double-volumes to allow direct eye contact between the reception desk and the entrance doors below. The main staircase could be tested in alternative configurations and locations in the plan – perhaps the final ascension and arrival on the main level should consider the potential for sea views, straight ahead?

If a little more height could be gained on the north eastern end of the building then a rooftop bar / restaurant spilling out onto the adjacent flat roof would be incredibly attractive and benefit from good orientation and excellent views. Rooftop plant might also be elegantly incorporated within the same structure?

We see that the internal organisation of the plan is tight, but we regret how the public function rooms push forward of the building line above – this needs further exploration and ideally we believe a flush relationship should be aimed for. Whilst the presence of the railway is not a significant difficulty, we wonder whether some form of visual screening or softening (perhaps by means of planting) is worth considering to improve views from overlooking properties to the rear of the building?

Night-time (illuminated) appearance and handling of signage will be key considerations as part of the overall aesthetic being aimed for.

The More 'Developed' Version of the Design

In your additional development and analysis you explored options to break down the form and massing further – but we do not see any great merit in this – surely the building needs to be confidently and honestly, primarily a horizontal composition? Whilst the north-eastern end is clearly the dominant one, there may be some merit in adjusting the position of the south-western stair core in order to allow this end of the building to be more flexible in how it presents to the approach along the main road?

In further discussing and considering the strategy for accommodating car-parking there seemed to be an option to excavate to a greater extent under the north-eastern half of the building and thereby relieve pressure elsewhere (arrival/entrance area and external landscape spaces?). This approach would certainly be supported.

The variegated architectural language which accompanies the breaking up of the mass seems particularly retrograde as a design tactic and hope that this can be avoided.

We encourage the development of a sustainability strategy for the project and this we hope might have a natural influence over the design of the facades and their passive environmental performance. The panels of bright colour indicated on the images seem rather forced and more subtle/useful tactics for introducing irregularity within the elevation might be explored. We are surprised that balconies do not seem to be part of the client brief in this location.

Concluding Remarks

Our main concerns are to do with accommodating the arrival and presence of

vehicles on the site – options ought to be explored before confirming the strategy. We urge that the formal design is bold and uncompromised – there are clear precedents of good contemporary and modern design nearby which are confident in expressing their basic building anatomy.

11.06.2018

Design Issues deserving some further attention

We are pleased to see the new treatment of the northern end of the project, where we were calling for a bolder 'prow' in this prominent position. The design is more confidently handled in this respect but we noted a dis-satisfying 'duality' emerging between the front and rear components of the building as they presented in this end elevation. We think that options ought to be drawn / tested that examine the effect of a little greater height to one or the other, and the possible exploration of some alternative detailed strategies for dealing with the articulation of the joint where they meet. Once the compositional principles have been established then it would be good to transfer and repeat these on the simpler southern end of the building.

We are still disappointed to see the weakness of the main arrival stair up to reception. A 90 degree dog-leg is a fairly inelegant type and we feel that the movement of guests at this key moment of arrival needs to be gracefully choreographed by the optimum placement and configuration of the important staircase. The opportunity of exploiting good views out to sea as a key part of this pattern of movement should be seized.

The bold horizontal lines of the building are successful and only broken by the central vertical gap – making the detailed handling of this gap crucial. We debated whether or not vertical or horizontal glazing bars ought to be deployed – we think options for both ought to be tested.

We were much more certain that the 'additional' room which had been placed within this elevational zone of the building was a mistaken idea and this needs addressing – either by re-planning to remove the room from this location, or by reducing the width of the gap to merely denote the common parts (although we have doubts about the aesthetic impact of this latter strategy).

The rear elevation (facing the railway) is bound to be more of a challenge to maintain and we firmly recommend considering a finish / construction that is low or zero maintenance to ensure graceful aging of the appearance.

Concluding Remarks

We believe that the points raised above can be relatively easily addressed and we are pleased to offer our support for this project. It should provide an exciting,

handsome and positive addition to this part of the seafront.

Pre-Application Advice

Pre-application advice (reference DE/2018/0030) was given in relation to a proposal to redevelop the site with a new hotel. The letter was issued on 10th May 2018 and is appended to this report (Appendix B).

Summary of Representations

The application is accompanied by a Statement of Community Involvement detailing the applicant's community engagement efforts. These have included a public exhibition and the use of a dedicated website. The Council has publicised the application through the use of letters, site notices, and advertisements in the local press.

201 representations have been received in total: 4 in support, and 197 objecting to the proposal. 161 objections had been received prior to the receipt of amended plans in February, and a further 36 have since been received re-iterating previously raised concerns.

The letters of objection include representations from members of the public; the Torquay Neighbourhood Plan Forum; the Cockington, Chelston, and Livermead Community Partnership; and the Torbay Coastal Heritage Trust. A summary of the concerns raised to date, where material to planning, is as follows:

- The proposal is contrary to the policies of the Torquay Neighbourhood Plan, the Torbay Local Plan, and the National Planning Policy Framework;
- Height, scale, bulk, and massing on a constrained site considered excessive, amounting to over-development;
- The regeneration benefits are limited in the location proposed and would not outweigh the harm that the proposal would cause;
- Harm to the character of the area, contrary to Para. 127 of the NPPF;
- Out of proportion in comparison to the existing building;
- Would dominate the local landscape;
- Would be forward of the existing building line;
- Overlooking, loss of natural light, and an overbearing effect in relation to neighbouring buildings and properties, including, but not exclusive to, the Corbyn Apartments and Cromartie Point apartments;
- Noise, dust, air quality, and light intrusion nuisances, along with general disturbance, arising from construction; traffic; deliveries, air conditioning and other plant; and the use of the outdoor terrace areas in relation to neighbouring properties, particularly Corbyn Apartments, Cromartie Point, and others around Livermead Hill;
- Proposal inappropriate in a quiet residential setting;
- Likely traffic impacts and harm to highway safety, particularly along that part of the public highway in relation to the bus stop, crossing pedestrians, and nearby junctions;

- Shortcomings in the submitted Transport Assessment;
- Insufficient numbers and types of parking spaces, including disabled spaces, on-site and lack of public car parks likely to result in overspill parking and congestion in surrounding streets, contrary to Policy TA3;
- Insufficient bicycle storage;
- Visitors to the hotel are unlikely to use public transport;
- Inadequate and dangerous servicing arrangements proposed for Livermead Hill;
- Bridge over the railway line is weak and cannot cope with HGVs or significant additional traffic;
- Will set a precedent for similar development;
- Greater in height than allowed by Policy DE4 of the Local Plan, and TH8 of the Torquay Neighbourhood Plan;
- Risk of flooding;
- Lack of landscaping.
- The changes made to the submitted plans have not addressed issues around the proposal's scale and appearance, parking arrangements, and other matters previously raised.

The four letters of support state that:

- The existing hotel is outdated and not compliant with health and safety standards;
- The design and scale of the proposal would complement the seafront and surrounding area;
- There would be benefits to the local economy.

A joint letter of representation received from the applicants and the owners of the neighbouring Corbyn Apartments discusses a number of non-planning issues, including access rights and access to light, relating to a separate planning application to change the use of holiday lets at that site to permanent dwellings. The matters raised are not considered to be material planning considerations.

Relevant Planning History

There are no previous planning decisions of particular relevance to the proposal.

Key Issues/Material Considerations

The matters for consideration are:

1. Principle of Development
2. Economic Benefits
3. Design and Visual Impact
4. Impact on Amenity
5. Trees and Ecology
6. Flooding and Drainage
7. Highways Impact

8. S106

9. Other Considerations

1. Principle of Development

There is an established hotel use at the site, and the proposal is therefore acceptable in principle.

Insofar as the proposal would result in the replacement of the existing hotel, Policy TO1 of the Local Plan promotes the improvement, modernisation and the addition of new tourism facilities in order to attract new visitors, particularly overnight, to support the local economy. The Policy states that the Council wishes to see the quality of accommodation improved, with a wider range of new and refurbished facilities and services. This will be achieved by supporting the principle of new tourist accommodation, subject to other policies in the Local Plan, and the creation of new high quality tourism accommodation in sustainable, accessible locations. The Policy also states that Core Tourism Investment Areas (CTIA), such as the site's location, are the main focus for investment in tourism.

Policy TE1 of the Torquay Neighbourhood Plan states that new tourism developments will be supported where, in particular, they make use of brownfield land. Policy TS4 (Support for Brownfield and Greenfield Development) confirms that:-

Development proposals for brownfield sites will be supported, providing there are no significant adverse impacts, having regard to other policies in this plan.

The proposed hotel would provide a larger, modern and improved tourist facility in an area allocated for such developments within the Local Plan, on brownfield land, and in place of a tired and apparently unviable hotel. Furthermore, the Torquay Neighbourhood Plan specifically addresses tourism and highlights Torquay as a 'destination in transition'. The Neighbourhood Plan also refers to 'Turning the Tide for Tourism', which identifies an oversupply of in small B&B guest house sector (less than 10 rooms) with a significant oversupply of low quality, low value added small hotels. There is an identified lack of good quality, large hotels and branded chains.

The proposal is considered to be acceptable in principle.

2. Economic Benefits

Policy SS1 (Growth strategy for a prosperous Torbay) of the Local Plan states that development should reinforce Torbay's role as a main urban centre and premier resort. Policy SS4 (The economy and employment) supports the regeneration of Torbay and improvement in its economic performance, with the aim of achieving a step-change in economic prosperity as set out in Torbay's Economic Strategy. The

Local Plan supports existing businesses; it encourages new businesses and investment into the area in order to create new jobs; and it promotes the expansion and diversification of the economy of the Bay. The Local Plan seeks to promote growth in sectors that are particularly important in Torbay, namely tourism and catering.

Policy SS11 (Sustainable communities) explains that proposals that regenerate or lead to the improvement of social, economic or environmental conditions in Torbay will be supported in principle.

Policy TC5 (Evening and night time economy) states that the Council supports, in principle, development that helps create a vibrant, diverse evening and night-time economy within the town centres, seafront and harbour areas of the Bay.

Objectors have stated that the regeneration benefits of the proposal are limited in the location proposed, and would not outweigh the harm that the proposal would cause.

The proposal would result in the replacement of what is considered to be a tired and, according to the submitted information, loss-making and unviable hotel, which is scheduled to close in the Spring of 2019, with a modern hotel facility. The submitted information states that some of the existing guestrooms are as small as 10sqm in area, whereas the guestrooms forming part of the proposal would have floor areas around 24.5sqm or more. The proposal would include visitor attractions available to the general public as well as hotel guests, including a spa, roof-top bar, and restaurant. The applicant's submitted viability report concludes that a 152-bed hotel is the minimum size required to ensure a viable scheme, ensuring the necessary efficiencies within the business to deliver cash-flows which derive a value in excess of the cost of delivery. These conclusions have been independently corroborated by the Council's viability advisor.

It is estimated that the proposal would result in around £20 million being invested in the site. It is anticipated that the proposed hotel would operate year-round and accommodate up to 304 guests at any one time. Assuming an occupancy rate of 75%, the submitted information estimates that there would be 83,000 sleepers per annum, generating up to £2.7 million of extra leisure spend per annum in Torbay. It is anticipated that the new hotel would create around 110 new full-time equivalent jobs compared to the 30 currently employed, 20 of which are full-time. During the construction phase there are likely to be additional jobs created. Including the construction phase, the gross value added (GVA) could be in excess of £6 million.

The Torbay Development Agency supports the application, noting that:

“Of particular importance, the new hotel will support the development of the visitor economy, currently worth £430m, attracting 4.6m visitors a year. The proposed

investment aligns to the ambitions of the English Riviera's Destination Management Plan 2017-2021 including:

- *Attracting new visitors (particularly international)*
- *Attracting investment*
- *Improving the quality of accommodation*
- *Improving hotel occupancy throughout the year*

The current proposals present a purpose built hotel with improved leisure facilities which the modern fully independent traveller (FIT) expects. For overseas travellers especially, having an internationally recognised hotel brand available to book online all year round will undoubtedly attract new visitors to the destination.

The demand for quality holidays in the UK is also continuing, with 'staycations' expected to increase and importantly, moving into the 'shoulder' and winter months – this is also a shared strategic objective of the English Riviera BID Company Business Plan."

Given that the proposal would modernise and enhance the tourism facilities available at the site; create new jobs; and is expected to generate significant additional spend within the local economy, it is considered that it corresponds with the aspirations of Policies SS1, SS4 and SS11 of the Local Plan, and would bring economic benefits to the Bay compared to the existing situation.

3. Design and Visual Impact

The National Planning Policy Framework states that one of the core land-use planning principles that should underpin decision taking is to always seek to secure high quality design. In addition it states that 'permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions'. New development should be sympathetic to local character and history, including surrounding built environment and landscape setting.

Consistent with these paragraphs, Policy SS11 of the Torbay Local Plan states that development must help to create cohesive communities within a high-quality built and natural environment where people want to live and work and that development proposals will be assessed according to whether they achieve certain criteria as far as they are relevant and proportionate to the development. Criterion 3 refers to development that helps to develop a sense of place and local identity and criterion 10 refers to delivering development of an appropriate type, scale, quality, mix and density in relation to its location.

Following on from this, Policy DE1 states that proposals will be assessed against their ability to meet design considerations such as whether they adopt high quality architectural detail with a distinctive and sensitive palette of materials and whether they positively enhance the built environment.

Policy TH8 of the Torquay Neighbourhood Plan states that development must be of good quality design, respect the local character in terms of height, scale, and bulk; and reflect the identity of its surroundings.

Policy DE4 (Building Heights) states that the height of new buildings should be appropriate to the location, historic character and the setting of the development. New development should be constructed to the prevailing height within the character area in which it is located, unless there are sound urban design or socio-economic benefits to justify a deviation from this approach. The policy goes on to state that new buildings above the prevailing height will be supported where they:

- Enhance the vitality of an area
- Contribute to the regeneration of Torbay
- Strengthen the character of an area
- Are appropriate in terms of their visual impact
- Provide wider urban design or socio-economic benefits
- Make a positive addition to the built form, townscape and surrounding landscape; and
- Preserve or enhance local and long-distance view, and key vistas.

Objections to the proposal have stated that it would result in harm to the character of the area, contrary to the guidance contained in the NPPF along with Local Plan and Neighbourhood Plan policies. The height, scale, bulk, and massing on a constrained site are considered excessive, amounting to over-development. It is stated that the proposal would be out of proportion to the existing building, that it would dominate the local landscape, that it would be forward of the existing building line, too tall in comparison to other buildings in the locality and therefore contrary to Policy DE4 of the Local Plan, and that it would suffer from a lack of landscaping.

In terms of the proposal's height, it is worth bearing in mind that measuring building by storey heights alone can be misleading. Floor to ceiling heights can vary from building to building, ground levels can vary from site to site, and, as in the current case, some floors can be sub-surface. The proposed building would vary in height from one end to the other, and would include sub-surface elements. Above ground level, the proposal would range in height from four storeys at its southern end (around 15m from ground level), up to six storeys in height at its northern end (21m), where the highest floor would be recessed to reduce its visual impact.

Whilst it would be taller than other buildings in the local area, it is noted that its immediate surroundings are characterised by a range of building types and sizes, and that ground levels are subject to significant change. When the prevailing ground levels are taken into consideration, the proposal, at its tallest point above ordnance datum (AOD) would only be around 3m higher than the Cromartie Point Flats, which are located on higher ground, approximately 31m to the west. This

excludes two lift overruns measuring around 1m in height and set well within the proposed roof. A number of 4+ storey buildings, which are also located close by, are located on significantly higher ground and, arguably, have as imposing an effect as the proposal would, if not more so depending on the vantage point. These include the Sunleigh Apartments, Panorama, and Hyperion, and there are other examples.

In considering the “prevailing” building heights in the local area, a further consideration is how far to ‘cast the net’ in terms of what the “local area” is. It seems reasonable to consider the site as forming part of a wider waterfront character area stretching northwards and parallel with the coast, and encompassing the wider Core Tourism Investment Area in which it is located. Considered in this way, the proposal would be quite in keeping, in terms of its height and scale, with other buildings located along the coast line, including the Grand Hotel, the Seaway Court building, and Abbey Sands development, all of which are located off Torbay Road.

It is noted that the Building Heights Strategy, which formed part of the evidence base for the Local Plan, states that tall buildings can be acceptable in the Coastal Zone in which the site is located, subject to the guidance contained in Chapter 6 of that document. Tall buildings in this context are defined as being twice the prevailing height in areas of varied height. It is considered that the heights of buildings in the area under consideration are varied, although the site’s immediate context does include a number of structures that are 3-4 storeys in height. It is therefore debatable whether the proposal (being up to six storeys above ground level) ought to be considered a tall building in relation to the Building Heights Strategy. In any case, Chapter 6 states that tall building proposals will be required to demonstrate either urban design or socio-economic benefits, and provides further criteria against which tall buildings should be considered. These criteria include location, conservation, views, topography, design, public realm, streetscape, microclimate, amenity, land use, and sustainability. Some of these elements are considered in other sections of this report. In terms of the criteria relating to the proposal’s visual impact, the proposal is considered acceptable for the reasons set out in this section of the report.

In terms of its height and scale, the revised scheme is considered to be appropriate to the location, historic character, and the setting of the development. Even if the proposal were considered to be above the prevailing heights in its character area, as the proposal would result in the replacement of a tired and unsightly building with what is considered to be a significant visual and townscape improvement; that it would preserve wider public views; would strengthen the character of the area and be appropriate in terms of its visual impact; enhance local and long-distance views; bring socio-economic and regeneration benefits, and contribute to the vitality of the CTIA and immediate locality; it is considered that there are sufficient grounds to allow for an exception in this case, as allowed by Policy DE4.

The proposal would involve a significant increase in the quantum of development at the site, compared to the existing situation. It was noted in the previous section that an independently corroborated viability report concludes that the scale of development proposed is necessary to ensure an economically viable hotel development at the site. However, given that the proposal, in terms of its overall size, is not considered to be unacceptably harmful to the character of the area or local amenity, and that it would provide what are deemed to be acceptable arrangements in relation to parking, access, amenity space, landscaping, and other services, that the proposal would not result in an over-development of the site. Public realm improvements would include enhanced pedestrian access along the public highway.

The proposed development was considered by the Torbay Design Review Panel, and their comments are regarded as a material consideration. It was concluded that a development along the lines proposed would be acceptable in this location. The proposal is seen as an opportunity to 'bookend' the wider seafront landscape, which, as discussed above, incorporates a number of buildings of a similar height and scale to that being proposed. A bold, horizontally orientated façade, in keeping with other waterfront developments, such as Abbey Sands and Seaway Court, was also encouraged. In terms of its design and appearance, the proposal is considered to be consistent with the advice and conclusions of the design review process. The proposal would incorporate a range of materials, including red sandstone to the lower boundary structures, to front Torbay Road, and in keeping with the historic character of the area. The remainder of the building would incorporate a mixture of white and black/blue brick, glazing, zinc cladding, and coloured aluminium composite panelling.

The proposed building would be set forward of the street-line marked by the existing buildings located alongside Torbay Road in the vicinity of the site, however, the proposal would still maintain what is considered to be a sufficient area of open space to the front to prevent unacceptable harm, particularly considering the other benefits of the proposal in relation to the character of the area.

Policy C4 states that development proposals should seek to retain and protect existing hedgerows, trees and natural landscape features. The site is currently very limited in terms of its landscape features. The submitted landscaping information shows proposed hard and soft landscaping along the frontage of the site, with terracing, steps, tree and shrub planting which it is considered would improve the appearance of the site. The Council's Arboricultural Officer has raised no objections to the proposal subject to the use of a condition to secure a scheme of landscaping.

With specific regard to the Torquay Neighbourhood Plan Policy TH8 of the Torquay Neighbourhood Plan, much of the above assessment considers the issue of design quality. However, it is important to highlight that Policy TH8 does not require a

replication of the existing building at the site in terms of its scale, height and bulk but requires that the new development is of a good quality and reflects the identity of its surroundings. The policy is well founded as, in design terms, it is considered that the focus of design should always be about responding to the context of the site and identity of the area. In this respect, officers are satisfied that the building is of an appropriate design quality to meet the requirements of the policy.

It is considered that the form and layout of the scheme would make effective use of what is brownfield land, and that the proposal responds well to the topography of the site. It would result in a significant enhancement of what is a visually prominent site within the CTIA, replacing a dated and tired structure. There would not be any harm to heritage assets and the proposal would result in urban design benefits. Given the proposal's siting, layout, scale, and overall design, it is considered that it would not result in any unacceptable harm to the character of the area. Subject to the use of conditions to secure the use of high quality materials; a scheme of hard and soft landscaping; boundary treatment details; external lighting, bicycle, and refuse storage arrangements, it is considered that the proposal is in accordance with Policies DE1, DE4, and SS11 of the Local Plan, Policy TH8 of the Torquay Neighbourhood Plan, and the guidance contained in the NPPF.

4. Impact on Amenity

Policy DE3 of the Local Plan states that development proposals should be designed to ensure an acceptable level of amenity.

Objectors, including the Torquay Neighbourhood Plan Forum, have raised concerns about the proposal's potential impact on neighbouring and local amenity. Reference is made to overlooking, loss of natural light, and an overbearing effect in relation to neighbouring buildings and properties, including, but not exclusive to, the Corbyn Apartments and Cromartie Point apartments. Concerns have also been raised about the potential for noise, dust, air quality, and light intrusion nuisances, along with general disturbance, arising from construction works but also during the use of the development, owing to traffic, deliveries, air conditioning and other plant, and the use of the outdoor terrace areas, particularly in relation to the Corbyn Apartments, Cromartie Point, and other properties around Livermead Hill. The proposal is considered to be inappropriate in a quiet residential setting.

The site is located within the Core Tourism Investment Area; it is occupied by a hotel and is located in close proximity to other, long established hotel developments, including the Livermead Cliff Hotel, which is located immediately to the east, and Livermead House Hotel, located to the north. The site's western and eastern boundaries adjoin a railway line and Torbay Road respectively, the latter being a well trafficked route between Torquay and Paignton.

The proposed building would be located around 12m to the west of the nearest

residential property along Livermead Hill, known as Sea Jay. The Cromartie Point apartment building would be located around 32m from the main body of the proposed hotel, at its nearest point, with the apartment building being located on higher ground (the difference being around 3.6m at this point.) The adjoining Corbyn Apartments would be located approximately 9m to the south of the building, with an access ramp to the lower car park and a boundary wall being located between the two. Otherwise, the nearest residential property, located to the west of the Corbyn Apartments on the opposite side of the railway, would be a house and its curtilage located at the north-eastern end of Woodleys Meadow. The curtilage of this property would be located around 19m from the proposed hotel, and the dwelling in excess of 32m. The Sunleigh and Panorama apartments, which are located on higher ground to the west of the proposed hotel, would be located in excess of 40m away. The Livermead Cliff Hotel would be located around 46m to the east. Further dwellings, located to the south, would be located in excess of 60m away.

The neighbouring properties that would be most affected by the proposal would be the units at the northern end of the Corbyn Apartment building, which have windows facing into the site; the nearest property located along Livermead Hill, known as Sea Jay; the Cromartie Point apartments and Panorama; and the aforementioned property located at Woodleys Meadow.

Daylight and Sunlight Impacts

The application is supported by a Daylight and Sunlight Study, which has been prepared by chartered surveyors who specialise in the effects of development on light, and right-to-light issues. The guidance contained in the NPPF states that a flexible approach to daylight and sunlight impacts should be taken by planning authorities to ensure the efficient use of land. The study aims to assess the impact of the development on the light receivable by neighbouring properties, and is based on the tests established in British Research Establishment (BRE) guidance, which is linked to the requirements of British Standard 8206. The study considers daylight and sunlight availability to windows, along with overshadowing to gardens and open spaces.

It is concluded that, with the proposed development in place, all but one of the neighbouring windows pass the relevant tests in relation to sunlight availability, both during the winter and summer months, once factors such as overhanging balconies are taken into consideration. The one exception falls short by a very small amount. In relation to overshadowing to gardens and open spaces, the proposal far exceeds the requirements of the BRE test. In terms of daylight availability to neighbouring windows, the proposal passes the relevant tests, except in relation to isolated windows at Cromartie Point, The Corbyn Apartments, Seajay (referred to as Oversands in the study), and Panorama. However, once overhanging balconies are taken into consideration, along with the nature of the rooms affected (mostly bedrooms or kitchens, where daylight is less important),

the remaining impacts are considered to be low. Where living room windows fall short of the BRE tests, it is by a very small amount, and the guidance is intended to be used flexibly.

The study concludes that the proposal would have a relatively low impact on the light receivable by its neighbouring properties, and that there are no daylight or sunlight related reasons why planning permission should not be granted.

The Corbyn Apartments

The Corbyn Apartments building includes flats at its northern end, which include windows that face towards the site. The southern end of the hotel would be located approximately 9m from these windows, although the curtilage of the application site would be between 0.8m and 2m from this building. The proposal would involve the erection of a 1.8m high wall along this boundary. An access ramp leading down to the under-croft car park, along with part of the car park itself, would be located between the proposed building and the side of the Corbyn Apartments. The openings in the north-eastern elevation of this neighbouring building relate to two holiday lets (ground and first floor), and two residential flats (second and third floor.) The windows in each case relate to a bedroom, a kitchen and a lounge (secondary window in this case.)

In terms of privacy, it is considered that the proposal would not result in any unacceptable harm. The only openings to be located in the proposal's southern elevation can be obscure glazed if necessary, and a condition can be imposed to secure this. In terms of outlook and access to natural light: the proposal would introduce new built development in closer proximity to the neighbouring windows than is currently the case, amounting to around 15m in height, 9m away. Given the nature of the way kitchens and bedrooms tend to be used, the loss of outlook in relation to these rooms is considered acceptable. The lounge windows facing the development are secondary openings, and the proposal would not affect the quality of outlook from the main, east-facing openings of these rooms. In terms of noise and other disturbance, it is noted that the site is already in use as a surface-level car park at the southern end of the site. The proposed sub-surface car park is likely to move car parking further away from the windows under discussion, with most of the spaces being screened by the proposed building. It does not seem likely that the proposed car park and its access would see significant usage at unsociable hours and given their siting and design, it is considered unlikely that there would be any unacceptable increase in disturbance to the Corbyn Apartments, over and above the existing situation.

Seajay, Oversands, and Rosaire

The nearest neighbouring properties located along Livermead Hill are Sea Jay, Oversands, and Rosaire, the closest of which is Sea Jay, located around 12m from the proposed building, and 9m from the proposed loading bay. It is noted that these

neighbouring buildings are generally orientated towards the south-east and that the proposal would not be located within their main line of sight towards the sea. Sea Jay does include openings within its south-western elevation, facing towards the site, and includes a wrap-around balcony along this and its south-eastern elevation. The proposed building would not be located directly within the line of sight even of this building's south-western elevation, although it would be visible and have an effect on this building's outlook. This neighbouring property is generously served by openings facing the south-west and south-east, and given the proposal's siting, scale, and design, it is considered that it would not result in an unacceptable loss of outlook in relation to this neighbouring property. The privacy of this dwelling's occupiers can be secured through the use of conditions to ensure that the proposed roof-terrace includes a privacy screen, and obscure glazing in relation to the roof-top bar. It is noted that the proposed guestrooms at the northern end of the building would not include any openings facing towards this neighbouring property. Seajay is located alongside Livermead Hill and so will already experience a degree of noise disturbance from the public highway. The proposed delivery bay would serve to create some additional disturbance, however, this element of the scheme will not be in constant use and a condition can be imposed to limit its use to more sociable hours of the day. It is considered that the proposal would not result in any unacceptable harm to Oversands or Rosaire, in terms of their outlook, access to light, or privacy, given their distance from the proposal and orientation, and the proposal's siting, scale, and design.

Cromartie Point Flats

The Cromartie Point flats are located between 30m and 40m from the rear of the main body of the proposed building, and its communal garden area would be located around 22m away at the nearest point. This building is located on higher ground than the proposal and, as such, whilst the proposal would be a taller structure, at its tallest point, it would only be around 3m higher than the top of this neighbouring building. This neighbouring building is orientated towards the east and, as such, the proposed hotel would be located within the line of sight of these flats, and it would obstruct views that this building's occupiers currently experience. However, the loss of private views is not a material planning consideration. Given the separation distances involved and the proposal's height relative to this neighbouring building, along with the other aspects of its design, it is considered that it would not result in unacceptable harm to the amenities of the occupiers of this building, in terms of their outlook, privacy, access to light, or in relation to general disturbance.

Woodleys Meadow

The nearest dwelling located at Woodleys Meadow would be located in excess of 32m to the south-west of the proposed building, with the nearest part of its rear garden being located around 19m away. The proposal would introduce a degree of overshadowing within the rear garden environment by introducing built

development in closer proximity than is currently the case. However, it is noted that this property occupies what is already a constrained site, with the Corbyn Apartments being located to the east, on the opposite side of the railway, and higher ground levels located to the north. In terms of this property's outlook, access to natural light, and privacy, it is considered that the proposal would not result in unacceptable harm to the amenities of this property's occupiers.

General Amenity Considerations

The Council's Community Safety (environmental health) officers have raised no objections to the proposal, subject to the use of conditions: to limit noise from any proposed extractor equipment and roof-top plant; to secure a construction management plan to prevent unacceptable levels of nuisance during the demolition and construction phase of the development; and to limit the use of the roof-top terrace to certain times of the day. Conditions can also be imposed to ensure the installation of obscure glazing in relation to any windows directly facing the Corbyn Apartments and in relation to the roof-top bar where it would allow overlooking towards properties at Livermead Hill; to require the installation of a privacy screen on part of the roof-terrace; to limit the hours of use for the loading bay located along Livermead Hill; and to secure the details of boundary treatment and external lighting.

Subject to the use of these conditions, it is considered that the proposal, given its siting, scale, design, and relationship to neighbouring properties, would not result in unacceptable harm to the amenities of neighbours, in terms of their outlook, access to natural light, privacy, or other nuisances such as noise, dust-drift, or light-intrusion. As such, the proposal is in accordance with Policy DE3 of the Local Plan.

5. Ecology

Policy NC1 seeks to conserve and enhance Torbay's biodiversity and geodiversity, through the protection and improvement of terrestrial and marine environments, and fauna and flora, commensurate to their importance. Policy TE5 of the Torquay Neighbourhood Plan states that, where appropriate, an assessment of impacts upon any existing protected species or habitats should be undertaken, and the use of necessary mitigating arrangements, in order to protect and enhance species and habitats, should be provided.

The site is comprised of hardstanding areas and the existing hotel building, and is of very limited ecological value.

A submitted bat and breeding bird survey has confirmed that the proposal would not result in significant harm to protected species, subject to the use of mitigation measures, and it is recommended that these be secured through the use of a planning condition. The construction phase would result in the loss of a number of

potential roost features which are present on the existing building, however as these features are only likely to support individual or low numbers of bats, the proposal is considered unlikely to significantly affect local bat populations. Suitable replacement roosts can be provided through the installation of five bat tubes (Schwegler 2F or similar approved) at a height of at least 5m on the south-eastern and south-western aspects of the new hotel. A condition can also be imposed to secure the installation of five bird boxes, as recommended by the submitted information.

Roosting, foraging and commuting bats could be affected by lighting on the exterior of the new hotel. In order to mitigate any potential negative effect, the proposed lighting design would need to avoid direct illumination of the locations of the bat tubes. A scheme of external lighting can be secured through the use of a planning condition.

The site is located alongside the railway, which is designated in the Local Plan as a County Wildlife Site. However, as the proposal would not involve works to the railway, and that measures will be secured through the use of planning conditions to prevent dust-drift and other effects on the railway during the demolition and construction process, it is considered unlikely that the proposal would result in unacceptable harm to the County Wildlife Site.

The Local Planning Authority has undertaken an appropriate assessment of the proposal in accordance with the Habitats Regulations, which has concluded that, considering the proposed mitigation measures, the integrity of the Lyme Bay and Torbay Marine Special Area of Conservation would not be affected by the proposal.

Natural England have raised no objections to the proposal.

In light of the foregoing, the proposal's ecological impacts are considered acceptable, having regard to Policy NC1 of the Torbay Local Plan, and Policy TE5 of the Torquay Neighbourhood Plan.

6. Flooding and Drainage

Policy ER1 (Flood risk) states that development must be safe for its lifetime, taking account of its future use, function and government projections of how the risk of flooding may change in response to climate change. Development proposals will be expected to maintain or enhance the prevailing water flow regime on-site, including an allowance for climate change, and ensure the risk of flooding is not increased elsewhere.

The Torquay Neighbourhood Plan Forum has referred to Policy TE7 of the Torquay Neighbourhood Plan, which concerns development proposals that are adjacent to the coastline. As the application site is not adjacent to the coastline, this policy is

not a material consideration in this case. The Forum has also questioned whether the proposal should be assessed against Marine Management Organisation (MMO) policies owing to the proposed discharge of surface water to the sea. MMO policies are not material in this case as the proposal would not involve any development within the relevant parts of the marine environment. As far as the discharge of surface water is concerned, it is noted that the Environment Agency and South West Water have not raised any objections.

Objectors have raised concerns about the potential for flooding at the site. The Environment Agency have not raised any objections to the proposal. South West Water have raised no objections to the proposal, providing that sewage would be disposed of through the mains sewer, and surface water drained to the sea. The proposal would comply with these requirements. The Council's Drainage Engineer has raised no objections to the proposal.

The guidance contained in the NPPF requires the Local Planning Authority to apply the Sequential Test to the proposal, where the objective is to direct development towards land at the lowest risk of flooding. The proposal would result in the replacement of an existing hotel building which is located within Flood Zone 3. It is considered that the proposal would result in public benefits with the site in question being used to provide an improved tourist facility within the Core Tourism Investment Area. Although a new hotel may be sited elsewhere, within areas at lower risk of flooding, in this case (i.e. replacing an existing hotel in a prominent location close to the seafront and within the Core Tourism Investment Area) there are not considered to be more appropriate sites within Flood Zones 1 or 2 that could accommodate the development, and it is therefore considered that it passes the Sequential Test.

According to the Planning Practice Guidance, the proposed less vulnerable and more vulnerable uses proposed are deemed to be appropriate uses within Flood Zone 3. The Exceptions Test requires the Council to consider whether there are wider sustainability benefits to the community of allowing the proposal, and whether it could be made sufficiently safe for its lifetime. As discussed, it is considered that the proposed development would result in wider sustainability benefits, by providing an improved, replacement hotel, with associated economic and regeneration benefits contributing to the vibrancy of the Core Tourism Investment Area. In terms of the proposal's safety, the submitted Flood Risk Assessment makes a number of recommendations intended to ensure this.

Subject to the use of the aforementioned condition, the proposal is considered to be acceptable, having regard to Policy ER1 of the Torbay Local Plan, the NPPF, and the PPG.

7. Highway Impact

Policies TA2 (Development Access) states that all development proposals should

make appropriate provision for works and/or contributions to ensure an adequate level of accessibility and safety, and to satisfy the transport needs of the development. Policy TA3 (Parking Requirements) states that the Council will require appropriate provision of car, commercial vehicle and cycle parking spaces in all new development. Greater flexibility on levels of provision has been provided in town centres, where there is more opportunity to make journeys through walking and cycling. Appendix F provides figures on car parking requirements, for hotels this states that 1 space per guestroom plus appropriate provision for coaches is required; in instances where the location of the hotel and its setting may limit the parking available the availability of public spaces will be taken into account.

Policy TH9 of the Torquay Neighbourhood Plan states that new major developments must contribute to better pedestrian/cycle links where possible and encourage modal shift towards active travel. Policies THW1 (Travel Plans), THW5 (Access to Sustainable Transport), THW6 (Cycle Storage and changing facilities), and TTR2 (Sustainable Communities) are also of relevance.

Objections have been received in relation to the proposal's impact on access and parking arrangements, and likely impacts on highway safety, all of which were summarised earlier in this report.

The proposal would involve works within the public highway, to be secured through the completion of a Section 278 agreement, and these include the widening of the existing access at the southern end of the site, to serve as the site's vehicular entrance; the creation of a new egress point further to the north of this; improvements to part of the footpath located along Torbay Road; and the creation of a loading bay along Livermead Hill. The proposal would include 101 parking spaces (6 disabled spaces and 4 to include electric charging points), equating to two spaces per three guestrooms, which is comparable to the existing situation; temporary space to accommodate two coaches for the purposes of temporary dropping-off; along with bicycle storage and pedestrian access from both Torbay Road and Livermead Hill.

The Council's Structural Engineer has requested the use of a condition to secure details of the proposed demolition and construction works with a view to preventing any harm to the structural integrity of the public highway. This condition can be imposed should planning permission be granted.

The Council's Strategic Transport Officer is satisfied that the proposal would not result in unacceptable harm to pedestrian or road safety, taking into consideration the proposed access and egress arrangements along Torbay Road and the capacity of the proposed junctions; the proposed loading bay along Livermead Hill; and the proposed pedestrian arrangements, including the increased use of the bridge at Livermead Hill. However, this is subject to a road safety audit being secured by condition, which may result in measures such as new signage being introduced along Livermead Hill, and the completion of highway works to be

secured through a S278 agreement.

Overall, it is considered that the trip rates to be associated with the proposal are unlikely to result in unacceptable harm, given the availability of non-car modes of transportation, including public transport and pedestrian routes. A robust travel plan can be secured through the use of a planning condition, which would include a strategy for encouraging the use of sustainable forms of transport, with measures included for the monitoring, review and revision of the strategy over time. The appropriate number and type of bicycle storage spaces can also be secured through the use of a planning condition.

It is suggested that the ancillary elements of the proposal, such as the bar, restaurant, and spa facilities might be limited in some way to reduce the trips likely to arise from their use, such as by limiting the number of covers within the restaurant. However, whilst these elements would be open to the public, they are primarily intended for the use of hotel guests. Given the potential for Torbay residents and other non-guests to access the site relatively easily on foot from the town centre, or from the railway station, by bus, or using taxis, planning officers are satisfied that such limitations are not required. In terms of the proposal's effects in relation to parking demand, this is discussed below.

Devon and Cornwall Police have raised concerns about the number of parking spaces proposed and the potential for this to cause overspill parking and conflict.

In relation to the provision of car parking, the Council's Strategic Transport Officer states that:

"... reading the transport policies collectively, it is possible to off-set the requirement for parking against other considerations and as such I find that any such resultant effect on the highway network would not be severe, and nor would it have a significant impact on safety. I accept the point raised by the Police in their representation that identifies potential conflicts with existing users of neighbouring streets but consider that from a transport perspective, on the basis that the NPPF clearly states that an application should only be refused on highway grounds where it raises significant safety or severe highway network impacts, an objection on parking grounds in this case cannot be justified. Any considerations specifically for crime and disorder would be separate."

Whilst the provision of parking spaces would fall short of the requirements of Policy TA3, the supporting text does explain that a site-specific approach will be taken. In this case the provision is consistent with that previously provided as a ratio and, in addition to the significant public transport availability and access to key pedestrian leisure routes, any potential impact on neighbouring streets or pedestrian safety in the vicinity of the site can be mitigated against. On balance therefore, it is considered that the proposal would not result in any unacceptable harm in relation to highway safety or amenity, subject to financial contributions

towards sustainable transport and local parking restrictions being secured, and conditions to secure a sustainable travel plan, a road safety audit, a car park management plan, and bicycle storage arrangements. The financial contributions would fund parking restrictions in nearby streets, including where the proposed loading bay would be sited, and railway improvements. The car park management plan would include measures to direct guests and other visitors towards alternative parking arrangements when spaces are unavailable at the site, including public car parks.

Concerns have been raised by residents about the proposed use of the loading bay to be located along Livermead Hill, particularly in relation to the types and sizes of vehicles that will use it, and the impact on highway safety. No loading bay is currently provided along this part of the public highway and refuse collections from the existing site result in lorries needing to stop in the highway. By providing a loading bay, it is considered that the proposal would be an improvement compared to the existing situation. The Council's Highways Engineers are satisfied that the loading bay can be designed in a manner that would not be harmful to highway safety, providing the vehicles using it do not exceed a certain size. Two-way traffic would continue along Livermead Hill whilst the loading bay is in use, and a pedestrian footpath would be provided alongside it. A condition is recommended to secure details of the proposed use and management of the loading bay to prevent it being used by unsuitably large vehicles.

The Council's Strategic Transport Officer raises no objections to the proposal, considering that it meets the requirements of the guidance contained in the NPPF, Policies TA1 and TA2 of the Local Plan, and relevant policies of the Torquay Neighbourhood Plan.

Subject to the use of the aforementioned conditions, the completion of a S106 legal agreement, and the provision of works to be secured through the completion of a Section 278 agreement, on balance, it is considered that the proposal would not result in unacceptable harm to highway safety or amenity, and that it would be in accordance with Policies TA1 and TA2 of the Local Plan, Policies TH9, THW5, THW6, and TTR2 of the Torquay Neighbourhood Plan, and the guidance contained in the NPPF.

8. S106

The Council's Strategic Transport Officer has advised that a financial contribution towards sustainable transport, namely Torquay Railway Station, will be required given that the proposal will, to some extent, rely on the railway. A contribution will also be required towards the provision of parking restrictions in the surrounding area, including where the proposed loading bay would be sited. The extent of any parking controls to be undertaken by the Council would normally be the subject of a Traffic Regulation Order and this is a separate statutory process, which would involve public consultation.

9. Other Considerations

Designing-Out Crime

The Police Designing-Out Crime Officer has raised concerns about the proposal in relation to its highways impact, and this is discussed above. Council officers are satisfied that, on balance, the proposal would not result in unacceptable harm to highway safety or amenity, subject to the use of conditions and the completion of a legal agreement. The potential for crime and disorder as a result of parking conflict is difficult to evidence; planning officers are satisfied that appropriate planning measures can be employed to reduce the potential for conflict as much as possible, bearing in mind that the site is located in a relatively accessible location with non-car options being available to future users. Ultimately, there is other legislation available to tackle anti-social behaviour.

Otherwise, no objections are raised subject to the use of a condition to secure a scheme of crime prevention measures, such as CCTV. It is recommended that this condition be imposed should planning permission be granted. Subject to the use of this condition, the proposal is considered to be in accordance with Policy SS11 of the Local Plan, and TH2 of the Torquay Neighbourhood Plan.

Railway Line

Network Rail have raised no objections to the proposal subject to the use of conditions and informatives to ensure that the proposed development would not result in any harm to the safety, operation, or integrity of the railway. The conditions are recommended requiring the approval of details in relation to demolition, piling, excavation and earthworks, and drainage, and these can be imposed should planning permission be granted.

Ground Contamination and Stability

The application is accompanied by a ground contamination report, with no contamination having been found. The Council's Community Safety officers have raised no objections to the proposal. Should planning permission be granted, a condition can be imposed requiring further action should contamination be found during the course of development. Subject to the use of this condition, the proposal is considered to be in accordance with Policy ER3 of the Local Plan.

The Council's Structural Engineer, and Network Rail, have requested details about the proposal's potential effects on the public highway and railway during the course of demolition and construction. Subject to the use of a suitable condition, the proposal is considered to be in accordance with Policy ER4 of the Local Plan.

Community Infrastructure Levy

The proposal is for the addition to/improvement of an existing tourist facility, Torbay Council collect CIL payments for new dwellings and for larger out-of-town/district centre retail and food and drink developments. Therefore the proposal would not be liable for a CIL payment.

Statement on Human Rights and Equalities Issues

Human Rights Act - The development has been assessed against the provisions of the Human Rights Act, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. This Act gives further effect to the rights included in the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests / the Development Plan and Central Government Guidance.

Equalities Act - In arriving at this recommendation, due regard has been given to the provisions of the Equalities Act 2010, particularly the Public Sector Equality Duty and Section 149. The Equality Act 2010 requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. Protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race/ethnicity, religion or belief (or lack of), sex and sexual orientation.

EIA

Due to its scale, nature and location this development would not have significant effects on the environment and therefore is not considered to be EIA development.

Proactive Working

In accordance with the requirements of Article 35(2) of the Town and Country Planning (Development Management Procedure) (England) Order, 2015, in determining this application, Torbay Council has worked positively with the applicant. The Council works with applicants/agents in a positive and proactive manner by:

- offering a pre-application advice service,
- as appropriate updating applications/agents of any issues that may arise in the processing of their application and where possible suggesting solutions.

In this case, concerns raised in relation to the proposal's overall scale and the adequate provision of parking spaces were addressed through revisions to the scheme, which reduced its overall size, and an increase in the number of parking spaces to be provided, which is complimented by proposed planning conditions and obligations seeking to enhance local access arrangements, encourage the use of sustainable means of transportation, and reduce the chances of overspill parking in the locality.

Conclusions

The proposal would result in the modernisation of the existing site, with a significantly improved hotel and leisure facility. It is considered that the proposal would deliver visual, economic, and regeneration benefits in what is a Core Tourism Investment Area, and none of the harm identified is considered sufficient to outweigh these benefits. Even in the absence of the aforementioned benefits, none of the harm identified is considered sufficient to warrant the refusal of planning permission, given the mitigating factors discussed. The proposal is considered to be acceptable, having regard to the Local Plan, Torquay Neighbourhood Plan, and all other material considerations, subject to the completion of a legal agreement and the use of planning conditions.

Condition(s)/Reason(s)

- 1) No development (including demolition and ground works) or vegetation clearance works shall take place until a Construction Method Statement has been submitted to and approved in writing by the Local Planning Authority. The Statement shall provide for:
 - a) A demolition method statement;
 - b) Details of any excavation, earthworks, or piling works including the method and equipment to be used;
 - c) The parking of vehicles of site operatives and visitors;
 - d) Loading and unloading of plant and materials;
 - e) Storage of plant and materials used in constructing the development;
 - f) The erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
 - g) Wheel washing facilities;
 - h) Measures to control the emission of dust, litter and dirt during construction;
 - i) Measures to minimise noise nuisance to neighbours from plant and machinery;
 - j) Construction working hours being limited to 0800hrs to 1800hrs Monday to Friday, 0800hrs to 1300hrs on Saturdays, and at no time on Sundays, Bank or Public Holidays.

The approved Statement shall detail the ways in which harm to the safety, use, and integrity of the public highway and railway will be prevented, and shall be adhered to throughout the construction period of the development.

Reason: To safeguard the Local Planning Authority's rights of control over these details to ensure that the construction works are carried out in an appropriate manner to minimise the impact on the amenity of neighbouring uses and in the interests of the convenience of highway users, having regard to Policies DE3, ER3, ER4, and TA1 of the Torbay Local Plan. These details

are required pre-commencement as specified to ensure that building operations and vegetation removal are carried out in an appropriate manner to avoid nuisance to neighbouring uses and inconvenience to highway users.

The use of a pre-commencement condition is considered appropriate in this case as environmental and highways controls, relating to the building phase of the development, need to be agreed before the construction process begins.

- 2) No development shall take place until a scheme of surface water drainage has been submitted to and approved in writing by the Local Planning Authority. The submitted details shall include measures to prevent interference with the safety, operation, and integrity of the railway. The development shall be undertaken in accordance with the approved details and shall be retained as such thereafter.

Reason: In the interests of sustainable drainage and in accordance with Policy ER1 of the Torbay Local Plan. These details are required pre-commencement as specified to prevent the installation of measures that might result in harm to the railway.

The use of a pre-commencement condition is considered appropriate in this case as surface water drainage measures may need to be incorporated into the development during the early stages of construction.

- 3) No development above damp proof course level shall take place until details of the proposed cladding materials (walls and roof) and openings have been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be constructed in accordance with the approved details, and shall be retained as such for the life of the development. All sections of new stone wall shall be constructed of natural stone laid on its natural bed and lime mortar. A sample panel shall be provided on site and agreed in writing by the Local Planning Authority prior to the construction of any new sections of wall.

Reason: To ensure a satisfactory form of development and to comply with Policy DE1 of the Torbay Local Plan, and Policy TH8 of the Torquay Neighbourhood Plan.

- 4) Prior to the first use of the development hereby approved, details of a lighting strategy relating to the illumination of the building, public realm and associated areas shall be submitted to and approved in writing by the Local Planning Authority. The submitted lighting strategy shall give particular consideration to preventing light intrusion at neighbouring properties, and in relation to bat habitats and flyways. The development shall thereafter be undertaken in accordance with the approved details and shall be retained as such indefinitely.

Reason: To ensure that the architectural quality of the building and its setting is highlighted through an appropriate scheme of lighting and to prevent harm to neighbouring occupiers and bats, and to comply with Policies DE1, DE3, and NC1 of the Adopted Local Plan, and Policy TE5 of the Torquay Neighbourhood Plan.

- 5) Prior to the first use of the development hereby approved, 5 Schwegler type 2F or similar bat tubes and 5 bird nesting boxes shall be installed (in accordance with manufacturer's instructions for correct siting and installation) on the new hotel and retained at all times thereafter, in-line with the mitigation measures outlined within the submitted Bat and Breeding Bird Survey.

Reason: To ensure that the development duly considers protected species and biodiversity, in accordance with Policy NC1 of the Torbay Local Plan 2012-2030, and Policy TE5 of the Torquay Neighbourhood Plan.

- 6) Notwithstanding the submitted landscaping details, prior to the first use of the hotel hereby approved, details of all proposed hard and soft landscaping shall have been submitted to and approved in writing by the Local Planning Authority. All planting, seeding or turfing comprised within the approved scheme shall be carried out in the first planting season following the completion of the development and any trees or plants which within a period of 5 years from completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next available planting season with others of a similar size and the same species. The approved hard landscaping details shall be provided within four weeks of the development being brought into use, and shall be retained for the life of the development.

Reason: In the interests of visual amenity and in accordance with Policy DE1 of the Adopted Torbay Local Plan 2012-2030.

- 7) Prior to the first use of the development hereby approved, a Travel Plan and Car Parking Management Strategy shall be submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall set out how at least 30% of the development's potential users can gain access by foot, cycle or public transport, and how this will be implemented and monitored including SMART targets and an annual review. The Travel Plan shall be continually monitored by a Travel Plan Coordinator (TPC) appointed to ensure that it meets its objectives and targets. In the event that the objectives and targets of the Travel Plan are not met, the Travel Plan shall be updated by the TPC setting out further measures in order to rectify this. A copy of the Travel Plan or updated Travel Plan, shall be made available to the Local Planning Authority upon request during normal business hours and the contact details of the TPC shall be provided in all iterations of the Travel Plan. The Car Parking Management Strategy shall include details of car parking allocation including

details of staff and visitor parking, along with the proposed measures for accommodating guest and visitor vehicles when the on-site car park is at full capacity. The development shall, at all times, be operated in accordance with the approved details.

Reason: In the interests of road safety and sustainability to encourage walking, cycling and public transport use by staff and visitors in accordance with policies TA1 and TA2 of the Torbay Local Plan 2012-2030, and Policy THW1 of the Torquay Neighbourhood Plan.

- 8) Prior to the first use of the development hereby approved, a road safety audit shall be submitted to and approved in writing by the Local Planning Authority, detailing the proposed measures for ensuring pedestrian and other road-user safety along the public highway around the site. The approved measures shall be implemented in full prior to the first use of the development.

Reason: To provide safe and sustainable highway arrangements in accordance with Policies TA1, TA2 and DE1 of the Torbay Local Plan.

- 9) Prior to the first use of the development hereby approved, the parking facilities, manoeuvring areas, and electric charging points shown on the approved plans shall be provided and thereafter permanently retained for the use of vehicles associated with the development.

Reason: To ensure adequate parking facilities are provided to serve the development in accordance with policy TA2 and TA3 (and associated appendix F) of the Torbay Local Plan 2012-2030.

- 10) The development hereby approved shall not be brought into use until a Section 278 Highways Agreement has been entered into in order to secure the necessary works to the public highway, as indicated on the approved plans. The development shall not be brought into use until the approved S278 works have been completed to the satisfaction of the Local Highway Authority.

Reason: To provide safe and sustainable access to the site for drivers, cyclists and pedestrians in accordance with Policies TA1, TA2 and DE1 of the Torbay Local Plan.

- 11) Prior to the first use of the development hereby approved, details of signage in relation to the proposed access and egress arrangements shall be submitted to and approved in writing by the Local Planning Authority. The southern vehicular access point shall be used as an entrance only, and the northern egress point shall be used for exiting the site only. The approved signage shall be installed prior to the first use of the development, and shall be permanently retained thereafter.

Reason: To provide safe and sustainable access to the site for drivers, cyclists and pedestrians in accordance with Policies TA1, TA2 and DE1 of the Torbay Local Plan.

- 12) Prior to the first use of the development hereby approved, a scheme of boundary treatment shall be fully installed in accordance with details which shall previously have been submitted to and agreed in writing by the Local Planning Authority. Once provided, the agreed boundary treatment shall be retained for the life of the development.

Reason: In interests of visual and residential amenity and in accordance with Policy DE1 of the Adopted Torbay Local.

- 13) Prior to the first occupation of the development hereby approved, the refuse and recycling facilities shown on the approved plans shall be provided. Once provided, the agreed storage arrangements shall be retained for the life of the development.

Reason: In interests of visual amenity and in accordance with Policy DE1 of the Adopted Torbay Local Plan.

- 14) The use of the proposed loading bay at Livermead Hill, including all deliveries and collections, shall be limited to the hours of 0800hrs to 1800hrs Monday to Friday, and 0800hrs to 1300hrs on Saturdays. No such deliveries or collections shall take place on Sundays, Bank, or Public Holidays.

Reason: To protect neighbouring occupiers from noise disturbance in accordance with Policy DE3 of the Torbay Local Plan.

- 15) The development hereby approved shall not be brought into use until details of the means of ventilation for the extraction and dispersal of cooking smells/fumes, including details of its method of construction, odour control measures, noise levels, its appearance and finish have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be installed before the use hereby permitted commences and thereafter shall be permanently retained.

Reason: To protect neighbouring occupiers from noise disturbance in accordance with Policy DE3 of the Torbay Local Plan.

- 16) The development hereby approved shall not be brought into use until an assessment to show that the rating level of any plant and equipment, to be installed as part of this development, will be at least 5 dB below the background level has been submitted to and approved in writing by the Local Planning Authority. The assessment must be carried out by a suitably qualified acoustic consultant/engineer and be in accordance with BS4142: 2014 (methods for

rating and assessing industrial and commercial sound). All plant installed shall be operated in accordance with the approved details for the life of the development.

Reason: To protect neighbouring occupiers from noise disturbance in accordance with Policy DE3 of the Torbay Local Plan.

- 17) Prior to the first use of the development hereby approved, a scheme of measures to protect the privacy of neighbouring occupiers shall be submitted to and approved in writing by the Local Planning Authority. The submitted measures shall include obscure glazing and privacy screens in relation to openings, balconies, and terraces that may permit overlooking towards neighbouring properties, particularly those located to the south and north. The approved measures shall be fully installed prior to the first use of the development and shall thereafter be retained for the life of the development.

Reason: To protect neighbouring occupiers from unacceptable levels of overlooking, in accordance with Policy DE3 of the Torbay Local Plan.

- 18) No access to the roof-top terrace shall be allowed between the hours of 2200hrs and 0800hrs daily, and no audio equipment shall be used in this outdoor area at any time.

Reason: To protect neighbouring occupiers from noise disturbance in accordance with Policy DE3 of the Torbay Local Plan.

- 19) Prior to the first use of the development hereby approved, a scheme of measures for designing-out crime shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be fully installed prior to the first use of the development and shall be permanently retained thereafter.

Reason: In the interests of amenity and preventing opportunities for criminal activity, in accordance with Policies DE1 and DE3 of the Torbay Local Plan and Policy TH2 of the Torquay Neighbourhood Plan.

- 20) Should any contamination be found during the course of the development, all construction works shall cease until such time as a scheme of remediation has been submitted to and approved in writing by the Local Planning Authority. The development shall then proceed in full accordance with the approved details.

Reason: In the interests of addressing potential contamination in accordance with Policy ER3 of the Torbay Local Plan.

- 21) Prior to the first use of the development hereby approved, a loading bay management strategy shall be submitted to and approved in writing by the

Local Planning Authority. The submitted strategy shall provide details of the vehicle types and sizes that will make use of the loading bay, and the proposed measures to prevent vehicles waiting in the highway. The loading bay shall thereafter be used in strict accordance with the approved details, for the life of the development.

Reason: In the interests of highways safety and amenity, and in accordance with Policies TA1 and TA2 of the Torbay Local Plan.

- 22) Prior to the first use of the development hereby approved, bicycle storage shall be provided in accordance with details that have previously been submitted to and approved in writing by the Local Planning Authority. The bicycle storage shall be retained for the life of the development.

Reason: In the interests of sustainable transport and in accordance with Policies TA1, TA2, and TA3 of the Torbay Local Plan, and Policy THW6 of the Torquay Neighbourhood Plan.

Informative(s)

01. Town and Country Planning (General Development Procedure) (Amendment) Order 2003. The proposed development has been tested against the following policies of the Development Plan and, in the opinion of the Local Planning Authority, is not in conflict with the following policies:
02. All bats are protected by law. If bats are found, works must immediately cease and further advice be obtained from Natural England and / or a licensed bat consultant. Works must not resume until their advice has been followed. Nesting birds are also protected by law. During site clearance and construction works, suitable safeguards must be put in place to prevent threat of harm to legally protected species, including nesting birds and reptiles all of which are protected under the Wildlife & Countryside Act 1981 (as amended). Where works are to involve cutting or clearance of shrubs, hedges or other vegetation, which can form nesting sites for birds, such operations should be carried out at a time other than in the bird breeding season (which lasts between 1 March - 15 September inclusive in any year). Further details can be obtained from a suitably qualified and experienced ecological consultant, or please refer to published Natural England guidelines for protected species.
03. Raliway

SAFETY

Any works on this land will need to be undertaken following engagement with Asset Protection to determine the interface with Network Rail assets,

buried or otherwise and by entering into a Basis Asset Protection Agreement, if required, with a minimum of 3months notice before works start. assetprotectionwestern@networkrail.co.uk

SITE LAYOUT

It is recommended that all buildings be situated at least 2 metres from the boundary fence, to allow construction and any future maintenance work to be carried out without involving entry onto Network Rail's infrastructure. Where trees exist on Network Rail land the design of foundations close to the boundary must take into account the effects of root penetration in accordance with the Building Research Establishment's guidelines.

SIGNALLING

The proposal must not interfere with or obscure any signals that may be in the area.

NOISE

Network Rail would remind the council and the applicant of the potential for any noise/ vibration impacts caused by the proximity between the proposed development and the existing railway, which must be assessed in the context of the National Planning Policy Framework (NPPF) and the local planning authority should use conditions as necessary.

The current level of railway usage may be subject to change at any time without prior notification including increased frequency of trains, night time train running and heavy freight trains.

There is also the potential for maintenance works to be carried out on trains, which is undertaken at night and means leaving the trains' motors running which can lead to increased levels of noise.

LANDSCAPING

It is recommended no trees are planted closer than 1.5 times their mature height to the boundary fence. The developer should adhere to Network Rail's advice guide on acceptable tree/plant species. Any tree felling works where there is a risk of the trees or branches falling across the boundary fence will require railway supervision.

PLANT, SCAFFOLDING AND CRANES

Any scaffold which is to be constructed adjacent to the railway must be erected in such a manner that, at no time will any poles or cranes over-sail

or fall onto the railway. All plant and scaffolding must be positioned, that in the event of failure, it will not fall on to Network Rail land.

LIGHTING

Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway.

SAFETY BARRIER

Where new roads, turning spaces or parking areas are to be situated adjacent to the railway; which is at or below the level of the development, suitable crash barriers or high kerbs should be provided to prevent vehicles accidentally driving or rolling onto the railway or damaging the lineside fencing.

Relevant Development Plan Policies

Torbay Local Plan

DE1 – Design
ER1 – Flood Risk
ER2 – Water Management
NC1 - Protected sites - internationally import
TO1 - Tourism, events and culture
TA2 - Development access
TA3 - Parking requirements
DE4 - Building heights
DE3 - Development Amenity
C4 - Trees, hedgerows and natural landscape
SS1 - Growth Strategy for a prosperous Torbay
SS4 - The economy and employment
SS11 – Sustainable Communities
TC5 - Evening and night time economy

Torquay Neighbourhood Plan

TS4 - Support for Brownfield and Greenfield development
TH2 - Designing out crime
TH8 - Established architecture
TH9 - Parking facilities
TE1 - Tourism accommodation on brownfield sites

TE5 - Protected species habitats and biodiversity

TE7 – Marine Management Planning

THW1 - Travel Plans

THW5 - Access to sustainable transport

THW6 - Cycle storage and changing facilities

TTR2 - Sustainable Communities