

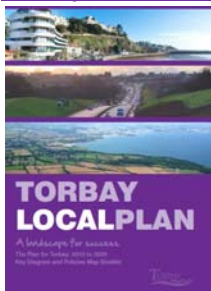
neighbourhood plans

From: Brooks, Tracy
Sent: 18 December 2017 09:00
To: neighbourhood plans
Subject: FW: Neighbourhood Plan Response
Attachments: TDA response to Brixham Peninsula Neighbourhood Plan (Town Centre Regeneration).docx; ATT00001.htm; TDA response to Paignton Neighbourhood Plan.docx; ATT00002.htm; TDA response to Torquay Neighbourhood Plan.docx; ATT00003.htm

Tracy Brooks
Senior Strategy and Project Officer
Strategy & Project Delivery,
Spatial Planning,
Torbay Council
2nd Floor, Electric House, Castle Circus, Torquay, TQ1 3DR
Tel: 01803 208813
E mail: tracy.brooks@torbay.gov.uk
Web site: www.torbay.gov.uk/newlocalplan

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[Torbay Local Plan 2012 to 2030 Published](#)



Torbay Council has published its new Local Plan which forms part of the development plan for Torbay and provides the basis for decisions on spatial planning within Torbay up to 2030.

The Torbay Local Plan 2012 to 2030 – A landscape for success can be [viewed online](#) or purchased as a hard copy or USB memory card. Card payments will be accepted via 01803 207801 quoting the 'new Local Plan'.

From: Steward, Pat
Sent: 18 December 2017 08:27
To: Future Planning <Future.Planning@torbay.gov.uk>
Cc: Brooks, Tracy <Tracy.Brooks@torbay.gov.uk>; Gunther, Andrew <Andrew.Gunther@torbay.gov.uk>; Pickhaver, David <David.Pickhaver@torbay.gov.uk>
Subject: FW: Neighbourhood Plan Response

Tracy, Andrew, David

I sent this last night – but there was a typo in the e-mail address!

Please see e-mail below.

Pat

Pat Steward
Town Centre Regeneration Programme Director
TDA
3rd Floor, Tor Hill House
Union Street

Torquay
TQ2 5QW
Tel [01803 208918](tel:01803208918)
Mob [07768130814](tel:07768130814)

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From: Steward, Pat
Sent: 17 December 2017 22:41
To: future.planning@torbay.gov.uk
Cc: Denby, Alan; Steward, Pat
Subject: Fwd: Neighbourhood Plan Response

Tracy / David / Andy

Attached are my responses, purely from a town centre regeneration perspective, to the three submitted neighbourhood plans.

Whilst these responses are submitted on time, I reserve the right to modify the responses before they are publicised. You will be fully aware of the sensitivities around Neighbourhood Plans and previous representations, on the Council's behalf. I want to ensure that the TDA makes its view clear, but in as positive a way as possible and as consistently as possible.

To that extent, I will catch up with others in the TDA and with Alan Denby about the nature of the TDA's responses and get back to you within the next 2 days.

Please do not publicise the responses until I have confirmed.

Many thanks

Pat

Pat Steward
Director - Town Centre Regeneration
TDA
T: 07768130814

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Begin forwarded message:

of Torbay Economic Development Company Limited, a company registered in England and Wales No. 7604855 Registered Office Tor Hill House, Union Street, Torquay, Devon TQ2 5QW

Begin forwarded message:

From: "Pickhaver, David" <David.Pickhaver@torbay.gov.uk>
To: "Lang, Susanne" <susanne.lang@tedcltd.com>, "Palmer, Paul" <Paul.Palmer@tedcltd.com>, "Wyard, Carl" <carl.wyard@tedcltd.com>
Cc: "Talbot, Clare" <Clare.Talbot@tedcltd.com>, "Poston, Samantha"

<Samantha.Poston@tedcltd.com>, "Steward, Pat"

<pat.steward@tedcltd.com>, "Luscombe, Adam"

<Adam.Luscombe@torbay.gov.uk>

Subject: FW: Neighbourhood Plan Response

Hi all

Just a reminder that the deadline for comments on the Neighbourhood Plans in Monday 18th December at 9.00 AM. Because of specific circumstances, it is unlikely that we will be able to accept late responses which means that the deadline is effectively close of play on Friday 15th.

When “made” (i.e. adopted) the Neighbourhood Plans will carry more weight than the Local Plan on non-strategic matters and will be the legal basis for making planning decisions.

I’ve attached Torbay Council’s Draft response on Paignton as Local Planning Authority (note that this still needs Kevin Mowat’s approval). This touches on some matters that the TDA may wish to comment on behalf of Torbay as a landowner/ regeneration agency etc: but it is important that the TDA makes its own views known.

The submitted Plans and how to respond are at
<http://www.torbay.gov.uk/neighbourhood-plans>

Thanks

Kind regards

David

David Pickhaver

Senior Strategy and Project Officer

Strategic Planning

Spatial Planning

Torbay Council

Postal address: Electric House, Castle Circus ,Torquay,TQ1 3DR

Tel: 01803 208814

Fax: 01803 208882

E mail:

David.Pickhaver@torbay.gov.uk<<mailto:David.Pickhaver@torbay.gov.uk>>

Web site: www.torbay.gov.uk/newlocalplan<<http://www.torbay.gov.uk/ldf>>

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From: Pickhaver, David

Sent: 06 December 2017 17:12

To: Luscombe, Adam <Adam.Luscombe@torbay.gov.uk>; Kunaszkievicz, Zdzislawa <Zdzislawa.Kunaszkievicz@torbay.gov.uk>; Brooks, Tracy

<Tracy.Brooks@torbay.gov.uk>; Blackwell, Jim
<Jim.Blackwell@torbay.gov.uk>; Shimin, Ashwag
<Ashwag.Shimin@torbay.gov.uk>; Gunther, Andrew
<Andrew.Gunther@torbay.gov.uk>; Addison, Helen
<Helen.Addison@torbay.gov.uk>
Subject: RE: Neighbourhood Plan Response

Dear all

Please see proposed response to Paignton Neighbourhood Plan (version 1.1 incorporating Tracy's initial comments). As you know we need to get a version to Kevin on 11th so please can I have any comments by 12pm on Monday 11th

Thanks
Kind regards
David

David Pickhaver
Senior Strategy and Project Officer
Strategic Planning
Spatial Planning
Torbay Council
Postal address: Electric House, Castle Circus ,Torquay,TQ1 3DR
Tel: 01803 208814
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David.Pickhaver@torbay.gov.uk<<mailto:David.Pickhaver@torbay.gov.uk>>
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From: Pickhaver, David
Sent: 06 December 2017 11:03
To: Luscombe, Adam
<Adam.Luscombe@torbay.gov.uk<<mailto:Adam.Luscombe@torbay.gov.uk>>>; Kunaszkievicz, Zdzislawa
<Zdzislawa.Kunaszkievicz@torbay.gov.uk<<mailto:Zdzislawa.Kunaszkievicz@torbay.gov.uk>>>; Brooks, Tracy
<Tracy.Brooks@torbay.gov.uk<<mailto:Tracy.Brooks@torbay.gov.uk>>>;
Blackwell, Jim
<Jim.Blackwell@torbay.gov.uk<<mailto:Jim.Blackwell@torbay.gov.uk>>>;
Shimin, Ashwag
<Ashwag.Shimin@torbay.gov.uk<<mailto:Ashwag.Shimin@torbay.gov.uk>>>;
Gunther, Andrew
<Andrew.Gunther@torbay.gov.uk<<mailto:Andrew.Gunther@torbay.gov.uk>>>

>
Subject: RE: Neighbourhood Plan Response

Dear all
Please see my draft comments on the Submitted Paignton Neighbourhood Plan.

Kind regards
David

From: Luscombe, Adam
Sent: 24 November 2017 12:29
To: Kunaszkiwicz, Zdzislawa
<Zdzislawa.Kunaszkiwicz@torbay.gov.uk<<mailto:Zdzislawa.Kunaszkiwicz@torbay.gov.uk>>>; Brooks, Tracy
<Tracy.Brooks@torbay.gov.uk<<mailto:Tracy.Brooks@torbay.gov.uk>>>;
Blackwell, Jim
<Jim.Blackwell@torbay.gov.uk<<mailto:Jim.Blackwell@torbay.gov.uk>>>;
Pickhaver, David
<David.Pickhaver@torbay.gov.uk<<mailto:David.Pickhaver@torbay.gov.uk>>>
>; Shimin, Ashwag
<Ashwag.Shimin@torbay.gov.uk<<mailto:Ashwag.Shimin@torbay.gov.uk>>>
>; Gunther, Andrew
<Andrew.Gunther@torbay.gov.uk<<mailto:Andrew.Gunther@torbay.gov.uk>>>
>

>
Subject: Neighbourhood Plan Response

Hi All

So that we are all aware of the response dates and the consultation “programme”, below are the key dates:

1/12/17	Draft Response
1/12/17-6/12/17	All team to review, any comments appreciated
7/12/17-8/12/17	Modifications following feedback
11/12/17	Submit to Kevin
11/12/17-13/12/17	Final Checks
14/12/17-15/12/17	Final Responses

Must be submitted before close of play on 15th December. I don't expect or want anyone having to work on this over the weekend of the 16th and 17th, nor take the chance having to submit prior to 09:00 on 18th.

Thanks

Adam.
Adam Luscombe
Team Leader, Strategy and Project Delivery
Torbay Council, 2nd Floor Electric House, Castle Circus, Torquay, Devon,
TQ1 3DR<x-apple-data-detectors://1/0>
01803 207693<<tel:0180320207693>>
07920 247651<<tel:0792020247651>>

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Sent from my iPad

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Paignton Neighbourhood Plan (Submission version 2017)

Introduction

This brief statement covers the views of the TDA, only in relation to its role as adviser to the Council on delivery of town centre regeneration.

The TDA acknowledges all the hard work that the Neighbourhood Forum, as volunteers, has put into the Submitted Neighbourhood Plan.

However, the TDA is concerned that the Neighbourhood Plan policies are not based on a good understanding of the nature of the local economy, where development land values can be negative, or on the views of investors and developers, who are nervous about investing or developing in Torbay, in large part because of viability. Consequently, a number of policies place unreal and unacceptable requirements on new development – including development in town centres – that will simply further dissuade investors and developers. Unless these requirements are moderated or removed then the sustainable growth aspirations of the Local Plan, Economic Strategy and Neighbourhood Plan are unlikely to be realised, especially in relation to employment growth and new homes in town centres. The very things the community, Council, TDA and Neighbourhood Forum really want to see delivered, such as more jobs and more homes in town centres, simply won't be delivered because of the nature of some policies.

In April 2017 Torbay Council agreed a Transformation Strategy for Torbay's Town Centres – see

<http://www.torbay.gov.uk/DemocraticServices/documents/s38324/Transformation%20Project%20Town%20Centre%20Regeneration%20Appendix%201.pdf>

The Transformation Strategy relates to the three town centres in Torbay, including Brixham. The Transformation Strategy was informed by the town centre masterplans for Torquay and Paignton, which were adopted as Supplementary Planning Documents by the Council in July 2015, and by the concept plan produced by the Brixham community for Brixham Town Centre Car Park. The Transformation Strategy is an appendix to the Economic Strategy and complements the Local Plan.

The Transformation Strategy for Torbay's Town Centres sets out a very clear, market focused approach to successful town centre regeneration over a ten year period. The Strategy sets out a vision for town centres. It identifies a number of sites and projects that make up the first phase of town centre regeneration. These are predominantly Council owned sites and the projects relate to Council owned land. This reflects the fact that investors and developers are nervous about investing in Torbay, for a number of reasons including viability and confidence in Torbay's performance. Consequently the Council has set out, in the Transformation Strategy, that it will lead on the delivery of Phase 1 of the Transformation Strategy, by direct delivering development on its own sites. The intention is to build confidence in investors and developers, in order to deliver the second phase of town centre regeneration.



The vision, as set out in the Transformation Strategy, for Paignton over the next 10 years is as follows:

“In Paignton, given the lack of market investment a more interventionist approach is proposed, but with much the same outcomes as Torquay - more people living and working in town centre, which may involve loss of some secondary retail space; improve public realm and physical fabric, especially around the rail and bus station area and main road / pedestrian junctions; better connecting the community with the coast, the town centre and harbour.

As with Torquay, a key outcome of regeneration will be connecting the community with the coast – better linking Winner Street with the sea front and the Harbour. Improvements to the public realm, especially at key junctions, and improvements to building frontages will restore some of the historic character of Paignton, improving consumer experiences. This will ensure the town centre is more legible, with easier movement around the town and people will be encouraged to enjoy the whole town centre experience – from the Esplanade to Winner Street.

A new civic heart to the town will be created, logically, between the two stations and the library. This will include residential and commercial space and new civic facilities such as health provision. This will complement the refurbishment of the old Paignton Cinema and the steam railway operation. It will enhance the linkage between Torbay Road and Victoria Street. Paignton Harbour will become more of a destination, not a hidden jewel, whilst also retaining its charm. Existing leisure activities will be complemented by more people living in the area and a better café/restaurant offer.

The redevelopment of Crossways, in the short term, and of the Victoria Centre, probably over the longer term, will add more vitality and vibrancy to the town centre. Winner Street will benefit from increased footfall and investment, but may well need further funding and support.”

The Transformation Strategy identifies a number of sites and projects in Paignton Town Centre, as part of the delivery of Phase 1 of town centre regeneration. These sites and projects are:

- Victoria Centre
- Paignton Civic Hub (the area around the train and bus stations and Paignton Library)
- Paignton Harbour, South Quay
- Crossways
- Public Realm improvements to the Station Square area (Victoria Street, Torbay Road) and to the top end of Victoria Street.

Since adoption, by the Council in April 2017, of the Transformation Strategy for Town Centres as part of the Economic Strategy, progress has been made on these sites and projects, in difficult economic conditions, in accordance with the actions set out in the Transformation Strategy. For example:

- The Council has set up a £25m Town Centre Regeneration Fund, to deliver a range of projects across Torquay and Paignton (see <http://www.torbay.gov.uk/DemocraticServices/documents/s43850/104%20Town%20Centre%20Regeneration%20191017.pdf>)
- The TDA has assessed development options for South Quay, Paignton Harbour, and assessed viability; it has met with existing tenants to better understand their requirements; it has assessed market demand. On that basis the Council agreed, in October 2017, to seek a development partner for the site (see <http://www.torbay.gov.uk/DemocraticServices/documents/s43552/Town%20Centre%20Regeneration%20Programme%20Fund%20App2.pdf>)
- The TDA has developed concept plans for public realm improvements around Victoria St / Torbay Rd; these have been costed; the Council has agreed an outline business plan for the delivery of public realm improvements (see <http://www.torbay.gov.uk/DemocraticServices/documents/s43554/Town%20Centre%20Regeneration%20Programme%20Fund%20App4.pdf>)
- The TDA has worked with the owner and potential developers of Crossways; we will continue to do so until a viable development option is available and presented, as a planning application, to the Council.
- The TDA continues to work with Lidl at Victoria Centre, to understand its future needs; we are working with developers and investors, alongside Jones Lang Lasalle, to assess and meet demand and to assess viability.
- The TDA continues to work with other owners of land at Paignton Civic Hub, to develop a shared approach to redevelopment; we continue to work with developers and investors, alongside Jones Lang Lasalle, to assess and meet demand and to assess viability.

Consequently the TDA is in an extremely good position to advice on developer / investor interest, on viability of development and the risks to successful delivery of development.

As such the TDA makes the following comments about the policies in the submitted Neighbourhood Plan:

PNP2 – Town Centre

This policy is supported in principle, but some of the requirements of the Design Guide (Annex 2 to PNP1) will have a negative impact on viability. Consequently, flexibility in the application of the design guide is required to ensure that the wider benefits of town centre regeneration are recognised and can be delivered, even if a proposal does not meet all the requirements of the Design Guide.

PNP3 – Paignton Harbour

This policy is supported in principle, but some requirements of the policy need moderating. The requirement to improve (and by implication retain) retain off-street parking spaces, even where such parking spaces are evidently under-utilised, is unacceptable. The Plan could,



for example, require provision of better quality parking elsewhere in place of retaining / improving existing parking.

PNP5 – Torbay Road

This policy is supported in principle, but the requirement for new development to pay for improvements to existing buildings / features in Torbay Road is likely to be unviable. Instead the plan should refer to the need for S106 monies (from major development) to contribute, reasonably, to such improvements and for S106 receipts to be used to help lever in other funding, for example from property owners and tenants, from Historic England and from other funding bodies / sources.

PNP6 – Station Square Gateway

This policy is supported in principle, but again the policy is worded as an ‘all or nothing’ policy. Flexibility is needed to allow businesses and the community to benefit from public realm and transport improvements that may not meet all the requirements of the policy, but achieve substantial benefits to the town.

PNP7 – Victoria Square

The intentions of the policy, to achieve redevelopment, are supported in principle. But the requirement to retain / replace all existing off-street parking is overly onerous and does not reflect evidence of substantial under-use of parking spaces at Victoria Square. Additionally, the requirement not to lose any public space is onerous, when the objective should be to achieve better quality public space that helps to link different parts of the town.

PNP8 – Crossways, Hyde Road and Torquay Road

The TDA welcomes the Neighbourhood Plan’s support for redevelopment of Crossways. The community’s number one priority has been to see this site redeveloped. However, the requirements to focus on re-use for retail purposes, retain secondary retail frontage along the Hyde Rd part of the site, and retain the pedestrian link through the site (when other alternatives could be secured) are highly likely to prohibit much needed redevelopment and are considered unnecessary. The policy needs to take a much more flexible approach, to allow a high quality redevelopment to come forward. The Neighbourhood Plan needs to define what the town centre really needs (e.g. a commercial or retail space on Torquay Road, to support that part of the town centre) rather than what it would like to see. The latter approach is highly likely to result in no redevelopment of Crossways.

PNP13 – Housing opportunities with the town centre

The TDA supports the over-arching objective of more people living in Paignton Town Centre, but objects to this policy because of criteria c). The requirements of criteria C of the policy significantly undermine the chances of delivering the objective of the policy – to deliver more homes in the town centre. The requirements are highly likely to make residential or mixed use redevelopment of sites unviable in Paignton town centre. Developers and investors will simply not bring such development forwards, because of viability. Consequently no or very



little new housing will be delivered and there will be even less affordable housing available from within the existing stock, as demand for homes will outstrip supply and prices of existing homes will increase.

PNP 16 – Victoria Street

Once again, the over-arching objective of this policy is supported, but the Plan needs to be clear about how it supports and will deliver more efficient use of vacant floor space at upper levels to facilitate residential use. Without that clarity it is difficult to understand how this part of the policy will be delivered.

Pat Steward

Town Centre Regeneration Programme Director

TDA