

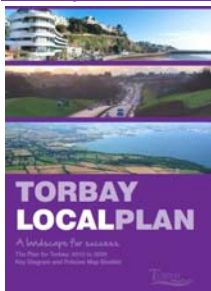
neighbourhood plans

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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Torquay 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 some Neighbourhood Plan policies are not based on a good understanding of the nature of the local economy, where development land values can be low, or on the views of investors and developers, who are nervous about investing or developing in Torbay, in large part because of viability. The Neighbourhood Plan is not as up to date as it could be, specifically in relation to the progress the Council and TDA have made, on the community's behalf, to deliver successful town centre regeneration.

Consequently, a number of policies place unreal and unacceptable requirements on new development – including development of sites in town centres – that will simply further dissuade investors and developers and set back plans for town centre regeneration. 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 Torquay over the next 10 years is as follows:

“In Torquay, the approach to regeneration is more focused on supporting market delivery; providing a more aspirational retail offer at the lower end of the high street and around the harbour; providing more of a leisure and retail offer from Market Street to the lower end of the Fleet Street; retaining some of the larger retail space to the upper end of Union Street, but encouraging more homes, office space and leisure space; more residents and workers in the town centre; more visitors in the town centre; improved townscape and access; better quality / more accessible parking.

The River Fleet has played a significant role in Torquay’s history, but is now hidden beneath buildings and streets. Its identity has been lost. The regeneration of the town centre provides an opportunity to recognise its role, through wayfinding, place marketing, culture, public space improvements etc. It is not intended to expose the underground river, but to raise awareness of its presence and role. It could, once again, provide a role in connecting the community with the coast. This connection, along Union Street/Fleet Street, will be enhanced by removal of a lot of the existing street clutter (such as signs that have no function), improvements to public realm and to building frontages. This will ensure the town centre is more legible, easier to understand and navigate, which will make a significant improvement to consumer experience.

The upper end of Union Street, between Market Street and the Town Hall, needs to become more diverse and vibrant, with less small retail space. The market is already promoting that sort of diversity, as occupation by WBW Solicitors helps to demonstrate. This area should continue to provide space to meet the needs of larger stores, such as at Union Square, Boots, the former BHS, but otherwise the Council will incentivise and enable more residential, office space, leisure, cafes and restaurants. In line with the civic nature of this area, the Council will also encourage and enable use of buildings and space for civic uses – which could include a library service and public health provision for example. The character and liveliness of this area will be enhanced by the presence of students and by improved quality of car parking at Lower Union Lane. The Council will support the presence, expansion and value of language schools in this area. These types of uses should encourage more footfall, more spend and ensure this “Upper Fleet” area becomes an area in which people want to spend time. The Lower Union Lane area provides opportunities for comprehensive redevelopment, over the longer term.

The largely pedestrianised area between Market Street and Fleet Walk – the “Lower Fleet” area - will provide the retail focus, particularly towards the lower end, but this will be better blended with an improved leisure offer, living and working space and new retail opportunities. The area around Pimlico provides opportunities for comprehensive redevelopment, that could include more leisure uses (such as a cinema), and for re-use of upper floors for residential purposes.



The Harbour area, one of Torbay's unique selling points, will see more aspirational and/or independent retailers – those not yet present in Torquay. The Council may have to purchase property to provide space, at the right time, to those retailers, as part of a package of incentives for investment. The Harbour will have a high quality food and drink offer and a good leisure offer. This will be encouraged and complemented by high quality public space.

Abbey Road and Market Street will benefit from this investment, better consumer experience and increased patronage.”

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

- Upton Place (part of Torquay Town Hall Car Park)
- Harbour View (part of Terrace Car Park)
- Lower Union Lane Multi Storey Car Park
- Five public realm improvements, between the town hall and the harbour, to improve people's experience of the town centre and encourage investment.

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 agreed, in May 2017, to fund, design and build student accommodation at Upton Place – to bring new footfall and spend to the town centre and to support a local education provider (see <http://www.torbay.gov.uk/DemocraticServices/documents/s39464/02%20Upton%20Place%20-%20Report%20to%20Council%20-%20Final.pdf>).
- 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, on the Council's behalf, assessed development options for Harbour View, and assessed viability; On that basis the Council agreed an outline business case, in October 2017, to fund, design and build a hotel on the site (see <http://www.torbay.gov.uk/DemocraticServices/documents/s43551/Town%20Centre%20Regeneration%20Programme%20Fund%20App1.pdf>)
- The TDA has, on the Council's behalf, reviewed the options for refurbishment of Lower Union Lane Multi Storey Car Park. On that basis the Council agreed an outline business case, In October 2017, to fund, design and deliver improvements to the Car Park (see <http://www.torbay.gov.uk/DemocraticServices/documents/s43553/Town%20Centre%20Regeneration%20Programme%20Fund%20App3.pdf>)



- The TDA has, on the Council's behalf, developed concept plans for public realm improvements around Castle Circus and The Strand / Fleet St; these have been costed.

Consequently the TDA is in an extremely good position to advise 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:

Objective - Torquay town centre

The TDA supports the Plan's objectives, as set out on page 6 of the Plan, for the town centre.

Policy S3 – Master Plans

The masterplan for Torquay Town Centre was prepared, with significant community and business engagement, around 3 years ago. The masterplan was adopted as a Supplementary Planning Document by the Council in July 2015. The Local Plan, adopted in December 2015, was informed and influenced by the town centre masterplan – but was not slavish to it. The Local Plan took a more flexible approach to the sites (and their potential uses) included in the masterplan, recognising that developer / investor requirements, site requirements and local / national economic conditions will all change over time. There has been considerable change and progress since the town centre masterplan for Torquay was prepared. The Neighbourhood Plan should not require complete compliance with the town centre masterplan, given it was prepared so long ago. There will be a significant negative impact on town centre regeneration, and on specific developments that make a substantial contribution to town centre regeneration and economic regeneration, if this policy is included in the Neighbourhood Plan. Consequently the TDA objects to this policy.

Policy S4 – Community led planning

The TDA supports the need for, and values, community input to major development proposals. However, a decision on a major development proposal must be made in accordance with the development plan, unless material considerations indicate otherwise. A policy in a Neighbourhood Plan cannot require that a decision on a major application is made in accordance with the views of a Community Partnership, as that decision could then be unlawful. Consequently the TDA objects to this policy.

Policy H5 – Affordable Housing

The TDA supports the over-arching objective of the Neighbourhood Plan for more people to live in Torquay Town Centre, but objects to this policy because the requirements of the policy significantly undermine the chances of delivering the objective of the plan. The requirements are highly likely to make residential or mixed use redevelopment of sites unviable in Torquay 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. The outcome of this policy will, as such, be contrary to one of the key objectives of the Plan to support town centre regeneration. Consequently the TDA objects to this policy.

Policy H11 – Minimum bedrooms

The TDA can understand the intentions behind this policy, namely that there should be minimum space standards for residential accommodation. But the policy as proposed goes beyond setting a minimum space standard. There is a risk that studio and micro-apartments, that meet the needs of young or first time buyers, will be prevented by the policy – to the detriment of the local economy. The TDA suggest that the space standards included within the current local plan do not need to be refined by the Neighbourhood Plan.

Policy H13 – Established architecture

There are two risks with the policy as currently written. Firstly it could discourage innovation in design, when such innovation can be important in delivering viable and exciting town centre regeneration projects. Secondly, it seems to be contrary to the town centre objective of the Neighbourhood Plan, which seeks to increase the density of residential living in the town centre.

Policy J5 – Unsustainable businesses

It is suggested that the word ‘and’ at the end of each criteria is replaced by the word ‘or’.

This response has focused on the policies within the submitted Neighbourhood Plan, rather than on the expressed community aspirations. The TDA supports many of the aspirations expressed by the community, as they provide a positive basis on which discussions about change, growth and development can take place. They also provide a value benchmark of community views against which future development proposals can be assessed.

Pat Steward

Town Centre Regeneration Programme Director

TDA