

**TORBAY COUNCIL (CROSSWAYS SHOPPING CENTRE)
COMPULSORY PURCHASE ORDER 2020**

STATEMENT OF REASONS

Section 226(1)(a) of the Town And Country Planning Act 1990

The Acquisition of Land Act 1981

Section 13 of the Local Government (Miscellaneous Provisions) Act 1976

1 INTRODUCTION

- 1.1 Torbay Council (“the Council”) resolved to make the Torbay Council (Crossways Shopping Centre) Compulsory Purchase Order 2020 (“the Order”) on 26 September 2019 under section 226(1)(a) of the Town and Country Planning Act 1990 (as amended), the Acquisition of Land Act 1981 and section 13 of the Local Government (Miscellaneous Provisions) Act 1976. The Order was made on 28 August 2020. This document is the non-statutory Statement of Reasons (“Statement”) prepared in compliance with the Department of Communities and Local Government “Guidance on Compulsory purchase process and The Crichel Down Rules” dated July 2019 (“the CPO Guidance”).
- 1.2 The Council has made the Order to compulsorily acquire land (and rights over land) for redevelopment and regeneration. The land subject to the Order is land at Crossways Shopping Centre, Paignton (“the Order Land”) as shown on the plan accompanying the Order (“the Order Map”). The Order Land is currently occupied by a 1960's shopping precinct. The precinct has had little investment over the past 10 years and the number of voids has continued to grow. The centre is now poor quality and has a negative impact on Paignton and, specifically, the Town Centre.
- 1.3 The Order Land is necessary to facilitate regeneration of the site which has not been progressed by the landowner and private sector. The proposed regeneration would be for a mixed use with retail units on the ground floors and residential uses (proposed to be extra-care accommodation) on the upper floors (“the Project”). The intended outcome of the Project is to regenerate the built environment, and rejuvenate the economic health of the area by providing high quality retail units which can attract occupiers back into the locality and improve the retail offering. The proposed extra-care accommodation on the upper floors would go towards meeting an identified need for this type of accommodation in a sustainable and accessible town centre location. The Project also aims to improve connectivity and provide a rejuvenated tourist destination with enhanced appeal for residents and visitors. The proposed illustrative masterplan notes the aspiration to develop the Order Land as an attractive retail, residential and employment space.

2 ENABLING POWERS

- 2.1 The Order allows the acquisition of property and rights over land by the Council from the owners and others with an interest in the Order Land. Confirmation will be sought from the Secretary of State who will seek representations on whether the Order should be confirmed and may hold an inquiry before making its decision. The Secretary of State's consideration will include considering whether there is a compelling case in the public interest for acquisition of the land and the new rights and that the policy and legal tests for obtaining an Order have been met.

- 2.2 The Council has compulsory purchase powers within the Town and Country Planning Act 1990 to acquire land, which it considers to be the appropriate powers in this case. Specifically, section 226(1)(a) allows the Council to acquire land for the purposes of development, re-development or improvement, so long as it thinks this will contribute to promotion or improvement of economic, social or environmental well-being of the area. It is considered that these are tests are met.
- 2.3 The CPO Guidance advises that, in utilising the section 226 powers, there should be a clear strategic framework justifying the land acquisition. In this case there is a detailed planning framework (which is dealt with in this Statement) with an up to date development plan which supports the proposed redevelopment and regeneration of Crossways. It is considered that the proposed development will contribute to the promotion and/or improvement of the economic, social and environmental wellbeing of the area and it is not considered that this can be achieved otherwise than by the use of compulsory purchase powers.
- 2.4 Under section 13 of the Local Government (Miscellaneous Provisions) Act 1976 the Council has the power to compulsorily acquire new rights over land. The rights which are sought are included in the Schedule to the Order summarised in section 4 below.

3 REASON FOR PROPOSAL

- 3.1 The Adopted Torbay Local Plan 2012-30, "A Landscape for Success" ("the Local Plan") identifies Crossways Shopping Centre as a town centre regeneration site (Area SDP2) under Policy SS4 for the economy and employment. It states that after careful assessment of spatial options for growth, the three town centres, including Paignton, are shown to be the most sustainable locations. The Order Land is shown on the Paignton town centre map of the Policies Maps of the Local Plan, with reference "PNPH11 PNPE1".
- 3.2 The Paignton Neighbourhood Plan was made in June 2019. Within that document policy PNP8 Crossways P37-38 supports development proposals in the Crossways, Hyde Road and Torquay Road area that meets three criteria, namely:-
- (a) Retain the secondary retail frontages along Hyde Road and Torquay Road;
 - (b) Enable reoccupation of the existing Crossways shopping centre for retail use, or redevelopment for retail or mixed use at ground floor level with residential accommodation above; and
 - (c) Retain a pedestrian link between Torquay Road and Hyde Road in a manner that contributes towards the improvement of the pedestrian network and green infrastructure links.

- 3.3 The majority of the area shaded pink on the Order Map is owned by Gaelic Investments who acquired the land in 2009. Although the Council has entered into negotiations with Gaelic Investments to acquire the relevant plots of the Order Land, those negotiations have not yet been successfully concluded. Powers of compulsory acquisition are needed to secure the land in the event those negotiations are not successful in order to ensure that the land can be released for regeneration.
- 3.4 Negotiations with Gaelic Investments were actively pursued up to early 2019. Due to Gaelic's indication of an intention to itself redevelop the site, those negotiations were placed on hold at that stage. Despite the period of time which has since passed, there is no indication of any redevelopment proposals being actively pursued by Gaelic Investments and the site, therefore, remains undeveloped and in need of regeneration. In particular, no application for planning permission has been made. To ensure the site is appropriately redeveloped, the Council is, therefore, now proposing to take the lead in the redevelopment of the site through its compulsory purchase powers. In parallel with this, the Council has restarted negotiations with Gaelic Investments, and others with land interests in the Order Land, with the intention of acquiring all interests by private treaty where practicable.
- 3.5 This planning application process will run in parallel to the formal CPO process. The redevelopment of the site will be carried out through the Council's Housing Company to deliver a mixed use scheme containing Extra Care Affordable housing, a small number of open market units and retail/commercial space providing an active street frontage to the development
- 3.6 The Council has considered the best way to bring the Order Land forward for regeneration and has determined that, given the history of this site and that landowner proposals for regeneration have not demonstrated any meaningful progress, authority should be sought for compulsory powers to acquire this site to facilitate regeneration. This approach aligns with the CPO Guidance as the Council has a clear idea of how it intends to use the land and has outlined how the necessary resources are likely to be available within a reasonable time-scale. The acquisition is considered to be necessary and needed in order to allow redevelopment of the Order Land to proceed. It is considered that there is a compelling case in the public interest to utilise the Council's powers of compulsory acquisition to bring forward the site's redevelopment, without which there is no certainty that the site will be regenerated.
- 3.7 Without the Order, it is unlikely that this site would be regenerated and the opportunity to provide extra-care accommodation in the town centre at this location would not be taken up. Given the difficulties in releasing the Order Land for redevelopment taking no action in respect of this land is unlikely to achieve the Council's regeneration aims. The Order is being progressed in order to avoid loss of further time.

4 LAND AND RIGHTS TO BE ACQUIRED

- 4.1 In order to deliver the Project, the Council seek to acquire existing interests, and create and acquire new rights in the Order Land.
- 4.2 The Order Map identifies the extent of the land to be compulsory acquired and where new rights are to be created and acquired. This consists of the following plots shown on the Order Map:
- (a) Plots 9, 10, 12, 13, 16 - 20 shaded pink which are to be compulsory acquired;
 - (b) Plots 1 – 8, 11, 14, 15, 21, 22 shaded blue where new rights are to be created and acquired.
- 4.3 The majority of the area shaded pink on the Order Map is within the freehold ownership of Gaelic Investments. The only part of this land which is not owned by Gaelic Investments is the part of plot 12 not consisting of the overhanging car park which is owned by Paul Douglas Wallis. There are also a number of commercial tenancies. All rights, unless acquired voluntarily, are the subject of the Order. Both control and vacant possession of these plots will be required for the Project.
- 4.4 The area shaded blue on the Order Map is required for new rights to be created to facilitate the construction of the Project. This will include the airspace rights required for crane oversailing. The Schedule to the Order refers to various landowners and tenants with an interest in these plots.
- 4.5 Utilities searches have been carried out in respect of the whole of the Order Land which have revealed the presence of various statutory undertakers' apparatus. Those include Openreach / BT, South West Water, Virgin Media, Wales and West Utilities and Western Power Distribution. The Council will be required to enter into discussions with the relevant utilities companies to ensure that appropriate protective measures and/or relocation of apparatus affected by the proposed development will be carried out. These discussions will be required whether the development is brought forward by the Order or voluntary agreement.
- 4.6 Searches of public rights of way in the vicinity of the Order Land have also been carried out. Nothing has been revealed which is anticipated will interfere with the proposed redevelopment.

5 EFFORTS TO ACQUIRE BY AGREEMENT

- 5.1 To comply with the CPO Guidance the Council will need to demonstrate that they have taken reasonable steps to acquire all of the land and rights included in the Order by agreement. The compulsory purchase of the Order Land is intended as a last resort to secure the land and rights required for the Project.

- 5.2 Though compulsory purchase is a last resort, the CPO Guidance states that it is often sensible to initiate compulsory purchase procedures alongside the negotiation process and that doing so will help to show the seriousness of the acquiring authority's intentions.
- 5.3 The Council has previously entered into negotiations with Gaelic Investments and others with an interest in the land for voluntary acquisition of relevant plots of the Order Land. Negotiations to acquire these plots have not so far been successful.
- 5.4 Negotiations with Gaelic Investments were actively pursued up to early 2019. These negotiations did not proceed smoothly as Gaelic Investments were seeking a purchase price far in excess of what the Council's advisors assessed as the market value. In early 2019 Gaelic Investments indicated its intention to redevelop the site themselves, those negotiations were placed on hold at that stage, so as to allow Gaelic Investments to bring forward their own proposals for the site. Despite the significant period of time which has since passed, there is no indication of any redevelopment proposals being actively pursued. No application for planning permission has been made. The Council considers that it is important to bring forward the site and it is therefore now proposing to take the lead in the redevelopment of the site through its compulsory purchase powers. The intention will be to acquire all interests by private treaty where practicable and compulsory powers will only be used where this is unsuccessful.
- 5.5 There are also a number of owners and occupiers around the main site of the Project where the Council will need to create and acquire rights to facilitate the construction of the Project.
- 5.6 Progressing the Order in parallel increases the likelihood of voluntary agreements being reached with some owners as they have greater incentive to engage with the Council.
- 5.7 If agreement is reached with the relevant parties to release the land for redevelopment before it is necessary to exercise the Order then the decision can be taken not to exercise it. Progression of the Order in parallel with negotiation provides the option to use powers should they be required and the Council retains the ability not to implement any part of the Order. A situation where the Order is obtained but not needed as agreement is ultimately reached is considered a positive outcome in the CPO Guidance.

6 DELIVERABILITY AND FUNDING

- 6.1 Funding for the redevelopment works has been identified to fund a total development cost of circa £22,500,000. This funding is made up from a variety of grant sources and borrowing. In addition to this the Council has committed £2,000,000 from an Adult Social Care grant, £1,750,000 from an Affordable Housing grant and an additional £100,000 towards the feasibility of the project. The Council is satisfied that sufficient resources are available.

- 6.2 In 2019, the Council carried out, with consultancy support, feasibility designs and cost appraisals to inform its decision making and also to confirm the viability of any redevelopment. These designs are in accordance with planning policy and the aspirations set out in both the Local Plan and Neighbourhood Plan.
- 6.3 It is likely that a loan for a capital purpose will be made to the Housing Company to develop the site, therefore the borrowing will ultimately be repaid from future rental income in the form of loan repayments over an appropriate asset life from the Housing Company.
- 6.4 Compensation will be payable to any landowner or rightholder whose interests are compulsorily acquired. Compensation will be assessed on the basis of the compensation code which essentially applies an open market valuation but which disregards any increase or decrease in value resulting solely from the Council's proposed scheme. The Council has previously received advice from an expert valuer on the likely value of the Order Land if acquired by compulsory purchase and will continue to do so as part of any compulsory or voluntary acquisition.
- 6.5 The compensation liabilities, including the acquisition of Gaelic Investment's interest, will be met by the Council. Funding will be made available to meet any liabilities arising immediately upon the making of the Order if a blight notice were served by any party affected by the Order. It is intended that any payments made by the Council will be recouped from monies received through the variety of grant funding in so far as possible.

7 THE PLANNING POSITION

National Policy

- 7.1 The National Planning Policy Framework (NPPF) (February 2019) provides the Government's overarching planning policy guidance. The paragraphs below are of particular relevance to the Project. Planning policies and decisions should:
- (a) support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation (paragraph 85);
 - (b) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages (paragraph 91(a)); and
 - (c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land (paragraph 118(c)).

Local Policy

- 7.2 The Neighbourhood Plan for Paignton was adopted on 19 June 2019 following the positive outcome of the Referendum held on 2 May 2019. The plan recognises that the Torquay Road area provides a thriving scene of business frontages save for Crossways shopping centre which is stated to have a high level of unoccupied space. The plan states that, ideally, the shopping centre will provide space for growth of new retail opportunities that will add vitality and attraction to the experience of tourists and residents. The plan lists the objectives for Crossways as development of a multi-use site, including residential accommodation and retail and the priority town centre location for a supermarket (should one be needed). It is also an objective to retain the primary and secondary role of Hyde Road and Torquay Road as a shopping street and to retain a pedestrian link between Torquay Road and Hyde Road in a manner that contributes towards the improvement of the pedestrian network and green infrastructure links. The Project will therefore help to deliver the aims of the Neighbourhood Plan.
- 7.3 The proposals set out in this Statement aligns with the Partnership Memorandum priorities in relation to driving a thriving economy and boosting the theme, thriving people and communities, and a climate fit for the future.
- 7.4 Reuse of previously developed land (often called brownfield land) represents a more sustainable use of resources than building on new sites. The town centre location of the Order Land is a sustainable location which locates development near existing services and infrastructure, thereby reducing the need to provide new infrastructure.
- 7.5 The Project complies with planning policy which is supportive of the Priorities Policy SDP1 which provides a broad spatial overview for development within and around Paignton. It specifically aims to facilitate delivery of a rejuvenated town centre (as well as the harbour and waterfront). Policy SDP2 (Paignton Town Centre and waterfront) identifies a regeneration focus on the economy, built and natural environments. It looks at improvement to connectivity and providing a rejuvenated tourist destination with enhanced appeal for residents and visitors. Policy TC1 (Town Centres) supports these aims.
- 7.6 Policy SS4 (the economy and employment) supports the regeneration of Torbay and improvement in its economic performance. Policy SS5 deals with employment space and recognises that, in order to meet the needs of existing, growing and new businesses, sufficient high quality space will be provided to meet existing and arising requirements of employers. The provision of new and improvement of existing employment space will be supported in areas including Town Centres. This will include space and facilities for employment uses and health, leisure, retail, tourism and education.

- 7.7 The Order Land is referred to as one of the sources of employment land as a 'Town centre regeneration site' (Area SDP2) and is noted as a mixed use scheme as part of a harbour-side, waterfront and town centre regeneration. The Paignton Town Centre Masterplan (June 2015) sets out a clear vision for Paignton Town Centre as a vibrant, clean, green, well designed, prosperous and multi-functional location. It is acknowledged that the strategy for the future of Paignton needs to focus on a number of important features including offering tourism, leisure and retail attractions that enable Paignton to compete as a 21st century resort of distinction and ensure that it is a successful economic engine for the town and wider area, is safe and welcoming to residents, visitors and people who work in Paignton, is easy to move around and understand and includes a balanced and vibrant residential community.
- 7.8 Section 06 of the Masterplan deals with Crossways and Torquay Road. The Masterplan states that it is widely accepted among the local community that the existing Crossways development detracts from the overall character of the town. Its development potential has the ability to regenerate this whole area and improve its appeal for the local business community.
- 7.9 The Order Land site is recognised as one of the town's key development opportunities. It is also acknowledged that its redevelopment will be influenced by what is happening around it, including changes to the traffic network. Any future development will need to relate to the changing environment. The Masterplan explains that the heart of the scheme is a covered arcade which forms part of a strategic cross-town heritage route. Redevelopment will need to respect this route.
- 7.10 The ground floor would be best suited to retail and other related high street uses. Upper levels of the main building could incorporate a multi-storey car park with high level residential accommodation and the feasibility drawings provided.
- 7.11 The Masterplan recognises that if landowner constraints are perceived to hinder a redevelopment opportunity and the tangible economic or community benefits which would be generated by the development, the Council will consider the use of CPO to remove such barriers and enable key delivery of sites as may be required.
- 7.12 The Masterplan does refer to proposed traffic changes in the area, in particular to Torquay Road and Hyde Road. However, such changes are not required in order to deliver the development of Crossways and are not needed in order to make the proposals viable (and therefore do not represent an impediment to delivery).
- 7.13 Policy PNP8 gives support for development proposals which, inter alia, enable reoccupation of the existing shopping centre for retail use, or redevelopment for retail or mixed use at ground floor level with residential accommodation above and retain the

pedestrian link between Torbay Road and Hyde Road in a manner which contributes towards improvement of the pedestrian network and green infrastructure links.

- 7.14 There is, therefore, a lot of policy support for the redevelopment of Crossways and a number of improvements will be secured through its regeneration. It will help drive and boost the economy and will rejuvenate the town centre. The intended aim of the proposals are to provide high quality retail units which can attract occupiers back into the locality and improve the retail offering (economic well-being). It will provide new and improved employment space to a building which currently detracts from the overall character of the town (environmental well-being). The potential to regenerate this whole area is a key consideration and a significant opportunity. It also provides an opportunity for much needed extra care accommodation for local people to be delivered in a sustainable and accessible town centre location (social well-being).
- 7.15 It is therefore considered critical to progress the redevelopment of this important site, the delivery of which will help achieve improvements to the economic, social and environmental well-being of the area.
- 7.16 The Order Land is in close proximity to a Conservation Area. This means that the height, massing and external design of new buildings have to be carefully considered in order to ensure they complement and integrate with the Conservation Area.

8 HUMAN RIGHTS

- 8.1 The Human Rights Act 1998 (“HRA 1998”) incorporated into domestic law the European Convention on Human Rights (“the Convention”). Under the HRA 1998, it is unlawful for a public body such as the Council to act in contravention of the Convention.
- 8.2 In resolving to make a compulsory acquisition of the Order Land, the Council has considered the rights of the owners of the Order Land, in particular:
- (a) Article 1 of the First Protocol, which provides that every person is entitled to peaceful enjoyment of their possessions, and that no one should be deprived of his possession except in the public interest and subject to the law; and
 - (b) Article 6 of the First Protocol which protects the right to a fair hearing by a tribunal in the determination of civil rights and obligations.
 - (c) Article 8 of the First Protocol, which provides that every person is entitled to respect for their home and family life.
 - (d) Article 14 of the First Protocol which provides for the rights in the Convention to be enjoyed without discrimination on any ground such as sex, race, colour,

language, religion political or other opinion, national or social origin, association with a national minority, property, birth or other status.

8.3 The Council is conscious of the need to strike a balance between the rights of the individual and the interests of the public.

8.4 The approach to be taken to give effect to rights under the Convention is also reflected in the CPO Guidance paragraphs 12 and 13:

“A compulsory purchase order should only be made where there is a compelling case in the public interest.

An acquiring authority should be sure that the purposes for which the compulsory purchase order is made justify interfering with the human rights of those with an interest in the land affected. Particular consideration should be given to the provisions of Article 1 of the First Protocol to the European Convention on Human Rights and, in the case of a dwelling, Article 8 of the Convention.

The minister confirming the order has to be able to take a balanced view between the intentions of the acquiring authority and the concerns of those with an interest in the land that it is proposing to acquire compulsorily and the wider public interest.”

8.5 After considering and balancing these various interests, the use of compulsory purchase powers in this case are considered justified.

8.6 The European Court of Human Rights has recognised in the context of Article 1 of the First Protocol that *“regard must be had to the fair balance that has to be struck between the competing interests of the individual and of the community as a whole”*, i.e. compulsory purchase must be proportionate. Both public and private interests are to be taken into account in the exercise of the Council’s powers and any interference with Article 8 rights must be *“necessary in a democratic society”* i.e. proportionate. In pursuing a CPO, the Council has to carefully consider the balance to be struck between individual rights and the wider public interest having regard also to the availability of compensation for compulsory purchase.

8.7 Article 8(1) provides that everyone has the right to respect for his/her property but Article 8(2) allows the State to restrict the rights to respect for the property to the extent necessary in a democratic society and for certain listed public interest purposes e.g. public safety, economic well being, protection of health and protection of the rights of others.

8.8 It is necessary for the Council to consider the possible justifications for the interference (Article 8(2)) as follows:

- Is the interference in accordance with law? There is a clear legal basis for making the Order under section 226(1)(a) of the 1990 Act.
- Does the interference pursue a legitimate aim? The Order is necessary to implement the Scheme, which seeks overall redevelopment of the site in accordance with planning policy, feasibility proposals and local consultation.
- Is the interference necessary in a democratic society? This requires a balanced judgement to be made between the public interest and the rights of individuals. The Order is considered to be both necessary and proportionate in that the land to be acquired is the minimum to achieve this Scheme's objectives.

8.9 The Council has considered the effect of the above articles of the Human Rights Act and decided that on balance it is in the interest of the community to make the Order over and above the interest of the individuals affected. Interference with Convention rights is considered by the Council to be justified for the reasons set out in this Statement of Reasons. The Council in making this order also had particular regard to the rights of the individuals to compensation.

8.10 Article 6 also requires that those whose civil rights may be affected by a decision are given a fair hearing by an independent and impartial tribunal. This is secured by means of the CPO process, including the holding of an Inquiry into any objections which may be made, and the ability to challenge any CPO confirmation decision in the High Court.

8.11 The opportunity has been given to landowners to make representations regarding the Council planning policies that underpin the Order. Objections may be made to the making of the Order. Further representations can be made in the event of any Public Local Inquiry that the Secretary of State may decide to hold in connection with the Order. Those directly affected by the Order will be entitled to compensation under the compensation legislation, equivalent to the loss that they incur as a result of the acquisition.

9 PUBLIC SECTOR EQUALITY DUTY

9.1 The CPO Guidance provides that *"all public sector acquiring authorities are bound by the Public Sector Equality Duty as set out in section 149 of the Equality Act 2010"*. The Equality Act 2010 requires the promotion of understanding of the importance of equality and diversity, and the encouragement of good practice in relation thereto. In the promotion of the redevelopment, the Council has been mindful of the need to properly discharge its obligations under the provisions of this legislation.

9.2 An assessment under the Equality Act 2010 has been carried out in connection with the Project. The assessment is attached to the Council's Committee Report dated 26

September 2019. This includes a summary of the impacts of the development on specific groups. No negative impacts were identified in the assessment.

- 9.3 The current proposal is designed to regenerate the economy, employment and connectivity. Improvement of these three areas will in turn reduce inequalities and deprivation. The Council considers that making the Order to bring forward redevelopment of the site is justified and there is no illegal discrimination.
- 9.4 The NPPF recognises the need to ensure the continued vitality of town centres, specifically that town centres are at the heart of their communities and that policies should support their viability and vitality. A range of suitable sites should be provided for a variety of uses. The importance of good design in delivering sustainable development is recognised as is the need to promote healthy communities. The NPPF notes the need to plan positively for the provision and use of shared spaces and community facilities which can enhance the sustainability of communities.
- 9.5 This requires Local Plans to plan proactively for economic growth, to provide sufficient land and support to meet existing and future needs of businesses and other employers.
- 9.6 The proposed redevelopment will provide Extra Care accommodation for local people. This accommodation will provide sustainable homes for those with care and support needs including, but not limited to, those with learning disabilities, physical disabilities, dementia and other care needs. Due to tenants being able to stay independent for longer, having their own living space and knowing that the care and support is there as and when needed this fit for purpose accommodation will have a positive impact on their health and wellbeing.

10 CONCLUSION

- 10.1 For the reasons set out in this statement, the Council considers that there is a compelling case in the public interest for making and confirming the Order.

11 LIST OF DOCUMENTS

- 11.1 In the event that it becomes necessary to hold a public Inquiry into the Order, the Council may refer to the documents listed below. The list is not exhaustive and the Council may also refer to additional documents in order to address any objections made to the Order:
- 11.2 The Order and Order Map;
- 11.3 Council report and minutes of authorising the making of the Order;
- 11.4 National Planning Policy Framework;
- 11.5 Neighbourhood Plan for Paignton
- 11.6 Paignton Town Centre Masterplan

11.7 Adopted Torbay Local Plan 2012-30, "A Landscape for Success"

11.8 Copies of the Order and Order Map can be inspected at Paignton Library Reception, Great Western Road, Paignton, Devon, TQ4 5AG and may be seen at all reasonable hours, and may also be seen at <https://www.torbay.gov.uk/public-notices>.

16 September 2020