

2nd February 2026

TH/20252



Torbay Council
Strategy and Project Delivery Team – Spatial Planning
Tor Hill House (2nd Floor)
Union Street
Torquay
TQ2 5QW

Via email: [REDACTED]

Dear Sir/Madam,

Representations on the Torbay draft new Local Plan 2025-45 Regulation 18 Consultation on behalf of Vanguard Group Developments UK1 Limited

Thank you for providing us with the opportunity to comment on Torbay Council’s draft new Local Plan 2025-45 through the current consultation. These representations are being submitted on behalf of our client, Vanguard Group Developments UK 1 Limited (the “Client”), who own 62-70 Victoria Street opposite Paignton Train Station (the “Site”).

Our Client’s Site comprises predominately vacant brownfield land, comprising a nightclub above a row of Class E retail uses and a pub at ground floor level. The nightclub is long-term vacant and the Class E uses and pub are shortly anticipated to also become vacant. The existing buildings are in poor condition and the Site requires major investment in order to be brought back into use.

As required by the National Planning Police Framework, it is our client’s aim to make the most effective use of brownfield land by developing the Site through the design-led approach to bring it back into sustainable, long-term viable use. Their team, led by Inc Architects, are in the process of exploring options and we will be contacting the Council’s planning department to arrange a pre-application meeting to discuss these proposals in due course.

It is within this context that we are making representations on the proposed new Local Plan content. These comments are limited to the key policies and issues considered pertinent to the Site and its future development and we reserve the right to make further representations on the draft Local Plan in due course if necessary.

Comments:

1. Site Specific Allocation:

- a. Our Client's Site had previously been earmarked for a Site Allocation for 10 residential units in the previous Housing Site Options consultation document from 2022. This Allocation has not been included within the new draft Local Plan.
- b. The Site is in a highly sustainable location directly opposite a train station in a town centre. It is therefore suitable for new housing alongside ground floor active town centre uses and this principle is supported by the existing and emerging planning policies for the area. A development of the Site that included housing, if delivered at the requisite quantum, would enable investment into the Site which would in turn enable it to be brought back into a sustainable, long-term viable use.
- c. On this basis we encourage the re-introduction of the proposed Site Allocation for the Site. However, to enable flexibility for the Council to apply their own policies and for a commercially realistic and viable development to come forward, if a target number of homes is to be specified it is considered the text should indicate that this is a bottom limit with the aim to maximise the number of homes subject to addressing other policy considerations. Based on our Client's initial feasibility studies, the 10 homes previously stated in the draft Site Allocation would fail to make the most effective use of brownfield land and would not achieve the design-led optimisation of the Site. We therefore welcome a further discussion with the Council's planning department on an appropriate range if this is to be included and this can be discussed further at the forthcoming pre-application meeting.

2. Policy HE2:

- a. This requires proposals involving demolition of buildings of demonstrable significance within conservation areas to show that all options for retention have been assessed. This includes showing that all possible funding sources and other feasible options that would be less harmful have been explored.
- b. Such optioneering typically has to come early in the design stage process and can have significant cost and programme implications, especially if the process is unclear and handled on an ad-hoc basis. We encourage the Council to seek to establish a clear and succinct process and to ensure it is kept proportionate and appropriate to each case under consideration.
- c. It is vital that if such a policy is included, the wording acknowledges that any options required to be assessed in detail need to be commercially realistic and financially viable.

3. Policy TC2:

- a. We note this states that a new food store (convenience retail) should be provided in Paignton Town Centre as an element of regeneration proposals. The Site would be an ideal location for a new food store and our Client is open to discussing with Officers whether this could be provided as part of their forthcoming development proposals. Further details can be discussed at the forthcoming pre-application meeting.
4. We welcome the proposed policies that identify the area around Paignton Station as potentially suitable for tall buildings and the general impetus for growth, regeneration and increased densification in town centres contained throughout the draft Plan.

We request that Torbay Council take the above into account when further developing the Local Plan. We also look forward to arranging a pre-application meeting to discuss our Client's proposals with Officers in due course.

We further request to be notified and consulted with on any proposed Site Allocation in respect of the Site. Please direct all enquires to Tom Hawkey at Urbs at the email address provided.

Yours faithfully,

Tom Hawkey
Director (Consultant)
Urbs Planning Consultancy