Strand Regeneration Project Manager
Project Management and Quantity Surveying
Torbay Council
Town Hall, Castle Circus
TORQUAY TQ1 3DR

Your Ref: Torquay Amendment Order No2 2024

09 December 2024

Dear Sir/Madam

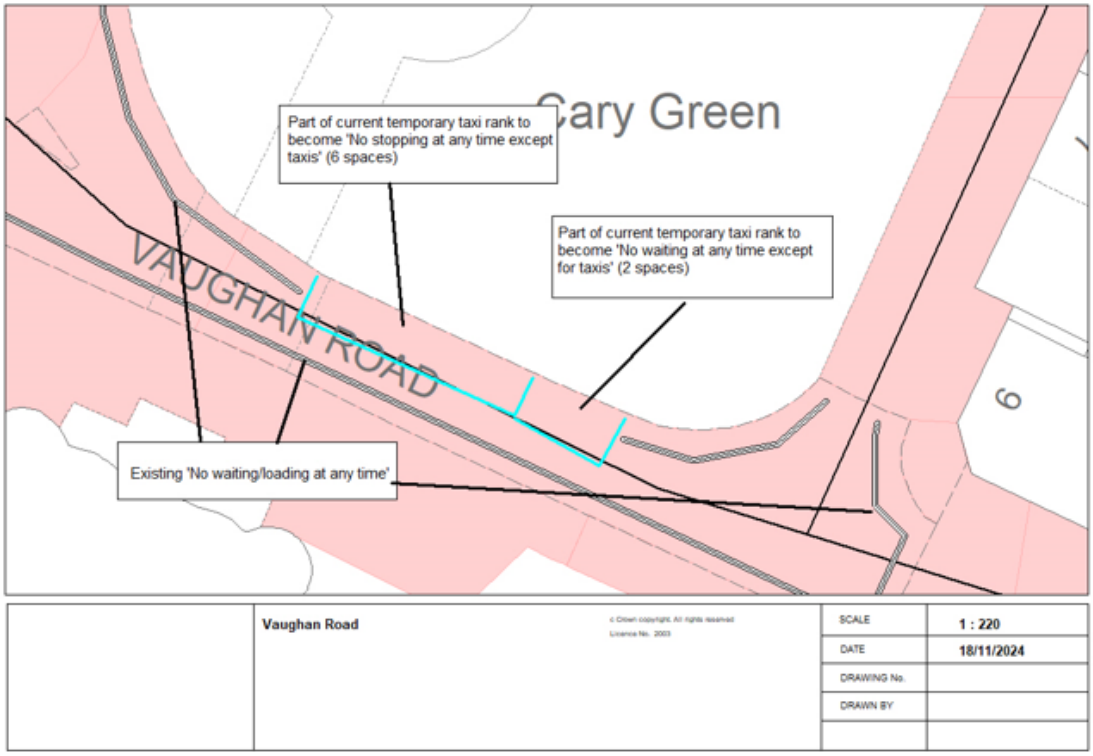
Proposed Traffic Regulation Orders (TROs): Torquay Amendment Order No2 2024

This Consultee Response has been reviewed and agreed by the Steering Group of the Torquay Neighbourhood Plan Forum.

The Forum writes to object in the strongest terms to the parts of the above TRO relating to the proposal to make the temporary taxi rank on Vaughan Road and Cary Green permanent. The grounds for objecting are as follows:

1. THE TRO IS MISLEADING AND UNTRUE

The Torbay Council website provides a link to the "Notice of Proposals" and the accompanying Schedules. The map showing the location of the permanent taxi rank is reproduced below:



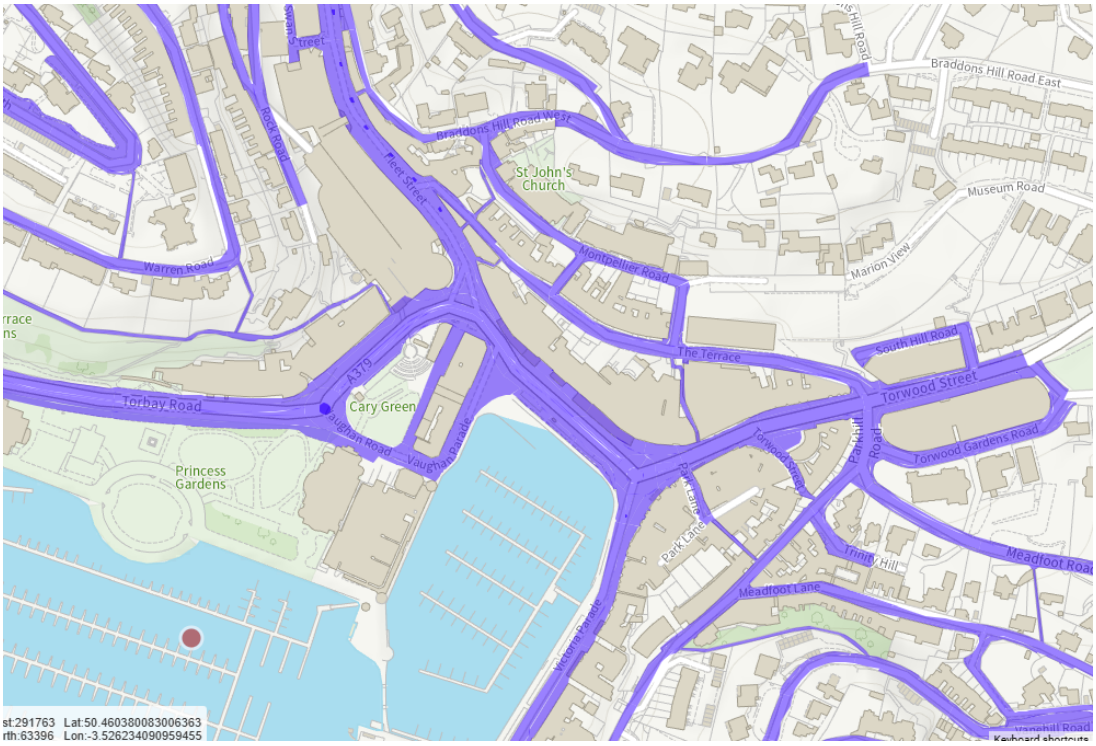
The pink coloured areas are the highway. The existing "No waiting/loading" lines on the road are shown on the map. The drawing implies that the taxi bays (outlined in blue) are **all to be on the existing highway and will not encroach onto the Green**.

The photo below shows what it is actually like on the ground:

The dotted lines in the photo are what is outlined in blue on the map. But as can be seen, the taxi bays are not on actually on the existing roadway at all, but entirely on the Green.

2. CARY GREEN IS DESIGNATED AS A LOCAL GREEN SPACE

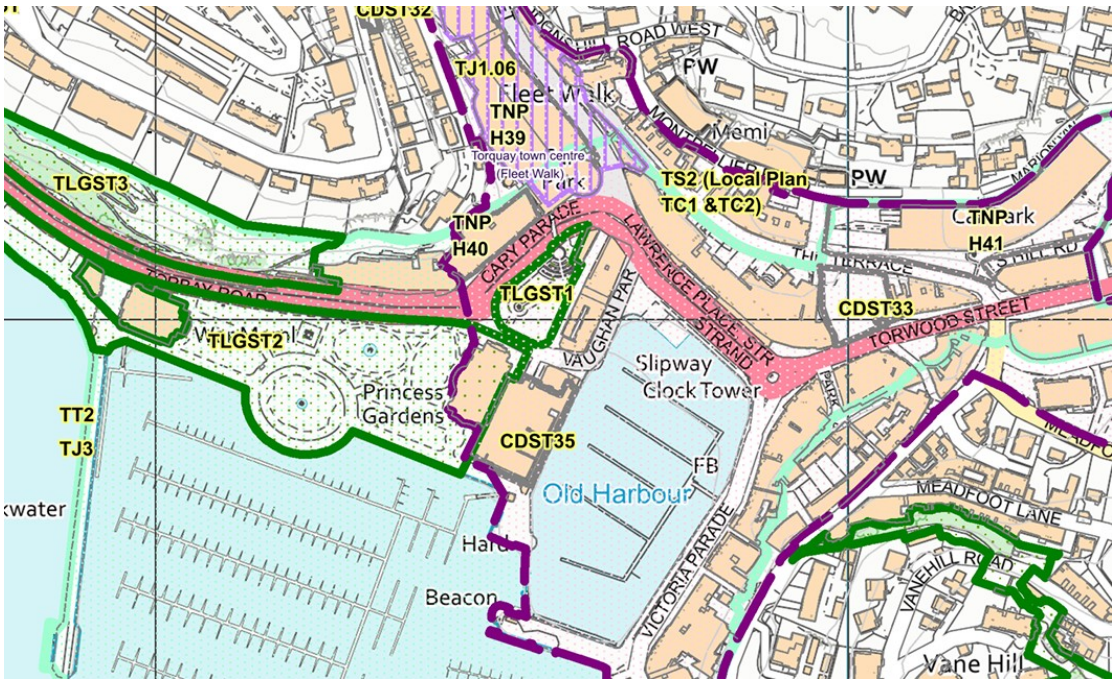
The diagram below (taken from Torbay Council's website) shows the adopted highway network in Vaughan Road and Palk Street.



Cary Green is designated as a Local Green Space reference TLGST1 in the extant Torquay Neighbourhood Plan which states:

> *"Policy TE2 - Local Green Spaces The areas listed below, indicated on the accompanying plan and shown in detail on the Neighbourhood Plan Policies Maps, are designated as areas of Local Green Space, where development is ruled out, other than in very special circumstances. Very special circumstances may include the provision of a new railway station at Edginswell, the provision of a new structure providing a café, beach facilities and toilets at Hollicombe Park. In addition, minor improvements to community access, or facilities that support their use for public recreation or amateur sports, or development allowing reasonable small extensions in a style that reflects the setting and the local area which would be consistent with the LGS designation, will be supported."*

A map showing that Cary Green is designated a Green Space may be found on here: https://www.torbay.gov.uk/media/13831/torquay-neighbourhood-plan-policy-map-sheets-11-19.pdf. The relevant part of the map is reproduced below:



It is our submission that the taxi parking that will occupy some of this local Green Space permanently does not meet the criteria of Policy TE2 in that there are no "**very special circumstances**" to justify this loss of Green Space.

When “planning” the Harbour Public Realm “improvements” the Council failed to consider where the taxi stand should be moved to after relocating the bus stops from the Strand to Cary Parade where the taxi stand had previously been situated. The temporary relocation to Vaughan Parade was never suitable and cannot be justified as a permanent site because these are not “**very special circumstances**” to allow theft of part of the green space.

3. PROXIMITY TO THE PAVILION

The Pavilion is a Grade II listed building.

To allow the taxi rank to become a permanent feature will have an adverse impact upon the setting of the Pavilion in the Conservation Area.

4. TIMESCALES

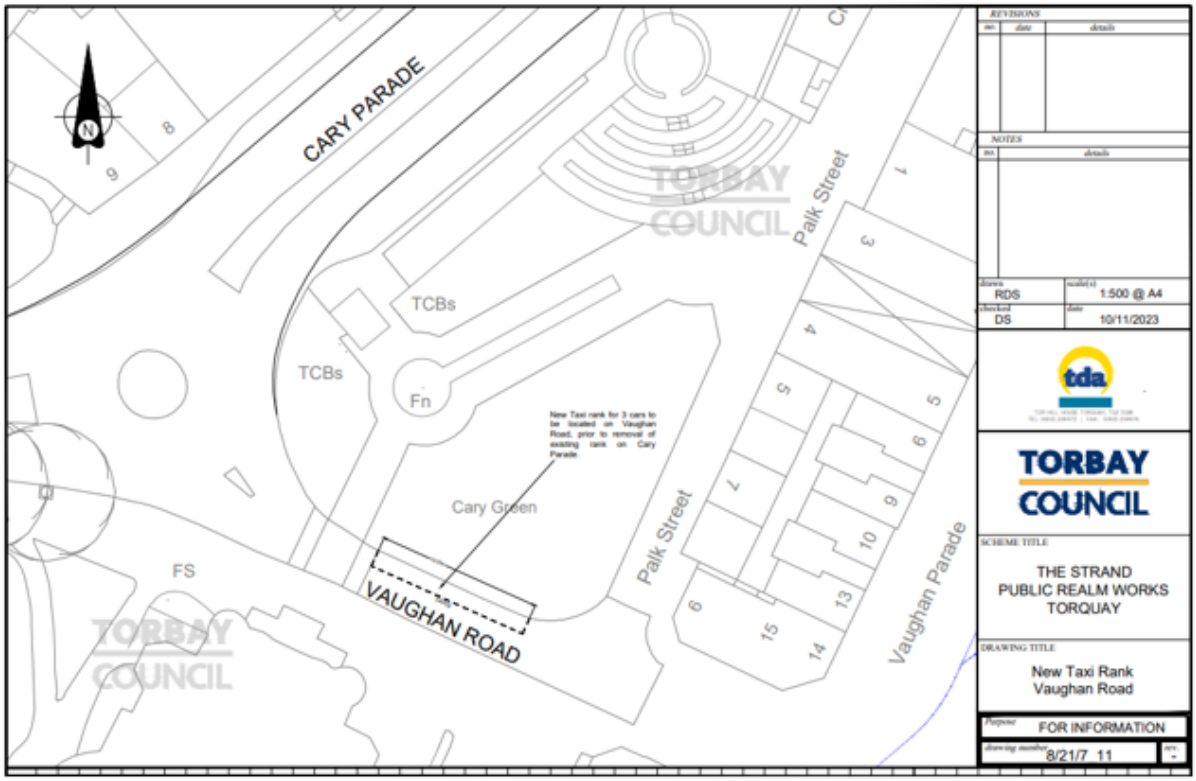
A Temporary Order was made on 20th December 2023 so that the taxis could park here temporarily whilst the Strand construction works take place. This Order has a time limit of 18 months, so presumably will expire on 20th June 2025. **However, the consultation on making this change permanent requires comments by 10th December 2024.**

Why the haste, what is the rush?

Once a part of the Green Space is lost and the setting of the Pavilion spoilt, this change will endure for a generation, or potentially forever. Please take the time available before expiry of the Temporary Order to conduct a properly managed study of the alternative options of the siting of the taxis and not rush into a hasty solution.

The Forum has engaged with Taxi Drivers and asked them to provide a list of their requirements for a taxi rank. When we have these, we propose to have a meeting with them, the Forum, and relevant Councillors and Officers to find a suitable site.

Furthermore, the diagram in the TRO for the temporary taxi rank shows that this was for three vehicles only, parallel-parked to the curb and entirely on Vaughan Road. See diagram below:



HOWEVER, what has actually been created as a temporary rank is different from this as the vehicles are parked perpendicular to Vaughan Road and entirely on Cary Green.

5. PERMISSIONS

The TRO was for three vehicles only standing parallel on Vaughan Road. What has been created is space for approximately eight vehicles reverse-parked onto Cary Green. The Forum has been searching for the Planning Application on the Torbay Council website seeking the approval for this change. We cannot find this information.

PLEASE ADVISE WHERE THE PLANNING PERMISSION WAS GRANTED FOR THE USE OF PART OF CARY GREEN FOR TAXI PARKING.

Also, we have not seen any notices posted in the vicinity advising members of the public about the proposed TRO, and that they can make comments on this to the Council. This is at variance with the process followed in other parts of the Bay where other proposed TROs have been notified and local notices have been posted inviting the public to comment.

6. ALTERNATIVE OPTIONS

The Forum notes that there are eleven taxi parking bays located at the northern end of Victoria Parade, and new bays on Torwood Street. If additional taxi parking bays are required over and above these, then in order to assist both Torbay Council and taxi drivers in finding a suitable location we offer the following options for your consideration:

Palk Street

- At the northern end close to the junction with the Strand
- This could allow taxis to exit by turning left or right
- Taxis may enter via roundabout where Vaughan Road meets Cary Parade

Eastern End of Torbay Road

- Parking bays may be located on the eastbound side of the carriageway
- This will allow taxis to either proceed straight on towards Wellswood and St Marychurch, or alternatively, if they have a passenger going in the direction towards Paignton then the vehicle simply proceeds to the Vaughan Road/Cary Parade roundabout to exit in the Paignton direction.

Fleet Street – concerns

In addition, we object to the TRO relating to the creation of a permanent taxi rank on Fleet Street. The temporary rank currently occupies the only designated loading bay at this end of Fleet Street for lorries and vans delivering to the businesses. If the loading bay becomes a permanent taxi rank, these vehicles will be forced to park on the road putting them into conflict with the buses. It will also create confusion and the illusion that private vehicles can come onto Fleet Street.

As you are aware, there are already issues with fast food delivery drivers driving up and down Fleet Street and having taxis here too we feel will simply exacerbate the issue. It also puts at threat the long-held ambition of the Forum to see a fully pedestrianised Fleet Street.

7. CONCLUSIONS

To reiterate, the Forum objects in the strongest terms to this proposed TRO.

We urge you to convene a formal "options workshop" to identify, evaluate and determine the optimum way forward to resolve this matter in the best interest of all parties including the community, and the Forum would be pleased to participate in this process.

The Forum also wishes to record its extreme disappointment in the misleading information that Torbay Council has seen fit to post on the Council website.

Yours sincerely

Rodney Horder

Chair
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