

neighbourhood plans

From: Palmer, Paul
Sent: 18 December 2017 08:39
To: neighbourhood plans
Subject: TDA Response - Neighbourhood Plans
Attachments: Brixham - Green Spaces in the Neighbourhood Plans.pdf; Paignton - Green Spaces in the Neighbourhood Plans.pdf; Torquay - Green Spaces in the Neighbourhood Plans.pdf; Torquay Neighbourhood Plan - Local Green Space Designations (TDA Comments Dec 2017).pdf; Paignton Neighbourhood Plan - TDA comments Dec 2017.pdf; Brixham Pensisula Neighbourhood Plan - TDA Amendments Dec 2017.pdf

Dear Neighbourhood Planning Team

Please find attached on behalf of Torbay Council, TDA's response to the Neighbourhood Plans Local Green Space Designations.

There are two documents for each Neighbourhood Plan a Schedule and Commentary.

Kind Regards

Paul Palmer MRICS (Registered Valuer)

Estates Manager

TDA
Tor Hill House
Union Street
Torquay
TQ2 5QW
Tel: 01803 207920
Fax: 01803 207511



This email and any attachments are intended solely for the use of the intended recipient(s) and may contain confidential information and/or may be legally privileged. If you have received this email in error, please notify the sender immediately and delete this email.

TDA is a trading name 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

Response to the designation of Green Spaces in the Neighbourhood Plans

TDA on behalf of Torbay Council (acting as a landowner) – 15th December 2017

Brixham Neighbourhood Plan

As a summary the Council, in its capacity as a landowner, issued its first representation on the Brixham Neighbourhood Plan, via the TDA, on the 9th March 2017. This was a site by site analysis. Objections were made to the green space designation where some development potential existed. But the Council did not object to designations where land had an established recreation use such as allotments / memorial gardens etc. The TDA issued a clarification statement, on behalf of the Council, on the 18th May 2017 specifically in relation to the Churston Golf Course E 4-13 and the site of club house and 1st & 18th Holes. This statement reiterated the Council's objection to the Green Space Designation for this site. Since this time the Council, through the TDA, has issued subsequent representation on both the Paignton and Torquay Neighbourhood Plans. These subsequent representations have been in the form of an overarching principle. As a consequence the Brixham Neighbourhood Plan Local Green Space Designation has been revisited. Therefore, the TDA's view on behalf of Torbay Council is as follows;

To create a more uniformed position across each Neighbourhood Plan, Torbay Council, through its agent, the TDA, recognises that the National Planning Policy Framework does set out the opportunity for Neighbourhood Plans to identify Local Green Spaces. TDA agrees that local communities through local and neighbourhood plans should be able to identify for consideration green areas of particular importance to them for protection. However, it is not always appropriate to simply identify land as Local Green Space. The designation should only be used if, for example, the land in question is demonstrably special and has local significance. When identifying land as Local Green Space it is important to be consistent with the local planning aims of sustainable development and should complement investment in sufficient homes, jobs and other essential services.

It is reasonable for the TDA, on behalf of Torbay Council, to continue to object to any designation where it is believed that any of the criteria that should be applied when identifying Local Green Spaces has not been met. This should include the need to complement the need for investment in homes, jobs and services and that its designation must be capable of continuing beyond the plan period (2030), i.e. that the criteria will continue to be relevant. Many of the identified sites have the benefit of significant Local Plan protective designations either wholly or in part, for example Berry Head Special Area of Conservation (SAC). This therefore already offers a significant degree of protection. Furthermore, Central Government through its One Public Estate programme continues to direct local authorities to generate efficiencies, through capital receipts and reduced running costs from land holdings. In addition, the Local Government Association has specifically identified the use and income from Council assets to support core services. For this reason and also taking into account the Council's Corporate Asset Management Plan, a key policy framework document which states the Council should not restrict or reduce the current or future value of its assets through the use of covenants and other restrictions, the Council now strongly objects to all proposed Local Green Space designations as set out in the Brixham Neighbourhood Plan in the attached schedule. There are a number of specific proposals for a number of the sites identified and any such designation would prevent the Council in bringing forward these proposals.

Brixham Peninsula Neighbourhood Plan - Consultation

| Policy Reference | Plan Reference | TOAD Reference | Property | Comments |
|---|----------------|----------------|---------------------------------------|--|
| Policy E4 - Local Green Spaces | | | | |
| E4 - 2 | E4 - 2 | B0198 | Astley Park | Object to LGS designation possible future development of all or part |
| E4 - 3 | E4 - 3 | B0086 | Battery Gardens | Object to LGS designation possible future development of all or part |
| E4 - 4 | E4 - 4 | B0001 | Berry Head County Park | Object to LGS designation possible future development of all or part |
| E4 - 5 | E4 - 5 | B0089 | Bonsey Garden & Land | Object to LGS designation possible future development of all or part |
| E4 - 9 | E4 - 7 | B0083/85/87 | Furzeman Greens | Object to LGS designation possible future development of all or part |
| E4 - 10 | E4 - 8 | B0061 | Jubilee Grds, Berry Head Road | Object to LGS designation possible future development of all or part |
| E4 - 12 | E4 - 9 | B0063 | Shoalstone Beach | Object to LGS designation possible future development of all or part |
| E4 - 15 | E4 - 12 | B0084 | Stoney Park Allotments | Object to LGS designation possible future development of all or part |
| E4 - 14 | E4 - 11 | B0006 | St Marys Park | Object to LGS designation possible future development of all or part |
| E4 - 7 | E4 - 13 | B0326 | Churston Golf Course | Object to LGS designation possible future development of all or part |
| E4 - 8 | E4 - 14 | B0333 | Elberry Headland | Object to LGS designation possible future development of all or part |
| E4 - 17 | E4 - 15 | B0340 | Warborough Common (Windy Corner) | Object to LGS designation possible future development of all or part |
| E4 - 16 | E4 - 16 | P3036 / P0057 | Sugar Loaf Hill | Object to LGS designation possible future development of all or part |
| Policy E5 - Open Spaces of Public Value | | | | |
| E5 - 2 | E5 - 1 | B0017 | Wall Park | Object to LGS designation possible future development of all or part |
| E5 - 4 | E5 - 3 | B3007 | Chestnut Primary School Playing Field | Object to LGS designation possible future development of all or part |
| E5 - 5 | E5 - 4 | B0056 | Churchill Memorial Gardens | Object to LGS designation possible future development of all or part |
| E5 - 12 | E5 - 12 | B0329 | Land at Sommercourt Way | Object to LGS designation possible future development of all or part |
| E5 - 14 | E5 - 8 | B3021 | Garlic Rea Open Area | Object to LGS designation possible future development of all or part |
| E5 - 16 | E5 - 9 | B3007 | Woodland adj to Chestnut School | Object to LGS designation possible future development of all or part |
| E5 - 17 | E5 - 10 | B3013 | Monksbridge Skate Park | Object to LGS designation possible future development of all or part |
| E5 - 8 | E5 - 11 | B0215 | Mount Pleasant Quarry Site | Object to LGS designation possible future development of all or part |
| E5 - 18 | E5 - 12 | B0327 | North Boundary Playground | Object to LGS designation possible future development of all or part |
| E5 - 19 | E5 - 13 | B0279 | Parkham Field | Object to LGS designation possible future development of all or part |
| E5 - 21 | E5 - 15 | n/a | Penn Meadows Verges | Object to LGS designation possible future development of all or part |
| E5 - 22 | E5 - 16 | B0279 | Rowan Way Playground | Object to LGS designation possible future development of all or part |
| E5 - 24 | E5 - 18 | B3019 | Sharkham Village Playground | Object to LGS designation possible future development of all or part |
| | E5 - 19 | B0386 | Maritime Steps North View Road | Object to LGS designation possible future development of all or part |
| E5 - 25 | E5 - 21 | B0402 | Washbourne Close | Object to LGS designation possible future development of all or part |
| E5 - 11 | E5 - 24 | B0401 | Ferrers Green Land | Object to LGS designation possible future development of all or part |
| | E5 - 25 | P004 | Land at Blue Water Drive | Object to LGS designation possible future development of all or part |
| E5 - 13 | E5 - 26 | B0354 | Galmpton Memorial Playing Field | Object to LGS designation possible future development of all or part |