

Application Number

P/2016/1266

Site Address

Half Moon Inn
188 Torquay Road
Paignton
TQ3 2AL

Case Officer

Carly Perkins

Ward

Roundham With Hyde

Description

Demolition of the existing public house and the erection of three residential apartment buildings to provide 30 residential units with associated parking and landscaping (revised plans received 1 June 2017)

Executive Summary

The application site is approximately 0.26ha in size and is located to the south east of Torquay Road which is part of the Torbay Major Road Network. The site is occupied by a vacant two storey public house and associated car park to the rear. The public house hasn't been in use since May 2015, but the use of the car park has been continued informally by nearby businesses and visitors to the area since the use ceased. Vehicular access to the application site is from Torquay Road. To the north east of the site is Preston District Centre and to the north-west is the historic park and garden of Oldway Mansion which sits beyond apartment blocks on Torquay Road. To the south west of the site is Torbay School and a row of terrace houses, to the south east is a vacant area of open space and to the north east are apartment blocks served off Brookfield Close. A multi-use games area (MUGA) has been granted planning permission to the rear of the site in associated with Torbay School.

The site is located within Flood Zone 1, Critical Drainage Area. To the north east of the site adjacent to the site access, are two trees subject of a Tree Preservation Order. Within the site there are a number of unprotected trees.

The proposal is for the demolition of the public house and the erection of 30 residential apartments within three separate two/three storey buildings. Of the 30 residential apartments, 24 are two bedroom apartments and 6 are one bedroom apartments. Access to the site utilises the existing access from Torquay Road, and 30 parking spaces are proposed to serve the development. Of the 30 parking spaces, 4 are designed for use by disabled persons and 4 are served by electrical charging points. Cycle and bin storage is provided within the site. A traffic island is proposed on Torquay Road.

The materials for the residential apartment blocks are largely red brick and white render. The roof material is noted as grey tiles. The tree report submitted in

support of the application states that the proposals will result in the loss of 25 of unprotected trees. Off-site trees along the north eastern boundary of the site are to be retained. Additional trees are proposed as part of an on-site landscaping scheme.

No affordable housing provision is provided within the proposal. A viability assessment carried out on behalf of the applicant has been submitted with the application.

Whilst the principle of the loss of the public house and redevelopment for residential purposes is considered acceptable, a lack of information to demonstrate that the development would be well designed and would create a good quality environment for people to live in and concerns regarding the overdevelopment of the site, lack of affordable housing and loss of employment contributions has led to a recommendation of refusal.

The proposals are not considered to accord with the provisions of the Torbay Local Plan 2012-2030. The proposals are considered contrary to Policies H1, H2, SS5, SS11, DE1, DE2, DE3, TA2, TA3, C4, ER1, ER2 and appendix F of the Torbay Local Plan 2012-2030 for the following reasons:

- 1) The proposal would constitute an overdevelopment of the site and fail to deliver a high quality design or good standard of amenity for future occupants as a result of poor quality landscaping, poor design and layout of buildings, poor parking arrangements and lack of visitor parking provision
- 2) Insufficient information in relation to trees and the impact on neighbouring TPOs, without which it cannot be demonstrated that the development would not result in the loss of landscape features.
- 3) A lack of detailed drainage design which makes it unclear whether the proposed development or the surrounding area could be kept safe from the effects of surface water.
- 4) The impact on on-street parking and the insufficient visibility at the access without a loss of on-street parking
- 5) Impact of proposed traffic island on free flow of traffic and on-street parking provision
- 6) The scheme fails to mitigate the loss of employment, in the absence of secured contributions or an independent viability assessment to justify a lower level of contributions, the proposal is contrary to Policy SS5 of Torbay Local Plan 2012-2030,
- 7) The proposal fails to make appropriate provision for affordable housing and in the absence of an independent viability assessment to justify a lower level of affordable housing provision the proposal is contrary to Policy H2 of the Torbay Local Plan 2012-2030.

Recommendation

Refusal for the seven reasons identified above.

Reason for Referral to Development Management Committee

The application is a major application and is therefore required by the constitution to be determined by DM committee.

Statutory Determination Period

13 weeks, an extension of time has been agreed with the applicant to the 18th August 2017.

Site Details

The application site is approximately 0.26ha in size and is located to the south east of Torquay Road which is part of the Torbay Major Road Network. The site is occupied by a vacant two storey public house and associated car park to the rear. The public house hasn't been in use since May 2015, but the use of the car park has been continued informally by nearby businesses and visitors to the area since the use ceased. Vehicular access to the application site is from Torquay Road. To the north east of the site is Preston District Centre and to the north west is the historic park and garden of Oldway Mansion which sits beyond apartment blocks on Torquay Road. To the south west of the site is Torbay School and a row of terrace houses, to the south east is a vacant area of open space and to the north east are apartment blocks served off Brookfield Close. A multi-use games area (MUGA) is proposed to the rear of the site in associated with Torbay School.

The site is located within Flood Zone 1, Critical Drainage Area. To the north east of the site adjacent to the site access, are two trees subject of a Tree Preservation Order. With the site are a number of unprotected trees.

Detailed Proposals

The proposal is for the demolition of the public house and the erection of 30 residential apartments within three separate predominantly three storey buildings. Of the 30 residential apartments, 24 are two bedroom apartments and 6 are one bedroom apartments. Access to the site utilises the existing access from Torquay Road, and 30 parking spaces are proposed to serve the development. Of the 30 parking spaces, 4 are designed for use by disabled persons and 4 are served by electrical charging points. Cycle and bin storage is provided within the site. A traffic island is proposed to Torquay Road.

The materials for the residential apartment blocks are largely red brick and white render. The roof material is noted as grey tiles. The tree report submitted in support of the application states that the proposals will result in the loss of 25 of unprotected trees. Off-site trees along the north eastern boundary of the site are to be retained. Additional trees are proposed as part on an on-site landscaping scheme.

No affordable housing provision is provided within the proposal. A viability assessment has been submitted with the application.

Summary Of Consultation Responses

Senior Strategy and Project Officer: [Comments on Original Scheme] The site is situated on a Strategic Route (A3022) with multiple junctions in a congested area. The LHA would recommend a revision in the proposed access point to Brookfield Close. As a minimum, improved visibility splays, clarity relating to delivery and waste collection vehicles and provision of suitably numbered, spaced and located visitor/disabled and electrical charging point parking spaces should be provided. The development currently proposed does not provide a safe and suitable access and is not in accordance with Policies TA2 and TA3 of the Local Plan; there is an objection to the proposal. The LHA recommends the applicants investigate the provision of an access from Brookfield Close and other matters set out in more detail below.

[Comments on Revised Scheme] Torbay Council's Local Plan (2012-2030) Policies focus on the importance of accessibility Policy TA1 and TA2 and development access, and sustainable transport measures Policy TA3 sets out parking requirement guidelines.

The access currently shown doesn't provide sufficient visibility splay due to on street parking. A Road Traffic Order to remove on-street parking ('no waiting') would need to be introduced on the A3022 frontage. However a better arrangement might be achieved if Brookfield Close formed the main access point. The proposed traffic island should be removed from the scheme.

In order to satisfy Policy TA3, the applicant needs to demonstrate that there is adequate parking including visitor parking within the curtilage of the sites. Policy TA3, Appendix F requires 1 space per flat, secured covered cycle storage (1 per flat) and parking for visitors. I note 10% of the spaces should provide for people with disabilities, 20% of the spaces with electrical charging points. Note that specifications for parking spaces are included in LP Appendix F page 297 and in the Torbay Highway Design Guide. The revised application does not include sufficient visitor parking.

Accommodation for visitors should therefore be made. The old Local Plan indicated provision for visitors in flats could be provided at a ratio of 0.5 per flat. It might be appropriate to reduce this in consideration of the adjacent District Centre and bus services if the applicants can demonstrate car parking would not impact upon the wider highway network. However, this would need to be weighed against the street parking that needs to be removed (approx. 9-10 spaces) to provide the access visibility splays needed and reduce congestion on Torquay Road.

Policy TA2 also seeks provision of a proportionate Travel Plan setting out a 30% modal shift can be achieved. The proportionate TP should include SMART targets and an annual review. The Travel Plan shall be continually monitored by a Travel Plan Coordinator (TPC) appointed to ensure that it meets its objectives and

targets. In the event that the objectives and targets of the Travel Plan are not met, the Travel Plan shall be updated by the TPC setting out further measures in order to rectify this. A copy of the Travel Plan or updated Travel Plan, as the case may be, shall be made available to the Local Planning Authority upon request during normal business hours and the contact details of the TPC shall be provided in all iterations of the Travel Plan

A revised scheme that provides appropriate highway works and sufficient parking for occupants may be deliverable on this site, however, the Highway Authority is likely to object to the current proposal unless the necessary highway, parking and sustainable transport measures can be designed into the scheme and secured by condition or s106/s278.

Senior Historic Environment Officer: There is a case for the retention of the legible form of the pub. The significant elements of the existing building are clearly defined within the submitted AC Archaeology's assessment. It is a good frontage, both in scale and harmony with the adjacent terrace. The boundary wall of the former mid-Victorian Brookfield House is also a significant part of the site. Agreement is found with the comments by the Urban Design Consultant.

Urban Design Consultant: The response concluded that the various deficiencies in the design that have been identified are nearly all the symptoms of an attempt to overdevelop the site and lead to a poor residential environment for future occupants. The desire to include this quantum of units has forced a layout which is not ideally suited to the site and its setting. The project in the form is not supported and it is recommended that the basic propositions/appraisals underpinning the development are re-examined.

Following the submission of a revised scheme: The fundamental development strategy has not changed, some of the most pressing failings have been mitigated, but the overall quality does not meet that required and expected by local plan design policies.

Senior Environmental Health Officer: No objection to the construction of the proposed development, however the predicated traffic noise is quite high. Data indicates that the road traffic noise at the façade of the current building is between 70-74dB Lden. This level of noise is significant and as such the proposed residential accommodation will require protection from traffic noise to preserve residential amenity. A condition is recommended with regard to sound insulation and noise reduction for buildings.

Waste Client Manager: [Comments on Original Scheme] Only one bin store is provided which is inadequate, space for 10 x 1100L bins must be provided as a minimum. The bin store is further away from block A making it more difficult for residents to recycle. A second bin store should be provided ensuring a higher rate of recycling. Waste collection vehicles will not be able to enter the development

and it will be the responsibility of the residents/management company to ensure that all waste is brought to a collection area by 6am on the day of collection.

[Comments on Revised Scheme] Satisfied that there is adequate space for bins/containers that will be required for recycling, food waste and residual waste generated by the number of properties at the development. The locations of the bin stores are considered acceptable in relation to the apartments.

Refuse and recycling collection vehicles will not be expected to come on to the site to collect from the bin stores. Instead bins will be taken to a collection point, less than 20m from the entrance to the development by a private management company. For this reason the swept path analysis has been completed with a 4.6 tonne van rather than a refuse collection vehicle. For this reason, waste and recycling vehicles will not be able to enter the development to collect waste and it will be the responsibility of the residents/management company to ensure that all waste and recycling is brought to the collection area, by 6am on collection day.

South West Water: No development shall be permitted within three metres of the sewer and ground cover should not be substantially altered. If development encroaches on the 3m easement, the sewer will need to be diverted at the expense of the applicant.

SWW is able to provide clean potable water services from the existing public water main for the proposal.

The applicant must demonstrate how the proposal will have separate foul and surface water drainage systems and not be detrimental to existing infrastructure, the public and the environment. The applicant should demonstrate that its proposed surface water run-off will discharge as high up the hierarchy of drainage options as is reasonably practicable.

Wales and West Utilities: Wales and West Utilities have pipes in the area and their apparatus may be affected and at risk during construction works.

Arboricultural Officer: The scheme is unsuitable for approval on arboricultural merit in relation to insufficient room for sustainable mitigating planting, lack of understanding of the impact upon neighbouring trees and absence of tree data to allow assessment of layout against tree constraints.

Drainage Engineer: Detailed drainage design is required prior to determination. Further comments awaited.

Environment Agency: The Environment Agency's Standing Advice and Lead Local Flood Authority should be consulted.

Natural England: No comments, the proposal is unlikely to affect and statutorily

protected sites or landscapes. Natural England have not assessed the application for its effects on protected species and have referred the Council to their Standing Advice. The proposed development is in an area which would benefit from enhanced green infrastructure provision. Reference is made to SSSI Impact Risk Zones.

Police Designing Out Crime Officer: [Comments on Original Scheme] It is considered that the design and layout in general provides a safe, secure and neighbourly environment where unauthorised or unwanted trespassers will be noticed. When considering parking provision, 1 space per dwelling is a concern where dwellings are largely two bed.

[Comments on Revised Scheme] When considering vehicle access, movement and parking, care must be taken to ensure the space is adequate and appropriately designed to avoid damage and inconsiderate and obstructive parking. If the parking space is awkward or access is limited, residents are likely to park badly or elsewhere, which will lead to concerns over adding parking pressure and movement to the local highway.

The close proximity of vehicles to the main pedestrian entrances to the blocks may prove problematic in terms of conflict and/or damage to vehicles from deliveries, ball games or passing bikes, prams etc.

Care should be taken with regard to undercroft parking as these can create problems by attracting the antisocial to gather or provide cover for antisocial activity thus introducing the potential for an increase in the fear of crime. The recessed areas that the undercroft parking will create must be well overlooked by active rooms from the opposing block and the space is provided lighting to an appropriate level to assist residents during the dark hours. Undercroft parking can also attract leaves.

Affordable Housing Delivery Officer: In advance of any assessment of viability as per Torbay Council's affordable housing policy, housing services would expect to see 20% affordable housing to be provided on a scheme of this size which should be proportionate to the mix of the development as a whole. On a scheme of 30 units, 6 affordable units should be provided. Until financial justification can be determined, the scheme would not be supported.

Paignton Neighbourhood Forum: The Neighbourhood Plan seeks to make more of the tourism offer in Paignton, retain local identity and ensure a balanced and sustainable development. The scale of development conflicts within these objectives. The proposal is considered to be an unjustified departure from several Local Plan Policies. A more realistic solution would be a conversion of the main building with redeveloped extensions that provide approximately 10 residential units with all existing landscape features retained.

Summary Of Representations

8 representations have been received [4 objections, 4 neutral]

Issues raised:

- o Impact on parking provision as a result of the loss of parking provision currently available within the application site
- o Impact on parking provision as a result of 1:1 parking provision
- o Impact on the flow of traffic as a result of the proposed island
- o Too many units for the size of the site
- o Impact on privacy
- o Impact on traffic congestion on Torquay Road
- o Impact on air quality
- o Queries regarding parking provision during construction
- o Need for traffic calming and resident only parking on Brookfield Close
- o Impact on stability of neighbouring property as a result of demolition of the public house
- o Need for Party Wall Act
- o Impact on safeguarding of students at Torbay School as a result of proximity of development and open space areas with adjacent School
- o Impact on amenity by reason of loss of light and overshadowing
- o Loss of privacy for school as a result of crown reduction of trees
- o Loss of amenity during demolition and redevelopment by reason of safety, noise and dust levels.

Relevant Planning History

P/2006/1789 Conservatory REFUSED 14.12.2006

P/2006/0304 Installation of window in rear elevation APPROVED 04.04.2006

P/1989/1029 Extension to form functions suite APPROVED 08.01.1990

P/1987/1942 Extension to provide raised seating area for 58 people APPROVED 15.01.1988

Key Issues/Material Considerations

The key issues to consider are the principle of the proposed development, affordable housing, the impact on the character and appearance of the area, the impact on neighbouring residential amenity, the quality of the residential environment for future occupiers, trees and landscaping, biodiversity and drainage.

Principle of the Proposed Development:

Policy SS12 of the Torbay Local Plan states that housing provision will focus upon a sustainable pattern of distribution throughout the Bay with an emphasis upon the regeneration of brownfield sites and town centre sites, and development of urban sites. Similarly Policy H1 states that proposals for new homes within Strategic Delivery Areas and elsewhere within the built-up area will be supported subject to

consistency with other policies in the plan. One of the specific criteria of this policy notes the objective to maximise the re-use of urban brownfield land and promote urban regeneration, whilst creating prosperous and liveable urban areas. Policy SDP1 states that Paignton will provide around 4,290 new homes over the plan period.

The application site is a brownfield site and is within the urban area of Paignton such that the principle of residential development in this location is supported by policy SS12, H1 and SDP1 of the Torbay Local Plan 2012-2030.

The proposed development would result in the loss of a public house (use class A4). Paragraph 70 of the National Planning Policy Framework states that planning decisions should 'guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the communities ability to meet its day to day needs' in order to deliver social, recreational and cultural facilities and services that the community needs.

In this instance the site is located in an established residential area that would not be considered to be isolated from community facilities. The submitted design and access statement indicates that there are three other public houses within 200-400m of the site such that the loss of this currently vacant building is not considered to result in significant detriment to the community in terms of the availability of easily accessible social and recreational community facilities. In addition to this, the submitted design and access statement also details the efforts to market the building for continued use as a public house without success. During the 12 months prior to the closure of the public house, only a single declaration of interest was received but this was on the basis of a significant amount of refurbishment being carried out. The applicant has indicated that the necessary level of investment required to refurbish the building cannot be justified and therefore the potential redevelopment of the site has been pursued. Therefore, in line with the above, the principle of redevelopment of this site is considered acceptable.

Affordable Housing:

Policy SS12 states that provision will be made for affordable housing within proposed developments and following on from this Policy H2 states that for proposals of 20 or more dwellings on brownfield sites, 20% of dwellings on site will be affordable housing. The information submitted with the application suggests that the development will not be providing affordable housing due to issues around viability. In line with policy H2 of the Torbay Local Plan, where developers wish to reduce significantly the level of affordable housing provision, an independent assessment of viability will be required, with the developer underwriting the cost of the viability assessment. In this instance whilst the applicants have submitted a viability assessment, the applicant has not agreed to underwrite the cost of the independent assessment of this information. In light of this, a lower than policy complaint level of affordable housing provision is not justified and this would represent a reason to refuse the application.

Character and Appearance of the Proposed Development:

Paragraph 17 of the National Planning Policy Framework states that one of the core land-use planning principles that should underpin decision taking is to always seek to secure high quality design. In addition paragraph 64 states that 'permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions'. Consistent with these paragraphs, Policy SS11 of the Torbay Local Plan states that development must help to create cohesive communities within a high quality built and natural environment where people want to live and work and that development proposals will be assessed according to whether they achieve certain criteria as far as they are relevant and proportionate to the development. Criteria 1 refers to development that meets the needs of residents and enhances their quality of life and criteria 3 refers to development helping to develop a sense of place and local identity and criteria 10 refers to delivering development of an appropriate type, scale, quality, mix and density in relation to its location. Explanatory paragraph 4.5.27 states that sustainable communities are places where people want to live, work and relax. It continues by stating that sustainable communities are those that meet the diverse needs of existing and future residents, are sensitive to their environment and contribute to a high quality of life, they are safe and well planned, built and run. Following on from this, Policy DE1 states that proposals will be assessed against their ability to meet design considerations such as whether they adopt high quality architectural detail with a distinctive and sensitive palette of materials and whether they positively enhance the built environment. During the course of the application the proposed scheme has been revised in an attempt to overcome concerns relating to design, layout, amenity, highway safety and parking provision.

Comments from both the Council's Senior Historic Environment Officer and Urban Design Consultant indicate that it would be preferable to retain the existing building on site with some form of commercial or community use at ground floor. In itself this would not necessarily represent a reason to refuse the application. The existing building, whilst of architectural merit (with the exception of some poor quality extensions and modifications), is not listed nor within a designated conservation area and therefore the Council has limited control over its retention. An architectural assessment has been submitted in support of the application and this supports the proposed demolition concluding that the building holds little architectural or historical value.

In relation to the form of the proposed development, three two-three storey blocks of residential apartments are proposed. Within the immediate vicinity of the site there are examples of other large scale apartment buildings however these are largely located to the north western side of Torquay Road with the south eastern side largely occupied by two storey buildings. Whilst Brookfield Road, represents a similar scale of development to that proposed, this would not be considered a successful development. Nevertheless it is sited at a lower level than the street

lessening the bulk and scale of the development within views from Torquay Road.

The consultation response from the Council's Urban Design Consultant indicates a number of failings which result in a poor design and character overall. The proposed design is considered to lack elegance and articulation and would not represent good quality development as is expected by both Local and National Policies. It is considered that the various deficiencies in the design, are signs that the proposal represents an overdevelopment of the site which will lead to a poor residential development for future occupants. This is particularly demonstrated by the lack of visitor parking provision, car dominated layout, poor design detailing and poor layout of spaces. Whilst the principle of three storey development in this location is not unacceptable, the massing and the layout of the buildings and spaces are a key consideration. The proposals do not appear to have been designed to respond to, nor have they been influenced by the orientation or existing features of the site. The current proposals do not demonstrate a successful scheme and is considered to represent an overdevelopment of the site which does not relate well to its surrounding both in form or design. The proposals are considered to represent poor design contrary to paragraphs 17 and 64 of the National Planning Policy Framework and Policy DE1 of the Torbay Local Plan 2012.

The Building for Life standard has been used to assess the design quality of the development proposal. Policy DE2 of the Torbay Local Plan states that major development proposals with a residential component will be assessed against 'Building for Life' criteria. This policy states that development proposals will be supported by the Council when it secures as many 'green lights' as possible. When a development proposal does not reduce the number of 'amber' and 'red lights' scored in the assessment, where a reduction is considered possible and such reduction would improve the quality of the development, the Council will not grant planning permission.

The assessment concluded that the development achieves only 2 green scores against 5 amber and 5 red scores. It is considered that the number of red and amber scores can be reduced and that this reduction would improve the quality of the development in terms of residential and local amenity enjoyed by occupiers of and visitors to the site.

The site is located within 65m Oldway Mansion and the historic park and gardens. The application site is not overtly visible from the gardens due to the landscaping within the Oldway Mansion site and the Pegasus Court development. The proposal is considered to have a neutral impact on the historic park and garden and be in compliance with Policy SS10 of the Torbay Local Plan.

Quality of the Residential Environment for Future Occupants:

There are 30 new residential units being provided as part of the proposed scheme, these comprise of 24 two bedroom apartments and 6 one bedroom apartments.

Policy SS11 of the Torbay Local Plan states that development must help to create cohesive communities within a high quality built and natural environment where people want to live and work and that development proposals will be assessed according to whether they achieve certain criteria as far as they are relevant and proportionate to the development. Criteria 1 refers to development that meets the needs of residents and enhances their quality of life. Explanatory paragraph 4.5.27 states that sustainable communities are places where people want to live, work and relax. It continues by stating that sustainable communities are those that meet the diverse needs of existing and future residents, are sensitive to their environment and contribute to a high quality of life, they are safe and well planned, built and run. Policy DE3 states that all development should be designed to provide a good level of amenity for future residents and will be assessed in terms of the impact of noise, nuisance, visual intrusion, overlooking and privacy, light and air pollution, provision of useable amenity space and an adequate level of floorspace to achieve a pleasant and healthy living environment along with other criteria. Within table 23 of the Local Plan dwelling space standards are set out, which are the same as set out within the government document Technical Housing Standards- National Described Space Standard as published in March 2015. These standards do not provide absolute requirements but they should be considered in assessing whether a good standard of accommodation is being proposed. The supporting paragraph to policy DE3 states that all new homes should provide a good standard of accommodation having regard to safety, space, amenity, parking and design.

Each of the two bedroom dwellings appear to show two double bedrooms suggesting that they are to accommodate 4 people (based on the floor area of the bedrooms being above 11.5sqm), similarly each of the one bedroom dwellings appear to show double bedrooms suggesting that they are to accommodate two people. The minimum size of a two bedroom flat is 70sqm where they are to accommodate 4. Single bedroom dwellings for two people are to meet a minimum standard of 50sqm. The majority of the units fall slightly below the size standards, falling short of the standards by 0.1-7.3sqm. It is noted that such standards will be applied flexibly to developments with regard to viability and other considerations and therefore given the limited shortfall on balance the size of proposed units is considered acceptable.

In terms of outdoor amenity space, each of the proposed apartments benefits from either a terraced area or balcony. Whilst relatively small in scale this type of outdoor amenity provision is not uncommon in built up areas such as these. There are also areas of landscaped space which appear to be available to serve the apartments but in most cases it is unclear whether these areas are to serve to individual apartment or as communal spaces which are open to all occupiers. In addition to internal floorspace, policy DE3 also makes reference to the scale and quality of outdoor private amenity space stating that developments will be assessed against the 'provision of useable amenity space, including gardens and outdoor amenity areas'. Paragraph 6.4.2.14 follows on from this stating that 'New

dwelling should make provision for external amenity/garden space where possible... As a guideline, a minimum space of... 10 square metres for apartments... will be sought'. Subject to some clarification from the applicant, it is possible that the development could achieve a policy compliant proposal in terms of the level of outdoor amenity space available for future occupants of the development.

In terms of the quality of internal spaces, the impact of noise, nuisance, visual intrusion, overlooking and privacy, light and air pollution are considerations in line with Policy DE3. The proposed blocks are relatively evenly spaced throughout the site. Separation distances between blocks range between 13m-24m due to the irregular footprints of each block. Where distances fall below 20-22m, which is generally recognised as an optimum separation distance to prevent inter-visibility between dwellings which are positioned back to back, the quality of the internal environment for future occupiers is compromised. In these instances the standard of residential amenity that would be achieved for these dwelling houses falls below the level that would normally be expected and is an indicator that the scale of development is excessive for this site and would constitute overdevelopment. Whilst this unacceptable impact on privacy could be partially mitigated through the inclusion of obscure glazing and/or high level windows, this would not help to mitigate other concerns regarding overdevelopment.

The distance between blocks is also a consideration in terms of light and the impact of overshadowing on the quality of internal and external spaces. Due to the height of the proposed block, it is likely that there will be some overshadowing of proposed residential units within the site. However in light of the orientation of the site, the position of the blocks within the site and the separation distances involved in relation to the height of the blocks, the internal residential environment in terms of light levels is considered acceptable. In relation to outlook, whilst the quality of the external environment within the site is not considered visually pleasing, the outlook available from residential units is considered acceptable and is not considered to be negatively impacted as a result of the height of these blocks and the separation distances between them.

Policy DE3 refers to the satisfactory provision of storage of containers for waste and recycling. Policy W1 of the Torbay Local Plan states that as a minimum, all developments should make provision for appropriate storage, recycling, treatment and removal of waste likely to be generated and with particular reference to residential developments, they should provide adequate space within the curtilage for waste and accessible kerbside recycle bins and boxes. Communal bin storage areas have been provided within the development along with a bin collection area. The Council's Waste Client Manager has confirmed that the proposals provide sufficient space for the storage of waste. The proposed bin storage facilities are considered acceptable and compliant with policy W1. It is however noted that waste collection will only occur on the public highway and not within the site. This has been considered further in later paragraphs.

Policy DE3 also refers to the satisfactory provision of off road parking provision and storage of cycles. This is considered in more detail in later paragraphs however it is noted that both on-site parking provision and cycle storage is provided at a ratio of 1 space per residential unit. However no visitor parking provision is provided which would be contrary to Policy TA3 and associated Appendix F. The level of cycle storage provision is compliant with Policy TA3 and associated appendix F and is secure and covered. Notwithstanding the lack of adequate parking provision on site, the location of parking spaces in close proximity to ground floor windows (particularly adjacent to blocks B and C) is a concern and is likely to impact upon the quality of the internal spaces by reason of privacy, light intrusion as a result of car headlights and noise and air quality as a result of cars manoeuvring into spaces that abut residential units. For these reasons the proposals are not considered to result in a good quality environment for potential occupiers of the proposed units and would be contrary to Policy DE3 of the Torbay Local Plan.

If approved, a condition requiring details of noise and sound insulation measures would be required in line with comments from the Council's Senior Environmental Health Officer.

Access and Parking Provision:

Access to the proposed development continues to be via Torquay Road. The proposal also includes the provision of a traffic island adjacent to the existing bus shelter. The Torbay Council Highway Design Guide provides guidance for visibility for Torquay Road, the A3022 which is a strategic route. The Highways Design Guide refers to the Design Manual for Roads and Bridges for strategic routes and recommends a 70m splay for 30mph strategic major roads. The existing use of the site, urban characteristics and lower speeds would help to provide some mitigation alongside an 85th percentile speed recording and therefore a minimum splay of 2.4m x 43m is required. In order to achieve a sufficient level of visibility at the access on to Torquay Road, some of the existing on street parking provision would need to be removed.

The Council's Highways team have objected to the proposed traffic island due to its impact on the free movement of traffic along Torquay Road which is part of the Torbay Major Road Network contrary to Policy TA2. The traffic island is proposed adjacent to the bus shelter, any bus picking up or dropping off at this shelter would hold up traffic on this already heavily congested road. In addition, as noted in the consultation response from the Council's Waste Client Manager, waste collection vehicles will not be able to enter the application site and therefore to serve the development collections will be made from Torquay Road. This would indicate that a standard refuse vehicle will be waiting on the Torquay Road preventing the free flow of traffic west bound on collection days. Therefore in line with the above, the proposal is considered to negatively impact on the wider highway network by causing congestion on the Torquay Road, part of the Torbay Major Road Network

contrary to Policy TA3 of the Torbay Local Plan.

In terms of the access to the site, whilst a suitable access can be achieved on to Torquay Road (subject to the adoption of a Traffic Regulation Order), the loss of on street parking provision as a result of achieving a suitable access, in addition to that lost as a result of the proposed traffic island is a concern. Since the use of the site as a public house ceased, from site visits it appears that the site has been operating as a car park for those working, visiting and/or living nearby. Whilst this remains unofficial, it does indicate that there is a need for parking locally which is supported by a number of public representations. It is noted that should the site be redeveloped, a number of cars will need to be relocated potentially to on-street locations adding to the existing heavy use of on street spaces. Policy TA3 states that the loss of on-street or public parking provision will be a material consideration in planning applications, with additional weight being given to loss of provision in those areas where there is congestion and/or heavy use of public or on-street spaces. It is considered that on-street parking spaces are already heavily used by existing residents which do not benefit from off street spaces and whilst unofficial, the car park on site is also heavily used. In light of this any additional loss of on-street spaces as a result of this development is not acceptable and would be contrary to Policy TA3 of the Torbay Local Plan.

As part of the proposal, 30 parking spaces are proposed on site to serve the development. This results in a parking ratio of 1 space per residential unit. Whilst this would comply with the guidelines set out in appendix F of the Torbay Local Plan, no provision is provided for visitors. Whilst it is recognised that this site is accessible by public transport and within walking distance of a number of community facilities, in light of the existing parking issues locally in terms of the heavy use of on-street parking spaces, it is considered that visitor provision must be provided on site. It is also recognised that without sufficient designated visitor parking on site and the lack of available on-street provision locally, that it could lead to unsociable and nuisance parking within the site leading to a more car dominated development that is already proposed by the current layout and scale of development. The proposal is not considered to provide appropriate provision of car spaces within the development and is likely to lead to on-street parking problems and unsociable and nuisance parking within the application site contrary to Policies DE3, TA3 and associated appendix F.

Electrical charging facilities and cycle parking have been provided and will comply with Policies DE3, TA3 and associated appendix F of the Torbay Local Plan.

Neighbouring Amenity:

Policy DE3 states that all development should not impact upon the amenity of neighbouring and surrounding uses. A number of concerns have been raised from nearby residents and the adjacent school in relation to the loss of privacy, light and the dominance of the development proposals. Where concerns have been raised about privacy, the applicant has revised the plans to include obscure glazing and

amendments to proposed balconies to prevent direct overlooking. Were this application to be recommended for approval, conditions could be imposed to secure obscure glazing where required. Where obscure glazing is not proposed, the distances between the proposed buildings and those to the north east and south east are in excess of 20m which is considered sufficient to prevent a loss of amenity by reason of loss of privacy.

In terms of loss of light, due to the orientation of the site and distances between buildings any impact is likely to be to those sites to the south west. In terms of the impact to 186 Torquay Road, the closest part of block A sits alongside number 186 and allows for a greater separation distance than is existing. The proposed footprint of block A then sits further away from the shared boundary of number 186 such that it is not considered to result in significant detriment to residential amenity by reason of loss of light. Block B and C then site alongside the boundary with Torbay School.

Concerns have been raised by the school in terms of safeguarding pupils and the opportunities for overlooking the site. Whilst such concerns are noted, due to the inclusion of obscure glazing and the orientation of the blocks which prevents direct overlooking, the proposals are not considered to result in significant detriment to the amenity of the occupants of the neighbouring school. To the rear of the site, it is noted that permission has been granted for a proposed multi use games area associated with Torbay School. Whilst the windows within the south east elevation and balconies within the north east elevation would provide opportunities to overlook this space, the plans indicate that these would overlook the access and parking areas to serve the site rather than the multi-use games area itself. Were the application to be considered acceptable, and should Member's consider this level of surveillance unacceptable, conditions could be imposed to require obscure glazing to dining areas and screening to balconies preventing overlooking from the elevation closest to the boundary. It is however noted that this relatively close relationship between the blocks and the shared boundaries of the site is another indicator that the scale of the development within the site is excessive and would constitute an overdevelopment.

Due to the height of block B and C, there is potential for there to be an impact on light levels within the Torbay School site. This is similarly the case in terms of the development being appearing unduly dominant or overbearing. The current boundary to the south west of the site is lined with tree screening creating a soft edge to the development. The proposed development will alter this relationship by removing the trees along the boundary and replacing them with pleached trees which are unlikely to achieve a similar affect in terms of height and screening without intensive and ongoing management. In light of this the proposed development is likely to be highly visible from the Torbay School site in comparison to the existing site which is screened by the existing trees. Since the original submission, both blocks B and C have been pulled back from the shared boundary with the school due to concerns regarding privacy, light and dominance. The

development however will continue to be visible from the Torbay School site due to the removal of established tree screening. Block B is skewed away from the boundary and has been pulled away from the boundary providing an 8-9m separation distance between the building and the playground of Torbay School. Whilst Block C sits parallel to the boundary with the school a 9m-16m separation distance is retained between buildings. It is acknowledged that there will be some impact where the proposed buildings are closest to the shared boundary as a result of the height of the buildings and the removal of the established vegetation which is likely to affect the quality of the playground and any rooms served by the windows in the north eastern elevation of the Torbay School building. However due to the separation distances involved, the extent of development closest to the boundary and the existing impact of tree screening on light levels to the neighbouring site, on balance the impact on light is not considered to warrant the refusal of the application. The impact of the buildings in terms of whether they are overly dominant has also been considered and whilst the replacement of established tree screening with pleached trees and built form will alter the outlook of the site, on balance having considered the separation distances involved this impact is not considered to warrant the refusal of the application. Nevertheless the proposal continues to be recommended for refusal for reasons of overdevelopment.

Concerns have been raised within public representations regarding noise and disturbance during the construction processes. Whilst concerns are noted, the construction process will be short lived and a condition can be imposed to secure a construction process which minimises disturbance for local residents. Were the proposals to be considered acceptable a condition requiring the submission of a construction method statement could be imposed.

Trees and Landscaping:

Policy C4 states that development will not be permitted when it would seriously harm, either directly or indirectly, protected or veteran trees, hedgerows or other natural features of significant landscape, historic or nature conservation. In addition this Policy states that development proposals should seek to retain and protect existing hedgerows, trees and natural landscape features wherever possible. Policy DE1 states that development proposals will be assessed against their ability to meet certain design considerations including the incorporation of existing trees and native species and the provision of high quality hard and soft landscaping.

The tree report submitted in support of the application states that the proposals will result in the loss of 25 of unprotected trees. It is also noted that cypress trees had been removed from the site prior to the consideration of the application. Only off-site trees along the north eastern boundary of the site are to be retained, two of which are protected by tree preservation orders. In line with comments from the Council's Arboricultural Officer, insufficient information has been submitted with the application to demonstrate that trees to be retained will be protected and will

not be under pressure for felling as a result of the proposed development. Information is required in relation to the constraints posed by off and on site trees in terms of debris fall, root asymmetry, height of trees in relation to shade paths, service run implications, tree spread, crown break, species and condition. The absence of this data prevents a detailed understanding of the site in terms of the requirement for mitigation planting. Methodology for the demolition of buildings and the surface change where trees pose a constraint would also be required. Due to the position of hard surfaces in close proximity to off-site trees, a negative impact upon root protection areas is likely to occur without this methodology to address any conflict. As such the proposal is considered contrary to Policies C4 and DE1 of the Torbay Local Plan.

In the event that this supporting information were submitted and demonstrated that the proposed development was achievable without detriment to retained trees off-site, there would be a requirement for replacement landscaping and other mitigation to off-set any harm and preferably achieve landscape and biodiversity improvements in line with Policy C4. Whilst additional landscaping is proposed in an attempt to mitigate the loss of existing landscaping, in line with comments from the Council's Arboricultural Officer, due to the scale, layout and footprint of the proposed development limited space is available for a sustainable landscaping other than in limited numbers and of short lived species. In light of this the proposal is considered unacceptable and would be contrary to Policies DE1 and C4 of the Torbay Local Plan.

Biodiversity:

The ecological survey states that the site has limited potential for bats and medium potential to support nesting birds. Both species were considered to be likely absent from the building on site. Were the proposals considered acceptable, conditions would be recommended to safeguard protected species and ensure the proposed landscaping results in a biodiversity enhancement. Conditions would include those relating to nesting bird season, the need for an update survey should development not start prior to August 2018, provision of bat and nesting bird roosts, no external lighting unless a scheme is submitted for approval and supervised felling of mature sycamore within the site. Subject to the inclusion of such conditions, the scheme is considered acceptable and compliant with policy NC1 of the New Torbay Local Plan.

Drainage:

The application site is within the Critical Drainage Area as designated by the Environment Agency. Policy ER2 requires all development to seek to minimise the generation of increased run-off, having regard to the drainage hierarchy, whereby surface water will firstly discharge to an adequate infiltration system, a main river or watercourse, a surface water sewer or highway drain or as a last resort a combined foul sewer where discharge is controlled to be at a greenfield discharge rate. The submitted information suggests that the site is not suitable for infiltration systems and that the only viable option is to discharge to the surface water/combined sewer. The submitted information suggest that discharge can be

controlled at a greenfield discharge rate however no detailed drainage design has been submitted. The lack of detailed drainage design is likely to prevent support for the scheme from the Council's Drainage Engineer. A consultation response has been requested from the Council's Drainage Engineer and the Members shall be updated at the Committee meeting.

Other Issues:

Policy SC1 of the Torbay Local Plan states that all major developments of 30 or more dwellings will be required to undertake a screening for a Health Impact Assessment and a full Health Impact Assessment if necessary, proportionate to the development proposed and to demonstrate how they maximise positive impacts on health and healthy living within the development and adjoining areas. Despite being requested during the course of the application, no health impact assessment screening has been submitted with the application. Whilst in line with Policy SC1, a screening is required, the information submitted in support of the application is considered sufficient to determine that a health impact assessment will not be required. However it is acknowledged that the development for the reasons outlined above will have implications for health in terms of noise, air quality and light disturbance as result of the proximity of block A to Torquay Road and the proximity of car parking spaces and manoeuvring spaces to residential units.

Policy SC4 of the Torbay Local Plan requires development schemes of 30 or more units to include provision for sustainable food production including allotments, proportionate to the scale of the development. In this case, the site is a brownfield site and constrained in terms of size, and the provision of meaningful on site food production is unlikely to be feasible. Were the application to be recommended for approval and include sufficient space for on-site landscaping orchard trees may be appropriate for inclusion as part of a landscaping scheme.

Human Rights and Equalities Issues:

Human Rights Act: The development has been assessed against the provisions of the Human Rights Act, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. This Act gives further effect to the rights included in the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests/the Development Plan and Central Government Guidance

Equalities Act: In arriving at this recommendation, due regard has been given to the provisions of the Equalities Act 2010, particularly the Public Sector Equality Duty and Section 149. The Equality Act 2010 requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. Protected characteristics are age, disability, gender reassignment, pregnancy and

maternity, race/ethnicity, religion or belief (or lack of), sex and sexual orientation.

Local Finance Considerations:

The proposal would result in the provision of 30 additional residential units which would attract new homes bonus. There would also be a benefit to the local economy as a result of the construction of the proposed development.

S106/CIL and Affordable Housing:

Affordable Housing:

Affordable housing provision is required from this development in accordance with Policy H2 of the Torbay Local Plan 2012-2030. 20% provision would be required which equates to 6 affordable dwellings on the basis of a third social rented, a third affordable rent and a third shared ownership. Commuted sums will only be accepted in exceptional circumstances where they would achieve more effective provision of affordable housing or bring significant regeneration benefits. In this instance no provision is proposed and the applicant has not underwritten the cost of an independent viability assessment. This therefore would represent a reason to refuse the proposals.

S106:

S106 contributions are required from this development in accordance with Policy SS5 and the Planning Contribution and Affordable Housing SPD. Where a proposal results in a loss of jobs, a commuted sum is required to help create similar employment elsewhere in Torbay. Loss of employment contributions will be given the highest priority after site deliverability and affordable housing matters. The number of jobs lost is based on evidence supplied by the applicant and the Employment Densities Guide (3rd Edition 2015 or subsequent) which estimates FTE jobs by floor area. On this basis the loss of employment contribution is calculated on the basis of number of jobs lost x £8,000 per full time equivalent. In the absence of any evidence from the applicant it is estimated that the loss of the public house will result in a loss of 8 equivalent full time jobs and therefore incurring a contribution of £64,000.

CIL:

The application is for residential development in zone 1 where the Community Infrastructure Levy (CIL) is £30 per square metre of additional gross internal floor area created. The existing gross internal area in lawful use for a continuous period of at least six months within the three years immediately preceding this grant of planning permission is 641.3m². The CIL liability for this development is £42,525. In line with the submitted CIL form, this is based on 1,417.5 net m² at £30 per m². This amount does not take into account any CIL exemption or relief that may be eligible.

EIA:

Due to the scale, nature and location this development will not have significant

effects on the environment and therefore is not considered to be EIA development.
Date: 31.07.2017

Proactive Working:

In accordance with paragraphs 186 and 187 of the National Planning Policy Framework the Council works in a positive and pro-active way with Applicants and looks for solutions to enable the grant of planning permission. However in this case the proposal is unable to meet the key policy tests and has therefore been refused.

Conclusions:

The proposals are not considered to accord with the provisions of the Torbay Local Plan 2012-2030. The proposals are considered contrary to Policies H1, H2, SS5, SS11, DE1, DE2, DE3, TA2, TA3, C4, ER1, ER2 and appendix F of the Torbay Local Plan 2012-2030 for the following reasons:

- 1) The proposal would constitute an overdevelopment of the site and fails to deliver a high quality design and good standard of amenity for future occupants as a result of poor quality landscaping, poor design and layout of buildings, poor parking arrangements and lack of visitor parking provision contrary to paragraph 17, 56 and 58 of the National Planning Policy Framework and Policies SS11, H1, DE1, DE2, DE3, C4 and TA3 and associated Appendix F of the Torbay Local Plan 2012-2030;
- 2) The application has the potential to detrimentally impact trees protected by Tree Preservation Orders and result in the removal of several unprotected trees. In the absence of a sufficiently detailed tree survey, no proper assessment can be made of the loss, impact and necessary mitigation that is required. The proposed development is contrary to Policies C4 and DE1 of the Torbay Local Plan 2012-2030.
- 3) The application site is within a Critical Drainage Area and Flood Zone 1. In the absence of a sufficiently detailed surface water drainage design, no proper assessment can be made of the impact of surface water run off or the drainage hierarchy. It is therefore unclear whether the proposed development or surrounding area could be kept safe from the effects of surface water. The proposal would not comply with Policies ER1 and ER2 of the Torbay Local Plan 2012-2030.
- 4) The proposed traffic island on Torquay Road, part of the Torbay Major Road Network will detrimentally impact the wider highway network by causing congestion and preventing the free flow of traffic contrary to Policy TA2 of the Torbay Local Plan 2012-2030. The proposed traffic island will result in the loss of on-street parking spaces on the northern side of Torquay Road in an area where on-street parking is heavily used contrary to Policy TA3 of the Torbay Local Plan 2012-2030.
- 5) The proposal will intensify the use of the existing access during peak hours and would require a minimum splay of 2.4m x 43m. The proposed access would not provide a satisfactory standard of visibility contrary to Policy TA2 of the Torbay Local Plan. A suitable access could only be achieved through

- the removal of a number of on-street parking spaces which would be contrary to Policy TA3 of the Torbay Local Plan 2012-2030.
- 6) In the absence of any signed legal agreement or upfront payment under Section 106 of the Town and Country Act 1990 (as amended), the scheme fails to satisfy the objectives of Local Plan Policy SS5 which seeks to mitigate the loss of employment to make it acceptable in spatial planning terms. In the absence of secured contributions in line with the adopted policy or an independent viability assessment to justify a lower level of contributions, the proposal is contrary to Policy SS5 of Torbay Local Plan 2012-2030, the Council's Planning Contribution and Affordable Housing SPD and guidance outlined within paragraphs 203 and 204 of the National Planning Policy Framework.
 - 7) The proposal fails to make appropriate provision for affordable housing in line with Policy H2 of the Torbay Local Plan 2012-2030 and in the absence of the an independent viability assessment to justify a lower level of affordable housing provision the proposal is contrary to Policy H2 of the Torbay Local Plan 2012-2030.

Condition(s)/Reason(s)

01. The proposal would constitute an overdevelopment of the site and fails to deliver a high quality design and good standard of amenity for future occupants as a result of poor quality landscaping, poor design and layout of buildings, poor parking arrangements and lack of visitor parking provision contrary to paragraph 17, 56 and 58 of the National Planning Policy Framework and Policies SS11, H1, DE1, DE2, DE3, C4 and TA3 and associated Appendix F of the Torbay Local Plan 2012-2030;
02. The application has the potential to detrimentally impact trees protected by Tree Preservation Orders and result in the removal of several unprotected trees. In the absence of a sufficiently detailed tree survey, no proper assessment can be made of the loss, impact and necessary mitigation that is required. The proposed development is contrary to Policies C4 and DE1 of the Torbay Local Plan 2012-2030.
03. The application site is within a Critical Drainage Area and Flood Zone 1. In the absence of a sufficiently detailed surface water drainage design, no proper assessment can be made of the impact of surface water run off or the drainage hierarchy. It is therefore unclear whether the proposed development or surrounding area could be kept safe from the effects of surface water. The proposal would not comply with Policies ER1 and ER2 of the Torbay Local Plan 2012-2030.
04. The proposed traffic island on Torquay Road, part of the Torbay Major Road Network will detrimentally impact the wider highway network by causing congestion and preventing the free flow of traffic contrary to Policy TA2 of

the Torbay Local Plan 2012-2030. The proposed traffic island will result in the loss of on-street parking spaces on the northern side of Torquay Road in an area where on-street parking is heavily used contrary to Policy TA3 of the Torbay Local Plan 2012-2030.

05. The proposal will intensify the use of the existing access during peak hours and would require a minimum splay of 2.4m x 43m. The proposed access would not provide a satisfactory standard of visibility contrary to Policy TA2 of the Torbay Local Plan. A suitable access could only be achieved through the removal of a number of on-street parking spaces which would be contrary to Policy TA3 of the Torbay Local Plan 2012-2030.
06. In the absence of any signed legal agreement or upfront payment under Section 106 of the Town and Country Act 1990 (as amended), the scheme fails to satisfy the objectives of Local Plan Policy SS5 which seeks to mitigate the loss of employment to make it acceptable in spatial planning terms. In the absence of secured contributions in line with the adopted policy or an independent viability assessment to justify a lower level of contributions, the proposal is contrary to Policy SS5 of Torbay Local Plan 2012-2030, the Council's Planning Contribution and Affordable Housing SPD and guidance outlined within paragraphs 203 and 204 of the National Planning Policy Framework.
07. The proposal fails to make appropriate provision for affordable housing in line with Policy H2 of the Torbay Local Plan 2012-2030 and in the absence of the an independent viability assessment to justify a lower level of affordable housing provision the proposal is contrary to Policy H2 of the Torbay Local Plan 2012-2030.

Informative(s)

01. In accordance with the requirements of Article 35(2) of the Town and Country Planning (Development Management Procedure) (England) Order, 2015, in determining this application, Torbay Council has attempted to work proactively and positively with the applicant to attempt to resolve the planning concerns the Council has with the application. However, in this instance the proposal was unable to meet the key policy tests of Policies H1, H2, SS5, SS11, DE1, DE2, DE3, TA2, TA3, C4, ER1 and ER2 and appendix F of the Torbay Local Plan 2012-2030 and as such the application has been refused.

Relevant Policies

H1LFS - Applications for new homes_

H2 - New housing on unidentified sites

SS5 - Employment space

SS11 - Sustainable Communities Strategy

SS12 - Housing
C4 - Trees, hedgerows and natural landscape
DE1 - Design
DE3 - Development Amenity
TA2 - Development access
TA3 - Parking requirements
ER1 - Flood Risk
ER2 - Water Management
NC1LFS - Biodiversity and Geodiversity
SDP1 - Paignton
SC1 - Healthy Bay
SC4 - Sustainable food production