

**Application Number**

P/2016/1123

**Site Address**Claylands' Cross Site  
Brixham Road  
Paignton**Case Officer**

Carly Perkins

**Ward**

Goodrington With Roselands

**Description**

Hybrid Application: Full Planning Application for alterations to Claylands Cross junction to create an access to the site, access roads within the site including related infrastructure, drainage and earth retaining works. Outline Application with all matters reserved except access for the erection of two buildings to provide four industrial B8 (storage and distribution) and B1 (business) units including car parking areas, loading yards and a central service road.

**Executive Summary/Key Outcomes:**

The application site relates to a vacant brownfield site which has been previously used as a waste transfer facility for inert construction products and for temporary storage of highways maintenance materials for the Local Authority. The site is now vegetated and towards the edge of the site are areas of woodland; five badger setts are located within the site. The site is located to the east of Brixham Road (part of the Torbay Major Road Network), south of Tweenways junction. The site is located at a higher level than Morrison's superstore to the north and Paignton Zoo to the east.

The site is identified as a potential development site for consideration in the Neighbourhood Development Plan, primarily for employment investment. The site is within the Critical Drainage Area as designated by the Environment Agency. The site is within Greater Horseshoe Bat Sustenance Zone and a Strategic Flyway. The site is adjacent to an Urban Landscape Protection Area, Core Tourism Investment Area, Ancient Woodland and Other Site of Wildlife Interest.

The application is a hybrid application, consisting of both proposals for full planning permission and outline permission. Full planning permission is requested for alterations to Claylands Cross junction to create an access to the application site, access roads within the site including related infrastructure, drainage and earth retaining works. Outline planning permission is requested with all matters reserved except access for the erection of two buildings which

would be subdivided to provide four industrial B8 (storage and distribution) and B1 (business) to include car parking areas, loading yards and a central service road.

The outline submission specifies provision of 10,635sqm of industrial (B1a, B1c and B8 use classes) floor space. The indicative plans submitted show two buildings to accommodate 4 separate units. The layout plans show the two buildings separated by the spine road and on two separate levels, which reflects a level change on the site. Each building is served by a loading yard and car park area. The proposals include 172 parking spaces of which 8 are noted as being for disabled people. 20 cycle spaces are also proposed and pedestrian access is proposed into the adjacent play park.

The site is identified within the Torbay Local Plan (SDP3.3) as a key site for employment providing 6.8ha of employment land which is deliverable early in the plan period. The site is noted as a potential development site for consideration in the Neighbourhood Development Plan for employment investment. Policies SS4 and SS5 of the Torbay Local Plan 2012-2030 support the provision of new employment space and the improvement of existing employment space in West Paignton to support the creation of additional jobs. Similarly policies SDP1 and SDP3 support the creation of a range of employment opportunities in this area. The application is supported by the Council's Economic Strategy 2013-2018. The Torbay Development Agency supports the application to bring forward new employment space within Torbay and is promoting this application. In line with the above, the principle of industrial development in this location is considered acceptable and compliant with local plan policy.

Employment uses in this location are supported by local policies where employment growth and jobs provision is required to complement house building in the locality. There is strong planning policy support for the proposed employment use which is recognised as being important to delivering the Local Plan's growth strategy. An objection to the proposed development has been received from the Environment Agency. This needs to be addressed before planning permission can be granted. A Habitats Regulation Screening is required to assess the impact of the development on the likely significant effect on the integrity of the South Hams SAC. Subject to the resolution of issues relating to groundwater, landscaping, highways, biodiversity, noise and lighting the application is supported and considered acceptable.

**Recommendation:**

Conditional approval subject to submission of a Habitats Regulation Assessment (Screening) that concludes the proposed development would not have a likely significant effect on the South Hams SAC, the submission of additional information about groundwater, landscaping, highways, biodiversity, noise,

lighting and securing financial contributions where necessary. Final drafting of conditions to be delegated to the Executive Head of Business Services.

Conditions will relate to the following:

1. Reserved Matters
2. Construction Method Statement
3. Contamination
4. Surface Water Drainage
5. Travel Plan and Freight Plan
6. Parking Provision
7. Cycle Storage and Bin Storage
8. CEMP
9. LEMP
10. Development to proceed in accordance with recommendations of Ecology Surveys
11. Tree Protection
12. Landscaping
13. Ground Water
14. External Lighting
15. Operating Hours
16. Sound Mitigation
17. No external storage
18. Finished floor levels
19. Boundary treatment
20. Phasing
21. Secured by design
22. Freight plan
23. Waste Management

Statutory Determination Period: 13 weeks which expires on 19th January 2017.

**Site Details:**

The application site relates to a vacant brownfield site which has been previously used as a waste transfer facility for inert construction products and for temporary storage of highways maintenance materials for the Local Authority. The site is now vegetated and towards the edge of the site there are areas of woodland. Five badger setts are located within the site. The site is located to the east of Brixham Road (part of the Torbay Major Road Network), south of Tweenways junction. The site is located at a higher level than Morrison's superstore to the north and Paignton Zoo to the east.

The site is identified as a potential development site for consideration in the Neighbourhood Development Plan, primarily for employment investment. The site is within the Critical Drainage Area as designated by the Environment

Agency. The site is within Greater Horseshoe Bat Sustenance Zone and a Strategic Flyway. The site is adjacent to an Urban Landscape Protection Area, Core Tourism Investment Area, Ancient Woodland and Other Site of Wildlife Interest.

### **Detailed Proposals:**

The application is a hybrid application, consisting of both proposals for full planning permission and outline permission. Full planning permission is requested for alterations to Claylands Cross junction to create an access to the application site, access roads within the site including related infrastructure, drainage and earth retaining works. Outline planning permission is requested with all matters reserved except access for the erection of two buildings to provide four industrial B8 (storage and distribution) and B1 (business) to include car parking areas, loading yards and a central service road.

The buildings are proposed in outline and would provide 10,635sqm of industrial (B1a, B1c and B8 use classes) floor space. The indicative plans submitted show two buildings to accommodate 4 separate units. The layout plans show the two buildings separated by the spine road and on two separate levels, which reflect existing ground levels on the site. Each building is served by a loading yard and car park area. The design and access statement submitted with the application indicates that the buildings will be built as a series of steel portals with lightweight steel or aluminium panel cladding. The buildings are indicated as being no higher than 9m, featuring a parapet roof for maintenance safety. This detail is indicative only at this stage and would be agreed in the submission of the reserved matters application.

The proposals include 172 parking spaces of which 8 are noted as being for disabled people. 20 cycle spaces are also proposed and pedestrian access is proposed into the adjacent play park.

### **Summary of Consultation Responses:**

*Environmental Health (Contamination):* Due to the historical use of the site as landfill and the results of the soil testing which indicate an unacceptable level of contamination, a condition is recommended to ensure that the site is fit for the end user. This condition will require submission of a remediation scheme, the implementation of the approved remediation scheme and the reporting of unexpected contamination.

*Arboricultural Officer:* The site layout as proposed, if approved, will lead to the loss of a significant proportion of category A woodland W5 and of category B Group G6. The proposal when viewed from the A3022, Borough Road and retail units to the west form part of an extensive green wedge of Clennon Valley. The importance of this visual receptor is further amplified due to the junction between

the A3022 and Borough Road and the traffic lights at Battersway Road. As shown in submitted photomontages the buildings are highly visible from Diptford Close and thus this visual receptor would see a significant degree of change in the visual landscape with the development visually separating the Claylands site from Primley woods. As such W5 should be given greater protection and reinforcement planting capable of attaining a significant height and spread. Trees within G6 and W5 currently pose a significant constraint to the development, however when considered in the context of expected tree longevity against anticipated length of usage, a measured and pragmatic solution to achieving landscape continuity, screening benefits, ecological enhancements and storm water resilience should form part of the decision making process. Minimal planting is proposed along the southern boundary with the properties on Harbourne Avenue (33, 35, 37, 39, 41, 43); this is deemed insufficient given the potential adverse affects of noise and light pollution on the residents. Approval is recommended on arboricultural merit subject to the applicant supplying details to address the points noted above.

*Landscape Consultant:* The character of the proposed development is likely to sit well within the context of other large sheds in the area. The existing woodland fringe that surrounds the site, for which additional planting is proposed, will provide a cohesive frame that connects with other areas of woodland in the landscape to produce a strong green infrastructure that will help to unite the diverse characteristics of development in the area. The topography and surrounding woodland planting mean that the buildings are unlikely to be seen from much of the immediate landscape. The roof of the buildings are likely to be visible from the higher ground to the south and could spoil the view from the housing area, particularly in the short term before the additional screen planting has matured. Careful roofing design using dark recessive colours and non-reflective patina could help to reduce the visual impact. The creation of a hedgebank along the boundary with the playground would help to reinforce the screening in this area.

*Green Infrastructure Coordinator:* It is recommended that as part of the application the existing brambles and scrub within the red line boundary to the west of the playground are removed, the area regraded to match that of the rest of the playground and the fence line relocated along the Brixham Road to help increase surveillance of the playground. It is also recommended that trees are planted along Brixham Road to enhance the visual amenity value of this area. To help screen the new access into the development site from the existing residential properties on Harbourne Avenue, it is recommended that a new hedgebank be constructed between the northern boundary of the playground and the new access road. The proposed access gate to the playground from the industrial estate is welcomed. A greenspace and recreation contribution of £15,000 is requested to allow improvements to the playground/open space to be undertaken. A HRA screening will be required due to the location of the development within the Greater Horseshoe Bat Sustenance Zone and partly

within the Strategic Flyaway. Revisions are requested to the various ecological reports including the need for firm mitigation proposals. A specific Invertebrate Survey is required to be submitted prior to determination. A £10,000 contribution towards enhancing opportunities for Greater Horseshoe Bats is requested.

*Drainage Engineer:* Following review of additional information submitted, providing that the surface water drainage scheme is constructed in accordance with the latest submission there are no objections on drainage grounds.

*Senior Strategy and Project Officer (Transport):* There is strong planning policy support for the proposed employment use, which is important to delivering the Local Plan's growth strategy.

There are however outstanding matters regarding the operation of the junction with Brixham Road at the PM peak which need to be addressed. Subject to further information being submitted, it is not considered that these issues would warrant the refusal of the application as they would not be significantly severe. A travel plan is welcomed; this should seek to achieve at least 30% of employee trips being made by sustainable modes of transport. A freight plan should also be prepared to help alleviate the junction impacts by avoiding commercial vehicle movements to and from the site during peak times. A travel plan should be secured by condition.

The level of parking provision is policy compliant however 17 disabled spaces should be provided rather than the 8 proposed. Consideration should also be given to electrical charging points. Cycle parking is welcomed and should be secured and covered. The estate road is intended for adoption and should be constructed in accordance with the Highways Design Guide. Details of lighting will be required. Footpaths on site are welcomed. The existing crossing is to be moved, a Section 278 agreement will be required to secure these works and the additional arm to the junction and other forthcoming improvements to the Western Corridor.

*Police Designing Out Crime Officer:* Industrial buildings can be vulnerable to criminal activity, specifically with regard to portable and desirable goods with a ready market value for disposal, such as plant, machinery, raw materials, personal computers, laptops etc. Other crimes can occur include acts of vandalism, such as graffiti and arson. As such in the event planning permission is granted, it is recommended the development is constructed to achieve Secured by Design compliance to ensure a consistent level of security throughout and opportunities for crime, fear of crime and ASB are minimised.

*Natural England:* Natural England advise that the Claylands site provides limited potential for Greater Horseshoe Bat activity due to its urban location and poor connectivity to the surrounding countryside. There is no objection.

*Environment Agency:* The Environment Agency has raised an objection to the proposal because there is insufficient information to demonstrate that the risk of pollution to controlled waters is acceptable. Comments have also been made regarding the Critical Drainage Area designation and flood risk.

*Torbay Development Agency:* The application is supported by the Torbay Development Agency and aligns with the Torbay Corporate Plan, Employment Land Review, Economic Strategy and Local Plan.

*Environmental Health (Noise):* Comments are awaited.

*Ecological Consultant:* Comments are awaited.

**Summary Of Representations:**

1 representation and 1 petition (21 signatures) have been received. Issues raised:

- impact on visual amenity
- noise and pollution
- light pollution
- impact on residential amenity
- need to improve play park
- impact on local streets as a result of overspill parking from the development
- impact on badgers as a result of relocation of the sett
- impact on the highway

These representations have been sent electronically for Members consideration.

**Relevant Planning History:**

P/2002/1561	Proposed parking area for servicing gas governor APPROVED 12/11/2002
P/2001/1684	Storage of disused refrigerators (also involving removal of some non-leakable CFCs) APPROVED 12.04.2002
P/1988/2131	Use as offices and laboratory accommodation APPROVED 19.12.1988

**Key Issues/Material Considerations:**

The key issues to consider are the principle of development, appearance, impact on visual amenity, landscaping, biodiversity, drainage, access, parking and residential amenity.

### Principle:

The site is identified within the Torbay Local Plan (SDP3.3) as a key site for employment providing 6.8ha of employment land which is deliverable early in the plan period. The site is noted as a potential development site for consideration in the Neighbourhood Development Plan for employment investment. Policies SS4 and SS5 of the Torbay Local Plan 2012-2030 support the provision of new employment space and the improvement of existing employment space in West Paignton to support the creation of additional jobs. Similarly policies SDP1 and SDP3 support the creation of a range of employment opportunities in this area. . In line with the above, the principle of development in this location is considered acceptable and compliant with local plan policy.

### Appearance, Scale and Layout:

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 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, whether they protect local and longer distance views and the impact on the skyline especially from public vantage points, having regard to the location and prominence of the site and whether they positively enhance the built environment.

In line with the comments from the Landscape Officer, the existing woodland fringe that surrounds the site, which is to be enhanced, provides a cohesive boundary to connect the site to other areas of woodland nearby continuing to provide a strong green corridor between this site and those to the east and south east.

Due to the topography and existing screening the site is unlikely to be visible from much of the surrounding area with the exception of Brixham Road and from the south, particularly Diptford Close. The changes to the junction and topography of the site will urbanise the appearance of the site and open it up to views from Brixham Road. Whilst the character of the site will change as a result of the proposal, the changes are not considered to be out of character with the locality, with the site being located on a major road network and in close proximity retail, industrial and residential developments. The scale of the buildings proposed is similar to the warehouse buildings on the opposite side of the road and the adjoining supermarket. This scale of development would be appropriate in this urban location subject to mitigation through a robust landscape scheme. There are opportunities for further landscaping particularly to the Brixham Road frontage and to the south of the site alongside the boundary with the play park to help screen the development from Brixham Road

and help to maintain a green setting to the site.

The road network within the site is covered by the full application adopts asphalt to all road surfaces, which is considered typical of industrial estates. Parking areas and service yards are noted as concrete and permeable paving however the design of these areas is reserved. The design of the buildings, service yards and parking areas are for outline permission only and therefore the design, layout and scale of the development will be subject to further consideration at a later reserved matters stage. However the layout of the estate roads will dictate general locations of development within the wider site. Comments from the Landscape Officer regarding the colour of roofs due to their visibility will need to be a consideration of later reserved matters applications. The scale of the buildings as shown on the submitted feasibility plans is considered to sit comfortably with the wider site, with similar sized buildings nearby. The topography of the site allows the buildings to be set down from Brixham Road level, reducing the impact of the building in views from Brixham Road. There are also opportunities for additional landscaping to the Brixham Road frontage as noted in consultation responses from the Council's Arboricultural Officer and Green Infrastructure Coordinator.

If approved, a condition requiring the development to meet Secured by Design standards will be imposed as recommended by the Police Designing Out Crime Officer.

Landscaping:

The full application covers only the access roads into the site, the junction and drainage works, there are some elements of landscaping included within the areas of the site covered by this application. However within the application submission a landscape mitigation plan has been included which covers the whole site. As noted above there are opportunities for further landscaping which are required to help screen the development and better integrate the site with its surroundings. Additional information is to be submitted in response to these consultation responses. The Members will be verbally updated at the Committee Meeting.

Biodiversity:

The Conservation of Habitats and Species Regulations 2010 imposes on local authorities the duty imposed by the EU Habitats Directive to ensure that plans or projects will not adversely affect European Sites such as SACs. In order to fulfil this duty, the authority must carry out a Habitats Regulation Assessment ('HRA') process. A screening is being carried out for the development by the Council's Ecological Consultant, the results of this screening is awaited and the results will be presented at the Committee Meeting.

Paragraph 118 of the National Planning Policy Framework (NPPF) states that in terms of biodiversity, if significant harm resulting from a development within a

SAC cannot be avoided, adequately mitigated, or as a last resort, compensated for, then planning permission should be refused.

Advice from Natural England suggests that the development is unlikely to result in significant effects upon the South Hams SAC due to the urban location of the site despite the fact that the site is located within the Sustenance Zone and partly with a Strategic Flyway. Comments from the Council's Ecologist are awaited. The Council Green Infrastructure Coordinator has made several requests for further information to demonstrate that the proposals comply with both local and national policy. Further consultation will be carried out with relevant consultees following the submission of this information. The Members will be updated at the Committee Meeting.

Ecological surveys were undertaken in 2015, during these surveys five badger setts were recorded on site. It is noted within the submitted Badger Mitigation Report that other scrub and grassland habitats on the site provide good foraging and commuting opportunities for badgers. In 2016, a wider off site habitat survey was carried out which identified an extensive main sett within the Paignton Zoo site. The proposals have been designed to retain areas of highest ecological value for foraging and commuting badgers. The main sett on site cannot be retained with the proposed development and therefore a relocated new sett is proposed. The mitigation sett is proposed within the woodland habitats and is located within a natural clearing to avoid tree loss. The sett will be left to establish for a minimum of 6 months before the main sett is closed. Monitoring works are proposed to establish whether the new sett has been used by badgers, once activity is confirmed the main sett will be closed under licence. In line with comments from the Council's Green Infrastructure Coordinator, the badger sett poses a significant constraint to the development and therefore the proposed location will be required prior to determination and the applicant's ecologist will need to confirm that this is a suitable location for the sett. The Members will be updated on this point at the Committee Meeting.

#### Residential Amenity:

The proposals are to be sited to the north and south of existing residential developments. 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 and a good standard of amenity for all existing and future occupants of land and buildings. Policy DE3 of the Torbay Local Plan 2012-2030 states that developments should be designed to not unduly impact upon the amenity of neighbouring and surrounding uses, with one of the criteria for assessment being the impact of noise, nuisance, visual intrusion, overlooking and privacy, light and air pollution. The proposals are separated from existing residential dwellings by existing planting and areas of open space. Due to the separation distances involved the proposals are not considered to result in any serious detriment to residential amenity in terms of loss of light or by reason of being unduly dominant or overbearing. There are

however issues with the intensified use of the site and the impact of that on residential amenity in terms of traffic noise, noise from the operation of the site and light nuisance. Final comments are awaited from the Environmental Health Officer in terms of the impact of the development in terms of noise. Initial comments from the Environmental Health Officer suggest that there is the potential for noise nuisance as a result of the development however it is considered likely that this can be successfully mitigated through the use of operating hours restrictions, acoustic fencing, sound proofing etc. It is also considered that the topography of the site and existing and proposed landscaping could help to mitigate the impacts of the development. The Members will be updated on this at the Committee Meeting. This response will also consider the impact of the development in terms of light pollution, it is however considered likely that if issues exist these can be successfully mitigated through changes to lighting design, screening and/or restrictions on hours of use.

#### Drainage:

The surface water drainage proposals are to attenuate the surface water using a mixture of cellular storage and concrete tanks, using flow controls to reduce discharge rates. Foul water drainage is to be discharged to the combined sewer. The proposals do not increase flood risk elsewhere and the Council's Drainage Engineer has confirmed that the proposals are acceptable.

The Environment Agency has raised an objection to the application as insufficient information has been submitted to demonstrate that the risk of pollution to controlled waters is acceptable. Further information is expected from the applicant to resolve this issue and the Members will be updated at the Committee meeting.

#### Contamination:

The application site has been previously used as a waste transfer facility for inert construction products and for temporary storage of highways maintenance materials for the Local Authority. Soil testing has been carried out at the site and indicates an unacceptable level of contamination. In light of this a condition has been recommended to require the submission of a remediation scheme, the implementation of the approved remediation scheme and the reporting of unexpected contamination. Paragraph 109 of the National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local environment by remediating and mitigating contaminated land where appropriate and subject to the inclusion of this condition, the development of this site is considered acceptable and compliant with this paragraph and policy ER3 of the Torbay Local Plan 2012-2030.

#### Access and Parking:

Access to the site is via Brixham Road and works to the junction at Claylands Cross are proposed. The works include an additional fourth arm to the signalised junction, an extension to the footway from the junction to the site on both sides of

the carriage way and a pedestrian crossing with dropped kerbs. The proposal includes 172 parking spaces, 8 of which are proposed for disabled persons, in addition 20 cycle parking spaces are proposed. A number of issues have been raised by the Council's Senior Strategy and Project Officer in relation to the submitted Transport Assessment which require further responses from the applicant. The submitted Transport Assessment relies on data which pre-dates the use South Devon Highway; data from traffic monitoring cameras suggest that there has been a 15% increase in traffic on the Western Corridor since the new road opened in 2015. This information has not been taken into account in the assessment of the junction on Brixham Road and needs to be considered. In addition the Transport Assessment notes that the new junction will operate at 93% capacity at PM peak (without the South Devon Highway's impact being factored into the modelling). This is assessed to result in queues of up to 35 vehicles on the Brixham Road. This has raised particular concern from the Council's Highways Engineers.

Whilst it is not considered that the impact of the development on the highway network would be severe in relation to paragraph 32 of the National Planning Policy Framework, to ensure that the development does not unduly impact on the highway network and that a safe access is provided, further information is required. There are ongoing discussions between the applicants and officers and the Members will be updated further at the Committee Meeting.

The number of parking spaces is considered to be compliant with policy TA3 of the Torbay Local Plan 2012-2030. However revisions are required in terms of the number of disabled spaces which is below the policy requirement. If approved, a number of the spaces will need to include electrical charging points which can be secured by condition. The proposal includes 20 cycle parking spaces which is considered acceptable. These must be covered and secure and these will be secured by condition if approved. A travel plan is proposed and this should seek to achieve at least 30% of employee trips being made by sustainable modes of transport. A travel plan and freight plan to help alleviate the junction impacts by avoiding commercial vehicle movements during peak times will be secured by condition if approved. Details of lighting are awaited and further consultation will be carried out following the submission of these details.

**S106:**

Contributions have been requested by consultees relating to the improvement of the adjacent play park (£15,000) and enhancing opportunities for local greater horseshoe bats (£10,000). These contributions will need to comply with the Community Infrastructure Levy and the National Planning Policy Framework being necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. Further consultation responses are awaited from the Council's Ecological Consultant which will consider whether contributions in relation

enhancing opportunities for Greater Horseshoe Bats are justified in light of responses from Natural England. Further consideration will be given to the request for play park improvements and whether these contributions would meet the tests set out in the legislation. The Members will be updated on this at the Committee Meeting.

As site is Council owned land it is not possible to enter into a section 106 agreement. Should it be considered that such contributions are necessary, relevant and proportionate to the development, such contributions can be secured via unilateral undertaking.

### **Conclusions:**

Employment uses in this location are supported by local policies where employment growth and jobs provision is required to complement house building in the locality. There is strong planning policy support for the proposed employment use which is recognised as being important to delivering the Local Plan's growth strategy.

A number of issues are outstanding. These are currently being considered further by the applicant and further information is expected to resolve these issues. Subject to the resolution of issues relating to groundwater, landscaping, highways, biodiversity, noise and lighting the application is supported and considered acceptable.

### **Condition(s)/Reason(s)**

01. Reserved Matters
02. Construction Method Statement
03. Contamination
04. Surface Water Drainage
05. Travel Plan and Freight Plan
06. Parking Provision
07. Cycle Storage and Bin Storage
08. CEMP
09. LEMP
10. Development to proceed in accordance with recommendations of Ecology Surveys
11. Tree Protection
12. Landscaping
13. Ground Water
14. External Lighting
15. Operating Hours
16. Sound Mitigation
17. No external storage
18. Finished floor levels

19. Boundary treatment
20. Phasing
21. Secured by design
22. Freight plan
23. Waste Management

**Relevant Policies**

- SDP3 - Paignton North and Western area
- SS4 - The economy and employment
- SS5 - Employment space
- SDP1 - Paignton
- DE1 - Design
- DE3 - Development Amenity
- ER1 - Flood Risk
- ER2 - Water Management
- ER3 - Contamination
- NC1LFS - Biodiversity and Geodiversity\_
- SS8 - Natural Environment
- C4 - Trees, hedgerows and natural landscape
- TA1 - Transport and accessibility
- TA2 - Development access
- TA3 - Parking requirements
- SS7 - Infrastructure, phasing and employment