

neighbourhood plans

From: Adam Billings [REDACTED]
Sent: 17 December 2017 21:11
To: neighbourhood plans
Cc: Planning; Luscombe, Adam; Stockman, Jackie
Subject: Brixham Neighbourhood Forum - Regulation 16 submission
Attachments: Appendix 1 - Ecology.pdf; Brixham Forum Regulation 16 representation.pdf

On behalf of the Brixham Peninsula Neighbourhood Forum please see attached:

- letter; and
- appendices

Many thanks,



Brixham Town Council
Town Council Office,
Brixham Town Hall
New Road,
Brixham,
TQ5 8TA

www.brixhampeninsula.com

By email to:

neighbourhood.plans@torbay.gov.uk

Neighbourhood Plans

Torbay Council

Friday, 15 December 2017

Dear Independent Assessors (as yet unknown),

**Re: Torquay Neighbourhood Plan;
Paignton Neighbourhood Plan; and
Brixham Peninsular Neighbourhood Plan**

This letter of representation is made in response to the Regulation 16 consultation being carried out by Torbay Council on the above plans that requires all responses to be submitted by no later than 9:00am on Monday 18 December 2017.

As a result of the re-designation of all three Neighbourhood Forums following a unanimous vote at the Full Council meeting of Torbay Council on 7 December 2017, the Brixham Peninsula Neighbourhood Forum is the designated "approved body" for the submitted Brixham Peninsula Neighbourhood Plan and designated Neighbourhood Area.

General

On 14 December 2017 our Forum confirmed that the proposals contained in the submitted Neighbourhood Plans for both Torquay and Paignton are consistent with and complimentary to the proposals contained in the submitted Brixham Peninsular Neighbourhood Plan (hereafter "the Neighbourhood Plan").

The Forum therefore supports the proposals contained in all three submitted Neighbourhood Plans and wishes to participate in all Hearings held into any of the three submitted Plans.

Specific representation re the Brixham Peninsula Neighbourhood Plan

In addition to the general support our Forum wishes to provide to the Neighbourhood Plan as set out above, considering the very long period which has now elapsed since submission

on 18 August 2017, we wish to use this opportunity to bring to the attention of the Assessor new information which has now become available during the interim period. This information is as follows:-

Waterside Quarry site (H3 – I10) – Additional Ecology evidence

Page 17 of the Addendum Ecological Survey Report by Greena Ecological Consultancy which is included as Appendix D to the Habitat Regulations Assessment Screening by Aecom, one of the supporting documents to the Neighbourhood Plan, records that "Further surveys will continue between July and September inclusive in order to provide the full picture of bat activity on site throughout the bat active season" for Waterside Quarry.

These surveys have now been completed and the results are contained in Appendix 1.

Having been so advised, the Forum considers the fact that no Annex II species were recorded on the site either in October 2015 or throughout the entire bat active season of 2017 is evidence that the site is suitable for allocation in the Neighbourhood Plan.

White Rock Extensions site (H3 – R7): planning application

Subsequent to Regulation 16 Publication of the Neighbourhood Plan, a planning application has come forward for a site which was considered for development in the Neighbourhood Plan but was rejected.

The planning application is P/2017/1133 and the site is referred to by the developer as Inglewood. The site is referred to in the Neighbourhood Plan as site H3 – R7 White Rock Extensions. For ease of reference it is noted many of the community also refer to this site as White Rock II. Further information regarding the reasons for rejecting this site are set out on page 82 of the Housing Site Assessment.

For these reasons, the Brixham Peninsula Neighbourhood Forum and Brixham Town Council have submitted a joint letter of representation objecting to the planning application.

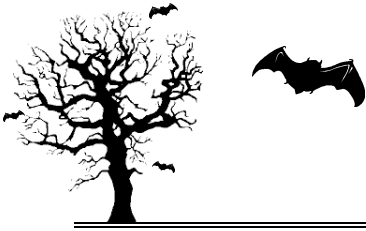
On behalf of our Forum I would like to thank the Assessors in advance for the time they take to consider all three Neighbourhood Plans, all having been the product of a huge sustained effort by communities across Torbay.

Yours sincerely

Cllr Jackie Stockman

Chairman,

Brixham Peninsula Neighbourhood Plan Forum



Greena Ecological Consultancy

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Geoff Melborne
Brixham neighbourhood Plan Forum

5th November 2017

Dear Sirs,

I'm writing to inform you about the results of the long term bat activity monitoring of the land at Waterside Quarry, Paignton.

Greena Ecological Consultancy was commissioned by the Brixham Peninsula Neighbourhood Forum in relation to the Forum's intention to identify a series of housing sites for development to ensure that anticipated future development of these sites by others either individually or cumulatively would not impact on the local Special Area of Conservation and Greater Horseshoe Bats. The land at Waterside Quarry was one of the several selected sites subject to the ecological assessment. The results of all findings on the selected sites are included in previous reports (Rush, Billington, 2016 and Rush, Billington, 2017).

Surveys in relation to bats and other protected species began at Waterside Quarry in autumn 2015. Repeated Batcorder surveys continued in April, May, June, July, August and September 2017 and covered the first few days of October 2017 as well, aiming to establish how, if at all, is the site used by Greater and Lesser horseshoe bats throughout the season. No Horseshoe bat activity was recorded during the monthly placements of two recording devices.

While the detailed results of the monitoring between April and June 2017 inclusive are presented in the Addendum Ecological Survey Report dated July 2017, this letter is to summarize the results of the monitoring between July and October 2017.

The monitoring took place between the following dates: 14th – 21st July, 18th – 25th August, 25th - 30th September and 1st – 5th October 2017.

The results are tabularised below; please note that only those days when bat activity had been recorded are listed. EcoObs Batcorder static monitoring devices were used to gain a picture of bat activity on the Waterside Quarry site. Batcorder 1 was placed monthly at the Ordnance Survey grid reference of SX 89284 58142 and Batcorder 2 at SX 89307 58148. Weather conditions were suitable for bat emergence and foraging during the periods of recording.

Table 1 Results of monitoring of the land at Waterside Quarry, Batcorder 1

date	species	number of passes
15/07/2017	Common pipistrelle	1
	Pipistrelle species	4
	Noctule	1
	unidentified	2
17/07/2017	Common pipistrelle	2
18/07/2017	Pipistrelle species	3
	unidentified	1
18/08/2017	Common pipistrelle	2
	Noctule	1
19/08/2017	Common pipistrelle	5
	Pipistrelle species	3
20/08/2017	Common pipistrelle	1
	unidentified	2
22/08/2017	Pipistrelle species	2
25/09/2017	Common pipistrelle	4
	Pipistrelle species	1
27/09/2017	Common pipistrelle	2
	unidentified	2
28/09/2017	Common pipistrelle	1
29/09/2017	unidentified	1
01/10/2017	Common pipistrelle	2
02/10/2017	Common pipistrelle	2
	Noctule	1
03/10/2017	Common pipistrelle	2

Table 2 Results of monitoring of the land at Waterside Quarry, Batcorder 2

date	species	number of passes
14/07/2017	Common pipistrelle	1
15/07/2017	Common pipistrelle	1
16/07/2017	unidentified	1
18/08/2017	Common pipistrelle	2
19/08/2017	Noctule	1
	Common pipistrelle	2
20/08/2017	Pipistrelle species	1
21/08/2017	Common pipistrelle	1
26/09/2017	Common pipistrelle	2
	Pipistrelle species	2
27/09/2017	Common pipistrelle	1
28/09/2017	unidentified	1
30/09/2017	Pipistrelle species	1
01/10/2017	Common pipistrelle	1
02/10/2017	unidentified	1
04/10/2017	unidentified	1

Due to the fact that no Annex II species were recorded on the site in October 2015 neither throughout the entire bat active season of 2017 it is safe to conclude that the land at Waterside Quarry is suitable as a site to be allocated in the Neighbourhood Plan.

Historic presence of Lesser horseshoe bat was recorded on the neighbouring parcel of land (not part of this proposal) and mitigation measures in form of restricted lighting are recommended to apply for the proposed potential development.

The recommendations of the Bat Conservation Trust (2011) regarding additional external artificial lighting on site are as follows:

- Do not over-light. This is a major cause of obtrusive light and is a waste of energy. Use only the minimum amount of light needed for safety. There are published standards for most lighting tasks, adherence to which will help minimise upward reflected light.
- Eliminate any bare bulbs and any light pointing upwards. The spread of light should be kept near to or below the horizontal.
- Use narrow spectrum bulbs to lower the range of species affected by lighting.
- Use light sources that emit minimal ultra-violet light. Insects are attracted to light sources that emit ultra-violet radiation.

- Reduce light-spill so that light reaches only areas needing illumination. Shielding or cutting light can be achieved through the design of the luminaire or with accessories, such as hoods, cowls, louvers and shields to direct the light.
- Reduce the height of lighting columns. Light at a low level reduces ecological impact. However, higher mounting heights allow lower main beam angles, which can assist in reducing glare.
- For pedestrian lighting, use low level lighting that is directional as possible and below 3 lux at ground level.
- Limit the times that lights are on to provide some dark periods for wildlife.
- Use lighting design computer programs and professional lighting designers to predict where light spill will occur.

Please do not hesitate to contact Greena Ecological Consultancy if you require any further assistance.

Yours sincerely,

Tereza M. Rush