

neighbourhood plans

From: Nick Griggs [REDACTED]
Sent: 28 November 2017 15:36
To: neighbourhood plans
Cc: Karen Griggs
Subject: Brixham Peninsular Neighbourhood plan
Attachments: Neighbourhood plan Tourism 27.11.2017.docx; Site Location Plan.pdf; 01 Site Layout - 03.02.2015.pdf; Design and access statement.pdf

For the attention of the Independent Examiner

Dear Sir / Madam

As local land owners in Brixham we have been invited by Torbay Council to comment and send in our representations for the re-designation & allocation of our land to be considered for the future of The Berry Head Peninsular Brixham's Neighbourhood Plan that will shape our town beyond 2030!

I have attached four files for your consideration

- 1: Neighborhood Plan Tourism 2017 representations
- 2: Site location plan
- 3: Site layout for proposed Tourism resort (for example only)
- 4: Design and access statement (for example only)

As the land owners we would also like to be notified in the event of an Examination Hearing being scheduled.

Mr & Mrs Nicholas & Karen Griggs
[REDACTED]
[REDACTED]
[REDACTED]

contact: '
[REDACTED]
[REDACTED]

Many Thanks for your time

Mr & Mrs Griggs

Sent from Yahoo Mail. [Get the app](#)

Dear Sir / Madam

As local land owners we have been invited by Torbay Council to comment and send in our representations for the re-designation & allocation of our land to be considered for the future of The Berry Head Peninsular, Brixham Neighbourhood Plan that will shape our town beyond 2030!

We would like to put forward our proposals for the land DN325402 'Formally known as the MOD refuelling Bunker, Wall Park Rd Berry Head Brixham ' that would see a successful application, re-designate this land for Tourism Use!

I would like the Independent examiner that will be reviewing the content of the 2010-2030 Brixham's Berry Head Peninsular Neighbourhood plan to consider the following representations for the change of designation of the Land previously known as the 'MOD Refuelling Bunker' situated on private land off Wall Park Road, Berry Head Brixham, DN325402.

For locating this property Please see the attached site location plan and refer to Berry Head Peninsular Neighbourhood plan Site Map:1: Berry Head

Historically a Brown field site dating back to the mid 1930's This site was in use and developed as a re-fuelling depot which was built for the purpose of servicing WW2 HM Forces and Merchant shipping by the means of an underground pipe line that led from the land, situated off Wall Park Road Brixham and terminating on the end of the Brixham Breakwater for the purpose of refuelling ships.

After the war the Mod fuelling depot was reverted back to the Civilian sector and was leased from the MOD by 'Esso Fuels' until it was de-commissioned in the late 70's / early 80's when the fuel tanks were removed and the land was sold by the MOD into private ownership with a covenant attached for the period of 15 years that would allow for further payments to be made to the MOD if and when the site was re-developed for housing or business use!

We acquired this 13 acre site in 2001 and have been the sole owners ever since. However In spite of this lands historically pre-developed Brownfield status, it has now been re-designated as an ANOB as it flanks Berry Head Country Park, but this property is also flanked by two of the remaining Holiday parks (that also sit within the ANOB of The Berry Head Peninsular) The first being Landscope Holiday Camp & Caravan park to the South and the 2nd being Wall Park Holiday Centre incorporating a mini golf course and a new Touring holiday park & Lodge development ,that lies to the west and is accessed from Gillard road & Century Road, so the land in question (DN325402) is ideally situated next to Berry Heads current holiday parks, coastal walks & headland attractions, So would be an ideal site to be re-designated and allocated for an upmarket 5 Star Eco Tourism Accommodation as it already has approved access from the Torbay Highways department for such a purpose & is serviced by a private metalled road from Wall Park Road to the North plus a second access from the metalled road known as Berry Head lane that links Berry Head Road situated to the North, To Gillard road situated on the Southern boundary of our property. Berry Head lane also separates this former MOD land from the SSI of Berry Head Country Park.

The land in question is currently overgrown with brambles and dense scrub and has no useful purpose to neither man or beast and nestles in a low lying dip within a natural valley that means any visual impact from an Eco Holiday Resort development would be minimal as the properties boundary is also shielded by a tall, thick & dense natural hedge row on all sides of its boundaries that would hide any low lying & environmentally friendly 'Green roofed Eco Holiday Development' from view of the SSI of Berry Head Country Park, or the surrounding area. Should the land be allocated for Tourism it would also generate the much needed income required to manage the southern part of this site that would be designated as a receptor area for the proposed development site situated to the north and managed as a nature reserve that would attract further wild life by creating fresh water ponds & suitable habitats that would encourage foraging and breeding by further species that are currently unable to set up home on this site due to the dense undergrowth that covers the majority of this property as it stands!

Any tourism development would of course have to be in line and subject to the current planning policies in force for the ANOB and Berry Head Peninsula and would also have to prove that the proposed development would not have a detrimental impact on any wild life using the site that would be supported by further 'robust ecology representations' to accompany a full suite of environmental surveys and an (EIA) Environmental Impact Assessment, that have already been carried out and prepared for the planning application P/2015/1092 for a 5 Star Eco Tourism Resort for which our proposals have already been considered by Torbay Councils Planning department who have already stated that, 'in principle' they have 'No Objections' to the former Mod site being re-developed as a high end 5 Star Eco Tourism Resort on the understanding that the application can show a need for such a resort and any application for the resorts development would not be to the detriment of the ANOB, SSI of Berry Head Country Park, or the wild life that resides and forages on the Berry Head Peninsular!

Our planning application for this project was submitted to Torbay Planning Department in early 2016 and was withdrawn due to the planning offices requirement of further robust, time sensitive Eco & Wildlife Surveys that would be needed to support the application and only then would the planning office be able to make its final decision on whether to approve or refuse this application.

I have enclosed High Lighted excerpts from the proposed Neighbourhood plan that support's the urgent need for 'High End' Top Quality Holiday Accommodation that would give Brixham The Real Tourism Boost it needs so Brixham Town can put itself on the map as a Top Quality Holiday Destination in the South West for the 21st Century.

At present there is a very limited provision for top end holiday accommodation that would attract 'high earning' visitors to spend more than a day at a time in Brixham Town and we need to attract more of the 'ABC1 long stay visitors' that have a considerably larger spend per person, per day and a much larger disposable income than the town has traditionally experienced from past and current holiday makers that have stayed at the low budget Holiday Camp style accommodation on offer in Brixham that has also been diminishing at an alarming rate over the past 4 decades as many of the Holiday camps in Brixham that traditionally attracted 1000's of visitors over the past years have now been sold out to housing developers instead of being updated to attract a more discerning visitor and up market clientele to area!

Exerts from the Neighbourhood plan that support this application: As Follows

10 Tourism (TO) 10.1 Tourism is one of Brixham's main economic drivers and a major sector of employment across the Peninsula. It has been estimated⁷⁰ that in 2013 there were in Brixham: • 124,500 staying visitor trips spending £32,580,500 • 483,100 day visitors spending £17,255,200 • a £49.8 million direct visitor spend for the year • 942 full-time equivalent jobs supported by visitor-related spending. Of those visitors that stayed in Brixham, 35% stayed in static vans/holiday centre type accommodation and 27% stayed with friends or relatives. 10.2 In 2014, English Riviera Tourism Company (ERTC) statistics show that across Torbay the average spend per night for a staying UK visitor was £68.47. For a visitor from overseas to Brixham, this was £72.83, but the number of nights stay per trip has been declining since 2010. 10.3 Whilst the number of day visitors to the Bay has increased by a huge 36% since 2010, their average spend per trip in 2014 was only £36.04, which is almost a 25% reduction from the 2010 spending figure of £47.64 per visitor. Whilst choosing dates to compare can be subjective, these figures do highlight the recent downward trend. 10.4 Four key needs to improve Brixham's tourist offer have been identified:⁷¹ • the need for better marketing • the need for higher quality accommodation ⁷⁰The English Riviera Tourism Company, Brixham 2013 Report. ⁷¹Torbay Development Agency, The Turning the Tide for Tourism Strategy, 2010–2015. Submission Document August 2017 | 83 Brixham Peninsula Neighbourhood Plan • the need for higher quality food outlets • the need for more indoor and outdoor leisure facilities. 10.5 During the compilation of the Neighbourhood Plan and the consultations undertaken, many thoughts and ideas have been expressed about what needs to/could be done to stem and reverse the downturn in spending by visitors and increase the numbers of tourists to Torbay, particularly those who stay in our Peninsula. 10.6 What is clear is that this industry is critical to the whole economy of the Brixham Peninsula and as such needs special consideration when considering the future use of available land. Without protection of a sustainable economy our community, our heritage, our environment and our whole way of life are at risk. 10.7 Accommodation supply has diminished significantly in recent years. The closure of Pontin's Dolphin Holiday Camp following a fire in 1991 and its redevelopment into Sharkham Village, the current change of Wall Park Holiday Village into a housing estate, development of "The Cove" from holiday camp to investment homes and many changes of use from bed and breakfast businesses to residential dwellings all represent a huge loss of available beds for visitors. 10.8 This trend needs to be reversed if our tourist industry is to survive. It is recognised that the type, quality and culture of tourism is changing but we need to respond to such change with investment in the kind of holiday experience and facilities required for the 21st century. It is not acceptable to see all our tourist accommodation disappear either from lack of investment in the industry or demand for land to meet the pressure for housing development. We risk a tragedy for our whole economy if we fail to improve and increase our tourist accommodation, especially at a time when the domestic holiday industry is showing an upturn across the UK. 84 | Submission Document August 2017 Document 1 of 10 Policy TO1: Support for of tourism TO1.1 Subject to compliance with the other policies of this Neighbourhood Plan, developments that increase the quality and range of tourist accommodation and leisure potential in the Peninsula area will be supported, especially where it can be demonstrated that the development will lead to the creation of local jobs. TO1.2 Redevelopment for non-tourism use of any significant "holiday camp" or self-catering tourism accommodation site within the Brixham Peninsula will not be supported. Significant in this context means any site providing more than 10 units of all or any of caravan, lodge, chalet, apartment or similar short-term visitor accommodation. TO1.3 Where there is no reasonable prospect of a tourist facility or amenity being redeveloped explicitly for tourism purposes change of use will be supported subject to the following criteria: • the alternative use will also support local

tourism, including self catering accommodation; or • the alternative use will otherwise support the local economy by providing employment; or • the alternative use will contribute to the needs of the community by providing affordable, disabled or older person housing in accordance with Policy BH9 or by providing housing for principal residence housing. Justification for Policy TO1 10.9 Over recent years the number of tourist beds in the Peninsula area has declined greatly and as tourism remains a key employment area and driver of the local economy, this decline needs to be reversed with better quality and year-round availability along with further all-weather leisure facilities. In line with the Local Submission Document August 2017 | 85 Brixham Peninsula Neighbourhood Plan Plan,72 this policy seeks to tighten previous planning policy that has resulted in the loss of so much tourist accommodation or amenity in recent years. From community consultation events, concern has repeatedly been expressed that the lack of land availability for tourism will make it impossible for the industry to respond positively to any economic upturn or change in pattern of holidaymaking behaviour. Economic regeneration is dependent on scope for expansion of our tourist industry.

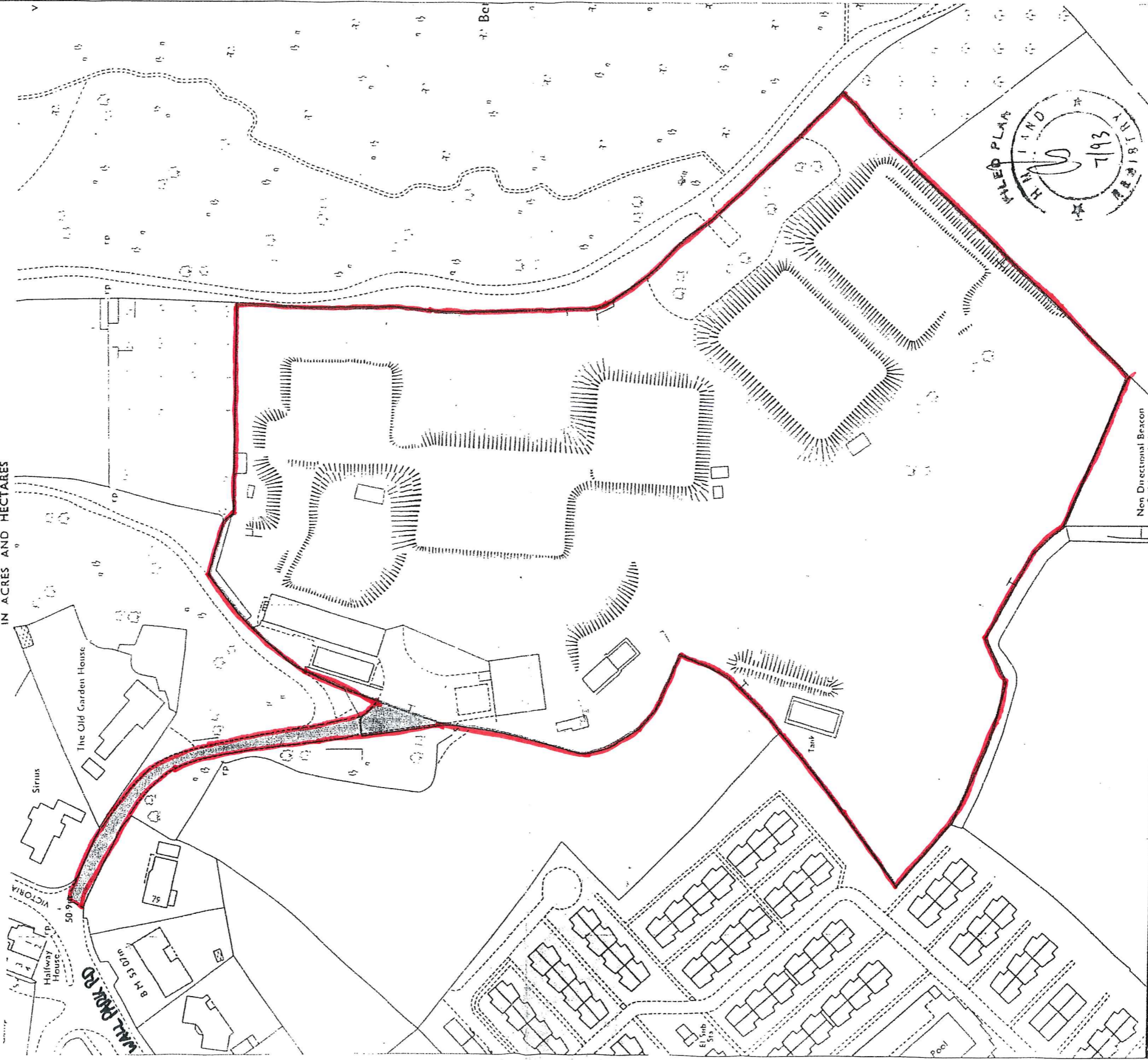
10.10 In addition to this key policy, all consultation has indicated a virtually unanimous view that to regenerate our tourist economy, many projects and practical ideas need to be strongly promoted and supported by the whole community as well as Torbay Council and the ERTC. Evidence gathered from our community consultations, often provided by those employed in the tourist industry, demonstrated a strong need to use planning policy wherever possible, to support and enhance an industry that, whilst vulnerable to market changes and holiday trends, still plays a crucial role, if not the predominant one, in the economic fortunes of our whole Peninsula. 10.11 Brixham lacks the stock of larger housing enjoyed by the rest of Torbay which provides bed spaces in key tourism zones and so needs to protect as far as it can its scarce accommodation resource and take every opportunity to both increase and improve the quality of it. 10.12 Tourists come to Brixham not for a single attraction but because the town itself is the attraction. When visitors were shown images of Brixham, they found its characteristics appealing. Therefore, there is a need to keep the quaint feel of the town for tourism, to build upon Brixham's unique identity and heritage aspects and develop a Brixham brand. 10.13 Brixham has been awarded the UK Port of the Year title in 2016 and 2017. It is also placed in the top 10 of the best seaside tourist destinations in the UK and it remains the highest earning port in England. 72Adopted Torbay Local Plan, Policy TO2, "Change of use of tourism accommodation or facilities", 2016. 86 | Submission Document August 2017 Document 1 of 10 10.14 The Peninsula community run many excellent annual events and festivals, from the smaller Gooseberry Pie Fair in Galampton, to larger events such as the Pirate Festival, Fishstock, the Trawler Race, BrixFest, the Hap'nin and the Torbay Steam Fair. Themes vary and cover fish, trawler racing, music, heritage sailing and regattas, the arts, steam and the RNLI. They are all very popular and attract thousands of visitors, local and international, who fill the town's bed and breakfasts every year. 10.15 Marketing of Brixham has been carried out by the Tourism Partnership who rely on volunteers. The ERTC has a regularly updated website for the whole of Torbay, but it is felt that a website just for Brixham is essential. 10.16 Overseas visitors stay longer and spend more per trip than UK visitors, and currently Torbay is receiving a large number of German-speaking visitors. Advice to businesses to include language translation options when modernising their websites would perhaps help them to compete on the international tourism stage.

Please refer to Berry Head Peninsular Neighbourhood plan Site Map:1: Berry Head

H.M. LAND REGISTRY		TITLE NUMBER	
		DN325402	
ORDNANCE SURVEY PLAN REFERENCE	SX9356 SE	Scale	1/1250
COUNTY	DEVON	DISTRICT	TORBAY
		© Crown copyright	

NOTE: AREAS ON THIS PLAN ARE EXPRESSED

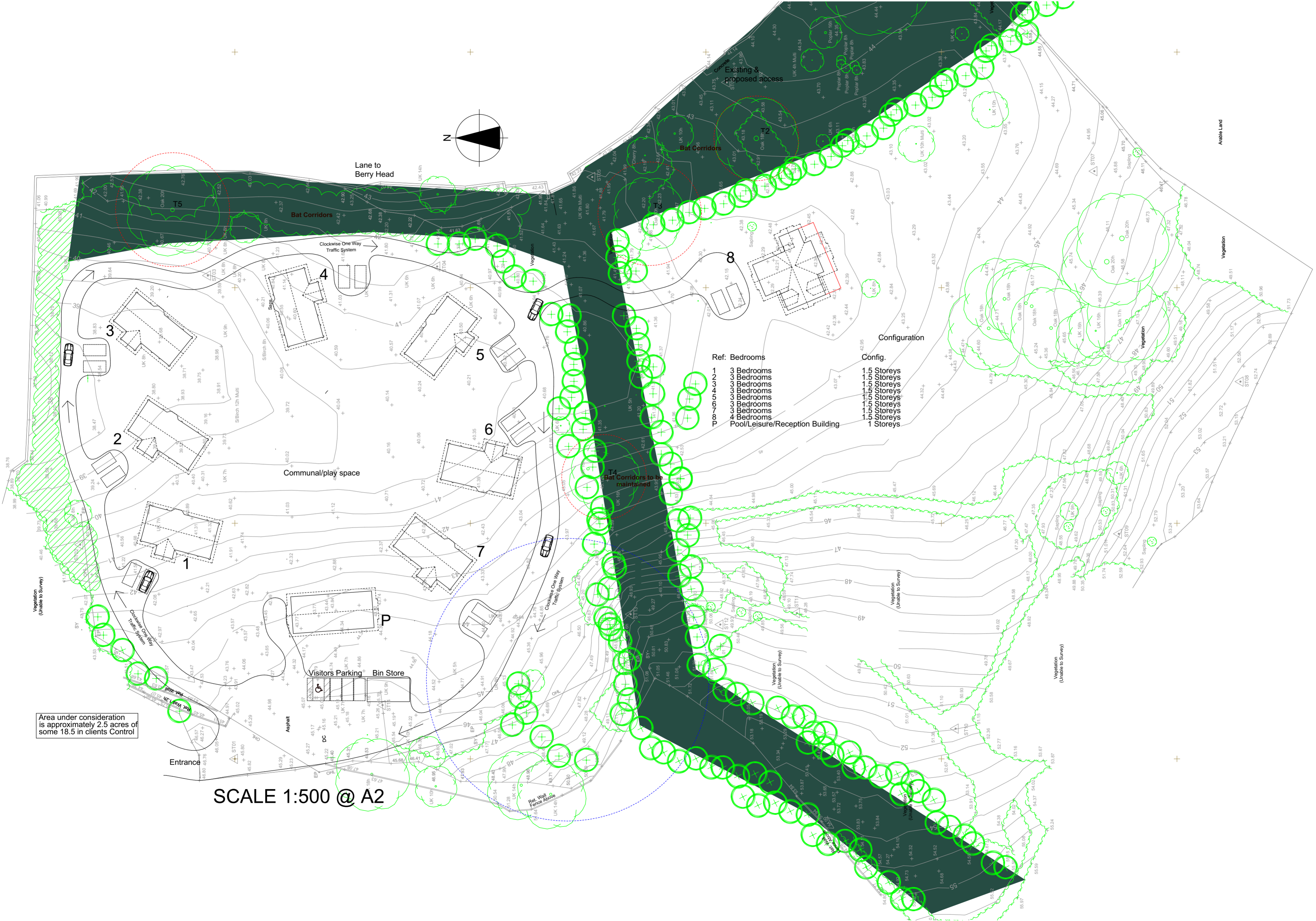
IN ACRES AND HECTARES



This office copy shows the state of the title plan on 4 December 2002 at 13:16:18. It may be subject to minor distortions in scale. Under s.113 of the Land Registration Act 1925, this copy is admissible in evidence to the same extent as the original. Issued on 4 December 2002.

This title is dealt with by the Plymouth District Land Registry.

© Crown copyright. Produced by HMLR. Further reproduction in whole or part is prohibited without the prior written permission of Ordnance Survey. Licence Number GD272728.



Area under consideration is approximately 2.5 acres of some 18.5 in clients Control

SCALE 1:500 @ A2



Design & Access Statement

Erection of 8 holiday eco-lodges

Former MOD Land, Berry Head, Brixham

Mr Nick Griggs

November 2015



1 Introduction

This Statement has been prepared to respond to the general requirements set out in Section 42 of the Planning and Compulsory Purchase Act 2004. The proposal principally relates to siting of 8 timber holiday eco-lodges at the former MOD site, Brixham Devon.

2 The Process

In preparing this Statement, account has been taken to the advice and guidance set out in *DCLG Circular 01/2006, Guidance on the Changes to the Development Control System (June 2006)* and CABE's document *Design and Access statements, How to write, read and use them (2006)*.

2.1 Assessment

Physical

This former MOD site totals some 3.5 hectares (8.7 acres) in area, however only 1.5 hectares (3.7 acres) forms part of the application site. The remaining, southern, larger part of the site will be managed in accordance with the recommendations of an appointed Ecological Consultant to maximise the wildlife habitat and landscape value of the land.

There are two existing vehicular accesses to the site from Victoria Road/Wall Park Road to the west boundary of the site and Berry Head Road to the east boundary of the site.

The submitted location plan and Ordnance Survey maps show a number of buildings were previously located on this site. All structures have been removed however a number of hardstandings and building bases remain on the site.

In determining the effect upon an AONB, consideration must be given to the existing uses and landscapes within it that make up its character. The Wall Park and Landscope holiday villages were located in the area, prior to the designation of the AONB and therefore form an intrinsic part of the character and distinctiveness of the AONB. Holiday use has therefore been accepted in the area for many years, before and after the AONB designation.



As described in the submitted Landscape & Visual Appraisal, it is rare to find such a well screened, hidden and discreet site, with little potential to effect local amenity, providing an opportunity to enhance its landscape for the benefit of the locality. The natural beauty of the AONB will therefore be enhanced as a result of the proposal.

No mitigation measures are required to successfully assimilate the development within the landscape. Only remedial works will be required to redress any minor disruption caused by the construction phase of the development.

Social

The proposed eco-lodges will be more than 60m from the nearest residential property and located in a dip within the topography. The site will be accessed via Victoria Road/Wall Park Road with proposed improvements to provide pavements on the access drive for the benefit of pedestrian users. As a tourism use the development performs a key social function.

Economic

The applicant has identified a shortfall in the form of high quality holiday accommodation proposed. During pre-application consultations, a number of organisations expressed their support for the proposal in recognition of the economic benefits that the proposal will bring to the area.

The Good Practice Guide on Planning for Tourism (replacement for PPG21) highlights the economic benefits of tourism proposals to the local area. It states for example "Tourism is of crucial importance to this country. It generates significant revenues, provides millions of jobs, supports communities and helps maintain and improve important national assets... It contributes £74 billion to GDP".

Planning Policy

Planning Statement has been submitted in support of this application that should be read in conjunction with this Design and Access Statement. In summary however, the principle of the development in a 'Countryside Zone' accords with Policy L4 that supports tourist facility proposals in such locations. The NPPF is supportive of tourism and economic development proposals in locations such as this that abut the defined settlement boundary. Given the Social and Economic roles of the development there is a presumption in favour of this sustainable development within the context of the NPPF.





With the careful landscape management of the site and the remainder of this former MOD site, outside of the application site, the beauty of the AONB can actually be improved. The latter specifically accords with the requirements of AONB Policy L1.

Policy L1 also requires that development will only be permitted in the AONB where it would support the conservation and enhancement of their natural beauty or would foster their social and economic well-being. This development provides a unique opportunity to achieve both of the latter requirements.

Furthermore, as a brownfield site, the proposal will not require the development of land that has not already been previously developed upon.

A Phase 1 Habitat survey and separate surveys for Bats, Reptiles and Cirl Buntings demonstrate that these species and the resident badgers will not be harmed by the development proposal. The proposal is therefore considered to accord with Policy NC3 – Locally Protected (Wildlife) Sites.

Considering the above, the proposed development is considered to improve the physical, social and economic context of the area.

2.2 Use

It is widely known that this site was previously developed with a number of MOD buildings. Indeed these buildings are shown on the submitted location plan. Since there has been no intervening use of the land the current status of the site is that of a previously developed or brownfield site.

The sustainable, eco-tourism proposal is considered to provide high quality self-catering, holiday eco-lodges that will significantly contribute to the economy of the area in accordance with a number of planning policies, including those relating to the AONB, tourism and wildlife.

Submitted in support of the proposal is a summary of the proposed management of the site. All of the eco-lodges will be occupied on a short term holiday basis and are not intended to form second homes. The applicant intends to sell 4 of the proposed eco-lodges to a holiday investment company to fund the development proposal. These sold units would remain within the overall management of the site, on a short term letting holiday basis, in the same way as those eco-lodges retained by the applicant. The applicant is willing to accept conditions requiring short term holiday let only and is willing to enter into a legal agreement with Torbay Council should this be considered necessary.





2.3 Amount

The full accommodation schedule is as follows:-

Chalet Number	Number of Bedrooms	Number of stories
1	3	1.5
2	3	1.5
3	3	1.5
4	3	1.5
5	3	1.5
6	3	1.5
7	3	1.5
8	4	1.5
Pool and Reception building	0	1

Chalet 8 will provide accommodation for the applicant to manage the site and includes ancillary accommodation for his elderly parents.

A single storey facilities building measuring approximately 8m by 17m will provide a swimming pool, other leisure uses and the main reception area for visitors to the site. An existing hardstanding area would be used as visitor and reception parking.

2.5 Layout

The proposal seeks to provide 8 high quality timber holiday eco-lodges to the northern 1.5 hectare part of the site. The eco-lodges will be arranged around a circular internal track with recreational play space in the centre of the site.

The facilities building is proposed near the entrance to the site where visitor parking is provided on an existing hardstanding.



2.6 Scale

The storey heights are given in the accommodation table above. All of the eco-lodges have been reduced to 1 ½ storey with first floor accommodation in the roof space. The pool/reception building is single storey.

2.7 Landscaping

Whilst the development itself will have a neutral effect on the landscape, the Landscape & Visual Appraisal describes opportunities to enhance the value of existing vegetation and trees through appropriate arboricultural work. Structure planting to the north boundary of the site is proposed as well as a significant level of individual tree planting throughout the site. As described above, these works are not required to mitigate for the proposed development but provide an opportunity to improve the existing landscape value of the site. Living green views will also help assimilate the development within the landscape.

2.8 Appearance

Rather than just the design of the proposal, the amalgamation of the use, amount, layout, scale and landscaping will lead to the overall appearance of the development.

In detail the eco-lodges will be constructed using a timber panel wall system with extremely efficient insulating. Together with the proposed triple glazed windows the heating requirements of the eco-lodges will be minimal, even in winter.

A number of other sustainable measures will be incorporated including rainwater harvesting and grey water recycling, solar panels, low energy lighting and appliances and living green roofs. Not only will the green roofs further reduce the visual impact of the development from within the site, but they also retain rainwater reducing surface water runoff.

As described in the submitted Landscape & Visual Appraisal, it is rare to find such a well screened, hidden and discreet site, with little potential to effect local amenity, providing an opportunity to enhance its landscape for the benefit of the locality. The natural beauty of the AONB will therefore be enhanced as a result of the proposal.

No mitigation measures are required to successfully assimilate the development within the landscape. Only remedial works will be required to redress any minor disruption caused by the construction phase of the development.



Given the above, there will be little change to the appearance of the area as the eco-lodges will not easily be seen from surrounding views. Living green roofs will additionally help the development blend with the locality.

2.9 Eco-Credentials

This is not a traditional building development of bricks and mortar. Brixham is currently unable to offer tourists this unique kind of 'Green' holiday accommodation, in fact this development will be a first of its kind anywhere in the southwest of England and this fact alone will only help draw holiday makers into our town, not just for the traditional 12 weeks a year but all year around, bringing with it extended prosperity to Torbay.

Many visitors to Torbay's 'National Geo Park' would also welcome the opportunity to stay in luxury 5* accommodation adjacent to the nature reserve and site of special scientific interest of Berry Head Country Park. Our unique eco accommodation & facilities could very well encourage visitors to stay in Brixham rather than just come for the day then leave.

The proposed eco-chalets would be 90% free of traditional building materials as follows:

- No Tarmac Roads
- No Pavements
- No Plastic Windows, Gutters or Fascias
- No Street lamps or light pollution
- No Visible concrete

Just Natural Materials and 21st Century Technology is proposed as follows:

- Logs for the walls
- Living turf on the roofs
- Cinder on the tracks
- Solar powered energy source
- Ground Core Heat Pumps

All these very green features are designed to appeal to a specific eco tourism market that Torbay and Brixham has yet been unable to attract or cater for. In detail, the following sustainable initiatives are proposed:

- Construction is of 360mm full round pine logs from a sustainable source forested in Scandinavia.
- Passive Solar Heating using Argon Filled double glazed hard wood window and door units.



- Ground core Heat Pumps that achieve free heating & Hot water all year around.
- Natural living turf roofs that achieve superior levels of insulation and eliminate heat loss through the roof.
- Grey/rain water harvesting to run toilets, baths & showers on re-cycled water.
- PV Cells & Solar panels to supplement power for hot water & electrical usage.
- The combination of all the above eco features within these luxury lodges will reduce the Eco Holiday Villages carbon footprint to an absolute minimum.

3 Access

The revised proposals, for a reduced number of holiday eco-lodges, propose access to be served via Victoria Road/Wall Park Road to the west boundary of the site where there is currently vehicular access. During pre-application discussions the Highway Authority confirmed that the revised access proposal to serve the development via the existing Victoria Road/Wall Park Road access is appropriate and alleviates their concerns regarding the previous application that sought access via Berry Head Road. A copy of these e-mail exchanges are appended to this Design & Access Statement.

In addition the following improvements have been recommended by the Highway Authority and incorporated as part of the development:

- Cut back vegetation on access drive to allow sufficient width for two vehicles to pass
- White lining of the access drive junction where it meets Victoria Road/Wall Park Road
- Provision of a pavement along the access road to link to the existing footway network
- 5 mph signage along the access road

The holiday eco-lodges will be constructed in accordance with the relevant requirements of Part M of the Building Regulations in respect of the Disabled Discrimination Act requirements.