

neighbourhood plans

From: Cherry Hosking [REDACTED]
Sent: 12 December 2017 15:21
To: neighbourhood plans
Cc: Mum
Subject: Brixham Peninsula Neighbourhood Plan – representation from WJE & J Hosking
Attachments: Response to Brixham Neighbourhood Plan Consultation - 2017_12 - from W E....pdf

Dear Sir/Madam

I have pleasure in attaching my parents' response to the above consultation on the Brixham Neighbourhood Plan.

Please would you confirm receipt of this e-mail and its attachment.

Your faithfully

Cherry Hosking

Summary

We have an interest in two sites in the proposed plan that have both been considered for housing provision and either rejected or partially rejected. This response sets out the arguments why these rejections should be reviewed and why both sites should be included in the plan, providing the potential for an additional 60 houses in Brixham.

St Mary's Industrial Estate/Old Dairy

Whilst part of the Industrial Estate has been included in the plan, the inclusion of the adjacent field, giving the potential for at least another 12 dwellings, was rejected with no reasons being given other than it was noted that it lay within the AONB and that a "former building ... has largely blended into the landscape". The AECOM site appraisal suggests the field is an undeveloped greenfield site and benefits from the presence of mature trees.

The field is adjacent on its four sides to: housing; a well-travelled road with housing on its opposite side; a campsite; and the Industrial Estate. As such it is an isolated, relatively small part of the AONB situated on its westernmost edge.

The building is of a significant size and stands prominently in a corner of the site. It is used regularly for the storage.

Given the factors described above, we believe there is no substantial reason for the field to be excluded from the plan and that it should be included along with the Industrial Estate and Old Dairy.

Upton Manor Farm Campsite

The site has been rejected because it is deemed to fail the criteria of Suitability and Achievability: that is, using the definitions given in the plan¹ that there are insurmountable physical or environmental factors and the development is unlikely to be economically viable and there is not a reasonable prospect it will go ahead.

Considering the physical and environmental reasons given that resulted in this assessment:

- **Enclosure within the AONB** – the site is on the edge of the AONB and isolated from the rest of the area by a well-travelled roadway. The link to the rest of the AONB beyond the roadway is a field that has a licence to be used as a temporary campsite. The draft neighbourhood plan notes earlier comments that the camp field "could be considered as slightly separated from the main AONB rolling landscape". This separation has become more pronounced since that comment was first made as a result of the development of the neighbouring caravan site and Sharkham Village. The campsite and its adjacent fields are totally encircled by buildings with the only break in this boundary being St Mary's Road.

¹ paraphrasing from paragraph 3.0.8 of the Housing Site Assessment:

- Suitable – there are no insurmountable physical or environmental factors
- Available – evidence the landowner is willing for the development to go ahead.
- Achievable - development is economically viable and a reasonable prospect the development will go ahead



Development on the site would be largely invisible from the town of Brixham, located as it is above the main town in a similar situation to the recently developed Sharkham Village. These are substantial reasons for considering the campsite's detached position within the AONB not to be a factor preventing the site's inclusion in the plan. Rather, it would be a factor to be considered in any subsequent planning application.

- **Impact on Greater Horseshoe Bat (GHB) population** – the edge of the campsite adjacent to the road is a flyway for GHBs and, sensitive to this, we commissioned a survey of the bat population. This did not identify any insurmountable issues with the development of the site but noted mitigation that would be needed to limit the impact of any future development. The major development at the adjacent Sharkham Village was allowed to progress despite similar risks to the same GHB population. Given that this development is now largely complete, the GHB population has not been impacted, due to the implementation of mitigation measures. There is no reason that the mitigations that allowed this development to proceed could not be used in any development of the site in question. The impact on the GHB population is not an insurmountable environmental factor and the actions to address the issue can be considered by the planning authority at the time a proposal is put to them as it has been for other developments in the area.
- **Access to the site** – the site, along with adjacent housing, caravan sites and industrial buildings, is served by narrow and twisting roads. This presents difficulties for local buses, council refuse collection and emergency services in accessing property near the site. The current owners have made it very clear to the Neighbourhood Forum that they are more than willing for any development of the site to include improvements to the existing road which would benefit the housing and holiday accommodation it serves as well as access to local residents visiting St Mary's Bay and Sharkham Point. Access is not an insurmountable physical factor that should prevent the inclusion of the site in the plan. Rather it is an opportunity at the Planning stage of any development for the planning authority to gain benefit for the community as a whole.
- **Loss of campsite accommodation** – Previous planning applications for development of the site, to give it greater appeal to a broader range of camping styles, have been rejected and

yet the plan considers the site an “important facility for the ... visitor economy”. The current owners have noted in previous submissions to the Neighbourhood Forum the decline in demand for camping accommodation such as provided by the site. Whether the site is developed for housing or not, it is likely that it will cease to be a viable business within the lifetime of the proposed plan.

- **Proximity to a listed building** - The AECOM assessment and previous drafts of the proposed plan both repeat a factual error about the site’s proximity to a listed building. The website <https://www.britishlistedbuildings.co.uk> correctly lists Norton House, Milton Street, Higher Brixham as being a Grade II listed building. Unfortunately it then makes the mistake of providing mapping information relevant to Nurton House, Castor Road, which is adjacent to the campsite but which is not a listed building. Norton House, the listed building, is more than a kilometre from the campsite.

As none of these factors is insurmountable the Suitability test is not failed. Whether the Achievability test is failed depends on economics. The successful development of other sites (especially Sharkham Village) in the area that had similar physical and environmental issues which were mitigated for at the planning stage indicates the failure on economic grounds is also an incorrect assessment.

As the Suitability nor the Achievability Tests have been proven to be failed and the Availability Test has been passed the site should be included within the Brixham Neighbourhood Plan.

WJE & J Hosking
December 12th, 2017