

neighbourhood plans

From: keith.fenwick [REDACTED]
Sent: 11 December 2017 17:17
To: neighbourhood plans
Cc: janet.rowley
Subject: Brixham Peninsula
Attachments: 11053_Site Plan Overview_revised 171206_A1.pdf; 171211 - Brixham NP - Landscope Reprs FINAL.docx

Dear Sirs,

Please find attached representations made on behalf of Park Holidays regarding the above plan.

Regards

Keith Fenwick
Director

WYG

54 Hagley Road, Edgbaston, Birmingham, B16 8PE

Tel: [REDACTED]

Mob: [REDACTED]

www.wyg.com

WYG Environment Planning Transport Limited. Registered in England number: 3050297.
Registered Office: Arndale Court, Otley Road, Headingley, Leeds, West Yorkshire LS6 2UJ. VAT No: 473-2380-49.





Our Ref:

Your Ref:

11th December 2017

Torbay Council
Neighbourhood Plans
Spatial Planning
Electric House
Castle Circus
Torquay
TQ1 3DR

Dear Sirs

DRAFT BRIXHAM PENINSULA NEIGHBOURHOOD PLAN

SUBMISSION PLAN CONSULTATION, NOVEMBER / DECEMBER 2017

WYG has been instructed by Landscope Holidays Ltd to advise regarding the emerging Brixham Peninsula Neighbourhood Plan.

Our Client operates two holiday parks within the Draft Neighbourhood Plan Area: the Landscope Holiday Park on Gillard Road and the Riviera Bay Holiday Park on Mudstone Lane. Both are well-established holiday parks that make a valuable contribution locally to local tourist accommodation and employment.

Draft Policy E4 - Proposed Local Green Space Designation

Our Client made representations to the Regulation 14 consultation in March 2017, in response to the proposal to include their land at Landscope Holiday Park as part of a Local Green Space (LGS) designation at Berry Head.

The submission objected to the grounds on which the planned designation had been proposed, and noted that it did not meet any of the basic conditions set out at Para 77 of the National Planning Policy Framework. Specifically:

1. The Holiday Park is separated from and does not form part of the Berry Head Nature Reserve.
2. It had not been shown that the area holds a particular significance for the local community.
In particular:
 - The area has been part of the Landscope Holiday Park for many years. The Landscope Holiday Camp to the south of Gillard Road was established between 1907 and 1933 and had been extended over time to comprise the present day accommodation and buildings.
 - The site does not have any historical significance that would warrant its protection in the manner proposed.
 - Although it is part of a wider landscape setting, as an operational holiday park the site in itself cannot be said to offer any sense of intrinsic beauty or tranquillity.





- The holiday park is private land and although there are a number of footpaths in the local area, none of these have Public Right of Way status and none of the footpaths pass through the site. As such, the Park does not have any recreational value for the local community.
 - Ecological work undertaken in connection with the site's redevelopment has shown that any wildlife value derives from the habitat being suitable for breeding birds, reptiles and foraging and commuting bats. The ecological impacts of development have been appropriately managed through existing ecology designations and associated policies.
3. The Neighbourhood Plan does not confirm the area of the proposed Local Green Space designation, but this would seem to be in the order of 66 hectares. This clearly represents an extensive tract of land, and is therefore not consistent with Paragraph 77 bullet point 3.

In Consultation Statement that accompanies the Submission Neighbourhood Plan, the Town Council accepts that the Landscope Holiday Park should be removed from the proposed LGS area. This approach is reflected in the updated Neighbourhood Plan, although the relevant Policy Map only removes the area 'believed' to be the Holiday Park. This is based on an outdated plan and does not reflect the expanded development area at the site, as approved in Planning Permission Reference 2009/0452/PA, which granted permission for extensive improvements at the Holiday Park and an expansion of the built footprint.

Notwithstanding the comments above on whether the remaining area of Local Green Space proposed can satisfy the relevant NPPF tests, to assist the Town Council in this matter I am pleased to enclose a Plan (Reference 11053 BSL ZZ XX DR A 2001 PL) showing the built extent of the Landscope Holiday Park. I would request that this be forwarded to the Independent Examiner so that it can be reflected in the final Policy Maps.

I would be grateful if you would acknowledge receipt of these comments in the first instance, and confirm that they have been duly made and received prior to the 18th December 2017.

Yours faithfully

[Redacted signature area]

Keith Fenwick
Director
For and on behalf of WYG

Encs.

