

## neighbourhood plans

---

**From:** Palmer, Paul  
**Sent:** 18 December 2017 08:39  
**To:** neighbourhood plans  
**Subject:** TDA Response - Neighbourhood Plans  
**Attachments:** Brixham - Green Spaces in the Neighbourhood Plans.pdf; Paignton - Green Spaces in the Neighbourhood Plans.pdf; Torquay - Green Spaces in the Neighbourhood Plans.pdf; Torquay Neighbourhood Plan - Local Green Space Designations (TDA Comments Dec 2017).pdf; Paignton Neighbourhood Plan - TDA comments Dec 2017.pdf; Brixham Pensisula Neighbourhood Plan - TDA Amendments Dec 2017.pdf

Dear Neighbourhood Planning Team

Please find attached on behalf of Torbay Council, TDA's response to the Neighbourhood Plans Local Green Space Designations.

There are two documents for each Neighbourhood Plan a Schedule and Commentary.

Kind Regards

**Paul Palmer MRICS (Registered Valuer)**

**Estates Manager**

TDA  
Tor Hill House  
Union Street  
Torquay  
TQ2 5QW  
**Tel:** 01803 207920  
**Fax:** 01803 207511



This email and any attachments are intended solely for the use of the intended recipient(s) and may contain confidential information and/or may be legally privileged. If you have received this email in error, please notify the sender immediately and delete this email.

TDA is a trading name of Torbay Economic Development Company Limited, a company registered in England and Wales No. 7604855 Registered Office Tor Hill House, Union Street, Torquay, Devon TQ2 5QW

## **Response to the designation of Green Spaces in the Neighbourhood Plans**

### **TDA on behalf of Torbay Council (acting as a landowner) – 15<sup>th</sup> December 2017**

#### **Paignton Neighbourhood Plan**

As a summary the Council, in its capacity as a landowner, issued its first representation on the Paignton Neighbourhood Plan, via the TDA, on the 31st May 2017. Objections were made to more sites than was the case with the Brixham Neighbourhood Plan. As with the Brixham Neighbourhood Plan the Council did not object to designations where land had an established recreation use such as allotments / memorial gardens etc. The Council did, through the TDA, object to the green space designation where some development potential existed. Since this time the Council, through the TDA, has issued a representation on the Torquay Neighbourhood Plan and this representation was of a more overarching principle.

As a consequence the Paignton Neighbourhood Plan Local Green Space Designation has been revisited. Therefore, the TDA's view on behalf of Torbay Council is as follows;

To create a more uniformed position across each Neighbourhood Plan, Torbay Council, through its agent, the TDA, recognises that the National Planning Policy Framework does set out the opportunity for Neighbourhood Plans to identify Local Green Spaces. TDA agrees that local communities through local and neighbourhood plans should be able to identify for consideration green areas of particular importance to them for protection. However, it is not always appropriate to simply identify land as Local Green Space. The designation should only be used if, for example, the land in question is demonstrably special and has local significance. When identifying land as Local Green Space it is important to be consistent with the local planning aims of sustainable development and should complement investment in sufficient homes, jobs and other essential services.

It is reasonable for the TDA on behalf of Torbay Council to continue to object to any designation where it is believed that any of the criteria that should be applied when identifying Local Green Spaces has not been met. This should include the need to complement the need for investment in homes, jobs and services and that its designation must be capable of continuing beyond the plan period (2030), i.e. that the criteria will continue to be relevant. Many of the identified sites have the benefit of significant Local Plan protective designations either wholly or in part, for example Oyster Bend Field which abuts an SSSI. This therefore already offers a significant degree of protection. Furthermore, Central Government through its One Public Estate programme continues to direct local authorities to generate efficiencies, through capital receipts and reduced running costs from land holdings. In addition, the Local Government Association has specifically identified the use and income from Council assets to support core services. For this reason and also taking into account the Council's Corporate Asset Management Plan, a key policy framework document which states the Council should not restrict or reduce the current or future value of its assets through the use of covenants and other restrictions the Council now strongly objects to all proposed Local Green Space designations as set out in Paignton's Neighbourhood Plan in the attached schedule. There are a number of specific proposals for a number of the sites identified and any such designation would prevent the Council in bringing forward these proposals.

Ref No.	Location	Size	Ownership	TDA Comments
PLGS.01	Paignton Green North, Central and South	Abt 5 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.02	Victoria Park, Torquay Road	Abt 7 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.03	Torbay Park and Gardens, Esplanade Road	< 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.05	Palace Avenue Gardens	< 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.06	Burma Star Garden, Cliff Road	< 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.07	Roundham Head Park. East of Roundham Ave	Abt 3 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.08	St Michaels Field, Derrell Road and r/o St Michael's Road	< 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.09	Oakleigh St. Michaels Allotments, St Michaels Road	< 2 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.10	Derrell Road Allotments, St Michaels	< 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.11	Preston Green, Marine Drive	Abt 3 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.12	Parkfield, Lower Polsham Rd, South of Parkfield BMX facility	< 2 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.13	Coombe Valley Park, South West of Coombe Road, Preston	< 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.14	Hollicombe Cliff Park, east of Torquay Road, Preston	< 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.15	Hollicombe Park (part of), Torquay Road	< 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.16	Wills Avenue Playground, Wills Avenue	< 1 ha	Public	Possible future development of all or part - object to LGS designation

PLGS.17	Preston Gardens, Torquay Road	< 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.18	Oldway Mansion Gardens, Oldway Road/Torquay Road	Abt 8 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.19	Shorton Valley Woods, Shorton Valley Road	Abt 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.20	Hollacombe Allotments, Hollacombe Lane	< 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.21	Sandringham Gardens, Preston	< 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.22	Occombe Valley Woods, off Preston Down Road	Abt 37 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.23	Lower Penns Road Allotments, Lower Penns Road	< 2 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.24	Scadson Woods, Duchy Drive	Abt 9 ha (within PNP area)	Public	Possible future development of all or part - object to LGS designation
PLGS.25	Stanley Gardens, off Marldon Road and Barton Road	Abt 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.26	Ailescombe Road Allotments, Ailescombe Road	Abt 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.27	Monastery, Winner Hill	Abt 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.29	Paignton Cemetery, Colley End Road	Abt 4 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.30	Clennon Valley	Abt 67 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.31	Clennon Valley Allotments, Dartmouth Road	Abt 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.32	Quay West Corner, Brixham Road	Abt 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.33	Young's Park rec. and wetland area SW of Young's Park Rd, Goodrington	Abt 3 ha	Public	Possible future development of all or part - object to LGS designation

PLGS.34	Oyster Bend Field, east of Oyster Bend	Abt 2 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.35	Goodrington Community Orchard, Goodrington Road	< 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.36	Goodrington Village Green, Grange Road	< 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.37	Claylands Cross Park - Brixham Road, North of Harbourne Avenue	< 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.38	Gibson Road Playground, Gibson Road	< 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.39	White Rock Recreation Ground, Brixham Road	Abt 2 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.40	York Road Allotments, York Road	Abt 2 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.41	Hookhills Playground & Park, Freshwater Drive	Abt 1 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.42	Primley Park, South of Westleat Avenue	Abt 2 ha	Public	Possible future development of all or part - object to LGS designation
PLGS.43	Redwell Road	< 1 ha	Public	Possible future development of all or part - object to LGS designation