



# **Housing Site Assessment**

*An integral part of the Brixham Peninsula Neighbourhood Plan*



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## 1 Introduction

- 1.0.1 This **Housing Site Assessment** forms Document 3 of 10 of the formal set of documents which when taken together comprise the **Brixham Peninsula Neighbourhood Plan**.
- 1.0.2 The purpose of this document is to inform **Policy H3: Delivery of homes**.

## 2 Background

- 2.0.1 The amount of housing required in the Brixham Peninsula was set by Councillors of Torbay Council in the adopted Local Plan. The Brixham Peninsula Neighbourhood Forum made representations to the Local Plan process. Through these it succeeded in having the housing target of 1,320 homes revised down to the current housing target of 660 homes. However, following adoption of the Local Plan by the Full Council on 10 December 2015 this housing number is fixed and is not a matter which this Neighbourhood Plan can influence.
- 2.0.2 What the Neighbourhood Plan can do is bring forward housing in the most sustainable way by allocating the most appropriate housing sites. The Neighbourhood Plan can also provide detailed design guidance to inform how these homes should look. Consultation feedback has indicated a preference by the community that the Neighbourhood Plan does just this. Accordingly, in the main written statement of the plan **Policy H3: Delivery of homes** allocates sites and **Policy H5: Good design and the town and village Design Statements** provides design guidance.
- 2.0.3 The purpose of this Housing Site Assessment is to evidence that through **Policy H3: Delivery of new homes** this Neighbourhood Plan has allocated sufficient land to meet the Local Plan expectation of 660 new homes.<sup>1</sup>

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<sup>1</sup> The expectation of 660 new homes assumes that Churston Golf Course is not one of the sites allocated for development. Following the logic of table 5.14 on page 44 of Inspector Holland's report on the Local Plan, in the event that Churston Golf Club was allocated as a site in the Neighbourhood Plan the target would increase by the size of any allocation. Hence in the event of a site of 130 new homes, the Neighbourhood Plan expectation would increase to 790 new homes.

### 3 Methodology

3.0.1 The starting point was to consider **committed sites** which exist across the Brixham Peninsula. Committed sites are those sites where there is a valid planning permission in place which either:

- has been delivered, i.e. where the homes have already been built in the period since the start of the Neighbourhood Plan in April 2012; or
- is capable of being delivered, i.e. where there is no clear evidence that planning permission will **not** be implemented within five years because there are impediments to their development, for instance, because a site is not viable, because there is no longer a demand for the type of units, a site has long-term phasing plans or there are other impediments.

3.0.2 As at December 2016, there are 306 homes in the Neighbourhood Plan area which can be brought forward on committed sites. The majority of these committed sites were already allocated in the Local Plan. However, due to the time lag since adoption of the Local Plan other new committed sites have come forward. Full details on all the committed sites are given below.

3.0.3 The next step was to consider the **windfall sites** which have been determined by the Local Plan as likely to arise during the plan period. Windfall sites are defined as sites which either:

- are for 5 or fewer homes, or
- are unanticipated and so have not been planned for in a development plan.

3.0.4 Such windfalls account for a further 234 homes.

3.0.5 Subtracting from the total 660 homes requirement, the 306 committed sites and the 234 windfall sites means that the Neighbourhood Plan would need to allocate sites for (at least) a further 120 homes in order to be able to meet the

full Local Plan expectation. These further sites are referred to as **allocated sites**.

- 3.0.6 The allocated sites were subject to rigorous assessment as part of the Neighbourhood Plan making process.
- 3.0.7 Sites identified in the Local Plan as potential housing sites and sites identified by the Local Authority in the Strategic Housing Land Availability Assessment (SHLAA) in both the 2008 and 2013 versions were assessed. Also assessed were all other sites known to the Neighbourhood Forum either by having been discussed within the local community, put forward by developers at one of the many consultation events, brought forward in the Neighbourhood Forum's call-for-sites process or otherwise.
- 3.0.8 The assessment took the form of each site being measured against three criteria, namely, **suitability**, **availability** and **achievability**. A site is considered suitable if there are no insurmountable physical or environmental factors which would restrict its development. A site is available if there is evidence that a landowner or developer is willing to sell or develop the site in the future within the plan period. A site is considered achievable when there is evidence that it is economically viable and there is a reasonable prospect that the particular type of development will be developed within the plan period, i.e. that it is "developable" in accordance with note 12 to paragraph 47 of the National Planning Policy Framework (NPPF).
- 3.0.9 In order to ensure the most robust approach to identified housing sites, the assessment when considering suitability was mindful of the objectives and policies of the Neighbourhood Plan particularly as regards to:
- giving priority of protection to the Area of Outstanding Natural Beauty (AONB)
  - protecting landscape features and other protected landscapes

- keeping development within settlement boundaries and avoiding urban expansion into the countryside
- reflecting and enhancing local character and distinctiveness
- spreading development across the Brixham Peninsula to provide an equitable distribution of new homes and new opportunities.

3.0.10 Again, in order to ensure the most robust approach to identified housing sites and for the purposes of ensuring the Local Authority had a **5-year land supply**, the assessment when looking at achievability also considered whether the site could come forward within the next 5 years, i.e. that it is “deliverable” in accordance with note 11 to paragraph 47 of the NPPF.

## 4 Process

4.0.1 In the Town of Brixham, primary reliance was placed on SHLAA sites as a pool of potential identified sites. Additional sites were then added as the Master Plan work for the Town Centre and Harbour progressed and as developments with Brixham Hospital took place.

4.0.2 In the villages of Churston, Galmpton and Broadsands, primary reliance was placed on community identified sites and the feedback from a survey of all households in the area. These results were assimilated and resulted in proposals which were showcased at a Churston, Galmpton and Broadsands Community Partnership meeting in November 2012. This meeting had been advertised widely in the local community including in the Winter 2012 (edition 28) circulation of the community magazine *The Gazette* which is distributed to every household.

4.0.3 This approach was taken by the villages as, in some contrast to Brixham Town, there was concern that SHLAA sites (and in particular Churston Golf Club) could not be relied on to come forward and did not have local support. Given subsequent events (including a refused planning application, a further

withdrawn planning application and a failed appeal) this concern proved to be well founded.

- 4.0.4 In addition, the Princes Foundation held well advertised workshops which added to the pool of sites. The first workshop in December 2012 looked at site options from a strategic standpoint whilst the second workshop in March 2013 focussed on reviewing the SHLAA.
- 4.0.5 The lead consultant acting for the Princes Foundation, Jeremy Caulton, assisted by the Former Head of Planning for South Hams District Council, Lee Bray, were then employed as consultants to develop the assessment of identified sites. Their conclusions were accepted in May 2014. In particular, this resulted in the densities of some sites being increased (e.g., Waterside Quarry) and the densities at other sites being reduced (e.g., Knapman's Yard).
- 4.0.6 Ecological surveys were undertaken for all sites which had any potential to be allocated. This is set out further in the Brixham Peninsula Neighbourhood Plan Habitat Regulations Assessment (HRA) screening document. This work resulted in certain sites not being able to be allocated without risk that the Neighbourhood Plan would require Appropriate Assessment (e.g., the Archery Field at Churston, albeit there may be potential for this site to come forward as a windfall during the plan period). This work also resulted in other sites falling away as owners did not want to make expenditure at this stage on further survey work which called into question the availability and achievability of certain sites (e.g., Greenaway Road).
- 4.0.7 The Forum also sought advice on viability from local agents. Advice was sought from Graham Barton and Scott Gray of Clive Emson Auctioneers as seen on the BBC Television program "Homes Under the Hammer" and Mark Boyce of Boyce Brixham estate agents. This was considered important as an owner of a site identified in the Local Plan called into question the viability of developments on his own site at a Forum meeting. Following this advice some sites identified in the Local Plan were considered not to be viable as residential development

opportunities as they were more valuable in their current form of very well presented family homes (e.g., Kings Barton and Beverley Court).

- 4.0.8 At this stage final advice was sought from a qualified Neighbourhood Plan examiner Liz Beth who was employed to advise on the Neighbourhood Plan in the final stages of its production to ensure it was robust.
- 4.0.9 In addition, the international firm of consultants AECOM were instructed through Locality (a Neighbourhood Plan advisory body funded by HM Government) to undertake their own independent Housing Site Assessment. Specifically, this work was undertaken without AECOM having seen the Housing Sites Assessment produced by the Neighbourhood Forum.
- 4.0.10 The independent AECOM-produced Housing Sites Assessment has been interpreted by the Neighbourhood Forum as providing support for this Housing Sites Assessment which forms part of this Neighbourhood Plan. In particular, both assessments independently selected the same housing sites.
- 4.0.11 There are, however, some differences between the assessments. AECOM have used a standard minimum density assumption of 30 dwellings per hectare for all sites for which a density was not identified in the 2013 SHLAA. This is because 30 dwellings per hectare is specified in the Local Plan as a minimum assumed density as follows:

*6.4.1.12 When assessing affordable housing requirements, regard will be had to the overall site, to avoid it being subdivided or artificially developed in phases as a way of reducing the liability to affordable housing. It will be assumed as a starting point that sites are capable of providing 30 dwellings per hectare gross, although extenuating factors will be considered. Developments of apartments are likely to be capable of providing significantly higher levels than 30 dwellings per hectare.*

*6.4.2.20 New dwellings will be expected to strike an appropriate balance between making good use of land, whilst avoiding town*

*cramming or harm to neighbours' amenities. As a general guideline, a minimum density of 30 dwellings per hectare will be sought on greenfield sites. However, in some instances landscape or ecology considerations may dictate lower densities.*

- 4.0.12 There is reason to believe, in hindsight, that the 30 dwellings per hectare figure may have been too low for sites in Brixham. It has been discussed with AECOM that it may have been more appropriate, in hindsight, to have assumed a density of 30 dwellings per hectare for the villages and 50 dwellings per hectare for urban sites in the town. It was agreed that were the AECOM assessment to be the main evidence base for Policy H3, their assessment could be updated with this revised assumption, but that all things considered this was not necessary.
- 4.0.13 This is because this Housing Sites Assessment attempts to go further and assign individual minimum densities to individual sites. As such, some sites have higher assumed densities than assumed by AECOM and some sites have lower assumed densities. Overall, the delivery numbers across the Neighbourhood Plan area as a whole are broadly comparable. For completeness, AECOM's figures are presented in Table 1 below to allow proper comparison.
- 4.0.14 Further sites came forward at the Regulation 14 consultation stage when all sites were reconsidered in light of the consultation feedback. These two new sites were the Former Jewson (H3 – I8) and Caster Road (H3 – I9). Having been so advised by Liz Beth on these sites this Neighbourhood Plan allocates them. As set out in more detail below, the Former Jewson is a brownfield site and Caster Road is within the settlement boundary and well related to existing development. These sites were not assessed by AECOM in their Housing Site Assessment, but are in their Strategic Environmental Assessment.

## 5 Summary conclusions

Table 1: Summary of Brixham Peninsula Neighbourhood Plan sites.

	Neighbourhood Plan Reference	Local Plan Reference	Site Name	Homes	AECOM Homes
<b>Committed Sites</b>					
<b>Brixham Town</b>					
	H3 – C1	CDSB3	Wall Park Holiday Camp	173	
	H3 – C2	CDSB7	Sharkham Village	31	
	H3 – C3	BPNPH4	Fishcombe	30	
	H3 – C4	CDSB5	Kings Drive	22	
	H3 – C5	CDSB6	Douglas Avenue	12	
	H3 – C6	–	Bakers Hill	6	
<b>Churston, Galmpton and Broadsands</b>					
	H3 – C7	CDSB1	Churston Court Barns	9	
	H3 – C8	–	Gliddon Ford	9	
	H3 – C9	BPNPH1	5 Broadsands Road	8	
	H3 – C10	–	Broadsands House	6	
<b>Total</b>				<b>306</b>	
<b>Windfall Sites</b>				<b>234</b>	
<b>Allocated Sites</b>					
<b>Brixham Town</b>					
	H3 – I1	CDSB4	Brixham Town Centre	25	14
	H3 – I2	BPNPH11	St Mary's/Old Dairy	25	25
	H3 – I3	–	St Kilda	12	7
	H3 – I4	BPNPH5	Northcliffe Hotel	15	15
	H3 – I5	BPNPH6	Torbay Trading Estate	15	15
	H3 – I6	BPNPE1	Oxen Cove / Freshwater Quarry	10	50
	H3 – I7	BPNPH8	Brixham Police Station	7	12
	H3 – I8	–	Former Jewson	20	
	H3 – I9	–	Castor Road	10	
<b>Churston, Galmpton and Broadsands</b>					
	H3 – I10	–	Waterside Quarry	10	18 <sup>2</sup>
	H3 – I11	BPNPH3	Knapman's Yard	6	8
<b>Total</b>				<b>155</b>	
<b>Total Sites</b>				<b>695</b>	

<sup>2</sup> Note: The AECOM assessment of Waterside Quarry (H3 – I10) uses a site area of 0.9 ha. The figure of 18 is a pro-rata adjustment of their figure of 21 given an allocated site area of 0.79 ha.



## 6 Committed sites

6.0.1 Committed sites are set out below in Table 2 and then on the pages which follow there are allocation maps of each committed site. On some of these sites development has been completed, on others construction is underway and all others have planning permission which is deliverable.

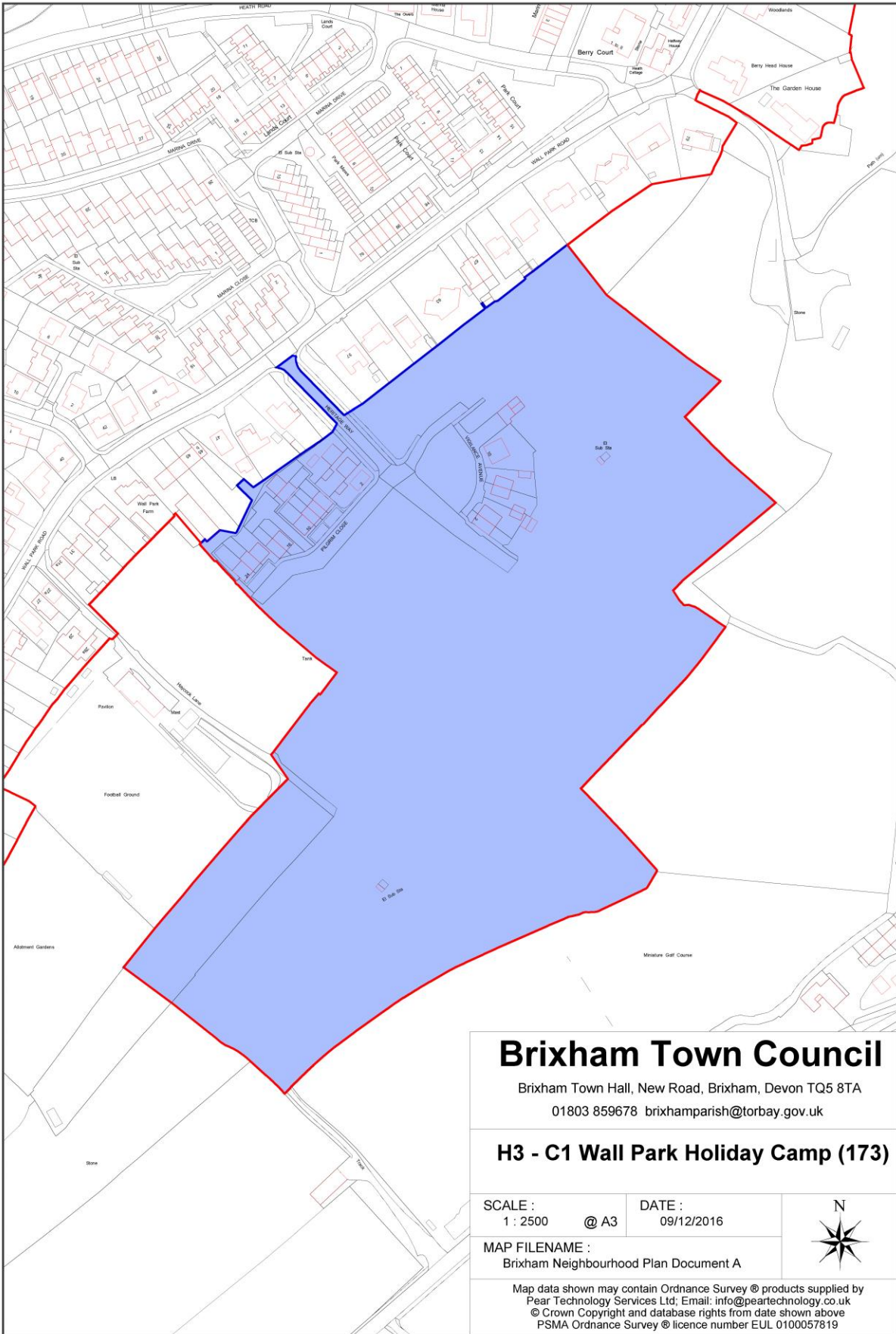
6.0.2 In contrast, other sites with valid planning consents have been determined not to be developable. For example:

- Brixham Town Centre (Local Plan ref. CDSB4). As reported in the local press following the change in business strategy by Tesco post their accounting issues, this site is no longer proceeding in the way envisaged in the consented application. The site is instead part of a Master Plan process and is referred to in the identified sites below.
- Berry Head Garage (Local Plan ref. CDSB2). This site has been subject to a revised planning application for 4 homes (which would count as a windfall). The Design and Access Statement for that application (P/2015/0705) makes specific reference to the previously consented scheme for 6 units not being viable for various reasons.

6.0.3 The site known as Walcot (P/2014/0783) was an application for new 6 homes following the demolition of the existing home on the site, i.e. 5 net new homes. As such it has been deemed to be windfall. This differentiates it from Broadsands House where the home which previously stood on the site had already been demolished at the time of the planning application for 6 new homes.

Table 2: Committed housing sites.

<b>Neighbourhood Plan Reference</b>	<b>Local Plan Reference</b>	<b>Site Name</b>	<b>Homes</b>	<b>Description</b>
<b>Brixham Town</b>				
H3 – C1	CDSB3	Wall Park Holiday Camp	173	Full planning application P/2013/0785 for 165 homes; Full planning application P/2016/0057 to replace 10 dwellings with 18 dwellings (i.e. 8 additional homes)
H3 – C2	CDSB7	Sharkham Village	31	Full planning application P/2015/0003 for 31 homes
H3 – C3	BPNPH4	Fishcombe	30	Certificate of lawfulness P/2013/1363
H3 – C4	CDSB5	Kings Drive	22	Full planning application P/2006/1066 for 35 homes of which 13 were built before the plan period
H3 – C5	CDSB6	Douglas Avenue	12	Full planning application P/2011/0470 for 12 homes
H3 – C6	–	Bakers Hill	6	Full planning application P/2014/0465 for 6 homes
<b>Churston, Galmpton and Broadsands</b>				
H3 – C7	CDSB1	Churston Court Barns	9	Full planning application P/2010/0177 for 9 homes
H3 – C8	–	Gliddon Ford	9	Outline planning application P/2014/0687 for up to 10 homes Full planning application P/2016/0206 for 9 homes
H3 – C9	BPNPH1	5 Broadsands Road	8	Full planning application P/2014/0899 for 8 homes
H3 – C10	–	Broadsands House	6	Full planning application P/2015/0192 for 6 homes
<b>Total</b>			<b>306</b>	



## Brixham Town Council

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### H3 - C1 Wall Park Holiday Camp (173)

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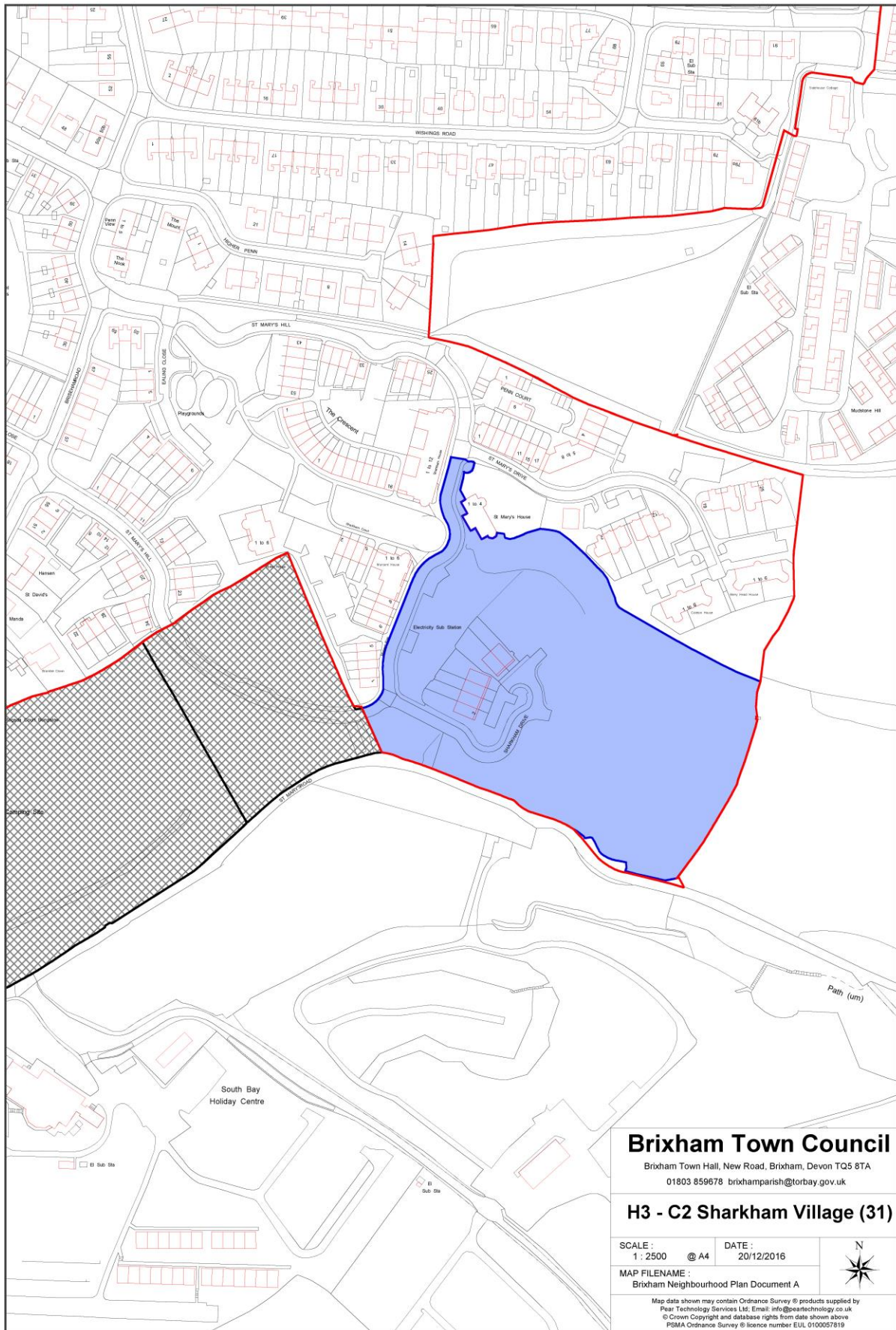
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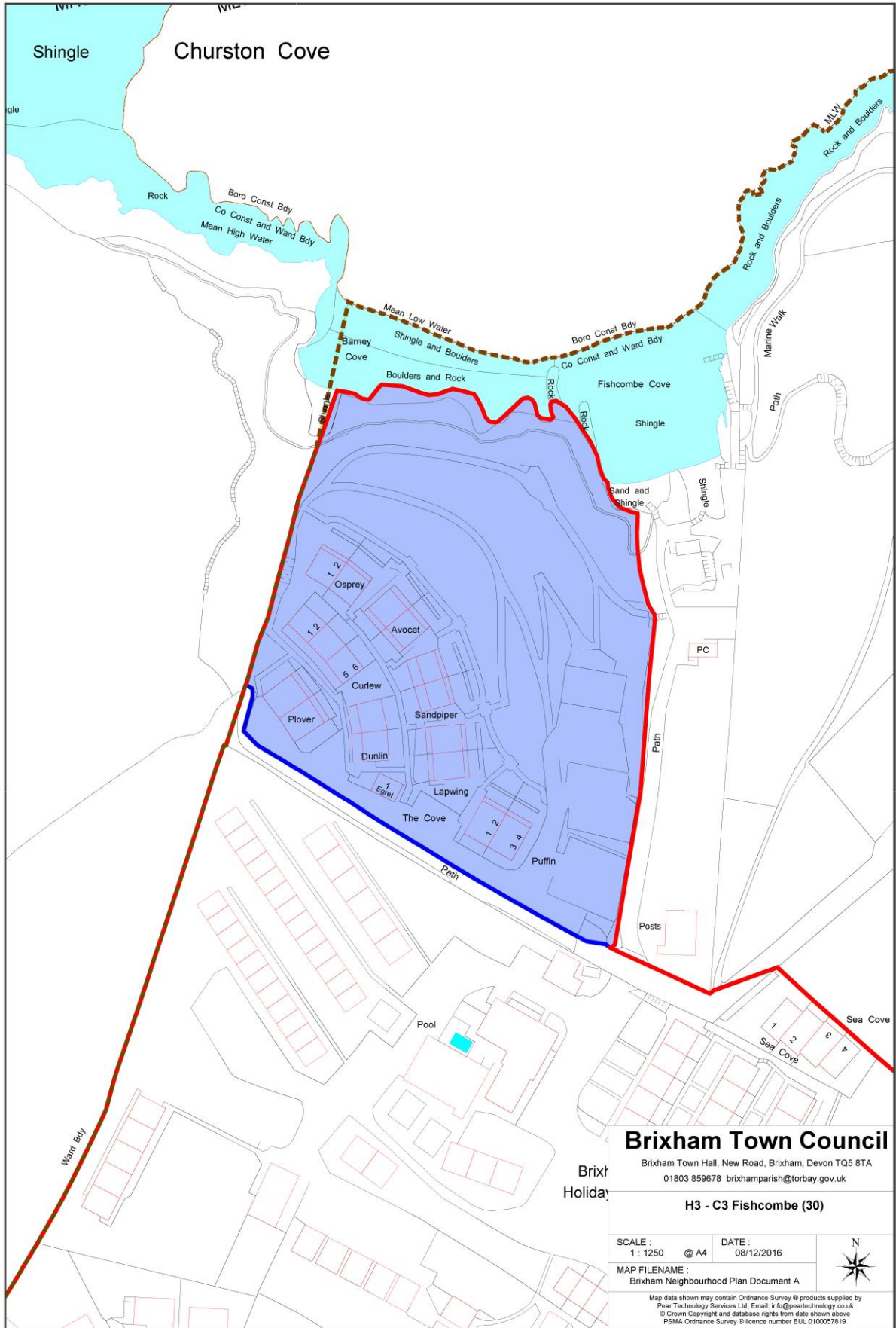


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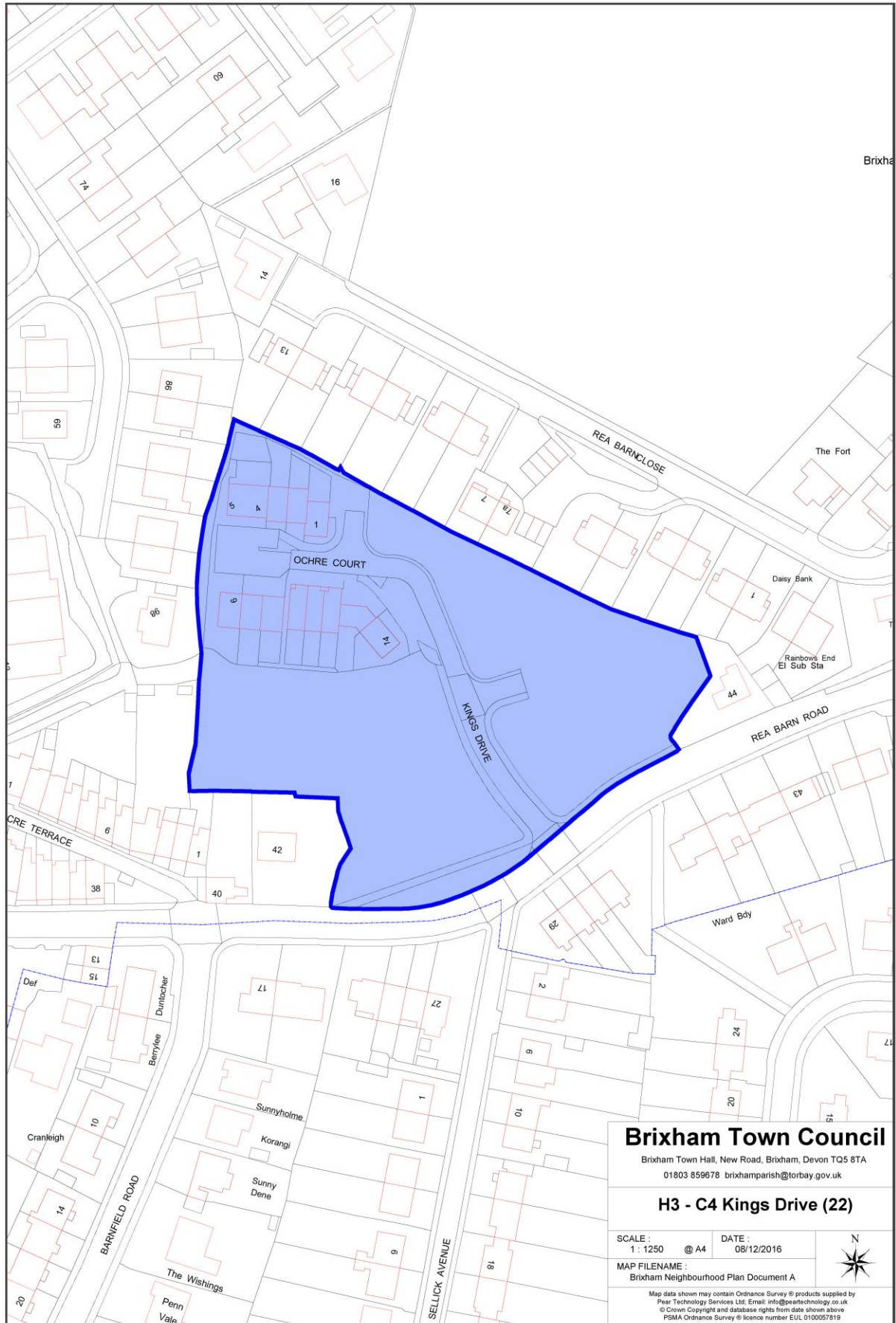


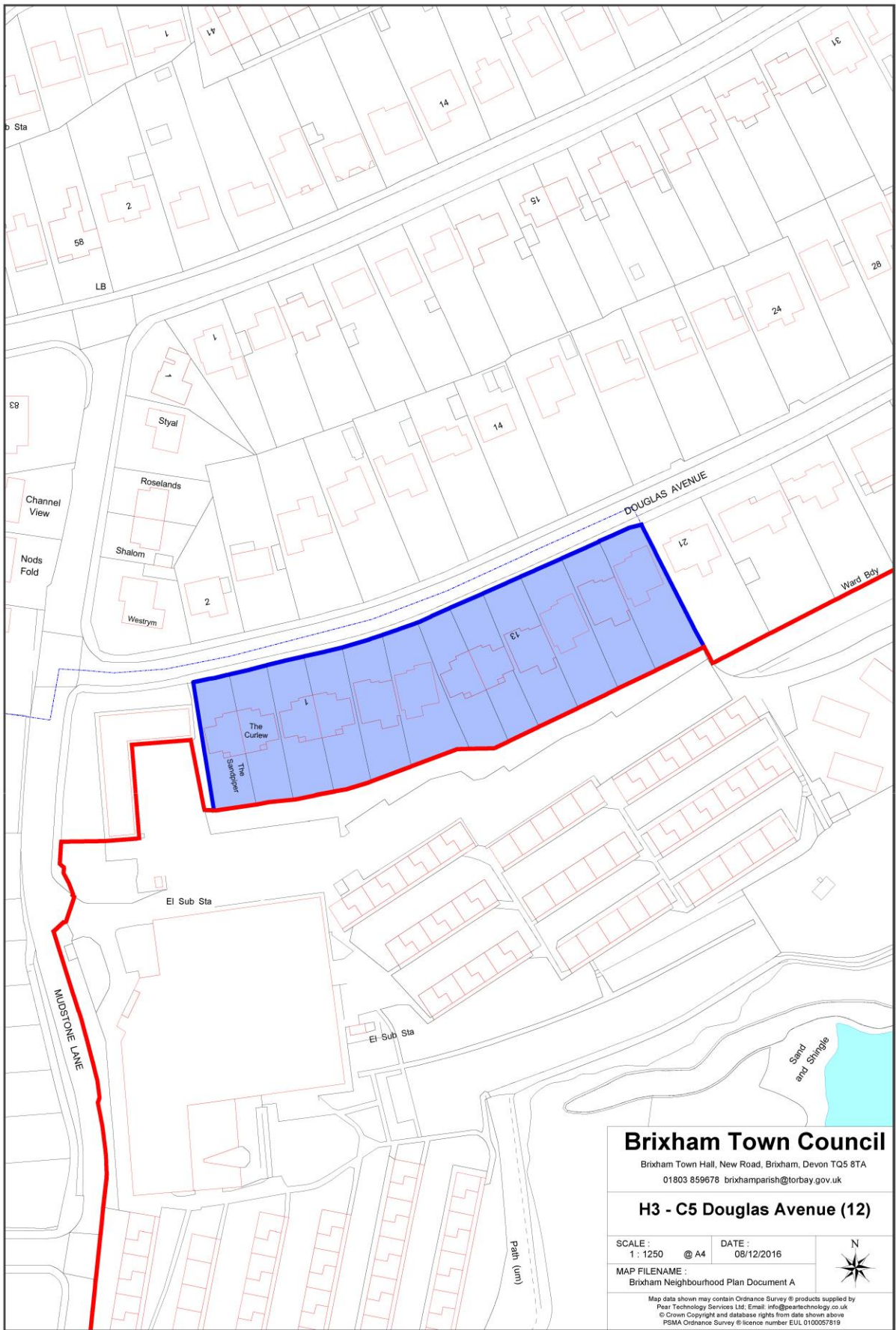
# Housing Site Assessment





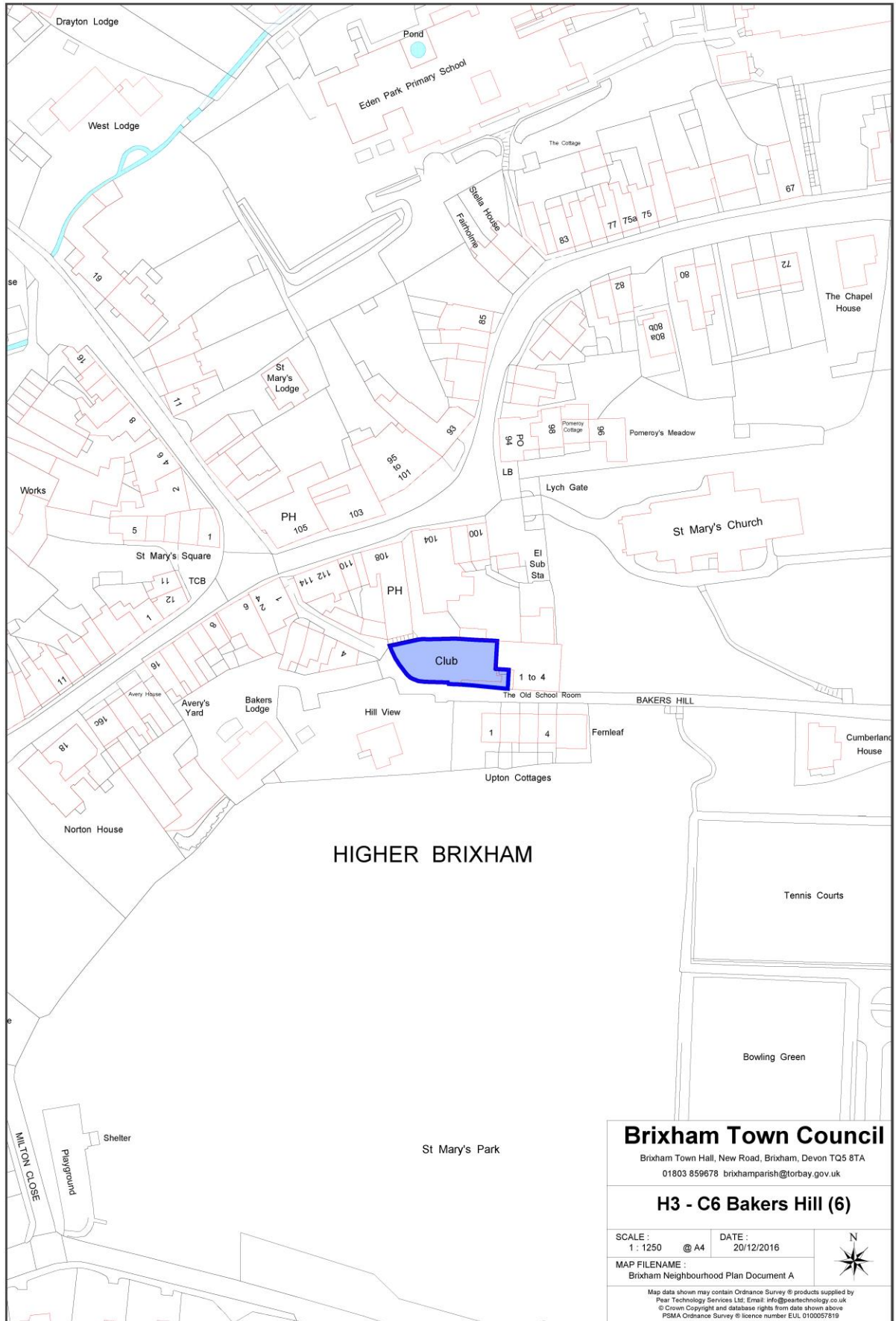








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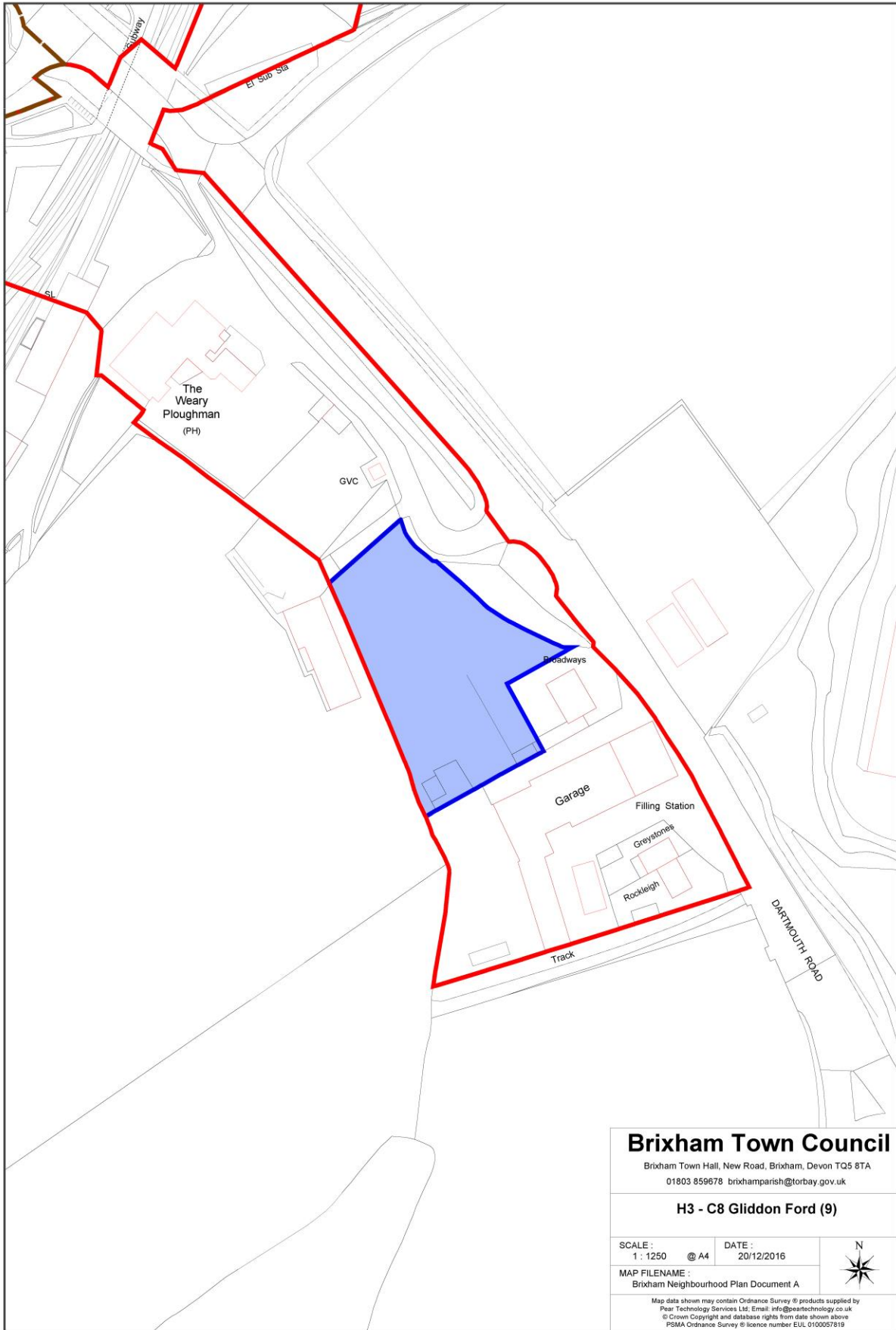


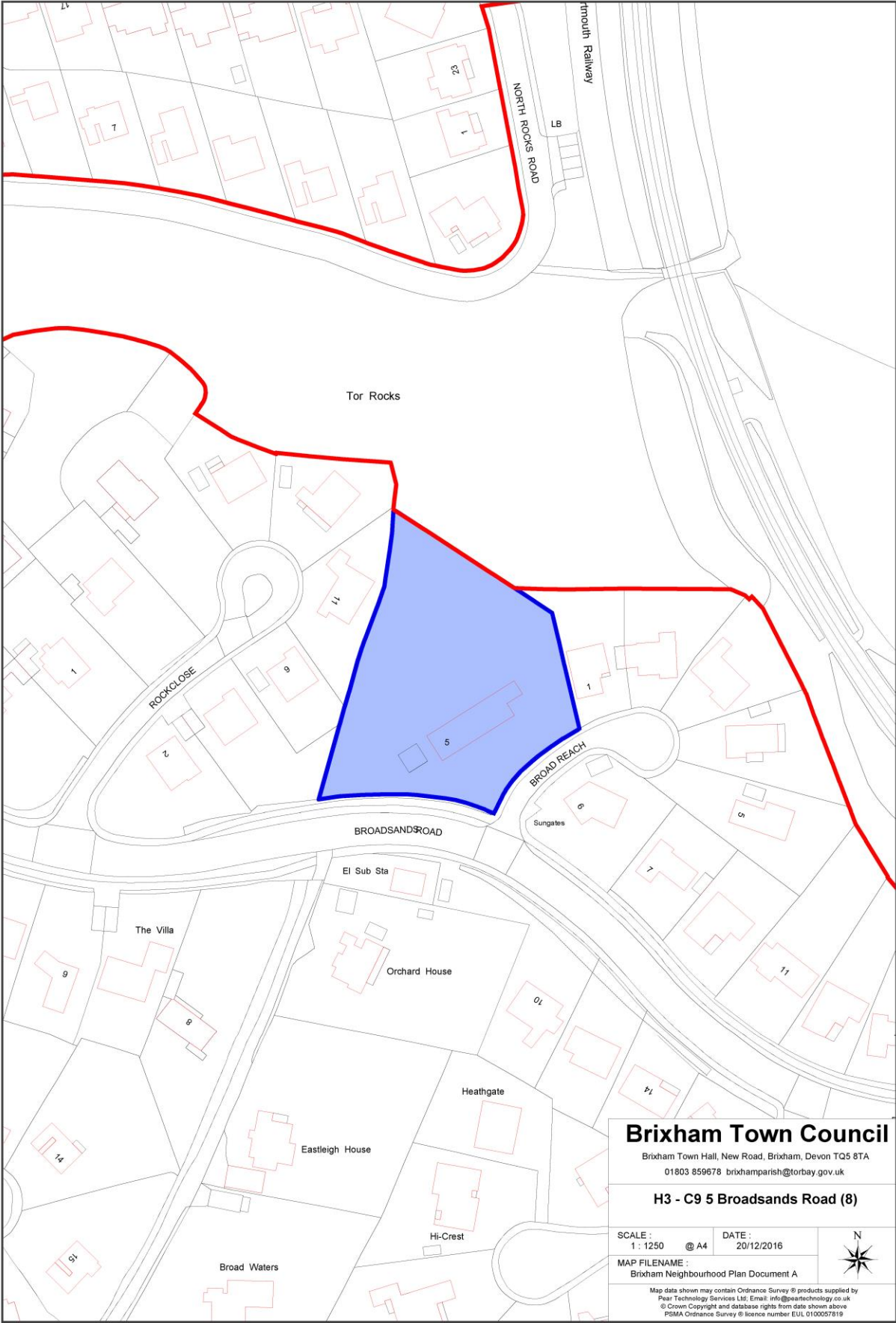


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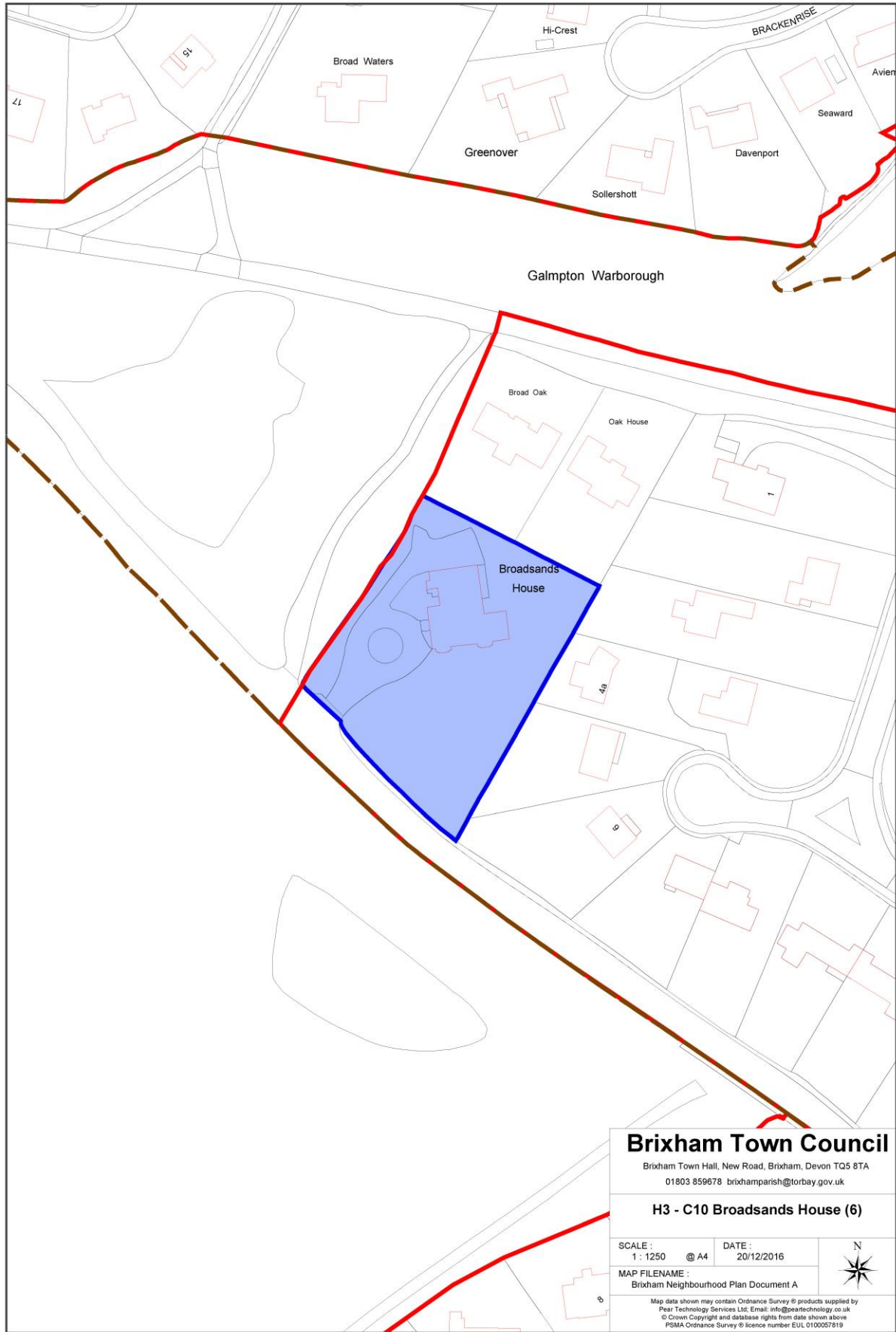
**H3 - C7 Churston Court Barns (9)**

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MAP FILENAME: Brixham Neighbourhood Plan Document A			









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**H3 - C10 Broadsands House (6)**

SCALE : 1 : 1250 @ A4 DATE : 20/12/2016

MAP FILENAME : Brixham Neighbourhood Plan Document A



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## **7 Allocated sites**

7.0.1 Allocated sites are summarised in Table 3. In the pages which follow there are full individual site by site assessments including detailed allocation maps of each site.

7.0.2 Where appropriate, sites which appear in the pool of potential Neighbourhood Plan sites in Appendix C of the Local Plan have been allocated. For various reasons, other sites which appear in this pool have not been able to be allocated. These sites include:

- Churston Golf Course (BPNPH2). Information submitted by Torbay Council to the Local Plan inquiry argued that this site “appeared to be undeliverable” (para 67 of the Inspectors Report). The Neighbourhood Plan has determined this site is undeliverable and hence for this and other reasons this site is a rejected site.
- 74 New Road (BPNPH7). This site has been the subject of a planning application for 3 homes which is counted as a windfall development and not an allocated site.
- Kings Barton (BPNPH9). Based on advice from estate agents this site is considered by the Neighbourhood Plan not to be viable as a development site as it currently comprises a very well appointed family home. This has not been challenged by the site owner in the Regulation 14 consultation.
- Beverley Court (BPNPH10). As with Kings Barton, based on advice from estate agents this site is considered by the Neighbourhood Plan not to be viable as a development site as it currently comprises a very well appointed family home and was only recently sold for this purpose. Again, this has not been challenged by the site owner in the Regulation 14 consultation.

*Table 3: Allocated housing sites.*

<b>Neighbourhood Plan Reference</b>	<b>Local Plan Reference</b>	<b>Site Name</b>	<b>Homes</b>
<b>Brixham Town</b>			
H3 – I1	CDSB4	Brixham Town Centre	25
H3 – I2	BPNPH11	St Mary's/Old Dairy	25
H3 – I3	–	St Kilda	12
H3 – I4	BPNPH5	Northcliffe Hotel	15
H3 – I5	BPNPH6	Torbay Trading Estate	15
H3 – I6	BPNPE1	Oxen Cove and Freshwater Quarry	10
H3 – I7	BPNPH8	Brixham Police Station	7
H3 – I8	–	Former Jewson	20
H3 – I9	–	Castor Road	10
<b>Churston, Galmpton and Broadsands</b>			
H3 – I10	–	Waterside Quarry	10
H3 – I11	BPNPH3	Knapman's Yard	6
<b>Total</b>			<b>155</b>

### **H3 – I1: Brixham Town Centre**

#### *Address*

Brixham Town Centre Car Park, Bank Lane, Brixham

#### *Site Area*

0.61 ha

#### *Description*

Large site of previously developed land located in the centre of Brixham which is mainly used as a car park.

#### *Amount of Development*

Based on part of the site area (0.61 ha) being used for housing, it is considered that the site could support at least 25 residential units at a density of 41 dwellings per hectare (dph).

#### *Planning Policy*

The site is wholly within the Town Centre Conservation Area and is proposed for a mixed-use development.

#### *SHLAA Status*

Identified by the SHLAA (ref. AI H1:018) for 14 dwellings to be delivered within years 0–5.

Note that the site was the subject of an approved planning application (P/2012/1309) for a supermarket which included *inter alia* provision for 14 dwellings. However, the developers subsequently stated that they would not proceed with the scheme for financial reasons relating to their overall business.

#### *Opportunities*

The Neighbourhood Forum has produced a Town Centre Master Plan for the development of this particular site, see Document 10 of the Neighbourhood Plan. It

includes a two-storey car park, a hotel (or possibly a large retail unit) and 25 dwellings. The whole area is centrally located with easy access to retail units and public transport.

### *Constraints*

Part of the site may be contaminated because of its use many years ago as a gas works. In addition, the site lies wholly within a Flood Zone 3 category. A flood risk assessment must be undertaken with any planning application for this site. It is considered that the flood risk could be mitigated but the application will need to demonstrate this. Mitigation could include locating the residential element above retail units, above garages or on a plinth above the flood zone.

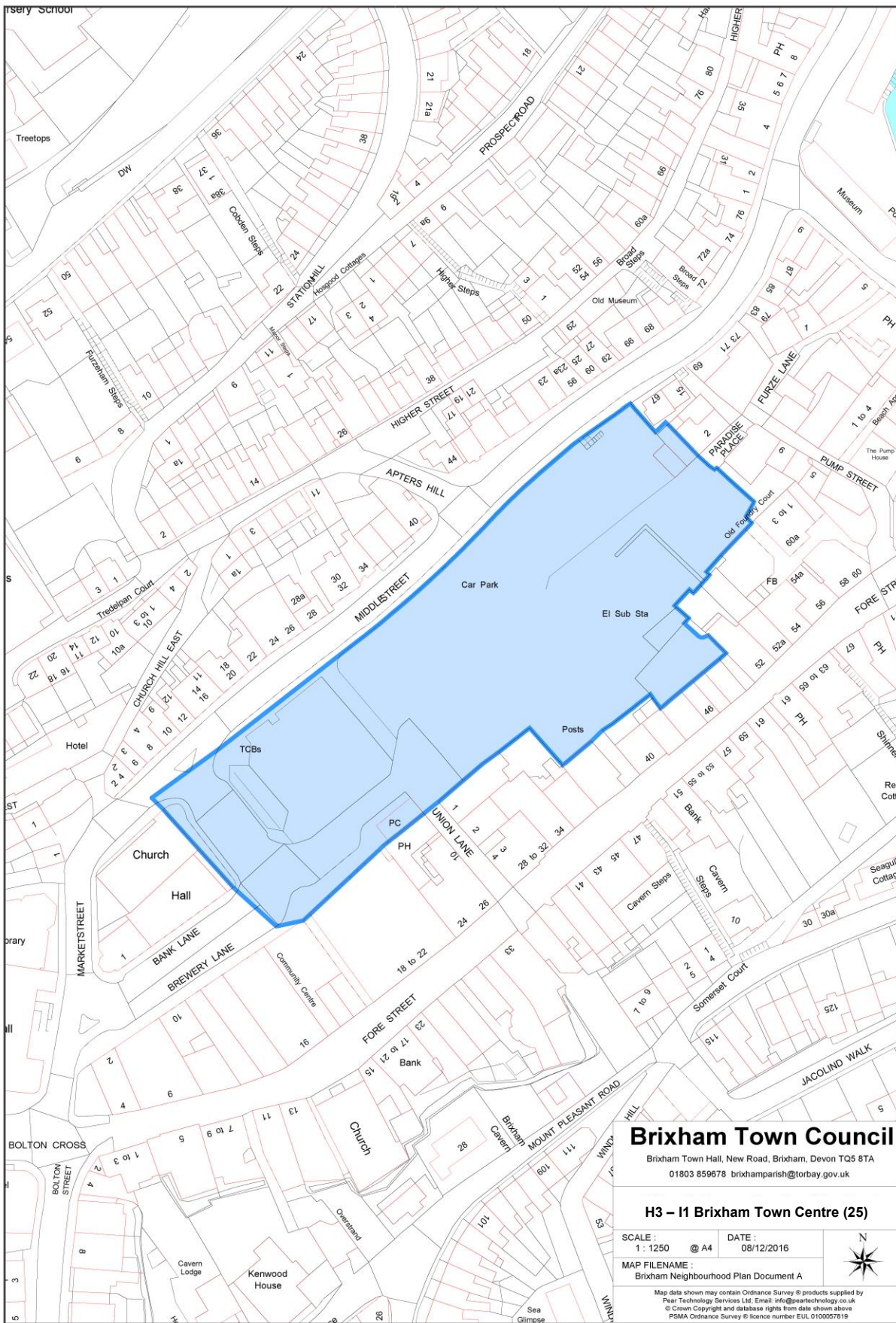
### *Assessment Conclusions*

Site is suitable	Y
Site is available	Y
Site is achievable	Y

### *Conclusions*

The site is suitable and viable and it is believed that development of this site would be of great benefit to the town. The flood risk will need to be mitigated at the project application stage, but this appears realistic and viable at this earlier plan making stage. The site is appropriate as an allocation in the Neighbourhood Plan.





### **H3 – I2: St Mary’s Industrial Estate/Old Dairy**

#### *Address*

St Mary’s Industrial Estate, St Mary’s Road, Brixham

#### *Site Area*

0.5 ha (excluding the field adjacent St Mary’s Industrial Estate)

#### *Description*

The St Mary’s Industrial Estate site is located to the north of St Mary’s Road while the Old Dairy site is to the south. The Industrial Estate site consists of a series of older buildings which form an industrial estate variously used for car repair workshops etc. It also includes, as per the maps which accompanied the Local Plan and the SHLAA, an adjacent field to the east of the main industrial estate. This field includes the remains of a former building which has largely blended into the landscape in the process of time. The Old Dairy site consists of the currently disused buildings of a former dairy.

#### *Amount of Development*

Based on the site area of 0.5 ha, it is considered that the site could support at least 25 residential units at a high density of 50 dph.

#### *Planning Policy*

The St Mary’s Industrial Estate site lies within the AONB. The Old Dairy abuts the AONB boundary. Given the proximity of the site to the Special Area of Conservation (SAC), Greater Horseshoe Bats are a consideration.

#### *SHLAA Status*

Identified by the SHLAA (ref. AI H1:021) for 25 dwellings to be delivered within years 10–20.

*Opportunities*

The current buildings at the St Mary's Industrial Estate and Old Dairy sites are in a lower state of repair. The land could be developed either through conversions of existing buildings or demolition and new build to provide a more efficient use of land.

*Constraints*

The St Mary's Industrial Estate site lies within the AONB and only part of this site is assessed to be previously developed land. Any development would need to take account of Greater Horseshoe Bats which are known to fly across or adjacent to the site. The Ecological Assessment undertaken by Kestrel of the St Mary's Industrial Estate site made reference to the importance of retaining the hedge (which separates the Industrial Estate from the adjacent field). Access to the site is also quite tortuous.

*Assessment Conclusions*

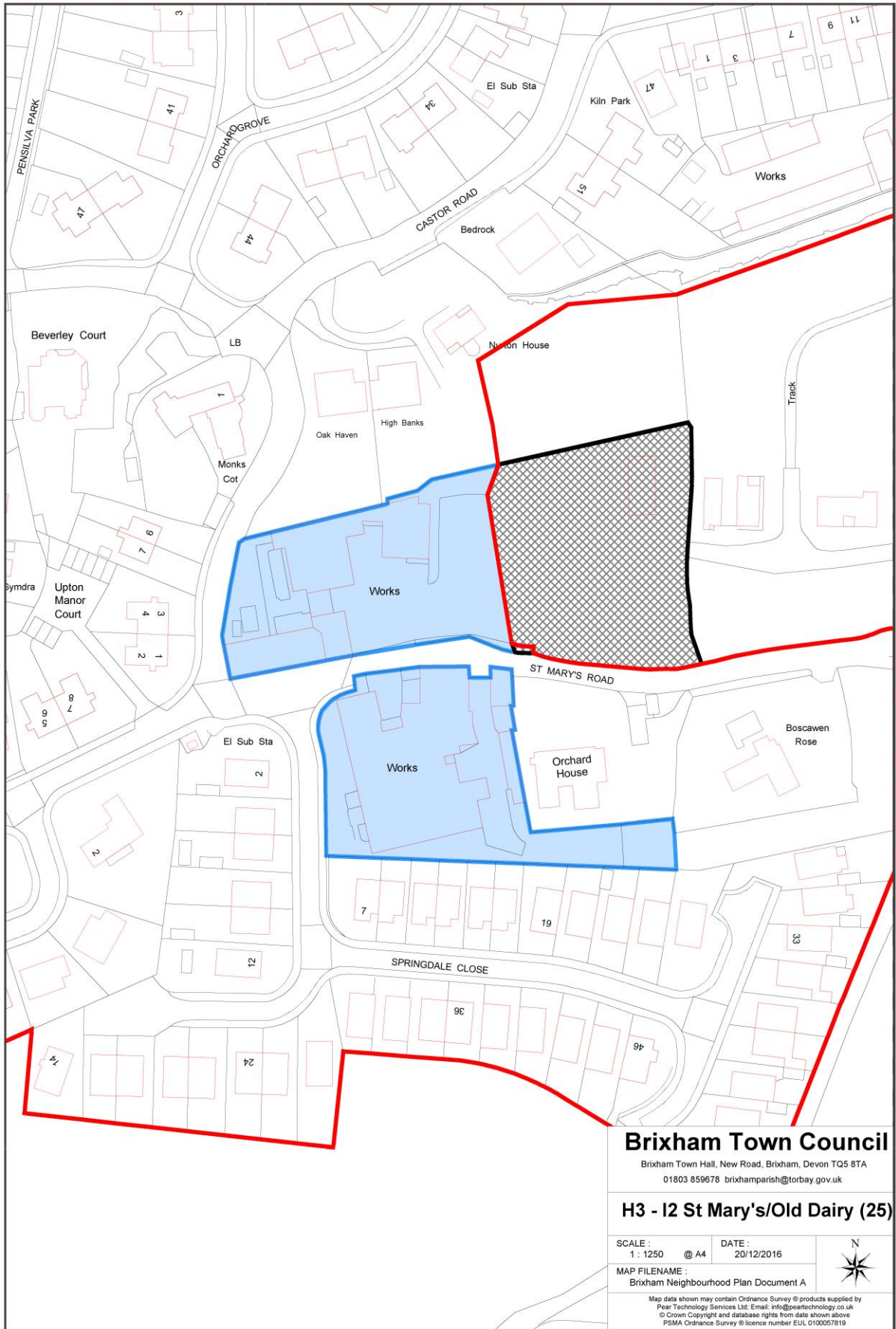
Site is suitable	Y
Site is available	Y
Site is achievable	Y

*Conclusions*

The St Mary's Industrial Estate (excluding the field) and Old Dairy sites are considered suitable and viable and it is believed that plans for their development are currently being considered by the landowner. These are appropriate for allocation in the Neighbourhood Plan. It is not considered appropriate to allocate the field for development. Accordingly in the allocation maps the field is shown as a rejected site.



# Housing Site Assessment



### **H3 – I3: St Kilda**

#### *Address*

St Kilda, Drew Street, Brixham

#### *Site Area*

0.25 ha

#### *Description*

St Kilda is a 36-bed purpose-built care home which additionally provides day care. It is understood the care home is scheduled for closure and if so the site could be redeveloped and would constitute a brownfield site in the urban area of Brixham.

#### *Amount of Development*

Based on the site area of 0.25 ha, it is considered that the site could support at least 12 residential units for assisted living at a density of 50 dph.

#### *Planning Policy*

Part of the site lies within a conservation area and any development proposal would need to pay regard to the need to conserve and if possible enhance the conservation area.

#### *SHLAA Status*

Not identified in the SHLAA

#### *Opportunities*

The current facility is scheduled to close with the services, in part, being moved to another location. This presents the existing site as an opportunity for development. It is considered that the site could provide 12 assisted living dwellings in the urban area of Brixham.

#### *Constraints*

No specific constraints identified.

## Housing Site Assessment

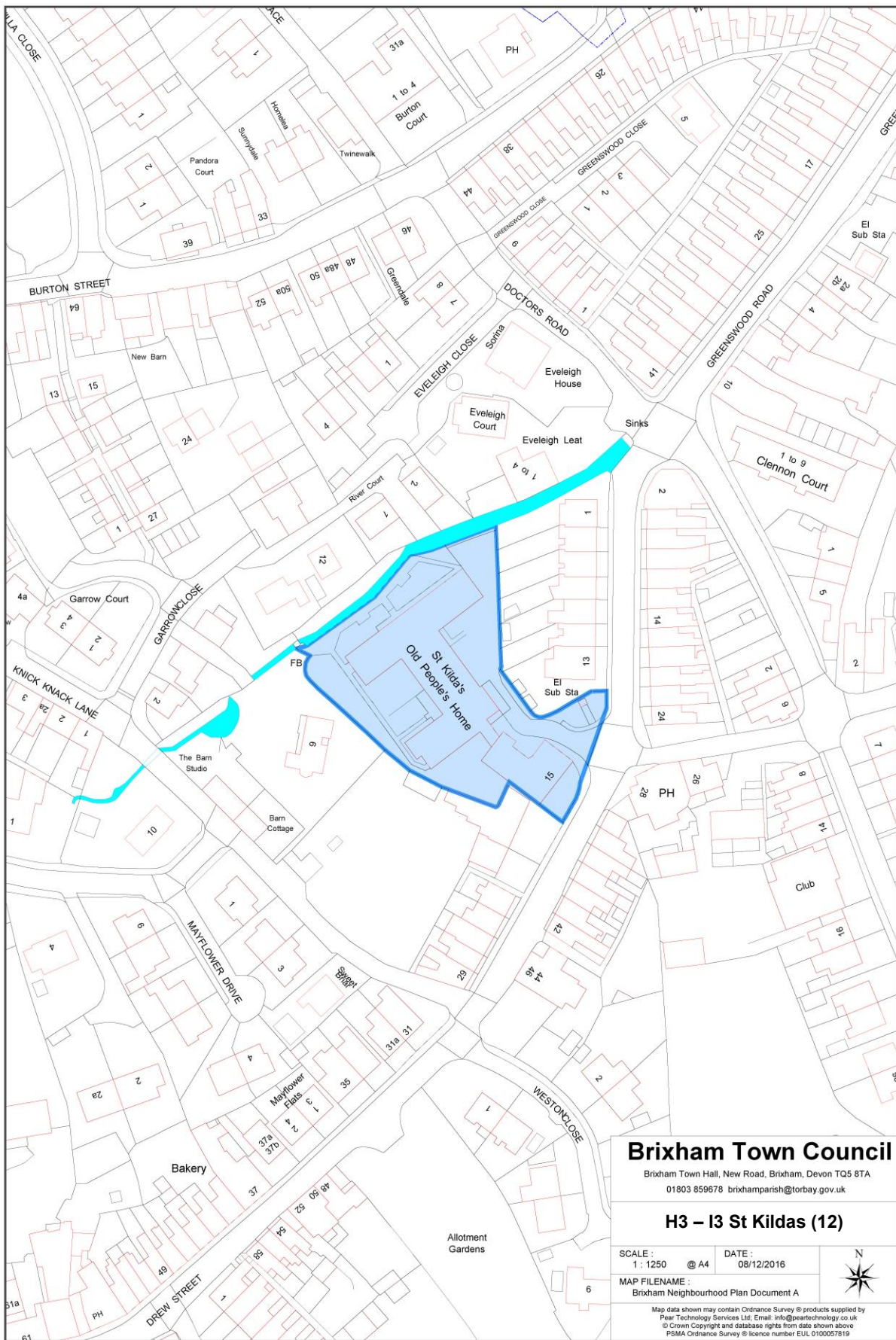
### *Assessment Conclusions*

Site is suitable	Y
Site is available	Y
Site is achievable	Y

### *Conclusions*

The site is appropriate for allocation in the Neighbourhood Plan. It is important to ensure the units which come forward are for assisted living and not open market housing in line with Policy HW1.





### **H3 – I4: Northcliffe Hotel**

#### *Address*

Northcliffe Hotel, North Furzeham Road, Brixham

#### *Site Area*

0.29 ha

#### *Description*

Previously developed land (C1 – Hotel) which was the site of the former Northcliffe Hotel. Following fire damage in 1994 the hotel was demolished. The site now consists of various concrete hard standings and thick overgrowth.

#### *Amount of Development*

Based on the site area of 0.29 ha, it is considered that the site could support at least 15 homes at a density of 52 dph.

#### *Planning Policy*

The site was identified in the Local Plan as a potential housing site for consideration in the Neighbourhood Plan.

#### *SHLAA Status*

Identified by the 2013 SHLAA (ref. T822) for 15 homes. The 2008 SHLAA had inappropriately identified the site in conjunction with the adjacent allotments to give a total site area of 1.88 ha.

#### *Opportunities*

There do not appear to be any policy or topographical constraints on the site which would restrict residential development. However, the adjacent Battery Gardens, which has a Scheduled Ancient Monument, would need to be considered in any development proposals. The site is also relatively central with regard to local services and facilities within Brixham.



*Constraints*

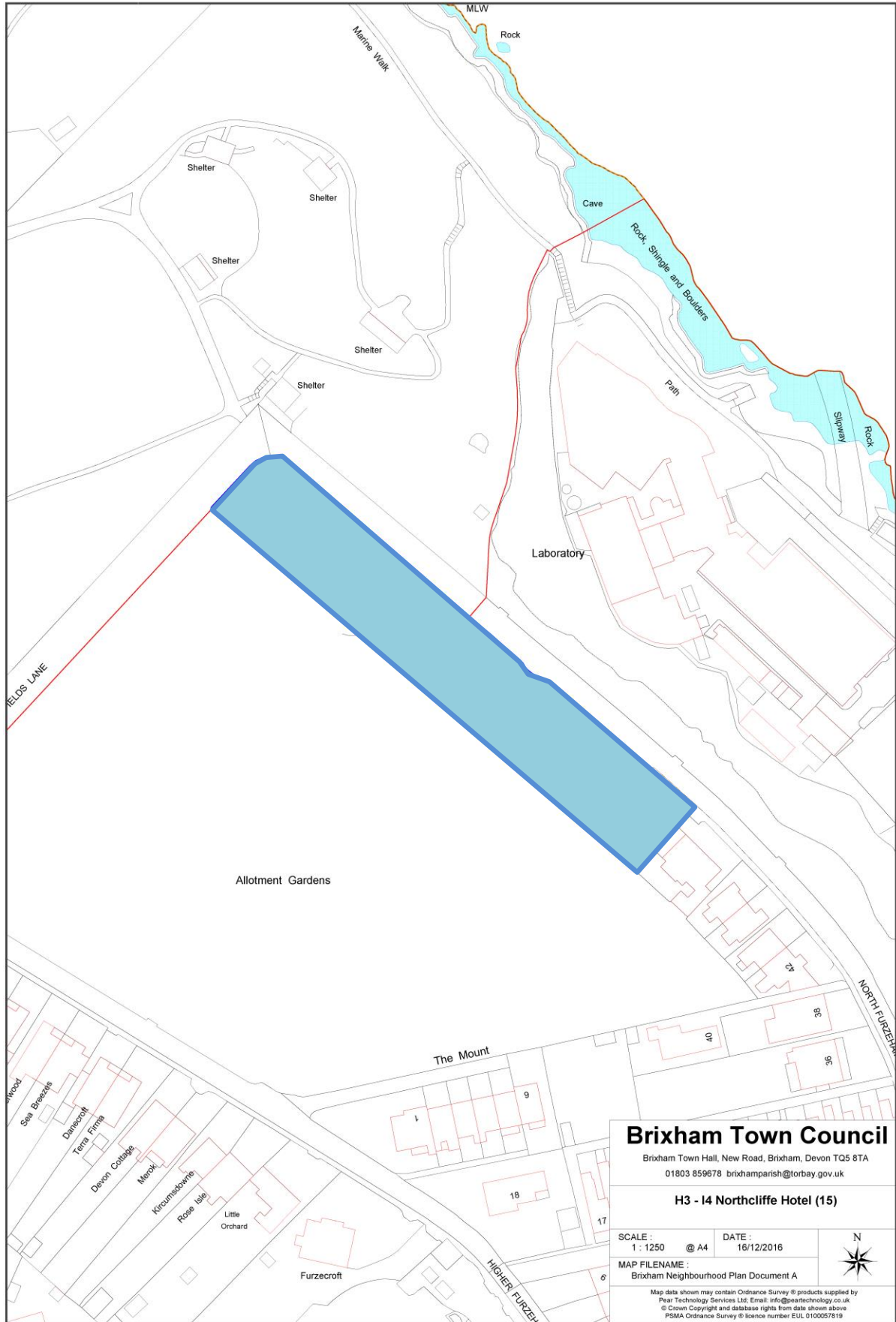
No specific constraints identified.

*Assessment Conclusions*

Site is suitable	Y
Site is available	Y
Site is achievable	Y

*Conclusions*

The site enjoys spectacular views over the Bay and is considered suitable, achievable and viable. It is believed that plans for its development are currently being considered by the landowner. It is appropriate for allocation in the Neighbourhood Plan.



### **H3 – I5: Torbay Trading Estate (Paint Factory)**

#### *Address*

Torbay Trading Estate, New Road, Brixham

#### *Site Area*

0.32 ha

#### *Description*

The site lies toward the north-western boundary of the Torbay Trading Estate. It has previously been developed as a Paint Factory which is now demolished. The site is currently a private car park.

#### *Amount of Development*

Based on the site area of 0.32 ha, it is considered that the site could support up to 15 residential units at a density of 47 dph.

#### *Planning Policy*

The site was identified in the Local Plan as a potential site for consideration in the Neighbourhood Plan. The Neighbourhood Plan is allocating land for employment use beyond the predicted requirement level, and this site is suited to residential use as determined in the SHLAA. It is within the settlement boundary and a brownfield site.

#### *SHLAA Status*

Identified by the SHLAA (ref. T791) for 15 residential units to be delivered within years 0–5.

#### *Opportunities*

The site is located in close proximity to the Town Centre and is previously developed land. There is good access to local amenities and employment. It is considered that the site remains suitable for residential development in the future possibly as a high-use mixed development. Several schemes have been proposed for this site in the past although none have progressed to date.

*Constraints*

The previous location of the Paint Factory on the site means that some remediation of the site will be necessary.

*Assessment Conclusions*

Site is suitable	Y
Site is available	Y
Site is achievable	Y

*Conclusions*

The site is suitable and viable and it is understood that plans for its development are currently being considered by the landowner. It is appropriate as an allocation in the Neighbourhood Plan.



### **H3 – I6: Oxen Cove and Freshwater Car Parks**

#### *Address*

Oxen Cove and Freshwater Car Parks, Brixham

#### *Site Area*

0.5 ha of which only part is proposed for development.

#### *Description*

Two brownfield sites located on land on the southern edge of the outer harbour. The sites are currently car parks.

#### *Amount of Development*

The sites could provide 10 dwellings on the outskirts of Brixham at a density of 40 dph.

#### *Planning Policy*

The site was identified in the Local Plan for employment use. The Neighbourhood Plan is allocating land for employment use beyond the predicted requirement level, and this site is suited to some residential use – in line with the SHLAA - to enable the employment development to come forward. It is within the settlement boundary and a brownfield site.

It is also within the Conservation area so heritage issues will need to be addressed as set out in Policy J7 and Policy BE1

#### *SHLAA Status*

Identified by the SHLAA (ref. HC245 and T858) for 100 dwellings.

The sites were however excluded from the Local Plan for the following reasons:

*The two sites are located on brownfield land within the urban area and are fairly accessible. Both sites are within the GHB [Greater Horseshoe Bat] sustenance zone and adjacent to the Battery Ground OSWI [Other Site of*

Wildlife Interest]. *They are also located within a flood risk area. The sites are also the best sites in Torbay for marine related employment (see Policies TO3 and C2 and supporting text of the Submission Local Plan) and there is significant interest in use of the sites for that purpose. The sites also provide much used and important parking for visitors to Brixham. A funding bid, currently with the HoSW LEP [Heart of the South West Local Enterprise Partnership] (under Growth Deal 2), could unlock the site for employment use by allowing some relocation of car and coach park.*

### *Opportunities*

The sites could provide 100 dwellings relatively close to the centre of Brixham.

### *Constraints*

As noted in the reasons for the exclusion of the site from the Local Plan, the site suffers from a number of constraints.

Both sites are within the Greater Horseshoe Bat sustenance zone and are adjacent to the Battery Ground OSWI. They are also located within a (*coastal*) flood risk area. Vehicular access to both sites is via Blackball Lane which is single track at a pinch point by Dalverton Flats.

The sites are also the best sites in Torbay for marine-related employment (see Policies TO3 and C2 and supporting text of the Submission Local Plan) and there is significant interest in use of the sites for that purpose. The sites also provide much used and important parking for visitors to Brixham. A funding bid, currently with the HoSW LEP (under Growth Deal 2), could unlock the site for employment use by allowing some relocation of car and coach parking.

However, a master planning exercise for these two sites has proposed that part of the development for Freshwater Quarry should be a multi-storey car park to retain significant parking capacity on the sites. As part of the enabling of this particular development, it is proposed that 10 homes are incorporated into the sides of the car



park. Consequently, the sites are considered appropriate for a limited amount of housing development for the purpose of enabling a development of the site as a whole.

*Assessment Conclusions*

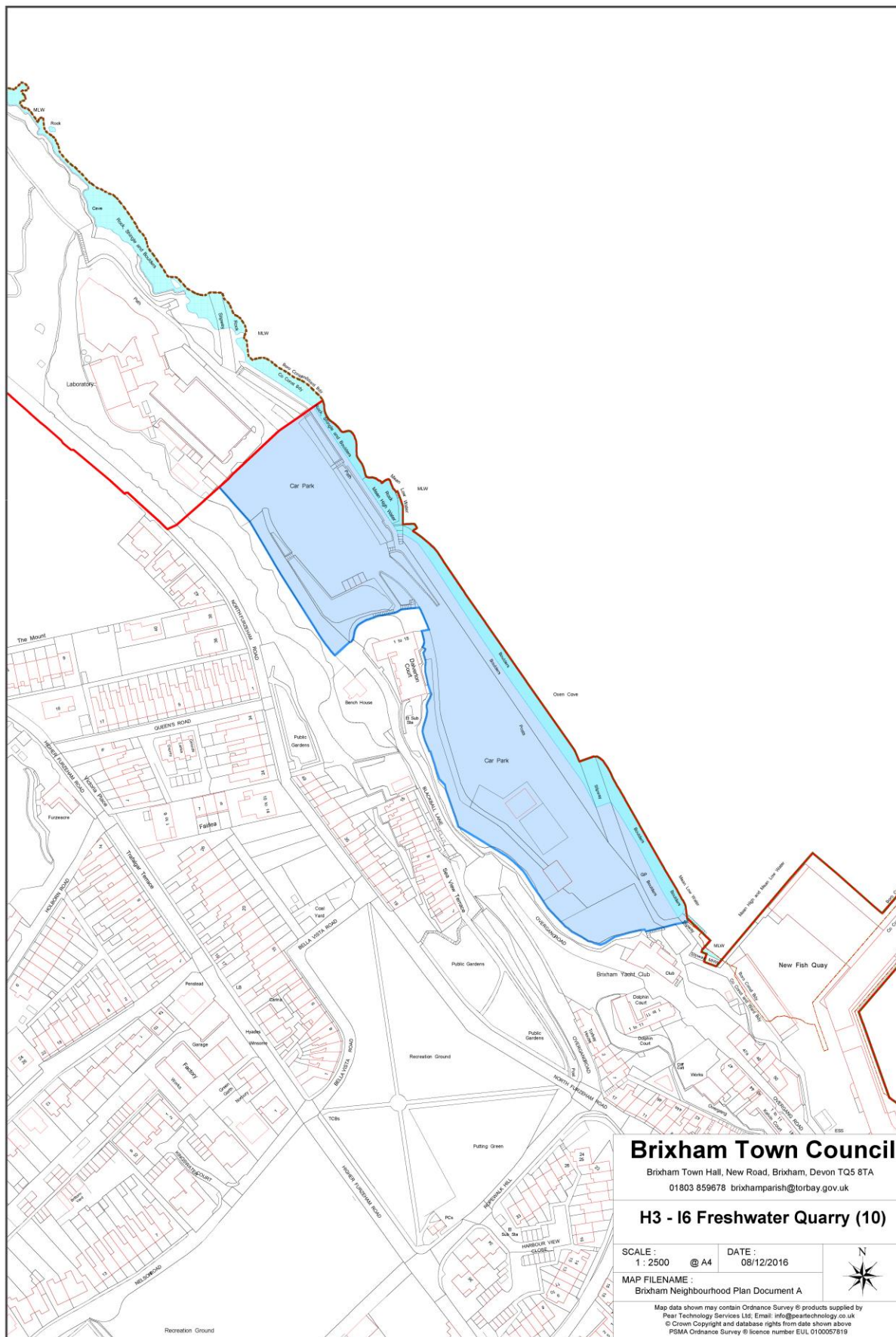
Site is suitable	Y
Site is available	Y
Site is achievable	Y

The site is considered achievable for a very limited amount of housing, the remainder being reserved for employment development.

*Conclusions*

The site (Freshwater Quarry) is suitable for the development of a limited number of homes (10) and this number is considered to be appropriate for allocation in the Neighbourhood Plan.





### **H3 – I7: Brixham Police Station**

*Address*

Brixham Police Station, Rea Barn Close, Brixham

*Site Area*

0.15 ha

*Description*

The site sits at the top of Rea Barn Road and is a police station of relatively modern design.

*Amount of Development*

Based on the site area of 0.15 ha, it is considered that the site could support at least 7 residential units at a density of approximately 45 dph.

*Planning Policy*

The site is within the settlement boundary and within a residential area.

*SHLAA Status*

Identified by the SHLAA (ref. 13168) for 12 residential units to be delivered within years 5–10.

*Opportunities*

The site is considered suitable for development because of the characteristics of the site and its surrounding area. It has been the subject of a pre-application but this was withdrawn.

However, the site is currently being run as a functioning police station and is on the retained list. Nevertheless, there is a potential that it could become available in the next few years if the police station is combined with the fire station.

*Constraints*

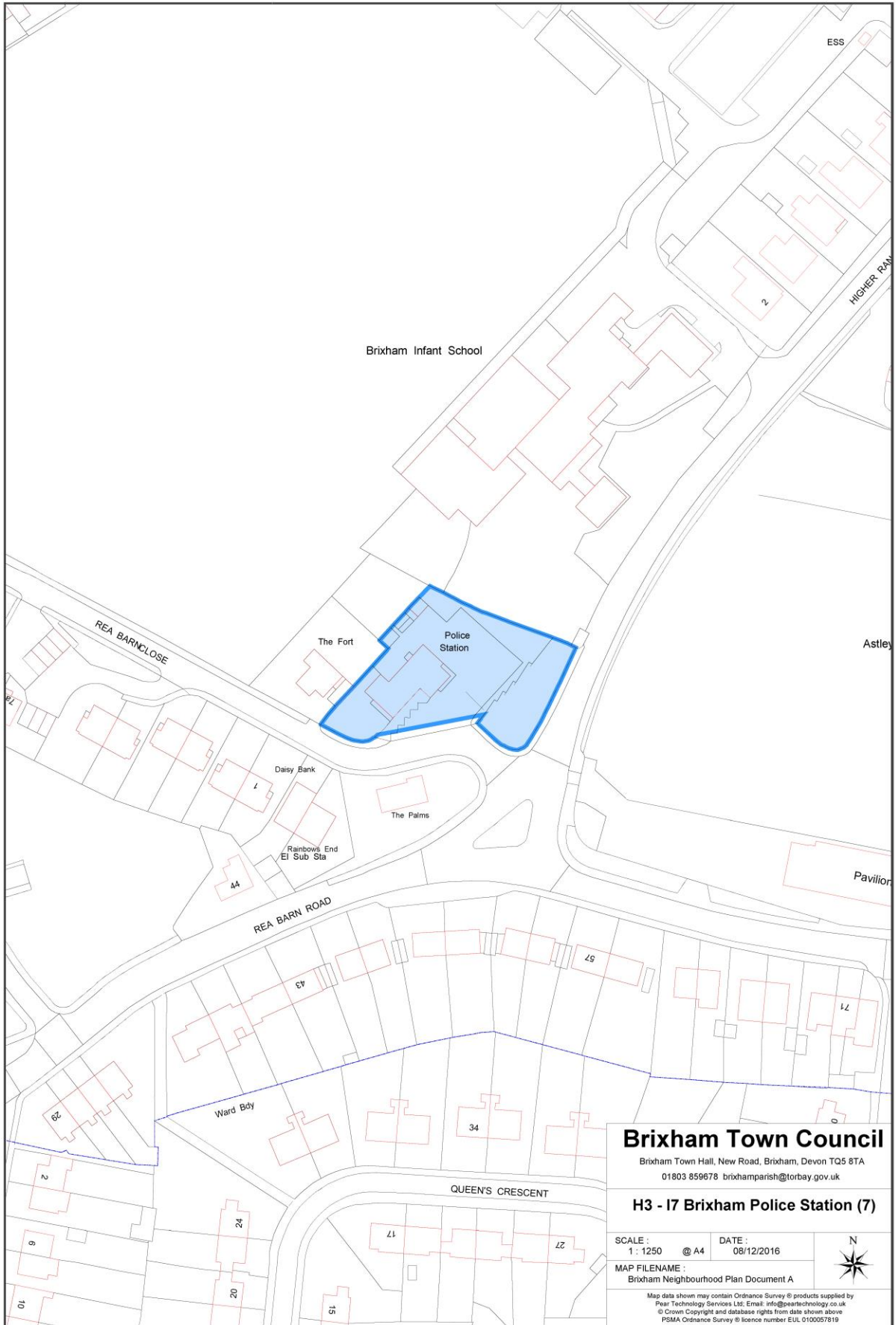
None

*Assessment Conclusions*

Site is suitable	Y
Site is available	Y (assumes the site may become available in the future)
Site is achievable	Y

*Conclusions*

The site is not currently deliverable as it is still a functioning police station but there is a potential that it could become available. It is therefore considered appropriate for allocation in this Neighbourhood Plan.



### **H3 – I8: Former Jewson**

#### *Address*

12/12A Torbay Trading Estate, Brixham

#### *Site Area*

0.1 ha (estimated)

#### *Description*

The detached industrial building fronts the main road and has forecourt car parking. The main section is of two-storey construction with two, single-storey bays to the rear. The site was previously used as the main Brixham branch of the national builder's merchants Jewson until their relocation to purpose designed premises elsewhere in the town. The building has been re-let but its future is unclear.

#### *Amount of Development*

There is a proposal as received in the Regulation 14 consultation from an experienced local affordable housing developer stating his interest in developing the site for 20 small affordable homes. This is a high site density. However, the specialist local knowledge of the developer is acknowledged as is the pressing need for affordable housing within the town. On this basis it is considered to allocate the site for 20 smaller affordable homes.

The affordable housing need in the Bay has been outlined in Torbay Council's Housing and Health Needs Assessment (November 2015) which states: "Affordable housing is an issue in Torbay with an undersupply of social housing and relatively expensive property prices. There is a large waiting list for social housing. There is a pressing need for affordable housing in Torbay to meet the needs of local people who are unable to afford open market house prices or rents."

#### *Planning Policy*

The site has been used for industrial purposes and it would need change of use to residential. Neighbourhood Plan policy J1 at para J1.2 states "In the event of a lack of viability being established... a change of use will be supported where the alternative use

will contribute to the needs of the community by addressing an identified Brixham Peninsula need for affordable housing in accordance with the definition in the NPPF”.

*SHLAA Status*

Not identified in the SHLAA.

*Opportunities*

The site provides a real opportunity for a number of affordable homes for the young people of the town located at a short distance from the town centre.

*Constraints*

No specific constraints identified.

*Assessment Conclusions*

Site is suitable	Y
Site is available	Y
Site is achievable	Y

*Conclusions*

The site is suitable and achievable and it is believed that development of this site would be of great benefit to the town in providing a number of affordable homes for young people. It is determined that the site will be available during the period of the Neighbourhood Plan. It is appropriate as an allocation in the Neighbourhood Plan.





### **H3 – I9: Castor Road**

#### *Address*

Land Rear of 16–26 Castor Road, Brixham

#### *Site Area*

0.28 ha

#### *Description*

The site is an enclosed parcel of open land behind residential dwellings. There are some disused derelict buildings to one side.

#### *Amount of Development*

There is a planning application for a development of 10 homes which was refused by the Local Planning Authority and is now the subject of an appeal (see below). It is possible that the appeal will be allowed. If not, it appears possible that an alternative scheme could come forward which addressed the grounds of the refusal by developing the same number of homes but reducing their size (by for example substituting the semi-detached houses currently proposed for smaller flats). On this basis it is considered appropriate to allocate the site for 10 homes.

#### *Planning Policy*

The site has been the subject of a number of refused planning applications in the past (P/2004/0319, P/2003/2030, and P/2001/0506) certain of which were the subject of unsuccessful appeals (APP/X1165/A/04/1143574 and APP/X1165/A/02/1087155). The most recent application, P/2016/0947, was also refused. The grounds for the refusal were over development, insufficient off-street parking provision and lack of information related to flood risk in a Critical Drainage Area. We are informed the applicants are in the process of appealing this decision.

#### *SHLAA Status*

Not identified in the SHLAA.



*Opportunities*

The site is an opportunity for development and could provide up to 10 residential units.

*Constraints*

The site is within a Critical Drainage Area as designated by the Environment Agency.

*Assessment Conclusions*

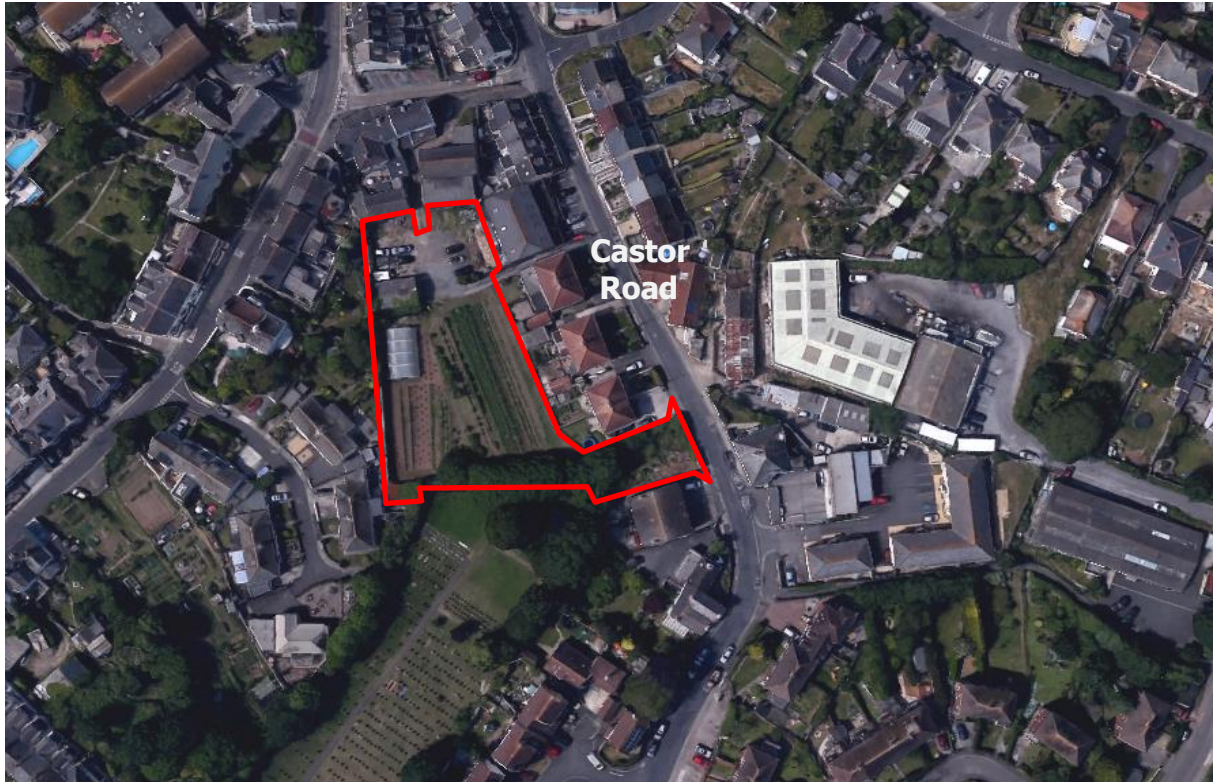
Site is suitable        Y     (assuming resolution of issues relating to historical refusals)

Site is available     Y

Site is achievable    Y

*Conclusions*

The site is appropriate for allocation in the Neighbourhood Plan.



### **H3 – I10: Waterside Quarry**

#### *Address*

Land at Waterside Quarry, Waterside Road

#### *Site Area*

0.79 ha

#### *Description*

The site forms part of a former quarry and, based on the definition in the NPPF and Planning Policy Statement 3, is determined to be previously developed land. An adjacent part (0.28 ha) has already been granted planning consent for 3 dwellings and these have been already been counted as windfalls according to Torbay Council and so are not allocated.

#### *Amount of Development*

Given the site area of 0.79 ha it is considered that the site could support at least 10 homes at the low density of 12.6 per hectare. This density was suggested by consultants working for the Forum on behalf of the Prince's Foundation in preference to higher densities in the SHLAA. AECOM later indicated the site has capacity for 18 homes.<sup>3</sup> However, the development of the adjacent windfall site to the north and an adjacent site to the south have both been for large detached dwellings. The minimum delivery assessment of 10 dwellings is consistent with such a development of the allocated site, so there appears no reason to change the assessment.

#### *Planning Policy*

The site is wholly within an Urban Landscape Protection Area (ULPA) (C5.46) in the adopted Local Plan and so landscaping will need to be considered in any development. Part of the site is also within a Regionally Important Geological Site (RIGS) and an OSWI and so geological and environmental aspects will need to be considered.

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<sup>3</sup> Note: The AECOM assessment of Waterside Quarry (H3 – I10) uses a site area of 0.9 ha. The figure of 18 is a pro-rata adjustment of their figure of 21 given an allocated site area of 0.79 ha.

### *SHLAA Status*

Waterside Quarry as a whole (1.07 ha) was identified in the 2008 SHLAA for 42 homes at a density of 39 per hectare and subsequently identified for disposal by the Torbay Council as a "*Major commercial residential development*" (asset reference P0033 in cabinet report 123/2008). The site was subsequently sold at public auction in 2014 and the owners have expressed an interest in bringing the site forward.

### *Opportunities*

Referring to the Officer Report relating to the adjacent part of the site for full planning application P/2014/0045, it is considered that development could offer the "*opportunity to provide biodiversity and landscape enhancements through additional landscaping which would improve the appearance of the natural environment in the area*" and that "*suitably designed and scaled properties ... would result in the dwellings having an acceptable impact on ULPA with the potential for the landscaping mitigating to improve the landscape character of the area*". This fits with the survey by RT Taylor which formed the evidence for original designation of the site as a RIGS and which noted that removing vegetation from the quarry wall face would be advantageous. This could be achieved through a development.

### *Constraints*

As set out above, landscaping, geological and environmental aspects will need to be considered.

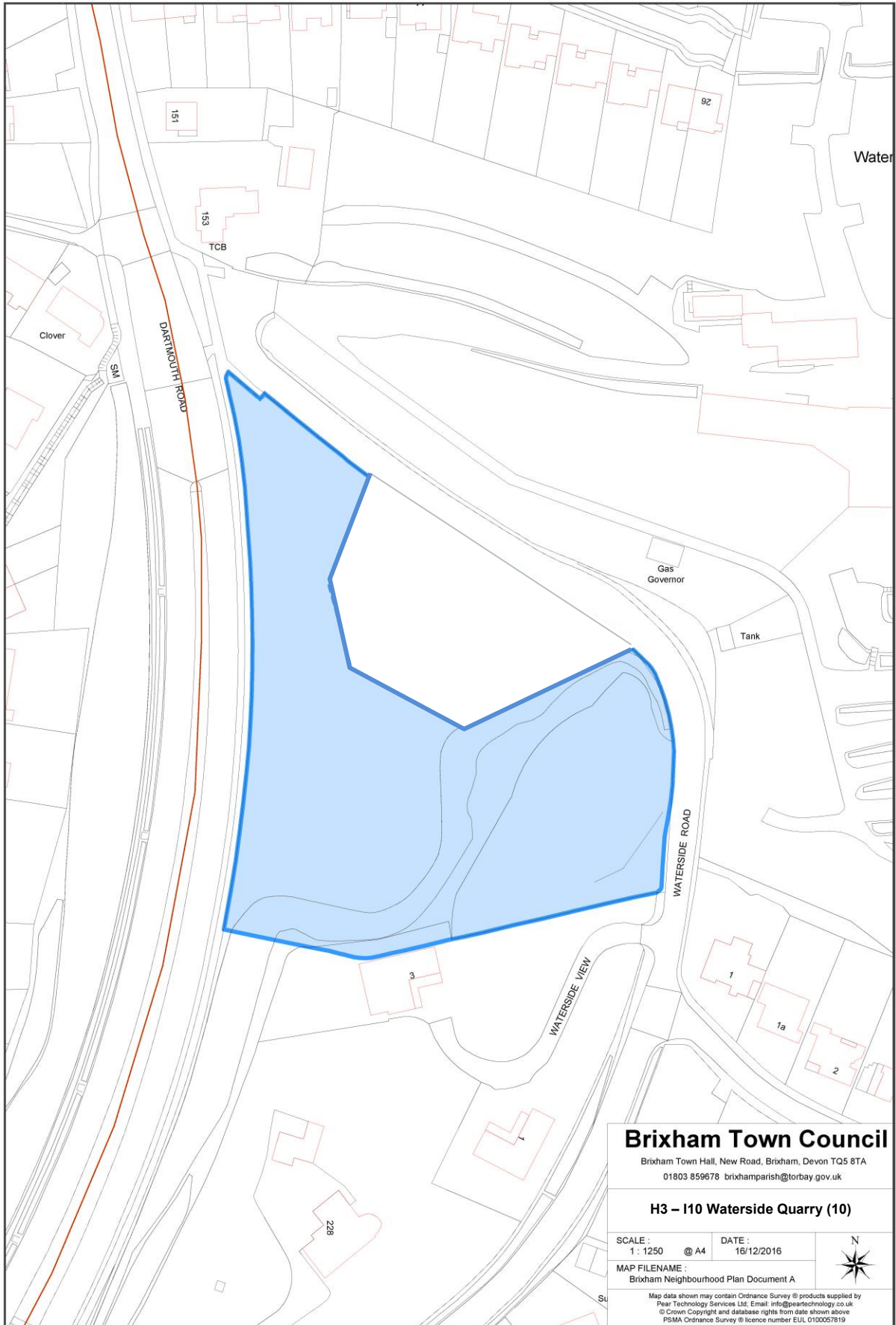
### *Assessment Conclusions*

Site is suitable	Y
Site is available	Y
Site is achievable	Y

### *Conclusions*

The site is in an accessible location near to local amenities and a main bus route, and has access off both Dartmouth Road and Waterside Road. Plots of land adjacent to this site have recently been successfully developed in a contemporary marine architectural

style. This site is considered suitable, available and achievable and proposals should employ a similar high-quality contemporary design solution. It is appropriate as an allocation in the Neighbourhood Plan.





### **H3 – I11: Knapman's Yard**

#### *Address*

Stoke Gabriel Road, Galmpton

#### *Site Area*

0.14 ha

#### *Description*

Previously developed industrial land currently used as a store and compound for "RJ Knapman and Sons Limited" builders.

#### *Amount of Development*

Based on the site area of 0.14 ha it is considered that the site could support 6 homes at a density of 42 per hectare. This density was suggested by consultants working for the Forum on behalf of the Prince's Foundation in preference to higher densities in the SHLAA. However, the centre of Galmpton may equally be suited to higher density development in keeping with the historic built form.

#### *Planning Policy*

The site lies almost centrally within the Galmpton Conservation Area.

#### *SHLAA Status*

Identified by the SHLAA 8 dwellings at an assumed density of 57 dph.

#### *Opportunities*

Well situated in a village centre location close to schools and shops with access off Stoke Gabriel Road. Residential development at this location could add to the sustainability of the village and would fit more appropriately with the location than the current industrial use. The site will need a design solution which responds to the Conservation Area and the defined character type of Stoke Gabriel Road. It is also likely that better access arrangements than present (visibility splays, gradients, etc.) can be achieved.

*Constraints*

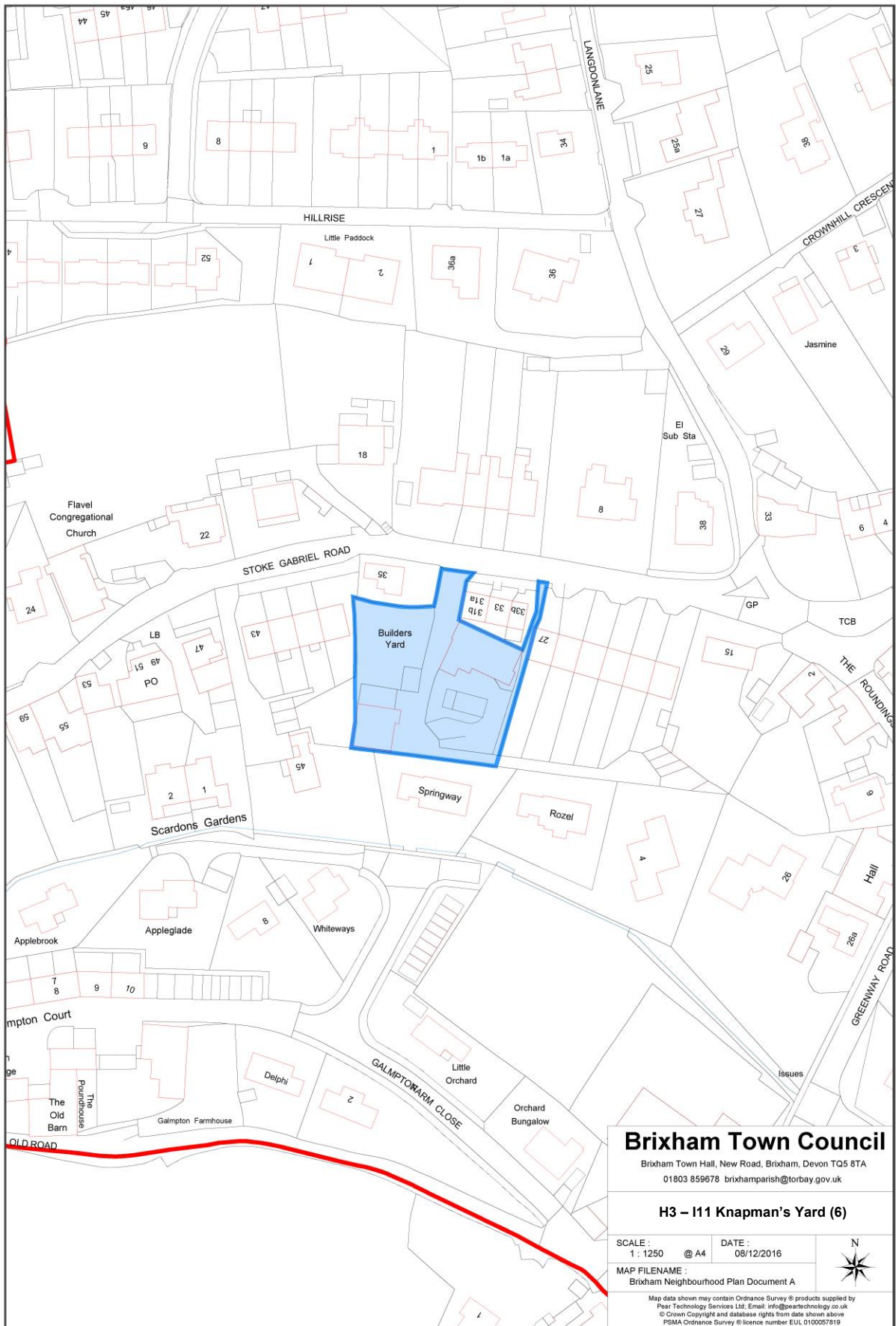
No obvious constraints. However, it is noted that ground contamination may need to be considered through any planning process given the previous use classification. Given historical flooding issues in Galmpton Village, any proposal will also need to ensure there is no adverse impact.

*Assessment Conclusions*

Site is suitable	Y
Site is available	Y
Site is achievable	Y

*Conclusions*

This site is suitable for inclusion in the Plan and its availability has been confirmed by the owners. It is appropriate as an allocation in the Neighbourhood Plan.



## 8 Rejected sites

8.0.1 Rejected sites are summarised in Table 4. In the pages which follow there are full individual site by site assessments including detailed maps of each rejected site.

*Table 4: Rejected sites.*

<b>Neighbourhood Plan Reference</b>	<b>Local Plan Reference</b>	<b>Site Name</b>
<b>Brixham Town</b>		
H3 – R1	LP excluded site	Wall Park Extensions
H3 – R2	LP excluded site	Berry Head Road
H3 – R3	LP excluded site	Upton Manor Farm Campsite
H3 – R4	LP excluded site	Shoalstone Overflow Car Park
H3 – R5	BPNPH9	Kings Barton <sup>1</sup>
H3 – R6	BPNPH10	Beverley Court <sup>1</sup>
<b>Churston, Galampton and Broadsands</b>		
H3 – R7	LP excluded site	White Rock Extensions
H3 – R8	BPNPH2	Churston Golf Club
H3 – R9		Brokenbury
H3 – R10		Field adjacent Greenway Road/ Greenway Park
H3 – R11	–	Pilgrim Friend land at Churston aka Archery Field
H3 – R12	LP excluded site	The Piggery
H3 – R13	LP excluded site	Land adjacent Ferrers Green
H3 – R14	LP excluded site	Mathill Road <sup>2</sup>
H3 – R15	LP excluded site	Copythorne Road <sup>2</sup>

LP: Local Plan

<sup>1</sup> Kings Barton and Beverley Court have been rejected based on availability and viability grounds only, as they do not appear to be available and their development does not appear viable given the land values generated by the highly desirable detached properties in good order currently present there.

<sup>2</sup> Whilst Mathill Road and Copythorne Road are both technically in Churston, they abut the developed settlement boundary of Brixham, and as a result any development is most likely to effect Brixham more than Churston.

### **H3 – R1 and H3 – R2: Wall Park Extensions and Berry Head Road**

#### *Address*

Fields adjacent to the former holiday park at Wall Park; and  
Land off Berry Head Road, Berry Head, Brixham

#### *Site Area*

Approx. 15 ha

#### *Description*

These two greenfield sites are identified on the map overleaf. Together they include all of the undeveloped greenfield land surrounding the committed site H3 – C1 described above. The Wall Park Extensions site includes site all of the land included in 2013 SHLAA sites T700, T712 and 13233 which is not already allocated in this Neighbourhood Plan as committed site H3 – C1. The Berry Head Road site is the same as 2013 SHLAA site T703.

#### *Amount of Development*

The sites could provide 100 dwellings on the outskirts of Brixham

#### *Planning Policy*

The sites lie wholly within the AONB and also lie in the Countryside Area. The sites are very sensitive locations for Greater Horseshoe Bat flight paths and sustenance zones.

#### *SHLAA Status*

Identified by the SHLAA (ref. T703 and T712 13233) for 100 dwellings.

The sites were, however, excluded from the Local Plan for the following reasons:

*The site is adjacent to the main Wall Park site, where the Council has resolved to grant planning permission (subject to completion of a S106 Agreement) for 165 dwellings.*



*The site is within South Devon AONB, it forms an important buffer between edge of Brixham and the NNR [National Nature Reserve]. Most of the site is within Berry Head Farm OSWI. It is also within GHB sustenance zone and most of the site is within the tracked bat flyway. Redevelopment of the site could increase recreational pressure on the South Hams SAC. The site is within South Devon AONB. The landscape of the site is highly sensitive to change. The site also lies on an area of Brixham Limestone that forms part of the New Local Plan Mineral Safeguarding Area. The Council has recently resolved to grant planning permission for development of the former holiday park at Wall Park, which followed extensive negotiation with the applicants and environment organisations to secure a proposal that carefully balances development with environmental sensitivities. Further development, of "Wall Park extension" sites would represent development beyond the environmental capacity of the highly sensitive area.*

### *Opportunities*

The sites could provide 100 dwellings on the outskirts of Brixham.

### *Constraints*

As noted in the reasons for the exclusion of the three sites from the Local Plan, they suffer from a number of severe constraints.

The sites are greenfield and are highly sensitive landscapes due to their location within the AONB, their prominent coastal position, overlaying designations and visual prominence. No exceptional circumstances have been put forward for their development.

Additionally, the sites are within the Greater Horseshoe Bat sustenance zone and *most of the sites* are within the tracked bat flyway.

The sites form an important buffer between edge of Brixham and the NNR and one of the sites (**Berry Head Road T703**) is within the Berry Head Farm OSWI.

Redevelopment of the sites would increase recreational pressure on the South Hams SAC. Further, the landscape of the sites is highly sensitive to change and they also lie on an area of Brixham Limestone that forms part of the New Local Plan Mineral Safeguarding Area.

Given the number of constraints above, the sites would represent development beyond the environmental capacity of the highly sensitive area and have been excluded from the Neighbourhood and Local Plans.

### **Specific Note concerning the Berry Head Road site (T703)**

This site was recently the subject of a planning application P/2015/1092 for the formation of 8 holiday chalets and a reception/pool building. Prior to the proposal being withdrawn, it was subject to letters of objection from both Natural England and South Devon AONB. In a letter to Carly Perkins (Torbay Council planning officer) dated 7 January 2016, Julien Sclater of Natural England objects to the proposed development on the grounds of both South Hams SAC and Landscape. In a letter to Carly Perkins dated 12 January 2016, Robin Toogood of South Devon AONB states "*...The current application, although not large in extent, nevertheless represents a further unacceptable incursion into the undeveloped AONB landscape in a particularly sensitive locality, and is objectionable for that reason....*"

Both letters are available in the documents section for application P/2015/1092 on Torbay's online planning portal.

The site was also considered in a Landscape Consultation Response by Enderby Associates as part of planning application P/2015/1092. This concluded, "*proposals are likely to give rise to significant harm to the landscape character and visual amenity of this part of the AONB, within an area identified as being highly sensitive to change and subject to particular pressure*".

*Assessment Conclusions*

Site is suitable	N
Site is available	Y
Site is achievable	N

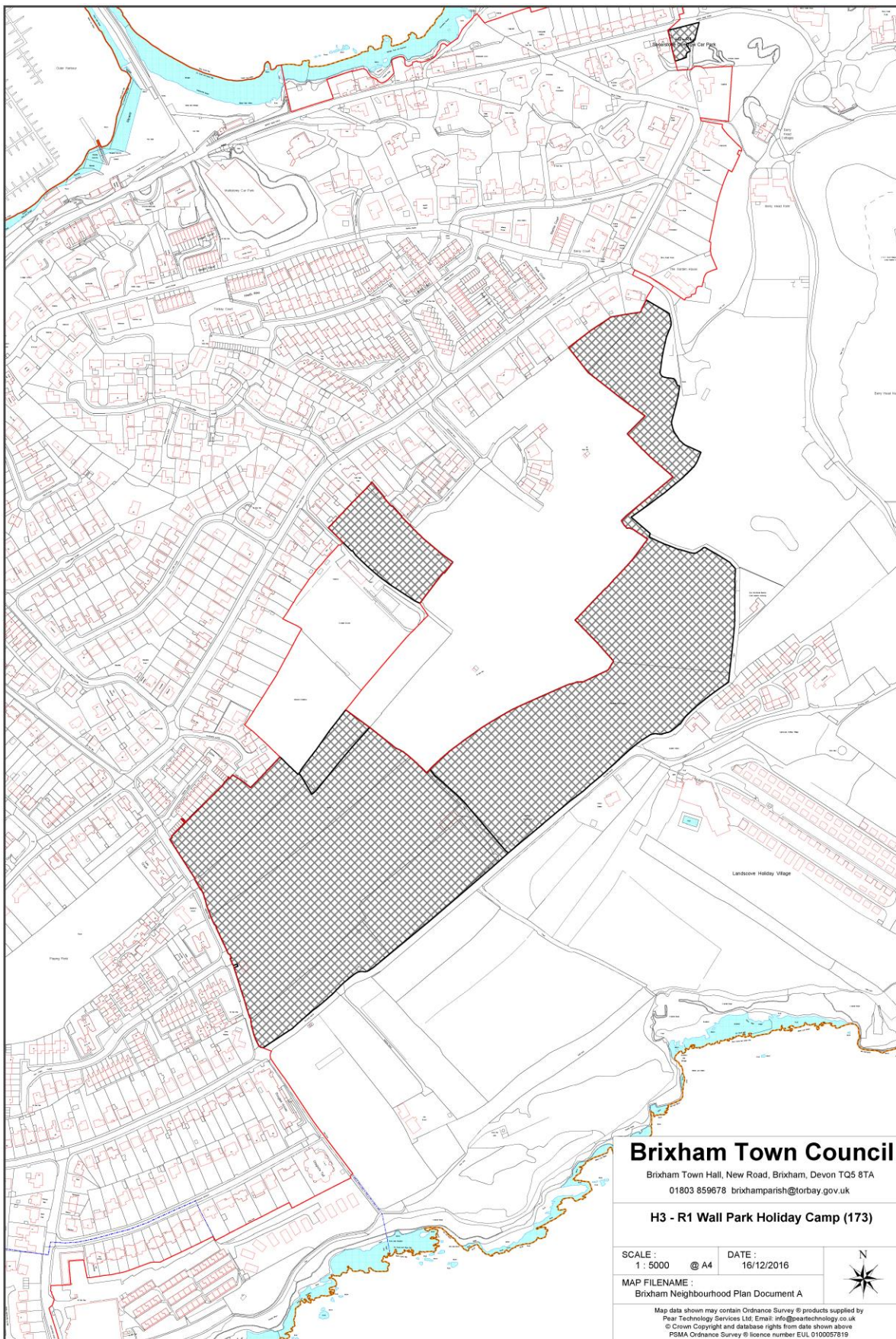
The sites are not considered achievable as they are unsuitable for development because of severe landscape and environmental constraints.

*Conclusions*

Development is likely to give rise to significant harm to the landscape character and visual amenity of this part of the AONB, within an area identified as being highly sensitive to change and subject to particular pressure, as well as likely to cause significant impacts to protected species.

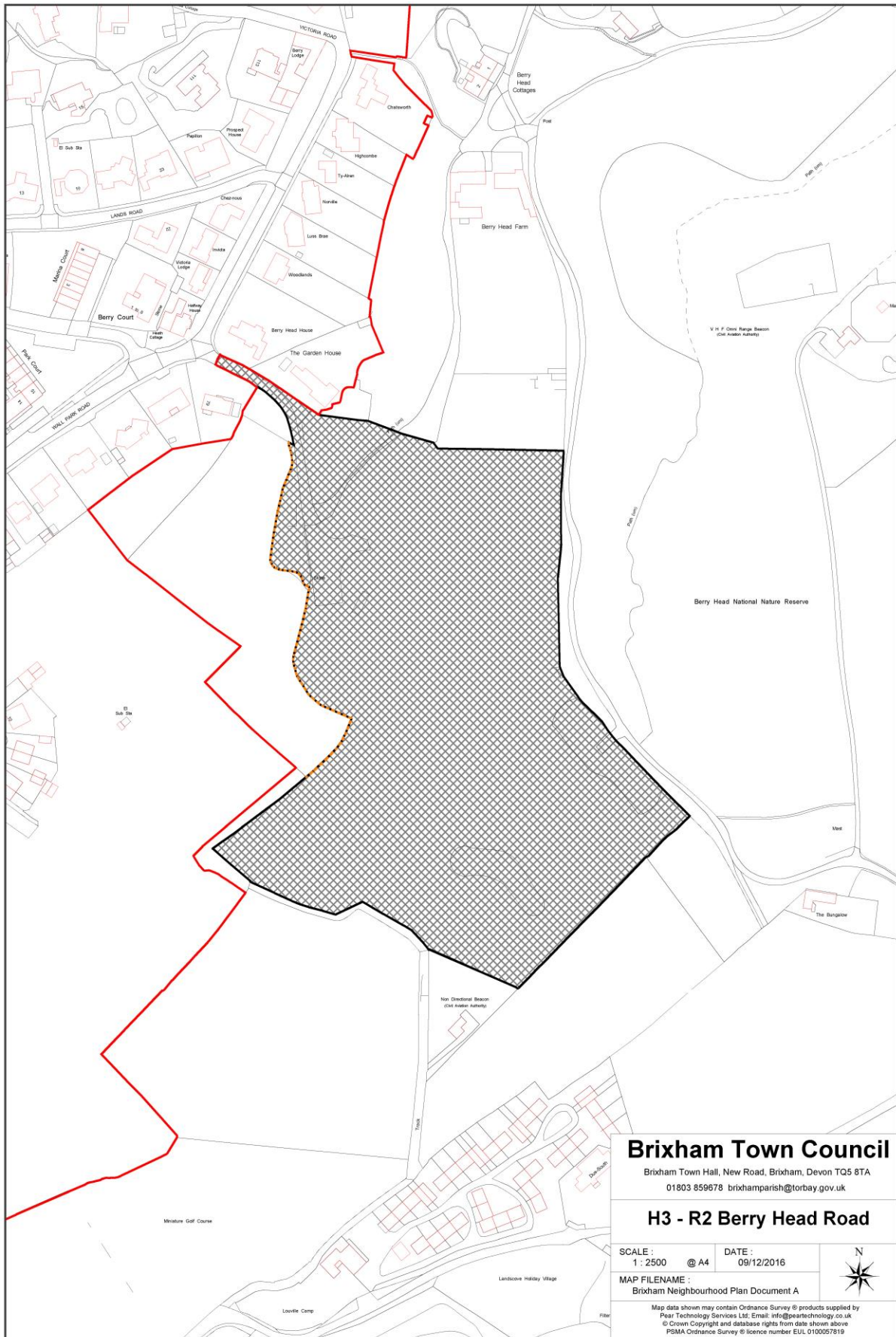
The sites are not deliverable because of the severe environmental constraints and are therefore not considered to be appropriate for allocation in the Neighbourhood Plan.

Following a suggestion that these sites be considered for protection by way of a Local Green Space designation by the Statutory Consultee Natural England, this Neighbourhood Plan has allocated these sites as Local Green Space within site E4 – 4.





# Housing Site Assessment





### **H3 – R3: Upton Manor Farm Campsite**

#### *Address*

Upton Manor Farm Campsite, St Mary's Road, Brixham

#### *Site Area*

2.7 ha

#### *Description*

A greenfield site on the outskirts of Brixham which is currently run as a site for touring caravans and camping.

#### *Amount of Development*

Based on the site area of 2.7 ha, it is considered that the site could support at least 50 residential units at a density of 19 dph.

#### *Planning Policy*

The site lies wholly within the AONB and also lies in the Countryside Area. The site is also in a very sensitive location for Greater Horseshoe Bats as it is near a pinch point on their flight path.

#### *SHLAA Status*

The site was not considered in either the 2008 or 2013 SHLAA.

The site as a whole was excluded from the adopted Local Plan in document TC4 for the following reasons:

*Access to the site is restricted and is served by narrow roads with several sharp bends. The site lies in an area with multiple environmental constraints and is an environmentally sensitive site. It lies within South Devon AONB, GHB sustenance zone and flyways. However, whilst within the AONB, it could be considered as slightly separated from the main AONB rolling landscape. The site itself is not located in a surface water flood risk area.*

### *Opportunities*

n.a.

### *Constraints*

As noted in the reasons for the exclusion of the site from the Local Plan, the site suffers from a number of severe constraints.

However, the site has been proposed by the owners as a possibility for development and for inclusion in the Neighbourhood Plan. Bat surveys have been undertaken on their behalf by Blackdown Environmental and Savils has asked Blue Sky Ecology to complete a review of this ecological work undertaken in relation to a number of commercial buildings at Upton Manor Farm. Blue Sky Ecology has stated that "due to the site's proximity to Berry Head SSSI and the South Hams SAC any proposal will need to undergo a Habitat Regulations Assessment..." (See Appendix 1.) Blackdown Environmental has also established that greater horseshoe bats both fly over the site and along its periphery.

A proposal to develop the site (together with the industrial estate site) for housing in 1988 by the owners was refused and subjected to an appeal to the Planning Inspectorate and the Secretary of State. The ruling on the relevant part of the appeal (Part A) was dismissal on the grounds that it would be "seriously detrimental to the character of the Area of Outstanding Natural Beauty and the surrounding countryside in general." (See Appendix 1.)

The view of the Neighbourhood Forum is that the site lies entirely within South Devon AONB and no exceptional circumstances have been presented for its development.

The site is also within the sustenance and flyway zones of the Greater Horseshoe Bat and a screening exercise undertaken on behalf of Torbay Council has shown that an Appropriate Assessment would be required under the Habits Regulations if the site was to be developed. (This has also been confirmed in the Blue Sky Ecology report.) This Appropriate Assessment has not yet been completed and consequently the site cannot

be put forward for consideration as a potential site for inclusion in either the Neighbourhood or Local Plans.

Additionally, access to the site is restricted and is served by narrow roads with several sharp bends.

For these reasons, the site is considered not appropriate for development and has been excluded from the Neighbourhood Plan.

*Assessment Conclusions*

Site is suitable	N
Site is available	Y
Site is achievable	N

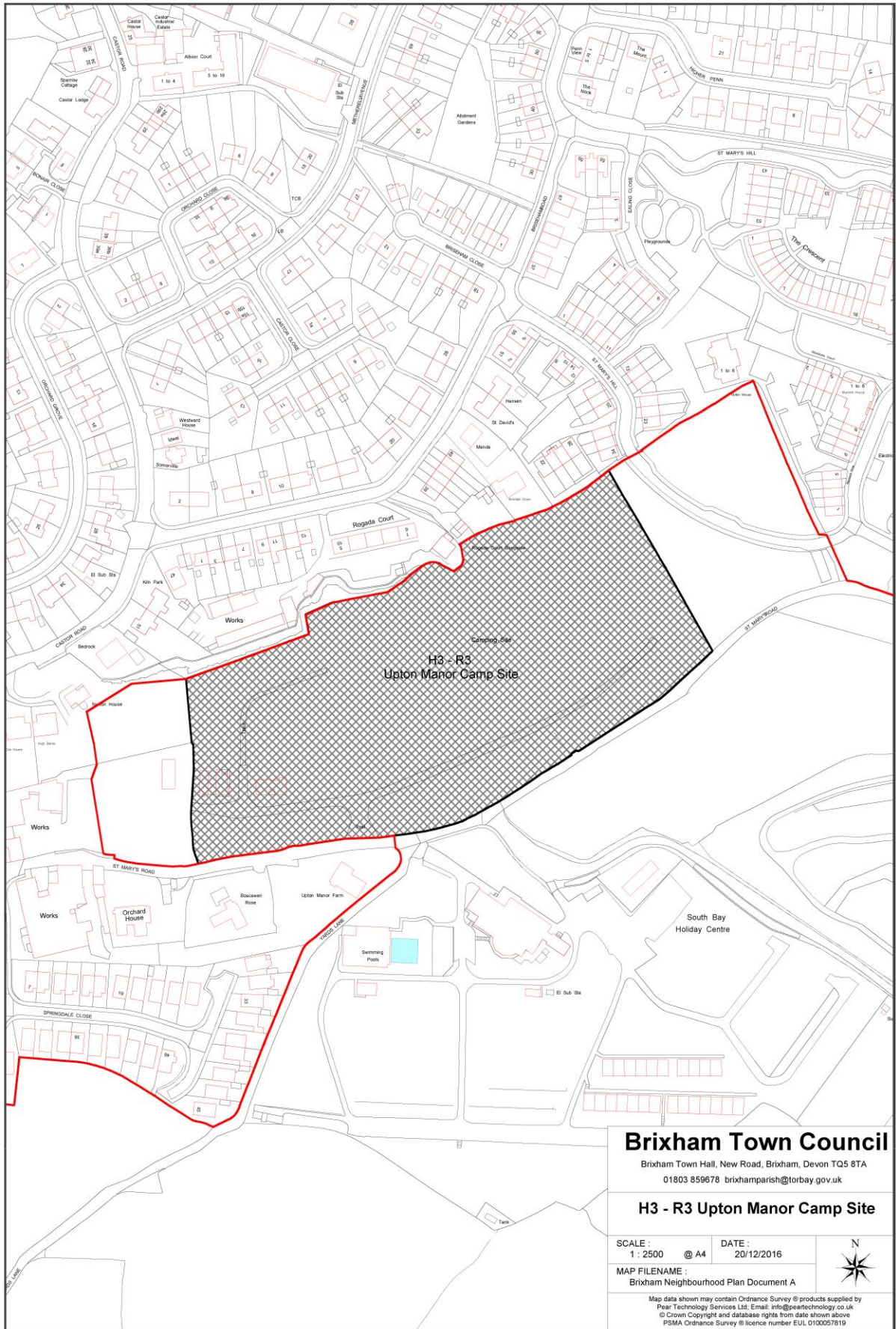
The site is not considered achievable owing to the severe environmental constraints to which it is subjected.

*Conclusions*

The site is not deliverable because of the severe landscape and environmental constraints and it is therefore not considered to be appropriate for allocation in the Neighbourhood Plan.

Further supplementary information on Upton Manor Farm Campsite is included in Appendix 1.

# Housing Site Assessment



## Brixham Town Council

Brixham Town Hall, New Road, Brixham, Devon TQ5 8TA  
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### H3 - R3 Upton Manor Camp Site

SCALE : 1 : 2500 @ A4 DATE : 20/12/2016

MAP FILENAME : Brixham Neighbourhood Plan Document A



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### **H3 – R4: Shoalstone Overflow Car Park**

#### *Address*

Shoalstone overflow car park, Berry Head Road

#### *Site Area*

0.07 ha

#### *Description*

The site is located within the urban area and acts as an overflow car park for the main Shoalstone Pool car park.

#### *Amount of Development*

Based on the site area of 0.07 ha, it is considered that the site could support at least 6 residential units.

#### *Planning Policy*

Adjacent land may be of ecological value – this site is located only 60 metres from Berry Head SAC.

#### *SHLAA Status*

Identified by the SHLAA (ref. T816) for 6 dwellings.

The site was, however, excluded from the Local Plan for the following reasons:

*The site is brownfield land within the urban area and is fairly accessible. However, it is within GHB sustenance zone and adjacent to Berry Head SAC and Berry Head Farm OSWI. The site is within flood risk area.*

#### *Opportunities*

The sites could provide 6 dwellings in the urban area of Brixham.



*Constraints*

As noted in the reasons for the exclusion of the site from the Local Plan, the site suffers from a number of constraints.

The site is within a Greater Horseshoe Bat sustenance zone and adjacent to South Hams SAC and Berry Head Farm OSWI. The site is within a flood risk area.

Consequently, the site is not considered appropriate for development and has been excluded from the Neighbourhood Plan.

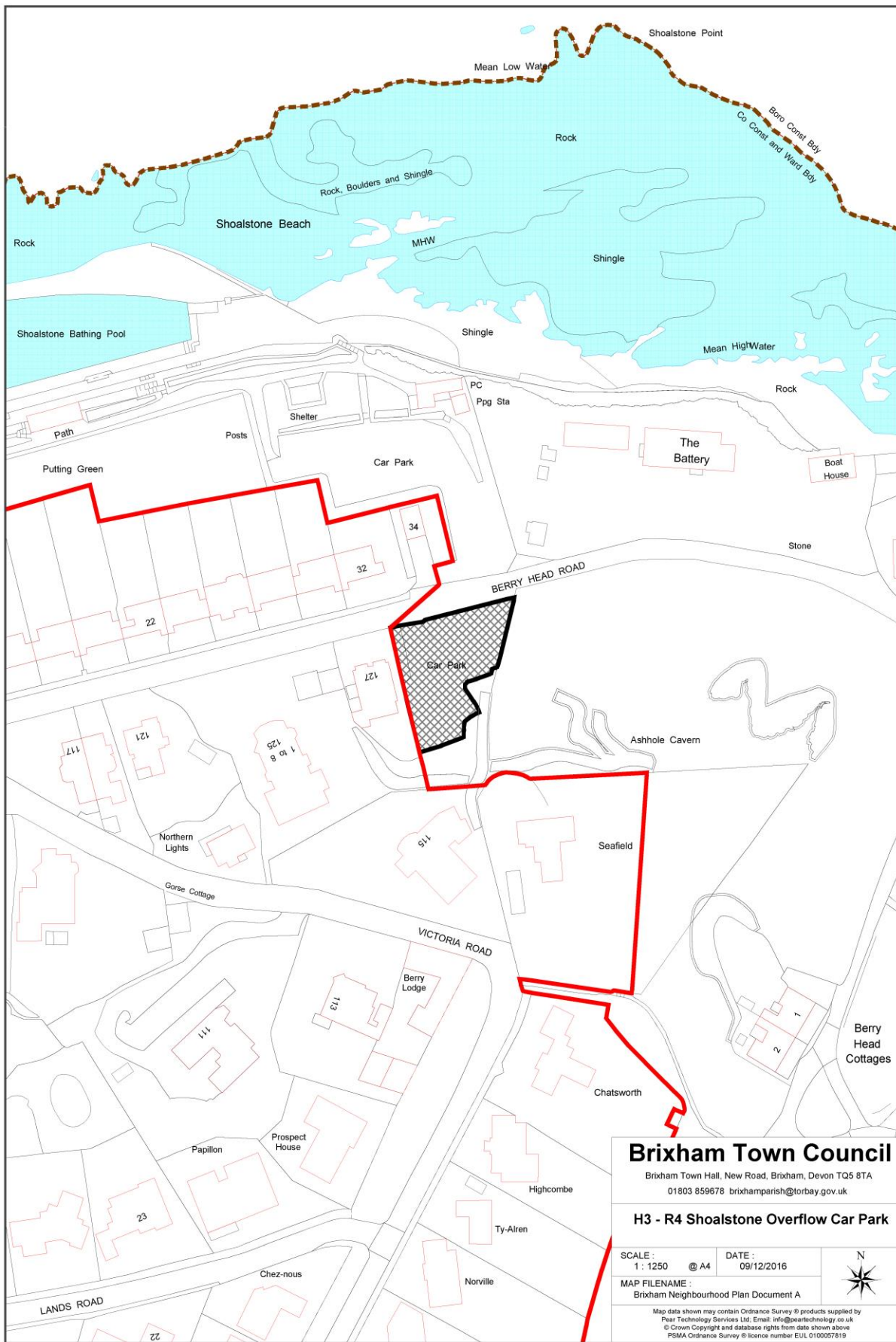
*Assessment Conclusions*

Site is suitable	N
Site is available	Y
Site is achievable	N

The site is not considered achievable as it is subject to a number of constraints.

*Conclusions*

The site is not deliverable because of the constraints and is therefore not considered to be appropriate for allocation in the Neighbourhood Plan.



### **H3 – R5: Kings Barton**

*Address*

Kings Barton, Summer Lane, Brixham

*Site Area*

0.20 ha

*Description*

The site is a large house in good order with extensive well landscaped grounds off Summer Lane in a residential area of Brixham.

*Amount of Development*

Based on the site area of 0.20 ha, it is considered that the site could support at least 7 residential units at a density of 35 dph.

*Planning Policy*

None

*SHLAA Status*

Identified by the SHLAA (ref. T886) for 7 residential units to be delivered within years 10–20 following a pre-application planning enquiry.

*Opportunities*

The site is considered suitable for housing development in principle because of the characteristics of the site and its surrounding area. The site is also within good proximity of local services within Brixham.

*Constraints*

The site is not considered commercially viable at present, and is not available.

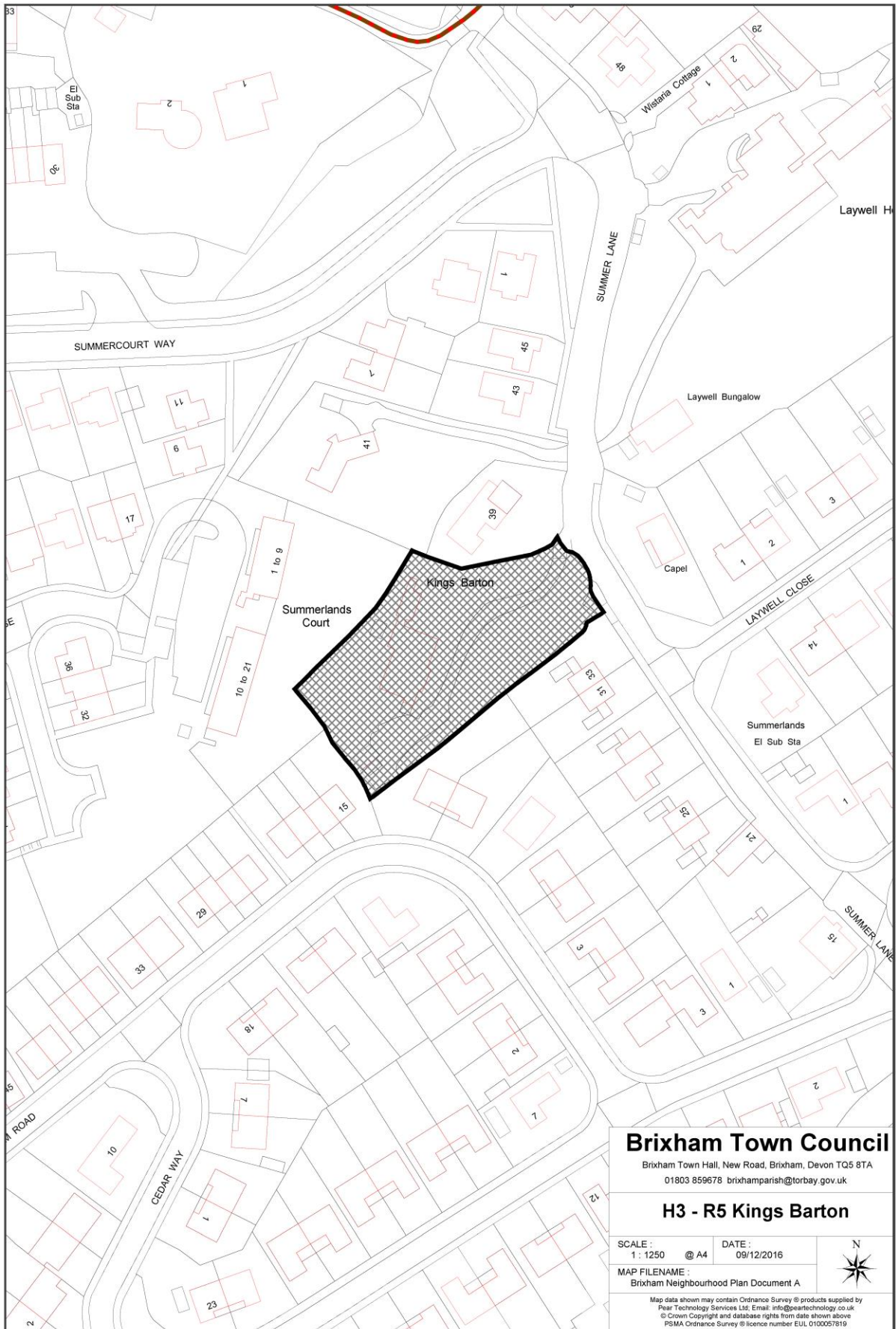
*Assessment Conclusions*

Site is suitable	Y
Site is available	N
Site is achievable	N

The site is not considered achievable as it is not considered to be commercially viable.

*Conclusions*

The site was previously a residential care facility before being converted back into a single home. It is understood from the seller's estate agents it was sold as a home to purchasers wanting to live there. Given its current use it is also doubtful that the site would be viable, given its present market value and the limited scope for development of such a small site. This site is not considered appropriate for identification in the Neighbourhood Plan.





### **H3 – R6: Beverly Court**

#### *Address*

Beverly Court, Upton Manor Road, Brixham

#### *Site Area*

0.20 ha

#### *Description*

The site is a large house in good order with extensive well landscaped grounds off Upton Manor Road in a residential area of Brixham.

#### *Amount of Development*

Based on the site area of 0.20 ha, it is considered that the site could support at least 9 residential units at a density of 45 dph.

#### *Planning Policy*

None

#### *SHLAA Status*

Identified by the SHLAA (ref. T894) for 9 residential units to be delivered within years 10–20.

#### *Opportunities*

The site is within a residential area of Brixham and as such offers a suitable location for development and would contribute to the creation of sustainable mixed communities. Existing access is off Upton Manor Road and is in proximity to local facilities and has good access to the Town Centre of Brixham.

However, the owners have made it clear that they do not wish to develop the site.

#### *Constraints*

The site is not considered commercially viable at present and is not available.

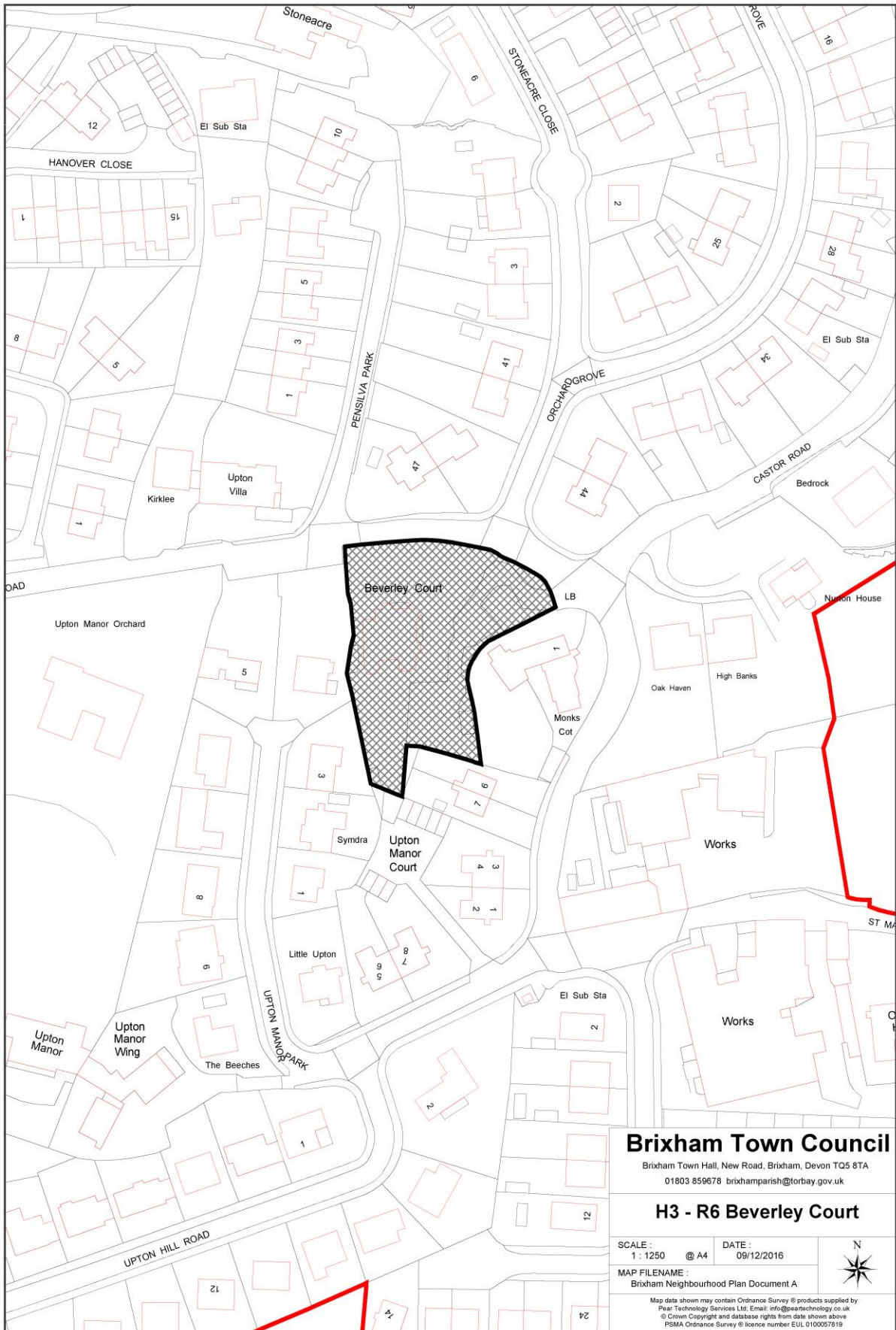
*Assessment Conclusions*

Site is suitable	Y
Site is available	N
Site is achievable	N

The site is not considered achievable as it is not available at this time for development.

*Conclusions*

The site was previously a residential care facility before being converted back into a single home. It is understood from the seller's estate agents it was sold as a home to purchasers wanting to live there. The forum has tried to contact the owners but understand they do not wish to bring the site forward for development. Given its current use it is unclear whether the site would be viable. This site is not considered appropriate for identification in the Neighbourhood Plan.



### **H3 – R7: White Rock Extensions**

#### *Address*

Brixham Road, White Rock

#### *Site Area*

82 ha

#### *Description*

A large tract of farmland comprising the best and most versatile agricultural land (grade 2 and 3a).

#### *Amount of Development*

Could provide 460 homes based on the density suggested by Torbay Council in an emerging draft of the Local Plan (but not the adopted Local Plan).

#### *Planning Policy*

Part of the site was refused consent at appeal in 1997 (having been called in by the Secretary of State) for a business park due to landscape, highways and loss of agricultural land reasons. The Secretary of State attached "*substantial weight to the need to preserve the high quality of the Dart Valley AONB, one of the finest riverene landscapes in the country*" and took the view that the "*peripheral location... on the far side of the built-up area ... would result in a growth rather than a containment in car travel*".

#### *SHLAA Status*

Identified in the 2013 SHLAA as two separate sites, one for 250 homes T756(b) (39.4 ha) and another for 100 homes T739 (42.6 ha).

#### *Opportunities*

The site is very large and could offer an opportunity to accommodate some development.

*Constraints*

Development of this site would demonstrably impact on sweeping public views into Dart Valley AONB from the Dartmouth Road, something which currently significantly contributes to the character of the area. Furthermore, the open countryside at this location provides an important area of separation between the village of Galmpton and the Town of Paignton and any development would lead to the coalescence of these settlements. The site is also farmland which is likely important to Greater Horseshoe Bats and other protected species.

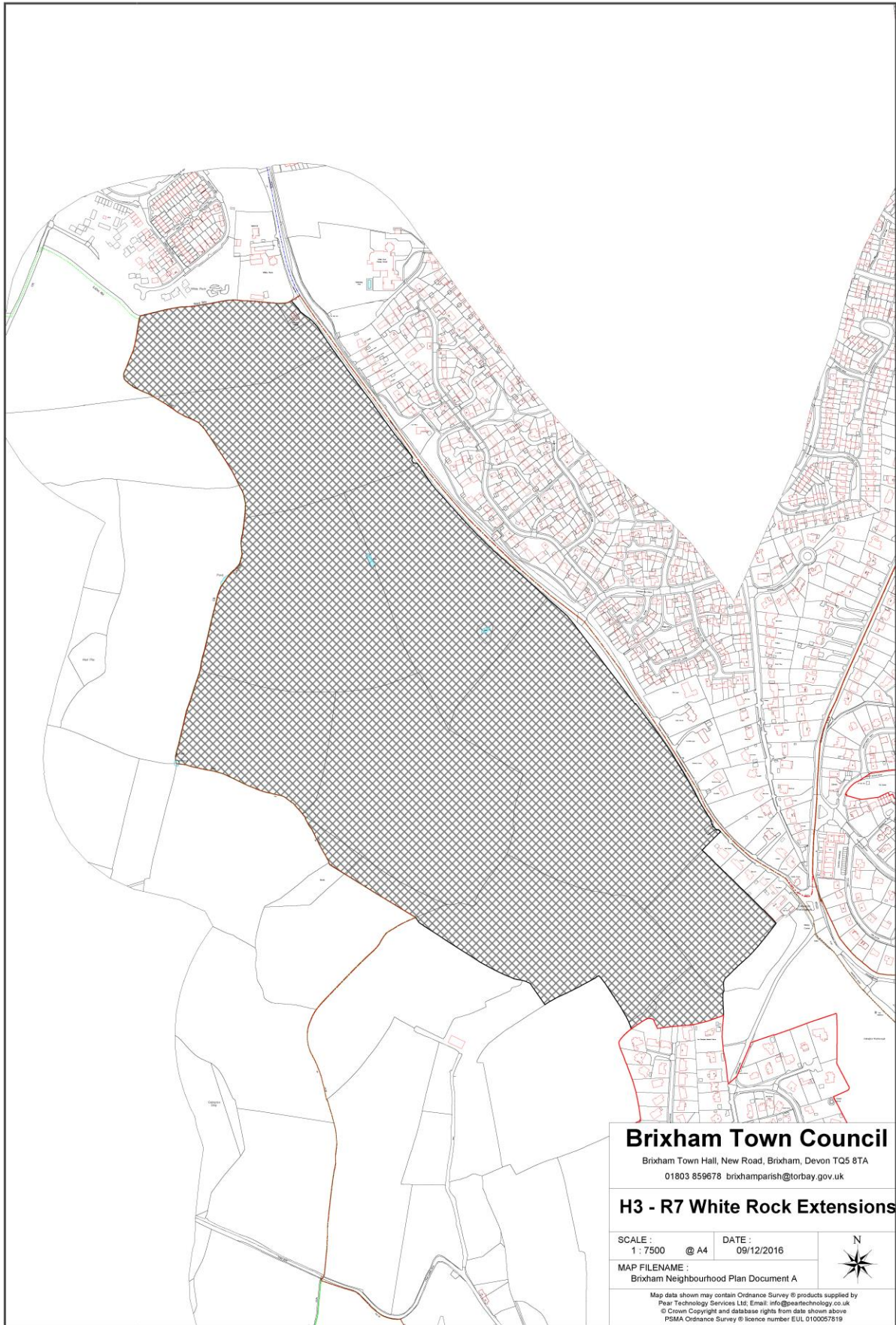
*Assessment Conclusions*

Site is suitable	N
Site is available	Y
Site is achievable	N

*Conclusions*

Development of the site, so close to recently completed extensive developments in White Rock, would be a major urban encroachment into an area of sweeping farmland which flows into the Dart Valley AONB. There is likely to be a significant ecological impact through development on the scale of this site. This site is not considered suitable for inclusion in the Neighbourhood Plan.





### **H3 – R8: Churston Golf Club (Clubhouse and 1st and 18th holes)**

#### *Address*

Churston Golf Club, Dartmouth Road, Churston

#### *Site Area*

4.3 ha (1<sup>st</sup> and 18<sup>th</sup> holes and Club House)

#### *Description*

The site is the location of the Clubhouse and 1<sup>st</sup> and 18<sup>th</sup> holes of Churston Golf Course.

#### *Amount of Development*

Demolition of the Club House and removal of two holes from the 1<sup>st</sup> and 18<sup>th</sup> land could provide space for between 30 and 132 homes based on historical consents achieved (P/1982/1410 and P/2011/0829).

#### *Planning Policy*

The site is proposed for Local Green Space designation in the Neighbourhood Plan.

#### *SHLAA Status*

Identified in the 2008 SHLAA for 147 homes (site T735) and included, following the planning consent, in the 2013 SHLAA for 132 homes. The 2008 SHLAA referred to a contemplated planning application to relocate the Clubhouse to the AONB and suggested this would be “*contentious*” and that if this did not succeed it was “*very unlikely this site will come forward*”. In the event, that application did not succeed and neither did a subsequent application.

#### *Opportunities*

n.a.

### *Constraints*

There are multiple constraints on the development of the land. The land is subject to a Restrictive Covenant in favour of Churston Barony and Lease User Clause in favour of Torbay Council requiring it be used for a Golf Course or Agriculture. The release of same would likely prejudice the delivery of other local sites owned by these two landowners.

The Clubhouse would need to be relocated. 5 sites have been the subject of planning applications in the period 1974 to 2013 and all have failed. A further 4 sites were formally assessed in 2013 and rejected. An appropriate new clubhouse site would need to avoid the highways, landscape and ecology impacts of previous proposals. It is not clear how this could be achieved. On the basis of these constraints Torbay Council Planning Officers gave evidence to the Local Plan inspector that the site "*appears to be undeliverable*" (para 67).

The site is open and development would sever the important visual link between Bascombe Road and Dartmouth Road which serves to reinforce the open character of the area at a highly visible point.

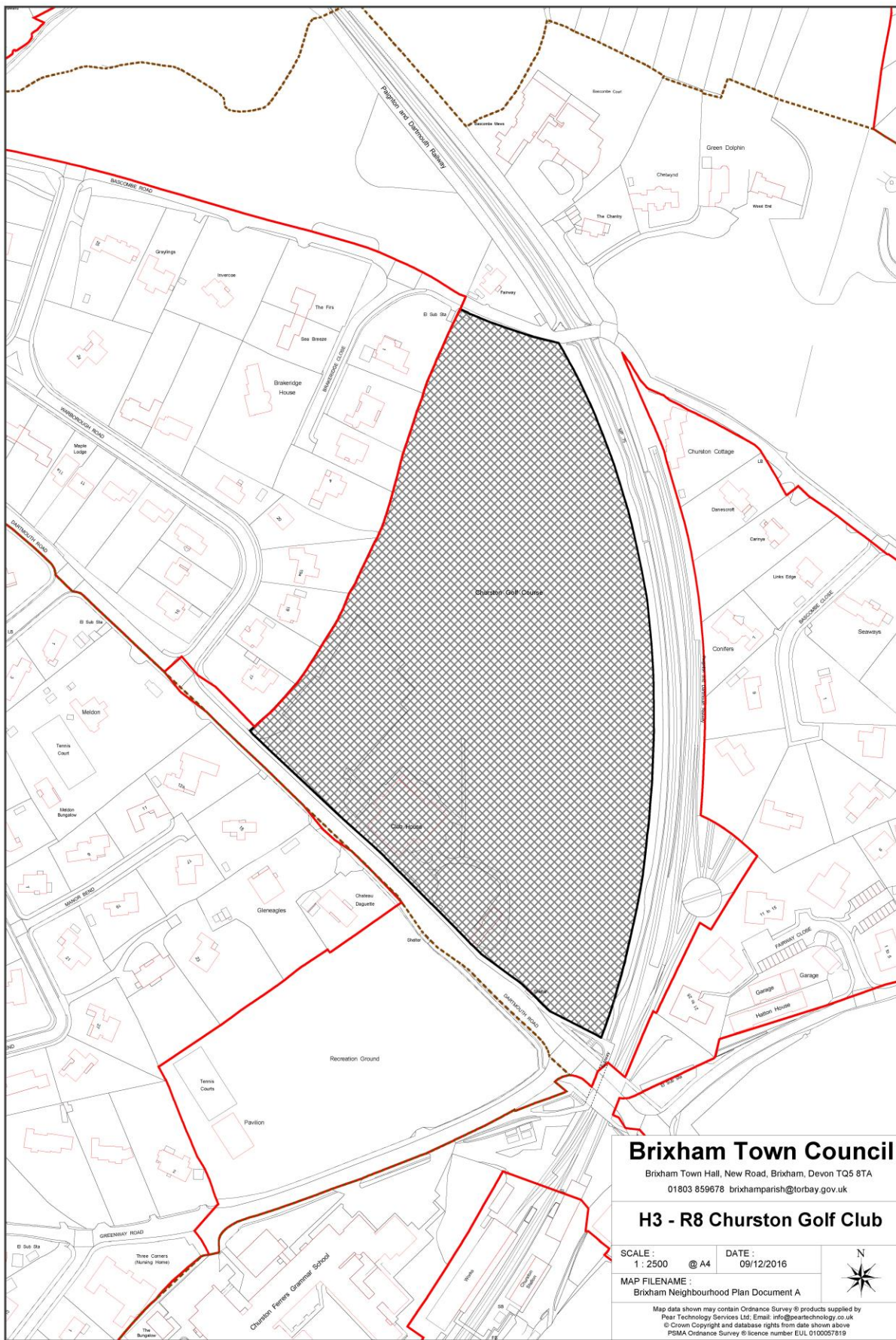
### *Assessment Conclusions*

Site is suitable	N
Site is available	N
Site is achievable	N

### *Conclusions*

This site was identified for consideration through the Neighbourhood Plan process in the Inspectors Report to the adopted Torbay Local Plan. Accordingly, the site has been considered in detail with help and participation from representatives of the Golf Club. The conclusion of this process is that the site is demonstrably undeliverable and that in all events the site should be rejected in favour of sites which have less negative impacts attached to their development.





### **H3 – R9: Brokenbury (West)**

*Address*

Agricultural fields to the south of the junction between Bridge Road and Bascombe Road, Churston

*Site Area*

3.9 ha

*Description*

Greenfield land on the edge of the village which is currently used for arable farming.

*Amount of Development*

n.a.

*Planning Policy*

The site is designated as a Countryside Zone and identified for sports use in the Local Plan. The site has a strong relationship to the nearby AONB.

*SHLAA Status*

Rejected in the 2013 SHLAA for the following reason: "*The site is distant from services and facilities and poorly related to the urban area. Development would have significant landscape impact on the nearby AONB and result in the reduction of the gap between settlements. It would have a negative impact on the character and setting of Churston and was discounted as part of the Broad Location in the 2008 SHLAA. It is therefore not considered suitable for large scale residential development.*"

*Opportunities*

n.a.



*Constraints*

The site lies in an area highly sensitive to change. Most of the site is open to views from the AONB to the west and south, although towards the east of the site the greater level of visual containment means some parts of the site are less sensitive. The site is not within a flood risk area, although Churston Watercourse (main river) runs to the east of the site. The site is also very important in terms of preventing coalescence between Churston and Broadsands and, as such, protecting the rural character of these villages. The site is also within the Greater Horseshoe Bat sustenance zone. Part of the site lies within land classified as Grade 2 agricultural land.

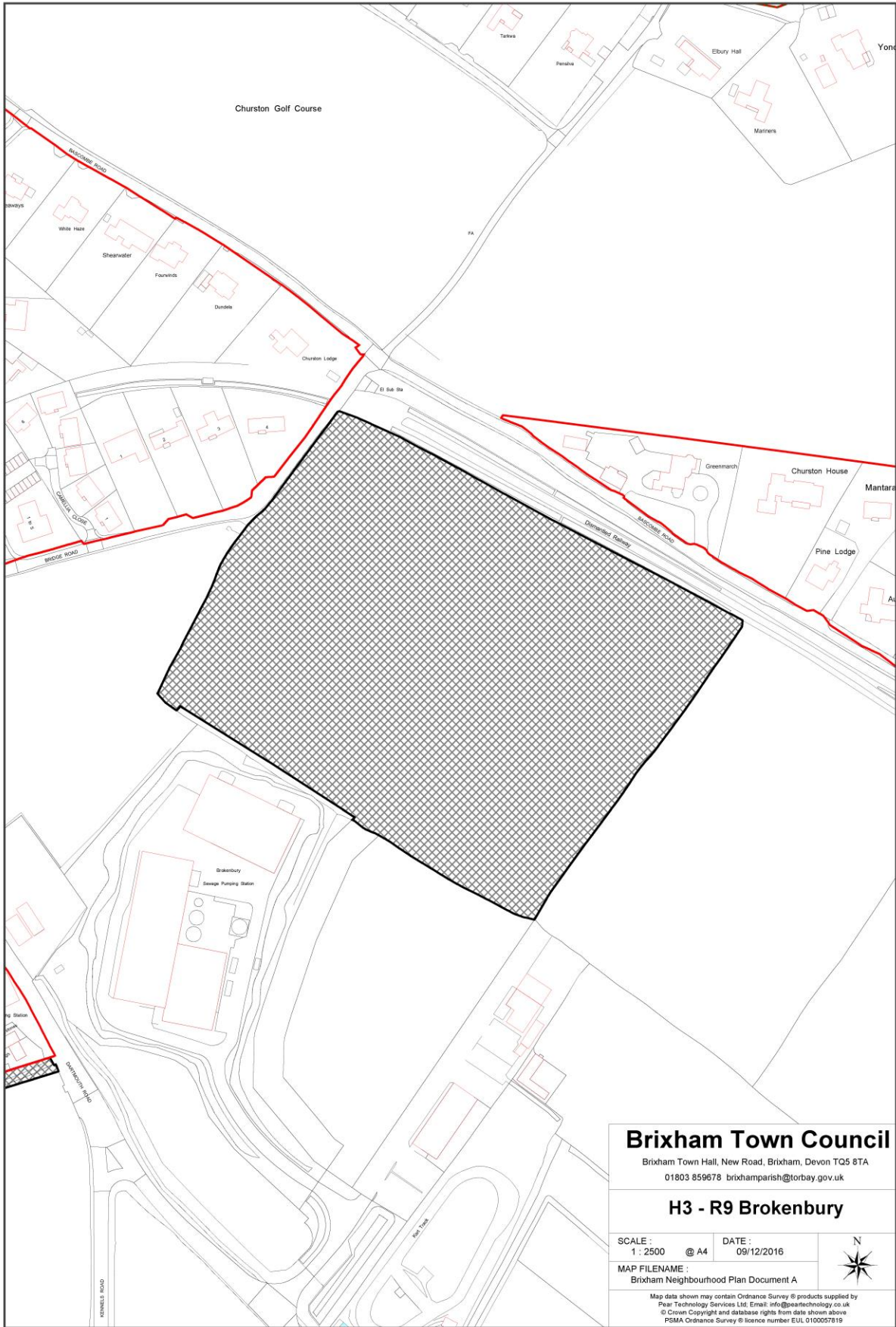
*Assessment Conclusions*

Site is suitable	N
Site is available	N
Site is achievable	N

*Conclusions*

The site has been identified in the new Local Plan as providing much needed recreation facilities. As such, alternative space would need to be found for these facilities. This has proven difficult to date and the most likely alternative location is within the AONB. In addition, access to the site (from the east) is demonstrably poor as highlighted by the traffic modelling of the Bridge Road/Dartmouth Road junction in planning application P/2013/0019 and alternative access, potentially from the west off Brixham Road, would need to be provided.

The site is not suitable for the delivery of housing in the Neighbourhood Plan.



### **H3 – R10: Field adjacent Greenway Road/Greenway Park**

*Address*

Part of an agricultural field to the south of Greenway Road, Galmpton

*Site Area*

1.0 ha

*Description*

Greenfield site, currently in agricultural use. The site is one part of the field; the other part is within the AONB.

*Amount of Development*

Identified in 2013 SHLAA for 6 units.

*Planning Policy*

The AONB boundary designation cuts through a field and does not follow an established physical boundary. This site comprises that part of the field not designated AONB but is immediately adjacent to it, and so it is highly foreseeable that there could be an impact on the AONB through development at this location. The site is designated as a Countryside Zone.

*SHLAA Status*

2013 SHLAA for 6 units (see above).

*Opportunities*

n.a.

*Constraints*

Greater Horseshoe Bats identified through HRA screening. Further surveys are required under HRA regulations; however, the landowner withdrew the availability of the site when it became clear that this work would be needed.

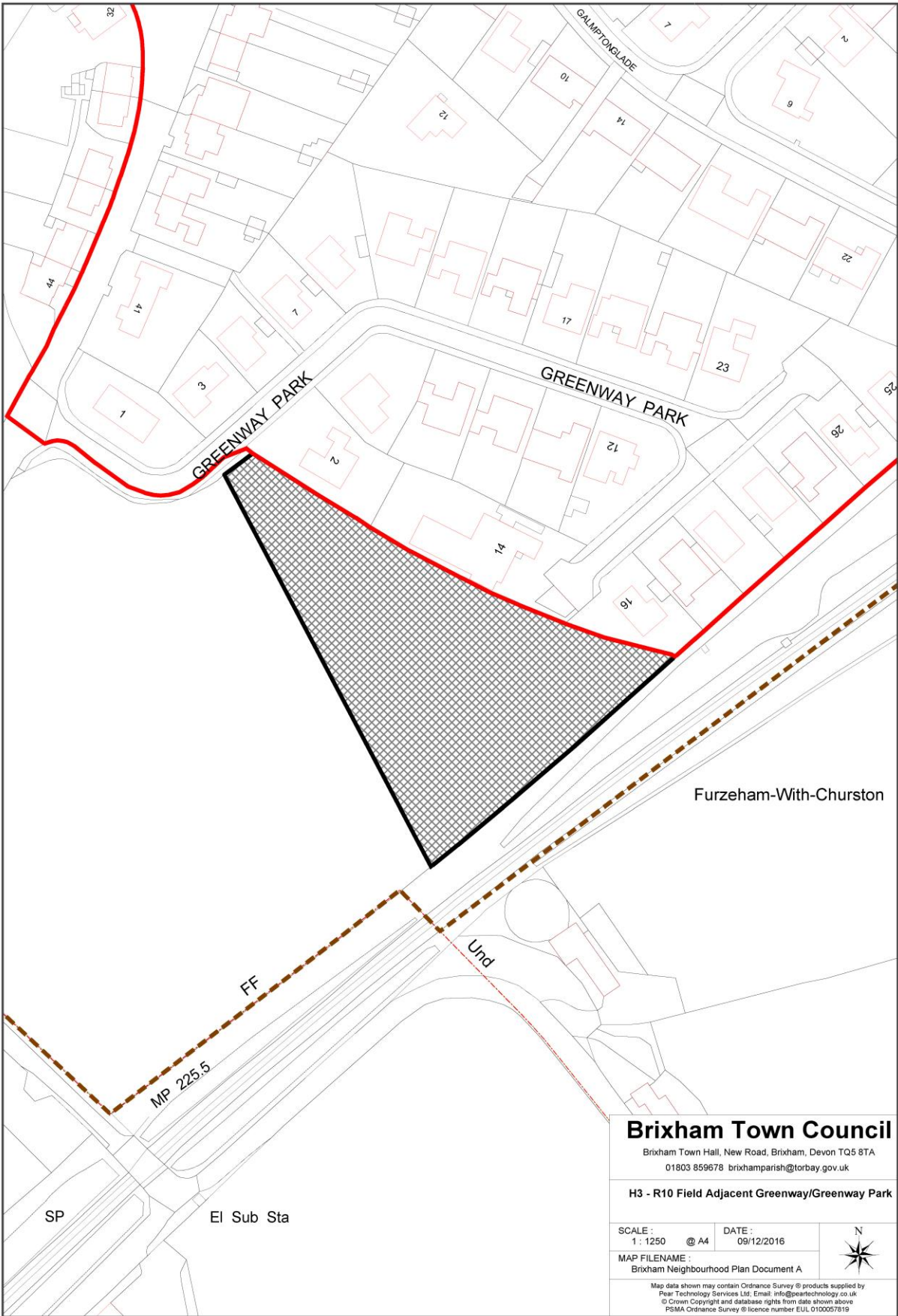
It is unclear how access arrangements and mitigation of any impact on the AONB would be resolved, something which appears potentially possible but yet unresolved, following the withdrawal of the site.

*Assessment Conclusions*

Site is suitable	N
Site is available	N
Site is achievable	Y

*Conclusions*

This site is excluded from the Neighbourhood Plan by reason of non-availability, as expressed by the landowner. There are also issues of environmental sensitivity that may well render it not suitable for development.





### **H3 – R11: Pilgrim’s Friend Land (“Archery Field”)**

#### *Address*

Agricultural fields to the west of the junction between Dartmouth Road and Kennels Road, Churston

#### *Site Area*

4.9 ha

#### *Description*

Greenfield land on the edge of the village. The land is currently leased to Brixham Archers as an outdoor archery butt (archery shooting range). The land is owned by Pilgrim’s Friend, a charity devoted to support for the elderly and who own a number of residential facilities for the elderly.

#### *Amount of Development*

Potentially up to 200 units at 40 dph (but such a scale and density would not be appropriate).

#### *Planning Policy*

The site is within the Countryside Zone and has a close connection with the nearby AONB.

#### *SHLAA Status*

Not included in the SHLAA.

#### *Opportunities*

The owners have expressed a willingness to include an Extra Care facility on this site together with a modestly scaled residential development.

#### *Constraints*

HRA screening shows the presence of Greater Horseshoe Bats. Habitat Regulations Surveys have continued through the year to October 2016 in order to give a full season’s

assessment of likely impact. It would appear that mitigation may prove likely to be successful provided that the volume and location of development is controlled. A further constraint to development is the difficulty of accessing the site due to its position very close to the junction of two major roads. The owners of nearby Gliddon Ford Garage have indicated that they might provide land to improve access to the site but this offer may be contingent upon relocation of the Ford Garage and its servicing facilities which may not materialise. A more appropriate access solution, given the increased traffic generated by the Noss Marine Development in Kingwear, may involve access directly from an improved Dartmouth Road Kennels Road junction, the land for which may not be available.

#### *Assessment Conclusions*

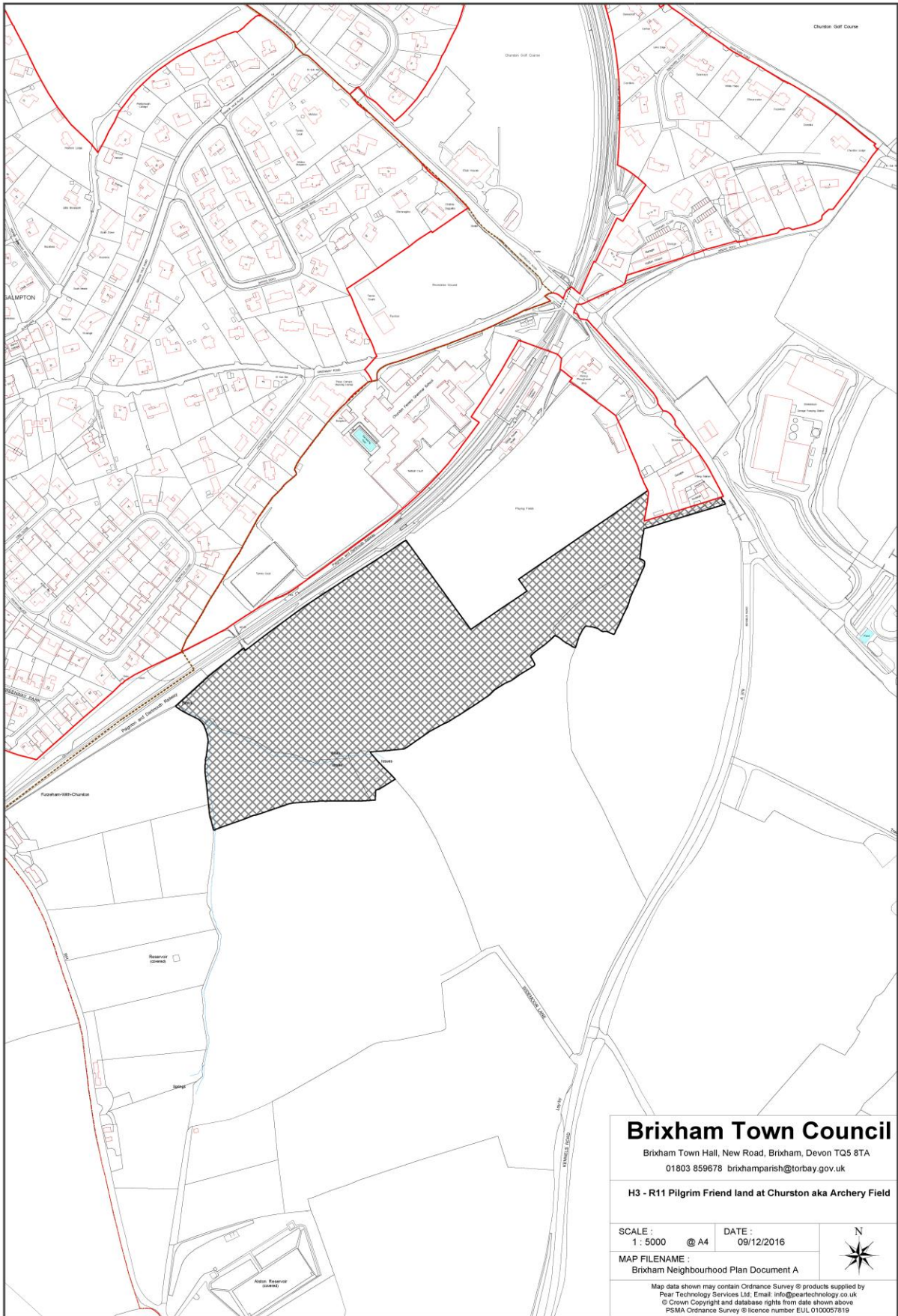
Site is suitable	Y
Site is available	Y
Site is achievable	N

#### *Conclusions*

The site has been rejected due to landscape and environmental constraints. Furthermore, given the size of the site the scale of development which could be brought forward in one place could well fail to properly integrate into the social fabric of the peninsula.


However, an Extra Care facility, if brought forward, would be welcomed by the local community which has a high number of retirees and is in need of such accommodation. Furthermore, whilst rejected, development of the site would have a lower impact than other rejected sites.

On this basis, there may well be potential for a development of some of the site only in a development which involved housing for older persons or the disabled in accordance with **Policy BH9 Exception Sites**. This potential is referred to at para 4.8 of the Policy Document.



**Brixham Town Council**  
 Brixham Town Hall, New Road, Brixham, Devon TQ5 8TA  
 01803 859678 brixhamparish@torbay.gov.uk

**H3 - R11 Pilgrim Friend land at Churston aka Archery Field**

SCALE: 1 : 5000 @ A4	DATE: 09/12/2016	
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### **H3 – R12: The Piggery**

*Address*

The Piggery, Elberry Lane, Churston

*Site Area*

1.26 ha

*Description*

The site currently comprises a single detached dwelling in expansive grounds which has been converted from former agricultural buildings.

*Amount of Development*

n.a.

*Planning Policy*

n.a.

*SHLAA Status*

Rejected by the 2013 SHLAA (ref. 13262).

*Opportunities*

n.a.

*Constraints*

The site is dominated by Flood Zone 3 and as such is not considered suitable for development.

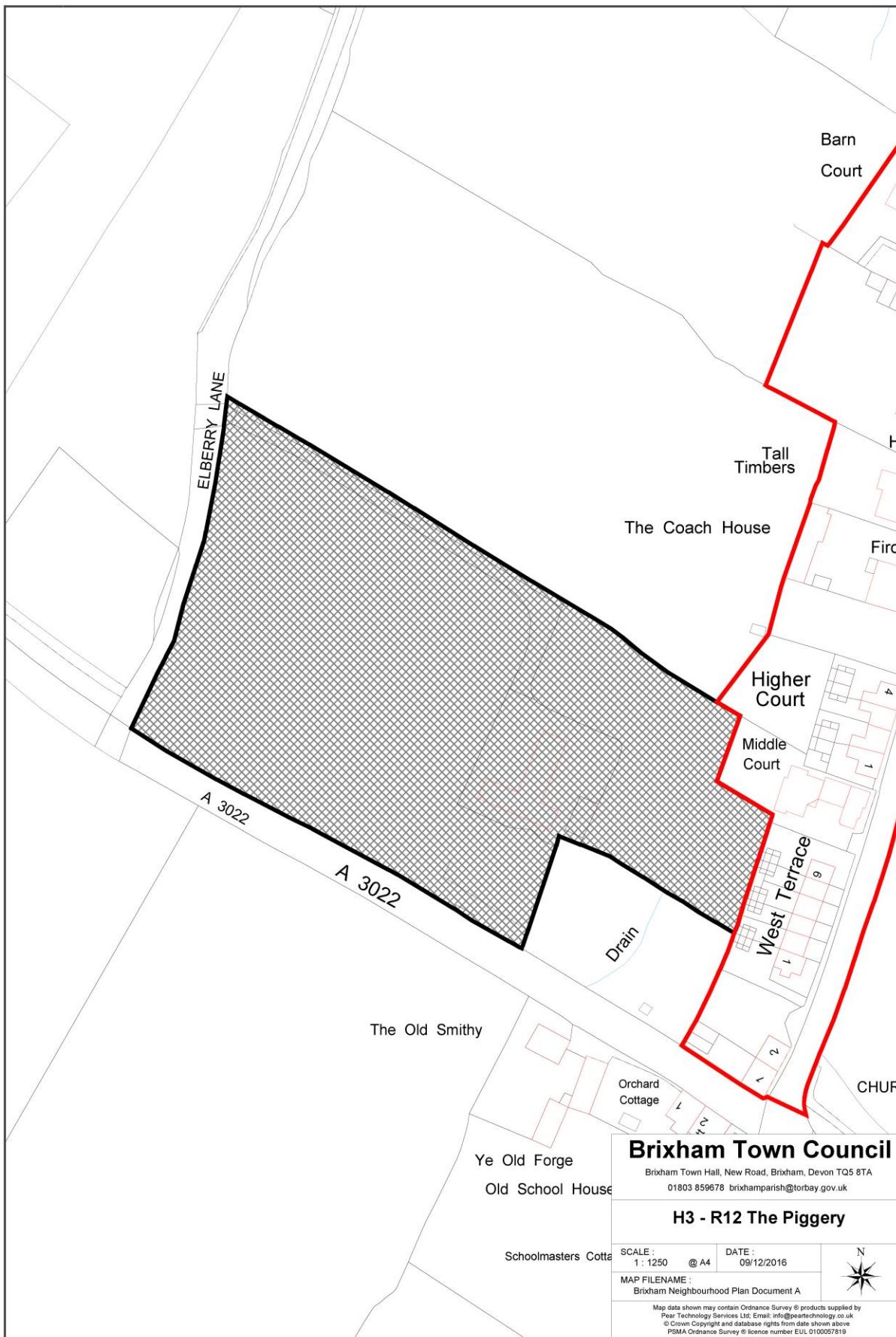
*Assessment Conclusions*

Site is suitable	N
Site is available	Y
Site is achievable	Y

*Conclusions*

The site is not appropriate for identification in the Neighbourhood Plan because of the high risk of flooding, and the landscape, road safety and environmental constraints.





### **H3 – R13: Ferrers Green**

*Address*

Agricultural fields to the south of Ferrers Green off Churston Road

*Site Area*

0.79 ha

*Description*

A greenfield site which forms part of Churston Farm and is currently used for livestock farming.

*Amount of Development*

n.a.

*Planning Policy*

n.a.

*SHLAA Status*

Rejected by the 2013 SHLAA (ref. 13243).

*Opportunities*

n.a.

*Constraints*

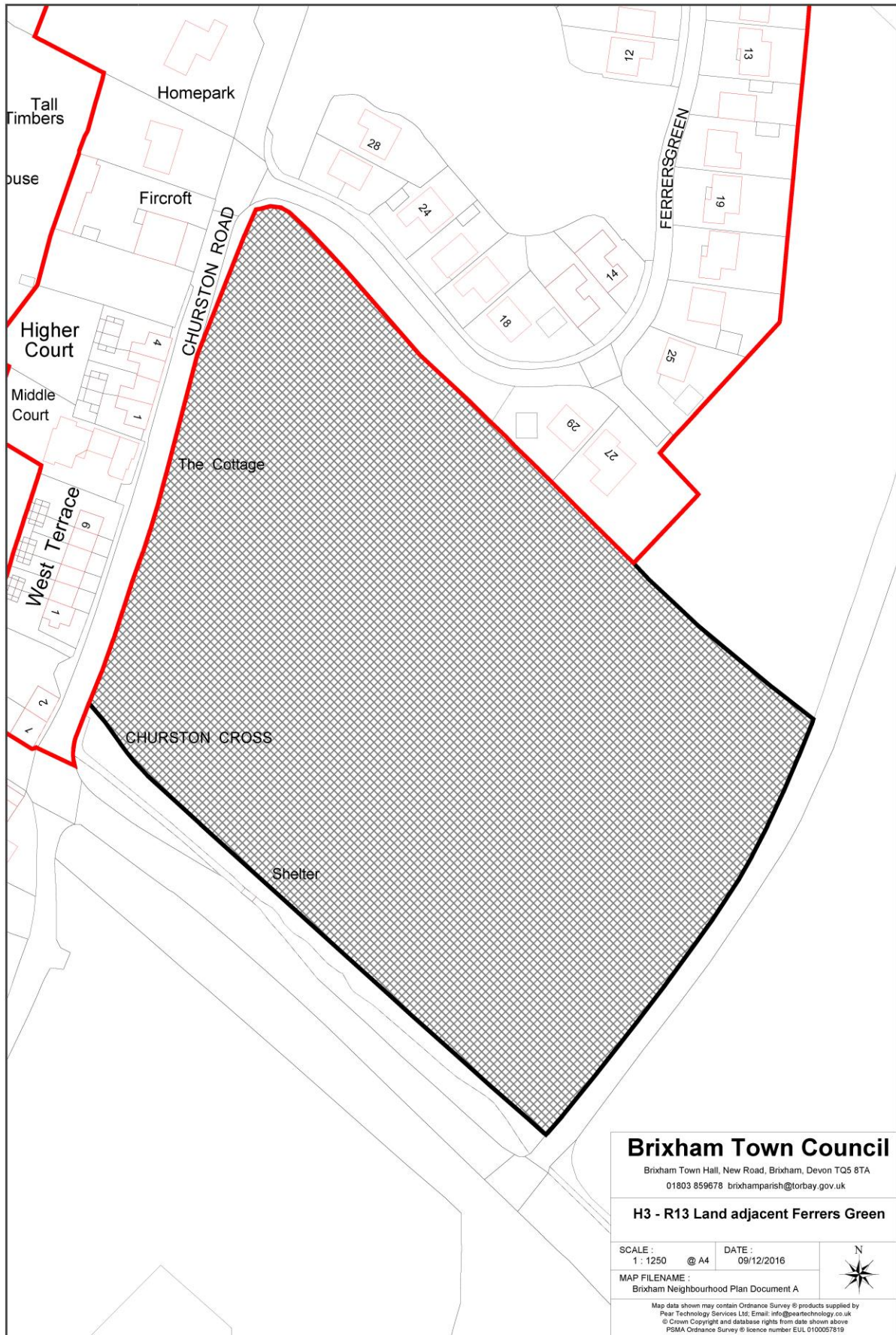
A previous planning application P/1981/1031 was refused and dismissed at appeal due to reasons of the loss of agricultural land and road safety at Churston Road and the Churston Cross junction (APP/5183/A/81/12355/G7).

*Assessment Conclusions*

Site is suitable	N
Site is available	N
Site is achievable	N

*Conclusions*

The site is not appropriate for identification in the Neighbourhood Plan because of landscape, road safety and environmental constraints.





### **H3 – R14: Mathill Road**

#### *Address*

Agricultural fields to the north of Mathill Road opposite the junction with Mathill Close, Brixham

#### *Site Area*

0.78 ha

#### *Description*

A greenfield site which currently forms part of a small-holding and which is used for farming.

#### *Amount of Development*

n.a.

#### *Planning Policy*

The site lies wholly within the AONB and also lies in the Countryside Area. The site is also in or near a flight path area and sustenance zone for Greater Horseshoe Bats.

#### *SHLAA Status*

Identified by the 2013 SHLAA (ref. 13259) for 20 dwellings.

However, the site was excluded from the adopted Local Plan in document TC4 because:

*The site is on the edge of the built up area and not particularly close to local facilities. It lies in an area with multiple environmental constraints. It lies within South Devon AONB, GHB sustenance zone and flyways, classified as Grade 2 agricultural land, green-field land. The site itself is not located in a surface water flood area. There is however a functional floodplain within 250 m (Lupton watercourse and Higher Brixham watercourse to the north). As such the site is not considered appropriate for development. Part of the site is proposed for a "green" cemetery in the existing Local Plan 1995–2011, although this has not been implemented.*



*Opportunities*

n.a.

*Constraints*

The site was proposed by the owners for potential inclusion in the Neighbourhood Plan.

However, as noted in the reasons for the exclusion of the site from the Local Plan, the site suffers from a number of severe constraints.

The site is within the AONB at a ridge line point which is highly visible and frames the gateway approach to Brixham on the main road. The site also lies within the Greater Horseshoe Bat sustenance zone and with likely nearby flyways. The site is classified as Grade 2 agricultural land.

Much of the land slopes down towards the valley containing the Lupton watercourse and it also lies within 250 m of the Higher Brixham watercourse to the north.

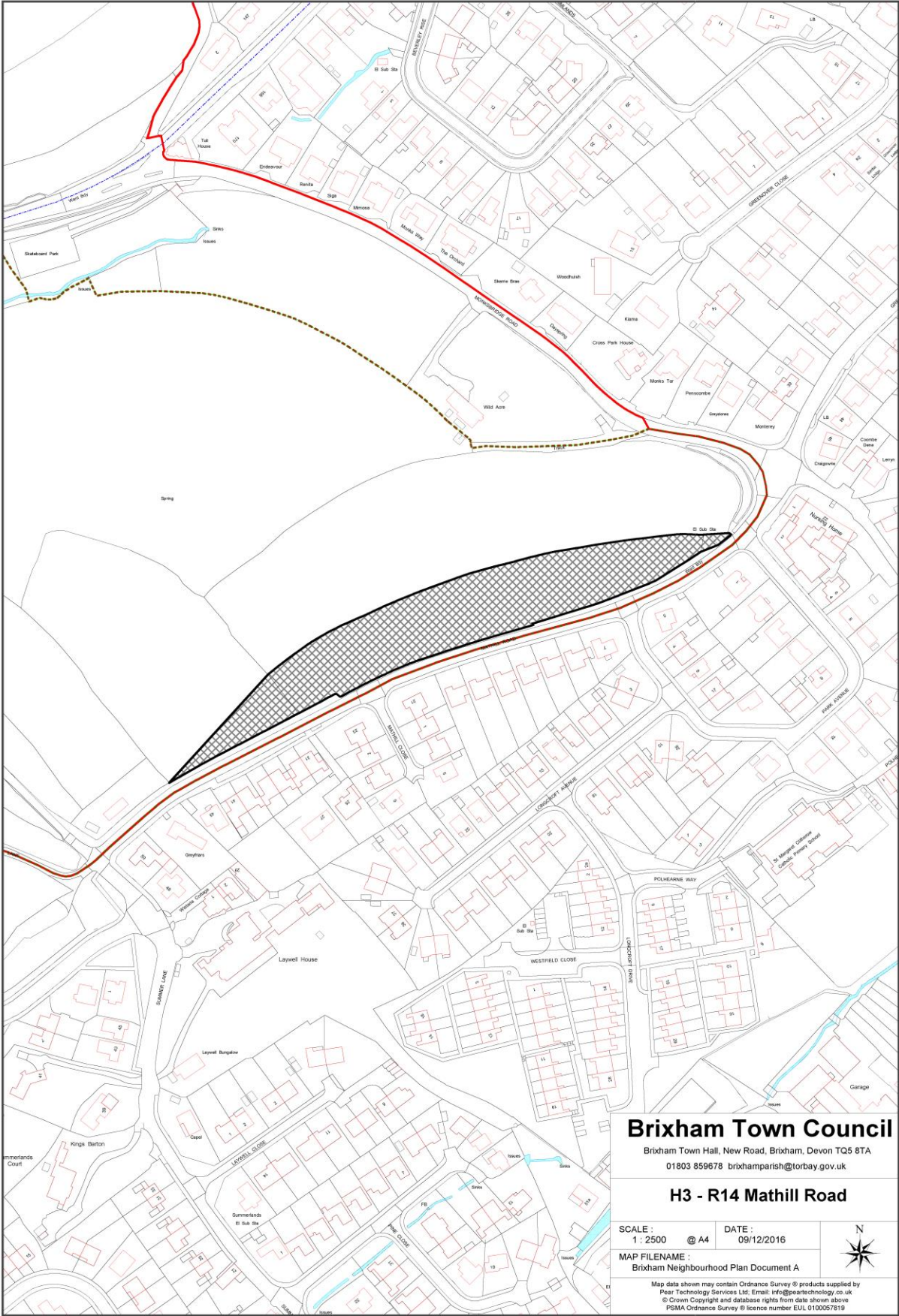
*Assessment Conclusions*

Site is suitable	N
Site is available	Y
Site is achievable	N

The site is not considered achievable as it is subject to a number of severe constraints.

*Conclusions*

The site is not appropriate for identification in the Neighbourhood Plan because of the severe environmental and landscape constraints.



### **H3 – R15: Copythorne Road**

*Address*

Agricultural fields to the south of Copythorne Road opposite the junction with North Boundary Road

*Site Area*

3.23 ha

*Description*

A greenfield site which forms part of Churston Farm and is currently used for arable farming.

*Amount of Development*

n.a.

*Planning Policy*

The site lies wholly within the AONB and also lies in the Countryside Area. The site is also in or near a flight path area and sustenance zone for Greater Horseshoe Bats.

*SHLAA Status*

For reasons unknown, the site, which has not been promoted by the landowner since 2001, was identified in the 2013 SHLAA (ref. 13241) for 80 dwellings.

However, the site was excluded from the adopted Local Plan in document TC4 because:

*The site lies in an area with a number of environmental constraints. It is situated within South Devon AONB and the whole site classified as Grade 2 agricultural land. It is also a green-field site within an area of Brixham Limestone that forms part of the New Local Plan Mineral Safeguarding Area and there are other biodiversity constraints. Consequently, whilst it appears to provide a natural extension to Brixham, the sensitivities and value of the site (e.g. for agriculture, AONB) are such that the site is considered unsuitable for development.*

*Opportunities*

n.a.

*Constraints*

The site suffers from a number of severe constraints.

It lies wholly within the South Devon AONB and no exceptional circumstances have been provided for its development. The site is also classified as Grade 2 agricultural land and is very close to the farmyard and barns at Churston Farm, which is likely to cause conflict between the retention of a viable farm and residential amenity. The site is also in or near a flight path area and sustenance zone for Greater Horseshoe Bats and a known area for Cirl Buntings. The site is also within the Local Plan Mineral Safeguarding Area.

Consequently, whilst viewed on a map it could be argued that the site forms a logical extension to Brixham, the sensitivities and value of the site (e.g. for agriculture, AONB) and the landscape contribution it makes on the ground are such that the site is considered unsuitable for development and has been excluded from the Neighbourhood Plan.

*Assessment Conclusions*

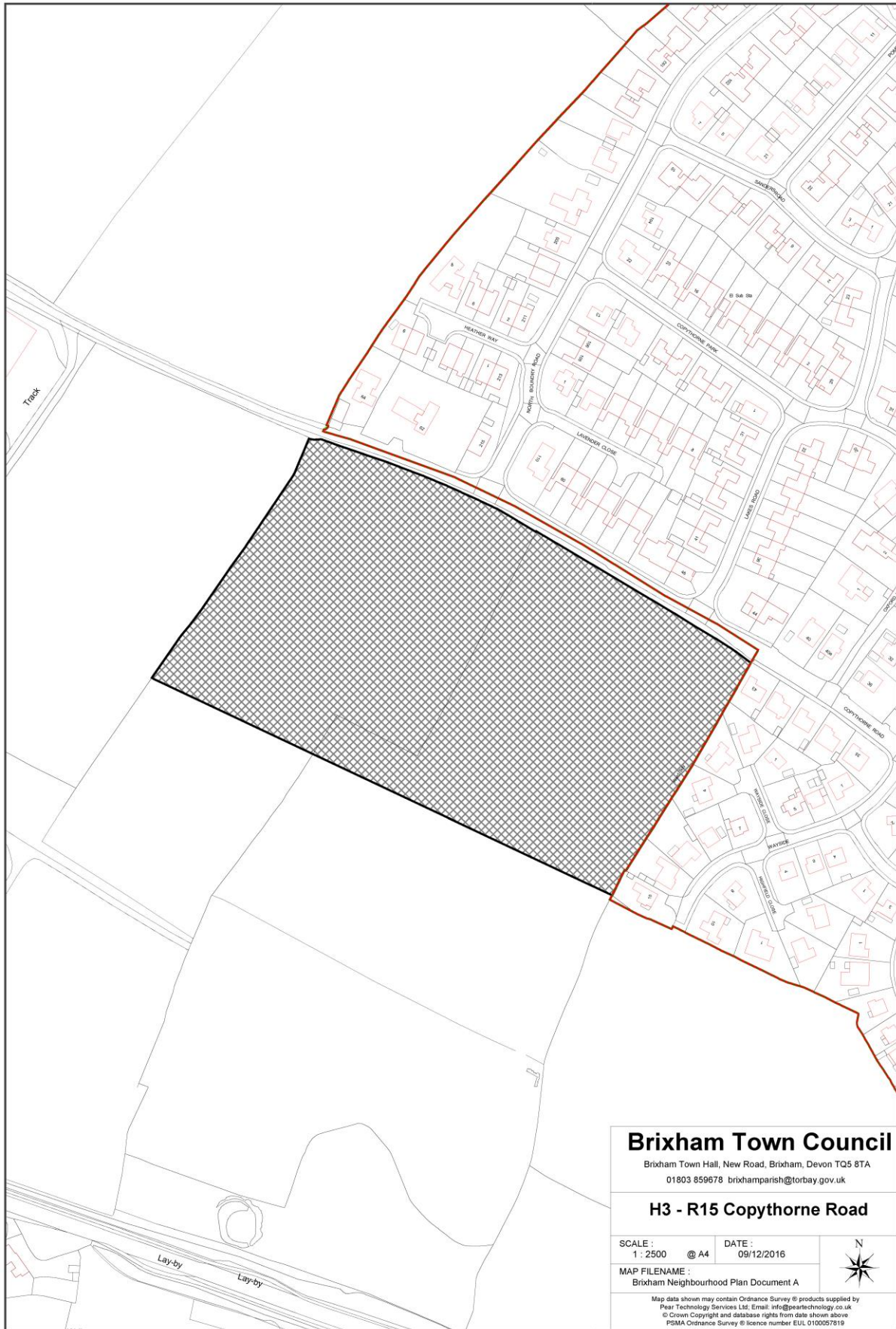
Site is suitable	N
Site is available	N
Site is achievable	N

The site is not considered achievable as it is subject to a number of severe constraints.

*Conclusions*

The site is not appropriate for identification in the Neighbourhood Plan because of the severe environmental constraints.







## **Appendix 1: Further supplementary information on Upton Manor Farm Campsite**

### **A1.1 Appeal relating to the development of Upton Manor Farm Campsite**

A planning application which covered *inter alia* the development of Manor Farm Campsite and the adjacent industrial estate for 137 houses was submitted by the landowners several years ago (planning application P/1988/1135). Following refusal, this was subject to an appeal to the Planning Inspectorate and the Secretary of State.

Extracts from the appeal decision are given below:

Extract from the letter from the Department of Environment re "Town and Country Planning Act 1971 Appeals by Mr and Mrs W Hoskins". Letter dated 11 December 1989

*3. The Secretary of State agrees with the Inspector's conclusions and accepts his recommendations. He is of the view that, in the case of Appeal A, any presumption in favour of development, based on the advice in Circular 15/84, is outweighed by the serious harm the proposal would cause to the character of the surrounding Area of Outstanding Natural Beauty. Moreover, the Secretary of State considers that residential development would constitute an unacceptable intrusion into the countryside and erode the attractive landscape setting of Brixham. Furthermore, he considers the developments proposed in both Appeals A and B would lead to substantial difficulties in terms of road and pedestrian safety which the proposed highway improvements would only partially alleviate. Whilst the Secretary of State considers this objection is, on its own, insufficient to justify refusing Appeal A, he is of the opinion that it is sufficient to warrant refusing Appeal B, where the traffic of touring caravans likely to be generated by the development would have a more serious effect on local roads.*

*4. It should be noted the Secretary of State does not wish to prejudice the consideration of any future application for; the site at the St Mary's Road/Upton Manor Park junction. Consequently, he dissociates himself from the Inspector's comments in paragraph 6.11 of his report that the character of the area would best be served by retaining and converting to residential use the buildings on this site, and accepting the consequent restrictions on visibility.*

*5. Therefore, for the reasons given the Secretary of State hereby dismisses your clients' two appeals.*

The Inspector's final conclusion re Appeal A, which is that dealing with the residential development is:

*6.12 In summary, I am of the opinion that, in the context of the requirements of Circular 15/84, the presumption in favour of development is strengthened in this case. However, having regard to the emerging nature of the Local Plan, and the vagaries of the land supply situation and the development process, calculations used to indicate land availability are imprecise and can only serve to show the broad pattern of provision rather than provide a definitive figure for the number of years supply. Accordingly, and in view of the close approximation of the appellant's, local planning authority's, and my conclusions concerning the land availability situation, I am of the opinion that my recommendation on this appeal should not turn upon precise calculations of this nature. However, the appeal proposal clearly conflicts with the well established objectives of the Area of Outstanding Natural Beauty, and with the emerging countryside policies in the draft Local Plan. Having carefully assessed the potential impact of the appeal proposal upon the local environment, I am firmly of the opinion that the proposed development would be seriously detrimental to the character of the Area of Outstanding Natural Beauty and the surrounding countryside in general, and that accordingly appeal A should be dismissed.*

#### **A1.2 Upton Manor Farm Bat survey (Blue Sky Ecology 10/10/2016)**

Section 4 "Evaluation" of the Blue Sky Ecology report is given below:

##### *4.1 Review of Recommendations*

*As there are no known design proposals for the site Blackdown Environmental were unable to make specific recommendations with regards to the design of any new development. However, there are some details that can be addressed at this early stage. It is identified that a European Protected Species Licence will be required prior to the demolition/renovation of the buildings on site. This is to protect and mitigate the expected impacts on bat roosts which are legally protected.*

*Due to the site's proximity to Berry Head SSSI and the South Hams SAC any proposal will need to undergo a Habitat Regulations Assessment which is explained in detail in Appendix 1 of 'The Greater Horseshoe Bat Report'.*

*The reports also identify some generic mitigation/enhancement that will be required regardless of the final design. This includes;*

- *Retention of boundary hedgerows/treelines*
- *Developing the minimal amount of land possible*
- *Avoidance of increased lighting*
- *New roost creation*
- *Creation of foraging habitat.*

*These measures will be developed after consultation with planners, Natural England and developers.*

#### *4.2 Conclusion*

*Blue-Sky Ecology has carefully read and reviewed all the documents provided by Savills. Particular attention has been paid to the reports relating to bats. The methods, results and evaluations have been looked at in detail and it is concluded that the surveys were undertaken in a considered manner, using the relevant guidance available. The design of the surveys was appropriate and thorough. The reports are clear and well-presented and they provide all the information required to make assessments about the predicted impacts on bats should this site be developed in the future. Clearly, further consultation with appropriate decision makers will be required as the project progresses to ensure that mitigation and compensation measures are designed into the overall design of the site.*







Typeset by Sunrise Setting Ltd, Brixham

Brixham Peninsula Neighbourhood Plan 2012–2030. Adopted June 2019