



Brixham Town Council

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Town Clerk: Mrs Tracy Hallett

Torbay Council
Planning Department
Town Hall
Castle Circus
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9th December 2019

Dear Sirs

P/2017/1133 MOA Inglewood

Brixham Town Council considered the amended planning application P/2017/1133 at its Planning and Regeneration Committee on Monday 2nd December. The meeting included representatives from the Brixham Peninsula Neighbourhood Forum (BPNF) and this updated representation from Brixham Town Council should be regarded as also being made on behalf of the Brixham Peninsula Neighbourhood Forum. Importantly this representation should be read alongside and in addition to all previous comments submitted by Brixham Town Council and the Brixham Peninsula Neighbourhood Forum.

Brixham Town Council remains phenomenally opposed to this application and **OBJECTS** in the strongest terms.

Contravention of key Neighbourhood and Local Plan Polices.

The construction of a village in the proposed outlined location is averse to every key policy of the Brixham Peninsula Neighbourhood Plan (BPNP) and contrary to a major policy of the Torbay Local Plan which defines clearly the area of Inglewood as Countryside (Policy C1) and clearly states that it should remain as Countryside. The key polices which are directly contravened are:

- BH4 Brownfield & Greenfield sites
- BH9 Exception Sites
- E1 Landscape beauty and protected areas
- E2 Settlement boundaries
- E3 Settlement gaps:
- E6 Views and Vistas:
- E8 Internationally and nationally important ecological sites
- T1 Linking of new developments to travel improvements

In addition to the direct breach of policies listed above, members raised concerns regarding the following matters:

Landscape

The application would cause a demonstrable impact on the ANOB at highly prominent public view receptor and it was considered difficult to conceive of a more poorly located site from the perspective of the scale of the negative impacts arising, and the scale of the departure from the neighbourhood plan.

Although this is an outline application, the scale of the development and information provided to date appears contrary to Good Design Policy (BH5).

Transport

There is inadequate road infrastructure to accommodate the development given its proposed location in an area that already suffers from severe congestion in spite of recent improvements to the highway.

Combination of poor location and insufficient safe cycling and walking access will result in a growth not containment in car travel and increased carbon footprint. Members assessed this transport impact as "severe".

Furthermore the development will have a detrimental impact on the air quality due to increased vehicle use and congestion and no mitigation has been identified.

Affordable Housing

The application would result in a substantial reduction in affordable housing provision compared to the requirements of the BPNP Exception Sites Policy (BH9).

Ecology

The application does not demonstrate to the requisite level of certainty that the proposed mitigation will offset the detrimental impacts caused by the development. Specifically, and of particular importance given this is a departure application on a rejected housing site and therefore outside of the assessment of planned development undertaken at plan making stage, members could find no in combination assessment as per BPNP Policy E8. Further, there remains uncertainty on the effectiveness of the mitigation proposed and the certainty of its delivery over the longer term.

Drainage

Concerns over surface water flooding.

S106 provision

Although this is an outline application, the indicative layout shows very limited amenity space, while that space shown appears of poor design. This is considered highly likely to increase recreational pressure on the South Hams 'Special Areas of Conservation' (SAC) at Berry Head and there does not appear sufficient financial provision to cover the unplanned additional pressures.

Overall, it is difficult to conceive a more poorly located site given the scale to which the proposed development departs from the BPNP and Torbay Local Plan. The development would have a demonstrable impact on the AONB in highly prominent public views and vistas and will result in a fundamental and irreversible loss of this important greenfield site.

Yours faithfully

Linda McGuirk

Linda McGuirk
Deputy Town Clerk