

# Brixham Peninsula Neighbourhood Plan Strategic Environmental Assessment

Environmental Report  
to accompany the Submission version of the  
Neighbourhood Plan

August 2017

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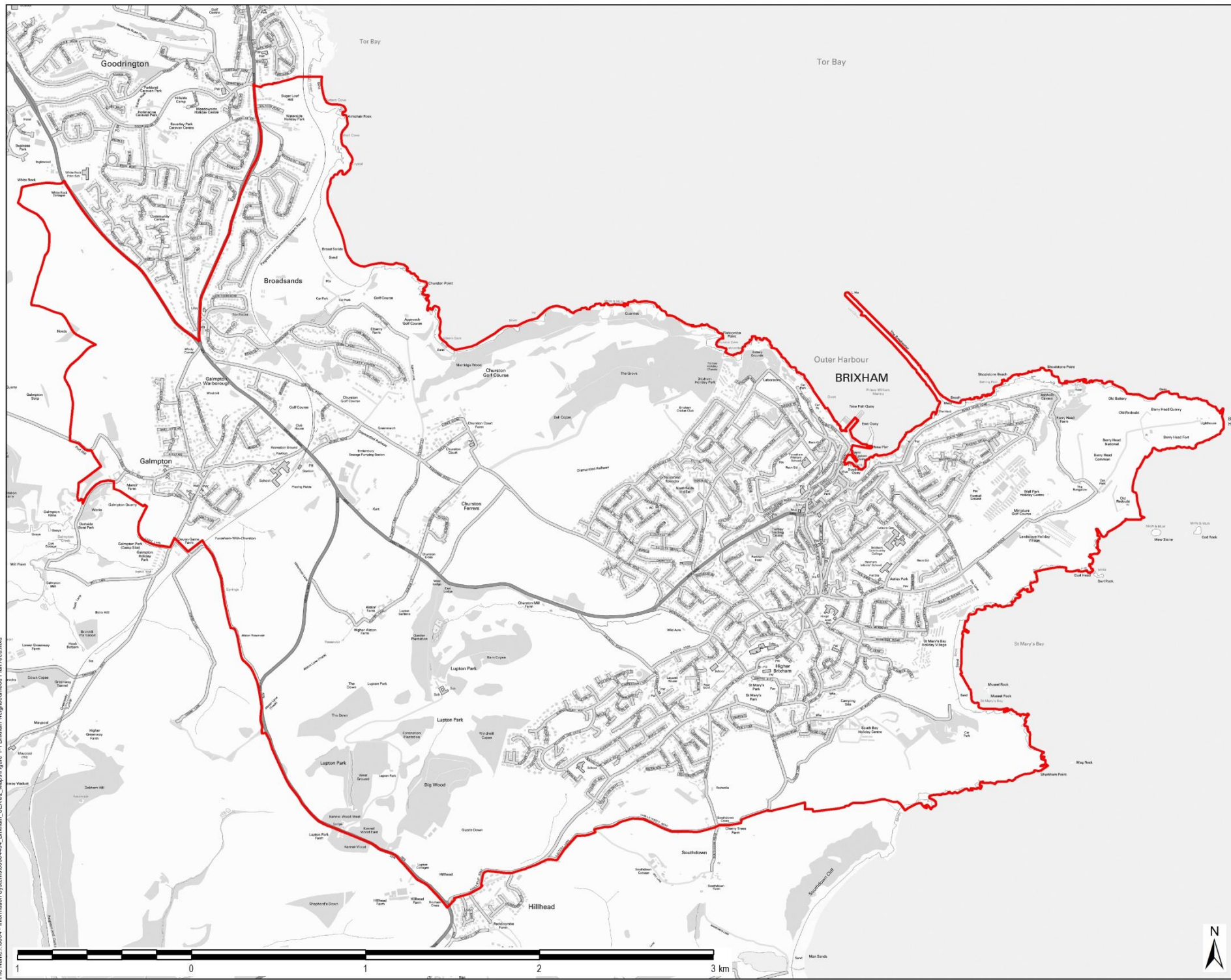
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**LEGEND**

Brixham Neighbourhood Plan Area



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## Non-Technical Summary

### What is strategic environmental assessment?

A strategic environmental assessment has been undertaken to inform the Brixham Peninsula Neighbourhood Plan. This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan, and to identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

### What is the Brixham Peninsula Neighbourhood Plan?

The Brixham Peninsula Neighbourhood Plan (BPNP) presents a plan for the Brixham Peninsula for the period to 2030. The Neighbourhood Plan area incorporates the town of Brixham and the villages of Churston, Galampton and Broadsands in south Devon. Prepared to be in conformity with the Torbay Local Plan, the BPNP sets out a vision and a range of policies for the Neighbourhood Plan area. These relate to a range of topics, including, but not limited to, regeneration, landscape and townscape character, the quality of life of residents, tourism and the protection and enhancement of the environment.

It is currently anticipated that the BPNP will undergo a referendum later in 2017.

### Purpose of this Environmental Report

This Environmental Report, which accompanies the version of the BPNP submitted to Torbay Council in July 2017, is the third document to be produced as part of the SEA process. The first document was the SEA Scoping Report (March 2015), which includes information about the Neighbourhood Plan area's environment and community. The second document was the SEA Environmental Report which accompanied Regulation 14 consultation on the BPNP (January 2017).

The purpose of this Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the Submission version of the BPNP and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the BPNP and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SEA Framework of objectives against which the BPNP has been assessed;
- The appraisal of alternative approaches for the BPNP;
- The likely significant environmental effects of the BPNP;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the BPNP; and
- The next steps for the BPNP and accompanying SEA process.

## Assessment of alternative approaches for the BPNP

### Assessment of housing sites for allocation through the BPNP

The BPNP is being prepared in the context of the Torbay Local Plan, which was adopted in December 2015<sup>1</sup>. The Local Plan, which covers the period 2012 to 2030, provides a framework for how future development across Torbay will be planned and delivered. Over the 18 year Local Plan period, the Local Plan expects the provision of at least 660 new homes and requires 2,700 square metres of employment land to be delivered in the area covered by the Neighbourhood Plan. These are to be allocated through the Neighbourhood Plan.

To support this process, the Torbay Local Plan has identified a pool of 'potential development sites for consideration' for allocations in the Brixham Peninsula area. This provides a selection of sites for housing development which amounts to a capacity of 790 dwellings in Brixham over the plan period.

In addition to the housing sites identified in the Local Plan, the BPNP Steering Group has identified a number of further sites which it is viewed should also be considered as potential sites for allocating for housing through the BPNP.

24 sites in total were therefore considered for the Neighbourhood Plan, comprising 17 in Brixham town and seven in the villages of Churston, Galmpton and Broadsands. To support the consideration of the suitability of these sites, the SEA process has undertaken an appraisal of the key environmental constraints present at each of the sites and potential effects that may arise. The findings of the appraisal are presented in Section 3.3.2 of this Environmental Report.

### Assessment of employment sites for allocation through the BPNP

In relation to employment sites, the Torbay Local Plan has identified a pool of 'sources of employment land' in Torbay. Two sites located in the Neighbourhood Plan area are listed. The first is the Northfields Trading Estate, which is listed as a focus for refurbishment and environmental improvements and '*qualitative improvements to upgrade existing provision*'. The second is Oxen Cove and Freshwater Cove, which is listed as a mixed use harbourside development with a focus on marine employment uses.

Whilst supporting these provisions, the Neighbourhood Plan Forum has been keen to consider further sites for potentially allocating through the BPNP. This is in line with the Local Plan, which highlights that Torbay Council will, in principle, support proposals that deliver employment space and high value jobs, and indicates that Neighbourhood Plans are able to allocate additional employment sites.

In light of this, four sites have been considered for employment uses through the Neighbourhood Plan development process.

To support the consideration of the suitability of these sites, the SEA process has undertaken an appraisal of the key environmental constraints present at each of the sites and potential effects that may arise. In this context, as for the potential housing sites, these have been considered in relation to the SEA Framework of objectives and decision making questions developed during SEA scoping and the baseline information.

The findings of the appraisal are presented in Section 0 of this Environmental Report.

### Assessment of alternative development strategies for the Neighbourhood Plan

#### *Development on previously developed land vs greenfield development*

At the outset of the BPNP's development process, a key intention of the Neighbourhood Plan has been to shape new development within the Neighbourhood Plan area. In this context two potential options were considered, namely whether to 1) focus development on existing previously developed

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<sup>1</sup> Torbay Council (December 2015) Torbay Local Plan 2012 to 2030  
<http://www.torbay.gov.uk/council/policies/planning-policies/local-plan/new-local-plan/>



'brownfield' sites in Brixham, Churston, Galmpton or Broadsands or 2) widen the scope of the Neighbourhood Plan to consider development on previously undeveloped 'greenfield' sites in the Neighbourhood Plan area.

To support decision making on this element of the BPNP, two options were considered as reasonable alternatives through the SEA process.

The two options were as follows:

- Option 1: Facilitate the development of greenfield sites in the Neighbourhood Plan area; and
- Option 2: Focus development on previously developed sites in the Neighbourhood Plan area.

Table 3.24 in the Environmental Report presents the findings of the appraisal of Option 1 and Option 2 outlined above.

### Assessment of alternative options relating to size of housing allocations

Policy SDB1 of the Torbay Local Plan highlights that the Brixham Peninsula is expected to provide sufficient land to enable delivery of 660 new homes over the 18-year period from 2012 to 2030. The Local Plan further determined that 234 windfall sites could be relied on to come forward during this period. As of late December 2016 there were 316 commitments (planning permission in place which are considered "deliverable").

As such, the Neighbourhood Plan is required to allocate sites for at least 123 new homes.

To provide input into this element, two options have been considered to consider what size and form new housing sites should take. As such, the SEA process has considered two broad options linked to the size of housing allocations to be taken forward through the Neighbourhood Plan to deliver the housing numbers set out for Neighbourhood Plan area by the Local Plan. The two options are as follows:

- **Option 1:** Delivery of the remaining Torbay Local Plan housing allocation for the Brixham Peninsula through a limited number of larger sites (of over c.50 dwellings); and
- **Option 2:** Delivery of the Torbay Local Plan housing allocation for the Brixham Peninsula through a larger number of smaller sites (of under c.50 dwellings), which are likely to be dispersed across the Neighbourhood Plan area.

Table 3.25 in the Environmental Report presents the findings of the appraisal of Option 1 and Option 2 outlined above.

In light of consultation undertaken to date on the Neighbourhood Plan, and consideration of the assessment findings above, the BPNP Steering Group took the decision to focus development on brownfield sites in Brixham town and the villages rather than allocating land for housing and employment on greenfield sites. In relation to housing allocations, the decision was also taken to allocate housing for the remaining Torbay Local Plan requirement on smaller sites spread amongst the settlements of the Brixham Peninsula.

This was with the aim of:

- Supporting the regeneration of key parts of the Neighbourhood Plan area;
- Facilitating enhancements to the existing public realm, townscape and villagescape of the Neighbourhood Plan area;
- Protecting sensitive landscape character in the vicinity of Brixham town, Churston, Galmpton and Broadsands; and
- Rejuvenating existing areas of derelict and underutilised land in the Neighbourhood Plan area.

In response to this preferred development strategy, eleven sites have been allocated for housing in the Neighbourhood Plan area, as follows:

**Brixham town:**

- Town Centre Car Park (25 dwellings);
- St Mary's/Old Dairy (25 dwellings);
- St Kilda (12 dwellings);
- Northcliff Hotel (15 dwellings);
- Torbay Industrial Estate (15 dwellings);
- Oxen Cove and Freshwater (10 dwellings);
- Brixham Police Station (7 dwellings);
- Former Jewson (20 dwellings; and
- Castor Road (10 dwellings).

**Churston, Galmpton and Broadsands:**

- Waterside Quarry(10 dwellings); and
- Knapman's Yard (6 dwellings).

## Assessment of the current version of the BPNP

Utilising the SEA Framework of objectives and appraisal questions developed during the earlier scoping stage of the SEA, the SEA process assessed the policies put forward through the current Submission version of the BPNP. The Environmental Report has presented the findings of the appraisal under the following sustainability themes:

- Biodiversity and geodiversity;
- Climate change;
- Historic environment and landscape;
- Land, soil and water resources;
- Population and community;
- Health and wellbeing; and
- Transportation.

The assessment has concluded that the current version of the BPNP is likely to lead to **significant positive effects** in relation to the 'population and community' and 'health and wellbeing' sustainability themes. These benefits largely relate to the carefully targeted spatial approach proposed by the current version of the BPNP, the focus on enhancing the vitality of the Neighbourhood Plan area and the BPNP's impetus on protecting and enhancing open space and green infrastructure networks. In addition, the allocations proposed through the Neighbourhood Plan will enable significant enhancements to be made to the quality of townscapes and the setting of the historic environment at key locations of existing poor public realm in the Brixham Peninsula, leading to **significant positive effects** in relation to the 'historic environment and landscape' theme.

In relation to the 'biodiversity and geodiversity' sustainability theme, the scope and scale of the proposed policy approaches relating to the natural environment will help ensure that wide ranging benefits in relation to this theme are secured through the Neighbourhood Plan. Whilst the delivery of the allocations through the BPNP will inevitably lead to some minor localised adverse effects in relation to biodiversity, the approach initiated by the Neighbourhood Plan will both limit the potential magnitude of adverse effects and secure enhancements. The focus on allocating sites on previously developed land will also bring positive effects in relation to the 'land, soil and water resources theme' through limiting the development of agricultural land, including land classified as the Best and Most Versatile

Agricultural Land. It will also help support the remediation of contaminated land at a number of locations.

The current version of the BPNP will initiate a number of beneficial approaches regarding the 'transportation' and 'climate change' sustainability themes. However these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.

## Next steps

The BPNP and this Environmental Report has been submitted to Torbay Council. Torbay Council will consider whether the plan is suitable to go forward to Independent Examination in terms of the BPNP meeting legal requirements and its compatibility with the Local Plan.

If the subsequent Independent Examination is favourable, the BPNP will be subject to a referendum, organised by Torbay Council. If more than 50% of those who vote agree with the plan, then it will be passed to the Torbay Council with a request it is adopted. Once adopted, the BPNP will become part of the Development Plan for Brixham, Churston, Galmpton and Broadsands.

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# 1. Introduction

## 1.1 Background

AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Brixham Peninsula Neighbourhood Plan (BPNP).

The BPNP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2012. The Neighbourhood Plan area, which includes the town of Brixham and the villages of Churston, Galmpton and Broadsands (Figure 1.1), is being prepared in the context of the Torbay Local Plan (2012 – 2030).

The BPNP was submitted to Torbay Council in July 2017.

Key information relating to the BPNP is presented in **Table 1.1**.

**Table 1.1: Key facts relating to the Brixham Peninsula Neighbourhood Plan**

Name of Responsible Authority	Brixham Neighbourhood Forum
Title of Plan	Brixham Peninsula Neighbourhood Plan (BPNP)
Subject	Neighbourhood Plan
Purpose	The Brixham Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Neighbourhood Planning (General) Regulations 2012. The plan will, when 'made', conform with the Torbay Local Plan
Timescale	To 2030
Area covered by the plan	The communities of Brixham, Churston, Galmpton and Broadsands ( <b>Figure 1.1</b> )
Summary of content	The BPNP will set out a vision, strategy and range of policies for the Neighbourhood Plan area. <b>Section 2</b> below presents the vision and aims of the Neighbourhood Plan
Plan contact point	Adam Billings, Neighbourhood Plan Vice Chair

## 1.2 SEA explained

The BPNP has been screened in as requiring an SEA.

SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the BPNP seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.

The SEA has been prepared in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive<sup>2</sup>.

The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.

In line with the SEA Regulations this Environmental Report must essentially answer four questions:

- What is the scope of the SEA?
- What has plan-making/SEA involved up to this point?
  - 'Reasonable alternatives' must have been appraised for the plan.
- What are the appraisal findings at this stage?
  - i.e. in relation to the draft plan.
- What happens next?

These questions are derived from Schedule 2 of the SEA Regulations, which present 'the information to be provided within the report'. **Table 1.2** presents the linkages between the regulatory requirements and the four SEA questions.

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<sup>2</sup> Directive 2001/42/EC

## 1.3 Structure of this Environmental Report

This document is the Environmental Report for the Submission version of the BPNP and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations.

Each of the four questions is answered in turn within this report, as follows:

**Table 1.2: Questions that must be answered by the Environmental Report in order to meet regulatory<sup>3</sup> requirements**

Environmental Report question	In line with the SEA Regulations, the report must include... <sup>4</sup>
What is the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
What is the sustainability 'context'?	<ul style="list-style-type: none"> <li>The relevant environmental protection <b>objectives</b>, established at international or national level</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
<b>What's the scope of the SEA?</b>	<ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
What are the key issues & objectives?	<ul style="list-style-type: none"> <li>Key <b>problems/issues</b> and <b>objectives</b> that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> <li>Outline reasons for selecting the <b>alternatives</b> dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with <b>alternatives</b></li> <li>Outline reasons for selecting the preferred approach in-light of <b>alternatives</b> appraisal/a description of how environmental objectives and considerations are reflected in the draft plan.</li> </ul>
What are the assessment findings at this stage?	<ul style="list-style-type: none"> <li>The likely significant effects associated with <b>the Submission version of the plan</b></li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing <b>the Submission version plan</b></li> </ul>
What happens next?	<ul style="list-style-type: none"> <li>The next steps for plan making/SEA process.</li> </ul>

<sup>3</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>4</sup> NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

## 2. The Scope of the SEA

### 2.1 SEA Scoping Report

The SEA Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.<sup>5</sup> These authorities were consulted on the scope of the BPNP SEA in March 2015.

The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:

- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
- Baseline data against which the Neighbourhood Plan can be assessed;
- The key sustainability issues for the Neighbourhood Plan; and
- An ‘SEA Framework’ of objectives against which the Neighbourhood Plan can be assessed.

Baseline information (including the context review and baseline data) is presented in **Appendix A**.

Comments received on the Scoping Report, and how they have been considered and addressed, are presented in **Table 2.1**.

**Table 2.1: Consultation responses received on the SEA Scoping Report**

Consultation response	How the response was considered and addressed
<b>Natural England</b> <b>Laura Horner, Lead Adviser Plans Devon, Cornwall &amp; Isles of Scilly Area Team</b>	
The Local Planning Authority proposes to implement mitigation measures for recreational pressures on calcareous grassland at Berry Head. Until these measures are in place, residual Likely Significant Effects will remain and therefore the Brixham Neighbourhood Plan cannot proceed. The need for the measures lies with the Local Plan not the Neighbourhood Plan.	Comment noted and fed back to the Local Plan development team.
Mitigation measures for Greater Horseshoe Bat features are either contained within the Local Plan Policy or will be implemented by the Local Plan before a Neighbourhood Plan can proceed.	Comment noted and fed back to the Local Plan development team.
Where a neighbourhood plan could potentially affect a European protected site, it will be necessary to screen the plan in relation to the Conservation of Habitats and Species Regulations (2010), as amended (the ‘Habitats Regulations’). A screening exercise should be undertaken if there is any doubt about the possible effects of the plan on European protected sites. This will be particularly important if a neighbourhood plan is to progress before a local plan has been adopted and/or the neighbourhood plan proposes development which has not be assessed and/or included in the Habitats Regulations Assessment for the local plan.	Noted. A Habitats Regulations Assessment screening opinion accompanies the Regulation 14 version of the BPNP.

<sup>5</sup> In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme.’



Consultation response	How the response was considered and addressed
<p><b>Historic England</b> <b>David Stuart, Historic Places Adviser South West</b></p>	
<p>There are 3 designated heritage assets in the area At Risk on the national Heritage At Risk Register:</p> <ul style="list-style-type: none"> <li>• The Brixham Town Conservation Area</li> <li>• Ashhole Cavern Scheduled Ancient Monument</li> <li>• Grade II* Lupton House (Gramercy Hall School)</li> </ul>	<p>Key issues have been updated to reflect comment.</p>
<p>We would suggest that these should be identified within the schedule of Key Environmental Issues in Section 5. Sustainability Issues and problems.</p>	
<p>In the same section, development could impact on heritage assets and these should be considered along with the other receptors identified.</p>	<p>Key issues have been updated to reflect comment.</p>
<p>The Conservation Area is At Risk for a range of issues which your authority has identified in its completion of the Conservation Area survey for the At Risk Register. These can be used to inform the schedule of Key Environmental Issues.</p>	<p>The 'at risk' nature of the Brixham Town Conservation Area has been acknowledged through the assessment of plan proposals and alternatives.</p>
<p>We suggest that the full range of possible heritage asset types At Risk be used as an Indicator against High level Objective 5 in Table 6.1: Sustainability Appraisal Framework rather than just Grade I and II Listed Buildings as intimated. This is also a somewhat negative indicator and we would therefore suggest that thought be given to how more positive indicators could be devised to respond to the "enhance" aspect of this objective eg the removal of a heritage asset from the At Risk Register.</p>	<p>The SEA process has considered the positive opportunities for enhancing the fabric and setting of the historic environment.</p>
<p>We only have access to a draft Neighbourhood Plan from April last year which identifies proposed housing numbers of some 350. However, the Scoping Report suggests that this figure is actually around 800 (or as many as 1320?) plus employment floorspace. The amount will influence the per site level, form and possible locations for any development proposed and clarity will be necessary to ensure that individual and cumulative impacts can be properly identified and assessed.</p>	<p>The latest version of the Neighbourhood Plan seeks to allocate in the region of 130 dwellings. This reflects committed sites, recent completions and Local Plan windfall calculations.</p>
<p><b>Environment Agency</b></p>	
<p>No comments were received on the Scoping Report from the Environment Agency following scoping consultation.</p>	

## 2.1.1 Key sustainability issues

Drawing on the review of the sustainability context and baseline, the SEA Scoping Report was able to identify a range of sustainability issues that should be a particular focus of SEA. These issues are as follows:

### Key social issues

- Brixham Peninsula has a large number of older people, many of whom are living alone, raising issues over provision of suitable and accessible homes for older people.
- There is a recognised need to promote healthy eating in Brixham Peninsula. This can be assisted through provision of infrastructure such as allotment space and areas for farmer markets.
- There is high need for affordable housing for both the young and the elderly.
- Fear of crime is high in Brixham Peninsula
- There are localised areas of deprivation
- Unbalanced population (low levels of 20-30 years old)
- Neglected and run down housing stock
- Lack of sports facilities

### Key economic issues

- Lack of accessibility to well-paid and skilled jobs
- Limited transport choices available to many residents
- Torbay as a whole experiences low income levels.
- High rates of unemployment in certain parts of the plan area
- High vacancy rates (industrial buildings)
- Under-used and derelict ex-industrial buildings

### Key environmental issues

- New development in the Brixham Peninsula has the potential to have impacts on the internationally designated South Hams SAC and Lyme Bay and Torbay cSAC and the nationally designated Berry Head to Sharkham Point SSSI, Berry Head National Nature Reserve, South Devon AONB, as well as the MCZs present in the wider area.
- New development has the potential to have impacts on features and areas of historic environment interest and their setting
- Some areas of the Brixham Peninsula suffer from poor public realm
- There are three designated heritage assets in the area deemed to be 'at risk' on the national Heritage at Risk Register in the Neighbourhood Plan area:
  - The Brixham Town Conservation Area
  - Ashhole Cavern Scheduled Ancient Monument
  - Grade II\* Lupton House (Gramercy Hall School)
- An AQMA has been designated at Bolton Cross

- Energy inefficient building stock
- Low levels of renewable energy use
- Areas at risk of flooding

## 2.2 SEA Framework

These issues were then translated into an 'SEA Framework'. This SEA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SEA framework for the BPNP is presented below.

**Table 2.2: SEA Framework for the Brixham Peninsula Neighbourhood Plan**

SEA theme	Objectives
Biodiversity and Geodiversity	<ul style="list-style-type: none"> <li>• Protect and enhance habitats and species</li> </ul>
Climate change	<ul style="list-style-type: none"> <li>• Reduce non-renewable energy consumption and greenhouse gas emissions</li> <li>• Reduce vulnerability to flooding and sea level rise</li> <li>• Reduce the vulnerability of the economy to climate change</li> </ul>
Historic Environment and Landscape	<ul style="list-style-type: none"> <li>• Maintain and enhance the historic environment</li> <li>• Protect and enhance landscape and townscape</li> <li>• Value and protect diversity and local distinctiveness including rural ways of life</li> </ul>
Land, Soil and Water Resources	<ul style="list-style-type: none"> <li>• Minimise land, water, air, light and noise pollution</li> <li>• Reduce waste generation and increase materials efficiency</li> <li>• Keep water consumption within local carrying capacity limits</li> <li>• Promote conservation and wise use of land</li> </ul>
Population and Community	<ul style="list-style-type: none"> <li>• Help make suitable and affordable housing available to everyone</li> <li>• Provide everyone with opportunities for education and training</li> <li>• Reduce crime and fear of crime</li> <li>• Promote stronger and more vibrant communities</li> <li>• Increase access to and participation in cultural activities</li> <li>• Meet local needs locally</li> <li>• Give everyone in Brixham access to work opportunities</li> <li>• Reduce poverty and income inequality</li> <li>• Promote the essential need for green infrastructure</li> <li>• Contribute to the regeneration and quality and diversity of the tourism industry</li> <li>• Support the fishing industry</li> </ul>
Health and Wellbeing	<ul style="list-style-type: none"> <li>• Improve health of all communities in Brixham Peninsula</li> <li>• Reduce health inequality</li> <li>• Promote healthy lifestyles</li> </ul>
Transportation	<ul style="list-style-type: none"> <li>• Help everyone access basic services easily, safely and affordably</li> <li>• Make public transport, cycling and walking easier and more attractive</li> <li>• Reduce the need /desire to travel by car</li> </ul>

## 3. What has plan making / SEA involved to this point?

### 3.1 Introduction

In accordance with the SEA Regulations the Environmental Report must include...

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this section explains how preparation of the current Submission version of the BPNP has been informed by an assessment of alternative locations for housing allocations in the Neighbourhood Plan area.

### 3.2 Overview of plan making / SEA work undertaken since 2013

Plan-making for the BPNP has been underway since 2013. Initial work incorporated a number of informal and formal consultation exercises carried out by the Neighbourhood Plan Forum, including on the scope of the Neighbourhood Plan.

A significant number of consultation events have since been carried out for the Neighbourhood Plan. This has included a range of exhibitions, public meetings and questions and answer sessions as well as workshops.

The following sections discuss the evolution of the BPNP in association with the SEA process.

### 3.3 Assessment of reasonable alternatives for the Neighbourhood Plan

A key element of the SEA process is the appraisal of 'reasonable alternatives' for the BPNP. The SEA Regulations<sup>6</sup> are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.

The following sections therefore describe how the SEA process to date has informed the preferred development strategy for the Neighbourhood Plan area and potential locations for proposed development. Specifically, this chapter explains how the BPNP's development strategy has been developed in terms of site allocations for housing and the consideration of alternative spatial strategies.

#### 3.3.1 Context for site allocations provided by the Torbay Local Plan

The BPNP is being prepared in the context of the Torbay Local Plan, which was adopted in December 2015<sup>7</sup>. The Local Plan, which covers the period 2012 to 2030, provides a framework for how future development across Torbay will be planned and delivered.

The Local Plan sets out a spatial strategy for Torbay through setting out provisions for three areas: Torquay, Paignton and Brixham. The Brixham Peninsula Neighbourhood Plan covers the latter area.

With Torquay and Paignton, the Local Plan has identified a pool of potential sites for the delivery of housing in the Brixham area. Based on a Strategic Housing Land Availability Assessment, this provides

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<sup>6</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>7</sup> Torbay Council (December 2015) Torbay Local Plan 2012 to 2030

<http://www.torbay.gov.uk/council/policies/planning-policies/local-plan/new-local-plan/>

a selection of sites for development which amounts to a capacity of 790 dwellings in Brixham over the plan period. **Table 3.1** sets out the capacities of key broad locations in the area.

**Table 3.1: Breakdown of Local Plan housing capacities in the Brixham Peninsula**

Location	Number
Brixham Town Centre and Waterfront	65
Brixham Urban Fringe and AONB	260
Elsewhere within Brixham Peninsula	230
Small windfalls <6 dwellings	235
<b>Total</b>	<b>790</b>

Whilst the Local Plan identifies potential locations for delivering 790 houses in the Brixham area, it also sets out the minimum housing and employment provision it expects to be delivered during the plan period.

In this context over the 18 year Local Plan period (2012/13 to 2029/30), the Local Plan requires the provision of at least 660 new homes and requires 2,700 square metres of employment land to be delivered. This is the minimum trajectory to ensure that a rolling 5 year land supply is maintained.

### 3.3.2 Assessment of potential locations for site allocations: Housing

As highlighted above, the Torbay Local Plan has identified a pool of 'potential development sites for consideration' for allocations in the Brixham Peninsula area. Based on the SHLAA, this provides a selection of sites for development which amounts to a capacity of 790 dwellings in Brixham over the plan period.

In addition to the sites identified in the Local Plan, the BPNP Steering Group has identified a number of further sites which it is viewed should also be considered as potential sites for allocation through the BPNP. 22 sites in total were therefore considered by the Steering Group, comprising 15 in Brixham town and seven in the villages of Churston, Galmpton and Broadsands.

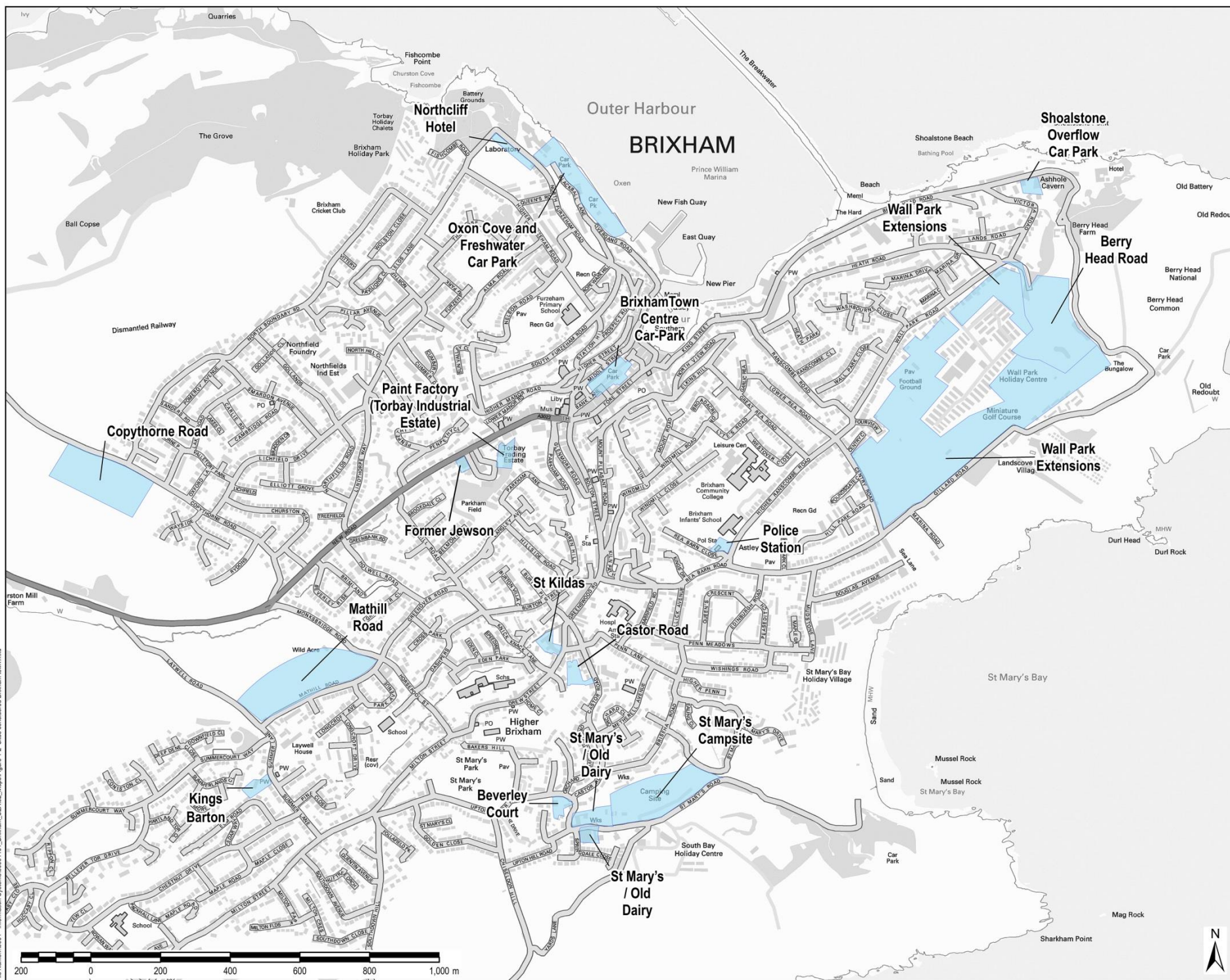
To support the choice of sites for allocating through the Neighbourhood Plan, the 22 sites were subject to an independent site assessment undertaken by AECOM with a view to examining the suitability, availability and achievability of the sites. The findings are presented in a site assessment report (July 2017), which accompanies the current Submission BPNP.

The locations of the 22 sites considered are presented in the two maps below.

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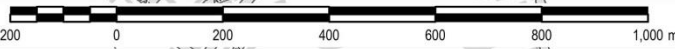
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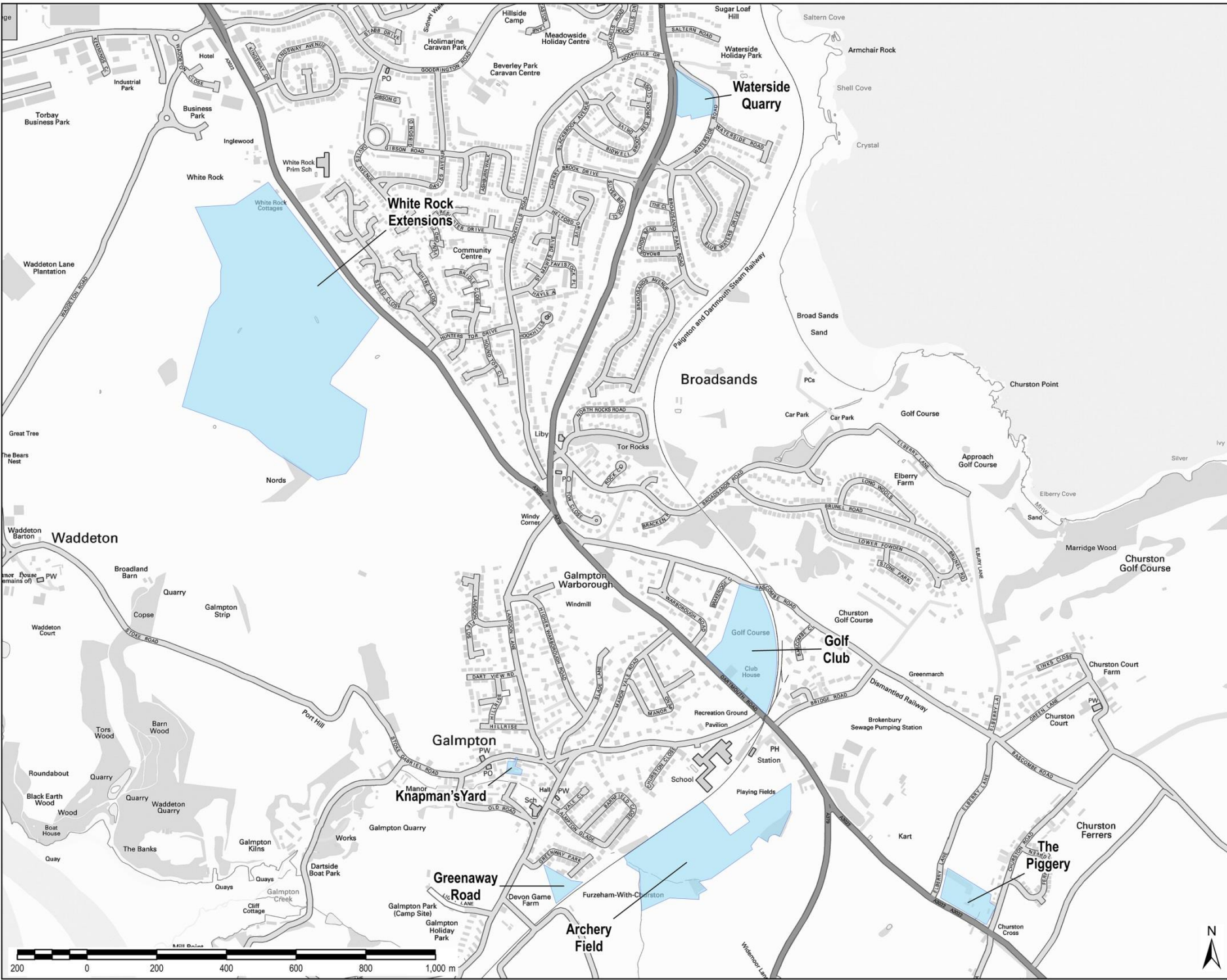
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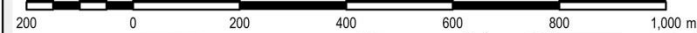
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To support the consideration of the suitability of these sites, the SEA process has undertaken an appraisal of the key environmental constraints present at each of the 22 sites and potential effects that may arise. In this context the sites have been considered in relation to the SEA Framework of objectives and decision making questions developed during SEA scoping (Section 2.2) and the baseline information.

The tables below present a summary of this appraisal, and provide an indication of each site's sustainability performance in relation to the seven SEA themes.

**Table 3.2: Site 1: Berry Head Road**

SEA theme	Commentary, Site 1: Berry Head Road
<b>Biodiversity and Geodiversity</b>	<p>The site is located less than 50m from three nationally and internationally designated biodiversity sites, including the Berry Head to Sharkham Point Site of Special Scientific Interest (SSSI), the South Hams Special Area of Conservation (SAC) and Berry Head National Nature Reserve (NNR).</p> <p>SSSI Impact Risk Zones are a dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs. In relation to the Berry Head to Sharkham Point SSSI, the site is within an SSSI Impact Risk Zone for 'all development'. In this context, the delivery of c.50 dwellings on this site raises the possibility of adverse effects on the SSSI.</p> <p>The site contains no areas of Biodiversity Action Plan (BAP) Priority Habitat, although the site adjoins areas of deciduous woodland and lowland calcareous grassland. The site also contains two trees with Tree Preservation Orders (TPOs).</p> <p>Development on the site is likely to adversely affect protected sites and/or protected species, due to its proximity to statutory designated sites.</p>
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding; with the site located entirely within Flood Zone 1. A small proportion of the site (approx. 10%) to the south is at risk of surface water flooding; development would need to ensure this risk is managed.</p> <p>The site is not located in an area to take advantage of sustainable modes of transport, with frequent bus services located in Brixham town centre, approx. 1.8km from the site (though it is recognised that there are services approx. 800m from the site, though these are less frequent). It is considered that development on this site is likely to result in increases in car use, and an associated increase in GhG emissions.</p>
<b>Historic Environment and Landscape</b>	<p>The site is located within the South Devon Area of Outstanding Natural Beauty (AONB). The site is currently well screened, however it is considered that development on this site would not relate well to its surroundings and would result in adverse effects on the AONB. As such it is likely that development of the site would lead to significant effects on landscape character in the area.</p> <p>There are no sites of historic interest within the site, though the site is within approx.. 200m of one listed structure, a Grade II listed boundary stone; as well as a scheduled monument, the Old Redoubt and later Victorian Rifle Range Target. Both are located to the south east of the site. Given the nature and locations of these assets, effects on these sites are unlikely to be significant.</p>
<b>Land, Soil and Water Resources</b>	<p>It is not possible to confirm if the site will lead to a loss of Best and Most Versatile Agricultural Land, as the boundary between Grade 3 and Urban is unclear; in addition, it is not possible to differentiate between Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such), as no recent land classification has been undertaken.</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>
<b>Population and Community</b>	<p>Located at some distance from amenities in Brixham town centre, the site has poor access to key services, facilities and frequent public transport links.</p> <p>The site is located on the edge of the town, and development on this site may not be accessible or inclusive. Consequently, it may not support community cohesion.</p>



SEA theme	Commentary, Site 1: Berry Head Road	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes, with a NNR located adjacent to the site. In addition, Shoalstone Outdoor Swimming Pool is approx. 600m away. This will support the health and wellbeing of residents of the site.</p> <p>The site is not easily accessible to health care facilities, being located 1.6km from a Primary Healthcare Centre.</p>	
<b>Transportation</b>	<p>The site is not currently accessible for vehicles, but access could be gained though Berry Head Road. There is the possibility of access via a private driveway to the northwest of the site. However it is considered that the site would result in an increase in car use, due to the distance from key services, facilities and frequent public transport links.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects


**Table 3.3: Site 2: Beverley Court**

SEA theme	Commentary, Site 2: Beverley Court	
<b>Biodiversity and Geodiversity</b>	<p>The site is located 800m from three statutory designated sites, including the Berry Head to Sharkham Point SSSI, South Hams SAC and Berry Head NNR. The site also contains no areas of BAP Priority Habitat.</p> <p>The site is not within an SSSI Impact Risk Zone for residential development within an urban area. As such allocations at this site are unlikely to have effects on the SSSI.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding. The site is also located entirely within Flood Zone 1.</p> <p>The site is located in an area to take advantage of sustainable modes of transport, with an hourly bus services located approx. 100m from the site. This will support the use of lower carbon modes of travel.</p>	
<b>Historic Environment and Landscape</b>	<p>The site is located close to the Grade II listed 1, 2 and 3, St Marys Road; development may therefore adversely affect the setting of these, unless the development's design and layout is sensitive to the setting of the listed buildings.</p> <p>The site is located close to the South Devon AONB. However development on the site would relate well to its surroundings, and is not considered likely to result in adverse effects on the AONB.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, nor is the site located in a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site is located with good proximity to local facilities, being located within 100m of town bus routes and located relatively close to shops on Castor Road. The site also has good access to the services and facilities in Brixham town centre.</p> <p>The site is located within an existing residential area, and is considered to be an infill site.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes, as well as St Mary's Park. This would support the health and wellbeing of residents on the site.</p> <p>The site is accessible to health care facilities, being located 750m from a Primary Healthcare Centre.</p>	
<b>Transportation</b>	<p>The site is currently accessible for vehicles with direct existing access to Upton Manor Road. It is considered that the site would promote the use of sustainable modes of travel, due to the distance from key services, facilities and frequent public transport links.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.4: Site 3: Brixham Town Centre Car Park**

SEA theme	Commentary, Site 3: Brixham Town Centre Car Park	
<b>Biodiversity and Geodiversity</b>	<p>The site is located approx. 1km from two statutory designated sites, including Berry Head to Sharkham Point SSSI and South Hams SAC; as well as 1.2km from Berry Head NNR. The site is not within an SSSI Impact Risk Zone for residential development within an urban area. As such it is unlikely that the site will have negative effects on the SSSI.</p> <p>The site contains no areas of BAP Priority Habitat. Development on the site is considered to have limited effects on biodiversity.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, a large proportion of the site sits within Flood Zone 3 ('high probability' flood zone, where there is 1 in 100 or greater annual probability of flooding) associated with the Lupton watercourse and Higher Brixham watercourse. A large proportion of the site also at high risk from surface water flooding. A sequential test for the site is currently being carried out.</p> <p>The site is located in the centre of Brixham, highly accessible to all services and facilities in Brixham town centre, and adjacent to Town Square bus stop that has frequent buses to surrounding towns. Therefore development at this location will support lower carbon modes of travel.</p>	
<b>Historic Environment and Landscape</b>	<p>In terms of historic environment designations, the site is located within the Brixham Town Conservation Area, and is adjacent to one Grade II listed building (1, Paradise Place) to the eastern corner of the site. Development would need to be sensitive to these; however, this is not necessarily viewed as an adverse effect, as development at this location offers significant opportunities for enhancements to the public realm and setting of the historic environment when compared to its current use as a car park. This is particularly relevant given the conservation area has been deemed to be 'at risk' by Historic England.</p> <p>Due to its distance from the site, development would not have an effect on South Devon AONB.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, nor is the site located within a Groundwater Source Protection Zone. Development of the site has the potential to reduce land contamination at this location.</p>	
<b>Population and Community</b>	<p>The site is located in the centre of the town, highly accessible to all services and facilities in Brixham town centre, and adjacent to Town Square bus stop that has frequent buses to surrounding towns.</p> <p>As a prominent and accessible town centre location, mixed use development at this site would offer significant possibilities for the town centre; this would support the wider regeneration of Brixham and result in positive effects for the population and community, as well as for tourism to the town.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes that would bring a range of benefits for the health and wellbeing of residents.</p> <p>The site is accessible to health care facilities, being located 250m from a Primary Healthcare Centre.</p>	
<b>Transportation</b>	<p>The site is currently accessible for vehicles; current access is through Bank Lane, which joins Market Street. It is considered that the site would support non-car use, given its highly accessible location from key services, facilities and frequent public transport links.</p> <p>Development on the site though would however result in the loss of car parking in the town centre, and subsequent reduction in traffic within the vicinity. It is hence appropriate that development on this site is accompanied by higher density car parking (e.g. multi-storey) to offset the reduction in the footprint of land area used for car parking as proposed in the Town Centre Master Plan.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.5: Site 4: Copythorne Road**

SEA theme	Commentary, Site 4: Copythorne Road	
<b>Biodiversity and Geodiversity</b>	<p>The site is located approx. 2km from two statutory designated sites, Berry Head to Sharkham Point SSSI and South Hams SAC; as well as approx. 2.2km from Berry Head NNR.</p> <p>The site is not within an SSSI Impact Risk Zone for residential development; however, it is within an impact zone for all development outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures. Located on farmland on the edge of Brixham, this category would apply to the site. Development therefore raises the possibility of adverse effects on the Berry Head to Sharkham Point SSSI without avoidance and mitigation measures.</p> <p>The site contains no areas of BAP Priority Habitat.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding; with the site located entirely within Flood Zone 1. A small strip of the site to the south east, as well as Copythorne Road is at risk of surface water flooding; development would need to ensure this risk is managed.</p> <p>Despite being out of the town centre, the site is located within a reasonable distance to sustainable modes of transport, with frequent bus services located on New Road, 450m south east of the site. There are also a number of other local facilities within a reasonable distance; though access to key services in the town centre are a greater distance away. This in combination with the potential scale of the development has the potential to encourage car use, and thus result in an increase in GHG emissions.</p>	
<b>Historic Environment and Landscape</b>	<p>Development at this location would comprise an extension to the existing built up area of Brixham into the AONB, within which the site is located. Development on the site therefore has the potential to result in adverse effects on the AONB. In terms of local views, development would affect views from properties on Copythorne Road, Wayside and Wayside Close.</p> <p>There are no sites of historic interest within or adjacent to the site.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is located on Grade 2 and Grade 3a agricultural land, therefore development on this site would result in a loss of Best and Most Versatile Agricultural Land. This is considered to be a negative effect, as this is land which is the most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses<sup>8</sup>. The site is not located in a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>Located at some distance from amenities in Brixham town centre, it has poor access to key services, facilities and schools, though it is recognised that number of other local facilities are within a reasonable distance from the site.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes. In addition recreation facilities are a reasonable distance from the site, on Boundary Road, approx. 450m to north east. This would support the health and wellbeing of residents. The site is however located 1km from public open space at Ferrers Green.</p> <p>The site is not easily accessible to health care facilities, being located 1.6km from a Primary Healthcare Centre.</p>	
<b>Transportation</b>	<p>The site is accessible from Copythorne Road.</p> <p>It is considered that the site would result in an increase in car use, due its location on the edge of the Brixham town, and the relative distance from amenities in Brixham town centre. It has poor access to key services, facilities and schools, though it is recognised that number of other local facilities are within a reasonable distance from the site.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect 

<sup>8</sup> Natural England (2012); Natural England Technical Information Note TIN049 - Agricultural Land Classification: protecting the best and most versatile agricultural land.

SEA theme	Commentary, Site 4: Copythorne Road	
Neutral/no effect		Uncertain effects

**Table 3.6: Site 5: King's Barton**

SEA theme	Commentary, Site 5: Kings Barton	
<b>Biodiversity and Geodiversity</b>	The site is located approx. 1.5km from three statutory designated sites, including Berry Head to Sharkham Point SSS, South Hams SAC and Berry Head NNR. The site is not within an SSSI Impact Risk Zone for residential development; as such development at this site is unlikely to have effects on the SSSI. The site contains no areas of BAP Priority Habitat.	
<b>Climate change</b>	In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding. The site is located entirely within Flood Zone 1.  While located out of the town centre, the site is located within a reasonable distance to sustainable transport links, with frequent bus services located on Milton Street, approx. 300m to south. There are also a number of other local facilities within a reasonable distance, though key services in the town centre are a greater distance away. However the location of the site is unlikely to stimulate a significant degree of car use, and thus not result in an increase in GHG emissions.	
<b>Historic Environment and Landscape</b>	The site is not located within an AONB, nor does the site consist of any sites of historic interest within or adjacent to the site. In this respect development on the site would not have significant effects on either landscape character or the historic environment.	
<b>Land, Soil and Water Resources</b>	The site is not located on agricultural land, and the site is not located in a Groundwater Source Protection Zone.	
<b>Population and Community</b>	Located at some distance from amenities in Brixham town centre, the site has poor access to key services and facilities located there, though it is recognised that number of other local facilities are within a reasonable distance from the site.  The site is located within an existing residential area, and is considered to be an infill site.	
<b>Health and Wellbeing</b>	The site is located close to walking and cycle routes and open space and recreation facilities are a reasonable distance from the site, at St Mary's Park, 600m from the site. This will support the health and wellbeing of residents.  The site is not however easily accessible to health care facilities, being located 1.3km from a Primary Healthcare Centre.	
<b>Transportation</b>	The site is accessible from Summer Lane.  It is considered that the site would result in a minor increase in car use, due the distance from amenities in Brixham town centre, it has poor access to key services, facilities and schools, though it is recognised that number of other local facilities are within a reasonable distance from the site.	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.7: Site 6: Mathill Road**

SEA theme	Commentary, Site 6: Mathill Road	
<b>Biodiversity and Geodiversity</b>	<p>The site is located approx. 1.3km from three statutory designated sites, including the Berry Head to Sharkham Point SSSI, South Hams SAC and Berry Head NNR. The site is not within an SSSI Impact Risk Zone for residential development; however, it is within an impact zone for all development outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures. Located on farmland on the edge of Brixham, this category would apply to the site. Consequently, development raises the possibility of adverse effects on the Berry Head to Sharkham Point SSSI without avoidance and mitigation measures.</p> <p>The site contains no areas of BAP Priority Habitat.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding. In this context the site is located entirely within Flood Zone 1.</p> <p>Despite being located out of the town centre, the site is located within a reasonable distance to sustainable modes of transport, with frequent bus services located on New Road, 300m to the north of the site. There are also a number of other local facilities within a reasonable distance, though access to key services in the town centre are a greater distance away. As such, due to its location, development at the site is unlikely to result in a significant increase in car use and stimulate a significant increase in GhG emissions.</p>	
<b>Historic Environment and Landscape</b>	<p>The site does not relate well to the existing development pattern in this part of Brixham, and would be the only development area located on the northern side of Mathill Road. The site is on the boundary of the South Devon AONB, and is in a sensitive location in relation to landscape character. Development on this site would affect the views from the north, which is a sensitive area in terms of the integrity of the AONB.</p> <p>The site is located close to two Grade II listed properties: Sunpark and Hill House Nursing Home; development may therefore affect the setting of these, unless the development's design and layout is sensitive to the setting of the listed buildings.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is located on Grade 2 agricultural land, classified as Best and Most Versatile Agricultural Land. Development on this site would result in a loss of this land.</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>Located at some distance from amenities in Brixham town centre, the site has poor access to key services and facilities located there, though it is recognised that number of other local facilities are within a reasonable distance from the site.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes, and open countryside, which would support the health and wellbeing of residents on the site; in addition open space and recreation facilities are a reasonable distance from the site, at St Mary's Park, 750m to the south. The Primary Healthcare Centre is also located 900m to the east.</p>	
<b>Transportation</b>	<p>The site is accessible from Mathill Road.</p> <p>It is considered that allocations at the site would encourage car use, due the distance from amenities in Brixham town centre (though it is recognised that number of other local facilities are within a reasonable distance from the site).</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.8: Site 7: Northcliff Hotel**

SEA theme	Commentary, Site 7: Northcliff Hotel	
<b>Biodiversity and Geodiversity</b>	<p>The site is located approx. 1.2km from two statutory designated sites, Berry Head to Sharkham Point SSSI and South Hams SAC; as well as 1.6km from Berry Head NNR.</p> <p>The site is not within an SSSI Impact Risk Zone for residential development within an urban area, as such an allocation at the site is unlikely to have negative effects on the SSSI.</p> <p>The site contains no areas of BAP Priority Habitat, although to the north and east of the site the Maritime Cliff and Slope BAP Priority Habitat are located, as well as small areas of Deciduous Woodland.</p> <p>Development on the site is not considered likely to lead to limited effects on biodiversity.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding.</p> <p>The site is located approx. 1km from the centre of Brixham; with no closer local services; furthermore the closest major bus service is within the town centre. However, a local bus service is located 150m from the site that provides a bus route into Brixham. At the scale of development stated (eight dwellings), the site is unlikely to result in a significant increase in car use associated GhG emissions.</p>	
<b>Historic Environment and Landscape</b>	<p>In terms of historic environment designations, the site is located across North Furzeham Road from the Battery Park Conservation Area and a scheduled monument located in Battery Gardens Park. The scheduled monument is a World War Two Emergency Coastal Battery and the remains of a practice battery. Development could therefore have negative effects on the setting of these designations, if not designed sensitively. In contrast, this may not necessarily be viewed as an adverse effect, as development at this location may offer opportunities for enhancements to the setting of the historic environment compared to its current use as a derelict plot of land.</p> <p>The site is located 100m from the South Devon AONB. Development on the site would relate well to its surroundings, and is not considered to result in adverse effects on the AONB.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, and is not located within a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site is located approx. 1km from the centre of Brixham, though a local bus service runs 150m from the site that provides a bus route into the town centre.</p> <p>The site is a prominent spot to the north of town, overlooking Torbay, it is currently a derelict site. Development would support the regeneration of the site and result in positive effects for the population and community.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes, and also adjacent to Stoney Park Allotments and Battery Gardens Park This would bring benefits for the health and wellbeing of residents on the site.</p> <p>The site is not easily accessible to health care facilities, being located 1.2km from a Primary Healthcare Centre.</p>	
<b>Transportation</b>	<p>The site is currently accessible from North Furzeham Road.</p> <p>The site is located approx. 1km from the centre of Brixham; with no closer local services; furthermore the closest major bus service is within the town centre. However, a local bus service is located 150m from the site that provides a bus route into Brixham.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.9: Site 8: Freshwater Car Park and Oxen Cove**

SEA theme	Commentary, Site 8: Freshwater Car Park and Oxen Cove	
<b>Biodiversity and Geodiversity</b>	<p>The site is located approx. 1km from two statutory designated sites, Berry Head to Sharkham Point SSSI and South Hams SAC; as well as approx. 1.3km from Berry Head NNR.</p> <p>The site is not within an SSSI Impact Risk Zone for residential development within an urban area. As such, allocations at this site are unlikely to have effects on the SSSI.</p> <p>The site contains no areas of BAP Priority Habitat; although the site is adjacent to Maritime cliff and slope, as well as intertidal BAP habitats (sand and gravel, and rock platform). However development at this location is unlikely to affect the integrity of these sites.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the majority of the site is located within a Flood Zone 2 and 3, located to the south of the site; while the north of the site is in Flood Zone 1. The majority of the site is not at risk from surface water flood risk, though a very small area is classified as at low risk.</p> <p>The site is located within a reasonable walking distance of Brixham town centre (approx. 700m); with local bus services within 500m.</p>	
<b>Historic Environment and Landscape</b>	<p>In terms of historic environment designations, the site is located within the Brixham Town Conservation Area. Development could therefore have negative effects on the setting of the conservation area, if not designed sensitively. In contrast, this may not necessarily be viewed as an adverse effect, as development at this location may offer significant potential to enhance the quality of the public realm and setting of the historic environment. This is particularly relevant given the conservation area has been deemed to be 'at risk' and the current use of the site as a car park.</p> <p>The site is not located within the South Devon AONB.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, nor is the site located in a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site is located approx. 700m from the centre of Brixham with good links to the town centre.</p> <p>The site is a prominent spot to the north of town, overlooking Torbay, it is currently a car park, and development would support the regeneration of the site; and result in positive effects for the population and community. However, the car park is important for residents, businesses and visitors, and the loss of car parking at this location would have significant effects on existing town centre provision. Furthermore, the site has been allocated for employment land in the Torbay Local Plan.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes, being adjacent to the South West Coast Path. This will support the health and wellbeing of residents on the site.</p> <p>The site is close to the Brixham trawler fishing fleet, and potentially suffers from some noise issues.</p> <p>The site is not easily accessible to health care facilities, being located 1.1km from a Primary Healthcare Centre.</p>	
<b>Transportation</b>	<p>The site is currently accessible from Blackball Lane.</p> <p>The site is located approx. 700m from the centre of Brixham with good access to the town, and as such would not necessarily result in a significant increase in car use.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects



**Table 3.10: Site 9: Police Station**

SEA theme	Commentary, Site 9: Police Station	
<b>Biodiversity and Geodiversity</b>	<p>The site is located approx. 450m from two statutory designated sites, Berry Head to Sharkham Point SSS and South Hams SAC; and 1.1km from Berry Head NNR.</p> <p>In relation to Berry Head to the Sharkham Point SSSI, the site is within an SSSI Impact Risk Zone for development which comprises 10 residential dwellings or more. In this context, the delivery of a larger number of dwellings on this site raises the possibility of adverse effects on the SSSI without avoidance and mitigation measures.</p> <p>The site contains no areas of BAP Priority Habitat.</p> <p>Development on the site is considered to have the potential for adverse effects on the SSSI without avoidance and mitigation measures; though it is acknowledged that effects would likely to be limited.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding.</p> <p>The site is within a reasonable distance to sustainable modes of transport, with frequent bus services located in the town centre, approx. 600m to the north west of the site. The site is unlikely to result in a significant increase in car use, and thus not result in an increase in GHG emissions.</p>	
<b>Historic Environment and Landscape</b>	<p>The site is located approx. 250m from the South Devon AONB. Development on the site would relate well to its surroundings, and is not considered to result in adverse effects on the AONB.</p> <p>The site does not consist of any sites of historic interest within or adjacent to the site.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, nor is the site located in a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site is located with good proximity to local facilities. It is located within 100m of a bus route and located relatively close to services and facilities in Brixham town centre approx. 600m away.</p> <p>The site is located within an existing residential area. Whilst development would lead to the loss of this community facility, the police station is appointment-only to the public, and services could be consolidated elsewhere.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes, as well as Astley Park. This would support the health and wellbeing of residents.</p> <p>The site is accessible to health care facilities, with Brixham Hospital, and the adjacent medical centre, approx. 500m to the north of the site.</p>	
<b>Transportation</b>	<p>The site is currently accessible for vehicles by Rea Barn Close.</p> <p>It is considered that the site would not result in significant car dependence, due to the distance from key services, facilities and public transport links.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.11: Site 10: Shoalstone Overflow Car Park**

SEA theme	Commentary, Site 10: Shoalstone Overflow Car Park	
<b>Biodiversity and Geodiversity</b>	<p>The site is located less than 100m from three statutory designated sites, including Berry Head to Sharkham Point SSSI, South Hams SAC and Berry Head NNR.</p> <p>In relation to the Berry Head to Sharkham Point SSSI, the site is within an SSSI Impact Risk Zone for residential development of 10 units or more. In this context, the delivery of 6 dwellings on this site should not result in any adverse effects on the SSSI. However development on this site should still be undertaken with appropriate environmental management controls to ensure there are no adverse effects on the SSSI, as well as other statutory designated sites.</p> <p>The site is adjacent to woodland, a BAP priority habitat. The site itself contains three trees with Tree Preservation Orders (TPOs), consisting of two Monterey Cypress trees in north of site, and another Monterey Cypress on western boundary of site.</p> <p>Development on the site could have adverse effects on protected sites and/or protected species, due to its proximity to statutory designated sites and the presence of BAP habitat on the site, if unmitigated.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding and the site is located entirely within Flood Zone 1.</p> <p>The site is not located in an area to take advantage of sustainable modes of transport, with frequent bus services located in Brixham town centre approx. 1.2km from the site. It is recognised that there are services approx. 300m from the site, though these are less frequent.</p>	
<b>Historic Environment and Landscape</b>	<p>The site is located approx. 100m from the South Devon AONB. Development on the site would relate well to its surroundings, and is not considered to result in adverse effects on the AONB.</p> <p>In terms of historic environment designations, the site is located within the Brixham Town Conservation Area; as well as being located adjacent to Ashhole Cavern Scheduled Monument, which is on the boundary of the site. There are also four Grade II listed buildings in close proximity to the site, including the HM Coastguard Rescue Station (Including Walls, Piers, Railings at Front Approach) to the north, on the opposite side of Berry Head Road; No 14-32 (including front garden walls and railings) Berry Head Road to the north east of the site; Gun Battery (approximately 10 metres west of The Battery) to the north east of the site; and the Gun Battery Immediately North Of Round Top, located to the south of the site.</p> <p>Development may have negative effects on the setting of these designations- however given the current use of the site as a car park, development also has the potential to enhance the setting of the historic environment. This is significant given that the Brixham Town Conservation Area has been deemed to be 'at risk' by Historic England.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, or located within a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>Located at some distance from amenities in Brixham town centre, the site has relatively poor access to key services, facilities and frequent public transport links. However, the site is well placed for key walking routes.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes, as well as Berry Head, coastal amenity and Shoalstone Outdoor Pool. This would bring a range of benefits for the health and wellbeing of residents on the site. The site is not easily accessible to health care facilities, being located 1.6km from a Primary Healthcare Centre.</p>	
<b>Transportation</b>	<p>The site is currently accessible for vehicles by Berry Head Road. Whilst the site is at some distance from key bus services, the site is well connected to walking and cycling routes.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.12: Site 11: St Kilda**

SEA theme	Commentary, Site 11: St Kilda	
<b>Biodiversity and Geodiversity</b>	<p>The site is located approx. 800m from two statutory designated sites, Berry Head to Sharkham Point SSS and South Hams SAC; and 950m from Berry Head NNR.</p> <p>In relation to Berry Head to Sharkham Point SSS, the site is not within an SSSI Impact Risk Zone for residential development in an urban area, therefore it is concluded that allocation at the site is likely to have no effect on the SSSI.</p> <p>The site contains no areas of BAP Priority Habitat.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the majority of the site is located within Flood Zone 1; though the site has a watercourse on its north-western boundary, with Zone 3 around this; however it is not possible to confirm if this is within the boundary. The site's north-western boundary is at risk of surface water flooding, in the area closest to the watercourse. Development on the site would need to ensure this risk is managed.</p> <p>The site is located in an area well placed for sustainable modes of transport, with frequent bus services located less than 100m away from the site that travel to Brixham town centre (700m away) and, less frequently, Paignton.</p>	
<b>Historic Environment and Landscape</b>	<p>In terms of historic environment designations, the site is located within the Higher Brixham Town Conservation Area. Furthermore, No. 15 Drew Street (Kilda House), which comprises the Victorian property on the site fronting the road, is Grade II listed. Negative effects on the historic environment have the potential to take place without appropriate design and layout; in this context retention of 15 Drew Street and development sensitive to the historic environment value of the site's setting will be required.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, and the site is not located within a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site has good access to services and facilities in Brixham town centre and benefits from frequent public transport links into town.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes, as well as being within 500m of St Mary's Park. This will support the health and wellbeing of residents. Health care facilities are located in close proximity to the site at Brixham Hospital and the adjacent medical centre, approximately 150m to the north.</p>	
<b>Transportation</b>	<p>The site is currently accessible for vehicles by Drew Street.</p> <p>It is considered that allocations at the site would not lead to increased car dependency due to the distance from key services, facilities and frequent public transport links.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.13: Site 12: St Mary's Campsite**

SEA theme	Commentary, Site 12: St Mary's Campsite	
<b>Biodiversity and Geodiversity</b>	<p>The site is located approx. 400m from three statutory designated sites, the Berry Head to Sharkham Point SSSI, the South Hams SAC and Berry Head NNR.</p> <p>In relation to the Berry Head to Sharkham Point SSSI, the site is within an SSSI Impact Risk Zone for any residential development of 10 or more houses outside existing settlements/urban areas; or for any development that is outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures. The site is on the edge of the town and contains some landscape features of importance, and could deliver in the region of 60-70 dwellings. As such, allocations at this location have the potential to have negative effects on the SSSI.</p> <p>The site is understood to be in an area used by Greater Horseshoe Bats, due to the presence of mature trees on the sites. The site has also been established to be located on north east – south west flight paths from the SAC for bats.</p> <p>The site contains no areas of Biodiversity Action Plan (BAP) Priority Habitat.</p> <p>It is therefore concluded that allocations at this site have the potential to lead to negative effects on biodiversity.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding. The site is also located entirely within Flood Zone 1. The majority of the site is not at risk of surface water flooding, however a small strip of land is considered at low risk.</p> <p>The site is poorly connect by frequent bus services, though it is recognised that there is a bus stop at the entrance to the site on St Mary's Road, less than 50m from the site edge; however this is not a main service. It is considered that development on this site is likely to lead to a degree of car dependency.</p>	
<b>Historic Environment and Landscape</b>	<p>In terms of historic environment designations, the site is located adjacent to Norton House, a Grade II listed building. Development would need to be sensitive to the historic environment value of the listed building's setting.</p> <p>The site is within the South Devon AONB, and the site's 'green' outlook retains the open character of the AONB. As such development at this location would have negative effects on the setting and integrity of the AONB.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, nor is the site located in a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site has poor access to services and facilities in Brixham town centre.</p> <p>Development of the site would lead to the loss of a campsite which is an important facility for the Neighbourhood Plan area's visitor economy.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes, including the South West Coast Path and is accessible to high quality green infrastructure networks. However other recreational facilities and health care facilities are approx. 1km away. Overall, the effect is considered to be positive in relation to the SEA theme.</p>	
<b>Transportation</b>	<p>The site is accessible from St Mary's road, which is a narrow road unsuited to significant traffic.</p> <p>It is considered that an allocation at the site would result in a degree of car dependency, due the site's distance from key services, facilities and frequent public transport links.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.14: Site 13: St Mary's / Old Dairy**

SEA theme	Commentary, Site 13: St Mary's / Old Dairy	
<b>Biodiversity and Geodiversity</b>	<p>The site is located approx. 700m from three statutory designated sites, Berry Head to Sharkham Point SSSI, South Hams SAC, and Berry Head NNR.</p> <p>In relation to Berry Head to Sharkham Point SSSI, the site is within an SSSI Impact Risk Zone for any development that is outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures. The eastern part of the site a greenfield site and contains some landscape features of importance. Furthermore, the site is understood to be in an area used by Greater Horseshoe Bats, due to the presence of mature trees on this part of the site. The site has been established to be located on north east – south west flight paths from the SAC for bats.</p> <p>The previously developed western part of the site has the potential to be less likely to be of biodiversity significance than the eastern part of the site, although offers potential for the presence of brownfield biodiversity.</p> <p>The site contains no areas of Biodiversity Action Plan (BAP) Priority Habitat.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding and is located entirely within Flood Zone 1. The majority of the site is not at risk of surface water flooding, however a small area of land is considered at low risk, that would need to be managed. However, this is not considered to be a significant constraint to development, nor result in significant negative effects.</p> <p>The site is located in an area with reasonable access to sustainable modes of transport, with local bus routes nearby, though more frequent bus routes are further from the site.</p>	
<b>Historic Environment and Landscape</b>	<p>In terms of historic environment designations, the site is located adjacent to Norton House a Grade II listed building and is located in close proximity to the Grade II listed 1, 2 and 3, St Marys Road. Development would need to be sensitive to the historic environment value of the listed buildings' setting.</p> <p>The site consists of two parts: half the site has been previously developed; the other part is greenfield. The greenfield part is within the South Devon AONB and provides a green context to the designation. This part of the site's green outlook retains the open character of the AONB. This part of the site is screened from the previously developed part the site.</p> <p>It is concluded that negative effects on the historic environment and landscape/townscape character has the potential to take place with development on this site, if not mitigated through appropriate design and layout of the development.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, nor is the site located in a Groundwater Source Protection Zone.</p> <p>Given the previous and current uses on the brownfield part of the site, land contamination could be present.</p>	
<b>Population and Community</b>	<p>The site has reasonable access to local facilities, located approx. 500m from the site; though key services and facilities in Brixham town centre are located further away.</p> <p>The site is located within an existing residential area, and is considered to be an infill site.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes, including the South West Coast Path. In addition, St. Marys Park is also in close proximity, and health care facilities are within a reasonable distance, approx. 700m away.</p>	
<b>Transportation</b>	<p>The site is accessible from St Mary's road.</p> <p>It is considered that allocations at the site would result in some car dependence, due to the distance from key services, facilities and frequent public transport links; though the provision of some local services and bus routes means that the effect is considered neutral overall.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.15: Site 14: Torbay Industrial Estate**

SEA theme	Commentary, Site 14: Torbay Industrial Estate	
<b>Biodiversity and Geodiversity</b>	<p>The site is located approx. 1.1km from two statutory designated sites, the Berry Head to Sharkham Point SSSI and the South Hams SAC; and is also located 1.7km from Berry Head NNR.</p> <p>In relation to Berry Head to Sharkham Point SSSI, the site is not within an SSSI Impact Risk Zone for residential development in an urban area.</p> <p>The site contains a large area of woodland, a Biodiversity Action Plan (BAP) Priority Habitat; in addition, a number of trees on the southern and eastern site boundaries are covered by an Area Tree Preservation. However, given the topography of the site, it is unlikely that this woodland of biodiversity value would be lost to development.</p>	
<b>Climate change</b>	<p>The site is raised from New Road and is not in an area at risk of surface water flooding.</p> <p>The site is accessible from New Road. The site has excellent transport links with the rest of Torbay and Newton Abbot; and it is considered that the site allocation would not result in an increase in car dependency, due to the site's limited distance from key services, facilities and frequent public transport links. This will help limit greenhouse gas emissions from transport.</p>	
<b>Historic Environment and Landscape</b>	<p>In terms of historic environment designations, the site is located 100m from a conservation area; however development is unlikely to affect its setting.</p> <p>There are not considered to be any negative effects on the historic environment townscape character resulting from allocation of this site for housing.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, nor is the site located in a Groundwater Source Protection Zone.</p> <p>Given the previous uses as a paint factory, and current uses land contamination could be present; however details of this are unknown.</p>	
<b>Population and Community</b>	<p>The site has excellent access to services and facilities in Brixham town centre.</p> <p>The site is located within an existing residential area. Development offers possibilities for enhancements to the public realm in this location.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes and key services and facilities. This will support the health and wellbeing of residents.</p>	
<b>Transportation</b>	<p>The site is accessible from New Road. The site has excellent transport links with the rest of Torbay and Newton Abbot; and it is considered that the site allocation would not result in an increase in car dependency, due to the site's limited distance from key services, facilities and frequent public transport links.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.16: Site 15: Wall Park Extensions**

SEA theme	Commentary, Site 15: Wall Park Extensions	
<b>Biodiversity and Geodiversity</b>	<p>Allocations on the site are likely to adversely affect protected sites and/or protected species, due to its proximity to internationally and nationally designated sites. The site is located approx. 100m from three statutory designated sites, including Berry Head to Sharkham Point SSSI, South Hams SAC and Berry Head NNR.</p> <p>In relation to the Berry Head to Sharkham Point SSSI, the site is within an SSSI Impact Risk Zone for all development in excess of 10 dwellings. In this context, the potential delivery of 180 dwellings on this site raises the possibility of adverse effects on the SSSI.</p> <p>The site contains several individual and group TPOs on site, mostly clustered on the eastern edge of the site. The site is also within flight paths and the sustenance zone for Greater Horseshoe Bats.</p> <p>The site contains no BAP Priority Habitat.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding; the site is located entirely within Flood Zone 1. A small proportion of the site to the south west is at risk of surface water flooding; development would need to ensure this risk is managed, however this is not considered to be a significant constraint to development.</p> <p>The site has good access by sustainable modes of transport, with bus services located close by, though more frequent bus services to a wider range of destinations go from Brixham Town Centre, approx. 600m from the site. However, due to the potential scale of development, it is considered that development on this site is likely to result in an increase greenhouse gas emissions from an increase in the built footprint of the area and additional transport emissions.</p>	
<b>Historic Environment and Landscape</b>	<p>The site is located within the South Devon AONB. The site's 'green' outlook retains the open character of the AONB at this location. In this context, in landscape and townscape terms, the current green perspective of the site is a key contributor to the character of the AONB at this edge-of-town location.</p> <p>The site is adjacent to one Grade II listed structure (a boundary stone), and is in close proximity to a scheduled monument, the Old Redoubt and later Victorian Rifle Range Target; both are located to the south east of the site.</p>	
<b>Land, Soil and Water Resources</b>	<p>It is not possible to confirm if the site will lead to a loss of Best and Most Versatile Agricultural Land, as it is not possible to differentiate between Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such), as no recent land classification has been undertaken.</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site has reasonable access to key services, facilities and frequent public transport links in Brixham town centre. However significant allocations at the site would lead to the loss of land of community value.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes. Shoalstone Outdoor Swimming Pool is approx. 700m away and the site is accessible to key green infrastructure assets, including Berry Head and the coast path.</p> <p>The site is also reasonably accessible to health care facilities, being located 600m from a Primary Healthcare Centre.</p>	
<b>Transportation</b>	<p>The site is accessible from Gillard Road and Centry Road, however it is a narrow road unsuited to significant year-round traffic flows.</p> <p>Due to the size of development area, it is considered that the site would result in an increase in traffic flows in the area.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.17: Site 16: Archery Field**

SEA theme	Commentary, Site 16: Archery Field	
<b>Biodiversity and Geodiversity</b>	<p>The site is not located within 1km of a statutory designated site. The nearest designated site is Saltern Cove SSSI, approx. 1.9km to the north east of the site, which is designated for its geology as well as flora.</p> <p>The site is within the SSSI Impact Risk Zone for Berry Head to Sharkham Point SSSI, relating to all planning applications outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures. The site is on the outskirts of Galmpton, being developed on greenfield land. In this context, whilst the distance of the site to the SSSI limits the likelihood of significant effects, the delivery of 110 dwellings on this site raises the possibility of adverse effects on the SSSI without avoidance and mitigation measures.</p> <p>The site contains no BAP Priority Habitat.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site contains a small watercourse to the south west, which comprises flood risk zones for fluvial flooding; however the majority of the site located within Flood Zone 1. A small proportion of the site around the watercourse, as well as the southern site boundary is at risk of surface water flooding. Development would need to ensure this risk is managed or avoided through appropriate layout.</p> <p>The site is located in an area relatively well connected to sustainable modes of transport, with frequent bus services approx. 300m to the north west, near to Churston Golf Club. In addition, there is also a park and ride service to the south west that serves Brixham. However, the location of the site on the A379 has the potential to encourage car use.</p>	
<b>Historic Environment and Landscape</b>	<p>The site is not located within an AONB, nor does the site consist of any sites of historic interest within or adjacent to the site. However, whilst the site is not within the South Devon AONB, development at this location has the potential to affect views from the AONB to the south.</p>	
<b>Land, Soil and Water Resources</b>	<p>It is not possible to confirm if the site will lead to a loss of Best and Most Versatile Agricultural Land, as no recent land classification has been undertaken. Whilst the land was classified as Grade 3 agricultural land, it is not possible to differentiate between Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such).</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site has access to services, facilities and frequent public transport link in Galmpton, with good transport links to the larger settlements in Torbay.</p> <p>From a local perspective, development at this location would extend Galmpton to the south, beyond the railway line which currently comprises the boundary of the settlement. As such, the development may not be cohesive with the rest of Galmpton.</p>	
<b>Health and Wellbeing</b>	<p>Health and wellbeing of residents would be supported by green infrastructure networks present locally, several playing pitches within 100m of the site, and Churston Golf Course is within 200m of the site.</p> <p>The site though is further from health care facilities, being located 1.3km away from a Primary Healthcare Centre.</p>	
<b>Transportation</b>	<p>The site is currently accessible by a track from Brixham Road (A379) that would require upgrading.</p> <p>The site is accessible by public transport networks.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects



**Table 3.18: Site 17: Golf Club**

SEA theme	Commentary, Site 17: Golf Club	
<b>Biodiversity and Geodiversity</b>	<p>The site is within the SSSI Impact Risk Zone for Berry Head to Sharkham Point SSSI, that relates to all planning applications outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures. The site is on the outskirts of Galmpton and within a golf course. Whilst the distance of the site to the SSSI limits the likelihood of significant effects, the delivery of in the region of 135 dwellings on this site raises the possibility of adverse effects on the SSSI without avoidance and mitigation measures.</p> <p>There are TPOs on the tree lines along the eastern boundary and part of the west boundary. The site contains no BAP Priority Habitat.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding; with the site located entirely within Flood Zone 1.</p> <p>The site is located in an area with good links by sustainable transport, with frequent bus services adjacent to the site; in addition, there is also a park and ride service to the south that serves Brixham. However, due to the potential scale of development, it is considered that development on this site is likely to result in increases in GhG emissions to the increase in the built footprint of the area.</p>	
<b>Historic Environment and Landscape</b>	<p>The site is not located within an AONB, nor does the site consist of any sites of historic interest within or adjacent to the site.</p> <p>However, development of the site at the scales proposed would lead to the loss of very visible area of greenspace in the area. In this context the loss of the green perspective of the area would have significant effects on local townscape character.</p>	
<b>Land, Soil and Water Resources</b>	<p>It is not possible to confirm if the site will lead to a loss of Best and Most Versatile Agricultural Land, as it is not possible to differentiate between Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such), as no recent land classification has been undertaken.</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site has good access to public transport links, as well as local services.</p> <p>The development of this site would represent a loss of open space in the area, and the golf course would need to be reconfigured and land found for a new club house. There are however a range of nearby open green spaces that are open to public use.</p>	
<b>Health and Wellbeing</b>	<p>Health and wellbeing of residents would be supported by green infrastructure networks present locally, several playing pitches within 200m of the site, as well as Churston Golf Course, which would be located adjacent to allocations.</p> <p>The site though is further from health care facilities, being located 1.3km away from a Primary Healthcare Centre.</p>	
<b>Transportation</b>	<p>The site has direct access from the A3022 to the south of the site, and Bascombe Road to north of site. The site has good access by public transport networks.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.19: Site 18: Greenaway Road**

SEA theme	Commentary, Site 18: Greenaway Road	
<b>Biodiversity and Geodiversity</b>	The site is within the SSSI Impact Risk Zone for Berry Head to Sharkham Point SSSI, relating to all planning applications outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures. The site is on the outskirts of Galmpton on a greenfield site. Whilst the distance of the site to the SSSI limits the likelihood of significant effects, the delivery of housing on this site raises the possibility of adverse effects on the SSSI without avoidance and mitigation measures.	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding, with the site located entirely within Flood Zone 1.</p> <p>The site is poorly connected by sustainable modes of transport, with frequent bus services 900m from the site. Therefore it is considered that development on this site is likely to encourage car use, promoting an increase in GHG emissions.</p>	
<b>Historic Environment and Landscape</b>	<p>The site is on the boundary of the South Devon AONB. Development at this location would therefore have impacts on views from the AONB. However this would be limited by the relatively small scale of development, the existing presence of the current residential area on Greenway Park and less sensitive nature of this part of the AONB.</p> <p>The site is also located close to the Galmpton Conservation Area; however existing housing adjacent to the site has not been designated as part of the conservation area</p>	
<b>Land, Soil and Water Resources</b>	<p>As no recent land classification has been undertaken, it is not possible to confirm if the site will lead to a loss of Best and Most Versatile Agricultural Land.</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site has access to services and facilities in Galmpton however has relatively poor access to frequent public transport links.</p> <p>The site is located adjacent to an existing residential area and will be seen as a small extension to Galmpton</p>	
<b>Health and Wellbeing</b>	The site is located close to walking and cycle routes and high quality green infrastructure networks that would bring a range of benefits for the health and wellbeing of residents.	
<b>Transportation</b>	The site is accessed by Greenway Park, a residential close which connects to Greenway Road. Whilst the site has access to services and facilities in Galmpton, it has relatively poor access to frequent public transport links.	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.20: Site 19: Knapman's Yard**

SEA theme	Commentary, Site 19: Knapman's Yard	
<b>Biodiversity and Geodiversity</b>	The site is not constrained by biodiversity considerations. The site is not within an SSSI Impact Risk Zone for residential development and the site does not contain and is not adjacent to BAP Priority Habitat.	
<b>Climate change</b>	In relation to adapting to the effects of climate change, the southern end of the site may be vulnerable to flooding (given a potential overlap with Flood Zone 3), but it is likely that development would readily be able to avoid this area at risk given the sloping nature of this the site. The site is not located within identified surface water flooding though there are areas at risk adjacent to the southern boundary.  The site is located within a reasonable distance of sustainable modes of transport, with frequent bus services 750m from the site, and the site is in close proximity to the services and facilities of Galmpton.	
<b>Historic Environment and Landscape</b>	The site is not within the South Devon AONB. The site is within the Galmpton Conservation Area. As such, with inappropriate design and layout, development could have negative effects on the fabric and setting of the conservation. Area. However, given the current use of the site as a builder's yard, development at this location offers significant potential to enhance the quality of the public realm and setting of the historic environment at this location, with benefits for the integrity of the conservation area..	
<b>Land, Soil and Water Resources</b>	The site is not located on agricultural land or within a Groundwater Source Protection Zone.	
<b>Population and Community</b>	The site is at some distance from frequent public transport services; though located close to the services and facilities of Galmpton, including the shop and primary school.  The site is located within an existing residential area, and would relate well to existing residential areas.	
<b>Health and Wellbeing</b>	The site is located close to walking and cycle routes and high quality green infrastructure networks. This will support health and wellbeing.	
<b>Transportation</b>	The site is accessed via a narrow road off of Stoke Gabriel Road, though the small size of the development may reduce the significance of this issue. The site is located within a reasonable distance of public transport networks with frequent bus services 750m from the site. The site is also in close proximity to the services and facilities of Galmpton, which reduces the need to travel.	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.21: Site 20: The Piggery**

SEA theme	Commentary, Site 20: The Piggery	
<b>Biodiversity and Geodiversity</b>	<p>The site is within the SSSI Impact Risk Zone for Berry Head to Sharkham Point SSSI, relating to all planning applications outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures. However effects of development at this location on the SSSI are likely to be minimal, given the size of the site and the distance of the site to the SSSI.</p> <p>The site contains no BAP Priority Habitat; though it is adjacent to an area of traditional orchard.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site has a watercourse running through the site. More than half of the site (south-eastern half of the site) is within a Flood Zone 2 and 3 for fluvial flooding. This part of the site also at risk of surface water flooding. The site is liable to flooding from run off from surrounding fields.</p> <p>The site is close to sustainable modes of transport, with frequent bus services located on the A3022, less than 100m from the site; though there is no footpath to connect the site to the bus stop.</p>	
<b>Historic Environment and Landscape</b>	<p>There are a number of landscape and heritage designations that affect the site, consisting of: the Churston Conservation Area, which the site is within; the South Devon AONB, which is located close to the boundary; and the Grade II listed properties to the immediate east of the site, and across the A3022 from the site.</p> <p>Developing the site, which is presently a garden, may significantly alter the character of this part of the village; as well as the setting of the historic environment and landscape designations present locally.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is located on Grade 2 agricultural land, classified as Best and Most Versatile Agricultural Land. Development on this site would result in a loss of Best and Most Versatile Agricultural Land. This comprises a negative effect in relation to this SEA theme, as this is land which is the most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses. However it is recognised that the site is currently not in use for agriculture.</p> <p>The site is not within a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site is close to frequent public transport services; as well as a shop; though other services and amenities are further afield.</p> <p>The site has not previously been developed, and to do so would extend the line of properties in the immediate area; in addition development may significantly alter the character of this part of the village. It is therefore considered that development would not add to or promote community cohesion in the area or fit well with the existing residential pattern of Churston.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to a busy main road, with poor pedestrian access. As such, an allocation at this location would lead to implications for road safety.</p>	
<b>Transportation</b>	<p>The site does not currently have vehicle access; furthermore, whilst there is nearby access to public transport, the site is not accessible by an existing footpath. The current site access along the A3022 is hazardous for pedestrians. Therefore a new access and footpath would be required to access the site.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.22: Site 21: Waterside Quarry**

SEA theme	Commentary, Site 21: Waterside Quarry	
<b>Biodiversity and Geodiversity</b>	<p>The site is located within 300m of a statutory designated site, Saltern Cove SSSI, which is designated for its geology as well as flora.</p> <p>The site is not within an SSSI Impact Risk Zone for residential development; as such development at the site is unlikely to have adverse effects on the SSSI.</p> <p>The site contains no areas of BAP Priority Habitat. However there are approximately 20 TPOs within the site's boundary. The layout of the development will therefore need to be sensitive to these.</p> <p>Due to the potential for the trees to support protected species, development on the site is considered to have an adverse effect on biodiversity without appropriate mitigation measures. However recent surveys have highlighted that the site is not suitable for Greater Horseshoe Bats.</p> <p>The site is of geodiversity interest. In this context part of the site forms part of a larger Regionally Important Geological Site (RIGS) known as Goodrington Quarry. This designation relates to the quarry wall face and includes the sides of the Dartmouth Road cutting.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding. The site is also located entirely within Flood Zone 1.</p> <p>The site is located in an area to take advantage of sustainable modes of transport, with frequent bus services on Dartmouth Road. This will help limit GhG emissions from transport.</p>	
<b>Historic Environment and Landscape</b>	<p>The site is not located within an AONB, and no sites of historic interest are presented within or adjacent to the site. The site is within an ULPA but, as with adjacent completed and committed development, a development of this site offers the potential for landscape enhancements.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, and is not within a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site is close to frequent public transport services along Dartmouth Road, and as such has good access to the services and facilities of Paignton.</p> <p>The site is located within an existing residential area, and would relate well to surrounding communities.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes, as well as public green space 250m north of the site. This will support health and wellbeing.</p>	
<b>Transportation</b>	<p>The site is accessible from Waterside Road and Dartmouth Road. The site has excellent links with the rest of the Torbay by road, public transport and walking and cycling.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.23: Site 22: White Rock Extensions**

SEA theme	Commentary, Site 22: White Rock Extensions	
<b>Biodiversity and Geodiversity</b>	<p>The site is within the SSSI Impact Risk Zone for all planning applications outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures. The site is on the outskirts of Churston and Galmpton and is located on farmland. Given the potential size of the allocation on this site, the development may have the possibility of adverse effects on the SSSI without avoidance and mitigation measures. However, due to the distance of the site from the Berry Head to Sharkham Point SSSI, effects of new development are likely to be limited on the SSSI.</p> <p>The site contains no BAP Priority Habitat. There are TPOs on several trees on the northern boundary of the site, but it is unclear whether these fall within the site's boundaries.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding. There is however small parts of the site at risk of surface water flooding.</p> <p>The site is located in an area with good transport links, with frequent bus service from the A3022 adjacent to the site. However due to the number of houses the site could accommodate (250 dwellings), the development of the site would lead to an increase in GHG emissions linked to an increase in the size of the built footprint of the area.</p>	
<b>Historic Environment and Landscape</b>	<p>Development of a site of this scale at this location has the potential to have a significant impact on wider views in the area and the character of the area's rural landscape. Whilst the site is outside of the South Devon AONB (500m from the western boundary of the site), views from the AONB are likely to be affected. In this context development of the whole site would likely result in impacts on views from key parts of the AONB, including from the River Dart valley. In terms of potential effects on adjoining areas, there is potential for the site to incorporate a green gap between proposed and new development.</p> <p>In terms of cultural heritage assets, there are no designated features of historic environment interest on or surrounding the site.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is located on Grade 2 and 3a agricultural land, which is land classified as Best and Most Versatile Agricultural Land. This is land which is deemed to be the most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses.</p> <p>The site is not within a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site is close to frequent public transport services, a primary school and primary health care facilities; though other services and amenities are located further away.</p> <p>Development of the site would represent a major encroachment of the built up area into the previously undeveloped area, with less potential to support community cohesion.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes, as well as within reasonable distance of public open space. The site also benefits from easy access to health care facilities that are located 500m away.</p>	
<b>Transportation</b>	<p>The site is accessible from A3022 and has good road and public transport links with the rest of Torbay.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.24: Site 23: Former Jewson**

SEA theme	Commentary, Site 23: Former Jewson		
<b>Biodiversity and Geodiversity</b>	<p>The site does not comprise, and is not adjacent to, BAP priority habitat and is likely to have limited biodiversity interest.</p> <p>The site is located approx. 1.1km from two statutory designated sites, the Berry Head to Sharkham Point SSSI and the South Hams SAC; and is also located 1.7km from Berry Head NNR.</p> <p>In relation to Berry Head to Sharkham Point SSSI, the site is not within an SSSI Impact Risk Zone for residential development in an urban area.</p>		
<b>Climate change</b>	<p>The site is not in an area at risk of surface water flooding.</p> <p>The site is accessible from New Road. The site has excellent transport links with the rest of Torbay and Newton Abbot; and it is considered that the site allocation would not result in an increase in car dependency, due to the site's limited distance from key services, facilities and frequent public transport links. This will help limit greenhouse gas emissions from transport.</p>		
<b>Historic Environment and Landscape</b>	<p>In terms of historic environment designations, the site is located 100m from a conservation area; however development is unlikely to affect its setting.</p> <p>There are not considered to be any negative effects on the historic environment townscape character resulting from allocation of this site for housing.</p>		
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, nor is the site located in a Groundwater Source Protection Zone.</p> <p>The site comprises previously developed and underutilised land. Redevelopment of the site would comprise efficient use of land.</p>		
<b>Population and Community</b>	<p>The site has excellent access to services and facilities in Brixham town centre.</p> <p>The site is located within an existing residential area. Development offers possibilities for enhancements to the public realm in this location.</p>		
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes and key services and facilities. This will support the health and wellbeing of residents.</p>		
<b>Transportation</b>	<p>The site is accessible from New Road. The site has excellent transport links with the rest of Torbay and Newton Abbot; and it is considered that the site allocation would not result in an increase in car dependency, due to the site's limited distance from key services, facilities and frequent public transport links.</p>		
<b>Key</b>			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effects	

**Table 3.25: Site 24: Castor Road**

SEA theme	Commentary, Site 24: Castor Road	
<b>Biodiversity and Geodiversity</b>	<p>The site is located approx. 600m from two statutory designated sites, Berry Head to Sharkham Point SSS and South Hams SAC; and 850m from Berry Head NNR.</p> <p>In relation to Berry Head to Sharkham Point SSSI, the site is not within an SSSI Impact Risk Zone for residential development in an urban area, therefore it is concluded that allocation at the site is likely to have no effect on the SSSI.</p> <p>The site contains no areas of BAP Priority Habitat, although there are some features</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is located within fluvial Flood Zone 1. Parts of the site are however at risk of surface water flooding, and a part of the site comprises a Critical Drainage Area. As such development on the site would need to ensure this risk is managed.</p> <p>The site is located in an area well placed for sustainable modes of transport, with frequent bus services located less than 200m away from the site that travel to Brixham town centre (900m away) and, less frequently, Paignton.</p>	
<b>Historic Environment and Landscape</b>	<p>In terms of historic environment designations, the site is located adjacent to the Higher Brixham Town Conservation Area, which lies to the north. In this context, development sensitive to the historic environment value of the site's setting will be required.</p> <p>The Grade II listed Castor House and Castor Stores is located on Castor Road, approximately 20m from the site and close to the likely entry point to the site. However the setting of this heritage feature is not like to be affected by development on the site as it is largely screened by existing properties.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, and the site is not located within a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site has good access to services and facilities in Brixham town centre and benefits from frequent public transport links into town.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking routes, as well as being within 400m of St Mary's Park. This will support the health and wellbeing of residents. Health care facilities are located in proximity to the site at Brixham Hospital and the adjacent medical centre, approximately 300m to the north.</p>	
<b>Transportation</b>	<p>The site is currently accessible for vehicles by Castor Road.</p> <p>It is considered that allocations at the site would not lead to increased car dependency due to the distance from key services, facilities and frequent public transport links.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects



## Assessment of potential locations for site allocations: Employment

In relation to employment sites, the Torbay Local Plan has identified a pool of 'sources of employment land' in Torbay. Two sites located in Brixham Peninsula area are listed. The first is the Northfields Trading Estate, which is listed as a focus for refurbishment and environmental improvements and '*qualitative improvements to upgrade existing provision*'. The second is Oxen Cove and Freshwater Cove, which is listed as a mixed use harbourside development with a focus on marine employment uses.

Whilst supporting these provisions, the Neighbourhood Plan Forum was keen to consider further sites for potentially allocating through the BPNP. This is line with the Local Plan, which highlights that Torbay Council will, in principle, support proposals that deliver employment space and high value jobs, and indicates that Neighbourhood Plans are able to allocate additional employment sites.

In light of this, four sites have been considered for employment uses through the Neighbourhood Plan development process. These are as follows:

- Oxen Cove and Freshwater
- Torbay Trading Estate
- 74 New Road
- Brixham Town Centre

To support the consideration of the suitability of these sites, the SEA process has undertaken an appraisal of the key environmental constraints present at each of the sites and potential effects that may arise. In this context, as for the potential housing sites, these have been considered in relation to the SEA Framework of objectives and decision making questions developed during SEA scoping and the baseline information.

The tables below present a summary of this appraisal, and provide an indication of each site's sustainability performance in relation to the seven SEA themes.

**Table 3.26: Site E1: Oxen Cove and Freshwater**

SEA theme	Commentary, Site E1: Oxen Cove and Freshwater	
<b>Biodiversity and Geodiversity</b>	<p>The site is located approx. 1km from two statutory designated sites, Berry Head to Sharkham Point SSSI and South Hams SAC; as well as approx. 1.3km from Berry Head NNR.</p> <p>The site is not within an SSSI Impact Risk Zone for residential development within an urban area. As such, allocations at this site are unlikely to have effects on the SSSI.</p> <p>The site contains no areas of BAP Priority Habitat; although the site is adjacent to Maritime cliff and slope, as well as intertidal BAP habitats (sand and gravel, and rock platform). However development at this location is unlikely to affect the integrity of these sites.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the majority of the site is located within a Flood Zone 2 and 3, located to the south of the site; while the north of the site is in Flood Zone 1. The majority of the site is not at risk from surface water flood risk, though a very small area is classified as at low risk.</p> <p>The site is located within a reasonable walking distance of Brixham town centre (approx. 700m); with local bus services within 500m.</p>	
<b>Historic Environment and Landscape</b>	<p>In terms of historic environment designations, the site is located within the Brixham Town Conservation Area. Development could therefore have negative effects on the setting of the conservation area, if not designed sensitively. In contrast, this may not necessarily be viewed as an adverse effect, as development at this location may offer significant potential to enhance the quality of the public realm and setting of the historic environment. This is particularly relevant given the conservation area has been deemed to be 'at risk' and the current use of the site as a car park.</p> <p>The site is not located within the South Devon AONB.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, nor is the site located in a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site is located approx. 700m from the centre of Brixham with good links to the town centre.</p> <p>The site is a prominent spot to the north of town, overlooking Torbay, it is currently a car park, and development would support the regeneration of the site; and result in positive effects for the population and community. However, the car park is important for residents, businesses and visitors, and the loss of car parking at this location would have significant effects on existing town centre provision. However, given that new car parking provision would be facilitated through the redevelopment of the site through employment uses, the loss of car parking provision is unlikely to be a significant factor.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes, being adjacent to the South West Coast Path. This will support the health and wellbeing of residents on the site.</p> <p>The site is close to the Brixham trawler fishing fleet, and potentially suffers from some noise issues. However this would not be a significant issue given the proposed provision of marine employment uses at the site.</p>	
<b>Transportation</b>	<p>The site is currently accessible from Blackball Lane, and is located with good access by foot to Brixham Harbour and town centre.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.27: Site E2: 74 New Road**

SEA theme	Commentary, 74 New Road	
<b>Biodiversity and Geodiversity</b>	<p>The site is located approx. 1.1km from two statutory designated sites, the Berry Head to Sharkham Point SSSI and the South Hams SAC; and is also located 1.7km from Berry Head NNR.</p> <p>In relation to Berry Head to Sharkham Point SSSI, the site is not within an SSSI Impact Risk Zone for residential development in an urban area.</p> <p>The site contains no BAP Priority Habitat. However, there is Broadleaved Deciduous Woodland identified in the National Forest Inventory which covers a small area at the south of the site. There are no TPOs on any trees within the site's boundaries. Due to the potential for the trees to support protected species, loss of the wooded areas of the site is considered to have the potential for adverse effect on biodiversity.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, a small portion of the northern section of the site adjacent to New Road is located within Flood Zone 3. However, it is likely that development would readily be able to avoid this area at risk.</p> <p>The site is located in an area with good transport links, with frequent bus service from the A3022 adjacent to the site. Although there is potential for an employment development to increase the number of cars on the road (and therefore increase in GHG emissions) it is considered that the accessibility to public transport options should mitigate against this effect to some degree.</p>	
<b>Historic Environment and Landscape</b>	<p>The site is not located within an AONB. However, In terms of cultural heritage assets, there is a grade II listed Lime Kiln located in the central part of the site. Developing the site may require the removal of this designated structure or result in significantly altering its setting and character.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, and is not within a Groundwater Source Protection Zone.</p>	
<b>Population and Community</b>	<p>The site is close to frequent public transport services and development of an employment site would contribute to maintaining the vitality of Brixham while ensuring local access to goods, services and / or employment opportunities.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes, as well as within close proximity of public open space (Parkham Field recreational ground is located south of the site).</p>	
<b>Transportation</b>	<p>The site is accessible from A3022 and has good road and public transport links with the rest of Torbay.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.28: Site E3: Torbay Trading Estate**

SEA theme	Commentary, E3 Torbay Trading Estate	
<b>Biodiversity and Geodiversity</b>	<p>The site is located approx. 1.1km from two statutory designated sites, the Berry Head to Sharkham Point SSSI and the South Hams SAC; and is also located 1.7km from Berry Head NNR.</p> <p>In relation to Berry Head to Sharkham Point SSSI, the site is not within an SSSI Impact Risk Zone for residential development in an urban area.</p> <p>The site contains a large area of woodland, a Biodiversity Action Plan (BAP) Priority Habitat; in addition, a number of trees on the southern and eastern site boundaries are covered by an Area Tree Preservation. However, given the topography of the site, it is unlikely that this woodland of biodiversity value would be lost to development.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding. The site is also located entirely within Flood Zone 1.</p> <p>The site is located in an area with good transport links, with frequent bus service from the A3022 adjacent to the site. Although there is potential for an employment development to increase the number of cars on the road (and therefore increase in GHG emissions) it is considered that the accessibility to public transport options should mitigate against this effect to some degree.</p>	
<b>Historic Environment and Landscape</b>	<p>In terms of historic environment designations, the site is located 100m from a conservation area; however development is unlikely to affect its setting.</p> <p>There are not considered to be any negative effects on the historic environment townscape character resulting from allocation of this site for housing.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, nor is the site located in a Groundwater Source Protection Zone.</p> <p>Given the previous uses as a paint factory, and current uses land contamination could be present; however details of this are unknown.</p>	
<b>Population and Community</b>	<p>The site is close to frequent public transport services and development of an employment site would contribute to maintaining the vitality of Brixham while ensuring local access to goods, services and / or employment opportunities.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes, as well as within close proximity of public open space (Parkham field is located approximately 130m to the south west of the site). This should help to support the health and wellbeing of employees.</p>	
<b>Transportation</b>	<p>The site is accessible from A3022 and has good road and public transport links with the rest of Torbay and Newton Abbot.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 3.29: Site 3: Brixham Town Centre Car Park and Town Square**

SEA theme	Commentary, Site 3: Brixham Town Centre Car Park and Town Square	
<b>Biodiversity and Geodiversity</b>	<p>The site is located approx. 1km from two statutory designated sites, including Berry Head to Sharkham Point SSSI and South Hams SAC; as well as 1.2km from Berry Head NNR. The site is not within an SSSI Impact Risk Zone for residential development within an urban area. As such it is unlikely that the site will have negative effects on the SSSI.</p> <p>The site contains no areas of BAP Priority Habitat. Development on the site is considered to have limited effects on biodiversity.</p>	
<b>Climate change</b>	<p>In relation to adapting to the effects of climate change, a large proportion of the site sits within Flood Zone 3 ('high probability' flood zone, where there is 1 in 100 or greater annual probability of flooding) associated with the Lupton watercourse and Higher Brixham watercourse. A large proportion of the site also at high risk from surface water flooding. A sequential test for the site is currently being carried out.</p> <p>The site is located in the centre of Brixham, highly accessible to all services and facilities in Brixham town centre, and adjacent to Town Square bus stop that has frequent buses to surrounding towns. Therefore development at this location will support lower carbon modes of travel.</p>	
<b>Historic Environment and Landscape</b>	<p>In terms of historic environment designations, the site is located within the Brixham Town Conservation Area, and is adjacent to one Grade II listed building (1, Paradise Place) to the eastern corner of the site. Development would need to be sensitive to these; however, this is not necessarily viewed as an adverse effect, as development at this location offers significant opportunities for enhancements to the public realm and setting of the historic environment when compared to its current use as a car park. This is particularly relevant given the conservation area has been deemed to be 'at risk' by Historic England.</p> <p>Due to its distance from the site, development would not have an effect on South Devon AONB.</p>	
<b>Land, Soil and Water Resources</b>	<p>The site is not located on agricultural land, nor is the site located within a Groundwater Source Protection Zone. Development of the site has the potential to reduce land contamination at this location.</p>	
<b>Population and Community</b>	<p>The site is located in the centre of the town, highly accessible to all services and facilities in Brixham town centre, and adjacent to Town Square bus stop that has frequent buses to surrounding towns.</p> <p>As a prominent and accessible town centre location, mixed use development at this site would offer significant possibilities for the town centre; this would support the wider regeneration of Brixham and result in positive effects for the population and community, as well as for tourism to the town.</p>	
<b>Health and Wellbeing</b>	<p>The site is located close to walking and cycle routes that would bring a range of benefits for the health and wellbeing of residents.</p> <p>The site is accessible to health care facilities, being located 250m from a Primary Healthcare Centre.</p>	
<b>Transportation</b>	<p>The site is currently accessible for vehicles; current access is through Bank Lane, which joins Market Street. It is considered that the site would support non-car use, given its highly accessible location from key services, facilities and frequent public transport links.</p> <p>Development on the site though would however result in the loss of car parking in the town centre, and subsequent reduction in traffic within the vicinity. It is hence appropriate that development on this site is accompanied by higher density car parking (e.g. multi-storey) to offset the reduction in the footprint of land area used for car parking as proposed in the Town Centre Master Plan.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

### 3.3.3 Consideration of alternative spatial strategies for the Neighbourhood Plan

#### Development on previously developed land vs greenfield development

At the outset of the BPNP's development process a key intention of the Neighbourhood Plan has been to shape new development within the Neighbourhood Plan area. In this context two potential options were considered, namely whether to 1) focus development on existing previously developed 'brownfield' sites in Brixham, Churston, Galmpton or Broadsands or 2) widen the scope of the Neighbourhood Plan to consider development on previously undeveloped 'greenfield' sites in the Neighbourhood Plan area.

To support decision making on this element of the BPNP, two options were considered as reasonable alternatives through the SEA process.

The two options were as follows:

- Option 1: Facilitate the development of greenfield sites in the Neighbourhood Plan area; and
- Option 2: Focus development on previously developed sites in the Neighbourhood Plan area.

Table 3.28 presents the findings of the appraisal of Option 1 and Option 2 outlined above. To support the assessment findings, the options have been ranked in terms of their sustainability performance against the relevant theme. It is anticipated that this will provide the reader with a likely indication of the comparative sustainability performance of the two options in relation to each theme considered.

**Table 3.30: Appraisal findings: options for broad locations of development**

Option 1: Facilitate the development of greenfield sites

Option 2: Focus development on previously developed sites

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Biodiversity and geodiversity	<p>Potential effects on biodiversity have the potential to take place on both previously developed and greenfield land. Whilst greenfield development has the potential to lead to the loss of key landscape features of biodiversity value and impact on ecological corridors, previously developed land can support a rich biological diversity. In this context previously developed land can provide habitat for UKBAP Priority Species and contribute to wider ecological networks, as well as the provision of ecosystem services such as pollination.</p> <p>All allocations have the potential to have impacts on biodiversity assets if located inappropriately and have poor design and layout. Likewise all allocations have the potential to promote net gains in biodiversity value. In this context, for all sites, potential effects on biodiversity depend on elements such as the provision of green infrastructure to accompany new development areas and the retention and incorporation of biodiversity features.</p>	2	2
Climate change	<p>In terms of greenhouse gas emissions, road transport is a significant contributor to emissions in the area. The extent to which the two options have the potential to support climate change mitigation through facilitating a reduced level of car dependency is therefore a key element. In this context, Option 2, through promoting the development of previously developed land has increased potential to promote development in town and village centre locations which are more integrated with the existing built up area of the Neighbourhood Plan area. This has the potential to allow at some locations easier access to services and facilities by sustainable modes of transport such as walking and cycling.</p> <p>In terms of climate change adaptation, the redevelopment of previously developed land provides opportunities for enhancing the resilience of the brownfield sites and surrounding area to the effects of climate change. This includes through green infrastructure enhancements and design and layout which helps regulate the effects of extreme weather events in the town, including through regulating surface water run-off. In this context, whilst the direct provision of green infrastructure improvements to accompany new development areas should be achievable through both options, including through mechanisms such as the community infrastructure levy, the redevelopment of brownfield land increases scope for direct improvements to climate change resilience.</p>	2	1

**Option 1: Facilitate the development of greenfield sites**

**Option 2: Focus development on previously developed sites**

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Historic environment and landscape	<p>Option 1, through facilitating greenfield development in the BPNP area, increases the scope for impacts on landscape character, including from visual impact and impacts on noise quality. The potential significance of such effects is increased due to the location of many potential greenfield sites within, or visible from the South Devon AONB. As such greenfield development has increased potential to have impacts on the special qualities of the AONB.</p> <p>Whilst Option 2 has the potential to have direct impacts on historic environment assets located on brownfield sites, high quality development sensitive to the historic environment resource has the potential to support enhancements to townscape character and the rejuvenation of disused or underutilise historic environment assets. Given the significant opportunities for supporting the reuse and rejuvenation of existing heritage assets in Brixham town, this will support the town's historic environment resource, if high quality design and layout is incorporated within new provision. Similarly Option 2 provides opportunities for enhancing local character and distinctiveness if high quality design is incorporated within new provision. Option 2 therefore increases opportunities to rejuvenate existing underutilised heritage assets whilst protecting landscape character, and offering opportunities to enhance visual amenity and the setting of the historic environment.</p>	2	1
Land, soil and water resources	<p>Option 1 will lead to the loss of greenfield land in the Neighbourhood Plan area. The option also has increased potential to lead to the loss of areas of the best and most versatile agricultural land (incorporating, potentially, the Grade 2 and 3a land present in the Neighbourhood Plan area).</p> <p>Option 2 has increased potential to support the efficient use of land through the reuse of existing structures and rejuvenating previously developed land.</p> <p>In terms of water quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place. For example sustainable drainage systems – SuDS – are an effective means of minimising surface water runoff and hence pollution. However, given the potential for development on previously developed land to reduce land contamination, Option 2 has the potential to lead to medium and long term improvements to water quality.</p>	2	1
Population and community	<p>In terms of affordable housing, such provision may be easier to deliver through the larger allocations which there may be more scope to be delivered through Option 1. Whilst all new developments involving one or more dwellings are liable for the community infrastructure levy, concentrating the delivery of housing at larger sites may help to secure additional contributions for site specific mitigation through Section 106 planning agreements (it should be noted however that such contributions are typically required to make a development proposal acceptable in planning terms that would not otherwise be acceptable). Recent legislation has introduced a 10 unit threshold for affordable housing contributions. As such Option 1 may have increased opportunity to deliver affordable housing in the parish.</p> <p>In terms of the provision of services and facilities, the delivery of CIL monies and similar mechanisms are more likely to be achieved through the allocations facilitated through Option 1.</p>	1	2



**Option 1: Facilitate the development of greenfield sites**

**Option 2: Focus development on previously developed sites**

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Health and Wellbeing	<p>The delivery of housing provision through larger scale allocations potentially enabled by Option 1 has the potential to concentrate effects on road safety and noise quality from increased traffic flows at certain locations. This may have effects on the health and wellbeing of residents. Effects however depend on the location of new development areas and the integration of elements such as sustainable transport linkages and green infrastructure provision.</p> <p>Option 2 has the potential for supporting health and wellbeing through improvements to the quality of the built environment in parts of Brixham, Churston, Galmpton and Broadsands. This includes enhancing the quality of the public realm and improving the satisfaction of residents of their neighbourhoods as a place to live. It also increases opportunities for delivering development in town and village centre locations more easily accessible to services, facilities and amenities.</p>	2	1
Transportation	<p>Option 2, through promoting development on previously developed land, has increased potential to facilitate the development of new housing at locations which are more integrated within Brixham, or the villages of Churston, Galmpton and Broadsands. This has the potential to allow, at some locations, easier access to town and village centre services and facilities by sustainable modes of transport such as walking and cycling.</p> <p>However, the provision of new and improved sustainable transport infrastructure to accompany new housing development, including pedestrian/cycle and public transport links may be more feasible with the larger scale of development enabled by Option 1.</p>	2	1

**Alternative options relating to size of allocations**

Policy SDB1 of the Torbay Local Plan highlights that the Brixham Peninsula is expected to provide sufficient land to enable delivery of 660 new homes over the 18-year period from 2012 to 2030. The Local Plan further determined that 234 windfall sites could be relied on to come forward during this period. As of late December 2016 there were 316 commitments (planning permission in place which are considered “deliverable” in line with the definition at note 11 to paragraph 47 of the NPPF).

As such, the Neighbourhood Plan is required to allocate sites for at least 123 new homes.

To provide input into this element, two options have been assessed to consider what size and form new housing sites should take. As such, the SEA process has assessed two broad options linked to the size of housing allocations to be taken forward through the Neighbourhood Plan to deliver the housing numbers set out for Neighbourhood Plan area by the Local Plan. The two options are as follows:

- **Option 1:** Delivery of the remaining Torbay Local Plan housing allocation for the Brixham Peninsula through a limited number of larger sites (of over c.50 dwellings); and
- **Option 2:** Delivery of the Torbay Local Plan housing allocation for the Brixham Peninsula through a larger number of smaller sites (of under c.50 dwellings), which are likely to be dispersed across the Neighbourhood Plan area.

The SEA team appraised these two broad options as ‘reasonable alternatives’ against both the baseline and relatively (i.e. against each other). These were considered through the SEA Framework of objectives and appraisal questions developed during scoping and the two options have been ranked in terms of their sustainability performance against the relevant SEA Theme. The findings of the appraisal are presented in Table 3.31 below.

**Table 3.31: Appraisal findings: options linked to the size of housing allocations**

**Option 1: Delivery of the remaining Torbay Local Plan housing allocation for the Brixham Peninsula through a limited number of larger sites (of over c.50 dwellings);**

**Option 2: Delivery of the Torbay Local Plan housing allocation for the Brixham Peninsula through a larger number of smaller sites (of under c.50 dwellings)**

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Biodiversity and geodiversity	<p>Option 1, the delivery of housing allocations on fewer, but larger sites has the potential to lead to an increased magnitude of localised effects on individual biodiversity assets. This includes habitat loss and direct and indirect impacts on species. Option 2 may however lead to an increase in incremental effects on biodiversity through smaller scale but multiple impacts on assets.</p> <p>All sites have the potential to have significant impacts on biodiversity assets if located inappropriately and have poor design and layout. Likewise all sites have the potential to promote net gains in biodiversity value. In this context, for all sites, potential effects on biodiversity depend on aspects such as the provision of green infrastructure to accompany new development areas and the retention and incorporation of biodiversity features.</p>	2	2
Climate change	<p>In terms of greenhouse gas emissions, road transport is an increasingly significant contributor to emissions in the plan area. The extent to which the two options have the potential to support climate change mitigation through facilitating a reduced level of car dependency is therefore a key element. In this context, Option 2, through promoting housing provision in smaller sites across the plan area, has an increased potential to facilitate the development of new housing at locations which are more integrated with the existing built up areas of Brixham town, Churston, Galmpton and Broadsands. This has the potential to allow at some locations easier access to services and facilities by sustainable modes of transport such as walking and cycling. However Option 1, through promoting larger scale sites, may enable more effective improvements to walking and cycling and public transport links through the infrastructure opportunities afforded by larger allocations.</p> <p>In terms of climate change adaptation, enhancements to the plan area's green infrastructure networks will be a key means of helping the plan area adapt to the effects of climate change. This includes by helping to regulate extreme temperatures and regulate surface run off. Whilst the direct provision of green infrastructure improvements to accompany new development areas may be more tangible through the larger developments proposed through Option 1, mechanisms including the community infrastructure levy provide opportunities for plan area-wide green infrastructure improvements through both options.</p>	2	1

**Option 1: Delivery of the remaining Torbay Local Plan housing allocation for the Brixham Peninsula through a limited number of larger sites (of over c.50 dwellings);**

**Option 2: Delivery of the Torbay Local Plan housing allocation for the Brixham Peninsula through a larger number of smaller sites (of under c.50 dwellings)**

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Historic environment and landscape	<p>By concentrating new housing provision on fewer and larger sites, Option 1 has increased potential to lead to significant impacts on landscape quality in the vicinity of the built up part of the area. This includes the loss of landscape features, visual impacts and impacts on noise quality linked to increased traffic flows. In particular views from the AONB may be adversely affected by larger sites, which are more likely to be greenfield sites on the edge of the built up part of the Neighbourhood Plan area.</p> <p>Meeting housing provision through an increased number of smaller sites is less likely to have significant impacts on landscape quality in the plan area. This is due to increased opportunities through this option for assimilating new development within the existing fabric of the built-up area of Brixham, Churston, Galmpton and Broadsands and increased opportunities for the reuse of previously developed land. The option also increases opportunities for managing the cumulative landscape impacts of the housing provision for the plan area stipulated by the Local Plan.</p> <p>In terms of potential effects on the historic environment, Option 1, through the promotion of larger scale housing developments in the Brixham Peninsula, has the potential to have significant effects on the existing historic setting of the settlements in the plan area. By promoting more compact housing development sites, Option 2 is more likely to facilitate housing provision which more effectively sits within the historic setting of each of the settlements.</p> <p>Option 2, by promoting smaller scale development, increases opportunities for supporting the reuse and rejuvenation of existing heritage assets in Brixham, Churston, Galmpton and Broadsands, including those deemed to be vulnerable or at risk. This will support the Neighbourhood Plan area's historic environment resource, if high quality design and layout is incorporated within new provision.</p>	2	1

**Option 1: Delivery of the remaining Torbay Local Plan housing allocation for the Brixham Peninsula through a limited number of larger sites (of over c.50 dwellings);**

**Option 2: Delivery of the Torbay Local Plan housing allocation for the Brixham Peninsula through a larger number of smaller sites (of under c.50 dwellings)**

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Land, soil and water resources	<p>Option 2, through promoting the development of smaller sites in and around the existing built up areas of the Neighbourhood Plan area, is likely to facilitate an increased level of housing provision taking place on previously developed land. This is linked to an increased deliverability of such sites associated with i) the typically small size of brownfield sites and ii) the associated scope for the development of vacant/underutilised land through this option. This has the potential to limit development on greenfield land in the Neighbourhood Plan area and reduce pressures on the areas of the best and most versatile agricultural land (including Grade 2 and 3 land) which are present in the vicinity of the settlements in the Neighbourhood Plan area. In terms of water quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place. For example sustainable drainage systems – SuDS – are an effective means of minimising surface water runoff and hence pollution. However it should be noted that there is likely to be more scope for the implementation of measures such as SuDS within the larger developments promoted by Option 1.</p>	2	1
Population and community	<p>Both options have the potential to deliver the housing numbers set out for the plan area proposed by the Torbay Local Plan.</p> <p>Option 2 has increased potential to support the provision of housing in locations that allow easy access to a range of local services and facilities (including closer to the centres of Brixham town, Churston, Galmpton and Broadsands). In this context, the delivery of housing through larger sites in Option 1 may be likely to take place at locations less accessible to a wider range services and facilities. Option 2 therefore has greater potential to support inclusive communities.</p> <p>In terms of affordable housing, such provision may be easier to deliver through Option 1. This is linked to the delivery of Section 106 agreements likely to be levied on the larger development areas promoted through this option.</p> <p>Whilst all new developments involving one or more dwellings are liable for the community infrastructure levy, concentrating the delivery of housing at fewer and larger sites may help to enable the securing of additional contributions for site specific mitigation through Section 106 planning agreements. It should be noted however that such contributions are typically required to make a development proposal acceptable in planning terms that would not otherwise be acceptable.</p> <p>In terms of education and skills, the effect of both options depends on the extent to which new housing provision is accompanied by new, expanded and improved education provision in the plan area.</p>	1	2

**Option 1: Delivery of the remaining Torbay Local Plan housing allocation for the Brixham Peninsula through a limited number of larger sites (of over c.50 dwellings);**

**Option 2: Delivery of the Torbay Local Plan housing allocation for the Brixham Peninsula through a larger number of smaller sites (of under c.50 dwellings)**

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Health and Wellbeing	<p>The impacts on air quality from the two options depend both on the location of new development and their impact on traffic flows in key areas of sensitivity, such as the Air Quality Management Area on New Road. Whilst the delivery of housing provision through a smaller number of larger sites has the potential to concentrate effects on air and noise quality from increased traffic flows at certain locations, cumulative impacts have the potential to arise from multiple developments in the Neighbourhood Plan area. As such it is uncertain which of the options are likely to lead to increased impacts on air and noise quality.</p> <p>Option 2 is more likely to lead to housing provision which is located in closer proximity to the centres of Brixham, Churston, Galmpton and Broadsands. This is likely to support the development of housing at locations which are more easily accessible to existing services, facilities and amenities, including health and leisure facilities. This will also support healthier modes of travel, including walking and cycling.</p>	2	1
Transportation	<p>Option 2, through promoting new housing provision in smaller sites across the plan area, has an increased potential to facilitate the provision of housing in locations that allow easy access to a broader range of local services and facilities. This includes promoting the delivery of new housing sites closer to the centres of Brixham, Churston, Galmpton and Broadsands.</p> <p>The provision of new and improved sustainable transport infrastructure to accompany new housing development, including pedestrian/cycle and public transport links may be more feasible with the concentrated nature of development proposed through Option 1.</p>	2	1

### 3.4 Current approach in the Neighbourhood Plan

In light of consultation undertaken to date on the Neighbourhood Plan, and consideration of the assessment findings above, the BPNP Steering Group took the decision to focus development on brownfield sites in Brixham town and the villages rather than allocating land for housing and employment on greenfield sites. In relation to housing allocations, the decision was also taken to allocate housing for the remaining Torbay Local Plan requirement on smaller sites spread amongst the settlements of the Brixham Peninsula.

This was with the aim of:

- Supporting the regeneration of key parts of the Neighbourhood Plan area;
- Facilitating enhancements to the existing public realm, townscape and villagescape of the Neighbourhood Plan area;
- Protecting sensitive landscape character in the vicinity of Brixham town, Churston, Galmpton and Broadsands; and

- Rejuvenating existing areas of derelict and underutilised land in the Neighbourhood Plan area.

In response to this preferred spatial strategy, nine sites have been allocated for housing in the Neighbourhood Plan area, as follows:

Brixham town:

- Town Centre Car Park (25 dwellings);
- St Mary's/Old Dairy (25 dwellings);
- St Kilda (12 dwellings);
- Northcliff Hotel (15 dwellings);
- Torbay Industrial Estate (15 dwellings);
- Oxen Cove and Freshwater (10 dwellings);
- Brixham Police Station (7 dwellings);
- Former Jewson (20 dwellings); and
- Castor Road (10)

Churston, Galmpton and Broadsands:

- Waterside Quarry(10 dwellings); and
- Knapman's Yard (6 dwellings).

In relation to the allocation of employment sites through the BPNP, the Neighbourhood Plan Forum took the decision to allocate all of the available sites considered for employment uses. This is given local support for economic growth and a desire to encourage a broad range of employment uses in the Neighbourhood Plan area.

### 3.5 Development of Neighbourhood Plan policies

The Regulation 14 consultation version of the BPNP (January 2017) put forward 42 policies to guide development in the Neighbourhood Area. These were developed following extensive community consultation and evidence gathering.

To provide context on their sustainability performance, the SA Report accompanying the Regulation 14 consultation version of the BPNP (January 2017) presented an appraisal of these policies.

The key recommendation arising from this appraisal was as follows:

- The Brixham Peninsula Neighbourhood Plan area has a distinctive and internationally designated geodiversity resource. As such, there is potential for further provisions to be included in the BPNP relating to geodiversity. Potential inclusions within the Neighbourhood Plan could incorporate the following:
  - Provisions for the protection and enhancement of features and exposures of interest for geodiversity
  - Support for the aims of the English Riviera Geopark Management Plan
  - Provisions for increasing access to features and areas of geodiversity interest so more people can experience and understand the Neighbourhood Plan's rich and varied geodiversity
  - Utilisation of the Brixham Peninsula's geodiversity resource to support sustainable tourism

Following Regulation 14 consultation on the BPNP, the Neighbourhood Plan was updated to take into account responses received during the six week period of consultation. The BPNP was also updated to reflect the recommendation included in the SA Report accompanying the Regulation 14 consultation version of the BPNP.

## 4. What are the appraisal findings at this current stage?

### 4.1 Introduction

The aim of this chapter is to present appraisal findings and recommendations in relation to the Submission version of the BPNP. This chapter is structured as follows:

**Sections 4.3 to 4.6** present an appraisal of the Submission version of the BPNP under the seven SEA theme headings; and

**Section 4.10** subsequently discusses overall conclusions at this current stage and recommendations for the next stage of plan-making.

### 4.2 Approach to the appraisal

The appraisal is structured under the seven sustainability themes.

For each theme 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations.<sup>9</sup> So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered. These effect 'characteristics' are described within the assessment as appropriate.

Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

### 4.3 Biodiversity and geodiversity

Given the significant number of biodiversity constraints present in the Neighbourhood Plan area, allocations at a number of the sites have the potential to lead to negative effects on biodiversity without appropriate mitigation and avoidance measures. These include following:

- The St Mary's / Old Dairy site is within the Impact Risk Zone for the Berry Head to Sharkham Point SSSI, and is adjacent to some landscape features likely to be of biodiversity importance. Furthermore, the site is understood to be in an area used by Greater Horseshoe Bats, due to the presence of mature trees on the sites and the site has been established to be located on north east – south west flight paths from the SAC for bats. It should be noted though that the key features of biodiversity interest are however on the undeveloped part of the site, which is not proposed for development. This will help limit potential effects on biodiversity.
- The Torbay Industrial Estate site contains areas of woodland, which has been designated as a Biodiversity Action Plan (BAP) Priority Habitat, with a number of trees on the southern and eastern site boundaries covered by an Area Tree Preservation Order. However, given the location of the trees on the boundaries of the site, and the topography of the site, it is unlikely that this woodland of biodiversity value would be lost to development.

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<sup>9</sup> Environmental Assessment of Plans and Programmes Regulations 2004

- The 74 New Road Employment allocation is located adjacent to an area of Deciduous Woodland Biodiversity Action Plan Habitat. There will be however be no loss of this habitat as a result of employment development on the site.
- In relation to the Brixham Police Station site, the site is within an Impact Risk Zone for the Berry Head to Sharkham Point SSSI relating to development which comprises 10 residential dwellings or more. However only seven dwellings are allocated on this site through the Neighbourhood Plan; as such this reduces the likelihood of adverse effects on the SSSI.
- The Waterside Quarry site has some potential biodiversity interest, relating to the quarry walls and the mature trees present on the site.

The allocations at Oxen Cove and Freshwater, St Kilda, Northcliff Hotel, Town Centre Car Park, and the Knapman's Yard sites are considered likely to have limited effects on biodiversity. In this context no significant biodiversity habitats (including BAP Priority Habitats) are present on the sites, and the sites are not within SSSI Impact Risk Zones for the type of the development likely to be progressed at these locations.

In relation to potential effects on designated sites of marine importance in the area, there will be no adverse impacts as a result of the BPNP on the Lyme Bay and Torbay marine candidate Special Area of Conservation (cSAC), the Torbay Marine Conservation Zone (MCZ), or, in relation to site allocations in Galmpton, the Dart Estuary MCZ.

Whilst significant effects on biodiversity assets from Neighbourhood Plan site allocations are unlikely, there will be a need for potential effects on biodiversity linked to the allocations to be avoided and mitigated. In this context the current version of the BPNP sets out a range of provisions which will 1) help limit potential effects from new development on features and areas of biodiversity interest in the Neighbourhood Plan area and 2) support enhancements.

In this regard, Policy E8 (Nationally important ecological sites) sets out provisions for ensuring that new development on the Brixham Peninsula does not undermine the integrity of the nationally designated Berry Head to Sharkham and Saltern Cove SSSI, which comprises the part of the South Hams SAC located within the Neighbourhood Plan area<sup>10</sup>. The policy also seeks to protect the biodiversity value of the Berry Head National Nature Reserve. At a local level, Policy E7 (Local wildlife sites) seeks to protect locally designated wildlife sites in the Neighbourhood Plan area, including County Wildlife Sites.

In terms of habitats and species Policy E8 also seeks to ensure that all species covered by the Wildlife and Conservation Act (1981) and the Conservation of Habitats and Species Regulations (2010), including Wildlife Countryside Marine Management – The Conservation of Habitats and Species (Amendment) Regulations 2012, are offered protection through the Neighbourhood Plan. Two key species are offered particular protection; the policy seeks to protect the habitat, roosts, strategic flyways and sustenance zones of the Greater Horseshoe Bat, and seeks to protect the habitat and nesting sites of the Cirl Bunting.

Ecological networks in the Neighbourhood Plan area will also be supported by the policies which promote open space and green infrastructure enhancements. In this context Policy E2 (Settlement boundaries) seeks to ensure that new development in the countryside protects biodiversity assets, Policy E3 (Green wedges) promotes the application of appropriate boundary treatments, native tree planting and the protection of hedgerows, and Policy EC4 (Local Green Spaces) enables the designation of Local Green Spaces for special wildlife importance. Biodiversity is also provided with an overarching degree of protection by Policy E1 (Landscape beauty and protected areas), which seeks to ensure that biodiversity is '*preserved and enhanced*'. In this context the policies offer a proactive approach to protecting and enhancing habitats and species and ecological networks in the Neighbourhood Plan area.

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<sup>10</sup> A Habitats Regulations Assessment is being currently being undertaken to evaluate potential effects of the BPNP on the South Hams SAC and the Lyme Bay and Torbay SAC, which is being reported on separately.



In terms of the Neighbourhood Plan area's rich geodiversity resource, only policy E1 alludes to geodiversity though the seeking to support the landscape elements provided by the Geopark designation. Indirectly, the design policies also support the use of local building materials. Whilst these policies provide some indirect benefits in relation to geodiversity, there is further potential for the policies of the Neighbourhood Plan to support the Neighbourhood Plan area's rich geological resource.

## 4.4 Climate change

In terms of climate change mitigation, road transport is an increasingly significant contributor to greenhouse gas emissions in the Neighbourhood Plan area.

In this context Policy T1 seeks to ensure that new development proposals maximise the potential for pedestrian and cycle linkages, as well as supporting measures to provide greater separation between motor vehicles and travellers. In addition, Policies T1 to T3 aim to improve sustainable travel options through the development of new facilities and other measures to promote sustainable travel modes and reduce car use.

The allocated housing sites and employment sites are located in good proximity to Brixham town centre, or within easy reach of sustainable modes of transport. This will support climate change mitigation through limiting the need for residents or workers to travel by the private car. Furthermore, the BPNP also promotes communications technology, home-based jobs and web-based jobs (Policies J2 and J4); these measures will all help to minimise the need for people to travel.

While it is considered that the policies of the BPNP will promote modal shift to sustainable forms of travel, it is nonetheless recognised that the introduction of 155 new homes may result in an increase in vehicle trips and therefore increase in greenhouse gas emissions. However, this has been minimised through the selection of identified sites that are brownfield sites within the built up area of the Neighbourhood Plan area and their accessibility to sustainable transport options.

The BPNP's focus on the protection and enhancement of designated nature conservation sites, open space and green spaces will promote climate change mitigation through supporting carbon sequestration and promoting sustainable modes of transport; and climate change adaptation by helping to limit the effects of extreme weather events and regulating surface water run-off (Policies E1 to E8). The policies supporting biodiversity in the Neighbourhood Plan area will further help to increase the resilience of ecological networks to the effects of climate change through making provision for improvements to habitats and enhancing such networks.

In regards to both climate change mitigation and adaptation in the Neighbourhood Plan area, the current version of the BPNP promotes sustainable construction, adaptive technologies, eco-innovation and other measures to combat climate change and enable sustainable lifestyles (Policy H7). This will help facilitate the provision of low energy infrastructure in new and existing developments, and ensure developments are resilient to climate change, and do not increase greenhouse gas emissions.

In relation to flood risk in the Neighbourhood Plan area, the addressing of issues linked to fluvial, groundwater and surface water flooding are likely to be supported by the provisions of the NPPF. Likewise, the flood risk, SuDS and surface water flooding policies proposed by the Torbay Local Plan would further help limit adverse effects in this regard.

Of the nine allocated housing sites, four are at potential risk from flooding:

- **Town Centre Car Park** - the majority of the site is located within Flood Zone 3;
- **St. Kilda** - the majority of the site is located within Flood Zone 1; though the site has a watercourse on its north-western boundary comprising small areas of Flood Zone 3.
- **Oxen Cove and Freshwater Quarry** - the majority of the site is located within Flood Zone 2 or 3, this is to the south of the site; while the north of the site is within Flood Zone 1; and

- **Knapman's Yard** - the southern end of the site may be vulnerable to flooding (given a potential overlap with Flood Zone 3), however, it is likely that development would readily be able to avoid this area at risk given the sloping nature of the site.

Proposals for these four sites will therefore need to ensure that appropriate avoidance and mitigation measures are implemented. In this context Policy E9 advocates and supports a multi-agency and multi-professional approach to resolving flood risk issues in the Neighbourhood Plan area. The policy also states that no development will be permitted within flood risk zones or on surrounding land where any increase in runoff and/or foul drainage will exacerbate the problem, unless proposals contain clear mitigation measures.

## 4.5 Historic environment and landscape

A number of the proposed site allocations in the latest version of the BPNP are in locations of sensitivity for historic environment or townscape. This includes the Brixham Town Centre site, the Northcliff Hotel site, the Knapman's Yard site, the St Kilda's site and the St Mary's / Old Dairy site. Negative effects on the historic environment therefore have the potential to take place from site allocations at these locations with inappropriate design and layout.

Allocations at these sites should not necessarily be viewed as a leading to negative effects on the integrity of the historic environment, townscape character and local distinctiveness. In this context, relating to these sites, the following elements apply:

- The Brixham Town Centre site is located within the Brixham Town Conservation Area, and is adjacent to one Grade II listed building. Given the current poor townscape and public realm in the area, development at this location offers significant opportunities for enhancements to the public realm and setting of the historic environment when compared to its current use as a car park.
- The Northcliff Hotel site is located across North Furzeham Road from the Battery Park Conservation Area and a scheduled monument located in Battery Gardens Park. Development at this location offers opportunities for enhancements to the setting of the historic environment when compared to its current use as a derelict plot of land.
- Given its current use as a builders' yard, development at Knapman's Yard provides significant opportunities for enhancements to the setting of the Galmpton Conservation Area
- Whilst the St Kilda's site located within Higher Brixham Town Conservation Area and no. 15 Drew Street (Kilda House) comprises the Grade II listed property on the site fronting the road, development of the site offers the opportunity to rejuvenate the fabric and setting of Kilda House and the surrounding conservation area.
- The St Mary's / Old Dairy site is located adjacent to Norton House (a Grade II listed building) and is in relatively close proximity to the Grade II listed 1, 2 and 3, St Marys Road. Development would need to be sensitive to the historic environment value of the listed buildings' setting. However the site is currently used as a car repair business and is in many respects underutilised. As such high quality design and layout in this location offers significant opportunities for enhancing the setting and fabric of the historic environment.

The other housing sites allocated through the current BPNP are not at locations significantly constrained by historic environment assets or located in areas of sensitive townscapes.

In terms of landscape character, in relation to the nationally designated South Devon AONB, all of the sites with the exception of one (St Mary's / Old Dairy) are located in urban settings and are unlikely to have negative impacts on the setting of, or views from, the South Devon AONB. This reflects a key aim of the spatial strategy of the Neighbourhood Plan to protect and enhance landscape character. However, the St Mary's / Old Dairy site allocation has the potential to have minor effects on the setting of the AONB. In this context, the site consists of two parts: half the site has been previously

developed; the other part is greenfield. The greenfield part is within the South Devon AONB and provides a green context to the designation and this part of the site's green outlook retains the open character of the AONB. However it should be noted that this part of the site is screened from the previously developed part the site by mature trees, and it is anticipated that only the previously developed part of the site will be developed for housing through the BPNP. As such potential effects from this site allocation on the AONB will be minimised.

Further reducing the likelihood of negative effects from new development facilitated by the Neighbourhood Plan on the historic environment and landscape / townscape quality, a central focus of the policies proposed for the BPNP is on protecting and enhancing the quality of the public realm, supporting local distinctiveness, protecting landscape character, and supporting the conservation and enhancement of the historic environment. As such the current version of the BPNP provides a robust basis for the conservation and enhancement of landscape character and townscape character in the Neighbourhood Plan area.

In this context the integrity of the historic environment in the Brixham Peninsula will be supported by the policies which promote high quality design, layout and the provision of features and areas which promote the quality of the public realm. Key policies in this regard are Policy BE1 (Preservation of local character) and Policy BE2 (Alteration or repair of existing structures of heritage value). In this context Policy BE1 seeks to protect features and areas of heritage or archaeological value which are not protected by national and statutory designations. This will be further supported by Policy BE2, which seeks to ensure that development affecting locally important assets and conservation areas is sympathetic to local character; respects existing settlement patterns and building styles; uses high-quality materials appropriate to the architectural, geographic and historic character of the area; enhances the existing fabric of historic buildings and other structures and reinstates '*traditional features that have been lost over time*'. This is particularly significant with regards to the Brixham Town Conservation Area, which is included on Historic England's Heritage at Risk Register, and was evaluated by Historic England as being in a 'very bad' but 'improving' condition. The BPNP therefore complements the provisions of the NPPF and Torbay Local Plan by offering an additional degree of protection to locally important sites of heritage value and historic environment interest in the Neighbourhood Plan Area. These policies will be further supported by Policy H5 (Retention of local character), which: "*seeks to ensure new development reflects local character; keeps in with its surroundings in character, scale, design, height, density and landscaping; utilises local building materials; and complies with the relevant design guidance for the settlement in which it is located*".

In terms of specific locations, Policies J6 and J7 set out a range of provisions for ensuring that new development at the Town Centre Car Park site and Oxen Cove and Freshwater Quarry protects and enhances the historic environment and townscape/seascape character, and Policy J8 seeks to ensure that landscape and villagescape character in Churston, Galmpton and Broadsands is protected and enhanced and the '*sensitive countryside and coastal setting of the Peninsula*' is respected through new development.

The Natural Environment policies will also play a key role in supporting landscape and townscape character in the Neighbourhood Plan area. Policy E1 (Landscape beauty and protected areas) sets out a range of provisions for protecting landscape character and tranquillity in the area, including relating to the integrity of the South Devon AONB, the Coastal Protection Area and the English Riviera Global Geopark. It also provides an impetus to protect and enhance the countryside from inappropriate development. This will be supported by Policy E2 (Settlement boundaries) which limits the scope for development in the open countryside of the Neighbourhood Plan area. However, whilst Policy E2 restricts development in the open countryside, it also acknowledges the importance of rural vitality through enabling the provision of development which supports rural activities such as agricultural, horticultural or forestry operations or rural diversification schemes. In this context the policy will support the active and appropriate management of landscapes in the Neighbourhood Plan area through promoting a living and working landscape, with positive effects for landscape character.

Landscape character will be further supported by the Green Wedges Policy (Policy E3), which seeks to preserve the existing open land separating the towns of Paignton and Brixham and the villages of

Churston, Galmpton and Broadsands. This will help prevent the coalescence of the settlements and help protect their distinctiveness. The policy also seeks to promote a softening of edges between open countryside and the built up areas of the Neighbourhood Plan area. This will help enhance views from open countryside, including from the South Devon AONB.

Key views within, to and from the Brixham Peninsula will also be supported by Policy E6 (Views and vistas), which seeks to '*preserve public views of the townscape, seascape, landscape and skyline that are valued by residents and visitors alike*', and facilitate the undertaking of visual impact assessments to support new development proposals. Landscape and townscape quality will also be supported by the green infrastructure policies, including Policy E4 (Local Green Spaces) and Policy E5 (Open Spaces of Public Value), which will protect and enhance open space in the Neighbourhood Plan area and enhance the setting of the built and natural environment.

## 4.6 Land, soil and water resources

In relation to agricultural land, the nine allocated housing sites, and seven allocated employment sites, are all located on brownfield land. As such there will be no loss of land classified as the Best and Most Versatile Agricultural Land. Furthermore, Policy H4 supports land and soil resources by promoting the reuse and intensification of brownfield sites in preference to previously undeveloped greenfield sites; this will support the efficient use of land.

None of the proposed sites for allocation are within a Minerals Safeguarding Area.

Policies E1 to E8 all relate to the theme of the natural environment, and aim to protect designated sites, areas of landscape sensitivity, and well as promote green space and open space. While these policies do not specifically relate to land, soil and water resources, the policies will help promote and protect these resources, including through the promotion of high quality multifunctional green infrastructure networks in the Neighbourhood Plan area and the protection and enhancement of key landscape features.

Furthermore, Policy H7 regards sustainable construction, adaptive technologies and eco-innovation. This will help reduce resource use.

## 4.7 Population and community

The BPNP presents policies aimed at residential development, including affordable housing. The current version of the BPNP allocates nine sites for housing, with a provision totalling in the region of 155 dwellings. As this is anticipated to meet the requirements of the Torbay Local Plan, it is assumed that this growth quantum will meet the objectively assessed housing needs arising locally; furthermore, the BPNP seeks to provide affordable housing at the same proportion as the Torbay Local Plan.

To provide benefits for the existing population, the BPNP seeks to ensure affordable housing is allocated to residents of the Peninsula whose needs are not met by the market (Policy H2); while Policy E2 puts restrictions on development outside of the settlement boundary, to ensure the settlements within the Neighbourhood Plan area do not become merged. Both these policies have the benefit of protecting existing communities.

The BPNP presents policies aimed at promoting increased employment and supporting the tourism industry in the Neighbourhood Plan area, thereby helping to unlock economic potential and supporting enhancements to employment opportunities.

In terms of the provision of employment land, the policies in the current version of the BPNP set out a range of provisions for ensuring employment land is retained (Policy J1), while also supporting start-up businesses or incubation units (J4), and other measures to support increases in employment (Policy J4). Furthermore, Policy J5 relates to sustaining a vibrant harbour-side economy, incorporating fishing and the marine industry. In addition, the BPNP seeks to ensure that all new major developments

incorporate the necessary infrastructure for new communication technologies (Policy J4). The BPNP also seeks to provide local employment opportunities in the surrounding villages.

Tourism is of central importance to the economy of the Brixham Peninsula, and the BPNP sets out measures to protect land currently used for tourist facilities, where it is economically viable (Policy TO1). These will be supported by the policies protecting and enhancing the historic environment, landscape and townscape, the natural environment and local distinctiveness (Section 4.5).

The BPNP also consists of policies for the redevelopment of two sites: Town Centre Car Park (Policy J6) and Oxen Cove and Freshwater Quarry (Policy J7), the redevelopment of these sites would help support the regeneration of the sites and Brixham town centre. Were there to be a loss of car parking, this would have impacts and so it would be important that proposals addressed this. For example, higher density car parking on part of a site (e.g. multistorey) would free up other parts of a site. It is noted this is proposed in the Town Centre Master Plan for the Town Centre Car Park site.

In terms of the community infrastructure, the policies in the current version of the BPNP set out a range of provisions for ensuring the protection and provision of appropriate services, facilities and amenities in the Neighbourhood Plan area. These include:

- Supporting operational space for voluntary support organisations, and ensuring that new developments do not jeopardise the activities of these organisations (Policy HW2);
- Protect existing educational facilities, including school buildings, playing fields and other educational facilities (Policy L1);
- Matching educational provision of early years and primary school facilities with future demand (Policy L2); and
- Providing training facilities for 16-18 year olds and beyond within the Peninsula (Policy L3).

The BPNP also makes provision for promoting new space for cultural activity, and resisting developments that threaten existing space (Policy A&C1).

## 4.8 Health and wellbeing

The policies of the BPNP will bring a range of benefits for the health and wellbeing for residents. This includes through:

- Protecting local green spaces (Policy E4) and open spaces of public value (Policy E5), and recognising their importance in supporting recreation;
- Promoting cycling and walking to school, using supervised 'walking buses' and 'park and stride' schemes for young people (Policy T3);
- Supporting the retention of health and social care facilities (Policy HW1);
- Promoting housing for healthcare workers (Policy HW3);
- Increasing the availability of outdoor recreation and play space (Policy S&L1); and integrating sport and recreational facilities into new residential developments (S&L3); and
- Promoting water sports and coastal recreational facilities (Policy S&L2).

The redevelopment of Oxen Cove and Freshwater Quarry would involve a short re-alignment of the South Devon Coastal Path, however this is not considered significant, nor an obstacle to development on this site.

## 4.9 Transportation

The BPNP has a close focus on ensuring sustainable travel provision is incorporated within new developments and on minimising car use. In this context the current version of the Neighbourhood Plan proposes the following:

- Employment and residential developments will include safe walking and cycling access, and be located within short walking distance to bus routes, whilst also incorporating provision of off-road cycle ways (Policy T1);
- Employment developments will maximise the opportunity for the sustainable transport of freight, promote sustainable transport use by employees, and be located to minimise commuting distance (Policy T1); and
- Travel plans will be prepared for employment land employing over 10 workers; and home-based jobs, web-based commerce, live/work units and work hubs will be promoted (Policy J4).

In addition, the current version of the BPNP makes provision for the development of sustainable transport links to access Brixham Town Centre (Policy T2). It also promotes sustainable transport and traffic management measures in development schemes, with the aim of minimising traffic within the Brixham Peninsula and the wider area. The BPNP makes provision for such measures to be funded through the use of Section 106 and CIL monies to support sustainable travel measures, with key projects including a new park and ride facility, cycle route, greater separation of motor vehicles and travellers, and alternative mode of transport from the existing park and ride into Brixham.

All these measures would support sustainable travel and minimise car use, traffic and congestion within the Neighbourhood Plan area. This will be supported by Policy J8, which states that traffic generated from employment development in the villages of Churston, Galmpton and Broadsands should not adversely affect the villages or the safety of vulnerable road users.

While the policies of the BPNP will help promote a shift to sustainable modes of travel, and promote new services that will cater for new residents, it is recognised that the introduction of 155 new homes will result in an increase in vehicle trips. This will increase pressures on existing transport infrastructure, and potentially contribute to congestion. However, this has been minimised through the selection of identified sites on previously developed land with access to sustainable transport options.

## 4.10 Conclusions at this current stage

### 4.10.1 Potential significant effects

The assessment has concluded that the current version of the BPNP is likely to lead to **significant positive effects** in relation to the 'population and community' and 'health and wellbeing' sustainability themes. These benefits largely relate to the carefully targeted spatial approach proposed by the current version of the BPNP, the focus on enhancing community provision in the Neighbourhood Plan area and the BPNP's impetus on protecting and enhancing open space and green infrastructure networks. In addition, the allocations proposed through the Neighbourhood Plan will enable significant enhancements to be made to the quality of townscapes and the setting of the historic environment at key locations of existing poor public realm in the Brixham Peninsula, leading to **significant positive effects** in relation to the 'historic environment and landscape' theme.

In relation to the 'biodiversity and geodiversity' sustainability theme, the scope and scale of the proposed policy approaches relating to the natural environment will help ensure that wide ranging benefits in relation to this theme are secured through the Neighbourhood Plan. Whilst the delivery of the allocations through the BPNP will inevitably lead to some minor localised adverse effects in relation to this sustainability theme, the approach initiated by the Neighbourhood Plan will both limit the potential magnitude of adverse effects and secure enhancements. The focus on allocating sites on previously developed land will also bring positive effects in relation to the 'land, soil and water resources theme' through limiting the development of agricultural land, including land classified as the

Best and Most Versatile Agricultural Land. It will also help support the remediation of contaminated land at a number of locations.

The Submission version of the BPNP will initiate a number of beneficial approaches regarding the 'transportation' and 'climate change' sustainability themes. However these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood plan and the scale of proposals.

## 5. What are the next steps?

The BPNP has been submitted to the Local Planning Authority, Torbay Council, for its consideration with the updated Environmental Report. Torbay Council will consider whether the plan is suitable to go forward to Independent Examination in terms of the BPNP meeting legal requirements and its compatibility with the Local Plan.

Subject to Torbay Council's agreement, the BPNP will then be subject to independent examination. The Examiner will consider whether the plan is appropriate having regard to national policy and whether it is in general conformity with the Torbay Local Plan.

The Examiner will be able to recommend that the BPNP is put forward for a referendum, or that it should be modified or that the proposal should be refused. Torbay Council will then decide what should be done in light of the Examiner's report. Where the report recommends modifications to the plan, Torbay Council will invite the BPNP Steering Group to make modifications to the plan, which will be reflected in an updated Environmental Report. Where the Examiner's Report recommends that the proposal is to be refused, Torbay Council will do so.

Where the examination is favourable, the BPNP will then be subject to a referendum, organised by Torbay Council. If more than 50% of those who vote agree with the plan, then it will be passed to Torbay Council with a request it is 'made'. Once 'made', the BPNP will become part of the Development Plan for the Brixham Peninsula.



## Appendix A SEA Evidence Base

## A.1 Policy and plan review

The following policy and plan review comprises the review initially presented in the SEA Scoping Report prepared by Torbay Council, and released for scoping consultation in March 2015.

Overall aim /purpose of the document	Objectives/ Targets	Implication for the Neighbourhood Plan
<b>The National Planning Policy Framework DCLG (2012)</b>		
<p>The National Planning Policy Framework sets out the Government’s planning policies for England and how these are expected to be applied.<sup>1</sup> It sets out the Government’s requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.</p>	<p>Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need. Parishes and neighbourhood forums can use neighbourhood planning to:</p> <ul style="list-style-type: none"> <li>• set planning policies through neighbourhood plans to determine decisions on planning applications; and</li> <li>• grant planning permission through Neighbourhood Development Orders and Community Right to Build Orders for specific development which complies with the order.</li> </ul> <p>Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community.</p> <p>The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.</p> <p>Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area. Once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, the policies it contains take precedence over existing non-strategic policies in the Local Plan for that neighbourhood, where they are in conflict. Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation.</p>	<p>A Neighbourhood Plan or Neighbourhood Development Order must not constrain the delivery of important national policy objectives. The National Planning Policy Framework is the main document setting out the Government’s planning policies for England and how these are expected to be applied.</p>

Overall aim /purpose of the document	Objectives/ Targets	Implication for the Neighbourhood Plan
<b>The Equality Act 2010</b>		
<p>The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society.</p> <p>It replaced previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection in some situations. It sets out the different ways in which it's unlawful to treat someone.</p>	<p>Discrimination can come in one of the following forms:</p> <ul style="list-style-type: none"> <li>• direct discrimination - treating someone with a protected characteristic less favourably than others</li> <li>• indirect discrimination - putting rules or arrangements in place that apply to everyone, but that put someone with a protected characteristic at an unfair disadvantage</li> <li>• harassment - unwanted behaviour linked to a protected characteristic that violates someone's dignity or creates an offensive environment for them</li> <li>• victimisation - treating someone unfairly because they've complained about discrimination or harassment</li> </ul>	<p>The Neighbourhood Plan should ensure that the principles of equality and inclusion are considered when planning for the community.</p>
<b>Torbay Local Plan 2012-2030, Torbay Council 2015</b>		
<p>Adopted in December 2015, the Torbay Local Plan covers the areas of Brixham, Paignton and Torquay.</p> <p>Covering the period 2012 to 2030, provides a framework for how future development across Torbay will be planned and delivered.</p> <p>The five main aspirations for Torbay from the Local Plan are as follows:</p> <ul style="list-style-type: none"> <li>• Secure economic recovery and success</li> <li>• Achieve a better connected, accessible Torbay and essential infrastructure</li> <li>• Protect and enhance a superb environment</li> <li>• Create more sustainable communities and better places</li> <li>• Respond to climate change</li> </ul>	<p>The Local Plan sets out a spatial strategy for Torbay and 'policies for strategic direction'. The spatial strategy for Torbay is set out through provisions for three areas: Torquay, Paignton and Brixham.</p> <p>With Torquay and Paignton, the Local Plan has identified a pool of potential sites for the delivery of housing in the Brixham area. Based on a Strategic Housing Land Availability Assessment, this provides a selection of sites for development which amounts to a capacity of 790 dwellings in Brixham over the plan period.</p> <p>Whilst the Local Plan identifies potential locations for delivering 790 houses in the Brixham area, it also sets out the minimum housing and employment provision it expects to be delivered during the plan period.</p> <p>In this context over the 18 year Local Plan period (2012/13 to 2029/30), the Local Plan requires the provision of at least 660 new homes and requires 2,700 square metres of employment land to be delivered. This is the minimum trajectory to ensure that a rolling 5 year land supply is maintained.</p>	<p>The BPNP must be in conformity with the provisions of the Torbay Local Plan.</p>
<b>A Local Biodiversity and Geodiversity Action Plan 2006-2016, Torbay Council (2006)</b>		
<p>The Nature of Torbay details the 9 priority habitat action plans and 7 priority species action plans for Torbay, describes the issues currently identified as</p>	<p>1. Policy And Legislation</p> <p>Ensure the conservation of Torbay's biodiversity and earth heritage is incorporated in local and regional strategies and plans.</p>	<p>The Neighbourhood Plan and SA should promote the conservation of species and habitats that are important on a local level</p>

Overall aim /purpose of the document	Objectives/ Targets	Implication for the Neighbourhood Plan
threatening these habitats and species and sets out the main objectives and targets for their future conservation.	2. Site Management Maintain and extend site management practices to support Torbay’s LBAP Habitats and Species. 3. Communication and Public Awareness Increase public awareness of and involvement in Torbay’s biodiversity and earth heritage. 4. Research and Monitoring Increase scientific knowledge and understanding of Torbay’s biodiversity and geology resource.	to Torbay
<b>Energy and Climate Change Strategy 2014 – 2019, Torbay Council (2014)</b>		
The strategy reflects key changes that have taken place locally and nationally in recent years. It sets out policies to make the transition towards a lower carbon Torbay with an energy system that is more secure and reduces exposure to energy related cost increases.	The strategy provides a framework for the council and its partners to deal with carbon reduction and resilience to climate change over the next five years. It identifies Torbay’s carbon emissions and reduction targets, considers energy security, implications for the local economy, fuel poverty and resilience measures. There will need to be considerable activity on an unprecedented scale in order to achieve a 34% cut in carbon emissions by 2020 against increasing challenging financial constraints.	The Neighbourhood Plan plays a significant role in meeting its contribution to the UK climate change efforts
<b>Torbay Heritage Strategy , Torbay Council (2011)</b>		
The aim of the Torbay Heritage Strategy is to protect heritage and direct it towards the economic, social and environmental regeneration of Torbay	<ul style="list-style-type: none"> <li>• To protect and enhance historic buildings, archaeology biodiversity, geology, landscapes and museum collections of national and international significance for the benefit of future generations.</li> <li>• To protect and enhance locally and regionally important heritage features including our social heritage and oral history. 3. To create strong partnerships between the public, private and voluntary sectors and a coordinated programme to protect and enhance our heritage.</li> <li>• To support local heritage and amenity groups and private individuals to increase public access to our heritage.</li> <li>• To promote the value and significance of Torbay's heritage to the public locally, regionally and nationally.</li> <li>• To encourage educational establishments and programmes to provide learning opportunities related to our heritage.</li> <li>• To support organisations applying for funding and maximise the opportunities for external funding to benefit our heritage.</li> <li>•</li> </ul>	The Neighbourhood Plan and SA should have regards to the strategy aims and objectives

Overall aim /purpose of the document	Objectives/ Targets	Implication for the Neighbourhood Plan
<b>South Devon AONB Management Plan 2014-2019, South Devon AONB Partnership (2014)</b>		
<p>This document is a statutory Management Plan for the South Devon Area of Outstanding Natural Beauty. It is published in accordance with Section 89 of the Countryside and Rights of Way Act 2000.</p> <p>Preparing a Management Plan is a requirement for every AONB. Its task is to do the following:</p> <ul style="list-style-type: none"> <li>• Highlight the special qualities and significance of the AONB.</li> <li>• Present a vision for the future of the AONB.</li> <li>• Set out policies and objectives to secure the vision.</li> <li>• Identify what needs to be done, by whom, and when.</li> <li>• State how the condition of the AONB and the effectiveness of its management will be monitored.</li> <li>• Reflect the views and aspirations of a wide range of AONB 'stakeholders'.</li> <li>• Co-ordinate the work of different partner organisations.</li> </ul> <p>The Plan is not just an internal document for the AONB Partnership and Staff Unit: an AONB Management Plan has to ensure outcomes for the landscape itself and harness the actions of all who live or work in it, visit it or otherwise have an interest in it.</p>	<p>Elberry Cove, Berry Head and Sharkham Point define the portion of AONB around Brixham included in the Torbay UA territory (1.95% of the total AONB area in the South Devon).</p> <p>The Management Plan's vision for the AONB is as follows:</p> <ul style="list-style-type: none"> <li>• A place valued, recognised and treasured forever for its nationally important natural beauty and distinctive character:</li> <li>• its rugged, undeveloped coastline with wooded estuaries, secluded river valleys, rolling hills, abundant wildlife and rich natural environment;</li> <li>• its distinctive historic landscape character including its patchwork fields, Devon banks and hedges, green lanes, historic settlements and archaeological remains shaped by centuries of human activity and maritime and farming traditions;</li> <li>• its rural tranquillity, dark skies, fresh air, clean water, fertile soils and mild climate;</li> <li>• its living, working countryside where community and economic activity sustain the landscape and bring prosperity and social well-being to ensure a good quality of life for its residents.</li> </ul>	<p>All plans to consider the general aims and specific action and targets of the AONB management plan for the AONB areas part of Torbay.</p>
<b>Torbay Greenspace Strategy, Torbay Council ( 2007)</b>		
<p>The Greenspace Strategy provides a strategic, focused and co-ordinated approach to green spaces in Torbay over the next 20 years. This Strategy forms a Supplementary Planning Document (SPD) in the emerging Local Development Framework for Torbay (LDF).</p>	<ul style="list-style-type: none"> <li>• Improving appearance of green space.</li> <li>• Improving accessibility, especially for the disabled.</li> <li>• Challenging people's perceptions of green spaces as areas to visit and use more often.</li> <li>• Improving facilities and attractions.</li> <li>• Increasing numbers of events/entertainments.</li> </ul>	<p>The Greenspace Strategy informs the Neighbourhood Plan and the SA</p>

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<p>The strategy outlines how the Council in association with the community intends to deliver and maintain high quality green spaces which enable equal access and opportunity for all, as well as protecting and enhancing the local environment.</p> <p>The Strategy supports community priorities. It will also help improve Torbay's biodiversity and reduce crime, litter and graffiti.</p>	<ul style="list-style-type: none"> <li>• Develop opportunities for using green spaces for learning.</li> <li>• Promote and protect the heritage assets of Torbay's green spaces.</li> <li>• Promotion of green spaces as drivers for economic activity.</li> <li>• Recognise, protect and enhance the biodiversity value of green space.</li> </ul>	
<b>Torbay Economic Strategy 2010-2015, Torbay Development Agency (2010)</b>		
<p>The economic strategy is the overarching document setting out the direction Torbay wishes to see the economy move.</p>	<ul style="list-style-type: none"> <li>• Set the strategic direction for economic prosperity in Torbay</li> <li>• Influence and inform policy and investment priorities which affect Torbay including those made by Torbay Council and its partners, regional, national and European bodies</li> <li>• Maximise collective action and partnership working to support the economy</li> <li>• Ensure Torbay Council has a strong narrative to underpin its civic leadership role and increasing accountability for economic development and regeneration working with private, community and voluntary, and other public sector partners</li> <li>• Inform the actions and priorities of the Torbay Economic Development Company</li> </ul>	<p>The Neighbourhood Plan will need to take into account the aims objectives of the Strategy.</p>
<b>Turning the Tide for Tourism in Torbay: Strategy 2010 – 2015, Torbay Development Agency (2010)</b>		
<p>This revised strategy, 'Turning the Tide for Tourism in Torbay' will build on the success of the previous strategy (2005)</p> <p>Moving forward much greater emphasis needs to be placed on market led product development and modernising the current tourism offering.</p>	<p><b>Key priorities:</b></p> <ul style="list-style-type: none"> <li>• increasing need to improve both customer service and quality</li> <li>• increasing importance for partnership working.</li> <li>• increasing need for product development</li> <li>• increasing need to attract new customers</li> </ul>	<p>The Neighbourhood Plan will need to take into account the aims objectives of the Strategy.</p>
<b>Torbay Retail Study Update, Torbay Council (2011)</b>		
<p>This study will replace the 2008 version of the retail study (which in turn replaced parts of the 2006 retail), superseding its quantitative analysis, retail floorspace capacity predictions and recommendations for the Torbay retail strategy. However, some parts of the</p>	<ul style="list-style-type: none"> <li>• To identify available and projected retail expenditure for convenience and comparison goods over the period 2011 to 2031 within Torbay and its retail catchment area.</li> <li>• To identify market share retention rates available to and within the Bay and the constituent three towns, incorporating indicative potential tourism expenditure.</li> </ul>	<p>The Neighbourhood Plan will need to take into account the aims objectives of the study.</p>

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<p>2006 retail study remain, including the parts of the detailed town centre health checks for Torbay’s town and district centres and the town centre traders surveys.</p>	<ul style="list-style-type: none"> <li>• To make recommendations for floorspace thresholds for the scale of edge-of-centre and out-of-centre schemes, which should be subject to an impact assessment.</li> <li>• To make recommendations for potential locally important impacts which could be included within the Councils impact assessment</li> <li>• To provide guidance to the Council on how Torbay can redefine its role in the regional shopping hierarchy, through strategic actions such as major town centre regeneration sites, strategic bulky goods locations, leisure parks, and outlet villages within Torbay.</li> <li>• To provide input in to the Councils emerging growth strategy by providing guidance on Torbay’s Retail hierarchy including likely opportunity for future capacity to be met within the Town Centres, District and Local Centres.</li> </ul>	
<p><b>Torbay Sustainable Energy Assessment, Torbay Council (2010)</b></p>		
<p>The study aims to provide the Council with an evidence base that can support carbon reductions ahead of Building Regulations and deliver a strategic approach to a low carbon Torbay with the creation of Strategic District Heating Areas</p>	<ul style="list-style-type: none"> <li>• Establishing an energy baseline for existing development in the Torbay area;</li> <li>• Present findings on energy efficiency measures for new buildings to meet zero carbon policy;</li> <li>• Evaluate the existing capacity of Torbay’s sustainable energy sector;</li> <li>• Preparing energy mapping of the Torbay area;</li> <li>• Identify large and small-scale opportunities in Torbay for zero and low carbon development;</li> <li>• Use five identified strategic sites to test viability for strategic heat networks compared to individual building measures to meet zero carbon policy;</li> <li>• Present details of Strategic District Heating Area (SDHA) analysis;</li> <li>• Identify proposed planning policy and Council actions to support delivery of Low Carbon Development;</li> <li>• Discuss options for sustainable energy targets using Code for Sustainable Homes or BREEAM standards;</li> <li>• Set out ‘Next Steps’ in the process of delivery.</li> </ul>	<p>The Neighbourhood Plan will need to take into account the aims objectives of the study.</p>
<p><b>Planning Contribution and Affordable Housing: Priorities And Delivery, Torbay Council (2008)</b></p>		
<p>The Planning Contribution And Affordable Housing SPD is a consultation document on how the Council intends to use developer obligations/contributions. The SPD provides detailed guidance on the implementation of Policies in the Saved Adopted</p>	<p>The SPD covers the following matters:</p> <ul style="list-style-type: none"> <li>• Development site acceptability contributions</li> <li>• affordable housing</li> <li>• Sustainable development contributions</li> </ul>	<p>The SPD informs the Neighbourhood Plan and SA</p>

Overall aim /purpose of the document	Objectives/ Targets	Implication for the Neighbourhood Plan
Torbay Local Plan 1995 – 2011.	<ul style="list-style-type: none"> <li>• Implementation</li> </ul>	
<b>Infrastructure Delivery Study, Torbay Council (2012)</b>		
<p>The study seeks to identify, and where possible, quantify the infrastructure requirements for new development. The first aspect of this analysis has been the identification of relevant information across the Bay. This has been followed by analysis of existing capacity information, where available, to identify a net infrastructure requirement.</p>	<ul style="list-style-type: none"> <li>• highlight infrastructure capacity issues and existing capacity where possible, through the review of existing information and consultation with stakeholders;</li> <li>• identify the infrastructure impacts of additional development in generic and location specific terms for main settlements and District basis;</li> <li>• illustrate the net infrastructure impact of new development and provide information on the indicative cost of infrastructure;</li> <li>• identify public funding mechanisms and responsibility for delivery;</li> <li>• identify the potential scope and charge for the for Community Infrastructure Levy through developer viability assessments of residential and non residential development (work presented in Volume 2);</li> <li>• produce infrastructure delivery summaries. This output is considered to be the crucial element of the study, as it draws together evidence and identifies infrastructure funding shortfalls.</li> </ul>	<p>The Neighbourhood Plan will need to take into account the aims objectives of the study.</p>
<b>Torbay Building Heights Strategy, Torbay Development Agency (2010)</b>		
<p>It provides a strategy for the height of new development as well as identifying areas appropriate for tall buildings. It does this by identifying areas that are potentially appropriate for tall buildings, called areas of search, where there are sensitivities to the introduction of tall buildings, called areas with sensitivities, and also where you would not normally expect to find tall buildings, called neutral areas.</p>	<ul style="list-style-type: none"> <li>• To promote Torbay’s image as a beautiful seafront destination through excellence in architecture and urban design;</li> <li>• To strengthen the respective characters of the three settlements of Torquay, Paignton and Brixham;</li> <li>• To provide a stimulus to inward investment and regeneration;</li> <li>• To preserve and enhance strategic views;</li> <li>• To preserve and enhance the outstanding landscape character of Torbay;</li> <li>• To promote environmental excellence in design, construction and management;</li> <li>• To promote sustainable patterns of development;</li> <li>• To reinforce local distinctiveness; and</li> <li>• To ensure residential amenity is not unduly affected.</li> </ul>	<p>The Neighbourhood Plan will need to take into account the aims objectives of the study.</p>
<b>Community Plan–Turning the Tide for Torbay 2011+, Torbay Strategic Partnership (2010)</b>		
<p>The plan has been developed and prepared by the Torbay Strategic Partnership (TSP) on behalf of all the residents of Torbay. It outlines the partnership’s vision for Torbay over the next 20 years bringing together</p>	<ul style="list-style-type: none"> <li>• improved transport links to and within the Bay;</li> <li>• better businesses, better jobs, better pay;</li> <li>• building our reputation for water sport;, encouraging related businesses and better facilities;</li> </ul>	<p>The Neighbourhood Plan should align and coordinate with Torbay community plan</p>



Overall aim /purpose of the document	Objectives/ Targets	Implication for the Neighbourhood Plan
<p>the views of residents as well as representatives from the business, community and voluntary sectors.</p> <p>The plan aims to unlock Torbay’s potential and drive forward its economic prosperity to ensure prosperous communities with a higher quality of life and improved access to jobs. The vision ‘turning the tide’, is directed by four key themes Pride in the Bay, Stronger Communities, Learning and Skills for the Future and, underpinning it all, the New Economy. Brought together the plan focuses on community prosperity for all the people of the Bay.</p> <p>The Community Plan was first launched in July 2007. The 2010 refreshment takes onboard issues that have emerged over the last 3 years.</p>	<ul style="list-style-type: none"> <li>• better education for all, better prospects;</li> <li>• improvements to our harbours and waterfronts;</li> <li>• regenerating the Bay, meeting housing needs</li> <li>• our residents achieve their aspirations;</li> <li>• using our energy efficiently;</li> <li>• a healthy and enjoyable lifestyle for all;</li> <li>• maximising our green spaces.</li> </ul> <p>Four new key challenges have been identified in 2010;</p> <ul style="list-style-type: none"> <li>• Developing our economy, improving job prospects and responding to the recession</li> <li>• Opportunities for older people and the challenges of providing services for an ageing population</li> <li>• Climate Change – reducing our carbon footprint and the increased risk of flooding</li> <li>• Improving quality of life for the least well off in our society</li> </ul>	
<b>Joint Strategic Needs Assessment for Torbay, Torbay Council (2014)</b>		
<p>The <b><i>purpose of JSNA</i></b> is to provide an objective view of the health and wellbeing needs of the population. JSNA identifies “the big picture” in terms of the health and wellbeing needs and inequalities of a local population. It provides an evidence base for commissioners to commission services, according to the needs of the population.</p> <p>A JSNA is not a needs assessment of an individual, but a strategic overview of the local community need – either geographically such as local authority / ward or specific groups such as younger or older people or people from black and minority ethnic communities.</p>	<p>This report provides a narrative overview on the needs of the local population through a life course framework. It is themed around a life course approach using the outcomes frameworks for Adult Social Care, the NHS and Public Health. A life course approach is where the population needs are considered from the different perspectives along the path of life. For example, the needs of babies and those in their early years will be significantly different from those entering adulthood or entering retirement. Undertaking a life course approach allows understanding of community needs for different age groups now, and also enables suggestions for what future population needs may look like.</p>	<p>The Neighbourhood Plan will need to take into account the aims objectives of the study.</p>
<b>Local Transport Plan - Devon and Torbay Strategy 2011 – 2026, Torbay Council (2011)</b>		
<p>The Local Transport Plan 3 (LTP3) is a 15 year plan, covering the period 2011 – 2026. It aims to deliver a transport system that can meet economic, environmental and social challenges. It also seeks to deliver the aspirations of Devon &amp; Torbay Councils,</p>	<p>The strategy has five key objectives:</p> <ul style="list-style-type: none"> <li>• Deliver and support new development and economic growth</li> <li>• Make best use of the transport network and protect the existing transport asset by prioritising maintenance</li> </ul>	<p>The aims and objectives of the plan should be considered in Neighbourhood Plan and SA.</p>

Overall aim /purpose of the document	Objectives/ Targets	Implication for the Neighbourhood Plan
<p>stakeholders, businesses and the public.</p>	<ul style="list-style-type: none"> <li>• Work with communities to provide safe, sustainable and low carbon transport choices</li> <li>• Strengthen and improve the public transport network</li> <li>• Make Devon the 'Place to be naturally active'</li> </ul>	
<b>Devon County Council Waste Local Plan (2014)</b>		
<p>The Devon County Waste Local Plan sets out the County Council's detailed land use policies and proposals for waste management facilities in Devon. The policies provide the framework for a move away from the current reliance on landfill towards more sustainable methods of waste management which recover value from waste: for example, recycling, composting or energy recovery.</p>	<ul style="list-style-type: none"> <li>• To promote public awareness of the problems associated with waste management, and to encourage individuals and communities to take more responsibility for the waste that they create.</li> <li>• To ensure that development and implementation of policy is based on strong scientific evidence while taking into account scientific uncertainty (through the application of the precautionary principle).</li> <li>• To minimise any adverse effects on human health and the environment caused by the introduction of waste management facilities, and to enhance the local environment when considering plans for site restoration, after-use and aftercare.</li> <li>• To ensure that any proposal for a waste management facility is achieved in as sustainable a manner as possible.</li> <li>• To ensure that the management of waste is as sustainable as possible in accordance with the following waste hierarchy</li> <li>• To encourage the provision of waste management facilities at or close to major centres of population, having regard to their effects on local communities and the environment and on the transport infrastructure, taking into account the economic and environmental costs and benefits of using alternative means of transport.</li> <li>• To ensure that, where possible, Devon's waste is treated or disposed of within the County and to provide for facilities with sufficient capacity to manage the County's anticipated waste arisings for at least ten years.</li> <li>• To promote the establishment of an effective and integrated network of waste management facilities to serve national, regional, sub-regional and local needs.</li> </ul>	<p>The Neighbourhood Plan and SA will need to have regard to the Plan aims objectives.</p>

<b>Municipal Waste Management Strategy for Torbay (2007-2025), Torbay Council (2007)</b>		
<p><b>The aims of the strategy are:</b></p> <ul style="list-style-type: none"> <li>• To ensure sustainable waste management to produce a sustainable strategy to manage Torbay’s municipal waste that will balance social, economic and environmental considerations;</li> <li>• To protect public health and amenity to continue the traditional role of waste management in protecting public health and amenity</li> <li>• To provide for waste infrastructure requirements to demonstrate the infrastructure requirements for the collection, recycling and processing of waste which will enable Torbay to plan adequately to meet its statutory duties and targets.</li> </ul>	<p><b>The objectives of the strategy are:</b></p> <ol style="list-style-type: none"> <li>1. To reduce waste growth to reduce the growth of waste in Torbay and to work towards zero waste growth through waste minimization initiatives;</li> <li>2. To increase recycling and composting to increase recycling and composting in Torbay through improved facilities and kerbside collection, and through public education and publicity;</li> <li>3. To divert waste from landfill to divert waste away from landfill in both the long and short term;</li> <li>4. To meet statutory targets to set out how the council intends to meet its statutory performance standards including: targets for recycling and composting, national Waste strategy requirements and EU landfill directive targets;</li> <li>5. To adhere to the waste hierarchy to adhere to the waste hierarchy in all matters of policy; that is;                         <ul style="list-style-type: none"> <li>• Reduce – reduce the amount of waste produced</li> <li>• Re-use – can items be re-used?</li> <li>• Recycle – recycle and compost when re-use is not possible</li> <li>• Recover – recover value (including energy) from waste that cannot be recycled</li> <li>• Final disposal – where no other option is possible</li> </ul> </li> <li>6. To promote self-sufficiency for Torbay to become as self-sufficient as possible, whilst recognising the need to work closely with our neighbouring authorities where this would be of mutual economic and environmental benefit;</li> <li>7. To ensure environmental protection to ensure that services are delivered in a way that protects the environmental quality of Torbay and the wider environment and in particular to reduce the effects of waste on climate change;</li> <li>8. To produce an integrated strategy to ensure that the Municipal Waste Management strategy is integrated with relevant strategies and plans, for example the Torbay community plan and local Development framework;</li> <li>9. To provide best value fulfils the council’s commitments whilst controlling the cost of waste management and delivering best Value commitments</li> <li>10. To promote social inclusion ensure that local community groups, local businesses, residents and visitors are engaged with to achieve the above objectives</li> </ol>	<p>The Neighbourhood I Plan and SA will need to have regard to the strategy aims objectives.</p>

<b>Strategic Flood Risk Assessment, Torbay Council (2011)</b>		
<p>The Level 1 SFRA is an overview of flood risk within a specific area. It aims to provide general guidance to planning officers, developers and other interested people about areas where flood risk is an issue. The Level 2 SFRA builds on the information within the Level 1 SFRA and undertakes an appraisal of the probability and consequences of overtopping or failure of flood risk management infrastructure within the major flood risk areas.</p>	<ul style="list-style-type: none"> <li>• To provide reference and policy document that will be part of the evidence base to inform the Local Development Framework and any subsequent plan;</li> <li>• To ensure that Torbay Council meets its obligation under latest planning guidance PPS25;</li> <li>• To provide reference and policy document for the use by the general public and developers to advise and provide information on their obligation under PPS25;</li> <li>• To use as a tool to inform development control process about the potential risk of flooding associated with future planning applications and the basis for requesting specific Flood Risk Assessment</li> </ul>	<p>The Neighbourhood Plan will need to take into account the aims objectives of the study.</p>
<b>Water Cycle Study, Torbay Council (2012)</b>		
<p>The aim of the Torbay Water Cycle Strategy is to identify any constraints on housing and employment growth planned for Torbay Council up to 2031 that may be imposed by the water cycle and how these can be resolved. Furthermore, it will provide a strategic approach to the management and use of water which ensures that the sustainability of the water environment in the region is not compromised.</p>	<ul style="list-style-type: none"> <li>• Capacity issues with regards to water treatment works, clean water network and water resources in Torbay.</li> <li>• Capacity issues with regards to wastewater treatment capacity and wastewater network (pipe routes) in Torbay.</li> <li>• Potential impacts of future water abstraction and wastewater discharge near water dependent European Sites.</li> <li>• Water quality issues with respect to the discharge of wastewater and surface water, groundwater quality, and management of gravity and pumped discharges within the Torbay administrative area.</li> </ul>	<p>The Neighbourhood Plan will need to take into account the aims objectives of the study.</p>
<b>Contaminated Land Strategy, Torbay Council (2011)</b>		
<p>The Strategy consists of two parts that will run in tandem. The first is the identification of sites where there is immediate concern, because they fit within the priorities set out in this document. These sites will be inspected, and where necessary a programme of remediation set out, to remove the risk. The second part will be about setting up on the Council's Geographical Information System (GIS); a tool to enable quick and effective identification of potentially contaminated sites. This will be completed by June 2006. As the second part is implemented, it is possible that new sites of concern will be identified, and those will be examined at, at that time. An implementation timetable is included within the</p>	<p>The Council's priorities in dealing with contaminated land are to:</p> <ul style="list-style-type: none"> <li>• To protect human health</li> <li>• To protect controlled waters</li> <li>• To protect designated ecosystems</li> <li>• To prevent damage to property</li> <li>• To prevent further contamination of land</li> <li>• To encourage voluntary remediation</li> <li>• To encourage re-use of brownfield sites</li> </ul>	<p>The Neighbourhood Plan will need to take into account the aims objectives of the Strategy.</p>

Strategy.		
<b>South Devon And Dorset Shoreline Management Plan, South Devon and Dorset Coastal Advisory Group (2011)</b>		
<p>A Shoreline Management Plan (SMP) provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks to people and the developed, historic and natural environment in a sustainable manner. In doing so, an SMP is a high-level document that forms an important part of the Department for Environment, Food and Rural Affairs (Defra) strategy for flood and coastal defence (Defra, 2006).</p>	<p>The objectives of the SMP are as follows:</p> <ul style="list-style-type: none"> <li>• to define, in general terms, the risks to people and the developed, historic and natural environment as a result of coastal evolution and behaviour within the SMP area over the next century;</li> <li>• to identify the preferred policies for managing those risks, together with the reasoning behind the choice of those policies;</li> <li>• to identify the consequences of implementing the preferred policies;</li> <li>• to inform planners, developers and others of the risks of coastal evolution and of the preferred policies when considering future development of the shoreline, land use changes and wider strategic planning;</li> <li>• to comply with international and national nature conservation legislation and biodiversity obligations;</li> <li>• to set out procedures for monitoring the effectiveness of the SMP policies; and</li> <li>• to highlight areas where knowledge gaps exist.</li> </ul>	<p>The Neighbourhood Plan will need to take into account the aims objectives of the Plan.</p>
<b>Brixham Urban Fringe Landscape Study, Torbay Council (2011)</b>		
<p>The study focuses primarily on environmental issues but also takes account of the wider issues which affect the town and its economic prosperity. Many of these are related to the location of the town which has limited and often congested access, due to its coastal location at the end of a peninsula with the limited and relatively isolated terrestrial hinterland of the Kingswear peninsula to the south. These geographic factors, combined with the steep topography and AONB designation have constrained the growth of the town which, in turn, has had an impact on jobs, economic prosperity and tourism related development.</p>	<p>The Brief for the study, which has been commissioned by the South Devon AONB Unit working closely with Torbay Council and Torbay Coast &amp; Countryside Trust, includes the following:</p> <ul style="list-style-type: none"> <li>• Provision of an evidence base that will inform the emerging Local Development Framework Core Strategy;</li> <li>• To identify opportunities for repairing and strengthening landscape character;</li> <li>• To identify the optimum functions and purposes that could be provided by land compartments (their “ecosystem services”);</li> <li>• To identify opportunities for securing enhancements through the development system (by conditions to planning permissions, through Section 106 agreements and developer contributions);</li> <li>• Provision of design and land management guidance appropriate to the locality (covering – for example – boundary treatments, planting, pasture management, lighting);</li> <li>• To identify the critical environmental capital of the locality and make recommendations for conserving, maintaining and enhancing the integrity of the various designations;</li> <li>• To identify opportunities for improving connections between Brixham and the</li> </ul>	<p>The aims and objectives of the Study should be considered in Neighbourhood Plan and SA.</p>

	<p>countryside and coastline of the study area, and improve the management of the rural-urban interface;</p> <ul style="list-style-type: none"> <li>• Background research, (including interviews with key stakeholders in the area), was also part of the brief.</li> </ul>	
<b>Brixham Town Design Statement (2010-2015)</b>		
<p>The purpose of a town design statement is to set out the community's aspirations for the design of future development of a town based on an analysis of its character. It is produced by and for the community.</p>	<p>The town design statement will be adopted by the local planning authority as a Supplementary Planning Document that will inform and amplify the policies within the LDF (Local Development Framework). If this can be secured it means that the Town Design Statement will be used by the Torbay Council in coming to decisions on planning applications in Brixham.</p> <p>The statement is a commitment to the future of Brixham and in adopting this document Torbay Council demonstrates its support for the community.</p>	<p>The aims and objectives of the Plan should be considered in Neighbourhood Plan and SA.</p>

## A.2 Baseline review

The following baseline review comprises the review presented in the SEA Scoping Report prepared by Torbay Council, and released for scoping consultation in March 2015.

### Social Characteristics

#### Population and Human Health

The population of the Brixham Peninsula Neighbourhood Plan area is 19,376, with 52% of the population being female (ONS 2012). The population pyramid below shows that the 60 to 64 age category is the largest in Brixham, part of a noticeable 'bulge' around this age. Brixham in particular, as well as Torbay, is a popular retirement location, which is also highlighted by the proportion of bungalows as shown later in this report. There is a smaller 'bulge' in the teenage years, after which there is a significant contraction in numbers in the mid-20s to 30s age range, suggesting that young people leave the area to go to university and consequently begin their careers.

This loss of younger people is of concern for the area. Measures are being taken to provide higher education and employment opportunities through investment in and expansion of South Devon College (located in neighbouring town Paignton) in particular, with the introduction of foundation level degree courses and a new specialist training venue, South West Energy Centre, for the renewable and sustainable construction sectors.

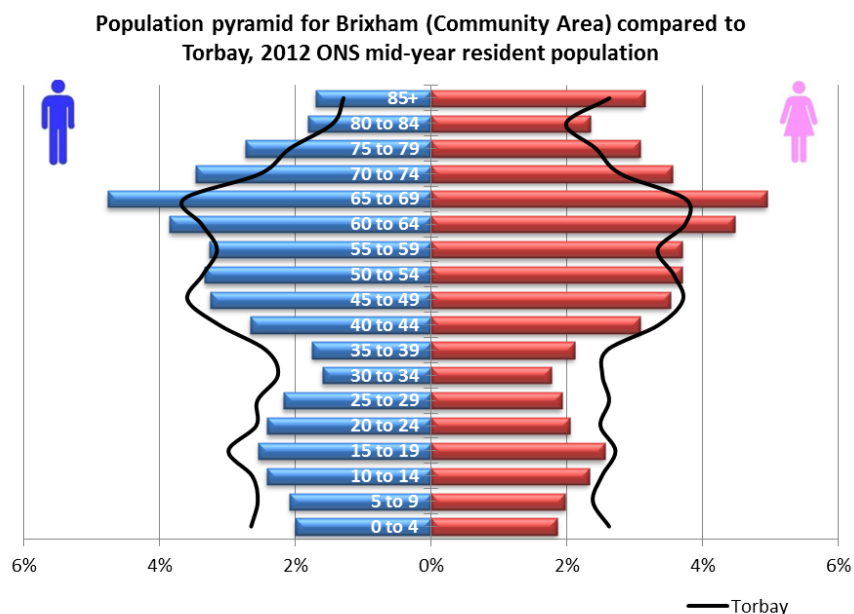


Figure A1: Brixham Population Structure (Source: ONS 2012)

#### Social Inclusion

The Indices of Multiple Deprivation (IMD) are calculated at Lower Super Output Area (LSOA) level, each of these areas having a population of approximately 1500. There are seven domains of deprivation which can be combined to give an overall IMD. LSOAs are ranked, with a lower rank giving a higher deprivation level. In the IMD 2010, five LSOAs within Brixham are ranked in the top 20% to 30% (see Figure A2).

Other parts of Torbay have LSOAs ranked within the top 10%, so compared to these Brixham is fairing well. Actual rankings for the seven domains of deprivation show that only one area of Brixham is in the top 10% for any of these, and that is the living environment domain (see Table A1). The relevant LSOA is marked with the number 1 on Figure A2 and is the location of Brixham town centre and harbour. Four out of the five LSOAs that are within the top 20%-30% overall IMD are within the top 10%-20% in the employment deprivation domain (see Table A1).

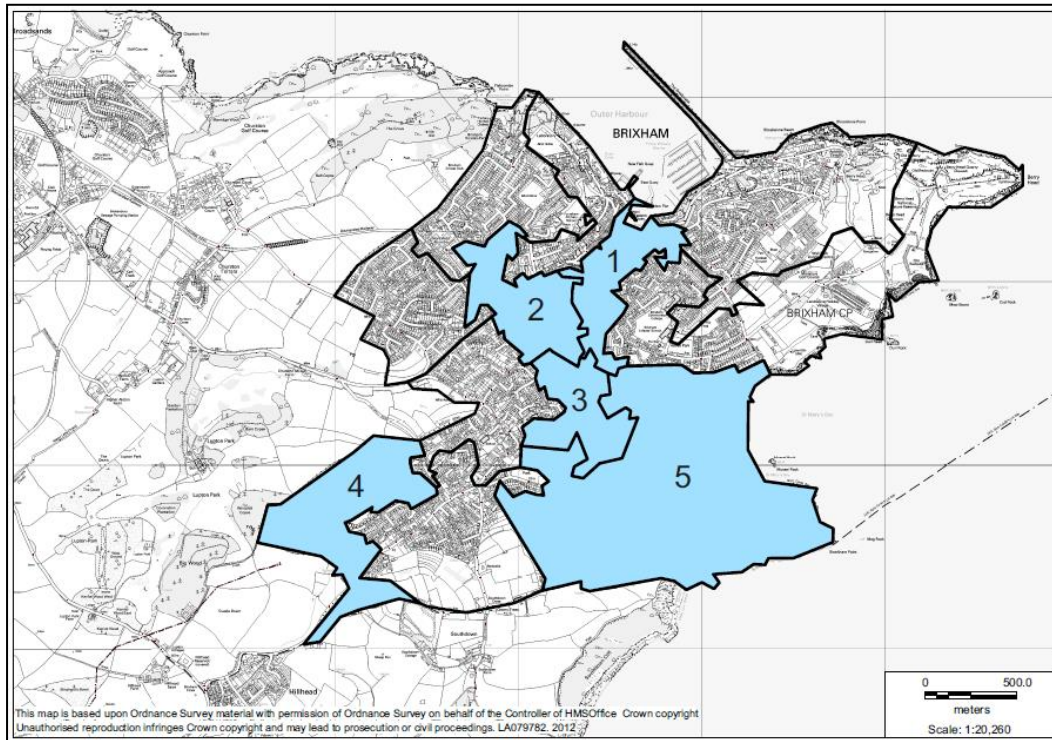
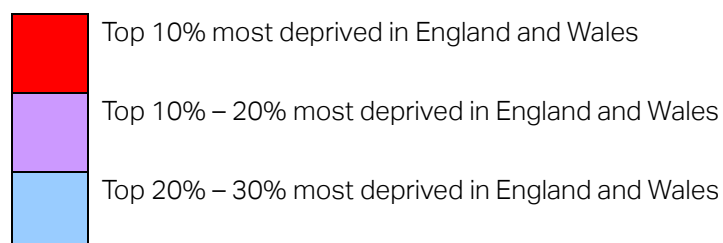


Figure A2: Brixham LSOAs ranked in top 20% to 30% IMD 2010 (source: Torbay Council, 2012)



Table A1: IMD 2010 Brixham rankings for LSOAs in top 20% to 30% overall

LSOA map no.	IMD	Income	Employment	Health & Disability	Education, Skills & Training	Barriers to Housing	Crime & Disorder	Living Environment	Income Deprivation affecting older people	Income Deprivation affecting children
1	6622	7567	4483	6864	9250			1734	7045	
2	8998	8481	6412	9121				6523	7384	
3	7285	7342	4690	7928	7545			3370	7364	
4	8544	7543	4157			6097				7953
5	9400	7700	7743		6025			5868	9030	9608



## 5.1 Economic Characteristics

Fishing (and related industries such as rope making) and farming were historically the predominant industries in Brixham, with fishing continuing to be important to the success of the town to this day, but not as one of the main employment industries (see Table A2 below). Brixham has a thriving fishing industry, having attracted significant investment for the recent redevelopment of the Fish Quay. The town has its own lifeboat.

The main industries of employment in Brixham are manufacturing and 'wholesale and retail trade; repair of motor vehicles'. Manufacturing is likely to be linked to the fishing industry and the Northfield Foundry as well as various small industry businesses located in designated business investment and small business investment areas. Employment in the retail trade is closely linked to the tourism industry, which is another significant element of both past and present day Brixham.

**Table A2: Industry of Employment in Brixham Wards**

<b>Industry of Employment</b>	<b>Number of people aged 16-74 employed</b>	<b>Percentage of people aged 16-74 employed</b>
Managers, directors and senior officials	935	12%
Professional occupations	969	12.5%
Associate professional and technical occupations	812	10.5%
Administrative and secretarial occupations	770	10%
Skilled trades occupations	1220	15.7%
Caring, leisure and other service occupations	1029	13.3%
Sales and customer service occupations	579	7.5%
Process, plant and machine operatives	514	6.6%
Elementary occupations	924	12%

Source: Standard Occupational Classification 2010

### 5.1.1 Fishing Industry

Although accounting for only a small number of employees in Torbay as a whole, fishing plays a vital role in the economy of the vibrant port of Brixham, the country's second largest by value, and third largest by tonnage of catch. Of a population of 19,376, approximately 3,000 people are directly dependent on the fishing industry for their livelihoods. Around 650 of these are fishermen, while the remainder work in support sectors such as fish processing and the marine industry, or are dependants of those in fishing related employment.

Brixham is one of the most important fishing ports in England. Brixham lands 12.8 thousand tonnes of fish, second only to Plymouth. However, the value of the catch (£21.7m) is not exceeded by any other port in England and Wales. Brixham has 216 vessels in its administration. The fleet has a higher proportion of larger vessels than average for England with 75% of the fleet being 10m or under compared to 82% of the English fleet. A report by Ekos Consulting and Nautilus consultants in 2003 showed that 23% of the workforce of Brixham was dependent on fishing. There is an emerging aquaculture sector farming mussels on ropes in the bay. Similarly there is a small processing sector.

The fishing sector is a mature sector and vitally important to the port of Brixham. The new fish market has helped consolidate Brixham's position as one of the most important ports in England with an excellent reputation for the quality of its fish. Opportunities exist to provide better fish processing facilities in Torbay – thus improving the productivity of existing processors and potentially attracting inward investment. The fishing sub-sector represents an important opportunity for further product development, added value and promotion.

## 5.1.2 Tourism

Brixham, like much of Torbay, has experienced growth in tourism over the last 50 years. This has helped to diversify the economy of the town which was heavily reliant on commercial sea fishing, although the industry is still of major importance to the town. During the early 1950's a number of holiday camps were established by companies such as Pontins to the south east of Brixham in what subsequently became part of the South Devon Area of Outstanding Natural Beauty (AONB), and these helped to drive tourism development and the local economy through the latter part of the 20th century. However, changing holiday trends have meant that the 50 year old chalet parks are no longer as popular as they once were.

There are a number of holiday parks, although these are slowly being redeveloped into housing as the industry becomes more competitive, and significant investment is required in the ageing holiday accommodation (see Figure A3 below). The former Dolphin Holiday Park in the St Mary's area has been completed as the Sharkham housing estate, providing more than 200 new dwellings. A further former holiday park, Wall Park, will also be redeveloped into housing. Popular holiday park operators remain in Brixham, such as Park Holidays and John Fowler, as well as independently run holiday parks.

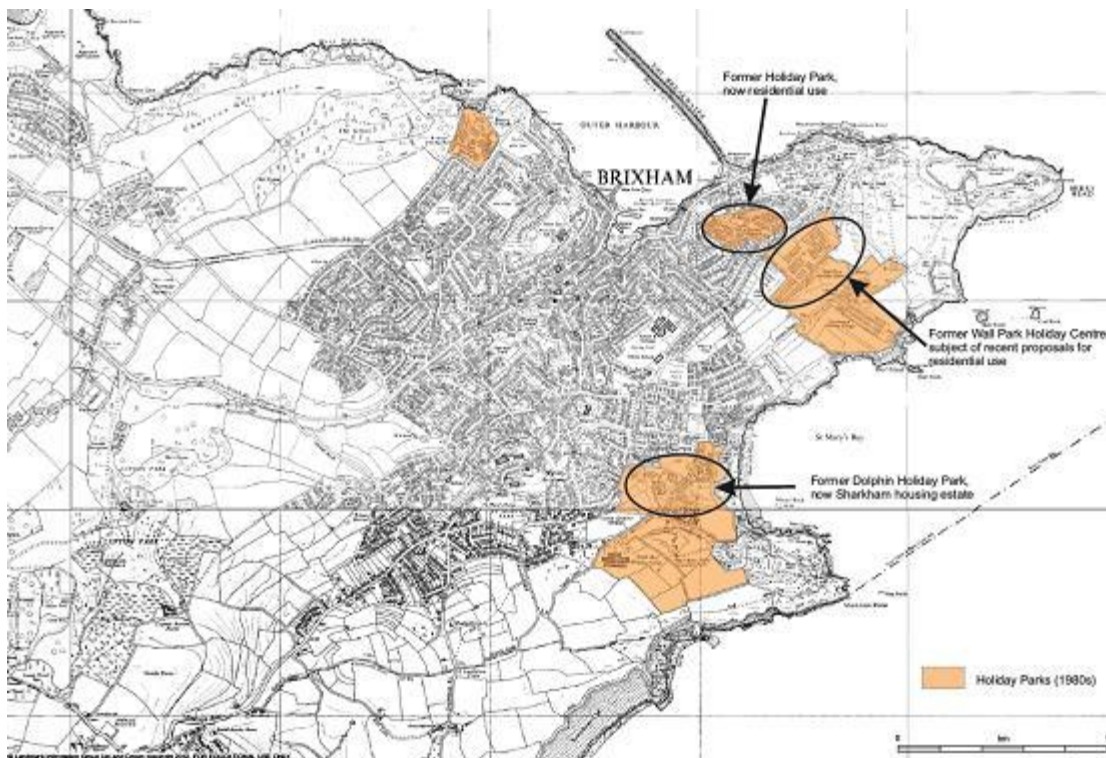


Figure A3: Map of Brixham in 1980s showing location of holiday parks

## Housing

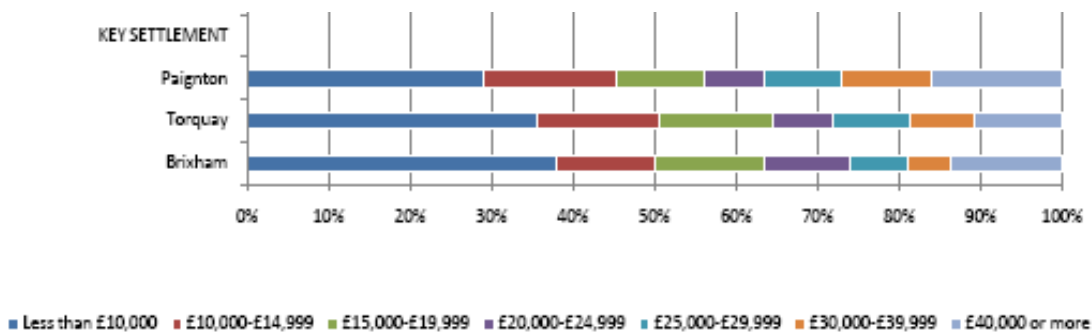
Brixham Peninsula has the highest percentage of dwellings owned outright in Torbay, as can be seen in Table A3 below. The proportion of owner occupied dwellings is nearly double that of Paignton. It also has the lowest proportion of properties rented from a social landlord, possibly due to the fact that, as the smallest town in the Bay, with the most environmental constraints, Brixham Peninsula does not have many large redevelopment sites which might facilitate affordable housing to be required as a planning obligation (currently schemes of 15 units and above in Torbay).

**Table A3: Brixham Housing Tenure**

All categories: Tenure	8944	100%
Owned: Owned outright	4137	46.3%
Owned: Owned with a mortgage or loan or shared ownership	2541	28.4%
Rented: Social rented	598	6.7%
Rented: Private rented or living rent free	1668	18.6%

Source: Nomis 2011

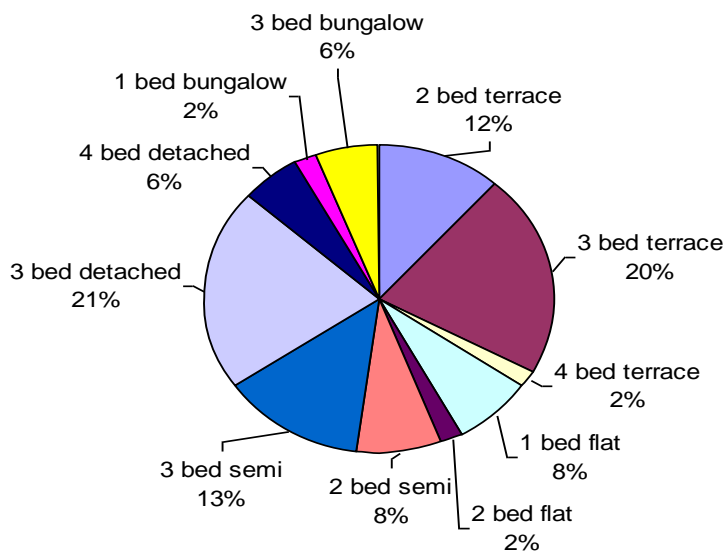
In spite of this, affordable housing is needed in Brixham r, with many families on a low income because of the seasonal and unreliable nature of employment in the tourism and fishing industries. Nearly 40% of households (the highest in Torbay) have an income of less than £10,000 (see Figure A4).



**Figure A4: Household Income** Source: ORS Exeter and Torbay Household Survey – 2006-07

A significant proportion of the housing in Brixham (circa 40%) was built in the 1960s and 1970s). During this time, many of the neighbourhoods surrounding the town were built at a relatively low density, as family housing of bungalows and detached and semi-detached housing (see Table A4).

**Brixham Dwelling Completion Types 2010/2011**



**Figure A5: Brixham Dwelling Completion Types** Source: Torbay Council 2011

**Table A4: Dwelling type**

<b>Accommodation Type</b>	<b>Number (Household Spaces)</b>
All categories: Accommodation type	19039
Whole house or bungalow: Total	16706
Whole house or bungalow: Detached	6737
Whole house or bungalow: Semi-detached	5141
Whole house or bungalow: Terraced (including end-terrace)	4828
Flat, maisonette or apartment, or mobile/temporary accommodation	2333

Source: census 2011

Recent dwelling completions data reveals that Brixham is still providing high proportions of family-sized housing. This situation is re-iterated in the Strategic Housing Market Assessment: Torbay Report which signified that over 40% of Brixham's housing stock is 3 bedroom units.

The need for affordable housing across Torbay is for smaller units of 1 and 2 bedrooms. It was recognised that providing an appropriate mix of housing is important, as is ensuring that it is affordable so that younger people have the option to stay in the town. Although Torbay Council has been providing high proportions of these from the total dwelling completions in the recent past, there is a significant under-provision of affordable housing of this size. Table A5 demonstrates that 79% of housing need in Torbay is for 1 or 2 bed properties, with a total of 3434 households on the housing waiting list.

**Table A5: Housing (Home Choice) Waiting List as at 04.04.12**

<b>Bedroom Need</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>Total</b>
<b>Band A (Emergency)</b>	1	0	0	2	0	0	0	3
<b>Band B (High)</b>	155	98	37	27	16	4	1	338
<b>Band C (Medium)</b>	223	309	170	70	7	0	0	779
<b>Band D (Low)</b>	626	247	90	36	7	2	0	1008
<b>Band E</b>	585	465	236	19	1	0	0	1306
<b>Total in Band</b>	<b>1590</b>	<b>1119</b>	<b>533</b>	<b>154</b>	<b>31</b>	<b>6</b>	<b>1</b>	<b>3434</b>

Source: Torbay Council, 2012

## Energy

Brixham has less energy opportunities than the rest of Torbay (Torbay PPS1 Sustainable

Energy Assessment (2010)). The Energy Opportunities Plan (EOP) for Brixham identifies only a few small unconstrained wind areas, no hydro opportunities and there is a lower residential heat density overall.

There are two unconstrained areas:

- Narrow area on the border with South Hams close to the reservoir off Kennels Road, this site is on the ridge which shelters Torbay from the south westerly winds, therefore it is likely to have

the highest wind energy yield. Also, as shown in the later EOP on bat Constraints, this site is crossed by a bat Corridor which is likely to restrict wind turbine development further;

- End point of Brixham Breakwater, which could be investigated further in conjunction with the Brixham harbour redevelopment, however, the wind speeds would need to be monitored, as the area is generally sheltered.

In summary, there may be a small potential on the Brixham breakwater and a narrow site on the border with South Hams near Kennels Road, west of Brixham.

The EOP shows that the main routes of existing residential heat density are centred around Brixham Town Centre and then the high heat density areas spread outwards along the valley routes: New Road, Bolton Street, Berry Head Road and Overgang Road. There are small clusters of social housing which could provide an opportunity, however they are generally spread-out and are not initially attractive for a district heating network.

There are however large non-domestic anchor loads close to these routes including the Brixham Community Hospital, Brixham Community College and Admirals Swimming Pool. There are other potential sites in the area and this would bring new residential and mixed use development, and heat network pipes could be integrated into the redevelopment infrastructure works. This supports the idea of a Central Brixham heat network.

## Transport

Access to and within the town is a major issue, constrained by a single principal access route into the town at Windy Corner and complicated by associated rat-running. It was accepted that physical constraints mean increasing road capacity is not an option; therefore it has to be about managing movement better and giving people the option to travel by means other than private cars. The idea of "car-free Brixham" was suggested, as was reopening the station at Churston, possibly linked to park-and-ride facilities. It was also noted that access into the town centre and parking for coaches needs to be maintained (Prince's Foundation). There are bus services operated by Stagecoach Devon to Newton Abbot, Paignton and Torquay.

The new ferry service is one of the key projects, which improve connections between Brixham Peninsula and Torquay. A frequent ferry service between Torquay and Brixham will help reduce road congestion and allow more rapid access between the two towns. This would serve both communities and visitors.

## Environmental Characteristics

### Air quality

Although the air quality of Torbay is good, an increasing level of transport related pollutants such as NO<sub>2</sub> fuelled by traffic growth have resulted in the designation of Torbay has relatively low levels of industrial activity and therefore traffic forms the main source of air pollution in the area, in particular levels of nitrogen dioxide. This is likely to remain a key issue as traffic flows are increasing in Torbay on average by 1.4% per annum. This problem is exacerbated in the summer months when roads are placed under strain by an additional 80,000 visitors and tourists.

There are two designated Air Quality Management Areas (AQMAs) in Torbay at the A3022 at Bolton Cross in Brixham town centre and the Hele Road in the north of Torquay. The air quality action plan for these areas focuses primarily on the need to reduce traffic volumes.

## Biodiversity and geodiversity

The Brixham Peninsula area sits within the South Devon Area of Outstanding Natural Beauty (AONB) and it is important for its high quality wildlife and heritage, and as a popular tourist attraction. The value of the natural environment in Brixham is recognised through the high number of nature conservation and geologically important sites; ranging from Special Area of Conservation (SAC) at Berry Head through County Geological sites. Figure A6 shows all the designations in Brixham area.

In addition to land-based designation, Brixham has diverse marine life and has been designated as part of the Lyme Bay and Torbay Marine cSAC and also has several coastal County Wildlife Sites (CWS). Other important marine environments in Brixham includes seagrass beds at Elberry and Fishcombe Cove. The Torbay Marine Conservation Zone (MCZ) also covers the coast of the Neighbourhood Plan area north of Sharkham Point, and the Dart Estuary MCZ is located west of the Neighbourhood Plan area, close to Galmpton village.

The Greater Horseshoe Bat maternity/hibernation roost at Berry Head and the commuting links and surrounding foraging habitats is crucial for bat survival. The commuting links are highly valuable due to constrained nature of the roost at Berry Head and the extent of urban development close to the roost.

Berry Head is a particularly sensitive area with a number of designations including a Site of Special Scientific Interest (designated 1952) and forms part of the Berry Head to Sharkham Point SSSI (designated 2001). This in turn forms part of the South Hams candidate Special Area of Conservation (designated 2000) under the European Habitats Directive. The Guillemot colony is also protected as an Area of Special Protection under the European Birds Directive (designated 1981).

County Wildlife Sites (CWS) and Other Sites of Wildlife Interest (OSWI) are non-statutory sites and important in retaining the green space, which has high nature conservation value and provide opportunities for the public to have access to and learn about wildlife.

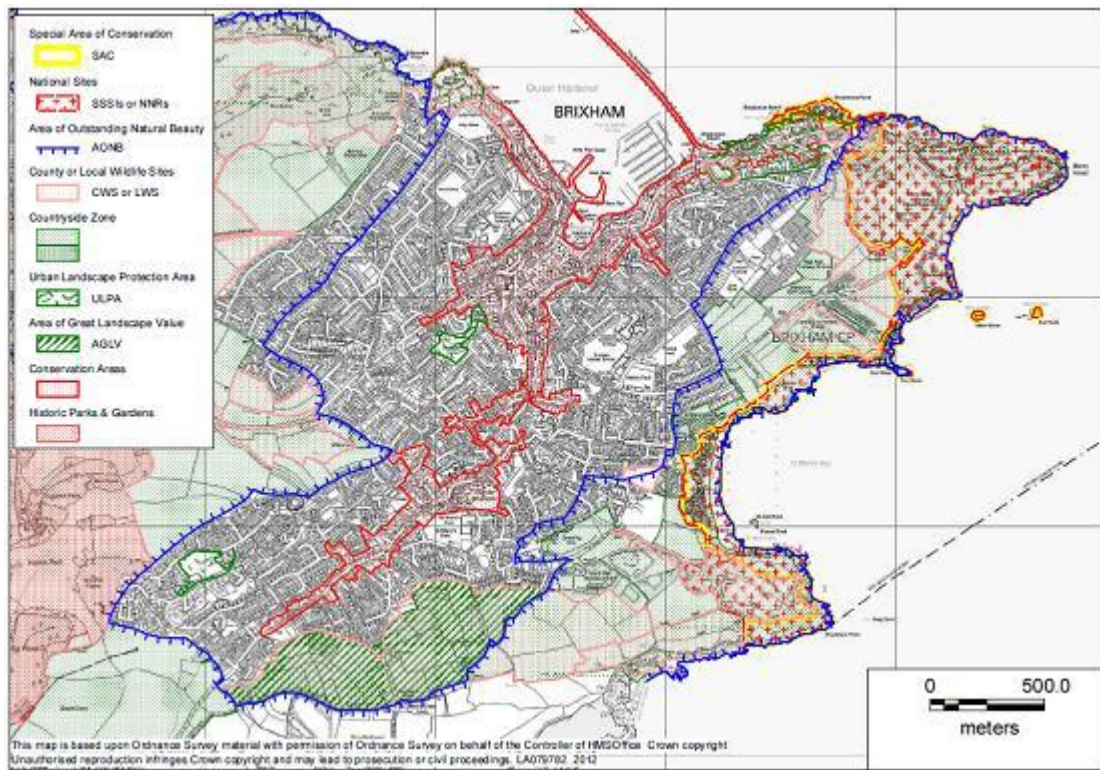


Figure A6: Brixham Environmental constraints

source: Torbay Council 2004

## Cultural Heritage

Brixham Peninsula evolved from the Saxon 'Brioc's Ham'. Higher Brixham was originally a rural settlement while in Lower Brixham; fishing has been a major industry for at least 900 years. The shape of the bay creates a safe anchorage and this fact has directly influenced its history and development (Torbay Heritage strategy 2011).

Local distinctiveness of Brixham Peninsula historic environment is fundamental in maintaining its role as a tourist resort, a significant sector of the local economy. The historic environment (Figure A6) encompasses designated assets and undesignated features of local historic interest, as well as the potential for as yet unrecorded archaeological interest.

Torbay with its rich urban heritage contains 24 such designated conservation areas: 16 in Torquay, 4 in Paignton and 4 in Brixham Peninsula. Those in Brixham Peninsula include Churston Ferrers, Brixham Town, Higher Brixham and Galmpton, which have been designated due to their special architectural or historic character and should be preserved and enhanced. It is recognised that buildings in some conservation areas, often of low density, are becoming subject to inappropriate development including extensions, change in boundary features and building design. This has been exacerbated by the need for housing, which has placed additional pressure for development.

Listed buildings are recognised to have special architectural or historic interest. They are placed in one of three grades, which give an indication of their relative importance - grade I, grade II\* or grade II. There are a large number of listed buildings Grade II in Brixham Peninsula, 7 Grade II\* and no Grade I see Table A6 below. Information on the 827 grade II listed buildings in Torbay can be found at [www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)

There is one Registered Park and Garden in Brixham Peninsula. Lupton Park Grade II\* is a late 18 century parkland landscape and mid 19 century formal gardens associated with a late 18 century mansion remodelled in the mid 19 century. A mid 20 century country house designed by Oswald Milne is set in mid 20 century formal gardens within the park.

**Table A6: Brixham Peninsula heritage**

<b>Grade II*</b>	<b>Scheduled monuments</b>	<b>Regionally Important Geological sites</b>
Aylmer, Milton Street	Ashhole Cavern	Breakwater
Church of St Mary the Virgin, Church Road	Berry Head Fort and Battery and Hardy's Head Battery (01)	Brixham Cavern
Church of St Mary the Virgin, Drew Street	Berry Head Fort and Battery and Hardy's Head Battery (02)	Brokenbury Quarry in Churston Ferrers
Churston Court	Windmill Hill Cave	Churston Cove / Point
Lupton House	The Old Redoubt and later Victorian rifle range target, south west of Berry Head Fort	Sharkham Point to Berry Head.
Ramparts, counterscarp revetment, glacis, musketry wall of southern fort, Berry Head	World War II Emergency Coastal Battery and remains of a Victorian practice battery at Battery Gardens.	
Ramparts, revetments, north battery platform, north and south musketry walls of northern fort Berry Head.		

Sources: [www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)



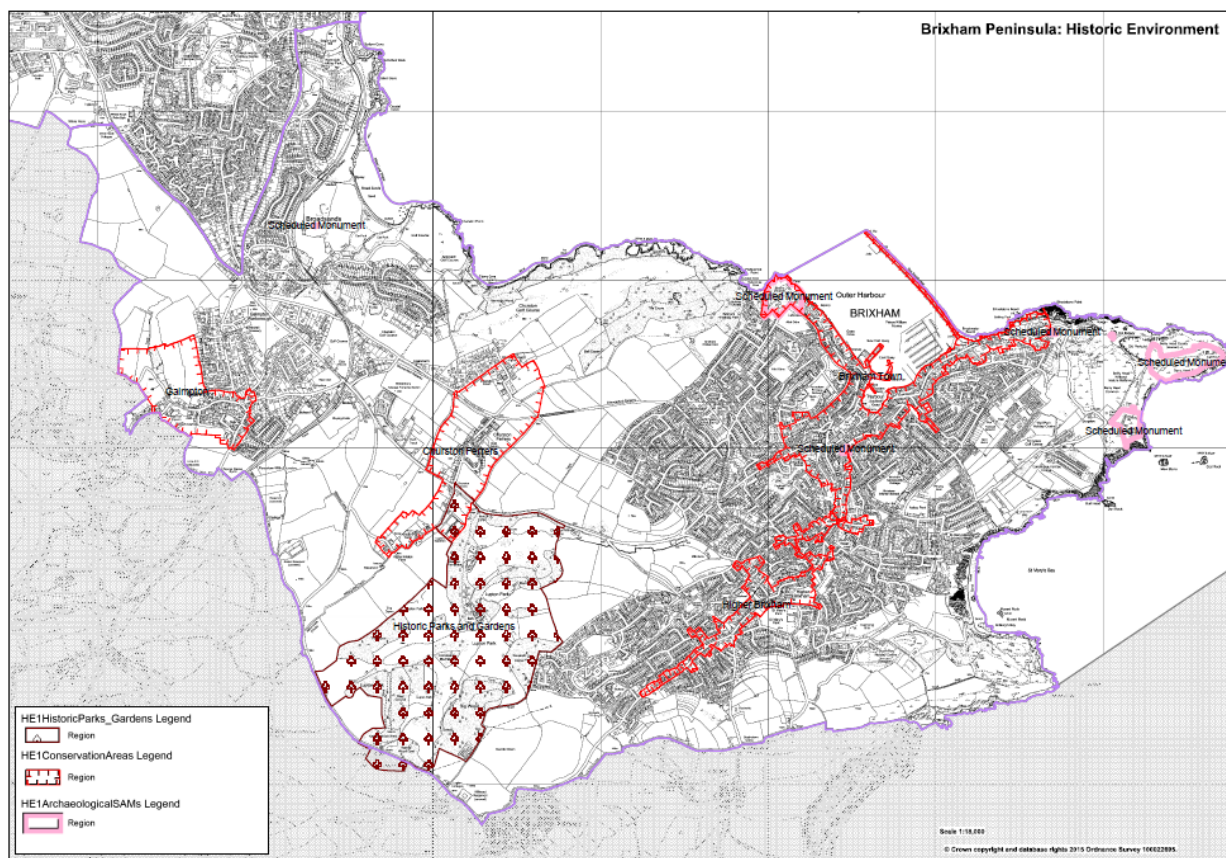


Figure A7: Brixham Peninsula historic environment

## Landscape

Brixham Peninsula landscape's has been described in detail in the Torbay Landscape Character Assessment. It includes five different landscape types, which were subdivided into thirteen individual Areas of Local Character (Figure A8). These include rolling farmland, level farmland, secluded valley, low lying coast and beaches, open coastal plateau, cliff and uninhabited islands/rocks. These landscapes are protected by various designations including two county designations; Area of Great Landscape Value (AGLV) and Coastal Prevention Areas (CPA).

The land surrounding Brixham Peninsula is designated as the South Devon Area of Outstanding Natural Beauty (AONB), which is home to exceptional range of flora and fauna and cultural heritage. There is a requirement to protect these areas from increased traffic, lighting, noise and pollution.

Landscape value is not just restricted to the countryside; Brixham Peninsula has a number of Urban Landscape Protection Areas (ULPA) designated on a local level. They can be vantage points, amenity open spaces or landmarks.

The rich geological heritage of Torbay coast has led to creation of the English Riviera Geopark covering the whole of Torbay coastline. Geoparks are supported by UNESCO through the European Geopark Network. The designation aims to protect geo-diversity and promote geological heritage to the general public as well as to support sustainable economic development of the area, primarily through the development of geological tourism.

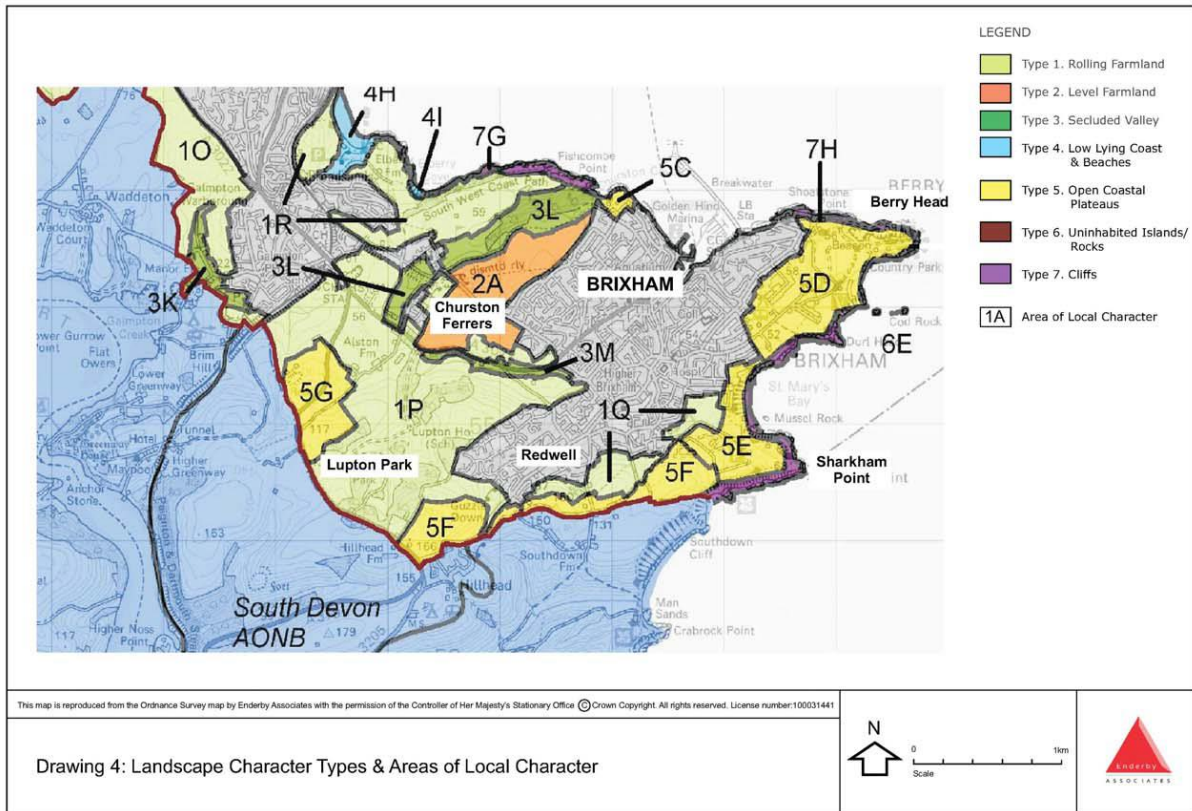


Figure A8: Areas of Local Character (Source: Brixham Urban Fringe Landscape Study)

## Flood risk

Areas in Brixham harbour around Furze Lane, the Strand and Pump Street are included in flood risk zone 2 and 3. This area currently experiences little flooding except in times of exceptionally high tides. The Higher Brixham Watercourse has a history of flooding and although has only a small floodplain it has potential to flood many properties due to the high-density nature of this urban area. There is a risk of flooding to people and properties from the south to Goodrington Sands to Broadsands railway and wetland area.

Brixham Peninsula has a number of means by which to deal with flooding through both hard and soft engineering. There is a coastal defence located at Broadsands beach. There is also a flood defence located along Laywell Reservoir in Higher Brixham watercourse. St Mary' Park has potential for flood storage through its natural inundation or manmade Sustainable Draining Schemes.

Government policy is moving towards 'soft engineering' and avoidance of development in flood risk areas and the allowance of managed retreat. As Torbay's economy is dependent upon the beaches and the directly adjacent tourist infrastructure, managed retreat is therefore unlikely to be an option here. Instead future emphasis is aimed at prevention or minimisation of development in high-risk areas.

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