

Torbay Local Plan: 'Excluded' Sites

Introduction

'Excluded' sites do not feature in the new Local Plan for a reason. All of them have significant environmental constraints and/or have proven themselves to be difficult to deliver. This might be because of a national policy presumption against development (e.g. sites in AONB), impact mitigation is difficult to achieve (e.g. because the level of acceptable development isn't viable), because the land owner is not willing to develop or, quite simply, because the site - in its existing state - forms such a valuable contribution to the Bay and the sustainability of its communities that it should not be developed.

Consequently these sites should only be included in the new Local Plan if the Inspector considers that more land is required to enable Torbay to meet objectively assessed housing needs.

However, that should not be read as implying the sites should only be used for housing. Their environmental sensitivity, or other delivery related issues, makes it all the more important for sites to deliver against a range of national and local policy objectives – environmental improvements, economic benefits, green infrastructure delivery for example.

On balance, the Council's officers consider that it is better to allocate a large, deliverable (albeit sensitive) site – such as land south of White Rock – than it is to allocate a series of small sites (e.g. Sandringham Gardens and Nutbush Lane) where the sensitivity of the site makes it very difficult to deliver relatively small numbers of new homes. In addition, whilst some Council owned car parks (which in total could provide 553 spaces) score relatively well because they are urban brownfield sites, the impact of their development upon the vitality and viability of town centres etc must be taken into account.

The summary provided in the following pages is based on the Council's sustainability appraisal of each of the 34 sites and officers professional assessment of key delivery issues.

A list of the 34 sites is included on page 2 of this document. The list is geographically split. This is complemented by the maps included at the end of the document, with the 'excluded' sites shown in yellow.

Page 3 of this document includes a diagram showing the Council's opinion of the priority / deliverability of each site in relation to its environmental sensitivity.

'Excluded' sites:

Torquay

1. Sladnor Park
2. King George V Playing Field
3. Nut Bush Lane

Car parks

4. Chilcote Close
5. Hampton Avenue
6. Princes Street
7. Sheddon Hill
8. The Terrace
9. Brunswick Square
10. Meadfoot Road
11. Lower Union Lane
12. Walls Hill

Paignton

13. Bloors Site, Collaton St Mary
14. Sandringham Gardens
15. Land South of White Rock
16. Car Boot Sale site, Collaton St Mary
17. Jackson land, south of St Mary's Park, Collaton St Mary
18. Land west of Yalberton
19. Yalberton Holiday Park
20. Manor Farm, Galmpton

Car parks

21. Station Lane
22. Clennon Valley*
23. Preston Gardens
24. Paignton Harbour
25. Churchward Road
26. Victoria car park**

Brixham

27. Brokenbury
28. St Mary's
29. Copythorne Road
30. Mathill Road
31. Wall Park extensions

Car parks

32. Oxen Cove
33. Freshwater
34. Shoalstone

Priority / deliverability	Torbay Local Plan 'excluded' sites	Potential Yield	Cumulative
	Land south of White Rock	355	
	Sladnor Park, Torquay	25	
	Victoria Car Park, Paignton	60	
	Station Lane / Great Western Car Park	35	
	Terrace Car park, Torquay	20	
	Lower Union Lane Car Park, Torquay	20	
	Paignton Harbour Car Park	50	
	Churchward Car Park	15	
	sub total	580	580
	Sandringham Gardens	20	
	Preston Gardens Car Park	20	
	Sheddon Hill Car Park	50	
	Princes Street Car Park	10	
	Brunswick Square Car Park	13	
	Chilcote Close Car Park	10	
	Meadfoot Road Car Park	20	
	Bloors site, Collaton St Mary	50	
	King George V Playing Field	100	
	St Mary's Brixham	50	
	Nut Bush Lane	30	
	Shoalstone Car Park	6	
	sub total	379	959
	Brokenbury	75	
	Clennon Valley Car Park	100	
	Hampton Avenue Car Park	12	
	Walls Hill Car Park	6	
	Oxencove & Freshwater Car Parks	100	
	Jackson Land south of St Mary's Park	200	
	Land west of Yalberton	500	
	Car Boot Sale site, Collaton St Mary	75	
	Manor Farm, Galmpton	100	
	Yalberton Holiday Park	125	
	Copythorne Road, Brixham	80	
	Mathill	20	
	Wall Park Extensions	100	
	sub total	1493	2452

Note: Where the document refers to a spread of numbers on site (e.g. 100 - 200) a mid point figure is used (e.g. 150)

Site	Potential yield	SHLAA Ref.	Summary comments (including SA and policy implications)
Torquay			
Sladnor Park	20 - 30	13037	<p>The site is located some distance from a significant settlement and, although served by the A379, there are no proposals to upgrade the wider highway infrastructure in the vicinity (i.e. T23 Northern Distributor Road in the Adopted Local Plan is no longer proposed). It scores positive for reducing the need to travel, affordable housing and infrastructure objectives. There are significant negative impacts concerning biodiversity and landscape, as it is located within a largely undeveloped coastal landscape. The site has previous planning permissions, including for a substantial retirement village which has not been delivered, and is shown in Appendix D of the Local Plan as a site with planning permission. The Council, and to a degree the community (see emerging Neighbourhood Plan), considers that there could be scope for a small hotel and some discrete 'enabling' housing development, which would fit with and support the character of the area. The ecological impacts of the development would need to be mitigated on site.</p> <p>The site is being promoted by the landowners and is therefore deliverable, albeit for a relatively low level of development that respects the above constraints.</p>
King George V Playing Field	Up to 100	T921	<p>The site is fairly accessible and within close proximity to key services. However, the site has significant constraints. Development of the site would reduce the land available for recreational use (and the tests in NPPF paragraph 74 apply), but some of the recreational space is of poor quality and needs improvement (to which development could contribute). The wider area, which includes the site, is considered to be of less sensitive landscape than many parts of Torbay, although the eastern part is more sensitive due to relationship to Coastal Plateau. There is a CWS along the eastern and southern edge of the site. The site is located within a largely undeveloped coastal landscape. It is important that any development of this site is considered in the context of the Council's Playing Pitches and Sports Facilities Strategies, which is likely to recommend investment in King George V playing fields, and Sport England requirements. If the site is promoted for development, such development should help deliver better facilities for Torquay Golf Club, which has the potential to provide a national and international venue for women's golf.</p>

Site	Potential yield	SHLAA Ref.	Summary comments (including SA and policy implications)
Nut Bush Lane	30	T728 & T731	The site is fairly accessible and within close proximity to key services (including a local centre and surgeries within moderate walking distance). It is however surrounded by Cockington estate and includes part of the Cockington Country Park at the northern, southern and western sides. The site is very visible and in an area of highly sensitive landscape. Development of the site would result in loss of Grade 3b agricultural land and would be considered as urbanisation of a highly visited and highly valued country park.
Chilcote Close & Hampton Avenue car parks	10 +12	HC062 & HC064	These two sites are brownfield land within a close proximity to key services and therefore could reduce the need to travel by car. The sites are unlikely, because of their size, to meet the requirements for affordable housing provision. Development would not cause adverse impact on biodiversity. However, both car parks provide essential parking for the St Marychurch District Centre. There may be scope for limited development of part of Chilcote Close, although this raises additional access difficulties.
Princes Street & Walls Hill car parks	10 + 6	HC070 & T788	<p>Prince's Street site is in close proximity to Babbacombe Downs and Babbacombe Local Centre. It is well used serving Babbacombe Downs and nearby shops, eateries etc, although there is ample on-road parking in the area. There would be amenity issues from overlooking, although careful design may overcome these somewhat. The car park is close to the Babbacombe Cliffs SSSI, but development would not affect this or the coastal landscape. Consequently, there is greater potential for development at Princes St, subject to retention of the majority of car parking spaces within any new development, but overall the numbers of new homes achieved are likely to be low.</p> <p>The Walls Hill site is slightly further away from the Local Centre, although still within walking distance. The site is in close proximity to Babbacombe Cliffs SSSI and Hope's Nose and Walls Hill SSSI as well as Asheldon Copes OSWI. Development would not relate particularly well to the built up area, and may appear obtrusive. However, if sensitively managed development could avoid adverse impact on biodiversity.</p>
Sheddon Hill car park	Up to 50	HC076	The site is fairly accessible and within close proximity to key services. Development of the site would not negatively affect biodiversity. However it is in close proximity to Torre Abbey Sands, conservation area and Princess Gardens and Rock Walk registered Historic Park and Garden. It is an important car park for day visitors to the Bay, who come to visit the beaches, theatre and nearby restaurants or walk along the promenade

Site	Potential yield	SHLAA Ref.	Summary comments (including SA and policy implications)
			and into town for a range of activities. So, if the site does come forward for development, such development should secure retention of the majority of numbers of car parking spaces. As it is located within a tourism investment area, it may be better suited to tourism related business than to residential development.
The Terrace car park	Up to 20	HC090	The site is accessible and within close proximity to key services. It is located on the edge of Torquay Town Centre and close to the harbour. Development of the site would not negatively affect biodiversity. However there is a flood risk area at the southern edge of the site. The final draft Torquay Town Centre masterplan shows that it is possible to clad the front (Torwood Street) elevation of the car park with residential units, whilst also retaining this important business, visitor and shopper car park. Development should not result in the significant reduction in the number of existing parking spaces.
Brunswick Square car park	10-15	HC105	The site is fairly accessible and within close proximity to key services in the Torre Local Centre. Development of the site would not negatively affect biodiversity. The eastern part of the site is adjacent to flood risk zone. The car park is important in meeting the needs of local businesses, visitors and shoppers to/in Torre. Consequently, development should not result in the significant reduction in the number of existing parking spaces.
Meadfoot Road car park	20	HC156	The site is fairly accessible and within close proximity to key services and within the town centre. Development of the site would not negatively affect biodiversity. There is a flood risk are close to the north of the site. The site provides valuable car parking facilities, especially for the night time economy and business needs. Consequently, development should not result in the significant reduction in the number of existing parking spaces and the availability of parking should be considered in conjunction with other car parks in the vicinity of the Torquay Harbour. In addition, trees around the site, which are add quality to the townscape, should be retained.
Lower Union Lane car park	20+	T782	A town centre site with good service and local amenities, suitable for high density development – as illustrated in the final draft Torquay Town Centre masterplan. The site will provide homes with a mix of other uses. It could provide mixed use development including commercial/retail and affordable housing, which will assist town centre regeneration and create job opportunities. Ideally the site should be developed in conjunction with other regeneration sites, in accordance with the Town Centre

Site	Potential yield	SHLAA Ref.	Summary comments (including SA and policy implications)
			<p>Masterplan.</p> <p>The site scores significant positive for access, biodiversity and landscape. Small part of the site is within flood risk area. The car park is heavily used by businesses and shoppers. Consequently, development should not result in the significant reduction in the number of existing parking spaces. If, as suggested in the final draft Torquay Town Centre Masterplan, the car park serves an enhanced retail provision, more parking spaces might be required.</p>
Paignton			
Bloors Site, Collaton St Mary	50 (in addition to the 30 shown in the emerging m'plan)	13219	<p>The whole site is within GHB sustenance zone and most of it is within GHB flyway. Ramshill CWS lies at the north east of the site. The valley is highly sensitive to development and the least sensitive parts of the area are already indicated in the draft Masterplan. Clennon Valley watercourse runs through the eastern and north east edge of the site and Yalberton watercourse runs in the south west of the site. Both watercourses are classified as main rivers. Development of the site would result in loss of agricultural land. Consequently, development potential is limited to the lower slopes adjacent to existing development and the village (see final draft masterplan). In addition the development will need to contribute to infrastructure improvements, flood alleviation, green infrastructure and ecology improvements (e.g. GHB flyway).</p>
Sandringham Gardens	20+	13198	<p>The site is fairly accessible, is likely to provide some affordable housing and reduce the need to travel by car. The site could accommodate limited change in areas adjoining the existing housing. It considered of moderately sensitive landscape. The site is located between two watercourses, Hollicombe Stream to the north and SW and Occombe Valley to the south and west of the site. Increased hard surface in the area could increase the risk of flooding. The site is greenfield land. The western edge is adjacent to Occombe Valley Woods LNR. The site is within the Occombe Woods East OSWI. Development of the site would result in loss of designated agricultural land. The site is a popular local greenspace, adding value to the local community, and its development may therefore conflict with paragraph 74 of the NPPF.</p>

Site	Potential yield	SHLAA Ref.	Summary comments (including SA and policy implications)
Land South of White Rock	250-460	T756b	<p>The area lies within GHB sustenance zone. Manor Farm OSWI is adjacent to the south west edge of the site. The northern part of the site is designated as Long-term Environmental Monitoring Program (LEMP). Development of the site could result in loss of large areas of Grade 1, 2 and 3a agricultural land. Most of the site is open to views from the AONB to the west and south. The southern area slightly less sensitive due to visual containment.</p> <p>The site is fairly accessible and of a sufficient size to provide a critical mass of community benefits, particularly affordable housing, employment and green infrastructure. It could beneficially link into to the first phase of White Rock to the north. The site was considered as part of a call-in by the Secretary of State (in 1996-7 (P/1995/1304: SW/P/5183/220/4), but was rejected by the Inspector (and S of S) because of concerns about impact on views from the AONB, albeit in the context of employment (Class B1) buildings. However, it forms a natural extension to the approved development at White Rock. The 2013 SHLAA considered the area as being suitable for development for 250 dwellings. Initial feasibility and Masterplanning work by the landowners suggests it may be possible to overcome or mitigate some, if not all, of the landscape impacts, deliver employment space, environmental improvements, infrastructure improvements and access into the countryside. This suggests that 460 dwellings are achievable on the land, as part of a mixed use development. The site is being promoted and experience of sites elsewhere along the Western Corridor (within Policy SDP3) shows that it is likely to be highly deliverable.</p> <p>Impending (and funded) improvements to key parts of the Western Corridor will ensure this is an accessible site.</p> <p>The Council's reasons for not proposing the site are set out in the Schedule of changes to Proposed Submission Plan suggested by Torbay Council (Vol 1). However, if the reasons for the 1997 refusal can be overcome, and the significant sensitivities of the site can be overcome, it is considered to offer the best opportunity for delivery of sustainable development of sites not included in the Submission Local Plan.</p>

Site	Potential yield	SHLAA Ref.	Summary comments (including SA and policy implications)
Car Boot Sale site, Collaton St Mary	75 (in addition to the 75 units in the emerging m'plan)	T720	<p>The site is close to a primary school, community hall and pub. There is a secondary school and employment facilities within moderate walking distance, and supermarkets within close (driving) distance. However the site is located at some distance from other facilities such as local shops, although delivery of the Collaton St Mary Masterplan is likely to benefit from the critical mass of community facilities.</p> <p>The whole site is within GHB sustenance zone and most of it is within GHB flyway. Development of the site could result in loss of agricultural land Grade 2. Yalberton Valley watercourse (classified as main rivers) runs close to the north and east of the site. The site is in an area of land visually contained from much of the wider surrounding area by higher land; however the west of the site is considered to be much more sensitive in landscape terms than the eastern part of the site.</p> <p>The final draft masterplan for Collaton St Mary shows how some development could be delivered on the eastern part of the site, providing benefits to Collaton St Mary as a place to live, without significant impact on a landscape that is very sensitive to change. So, further development above that promoted in the Collaton St Mary Masterplan, is likely to have a significant adverse impact on the environment. There is significant local concern about flooding and sewer capacity.</p> <p>The Council recently refused planning permission for around 175 new homes on the whole site. Any additional development will need to deliver ecological and environmental improvements, infrastructure improvements and better access to the countryside. In particularly it would need to safeguard GHB corridors.</p>
Jackson land, south of St Mary's Park, Collaton St Mary	200+		<p>Development of this site is not supported by the SHLAA but has subsequently been promoted by the landowner to the Local Plan, although no yield is indicated.</p> <p>The site is distant from local services, and therefore new development could increase the need to travel by car. Development will involve loss of large areas Grade 2 and 3a agricultural land (very good and good). The whole site lies within GHB sustenance zone and the north west part of the site lies within 250m of bat flyway. Yalberton Quarry</p>

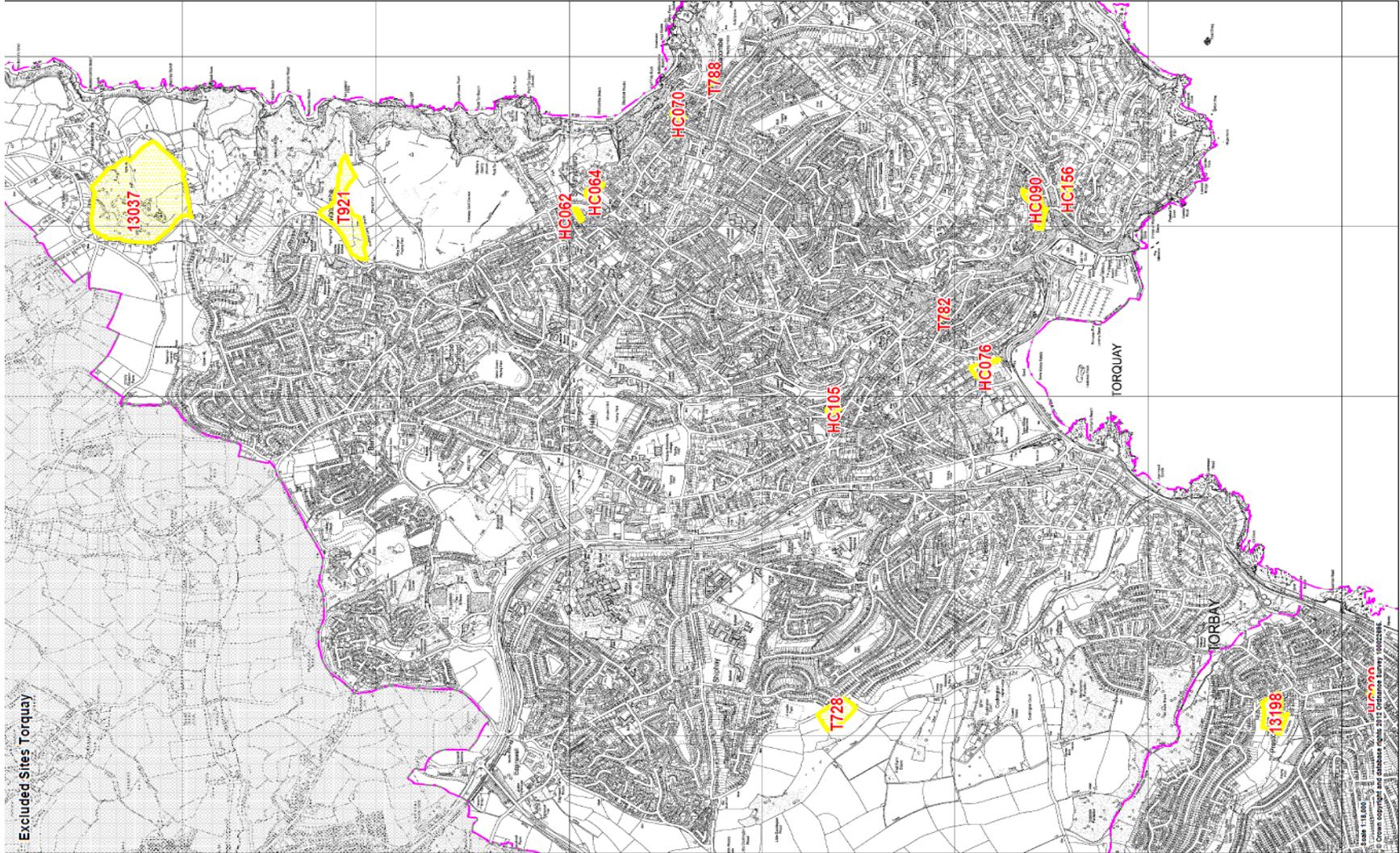
Site	Potential yield	SHLAA Ref.	Summary comments (including SA and policy implications)
			<p>OSWI is adjacent to the southern edge of the site and Yalberton stream runs adjacent to the eastern edge of the site.</p> <p>The site lies in an area highly sensitive to change. There is limited visibility to the AONB, however the site would obtrude into the Yalberton Valley and South Hams. It would be difficult to accommodate any significant development without harm to the area's intrinsic character, and in particular the distinctive historic hedgerows patterns and small lanes. The Council considers the area is incapable of delivering residential development without causing harm that would significantly outweigh the benefits of development.</p>
Land West of Yalberton	500	T792a	<p>This land to the west of Paignton was promoted to the SHLAA (T792a). The site, as a whole, includes land within South Hams District Council's remit and would raise cross boundary issues. However approximately 25 ha is within Torbay. The site is rejected by the SHLAA due to remoteness and lack of infrastructure.</p> <p>The site would urbanise and dominate the Yalberton Valley and have a negative impact on the setting of Stoke Gabriel and the AONB. It would be difficult to accommodate any significant development without harm to its intrinsic character, and in particular the distinctive historic hedgerows patterns and small lanes. Yalberton Watercourse (main river) runs through the western edge off the site. The Council considers the area is incapable of delivering residential development without causing harm that would significantly outweigh the benefits of development.</p>
Yalberton Holiday Park	125	T768	<p>The site is isolated and distant from local services, and therefore new development could increase the need to travel by car. The whole site lies within GHB sustenance zone. The site is adjacent to Stoke Hill Road and Whitehill Lane potential CWS. There is limited visibility to Yalberton Valley from the AONB, however the area to the east of Yalberton Valley is open to views from the west. It would be difficult to accommodate any significant development without harm to its intrinsic character, and in particular the distinctive historic hedgerows patterns and small lanes. Yalberton Watercourse (main river) runs to the west of the site. Development of the site is likely to erode the character of the 'hidden gem' of Yalberton Valley, which the Council and community wants to see improved (in environmental terms) and made more accessible for sustainable tourism.</p>

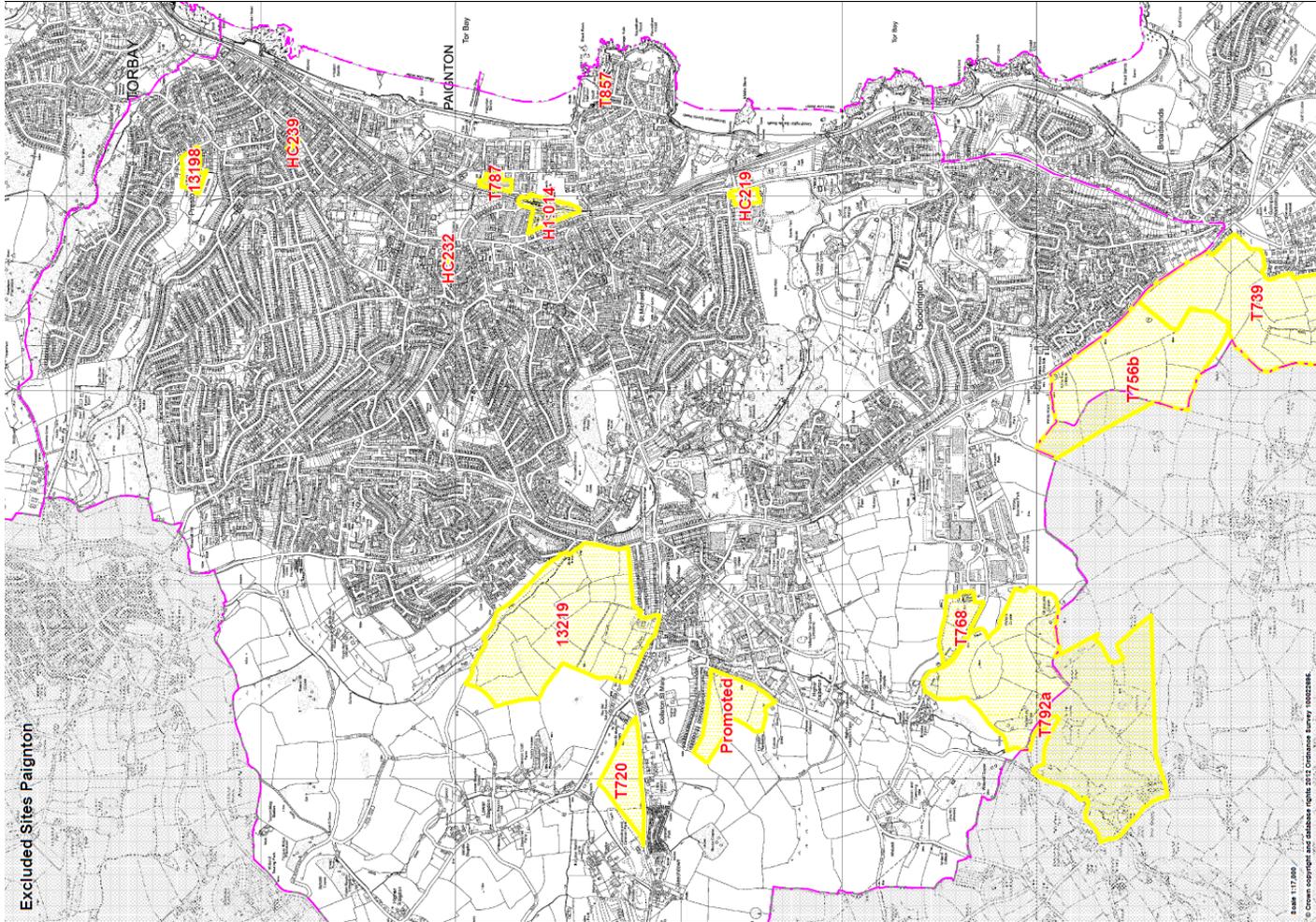
Site	Potential yield	SHLAA Ref.	Summary comments (including SA and policy implications)
Station Lane Great Western car park	20- 50	H1:014	The site is highly accessible by public transport. The site is brownfield land within the urban area and therefore would not negatively affect biodiversity or landscape. The site is within a flood risk area. The site is promoted in the final draft masterplan for Paignton Town Centre and in the adopted Local Plan, for mixed use development, but primarily employment space (which is otherwise in limited supply in Paignton town centre). As such the residential yield is likely to be relatively low and probably significantly below the maximum figure of 50 units.
Clennon Valley car park	100	HC219	The site is fairly accessible and is located within area of search proposed for sport facilities in the Local Plan. The site is brownfield land within the urban area and therefore would not negatively affect biodiversity. The southern part of the site is within flood risk area. The whole of the Clennon Valley area is being promoted and developed for tourism, sport and recreation. Loss of car parking spaces would have a negative impact on the existing and future use of this area.
Preston Gardens car park	20	HC239	The site is brownfield land within the urban area. It is within easy walking distance of the District Centre and is highly accessible. Development would not negatively affect biodiversity. However, it is located within flood risk area and is close to Occombe Valley watercourse. Increased hard surface in the area could increase the risk of flooding. The need for parking serving the District Centre would need to be reviewed, although there is on-street parking in the vicinity.
Paignton Harbour	50	T857	The site is fairly accessible, brownfield land within the urban area and therefore would not negatively affect biodiversity. The site is adjacent to Paignton Harbour and Roundham Head SSSI and also adjacent to flood risk area. However, redevelopment of buildings in the harbour is unlikely to directly affect the SSSI. The site could accommodate mixed use development, with retail / workshop units on the ground floor, as suggested in the final draft Paignton Town Centre Masterplan. However, the majority of car parking spaces would need to be retained, as the emerging Masterplan includes proposals to increase visitor numbers around the harbour. Such a development could help deliver public realm improvements around Paignton Harbour. Careful design would be essential to maintain the character of the Conservation Area and the charm of Paignton Harbour.

Site	Potential yield	SHLAA Ref.	Summary comments (including SA and policy implications)
Churchward Road car park	15	HC232	The site is brownfield land within the urban, within a walking distance from a local centre. Unlikely to cause adverse impact on biodiversity and landscape. The site is located within flood risk area.
Victoria Square Car Park	60	T787	The site is accessible being within the town centre and close to the Esplanade. The site, and other adjacent land, offers huge potential to support regeneration of the town centre. The site is located within a flood risk area but has no negative effects on biodiversity or landscape. The final draft Masterplan for Paignton Town Centre indicates this site, and other sites alongside, could provide a much needed regeneration project, including the relocation of the Vue Cinema from the seafront, new homes, office and commercial space. As such commercial use, possibly with residential above is likely to represent the best use of the site.
Manor Farm, Galmpton	100	T739	Development of the site, which is high visible open countryside, would result in loss of large areas of Grade 2 and 3a agricultural land (very good and good). The whole area is within curl bunting 2km buffer zone and the south west part is within 250m buffer zone. It is also within GHB sustenance zone. Manor Farm OSWI is adjacent to the south west edge of the site and protected species has been recorded within the site. The site lies within an area that is highly sensitive to change, although parts of the southern area slightly less sensitive due to visual containment. Most of the site is open to views from the AONB to the west and south. The site is not within flood risk area; however Galmpton Watercourse (main river) is adjacent to the southern edge of the site. As such the site is not considered appropriate for development, especially if the site to the south of White Rock is considered acceptable for development as the adverse cumulative impacts of both developments would be significant.
Brixham			
Brokenbury	75	T717	The site is connected by public transport and within close proximity to other key services. Part of the site lies within a land classified as Grade 2 agricultural land. The site is also within GHB sustenance zone. Churston Railway CWS lies at the northern edge of the site. The site lies in an area highly sensitive to change, although parts of the southern site slightly less sensitive due to visual contaminant. Most of the site is open to views from the AONB to the west and south. The site is not within flood risk area, although Churston Watercourse (main river) runs to the east of the site. The site is also very important in terms of preventing coalescence between Churston and Broadsands and, as such, protecting the rural character of these villages. The site

Site	Potential yield	SHLAA Ref.	Summary comments (including SA and policy implications)
			has been identified in the new Local Plan as providing much needed recreation facilities. As such, alternative space would need to be found for these facilities if this scale of residential development is to be delivered on the site. This has proven difficult to date and the most likely alternative location is within the AONB. In addition, access to the site (from the east) is poor and alternative access, potentially from the west (off Brixham Road) would need to be provided.
St Mary's, Brixham	50	H1.21 and add'nal site	<p>Access to the site is restricted and is served by narrow roads with several sharp bends. The site lies in an area with multiple environmental constraints and is an environmentally sensitive site. It lies within South Devon AONB, GHB sustenance zone and flyways. However, whilst within the AONB, it could be considered as slightly separated from the main AONB rolling landscape. The site itself is not located in a surface water flood risk area.</p> <p>Development of the site would involve of loss camping pitches. Notwithstanding these significant sensitivities, some development of the site could be possible if it included refurbishment / replacement of some existing employment space with new employment space, a relocation of the camp site (potentially to the southern side of the site), highway improvements, ecological and environmental improvements. In particular the safeguarding of greater horseshoe bat flight paths, plus an improved tourism and employment space, will be essential ingredients of development.</p>
Copythorne Road	80	13241	The site lies in an area with a number of environmental constraints. It is situated within South Devon AONB and the whole site classified as Grade 2 agricultural land. It is also a greenfield site within an area of Brixham Limestone that forms part of the New Local Plan Mineral Safeguarding Area and there are other biodiversity constraints. Consequently, whilst it appears to provide a natural extension to Brixham, the sensitivities and value of the site (e.g. for agriculture, AONB) are such that the site is considered unsuitable for development.
Mathill Road	20	13259	The site is on the edge of the built up area and not particularly close to local facilities. It lies in an area with multiple environmental constraints. It lies within South Devon AONB, GHB sustenance zone and flyways, classified as Grade 2 agricultural land, greenfield land. The site itself is not located in a surface water flood area. There is however a functional floodplain within 250m (Lupton watercourse and Higher Brixham watercourse to the north). As such the site is not considered appropriate for development. Part of

Site	Potential yield	SHLAA Ref.	Summary comments (including SA and policy implications)
			the site is proposed for a “green” cemetery in the existing Local Plan 1995-2011, although this has not been implemented.
Wall Park extensions	100	T703 & T712 13233	<p>The site is adjacent to the main Wall Park site, where the Council has resolved to grant planning permission (subject to completion of a S106 Agreement) for 165 dwellings.</p> <p>The site is within South Devon AONB, it forms an important buffer between edge of Brixham and the NNR. Most of the site is within Berry Head Farm OSWI. It is also within GHB sustenance zone and most of the site is within the tracked bat flyway. Redevelopment of the site could increase recreational pressure on the South Hams SAC. The site is within South Devon AONB. The landscape of the site is highly sensitive to change. The site also lies on an area of Brixham Limestone that forms part of the New Local Plan Mineral Safeguarding Area. The Council has recently resolved to grant planning permission for development of the former holiday park at Wall Park, which followed extensive negotiation with the applicants and environment organisations to secure a proposal that carefully balances development with environmental sensitivities. Further development, of ‘Wall Park extension’ sites would represent development beyond the environmental capacity of the highly sensitive area.</p>
Oxen Cove & Freshwater car parks	50 +50	HC245 & T858	The two sites are located on brownfield land within the urban area and are fairly accessible. Both sites are within the GHB sustenance zone and adjacent to the Battery Ground OSWI. They are also located within flood risk area. The sites are also the best sites in Torbay for marine related employment (see Policies TO3 and C2 and supporting text of the Submission Local Plan) and there is significant interest in use of the sites for that purpose. The sites also provide much used and important parking for visitors to Brixham. A funding bid, currently with the HoSW LEP (under Growth Deal 2), could unlock the site for employment use by allowing some relocation of car and coach parking.
Shoalstone car park	6	T816	The site is brownfield land within the urban area and is fairly accessible. However, it is within GHB sustenance zone and adjacent to Berry Head SAC and Berry Head Farm OSWI. The site is within flood risk area.





Excluded Sites Brixham Peninsula

