

TORBAY LOCAL PLAN - A landscape for success: The Plan for Torbay – 2012 to 2032 and beyond

PROPOSED SUBMISSION PLAN (FEBRUARY 2014)

PROPOSED MAIN MODIFICATIONS TO THE SUBMISSION LOCAL PLAN

LIST OF REPRESENTATIONS BY PERSON/ORGANISATION IN TOPIC ORDER

Consultee ID	File No.	Person /Organisation Consultee
843212	P1	Torbay Coast and Countryside Trust
438366	P2	South Devon AONB Partnership

843212 P1

David Pickhaver
Strategic Planning Team
Spatial Planning Business Unit
Environment
Torbay Council
Torquay



Torbay Coast & Countryside Trust

23 March 2015

Dear David,

Re: Torbay Local Plan Modification Consultation

Thank you for giving us the opportunity to comment on the modifications to the Torbay Local Plan.

Our main concern is the allocation of new greenfield sites for development due to the increased figure for housing of 10,000. We are particularly concerned about the land identified south of White Rock and St Mary's campsite, Brixham as development sites.

Both these sites are highly constrained due to being located within the Greater Horseshoe bat foraging zone and within a strategic flyway for the Greater Horseshoe bat. The Greater Horseshoe Bat roost at Berry Head National Nature Reserve is highly sensitive to development pressures and the loss of available foraging habitat, particularly as the roost is located on a headland, surrounded on two sides by sea. The bats flyways from the roost are also highly vulnerable to light pollution as they abut urban areas and the flyway to the south of the roost is already at a critical pinch point.

We cannot recommend these sites are proposed until a detailed assessment and surveys are undertaken to ensure no impact to the Greater Horseshoe bat. The assessment also needs to take into account the cumulative impact of loss of habitat alongside other developments that are proposed or planning agreed within the foraging zone and strategic flyways. The impact from loss of habitat on other species such as the Cirl Bunting also needs to be assessed as this is loss of more farmland habitat on which this bird relies.

The area at White Rock was also identified in the Torbay Green Infrastructure Plan as being appropriate for a new Country Park, due to the communities in the area not having access to accessible natural greenspace. This should be considered for the future health and wellbeing of the local communities.

Please do not hesitate to contact us should you require further information.

Best wishes,

Alex Scholefield
Education and Policy Manager



Pickhaver, David

From: Alex Scholefield [REDACTED]
Sent: 23 March 2015 15:03
To: Pickhaver, David
Cc: Damian Offer
Subject: RE: Torbay Local Plan Main Modifications
Attachments: consultation comments on Local Plan 23.pdf

Dear David,

Please find consultation comments from TCCT attached. Apologies I did not make the 9am deadline – I hope you can still take our comments into account.



Best wishes,

Alex Scholefield
Education and Policy Manager
Based at: Ocombe Farm

[REDACTED]

Torbay Coast & Countryside Trust | Ocombe Farm | Preston Down Rd | Paignton | TQ3 1RN | Tel: 01803 520022



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Head Office: 21 Old Mill Road | Torquay | TQ2 6AU
Registered Charity No. 1077561

From: Pickhaver, David [REDACTED]
Sent: 20 March 2015 16:18

[REDACTED]

Subject: Torbay Local Plan Main Modifications

Dear all

I note that you made a representation on the Proposed Submission version of the Torbay Local Plan, but we do not appear to have received a comment for you on the Proposed Modifications.

Just a reminder that the deadline for comments on the above is 9.00 AM on Monday 23rd March 2015.

Regards

David Pickhaver
Senior Strategic Planner,
Strategic Planning and Group,
Spatial Planning
Environment and Place
Torbay Council
Postal address: Electric House, Castle Circus ,Torquay,TQ1 3DR
Tel: [REDACTED]
Fax: [REDACTED]
E m: [REDACTED]
Web site: www.torbay.gov.uk/ldf

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438966



The South Devon AONB Unit, P2
Follaton House,
Plymouth Road, Tornes,
Devon. TQ9 5NE

Torbay Local Plan
Strategic Planning Team
Torbay Council
Electric House
Castle Circus
Torquay TQ1 3DR

Date: 22nd March 2015

Dear Sir/Madam

**Consultation response to Torbay Local Plan 2012-2032: A landscape for success
Main Modifications).**

Thank you for inviting AONB office comments on the proposed main modifications to the Torbay Local Plan.

Land South of White Rock

We have substantive concerns over "Main Modification 3" and "Policy SS3 New Future Growth Area, Land South of White Rock". Whilst not within the designated area for the South Devon AONB the site forms an important element of the setting to the South Devon AONB and therefore its special qualities as defined in the South Devon AONB Management Plan 2014-2019. It is our view that development of "Land South of White Rock" has the potential to result in harm to the nationally important protected landscape of the South Devon AONB.

Sustainability Appraisal entries identify the area as:

- being highly sensitive to change;
- open to views from the AONB to the west and the south;
- resulting in the loss of best and most versatile agricultural land;

Mention is given elsewhere in the Local Plan documentation to the use of Land South of White Rock to protect and enhance the rural backdrop to the area. However, it would appear that there is insufficient robust information relating to views into the area from the west and south (from within and across the South Devon AONB).

If this site is to continue to be considered for allocation, we strongly urge the development of a robust evidence base including a comprehensive landscape and visual impact assessment, in advance of allocation, to ensure that the site could be developed without harm to the natural beauty and special qualities of the South Devon AONB.

St Mary's Campsite

This site has previously been identified within the Brixham Urban Fringe Study as one that would be highly sensitive to the development of buildings higher in nature than the present single storey caravans. We strongly urge the development of a robust evidence base including a comprehensive landscape and visual impact assessment, in advance of allocation, to ensure that the site could be developed without harm to the natural beauty and special qualities of the South Devon AONB.

Without a sufficiently robust evidence base to warrant the inclusion of these sites we feel it necessary to raise a holding objection at this stage in relation to these two sites, until such time that it can be demonstrated these sites will not cause harm to the South Devon AONB.

Please do not hesitate to contact me if you require further clarification.

Yours sincerely,



Roger English, South Devon AONB Project Officer

General notes.

1. *This response presents the views of the AONB Staff Unit. It does not necessarily represent the views of member organisations of the wider AONB Partnership Committee, some of which may be involved in making their own separate representations.*
2. *This response is based on the policies and objectives of the statutory South Devon AONB Management Plan.*

Pickhaver, David

From: Roger English [REDACTED]
Sent: 23 March 2015 08:44
To: Pickhaver, David
Cc: Robin Toogood; Ross Kennerley
Subject: RE: Torbay Local Plan Main Modifications
Attachments: Modifications to Torbay Local Plan SD AONB office response March 2015.pdf

Dear David,

Please find attached our consultation response to the Torbay Local Plan Proposed Modifications.

Regards,
Roger



Roger English | Project Officer

Electric House, Plymouth PL1 1TA, Devon, TQ9 5NF



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Download our free new app from [iTunes](#) or [Google Play](#)

From: Pickhaver, David [REDACTED]
Sent: 20 March 2015 16:18

To: Ward, Carlisle; local@devon-council.gov.uk; James Deverick; Strategic Planning [REDACTED]



Subject: Torbay Local Plan Main Modifications

Dear all

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Just a reminder that the deadline for comments on the above is 9.00 AM on Monday 23rd March 2015.

Regards

David Pickhaver
Senior Strategic Planner,
Strategic Planning and Group,
Spatial Planning
Environment and Place
Torbay Council
Postal address: Electric House, Castle Circus, Torquay, TQ1 3DR

Tel: [REDACTED]
Fax: [REDACTED]
E ma [REDACTED]
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