

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
844154	HB1	Homebuilders Federation
844351 (agent) 844178 (consultee)	HB2	Richmond Torquay (Jersey) Limited (PCL Planning on behalf of)
844351 (agent) 844349 (consultee)	HB3	Waddeton Park Limited (PCL Planning on behalf of).
844316 (agent) 844315 (consultee)	HB4	Taylor Wimpey (Origin 3 on behalf of)
844198 (agent) 791437 (consultee)	HB5	Bloor Homes (South West) Ltd. (Boyer Planning on behalf of).
844863 (agent) 844862 (consultee)	HB6	Abacus (Stride Treglown on behalf of).

844154
TORBAY COUNCIL
PLANNING
RECD 24 MAR 2015
TO electronic copy received 22/3

HBI



Torbay Local Plan
Strategic Planning Team
Spatial Planning
Torbay Council
Electric House (2nd Floor)
Castle Circus
Torquay
TQ1 3DR

SENT BY E-MAIL AND POST

23rd March 2015

Dear Sir / Madam

TORBAY LOCAL PLAN MAIN MODIFICATIONS CONSULTATION

1. Introduction

1.1 Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following representations and appear at any resumed Examination Hearing Sessions to discuss these matters in greater detail.

2. Housing Needs

2.1 It is acknowledged that Main Modification (MM1) to Policy SS1 increases the housing requirement from 8,000 (400 dwellings per annum) to 10,000 (500 dwellings per annum) dwellings over the plan period 2012 – 2032 in line with the Inspector's Interim Findings dated 15 December 2014. Accordingly MM9, MM10 and MM12 increase the housing requirements in the sub-areas of Torquay, Paignton and Brixham. However in Policy SS1 the housing requirement should be expressed as at least 10,000 dwellings.

2.2 Moreover in Paragraph 13 of the Inspector's Interim Findings the Inspector determined that the full objectively assessed needs for Torbay were 5,430 jobs and 12,300 dwellings. In Paragraph 19 the Inspector considers that the prudent approach is to plan for 10,000 dwellings over the twenty year period. Therefore there is an unmet need of 2,300 dwellings over the plan period. It is noted that the current Main Modifications consultation does not

address the unresolved matter of unmet needs which is pivotal to the soundness of the Torbay Local Plan.

3. Land Supply

3.1 **MM1** to **Policy SS1** clarifies that the Council will adopt a Site Allocation DPD if sites are not identified in Neighbourhood Plans or if there is a shortfall in 5 years housing land supply (YHLS) as per the Inspector's Findings. There will also be a 5 yearly review of the plan as specified in **MM7**.

3.2 **MM7** amends **Policy SS12** on 5 YHLS. Instead of an annualised housing requirement of 500 dwellings per annum **Policy SS12** proposes a slightly back loaded trajectory over the plan period of :-

- 450 dwellings per annum between 2012/13 – 2017/18 ;
- 500 dwellings per annum between 2018/19 – 2023/24 ;
- 550 dwellings per annum between 2024/25 – 2031/32.

However the Council should consider the deletion of the reference to the buffer in **MM7** which is confusing and unnecessary.

3.3 It is noted that existing car parks are included in the supply of available sites. It is questionable if this is a reliable source of future land especially given the Major's approach to referendums. What happens if local residents decide the retention of existing car parking facilities is preferable to redevelopment for residential use?

3.4 The Council states that there is sufficient land available for 473 (calculated as 450 + 5% buffer) dwellings per annum from existing commitments comprising of planning permissions and allocations for 343 dwellings per annum plus 130 dwellings per annum from windfalls between 2012 – 2017. However this statement represents a static position. When the 5 YHLS is rolled forward it is not evident whether or not there is a 5 YHLS. Using the trajectory proposed in **MM7** the 5 YHLS for 2015/16 to 2019/20 is calculated as :-

- 450 dwellings per annum x 3 years plus 500 dwellings per annum x 2 years = 2,350 dwellings ;
- average delivery in last 6 years is 360 dwellings per annum so between 2012/13 to 2014/15 shortfall equalled 90 dwellings per annum ;
- 90 dwellings per annum x 3 years is 270 dwellings ;
- 2,350 plus shortfall of 270 is 2,620 dwellings ;
- 5% of 2,620 is 131 dwellings ;
- Total housing requirement for 2015/16 to 2019/20 is 2,620 plus 131 which equals 2,751 dwellings.

On the supply side :-

- 343 dwelling per year from existing commitments x 5 years is 1,715 dwellings ;

- 130 dwellings per year from windfalls x 5 years equals 650 dwellings ;
- 1,715 plus 650 equals 2,365 dwellings ;
- 360 completions per year x 3 years is 1,080 completed dwellings ;
- 2,365 dwellings less 1,080 completed dwellings equals 1,285 dwellings remaining from existing commitments and windfalls.

Therefore there is a gap of 1,466 dwellings between the housing requirement for 2015 – 2020 and the remaining 5 YHLS from 2012 – 2017 which should have been allocated in adopted Neighbourhood Plans meaning proposals under **MM1** for a Site Allocations DPD should be enacted immediately.

3.5 As there is not reasonable certainty that the Council has a 5 YHLS the Local Plan is not sound because it is neither effective nor consistent with national policy as set out in Paragraph 47 of the NPPF. Moreover if the Local Plan is not to be out of date on adoption it is critical that the land supply requirement is achieved as under Paragraph 49 of the NPPF *“relevant policies for the supply of housing will not be considered up to date if the LPA cannot demonstrate a five year supply of deliverable housing sites”*.

4. Neighbourhood Planning

4.1 Neighbourhood Plans must be consistent with the Local Plan therefore if the Neighbourhood Plans do not comply with the timetable set out by the Local Plan nor identify sufficient sites to provide for the housing requirement determined in the Local Plan development sites must be brought forward in Site Allocations DPD (**MM1**).

5. Minor Modifications

5.1 It is noted that modifications to Policy H2 Affordable Housing (**AM129**) are proposed to comply with national policy. For clarity the modification should state that the payment of the commuted sum sought on sites of 6 – 10 dwellings is deferred until the end of the development as set out in the House of Commons Written Statement on Support for Small Scale Developers, Custom and Self-builders dated 28 November 2015.

5.2 The proposed amendment to Paragraph 6.4.1.24 (**AM135**) is concerning. The NPPF (Paragraph 154) is explicit in stating that Supplementary Planning Documents (SPD) should not add to the financial burden of development. The Regulations are equally explicit in limiting the remit of an SPD so that policies dealing with development management cannot be hidden in an SPD.

5.3 At this time it is also noted that Self Build Affordable Housing is not defined in the Glossary of Terms. This omission should be corrected by the Council.

5.4 **AM104** to Paragraph 6.4.2.10 and **AM144** Table 6.1 Dwelling Sizes are incorrect interpretations of the Government's intentions as set out in its response to the Housing Standards Review consultation. The standards referred to by the Council will not become mandatory. If the Council determines to opt into such optional requirements its decision to do so must

be based on evidence and viability assessment. Therefore the Council must evidence and satisfy specific tests on need, viability, affordability and timing as set out in the Government's consultation document which will assess the impact and effect of these policies in the local area. So for example :-

- Need – what is the size and type of dwellings currently being built in the local area to ensure that the impacts of adopting nationally described space standards can be properly assessed in the future? ;
- Viability – what is the impact of potentially larger dwellings on land supply? ;
- Affordability – how will affordability be maintained in the local housing market? ;
- Timing – is there the need for a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost into future land acquisitions?

5.4 AM155 to Policy ES1 – Energy the Council should re-check this policy for compliance with the outcomes of the Housing Standards Review (when known) and other recent consultations such as “*Next Steps to Zero Carbon Homes – Allowable Solutions*” and “*Next Steps to Zero Carbon Homes – Small Sites Exemptions*” dated November 2014.

6. Conclusions

6.1 For the Torbay Local Plan to be found sound under the four tests of soundness as defined by Paragraph 182 of the NPPF, the plan must be positively prepared, justified, effective and compliant with national policy. Unfortunately despite the above mentioned proposed Main and Minor Modifications there remain reservations about the soundness of the Torbay Local Plan in particular unmet needs and lack of 5 YHLS. Therefore the Local Plan has not been positively prepared and properly justified meaning it will be ineffective and non-compliant with the NPPF.

6.2 These conclusions only relate to the current Main and Minor Modifications. The HBF reserves its position on those parts of the Plan not yet examined. In the meantime it is hoped that these representations are of assistance to the Council in informing the next stages of the Torbay Local Plan. If any further information or assistance is required please contact the undersigned.

Yours faithfully
for and on behalf of HBF


Susan E Green MRTPI
Planning Manager – Local Plans

e-mail: 
Mobile 

844351 Agent HBZ

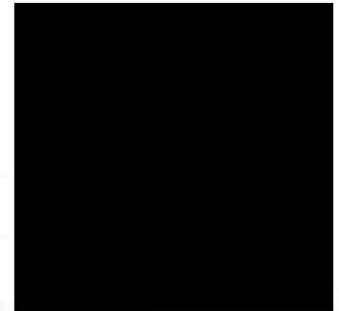
844178
(consultee)



Our Ref DS/PCL/9368
Date 19th March 2015

Spatial Planning
Torbay Council
Electric House (2nd Floor)
Castle Circus
Torquay
TQ1 3DR

TORBAY COUNCIL PLANNING	
REC'D	23 MAR 2015
TO	



Dear Sir/Madam

**EMERGING TORBAY LOCAL PLAN – PROPOSED MAIN MODIFICATIONS
CONSULTATION RESPONSE**

This letter is submitted on behalf of our client, Richmond Torquay (Jersey) Limited, in respect of the current consultation on the Proposed Main Modifications to the Torbay Local Plan (February 2015).

My client's interest is related to Sladnor Park site. The site is an existing residential site in a sustainable location and benefits from an implemented consent for redevelopment. The site can therefore contribute to delivering the future growth requirements set out in the emerging plan.

This letter outlines the key areas of support and objection that my client has in relation to the changes proposed to the submission version of the Torbay Local Plan ("Plan").

In relation to MM1 and the proposed changes to Policy SS1, my client welcomes the removal of a range for the housing target proposed however they maintain (as previously submitted) that the housing figure should be set higher and that the the 10,000 included in the proposed plan should therefore be a minimum.

My client is also supportive of the additional text proposed by MM1 which clarifies the position with regard to reliance on Neighbourhood Plans and the ability for the Council to progress its own site allocations development plan document should Neighbourhood Plans fail to deliver the required levels of housing development.

The proposed changes to Policy SS12 proposed by MM7 are also supported. The proposed additional text and triggers will help ensure that action will be taken by the Council if housing supply is falling behind anticipated levels.

My client is supportive of the identification of Sladnor Park (within MM14) as a site that can contribute to delivery of the housing requirement for Torbay. We are concerned that the indicated number of dwellings achievable at the site is too low. The full opportunities of the site should therefore be explored to ensure that a fuller contribution can be delivered at the site without breaching environmental constraints. We recommend that a master planning exercise is undertaken to achieve this outcome.

We are keen to work with the Council and other parties (including the Torquay Neighbourhood Forum) to ensure that the site is developed to its full potential and ultimately delivered.

If you would like to discuss any element of this letter please contact me.

Kind Regards



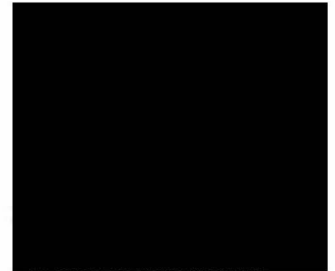
David Seaton, BA (Hons) MRTPI
For PCL Planning Ltd

e: [Redacted]

Our Ref DS/PCL/9368
Date 19th March 2015



Spatial Planning
Torbay Council
Electric House (2nd Floor)
Castle Circus
Torquay
TQ1 3DR



Dear Sir/Madam

**EMERGING TORBAY LOCAL PLAN – PROPOSED MAIN MODIFICATIONS
CONSULTATION RESPONSE**

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The proposed changes to Policy SS12 proposed by MM7 are also supported. The proposed additional text and triggers will help ensure that action will be taken by the Council if housing supply is falling behind anticipated levels.

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We are keen to work with the Council and other parties (including the Torquay Neighbourhood Forum) to ensure that the site is developed to its full potential and ultimately delivered.

If you would like to discuss any element of this letter please contact me.

Kind Regards

A large black rectangular redaction box covering the signature area.

David Seaton, BA (Hons) MRTPI
For PCL Planning Ltd

A black rectangular redaction box covering contact information.

Pickhaver, David

From: Richard Bailey [REDACTED]
Sent: 20 March 2015 14:57
To: Planning, Strategic
Subject: Proposed Modifications to the emerging Torbay Local Plan - Consultation response
Attachments: Torbay Local Plan - Proposed Modifications Consultation - Sladnor Park response - March 2015.pdf

Dear sir /madam

Please find enclosed a response submitted on behalf of our client, Richmond Torquay (Jersey) Limited, in relation to the current consultation on the Proposed Modifications to the emerging Torbay Local Plan.

If you are able to confirm receipt of this email that would be greatly appreciated.

Kind regards

Richard Bailey BA (Hons) Dip TP MRTPI AIEMA
Planning Consultant

PCL PLANNING LTD



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844351 Agent

HB3

844369 Consultant

PCL
PLANNING

PCL Planning Ltd

Our Ref DS/PCL/1446
Date 20th March 2015

TORBAY COUNCIL PLANNING	
RECD	23 MAR 2015
TO	

Spatial Planning
Torbay Council
Electric House (2nd Floor)
Castle Circus
Torquay
TQ1 3DR

Dear Sir/Madam

**EMERGING TORBAY LOCAL PLAN – PROPOSED MODIFICATIONS
CONSULTATION RESPONSE**

This letter is submitted on behalf of our client, Waddeton Park Limited, in respect of the current consultation on the Proposed Modifications to the Torbay Local Plan (February 2015).

This letter outlines the key areas of support and objection that my client has in relation to the changes proposed to the submission version of the Torbay Local Plan ("Plan").

MM1 – Policy SS1 Growth Strategy for a prosperous Torbay

My client welcomes the removal of a range for the housing target proposed however they maintain (as previously submitted) that the housing figure should be set higher and that the 10,000 included in the proposed plan should therefore be a minimum.

My client is also supportive of the additional text proposed by MM1 which clarifies the position with regard to reliance on Neighbourhood Plans and the ability for the Council to progress its own site allocations development plan document should Neighbourhood Plans fail to deliver the required levels of housing development.

MM3 – Policy SS2 Future Growth Areas

My client supports the proposed amendment to Future Growth Area 2 so that it now refers to the Paignton North and West Area including Collaton St Mary. We welcome the identification of these areas and in particular the proposed areas at Collaton St Mary and Brixham Road. My client also wishes to emphasise

their commitment to working with the Council and the community in detailing how the Future Growth Area can be developed.

MM5 – Policy SS11 Housing

My client is supportive of the proposed additional text and table however it should be made clear that the exact level of provision could be lower or higher than the anticipated numbers once detailed proposals are brought forward.

MM7 – Policy SS12 Five Year Supply

The proposed changes to Policy SS12 proposed by MM7 are also supported. The proposed additional text and triggers will help ensure that action will be taken by the Council if housing supply is falling behind anticipated levels.

Proposed additional (minor) modification

My client would like the boundary of the SS2.3/SDP3.4 site to be amended on the proposals map so that it includes an additional parcel of land that was incorrectly omitted by the Council when the site boundary was originally drawn. The enclosed plan indicates the proposed amendment to the plan.

Additionally, Waddeton Park Limited would like to state their commitment to working with the Council and others in bringing forward a comprehensive development proposal for their land interests within these wider sites.

If you would like to discuss any element of this letter please contact me.

Kind Regards

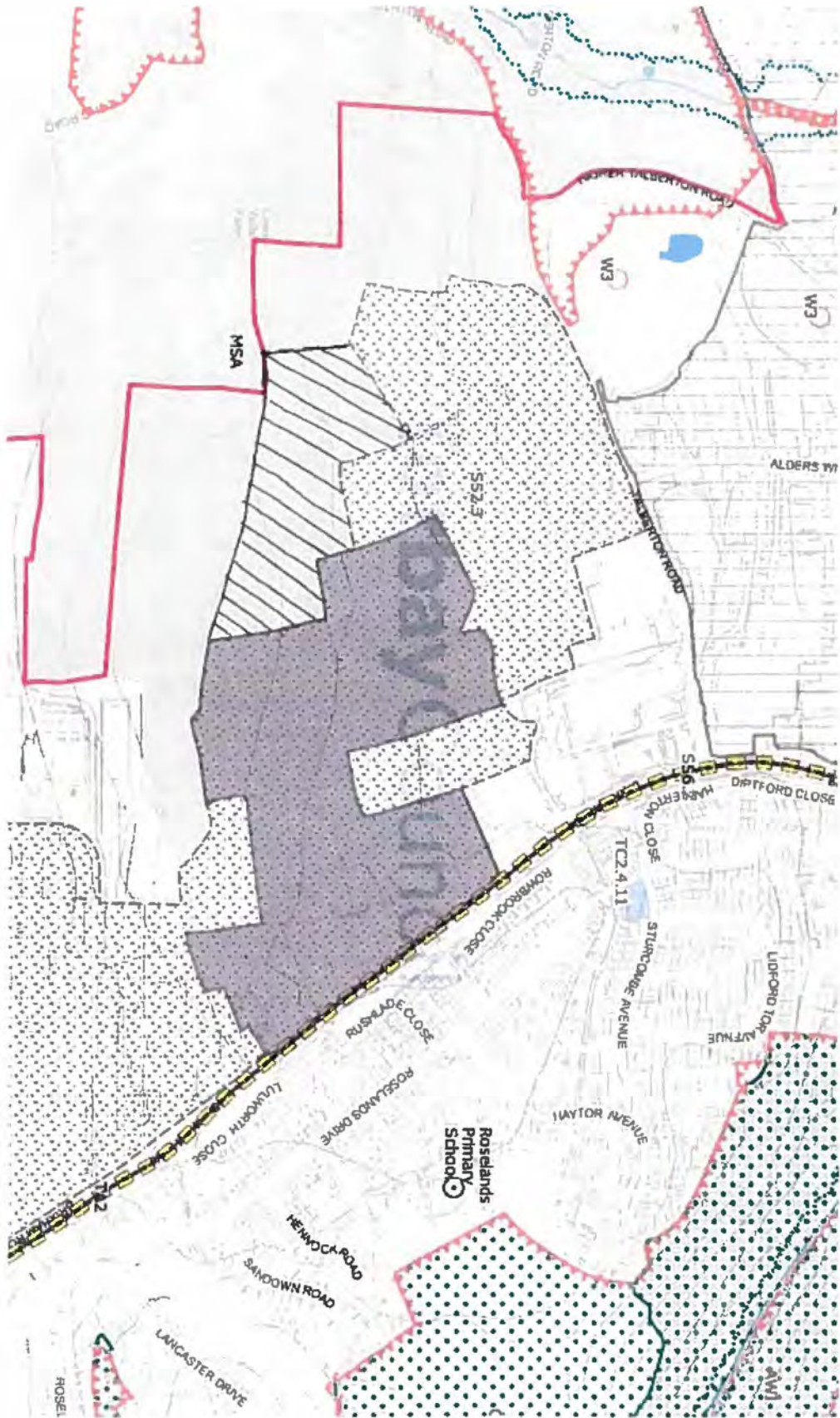


David Seaton, BA (Hons) MRTPI
For PCL Planning Ltd



Enc.s

- Proposed amendment to proposals map



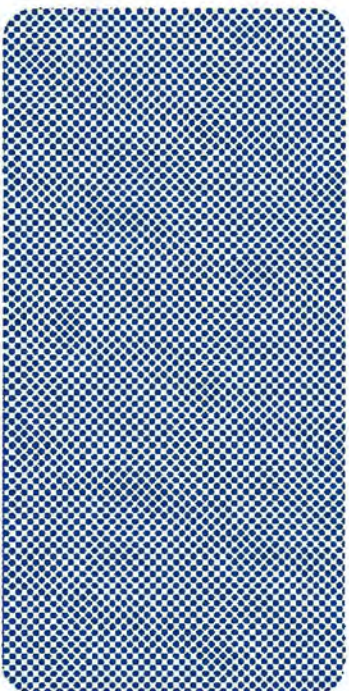


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British Science Week

13 - 22 March 2015

www.britishsocienceweek.org



Pickhaver, David

From: Richard Bailey [REDACTED]
Sent: 20 March 2015 15:37
To: Planning, Strategic
Cc: 'Tim Baker'
Subject: Proposed Modifications to the emerging Torbay Local Plan - Consultation response
Attachments: Torbay Local Plan - Proposed Mods Consultation - WP Ltd response - March 2015.pdf;
Proposed amendment to Proposals Map.pdf

Dear Sir / Madam

Please find enclosed a response submitted on behalf of our client, Waddeton Park Limited, in relation to the current consultation on the Proposed Modifications to the emerging Torbay Local Plan.

If you could are able to confirm receipt of this email that would be greatly appreciated.

Kind regards
Richard

Richard Bailey BA (Hons) Dip TP MRTPI AIEMA
Planning Consultant

PCL PLANNING LTD



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Origin3 Ref – 12-024

Spatial Planning
Torbay Council
Electric House (2nd Floor)
Torquay
TQ1 3DR

17th March 2015

Dear Sir

Representations to Torbay Council Local Plan Main Modifications (February 2015)

These representations are made on behalf of Taylor Wimpey Exeter in respect of their interest at land adjacent to A385 Totnes Rd, Collaton St Mary. These representations follow representations made in April 2014 and the appearance at the Examination Hearings in November 2014.

Main Modification 5: SS11 Housing

The continued inclusion of SDP3 in the Paignton North and Western Area within Table 4.3 which identifies source and timing of new homes necessary to achieve the revised 10,000 dwelling trajectory is welcomed. However, it is disappointing to note that the number of dwellings identified for SDP3 has reduced as a response to the masterplanning exercise for Collaton St Mary that was undertaken by Stride Treglown on behalf of Torbay Council. The Stride Treglown draft masterplan was consulted upon on 2 occasions in 2014, with the last being November 2014 (at the same time as the Examination Hearings were taking place). Representations to this masterplan have been previously provided and are attached for reference as the majority of the comments still remain relevant to the Main Modification SS11 because they underpin the spatial strategy. Subsequent to the last consultation on the masterplan, there has been no further dialogue from Torbay Council or Stride Treglown in the form of a consultation summary and it seems that the number of dwellings identified through this exercise has been carried forward into the Local Plan figures without full justification as to the reasons behind this.

The evidence base being used to derive the spatial distribution in this part of the plan area is therefore flawed and not capable of justifying modification SS11 in this regard.

The main concerns with regard to the Council's reliance on this work is summarised as follows and is set out more fully in the original representations to Collaton St Mary Draft Masterplan.

- In the case of our client's site, evidence shows that the landscape could support development of a wider area.
- The masterplan approach is flawed by placing public open space in the wrong part of the site and with a more considered arrangement; better use of the site could be achieved.
- The detailed layout of the site implies a fixed solution upon which the Main Modifications have been based. Again, a different approach to the masterplan would achieve better use of the site.
- The density of the masterplan is too low at 20dph. This part of the plan area could accommodate additional housing on the basis of a sensible density being used in the evidence base alone.

As a result of the concerns surrounding the masterplan, it is not sufficient to justify the spatial distribution being advanced in the main modifications. Moreover, it was apparent at the examination that other locations which have now been chosen to accommodate more growth are in fact more sensitive, attracting outright objections from Natural England and others, whereas Taylor Wimpey's land at Collaton St Mary did not suffer the same concerns having been fully tested through an earlier application process. It therefore seems illogical to focus development in the most ecologically sensitive parts of the plan area and contrary to creating a justified plan.

In addition there now seems to be an inconsistency between what the masterplan and main modifications seek to achieve and what is viably deliverable in practice. The significant reduction in housing provision for Collaton St Mary will considerably affect the delivery of any new local services, facilities, highway or other improvements. There is now insufficient critical mass of development.

Main Modification 10: SDP1 & SPD2

The comments made in relation to Main Modification 5 above also stand for Main Modification 10 which identifies a reduction in development at SDP3 Paignton North and Western Area following the masterplanning exercise.

It is noted that the shortfall in dwelling numbers in the SDP3 area has been made up by inclusion of 180 dwellings across various car park sites within Paignton Town Centre and Sea Front. Whilst these 5 car parks have been considered as 'unconstrained' via the SHLAA process, the ability to develop these sites is still subject to sufficient car parking being retained elsewhere in the Town Centre; this is

a significant unknown quantum and on that basis development cannot be considered as available in NPPF terms because of this reliance. The overreliance on land that has yet to be justified for development could present a delivery issues if it becomes apparent that sufficient car parking is not available in the town centre and as a consequence these sites cannot be released for development. Instead the Council are choosing to omit land which already has developer interest with technical issues resolved and which could come forward much sooner to meet the required need. The approach is not therefore justified and the most appropriate.

Main Modification 11: Table 5.12 SDP3: Paignton Northern & Western Area

The trajectory set out for development within SDP3.3 Totes Road, heavily weights delivery in this area to the back of the plan period and does not reflect the additional text included as part of MM2 in that where there is currently active developer interest in sites at Collaton St Mary, Yallberton and White Rock, Paignton the plan will support early delivery on sites where infrastructure, environmental and other relevant planning matters are satisfactorily addressed. With reference to land at A385 Totes Road, there is a large amount of technical work that is currently available for this site – as prepared for a detailed application in 2012 and the site is self-contained with regards infrastructure requirements, presenting no constraints by way of access, contamination or third party land issues. Taylor Wimpey are a well-regarded national house-builder committed to the early delivery of this site and therefore it is envisaged that this site could indeed come forward far sooner in the plan period to meet a more immediate need and could deliver dwellings within the initial 5 year period.

Main Modification 12: Table 5.14 SDB1 Source of Housing within Brixham Peninsula

It is noted that whilst there is a significant fall in housing numbers in SDP3.3, there is an increase in delivery from SDB Brixham Peninsula, with additional land at Wall Park and the inclusion of land South of White Rock.

This matter was debated at the examination and whilst it is not clear whether the LPA has reached agreement with Natural England with regards to the effects of more development in these locations, it surely cannot be considered the most sustainable option when there are alternative sites that could reasonably accommodate more growth than is currently identified through a flawed masterplanning exercise. Reconsideration should be given to redressing the balance back in favour of areas like Collaton St Mary where environmental constrains are less.

Again, the choice of location and level of distribution is not justified by a balanced reasoning of the requirement in NPPF to achieve sustainable development (Para 14, NPPF).

I trust that this letter is self-explanatory, but should you wish to discuss the content further, please do not hesitate to contact me.

Yours sincerely



Katie Peters
Associate



cc. **Andrew Tildesley – Taylor Wimpey, Exeter**

Origin3 Ref – 12-024

Mr David Pickhaver
Spatial Planning
Torbay Council
Electric House (2nd Floor)
Torquay
TQ1 3DR

25th November 2014

Dear David

Response in respect of the Draft Collaton St Mary Masterplan (October 2014)

This response is provided on behalf of Taylor Wimpey Exeter in respect of their interest at land adjacent to A385 Totnes Rd, Collaton St Mary. These representations follow our earlier response in June 2014 in respect of the Concept Masterplan. Our comments largely relate to Chapter 5 of this document with particular reference to the proposals for 'Phase 4' set out on pages 36 and 37.

Principle of Development

We welcome and support the principle of development north of Totnes Road within the draft Masterplan as this represents a sustainable and logical extension to the settlement. The delivery of housing on this site will assist Torbay Council in meeting the objectively assessed need for housing in the authority and contributing towards the 836 dwellings that are required in the Totnes Rd area (SPD3.3) as per Table 5.12 of Submitted Torbay Local Plan (2014). A great deal of technical work has been undertaken with respect of this site and clearly demonstrates the ability to utilise the site for residential development providing mitigation where necessary to reduce any impact.

However, the Draft Masterplan identifies less half of the land under Taylor Wimpey's control for development and indeed as a whole only provides for 460 new homes which falls significantly short of the identified requirement of 836 homes. As such, the Draft Masterplan does not enable Torbay to fulfil the requirements set out within the Submission Version of the Local Plan. This shortfall will put pressure on other sites that are considered less sustainable in order to enable Torbay to demonstrate an adequate housing land supply going forward.

Extent of Development

The indicative masterplan for the land adjacent to Totnes Road (also known as the Car Boot Sale land) shows development on less than half of the total land under Taylor Wimpey's control and which is available for development. Whilst we note the detail supplied in relation to the landscape appraisal of Collaton St Mary undertaken as part of this process, Taylor Wimpey have also commissioned a landscape assessment of the site to be undertaken as part of the revision of the scheme. This additional assessment work concludes that it would be possible to extend the western boundary and move the built form west whilst still avoiding the most visible slopes at the far western edge of the site. The 60m contour which has been used to inform the extent of development only forms part of the evidence base. More advanced technical studies should be taken into account with detailed mapping being used to establish the extent of development. The use 60m contour line as a reference point is premature and the prescribed boundary does not benefit from a full 3-dimensional study into visual impact, a tool which could also be used to design green infrastructure which creates a link to the wider landscape setting. More flexibility on this boundary could be offered to allow this site, which is readily deliverable, to come forward in a sensitive manner which responds to the sensitivities of the western side to fulfil a demonstrable need in Paignton.

Taylor Wimpey are in support of the general strategy noted on Page 28 in relation to reinforcing hedgerows and strategic planting of native shrubs and trees which will enhance the sites ecological value and limit landscape impact where possible. However we would query whether this strategic planting has been taken into consideration when assessing the extent of development on the western boundary and whether buffer / mitigation planting could be a means of limiting impact and allowing the site to be more efficiently used.

In addition, we have noted that there would appear to be a disconnect between the landscape assessment and the form of the development shown. The masterplan is described as being 'primarily influenced by the characteristics of the surrounding landscape' (page 24) and if this is so, it is illogical for the public open space to be located on the lower slopes, which are the most discreet part of the site. At present, the urban form is, to a certain extent, detached from the village and therefore we would therefore suggest that the urban form be extended southwards in the lower parts of the site to improve the connectivity to the existing settlement.

Form of Development

As a more general point, Taylor Wimpey wish to raise some concern over the level of detail that has been presented with respect of the individual sites. At this stage, this level is overly prescriptive and looks to set a precedent on this site without consideration of other technical matters such as highways, drainage and ecology which could inform a layout in the future. Identification of a proposed form of development through this exercise (which implies a fixed solution) will not provide developers with the

flexibility they need to design a site efficiently that responds to known constraints and opportunities. To this end we would suggest that these diagrams are replaced with higher level indicative plan which sets out a number of site specific design objectives and principles which can in the future form the basis of a more detailed masterplan which takes into account these principles alongside additional technical information.

Moving onto the proposals for the land adjacent to Totnes Road themselves, as previously noted, the location of the public open space will result in the development, to a certain extent, being detached from the village. We note that one of the objectives for the site (and indeed the development of Collaton St Mary as a whole) is to create a gateway and a sense of arrival to Torbay (page 13). To this end, it would seem more sensible to develop the lower slopes in a comprehensive manner for housing which can complement the development on the opposite side of the road. The provision of allotments in this location would not provide an appropriate gateway into Collaton St Mary and Torbay.

Whilst Taylor Wimpey are supportive of the provision of a Community Orchard in Collaton St Mary, the proposed location on the eastern boundary does not allow to site to be utilised efficiently based on its constraints. An orchard use would have far less of an impact on landscape and views and to this end would be more appropriately located on the more sensitive slopes of the site, with suitable access provided through the development.

The draft masterplan for the land adjacent to Totnes Road is heavily dominated by the estate road which is both inefficient in development terms as well and being less attractive on a part of the site which is identified as being potentially more sensitive. Again, we would suggest that this is too much detail for this stage and that a set of design principles for an access road / estate road could be established which would inform design at a later date.

Density

Proposed densities for new development should match local existing densities to ensure creation of a responsive environment and a development that is appropriate to its context. The level of 20 dwellings per hectare that is proposed is not reflective of existing densities in Collaton St Mary and represents an inefficient solution to development of a site. To this end we would recommend an increased proposed density of 30-35 dwellings per hectare which will be more reflective of the surrounding area and whilst taking account of constraints, will provide an efficient development which assists further in meeting Torbay's housing needs. Taking into account existing landscape and ecological constraints whilst reflecting and complementing surrounding development it is envisaged that the land adjacent to A385 Totnes Road could deliver in the region of 100 new homes.

Access / Highways

The proposals shown in the draft masterplan identify an access to the land adjacent to Totnes Road from a new link road which will go on to provide a connection to the School and the Church punching through the hedgerow on the eastern boundary. An access solution has previously been agreed for this site without a need to continue on through to the School and Church. Whilst we understand the issues that are currently experienced in this part of Collaton St Mary it is still important to consider the impact that Greater Horseshoe Bats have been recorded along this hedgerow during the extensive bat surveys undertaken for the proposed Taylor Wimpey site; the original proposal allowed for a 10m development-free buffer along the southern side of the hedgerow as part of the mitigation for potential impacts on Greater Horseshoe Bats, this was welcomed and accepted as a design solution by Natural England and the Torbay Council Ecologist. We note that the proposals set out that lighting and potential planting could reduce the impact of breaking through this hedgerow but there will still be an impact and it is our opinion that the proposed new link road through this hedgerow could have a likely significant effect on the South Hams SAC and due consideration of alternative options for this road should be undertaken. We would wish to see Natural England's views on the impacts of this road before a commitment was made to its delivery.

Furthermore, we believe that the pressures currently experienced in this part of Collaton St Mary could be mitigated against by increasing housing provision in this immediate area thus changing the demographic of the school intake from a wider area to a small area, encouraging walking to school and reducing the need to travel by car. Planning for an increase in car use is not sustainable.

Delivery

Taylor Wimpey support the reference made at page 36 regarding the ability of the land adjacent to Totnes Road to act as a standalone site which could come forward sooner than the prescribed 'Phase 4' should the need or desire to develop the area arise sooner. We would wish to see this reinforced further through this document rather than the continued reference to Phase 4. Perhaps those sites that could come forward sooner should be dealt with earlier in the document.

Given the amount of technical work that is currently available for this site – as prepared for a detailed application in 2012 and the site is self-contained with regards infrastructure requirements, presenting no constraints by way of access, contamination or third party land issues. Taylor Wimpey are a well-regarded national housebuilder committed to the early delivery of this site and therefore it is envisaged that this site could indeed come forward far sooner in the plan period to meet a more immediate need. Taylor Wimpey are at the stage of commencing pre-application discussions with Torbay Council in relation to bringing this site forward to an application in early 2015.

We note that the new village centre and potential school expansion are identified as possible first phases for development in Collaton St Mary, aspirations which early delivery of housing will enable and facilitate more readily as well as ensuring their ongoing attraction, sustainability and success.

I trust that this provides you with a clear understanding of the matters that Taylor Wimpey would wish to be considered in further iterations of the masterplan. We would be pleased to discuss these points further with you to assist in your review,

Yours sincerely



Katie Peters
Associate



cc. **Andrew Tildesley – Taylor Wimpey, Exeter**

844198 agent HBS
791437 consultant

Pickhaver, David

From: Elliot Jones [REDACTED]
Sent: 20 March 2015 08:45
To: Planning, Strategic
Cc: Pickhaver, David
Subject: Torbay Local Plan: Representations to Proposed Main Modifications
Attachments: 190319 Representations to Main Modifications Torbay Local Plan.pdf

Dear Sirs,

Please find enclosed representation forms and attached representations to the Torbay Local Plan – Proposed Main Modifications (February 2015).

These representations are submitted on behalf of our client, Bloor Homes (South West) Limited.

I would be grateful if you could acknowledge receipt of this email and attachments in order that these representations have been recognised as being duly made.

Please contact me if you have any queries.

Kind regards,

Elliot Jones
Director

Boyer 1B Oak Tree Ct, Mulberry Dr, Cardiff Gate Business Pk, Cardiff, CF23 8RS.

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Representations

Proposed Modifications to the Torbay Local Plan (2012 - 2032)



Boyer

Report Control

Project: Land to the North of Totnes Road, Paignton
Client: Bloor Homes (South West) Limited
Job Number: 12.811
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Primary author: Laura Harry
Initialed: LH
Review by: Elliot Jones
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1. Introduction

- 1.1 These representations on the Proposed Main Modifications to Torbay Local Plan (2012-2032) have been prepared by Boyer on behalf of Bloor Homes (South West) Limited in respect of their interest at Land to the north of Totnes Road, Collaton St Mary.
- 1.2 The representations relate principally to the:
 - Increase in overall housing numbers to 10,000 dwellings between 2012-32;
 - Plan supporting early delivery in the Future Growth Areas subject to relevant planning matters being addressed;
 - Allocation of a new Future Growth Area on Land to the South of White Rock;
 - Development of Site Allocation DPDs if Neighbourhood Plans are not submitted timely or if there is a danger of five year supply not being maintained; and
 - Identification of additional potential housing sites for consideration through Neighbourhood Plans.
- 1.3 The above matters are now addressed with reference to the specific modification.

2. Main Modification MM1 (Policy SS1)

- 2.1 Policy SS1 sets out the growth strategy for Torbay. It focuses on the area's economic performance and proposed level of growth during the Plan period. In terms of housing, it divides the Plan period into three sources of growth. The first relates to existing commitments, the second considers identified sites and the third outlines the intended growth through Strategic Delivery Areas.
- 2.2 Bloor Homes are generally supportive of Policy SS1. The Policy has been modified to seek the delivery of 10,000 new homes (with a delivery rate of 500 dwellings per annum) rather than 8,000 new homes (at a delivery rate of 400 homes per annum) over the 20 year Plan period, which accords with the Inspector's Interim Findings. The introduction of an increased housing figure into the Plan reflects the Council's economic growth strategy and the Government's aim of boosting the supply of housing.
- 2.3 However, it is noted it was agreed during the Examination that the full objectively assessed needs for Torbay were 5,430 jobs and 12,300 dwellings. This means that there is an unmet need of 2,300 dwellings over the plan period, which is not addressed by the Torbay Local Plan in its current format raising questions about its soundness.
- 2.4 Notwithstanding this, each separate section of the policy is now considered in turn.

Existing Commitments

- 2.5 Policy SS1 states that in the first five years of the plan, housing growth will be sourced from land that already has planning permission or is allocated for residential development (committed sites) and from windfall sites. This will support the anticipated delivery of 1,250 – 1,500 new jobs and for around 2,365 new homes (equal to 450 dwellings per year plus 5%).
- 2.6 There appears, however, to be a discourse between the proposed housing delivery figure of 500 units per annum and the current anticipated delivery rate for the first 5 years of the Plan of 473 units per annum. While it is accepted that this period (2012-17) encompasses housing completions within an era of low delivery, it is imperative that the Council aims to address the deficit as soon as feasibly possible. In this regard, the Council should actively engage with developers to bring forward allocated sites such as Land North of Totnes Road in order to quickly and effectively meet any shortfall.
- 2.7 It is also noted within the first five years that there is reliance on a high level of windfalls. NPPF Paragraph 48 states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends.

- 2.8 While it is acknowledged that there is evidence in the Torbay SHLAA 2013 that suggests there have been high historic rates of windfall development within Torbay, there is limited information to justify that this will continue through the Plan period.
- 2.9 This is an erroneous assumption to make; it does not take into account that the supply of such sites is finite (particularly as it does not take into account greenfield sites) and that there will be a reduction in these sites during the Plan period. Given that there is a lack of robust evidence, this assumption should not be relied upon.
- 2.10 Simply, rolling forward previous delivery rates, in our view, does not meet the last requirement in Paragraph 48 of the NPPF in that any allowance should have regard to expected future trends. Therefore, it is our opinion that the level of windfall development to be provided should be lowered.
- 2.11 We also note the Council's reliance on a number of car parks coming forward for residential development. All of these car parks are constrained; for instance they are all within flood risk areas and are therefore reliant on significant investment in flood defence / resilience infrastructure. The delivery of all these car parks is also unlikely given the need to ensure that sufficient car parking is still available to meet the needs of the town. The impact of their development on the vitality and viability of town centres must be taken into account, whilst there is also the prospect that the development of such sites could be subject of a local resident's referendum that could prevent development. This matter is considered in more detail at Main Modification MM12.
- 2.12 In addition, Churston Golf Club is being relied upon by the Council as a committed development site. A proposal linked to the residential development of this site was recently dismissed on appeal (Appeal Ref: APP/X1165/A/13/2205208). The site is now considered to have no potential for housing development. On this basis, the site should be deleted rather than being moved back in the Plan period.
- 2.13 The reliance on windfall sites, car parks and Churston Golf Club to meet housing needs in Torbay will have implications in relation to the amount of housing that will come forward during the first five years of the Plan period. This means that alternative sources need to be considered to meet the requirements during the early part of the Plan period. This point is considered in more detail in the following section of this representation.

Identified sites

- 2.14 As set out above, we have raised issue with the level of provision during the first five years of the Plan. In years 6-10 of the Plan period, development is expected to come forward from the completion of committed and developable sites identified in Neighbourhood Plans.
- 2.15 Previous versions of the Local Plan placed emphasis on these sites coming forward via Neighbourhood Plans. We raised our concerns about this approach in our representations to the Submission Draft; as such an approach would give rise to potential delays to critical development coming forward. We therefore support the modifications to the Policy which would ensure that if Neighbourhood Plans do not identify sufficient sites to provide the housing

requirement of the Local Plan, the Council would bring forward sites through Site Allocation Development Plan Documents (DPDs). Furthermore, if it appears that there will be a shortfall in the five year supply of deliverable sites the Council would bring forward additional sites.

- 2.16 As set out in the Inspector's Initial findings, there needs to be a definitive time period for when the Site Allocations DPD is enacted. Given the time required for preparing such documents, it is suggested that if Neighbourhood Plans have not sufficiently progressed then the Site Allocations DPD should be started by Autumn 2015 to ensure they are in place for start of 2017 and years 6-10 of the Plan. This will be 'internally' consistent with other suggested changes under the Main Modifications.

Strategic Delivery Areas

- 2.17 Development in Strategic Delivery Areas (SDAs) will be set out in detail via masterplanning, concept plans and/or in Neighbourhood Plans. Future Growth Areas are located within these SDAs. Policy SS1 states that there will be some initial delivery of development in Future Growth Areas, within the first 10 years, if required to meet demand for new employment space and homes.
- 2.18 To support housing delivery, further allowance or weight should be given to bringing forward sites within the Strategic Delivery Areas during the early part of the Plan period, that is, sites that are identified in the Local Plan. There should be an emphasis on bringing these sites forward where there is no impediment to their delivery. Although the Plan recognises that there will be some initial delivery (Paragraph 4.1.25 – Modification MM2) within Future Growth Areas, this does not provide sufficient backing or weight to a source of development that would underpin the growth agenda in the first ten years of the Plan.

Summary

- 2.19 We welcome the increase in overall housing numbers to 10,000 dwellings over the Plan period 2012-32 and the requirement for Site Allocation Development DPDs to be produced if Neighbourhood Plans do not identify sufficient homes to provide the housing requirement of the Local Plan, or if it appears that a shortfall in five year deliverable sites is likely to arise.
- 2.20 Notwithstanding the above, we are concerned that there remains an unmet need of 2,300 dwellings over the plan period based on the full objectively assessed needs and there is an over-reliance on windfall sites, car parks and Churston Golf Club to meet housing needs in Torbay. We are sure that this will have implications in relation to the amount of housing that will come forward during the Plan period. This means that alternative sources need to be considered to meet the requirements during the Plan period.

3. Main Modification MM2 (Paragraph 4.1.25)

- 3.1 The text at Paragraph 4.1.25 has been modified to state that while development in Future Growth Areas is anticipated to rise towards the latter part of the Plan period, it is noted that there is active developer interest in some sites such as Collaton St Mary, Yalberton and White Rock. The text states that the Plan will support early delivery where infrastructure, environmental and other relevant planning matters are satisfactorily addressed. We support the Council's recognition that Collaton St Mary could be delivered at an earlier stage of the Plan period.
- 3.2 Paragraph 4.1.25 also states that where there appears to be a risk of a shortfall of deliverable sites against the Local Plan rolling five year requirement, or overall housing trajectory, the Council will bring forward additional sites through Site Allocation DPDs. However, a firm timetable will be required for when Site Allocation DPDs are invoked to reduce delay and ensure that the Council meet their housing targets set out within the Plan. Accordingly, the revised paragraph should include an explicit timeframe similar to that set out in Main Modification MM8. This is to ensure internal consistency.
- 3.3 Thus, we support the modifications to Paragraph 4.1.25, which allow early delivery of Future Growth Areas including Collaton St Mary where relevant matters are satisfactorily addressed, and enable the Council to bring forward additional sites through Site Allocation DPDs in certain circumstances. However, this needs to be set to a definitive timetable.

4. Main Modification MM3 (Policy SS2)

- 4.1 We object to the requirement to provide a Greater Horseshoe Bat (GHB) mitigation plan for all development within Future Growth Areas. A mitigation plan should not be a strategic policy requirement; a more general policy relating to this matter and wider ecological issues should be included within Development Management Policies of the Plan. Whether or not a GHB mitigation plan is required should be considered on a site by site basis after the completion of a Phase 1 Habitat survey. If GHB are present on or near the application site, a mitigation plan should then be produced.

5. Main Modification MM4-MM6 (Policy SS11)

- 5.1 We generally support the increase in housing numbers to 10,000 dwellings over the Plan period 2012-32.
- 5.2 The modification to housing numbers accords with the Inspector's 'Initial Findings' from the Local Plan Examination, where the Inspector considered that the prudent approach for the Plan is for 10,000 dwellings over the 20 year Plan period. However, there remains an unmet need for 2,300 dwellings over the plan period based on the full objectively assessed needs which still needs to be addressed.

6. Main Modification MM7 (Policy SS12)

- 6.1 Policy SS12 states that the Council will maintain a rolling 5 year supply of specific deliverable sites to meet a housing trajectory of 10,000 dwellings over the Plan period.
- 6.2 In terms of the level of housing to be provided during the first five years, we have already made comments about the overall provision for housing in the Local Plan (see representation Main Modification MM2) suffice to say Bloor Homes have concerns that the proposed sources of housing will not meet the identified delivery rates during the early Plan period. This would result in a shortfall in the first five years. As stated in the NPPF (Paragraph 47) and PPG (Paragraph: 030 Reference ID: 3-030-20140306), it is a requirement for Councils to meet any identified shortfall within the first five years of the Plan period.
- 6.3 As demonstrated in the representations submitted by the HBF, it would seem that there is likely to be a deficit in supply during the first five years. Accordingly, we consider that there should be more emphasis placed on sites from later stages of the Plan, such as Collaton St Mary, being able to support immediate five year land supply and that such sites should be brought forward for development earlier in the Plan period. This is based on the following factors:
- There has been an under provision of housing sites in recent years;
 - There is presently insufficient assessed supply to meet objectively assessed need (as set out in the Local Plan evidence base and in our client's evidence to the Churston Golf Course Appeal);
 - There is an over-reliance on windfall sites (without compelling evidence to support the view that future trends will follow historic patterns);
 - The potential for referendum to be held on development sites under the ownership of the Council;
 - There is reliance on Churston Golf Club which is unlikely to be developed; and
 - There is over-reliance on car parking sites coming forward as a result of constrained sites and the need to retain sufficient car parking to meet the needs of the town.
- 6.4 In this regard, the acknowledgement is welcomed that sites currently identified for the latter part of the plan, can be brought forward, and exceed the five year supply figure where they can bring social, regeneration and infrastructure benefits. However, more emphasis should be placed within the policy on how sites within Future Growth Areas can contribute to five-year housing land supply.
- 6.5 Therefore, we support sites being brought forward from later stages of the Plan via the Site Allocation DPDs or where the five year supply of deliverable sites falls short of meeting the proposed housing trajectory. We also welcome an early review of the Local Plan's housing trajectory where there is evidence that the provision of housing will not keep pace with the need to provide for economic growth. However, there should be explicit reference in policy that sites within the Future Growth Areas can be brought forward where infrastructure, environmental and other relevant planning matters are satisfactorily addressed.

7. Main Modification MM8 (Paragraph 4.5.40)

- 7.1 We are generally supportive of the text contained in Paragraph 4.5.40 which states that if Neighbourhood Plans are not submitted to the Council in a form that is in general conformity with the Local Plan by October 2015, the Council will commence production of Site Allocation DPDs, in order to produce and adopt any that may be required.
- 7.2 A firm timetable will be required for when Site Allocation DPDs are invoked to reduce delay and ensure that the Council meets their housing targets set out within the Plan.

8. Main Modification (Policy SDP1 and SDP3)

- 8.1 We raise an objection to the reduction in housing numbers at Totnes Road (SDP3.3) from 836 dwellings to 460 dwellings as a result of masterplanning. This is a significant reduction of 376 dwellings, roughly half the provision, within this Future Growth Area.
- 8.2 In Main Modifications MM10 and MM11 there appears to be limited explanation as to how and why the lower 460 figure has been arrived at; there is neither justification nor commentary relative to the masterplan on why it differs from the housing requirements set out in the Proposed Submission Draft. This approach is clearly not in accordance with Paragraph 158 of the NPPF which requires each local planning authority to ensure that the Local Plan is based on up-to-date and relevant evidence and that full account is taken of market and economic signals.
- 8.3 The difficulties arising from the masterplan's current approach is highlighted by the Council's changing position at Collaton St Mary. In the 2013 SHLAA, the site was assessed as only being able to contribute 30 dwellings in the latter part of the Local Plan (2023-2032). However, in the draft masterplan, the indicative layout showed a scheme of approximately 70 units. Subsequently, a Council paper, submitted to the Local Plan Examination, setting out potential housing locations if the New Local Plan housing land supply requirements are increased, indicated that a further 50 units could be accommodated on this site. Therefore, within the space of one year, the site capacity has increased from 30-120 units. This demonstrates the difficulty that the Council has in trying to reconcile the draft masterplan with wider housing policy considerations.
- 8.4 In addition, Bloor Homes' consultants have examined Collaton St Mary in much greater detail than the draft masterplan, which was based on desktop appraisals. Bloor Homes have undertaken a landscape led strategy that has shown there will be no adverse impact on landscape, highways, ecology, drainage or arboriculture. On this basis, it is their view that 160 units can be accommodated on site. If 160 dwellings cannot be achieved, the proposed development of the site is unlikely to be commercially feasible given the anticipated high development costs associated with the site relative to its topography and location. In addition, Bloor Homes are looking to provide high levels of green infrastructure as part of the scheme and again if the site does not come forward, this will not be realised.
- 8.5 The site's capacity is an important issue on a number of levels.
- 8.6 First, as the Inspector noted in his Initial Findings, he considered that a figure of 12,300 dwellings represented the most reliable figure for full objectively assessed need in the area. Accordingly, there is a presumption that the Council should seek to maximise the capacity of all allocated sites to meet the accepted full objectively assessed need in the area. Clearly, the Council's current approach to Policy SDP3.3 does not achieve this requirement. The work undertaken by Bloor Homes' consultants has shown that the site can accommodate higher numbers than that indicated by the Council.

- 8.7 Secondly, the Council's current approach is predicated on the basis of the masterplan findings. However, this is fundamentally flawed. The study was predominantly a desk based analysis, which utilised existing sources of evidence but did not undertake any site specific analysis. Accordingly, it can only – at best – provide an indicative analysis of site capacity. This is not a sufficient basis for policy formulation. As stated, Bloor Homes has undertaken exhaustive capacity studies, which have indicated that the site could accommodate approximately 160 units and it is this figure that should be set out in Policy SDP3.3.
- 8.8 For the reasons outlined above, we object to the significant reduction of housing numbers at Totnes Road from 836 dwellings to 460 dwellings as a result of masterplanning process, which is neither a reliable nor accurate evidence base. Instead, the Council need to recognise that the site can accommodate approximately 160 units with no adverse impacts on landscape, highways, ecology, drainage or arboriculture. Increasing the housing numbers at Collaton St Mary will help to ensure that the Council meet their full objectively assessed needs.

9. Main Modification MM12 (Policy SDB1)

- 9.1 We raise an objection to the identification and allocation of Land South of White Rock for 460 dwellings. Critically, this site was an 'excluded site' which did not feature in the Proposed Submission Draft of the Local Plan due to significant environmental constraints and issues relating to delivery.
- 9.2 Development of the site would involve result in the loss of large areas of Grade 1, 2 and 3a agricultural land (excellent, very good and good). The whole area is within cirl bunting 2km foraging / feeding zone and the south west part of the site is also within a 250m buffer zone. In addition, it is within a GHB sustenance zone.
- 9.3 The site is also highly sensitive to change. Most of the site is open to views from South Devon AONB to the west and south. The site is not within a flood risk area; however Galampton Watercourse (main river) is adjacent to the southern edge of the site. The sensitivity of the site means that it would be difficult to deliver new homes.
- 9.4 The site was considered as part of a call-in appeal in 1997 by the Secretary of State (SoS) (P/1995/1304: SW/P/5183/220/4), but was rejected by the Inspector (and SoS) because of concerns about impact on views from the AONB, albeit in the context of employment (Class B1) buildings.
- 9.5 The 2013 SHLAA considered the site suitable for the development of 350 dwellings, which is far less than the 460 new dwellings in the Proposed Modifications. It is considered that this site was only introduced into the new Local Plan because the Inspector considered that more land was required for housing. While this is understood, it is Bloor Homes' view that the capacity on sites already allocated should have been considered in the first instance. Given our objections to Main Modification MM10 and MM11, sites such as Land North of Totnes Road should be reviewed and assessed on the basis of robust supporting evidence such as site survey work before new allocations are made.
- 9.6 In light of previous concerns raised about Land South of White Rock, the Council's proposal to allocate the site over and above the estimated SHLAA site capacity would appear to be incorrect and not grounded on a sound planning rationale, particularly given that other previously allocated sites are not being utilised to their full capacity.

10. Modification MM14 (Appendix D)

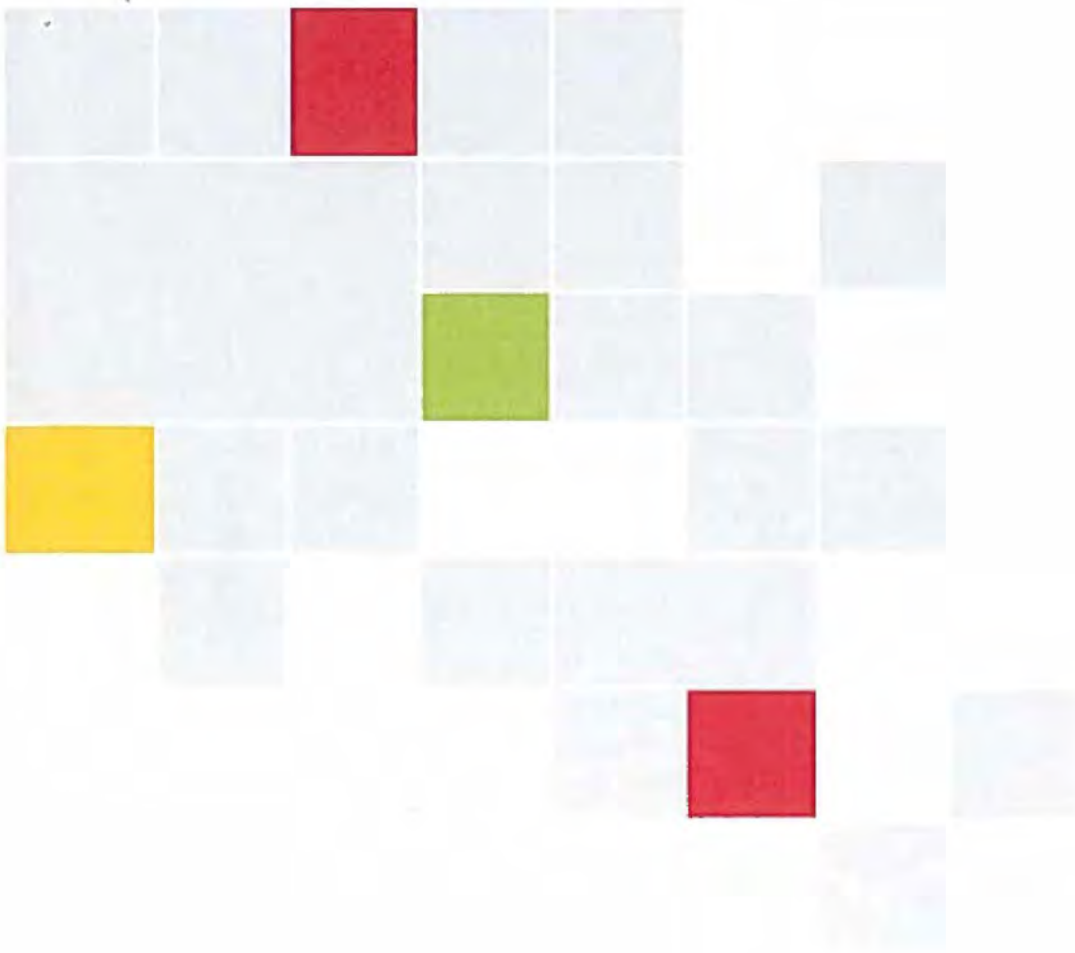
- 10.1 Appendix D sets out the Council's Five Year supply of deliverable sites in Torquay, Paignton and Brixham.
- 10.2 We raise objections to the Council's high reliance on car parking sites in Paignton coming forward for residential development in the first five years of the Plan period. This is because all of these sites are constrained particularly in relation to flood risk. The feasibility of these car parks coming forward is also unlikely given that sufficient car parking must be retained to meet the travel needs of the town. The impact of development upon the vitality and viability of the town centre must be taken into account. Furthermore, the allocation of such sites does not take into account that they might be subject to referendums, which could prevent them coming forward at all.
- 10.3 In terms of Paignton, there are five identified car parks which have been identified for residential development:
- Victoria multi-storey car park is in a poor state of repair and is programmed for refurbishment to become the 'main parking point' in Paignton according to the SHLAA 2013 (Appendix D). This site has good access to the main shopping area and all local services and amenities and the SHLAA 2013 describes the site as having a high existing use value and states that market conditions suggest it is unlikely to deliver in the short to medium term. It is also located within Flood Zone 3 and significant flood defence infrastructure would be required to protect the site. It is possible that this site may be considered an 'option' for later in the Plan period, but site constraints, existing value of the site as a car park and market conditions suggest this site is unlikely to come forward particularly in the first five years of the Plan period.
 - In the SHLAA 2013, Station Lane / Great Western car park it is understood that current proposals at this site precludes housing. The car park is adjacent to a flood risk area and is also located within the designated Town Centre (TC1, TC2.1), which is considered more appropriate for commercial / employment development.
 - Paignton Harbour car park is located adjacent to Paignton Harbour and Roundham Head SSSI and to a flood risk area. The site is subject to constraints which would impede its delivery for residential development. It is located within a Core Tourism Investment Area where the focus according to the New Local Plan (Policy TO1) is on the retention and creation of new, high quality tourism and leisure facilities and accommodation in accessible areas. Therefore, it is noted that the site should be retained as a car park for tourists visiting Paignton Harbour or used for some other tourism purpose rather than residential development.

- Churchwood Road car park and Preston Garden car park are located within a flood risk area and thus without significant flood defence infrastructure are unlikely to come forward. These sites were identified in the 2008 SHLAA and there has been no evidence in the last 7 years of them coming forward for development.

- 10.4 The above car parking sites are all constrained and the retention of sufficient car parking in Paignton clearly needs to be resolved before these car parking sites come forward for residential development. While we have not considered the other car parking sites in Torquay and Brixham in detail, it is anticipated that similar matters arise with their potential development. This raises doubts about their potential to be brought forward for development in the first five years of the Plan. This will have implications for the level of housing that will come forward and means that alternative sources need to be considered to meet the requirements during the early part of the Plan period.
- 10.5 Furthermore, a proposal linked to the relocation of Churston Golf Club, which would have facilitated residential development, was recently dismissed on appeal (Appeal Ref: APP/X1165/A/13/2205208) and should be deleted from the Local Plan altogether and not just moved back in the Plan period. It is considered that this site is unlikely to have any potential for housing development.
- 10.6 We are therefore concerned that the Council have relied heavily upon car park sites and Churston Golf Club to meet housing needs in Torbay, which will have implications in relation to the amount of housing that will come forward during the first five years of the Plan period. This means that alternative sources need to be considered to meet the requirements during the early part of the Plan period.

11. Conclusion

- 11.1 These representations on the Proposed Main Modifications to Torbay Local Plan (2012-2032) have been prepared by Boyer on behalf of Bloor Homes (South West) Limited in respect of Land to the North of Totnes Road, Collaton St Mary. These representations relate only to the suggested modifications, and not to the Plan as a whole.
- 11.2 The following points provide an overview of the main issues identified in the representations and aim to set out succinctly Bloor Homes' position in that they:
- Support the increase in overall housing numbers to 10,000 dwellings between 2012-32 but note that the fully objectively assessed needs are not being met in full;
 - Support the early delivery of development in Future Growth Areas, subject to relevant planning matters being addressed;
 - Support clarification of process to bring forward Site Allocation DPDs if Neighbourhood Plans are not submitted timeously, or if there is a danger of five year supply not being maintained;
 - Request that a definite timeframe is putting in place – across all relevant policies – for when the preparation of the Site Allocations DPDs are to start;
 - Strongly object to the reduction in housing numbers at Totnes Road as a result of masterplanning;
 - Object to the new proposed Future Growth Area on Land south of White Rock; and
 - Object to the requirement to provide a GHB mitigation plan for all development within Future Growth Areas
- 11.3 Bloor Homes (South West) Limited would welcome the opportunity to further engage with Torbay Council regarding Land to the North of Totnes Road, Paignton.

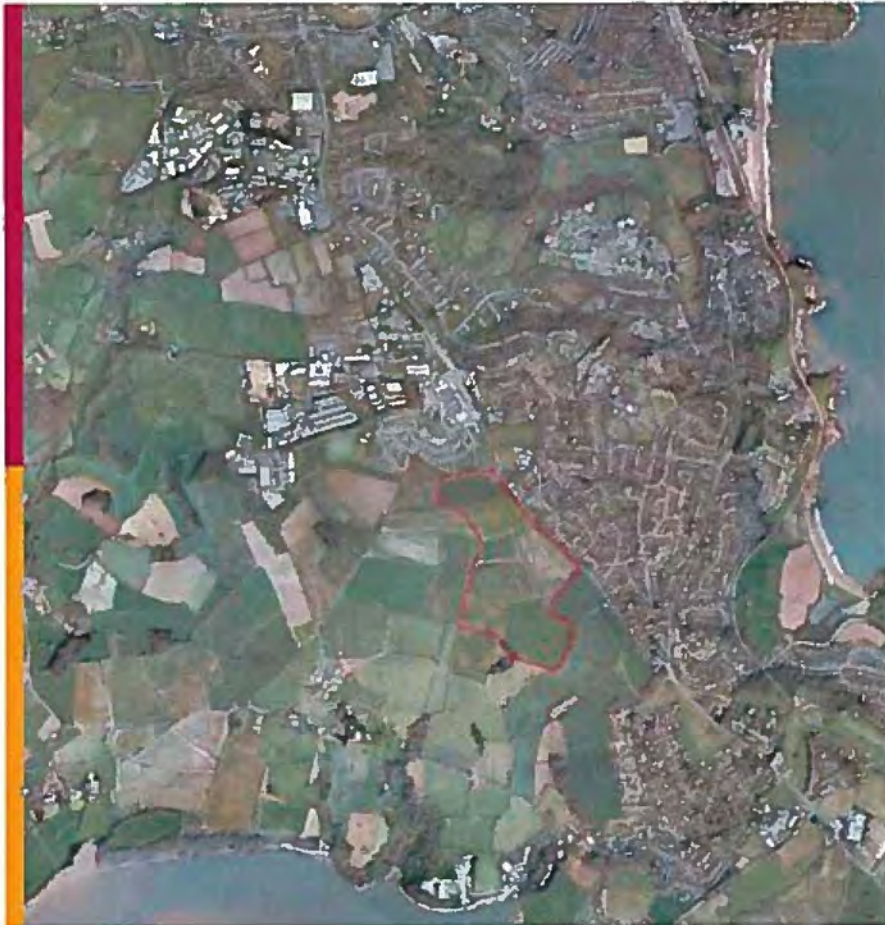


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Torbay Local Plan

Proposed Modifications Consultation Response

Abacus

Stride Treglown job no.	15108
Prepared by	MH
Checked by	GKS
Date	March 2015
Revision	ISSUE

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1. Introduction

1.1. The New Local Plan

1.1.1 This report has been prepared in response to Torbay Council's (the Council) consultation on proposed changes to the emerging New Local Plan (the Plan). The changes have been proposed following the initial public examination hearings held in November 2014 and the publication, by the Council, of the Inspector's initial findings.

1.1.2 The report has been prepared and is submitted on behalf of our client, Abacus/Deeley Freed Estates, and is done so within the context of their land holding, referred to as Land South of White Rock (the site). Our response is made in part as an active participant in the preparation and examination of the new Local Plan but also in relation to ongoing land promotion work.

1.1.3 Work to promote the site has been ongoing throughout 2014 and included active representation and participation at the November 2014 examination hearings. This response is made following the Council's proposal to include the site as a Future Growth Area (FGA) within the Plan and therefore the comments largely focus on this matter.

1.1.4 This report has considered the following documents, all accessed via the Council's 'New Local Plan' webpage following the commencement of the public consultation period:

- Schedule of Proposed Main Modifications to the Local Plan (including Annexes 1 and 2);
- Schedule of Proposed Additional (Minor) Modifications to the Local Plan (including Annex 1);
- Schedule of Proposed Changes to the Sustainability Appraisal Report;
- Detailed Sustainability Appraisal of Proposed Additional Sites with Potential for Development to be Included as Proposed Main Modifications to the Local Plan; and
- HRA Site Appraisal Report of Torbay Local Plan Strategic Delivery Areas.

1.1.5 The document is broadly structured around the documents outlined above. In addition, whilst the Council have previously been aware of our client's emerging land promotion work and ongoing technical survey work, we are mindful that at this stage the Inspector examining the Plan has not had sight of any formal documentation, albeit this was referred to during public hearings. Therefore, our latest available Land Promotion Report is included as a submission document with this report.

1.2. Additional Consultation

1.2.1 In addition to consultation on changes to the Plan, the Council have also published further draft documents for consultation, namely:

- a Proposed Draft Community Infrastructure (CIL) Charging Schedule and Draft Regulation 123 List; and
- a new Draft Local List for Validation of Planning Applications.

1.2.2 Comments are provided on these within Chapter 5 of this report.

2. Proposed Main Modifications

2.1. Introduction

2.1.1 This Chapter provides comments on the published Proposed Main Modifications document. In general terms, we are in support of the proposed modifications to the Plan and believe that they make significant, positive steps to ensure that the Plan is genuinely spatial and sets out a clear strategy for growth through to 2032 and beyond, whilst ensuring that the unique environment and constraints which this presents are considered.

2.1.2 The remainder of this Chapter sets out specific comments on the proposed Main Modification (MM).

2.2. MM1

2.2.1 We **support** the proposed changes to Policy SS1.

2.2.2 Specifically, the clarification of policy on housing numbers is welcomed. Whilst there were conflicting views presented at the examination hearings, the decision to apply a single figure is essential.

2.2.3 Furthermore, for this to be at the top end of the range previously published is important in order to accord with the principles contained within the National Planning Policy Framework (NPPF), namely basing housing targets on evidence and, more broadly, to boost the supply of land for housing in order to meet identified need.

2.2.4 In addition, we welcome the clarity provided in relation to how sites will be identified in the mid to later stages of the plan period. The mechanism to commence work on a Site Allocations DPD if Neighbourhood Plans fail to progress is a pragmatic approach in order to ensure policy is in place to support delivery.

2.3. MM2

2.3.1 We **support** the proposed amendments to paragraph 4.1.25.

2.3.2 The acknowledgement that there is "active developer interest" in sites within the FGAs, and within the context of this consultation response, Land South of White Rock, is a sensible approach to be adopted by the Council. Whilst the FGA are generally noted to have the potential for delivery later in the plan period, it is pragmatic to recognise that, where the market allows, developers may have scope to commence work at an earlier stage. The requirement to address matters including infrastructure provision and environmental matters is supported as part of the general development planning process.

2.3.3 Comment on the potential for a Site Allocations DPD is provided in response to MM1.

2.4. MM3

2.4.1 We **support** the proposed amendment to Policy SS2, specifically the inclusion (at point 4) of Land South of White Rock as a FGA.

- 2.4.2 In particular, we welcome the Council's recognition of the potential of the Site, demonstrated within the Land Promotion Report prepared to support the promotion of the site through the Local Plan process. Further, the Council's acknowledgement that a single site, such as this, has the potential to deliver mixed-use development with significant potential for wider community benefits (including but not limited to countryside access opportunities) is welcomed. As noted during the examination hearings, our client has a positive track record of the delivery of such sites and are encouraged by the Council's support to continue this work.

Clarification Required

- 2.4.3 Whilst supporting the proposed modification, it is noted that there is a potential minor error in how the site is referenced. Within MM3 the FGA is referred to as "SDB3.2" whereas within Annex 2 to the Main Modifications document, revised Table 5.14 refers to the site as "SDB1". Clarification is required in the interests of consistency.

2.5. MM8

- 2.5.1 As noted within the response to MM1, we **support** the enhanced approach to site allocations and the relationship with the Neighbourhood Plan process.

2.6. MM4 - 7 and 9 - 14

- 2.6.1 These MMs are **supported** albeit there are no specific comments.

3. Proposed Additional (Minor) Modifications and Additional Documents

3.1. Introduction

3.1.1 This chapter provides our response to the schedule of Proposed Additional (Minor) Modifications (AM). In the interests of brevity, comments are restricted to specific changes.

3.2. Additional (Minor) Modifications

AM16

3.2.1 There appears to be a need for editorial clarifications to ensure that correct reference is made to the new FGA on land south of White Rock.

3.2.2 AM16 refers to changes to the Key Diagram. A revised diagram was provided as part of an errata issued by the Council during February. The diagram denotes an area for SDB3.2 'Brixham Urban Fringe & Area of Outstanding Natural Beauty' sitting over the east of Brixham. However, MM3 notes that the FGA for land south of White Rock is to be referenced as SDB3.2 also.

3.2.3 Having made contact with the Council advice has been provided which notes that the FGA south of White Rock is to be referenced as SDB1. The area is provided with a 'Brixham' code to reflect its inclusion within the Brixham Neighbourhood Plan area, despite closer, functional interaction with Paignton.

3.2.4 Broadly speaking, the allocation of a 'Brixham' code to the FGA is sensible and supported, reflecting the boundaries of the Neighbourhood Plan Areas. However, for the avoidance of doubt when the Plan is read as a whole, it is suggested that editorial review is carried out and changes made (where required) in order to ensure consistent referencing throughout the Plan, including on diagrams.

AM19

3.2.5 In order to ensure consistency with the changes proposed to Policy SS2 by MM3, it would appear that the text proposed within AM19 should read as follows:

"Greater horseshoe bat mitigation strategies for the ~~four~~ *five* Future Growth Areas..."

3.2.6 This change is proposed for editorial clarification purposes only and does not amend the thrust of the policy wording.

3.3. Additional Documents

3.3.1 As noted within the Introduction, our review of proposed changes has also considered the proposed changes to the Sustainability Appraisal report along with the Sustainability Appraisal and HRA Site Appraisal Report for the additional sites proposed within the Plan, including the land south of White Rock.

3.3.2 We have no specific comments to make other than noting the contents of each report.

4. Land Promotion Report

4.1. Introduction

4.1.1 As set out in the Introduction Chapter of this consultation response, work to promote the potential development on the site has been ongoing throughout 2014.

4.1.2 The work undertaken has included active participation in the Local Plan preparation and examination process carried out to date, specifically in the form of having made representations to the draft Local Plan prior to submission and participation in the hearing sessions held in November 2014.

4.2. Draft Land Promotion Study (LPS)

4.2.1 The Draft LPS has been prepared having had regard to a number of key issues, including:

- The relevant national and local planning framework;
- Potential landscape and visual impact, with particular reference to the AONB to the south;
- Impacts on local ecology;
- Highways, including site access; and
- Drainage.

4.2.2 Work has been undertaken in order to clearly understand these issues and establish an initial site conditions baseline. Where appropriate, the output of this work has included principles to be considered in relation to scheme design, potential design solutions and possible works to mitigate for impacts.

4.2.3 This report does not reproduce the LPS. It is however appended to this report for further consideration as required and/or appropriate. The table below signposts relevant matters which may be considered to be of importance.

Matter	Location within LPS
Planning Context , including relevant planning history and policy context	Chapter 2 (page 8)
General site background	Chapter 3 (page 14)
Landscape and Visual Impact Study , including topography, public rights of way, landscape designations and character and visual assessment	Chapter 3 (page 20)
Transport, Access and Movement , setting out the existing assessment for development at White Rock and indications for future assessment work	Chapter 3 (page 44)
Topography and Drainage , in the form of a high level site summary	Chapter 3 (page 46)
Ecology , including a Phase 1 Habitat Survey and Bat Activity Surveys	Chapter 3 (page 49)
Baseline Summary (of the above)	Chapter 4 (page 54)
Development Concepts , establishing general urban design principles based on the baseline work	Chapter 5 (page 56)
Development Proposals , a development concept for residential development	Chapter 6 (page 60)
Visual Impact , 3D visualisations from 6 key viewpoints, drawn from the LVIS	Chapter 7 (page 64)

4.3. Emerging Design - Principles

4.3.1 The results of the work contained with the LPS baseline have, as noted above, resulted in the production of a development concept for the site. This has considered the results of the baseline assessment work along a further three key matters:

- 1) Pedestrian and cycling routes and links to the existing urban area;
- 2) Vehicular access routes into the site from the road network; and

3) Hedgerows, both existing and proposed.

Within the above, we have also given consideration as to how access to the surrounding countryside can be achieved, in accordance with aspirations within the emerging Plan to enhance opportunities.

4.4. Emerging Design - Development

- 4.4.1 The preferred option development proposal identifies that the site has the potential approximately 328 dwellings and 3-3,500sq m of employment and/or retail space. This development is contained wholly within our client's landholding.
- 4.4.2 In addition to this, we have identified broad capacity, following the same established design principles and responding to the baseline, to accommodate approximately 135 units on land south of the identified red line on land adjacent to Brixham Road, towards Windy Corner. This land is outside of our client's landholding but is within the FGA.
- 4.4.3 As noted in the table above, Chapter 7 of the LPS presents montages of the proposed development from 6 key viewpoints, drawn from those used in the LVIS and selected on the basis of the potential openness of views and their location within the South Hams AONB.
- 4.4.4 The images were included in order to provide comfort that any potential landscape impacts, including cross boundary views, are addressed. It is our professional view, including that of our in-house landscape architects, that the impacts are limited in nature.

4.5. Anticipated Future Work

- 4.5.1 Chapter 8 of the LPS sets out the likely work which is considered to be required in order to move forward with the project. On the assumption that the Council's proposal to include the land as a FGA within the final Local Plan is progressed through to adoption, any matters identified as needing to be addressed by relevant Local Plan policy will be added to the future work programme.

5. Additional Consultations

5.1. Community Infrastructure Levy (CIL)

5.1.1 The Council have published a Draft (CIL Charging Schedule for consultation. This includes a Draft Regulation 123 list outlining the infrastructure requirements within the local area.

5.1.2 We have no consultation response to make to either the Draft Charging Schedule or the Draft Regulations 123 list. We would however appreciate being retained on the list of those to be consulted in the future.

5.2. Local Validation List

5.2.1 The Council have published a revised Draft Local Validation List for consultation. The list is noted to set out those documents required by the Council over and above the National requirements set out in the Town and Country Planning (Development Management Procedures) (England) Order 2010 (the DMPO).

5.2.2 We have no consultation response to make on the list.

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WHITE ROCK, TORBAY

Bat Activity Survey

Client: Stride Treglown

Reference: J005441

Date: July 2014

Issue:	Date:	Author:	Amended by:	Reviewed/Approved by:
One		FrB	SK	SK
Three	12 November 2014	FrB	MA	SK

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NON-TECHNICAL SUMMARY

Site location and size	White Rock Phase 2, Paignton, Devon; Grid reference: SX 876 578; 30.6ha
Scope of Works	Bat Activity Surveys
Purpose of Works	To inform a planning application
Dates of site visits and names of surveyors	<p>23 May 2014; Andrew Charles 28 May 2014; Andrew Charles 12 June 2014; Andrew Charles 25 June 2014; Tamsin Lee 30 July 2014; Marc Anderton 31 July 2014; Andrew Charles 28 August 2014; Helen Ward 09 September 2014; Tamsin Lee 17 September 2014; Tamsin Lee 29 September 2014; Tamsin Lee</p> <p>A static detector was also deployed in August and September 2014.</p>
Overview	<p>Bat activity surveys at the site recorded species including noctule, common pipistrelle and <i>Myotis</i> species, whilst priority species including greater horseshoe and Barbastelle were also recorded. The majority of bat activity recorded was from commuting and foraging along hedgerow boundaries and within close proximity to a woodland copse to the south of the site.</p> <p>Static bat detectors recorded moderate activity across the southern site boundaries displaying an assemblage of common pipistrelle bats, noctule bats and greater horseshoes.</p>
Recommendations for further surveys	No further surveys recommended
Recommendations for protection of ecological features	<p>Hedgerows should be retained and enhanced in the long-term to maintain opportunities for bats, particularly horseshoe bats and barbastelles. Where not possible, alternative compensatory habitat should be created on or adjacent to the site.</p> <p>A sensitive lighting scheme should be implemented on site to retain dark corridors for bats. Where not possible, alternative off-site mitigation should be created to maintain opportunities for horseshoe bats and barbastelles in the local area.</p>
Recommendations for enhancement	<p>Bat roosting features on new buildings and retained trees</p> <p>Ecological input into landscaping scheme</p>

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3 Results 3

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5 Limitations of Survey and Report 5

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Appendix II: Survey results..... III

1 INTRODUCTION

1.1 In April 2014, Ecosulis was commissioned by Stride Treglown to undertake bat activity surveys of land at White Rock, Torbay. These surveys are required to inform a planning application for the White Rock 2 Urban Extension.

1.2 Ecologists from Ecosulis visited the site in May, June, July, August and September 2014 to undertake the surveys. Access was provided by the landowner.

Objectives of Study

1.3 The objectives of this study are: to provide information on the existing ecological conditions at the site; to identify potential constraints and opportunities that ecology may pose to the development plans; and to identify further ecological studies that may be required to ensure that ecology is fully considered within the proposals.

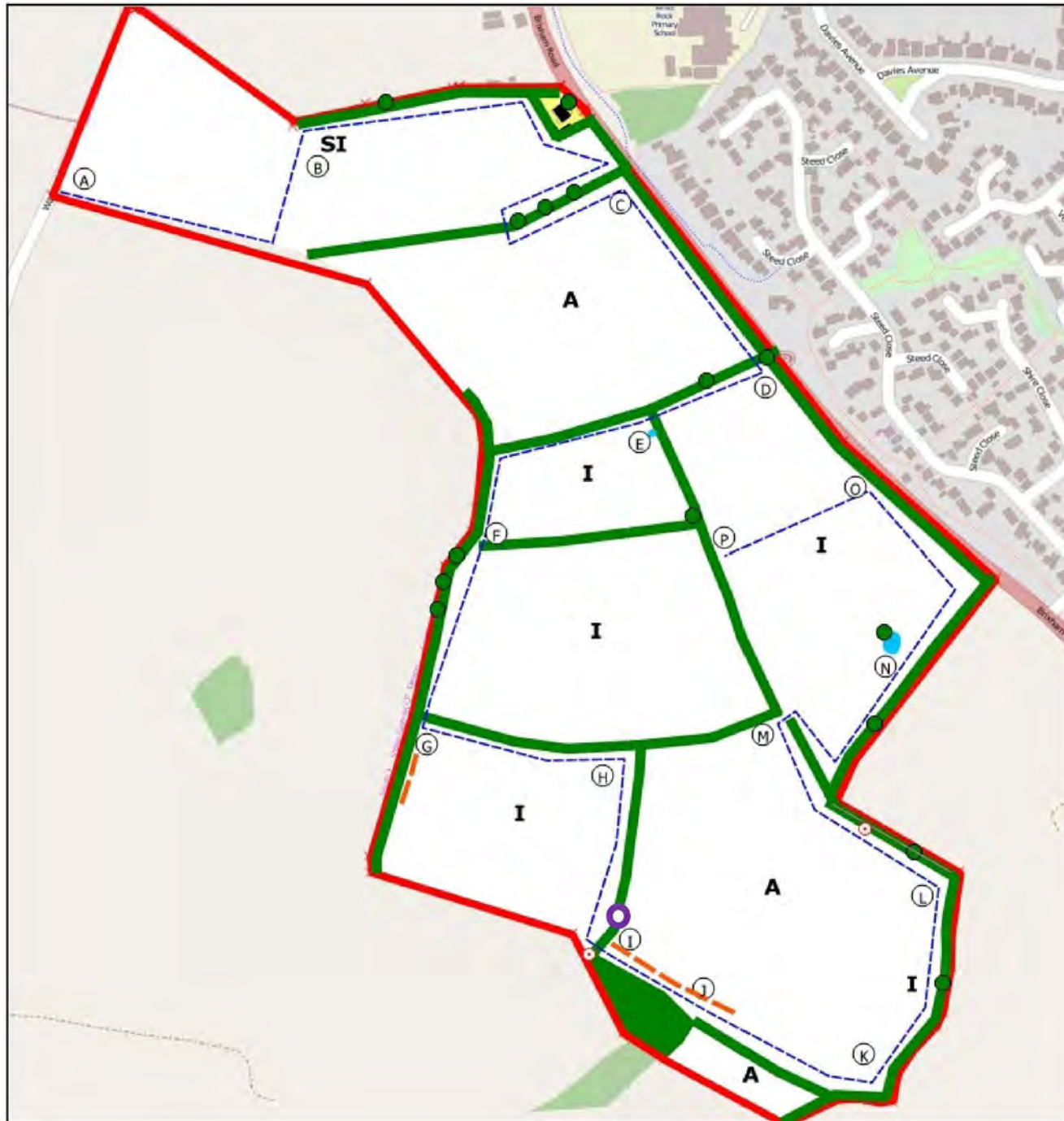
General Description of Site

1.4 The site is located west of the Torbay ring-road, to the west of the built-up area of Paignton. It covers an area of approximately 30.6ha, and is centred on Ordnance Survey (OS) grid reference SX876 578, shown on Figure 1. The site comprises buildings, semi-improved grassland, improved grassland, arable land, hedgerows, semi-natural broadleaved (mixed) woodland and two ponds.

1.5 The Torbay ring-road bounds the site to the east, with the urban area of Goodrington (a residential suburb of Paignton) beyond. Recently developed employment land runs along Long Road and bounds the site to the north, whilst open fields lie to the south and west.

Nomenclature

1.6 The common name only of flora and fauna species is given in the main text of this report; however, Latin names are used for species where no common name is available. A full list of all species recorded on site during the surveys is given in Appendix I with their Latin names. All plant names follow the nomenclature of Stace (2010).



Legend

- Boundary
- Greater Horseshoe Activity Lines
- Bat Listening Point
- Transect
- Static Detector Location

Reproduced from Ordnance Survey mapping of the Controller of Her Majesty's Stationery Office © Acc: 100011381



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Client	Stride Treglown	
Project	White Rock	
Title	Bat Activity Survey	
Date	Scale	Figure
Nov 2014	SCHMATIC ONLY	1

2 METHODS

Bat Activity Survey

- 2.1 Evening activity surveys were undertaken on the 23 and 28 May, 12 and 25 June, 30 and 31 July, 28 August and 9, 17 and 29 September 2014. Surveys were led by Tamsin Lee, Andrew Charles, Helen Ward and Marc Anderton, all experienced ecologists and representatives of Ecosulis. These surveys were undertaken in accordance with the Bat Mitigation Guidelines (English Nature, 2004) and Bat Conservation Trust Survey Guidelines 2012.
- 2.2 A transect was identified for the purpose of the activity surveys which covered all areas of interest that have been identified based on the proposed lighting. This was used during each of the surveys. Listening points along transect were identified and during each survey stops of ten minutes were taken at each. The location of these listening points is shown in Figure 1. Each activity survey commenced at sunset and continued for three hours after sunset. Duet bat detectors were used to detect and record bats present, their flight lines and foraging areas. Recordings were later analysed (if required) by an expert using the dedicated computer software.
- 2.3 Frequency division 'duet' bat detectors were used together with visual observations on flight patterns and feeding behaviour to aid identification to species level. One surveyor had their detector set to 82 kHz for the duration of the survey and the other had their detector set at 110 kHz, the approximate peak frequency for greater horseshoe bats and lesser horseshoe bats, respectively. Notes were recorded on times, locations, species and behaviour.

Static Bat detector

- 2.4 In addition, an anabat was deployed on the site in August and September along the southern site hedgerow boundary to record general bat activity on site.

3 RESULTS

- 3.1 Full survey results can be found in Appendix 2. During the survey visits an assemblage of common bats such as common pipistrelle were recorded to be using the site and were either foraging or commuting along hedgerows. Additional species such as noctule and leisler's were also recorded commuting over the site.
- 3.2 Priority bat species such as greater horseshoe were recorded commuting and foraging along the southern site boundaries during the July surveys (see Figure 1 for Horseshoe flight paths). Barbastelle were also recorded along the northern site boundary along hedgerows whilst also being recorded along the southern site boundary within close proximity to the woodland copse.
- 3.3 In addition, static bat recorders recorded moderate activity along the southern hedgerow site boundary. An assemblage of common pipistrelle bats and noctule bats were recorded and two greater horseshoes were also recorded (see Figure 1 showing static location).
- 3.4 Small numbers of greater horseshoe bats (five passes recorded in total) appear to be utilising the southern hedgerow boundaries along with the small woodland copse (recorded at listening points G, K, and J, see Figure 1). Dark corridors present in the south provide good conditions for horseshoe bats and is likely to be used by horseshoe bats throughout the spring and summer months.

4 ASSESSMENT AND RECOMMENDATIONS

- 4.1 All British species of bat and their place of shelter are protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010 from deliberate capture, injury and killing, intentional or reckless disturbance, intentional or reckless obstruction of access to any structure or place which any such animal uses for shelter or protection, and deliberate damage or destruction of a breeding site or resting place. This includes buildings and trees and applies throughout the year whether bats are present or not at the time of survey or work being carried out.
- 4.2 Although foraging areas and commuting routes are not legally protected, the effects of development proposals on these are a material consideration when assessing the impact of the proposal on the maintenance of favourable conservation status (NPPF).
- 4.3 This survey found that the site provides suitable foraging and commuting opportunities for common and priority bat species. Boundary of habitats on site, particularly woodland habitats, provides suitable dark corridors for light sensitive species. It is recommended that traditional management of hedgerows, grassland and woodland is undertaken to increase insect biomass across the site. Sensitive lighting schemes should be implemented to direct light away from boundary habitats, particularly southern hedgerow and woodland boundaries, and therefore retain dark corridors across the site. It is also recommended that bat boxes and other features designed for roosting bats are installed and monitored and checked annually at an appropriate time of year.
- 4.4 The development will result in the loss of suitable habitats on the site, and the site is unlikely to provide suitable habitat for horseshoe bats due to likely light spill. As a result, off-site mitigation should be considered to ensure that an ecological enhancement is provided as a result of the scheme, and to ensure that opportunities for horseshoe bats are retained and enhanced in the local area.
- 4.5 In order to enhance the site for bat species post-development it is recommended that night scented flowers are incorporated into the landscaping plan. This will aid bat species by encouraging nocturnal invertebrate species, providing additional bat foraging opportunities. Consideration should also be given to installing bat roosting features such as bat bricks on new buildings on the site.

5 LIMITATIONS OF SURVEY AND REPORT

- 5.1 This report records wildlife found during the survey and anecdotal evidence of sightings. It does not record any plants or animals that may appear at other times of the year and were therefore not evident at the time of visit. Some species that might use the site or be apparent at other times of year, or only in certain years, would not have been detected.
- 5.2 This report provides provisional ecological baseline for the site and should not be considered to be conclusive until the ecological considerations have been undertaken and all necessary further surveys completed. Likewise the ecological considerations at this stage are not necessarily final and may be subject to change or additional proposals made following the results of further surveys and detailed development plans.
- 5.3 The behaviour of animals can be unpredictable and may not conform to standard patterns recorded in current scientific literature. This report therefore cannot predict with absolute certainty that animal species will occur in apparently suitable locations or habitats or that they will not occur in locations or habitats that appear unsuitable.
- 5.4 The data search can only provide information on species already recorded and cannot be taken to represent a complete overview of all species present in the survey site.
- 5.5 The advice contained in this report relate primarily to factual survey results and general guidance only. On all legal matters you are advised to take legal advice.

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Appendix I: SPECIES LIST

Fauna	
Common Name	Latin Name
Barbastelle	<i>Barbastellus barbastellus</i>
Brown Long-eared	<i>Plecotus auritus</i>
Common pipistrelle	<i>Pipistrellus pipistrellus</i>
Greater Horseshoe	<i>Rhinolophus ferrumequinum</i>
Leisler's	<i>Nyctalus leisleri</i>
Myotis sp.	<i>Myotis spp.</i>
Noctule	<i>Nyctalus noctula</i>
Serotine	<i>Eptesicus serotinus</i>
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>

Appendix II: FULL SURVEY RESULTS

DATE: 23/05/2014	START TIME: 20.51	WEATHER: 10% CLOUD, 11°C,		
	END TIME: 00.06	WEATHER: 10% CLOUD, 10°C		
GENERAL WEATHER NOTES: DRY, LIGHT BREEZE				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
G	21:37	Noctule	1	Brief pass near standard trees on hedge, not seen.
H	22:23	Common pipistrelle	1	Heard foraging, not seen.
I	22:30	Common pipistrelle	1	Heard foraging, not seen.
N	22:46	Common pipistrelle	1	Pass in semi-improved field, not seen.
O	22:57	Common pipistrelle	1	Foraging in corner, near road, for a few minutes.
A	23:22	Common pipistrelle	2	Heard foraging in corner of arable field.
B	23:23	Common pipistrelle	1	Pass along hedgerow next to main road.

DATE: 28/05/2014	START TIME: 20.57	WEATHER: 50% CLOUD, 11°C,		
	END TIME: 00.15	WEATHER: 100% CLOUD, 10°C		
GENERAL WEATHER NOTES: DRY, LIGHT BREEZE				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
G	21:28	Common pipistrelle	1	Brief pass near standard trees on hedge, not seen.
H	21:46	Common pipistrelle	1	Heard foraging, not seen.
I	22:02	Common pipistrelle	1	Commuting
N	22:04	Common pipistrelle	1	Heard foraging, not seen.
O	22:19	Common pipistrelle	2	Foraging
		Leisler's		
A	22:32	Common pipistrelle	1	Heard foraging in corner of arable field.
B	23:23	Common pipistrelle	1	Pass along hedgerow
C	23:37	Common pipistrelle	1	Heard foraging, not seen.
C	24:39	Common pipistrelle	1	Heard foraging, not seen.

DATE: 12/06/2014		START TIME: 21.05	WEATHER: 10% CLOUD, 18°C,	
		END TIME: 00.30	WEATHER: 15% CLOUD, 13°C	
GENERAL WEATHER NOTES: DRY, LIGHT BREEZE				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
G	21:39	Noctule	1	Brief pass near standard trees on hedge, not seen.
H	21:42	Brown Long eared	1	Heard foraging, not seen.
I	22:02	Common pipistrelle	1	Commuting
N	22:04	Common pipistrelle	1	Heard foraging, not seen.
O	22:19	Common pipistrelle Leisler's	2	Foraging
A	22:32	Common pipistrelle	1	Heard foraging in corner of arable field.
B	23:23	Common pipistrelle	1	Pass along hedgerow
B	23:05	Barbastelle	1	Commuting
C	23:39	Common pipistrelle	1	Heard foraging, not seen.
D	23:40	Common pipistrelle	1	Heard foraging, not seen.
E	23:50	Common pipistrelle	1	Heard foraging, not seen.

DATE: 25/06/2014		START TIME: 21.35	WEATHER: 80% CLOUD, 15°C,	
		END TIME: 00.35	WEATHER: 80% CLOUD, 14°C	
GENERAL WEATHER NOTES: DRY, LIGHT BREEZE				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
M	22:20	Common pipistrelle	1	Brief pass near standard trees on hedge, not seen.
M	22:30	Common pipistrelle	1	Pass along hedge, not seen
N	22:33	Common pipistrelle	1	Heard foraging, not seen.
O	22:51	Common pipistrelle	1	Pass in semi-improved field, not seen.
C	22:53- 22:56	Common pipistrelle	1	Foraging in corner, near road, for a few minutes.
B	23:26	Common pipistrelle	2	Heard foraging in corner of arable field.
B	23:31	Common pipistrelle	1	Pass along hedgerow next to main road.
B	23:37	Common pipistrelle	2	Foraging near road

DATE: 25/06/2014	START TIME: 21.35	WEATHER: 80% CLOUD, 15°C,		
	END TIME: 00.35	WEATHER: 80% CLOUD, 14°C		
GENERAL WEATHER NOTES: DRY, LIGHT BREEZE				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
A	23:42	Common pipistrelle	2	Foraging up and down hedgerow next to main road.
D	23:44	Myotis sp	1	Brief pass, not seen.
E	23:51	Common pipistrelle	1	Brief pass, not seen
F	23:57	Silent bat pass	1	Near field gate – not picked up on detector or Anabat.
G	00:07 – 00:13	Common pipistrelle	1	Foraging activity at field junction.
G	00:17	Common pipistrelle	1	Pass, not seen

DATE: 30/07/2014	START TIME: 21.05	WEATHER: 10% CLOUD, 18°C,		
	END TIME: 00.30	WEATHER: 15% CLOUD, 13°C		
GENERAL WEATHER NOTES: DRY, LIGHT BREEZE				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
G	21:39	Noctule	1	Brief pass near standard trees on hedge, not seen.
H	21:42	Brown Long eared	1	Heard foraging, not seen.
I	22:02	Common pipistrelle	1	Commuting
N	22:04	Common pipistrelle	1	Heard foraging, not seen.
O	22:19	Common pipistrelle Leisler's	2	Foraging
A	22:32	Common pipistrelle	1	Heard foraging in corner of arable field.
B	23:23	Common pipistrelle	1	Pass along hedgerow
C	23:39	Common pipistrelle	1	Heard foraging, not seen.
D	23:40	Common pipistrelle	1	Heard foraging, not seen.
E	23:50	Common pipistrelle	1	Heard foraging, not seen.

DATE: 30/07/2014	START TIME: 21.03	WEATHER: 10% CLOUD, 17°C,		
	END TIME: 00.00	WEATHER: 20% CLOUD, 15°C		
GENERAL WEATHER NOTES: DRY, LIGHT BREEZE				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
F	21:57	Noctule	1	Commuting

DATE: 30/07/2014		START TIME: 21.03	WEATHER: 10% CLOUD, 17°C,	
		END TIME: 00.00	WEATHER: 20% CLOUD, 15°C	
GENERAL WEATHER NOTES: DRY, LIGHT BREEZE				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
G	22:03	Common pipistrelle	1	Heard foraging, not seen.
G	22:06	Common pipistrelle Greater horseshoe	2	Commuting
H	22:13	Common pipistrelle	1	Heard foraging, not seen.
I	22:19	Common pipistrelle	1	Commuting
I	22:24	Common pipistrelle	1	Heard foraging, not seen.
I	22:28	Common pipistrelle	1	Pass along hedgerow
I	22:31	Common pipistrelle	1	Commuting
I	22:39	Common pipistrelle	1	Heard foraging, not seen.
I	22:49	Myotis species	1	Heard foraging, not seen.
J	22:50	Common pipistrelle	1	Heard foraging, not seen.
K	23:00	Common pipistrelle	1	Heard foraging, not seen.
K/L	23:09	Common pipistrelle	1	Heard foraging, not seen.
L	23:17	Common pipistrelle	1	Heard foraging, not seen.
L/M	23:26	Common pipistrelle	1	Heard foraging, not seen.
M	23:28	Common pipistrelle	1	Commuting

DATE: 31/07/2014		START TIME: 21.03	WEATHER: 10% CLOUD, 17°C,	
		END TIME: 00.00	WEATHER: 20% CLOUD, 15°C	
GENERAL WEATHER NOTES: DRY, LIGHT BREEZE				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
F	21:57	Noctule	1	Commuting
G	22:03	Common pipistrelle	1	Heard foraging, not seen.
M	21:47	Common pipistrelle	1	Heard foraging, not seen.
L	22:19	Common pipistrelle	1	Commuting
L	22:24	Common pipistrelle	1	Heard foraging, not seen.
K	22:28	Common pipistrelle	1	Pass along hedgerow

DATE: 31/07/2014		START TIME: 21.03	WEATHER: 10% CLOUD, 17°C,	
		END TIME: 00.00	WEATHER: 20% CLOUD, 15°C	
GENERAL WEATHER NOTES: DRY, LIGHT BREEZE				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
K	22:31	Common pipistrelle	1	Commuting
K	22:32	Greater horseshoe bat	1	Commuting
K	22:39	Barbastelle	1	Heard foraging, not seen.
J	22:45	Greater Horseshoe	1	Heard foraging, not seen.
K	22:50	Common pipistrelle	1	Heard foraging, not seen.
K	23:09	Common pipistrelle	1	Heard foraging, not seen.
E	23:17	Common pipistrelle	1	Heard foraging, not seen.
C	23;26	Common pipistrelle	1	Heard foraging, not seen.
C	23:28	Common pipistrelle	1	Commuting

DATE: 28/08/2014		START TIME: 20:08	WEATHER: 40% CLOUD, 17°C	
		END TIME: 23:08	WEATHER: 40% CLOUD, 16°C	
GENERAL WEATHER NOTES: DRY				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
F	20:57	Common pipistrelle	1	Commuting
E	21:01	Common pipistrelle	1	Commuting
I	21:03	Common pipistrelle	1	Commuting
E	21:05	Common pipistrelle	1	Commuting
G	21:06	Common pipistrelle	1	Foraging
I	21:09	Common pipistrelle	1	Foraging
F	21:10	Common pipistrelle	1	Commuting
G	21:17	Common pipistrelle	1	Foraging
H	21:25	Leisler's	1	Commuting
I	21:30	Common pipistrelle	1	Foraging
H	21:31	Leisler's	1	Commuting
G	21:32	Common pipistrelle	2	Commuting
I	21:33	Leisler's	1	Commuting
F	21:42	Unknown	1	Commuting
H	21:49	Unknown	1	Commuting
E	21:51	Common pipistrelle	1	Commuting
G	21:58	Common pipistrelle	1	Commuting

DATE: 28/08/2014		START TIME: 20:08	WEATHER: 40% CLOUD, 17°C	
		END TIME: 23:08	WEATHER: 40% CLOUD, 16°C	
GENERAL WEATHER NOTES: DRY				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
N	22:00	Common pipistrelle	1	Commuting
D	22:05	Unknown	1	Commuting
M	22:06	Common pipistrelle	1	Commuting
C	22:09	Unknown	1	Commuting
M	22:09	Common pipistrelle	1	Foraging
M	22:10	Common pipistrelle	1	Foraging
C	22:13	Common pipistrelle	1	Foraging
C	22:14	Common pipistrelle	1	Commuting
C	22:16	<i>Myotis</i> sp.	1	Commuting
N	22:17	Common pipistrelle	1	Commuting
C	22:25	Unknown	1	Commuting
P	22:26	Unknown	1	Commuting
O	22:30	Serotine	1	Commuting
N	22:35	Unknown	1	Commuting
N	22:37	Common pipistrelle	1	Commuting

DATE: 09/09/2014		START TIME: 19:43	WEATHER: 20% CLOUD, 18°C	
		END TIME: 22:43	WEATHER: 20% CLOUD, 13°C	
GENERAL WEATHER NOTES: DRY, LIGHT BREEZE				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
E	20:21	Common pipistrelle	1	Commuting along hedge
F/G	20:36	Common pipistrelle	1	Brief pass
G	20:42	Common pipistrelle	1	Foraging
H	20:48 – 20:51	Common pipistrelle	1	Foraging around corner of field
H/I	20:54	Common pipistrelle	2	Foraging along hedge
I	20:58	Common pipistrelle	1	Foraging around hedge and tree line
J	21:04 – 21:07	Common pipistrelle	2	Commuting
J/K	21:08 – 21:11	<i>Pipistrelle</i> spp.	3	Foraging along hedgerow
K	21:14	<i>Pipistrelle</i> sp.	1	Distant pass
K/L	21:16 – 21:18	Common pipistrelle	1	Foraging along hedgerow
L	21:22	Common pipistrelle	1	Brief pass

DATE: 09/09/2014	START TIME: 19:43	WEATHER: 20% CLOUD, 18°C		
	END TIME: 22:43	WEATHER: 20% CLOUD, 13°C		
GENERAL WEATHER NOTES: DRY, LIGHT BREEZE				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
N	21:40	Common pipistrelle	1	Brief pass
O	21:45 – 21:48	Common pipistrelle and <i>Myotis</i> sp.	1+1	Foraging along hedgerow
P	21:52 – 21:55	<i>Myotis</i> sp.	1	Brief pass
C	22:07	Common pipistrelle	1	Brief pass
B/C	22:22 – 22:25	Common pipistrelle	2	Foraging along hedgerow

DATE: 17/09/2014	START TIME: 19:25	WEATHER: 80% CLOUD, 20°C		
	END TIME: 22:25	WEATHER: 80% CLOUD, 17°C		
GENERAL WEATHER NOTES: DRY, LIGHT BREEZE				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
D	20:01 – 20:04	Common pipistrelle	2	Foraging in corner
F/G	20:19	Common pipistrelle	1	Commuting
H	20:32	Common pipistrelle	1	Commuting
H/I	20:42	Common pipistrelle	1	Commuting
I	20:43 – 20:46	Common pipistrelle	1	Foraging around trees
M	21:37	<i>Pipistrelle</i> sp.	1	Brief pass
N	21:42	Brown Long-eared	1	Foraging within tree line
N/O	21:47 – 21:53	Common pipistrelle	1	Foraging next to road
O	21:55	Common pipistrelle	3	Foraging briefly
D	22:03	Common pipistrelle	1	Brief pass

DATE: 29/09/2014	START TIME: 18:58	WEATHER: 20% CLOUD, 19°C		
	END TIME: 21:58	WEATHER: 20% CLOUD, 16°C		
GENERAL WEATHER NOTES: DRY, LIGHT BREEZE				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
B/C	19:39	Common pipistrelle	1	Brief pass
C	19:42 – 19:45	Common pipistrelle	3	Commuting
D	19:55	Common pipistrelle	1	Commuting
D/E	20:06	<i>Myotis</i> sp.	1	Commuting
F	20:21 – 20:23	Common pipistrelle	1	Foraging
M	21:07	<i>Myotis</i> sp.	1	Commuting

DATE: 29/09/2014	START TIME: 18:58	WEATHER: 20% CLOUD, 19°C		
	END TIME: 21:58	WEATHER: 20% CLOUD, 16°C		
GENERAL WEATHER NOTES: DRY, LIGHT BREEZE				
LOCATION	TIME	SPECIES	NUMBER	BEHAVIOUR
N	21:11 – 21:14	Common pipistrelle	1	Foraging around hedgerow
O	21:19	Common pipistrelle	1	Foraging near road
C	21:42	<i>Pipistrelle</i> sp.	1	Brief pass



White Rock 2 Urban Extension
Land Promotion Study

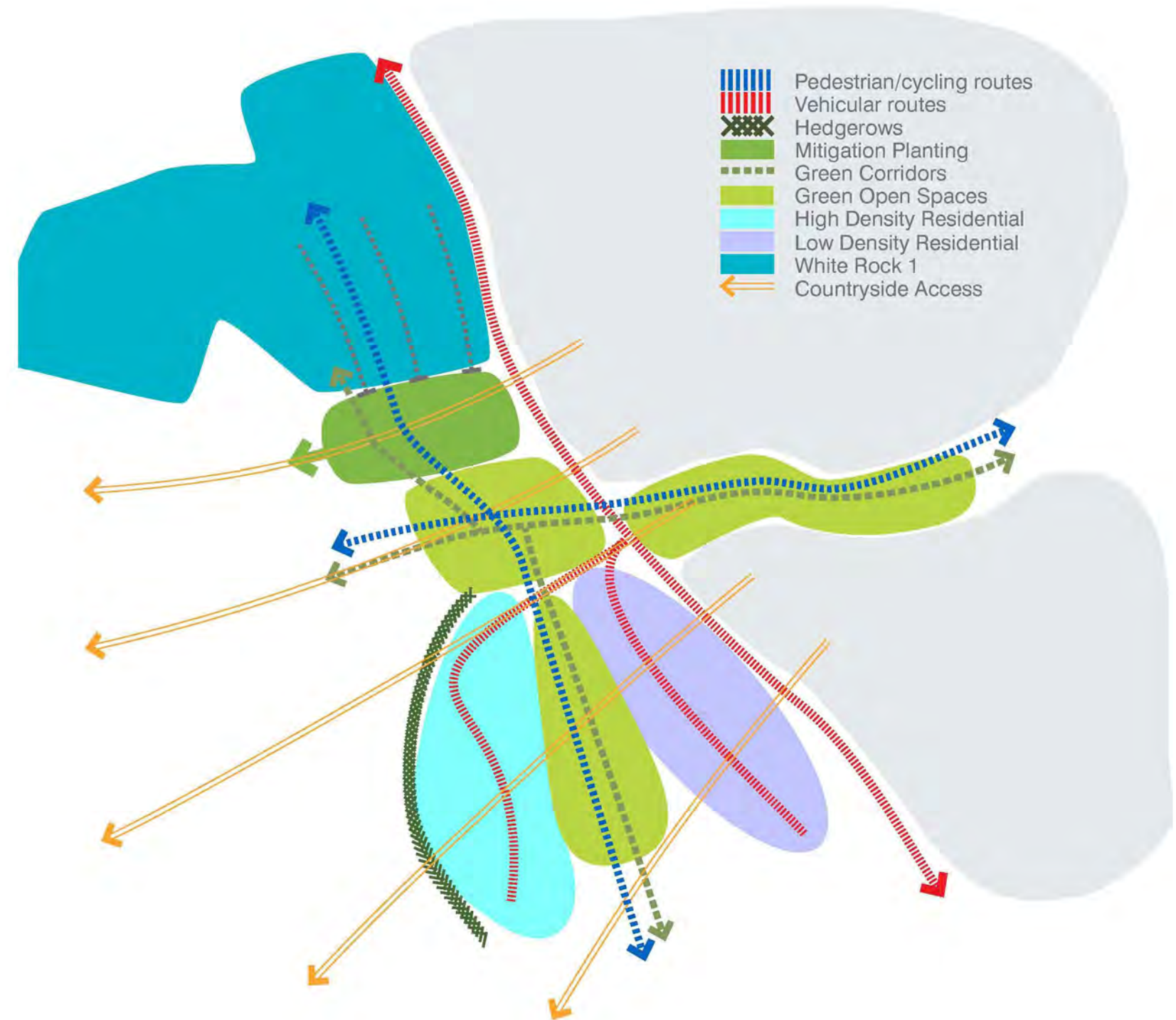
March 2015

STRIDE TREGLOWN JOB NO.	15108
PREPARED BY	MH/DP/PS
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White Rock 2 Urban Extension
Draft Land Promotion Study

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0 | Executive Summary

This Draft Land Promotion Study has been prepared by Stride Treglown on behalf of Abacus Projects/Deeley Freed Estates for the proposed development of land south of the permitted White Rock scheme, both of which are located on the Brixham Road corridor. This expansion site is referred to as 'White Rock 2' throughout this report.

The Report includes external contributions from WYG (Transport, Access and Movement), Clarke Bond (Drainage) and Ecosulis (Ecology). From within Stride Treglown, the study draws on the work of Stride Treglown Landscape Architects. Finally, the work of Archeadia (Archeological Consultants, employed to inform the 2011 White Rock 1 Outline Planning Application) is drawn upon within the Baseline Section

The development of White Rock 2 presents a significant opportunity to further develop the wider White Rock area and provide a comprehensive mixed use urban extension located on the western edge of Paignton.

A development of this form would deliver sustainable long term growth for the locality, ensuring a supply of high quality urban space comprised of housing, employment and retail uses along with associated community facilities and open space.

This Study is an update of extensive work undertaken across the wider White Rock area over a number of years. It is informed by a range of studies and surveys, including:

- an updated landscape and visual impact study (2014);
- an updated Phase 1 habitat survey (2014);
- further consideration of highways matters, specifically including the most appropriate means of access (2014); and
- an updated view on possible on site drainage issues (2014).

This work has resulted in a series of plans which record relevant information, including topography, surrounding uses, connectivity, landscape designations and committed development in the local area. A review of the relevant Planning Policy framework has been conducted, including the draft Torbay Local Plan.

The baseline studies have identified that the site provides opportunities to deliver a comprehensive and natural addition to the existing, approved White Rock 1 Urban Extension which together would provide a sustainable location for the growth of Paignton.

To further develop the baseline studies, Stride Treglown's Masterplanning and Urban Design team have analysed the opportunities and constraints of the site. These, along with the results of the baseline studies have informed the preparation of site specific Development Concepts from which a series of emerging development options have been prepared. This work has concluded with the presentation of an emerging Preferred Development Option.

We consider that the site offers opportunities for residential and employment development within an attractive landscape setting. Furthermore, a combination of on and off-site strategic landscaping and woodland planting will build upon proposals in the locality, committed as part of the White Rock scheme to the north. This would address the need for landscape screening of the development whilst providing opportunities for ecological mitigation and enhancement. Furthermore, strategically designed landscaping will provide positive opportunities for improved countryside access, from both within the site and for the existing settlement.

Finally, with regard to delivery, the land is under a single joint venture ownership, the same which has developed proposals at White Rock involving a constructive consultation process and to a point where the first phase of construction is expected later this year.

In relation to the potential deliverability of the White Rock extension land covered by this submission, this can be made available, and subject to the necessary approvals, could come forward within 5-7 years.

1 | Introduction

This study promotes the White Rock 2 site as a natural extension of the development already approved to the north.

The study presents the baseline/evidence base for the site, including a review and analysis of the Planning Policy framework and the consideration of key issues, including highways, ecology and potential landscape impact.

Building on the established baseline, the study considers design parameters, including opportunities and constraints, before presenting a preferred option Development Concept.

The site is identified by Torbay Council in its draft Local Plan, the 'Torbay Local Plan, A Landscape for Success', as having the potential to meet identified requirements for homes and jobs. The draft Local Plan has identified:

- The Brixham Road corridor as a growth area;
- The need to provide new employment floor space and jobs in the area, including land at White Rock;
- That the White Rock area has the capacity to provide between 270 and 500 new homes; and
- That a local centre is needed in the area.

The site lies on the western edge of Paignton, adjacent to the Brixham Road and is located wholly within the Unitary authority of Torbay Council with South Hams District Council on its western boundary.

The study area extends over land currently in agricultural use to the south of White Rock Knoll and to the west of the Brixham Road. The extent of the study area is approximately 31ha.

Figures 1 and 2 show the location of the site. The area proposed for development lies to the immediate west of the A3022 Brixham Road and the community of Goodrington on the western edge of Paignton.

It lies adjacent to the White Rock urban extension area that lies to the south of Long Road. This development includes employment land, a local centre and 350 residential dwellings along with public open space and sports provision. The village of Waddeton lies to the south west of the site and the village of Galmpton to the south.



Fig. 1 Site Location Plan



Fig. 2 Aerial

2 | Planning Context

This section briefly considers the planning history of the site, including reference to the scheme at White Rock 1.

Following this there is a review of the planning policy context within which development could take place; this considers National and Local level policy, including the emerging new Local Plan.

Planning History

At the 1989 Torbay Local Plan Inquiry much of Deeley Freed's land interest, including the subject site was considered, but eventually rejected at that time, as a potential housing and employment allocation.

Planning applications covering part of the study site were submitted in 1995 and 1996 for new housing and open space, including the realignment of Brixham Road (Refs 95/0998/OA and 96/1288/OA). The earlier of the two applications was refused planning permission in October 1995. The latter application was withdrawn in June 1998. In summary, the reasons for refusal of the first application related to insufficient need at that time, adverse landscape impact and transportation impact.

In October 1995 an outline planning application which extended to cover a large part (but not all) of the subject site (ref. 1995/1304/OA) proposed the erection of units for employment purposes within classes B1, B2 and B8 (although B8 uses were subsequently withdrawn). In June 1996 Torbay Borough Council resolved to grant outline planning permission subject to agreeing a S106 Agreement and reductions in the development area. In July 1996 the Secretary of State called in the application and in July 1997 determined to refuse permission.

The Inspector, acting for the Secretary of State, identified that public views of the development area are available close to the site from Brixham Road where there are extensive views across to the Dart Valley, from the higher points of the Hookhills Estate, and from Waddeton Road and Long Road. He also identified that the southern part of the site is visible from several public vantage points further afield, particularly from the higher land to the south. These include Galmpton Common (0.7 km away), Alston Reservoir, Churston Lane (2.3 km away) and the public footpath to Higher Greenaway (2.5 km away).

The Inspector noted that from the higher ground on the far side of the River Dart, at a distance of about 4 km, the southern development area could be seen against the backdrop of housing in Paignton, with the 'Nortel' building to the west and Torbay to the east. Important vantage points were identified as Fire Beacon Hill and the higher ground above Dittisham and Cornworthy.

The Inspector considered that the suitability of the site for the proposed development, particularly in terms of its visual impact on the surrounding area, was a prime consideration. He accepted that national, strategic and local planning policies do not rule out all development near Areas of Outstanding Natural Beauty (AONB) and within Areas of Great Landscape Value (AGLV). He considered the key question to be whether the development would harm the special landscape qualities of these areas and the attractiveness of the area for tourists.

The Inspector considered that it was important to recognise the particular characteristics, function and qualities of this area of landscape and to carefully assess the likely visual impact of the developments.

More recently, a number of planning applications have been submitted to develop land at White Rock, including for a business park (in 2005). This application was made in response to an allocation in the Adopted Torbay Local Plan (2004) for 11.8ha of land for employment use. This application was approved although was not implemented.

In 2010 work commenced to develop a masterplan for the redevelopment of White Rock, incorporating a mix of uses with high quality employment use in the Western Bowl area, housing development in the order of 350 units, associated public open space and a new Local Centre in the east, adjacent to Brixham Road. The masterplan was submitted as part of an application for outline planning permission and was resolved to be granted permission in February 2012. Subsequent to this a number of reserved matters applications were submitted and consent granted in April 2013 along with a signed section 106 agreement.

Within the context of the Secretary of State's 1997 decision, together with the more recent development proposals along Brixham Road, and specifically the White Rock scheme, this current Land Promotion Study has given detailed consideration to the issues raised, particularly the potential for landscape impacts.

Details of potential landscape impacts, the constraints this imposes and the resultant design response are set out in later chapters.

Planning Policy Context

National Planning Policy Framework

The National Planning Policy Framework (NPPF) was introduced in March 2012 and replaced the majority of existing national planning policy contained within Planning Policy Statements (PPS) and Guidance (PPG). The general aim of the introduction of the NPPF was to provide a consolidated and streamlined document of national policies. Since its introduction, Government have also revised and updated accompanying guidance notes in the form of Planning Practice Guidance and provided access to this on a dedicated website as part of the Planning Portal.

At its heart, the NPPF seeks to promote sustainable development and adopted the definition adopted in the Brundtland Report (1987), namely that sustainable development should meet the needs of the present without compromising the ability of future generations to meet their

own needs. The NPPF (paragraph 7) establishes three dimensions of sustainable development – economic, social and environmental and establishes a role for each of these as part of the planning system.

Whilst reiterating that planning law establishes that applications for planning permission must be determined in accordance with the development plan (paragraph 11), and that the NPPF does not change this principle, it does introduce the concept of presumption in favour of sustainable development.

For decision making, this requires the approval of applications which accord with the development plan. Where the development plan is silent, permission should be granted, unless adverse impacts of doing so would significantly and demonstrably outweigh the benefits or specific policies within the NPPF indicate that development should be restricted (paragraph 14).

For plan making, the principle means that local authorities should positively seek opportunities to meet the development needs of their area. Furthermore, Local Plans should meet objectively assessed needs and ensure they have sufficient flexibility to adapt to rapid changes (paragraph 14).

Finally, paragraph 17 of the NPPF identifies 12 core land-use planning principles which should underpin plan-making and decision-making. From a Local Plan perspective, these include, but are not limited to:

- Planning should be genuinely plan-led and empower local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area;
- Be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
- Proactively drive and support sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs;
- Seek high quality design and take account of the different roles and character of different areas;
- Conserve and enhance the natural environment; and

- Promote mixed use developments.

In addition to these high level principles, the NPPF provides further policy guidance on a range of matters, including housing, economic development, including the vitality of town centres, good design and healthy communities.

Local Plan

At the time of writing, the adopted Local Plan for Torbay is the Torbay Local Plan 1995 – 2011 (adopted 2004). The Council are currently at an advanced stage in updating this plan having published for consultation and subsequently submitted a new Torbay Local Plan – ‘A Landscape for Success: The Plan for Torbay 2012 to 2032 and beyond’, referred to hereafter as ‘the Draft Plan’.

The Adopted Local Plan

The Torbay Local Plan was adopted in April 2004 and covers the period 1995-2011. Whilst the plan designated an element of the White Rock 1 site as initially suitable for employment use (this was of course developed further in the course of the White Rock Masterplan process and subsequent outline planning application), the plan is silent on the White Rock 2 land area.

Housing

Policy HS (Housing Strategy) states that a sustainable housing strategy will be promoted which aims to meet Torbay’s housing requirements through:

- giving everyone the opportunity of a decent home and promote social cohesion;
- providing a mix and choice of housing of a balanced range and size, type and location;
- securing a balance between new housing and the protection of environmental quality and jobs;
- maximising the reuse of urban land and implementing a sequential approach to housing development; and
- generating sustainable patterns of residential development at optimum densities in safe and attractive environments, accessible by a variety of means of transport.

In order to make the best use of urban land, higher density housing is encouraged, where appropriate. However, residential development will also be expected to provide adequate open space.

Policy H9 states that all new residential schemes should demonstrate a high standard of design which take account of the defining characteristics of the existing environment and, where possible, enhance it.

Policy H10 states that new housing schemes should be developed with maximum densities consistent with key environmental objectives. High densities should be developed on urban sites, which have good access to public transport and community facilities. In these circumstances, car parking provision should be reduced. There should be adequate provision of public open space, including play and amenity areas.

Policy H11 states that where appropriate, amenity open space, play areas, wildlife areas and suitable landscaping should be provided in residential developments, to meet the arising needs from the proposal.

Employment

Policy E5 states that the development of a sustainable and competitive business sector in Torbay, comprising office and industrial uses will be sought. This includes securing a balance between economic regeneration and the protection of environmental quality; and new jobs and housing.

Policy E6 states that the change of use or re-development of existing employment land and/or buildings for other uses will only be permitted where there would be no significant effect upon the employment opportunities or the quality and quantity of employment sites in Torbay; or where the proposed uses would be beneficial either because of their sustainable credentials or because they would replace an existing unacceptable use. It should, however, be noted that Torbay Council’s assessment of how policy complies with the NPPF, required because the Plan was adopted prior to its introduction, notes that Policy E6 does not comply. Specifically, there are conflicts with paragraph 22 of the NPPF, which states that “planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable

prospect of a site being used for that purpose”.

Community, Education and Health Facilities

Policy CFS states that the development of new and the regeneration of existing areas as sustainable communities will be permitted where proposals meet the needs of and enhance the quality of life of residents.

Policy CF1 states that new and improved community facilities, such as schools, pre-school play groups, health centres, places of worship, community centres, community sports halls, libraries and the use of schools for community benefit, will be permitted where they would be readily accessible to the local community, would not impact adversely on adjacent properties and would not cause serious congestion or a road safety hazard.

Policy CF6 states that where additional social, physical or environmental infrastructure is needed in order for development to go ahead appropriate contributions will be sought from the developer.

Policy CF7 states that where proposed new development will require a significant increase in or improvement to existing educational provision, appropriate contributions will be sought through planning agreements in accordance with Policy CFS. Contributions will be sought on the basis of demand for educational facilities generated by the development and the level of financial contributions will be sought on the basis of the scale and nature of the educational need.

Accessibility

The local plan promotes a sustainable land use transportation strategy that aims to reduce the environmental impact of transport systems and encourage sustainable alternatives to the private car.

Policy T1 states that new non-residential development will only be permitted where it is possible for more than 50% of the potential users to gain access by foot, cycle or public transport. Developers of larger sites will be expected to prepare and implement a travel plan which will address these conditions. Residential development should be located so that residents have adequate shopping facilities, primary and junior schools, community and healthcare facilities, and other frequently used attractions within easy

and safe walking distance.

Policy T2 states that all new development should promote the most sustainable and environmentally acceptable modes of transport, having regard to the following hierarchy, which prioritises the most sustainable forms of transport:

- walking;
- cycling;
- public transport; and
- private transport.

Policy T25 sets out maximum parking standards which are only to be permitted where there is sufficient justification shown for the full standards to be allocated.

Policy T27 states that all new development should provide appropriate road layouts and should be accessible to service vehicles, taking into account the sites' topography and location.

Landscape

The local plan's landscape strategy states that the landscape setting of Torbay and its coast and settlements will be protected from development which would harm or detract from local character and distinctiveness. Priority is accorded to maintaining the rural landscape surrounding the built up area and the strategic green wedges which lie between the main towns and villages.

Policy L1 states that in designated AONB the conservation and enhancement of their natural beauty will be given priority over other considerations. Within these areas development will only be permitted where it would support their conservation or enhancement or would foster their social and economic wellbeing, provided that such development is compatible with their conservation. Development proposals adjacent to the AONB will only be permitted where they would not damage the natural beauty of the area.

Policy L2 states that development which is likely to affect, directly or indirectly, designated Areas of Great Landscape Value (AGLV) will only be permitted where it will maintain or

enhance the special landscape character of the AGLV.

Policy L10 states that planning applications for major development, particularly of the edge of the existing built areas, will only be permitted where necessary mitigation measures are taken to minimise damage to the landscape. The landscaping measures should form an integral part of the development and reflect the local landscape and distinctiveness.

Nature Conservation

The local plan's nature conservation strategy states that development should preserve or enhance the biodiversity, wildlife and geological value of the terrestrial and marine environment.

Development which would harm, directly or indirectly, a protected species, will only be granted planning permission where there is an over-riding need for the proposed development.

Environmental Protection

Development should respect environmental limits, be implemented in a sustainable manner and, where possible, be accompanied by environmental mitigation.

Policy EP9 states that development will not be permitted which poses an unacceptable risk to the quality and quantity of groundwater, or the quality of controlled waters.

The Emerging Draft Local Plan

The draft Plan was consulted on between 24 February

TORBAY LOCAL PLAN

A landscape for success



The Plan for Torbay - 2012 to 2032 and beyond



Proposed
Submission Plan
February 2014

and 7 April 2014. Since this period, the Council have been considering the submissions received and preparing for the subsequent examination. The plan was submitted for examination on 31st July 2014 and hearings are anticipated in November 2014.

The draft Plan sets out the key issues, aspirations for the future and policy for delivering and managing change in the Torbay area over the next 20 years. These are grouped under 5 main aspirations:

1. Economic recovery and success;
2. A better connected, accessible Torbay;
3. Protect and enhance a superb environment;
4. Respond to climate change; and
5. More sustainable communities and better places.

Policy SDP3 Paignton North and Western Area allows for mixed use development to be brought forward in a number of locations, including White Rock. It specifically requires development to provide a balance between jobs and homes whilst facilitating the provision of transport and other infrastructure and safeguarding biodiversity and landscape character.

From the perspective of Policy SDP3, and specifically SDP3.5 for White Rock, it is clear that the development proposed and approved at White Rock 1 is beginning to contribute to the policy objectives. There is however no distinction between the potential for development at White Rock 1 and White Rock 2 despite the latter clearly being within the SDP3.5 area, as noted on the Key Diagram accompanying the draft Plan.

Stride Treglown made representations to the Proposed Submission Plan on behalf of Abacus/Deeley Freed.

These representations sought to serve the purpose of:

- highlighting deficiencies in the policy approach to housing and employment numbers/allocations, specifically that the numbers are too low to meet the objectively assessed need;

- seeking clarification within the Plan for the role of White Rock, particularly housing delivery rates and the role of the Local Centre; and
- promoting and protecting the opportunity for development on land to the south of White Rock i.e. an associate urban extension at White Rock 2.

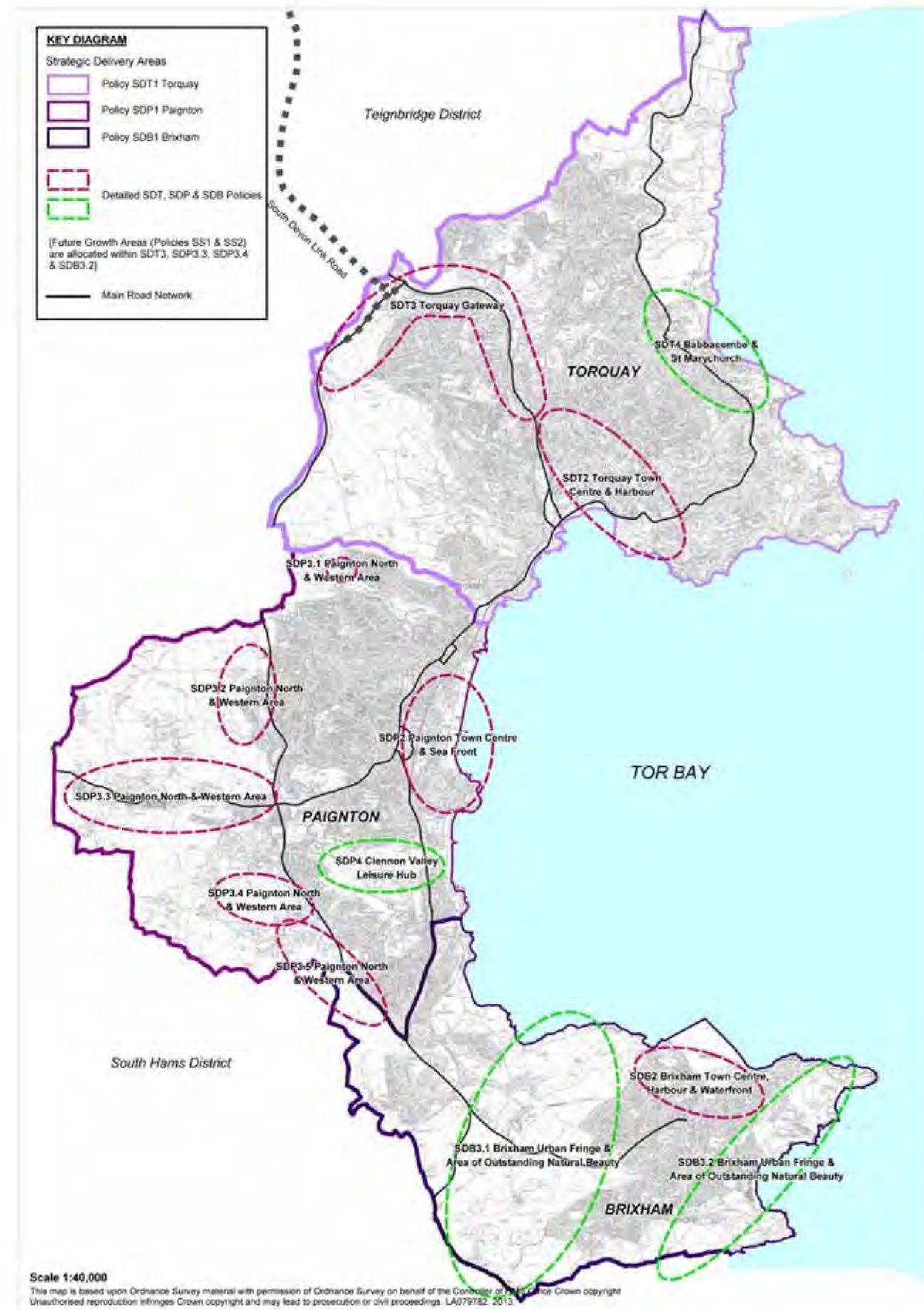
These representations were submitted to Torbay Council as part of their formal consultation on the draft Plan and they are therefore not duplicated in full here. However, the following specific points are considered to be worthy of reiteration within this Baseline Report.

Within the context of Policy SDP3 Paignton North and Western Area, representations made it clear that there is a need within the draft Plan for more clarity on the significant future potential role of White Rock 2 within the western area. Similarly, representations on Policy SDB1 Brixham Peninsula noted that the White Rock 2 site falls partly within the Brixham Neighbourhood Plan area, rather than that of the Paignton Neighbourhood Plan. With this in mind, it was recommended that clarity is introduced to ensure that cross-border development opportunities are recognized and to avoid the risk of disjointed development of the site.

Aligned with a broad call for greater clarity on the future role of land at White Rock 2, representations to Policy TC2 Torbay Retail Hierarchy objected to the exclusion of a Local Centre at White Rock 1. Given the integral role which this element plays in the wider development, explicit reference is sought. Furthermore, whilst a change to the policy wording is not requested, our representation does note that there is significant potential for White Rock as a whole (i.e. phases 1 and 2) to perform at a level above Local Centre with the combined development area serving as a District Centre for the southern and western areas of Paignton.

Our representation in respect of Policy SS9 Green Infrastructure (which also comments on Policy C1 Countryside and the Rural Economy) considers the specific reference to a proposed new Countryside Access and Enhancement Scheme at White Rock (Policy SS9.3).

We note that there are significant opportunities to consider the development at White Rock 2 in conjunction with the existing permission in place for White Rock 1. Specifically,



we see potential in an extended and enhanced scheme. We therefore proposed the removal of the allocation of land under Policy SS9 (namely the White Rock 2 land) for a new Countryside Access and Enhancement Scheme, to be replaced with wording which recognizes the potential of the land to support an extended Countryside Access and Enhancement Scheme but designed for a masterplan led design process.

Torbay Council Response

It is worthwhile to note that whilst the draft Plan as submitted continues to not include land at White Rock 2 as a site allocation, the potential is recognised.

Specifically, in responding to the representations submitted by Stride Treglown, the Council have indicated that they would not object to development, as long as landscape and biodiversity issues can be addressed. It is our view that this indicates that the Council view the site as having a potential future role in the delivery of housing.

These points are recognised as key issues for the site and are thus considered in greater detail later in this Study.

The Local Plan Examination (edit March 2015)

Following the initial public hearings the Council, on direction from the Inspector, proposed and consulted on a number of Main Modifications to the Draft Local Plan, including the proposal to identify land south of White Rock (ie the land the subject of this report) as a Future Growth Area. A separate response to the consultation has been submitted which addresses the modifications.

An earlier draft of this Land Promotion Study was referred to during the hearing sessions but had not previously been supplied to the Inspector. In light of the examination to date, the report has been updated and is now submitted as an examination document in order to contribute to the wider evidence base.

Neighbourhood Plans

The role of Neighbourhood Planning is seen as central to allowing neighbourhoods to develop a shared vision for their neighbourhood and to deliver the specific sustainable development that they need. It allows local people the opportunity to ensure that they get the right types of development for their community.

Neighbourhood Plans should be viewed as complementary to the Local Plan and should be aligned with the strategic needs and priorities of the wider area. It is not appropriate for Neighbourhood Plans to promote less development than set out in the Local Plan, nor should they undermine the strategic policies established in the Local Plan.

Torbay Council

Torbay Council were successful in bidding (2011) to take part in the Neighbourhood Planning Front Runners Scheme to create a Neighbourhood Plan for Brixham. Subsequently, Torquay and Paignton Neighbourhood Forums were successful in bidding to take part in the fifth wave of frontrunners (March 2012). Therefore, within the Torbay area there are three Neighbourhood Plans at varying degrees of preparation:

- Brixham with Churston, Galmpton & Broadsands Neighbourhood Plan (Brixham Peninsular Neighbourhood Plan);
- Paignton Neighbourhood Plan; and
- Torquay Neighbourhood Plan.

With specific regard to White Rock, two of these plans have relevance. For White Rock 1 (the consented mixed use development comprising 350 homes and high quality employment space), the Paignton Neighbourhood Plan is relevant whereas for the proposed development at White Rock 2, the Brixham Neighbourhood Plan has effect. As this report relates solely to the potential for development at White Rock 2, the Brixham Neighbourhood Plan is the sole relevant plan.

The Plan seeks to address the needs of four areas. An early draft Plan was produced in April 2014 and made available on the Brixham Neighbourhood Plan website for comments. At the time of writing it is not clear what timetable the group are following although the minutes of their most recent meeting (held 25th June 2014) note that consultation is ongoing and that a discussion was held on how to continue to promote the plan. An initial review of the draft plan notes that there are no references to land at White Rock 2. This is in part considered to be a consequence of the plan boundaries

for the Paignton and Brixham areas having been drawn effectively along the boundary between the White Rock 1 and 2 development areas and the focus therefore being on the southern area rather than the southern/western edge of Paignton.

As noted above, Stride Treglown submitted representations to the draft Torbay Local Plan. Our representations on Policy SS5 Employment Space notes, amongst other matters, that it is inappropriate to place the onus on Neighbourhood Plans to support the Economic Strategy embedded within the draft Local Plan. This position is based on the fact that the Council are not in a position to guarantee the progress of Neighbourhood Plans and therefore such plans should not be left to deliver core planning principles. The same point is made in a representation on Policy SS9 Green Infrastructure.

It is considered that the position taken in the above referenced representations is reinforced by the fact that there are no references to potential development at White Rock 2, despite the fact that it is clearly identified within the draft Local Plan Policy SDP3 Paignton North and Western Area (sub policy SDP3.5 White Rock). This is considered to represent a significant deficiency in the effectiveness of the draft Neighbourhood Plan and would suggest that the Plan, if progressed without reference to White Rock 2, would be ineffective in supporting the strategic aims and needs of the Local Plan.

South Hams District Council

The South Hams District Council boundary abuts the western boundary of the site. Within this area, the relevant parish is Stoke Gabriel Parish Council. Initial research confirms that there has been no application by the Parish to prepare a Neighbourhood Plan. This situation will be monitored in order to ensure that any future plan has regard to the emerging plans for White Rock 2.

Key Policy

The following policies of the emerging Local Plan are of particular relevance to the White Rock 2 site:

- The site is included within the Strategic Delivery Area established under Policy SDP3 (sub-policy 3.5) Paignton North and Western Area;
- Policy G1 Countryside and the Rural Economy promotes access to the countryside and provides a steer to encourage positive placemaking within the site; and
- Following revisions to the policy, made in response to Preferred Options Consultation Representations, White Rock is established as a Local Centre within Policy TC2 Torbay Retail Hierarchy.

3 | Site Baseline

We have undertaken a number of assessments in order to establish the site baseline.

This draws upon information previously gathered and submitted to Torbay Council as part of the April 2012 Land Promotion Submission for the site.

The Site Baseline includes the following:

- Site Background, including:
 - Site location
 - Planning Commitments
 - Land Uses
 - Distribution of Community Facilities
 - Archaeology
- Landscape and Visual Impact Study, including:
 - Topography
 - Public Rights of Way
 - Landscape Designations
 - Landscape Character
 - Visual Assessment
- Highways
- Drainage
- Ecology

3.1 Site Background

Site location

The White Rock 2 site is located within the Torbay Council area, on the western edge of Paignton.

The site is adjacent to the existing White Rock urban extension area, itself located south of Long Road and west of Brixham Road.

The northern site has outline planning permission for a mixed used urban extension, full details of which are noted below.



Fig. 3 Site Location Plan

Planning Commitments

The site forms a logical extension of development along the western side of Brixham Road, linked to the adjacent residential community of Goodrington to the east and adjacent services, facilities and significant levels of employment land.

The site is located immediately adjacent and adjoining the White Rock urban extension area to the north, for which outline planning permission has been granted for a mixed use development including 36,800m² of employment uses, a local centre and 350 residential dwellings alongside other uses and public open space and sports provision (ref: P2011/0197).

Work to implement this permission has commenced with Linden Homes having secured full planning permission for an initial phase of residential development on land within the eastern part of the site.

Immediately north of White Rock is the existing employment land of Torbay Business Park/Westfield Business Park and further north still, the Yalberton Industrial Estate.

The potential development of the subject site would therefore continue the historic development southwards along Brixham Road whilst reinforcing and integrating previous designations and commitments to the north with the existing adjacent residential communities in Goodrington and White Rock.

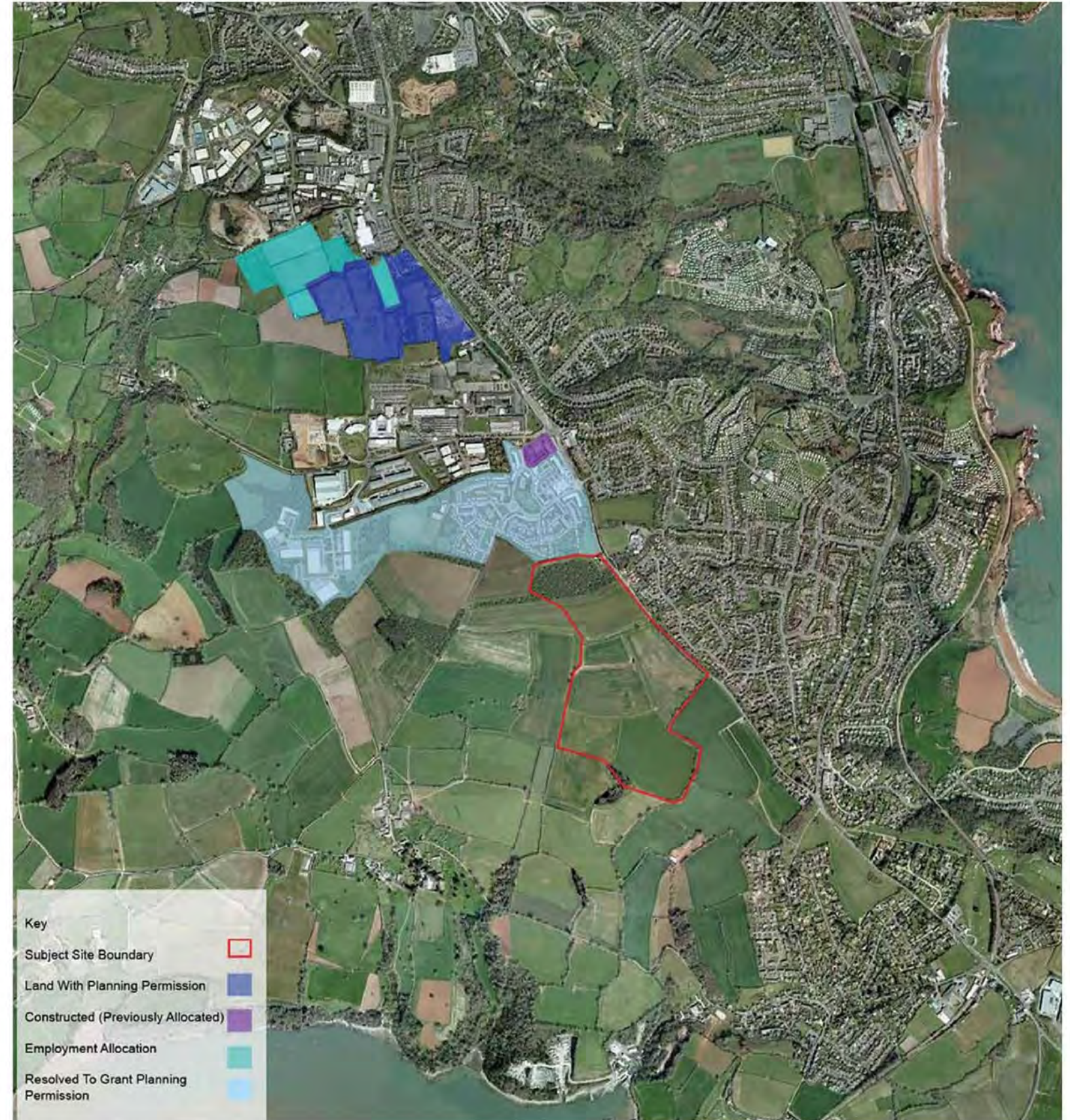


Fig. 4 Planning Commitments

Land Uses

The adjacent land use plan illustrates the subject site's location relative to nearby employment and residential uses, public open space and other uses.

The allocation and development of the subject site for a new community comprising residential and employment uses alongside a care home village would provide strong integration with three key surrounding land uses – firstly, the employment developments, local centre and public open space to the north, secondly, the existing community at Goodrington to the east of Brixham Road and thirdly, the recreational opportunities related to the open countryside to the west and south of the site.

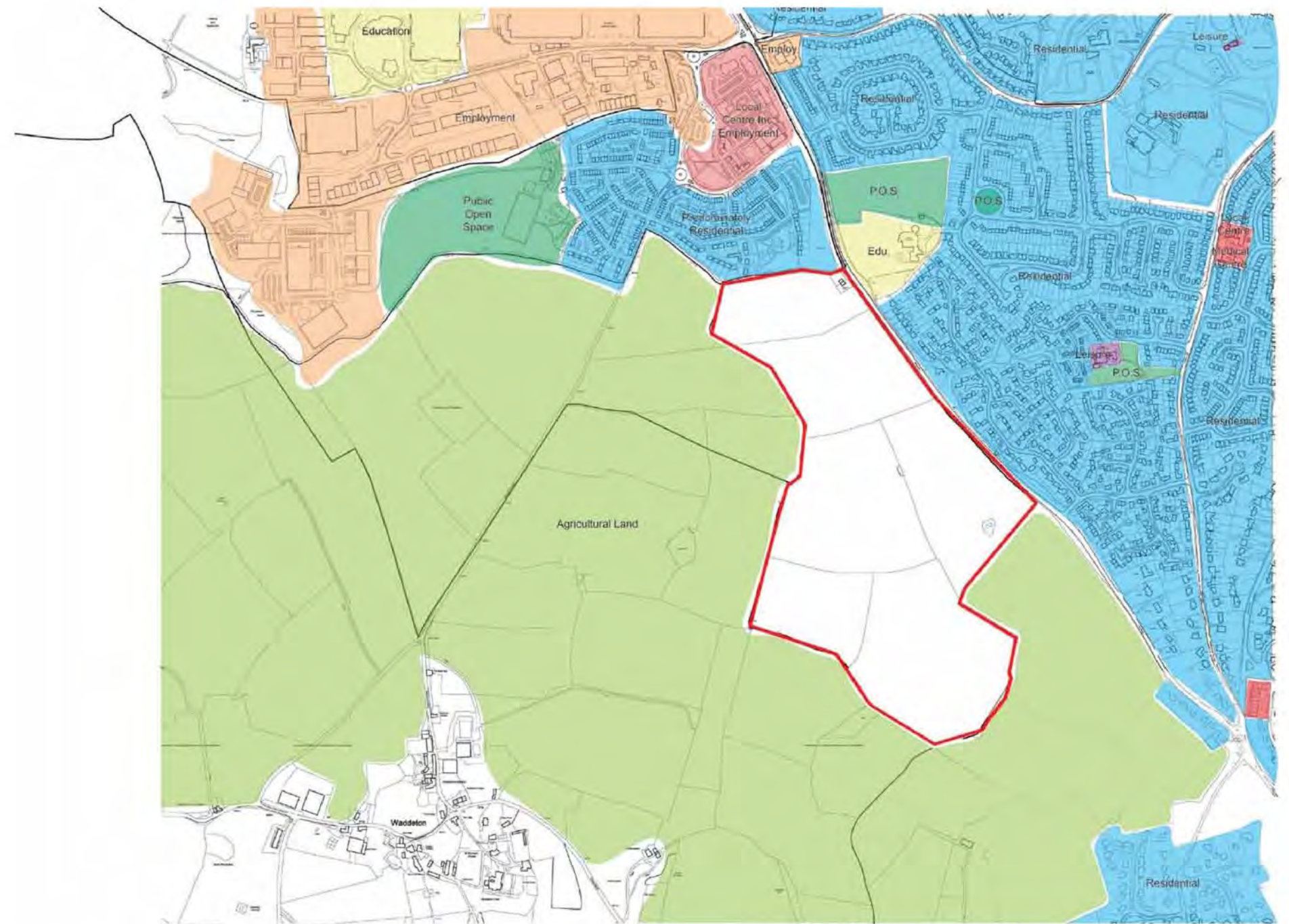


Fig. 5 Land Uses

Distribution of Community Facilities

The location of the site adjacent to the existing residential communities of Goodrington and White Rock offers a wide range of services and facilities within a close radius of the subject site, as shown on the adjacent plan.

Within approximately 900 metres of the centre of the site there is a local centre and other associated local amenities, a medical centre, primary school and community centre.

Stride Treglown are currently engaged to prepare and promote plans for phased works at the nearby White Rock Primary School. Planning permission was granted on 24 October 2014 for an additional two storey classroom block and dining room extension together with a combined cycle and pedestrian route.

On completion of the full package of works, anticipated by September 2016, the school will have a 3 form/630 pupil capacity. This expansion is in large part driven by the need to ensure sufficient capacity to meet the needs of the Paignton North and West Strategic Delivery Area.

The plan shows that extending the radius from the site slightly further there are significant numbers of other community facilities within the established urban areas of Yalberton and Goodrington and as a result of new developments directly to the north of the site at White Rock and Torbay Business Park.

Key - New Residential Development			
Healthcare	Local Amenities	Education	Leisure Facilities
1 Cherry Brook Medical Centre	1 White Rock Local Centre	1 Whiterock Primary School	1 Paignton Zoo & Botanical
Retail	2 Kingsway Avenue	2 Roselands Primary School	2 Torbay Leisure Centre
1 Sainsburys	3 Goodrington Road	3 South Devon College	3 Splashdown Water Park Quaywest
2 Morrisons	4 Roselands Park	4 Paignton Community College	4 Hookhills and Broadsands Community Centre
3 Yalberton Retail Park	5 Cherry Brook		
White Rock 2 Centre Point	6 Three Beaches		
	7 Churston Broadway		

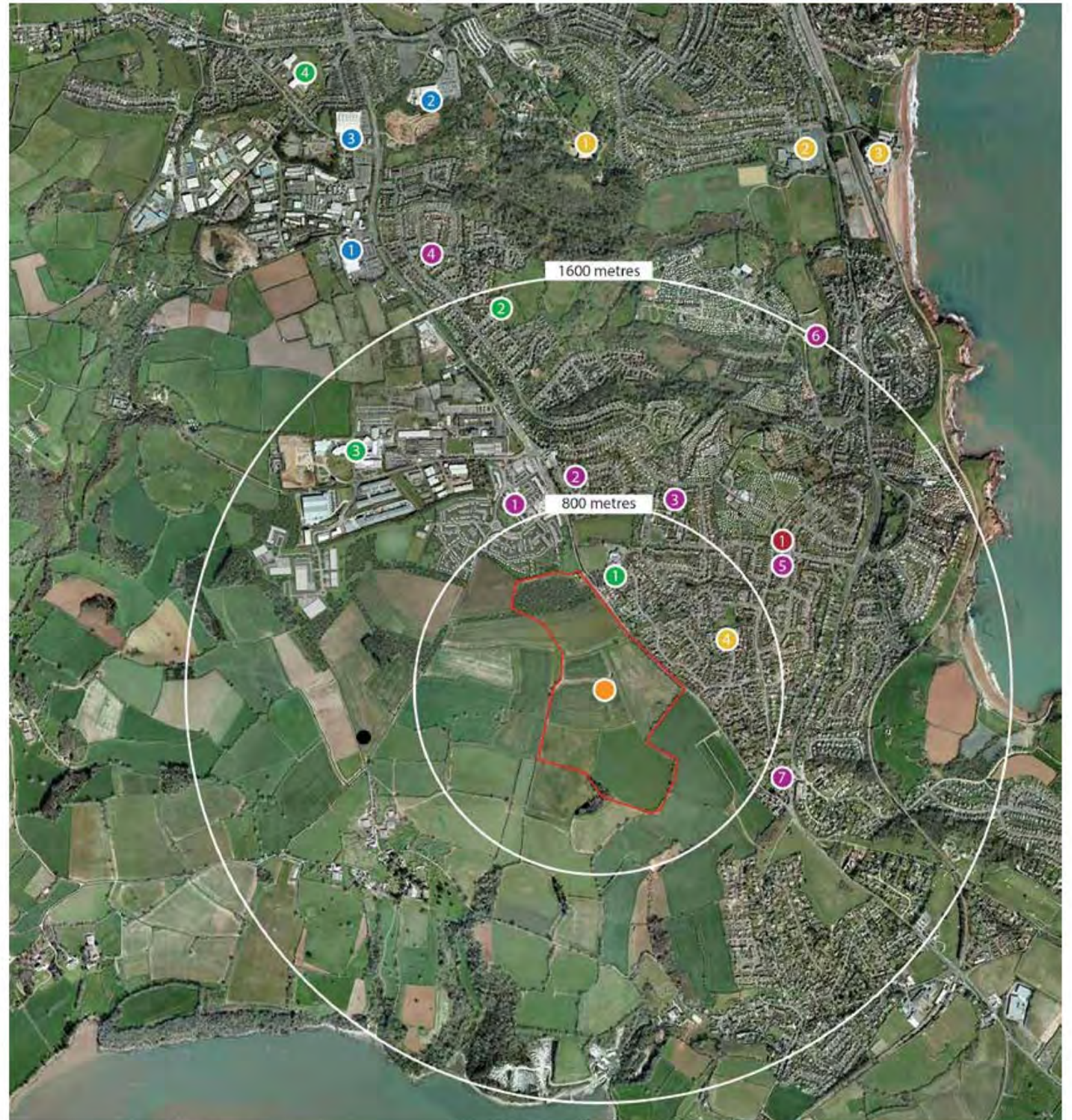


Fig. 6 Distribution of Community Facilities

Archaeology

The spread of archaeological finds in and around the site area is illustrated on the adjacent plan.

The finds relate to a study carried out by Exeter Archaeology for the 2004 Environmental Impact Assessment for Long Road South Business Park application (ref: P/2004/1621).

The plan illustrates that the only finds on the site were close to its northern boundary and related to flints found in 1996 and a former quarry.

This current submission proposes no new buildings in the immediate vicinity of these previous finds – it is instead proposed that a band of woodland would be located across the north of the site.

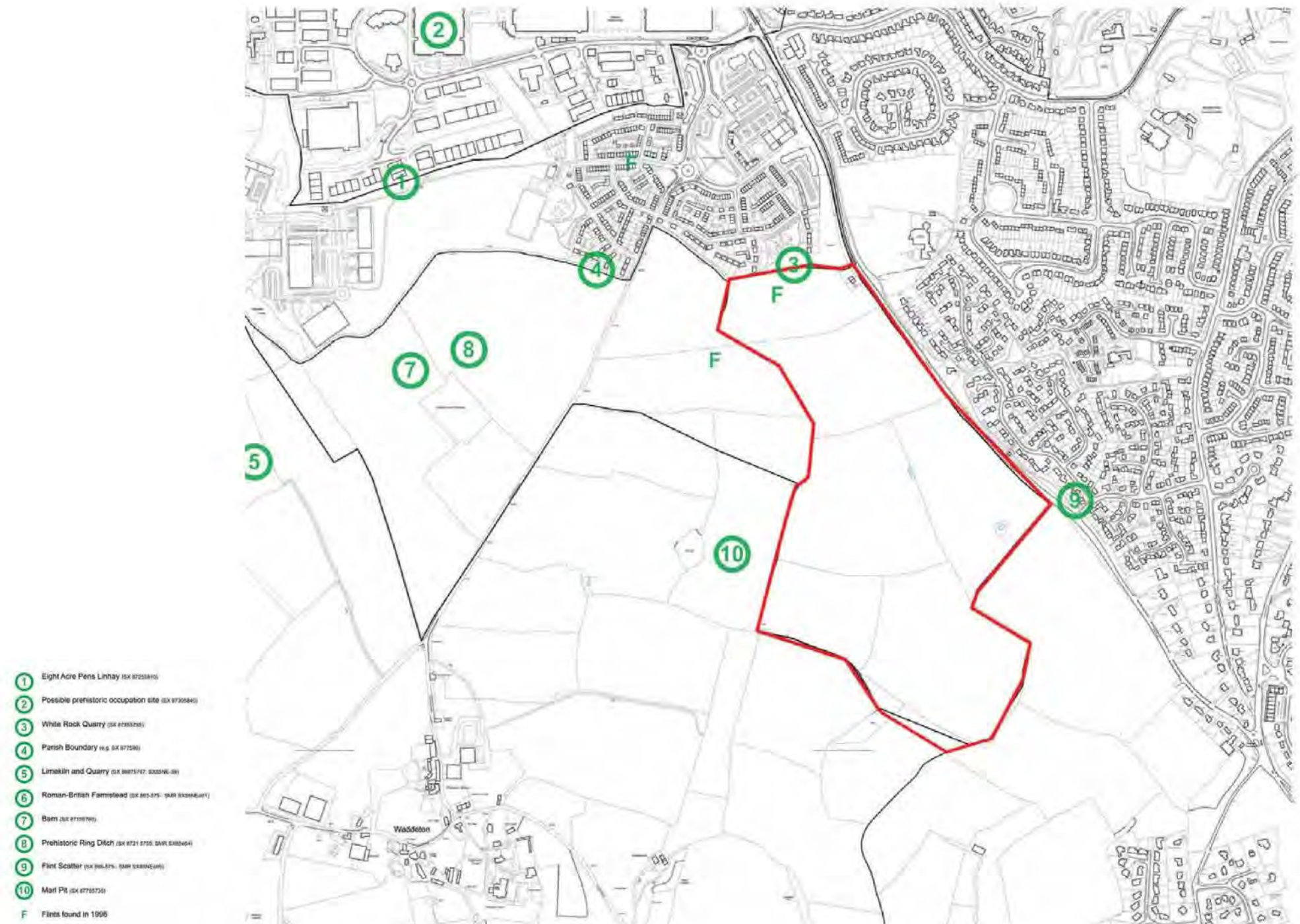


Fig. 7 Result of Archaeological Survey

3.2 Visual Assessment and Landscape Analysis

In June 2014 Stride Treglown carried out a standalone Visual Assessment for the White Rock 2 land.

The assessment considered the proposal for extension of the existing approved development at White Rock, namely White Rock 2, the subject of this report.

The report had two main aims. Firstly, to identify the potential visual impacts of the development proposals and, secondly, to inform the design strategy for the site. These aims are a direct result of the requirement to ensure that the 1997 Secretary of State decision is given due consideration, within the context of the time which has passed since then and the development of land along Brixham Road, including at White Rock 1.

The report is not a full Landscape and Visual Impact Assessment although the viewpoints chosen are similar to those used in a previous LVIA prepared for the consented development at White Rock 1. The details of the report are reproduced here in their entirety in order to set the Landscape context for the development.

Site Description

Land use and existing vegetation

Figure 3 shows a sketch of the existing land use and vegetation. This shows that the site comprises a mix of mainly intensively managed arable fields with semi-improved cattle grazed pasture fields divided by managed hedgerows/Devon hedgebanks with occasional trees within these hedgerows.

Two cottages known as White Rock cottages lie within the site on its northeastern corner. These have gardens with a variety of shrubs and trees within them.

There is a small pond (10m diameter) surrounded by willow, ash and bramble within the south eastern section of the site and another smaller one also with a willow tree within the central north-south hedgerow. No power or telegraph lines or poles traverse the site although they run alongside the eastern boundary with the Brixham Road and along the north western boundary.

Within the central part of the southern boundary of the site, lies part of an existing small plantation known as Nords. This contains pine, larch, spruce, sycamore and ash trees and forms the most noticeable tree group within the site. As part of the off-site planting commitment of the approved development at White Rock the majority of the northernmost field is to be planted with woodland, and this is shown in the aerial photograph at Figure 2 as a tree planted area.

Existing boundary vegetation

As Figures 2 and 3 show, the boundaries of the site are mainly defined by well trimmed Devon hedgebanks that vary in their diversity and herbaceous vegetation. There are a few individual trees within the hedgerows and these are mostly ash and sycamore. The northern half of the western boundary is not defined by a hedgerow as this follows the boundary of the local authority instead of an existing field boundary.

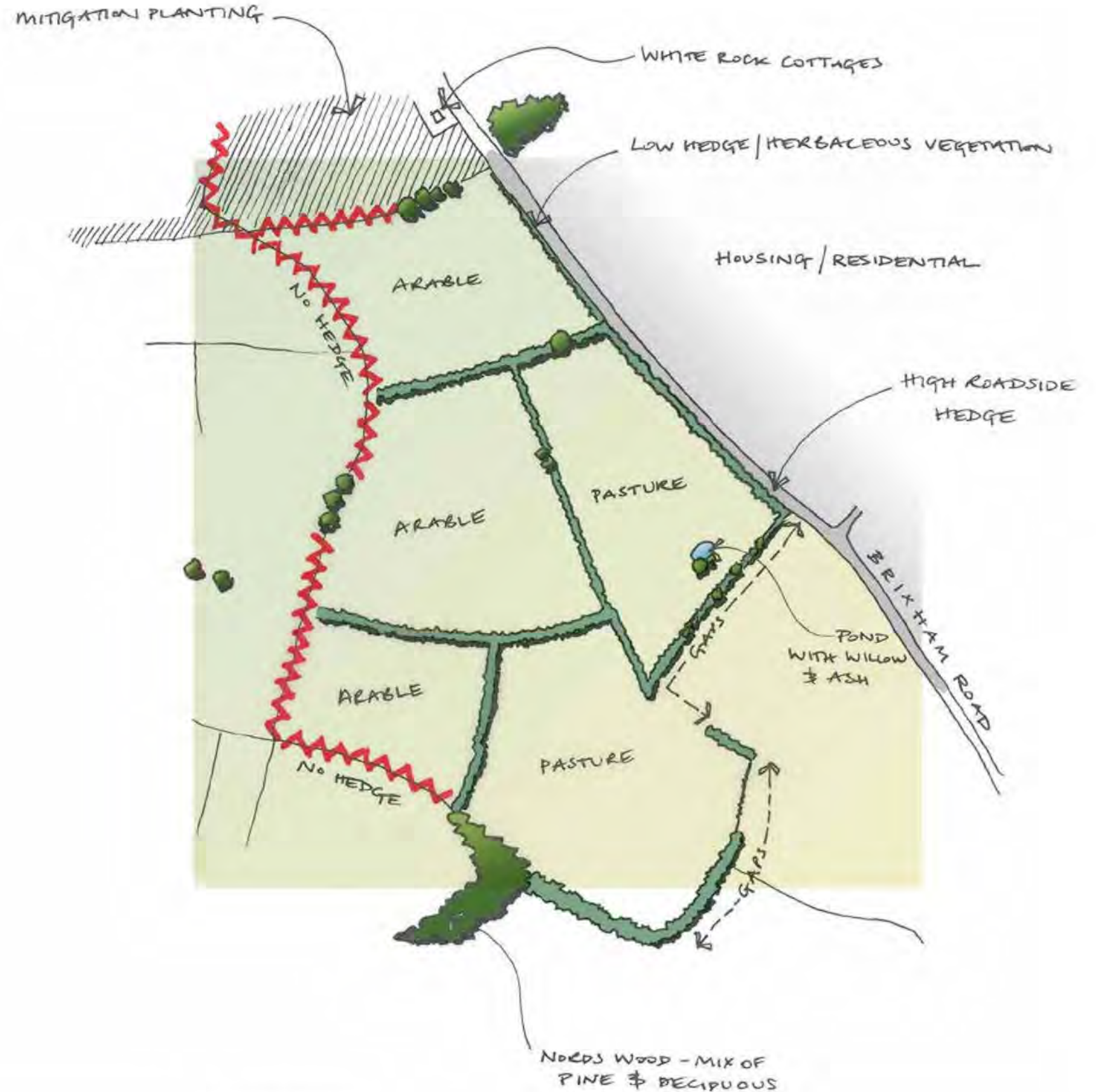


Fig. 8 Existing Vegetation

Topography

Figure 4 shows the site and surrounding topography.

The site topography is undulating and ranges from the highest point at 82m on the northern boundary of the site to the lowest at 60m. The majority of the site lies between 70 and 60m.



Fig. 9 Topography

Public Rights of Way

Figure 5 shows that there are no Public Rights of Way (PRoW) either within the site or around its edges.

The land in the immediate area does not have many footpaths and the nearest public right of way is the Greenway Walk to the south of the site in Galmpton.

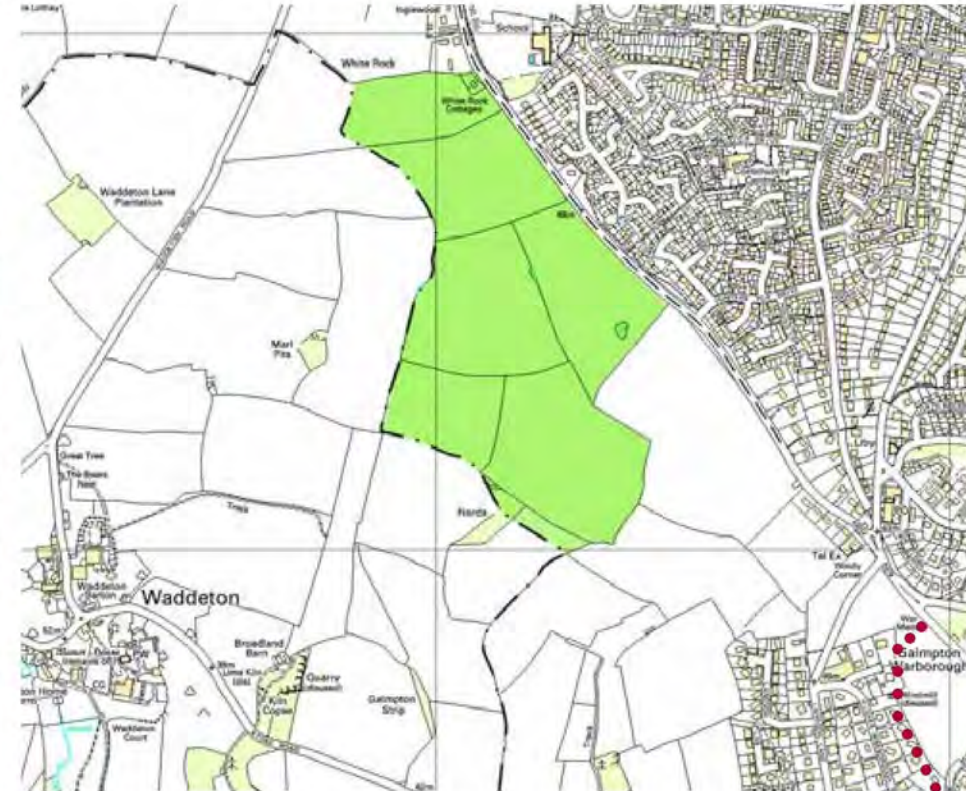


Fig. 10 Public Rights of Way

Existing PRoW

Landscape Designations

Figure 6 shows that the site lies within an Area of Great Landscape Value and 'countryside zone.'

The boundary of the South Devon Area of Outstanding Natural Beauty (AONB) lies approximately 600m to the southwest at its nearest boundary on the Stoke Gabriel road. The AONB encompasses the Dart river valley, the hills that are visible from the site and coastal areas around the built up area of Brixham.

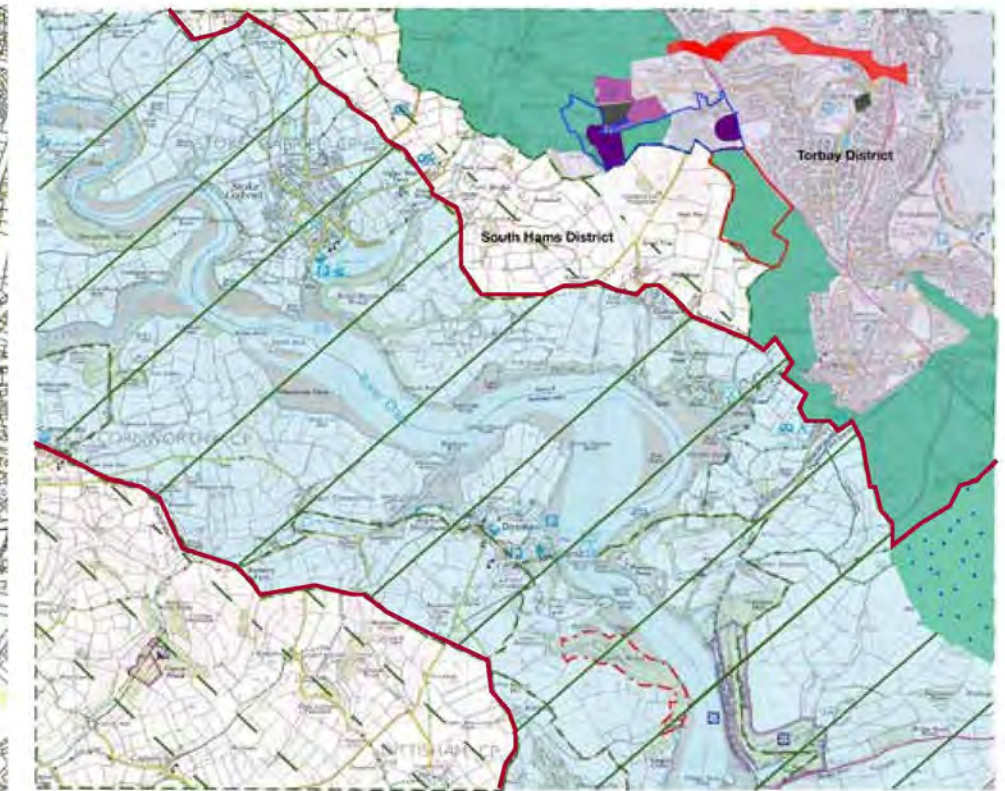


Fig. 11 Landscape Designations

Key

- Country Side Zone and Area of Great Landscape Value
- Area of Outstanding Natural Beauty
- Employment Development Site Including Strategic Landscaping For Employment Areas
- Wildlife Corridor
- Land With Planning Permission For Employment Or Industry
- Coastal Preservation Area
- Site Of Special Scientific Interest
- Dart Valley Trail
- Site Location
- Existing White Rock Commitment
- Coastal Preservation Area and Countryside Zone

Landscape Character

Hierarchy of Landscape Character Areas and Types
National Character Area (Natural England – NE336, July 2012) 151: South Devon
County (Devon Landscape Character Assessment, 2011) Teignbridge and East Devon Area Torbay Hinterland
Devon Landscape Character Type (DCC, Jan 2012) 3B: Lower rolling farmland and settled valley slopes
District - Torbay (Enderby Associates 2010) Area of Local Character Type 1: Rolling Farmland – 10 North Galmpton

National Character Area

The site falls within the National Character Area 151 for South Devon.

The key landscape characteristics of this area that are relevant to the site are highlighted below:

- Arable and pasture fields, with larger fields on the higher flatter land and a more intact, smaller irregular field pattern on the valley flanks. When ploughed the characteristic red soils add to the pattern of the landscape.
- Wildflower rich, often treeless, hedgerows providing field boundaries and borders to the typical narrow sunken lanes linking scattered farmsteads and hamlets.
- Rounded hills without strong patterns, separated by steep intricate wooded valleys with fast flowing rivers.
- Rias, or drowned river valleys, with large expanses of tidal water and mudflats extending far inland. The rias are often steep-sided, with broadleaved woodland down to the tidal edge.
- Villages and towns generally in sheltered valley locations or at the heads of rias, with the larger urban settlements located at either end of the coastal stretch. Rural buildings of local stone and slate, with some cob and thatch.

The new NCA documents include a section on the landscape opportunities that exist within the NCA. The following stated opportunity and examples of how to achieve it is included below as it is particularly relevant to the site:

- 'Use and enhance the existing strong landscape framework that forms the context to the major settlements of Plymouth, Torbay and Newton Abbot in planning high quality growth within a green infrastructure network delivering multiple benefits'
- Creating new accessible, natural greenspaces and links to help integrate new areas of development around Torbay. Provide a range of natural and cultural benefits through the implementation of the Torbay Green Infrastructure Delivery Plan.
- Using the traditional character of the nationally recognised natural beauty of the South Devon AONB as a foundation for new development.
- Promoting the use of sustainable and locally sourced materials and the integration of renewable energy technologies as part of new low-carbon developments.
- Ensuring contact and access to nature and open spaces providing local opportunities for education, play, exercise and quiet enjoyment.
- Supporting sustainable transport connections to major existing visitor attractions, notably around Torbay (the 'English Riviera').
- Developing and improving the network of public rights of way and promoting open access land that provides more opportunities for informal recreation, access to nature and public enjoyment.

(edited version from Page 16 of NCA 151 South Devon)

Devon County Landscape Character Area

The site falls within the Devon Landscape Character Area within the Teignbridge and East Devon area known as the Torbay Hinterland which is Zone 60 in the Devon Green Infrastructure Strategy. The site and its surroundings has many of the characteristics that are typical of this area and they are reproduced below:

- Steeply undulating landform of intricate hills incised by small streams.
- Presence of underlying sandstone geology visible as red soils in occasional ploughed arable fields.
- Extensive views from hilltops to Torbay and the coast, across the Aller valley and rolling farmland and across the Dart valley towards Dartmoor.
- Occasional small mixed and broadleaved woods and orchards on steep slopes, together with hedgerow trees and hilltop pines, giving this landscape a relatively well-wooded appearance.
- Mainly pasture, with patches of arable land.
- Small- to medium-sized, irregular fields divided by mature hedgerows with trees.
- Nature conservation interest that includes broadleaved and mixed woodland, stream courses, wetlands and spring habitats.
- Historic landscape features including castles, remnant medieval field pattern, ancient hedgerows, old orchards and vernacular buildings as well as winding, narrow lanes and greenways.
- Sparse settlement pattern of scattered houses, farms and hamlets with stone or render and slate vernacular buildings and some brick.
- Sense of tranquillity despite proximity of urban areas and major road and railway, by virtue of the steep, intricate landform.
- Major power lines across the hills; and A380 crossing the landscape on the fringes of Torbay.

(http://www.devon.gov.uk/index/environmentplanning/natural_environment/landscape/devon-character-areas/dca-teignbridge)

The pressures on this LCA are described and the following are selected as relevant to the site:

Past and Current

- Major power lines and the A380 Torbay ring road impinge on the area.
- Tranquillity disturbed locally near the main road and railway, adjacent to the urban edge and where night light spill is significant.
- Masts on ridges and hills e.g. Beacon Hill, Borrow Down and Windmill Hill, which break the rural skyline that forms the setting to the coastal resorts.
- Spread of conurbation and associated industrial development onto the more exposed slopes e.g. around Long Road at Kemmings Hill, Linhay.

Future

- Potential road improvements and roadside developments along the A380, leading to an erosion of rural character.
- Expansion of Torbay urban area eroding the rural landscape setting.

The following protection strategies are highlighted:

- Protect the local vernacular – any new development should utilise the traditional materials and styles wherever possible (whilst seeking to incorporate sustainable and low carbon construction and design).
- Protect the landscape setting of Torbay, ensuring new development enhances features such as hedgerows and woodland.
- Protect the higher levels of tranquillity and rural character of the land to the west through the control and management of development, including highways and recreational development.

And the following planning strategies:

- Plan for a network of green spaces and green infrastructure links to support existing populations whilst integrating any new development, particularly in the immediate hinterland landscape to Torbay.
- Restore and manage traditional orchards and explore opportunities for the creation of new ones, including community orchards to promote local food and drink production.

County Landscape Character Type

The site falls within a Devon wide Landscape Character Type (LCT) known as 3B: Lower rolling farmed and settled valley slopes. This was published in January 2012 and divides the Devon landscape into 37 different types. The South Devon AONB and South Hams Landscape Character Assessment 2007 places the area on the boundary of the site within the same LCT – that is lower rolling farmland and settled slopes.

The key landscape characteristics of the 3B LCT are listed as follows:

- Gently rolling lower valley slopes.
- Pastoral farmland, with a wooded appearance.
- Variable field patterns and sizes with either wide, low boundaries and irregular patterns or small fields with medium to tall boundaries and a regular pattern.
- Many hedgerow trees, copses and streamside tree rows.
- Settled, with varied settlement size, building ages and styles, sometimes with unity of materials in places through use of stone.
- Presence of leisure-related development often associated with coast.
- Winding, often narrow sunken lanes with very tall earth banks. Main roads may dominate locally.
- Streams and ditches.
- Some parts tranquil and intimate all year round, except near main transport routes.
- Enclosed and sheltered landscape and wider views often restricted by vegetation.

Local Landscape Character Area

The Torbay Character Assessment completed in 2010 by Enderby Associates assigns the land within the site to the Area of Local Character known as 1O. This is within Type 1: Rolling Farmland which includes hilltops as well as upper and lower slopes and merges the Devon types 3A & B.

The Rolling Farmland character type is what many people associate with Devon and has the following key characteristics:

- The rolling topography which is the key defining feature of this landscape, where subtle changes in slope and gradient occur constantly, without a strong pattern. Flat land is uncommon and generally located on the hill tops.
- A rolling well farmed landscape with an irregular pattern of field boundaries and occasional hilltop woodland.
- A network of sunken lanes with tall hedge-banks and trees cross the area, and occasionally allow wider views across this landscape.
- An irregular patchwork of arable and pasture land with the distinctive red soils visible in autumn and winter.
- Thinly populated, with nucleated hamlets or farmsteads dispersed throughout the area.

Area of Local Character: 10 North Galmpton

Pages 40 and 41 of the Enderby report give a detailed description of the North Galmpton area. The extract from this report is included in Appendix 1 and the main points are highlighted below:

- The land north of Galmpton consists of very gently undulating predominantly pasture farmland, with some arable fields in the northern part extending west from the A380 Brixham Road towards the Torbay boundary west of Goodrington.
- The land slopes broadly westwards towards the River Dart estuary within South Hams and the South Devon AONB.
- Much of the area is relatively open farmland and the northern part is more open and this allows long distance views to the south west to hills beyond the Dart within the AONB, whilst the southern part of the area is screened from the west by a combination of a slight ridge and field boundaries; a field north of Galmpton is used for a car boot sale.
- Field boundaries are low hedges/hedgebanks with occasional hedgerow trees.
- The existing urban edge at Goodrington, abutting the road on the eastern boundary of this area is quite well integrated by mature trees and hedges along the road and within adjoining detached properties although the traffic is visible and audible.
- There are no public rights of way across this area.

The following table shows the landscape and visual sensitivity assessment of the area.

North Galmpton AoLC – Sensitivity Assessment	
Landscape Quality/Condition	
Integrity of landscape character	Moderate/medium but low in the arable northern section of the AoLC.
Condition of landscape elements	Moderate/medium but low in the arable northern section of the AoLC.
Landscape Value	
Sense of remoteness	Slight/Low - Low due to relationship to urban edge
Scenic beauty/quality	Moderate/medium - Foreground of attractive views into AONB
Tranquillity	Moderate/medium - Variable - Improves further from road.
Historic features which contribute to sense of place	
Visual Sensitivity	
Local inter-visibility within the character area	Substantial/Good/ High Largely open views across most of area
Prominence in wider landscape/ Inter-visibility between CAs	Substantial/Good/High Northern part has seamless visual connection with S Devon AONB
Contribution to wider setting of Torbay and beyond admin boundary	Substantial/Good/High Land provides broad setting of the urban area and provides buffer to the AONB
Viewing population and physical accessibility	Substantial/Good/High Access limited to busy Brixham Road

The Enderby report makes the following relevant comments with regard to the capacity of this area to accommodate change and the potential for mitigation.

"Much of this land is open to views from the AONB to the west and south. The existing urban edge is well integrated and any new development would extend the edge into this open landscape. There is therefore only limited potential to accommodate change without substantial wider impact. Small scale development within a more discrete area north of Galmpton could potentially be accommodated if sensitively sited, although the relationship to the Conservation Area and AONB would need to be carefully considered. Mitigation of any proposed development changes should be achieved through a combination of careful siting with strong screen planting and the reinforcement of existing field hedgerow boundaries would be necessary."

The report recommends a landscape management strategy of enhancement of the existing hedgerow network by planting of new hedgerow trees and copses to help to integrate the urban edge further in views from the AONB to the west. Reinstatement of field boundaries in the northern part should be encouraged and these would supplement planned strategic planting around the proposed extension to the employment site at White Rock.

This run through of the published landscape character assessments provides both good descriptions of the site and its surroundings and gives clear guidance on possible landscape opportunities.

Visual Assessment

A site visit was made in May 2014 for summer views and in February 2015 for winter views, where a visual assessment was undertaken to review the potential visual impacts of the development on the surrounding landscape.

Views into the site

As highlighted by the planning inspector for the Phase 1 White Rock development and in the Enderby report, the site is visible in views from the surrounding countryside – in particular from the west and south - which is also the land covered by the AONB designation. This section goes into further detail on the views into the site.

Views from the site

To the east – the existing urban edge of Goodrington along the Brixham Road is clearly visible from the site, particularly from the northern section where there is very low boundary vegetation. The coast and sea are not visible.

To the north – at present (May 2014) the Phase 1 development is not visible to the immediate north of the site. The woodland at Waddeton Lane Plantation and the effect of the topography prevent extensive views towards Dartmoor and the north.

To the west – the high ground to the south of Cornworthy is visible on the horizon but the River Dart is not visible.

To the south – the tree clump on top of Fire Beacon Hill, on high ground south of Dittisham, is a distinctive feature in views to the south. The wooded slopes of the Dart River (Lord's Wood) are also clearly visible but only the high ground above the village of Dittisham is visible, not the village itself. From the western section of the site there are views towards the high ground within the AONB that lies to the south of Galmpton and west of Brixham.

As the views from the south and west are the most sensitive, a range of viewpoints were chosen in these areas, many of them in the AONB. Figure 7 shows the Viewpoint Location Plan and pages 18 – 31 show the viewpoints and the assessment and masterplan implications.

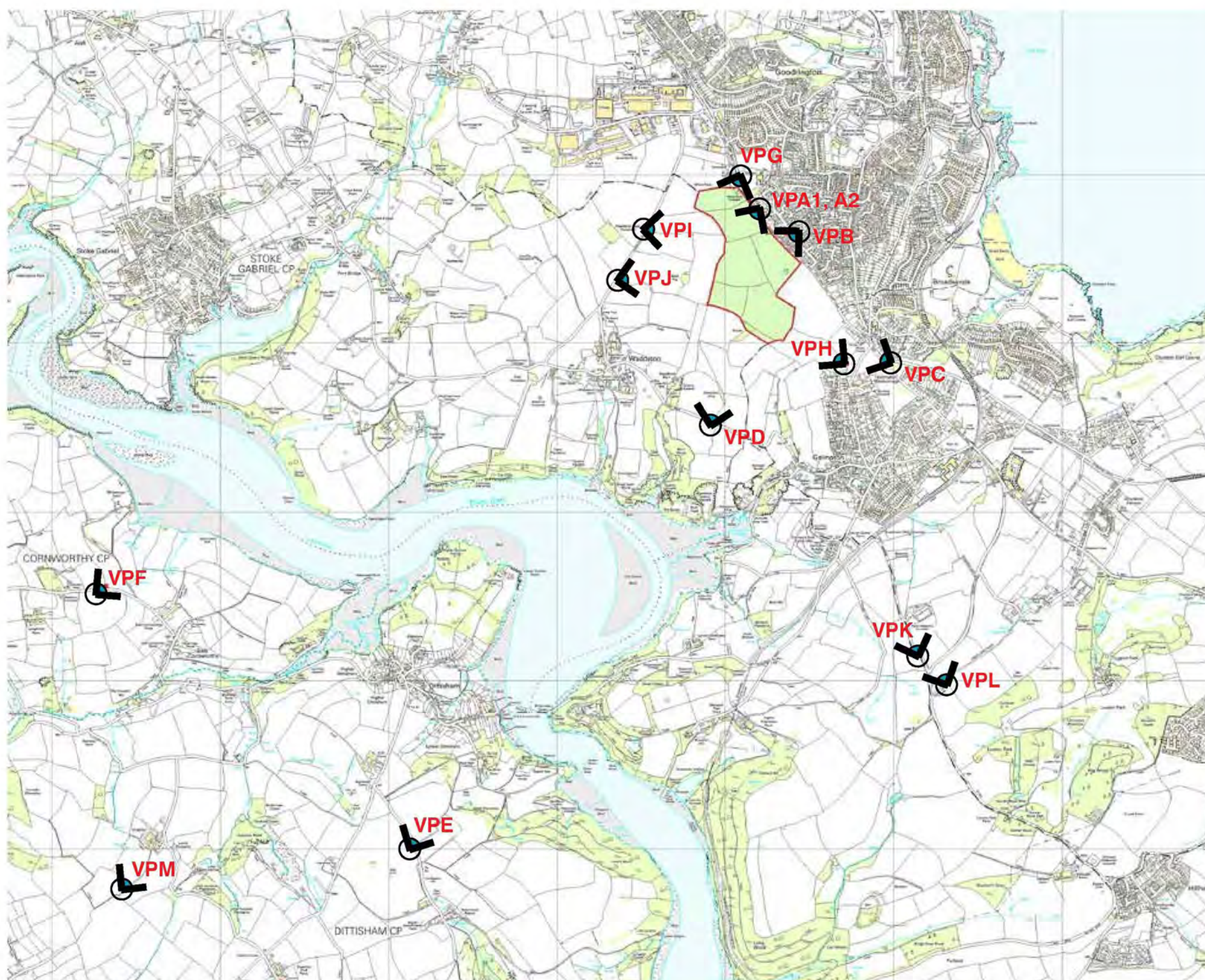
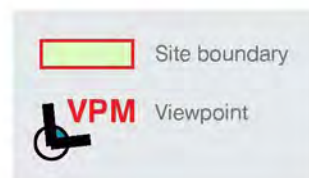
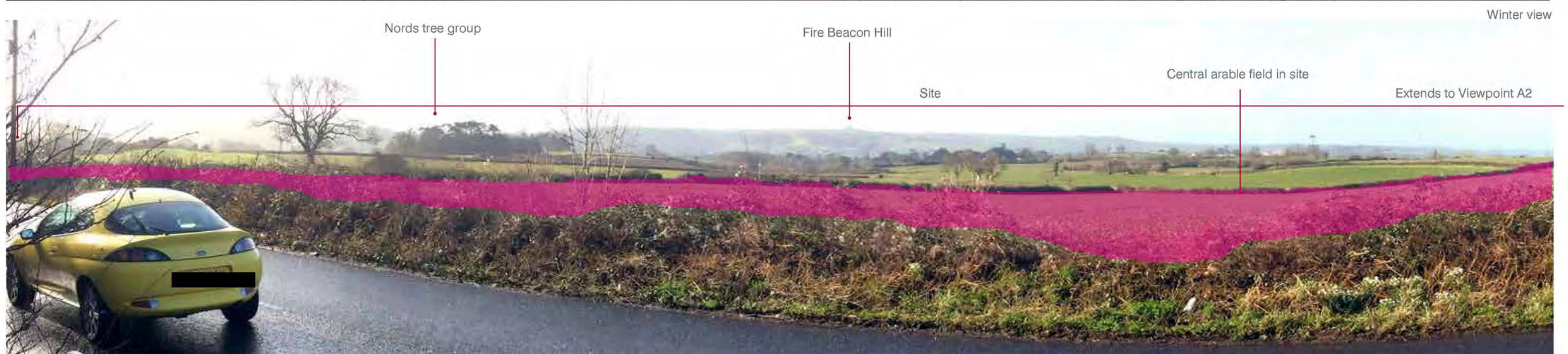


Fig. 12 Viewpoint Locations

Viewpoint A1: Brixham Road



Views from Brixham Road at entrance to housing from cycle path – looking west and south



Date of photo: 13/05/2014
 OS reference: 288202, 57779
 Viewpoint height: 71m AOD
 Distance to site: <10m

Summer View:

Clear views into site across this low hedgerow will restrict existing open views of the AONB for users of this footpath and cyclepath.

Winter View:

The hedgerow along Brixham Road does not have the leaf density compared to summer periods, this offers unobstructed views into the site. Given the close proximity of the site from this viewpoint the strengthening of the existing hedgerow with native planting and hedgerow trees would improve the visual amenity and aid to soften the development from Brixham Road.

Masterplan implications

Depending on the location of the site access, this boundary hedgerow would benefit from being strengthened with additional native hedgerow planting and hedgerow trees to improve the visual amenity along this road and to assist in softening the edge of the development and to partially screen views into the development from the houses along this road.

Viewpoint A2: Brixham Road

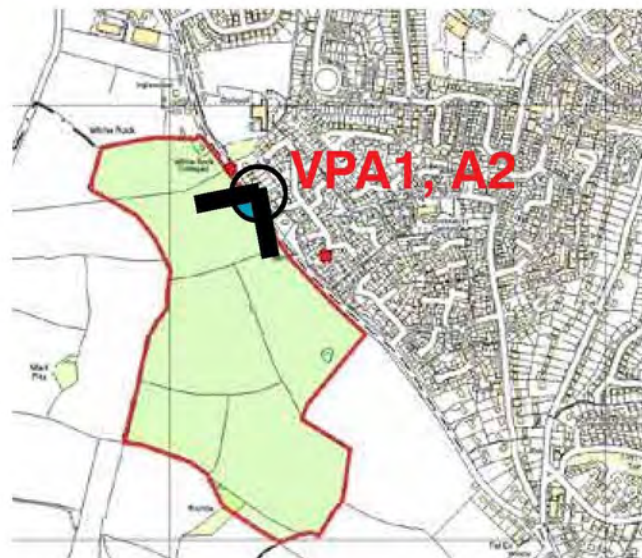
Summer view



Winter view



Views from Brixham Road at entrance to housing from cycle path – looking west and north



OS reference: 288202,57779
Viewpoint height: 71m AOD
Distance to site: <10m

Summer view:
More limited views of the areas to the north and northwest of the site. Boundary vegetation around White Rock cottages and along roadside restricts views.

Winter view:
The hedgerow along Brixham Road does not have the leaf density compared to summer periods, this offers unobstructed views into the site. White Rock cottages are more prominent at the northern boundary of the site.
Given the close proximity of the site from this viewpoint the strengthening of the existing hedgerow with native planting and hedgerow trees would improve the visual amenity and aid to soften the development from Brixham Road.

Masterplan implications

Depending on the location of the site access, this boundary hedgerow would benefit from being strengthened with additional native hedgerow planting and hedgerow trees to improve the visual amenity along this road and to assist in softening the edge of the development and to partially screen views into the development from the houses along this road.

Viewpoint G: Brixham Road

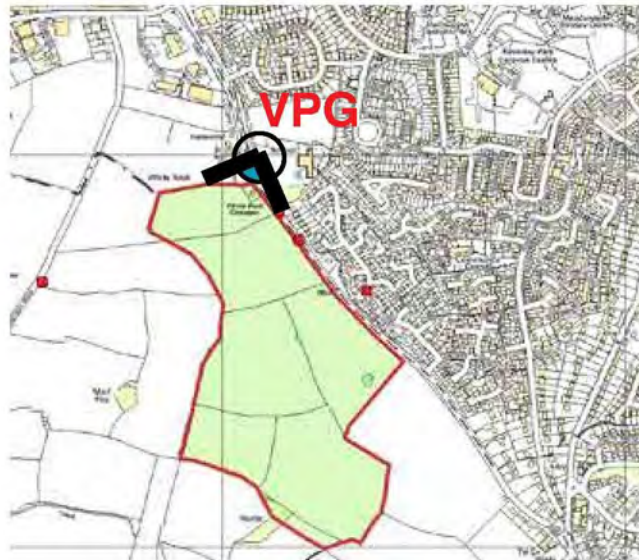


Summer view



Winter view

Views looking south from the cyclepath/footpath alongside Brixham Road from outside The Cottage detached residence.



OS reference: 288140,57859
Viewpoint height: 76m AOD
Distance to site: <20m

Summer views:

Open view into southern section of site across the boundary hedgerow along Brixham Road. There are extensive views towards the south and west including the woodland around Lupton Park at Churston Ferrers and surrounding hills in Kingswear.

Winter views:

The hedgerow along Brixham Road does not have the leaf density compared to summer periods, this offers unobstructed views into the site and further south / south west. Given the close proximity of the site from this viewpoint the strengthening of the existing hedgerow with native planting and hedgerow trees would improve the visual amenity and aid to soften the development from Brixham Road.

Masterplan implications

Users of this path and motorists would still have views of the hills in the distance if the boundary hedgerow along this edge was strengthened and maintained between 3 and 3.5 metres but not if it was higher.

Viewpoint B: Brixham Road

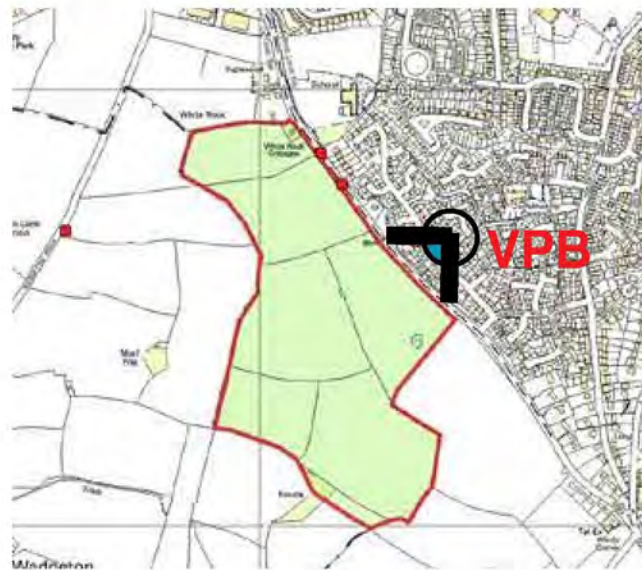
Summer view



Winter view



Elevated views, looking west/southwest from public footpath near Steed Close, overlooking Brixham Road adjacent to the Dew Wood detached house (mock tudor house).



OS reference: 288289,57706
Viewpoint height: 71m AOD
Distance to site: <20m

Summer view:
Filtered view towards a section of the central arable field with a view of the central E-W hedgerow with some trees within it and Waddeton Lane Plantation beyond the western edge of the site. The existing tall boundary tree planting along the eastern edge of Brixham Road screens views of the road and also the countryside beyond for many residents within Goodrington.

Winter view:
The deciduous tree canopies that offered partial filtered views during the summer now expose at greater visual extent of the site from this pedestrian footpath. The rolling topography across the site is also more clearly visible. From this view point the strengthening of the existing hedgerow boundary along Brixham Road with hedgerow trees would help reduce the visual impact. The close proximity of this view point considers that winter views will have a greater visual exposure of the site than summer periods.

Masterplan implications

The eastern boundary of the Brixham Road has variable amounts of informal, tree planting. This screens some housing but leaves some stretches very open with a hard edge in distant views. There is an opportunity for more formal avenue or managed tree and hedgerow planting along this road to integrate the existing housing with new development.

Viewpoint C: Galmpton

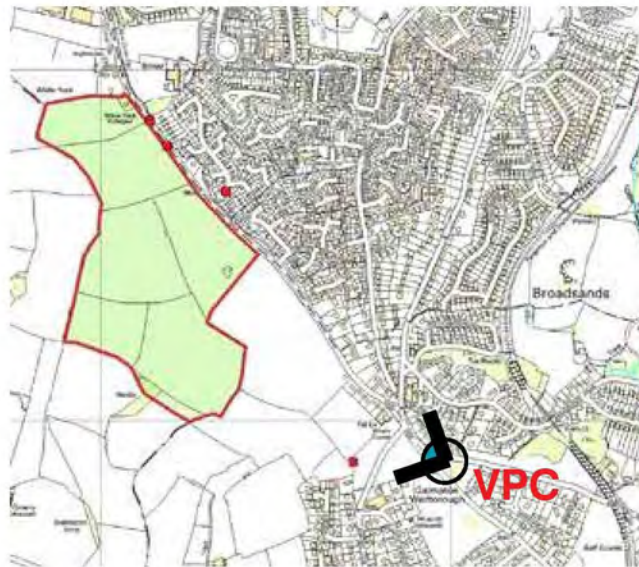
Summer view



Winter view



Views looking Northwest from area of open space within the Conservation Area in Galmpton, near War Memorial and close to the corner house.



OS reference: 288888, 56848
Viewpoint height: 65m AOD
Distance to site: 0.56km

Summer views:

Possible glimpsed view of development especially in winter months so important that the southern boundary is strengthened with tree planting. View already includes the edge of Goodrington and very busy road so not introducing a new element and view of site is not seen in same arc of view as the view of the bay.

Winter views:

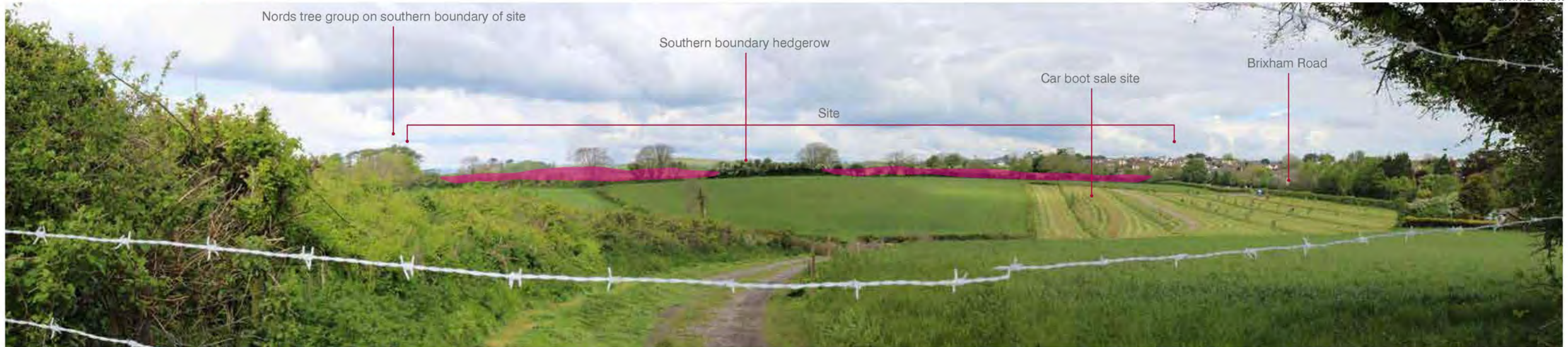
From the conservation area the dense tree canopies still retain the screening element that only allows for glimpsed views to the site during winter periods.

Masterplan implications

The excellent screening from this Conservation Area means that views from this direction would appear to not be a constraint and allows higher density development to be concentrated in the southern section of the site. However, potential glimpsed views during winter months and the view from the field gate mean that it is still important that the southern boundary of the site is strengthened with additional tree and hedgerow planting.

Viewpoint H: Galmpton

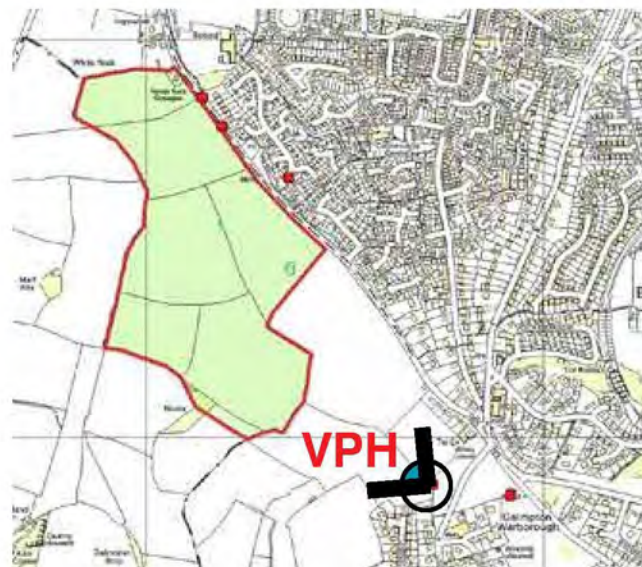
Summer view



Winter view



Views looking North from Conservation Area within Galmpton – from track into field near the Galmpton Medical Centre and to the south of the tree belt.



OS reference: 288722,56876
 Viewpoint height: 62m AOD
 Distance to site: 0.38km

Masterplan implications

Important to strengthen the planting along the southern boundary to protect views from the Conservation Area.

Summer view:

This field entrance offers clear views of the field that is used for car boot sales. This field lies adjacent to the site and filtered views of small parts of the site are glimpsed through the southern boundary hedgerow. This viewpoint shows that there are views of the site from within the Conservation Area.

Winter view:

The rolling topography lifts the hedgerow in a central location to the southern boundary of the site, during winter periods the field hedgerow maintains filtered views and partial screening of the site from this view point. The urban residential edge to Brixham Road is more visual during winter as the deciduous tree canopies offer less screening to houses and rooflines.

Viewpoint D: Stoke Gabriel Road

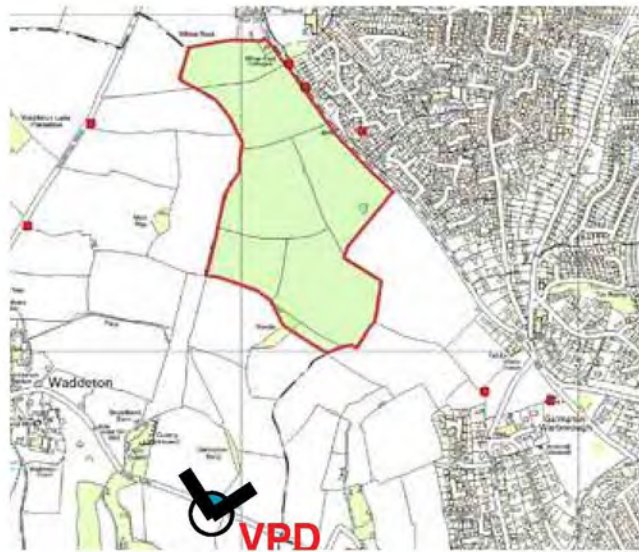


Summer view



Winter view

Galmpton Strip



OS reference: 287922,56545
Viewpoint height: 58m AOD
Distance to site: 0.66km

Summer view:

The group of trees just north of road (the Galmpton Strip) and the trees within Nords behind both act to obscure the southern half of site. The two sycamore trees in the northern hedgerow to the immediate south of White Rock cottages are visible as is the bright green arable field but in the main this section of the field is not within the site boundary.

Winter view:

The existing conifer trees retain their visual screening properties during winter periods and obscure views to the southern half of the site. However the deciduous hedgerow trees now provide less screening to the northern section of the site.

This view is a glimpsed view from a gateway along Stoke Gabriel Road which is bound by a hedgerow and hedgerow trees with limited opportunities to view the site.

Masterplan implications

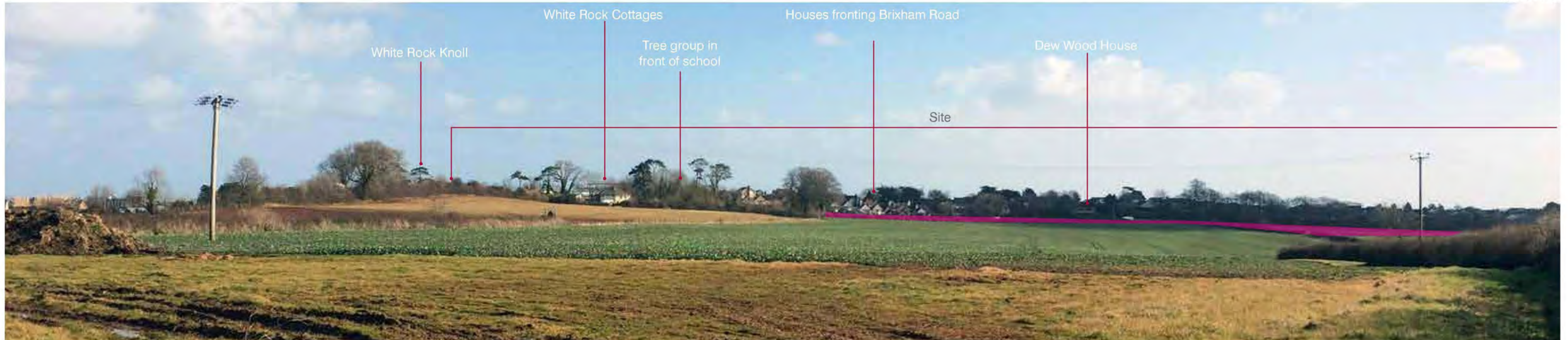
The existing wooded skyline of this view may change in the short term with the development of the housing within Phase 1. The screening benefits of the trees within this close range view suggests placing higher density development within the southwest section of the site.

Viewpoint I: Waddeton Road

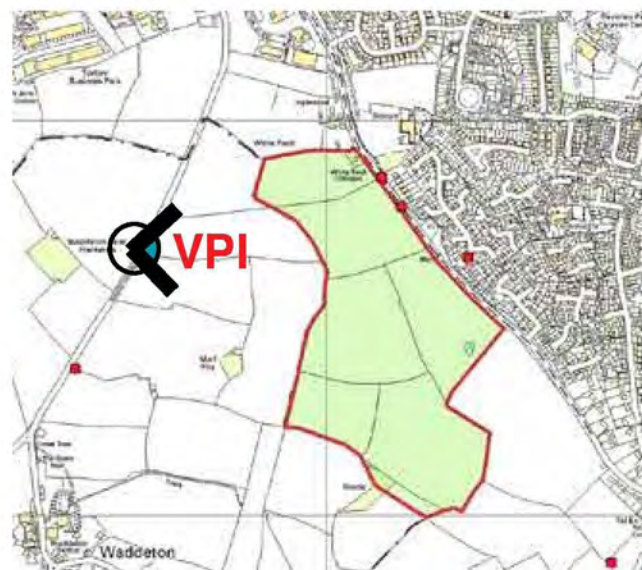
Summer view



Winter view



Views from field gate on Waddeton road, looking east.



OS reference: 287537,57664
 Viewpoint height: 74m AOD
 Distance to site: 0.31km

Summer view:
 Close view of north western edge of site with clear view of White Rock cottages and the school behind them. The telegraph pole and wires are visible on the western site boundary. Very low trimmed hedges along Brixham Road allows a clear view of the row of detached housing with no trees in front of them along the Brixham Road. Rising ground (knoll) to north of site is noticeable.

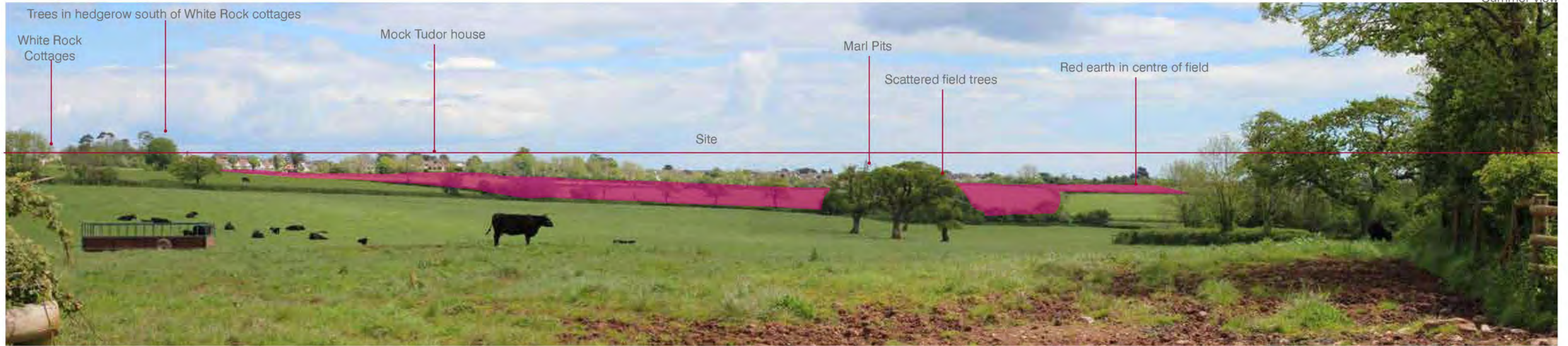
Winter view:
 The lack of any hedgerow and / or trees between this view point to the site retains the same visual exposure during summer and winter periods. The deciduous trees over the knoll and along Brixham Road expose more of the urban residential edge in winter than during summer periods.
 This view is a glimpsed view from a gateway along Waddeton Road which is bound by a hedgerow and hedgerow trees with limited opportunities to view the site.

Masterplan implications

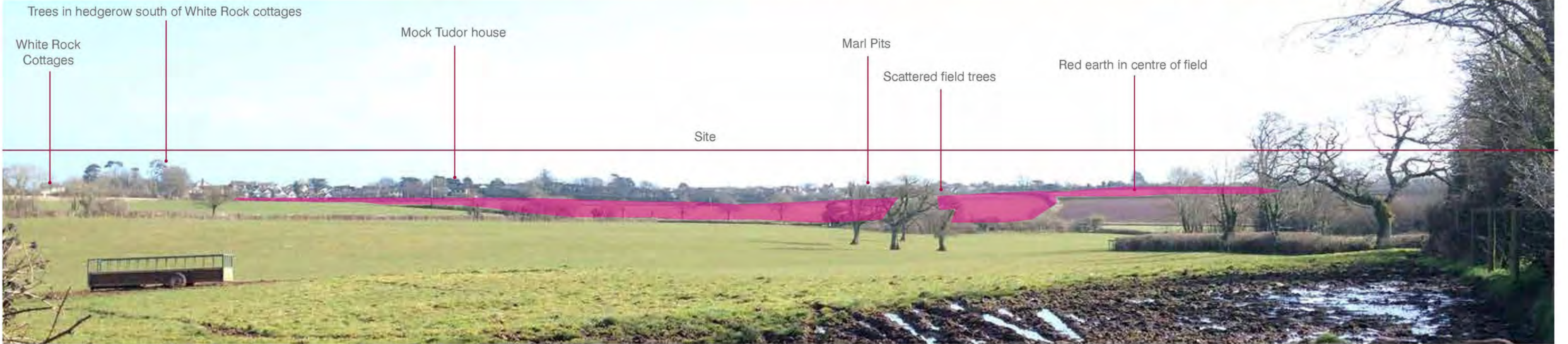
Create new, planted edge to western edge of development as non existent from this direction. Strengthen existing boundary planting.

Viewpoint J: Waddeton Road

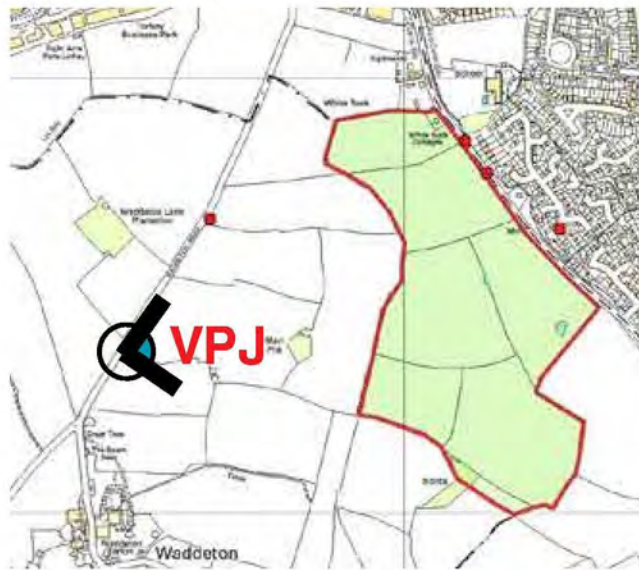
Summer view



Winter view



Views from field gate on Waddeton Road, looking east.



OS reference: 287355.57361
Viewpoint height: 68m AOD
Distance to site: 0.58km

Masterplan implications

Existing views of housing means that can replicate this with housing in this area in front of existing housing as long as broken up with tree planting.

Summer view:

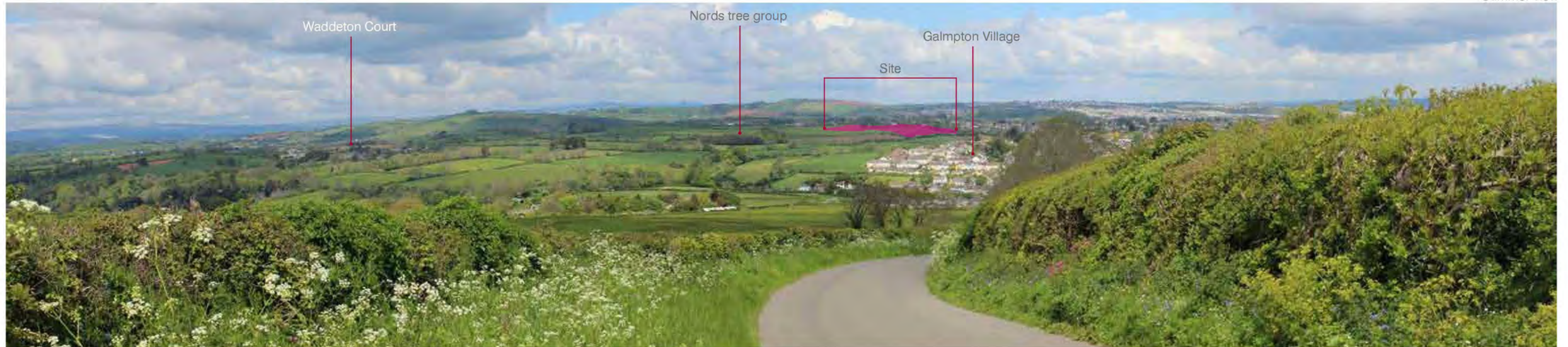
Trees within fields and at Marl pit provide some screening but fairly open view as few boundary hedges along the western side of site.

Winter view:

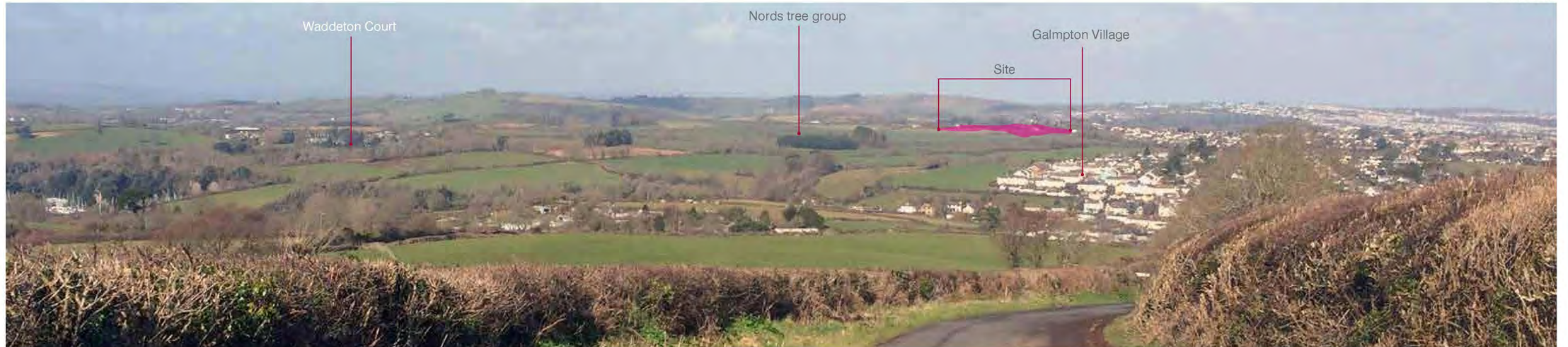
From this view point the deciduous nature of the field trees allows for slightly more of the site to be viewed and the urban residential edge of Brixham Road. This view is a glimpsed view from a gateway along Waddeton Road which is bound by a hedgerow and hedgerow trees with limited opportunities to view the site.

Viewpoint K: AONB Boundary

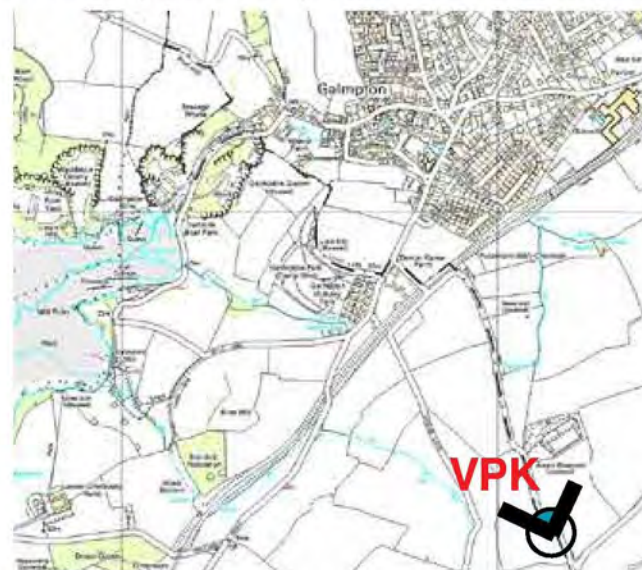
Summer view



Winter view



View north from minor road nr Reservoir (south of Galmpton), on the boundary of the AONB.



OS reference: 289137,55165
Viewpoint height: 108m AOD
Distance to site: 2.02km

Summer view:
Clear view of site sitting between the edges of Goodrington and Galmpton. The edge of Galmpton village is a detractor in this high value, wide ranging view that extends to Dartmoor. The field to the south of the site provides clear separation between the site and Galmpton in this view. The development to the north of the site is only partially visible in this view (two warehouses off Woodview road) and the land within the site is seen as the clear green edge to Paignton. The two sycamores are very prominent features within the site.

Winter view:
From this elevated distant viewpoint the winter visual impact would be considered similar to that during summer periods. The deciduous tree canopies offer slighting less screening properties, whilst considerations for additional planting to the southern boundary of the site would be beneficial. The village of Galmpton remains as the main visual detractor from this view point.

Masterplan implications

Would help to lessen the inevitable high visual impact from this location within the AONB if housing did not extend westwards past the line of Galmpton housing (outer edge the detached housing along Stoke Gabriel Road) as seen in this view. The maximum western edge of the housing should be regarded as the western edge of the detached houses within Galmpton along the Stoke Road. If this is not possible then structure planting should be planted to extend the existing Nords plantation area to provide a green edge along this line and lower height and lower density housing located within this area.

Viewpoint L: AONB Boundary

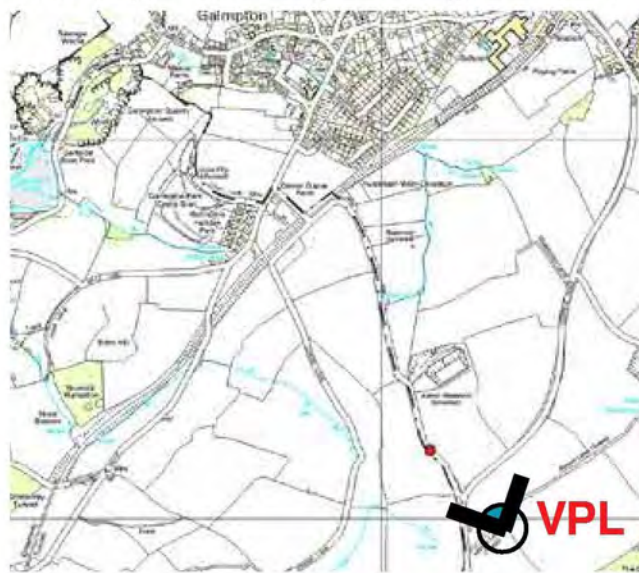
Summer view



Winter view



Single view north from long distance footpath – John Musgrave Heritage Trail – on the AONB boundary.



OS reference: 289252, 54942
Viewpoint height: 118m AOD
Distance to site: 2.28km

Summer view:

Clear view of central part of site beyond central E-W hedgerow. The full wide ranging view from here includes view of the sea and of Dartmoor. View is seen as open countryside to the western edge of Goodrington. Does not include view of Galmpton housing in front or the large developments to the north so development of the site would be more of a change from this viewpoint than others in the immediate area.

In a LVIA, there would be a greater level of visual effect from this viewpoint as it is a promoted Public Right of Way. The view is only possible from a gate entrance and not from the whole footpath.

Winter view:

From this elevated distant viewpoint the winter visual impact would be considered similar to that during summer periods.

This view is a glimpsed view from a gateway along a public footpath which is bound by a hedgerow and hedgerow trees with limited opportunities to view the site.

Masterplan implications

If possible, retain and strengthen the central hedgerow, and plant up the southern boundary with trees. Development of the site would be clearly visible from this viewpoint.

Viewpoint E: Fire Beacon Hill

Summer view



Winter view



Views north east from Fire Beacon Hill.



OS reference: 286190,53913
 Viewpoint height: 160m AOD
 Distance to site: 3.74km

Summer view:
 Open view towards the western areas of the site seen with Goodrington behind but also the sea. Existing bright green arable field very visible. Low, overtrimmed hedges on western boundaries of site provide no screening at all and there are no trees along this edge to break up the view. Trees within The Nord plantation screens possible development in the very southeast of the site. Edge of housing along Brixham road quite harsh and visible (white painted houses).

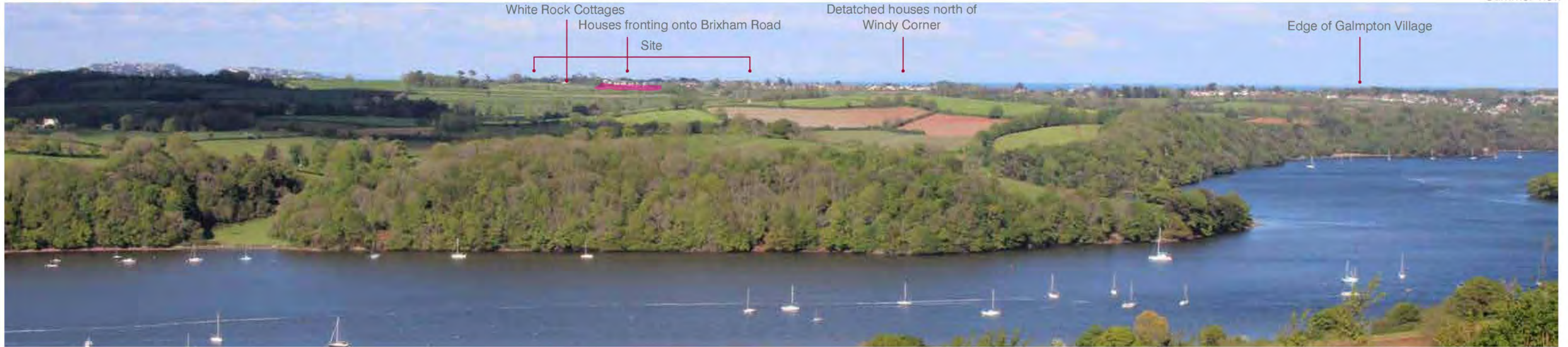
Winter view:
 From this elevated distant viewpoint the winter visual impact would be considered similar to that during summer periods. There is not signification vegetation to the western boundary of the site to provided possible screening from this view point. The winter view illustrates the increased overall impact that urban development has around Torbay and the harsh edges more clearly define than during summer periods form this view point.

Masterplan implications

The existing harsh edge allows further development within eastern edge as housing here would just act to extend this urban edge and if softened by planting it would help to soften the existing built edge of Torbay in views from the AONB.

Viewpoint F: Cornworthy Road

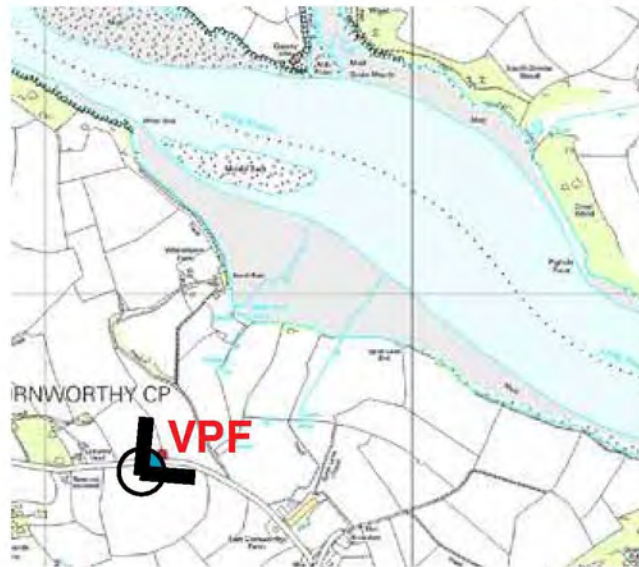
Summer view



Winter view



View north east/ east from roadside field gate on Cornworthy road within the AONB.



OS reference: 288128,57889
Viewpoint height: 103m AOD
Distance to site: 4km

Summer view:

View of northern half of site, southern section filtered by trees at Marl Pits and other off site planting. View shows that at this distance dense structure planting (eg the small woodland to the east of White Rock cottages and the two trees to the south as well as the Nords plantation) acts to obscure views of parts of the built edge of the existing housing within Goodrington.

Useful to note that the urban edge of Goodrington is on the western side of Brixham Road in views from this area – the six detached houses just north of Windy Corner in Galmpton are visible. There are clear views of the western edge of Galmpton and this provides a useful boundary of existing built development.

Winter view:

From this elevated distant viewpoint the winter visual impact would be considered similar to that during summer periods.

Masterplan implications

Structure planting along the western edge of the development would allow housing within the central and eastern sections to be screened in long distance views from this part of the AONB.

Try not to exceed the western limits of visible development set by the existing urban edge of Galmpton.

Viewpoint M: Bridleway near Capton

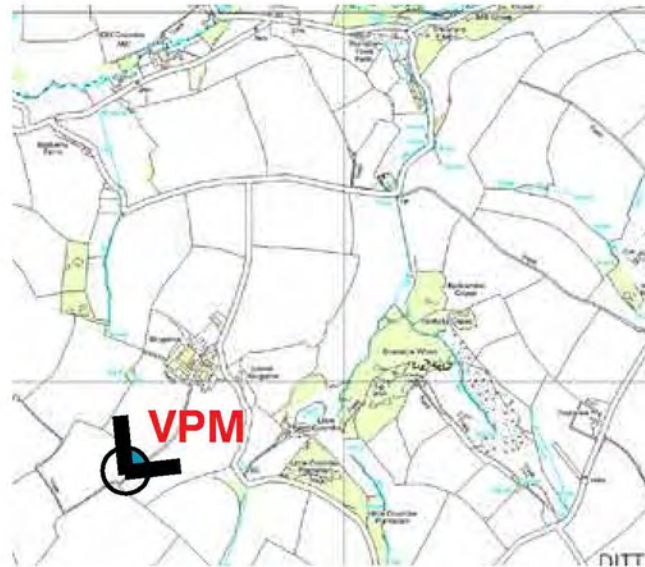
Summer view



Winter view



View north east from a public bridleway on high ground to the north east of the hamlet of Capton, within the heart of the AONB.



OS reference: 284281,53607
Viewpoint height: 170m AOD
Distance to site: 5.25km

Summer view:

Views of both the site and the sea beyond. The site is seen as a green strip in front of the existing Goodrington housing edge. The village of Galmpton is prominent and creates a good guide to the limit to built development. Fields to the west of the site are prominent in the view and would successfully create a new green edge to Paignton in distant views from this area.

Winter view:

From this elevated distant viewpoint the winter visual impact would be considered similar to that during summer periods.

Masterplan implications

This view would suggest that unlike in the view from near the Reservoir, the whole of the site would sit behind the existing edge to development that the village of Galmpton defines.

Summary of Visual Assessment

The viewpoints show that the site is visible in short, medium and long range views from a wide range of publicly accessible locations within the South Devon AONB.

The effects of the intervening vegetation and the local topography means that the site is not generally visible from the nearby villages of Galmpton, Waddeton, Stoke Gabriel and Aish. Glimpsed views of sections of the site are possible from field entrances in local roads but in general the high Devon hedgebanks prevent views.

Views from the River Dart

In general the site is not visible from the River Dart or from its quays and creeks. The site is visible in views from higher ground which include the River Dart in the foreground (e.g. from high ground in Cornworthy and above Dittisham Mill Creek) so it can be said to be part of the setting of the River Dart.

Views of the existing urban edge of Goodrington

In many of the views from the west the existing urban edge along Brixham Road is noticeable because of the front-on, white painted, double ridged houses with clumps of mixed deciduous and coniferous trees to break the visible edge line of housing. The tall pines are a feature of this character area and could be replicated within the proposed structure planting.

Views towards the sea

In general the site is not seen in views of Tor Bay. From the hills within the AONB to the south and west the sea and the site can be seen in the same distant view. In views towards the sea from Capton (Viewpoint V7) the site is seen as the green edge to the existing urban development of Torbay. In views from the JMH Trail, to the south of the site the sea is seen with the urban development of Paignton as well as the site.

Short-range views from the AONB

The scale of the likely visual effects of the development (within a formal LVIA assessment) is inevitably going to be higher in short-range views. View D is particularly important in this respect. In this view the central and southern section of the site is screened but the northern edge of the site is visible to the west of the White Rock cottages.

This area of the site is allocated for off-site mitigation planting associated with Phase 1. With this planting in place and advance planting of the western site boundary, it is possible that there would be no views of the proposed development on the site from this location.

Site Opportunities

The visual assessment shows that there are a range of landscape solutions that are possible either as screening or as a form of mitigation.

These are outlined below and shown on Figure 8.

- Restrict development to the central and eastern edge of the site to keep in line with the urban edge of Galmpton.
- Site the higher density development within the southern section of the site and ensure that this is screened in long distance views from the west and south with appropriate structure planting on the western boundary.
- Restore the existing defunct hedgebanks and over-trimmed hedgerows as part of a network of paths/greenways through the development.
- Plan new (along the western and northeastern boundaries) or strengthen the existing boundary hedgerows and include a high number of appropriate tree species.
- Create mixed woodland copses within the site or off-site to mirror the existing copses within the character area and allow public access to them, thus helping to meet demand for Accessible Natural Greenspace (one of Devon's Green Infrastructure objectives) through the development.
- Strengthen the existing planting along the southern boundary to ensure that short-range views from the Conservation Area at Galmpton are protected.

Conclusions

Development of the site would inevitably result in a creeping of the existing urban edge nearer to the boundary of the AONB.

However the extent is limited by the South Hams boundary and there would still be a number of green fields between the urban edge and the boundary of the

In the distant views towards the site from areas of high ground across the River Dart there would not be a radical change in the components of the view. With careful design of the structure planting the appearance of the urban edge of Torbay in these distant views would improve from the existing situation.

The high proportion of proposed planting and publicly accessible green space would ensure that this area of the Torbay Hinterland still acts as a buffer between the larger urban area and the open countryside beyond.

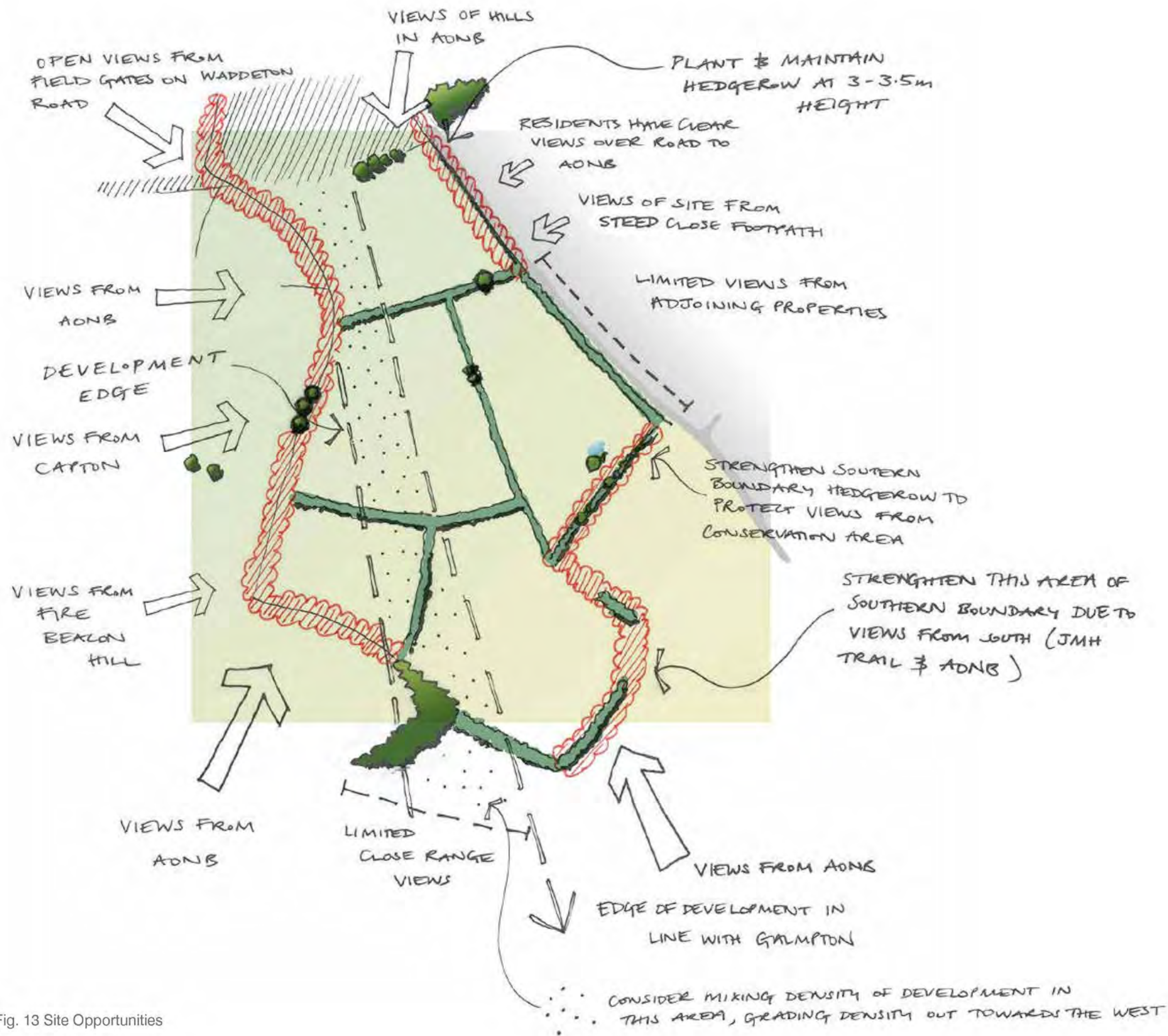


Fig. 13 Site Opportunities



PUBLIC OPEN SPACE

- OS1** Public open space on the southern slopes of the hillside protected from SW winds by the existing woodland and reinforced woodland boundary W3
- OS2** Public open space on the mid levels of the northern hill, this is an area of existing agricultural land that can be glimpsed through the trees and houses of the residential area east of Brixham
- OS3** Two areas of public open space adjacent to the Brixham Road that reflect the open edges to the roadside along Galampton Warborough common

WOODLAND

- W1** Existing established woodland at Galampton Warborough shields view of the site from this popular common. Glimpses of the site's highest points may be visible through the upper tree canopies, hence the proposal for additional planting at W2 and W4
- W2** Woodland planting on the brow of the hill reflecting the local pattern of woodland on high ground
- W3** The woodland edge screens the site from the distant views from the SW and the prevailing south westerly winds. This planting reinforces wildlife corridors along the existing hedge boundaries and creates new wildlife corridors to W4 (part of the original Whiterock application) across site boundaries that are currently open agricultural land
- W4** New woodland proposed in the original Whiterock application that adds to the local pattern of woods and prevents development on this highest point of the entire site where development could break the skyline in long distance views
- W5** Existing copse to expanded within the site

DENSITIES

- L1** Lower density housing adjacent to Brixham Road reflecting densities of the existing residential development on the eastern side
- M1** Medium density housing in valley between two high points of the site, less evident from the near views from brixham Road as this land falls away from the road, and protected from the distant south western views by new woodland planting W3
- H1** Higher density housing beneath public open space mid way up valley. Very restricted views from Fire Beacon Hill due to the existing and reinforced woodland and protected from views from Brixham Road by the topography
- emp** An area of employment land along the main Brixham Road, reflecting the uses north of this site and adding to the sustainability credentials of the development
- CV** Care Village of approximately 120 beds with an additional 40 assisted living units in a location overlooking other residential development, conveniently located along the Brixham Road and sheltered by the woods of W2

Fig. 14 Previous Emerging Concept Layout (2013)

Comment on the 2013 Concept Layout

Figure 14 shows the emerging general concept layout taken from the White Rock 2 Urban Expansion Land Promotion Submission from April 2013.

Table 3 provides comment on this concept layout, following the work carried out to inform this report in 2014.

This suggests a variation of land uses to the 2013 plan, as set out in the table.

Comment on the 2013 Emerging Concept Layout

2013 Emerging Concept Layout comment		2014, comment on the 2013 layout
Public open space		
OS1	Public open space on the southern slopes of the hillside protected from SW winds by the existing woodland and reinforced woodland boundary W3.	There is potential for this area to be reduced and re-sited; this would be an area suitable for higher density housing.
OS2	Public open space on the mid levels of the northern hill, this is an area of existing agricultural land that can be glimpsed through the trees and houses of the residential area east of Brixham [Road]	The view from the residential area to the east of Brixham Road (viewpoint B) demonstrates that this area of the site is unlikely to be visible from properties within this area. However, this area of the site is clearly visible in views from viewpoint K within the AONB, where there are also glimpsed views of the employment (white roofed sheds) to the north. This would suggest that there is potential to site employment in this area. This would allow the opportunity to provide local residents with a greener edge along the Brixham Road, instead of the employment area.
OS3	Two areas of public open space adjacent to the Brixham Road that reflect the open edges to the roadside along Galampton Warborough Common.	Instead of this area of open space, it would be more desirable to retain a longer, narrow green strip along the road to preserve the view and amenity of the residents directly opposite the proposed development. This would allow space for some employment in the western section of this area and OS2.
Woodland		
W1	Existing established woodland at Galampton Warborough shields view of the site from this popular common. Glimpses of the site's highest points may be visible through the upper tree canopies, hence the proposal for additional planting at W2 and W4.	The strengthening of the southern boundary with a mix of trees would be sufficient to provide screening at this distance. Please see below for comments relating to W2.
W2	Woodland planting on the brow of the hill reflecting the local pattern of woodland on high ground.	This is relatively low compared to other hills in the area. This area of woodland planting would be better moved to the western boundary to create a softer edge to the development in views from the SW.

W3	The woodland edge screens the site from the middle and distant views from the SW and the prevailing south westerly winds. This planting reinforces wildlife corridors along the existing hedge boundaries and creates new wildlife corridors to W4 (part of the original White Rock application) across site boundaries that are currently open agricultural land.	
W4	New woodland proposed in the original White Rock application that adds to the local pattern of woods and prevents development on this highest point of the entire site where development could break the skyline in long distance views.	Woodland planting already committed
W5	Existing Nords tree copse to be retained and existing planting along this boundary to be strengthened with a similar tree and shrub species mix.	
Densities		
L1	Lower density housing adjacent to Brixham Road reflecting densities of the existing residential development on the eastern side.	
M1	Medium density housing on lower ground between two high points of the site, less evident from the near views from Brixham Road as this land falls away from the road, and screened in some of the distant south western views by new woodland planting W3.	It would be beneficial to pull the western boundary of this area back in order to mirror the edge of development set by the housing within Galampton.
H1	Higher density housing beneath public open space mid way up lower ground. No views from nearest land within the AONB (View D) but still clear middle distance views from Reservoir and Trail (Views K&L) and partial views from Fire Beacon Hill (View E) due to the existing and reinforced woodland. Protected from most views from Brixham Road by the topography and trees within the site.	This is a good location for this higher density housing, however it may be advisable to mix high and medium density housing in this area and then extend the whole area of housing into the current OS1 area and pull the M1 area away from the western edge.
Employment	An area of employment land along the main Brixham Road, reflecting the uses north of this site and adding to the sustainability credentials of the development	Refer to Comment 3 – it would be important to consider the amenity of residents opposite the development, unless a planting buffer alongside Brixham Road is included
CV	Care Village of approximately 120 beds with an additional 40 assisted living units in a location overlooking other residential development, conveniently located along the Brixham Road and sheltered by the existing woodland at Nords and proposed tree planting along the boundary in W5.	

3.3 Transport, Access and Movement

This section provides a baseline transport context, prepared to provide the highways context of the White Rock 2 site in terms of its location, committed development and transport / highway infrastructure, Torbay policy aspirations and initial consideration of the transport and highway matters associated with the future delivery of the site.

White Rock 1 Context

White Rock 1 obtained planning permission on 29th April 2013 for the development of 350 dwellings and approximately 37,000 sqm of employment floorspace. The scheme also included a local centre, student accommodation and open space.

The scheme was supported by a comprehensive Transport Assessment (TA). The findings of the TA and subsequent analysis led to a series of highway mitigations being agreed, these included:

- Upgrade to Brixham Road / Long Road / Goodrington Road signalised junction;
- New signalised junction at the Brixham Road / Kingsway Avenue Junction incorporating site access to White Rock 1. The new junction introduces improved pedestrian crossing facilities across Brixham Road ensuring better connectivity between the development site and existing residential areas to the east and north; and
- Introduction of dual carriageway between the two signalised.

Design and implementation of these improvements is currently ongoing and due for completion in 2014.

Strategic Highway Review

Torbay Council has identified that a significant length of the A380 / A3022 Western Corridor through Torbay should be upgraded in order to address unreliable journey times. This is particularly relevant during the summer months when demand is more significant, largely as a consequence of the high levels of tourist visits.

The improvements Torbay Council has identified for the Western Corridor are along a 4 mile section. The identified aims are to 'remove congestion, improve access to the wider road network and markets, reduce journey times for goods and labour and provide a clear message to developers to invest in further development opportunities.' A total of six related improvement works are proposed between Churscombe Cross (A380 Kings Ash Road / B3060 Marldon Way Roundabout) in the north to Windy Corner (A3022 / A379 Junction) in the south.

The improvements take the form of a combination of road widening, introduction of 2 lane dual carriageway and junction improvements. Funding for these works was sought from the Heart of the South West Local Transport Board with the scheme securing programme entry and funding of £7.3m. Match funding of at least 10% is also to be secured for the scheme by Torbay Council.

The works identified by Torbay Council are supplemented by the White Rock 1 highway works previously summarised.

A3022, Brixham Road Traffic Volumes

Traffic surveys of Brixham Road, as included in the Transport Assessment for White Rock 1, identified that AM and PM peak hour traffic volumes, broadly in the location of the White Rock 2 site frontage, were as follows:

- AM Peak – Northbound = 805 vehicles / Southbound = 541 vehicles; and
- PM Peak – Northbound = 621 vehicles / Southbound = 705 vehicles.

The inclusion of White Rock 1 traffic and other committed development identifies that traffic volumes based on a forecast assessment year of 2016 would increase to the following levels:

- AM Peak – Northbound = 991 vehicles / Southbound = 612 vehicles; and
- PM Peak – Northbound = 758 vehicles / Southbound = 839 vehicles.

Forecast Trip Generation

The consented White Rock 1 scheme included a trip analysis. The trip rates of the primary uses were as summarised in the following table:

Land Use	AM Peak		PM Peak	
	Arrivals	Departures	Arrivals	Departures
Residential	0.087	0.230	0.276	0.166
B1 Employment	1.793	0.195	0.192	1.465
B2 Employment	0.489	0.201	0.111	0.427

Applying the above trip rates to the likely development capacity of the White Rock 2 land provides an initial indication as to the potential trip generation of the site. This is summarised in the following table:

Land Use	AM Peak		PM Peak	
	Arrivals	Departures	Arrivals	Departures
Residential	33	86	104	62
Employment (based on B1)	100	11	11	82
Care Home / Assisted Living Units ¹	10	9	9	13
Total	143	106	124	157

Access Strategy

Due to topography, site access requirements and an increase in traffic associated with the new development, it is expected that there will be a need to realign Brixham Road.

The alignment would need to be pulled west into the White Rock 2 area of development with an access junction introduced. The realigned route and access junction would need to incorporate a link to provide for continued access to existing properties which utilise the current alignment of the A3022 Brixham Road for access to property.

To the north, the realigned road would need to tie into the existing Brixham Road alignment ahead of the junction with Kingsway Avenue, this being the point of the new White Rock 1 site access. To the south it would tie in broadly at a location ahead of the Hunters Tor Drive.

A review of sustainable transport connections would be required including how to tie in connections with the White Rock 1 site.

Future Assessment

Given the likely scale of development, a scheme for future development of White Rock 2 would require a Transport Assessment (TA). This would need to be prepared in line with the Department for Transport's Guidance on Transport Assessments but would consider the following matters:

- Determination of study area with review of the highway network and consideration of network junctions that would need to be incorporated within a capacity review
- Review of site accessibility including proximity to services including employment, health and leisure facilities. This would be supplemented with review of new accessibility measures to be introduced as part of the development including cycle and footway / path connections to existing infrastructure;
- Design review of a realigned A3022 Brixham Road including determination of site access incorporating all road user review and need to accommodate connection to those properties with frontage onto the existing A3022 Brixham Road; and
- Design of internal highway network giving due consideration to Manual for Streets and the movement of all road users through and across the development site.

In order to inform this Study and the development concepts that follow, a scheme for the realignment of Brixham Road has been prepared. This mirrors the existing provision, namely a single carriageway road although it should be noted that this does not necessarily represent the final scheme required in order to deliver development on the site; further work will be required to inform the final design which gives consideration to improvements planned in the area.

3.4 Topography and Drainage

This section provides a summary of the topography and drainage in the vicinity of the proposed development.

Topography

Figure 15 shows the topography of the site. The northern boundary is located on a ridgeline with an approximate level of 81m AOD. The land slopes down to the south with an average grade of 1:12 until the field boundary adjacent to Steed Close on the opposite side of Brixham Road. From here the land falls predominantly westwards from a level of approximately 69m AOD on the eastern boundary, to 61m AOD on the western boundary.

A ridgeline runs from the high point on the eastern boundary (69m AOD) to a point near the southern boundary of 67m AOD. From here, the land falls to the east to a level in the south-eastern corner of 60m AOD and to the west to a level in the south-western corner of 54m AOD.

Ordnance survey plans of the southernmost part of the site indicates that this falls towards the south to a level of approximately 60m AOD.

The existing topographical survey dates from 1994 and is therefore over 20 years old. It is likely that the topographic profile will have changes in this time, indeed work on the Western Bowl indicated level discrepancies of around 1m. A new topographical survey of the site is, therefore, essential.

Drainage- Surface Water

There are no surface or water sewers within the immediate vicinity of the site, including Brixham Road.

The existing topography suggests that Greenfield runoff from the site flows to the south-western boundary, where it is likely that a series of ditches and streams carry the water further south to discharge into the River Dart. Further investigation will be required to determine the route and methods of drainage.

The proposed development will be required to discharge surface water at a controlled rate, limited to the existing Greenfield runoff rates. The controlled surface water discharge could outfall into the existing streams to mimic the existing situation.

Figures 16 and 17 show a 675mm diameter surface water sewer and a 300mm diameter foul water sewer to the south-east of the site which lie outside of the site boundary, both owned by South West Water. The 675mm diameter surface water sewer flows south-west parallel to the southern boundary of the site before flowing south towards Stoke Gabriel Road.

Should the discharge into the existing streams prove impractical, investigations should be carried out into the feasibility of connecting into the existing 675mm surface water sewer, which will require either: easements across third party land, or a requisition agreement with South West Water. The latter option removes control of the design and implementation programme from the developer.

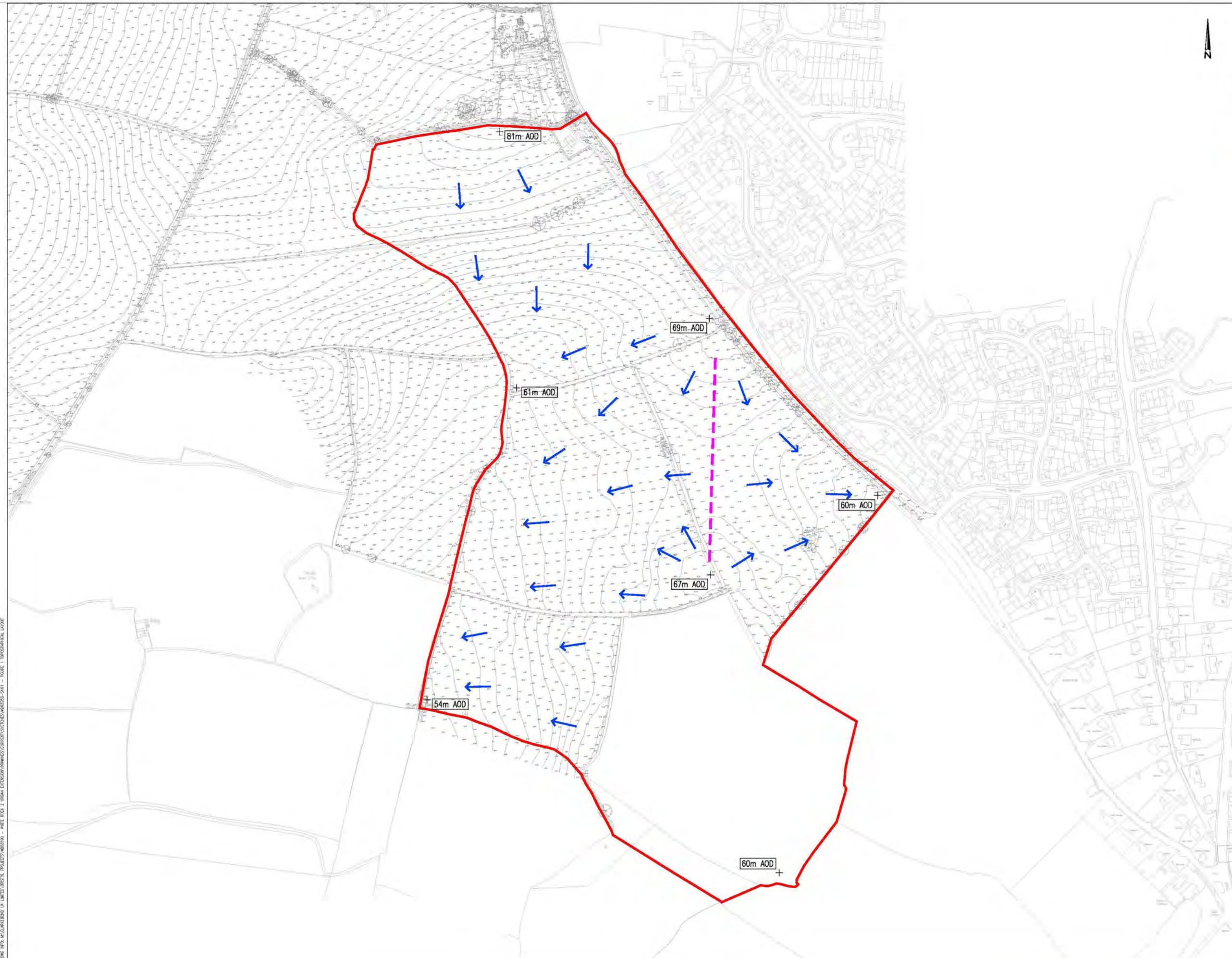
A detailed Ground Investigation should be carried out on the site to determine ground make-up and identifying local aquifers. The investigation should include infiltration tests to determine the suitability of soakaways for the surface water drainage.

Drainage - Foul Water

As identified in the previous figures, the nearest foul water sewer is the 300mm diameter sewer located south east of the site boundary. As the closest sewer to the site it is proposed that this be the point of connection into South West Waters foul sewerage system.

In order to connect to this sewer, there will need to be either a third party land crossing or a new sewer laid in Brixham Road to connect the site to the existing sewer.

The existing gravity sewer outfalls to a pumping station off Brixham Road. Discussions with South West Water will be required to determine if this has capacity for the proposed development.



CDM RESIDUAL RISKS
 The work shown on this drawing is both familiar to the designers and routinely safely built in similar circumstances by competent contractors.
 Risks are not considered significant.
 Relevant data is included in the Pre-Construction Information Pack
 Signed: _____ Date: _____

DO NOT SCALE THIS DRAWING
 CONTRACTOR TO CHECK ALL DIMENSIONS AND REPORT ALL ERRORS AND OMISSIONS TO THE ENGINEER

LEGEND:
 + [67m AOD] EXISTING HIGH/LOW SPOT LEVELS
 --- RIDGE LINE
 → DIRECTION OF FALL

Rev	Created	By	CHK	Date

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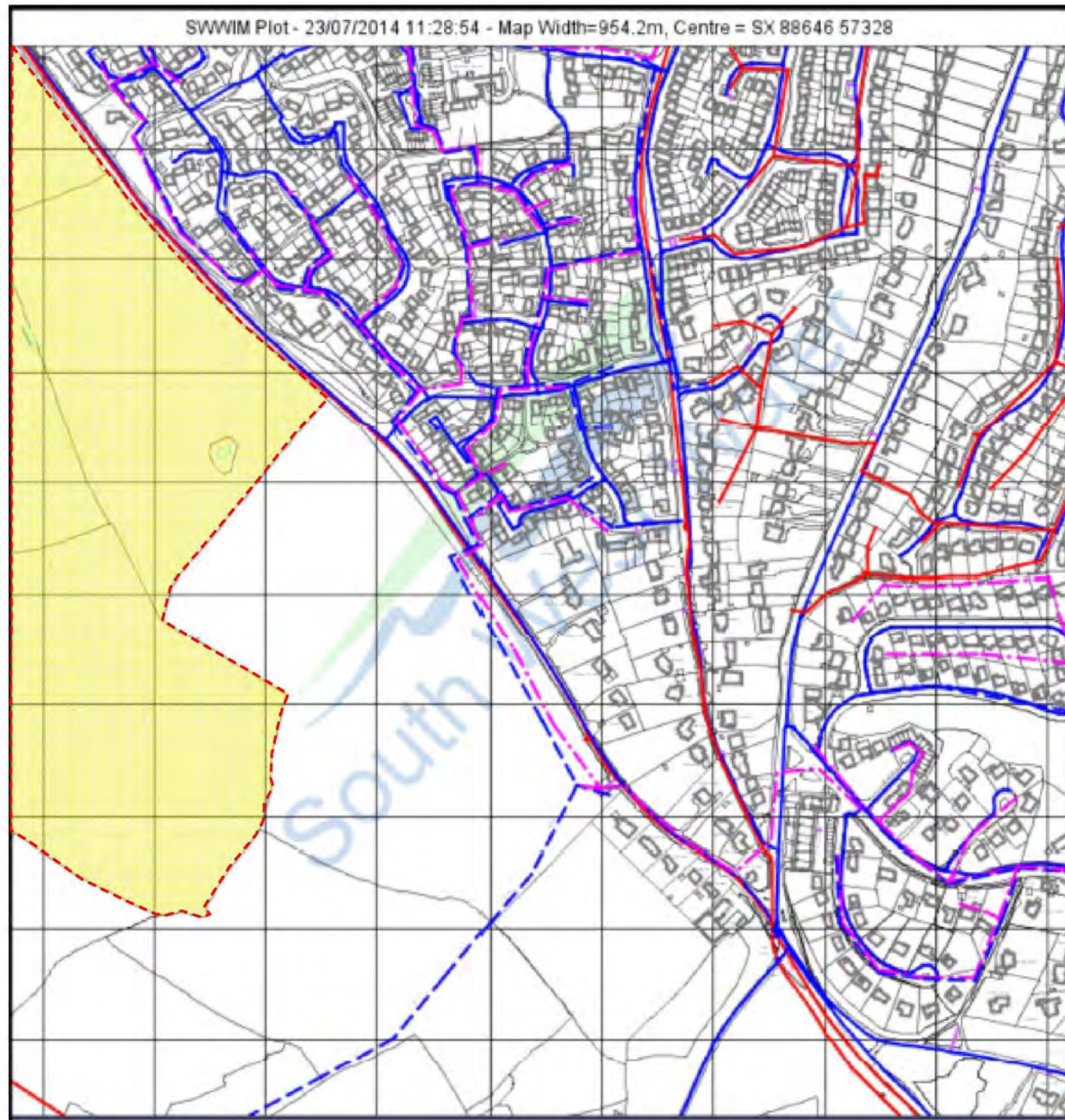
Client: **DEELEY FREED**
 Project: **WHITE ROCK 2 URBAN EXTENSION**

Drawing Title: **TOPOGRAPHICAL LAYOUT**

FIGURE 1
 Drawing Status: **PRELIMINARY**

Project No.	Description	Drawing No.	Revision
WB03590	C	SK01	*
Scale: 1:2000	Checked: AJ	Date: 28.07.14	Sheet Size: A1
Drawn: SJJ			

Fig. 15



100 m

SOUTH WEST WATER

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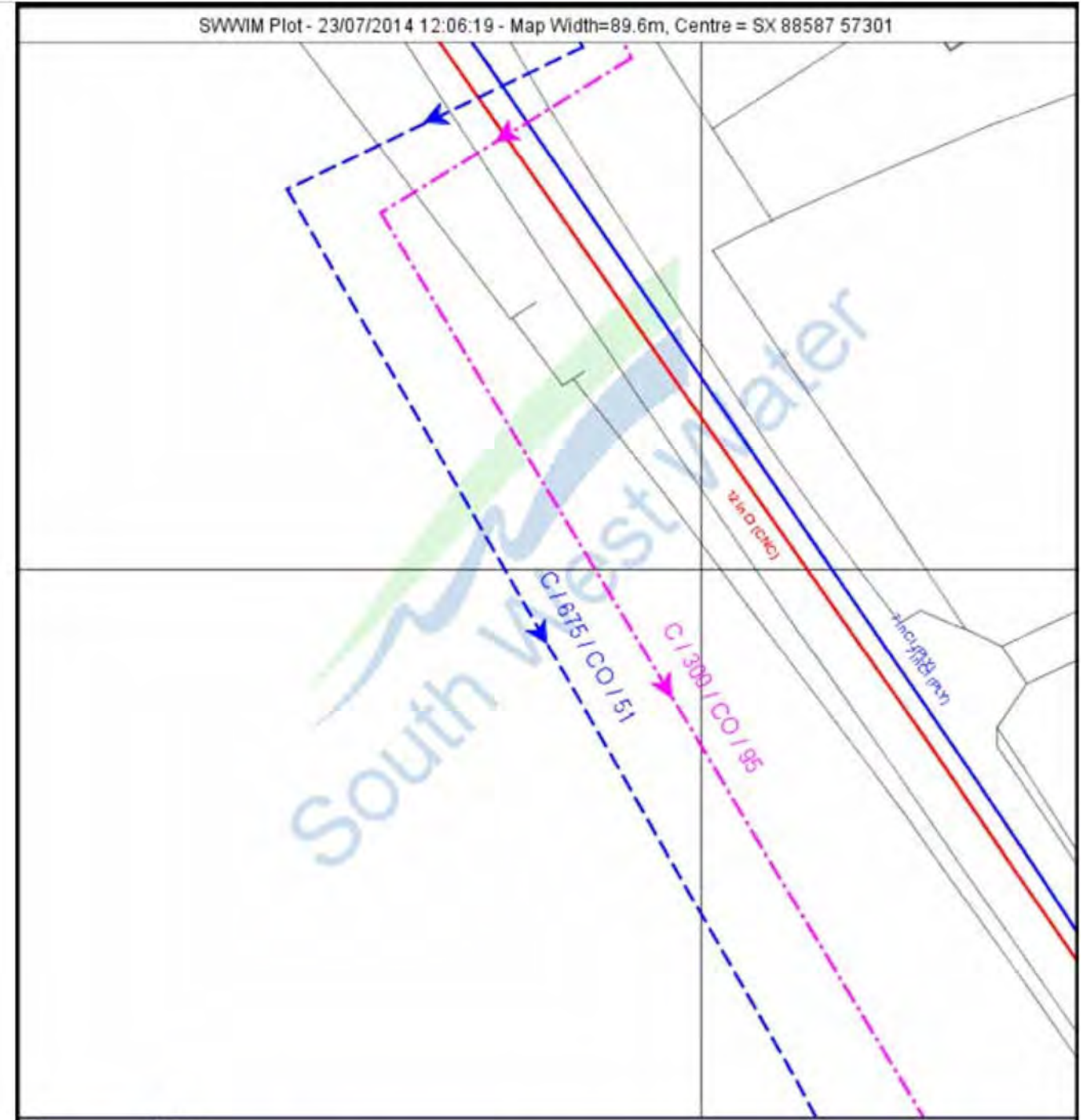
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Fig. 16



10 m

SOUTH WEST WATER

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Fig. 17

3.5 Ecology

Introduction

Ecological survey work has been conducted within the White Rock area for a range of planning applications. More specifically, Ecosulis conducted a survey in April 2010 to support the outline planning application for development at White Rock 1.

Ecosulis has subsequently undertaken updated survey work for White Rock 2 in 2014 and also for the White Rock 1 Pre-Emption Land (the land west of Brixham Road adjacent to the junction with Kingsway Avenue).

The site

Field Studies of the site identified the following habitats, each of which is mapped on the plan below:

- Buildings - present within the north-east corner of the site comprising two occupied modern residential buildings with associated amenity grassland;
- Improved and Semi-improved grassland - the majority of these fields appear to be occasionally cattle grazed and generally comprise species poor improved grassland, containing species such as cock's-foot, Yorkshire-fog, false oat-grass, sweet-vernal grass, soft-brome, common daisy, common vetch, creeping buttercup, dandelion docks, nettles and hogweed, lesser trefoil, meadow cranesbill, meadow buttercup, red clover, ribwort plantain, sow thistle species white clover;
- Arable fields in between grassland habitats comprise arable land with species including creeping buttercup and white clover;
- Hedgerows - A mature network is present across the site, all of which are native hedgerows, and therefore a UK Biodiversity Action Plan (BAP). Some hedgerows were recorded as species rich (containing at least five woody native species), although this is from a preliminary walkover only, and the number may therefore be higher. Almost all hedgerows on site take the form of Devon hedgebanks, with the hedge being supported by an earth bank, which are frequently stone faced. The presence of these features indicates a well-established hedgerow network. Mature trees are a feature of hedgerows throughout the site. In these areas where hedgerows are less intensively managed, many have numerous mature standards, and a good

ground flora, including a number of woodland species such as bluebell, dog's mercury and wood anemone, indicating a long-established hedgerow. Hedgerows within the central parts of the site are generally more heavily managed, with fields generally ploughed right up to the hedgebanks, and the hedgerows heavily managed, with few standard trees;

- Semi-broadleaved (mixed) woodland - a small area of the Nords plantation is located in the south of the site. This area comprises a mixed plantation including pine, larch, spruce, sycamore and ash. There is evidence of recent woodland management, with piles of cut wood. The woodland appears to be frequently accessed by cattle, and poaching and trampling extends throughout the woodland area on site. Ground flora exists in very limited small patches, and includes bluebell and primrose, however the majority of the woodland floor is bare earth;
- Ponds - One pond is present within a heavily managed short improved grassland field at the south-eastern corner of the site. This pond is circular and approximately 10m wide with some rush at one corner, and a small patch of brooklime, but otherwise no marginal or aquatic vegetation. The pond has shallow sloping banks and is heavily overshadowed by a large overhanging willow, ash and bramble. A second pond is present on site, in the form of a shallow depression within a hedgerow. This pond is small, heavily overshadowed by willow scrub and shallow, with much leaf litter. No marginal vegetation is present and the pond is covered with blanketweed; and
- Adjacent Habitats - the site is surrounded by similar environments to those found on site, dominated by arable and improved grassland fields.

Initial Results and Assessment

Cirl bunting were recorded on site during the survey, as well as skylark and linnet. No further evidence of protected species or notable species was recorded during the survey; however, the site provides opportunities for bats, badgers, small mammals, nesting birds, reptiles and amphibians.

Several mature trees are present which provide opportunities for roosting bats. Large piles of rocks are present along the boundaries of the site provide hibernation opportunities for reptiles and amphibians.

Further surveys recommended comprise:

- bat activity surveys of the site (see below),
- daytime and emergence surveys of trees,
- breeding bird survey (including cirl bunting, sky lark and linnet),
- badger survey and
- reptile survey.

Recommendations for enhancement include:

- areas of wildflower grassland,
- pond creation and
- woodland edge planting.

Bat surveys

In recognition of the local potential for bats to use the site a series of bat activity surveys was undertaken between May and September 2014.

This survey highlighted that there is bat activity on site, including priority species of Greater Horseshoe and Barbastelle. The majority of recorded activity was commuting and foraging along hedgerow boundaries and the copse close to the south of the site.

As a result of the surveys it was recommended that hedgerows should be retained and enhanced where possible and sensitive lighting be considered within the developed areas.

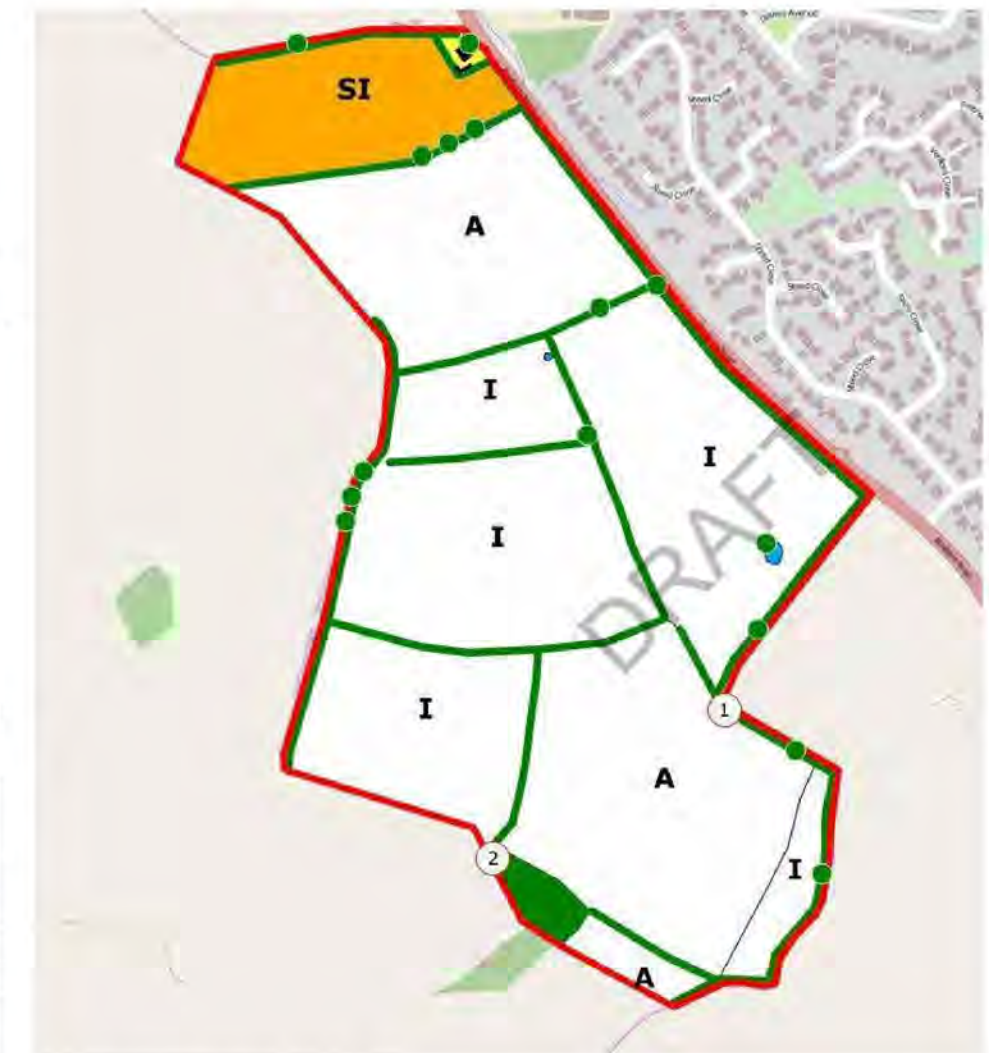
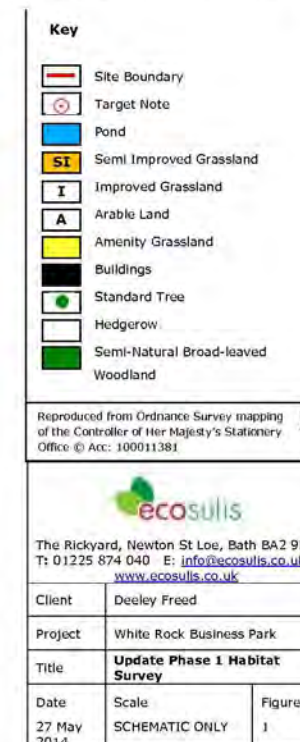


Fig. 18 Phase 1 Habitat Survey Plan

CONSIDERATION TO RECEPTORS

Designated Sites

Feature	Desk Study	Field Observations	Recommendations (Annex 3 details legislation and planning policy)?
Statutory designations on site	No designations are located within the site boundaries.	N/A	N/A
Statutory designations within 2km	<p>Saltern Cove SSSI 1.8km east of the site</p> <p>The site supports a diverse range of intertidal flora and fauna including communities characteristic of both sediment and rocky shores</p> <p>Sugar Loaf Hill and Saltern Cove LNR 1.8km east of the site</p>	The habitats on site do not provide similar opportunities to those associated with the SSSI and LNR.	Given the distance of the site to the designated sites, it is considered unlikely that the site proposals will directly affect the SSSI and LNR.
Statutory designations within 2.1km-5km	No designated sites are present within 5km of the site	N/A	N/A
<p><u>Key to abbreviations</u></p> <p>SSSI - Site of Special Scientific Interest</p> <p>LNR - Local Nature Reserve</p>			

Protected/Notable Species

Species/species groups	Existing Survey Information (2010)	Evidence of/suitability during update survey	Recommendations (Annex 3 details legislation and planning policy)
Flora	No rare flora was recorded on site during the surveys, but numerous bluebell plants were recorded within hedgerows and woodland patches across the site. The native bluebell is protected from sale under Schedule 8 of the Wildlife and Countryside Act 1981 (as amended), and are a UK BAP species, although not a priority species. The majority of the site comprises well-managed farmland, and frequent management and improvement limits the suitability of the site to support rare species. The hedgerow banks and woodland copses provide some less intensively managed areas that are likely to support a greater range and diversity of species than the surrounding fields, and have potential to support some more rare or notable species. No invasive species listed on Schedule 9 of the amended Wildlife and Countryside Act 1981 at the time of survey was noted on site; however, a detailed survey was not carried out.	No changes from existing survey information (2010). No notable species were recorded on site during the survey, and hedgerows are well-managed therefore limiting opportunities for notable species.	<p>Based on the existing outline proposals for the site, it is understood that proposed new woodland will be retained as well as existing woodland to the south of the site.</p> <p>The development is likely to affect approximately 1500m of hedgerow. It is recommended that hedgerows on site are retained and enhanced where possible with a buffer habitat where possible. The scheme must provide an ecological enhancement, therefore if hedgerows cannot be retained within the scheme then off-site mitigation should be considered. Where hedge lines are to be broken, consideration should be given to additional planting of native species to enhance the commuting and foraging potential for a wide range of species on the site.</p> <p>Landscape plans for the scheme should aim to incorporate native species where possible, as well as species of benefit to wildlife. Access into new woodland habitats should be restricted to minimise disturbance to these areas.</p>
Badger	No evidence of badger was noted on site. A single holed outlier sett and two large sett complexes have been previously recorded to the west of the site whilst habitats on site provide foraging opportunities including arable crops, pasture to provide	No changes from existing survey information (2010). No badger setts were recorded on site during the survey. The site continues to provide suitable foraging and commuting opportunities for	A single holed outlier sett and two large sett complexes are present to the west of the site, therefore it is recommended that a badger survey should be undertaken in advance of works

Species/species groups	Existing Survey Information (2010)	Evidence of/suitability during update survey	Recommendations (Annex 3 details legislation and planning policy)
	earthworms, and fruit within the hedgerows and copses.	badgers in combination with adjacent habitats.	commencing on site to check for any new sett excavations.
Bats	<p>Greater horseshoe have been recorded using the site for commuting and foraging. Four other species of bat (common pipistrelle, soprano pipistrelle, a long-eared species and Myotis species) were recorded on the development site, with an additional species (lesser horseshoe) recorded on the wider survey area. Activity was concentrated along hedgerows, although activity levels were relatively low considering the size of the site and suitable habitats present.</p> <p>Two houses are present just south of the farm buildings. These comprise two modern semi-detached rendered residential houses. Both are occupied and in a good state of repair. Small gardens with wooden and corrugated metal sheds and well managed amenity grassland and shrubs surround the houses. These buildings were not fully assessed due to the location of the buildings being outside the original development boundary, however a dawn swarming survey of the building was undertaken in 2013 and recorded no bats roosting within the buildings.</p>	<p>The site provides good habitats for a range of bat species, with well-established hedgerows providing good foraging and commuting routes, pasture and woodland providing good foraging habitat, and numerous large mature trees and buildings that may offer suitable roost sites.</p>	<p>The site provides good habitat for a range of bats species. It is recommended that horseshoe activity surveys are undertaken on site to identify any important foraging areas and commuting routes. The survey should be undertaken between April and October comprising two visits per month to assess the use of the site by horseshoe bats.</p> <p>It is recommended that an update dawn swarming survey of the buildings is undertaken prior to demolition to reassess their suitability for bats, and daytime and emergence surveys of trees to identify roost sites. This survey can only be undertaken when bats are active between May and August (surveys can be undertaken in September during suitable weather conditions).</p> <p>It is recommended that a habitat suitability assessment of any trees proposed for removal is undertaken to fully assess their suitability to support bat roosts prior to felling.</p> <p>Lighting during construction will be avoided wherever possible. Where unavoidable, consultation with an ecologist will be undertaken and directional lighting will be used wherever practicable during construction will be avoided wherever possible. Where</p>

Species/species groups	Existing Survey Information (2010)	Evidence of/suitability during update survey	Recommendations (Annex 3 details legislation and planning policy)
			<p>unavoidable, consultation with an ecologist will be undertaken and directional lighting will be used wherever practicable during construction works, particularly near to features such as woodland edge, hedgerows and mature trees, in order to avoid disturbance to foraging and commuting bats.</p> <p>The outline proposals for the site indicate that existing hedgerows would be surrounded by residential properties. The retention of these hedgerows would provide suitable foraging opportunities for light-tolerant bat species however opportunities for light-sensitive species such as horseshoe bats are likely to be lost. The scheme would therefore have to provide suitable alternative habitat for horseshoe bats within the local area, with consideration to off-site mitigation including enhancements to hedgerows or new hedgerow creation.</p> <p>New roosting opportunities will be provided throughout the development, with bat roosting features such as bricks or tiles provided within buildings, and bat boxes on mature trees within the woodlands.</p>
Dormice	The site provides limited suitability for dormice, with a network of well-managed hedgerows and some small patches of woodland. Many of the hedgerows on site contain hazel. Although the woodland patches on site are too small to be optimum	No changes from existing survey information (2010). The hedgerows on site continue to be well-managed therefore providing limited opportunities for dormice. No woodland is present on site.	A number of hedgerows and woodland habitats on site provide suitable habitat for dormice, with the most suitable habitat located adjacent to the western site boundary. Surveys in 2010 recorded no evidence of dormouse activity in the area, and conditions on site have not

Species/species groups	Existing Survey Information (2010)	Evidence of/suitability during update survey	Recommendations (Annex 3 details legislation and planning policy)
	habitat for dormice, there is good connectivity within the surrounding landscape to other woodland patches. No dormouse were recorded during dormouse surveys in 2010.		changed significantly since these surveys were undertaken. It is therefore considered likely that existing survey information for the site is still valid. It is recommended that hedgerows are retained and enhanced within the scheme where possible. Consideration to new hedgerow planting should also be included within the proposals to maintain and enhance connectivity and opportunities for dormice in the local area. Consideration should be given to planting fruit/nut bearing species within the landscape plans.
Other small mammals	The woodlands, hedgerows and semi improved grassland habitats provide suitable foraging and refuge opportunities for small mammals, including hedgehog.	No changes from existing survey information (2010). The site continues to provide suitable opportunities for small mammals on site.	If hedgerows and semi-improved grassland are proposed for removal, works should avoid hibernation season (November to February) and be supervised by an Ecological Clerk of Works. Consideration should be given to enhancing opportunities for small mammals on site through appropriate planting schemes and long-term management.
Birds	A good population of breeding birds, including Birds of Conservation Concern (BOCC) and UK BAP and Devon BAP species are present on the site, mainly utilizing the hedgerows and adjacent arable areas	The site provides good habitat for a range of bird species, especially those associated with farmland habitats, many of which are declining and are Birds of Conservation Concern (BOCC). A range of birds were noted on site	It is recommended that additional breeding bird surveys are undertaken on site, specifically Cirl bunting surveys. Cirl bunting have been confirmed on site during the extended Phase 1 habitat survey. The Cirl bunting surveys require five visits by a suitably experienced

Species/species groups	Existing Survey Information (2010)	Evidence of/suitability during update survey	Recommendations (Annex 3 details legislation and planning policy)
	Two cirl bunting (Schedule 1) territories have been recorded on the development site, although intensive survey may record additional territories. There is a good range of similar suitable habitat within the district and in the wider survey area to the south, although no breeding cirl bunting were recorded within the wider survey area to the south, possibly due to more intensive management of hedgerows within this area	during the surveys including more common species such as blackbird and robin as well as some more notable species including skylark and linnet, which are both Red-listed BOCC. A pair of Cirl bunting were recorded on site during the Phase 1 survey.	ecologist during Mid-April and August, in accordance with recent RSPB guidelines. Whilst some hedgerows may be retained within the development zone, it is considered unlikely that breeding Cirl buntings will continue using these hedgerows due to an increase in disturbance levels. Therefore, alternative mitigation would need to be incorporated into the proposals to provide alternative provision for Cirl bunting. This could comprise off-site mitigation, including new planting and hedgerow network enhancements.
Reptiles	A low population of slow worm were recorded within the zone of development (on-site). Common species of reptiles, including slow worm, are protected and have recently been added to the UK BAP list of priority species, However this species is relatively common and the numbers recorded on site are low with a good range of similar suitable habitat in the surrounding area	The site provides suitable habitat for reptiles, outside of the intensively managed arable areas. Field edges, pasture, semi-improved grassland, hedgerows and woodland provide good foraging, refuge and hibernation habitat for common reptiles, including slow worm, grass snake and common lizard. Two large piles of stones were noted on site providing additional hibernation opportunities for reptiles (Target Note 1 and Target Note 2, Figure 1).	The site provides good habitat for reptiles, especially within semi-improved grassland habitats. Given that the existing semi-improved grassland is located within land proposed for the planting of Rock Knoll Copse, a survey for reptiles is considered necessary to identify species that may be using the site and the extent of that use, and to give an estimate of population size in order to fully assess the impacts on these species and inform mitigation proposals. A reptile presence absence survey would involve one visit to lay refugia, targeted within areas of the most suitable habitat, which should be left for a week to settle; and a minimum of seven further visits to check these refugia would follow. The optimal survey period is April, May and September but subject to weather conditions, these surveys can be undertaken between March and October

Species/species groups	Existing Survey Information (2010)	Evidence of/suitability during update survey	Recommendations (Annex 3 details legislation and planning policy)
Amphibians	The two ponds located on site provide some limited suitable habitat for amphibians but are considered sub-optimal for the protected great crested newt, due to their lack of aquatic vegetation suitable for foraging and egg-laying, and due to their isolation from other suitable ponds and suitable terrestrial habitats within an intensively farmed area. Pond habitats provide suitable opportunities for common amphibians. No further ponds are located within 500m of the site.	No changes from existing survey information (2010). The ponds on site were dry during the survey, further limiting opportunities for reptiles.	Given the low suitability of the ponds on site, no further surveys are recommended. However it is recommended that vegetation removal is undertaken outside of hibernation (September – March). Where not possible, it is recommended that a Precautionary Method of Working document is compiled with the inclusion of an Ecological Clerk of Works to oversee any vegetation removal.
Invertebrates	One Red Data Book (RDB) 3 species, chestnut pigmy moth, was recorded on the development site, however this species is thought to be under-recorded in Britain. Two Local species were also recorded, and are well-recorded within the area, although one of these, the great green bush-cricket is a Devon BAP species. The survey only recorded species present in September, and the site is suitable for other rare and UK BAP species	The site has suitability to support invertebrates. The farmed nature of the site with frequent agricultural inputs, especially within the more intensively managed arable areas of the site, is likely to limit the suitability of some areas of the site for invertebrates, however less intensively managed areas, such as the semi-improved grassland, hedgerows and woodland provide suitable habitat for more notable species.	Planting adjacent to existing woodland and hedgerow habitats will increase colonisation by invertebrates, as well as ground flora. New woodland habitats will incorporate rides and clearings into the layout in order to provide habitat for a wide range of species.

EVALUATION

Component habitat	Ecological attributes (referring to Ratcliffe criteria, 1977; Annex 4 gives the criteria)	Status (UK BAP/LBAP, legal)	Associated receptors	Overall Value (IEEM, 2006; Annex 5 gives the criteria)
Buildings	None	N/A	Bats and nesting birds	Site
Semi – improved grassland	Naturalness	N/A	Bats, badgers, nesting birds and reptiles	Local
Improved grassland	Naturalness	N/A	Bats, badgers, nesting birds and reptiles	Local
Arable	Naturalness	N/A	Bats, badgers, nesting birds and reptiles	Local
Hedgerow	Naturalness	N/A	Bats, badgers, nesting birds and reptiles	District
Semi-natural broadleaved woodland (mixed)	Naturalness	N/A	Bats, badgers, nesting birds and reptiles	District
Ponds	Naturalness	N/A	Bats, badgers, nesting birds and reptiles	Site

4 | Baseline Summary

The baseline detail presented within this Study has set out the current situation on site.

Through this baseline study, a series of opportunities and constraints have been identified for each technical discipline.

Landscape	<p><i>Constraints</i></p> <p>Distant views into the site from areas of high ground on the western side of the River Dart represent the primary landscape constraint, albeit there are opportunities to mitigate this.</p> <p><i>Opportunities</i></p> <p>Structure planting design would improve distant views of the urban edge from high ground on the western side of the River Dart.</p> <p>Screening/ mitigation opportunities as presented within the baseline above; these opportunities can be integrated within the initial concept plan from an early stage.</p>
Ecology	<p><i>Constraints</i></p> <p>Surveys identified Cirl bunting on site along with skylark and linnet. Bat surveys have recorded foraging and commuting bats.</p> <p>A site visit noted the potential opportunities for bats, badgers, small mammals, nesting birds, reptiles and amphibians.</p> <p>Several mature trees are present which provide opportunities for roosting bats.</p> <p>Large piles of rocks are present along the boundaries of the site provide hibernation opportunities for reptiles and amphibians.</p> <p><i>Opportunities</i></p> <p>Assessment has identified the opportunity to improve ecological capacity, including:</p> <ul style="list-style-type: none"> • areas of wildflower grassland, • retention/enhancement of hedgerows and inclusion of dark corridors to support bats; • pond creation and • woodland edge planting <p>These are considered to also provide opportunities to enhance/provide mitigation in relation to landscaping along with broadly adding marketable value to the development.</p>

Highways	<p><i>Constraints</i></p> <p>The existing alignment and capacity of Brixham Road presents limited/no ability to serve development at White Rock 2 at the scale envisaged to meet the desire to provide a natural extension to White Rock 1.</p> <p><i>Opportunities</i></p> <p>Torbay Council have published aspirations and plans to deliver strategic improvements to the highway network and, specific to White Rock 2, the Brixham Road corridor.</p>
Town Planning	<p><i>Constraints</i></p> <p>Requirement for countryside access under Policy C1 - see below.</p> <p>No formal site allocation - see below.</p> <p><i>Opportunities</i></p> <p>Sustainable location with broad Strategic Delivery Area (3.5).</p> <p>Opportunity to use the need for countryside access to positively inform onsite placemaking.</p> <p>Recognition that White Rock 1 will be a Local Centre; potential to form a future District Centre if combined with wider area, including White Rock 2.</p> <p>Recognition by Torbay Council that the site has potential, subject to addressing potential landscape and ecology constraints.</p>
Topography	<p><i>Constraints</i></p> <p>The existing topographical survey dates from 1994 and it is considered likely that the topographic profile will have changed in this time. Technical updates prepared for this baseline identify that there were indicated level discrepancies of around 1m noted during work on the Western Bowl for White Rock1.</p> <p>A new topographical survey of the site has been recommended.</p> <p><i>Opportunities</i></p> <p>Further detail on the potential opportunities is largely dependent on a new survey. However there are initial opportunities for the development form to take account of the existing landform, namely the ridgeline on the eastern side of the site and the land falling away to the west.</p>
Archaeology	<p><i>Constraints</i></p> <p>Evidence of former quarrying (north of site), flint scatter and Marl pit.</p> <p><i>Opportunities</i></p> <p>Limited number of finds within main development area; the above finds located to edges.</p>

5 | Development Concepts

In response to the baseline presented up to this point, the Development Concepts presented on the following pages demonstrate the design process followed to date.

They are based on clear design principles, informed by the baseline environment, both the existing development pattern east of Brixham Road and the emerging development at White Rock 1.

Section 5.1 presents the Initial Options developed through the design process. Each Option responds to the opportunities and constraints of the site and surroundings but does so in a variety of manners.

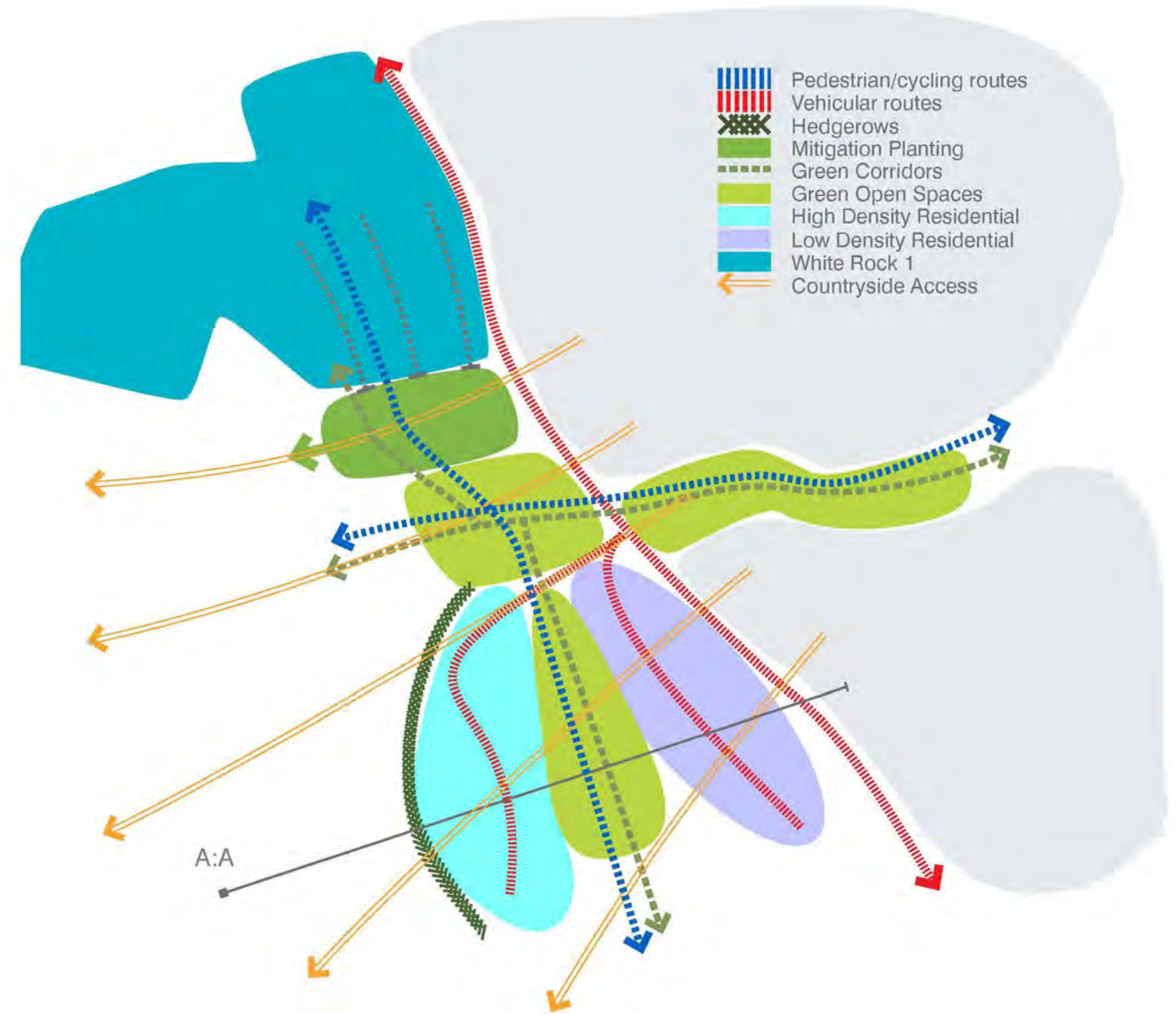
For each Option, we have considered three key matters:

- Pedestrian and cycling routes;
- Vehicular access routes; and
- Hedgerows, both existing and proposed.

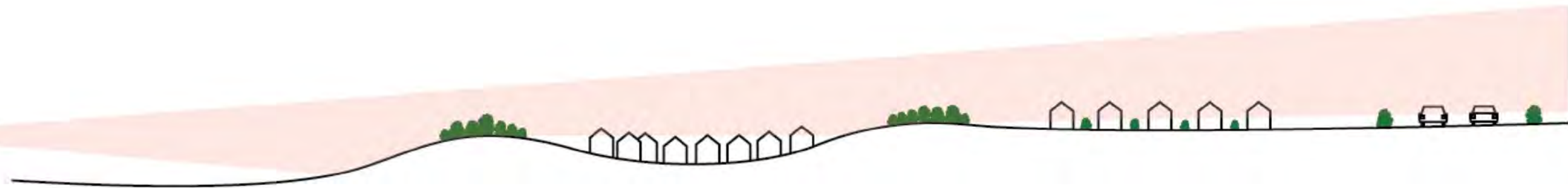
These matters are considered to be central to the design of a scheme which makes best use of the site and its opportunities whilst ensuring a positive legacy for the existing settlement. Furthermore, the focus on pedestrian and cycling routes and hedgerows ensures that the development is able to respond to the need to promote access to the open countryside to the west and to ensure that there are opportunities to protect ecology on the site.

For each Initial Option we have presented a high level consideration of the pros and cons.

Section 5.2 gives further consideration to the Design Principles, applying these to the emerging preferred development option.



A:A



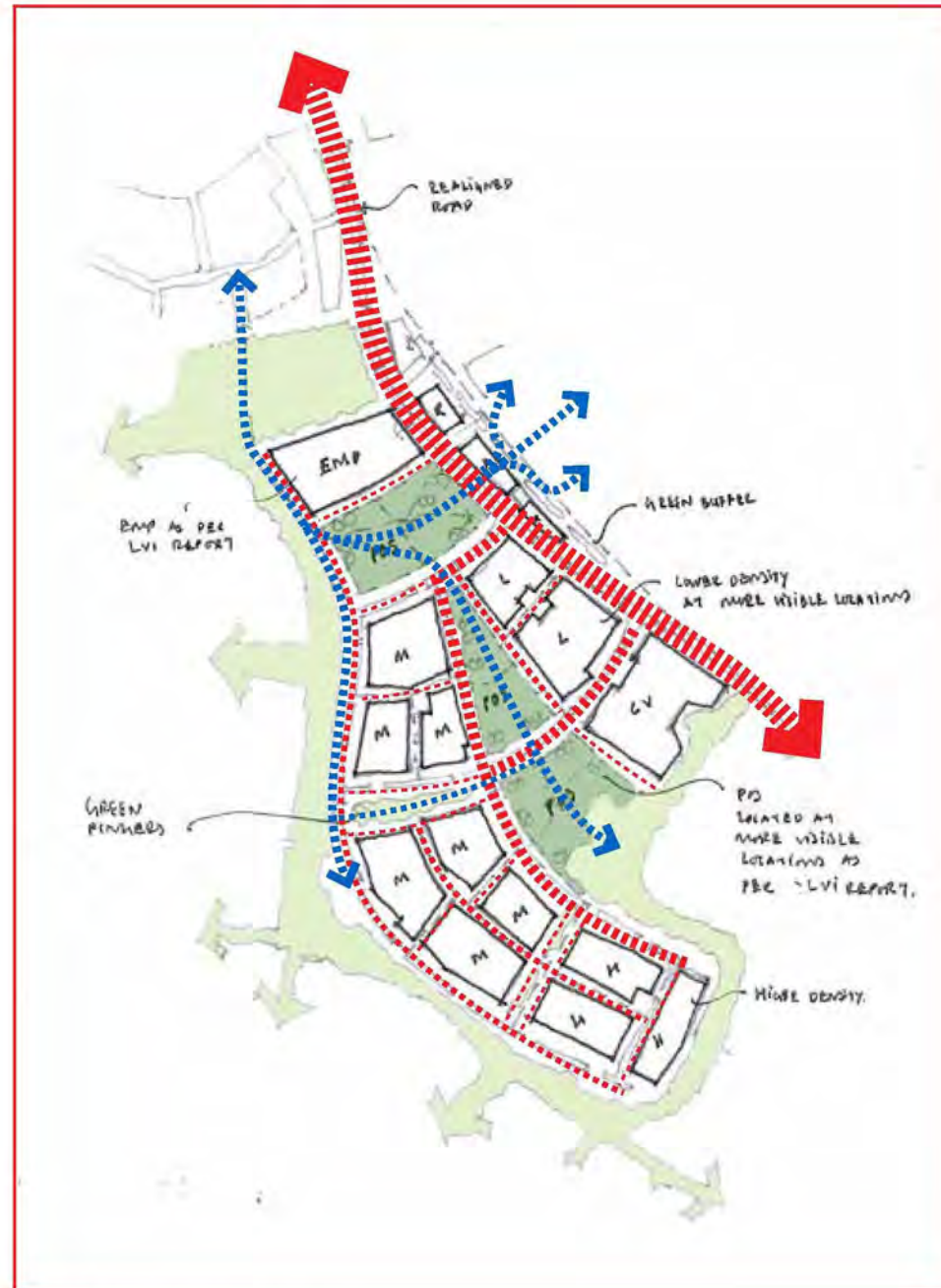
5.1 Initial Options



Option 1:

Pros: Development concentrated in a single 'sweep'; strong East/West links from existing development to open countryside.

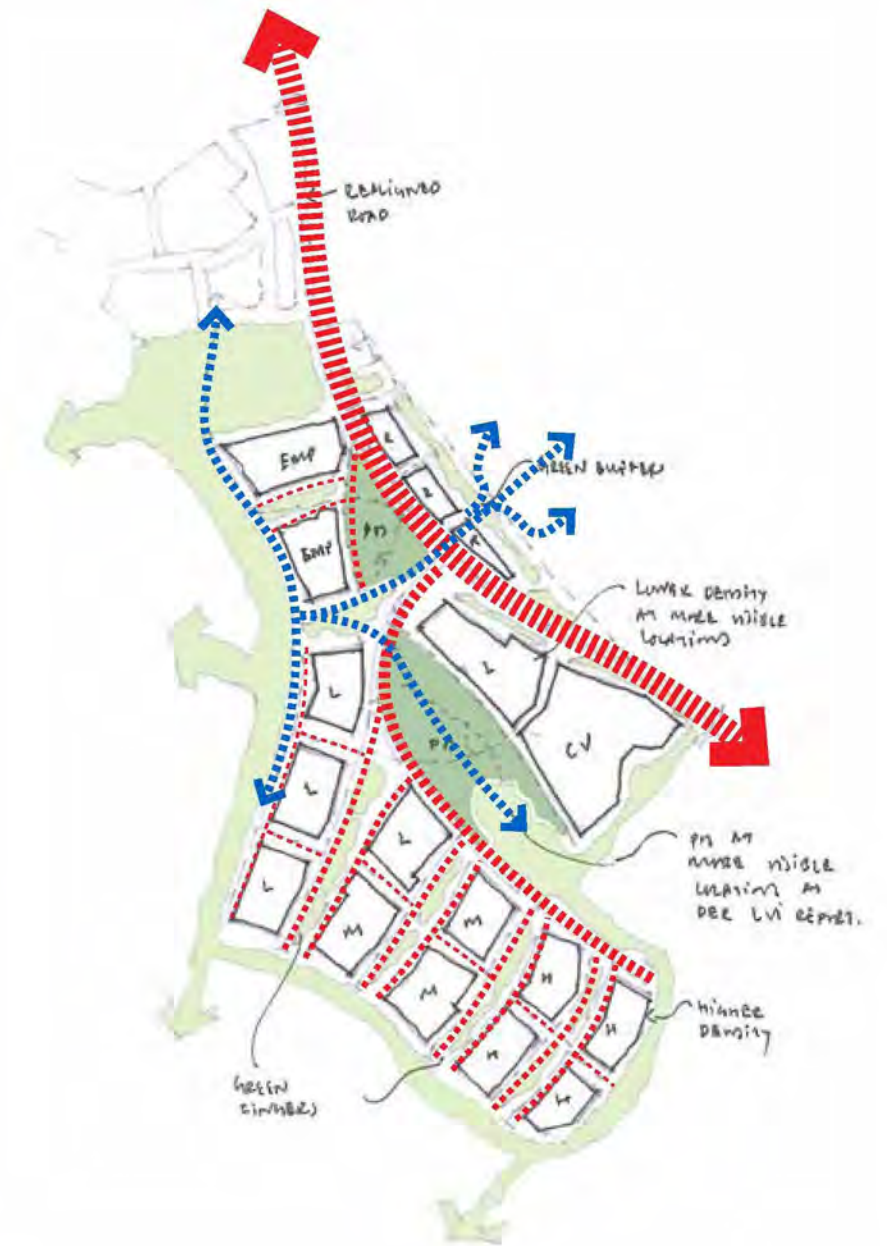
Cons: Potential for vehicle routes to be used to 'loop' around the development; introduces main vehicle route to western boundary; open space fragmented; development could hinder scope for ecology improvements.



Option 2: (Preferred Option)

Pros: Public Open Space, with ecological benefits, central to the site (running N/S & E/W); open space traversing the site provides links to open countryside beyond; reduced prominence for vehicle routes.

Cons: Employment space to north is a barrier between open space/woodland.



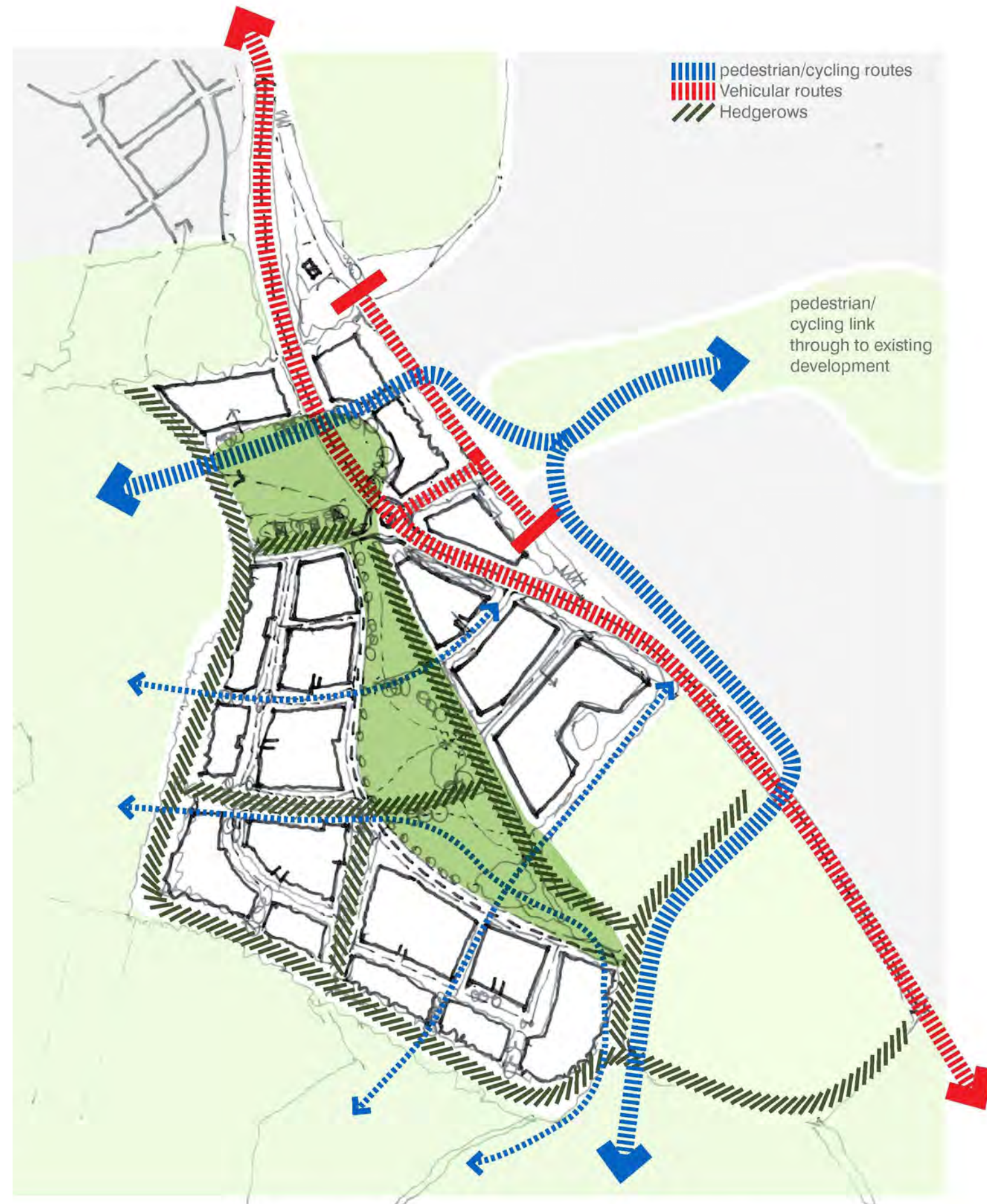
Option 3:

Pros: Reasonably good open space/ecology links; single main vehicle route through site; more open development pattern.

Cons: Employment space limits 'flow' of open space/habitat creation; reduced ability to access countryside from existing development.

5.2 Design Principles

- **Movement** – strong focus on pedestrian and cycle routes both within the site and linking to the existing development east of Brixham Road and at White Rock 1.
- **Landscape** – strong boundary treatment to screen the site from sensitive view points, particularly from the South Devon AONB.
- **Public Open Space** – focus on provision within central area of the site. This serves to break and open up the density of the development along with ensuring ease of access to open space from all points within the site.
- **Ecology** – open space which incorporates water features (where appropriate; further testing is required), the retention of existing hedgerows and creation of new ones, along with 'green fingers' breaking up the built form all serve the purpose of retaining habitat connectivity through the site to the open countryside beyond.
- **Countryside Access** – the site layout is such that there a number of possible countryside access points in order to ensure retained and enhanced access opportunities. Specific access is provided within the open space in the north of the site which also provides woodland access to the White Rock 1 development.
- **Highway Design** – initial highway design work follows the emerging preference of the Council to see a dual carriageway to ease congestion and improve capacity of the Brixham Road. Further detailed design work, including on the type of junction, will be required.



6 | Development Proposals

This section presents the General Concept Development Plans for the future development of the White Rock 2 site, based on the preferred option which emerged from the Development Concept work.

In response to the Development Concepts explored in the previous section, the image on the right presents the current Preferred Option for development of the site.

This option, presented in greater detail later in this section, is directly informed by the baseline presented in this Study, along with those matters which have been considered in greater detail. These are:

- emerging ecology data, specifically relating to hedgerow enhancement and management and Greater Horseshoe Bats;
- landscape and visual impact work which has directed development on the site to areas which will ensure that there is limited impact on views from the AONB;
- initial highway design options for site access and to incorporate improvements to Brixham Road; and
- matters relating to site topography and drainage.

These matters have played a central role in the emerging concept, largely in recognition of the Council's view (and the 1997 Secretary of State decision) that they must be addressed in any future development.

As presented, work to understand possible landscape and visual impacts was prepared to understand the opportunities and constraints of the site.

These have provided a design framework within which to work and have steered development, and the relative densities of this, to particular areas within the site.

With regard to ecology, survey work has been ongoing in order to establish an accurate baseline, recognising the potential of the site to host certain protected species and the need to avoid and mitigate for any potential impact on them.

Finally, a significant influence on the development of the emerging Preferred Option has been ensuring that direct linkages are created between both the White Rock 1 development to the north and the existing built form located east of Brixham Road.

Central to this has been the aim of securing green linkages which run both between the two sites and also through the southern site. The purpose of these links are to provide for ecological mitigation and enhancement opportunities along with beginning to develop a scheme which provides for Countryside Access for local residents, in accordance with emerging Policy C1 of the emerging Torbay Local Plan.

Through the consideration of all of the above, and with their respective opportunities and constraints informing the design process, we have ensured that placemaking principles have been central to our work and the emerging Preferred Option.

Variations on the Preferred Option

As part of the development process leading to the Preferred Option alternative development options have been considered, all of which are informed by the same baseline and conform to the Design Principles set out in Section 5. The options are presented on the following page.



6.1 Dismissed Options

The schemes below present two options for the site, one (on the left) which includes a 120 bed care village on the eastern edge and the second (on the right) where the care home is omitted and the land is used for residential development. The total number of residential units within these options is 293 and 328 respectively.

Both options include approximately 4,000 sq m of employment/retail space. This is located in the northern portion of the site across two parcels of land. The first in

the north west, immediately south of the woodland which separates White Rock 1 and 2, and the second in the area between the original and the realigned route of Brixham Road.

Both options include extensive landscaped boundary treatment along with open space both within and on the boundary of the site, serving a number of uses.

The first of these is to provide a strong boundary treatment which seeks to reduce the visual impact of the development and secondly to provide an attractive public realm, both within and on the western edge of the site, the latter providing positive opportunities for countryside access.

Finally, there are ecological benefits, particularly for commuting and foraging bats where corridors are kept dark.

We have dismissed these options on the basis that the northern employment space appears to stand alone from the core of the development and critically limits the potential to provide a strong landscape planting/ecological buffer between White Rock 1 and 2.

Furthermore, the Care Village element has been dismissed at this stage as it is considered that the site is best able to support a mixed-use residential development.



6.2 Preferred Option

The Preferred Option draws on and retains the positive aspects of the previous design iterations, and includes:

- Residential and Employment Development in addition to a central area of public open space.
- No employment space to the north west of the site in order to maintain a strong landscape/ecology buffer between White Rock 1 and 2.
- Higher density development located to west and south of the site inline with the findings of the landscape impact study.
- Strong public access links to White Rock 1 to the north via woodland belt.
- Strong boundary treatment with potential to act as 'dark corridor' to support Greater Horseshoe Bats.
- Green links throughout the development to promote countryside access from the site and existing development east of Brixham Road.
- Employment development centred on new access junction.
- Positive performance against key emerging Torbay Council planning policy, particularly SDP3/3.5 and C1.
- 328 dwellings and approximately 3-3,500 sq m employment/retail development

In addition, whilst the land is outside of our clients ownership, we have indicated how in broad terms a second phase of development could be extended south towards Windy Corner.

This follows the same design principles as the Preferred Option and shows two areas of residential development (brown) and a further area of public open space (green) in addition to a potential location for additional vehicular access. The extension of boundary treatment around the additional area is shown in order to follow the principles in the Preferred Option of supporting countryside access and ecological benefits.



7 | Visual Impact

Preferred Option - Visual Impact

The emerging preferred option has been prepared as a 3D model in order to understand the potential impact on the landscape.

Testing of the potential impact on the landscape has been carried out at this stage in recognition of the Council's potential concerns about landscape impacts arising from further development at White Rock.

The exercise presented here is in direct response to the Council's acknowledgement, on submission of the draft Local Plan for examination, that they "would not object to the inclusion of [White Rock 2]...so long as Abacus properties showed that landscape (including cross boundary) and biodiversity issues (including LEMP) could be addressed".

In order to ensure a consistent approach, we have opted to model the development using those viewpoints previously used; for greater detail on these please refer to the Landscape and Visual Impact section earlier in this document. However, in recognition of the stage of the project in the development process, we have not modelled the impacts of the development from every viewpoint. Instead we have considered those viewpoints which have the potential to give rise to the greatest impact and used those. For ease of reference we re-present the locations of the viewpoints on the adjacent plan (without those unused viewpoints).

The montages which are presented on the following pages are based on the emerging development concept presented above and are based on a standard house type. Boundary vegetation treatment is shown at 10 years post development in order to ensure that the views are representative of the longer term impact.

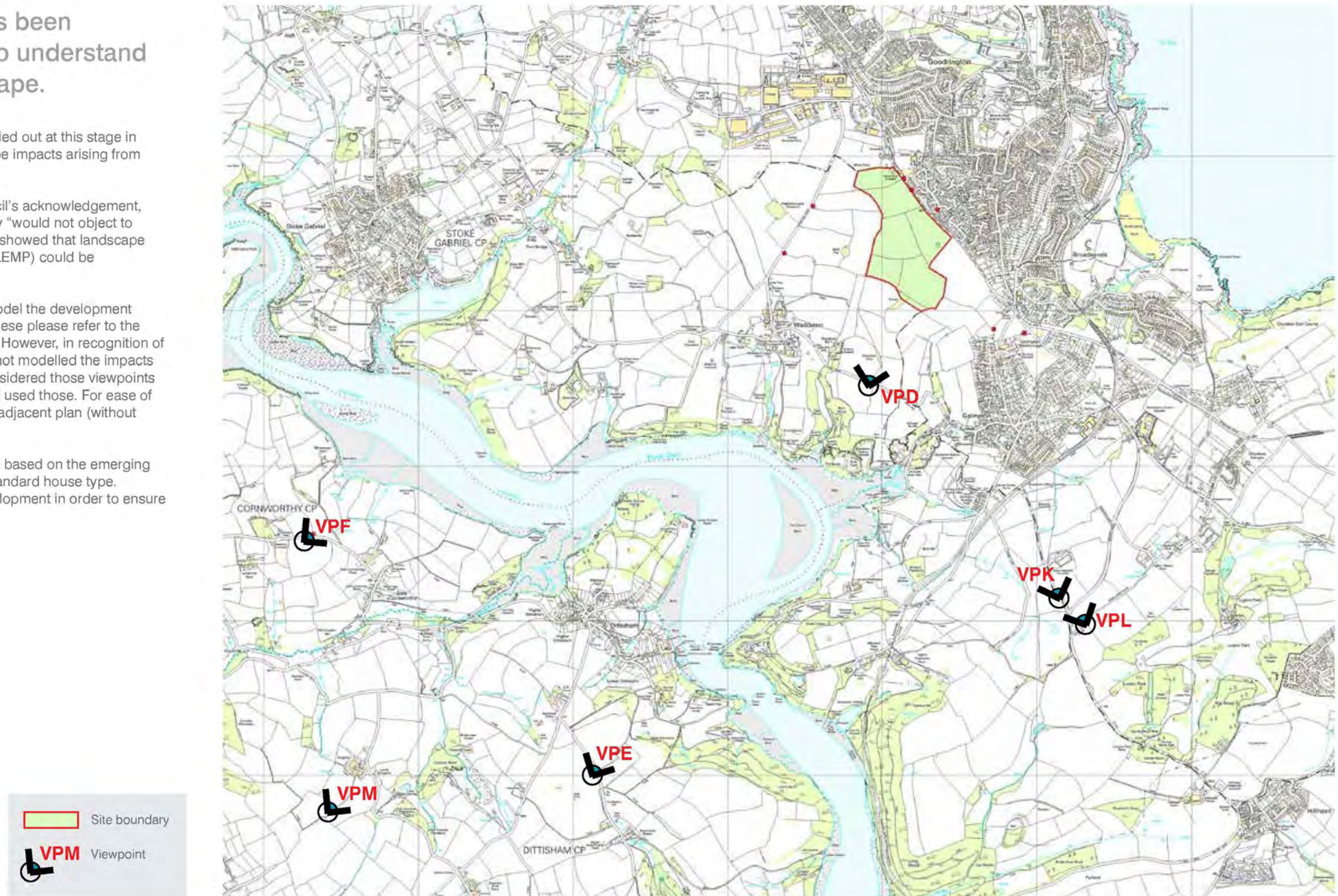


Fig. 19 Viewpoint Locations

Viewpoint D: Waddeton Rd

Before:



After:



White Rock 1
White Rock 2

Viewpoint E: North East from Fire Beacon Hill

Before:



After:



White Rock 1
White Rock 2

Viewpoint F: Cornworthy Rd

Before:



After:



White Rock 1
White Rock 2



Viewpoint K: Minor road near Alston

Before:



After:



White Rock 1
White Rock 2

Viewpoint L: John Musgrave Heritage Trail

Before:



After:



White Rock 1
White Rock 2



Viewpoint M: Bridleway Capton

Before:



After:



White Rock 1
White Rock 2



8 | Conclusion

This Study has presented a comprehensive update on work to consider the future development of land south of White Rock.

The work undertaken has demonstrated that whilst there are some site constraints, there is clear potential for development to take place, subject to the preparation of a scheme within the identified parameters.

Each technical discipline involved in the project has provided their own specialist input to this Study and critically appraised the development concept as it has evolved. It is their view that, subject to the proposed Further Studies outlined on the right, the concept provides a robust basis on which to further develop the preparation of a formal development proposal.

At this stage, and as highlighted in this study, the main parameters which should influence the emerging design are considered primarily to relate to landscape, transport impact/access and ecology. Each of these has also been raised by Torbay Council through the preparation and initial examination of the new Local Plan as matters which must be considered in future development proposals in general.

The emerging development concept presented has evolved in response to the initial baseline studies and the opportunities and constraints which have been identified. It is our view that the current development concept begins to address the primary matters of impact on landscape, traffic/access and ecology.

Specifically, in relation to landscape impacts, the montages prepared demonstrate that there is capacity within the landscape to absorb further development at White Rock; this is notable in particular in long range views from the west of the Dart Estuary and views from the AONB into the site. Furthermore, the bat survey work conducted between May and September 2014 has identified that whilst priority species have been recorded as present on site, this can be mitigated for within the development area through the retention of hedgerows and creation of dark corridors, elements which would also have a positive impact on the development in general.

Timescales for development

This study has evolved as the baseline has been prepared and as opportunities and constraints have been identified. At the time of writing (December 2014) the Study has been approved by the Client to be formally submitted to the examination of the new Torbay Local Plan.

In submitting the study, we are able to provide the necessary comfort that the site is available and suitable for development of a mixed-use development. Specifically, we consider that the single landowner, the proven track record of the delivery of mixed-use development at White Rock 1 and the established technical baseline all indicates that the site is deliverable within the context of paragraph 47 of the NPPF, to meet the need for developable land within the Paignton, and wider Torbay area, to provide for future objectively assessed needs.

Further Studies

Of those technical areas considered within this report, the following areas have been identified as requiring further study in order to inform refinement of the preferred option for development:

Highways	The preparation of a Transport Assessment, prepared in line with Department for Transport's Guidance on Transport Assessments. Detailed matters to consider are presented within the Baseline above.
Ecology	Further surveys recommended, comprising: <ul style="list-style-type: none"> • daytime and emergence surveys of trees; • breeding bird survey (including civil bunting, sky lark and linnet); • badger survey; and, • reptile survey.
Topography	An updated topographical survey.
Drainage	A detailed Ground Investigation to determine ground make-up and identify local aquifers. The investigation should include infiltration tests to determine the suitability of soakaways for the surface water drainage. Discussions with South West Water will be required to determine if existing gravity sewer outfalls to a pumping station off Brixham Road has capacity for the proposed development.
Masterplanning & Urban Design	Further refinement of the emerging development concept, taking account of the above further studies. Detailed assessment of site capacity and appropriate densities. Consideration of matters emerging from the Torbay Local Plan examination.
Landscape	Development of landscape concept on and off site. Link to Countryside Access (provided by White Rock 1).

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Torbay Local Plan

Proposed Modifications Consultation Response

Abacus

Stride Treglown job no.	15108
Prepared by	MH
Checked by	GKS
Date	March 2015
Revision	ISSUE