I wish to highlight the importance of Not Building the Inglewood Development at this present location.

The most important reason in my mind is based on the grounds of Health & Safety. Brixham has a very busy working harbour. It is recorded to bring in the highest value catches in the UK. Following Brexit the fishing fleet will be expanding considerably in the next 5 years. The emergency services need to be able to reach them quickly.

Fishing is a dangerous industry, which we need to support and to ensure the health & safety for our fishermen and those that process the fish at the Brixham end of Torbay. Also to protect the residents living here and in the adjacent satellite areas that form part of the Brixham Peninsula i.e. Churston & Galmpton.

Brixham Hospital does not even have a minor injuries department anymore as that was closed in the last few years. It now makes it essential for accident cases to be transferred by road to Torbay Hospital. Building the Inglewood development on this particular site will considerably impact on the time it takes the emergency services to get to and from Brixham. This fact is very important if lives are to be saved because of the additional road usage at this proposed location.

There is only one road in and out. Bascombe Road cannot realistically be counted as this road is narrow and has a historical bridge that prevents the road from being widened at this point. This road was also reduced in width a few years ago by Torbay Council so as to reduce the flow of traffic and the speed of vehicles and to cater for the increased safety of walkers and cyclists. This road is a Torbay preferred cycling route to Brixham, it is deemed to be safer for them than using the main road. The number of vehicles increases on this road if there is any stoppage or increased congestion on the main Dartmouth-Brixham road. Creating a rat-run defeats the object of increasing road safety for walkers and cyclists if Inglewood goes ahead.

It is also a fact that most people do not necessarily live and work in the same area. This point was raised by the developer when he gave a presentation at White-Rock in 2015. I was at this time a Torbay Councillor and specifically went to all of the meetings which Councillors and the Public could attend.

Most Torbay people have to commute out of Torbay to find work as there is not the work available locally to support the existing community. A housing development such as the one at Inglewood I believe is in the wrong location and if such a development is required, which is doubtful. Surely it makes more sense to build this development on the other end of the ring road nearer the exit from Torbay.
This would make it more commutable and it would reduce the impact of further congestion to the Brixham end of Torbay.

The location of the proposed Inglewood Development is in an area of Outstanding Natural Beauty. It is important for both the protected Cirl Buntings and the Greater Horseshoe Bats. The Greater Horseshoe bat has the same level of environmental protection as the Giant Panda and this area feeds the largest breeding colony in Western Europe.

The incidence of Greater Horseshoe Bat and Cirl Bunting were major reasons for the refusal of a large housing development application for the first and eighteenth holes at Churston Golf Club in 2017.

It is believed that even if the developer plants hedges and adds subdued lighting, the proposed location of the Inglewood development will be detrimental to the survival of this protected species as it was with the previous application at Churston Golf Club.

By nature Greater Horseshoe bats are shy and light sensitive creatures. The lighting and noise from houses, street lights and vehicles not to mention the noise from the inhabitants will all contribute to deter the bats from accessing their main feeding grounds.

Lastly, in the Brixham Peninsula Local Plan there are more houses allocated at a number of locations than the number of houses the Inglewood housing development provides. The Neighbourhood Plan ensures the 5 year housing supply has been exceeded for the Brixham end of Torbay and was created to the specific requirements of Torbay Council.

It appears that Torbay Council Planners may have arbitrarily stated that there is now a less that 3 year supply of housing. There appears no justification for this and I would ask the inspector to question this contention and the competence of any calculations. The fact is that the Brixham end of the bay DOES have sufficient housing allocation, any shortfall should be at the Torquay end of the bay to reduce the effect of additional congestion from Brixham right across Torbay.

In the BPNP the allocation of new houses are spread out at a No. of different sites. They will not hugely impact one specific area of road as the proposed Inglewood development would.

Having Inglewood Development at this location will be detrimental on grounds of Health & Safety and the adverse Ecological effect on the protected wildlife of this area for many years to come.

I appeal to the Inspector to apply common sense to protect this area of Outstanding Natural Beauty and to ensure the Health and Safety of our Brixham Fishing Community and its local residents.

Diane Swindells – Churston Resident

Previously

Diane Stubley
Previously Councillor Stubley for Churston, Galmpton & Broadsands.

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Legal Protection of Greater Horseshoe Bats:-

Common name: Greater horseshoe bat
Scientific name: *Rhinolophus ferrumequinum*

Description

The greater horseshoe bat is a relatively large species by British standards (forearm: 51-59 mm; head and body: 56-68 mm; wingspan: 360 mm; weight: 13-34 g), with medium to light brown fur (often greyer and paler on the animals underside), a horseshoe nose-leaf and long legs (with which it hangs from its roost, often with its wing wrapped around its body).

It occurs in woodland, scrubland and grassland, particularly near to water. Its food consists of a wide variety of insects (usually large), caught either in woodland or by flying low over old pasture. During the summer it generally roosts in old buildings with large roof spaces (and large entrances), but can be found in caves and mines; in the winter however, most move into caves, mines, cellars and other humid underground sites to hibernate.

Mating occurs in the autumn, when males occupy mating roosts (often occupying the same roosts for may years) where they are visited by females for mating. maternity colonies are then formed in the summer, within which the bats may remain active throughout the day, but only going out to feed at night.

Legal Protection

- Greater horseshoe bats appear in Appendix II of the Berne Convention (Convention on the Conservation of European Wildlife and Natural Habitats). This requires that they be strictly protected against deliberate killing, capture, damage/destruction of breeding and nesting sites, disturbance, trading (including parts and derivatives), etc.
- They are also appear in Appendix II of the Bonn Convention on the Conservation of Migratory Species of Wild Animals, under which signatories are encouraged to draw up agreements to restore/maintain species' conservation status through management and other appropriate measures.
- Greater horseshoe bats are also protected under Annexes II and IV of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. These cover species of community interest the conservation of which requires the designation of Special Areas of Conservation (SACs); and species that are in need of strict protection respectively. Damage or destruction of breeding sites or resting places is prohibited, and all life stages are protected against deliberate capture, killing

or disturbance in the wild; and keeping, transport, sale/exchange and offering for sale/exchange of specimens.
- Under domestic legislation, greater horseshoe bats are covered by the Wildlife and Countryside Act 1981 (as amended). Under Schedule 5 the deliberate killing, injuring, taking, possessing, disturbing and selling (including parts and derivatives) as well as damaging, destroying or obstructing any structure or place of refuge etc are prohibited. Under Schedule 6, certain methods of killing or taking animals are specifically prohibited, and even humane trapping for research requires a licence.

Current Status

The greater horseshoe bat population of northern Europe has declined significantly over the last 100 years (an estimated decline of 90%), such that the UK population is now restricted to south west England and Wales (although occasional specimens are recorded elsewhere). There are currently 35 recognised maternity (and all year) roosts and 369 hibernation roosts in the country, with the population estimated to be between 4,000 and 6,600 individuals. Internationally, the greater horseshoe bat occurs throughout the area between the Atlantic coast of Europe and Japan, but the population appears to be declining almost everywhere.

Threats and Issues

- Reduced prey abundance - particularly the loss of old pasture due to the intensification of agricultural systems.
- Loss, damage and disturbance of roosting and hibernation sites.
- Loss of feeding habitats - insect-rich feeding habitats and flyways have been lost due to the reduction in wetland and hedgerow habitats, and the conversion of permanent pasture to other arable uses.

Objectives (as pertinent to agriculture)

The national species action plan specifies the following two objectives:

- To maintain all existing maternity roosts and hibernation sites.
- To increase the current population by 25% by 2010.

Conservation Advice

- **Protection of roosts** - greater horseshoe bats are sensitive to disturbance, especially of their nursery and winter roosts; consequently these sites need to be protected and entrances left unobstructed (in some cases, grids that allow access for bats, but prevent human access may be used).
- **Renovation of buildings** - all renovation/development work involving old farm buildings should take into account the need to check for existing

roosts, and to allow suitable access for bats in the post development period. Cavity wall insulation should be avoided, but if required, it should only be performed in the summer (having checked for the presence of bats).

- **Protection of underground sites** - where possible access to old mines etc, should be preserved (for bats), when human access is being prevented for safety reasons.
- **Timber treatment** - if timber treatment is necessary, mechanical replacement techniques are the preferred option. If chemical methods are to be used non-persistent sprays with low toxicity to mammals should be selected.
- **Foraging habitat management** - suitable habitat for foraging should be maintained and where possible expanded within 2 km of roost sites. In the case of the greater horseshoe bat, good habitat includes broadleaved woodland and unimproved grassland, rather than coniferous woodland or improved grazing.
- **Travel corridors** - bats don't like travelling in the open; therefore, unbroken hedgerows and tree lines should be encouraged.
- **Encouragement of recolonisation** - natural recolonisation should be encouraged by the sympathetic management of habitat and roosts within suitable areas.

References and Further Information

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