# **BRIXTON PARISH NEIGHBOURHOOD PLAN**



## STATEMENT OF CONSULTATION



#### INTRODUCTION

This Consultation Statement has been submitted by Brixton Parish Council, the qualifying body responsible for the preparation, consultation and submission of the neighbourhood plan. It has been assisted in the process by a separate Neighbourhood Plan Group and local consultants. The Planning Group is grateful to the District Council officers and the local community for their help and involvement in shaping the plan.

This consultation statement accompanies the Brixton Parish Neighbourhood Plan at the point of its submission to South Hams District Council as the Local Planning Authority. It meets the requirements laid down in the Neighbourhood Planning (General) Regulations 2012 and sets out:

- details of the persons and bodies who were consulted about the plan
- an explanation of how consultation was carried out
- a summary of the main issues and concerns raised through the consultation
- a description of how those issues and concerns have been considered and addressed in the plan where applicable



#### **COMMUNITY CONSULTATION**

The Brixton Parish Neighbourhood Plan group (BPNP) was formed in 2015 by local community volunteers and the Chairman of the Parish Council. From the early stages it was realised that the Neighbourhood Plan belonged, first and foremost, to the community of Brixton Parish. Therefore at every stage of the process in producing the plan, the community was consulted using questionnaires, workshops and public open days in order to gauge their opinions, visions and their concerns. In addition, BPNP group presented information to the community at various fetes and gatherings throughout 2015-2017. Brixton Parish Council was informed of progress with regular updates at its monthly meetings. These are included in the Consultation Statement below.

Within Brixton Parish there are several land owners with considerable sized estates and farmland, some of whom have already developed parts of their land for housing and employment facilities. Contributions from all land owners in the Parish were encouraged as part of the evidence gathering.

#### CONSULTATION WITH EXTERNAL AND INDEPENDENT ORGANISATIONS

With Sherford new town to the north and the South Devon Area of Outstanding Natural Beauty to the south, Brixton village lies in a high value environmental area, which is very sensitive to impacts of development. Consultation has been established with Sherford Community Liaison Group to ensure the vision of connectivity to the new town through footpath and cycle networks will benefit both Brixton and Sherford.

Independent consultation was achieved by employing the services of Devon Communities Together, in particular Martin Parkes, who helped with analysing the Community Questionnaire, leading the community workshops and consultation days and presenting the findings to the community through detailed analysis and reports.

The following table details the consultation process:



DATE	CONSULTEE	ACTIVITY	NUMBERS ATTENDED OR CONSULTED WHERE APPLICABLE	KEY ISSUES RAISED	HOW ISSUES WERE CONSIDERED BY NPG
29/4/2015	Brixton Parish Council	Item 8.8 in Brixton Parish Council Meeting 29/4/2015. Parish Council minute agreeing designated area covered by Neighbourhood Plan.	BPC + 18 members of the public	<ul> <li>Application Form for proposed NP Area for Brixton completed.</li> <li>Sherford will have its own town council</li> </ul>	
May 2015	South Hams District Council	<ul> <li>Designated area submitted to SHDC for 6 week consultation process.</li> <li>BNPG various meetings with other NP groups and SHDC strategic planning officers to ensure NP is working with the emerging SHDC strategic plan.</li> </ul>			



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June 2015	Brixton Parish Community	<ul> <li>NP process presented at Church Fete with opportunity for parishioners to provide initial input.</li> <li>Community invited to view NP Designated Area application online and displayed in various locations around the parish. Comments by 19/6/2015.</li> </ul>	28 people visited display		
24/6/2015	Brixton Parish Council	<ul> <li>Update on NP progress and intentions to Parish Council</li> <li>Brixton Neighbourhood Plan TORs and group membership approved by BPC.</li> <li>BPC approved designation of BPNP geographical area.</li> </ul>	BPC + 63 members of the public		
26/6/2015	South Hams District Council	Notification from SHDC that NP designated area application has been approved.			
29/7/2015	Brixton Parish Council	Progress report given to BPC and outcome of presentation at Village Fete in June.	BPC + 31 members of the public		



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30/9/2015	Brixton Parish Council	Progress report delayed until October due to time constraints	BPC + 44 members of the public		
28/10/2015	Brixton Parish Council	BPC informed of the requirement for a Housing Needs Survey and budgetary requirements	BPC + 9 members of the public		
25/11/2015	Brixton Parish Council	Housing Needs Survey discussed further at BPC Meeting plus statistical information on housing numbers from 2011 census.	BPC + 5 members of the public	To be distributed and returned April 2016	
27/1/2016	Brixton Parish Council	Forthcoming Community Survey and Community Workshop discussed at BPC Meeting	BPC + 8 members of the public	To be distributed and returned June 2016 with community workshop in July 2016	
24/2/2016	Brixton Parish Council	BPC informed that Housing Needs Survey will be delivered to all homes by end of March 2016	BPC + 10 members of the public		
30/3/2016	Brixton Parish Council	BPC informed of 2 week delay in distribution of housing needs survey due to printing difficulties and time constraints.	BPC + 7 members of the public		
April 2016	Brixton Parish Community	Housing Needs Survey document distributed	Every parish household, 800 in total		



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April 2016	Devon Communities Together	Housing Needs Survey Report issued by Devon Communities Together	233 completed surveys, returned 29% of surveys distributed.	Need for 11 affordable homes 2016-2021	To be used when considering housing within the parish in Development Policies
27/4/2016	Brixton Parish Council	BPC updated on progress of Housing Needs Survey and Parish Community Survey.	BPC + 17 members of the public	Land Use Policy SHDC to allocate housing numbers based on Housing Needs Survey	
25/5/2016	Brixton Parish Council	BPC informed of the process for the Neighbourhood Plan Questionnaire and its importance as evidence for the Plan.	BPC + 9 members of the public		
June 2016	Brixton Parish Community	Presentation at Church Fete to advertise Community Survey and results of Housing Needs Survey			
June 2016	Brixton Parish Community	Brixton Neighbourhood Plan 2016-2030 Questionnaire distributed	Every parish household, 800 in total		
29/6/2015	Brixton Parish Council/ District Coucillor Dan Brown	<ul> <li>Community Questionnaire and NP Budget update.</li> <li>Councillor Brown emphasised importance of NP putting the parish in strong position on planning matters.</li> </ul>	BPC + 16 members of the public		



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16/7/2016	Brixton Parish Community	<ul> <li>Community Workshop to further engage parishioners, including children, with community survey.</li> <li>Two Guided walks around the parish lead by local historian showing historic places of interest .</li> </ul>	111 people attended		
27/7/2016	Brixton Parish Council	BPC briefed on Consultation Day, overall progress of NP.	BPC + 15 members of the public		
July 2016	Devon Communities Together	Brixton Neighbourhood Plan 2016-2030 Questionnaire Report issued by Devon Communities Together	272 residents responded to the survey	<ul> <li>Importance of natural environment including AONB.</li> <li>Greenfield sites should not be developed.</li> <li>Interest in renewable energy projects</li> <li>Maintenance of existing footpaths</li> <li>Desire for a swimming pool</li> <li>Safer cycle routes</li> <li>Desire for more rural and aquaculture employment</li> <li>Importance of local shops</li> <li>Housing development must be small scale, sensitively designed and within the existing development boundary.</li> <li>People leaving parish due to housing reasons.</li> </ul>	



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September 2016	Brixton Parish Community	Community Workshop Day to present key findings of Community Questionnaire and to provide further opportunity to engage younger people with the development of the Neighbourhood Plan	110 people attended		
September 2016	Devon Communities Together	Community Workshop Day Report issued by Devon Communities Together		Evidence broadly similar to survey result. However employer engagement was limited.	NPG to engage with employers and land owners at later date
28/9/2016	Brixton Parish Council	BPC informed the Housing Needs Survey report had been agreed and the Community Consultation Report was under scrutiny by NPG. Plymouth Fringe Green Spaces also discussed and need to identify more within the parish with help from parishioners.	BPC + 16 members of the public.		
26/10/2016	Brixton Parish Council	BPC informed of the initial nominations of Local Green Spaces	BPC + 23 members of the public.	<ul> <li>Railway cutting between Otter and Elburton</li> <li>Meadow by A379</li> <li>Horsham playing fields</li> <li>Staddiscombe playing fields</li> <li>Tunnel and Brixton Tor</li> <li>Bridge at Coflette Creek</li> </ul>	



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30/11/2016	Brixton Parish Council	General update of progress of writing the plan and the Community Consultation on Visions and Objectives.	BPC + 15 members of the public		
21/12/2016	Brixton Parish Council	<ul> <li>BPC informed of Local Green Spaces Consultation process .</li> <li>NP Budget update</li> </ul>	BPC + 10 members of the public	LGS Consultation 28/12/16-8/1/17	
25/1/2015	Brixton Parish Council	BPC informed of general progress and budget issues.	BPC + 14 members of the public		
20/2/2017	Brixton Parish Community	Community Consultation on Neighbourhood Plan Vision and Objectives via Parish Magazine, Face Book, website and various shops and businesses.		Comments broadly in agreement with vision and objectives	
21/2/2017	South Hams District Council	Meeting with Tom Jones SHDC to discuss method of policy approval			
3/3/2017	Brixton Parish Community	Consultation on Green Open Spaces via Website, Face Book and Parish Magazine		Green Open Spaces nominated by Parishioners	Include in Green Open Space document as appendix to NP
29/3/2017	Brixton Parish Council	BPC informed of forthcoming Community Consultation in May	BPC + 10 members of the public		
11/4/2017	Devon Communities Together	Meeting with Martin Parkes DCT to plan Community Consultation Day on 23/4/2017			



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13/4/2017	Independent Consultant	Comments from Lee Bray independent consultant on draft policies		Potential for a good neighbourhood plan with some comments to improve effectiveness of policies	To discuss and consider any proposed changes
23/4/2017	Brixton Parish Community	Community Consultation Day on Brixton Neighbourhood Plan draft vision, objectives and policies.			
26/4/2017	Brixton Parish Council	BPC presented with draft policies by NPG at Annual Meeting	BPC + 13 members of the public		
29/4/2017	Land Owners	Consultation with major landowners in proposed BPNP Policy Areas	5 invited, 2 attended	Landowners expansion plans for employment and housing development	To be considered as part of final NP
24/5/2017	Brixton Parish Council	Progress update and informed of success of Community Day. Report from DCT is awaited.	BPC + 21 members of the public		
6/6/2017	Devon Communities Together	Community Day Report on draft vision, objectives and policies community consultation issued by Devon Communities Together.	71 attended and 18 submitted survey form after the event	All policies had strong support with 70% agreeing or strongly agreeing with every draft policy.	
June 2017	Employers	Meeting with major employer (Rodgers Garage)		Discussed future development	To be considered as part of final NP



DATE	CONSULTEE	ACTIVITY	NUMBERS ATTENDED OR CONSULTED WHERE APPLICABLE	KEY ISSUES RAISED	HOW ISSUES WERE CONSIDERED BY NPG
20/6/2017	South Hams District Council	Meeting with District Councillor Dan Brown to show progress of NP production and how the Plan will be integrated into the planning approval or refusal process.			
24/6/2017	Brixton Parish Community	Presentation at Church Fete to present on results of Community Consultation Day of 6/6/2017			
26/6/2017	South Hams District Council	Meeting with Wendy Ormsby SHDC Planning to discuss how NP will integrate with planning process.			
19/9/2017	The Rt Honourable Gary Streeter MP for South West Devon	Discuss the Neighbourhood Plan in particular the Strategic Green Space between Sherford New Town and Brixton	4 members of Brixton Neighbourhood Plan Group.		
27/9/2017	Brixton Parish Council	BPC informed of the progress and the consultation process to date when the Plan will be submitted for inspection.	BPC + 16 Members of the public		
25/10/2017	Brixton Parish Council	BPC consulted on approval of NP and given timetable of public consultation Nov-Dec 2017	BPC + members of public		
Mid November 2017	Brixton Parish Community Brixton Parish Council South Hams District Council and Statutory Consultees	Brixton Parish Neighbourhood Plan: First Draft For Public and Statutory Consultation under Neighbourhood Planning Regulation 14		See Regulation 14 consultat  Responses can also to http://www.brixtonparishcouncil.cc  Plan_2016_4506	oe viewed at: org.uk/Neighbourhood_



#### Consultation Responses to First Draft Brixton Parish Neighbourhood Plan - April 2018

Policy	Consultee	Comment	BPNP Group Response
	Roy Axell	I have perused the findings of the Neighbourhood Plan and would like to commend the team involved, working on behalf of Brixton, for the thorough and efficient job they have done in determining the views and needs of Brixton in the coming years.	Constructive comment
		I do hope that planners will use this important information and follow its findings when making decisions about Brixton in the future.	Constructive comment
	Sally Axell	I have now had the chance to read through the absolutely	Constructive comment
	Cally Fixell	fantastic document you have produced.	Constructive comment
		I cannot praise too highly the excellent presentation and photographs (including aerial ones, amazing). This has taken so much work - I am awestruck at the dedication of you all. Thank goodness for the calibre of the team.	Constructive comment
Cof1		A few remarks just going through it - how the village has grown over the last century and half century. It is super to have these things down on record. The "Community Assets" section - does there need to be a slight revision about the shop - about to have its demise? (Well, in the Spring of 2018 anyway)?	Comment noted and policy wording clarified
		The maps of the area with housing - Sherford hangs over us like the Sword of Damocles!	Constructive comment
		In the photo acknowledgments, just a very minor thing - Roy's name has got a double "I" if it's possible to change this, please?	Correction made
		It's very useful to have the Local and National Planning Policies at the back, both now and in the future - thank you.	Constructive comment
		A very tiny comment on the first page of the plan, the announcement (with the lovely picture of Torr Bridge) - it should be PRINCIPAL, please, not principle. Just me being pedantic.	Noted and amendments made
		But absolutely superb. We Brixtonians owe you all a huge debt and THANK YOU.	Constructive comment
	Highways England	Thank you for providing Highways England with the opportunity to comment on the pre-submission draft of the Brixton Parish Neighbourhood Plan. Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance consists of the A38 which forms the northern boundary of the Parish. However, we note that the neighbourhood plan area excludes that part of the Parish which will form the Sherford new town, as we understand that within the plan period (to 2034). Sherford Town Council will be created which will become the relevant authority for neighbourhood planning purposes.	Noted
Tpt1 and Tpt2		We are satisfied that the proposed plan policies are unlikely to result in development which will impact on the SRN and we therefore have no specific comments to make, although in general terms we welcome policies which will support and encourage sustainable modes of transport and reduce reliance on the private car. It should also be noted that any development proposals coming forward which have the potential to impact on the operation of the A38 will need to include a suitable transport assessment and mitigation measures in line with the requirements of DFT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development.	Noted
		These comments do not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.	Noted
	Jackie Kingdom- Lowe	Re- Community Facilities page 23/117	



Policy	Consultee	Comment	BPNP Group Response
Cof1		It is bizarre to see that Brixton Campsite is included in the list as a community asset. This is a private business, public access is prevented to the land it's on and there are no facilities or services available to the community from thi business. As per the definition given on the plan for Community Facilities, I cannot see how it even begins to meet the requirements. Other private businesses in the village could just as easily argue they offer as much of a community facility as the campsite but I don't see Just Williams restaurant, Otter Nurseries, Fordebrook Nursery, Brixton Fish and Chip Shop or Ladybirds Day Nursery listed as a community Facility on the plan? Surely if they are not listed then neither should the campsite?	Comment accepted and policy reviewed. References to Brixton Campsite to be removed from the final document (photo and Cof Map1).
Cof2		Whilst I think about it actually Ladybirds day Nursery (my employer) offers free government funded childcare and early years education including the pre-school which has close links and feeds the majority of children into Brixton St Mary's school and so should be listed as a community asset, although it is a private business. Historically the nursery has received little to no support from BPC and it really is about time that it's important role within our community was recognised and by listing it as a community facility on the Neighbourhood Plan would be a good start.	Comment accepted and policy reviewed. Ladybirds Nursery to be included as a Community Asset in the final document.
		'Definition of Assets of Community Value: A building or other land in a local authority's area is land of community value if in COMMUNITY FACILITIES the opinion of the authority — (a) an actual current use of the building or other land that is not an ancillary use furthers the social wellbeing or social interests of the local community, and; (b) it is realistic to think that there can continue to be nonancillary use of the building or other land which will further (whether or not in the same way) the social wellbeing or social interests of the local community. (Section 88(1) Localism Act 2011) Section 88(2) of the Act extends this definition to land which has furthered the social wellbeing or social interests of the local community in the recent past, and which it is realistic to consider will do so again during the next five years. (Part 5 Chapter 3 of the Localism Act 2011 and the Assets of Community Regulations 2012)And yet facilities like the local Pre-school which provide free childcare (government funded) and early years education is not even listed as a community facility. Without the pre-school within the village the school would not have such a healthy intake each September.	Noted
Sar1	Sport England	Thank you for consulting Sport England on the above neighbourhood plan.  Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.  It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England's statutory consulter role in protecting playing fields and the presumption against the loss of playing field sand. Sport England's playing fields policy is set out in our Planning Policy Statement: 'A Sporting Future for the Playing Fields of England's playing fields policy is set out in our Planning Policy Statement: 'A Sporting Future for the Playing Fields of England's they/www.sportengland.org/playingfieldspolicy Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy for sport and further information can which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sportforward-planning/	Noted. Refer to Brixton Parish Sport and Recreation Plan

Policy	Consultee	Comment	BPNP Group Response
		Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.	Noted. Refer to Brixton Parish Sport and Recreation Plan
		Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in tm, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance	Noted. Refer to Brixton Parish Sport and Recreation Plan
		If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http:// www.sportengland.org/facilities-planning/tools- guidance/ design-and-cost-guidance/	Noted
		Any <b>new housing</b> developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.	
		In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.	Network
		Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.	Noted
		NPPF Section 8:	
		https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities	
		PPG Health and wellbeing section:	
		https://www.gov.uk/guidance/health-and-wellbeing	
		Sport England's Active Design Guidance:	
		https://www.sportengland.org/activedesign (Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)	
	South West Water	Thank you for this the content of which is noted.	Noted



Policy	Consultee	Comment	BPNP Group Response
Cof1	Debbie Parnowski	We own Brixton fish and chip shop and notice we haven't been included in the 'community facilities' in the Brixton Parish Neighbourhood Plan and also notice Ladybirds nursery is not listed.  Please could you correct this by adding us and if you can't please explain why.	Noted.  Interpretation of the definition of 'Assets of Community Value' reviewed. Whilst the fish and chip shop is an important community facility it does not fall within the definition of an Asset of Community Value (refer to Part 5, Chapter 3 of the Localism Act 2011 and the Assets of Community Regulations 2012). However, Ladybirds Nursery does fall within this definition and has been included within revised policy Cof1.
	Carol Webb	I have read the policies and objectives and cannot find anything to disagree with.  Keep up the good work.	Constructive comment
	Martyn Oates	Preface, this includes concern in respect of rural identity could you consider adding that the parish is concerned also in respect of lack of adequate infrastructure to support our parish.	Noted. Preface amended to include development pressures on existing infrastructure.
		Green Space	
		This is a good concept, why is the area to the east of Lodge Lane not included though. A non development zone while good for protecting Brixton from further development pressure has very significant implications on landowners who may wish to capitalise on land for development, such consented development land being worth in the region of a million pounds an acre as opposed to around 10k per acre as agricultural land. It is for this reason that I am concerned that the Chair Brixton Parish Council corresponded with Luscombe Maye estate agents and Mr Basil Cane regarding landownership on behalf of BPC without telling the full parish council at the time, I believe it could undermine the impartiality of this plan, especially as this included correspondence with Mr Cane who clearly has well known and declared pecuniary interests. Any consultation on this sensitive area of landowner interests needs to be open and transparent. In the interests of openness and transparency I should add that I own a few acres to the north of Cross Park which are not currently under consideration for any type of development.  The plan should be very careful not to create a grey area between the old development boundary and the green space	The land east of Lodge Lane comprises 2 small fields confined between the existing house, Emsleigh, and the approved Canes Orchard development. It has not been included in the 'Green Space' as it is not true open countryside, being surrounded by development along Lodge Lane. This land may be suitable for small scale well designed dwellings in accordance with TTV31 (development in the countryside) in the JLP.  Given the recent planning approvals and construction of small scale developments along the western boundary of Lodge Lane, it would therefore be inconsistent to include the land east of Lodge Lane as part of the 'Green Space'.  The name "Strategic Green Space" has been reviewed and has been changed to "Strategic Countryside". This area is defined as open countryside abutting the village settlement boundary.  The comment on correspondence relates to bonafide communication on behalf of the BPNP group concerning land ownership enquiries as was explained when this issue arose in 2016.
		that becomes fair game for further development.	2010.
		Public Rights of Way	
		The plan states that it wishes to improve and provide new public rights of way.	Agreed
		Please can you add to the plan a clear map of all existing public rights of way including;	This already defined on the DCC Public Rights of Way website. www.new.devon.gov.uk/prow/
		Footpaths, Bridleways, unclassified county roads (green lanes) and in addition any permissive paths such as Silverstream Way.	
		Recent events do not indicate total active support from Brixton Parish Council for the policy of protecting public rights of way namely,	Not relevant to this Plan
		Clearing of green lane linking public footpaths 2.4, 5 and 20 at Brixton Torr was not supported by BPC, to the contrary it seems to have been opposed. Narrow lanes throughout the parish are continually being widened by oversized vehicles gouging the verges and generally exacerbating culvert blockages and sludge on our lanes. The net result of this is that the vehicles causing the damage then generally make it difficult for all other users. Could the plan consider a width restriction on our narrower lanes, I have experienced having to backtrack over 150 metres as a pedestrian in order that a large vehicle apparently unable to reverse, can pass me.	Not relevant to this Plan, it is a County matter.
		Footpath 31 under bridge near Yealm still closed after many months, why has this not been addressed? Change of blocked green lane to public footpath joining path 2 to Torr Hill Farm as suggested by DCC in 2014, this has not been actively progressed or pursued by BPC or DCC and this route remains obstructed as are parts of some other green lanes. Loss of public footpaths within Sherford, no indication yet of any mitigation/compensation for Brixton.	This is a Parish Council matter and is being addressed.  The maintenance of PROW is a County matter. However, the clearing of Footpath 2 could be considered as part of Parish Project Action Plan 1 and is being considered in the Sport and Recreation Plan as an Appendix to the BP Neighbourhood Plan.
		Please include within the plan a target of replacing those paths lost by Sherford stopping up to be mitigated by at least an equal length of new paths by way of compensation. Certainly much more than the short new section proposed in the current draft a circular all weather walking riding and cycling route would be appropriate, footpath 16 could be much improved, it is supposed to run alongside an attractive stream, would the landowner allow some voluntary hedgelaying?	Sherford is not included within the Designated Area Terms of Reference within the BPNP as this is being dealt with within the Sherford development Plan. This includes a comprehensive proposal for public access.

Policy	Consultee	Comment	BPNP Group Response
		After several years of frequent flooding and damage to roads in the Catson Green area, this remains unresolved with the net result that only large agricultural and daring vehicles can use these rights of way with walkers and cyclists frequently barred from use due to deep standing water.	
		I have detailed the above to illustrate that the plan is saying good things in respect of public access but in reality Brixton is suffering an erosion of public rights of way, the plan could recognise the many difficult issues currently facing public rights of way in Brixton, which often may only be resolved with cooperation from other authorities and private land owners but Brixton Parish Council could make these unresolved public rights of way issues a higher priority and indicate such in the plan.	The resolution of difficult issues with PROW is not within the scope of this plan.
		The plan goes on to suggest that the Catson Green route to the north will be promoted as a bridleway /quiet lane, this would actually be an erosion of public rights of way as it would be removing access to vehicles, although it would be a good improvement if an off road link were made to the current path	This lane will remain as part of the Highway and maintain and improve/facilitate much needed public access to Sherford.  Tpt Map1 on page 34 has been included for the purposes of
		18 (which has been diverted around the farmyard without consent).	illustrating improved or new access to Sherford and Plymouth
		Page 30 shows a map please improve this map to include the whole of Brixton Parish.	Agree - key title to be amended to clarify "Proposed Improvements" to the cycle route. The PC and NP Group has identified the problem of the unsurfaced section of the path in
		The map shows improved cycle and pedestrian links to Elburton (sustrans route 28), this route has not changed for at least ten years, so to say it is improved is misleading and for many years this route has been incomplete. Today at the Elburton end the route is so badly eroded in places and muddy	discussion with Plymouth City Council (owners) and the Sherford Liaison Group
		in other places that it can only be passed on foot, this also has been the case for many years. Can the parish plan confirm that you have consulted Sustrans who as you know not only put forward a comprehensive plan for a cycle route through Brixton but also currently own part of the proposed route.	We suggest this proposal could be addressed as part of Parish Project Action Plan 1.
		The route previously proposed by Sustrans was preferable to that shown on your page 30 map as it utilised Mill Lane which is already barred for motorised traffic and while the old railway line route remains unusable, cyclists could easily utilise the recently cleared route to access the existing section of Sustrans route 28 (another reason to support the recent clearing work). This would enable users to stay off the busy A379 and enjoy a more tranquil unmotorised route avoiding the narrow section past Otter Nursery where it is difficult for pedestrians and cyclists to pass motorised traffic. While I understand why you may wish to avoid potentially divisive debates regarding the Sustrans estuary route, the Mill Lane to Elburton route opportunity should not be overlooked and whether or not it is ever joined by an estuary route can be left for future consideration, incidentally the estuary route was	
		recently put forward for potential development by a presentation on the future of Steer Point quarry. At one stage the Sherford 106 offered 730k for offsite cycle and footpath development. Brixton should be at the front of the queue for this funding, if BPC are not proactive in this area Plymouth City Council will probably use these funds if they have not already done so. It may be helpful to refer to the Natural England Coastal Access draft scheme published in 2008 page 54 figure 25 refers to the Yealm (I have a copy if you need to see it).	
		Brixton Parish could greatly benefit from having a full definitive review on public rights of way, the plan could call on DCC for this and have an impartial authoritative assessment of public rights of way within Brixton. As far as I am aware Brixton has no bridlepaths, however the generally derelict state of our (UCRs) green lanes could be improved to the great benefit of both horse riders, pedestrians and cyclists, there appears to be plenty of demand from horse riders. Finally it is with extreme difficulty that new public rights of way are formed and this makes it all the more vital that our current enviable network of	
		paths and lanes are protected for all.  Upgrading a circular footpath route to an all weather surface would be a good investment for Brixton as many of our paths are not really useable by the less mobile during wet periods such as the current Christmas New Year period when path demand is high.	
		Employment Areas	



Policy	Consultee	Comment	BPNP Group Response
		While I understand and support your logic for protecting employment land my understanding of current planning policy was that all current employment areas could be changed to residential, can the parish plan override such policies? Currently most of the Otter site has been tarmacked over with resultant serious drainage issues for footpath 6 and the stream that runs to the head of Cofflete Creek. The danger of further employment use in this valley is that further runoff will continue to increase on an already overloaded drain and the stream, the result will be further increased flood risk at Brixton Torr. Do not take my word for this, take a walk in the area during or just after some wet weather and you will see my point. The stream passing through Fordbrook not only drains much of the current Sherford site but also east to fields near Genitian Hill and to Catson Green, all which flood regularly. A solution to some of these drainage problems may be to find areas suitable for re establishing marshy areas with obvious wildlife benefits too (this could come under your action plan 7 greening, incidentally DEFRA too are now talking of such schemes). Could the plan include any demographics on how many people both live and work in Brixton.	Protecting specific employment areas is the purpose of this policy to avoid loss of important employment use.  We note this comment and will look to amend the proposed Employment land away from the immediate vicinity of the water course to the west  Refer to the Office of National Statistics data.
		Sport and Recreation	
		There have been 106 funding opportunities for a number of years now, so far I am not aware that any of these have been utilised, is this going to be a priority in the Parish plan? The plan resolves to develop the Old Mill site at Cofflete this would link in well with cycle/pedestrian access via Mill Lane. However the Parish council of late has taken on projects like the Brixton Stones and more recently the acquisition of telephone boxes without clearly costed objectives/outcomes that benefit the Parish. At the moment Cofflete Creek can be accessed with a very very limited tidal window for canoeing, paddleboarding etc, this area could be improved if the car park area was carefully re opened. However if the parish took over the Old Mill site it is unclear what the benefits would be, could the plan explain what benefits the parish would gain from owning the Old Mill site which has a very dilapidated wall adjacent to an equally dilapidated public road and could become a serious liability for any owner.	The Sport and Recreation Plan will set out ideas for Section 106 Funding.  Cofflete Mill site will be subject to community consultation.
		Community Facilities	
		The parish severely lacks any property assets which could be used to benefit the parish, opportunities to purchase land et as part of any conditions on the recent house building spree seem to have been either missed or over overlooked. Responsibility for this lies firmly with SHDC for allowing such a poorty planned piecemeal development at the Venn farm RA12 site. However the parish has a good facility within the school which is now in need of refurbishment, the community room and hall are looking shabby. With this in mind can the plan commit to maintaining the current facilities in priority to taking on lots of new projects. The Parish Council for some years has talked of a sport and recreation group to progress using 106 funds, I am not aware that this has happened and possibly some of the funds have now been either spent elsewhere or lost as the 106 funds are usually time bound.	Refer to previous comments
		I am not convinced that Brixton Campsite is a community facility, it is operated privately for profit the site has a poor record of compliance on planning conditions, as far as I can tell this site is being used permanently in contravention of planning conditions and fire regulations. Have Drixton Parish Council followed up their commitment to represent local residents in respect of protecting dwellings close to the site through planning conditions. It would also be inconsistent not to include other private campsites operated in Brixton at Spriddlestone and next to Pippins cattery. I believe it would be best to exclude all privately operated facilities such as the campsite unless you are going to include all such facilities in a consistent way. I can however see that the plan may wish to ensure that the campsite is not developed for permanent housing developments even though it currently appears to permanently house people in caravans.	The reference to Brixton Campsite as a community facility will be removed.  Noted
		Renewable Energy	
	_	-	1

Policy	Consultee	Comment	BPNP Group Response
		The plan alludes to supporting a further solar farm project in Brixton, this is not a satisfactory way of executing the parish plan. If there is a potential case for additional solar farms in the Parish then the plan should openly state any such case but not skirt around the issue and be somewhat non straightforward and create a grey area which could be utilised by potential solar farm developments. The same would apply for any other form of renewables wind, tidal biodigestors etc. The plan should bear in mind that there are two large wind turbines consented for Sherford in addition to the significant existing solar farm.  Finally thank you to all of those compiling the plan and apologies for perhaps digressing on some points. I hope that	The Policy wording has been reconsidered and amended accordingly.
		this plan will succeed and not become another plan or vision that planning authorities do not respect. Please will you confirm that this response will be fully circulated to all Brixton Parish Council and members of the Parish Plan team, I may forward my response to other interested parties. An open form of consultation as per planning applications would have been good. (confirmed circulated to NPG)  Best Regards Martyn Oates	Your comprehensive response is noted and has been circulated as requested.
	Jo Lynn	I have read through the First Draft of the Parish Neighbourhood Plan and am personally happy with the policies and content of the Plan. There is a good balance between support for appropriate development and maintenance of the essence of Brixton village.	Constructive comment
		Before we moved to Devon in 2015, I was a member of the NP group in my previous parish in Sussex. Therefore I know only too well the effort and time required to prepare a Plan for submission and, as such, I applaud the Brixton group for achieving this First Draft stage.	
		Fingers crossed for good reception from parishioners and local council.	
		Regards Jo Lynn	
	Roger Hepher HGH Planning	We represent the prospective long-term lessees and developers of Steer Point quarry and brickworks.	
		You will be aware that we organised a public consultation event on 18 November at the village school. This was very well attended, and demonstrated that there is a high degree of support for the scheme we displayed, involving a low-impact senior living hamlet on part of the site; restoration for nature conservation of the rest; and the creation of much better footpath and cycleway links throughout the area.	
		We would like to suggest as follows:	
		DewMap2 should be amended to show the red line extending around the whole of the disused quarry, not just the former brickworks. It is all brownfield land and a scar on the face of the AONB; and the former quarry and the former brickworks are inextricably linked. Furthermore, it is apparent that there is considerable local opposition to the quarry being landfilled, and support for a solution that would involve some development on former quarry land and restoration to nature of the rest.	The red line has been carefully considered to include only the area of existing hardstanding comprising the former brick works operational buildings and storage yard. This is a defined brownfield site which is not subject to the approved landscape restoration of the quarried area. We concur there is considerable opposition to the proposed method of restoration of the quarried area.  To include the whole of the disussed quarry site would be out of scale within the setting of the AONB and scale of Brixton village.
		Policy Dev8 is worded rather negatively. It would help to secure an appropriate future for the site if it could be amended to be more proactive, noting the potential for a suitable form of development on part of the land, albeit that such development would need to be sited, designed and landscaped to the highest standards.	Dev10 policy is carefully worded so as not to preclude development on the condition that there is substantial and sustainable overall community benefit. It goes without saying that any development in the AONB should to the highest standard and reflect our own policy Dev3. Note: Previous Dev8 renumbered to Dev10.
		We will be happy to elaborate upon these representations should you find this helpful.	
		Kindly acknowledge receipt of this email (done) Roger Hepher, Director	
	Hazel Hawken	I have read the objectives and policies of the Draft Neighbourhood Plan and think they have been well thought out and easy to understand. Hopefully the Plan will be accepted allowing our community to have a bigger say in any development applications.	Constructive comment
		thanks for the hard work that I know had gone into this, keeping the village feel in mind.	
		Yours sincerely, Mrs Hazel Hawken	



Policy	Consultee	Comment	BPNP Group Response
	Alistair Macpherson	Huge congratulations to you for getting the plan this far. Its an impressive document managing to be both comprehensive and concise in the same breath - as well as looking highly professional. Well done.	Constructive comment
		I am not entirely clear what kind of response / feedback you are looking for in this consultation, but here are some general thoughts that follow a similar theme to my input into the last questionnaire.	
		Vision - This looks good but responding to climate change is notable by it's absence. I would suggest adding something along the lines of build a community that will be resilient to future economic downturns, rising energy prices and climate change.	Noted
		Objectives- These all look good. The reference to renewables is positive but feel it could be strengthened broadened to include energy efficiency projects if it was part of a wider statement around 'initiatives that support transition to a low carbon future'	Noted
		Policies - All the policies have my support with the exception of DEV5 as the proposed provision for car park seems excessive.	Recent evidence of the lack of well considered parking provision and public realm within the completed housing schemes at Canes Orchard in Brixton Village and Kitley View in neighbouring Yealmpton demonstrate the requirement for a more robust approach to parking provision.  Should the requirement for car parking diminish in the future this space will provide 'breathing space' adjacent the public realm.
		ENV2 and ENV6 - For the purpose of clarify I think extra explanation is required as to why you have seperate policies for ENV2 and ENV6 because it looks as these policies and associated allocations seek to achieve the same outcomes.	ENV2 specifically identifies fields with important open countryside views at the eastern and western approaches to Brixton village that characterise it's settling. ENV6 is under review. This area defines a significant area of countryside north of the village and will be re-designated as Strategic Countryside.
		Cof4 - this should be worded 'provide for or provide s106 contribuion towards' to be consistent with other policies and avoid provision of small useless play space	We assume this is a reference to Cof3. This policy has been amended.
		Emp4 - the wording of this policy is unclear as to whether the parish is protecting purely for employment or whether it would accept housing on the site in the right circumstance. Whilst I share the sentiment of needing to secure community benefit from any development of the site I would suggest that identifying as 'strategic value for employment' was undermined the very positive statements about employment use at Chittleburn. Is it really where the parish wants employments uses for the foreseeable future?	This policy has been reviewed and removed from this section. The importance of this site is now referred to in a new policy: Dev10.
		DEV3 - I think this policy should be strengthened and expand to reflect the approach taken for larger developments within the JLP. See JLP policy DEV34 for policies relating to onsite renewable energy & solar master planning.	Noted
		I trust that is helpful	
		Please pass on my congratulations to Ray & Jon. Best wishes, Alistair Macpherson	
	Shona McDonough Clerk to Newton & Noss Parish Council	Newton & Noss Parish Council met yesterday evening and considered the matter.	
		The members were in agreement, commending Brixton Parish Council for the work undertaken in preparing their Neighbourhood Plan and to wish every success.	Constructive comment
	Natural England	Planning consultation: Brixton Neighbourhood Plan – Regulation 14 version	
		Thank you for your consultation on the above dated 01 December 2017.	
		Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.	
		We welcome the emerging Brixton Neighbourhood Plan. Brixton parish supports a rich and diverse natural environment and the coastal margin of the Parish of national importance for its biodiversity, geodiversity and landscape interest, reflected in the designation AONB designation and Yealm Estuary Site of Special Scientific Interest as well as numerous Priority Habitats within the parish boundaries.	Noted
		We note that the Neighbourhood Plan does not allocate new development but contains a number of environmental policies to complement the policies in the newly emerging Joint Local Plan. We would like to make the following comment:	

Policy	Consultee	Comment	BPNP Group Response
		Policy ENV8 – In accordance with the mitigation hierarchy as set out in the National Planning Policy Framework, we would advise you to replace the word 'minimize' with the word 'avoid'. You could then add that where it is shown that adverse impacts cannot be avoided, appropriate mitigation should be provided.	Noted
		We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.	
		For any queries relating to the specific advice in this letter only please contact Corine Dyke on 02080 268177 07717 888537 or corine dyke@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.	
		Yours sincerely, Corine Dyke Lead Adviser Sustainable Development Team – Devon, Cornwall & Isles of Scilly	
	Sustainable Places Planning Specialist Environment Agency	We are generally supportive of plan's vision especially to conserve and enhance the rural and historic environment of the parish. We consider that environmental objectives are good, particularly the objective to protect/enhance the Yealm estuary and the parish's green corridors, to protect/encourage biodiversity, and to protect/enhance/create green spaces.	Noted
		Environment policies Env1 through to Env6 are supported and welcomed. Nonetheless we consider that these policies could be strengthened further. For example, policy Env3 refers to priority habitats. We consider that this should also refer to mudflats, which constitute an important priority habitat for this parish.	Noted
		There is also very little with regard to flood risk and coastal change. It is indicated in the appendix that Env1-Env6 also address these matters but that is not obvious within the policy wording or supporting text. It is also noted that the plan contains nothing relating to water quality which is surprising given the importance of the estuary/rivers for water related activities/recreation for the Parish (as highlighted in policy Sar3). Whilst the ability to address such issues at a local levies is limited we recommend some sort of parish level commitment to seek improvements to water quality through better management of run-off and foul drainage.	Noted. Existing infrastructure is under considerable strain with recent housing development and the increased run off of surface water.  Sherford run off is of particular concern to Brixton Torr residents who already experience flooding issues.  Following a report on the problem of sewage overflow into the River Yealm (Source DEFRA 2017), Policy Env3 has been amended to include additional section referencing estuary pollution.
		Please let me know if you have any questions or require further clarification.	
	Historic England	Thank you for your consultation on the Brixton Neighbourhood Plan. Our apologies for not responding before now.	
		This is our first opportunity to feed into the Plan's preparation since we offered generic advice at the time the area was designated in 2015.	
		We are impressed that the Plan sets out as a primary objective the protection and enhancement of its distinctive historic character. This is reflected not only in the suite of policies and proposals but in the Panish Pro	Noted
		Our only policy specific comment relates to Policy Intent Emp2. on p33 of the Plan. Though referring to it as a "preference" this would appear to effectively allocate an area of 2.5 ha in the vicinity of Dodovens Farm/Chittleburn Business Park for B1 light industrial use to complement the existing businesses. As a new allocation it is important to ensure, and demonstrate with appropriate evidence, that such an allocation will not cause harm to designated heritage assets in accordance with the provisions of the National Planning Policy Framework (NPPF). Reference is made on pA.11 to the policy's compliance with a range of JLP and LDF policies but it is not clear whether and how compliance with national and local policies for the protection and enhancement of the historic environment has been pursued and confirmed.	Size of designated area has been reviewed and reduced in size.  The nearest designated heritage asset is at Combe Lane which is approximately 0.3km from the proposed site on the opposite side of the A379 and obscured by the existing topography so is not deemed to cause any harm to the setting of the listed building.
		While the distribution of designated heritage assets in the area probably means that the potential for harmful impact may be unlikely it nonetheless behoves the Plan preparation process to demonstrate this fact with evidence. This should not be an onerous exercise, but it makes sense to address this matter and update the evidence base before submitting the Plan for Examination.	Mapping evidence from the HE website <a href="https://historicengland.org.uk/listing/the-list/map-search">https://historicengland.org.uk/listing/the-list/map-search</a> has determined that there are no designated historic assets affected by any of the Plan policies. See also note above re. Chittleburn
		Kind regards, David Stuart, Historic Places Adviser South West	
19	Brixton Parish Council Meeting	Identification of land in the ownership of SHDC that could be made available for community housing along Steer Point Road.	This has been considered and included in the revised Neighbourhood Plan to contribute to the JLP identified 10 houses as affordable houses for local people in perpetuity.

Policy	Consultee	Comment	BPNP Group Response
		Below are comments in response to representations on	http://www.brixtonparishcouncil.org.uk/
		behalf of developers. The full documents are online.	Neighbourhood_Plan_2016_4508.aspx
	Emery Planning	INTRODUCTION Paragraph 1.2	We disagree with the comment on prematurity. The BPNP is consistent with the recently published South Devon AONB Management Plan (2014-2019) and the Joint Local Plan (inspection now complete March 2018)  The 'Strategic Green Space' shall be renamed 'Strategic Countryside'
		Paragraph 1.3	The proposed development at Stamps Hill does not make a valuable contribution to Brixton village as evidenced in the Planning refusal by SHDC.
		INTRODUCTION, BASIC CONDITIONS and NATIONAL PLANNING POLICY AND GUIDANCE Paragraphs 1.4 - 3.22	Noted
		Paragraph 3.23	We agree. All stakeholders were invited to the numerous, widely advertised, public consultation events throughout the 3 years preparation of this Plan.
		Paragraphs 3.24 - 3.27	Noted
		THE DEVELOPMENT PLAN Paragraphs 4.1 - 4.2	Noted
		RESPONSE TO THE DRAFT POLICIES Paragraphs 5.1 - 5.2	Noted
		Paragraph 5.3	The guidance in the JLP for housing provision within Brixton for the period 2014-2034 is circa 10 houses. Since 2014.121 houses have already been approved, a significant proportion are under construction or complete. Within this context (a 25% increase in housing numbers), the principal concern expressed by the community was to restrict large scale development in order to sustain the important rural character of the village.
		Paragraph 5.4-5.5	Noted and comments made above
		Paragraph 5.6	The period for a review of the Neighbourhood Plan of 5 years is reasonable and is consistent with other plans. The Plan allows for this review under section 'Delivering the Plan'
		Paragraph 5.7 and 5.8	Noted
		Paragraph 5.9	BPNP Policy Dev2b removed to align with JLP TTV31
		Paragraph 5.10	Noted
		Paragraph 5.11	The housing need for Brixton has already been addressed.
		Paragraph 5.12	Despite the recent increase of 25% in housing stock, it has not reversed the decline in community facilities in Brixton village.
		Paragraph 5.13	Disagree
		Paragraph 5.14	Policy is in accordance with JLP
		Paragraph 5.15	Both the recently completed developments at Canes Orchard and Kitley View demonstrate that well designed and sufficient parking provision is essential given the lack of regular public transport and the high car ownership evidenced in the community surveys.
		Paragraph 5.16 and 5.17	This is consistent with the JLP
		Paragraph 5.18	See comment to paragraph 5.6
		PROPOSED HOUSING ALLOCATION Paragraphs 6.1 - 6.5	This Neighbourhood Plan has been three years in the making. Neither the BPNP or the Parish Council have been approached by Wain Homes with reference the Stamps Hill site during the long preparation of this Plan. The only contact has been in connection with the submitted planning application. This application has been refused planning permission by SHDC.
		SUMMARY AND CONCLUSIONS Paragraph 7.1	Noted and comments as above
		Paragraphs 7.2	The decision of the SHDC Development Management Committee is supported.
	PCL Planning	Paragraph 1	The Neighbourhood Plan is a result of extensive public consultation in the community to determine the future of Brixton parish where the consultees live and work. The consultation identified significant concerns about the substantial development of housing since 2014 in the Parish, and the negative impact on the character and social wellbeing of the community, particularly Brixton village which has been subject to 121 approved new houses since the start of the period of the Plan 2014-2034. This is substantially in excess of the circa 10 houses to be provided in the village identified in the JLP.

REGULATION 14 CONSULTATION APPENDIX 3

Policy	Consultee	Comment	BPNP Group Response
			Ref to Introduction, page 7 reference Neighbourhood Planning and Development.
			To be added to the document for clarification:
			"Throughout the document, the term 'neighbourhood plan'
			refers to a 'Neighbourhood Development Plan', as introduced
			by the Localism Act 2011."
		Paragraph 2 and bullets, Paragraph 3	Disagree, BPNP complies with the basic conditions.
		Paragraph 4	With particular regard to the NPPF (national), the BPNP provides opportunity for further employment to the existing businesses at Chittleburn.  The SHDC Brixton Parish Housing Needs Survey 2016 identified 29 houses (18 open market and 11 affordable) are required for the next 5 years. This number has been provided for with the approval of Canes Orchard Phases 2A, 2B and 3 within the village
		Paragraph 5	As above and in accordance with Local Development Framework and emerging Plymouth and South West Devon Joint Local Plan (local).
			In addition to the approved housing numbers and since consultation, the Plan as a living document, has been updated to include an identified site to provide affordable homes for local people within the village settlement boundary. This site is deliverable.
		Paragraph 6	Noted
		Paragraph 7	Disagree as response to paragraph 4.
		Paragraph 8	BPNP Policy ENV6 has been reviewed. This area defines a significant area of countryside north of the village and has been re-designated as Strategic Countryside. This clarifies the designation and addresses the 3 points in para 8 regarding Green Space.
			Policy ENV6 is fully compliant with the JLP Policy TTV31: "1. Housing and employment development adjoining or very near to an existing settlement will only be supported where it meets the essential, small scale local development needs of the community and provides a sustainable solution."
		Paragraph 9 and 10	As above
		Paragraph 11	Disagree for reasons stated above.
			The BPNP reflects the wishes of the community as required under the Localism Act 2011. As updated it does provide opportunities for development of small numbers of high quality houses in appropriate locations which do not harm the rural and historic character of the Parish and meet a local need.





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Please reply to: Mandy Goddard Service: Placemaking Direct telephone: 01803 861279

E-Mail: mandy.goddard@southhams.gov.uk

Kirstie Aldridge Clerk to Brixton Parish Council

BY EMAIL ONLY

15/01/2017

Dear Kirstie

#### South Hams District Council response to the draft Brixton Neighbourhood Plan

Thank you for sending the pre-submission Brixton Neighbourhood Plan (Regulation 14)\* to the Local Planning Authority (LPA) for comments. This will be referred to as the Draft Brixton Neighbourhood Plan (the NP) in this document.

The LPA fully supports the initiative to produce a neighbourhood plan and recognises that much work has gone into the development of the NP with extensive community involvement. The LPA commends the Brixton Neighbourhood Plan Group for all the hard work already put into the NP.

These comments have been provided to assist the Neighbourhood Planning Group in producing a Draft Neighbourhood Plan for submission to the LPA at Regulation 15\*. The response is based on the information provided and available at the time of reviewing the NP, which includes the pre-submission draft Brixton Neighbourhood Plan (Nov 2017) and appendices available on the website.

A number of suggestions are made below for further consideration prior to submission at Regulation 15, to help ensure the NP is successful at examination and contributes to a strong planning policy framework for the Brixton Neighbourhood Area.

\*Neighbourhood Planning (General) Regulations 2012

I hope you find these comments useful. Please do not hesitate to contact me if you would like further clarification on any of them.

Best wishes,

Mandy Goddard Neighbourhood Planning Specialist

www.southhams.gov.uk

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#### APPENDIX :

SHDC Consultation Responses to First Draft Brixton Parish Neighbourhood Plan - April 2018

Policy Ref	BPNP Policy	SHDC Comment	BPNP Group Response
1)		The NP is on the whole well considered and well drafted and, with some minor amendments, is likely to help meet the stated Vision and Objectives for the Neighbourhood Area.	
2)		Conformity with the Development Plan and meeting the Basic Conditions. As your Basic Conditions Statement makes clear, two of the "basic conditions' neighbourhood plans must meet is to have regard to the National Planning Policy Framework (NPPF) and to be	the JLP has not been adopted and therefore the 2006 Core Strategy remains the current South Hams District Council local planning policy.
		regard to the National Planning Policy Framework (NPPF) and to be in conformity with the strategic policies of the Local Development Plan that is extant at the time of the examination of the NPF For South Hams, this is currently the 2008 Core Strategy except where this is out of date and the NPPF takes precedence. However, it is likely that emerging policy will be adopted by the time of the NP examination. The Pymouth and South West Devon Joint Local Plan (LIP) is currently being examined and is expected to be adopted in 2018. These comments therefore assume that the JLP is the relevant Local Development Plan for the Briston NP. If this is the case, all references to the Core Strategy should be removed from the NP and from the Basic Conditions Statement, All sof strategic.	The Neighbourhood Plan is a living document and therefore will be reviewed periodically and amended accordingly.
		Development Plan policies is included as an appendix to this letter.	
3)		Overall development strategy: It is recognised that the parish of Brixton has seen major recent and ongoing development, and also that there limitations on development within the neighbourhood area due to the location on the edge of the AONB. However, the NPPF does strongly encourage local planning policy to have a positive attitude towards development wherever possible. In addition, JLP policy TTV30 identifies Brixton as a "sustainable village" where development for 10 dwellings might be delivered through a neighbourhood plan over the JLP plan period, notwithstanding any development that has already taken place or that has already been granted permission.	Regulation 14, the BPN Plan has been updated to include land owned and put forward by SHOO for the provision of community housing. It is adoptated that it might deliver the required number of diveilings for Blocken dis a businessed willage.
4)		Affordable Housing. It is not made clear within the NP what the assessed level of affordable housing is within the Neighbourhood Area, nor how this need or likely further need arising within the NP period is likely to be met. As such, the NP has not demonstrated how it will assist in meeting local needs and the requirements of Section 6 of the NPPF: Delivering a wide choice of high quality homes	
5)		For the above reasons, the LPA is concerned that the NP as currently drafted does not adequately demonstrath how it has had regard to the NPPF and is in conformity with the strategic elements of the Development Plan. The LPA would prefer to see a) more positive wording within the policies and supporting text of the NP to demonstrate that it is not anti-development, b) the allocation of one or more development sites to deliver in the region of 10 devellings that would meet local and affordable housing need. This may be appropriately delivered through a Community Land Trust or other community-def housing, which is an opportunity for the local community to control development coming forward and to ensure that local needs are met.	See comment 3) above to deliver community housing.
6)		The LPA has some other concerns about the NP's conformity with the strategic policies of the JLP and with the NPPF, particularly in regard to the Development policies. These concerns are picked up in the detailed comments below.	General Policies and evidence have been revised.
7)		The Evidence Base. The appendices to the NP provide clearly presented evidence, although a) evidence for the proposed Local Green Space designations could usefully be expanded to provide a clearer demonstration that each one meets the criteria set out in NPPF 77, and b) we were not able to access the Housing Needs Assessment from the link given in the appendices.	Local Green Spaces Appendix has been amended to reflect the ortenia in the NPPF 77.  The Housing Needs Survey is readily available on the Brixton Parish Council website: <a href="https://prixton.parishcouncil.org.uk/NeighbourhoodPlan">https:///prixton.parishcouncil.org.uk/NeighbourhoodPlan</a>
8)		SEA and HRA. Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA): When the NP is submitted to the LPA at Regulation 15, it will need to be accompanied by either a screening report saying that SEA is not considered necessary, or a full SEA report. HRA screening will also be necessary in order to demonstrate compliance with European laws. Please request an SEA/HRA screening report from us by emailing SW-Neighbourhood*Planning Neighbourhood*Plangwidevon.gov.uk. The target for completing screening reports is 10 weeks, including consultation with statutory consultaes. Should SEA be considered necessary, this can be undertaken at no cost to the NP group wis the DCLG support package available at https://mycommunity.org.uk/lake-action/neighbourhood-planning/support-orants/	It identified that an HRA is not required.

A.30

Bollov Bot	BPNP Policy	SHDC Comment	BPNP Group Response
9)		Other. There is some repetition of JLP policy, which is understandable given that the NP has been progressed to a similar timescale as the JLP. However, this may cause contision where NP immescale as the JLP however, this may cause contision where NP immescale as the JLP policy flow in the property of	Local detail relevant to the Parish has been added to the BPNP
	Comments on specific parts of the Neighbourhood Plan		
	Where a particular policy is not commented on, please assume that the	1.DA	
	where a particular policy is not commented on, please assume that the	LPA supports it	
	Section, policy or text	Comment	
	Map, p.2	For clarity, we would prefer to see this map renamed 'Neighbourhood Plan Area', which should be shaded to clearly show the exclusion of the Sherford area.	The map is included to identify Parish Characteristics not solely the NP Area which is identified. The NP area is clearly identified in Appendix 1: Terms of Reference.
	Environment section	A map showing the location of the Neighbourhood Area in relation to	Identifying AONB text enlarged to clarify
Env2	Env2. The land identified on Environment Policy Env Map 2: Policy Area Env2 will be protected from development to maintain the important public open views across the South Devon AONB that define the setting and character of Brixton village and its eastern and western approaches.	the AONB would be useful in this section.  Are there any circumstances in which some types of development in this area would be acceptable? A blanket ban on any development at all may not be realistic.	These policies are site specific unlike JLP policies DEV28 and DEV 30. It is considered that a development restriction is entirely appropriate in the identified locations.
Env3	Env3. (a) Priority Habitat throughout the parish, including deciduous woodland, wood pasture/parkland, ancient woodland and wildlife corridors as shown on Environment Habitat Policy Map, will be protected and enhanced (b) Important woodlands are to be conserved and enhanced for their contribution to the character and bit-diversity of the parish. See Appendix 9: Env Map 4.	Does this add significantly to the environment policies in the JLP, especially DEV28 and DEV30?	Priority Habitat classification is often overlooked by the LPA and the identified Habitats are an important characteristic of Brixton Parish.
Env4	Env4. A green corridor will be maintained for visual and ecological significance to protect against the further urban expansion east of Plymouth along the A379, and to safeguard the individual identities of Chittleburn, Combe, and Brixton village, as defined on Env Map 2: Policy Area Env4.	What exactly is intended here? Is no development to be permitted in this area at all, or might certain types of development or design be considered appropriate?	The policy is to protect against ribbon development and losing the identities of separate settlements along the A379 and to encourage the biodiversity.
Env5	Env5. (a) Local Green Spaces will be protected and enhanced. Only development directly associated with and necessary to improve the green spaces will be permitted within them (Environment Policy Map Env Map 2 and Appendix 7). (b) Measures to improve the appearance of the A379 route through Brixton, particularly through measures such as tree planting and green landscaping, will be supported. See Env Map 2.	Suggest wording is included which clearly designates the LGS e.g. The following green spaces as identified on Env Map 2, are designated as Local Green Spaces' Then list all proposed LGS by name and map ref.	Local Green Spaces have been updated to show compliance with National Planning criteria.
Env6	Env6. The area identified as the Brixton Strategic Green Space (Env Map 2) shall be asteguarded during the Plan period (2014-2034) except in the event that a future Housing Needs Survey identifies the need for essential, affordable local housing for Brixton community, in which case small numbers of well designed, sensitively located housing might be considered; in any event not before 2023 when the first review of this Plan is due. This review will also consider the development progress of Sherford and any impact on the Brixton Strategic Green Space. No development will be permitted that adds substantially to the cumulative impact of development in the village that will adversely impact on the social wellbeing and character of the village.	Suggest this policy is reworded in a more positive way, e.g. Within the area identified as the Brixton Strategic Green Space (Env Map 2), proposals for small scale housing development will be supported where a) they can be demonstrated to meet an essential local need b) they are sensitively located etc Consideration should be given to how this policy relates to the policies in the development section below.	The area designation wording amended. Policy amended.
Env7	Env7. Designated historic and heritage assets and their settings, both above and below ground, shall be conserved and enhanced. Development proposals are required not to harm but to conserve, restore and enhance designated and non-designated historic and heritage assets and their settlings.	The identification of local non-designated heritage assets is welcomed and adds detail to JLP Policy DEV2. The first paragraph of this policy is not considered necessary as designated assets are already well protected in policy.	Noted
Env8	Env8. Private or community renewable energy generation schemes will be supported provided they are designed to minimize harm to local heritage, biodiversity, landscape, views and skylines, through noise or other nuisance and be in keeping with its setting and surroundinos.	Is any type of renewable energy generation of any size acceptable? Some clarification is needed.	Any size of renewable energy generation will need to assessed against national and local development policies.
Cof1	surfournings.  Coff: The following local facilities are designated as Assets of Community Value*: The Post Office / village shop The Foxhound pub The Scout hut Si Mary's School Assets of Community Value shall be protected and retained. Development that would result in the loss of or harm to any such asset will not be permitted unless there is equivalent or improved alternative provision in the parish.	Have these facilities been formally listed as Assets of Community Value? See https://www.southhams.gov.uk/article/38 51/Assets-of-Community-Value? Suggest adding to this policy words to the effect 'unless it can be demonstrated that the facility is no longer needed." Permitted development rights should be referred to in respect of the shop.	
Cof2	Cot2. New development will be required to contribute towards the provision or improvement of community facilities in Briston in accordance with adopted standards and local promities which could include but is not restricted to: a parish hall, off-street car parking and/or car park, a visitor car park in Briston Village, Play spaces, allotments, Network improvements to footpaths, bridleways and cycle paths, measures to mitigate traffic flow and speed through the village, improvements to and "greening" of the A379 corridor, public river access	CIL regs should be referred to: planning obligations must be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. See http://www.legislation.gov.uk/ukdsi/2010/9780111492390/part/11	SHDC does not have a CIL regulations policy. Section 108 contributions will be required under statutory planning obligations but must also consider: Briton Parish Sport and Recreation Plan and Briton Parish Community Facilities Plan
Cof3	Cord. Developments of more than 5 homes shall incorporate adequate public landscaped space and provision for safe children's play within the development.	What is considered 'adequate' in this context? It would be useful to refer to JLP evidence https://www.plymouth.gov.uk/jointlocalpla nevidencebase and Fields in Trust guidelines http://www.fieldsintrust.org/	Policy wording amended.



	BPNP Policy	SHDC Comment	BPNP Group Response
Sar1	Sar1. Public open space, private outdoor sports grounds, school	What does this policy add to JLP DEV3?	This policy adds further local detail.
	playing fields and allotments shall be protected and retained in that use. Only development directly associated with and necessary for	What does this policy add to JEP DEV3?	
	their improvement will be permitted unless: (a). an alternative and	As currently worded, the grammar of part b) of the policy is	
	improved provision is provided that retains its original functional	confusing: 'Only developmentwill be permitted unless (b) the	
	requirements for existing and future users; and (b). the proposal	proposal would not result in the loss of'	
	would not result in the loss of an area important for its amenity or	It is not entirely clear what is intended here.	
	contribution to the character of the area in general.		
	Dev Map 1	This is a useful map to help set the context for the NP	Noted
Tpt2	Policy Tpt2	This is not really a policy and should be moved to supporting text.	Noted and moved to supporting text
	Employment policies	The employment policies are welcomed as adding appropriate local	New Map produced.
		detail to JLP policy. However, clearer identification of the relevant	
		sites on one single map is recommended.	
		Have site assessments been carried out to assess the impact of	See general comment 8 above.
		development on these sites – particularly the 'site of approximately	
		2.5 Ha in the vicinity of Dodovens Farm/Chittleburn Business Park'?	
		No such assessments have been seen by the LPA, and are	
		recommended in order to demonstrate deliverability of the NP.	
Dev1	Policy Dev1 Development shall not harm but maintain and enhance		Policy wording amended
	the South Devon AONB and its setting, paying full regard to national	This policy repeats the requirements of Policy Env1 and as such is	
	and local strategic policies for the AONB and to the South Devon AONB Planning Guidance.	not considered necessary.	
Dev2			Noted
Dev2	Policy Dev2 Location, scale and character of development.  (a) Within the settlement boundary the scale, density and character		Noted
	(a) Within the settlement boundary the scale, density and character of development shall be in keeping with its site and surroundings and	The provisions of this part of the policy are already well provided for	
	shall cause no adverse impacts on natural or historic assets,	in existing planning policy. As such, this part of the policy is not	
	important views, outlooks or skylines, local amenity, traffic, parking or	considered necessary.	
	safety		
Dev2		This part of the policy is contrary to JLP TTV31, which supports	This section of the policy removed
DeV2		housing and employment development for local needs only adjacent	This section of the policy removed
	Policy Dev2	or very close to existing settlements. Isolated development	
	(b) Elsewhere in the parish development will be strictly controlled and only permitted where it is small scale (1 - 2 dwellings) and can be	elsewhere is only supported in very specific circumstances, such as	
	delivered sustainably and not in conflict with any other policy.	to meet the needs of a rural worker. As currently worded, the NP	
	delivered sustainably and not in connect with any other policy.	policy is more permissive than JLP TTV31. Unless this is the	
	Policy Dev2	intention, we suggest removing this part of the policy. As above. This is already provided for by JLP TTV31 where the	
Dev2	(c) In the event that a future Housing Needs Survey identifies the	proposed development is adjacent or very close to existing	Policy wording amended
	need for essential, affordable local housing for Brixton community,	settlements. As currently worded, the NP policy is more permissive	
	small numbers of sensitively located, well designed housing, might	than JLP TTV31. Unless this is the intention, we suggest removing	
	be considered within the Parish outside the AONB.	this part of the policy.	
Dev2	Policy Dev2	As above. In addition the wording 'essential local need' potentially	Reference to local need removed.
	(d) Small scale development that secures a viable long- term future	creates confusion. What is intended here? This could be interpreted	
	for a valued local asset which would otherwise be lost, or will meet an essential local need which could not otherwise be met may be	as need for several affordable houses, or in several other ways.  Again we suggest removing this part of the policy which is already	
	permitted	covered by TTV31.	
Dev3	Dev3. All new development should be of high quality and		Policy retained to emphasise the requirement for good design
	appropriately designed for the context in which it is proposed with		which has been lacking in recent developments.
	respect to its neighbours and the rural character of Brixton village		
	and Parish. Development shall take into account topography, layout,	What does this policy add to JLP DEV10 and Dev20? NPs should	
	building orientation, massing, landscaping, public green space and	avoid repeating existing/emerging policy wherever possible.	
	associated public realm, to minimise visual, ecological and social impact. Housing will comply with the Department of Communities &		
	Local Government "Technical housing standards – nationally		
	described space standard."		
Dev4	Dev4. Design shall maximise, where possible, the orientation of new		Policy retained and updated to emphasise the requirement fo
	development to capitalise on solar energy and other natural		good design which has been lacking in recent developments.
	sustainable resources to reduce energy consumption. Development	As above – does this policy add significantly to JLP DEV34?	
	comprising the use of renewable energy and low carbon materials	, , , , , , , , , , , , , , , , , , , ,	
	will be encouraged where it does not harm the character and appearance of the Parish and the landscape.		
Dev5	Dev5. All new developments shall include adequate off street parking	This policy is supported, although some clarification of 'adequate' is	Representations to the Parish Council have drawn attention to
-640	and cycle storage for residents, users and visitors. Residential	This policy is supported, although some clarification of 'adequate' is recommended. See NPPE 39 undated in 2015 with the following	the inadequacy of parking provision in new developments. This
	developments shall also provide at least one parking space per	text: "Local planning authorities should only impose local parking	
	bedroom.	standards for residential and non-residential development where	on the pavement and insufficient space for deliveries), social
		there is clear and compelling justification that it is necessary to	tension through lack of parking spaces, and negative visual
		manage their local road network." (written statement: Planning	impact for the residents of, and visitors to, these new housing
		Update March 2015)	schemes.
Dev6	Dev6. Existing Recreation and Tourism facilities shall be retained for		Policy wording amended
	that use. Only development directly associated with and necessary	This policy is supported, but suggest adding wording to the effect	
	for their improvement will be permitted unless: (a) alternative and	This policy is supported, but suggest adding wording to the effect 'Unless it can be demonstrated to be no longer financially viable'.	
	improved provision will be made in a location well related to the	Sinces it can be demonstrated to be no longer intancially viable.	
	functional requirements of the use and its existing and future users;	There appears to be text missing at the end of part (b)?	
	and (b) the proposal would not result in the loss of an area important		
Dev8	for its contribution to the character of the area in  Dev8. Future development of former Steer Point Brickworks hard		Policy wording amended.
Jevs	standing (refer to Dev Map 2 and Dev Map 3). This large area of		
	previously developed land lies within a highly sensitive area of the	More detail would be welcomed here as to what might be considered	What will be acceptable in relation to any forthcoming planning application will be judged on its individual merits and
	AONB. Only development proposals to enhance this site and provide	acceptable development for this site and what sort of community benefits are aspired to and might be realised from the site.	assessment of significant community benefit.
	significant overall community benefit in this special location will be	perients are aspired to and might be realised from the site.	
	considered.		

Appendix 1



# South Hams and West Devon Strategic Development Plan Policies December 2017

This document sets out the strategic development plan policies which neighbourhood plans in South Hams and West Devon should demonstrate conformity with, as at December 2017.

#### Contents

Introduction

- 1. The Emerging Plymouth and South West Devon Joint Local Plan (JLP)
- 2. South Hams District Council Development Plan Strategic Policies December 2017
- 3. West Devon Borough Council Development Plan Strategic Policies December 2017

#### Introduction

Neighbourhood plans must be in conformity with the strategic elements of the Local Development Plan that is extant at the time of the examination of the neighbourhood plan. As at December 2017, the extant Local Development Plans for the two Districts are the South Hams Core Strategy 2006 and associated documents, and the West Devon Core Strategy 2011 and associated documents. Further detail on these documents and the relevant policies is given below in Sections 2 and 3. A new Joint Local Plan for the two Districts and Plymouth is currently being examined and is expected to be adopted in 2018.

#### 1. The Emerging Plymouth and South West Devon Joint Local Plan (JLP)

https://www.plymouth.gov.uk/sites/default/files/PlymouthSouthWestDevonJointLocalPlanSubmission.pdf

Emerging policy should not be referenced in Neighbourhood Plans if the NP is expected to be examined before it is adopted. However, it is important to ensure that NPs are in general conformity with the strategic elements of the emerging JLP and with evidence gathered for the JLP, so that the NP does not become out of date once the JLP is in place.

Relevant sections and policies of the JLP are as follows:

The Vision

The Strategic Objectives

Policy SPT1 Delivering sustainable development



Policy SPT2 Sustainable linked neighbourhoods and sustainable rural communities

Policy SPT3 Provision for new homes

Policy SPT4 Provision for employment floorspace

Policy SPT5 Provision for retail development

Policy SPT6 Spatial provision of retail and main town centre uses

Policy SPT7 Working with neighbouring areas

Policy SPT8 Strategic connectivity

Policy SPT9 Strategic principles for transport planning and strategy

Policy SPT10 Balanced transport strategy for growth and healthy and sustainable communities

Policy SPT11 Strategic approach to the natural environment

Policy SPT12 Strategic infrastructure measures to deliver the spatial strategy

Policy SPT13 European Sites – mitigation of recreational impacts from development

Policy TTV1 Prioritising growth through a hierarchy of sustainable settlements

Policy TTV2 Delivering sustainable development in the Thriving Towns and Villages Policy Area

Policies TTV3 – TTV28 (Main Towns) where relevant

Policy TTV29 Site allocations in the Smaller Towns and Key Villages where relevant

Policy TTV30 Empowering local residents to create strong and sustainable communities where relevant

Policy TTV31 Development in the countryside

Policy DEV1 Protecting health and amenity

Policy DEV2 Air, water, soil, noise, land and light pollution

Policy DEV3 Sport & Recreation

Policy DEV8 Meeting local housing need in the Thriving Towns and Villages Policy Area

Policy DEV9 Meeting local housing need in the Plan Area

Policy DEV10 Delivering High Quality Housing

Policy DEV13 Consideration of sites for Travellers and Travelling Showpeople

Policy DEV14 Maintaining a flexible mix of employment sites

Policy DEV15 Supporting the rural economy

Policy DEV17 Promoting competitive town centres (where relevant)

Policy DEV18 Protecting local shops and services

Policy DEV20 Place shaping and the quality of the built environment

Policy DEV21 Conserving the historic environment

Policy DEV22 Development affecting the historic environment

Policy DEV24 Landscape character

Policy DEV25 Undeveloped Coast and Heritage Coast

Policy DEV27 Nationally protected landscapes

Policy DEV28 Protecting and enhancing biodiversity and geological conservation

Policy DEV29 Green and play spaces

Policy DEV30 Trees, woodlands and hedgerows

Policy DEV31 Specific provisions relating to transport

Policy DEV32 Meeting the community infrastructure needs of new homes

Policy DEV34 Delivering low carbon development

Policy DEV35 Renewable and low carbon energy (including heat)

Policy DEV36 Community energy

Policy DEV37 Managing flood risk and water quality impacts

Policy DEV38 Coastal Change Management Areas

#### 2. South Hams District Council

#### **Development Plan Strategic Policies December 2017**

https://www.southhams.gov.uk/article/3868/Local-Development-Framework

The extant Development Plan for South Hams District as at December 2017 comprises the following documents:

- 2006 Core Strategy including saved policies from the 1996 Local Plan
- 2007 Sherford New Community Area Action Plan (AAP)
- 2008 Affordable Housing Development Plan Document (DPD)
- 2010 Development Policies Development Plan Document (DPD)
- 2011 Site Allocations Development Plan Document (DPD) for:
  - Dartmouth
  - Ivybridge
  - Kingsbridge
  - Totnes
  - Rural Areas

The Council considers the following policies relevant as strategic policies with which Neighbourhood Plans should be in conformity where they are still up to date and in conformity with the National Planning Policy Framework (NPPF). Where policies are not in conformity with the NPPF, the NPPF will take precedence and the relevant NPPF paragraph or section is given.

Policies that the Council considers Neighbourhood Plans should be in conformity with are shaded green in the following table.

Strategic Policy	Conformity required?	Notes
Core Strategy 2006		
CS1, Location of Development	Υ	Not in full conformity with NPPF; however, NPs should have regard to CS1 as it gives an indication of which settlements are considered sustainable by the Council. NPPF Paras 14-15 are also relevant ('Presumption in favour of sustainable development').
CS2, Housing numbers	N	Out of date. Not in conformity with NPPF – relevant section: 6. Delivering a wide choice of high quality homes.  JLP evidence is relevant.
CS3, Employment land provision	Υ	Compliance required though NPs may add detail
CS4, Sherford New Community	N	Where relevant.
CS5, Previously developed land	Y	NPPF 111 permits local targets. No new evidence to suggest a different target, however, the Council suggests flexibility on the 50% figure.



CS6, Affordable Housing	N	Does not conform with NPPF in terms of evidence. NPPF Paras 50 and 54 are relevant.  New JLP evidence suggests 30%		
CS7, Design	Υ	Sets out broad design parameters. NPs may add local detail. DPD1 is relevant.		
CS8, Infrastructure provision	Υ	NPs may add local detail.		
CS9, Landscape and historic environment	Υ	In broad conformity with NPPF. NPs may add local detail. DPD2 and DPD5 are relevant.		
CS10, Nature conservation	Υ	DPD5 is relevant.		
CS11, Climate change	Υ	In broad conformity with NPPF. NPs may add local detail.		
CS12 Tourism	N	NPPF does not advocate a sequential approach for tourism related development. Relevant NPPF sections:  1. Building a strong, competitive economy 2. Ensuring the vitality of town centres 3. Supporting a prosperous rural economy		
CS13, Rural diversification	N	Not in full conformity with NPPF. NPPF Para 28 takes precedence.		
Development Policies DPD				
DPD7, Transport, access and parking	Υ			
DPD8, Open space, sport and recreation	Υ			
DP11, Housing mix and tenure	Υ			
Site Allocations DPD policies where appropriate				

#### 3. West Devon Borough Council

#### **Development Plan Strategic Policies December 2017**

https://www.westdevon.gov.uk/article/3867/Local-Development-Framework

The extant Development Plan for West Devon Borough Council as at December 2017 comprises the following documents:

- 2011 Core Strategy
- Proposals Map
- Settlement Maps
- Saved policies from the 2005 Local Plan Review (as amended 2011)

The Council considers the following policies relevant as strategic policies with which Neighbourhood Plans should be in conformity where they are still up to date and in conformity with the National Planning Policy Framework (NPPF). Where policies are not in conformity with the NPPF, the NPPF will take precedence and the relevant NPPF paragraph or section is given. Evidence produced to support the emerging Joint Local Plan should be taken into account: this is highlighted where relevant.

Policies that the Council considers Neighbourhood Plans should be in conformity with are shaded green in the following table.

Strategic Policy	Conformity Required?	Notes
2011 Core Strategy		
Strategic Policy 1 Sustainable Development	Yes	Sets out sustainable development principles and is in conformity with the NPPF
Strategic Policy 2 Decentralised Renewable and Low Carbon Energy to Supply New Developments	No	Whilst the aspirations of the policy are NPPF compliant, the delivery component of it is not – in that such requirements are likely to be considered so onerous now as to threaten viability and deliverability.  NPPF Section 10 takes precedence, particularly paragraphs 97 and 98.
Strategic Policy 3 Renewable Energy	No	Not fully NPPF compliant: pre-dates the Written Ministerial Statement that requires onshore wind to come forward only on allocated sites in Local or Neighbourhood Plans.  NPPF Section 10 and Written Statement (HCWS42) take precedence.  https://www.parliament.uk/documents/commons-vote-office/June%202015/18%20June/1-DCLG-Planning.pdf



		More up-to-date evidence and guidance is available at https://www.plymouth.gov.uk/jointlocalplanevidencebase
Strategic Policy 4 Infrastructure Provision	Yes	In general conformity with NPPF. See also West Devon Infrastructure Delivery Plan 2015 https://www.plymouth.gov.uk/sites/default/files/WestDevonBoroughCouncilInfrastructureDeliveryPlan.pdf
Strategic Policy 5 Spatial Strategy	No	Partially in conformity with NPPF, but too inflexible on development in the countryside/outside village development boundaries. NPPF Presumption in Favour of Sustainable Development takes precedence, Paras 14-16.
Strategic Policy 6 Density of Housing Development	No	While the NPPF allows for density rates to be set locally, it emphasises local circumstances and appropriate design.  NPPF Paras 47 and 59 take precedence.
Strategic Policy 7 Strategic Distribution of Housing	Yes	Broadly in conformity with NPPF, provided up-to-date evidence still supports these numbers. Evidence is available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 8 Inclusive Communities	Yes except final paragraph (Lifetime Homes Standard)	Largely in conformity with NPPF. Lifetime Homes Standard no longer in use. Housing mix should be based on up-to-date evidence of local needs. For district need see Strategic Housing Market Assessment 2017 https://www.plymouth.gov.uk/sites/default/files/Strategic HousingMarketNeedsAssessmentPart2.pdf
Strategic Policy 9 Meeting Housing Needs	No	Does not conform with NPPF in terms of evidence. NPPF Paras 50 and 54 are relevant. New JLP evidence suggests 30% - see JLP Dev8 for detail. See <a href="https://www.plymouth.gov.uk/sites/default/files/StrategicHousingMarketNeedsAssessmentPart2.pdf">https://www.plymouth.gov.uk/sites/default/files/StrategicHousingMarketNeedsAssessmentPart2.pdf</a>
Strategic Policy 10 Supporting the Growth of the Economy	Yes	The objective of this policy is in conformity with the NPPF, though the NPPF gives more detail on an expected strategy for plans. NPPF Paras 18-22 are relevant. Up-to-date evidence is available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 11 Rural Regeneration	Yes	In broad conformity with NPPF.
Strategic Policy 12 Retailing	Yes	In broad conformity with NPPF. See SPD 'Assessing the Impact of New Retail Development in West Devon' 2013 and evidence at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>

REGULATION 14 CONSULTATION APPENDIX 3

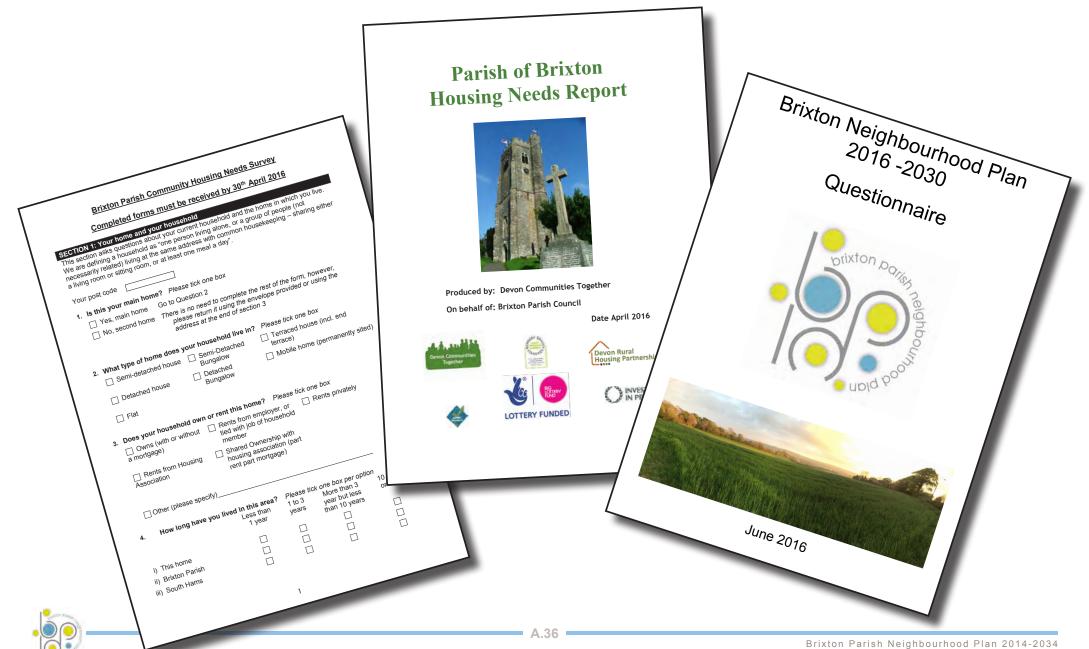
Strategic Policy 13 Community Services and Facilities	Yes	In broad conformity with NPPF. Up-to-date evidence available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 14 Accessibility Planning	Yes	In broad conformity with NPPF. Up-to-date evidence available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 15 Traffic Management	Yes	In broad conformity with NPPF. Up-to-date evidence available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 16 Safer Communities	Yes	In conformity with NPPF.
Strategic Policy 17 Landscape Character	Yes	In broad conformity with NPPF. Up-to-date evidence available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 18 The Heritage and Historical Character of West Devon	Yes	In broad conformity with NPPF. Up-to-date evidence available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 19 Biodiversity	Yes	In broad conformity with NPPF. Up-to-date evidence available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 20 Promoting High Quality Design	Yes	In broad conformity with NPPF, although NPPF also references distinctive and innovative design (para 63, 65) and community involvement. NPPF Paras 56-68 are relevant. Up-to-date evidence available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 21 Flooding	Yes	NPPF paras 102-104 are relevant
Strategic Policy 22 Okehampton	No	Up-to-date evidence is available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 23 Tavistock	No	Up-to-date evidence is available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 24 Sustainable Rural Communities	No	Up-to-date evidence is available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>



COMMUNITY CONSULTATION APPENDIX 3

These documents and other supporting evidence of community consultation can be viewed at:

http://www.brixtonparishcouncil.org.uk/Neighbourhood\_Plan



COMMUNITY CONSULTATION APPENDIX 3

