

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

Policy	Consultee	Comment	BNP 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 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 "l" 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	

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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 this 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	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>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.</p> <p>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 Parts 73 and 74. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Planning Policy Statement: 'A Sporting Future for the Playing Fields of England'. http://www.sportengland.org/playingfieldspolicy</p> <p>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 is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p>	<p>Noted</p> <p>Noted. Refer to Brixton Parish Sport and Recreation Plan</p>

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		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 turn, 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
		<p>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/</p> <p>Any new housing 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.</p> <p>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.</p> <p>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.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign</p> <p><i>(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.)</i></p>	<p>Noted</p> <p>Noted</p>
	South West Water	Thank you for this the content of which is noted.	Noted

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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 of 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 that becomes fair game for further development.	The land east of Lodge Lane comprises 2 small fields confined between the existing house, Elmsleigh, 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 BNPP group concerning land ownership enquiries as was explained when this issue arose in 2016.
		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 BNPP as this is being dealt with within the Sherford development Plan. This includes a comprehensive proposal for public access.

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		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.
		<p>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 18 (which has been diverted around the farmyard without consent). Page 30 shows a map please improve this map to include the whole of Brixton Parish.</p> <p>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 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.</p> <p>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.</p>	<p>This lane will remain as part of the Highway and maintain and improve/facilitate much needed public access to Sherford.</p> <p>Tpt Map1 on page 30 has been included for the purposes of illustrating improved or new access to Sherford and Plymouth</p> <p>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 discussion with Plymouth City Council (owners) and the Sherford Liaison Group</p> <p>We suggest this proposal could be addressed as part of Parish Project Action Plan 1.</p>
		Employment Areas	

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		<p>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?</p> <p>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 Gentian 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.</p>	<p>Protecting specific employment areas is the purpose of this policy to avoid loss of important employment use.</p> <p>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</p> <p>Refer to the Office of National Statistics data.</p>
		Sport and Recreation	
		<p>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.</p>	<p>The Sport and Recreation Plan will set out ideas for Section 106 Funding.</p> <p>Cofflete Mill site will be subject to community consultation.</p>
		Community Facilities	
		<p>The parish severely lacks any property assets which could be used to benefit the parish, opportunities to purchase land etc 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 poorly 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.</p>	<p>Refer to previous comments</p>
		<p>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 Brixton 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.</p>	<p>The reference to Brixton Campsite as a community facility will be removed.</p> <p>Noted</p> <p>Noted</p>
		Renewable Energy	

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		<p>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.</p> <p>Finally thank you to all of those compiling the plan and apologies for perhaps digressing on some points. I hope that 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)</p> <p>Best Regards Martyn Oates</p>	<p>The Policy wording has been reconsidered and amended accordingly.</p> <p>Your comprehensive response is noted and has been circulated as requested.</p>
	Jo Lynn	<p>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.</p> <p>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.</p> <p>Fingers crossed for good reception from parishioners and local council.</p> <p>Regards Jo Lynn</p>	Constructive comment
	Roger Hephher 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:	
		1. DevMap2 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.	<p>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.</p> <p>To include the whole of the disused quarry site would be out of scale within the setting of the AONB and scale of Brixton village.</p>
		2. 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.	Dev8 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 be to the highest standard and reflect our own policy Dev3.
		We will be happy to elaborate upon these representations should you find this helpful.	
		Kindly acknowledge receipt of this email (done) Roger Hephher, 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	

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	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... <i>build a community that will be resilient to future economic downturns, rising energy prices and climate change.</i>	Noted
		Objectives - These all look good. The reference to renewables is positive but I feel it could be strengthened broadened to include energy efficiency projects if it was part of a wider statement around <i>'initiatives that support transition to a low carbon future'</i>	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 clarity I think extra explanation is required as to why you have separate 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 setting. 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 <i>'provide for or provide s106 contribution towards'</i> 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: Dev8.
		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	BNPP 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 level 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 Parish Project Action Plans, illustrated by projects such as 8 & 9 identified on pA.29.	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 2.5ha 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 https://historicengland.org.uk/listing/the-list/map-search 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	
	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	BNPP Group Response
		Below are comments in response to representations on behalf of developers. The full documents are online.	http://www.brixtonparishcouncil.org.uk/Neighbourhood_Plan_2016_4508.aspx
	Emery Planning	INTRODUCTION Paragraph 1.2	We disagree with the comment on prematurity. The BNPP 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	BNPP 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 BNPP 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.

Policy	Consultee	Comment	BNPP Group Response
			Ref to Introduction, page 7 reference Neighbourhood Planning and Development. To be added to the document for clarification: <i>"Throughout the document, the term 'neighbourhood plan' refers to a 'Neighbourhood Development Plan', as introduced by the Localism Act 2011."</i>
		Paragraph 2 and bullets, Paragraph 3	Disagree, BNPP complies with the basic conditions.
		Paragraph 4	With particular regard to the NPPF (national), the BNPP 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	BNPP 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: <i>"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."</i>
		Paragraph 9 and 10	As above
		Paragraph 11	Disagree for reasons stated above. The BNPP 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.