

APPENDICES

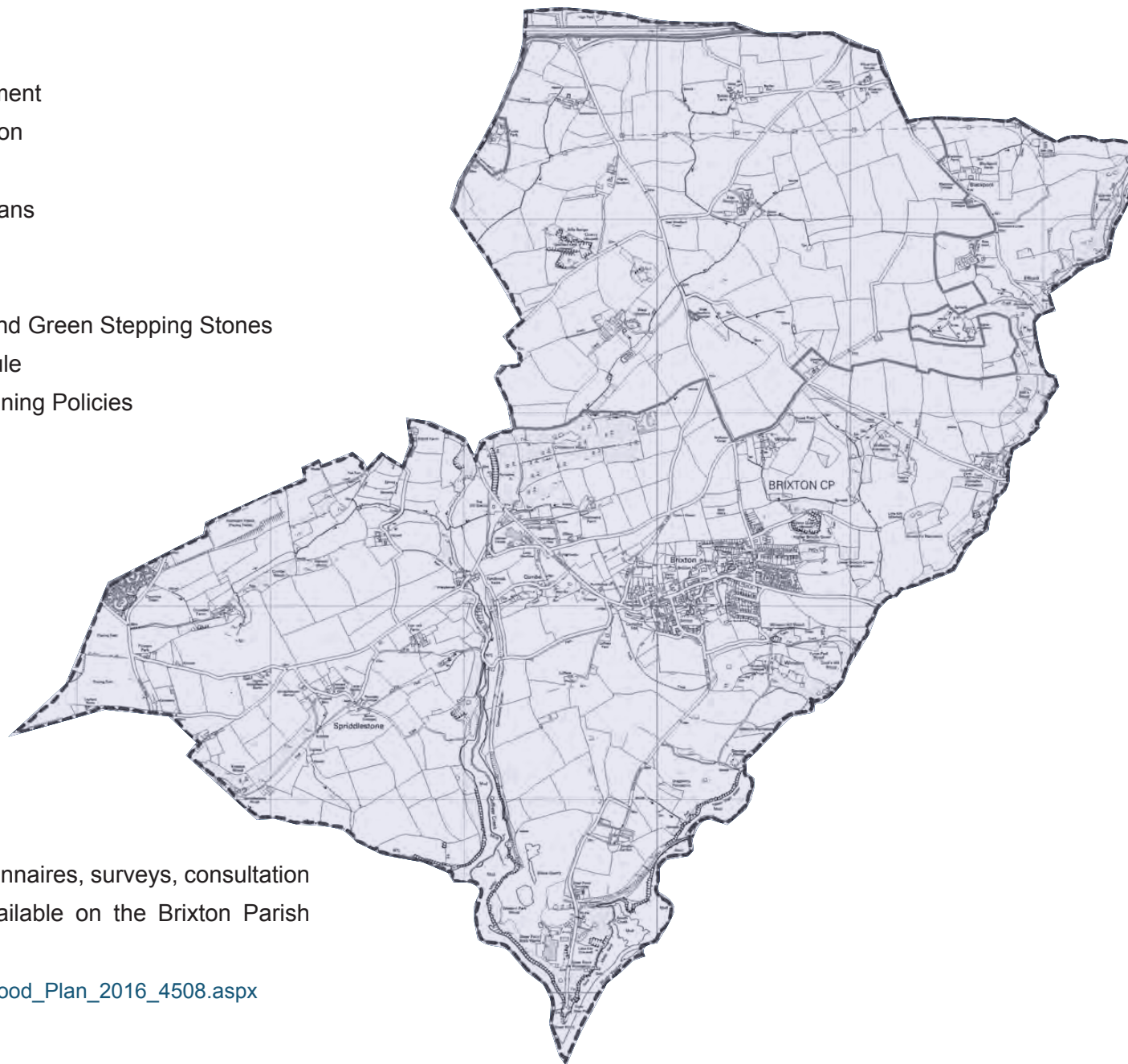


BRIXTON PARISH NEIGHBOURHOOD PLAN 2014-2034



APPENDICES






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The Appendices and a definitive list of questionnaires, surveys, consultation events and their subsequent results are available on the Brixton Parish Council website:

http://www.brixtonparishcouncil.org.uk/Neighbourhood_Plan_2016_4508.aspx



Brixton Neighbourhood Plan	 Application Form Proposed Neighbourhood Plan Area for Brixton [69kb]	http://www.brixton-village.co.uk/parishcouncil.htm
	 Brixton Neighbourhood Plan Supporting Statement [189kb]	
	 Brixton Parish Neighbourhood Plan Terms of Reference [409kb]	
	 Proposed Neighbourhood Plan Area for Brixton [3Mb]	
	<p>This area was approved by delegated authority on 26th June 2015. The area follows the parish boundary, but excludes the allocated development site for Sherford. The report to approve the delegated approval for this area can be seen below:</p>	
	 Brixton Area Approval Designated Decision Report [307kb]	

Designation of Plan Area Application Form



Name of Applicant - *Must be a Parish or Town Council*

Brixton Parish Council

Contact Details - *Please supply contact details of project lead*

Name: Dr David Croot

Address:

Email:

Tel:

Name of proposed plan area

Brixton Parish Neighbourhood

Map of proposed plan area

Please supply a separate map showing the boundaries of the proposed plan area

Statement confirming why the proposed plan area is appropriate

Please explain why the plan area is an appropriate designation, continue on a separate sheet if necessary.

Please see separate sheet.

Type of plan proposed - *Please tick*

☒ Neighbourhood Development Plan

☐ Community Plan

☐ Plan-It Lite

☐ Neighbourhood Development Order

☐ Community Right to Build Order

Group Terms of Reference

Please supply a separate sheet detailing the Group's Terms of Reference

Please return to the Strategic Planning Team,
South Hams District Council, Follaton House,
Plymouth Road, Totnes, Devon, TQ9 5 NE.



Statement explaining why the proposed plan area for Brixton Parish Neighbourhood Plan is appropriate.

The proposed plan area comprises most of the current County Parish of Brixton, within the South Hams, Devon.

The parish has borders with the County Parishes of Wembury, Newton Ferrers and Noss Mayo and Yealmpton to the south and east and the City of Plymouth to the west and north. The northern boundary of the parish is contiguous with the A38 dual carriageway.

The northern portion of the current parish of Brixton is designated for the new town of Sherford which will have its own Town Council within the time period covered by this Neighbourhood Plan; responsibility for the implementation of its own Neighbourhood Plan will therefore rest with that Council and associated bodies.

It is therefore proposed that the Neighbourhood Plan for Brixton shall cover the current parish (outlined in blue on the attached map) and exclude the area designated as Sherford New Town (outlined in red on the attached map). The blue and red boundaries shown on the attached map are taken from the local Area Action Plan and Local Development Framework (2006-2016). These will be consistent through the evolution of the emergent South Hams Local Plan which will cover strategic planning in the area up to 2031.

The proposed plan area is largely rural and agricultural in character. It includes part of the South Devon AONB, the village of Brixton and its surrounding hamlets, as well as Carrolsland on the far western boundary.

The plan area is congruent with current electoral ward boundaries and formal and informal networks of community based groups.

Brixton Parish Neighbourhood Plan

• Terms of Reference

The Brixton Parish Neighbourhood Plan Group (BPNPG) has been established by Brixton Parish Council to develop the Brixton Parish Neighbourhood Plan through processes which will include engaging with the whole parish community, key stakeholders (eg landowners, business leaders, South Hams District Council). The BPNPG is an autonomous group which is accountable to the Parish Council.

• Membership.

Membership is open to all members of the community who reside within the parish of Brixton.

• Conduct of Meetings

Meetings will be held fortnightly.

Meetings will be quorate providing that a total of four individuals are present. If these conditions are not met, business may proceed but no vote may be taken.

A member shall be appointed by the Group to the position Chairperson.

All members shall declare any interests defined as:

- Land ownership or land occupation within the Plan Area.
- Land ownership (larger than room for an extension to a residential property) or occupation by an immediate relative.
- In active negotiations to purchase development land within the Plan Area.
- In business partnership or having close links with a local developer.
- Land Ownership adjacent to or bordering a potential development site.

Declaring an interest does not prevent an individual from voting: it merely reinforces the openness of the process and prior to any vote the Plan Group will be asked to confirm or update their declaration.

Voting will be based on a simple majority of those present and entitled to vote. In the case of a tied vote the issue will be referred to Brixton Parish Council as the accountable body.

• Records of Meetings.

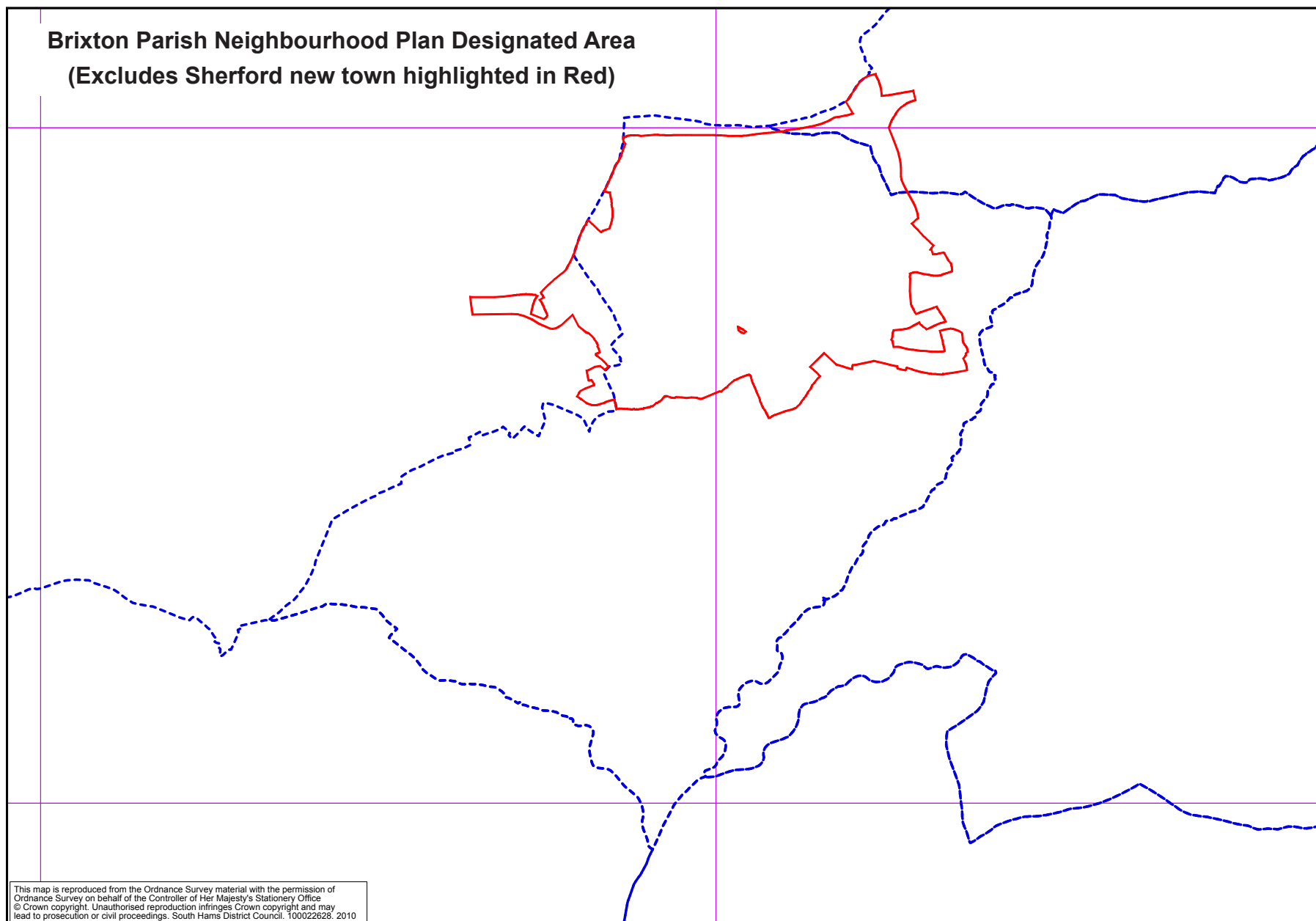
Notes and actions will be recorded and circulated to all Group members electronically and will be made publically available electronically on sites that are accessible to all. Any comments on the records of meetings will be discussed at the following meeting, resolved and accepted.

Any discussion by or documentation received or produced by the Group shall be freely open to all, unconstrained by any confidentiality restrictions other than any obligations of the Data Protection Act. Where that restriction is in place it is to be explicitly stated as the reason for confidentiality.

• Reports and Recommendations to the Parish Council.

The records of meetings will be circulated to the Clerk to the PC on a monthly basis. The Neighbourhood Plan Group will be a standing item on the Parish Council Agenda for the duration of the project.





TERMS OF REFERENCE

Neighbourhood Plan Area Designation for Brixton



Neighbourhood Plan Area	Brixton
Date application submitted	8 th May 2015
Delegated decision date	26 th June 2015
Outcome	Plan area is approved

Background:

Brixton Parish Council submitted an application to the Council to designate a plan area in respect of preparing a Neighbourhood Development Plan. A map showing the proposed plan area can be viewed <http://www.southhams.gov.uk/shneighbourhoodplans>

The application was advertised for six weeks between 8th May 2015 and 19th June 2015 during which comments were invited about whether the plan area is appropriate.

Responses were received from:

- Newton & Noss Parish Council
- Environment Agency
- Gladman Developments
- Natural England
- South West Water
- Historic England

The Council has not received any objections to the designation of the plan area proposed.

Issues for consideration

- 2.1 Brixton PC submitted an application to the District Council in May 2015 to designate the area that they intend their neighbourhood plan to cover. This area covers the extent of the parish boundaries of Brixton parish, but excludes the area already designated for the development of Sherford, as this is already subject to a planning permission and legal agreement.
- 2.2 The application is accompanied by a Terms of Reference for the group that will be responsible for leading the process in Brixton. This group has been endorsed by Brixton Parish Council. The Terms of Reference for the group can also be viewed online.
- 2.3 The application has been displayed throughout the parish area through the use of pink site notices and the opportunity to comment on the proposed designation has been publicised on the Parish Council website, through the local publicity, and a public meeting.
- 2.4 The Council received six representations during the consultation period. None of these bodies object to the proposed plan area.
- 2.5 As such, it is considered that the plan area is appropriate and can be designated for the purposes of preparing a neighbourhood plan for Brixton.

RECOMMENDATIONS:

It is recommended that

- The consultation responses received in respect of the application are noted; and
- The designation of the Brixton Plan Area for the purposes of preparing a Neighbourhood Plan is approved.

APPENDIX 1

Ward Member: Cllr Basil Cane
Comments: I am happy with the Brixton neighbourhood designated area plan . If any area is highlighted in my ownership i will declare a prejudicial interest and take no further part.
Date: 25 th June 2015

Ward Member:
Comments: I would like to state that I have no objection to the NP boundary. I actively support Brixton pursuing a neighbourhood plan.
With kind regards
Councillor Daniel Brown
Date: 24 th June 2015

Leader of the Council:
Comments: Dear Phil Very happy to support your recommendation John John Tucker (Cllr) Leader West Dart Ward South Hams District Council
Date: 25 th June 2015

Group Manager (Customer First): Tracey Beeck
Comments: Morning Phil, I'm happy to support this designation. Kind regards Tracey
Date: 25 th June 2015

Officer contact:

Phil Baker | Specialist (Place & Strategy)
01803 861210



BRIXTON PARISH NEIGHBOURHOOD PLAN

Basic Conditions Statement

Brixton Parish Neighbourhood Plan

Submitted by the qualifying body:

Brixton Parish Council

brixtonpc@talktalk.net <http://www.brixtonparishcouncil.org.uk>

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1. Legal Requirements
2. Local context and the need for a plan
3. Plan process and consultation
4. Vision and objectives
5. Policies and proposals
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9. Achievement of sustainable development
10. Conformity with strategic policies of the development plan
11. Compatibility with EU legislation

ANNEXES

Annex 1 Policies' regard to the NPPF and general conformity with the strategic policies of the development plan

Annex 2 – Compatibility with EU legislation



BASIC CONDITIONS STATEMENT

1.0 LEGAL REQUIREMENTS

- 1.1. This statement has been prepared by the Brixton Neighbourhood Plan Group on behalf of Brixton Parish Council. It accompanies the submission to South Hams District Council of the Brixton Neighbourhood Development Plan under section 15 of the Neighbourhood Planning Regulations 2012.
- 1.2. The Neighbourhood Plan is submitted by Brixton Parish Council, the appropriate qualifying body. It covers the area designated by South Hams District Council on 15th July 2015. Details of the application and its approval are available on the district council's website at:
<http://old.southhams.gov.uk/shneighbourhoodplans>.
- 1.3. The plan has been prepared on behalf of the Parish Council by a coordinating group with assistance from a planning consultant. The assistance of the District Council is also gratefully acknowledged.
- 1.4. The plan relates to planning matters (the use and development of land) in the designated neighbourhood area. It covers the period from 2014-2034, a period chosen to tie in with the emerging new development plan for the South Hams.
- 1.5. It does not contain policies relating to excluded development – county matters, nationally significant infrastructure or other matters – as laid out in the Regulations.
- 1.6. The designated neighbourhood plan area is shown on the map in Appendix 1. It includes the whole of Brixton parish, but excludes the new town of Sherford.
- 1.7. The following statement addresses each of the four 'basic conditions' required by the Regulations and explains how the neighbourhood plan meets the requirement of paragraph 8 of schedule 4B of the 1990 Town and Country Planning Act.
- 1.8. The Regulations state that the neighbourhood plan will have met the basic conditions if it:
 - a. has regard to national policies and Secretary of State guidance;
 - b. contributes to the achievement of sustainable development;
 - c. is in general conformity with the strategic policies of the development plan for the area; and
 - d. is compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

APPENDIX 2

2.0 LOCAL CONTEXT AND THE NEED FOR A PLAN

- 2.1. Brixton is a rural parish lying adjacent to the eastern boundary of Plymouth. The parish population is less than 2,000 people.
- 2.2. The parish has experienced considerable pressure from developers to expand housing, particularly in the village of Brixton. The rate of growth of housing in the village since 2014 has been 25% and has resulted in a cumulative impact on the rural character of the village, against the requirements of the Local Development Framework and the emerging Joint Local Plan.

3.0 PLAN PROCESS AND CONSULTATION

- 3.1. The district council confirmed the area to be covered by the plan in July 2015.
- 3.2. A working group chaired by the chair of the Parish Council organised Public events, questionnaire surveys and open days for consultation, and a dedicated web page has been launched.
(http://www.brixtonparishcouncil.org.uk/Neighbourhood_Plan_2016_4508.aspx)
- 3.3. All this activity has drawn out a great deal of local information and opinion which has helped to shape the plan, which is now published.

4.0 VISION AND OBJECTIVES

- 4.1. The plan is based on the Vision produced by the local community:
- 4.2. Brixton parish offers the opportunity to embrace village and rural life: a sense of community, tranquillity, a safe environment with public green spaces and beautiful landscapes. Our community benefits from both the South Devon Area of Outstanding Natural Beauty and the close proximity to the historic port city of Plymouth, with all the advantages of connectivity, culture, educational facilities, heritage, employment, sport and commerce.
Our vision is:
 - to conserve and enhance the rural and historic environment of Brixton parish, with its beautiful landscape of woods, farmland and estuary;
 - to retain the identity and independent character of Brixton village and its surrounding hamlets;
 - to nurture thriving communities across the parish by providing improved facilities and taking opportunities to meet the needs and wishes of the community.



BASIC CONDITIONS STATEMENT

- 4.3 The plan's objectives and policies have been set in response to the priorities identified by the local community under 6 themes:

Environment

Transport

Employment

Community Facilities

Sport and Recreation

Development

5.0 POLICIES AND PROPOSALS

- 5.1. The plan's policies respond to the community's priorities and seek to establish a basis for support to the parish's sustainable growth and to conserve and enhance assets.
- 5.2. The policies fall under the six themes. They include policies to protect the AONB, other sensitive areas and important local assets, foster good design and construction, enable business development, infrastructure and the vitality of the local community.

6.0 SUBMISSION DOCUMENTS

- 1.1. The following documents have been prepared to support the Brixton Neighbourhood Plan.
- a) The Neighbourhood Plan – the neighbourhood development plan for the designated area containing policies to guide future development in the area.
 - b) The Statement of Consultation – setting out the community engagement and consultation undertaken from the outset of the process.
 - c) The Strategic Environmental Impact (SEA) and Habitats Regulations Assessment (HRA) Screening Opinions – setting out the view of the local planning authority (South Hams District Council) as to whether SEA or HRA are required.
 - d) The Monitoring Framework – outlining a framework of performance indicators against which the effectiveness of the plan's policies can be assessed.
 - e) The Evidence Summary – listing the key sources for evidence (other than community consultation) to underpin the plan.



APPENDIX 2

7.0 COMPLIANCE STATEMENT

- 7.1. The draft Brixton Neighbourhood Plan was made available for consultation from mid November 2017 for six weeks in accordance with Part 5, Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.
- 7.2. Responses to the comments received are set out in a Response Report which will be submitted to South Hams District Council. Summaries of the responses received and copies of those from key consultees will be posted on the BPNP website.
- 7.3. Following consultation on the draft plan any amendments considered to be necessary have been made and the revised plan is now submitted to South Hams District Council. Part 5, Paragraph 15 of the Regulations sets out the requirements for the submission of a neighbourhood plan, as follows:

Plan proposals

Where a qualifying body submits a plan proposal to the local planning authority, it must include –

- (a) a map or statement which identifies the area to which the proposed neighbourhood development plan relates;
- (b) a consultation statement;
- (c) the proposed neighbourhood development plan; and
- (d) a statement explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Act.

The map and the application notice of designation of the Brixton Neighbourhood Plan area can be found at: www.southhams.gov.uk/article/3882/Neighbourhood-Plans.

- 7.4. Application and designation notice. Parts (b) and (c) are now published alongside the plan and will be finalised as part of the plan's submission. The requirements of part (d) are that the plan meets the basic conditions which are (as set out at para 1.8 above), that:
- the plan has regard to national policies and advice contained in guidance issued by the Secretary of State.
 - the plan contributes to the achievement of sustainable development.
 - the plan is in general conformity with the strategic policies contained in the development plan for the area.
 - the plan does not breach and is compatible with EU obligations.
- 7.5. The following sections of this statement explain how the Brixton Neighbourhood Plan meets those requirements.

BASIC CONDITIONS STATEMENT

8.0. REGARD TO NATIONAL POLICIES AND GUIDANCE

- 8.1. The National Planning Policy Framework (NPPF) was published in March 2012. It provides a framework for planning for sustainable development, including by local communities through the production of neighbourhood plans.
- 8.2. The Brixton Neighbourhood Plan aims to focus on those planning matters which have been identified as priority concerns by the local community. It seeks to neither hinder nor duplicate policies in existing plans, which should be read alongside the neighbourhood plan. Both independently of one another and in combination the plans meet the requirements of the NPPF.
- 8.3. **Annex 1** sets out the way that the policies of the plan conform with the NPPF.

9.0. ACHIEVEMENT OF SUSTAINABLE DEVELOPMENT

- 9.1. The Plan's objectives are set squarely within the bounds of sustainable development. It provides for:
 1. economic sustainability through its provisions for development, job creation and protection,
 2. social sustainability through its support for maintenance and development of community infrastructure and housing development; and
 3. environmental sustainability through its promotion of sustainable construction and care of local heritage, green spaces and natural resources.
- 9.2. Sustainability is a key aspect of the plan, and in particular of the following policies:
 1. Env1 and Dev 1 – AONB protection and sustainable design
 2. Env3 – Priority habitats
 3. Env 4 – Green corridor
 4. Env 5 - Local Green Spaces
 5. Env 8 and Dev 4 – Renewable energy
 6. Sar 1 – Sport and recreation spaces
 7. Tpt 1 – Sustainable Transport
 8. Dev 2 – Housing design and standards

APPENDIX 2

10.0 CONFORMITY WITH STRATEGIC POLICIES OF THE DEVELOPMENT PLAN

- 10.1. The development plan for the area is set to be the Plymouth and South West Devon Joint Local Plan (the JLP). Until that plan's final adoption the development plan also includes the South Hams Local Development Framework (LDF) Core Strategy (2006), Affordable Housing DPD (2008), Development Policies DPD (2010), and a series of Site Allocations DPDs, including one for the Rural Areas including Brixton (2011) plus a number of saved policies from the South Hams Local Plan (1996). Several adopted Supplementary Planning Documents (SPDs) provide further detail.
- 10.2. The Brixton Parish Neighbourhood Plan has been prepared in co-operation with the District Council. The Plan conforms with and does not undermine or constrain the strategic content of the emerging JLP or adopted LDF and saved local plan policies inasmuch as they relate to Brixton parish.
- 10.3. More detail about the way in which the Plan's policies generally conform with the strategic content of the development plan policies is set out in Annex 1 (along with details of conformity with the NPPF).

11.0 COMPATIBILITY WITH EU LEGISLATION

- 11.1. The Brixton Parish Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. The consultation process has strived to include all sections of the community, including hard-to-reach and under-represented groups such as young people and the disabled.
- 11.2. Screening opinions have been provided by South Hams District Council in relation to Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). In consideration of the SEA, amendments have been made to the draft Plan to enable the draft screening report to be updated to conclude that a full SEA is not needed. Assessment under the HRA was deemed not required. Refer to Appendix 2, **Annex 2**.
The full screening option is available to view at:
http://www.brixtonparishcouncil.org.uk/Neighbourhood_Plan_2016_4508.aspx



ANNEX 1 – BRIXTON NEIGHBOURHOOD PLAN POLICIES REGARD TO THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF) AND GENERAL CONFORMITY WITH STRATEGIC POLICIES OF THE DEVELOPMENT PLAN

The table below maps the policies of the Brixton Neighbourhood Plan, their regard for the National Planning Policy Framework (NPPF) and their general conformity with the strategic policies of the development plan for the area.

Brixton Neighbourhood Plan	Regard to NPPF	General conformity with strategic policies
Overall	<p>The plan has regard to the NPPF and particularly to the objectives for neighbourhood plans and in the achievement of sustainable development.</p> <p>It sets out a vision for the future and contains policies which respond to priority concerns expressed by the local community.</p> <p>It sets out a strategy that provides for sustainable development within its area.</p> <p>Its policies align with the NPPF in general and in particular ways as shown below.</p>	<p>The plan is in general conformity with the strategic policies of the development plan and in particular those contained in the South West Devon Joint Local Plan 2017 (the JLP) and the South Hams LDF Core Strategy 2006 (the LDF).</p> <p>JLP policy TTV30 is of key relevance.</p>
Settlement Boundaries (Dev 2)	<p>The policy has regard to NPPF core principles to support thriving rural communities, recognise the intrinsic character and beauty of the countryside, conserve and enhance the natural environment and encourage effective use of land.</p> <p>It clearly sets out where sustainable development can be located, to meet local needs and help support a prosperous local economy (NPPF part 3).</p>	<p>The policy generally conforms with JLP policies SPT1, SPT2, SPT3, SPT11, TTV2, TTV31 and LDF policies CS1 and CS13.</p>
Environment (Env1-6)	<p>The policy has regard to NPPF core principles to conserve and enhance the natural environment taking full account of flood risk and coastal change.</p>	<p>The policy generally conforms with JLP policies TTV1, TTV30, TTV31, SPT11, DEV2, DEV24, DEV25, DEV26, DEV28, DEV30, DEV35, DEV36, DEV37 and DEV38.</p>

APPENDIX 2

	<p>It helps to meet the challenges of climate change, flooding and coastal change and to conserve and enhance local landscapes, geology, soils, ecosystems and biodiversity (NPPF part 10).</p>	<p>It also generally conforms with LDF policies CS9, CS10 and, CS11.</p>
Location, scale, character, housing design standards (Dev 2 and 3)	<p>The policy has regard to NPPF core principles to secure high quality design and a good standard of amenity, and to protect and conserve environmental and heritage assets.</p> <p>The policy requires that development be distributed and designed with due regard to the character of the localities (NPPF part 7).</p> <p>The policy has regard to NPPF core principles to always seek to secure high quality design and support the transition to a low carbon future.</p> <p>It aligns with NPPF part 7 (requiring good design) and part 10 (meeting the challenge of climate change, flooding and coastal change).</p>	<p>The policy generally conforms with JLP policies SPT1, SPT2, DEV2, DEV8, DEV10, DEV20, DEV24, DEV34, and DEV35.</p> <p>It also conforms with LDF policy CS7. It also conforms with LDF policy CS7.</p>
Transport (Tpt 1)	<p>The policy has regard to NPPF core principles to promote sustainable transport, good design and healthy communities.</p>	<p>The policy generally conforms with JLP policies SPT10 and DEV31.</p>
Planning Obligations and Commuted Sums (Cof2)	<p>The policy has regard to NPPF core principles and in particular paras 203-206.</p>	<p>The policy generally conforms with JLP policy DEL1. It also conforms with LDF policy CS8.</p>



Heritage and Conservation (Env6)	The policy has regard to the NPPF core principle to conserve heritage assets and to part 12 (conserving an enhancing the historic environment).	The policy generally conforms with JLP policies DEV21 and DEV22. It also conforms with LDF policy CS9.
Protecting the Landscape (Env4)	The policy has regard to NPPF core principles to recognise the intrinsic character and beauty of the countryside, conserve and enhance the natural environment and encourage effective use of land.	The policy generally conforms with JLP policies DEV20, DEV24, DEV25 and DEV27. It also conforms with LDF policy CS9.
Local Green Spaces (Env5)	The policy has regard to NPPF core principles to conserve and enhance the natural environment and promote healthy communities, particularly paras 76-78.	The policy generally conforms with JLP policy DEV29.
Housing Stock and Local Needs Housing (Dev 3)	The policy has regard to NPPF core principles to deliver needed homes, and in particular to part 6 (delivering a wide choice of high quality homes).	The policy generally conforms with JLP policies SPT2, SPT3, DEV8, DEV9, DEV10, . It also conforms with LDF policies CS1, CS2 and CS6.
Business Premises (Emp 1-3)	The policy has regard to NPPF core principles to proactively drive and support sustainable economic development and part 3 (to support a prosperous rural economy).	The policy generally conforms with JLP policies SPT1, SPT2, SPT4, DEV14, DEV15 and DEV19. It also conforms with LDF policies CS1, CS12 and CS13.
Community Facilities, Sport and Recreation (Cof1-3 & SaR1-3).	The policies have regard to NPPF para 8 paras 69 and 79 to promote healthy communities with opportunities for social interaction	The policies generally conform with JLP policies TTV2 and DEV3
Community Facilities and Infrastructure (Cof2)	The policy has regard to NPPF core principles to deliver sufficient community facilities to meet local needs and part 8 (promoting healthy communities).	The policy generally conforms with JLP policies SPT1, SPT2, SPT6, TTV2, DEV3, DEV4, DEV5, DEV18 and DEV32.

COMPATIBILITY WITH EU LEGISLATION

South Hams District Council (SHDC) provided an initial screening opinion as to whether the draft Brixton Neighbourhood Plan requires a Strategic Environmental Assessment (SEA) or Habitats Regulations Assessment (HRA).

European Obligations and Human Rights requirements:

Strategic Environmental Assessment - SEA Screening Opinion:

Following the initial screening opinion, a Site Assessments for Development report was prepared and submitted to SHDC. On the basis of this document and amendments to the BPNP policy wording SHDC have confirmed that a Strategic Environment Assessment is not required.

Habitats Regulation Assessment - HRA Screening Opinion:

Following the initial screening opinion, and subsequent Site Assessments for Development report, SHDC determined that an Appropriate HRA was necessary.

This assessment has been carried out by SHDC and the results found acceptable.

The Brixton HRA SEA Screening Opinion report for both the Strategic Environment Assessment and Habitats Regulation Assessment is available on the Brixton Parish Council website:
http://www.brixtonparishcouncil.org.uk/Neighbourhood_Plan_2016_4508.aspx

Note: the Site Assessments for Development report is also available on the Brixton Parish Council website:
http://www.brixtonparishcouncil.org.uk/Neighbourhood_Plan_2016_4508.aspx

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 style="list-style-type: none"> Application Form for proposed NP Area for Brixton completed. Sherford will have its own town council 	
May 2015	South Hams District Council	<ul style="list-style-type: none"> Designated area submitted to SHDC for 6 week consultation process. BNPG various meetings with other NP groups and SHDC strategic planning officers to ensure NP is working with the emerging SHDC strategic plan. 			

DATE	CONSULTEE	ACTIVITY	NUMBERS ATTENDED OR CONSULTED WHERE APPLICABLE	KEY ISSUES RAISED	HOW ISSUES WERE CONSIDERED BY NPG
June 2015	Brixton Parish Community	<ul style="list-style-type: none"> NP process presented at Church Fete with opportunity for parishioners to provide initial input. Community invited to view NP Designated Area application online and displayed in various locations around the parish. Comments by 19/6/2015. 	28 people visited display		
24/6/2015	Brixton Parish Council	<ul style="list-style-type: none"> Update on NP progress and intentions to Parish Council Brixton Neighbourhood Plan TORs and group membership approved by BPC. BPC approved designation of BPNP geographical area. 	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		

DATE	CONSULTEE	ACTIVITY	NUMBERS ATTENDED OR CONSULTED WHERE APPLICABLE	KEY ISSUES RAISED	HOW ISSUES WERE CONSIDERED BY NPG
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		

DATE	CONSULTEE	ACTIVITY	NUMBERS ATTENDED OR CONSULTED WHERE APPLICABLE	KEY ISSUES RAISED	HOW ISSUES WERE CONSIDERED BY NPG
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 style="list-style-type: none"> Community Questionnaire and NP Budget update. Councillor Brown emphasised importance of NP putting the parish in strong position on planning matters. 	BPC + 16 members of the public		

DATE	CONSULTEE	ACTIVITY	NUMBERS ATTENDED OR CONSULTED WHERE APPLICABLE	KEY ISSUES RAISED	HOW ISSUES WERE CONSIDERED BY NPG
16/7/2016	Brixton Parish Community	<ul style="list-style-type: none"> Community Workshop to further engage parishioners, including children, with community survey. Two Guided walks around the parish lead by local historian showing historic places of interest . 	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 style="list-style-type: none"> Importance of natural environment including AONB. Greenfield sites should not be developed. Interest in renewable energy projects Maintenance of existing footpaths Desire for a swimming pool Safer cycle routes Desire for more rural and aquaculture employment Improved public transport Importance of local shops Housing development must be small scale, sensitively designed and within the existing development boundary. People leaving parish due to housing reasons. 	

DATE	CONSULTEE	ACTIVITY	NUMBERS ATTENDED OR CONSULTED WHERE APPLICABLE	KEY ISSUES RAISED	HOW ISSUES WERE CONSIDERED BY NPG
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 style="list-style-type: none"> • Railway cutting between Otter and Elburton • Meadow by A379 • Horsham playing fields • Staddiscombe playing fields • Tunnel and Brixton Tor • Bridge at Coflette Creek 	

DATE	CONSULTEE	ACTIVITY	NUMBERS ATTENDED OR CONSULTED WHERE APPLICABLE	KEY ISSUES RAISED	HOW ISSUES WERE CONSIDERED BY NPG
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 style="list-style-type: none"> BPC informed of Local Green Spaces Consultation process . NP Budget update 	BPC + 10 members of the public	LGS Consultation 28/12/16-8/1/17	
25/1/2017	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			

DATE	CONSULTEE	ACTIVITY	NUMBERS ATTENDED OR CONSULTED WHERE APPLICABLE	KEY ISSUES RAISED	HOW ISSUES WERE CONSIDERED BY NPG
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 consultation feedback below. Responses can also be viewed at: http://www.brixtonparishcouncil.org.uk/Neighbourhood_Plan_2016_4508.aspx	



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Brixton Parish Neighbourhood Plan 2014-2034

Policy	Consultee	Comment	BNPP 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 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 Pars 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>

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 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:</p> <p>https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section:</p> <p>https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance:</p> <p>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

Brixton Parish Neighbourhood Plan 2014-2034

Policy	Consultee	Comment	BNPN Group Response
CofI	Debbie Parnowski	<p>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.</p> <p>Please could you correct this by adding us and if you can't please explain why.</p>	<p>Noted.</p> <p>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 CofI.</p>
	Carol Webb	<p>I have read the policies and objectives and cannot find anything to disagree with.</p> <p>Keep up the good work.</p>	Constructive comment
	Martyn Oates	<p>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.</p> <p>Green Space</p> <p>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.</p> <p>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.</p> <p>Public Rights of Way</p>	<p>Noted.</p> <p>Preface amended to include development pressures on existing infrastructure.</p> <p>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.</p> <p>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'.</p> <p>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.</p> <p>The comment on correspondence relates to bonafide communication on behalf of the BNPN group concerning land ownership enquiries as was explained when this issue arose in 2016.</p>
		<p>The plan states that it wishes to improve and provide new public rights of way.</p>	Agreed
		<p>Please can you add to the plan a clear map of all existing public rights of way including;</p> <p>Footpaths, Bridleways, unclassified county roads (green lanes) and in addition any permissive paths such as Silverstream Way.</p>	This already defined on the DCC Public Rights of Way website. www.new.devon.gov.uk/prow/
		<p>Recent events do not indicate total active support from Brixton Parish Council for the policy of protecting public rights of way namely,</p>	Not relevant to this Plan
		<p>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.</p>	Not relevant to this Plan, it is a County matter.
		<p>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.</p>	<p>This is a Parish Council matter and is being addressed.</p> <p>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.</p>
		<p>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?</p>	Sherford is not included within the Designated Area Terms of Reference within the BNPN as this is being dealt with within the Sherford development Plan. This includes a comprehensive proposal for public access.

REGULATION 14 CONSULTATION

Policy	Consultee	Comment	BNPP 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 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.	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 illustrating improved or new access to Sherford and Plymouth
		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.	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
		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.	We suggest this proposal could be addressed as part of Parish Project Action Plan 1.
		Employment Areas	

APPENDIX 3

Policy	Consultee	Comment	BNPP 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 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.	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 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.	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 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.	The reference to Brixton Campsite as a community facility will be removed. Noted Noted
		Renewable Energy	

REGULATION 14 CONSULTATION

Policy	Consultee	Comment	BNPP Group Response
		<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 bidigestors 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. <i>(confirmed circulated to NPG)</i></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	<p>We represent the prospective long-term lessees and developers of Steer Point quarry and brickworks.</p> <p>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.</p> <p>We would like to suggest as follows:</p> <p>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> <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.</p> <p>We will be happy to elaborate upon these representations should you find this helpful.</p> <p>Kindly acknowledge receipt of this email <i>(done)</i> Roger Hephher, Director</p>	<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> <p>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.</p>
	Hazel Hawken	<p>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.</p> <p>thanks for the hard work that I know had gone into this, keeping the village feel in mind.</p> <p>Yours sincerely, Mrs Hazel Hawken</p>	Constructive comment

APPENDIX 3

Policy	Consultee	Comment	BNPP Group Response
	Alistair Macpherson	<p>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.</p> <p>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.</p> <p>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></p> <p>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 'initiatives that support transition to a low carbon future'</p> <p>Policies - All the policies have my support with the exception of DEV5 as the proposed provision for car park seems excessive.</p>	<p>Constructive comment</p> <p>Noted</p> <p>Noted</p> <p>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.</p>
		<p>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.</p>	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.
		<p>Cof4 - this should be worded 'provide for or provide s106 contribution towards' to be consistent with other policies and avoid provision of small useless play space</p>	We assume this is a reference to Cof3. This policy has been amended.
		<p>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?</p>	This policy has been reviewed and removed from this section. The importance of this site is now referred to in a new policy: Dev10.
		<p>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.</p>	Noted
		<p>I trust that is helpful</p> <p>Please pass on my congratulations to Ray & Jon. Best wishes, Alistair Macpherson</p>	
	Shona McDonough Clerk to Newton & Noss Parish Council	<p>Newton & Noss Parish Council met yesterday evening and considered the matter.</p> <p>The members were in agreement, commending Brixton Parish Council for the work undertaken in preparing their Neighbourhood Plan and to wish every success.</p>	Constructive comment
	Natural England	<p>Planning consultation: Brixton Neighbourhood Plan – Regulation 14 version</p> <p>Thank you for your consultation on the above dated 01 December 2017.</p> <p>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.</p>	Noted
		<p>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.</p> <p>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:</p>	



REGULATION 14 CONSULTATION

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.
		Please let me know if you have any questions or require further clarification.	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.
	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.

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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.



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Policy	Consultee	Comment	BPNP 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, 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: <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 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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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

Please be aware that telephone calls to and from the Council may be recorded for training and monitoring purposes.

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

Policy Ref	BNPP Policy	SHDC Comment	BNPP 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.	Acknowledged
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 in conformity with the strategic policies of the Local Development Plan that is extant at the time of the examination of the NP. For South Hams, this is currently the 2006 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 Plymouth and South West Devon Joint Local Plan (JLP) 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 Brixton NP. If this is the case, all references to the Core Strategy should be removed from the NP and from the Basic Conditions Statement. A list of strategic Development Plan policies is included as an appendix to this letter.	We acknowledge this comment, but at the time of submission the JLP has not been adopted and therefore the 2006 Core Strategy remains the current South Hams District Council local planning policy. The Neighbourhood Plan is a living document and therefore will be reviewed periodically and amended accordingly.
3)		Overall development strategy: It is recognised that the parish of Brixton has seen major recent and ongoing development, and also that there are 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.	We recognise the relevance of development opportunities. Since Regulation 14, the BNPP Plan has been updated to include land owned and put forward by SHDC for the provision of community housing. It is anticipated that it might deliver the required number of dwellings for Brixton as a 'sustainable village'.
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	Canes Orchard phased development will deliver the numbers of affordable homes identified in the Housing Needs Survey 2016. See also comment 3) above re community housing.
5)		For the above reasons, the LPA is concerned that the NP as currently drafted does not adequately demonstrate 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 dwellings that would meet local and affordable housing need. This may be appropriately delivered through a Community Land Trust or other community-led 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 criteria in the NPPF 77. The Housing Needs Survey is readily available on the Brixton Parish Council website: brixtonparishcouncil.org.uk/NeighbourhoodPlan
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 NeighbourhoodPlan@swdevon.gov.uk . The target for completing screening reports is 10 weeks, including consultation with statutory consultees. Should SEA be considered necessary, this can be undertaken at no cost to the NP group via the DCLG support package available at https://mycommunity.org.uk/take-action/neighbourhood-planning/support-grants/	A draft Screening Opinion was provided by SHDC following their consultation with Historic England, Natural England and the Environment Agency (March 14th 2017). The Screening Opinion identified either A) no negative effect or B) no significant effect. There were no C) likely significant effect alone. It identified that an HRA is not required. Where comments on Policies were made, these have been taken into account and the relevant Policies amended.

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Policy Ref	BPNP Policy	SHDC Comment	BPNP Group Response
9j)		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 confusion where NP policies differ in interpretation from JLP policy, and is unnecessary unless JLP policy does not adequately address local circumstances. In such cases, it will be appropriate for the NP policy to add emphasis or detail. Where this is the case it should be made clear in supporting text. Individual instances of where this occurs are picked up in the detailed comments below.	Local detail relevant to the Parish has been added to the BPNP Policies.
	Comments on specific parts of the Neighbourhood Plan		
	<i>Where a particular policy is not commented on, please assume that the LPA supports it</i>		
	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 the AONB would be useful in this section.	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.	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 bio-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 safeguarded 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 settings.	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 surroundings.	Is any type of renewable energy generation of any size acceptable? Some clarification is needed.	Any size of renewable energy generation will need to be assessed against national and local development policies.
Cof1	Cof1. The following local facilities are designated as Assets of Community Value: The Post Office / village shop The Foxhound pub The Scout hut St 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.	Community Assets re-assessed and revised.
Cof2	Cof2. New development will be required to contribute towards the provision or improvement of community facilities in Brixton in accordance with adopted standards and local priorities which could include but is not restricted to: • a parish hall, • off-street car parking and/or car park, • a visitor car park in Brixton 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/part11	SHDC does not have a CIL regulations policy. Section 106 contributions will be required under statutory planning obligations but must also consider: Brixton Parish Sport and Recreation Plan and Brixton Parish Community Facilities Plan
Cof3	Cof3. 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/jointlocalplan/evidencebase and Fields in Trust guidelines http://www.fieldsintrust.org/	Policy wording amended.

APPENDIX 3

Policy Ref	BPNP Policy	SHDC Comment	BPNP Group Response
Sar1	Sar1. Public open space, private outdoor sports grounds, school playing fields and allotments shall be protected and retained in that use. Only development directly associated with and necessary for their improvement will be permitted unless: (a), an alternative and improved provision is provided that retains its original functional requirements for existing and future users; and (b), the proposal would not result in the loss of an area important for its amenity or contribution to the character of the area in general.	What does this policy add to JLP DEV3? As currently worded, the grammar of part b) of the policy is confusing: 'Only development... will be permitted unless (b) the proposal would not result in the loss of...' It is not entirely clear what is intended here.	This policy adds further local detail.
Dev Map 1		This is a useful map to help set the context for the NP	Noted
Tp12	Policy Tp12	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 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 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.	New Map produced. See general comment 8 above.
Dev1	Policy Dev1 Development shall not harm but maintain and enhance the South Devon AONB and its setting, paying full regard to national and local strategic policies for the AONB and to the South Devon AONB Planning Guidance.	This policy repeats the requirements of Policy Env1 and as such is not considered necessary.	Policy wording amended
Dev2	Policy Dev2 Location, scale and character of development. (a) Within the settlement boundary the scale, density and character of development shall be in keeping with its site and surroundings and shall cause no adverse impacts on natural or historic assets, important views, outlooks or skylines, local amenity, traffic, parking or safety	The provisions of this part of the policy are already well provided for in existing planning policy. As such, this part of the policy is not considered necessary.	Noted
Dev2	Policy Dev2 (b) Elsewhere in the parish development will be strictly controlled and only permitted where it is small scale (1 - 2 dwellings) and can be delivered sustainably and not in conflict with any other policy.	This part of the policy is contrary to JLP TTV31, which supports housing and employment development for local needs only adjacent or very close to existing settlements. Isolated development elsewhere is only supported in very specific circumstances, such as to meet the needs of a rural worker. As currently worded, the NP policy is more permissive than JLP TTV31. Unless this is the intention, we suggest removing this part of the policy.	This section of the policy removed
Dev2	Policy Dev2 (c) In the event that a future Housing Needs Survey identifies the need for essential, affordable local housing for Brixton community, small numbers of sensitively located, well designed housing, might be considered within the Parish outside the AONB.	As above. This is already provided for by JLP TTV31 where the proposed development is adjacent or very close to existing settlements. As currently worded, the NP policy is more permissive than JLP TTV31. Unless this is the intention, we suggest removing this part of the policy.	Policy wording amended
Dev2	Policy Dev2 (d) Small scale development that secures a viable long- term future 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 permitted	As above. In addition the wording 'essential local need' potentially creates confusion. What is intended here? This could be interpreted as need for several affordable houses, or in several other ways. Again we suggest removing this part of the policy which is already covered by TTV31.	Reference to local need removed.
Dev3	Dev3. All new development should be of high quality and appropriately designed for the context in which it is proposed with respect to its neighbours and the rural character of Brixton village and Parish. Development shall take into account topography, layout, building orientation, massing, landscaping, public green space and 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."	What does this policy add to JLP DEV10 and Dev20? NPs should avoid repeating existing/emerging policy wherever possible.	Policy retained to emphasise the requirement for good design which has been lacking in recent developments.
Dev4	Dev4. Design shall maximise, where possible, the orientation of new development to capitalise on solar energy and other natural sustainable resources to reduce energy consumption. Development 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.	As above – does this policy add significantly to JLP DEV34?	Policy retained and updated to emphasise the requirement for good design which has been lacking in recent developments.
Dev5	Dev5. All new developments shall include adequate off street parking and cycle storage for residents, users and visitors. Residential developments shall also provide at least one parking space per bedroom.	This policy is supported, although some clarification of 'adequate' is recommended. See NPPF 39, updated in 2015 with the following text: "Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network." (written statement: Planning Update March 2015)	Representations to the Parish Council have drawn attention to the inadequacy of parking provision in new developments. This inadequacy has resulted in significant safety concerns (parking on the pavement and insufficient space for deliveries), social tension through lack of parking spaces, and negative visual impact for the residents of, and visitors to, these new housing schemes.
Dev6	Dev6. Existing Recreation and Tourism facilities shall be retained for that use. Only development directly associated with and necessary for their improvement will be permitted unless: (a) alternative and improved provision will be made in a location well related to the functional requirements of the use and its existing and future users; and (b) the proposal would not result in the loss of an area important for its contribution to the character of the area in	This policy is supported, but suggest adding wording to the effect 'Unless it can be demonstrated to be no longer financially viable'. There appears to be text missing at the end of part (b)?	Policy wording amended
Dev6	Dev6. Future development of former Steer Point Brickworks hard 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 AONB. Only development proposals to enhance this site and provide significant overall community benefit in this special location will be considered.	More detail would be welcomed here as to what might be considered acceptable development for this site and what sort of community benefits are aspired to and might be realised from the site.	Policy wording amended. What will be acceptable in relation to any forthcoming planning application will be judged on its individual merits and assessment of significant community benefit.



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	Y	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	Y	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	Y	Sets out broad design parameters. NPs may add local detail. DPD1 is relevant.
CS8, Infrastructure provision	Y	NPs may add local detail.
CS9, Landscape and historic environment	Y	In broad conformity with NPPF. NPs may add local detail. DPD2 and DPD5 are relevant.
CS10, Nature conservation	Y	DPD5 is relevant.
CS11, Climate change	Y	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	Y	
DPD8, Open space, sport and recreation	Y	
DP11, Housing mix and tenure	Y	
Site Allocations DPD policies where appropriate		

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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

APPENDIX 3

		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 https://www.plymouth.gov.uk/jointlocalplanevidencebase
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/StrategicHousingMarketNeedsAssessmentPart2.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 https://www.plymouth.gov.uk/sites/default/files/StrategicHousingMarketNeedsAssessmentPart2.pdf
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 https://www.plymouth.gov.uk/jointlocalplanevidencebase
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 https://www.plymouth.gov.uk/jointlocalplanevidencebase



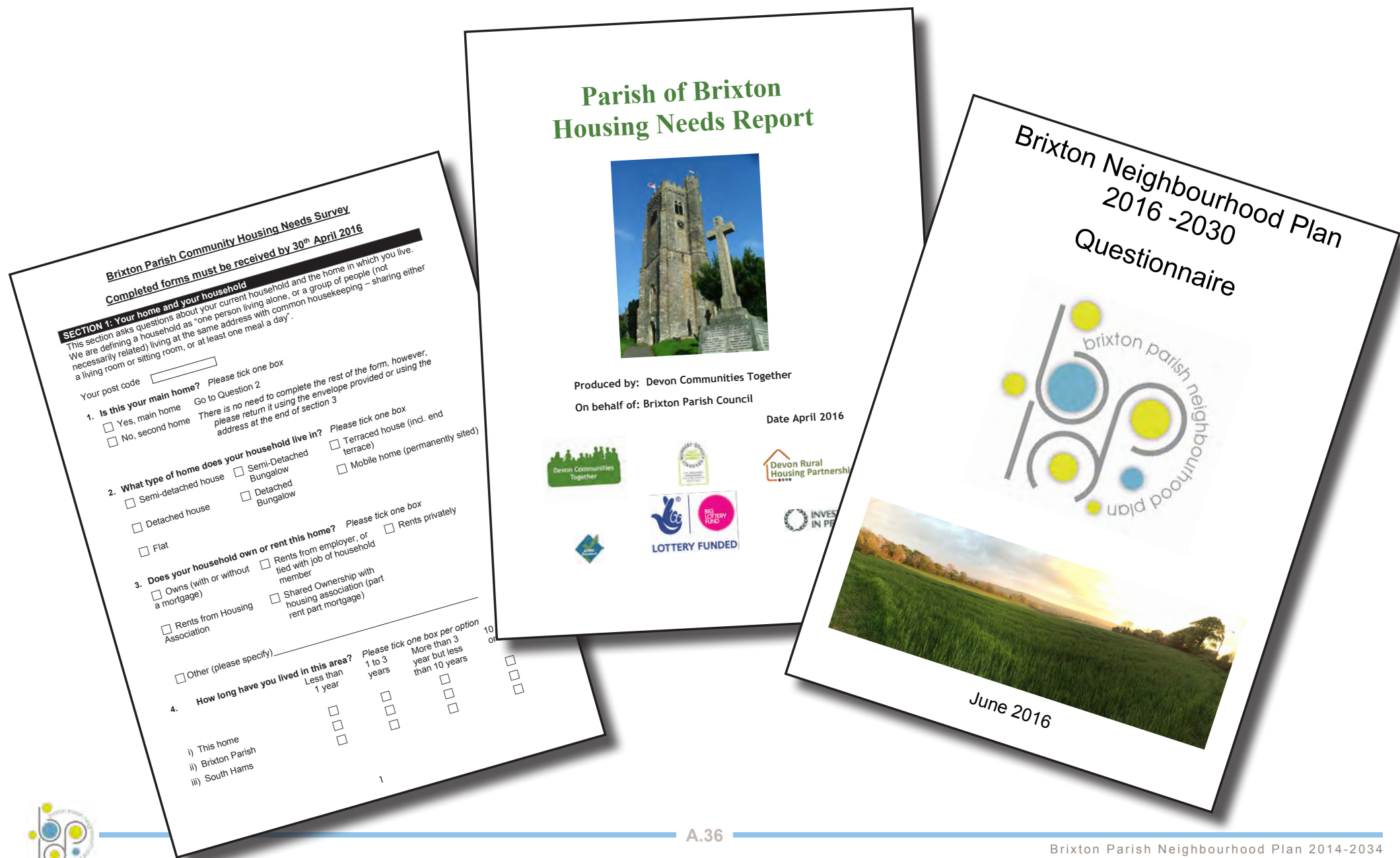
REGULATION 14 CONSULTATION

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Strategic Policy 13 Community Services and Facilities	Yes	In broad conformity with NPPF. Up-to-date evidence available at https://www.plymouth.gov.uk/jointlocalplanevidencebase
Strategic Policy 14 Accessibility Planning	Yes	In broad conformity with NPPF. Up-to-date evidence available at https://www.plymouth.gov.uk/jointlocalplanevidencebase
Strategic Policy 15 Traffic Management	Yes	In broad conformity with NPPF. Up-to-date evidence available at https://www.plymouth.gov.uk/jointlocalplanevidencebase
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 https://www.plymouth.gov.uk/jointlocalplanevidencebase
Strategic Policy 18 The Heritage and Historical Character of West Devon	Yes	In broad conformity with NPPF. Up-to-date evidence available at https://www.plymouth.gov.uk/jointlocalplanevidencebase
Strategic Policy 19 Biodiversity	Yes	In broad conformity with NPPF. Up-to-date evidence available at https://www.plymouth.gov.uk/jointlocalplanevidencebase
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 https://www.plymouth.gov.uk/jointlocalplanevidencebase
Strategic Policy 21 Flooding	Yes	NPPF paras 102-104 are relevant
Strategic Policy 22 Okehampton	No	Up-to-date evidence is available at https://www.plymouth.gov.uk/jointlocalplanevidencebase
Strategic Policy 23 Tavistock	No	Up-to-date evidence is available at https://www.plymouth.gov.uk/jointlocalplanevidencebase
Strategic Policy 24 Sustainable Rural Communities	No	Up-to-date evidence is available at https://www.plymouth.gov.uk/jointlocalplanevidencebase

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

http://www.brixtonparishcouncil.org.uk/Neighbourhood_Plan





Document	Authors	Date	Source
COMMUNITY-BASED EVIDENCE			
A Parish Plan for Brixton 2012	Brixton Parish Council	2012	http://www.brixtonparishcouncil.org.uk/ UserFiles/Files/Parish%20Plan/PP%20Parish%20Plan%20v2012%20r.pdf
Brixton Housing Needs Survey Report	Devon Communities Together (DCT)	April 2016	http://www.brixtonparishcouncil.org.uk/ UserFiles/Files/Neighbourhood%20Plan/Brixton%20Housing%20Needs%20Report%20FINAL.pdf
Comments on Affordable Housing	Various community members	April 2016	http://www.brixtonparishcouncil.org.uk/ UserFiles/Files/Neighbourhood%20Plan/Q9.pdf
Neighbourhood Plan Questionnaire	BPNP Team	June 2016	http://www.brixtonparishcouncil.org.uk/ UserFiles/Files/Neighbourhood%20Plan/Brixton%20Neighbourhood%20Plan%202016-2030%20Questionnaire.pdf
Brixton NP Questionnaire Report	Catalyst/DCT	July 2016	http://www.brixtonparishcouncil.org.uk/ UserFiles/Files/Neighbourhood%20Plan/Brixton%20Neighbourhood%20Plan%20Community%20Survey%20Report%20June%202016.pdf
Community Day Report 2016	Catalyst/DCT	Sept 2016	http://www.brixtonparishcouncil.org.uk/ UserFiles/Files/Neighbourhood%20Plan/Community%20Day%20Report%20July%202016.pdf
Community Day Report 2017	Catalyst/DCT	May 2017	http://www.brixtonparishcouncil.org.uk/ UserFiles/Files/Neighbourhood%20Plan/170506-community_day_report-final.pdf
DISTRICT-BASED EVIDENCE			
Plymouth & SW Devon Joint Local Plan 2014-2034 and Evidence Base	Plymouth CC, West Devon and South Hams DCs	Aug 2017	https://plymswdevonplan.co.uk/policy https://www.plymouth.gov.uk/jointlocalplanevidencebase
South Hams previous local dev framework	Core Strategy	2006	https://www.southhams.gov.uk/article/3868/Local-Development-Framework
Sherford Plans	Bovis/Linden/Taylor Wimpey	Ongoing	http://sherford.org/
S Devon AONB	S Devon AONB	2017	http://www.southdevonaonb.org.uk/uploads/files/mp2014/AONB_Management_Plan_2014_2019.pdf
	AONB Planning Guidance	2017	http://www.southdevonaonb.org.uk/uploads/files/AONB_Planning_Guidance_version_1.pdf



COUNTY-BASED EVIDENCE			
Joint Strategic Needs Assessment	Devon County Council	2015	http://www.devonhealthandwellbeing.org.uk/wp-content/uploads/2015/06/JSNA_Devon_Overview_2015.pdf
Environment and Landscape Data	Devon County Council	Ongoing	https://new.devon.gov.uk/environment/environmental-maps
NATIONAL-LEVEL EVIDENCE			
Population and Census data	ONS	2011 & earlier	https://www.ons.gov.uk/census/2011census/2011censusdata
Priority Habitats	DEFRA MAGiC maps DEFRA		www.magic.defra.gov.uk http://jncc.defra.gov.uk/page-5706

The following list of projects has been developed from community consultation during the development of the Neighbourhood Plan. These actions do not form part of the Neighbourhood Plan but form a plan of action for implementation over the next few years:

1.0 SPORT AND RECREATION:

To prepare and publish a Sport and Recreation Plan to include but not restricted to the following:

- To secure land at Cofflete Mill (currently owned by SHDC) as a community amenity area.
- To make arrangements for public use of St Mary's School swimming pool.
- To improve existing and create new Footpaths and Cycle/Bridle ways, for example:
- To provide access from footpath no.9 via Monkey Lane* to provide public safe access for pedestrians, cycles and horse riders to the existing and proposed footpath/cycle/bridleway network at Sherford Country Park.

**(Note: Traffic Order required from DCC to restrict vehicular use of Monkey Lane to access only).*

- To extend the range of footpath access along Cofflete Creek to Wembury Woods and to include public footpath access from the Creek to the existing PRow from the lane at the end at Spriddlestone
- To extend the existing public footpath and cycle access from Yealmpton along the dismantled railway line to cylinder bridge to link with the existing public footpath.

(Note: Rights of way are an important recreational facility, which local authorities must protect and enhance. Local authorities should seek opportunities to provide better facilities for walkers, cyclists and horse-riders, for example by adding links to existing rights of way networks.)

- To extend the existing public footpath access from Fordbrook to Halwell and link to Horsham Fields.
- To provide safe designated pedestrian footpath access along Steer Point Road.
- To extend the public footpath/cycle way from Elburton to Yealmpton along the dismantled railway line.

(Note: Rights of way are an important recreational facility, which local authorities must protect and enhance. Local authorities should seek opportunities to provide better facilities for walkers, cyclists and horse-riders, for example by adding links to existing rights of way networks.)

- To provide a new pedestrian footpath adjacent the A379 from the end of the existing public footpath by Hilltop Lane to Chittleburn (Rodgers Garage).
- To support the upgrade of the footpath/cycle path from Otter Nurseries to Elburton to join with the Sherford to Laira Bridge cycle route (and to provide access for recreational cycling to Saltram, the Plym Valley Trail etc.)
- To create 'circular' footpath access where possible to link up existing and new footpaths to provide safe and varied routes.



2.0 COMMUNITY FACILITIES:

To prepare and publish a Community Facilities Plan to include but not restricted to the following:

- To negotiate greater use of St Mary's church for community and public events.
- To encourage the community to support the village shop and Post Office and other local businesses in the Parish.

3.0 PARISH HERITAGE:

To prepare and publish a Parish Heritage Plan to include but not restricted to the following:

- To create an historic appraisal of Brixton village to define and designate a Conservation Area focused on the historical centre of Brixton village to conserve the importance and heritage of this long established settlement.
- To prepare an inventory for non-designated historic buildings and structures.
- To identify historic features falling into disrepair within the parish for maintenance, repair and conservation work eg. Estate stone walling.

4.0 PARISH ENVIRONMENT:

To support the provision of recycling facilities within the parish, expanding the existing Community Composting Scheme facility at Catson Green.

To identify opportunities for greening the route of the A379 along selected built up areas in Brixton village, by planting of trees and protection of roadside open spaces and verges, including sowing wild flowers.



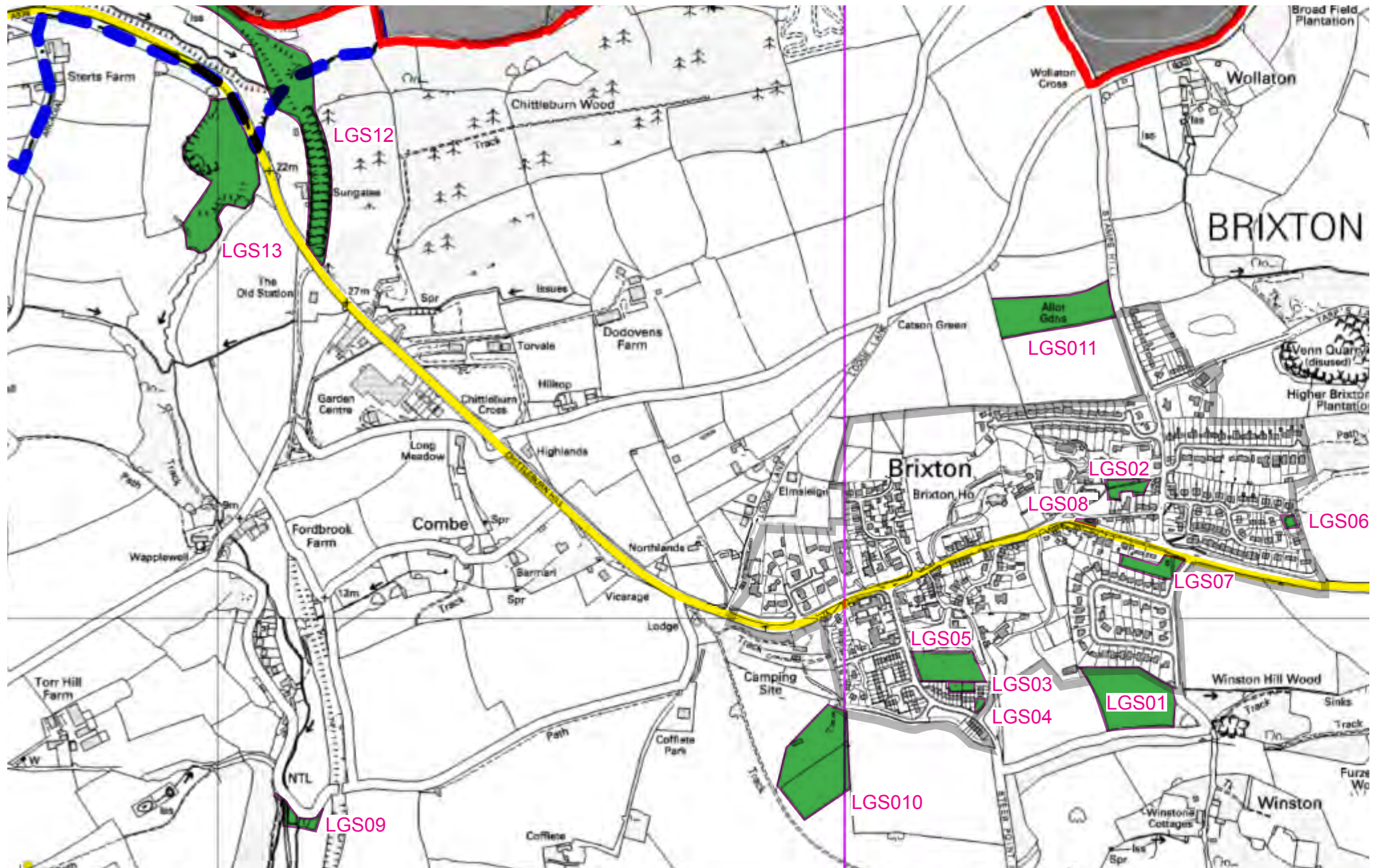
Village Green historic phone box



Typical meadow flower planting to a verge in the South Hams



THEME	INDICATORS	HOW MEASURED
Environment	Enhanced Biodiversity New Green spaces agreed Opportunities for Community Renewable Energy identified	Records of species Parish Council records WPD information on agreed connections. Energy generated.
Community Facilities	New community facilities proposed Funding for facilities obtained from any new developments, New parking places provided	Parish Council records Number of Parking Spaces
Sport and Recreation	New outdoor facilities for outdoor sport and recreation identified and provided. New cycle paths and footpaths provided	Sport and Recreation strategy agreed with S Hams Funds obtained Number of new or improved paths
Transport	Safe, sustainable transport linkages to neighbouring parishes and Plymouth, particularly cycle paths, footpaths provided.	Number of linkages Usage figures.
Employment	New employment premises New local jobs	Local planning and employment records
Development	Developers discuss development proposals with PC at pre-planning stage Neighbourhood Plan policies upheld.	Parish Council meeting minutes, Planning decisions



“Policy 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 LGS Map 1)”.

The public consultation process for identified Local Green Spaces is contained within the Statement of Consultation in Appendix 3 and the evidence to support Local Green Space allocation can be found within the Evidence Base in Appendix 4.

There are thirteen Local Green Spaces numbered LGS01-LGS13 which can be found in the proceeding pages with a photograph and a map of each location for identification.

Local Green Space Designations:

LGS01:	Land to the south of The Crescent
LGS02:	Feoffee Park
LGS03:	Brixstix Play Space
LGS04:	Land at Elliotts Hill and Steer Point Road
LGS05:	St Mary’s School Playing Field
LGS06:	Woodland Drive Play Space
LGS07:	Land known locally as “The Donkey Field”
LGS08:	Village Green
LGS09:	Cofflete Creek Head
LGS10:	Playing field between Cofflete Park and CampSite
LGS11:	Allotments adjacent Stamps Hill
LGS12:	Former Railway Cutting at Chittleburn
LGS13:	Mature Orchard to west of A379 at Chittleburn

Information on each designation is detailed on the following pages.

Policy Context

The National Planning Policy Framework (NPPF) gives communities the opportunity to protect green areas through the new Local Green Space (LGS) designation. LGS confers a similar level of protection as Green Belt land.

Included in this section are the important woodlands identified in the Parish that contribute to the landscape character of the Parish and South Devon AONB. See MAP Env5.

Strategic Context National Planning Policy Framework (NPPF)

Para 76: Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space, local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.

Para 77: The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

CRITERIA 1: where the green space is in reasonably close proximity to the community it serves;

CRITERIA 2: where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

CRITERIA 3: where the green area concerned is local in character and is not an extensive tract of land.

Para 78: Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts.

Planning Practice Guidance

3.5. Further information on Local Green Space can be found within national guidance:

<https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-wayand-local-green-space>



LGS01: Land to the South of The Crescent, Brixton**Criteria 1:**

This land is a privately owned, greenfield site and is set entirely in the South Devon AONB. One side of this field borders the gardens of the houses on the lower level of The Crescent which is an estate at the eastern end of the village. It can be seen from most of the houses on the south side of the village as they are set on a hill leading down to this field and it can be seen over the roof tops. It marks the edge of village development boundary. It contributes to the green setting of the village and can be seen from the A379, from the village church and from the top of Red Lion Hill.

Criteria 2

The land is surrounded by mature trees and hedges on 3 sides and by a small watercourse on the 4th. The land slopes steeply from the SE corner.

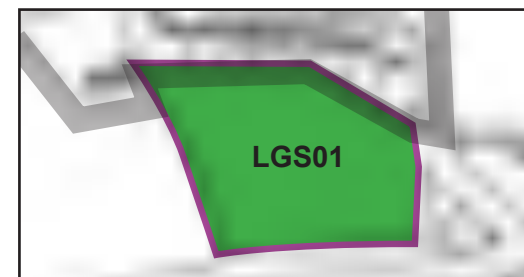
This land is regularly grazed by livestock and managed by a local farmer. It is demonstrably special to the community for its richness in wildlife including, but not restricted to: bats; foxes; owls; buzzards; sparrow hawks; a myriad of diurnal and nocturnal wild birds; insects and deer and for its utter tranquility which contributes to the wellbeing of the community by giving respite from the busy and noisy A379 that runs through the centre of the village and from hectic daily life.

The land has no street lighting and has very dark skies and is excellent for star gazing. Yorda Lane to the south is used regularly by walkers and the view over this field is enjoyed as a valued open space where bird and wildlife spotting is much enjoyed.

Although there is no public access to this field this does not diminish its value as people regularly walk around its boundaries and it can be viewed by many parishioners.

Criteria 3

This land provides an important natural transition between the village and open countryside and should be preserved for the setting it provides to the village. It is not an extensive tract of land. It is a small sized field directly adjacent to the residential area of the village. Its location, character and features make this field very valuable to the fabric of the village.

**LGS01**

LGS02: Feoffee Park**Criteria 1**

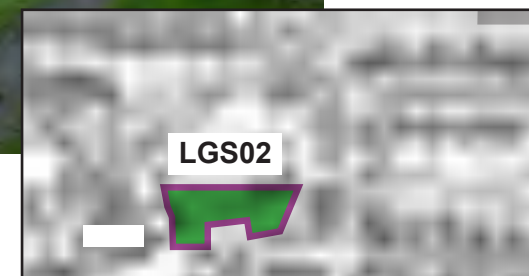
This land is privately owned and is held in trust for the benefit of Brixton Parish. It is situated behind the houses in Old Road on the North side of the A379 and is surrounded on 2 sides by the Churchyard which adds to its tranquility. It can be accessed through the Churchyard from the Village Green, by Red Lion Hill, and from Old Road.

Criteria 2

Formerly the school playground, it is a peaceful and tranquil area, shielded from the noise of the busy A379, for the use of the whole community. The Park is laid to grass and is characterised by a line of mature horse chestnut trees. The avenue of trees was originally planted as elms to produce firewood for the poor of the village over 100 years ago. Wild flowers attract pollinating insects adding to the biodiversity of the village. It is special to the local community as it is accessed from many parts of the village and by a Public Right of Way and links to St Mary's church yard. It is used by young and old alike and is one of the few places where the generations come together.

Criteria 3

It is a narrow strip of land of approximately 2/3 acre, running east to west, it is fairly flat and is a safe, enclosed area being part of the Brixton Play Trail.

**LGS02****LGS03: Brixstix Play Space****Criteria 1**

This land is owned and maintained by South Hams District Council. It is a fenced, gated, well equipped, play space immediately to the south of the Primary School playing field, and to the rear of the houses on Steer Point Road.

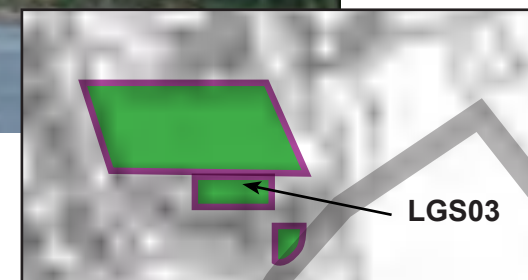
Criteria 2

This contained play space is well maintained, where children of all ages can play safely as part of the Brixton Play Trail. New equipment for the younger children has recently been installed.

It is used mostly by children who live to the South of the A379, as it can be accessed without crossing the A379.

Criteria 3

This is a small area laid to grass with some bark chippings. It has mature trees between it and the school playing field and is of great benefit to the local community.

**LGS03**

LOCAL GREEN SPACES

LGS04: Land at Elliotts Hill and Steer Point Road

Criteria 1

This privately owned verge (Housing Association) provides green space where Elliott's Hill joins Steer Point Road. The space is privately maintained. It is part of the Brixton Play Trail.

Criteria 2

This area is special to the local community as an active green space. It is laid to grass with young silver birch trees. It features a seat with 2 beautifully carved wooden owls, where people sit. A row of wooden stepping stones encourage children (and adults) to play.

Criteria 3

This modest corner provides informal play space, enhanced by the artistic carved seat and the planting of silver birch trees.

LGS05: St Mary's School Playing Field

Criteria 1

The school playing field at St Mary's Primary School is in the centre of the village and can be accessed by the schoolchildren and members of the public from 3 different entrances

Criteria 2

This space lies at the heart of village and provides a sports field/ open play space for school children. It is also used for Church and School events as well as a community recreational space out of school hours. Adjoining this green space is a dedicated area for recreation, fenced ball games court and play equipment.

The field is mostly flat and well maintained by the school. It is laid entirely to grass and is surrounded by hedgerows and trees on 2 sides including a small copse. The exercising of dogs is not allowed so it is a clean, safe play space.

Criteria 3

The playing field is an integral part of St Mary's School and as an accessible community space.

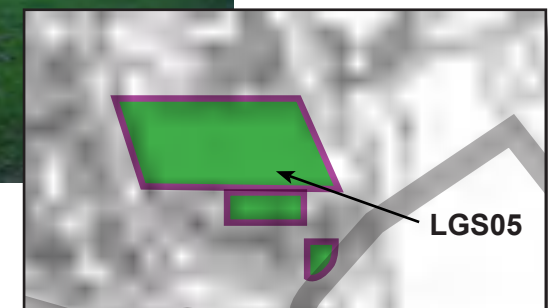
APPENDIX 7



LGS04



LGS05



LGS06: Woodland Drive Play Space

Criteria 1

This is a privately owned (Housing Association) and maintained, fenced, well equipped play space at the eastern end of the village. It adjoins open fields and the public footpath network, including the footpath link to Yealmpton.

Criteria 2

This space is important to the immediate community as this area was provided as an integral part of the design of the public realm.

The site topography makes it more suitable for older children, although small ones can play at the bottom end of the park. It is laid to grass with some bark chippings and has the benefit of hedgerows and mature trees on 1 side.

Criteria 3

It is a small, sloping area that encourages the children to be active, improving the well-being of the local children and their families.



LGS06



LGS07: Land known locally as “The Donkey Field”

Criteria 1

This is a privately owned and maintained, fenced area at the eastern end of the village running partly alongside the A379 and Winstone Lane and behind the houses fronting the A379. The field is adjacent to one of the local bus stops.

Criteria 2

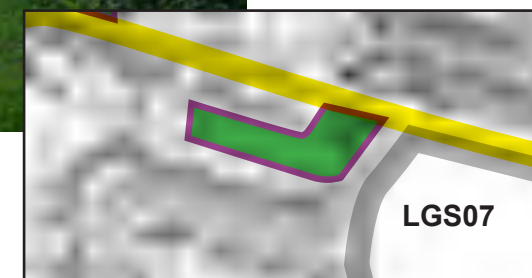
This green space provides a residual buffer between the A379 and The Crescent and contributes to the green setting of the village. This land has been associated with the grazing of donkeys for over 30 years. The community holds great affection for these donkeys as they are an integral part of the character on the approach to the village.

Criteria 3

This narrow strip of land is all that remains of the field that was developed to build The Crescent, over 40 years ago.



LGS07



LGS08: Village Green**Criteria 1**

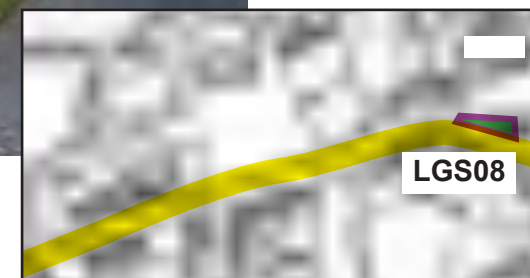
This small piece of land is a publicly owned and maintained, in the centre of the village, between the A379 and St Mary's Church. It is one of the few green spaces bordering the road providing a buffer between the main road and the entrance to the church.

Criteria 2

The Green is special to the community for its historic value, being the remains of the original, much larger village green. It laid to grass and is planted with seasonal flowers throughout the year. In December it is used to display the Christmas Tree. The Green is surrounded by historic icons, the church, Victorian lamp post, mounting block and red phone box. Despite its size it contributes significantly to the character of the village and the villagers are fiercely protective of it.

Criteria 3

The Green, although very small, is an important historic feature of the village and adds to the traditional character of the area comprising the church and Post Office.

**LGS08****LGS09: Cofflete Creek Head****Criteria 1**

This small parcel of land is adjacent to the ancient bridge at the head of Cofflete Creek, and land formerly the site of Cofflete Mill (demolished). It is accessed by a narrow road from Brixton Torr and from Mill Lane.

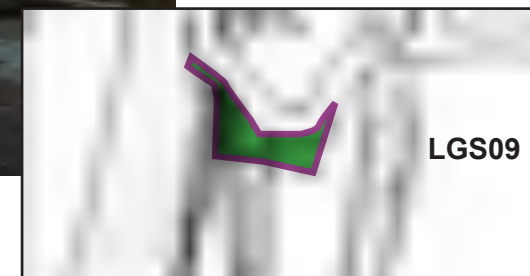
Criteria 2

This area is popular for its tranquillity, where the exceptional natural beauty of the head of Cofflete Creek can be appreciated and enjoyed. It is abundant with river bank wild life and many species of birds such as egrets, heron, and kingfishers.

This area also provides limited access to the creek and to the River Yealm for recreational water users.

Criteria 3

Located in the South Devon AONB, this space is highly valued for its beauty, abundant wildlife and connection to the water.

**LGS09**

LGS10: Playing Field between Cofflete Park and Camp Site**Criteria 1**

This playing field (football) is in private ownership leased for local league football games. It lies within the South Devon AONB and is accessed from the south west end of the village.

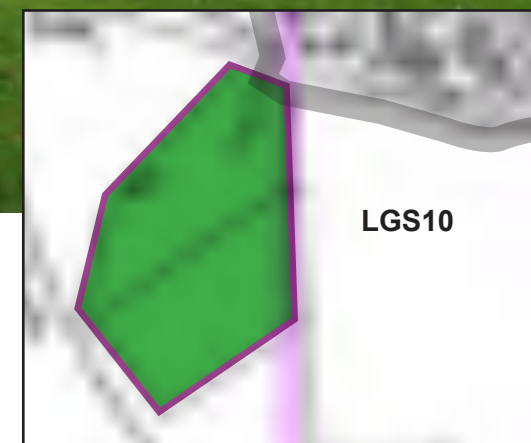
Criteria 2

This field is part of the wider context of Cofflete Park - historic parkland which includes the former driveway to Cofflete House. The drive was remodelled to include an avenue of Horse Chestnut trees to form a carriage drive to Grade 1 Listed Kitley House, Yealmpton. The playing field is an open and tranquil space set against the backdrop of the mature horse chestnut avenue. This green space lies within a Priority Habitat area (Woodpasture and Parkland) and is much appreciated by local people and footballers alike.

Criteria 3

The playing field is part of the unique character of the remaining historic parkland with beautiful views over the South Devon AONB.

There is detailed planning permission for the erection of a new scout hut on the edge of the playing field to complement the sports facility.

**LGS10**

LGS11: Allotments adjacent to Stamps Hill**Criteria 1**

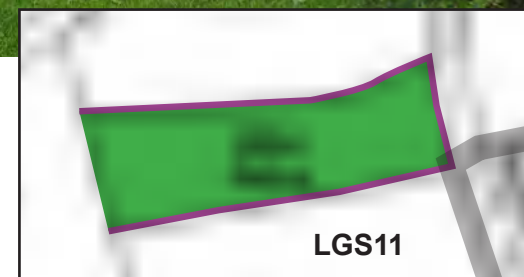
These well established, privately owned, allotments are located north of the village, adjacent to Stamps Hill. They have served the local community for well over 100 years and are maintained by the tenants who tend them. The land is surrounded by mature hedging bordering farmland.

Criteria 2

There are 29 allotments used by local residents to grow a variety of fruit and vegetables. The allotments are very popular, well maintained by the users and are in constant use being the only allotments in the Parish. They provide recreational value and well being for the community, as well as encouraging self sufficiency in home grown produce. They provide inter-generational benefit in the sharing of knowledge and sense of achievement.

Criteria 3

The limited size of the field restricts the number of plots available, unchanged for generations.

**LGS11**

LGS12: Former Railway Cutting at Chittleburn**Criteria 1**

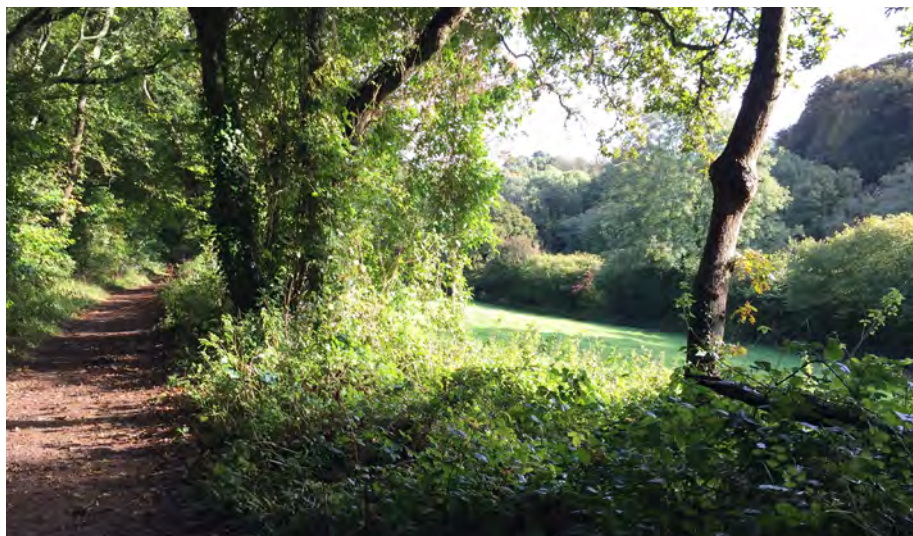
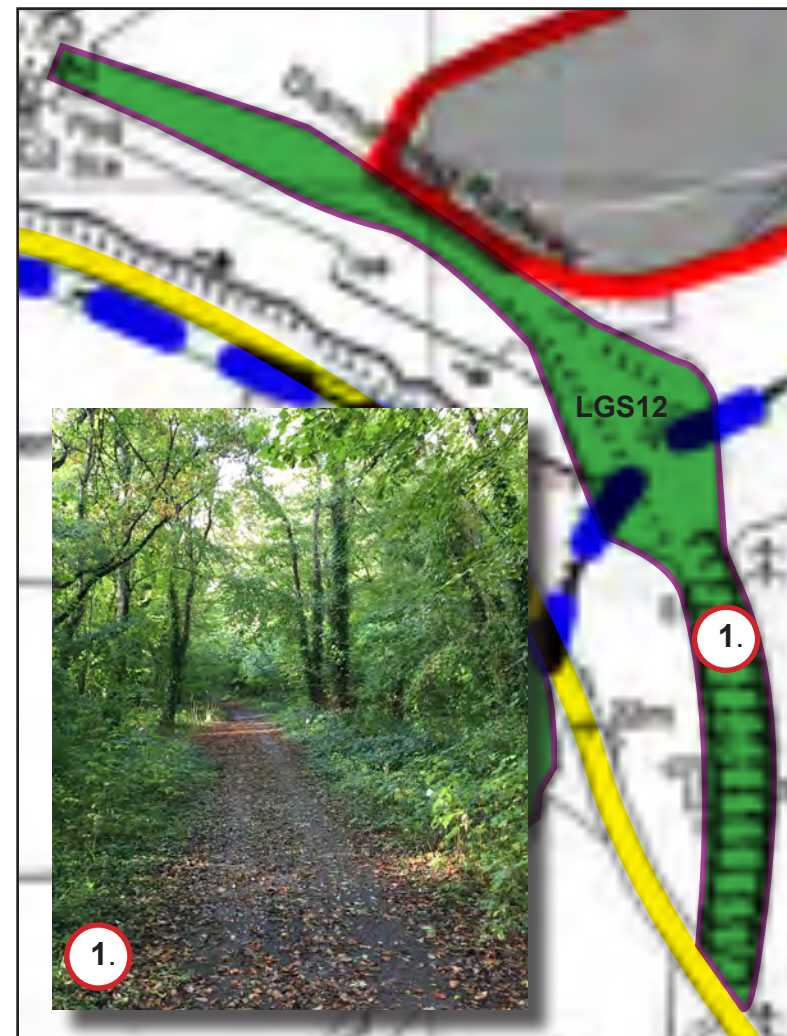
The retention and continued maintenance of the cycle way, originally provided by Sustrans and maintained by Plymouth City Council, will ensure this green corridor is retained as well as providing a recreational and sustainable transport link from Chittleburn to Elburton.

Criteria 2

Capitalising on the re-use of the historic railway cutting, this linear space is characterised by woodland trees either side of the cycle path providing a tranquil and attractive pedestrian and cycle link from Elburton to Otter Garden Centre. The cutting also provides an essential green corridor and rich wildlife habitat.

Criteria 3

The public use of this previous local railway link between Plymouth and Yealmpton retains this historical asset and the LGS designation safeguards the rural character of this tree lined route and adjacent landscape.

**LGS12**

LGS13: Mature Orchard to west of A379 at Chittleburn**Criteria 1**

The retention as a grazed orchard will emphasise the green corridor link between rural Chittleburn and urban Elburton. It is within the designated area of Plymouth urban fringe as strategic landscape.

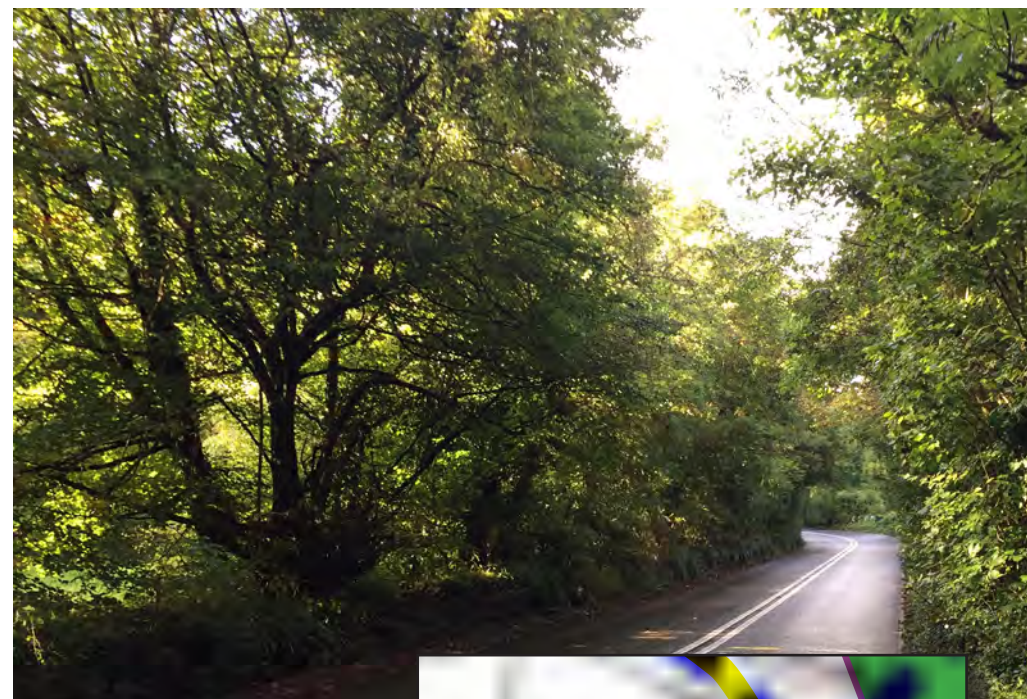
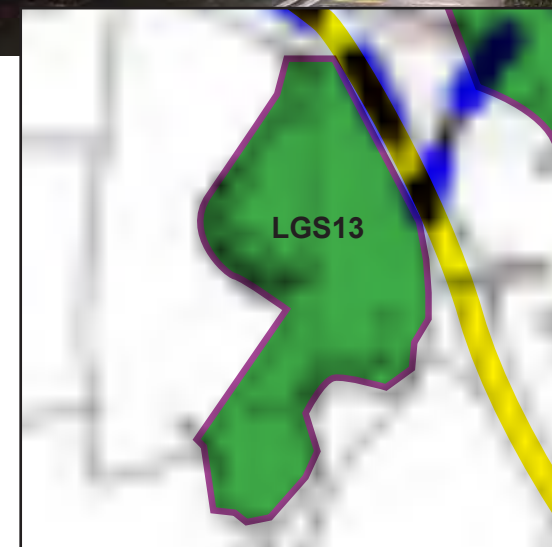
Criteria 2

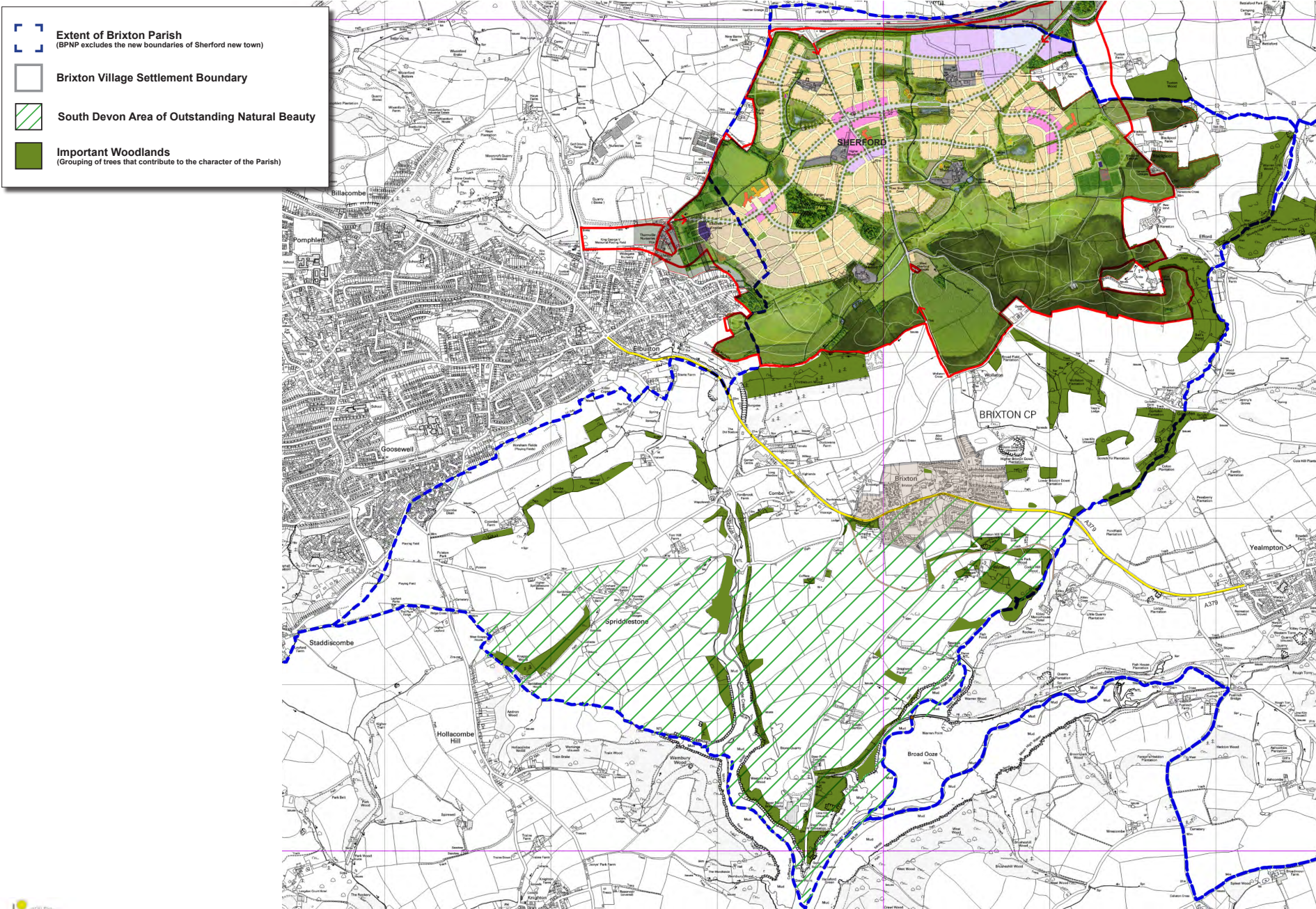
This area of green space is a mature, attractive orchard particularly appreciated in spring/early summer, and is enhanced by the grazing of sheep. It is a natural haven for wildlife.

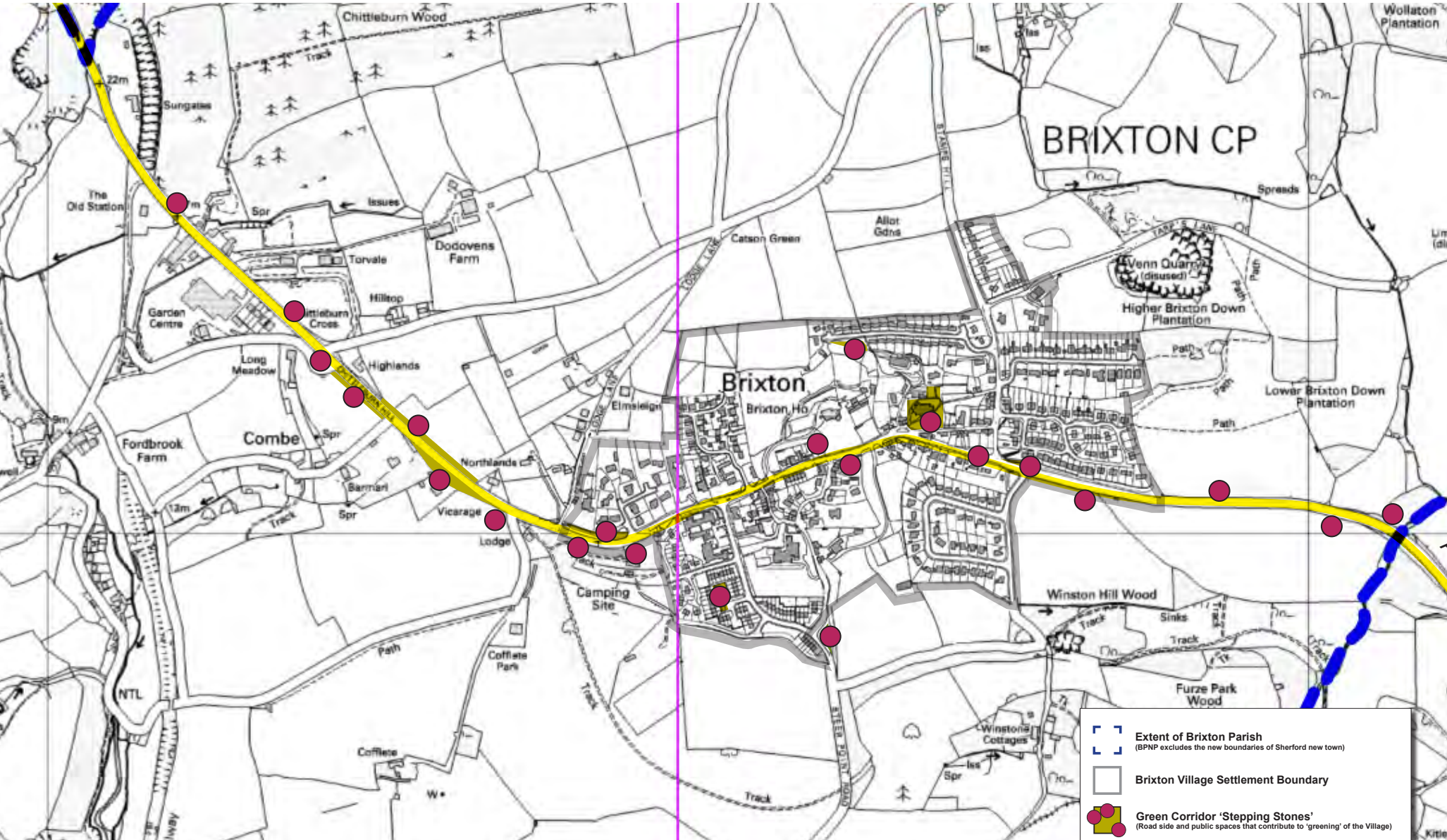
Its rural beauty is enhanced by the unexpected proximity of this unspoilt piece of green space immediately arriving in the Parish from to the built environment of Elburton.

Criteria 3

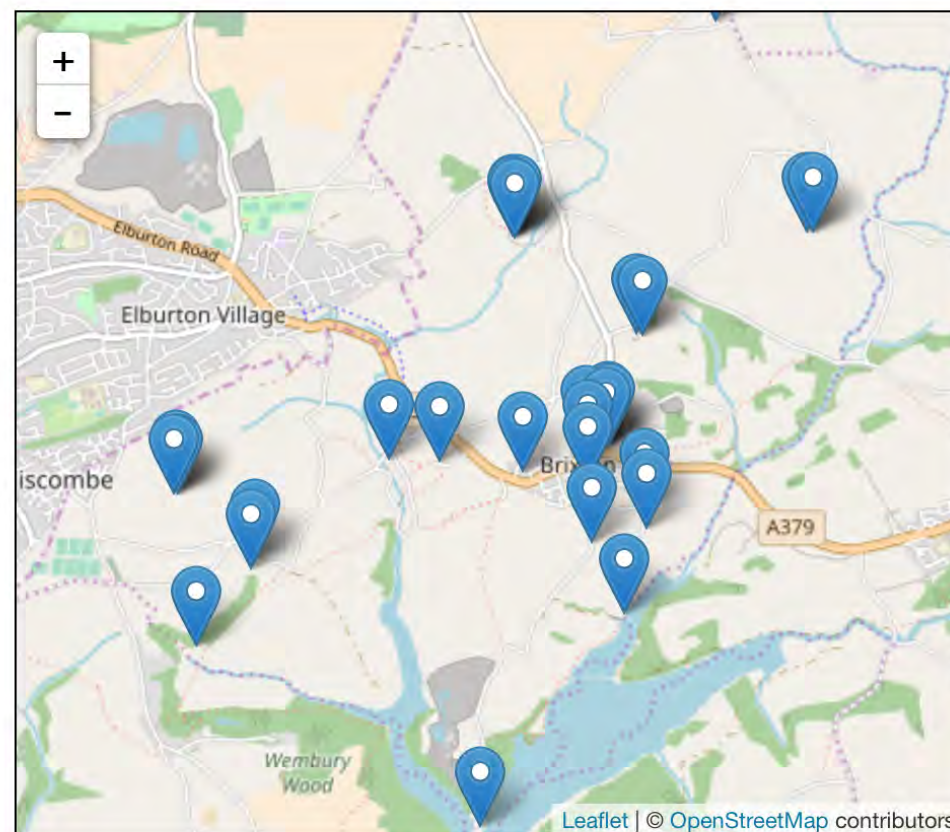
The importance of mature orchards (many of which are in decline) for their historical significance, enchantment and opportunities for pollinators should be recognised for protection. This small and mature orchard should therefore be protected.

**LGS13****LGS13**





1. **II Aylescombe Cottage**
Brixton, South Hams, Devon, PL8
2. **II Barn and Shippen Approximately 50 Metres South South East of Spriddlestone Barton Farmhouse**
Brixton, South Hams, Devon, PL9
3. **II Barn Approximately 25 Metres West South West of West Sherford Farmhouse**
Brixton, South Hams, Devon, PL8
4. **II Bridge Approximately 130 Metres North of Winson Court**
Brixton, South Hams, Devon, PL8
5. **II Bridge over Disused Drive to Kitley House**
Brixton, South Hams, Devon, PL8
6. **II Brixton House**
Brixton, South Hams, Devon, PL8
7. **II Brixton Lodge**
Brixton, South Hams, Devon, PL8
8. **II Brixton War Memorial**
Brixton, South Hams, Devon, PL8
9. **I Church of St Mary**
Brixton, South Hams, Devon, PL8
10. **II Combe Farmhouse**
Brixton, South Hams, Devon, PL9
11. **II Elbridge House**
Brixton, South Hams, Devon, PL8
12. **II Fordbrook Farmhouse Including Outbuilding Adjoining North East**
Brixton, South Hams, Devon, PL8



13. **I Higher Hareston**
Brixton, South Hams, Devon, PL8
14. **II Mud Bank Cottage**
Brixton, South Hams, Devon, PL8
15. **II Outbuilding Approximately 40 Metres East of Spriddlestone Barton Farmhouse**
Brixton, South Hams, Devon, PL9
16. **II Priests' Cottages**
Brixton, South Hams, Devon, PL8
17. **II Shippen and Barn Range Approximately 15 Metres South East of Wollaton Farm House**
Brixton, South Hams, Devon, PL8
18. **II Shippen and Barn Range Approximately 40 Metres East of Higher Hareston**
Brixton, South Hams, Devon, PL8
19. **II Shippen Approximately 15 Metres North North West of Combe Farmhouse**
Brixton, South Hams, Devon, PL9
20. **II Shippen Approximately 30 Metres South West of West Sherford Farmhouse**
Brixton, South Hams, Devon, PL8
21. **II Spriddlestone House**
Brixton, South Hams, Devon, PL9
22. **II Stables Approximately 15 Metres West of West Sherford Farmhouse**
Brixton, South Hams, Devon, PL8
23. **II Steer Point Lodge**
Brixton, South Hams, Devon, PL8
24. **II The Great Barn, Coombe Farm**
Brixton, South Hams, Devon, PL9
25. **II The Wicket**
Brixton, South Hams, Devon, PL8
26. **II West Sherford Farm House Including Outbuilding Adjoining on North East**
Brixton, South Hams, Devon, PL8
27. **II Winson Court Including Adjoining Stables to South West Estates Nos 119 and 120**
Brixton, South Hams, Devon, PL8
28. **II Wiverton House**
Brixton, South Hams, Devon, PL7
29. **II Wollaton Farm House**
Brixton, South Hams, Devon, PL8





The Government's Planning Practice Guidance (PPG) states that:

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.”



NOTE: The majority of planning policy evidence has been referenced from the NPPF 2019, the adopted Plymouth and South West Devon Joint Local Plan (JLP) and Planning for the South Devon AONB - Planning Guidance Version 1.



This document and all supporting information is available at:

http://www.brixtonparishcouncil.org.uk/Neighbourhood_Plan_2016_4508.aspx

