

1. *NP designated area* In the map which shows the NP Designated area (Appendix 1-page A.04) why are two slivers of land at the north end of the parish and one very small area of land not included in the designated area of Sherford New Town, which is excluded from the designated area for the Neighbourhood Plan? Has the boundary of the Sherford Town Council area resolved this? Please can I have the Parish and District Council's views?

I enclose the Designation Plan (enclosure 1) and a statement (enclosure 2), submitted with the Application to Designate, explaining the rationale. It appears to me that in designating you have three areas, the two slivers to the north and an indent on the western side, that are not within the Sherford allocation so have been designated in the Neighbourhood Plan area. These areas are not physically attached to the substantive Neighbourhood Plan area.

I think we talk to the Examiner about how best the Plan is amended to accommodate these issues.

Noted. Please can SHDC discuss with the Examiner. There is only one sliver to the north.

2. *Policies Map* On a related issue, the Brixton Parish Neighbourhood Plan Policies Map does not seem to extend far enough north as it excludes narrow areas of land to the north east and north west. Please can I have the Parish and District Council's view. Given these areas are in the Designated Area they should logically appear on the Policies Maps. As well as the two areas to the north mentioned by the Examiner there is also the western indent mentioned above.

I think we talk to the Examiner about how best the Plan is amended to accommodate these issues.

Noted. The Policy Map only indicates the parts of the parish affected by relevant BPNP Policies. Please can SHDC discuss with the Examiner to clarify.

3. *Reg 14 consultation* What were the exact dates of the Reg 14 consultation – there seems to be a general reference to this being carried out in November 2018, but no exact dates are given.

According to our records the email (enclosure 3) announcing the Reg 14 was despatched on 1st December 2017. The consultation period ran til 12th January 2018.

Agreed.

4. *HRA Screening* In para 11.2 of the Basic Conditions Statement, it is stated that Assessment under the HRA was not required. However, the SEA and HRA Screening Report dated January 2019, which is on the Council's website, concludes that an Appropriate Assessment is required, and this is included as Appendix 4 to that document. Please can these different conclusions be explained.

I think you have included the first SEA/HRA Screening in the Basic Conditions. As I explained when I wrote to you on 22nd January (enclosure 4) you needed to replace the old SEA/HRA screening with the latest version. The Plan was rescreened due to the inclusion of the Steer Point Road residential site

This is straightforward explain to the Examiner and amend the Basic Conditions Statement accordingly.

The Basic Conditions Statement will be amended as advised by the Council

5. *Policy Env3* Is it intended that policy Env3 will protect all the Priority Habitat mapped in Map Env1? The policy says it “includes” a number of locations but it is not clear whether this is a definitive list. Policy Env3 (b) provides guidance about important woodlands but the mapping in Map Env5 in Appendix 8 does not cover the whole parish and some woodlands are on the edge of the map so their exact extent is not defined. I would be grateful for the Parish Council’s comments, in particular whether these might be better mapped on the Policies Map instead. Also, whether there is any potential overlap between the “important woodlands” mapped in Env5 in Appendix 8 and the “Woodland” category which is marked on Env Map1?

This one is for you.

NOTE: Env3 a. Examples of specific priority habitat are included but it is not a definitive list as there are too many habitats to include within a policy.

Env3 b. Env Map 5 identifies woodland that is important to the landscape character of the parish (not necessarily designated as priority habitat). Env Map 1 identifies designated priority habitats within the whole parish. Given this distinction we would prefer to retain both maps.

6. *Env Map3* The map shows a light green vertical hatched line on two areas of land to the east of Brixton with an Env4 notation, but these are not referred to in the wording of Policy Env4. The same applies to the red, dark green and light green dots which are identified as green corridor “Stepping Stones” in the key. I would be grateful if the Parish Council could explain the link between the mapping and the policy, so that I am clear about the intention behind the drafting of Policy Env4.

Again for you.

NOTE: We assume the comment above ‘east of Brixton’ should read ‘west of Brixton’ - the hatched areas - are specifically referred to in the policy:

Env4. (a) 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 3: Policy Area Env4.

With regard to the reference to ‘stepping stones’ we could add these words to the policy Env4 (b) for clarity. The intention of this strategic policy is to maintain existing planting/trees and look for opportunities for new.

(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 3

7. *Policy Env10* In this policy which deals with the former Steer Point Brickworks site, reference is made to the designated Heritage Coast and adjoining SSSI designations. Are these included in any of the maps which accompany the Neighbourhood Plan?

Again for you.

NOTE: No as this is available on the Government Community Mapping Data for south west Devon:

<http://gis.swdevon.gov.uk/CNET4914LIVE/CMFindIt/>

Do we need to add this link into the Plan document?

8. *Policy Cof1* This policy lists a number of facilities which are being proposed as Assets of Community Value. Has a formal application been made to South Hams District Council to designate these assets? If so, what stage has this reached in the process?

Again for you. If you have made an application and its stuck somewhere in the Council let me know.

NOTE: No formal application has been made yet to SHDC. This is work in progress.

9. *Policy Cof2* This policy refers to the Brixton Parish Community Facilities Plan, but looking at Appendix 5, this seems to be a plan that is proposed rather than one that has already been prepared. Given that Cof2 covers a range of different facilities, one option would be to simply refer in the policy to the longer list of Parish Project Action Plans listed in Appendix 5. I would be grateful for the Parish Council's views on this.

Again for you.

NOTE: We agree to this helpful suggestion

10. *Policy Emp2* Sub clause Emp2a refers to an Employment Area 1 at Chittleburn. Could you confirm where this is mapped? I can see mapping for EMP2 and EMP3 but not EMP1 on Emp Map1 on page 36

EMP 1 is a policy regarding change of use generally not a land use allocation so doesn't need to be shown on the Plan.

NOTED

11. *Policy Dev5* I understand that the intention of policy Dev5 is to reduce on street parking by securing adequate off-street car parking provision in new development. The Parish Council has commented on the response from SHDC regarding Dev5, saying that it does not support the SHDC suggested rewording. However, the SHDC version seems to be more generous in terms of parking provision for two bed dwellings, in that it says "at least two parking spaces". Looking at the wording of the Newton and Noss NDP policy, which the Parish Council has suggested as an alternative, this also seems to be less generous, especially with regards to car parking provision for 3 bed homes. I would be grateful for the Parish Council's views.

Again for you

NOTE: We have reconsidered the comments and suggest the following wording to be substituted:

“In residential developments at least two parking space should be provided for two bed properties, with a further additional parking space for properties with more than 3 bedrooms. For properties of 6 bedrooms or more, at least 4 parking spaces should be provided. Garages will not normally be counted as parking spaces.”

12. *Affordable housing allocation* On page 45 of the plan, it states “In March 2018, South Hams District Council brought land within Brixton village settlement boundary for affordable/community housing”. It would be helpful to have a little more information about this, and, in particular, whether a planning application has been submitted for the site.

I enclose a Document (enclosure 5) which includes details of the scheme. See bullet points below also which elaborate on the proposal.

- An affordable led housing proposal which, subject to planning is likely to deliver 8 units (3 market and 5 affordable rent)
- The site comprises a parcel of land owned by SHDC and an a strip of land to the rear owned by a third party, which will be transferred to SHDC
- Close consultation with Brixton Parish Council and Brixton Neighbourhood Plan Group who are supportive of the proposal
- A detailed design of 2 and 3 bedroom units has been completed (details attached), which will form the basis of a planning application to be submitted during Summer 2019
- Infrastructure design and detailed costings plan underway
- SHDC will fund construction of the development with a view to sale of the market units upon completion and letting the affordable units which will be let at rents capped at LHA rates

NOTED

13. *Policy Env6 Brixton Strategic Countryside*

As part of the examination of the NP, I have been looking at the policies in the recently adopted Plymouth and West Devon Local Plan to assess to what extent the NP is aligned with the latest, adopted version of the strategic policies

I note that the Strategic Landscape Area policy which was included in the Submission version of the Joint Local Plan (JLP) - Policy DEV26 - has been deleted in the final version of the JLP. It has been replaced by a new policy PLY61 which covers the Plymouth Policy Area (PPA) countryside area which aims to reflect and protect its urban fringe role and function. Looking at the updated Policies Map for the JLP I see that, amongst other things, the new policy covers land to the north of Brixton between Brixton village and the new development at Sherford. However, it does not exactly coincide with the area proposed to be protected as an open gap in the NP as shown on the NP Policies map and as described in Policy Env6.

The last stages of the preparation of the Brixton Plan coincided with the Modifications process for the JLP. As such the status of the land covered by Env6 underwent the changes you have set out . Notwithstanding this, the NPG have been adamant in their

wish to include a specific protective Neighbourhood Plan Designation for the area covered by Env 6. As you will note from the Council's Reg 16 comments, reproduced below in *italic*, there have been discussions with the Group regarding this matter:-

“Discussions have taken place with the Brixton Group regarding this Policy replicating National and Local policy. The Group consider this approach is necessary in the light of the Sherford allocation.”

I believe the Council has made its views plain.

NOTED, we strongly agree with SHDC comments above. We wish for Env6 to remain exactly as defined as strategic countryside specific to Brixton rather than as Plymouth's Urban Fringe.