



## Representations

# Brixton Neighbourhood Plan

Client: Wainhomes (South West) Holdings Limited

Consultation stage: First Draft

Project : 17-039  
Plan : Brixton Neighbourhood  
Plan  
Stage : First Draft  
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## 1. Introduction

- 1.1 Emery Planning is instructed to submit representations to the Brixton Neighbourhood Plan (hereafter referred to as the 'Brixton NP') on behalf of the Wainhomes (South West) Holdings Limited (hereafter referred to as 'Wainhomes'). Wainhomes' specific site interest is the land west of Stamps Hill. A site location plan is appended at EP1.
- 1.2 We consider that a number of changes are needed to ensure that the plan meets the basic conditions. In particular, we are concerned that the plan is premature in advance of the forthcoming examination of the Joint Local Plan. Furthermore, we consider that the proposed policies in relation to the AONB and the proposed Strategic Green Space and are neither justified nor consistent with national planning policy, and are unduly restrictive. They could only frustrate, rather than enable, the achievement of sustainable development.
- 1.3 Our client is also promoting the land to the west of Stamps Hill as a sustainable extension to the village, which could make a valuable contribution to the supply of housing in South Hams.
- 1.4 Our detailed representations are set out below, under the following key headings:
  2. The Basic Conditions
  3. National Planning Policy and Guidance
  4. The Development Plan
  5. Response to the draft policies
  6. Summary and conclusions

## 2. The Basic Conditions

2.1 The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by Section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:

- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.
- c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.
- d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
- g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

### 3. National Planning Policy and Guidance

#### National Planning Policy Framework ('the Framework')

- 3.1 The Framework was adopted in March 2012. It sets out the Government's planning policies for England and how these are expected to be applied. The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219 of the Framework, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system.
- 3.2 Paragraph 14 of the Framework sets out the presumption in favour of sustainable development, which is the golden thread running through both plan-making and decision-taking. For plan-making this means that:
- local planning authorities should positively seek opportunities to meet the development needs of their area;
  - Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
    - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
    - specific policies in this Framework indicate development should be restricted.
- 3.3 Paragraph 16 states that the application of the presumption will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:
- develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;
  - plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and

- identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their neighbourhood plan to proceed.

3.4 Paragraph 17 identifies that within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. All of the principles set out (not repeated here for brevity) are relevant to the neighbourhood plan must be considered.

3.5 Paragraph 47 requires that to boost significantly the supply of housing, local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
- identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- set out their own approach to housing density to reflect local circumstances.

3.6 Paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing

should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.

3.7 Paragraph 156 requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

3.8 Paragraph 159 states that local planning authorities should have a clear understanding of housing needs in their area. They should:

- prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:
  - meets household and population projections, taking account of migration and demographic change;
  - addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and

- caters for housing demand and the scale of housing supply necessary to meet this demand;
  - prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.
- 3.9 Paragraph 184 states that Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. [our emphasis]
- 3.10 Paragraph 198 sets out that where a Neighbourhood Development Order has been made, a planning application is not required for development that is within the terms of the order. Where a planning application conflicts with a neighbourhood plan that has been brought into force, planning permission should not normally be granted.

#### National Planning Practice Guidance (PPG)

- 3.11 The PPG was launched in March 2014. It replaced a number of practice guidance documents that were deleted when the PPG was published.
- 3.12 The Government's guidance sets out the correct sequence of events in neighbourhood plan preparation set out at Paragraph: 080 Reference ID: 41-080-20140306 A summary of the key stages in neighbourhood planning which provides (so far as relevant) and subsequent PPG paragraphs:

*“Step 1: Designating neighbourhood area and if appropriate neighbourhood forum*

...

*Step 2: Preparing a draft neighbourhood plan or Order*

*Qualifying body develops proposals (advised or assisted by the local planning authority)*

- gather baseline information and evidence
- engage and consult those living and working in the neighbourhood area and those with an interest in or affected by the proposals (e.g. service providers)

- talk to land owners and the development industry
- identify and assess options
- determine whether European Directives might apply
- start to prepare proposals documents e.g. basic conditions statement

*Step 3: Pre-submission publicity & consultation*

*The qualifying body:*

- publicises the draft plan or Order and invites representations
- consults the consultation bodies as appropriate
- sends a copy of the draft plan or Order to the local planning authority
- where European Obligations apply, complies with relevant publicity and consultation requirements
- considers consultation responses and amends plan / Order if appropriate
- prepares consultation statement and other proposal documents"

*Step 4: Submission of a neighbourhood plan or Order proposal to the local planning authority*

- Qualifying body submits the plan or Order proposal to the local planning authority
- Local planning authority checks that submitted proposal complies with all relevant legislation
- If the local planning authority finds that the plan or order meets the legal requirements it:
  - publicises the proposal for minimum 6 weeks and invites representations
  - notifies consultation bodies referred to in the consultation statement
  - appoints an independent examiner (with the agreement of the qualifying body)..."

3.13 Paragraph: 001 Reference ID: 41-001-20140306 *What is neighbourhood planning?* provides (so far as relevant):

*"...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."*

3.14 Paragraph: 003 Reference ID: 41-003-20140306 What are the benefits to a community of developing a neighbourhood plan or Order? provides:

*“...Neighbourhood planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next ten, fifteen, twenty years in ways that meet identified local need and make sense for local people. They can put in place planning policies that will help deliver that vision or grant planning permission for the development they want to see....”*

3.15 Paragraph: 004 Reference ID: 41-004-20140306 What should a Neighbourhood Plan address? provides:

*“...A neighbourhood plan should support the strategic development needs set out in the Local Plan and plan positively to support local development (as outlined in paragraph 16 of the National Planning Policy Framework.”*

3.16 Paragraph: 007 Reference ID: 41-007-20140306 What weight can be attached to an emerging neighbourhood plan when determining planning applications? provides:

*“...The consultation statement submitted with the draft neighbourhood plan should reveal the quality and effectiveness of the consultation that has informed the plan proposals....”*

3.17 Paragraph: 009 Reference ID: 41-009-20140306 Can a Neighbourhood Plan come forward before an up-to-date Local Plan is in place? provides:

*“...Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:*

*the emerging neighbourhood plan*

*the emerging Local Plan*

*the adopted development plan*

*with appropriate regard to national policy and guidance.*

*The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.*

*The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans....”*

3.18 Paragraph: 040 Reference ID: 41-040-20140306 What evidence is needed to support a neighbourhood plan or Order? provides:

*“While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.*

*A local planning authority should share relevant evidence, including that gathered to support its own plan-making, with a qualifying body. Further details of the type of evidence supporting a Local Plan can be found here Local Plan.”*

3.19 Paragraph: 041 Reference ID: 41-041-20140306 How should the policies in a neighbourhood plan be drafted? provides:

*“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”*

3.20 Paragraph: 042 Reference ID: 41-042-20140306 Can a neighbourhood plan allocate sites for development? provides:

*“A neighbourhood plan can allocate sites for development. A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria. Guidance on assessing sites and on viability can be found here and here.” [These link to PPG, Housing and economic land availability assessment and Viability]*

3.21 Paragraph: 043 Reference ID: 41-043-20140306 What if a local planning authority is also intending to allocate sites in the same neighbourhood area? provides:

*“If a local planning authority is also intending to allocate sites in the same neighbourhood area the local planning authority should avoid duplicating planning processes that will apply to the neighbourhood area. It should work constructively with a qualifying body to enable a neighbourhood plan to make timely progress. A local planning authority should share evidence with those preparing the neighbourhood plan, in order for example, that every effort can be made to meet identified local need through the neighbourhood planning process.”*

3.22 Paragraph: 047 Reference ID: 41-047-20140306 What is the role of the wider community in neighbourhood planning? provides:

*“A qualifying body should be inclusive and open in the preparation of its neighbourhood plan or Order and ensure that the wider community:*

*is kept fully informed of what is being proposed*

*is able to make their views known throughout the process*

*has opportunities to be actively involved in shaping the emerging neighbourhood plan or Order*

*is made aware of how their views have informed the draft neighbourhood plan or Order.”*

3.23 Paragraph: 048 Reference ID: 41-048-20140306 Should other public bodies, landowners and the development industry be involved in preparing a draft neighbourhood plan or Order? provides:

*“A qualifying body must consult any of the consultation bodies whose interest it considers may be affected by the draft neighbourhood plan or Order proposal. The consultation bodies are set out in Schedule 1 to the Neighbourhood Planning (General) Regulations 2012 (as amended). Other public bodies, landowners and the development industry should be involved in preparing a draft neighbourhood plan or Order. By doing this qualifying bodies will be better placed to produce plans that provide for sustainable development which benefits the local community whilst avoiding placing unrealistic pressures on the cost and deliverability of that development.”*

3.24 Paragraph: 051 Reference ID: 41-051-20140306 Is additional publicity or consultation required where European directives might apply? provides:

*“European directives, incorporated into UK law, may apply to a draft neighbourhood plan or Order. Where they do apply a qualifying body must make sure that it also complies with any specific publicity and consultation requirements set out in the relevant legislation. The local planning authority should provide advice on this.*

*The legislation that may be of particular relevance to neighbourhood planning is:*

- the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)*
- the Conservation of Habitats and Species Regulations 2010 (as amended)*
- the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended)*

*It may be appropriate, and in some cases a requirement, that the statutory environmental bodies English Heritage, the Environment Agency and Natural England be consulted."*

3.25 Paragraph: 053 Reference ID: 41-053-20140306 Does the local planning authority consider whether a neighbourhood plan or Order meets the basic conditions when a neighbourhood plan or Order is submitted to it? provides:

*"...The local planning authority should provide constructive comments on an emerging plan or Order before it is submitted."*

3.26 Paragraph: 066 Reference ID: 41-066-20140306 When should a qualifying body consider the basic conditions that a neighbourhood plan or Order needs to meet? provides:

*"Throughout the process of developing a neighbourhood plan or Order a qualifying body should consider how it will demonstrate that its neighbourhood plan or Order will meet the basic conditions that must be met if the plan or order is to be successful at independent examination. The basic conditions statement is likely to be the main way that a qualifying body can seek to demonstrate to the independent examiner that its draft neighbourhood plan or Order meets the basic conditions. A qualifying body is advised to discuss and share early drafts of its basic conditions statement with the local planning authority."*

3.27 Paragraph: 067 Reference ID: 41-067-20140306 What should a local planning authority do to assist a qualifying body in considering the basic conditions? provides:

*"A local planning authority should provide constructive comments on the emerging neighbourhood plan or Order proposal prior to submission and discuss the contents of any supporting documents, including the basic conditions statement. If a local planning authority considers that a draft neighbourhood plan or Order may fall short of meeting one or more of the basic conditions they should discuss their concerns with the qualifying body in order that these can be considered before the draft neighbourhood plan or Order is formally submitted to the local planning authority."*

## 4. The Development Plan

- 4.1 Neighbourhood Plans must be in general conformity with the strategic policies of the wider local area. However in this instance the Joint Local Plan (JLP) is currently emerging, and will shortly be subject to examination. Wainhomes has objected to the draft JLP and is participating in the examination.
- 4.2 The draft Neighbourhood Plan has been prepared, understandably, on the basis of the submitted draft JLP. However it is important to recognise that the draft JLP is subject to examination, and may be found to be 'unsound' through the examination process, and/or amendments to the JLP may be required. This may have implications for the Brixton NP.

## 5. Response to the draft policies

- 5.1 We consider that a number of changes to specific policies are needed to ensure that the plan meets the basic conditions. We address each policy in turn below.

### Policy Env6

- 5.2 The 'intent' for the policy is set out at page 16 of the plan:

*"Given the substantial amount of new housing within Brixton village since 2014, and the planned 5,500 houses being built in the northern third of the parish in the new town of Sherford, the Brixton Strategic Green Space has been designated to provide a protected landscape zone to the north and west of Brixton village."*

- 5.3 Firstly, the amount of new housing within Brixton since 2014 does not justify a restrictive policy tier above and beyond existing settlement boundary / countryside policy. If housing requirements and needs are being adequately met and the JLP is up-to-date, then the policies of the JLP will apply in accordance with the presumption in favour of sustainable development. If they are not, then the tilted planning balance would apply and the policies would need to be given reduced weight. Under such circumstances, the proposed additional policy tier could only serve to frustrate, rather than contribute to, the achievement of sustainable development. It could also frustrate the achievement of a 5 year housing land supply, contrary to national planning policy and the JLP. As such the policy does not meet the basic conditions.
- 5.4 Secondly, the planned new housing at Sherford does not justify a protected landscape zone to the north of the village. It poses no risk whatsoever to the rural setting of Brixton, as is erroneously suggested in the plan. The Sherford development provides for a significant country park to the south of the proposed development, north of Brixton, and this in itself would prevent any physical or perceived merger between the two settlements. The adopted Area Action Plan for Sherford also specifically provides for the protection of the ridge north-east of Brixton from development. As such the topography of the land to the north of Brixton means that there is no prospect of inter-visibility between the two settlements. We also note that other development options were assessed as part of the evolution of the Sherford proposals, including extending development further south towards Brixton. Paragraph 12.12 of the Area Action Plan appraises other options, and explains why these were not taken forward:

*“The development would have closed the gap on Brixton and it compromised the need to create a defensible eastern edge to the development.”*

- 5.5 Thirdly, without prejudice to our view that the ‘Strategic Green Space’ is not justified in principle, we consider that it is unreasonable to include the land to the west of Stamps Hill (see appendix EP1). The land has no visual connection with the Sherford development, and its development would not result in any physical or perceived joining up of the two settlements. It is also important to note that residential development to the east of Stamps Hill extends up to the line of the allotments to the east of the road. The development of the land west of Stamps Hill (to the south of the allotments) would not bring the two settlements any closer together. Therefore if there is to be a ‘Strategic Green Space’, the only logical drawing of the boundary would be along the southern boundary of the allotments, with the land west of Stamps Hill (as shown at appendix EP1) excluded.
- 5.6 In addition to our main in principle points, we are concerned that the policy indicates that the first review of the plan will not be before 2023. Development plan documents need to be reviewed regularly and kept up-to-date. There may be a change in circumstances which renders the plan out-of-date prior to 2023; for example a housing supply shortfall or an increase in housing need.

### Policy Cof3

- 5.7 It will not be necessary for all developments to incorporate public landscaped space and provision for safe children’s play within the development. This will depend upon the characteristics of the site and the need for open space, having regard to provision within the wider area. We therefore consider that the policy wording should be amended as follows:

*“**Where necessary,** developments of more than 5 homes shall incorporate adequate public landscaped space and provision for safe children’s play within the development.” (additional text highlighted in bold)*

### Policy Dev2

- 5.8 Reference is made within the policy to “important views, outlooks or skylines”. However these are not specified or defined within the draft plan. Further clarification is required, including identification of specific views with evidential justification.

- 5.9 Part b of the draft policy is permissive of development where it is small scale (1 - 2 dwellings) and can be delivered sustainably and not in conflict with any other policy. We consider that there is no justification for applying a limit of 1-2 dwellings. Smaller developments are highly unlikely to deliver infrastructure and affordable housing, and housing need may dictate that larger developments are required. There is therefore no evidence to justify the proposed approach of limiting new development to only 1-2 dwellings.
- 5.10 Part c of the policy is non-committal to the provision of additional housing even in the event that a need for essential, affordable local housing is identified through a Housing Needs Survey. We consider that a far more pro-active approach is required having regard to the policies of the Framework, which require the supply of housing to be boosted significantly, a 5 year housing land supply to be maintained and all housing needs to be identified and met (not just limited to affordable housing).
- 5.11 We note that the introductory text to the policy states that *“despite the increase in population, community facilities have reduced.”* We refer to the Taylor Report (2008), which assessed housing in rural areas and set out recommendations which were incorporated within the Framework. In particular, the summary of Section 1 provides:
- “Planning must not determine the future development of rural communities against a narrow tick-box approach to sustainable development, assessing communities as they are now and not what they could be. In too many places this approach writes off rural communities in a ‘sustainability trap’ where development can only occur in places already considered to be in narrow terms ‘sustainable’. The question planners must address is “how will development add to or diminish the sustainability of this community?” taking a better balance of social, economic, and environmental factors together to form a long term vision for all scales of communities. A mix of housing and employment opportunities are essential for the sustainability of rural communities.”*
- 5.12 It is therefore clear if community facilities are reducing, planning should be looking at how this can be addressed through the provision of additional housing and employment opportunities which would assist in reversing the decline. A policy framework which seeks to restrict development on the basis of a reduction in services is only likely to accelerate the decline further.
- 5.13 The proposed policy is therefore inconsistent with national planning policy, and could only serve to frustrate the achievement of sustainable development.

### Dev3

- 5.14 The policy requires housing development to comply with the CLG Technical housing standards – nationally described space standard. It is not clear what local evidence or circumstances supports the inclusion of the national standard in a local development plan policy.

### Dev5

- 5.15 The policy requires all new residential developments to provide at least one parking space per bedroom. For example, under this policy a 4 bedroom dwelling would need to provide 4 car parking spaces. Such provision is unnecessary and excessive relative to the likely number of cars within a household.

### Dev7

- 5.16 The policy states:

*“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.”*

- 5.17 Further clarification is required in relation to what this policy would apply to, and how such development could “adversely impact on the social wellbeing and character of the village”. As drafted the policy is unclear in its intention and potential application.

### Delivering the plan

- 5.18 There is further reference at page 38 to the plan being reviewed every 5 years. Please refer to our comments in relation to Policy Env6. We consider that there may be a need to review the plan earlier than 2023. We therefore consider that the plan should be amended to state that it will be regularly reviewed, having regard to national planning policy, the strategic policies of the development plan and any other material change in circumstances.

## 6. Proposed housing allocation

6.1 Wainhomes is promoting the land west of Stamps Hill for residential development. Details of the site are set out further below. The site is considered to be suitable for development, as confirmed in the emerging Joint Local Plan evidence base, and is capable of contributing to meeting housing needs in the area. We would welcome the opportunity to discuss the potential allocation of the site further with the Brixton Parish Neighbourhood Plan group.

### Land west of Stamps Hill

6.2 The site comprises approximately 2.3ha located to the north of the village, immediately west of Stamps Hill and north of the dwellings at Cherry Tree Drive.

6.3 The site is greenfield and is currently used for agriculture, with hedgerows and trees to the site boundaries. The site is bordered existing residential development to the south and east, agricultural land to the west and allotments to the north.

6.4 The site was assessed by South Hams Council as part of the evidence base for the 'Thriving Towns and Villages' consultation in July 2016 (Brixton Parish Site Information Pack). The site was assessed under reference: SH\_07\_13\_16. The overall conclusion is that there are "*Limited constraints and/or constraints which possibly can be overcome*". The assessment states:

*"Limited constraints to development. As such it is considered there could be potential for development on this site, with the footprint for development subject to landscape impact assessment.*

6.5 The site has recently been subject to a planning application for 64 dwellings (LPA ref: 3884/16/FUL), which was refused on the 18th August 2017. The application was supported by a suite of supporting technical documents which demonstrate that the site could be brought forward sustainably, and these are available on South Hams Council's website. Wainhomes is currently considering an appeal against the decision.

## 7. Summary and conclusions

- 7.1 We consider that a number of changes are needed to ensure that the plan meets the basic conditions. In particular, we are concerned that the plan is premature in advance of the forthcoming Local Plan examination. Furthermore, we consider that the proposed policies in relation to the AONB and the proposed Strategic Green Space and are neither justified nor consistent with national planning policy, and are unduly restrictive. They could only frustrate, rather than enable, the achievement of sustainable development.
- 7.2 Wainhomes is specifically promoting the land west of Stamps Hill (site location plan at EP1) for residential development. The site is considered to be suitable for development, as confirmed in the emerging Joint Local Plan evidence base, and is capable of contributing to meeting housing needs in the area. We would welcome the opportunity to discuss the potential allocations of the site further with the Brixton Parish Neighbourhood Plan group.

## 8. Appendices

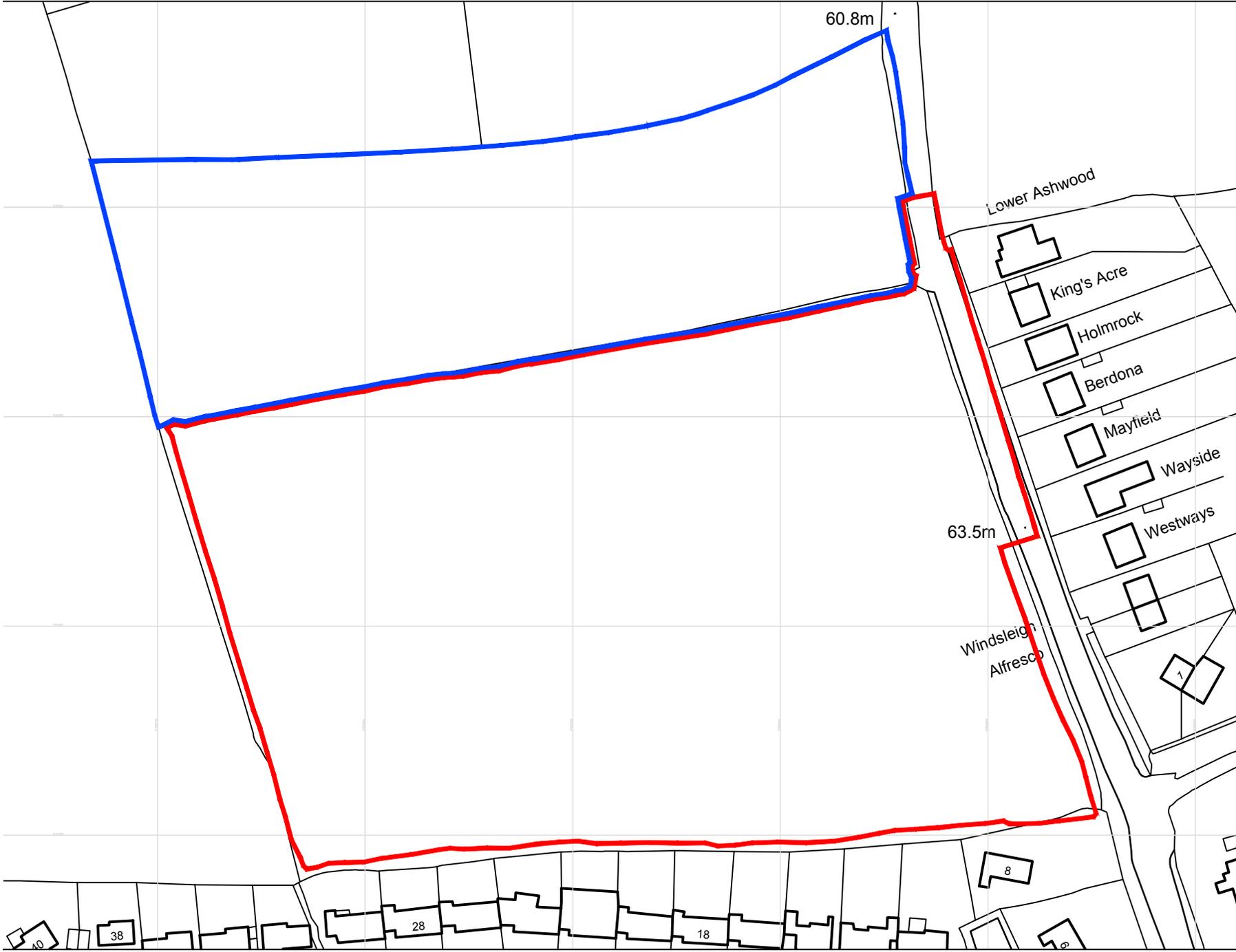
- EP1. Site location plan - Land west of Stamps Hill

EP1



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REVISIONS:



LOCATION PLAN

SCALE: 1:1250 @ A4  
0 5 10 15 (m)

DATE: OCTOBER 2016  
DRAWN: DW

DRAWING TITLE: LOCATION PLAN  
DRAWING NO: 0613-101

