



BRIXTON PARISH COUNCIL

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Your ref APP/K1128/W/18/3196171

Ms Holly Dutton
 Case Officer
 The Planning Inspectorate
 Room 3P
 Temple Quay House
 2 The Square
 Bristol
 BS1 6 PN

Dear Ms Dutton

Town & Country Planning Act 1990
Appeal by Wainhomes (South West) Holdings Ltd Appeal
Site Address: Land to the west of Stamps Hill, Brixton, PL8 2DB

I am responding to your letter dated 13th March 2018 addressed to The Planning Officer at South Hams District Council in connection with this Appeal. I am writing to you on behalf of Brixton Parish Council which submitted a full report to the District Council objecting to this application in March 2017. A copy of which will be in your file. The purpose for writing now is to respond to specific points in the Appeal Document and to up date you.

I respond to the Appeal Document on a page by page basis.

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Para 6.2

Very serious concerns continue to be expressed to Brixton Parish Council by the whole community about the damaging impact of further housing development in and around Brixton village. Since this application was lodged the Parish Council has been consulted on further planning applications for additional housing i.e. 5 in the grounds of Elbridge House a listed building with direct access into the village, 5 at a site in Lodge Lane as well as an application for 25 older persons bungalows at the top of the Canes Orchard development. Furthermore since January 2018 South Hams District Council has consulted with Brixton Parish Council about a project to develop a Community Housing Scheme of 5/8 houses on land in its ownership within the village boundary.

There is evidence that fields and hedges adjacent to the village are being cleared in advance of other applications for housing being submitted to the local authority. This continual threat of the impact of over development, damage to the environment, loss of tranquillity, loss of

important trees, loss of privacy and harm to open space within and adjacent to the village does effect the social wellbeing of the people who live in the village. For residents living in Brixton this level of continuous uncertainty about further housing developments in the village creates a constant wariness about both the expected and unexpected for their lives and their properties. This application for 64 houses creates a second urban mass on the edge of the village resulting in the loss of countryside and significant change in character of the environment for the local community which will inevitably impact on its social and emotional well being.

Para 6.3

The character of this small rural village on the A379 is being eroded by the current unplanned significant development since 2014. For example the original plan adopted by South Hams District Council for Venn Farm, a working farm in the centre of Brixton village until 2016, was for 50 houses. Planning permission has been granted subsequently for a total of 90 houses in the now renamed Canes Orchard.

Para 6.4 & 6.5

Unless the significant major road works involving demolition of property on Red Lion Hill are proposed and supported by Devon County Highways the issue of safe access to the village and A379 remains critical for motorists and pedestrians. There is no safe pedestrian access to the village. There is no footpath/pavement on the narrowest part of the road on Red Lion Hill which is just wide enough for 2 cars to pass.

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Para 8.3 Plymouth & South Hams Joint Local Plan

The Inspector, Wendy Burden DipTP MRTPI and her assistant Inspector Yvonne Wright Bsc (Hons) DIPT&CP have completed the examination of the Plymouth and South West Devon Joint Local Plan. (JLP). They have indicated that they may set out interim findings at a date to be confirmed. Policy TTV30 Figure 5.8 of the JLP gives an indicative level of "New Housing in Sustainable villages" in Brixton as 10. The Brixton Neighbourhood Plan group has used this indicative level as the basis for their Development Policy.

From the refusal notice for Stamps Hill

'The proposed development at Stamps Hill is in the countryside and will result in a significant extension and expansion of the village of Brixton which already has sites coming forward providing significant amounts of new housing that exceed the housing needs of the Parish. The proposed development will add substantially to the cumulative impact of new development in the village that delivered as unplanned development in a short time frame will adversely impact on the social wellbeing and character of the village. As such the proposed development is not sustainable and is contrary to principles of the NPPF, in particular paragraphs 7, 14, 17 and 55 and is contrary to Policies CS1 and DP15 of the South Hams Local Development Framework and Policies SPT1, SPT2 and TTV30 and TTV31 of the emerging Plymouth and South West Devon Joint Local Plan.

The proposed development cannot provide safe pedestrian access for all users from the site to the village facilities and as such is not sustainable. The development is contrary to the principles of the NPPF in particular para 32 and is contrary to Policy DP7 of the South Hams Local Development Framework and Policies SPT1, DEV10 and DEV31 of the emerging

Plymouth and South West Devon Joint Local Plan. The proposed development would be likely to result in a junction which does not provide adequate visibility from and of emerging vehicles, contrary to paragraph 32 of the National Planning Policy Framework.

The site of the proposed dwelling is not a sustainable location without a safe pedestrian route to reach the facilities within the village of Brixton, contrary to policies CS1 and DP1 of the South Hams Local Development Framework and policies DEV10 and DEV20 of the emerging Plymouth and South West Devon Joint Local Plan as well as the National Planning Policy Framework 2012'

Brixton Neighbourhood Plan

The statutory consultation required by Regulation 14 for the emerging Brixton Neighbourhood Plan has been completed and the final draft for submission to the Planning Inspector is now being prepared. Following consideration of the responses to the consultation this land which is included in the land to the north of the village has been designated as Strategic Countryside. The edge of the country park for the new town of Sherford with 5,500 new homes is less than a mile from this site.

Policy Env 6 in the Neighbourhood Plan states 'The area identifies as the Brixton Strategic Countryside shall be safeguarded during the Plan period (2014-2034) except in the event that 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. The review will also consider the development progress of Sherford and any impact on Brixton Strategic Countryside'.

'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'

It is considered vital to protect the landscape character in this area whilst ensuring that the new town of Sherford and its community park have the ability to evolve without impacting on the rural setting to the north of Brixton village.

8.4 Affordable Housing

The recent Housing Needs Report dated April 2016 identified the need for 11 Affordable Homes and 18 market homes in the next 5 years. This number has been far exceeded with the development at Canes Orchard with a total of 90 dwellings including 24 affordable units.

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8.5 This site does not represent a logical rounding-off opportunity sitting comfortably with the character and appearance of the existing built form. It is not adjacent to the built up area and it is not enclosed on 2 sides by development. There are no natural or safe connections to the village. This proposal is for a second anonymous urban mass to be located in the countryside adjoining the village. Vehicular and pedestrian access is unsafe in this proposal.

Other issues for update

Sewage

The proposal for the management of sewage from this site is for a pumping station to be located at Stamps Hill with gravity flows to the Brixton Sewage Treatment Works on the River Yealm.

Recent data (SWW EDM Return 2017) supplied by DEFRA for the calendar year 2017 show that the frequency of spills of raw sewage from the Brixton Sewage Treatment Works for Brixton Village into the River Yealm has increased. This is the latest full annual report available under current new reporting procedures.

The standard set in the Water Framework Directive (WFD) sets a standard of 10 or less significant spills per annum, the 2017 data shows Brixton sewage works as having 13 such spills in 2017 such spills mean that raw sewage is being discharged for in excess of a 12 hour period spills below 12 hours duration are not included and data in respect of sub 12 hour spills has not been supplied,

The shellfish monitoring data (at Fox Cove River Yealm ref B031E) over the last ten years shows a geometric mean reading of 796 e.coli/100g shellfish flesh, the 2017 geometric mean was 1702 e.coli/100g shellfish flesh clearly showing a significant deterioration in water quality.

Under current building regulations the sewage from new development will exclude all rainwater and be just sewage, but then it joins the existing sewage network which currently exists near the entrance to Cherry Tree Drive after this point it will then include rainwater from the many existing properties using the current combined sewage/rain network.

The sewage volumes from the 64 houses at Stamps Hill will contribute to existing flows in excess of capacity which are demonstrated by the data as placing raw sewage into the river Yealm.

The Environment Agency (EA) has confirmed that Brixton Sewage Treatment Works is currently subject to enforcement action by the EA. The EA is not satisfied with how the Sewage Treatment Works is being operated, this would indicate that even if South West Water (SWW) has sufficient capacity at Brixton the EA is not happy about how STW is operated.

SWW has not demonstrated/evidenced that there is sufficient capacity at the Sewage Treatment Works on the River Yealm to treat the amount of sewage from the proposed development at Stamps Hill.

Local facilities

During the last year the village shop and Post Office which had limited opening hours have changed hands. The shop and Post Office are now under new ownership with a change purpose and space. The space is now shared with an art gallery, art studio, teaching space and a small café. The considerably condensed shop space provides basic provisions and is open from 9.00-12.00 noon and 3.00-5.00pm Monday to Friday. The Post Office is open on much reduced and restricted hours 9.00-12.00 noon Monday – Friday. Neither the shop nor the Post Office is open on Saturdays or Sundays. On street parking facilities for this facility are extremely limited.

There is no public car park in Brixton.

The local primary school is at capacity having an 'Outstanding' Ofsted rating and attracts parents from across the area. Other nearest local primary schools are at least 1.5 miles from the site and would have to be accessed by car. There is a day nursery which acts a feeder to the primary school.

The nearest Health Centre is at Yealmpton. The distance from the centre of Brixton village to the Medical Centre is 2.3 miles accessed via the A379 – a busy main commuter route to and from the city of Plymouth to Kingsbridge in the South Hams. It is not within convenient walking distance. The walking route is a shared path with cyclists at least 40 minutes from Brixton Village to the Medical Centre via a permissive path through agricultural land joining the pavement running beside the busy A379 at Yealmpton. Only fit and well people can walk this hilly and in places very steep route to Yealmpton to access medical care otherwise access is by the unreliable bus service or by private car. It is not safe to walk along the A379 from Brixton where there is no pavement. Many residents of Brixton drive to Plymstock to access medical services from the GP practices, pharmacists and chemists located there. There is no chemist or pharmacist within 5 miles radius of Brixton.

Community facilities in the village are limited. The school hall is a shared facility available to the community after school hours and in the school holidays for recreation and leisure purposes and includes a small community room for meetings available all year round. There are 2 play spaces in the village.

The village has a very popular pub 'The Foxhound' and a restaurant 'Just Williams'. St. Mary's Church provides a focal building for the centre of the village.

There is no major employer or employment in the parish. Employment opportunities exist in the local garden centre, and other small scale employment e.g. fish & chip shop, the pub, small scale light weight industrial fabrication, car sales etc.

Loss of privacy, tranquillity and security for neighbours in Cherry Tree Drive

Residents of Cherry Tree Drive continue to be concerned about the impact of noise, disturbance, loss of tranquillity, loss of privacy and security and possible anti social behaviour due to the proximity of the proposed development to their properties. Currently the only barrier between the houses in Cherry Tree Drive and the proposed development is a Devon bank which would not provide an effective boundary to prevent access for people and dogs into these privately owned properties.

Design/impact on character of the area/landscape

The proposed development is essentially a second ubiquitous urban estate located in the countryside on the edge of Brixton village. Its design has no consideration of the impact of such a housing mass in the countryside or its impact on the houses in Cherry Tree Drive. The design does not take into account the setting of the rural character of the site overlooking allotments and farm land with far reaching views into open countryside and to Dartmoor or the integrity and significance of Brixton as a small country village surrounded by open countryside including the South Hams Area of Outstanding Natural Beauty to the south of the A379.

Lack of Play and Amenity Space

Given the size of the development no suitable play or amenity space has been identified for this development.

Bus Services

The daily bus service to Brixton from the South Hams and to and from Plymouth is infrequent and unreliable. There is no bus service on a Sunday. As there is a lack of a reliable and regular bus service either to Plymouth or into the South Hams plus the distance residents of Brixton need to travel to access supermarkets, medical services, leisure facilities and employment in Plymouth car ownership is essential for day to day necessities and services.

This update from Brixton Parish Council provides further information to support the Parish Council's objection to this planning application.

Yours sincerely

Mrs Elizabeth Hitchins
Chairman Brixton Parish Council