

**RECOMMENDATIONS OF Brixton Parish Council
ON PLANNING APPLICATION REFERENCE 3884/16/FUL**

To:

Development.management@southhams.gov.uk

Proposal: 3884/16/FUL

Re-advertisement (Amended highways information and amendments to site plan, layout and elevations and omission of trim trail) Erection of 64no. residential dwellings, associated roads, drainage, landscape, garages and parking.

Location: Land at Sx 553 524, West of Stamps Hill, Brixton Devon

No comments to make

Support

Objection because

SUGGESTED POSSIBLE CONDITIONS or REASONS FOR REFUSAL:

In considering this planning application Brixton Parish Council conducted a site visit with the applicant on the Tuesday 27th June 2017 at land at Stamps Hill and held a Parish Council meeting to discuss the planning application on the 28th June 2017 attended by 38 members of the public.

Brixton Parish Council objects to this planning application for the following reasons (all of which have equal importance)

1. Summary of objections:

1. The application is contrary to, and conflicts with a number of core principles and policies set out in the National Planning Policy Framework (NPPF).

2. The application is not in accordance with the South Hams Local Plan (SHLP) – LDF Dev 15. *‘Within the South Hams there is considerable pressure for new development in the countryside. Some proposals in the countryside can lead to unsustainable development which, individually and cumulatively, change its rural character. In order to protect the quality and character of the countryside it is essential to prevent inappropriate development.’*

3. The application is not in accordance with the emerging Plymouth and South West Devon Joint Local Plan (JLP) 2014-2034, specifically Policies – SO10, TTV30 Figure 5.8, TTV31, DEV1, DEV24, DEV25, DEV30, and DEV32.

4. The application is not in accordance with the emerging Brixton Neighbourhood Plan 2014 - 2034, specifically Policies – 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 or skylines, local amenity, traffic, parking or safety.

b). Elsewhere in the parish development will be strictly controlled and only permitted where it can be delivered sustainably and requires a countryside location, or 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.

5. The application does not meet the sustainability criteria as established by the Feniton Appeals (APP/U1105/A/132191905) where the Inspector found that “substantially increasing the number of residences in a settlement without proportionate increases in the provision of local shops, infrastructure, employment opportunities and other local services risks eroding community cohesion” (para 87).

6. There are major safety issues with pedestrian and vehicular access.

7. There are not sufficient material considerations in favour of the development so as to outweigh the provisions of the Development Plan particularly in terms of restricting development in the countryside.

8. The adverse impacts of permitting these proposed developments would significantly and demonstrably outweigh the benefits.

9. There is a serious fear in the community that medium density urban housing of a ubiquitous and monotonous mass as proposed in this application develops a model which will erode the character of Brixton as a rural village.

2. Negative impact on the identity of the village of further housing development in Brixton

2.1 Very serious concerns continue to be expressed by the whole community about the destructive impact of any further housing development in and around Brixton village. The village of Brixton, gateway to the South Hams, is centred on the Church, a shop with a part time Post Office, a pub and a primary school. The village has a strong sense of identity based on its history and significance as a rural community where change has been incorporated incrementally over the years. Gradual development and change reflecting the needs of the community over time has given the village distinctiveness and character and for its residents an appreciation of Brixton as a special place.

2.2 This application relates to land at Stamps Hill which is outside the village development boundary. The land has no natural connectivity to the village and its community. It is part of the agricultural heritage and landscape of the village and parish and is being used for arable farming. If approved this application to build 64 homes would increase the total number of houses built or with planning permission in the Brixton Parish since 2014 to 185. In 2009 following consultation by the Princes Trust South Hams District Council as part of the Local Development Plan agreed that 50 new houses should be built in Brixton village. The chosen site was land at Venn Farm.

Since that time the number of houses on the now Canes Orchard development has increased to potentially 115 (subject to outline planning permission for circa 29 houses in Phase 3 of Canes Orchard and a recent application for 25 over 55's bungalows on the same site). This proposed further 64 homes will destroy the character of the village community.

2.3 A further 32 new homes have been built in and around the village or have planning approval as part of infill or change of use. Canes Orchard will potentially provide the village with an urban estate of 90 homes impacting on the identity and the integrity of Brixton as a village in a rural and farming community located in the South Devon Area of Outstanding Natural Beauty. The Plymouth and South West Devon Joint Local Plan 2014 - 2034 (JLP) currently out for consultation has identified that 10 houses are needed in Brixton in the lifetime of the plan - 20 years. A previous Officer's Report (App. Ref. 1825/16/OPA – Canes Orchard) suggested that this indicative figure of 10 dwellings was a minimum figure and not to be regarded as a ceiling, although there is no clear basis for this particular interpretation of housing need. Given that since 2014 211 houses have been built, have planning permission or are in the process of obtaining planning permission the need for this amount of houses has already been met and exceeded in the parish.

2.4 Furthermore, it should be noted that although previous Officer's Reports have found Brixton to be a "sustainable location" for residential development, it does not follow that any and all further residential development must necessarily be sustainable too. The question of whether or not a particular proposal constitutes "sustainable development" is not simply a matter of location, but involves a wide variety of other considerations.

2.5 The capacity of any individual settlement to absorb residential development is clearly subject to constraints and that capacity cannot, in any event, be regarded as limitless. Any objective consideration of this current development proposal must take into consideration the cumulative impact of this proposal together with those residential developments already permitted. The effect of those permissions when taken together with this current application would be to increase the adverse impacts of this proposal in both a significant and demonstrable manner, in terms of overall sustainability, adverse transport effects, increased journeys by private car, social inclusion and over-development of the settlement.

2.6 The consideration of the location of residential development, the imposition of specific numerical limits and such matters as objectively assessed housing need are all matters that will be considered at the Examination in Public, which is the proper forum for such analysis, and this process should not be usurped by speculative and opportunistic development proposals seeking to take advantage of the 5 year housing land supply situation.

2.7 The emerging JLP now that the Regulation 19 Consultation phase has been completed, will be subject to an Examination in Public (EiP) this Autumn, and the Councils hope that the new JLP will be adopted relatively shortly thereafter. As such, the JLP may be regarded as at an advanced stage and consequently afforded significant weight in the assessment of this application.

2.8 Brixton village has a very limited range of local facilities. The Post Office opening hours are restricted during the week and there is no Saturday opening. There is a limited and unreliable bus service and no bus service on Sundays. The occupiers of houses in this proposed development would most likely travel out of Brixton for employment, schools, leisure and major shopping purposes.

2.9 Siting a new housing development where such facilities are not readily accessible is not sustainable or in the interest of the village as a community.

2.10 There is no natural connectivity to the village and no recognition in this application of the rural nature of the location. It is a quasi-urban development in the countryside. This proposed development is a stand-alone, anonymous urban housing estate in a field on the edge of the village. If planning permission was granted it would be the second such large-scale housing development approved for a small rural village in less than 3 years with the inevitable and irretrievable impact on the individual distinctiveness and unique character of the village and its community.

2.11 There is a serious fear in the community that medium density urban housing of a ubiquitous and monotonous mass as proposed in this application develops a model which will erode the character of Brixton as a rural village. This continuous erosion of what residents believe to be a healthy and happy place to live is starting to have a serious impact on the physiological well-being of the whole community.

3. Urban Sprawl on Plymouth fringe

3.1 This site is less than one mile from the edge of the Sherford New Town development and there is significant concern in the community about the danger of urban sprawl into rural Devon.

4. Policy - Development in the countryside

4.1 This proposed development does not meet the policy of the existing South Hams District Council LDF nor comply with the Policy for thriving towns and villages as identified in 'The Plymouth and South West Devon Joint Local Plan' (JLP) for 2014-2034 and it is contrary to the Policy for development in Brixton in the emerging Brixton Parish Neighbourhood Plan 2014- 2034.

4.2 This proposed development is outside the development policy boundary for Brixton village.

4.3 LDF policy CS1 makes it clear that any development outside the development boundary will be strictly controlled and can only be permitted where it responds to a demonstrable local need. **There is no identified need for further housing in Brixton. This application is essentially development in the countryside.** DPD policy DP15 sets out the criteria for development in the countryside: such development must require a rural location and support the needs of agriculture or meet the essential, small scale and exceptional local development needs of a settlement which cannot be met within development boundaries. This proposal conflicts with the objectives of LDF policy CS1, DPD policy DP15 and the NPPF, intended to protect the countryside from unnecessary development and takes further valuable agricultural

land for housing from the village environment and potentially destroys the character of Brixton as a rural village community.

4.4 In 'The Plymouth and South West Devon Joint Local Plan 2014-2034' (JLP) Brixton is listed as a sustainable village in the JLP's Thriving Towns and Villages policy. The JLP's strategic objective for sustainable villages is '*characterised by strong social networks and traditions. Development will have contributed to enhancing their character and local distinctiveness and helped provide a more balanced demographic profile and greater resilience to change for rural communities.*' **This application does not respect the existing networks and traditions of Brixton and does not respect the character and local distinctiveness of the village by attaching an urban housing mass of 64 houses in a field on the edge of this essentially rural village.** It does **not** enhance the character and local distinctiveness and does not provide a more balanced demographic profile and greater resilience to change it in fact has the opposite impact. Policy TTV31 identifies that LPAs will protect the special characteristics and role of the country side, it continues that housing development adjoining or very near to an existing settlement will only be supported where it meets essential, small scale local development need of the community and provides a sustainable solution. **This application is in clear conflict with this policy as there is no identified need for 64 additional houses in Brixton.** The 10 identified houses for Brixton in the JLP in the Thriving Towns and Villages policy has already been greatly surpassed.

4.5 JLP Para 5.154 '*The JLP does not identify sites for development in the villages as being the sustainable villages. Rather, an approach is taken which aims to enable development to come forward in these villages which reflects their sustainability, and which will respond to local needs. In these locations, it is clearly important to strike a balance so that development maintains or improves the viability of the villages whilst also being of an appropriate scale and meeting the needs of local people. It is important that any development in the Sustainable villages also respects the character of the villages and particularly any landscape designation such as the AONBs*'.

4.6 The National Planning Policy Framework (NPPF) identifies three dimensions for sustainable development (see para.7) and NPPF para. 8 states '*to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system*'. This proposed development in this application does not meet the criteria for sustainable development as required by the NPPF under the three dimensions identified.

4.7 For development to properly be regarded as sustainable all three roles need to be fulfilled, so that even if a proposed development may contribute an economic and social role, if such fails to perform in terms of the environmental role proposed development should be refused.

4.8 For example, is the site in question actually of the right type, in the right place and at the right time "to support growth and innovation"? The analysis set out in this document strongly suggests that the land is not of the right type, being open, undeveloped countryside, is not in the right place, as the site is not sustainably located, and is not at the right time in that there is no proven local need for housing of this scale.

4.9 The Applicant fails to address how the addition of up to 64 dwellings will positively contribute to performing a social role, and set against any purported benefits are the observations that the addition of some 64 new dwellings will simply serve to increase pressure on existing facilities to the detriment of the area, thus not fulfilling a positive social role as required by the NPPF, where emphasis is placed on **“accessible local services that reflect the community’s needs and support its health, social and cultural well-being.”**

4.10 This view was reiterated at the Feniton Appeals (APP/U1105/A/132191905) where the Inspector found that “substantially increasing the number of residences in a settlement without proportionate increases in the provision of local shops, infrastructure, employment opportunities and other local services risks eroding community cohesion” (para 87).

4.11 In addition, the Inspector took the view, in the context of para 9 of the NPPF which states that sustainable development involves seeking positive improvements in people’s quality of life, that constructing large amounts of housing on the premise that its occupiers would commute out, risked turning Feniton into a dormitory town. This was described by the Inspector as “a real danger” (para 85), and contrary to para 9 of the NPPF.

4.12 Furthermore, all the evidence suggests that the proposed development will be heavily car-dependent, in terms of access to employment, services and facilities, thus clearly conflicting with key principles of sustainable development.

4.13 With reference to the environmental role of sustainable development, the likely overall increase in car journeys resulting from the proposed development conflicts with the NPPF’s aim of minimising pollution, and building on previously undeveloped countryside also conflicts with core planning principles set out in para 17 of the NPPF, of conserving and enhancing the natural environment and encouraging the effective use of land by using land that has been previously developed. The NPPF Para 30 states that ‘encouragement should be given to solutions to reduce green gas emissions and reduce congestion. Para 32 emphasises the importance of safe and suitable access for all people’.

4.14 On balance, in terms of the three dimensions of sustainable development, it is clear that the limited benefits arising from the proposed development are significantly and demonstrably outweighed by the adverse impacts.

4.15 Development Policy 3 currently in draft in the emerging Neighbourhood Plan 2014- 2034 for Brixton Parish states that *‘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 should take into account topography, layout, building orientation, massing and landscaping (including any associated public realm) to minimise visual, ecological and social impact’*. This application does not meet this draft policy.

4.16 The emerging Neighbourhood Plan 2014-2034 is at a relatively advanced stage and consequently should be afforded reasonable weight in the consideration of this application.

4.17 This site has not been previously identified in any of the above policies or plans for housing development.

5. Infrastructure Issues

5.1 Drainage and surface water runoff. This is a sloping site where currently there are problems with surface water run off onto the main feeder road from Brixton to the A38 and Plympton which causes regular flooding at the bottom of Stamps Hill and in the adjacent house 'Ashford'. Filtration systems for a 1 in a 100 years event plus 30% for climate change have already (2015) proved to be ineffective in another development in Brixton as the weather pattern of frequent heavy downfalls of rain evidences that the 1 in a 100 years target is unrealistic and inadequate.

5.2 Sewage – No information has been provided to ensure that the current sewage system can cope with the increased capacity. There is evidence in the public domain provided by the Environment Agency that the sewage filtration plant below Brixton is not performing well and has insufficient capacity to manage the current demand. It shows that the following raw untreated sewage spills have occurred at Mudbank - 58 spills total 620 hours or spilling for 2 days (48 hours each month) into the River Yealm. This is occurring before the 34 houses for Phase 2a & 2b at Canes Orchard are built so the impact of the capacity from a further 64 houses to this water treatment plant must be taken very seriously. This level of contamination puts at risk the water quality in the river Yealm which is used for commercial oyster farming, for leisure and recreation and supports valuable wildlife habitats.

5.1 Access –

i) Introduction

The plan proposes vehicular and pedestrian access through Stamps Hill and Red Lion Hill which is a C4 road to Plympton and the A38. This is a busy road and carries a full range of traffic every day including cars, delivery vans, HGV's, school buses and farm vehicles. Pedestrians from the site via Stamps Hill will have cross this road more than once to reach to village as footways will be on different sides of the road and visibility is poor. There is no bus service to Stamps Hill and the nearest public transport (bus stop) is on the A379 and lies outside the recommended distance laid down by the planning authorities.

ii) Roads/ Highways

Brixton Parish Council supports the objection by Devon County Highways dated 29th June 2017 for Red Lion Hill and Stamps Hill and the proposed pedestrian access to the village.

The proposals are not safe for either traffic or pedestrians. Furthermore there are no proposals for parking for people who use the 29 adjoining allotments. Currently they park alongside the bungalows on Stamps Hill. The width restrictions proposed for Red Lion Hill will prevent all

large agricultural vehicles accessing the fields beyond the village. There is no other wide enough access to the surrounding lanes to the fields beyond Red Lion Hill suitable for local farmers to reach their fields with combine and forage harvesters. As the new town of Sherford is built the volume of traffic along this road will increase to access the A379 and the South Hams.

iii) Pedestrian Access to Brixton village

The site's fairly isolated location outside the northern edge of the village does not link up to any local facilities. There is no natural safe access for pedestrians to the village. The application outlines access via Stamps Hill and Red Lion Hill. There is no continuous footpath along this road and pedestrians have to cross the busy road which has poor visibility to access the footpath as it crosses from one side of the road to the other. Furthermore the wide junction to Cherry Tree Drive has also to be navigated to reach facilities and services which are at least 10 minutes walk from the site along this dangerous route through Stamps Hill and Red Lion Hill. See attached map - Location of footpaths along Red Lion Hill leading to Stamps Hill.

In the re-advertised planning application a new pedestrian link to the west is proposed through the field adjacent to this site and rear of Cherry Tree Drive to link with the village via the new development at Canes Orchard. This is described as a predominantly traffic free route. Canes Orchard could eventually have 120 houses on it site plus allotments which would mean traffic regularly using the main entrance into this estate and would not be traffic free in fact the roads are narrow and steep. Current residents of Phase 1 of Canes Orchards find the road dangerous for both drivers and pedestrians due to the design if the public highway. This proposed route is unsuitable, unsafe and further complicated access to the village and A379 for pedestrians

Alternative access to the village via the PROW would be via Cherry Tree Drive rejoining Red Lion Hill at a dangerous road junction or by way of the PROW down a precipitous flight of over 20 steps, which has handrails on both sides, through Tuscany's to the village via the steep footpath. Neither of these access proposals to the village is safe or manageable for people with limited mobility or using mobility vehicles, parents with small children or children in buggies or for people walking from the bus stop to the site with shopping etc. For people using the PROW the path between the houses is extremely narrow and borders the boundaries of two private houses impacting on their privacy and security particularly if street lighting is installed as outlined in the application.

It is unclear if access from the development to the adjoining field and the PROW has been established. At the time of the public meeting the developer admitted that they had not discussed public access through the field to Canes Orchard. It would appear that the granting of access over this land is unlikely; and a letter to South Hams District Council from Mr & Mrs Cane, the adjoining landowners, confirms that there has been no negotiation for footpath access through their fields to Canes Orchard. No infrastructure improvements are proposed to facilitate sustainable links from the site to existing village facilities. On a technicality the representative suggested that they would like the development to the existing public footpath in the neighbouring field. There are no details in the detailed application that propose such a link and the red line boundary for the application does not identify this desired pedestrian link across 3rd party land to the exiting footpath.

iv) Education

There is no evidence that the viability of the local school is dependant on the provision of further houses in Brixton. Currently the school is at capacity and from September 2017 it is over subscribed. The school has a strong family and community identity. Many children and families moving into Brixton will not be able to access local education provision. The nearest schools, which are also up to capacity, are at least 1.5 miles away from the site and parents will need transport to take them thus creating more traffic in this road. There is a limited and sometimes unreliable bus service along the A379 to other villages with schools. Ivybridge Community College is oversubscribed.

v) Medical Provision

The nearest Health Centre is at Yealmpton. It is not within convenient walking distance. The walking route of at least 40 minutes each way to Yealmpton to Brixton is via Silverbridge Way - a permissive path through the fields and along the pavement adjacent to the A379 at Yealmpton. It is not safe to walk along the A379 where there is no pavement. This route is only manageable by fit and well people to access services in Yealmpton.

6. Design

i) Loss of privacy for neighbours in Cherry Tree Drive and Stamps Hill

The re-advertisement has withdrawn the provision of the green gym. However it has not taken into account the need for privacy and a rural, peaceful outlook for the residents of Cherry Tree Drive. There is no buffer zone between Cherry Tree Drive and the houses proposed in the development. Further consideration has not been given to reconfiguration of the road layout to ensure that there is privacy for the residents of Cherry Tree Drive whose outlook will be ruined if this application is granted. The outline plan of the development shows **no public open amenity space** as the plan is essential suburban in design except for a residual space at the rear of the houses on Cherry Tree Drive which will impact negatively on these houses causing noise, disturbance, loss of privacy and security, and possible anti social behaviour.

The sectional drawings show that residents and neighbours privacy will be further compromised by the proposed heights of the houses immediately to the north of Cherry Tree Drive. **These roof lines are actually higher than the houses in Cherry Tree Drive.** Currently the residents of these houses have a view however their right to an outlook will be changed dramatically by this proposed plan. There is significant concern that the proximity, height and scale will result in an unacceptable level of intrusion on the overall amenity space of the existing residents

ii) Lack of Play Space and Amenity Space

No suitable play space is identified for younger children and it is estimated that 64 houses will generate between 60-80 young children. No suitable public amenity space is included in the plans. The linear strip of space is unsuitable for this purpose as it impacts negatively of the privacy and security of the residents of Cherry Tree Drive

iii) Affordable Homes in identifiable groupings

Serious concerns have been expressed about the plan creating small masses of affordable homes in the development which will be easily distinguished from other houses. Social housing needs to be fully integrated in the plan reflecting the character

and nature of the existing village and to avoid discrimination. Good design should reflect a tenure blind approach

iv) Lack of adequate parking

There is insufficient parking identified for 64 houses and no visitor or off street parking is identified. Evidence from recent new developments in the area shows that on street parking using the pavements outside houses for parking causes serious long term problems of congestion and hazards for other traffic, pedestrians and residents. This impacts on the quality of external space, streetscape and anti social behaviour

v) Design and Quality

South Hams District Council Development Policy 2010 states *'High quality and inclusive design will be a core aspect of promoting sustainable development in the South Hams. The LDF aims to make the best possible use of available land to meet housing needs, whilst achieving high standards of design and layout to the individual size and its surroundings'*

The site planning, infrastructure and layout does not provide sufficient 'breathing' spaces or a street scene which is friendly and welcoming with tree planting in the streets. The local play spaces are likely to be inaccessible to school age children due to the difficulty in accessing the village.

The plan and the design of the houses does not ensure that sufficient garage/parking and turning space for the numbers of cars and vehicular movements likely to be generated from this site is properly accommodated including lack of visitor provision.

The All Party Parliamentary Group for Excellence in the Built Environment (July 2016) states that *'we need to ensure that consumers are buying homes that are fit for purpose, are of enduring quality, perform to the requisite levels of maintenance cost and energy efficiency and give peace of mind, pride and enjoyment to those who occupy them'*.

The JLP consistently promotes that development should be of high quality design that enhances local distinctiveness. The proposal fails to demonstrate these important criteria and therefore does not accord with the JLP Strategic Objective SO11 or Policy DEV10.

vi) Energy Efficiency

Any new development should be very thermally efficient and incorporate renewable energy sources. There is no indication of renewable energy sources being proposed or other such sustainable design considerations.

7. Environment

i) Ecology and Wildlife

The site is essentially farmland, evidence of dormice, slow worms and bats has been found. The proposed plan makes no space for wildlife. There are no dark corridors for bats and the translocation of slow worms is not clear.

ii) Proximity to Composting Site and Community composting facility

The Community Composting site – a valuable green community asset - at Catson Green is required by Devon County Council as the planning authority to have 250 metre radius distance from any residential development. It is unclear in the application

that the site for the proposed new houses at Stamps Hill meets this legal planning requirement.

Conclusions.

1. The application is contrary to, and conflicts with a number of core principles and policies set out in the National Planning Policy Framework (NPPF).
2. The application is not in accordance with the South Hams Local Plan (SHLP) – LDF Dev 15. *‘Within the South Hams there is considerable pressure for new development in the countryside. Some proposals in the countryside can lead to unsustainable development which, individually and cumulatively, change its rural character. In order to protect the quality and character of the countryside it is essential to prevent inappropriate development.’*
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9. There is a serious fear in the community that medium density urban housing of a ubiquitous and monotonous mass as proposed in this application develops a model which will erode the character of Brixton as a rural village.

For the reasons set out above this application should be refused.