

**RECOMMENDATIONS OF Brixton Parish Council
ON PLANNING APPLICATION REFERENCE 1812/17/OPA**

To: Development.management@[southhams.gov.uk](mailto:Development.management@southhams.gov.uk)

Proposal: Outline application with all matters reserved for erection of circa 25no. age restricted (55+) bungalow / chalet bungalow dwellings, allotments, public open spaces and visitor car park

At: Proposed development site at Sx 550 523 Land at Venn Farm, Brixton

No comments to make

Support

Objection because

No objection

SUGGESTED POSSIBLE CONDITIONS or REASONS FOR REFUSAL:

In considering this outline application Brixton Parish Council conducted a site visit with the applicant's agent on 11th July attended by 22 members of the public to land at Venn Farm and held a Parish Council meeting to discuss the outline planning application on the 17th July 2017 attended by 44 members of the public.

Brixton Parish Council objects to this outline 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). – Sustainability and promoting healthy communities

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 for pedestrian and vehicular access to the site through Canes Orchard.

7. The site is not suitable for age restricted bungalows due to its topography, its isolation from the village and lack of public services.

8. 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.

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

10. There are serious and well-founded concerns in the local community that the continuing approval of applications for significant housing developments in Brixton village coupled with the new town of Sherford less than a mile away that Brixton will become an anonymous dormitory suburb with inadequate facilities resulting in an erosion of community identity and character.

2. Irrevocable destruction of the identity and character of Brixton as a village and as a parish community

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, continuity and character and for its residents an appreciation of Brixton as a special place with integrity and stability.

2.2 No other development in the village over the years has concentrated so many houses in one particular area. The national census data evidences that from 2008 – 2011 the housing stock in Brixton Parish increased by 28% with the construction of houses at Carroll Island at Staddiscombe. Since 2011 there was further increase of 16% in the housing stock in the parish and of that increase 25% was in Brixton village. Since 2014 the developments at Venn Farm, known as Canes Orchard, total 44 houses with full planning permission and 46 dwellings with outline planning permission creating a total of 90 new houses on this site to date. A planning application has been made for 64 houses at Stamps Hill and a further 25 bungalows at Venn Farm (still to be determined) Thus the number of dwellings in these applications increases the figure to a total increase of 179 which, if approved, has the accumulative effect of a 45% increase on the existing number of houses within Brixton village in 3 years.

2.3 This magnitude of the increase in housing at Canes Orchard/Venn Farm and Stamps Hill within a short time scale will erode the individual distinctiveness, unique character and identity of the village and its community. **This continuous attrition 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.**

2.4 This application relates to land which is outside the village development boundary. It is part of the agricultural heritage and landscape of the village and parish and is being used for arable farming.

2.5 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.

2.6 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 115 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 a total of 211 houses have been built, have planning permission or are in the process of obtaining planning permission the need for this amount of housing has already been met and exceeded in the parish.

2.7 Brixton village has a very limited range of local facilities. No new facilities have been provided or are planned in Brixton as a result of this excessive house building. In fact the services offered have reduced with a part time Post Office which opens mornings only Mondays, Tuesdays, Wednesdays & Fridays and Thursday afternoons. There is no Saturday service. There is an unreliable bus service during the week and no Sunday service.

2.8 A Housing Needs Survey conducted in April 2016 by the Brixton Neighbourhood Plan Group on behalf of South Hams District Council did not identify the need for specialist housing for the over 55's. It identified the need for 11 affordable homes for younger people to maintain family and employment links with the Brixton community. Appendix 1

2.9 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.

2.10 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, and increased journeys by private car, social inclusion and over-development of the settlement.

2.11 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. This process should not be usurped by speculative and opportunistic development proposals seeking to take advantage of the 5 year housing land supply situation.

2.12 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.

2.13 This application is a quasi-urban development in the countryside linked opportunistically to the Canes Orchard development.

3. Policy - Development in the countryside

3.1 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.

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

3.3 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 and no identified need for age restricted housing.** 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. It takes further valuable agricultural land for housing from the village environment and potentially destroys the character of Brixton as a rural village community.

3.4 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 exclusive housing mass for people over 55 in a field at the top of a hill and 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 age restricted accommodation in the village and this is contrary to the sense of community and inclusiveness experienced living in Brixton. The 10 identified houses for Brixton in the JLP in the Thriving Towns and Villages policy has already been greatly surpassed.

3.5 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.'*

3.6 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.

3.7 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.

3.8 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.

3.9 The Applicant fails to address how the addition of up to 25 age restricted dwellings will positively contribute to performing a social role, and set against any purported benefits are the observations that the addition of some 25 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.”

3.10 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).

3.11 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.

3.12 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.

3.13 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’.

3.14 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.

3.15 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.

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

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

4. 5 Year Housing Land Supply

4.1 It is very difficult for Brixton Parish Council in making an objection to this application to refer the current 5 year housing land supply (HLS) as South Hams District Council has been apparently unable to provide any up to date information. Whilst it is understood that SHDC is, at the present time unable to demonstrate a 5 year HLS, its Housing Background Paper dated Feb 2017 produced for the JLP states that there will be a 5 year HLS by the end of March 2018 (p.57 para 8.13).

4.2 The recent Supreme Court judgement (10 May 2107) on NPPF paras 14 and 49 took the view that despite an absence of a 5 year land supply, existing policies restricting development must still be afforded due weight in the determination of planning applications. Consequently South Hams LDF Policy DEV15 is still an important material consideration. It states "Within the South Hams there is considerable pressure for new development in the country side. 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". This application clearly conflicts with this policy.

4.3. Furthermore, in this context LDF Policy CS1 should be regarded as a policy protective of the open countryside, not as a policy restrictive of housing. Despite the 5 year HLS, Policy CS1 should not therefore be regarded as out-of-date.

5. Urban Sprawl on Plymouth fringe – proximity to the new town of Sherford

5.1 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.

5.2 As a parish, in addition to the 45% increase in house building in the village itself, the new town of Sherford will bring just over 5,000 new homes into the parish area. Considering the geography of the parish and the impact of these developments there are serious concerns regarding the long term future of the character of Brixton as a rural parish; and its capacity to absorb any more house building without existing

infrastructure being subject to serious volume pressures with consequential adverse impacts on the amenity and well-being of the community. See Appendix 2 Coloured map showing developments in Brixton Parish

5.3 The Sherford Consortium has applied for a variation to the original planning application where there is a risk of further ubiquitous mass housing being built in the parish.

6. Suitability of the site

6.1 This site is not suitable for this proposed age restricted development as it is at the end of a cul-de-sac on the top field which is accessed by a considerable slope with a gradient of 1 in 15.4. The bungalows are lifetime homes. The people who will live in them will become increasingly infirmed as they get older. In these circumstances there is no easy access to the limited village facilities i.e. the shop, Post Office and bus service. Access will be either walking or driving up through Orchard Road a narrow and shared space for vehicles and pedestrians. The site is at least 400 meters to the bus stop. Quoting distance is irrelevant for older people who may find walking any distance difficult and tiring. The location is isolated for people with limited mobility or who are housebound or have other disabilities e.g. impaired vision. As the development is at the end of a cul-de-sac there is no passing traffic or children to look out onto for housebound people resulting in isolation and loneliness for the residents.

6.2 This site is unsuitable for the proposal as it will create a ghetto of older people in an isolated part of the village; the location is not conducive for social and community cohesion for the future residents on this development.

6.3 In the NPPF 'Promoting Health Communities' Para 8 states *'The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. Planning policies and decisions, in turn, should aim to achieve places which promote:*

- *opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity*
- *safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion*
- *safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas'.*

Para 70 states 'To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- *plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments*

- *guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs*
- *ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community*
- *ensure an integrated approach to considering the location of housing, economic uses and community facilities and services'*

The application for 25 age restricted bungalows on Canes Orchard does not meet these planning requirements.

6.3 This site and the increase in the number of dwellings exceeds the original RA12 (Rural Allocation) boundary and allocation defined by South Hams District Council and exceeds the boundaries of the developer's Master Plan for Brixton agreed in 2012.

6.4 Illustrative numbers on the outline application - an undertaking is required that the illustrative figures of numbers of bungalows for this site must not be varied or increased as part of any reserved matters application from the applicant if the outline application is approved.

7. Numbers of houses

7.1 The planning statement reports that there are 810 dwellings in Brixton village. This is incorrect and misleading as there are approximately 800 houses in Brixton Parish with only approximately 400 houses in Brixton village. The remainder include a major settlement at Carroll Island, the smaller hamlets of Spriddlestone, Combe, Brixton Torr and Chittleburn and other isolated houses and farms.

7.2 Incremental increase in numbers

The original developer's master plan for Venn Farm site (2011) was for 50 houses. This increased to 61 when planning applications for Phase 2a & 2b were approved. Outline planning consent for Phase 3 for circa 27 houses has been granted for this site and with this proposed application increases the number to 115 in 2 years. The allocation for new housing in Brixton has therefore been met and indeed exceeded by a substantial number. Assurance is needed that if outline planning permission is granted that the figure of 25 will not be exceeded to increase the density in any later planning application and/or the number increased as evidence 'for economic reasons'.

8. Open Space and Allotments

8.1. Open Space has been allocated on the site plan this open space is away from the rest of housing on the Canes Orchard site. Phases 1-3 have inadequate open space. Children playing in this open space will need to be supervised due to its isolation away from the main housing development. Its remoteness could encourage anti social behaviour in an area close to housing for vulnerable older people.

8.2 8 Allotments have also been included in this application. From the Neighbourhood Plan consultation (2016-17) there is no evidence of any further need/ demand for allotments in Brixton as there are already 29 in Stamps Hill. Allotments will also attract additional car users to this site via Orchard Way.

9. Infrastructure Issues

9.1 Drainage and surface water run off. As arable land these fields are known to have poor drainage with considerable surface water accumulating in periods of heavy rain. The risk of problems identified by Brixton Parish Council and residents relating to drains and surface water run off on from Canes Orchard were ignored by planners and builders in the applications for Phases 1, 2a & 2b and 3 subsequently have been dealt with inadequately. Resulting flooding and problems with both surface water run-off and blocked domestic drains are already being experienced by residents of Phase 1, in Bramley Close and Orchard Road. This is before the loading is increased by Phase 2a currently being constructed and Phases 2b and 3 which are still to be built. (Temporary fixes of earth trenches by the developer are unsustainable).

This phase with 25 bungalows will further lead to the encroachment of water onto to the Phase 1 and 3 sites and increase the risk of further local flooding. Based on this information serious concerns remain for residents of Canes Orchard and the Parish Council about the continuing risk of flooding from drains and surface water on and from this site.

Existing infiltration solutions for a 1 in 100 year's event plus 30% for climate change have already proved to be ineffective in Phase 1 in the past 2 years. As the weather pattern of frequent heavy downfalls of rain since 2015 evidences that the 1 in a 100 years target is unrealistic and inadequate.

9.2 Sewage – No information has been provided to demonstrate that the current sewage capacity can cope with the increased flows.

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 (spilldata 15/16).

This is occurring before the 67 houses for Phases 2a, 2b & 3 at Canes Orchard are built so the impact of the increased flow of sewage from a further 64 plus 25? houses to Brixton sewage treatment works must be taken very seriously. Indeed SWW themselves made this observation in a letter to Brixton Parish Council dated 3rd June 2013. Increased levels 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.

Any increase in contamination is also contrary to obligations under the Water Framework Objective which contains a clear non-deterioration clause.

For information, the most recent data on water quality from shellfish samples (June/July 2017) already shows that the oyster fishery is under serious threat of closure, there has been a general decline in water quality since the connection of phase one of Canes Orchard to the sewerage network.

Brixton Parish Council requests that evidence is provided from SWW to the Development Management Committee to clarify that the current sewage plant at Mudbank has sufficient capacity for this further increase in number of houses in Brixton and to also protect the River Yealm from pollution.

The condition placed on recently approved application for 29 houses is not robust enough to have any effect as SHDC are not the enforcement body for such matters a meeting of interested parties should take place to discuss these issues.

SHDC planners should take note of the recent EA press releases showing that SWW is by far the poorest performing water company on environmental grounds any assurances from this company should be treated with extreme caution as they are clearly not impartial but rather SWW have clear pecuniary interest in additional water company charges for new housing.

9.3 Roads in Canes Orchard – There are serious road safety issues for residents of Phase 1 of Canes Orchard due to the cul-de-sac road layout of Orchard Road which is restrictive in that the narrowness of the road and pavements forces people to walk in the road when cars are parked. Vehicles larger than a Tesco's delivery van have difficulty in manoeuvring and turning in the current configuration of roads and pavements. Given the tightness of the bend as well as narrowness of the road - there is no adequate turning area for delivery vans or indeed any vehicle. The families living in Canes Orchard have significant concerns about traffic movement, poor parking arrangements and inadequate turning head. These safety concerns will be exacerbated by the further increase in traffic from Phase 2a, 2b, Phase 3 and if this application is approved is approved. Assurance is needed that all emergency vehicles can safely access the site.

The Manual for Streets – Department of Transport Guidance para 5.7 describes designing streets as social spaces *'The public realm should be designed to encourage the activities intended to take place within it. High-quality open space is a key component of successful neighbourhoods. Para 5.91 the space between the front of the building and the carriageway, footway or other public space needs to be carefully managed as it marks the transition from the public to the private realm. Continuous building lines are preferred as they provide definition to, and enclosure of, the public realm. They also make navigation by blind and partially-sighted people easier'*.6.1.1 *Street design should be inclusive. Inclusive design means providing for all people regardless of age or ability. There is a general duty for public authorities to promote equality under the Disability Discrimination Act 2005.1There is also a specific obligation for those who design, manage and maintain buildings and public spaces to ensure that disabled people play a full part in benefiting from, and shaping, an inclusive built environment.*6.1.2 *Poor design can exacerbate the problems'*

As this application for development is for older people, the likelihood of them having increasing long term mobility difficulties, sight and hearing impairment and other disabilities throughout their lives, safe access through Orchard Road with its narrow shared surface and current limitations cannot be guaranteed alongside other road users.

More than 70% of over 70 year olds have some form of hearing loss, 14% of people over 65 have sight loss which affects their day to day living; this increases to 35% for those aged over 75 and 50% for those over 90 Source 'Later life in the United Kingdom July 2017'

The width of Orchard Road was raised in the planning application for Phase 3 of Canes Orchard when it was found that the road did not meet the required widths by Devon County Highways. The road has now been designated for joint pedestrian and vehicle use. This is of great concern to residents as children can play in the road where a minimum of 250 traffic movements may take place during the day. This does not include people accessing the proposed allotments by car.

9.4 Access to Health Care/Social Care and Medical Provision

There are no medical services/ provision in Brixton village. The health and social care needs of the residents of this development will not be met in Brixton village. This development will not be benefitting the local economy as there are no medical or social care facilities in Brixton. Currently residents travel to get the best value for their money, their time and where services are safely and easily accessible.

Access to all medical provision from Brixton is highly dependant on travel by car. The nearest Health Centre is at Yealmpton which can only be safely accessed by bus, taxi or car. There is also a dentist and optician at Yealmpton. Silverbridge Way, a permissive footpath running parallel to the A379, is 1.8 miles from the village and can be walked by fit and well people to access the Medical Centre. This path is very steep in places. Other GP Practices used by current residents of Brixton are in Plymstock 3 miles away these can only be accessed by public transport, taxi or car by older people. This location provides the services they need at one location i.e. GP, dentist, optician, pharmacy, and choice of retail for weekly shopping. As the bus service is unreliable more older people use taxis to access these services in Plymstock as is the most cost effective and accessible choice of location.

Derriford Hospital is a round trip of 22 miles by car from the site and if travelling by bus would require a change in Plymouth City Centre and Kingsbridge Hospital used by patients of the Yealm Medical Centre is a round trip of 28miles. There is an unreliable hourly bus service during the week and no Sunday service. Access to either hospital is dependant on travel by car for patients, carers and family visitors. Other medical services provided for people with disabilities are located in Plymouth and again would involve a change of bus in the City Centre to access services at Mount Gould and other health and social care provision around the City.

Given the limited and unreliable public transport facilities for Brixton the residents of the over 55's development will need to be car drivers or car dependent and be able to continue to drive in later life. Many elderly people with complex health conditions the prevalence of which increase in later life, i.e. dementia, heart failure breathing conditions etc. have to give up driving. This site is very isolated, at the top of a hill with a significant gradient and is at least 500 meters walk to the main road and another further walk to the bus stop or Post Office. People living on this site will be remote and socially cut off from the community.

The application does not identify what the need of the residents of this development would be. For example, there is no attempt made to calculate or project what percentages of residents of the new development would be likely to be still working and travelling to work, what percentage would use public transport, cycle or walk. It is simply asserted residents could access a range of services and facilities lying within given distance of the site entrance. 400 metres is most commonly cited as a standard

distance for walking to public transport, whereas an alternative accessibility methodology, PTAL, used in London, has a cut-off of 640m for walking to a bus stop, and 960 for rail, beyond which only insignificant numbers would be prepared to walk. Even though such distance-decay is implicit in The Institution of Highways and Transportation -Guidance for Providing Journeys on Foot Guidance (distinguishing between “desirable”, “acceptable” and “preferred maximum”), there is no distance-decay effect taken into account.

Outside large towns and cities the standard approach to measuring accessibility is to use data on stops and services to produce different gradations of access by public transport, often defined as access to the nearest significant employment and shopping services.

By way of illustration, Transport for Greater Manchester uses the Greater Manchester Accessibility Levels (GMAL), which is included in “Transport for Sustainable Communities: a guide for Developers” dated March 2013. It states at page 13; “As a rule of thumb, 400 metres (about 5 minutes’ walk) is often taken as the distance people are prepared to walk to a bus stop. In general, people are prepared to walk further to rail or Metrolink services: up to 800 metres or more. In terms of assessing the accessibility of a new development, however, distance criteria are an oversimplification because they take no account of factors such as where services go to, how frequent or reliable they are or whether they are likely to endure in the future.” When set in this context, the proposed development site lies in a “sustainable location” is unsupported by any reliable evidence.

The Institution of Highways and Transportation -Guidance for Providing Journeys on Foot states *‘Planning for pedestrians should be a specific and positive part of the development planning process. It should not be treated as something that can be fitted in once decisions about road layouts have been made.’* In this case the road layout and its width has already been determined and is not suitable for pedestrians with increasing age related disabilities.

9.5 Public Right of Way (PROW)

Currently there is a PROW across the field from Cherry Tree Drive to Catson Green. This not referred to in the application and there is no indication of its location should it need to be moved on the plans. There is no comment from Devon County Council PROW Officer on the footpath.

10. Traffic Statement 14/3/2017

10.1 Traffic Flow

The evidence in the Traffic Statement concerning traffic flow through the village is out of date. The survey took place in June 2011. In the intervening 6 years new housing has been built in Brixton, Yealmpton (50), Ermington and Modbury resulting in increase in traffic along the A379.

10.2 An up to date report on traffic flow through Brixton village and traffic generation from Canes Orchard needs to be available as evidence to the Development Management Committee.

10.3 Traffic Generation –

In the Transport Statement (14/3/2017) the traffic generation and flows to and from the site are underestimated. In total with 25 bungalows there will be vehicles from 121 houses (90 new houses, 4 barns, Venn Farm House and The Wheelwrights) accessing and exiting from this site. This access is directly onto the busy A379 the main commuter road into Plymouth from the South Hams. It is not 'lightly trafficed' as described in the Transport Statement. The mini roundabout is not a 'traffic calming devise' it provides access to Steer Point Road. Although the bungalows are age restricted it is likely that most residents will continue to work, particularly given the very recent announcement that the retirement age be raised to 68. Up to date information needs to be available to provide an informed impact assessment of the traffic flow from 96 dwellings onto the A379.

11 Design and Quality

11.1 The design of these bungalows must ensure that sufficient garage/parking, visitor parking and turning space for the numbers of cars and vehicular movements likely to be generated from this site is properly accommodated and safe. The design of Phase 1, 2 & 3 of Canes Orchard does not demonstrate an understanding of the character of Brixton village, with its suburban design and poor detailing of the public realm.

11.2 Loss of privacy for neighbours in Cherry Tree Drive - there is no buffer zone between Cherry Tree Drive and the houses proposed in the development. Further consideration must given to reconfiguration of the road layout to ensure that there is privacy and their right to an outlook for the residents of Cherry Tree Drive whose outlook will be ruined if this application is granted.

11.3The 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'. This homes need to be fit for purpose for the over 55's and suitable to meet their long term health and other needs in later life.

12. Energy Efficiency

12.1 Any new housing should be very thermally efficient and incorporate renewable energy sources.

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). - Sustainably and promoting healthy communities.

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. The site is not suitable for age restricted bungalows due to its topography, its isolation from the village and public services.

8. 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.

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

10. 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.

Appendix A

Executive Summary and Conclusion of Brixton Parish Housing Needs Survey dated April 2016

1 Executive Summary

Principal Conclusions

The survey identified a need for 11 affordable homes within the next 5 years.

Key findings

A total of 25 households stated they wanted or needed to move home within the next 5 years.

Affordability

- The survey found 7 households in housing need who could not afford to buy in the open market.
- 4 additional replies were received by households on Devon Home Choice who had not completed the survey but were eligible for affordable housing in the village.

Tenure

- 10 of the households in housing need qualified for affordable rent, 1 may be able to afford a shared ownership property.

Size of Property Required

- 6 x 1 or 2 bedroom properties for singles or couples
- 3 x 2 bedroom properties for families
- 2 x 3 bedroom properties for families

Other Findings

- 800 surveys were delivered and 233 survey forms were returned. The response rate was 29%. This is a good response rate, with the average response being 25%.
- 47% of those who answered the question said they would be in favour of a small development of affordable housing for local people. 25% were against any development and 28% stated they may be in favour depending on the circumstances.

9. Conclusion - Future Housing Need for Brixton

Overall, it must be remembered that this Housing Needs Survey represents a snapshot in time. Personal circumstances are constantly evolving. Any provision of housing, would, by necessity, need to take account of this. However, given the level of response to the survey, and in spite of the potential for circumstances to change, the Parish Council can feel confident in the results of this survey. The survey has identified a need in the near future for 11 units of affordable housing and a further 18 units of open market housing.

As the needs of households are constantly evolving the level and mix of need in this report should be taken as a guide. In particular it may be appropriate to vary the mix of sizes provided. This report remains appropriate evidence of need for up to five years. However if there is a significant development of affordable housing in the parish which is subject a local connection requirement and substantially meets the need identified in the report it will normally be necessary to re-survey the parish before any further development to address local needs is considered.