Comment by Bridestowe Parish Council to WDBC on Planning Application: 3828/24/FUL for Development Site at Town Meadow, Bridestowe.

Bridestowe Parish Council object to the planning application 3828/24/FUL. The decision is made upon there being no fundamental changes to the application details since the original (refused) application 2861/23/FUL was submitted.

A recent unsigned letter from Leander Developments to the parish council and which was also sent on restricted distribution to a small number of Bridestowe residents suggests that opposition to the proposed development is a direct consequence of a change averse population.

Nothing could be further from the truth. Had previous attempts at engagement been more than a nod to community involvement, the developers would have discovered that concerns over this proposal are borne out of real life experience and observations of problems that can arise when the project plan is flawed, and its owner lacks the willingness to explore a solution acceptable to all parties.

In the same letter, the author claims that refusal of previous applications have been on "spurious grounds". Given that refusal followed a lengthy and detailed process of appeal to the inspectorate for the Secretary of State, it is a puzzling conclusion but perhaps explains why so much time and effort has now to be expended seven years after the initial outline planning permission was granted, on a yet another application whose similarity to previous applications is striking.

The theme of our comments on this application share similarities with those made on previous applications, and concentrate on specific issues and are reproduced further down.

In his report, Neil Pope (Inspector appointed by the Secretary of State APP/Q1153/W/22/3293078) wrote the following:

"24. In addition to the above, the proposed detached dwellings would have sizeable 'footprints' and all of these buildings would be single storey in height. Having such a concentration of bungalows on this site, some of which (plots 3, 4, 10, 11 & 14) would be set back from the estate road and tucked into the corners of the site, would be at odds with the pleasing attributes of Bridestowe. This would also sit uncomfortably with the VDS which, amongst other things, cautions against large areas of homogenous new development.

25.The absence of natural stone on some elevations of any of the buildings and the paucity of chimneys also fails to adequately reflect local distinctiveness. Other than the terraced houses and natural slate roofs, there is little else about the proposed street scenes to indicate that the proposed development would comprise a well-designed place that is influenced by and would positively influence the context of this site.

26. The six proposed terraced houses by virtue of their size, height and type would be very different to the bungalows. To an extent, I agree with the LPA that these houses would be clearly distinguishable as affordable dwellings and together with their parking arrangements would not be sensitively integrated into the development as a whole. This further detracts from the quality of the overall design of this proposed housing scheme. Although the style of the proposed

houses would be similar to some open market housing at Town Meadow, they would not be 'read' together or appear in the same street scene."

He also wrote:

"32. The proposed layout and single storey nature of so many of the proposed buildings would be akin to the type of suburban housing estates that were 'bolted on' to some villages in the past and which detract from the distinctiveness and integrity of settlements. The appeal scheme would be an inappropriate response to the local context and would detract from the quality of the local environment.

33. I conclude on the first main issue that the proposed development would not comprise good design and would have an adverse effect upon the character and appearance of the area. There would be conflict with the provisions of LP policies DEV10, DEV20, DEV28, NP policy H5, the VDS and the provisions of the Framework that are aimed at achieving well-designed places. The proposal would also be at odds with the aims and objectives of the NDG. This harm weighs heavily against granting permission and I consider that, on its own, this would be sufficient grounds to justify withholding permission."

Since the proposed density of the housing was increased with a subsequent application, some plots are numbered differently from those referenced above. Some design detail has also changed. However, the council believe that the comments remain largely valid.

Additionally, the Parish Council is not satisfied that the flooding concerns have been adequately investigated. It is the opinion of the council, and of Bridestowe's residents, that any report used for evidence should be from an independent professional surveyor and not the developer themselves. Local knowledge from long term residents should play an important role in the consideration of this issue.

The Parish Council believes that there are genuine unheard concerns regarding access to the site that will cause significant disruption not only during the development but forever more. The concerns are disturbance, noise, unsightliness and most importantly public safety.

The Parish Council feels that it is necessary to highlight once again that there was no public consultation or engagement prior to this application being submitted. Although the applicant states that they knocked on the doors of residents this is simply not true.

Views of the Parish Council, expressed in an earlier submission remain relevant and appear below.

Bridestowe Parish Council strongly believes that it is of crucial importance that any proposed housing development within Bridestowe village should create a positive legacy for future generations. It has significant concerns that this proposed development on a green field site clearly fails to do so.

The council's response closely reflects the views expressed at the recent public meeting in Bridestowe, attended by 64 parishioners, believed to be the largest attendance at a public meeting in over 40 years in the parish. The strength of local opinion, that these proposals are grossly inappropriate was reflected by the fact that not one of the attendees spoke in favour of

the proposals. These proposals were strongly and passionately rejected by the parishioners present at the meeting and also informally by others in many conversations within the village.

The council is very sceptical about the thoroughness of the public consultation commissioned by the developer.

Our responses in the seven sections that follow, references the Joint Local Plan, (JLP), Bridestowe and Sourton Neighbourhood Plan (NP) and Neil Pope's Appeal decision of 03/04/2023.

1. Local context and quality of design

i) Impact of the Development

NP Policy H5 states:

Applications for new development will be supported provided they meet the following criteria:

f) It protects individuals and property from overlooking and loss of privacy, overshadowing and overbearing impacts, and unreasonable noise and disturbance

JLP DEV 10:

'Housing developments should be designed to be integrated with the adjacent developments and not appear to be an unrelated addition to the rest of the town, village and neighbourhood.

The addition of so many dwellings (16 single storey) to an existing modern development would result in an estate comprising 52 houses, which would be overbearing and disproportionate in size and housing mix in a village with the size and character of Bridestowe.

Neil Pope, the Inspector appointed to give judgement on the appeal decision on the previous scheme commented that:

'the proposed layout and single storey nature of so many of the proposed buildings would be akin to the type of suburban housing estates that were 'bolted on' to some villages in the past and which detract from the distinctiveness and integrity of settlements. The appeal scheme would be an inappropriate response to the local context and would detract from the quality of the local environment."

This criticism remains valid as regards this scheme.

ii) Density causing cramping

The original scheme proposed 24 units; this has been increased to 28. The increase in numbers of houses raises immediate concern that to achieve the total there must be a degree

of cramping and attendant reduction in quality as well as attendant risk of noise nuisance from closely spaced properties. Cramping is evident when comparing the proposed layout in the first proposal for this site with the current proposal.

iii) Lack of diversity failing to deliver locally distinctive design

The inappropriate number of bungalows (16) does not meet the requirements of JLP SO9.7 by "Protecting and enhancing the local distinctiveness and the historic character of the smaller towns and key villages, nor of JLP DEV 20.4 by "delivering locally distinctive design."

Neil Pope cautioned against creating a large area of 'homogenous new development' (para24).

Also, it is clear there has been no reference to the Village Design Statement. NP Appendix VI

2. Affordable housing

JLP SPT 2.4 states:

Have a good balance of housing types and tenures to support a range of household sizes, ages and incomes to meet identified housing needs

The PC recognises the need for affordable housing in the community however the application proposes that the affordable housing will comprise solely of two-bedroom dwellings. With an increase in the number of growing families, there is a recognised need for 3 bedroomed homes.

So this development fails to meet the requirement that it should provide

"A mix of housing sizes, types and tenure appropriate to the area and as supported by local housing evidence should be provided, to ensure that there is a range of housing, broadening choice and meeting specialist needs for existing and future residents." JLP Dev 8.1.

The PC is committed to encouraging young families to remain in the village, rather than looking for a larger dwelling elsewhere, as their children grow older. It concurs with the JLP's opinion,

"Given the age profile of the 'Thriving Towns and Villages, 'it will also be important to maintain a strong core of young working age families that can provide solid foundations from which to build our future economic growth and secure our rural services and facilities." JLP (6.32 p258)

The PC welcomes WDBC's reassessment of housing need as the 2016 HNS can no longer be considered an accurate reflection of current need.

JLP DEV 10.3:

As the Joint Local Plan states, 'Affordable housing should be indistinguishable from other homes on the site, reflecting the type of housing on the development as a whole'. JLP DEV 10.3

The affordable housing is to be confined to one area within the development and will be clearly distinguishable from the open market dwellings. An integrated solution would be a far better outcome, creating a more acceptably balanced social mix across the whole development. (NP Table on p34. 1(a) and 1(b)).

The Council is concerned too that in the current economic climate should the development fail the financial viability test, developers may renege on their promise to provide all nine affordable units.

3. Access

JLP SO9.5 states:

To enable the development of new homes, jobs and community infrastructure sufficient to meet the local needs of the sustainable villages identified in the area and the village networks they serve. This will be achieved through:

'Responding positively to rural travel patterns through innovation and investment.SO9.5. JLP

The NP H7 states:

All new development should:

- b) demonstrate a safe and suitable access to the site for all people and not cause a significantly adverse impact on the local road network that cannot be managed or mitigated; and
- c) where feasible, discourage on street parking. NP Policy H7 Transport and Accessibility.

Increased congestion in the village persists. Car ownership is essential in a rural community with poor public transport. With the absence of public transport from and to Bridestowe village, travel patterns will continue to revolve around cars for the foreseeable future. There is already intense on-street parking pressure on roads within the Town Meadow estate, resulting in a safety risk and poor residential amenity. Access to the new phase involves 90- degree corners creating a chicane-like effect with single passing.

Inevitably the proposed 28 homes will only exacerbate the problem. The number of vehicles in use within the development will, in all likelihood exceed the allowance within the plan and create an unacceptable burden on the infrastructure and residents.

The single point of access for a scheme of 28 houses will lead to greater congestion, without the added burden of home delivery services, utility vehicles, etc.

The absence of pavements in the new development is a concern. In the Planning Statement the National Planning Policy Guidance is cited recognising the need 'for safe and suitable access to the site and to create safe and secure layouts which minimise conflicts between traffic and cyclists and pedestrians' NPPG para 108 and 110. The predicted 7 primary children and 4 secondary children will have no dedicated pathway despite the claim of provision of 'footpath connectivity.'

4. Flooding

NP H8 states:

Development should be located away from areas at risk of flooding, and flood measures are included in the development to ensure that flood risk in surrounding areas is not increased in accordance with existing policies. NP H8

There is extensive local knowledge regarding the poor drainage of the development site which suffers from localised flooding. With two small rivers, Crandford Brook and the River Lew running though the village the threat of flooding has always been taken seriously. The village, in the foothills of Dartmoor, is prone to flash flooding off the moor and these rivers can very rapidly become torrents, as the significant flooding history of the village bears testament.

Neil Pope listed the increased risk of flooding as his third main issue in his report.

5. Surface water drainage/ sewerage

The large attenuation pond designed to accommodate run off is a source of concern. It will require considerable continuing maintenance to keep it from

silting up or becoming overgrown with invasive species such as parrot feather. It is proposed that the pond 'will be retained under the private ownership of the appointed management company who will be responsible for its future operation and maintenance in perpetuity'. The PC is concerned that the cost is likely to be considerable and will be borne by residents. It could

be an unreasonable burden on all residents, but more so on those living in the affordable homes.

Parishioners are concerned that children will need to be protected from what they consider to be a potential drowning hazard.

JLP p302

'Discharges of surface water flows to the combined sewer should be avoided as they can increase the risk of pollution of the water environment through releases from combined sewer overflows which in turn can have impacts on the water quality, especially bathing waters.

In 2022, this sewer storm overflow spilled 165 times for a total of 2101.71 hours, discharging into the River Lew. (Ref: The Rivers Trust)

There have been problems with Bridestowe's main sewer for many years with 'back ups' and the added burden of an extra 28 properties is going to put greater pressure on what is generally deemed an inadequate provision.

6. Impact on a designated heritage asset

NP EH6 states:

In accordance with national policy the potential impact of the development proposal on a heritage asset and its setting should be fully assessed. The relevant historic environment record should have been consulted as a minimum requirement. Due regard should be given to the list of non designated heritage assets which has been compiled by the communities.

Neil Pope draws attention to the fact that the site lies within the setting of a C15th century Grade II listed church and suggests that English Heritage might wish to express a view on the proposals.

7. Method of Construction Statement

The PC was appalled that Leander Developments have decided to route all construction traffic through the village, reneging on their promise to construct a temporary access route off the old A30.

The plan is to use vehicles of only up to 7.5t. Due to the amount of construction materials required, this would result in an extremely high number of vehicle movements and the logistical problems posed by having to bring articulated vehicles carrying roof trusses through the village would be inconceivable.

The Council would like to make clear that Town Meadow was included as a site for housing development by the Neighbourhood Plan solely because outline permission had already been granted; it could not be excluded. The local referendum on desirable sites for development, part of the extensive consultation for the Plan, put this site at the bottom of the list in terms of desirability.

Bridestowe Parish Council would be grateful if WDBC council would take their comments into consideration when appraising this application. It believes these reflect accurately the wishes of the community. We would welcome the opportunity to meet with the appropriate planning officer on site to illustrate our points at first hand.