



PLANNING APPLICATION: 3122/21/VAR

DESCRIPTION: Application for variation of condition 7 of outline application 28/1560/15/O (appeal ref: APP/K1128/W/16/3156062) to allow for **revised** dwelling design and **layout**

ADDRESS: Land at Garden Mill Derby Road Kingsbridge

6th December 2021

LETTER FROM THE SOUTH HAMS SOCIETY TO THE SHDC TO REQUEST AN EXPLANATION OF WHETHER THE LOCAL PLANNING AUTHORITY HAS MADE AN ERROR IN VALIDATING A SECTION 73 PLANNING APPLICATION.

The South Hams Society interest

For the last 60 years, the South Hams Society has been stimulating public interest and care for the beauty, history and character of the South Hams. We encourage high standards of planning and architecture that respect the character of the area. We aim to secure the protection and improvement of the landscape, features of historic interest and public amenity and to promote the conservation of the South Hams as a living, working environment. We take the South Devon Area of Outstanding Natural Beauty very seriously and work hard to increase people's knowledge and appreciation of our precious environment.

The Section 73 Planning Application.

Blakesley Estates (Kingsbridge) Ltd have submitted a section 73 planning application giving a description of the proposal in section 4 of the application form as:

*'This Section 73 application has been submitted principally to vary Condition 7 of the existing outline planning permission. The intention is that, subject to the LPA's approval, the Section 73 application would create a new planning permission, including a new Condition 7, which approves Blakesley Estates' **revised plans for (i) access, (ii) appearance, (iii) layout and (iv) scale**'.*

(Emphasis added)

This is their statement.

The Society have highlighted relevant words in the Local Planning Authorities (LPA) description of the development proposal which records that the LPA has accepted this application recognising it is for a **revised layout**.

The Society are of the opinion that this planning application should not have been validated by the LPA because the applicant seeks to misuse section 73 in extending the time allowed for the submission of a reserved matter, namely that of a revised layout.

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In section 4 of the application, in answering the question 'Has the development already started?' the applicant answers the question '**No**'. Clearly the applicant cannot be trusted.

The date on the application form is the 9th August 2021. The application date is recorded by the LPA to be 23rd November 2021

The date of the publication online is the 3rd December 2021.

Section 73 of the Town and Country Planning Act 1990 provides:

(1) This section applies, subject to subsection (4), to applications for planning permission for the development of land without complying with conditions subject to which a previous planning permission was granted.

(2) On such an application the local planning authority shall consider only the question of the conditions subject to which planning permission should be granted, and

(a) if they decide that planning permission should be granted subject to conditions differing from those subject to which the previous permission was granted, or that it should be granted unconditionally, they shall grant planning permission accordingly, and

(b) if they decide that planning permission should be granted subject to the same conditions as those subject to which the previous permission was granted, they shall refuse the application.

(3) [Repealed]

(4) This section does not apply if the previous planning permission was granted subject to a condition as to the time within which the development to which it related was to be begun and that time has expired without the development having been begun.

Planning and Compulsory Purchase Act 2004

Section 51 Duration of permission and consent

(3) In section 73 of the principal Act (applications to develop land without compliance with existing conditions) after subsection (4) there is inserted the following subsection—

'(5) Planning permission must not be granted under this section to the extent that it has effect to change a condition subject to which a previous planning permission was granted by extending the time within which—

(a) a development must be started;

(b) an application for approval of reserved matters (within the meaning of section 92) must be made.'

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It is the Societies opinion that this application will be in breach of subsection (5) (b) of section 73 of the principle act.

There are serious issues with this development which must be widely known within the South Hams District Council.

The obvious reason is stated in Condition 2 of the Schedule of conditions of the Planning Inspectorate outline planning application approval.

'2) Application for approval of the reserved matters shall be made to the local planning authority not later than 3 years from the date of this permission.'

Any reserved matters applications must have been received by 4th June 2020.

It stands to reason that it is too late to submit any reserved matters, including revised reserved matters.

Reserved Matters guidance is as follows on the next page which records layout as one of the five reserved matters.



Application for Approval of Reserved Matters following Outline Approval

Article 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015

The Application for Approval of Reserved Matters form should be used after an outline planning application has been approved.

A reserved matters application deals with some or all of the outstanding details of the outline application proposal, including:

- **appearance** - aspects of a building or place which affect the way it looks, including the exterior of the development
- **means of access** - covers accessibility for all routes to and within the site, as well as the way they link up to other roads and pathways outside the site
- **landscaping** - the improvement or protection of the amenities of the site and the area and the surrounding area, this could include planting trees or hedges as a screen
- **layout** - includes buildings, routes and open spaces within the development and the way they are laid out in relations to buildings and spaces outside the development
- **scale** - includes information on the size of the development, including the height, width and length of each proposed building

The details of the reserved matters application must be in line with the outline approval, including any conditions attached to the permission. If your proposals have changed in any way, you may need to reapply for outline or full planning permission.

Some, though not all, details may have been formally submitted and approved at the outline application stage, if the applicant chose to do so, or the council insisted.

The outline decision notice, issued by the council, will state which matters were reserved for later approval.

Permission lasts for two years from the last date that the reserved matters were approved, or, three years from the date that outline planning permission was approved – whichever date is the later.

Please note: Outline permission is not a permission to start work on site. The permission notice will state which matters have been reserved for later approval. When all of the reserved matters have been approved, work may begin on the site.

It is often helpful to discuss your proposal with your local authority before you send in your application – this is known as 'pre-application advice'. Your local authority will normally have details of how to go about this on its website.



By the applicants own admission (and the LPA is in agreement), the application seeks to submit revised reserved matters, which have been previously agreed by the Planning Inspectorate, after the legal time frame.

This is clearly beyond what the Section 73 section was intended to achieve and would be a failure to comply with the legislation.

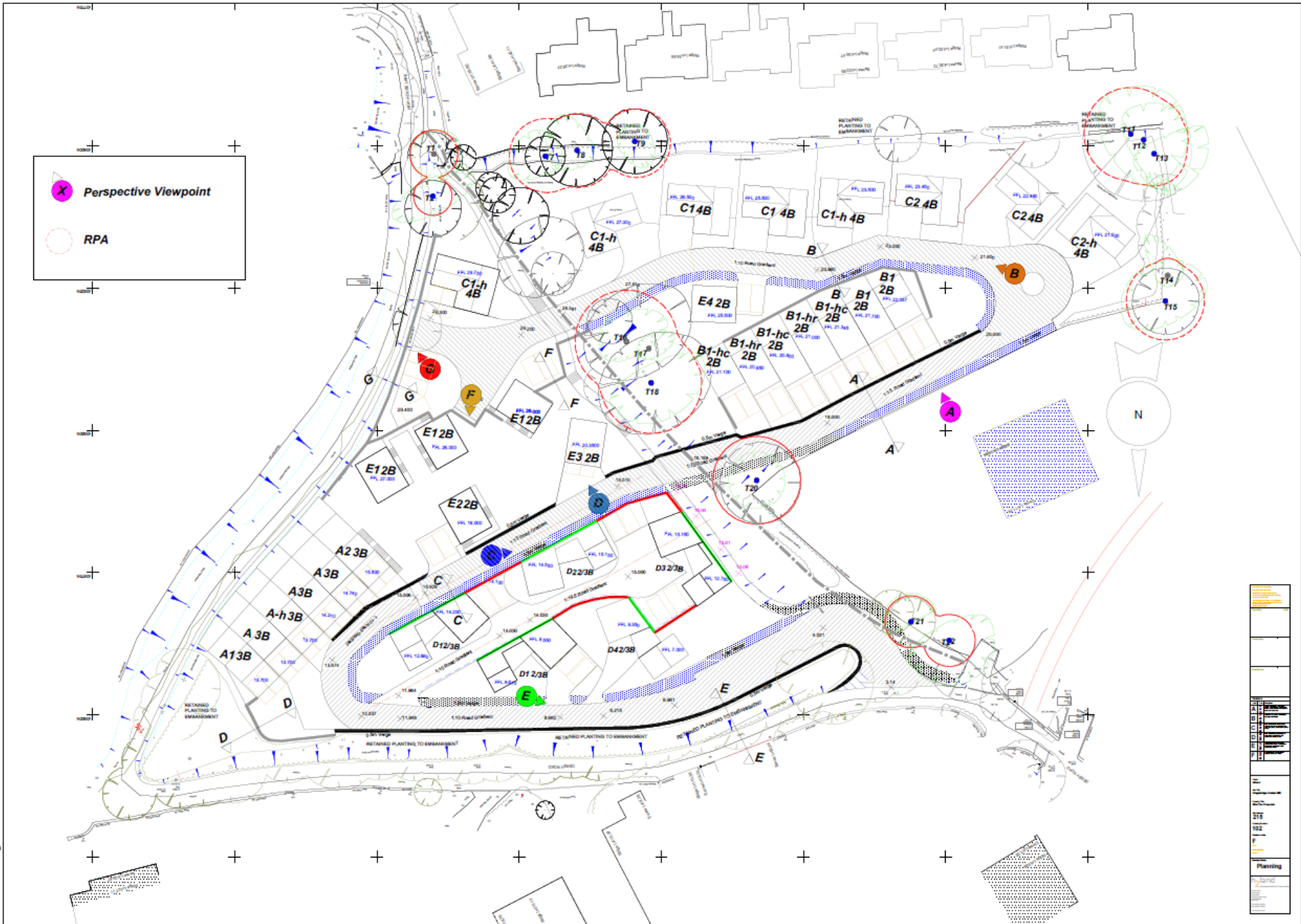
On the next two pages are the approved plan contained in planning application 3377/20/NMM and a plan included within this planning application. The proposed layout of the buildings have changed significantly. This is particularly true in the area close to the Grade II listed building of Buttville House where the Society has measured the distance to the nearest building being 29.25 metres which is significantly closer to Buttville and entering the area of landscaping that provides screening.

It is also obvious from these two drawings that the road layout of the development has changed.


It is again also obvious that the route of the PRow has been altered bringing it closer to trees protected by the TPO.

X Perspective Viewpoint

RPA



Code	Description
A	Perspective Viewpoint
B	Perspective Viewpoint
C	Perspective Viewpoint
D	Perspective Viewpoint
E	Perspective Viewpoint
F	Perspective Viewpoint
G	Perspective Viewpoint
T1	RPA
T2	RPA
T3	RPA
T4	RPA
T5	RPA
T6	RPA
T7	RPA
T8	RPA
T9	RPA
T10	RPA
T11	RPA
T12	RPA
T13	RPA
T14	RPA
T15	RPA
T16	RPA
T17	RPA
T18	RPA
T19	RPA
T20	RPA
T21	RPA



 lhc design

DATE	21024GNK
DESCRIPTION	21024GNK
ISSUED FOR	DO
DATE	2021
SCALE	1:250@A1
PROJECT	21024GNK-LHC-00-XX-PR-A-01.10
PROJECT NAME	Garden Mill, Kingsdridge
PROJECT TYPE	Site Plan Proposed
DATE	
BY	
CHECKED BY	
APPROVED BY	





The applicant fails to identify that condition 7 of 28/0560/15/O has already been the subject to a previous Section 73 Non Material Minor Amendment. A number of drawings contained within the outline planning application have been replaced by the planning application 3377/20/NMM with the result that some drawings quoted in this application are incorrect.



In any correspondence please quote application number: **3377/20/NMM**

NON MATERIAL MINOR AMENDMENT **Granted**

Town and Country Planning Act, 1990

Application No.: 3377/20/NMM

Date Received: 21 October 2020

Proposal: Non material minor amendment to planning consent 28/1560/15/O (Appeal ref: APP/K1128/W/16/3156062) to move 1 dwelling and increase path width to 2m

Location: Proposed Development Site at Sx 739 438, Derby Road, Kingsbridge

Applicant:

h2land
Barley House
Snitterfield
Stratford Upon Avon
CV37 0LJ

The Society also raises an issue with condition 15 of the appeal and the 106 agreement submitted to the Planning Inspector.

With regards to condition 15, the planning statement states para 3.10, page 8:

'It is important to note that the new Section 73 permission would be expected to mirror the existing outline conditions 3, 5, 6, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17 on matters including construction environmental management, tree protection, highways and drainage details, etc.'

Condition 15 states:

- 15) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that Order with or without modification), no windows shall be constructed on the north facing end gable wall of terrace A.

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Terrace A, no longer exists in this application and therefore condition 15 would have no effect.

Both the setting of the listed building and a 106 agreement that contained a LEMP obligation were considered to be important considerations to the Planning Inspector.

The Planning Inspector:

37. The proposed development would include significant areas of open space, and existing and new vegetation. These are important to the setting of the listed building, significant contributors to the character and appearance of the area and provide existing and potential wildlife habitats. Provision for the submission and approval of a landscape and ecological management plan, including an open space specification, and the maintenance and management of the land thereafter in accordance with the approved scheme is made in the submitted planning obligations. I consider such provision is therefore necessary and directly related to the development, and this too I have taken into account in coming to my decision.

On the 17th May, the Society wrote to the council with the following content and it is worth refreshing memories.

'Introduction.

An application was submitted to the local planning authority for a development for residential development scheme for 32no. dwellings at Allocated Site K4 Garden Mill Kingsbridge on the 8th July 2015. The application received a refusal decision on the 22nd June 2016.

Following this refusal, the applicant appealed the decision on the 7th October 2016.

The appeal was upheld on the 5th June 2017. The decision followed a public hearing held at the SHDC headquarters at Follaton House Totnes on the 29th March 2017.

After the appeal hearing, the applicant made a unilateral undertaking in support of winning the appeal. This unilateral undertaking is in the form of a 106 agreement and a copy is obtainable from within the planning application 28/1560/15/O on the LPAs planning web site, uploaded on the 18th January 2021.

The 106 Agreement Deed is a contract dated 25th April 2017 made by the then owners of the said land making a set of obligations to the South Hams District Council which are enforceable.

This was agreed by the Planning Inspectorate and supported the appeal being upheld.

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The Unilateral Undertaking 106 Agreement.

The unilateral undertaking was conditional on the grant of the permission, the commencement of the development and the Inspector being satisfied and determining that the obligations set out in schedule 2 or schedule 3 comply with the regulation 122 and 123 of the Community Infrastructure Levy Regulations 2010 whether in part or whole.

Unusually for a planning application there is no Landscape and Ecological Management Plan (LEMP) planning condition with this development site. *It is noted that the LPA requested a LEMP condition but the Planning Inspector stated there was no requirement for that condition as the land owner had made unilateral undertaking.*

The LEMP agreement is contained in schedule 3 of the 106 agreement in the form of a covenant.

1.1 of the schedule 3 agreement covenants ‘to submit the Landscape and Ecological Management Plan prior to the commencement of development’. *(Emphasis added)*

The South Hams Society are satisfied that work has started and we are confident there has been a breach of that covenant which cannot now be resolved as the owners can no longer comply with paragraph 1.1 of the covenant contained in schedule 3.

We also believe that it is likely that the contractors have committed wildlife offences due to the lack of that LEMP and a failure to employ a qualified Landscape Ecology Consultant.

The development site.

The South Hams Society was aware that a considerable social media campaign has formed under the banner of ‘Save Lock’s Hill: “Hands of our Bag-a-Maize”.

It is interesting to see this campaign has a younger age profile and it has successfully raised awareness, considerable following and interest amongs the politicians.

The South Hams Society has been keeping an interest to see the extent of what has been occurring onsite, what planning requirements were outstanding and whether we considered there had been any planning breaches of planning conditions imposed.

On the 10th of May, it was noted that the Public Footpath no. 6 was being fenced in and shifted close to the central hedgerow. The construction company installed diversion signs. The footpath quickly became unusable and at that point we raised an issue with the PRoW team at Devon County Council.

On the 13th we requested an enforcement request due to a site construction vehicle pound forming which was causing congestion issues. This detail is normally agreed as part of the pre-commencement planning conditions in a construction management plan.

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It was also reported that the arrival of a large excavator at Derby Road caused a considerable blockage led to complaints from annoyed residents. It was highlighted that while the road was blocked, ambulances would be unable to attend the Overleat care Home.

Delivery of large excavator at Derby Road, a tight squeeze.



On the morning of the 15th May we visited the site again and at this this time it was obvious that the development had commenced. It was also noticed that there were stacks of freshly growing hedgerow branches on the field and the hedgerow alongside Derby Road had been scraped out.

By this time, due to a public outcry, the district council had issued a 28 day site stop notice and a blanket TPO.

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Saturday morning the 15th of May. Evidence of fresh hedgerow clearance in stacks.



28 day stop notice installed.



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On Monday the 17th social media was alive with reports that the 28 Stop Notice had stopped nothing.



We visited again that day. It was observed that hedgerow clearance continued without any Ecologist on site checking the hedgerows for nesting or wildlife amongst surrounding ground scrub.



A director near the site was asked if a LEMP was in place and the reply was it wasn't a planning condition. We know there was no LEMP submitted at the end of 2020 as the applicant was reminded of that fact in a reserve matters application 0826/20/ARM decision notice.

We refer you in particular to paragraph 5 of the informative section.

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Dated this 21st December 2020

Patrick Whymer

**Head of Development Management Practice
for and on behalf of the Council**

(Application Ref: 0826/20/ARM)

INFORMATIVES

1 – The applicant/developer is reminded of feedback from Landscape Specialist relating to details required for subsequent conditions discharge and the LEMP, dated 8th December 2020.

2- The alignment, width, and condition of public rights of way providing for their safe and convenient use shall remain unaffected by the development unless otherwise agreed in writing before any works take place by the Devon County Council Public Rights of Way Team.

3 - Nothing in this decision notice shall be taken as granting consent for alterations to public rights of way without the due legal process being followed.

4 – Attention is drawn to advice from the Environment Agency relating to flood emergency measures, dated 3rd April 2020.

5 – Developer reminded of the need to address conditions and comply with the unilateral Undertaking attached to the outline permission, 28/1560/15/O, prior to any works taking place.

Attention was also drawn to the further requirement for a Tree Protection Plan to accord with Condition 6 of the same planning decision by the LPAs tree specialist.

One of the first actions of the development should be the installation of tree root protection fencing. Despite the very large excavator working on site, no such fencing has been installed.

We therefore record that this construction company has breached the following planning conditions of planning application 28/1560/15/O as we cannot find any ARC application approvals.

- 6) No site clearance, preparatory work or development shall take place until a scheme for the protection of the retained trees (the tree protection plan) and the appropriate working methods (the arboricultural method statement) in accordance with paragraphs 5.5 and 6.1 of British Standard BS 5837: Trees in relation to design, demolition and construction - Recommendations (or in an equivalent British Standard if replaced) shall have been submitted to and approved in writing by the local planning authority. The scheme for the protection of the retained trees shall be carried out as approved.

[In this condition "retained tree" means an existing tree which is to be retained in accordance with the approved plans and particulars.]

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- 9) Development shall not take place until details of the parking and turning areas within the site have been submitted to and approved in writing by the local planning authority; parking space shall be provided in accordance with the approved details for cars to be parked and for vehicles to turn prior to the occupation of the dwelling to which the parking and turning area relates.
- 10) Development shall not take place until details of the junction between the proposed access road and the highway shall have been submitted to and approved in writing by the local planning authority; and no dwelling shall be occupied until that junction has been constructed in accordance with the approved details. The junction shall thereafter be retained.
- 11) Development shall not take place until details of the access road through the site including roads, footpaths, streetlighting and retaining walls have been submitted to and approved in writing by the local planning authority. These details shall include plans and sections indicating the layout, levels and gradients, materials and methods of construction. The development shall be carried out in accordance with the approved details.
- 13) No site clearance, preparatory work or development shall take place, until a Construction Management Plan has been submitted to, and approved in writing by the local planning authority. The Plan shall provide for:
 - i) the parking of vehicles of site operatives and visitors;
 - ii) the management of delivery vehicle numbers and routes
 - iii) loading and unloading of plant and materials;
 - iv) storage of plant and materials used in constructing the development;
 - v) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
 - vi) wheel washing facilities;
 - vii) photographic evidence of the condition of the adjacent public highway prior to commencement of any work;
 - viii) measures to control surface water run-off from the site during construction;
 - ix) delivery, demolition and construction working hours.

The approved Construction Management Plan shall be adhered to throughout the construction period for the development.



But our biggest concern is the site owner's complete disregard to ensure that the development project is undertaken in accordance with wildlife legislation, National Planning Policy Framework (NPPF) and other local plans and planning policies by not having obtained a Landscape & Ecological Management Plan as was required by the Unilateral Undertaking 106 agreement.

It is no longer possible for the site owner to comply with their Unilateral Undertaking that was instrumental in the planning appeal being upheld.

*It is so serious an omission and the contractor has displayed such a brazen attitude in carrying on with the development and ignoring a 28 day stop notice that **the South Hams Society calls for the district council to take legal action for breach of that unilateral undertaking 106 agreement to quash the planning application without delay.***

The Society also reminded the council of an enforcement notice statement that the council had previously issued.

SHDC Enforcement update issued on the 17th May 2021

[Planning enforcement case 025920 - UPDATE - Site at Garden Mill (K4), Derby Road, Kingsbridge, Devon - Alleged Breaches of 28/1560/15/O – Construction Management Plan and Impact on Public Right of Way within the AONB

With regard to alleged unauthorised works currently being undertaken at Site at Garden Mill (K4), Derby Road, Kingsbridge, Devon. Alleged Breaches of 28/1560/15/O – Construction Management Plan and Impact on Public Right of Way within the AONB – Case reference 025920

The Council has served a temporary stop notice (TSN) but is aware of works being undertaken on site currently (since the notice has been served). The Planning Enforcement team, Legal Team, local ward members, Tree Officer and Planners are currently working closely with each other to investigate this and decide any appropriate further action to take].

The developer has continued on with extensive groundworks with complete disregard to the council's requests to stop work until such times as they have fulfilled their planning precommencement conditions.

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We now have discovered that, as well as the failure to comply with Schedule 3 Landscape and Ecology Management Plan with the production and agreement of a LEMP, Blakesley Estates has failed to comply with the requirements of Schedule 2 – Affordable Housing S1.1. We believe it likely that section S1.3 has not been complied with either.

SCHEDULE 2 -AFFORDABLE HOUSING

Part 1 - Covenants by the Owner

- S1 The Owner hereby covenants with the District Council as follows:-
- S1.1 Commencement of Development shall not take place until Commencement Notice in the form attached at Schedule 1 has been served on the Council 10 working days before the Commencement of Development and a detailed scheme has been submitted to the District Council for approval showing the type tenure location size and mix of all of the Affordable Housing Units of which three (3) shall be provided as Affordable Rented Units and one (1) shall be provided as Shared Ownership Units unless otherwise agreed including the identity of the Shared Ownership Units and the Affordable Rented Units and to include the Owner's proposals for the construction of the Affordable Housing Units in accordance with the Homes and Communities Agency Homes design and quality standards current at the time of construction

It is apparent that this was still the case up to at least 15th October 2021 as it is recorded in planning application 28/1560/15/O.

As previously stated, the applicant did not tell the truth when filling out section 4 of the planning application form stating that the development had not started. With the extensive work that the legal department of the district council and LPA has carried out monitoring the breach of a 'Stop Notice' it is disappointing to see an application form is validated where it must be known that the applicant was dishonest with its completion.

But the warning signs of the integrity of this developer is important with regards to the 106 agreement.

It is clear that this developer is seeking a new planning consent by the section 73 route, which we strongly believe is being misused.

A new planning consent issued by the LPA would not be subject to the Unilateral Undertaking 106 agreement previously agreed as that agreement is linked only to the planning application 28/0560/15/O.

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It is also apparent that because the applicant has commenced the development, it is no longer possible to comply with the biodiversity requirements.

The submitted 'Biodiversity Net Gain Assessment'.

*1.1.3 An Extended Phase 1 Habitat survey of the site was undertaken on 23 August 2021. The survey followed guidelines published by JNCC (2010) and Institute of Environmental Assessment (1995), and identified the main habitat types on the site. The results of the survey were detailed on a Phase 1 Habitat plan; refer to Appendix 1. **In addition to the Extended Phase 1 Habitat survey, 'habitat condition' was assessed in accordance with the Biodiversity Metric 3.0. This provided a baseline against which biodiversity changes through the proposed development of the Site could be formally quantified and assessed; refer to Figure 3 and Appendix 2.***

1.1.4 The BNG assessment for the proposed development demonstrates that Biodiversity Net Gain would not be achieved within the application Site boundary. Overall, the development proposals are predicted to result in a -34.36% reduction in area-based Biodiversity Units (hereafter 'Habitat Units') and a +20.28% increase in hedgerow Biodiversity Units (hereafter 'Hedgerow Units'). The Joint Local Plan Policy DEV26 target for BNG is a 10% increase in both Habitat Units and Hedgerow Units. Therefore, off-site habitat creation / enhancement (i.e. biodiversity off-setting) is an alternative means by which the 10% target in Habitat Units could be achieved.

2 Baseline Condition Assessment

Habitats

2.1.1 The Biodiversity Metric 3.0 requires a 'baseline' of habitat condition on site prior to works commencing. Topsoil stripping and landscaping had already begun at the time of the August 2021 survey, and the majority of the grassland on site had been removed.

This is a disappointing report in that clearly the statement in paragraph 1.1.3 highlighted cannot be true. The plan on the following page displays that an adequate biodiversity baseline was impossible to complete to an adequate level.

The South Hams Society therefore respectfully request that the LPA review the validation of this application which we are of the opinion is beyond the scope of a section 73 planning application in that it fails the paragraph 5 instruction.

The Society requests that the South Hams District Council respond to this letter.

For and on behalf of the South Hams Society.










Richard Howell,
Chairman.

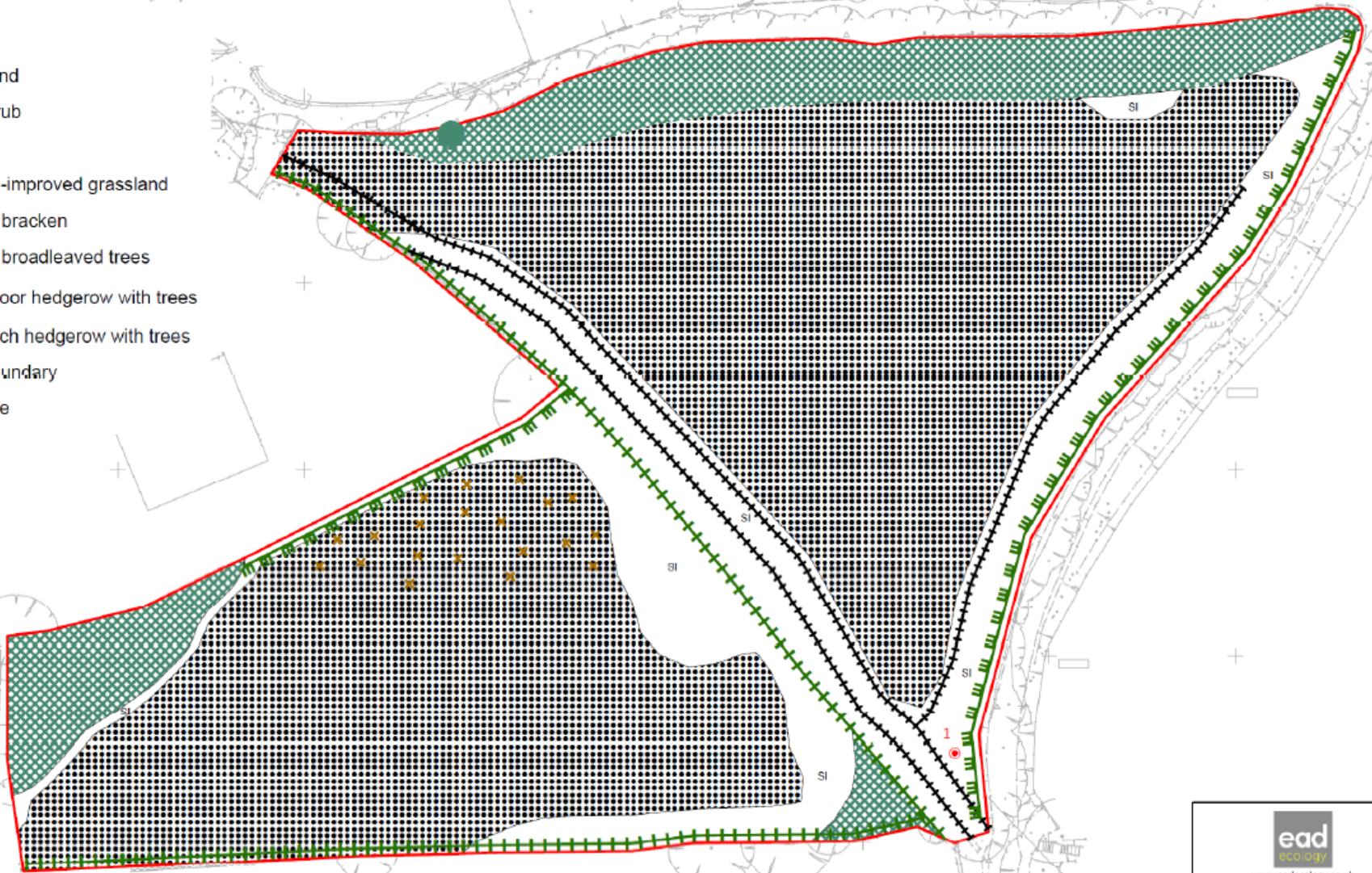
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Key

-  Bare ground
-  Dense scrub
-  Fence
-  Poor semi-improved grassland
-  Scattered bracken
-  Scattered broadleaved trees
-  Species-poor hedgerow with trees
-  Species-rich hedgerow with trees
-  Survey boundary
-  Target note



 www.eadecology.co.uk
Blakeley Estates
Garden Mill, Kingsbridge
Phase 1 Habitat Plan
Date: 11/10/2021