



Harbour Watch East Portlemouth TQ8 8PU



Charity No 263985

Registered Address: 20 Highfield Drive, Kingsbridge, Devon TQ7 1JR
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PLANNING REF: 0854/23/FUL

DESCRIPTION: Demolition of existing detached house & detached garage, erection of replacement detached dwelling, outside pool, boathouse & associated landscaping.

ADDRESS: Harbour Watch East Portlemouth TQ8 8PU.

Officer Name: Charlotte Howrihane

25th April 2023

LETTER OF OBJECTION FROM THE SOUTH HAMS SOCIETY

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. We support the right development - in the right places - and oppose inappropriate development.

SOUTH HAMS SOCIETY RESPONSE TO PRE APPLICATION DOCUMENT- OFFICER RESPONSE 27/03/2023

Within this document we note that the Case Officer has already expressed concerns as to the scale of the building, landscape impact, trees, housing imbalance and how the proposals sought to reduce carbon emissions.

Additional concerns relating to the proposed boathouse are set out regarding the scale and design, landscape impact and concerns from Natural England on the impact on the SSSI.

The Society implicitly share these concerns and it is our view that these proposals are in contravention of planning policy at both National and Local level.

The Officer statement acknowledges that the site is within '*an extremely sensitive location*' and the Council's Landscape Specialist has raised concerns with regard to ensuring that the existing coastal slope vegetation is maintained, protected and enhanced throughout the construction phase and beyond.

The Society believes that any erosion and degradation of the existing vegetation in order to facilitate development is wholly unacceptable and should be considered a significant material constraint to the proposals.

We welcome the comments regarding carbon reduction requirements and the suggestion that the existing building could be retrofitted.

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It is abundantly clear that a number of issues will need to be addressed in order to achieve a more sustainable outcome.

Within the Internal Consultee response - Trees - 04/04/2023 Appraisal 4 the Tree Officer has stated that *'the loss of all sycamores on site may lead to a readily appreciable erosion of tree cover noting the success of sycamores along coastal slopes and the ecology they support. Refinement of this management prescription is required'*.

The Society agree with this assessment, some of the sycamores may not be considered exceptional specimens but their combined attributes are beneficial to both wildlife, and the highly appreciated public visual amenity of the sylvan location.

THE SOCIETY OBJECTION

The South Hams Society wish to object to this development proposal which would impose a significant increase of new built form on a highly scenic area of the South Devon AONB.

The proposed three storey dwelling on a larger footprint, a large raised external terrace with an outdoor plunge pool, an enlarged parking / turning area and a new boathouse will present visually impactful features that are detrimental to the special qualities of the protected landscape.

The location of the proposals sits within the AONB, Undeveloped Coast and SSSI Designation where the environmental and aesthetic qualities of the waterfront landscape present precious public amenity benefits that are appreciated by locals and visitors alike.

The South Hams District Council has a statutory duty to protect and enhance the South Devon AONB, which is a nationally prized landscape and a major economic asset.

Section 85 of the Countryside and Rights of Way Act 2000 requires the Local Authority to adhere to the purpose of conserving and enhancing the landscape and natural beauty of AONB's.

NPPF paragraph 176 specifies that great weight must be given to this purpose.

The applicants are therefore required to demonstrate how the location, siting, layout, scale and design of the proposal both conserves and enhances what is special and locally distinctive to the site.

The Society believes that the proposals will have a significant detrimental impact on the landscape and scenic beauty of the AONB and therefore the requirement to conserve and enhance is not demonstrated.

SHDC guidance on TREES ON DEVELOPMENT SITES states:

'It is important that when new development is taking place, the high quality trees which exist on the site are identified and retained. It is also important that space is made, wherever possible, for the planting of new trees'

'There is a clear and well established process for protecting trees in relation to new development.

This process is set out in British Standard 5837: 2012 which establishes a clear process for:

- surveying trees on a site coming forward for development.

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- *classifying their level of importance and their priority for being retained on a development site.*
- *incorporating their retention into the design at the outset.*
- *putting in place measures to ensure their protection from harm during development.*
- *putting in place long term management measures for their care once development is in place'.*

Guidance further sets out that:

'Trees can be a significant asset to a development site and can add to the value of properties. Proper and early consideration can bring forward the right design'.

It is the view of the Society that the trees both on site, and adjacent to it, provide high en masse amenity value in a sensitive estuarine location and must be retained in order to preserve the aesthetic special qualities of the waterfront landscape.



Within the AONB, Undeveloped Coast and Heritage Coast, Policies DEV 23, DEV 24 & DEV 25 require development to conserve and enhance landscape character, scenic and visual quality, and the natural beauty of their surroundings.

DEV 25 (8) specifically requires development proposals to:

- *be designed to prevent the addition of incongruous features.*
- *be located and designed to respect scenic quality and maintain an area's distinctive sense of place, or reinforce local distinctiveness.*
- *be designed to prevent impacts of light pollution from artificial light on intrinsically dark landscapes.*

It is the view of the Society that the proposal will inflict detrimental impact on the special qualities of the waterfront landscape and SSSI, and therefore conflicts with these policy objectives.

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The Society note that Salcombe Town Council have submitted an objection to the application and have expressed their concerns regarding the glazing on the north elevation overlooking the estuary which would create significant light pollution in a dark area of the AONB and could impact upon the SSSI, and we share those concerns.

Guidance within NPPF paragraph 180 sets out to identify and protect tranquil areas that remain relatively undisturbed by noise and are prized for their recreational and amenity value, and this includes limiting the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

The importance of dark skies to nature, wildlife and human well-being is increasingly recognised in England through planning law, and particularly so within AONBs (as recognised in the Glover review) where light pollution can affect landscape character.

Local AONB guidelines state:

'Natural nightscapes and dark skies are defining special qualities of the South Devon AONB: they are of natural, cultural and scenic importance'.

The Society are deeply concerned that this proposal will introduce impactful light spillage into the sensitive estuarine location and in accordance with policy this must be resisted.

In conclusion, the Society are of the opinion that the proposal presents overdevelopment of the site that does not comply with the key policy objectives of maintaining and enhancing the unique landscape and seascape character of the Undeveloped Coast and AONB.

We are deeply concerned about the cumulative effect of incongruous waterfront development in this area, and we vehemently believe that if the estuary / ria and SSSI Designation are to retain their aesthetic and environmental special qualities, then development proposals such as this must be curtailed.

In 2019 an application was submitted for a property further along the East Portlemouth waterfront at Millbay (The Weald 0782/19/FUL).

Proposed reconstruction of garage with extensions to form sail loft, boat storage and ancillary residential accommodation to basement.

Within the Officer report - 04/10/2019 when discussing PROTECTED LANDSCAPES the Officer stated:

'Within the AONB, Undeveloped Coast and Heritage Coast, the scale and design of any new built form should be appropriate to the character and natural beauty of the protected landscape. There are some notable local examples of new development which is clearly contrary to the prevailing character. These are prominent features in the landscape that are damaging to local distinctiveness, rural character and scenic quality, and we would not seek to perpetuate or expand this deterioration of character'.

The Society agree implicitly with this statement which we feel is highly relevant and applicable to the proposed development at Harbour Watch.

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Foul and surface water drainage - The Salcombe / Kingsbridge SSSI Site.

In addition, the drainage details submitted fail to record that the site is adjacent to the Salcombe Kingsbridge Estuary SSSI site.

The Society have measured the distance of the drainage field to the SSSI site to be no more than 23 metres.

As the proposal is for a new dwelling and a new sewage treatment plant, the proposal fails to comply with the general binding rule number 18:

Rule number	Discharges to surface water	Discharges to ground	General binding rule
18	No	Yes	Discharges must not be in, or within 50 metres of, a Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site, or biological Site of Special Scientific Interest (SSSI), and must not be in an Ancient Woodland.

There is no plan illustrating the nearest public sewer service as is required by the FDA1 assessment form.

The proposal also records a surface water discharge from the vehicle parking area and development discharging to the SSSI foreshore.

The Society are pleased to see that the Case Officer has consulted with English Nature.

The list of operations requiring consultation with Natural England is shown on the next page.



Notification
date

SITE NAME: SALCOMBE-KINGSBRIDGE ESTUARY

OPERATIONS ~~LIKELY TO DAMAGE THE FEATURES OF SPECIAL INTEREST~~
REQUIRING PRIOR CONSULTATION WITH ENGLISH NATURE

<u>Standard Ref No</u>	<u>Type of Operation</u>
1	Cultivation, including ploughing, rotovating, harrowing and re-seeding.
2	Grazing.
3	Stock feeding.
4	Mowing or other methods of cutting vegetation.
5	Application of manure, fertilisers and lime.
6	Application of pesticides, including herbicides (weedkillers).
7	- Dumping, spreading or discharge of any materials
8	Burning.
9	The release into the site of any wild, feral or domestic mammal, reptile, amphibian, bird, fish or invertebrate, or any plant or seed.
10	The killing or removal of any wild mammal, reptile, amphibian, bird, fish or invertebrate, including pest control.
11	The destruction, displacement, removal or cutting of any plant.
12	The introduction of tree or wood-land management, including afforestation or tree planting.
13a	Drainage (including the use of artificial drains)).
13b	- Modification of the structure of water courses (e.g., rivers, streams, springs, ditches, dykes, drains), including their banks and beds as by re-alignment, regrading and dredging.
13c	Management of aquatic and bank vegetation for drainage purposes.
14	The changing of water levels and tables and water utilisation (including irrigation, storage and abstraction from existing water bodies and through boreholes).
15	Infilling of ditches, drains, pools or marshes.
16a	The introduction of or changes in freshwater fishery production management including sporting fishing and angling.
16b	The introduction of or changes in coastal fishing practice or fisheries management and seafood or marine life collection including the use of traps or fish cages.
17	- Reclamation of land from sea, estuary or marsh.
18	Bait digging in intertidal areas.
19	Erection of sea defences or coast protection works, including cliff or landslip drainage or stabilisation measures.
20	Extraction of minerals, including shingle, sand and spoil.
21	Construction, removal or destruction of roads, tracks, walls, fences, hardstands, banks, ditches or other earthworks, or the laying, maintenance or removal of pipelines and cables, above or below ground.
22	Storage of materials.
23	Erection of permanent or temporary structures, or the undertaking of engineering works, including drilling.
26	Use of vehicles or craft likely to damage or disturb features of interest.
27	Recreational or other activities likely to damage features of interest.
28	The introduction of or changes in game and waterfowl management.



Road and Water Front Damage

The Society is also concerned by the level of damage occurring to the lane alongside the estuary from South Pool to Mill Bay.

The property is accessed along a single track road with passing places, recorded as a weak road.





It is only 150 metres from a previous shore collapse in 2021 at Ditch End, the site of another property demolition and replacement and likely to be a result of water runoff and heavy traffic.



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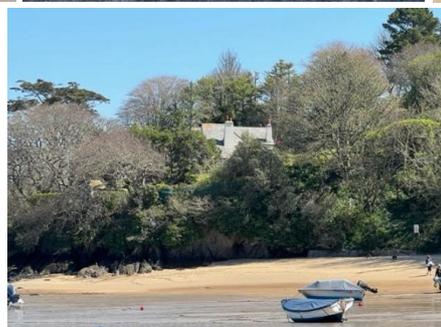
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East Portlemouth Resident:

'Harbour Watch, one of the remaining old 30s houses right on the foreshore. Harbour Watch kind of encapsulates the character of the foreshore in East Portlemouth as it used to be.....The original windows of the house have mostly been replaced by large slabs of glass that don't suit the original 30s design, however apart from that the original house is still intact and the roof is rather beautiful I think. Even the old boathouse that belongs to it, sitting on the foreshore, has a lovely Enid Blyton charm to it'.

The character of the foreshore houses at East Portlemouth



The South Hams Society respectfully request refusal of this application.

For and on behalf of the South Hams Society.

Richard Howell,
Chairman.

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