



3847/22/FUL – OUTER HOPE COVE



Charity No 263985

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PLANNING REF: 3847/22/FUL

DESCRIPTION: Erection of 6 semi-detached two bedroom affordable dwellings, 4 detached four bedroom houses with detached double garages, associated new highway access & service road, foul & rainwater drainage strategy, landscape & habitat creation measures & detail (resubmission of 1303/21/FUL).

ADDRESS: Land at SX 680 402 east of Thornlea View, Hope Cove.

26th 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.

The site



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The proposed site for 10 houses lies outside the development boundary of Outer Hope Cove and within the National Designation of the South Devon AONB, the Natural England designation of the Heritage Coast and the Joint Local Plan designation of the Undeveloped Coast. The site is highly visible when travelling along the Inner Hope to Outer Hope road and would effectively merge the view of the built landscape of Outer Hope with that of the Galmpton hamlet.

(View V2 of the South Huish Neighbourhood Plan)



The Society will concentrate on the outcome of the JLP examination and **remind the planning officer of the remarks made by the Planning Inspectorate after the public examination of the 2014 - 2034 Joint Local Plan.**

The Planning Inspectorate made these comments following the local planning authority's failure to give the South Devon Area of Outstanding Natural Beauty enough weight in the planning balance in the **Post Hearing Advice.**

'Further potential main modifications

Housing

- 4. As discussed within the hearings we have concerns with regard to some allocations proposed within the TTVPA, in particular those which are located within an Area of Outstanding Natural Beauty (AONB).***
- 5. It is stated in the NPPF that the AONB should be given the highest status of protection in relation to landscape and scenic beauty. The available evidence does not demonstrate that sufficient weight has been given to this requirement when allocating some sites for housing.***

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Unless clear evidence is available now, sites within the AONBs should be deleted as housing allocations.

7. In relation to Policy TTV30 the JLP appears to be reliant on the delivery of 650 dwellings within the sustainable villages. This should be clearly set out within policy. The addition and removal of villages from the Figure 5.8 list of sustainable villages must be set out as a MM. **In addition some of the villages listed within Figure 5.8 are located within an AONB. Whilst paragraph 5.159 recognises this, the available evidence does not demonstrate that sufficient weight has been given to the AONBs when determining whether settlements are suitable for housing. Unless clear evidence is available now, settlements within the AONBs should be removed from Figure 5.8 and this should be set out as a MM.'**

The list of required deletions was recorded by the LPA within the Main Modification MM35. The extract is below.

MM35	Strategy for TTV Policy Area – Fig 5.8 and para 5.158 and 5.10	Villages able to accommodate around 30 dwellings each	Blackawton, East Allington, Harbertonford, Marldon, Sparkwell, Ugborough Bridestowe, Exbourne, Lewdown, & Spreyton
		Villages able to accommodate around 20 dwellings each	Berry Pomeroy, Ermington , Halwell, Harberton, Lee Mill, Rattery , Staverton, Woolston Green Bratton Clovelly, Highampton, Lamerton, Milton Abbot, Northlew, Sampford Courtenay
		Villages able to accommodate around 10 dwellings each	Ashprington, Aveton Gifford, Avonwick, Beesands, Bigbury, Brixton, Churchstow, Cornworthy, Diptford, Dittisham, Down Thomas, East Prawle, Frogmore, Holbeton, Hope Cove, Kingston, Kingswear, Lee Moor, Loddiswell, Malborough, Moreleigh, Newton Ferrers, Noss Mayo, Rattery, Ringmore, St Ann's Chapel, Slapton, South Milton, Stoke Fleming, Stoke Gabriel, Strete, Torcross, Thurlestone, Wembury, West Allington, West Charleton, Wotter, Wrangaton. Bere Ferrers, Broadwoodkelly, Buckland Monachorum, Crapstone, Folly Gate, Grenofen, Inwardleigh, Monkokehampton, Stowford, Sydenham Damerell

You will note that Hope Cove is one of the villages deleted from the list by South Hams District Council.

The final report from the Planning Inspectorate made the following comments regarding the deletions.

Report to West Devon Borough Council, South Hams District Council and Plymouth City Council

'Sustainable villages allowance

89. Figure 5.8 in the Plan identifies the sustainable villages and indicative levels of housing provision for each village. **This includes villages within the AONB. However these are not justified as the evidence does not demonstrate that due consideration has been given to the**



level of protection AONB has in national policy. These villages are therefore to be deleted from figure 5.8 as set out in MM35. However the deletion of villages within the AONB from the list does not necessarily rule out any housing development in these locations over the period of the Plan.

Where there is evidence to demonstrate that unacceptable harm will not be caused to the AONB, proposals may continue to be brought forward through neighbourhood plans in accordance with Policy DEV27.

90. The allowance for development in the sustainable villages needs to be reduced to 550 dwellings to reflect the deletion of villages within the AONB from figure 5.8. This needs to be incorporated within Policy TTV30 to ensure that the level of housing provision expected to be delivered and the overall policy intentions are clear [MM34]. It also provides consistency with the changes to the housing supply figure 3.3 proposed under MM3. Consequential changes to figure 5.1 are also necessary and this requirement has been added to MM3.
91. MM34 and MM35 also makes some other changes to Policy TTV30 and its supporting text to ensure it is clear that the housing numbers in figure 5.8 are indicative only. **Actual provision is to be provided through neighbourhood plans or through meeting identified local needs, subject to being consistent with other relevant Plan policies.** It also adds some villages and deletes others within Figure 5.8 to reflect the evidence and ensure the list of sustainable villages is justified. Whilst the amended wording refers to development being 'within' the sustainable villages, the Plan does not define settlement boundaries. It will be up to neighbourhood plans or other development plan documents to determine what sites are 'within' each settlement.'

The Society would here refer the planning officer to the JLP page 238:

'Policy TTV25

Development in the Sustainable Villages

The LPAs support the preparation of neighbourhood plans as a means of identifying local housing and other development needs in the sustainable villages. Development within the sustainable villages, including the indicative level of housing set out in Figure 5.8, should be provided through neighbourhood plans, unless such provision would conflict with other policies of the JLP.

5.163 **It will be for neighbourhood plans themselves to determine which sites to bring forward for development, provided that they are consistent with the provisions of the JLP.** To help identify a potential housing supply figure for the individual Sustainable Villages, and to provide some guidance for the level of housing that might be appropriate in a village, an indicative assessment has been made of the potential number of homes that are capable of coming forward through neighbourhood plans (the South Hams & West Devon Village Sustainability Assessment Framework', Feb 2017). This assessment is based upon factors such as the level of services and facilities available in each settlement, the accessibility of

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larger settlements, the quality of digital communications, and the availability of sites in the SHLAA. These indicative housing figures are set out in Figure 5.8.'

These are the sustainable villages as listed in the JLP. **Hope Cove is not listed as a sustainable village.**

Figure 5.8. Indicative Levels of New Housing in Sustainable Villages

Villages able to accommodate around 30 dwellings each	Blackawton, East Allington, Harbertonford, Marldon, Sparkwell, Ugborough Bridestowe, Exbourne, Lewdown, Spreyton
Villages able to accommodate around 20 dwellings each	Berry Pomeroy, Ermington, Halwell, Harberton, Lee Mill, Staverton, Woolston Green Bratton Clovelly, Highampton, Lamerton, Milton Abbot, Northlew, Sampford Courtenay
Villages able to accommodate around 10 dwellings each	Lee Moor, Morleigh, Rattery, Wotter Broadwoodkelly, Folly Gate, Grenofen, Inwardleigh, Monkokehampton, Stowford

Therefore, in accordance with the advice of the Planning Inspectorate, any development proposal in Hope Cove can only come through the Neighbourhood Plan process.

Hope Cove is included as part of the South Huish Neighbourhood Plan adopted on the 20th May 2021, importantly adopted after the Joint Local Plan's adoption in 2019.

Noticeably this proposed site lies outside the SHNP settlement boundary for Hope Cove and is not included as an acceptable development site within the neighbourhood plan.

The Society highlights the SHNP policies **SH Env1** and **SH Env5**

*'Policy SH Env1 Settlement Boundaries and avoidance of coalescence Settlement boundaries for Hope Cove and Galmpton are designated in this Plan and illustrated in figures 14 and 15. Development inside the settlement boundaries will be supported in principal subject to National Policy and Guidance and the Development Plan. **Development proposals outside the settlement boundaries will be treated as development in the open countryside.***

To protect the character and appearance of Hope Cove, Galmpton and South Huish, development which erodes the visual separation of the settlements will not be permitted.'

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Policy SH Env5 Locally Important Views

Locally important views are illustrated in figures 17A and 17B. The quality of the views to the coast or the countryside should be safeguarded in any future development within the Parish. Development should not be overly intrusive, unsightly or prominent to the detriment of the view as a whole, or to the landmarks within the view.

The locally important view V2 is on page three of this letter.

The Society are of the opinion that the applicant cannot address the reasons for refusal of the previous decision notice for this site (1303/21/FUL) and in particular reasons 1 & 3:

- 1. The development represents new development in the countryside, in a poorly connected location outside of the defined settlement boundary, and is without adequate justification, contrary to the adopted spatial strategy of an up-to-date development plan. As a result, the development is not considered to support the principles of sustainable development and is contrary to policies SPT1, SPT2, TTV1, TTV26, and TTV27 of the Joint Local Plan ('JLP'), and policies SH Env1 and SH H3 of the South Huish Neighbourhood Plan ('SHNP').*
- 3. The proposed development is sited within the AONB and designated Undeveloped/Heritage Coast. By virtue of the quantum, siting, scale, form, and appearance of the proposed development it would neither conserve, nor enhance the AONB and Undeveloped Coast, and would instead be injurious to their special qualities. The development does not represent high-quality design. The application is contrary to policies DEV10, DEV20, DEV23, DEV24, DEV25, and DEV28 of the JLP, and policies SH Env2, SH Env5, and SH HBE3 of the SHNP (and the NPPF).*

It is the South Hams Society's view that giving due regard to the Planning Inspectorate recommendation to the Joint Local Plan Councils that development must come forward through Neighbourhood plans and the fact that this site has not been promoted through the SHNP, **then this planning application must be refused.**

For and on behalf of the South Hams Society.

Richard Howell,

Chairman.