



PLANNING REF: 1543/24/FUL

DESCRIPTION: Conversion of barn to dwelling

ADDRESS: Land at SX 773 357 East Prawle.

15th August 2024

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 South Hams Society is **objecting** to this planning application.

History of the Area.

The barn is located beside the Chivelstone Public Byway 14, a narrow dead end lane that leads from the village of East Prawle to the National Trust Car Park (Land given in 1966 by the Triangle Trust 1949 Fund).

About the middle of 1865, 'The United Kingdom Telegraph Co.' extended their line from Totnes to Kingsbridge, the wires being carried along the turn pike road between the two towns. Towards the end of 1868, Sir William Mitchell, the proprietor of the Shipping Gazette, also carried a wire from that Kingsbridge office to his signal station at Prawle, thus being enabled to supply his newspaper with early shipping intelligence. Born in Modbury, Sir William Mitchell was a significant individual. He succeeded in introducing an international code of signals, which was gradually adopted by every maritime country, and in establishing signal stations for reporting the movements of all ships using the international code. In reward for his public services he was knighted in 1867.

The telegraph line was not taken over by 'The United Kingdom Telegraph Co.' but kept in working order by the Government. The Public Byway subsequently served the Admiralty and became a Lloyds Signal Station by 1882. The nearby former signal station cottages were built around the turn of the twentieth century.

One significant signal transmitted during WW1 was on the on the 9th June 1916, when airship C-8 ran out of petrol south of Start Point. The Air Ministry gave a very matter-of-fact account of the loss of C8, including the fact that that Douglas Wilkings stated that the other three men abandoned the airship to prevent it from sinking, approximately $\frac{3}{4}$ of an hour before the patrol boat HMS Larne arrived. Wilkings, being a non-swimmer, remained on board and was later rescued by a French vessel.

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The account states that Larne took C8 in tow 24 miles south of Start Point, Devon, but, being unable to save it, the airship was deliberately sunk at 7.16pm. The other three men perished.

The Public Byway has mostly served government facilities, significantly more around the two world wars, only changing when the cottages were sold and the National Trust obtained the land along the coast and provided a car park.

The Public Byway is narrow, approximately 1200 meters from East Prawle with only a few places to pass.

The building, the subject of this application, appears on the Tithe map and is recorded in 1842 as being owned by Ely Wood, the owner of just two fields in the Chivelstone Parish. The building was recorded on maps as a ruin from the mid 1940's onwards, or not shown at all.

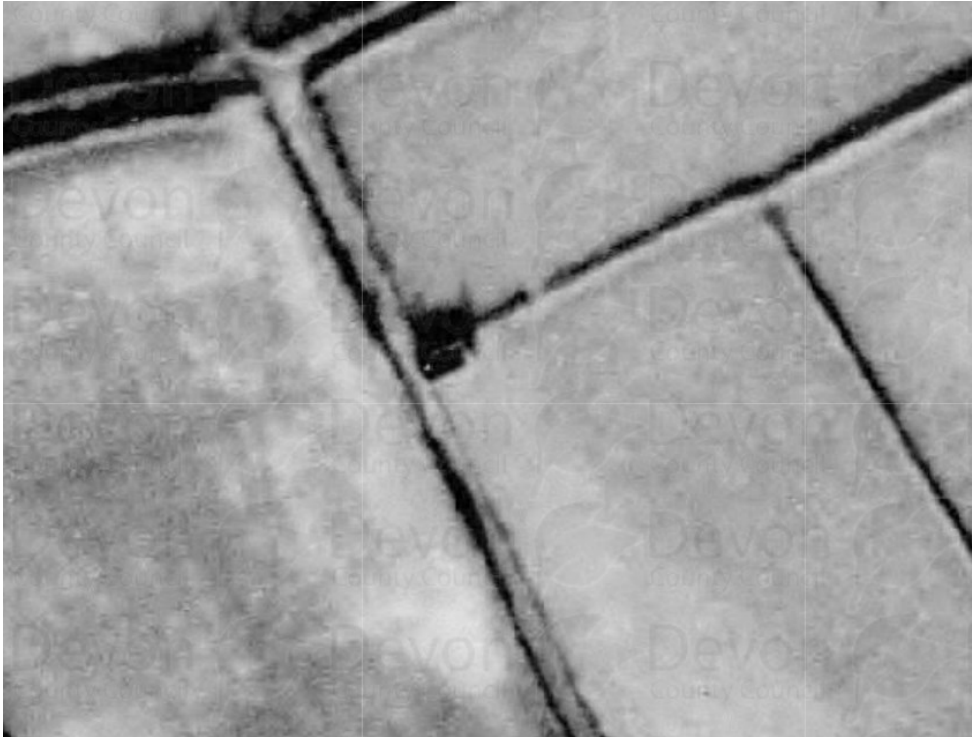
Ordnance Survey Maps 1944-1973, recorded as a ruin.



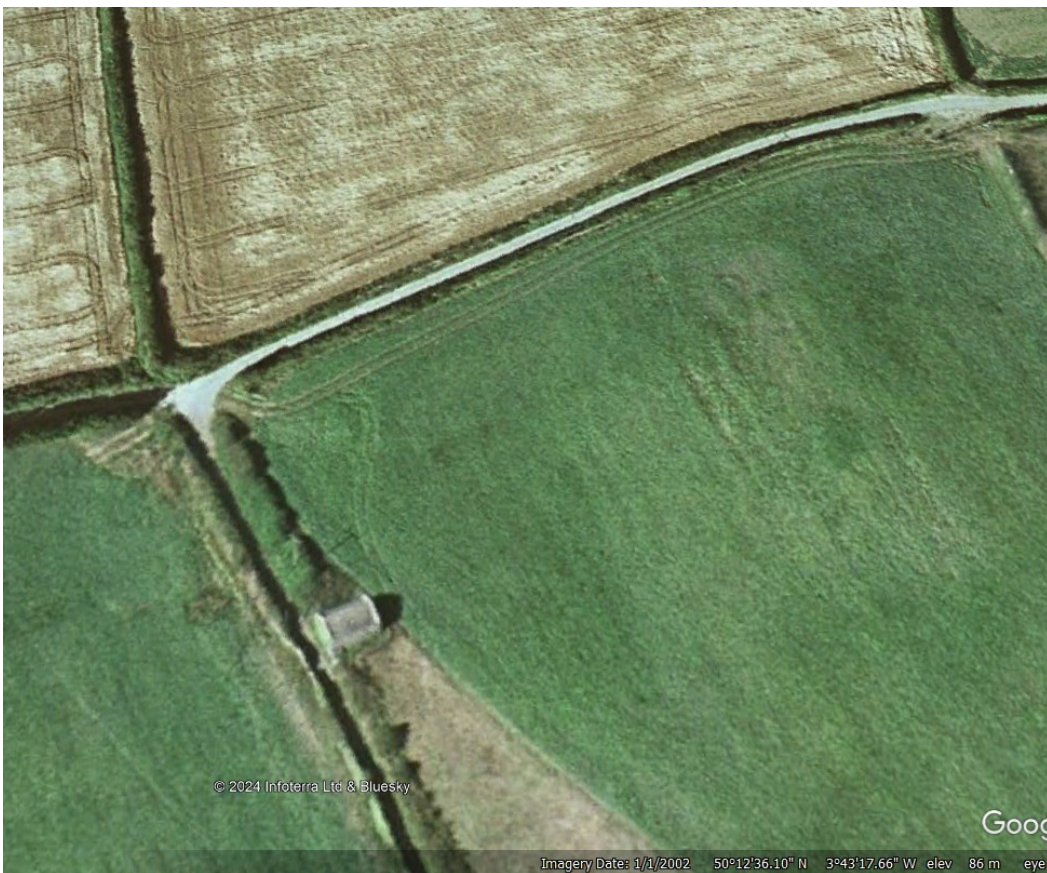
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RAF 1946, a ruin.

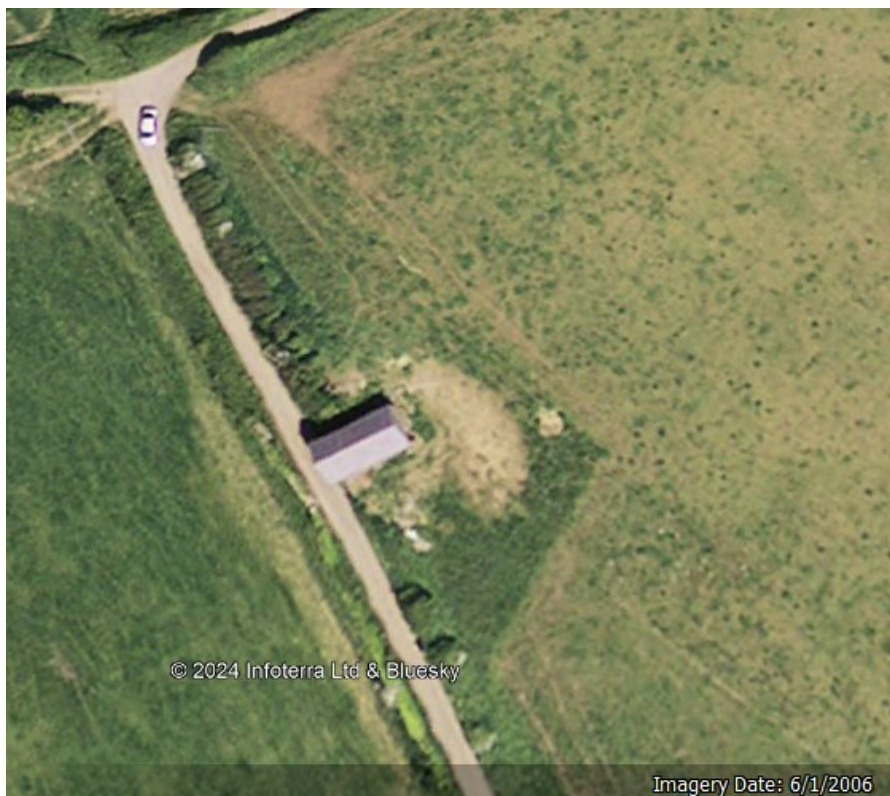


Google 2002, the building remains a ruin.

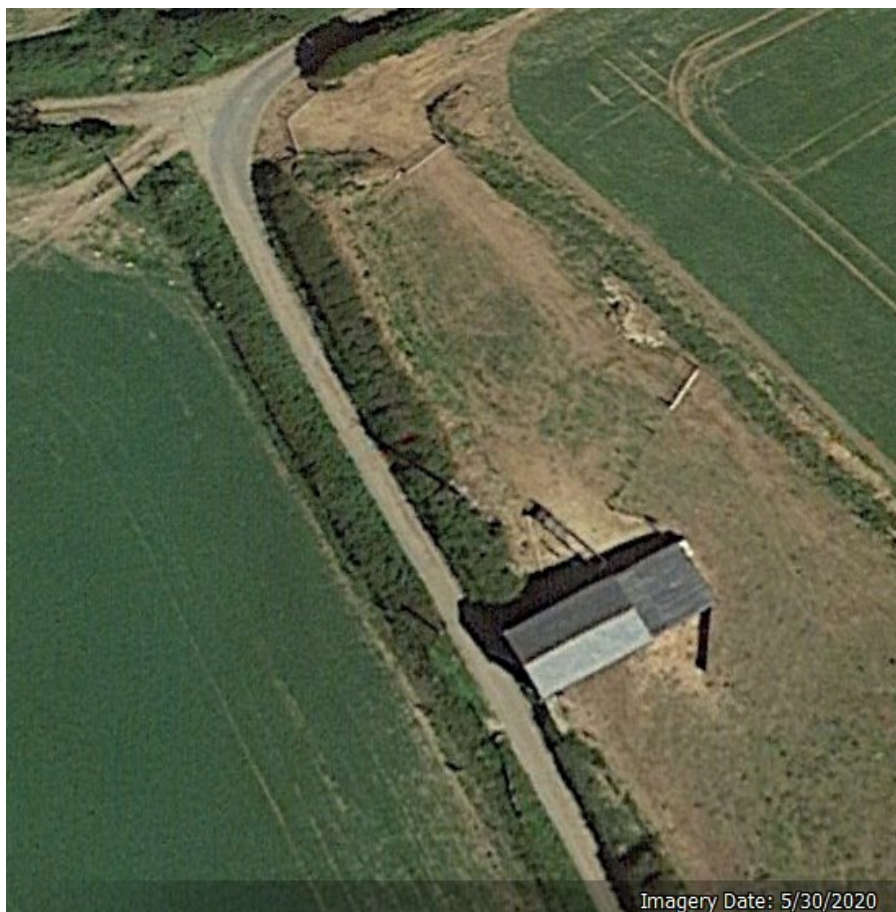


Without too much research, it is obvious to see that the ruin has received new stone work and a new roof between 2002 and 2006.

Google 2006, a new roof structure has been installed.



The shelter on the east elevation appears during the first half of 2020



2024. The area has been cluttered with a shepherd hut, vehicles and various other alien items in the landscape.



It is clearly obvious that the walls supporting the roof have been raised. Green algae is still present on the internal stonework, the result of a long period during which the building was left open to the elements as a ruin, while there is clean stone supporting the raised roof above. A series of new stone pillars have been created along the top of the southern wall.

The Structural Survey, page 6.



Figure 4 – Roof structure in good condition.

It would be incorrect to conclude that this building is in its original form or that it was a two storey structure. The building would not have had a modern toilet.

The Structural Report is silent on the toilet Compartment.



The Barn

Google Street View 2016, the south elevation.



Google 2009, the north elevation with the new roof, stone work and mortar visible.



The roof guttering is an unacceptable installation as it has been fitted to discharge into the bank alongside the structure with the south elevation roof gutter assembled to discharge onto the Byway.



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The north elevation roof gutter discharges straight onto the Byway alongside the wall.



The Public Byway is narrow, below, leaving East Prawle.



Approach to the corner and site entrance (not the historical field entrance).



The building alongside the Public Byway heading towards the National Trust Carpark.



It is worth considering Class Q permitted development rights recently updated.

As of May 21, 2024, the Town and Country Planning Amendment Order (General Permitted Development, etc) 2024 includes changes to Class Q permitted development rights for barn conversions. These changes include:

- Extensions: Single-story extensions can be up to 4 meters deep and high, and can extend to the rear onto existing hardstanding. The extension must be on hard standing that was in place before July

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24, 2023, or if it wasn't there then, it must have been in place for at least 10 years. The extension can't be wider than the existing building, and it can't extend from a wall that faces a public highway.

- **Access: The barn being converted must have suitable access to a public highway.**
- Number of dwellings: Up to 10 dwellings can be created, with a combined maximum of 1,000 square meters. Each dwelling can be up to 150 square meters.
- Cladding: Cladding can be added for necessary operations.

Class Q legislation came into effect in 2014 and sets out the criteria for changing agricultural buildings and land into dwellings. **However, as of May 10, 2024, the government has abandoned plans to allow barn-to-residential conversions in national parks and Areas of Outstanding Natural Beauty (AONBs).**

One of the requirements is that *'The barn being converted must have suitable access to a public highway'*.

The Society can see no reason why that requirement for reasonable access should be dropped because a full planning application is submitted.

The Society noted that the access lane had also to cater for the significant level of unauthorised campsites along the way and found the route to be challenging. It is necessary to reverse for considerable distances when two vehicles meet. Traffic also made it uncomfortable on foot (see previous image of the small vehicle by the barn). The Public Byway links up with the Public Rights of Way footpaths.

The Society make the following points:

- The location is remote from other urbanised locations.



- The location is within the South Devon National Landscape and the Heritage Coast.

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- The location of the building makes it undesirable for the building and surrounding land to change from agricultural use to an urbanised setting and has the potential to cause visual harm to the National Landscape as it sits 625 metres directly north from the former Lloyds Signalling Post.
- While there may be a lack of historic buildings, the area has important heritage history with two signalling points, and wartime artefacts nearby.
- The Public Byway and Public Rights of Way network tranquillity will be eroded by increasing traffic movements to the detriment of walkers travelling between East Prawle and the Heritage Coast along the Public Byway. It is very difficult for walkers to compete with vehicles as the Byway is not wide enough and places to pass are sparsely spaced.
- Dark skies will be further eroded in a new location.
- The proposal fails the 5 tests in the Heritage Coast Policy DEV24.

Policy DEV24

Undeveloped Coast and Heritage Coast

Development which would have a detrimental effect on the undeveloped and unspoilt character, appearance or tranquillity of the Undeveloped Coast, estuaries, and the Heritage Coast will not be permitted except under exceptional circumstances. Development will only be permitted in the Undeveloped Coast where the development:

1. Can demonstrate that it requires a coastal location.
2. It cannot reasonably be located outside the Undeveloped Coast.
3. Protects, maintains and enhances the unique landscape and seascape character and special qualities of the area.
4. Is consistent with policy statements for the local policy unit in the current Shoreline Management Plan.
5. Is consistent with the relevant Heritage Coast objectives, as contained within the relevant AONB Management Plan.

Development for the purposes of agriculture, forestry, public access and enjoyment of the coast and estuaries, or community facilities that meet the objectively assessed needs of the local community, will be supported if it meets the above tests.



The South Devon National Landscape.

The site lies within the South Devon National Landscape.

The Countryside and Rights of Way Act 2000 UK Public General Acts 2000 c. 37 Part IV Section 85 has been amended by the Levelling-up and Regeneration Act 2023.

Part (A1) now states:

*'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority **must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty**.'*

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Natural England have stated* the following while guidance is awaited from DEFRA:

In the meantime, and without prejudicing that guidance, Natural England advises that:

The duty to 'seek to further' is an active duty, not a passive one. Any relevant authority must take all reasonable steps to explore how the statutory purposes of the protected landscape (A National Park, the Broads, or an AONB) can be furthered;

The new duty underlines the importance of avoiding harm to the statutory purposes of protected landscapes but also to seek to further the conservation and enhancement of a protected landscape. That goes beyond mitigation and like for like measures and replacement. A relevant authority must be able to demonstrate with reasoned evidence what measures can be taken to further the statutory purpose.

The proposed measures to further the statutory purposes of a protected landscape, should explore what is possible in addition to avoiding and mitigating the effects of the development, and should be appropriate, proportionate to the type and scale of the development and its implications for the area and effectively secured. Natural England's view is that the proposed measures should align with and help to deliver the aims and objectives of the designated landscape's statutory management plan. The relevant protected landscape team/body should be consulted.

*Advice provided by Natural England to the Lower Thames Crossing DCO Examining Authority on the implications of the new duty to further, Annex 2 of letter dated 15th December 2023.

As previously stated the building is situated 625 metres **directly north** of the former 'Lloyds Signalling Post' now the 'National Coastguard Watch' (red ring in image below).

Image contained in the Design and Access Statement (page 6)



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South Devon National Landscape Management Plan 2019 – 2024

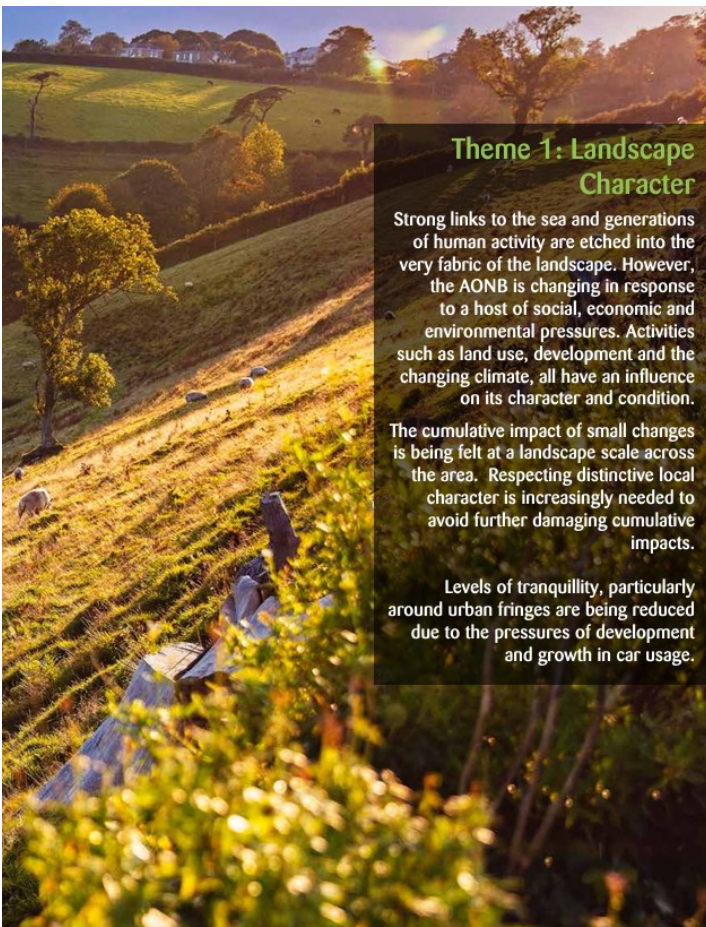
Applicable Policies that the Society consider do not support this proposal.

Ten special qualities summarise the unique 'natural beauty' for which the South Devon AONB is designated as a nationally important protected landscape.

- Fine, undeveloped, wild and rugged coastline
- Ria estuaries (drowned river valleys), steep combs and a network of associated watercourses
- Deeply rural rolling patchwork agricultural landscape
- Deeply incised landscape that is intimate, hidden and secretive away from the plateau tops

- Iconic wide, unspoilt and expansive panoramic views
- A landscape with a rich time depth and a wealth of historic features and cultural associations
- A breadth and depth of significant habitats, species and associated natural events
- An ancient and intricate network of winding lanes, paths and recreational routes

- Areas of high tranquillity, natural nightscapes, distinctive natural soundscapes and visible movement
- A variety in the setting to the AONB formed by the marine environment, Plymouth City, Torbay, market and coastal towns, rural South Hams and southern Dartmoor



Theme 1: Landscape Character

Strong links to the sea and generations of human activity are etched into the very fabric of the landscape. However, the AONB is changing in response to a host of social, economic and environmental pressures. Activities such as land use, development and the changing climate, all have an influence on its character and condition.

The cumulative impact of small changes is being felt at a landscape scale across the area. Respecting distinctive local character is increasingly needed to avoid further damaging cumulative impacts.

Levels of tranquillity, particularly around urban fringes are being reduced due to the pressures of development and growth in car usage.

Key policy objective:

To improve coordination and influence the management of landscape features ensuring they are maintained, enhanced, understood and appreciated.

Lan/P1 Character

The special qualities, distinctive character and key features of the South Devon AONB landscape and South Devon Heritage Coast will be conserved and enhanced.

Lan/P2 Technical assessments

The use of Landscape and Seascape Character Assessments and Historic Landscape and Seascape Characterisation will continue to be advocated so that land use and marine planning and management decisions respect, maintain and where possible enhance landscape character contributing to the special qualities of the South Devon AONB.

Lan/P3 Landscape condition

Opportunities will be sought to strengthen landscape character by improving the condition of existing landscape features in poor condition and reinstating landscape features identified as missing or fragmented.

Lan/P4 Tranquillity

The tranquillity, natural nightscapes and dark skies of the AONB will be enhanced and maintained in a consistent, cross-boundary evidence-based approach.

Lan/P5 Skylines and views

The character of skylines and open views into, within and out of the South Devon AONB will be protected. Suitable alternatives to infrastructure responsible for visual intrusion will be sought together with improvements to reduce the visual impact of unsightly past development.

Lan/P6 Seascape

The open undeveloped seascape seen from the coast forms a defining setting for the South Devon AONB; the long uninterrupted views, wild character and natural horizons will be protected and sustained.

Lan/P7 Setting to the AONB

The deeply rural character of much of the land adjoining the AONB boundary forms an essential setting for the AONB and care will be taken to maintain its quality and character.

Theme 4: Historic environment

People have lived in the area from pre-historic times shaping the landscape with ancient burial mounds, coastal hillforts, historic farmsteads, remote fishing villages and ancient landscape features. Maritime and agricultural heritage is reflected in local culture and traditions often linked to the seasons or historic events.

Work continues to improve the coordination and management of historic environment features throughout the AONB. The AONB Staff Unit and partners work together to ensure they are maintained, enhanced, understood and appreciated. The condition of nationally important Scheduled Monuments, historic features such as field barns and some coastal structures are threatened by factors including cultivation, scrub encroachment, burrowing animals and coastal erosion.

Key policy objective:
To conserve and enhance the AONB's historic features and distinctive vernacular buildings as part of a living and working landscape ensuring mechanisms are in place to secure their continued long-term management and care.

Hist/P1 Cultural and historic environment
The identification, protection and active conservation of the AONB's cultural and historic environment will be promoted and supported.

Hist/P2 A historic environment asset
The South Devon AONB landscape will be regarded as a single unified historic environment asset of national importance.

Hist/P3 Public access
Public access will be encouraged to historic sites that are able to withstand visitor pressure without undue harm to their nature conservation interests and physical features.

Hist/P4 Statutory protection
Statutory protection together with appropriate management will be sought for the most important historic monuments and buildings.

Hist/P5 Technical resources
The use of Historic Landscape and Seascape Characterisation, the Historic Environment Record, Tithe Maps and other tools and information resources will be promoted in order to inform projects, policies and activities.

Hist/P6 Coastal heritage
The conservation of coastal heritage assets will be incorporated into adaptation plans and realignment measures in recognition of their contribution to coastal landscape character.

Hist/P7 Land management
The protection and enhancement of historic environment assets shall be integrated into other planning, coastal and land management initiatives in the AONB in recognition of their contribution to landscape character.

Theme 6: Coast & Marine

The conservation and enhancement of the high quality and internationally significant coastline of the AONB and South Devon Heritage Coast is a priority. The undeveloped coast, inshore waters and wider marine component of the South Devon AONB are considered as one of the special qualities that define the unique natural beauty for which the area is designated as a nationally important protected landscape.

Mar/P1 Coastal character - The tranquil and undeveloped character of the coast will be protected. Opportunities will be sought for improvements in the condition of degraded sites.'

The Society are of the opinion that this development will be damaging to the heritage coast landscape, the South Devon National Landscape, the historical environment, the dark skies, and further add to the erosion of tranquillity and footpath user experience and should be refused.

For and on behalf of the South Hams Society

Richard Howell

Chairman.

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Copy.

Air Ministry
WC2
20 Aug: 1934

347464/34/S.7.(d)

Madam. With reference to your letter of the 31st ult. requesting an account of the loss of naval airship No C.8. on the 9th June 1916. I am directed to inform you that, according to the records of this dept. after the airship left Kingsnorth at 8 pm on the 8th June 1916. no report of her movements was received until she was sighted at 8.5 am the following day. At 10.55 am a further report was received from Prawle Pt. Signal Sta stating that the airship was seen to be in difficulties & nearly down on the water.

Therabouts were immediately sent to patrol vessels in the vicinity to proceed to her assistance & at 11.45 am HMS 'Larne' reached the airship & took her in tow 24 miles South of Start Point., but it was subsequently found impossible to save the a. & she was sunk at 7.16 pm

The only survivor was the W/T. operator who, being a non-swimmer, remained with the A. & was rescued by a French vessel & afterwards transferred to HMS 'Larne'. According to ^{the} evidence of the survivor the three remaining members of the crew, 3/4 hour prior to the arrival of the French vessel, decided to jump aboard as otherwise the A. would have sunk. A thorough search was carried out but no trace could be found of the remainder of the crew.

Yours faithfully
The Hon. Secy. to the Admiralty
The Admiralty, Whitehall, London

I am, Madam

Yours obedient servant
G. Howarth

