PLANNING REF: 3329/25/FUL

DESCRIPTION: Extension to existing marine retail unit to provide a new showroom & cafe on existing boat storage yard & demolition of part of building

ADDRESS: Wills Marine Ltd, The Promenade, Kingsbridge, TQ7 1JF

5th January 2026

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 wishes to comment on this application on behalf of one of our members.

The Society has reviewed the previous planning permissions for the location - 28/1382/00/F, as amended by applications 28/1315/01/F, 28/1990/02/F, and 28/0797/04/F. We have also previously reviewed 28/1381/00/CA for the demolition of a South West Water Depot building.

That review raises several questions with regards to the documentation included in the current proposal.

It is our belief that the services plan submitted by South West Water may be incorrect with regards to the surface water drain route serving the Saffron Park development.

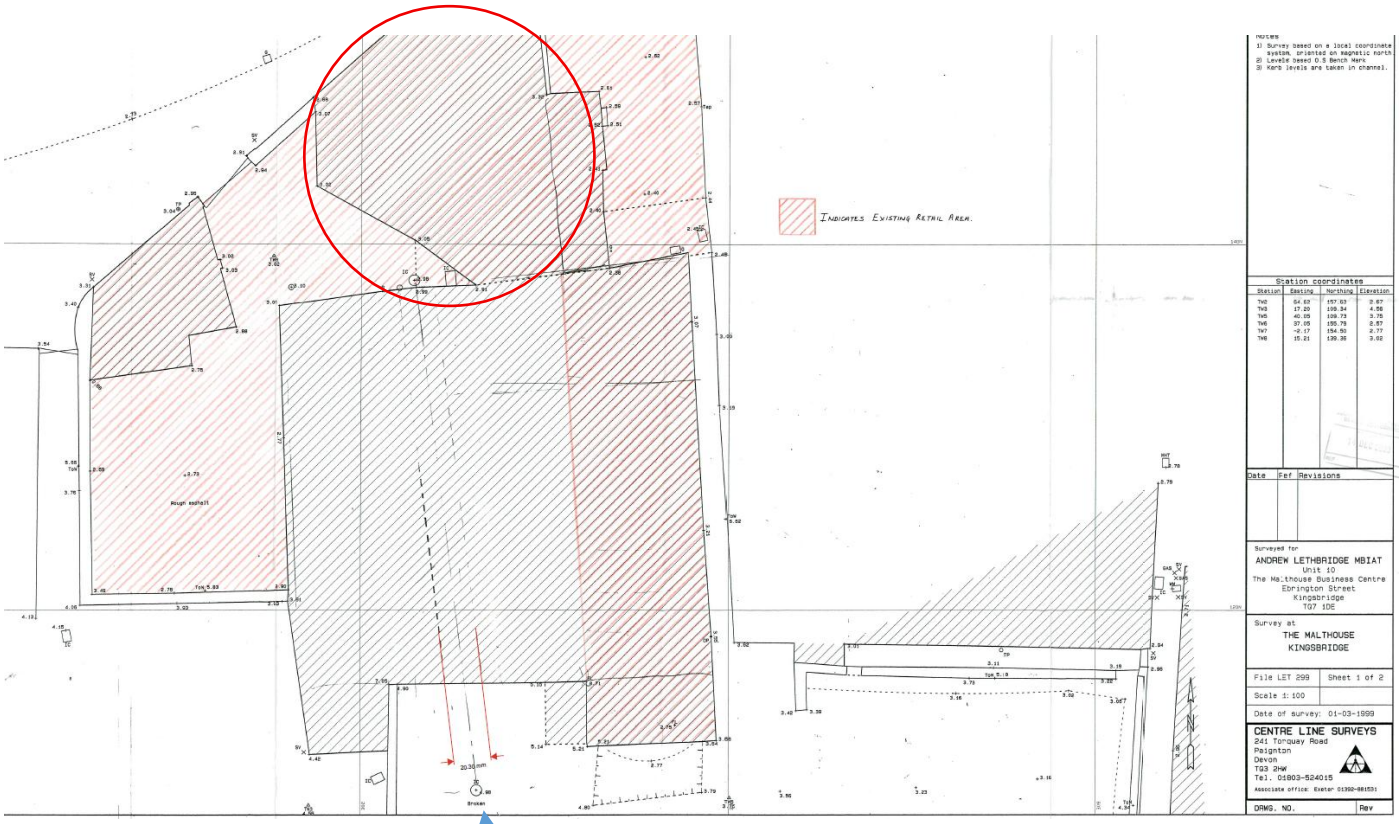
The courtyard width on the submitted drawing may be incorrectly overstated, and it appears that the flat roof section of the proposed building is 650mm higher than the 1.8m high stone wall (reported to be 1.6m). This is considered to impact on the accuracy of the daylight and sunlight report.

Separately the Heritage statement is inaccurate in the timing of building removal and the setting of the Listed Building (Pindar Lodge) and that of the Conservation Area.

The Saffron Park surface water drain route.

The 1999 site survey shows the route through the former South West Water Authority Kingsbridge Depot.

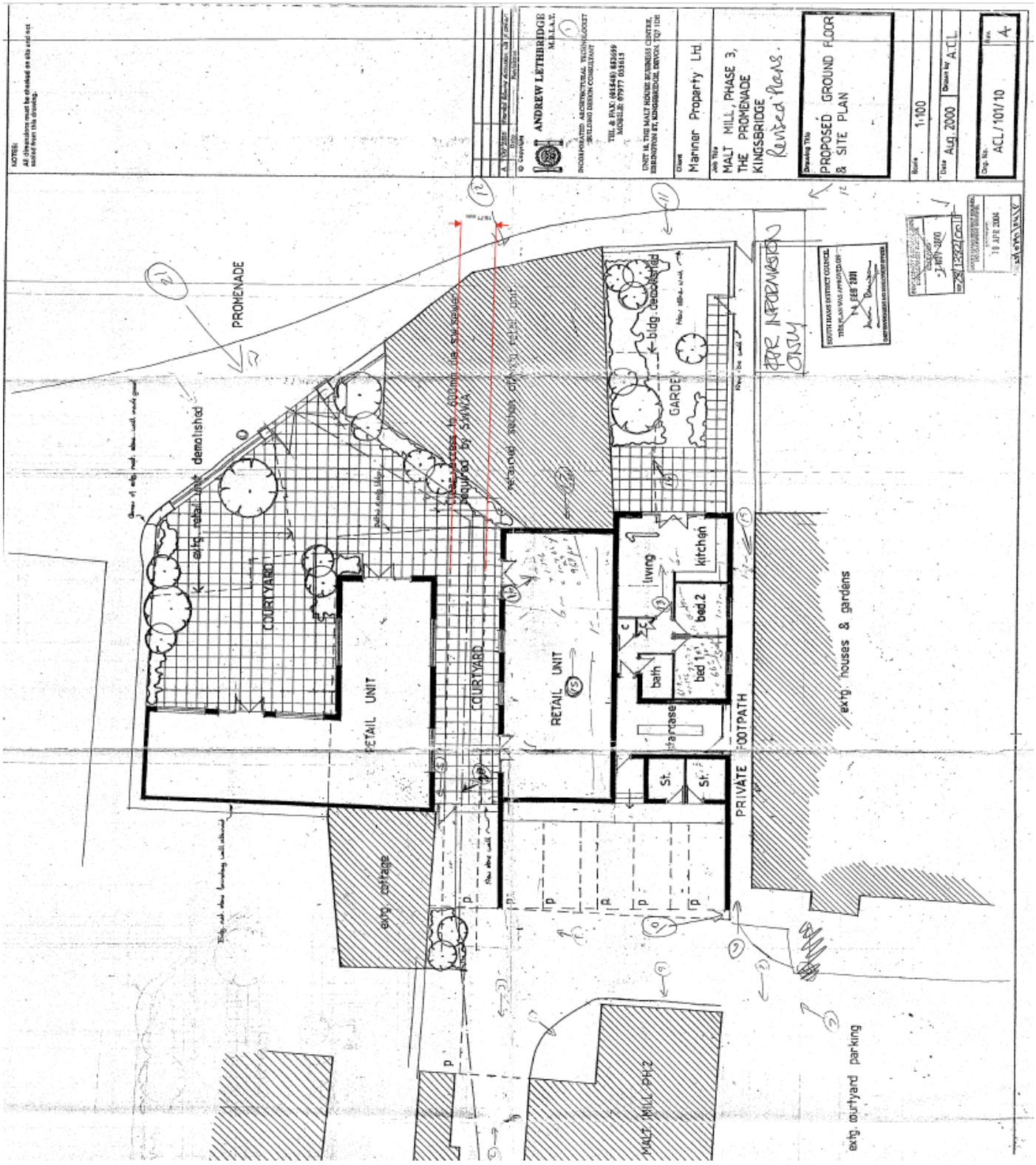
Wills Marine site is at the top (red ring).



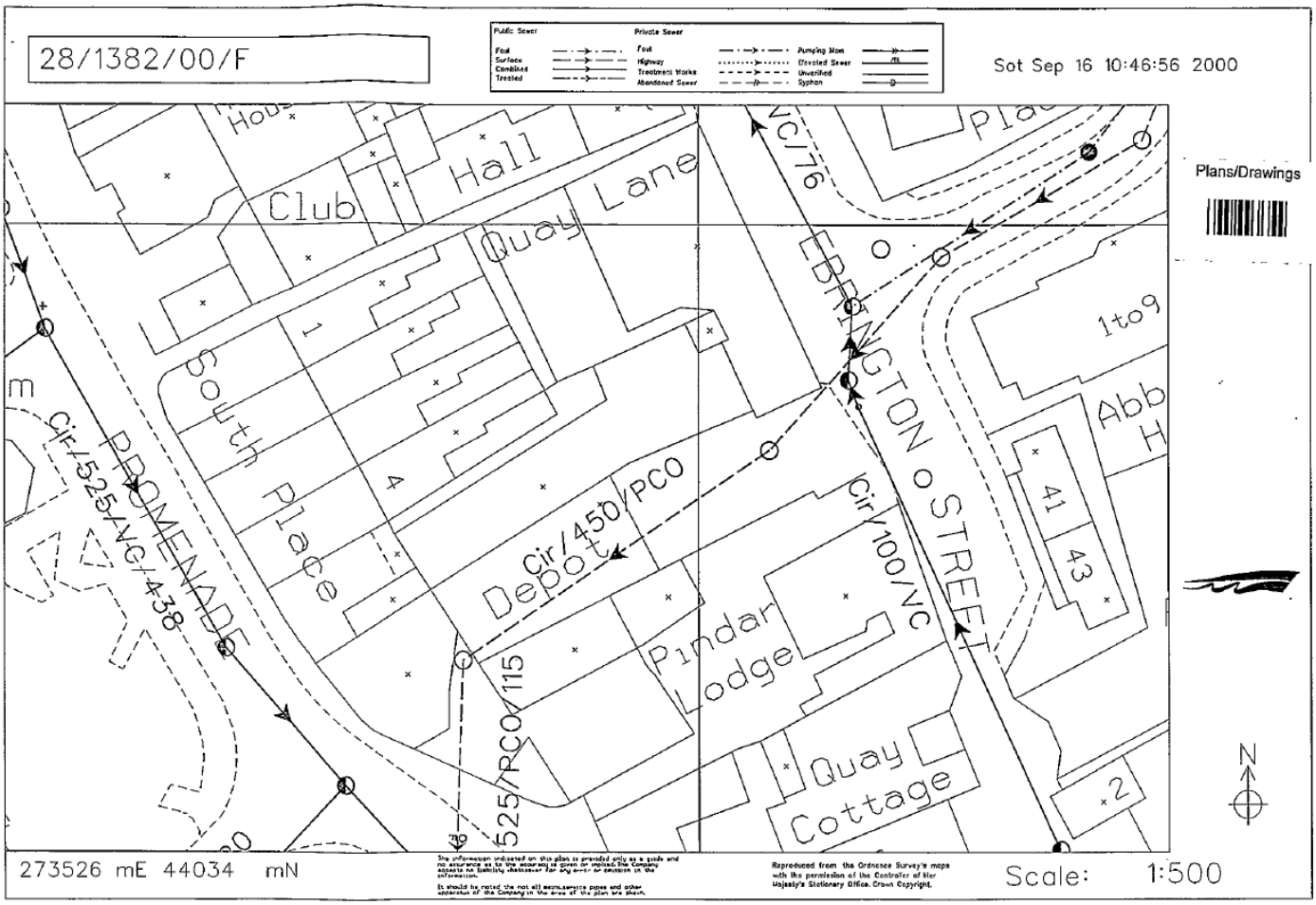
Direction of the drain to the estuary is illustrated with the blue arrow.

(Red line measurement added by the Society)

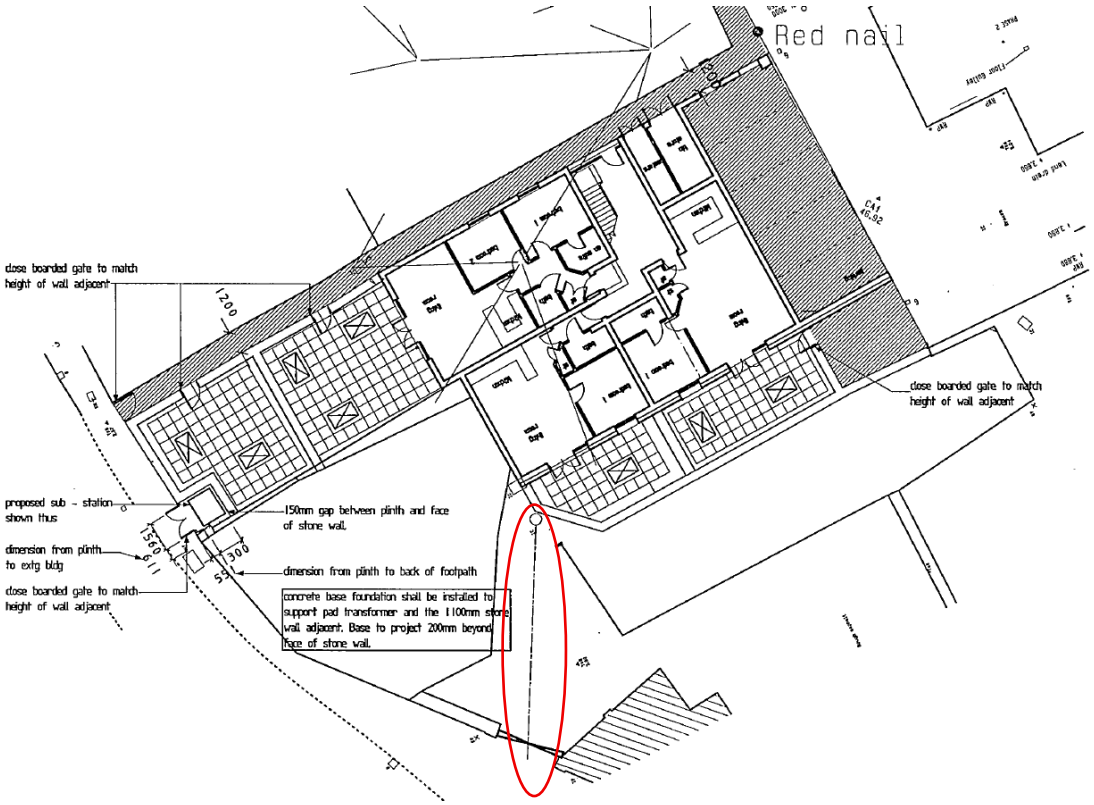
The planning permission for the two retail units (that was not implemented) shows a clear access route necessary for a surface water drain required the by SWWA between the two retail units (red line measurement added by the Society).



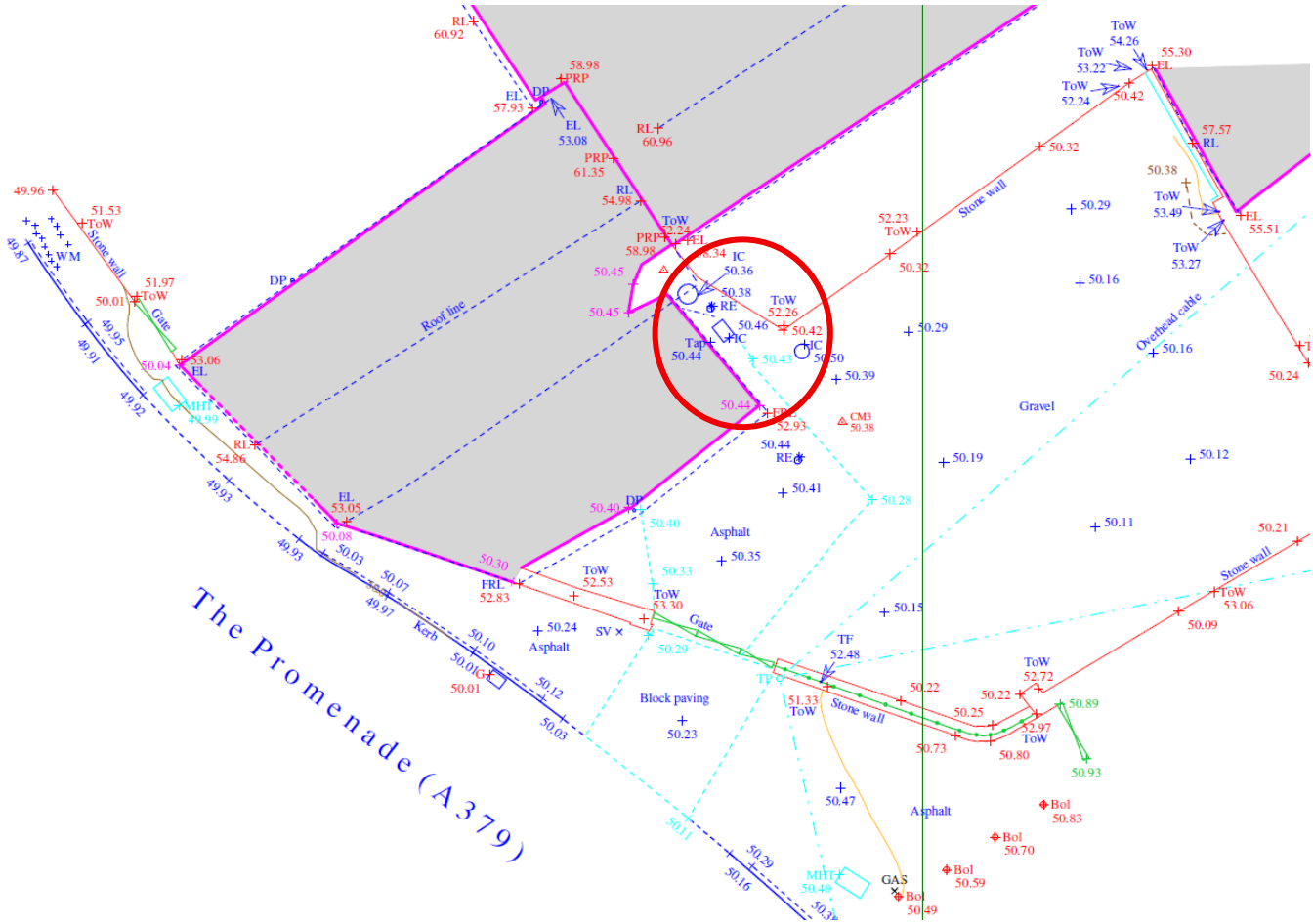
The 1999 SWW plan shows the route through the depot to the north of the Pindar Lodge Coach House.



The 'as built' flats drawing – the drain runs through the court yards. The manhole and drain to the Promenade inside the red ring.



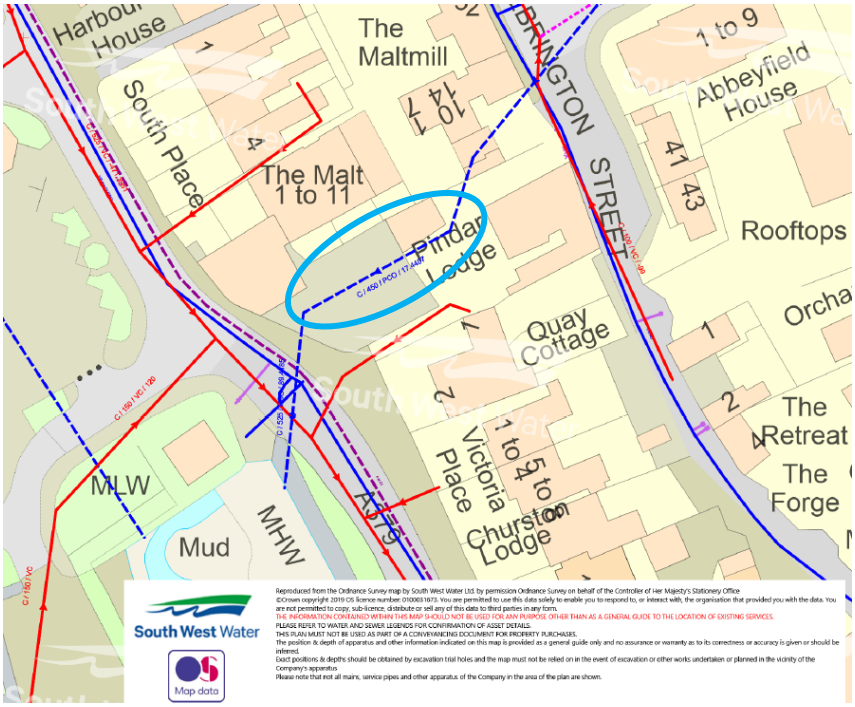
The application's submitted 'existing site plan' only illustrates manhole inspection covers in the location of the previously recorded surface water drain location.



Route of Saffron Park's surface water drain. Image date 2nd December 2023 at 1050 am.

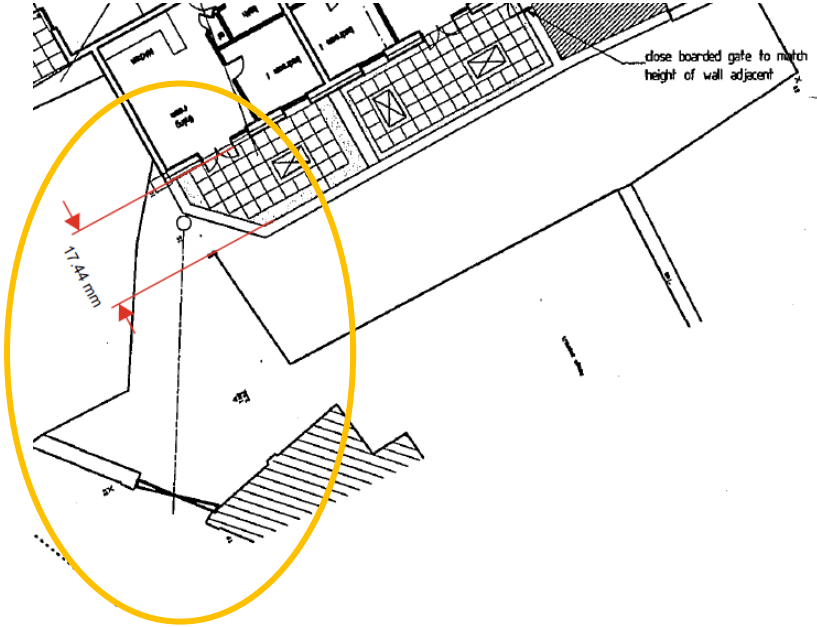


The Society believe this surface water drain route to be incorrect (blue ring).



The applicants submitted drawings illustrate the SWW plan route and we believe this route to be incorrect. Pindar Lodge HM Land Registry title register contains no reference to any easement.

The plan for the flats built in 2004 show the courtyard to be 3.5m wide. This may be incorrect, but should be confirmed.



BOUNDARY WALL TO COURTYARD

BOUNDARY WALL TO GARD UNIT 1 AND COMMON ARE

tarmac to paths and parking areas

timber planters to detail

75mm down duck egg laid loose

600x600mm pre cast conc paving

NO.	REVISION	DATE
A	Gate's added and notes to suit	July 04

THIS DRAWING IS THE COPYRIGHT OF SAVAGE HAYWARD WHOLE OR PART IS FORBIDDEN WITHOUT PRIOR WRITTEN P DO NOT SCALE FROM DRAWING AND ONLY FIGURE DIMENSIO

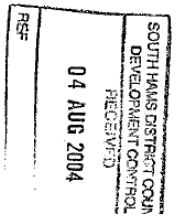
PROJECT
Evans Bros.
Proposed Apartments
The Malt Mill Kingsbrid

DRAWING
EXTERNAL WORKS

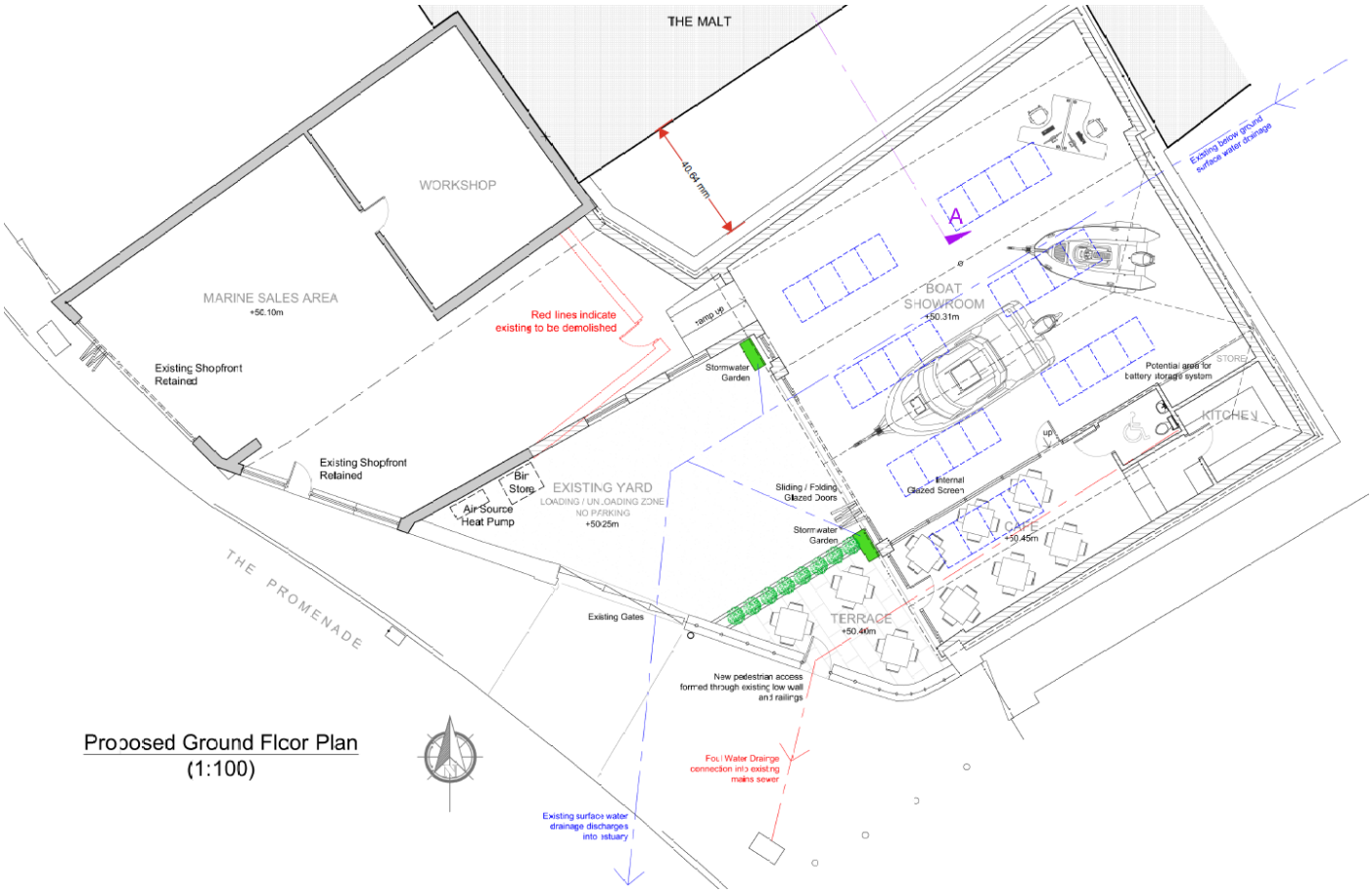
DATE
JUNE 2004

CODE
04 51 19 A

SCALE
1 : 200 1 : 20



Conversely the submitted drawing shows the courtyard to be 4m wide.



Proposed Ground Floor Plan
(1:100)

PLANNING

B	11.12.25	Yard noted as 'Loading / Unloading Zone - No Parking'	MD
A	02.09.25	Northern part of roof changed from pitched to flat	MD
		REVISIONS	

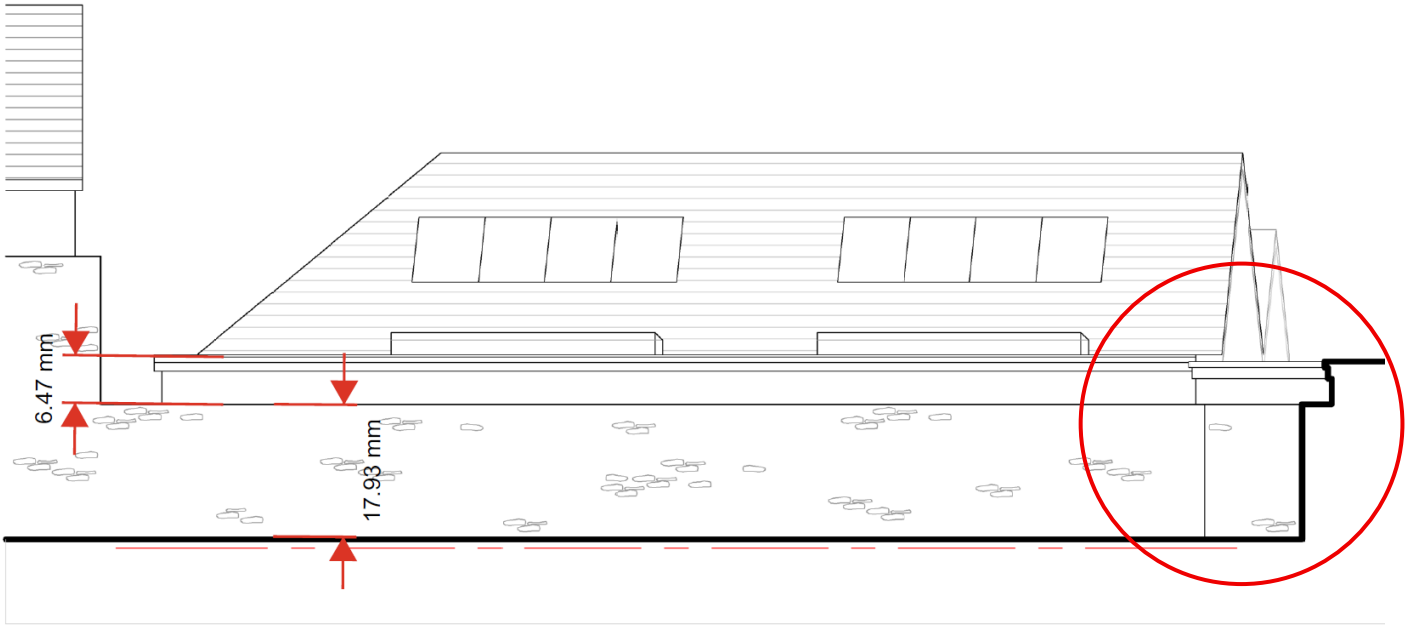
D2O Architects

Northside, Wakeham New Barn
Aveton Gifford
Kingsbridge TQ7 4NE
07971 976707

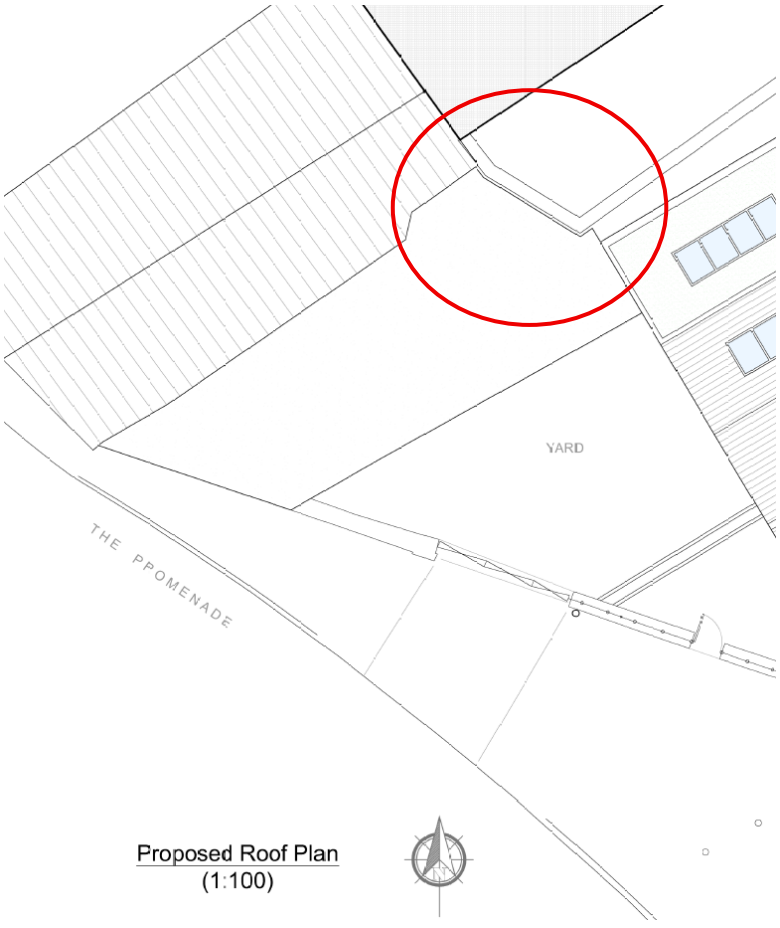
client: Wills Marine	date: Nov 2023
project: Wills Marine, The Quay, Kingsbridge, TQ7 1JF	scale: 1:100 @ A1
drawing: Proposed Ground Floor Plan	drawn: MD
drawing no.: 2738 / 22	rev.: B

40.10 mm
0 Metres 5
Scale 1:100

The flat roof section is illustrated to be 650mm higher than the 1.8m high stone boundary wall stated to be 1.6m.



Proposed Side (North West) Part Elevation (1:100)



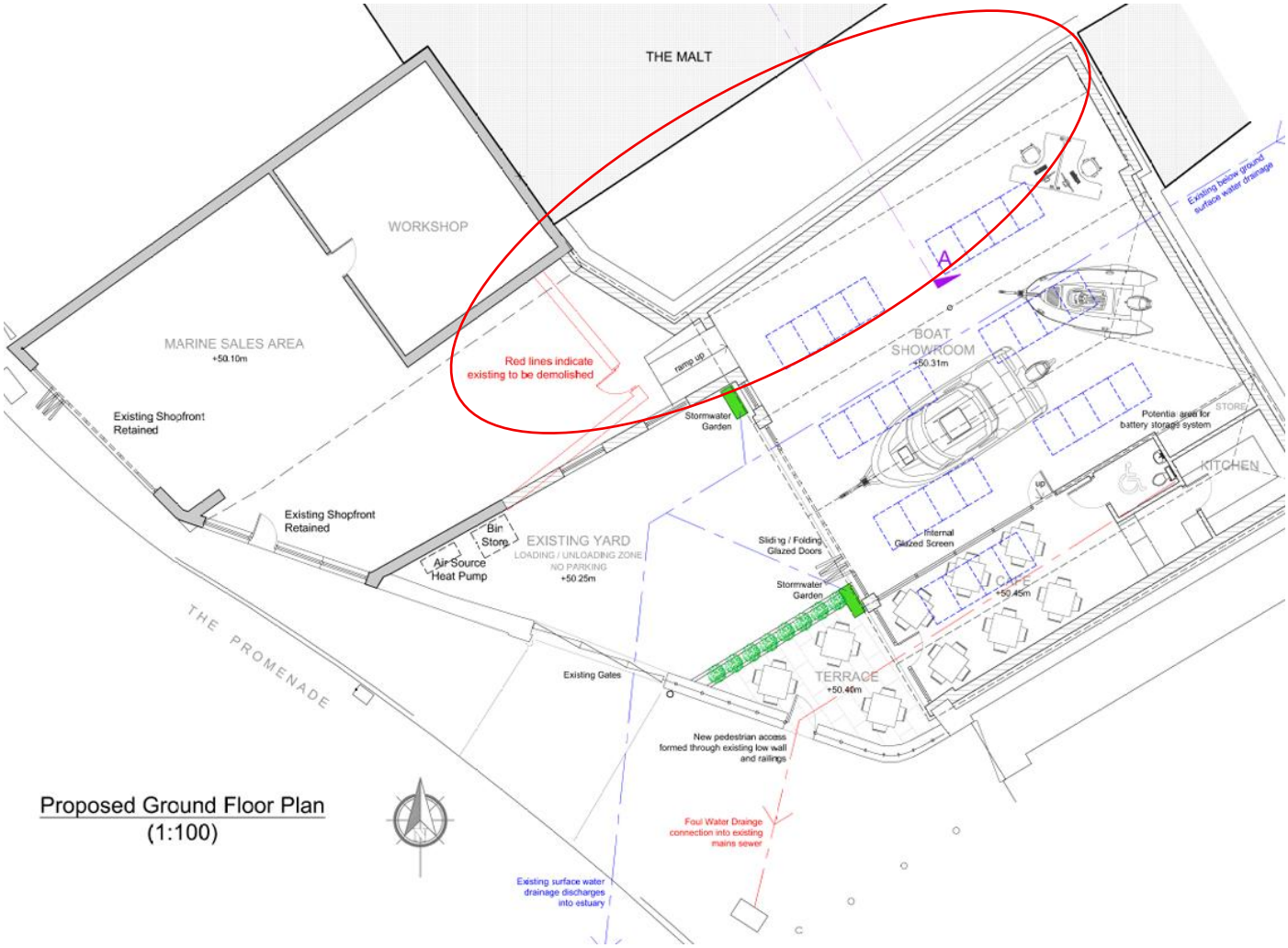
Proposed Roof Plan
(1:100)

The area in the red ring is tight to the boundary wall, higher than the existing stone wall and to the south.

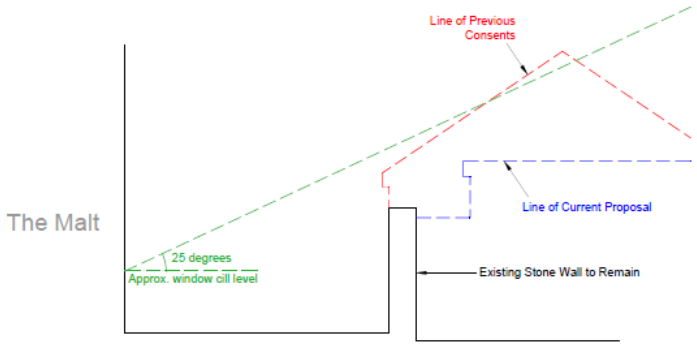
The Society considers this to be unacceptable.

It should be noted that there has previously been a medical evacuation on a stretcher that required fire brigade assistance to enable the person to be extracted over this wall.

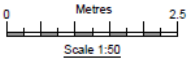
This plan shows the building wall tight to the stone boundary wall. On the roof plan, there is a gap from the stone wall to the roof. The walls of the new build surround the boundary wall.



The Society finds this submission disingenuous. The previous consent was for two ground floor retail units (28/1382/00/F). The application was superseded by a planning consent for two 'one bedroom' flats and the second retail unit was removed from the plan.



Section A-A (1:50)



PLANNING

B	16.10.25	25 degree line shown from window of neighbouring property	MD
A	02.09.25	Proposed pitched roof changed to flat roof	MD
		REVISIONS	

D2O Architects

Northside, Wakeham New Barn 07971 976707
Aveton Gifford
Kingsbridge TQ7 4NE

client: Wills Marine | date: Nov 2023

project: Wills Marine, The Quay, Kingsbridge, TQ7 1JF | scale: 1:50 @ A3

drawing: Section A-A Through North East Boundary | drawn: MD

drawing no.: 2738.25 | rev.: B

'The Anstey Horne & Co. Ltd. daylight and sunlight note on behalf Wills Marine'

Here it should be noted that the London Plan has no relevance to the South Hams, and it is a disappointing document.

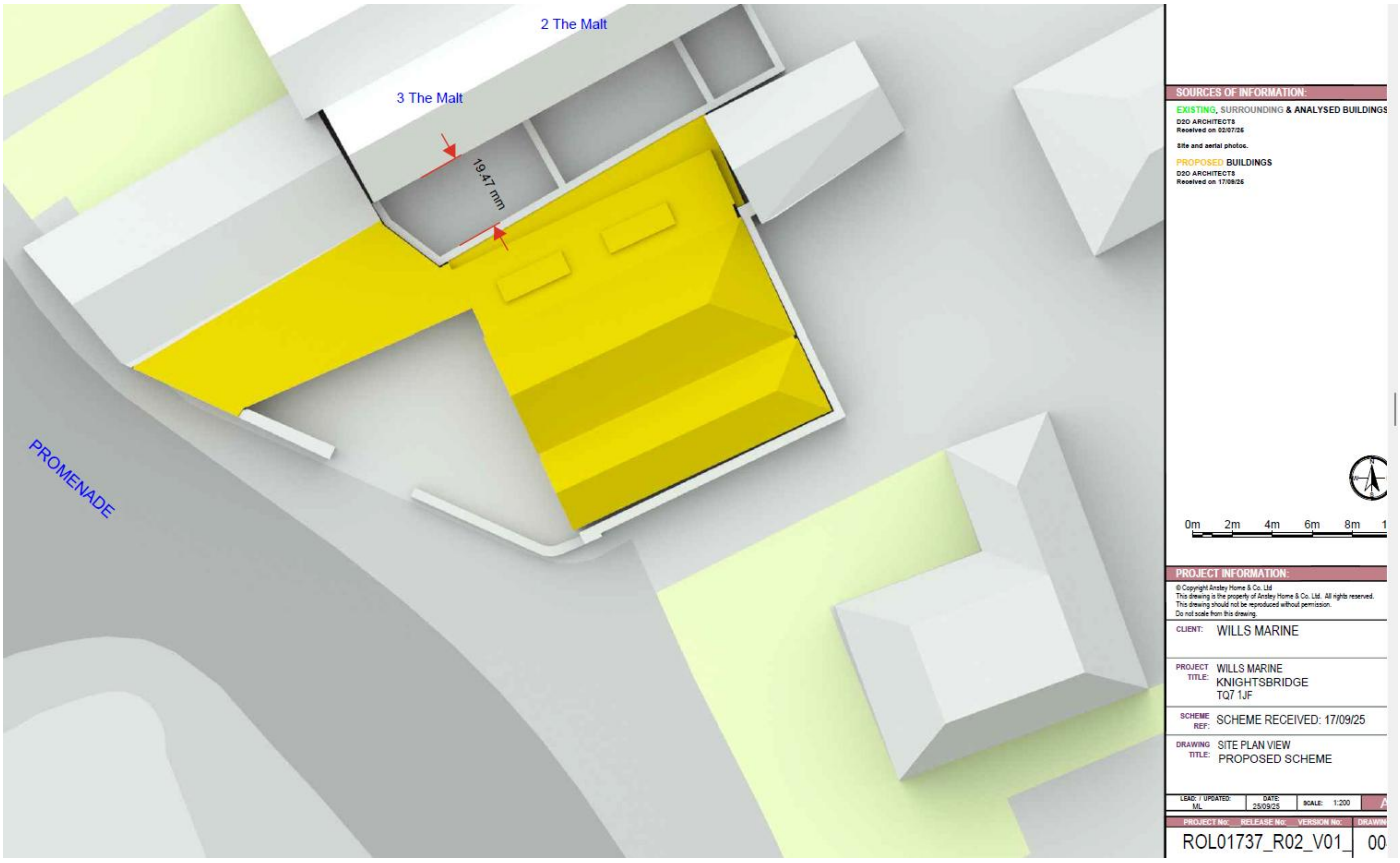
'In terms of regional planning policy and guidance, the Mayor of London's London Plan March 2021 sets out the spatial development strategy for London. It forms part of the development plan for Greater London, along with local plans of the London boroughs'.

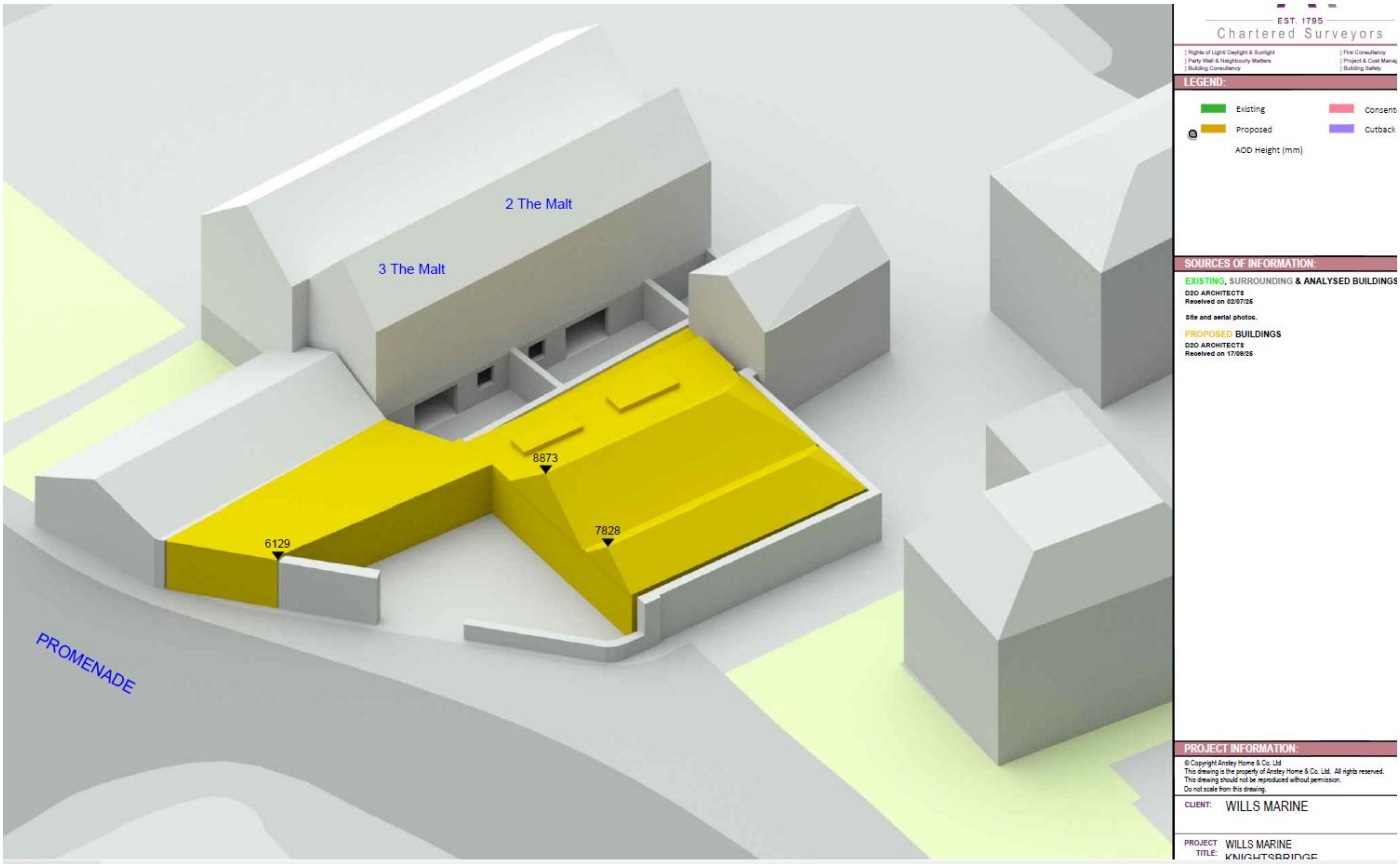
The loss of light to the expected level must be unacceptable:

'However, R1 (the Living-Kitchen-Dining / LKD room) falls short, ***retaining only 42% of its former value*** *(0.42). This room currently benefits from high levels of daylight due to the adjacent undeveloped site and is therefore particularly sensitive to change. In addition, it is a deep room with its only source of daylight being a single window facing the proposed development, contributing to its lower daylight performance in the proposed condition'.*

'For DD, R2 (a bedroom) meets the BRE guideline, retaining 87% of its former value (0.87). However, R1 (the LKD room) falls short, retaining only 49% of its former value (0.49). Like its counterpart in 2 The Malt, this LKD room currently benefits from high daylight levels due to the adjacent undeveloped site and is more susceptible to reductions in daylight. It is also a particularly deep room with only one window facing the development site, which limits its daylight resilience'.

In addition to the loss of light the courtyard width may be overstated and it is not obvious how SWW would repair the Saffron Park surface water sewer if required.





The arial image below shows the two ground floor flats. The Society are of the opinion that surrounding the stone boundary wall with a commercial business building to the southern elevation will have a damaging impact on the residential outlook for the residents.



'DEV1.1 – Impact of new development

3.5 DEV1.1 aims to ensure new development provides for satisfactory daylight, sunlight, outlook, privacy and the protection from noise, vibration and odour disturbance for both new and existing residents, workers and visitors.

Impact on neighbours

13.65 Fences and walls should be designed and located so that they do not unreasonably restrict light entering a neighbouring property or have an unacceptable effect on outlook'.

The Heritage Statement.

Pindar Lodge was listed on the 31st October 1972.

It is important to correctly understand the time of its listing.

The Heritage Statement:

3.16 As the estuary gradually silted up the point of high tide was lowered, and the market square was subsequently built across the northern end of the quay in the late 1950s. This area was then used as a carpark (Figure 3.8).

The head of the Estuary was filled in January 1950.

it was not until Tuesday, December, 19th, 1893, that the first train was actually run.

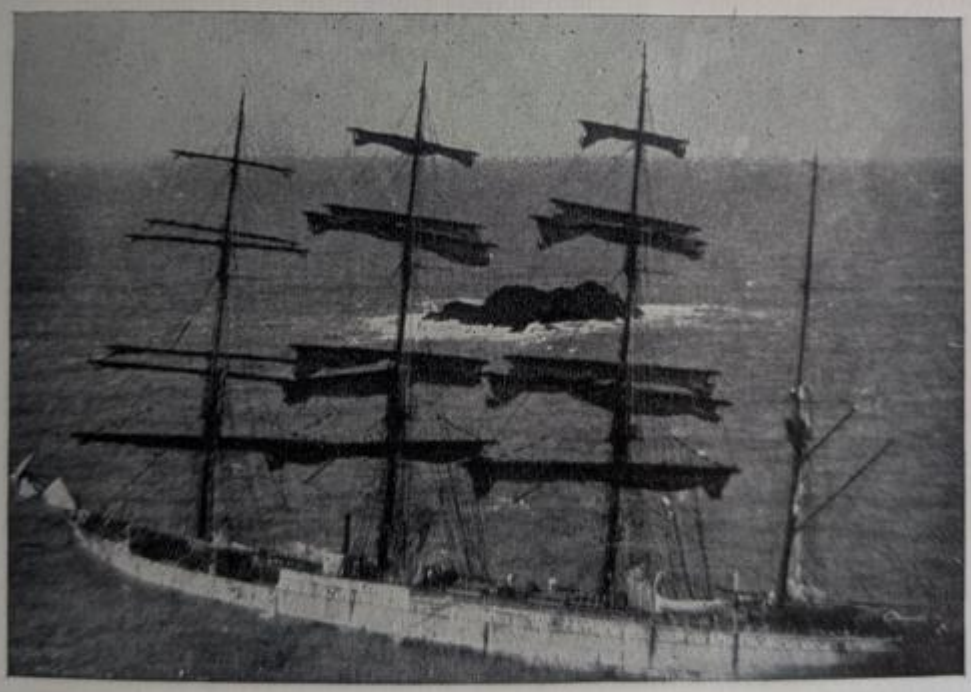
Kingsbridge and Dodbrooke parishes united into one parish for civil purposes, March 25th.

1900 (about). Mill Street had formerly been the only access to Kingsbridge from the Salcombe road. W. R. Ilbert, Esq., then owner of Quay House, shortly after the turn of this century had Ilbert Road constructed and presented it to the town. This is the stretch of road from the Quay to the point where Mill Street and the old Salcombe road (from Ticket Wood) join the present Kingsbridge—Salcombe road.

1922. Present market opposite old Rope Walk erected.

1944. Two hundred farms evacuated in Stokenham and Slapton areas to serve as a training ground for U.S. troops.

1950. Head of Estuary filled in.



THE WRECK OF THE HERZOGIN CECILIE
IN SOAR MILL COVE

Charity No 263985
Registered Address: 20 Highfield Drive, Kingsbridge, Devon TQ7 1JR
www.southhamssociety.org | www.facebook.com/SouthHamsSociety/

The Heritage Statement:

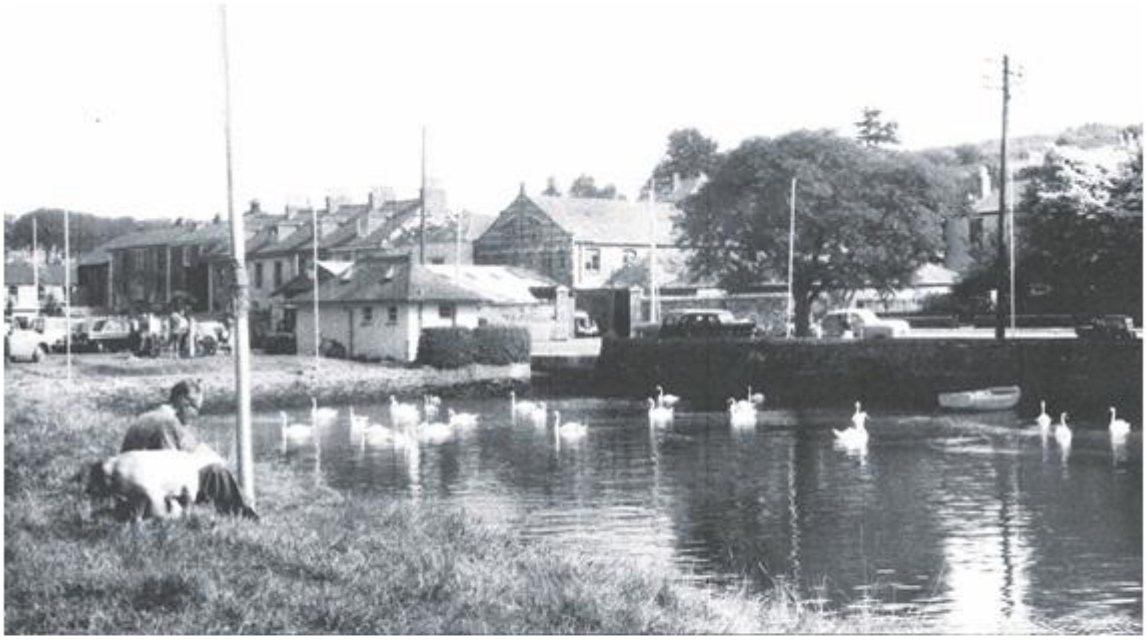
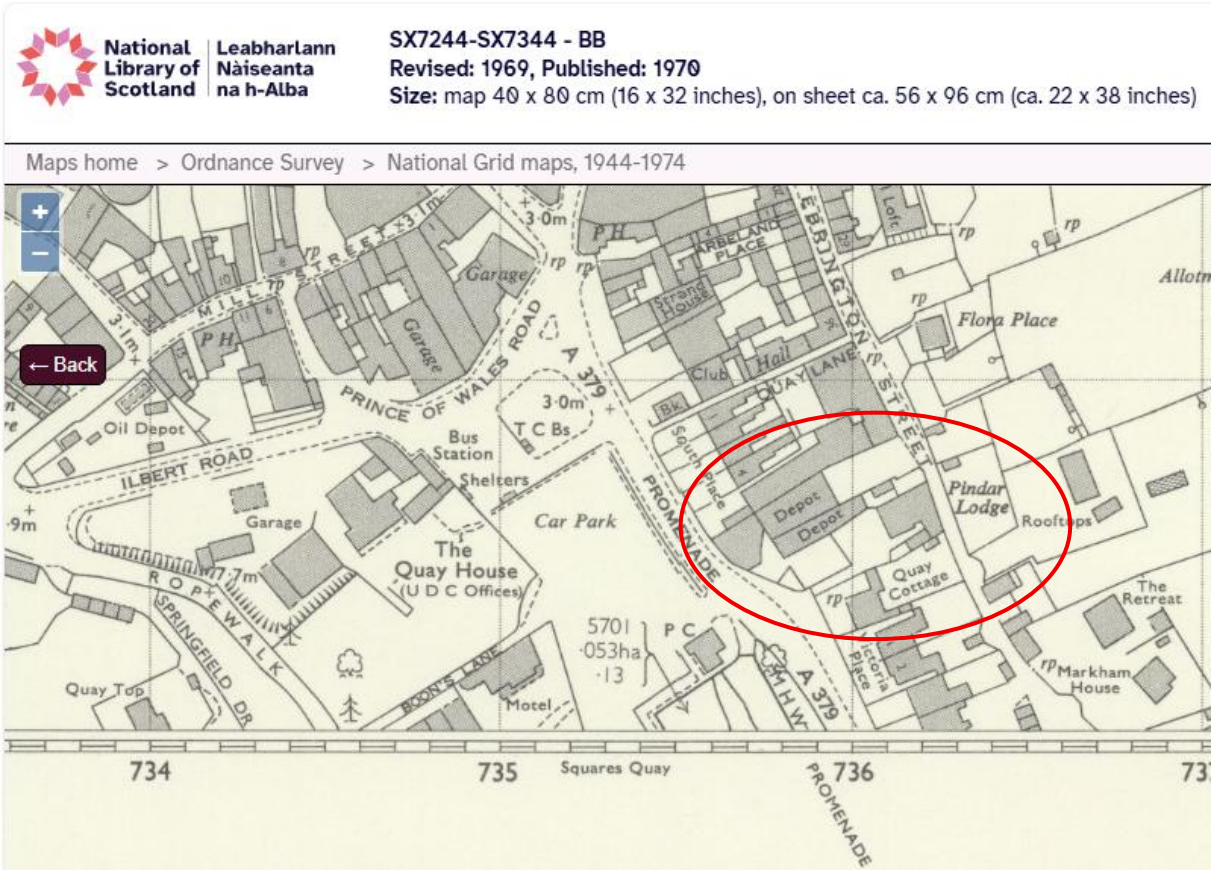


Figure 3.8: Photograph of the quay (The Francis Frith Collection, 1960).

3.18 The wall fronting The Promenade was demolished in the mid-1970s, after which another shop was erected in its place. Two of the three hipped roofed warehouses were also demolished at this time, leaving only the northern most warehouse remaining (Figure 3.9). The external walls of the demolished warehouses buildings were retained, and these now form the external boundary walls to the south and east of the Site.

This map records the area published in 1970, two years before the listing.



Between the late sixties to late eighties, the site remained largely unchanged.

The following image was taken in 1971.



This image was taken 1987-1989 and records the site to be the same as it was when Pindar Lodge was listed.



These images demonstrate paragraph 4.15 of the Heritage Statement is incorrect. It states:

4.15 The setting of Pindar Lodge has changed considerably over the last 200 years, particularly due to the commercial development of Kingsbridge and the use of the quay for trade throughout the 19th century. This included the development of the three (now demolished) pitched roof warehouses on the Site which stood directly in front of the property for approximately 100 years, and which were present at the time of listing in October 1972.

However, prior to the listing, only one building remained to the side of Pindar Lodge.

And section 4.33 of the Historic Statement is also incorrect.

4.33 The Site is located on the edge of the conservation area, within this quayside region. The existing frontage to the workshop building was in situ when the conservation area was first designated in 1972, with the adjoining shop erected shortly after. The existing buildings are of modern construction but are important to the morphology of the conservation area, illustrative of the organic growth of the quayside building pattern to facilitate increased commerce. The boat yard somewhat detracts from this morphology as it is an empty gap in the otherwise busy frontage of The Promenade.



Figure 5.2: Proposed front (south west) elevation.

These paragraphs are incorrect as the previous images, and the OS map confirms. The buildings were removed prior to both the Conservation and Pindar Lodge listings.

5.10 Indeed the 20th century photographs suggest that the historic warehouses were still in situ when Pindar Lodge, alongside the other buildings in the group, were assessed for listing shortly before October 1972. It can therefore be concluded that the current prominence of Pindar Lodge within the townscape is not essential to experiencing its contribution to the group, and more so due to the plain nature of this front elevation. With the new building installed, Pindar Lodge will still be relatively prominent within the townscape due to its elevated position relative to the quayside.

6.5 The most substantial change resulting from the proposals would be that to the setting of Pindar Lodge. When the Lodge was first constructed its east side was fronted only by a grassed lawn, which afforded unobstructed views of the quay. These views were impeded by the erection of three hipped warehouses in the late 19th century, which remained on the Site for around 100 years, until they were demolished leaving only the north, east and south walls at varying heights. These walls demarcate the Site from the land now owned by Pindar Lodge, leaving the two to be read as very separate properties with little visual connection between Pindar Lodge and the quay. Although the proposals would obscure Pindar Lodge in direct views from The Promenade, the design works to imitate the historic warehouses that previously occupied the Site, and which were in situ when the building was assessed for listing. As such it is considered that the proposals would have a neutral impact on the significance of the heritage asset and would not detract from its group value.

It follows that this conclusion follows the incorrect factual evidence. The 1970 edition OS map should have been identified.

6.6 It is considered that the effects of the proposals will not meet the threshold of less than substantial harm in terms of paragraph 208 of the NPPF 2023, and will accord with the requirements of local policy contained in the Plymouth and South West Devon Joint Local Plan 2014-2034 (2019).

The Society is of the opinion that the proposed buildings bring substantial change to the frontage of the listed building as seen from the Promenade while the development proposal will harm the Conservation Area and impact on the residential homes.

Consequently, the Society is of the opinion that the application should be refused.

For and on behalf of the South Hams Society,

Leslie Pengelly
Planning Lead.