



**PLANNING REF: 3335/21/FUL**

**DESCRIPTION: Construction of 125 homes, commercial business units, landscaped parkland, community boat storage/parking, allotments, improvements to existing permissive pathway and public footway, enhancement of vehicular access and associated infrastructure and landscaping.**

**ADDRESS: Proposed Development Site at SX 566 494, Land West of Collaton Park, Newton Ferrers.**

13<sup>th</sup> April 2022

## **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 regrets finding it necessary to be writing for the third time regarding this planning application.

Further information has been supplied in an attempt to win the argument of development over the district councils statutory duty to '*conserve and enhance*' the South Devon Area of Outstanding Natural Beauty.

The AONB's Unit's experts and the District Councils Landscape Specialist have written to object to this proposal and the Society supports that independent and District Council specialist expert opinion.

The Landmark Practice have submitted another landscape document in support of the proposal. It is extremely disappointing to see the following errors in their documents when the documents are receiving multiple written proof checking.

W: <https://southhamssociety.org/> FB: <https://www.facebook.com/South.Hams.Society/>

Charity number: 263985

Registered address: Higher Norris Farm, North Huish, South Brent, TQ10 9NL



**Page 1:**

- 1.2. The addendum draws upon information provided within published Landscape Character Assessments (including the Devon Landscape Character Assessment and the South Downs AONB Management Plan and its Annexes), where relevant, to identify distinctive settlement patterns and demonstrate the suitability of the application site and the settlement pattern being proposed (see **Plate 1**), in this landscape context.

**Page 3:**

**The South Downs Area of Outstanding Natural Beauty Management Plan (SD AONB) 2019-2024 and associated Annexes**

- 2.15. In the main body of the SD AONB Management Plan Part 1 Strategy settlement form and pattern the following reference under themes is noteworthy:

**Page 4:**

**History in the Landscape: An Historic Environment Summary of the South Downs AONB, October 2013**

- 2.25. The above document was prepared to provide a summary of the historic environment interest of the South Devon AONB. In Section 5, which focuses on settlement, reference is made to settlement form varying considerably with the spatial variation dictated by topography. The document at bullet 2 states that:

It is hard to understand how an organisation that submits supporting evidence for a planning application can produce a document with text, including bold title headings describing the South Devon Area of Outstanding Natural Beauty as the SOUTH DOWNS Area of Outstanding Natural Beauty.

Worse the South Downs Area of Outstanding Natural Beauty was accredited National Park status in 2011 and is far larger than the South Devon Area of Outstanding Natural Beauty.

This is an inexcusable error.

The Landmark Practice's updated document of an earlier document that also made the same sloppy mistake three times despite being checked and checked again.

Referring to the historic environment, Collaton Park has been compared to the hamlets of BATTISBOROUGH CROSS (that includes North Battisborough Farm), ST ANN'S CHAPEL along with the village of KINGSTON.

All the communities listed have existed for a considerable time.

Collaton Park has no historical context as a historic community, but as accommodation built for RAF base staff in the 1960's.

**W:** <https://southhamssociety.org/> **FB:** <https://www.facebook.com/South.Hams.Society/>

**Charity number: 263985**

**Registered address: Higher Norris Farm, North Huish, South Brent, TQ10 9NL**



Referring to the conclusions on page 5.

## Conclusions

- 3.1. The above provides published evidence for the presence of a distinctive pattern of nucleated settlement, set back from the coast, associated with the edges of combes and/or crossroads. Battisborough Cross is the closest example (see **Plate 2**) but there are others to the east in the same LCA, at a similar elevation, including Kingston and St Ann's Chapel (see **Plates 3, 4, 5, 6 and 7**).

Kingston was a relatively large village 140 years ago and bears no relation to Collaton Cross where no community existed.

St Ann's Chapel is evidenced as having Neolithic origins and again is not historically comparable.

North Battisborough Farm / Battisborough Cross has historic buildings dating back to the mid 1700's.

The Society does not consider Collaton Cross to be historically comparable.

- 3.2. Published landscape character strategies and guidelines identify a need for protecting the distinctive sparse clustered settlement pattern (which in this locality includes nucleated hamlets and villages on the edges of combes or at crossroads back from the coast), whilst resisting 'further spread or coalescence of settlements.' Also, the published guidelines identify a need for suitable and sustainable locations to accommodate growth, that avoid prominent skylines, protect rural lanes, protect tranquillity and dark skies and utilise sympathetic form and materials. A settlement location on a primary route provides an opportunity for more sustainable public transport options and reduced dependence on car travel within the SD AONB.

The Society cannot agree with this assessment. Collaton Cross is not a hamlet and has no church which would be expected in an English village.

The site is not on a primary route as classified by the County Council (A class road), but on a secondary class B road with limited public transport.

This proposal fails to be supported by the Devon landscape character strategy and guidelines which are as follows.

W: <https://southhamsociety.org/> FB: <https://www.facebook.com/South.Hams.Society/>

Charity number: 263985

Registered address: Higher Norris Farm, North Huish, South Brent, TQ10 9NL



## LCT 1B: Open coastal plateaux

### Overall Landscape Strategy

To protect the open, undeveloped character of the coastal plateaux with expansive sea views and high levels of tranquillity. Distinctive woodlands in sheltered coastal combs are managed (including for wood fuel) and coastal habitats are traditionally grazed. The ever-changing coastline is strengthened and prepared for the future effects of climate change.

### Landscape Guidelines

- Manage and protect the landscape's **network of hedgerows** and characteristic dwarf hedgerow trees, replanting ageing or diseased specimens (with climate hardy species) to ensure the future survival of these characteristic features.
- Manage nationally important **coastal habitats**, including coastal heath and maritime grasslands, through supporting a continuation of extensive grazing at appropriate levels. Re-link sites where feasible and provide a buffer between cliffs and improved grassland.
- Plan for the impacts of a **changing climate on the coastline**, allowing natural processes to take place whilst considering how habitats and the South West Coast Path can be expanded or relocated taking account of coastal squeeze.
- Protect and appropriately manage the landscape's **archaeological heritage**, particularly features associated with defence and sea trade.
- Protect the **historic settlement pattern** by encouraging the sensitive location of new farm buildings away from open skylines, ensuring that any new development incorporates local vernacular building styles of whitewash, local stone and thatch wherever possible (whilst seeking to incorporate sustainable and low carbon building construction and design).
- Plan for the **growth of major settlements** adjacent to this landscape type (Plymouth and Dartmouth), aiming to accommodate new development sensitively within the landscape through appropriate siting, planting and green infrastructure provision.
- Manage the landscape's **popularity for recreation**, encouraging the use of existing facilities and South West Coast Path whilst providing sustainable transport options to reduce levels of traffic accessing this area.
- Protect the **landscape's open vistas and horizontal emphasis**, avoiding the location of new development and vertical structures on prominent skylines. Ensure that historical vertical structures such as medieval church towers, lighthouses and daymarks remain as prominent local landmarks (e.g. by avoiding siting other vertical structures on the same skyline).
- Protect the character of the landscape's **expansive sea views**.
- Protect the landscape's **high levels of tranquillity and wild character** through the retention of dark night skies, control and management of development (including highways) and retention of green lanes and tracks ensuring significant parts of the coast remain relatively inaccessible by vehicle.



- 3.3. The application site and form of proposed settlement evidentially satisfies the above criteria. By doing this it will conserve and enhance the natural beauty and special qualities of the SD AONB whilst providing limited development that is appropriate to its setting, is in keeping with its character and which meets the economic and social needs of local communities.

The development does not accord with the local development plan and there can be no doubt that, if it had been presented to the Planning Inspectorate for the Joint Local Plan public examination, it would have received objections. Along with the 10 dwellings for each of the communities of Newton Ferrers and Noss Mayo that the Inspector deleted, the Society is confident this site would also have been deleted.

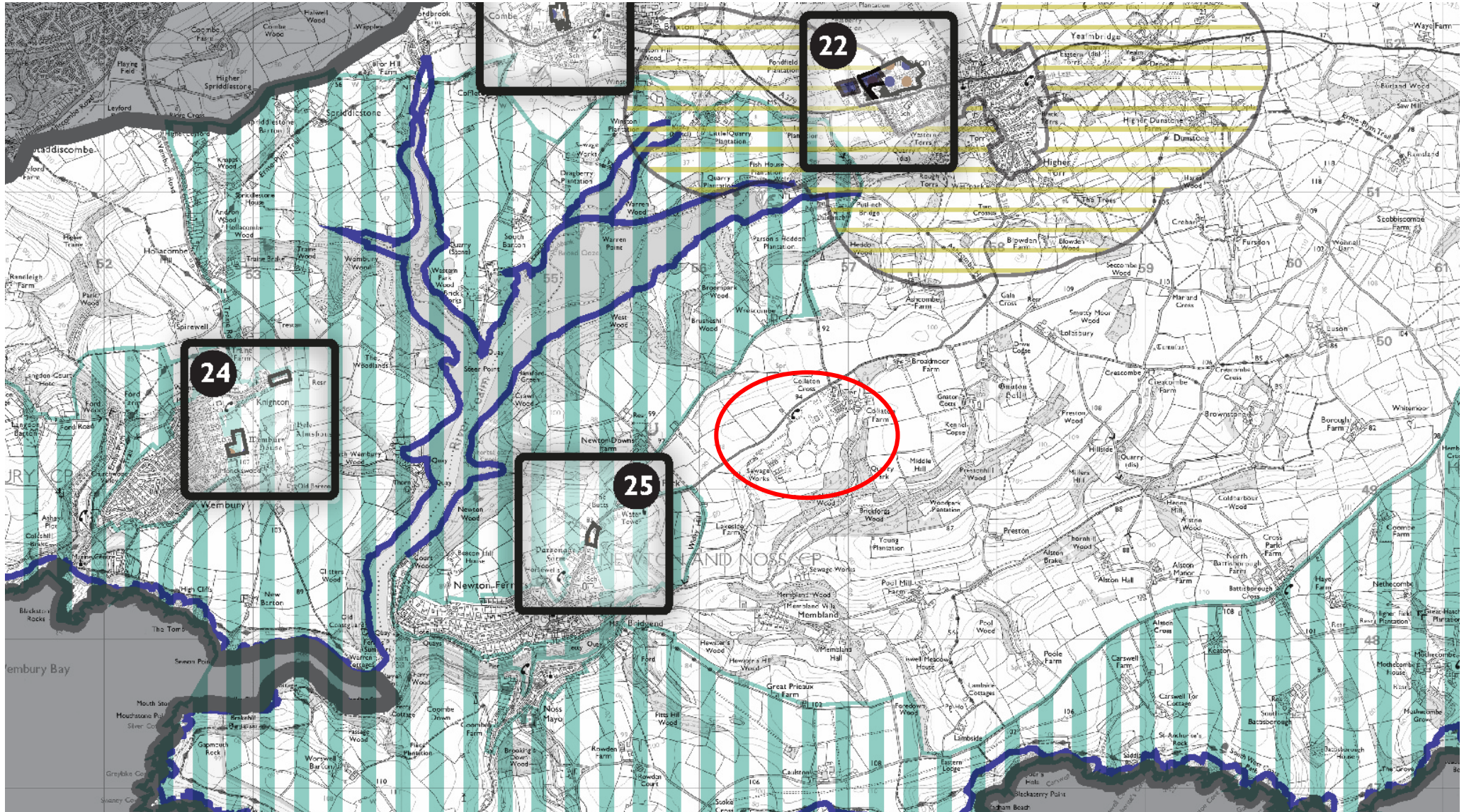
The next plan on the following page illustrates that the District Council failed to include this site in the Joint Local Plan and the site owners failed to request that the site be included in the local plan.

The second plan highlights that this proposal and Butts Park would start to form a continual ribbon of remote development that creates the requirement for new safe public foot paths with lighting that would worsen the deteriorating remote tranquillity and dark skies.

It should be remembered that the South Devon AONB bears no resemblance to larger AONBs. In this location, the AONB is a coastal ribbon of land south of the A379 barely four miles wide. Proposals such as this set between the communities of Newton Ferrers and Yealmpton / Brixton will bring into question the very existence of the South Devon Area of Outstanding Natural Beauty designation and there can be no doubt that the District Council will be failing to carry out its statutory duty to 'Conserve and Enhance' this nationally designated site.

Our assessment is reinforced by the assessments provided by the SHDC Landscape Specialist and the AONB Unit, the District Council's own expert advisers.

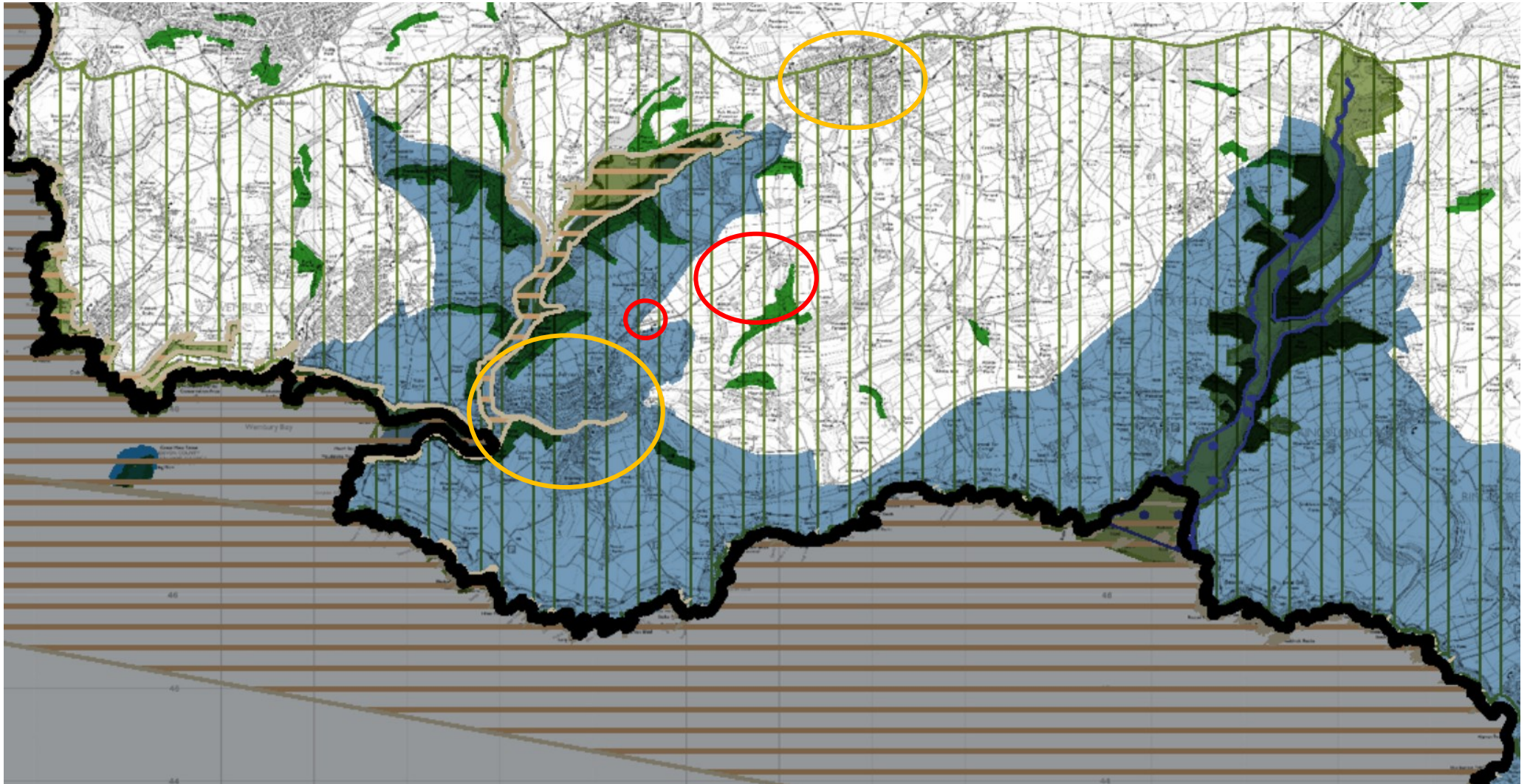
Collaton Park was not included in the JLP by SHDC or requested to be included by the site owner.



W: <https://southhamsociety.org/> FB: <https://www.facebook.com/South.Hams.Society/>  
Charity number: 263985

Registered address: Higher Norris Farm, North Huish, South Brent, TQ10 9NL

The existing communities of Newton Ferrers, Noss Mayo and Yealmpton with the proposed ribbon developments totalling 165 dwellings with commercial business units sites in the AONB designated landscape. Neither of these developments are linked to the existing communities and require extensive lighting.



W: <https://southhamsociety.org/> FB: <https://www.facebook.com/South.Hams.Society/>

Charity number: 263985

Registered address: Higher Norris Farm, North Huish, South Brent, TQ10 9NL



- 3.4. Consistency with distinctive settlement pattern and form is an important factor identifying why this application is appropriate and proportionate to its setting within the SD AONB. The scheme includes measures to avoid and minimise effects on special qualities and distinctive characteristics related to settlement form and pattern, alongside delivering landscape restoration and enhancement, in a manner consistent with SD AONB Management Plan objectives for planning and sustainable development.

This is not the South Downs AONB, and the addition of new open plateau communities in the narrow coastal region of the South Devon AONB is not consistent with the iconic wide, unspoilt and expansive panoramic views recorded in the AONB Management Plan.

### **SD AONB Management Plan 2019 - 2024**

#### **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'.*

#### **Remembering Sherford.**

*'5.15 The Council intends that the range and quality of facilities and services at the Sherford New Community will match those of the other Area Centres within the district. Sherford must function effectively as an Area Centre from early in its development, serving its own residents and a limited catchment beyond. The provision of employment, education facilities and the whole range of community infrastructure to meet local needs will be required in phase with the housing development. Although it is the Council's intention that Sherford must function as an Area Centre from early in its life, it is acknowledged that its catchment area will be more limited than the other Area Centres in the district due to its proximity to Plympton, Plymstock and Ivybridge. Sherford must complement the roles of these other centres, not compete with them.*

***Importantly, Sherford is intended to be a community providing for its residents daily needs without dependence on the motor car.***

*5.16 Local Centres are settlements that provide a lesser range and level of facilities and services than the Area Centres yet can complement their role. Nevertheless, they will have an important function in providing some services and facilities for their rural hinterlands and should be focal points for a modest scale of development. The Council considers that Chillington / Stokenham, Modbury, Salcombe, Woolwell and Yealmpton function at this level and designates them as Local Centres'.*

Yealmpton developed as local area centre on the primary road network with better public transport and sustainability credentials. The Society consider that it is inappropriate for Collaton Cross to be considered as a new community location.





The Society therefore continue to strongly object to this scale of development in the narrow coastal region that is the South Devon Area of Outstanding Natural Beauty.

For and on behalf of the South Hams Society

Richard Howell

Chairman