



**PLANNING APPLICATION REF: 2167/19/FUL**

**DESCRIPTION: READVERTISEMENT (Revised plans received) Erection of 5 additional holiday units within the grounds of Gara Rock Resort together with additional landscaping, reconfiguration of parking and associated works**

**ADDRESS: Gara Rock Hotel East Portlemouth Devon TQ8 8FA**

24th July 2020

## **LETTER OF OBJECTION FROM THE SOUTH HAMS SOCIETY**

### **The South Hams Society interest**

For nearly sixty 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 protection of 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 strenuously oppose inappropriate development, as we believe to be the case with this application.

The South Hams Society have previously (3<sup>rd</sup> March 2020) submitted a letter of objection regarding this planning application. We are writing to confirm our continued objection to this application, especially in light of the guidance contained in the recently adopted Joint Local Plan Supplementary Development Plan. The grounds for objection remain the same.

The gradual reduction in size of the proposed development does not address the basic issues regarding the use of the conditioned landscaping area for further leisure development.

New development outside the existing restricted development envelope will continue to degrade this Area of Outstanding Natural Beauty.

In the following image, at the end of the left hand concealed car parking is the proposed site for the new development. It does not matter whether there are one or five units here, the visual harm is the same. It presents an unwelcome intrusion into the landscape well outside the existing development envelope.

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

Registered address: Olde Stones, West Alvington, Kingsbridge, South Devon TQ7 3PN



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

Registered address: Olde Stones, West Alvington, Kingsbridge, South Devon TQ7 3PN



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

Registered address: Olde Stones, West Alvington, Kingsbridge, South Devon TQ7 3PN



Looking at the previous image taken from the South West Coast path looking east, we find that the previous 'secret' suite is far from secret. This confirms our view that building another one is not acceptable. From the east it will stand out far more.

It appears in the view rather like a former WWII bunker. Also notable is the highly visible umbrella and the white washed walls.

To update our previous letter, we draw on the Joint Local Plan Supplementary Development Plan adopted on the 16<sup>th</sup> July 2020 which provides further detail on the adopted JLP. These are extracts from the section on Undeveloped Coast and Heritage Coast, a precious and finite resource.

### ***Undeveloped Coast and Heritage Coast (DEV24)***

*What is this policy about?*

***7.20 DEV24 is a policy to ensure the protection of the Undeveloped Coast and Heritage Coast across the JLP area. This is done by ensuring development which would have a detrimental effect on the undeveloped and unspoilt character, appearance or tranquillity of the landscape is not permitted except under exceptional circumstances.***

***7.23 The South Devon Heritage Coast was defined in 1986, recognising it as one of the finest stretches of undeveloped coast in England and Wales. Heritage Coasts are now defined nationally by Natural England for the following purposes:***

***Conserve, protect and enhance:***

***The natural beauty of the coastline;***

***Their terrestrial, coastal and marine flora and fauna;***

***Their heritage features.***

***Encourage and help the public to enjoy, understand and appreciate these areas;***

***Maintain and improve the health of inshore waters affecting heritage coasts and their beaches through appropriate environmental management measures; and,***

***Take account of the needs of agriculture, forestry and fishing and the economic and social needs of the small communities on these coasts.***

(We highlight this last sentence because this site is not a small coastal community, but essentially a private venture and the requested changes will bring no public benefit).

***7.25 The variety of high quality, open, coastal views in this landscape, from expansive coastal clifftops to intimate estuaries, are a unique characteristic of the area that needs to be retained clear of visual intrusion.***



***7.26 Development proposals will need to fully consider impacts upon the undeveloped character, appearance and tranquillity of the coastal landscape, including consideration of night-time impacts of any lighting of the proposals alongside cumulative effects of other development in the locality upon the undeveloped character of the area.***

***7.27 Policy DEV24 contains strong principle policy tests to avoid development that does not require a coastal location and that can be located outside the Undeveloped Coast.***

***7.28 In order to justify a coastal location any development proposal needs to demonstrate what local need is being met that cannot be delivered outside the Undeveloped Coast. In terms of housing, the principle will only be acceptable if the proposal is meeting a localised need, defined in the terms of this policy as meeting a need from the immediate or adjoining parish. Any housing proposal will be restricted by a s106 agreement, restricting ownership or occupation to people who can demonstrate such a local connection. Accepting the principle of housing in an Undeveloped Coastal location does not override the requirement to meet all other policy tests applicable to sensitive and designated landscapes.***

***7.31 Applications for development to support leisure or recreational pursuits are unlikely to be supported on the basis that the proposal is not meeting a need that requires a coastal location, but rather responding to a personal preference or choice.***

We request that our earlier submission for this development proposal alongside this update is given adequate consideration by decision makers and that the LPA adheres to its own planning policies, in accordance with paragraph 7.31 of the JLP SPD, by not approving further incremental degradation of our iconic coastal scenery.

With the image below we would like to remind the District Council of the heritage views we are trying to protect at this location by restricting urban and night time illuminated private development.

We urge the LPA to refuse this application.

Yours sincerely, Didi Alayli

For and on behalf of the South Hams Society

