



## Murrawingi: South Sands in the heart of South Devon's Area of Outstanding Natural Beauty





**PLANNING REF: 1934/21/FUL**

**Address: Murrawingi Moulton Road Salcombe TQ8 8LG**

**Description: Partial demolition of existing rear extension, projecting timber balcony, reconstruction / refit of existing dwelling to include new rear extension, new timber balcony and separate raised parking area.**

16<sup>th</sup> July 2021

## **LETTER OF REPRESENTATION 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 (AONB) 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, as we strongly believe to be the case with this application.

The South Hams Society (SHS) wish to **object** to this application proposal that would impose a significant increase of new built form on a highly scenic part of the South Devon AONB.

The proposed much larger balcony, roofline alterations and very substantial balcony supports, present visually impactful features that are detrimental to the special qualities of this protected landscape.

Policy guidance sets out protection of the special qualities of the landscape character of the AONB, Heritage Coast and Undeveloped Coast. The proposed development conflicts with this guidance.

The AONB Management Plan seeks to identify the types of development likely to conflict with the AONB purposes and that have the potential to harm the AONB.

For residential development this includes:

- Large scale individual dwellings in prominent locations that are of a mass and design inconsistent with local character.

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- Development that is poorly related to an existing settlement, or fails to respect or reinforce its character, scale and density.
- Developments detracting from the vernacular building style through inappropriate scale, mass or design.

The Society concludes the proposed development does conflict with this guidance and therefore presents an unacceptable level of harm to the AONB.

South Hams District Council has a statutory duty to protect and enhance the South Devon AONB which is a nationally prized landscape and a major economic asset.

Section 85 of the Countryside and Rights Of Way Act 2000 requires the Local Authority to adhere to the purpose of conserving and enhancing the landscape and natural beauty of AONB's.

The NPPF paragraph 172 specifies that great weight must be given to this purpose.

The applicants are therefore required to demonstrate how the location, siting, layout, scale and design of the proposal 'conserve and / or enhances what is special and locally distinctive to the site'.

A key objective of the Salcombe Neighbourhood Development Plan (NDP) is that:

Any future development must have due regard of its impact on the AONB, Undeveloped Coast, the rural landscape character and green infrastructure that surrounds the separate and distinctive settlements in the Parish, and the natural valleys and landforms.

The Society considers the proposal to conflict with NDP Policies:

- ENV1 - which seeks to protect the characteristics and features of the AONB.
- B1 - safeguarding design quality and heritage assets.

The significant increase of the built mass would dramatically increase the visual prominence of the dwelling within the coastal landscape.

The Society believes the proposal fails to conserve and enhance the character and natural beauty of the area, and does not respect or contribute to the local distinctiveness of the sylvan location, and therefore is contrary to policy objectives as set out in DEV23, DEV24 & DEV25 of the Joint Local Plan.

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DEV25 (8) specifically requires development proposals to:

- Be designated to prevent the addition of incongruous features.
- Be located and designed to respect scenic quality and maintain an area's distinctive sense of place, or reinforce local distinctiveness.
- Be designed to prevent impacts of light pollution from artificial light on intrinsically dark landscapes.

Guidance within NPPF paragraph 180 sets out to identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value, and this includes limiting the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

The Society is concerned about the increased levels of light pollution that will be introduced into the prominent hillside.

The Society believes that any intention to remove and / or extensively prune trees in order to facilitate the proposed development will result in unacceptable erosion and degradation of the woodland landscape, and effectively compromises the purpose and function of the area TPO.

SHDC have published guidance on TREES ON DEVELOPMENT SITES which states:

It is important that when new development is taking place, the high quality trees which exist on the site are identified and retained. It is also important that space is made, wherever possible, for the planting of new trees.

RETAINING TREES ON DEVELOPMENT SITES states:

There is a clear and well established process for protecting trees in relation to new development. This process is set out in British Standard 5837: 2012 which establishes a clear process for:

- Surveying trees on a site coming forward for development.
- Classifying their level of importance and their priority for being retained on a development site.
- Incorporating their retention into the design at the outset.
- Putting in place measures to ensure their protection from harm during development.
- Putting in place long term management measures for their care once development is in place.

Guidance further sets out that:



Trees can be a significant asset to a development site and can add to the value of properties. Proper and early consideration can bring forward the right design.

The Society is deeply concerned that the significant increase in new built form will necessitate the removal of trees that are important features in this sensitive landscape, and consequently that the proposal fails to comply with this guidance.

Murrawingi and a number of neighbouring properties sit prominently on the sloping coastal hillside which is extensively wooded in character.

The trees provide a high level of public amenity from multiple visual receptors locally, especially from the harbour, and they are rightly subject to TPO protection.

The mature trees and vegetation on, and adjacent to, the proposed development site provide important aesthetic features to this highly scenic area of the South Devon AONB.

The JLP and the NDP both set out Policies affording tree protection that are relevant when considering the proposal.

JLP Policy DEV28 sets out protection from development that would result in the loss or the deterioration of the quality of:

- \* Ancient woodland, aged or veteran trees or impact on their immediate surroundings.
- \* Other woodlands or high amenity trees including protected trees.
- \* Important hedgerows including Devon hedge banks; will not be permitted unless the need for, and benefit of, the development in that location clearly outweigh the loss and this can be demonstrated.

The Society believe that it is unacceptable to remove and / or extensively prune trees and vegetation in order to enable this development proposal, and this must be resisted in the interests of protecting and conserving this attractive sylvan location.

Our objection is based upon the provisions of NDP Policies:

ENV1 - protecting the characteristics and features of the AONB.

ENV5 - protecting existing woodland area's and the environmental quality of the valley slopes to the water's edge.

ENV7 - seeking to maintain low density development, natural green spaces and trees.



## **Car Parking**

The Society also objects to the raised car parking deck in alongside Moulton Road. A previous application for a raised parking area 41/0468/00/F was withdrawn and considered to be visually detrimental to the local scene / Public Right of Way. This proposal is far larger and longer than the previously unacceptable scheme.

## **Public Views from the Public Right of Way**

Serious consideration must be given to the roof of this proposal. The original design of this development was a tragedy to the wonderful public views in this location. There must be no worsening of the scenic beauty of this view. Tilting an expansive roof up into the panoramic vista was a mistake. Any proposal should seek to remedy that failure.

## **Conclusion**

The Society is vehement in its belief that this proposal presents an example of overdevelopment demonstrating an insensitive disregard for the visual amenity, tranquillity and sense of place of the area, and accordingly we respectfully request that this application is refused

Submitted on behalf of the South Hams Society

