



**PLANNING REF: 4031/21/FUL**

**DESCRIPTION: READVERTISEMENT (Revised plans) Redevelopment of the existing hotel with owners accommodation to 7-holiday lets and 5 residential units.**

**ADDRESS: Sand Pebbles Hotel Inner Hope to Outer Hope Cove TQ7 3HY.**

19<sup>th</sup> June 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 last wrote to the local planning authority on 13<sup>th</sup> April 2021.

Since then we note the applicant has made some changes to the position of the buildings in an attempt to both comply with the JLP Supplementary Planning Document and address the unneighbourly attributes of the proposal.

Despite these changes, the northern buildings are still up to 4 metres closer to neighbouring properties.

The South Hams Society stated that the South Devon AONB unit had objected to the original proposal for the re-development of Sand Pebbles and the Society supported that objection.

We note the minor changes to the positions of buildings 3 and 4 with the introduction of flat sections to reduce roof height. Building 2 now has a flat roof. Currently Sand Pebbles is set back from the highway. However this proposal projects towards the highway, with five flats above the car park and a new two storey building above the flats.

Overall, these changes do little to address the concerns raised by the South Devon AONB Unit and therefore we still consider the comments made by the AONB Unit to remain relevant.

The Society does not wish to repeat the various national and local policies that the AONB Unit has recorded, but the Case Officer should still refer to AONB Unit's letter.

The Society remain of the opinion that this new proposal for the re-development of Sand Pebbles is still over development of this site that will result in harm to the AONB and is inconsiderate to neighbouring properties.

In addition the applicant has introduced flat roofs in a coastal location that may well be used by seagulls for nesting with all the environmental issues that would bring.

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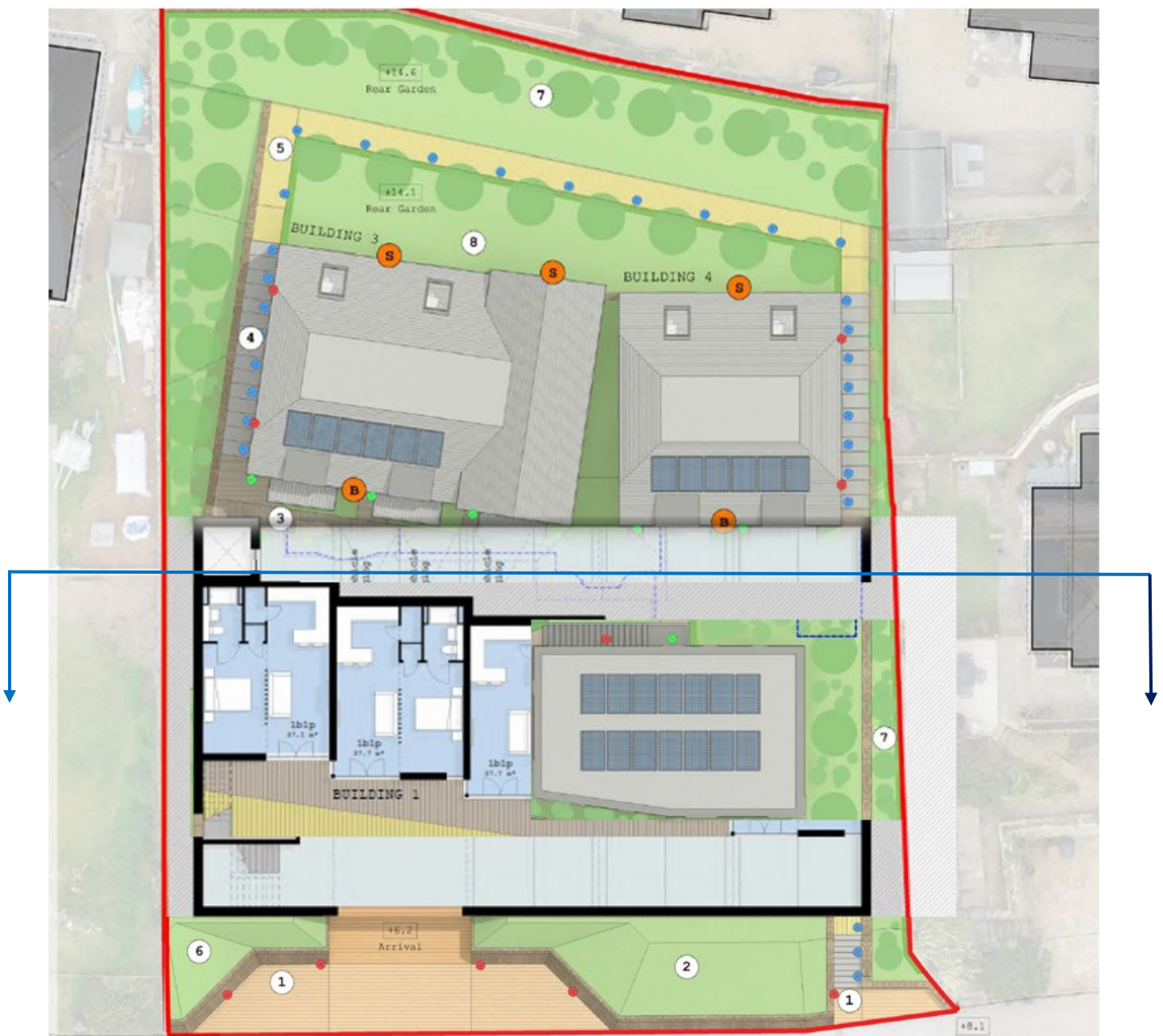
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We also believe that the applicant is over emphasising the additional landscaping. There is only a gap of 1 ½ metres to the east and west of the car parking level and flats level to the neighbouring boundaries.

We have therefore overlaid each of the levels of construction from the subterranean car park, the flats and balcony area and above them the three blocks. Either side of the car park and flats, the little area left for green landscaping is only 1 ½ metres wide. To the east of build 4, no landscaping of merit will survive, as almost no room exists. To the south of building 3 there is a small area, but the majority of landscape area is behind the north of the two builds which will serve no screening benefit to the publicly viewable areas.

**The Three Layers of Construction.** The car park, the five flats, and the three buildings.



The Blue line is the current Sand Pebbles build line and illustrates the mass of build encroaching the road

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The Landscape Plan has been drawn by Colony Architects, who do not record any landscaping background or qualifications and the Society is sceptical that the landscaping will be successful.

The green landscaped image submitted illustrates sizeable plants growing out of what will be a concrete slab car park ceiling. More plants will supposedly grow out of the one bed flat ceilings including 5 metre high trees.





The photograph below shows Sand Pebbles from the air looking north. Building 3 will be 8.5 metres from the Blue Bay building (to the left of Sand Pebbles). This is not compliant with the JLP SPD and will significantly affect the light entering the east wall windows of Blue Bay.



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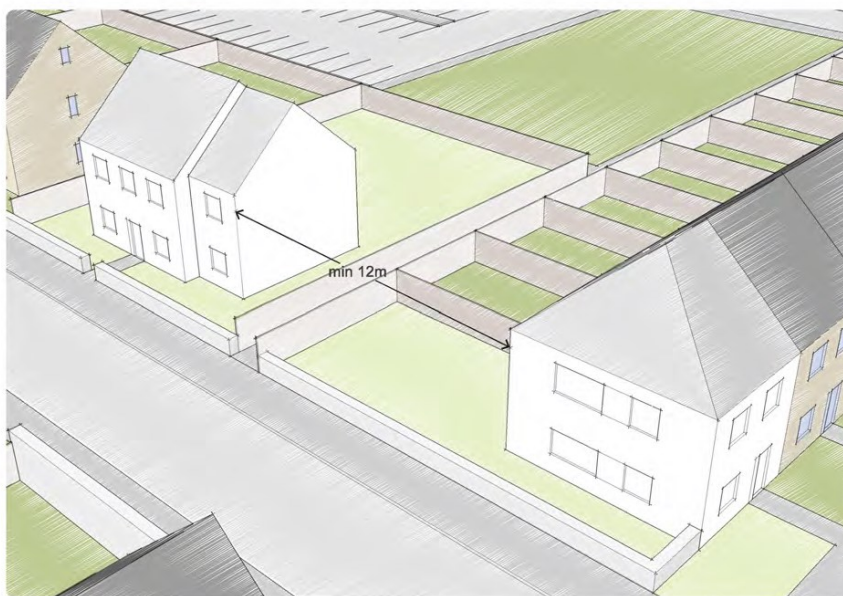
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## **Outlook**

**13.27** While views from a private house or garden are not safeguarded by planning legislation, **an extension should not be constructed in close proximity to either a habitable room window of a neighbouring property or its private garden where it would have an unacceptable overbearing effect on a household's outlook.**

**13.28** In order to protect the outlook of neighbouring properties, the minimum distance between a main habitable room window and a blank wall, should be at least 12m. This distance should be increased for a three-storey development, normally to at least 15m.



**Figure 23 Distance between habitable room window and blank facing wall**

## **Daylight and sunlight**

**13.30** Extensions should not result in a significant loss of daylight or sunlight to habitable rooms of neighbouring properties, such as kitchens, living rooms or bedrooms. An extension should also not lead to an unsatisfactory loss of light to the property being extended.

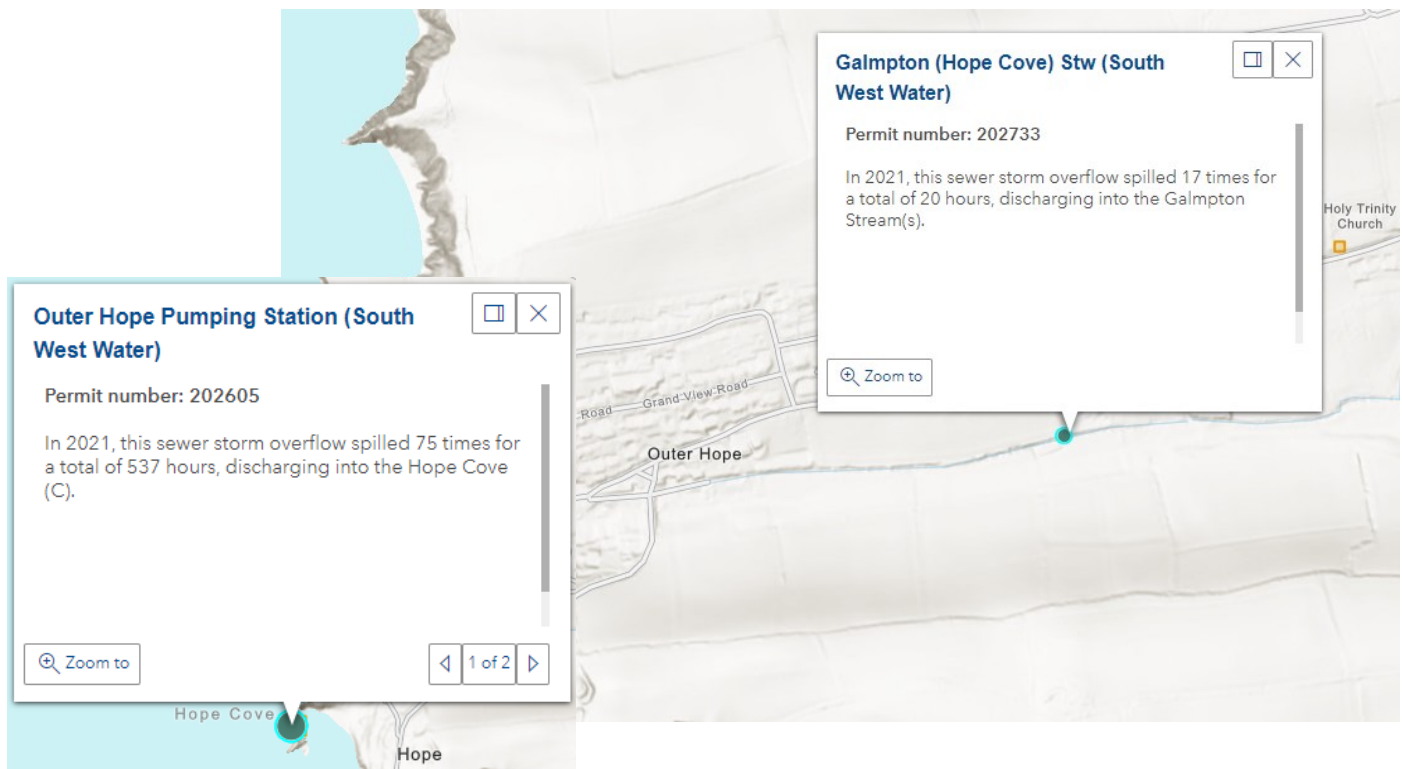


### Surface Water Drainage.

We remind the LPA that any untreated surface water discharged directly to the nearby stream drains onto a popular beach 200 metres downstream.

The LPA should also take note that this development proposes to use the local stream for its surface water apparently to be joined at the culvert. Whenever the culverted stream reaches full capacity, this development will lose its surface water drainage and would likely discharge onto the public highway (somewhere).

According to recorded sewage discharges for Hope Cove, storm overflows occur frequently.



The Outer Hope Brook has been the subject of flood modelling in 2012/3 because of 3 previous flood episodes.



When the Brook is flowing in the way these images below illustrate, the culvert would be an unsuitable location in which to connect as it would not allow additional water from another source to flow into it.

As a result the proposal would lose its surface water drainage.



Figure 3-1: April 1999 flood looking upstream from the Outer Hope bypass



Figure 3-2: April 1999 flood Outer Hope bypass culvert downstream face



There can be no clearer sign of overdevelopment of a site if the proposal fails to leave sufficient room for surface water drainage to be adequately dealt with on the site.

The Society, having considered the visual impact on the South Devon AONB, and in addition having given consideration to the impacts on the properties of existing residents, continue to register an **objection** to this development proposal that we believe will harm the character of the SDAONB.

For and on behalf of the South Hams Society

Richard Howell

Chairman