

PLANNING APPLICATION REPORT

Case Officer: Wendy Ormsby

Parish: South Huish **Ward:** Salcombe and Thurlestone

Application No: 2066/18/FUL

Agent/Applicant:

Mrs Debbie Crowther
Devon HALO
9 Lyte Lane
West Charleton
Kingsbridge
TQ7 2BW

Applicant:

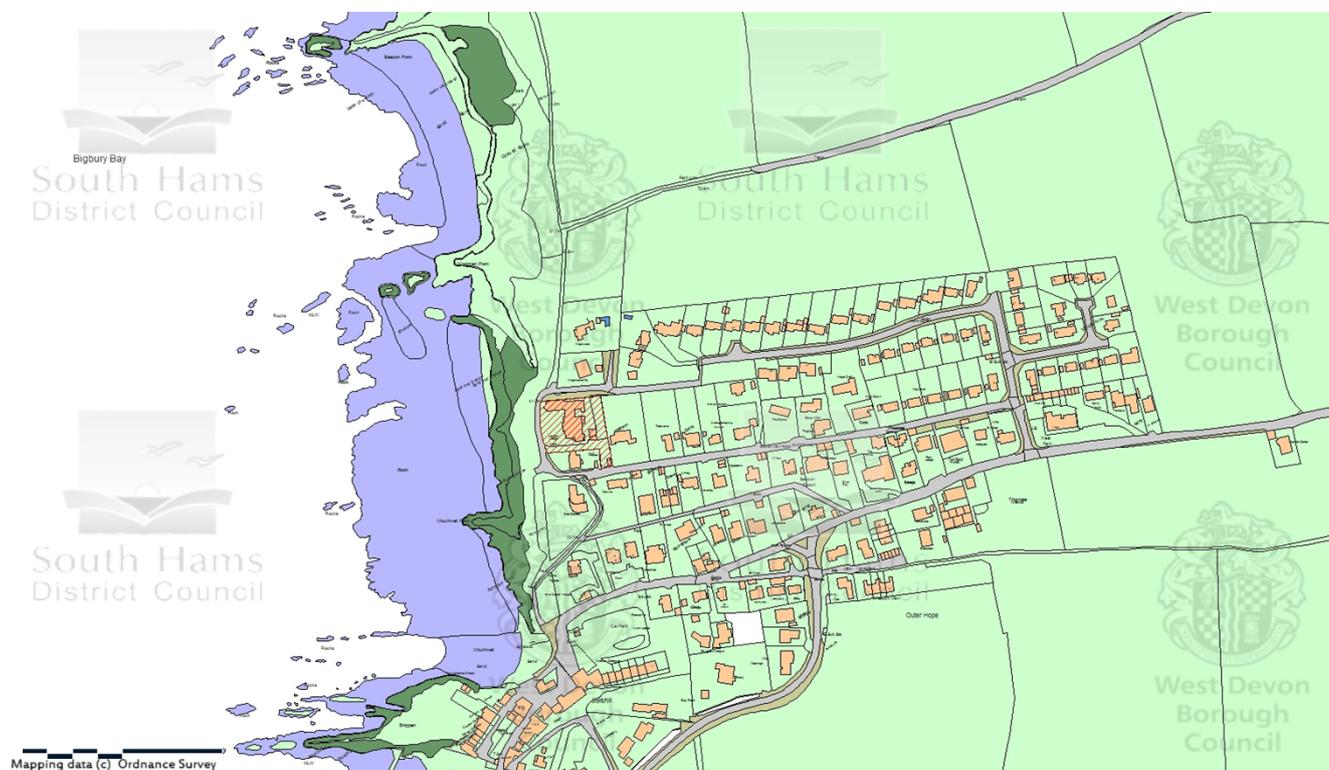
Messrs Bird & Graham
Lantern Lodge Hotels Ltd
C/O Trinity Square Developments
Airport House
Croydon
CR0 0XZ

Site Address: Lantern Lodge Hotel, Grand View Road, Hope Cove, TQ7 3HE

Development: Demolition of hotel (14 guest bedrooms, 4 staff bedrooms, indoor swimming pool, lounge/bar/dining areas etc) and construction of a mixed use development of 9 serviced short term holiday let apartments (providing total of 15 bedrooms), 1 unit of owner's/manager's accommodation and 5 residential apartments

Reason item is being put before Committee: At the request of both Ward Members for the following reasons:

- Lack of demonstrable need for the market units either by way of viability evidence or by evidenced local need (S010.1 of JLP) since the application is in the AONB and undeveloped coast.
- Inadequate parking
- Contrary to Policies DP9 and DP12



Recommendation: Recommendation: Delegate to Head of Development Management Practice (HoP), in conjunction with Chairman to conditionally grant planning permission, subject to a Section 106 legal obligation.

However, in the event that the Section 106 legal Agreement remains unsigned six months after this resolution, that the application is reviewed by the HoP, in consultation with the Chairman of the Committee, and if no progress is being made delegated authority is given to the HoP to refuse to application in the absence of an agreed S106 Agreement.

The terms of the Section 106 Obligation are:

- A contribution of £15,112.50 towards the following OSSR projects which have been identified in Hope's Cove:
 - New roof for the Fishermans Reading Room (which is regularly used by various groups including a play group and is a meeting area for training for Stand Up Paddle boarding (SUP) and Kayaking sessions which set off from the nearby beach. The outside garden area is also used by local groups including the pre-school); and/or
 - Creation of a parish circular walk (installation of waymarkers and production of a leaflet); and/or
 - Provision of shower unit at the beach to serve sporting activities such as SUP, Kayaking, Bodyboarding, Surfing and Canoeing; and/or
 - Improvements to the South West Coast Path (improving the surface of the 1km disabled access path at Bolberry Down and improved gate onto SWCP at Hope Cove entrance to Bolt Tail as current access very narrow); and/or
 - Creation of running guide for Bolt Head to Bolt Tail area including production of a map and installation of waymarkers on the ground
- Secondary school infrastructure financial contribution of £16,440.00
- Primary school transport: £26,600.00
- Secondary school transport £3,097.00
- Holiday units to be used for the provision of short term holiday lets, to be marketed and available for rent all year round and retained within the control of a single management company.

Conditions (included in full at back of report)

1. Time
2. Accords with plans
3. Material details/samples to be agreed
4. Details of a minimum of 10 integral nest sites (swift bricks) to be agreed and provided
5. Parking and turning to be provided and retained
6. Material details and samples for external materials and balcony balustrades
7. Hard and soft landscape scheme (full details of species, sizes, densities and locations of plants) to include the retention and enhancement of the existing boundary hedgerow, and material samples of hard landscaping.
8. No works to or removal of boundary vegetation until a management plan has been submitted to and approved in writing by the LPA.
9. Hedge and tree protection
10. A lighting strategy, to include locations, fixtures, lumens, and measures to reduce light spill for any external light fixtures.
11. Unsuspected contamination
12. CEMP

13. Provision of electric vehicle charging points
14. Details of levels
15. Holiday use restriction on the 9 holiday let apartments
16. Owners accommodation to be used by person who is mainly occupied in the management of the holiday units.
17. Pre-commencement - Percolation testing
18. Pre-commencement – detailed surface water drainage management scheme
19. Pre-commencement – construction phase surface water drainage management scheme
20. Travel plan for staff.

Key issues for consideration:

The main issues are any potential loss of the employment use and tourist asset, the visual impact of the proposal and any impact on the South Devon AONB, access and parking, and any impact on the amenity of neighbouring properties.

Financial Implications (Potential New Homes Bonus for major applications):

It is estimated that this development has the potential to attract New Homes Bonus of £6120 per annum, payable for a period of 4 years. Members are advised that this is provided on an information basis only and is not a material planning consideration in the determination of this application.

Site Description:

The 0.245 hectare site lies in Outer Hope at the north western side of the settlement. The application building currently operates as a privately run bed and breakfast with 14 rooms to rent. To the front of the building, on the western elevation fronting the South West Coast Path, is an attached indoor swimming pool.

Lantern Lodge Hotel is bounded by residential development to the north, east and south. To the west of the site lies Cliff Road, which provides access to properties to the north of the site. To the west beyond the access road lies the South West Coast Path and the coastal cliffs.

The topography of the land slopes downwards from north to south. Properties to the north of Lantern Lodge Hotel, are at a higher level to Lantern Lodge, and Cliff House to the south is at a lower level. The main ridge levels to these properties step down following the natural topography of the land.

Viewed from the west seaward elevation, the existing building is two storeys in height with a main pitched roof over that runs in a north to south direction parallel to the coastal footpath. Three pitched roof projecting gables are a distinctive feature of the western elevation. The pitched roofs are clad in red tiles, the walls are predominantly painted render, windows and doors are white uPVC. Most of the first floor of the seaward elevation benefits from a projecting balcony. The building housing the swimming pool is single storey in height and projects out from the front face of the main building by 15.4m. The main view of the swimming pool from outside the site is of its flat roof which is clearly visible due to the topography, this is a negative, alien feature in the landscape.

The application site lies within the development boundary for Hope Cove as identified in the adopted Development Plan and lies within the South Devon Area of Outstanding Natural Beauty (AONB) and Heritage Coast

Public Rights of Way run along the western and northern site boundaries.

The Proposal:

The proposed development is for the demolition of the existing hotel on the site which comprises 14 guest bedrooms, 4 staff bedrooms, indoor swimming pool, lounge/bar/dining areas

etc and the construction of a mixed use development of 9 serviced short term holiday let apartments (providing total of 15 bedrooms), 1 unit of owner's/manager's accommodation and 5 residential apartments.

The Design and Access Statement describes the development as follows:

The proposals on the accompanying plans show three buildings that step down the site fully respecting both the fall of the land and the ridge heights of existing neighbouring buildings. Viewed from the prominent west, seaward elevation, the appropriate scale of the three buildings and their stepped appearance contribute towards the overall development sitting comfortably on the site.

Accommodation in the apartments is arranged over three levels. The use of gables and contemporary flat roof dormer windows enables area in the roof space of the buildings to be utilised as the upper level of accommodation.

The lower floor of each building on the seaward elevation is shown to be clad in natural stone. Smooth render and natural slate cladding is used on the upper floor levels. On the east elevation the walls are a mixture of white render and natural slate hanging. The use of different materials acts to break up the visual mass of the buildings and adds interest to the elevations. The use of natural stone to the lower floor of the buildings on the seaward elevation will soften the visual appearance of the development and contribute to the buildings being assimilated into the landscape.

Natural slate is proposed for the pitched roofs over the buildings. This is in keeping with the traditional local vernacular.

Fenestration on the seaward elevation has been carefully designed to achieve a good balance between glass and solid walls. Fenestration at each level of the building is well proportioned. With regard to glazing, the design respects the sensitive coastal position of the site and the need to respect the character of the local vernacular and also avoid light pollution within the AONB.

Railings rather than glass as balustrade to the balcony areas add visual interest to the seaward elevation and reduces the use of glass within the development.

Upper level balcony areas are inset within the gables to the buildings. The upper level glazing within each gable on the seaward elevation is set back from the front face of the building. This feature will create a shading effect that will again act to reduce the visual mass of the building, add interest to the facade and reduce the visual impact of glass on the west elevation.

On the east elevation, fenestration has been designed to respect the relationship with adjacent neighbouring properties and keep to a minimum the effects of overlooking (both real and perceived). Apertures are much smaller on the east elevation compared to the west elevation. No balcony areas are proposed on the east elevation.

The north and south elevations of the development feature inset areas within which are hidden additional glazing. This is a design solution to achieve good levels of light and natural ventilation in the proposed buildings whilst at the same time respecting the relationship with neighbouring properties.

The existing hedge along the seaward boundary will be retained and a landscaping scheme for the site has been submitted.

The existing swimming pool will be removed and its footprint reverted to soft landscaping

Provision for the parking of 26 vehicles will be located on the east side of the site, generally within the area currently used for parking.

The application as initially submitted was not considered acceptable by officers having regard to matters including its landscape impact, impact on the character of the area and parking provision. The application has been amended a number of times in an attempt to overcome the concerns raised.

The accommodation schedule is as follows:

Area Schedule (GIA)

Name	Area Type	Area	Comments
Unit 1	Floor Area	75 m ²	2 Bedroom, 4 People
Unit 2	Floor Area	100 m ²	3 Bedroom, 6 People
Unit 3	Floor Area	65 m ²	2 Bedroom, 3 People
Unit 4	Floor Area	81 m ²	3 Bedroom, 4 People
Unit 5	Floor Area	100 m ²	2 Bedroom, 4 People
Unit 6	Floor Area	67 m ²	1 Bedroom, 2 People – holiday let
Unit 7	Floor Area	100 m ²	3 Bedroom, 6 People – holiday let
Unit 8	Floor Area	57 m ²	1 Bedroom, 2 People – holiday let
Unit 9	Floor Area	80 m ²	3 Bedroom, 4 People – holiday let
Unit 10	Floor Area	100 m ²	2 Bedroom, 4 People – owner/manager apartment
Unit 11	Floor Area	61 m ²	1 Bedroom, 2 People – holiday let
Unit 12	Floor Area	74 m ²	2 Bedroom, 4 People – holiday let
Unit 13	Floor Area	51 m ²	1 Bedroom, 2 People – holiday let
Unit 14	Floor Area	56 m ²	2 Bedroom, 3 People – holiday let
Unit 15	Floor Area	88 m ²	1 Bedroom, 2 People – holiday let
		1156 m ²	
Office & Store		Office Area 20 m ²	
Plant Store		Area 6 m ²	
Refuse Store Area		11 m ²	

Grand total: 21 1192 m²

This can be summarised as:

5 x 1no bed units
 6 x 2 bed no units
 4 x 3 bed no units

Consultations:

- County Highways Authority: No objection
- Environmental Health Section: No objection subject to conditions
- SHDC Landscape: No objection subject to conditions
- Natural England: Requires an LVIA and re-consultation when received
- SHDC OSSR: No objection subject to financial contribution of £15,112.50
- RSPB: No objection subject to conditions to require integral nest sites – swift bricks
- SWW: No objection

- Police AOL – objects - provision of 16 on-site parking spaces is inadequate (15/8/18)
- DCC Flood Risk: No objection subject to conditions
- DCC Education: No objection:

Regarding the above planning application, Devon County Council has identified that the proposed increase of 5 family type dwellings will generate an additional 1.25 primary pupil and 0.75 secondary pupils which would have a direct impact on Marlborough Primary and Kingsbridge Secondary.

In order to make the development acceptable in planning terms, an education contribution to mitigate its impact will be requested. This is set out below:

We have forecasted that there is currently capacity at the nearest primary school for the number of pupils likely to be generated by the proposed development and therefore a contribution towards primary education infrastructure will not be sought. However the nearest secondary school currently does not have capacity for the number of pupils likely to be generated by the proposed development. Therefore, Devon County Council will seek a contribution directly towards additional secondary education infrastructure at the local secondary school that serves the address of the proposed development. The contribution sought is £16,440.00 (based on the DfE extension rate of £21,921 per pupil). This will relate directly to providing education facilities for those living in the development.

We will also require a contribution towards primary and secondary school transport costs due to the development being further than 1.5 miles from Marlborough Primary and further than 2.25 miles from Kingsbridge Secondary. The costs required are as follows: -

2 Primary pupils

£10.00 per day x 2 pupils x 190 academic days x 7 years = £26,600.00

1 Secondary pupil

£3.26 per day x 1 pupils x 190 academic days x 5 years = £3,097.00

- Town/Parish Council – (no comments received regarding latest revised plans)

UPDATED RESPONSE 16th November 2018 following Readvertisement of 2066/18/FUL

South Huish Parish Council have considered the documentation provided re the readvertisement of the above planning application. All original comments from 26th September stand (see below).

We would further comment that the report provided by RPG has little impact on the woefully inadequate parking facilities proposed. Statements re reduced daily vehicle movements are incorrect as no consideration has been given to the increase of delivery vehicles to the site – supermarkets/fast food.

The plans would clearly lead to an unacceptable impact on highway safety for those on site as well as the surrounding residents.

South Huish Parish Council reiterate that this application should not be approved under any circumstances.

South Huish Parish Council have viewed the information received in respect of the above application. The councillors were very dismayed by the standard of the submission and the lack of relevant information provided/available. To date the following information is insufficient, missing or incorrect:

- *Pre-application advice was provided to the applicant as clearly stated on the application, no written details of this have been made available.*
- *No consideration given to the provision of affordable housing in an area with an exceptional and demonstrable local need.*

- *No submission of viability study that indicates such provision would compromise the overall viability of the development. Contrary to South Hams Core Strategy Policy CS6 and the provision of the South Hams Affordable Housing SPD.*
- *Grand View Road noted as being a metalled road, this is incorrect, it is a cinder track road and further development will cause the road structure and local safety to suffer.*
- *No bat report has been provided.*
- *No hedge & tree survey provided – contrary to National and SHDC planning guidance. The application states no hedges/trees, this is incorrect.*
- *The surface water drainage strategy concludes that the soakaway drainage will not be appropriate and recommends further geotechnical investigations.*
- *No geotechnical investigations to date have been made public.*
- *The contamination report recommends a demolition asbestos survey and specialist decommissioning of oil pipes, pumps and tanks but the application states no suspected contamination.*
- *A number of unnamed rooms are shown on the plan which is contrary to SHDC guidance.*
- *No revised ground floor plans or Eastern Elevations have been submitted which are consistent with the Landscape Concept plan.*
- *Seemingly no disabled access at the development.*
- *Seemingly no facilities for employees working at the site.*
- *Incorrect/Inconsistent floor areas provided for various locations.*

SHPC insist that no decision is forthcoming from SHDC unless the above issues are addressed satisfactorily. Ideally the application should be withdrawn.

Further to the above, based on the documentation already provided, SHPC unanimously object to the application for several reasons which include, but are not limited to, the following:

- *A policy was introduced some years ago in respect of protection against the loss of hotel rooms. Owen masters specifically added Hope Cove to that list, as far as SHPC are concerned, it is still in existence, local policy and relevant to this parish. The policy has not been considered and must be included when deliberations take place.*
- *DP1 High Quality Design – the development does not contribute positively to its setting by enhancing the local character, nor does it take account of the layout, scale, appearance, existing materials and built and natural features of the surrounding area. Furthermore, it does not incorporate layouts which allow ease of movement within the site and between adjacent areas and the needs of pedestrians, cyclists and public transport users are clearly not placed above those of the motorist; Local views and skylines will be affected detrimentally in the AONB.*
- *DP2 Landscape Character – the proposals remove trees and hedges from the site and do not conserve the local landscape character. The building has a larger footprint and is higher than the existing structure thereby giving an unsympathetic intrusion in the landscape by impacting the skylines and views from the South West Coast Path and local vantage points around the AONB.*
- *DP3 Residential Amenity – the proposals will have an unacceptable impact on the living conditions of the owners of nearby properties. There will be an overbearing impact. Significantly increased vehicles will cause noise and disturbance at all hours as well as associated odours and fumes. The parking provision of 24 spaces is inadequate and will lead to vehicles parking on Grand View Road. This is not acceptable to the Highway Authority. Parking on Grand View Road would restrict access to residents' land/garages as well as hindering delivery vehicles and, more importantly, it would prevent emergency vehicle access.*

24th July, Richard Jackson of the Highway Authority concluded the site is being overdeveloped and therefore recommended refusal until the issue was properly addressed. The Highway Authority recommended a total of 26 spaces to service the proposed 30 bed site, initially only 16 spaces were shown. Noted that there is no space to accommodate parking on the public highway. Further noted inadequate reversing/manoeuvring space for a number of those spaces.

17th August, Richard Jackson of the Highway Authority recommends conditions following a new parking plan. We strongly question how the addition of a further eight spaces in the same measured area can provide adequate reversing/manoeuvring space for all vehicles including those providing deliveries to the site. If 16 spaces with inadequate manoeuvring space is considered overdevelopment, how can that same area then be acceptable with 24 spaces (which is still 2 less than the recommended 26 spaces)?

Furthermore, the application gives a suggestion that sofa beds will be incorporated for extra accommodation in the letting apartments and noted that staffing will stand at 3 full time and 2 part time, there will only be one 2 bed manager residence ergo we assume 2 full time and 2 part time employees will travel to the site – meaning a requirement for up to nine further beds plus four staff none of which are catered for in the parking availability. The site is potentially in a position whereby it requires 43 spaces but only has a maximum of 24 available. Plus, room is required for associated delivery drivers and their manoeuvres etc. **Parking is woefully inadequate.**

The Police consultation response also raises concerns re the ramifications of failing to factor in practical and sufficient parking provision for the proposed development having the potential to create vehicle related problems and complaints because of inconsiderate and obstructive parking, which is and always has been a source of conflict and upset. The police also requested that the parking provision for the proposed development is fully considered prior to determination to ensure that it is both sufficient, balanced against the number of overall bedrooms, and that the design of the parking area is adequate, practical and safe to use and will accommodate all types of vehicles, not just cars.

- DP6: Historic Environment – the demolition and replacement of the existing structure will detract from both the character and appearance of the area. The property is not beyond repair or reuse and evidence exists to show that the viability of the existing property should not be in question.
- DP7 – Transport Access & Parking – Hope Cove is located in a rural area; the local transport services are infrequent, and access is mostly by private car. Parking is a particularly contentious issue in the South Hams and especially so in Hope Cove. As previously stated, this application does not give priority to pedestrians or cyclists over the private car. There is no safe easy and direct movement available for those with mobility issues and seemingly no disability access catered for. There is inadequate manoeuvring area for all modes of transport and furthermore the highway safety and traffic movement will be severely impacted when the overflow vehicles then park on Grand View Road – something not accepted by the Highways Authority or the Police.
- DP9 Local Facilities – Change of use should not be given unless there is alternate provision, absence of demand for the facility or it can be shown as non-viable. The application proposes the loss of a valued tourist facility in a prime location without any explanation of why an alternative solution cannot be found to maintain a business providing tourist services and some local employment. The loss of such a facility would be harmful to the purposes of the AONB designation and is contrary to policies DP12, DP14 of the South Hams Development Policies DPD and the National Planning Policy Framework.

The National Planning Policy with reference to development in Coastal Villages states that in these locations it is important to strike a balance and to maintain/improve viability while being of appropriate scale AND meeting the needs of LOCAL people. If developers can truly prove that Lantern Lodge is not viable and can then give and option to make changes that comply to the letter of this document, councillors may reconsider.

However, at a South Huish Parish Council meeting on 15th August 2018, the applicant, Mr Bird, clearly stated to the councillors and the other 45 attendees that the Lantern Lodge is neither making nor losing money – we would argue that an unviable business is loss making. If Mr Bird is putting no effort into this business in the form of investment or marketing and it is still not making a loss the overall business can hardly be deemed unviable.

At the same meeting, a parishioner commented that the turnover of this established B&B could be easily developed further by increasing the food/beverage offering to provide lunches, dinners and a fully licensed bar area. There is a large lawn and significant passing trade to allow for increased seating with an outstanding view during fine weather. The current turnover is minimal in comparison to properly run hotel – and a direct comparison would always be shown as detrimental to viability. A local stock auditor with knowledge of similarly located venues has also confirmed that turnover could be very significantly improved by the Lantern Lodge providing an increased food/drink offering as you would expect from a venue of this nature.

Lantern Lodge Hotels Ltd was formed in July 2017 for this development – it is listed as a business for development of building projects. Proof that owners did not ever intend to run the property as a hotel and only ever purchased it to develop it and sell on, contrary to Section 12 local plan, 1. Provide 2 years of occupancy. Advertise hotel as going concern at market rate for one year. The current owners have not listed it for sale and it has not been run as a hotel, only as a B&B. The accounts ended 2018 are not representative of a hotel and show distorted figures with closure of the hotel for 5m having only been run for 3m. Virtually nothing has been spent on advertising/marketing – a simple method of distorting success and viability.

- *DP11 Housing Mix & Tenure - Hope Cove currently stands at 80% second homes. These second home figures are damaging to the community – a community that will not be sustainable if this type of development continues. The proposals incorporate 14 holiday lets and 5 homes for sale on the open market. This immediately increases the second home percentage as **no consideration has been given to local affordable housing in an area with an exceptional need.***

Noted The revised Landscape Concept Plan has been commissioned by a London Estate Agent rather than the Applicants which reinforces the view of some objectors that this is an application for 16 dwellings.

There are no guarantees in place that the properties won't, in time, all be sold off as residential properties thus further impacting the local community and economy.

- *DP12 Tourism & Leisure – The South Hams is renowned for being a very popular tourist destination and Hope Cove relies on tourism for the survival of its economy. It is true that there is pressure in Hope Cove to convert tourist accommodation to other uses, particularly from hotels to residential uses. If this can happen the appeal of Hope Cove will be threatened, and the local economy will suffer as a direct result.*

When staying at hotels, guests often eat out and shop locally compared to those staying at holiday lets who are now shown to be using supermarket deliveries and eating at home thus directly depriving the local economy as money spent does not remain in the area.

The proposed residential properties will become second homes as their market price will be outside of that afforded by residents.

We have already shown that the existing owner had no intention of running the property as a hotel and has allowed the property to become further run down to aid with proof of unviability, however, despite these efforts, the owner has also declared that the hotel is neither making nor losing money, the Lantern Lodge Hotel could clearly be a perfectly viable property given the right management. There is a proven demand for the Lantern Lodge Hotel and it most certainly does make a positive contribution to the economy.

The application proposes the loss of a valued tourist facility in a prime location without any explanation of why an alternative solution cannot be found to maintain a business providing tourist services and some local employment. The loss of such a facility would be harmful to the purposes of the AONB designation and is contrary to policies DP12, DP14 of the South Hams Development Policies DPD and the National Planning Policy Framework.

- *AONB - There will be cumulative effects that will have a great impact on the AONB, if this is successful, other applications will be forthcoming with similar proposals to reduce hotel space in Hope Cove with a view to increased second home ownership.*

Re Section 15, July 2018 NPPF, Paragraphs 170, 171 and 172 should all be given great consideration, the applicant has failed to establish any contribution or enhancement or to recognise the land instability of the immediate surrounding area. The application falls into the Area of Outstanding Natural Beauty which has the highest status of protection, yet the plans want to increase the footprint/height of the building, reduce trees, shrubs/hedges and to mar the stunning views from the world renowned South West Coast Path.

Development on the site will affect the AONB landscape and increase the incidence of cliff falls.

Current guests are generally adults with few children, the proposed development will bring more children to the area. There is currently signage in place stating, “unstable cliff stay away”. The proposed removal of the trees/hedges will affect root structure and there are no plans for any additional safety features on the cliff edge. This is clearly a very significant Health & Safety issue as well as being detrimental to the AONB and the geology of the area.

Noted that there have been two recent cliff falls.

South Huish Parish Council unanimously object on the above basis, we also reserve the right to forward further objections and statements once the application documentation has been rectified as previously stated.

Representations:

- Question accuracy of plans in particular the current distance between Cliff House and the existing development and proposed separation distance
- Existing hotel is viable and hotel use should be retained.
- Business has been allowed to run down
- Will set a precedent for the loss of other hotels in the area
- Out of scale with the area
- Overbearing impact
- Inadequate parking provision
- Adverse impact on highway safety as Grand View Road has no footpaths
- Grand View Road is not properly made with a thin layer of tarmac over cinder- - it will degrade with added traffic
- Malborough NP parking standard is 2.4 per residential unit and this should be applied
- There are already parking problems in Grand View Road and any overspill parking will make this worse
- Change from B&B business to self catering holiday accommodation will result in less spending in the village.
- Application form says there are no trees or hedges when there clearly are.
- Conflicting information in the application
- Information on traffic movements is false – the development will not result in a reduction in car movements
- Increased traffic will result causing congestion on the narrow approach road
- Will aggravate subsidence problems on the nearby cliff – piling during construction could impact on this
- Contrary to adopted and emerging development plan policy and the NPPF
- Dwellings could be sold off as holiday homes
- Adverse impact on residential amenity
- If sofa beds are included increases parking need
- Loss of privacy from overlooking
- Loss of light to neighbours
- Pollution from car traffic with impact on amenity
- Adverse impact on the AONB
- Adverse impact on SW Coast Path
- Crime and disorder will result from inadequate parking
- Terraced architecture is out of character with Hope Cove where detached dwellings are typical.
- Already over supplied with holiday homes (75% of dwellings are holiday homes).
- No capacity to take more sewage – system regularly fails
- No need for a managers house
- Parking layout does not allow for deliveries or emergency services
- Adverse impact of construction traffic
- Adverse impact on character of village and area
- No longer a 'sustainable village' in the JLP
- Major development in the AONB – contrary to NPPF
- Construction Management Plan is inadequate
- Restricted access for disabled

Relevant Planning History

1333/16/FUL: Demolition of the Lantern Lodge Hotel and construction of 5 Dwellings

Lantern Lodge Hotel Grand View Road Hope Cove Kingsbridge TQ7 3HE

Refused for the following reasons:

1. The application proposes the loss of a valued tourist facility in a prime location without any explanation of why an alternative solution cannot be found to maintain a business providing tourist services and some local employment. The loss of such a facility would be harmful to the purposes of the AONB designation and is contrary to policies DP12, DP14 of the South Hams Development Policies DPD and the National Planning Policy Framework.

2. The proposed development does not provide affordable housing provision in an area with an exceptional and demonstrable local need. No justification has been provided by way of submission of a suitable viability study that indicates that such provision would compromise the overall viability of the development. As such the proposed development is considered contrary to South Hams Core Strategy Policy CS6 and the provisions of the South Hams Affordable Housing SPD.

ANALYSIS

Principle of Development/Sustainability:

The site is a brownfield site within the settlement of Hope Cove where the principal of development is acceptable subject to all other material planning considerations. The site is currently in use for the provision of tourism accommodation, it was previously a hotel and now operates as a 14 bedroom bed and breakfast.

The proposed development includes the provision of 9 self catering holiday apartments with a total of 15 bedrooms, one unit of owners accommodation and 5 open market dwellings (3 x 2 bed and 2 x 3 bed).

The current hotel is a tourist and employment asset and the retention of the hotel land use is managed through adopted planning policies DP12 and DP14

Economic Impact

This application is supported by a Commercial Viability Statement which seeks to demonstrate through the submission of recent accounts that the existing bed and breakfast business is not profitable and considerable investment would be needed to convert the property into a modern hotel; it is argued however that such re-development would not be viable as the market for smaller hotels is diminishing. The report quotes competition from the expansion proposals at the Cottage Hotel in Hope Cove and a shift in market demand to self-catering holidays reinforced through enterprises such as Air BnB.

The report sets out that the number of tourist bedroom will increase from 14 to 15 through this proposal and that it is likely that some of the market dwellings will also be rented out as holiday lets, adding to the number of beds. Servicing the nine holiday lets is expected to generate the same staffing requirements as the current business.

The existing B & B use is open for only 7 months of the year, the holiday letting units will be available for letting year round; they are likely to attract longer, one or two week stays rather than shorter weekend visits currently common at the B&B. The consequence is that the extended season, greater number of letting rooms and longer stays would generate a greater economic benefit to the local area.

Objectors to the application believe the hotel use could be viably reinstated and that hotel or B & B use has greater local economic benefit as people are required to use external catering services. The only evidence regarding viability however indicates it would not be viable to bring the building back into use as a hotel. Whilst self-catering accommodation does allow for guests to cook their own food, when on holiday there is a tendency for people to eat out often, and when shopping to use local food suppliers if available as this is part of the holiday experience.

On balance Officer's consider that the proposed re-development of the site is likely to enhance the local economy.

Impact on tourism provision

Adopted policy DP12 states the following:

Proposals for tourism and leisure development, and tourist accommodation, will be permitted where they:

- a. are located in sustainable and accessible locations;*
- b. do not undermine the vitality or viability of nearby settlements;*
- c. provide a high quality attraction or accommodation; and*
- d. encourage an extended tourist season.*

2. In addition, in the countryside proposals will only be permitted where they:

- a. demonstrate they require a rural location and cannot be accommodated elsewhere, or be associated with the expansion of an existing facility; and*
- b. support the objectives of rural regeneration.*

3. Proposals involving the loss of tourist or leisure development, including holiday accommodation, will only be permitted where there is no proven demand for the facility and it can no longer make a positive contribution to the economy.

The proposed development is in a sustainable location, will support the vitality and viability of nearby settlements, will provide high quality accommodation and encourage an extended tourist season. As such the proposed development is in accordance with policies DP12.

The proposed development will not result in the loss of tourist accommodation as a greater number of letting bedrooms will be provided, with the potential for more if the market dwellings are also let out. Policy DP12 does not restrict the type of accommodation, it just seeks to ensure tourist provision is not lost.

The proposed development is in accordance with adopted Policy DP12

Impact on employment provision

Adopted Policy DP14, Protection of Employment Land states:

'Development proposals that result in the loss of employment land, including Use Classes B1 (Business), B2 (General Industrial) and B8 (Storage and Distribution) and other employment generating uses, such as the marine economy, will only be permitted where it can be demonstrated that:

- a. the employment use of the site is no longer viable, and has no prospect to becoming so; or*
- b. there is a sufficient supply and variety of alternative available employment uses to provide a range*

of employment opportunities in the local area; or

c. the use is no longer appropriate in its context and there is a suitable replacement site available in the same locality; or

d. the nature of the employment provided at the site is not of strategic importance to the wider economy nor has locational requirements that could not be met elsewhere.

Where the change of use of an employment site is considered acceptable, mixed use development will be sought. Where necessary, the proposal will only be permitted if the scheme contains an element of employment which, as a minimum, provides for the same number of jobs.'

This policy is supported by emerging policies DEV14 and DEV15 in the emerging Plymouth and South West Devon Local Plan (JLP)

At present the whole application site is employment land. The current proposal will take some of this land out of employment use therefore it is relevant to consider Policy DP14. In this case a mixed use is proposed and it has been indicated that the new holiday letting units will replace the lost B&B bedrooms and provide for the same number of on-site jobs. It has also been demonstrated that the current B & B use is not viable in the long term. On this basis the proposed development is in accordance with Policy DP14.

Design/Landscape:

The site is in a sensitive and prominent location in the AONB and Heritage coast and sits adjacent to the very well-used SW Coast Path.

Adopted policies DP2 and CS9 and emerging policies DEV24, DEV25 and DEV27 require that landscape character should be conserved and that great weight should be given to conserving landscape and scenic beauty. This reflects the provisions of para 172 of the National Planning Policy Framework.

The development proposals have been revised a number of times in the life of this application in response to concerns raised by officers with regard to landscape impact. The current proposal is reduced in scale and massing, uses materials and colours that help it recede into the landscape and avoids an uncharacteristic uniformity of design.

Whilst physically a single building it is designed to appear as three adjacent buildings and this is achieved by used set back glass links. The gables are typical of Hope Cove but are deliberately distributed more randomly across the frontage to avoid an unduly linear and regimented appearance to the building. The ridge heights for most of the building are not significantly higher than the existing building. The impact of apex glazing and full height windows is minimised by the windows being recessed into the building and by the use of louvres forward of the apex glass.

The scheme has been assessed by the Council's landscape specialist in consultation with the AONB Unit and the comments are as follows:

As set out previously, in respect of the principle policy tests in the NPPF, this application is not considered to constitute "major development" in the context of paragraph 172, due to the replacement nature of the proposals, in the context of an existing settlement.

A number of significant concerns were raised with the previous scheme; principally in relation to the design of the replacement building; its proportions and features that were considered to unduly increase its visual massing and prominence in the sensitive landscape. To a greater degree, these issues have been addressed; the changes to the materials palette, roof line, glazing shapes, sizes and proportions have all been reduced or amended to reduce visual prominence. Subject to high quality materials and finishes, the replacement building would not now be considered to be overly prominent or harmful to character.

There is also opportunity to secure enhancement to the character and appearance of the site. The removal of the flat-roofed swimming pool building would remove a built feature noticeably extending seawards of the building line on this stretch of the South West Coast Path. Its removal would improve close-proximity views from the coast path.

If we accept the arguments given for the need to replace the hotel with a building accommodating the level of accommodation now proposed, in light of the changes made to the scheme in the latest iteration, I would withdraw my previous objection on landscape grounds to the design and massing of the building. I would consider that on balance the changes to the site as a whole resulting from the proposed development would not conflict with the landscape policy objectives previously quoted.

In respect of the landscape proposals, I understand from the planning statements that the frontage hedgerow is now to be retained following my earlier objection, but can't see an updated version of the landscape plan with the current submission showing this detail. If you were minded to recommend approval, this would need to be secured by condition if not on an approved plan.

The proposed development is considered to be acceptable in terms of design and landscape impact

Neighbour Amenity:

Concerns have been raised about the impact on neighbour amenity from the proposed development, in particular the impact on the neighbour to the south, Cliff House. Concerns raised include overlooking, loss of light, noise and impact of traffic.

As the new building will sit north of Cliff House there will be no significant loss of direct sunlight. There are no windows in the southern elevation of the new building and the first floor terraces will have 1700 privacy screens on the southern side. As such there will be no significant overlooking of Cliff House

To the east of the site is a chalet bungalow, Westward. The east elevation of the existing hotel already has first floor windows and a first floor terrace on one end looking towards Westward. The proposed building includes first floor windows and small gable windows at second floor. There will also be stairs up to first floor doorways. The east side of the site, adjoining the boundary with Westward will be used for parking as it is at present.

Impacts on neighbour amenity with regard to any loss of light, privacy and noise are considered to be acceptable and accord with policies DP3 and DEV1 of the adopted and emerging development plans. The issue of highway impact on amenity will be considered below.

Open Space Sport and Recreation

SHDC Core Strategy Policy CS8 and SHDC Development Plan Policies DPD (2010) Policy DP8 set out the rationale for seeking OSSR provisions as key infrastructure for securing the delivery of sustainable development and meeting the various needs of the community. Levels of reasonable contributions based upon existing deficiencies and future demand for various OSSR provisions are detailed within the SHDC OSSR SPD (2006).

The application is for the demolition of the existing hotel (comprising 14 guest bedrooms and 4 staff bedrooms) and replacement with 9 holiday let apartments (16 bedrooms), 1 unit of managers accommodation (2 bedrooms) and 5 residential apartments (2 x 3 bedrooms and 3 x 2 bedrooms).

The proposed development is unable to incorporate levels of open space, play and pitch as required by policy on site at the proposed development, however the additional new residents (within the five

residential apartments) will generate increased pressure on existing local open space, sports and recreation facilities off site within Hope Cove.

A financial contribution will therefore be required in accordance with the SHDC OSSR SPD to assist with making the local facilities sustainable. On the understanding that the proposal is for 2 x 3 bed residential apartments and 3 x 2 bed residential apartments, which applying Table 3 of the SPOD gives an anticipated 15.5 occupants, a contribution of £15,112.50 should be sought.

The contribution would be used towards the following OSSR projects which have been identified in Hope's Cove:

- New roof for the Fishermans Reading Room (which is regularly used by various groups including a play group and is a meeting area for training for Stand Up Paddle boarding (SUP) and Kayaking sessions which set off from the nearby beach. The outside garden area is also used by local groups including the pre-school); and/or
- Creation of a parish circular walk (installation of waymarkers and production of a leaflet); and/or
- Provision of shower unit at the beach to serve sporting activities such as SUP, Kayaking, Bodyboarding, Surfing and Canoeing; and/or
- Improvements to the South West Coast Path (improving the surface of the 1km disabled access path at Bolberry Down and improved gate onto SWCP at Hope Cove entrance to Bolt Tail as current access very narrow); and/or
- Creation of running guide for Bolt Head to Bolt Tail area including production of a map and installation of waymarkers on the ground

Highways/Access:

The Highway authority have considered this application in the light of the existing use and potential traffic generation. On this basis the Highway Authority are satisfied that the impacts of the traffic to and from the development are acceptable, raising no significant increase in traffic numbers and raise no objection.

The Highway Authority have also considered parking provision, which has been increased during the life of this application to 26 spaces. The Highway Authority raise no objections to this proposed layout. It is considered the number of parking spaces proposed is reasonable noting the size of the units – i.e. the number of bedrooms. The Highway Authority has requested :

- 1 space per 1 bedroom unit
- 2 spaces per 2 -3 bedroom units
- 3 spaces per 4 bedroom plus units

This would equate to a requirement for 25 spaces and 26 are provided. Tracking diagrams have illustrated that all the spaces are useable and there is no reliance on garages or tandem parking.

Strong objections have been made to the application having regard to the potential for over spill parking in Grand View Road which is narrow road already suffering from congestion. The Police AOL has also objected on these grounds although at that time only 16 parking spaces were proposed.

It has been suggested that parking of items such as boats in the car park cause cause overspill into the road.

The proposed number of parking spaces meet the requirements of DCC, and this Council has no policy that requires a greater provision, nor is it reasonable to suggest that provision needs to take into account potential parking of boats where this is not a requirement in other tourism related developments.

It is considered that impacts on the safety and convenience of users of the highway is acceptable

Drainage

The application has been considered by Devon Flood Risk who raise no objections subject to conditions. South West Water raise no objections to the application.

Housing provision

The proposed development will provide 5 market homes, 3 x 2 bed and 2 x 3 bed. This number of units is below the threshold whereby contributions towards affordable housing can be requested.

The provision of market homes can be a social benefit however and in this case where house prices are high, being smaller than many new homes, may be more affordable to local people.

It is acknowledged that the market houses could be bought and used as second homes, the Council does not have policies to prevent this. If they are used as second homes however they may be let out adding to the tourist accommodation in the village to the benefit of the local economy.

Ecology

The application is supported by an Ecological Appraisal, 2018 which considered amongst other matters, bats. No evidence of bats or nesting birds was found.

Ecological impacts of the development are acceptable

Planning Balance

The proposed development accords with adopted and emerging policy with regard to the protection of tourism accommodation and employment. The impacts of the development are acceptable with particular reference to design, landscape, highway impact and impact on residential amenity. The proposal is sustainable development that accords with the development plan and as such it is recommended that conditional planning permission be granted.

This application has been considered in accordance with Section 38 of the Planning & Compulsory Purchase Act 2004

Planning Policy

Section 70 of the 1990 Town and Country Planning Act requires that regard be had to the development plan, any local finance and any other material considerations. Section 38(6) of the 2004 Planning and Compensation Act requires that applications are to be determined in accordance with the development plan unless material considerations indicate otherwise.

The relevant development plan policies are set out below:

South Hams LDF Core Strategy

CS1 Location of Development

CS7 Design

CS9 Landscape and Historic Environment

CS10 Nature Conservation

CS11 Climate Change

Development Policies DPD

DP1 High Quality Design
DP2 Landscape Character
DP3 Residential Amenity
DP4 Sustainable Construction
DP5 Conservation and Wildlife
DP6 Historic Environment
DP7 Transport, Access & Parking
DP12 Tourism and Leisure
DP14 Protection of Employment Land

Emerging Joint Local Plan

The Plymouth & South West Devon Joint Local Plan is currently undergoing a main modifications consultation (22 Oct – 03 Dec 2018) as part of the examination in public to determine the soundness of the plan. The National Planning Policy Framework provides guidance on the weight that can be given to policies in emerging local plans in paragraph 48:

48. Local planning authorities may give weight to relevant policies in emerging plans according to:

a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)

The JLP is nearing the conclusion of the examination process, and can be considered to be at an advanced stage of preparation.

Whilst technically all objections are unresolved until the Inspectors' issue their Final Report, some policies which did not receive objections at the Reg 19 stage could be given very significant weight. The nature and scope of objections made regarding each policy have been taken into account when determining the weight to be apportioned to each emerging policy.

The Council consider that the emerging policies are all compliant with the NPPF. It should be noted that the JLP is being examined against the provisions of the 2012 NPPF, and therefore for the purposes of paragraph 48 of the NPPF policies should also be assessed for their conformity against the 2012 NPPF.

In considering the merits of this proposal, case officer recommendations are informed by the weight that can be attributed to emerging JLP policies and adopted development plan policies, as well as the degree of conformity with the new NPPF.

PLYMOUTH AND SOUTH WEST DEVON JOINT LOCAL PLAN -: PUBLICATION (as considered by the Full Councils end Feb/Early March 2017)

SPT1 Delivering sustainable development
DEV1 Protecting amenity and the environment
DEV2 Air, water, soil, noise and land
DEV3 Sport and recreation
DEV4 Playing pitches

DEV8 Meeting local housing need in the Thriving Towns and Villages Policy Area
DEV9 Accessible housing
DEV10 Delivering high quality housing
DEV14 Maintaining a flexible mix of employment sites
DEV15 Supporting the rural economy
DEV19 Provisions for local employment and skills
DEV20 Place shaping and the quality of the built environment
DEV21 Conserving the historic environment
DEV24 Landscape character
DEV25 Undeveloped coast
DEV27 Nationally protected landscapes
DEV28 Protecting and enhancing biodiversity and geological conservation
DEV29 Green and play spaces (including Strategic Green Spaces, Local Green Spaces and undesignated green spaces)
DEV30 Trees, woodlands and hedgerows
DEV31 Specific provisions relating to transport
DEV34 Delivering low carbon development
DEV35 Renewable and low carbon energy (including heat)
DEV37 Managing flood risk and Water Quality Impacts
DEV38 Coastal Change Management Areas

Considerations under Human Rights Act 1998 and Equalities Act 2010

The provisions of the Human Rights Act 1998 and Equalities Act 2010 have been taken into account in reaching the recommendation contained in this report.

Proposed conditions in full

1. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which this permission is granted.

Reason: To comply with Section 91 of the Town and Country Planning Act, 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall in all respects accord strictly with drawing numbers:

Reason: To ensure that the proposed development is carried out in accordance with the drawings forming part of the application to which this approval relates

3. Notwithstanding any details shown on the approved plans, prior to their installation details / samples of facing materials, and of roofing materials to be used in the construction of the proposed development, including details of balcony balustrading, shall be submitted to and approved in writing by the Local Planning Authority. The roofs shall be constructed using natural slate roofs, nailed in the traditional way and not clipped, with slate material samples to be submitted to and agreed with the Local Planning Authority.

The development shall then be carried out in accordance with those samples as approved.

Reason: In the interests of visual amenity.

4. Prior to development continuing above slab level details of a minimum of 10 integral nest sites (swift bricks) to be provided within the site shall be submitted to and agreed in writing by the Local Planning Authority. The nest sites shall be provided in accordance with the approved details prior to the occupation of the building and shall be retained for the lifetime of the development.

Reason: In the interest of biodiversity.

5. Prior to the commencement of development details showing how the existing hedges and/or trees will be protected throughout the course of the development shall be submitted to and approved in writing by the local planning authority. The details shall include a tree and hedge protection plan, in accordance with BS:5837:2010, which shall include the precise location and design details for the erection of protective barriers and any other physical protection measures and a method statement in relation to construction operations in accordance with paragraph 7.2 of the British Standard. Development of each phase shall be carried out in accordance with the approved tree and hedge protection plan.

Reason: In the interests of visual and residential amenity.

This needs to be a pre-commencement condition to ensure the protection of the trees/hedges before any activity commences on site.

6. Vehicle Parking and turning shall be laid out in accordance with the approved plans and shall be made available for use by occupants of the apartments/dwellings(s) to which it relates prior to the occupation of the related apartment(s)/dwelling(s). Parking areas shall be retained for the primary purpose of the parking of private vehicles or commercial vehicles directly related to the operation of the holiday letting units only for the lifetime of the development and shall not be used for boat, trailer, caravan or similar types of non-car storage.

Reason: In the interests of the safety and convenience of users of the highways and in the interests of amenity

7. Prior to the first planting season following commencement of the development hard and soft landscaping details which shall include detailed landscape designs and specifications for the site shall be submitted to and approved in writing by the Local Planning Authority.

The landscape designs and specifications shall include the following:

(a) Full details of planting plans and written specifications, including cultivation proposals for maintenance and management associated with plant and grass establishment, details of the mix, size, distribution, density and levels of all trees/hedges/shrubs to be planted and the proposed time of planting. The planting plan shall use botanic names to avoid misinterpretation. The plans should include a full schedule of plants;

(b) A specification for the establishment of trees within hard landscaped areas including details of space standards;

(c) Details of any changes of level across the site to be carried out.

(d) Details of ground preparation prior to importation of topsoil, including decompaction of material and removal of any debris including plastic, wood, rock and stone greater in size than 50mm in any dimension;

(e) Details, including design and materials, of ancillary structures such as bin stores and signage, gates, sculptural features, etc;

(f) Details of all boundary treatments

(g) Details of hard landscape materials including samples if requested by the local planning authority;

(h) A timetable for the implementation of all hard and soft landscape treatment

All hardsurfacing, planting, seeding or turfing comprised in the approved details of landscaping, shall be carried out in accordance with the approved timetable for implementation. Any trees or plants which, within a period of 5 years from the completion of any phase of the development, die, are

removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species as those originally planted, unless the local planning authority gives written consent to any variation.

Reason: In the interests of visual and residential amenity

8. No works to or removal of boundary vegetation shall take place until a landscape management plan has been submitted to and approved in writing by the LPA. Thereafter the landscape management shall be strictly adhered to for the lifetime of the development

Reason: In the interest of visual amenity and biodiversity.

9. Prior to occupation of the first dwelling, if exterior lighting is to be provided, a detailed outdoor lighting scheme shall be submitted to and approved in writing by the local planning authority. Such a scheme shall specify the method of lighting (if any) (including details of the type of lights, orientation/angle of the luminaries, the spacing and height of lighting columns/fixings), the extent/levels of illumination over the site and on adjacent land through the submission of a isolux contour plan and measures to be taken to contain light within the curtilage of the site. The scheme shall be implemented in accordance with approved details and shall thereafter be maintained as such.

Reason: In the interests of visual amenity; to protect existing and future residential amenity; and in the interests of biodiversity.

10. Prior to commencement of any part of the site the Planning Authority shall have received and approved a Construction Management Plan (CMP) including:

(a) the timetable of the works;

(b) daily hours of construction;

(c) any road closure;

(d) hours during which delivery and construction traffic will travel to and from the site, with such vehicular movements being restricted to between 8:00am and 6pm Mondays to Fridays inc.; 9.00am to 1.00pm Saturdays, and no such vehicular movements taking place on Sundays and Bank/Public Holidays unless agreed by the planning Authority in advance;

(e) the number and sizes of vehicles visiting the site in connection with the development and the frequency of their visits;

(f) the compound/location where all building materials, finished or unfinished products, parts, crates, packing materials and waste will be stored during the demolition and construction phases;

(g) areas on-site where delivery vehicles and construction traffic will load or unload building materials, finished or unfinished products, parts, crates, packing materials and waste with confirmation that no construction traffic or delivery vehicles will park on the County highway for loading or unloading purposes, unless prior written agreement has been given by the Local Planning Authority;

(h) hours during which no construction traffic will be present at the site;

(i) the means of enclosure of the site during construction works; and

(j) details of proposals to promote car sharing amongst construction staff in order to limit construction staff vehicles parking off-site (k) details of wheel washing facilities and obligations

(l) The proposed route of all construction traffic exceeding 7.5 tonnes.

(m) Details of the amount and location of construction worker parking.

(n) Photographic evidence of the condition of adjacent public highway prior to commencement of any work;

(o) Details of noise impacts and controls

(p) Dust impact assessment and proposed control in accordance with the Institute of Air Quality Management guidance for dust assessment from construction sites.

This approved CEMP shall be strictly adhered to during the construction of the development hereby permitted, unless variation is approved in writing by the Local Planning Authority.

Reason: In interests of the safety and convenience of users of the highway, the in interests of residential amenity and in the interests of biodiversity.

This needs to be a pre-commencement condition as the agreed details need to be implemented immediately upon commencement of development or prior to the commencement of development.

11. Prior to the laying of any new foundations details of the levels of all new buildings, parking and landscaped areas shall have previously been submitted to and approved by the Local Planning Authority. Development shall take place in accordance with the approved details.

Reason: In the interests of visual and residential amenity.

12. Units 6 – 9 and 11 – 15 inclusive of the apartments hereby permitted shall be used solely as holiday letting accommodation and shall not be occupied as any person's sole or main place of residence. The owners/operators shall maintain an up-to-date register of the names and main home addresses of all owners/occupiers of the holiday unit, and shall make this information available at all reasonable times to the Local Planning Authority.

Reason: The development proposed is on a site area where there is a presumption against the loss of tourism accommodation.

13. Unit 10, as identified on the approved plans, shall only be occupied by a person(s) whose sole or main employment is related to the management of the nine holiday letting units hereby approved, their spouse and any dependants and to no other person(s).

Reason: The development is proposed on a site where there is a presumption against the loss of tourism accommodation and where only a limited number of open market dwellings would be acceptable and because if this apartment were an open market dwelling a financial contribution towards affordable housing would be required.

14. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, an investigation and risk assessment and, where necessary, a remediation strategy and verification plan detailing how this unsuspected contamination shall be dealt with.

Following completion of measures identified in the approved remediation strategy and verification plan and prior to occupation of any part of the permitted development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority.

Reason: No site investigation can completely characterise a site. This condition is required to ensure that any unexpected contamination that is uncovered during remediation or other site works is dealt with appropriately.

15. Prior to commencement of development the applicant shall submit for approval, full details of proposed electric vehicle charging points to be provided, these details shall include the location, number and power rating of the charging points. This shall accord with good practice guidance on mitigating air quality impacts from developments produced by the Institute of Air Quality Management. This agreed scheme shall be implemented as agreed and available for use prior to first occupation of any building approved by this permission, and retained as such.

Reason: In the interests of air quality

16. No part of the development hereby permitted shall be commenced until a programme of percolation tests has been carried out in accordance with BRE Digest 365 Soakaway Design (2016), and the results approved in writing by the Local Planning Authority, in consultation with Devon County Council as the Lead Local Flood Authority. A representative number of tests should be conducted to provide adequate coverage of the site, with particular focus placed on the locations of the proposed infiltration devices/permeable surfaces.

Reason: To ensure that surface water from the development is discharged as high up the drainage hierarchy as is feasible.

Reason for being a pre-commencement condition: This data is required prior to the commencement of any works as it will affect the permanent surface water drainage management plan, which needs to be confirmed before development takes place.

17. No part of the development hereby permitted shall be commenced until the detailed design of the proposed permanent surface water drainage management system has been submitted to, and approved in writing by, the Local Planning Authority, in consultation with Devon County Council as the Lead Local Flood Authority. The design of this permanent surface water drainage management system will be in accordance with the principles of sustainable drainage systems, and those set out in the Surface Water Drainage Strategy dated August 2018 Project Number 0318 Rev A.

Reason: To ensure that surface water runoff from the development is managed in accordance with the principles of sustainable drainage systems.

18. Reason for being a pre-commencement condition: A detailed permanent surface water drainage management plan is required prior to commencement of any works to demonstrate that the plan fits within the site layout, manages surface water safely and does not increase flood risk downstream.

Advice: Refer to Devon County Council's Sustainable Drainage Guidance.

19. No part of the development hereby permitted shall be commenced until the detailed design of the proposed surface water drainage management system which will serve the development site for the full period of its construction has been submitted to, and approved in writing by, the Local Planning Authority, in consultation with Devon County Council as the Lead Local Flood Authority. This temporary surface water drainage management system must satisfactorily address both the rates and volumes, and quality, of the surface water runoff from the construction site.

Reason: To ensure that surface water runoff from the construction site is appropriately managed so as to not increase the flood risk, or pose water quality issues, to the surrounding area.

Reason for being a pre-commencement condition: A plan needs to be demonstrated prior to the commencement of any works to ensure that surface water can be managed suitably without increasing flood risk downstream, negatively affecting water quality downstream or negatively impacting on surrounding areas and infrastructure.

Advice: Refer to Devon County Council's Sustainable Drainage Guidance.

20. Prior to the occupation of any of the apartments hereby approved a Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall set out means to encourage staff working at the site to access the site using means other than the private car, or if a car is to be used to demonstrate how car sharing will be promoted and achieved. The plan shall set out a mechanism for the on-going implementation and monitoring of the provisions of the plan for the lifetime of the development, the details of which shall be made available to the Local Planning Authority within 10 working days of request.

Reason: In the interests of the safety and convenience of users of the highway and in the interests of air quality.