

LEE & LINCOMBE RESIDENTS ASSOCIATION

Chairman: Mr. Eric Couling [REDACTED]

Hon. Treasure: Mr. Paul Thom

Secretary: Mr. Paul Scarrott, Ivy Bank, Lee, EX34 8LN, [REDACTED]
[REDACTED]

31st August 2017

Mr. R Pedlar
Case Officer, Strategic Development and Planning,
North Devon Council, Lynton House, Commercial Road
Barnstaple, EX31 1DG

Subject: LEE BAY HOTEL amended planning application (63167)

Dear Mr Pedlar,

Lee and Lincombe Residents Association OBJECT to this planning application and its later amendments. The changes make no material difference to the reasons for our opposition, and are minimal and cosmetic in nature.

In summary, we feel that this amended proposal does not enhance or preserve the beauty and heritage of the Bay, the coastal path, and the Conservation Area. Nor does the proposal give anything back to the community at large or within the villages. We owe a 'duty of care' to the generations to come, our children's children, that cannot be overcome for reasons of expediency.

There are alternatives. The residents understand the need to develop the site and the association has presented its desired outcomes to the Chief Planning Officer. Our preferences are for low density housing of a village style design, a bijou hotel or seafront café/restaurant, and open public gardens. A consortium of villagers has been working with the Community Land Trust and a developer to secure their aim of "delivering a high quality and well managed development that will enhance the heritage and beauty of the Bay, at the same time providing low cost housing for locals". In short, we have an option that would meet the needs of residents and visitors that could be provided at a scale and mass that doesn't ruin the Bay.

The suggested provision of 23 new dwellings in three blocks is completely at odds with the Lee Conservation Area Character Appraisal that the Council has commissioned and is looking to extend! The application does not meet any of the SEVEN success criteria for the hotel site described at paragraph 9.10 of the appraisal. In particular, the need to provide a varied roof scape, high architectural standard, public accessible open spaces, and by avoiding urban designs lacking local distinctiveness.

In detail, our case is:

1. This proposed development is in a Conservation Area. It fails to preserve or enhance the character and appearance of the Conservation Area contrary to statutory requirements Planning (Section 72 Listed Buildings and Conservation Areas) Act 1990. Because -
 - a. The heritage asset of the hotel will be demolished. It will not be replaced by anything equally aesthetic or of merit.
 - b. The buildings' materials and architecture do not enhance or blend with the Grade II listed Mill, Smugglers' Cottage and the White House directly adjacent.
 - c. 23 new residences and three car parks will not provide a pleasing reception to tourists or walkers arriving at their destination on the coastal path or when visiting the bay.
2. This proposed development, because of its scale, massing, height and design would be detrimental to the conservation and enhancement of the designated Area of Outstanding Natural Beauty in conflict with Policies DVS1, ENV3 and ENV5, and paragraphs 115 and 116 of the NPPF. Our reasons are:
 - a. The implausibility of 23 new residences with this design enhancing a heritage coastal path.
 - b. This is a major development within an area of outstanding natural beauty and would represent a 23% increase in housing within Lee and Lincombe, and a 100% increase within the conservation area.
 - c. This AONB has the highest status of protection in relation to landscape and scenic beauty.
 - d. There is no evidence that this development is in the public interest.
 - e. There is no assessment of developing elsewhere outside the designated area, or meeting the perceived need for it in some other way.
3. This proposal does not represent sustainable development contrary to Policy DVS1A. Our reasons are:
 - a. There are insufficient facilities and access for the community: much of the landscaped plot would be for the sole use of the owner occupiers; there is a small café placed at the rear of the public car park away from the seafront – this is derisory and completely insufficient; apart from a small terraced area and public toilets there are no other amenities for tourists, visitors, or village residents.
 - b. There is no housing need assessment for 23 new homes at this location, or whether such homes will generate permanent residency.
 - c. There is no provision for affordable housing – not even one.
 - d. The design and location suggest their use would be as holiday lets or second homes; Lee and Lincombe only have permanent occupation of about 50% and this would decrease further.
 - e. Once completed there is no evidence that there would be any significant benefit to the local economy.
 - f. The infrastructure is insufficient to support 23 new homes: the roads are single track, there is insufficient paving, there is no village shop, and no school within reasonable distance.
4. The existence of the Hotel on the site is often given in mitigation. However, a hotel with open amenities, well designed, and aesthetically pleasing could be more sustainable and in keeping with heritage and visible assets.

5. The Crime and Disorder implication is that the public toilets should have similar opening to the café, this would be a diminution of the current availability of this important facility.
6. The survey undertaken by the LLRA in 2016 of all residents clearly expressed a wish for a restaurant or significant café on the sea front.
7. There is no facility for back packers or similar making their way along the coastal path.
8. There is no clear plan for the long-term maintenance of the site.
9. Despite repeated requests by the LLRA, to date there has been no contact with the LLRA from either the land owner or the developer.
10. The Lee Conservation Area Character Appraisal lays out seven criteria for the development of the site that this application does not comply with:
 - a. A robust sense of enclosure along the main road
 - b. A varied roof scape, as these will be prominent from elevated viewpoints
 - c. A high architectural standard which takes design cues from prevalent local styles where possible
 - d. Reflect the varied and eclectic forms of building within the village avoiding standard urban designs with no distinctiveness
 - e. Provide open space accessible by the public
 - f. Enhance through landscape design the condition of the valley setting
 - g. Maintain open elements to avoid harm to the significant contribution undeveloped spaces make to local character.
11. The representations from Historic England describing the harm this application would bring to the conservation area and questioning:
 - a. Whether the viability of the site has been thoroughly tested by the council to secure not the most profitable one but the one most compatible with conservation
 - b. The scale and massing of the existing hotel that is not a typical feature within the conservation area, and therefore the loss of which does not justify a replacement of similar size.

Yours sincerely,

Eric Couling

Chair LLRA