



THE DARTMOUTH & KINGSWEAR SOCIETY

For the preservation and promotion of good Civic Design and the protection of Natural Surroundings

Registered Charity no. 1038254

President: Sir Geoffrey Newman, Bt
Chairman: Doug Twigg
Hon Secretary: John Baldock

c/o the Flavel,
Flavel Place,
Dartmouth,
TQ6 9ND

25 November 2009

Planning and Building Control,
South Hams District Council,
Follaton House,
Plymouth Road, TOTNES,
TQ9 5NE

Dear Sirs,

Re: Planning Application for Noss-on-Dart Development
Reference no.: 30/1504/09/O

Further to our letter of 24 September 2009, we are writing to express in further detail the Society's **objection** to the current Planning Application for the Noss re-development. The Society is the local amenity group covering Dartmouth and Kingswear together with adjoining parishes and the River Dart; our key objective is to maintain and enhance the attractiveness of the area. With some 400 members, we are closely concerned with any major development such as proposed at Noss.

We believe that redevelopment of the site does need to take place and welcome the economic activity and jobs which would be created. However development needs to proceed in a balanced way respecting the local environment and we consider that several elements of the current proposal are highly inappropriate. We note that many organisations have already expressed their objections and concerns (including the Environment Agency, Dart Harbour & Navigation Authority, The National Trust and the South Hams AONB Unit). These submissions have set out many specific points which we support, summarised in paragraphs a) to f) below.

However we wish to highlight one aspect which should receive close attention, which is the **height and positioning of the buildings sited close to the river**. The maximum elevation of the buildings closest to the river (buildings R1, R2, & R9-10 on Parameter Plan 5) is shown as 22.5 metres above Ordnance Datum; this is equivalent to 25.1m (some 82 feet) above Chart Datum in the river. We submit that such buildings would be totally overbearing in their current location, adjacent to the river and indeed built out over the water in places. The effect would be of a dense urban development protruding far into the estuary, visible from many viewpoints upstream and downstream as well as on the river. The visual impact at night-time would be particularly intrusive.

We are also very concerned about the layout of the buildings behind the river frontage. These have similar maximum elevations and are set very close together; the effect would be of densely packed urban canyons. This is in contrast to the arrangement further back from the river (to the east) where building heights and visual impacts are much lower. In summary the largest building elements have been sited in the most prominent positions where they would have the most adverse impact on the surrounding environment. We note that the promoters' own Environmental Statement comments that the residual visual impact of the development when seen from the river would be 'Major Adverse'.

Other aspects of the proposals which we are very concerned about and which have been raised by other parties include:

- a) The existing distinctive character of the site with its industrial marine heritage would be destroyed and replaced by the very densely placed buildings which would completely urbanise the site.
- b) The proposal extends the boundaries of previous development of the site by a large margin into unspoilt areas of the AONB, contrary to several national planning policies. It seeks to reclaim land from tidal mud flats and to extend over the river on piles.
- c) The marina would be greatly expanded (92% increase on existing number of berths) far beyond the land limits of development and in front of river margins currently undeveloped.
- d) The development contains an unbalanced mix of uses, dominated as it is by residential/hotel development which would completely overshadow the marine business sector and threaten its viability, by restricting the uses and operations allowed.
- e) Too small an area has been allocated to boat storage. For safety and operational reasons many boats on the Dart need to be brought ashore in the winter. In the past, Noss has provided a major proportion of this storage but only a small fraction of those boats can be accommodated in the new development. Consequently operation of a boat yard at Noss might well become unviable with so little space and restrictions on working practices.
- f) Such a large urban development in a location with poor transport links can hardly be in accord with policies for sustainable development.

We believe that a revised design for redevelopment of the Noss site could be drawn up which would respond to the above objections while still providing an economically viable scheme. We call upon South Hams District Council to reject the current application and encourage such a re-design.

Yours truly

RDH Twigg

Doug Twigg,
Chairman, Dartmouth & Kingswear Society

Copies to:
South Devon AONB Unit
Dart Harbour & Navigation Authority
Kingswear Parish Council
Cllrs H. Bastone, J. Hawkins, M. Stone