From: 07 November 2018 20:34
Sent: Planning (SMDC)
To: Objection Letter - Application
Subject: SMD/2018/0649

Dear Mr Swithenbank,

Ref: SMD/2018/0649 – Outline application with all matters reserved for 1 new dwelling in replacement of the various garage structures on land adjacent to 36 Sandon road

I write in connection with the above application as a resident at 34 Sandon Road, Cresswell, ST11 9RB. I have examined the plans and wish to **strongly object** to the development of 1 dwelling in this location for the following reasons.

1) Inappropriate Development in the Green Belt

The entirety of this development and its boundary is located within Green Belt land. In accordance with Policy H1 item 6 of the emerging Staffordshire Moorlands Local Plan, national Green Belt policy should apply for any new housing development in Green Belt land. Greater weight should also be given to this plan having now been submitted for examination and it being at an advanced stage, in accordance with Paragraph 48 of the revised National Planning Policy Framework (2018).

National Green Belt policy should be given great weight for the consideration of this development. Paragraph 133 of the NPPF (2018) states the following:

"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".

Paragraph 144 of the NPPF (2018) then states the following:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations".

Paragraph 145 of the NPPF (2018) then states the following:

"A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

1. *buildings for agriculture and forestry;*

2. *the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*

3. *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*

4. *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*

5. *limited infilling in villages;*

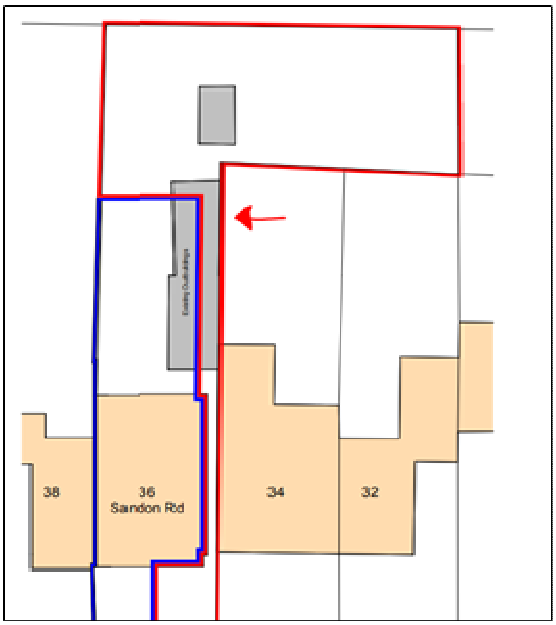
6. *limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*

7. *limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

The above evidence demonstrates the substantial weight that should be given to oppose this development. Only 'd)' of Paragraph 145 of the NPPF is applicable here, as the site is not previously developed land and is not an extension or alteration of an existing building. However, the proposed development also fails to meet any of the very special circumstances where exceptions can be made under this policy. Firstly, the development is not in the same use, (this is an additional dwelling, rather than an extension or alteration to any existing building). Secondly, and importantly, the proposed development is *considerably* materially larger than the 'various garage structures' the application seeks to replace. For these reasons, as well as to protect the openness and permanence of the Green Belt, substantial weight should be given to rejecting the application.

2) <u>Loss of Residential Visual Amenity – Inappropriate Location and Scale</u>

Myself, my family who are also residents at 34, and adjoining neighbours, will all experience a loss in residential amenity from the proposed development. On the submitted plans, no evidence has been given as to the size of the existing outbuildings at 36 Sandon Road. However, I can provide information as to the outbuilding on the border adjacent to 34 (see below for plan and photos of main existing outbuilding as well as lack of visibility of second existing outbuildings from habitable windows at 34 Sandon Road). This outbuilding is currently approximately only half a metre taller than our garden fence panels/boundary. The other existing outbuilding is completely behind a tree in the north west corner of our garden, out of sight from all angles of our property.













The proposed development will result in a *substantial* loss of residential amenity, as the 2-bedroom dwelling (as stipulated in the applicant's application form) will be immensely visually intrusive to the enjoyment of the physical external space of our home. A 2-bedroom dwelling with a 96m^2 floor space is almost guaranteed to be two storeys tall. The proposed development will therefore be well over and above the existing outbuildings at 36 Sandon Road, meaning the tranquillity of our current residential amenity (as shown in the photo above) will be greatly lost due to the development's location and scale. On these grounds, also, the proposed development should be refused.

3) <u>Overlooking and Loss of Privacy</u>

Despite there being no principal windows to the rear of the dwelling, secondary windows can still contribute to a considerable loss of privacy to the amenity of our home and garden, as well as our neighbour's homes and gardens. Weight should also be given to the location of the proposed development in relation to its land boundary with our home, as it seems the dwelling is extremely near, and unreasonably disproportionate, to our property. It is also interesting to note that the location of the proposed dwelling does not overlook 36 Sandon Road, with this house having additional mitigation measures (in the form of vegetation, trees and/or bushes) outlined on the submitted plans to prevent loss of privacy for this dwelling alone. This is extremely telling of the damaging loss of privacy that would be caused to ourselves at 34, as well as other adjoining neighbours such as at 32 and 30, with no inclination of mitigation measures being implemented whatsoever. This principle and design standard is unacceptable in planning terms and should also be given considerable weight in the determination of this application.

4) <u>Loss of Sunlight</u>

Ourselves at 34, as well as neighbours at 32, 30, 28 and 26, will be subject to loss of sunlight by the proposed development, especially later in the day and in the summer months. This also contributes to the overall loss of residential amenity to existing residents such as myself, caused by the inappropriate proposed development.

I will also point out that in addition, residents of the proposed dwelling will experience severe loss of sunlight from the existing dwellings across the length of Sandon Road, as well as the trees and vegetation in their gardens. This is quite clearly not a suitable location for a new dwelling, and the proposed development will also have a particularly low residential amenity. I fail to understand the potential benefits of the proposed development when the existing and proposed residential amenity will decrease as a result.

5) Highways and Vehicular Access

It is clear that this development has not considered the potential of approval of **SMD/2017/0722** 'Approval of Reserved matters following outline permission SMD/2014/0576 for: 1. Phase 1A – New/realigned access road; 2. Phase 1B – Commercial development plot 1 containing a warehouse assembly unit to serve the Greenhouse People Limited; and 3. Phase 1C – New entrance roundabout.' As shown from document reference '17001-103c General Arrangement', this will create a new access point for 34 and 36 Sandon Road, which will be separate from both the layby and the proposed main road.

The proposed new dwelling outlines an extended and widened access point from the highway, not stating if it is shared or bordered between the two dwellings. Should application SMD/2017/0722 be motioned to approve at committee on the 22nd November 2018, the widened access point as part of the proposed new dwelling must be reassessed in accordance with the new road, and any access should not start construction until the full works of the road has been completed.

Alongside the clear incompliance with national Green Belt policy, this development is also incompliant with Policy H1 Item 3e of the emerging Staffordshire Moorlands Local Plan:

"All new dwellings must be of sufficient size to provide satisfactory levels of amenity for future occupiers of the dwellings whilst respecting the privacy and amenity of occupiers of existing dwellings".

The privacy and amenity of occupiers of existing and proposed dwellings has, quite clearly, not been respected. Therefore, for these reasons and on the grounds reasoned above, I wish to again state my strong objection against this development. An outline application with all matters reserved does not negate from the inappropriate location and assumed scale of this 2-bedroom dwelling on Green Belt land.

As a town planner myself, I have attempted to look at this proposal with as much impartiality as possible for the given situation, referring to relevant policy and material considerations that are indeed highly significant for this proposal. Myself and my family who reside at 34 Sandon Road are in fact extremely supportive of appropriate development, offering no objection to planning application **SMD/2017/0569**, for a two-storey side extension and single-storey rear extension to the existing dwelling at 36. We knew that it was clear that no conflict with neighbour amenity arose, as outlined in the decision report. This case, however, presents a significant difference to that of SMD/2017/0569, alongside very special circumstances for a new dwelling in the Green Belt not being demonstrated.

If this application is to be decided by planning committee, please take this as notice that I would like to speak at the meeting of the committee at which this application is expected to be decided. Please let me know as soon as possible the date of the meeting if this is the case.

Yours sincerely,

Alistair Peet