

Staffordshire Moorlands District Council
Planning Department FAO. Head of Planning
Mr B. Haywood
<By Email>

1st August 2022

Dear Mr Haywood

Re: SMD/2022/0275| Reserved matters application pursuant to outline planning permission SMD/2018/0789 (as amended) providing details of scale, layout, appearance and landscaping for the erection of a manufacturing building, together with outdoor storage areas, service yards, parking, landscaping, attenuation ponds and associated infrastructure| Land at Blythe Park, Sandon Road, Cresswell, Staffordshire

The following document represents the views of:

1. Mr L Finlayson, 1 Cresswell Old Road, Cresswell, Stoke-on-Trent, ST11 9RF
2. Mrs C Finlayson, 1 Cresswell Old Road, Cresswell, Stoke-on-Trent, ST11 9RF
3. Ms T Finlayson, The Stables, Cresswell Old Road, Cresswell, Stoke-on-Trent, ST11 9RF

All of whom **OBJECT** to the above development for the following reasons:

Concise Grounds for Objection

- Approval for up to 33,480m² of Use Class B1, B2 or B8 floorspace; alongside 168 new houses, was granted at Outline planning permission in 2014, under application reference SMD/2014/0576. At the time the report submitted stated the 'Noise and Vibration' of the proposals would have 'No Impact' or 'Negligible' impact on nearby receptors.
- A 'variation' to this application was submitted in 2018 under SMD/2018/0789 this would allow the commercial site development and occupation to be brought ahead of the residential development.
- In the 2022 application under SMD/2022/0275 the commercial use of the site is revealed to be for Hill Helicopters, the new proposed site user is likely to generate noise; far beyond what was suggested for an ordinary B1, B2, or B8 use. However, no analysis of the anticipated noise has been conducted. Without this, the proposals fail to comply with Policy E1 of The Adopted Local Plan 2014-2033.
- According to 'Hearing Health Matters': *"Helicopters rank especially high in causing undesirable noise. Eight different studies have found that the annoyance created by a helicopter does not correlate with the decibels it registers. The helicopter's unique sound, created by blade vortex interaction, causes people to rate its sound level as much as 10 dB's higher than it registers, doubling the noise impact. This would place perceived helicopter noise at around 97 dB, or a whopping 30 dB's over the generally accepted noise level of residential areas."*
- The EIA Report submitted in SMD/2022/0275 by 'Knights PLC', simply references the 2014 Outline application with regard to anticipated Noise; this is inadequate, and it will not safeguard the amenity of existing nearby residents, or the proposed dwellings which were approved at Outline stage.
- The Planning Statement by RPS Group briefly mentions a commitment to being "neighbourly" in Paragraph 4.12; however, this also fails to describe noise generated, or methods of attenuation to safeguard amenity. Detailed proposals and assessment are required before any decision, other than a refusal, can be made.

- The proposed operating hours between 7am - 7pm are unrealistic hours to consider the testing / flying of a helicopter; particularly from a site which is proposed to be surrounded by dwellings. The statement by RPS Group goes on to suggest extended business hours from 5am – 11pm, strict flying hours must be imposed on the application site, and these should be limited to a short number of hours notwithstanding the need for attenuation.
- The proposals constitute inappropriate development in the open countryside by virtue that this is previously undeveloped agricultural land, alongside an area of nature conservation. The proposals do not meet the 'special circumstances' in which development would be allowed under Paragraph 149 of the NPPF. There are several farms and equestrian leisure uses nearby to the application site; this proposal poses a threat of the harm of livestock, horses, and other nature, as result of the noise created by helicopter testing. The potential impact on Biodiversity could also be contrary to Policy NE1 of the Local Plan.
- The application site is within a Level 3 'Floodzone' with part of the site being a Level 2 'Floodzone'. Development on the existing agricultural land is likely to result in flooding issues elsewhere in the local vicinity. This is contrary to Policy SD5 of the Local Plan.

Conclusion

The proposal represents a material change to the original Outline Approval of 2014. For this reason, a 'Reserved Matters' application should not be sufficient to consider the impacts of this proposal.

Furthermore, the previously submitted Noise and Vibration assessment is insufficient. A detailed and thorough Assessment with attenuation strategies, agreed flying routes and hours must be submitted in order for an assessment of the proposals to be made.

Without a detailed strategy for Noise attenuation, it is not possible for the local authority to support the proposals submitted in SMD/2022/0275. For this reason, the proposals should be refused permission.

For and on behalf of

Mr L Finlayson, Mrs C Finlayson, Ms T Finlayson,