

From: planningcomments@staffs Moorlands.gov.uk
To: [Planning Comments \(SMDC\)](#)
Subject: Comment Received from Public Access
Date: 14 October 2022 00:04:35

Application Reference No. : SMD/2022/0275
Site Address: Land At Blythe Park Sandon Road Cresswell Staffordshire
Comments by: Luke Emery

From:
31
Rookery Crescent
Cresswell
Stoke-On-Trent
Staffordshire
ST11 9RA
Phone:
Email:
Submission: Objection
Comments: Mr. Ben Haywood

Planning Case Officer

Staffordshire Moorlands District Council

Planning Applications Committee

Moorlands House

Stockwell Street

Leek

Staffordshire

ST13 6HQ

Dear Mr Haywood

Objection to Application for Reserved Matters SMD/2022/0275 ; Land at Blythe Park

Please accept my thanks for your diligence and what is expected to be a comprehensive and objective report concerning this controversial and contentious application, on behalf of Staffordshire Moorlands District Council (SMDC). Naturally, with an application that is so significantly at odds with its surroundings, many residents both from the immediate and surrounding parishes have felt it necessary to raise their concerns with an extraordinary number of comments submitted, approximately 180 at the time of writing almost exclusively consisting of objections, which describe very real concerns with the proposal with which I wholeheartedly emphasise and support.

The applicant seeks to address the reserved matters of appearance, landscaping, layout, and scale pursuant to the amended outline permission associated with application SMD/2018/0789. These specified matters identify the primary scope of this objection; further to those points this objection will explore the sustainability and business activities which are defined within the applicant's documents.

Given the rural nature of Cresswell, being a small hamlet sited within the green fields of the Checkley Ward of the Staffordshire Moorlands, and the limited and historic nature of industrial buildings in the area, it is disappointing to see that the applicant has opted for a building design that is so significantly juxtaposed to its surroundings. The drawings provided by the applicant, and additional detail within the supporting text, indicate that the proposed factory will feature flat panel composite cladding, colour RAL 9005 Black, with matching black trims and copping while the large extent of curtain walling and glazed elements are framed in black aluminium units. Some subtle colour accenting is provided by vivid green trims, back lit in LED. The applicant's report further describes that the previous pitched roof design will not be a visible part of the building design as it would be hidden by a continuous parapet wall set at a height determined by the ridge levels.

 

Such design considerations should be considered against the prescribed policies of the National Planning Policy Framework (NPPF) and relevant, in date, local policies including Design Considerations 1 (DC1), Design Considerations 3 (DC3) and the supplementary planning document titled Staffordshire Moorlands District Council Design Guide (Design Guide SPD).

It does not appear possible to justify the design choices put forth by the applicant with regard to the aforementioned policies. The Design Guide SPD, in section 3.6., stipulates that large buildings should be designed to be as inconspicuous as possible. Section 3.7. provides additional context explaining that the architectural design of new development should be guided through an assessment and understanding of character and context across the area and that design should respond to the local tradition.

The design presented appears to demonstrate only a passing understanding of the local character with a minor gesture comprising of 15cm of Staffordshire Blue Engineering Brick above the finished ground floor level, as demonstrated in the document titled Elevations.

The design effectively, from the perspective of an observer on the ground, deletes the pitched roof design from the previously approved design which increases the eaves height of the proposed building by the addition of a parapet wall set to meet the ridge height of the building therefore not ensuring that the building achieves a low profile to mitigate the visual impact of the development. This effect is worsened by the decision to make the, now proposed to be significantly wider, three portal span appear as one enormous roof which directly contravenes the advice given in the Design Guide SPD, section 3.6. No effort has been made to alleviate the apparent bulk of the building. This results in a scenario where the design cannot be considered to conform to the requirements set out by policy DC3, as the aforesaid failure to adhere to the Design Guide SPD would lead to prominent intrusion into the countryside. Residents' comments demonstrate a mandate to agree with the summary provided within the policy that the natural environment in the district is one of the Staffordshire Moorland's greatest assets and welcome the guidance from the NPPF which identifies the need for council policies to maintain and enhance the inherent value of the countryside.

Furthermore, given the well-established precedent of more subtle, green manufacturing facilities in the local area, which is conformed to by a major economic contributor, JCB, it would not be expected that a recommendation could be made to permit what would be a significantly more limited operation to forgo the same restrictions. Similarly, within the vicinity to the proposed site, one of the very few facilities which is both in walking distance and services residents of the hamlet of Cresswell, Draycott Racquet and Fitness Club, conformed to the neutral and less conspicuous tones of a green colour palette for their extension to include indoor courts. This clearly establishes a standard which is to be adhered to within the local area.

The contemporary design of the facility contrasts poorly against the historic infrastructure which presently makes up the majority of the site from which the proposal extends. The historic nature of the buildings in the former colour works contribute positively to the unique character of Cresswell. From many angles of the exterior of the site, and even many within the perimeter of the site, a passer-by is greeted by the traditional architecture present.

Such a design neither appropriately satisfies the historic architecture nor policy DC3, point 4, by failing to use materials which are sympathetic to the landscape, a point which must be given the utmost consideration when the proposal is sited within a special landscape area (SLA); as identified in a previous inspector's report.

The scale of the proposed factory does not conform to the local landscape nor the neighbouring buildings, contrary to the practices prescribed within sections 3.8. and 3.10. of the Design Guide SPD which concern any new development respecting the scale and proportions of neighbouring buildings. If one travels eastward across the former colour works, the buildings which would neighbour the proposal are single storey, workshop style structures; it cannot be considered acceptable for such a substantial and immediate leap in scale to be constructed. Policy DC1 stipulates that development should be well designed and should respect the site and its surroundings and promote a sense of place and identity through its scale, height, density, layout, siting, landscaping, character and appearance; clearly the proposal cannot satisfy the requirements point 2 of that policy.

Previous proposals for the site, identified in the variation to outline permission that this application is pursuant to, demonstrated a significantly smaller primary building than these reserved matters attempt to convey.

Further to the problematic design of the site, significant information is absent from the application. Given the business use identified within the application of aircraft testing, training, and flights, and the presence of VIP parking possibly being indicative of charter-based activities, it is a reasonable assumption that fuel storage would be required at the site; within the border of these plans a storage area is demarcated however no information is provided pertaining to nor any risk assessments for the storage of aviation jet fuel. It is unclear how a committee could reasonably be expected to discharge their duties without full and proper information being provided.

Neighbouring authorities have also noted the deficiencies in information provided, noting that it is expected that missing detail would be of critical importance to the determination of the application.

It has been noted that some detail will be provided with the full application for the 50% of the land parcel which does not currently enjoy any planning permission; it is not clear however, what activities will be conducted within each given part of the proposed site nor how it would be effectively policed to ensure that activities which contribute to noise pollution would not be conducted on the site identified within the scope of these reserved matters. With a service yard clearly falling within the demarcated boundary of this application, ground testing and taxing operations could be possible and would not be expected to be covered by the existing Environmental Impact Assessment; would an incomplete assessment of the proposed impacts be considered valid for the purpose of the application? No fuel storage is demonstrated within the parcel of land pending an application therefore it is assumed that that activity and by extension the risks involved must be considered at the stage of this reserved matters application, is it required that the applicant should be forthcoming with the relevant information for proper risk and environmental assessments?

 

The applicant's comments, in section 7.25 of the Planning Statement that their submission suitably addresses DC1 does not demonstrate a comprehensive understanding of said policy; in fact, the applicant only attempts to justify the proposal against point 1 of that policy which consists of a subjective comment that the largely

featureless box design of the factory building is an example of incorporating creativity; the applicant further comments that detailing and materials are appropriate to the area; there is little tangible evidence in any of the planning documents which support this claim and, barring the minimal use of Staffordshire Blue Brick, the proposal consists of predominantly contemporary materials and detailing such as the vivid green accents identified within the Planning Statement.

When tested against the rest of the DC1 policy, as identified throughout this objection, the proposal does not fair well; the application is not respectful of its surroundings in any way identified within section 2 of DC1; the design and layout fails to reduce the impact of the development; the impact on residential amenity is both high and negative through proposed activities and aesthetic of the proposal; insufficient information has been provided to suitably address how the proposal will maintain and enhance the biodiversity of the area, especially given its proximity to a statutory nature conservation area; a significant issue for development within Cresswell is that suitable, sustainable transport links are not present and the road network in the immediate vicinity is not well suited for cycle users (JMP technical review); the application has not provided satisfactory documentation, or has provided documentation which does not comply with, necessary hydraulic modelling for the drainage associated with the proposed development, which would be sited upon a flood plain.

Policy DC3 provides a mechanism by which the council may refuse this application; section 1 of said policy obligates the Staffordshire Moorlands District Council, and by extension its officers and committees, to protect the local landscape and the setting of settlements in the Staffordshire Moorlands by, Resisting Development which would lead to prominent intrusion into the countryside or have a significant adverse impact on the character or the setting of a settlement or important views into or out of the settlement.

In conclusion, I object to this application on the basis that the impact upon residential amenity would be both severe and negative in nature due to the appearance, scale and layout of the factory facility and activities. The business activities that have been described within the Planning Statement are simply not suitable for a rural hamlet. The application neither provides sufficient information to address the sustainability of a development in a settlement which has been described in previous planning officer reports as not even identified as a small village owing to its lack of services and facilities, nor to suitably adhere to the policies of the Local Planning Authority.

Yours sincerely

Luke Emery

Do you really need to print out this Email? Be green - keep it on the screen.

This email is intended for the addressee(s) only and may contain sensitive, privileged or confidential information that could be protectively marked. If you are not the addressee please do not use the information in any way. If you have received this email in error please notify the sender immediately and delete it from your system. Thank you.

The Council may be required to disclose this email or any responses to it under the Freedom of Information Act 2000. The way in which we handle personal information is set out in our privacy notice and is available at <https://www.staffs Moorlands.gov.uk/YourData>

