

The proposed development of 2 holiday lodges at
Rosehill, Nabb Lane, Alton, Staffordshire (SMD/2024/0108)

This planning application goes against many principles laid out in the SMDC Local Plan including SS1, SS8, SS10, SS11, SD4, E4, T1, DC1, DC2, DC3, SO8, SO9 and SO11. These principles relate to Design Considerations, Historic Environment, Landscape Character, Noise Pollution, Sustainable Transport, Tourism Development and the Objectives and Development Principles of the Churnet Valley and Other Rural Areas.

It is also in conflict with the National Planning Policy Framework including sections 6, 12, 15 and 16. Section 15 says that *'...good design is a key aspect of sustainable development'*, and Chapter 15 says that *'planning decisions should contribute to and enhance the natural and local environment by amongst other matters recognising the intrinsic character and beauty of the countryside and minimising impacts on biodiversity'*

Both the house and garden of Rosehill lie within an HECZ relating to two historic farmsteads - Paradise and New House farms. Both Paradise farm, to the South of the proposed development, and Nabb Cottage to the North, are listed buildings.

The setting of these heritage assets has already been compromised by unsympathetic development of the lodge built on the site following the approval of application SMD/2020/0656. Additional development will further detract from the significance and setting of these listed buildings and Historic Landscape Character.

The Local Plan does support new tourist accommodation, but only where it is needed, and only in appropriate locations. In Alton and the surrounding area the need for tourist accommodation is already met by existing accommodation and provision that already given planning permission. There is no requirement for any additional capacity therefore the proposed development is not needed. The design is inappropriate and unsympathetic to the character of the local area, which the SMDC Conservation Officer called *'unsightly and unattractive shacks'* in the report on the application.

Our house (Ash Croft) is next door to Rosehill. If the proposed lodges are approved the site will hold 16 holiday-makers. It will seriously impact and irreparably harm our human rights and residential amenity – the right to privacy and the quiet enjoyment of our home and garden without noise, odour or light pollution.

We are entitled maintain the **current** level of peace and tranquillity that we currently enjoy. The proposal will make this impossible.

The 'garden grabbing' and unsustainable development of 2 tourist lodges in addition to the 2 lodges already approved in the garden of a residential property would represent a gross over intensification of development of the site and alter the residential character of house and garden of Rosehill itself. It would disrupt the way the local landscape can be read on the approach to the village and irrevocably harm the setting of heritage assets. It would also destroy a huge area of wildlife habitat.

It would generate additional traffic on a narrow lane and at a dangerous junction.

As well as the refusal, on a many different grounds, by the SMDC Planning Officer, there was a damming report by the SMDC Conservation Officer and an objection from Alton Parish Council. In addition, there were 16 objections from individuals. There was not a single submission in support of this application.

The negative impact of this proposed development vastly outweighs any perceived demand for additional tourist accommodation and for all these reasons the decision to refuse this development should be upheld.

Other reasons for upholding the decision for refusal of this application are:

1. The applicant has previously said that *'the proposed lodges, by virtue of their modest size, will not attract large groups....'* Nothing could be further from the truth. The whole site, which already includes similar accommodation for 8 people, would now accommodate 16 people. It is highly likely that groups such as Stag and Hen parties would be looking for exactly this type of venue.
2. Holiday makers behave in a very different way from residents. A family would only host occasional parties or barbeques in their home or garden. Similar lodge accommodation nearby (in Dimmingsdale) is often booked by groups such as Hen and Stag parties. It has led to many complaints by the local residents about noise, litter, and anti-social behaviour. If the proposed lodges were approved we would be exposed to a greater level of disturbance, intrusion and anti-social behaviour than the residents of Dimmingsdale as there would more people at a closer proximity.
3. the Human Rights Act, in particular Protocol 1, Article 1. This states that ***'a person has the right to peaceful enjoyment of all their possessions, which includes the home and other land.'***
4. The proposal is not sustainable. The only public transport is one bus that passes through the village once a day in each direction.
5. Section 18 of the applicants heritage statement specifically says *'I also note that the surroundings of the applicant's paddock, which would be overlooked by the proposed lodges....'* The only way they can overlook the paddock is if the trees screening the lodges from the east are removed. This will harm the historic setting of two listed buildings. The importance of the view from Denstone Lane cannot be underestimated. It is the main route into the village and the Character of the Landscape will be massively adversely affected. It will also have a detrimental effect on the listed Nabb Cottage and its historic setting.
6. The wording of the heritage statement indicates the intention to take out mature trees, that are 6 m tall. This would have a hugely detrimental effect on wildlife.
7. There is no information about how sewerage and drainage will be dealt with. This is particularly relevant as there is no mains drainage in Nabb Lane.

The existing system that was designed for one family will have to accommodate the sewerage of an additional 16 people. It seems unlikely that an old fashioned domestic system has capacity for 20+ people. Also, we do not wish to be disturbed by smell from sewerage generated by 20 people. There is no detail regarding provision of water and power. If Power is provided by a generator this will cause an additional disturbance.

8. The site is already over developed following numerous extensions to the original cottage including SMD/1978/2100 and SMD/2002/0691, both for 2 storey extensions. The SMDC Delegated Decision Report only mentions applications since 2015. The guest accommodation footprint will be larger than that of the house so the development would be is completely out of scale with the surroundings.
9. The lodges would be totally out of place in a rural garden. It is ridiculous to think that the view out of the windows of a character property such as this would be of massive wooden sheds rising over 4m / 13ft from ground level. The view from a residential property should not be dominated by an eyesore of this nature.
10. The new plan only shows the 4 parking spaces. There is no plan showing where the other 4 guest and 3 residents' spaces are to be sited. The highways agency states that they require room for all these cars to turn. This crucial information is missing.
11. Policy DC1 7. states that the proposed development should 'provide for safe and satisfactory access'. **The existing splay is inadequate. There is not enough room for a car to pull off the carriageway while the gates to the property are opened. This leads to the road being blocked as cars on the road are unable to pass.**
12. The driveway of Rosehill is 3m wide and approximately 100 metres in length. Two vehicles, therefore, are not able to pass each other when entering and leaving at the same time. This may necessitate vehicles reversing onto the public highway. With 11 cars on site this could be a regular occurrence. This situation cannot be remedied without dramatically enlarging the entrance which would harm the character of the property.
13. There is no infrastructure for charging cars and no disabled parking.
14. The proposal states that they are aimed at families. Families normally travel together in 1 vehicle, yet they seek to provide two parking spaces per lodge which indicates holidaymakers travelling separately.
15. There is nothing sustainable in pouring 100 square metres of concrete for slabs to accommodate two huge wooden sheds.
16. The restricted access and density of wooden buildings is a fire hazard. 6 metres should be the necessary minimum separation distance as there is a similar condition for caravans, which if anything are less flammable.
17. Timber clad lodges would be harmful to the aesthetic character of the area. **Lodges of the same design type were turned down by SMDC Planning Committee**

(SMD/2019/0646) sitting planning policy SS11 and calling them *'little more than caravans with cladding'*

18. The proposal constitutes 'Garden grabbing' which is discouraged at both local and national level. In June 2010, the Government implemented the commitment to give local authorities the opportunity to prevent 'garden grabbing'. A policy document states: ***Reclassifying garden land will enable councils to protect gardens from inappropriate development by rejecting planning applications for development that is objected to by the local community and spoils the character of neighbourhoods.***

and *'Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.*

19. The Highways agency maintain that Nabb Lane is no different from other similar roads in the area. I disagree because of its close proximity to Alton Towers, the largest tourist attraction in Staffordshire.

This means that the volume of traffic in the area is higher than most other roads. It is constantly used as a shortcut to Alton towers, vastly increasing the flow of traffic on this narrow, single track lane, (with few passing places and many 'blind' corners,) compared to what would be expected in other areas of Staffordshire.

Nabb Lane feeds onto the complex 5-way junction with Denstone Lane (B5032). This proposal will generate additional traffic at this complicated road junction, which becomes extremely congested and dangerous especially for drivers unfamiliar with the area, and particularly during the tourist season.

- 20. The planning statement is incorrect. The ridge height of the lodges is given as 3.4m but this is taken from floor height not ground level. The finished height with the concrete slab and brick base would be as high as 4.6m or more.**

21. The application form is inaccurate. The answers given to the questions regarding Trees and Hedges is incorrect. There are trees and hedges on the proposed site that are earmarked for removal.

22. Paragraph 12 of the applicants Heritage Statement is incorrect. The new lodge granted permission in SMD/2020/0656 has a huge impact on the character of Nabb Lane and the setting of the listed buildings. Photo 1 is misleading and has been manipulated to minimise the visual impact of the existing lodge.

23. I strongly disagree with the applicants' heritage statement that:

14. '... the paddock to the north of the lodges is edged to the west and north by other houses and gardens, and has the appearance of being firmly set within the framework of the village.'

The paddock does not appear to be set within the framework of the village. It is on the opposite side of the road from the village and well outside the village curtilage.

It is viewed on the approach to the village as being outside the village and part of a patch work of traditional fields.

24. Conditions were imposed when application SMD/2020/0656 was granted. The applicant has breached those conditions on many occasions and caused a disturbance by working outside permitted hours and preventing the quiet enjoyment of our home to which we are entitled. Some of these breaches were reported to SMDC Planning Enforcement. This shows a blatant disregard for our residential amenity.
25. The submission states that the lodges will be serviced by the applicants, so they will not provide any employment.
- 26. The negative impact of this proposed development vastly outweighs any perceived demand for additional tourist accommodation in the area.**

There are many areas where this proposal is not in accordance with the Local Plan.

SS11 states that 'any development should be of a scale and nature and of a high standard of design which conserves and enhances the heritage, landscape and biodiversity of the area. Strong sustainable development and environmental management principles should also be demonstrated. The consideration of landscape character will be paramount in all development proposals in order to protect and conserve locally distinctive qualities and sense of place and to maximise opportunities for restoring, strengthening and enhancing distinctive landscape features'.

The proposed development does not conform to these principles. It detracts from the local character of the area, harms biodiversity and does not mitigate climate change.

Policy E4 and DC 1 of the local plan states:

'All development shall be of an appropriate quality, scale and character compatible with the local area, protect the residential amenity of the area, enhance the heritage, landscape and biodiversity of the area and shall not harm interests of acknowledged importance.'

We believe that the design has no architectural merit and is certainly not in scale or character with the local area.

Since 2009 there has been a huge increase in the provision of tourist accommodation in the Alton area and **it is considered to be sufficient up to 2033.**

There are over 100 similar units within a 4 mile radius. The existing small lodge developments are often in secluded fields and woodland settings away from neighbouring properties not squashed up against a hedge in a garden. In addition to this Alton towers have almost 800 units and can accommodate around 2,500 people over 5 sites. **There is no need for any further low quality accommodation of this type.**

SS1 states that the development must maintain the locally distinctive character of the Staffordshire Moorlands. This project detracts from the local character of the Alton area of Staffordshire and its setting. **The development will not 'protect and enhance the natural and historic environment'.**

Policy DC 1, states that *'new developments should be of a high-quality and add value to the local area incorporating creativity detailing and materials appropriate to the area'*.

Paragraph 5. states that the design should *'protect the amenity of the area, including creation of healthy active environments and residential amenity, in terms of satisfactory daylight, visual impact, sunlight, outlook, privacy, soft landscaping as well as noise, odour and light pollution'*.

Policy DC 1 - Design Considerations, states 'The development shall be well designed and reinforce local distinctiveness by positively contributing to and complementing the special character and heritage of the area in line with the Council's Design Guide'.

The proposed lodges do not meet these, or the following requirements.

1. be of a high quality and add value to the local area, incorporating creativity, detailing and materials appropriate to the character of the area; They do not do this.
2. be designed to respect the site and its surroundings and promote a positive sense of place and identity through its scale, height, density, layout, siting, landscaping, character and appearance; This has not been done.
4. Incorporate sustainable construction techniques and design concepts for buildings and their layouts to reduce the impact of the development; This has not been done.
6. promote the maintenance, enhancement, restoration and re-creation of biodiversity and geological heritage, where appropriate; This has not been done.
7. Provide for safe and satisfactory access... This has not been done.
8. require new developments to be well integrated for car, pedestrian and cycle use as well as other sustainable transport links; This has not been done.
9. ensure that existing drainage, waste water and sewerage infrastructure capacity is available, and where necessary enhanced, to enable the development to proceed; This has not been done.

For all these reasons I am against the appeal proposal. The refusal decision made by SMDC is correct should be upheld.