

Formal Objection to Planning Application SMD/2025/0380

Land adjacent to High View, Sutherland Road, Longsdon, Staffordshire ST9 9QD

Submitted by: Mrs Georgina Holden

Address: High View, Sutherland Rd, Longsdon, ST9 9QD

Date: 15th September 2025

1. Development on Green Belt and Agricultural Land

The site lies within the North Staffordshire Green Belt and is designated agricultural land, not domestic or garden land. The retrospective access approval granted for the site was limited to agricultural use only, and the land has no prior history of residential use.

- The proposed development fails to meet any of the exceptions set out in Paragraph 154(e) of the National Planning Policy Framework (NPPF), which only permits “limited infilling in villages” in exceptional cases.
 - Longsdon has no defined settlement boundary. The site lies beyond the main village cluster and is not enclosed by continuous built form on both sides, a necessary condition to qualify as infill.
 - This proposal contradicts Policy SS10 of the Staffordshire Moorlands Local Plan, which strictly limits inappropriate Green Belt development unless exceptional circumstances are proven—which they are not in this case.
 - Approving this would create a dangerous precedent for development creep in rural Green Belt zones.
 - This land had been rented to Mr and Mrs Holden as an allotment for a number of years, clearly defining that it is for agricultural use.
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2. Highway and Pedestrian Safety Risks

The proposed access from Sutherland Road presents significant risks for all highway users:

- Proximity to A53 Junction: The site lies close to the junction of Sutherland Road and the A53, a busy arterial route. Additional traffic will contribute to congestion and increase turning movements onto an already dangerous stretch. There have already been a number of accidents on this junction and within a few yards.
- Visibility at the site entrance is restricted due to hedgerows, topography, and a curve in the road. While the area is zoned 30mph, cyclists frequently travel faster and are less visible and audible, increasing collision risk.

- It is impossible to make a clear right turn from the access point of this land as this is in direct line of traffic of cars, vans and cyclists. Pedestrians also use this side (opposite Limes Avenue) to walk on due to parked cars tending to be on the side of Limes Avenue junction due to the houses on that side of Sutherland Road having no driveways to park. This right turn would be in direct line of traffic travelling down Sutherland Road (away from the A53). Traffic does not keep to 30mph, cyclist travel much faster and both have no awareness of cars pulling out of drives.
- Cars travelling up Sutherland Road (toward A53) are also forced onto the side of the road where access is required, due to parked cars opposite the access. Again, this is making safe access very difficult.
- Pedestrian Safety is compromised as there are no pavements. Residents, dog walkers, and children must walk on the carriageway, putting them in direct conflict with vehicles entering or exiting the proposed development.
- The access was retrospectively approved solely for agricultural use. It is not suitable for HGVs, and the narrow width, turning constraints, and poor surface make it inappropriate for the construction traffic and emergency services access required for residential development.
- HGVs for delivery during construction would not be able to access the site due to cars opposite the entrance to the site. The turning area to access is not sufficient and this is certain impossible without breaching the boundary of the access with High View. This is likely to damage the drive surface.
- It would be impossible to use a crane to delivery as this would also risk damaging overhead telephone cables providing access to communications and entertainment.

This is in breach of Policy T1 (Development and Sustainable Transport), which demands safe, appropriate, and inclusive access.

3. Environmental and Ecological Harm

The development site plays a vital role in the local ecosystem:

- It borders protected woodland with Tree Preservation Orders, and is part of a rural wildlife corridor linked to Hollinay Woods.
- The applicant's own Ecological Appraisal confirms the presence of foraging bats, nesting birds, and other protected species.
- The proposed development would cause fragmentation of this habitat, reduce ecological connectivity, and introduce light and noise pollution.

- There are sets close by in the woodlands and regularly we see hedgehogs, snakes, woodpeckers and deer on the ground. It is a natural corridor for lots of wildlife.

This contravenes:

- Paragraphs 179–182 of the NPPF, requiring biodiversity protection and net gain
- Policy NE1 (Biodiversity and Geological Resources) of the Local Plan

4. Drainage and Foul Sewerage Inadequacies

The drainage plan is flawed, and the site cannot meet the technical requirements for a safe and compliant foul water system:

- **No Mains Sewer:** The village lacks mains sewerage, and the proposal relies on a package treatment plant.
- **Plot Size:** The site is not large enough to meet the legal separation distances required between the treatment plant, habitable buildings, and plot boundaries as set out by the Building Regulations (Part H) and Environment Agency guidelines.
- **Clay Soil Conditions:** The land is impermeable clay, meaning soakaways cannot function, and treated water cannot safely disperse. This creates a high risk of pooling, surface water contamination, and foul water overflow.
- **Gradient:** The site sits on a steep slope, increasing the likelihood of runoff onto neighbouring land and Sutherland Road—posing environmental and public health risks.
- **Existing Infrastructure at Capacity:** Residents have previously been advised that Longsdon's drainage infrastructure is full. Any further load risks failure and pollution.
- The proposal is in clear conflict with Policy SD5 of the Staffordshire Moorlands Local Plan and fails to meet Part H of the Building Regulations regarding sanitation and drainage infrastructure. It also raises potential non-compliance with The Environmental Permitting (England and Wales) Regulations 2016, which govern the discharge of effluent from non-mains systems.

This breaches:

- Policy SD5 (Flood Risk)
- The Environmental Permitting (England and Wales) Regulations 2016

5. Visual Harm and Erosion of Rural Character

This proposal introduces an incongruous suburban form to an otherwise rural and agricultural landscape:

- The site lies beyond the core of the village and disrupts the visual continuity of open fields and woodland.
- It contributes to ribbon development along Sutherland Road, reducing the openness of the Green Belt.
- It undermines Policy DC3 (Landscape and Settlement Setting), which protects against inappropriate landscape intrusion.

The development offers no enhancement to the existing settlement and will irreversibly alter the area's rural character.

6. Privacy and Amenity Concerns

- **Overlooking:** The proposed dwelling would face into the rear of existing neighbouring properties, particularly High View and properties on Limes Avenue. This will result in significant loss of privacy.
- **Noise and Light Pollution:** Construction and eventual occupancy would increase noise and artificial light in a previously quiet, dark area, contrary to Policy DC1 (Design Considerations) of the Local Plan.

7. Procedural and Precedent Concerns

- **Previous Refusal:** An earlier application for this site (SMD/2017/0694) was refused and dismissed at appeal. The Inspector ruled that the site was not infill and that development would harm the Green Belt.
- **Misuse of Agricultural Access Approval:** The only reason access exists is due to a retrospective grant for agricultural purposes. It is inappropriate and misleading to now repurpose that access for residential use.
- **Irrelevant Appeal Comparisons:** Reference to appeal APP/B3438/W/24/3354279 is not valid. That application was for development within an existing residential garden, unlike this case which involves undeveloped agricultural land.

Conclusion

Planning Application SMD/2025/0380 must be refused. It is:

- In clear breach of national and local Green Belt policy

- Setting a precedent for other plots of land on Sutherland Road to be used for housing development.
- Unsafe for road users and pedestrians
- Environmentally and ecologically damaging
- Non-compliant with drainage and sewerage regulations
- Visually intrusive and contrary to rural character
- Procedurally unsound and inconsistent with prior decisions

For these reasons, I respectfully urge Staffordshire Moorlands District Council to reject this application in full.