Julie Mitchell
Planning Services
Wiltshire Council

By email only

22 August 2023

Dear Julie,

Application Reference PL/2023/06402 – Subdivision of the residential plot and the erection of a dwelling to the southwest of '150 Bouverie Avenue South', together with hard and soft landscaping and associated works.

This document is submitted following examination of the above referenced application, detailing objections raised to the scheme as proposed and the numerous factual inaccuracies within the planning statement.

Please note that the comments objecting to the original application for subdivision (PL/2021/05643) were made by the former owner occupant of 161 BAS; the current owner occupants were unaware of the full impact of the proposal at that time.

Primary objection

The Planning Statement claims at Para 4.15: "The scale, design and massing of the proposal are very similar to those considered acceptable within the outline application (PL/2021/05643)."

The submitted and approved outline plans and elevations dated 28 Sep 21 show a two storey, four-bedroom, three-bathroom house. At the time, numerous neighbours and Salisbury City Council objected to these due to overdevelopment. The recent submission dated 31 Jul 23 shows a five-bedroom, six-bathroom house. The primary objection is that this differs so vastly from the original outline submission that the planning application should be considered as a new application and refused in its entirety.

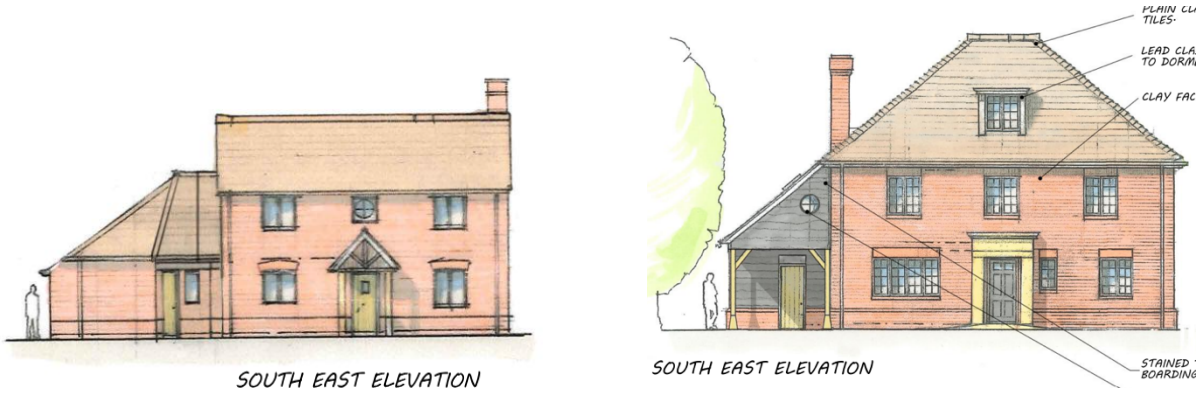


Figure 1 – side by side comparison of proposed elevations PL/2021/05643 (left) and PL/2023/06402 (right)

The planning statement claims at para 4.36: “Socially, the proposal would contribute to the much-needed supply of housing in the area. Indeed, Paragraph 68 of the NPPF highlights that “small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly”. The applicant has sought the most efficient use of the land which will contribute to the identified shortfall in land for housing, in line with Paragraph 117 of the NPPF.”

However, within the same section of the NPPF, it follows at paragraph 72 that “Local planning authorities should support the development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home)”. Therefore, it is logical to say that the need for small and medium sized sites is to help provide entry level homes adjacent to existing settlements, as also discussed within paragraph 72. This proposed development cannot be classified as suitable for first time buyers as it is a very large family or executive home in a premium area of Salisbury. Thus, the suggested benefits of this development are fundamentally flawed providing further weight behind a refusal of permission.

<u>Points of concern</u>

In the submitted planning statement, para 2.1 details the planning history of application S/1998/1270 dated August 1998. Figure 1 shows that work remains incomplete and no garage access is feasible due to a large vertical step remaining from the driveway to its entrance; this makes it non-functional for its primary design use. The points of concern are:

1. If any further approved works are similarly incomplete, this will add further detriment to the street scene.

2. Subdivision of the plot, as proposed, would result in two large houses on smaller than average plots for the location. 150 Bouverie Avenue South (BAS) has a smaller than average driveway than other properties along its side of the road; the driveway is steep and short (figure 3). Subdivision of the plot would take away land for any future owners to use as driveway space, particularly if future owners require garage access which would further reduce the available external parking.



Figure 2 – photograph of 150 BAS garage dated 10 Aug 23



Figure 3 – photograph of 150 BAS garage dated 10 Aug 23

Out of character

Planning statement para 4.12 "150 Bouverie Avenue South comprises a larger than average garden. This is particularly when the existing garden is compared with the dwellings to the south, which are defined by short, thin gardens (as demonstrated above). The surrounding properties have long linear gardens, whereas the character of the site differs due to its position at the end of Bouverie Avenue South. Also, the plot is located between buildings that not only front Bouverie Avenue South but also front Coombe Road and those located off a private cul-de-sac off Old Blandford Road."

Whilst 150 BAS does presently benefit from a large garden, most of the properties on the northern side of the road have similar, if not larger, sized plots (Figure 4). The properties to the south of the road have, in the main, long plots with buildings taking up approximately <15-20% of the available space and properties typically enjoy gardens larger than their house size. This is not the case with the proposed property which would make it entirely out of character with the street.

Figure 8 within the planning statement uses photographs of other houses on Bouverie Avenue South for comparison. Two of these are smaller than the proposed house and both on larger plots. The other two are larger than the proposed house, however, occupy significantly larger plots with easy highway access and large driveways. There are examples of plots that appear to sit within other plots whether due to subdivision or other reason; the properties that occupy those plots are typically 3-bedroom houses or bungalows. Photographic evidence of these has not been included to protect owners' privacy.

The result of this development would be two large houses, 150 BAS and the proposed property, both being on plots comparatively much smaller in size than close neighbouring properties when considering how much of the plot is built on. We estimate that approximately 40% of 150 BAS' plot would be built upon or driveway and the subdivision would be even greater. This is significantly out of character with the remainder of the street and represents clear over-development to the detriment of the local area and amenity.



Figure 4 – Site context

Overbearing

The size and position of the proposed house should be considered particularly overbearing to neighbouring properties, in particular the three properties to the south: 161 BAS; The Orchard, Coombe Road; and, 242 Coombe Road.

Figure 5 shows that the proposed plot currently sits along the 100 m contour, whilst the properties to the south are along the 95 m contour. The topography of the land already elevates properties 5 m above those to the south and due consideration should be given to this as an aggravating factor in overbearing and the perception of loss of privacy; a property with a **maximum** of two storeys would minimise this.



Figure 5 – Ordnance Survey map 100 m decreasing 95 m contour lines

Overlooking and loss of privacy

To the north of 150 BAS and the proposed plot, houses are generally at the northern end of their plots with gardens extending toward the south. The opposite is generally true for close properties to the south of 150 BAS and the proposed plot with gardens stretching to the north. This places 150 BAS and the proposed plot centrally as the hub of approximately 7 gardens in which residents should expect continuing privacy. All of these plots will be overlooked by the proposed property and is exacerbated by its domineering 3 storey design. The huge number of mature trees being destroyed will leave many neighbours feeling exposed and with the perception of overlooking; a reduction in the size and height of house would minimise this.

Planning Statement "Para 4.22 The proposal would therefore not cause any undue overlooking or loss of outlook and the proposed dwelling has been designed so that there are no first-floor windows

on the side elevations of the property to ensure that there would not be a loss of privacy for either property."

This statement is in contrast to the submitted proposed elevations which show a first-floor window directly overlooking the 150 BAS plot. Whilst this is the developer own property, the Planning Authority should consider future owners so this window should be removed to prevent overlooking.

Figure 6 shows the current view towards the proposed development from the garden of 161 BAS and across the adjoining garden of The Orchard, Coombe Road. The trees to the top left will be decimated and replaced with a 3-storey edifice which will be grossly overbearing.



Figure 6 – View of the propose development site taken from within 161 BAS and across the adjoining garden of The Orchard, Coombe Road

Shading/ loss of daylight

150 BAS, as with all other properties accessed along the private leg of the road benefit from a southern aspect; all properties currently enjoy a south facing garden and the associated light benefits. The proposed property will result in a small shaded garden and shading/ loss of daylight to the current property at 150 BAS which will impact future owners. A vast reduction in mass would reduce this impact. The impact of the development may also reduce light into many of 150 BAS rooms, the planning authority should consider the requirement for a daylight survey for 150 BAS.

Over development

As per the wealth of objections to PL/2021/05643, including Salisbury City Council, an addition of a property at the end of a narrow cul-de-sac adds to the claustrophobic feeling of properties at this end and constitutes over development; a property as large as the one proposed is unnecessary. The scale of the property should be significantly reduced to prevent over development.

Highway safety

Planning Statement "Para 4.29 When commenting on application PL/2021/05643, the Highways Officer stated that gates should not be provided as there is not space to allow vehicles to wait off the highway for them to open. However, since the application site is located at the end of Bouverie Avenue South and the area directly in front of the proposed gates is a designated turning area, there would very limited opportunity for conflict with other road users. As such, it is considered that the proposal, including gates, will not impact highway safety."

The end of the road is not designated turning area. It forms part of 161 BAS (see figure 8) over which 150 BAS have a right of access only. All other houses on this stretch of BAS have driveways perpendicular to the private road, this allows turning into or out of their driveways.

The end of the road is not wide enough to turn; any delivery vehicles have to reverse the entire length of the road to exit or, the safer option, is to use ungated private driveways to turn. An additional house will only add to the burden of delivery vehicles to the unadopted road.

Whilst on paper, the driveway may appear to have enough space for the requisite number of parking spaces and manoeuvrability, in reality it will be particularly tight and difficult. It is recommended that as per the Decision Notice dated 30 Sep 21, the driveway remains ungated for highway safety.

Partially to account for potential development at 150 BAS, we have gained approval (PL/2023/03531) to move our garage to the north west corner of our garden which will enable us to create more usable parking within our curtilage. In response to an objection made by Atlas Planning and 150 BAS, the outer hedge to the north of the garage must remain as a condition of the planning. This hedging is shown in in Figure 7 as the hedge outside the proposed development boundary to the south. The planning statement also indicates that this hedging will form part of their entranceway, with a stub extending northwards at the southern part of the entranceway, but any hedging for this purpose must be within their boundary and not outside as depicted in Figure 7.

The submitted proposed site plan shows the proposed highway access in a central position at the end of the roadway. This could cause potential safety issues with the proximity to our driveway at 161 BAS, particularly with the view obscured by hedging. By putting the entrance in the centre of the road will result in a **detrimental impact to highway safety** as cars accessing 161 BAS may interact with those accessing the proposed new driveway. The proximity of the entrance driveways coupled with a limited sight line is nothing short of dangerous. The recommendation is to bias the entrance driveway as far to the north as possible to reduce the significant safety impact.

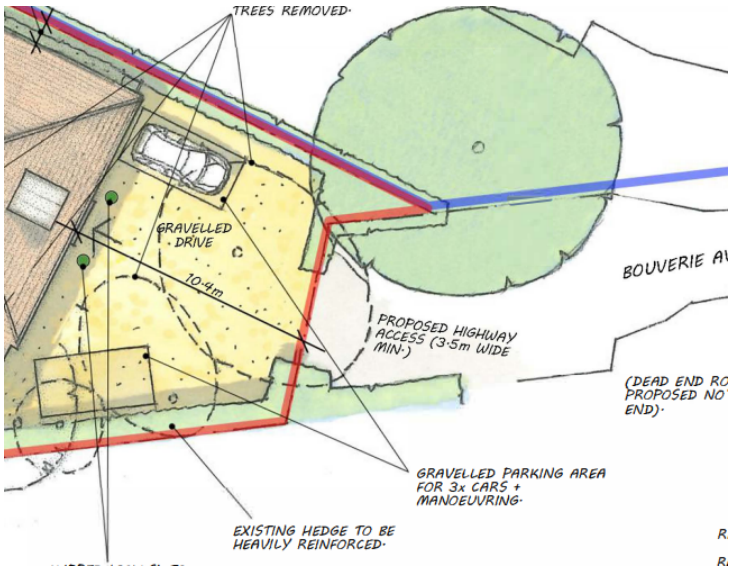


Figure 7 – Annotated proposed site plan

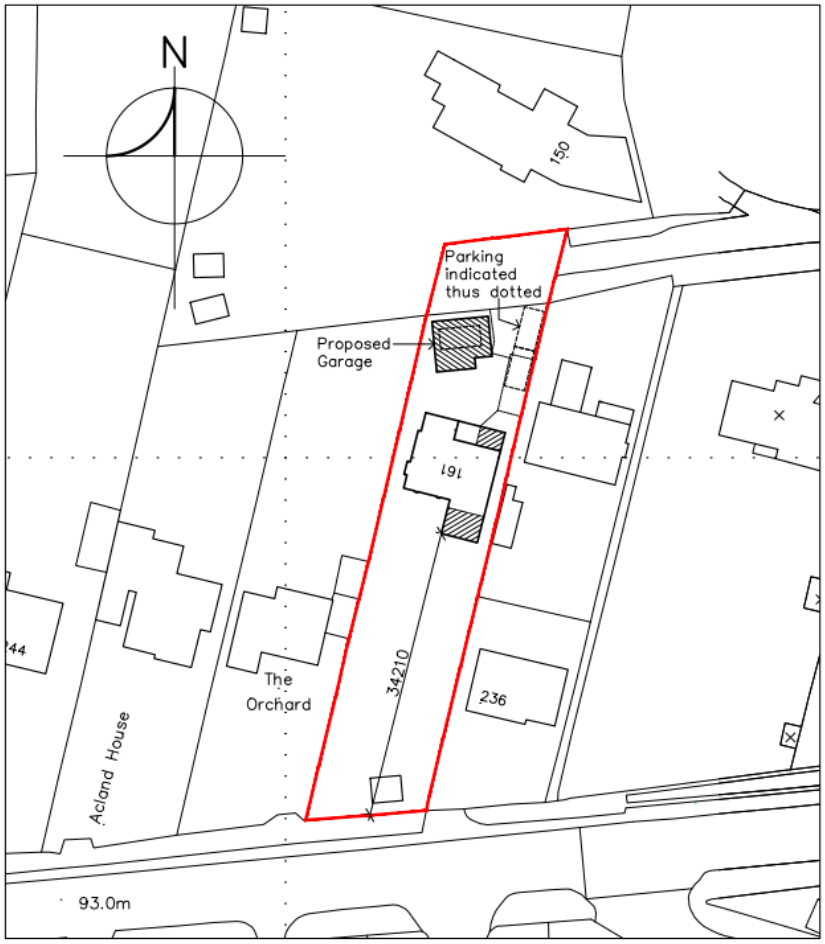


Figure 8 – Approved site plan PL/2023/03531

The development itself will provide a significant danger and nuisance. Several properties, including our own, have young children in residence and the necessary building contractor's vehicles and deliveries have the potential to cause significant hazards. To minimise the real danger and nuisance effect in blocking the end of the cul-de-sac, it is recommended that as a condition of planning that the authority directs that the developer must ensure that all vehicles relating to the development are parked within site, their own property or on public roads. As stated previously, 150 BAS have a right of access across the end of the road owned by us but this does not include a right to park.

Environmental Impact

"Para 4.17 The provision of new and reinforced hedgerow planting and the retention of trees will also ensure that the seemingly spacious character and the appearance of the site are preserved."

In reality, this statement is focussing on a subjective appearance and glossing over the vast amount of mature trees that will be destroyed and the impact this has on the environment, carbon footprint and the number of birds, wildlife and potentially bats that habit in the local area. A significant reduction in scale of property is the only way to minimise this.

With an environmental and sustainable mindset; the plan is particularly short sighted. The large amount of south facing roof space has been filled with a number of rooflights; this will

prevent/restrict any future owners from using this space for solar panels. Removal of these rooflights is recommended.

Summary

This objection shows how the proposal is **out of character, overbearing, overlooking, results in loss of privacy, signifies over development and presents a detrimental impact to both the environment and highway safety**.

The number of local objections to this application and its outline predecessor, including from Salisbury City Council, clearly demonstrate the strength of negative feeling towards this proposal. The planning authority should carefully consider this in determining this application and as the scale of this development is so out of scope with the plans submitted for outline approval, we suggest that this is viewed as an initial application.

For these reasons the application should be **refused**, and the applicant should consider a more respectful and neighbourly form of development.

Yours sincerely

Emma and Pete Coughlin

161 Bouverie Avenue South