

34 Grand Avenue  
Pakefield  
Lowestoft  
NR337AR

Matthew Gee  
Planning & Development Management  
East Suffolk Council  
Riverside  
4 Canning Road  
Lowestoft  
NR33 0EQ

30/06/2020

Dear Mr Gee

**PROPOSED DEVELOPMENT AT 34 GRAND AVENUE, LOWESTOFT APPLICATION REFERENCE:  
DC/20/2094/FUL**

We refer to the current application at the above-mentioned property for the construction of a single storey annex. As the immediate neighbours to the application site, we are writing to submit our strong objections to the proposed development and have outlined our concerns below.

From the outset, the description of the proposal as an 'annex' is misleading and inaccurate given that this seeks to develop a self-contained residential unit which is completely separate to the main house and located at the rear of the garden. In addition, the application should not have been validated on the basis that the submitted material is deficient in providing all the correct information that is required to determine the application. There are no dimensions on the proposed elevations, with particular reference to the height of the building, and the drawings do not provide any contextual assessment of the relationship of the proposal with the immediate neighbours on either side. For the reasons set out below and in following the correct procedures, the application is not considered suitable at this stage for the correct assessment by officers.

In terms of the proposed development itself, policy DM6 of the Suffolk Coastal District Local Plan Core Strategy & Development Management Policies (July 2013) refers to residential annexes and states that the creation of self-contained annexes to existing dwellings in order to accommodate will be permitted in the following circumstances:

- (a) in the form of an extension, where the extension is capable of being incorporated into the existing dwelling when no longer required; or*
- (b) in the form of the conversion of an outbuilding or construction of a new building within the curtilage where it is well-related to the existing dwelling.*

*In both circumstances:*

- (i) there must not be any significant adverse effect on residential or visual amenity;*
- (ii) in the Countryside there must not be a material impact on the landscape; and*
- (iii) conditions will be applied to limit occupation to prevent future use as a separate dwelling.*

It is very clear that the proposed development fails to meet either of the criteria under the first part of the policy given that this is not an extension or capable of being an extension of the main dwelling, nor is a conversion of an existing outbuilding. Whilst it is a new building under part (b), it is not well related to the main building as a result of its scale, height and position (as expanded upon below).

Furthermore, whilst an assessment against part (i) is not possible given the omission of clear dimensions of height on the submitted drawings, a building that effectively infills the full width of the garden, runs 10m along the length of our boundary and within 1.2m of our boundary fence will clearly have a detrimental impact on residential amenity in respect to outlook, privacy, overlooking and disturbance. The proposal therefore fails to meet the objective of Policy DM6.

Policy WLP8.10 of the Waveney Local Plan (2019) refers to residential annexes and states that they will be permitted where –

- i. The annex forms an extension to the existing dwelling.*
- ii. Only where a physically attached annex is not feasible will consideration be given to the conversion of a suitable existing detached outbuilding within the curtilage, and only where this is not feasible will consideration be given to new build detached residential ancillary accommodation which is closely related to the existing dwelling.*
- iii. Residential annexes must be designed to reflect the character and setting of the original dwelling. The size, scale, design, location and provision of accommodation in the annex must be subordinate to the existing dwelling.*

The proposal clearly fails part (i). There has been no consideration of an authentic extension ‘annex’ to the main building under part (ii) and given that many of the neighbouring properties have extended at the rear, there seems no reason why this should not have been considered. There are no existing buildings that can be converted. This would then lead to a failure against part (ii) of the policy given that the proposed structure does not ‘closely relate’ to the main building. The proposal therefore fails to meet the requirements of Policy WLP8.10.

In addition, the supporting text to Policy WLP8.10 requires applications to demonstrate how the annex has been designed to prevent the creation of an independent dwelling including the future use of the unit. Whilst the Council could impose conditions on the use of the building, it is very clear that this is a self-contained dwelling and our concern is that unless this is very closely controlled, there is every possibility that this could result in it being used for temporary/holiday accommodation.

Policy DM23 refers to the protection of residential amenity and sets out the criteria under which all applications must be determined which include (a) privacy/overlooking; (b) outlook; (c) access to daylight and sunlight; (d) noise and disturbance; (e) the resulting physical relationship with other properties; (f) light spillage, air quality and other forms of pollution; and (g) safety and security.

The policy also states that development will be acceptable where it would not cause an unacceptable loss of amenity to adjoining or future occupiers of the development.

It is unclear from the submission drawings as to why the proposed extension has been designed and positioned in that way that it has as the orientation of the building results in the longest flank elevation running for 10m along our boundary fence. Again, whilst the height of the extension has been omitted, it would be assumed that it would be at least 2m with the fascia boards and roof build up. This will

clearly be visible from every part of our garden as well as from the rear of our property at ground and upper floors.

In addition, the recently submitted drawings indicate that the proposed entrance to the building will be from the long elevation that faces our property which is the narrowest part of the site. There seems to be no rational explanation for this given that the L-shaped structure creates a much more obvious position for the entrance on the other side. If we are to envisage the regular use of the property, then the position of the entrance door in the location shown against our property boundary will only exacerbate issues regarding noise and disturbance.

The significant mass of the building, its excessive length and height will result in a dominant and overbearing structure that will materially affect the outlook, privacy, daylight and sunlight and quiet enjoyment of our property and therefore fails to meet the policy objectives set out in DM23.

SPG 16 "House Alterations and Extensions" taken as part of the Suffolk Coastal Local Plan states that the impacts of alterations/extensions, particularly rear extensions, upon neighbours is a material planning consideration which the Council will have regard to when determining householder applications. In this context applicants should submit details of the relationship of a proposed extension/alteration to adjoining/surrounding properties. The key issues the Council will consider when assessing householder applications will be impact of any proposals upon privacy, sunlight, daylight and outlook (Para 5.1).

The submission has provided no detail in respect to the relationship of the proposed development with its neighbours and has omitted critical details such as the proposed height. Officers must ensure that accurate material has been provided in order to make a clear assessment of the proposed development and at this point as set out above, our conclusion is that the application will have a detrimental impact on our amenity.

We are very concerned about the potential impact that this proposal will have, and our objection demonstrates that the various policy tests have not been met by this application such that it can or should be supported by the Council. We would be very happy to arrange a site visit with you so that you can fully understand the harm and impact that this proposed development would have.

I look forward to hearing from you.

Yours sincerely

**Mr & Mrs A Cowley**