Amber Valley Borough Council Planning Officer Rebecca Godson
Town Hall, Ripley
Derbyshire, DE5 3BT
Email: development@ambervalley.gov.uk
Date: 24 October 2026

Planning Application Reference: AVA/2026/0676
Site Address: Arches adjacent to Tudor Lodge, Lodge Drive, Belper, DE56 2TP
Proposal: Conversion to ancillary sleeping accommodation
[redacted]

Dear Ms Godson,

I am writing [redacted] to formally OBJECT to planning application AVA/2026/0676. The proposed conversion sits in a quiet, secluded dead-end enclave where introducing a fully glazed commercial holiday unit will cause severe, irreversible material harm.

I respectfully request that the Local Planning Authority refuse planning permission based on the following numerous material planning considerations:

1. Unlawful and Misleading Baseline: [redacted] Unauthorised Commercial Use
2. Misleading Application Title
3. Severe Inaccuracies & Overlooking of Habitable Rooms (Policy EN15) and Private Garden - all measurements significantly below 21 metres
4. Devastating Loss of Privacy and Amenity [redacted]
5. Conflict of Uses & Vehicle Maneuvering Outside Proposed Glazed Area
6. Inaccurate Ownership Certificate A & Reliance on Land Outside the Applicant's Control
7. Total Loss of Quiet Residential Amenity in a Dead-End Enclave and Unfair Amenity Transfer (Policy EN15)
8. Direct Violation of Original Planning Condition (Ref: BER. 1164/13) & Highway Safety
9. Unfeasible Proposed Parking Space(s) (Drawing (08) 01 Rev C)
10. Substandard Highway Access Geometry, "Unfamiliar Driver" Hazards, Reversing Hazards on Shared Pedestrian/Vehicular Route & Substandard Network (Policy IN1)
11. Emergency Fire Appliance Access Failure & Fire Safety Hazards
12. Flawed and Misleading Reliance on LDC (AVA/2026/0061) & Stripped "Seating/Habitable" Status
13. Lack of Essential Infrastructure & Foul Drainage Risk
14. Harm to Non-Designated Heritage Asset, Class C Tanking & Unreported Artifacts (Policies EN4, EN5)
15. Unassessed Ecological Impact & Active Protected Bat Roosts
16. Substandard Internal Living Environment & Overheating (Policies EN1, EN15)
17. Structural Risk to Historic Arches & Lack of Engineering Assessment
18. Economic Test
19. Driveway Maintenance
20. Highways concerns - Lodge Drive and Belper Lane

21. Creeping Commercialisation of Historic and Constrained Site
22. Undeclared Internal Works, Blocking off Right of Way, Failure to Adhere to Party Wall Act.
23. Conclusions

Appendix 1: Corrected Window-to-window measurements and relevant photos
Appendix 2: Conflict of Uses & Vehicle Maneuvering Directly Outside and Alongside Proposed Glazed Area
Appendix 3: Diagram of [redacted] Land Ownership and shared access around and abutting the Proposed Garage Conversion.
Appendix 4: Original Planning Condition (Ref: BER. 1164/13)
Appendix 5: Illustration of Driveway Access issues in relation to positioning of Proposed Annexe
Appendix 6: Typical parking at bottom of Lodge Drive and on Belper Lane

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1. Unlawful and Misleading Baseline: [redacted] Unauthorised Commercial Use

Section 3.1 of the submitted Planning Statement asserts that operating Tudor Lodge as a commercial holiday let is "*acceptable under Use Class C3*" and uses this claimed ongoing business to justify providing an additional bedroom studio. However, no planning permission exists for this baseline material change of use for the main Tudor Lodge house at all:

1. **Recent listing of Tudor Lodge house on Sykes:** The house went “live” on Sykes Cottages only on 25 September 2026.
2. [redacted]
3. **Contradictory Marketing Claims**: Section 3.1 also claims the site is let only to "*single family groups of less than 6 people*". However, active commercial listings on Sykes Holiday Cottages (Ref: 1207831) and Booking.com market the property as "*suited to two couples or a small family and friends*" with parking for up to 5 cars alongside permitting 3 dogs. In addition this application to convert the garage arch to an additional sleeping space with an additional 2 car parking spaces alongside the arched outbuilding, thus increasing car parking up to 7 cars. 7 cars and 3 dogs is absolutely not consistent with one family group of 6 people.
4. **Compounding Harm:** The unauthorised “baseline” commercial holiday let operation of Tudor Lodge itself (advertised on Sykes Cottages for up to 5 cars), if not stopped [redacted] will inevitably create severe traffic congestion, pedestrian/ vehicle conflict on shared spaces, fire safety risks, and noise disturbance in this tranquil residential neighbourhood. Granting permission for this proposed garage conversion to further expand on the unauthorised holiday let use of Tudor Lodge itself directly compounds an ongoing planning breach [redacted]

2. Misleading application title

- The title says “Arches Adjacent To Tudor Lodge Lodge Drive Belper Derbyshire - Conversion to ancillary accommodation”. I want to be clear about this that this arched structure is much closer [redacted] than the Tudor Lodge dwelling:
  - It has [redacted] property to the left and right and partially in front of it
  - It is approximately 8 metres from the main [redacted] property plot, [redacted]
  - It is about 50 metres in distance to the nearest door of Tudor Lodge.
- It is quite astounding how the Applicant and his agent Planning Design have worked hard to be deceptive in this application. They have buried the “done deal” use of Tudor Lodge as an (unapproved) holiday let within the Planning Statement and have deliberately kept any reference to “Holiday Let” far away from the title of the application.

3. Severe Inaccuracies & Overlooking of Habitable Rooms (Policy EN15) and private garden - all measurements significantly below 21 metres

- **Manipulated Context Plan (Drawing 08 Rev B):** The applicant's context drawing places the red anchor dot inbound and past the exterior glass line [redacted] to falsely claim a separation distance of 16.016m.
- **True On-Site Edge-to-Edge Distance:** I have physically measured the true distances using a laser:
  - Edge-to-edge glass clearance [redacted] is <14.6 metres—well below standard UK separation guidelines (typically 21m for facing principal rooms).
  - Centre-to-centre distance is 15.81m (not the 16 metres claimed).
  - I am puzzled as to why the applicant seems determined to claim 16 metres (falsely) when guidelines state opposing windows should have a minimum distance of 21 metres.
  - In addition to the 17.9m distance [redacted] <14.6m [redacted] the following measurements also apply to other viewpoints/access points:
    - Principal bathroom window (not obscured glass) - 18.8m
    - Dining area adjacent to kitchen - 19.5m
    - Stairs (there are several windows) - 17.1m
    - [redacted] front door - 15.0m
  - Please see **Appendix 1** for photos of laser measurement taken of these distances.

4. Devastating loss of Privacy and Amenity [redacted]

- A converted garage arch would have a huge negative affect [redacted] Given the extremely close distance and how it faces [redacted]
- The proposed full-height glass frontage sits directly adjacent to, overlaps, and faces [redacted]

- Paying holiday guests sitting inside the glazed unit will have an unhindered view [redacted] resulting in a total loss of privacy for our outdoor amenity space. In turn, [redacted] use [redacted] would entirely affect any privacy of residents within this proposed conversion.
- [redacted] the inevitable light pollution, noise and general disturbance.
- In turn any holiday guests in this “annexe” would also suffer from a “goldfish” bowl situation [redacted]

5. Conflict of Uses & Vehicle Maneuvering Outside Proposed Glazed Area

- **Shared-use driveway that runs directly up to the proposed frontage of the conversion:** [redacted] household holds an established, daily Right of Way over the driveway apron directly in front of the proposed conversion to access and park inside [redacted]
- **Lack of defensible space generating practical and safety conflicts:** There is no buffer zone between this busy driveway and the proposed “wall of glass”:
    - **Safety Hazard:** Holiday guests stepping out of the proposed unit's main entrance door would step directly into an active vehicular driveway used several times-daily by [redacted] cars, creating a clear physical risk.
    - [redacted] **& Severe Privacy Loss:** Maneuvering vehicles and headlights shining directly into a full-height glass studio at zero-distance create an unsustainable privacy conflict. Conversely, internal studio lighting and direct sightlines will severely compromise [redacted] privacy [redacted]
    - **Impairment of Access:** Inevitable domestic overspill (pedestrian foot traffic, outdoor sitting, temporary items left outside) on this narrow apron will physically obstruct and interfere with [redacted] lawful right of way.
    - **Appendix 2** Figure 2.1 contains a range of photos demonstrating how [redacted] vehicles use the driveway directly outside, and right up to the garage door of the proposed conversion.

6. Inaccurate Ownership Certificate A & Reliance on Land Outside the Applicant's Control

- **Careful boundary measurements against** [redacted] **original title deeds** versus the basic inaccurate illustration on the HM land registry title plans confirm that the proposed conversion is physically undeliverable as drawn because it relies on land owned exclusively [redacted]
    - **Drainpipe Alteration Trespass**: The submitted plans propose adjusting a rainwater downpipe/drainage connection. This structure is physically accessed only by stepping directly onto [redacted] private land [redacted] and over which Tudor Lodge has no access whatsoever.
    - **Wall of Glass Installation & Maintenance Trespass:** To the other side of the proposed frontage, the proposed floor-to-ceiling glass wall directly abuts [redacted] legal boundary [redacted] for approximately 1.5 metres. While glass units can theoretically be positioned from inside, external weatherproofing, perimeter sealing, flashing integration, and ongoing

maintenance cannot be completed without standing on, or scaffolding over, [redacted] private land. The Applicant has no lawful access to enter this land to install windows or to maintain them.

- **Procedural Invalidity (Inaccurate Certificate A):** The applicant signed Certificate A claiming sole ownership of all required land. Because the scheme relies on land outside their ownership for essential construction and drainage adjustments, Certificate A is legally false, rendering the application procedurally invalid.
- **Material Undeliverability:** Planning permission cannot be granted for a development that relies on third-party land outside the applicant's control to deliver its construction or ongoing maintenance. Access to [redacted] land for any of those purposes is permanently denied.

7. Total Loss of Quiet Residential Amenity in a Dead-End Enclave and Unfair Amenity Transfer (Policy EN15)

- **Devastating impact on [redacted] residential amenity with no effect at all on Tudor Lodge:**
  - The application site sits approximately 50 metres away from the main front door of Tudor Lodge, but sits directly opposite [redacted] at just 8 metres to [redacted] boundary line, adjacent to [redacted] arches in the arched outbuilding, and to the other side/frontage of the proposed development, [redacted] garden area. Introducing an independent commercial unit into a quiet cul-de-sac setting—generating late-night arrivals, outdoor gatherings, luggage noise, and transient turnover—[redacted] will entirely destroy the quiet residential enjoyment [redacted] whilst having no effect on Tudor Lodge at all. Siting an active unit where the applicant reaps commercial benefits while dumping all living impacts onto a neighbour violates Policy EN15.
  - **Figure 1.6** shows the view that would be observed from the glass frontage. [redacted] Tudor Lodge, to which this proposal is supposedly annexed, is not even within view. This represents a complete transfer of amenity and burden to Archways.
  - **Appendix 3** contains a diagram which depicts the distance to the Tudor Lodge doorway of this proposed conversion in comparison with the distances to the various points of [redacted] house, garaging, gardens and arches [redacted] This diagram also makes clear how the proposed conversion sits [redacted] and quite some distance from Tudor Lodge itself.
- **Highlighting the distance from Tudor Lodge Dwelling to the Garage Arch (proposed development site):** Under planning law, an "ancillary annexe" must remain functionally and operationally subservient to the host dwelling. Siting a self-contained studio 50 metres away across a large plot severs any meaningful daily functional link to Tudor Lodge, effectively creating an independent dwelling unit. The fact that the applicant has included 2 new car parking spaces confirms this severance. This would effectively create a separate planning unit which is in contradiction of the planning condition of a total of four residential properties on land belonging to Tudor Lodge, BEL.1164/13 dated 1965 (see Section 8 below) and which

at that stage already recognised the risks of pedestrian vehicle conflict on a site with constrained access.

- **Direct overlooking** [redacted] Quite unbelievably the proposed conversion proposal has a wall of glass directly overlooking [redacted]; in particular approximately 1.5m of overlap exists on the frontage of the proposed conversion [redacted] thus leaving it totally overlooked. This would have a direct impact [redacted] would be subjected to direct overlooking and intrusion from holiday guests behind this extensive wall of glass, and their travels to and from the proposed conversion to Tudor Lodge.

8. Direct Violation of Original Planning Condition (Ref: BEL. 1164/13) & Highway Safety

- **Removal of mandated garage accommodation and compromised limitations originally imposed for highway safety:** The historic planning consent governing these properties (BER. 1164/13 Condition 2) explicitly stipulates "*Garage accommodation shall be provided on the basis of one garage or garage space per residential unit.*" and "*In the interests of residential and visual amenity and highway safety" and "To ensure that proper standards as laid down by the Local Planning Authority in respect of private vehicle accommodation are provided.*" Converting this garage into living accommodation directly violates this controlling condition, permanently removing required vehicle accommodation
- **Creation of an Unauthorized Independent Dwelling (Breach of Density Limits):** The provision of an independent entrance, en-suite bathroom, what seems to be a kitchenette, and dedicated parking space creates a self-contained unit/separate residential dwelling, rather than genuine subordinate ancillary accommodation. Creating an independent 6th dwelling breaches the density limits set under the original 1965 planning consent (which strictly capped the site to 5 residential units for "*...residential and visual amenity and highway safety"*).
- See **Appendix 4** for a copy of this original planning condition.

9. Unfeasible Proposed Parking Space(s) (Drawing (08) 01 Rev C)

- **Unworkable proposed parking area**: The site plan proposes a single parking bay (although the planning statement proposes 2) within an area measuring only 7 metres in total depth/width across the driveway. This represents a fatal design flaw under Derbyshire County Council Highways Standing Technical Advice and Manual for Streets:
    - Mandatory 9.0m Dimensional Deficit: Derbyshire Highways standards require a minimum bay width of 3.0m when bounded by a wall (2.5m standard bay + 0.5m wall buffer) plus a clear 6.0m turning aisle directly behind it to allow safe turning, requiring a total site depth of 9.0 metres.
    - The available 7-metre space leaves an unresolvable 2.0-metre deficit.
    - [redacted] Right of Way must be maintained at 12ft width (3.7m) in width at all times as per binding property deeds.
    - Reversing or maneuvering out of this space is physically impossible without trespassing across [redacted] private land. The driver would have to reverse a total of 136m including around 2 blind 90 degree bends in order to egress the site.

Clearly this is entirely unacceptable from a vehicle and pedestrian risk on the shared use driveway.

10. Substandard Highway Access Geometry, "Unfamiliar Driver" Hazards, Reversing Hazards on Shared Pedestrian/Vehicular Route & Substandard Network (Policy IN1)

The commercial and unlawful short-let operation of Tudor Lodge and now the proposed bedroom expansion will cause an intense, dangerous turnover of vehicular traffic on a private single-track access driveway that fails national design mandates (NPPF and Manual for Streets):

- **Severe Pinch Points:** The access track narrows from 4.5m on Lodge Drive down to a 3.2m steep ramp bottleneck serving multiple households. The 3.2m width (wall to wall) ramp in fact serves 3 houses already [redacted] Adding this “bedroom annexe” with its own dedicated parking area effectively increases the dwellings to 4. The prospect of 4 houses sharing a tightly constrained wall-to-wall driveway is entirely impractical and unsafe and entirely contravenes guidelines within a plethora of building regulations and highways documents.
- **136 Metre Blind Reversing Trap:** There are zero passing places over a continuous 136m from the turning circle near the top of Lodge Drive to the proposed parking area for this garage annexe. Forcing oncoming holiday guests and couriers to execute a 136m blind reverse through severe pinch points (and the two 90 degree bends) violates Section 6.8.8 of Manual for Streets (12m max servicing reverse).
- **Zero Pedestrian Refuge:** Local residents and school children using the right of way through the 4.4m gate or along the 3.2m ramp are enclosed by solid stone retaining walls, leaving zero soft verges or step-off refuges when a vehicle approaches.
- **Unfamiliar Driver Risk**: As routinely established by the Planning Inspectorate commercial holiday traffic introduces a constant turnover of tourists unfamiliar with local hazards, blind spots, and reversing geometry, greatly increasing collision risks.
- **Appendix 5** contains an illustration of the access route and lack of safe turning points

11. Emergency Fire Appliance Access Failure & Fire Safety Hazards

The application contains zero technical assessment or calculations regarding emergency vehicle access or Approved Document B compliance, concealing a critical fire safety failure:

- **Fire Engine Access Distance and exceeding 45m Hose Reach limit:** The nearest feasible turning point for a fire appliance on the main Tudor Lodge drive is over 50 metres away, under the assumption this driveway is not full of the other (5) guest cars. A fire engine cannot physically negotiate the other route which consists of the narrow 3.2m ramp and two 90-degree bends. If measured from the top of the highway to the back of the proposed conversion the total distance is 161m.

12. Flawed and Misleading Reliance on LDC (AVA/2026/0061) & Stripped "Seating/Habitable" Status

- **Removal of “seating” or “recreational use” in council final LDC report:** The applicant relies on Lawful Development Certificate AVA/2026/0061. However, Section 5.15.3 of the Council’s official LDC report confirms that the applicant was forced to submit a Revised Planning Statement that stripped out all references to "seating" or "recreational" use. The LDC was granted exclusively for low-intensity "private garage,

log storage and utility use" as ancillary storage. The applicant is misusing a storage LDC to force through a full commercial living studio.

- **Garage, storage and utility use only:** The certificate was granted strictly and solely on the basis of passive, low-intensity incidental outbuilding uses (private garage, log storage, and utility storage).
- **Incidental storage, as documented in the CLEUD, is the lowest level of use associated with a dwelling:** Incidental storage generates zero noise, night-time light, or human foot traffic. Converting this outbuilding into an active primary living unit with full amenities (bed, en-suite, and kitchenette) represents an unacceptable material change in the intensity and character of use, re-introducing primary residential living space that was explicitly stripped out during the CLEUD determination.

13. Lack of Essential Infrastructure & Foul Drainage Risk

- The arches currently lack any foul drainage or mains electricity connections whatsoever. Prior electrical systems installed within the space are no longer functional.
- Trenching out for these services would amount to a complete and unacceptable blockage of access [redacted] and would materially obstruct [redacted] Right of Way for [redacted] and any emergency services [redacted] no alternative route by which to enter [redacted]
- The local sewer network in this elevated area is historically prone to blockages and surcharging due to a very shallow fall. Installing a new bathroom and kitchenette in a subterranean arch without an approved, viable foul drainage strategy poses severe contamination and drainage risks.
- If a sewer or new mains electricity line is to be dug this would have an unsafe affect [redacted] as it would inevitably block [redacted] access point to their home. Emergency services would be prevented from reaching [redacted] if the driveway is dug up!
- It is known that the drain currently installed in the garage enters a fresh water course which has been established (and enforcement action taken) by the Environment Agency in 2012. (Ref. no. 00965803) as a result of investigations into watercourse pollution. The cause was identified to be a washing machine which was discharging into the watercourse in the subject arch. The drainage within the arch remains the same as it was at that date - therefore there is NO suitable drainage within the arch to deal with the foul and grey water which would be generated by these proposals.
- Any disturbance to drainage in this area risks disruption to this water course and for foul water to again enter the freshwater stream [redacted] where is is used for watering sheep, and ultimately into the river Derwent in an untreated fashion
- It is observed from plans that excavation is required beneath the garage floor as a means of tanking and waterproofing the development. This is a direct threat to the known natural freshwater course in this area.

14. Harm to Non-Designated Heritage Asset, Class C Tanking & Unreported Artifacts (Policies EN4, EN5)

- **Obscuring 1792 Stone Interior**: The 1792 gritstone arches are recognized as a non-designated heritage asset. To render a subterranean stone arch habitable, an

active Class C tanking membrane system will be required, permanently covering and obscuring intact 1792 interior stone masonry and blocking the historic interconnecting doorway linking to our arch through which the applicant has a necessary right of way to access the roof for maintenance.

- **Previous form for Heritage Crime / NPPF Violations:** It is noted that in building the unauthorised and non-compliant wooden structure adjacent to Tudor Lodge that the ground excavations for that structure have damaged the remains of cellars [redacted] (the 1790s Library and Grand Staircase footprint) without archaeological recording, breaching NPPF Heritage Policies HE5, HE7, and HE10. Clear evidence of historic vaults and stonework were excavated bu then hastily covered with limestone and concreted over 0n 02/20/2026. In turn, it is fair to expect that the same lack of care will be taken in any works to this structure, as is evidenced to date with the destruction that took place by the applicant to the overall structure in July 2026 including cutting large apertures in the internal walls and roof, which remain unrepaired contrary to the advice of Structural Engineers: and the ongoing dumping of building materials by the applicant and his family that continues adjacent to the arches [redacted]

15. Unassessed Ecological Impact & Active Protected Bat Roosts

- The entire arched outbuildings are active habitats for protected bat species. [redacted] witnessed bats swooping around the entire structure [redacted] It cannot be said that there are no bats in the Tudor Lodge garage arch and as such, the applicant has failed to submit a Phase 1 Protected Species / Bat Survey. Converting the arch without ecological assessment breaches the Conservation of Habitats and Species Regulations 2017 and Wildlife and Countryside Act 1981. Furthermore there have been multiple DOCUMENTED sightings of [redacted] pheasants, woodpeckers, birds of prey and other wildlife throughout the site.

16. Substandard Internal Living Environment & Overheating (Policies EN1, EN15)

- **Ventilation concerns:** The proposed design relies on a single-aspect wall of glass as the main source of light (the old chimney is entirely unsuitable for use and is <u>not</u> an old coal chute - please speak to the Derwent Valley Mills team on this) and ventilation for a deep subterranean stone vault. This single-aspect glazed design creates severe overheating risks during summer months and lacks cross-ventilation.
- **Fumes from [redacted] vehicles entering the proposed garage conversion living space:** Again, as previously mentioned in section ***, [redacted] vehicles routinely manoeuvre directly alongside and outside the proposed conversion with no defensible space. The fumes from these vehicles will inevitably be drawn into the proposed conversion. [redacted] vehicle maintenance also often takes place in this open arch [redacted] with copious amounts of welding, angle grinding, engine maintenance etc. Again, the very close proximity of this proposed conversion to a clear garage storage/maintenance area confirms this space is <u>not suitable for human habitation</u>.

17. Structural Risk to Historic Arches & Lack of Engineering Assessment

- The 1792 gritstone arches are earth-sheltered structures supporting substantial soil loads. Installing active tanking systems, sub-floor drainage, and internal wall retrofits requires intrusive works. The applicant has failed to submit a Structural Engineer's

Report or Method Statement demonstrating that these works can be executed safely without compromising the structural integrity of this non-designated heritage asset or our adjoining arch structure.

- [redacted] I am in possession of a formal Structural Engineer's report carried out by a chartered structural engineer jointly with an engineer from the applicant's side. This report concludes that any excavation in the arches belonging to Tudor Lodge will create a risk of collapse to [redacted] the entire structure. Again, no safe method of construction has been proposed.
- The cross section diagram from the submitted document 1552750-PROPOSED SECTION confirms that excavation within the structure and up to the stone piers (walls between arches) is necessary - this represents a huge risk to the integrity of the structure, [redacted] and the hillside behind [redacted] thus necessitating confirmation that what is intended is actually feasible at all. We strongly suspect this extant 1792 structure has no foundations at all and is built upon bedrock exposed during the initial 18th Century levelling of the Bridge Hill House site.

18. Economic test

- The works required to ensure the long term stability of the building as a whole would require significant shoring, mass earth removal and the provision of a means of support for the many tons of earth supported by the building in its role in retaining the upslope properties, [redacted] and its outbuildings. It is understood from the aforementioned Structural engineers report that any removal of material such as that proposed in the Arch would jeopardise this structure and render it unsafe and prone to subsidence and collapse. The costs of providing this would easily run into the hundreds of thousands of pounds, and all for a scheme to create what is claimed to be a small 'incidental' living space. This is completely disproportionate and fails any sensible economic test with no realistic change of being financially viable.
- Furthermore to make this extremely damp space a viable living space, beyond the numerous issues listed above, a Type C tanking system would be necessary, with a suitable sump (more excavation). This would undoubtedly have a negative affect [redacted] and could cause even more deterioration to the structure beyond what has been caused already by the Applicant in making several holes in the roof and internal walls.

19. Driveway Maintenance Burden and Intensification of Use

- The access route by which large and disruptive construction vehicles, or holidaymakers vehicles, would approach the proposed conversion is over land which is not maintained by Tudor Lodge. Driveway maintenance on the former Bridge Hill Site now occupied by Tudor Lodge and others is apportioned by the number of properties it serves. As per the property deeds, an area in front of the Tudor Lodge gates serving five properties carries a ⅕ maintenance burden for each of those five properties. The steep ramp, [redacted] is maintained by those [redacted] properties, in the proportion of ⅓ each. The gravel driveway [redacted] is

maintained solely [redacted], as per [redacted] property deeds. As such, [redacted] does not consent to any intensification of use of this driveway, particularly by large and damaging construction vehicles which would increase the maintenance burden [redacted] as a result of actions taken unilaterally by Tudor Lodge, whether unlawfully as per the current Holiday Let or through the planning process for further intensification of use.

20. Highways Concerns - Lodge Drive and Belper Lane

- Beyond the driveway concerns discussed in Section 10 and Appendix 5 I also want to point out relevant concerns about the Highways access to Lodge Drive:
    - Lodge Drive itself is frequently difficult to navigate due to parked cars on both sides of the road
    - The bottom of Lodge Drive where it adjoins Belper Lane is suffering increased numbers of parked cars right up to the junction. Leaving Lodge Drive means driving on the wrong side of the road to turn onto Belper Lane.
    - The bottom of Belper Lane is usually constrained by parked cars - these parked cars even stretch up to the road directly opposite the Lodge Drive junction which makes the egressing Lodge Drive even more hazardous.
    - Vehicles exiting Lodge Drive have to approach the substandard junction with Belper land on the WRONG SIDE OF THE ROAD, then wait to pull out into traffic which is unseen due to the position of boundary walls on Belper Lane.
    - Exiting Lodge Drive then means turning onto the WRONG SIDE OF THE ROAD on Belper Lane due to the fact that vehicles are almost always parked on the left side of Belper Lane, which is dangerous by any measure, exacerbated by the substandard visibility splay when exiting Lodge Drive.
    - A further intensification of use of Lodge Drive by unfamiliar construction, delivery, maintenance, and holidaymaking traffic for up to 7 vehicles at a time as things stand (with a plan to further increase this) would add a completely inaccessible overburden to this junction cueing a severe risk of accident between vehicles and to pedestrians.
    - Many elderly persons walking dogs and going about daily lives are resident upon Lodge Drive as are many children of school age who regularly walk to the local schools in Belper and home again. Rushing delivery or maintenance vehicles pose an unacceptable risk to these pedestrians in a constrained street.
- **Appendix 6** contains photos of these typical parked cars on Lodge Drive and Belper Lane.

21. Creeping Commercialisation of Historic and Constrained Site

- As previously stated the site around Tudor Lodge is very historic with poor access due to historic narrow driveways being adapted for the limited permitted dwellings (5 in all as per 1965 planning condition) from the original Strutt's Bridgehill house when the site was developed post-war amongst the ruins of the demolished mansion.
- It is evident to I, that based on the (unapproved and imminent) use of the Tudor Lodge dwelling as a holiday let (https://www.sykescottages.co.uk/cottage/Derbyshire-Belper/Tudor-Lodge-1207831.h

tml), along with this extremely questionable “sleeping annexe” (clearly planned to be entirely independent from the “main” house) only represents the start of the applicant’s clear plans to develop the site even further. This is as evident in the diagram (bottom left) within document 1552750 - Proposed Section - where additional red markings (seemingly representing stairs) can be seen on the same diagram thus demonstrating the applicant’s further plans beyond this “ancillary annexe” which are as yet undeclared.
    - The planning officer should be aware of the final CLEUD report of AVA-2026-0061 dated 17/6/2026 where the use of the claimed “roof top seating area” was recognised to be false and was instructed to be removed.
- I am genuinely fearful of the Applicant’s insensitive and relentless plans to commercialise a historic site with known highways constraints, by any means possible. I hope the Planning Officer can recognise what is happening here and can [redacted] refuse this specific Annexe application and ultimately that Amber Valley can mandate that the whole site returns back to its original residential use which has been in place since Tudor Lodge’s construction in 1952.

22. Undeclared Internal Works, Blocking off Right of Way, Failure to Adhere to Party Wall Act.

The applicant’s plans misleadingly represent the Party Wall (for it is legally that) between his own Arch and the adjacent Arch [redacted] as a continuous, uninterrupted thick wall. This is not the case. **Figure 1.7** shows this doorway as viewed from the arch [redacted] This doorway is the only route for the applicant to access the rooftop [redacted] as per 1993 deeds. If he were to brick up this doorway, he would be:

- Accessing [redacted] without [redacted] permission
- Blocking off his own, only right of way to the rooftop, denying himself maintenance access
- Making unapproved structural changes to an Historic Party Wall without following the Party Wall Process.

We believe this is misrepresented in the architect’s drawings to intentionally sidestep the Party Wall Process.

[redacted] under no obligation whatsoever to permit the applicant access over any other part of [redacted] land as an alternative route.

22. Conclusion

This proposal relies on inaccurate drawings, specifically in the window-to-window measurements, and of land ownership boundaries, misleading statements in the Design Statement to disguise an unviable overdevelopment that relies on an unpermitted commercial baseline, [redacted] It directly breaches planning condition BEL. 1164/13, damages non-designated heritage fabric, lacks emergency fire access, breaches density limits, and destroys neighbour amenity, [redacted]

I recommend the Planning Officer visits the site to consider the facts raised in this document, particularly the Highways (manoeuvring, parking, necessary reversing for huge stretches of shared pedestrian/vehicle driveways), Overlooking and Loss of Amenity aspects. Figure 1.6 shows the view that would be seen from the proposed 'annexe'. [redacted]. Tudor Lodge is not even in view. It beggars belief that the applicant can claim that the proposal is not considered adjacent[redacted] when the title itself claims it is adjacent to Tudor Lodge which is not even within view! It is also immediately adjacent to (abutting)[redacted] outbuildings and garden.

I respectfully urge Amber Valley Borough Council to refuse planning permission for AVA/2026/0676 and coordinate this decision directly[redacted] to further investigate the unlawful creeping commercial developments already underway at Tudor Lodge.

[redacted]

Appendix 1: Corrected window-to-window measurements and relevant photos































