

Response to Planning Application Reference SMD/2024/0077

30 March 2024

We write in response to planning application reference SMD/2024/0077 submitted in February 2024 and validated by the Council on 5th March 2024 and outline our **OBJECTION** to the proposed development.

The application relates to the proposed erection of an agricultural and woodchip storage building on land at Basford Hall, Basford Green Road, Cheddleton, Staffordshire, ST13 7ER.

This response is a combined objection from a number of members of the community, as signed on the final page(s).

The reasons for our objection are summarised below and the justification is detailed on the subsequent pages:

- Insufficient information submitted as part of the planning application relating to its proposed use, impact on the landscape and heritage setting, and impacts on neighbouring uses.
- Incorrectly completed Application Forms.
- Lack of suitable access proposals.
- Insufficient supporting information and evidence including ecological and tree/hedgerow surveys.
- Impact on the landscape, its character and development on a currently greenfield part of the estate without utilising existing brownfield land on the estate, which is already well served by existing access roads.
- Impact on heritage assets, namely in the form of impacting on the historic parkland setting and listed buildings.
- Ecological impacts arising from the scheme itself and the broader implications in respect of encouraging further tree felling on the estate; and
- Amenity impacts on neighbouring uses which will be further increased depending on the ultimate end use of the proposed building.
- Whether the building should actually be B2 use classification rather than 'agricultural building'.
- The proposed building will set a threshold precedent and establish a new foothold for further staged development / buildings on a current greenfield part of the parkland landscape.

Note that the application was considered at the Cheddleton Parish Council Planning and Amenities Committee Meeting on 26 March 2024, where it received a unanimous objection for consistent reasons to ours.

Note also that the community were unaware of this proposal and submission of this application, as the applicant hasn't consulted any of us.

1. The Proposed Development

The Planning Statement submitted in support of the application states that the building is to provide storage for agricultural implements associated with the agricultural activities across the wider Basford Estate, along with the storage of woodchip to serve the two existing biomass boilers on the Estate, as approved under applications SMD/2013/0731 and SMD/2017/0145.

The Planning Statement identifies that the proposed building will occupy a footprint of 445sqm and stand to a ridge height of 8.5 metres.

It identifies that the applicant's land holding extends to over 300 hectares and is used for a variety of agricultural purposes including rearing sheep and cattle. The building is to be used for the storage of a variety of agricultural implements associated with the maintenance and working of the land, including tractors, trailers and a loader (amongst others), and will also be used for the storage of 20 tonnes (approx.) of woodchip.

Neither the submitted information nor plans identify any proposed works to provide an access road to the building.

The application states that the building location already has access in the form of agricultural tracks. There is no access to the location and the ruts in the field have been created from the relocation of unpermitted cut trees in recent months. Further, a number of members of the community who have lived here in excess of 50 years also confirm that there has never been a track in this location.

Application Forms

The description of development on the forms state that the proposal is for the erection of an agricultural and woodchip storage building. No mention is made of either access or an access track to the proposed building.

The forms also state that the site is not currently vacant. This is incorrect. The application site currently comprises undeveloped (greenfield) virgin agricultural land and therefore the forms should be amended to state that the site is currently vacant.

In terms of trees and hedges, the forms ask whether there are any trees or hedges on land adjacent to the proposed development site that could influence the development or might be important as part of the local landscape character? The forms state no but this is incorrect. As the Site Location Plan and aerial views show, the site is bound on its western and northern boundary by existing mature trees and hedgerow that will be affected by the development and form an important part of the landscape as well as the boundary of the historic farmstead and estate. The forms should note this and 'Yes' should have been selected.

Accordingly, a tree survey should be requested by the Council and provided by the applicant.

In terms of biodiversity and geological conservation, the forms state that there are no protected or priority species on or on land adjacent or near to the application site. However, previous applications in the area have noted bat activity and given there are a number of water bodies (ponds) on adjacent land in close proximity to the application site, which have the potential for Great Crested Newts. Appropriate ecological surveys should have been undertaken and submitted in support of the application.

The Council should request the above, and they should be provided by the applicant to ensure that all potential impacts of the development can be appropriately assessed.

The form notes that there are no industrial or commercial processes envisaged within the proposed development. Therefore, from the application it is assumed that the proposed building will solely be used for storage of wood chip rather than any process involving in chipping itself (see below in relation to our concerns on this). The Council will need to ensure that, if the scheme is approved, conditions restricting the use of the building to storage only should be included and enforced. This includes restricting the use or installation of any wood chipping machinery within or adjacent to the building now or in the future, which would result in additional impacts on amenity, noise, dust and vibration impacts on adjacent land users including the adjacent lambing shed at Sneyd Arms Farm.

2. Relevant Planning Policy

Staffordshire Moorlands Local Plan (September 2020)

Policy SS1

Policy SS 1 states that the Council will expect the development and use of land to contribute positively to the social, economic, and environmental improvement of the Staffordshire Moorlands in terms of a number of matters. Those of relevance to the proposals are:

- A healthy, safe, attractive, active, well-designed and well-maintained environment;
- Development which maintains the locally distinctive character of the Staffordshire Moorlands, its individual towns and villages and their settings;
- Development that is undertaken in a way that protects and enhances the natural and historic environment of the district and its surrounding areas, including the Peak District National Park, both now and for future generations;
- Support development which secures high quality, sustainable environments, efficient and effective use of resources and contributes effectively to tackling climate change and reduced carbon emissions.

The policy states that all proposals for development will be considered in the context of the district-wide Spatial Strategy and with regard to both its direct and indirect cumulative impact over the longer term. New development will make effective use of land and the best use of previously developed land and buildings.

Policy SS2

In terms of the settlement hierarchy, the site falls within 'Other Rural Areas' and comprises open countryside where development is normally unacceptable. Within these areas there are some groups of houses and hamlets, which are not identified as 'smaller villages' because of their predominantly open character and loose-knit nature. They also contain major developed areas, which may be suitable for appropriate development or redevelopment.

Policy SS10

The policy states that the other rural areas comprise the countryside and the green belt outside of the development boundaries of the towns and larger villages and the open countryside surrounding the smaller villages.

It states that these areas will provide only for development which has an essential need to be located in the countryside, supports the rural diversification and sustainability of the rural areas, promotes sustainable tourism or enhances the countryside.

Whilst the policy allows development that helps meets specific housing needs in the countryside, supports suitable development which secures the future conservation of heritage assets, and development that helps sustain the rural economy, predominantly through enabling the limited expansion or development of business for employment uses where a rural location can be justified, none of these matters relate to the proposed development.

Importantly, the policy requires development to enhance and conserve the quality of the countryside by (amongst other things):

- Giving priority to the need to protect the quality and character of the area and requiring all development proposals to respect and respond sensitively to the distinctive qualities of the surrounding landscape; and
- Encouraging measures which protect and enhance the biodiversity, geological resources and heritage of the district.

Policy DC1

Policy DC1 states that all 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 SPD.

The policy states that new development should (amongst other things):

- Be of a high quality and add value to the local area, incorporating creativity, detailing and materials appropriate to the character of the area;
- 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;
- 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;
- Promote the maintenance, enhancement, restoration and re-creation of biodiversity and geological heritage, where appropriate; and
- Provide for safe and satisfactory access.

Policy DC 2

The policy states that the Council will conserve and where possible enhance heritage assets, including their setting in a manner appropriate to their significance. This will take into account the desirability of maintaining and enhancing their significance and will ensure that development proposals contribute positively to the character of the built and historic environment.

It states that all applications likely to affect heritage assets will require the submission of a heritage statement, including a qualitative visual assessment where appropriate.

Policy DC3

The policy states that the Council will protect and, where possible, enhance local landscape and the setting of settlements in the Staffordshire Moorlands by:

- Resisting development which would lead to prominent intrusion into the countryside or have a significant adverse impact on the character or the setting of a settlement or important views into and out of the settlement, as identified in the Landscape and Settlement Character evidence;
- Supporting development which respects and enhances local landscape character, and which reinforces and enhances the setting of the settlement as identified in the Landscape and Settlement Character evidence; and
- Supporting developments which conserve or enhance the biodiversity qualities of any natural or man-made features within the landscape, such as trees, woodlands, hedgerows, walls, watercourses or ponds.

As part of the work on the setting of settlements, historic parklands and remnants of designed historic landscapes were identified. The council's Landscape and Settlement Character evidence, including the Landscape and Settlement Character Assessment, identifies the Basford Estate, including the application site, as remnants of parkland landscape.

The Assessment recommends that development should take account of the setting of the historic parklands, of the setting of important buildings and of important local views. It states that any proposals for development or land use change, which impacts upon the setting of an historic parkland must take account of the unique character of that designed landscape.

Policy NE1

The policy states that the biodiversity and geological resources of the District and neighbouring areas will be conserved and enhanced by positive management and strict control of development.

Policy NE2

States that the Council will protect existing trees, woodlands and hedgerows, in particular, ancient woodland, veteran trees and ancient or species-rich hedgerows from loss or deterioration.

This includes requiring new developments to provide tree cover that secures a good level of sustainability through tree retention, planting and soft landscaping. Landscaping schemes will also be required to mitigate against negative landscape impact and complement the design of new development and make provision for future maintenance.

The policy also states that the council will resist development that would directly or indirectly damage existing ancient woodland, veteran trees and ancient or species-rich hedgerows. The Council will refer to its adopted Tree Strategy in the consideration of proposals; and will in general seek to retain as many trees and as much hedgerow on site as possible.

3. Planning History

The planning history of relevance to the site and the proposed development is set out below.

Basford Hall Farm and wider estate

LPA Ref: SMD/2017/0145

In August 2017 planning permission was granted for the retention of a biomass building (LPA Ref: SMD/2017/0145).

The submitted Planning Statement noted that the biomass boiler installed within the building will be fuelled by wood pellets sourced from the woodland within the Basford Estate, and thus will derive a sustainable and renewable source of energy that will make a positive contribution towards cutting greenhouse gas emissions.

The officer's report notes that the application was for the retention of a biomass building, which was built without planning permission and was unauthorised by the Council.

The report noted that the building cannot be easily seen from the nearby listed dwellings and is in a location where it does not harm the settings of those buildings. It notes that the supplementary screen planting for the building would ensure the historic farmstead character and listed building settings would not be harmed.

LPA Ref: SMD/2018/0500

In October 2018, planning permission was granted for the change of use and alteration of a former stable block to form a single residential apartment (LPA Ref: SMD/2018/0500).

LPA Ref: SMD/2019/0590 and 0592

In September 2020, planning permission and listed building consent was granted for the conversion of Lodge Farmhouse into a dwelling and attached barn into ancillary accommodation to Lodge Farmhouse (LPA Ref: SMD/2019/0590 and 0592).

LPA Ref: SMD/2022/0654

In March 2023 planning permission was refused for a proposed new hardcore service pathway/track to existing Biomass Boiler across existing private agricultural land (retrospective permission) (LPA Ref: SMD/2022/0654).

The application was for retrospective permission, as the track had already been built in part without planning permission.

In considering the application, the officer's report noted that if the proposal is to take timber from the small woodland to serve the biomass boiler, it is not clear as to why it cannot be taken via the existing access. The application does not detail the volume of timber that is available and to be taken from this relatively small woodland. The woodland can only provide finite resource in these regards and would presumably be quickly exhausted – the road would have lasting impacts for what could

only be a temporary purpose. It can only be assumed, that to serve multiple properties, the boiler is burning imported pellets.

The Council's tree officer noted that it is evident from air photos and existing knowledge of the site that this is part of a historic country estate where there are mature parkland trees and woodland areas of great importance to the landscape character and potentially of significant biodiversity value.

LPA Ref: SMD/2023/0328

In September 2023, planning permission was granted for the proposed conversion of an existing agricultural barn into incidental accommodation including plunge hot tub (LPA Ref: SMD/2023/0328)

LPA Ref: SMD/2023/0307

In September 2023 planning permission was refused for a proposed new compacted hardcore service track to existing Biomass Boiler across existing private agricultural land (part retrospective) (LPA Ref: SMD/2023/0307). The application was part retrospective as it had already been implemented in part without planning permission.

The officers report noted that the application was a repeat second attempt application from refused application SMD/2022/0654. The previous application was refused because it did not provide sufficient information to properly assess the impacts on trees, ecology, heritage assets, and landscape character. The report noted that since the application was refused, further trees have been felled and a new additional roadway, not previously detailed, has been constructed and completed without planning permission between the south of Rock Cottage and farmland to the south-west of the Churnet Valley Railway.

The Council's Conservation Officer objected to the scheme noting that the landscape in this vicinity is historically associated to the Hall, noted as a monument: MST6178, with a date range of 1547-1899. It spans Peacock Wood, the Folly Tower and Bath House to the south, falling adjacent to the weir before heading north it encompasses the Hall and farm where it spreads widely in a west to east arc then encompassing the Lodge Farmhouse (lodges) and Barn.

The officer noted that these buildings are Grade II listed heritage assets within this parkland.

The officer noted that the Planning Statement did not discuss heritage or impact in any great detail and did not recognise the historic associations of the assets. It also did not explore impact, setting or come to any conclusion regarding harm or its justification.

The officer's report noted that Local Plan Policy SS10 restricts development to that which assists the rural economy in a sustainable manner whilst protecting the character and qualities of the countryside. Development must therefore be justified against that criteria.

The officers report noted that all the timber for the biomass boilers is currently imported to site from a supplier in Market Drayton. A total of 200 tonnes of chip is imported per annum to run the two biomass boilers, at a cost of £150/tonne, which collectively serves 14 properties across the Basford Hall Estate. During the winter there are two deliveries per week with an 8-tonne lorry, with those movements reducing over the summer months to around once every two to three weeks.

The officer noted that the applicant instead proposes to use the track to take the timber from his surrounding woodland. The approach of Local Plan strategy policy SS10 is to restrict development in

the rural areas to that which would be sustainable and bring benefit to the rural economy whilst protecting the countryside from harm to its character and appearance.

The officer considered that the development in those regards would not deliver benefits that clearly outweigh those harms to the countryside. Instead, it may lead to rapid deforestation and tree felling at an alarming rate that would be unsustainable and harmful to the character and appearance of the landscape and the setting of heritage assets.

The officer concluded that the development would result in conflict with policy SS10 of the Staffordshire Moorlands Local Plan 2020.

Further, the officer considered the impact on the historic parkland landscape character and in turn the setting of the listed buildings and the significance of the designated heritage assets. The officer considered that the setting of the Grade II listed buildings is provided by a historic country estate where there are mature parkland trees and woodland areas of great importance to the landscape character. The officer considered that the proposed development would not be respectful of its context, it would cause harm to the significance of the historic parkland and the setting of listed buildings.

Finally, the officer considered that the development would be an unnatural and alien feature that would appear to physically and visually interrupt the landscape with urbanising form. There would be harm to landscape character and the setting of designated heritage assets. There would be less than substantial harm to the significance of the assets, but harm that would not be outweighed by any public benefit. In these regards there would be conflict with policies SS10, DC2 and DC3 of the Staffordshire Moorlands Local Plan 2020 and the terms of the NPPF.

Surrounding Area

LPA Ref: SMD/2020/0178

In June 2020, planning permission was granted for a 173sqm agricultural building to provide a covered area for use as a lambing and kidding shed, winter sheep and goat shelter along with the storage of livestock husbandry materials and equipment on land at Sneyd Arms Farm, Basford Green Road (LPA Ref: SMD/2020/0178).

The building was 3.8m in height to eaves and 4.6m in height to the ridge.

The building has now been constructed and lies in close proximity to the proposed new building (on the other side of the mature hedge) outlined in the application now before the Council.

In approving application reference SMD/2020/0178, the case officer considered that:

- Design: the building would be discretely sited in a corner position against mature hedgerow backdrops to two sides. At 3.8m eaves and 4m ridge the building would be relatively low in profile.
- Amenity: the separation distance from neighbouring properties is sufficient to ensure no sense of intrusion from the development such as noise, odour or overbearing physical presence would be likely to arise, especially given the agrarian nature of the locality.
- Heritage and landscape: the LPA site visit confirmed the Conservation Officer assessment that this proposal would for the most part be unlikely to be seen in any public views in conjunction

with the Listed Buildings nearby – helped by the relatively low height profile of the structure and intervening boundary hedgerows.

- Further, the scale of the building and its proposed position also means that it would be unlikely to be seen prominently or even noticeably in any more wide-reaching landscape views. This is assisted via the high mature hedge row and trees to the south and east of the building, which screens the building from views from the west and the estate to the south.

The case officer concluded that, on this basis the building could be judged as being appropriately sized and given its relatively low height and secluded position away from public view without causing significant identifiable harm to amenity, landscape or heritage the proposal can be recommended for approval.

However, the officer noted that, as this decision was only reached on account of the agricultural need advanced in the application, it would be appropriate to attach a condition that should this need cease, the building should be removed and the land returned to open countryside. Condition No. 5 on the decision notice was therefore included, which requires the applicant to remove the building should the need for it cease to exist.

Planning History Key Conclusions

Following a review of the planning history associated with the site and surrounding area, the following key conclusions can be reached.

1. The officer's reports and conservation officer comments on previous planning applications note that the land surrounding the existing buildings form part of a historic country estate where there are mature parkland trees and woodland areas of great importance to the landscape character and potentially of significant biodiversity value. Concern has previously been raised around the felling of the trees on the estate, which impact on its character and existing biodiversity.
2. Officers have previously highlighted that 14 properties on the estate are served by the biomass boilers and during winter there are two deliveries per week with an 8-tonne lorry transporting 200 tonnes of woodchip.
3. Officers have previously noted that the approach of Local Plan strategy policy SS10 is to restrict development in the rural areas to that which would be sustainable and bring benefit to the rural economy whilst protecting the countryside from harm to its character and appearance. In refusing permission for previous schemes, officers have concluded that development that harms the countryside, and that which may lead to rapid deforestation and tree felling at an alarming rate that would be unsustainable and harmful to the character and appearance of the landscape and the setting of heritage assets.
4. Officers have previously considered that development that physically and visually interrupts the landscape with urbanising form is contrary to Local Plan and national planning policy.
5. There have been a number of recent planning applications for the conversion of existing agricultural buildings and barns on the site to residential and wedding venue accommodation uses. These agricultural buildings and barns were well placed within the site to be adapted to serve the two biomass boilers for the purposes proposed under this application

(SMD/2024/0077) without the need for further buildings to be built within the open countryside.

6. The applicant has a history of progressing new development proposals without planning permission.
7. The approval of an agricultural shed on the adjoining land at Sneyd Arms Farm, required it to be low in profile and screened from wider reaching landscape views, as well as the surrounding heritage buildings by the existing hedgerow / tree line.

4. Grounds of Objection

With reference to the planning policy context, and the relevant planning history of the site, our objection to the proposed development is set out below.

Landscape Impact

The covering letter submitted in support of the planning application considers that the design and appearance of the proposed building is typical of this type of building and is wholly in keeping with the wider character and appearance of the rural area and reflects the recommendations set out within the adopted Design Guide SPD.

The Council's Design Guide SPD (2018) identifies that:

- Paragraph 3.1: the setting of any building should be carefully considered, and attention should be paid to views into, over and out of the site.
- Paragraph 3.2: in the countryside, buildings should sit comfortably within the landscape.
- Paragraph 3.8: new buildings should respect the scale of those surrounding it

The proposed new building is located at a high point in the estate and will be visually prominent from views within the estate to the south west, south and south east and east and also from more wide-reaching views in these directions (see photo below)



The submitted covering letter largely ignores these important views and focuses solely on views of the site from the vehicular access to the estate to the east and from the neighbouring properties.

As noted in the officer's report for previous applications on the site, the impact on the historic parkland landscape character and in turn the setting of the listed buildings and the significance of the designated heritage assets was an important consideration.

The wider country estate forms part of the setting of listed buildings and the site forms part of the remnants of historic parkland. Development of the scale proposed in this location would also physically and visually interrupt the landscape with urbanising form. There would be harm to landscape character and the setting of designated heritage assets, which would not be outweighed by any public benefit.

In terms of the scale of the building, at 8.5 metres to ridge it is almost double the height of the agricultural smallholding shed that sits behind the mature trees and hedge to the east of the application site at Sneyd Arms Farm. It therefore does not respect the scale of surrounding buildings.

In determining the application for the agricultural building at Sneyd Arms Farm, officers considered that at 4.6m ridge height, the building would be relatively low in profile and, due to the vegetation screening to the south and west, it be unlikely to be seen prominently or even noticeably in any more wide-reaching landscape views.

The same conclusion cannot be reached for the current application. At 8.5 metres to ridge, its exposed location at a high point in the estate, which is visually prominent to wider views to the south and across the Basford Estate and beyond, it will visually interrupt and intrude the open nature of the countryside and would be detrimental to the parkland landscape.

As well as this, the building will tower above the adjacent hedgerows and Sneyd Arms Farm building, essentially placing it in clear line of sight seen from all directions.

The proposals also omit any details of proposals for an access road to the proposed building. The submitted covering letter does not mention any works to provide a suitable access route to the building and the Proposed Site Plan refers to an existing agricultural track with no changes proposed as part of this application.

First of all, there is no existing agricultural track in this location, as shown on the photo above and on the aerial image below.



As the aerial shows, there are tracks in the field recently left by the vehicle that has moved the felled trees to the field, but this is not an existing track. This is further shown on recent photo of the site below.



Previous applications and officers' reports outlined in the planning history of the site have identified that a significant number of vehicular trips are made to the estate to deliver woodchip. This includes an 8-tonne vehicle making two trips a week to the site to deliver woodchip to serve the biomass boilers. Without a purpose-built access road, an 8-tonne vehicle will not be able to use the existing field in the winter, as the field will quickly become impassable in wet weather.

It is assumed that details of a purpose-built track have been omitted from the application given the officer's previous views from refused application number SMD/2022/0654 and SMD/2023/0307 that such a track would have an impact on the landscape and would result in an incongruous form of development in this location.

We consider that a separate application for an access track would need to be submitted at a later date should the current application be approved. It is therefore likely that the scheme is being applied for in a fragmented manner to limit its perceived impact on the landscape rather than providing the opportunity for officers to consider the overall impact of the proposals on the landscape and character of the area.

The council should request full details of the access track to be included within this application, so the full impacts of the scheme can be appropriately assessed.

Linked to this, given that the application states that the building will be used for the storage of approximately 20 tonnes of woodchip, this comprises a large quantity of highly combustible material to be stored with *'agricultural implements associated with the maintenance and working of the land, including tractors, trailers and a loader (amongst others)'*.

No consideration appears to have been given to fire risk with the conflicting uses, particularly given the proposed proximity to the mature hedgerow, trees and the existing Sneyd Arms Farm Shed. Without a suitable access being provided, there is a significant risk that emergency vehicles (namely fire service vehicles) would be unable to access the building in an emergency, particularly during winter months, as the building would be inaccessible due to the likely ground conditions.

However, given that such an access would introduce more built development in a location currently greenfield in nature, we do not consider that such a scheme would be acceptable.

The proposal in its current form cannot therefore be considered to be in accordance with the Design Guide SPD and Local Plan policies SS10 and DC3.

Location

Along with its scale (height), the impacts of the proposed development on the landscape is predominantly driven by its location.

It is unclear why the applicant has chosen to locate the building in this location, on a previously undeveloped and exposed part of the 300+ hectare estate. Note too that this area of the estate is used by a long-term tenant for grazing cows.

As the plan below identifies, there are more appropriate opportunities within the estate to provide woodchip and agricultural storage on previously developed parts of the site, close to the woodchip boilers that could be screened from view from both wider landscape views and from the listed buildings themselves without the need to introduce new built form on open, undeveloped parts of the estate.

The proposed building, which is suggested to provide storage for woodchip to serve the biomass boilers on the estate, is also remote from the boilers themselves. There is an existing woodchip storage area on the estate, which could be adapted to provide a covered storage area if needed, again, without the need to introduce new development on previously undeveloped pastureland.

If the building is, as suggested, to solely provide storage capability, then there is no need for it to be provided in such a detached location from the rest of the built development on the estate.



As the plan above highlights, there is an existing woodchip storage area that could be used for the proposed development, which would be far less impactful on the landscape and character of the estate and parkland than the proposed location. This area is also served by an existing access road which would remove the need for additional access roads within the site to be provided.

This is further highlighted on the aerial plan below.

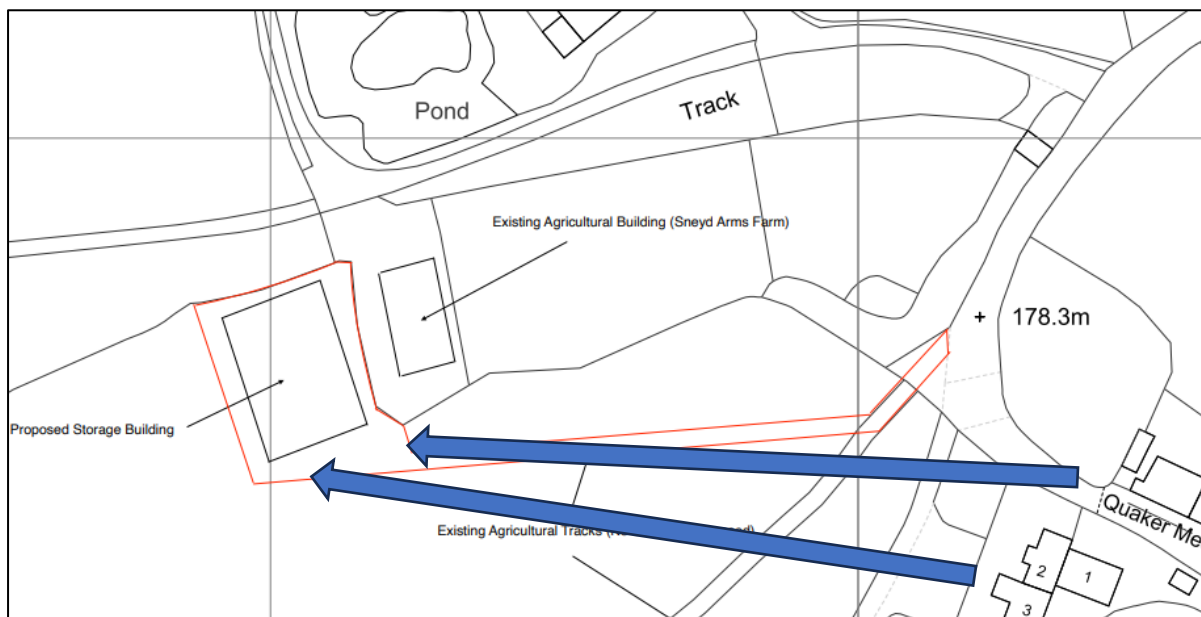


Heritage Impacts

In addition to the landscape impacts of the proposed development, the scheme also has the potential to impact on existing heritage assets in the form of introducing new built form in a currently undeveloped area of the historic parkland impacting and on the wider setting of the listed buildings.

No Heritage Impact Assessment has been prepared and submitted as part of the planning application to consider the potential impacts of development. The council should request that one is submitted, so the council can make an informed decision based on its heritage impact.

As can be seen from the submitted plan extract below, the proposed building is in direct line of sight of the listed buildings located at the entrance to the estate, namely Lodge Farm and Lodge Cottages.



As well as Lodge Farm and Lodge Cottages, there are Basford Hall Farmhouse, Basford Hall and Sneyd Arms Farm, all in close proximity and likely to have the proposed building within line of sight. Beyond this, there are also a number of listed buildings further west, for which the building will be in line of sight.

Ecological Impacts

The need for the new building and storage for woodchip appears to be linked to the recent, and unauthorised felling of a number of high-quality trees on the estate that formed a key part of the landscape character and setting of the listed buildings on the estate.

These trees (as shown in the photo below) were felled to accommodate the first part of an access track that was built without planning permission and was subsequently refused permission, as part of planning application SMD/2023/0307.

Once these trees are chipped and stored, there is an important issue that requires consideration, as to where the additional woodchip will come from.

As no formal access track is to be provided as part of the planning application, if one is not to be provided in the future, then one can only assume that further trees on the estate will be felled and chipped on-site and transported by tractor and trailer.

Not only does this raise questions over the type of building and its use proposed, which would involve industrial processes if wood chipping and drying equipment is to be provided in the building (i.e. use class B2?) and would have additional impacts on amenity in the area that have not been considered or assessed within the submitted planning application, but also ecological, landscape and biodiversity impacts should more trees on the estate be felled.



The Google Earth Aerial dated June 2023 below identifies the areas where some trees have been felled on the estate to date.



In considering the refused application for a new access track proposed under application SMD/2023/0307, the officer considered that the development would not deliver benefits that clearly outweigh those harms to the countryside. Instead, it may lead to rapid deforestation and tree felling at an alarming rate that would be unsustainable and harmful to the character and appearance of the landscape and the setting of heritage assets.

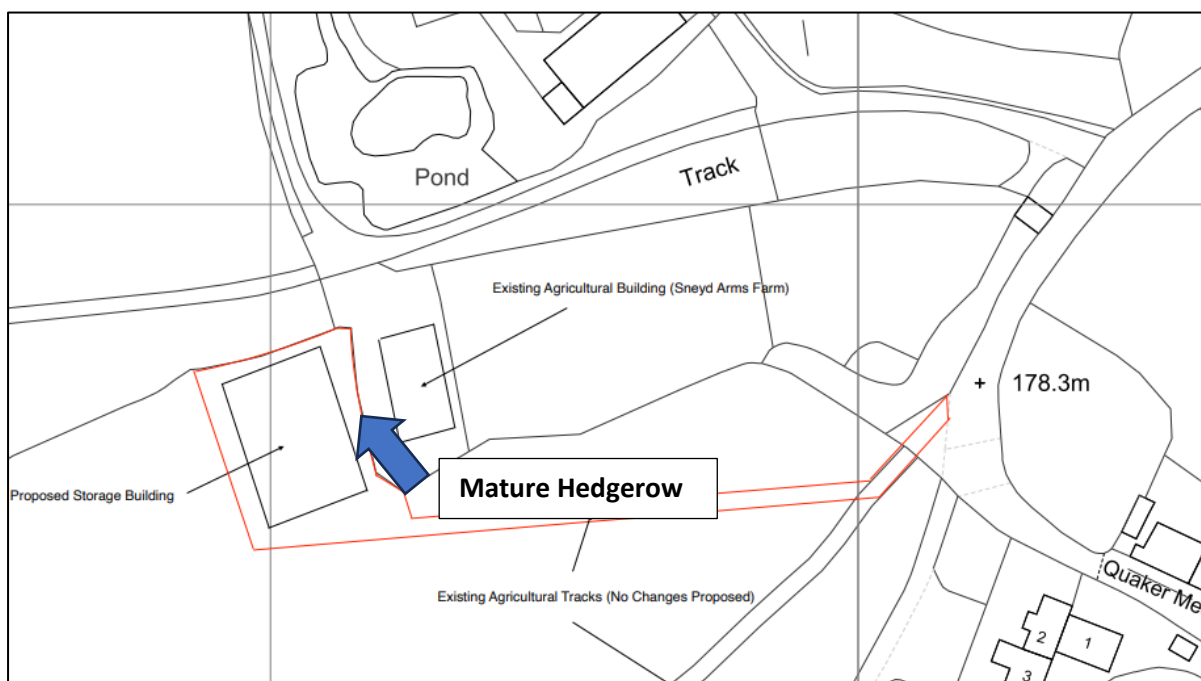
Given that the proposed woodchip storage has apparently arisen due to the need for woodchip storage arising from the felling of trees on the estate, the same conclusions could be reached for this proposal. The trees on the estate are clearly at risk of further felling (either through authorised or unauthorised works), which will lead to a loss of biodiversity and carbon storage, and importantly will lead to a degradation of the historic country estate and its parkland setting to the detriment of the heritage assets.

As the council has previously concluded, it should not be enabling development that will ultimately lead to further loss of trees on the estate and if those trees are at risk and provide an important feature of the landscape and heritage setting, then the council and the tree officer have a range of options to protect and prevent further loss. The trees are clearly at risk given the number of mature trees that have been felled recently within the estate.

The submitted application has not considered the impact on ecology or existing trees/vegetation, as part of this application and no ecological surveys have been carried out.

Given the location, footprint and height of the building, the proposals will screen the exiting mature hedgerow and trees from direct sunlight, particular that which is located between the existing Sneyd Arms Farm agricultural shed and the proposed building.

The quality and longevity of this mature tree/hedgerow boundary, and the biodiversity that it supports, will be put at risk and could lead to it dying out and requiring removal in the future. This could result in additional visual and amenity impacts arising from the proposed scheme on the landscape and adjacent land uses.



Further to this, we are fully aware given the number of ponds adjacent to the location of the proposed building that there are Great Crested Newts, which have not been considered as part of this application. Given there are existing ponds within the vicinity of the site, suitable survey information should be requested and submitted to support the consideration of the planning application.

Within the pile of felled trees has been located on the site recently, there is also potential that other protected species are using the cover created and this should be properly assessed before further activity is undertaken on the site.

Based on the above, the impacts of the development have not been properly considered by the applicant and the proposed development is therefore, in part, contrary to Local Plan Policies DC1, DC2, DC3, NE1 and NE2, which seek to protect the character of the landscape, biodiversity and trees.

Proposals that further encourage the felling of trees will also lead to impact on the historic parkland landscape character and in turn the setting of the listed buildings and the significance of the designated heritage assets.

Impact on Amenity

The application states that the building height will be 8.5m at the ridge. This is disproportionately high compared to the existing Sneyd Arms Farm Shed, which is 50% lower in height to its ridge.

The proposed location of the building is in direct line of sight of a number of residential properties including the listed properties at the entrance to Basford Hall, as well as Basford Hall Farm and the listed properties within the Basford Hall itself. It will also impact the current open views of the Churnet Valley and will therefore be visually prominent in a location that is currently undeveloped in nature.

Given the huge stockpile of felled trees in the location of the proposed building, its excessive height etc. concerns have been raised around the ultimate use of the proposed building and the likelihood of it including industrial processes in the form of wood chipping and drying equipment if not properly restricted.

Given that the two woodchip boilers on the Basford Hall Estate serve at least 14 rental properties (an increasing number of which are now being converted to wedding accommodation in association with Consall Hall and Gardens) from which the applicant charges the tenants for the hot water that comes from the woodchip boilers, there is a question whether the use classification of the 'agricultural building' is actually B2 rather than just agricultural storage given it will may be used for commercial woodchip production, storage and ultimate sale?

If more industrial processes are introduced / carried out on the site now or in the future then the building and its location is likely to lead to the following impacts.

Noise

As highlighted above, there is currently a huge stockpile of mature felled trees in the location of the proposed building waiting to be chipped. It should therefore be questioned how the applicant proposes to chip all of this? It can only be assumed that the applicant will be bringing in a chipping machine on a permanent basis (given the quantities of woodchip required) and given the stockpile is

located in the vicinity of the building, it is almost certain that the chipping will take place in the same locality. Once this stockpile has been chipped, we assume that it will be replenished on a continuous basis to 'feed' the woodchip storage and the woodchip boilers both on site and possibly elsewhere. Again, as above we therefore question the use classification of this application, as well as where the trees will be coming from in the first place.

We assume that the applicant has considered the noise that will be produced from this process, hence locating it to the extent of the landholding away from the applicants' house and tenanted properties. However, clearly the applicant hasn't considered the impact on the existing Basford Green Community.

As the building location doesn't have any utilities (or drainage) and none are indicated to be needed as part of the application, it can only be assumed that any wood chipping process will be diesel powered.

Over at the Pointons Plant they also have wood chipping facility, which can be heard clearly by the properties in Basford Green, even from that distance. The noise from a similar facility / process, so close to the adjacent residential properties and livestock will clearly have a huge impact. A useful comparison is when you walk past a tree surgeon using a small-scale mobile chipper for branches etc. the chipping noise is deafening – hence the operatives have to wear ear defenders. We ask what will be the noise impact from an industrial scale chipper that will take the cut tree stockpile and future supplies with girths in excess of 24", as per the photograph of the trees in the existing stockpile below?



At Breeze House, they have a menage that is regularly used for dressage practice (for which the horses are easily spooked) and has been for about 20 years – what impact will the proposed ‘facility’ going to have on such activities? This alongside the impact on the adjacent Sneyd Arms Farm lambing shed not to mention the nesting birds and ducks on the nearby pond, as well as the residents themselves.

If the proposed building is to be used for such purposes, then the application should clearly set this out and appropriate evidence submitted to demonstrate that the impacts have been considered. Otherwise, any such use should be strictly controlled through conditions and enforced.

Dust

In a similar way to the noise associated with wood chipping, clearly such processes and storage produce a considerable amount of dust. What consideration has the applicant given to dust pollution on both the existing residencies, their livestock and the established wildlife habitats and ecology in general associated with the adjacent ponds, mature hedgerows and trees etc?

Vibration

Similar to the above, the applicant appears not to have considered the vibration impact on the adjacent habitats (pond included) and the surrounding residences. Clearly there will be significant vibration from the size of chipping plant required to chip +24” girth trees that are in the recently located stockpile.

5. Conclusion

In conclusion we confirm our objection to application no. SMD/2024/0077 for the following reasons:

- Insufficient information submitted as part of the planning application relating to its proposed use, impact on the landscape and heritage setting, and impacts on neighbouring uses.
- Incorrectly completed Application Forms.
- Lack of suitable access proposals.
- Insufficient supporting information and evidence including ecological and tree/hedgerow surveys.
- Impact on the landscape, its character and development on a currently greenfield part of the estate without utilising existing brownfield land within the estate, which is already well served by existing access roads.
- Impact on heritage assets, namely in the form of impacting on the historic parkland setting and listed buildings.
- Ecological impacts arising from the scheme itself and the broader implications in respect of encouraging further tree felling on the estate; and
- Amenity impacts on neighbouring uses which will be further increased depending on the ultimate end use of the proposed building.
- Whether the building should actually be B2 use classification rather than 'agricultural building'.
- The proposed building will set a threshold precedent and establish a new foothold for further staged development / buildings on a current greenfield part of the parkland landscape.

We feel that the application is a suitably vague to hopefully obtain permission for an agricultural building that will ultimately be used for a different purpose through a series of staged applications.

We question the need for the building when the applicant already has woodchip storage and is also currently converting 'surplus' ready-made agricultural buildings right next to 'Woodchip Boiler 2' to profit making residential / wedding accommodation that could have been used, extended etc. for the uses proposed under this application.



Planning application SMD/2023/0328 (Proposed conversion of existing agricultural barn into incidental accommodation including plunge hot tub) to be used in associated with the wedding venue at Consall Hall and Gardens, was permitted less than 6 months ago (decision date 28/09/2023). Surely the applicant would have known less than 6 months ago that he had a need for agricultural and woodchip storage and therefore the buildings identified under SMD/2023/0328 and the adjacent existing hardstanding areas could have been used / adapted for the needs identified under this application.

The application states that the building will be used for the storage of approximately 20 tonnes of woodchip, along with *'agricultural implements associated with the maintenance and working of the land, including tractors, trailers and a loader (amongst others)'*. Given the land for which the building is to be located has a long-term tenant farmer, who has his own farm and buildings just down the road, again, we question the size, need, use and location of the building.

Over and above this, a building of this height and size, in this location will set a precedent and create a foothold on currently greenfield land, which will make it difficult to refuse further applications, as the impact on the surrounding landscape, heritage buildings etc. will have already been set.

Our objection also completely aligns to the Cheddleton Parish Council's unanimous objection at their Planning and Amenities Committee Meeting on 26 March 2024.

We thank you again for providing us with the opportunity to comment on this application and if we can provide any further information, we would gladly assist.

Name: Stephen Dawson	Address: Sneyd Arms Farm, Basford Green, Leek.
Signed:	ST13 7ER
Date: 30 March 2024	

Name: Peter and Dianne Ouseley	Address: Hilltop, Basford Green, Leek. ST13 7ER
Signed:	
Date: 30 March 2024	

Name: Sir Lee Pearson	Address: Springs cottage Farm, Thorney Edge Road,
Signed:	Bagnall, ST9 9LE
Date: 30 March 2024	

Name: Helen Spooner & Sam Brookes

Address: Fairhome, Basford Green, Leek. ST13 7ER

Signed:

Date: 30 March 2024

Name: Dave and Lynda Pearson

Address: Breeze House, Basford Green,

Signed:

Leek. ST13 7ER

Date: 30 March 2024

Name: Scott and Elizabeth Garrity

Address: Sunnyside, Basford Green,

Signed:

Leek. ST13 7ER

Date: 30 March 2024

Name: Janet Saddler

Address: Cannon Cottage, Basford Green,

Signed:

Leek. ST13 7ER

Date: 30 March 2024

Name: Craig and Margaret Dawson

Address: The Weathercock, Woodhouse Lane

Signed:

Biddulph Moor. ST8 7RW

Date: 30 March 2024

Name: Stephen and Pauline Spooner

Address: 47 Ostlers Lane, Cheddleton,

Signed:

Nr. Leek. ST13 7HS

Date: 30 March 2024

Name: Darren Pearson

Address: Ringe Hay Farm, Basford, Leek. ST13 7ET

Signed:

Date: 30 March 2024

Name: Damien Pearson

Address: New House Farm, Tomkin Lane, Stanley.

Signed:

ST9 9LY

Date: 30 March 2024