

Mr P. and Mrs L. Challinor
Laburnum Cottage,
Caverswall Common,
Caverswall,
S-O-T,
Staffordshire,
ST11 9EU



10th November, 2025

Re: Planning Application Reference: SMD/2025/0385, Higherland Farm

Dear Sir / Madam,

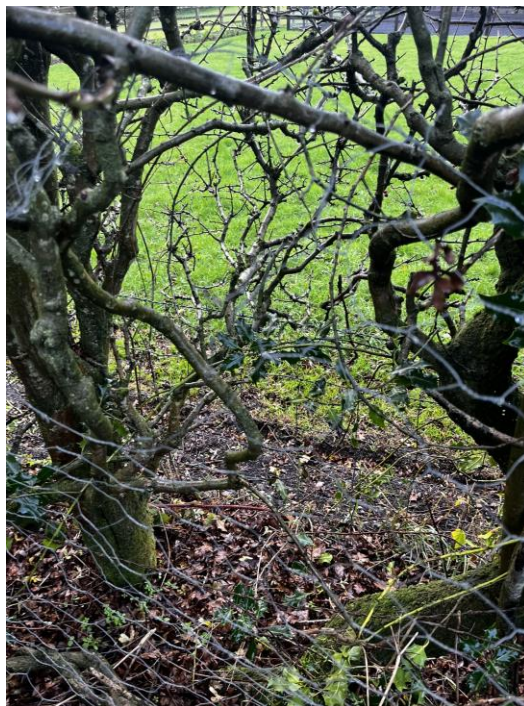
We strenuously object to this application. The development of a stone merchant in the green belt field right next to our house would have very serious impacts on our lives.

We would suffer from a huge increase in noise from a working yard with large lorries passing within a few short metres of our living room with all the accompanying rumble and vibration as well as being overlooked by the drivers of these lorries who would easily see into our garden and patio area. We would experience a severe loss of privacy as lorry drivers would also be able to see into our rear living room window. We also have three windows on the West side of the house facing the paddock which would be overlooked and also suffer from reduced natural light from the **proposed tree planting**. Conifers that would have roots which could extend under our plot towards the foundations of our house and **also interfere with the mains Caverswall Common / Sandy Lane sewage and storm drains situated close to the proposed new tree line.**

We would be directly by the noise would generated from the engines of large trucks and lorries moving, starting up and idling, reversing beepers continually sounding from lorries, forklifts and mobile HIABs, the crash and clatter from the loading / unloading of trucks, trailers and lorries and the chatter from workmen and visitors to the site. Our house would change from a dwelling enjoying peace and quiet in a rural, residential area to one suffering from the effects of industrial operations right next door to us. We would suffer from dust clouds in dry weather blowing across our garden and house, a reduction in air quality from smelly exhaust fumes and the dust kicked up from hard standing areas and excessive noise and visual intrusion. It is worth pointing out that most of these operations would occur much further away from the applicant's own dwelling as they obviously would prefer us to take the brunt of the inconvenience.

It is also worth noting that the applicants already have a wide gate which allows direct access through their yard to the buildings and the horse ménage where change of use has been sought. In fact, this route would offer closer access to the proposed storage areas than the new gateway the applicants have requested. These gates have always been used by past residents to access the paddock for maintenance purposes and to access the large green shed to park agricultural machinery which was originally the main business of the previous owners. The paddock was used for horse grazing as the previous owners were keen equestrians.

The existing hedgerows between our property and Higherland Farm are proposed to be kept but the owner of Higherland Farm has recently cut them back right to the boundary so that you can now see straight through the hedge with holes so big as to look like windows between the two properties. They have also dug round the bases of all hedges in an effort to remove any evidence of native hedgerow plant species. These hedges would serve as very little protection either audibly or visually for neighbouring properties. We include some photos of same.



New developments are required, **under planning law, to avoid significant adverse impacts on health and quality of life from noise and disturbance and to ensure the development is appropriate to the location.** The paddock the applicants wish to use is protected green belt and hence inappropriate for this type of operation. If approved, **it most certainly would adversely affect the quality of our lives and our mental and physical health.**

We note that the approved **Staffordshire Moorlands Local Plan** does not identify the local area, including Caverswall Common, as being suitable for this kind of development. This type of industrial operation would introduce non-agricultural / horticultural industry into the area and hence be in **contravention of the aims of sustainable rural development of green belt areas** especially since it is an area not identified in the approved **Staffordshire Moorlands Local Plan**. Guidance in the NPPF sets out a general presumption against development in the Green Belt unless there are exceptional circumstances. This planning application does not meet the criteria for exceptional circumstance. The suggested **economic benefit stated in the application is minimal at best and would mostly be felt by the applicants.** If the proposed business was to fail given the saturated local market of businesses selling Indian stone, paving etc., then the site would effectively become a grey / brown fields site which would make subsequent change of use applications more likely to succeed. This could make a planning application for residential homes on the site more likely to be approved. There are very few, if any, young families living in the area and so there is little need for more affordable residential properties. Again this application would not meet the criteria for exceptional circumstance. The location for this proposed development is **NOT GREY BELT. It is protected green belt.**

Granting permission to change a green belt site into a brownfields / grey field site, especially when it is not identified in the Staffordshire Moorlands Local Plan could set a **dangerous precedent** whereby, if approved, future planning applications may cite this site as showing a precedent and therefore possibly open the floodgates for similar types of planning application thus surrendering some control of the authority's ability to plan green belt development effectively. If granted this operation would be **harmful to the openness, character and landscape** of Caverswall Common; an area known for its natural

beauty within touching distance of special landscape and conservation areas. This area is a quiet, rural, residential part of the Staffordshire Moorlands with a history of farming, agriculture and horticulture which are all perfectly in keeping for the area.

There are many local businesses cited in the application as a precedent for planning approval. Caverswall Creamery sells on site produced milk shakes and dairy products. Gravelbank and Martinvale nurseries were traditional nurseries growing plants on site and were both established between over 50 and over 60 years ago. Hardwick Farm and Ward Hill Farms are not working businesses. AG Services is mainly an agricultural machinery repair business as the name suggests also providing grass cutting and hedge cutting services to the local community. It is not a car body repair shop. The Stone Valley operation takes place on a site that has been used by heavy industry / quarrying for well over 70 years and it has its own dedicated access road off the A520. None of these operations cause or have caused in the past, the type of disruption to the lives of local residents that would result from a builder's merchants slapped in the middle of a residential area with very poor road access.

The application sets an estimate of the amount of vehicles visiting the site daily. The estimated number of vehicles is designed to seduce the reader into believing that there won't be much of a vehicle increase on the roads. **In our view it represents a serious under-estimate of the possible traffic flow to the site**. Assuming, however, that the estimates are accurate it supplies further evidence that the business plan is unlikely to be economically viable. Indian Stone is best priced when importing from abroad. Sellers would not be so foolish as to not take advantage of the price differences between sourcing abroad and sourcing locally. Sourcing from abroad would mean that deliveries would take place via much larger vehicles, probably as much as 38t and 44t lorries due to economies of scale. The local roads have weight restrictions and are not designed to take constant heavy traffic of this nature. They are not even designed to be continually used by trucks carrying loads heavier than 7.5t. The roads are already badly damaged with large potholes and surface degradation costing authorities much money to constantly maintain. Grass verges are regularly mauled by traffic pulling over to make way for oncoming vehicles. Most of the lanes are not wide enough for two cars to pass let alone much wider vehicles. Caverswall Common itself is not wide enough for two lorries to pass each other safely. The many blind bends on all approaches to Higherland Farm **constitute a real and present danger to all motorists, pedestrians, joggers, dog walkers, hikers and horse riders**. These groups of people would have their risk of accident dramatically increased due to much greater and heavier traffic flows. We include some photos of just a few of the blind bends on the Common.



There is very little that the applicants could genuinely do to mitigate traffic flow and queuing on Caverswall Common no matter how genuine they may be in wanting to reduce the traffic effects of a successful business on the local community. Operational systems and processes cannot fully control timings of deliveries from widely dispersed sources and customer bases. Heavy goods vehicles traversing busy narrow lanes and blind bends are a recipe for disaster.

There is a high level of equestrian activity in and around Caverswall Common which offers a rewarding recreational outlet for many people as does the hiking, jogging, cycling and dog walking opportunities.

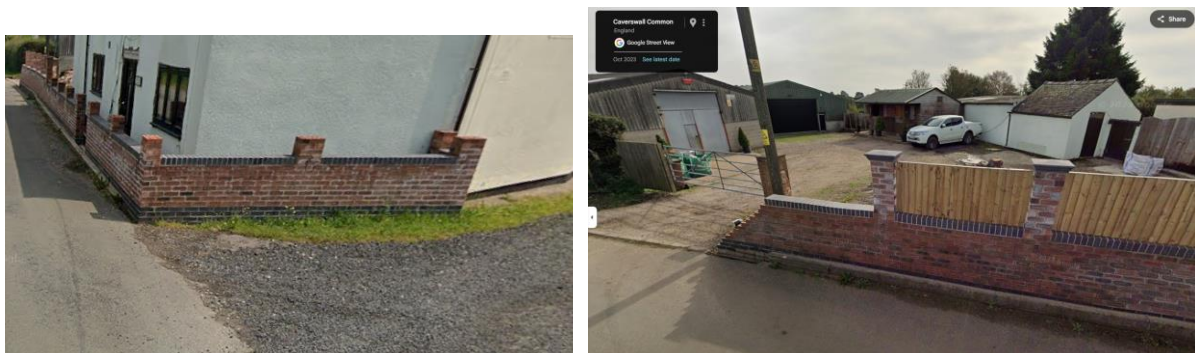
Since the coronavirus pandemic green belt areas have seen a dramatic increase in people visiting as more people have come to realise the importance of green spaces for their mental, social and physical wellbeing. It provides opportunities for a large section of the population to interact with green space, nature and cultural heritage. If consent was to be given for this application, **it would be of serious detriment to the much wider community who regularly use the Common for their daily exercise and enjoyment.** Who wants to walk / ride past a dusty, smelly and noisy industrial operation whilst risking life and limb on very busy and dangerous narrow lanes?

On a practical note we highlight the **presence of sewage and storm drainage** which runs directly under the proposed new gateways and which does so at only at a very shallow depth. This sewage etc. serves all the houses East of Higherland Farm and also those in Sandy Lane. I believe there is an inspection chamber right where the gateways are proposed and this area is located in a natural dip in the road which regularly floods. Mains water runs parallel to the northern hedge serving ALL properties on Caverswall Common. The **plans submitted are inaccurate as they show boundaries which are different to those in the Land Registry.** The applicants, since moving in just over 3 years ago, have built a wall near their house claiming some county council land. A quick look at Google Earth will confirm the boundary creep and hence a blatant disregard for due process. The wall on the junction of Caverswall Common with Sandy Lane is higher than 1m and constitutes a clear hazard for motorists. **Was planning permission sought for this?** We include photos of before and after building the wall.

October 2021



October 2022



We come now to the **Environmental Report** produced for the applicants by Charnia. We **dispute its conclusions and findings** in many areas. The evidence collected and upon which the report is based is very narrow and does not constitute a concerted effort by Charnia to properly investigate the biodiversity of the site. It is based on one site survey, a desktop exercise and anecdotal evidence from the applicants. **No local resident or farmer has been consulted. No neighbouring properties have been approached to allow access to ascertain neighbouring biodiversity / evidence.** As We mentioned earlier ground work by the applicants had already taken place prior to the survey to show the site in the best light for a positive spin in an environmental report. A scorched earth policy has been

followed under hedgerows. Thinning of existing hedges has taken place and removal of plants from borders. It is also worth noting that since the application was placed **the owners have put in a young laurel hedge on the southern boundary**. Laurel (with the exception of bay laurel which is a different genus) is well known to be highly poisonous to sheep, cattle and horses. Since the applicant holds a HND in horticulture he should know this and it shows a **blatant disregard to the future needs of the owner of the neighbouring field** who may wish to keep cattle, a horse or other livestock in that field. His neighbour was not consulted about the plants to be used in the hedge. Hard core has been dropped on green belt areas and a lorry container and poly tunnels placed on that paddock. **The site is already being put in danger of over development of a green belt site.**

1. Apparently all standing bodies of water within 250m of the site were assessed "where accessible". We have a large 7m diameter wildlife pond teeming with amphibians including newts, frogs and toads and provides a home to mayflies, dragonflies and other insects as well as a plethora of visiting birds including herons. We have never been approached by Charnia for any access to look at the pond. How can the claim then be made that there is no evidence of Great Crested Newts?
2. [REDACTED]
3. The report states that the nearest recording of our native blue bell occurs 984m away at Stansmore Grasslands. In practice anybody living locally can tell you that **native blue bells** flourish in all the hedgerows and gardens locally including my own only a few short metres away from that paddock. The applicant would know this as they have grown in his own hedgerows for decades.
4. Bats are known to roost in Rose Cottage next to the proposed site.
5. The report states there is no evidence of Barn Owls. All neighbouring properties are aware of **Barn Owls** that nest not more than 5m away from the paddock where the development is proposed. I regularly see owl pellets dropped on our path neighbouring that paddock as the owls actually perch on our roof when catching their prey from this paddock. We include a photo taken on the 8/11/25 of the barn owls currently nesting in a brick shed on the site of Rose cottage. Barn Owls are a schedule 1 listed bird and are protected.



6. The amount of broad habitat that will be destroyed by the proposed development amounts to at least half and probably more of the existing green belt area. It is certainly more than the 25m²

that the De minimis rule states as possible grounds for exemption from the Biodiversity Gains legislation passed in 2024 whereby developments have to show a 10% increase in biodiversity. The **Environmental report itself says there is little chance of that criteria being met** and so the application **claims exemption from the rule based on De minimis criteria**. A very quick look at the possible exemptions, however, quickly shows this **exemption claim to be spurious**. The UK's De minimis exemption for biodiversity law applies to developments that have a minimal impact, specifically affecting less than 25 square meters of none priority onsite broad habitat **and less than 5 linear meters of onsite linear habitat (like hedgerows)**. Looking at the plans submitted by the applicants the amount of linear habitat that will have to be removed in order to accommodate the gateways **would far exceed 5m and in fact would be well over 7.3m**. The new access would also destroy a substantial portion of the grass verge and fill in a wide area of existing ditch work put in place to reduce the flooding of that paddock and the road. The **application will not meet the Biodiversity Net Gain requirement and neither does it meet the criteria for exemption under the De minimis rule.**

The main aims of the legislation for Green Belt Protection are the limiting of urban sprawl and providing space for recreation and environmental preservation. This application does nothing to support recreation and environmental preservation. It does not propose to support forestry or agriculture and hence it does not fall within the definition of agriculture as stated in the Town and Planning Act 1990. It is therefore not in keeping with a rural community.

We are very aware of the strong local feeling against this application. It has very, very little support if any from locals. We strongly feel that there are no grounds upon which this application should be granted. The economic argument put forward is weak and lacks credibility. The environmental impact considerations are ill considered as are the impacts on highways, road users and pedestrians. The mental and physical wellbeing of locals and immediate neighbours has not been considered. Planning law and SMDC's own local policies are not on the side of this type of development in this type of area and the application challenges normal planning codes of practice and long term sustainability goals. The development is unsympathetic to local character, not in keeping and opposes the spirit of the legislation surrounding green belt protection.

We respectfully request that this application be refused.

Yours sincerely,

Peter and Lynn Challinor