

Reading Agricultural Consultants

Staffordshire Moorlands District Council

Land at Blakelow Farm, Ipstones

Proposed Agricultural Building

Consultation Response

April 2022



Staffordshire Moorlands District Council

Land at Blakelow Farm, Ipstones

Proposed Agricultural Building

Consultation Response

April 2022

1. Introduction

- 1.01 Reading Agricultural Consultants Ltd (RAC) is instructed by Staffordshire Moorlands District Council to provide an independent agricultural comment in relation to a planning application (SMD/2021/0676) for the erection of an agricultural building on land at Blakelow Farm, Ipstones.
- 1.02 In response to the instruction RAC has had regard to:
- (i) the national and local planning policies relevant to agricultural developments;
 - (ii) the planning application form and supporting plans and drawings;
 - (III) A Design and Access Statement prepared by DBD Architectural Consultancy;
 - (iv) an Agricultural Need Statement prepared by Graham Watkins & Co;
 - (v) a report to the Planning Applications Committee 27.01.22; and
 - (vi) standard sources on the design of agricultural buildings.
- 1.03 RAC's comments are based solely on the above material and there has been no contact with either the applicant or his agent. The application site has, however, been viewed from the public highway.

2. Planning Framework

- 2.01 The planning context for the proposed development is provided by the National Planning Policy Framework (NPPF 2018), and the adopted policies of the Staffordshire Moorlands Local Plan (2017).
- 2.02 The NPPF is based on an overarching principle of support for sustainable development. Although policies remain for the protection of the countryside from unnecessary and inappropriate development, the NPPF is supportive of development underpinning a

prosperous rural economy. To this effect the planning process is encouraged (para 84) to promote a strong rural economy through, among other measures, the promotion of:

“--- the development and diversification of agricultural and other land-based rural businesses;”

- 2.03 The presumption in favour of sustainable development is re-iterated in Local Plan Policy SS 1 in which are set out the development principles applicable to all types of development. Those developments which are considered relevant in the general countryside, including Green Belt, are identified in Policy SS 10. Provision is made in this Policy:

“--- 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.”

- 2.04 Action to sustain the rural economy includes *“Supporting the diversification of existing farm enterprises.”*
- 2.05 All development is subject to detailed sustainability and design policies which seek to minimise impact on the environment and countryside. Policy DC 1 sets out design considerations to which new development should have regard. These are matters largely outside the scope of this consultation response.

3. The Proposed Development

- 3.01 The proposed development comprises the erection of a steel portal frame building formed of three bays. The Agricultural Need Statement describes the building as being for the purposes of storing fodder and machinery and the housing of livestock. Application drawing PL13G shows the building as having a footprint of 13.5 by 9.08 metres i.e., 122.58 sq m.
- 3.02 The building is 3 m to eave height and 4.17 m to the ridge. It has a 1 m basal wall of concrete panels with Yorkshire boarding above. The roof is formed of cement fibre panels with clear roof lights on one elevation and solar panels on the other. Access into the building is by doors located in each of one long elevation and one gable.
- 3.03 Access to the building is by means of a new length of track connecting to an existing means of residential access to the highway. The track will be formed of compacted hardcore with a surface of road plannings.

4. The Agricultural Context

- 4.01 The proposed building is associated with land which is stated to have been in the applicant's farming family for some 65 years. The holding currently comprises 16.7 ha split between 13.8 ha located to the north of Bottom Lane and 2.9 ha to the south, which includes the application site.
- 4.02 The land to the north of the lane is utilised for the production of silage. All the general field work is stated to be undertaken by the applicant to produce a silage crop, which is sold

standing. The southern area of land provides grazing utilised by sheep held in a share farming arrangement with a Mr Heath of Bradnop. Out of the latter's total flock of 400, some 40 ewes are supported on the applicant's land, and he takes a share of the lamb crop.

- 4.03 The applicant was previously engaged in dairy farming and utilised a group of buildings adjoining the northern side of Bottom Lane and now referred to as Little Blakelow Barn Farm. The dairy enterprise was terminated in 2008 and the site has subsequently been redeveloped. Planning consent was granted for the conversion of a stone building to residential use (DET/2016/0010). The conversion proposal entailed the loss of the dairy parlour and additionally involved the removal of other associated livestock and storage facilities. An extension to a remaining agricultural building was permitted in 2020 (SMD/2020/0706) in association with the barn conversion, with the whole development site stated to have been severed from the applicant's farm holding.
- 4.04 Contemporaneously with the proposed extension of the building at Little Blakelow Barn Farm, an application (SMD/2020/0709) was made to provide a further building on the land to the south of Bottom Lane (the current application site) to compensate for the loss of other buildings at the former location. Consent was refused in March 2021 on the basis that an essential need had not been demonstrated and there were concerns about its design and impact on the countryside. The current application re-visits the proposed development. The revised Design and Access Statement and the newly submitted Agricultural Need Statement are assumed to accurately describe the relevant agricultural circumstances.
- 4.05 Examination of aerial photography indicates that the developments at Little Bakelow Barn Farm and the change in the ownership of that unit have effectively left the applicant's residual holding without any built facilities.

5. Appraisal

Need

- 5.01 The submitted material indicates that the applicant occupies 16.7 ha of land and states that he is actively engaged in the farming of that land in terms of grassland management and of a supporting role in the husbandry of sheep. This is a continuation of a long family farming association with the land.
- 5.02 In so far as the agricultural tasks undertaken involve storage and animal welfare considerations which are perceived by the applicant as requiring the availability of an appropriate building, the holding no longer has access to pre-existing buildings. RAC takes no view on the agricultural merits of the decisions occasioning the loss of those buildings or the severance of their site from the applicant's holding. If, however, a new building is now required, the fundamental reason for it and on a new site derives from the decisions taken in respect of the assets now comprised in Little Blakelow Barn Farm.
- 5.03 The Agricultural Need Statement suggests that machinery is currently stored outdoors, and the sheep are managed without any access to shelter (Section 3.0 1 and 2). Notwithstanding

that this is a situation created by the applicant, it is one which is, in principle, unsatisfactory from an operational and animal welfare perspective.

- 5.04 Although external storage is a common feature of farms, it does not represent best practice. In respect of equipment and machinery, external storage exposes items to unnecessary deterioration and damage from the effects of weather, which has a consequential cost in repairs and replacement. There is also a greater risk of theft or interference with items not stored in a secure manner. Given the rise in rural crime, increased security on farms is recommended by both the police and insurers.
- 5.05 Although the number of animals on the holding is relatively small, the applicant is statutorily responsible for their welfare while they are on his land and in his care. The Defra Code of Recommendations for the Welfare of Livestock – Sheep makes it clear that it is essential that there is awareness of the welfare needs of sheep present and a capability on the part of the responsible person to safeguard them under all foreseeable circumstances. Unless this can be achieved, flocks should not be increased in size or new units established.
- 5.06 The number of animals involved at the applicant's holding is relatively small (10% of the total flock) requiring the labour input of less than 0.1 of a worker. There is no indication as to why the majority of management tasks, particularly those of a more sensitive nature such as lambing, must necessarily take place at the application site. However, it is axiomatic that some animal shelter is desirable to address emergency or unforeseen circumstances.
- 5.07 There is an in-principle requirement of a general-purpose building to serve the agricultural holding.

Design

- 5.08 The proposed building is of a standard general purpose agricultural design. The portal frame encloses a single open internal space, which divides into three bays. The application drawing suggests one bay with a double doorway in the north-west elevation will function as an equipment storage area, a central bay having a general storage use, and the remaining bay with a double doorway in the south-western gable used for the housing of sheep. The Design and Access Statement accepts, however, that the central bay may also have to be used for sheep housing.
- 5.09 The primary design consideration is ensuring that the appropriate environment is provided for the housing of the sheep. Inadequate design can be a cause of disease and welfare problems. It is particularly important that animals have appropriate amounts of space available to them and that the building is adequately ventilated. The latter requires the free circulation of air above sheep height and the avoidance of draughts at sheep level. This is usually secured in a portal frame building by an open or protected ridge and some form of wind break material below eaves typically space boarding or material fabric. Concrete panel walling prevents draughts and provides protection to the wall from livestock and moving equipment. The proposed building generally achieves these objectives. Furthermore, the building will be sited on a concrete slab which, in association with the wall panels, will facilitate the maintenance of biosecure conditions.

- 5.10 The means of access from both ends of the buildings meets a general safety requirement to provide an alternative escape option should one doorway become unusable for any reason. The doorways also enables access by machines and equipment avoiding the need for manual cleaning activity and handling of materials. However, the low height of the eaves limits the doorways which may place some restriction on the size of equipment which can be used.
- 5.11 The proposed building has a design generally appropriate to the intended uses identified.

Size

- 5.12 The Welfare Code recommends that sheep should not be housed in groups of more than 50. The general space requirements of sheep are 1.2 to 1.4 sq m per animal and 2.0 to 2.2 sq m for ewes with lambs at foot. This does not fully make allowances for individual lambing pens, feeding troughs, and general access. If all ewes and lambs were to be housed simultaneously at the maximum space requirement, the building could with difficulty handle the numbers indicated, but at the expense of storage uses of the central bay. This is, however, an unlikely scenario. The remaining bay could reasonably accommodate the equipment necessary for general grassland management.
- 5.13 The proposed building is not excessive in size for the intended uses identified.

Site

- 5.14 The site of the proposed building is in a field corner adjacent to a non-residential building in the adjoining property. It would form part of a close group of primarily residential buildings. In this respect, the site reflects the general imperative regarding agricultural buildings that they should, where possible, be allied to existing development rather than on isolated sites. The proximity of the proposed building to an associated dwelling and the intended means of access to it have merit in terms of security and surveillance considerations. The non-agricultural siting considerations and the wider design aspects of Policy DC 1 are outside the scope of this appraisal.

Sustainability

- 5.15 As with all agricultural development in the countryside, it is important that it can continue to serve its nominated purpose for a realistic period of time to avoid becoming redundant and potentially giving rise to changes of use or circumstances which would otherwise be unacceptable. This raises considerations of economic and functional sustainability.
- 5.16 It is unusual for agricultural buildings to be tested from an economic perspective. The emphasis is primarily on the functional consideration. However, the statements supporting the application indicate that the relevant agricultural holding is managed in a manner which seeks to generate an income within a recognisable trading structure and continues the applicant's longstanding farming activity.
- 5.17 From a functional perspective, the proposed building has the uses identified. As long as it is associated with the current land resources (ie the 16.7 ha), they are sufficient to justify and sustain those uses.

6. Conclusions

- 6.01 The proposed agricultural building falls within the scope of national and development plan policies which seek to support the development of farming activity and to accommodate its development requirements which must necessarily be met in the countryside.
- 6.02 The need for the development arises from the loss of agricultural buildings in the development of the Little Blakelow Barn Farm site previously in the applicant's ownership, and the absence of any buildings on the residual agricultural holding. This reflects an asset management decision on the part of the applicant without any certainty that alternative provision would be available. RAC takes no view on this aspect of the background.
- 6.03 In the absence of an available building, there is an in-principle requirement for the provision of secure storage of equipment and materials and the safeguarding of animal welfare in association of the stated farming of the land.
- 6.04 The proposed building is of a size and design generally appropriate to its intended use, and its siting in conjunction with an associated residential presence and a group of buildings has merit. RAC takes no view on the non-agricultural siting considerations and the wider design aspects of the development.
- 6.05 The current size of the agricultural holding is such that, if maintained, it can sustain the proposed building from a functional perspective.

A.H. Elliott BA (Hons). MSc

Fellow. British Institute of Agricultural Consultants

Practitioner Member. Institute of Environmental Management and Assessment

Associate. Reading Agricultural Consultants

April 2022