

PLANNING, DESIGN & ACCESS STATEMENT
FOR
FOR THE PROPOSED ERECTION OF AN AGRICULTURAL BUILDING FOR LIVESTOCK
ON LAND AT
OAKLEY'S FARM LTD
LITTLE BLAKELEY LANE FARM
BLAKELEY LANE
DILHORNE,
STOKE-ON-TRENT
ST10 2PT

Prepared by:

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CONTENTS

SECTION ONE – INTRODUCTION	2
SECTION TWO – LOCATION AND DESCRIPTION OF THE FARM	4
SECTION THREE – AMOUNT AND SCALE.....	6
SECTION FOUR – LAYOUT.....	6
SECTION FIVE – LANDSCAPING AND ECOLOGICAL ENHANCEMENT MEASURES	7
SECTION SIX – APPEARANCE.....	8
SECTION SEVEN – ACCESS AND PARKING PROVISION.....	9
SECTION EIGHT – PLANNING POLICY CONSIDERATIONS.....	9
SECTION NINE – RESPONSE TO PLANNING POLICY CONSIDERATIONS AND RESONS FOR THE PREVIOUS REFUSAL TO GRANT PLANNING CONSENT	10
SECTION TEN – CONCLUSION	13

FIGURES

Figure 1- Location plan extract depicting the position of the proposed livestock building in relation to the farmstead and surrounding land.	5
Figure 2- Site plan extract highlighting the proposed livestock building attached to the existing agricultural storage building, earth bund and hardstanding.	7
Figure 3- Proposed agricultural building plans and elevations drawing extract depicting the new building attached to the existing agricultural building	8

SECTION ONE – INTRODUCTION

- 1.1 This report has been produced by Philip Plant of Mid West Planning Ltd. The purpose of the report is to give sufficient background information about the site and to provide details about the requirement for the proposed agricultural livestock building, which is essential for the proper running of the farming operation by the applicant Oakley

Whilock of at Little Blakeley Lane Farm, Blakeley Lane, Dilhorne, Stoke-on-Trent, ST10 2PT.

1.2 Philip Plant holds a Bachelor of Science with Honors Degree in Rural Enterprise and Land Management and is a member of the Royal Institution of Chartered Surveyors. Philip Plant has been employed in the position of Senior Consultant for approximately twenty-five years during which time he has provided rural planning advice to both applicants and to many Local Planning Authorities including Shropshire Council, Stafford Borough Council and South Staffordshire District Council.

1.3 An application for a detached agricultural building was made in May 2025 (ref SMD/2025/0221). The building was to be located to the north of the existing farmstead. This planning application was refused on 3 July for the following reasons:

1. It is not appropriate to grant planning permission under Green Belt policy exemption

for an agricultural building when it has not been demonstrated whether existing buildings on the site could be utilised (subject to necessary consents). The application does not provide specific justification for the need of the building when considering the long planning history of unauthorised developments (which includes the erection of buildings). The application is therefore contrary to policies SS1, SS2 and SS10 of the Staffordshire Moorlands Local Plan and section 13 'Protecting Green Belt land' of the National Planning Policy Framework (NPPF). The NPPF states that 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.' No very special circumstances have been demonstrated.

2. The proposed building would be sited within an open setting of former field land, which would be highly publicly visible from surrounding roads. There would be visual harm to the character and appearance of the area, as well as Green Belt openness harm, arising from the siting, design and appearance of the building, as well as the extent of proposed earthworks (including cut-and-fill) and construction of the large yard area. The landscape, visual impact and openness harm is unacceptable especially given the absence of justification for the building in the context of the pre-existing site buildings. The application is therefore found contrary to policies SS1, SS2, SS10, DC1 and DC3 of the Staffordshire Moorlands Local Plan as well as sections 13 and 15 of the National Planning Policy Framework.

3. Biodiversity Net Gain is a material planning consideration. There is insufficient information to determine whether the Biodiversity Gain Condition is capable of being discharged. The application is therefore contrary to policies NE1 and NE2 of the Staffordshire Moorlands Local Plan, as well as section 15 of the National Planning Policy Framework'.

1.4 This Statement should be read in conjunction with the other documents and plans submitted with this planning application, namely; -

- Code of Recommendations for the Welfare of Livestock – Cattle (Defra Publications)
 - 101860_Oakley_002_PL01 LOCATION PLAN
 - 101860_Oakley_002_PL02_R0_EXISTING SITE PLAN
 - 101860_Oakley_002_PL03_R0_PROPOSED SITE PLAN
 - 101860_Oakley_002_PL04_R0_PROPOSED LANDSCAPING PLAN
 - 101860_Oakley_002_PL05_R0_PROPOSED BUILDING
 - Oakleys Farm Planning Support Letter from Vet
 - Whilock ecological survey July 2025 & BNG Metric
- 1.5 This report has been prepared following discussions with Oakley Whilock, and review of the reasons for refusal for the previous planning application on 3 July. A full response to the reasons for refusal are detailed below.
- 1.6 Mr Whilock purchased the farm from his father's landlord in 2017. He left school, aged 16 to take over the farm and is now 28 years old. The farming business is well established and currently employs 6 full time people, and 8 part time workers, including 3-4 students for work experience from Reece Heath College.

SECTION TWO – LOCATION AND DESCRIPTION OF THE FARM

- 2.1 This planning application for the development of a livestock shed has been submitted by Mid West Planning Ltd. on behalf Mr Oakley Whilock of Oakley Farm Ltd. Oakley Farm Ltd is a family-run farming business based at Little Blakeley Lane Farm.
- 2.2 The application site is on land situated off the A522 Uttoxeter to Fole Road. The site is located approximately 7.4miles northwest of Stoke-on-Trent. Please refer to the location plan submitted for details.
- 2.3 The total land farmed by Oakley Farm Ltd is approximately 22.59 hectares (55 acres) which is farmed as an agricultural unit. All land is laid down to grass for grazing and the production of fodder for the farm animals.
- 2.4 The principal enterprise is a growing herd of water buffalo for meat production. Around two animals per month are slaughtered for sale to the general public and also to the local pub and restaurant trade.
- 2.5 The farm also keeps animals at the farm for corporate and family entertainment purposes. These events are conducted of-site with the animals being transported to venues for the occasion. Animals include reindeer, donkeys, Meercats, camels, and other small animals used in this farm diversification enterprise. Reindeer also produce antlers which are sold to customers.
- Livestock at the farm currently comprises: -

50 Water buffalo (including calves)
12 Reindeer

2 Donkeys
2 Camels

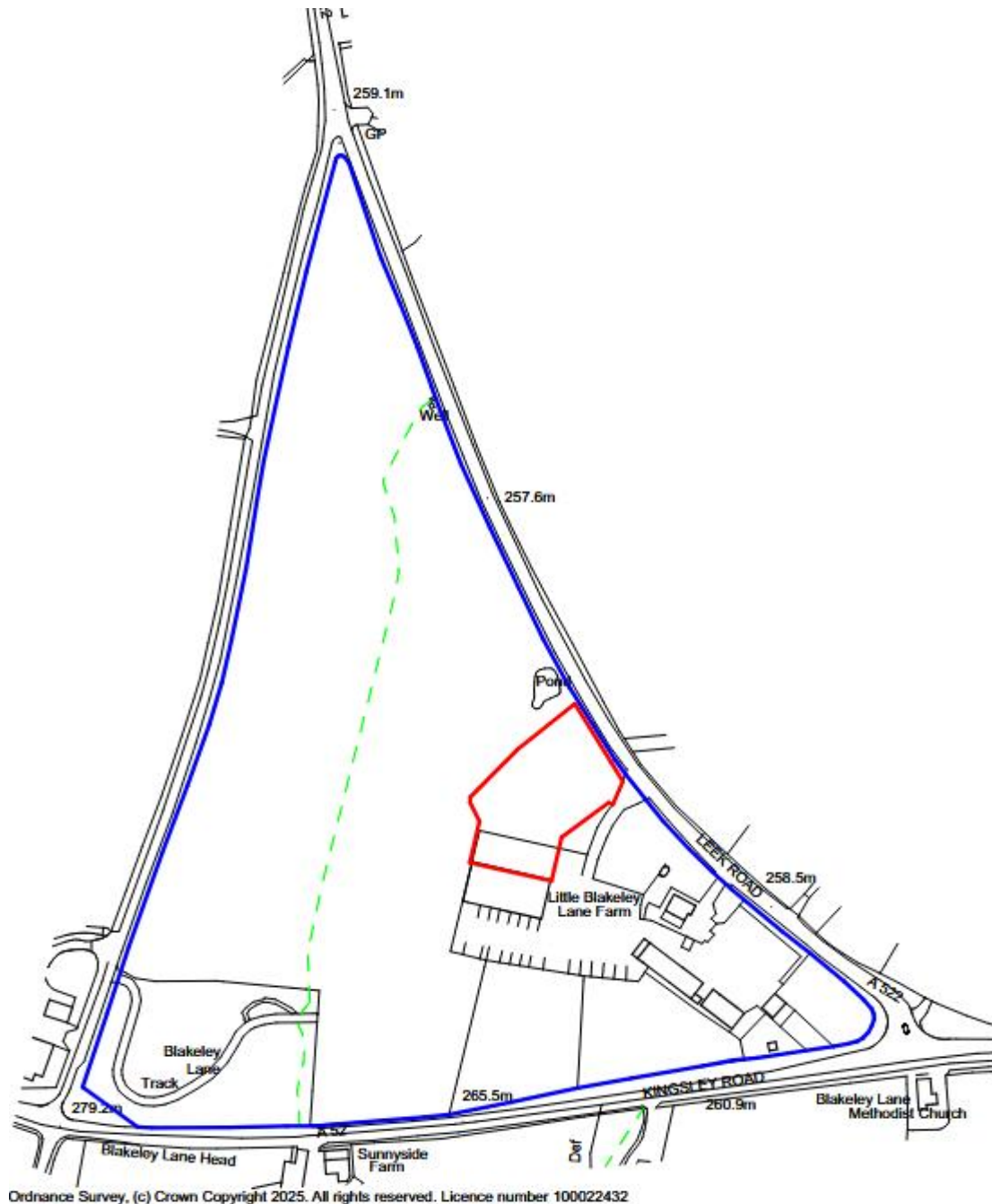


Figure 1- Location plan extract depicting the position of the proposed livestock building in relation to the farmstead and surrounding land.

2.6

The proposed agricultural livestock building will provide accommodation and covered feeding area for livestock. The agricultural building is required to provide secure and safe accommodation primarily for the water buffalo because Mr Whilock has acquired

additional grazing land and can now increase the herd of water buffalo. The existing sheds used for livestock housing are too small to accommodate the growing herd.

- 2.7 The agricultural storage building to the west of the application site is unsuitable for livestock housing because there is no natural ventilation and consequently the buffalo would be susceptible to pneumonia and other respiratory diseases if they were to be accommodated in this building. The storage building has power-floated smooth concrete floor which is very slippery when wet and is therefore unsuitable for housing livestock. The lack of natural ventilation and natural light make the building inappropriate and contrary to animal welfare standards for housing of livestock
- 2.8 This building was designed for and is required for the secure storage of farming machinery, small tools, equipment and animal feed. It is also used for the secure storage of pesticides and fertilisers.

SECTION THREE – AMOUNT AND SCALE

- 3.1 The application is a full planning application for the erection of a covered feeding and gathering area for livestock at Oakley farm primarily in connection with the rearing of water buffalo. The proposed cover will be a steel portal framed construction.
 - 3.2 The site area is 3163m².
 - 3.3 The floor area of the proposed covered area will be approximately 673.5m²
 - 3.4 The height to ridge will be 8.6m.
- Drainage
- 3.5 A comprehensive drainage system will be installed at the site for the purposes of keeping roof water runoff separate from ground water runoff from the yard area that could potentially be contaminated by manure. Roof water will be directed to the pond to the east of the application site which is used as a wallowing pond by the buffalo.

SECTION FOUR – LAYOUT

- 4.1 Plan reference 101860_OAKLEY_002_PL03_R0_PROPOSED SITE PLAN shows the position of the proposed livestock and associated ground working scheme. The revised siting and layout utilises the existing agricultural storage building and seeks to keep the agricultural buildings well grouped together to reduce visual and entertainment impacts from the development.

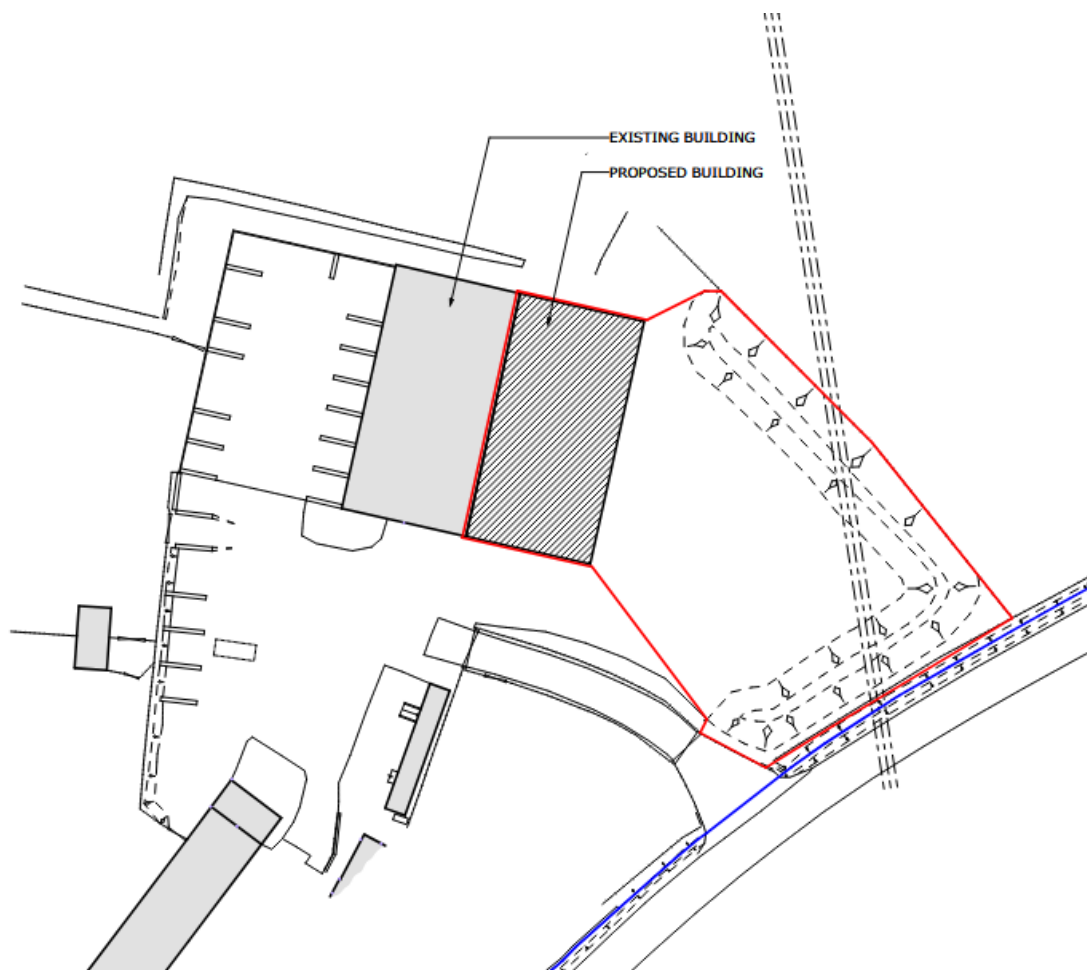


Figure 2- Site plan extract highlighting the proposed livestock building attached to the existing agricultural storage building, earth bund and hardstanding.

SECTION FIVE – LANDSCAPING AND ECOLOGICAL ENHANCEMENT MEASURES

- 5.1 An updated ecological survey has been commissioned by the applicant and is submitted with this application. The Ecological Survey from Nigel Baskerville of Chris Seabridge and Associates details mitigation measures to increase biodiversity on site. The report identifies the application site as 'Overall, the habitat condition assessment of the grassed areas is classified as 'poor' due to low species diversity (<6 species per square metre) and a largely uniform sward structure'.
- 5.2 The mitigation measures proposed in the ecological report are the establishment of 0.1006 ha of neutral grassland on site following the creation of the surrounding soil bunds.

- 5.3 The proposed grassland enhancement will provide Biodiversity Net Gain as required in England, since 12 February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). The Ecology report from Nigel Baskerville of Chris Seabridge and Associates Ltd calculated the Baseline Habitat as 0.25 Habitat Units. The proposed on site biodiversity enhancements including grassland enhancement from (poor condition- good condition) will deliver 0.97 habitat units delivered to create a Biodiversity Net Gain of 34.47% following the development.

SECTION SIX – APPEARANCE

- 6.1 The proposed covered area is a steel portal frame construction with fibre cement roof sheeting with translucent roof lights. The covered area will continue the use of the existing materials at the farm, comprising timber space boarding and precast concrete wall panels to the elevations. The west and east elevations will incorporate galvanised sheeted stock gates and timber space boarding.
- 6.2 The south facing elevation will have a covered feed fence to allow mechanical feeding of the water buffalo.

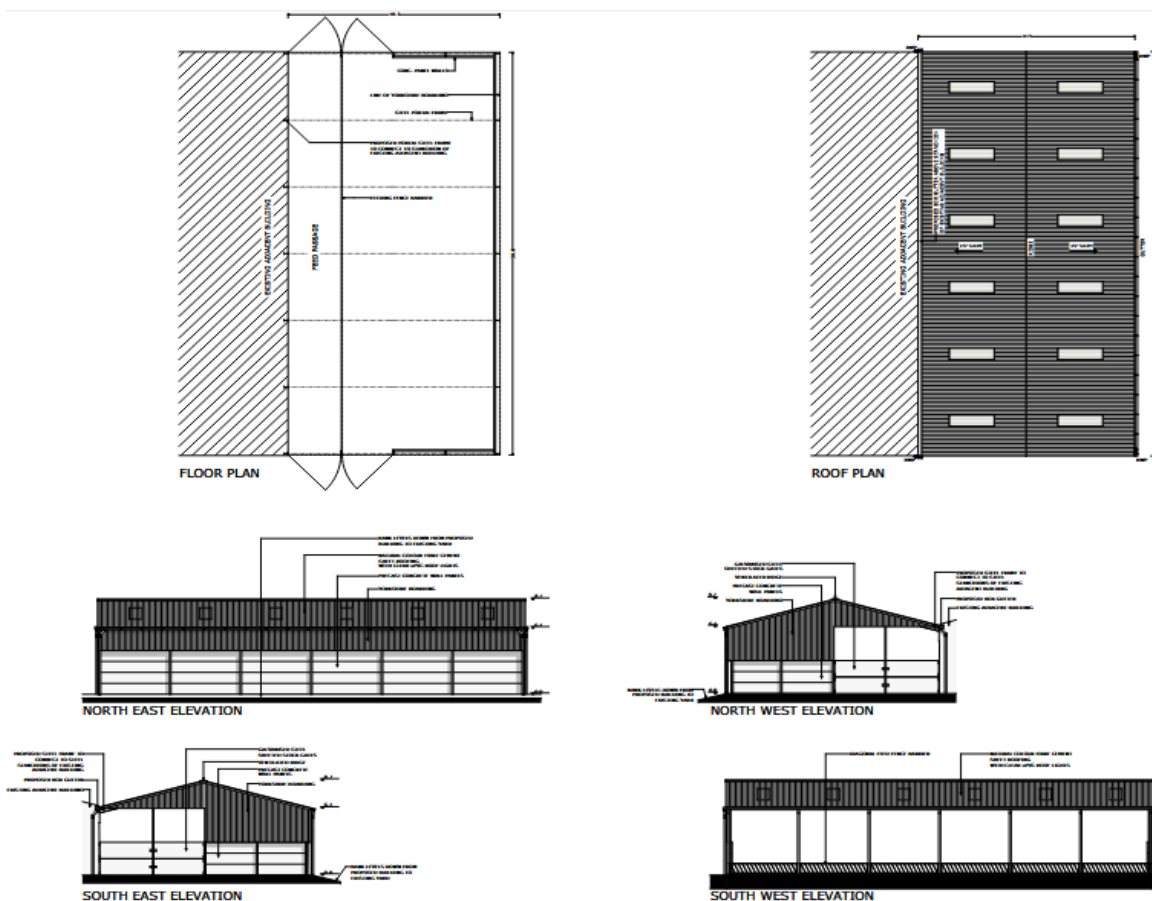


Figure 3-Proposed agricultural building plans and elevations drawing extract depicting the new building attached to the existing agricultural building

SECTION SEVEN – ACCESS AND PARKING PROVISION

- 7.1 The site has a history of vehicle movements, through the use of the site. Access to the site is good and the existing highway access point will continue to be used.
- 7.2 The proposals will not result in additional traffic generation or change to the layout of the access arrangements, and therefore the proposals would not adversely affect highway safety.

SECTION EIGHT – PLANNING POLICY CONSIDERATIONS

National Planning Policy Context

- 8.1 The National Planning Policy Framework (NPPF) was introduced in March 2012 and most recently updated in December 2024 following calls for a less elaborate and forbidding planning system which allows sustainable development to take place.
- 8.2 The main shift in National policy through the introduction of the NPPF in 2012 is the presumption in favour of the granting of planning consent for sustainable development. The 2024 review of the Framework focuses on three particular areas of significant change including the housing need assessment, Green Belt policy and an amended “tilted balance” test.
- 8.3 At chapter 6- Supporting a Prosperous Rural Economy paragraph 88 supports sustainable growth and expansion of rural businesses highlighting that new development should be sensitive to its surroundings, ensuring it does not harm the local character.
- 8.4 Chapter 12 - Achieving Well-Designed Places
Paragraph 135: Development should be visually attractive and sympathetic to local character.
- 8.5 Paragraph 154 outlines exceptions where the construction of new buildings in the Green Belt is not considered inappropriate. These exceptions include:

- a) Buildings for agricultural use

Staffordshire Moorlands Local Plan (2014-2033)

- 8.6 SS1- Development Principles
SS2- Settlement Hierarchy
SS10- Other Rural Areas Area Strategy
DC1- Design Considerations
DC3- Landscape and Settlement Setting
NE1- Biodiversity and Geological Resources
NE2- Trees, Woodland and Hedgerows
T1- Development and Sustainable Transport

SECTION NINE – RESPONSE TO PLANNING POLICY CONSIDERATIONS AND REASONS FOR THE PREVIOUS REFUSAL TO GRANT PLANNING CONSENT

9.1 National planning policy (NPPF) supports this type of development because it is a sustainable development which will benefit the local economy through the provision of employment through the sustainable growth of the existing farming enterprise. The provision of this well-designed new building would be in line with Paragraph 83 'Supporting a prosperous Rural Economy', and with Paragraph 155 (a) of the NPPF.

9.2 The existing livestock buildings at Little Blakely Lane Farm are fully utilised for the accommodation of livestock. The purchase of additional land by the applicant and the subsequent increase in Buffalo herd numbers has necessitated this application for an additional livestock building so that it can be erected in time for the winter when the buffalo are housed in doors for animal welfare grounds. Mr Whilock's vet has written a letter of support for this application outlining the reasons for the new building;

'I am writing in support of a planning application for further buffalo housing at Oakley's Farm, Little Blakeley Lane Farm, Dilhorne, where the currently only have one shed to house the buffalo. They require more space to be able to improve the health and welfare of the herd, for example, allowing them the ability to separate calves at weaning, and to be able to separate the bull away from females and calves to avoid unwanted pregnancies.' Signed by Miss Emam Crust, Farm Clinical Lead Vet.

9.3 This development will help to ensure the on-going long-term viability of the farm and safeguard existing employment levels within the business by the provision of the erection of a livestock shed to provide covered feeding and handling area for livestock to allow the applicants to continue his farming activities within a safe, environmentally secure and efficient and purpose-built covered livestock shed.

9.4 This covered area is unobtrusive in this established farmyard location it will not have an adverse impact on the visual appearance and landscape character of the area. This agricultural building will:

- Make use of land already used to site an agricultural handling yard
- Be very well related to an existing farmstead and group of buildings
- Is essential to the viable agricultural operations on Oakley's Farm
- Protect and respect the natural landscape and the built vernacular
- Be of a high-quality contemporary agricultural design, appropriately designed for the intended purpose of housing buffalo.
- Not be detrimental to the amenity of an area

9.5 The development represents sustainable rural development in line with the guidance set out in the NPPF. The development would be to erect the new livestock building on land already occupied by the existing farmyard. The covered area, is, considered to be acceptable by virtue of being attached to the existing agricultural buildings on the farm and complementary to the existing long-established agricultural operations at Oakley Farm.

- 9.6 The building will be built using contemporary and efficient agricultural building materials. The agricultural building fits in with the built vernacular of typical agricultural buildings in the surrounding area and is built for purpose. The proposed building is attached to the existing agricultural storage building to reduce visual impact from the public vantage points, including the nearby PROW.
- 9.7 In line with modern sustainable farming the proposals include proposals for a sustainable drainage system. Clean surface water will be harvested for agricultural use on the farm, such as water for livestock. The animals will be kept on deep straw bedding to minimise any dirty water discharge from the building.
- 9.8 The proposed agricultural building will not impact too greatly on the landscape or the amenity of the nearest neighbours. The principle of an agricultural building in this location is long established and the use of the building will remain in agriculture. In line with Policy DC3 this development would have no material effect on the appearance and character of the open countryside.
- 9.9 The site is currently served by appropriate highway access.
- 9.10 The proposed covered livestock building will be clad in traditional agricultural building materials to match the existing agricultural storage building. This will minimise the visual impact of the building on the landscape. The steel portal frame structure is typical of agricultural buildings in the surrounding area. The mass, form, scale is respectful of other agricultural development in the vicinity, and it is therefore considered to be compliant with Policy DC1- Design Considerations.

Response to the reasons for refusal

- 9.11 The proposed building will extend the availability of livestock accommodation now that the buffalo herd has expanded. The vet's letter submitted with this planning application confirms why additional livestock accommodation is required on animal health and welfare grounds. The existing agricultural storage building is not designed for animal housing. It has a power-floated floor which is very smooth and slippery when wet. This will impact on animal welfare should buffalo be housed in the building as a result of buffalo slipping and falling over. Slippery floors are one of the most common problems in cattle sheds. They increase the risk of falls and injuries, which can lead to stress and reduced productivity in livestock. Slippery surfaces often occur due to wear and tear in existing grooving or improper floor design, as is the case for the storage building. The storage building is not equipped with an open ridge or space boarding for ventilation.
- 9.12 Paragraph 63 of the submitted Code of Recommendations for the Welfare of Livestock - Cattle states that 'there should be enough room for all the animals in the management group to lie down and move around freely. Where feed and water troughs are accessible from the bedded area, measures should be put in place to reduce fouling. Where feed and water troughs are provided in the adjacent loafing area, the access areas should be sufficiently wide to permit free movement of animals and prevent routes becoming wet, fouled and slippery. Where a loafing area is used it should, ideally, be partly covered. You will need to control the build-up of slurry in passageways and loafing areas by scraping at least twice a day. The design of the

proposed livestock building has good natural ventilation, light and facilities for feeding the buffalo and facilities for craping out manure when required.

- 9.13 The Welfare of Farmed Animals (England) Regulations 2000 (S.I. 2000 No. 1870) regulation 3(3), states that: In deciding whether the conditions under which animals are kept comply with the requirements set out in Schedule 1 of the Regulations, the owner and **keeper of the animals shall have regard to their species, and to their degree of development, adaptation and domestication, and to their physiological and ethological needs in accordance with established experience and scientific knowledge.** The applicant clearly has a statutory and moral duty to ensure that livestock kept at the farm are adequately housed according to their specific needs.
- 9.14 The erection of a new agricultural building is one of the exceptions to the rule that development in the green belt is inappropriate. (NPPF Paragraph 154 (a)). It is therefore not inappropriate development in the green belt and consequently there is no requirement to present very special circumstances as there would be if the development was inappropriate development in the green belt. Notwithstanding this position, the applicant has demonstrated very special circumstances by explaining the unsuitability of the existing agricultural storage building for the accommodation of livestock.
- 9.15 The applicant has relocated the proposed livestock building to be attached to the existing agricultural storage building in light of the second reason for refusing the previous application. The siting of the proposed building is no longer in the 'open setting of the former field land', and is much less visible than the previously proposed building. In terms of the design of the proposed building, it is designed as a utilitarian, functional steel portal framed agricultural building to be used to house livestock. The design and layout of the building is appropriate for loose housing of the farmed buffalo herd. Internal pens can be constructed using gates and barriers. A scraping passage is situated alongside the feed barrier to the western side of the building, adjacent to the storage building.



Ridge ventilation



Yorkshire boarding ventilation

- 9.16 The applicant has provided evidence that the development can deliver the required plus 10 Biodiversity Net Gain (BNG) through the establishment of wildflower rich grass mix and the planting of mixed native species hedging and trees.
- 9.17 Should planning consent be granted, the submission of a Biodiversity Gain Plan before development is begun is required, as it is not exempt from the mandatory Biodiversity Gain Condition. Paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 has the effect that planning permission is deemed to have been granted subject to the "biodiversity gain condition which means that the development should it be granted, must not begin unless:
- a) a Biodiversity Gain Plan has been submitted to the planning authority, and
 - b) the planning authority has approved the plan.

SECTION TEN – CONCLUSION

- 10.1 The development proposed is in accordance with current Central Government Planning guidance and with the Staffordshire Moorlands Local Plan where they relate to agricultural development. In particular, agricultural development is not inappropriate in the green belt.
- 10.2 The applicant has set out the reasons why the proposed livestock building is required, and why the existing agricultural storage building cannot be used to house livestock. Furthermore, the existing agricultural storage building is required to store valuable machinery, equipment, tools, pesticides, fertilisers and animal feed.
- 10.3 The relocated building has much less impact on the landscape and is much less visually intrusive. It is constructed using materials commonly found in the rural environment and designed specifically for livestock accommodation, and therefore it is typical of contemporary agricultural buildings found in rural locations.

- 104 The Ecology report and BNG assessment confirm that the development of the building will not impact protected species or their habitats and will deliver a positive biodiversity gain of 34.47% on completion of the development.
- 10.5 This application for the erection of a purpose built and efficient covered livestock building attached to an existing agricultural farmstead which is essential to house the livestock kept at the farm. The future financial security, and sustainable efficiency of the farming business depends on this development.

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July 2025