

AGRICULTURAL LAND IMPROVEMENT SCHEME

JOHN POINTON & SONS LTD

PLANNING STATEMENT V2

MAY 2026

REFERENCE: 1302/J250151

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1 INTRODUCTION

1.1 This planning statement has been prepared on behalf of John Pointon & Sons Limited and accompanies a full planning application for engineering works for agricultural land improvement at land off Rownall Road, Stoke-on-Trent ST9 0BT.

1.2 The improvement of agricultural land will be accomplished by the movement and deposition of clays soils within the applicant's agricultural holding. The movement and deposition site is indicated on the below snipped plan:

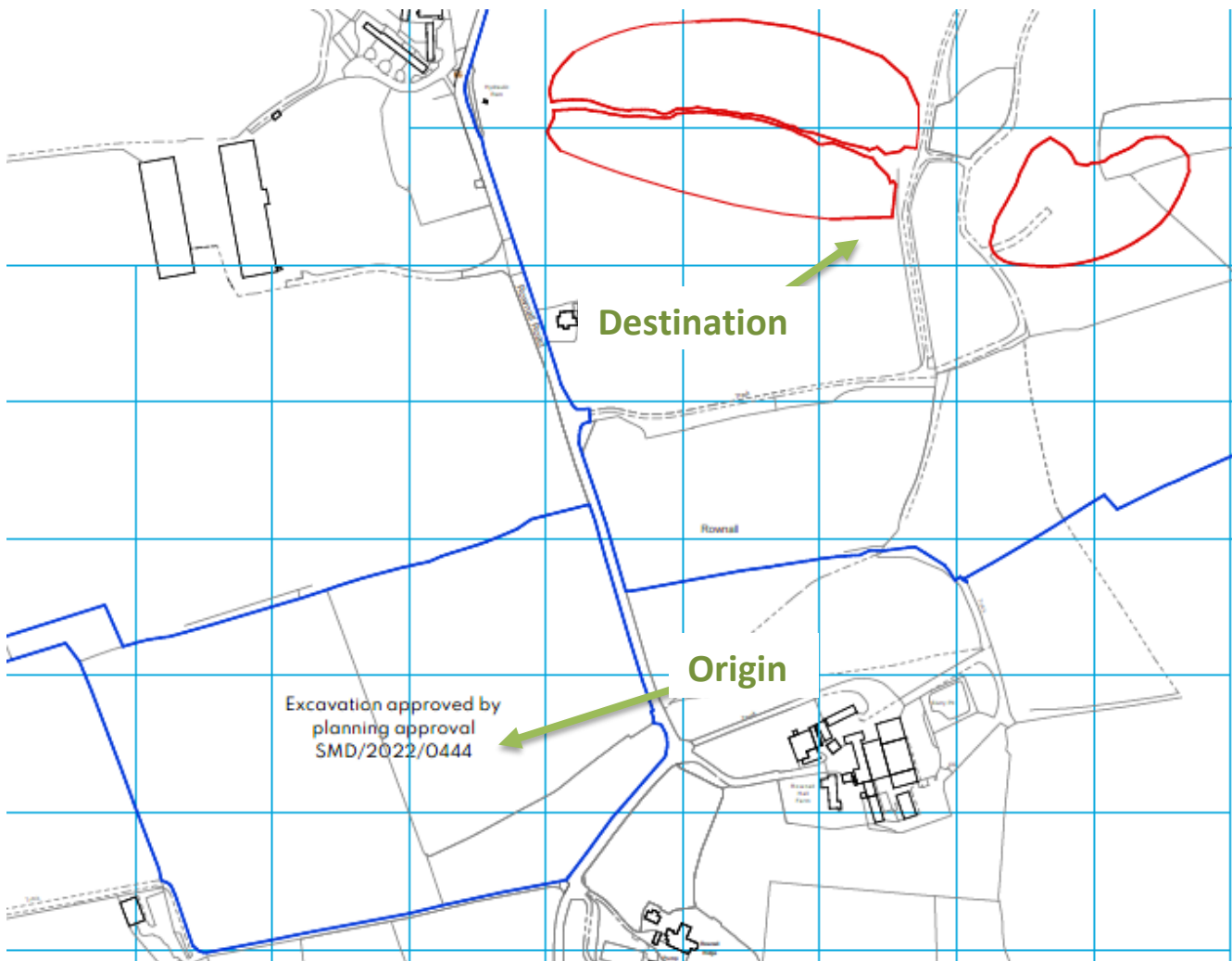


Figure 1: Location plan

1.3 The material will be removed by the applicants from the agricultural land that is in and will remain in their ownership and transport it themselves straight across Rownall Road to their other agricultural land in the same ownership.

1.4 This excavation forms part of works approved under planning permission reference SMD/2022/0444, granted on 22 December 2022 and amended under recently approved application NMA/2024/0027. Consequently, the excavation is not applied for under this application.

1.5 In total, 3,309 m³ of topsoil and 12,350 m³ of CAN soil (15,659 m³ in total) will be taken from this location and deposited within the application site across the road. The material originates from long-established agricultural land which has historically been used for grazing and cropping. As such, there is no reasonable prospect of contamination arising from the soil, given its agricultural provenance and absence of any industrial or commercial processes on the source site. The material will be used to improve the land where it is being deposited. The applicants are keen to undertake this and have planned this for many years as the soil is from virgin agricultural land and has value in its current state without processing or treatment. As such it represents a valuable asset, an economic solution to a pre-existent problem, and an environmental re-use of good soil.

1.6 The material is not being discarded but used permanently to level and improve the potential of an existing agricultural field.

1.7 Given its re-use for a permanent purpose, lack of contamination, and movement within the same agricultural holding, this deposition is applied for as an engineering operation.

2 SITE CONTEXT

2.1 The application site comprises a clough situated within a larger agricultural field. The land is located approximately 350 metres east of Rownall Road, set well back from the highway and screened from public view by the natural topography and intervening hedgerows. This separation, together with the established field boundaries and mature vegetation, ensures that the site is visually recessive within the wider rural landscape.

2.2 The land currently exhibits uneven and degraded ground conditions, with evidence of historic disturbance, localised erosion and poor surface drainage. The valley floor and lower slopes contain exposed stone, patchy vegetation cover and areas of bare or compacted ground, resulting in limited agricultural productivity. The existing sward is inconsistent and dominated in places by rushes and rough grass, reflecting prolonged waterlogging and sub-optimal soil structure.

2.3 A small watercourse runs along the base of the clough, forming part of the site's natural drainage system. The surrounding landform naturally falls towards this watercourse, with surface water currently flowing over uneven ground rather than being effectively managed through the soil profile. Overall, the condition of the land restricts its ability to function as productive agricultural pasture and limits its contribution to the viability of the holding.

2.4 The surrounding area is strongly agricultural in character, consisting of a patchwork of fields enclosed by hedgerows, interspersed with occasional farmsteads and rural dwellings. To the south, the nearest properties include Wayfields Farm and Whitefields Farm, while Millbrook Fisheries lies further to the south-east, with associated ponds and waterbodies forming part of the local landscape. Lodge Farm Equestrian Centre is located further east of the site, reinforcing the predominantly rural and equestrian land uses in the locality.

2.5 To the west of the wider landscape sits the National Grid Cellarhead Substation, a prominent landmark. However, this is separated from the application site by open fields and intervening vegetation, meaning that the substation does not form part of the immediate site setting. Instead, the application site reads as an integral component of the open countryside, with its agricultural function and naturalised boundaries blending into the prevailing character of the area.

2.6 Overall, the site is well contained and screened by the landform and surrounding vegetation, limiting any wider visual influence. The separation from Rownall Road and surrounding residential properties ensures that the site contributes to the sense of openness and rurality, whilst being visually unobtrusive within the wider countryside setting.

3 PROPOSAL

PROPOSED LAND IMPROVEMENT AND AGRICULTURAL ENHANCEMENT

3.1 The proposed works are intended to restore and improve the land so that it can function as productive agricultural pasture, consistent with its rural setting and established agricultural use. The scheme involves re-profiling the ground to create smoother, more coherent landforms that reflect the natural contours of the clough, while retaining its overall character. This will reduce existing erosion risks, improve accessibility for agricultural management, and allow surface water to drain more naturally across the site.

3.2 Following re-profiling, the land will receive an appropriate depth of high-quality topsoil to improve soil structure, fertility and rooting depth. The topsoil will be carefully placed and managed to ensure good soil horizons and to avoid compaction, thereby creating conditions suitable for sustainable grass growth. This will be complemented by targeted drainage measures to address existing waterlogging, allowing excess surface and sub-surface water to be intercepted and conveyed in a controlled manner, rather than pooling within the pasture.

3.3 The land will then be cultivated and reseeded to establish a robust grass sward appropriate for grazing and agricultural management. Ongoing land management practices, including controlled grazing and routine maintenance, will ensure the improved pasture is retained in good condition over the long term. Collectively, these measures will significantly enhance the agricultural productivity of the site, bringing degraded land back into effective use without altering its fundamental rural character.

WATERCOURSE PROTECTION

3.4 The existing watercourse at the base of the clough will be retained in its current alignment and condition. No development, land raising or soil placement will occur within 3 metres of the watercourse, ensuring its function, ecological value and natural drainage role are protected. This buffer will safeguard water quality, allow for continued natural processes, and ensure the proposed land improvement works do not adversely affect the water environment.

4 APPRAISAL

PRINCIPLE

4.1 The application site lies within the Green Belt. Paragraph 154(h)(ii) of the National Planning Policy Framework (2024) allows for engineering operations, such as the deposition and re-grading of soils, provided that the development preserves the openness of the Green Belt and does not conflict with its purposes:

h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

ii. engineering operations;

WHETHER ENGINEERING OPERATIONS

4.2 There is no definition of engineering operations within the NPPF, however, the PPG advises engineering operations are “*groundworks*” which fall within the definition of development in line with Section 55 of the Town and Country Planning Act 1990.

4.3 In practice, the accepted definition lies parallel to the definition of “*building operations*” given at section 55.1A of the Act, in that “*engineering operations*” are works which are normally undertaken by an engineer. Case law (*Fayrewood Fish Farms v SoS and Hampshire CC [1984]*) and its application in a recent appeal (APP/D2320/C/21/3279304) clarifies that:

*“Section 55(1) of the Act sets out the meaning of ‘development’ for the purposes of the Act, which means the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land. It was held in Fayrewood Fish Farms Ltd v Secretary of State for the Environment [1984] that the term engineering operation should be given its ordinary meaning in the English language. It must mean operations of the kind usually undertaken by engineers, i.e., operations calling for the skills of an engineer. This does not mean that an engineer must actually be engaged on the project, simply that it is the kind of operation on which an engineer could be employed, or which would be within his purview. **Engineering operations involve works with some element of pre-planning, which would generally be supervised by a person with engineering knowledge.**”*

4.4 The Inspector of the appeal, then went on to apply this to earthworks, and the role of pre-planning and machinery in engineering works and confirmed that these qualified works as “*engineering operations*”:

*15. I saw that the earthworks that have been carried out at the site are substantial and are likely to have been carried out using machinery. Indeed, the appellant confirmed during the Inquiry that a bulldozer and excavator were used. The mounds have been shaped to create ramps and have been located within the site to form part of a circuit. Where the land is naturally higher than the track, it appears to have been cut away, to create the track. **This would have involved an element of pre-planning. Therefore, as a matter of fact and degree, I consider they constitute an engineering operation and are therefore development for the purposes of the Act.***

4.5 The applicants have pre-planned the transference of this agricultural soil and improvement of this imbalance in their holding since at least March 2021 when they first approached the author to query whether they would need planning permission.

4.6 The clough has limited the potential of their holding for many years, given that it spans at least 9.5 acres and must be given a wide berth in all agricultural operations. Its existence has also created safety concerns regarding the keeping of livestock (particularly cattle) in these fields. The applicant's had been considering their options on improving the land levels for some time.

4.7 The intended construction methods involve 6 tractors and trailers, and the planned operations have been informed by highways and drainage engineers to ensure safe transport, and sustainable earthworks.

4.8 Consequently, in line with the above Inspector's interpretation of case law, these works can be considered "*engineering operations*" and are, therefore, subject to the two tests of openness and purposes of the Green Belt (Paragraph 154(h)(ii)), which are considered below:

OPENNESS

4.9 Openness in Green Belt terms has both a spatial and a visual dimension. From a spatial perspective, the proposed deposition and levelling of soil would not introduce any new buildings, structures, or enclosures. The land would continue to function as an open agricultural field, and there would be no increase in built form or encroachment into undeveloped land. The proposals are confined entirely within the established field parcel. As such, the spatial openness of the Green Belt would be wholly preserved. From a visual perspective, the proposals are designed to produce a landform that is coherent with the surrounding countryside.

4.10 The effect on public views is also limited. The site lies off Rownall Road, screened by hedgerows and local landform. As such, views from the public highway and surrounding vantage points would remain of open countryside in agricultural use. The proposals do not involve boundary

treatments, fencing, or engineered structures that might compromise the rural character. The perception of openness would, therefore, be preserved from all relevant viewpoints.

4.11 Overall, the proposal is considered to preserve both the spatial and visual dimensions of openness. It avoids the introduction of built form, does not encroach into the wider countryside, and delivers a landform that assimilates naturally with its surroundings. In compliance with paragraph 154(h)(ii) of the NPPF, the openness of the Green Belt will be safeguarded, and the character and function of the landscape will be maintained in full.

PURPOSES OF THE GREEN BELT

4.12 Paragraph 143 of the NPPF sets out the five purposes of Green Belt designation. The proposal does not result in urban sprawl (Purpose A), does not contribute to the merging of towns (Purpose B), and does not encroach into the countryside (Purpose C). The use of the land remains agricultural in character, form, and function. Nor does the development impact the setting of historic towns or undermine urban regeneration (Purposes D and E). Accordingly, the proposal does not conflict with the purposes of including land within the Green Belt.

4.13 Consequently, these works can be considered appropriate within the Green Belt as per the listed NPPF exceptions, and not harmful to the Green Belt. By passing these two tests, the development is also appropriate within the open countryside and therefore compliant with Local Plan Policy SS 2.

POLICY SS 1: DEVELOPMENT PRINCIPLES

4.14 Local Plan Policy SS 1: Development Principles expects development to *“contribute positively to the social, economic and environmental improvement of the Staffordshire Moorlands”*. The proposal satisfies SS1 because the works will maintain the established agricultural use of the land and improve its long-term productivity. No new buildings, infrastructure, lighting or hardstanding development will be introduced, meaning the character, tranquillity and environmental qualities of the countryside will remain fully preserved.

4.15 Furthermore, the wider site is an active agricultural holding which is limited in its full potential by a steep clough running through the centre of the holding. By increasing the potential and improving the land through the efficient reuse of high-quality agricultural soil from elsewhere in the agricultural holding, both the land will be improved and the yield and viability of the agricultural enterprise itself. Successful agricultural enterprise is integral to well-maintained pastoral landscapes, as such this development does not represent a threat to the landscape but rather its continued preservation as an open field.

4.16 Additionally, the works do not generate additional traffic, place demands on local services, or require new utilities. They constitute a small-scale rural operation that sits comfortably within the principles of managed development in the countryside. The improvement of agricultural land directly furthers rural economic productivity, a core objective of Policy SS1.

4.17 Elsewhere in the policy, the council pledges support for development which *“secures high quality, sustainable environments, efficient and effective use of resources and contribute effectively to tackling climate change and reduced carbon emissions”*. The applicants are seeking to avoid the waste of non-contaminated virgin agricultural soil in one field by reusing it in another. This is both the efficient use of a valuable resource, and by moving it a short distance as opposed allowing the soil from BESS site to be transported away elsewhere, the proposal represents perhaps the most environmentally sensitive use of this material.

4.18 As such, the development is supported by Policy SS 1, and DC 1 which encourages *“sustainable construction techniques”*.

POLICY SS10 – OTHER RURAL AREAS STRATEGY

4.19 Local Plan Policy SS 10 states that only development which has *“an essential need to be located in the countryside, supports the rural diversification and sustainability of the rural areas, promote sustainable tourism or enhances the countryside”* will be supported.

4.20 The compliance with this policy should hopefully require no explanation; it can only be carried out on site and contributes to the long-term viability of rural areas both directly and indirectly. The availability of the material provides a valuable and unique opportunity for the enhancement of the productive capacity of the farm. Through the use of a substantial volume of a high value material that is available on the same holding.

4.21 The proposal accords with SS10 because it directly supports agriculture, one of the key rural economic sectors recognised in the Local Plan. The net benefit of this development as both a land improvement project, the increase of the potential of the field, and the efficient use of this soil ensures that this has value to the applicants and the agricultural holding and should therefore be supported in line with the council’s support for the rural economy.

4.22 The works will restore the field to a condition in which it can be farmed more effectively, securing the optimal use of agricultural land. The land will remain entirely in open countryside use and will continue to contribute to the functioning of the wider holding.

4.23 As the works simply enhance the efficiency of an existing agricultural field without altering its role, identity or relationship to the surrounding landscape, the proposal conforms with the overarching aim of Policy SS10.

CHURNET VALLEY AND DESIGN

4.24 Local Plan Policy SS 11 Churnet Valley Strategy asks developments to carefully consider the landscape character within the Churnet Valley and seeks to ensure that locally distinctive qualities and sense of place are restored, strengthened, and enhanced. The application site is inherently rural and agricultural in appearance. The application does not represent any change to this and functionally would improve the agricultural performance of this piece of land.

4.25 A Landscape Statement is submitted with the application which confirms that the landscape effects are minor, and the proposed mitigations are appropriate. The deposition of soil will produce a smoother but natural land profile which ties in seamlessly with adjacent fields. The final topography will mirror the established agricultural pattern and avoid any artificial features that could appear visually intrusive. The proposed works do not alter boundary vegetation, existing field patterns or the established rural landscape structure.

4.26 Although the development involves no buildings, structures or engineered features, Policy DC1 is also relevant in relation to landform and landscape integration. The deposition and grading of soil will produce a smooth and natural land profile that ties in seamlessly with adjacent fields. The final topography mirrors the established agricultural pattern and avoids any artificial features that could appear visually intrusive.

4.27 Once deposited, the soil will be sown and managed as productive land. Consequently, in the long term, a complete restoration of the landscape is considered possible, and all temporary landscaping impacts are therefore considered negligible. Furthermore, this management of the land and development is supported by Policy DC 1 which encourages “*functional*” developments.

4.28 Consequently, this application seeks to enhance the agricultural quality of the land, ensuring it stays pastoral and useful to farmers in the long term via sympathetic and low impact works. As such, this development can be considered compliant with Policy SS 11, DC 1, and DC 3.

NPPF 2024 – SECTION 2: ACHIEVING SUSTAINABLE DEVELOPMENT

4.29 Section 2 of the NPPF establishes the national presumption in favour of sustainable development, defined across economic, social and environmental dimensions. The proposal will enhance agricultural productivity, a recognised component of economic and environmental sustainability:

ECONOMIC OBJECTIVE: The development will enhance the operational efficiency and productivity of agricultural land. Levelling the field reduces waterlogging, improves drainage, and enables the use of modern agricultural machinery, thereby supporting the economic resilience of the rural holding. In turn, this contributes to the wider rural economy, in line with paragraph 8(a) of the NPPF.

SOCIAL OBJECTIVE: By sustaining agricultural activity, the proposal will support the long-term availability of locally produced food and maintains the working rural environment, which forms part of the district's social and cultural identity. It will not impose any impacts on neighbouring residents or local services, aligning with paragraph 8(b).

ENVIRONMENTAL OBJECTIVE: The development would preserve landscape character, maintain openness, avoid built development, and result in a landform that is visually and functionally consistent with the natural countryside. The works would improve soil condition by eliminating waterlogged areas and supporting sustainable land management practices, consistent with paragraph 8(c).

4.30 Section 2 of the NPPF therefore supports the proposal as an example of sustainable rural land management that meets all three objectives.

5 BENEFITS OF DEVELOPMENT

5.1 As established in earlier sections, the works are wholly agricultural. The development is fundamentally an agricultural improvement project, delivering clear and measurable enhancements to the land's productivity, drainage, and operational efficiency.

5.2 The levelling works will materially improve the land's agricultural functionality and have a real-life impact and value to the agricultural holding. The improved condition of the land strengthens the efficiency and resilience of the holding through:

- a) more effective grazing
- b) safer and easier pasture management
- c) increased productive capacity

5.3 The works accord with DEFRA guidance on sustainable soil and land management, which promotes improved drainage and reduced compaction. The development therefore enhances agricultural capability and supports the ongoing productive use of the land.

5.4 These improvements also deliver wider rural economic benefits. A more productive field supports local agricultural supply chains, from contractors to feed and equipment suppliers, and aligns with the Government's objective of fostering a prosperous rural economy, as set out in NPPF paragraph 88.

6 TECHNICAL INPUTS

ECOLOGY AND BIODIVERSITY NET GAIN

6.1 A Preliminary Ecological Appraisal and a Biodiversity Net Gain Assessment, undertaken by Evergreen Ecology, is submitted with the application.

6.2 This development is liable for the 10% increase in biodiversity and as such represents the enhancement of the biodiversity of this site, in line with Local Plan Policy SS 11 Churnet Valley Strategy, Policy DC 1 Design Considerations which promotes the enhancement of biodiversity.

6.3 Since the application was submitted, the deposition amount has reduced by almost half which further minimises ecological impact, however, the works themselves will still alter the land within the redline from the perspective of BNG as the deposition will still be comprehensive. The impact is considered the same, and the proposed level of remediation is considered still appropriate and viable.

6.4 At its heart this development is an improvement of the agricultural land, and the BNG remediation plans reflect that with proposed planting which will be suitable for grazing. Furthermore, the proposed condition allows for the grazing of the site over the required 30 years ensuring the land can be brought into agricultural use quickly, but remediated from a habitat perspective also.

LANDSCAPE

6.5 A Landscape Statement provided by Terrain Landscape Consultants is submitted with the application. Since this assessment, the deposition amount has been reduced, the height of the deposited soil is lower, and the landscape impact reduced. The previous scheme was considered acceptable. The amendments reduce the quantum of change and therefore any residual impacts are only reduced. The submitted Landscape Statement concludes the following with regards to the deposition of 38,775 m³ of soil:

*“Considering the above, including the proposed planting, a full LVA/LVIA process would be likely to record **up to minor landscape effects** and minor/ medium short-term visual effects for affected receptors. The greatest landscape effects are likely to be minor for the existing landform of the site and the host LCT. The greatest visual effects are likely to be up to minor/medium for those in close proximity to the site, including users of PROWs Cheddleton 43 and 18 and residents of Rownall Road to the west and Wood End to the north. **The proposed landscape mitigation is considered appropriate** to local landscape character and likely to provide an appropriate level of mitigation. While the minor effects*

*on landform are likely to be permanent, **all other landscape and visual effects are likely to reduce to negligible following restoration.***

6.6 As such, we can reasonably assert that a smaller deposition amount will result in even more minor effects on landform.

6.7 The development is therefore entirely consistent with Policy DC3 of the Local Plan, which seeks to protect and enhance the district's landscape and settlement setting, and Policy SS 11 Churnet Valley Strategy which asks development to enhance the landscape of the area.

LAND CONTAMINATION

6.8 A detailed Materials Management Plan (MMP) has been prepared already by RSK to specifically planning application SMD/2022/0444, in line with CL:AIRE DOWCOP guidance. The MMP confirms that the soils have been tested and are clean and natural (CAN) soils.

6.9 The submission by RSK also cites that the material being re-used is not waste (as per the Definition of Waste Code of Practice (DoWCoP)) under 'Route B' which covers the re-use of suitable site-won material where contamination is not present or suspected.

6.10 As such, RSK considers the re-use of the CAN soils can be managed under a specific MMP as opposed to a CL:AIRE DoWCoP MMP:

"Due to the fact that clean and natural soils are being re-used at origin, a MMP in line with CL:AIRE DOWCOP is not required for the Cellarhead BESS site and has therefore, not been declared to the Environment Agency."

6.11 Furthermore, under the discharge application the Environment Agency have been approached to confirm their position in relation to the re-use of clean and natural soils, and their response email acknowledges the activities at the site, and they do not object.

DRAINAGE

6.12 No works are proposed to the watercourse, and a 3 m buffer on either side of the watercourse has been identified within which no works will take place to ensure no direct impacts to the watercourse are proposed. Nevertheless, a 2D hydraulic model with a report has been undertaken by WaterCo and is submitted with the application. The submitted model assessed the former scheme parameters, which assumed deposition of 38,775 m³ of soil. Since submission, the proposed deposition volume has reduced to approximately 15,659 m³. The areas of deposition closest to the watercourse (i.e. those controlling potential effects on the watercourse and associated floodplain storage) remain unchanged and therefore the modelled interface with the watercourse is

still valid. The reduction has been achieved by trimming the outer extents of deposition and lowering overall deposition heights, meaning the submitted hydraulic modelling represents a conservative (worse-case) scenario compared with the current proposals. The model illustrates that the extant watercourse and all flood storage (modelled under a 1 in 30-year event) is not impacted by the land improvement works due to the specific placement of the deposition, which does not infringe on the watercourse and will be kept to a minimum of three metres from the watercourse.

6.13 Accordingly, the model demonstrates that no impacts on-site or downstream are presented by the development; given that the current proposal involves a lower deposition volume and reduced outer extents and heights relative to the modelled scenario, the submitted conclusion of no increased flood risk remains unchanged.

HIGHWAYS

6.14 A Construction Traffic Management Plan provided by Eddisons is submitted with the application which details the temporary transport requirements to facilitate this operation.

6.15 The temporary traffic movements required to facilitate the soil deposition will be minimal and short-lived, owing to the highly localised nature of the works and existing infrastructure. Crucially, an existing agricultural farm track already runs from the internal part of the holding toward Rownall Road. This established track will serve as the primary access route for transporting the clay soils from the excavation area to the deposition site.

6.16 To enable safe and efficient movements between the public highway and this farm track, the proposal requires only a very short section of temporary access track connecting the edge of Rownall Road to the existing agricultural track. This temporary connection avoids the need for any new long-term infrastructure or widening of the public highway and significantly reduces construction traffic impacts when compared with alternative access arrangements.

6.17 The below image identifies the access opposite the BESS site, and the route the temporary track will take to the existing access track in the neighbouring field:



Figure 2: Proposed siting of temporary track from highway to agricultural track

6.18 The submitted plans illustrate Rownall Road, the extant farm track, and the short temporary link to be installed. The different colour keys clearly show that the construction access is contained, proportionate, and designed to minimise disturbance to the surrounding highway network and landscape.

6.19 Vehicle movements associated with the proposals will be limited to up to six tractors and trailers transporting soil across the road and along the existing internal farm track. There will be no requirement for HGV imports or exports.

6.20 These movements will take place over a short, defined period of approximately six weeks only. The works will operate in tandem with the existing construction traffic mitigation measures already in place for the approved BESS development on the opposite side of the road.

6.21 To ensure highway safety, trained traffic marshals will be positioned on both sides of the road during soil-transfer operations, controlling construction vehicle movements to manage any interactions with passing traffic.

6.22 The proposed temporary works would cross PRow Cheddleton 43 in two separate places. The submitted CMTTP includes plans showing where these temporary crossings are required, and the

fencing proposed to safely and temporarily divert the PRoW route to move the alignment a safe distance from the works for their duration. Once construction is completed, the PRoW will be returned to its original state without diversion, obstruction, or any change other than a slight increase in ground level which will be unnoticeable in the long term.

6.23 Having regard to the limited scale, duration and nature of the vehicle movements, and the traffic management measures proposed, the works are not considered to give rise to any material harm to highway safety or the free flow of traffic, as set out in the Construction Traffic Management Plan prepared by Eddisons.

AMENITY

6.24 The development does not introduce any new built form, lighting, or intensified uses that could give rise to amenity issues for neighbouring properties. The nearest dwellings are separated from the site by fields and hedgerows, ensuring there are no direct impacts. The proposed works will enhance an agricultural field, the function of which is identical to its historic and ongoing use. Future activity will remain limited to conventional farming practices, meaning the amenity of surrounding occupiers is safeguarded in the long term.

TREES

6.25 A Tree Survey, Arboricultural Impact Assessment and Arboricultural Method Statement were undertaken by Tree Solutions and are submitted with the application.

6.26 The submitted Arboricultural Impact Assessment confirms:

Arboricultural input was sought at the outset, with a detailed tree survey undertaken to identify constraints and inform the design and positioning of the soil deposition areas.

The layout ensures all deposition works are located outside the Root Protection Areas (RPAs) of existing trees, safeguarding their long-term health, structural stability, and contribution to landscape character.

No tree removal or pruning is required to facilitate the works, and no long-term conflicts between the proposal and retained vegetation are anticipated.

Appropriate tree protection measures are included within the accompanying Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) to ensure compliance with best practice throughout implementation.

7 CONCLUSION

7.1 The proposed works comprise a carefully considered and proportionate agricultural land improvement scheme, the primary purpose of which is to restore and enhance the productive capacity of land that is currently limited by poor ground conditions, inconsistent soil structure and ineffective drainage. The proposals are directed towards improving the functional quality of the land so that it can be managed efficiently and sustainably as part of the wider agricultural holding.

7.2 The re-use of uncontaminated clay soils sourced from virgin agricultural land within the same ownership and holding represents an efficient and sustainable use of material, avoiding unnecessary off-site disposal or importation. In combination with re-profiling, topsoil placement and cultivation, the works will create improved soil conditions capable of supporting a healthy, resilient grass sward and long-term agricultural use.

7.3 Overall, the proposals represent a justified and policy-compliant approach to agricultural land management, addressing an existing physical constraint on the holding and delivering a clear improvement in land quality and productivity, while safeguarding the watercourse and maintaining the character of the rural landscape.

7.4 The development fully meets the definition of an engineering operation and satisfies the two statutory tests for acceptability within the Green Belt. It preserves both the spatial and visual openness of the landscape, introduces no buildings or permanent structures, and maintains the rural character and agricultural function of the site. The proposal does not conflict with any of the purposes of Green Belt designation and is therefore supported by relevant national policy, and by numerous Local Plan policies.

7.5 The accompanying technical assessments confirm that the scheme will not result in adverse impacts on ecology, arboriculture, landscape character, drainage, or the local highway network. Landscape effects are minor and capable of full restoration, biodiversity will be enhanced, and no harm will arise to existing trees or public views. The works ensure the continued viability and diversification of the rural economy, increase agricultural productivity, and support the stewardship of high-quality pastoral landscapes.

7.6 Overall, the proposal represents a positive, sustainable, and beneficial form of development. It secures the effective and permanent use of valuable resources, enhances the agricultural resilience of the holding, and aligns fully with the development plan when read as a whole. For these reasons, it is respectfully requested that planning permission be granted.