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# Planning, Design & Access Statement

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Relocation and erection of Farm Buildings  
Pool Farm, Haresfield, Stroud  
Prepared on behalf of Haresfield Farms

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## 1. Introduction

- 1.1. This Planning Statement has been prepared by Savills on behalf of our client, Haresfield Farms, hereafter referred to as 'the Applicant'.
- 1.2. It supports a full planning application submitted to Stroud District Council for a the relocation and erection of farm buildings, including supporting infrastructure and landscaping on approximately 1.85 hectares of land at Pool Farm, Haresfield ('the Site'). The extent of the Site is edged in red on the plan at [Appendix 1](#).

### **The Planning Application Submission**

- 1.3. This Statement draws upon the findings of various technical information and should be read in conjunction with the accompanying application material to provide a comprehensive understanding of the proposal and its associated benefits.
- 1.4. In addition to this Planning Statement, the following documentation is submitted with the planning application:
- Site Location Plan prepared by TH White
  - Proposed Block Plan prepared by TH White
  - Existing and proposed floorplans and elevations prepared by TH White
  - Proposed site sections/ elevations prepared by TH White
  - Flood Risk Assessment prepared by Clive Onions
  - Heritage Statement prepared by Savills
  - Preliminary Ecological Appraisal prepared by BGS Ecology
  - Transport Statement (including visibility splays and swept path analysis) prepared by Peter Evans Partnership

### **Planning Statement Structure**

- 1.5. The remainder of this Statement is set out as follows:
- Section 2 describes the Site and its surroundings;
  - Section 3 summarises the scheme proposals and includes the Design & Access Statement;
  - Section 4 considers the prevailing Development Plan context within which the planning application should be considered
  - Section 5 identifies all other material considerations, including the Council's emerging Development Brief for the Site;
  - Section 6 sets out the planning balance and assesses the scheme proposal against the Development Plan, having regard to other relevant material considerations; and
  - Section 7 concludes the case for granting planning permission.

## 2. Site Context

### The Site and its Surroundings

- 2.1. The site lies immediately adjacent to the southern side of existing farm buildings at Pool Farm. It comprises an open, broadly level area of land which is partially finished to hardstanding associated with the existing farm, with the remainder of the site containing arable crop relating to the wider land use to the south and east.
- 2.2. Pool Farm, a working farm specialising in the production of high value arable crops and straw, comprises a range of modern and traditional farm buildings. The principal building, Pool Farmhouse, is Grade II Listed and is located to the western side of the complex. Its principal architectural elevation faces north west and addressed Haresfield Lane and the M5. Adjacent and to the south of Pool Farmhouse is a range of redundant traditional farm buildings extending between one and two stories. These buildings benefit from prior approval for the change of use from agricultural to residential. Attached to the southern elevation of that building is an open sided fertiliser store which will need to be removed to facilitate the change of use to the redundant traditional farm buildings. To the west of these buildings, close to Pool Lane, is modern, yet redundant, grain store which is two storeys and rectilinear in form.
- 2.3. Two large modern grain stores exist to the east of the farm complex, and there are a number of smaller, single storey structures located between these buildings and the more traditional farm buildings to the west.
- 2.4. The existing farm buildings at Pool Farm are located to the north of the site and comprise (broadly from east to west):
  - a) two modern grain stores,
  - b) a farm office/store,
  - c) a range of traditional farm buildings (a former dairy, which now benefits from prior approval for the creation of three dwellings),
  - d) a fertiliser store,
  - e) a redundant grain store, and,
  - f) the principal farmhouse: Pool Farm House which is Grade II Listed.
- 2.5. A small copse is located to the north of the existing farm buildings, adjacent to which is a small pond.

- 2.6. Land to the north of the farm comprises an open-air caravan storage site which was granted planning permission (ref:S.19/0087/FUL) in May 2019. This business, established by Haresfield Farms, previously made temporary use of some of the farm buildings at Colethrop Farm; itself, being located on the opposing side of the M5 to the north. The use of the buildings at Colethrop Farm has to be relinquished in order to enable the delivery residential development associated with Hunts Grove. However, the success of that business is significant, and the latent demand for caravan storage was such that full planning permission was secured for the creation of the permanent facility immediately to the north of Pool Farm, consistent with Stroud Local Plan policies focussing on farm diversification and support for tourism.
- 2.7. Mayflower House, a Grade II Listed dwelling, is located adjacent to the west boundary of the site. With exception to this property, all of the immediate land surrounding Pool Farm is within the applicant's control. This includes the open agricultural land to the south and west, which is used for the purposes of producing arable crops.
- 2.8. The surrounding environment is predominantly agricultural. However, there are number of elements of infrastructure that have a significant influence on the landscape character in the immediate locality, including: the railway line to the east; M5 to the north; and, Javelin Park EfW incinerator to the west. There are also significant employment buildings at Gloucester 13 and St. Modwen Park Gloucester, both of which are located to the west of the site.

### **Statutory and Non-Statutory Designations**

- 2.9. The Site lies outside of a defined settlement boundary and therefore falls within the 'open countryside'.
- 2.10. The Site is not subject to any specific environmental designations such as Special Protection Area (SPA), Area of Outstanding Natural Beauty (AONB) or Site of Special Scientific Interest (SSSI), nor does it form part of the Green Belt. The north western boundary of the Cotswold AONB follows the alignment of the Colethrop Lane, which links the hamlets of Haresfield and Colethrop, and is some 1.2 kilometres to the south east of the application site.
- 2.11. In flood risk terms, the Site is located within Flood Zone 1, having the lowest probability of flooding. A Flood Risk Assessment accompanies this application and sets out the proposed drainage strategy for the Site.

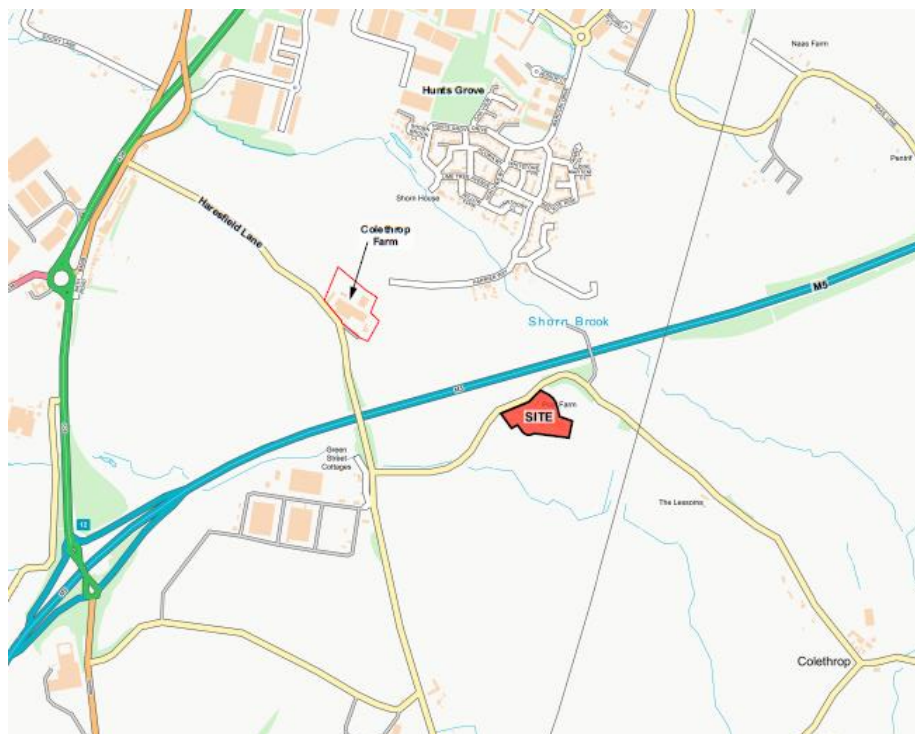
### **Planning History**

- 2.12. The proposals primarily involve the relocation of the existing farm buildings at Colethrop Farm to Pool Farm. There are a number of interrelated planning matters between both of these farm sites which are material in the context of this planning application. These are briefly summarised below:

### Colethrop Farm and Pool Farm

- 2.13. Colethrop Farm, located circa 500m to the north west of Pool Farm, and is on the opposing side of the M5 to the application site. It is situated immediately to the south east of Haresfield Lane. It was historically used as a dairy farm. However, the land associated with Colethrop Farm forms part of the strategic housing allocation at Hunts Grove<sup>1</sup>, and since the grant of outline planning permission for mixed-use residential lead redevelopment in 2008, traditional farming practices have reduced overtime and have now cease on this farm unit altogether.
- 2.14. More recently, temporary planning permission (ref: S.162021/AGR) was secured in June 2016 for the use of the farm buildings as a caravan store for a period of three years: that consent expired on 31<sup>st</sup> July 2019.
- 2.15. As referred to in paragraph 2.7, the caravan storage business proved successful. However, as a result of having to relinquish the use of the buildings to make way for residential development associated with Hunts Grove, planning permission was sought and obtained for the relocation of the caravan store to an open air facility to the north of Pool Farm.

**Figure 2: Colethrop Farm and Pool Farm**



<sup>1</sup> Hunts Grove is allocated for up to 1,750 dwellings in Core Policy CP2 and with the potential for an additional 750 dwellings as per Site Allocations Policy SA4 , the 'Hunts Grove Extension'.

- 2.16. Indeed, such is the success of the caravan store that a separate planning application is made at the same time as this submission which seeks an extension to the caravan store. The preparation of this application has given due consideration to those proposals. The schemes benefit from the adoption of a comprehensive planning approach to some technical matters: for example, the proposed surface water drainage solution.

### Pool Farm

- 2.17. In terms of Pool Farm, Prior Approval for the change of use of the traditional red brick farm buildings to the west of the site was given on 14<sup>th</sup> October 2020 (LPA reference: S.20/1729/P3Q) for the creation of three dwellings. A Building Certificate has been obtained and works associated with that permission intend to proceed in Spring 2021. Recognising that Pool Farmhouse is situated to the front western portion of the site, the approval of the prior notification application, in effect, creates a distinct residential core to west of Pool Farm complex. It is the applicant's aspiration to physically separate the residential elements from the core agricultural operations related to Pool Farm. However, it is acknowledged that both uses at Pool Farm will remain functionally linked by virtue of the fact that the farm manager, who is responsible for overseeing farm operations across the wider holding, lives in Pool Farmhouse.

### **Pre-Application Engagement**

- 2.18. Formal pre-application advice (LPA reference: 2020/0618/PREMIT) was sought from Stroud District Council. A copy of the pre-application response is included at **Appendix 2** and the key points arising from the discussions with officers can be summarised as follows:

- In the context of creating a distinct 'residential zone' to the west of the Pool Farm complex, it was deemed by officers that it would be beneficial for the works associated with the permitted residential units secured via Class Q to have commenced (at the time of submitting the planning application for new farm buildings), so that there was some reassurance that their conversion to a residential use would be completed. This would also assist with demonstrating that the floor space relating to those buildings to be converted was no longer viable to be used in support of the existing agricultural business.
- The application needs to provide sufficient justification to prove that the siting of the buildings is necessary for the continued maintenance of a sustainable farming enterprise. This information could include financials, crop yields etc, which prove that the agricultural business is viable and that the additional floor space is required to support it. The fact that the operation of Colethrop Farm will be hindered by the Hunts Grove development is a key factor in putting the proposal forward and is a material consideration.
- The Council's conservation specialist has not raised any major concerns in regard to concerns with the impact of the development on the significance of heritage assets at this stage, given the existing agricultural nature of the site in question. However, given the proximity of the proposal to two Grade II listed buildings, a detailed heritage statement should be provided with the application, which demonstrates that no unacceptable harm will arise to their settings.
- Although a considerable amount of footprint will be added to Pool Farm, the new buildings will be sat within the existing cluster of agricultural buildings to the south east of the historic barn and on

land which is already hard surfaced. Due to this it would be difficult for the Council to argue that the setting of the buildings would constitute an excessive encroachment into the open countryside, particularly given their typical agricultural appearance and siting within an existing working farm.

- The scheme could be supported if robust information is provided which satisfies the relevant Local Plan policies.

### Summary

2.20 The proposals principally involve the rationalisation of the farming enterprises associated with the applicant's wider land holdings. The need to relinquish the land and buildings at Colethrop Farm to assist with the delivery of residential development at Hunts Grove necessitates the requirement to sustainably re-use the farm buildings from Colethrop Farm at an appropriate location elsewhere within the applicant's ownership.

2.21 The relocation of the farm buildings at Pool Farm has two principle benefits:

Functional: The applicant employs a farm manager to oversee farming operations at across the holding. The farm manager lives at Pool Farmhouse. Having one centralised location from which to manage matters will ensure that Haresfield Farms is able to maintain its functional role as an established and sustainable agricultural enterprise.

Operational: A comprehensive approach to site selection has been undertaken. There are limited opportunities elsewhere within the applicant's ownership to integrate the proposed buildings with existing farm buildings. The benefit of this approach is twofold: a) farming matters can be oversee in a comprehensive and efficient manner; and, b) the development can sensitively integrate with its surroundings.

2.22 The proposals also have been the subject of pre-application discussions which outlined officer's support for the development in principle.



## 3. The Proposed Development (including Design and Access Statement)

3.1. The planning application is made in full and principally comprises the relocation of farm buildings from Colethrop Farm and erected at Pool Farm. The proposals include the reconfiguration of existing farm buildings to enable an enhanced vehicular access in to the complex. The development will include the enlargement of the forecourt and the installation of a weighbridge for farm use. The combination of farm buildings from two complexes in to one will also see the farm office operations relocated to the heart of the expanded agricultural enterprise at Pool Farm. The proposals include a landscaping scheme around access road and the boundaries of the site.

3.2. The description of development proposed is as follows:

*'Relocation, reconfiguration and erection of new farm buildings to include the creation of a new farm office, grain stores, agricultural deadstock building and workshop. Alterations to existing vehicular access road and forecourt, the installation of a weighbridge and associated landscaping and drainage'.*

### **Design and Access Statement**

#### **Use, Amount, Layout, Scale and Design**

3.3. The proposed buildings comprise the relocation of a number of farm buildings to supplement the existing agricultural enterprise at Pool Farm. The proposed buildings include:

- Creation of a new farm office
- A grain store (adapted from a general purpose farm building)
- Machinery and general purpose stores
- Straw, fertiliser and seed store
- Weighbridge office

3.4. The proposed farm and weighbridge offices will utilise the existing single storey buildings to the west of the complex. The farm office will become the focus from which the management of the 700 arable acres currently under the ownership of Haresfield Farms will occur. A new weighbridge office and weighbridge for farm use (manufacturers details of the weighbridge are included with this submission) will be located on the proposed new access road at the point of entering the courtyard for the farm.

- 3.5. The remainder of the proposed farm buildings, which are comparable in size to the existing grain stores to the north of the site, are located around the south and east of the existing buildings on site. A machinery store will be located to the north of the existing grain store. An additional built grain store (adapted and extended from one of the Colethrop buildings) with fan houses to the rear will be located to the eastern extent of the proposals enclosing the farmyard. A new hardstanding, tracking beneath the existing overhead lines, will enable large farm vehicles to turn around on site. The materials used in the finish of the buildings will be consistent with those already at Pool Farm.

### **Access and Movement**

- 3.6. The proposals include minor alterations to the existing vehicular access. The internal farm access road will be relocated to the south of the site, enabling the existing access road to solely service the existing and committed residential dwellings at Pool Farm. The south eastern extent includes an extended hard surface which enables farm vehicles to manoeuvre safely within the site so that access and egress in a forward moving gear can be achieved. Swept path analysis for the farm vehicles using the enhanced entrance is provided within the Transport Statement.
- 3.7. The proposals intend to formalise the existing parking arrangement for staff using the complex including the provision of 7 car parking and 2 cycle storage spaces to the north of the proposed farm office. Parking for farm vehicles when not in operation will be in a secure part of the proposed machinery store.

### **Sustainable Drainage**

- 3.8. It is proposed that surface water conveyance and retention would be provided by a combination of piped drainage system, swales and an attenuation. The attenuation ponds (in the southern part of the Site) would be provided to accommodate the greenfield run off rates for a 1 in 100 year rainfall event (including 40% climate change factor). This feature would also control the surface run-off from the existing site which is unregulated before discharging into a drainage ditch to the south. Overall, the proposals are deemed to result in betterment over the existing drainage situation. Full details of the proposed drainage solution are contained within the Flood Risk Assessment and Drainage Strategy prepared by Clive Onions.

### **Landscaping**

- 3.9. The proposals will include enhancement landscape planting along the southern board of the site, particularly where the boundary is shared with Mayflower Lodge. The verges either side of the entrance to the site and the remnant triangle to the immediate east of the residential dwellings will be supplemented with additional landscape planting.

### **Biodiversity**

- 3.10. An extended Phase 1 habitat survey and associated report has been prepared by BSG Ecology and is submitted in support of this application. It identifies that the site is of low ecological value due to the predominance of hardstanding and bare ground. However, the report suggests a series of recommendations including providing enhancements around the parameters of the proposed attenuation pond and along the southern boundary of the access track where the site shares a boarder with Mayflower Lodge.

## 4. The Development Plan

4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 directs Local Planning Authorities to determine planning applications in accordance with the policies of the Development Plan unless material considerations indicate otherwise. Section 38(3) of the Act provides that the Development Plan includes the “*development plan documents (taken as a whole) which have been adopted or approved in relation to that area*”. The adopted statutory Development Plan for Stroud District Council comprises:

- The Stroud Local Plan (adopted November 2015);

4.2. Material considerations also include national policy, which is primarily expressed through the National Planning Policy Framework and national Planning Practice Guidance, the Council’s emerging Development Plan, as well as additional guidance produced by the Council in the form of Supplementary Planning Documents (SPDs). These are considered further at Section 5.

### **The Adopted Development Plan**

#### The Stroud Local Plan

4.3. The Stroud District Local Plan (LP) was adopted in November 2015 to guide development across the District until 2031. It sets out the overarching spatial strategy and housing requirements for the District for the plan period. This section of the report summarises those policies relevant to the proposed development.

4.4. A principal objective (SO2) of the LP is the for development over the plan period to provide a strong, diverse, vibrant local economy that enables balanced economic growth, coupled with enhance job opportunities across the District.

4.5. Core Policy CP15 directly relates to development proposals in and associated with the working countryside. The Policy is split in to two parts: first, the principle of development; and second, if the first step is met, the specific measures that the development should then demonstrate compliance with.

4.6. First, in order to protect the separate identity of settlements and the quality of the countryside (including its built and natural heritage), this Policy requires proposals outside of identified settlement development limits to comply with only one of a series of criteria in order to be acceptable in principle. The only criteria which the development should demonstrate compliance with, therefore, is whether the proposal is “*essential to the maintenance or enhancement of a sustainable farming enterprise within the District*”.

4.7. If the above principle can be met, the Policy requires development to demonstrate that it would:

- i) Not result in an adverse impact on heritage assets and their setting;
- ii) Not lead to excessive encroachment or expansion of development away from the original buildings;

- iii) In the case of proposals to re-uses an existing building or buildings, these are appropriately located and capable and worthy of conversion. Any such conversion will involve a building that positively contributes to an established local character and sense of place. In the case of replacement buildings they must bring about environmental improvement.

4.8. Linked to the principle of development, Policy EI5 provides guidance in relation to farm enterprises and diversification. It expressly states that development which forms part of a farm diversification scheme will be permitted where the proposals can demonstrate the viability of farming through helping to support, rather than replace or prejudice, farming activities on the rest of the farm and promotes the use of farming practices that have a positive impact on the environment. Where this can be achieved, the Policy requires development proposals to comply with the following criteria:

- 1) The proposed development will stimulate new economic activity with a use compatible with its location, which maintains the relative sustainability of a rural area
- 2) Any new buildings are appropriate in scale, form, impact, character and siting to their rural location
- 3) Wherever possible new or replacement buildings should be located within or adjoining an existing group of buildings
- 4) The proposed development will not generate traffic of a type inappropriate for the rural road affected by the proposal, or require improvements or alterations to these roads which would be detrimental to their character.

4.9. Policy CP14 sets out its support for development that is high quality and seeks to protect, conserve and enhance the built and natural environment. The Policy sets out a series of criteria that development should meet in order to comply with, including:

1. Sustainable construction techniques, including facilities for the recycling of water and waste, measures to minimise energy use and maximise renewable energy production
2. No unacceptable levels of air, noise, water, light or soil pollution or exposure to unacceptable risk from existing or potential sources of pollution. Improvements to soil and water quality will be sought through the remediation of land contamination, the provision of SuDS and the inclusion of measures to help waterbodies to meet good ecological status
3. Adequate water supply, foul drainage and sewage capacity to serve the development and satisfactory provision of other utilities, transport and community infrastructure
4. No increased risk of flooding on or off the site, and inclusion of measures to reduce the causes and impacts of flooding as a consequence of that development
5. An appropriate design and appearance, which is respectful of the surroundings, including the local topography, built environment and heritage
6. Re-use of previously developed land and/or the adaptation of existing buildings that make a positive contribution to the character of the site and surroundings, unless demonstrably unviable
7. No unacceptable adverse affect on the amenities of neighbouring occupants
8. Contribute to the retention and enhancement of important landscape & geological features, biodiversity interests (including Our environment and surroundings trees, hedgerows and other natural features)

9. Contribute to a sense of place both in the buildings and spaces themselves and in the way in which they integrate with their surroundings including appropriate landscaping, biodiversity enhancement, open space and amenity space
  10. A design and layout that aims to assist crime prevention and community safety, without compromising other design principles
  11. Efficiency in terms of land use, achieving higher development densities in locations that are more accessible by public transport and other non-car modes and where higher densities are compatible with the character of the area and the setting of the development
  12. It is not prejudicial to the development of a larger area in a comprehensive manner
  13. Safe, convenient and attractive accesses on foot and by cycle and suitable connections with existing footways, bridleway, cycleways, local facilities and public transport
  14. It is at a location that is near to essential services and good transport links to services by means other than motor car.
- 4.10. Policy ES3 requires development proposals to maintaining quality of life within environmental limits. Planning permission will not be granted to any development which would be likely to lead to, or result in an unacceptable level of:
1. Noise, general disturbance, smells, fumes, loss of daylight or sunlight, loss of privacy or an overbearing effect
  2. Environmental pollution to water, land or air and an unacceptable risk to the quality and quantity of a water body or water bodies
  3. Noise sensitive development in locations where it would be subject to unacceptable noise levels
  4. Increased risk of flooding on or off the site, and no inclusion of measures to reduce the causes and impacts of flooding
  5. A detrimental impact on highway safety
  6. An adverse effect on contaminated land where there is a risk to human health or the environment.
- 4.11. Policy ES6 provides guidance on biodiversity and geodiversity.
- 4.12. In accordance with Policy ES12, the District Council will require the layout and design of new development to, among other criteria, create well designed and high quality successful places.
- 4.13. New development should be designed to offer flexibility for future needs and uses taking into account other changes, and it must be based on thorough site appraisal and be sensitive to its context. 'Design Quality', reflecting a thorough understanding of the site context, must be demonstrated as part of any proposal. The Council will require the submission of a Design and Access Statement which clearly demonstrates the design and suitability of the proposal in its local context.

## 5. Other Material Considerations

5.1. Section 70(2) of the Town and Country Planning Act 1990 (as amended) requires that all material considerations are taken into account in decision-making. The following material considerations are relevant to this planning application and are considered in turn below:

- National policy contained within the National Planning Policy Framework ('the Framework') (February 2019).
- Supplementary Planning Documents
- Community Infrastructure Levy (April 2017)
- Emerging Stroud Local Plan Review

### The National Planning Policy Framework

5.2. The revised National Planning Policy Framework ('the Framework') was published in July 2018 and amended in February 2019. The revised Framework set out the Government's policies for the planning system and maintains that a presumption in favour of sustainable development remains at the heart of the Framework (paragraph 10).

5.3. The Framework makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development which has the following mutually supportive and interdependent objectives:

- *"an economic objective – to help build a strong, responsive and competitive economy, **by ensuring that sufficient land of the right types is available in the right places** and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- *a social objective – to support strong, vibrant and healthy communities, **by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;** and*
- *an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."* (para. 8, the Framework) [our emphasis].

5.4. The presumption in favour of sustainable development is set out at paragraph 11. For decision taking, the injunction remains to approve proposals which accord with an up to date Development Plan without delay (para. 11c). Where there are no development plan policies, or those policies most important for

determination the application are out of date, the proposal should be approved unless one of two exceptions applies (para. 11d), these being:

(i) when the policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed (with reference to Footnote 6); or

(ii) when the adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the Framework policies when taken as a whole.

### *“Decision-taking”*

- 5.5. In addition the Framework, at paragraph 38, requires LPAs to *“...approach decisions on proposed development in a positive and creative way”* and *“...seek to approve applications for sustainable development where possible”*.

### *“Building a strong, competitive economy”*

- 5.6. Chapter 6 reaffirms the Government’s commitment to securing economic growth (para. 80), taking into account both local business needs and wider opportunities for development. Planning policies must be *“flexible enough to accommodate needs not anticipated in the plan”* and respond rapidly to economic changes (para. 81d).
- 5.7. Paragraph 82 states that planning policies and decisions should recognise and address the specific locational requirements of different sectors.
- 5.8. Paragraph 83 contains the Government’s approach on supporting the rural economy and ensuring that it remains prosperous. It directs planning policies to enable sustainable growth and expansion of all types of business in rural areas, both through the conversion of existing buildings and well-designed new ones (para.83.a); the development and diversification of agricultural and other land-based rural businesses (para.83.b); and sustainable rural tourism and leisure developments which respect the character of the countryside (para.83.c).
- 5.9. Decisions concerning rural development should recognise that sites to meet local business and community needs in rural areas may not have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings. The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.



*“Making effective use of land”*

- 5.10. Paragraph 117 of the Framework encourages decisions to “...*promote an effective use of land in meeting the need for home and other uses...*”.

*“Achieving well-designed places”*

- 5.11. The Framework recognises that good design is a key aspect of sustainable development, and “*the creation of high quality buildings and places is fundamental to what the planning and development process should achieve*” (para. 124), with further design guidance set out at paragraphs 125 to 132 with decisions requiring developments to be visually attractive as a result of good architecture, layout and appropriate and effective landscaping (para. 127.b); and that is sympathetic to local character and history, including the surrounding built environment and landscape setting (para.127.c).

*“Meeting the challenge of climate change, flooding and coastal change”*

- 5.12. The Framework seeks to avoid inappropriate development in areas at risk of flooding and direct development to areas with the lowest risk of flooding. As the accompanying FRA confirms, the Site lies within flood zone 1, thereby being at the lowest risk of flooding. The application proposal would not give rise to any flooding or drainage capacity issues.

*“Conserving and enhancing the Natural Environment”*

- 5.13. Paragraph 170 requires decision takers to protect and enhance valued landscapes, minimise impacts on biodiversity and provide new opportunities for biodiversity, having regard to mitigation and compensation measures.

*“Conserving and enhancing the Historic Environment”*

- 5.14. Paragraph 189 of the Framework requires applicants to assess the significance of any heritage assets affected by a development proposal. When considering the impact of a proposed development on the significance of a designated heritage asset, paragraph 193 requires great weight to be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 5.15. Where the development would lead to less than substantial harm to the significance of the heritage asset, this harm should be weighed against the public benefits of the proposal (para. 196)

## **Supplementary Planning Documents**

- 5.16. There are no Supplementary Planning Documents relevant to the proposals.

## **The Council's Community Infrastructure Levy (CIL)**

- 5.17. The Council's CIL Charging Schedule was implemented in April 2017 and is charged on new developments in the area. It does not apply to new agricultural development.

## **The Emerging Development Plan**

- 5.18. The Stroud Local Plan is presently undergoing review. However, it is only at an early stage in the plan making process and therefore draft policies in the emerging Local Plan are deemed to carry limited weight. Accordingly, the development is not therefore assessed against policies in the emerging Local Plan.

## 6. The Planning Assessment

- 6.1. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 provides that all decisions must be determined in accordance with the Development Plan, when taken as a whole, unless other material considerations indicate otherwise. Section 39 of the Act requires decision makers to exercise their functions with the objective of contributing to the achievement of sustainable development. The Development Plan is described at Section 4 of this Statement. Further material considerations exist in the form of the Framework and the Council's supplementary planning guidance, as described at Section 5.
- 6.2. This Section of the Statement identifies the adopted planning policy framework applicable to the proposed development. This section assesses the proposals compliance with the policy context, and the acceptability of the application detail. It covers the following matters:
- Compliance with to the Development Plan
  - Assessing Impact
  - Benefits of the Proposed Development
  - The Overall Planning Balance.

### **Compliance with the Development Plan**

- 6.3. The Development Plan is up-to-date in respect of Policies that are relevant to the determination of planning applications for rural based development. In this regard, proposals are required to demonstrate that they are essential to maintain on-going agricultural operations in line with Policy CP15 of the Local Plan.

### Essential Need

- 6.4. There are several practical drivers which inform the development proposals. The farmed area currently amounts to some 700 acres of combinable arable crops. Management and grain storage are concentrated on Pool Farm utilising the same buildings as when the Colethrop Farm building complex was operational. The operational buildings at Pool Farm currently comprise two modern grain stores, an outdated grain store and ancillary buildings, as well as the farm house which accommodates some farm management offices.
- 6.5. The proposed application allows a reorganisation of existing farm buildings to address inefficiencies and to provide additional grain storage; thus avoiding 'forced selling' at harvest. It will also allow the applicant to store and market straw at the most advantageous time of the year i.e. between November and the following April as opposed to selling 'off the field'.
- 6.6. There is a requirement to relinquish the land and buildings associated with Colethrop Farm to facilitate the delivery of Phase 4 of the Hunts Grove strategic residential allocation. Notwithstanding, the applicant's agricultural activities still generates the requirement for the similar cumulative footprint of buildings that exist at Colethrop Farm and Pool Farms. There has been an interim period (the last two+ years) where the

applicant has not had the ability to use the buildings at Colethrop Farm for agricultural purposes. This has necessitated the storing of crops off farm, early marketing and selling straw 'off the field'.

- 6.7. The improved storage proposals mean that grain and straw can be marketed and despatched in response to market rather than storage factors.
- 6.8. The lack of storage means that straw is sold off-field. The effect of providing storage is that the straw would be moved to Pool Farm then sold based on market conditions. Storing crop in stable conditions rather than off field means greater control over the value for onward sale. The proposed development therefore fundamentally assists with maintaining the core farming practices within the applicant's holding, in particular, the drying, conditioning and storage of high value crops.
- 6.9. Furthermore, the applicant employs a farm manager who oversees the day to day management of the whole agricultural holding. The farm manager's primary residence is Pool Farmhouse. Rationalising the farm buildings in to one location, including bringing together the central office function associated with the farming operations, will enable the agricultural matters to be comprehensively managed from one location rather than from disparate centres dispersed across the applicant's holding. It is therefore entirely appropriate that the proposed farm buildings are located to the existing nucleus of buildings at Pool Farm rather than an alternative site within the applicant's holding.
- 6.10. The proposals are essential for the on-going maintenance of a well-established and sustainable farming enterprise, and are compliant with the principles enshrined in Policies CP15 and EI5(1) of the Local Plan.

### Design, Layout and relationship with Heritage Assets

- 6.11. Careful consideration has been given to the site and its surroundings in designing an appropriate layout and location of the proposed buildings. The proposals ensure that the buildings address a central forecourt and their backs act as a screen in which to contain general activities associated with the working farm.
- 6.12. The proposed development, comprising the relocation of buildings (which already exist in the nearby landscape, is of a similar scale, form and character to the existing modern agricultural buildings at Pool Farm. The buildings will be read in the context of an existing working farm and they are, therefore, appropriate to the rural location in terms of their design aesthetic, and functional and operational use.
- 6.13. It is material to note that prior approval for the conversion of the traditional farm buildings (a former dairy), located to the front (western side) of the site, from agricultural to three residential dwellings was secured in October 2020. The works associated with the implementation of that approval are due to commence in spring 2021 and are anticipated to be completed by spring 2022. These dwellings, along with Pool Farmhouse, will form a distinct residential character at the western part of the site.
- 6.14. The agricultural buildings and working farmyard will be located behind and to the east of the residential core at Pool Farm. Rather than both uses of the site sharing the same existing access and egress arrangement, the proposals intended to reroute the agricultural access to the south of the complex between

the residential buildings at Pool Farm and the neighbouring Grade II Listed Mayflower Lodge. The proposals include a modest spur road leading off of the new access which separates the residential and agricultural uses.

- 6.15. The realignment of the road necessitates the removal of the former modern redundant grain store. This building, whilst last in use for agricultural purposes and entirely appropriate to its wider landscape context, is dominant and overbearing on the adjacent Grade II Listed Mayflower Lodge. Its removal will enhance the setting of that building. Further, additional landscape planting is proposed along the southern edge of the proposed access road, and it will provide a further improvement to the setting of Mayflower Lodge. As a consequence, the main bulk of proposed buildings will shift eastwards beyond the existing farm buildings, providing relief to the setting of both Mayflower Lodge and Pool Farmhouse.

### Access and Highways

- 6.16. The agricultural activities that would occur within the proposed buildings are the same as those on the existing farm i.e. principally the storage and drying of arable crop, with provision for secure machinery storage. It is anticipated that there would be no material change in vehicular movements associated with agricultural operations at this enterprise.
- 6.17. The proposals therefore comply with the requirements of Policies CP15 (i,ii&iii) and EI5(2,3&4) of the Local Plan.

### Flood Risk and Drainage

- 6.18. The proposals are supported by a flood risk assessment and a comprehensive drainage strategy. The FRA sets out the fact that the existing farm buildings do not benefit from a formal drainage arrangement. The proposals include the provision of an attenuation pond which is designed to a sufficient size to accommodate surface water run-off from the proposed farm buildings and the caravan store to the north of Pool Farm. Overall, the drainage scheme would result in run off rates from the site which are controlled at a slower rate than the existing arrangement, demonstrating betterment.
- 6.19. The earth works arising from the creation of the attenuation pond will be redistributed and shaped in to a landscape bund around the caravan store.

### Landscape Considerations

- 6.20. The proposals include the provision of additional landscaping along the southern boundary of the proposed access road, providing an enhanced setting for the adjacent Grade II Listed Mayflower Lodge.

### Biodiversity

- 6.21. A Preliminary Ecological Appraisal prepared by BSG confirms that the land to which the proposals relates is primarily hardstanding and bare ground and has limited ecological value. It recognises the presence of the pond to the north of the farm buildings in Pool Farm. eDNA testing of that feature confirmed that the pond is not host to newts. Furthermore, the existing agricultural land, which is topped regularly, provides limited habitat for protected species.
- 6.22. The grain store that is to be removed to facilitate the new access to the enterprise is not identified as being suitable as a habitat for bats and, again, is of limited value.

### **Benefits of the Proposed Development**

- 6.23. The above assessment of impacts has shown that no significant adverse effects are expected as a result of the development and that the proposals overall would accord with the provisions of the Development Plan, in addition to material considerations in the form of the Framework.
- 6.24. The benefits of the proposed development are considered to be wide-ranging and significant, supporting and delivering the objectives of the Local Plan/ Framework. These are summarised below within the context of the three aspects to sustainable development as set out within the Framework.

### Economic Benefits:

- The proposals would enable high value arable crops (milling wheat, barely, oilseed rape and beans) and straw to be stored in purpose built buildings. The benefit of having these buildings is that crop can be stored in optimum conditions for prolonged periods allows the business to manage times at which the arable crops are sold; thus enabling the enterprise to achieve its optimum output from the land and to be economically sustainable.
- The provision of farm offices at Pool Farm will result in 2 full time equivalent employees and 3 part time employees: therefore 1.5 net additional direct FTE jobs will be created as a result of the development when it is operational. This will allow the majority of the business administration, accounting and management roles to be done 'in house'; thus limiting expenditure on out sourcing professionals.
- There will be indirect economic benefits associated with the construction of the development as well as the food production including ongoing trade with agricultural merchants, machinery suppliers, builders, plumbers, electricians and other trades.

### Social Benefits:

- The delivery of the proposed farm buildings to meet the needs of the present and future farming generations will help to safeguard the immediate rural enterprise in a sector that continues to play an important role in Stroud District's economy.

- The growth of local sustainable crops is beneficial for the UK food and livestock markets (the majority of milling wheat grown is sold on contract to Shipton Mill at Tetbury which is a nationally renowned manufacturer of traditional flour).
- The proposal includes cycle parking provision as a means to encourage staff employed by Haresfield Farms to use alternative means of transport. Further, the relocation of the farming practices to Pool Farm where the farm manager resides reduces the need to travel.

### Environmental Benefits:

- The Site and its immediate surroundings are not subject to any specific environmental designations such as Special Protection Area (SPA), Area of Outstanding Natural Beauty (AONB) or Site of Special Scientific Interest (SSSI), nor does the Site form part of the Green Belt.
- The Site is not located within an area of Flood Risk, being within Flood Zone 1.
- The proposals comprise the sustainable re-use of existing buildings from Colethrop Farm.
- The retention, protection and enhancement of vegetation on site and along Site boundaries will not only improve landscaping of the site but will also assist with biodiversity and habitat creation.
- The provision of sustainable urban drainage system as a means of mitigating for the Site's impact on local drainage patterns.
- The farmland will be entered into a five year Countryside Stewardship environmental scheme which benefits local flora and fauna. The scheme will be drawn up in conjunction with Natural England.

6.25. The proposals accord with the relevant policies within the Development Plan. Furthermore, in accordance with paragraph 11 of the Framework, the development proposal clearly constitutes 'sustainable development'. Accordingly, it is clear there are significant material considerations which outweigh the statutory presumption in favour of the Development Plan. It is respectfully requested the application is approved without delay.

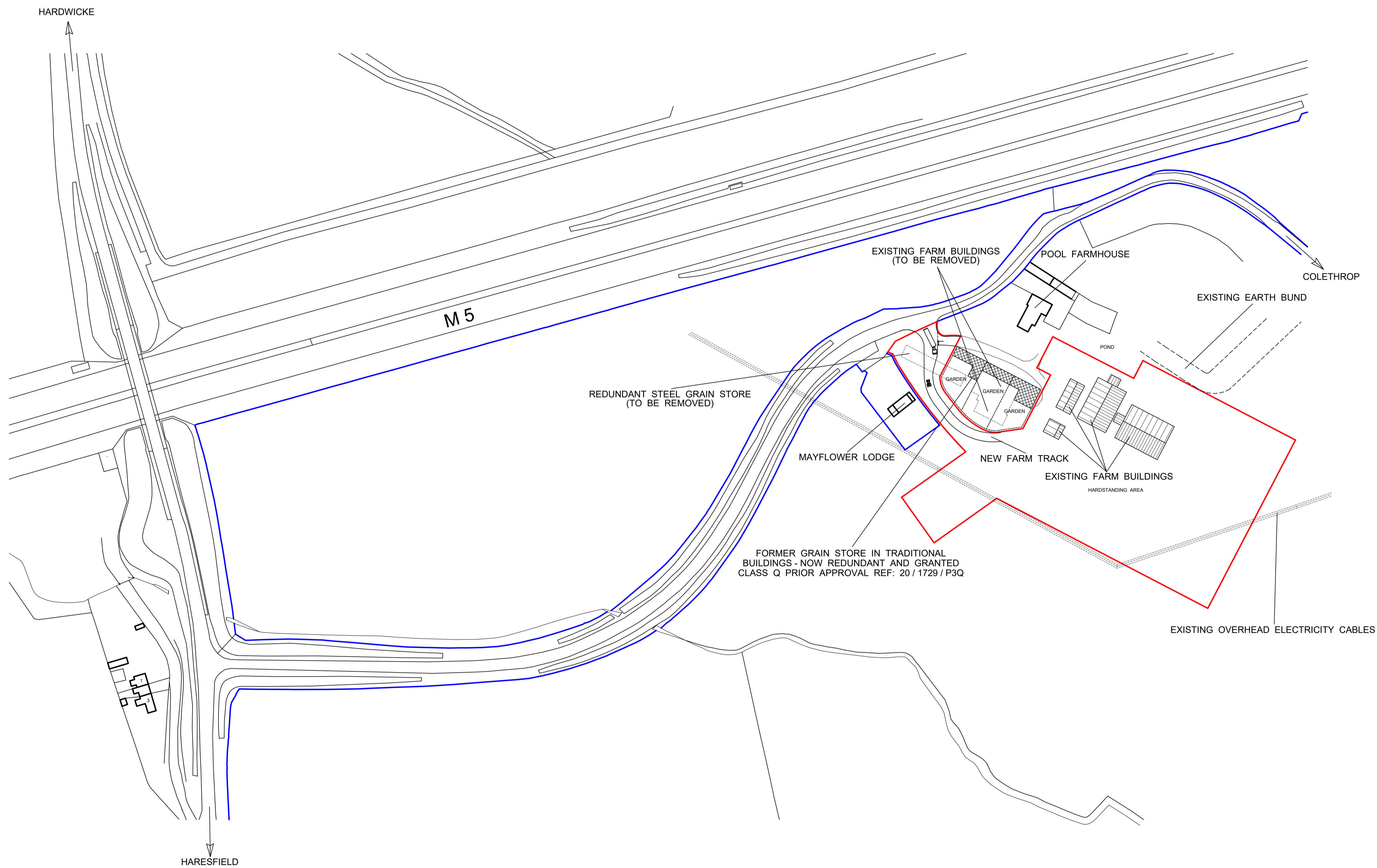
## 7. Summary and Conclusions

- 7.1. This Planning Statement supports a full planning application, submitted to Stroud District Council for additional farm buildings at land to the south of Pool Farm, Haresfield ('the Site'). The development comprises the relocation, reconfiguration and erection of new farm buildings to include the creation of a new farm office, grain stores, agricultural deadstock building and workshop. The development also includes alterations to existing vehicular access road and forecourt, the installation of a weighbridge and associated landscaping and drainage. The proposed development will be accessed/egressed via the existing but an enhanced entrance to the site which connects on to Pool Lane.
- 7.2. The proposals demonstrate that there is an essential need for additional farm buildings which are necessary to support an existing and well-established farming practice. The loss of the farm buildings at Colethrop Farm to the delivery of Phase 4 of the Hunts Grove strategic residential allocation has resulted in a lack of arable crop storage space within the applicant's holding as a whole. Arable crops, including straw, have therefore been cut and sold 'off field' when required by the market. It is pertinent, therefore, that the business has appropriate facilities on site for the storage of arable crops and farm machinery. The proposed development is essential to maintain this sustainable rural business and is compliant with Local Plan Policy CP15.
- 7.3. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the proposed development is in accordance with Policies in the adopted Development Plan. The planning application is supported by a suite of technical reports which demonstrate that the proposals can be delivered without any material adverse effects arising from the development.
- 7.4. As Section 6 explains, there are no technical or environmental impacts that would significantly or demonstrably outweigh the substantial benefits of the proposal. In accordance with paragraph 11 of the Framework, the development proposal clearly constitutes 'sustainable development'. The development is therefore essential to maintain the operational, functional and economic sustainability of this agricultural enterprise and should benefit from the presumption in favour of sustainable development, as set out in the NPPF.





## **Appendix 1 – Site Location Plan**



ISSUE STATUS			
CHANGE CONTROL			
REV	P14	DATE	17/02/21
		REV BY	
DESCRIPTION OF CHANGE FROM LAST REVISION		MINOR AMENDMENTS	
REASON			
REQUESTED BY			

DO NOT SCALE ALL DIMENSIONS ARE IN MILLIMETRES UNLESS OTHERWISE STATED	
<b>TOLERANCES</b> ALL TOLERANCES TO BE TO EN 1090 ANNEX D2 EXECUTION CLASS 2	<b>NOTES (UOS)</b> 1. ALL WELDS 6mm FILLET WELDS UNLESS STATED OTHERWISE 2. ALL STEEL TO BE GRADE S275JR TO BS EN 10025-2 3. ALL BOLTS GREATER THAN 12mm DIAMETER MUST BE STRUCTURAL BOLTS TO ISO 15408
<small>THIS DRAWING IS CONFIDENTIAL AND IS THE EXCLUSIVE PROPERTY OF T H WHITE. NO UNAUTHORISED USE, COPY OR DISCLOSURE OF THIS DRAWING IS TO BE MADE AND IT IS TO BE RETURNED WHENEVER REQUESTED</small>	

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CLIENT	HARESFIELD FARMS
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PROJECT	PROPOSED DEVELOPMENT AT POOL FARM, HARESFIELD
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TITLE	SITE LOCATION PLAN
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SCALE	1 : 1250 (A1)	DRAWN	DJH	DATE	24/08/20
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DRAWING	5808/6	CONTRACT		REV	P14
SHEET	OF	CHECKED	APPROVED		

N





## **Appendix 2 – Stroud District Council Pre-Application Response**



# STROUD DISTRICT COUNCIL

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**Contact:** Tom Fearn  
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**Our Ref:** 2020/0618/PREIMT

24 November 2020

Dear Sir/Madam

**Re: Pool Farm, Haresfield, Stonehouse, Gloucestershire.  
Replacement farm buildings**

I write subsequent to your recent pre-application discussions concerning the above. Having given the matter due consideration I can offer the following advice with regard to your proposals.

### **Relevant Planning Policy Guidance**

Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The adopted Stroud District Local Plan, November 2015 is the development plan for Stroud District. Due weight should be given to policies in this plan according to the degree of consistency with the National Planning Policy Framework (NPPF). The NPPF is a material consideration in planning decisions. The NPPF was published on 27 March 2012.

Full details of the NPPF is available to view at

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf>

For the full content of the Stroud District Local Plan policies above together with the preamble text and associated supplementary planning documents are available to view on the Councils website [http://www.stroud.gov.uk/info/plan\\_strat/newlocalplan/PLAIN\\_TEXT\\_Local%20Plan\\_Adopted\\_November\\_2015.pdf](http://www.stroud.gov.uk/info/plan_strat/newlocalplan/PLAIN_TEXT_Local%20Plan_Adopted_November_2015.pdf)

Local Plan policies considered for this application include:

CP14 - High quality sustainable development  
CP15 - A quality living and working countryside  
ES3 - Maintaining quality of life within environmental limits  
ES6 - Providing for biodiversity and geo-diversity  
ES12 - Better design of places

### **Appraisal**

Following our virtual meeting on the 17th November 2020, I offer the following advice.

The application site consists of Pool Farm, a working farm on the outskirts of the village of Haresfield, accessed via a single carriageway road which links to Haresfield Lane to the west. There is an existing complex of agricultural buildings on the site, including an historic barn to the north of newer steel framed agricultural buildings. The historic barn has been subject of a prior notification for a change of use to residential dwellings, which has been approved but not yet commenced. Both the

original farmhouse and a neighbouring property known as Mayflower Lodge are Grade II listed buildings.

We spoke at length regarding the proposal in question, which involves repurposing numerous agricultural buildings one of which is currently to the rear of the barn to be converted to residential, but the majority will be removed from nearby Colethrop Farm, which is within the same management. This is largely due to the impact of the recently approved Phase 4 of the Hunts Grove development, with a new access road due to run through the site. The aim of the proposal is to consolidate the arable farming operations of both units at one site, so that the farm enterprise is easier to manage. My general view is that it would be of benefit if the Class Q had begun, so that there was some reassurance the conversion to residential would be completed and show that the floorspace of that building was no longer viable to be used to support the business.

As we discussed the primary focus of any application in policy terms will be to satisfy Policy CP15 of the Local Plan, which addresses new development within the open countryside. Criterion 1 of CP15 allows for development in the open countryside where 'it is essential to the maintenance or enhancement of a sustainable farming or forestry enterprise within the District.' The key word here is 'essential' and you will need to provide sufficient justification to prove that the siting of the buildings is necessary for the continued maintenance of a sustainable farming enterprise. This information could include financials, crop yields etc, which prove that the agricultural business is viable and that the additional floor space is required to support it. The fact that the operation of Colethrop Farm will be hindered by the Hunts Grove development is a key factor in putting the proposal forward and is a consideration.

CP15 also states that new development will only be supported where: there is no adverse impact on heritage assets or their setting and it does not lead to excessive encroachment away from the original buildings. I have consulted with the Council's conservation specialist who has not raised any major concerns at this stage, given the existing agricultural nature of the site in question. However, given the proximity of the proposal to two Grade II listed buildings, a detailed heritage statement should be provided with the application, which demonstrates that no unacceptable harm will arise to their settings. Although a considerable amount of footprint will be added to Pool Farm, the new buildings will be sat within the existing cluster of agricultural buildings to the south east of the historic barn and on land which is already hard surfaced. Due to this it would be difficult to argue that the siting of the buildings would constitute an excessive encroachment into the open countryside, particularly given their typical agricultural appearance and siting within an existing working farm.

It is also proposed to widen the existing farm access and provide a new track to the rear of the historic barn in order to further separate the residential cluster to the front of the site, with the working farm elements to the rear. As you are only planning on widening an existing access this should offer greater visibility in and out of the site, but I would still recommend submitting visibility splays on a plan. I did raise a concern that the new access and any increase of vehicular movement could have connotations for the amenity of the future occupiers of the barn, but you stated that broadly, vehicular movements should not increase to a large degree and if this is the case then there should not be a significant increase in harm with regards to noise etc. A new weigh bridge was also mentioned and this should be included on the site/block plans with a manufacturer's specification submitted if it is available.

I do think it is unlikely that there would be major ecological implications of the scheme, given the buildings are largely modern and agricultural, but it would be advisable to conduct a phase 1 walkover as the proposal does propose the complete removal of some buildings, such as the older grain store to the north of the site. Pool Farm is located within an open, rural location and some appropriate ecological mitigation may be deemed necessary as part of the scheme.

In summary, I believe the scheme could be supported if robust information is provided which satisfies the relevant Local Plan policies. With the application please provide: elevations of the buildings in question, existing and proposed site plans for both farms, planning statement with justification, heritage statement, visibility information for the access, phase 1 ecology survey and details of the weigh bridge.

Please note, this advice is based on desk based research only as the case officer has not visited the site as part of this pre application submission. It is possible that further issues could be raised following a site visit, which will be conducted during the planning application process.

As with all planning proposals, should an application be necessary or not it is important that you discuss your proposals openly with neighbours and those directly affected. It is also important that you involve your local town or parish council, many of whom would appreciate you briefing them of your proposals prior to submission.

In closing, may I confirm that the above is the independent opinion of an officer and is not binding on the council, nor does it constitute a formal determination under the Town and Country Planning Act 1990.

Yours sincerely,

Tom Fearn  
Planning Officer