



WREYLAND
RURAL PLANNING CONSULTANTS

PLANNING STATEMENT

Milton Farm, Fairford, Gloucestershire, GL7 4HZ | November 2023

Farm diversification enterprise at Milton Farm comprising a Dog Exercise Field



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1.0 Introduction

- 1.1 This Planning Statement has been compiled in support of an application for Full Planning Permission to change the use of an area of agricultural land at Milton Farm, Fairford to a dog exercise field together with minor operational development required to facilitate the proposal which comprises a farm diversification project.
- 1.2 This Planning Statement will describe the proposal within the wider context of Milton Farm and in particular why the proposal is a response to an identified need to diversify the farm enterprise in order to secure the continuation of the current farming operation. This Planning Statement will also demonstrate the proposed development's concordance with both local and national planning policy as well as other material considerations.
- 1.3 This Planning Statement should be read in conjunction with the submitted plans and noise management plan.

2.0 Milton Farm - Background

- 2.1 Milton Farm is an established mixed farm of approximately 450 hectares located on the north-western edge of Fairford. The farm is principally arable with a beef suckler herd. The farm's general arrangement is outlined in Figure 1 (right) which is principally run by the Applicant from the main yard at Coronation Street, Fairford (outlined in blue in figure 1).
- 2.2 Milton Farm is owned by the Ernest Cook Trust and held under an agricultural tenancy (Agricultural Holdings Act 1986) by the applicant Mr Tom Paton.
- 2.3 The Trust is a large educational charity which is rooted in the conservation and management of the countryside. It plays a significant role in actively encouraging children and young people to learn from the land through hands-on educational opportunities on its estates, and by offering grants. Each year, the Trustees distribute more than £1,250,000 in educational grants to benefit children and young people.
- 2.4 Milton Farm is one of 22 farms owned by the Trust located across England. The Trust comprises approximately 22,500 acres held by 160 tenants (across its commercial, agricultural and other interests).

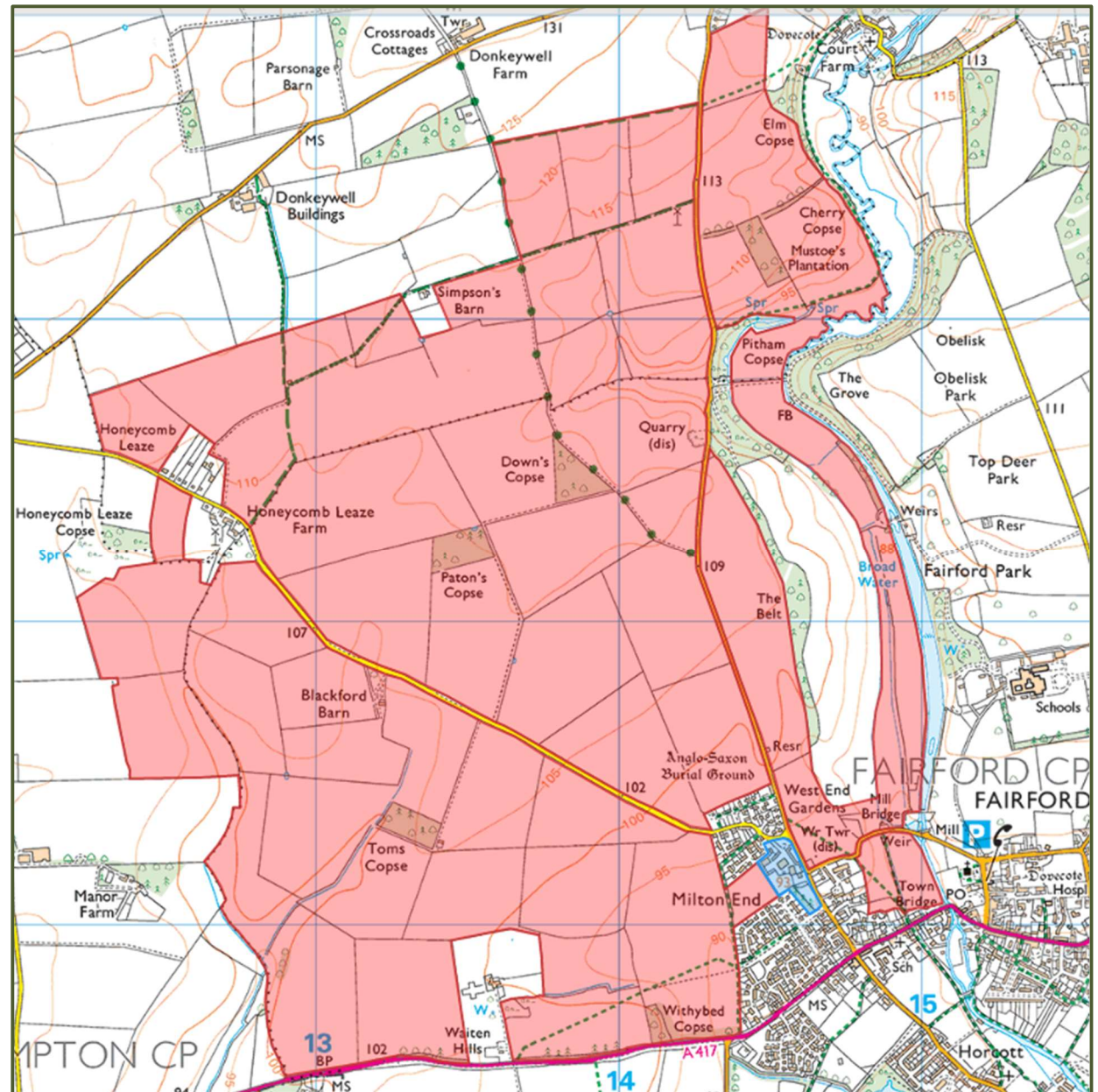


Figure 1 – Extent of Milton Farm identified in red with yard on Coronation Street identified in blue

2.5 Milton Farm has been farmed by the Paton family as tenants of the Trust for over 54 years. In addition to its agricultural enterprises which constitute the farm's principal use, a number of conservation and wildlife projects are also undertaken by the applicant, which are mainly centred around the river meadows which stretch along the River Coln from Fairford to Quenington. The farm remains in a Higher Level Stewardship agreement, co-operates extensively with other farms in the area on environmental issues, and is a Guardian of the Upper Thames on water issues.

2.6 Milton Farm's operations are managed from the yard located adjacent to Coronation Street, and which lies to the north-west of Fairford's centre as identified in blue on the OS plan in Figure 2 (right):

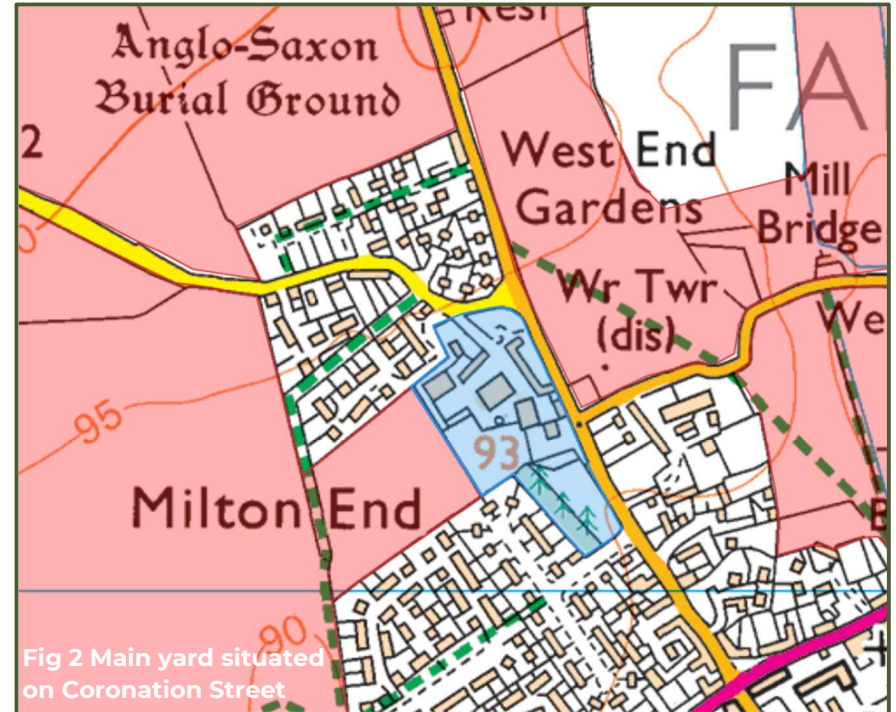
2.7 The farm's livestock housing, buildings, farm office and dwelling are clustered around the yard identified in figure 2. The yard comprises a mix of well maintained traditional farm buildings which are still in agricultural use, together with extensive ranges of 20th century agricultural buildings.

2.8 Milton Farm supports 2 FTE jobs, with additional seasonal support sourced locally when required. The farm runs its arable enterprise on approximately 420ha, comprising a rotation of Winter / Spring Barley and Milling Wheat with Oil Seed Rape / Linseed as a break crop. A further 56ha of ground is pasture.

2.9 In addition to the arable enterprise, a suckler herd of 50 cows with a further 50 calves at foot is also run, with the livestock housed at the yard during the winter months.

2.10 Notwithstanding the farm's demonstrably high standards in terms of farm management and husbandry, volatility in agricultural commodity prices remains a perennial challenge. In addition, the events of the last few years have squeezed agricultural incomes significantly. Britain's exit from the European Union has removed agricultural subsidies, COVID-19 resulted in labour shortages and increased wage bills while the Russian invasion of the Ukraine has resulted in significant increases in farm fuel and fertiliser bills. Since the invasion, farm input and fuel costs have increased by 34%. These increases in costs are a significant concern for farm enterprises, particularly those geared towards larger scale arable production.

2.11 As a result, Milton Farm has identified a **real and immediate need to seek alternative sources of income** to buffer it from further inflationary shocks and to maintain the farm's viability as a predominantly agricultural business going forward.



3.0 Farm diversification at Milton Farm

3.1 In May 2021, Milton Farm submitted notification under Class R, Part 3, Schedule 2 of the General Permitted Development Order for the change of use of the ground floor a traditional agricultural building (>150m²) for use by a small furniture business for the storage, display and restoration of furniture (visitors by appointment only). Identified in figure 3 right.

3.2 On 21st February 2023 Full Permission (22/04276/FUL) was granted to change the use of a range of agricultural buildings to be let for mixed commercial use (B2, B8 and E (excluding retail)).

3.3 The diversified enterprises at Milton Farm will constitute an important diversified income to the farm enterprise, shielding it from future shocks. Notwithstanding this, diversified activities constitute just 17.82% of the yard area and, given that the farm also constitutes 450ha of agricultural land, remain clearly ancillary and subservient to the principal farm enterprise.



Figure 3 – showing site's recent development for farm diversification purposes

4.0 Proposed development

- 4.1 A further opportunity has been identified to diversify and bolster the farm income at Milton Farm through the development of a dog exercise field.
- 4.2 Operational development is limited to the formation of a parking area using Terram overlaid with crushed stone to provide parking for two vehicles with associated turning area.
- 4.3 Surrounding the site will be 1.8m high Tornado Fencing, which is standard livestock netting and therefore not an unfamiliar occurrence in the countryside.
- 4.4 Also to be erected will be a 15.92m² timber field shelter to provide shelter to users during inclement weather. Its appearance will be akin to a standard equestrian field shelter.
- 4.5 It is anticipated that the field will operate during the day from 0700 – 1900 however this will be changed during the winter to use within daylight hours.
- 4.6 Use will be limited to 1 user only at any time who will book a slot via an online system and make payment to the farm business. They will then be provided with an access code for the gate upon their arrival.
- 4.7 Any foul waste will be removed by the users themselves.
- 4.8 In order to mitigate any traffic conflict, sessions of use will be for 50 minutes which will allow a 10 minute turn around between sessions thus eliminating congestion in the access way, parking or access routes.

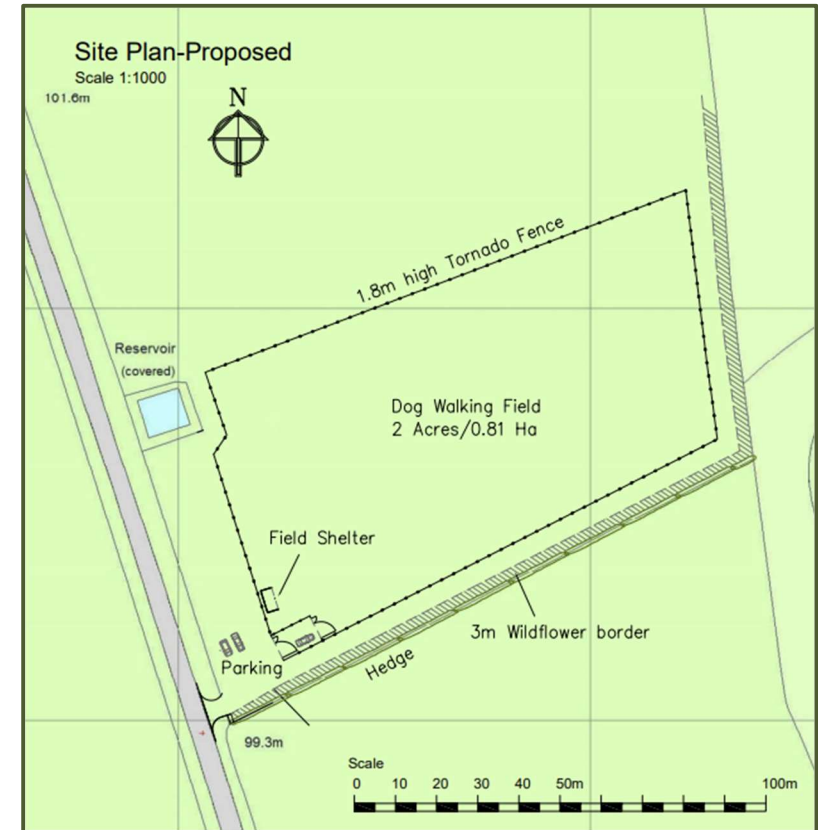


Figure 4 (above) showing proposed site layout

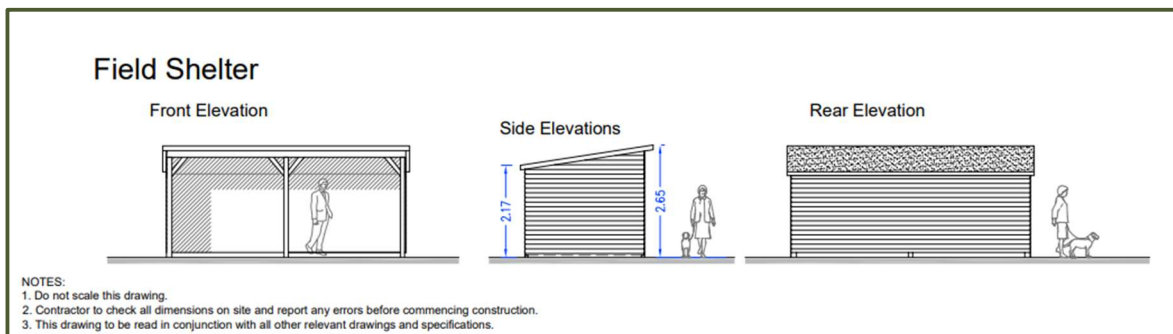
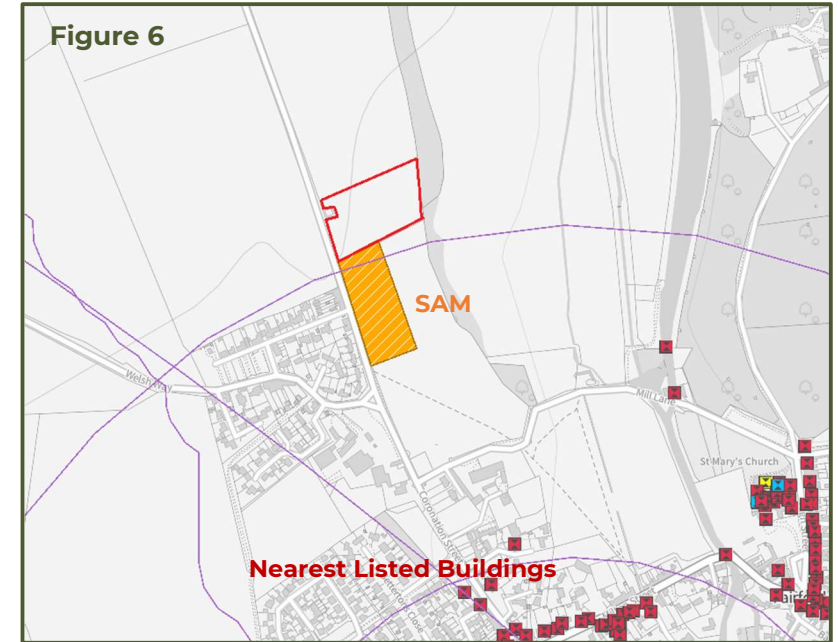


Figure 5 (left) showing proposed field shelter

5.0 Constraints

- 5.1 The yard at Milton Farm is not located within the Cotswolds Area of Outstanding Natural Beauty, nor is it located within any Conservation Area.
- 5.2 The yard is located within Flood Zone 1 (clear) on the Environment Agency's Flood Risk Map for Planning.
- 5.3 In terms of heritage constraints, there are no Listed Buildings within the vicinity of the proposed development.
- 5.4 Waterslade Field is a SAM located in the next field and was excavated in the mid-19th century. This has been considered within the proposal as described below.
- 5.5 The yard is situated adjacent to Fairford's Settlement Boundary. It is also noted that the proposal is within a Special Landscape Area. This is considered further below.



(Clockwise from top right) figure 6 showing local heritage assets, figure 7 showing location of the site adjacent to the settlement boundary and within the SLA, figure 8 showing site within Flood Zone 3 (clear)



6.0 Planning policy considerations

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise. Therefore, in order to assess the acceptability of this proposal, it is necessary to assess it against the adopted development plan.
- 6.2 It is also necessary to consider any material considerations relevant to the development proposal, such as national planning policy contained within the National Planning Policy Framework (NPPF) and the national planning guidance contained within the Planning Practice Guidance (PPG), as well as any locally adopted supplementary planning guidance (SPG) and documents (SPD).
- 6.3 The development plan comprises the Cotswold District Council Local Plan 2011 – 2031 (adopted 3rd August 2018).

POLICY EC1 – EMPLOYMENT DEVELOPMENT

“Employment Development will be permitted where it:

- a) supports the creation of high-quality jobs in professional, technical and knowledge-based sectors and seeks to support economic opportunities which capitalise on the strength of existing academic and training institutions and research organisations;*
- b). maintains and enhances the vitality of the rural economy;*
- c). enables opportunities for more sustainable working practices, including home-working*
- d). supports and improves the vitality and viability of Primary, Key, District and Local Centres; or*
- e). supports sustainable tourism in ways that enables the District to attract higher numbers of longer-stay visitors.”*

- 6.4 As stated above in paragraphs 2.9 and 2.10, this proposal is directly linked to an existing agricultural business which as a result of global economic challenges has identified a need and an opportunity to reduce risk of economic volatility through diversifying its core agricultural business. The purpose of the proposed development is to enable the principal agricultural business to withstand current and future shocks. Accordingly the proposal meets the requirement particularly of criterion b).

POLICY EC5 – RURAL DIVERSIFICATION

“Development that relates to the diversification of an existing farm, agricultural estate, or other land-based rural business will be permitted provided that:

- a. the proposal will not cause conflict with the existing farming operation including severance or disruption to the agricultural holding that would prejudice its continued viable operation;*
- b. existing buildings are reused wherever possible; and*
- c. the scale and design of the development contributes positively to the character and appearance of the area.”*

- 6.5 Milton Farm is a mixed farm enterprise covering 450ha on the north-western edge of Fairford. The farm’s main yard at Coronation Street is extensive and includes a large range of modern and well-maintained traditional farm buildings. The proposed development by contrast represents a small proportion of the farm’s area and will not compromise existing farm viability – indeed, its purpose is to maintain and support its viability. Without the proposed development the farm business in its current guise will be altogether less economically diverse and prone to future volatility thus impacting upon its long-term sustainability.
- 6.6 The proposed development will use an existing field access from Coronation Street. There is also a second entrance further to the north which will be retained in agricultural use. Accordingly there will be no severance or impact upon the farm’s viability.
- 6.7 In terms of the scale and design of the development, the proposal’s operational development is very limited and will remain agricultural in character and will be reversible. Accordingly there will be no divergence away from the existing agricultural appearance of the area. Furthermore the site is situated on the north-western edge of Fairford within the peri-urban fringe and is set against the town as its backdrop. Accordingly the proposal is not isolated within the open countryside and integrates well into the surrounding landscape.

POLICY EC3 – PROPOSALS FOR ALL TYPES OF EMPLOYMENT GENERATING USES

“Outside Development Boundaries, and outside established employment sites, proposals for small-scale employment development appropriate to the rural area will be permitted where they:

- a. do not entail residential use as anything other than ancillary to the business; and b:*
- b. are justified by a business case, demonstrating that the business is viable; or c:*
- c. facilitate the retention or growth of a local employment opportunity.”*

6.8 This proposal makes no provision for residential use and furthermore is clearly undertaken in order to facilitate the retention and growth of an existing employment opportunity being Milton Farm. Accordingly this proposal concords with criterion c.

6.9 It is noteworthy that this proposal is situated adjacent to the Settlement Boundary.

HERITAGE ASSETS

POLICY EN10 – HISTORIC ENVIRONMENT: DESIGNATED HERITAGE ASSETS

- “1. In considering proposals that affect a designated heritage asset or its setting, great weight will be given to the asset’s conservation. The more important the asset, the greater the weight should be.*
- 2. Development proposals that sustain and enhance the character, appearance and significance of designated heritage assets (and their settings), and that put them to viable uses, consistent with their conservation, will be permitted.*
- 3. Proposals that would lead to harm to the significance of a designated heritage asset or its setting will not be permitted, unless a clear and convincing justification of public benefit can be demonstrated to outweigh that harm. Any such assessment will take account, in the balance of material considerations:*
 - the importance of the asset;*
 - the scale of harm; and*
 - the nature and level of the public benefit of the proposal.*

- 6.10 The SAM at Waterslade Field is situated in the adjacent field. There is no nexus between the maximum extents of the SAM and the proposed development.
- 6.11 Notwithstanding this it would be remis not to consider heritage setting and to ensure that there is no harm to the SAM.
- 6.12 Operational development associated with this proposal is limited to three items:
- The erection of a standard livestock fence, which is capable of being undertaken in any case for agricultural purposes. Subsoil works in its erection will be limited to timber fenceposts to a depth of circa 300mm at 3m spacings.
 - The erection of a timber field shelter. This will be free standing and not affixed to the land.
 - The laying of 'Terram' (geocell grid) within the parking area. This is a no-dig parking solution which can be overlaid with crushed stone.
- 6.13 Accordingly even though the proposed development is located in an area away from the SAM, there is no scope for residual harm to any historic fabric through the limited degree operational development required.
- 6.14 In terms of the heritage setting, though the SAM was excavated in the 19th century, its historic importance is below ground. No above ground features are visible. Notwithstanding this it is important to retain the integrity of any remaining below-ground assets together with its open setting for the future. The proposed development is, as stated above, situated in a separate field from the SAM, and furthermore is separate from it physically and visually through the established boundary hedge between the two sites.
- 6.15 Accordingly there will be no harm to setting or integrity of the SAM.

ACCESSIBILITY AND SITE LAYOUT

Policy INF4 HIGHWAY SAFETY

Development will be permitted that:

- a. is well integrated with the existing transport network within and beyond the development itself, avoiding severance of communities as a result of measures to accommodate increased levels of traffic on the highway network;
- b. creates safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoids street clutter and where appropriate establishes home zones;
- c. provides safe and suitable access and includes designs, where appropriate, that incorporate low speeds;

continued below...

d. avoids locations where the cumulative impact of congestion or other undesirable impact on the transport network is likely to remain severe following mitigation; and

e. has regard, where appropriate, to the Manual for Gloucestershire Streets or any guidance produced by the Local Highway Authority that may supersede it.

- 6.16 The proposed site has been chosen for its sustainable location. The site is 1.10km from the centre of Fairford with a significant proportion of the town located considerably closer to the site rendering the site convenient and easily accessible to pedestrians from Fairford via paved and lit footways (though it is important to note that the site will not be used after dark). Furthermore there are two bus stops within 300m of the site on Coronation Street. As a result, the proposal is sustainably located and accessible without users needing to be reliant on the use of private vehicles.
- 6.17 The proposed development will utilise an existing field access. As the field already has two accesses to the highway, agricultural machinery will be directed to the second access to the north ensuring that there will be no conflict between the two uses. The separately submitted plans (MF 4-3 Vision Splays) demonstrate that visibility splays onto the highway (which has a 30mph posted speed limit) can easily achieve greater than the standard 43m Y-distance. The proposal is therefore compliant with the MfS).
- 6.18 The accessway is already laid with stone. This will lead to an area laid with Terram within the site itself. There will be no gate onto the highway so as to allow cars to directly access the site without needing to stop on the highway thus reducing opportunities for conflict with other road users.
- 6.19 Internally, an area has been given for the provision to park two cars together with a suitable turning area to ensure that cars can leave the site in forward gear. Only 1 user may use the site at any one time. Provision for two parking spaces however has been included to mitigate any conflict between users should consecutive users arrive early for their sessions.
- 6.20 Paragraph 111 of the NPPF states that '*Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*' Given that the proposed development would not make a significant difference to these highway related factors, as shown within the transport Technical Note, the scheme is acceptable on highway grounds. The proposal also concords with Policy INF4. Parking provision concords with the requirements of Policy INF5.

Policy EN5 SPECIAL LANDSCAPE AREA

"Development within Special Landscape Areas (as shown on the Policies Map) will be permitted provided it does not have a significant detrimental impact upon the special character and key landscape qualities of the area including its tranquillity."

- 6.21 The level of operational development arising from the proposed development is very limited. Visually the site's appearance will be indiscernible from its current agricultural use or for example an equestrian use – both of which are not considered to be unexpected occurrences within the countryside. This recreational use will enable users, perhaps especially those with 'reactive' dogs, with a facility to quietly enjoy the countryside in a sustainable and secure location. This use is also concordant with the principles of using the countryside in a constructive way. Accordingly the proposed use, together with the limited degree of operational development are not discordant with Policy EN5.
- 6.22 Notwithstanding this, it is acknowledged that certain uses do require an additional element of control to ensure that they remain concordant with acceptable use, particularly in this case with regard to the need to ensure that noise does not prejudice surrounding occupiers and users. Accordingly a Noise Management Plan has been submitted in support of this application together with proposed terms of use.

BIODIVERSITY

- 6.23 Policies EN7 (Tree Hedgerows, Woodlands) and EN8 (Biodiversity and Geodiversity: Features, Habitats and Species) seek to protect natural features, ecology and biodiversity from detriment or fragmentation. This proposal is limited to the use of improved permanent pasture only. No use or operational development will have any impact upon any other natural feature and therefore there will be no conflict with Policies EN7 or EN8.

NATIONAL PLANNING POLICY FRAMEWORK

- 6.23 The National Planning Policy Framework is an important material consideration in the determination of this proposal.
- 6.24 Paragraph 84 supports *"the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings"* together with *"the development and diversification of agricultural and other land-based rural businesses"* as well as *"sustainable rural tourism and leisure developments which respect the character of the countryside;"* and *"the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space..."*
- 6.25 Paragraph 85 states that *"Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements... The use of sites which are physically well-related to existing settlements should be encouraged where suitable opportunities exist."*

7.0 Discussion and conclusion

- 7.1 This proposal seeks to change the use of an area of agricultural land to a dog exercise field as a farm diversification enterprise in support of Milton Farm.
- 7.2 The principle of the change of use is unequivocally supported by the Local Plan with Policy EC5 (farm diversification) being of direct relevance to the application as well as paragraphs 84 and 85 of the NPPF.
- 7.3 Associated operational development has been kept to a minimum and is limited to the erection of stock fencing, a small field shelter similar to that used for equestrian purposes and a small parking area laid with Terram. Accordingly the site's appearance will remain agricultural in nature and concordant with its current setting.
- 7.4 The field is well located being well related to and accessible from Fairford on-foot via a public footpath and lit, paved footways and is also served via two bus stops located in close proximity. Accordingly there will be little need for local residents to rely on private vehicles to access the site where other options are readily available. Where users do elect to arrive by car, provision has been made for a small parking area which benefits from wide visibility splays which will ensure that there will be no detriment to the safety of other highway users.
- 7.5 While the site is well related to Fairford it also located slightly separate from it. Though still being part of the town's form and set against the town as a backdrop, its degree of separation and absence of immediately adjacent neighbours will ensure that there will be no scope of detriment to neighbouring amenity. The low degree of proximity to householders, the maintenance of the mature boundary hedges and careful management of the site's use will mitigate any residual risk to local residents. Notwithstanding this, a Noise Management Plan has been submitted in support of this application.
- 7.6 In terms of landscape and heritage considerations, the operational development has been kept to a deliberate minimum. The use of standard stock fencing as well as a small 'equestrian style' field shelter will result in a proposal that has the appearance within the landscape of being in agricultural / equestrian use, and therefore an expected occurrence and part and parcel of a country-town's hinterland. It will integrate into the existing setting without contrast. Similarly, through the use of a no-dig parking solution and a field shelter which will not require foundations, any residual risk to the SAC at Waterslade Field will be mitigated. Indeed, it can actually be said that the proposed use is of far less potential for disturbance to the SAV than its current agricultural use where the site could lawfully be subject to cultivation.
- 7.7 This proposal clearly concurs with the provisions of the Local Plan, is supported by the NPPF as an Important material consideration, and demonstrably has no detriment to highways, heritage or local amenity. Accordingly the proposal should be considered positively without delay.



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