

Planning Statement

Including Statement of Community Involvement

Erection of Farm Shop Building with Café and Community Room, Access and Parking, Landscaping and other associated works

Land at Bank Top Farm, Hollingworth Road, Littleborough

Applicant - Bank Top Farm

September 2022

Job Number: 18-077

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Appendix 1 – Consultation Leaflet and Distribution Map

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1.0 Introduction

- 1.1 This Planning Statement has been prepared by Maybern Planning and Development ('Maybern') on behalf of the owners of Bank Top Farm, Hollingworth ('the applicant').
- 1.2 It supports a full planning application for the development of a farm shop building with café and community room facilities and associated parking and landscaping to support the diversification of farm operations and long-term viability of the farm.
- 1.3 The proposals will enable the expansion of existing small-scale farm produce sales that currently operate from the farm on a part time basis, diversification into associated and complementary new income streams, and support enhanced employment opportunities for the farm owners, their family and potentially additional staff.
- 1.4 The description of development is:
- 'Erection of a farm shop with café and community room and ancillary accommodation with access, parking, and landscaping and other associated works'*
- 1.5 This Statement provides details of the:
- the site and surroundings including accessibility,
 - background to the farm and current small business operations and the need to diversify and expand,
 - the proposed scheme as a high quality and landscape led development,
 - assessment of the proposals against the up-to-date adopted Development Plan for Rochdale Borough Council (RBC), including setting out very special circumstances for the development in the Green Belt location and accordance with the aims of national planning policy for rural business support and diversification, and
 - technical considerations of the site and the proposed development.
- 1.6 It also includes a Statement of Community Involvement section detailing feedback to a public consultation that has been undertaken by the applicant and the high level of support for the proposals that was received.
- 1.7 In addition to this Statement, the application is supported by the following plans and documents whilst the application fee has been paid via the Planning Portal:
- Planning Application Forms and Certificate (via the Planning Portal ref PP-11419667);
- PLANS**
- Site Location Plan – Drawing Number 21358-0201 Rev P-01
 - Existing Site Plan with Topographical Survey - Drawing Number 21358-0211 Rev P-00
 - Proposed Layout – Drawing Number 21358-2011 Rev P-03
 - Proposed Floor Plans – Drawing 21358- 2001 Rev- P01
 - Elevations Plan – Drawing Number 21358 – 2151 Rev P-02
 - Sections Plan – Drawing Number 21358- 2101 Rev P-01

- Landscape Layout– Drawing Number 474/01 Rev A
- Wider Landscaping Proposals – Drawing Number 474/D/02

REPORTS

- Design and Access Statement prepared by Corstophine and Wright
- Drainage Strategy prepared by Re:Ford
- Transport Statement prepared by Mode Transport
- Farm Business Diversification Statement prepared by Bank Top Farm (including supporting letter from National Farmers Union)
- Landscape and Visual Appraisal prepared by Penny Bennett Landscape Architect
- Phase 1 Site Conditions Report (inc Appendices) and Coal Mining Risk Assessment prepared by BEK; and
- Preliminary Ecological Survey and Assessment including Biodiversity Gain Metric 3.0 prepared by ERAP Consulting Ecologists
- Sustainability and Energy Efficiency Statement prepared by GLD Technical Consulting

2.0 Farm Context, The Site and Wider Surroundings

- 2.1 Bank Top Farm is located c0.5km to the south of the town of Littleborough, c0.5km north of Hollingworth Lake and its visitor car parks and c0.9km north east of the main residential and commercial area of Hollingworth.
- 2.2 The farmhouse and associated agricultural buildings are shown by the blue star on Figure 1 and are set c150m from Hollingworth Road on higher land and is accessed via an unmade single lane access drive that rises steeply up the side of Cleggswood Hill from the road.
- 2.3 The farm covers c17ha and comprises a number of fields that rise up the hill and extend eastwards from the ridge. The land is designated as 'severely disadvantaged' due to its condition, topography and the exposure nature of its location and offers rough grassland for sheep and cattle grazing. The extent of the farm is shown on Figure 2.
- 2.4 The application site comprises a 0.38ha triangular area of the field that lies on the road frontage as is shown with the red diamond on Figure 1.
- 2.5 It is set on the western slope of the hill behind a stone wall that runs along the rear edge of the pavement along Hollingworth Road. It comprises rough grazing land that is initially slightly flatter/undulating immediately behind the wall and then rises up more steeply to the farm access track. Given the hill ridge, no views of the site are possible from the east. A small number of mature trees are located to the south of the site adjacent to the farm access point that will be unaffected by the proposals. An existing gate to the field area is present on the road frontage. A small wet area from a small spring is present in the central part of the site.



Figure 1: Map view of the site

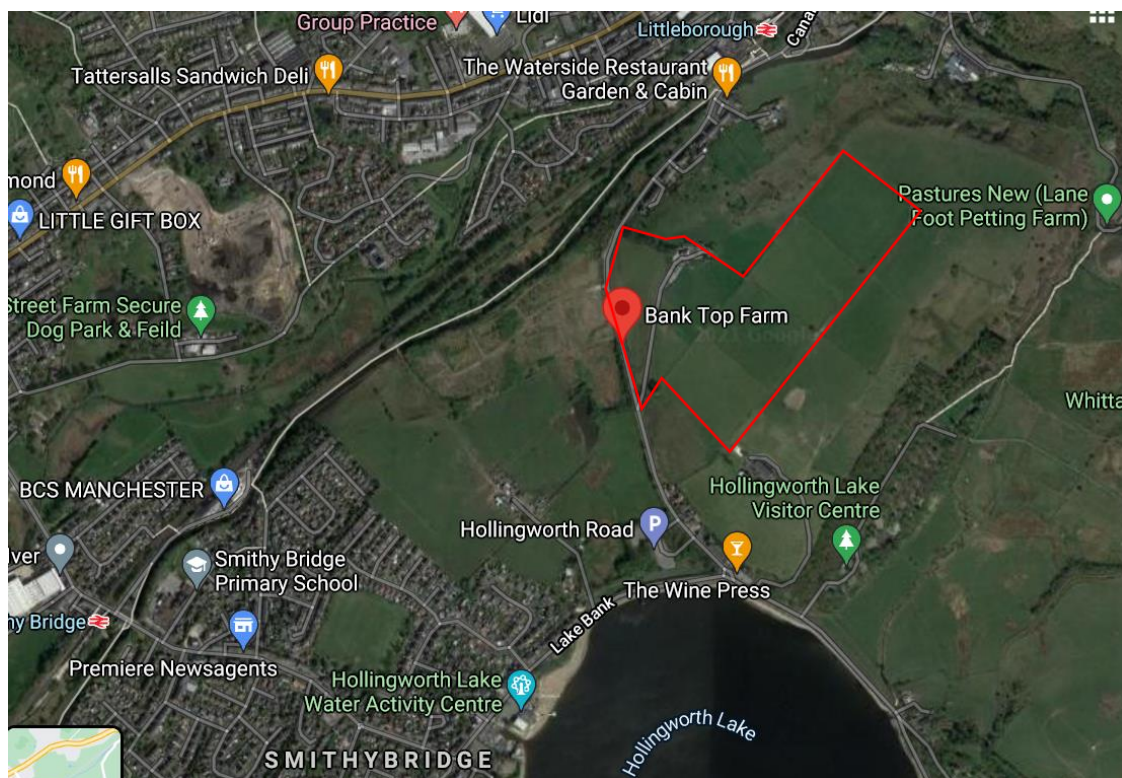


Figure 2 : Aerial view of the site and wider farm area

- 2.6 A photograph of the general area of the site from Hollingworth Road is at Figure 3 (and further photographs are provided in the Design and Access Statement (DAS) and Landscape and Visual Appraisal Report (LVA)).



Figure 3- Photograph of site from north

- 2.7 Opposite to the site, a tall hedge is present along the adjacent field boundary which limits views of the land from the west. Beyond the hedge and extending to the northwest, is generally flatter grazing land and a former works site (AKZO Nobel) that has received planning permission for housing development for c170 dwellings with access from Hollingworth Road (the access road being previously implemented). This land is also subject to a current planning application for similar scale of residential development that would include dwellings fronting Hollingworth Road (LPA ref 21/01146/FUL).
- 2.8 Along Hollingworth Road there is also existing frontage residential development to the north of the farm boundary linking up to the edge of Littleborough and to the south of the farm access track linking down to Hollingworth. Car parks and visitor areas to Hollingworth Lake area are at the junction with Lake Bank to the south.

Accessibility

- 2.9 The site is accessible to the local road network lying immediately adjacent the B6225 Hollingworth Road, a 30mph road with lighting and which now features double yellow lines restricting parking along the road in the vicinity of the site and down to Hollingworth.
- 2.10 It is also accessible via cycling being in proximity (550m) to the National Cycle Network route no. 66 and walking via the footpaths that are present on both sides of the road linking to Littleborough and Hollingworth.
- 2.11 Public transport bus links are available to the site with bus stops located directly adjacent to the land, served by the Rochdale- Littleborough Lakeline service generally every hour or more frequently at times. Rail stations are also present in Littleborough and Smithy Bridge, with services to Blackburn, Manchester, Wigan and Leeds.
- 2.12 A car park to Hollingworth Lake leisure and commercial area is located c 300m to the south (with further car parks also around the lake area).

3.0 Farm Background and Current Operations and Issues

- 3.1 Bank Top Farm is a small-scale livestock farm in family ownership. Fuller details of the farm business are provided in the Farm Business Diversification Statement, with information summarised below.
- 3.2 The owners purchased the farm in 1993 and have improved it from a collection of derelict and unsafe buildings to a family run farm business. Over a 20-year period, the applicants have rebuilt the property, improved associated outbuildings, and invested in new agricultural buildings. They have also reclaimed the land to bring the farm back into operation as a sheep and cattle stock farm. Alongside the grazing of animals, the farm now also raises pigs, a small flock of chickens for eggs and turkeys.
- 3.3 The land is categorised as ‘severely disadvantaged’ due to its condition, topography and the exposure nature of its location which does not allow for arable farming and is only suitable for the grazing of animals. This land constraint also results in a natural restriction on the number of animals it can support which is not going to increase significantly. As a result, the size and operation of the farm holding is supplemented by 12ha of land that rented for grazing purposes.
- 3.4 The current stock levels are:
 - Aberdeen Angus cows- 12
 - Sheep – 80 breeding ewes with c150 lambs per year
 - Pigs – 3 breeding sows and numerous fattening pigs
 - Turkeys – c100
 - Chickens flock
- 3.5 The farm is operated by the owners and their two sons who have progressed into farming after leaving school and agricultural colleges. To enable the farm to support the family, given the land size and nature, other sources of income are required. All members of the family therefore undertake alternative full-time employment beyond the farm to supplement the income achievable from the farm and undertake the farm work in evenings and at weekends.
- 3.6 Whilst the farm sells via livestock markets, some meat is also sold direct from the farm. Additionally, associated with their time growing up at the farm, the sons have undertaken small-scale farm produce sales. This subsequently developed over the last c 9 years to a small, part time business to one of the sons for meat sales from the farm produced animals.
- 3.7 ‘Pete’s Meats’, developed for sales of bacon, sausages, chops and seasonal turkeys, alongside the wider farm sales of whole and half/ jointed lamb and pork, eggs and vegetables, operate primarily at the weekends from a ‘farm shop trailer’ which is towed to the bottom of the farm lane on Hollingworth Road. A small level of pre-ordered sales is also undertaken around other employment times, and the family also attend nearby farmers markets. Such direct sales now support the farm business to an extent, particularly as meat prices from livestock market can be highly variable and generally achieve lower prices than direct customer sales.
- 3.8 Given the small scale and part time nature of this produce business, there are a number of constraints to its operation. These include preparation of some meats from the farm’s animals

is currently required to be undertaken with support of others due to the limited preparation areas and family time with cost implication; sales are of frozen meats and limited product ranges and sizes; the limited weekend sales are constrained by time and also the lack of customer parking opportunities at the farm entrance.

- 3.9 The farm stock levels and operations and the scale of customer sales have now reached a position where further business expansion and diversification is required to enable the sales business to move to the next level and the farm to remain viable and for the family to secure more full-time farm based employment to maintain and expand the business as referenced in the Diversification Statement.
- 3.10 It is also highly relevant that the post Brexit context has removed/alterd potential income streams to farmers and the transitional arrangements to 2027 are reducing any payments that may have been received. A replacement scheme (based on Environmental Land Management Standards for providing environmental benefits) is also not anticipated to offer the same levels of support and likely result in reductions in farm incomes. Information received from the NFU (within the Business Diversification Report) outlines that this level of reduction could be c50% of support.
- 3.11 Instead, Government analysis and considerations to the farming industry is placing principal reliance on diversification as a way to replace lost income streams and to support the viability of farms. An element of this is the launch of the DEFRA Farming Transformation Fund and Programme where support to 'work, processing and diversification' can potentially be offered via grants¹.
- 3.12 This changing context is of direct relevance to the farm which did receive an element of income from rural subsidies.

The Need for Diversification

- 3.13 Having regard to the above farm position and issues, the applicants have fully reviewed options for the farm and business.
- 3.14 It has been concluded that a proposal to diversify the farm and enable the expansion of the associated meat sales business would provide an opportunity to ensure the viability of the farm going forward and to the long term.
- 3.15 The application proposal has been carefully considered over a period of time and with a full development team in respect of review of the site location and constraints and opportunities.
- 3.16 A proposal has been developed that would deliver a purpose built and functioning farm shop with on-site butchery and meat preparation areas focusing on the sale of the farm produce and associated meat-based products. Alongside this a farm café is proposed, a facility that is now common and demanded by customers, that would enable the direct cooking and sale of farm meat meals and snacks and associated drinks and other locally sourced produce.
- 3.17 The proposal would reflect national aims for rural diversification and could deliver a range of other benefits as are set out below. The facility would also support the local area and economy via supporting other local farms and producers, enable opportunities for further job creation, and enhancement of the food tourism potential.

¹ Further government aims for 'rural levelling up' and diversification were published on 2 September 2022 - 'Delivering for Rural England' Report

- 3.18 As part of the current farm operations, the applicants aim for quality, ethically based animal welfare and farming operations with the 'Better Taste, Less Miles' consideration to sales. Accordingly, the applicant is also committed to promoting farm and food education and local community development and opportunities. Connected to the family previous involvement in local schools and farming organisations, the proposal would also enable a community room that would be available for education and activity purposes and wider group activities and meetings.
- 3.19 The application proposals therefore represent an opportunity for the farm to:
- diversify operations via a farm shop and café to support the ongoing viability of the farm and small business and support the potential for that business to expand and move to the next level
 - address operational and sales constraints to the current business
 - support full time family employment at the farm and small business replacing other employment requirements
 - to enable the sale of wider ranges of fresh produce sourced directly from the farm, as well as from other farms in the local area, thus reducing food miles and increasing local choice in fresh food and produce
 - to enable the promotion of wider farming operations for example from field to fork, animal welfare and other rural business and agricultural practices including sustainable and renewable technologies
 - to support other local farms and businesses via the opportunity to provide produce to sell at the farm shop and to use the community space
 - to enable education visits to the community room and wider site and farm to assist with wider educational and development initiatives; and
 - provide a room where other local community groups could meet or hold events.

4.0 Statement of Community Involvement

Pre – Application Engagement

- 4.1 The NPPF² promotes pre-application engagement and ‘front-loading’, stating that:

‘Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.’

- 4.2 The NPPF also confirms at Section 12 (‘Achieving well-designed places’) that:

‘The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.’ (Para. 124).

Consultation with RBC

- 4.3 In considering this proposal, at an early stage of the project, a pre-application advice request was submitted to RBC to allow the opportunity to ‘*approach decisions on proposed development in a positive and creative way*’ (Para. 38 of the NPPF) and, also for any feedback that may influence the future design and site operations which could alleviate or entirely remove any concerns which Officers at RBC may have had.
- 4.4 The pre-application advice request was supported by an outline of the diversification aims and requirements for the proposal to support the viability and needs of the farm and small business and a number of very special circumstances considered relevant to the site’s position in the Green Belt. Initial sketch proposals that outlined that the site context and design quality were of fundamental importance to the applicant even at the concept stages of the proposed building, were also provided.
- 4.5 An on-line meeting was held with RBC on 14 September 2021 and following the meeting, formal written pre-application advice was issued by RBC on 21 September.
- 4.6 Whilst the feedback acknowledged that diversification is to be generally supported for businesses, concerns were raised to the Green Belt location and the considered open setting of the site, and to the potential scale and layout of the proposal (albeit the pre-application submission was based on a preliminary design option for the proposals). In addition, whether very special circumstances (VSC) for the proposal could be demonstrated was also questioned.

² National Planning Policy Framework (2021)

- 4.7 As a result of the RBC engagement the following points have been fully considered in the evolution of the scheme and amendments have been incorporated where possible to enable a scheme that respects its setting and minimises impacts:
- the positioning of the proposed building has been altered – the building has been moved further back and set further into the slope of the site
 - the form and scale of the building has been amended - to offset the upper floor level and sit it back into the site slope to reduce the bulk and massing of the building, and limit the impact on the openness and visual appearance of the Green Belt
 - the roof arrangement has been revised - considerations to a curving roof in the design development stage have been replaced with a gentle sloping roof to 'land' the building into the slope of the site and to minimise the overall height and massing; a curved roof arrangement would have resulted in a greater overall height and mass of the building
 - alterations to the materials palette to increase glazing alongside the use of locally sourced and sustainable materials to lighten the visual context of the building and fit with the rural character of the area
 - the parking area has been revised – setting it further into the site and away from the site frontage and providing a hedge to the site boundary for visual benefits and incorporating provision for a minibus and motorcycle parking to minimise parking levels to serve the various uses proposed for the site and widen parking offer
 - the use of a landscaped stone gabion structure with potential to screen it and reduce the visual impact of site works and infrastructure
 - site access and servicing on site – alterations to the access and space within the car park and site have been undertaken to enable visibility and manoeuvring as commented upon in highways feedback
 - the scale of the community room facility has been reduced slightly to reflect likely uses by school groups (based on class sizes) and other groups
 - providing a more landscaped and natural setting to the area around the site e.g. limiting potential hard-surfacing or paths or ancillary facilities (i.e. play equipment)
- 4.8 Further assessment of the final design and aspirations for proposal having regard to the site context and relevant policy considerations is provided in subsequent sections of this report and the DAS.
- 4.9 In addition to the above, fuller justification to the needs of the business and the benefits that will be offered has been developed alongside other factors to provide clear focus for the VSC for the proposal.

Public Consultation

- 4.10 To assist the applicant in considering the need for the proposal, it's scale and the range of facilities to be proposed, the applicant has engaged with existing customers of Bank Top Farm/Pete's Meats and with the local community.

- 4.11 RBC Councillors for the site ward and the adjacent ward of Wardle Shore and West Littleborough were also contacted to inform them of the developing proposals.
- 4.12 An information leaflet with questionnaire was circulated to around 4,000 properties in the Littleborough and Hollingworth areas. The general catchment area used and a copy of the leaflet is provided at **Appendix 1**.
- 4.13 In addition, the applicant provided copies of the leaflet to customers attending the farm sales trailer and visiting their stall at a farmers' market they attended in Rochdale on 5 June.
- 4.14 From these consultations, 118 responses have been received either via return of the completed questionnaire, email with written responses, or email with general comments.
- 4.15 In a small number of cases, there was duplication of responses between questions 1 and 2, in which case it has been taken those respondents already bought meat from the farm. In addition, there were a small number of responses where not all questions were answered (for unknown reasons), however this was not of a level to materially alter the overall conclusions that can be drawn from the consultation responses.
- 4.16 The results of this consultation have been analysed and are summarised as follows:

Farm Shop and Café

- 58 respondents confirmed they already purchased from the farm
 - 71 respondents confirmed that would like to purchase from the farm – only 2 responses outlined they would not wish to purchase from the farm
 - 107 respondents (95%) supported a farm shop and confirmed they would like it to open during the week as well as at weekends
 - 110 respondents (96%) confirmed they would like to be able to buy fresh meat in addition to the frozen products sold and 112 responses (99%) would support the offer of other local products alongside the meat products
 - 109 respondents (94%) confirmed that they felt a permanent, wider ranging farm shop would enhance the local area
 - 110 respondents (96%) confirmed they would support a small café at the site
- 4.17 From the consultation responses received, it is clear that there is significant support from existing customers and prospective local customers for the farm to extend the current meat sales and increase the range of products on offer via a more formal farm shop as well as diversifying the facilities to be offered with particular reference to an on-site cafe.
- 4.18 It is also highly relevant that a requirement for off-road parking was confirmed in most responses received (112).
- 4.19 From the feedback, there were only two responses that were wholly negative towards the proposal, both being persons opposed to meat production and consumption in principle. It is however noted that at least four other respondents who identified as vegan/ vegetarian were supportive of the proposal where the sale of other non-meat and fresh products could be supplied alongside the farm meat.

Community Based Operations – Room for Use by Local Groups and School/ Education Access

4.20 The applicant also sought feedback on their aspirations for extending the range of uses at the site to be available for use by the wider community and for education purposes. From responses it can be seen that there is also significant support for this wider remit at the site:

- 109 respondents indicated they would support the facility being available for use by local groups in the community for meeting or event purposes
- 105 respondents confirmed they would support the facility being available for use by schools/ groups for education purposes

Other Comments

4.21 In addition to the overwhelmingly positive responses received to the specific questions posed, a number of wider supporting comments were made by respondents, a number of which are summarised in the table below.

Would like to buy smaller quantities as live on own	A farm shop would be fabulous for the village
Not aware you did hampers – would like to support local and small businesses	Think it is important to educate people on where food comes from
Double yellow lines prevent ability to stop and visit the trailer. Haven't bought from the farm due to lack of off-street parking	Would only work if located straight off the road
We have to travel significant distance to access a good farm shop	Interest in nature and the countryside has increased during covid – good to get people to the countryside
Good to celebrate Lancashire produce	A great idea – good luck with your proposals

5.0 The Proposed Development

5.1 This planning application seeks full planning permission for the:

‘Erection of a farm shop with café and community room and ancillary accommodation with access, parking, and landscaping and other associated works’

5.2 This section summarises the proposals and should be read in conjunction with the Design and Access Statement and submitted plans.

5.3 A site and development feasibility exercise has been undertaken by the consultant team to understand key issues and the opportunities presented by the site. This has enabled a high-quality landscape-led development scheme which respects the setting and delivers the range of facilities required by the applicant to support the farm business.

Layout, Scale and Appearance

5.4 The proposal takes advantage of the road frontage location and context of the farm holding as well as the shape and slope of the specific site area.

5.5 The two-storey building has been designed to minimise footprint and to sit into the slope of the hillside with the upper floor being offset further back into the ground form to minimise scale and massing.

5.6 The ground floor accommodation would comprise the farm shop and café accessed from an entrance on the frontage of the building; a secondary door to the café would enable access to the frontage patio area and tables for sitting out with food bought from the café. The accommodation would include:

Accommodation Element	Floorspace Sq m	Use
Farm shop with butchery counter	132 (inc. café area below)	sale of farm meats (beef, lamb, pork, turkey) in various cuts and weights/sizes and fresh and frozen. sale of meat products such as sausage rolls, scotch eggs, meat pies alongside eggs and vegetables from the farm sale of other locally produced produce such as vegetables, cakes, chutneys, pickles, cheese, ice cream, bread etc
Butchery	19	meat preparation area with cold room
Café and kitchen area	132 (inc. farm shop area above)	sale of cold/ limited hot food and drinks for consumption on site and limited takeaway

		it is envisaged there would be c 6 tables providing for c20 covers (in the café)
Toilets	4.9	
Kitchen	17	for food sales preparation
Refuse area	7	
Lobby and access to first floor	3	entrance door on northern elevation and stairs (with future potential for lift access)

- 5.7 At the upper level, the community room would be supported by a landscaped outdoor terrace area running along the front of the building for break-out space. In summary the upper floor would comprise:

Accommodation Element	Floorspace Sq m	Use
Community room	133	use by school groups and nursery groups use/hire by local clubs and organisations as meeting place and for holding activities See Appendix 2 for further information on proposed use.
Kitchen to the community room	9	
Toilets	11	

- 5.8 The building would be constructed of a small materials palette of sustainable sourced materials including timber and local stone with glazing to the frontage in particular. The sloping roof would comprise profiled cladding whilst a fully planted living roof would be provided to the southern single storey area of the café.
- 5.9 The refuse area and services area would be set at the rear of the building and largely screened in views.
- 5.10 Due to levels and the site arrangement, a stone gabion wall would enclose the parking area and its reducing height coming forward would set it into the slope. Stone to be used in the gabion baskets would match the building material and it would be planted to provide it with a high level of green screening and for habitat creation.
- 5.11 It is not envisaged that there would be any other structures/ play areas on the site.

Access and Connectivity

- 5.12 Vehicular access and egress are proposed via a new two-way access point from Hollingworth Road towards the northern end of the site; given the relatively straight alignment of the road, relevant visibility distances for the access can be provided. A separate pedestrian access is proposed via a modification to the existing field gate location.
- 5.13 The access would accommodate movements by larger vehicles for delivery and refuse collection purposes with manoeuvring and turning of such vehicles utilising the wider car park area outside of the shop opening hours.
- 5.14 The car park would provide 15 spaces, including 3 mobility spaces and a minibus parking space. Provision for motorcycles and cycles is also made. There would be a joint use of the parking for visitors to the various functions proposed as is commonplace in such facilities.
- 5.15 The site is also accessible by foot via footpaths along Hollingworth Road to nearby settlements and by bus with stops directly adjacent to the site.
- 5.16 Further details on site provisions for access and parking are provided in the Transport Statement.

Landscaping and Green Infrastructure

- 5.17 The frontage stone wall would be retained around the two access points and repaired where necessary. Native hedgerow would be planted inside the wall and also to northern and eastern site boundaries and to the rear of the building and gabion. It is also the proposed to continue hedge planting northwards along the full length of the farm road frontage along Hollingworth Road. Additional tree planting on the wider farm area is also proposed, with small clusters of trees in corners of some fields reflecting the cluster at the end of the farm access driveway.
- 5.18 Within the site, the grazed land would be largely subject to wildflower meadow seeding and managed accordingly either via limited cutting or grazing. A small area of wetland grasses south of a small spring location south of the building and patio would be maintained and extended with additional wetland planting.
- 5.19 On the patio area, a raised kitchen garden and herb bed area would be supplemented by fruit trees including in planters.
- 5.20 The living roof to the southern single storey element of the building would enable the planting of various species. The first-floor terrace area would include planter boxes for trailing species. The stone gabion wall would be subject to pocket planting and the use trailing plants to enable green screening and habitat creation.
- 5.21 Fuller details of the landscaping proposals are provided on the Landscaping Plan.

6.0 Planning Policy Context and Other Material Considerations

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that *“where in making any determination under the Planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise”*.
- 6.2 The statutory Development Plan comprises Rochdale Core Strategy (CS) which was adopted in 2016, prior to the current national planning guidance.
- 6.3 Material considerations include the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), local Supplementary Planning Documents and supporting evidence / technical reports to the Borough.
- 6.4 The emerging Greater Manchester wide ‘Places for Everyone’ Plan has been subject to public consultation and is at Examination Stage and therefore currently carries limited weight.

The Development Plan

Rochdale Core Strategy (2012)

- 6.5 The CS identifies the site as within the Green Belt and in proximity to the edge of the settlement boundary of Littleborough, which includes an area on the opposite side of Hollingworth Road for expansion of the settlement. Land along the Rochdale canal to the north is also identified as SSSI/ SAC.
- 6.6 A strategic objective of the CS is for a prosperous economy, including developing the rural and visitor economies particularly in the northern Pennine fringe.
- 6.7 Relevant policies of the CS comprise:
 - SP1 – to promote the Borough as an attractive location in terms of jobs, housing, shopping, the environment, image, tourism and quality of life
 - SP2 - to focus development in the Pennine fringe on inter alia the visitor and rural economy
 - E1(L) –to promote complementary facilities and visitor attractions in and around Littleborough to draw upon and provide alternatives to the established recreation and leisure destination of Hollingworth Lake and provide support to the local economy and to promote connections, linkages and improvements including to the Akzo site (opposite the site)
 - E2 - to support the creation and retention of successful businesses and increase jobs to enable a prosperous and lower carbon economy. There are a number of criteria to this policy including the aim to support other employment generating uses e.g. retail, leisure and tourism and, in the North of the Borough, aims to:
 - (b) promote and support small scale and other employment development that generates low levels of park hour journeys and commercial traffic
 - (d) focus on promoting development and facilities that support the visitor and local economy

- (e) support rural economy (including through reuse of agricultural premises in the rural fringe wherever possible for appropriate employment uses)
- E5 – encouraging and supporting proposals that improve the visitor economy including where a need can be demonstrated (proposals only to be resisted if adverse impacts would affect the economy). With reference to growth areas listed, the site is within the South Pennine Moors area and Pennine Fringe visitor and heritage area on the Key Diagram, where development that can enhance the visitor attraction of the Hollingworth Lake area, building upon the attractions and destination area (criteria 6c) and supporting links between the Lake and other countryside attractions and Littleborough (6b) can be supported; the proposal is also in direct proximity to the Akzo site (opposite) where visitor facilities and improved links between the site and Hollingworth Lake/Littleborough are encouraged (thereby acknowledging the general tourism potential of the immediate surroundings)
- E6 – **to support, strengthen and diversify the rural economy** and where possible **increase rural employment**, including where it enhances the landscape; **supports facilities for tourism**, recreation and associated products and services for local communities and visitors in the north of the borough; **support agriculture** and other appropriate activities which help to sustain economic activity whilst maintaining and improving the appearance and rural character of the borough's countryside. Proposals in the Green Belt will also be supported where in line with national policy and where delivers quality design and biodiversity, **supporting agriculture, the processing and marketing of local produce, provides for tourism and recreation**, and delivers environmental quality and sustainability (*Maybern emphasis*)
- C8 – to support the provision of community facilities
- P2 – to protect and enhance the borough's character and countryside, including requiring new development to integrate successfully with natural features, and for sustainable development including reference to accessibility, climate change/ flood risk, landscape and design
- P3 – for high standards of design
- G1 –encouraging development in accessible locations
- G2 – encouraging energy reduction in design of new development
- G4 – reflecting national Green Belt aims including the demonstration of very special circumstances for development
- G6 – sustaining the green infrastructure including encouraging sustainable tourism and wider access from urban areas, and protecting and enhancing land management
- G7 - biodiversity (or geodiversity) interest and land management
- G8/ G9 - flood risk mitigation and consideration to land conditions
- T2 – locating development where good access to public transport is available or can be provided and effective provision for cyclists, pedestrians and people with impaired mobility
- DM1 – outlining general development management criteria including good design, accessibility, amenity, minimising pollution and ground instability risk, and ensuring appropriate landscaping

Places for Everyone

- 6.8 Whilst currently of limited weight, the emerging plan includes provision for a large housing allocation and Green Belt release opposite to the site (North of Smith Bridge JPA22) – part of the site is subject to extant planning permission and a current planning application for large scale housing development and other parts of the site are also subject to public consultation for a forthcoming planning application.
- 6.9 Policy JP G 10 follows national guidance for Green Belts and also outlines that positive and beneficial use of the Green Belt will be supported where this can be achieved without harm to its openness, permanence or ability to serve its five purposes; matters also considered include enhancement of green infrastructure functions, such as improved public access and habitat restoration and helping to deliver environmental and social benefits to residents.
- 6.10 General policies for sustainable development and quality in design and sustainable access are included in the plan, including JP-P1 and JP C1.

Material Considerations

National Planning Policy Framework (2021)

- 6.11 The NPPF sets out the Government’s planning policies for England and how these should be applied.
- 6.12 It establishes sustainable development having ‘*three overarching objectives*’ which are economic, social and environment objectives (para. 8). It confirms these objectives ‘*are interdependent and need to be pursued in mutually supportive ways*’. In respect of the economic role, there is aim for a strong, responsive and competitive economy and to support growth and innovation.
- 6.13 The NPPF supports the conditions for businesses to invest, expand and adapt and places significant weight on the need to support economic growth and local business needs and wider opportunities for development (para 81).
- 6.14 It also recognises that there are locational requirements for some sectors, and that sites for local business needs in rural areas may be beyond existing settlements (para 85).
- 6.15 Further, it fully supports the sustainable growth and expansion of business in rural areas including diversification of agricultural and land-based businesses and sustainable rural tourism and leisure development that respect the character of the countryside (para 84).
- 6.16 It is also outlined that the sequential approach should not be applied to applications for small scale rural offices or other small scale rural development (para 89).
- 6.17 New buildings in the Green Belt are recognised to be inappropriate (unless for a range of uses) but can be approved if very special circumstances are demonstrated and the potential harm to the Green Belt including to its openness and purposes, is clearly outweighed by other considerations.
- 6.18 Other elements of national policy of relevance to the proposal include the aims for good design, low carbon development and enhancements to biodiversity.
- 6.19 Other key matters within the NPPF relevant to the proposals include:

- promoting walking, cycling and use of public transport (para. 104)
- for development to add to the overall quality of the area, *'including the surrounding built environment and landscape setting'* (para. 130)
- to assist with protection and enhancing landscapes and trees and biodiversity including via opportunities for net gain (para. 131 and 180); and
- to accord with aims for climate change and minimising flood risk in terms of locations of development and energy efficiency/ good design (para. 153 and 157).

Supplementary Planning Documents

6.20 Relevant SPD to the proposal comprise:

- Biodiversity and Development (2008)
- Design and Planning Process
- Climate Change and Adaption (2012)

Research - Diversification as a Means of Farm Support

- 6.21 It is clear from recent and current research that farm diversification is an increasing trend and requirement as economic and farm support mechanisms change.
- 6.22 Harper Adams University in combination with the Farm Retail Association have undertaken a large-scale research programme (2021/22) on the issues and benefits of the farm retail sector and highlighted the growth of the sector in recent years and its contribution to the rural economy via income (£1.4bn) and jobs (c25,000) with over 1,500 farm shops now present in different scales and forms.
- 6.23 It considers the growth of the sector and that farm shops offer a different experience to high street shopping through the quality of their produce and their standard of service, differences that are increasingly appreciated by customers.
- 6.24 Research by the University of Aberystwyth (2022) also considered diversification within the agricultural sector as a method for farm businesses to break even and make profits more consistently as traditional farming strategies, particularly in small-medium enterprise farms (SMEs), which act as the core of most rural landscapes, struggle to achieve net profit gains without the addition of government subsidy schemes such as the basic payment scheme (BPS). It confirms that diversification is regularly highlighted as a method of capturing alternative financial gains and that in 2012 it was noted that 50% of UK farms gained some form of income from non-farming diversification. This is now likely to have raised with the types of diversification also expanding from farmers markets and veg boxes to farm shops and farm experiences.
- 6.25 The recently published DEFRA report 'Delivering for Rural England- Second Report' (Sep 2022) acknowledges the Levelling Up aims and issues for the rural parts of the UK including following the changes to the EU funding arrangements following Brexit and now also with the current cost of living and other economic pressures facing the economy. In respect of the transition away from subsidies, the paper recognises the key aims for food and farming including diversification:

‘The government recognises the benefits which farm diversification can bring to strengthening the wider rural economy. The National Planning Policy Framework (NPPF) provides that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through the conversion of existing buildings and the erection of well-designed new buildings, as well as the development and diversification of agricultural and other land-based rural businesses’.

- 6.26 The report also acknowledges that the visitor economy is a major source of employment in rural areas and that *‘the government wants to see a growing, dynamic, and sustainable tourism sector reaching its full potential and driving growth in every nation and region of the UK’.*
- 6.27 Key support to diversification of the farming sector is therefore at the forefront of current government policy.

7.0 Key Considerations for Assessment of the Proposals

7.1 In assessing the proposal, consideration is required against:

- key policies of the development plan and other material considerations of national guidance in respect of:
 - Principle of Development
 - assessment of the proposal in relation to its impact on the openness and visual appearance of the Green Belt and to the demonstration of very special circumstances (VSC) to outweigh any perceived harm to the Green Belt and
 - rural development and supporting business growth and diversification
 - Other Design and Layout and General Development Principles
- Other technical considerations
 - Drainage
 - Ecology
 - Highways and Accessibility
 - Landscape Considerations and Provision
 - Ground Conditions
 - Sustainability

7.2 These are reviewed in the following sections.

8.0 Assessment Against the Development Plan and Other Material Considerations

Principle of Development - Green Belt Considerations

- 8.1 As the site is located in the Green Belt where a new building for a farm shop proposal is not listed as an appropriate form of development in the Green Belt, it is necessary to undertake a balanced appraisal of whether the proposal would result in material harm to the openness or purposes of Green Belt, and if so, whether there are benefits or VSC to the development to justify and outweigh the level of harm that may arise.
- 8.2 Whilst the overriding policy for the consideration of Green Belt policy is contained in national guidance and reflected in local policies, there is no clear definition of 'openness' or what constitute VSC; it is for assessment of a proposal, the benefits that could arise, and having regard to interpretation from matters in case law, to which proposals should be accordingly assessed at the local level.

Consideration of Impact on Openness

- 8.3 As there is no definition of openness in the NPPF, the issue has been considered in the Courts. The judgement in *Timms v Gedling BC* (2014) EWHC 654 (Admin) held that openness was "*an absence of any building or development*" and that "*any development constitutes an impairment to openness, at least to some degree*"; whilst all development will therefore by definition be harmful, this should not result in all proposals being rejected i.e. where very special circumstances arise.
- 8.4 Subsequently, the decision of *Turner v East Dorset Council* has held that openness can involve various factors including consideration of how built up the Green Belt is both now and if development were to occur, the scale/volume of development, and visual factors i.e. the visual context /sensitivity in the landscape and to the scale and importance of views both in short and long range considerations.
- 8.5 In this respect, whilst the proposal will by definition be harmful to openness, the level of harm is considered to be minimal as follows.
 - the site is not considered a highly sensitive or isolated location in the Green Belt
 - the site is contained by the road and farm track and set within the context of a main road frontage with existing built infrastructure and services (road, pavements, streetlights, bus stop and significant traffic movements etc), whilst it is also relatively close to settlements
 - views of the site are generally 'contained' by the slope of the land and to an extent by surrounding landscaping (e.g. the hedging opposite and the trees to the south) whilst the site is separated from more open parts of the wider and more sensitive, undeveloped Green Belt that extends from the ridge of the hill to the east of the site
 - a landscape and visual appraisal of the site has concluded that the site is primarily visible in short range public views along the road corridor and in limited other public views from footpaths (from the west only) and that the

landscape character of the site from published assessments is a semi-urban and mixed context, rather than a highly sensitive and open moorland character (as referenced further below and in the LVA)

- further, whilst the pre-application response from officers outlined that the planning history and development plan context of the land on the opposite side of Hollingworth Road was not to be considered material to this proposal, the high likelihood of significant housing development on land in very close proximity in the near future should be a factor to the assessment of the site
- the proposal has been designed in terms of siting, layout, scale and landscaping via a business and landscape led approach to seek to minimise impact on the openness of the site and immediate surroundings.
 - the layout and scale of the proposal have been fully considered to be the minimum required for the use and needs of the business
 - by setting the building into the hillside (in a section with a slight natural hollow), and now via its off-set arrangement, with the upper-level further back, this minimises the scale/ footprint on the site and its projection into views
 - the roof arrangement and use of a green roof on part of the building also seeks to take advantage of the form and vegetated nature of the hillside to minimise the visual context of the building and its impact on openness
 - the provision of hedgerows to boundaries can enclose the site and prevent development extending to more open areas and would reflect the landscaping assets of the immediate surroundings and to soften views of the proposal and minimise the degree of impact on the current open nature of the site

8.6 The site therefore has an existing context of development and activity and is not a wholly open or undisturbed Green Belt location whilst the scale of the proposal and its design and materials has sought to minimise its scale and appearance.

8.7 The landscape and visual assessment concludes that whilst the proposal would have an impact on the nature of the openness of the site itself, it would generally have a low impact on the visual openness of the land from wider views and in its wider context (see later sections also).

8.8 Therefore, whilst there would be some impact on the openness of the Green Belt, as any development in a Green Belt location would, it is considered to be limited in scale and visual context and a minor impact.

Assessment against Green Belt Purposes

8.9 It is considered that the proposal does not materially conflict with the purposes of Green Belt as defined in the NPPF. This includes via:

- Encroachment: the site is contained visually and spatially by its topography, landscape features and road and access infrastructure and is not considered a highly isolated or featureless/ open area of Green Belt. The proposal will not therefore result in encroachment into a highly open or highly sensitive area of Green Belt

- Sprawl: by virtue of its siting, scale and landscaping and the applicant's intentions for the proposal it would not encourage further development on the site nor provide a precedent in the immediate area which could result in sprawl
- Merging of settlements: the proposal would not result in the merging of settlements
- Urban regeneration: as the proposal is fully related to the farm operations and produce, it would not undermine the aim for brownfield development elsewhere in the Borough; and
- Historic Town: this is not relevant to the proposal.

8.10 Taking the above into account, the proposed development is not considered to result in significant material harm to the purposes of Green Belt.

Demonstration of Very Special Circumstances

8.11 Local and national planning policy advise that inappropriate development may be acceptable where an impact on openness is present if VSC are demonstrated and the balance of such VSC weigh in favour against the level of harm that may occur.

8.12 There are considered to be a number of VSC that can be weighed in favour in the assessment of this proposal as follows:

- Business needs of the farm and small business for growth and diversification to support the viability of the farm business; this being locationally dependent to the farm holding
- Support to farm viability to assist future land management and improvement given the changing regime of agricultural subsidies and external inputs
- Support to the local economy via a boost to the local food and visitor and tourism economy; also having regard to significant positive need and feedback for the provision of a local farm shop in the local community
- Support to other local farms and businesses/ producers
- Direct employment for the family on the farm fulltime and potential future additional employment to the local area
- Support to education resources with focus on farm and food interpretation and to wider community groups and resources in the local area
- High design quality and low impact site infrastructure
- Sustainability and low carbon design and operations via low energy use equipment, insulation and efficiency of use; and
- Biodiversity benefits via significant net gain and improved site landscaping

8.13 In assessing these matters it is the view of the applicant and development team that clear VSC are present to address the limited scale harm to the openness and visual appearance of the Green Belt that would result.

- 8.14 Having regard to the demonstration of VSC as part of the assessment of the case for the application, the matters also generally accord with the consideration of the proposal against the relevant policies of the development plan and national planning policy framework. As such, assessment of the proposal against the development plan and other relevant policy context is also therefore undertaken in this section to avoid duplication.

Business Need and Requirements for Diversification

- 8.15 The application proposal fully accords with aims for rural diversification as encouraged in national planning policy and recent government reports and business and farming support schemes that are addressing the implications of Brexit and the recovery from the pandemic. It also fully accords with support for businesses, diversifying the rural economy and agriculture and aims for tourism and recreation growth as set out in local policies E2, E5 and E6 of the CS, for example:

'To support, strengthen and diversify the rural economy and where possible increase rural employment....support agriculture, the processing and marketing of local produce...' (policy E6)

Diversification for Business Growth and Viability

- 8.16 The clear business need for growth and diversification of the farm given its limited land size and quality and the stock levels it can accommodate and the changing farming context is provided in the applicants Business Diversification Report and the issues recognised by the National Farmers Union (NFU) representative.
- 8.17 The farm has experienced a number of years of losses after considerations to costs, revenues (from stock sales), falling subsidies and the requirements for continued investment in the holding. In this respect, over the last 5 years, losses have been experienced in the last 2 years, and there has been a 316% reduction in the level of income (net profit) from 5 years ago. As a significant element of this, the rural aid payment has reduced by over 51%.
- 8.18 The variable and unpredictable market prices for animals prevent accurate future business planning and the farm has therefore sought to expand the direct sale of produce to public customers to seek to maximise values and more certainty to ongoing viability. The opportunity to grow the businesses via the diversification proposals for full farm produce sales via a farm shop would therefore assist the farm greatly and seek a return to profit and ongoing viability.
- 8.19 Addressing the operational constraints of the current meat sales as summarised earlier is also necessary to enable the customer sales business to grow. The provision of a dedicated and formal shop outlet expanding functions to include all butchery and product preparation, increased sales capacity, expansion of the limited sales hours, and addressing parking issues is therefore necessary.
- 8.20 Growth and improvement of the farm produce sales elements alone will however only enable a level of business growth, limited to the farm size and stock numbers. As such, the associated benefits of a farm café to diversification and economic growth of the business are linked to the produce of the farm and is a facility that is now largely expected and demanded by customers to farm shops; a factor clearly seen in the responses to the consultation exercise where 96% of respondents would support a small café as part of the proposals. The offer of a small café would provide a further directly associated source of income to support the farm.
- 8.21 Similarly the community room would support the business via a further connected income stream, building primarily upon the educational/community aims that the applicants hold for

its use fully associated with farm operations (as outlined above), and by wider recreational use and hire by other community groups.

- 8.22 Therefore, as the farming industry faces uncertain times, the applicant is aiming to secure the long term economic future for the farm business and improve its resilience to cope with the market and changing support frameworks. Diversifying and expanding based on the farm qualities, resources and the existing produce business would therefore provide this aim in line with national policy advice and government statements and accord with the criteria of policy E2 to support the creation and retention of businesses, including other employment generating uses (retail, leisure/ tourism). Further it would also accord with the aims of the policy for business in the north of the Borough to support small scale and other employment development that generates low levels of peak hour journeys and the rural economy. It also fully accords with relevant elements of policy E6 to support agriculture and the processing and marketing of local produce.
- 8.23 To date it is only a result of the external employment and incomes to the family that investment in farm operations, land improvement and fixed assets has enabled the farm to continue to operate and the family to remain farming. Without the opportunity to address such economic matters in this location, it would clearly undermine the immediate and longer-term viability of the farm and likely ultimately result in its failure e.g. as members of the family move to other family circumstances/retirement and the opportunities for external incomes to support the farm operations change.
- 8.24 Whilst policies of the CS support rural growth and diversification there are also considerations to ensuring proposals address the landscape and rural character. As such, the scale and range of elements proposed have been fully considered and are small scale and the applicants are keen to only draw upon associated offers of the farm that would utilise their produce and other local goods. The approach therefore limits the size of the proposals to minimise the scale and fully consider the landscape and rural character of the area whilst enabling a further source of income to sustain the business and support the family. Further, without the proposal that would enable ongoing farming and management of the land, gains to the land improvement and productivity undertaken by the family would likely also be lost resulting in detriment to the landscape in visual and character terms.
- 8.25 As such, and as referenced later in respect of design analysis, the scale and appearance of the proposal has been fully considered such that the proposal aligns with all associated elements of policy E6.
- 8.26 It is also relevant that in line with the NPPF, small scale rural development does not require considerations to the sequential test or impact assessment.

Tourism, Local Economic and Community Benefits

- 8.27 It is widely accepted that farm shops and cafés add to local tourism and the economy as well as providing income to a farm business (research by universities and Farm Retail Association).
- 8.28 Many farm shops appear on tourism websites, have tourism road signage and attract visitors from beyond the immediate local catchment and form 'agri-retail' facilities.
- 8.29 The area of Hollingworth and Littleborough is an established tourism area and destination (as recognised in the CS and other Council publications) and the proposal would therefore add a further agritourism element to this local economy; likely also attracting some pass-by trade from visitors to the area.

- 8.30 The local research undertaken by the applicant in terms of the availability of farm shops in the Rochdale Borough area has found this to be limited and that the nearest offers are c 7-10 miles away (Halifax/ Delph) and beyond, such that there is a geographical gap. It was also seen in feedback to the recent public consultation that local residents referenced having to travel 10+miles for a good farm shop offer. As such, there is a level of local demand and market need for a farm shop.
- 8.31 The applicants consider that a small café would assist the diversification and tourism element of the business expansion– a large scale offer e.g. catering for a coach party is not the aim or intention of the proposal. Rather it would serve the local area and customers to the farm shop, but with some potential for tourism and pass-by customers.
- 8.32 As above, the applicants aim to also provide school and nursery focused educational farm information and visits which would build upon the curriculum and wider public aims to educate children in food chains, field to fork and the natural environment, as has particularly grown in the public conscious during the pandemic and to enhance knowledge of sustainable growth and food production and usage. The community room would therefore enable classes to have talks, undertake activities and view information whilst the linkage to the wider site and habitats it holds and the wider farm would enable real experiences to be had. Community feedback to the recent public consultation was highly positive to enabling an educational element to the proposals.
- 8.33 The community room would also be available at other times for hire to local community groups and organisations, again which the local consultation was broadly supportive of, with a number of groups being suggested as likely having interest to use the room.
- 8.34 The inclusion of these elements and opportunity to enhance facilities for tourism and recreation and services for local communities and visitors is in line with criteria of policy E2, E5 and particularly E6 of the CS along with policy C8 for community facilities.

Support to Other Local Farms and Businesses

- 8.35 The intention for the farm shop and café to offer sales of products and goods from other local farms and businesses in the area would also further enhance the rural economy and local businesses.
- 8.36 Given the focus on fresh and local produce, there would not be direct competition with shops in nearby towns; instead, the focus on products sold with knowledge and enabling customers to ask about production and quality would be key.
- 8.37 Again, this sits with the criteria for supporting agriculture and marketing of local produce in policy E6 of the CS.
- 8.38 It is relevant that planning conditions to secure the sale of goods to farm and local products could be utilised and this could be considered by the applicant if necessary to the LPA.

Local Employment

- 8.39 It is considered that the proposal would also enable the offer of a small level of further employment opportunities in addition to the family taking on fuller time employment at the farm business. There is also initial consideration to staff to serve in the shop and café albeit this level would depend on operations.

- 8.40 This would provide a further benefit to the local job market and economy in line with criteria (d) and (e) of policy EC2.

Locational Requirements

- 8.41 Policy E6(b) also aims to create stronger physical and economic linkages between the urban and rural areas, whilst the NPPF accepts that rural businesses will require a setting beyond towns - *'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'* (para 85).
- 8.42 In this respect, the proposal is wholly related to the farm operations and its produce and it would not meet the aims for a true farm shop and café or provide for the 'food to fork' and farm education provision if it was not associated with the farm location.
- 8.43 Given the farm-based context required, the applicants also considered locational options for the proposal on the wider farm holding. The application site was concluded to result in lesser impact on visual and Green Belt considerations and to raise fewer technical issues therefore being the most appropriate location. In this respect:
- there are no existing vacant or redundant buildings available for alternative use in the farm complex
 - to provide additional buildings and site infrastructure at the higher levels of the farm holding would be more visually intrusive and require the widening of the farm access track for its full length such that car movements and activity would be more visible along the hill ridge
 - there would also be potential safety issues from public uses in proximity to a working farmyard area
 - the location proposed is the most accessible, including via a range of means (bus, walking, cycle) and best serves customer use for access, viability and safety
 - its location also makes most viable contribution to tourism potential of the area
- 8.44 Clear locational needs and advantages are therefore present for the proposal at the farm and in this location on the farm. Whilst the farm is within a Green Belt location, this should not prevent the business from growing and diversifying where VSC and other clear benefits arise.
- 8.45 Given the above business and locational elements, the remit for allowing diversification and growth is accepted in national and local policy.

High design quality and low impact site infrastructure

- 8.46 The appointed team includes C+R who have significant experience with regards to high quality commercial development schemes and, with the benefit of Penny Bennett and ERAP appointments, the team fully considered how the scheme could be of high quality architecture designed into the landscape whilst also promoting ecological and landscaping enhancements and functions.
- 8.47 Taking reference from rural buildings on 'Grand Designs' and other exemplar rural buildings, the applicants brief to the development team was for a building that respects the local rural

vernacular and materials and accommodates the business requirements in an efficient and low-key manner.

- 8.48 The Design and Access Statement details the scheme evolution and considers:
- a connected site and design - connecting the physical appearance of the location, topography and site features and the proposal via its form, scale and materials palette
 - acknowledging the site's agricultural use and its wider context and (semi) rural character
 - minimising extent and impact of associated infrastructure including via scale, form and materials
 - considerations for sustainably sourced/local building materials and future maintenance and environmental performance of the building including use of renewable technologies where possible (as discussed further below).
- 8.49 As the design has regard to a landscape led approach, further assessment of design is also referenced in the visual and landscape section below.

Lack of Visual and Landscape Harm

- 8.50 As referenced at this start of this section, case law has considered that alongside the physical/volume implications of development on openness and appearance of Green Belt, visual considerations of development in views in its surroundings and the landscape context is also relevant.
- 8.51 In this respect, a Landscape and Visual Appraisal (LVA) has considered the site, its context and key views. Penny Bennett was commissioned at an early stage to advise on visual and landscaping matters including visual site parameters, constraints and key viewpoints to inform the preparation of the scheme.
- 8.52 The LVA considers the existing landscape resource and visual context of the site and provided recommendations to help set and integrate the proposed development in this context. The design proposals were then assessed to consider potential visual effects and any proposed mitigation, and also to advise on enhancing both the landscape setting and biodiversity of the site context.
- 8.53 The LVA confirms the proposal is not within a National Park or Area of Outstanding Natural Beauty and outlines its Green Belt designation and key considerations of the rural character areas in which it is located; in this respect the national and local character areas both recognise the transitional nature of the area on the edge of urban settlements (rather than an isolated rural setting). The LVA also highlights the developed context with road infrastructure and activity.
- 8.54 With reference to the topography of the site and the wider valleys/Green Belt setting, the LVA confirmed objectives for the siting of:
- to integrate the building in its landscape context
 - to minimise and incorporate functional requirements and associated building and exterior spaces 'into' the landscape

- to provide a landscape setting which compliments the existing landscape assets and rural character of the area; and
 - to include landscape features and a management strategy which will enhance the landscape biodiversity on site (discussed further below).
- 8.55 Given this visual context and the site topography, the DAS references the design evolution to build into the contours and natural slope/hollow of the site. Large sections of the ground floor is built into and therefore 'hidden' in the hillside whilst the rear section of the first floor is also fully set back into the topography. There is also provision for plant to be screened to the rear.
- 8.56 The form and scale of the frontage sections is highly influenced by the materials choice and the design aim for a rural/ agricultural character for the landscape setting. In this respect, the façade at ground floor would be a natural/rural element akin to a stone wall, whilst the first floor would be more akin to an 'agricultural shed' but broken up in massing by significant areas of glazing, the set back of the facade and use of planted areas. The stone gabion element to the parking area would also have a character of a stone wall or potential quarry or rock cliff, which can be found in the wider area, however it would also be planted to soften the visual change to the current grazing field. The use of grasscrete to the majority of the parking area would also retain a low-key change to the wider site area.
- 8.57 The LVA has then assessed the proposed development visually. Whilst it is concluded that there would be some slight or moderate adverse impacts on some public views from wider footpath views (from the west only) (partly a result of assessment of the value of the views), it is also highlighted that the views are typical and not unique, and that views of the proposed building would be largely glimpsed or partial views of upper parts of the building only as a result of topography and landscape screening. Also, such views would be temporary as walkers pass by the footpaths.
- 8.58 Closer views from the road have been assessed to be slight adverse to moderate adverse. However again as such views are temporary as walkers or drivers go past the building only (rather than permanent/long term views), the material nature of the impact is considered to be reduced.
- 8.59 Changes to the site context itself whilst permanent have been mitigated by the high-quality design and agricultural form of the building to sit into the landscape and setting and the landscaping proposals and therefore considered appropriate.
- 8.60 Taking the above factors into account, the location, siting and scale of the farm shop would not be significantly visible in permanently held public views, and the form and materials of the building would be rural in nature and character, and not considered to result in any material harm to public or private views.
- 8.61 Given the above, it is concluded that whilst the proposal will, by definition, have some negative effect on the openness of the Green Belt by the introduction of 'volume/ footprint' of development (as any new development would), given the form of the building mostly set into the topography of the site, the materials and the limited external infrastructure and landscaping, the level of change to views and wider views of the site is considered to be minimal.
- 8.62 It is also relevant that over time the proposal would be assimilated into the landscape as a low key rural building as materials weathered and landscaping establishes, and as there are other rural buildings in the views from the west it would not introduce development into a 'virgin' landscape.

- 8.63 As such, the proposal is considered to align with policy SP2 and relevant elements of policy E6 providing a rural economic proposal in the Pennine fringe area having due regard to the appearance and rural character of the countryside, policy P2 via potential for integrating into the natural features and protecting the countryside character and policies P3 and DM1 for high standards of design.

Landscaping Provision and Ecological Enhancement

- 8.64 The natural setting and habitats context of the site have also informed the landscape intentions for the proposal from the outset.
- 8.65 The landscaping scheme demonstrates how native hedging, as well as wildflower meadow planting and expansion of the existing marshy area can provide for aesthetic and landscape benefit and also to promote enhancement of biodiversity at the site. The landscape architect (in liaison with the ecologist) has also fully specified a planted living roof for the single storey element of the building and fruit trees, shrubs and herb garden planting to the patio area and more natural bird, bat and invertebrate planting for the gabion wall.
- 8.66 In this respect the scheme has been fully assessed against the newly published Natural England Biodiversity Gain Metric 3 and can be concluded to score at 20% gain. This level is significant and would provide a significant upgrade from the current low level of the site. It is also considered that this level of gain could enable the site to be utilised as an 'exemplar scheme' for the Borough in terms of this new biodiversity provision (and future requirement).
- 8.67 The Ecological Report also confirms that a future management plan could enable the proposed landscaping to remain effective and to assimilate into the rural character of the site.
- 8.68 The landscaping proposals are therefore compliant with the NPPF and development plan including policies G7 and DM1.
- 8.69 Accordingly, this collaborative approach has catalysed biodiversity benefits to be very significant and overreaching emerging standards, resulting in a benefit which constitutes a VSC.

Energy and Sustainability Enhancements

- 8.70 To seek to provide a building of significant merit and limited resource take requirements, the applicant commissioned a high-level review of potential energy and sustainability measures that could be incorporated in the building via full assessment at detailed design stage.
- 8.71 In summary, the review has concluded the following measures could potentially be provided at this site:
- Solar Photovoltaic (PV) could be considered - it is relevant that the landscape consultants have advised that it is not pragmatic to provide PV panels on the roofline for aesthetical reasons and alternative ground-based options could be more suitable, which could be assessed at a later stage if to be proposed
 - Air source heat pumps to use renewable energy taken from ambient air to heat the building and provide a heat source throughout the year or ground source heat pump
 - passive ventilation replacing mechanical ventilation to reduce energy use

- Rainwater harvesting

8.72 In addition to the above, the following measures are proposed:

- Use of thermal efficient glazing systems and the use of large/roof glazing areas to increase natural light penetration to reduce/offset lighting needs
- EV charging points for cars; and
- Low energy light fittings.

8.73 Further sustainability gains would also be achieved at the site via the accessibility of the site by a range of means for potential customers to undertake local produce shopping. It also provides reduced miles to the farm via the sale of produce at the farm shop rather than animals being transported to markets to sale.

8.74 As such, there are a number of sustainability benefits that could class as VSC to the proposal and would be in line with policies G2 and P2/T2 for energy reduction and accessibility.

Overall Assessment

8.75 Given the above, it is concluded that the proposal does benefit from VSC and accords with the aims of policies E2 for supporting existing businesses and policy E6 for rural economic development in particular where proposals in the Green Belt will be supported where it delivers quality design and biodiversity, supports agriculture, the processing and marketing of local produce, provides for tourism and recreation and delivers environmental quality and sustainability.

9.0 Technical Considerations

Drainage Strategy

- 9.1 Re:Ford has prepared a Preliminary Drainage Strategy (DS) to support the planning application. As the site is less than 1ha and within flood zone 1 no flood risk assessment is required.
- 9.2 Given the topography and understood geology of the site, the SuDs drainage hierarchy review has concluded that infiltration is not likely to be possible. It is recommended that the site can drain to an existing combined sewer in Hollingworth Road. Consideration to greenfield runoff rates with reference to relevant climate change to 100 years has been undertaken and it is concluded that a satisfactory drainage design can be provided with attenuation provided on site to restrict flow rates. Full details of the scheme and management can be submitted pursuant to a suitably worded planning condition for agreement prior to commencement of development.
- 9.3 Foul sewage from the site will also utilise the existing combined sewer provision in Hollingworth Road.
- 9.4 As such the DS has considered relevant factors and confirms that the development of the site can be appropriately designed/managed in terms of drainage to not result in flood risk in line with policy G8 of the CS and climate change /flooding policies of the NPPF and can utilize and build upon the existing drainage regime in the area for an efficient use of infrastructure.

Ecology

- 9.5 ERAP have assessed the site and prepared a Preliminary Ecological Appraisal assessing the site's habitats and potential to support wildlife. The site survey from April 2022 fully considers the site and adjacent trees and the boundary wall feature.
- 9.6 In summary the Ecological Assessment report for the site finds that:
 - habitats on the site are of limited ecological significance and not unusual with other similar habitat present in the area
 - there is limited potential for nesting and foraging birds in the trees and site or for presence/ foraging of bats
 - no invasive species were found
- 9.7 The proposed development will not result in direct impacts to any designated sites given distances to such sites and will not result in undue harm to ecological value of the site or any habitats of significance.
- 9.8 As referenced previously, the proposals and the landscaping scheme which has been developed in consultation with ERAP can provide a biodiversity net gain associated with the DEFRA metric 3.0. This review has demonstrated that new and improved habitat can be provided at the site including:
 - improvement and extension of the marshy grassland area around the small spring to include a wider range of wetland species and habitat potential

- introduction of native hedgerow planting to boundaries and to the rear of the building and car park area
 - significant areas of wildflower meadow seeding and growth
 - herb and fruit trees/bushes area as a kitchen garden feature and also herb and produce source to the farm shop and café use
 - relevant planting and bird/ bat box and nesting facilities to the gabion wall to encourage invertebrates, bats and birds
 - planting to the terrace areas of the building and the creation of a living roof to the single storey section of the building
 - bird and bat boxes to the trees and building
- 9.9 In addition wider habitat enhancement proposals also planned for the wider farm site can also further support ecological gain including the continuation of native hedgerow all along the Hollingworth Road frontage and provision of a number of trees in field corners, reflecting historic planting patterns on the farm and in the area.
- 9.10 As a result of this, the BNG review confirms a gain of 20% in biodiversity would be achieved.
- 9.11 Ensuring development would not be to the detriment of ecology including priority species and/or their habitats is therefore in accordance with policies G7 and E6 of the CS and Paragraphs 174 and 180d of the NPPF.

Transport Statement

- 9.12 Mode Transport has prepared a Transport Statement (TS) to support the planning application. In summary, the TS concludes that:
- the proposed development accords with relevant national and local policy aims with regards to transport and highways matters
 - the development has been assessed in terms of traffic generation and capacity of the adjacent network and there is no evidence to show the proposed development will have a detrimental impact on highway safety
 - the site is accessible by a range of sustainable modes of transport including on foot, cycle, bus and there are also train links to the adjacent settlements that are also in relevant distances for walking or linked trips (cycle or bus). Bus stops are adjacent to the site and provide a clear source of access
 - the vehicular access to the site will be provided from the site's western boundary providing appropriate visibility splays and for access by a range of vehicle types including refuse vehicles and delivery vehicles
 - separate pedestrian and cycle access is also proposed utilising the existing gate access and will be directly accessed from the existing footways
 - swept path analysis shows that a refuse vehicle can enter and exit in a forward gear via safely manoeuvring within the proposed car park area. Appropriate provision for servicing

via private arrangements outside of the opening hours of the farm shop can be ensured by the applicant (and secured via planning condition if considered necessary); and

- appropriate parking levels can be achieved in the site with provision for a range of vehicle types. Based upon the mix of facilities proposed on the site, as is normal practice with such establishments there would be significant joint use of the facilities such that separate parking standards are not required to be met and instead a level accommodating the joint use and based on the operator's consideration of potential patronage and uses is considered acceptable

- 9.13 Based on the above, it is concluded that the proposed development would have a negligible impact on the local highway network and is highly accessible such that there should be no highways or transportation reasons to preclude the granting of planning permission and the scheme accords with criteria of policies T2 and DM1 of the CS and para 111 of the NPPF.

Landscaping

- 9.14 Penny Bennett Landscape has prepared a detailed landscaping plan to support the planning application in combination with the landscape appraisal of the site and in consultation with the scheme ecologist.
- 9.15 As referenced above, the plan includes significant new planting that will greatly enhance the biological focus of the site, but also provides for a scheme that sits well with the landscape and visual context of the site and wider area.
- 9.16 As such, native species hedges (rather than trees) and ground-based vegetation are proposed to support the building.
- 9.17 Full regard has therefore been had to the aims of local policies for landscaping including the considerations of Policies P2, E6 and DM1 of the CS.

Ground Conditions

- 9.18 The site has been assessed via a Phase 1 Ground Conditions review and also a coal mining risk review.
- 9.19 This has identified that the site has historically remained open fields however the area has a history of underground coal mining. From review of records, the deep mining is not considered to have any implications for the site proposals and is not required to be considered further.
- 9.20 Given the ground conditions a phase 2 intrusive survey is recommended prior to development commencing to confirm immediate land condition and inform foundation and consider the existing spring, concrete specification, water pipe specification, and waste soil classification. A basic gas mitigation review and any measures in accordance with Characteristic Situation 2 as specified in CIRIA 665 is also recommended. The SI strategy can be formulated along with verification proposals pursuant to a standard planning condition for submission prior to development commencing.
- 9.21 Provisions in line with Policy G9 of the CS can therefore be met.

Sustainability

- 9.22 Achieving sustainable and energy efficient provisions within the development has been a key factor within the scheme development and on to its delivery as outlined above in relation to building design, materials, use, wider site landscaping and accessibility.

Summary

- 9.23 From the above and assessment of the submitted technical reports, there are no technical matters which would preclude the grant of planning permission for the proposed development.
- 9.24 It is anticipated that a series of planning conditions to a grant of planning permission would be relevant and would be generally in line with standard technical matters that are covered by planning conditions.

10.0 Conclusion and Planning Balance

- 10.1 The development has been assessed against relevant up to date policies of the development plan and found to be in accordance.
- 10.2 Given the site's location in the Green Belt, it is considered that VSC do exist for the proposal and that it would not result in material harm to the purposes of Green Belt. As a result, it is concluded that these elements outweigh the limited harm to the openness and visual intrusion to the Green Belt context that arises from the proposal.
- 10.3 It is also considered that the proposal accords with key policies for supporting rural businesses and development and support for rural diversification as contained in national and local policy.
- 10.4 In respect of the three elements of sustainable development of the NPPF, and flowing from the VSC, the proposal provides significant relevant benefits as follows:

Social

- Provision for local choice in fresh food shopping
- Provision of a facility for early years education purposes on farming and rural environment
- Provision of a facility for local community groups to meet and socialize
- No material harm to public views
- No harm to residential amenity

Economic

- Support to the viability and growth of a local business as well as other local farm and Lancashire based producers
- Local jobs support for construction companies and related local suppliers during the construction process
- Local jobs during the operation purposes; also the potential freeing up of other jobs held by the family as they seek to transfer to full time working in the farm shop/ café business
- Support and expansion of local tourism facilities via agri-retail tourism

Environmental

- Significant biodiversity gain on the site and wider farm holding – both to flora and fauna
- Accessibility by a range of means with cycle, foot and bus accessibility to the site and also accessibility to the wider rail network

- No undue floodrisk to arise and relevant drainage provision to be made
- No harm to heritage assets
- Delivery of a high-quality building that respects the site and rural character of the area
- Appropriate landscaping and new planting to the site that respects the ecological character of the site and area
- Maintain the long-term management and quality of the wider land on the farm and for landscape maintenance purposes
- Sustainability considerations to the building fabric and it's operations

- 10.5 Having regard to para 11 of the NPPF, the relevant site policies are considered broadly up to date with national guidance. It is also considered that even if policies are out-of-date, VSC for the proposal are present and policies for Green Belt would not provide a clear reason for refusing the development.
- 10.6 The proposal is considered to form a sustainable development and has significant benefits.
- 10.7 The information and technical documentation submitted in support of this application demonstrate that there are no significant adverse impacts of the proposal and in light of the accordance with up-to-date development plan and sustainable development the application should therefore be approved.



Bank Top Farm *Better Taste, Less Miles*

Bank Top Farm, Hollingworth Road, Littleborough, Lancashire, OL15 0AU

Email: banktopfarm@btinternet.com Mobile: 07551942594 Telephone: 01706376574

We pride ourselves in only selling meat from animals which have been reared on our own farm

Dear Resident

We have been selling our produce direct from the farm for many years since our sons James started selling eggs and Peter bought his first pig from which he sold sausages at Littleborough Farmers Market. Since then, we have expanded the range of meat we sell direct from the farm to include beef, lamb and turkey and have established the mobile shop we tow to the bottom of the farm lane (Hollingworth Road) every weekend.

We are now progressing with plans to build a **permanent farm shop** at our farm to enable us to open throughout the week and to sell a wider range of fresh meat alongside other produce from local businesses.

We are also thinking of including a **small café** using our farm produced ingredients and other local goods, and a **community meeting room** which can be used by groups and schools in the Hollingworth and Littleborough areas.

We would appreciate a few minutes of your time to answer some short questions and help us to gather thoughts and views from the local community about our plans for diversifying the farm.

You can hand this survey back to us or alternatively you can email your response (scanned copy or written) to banktopfarm@btinternet.com

Your Name:

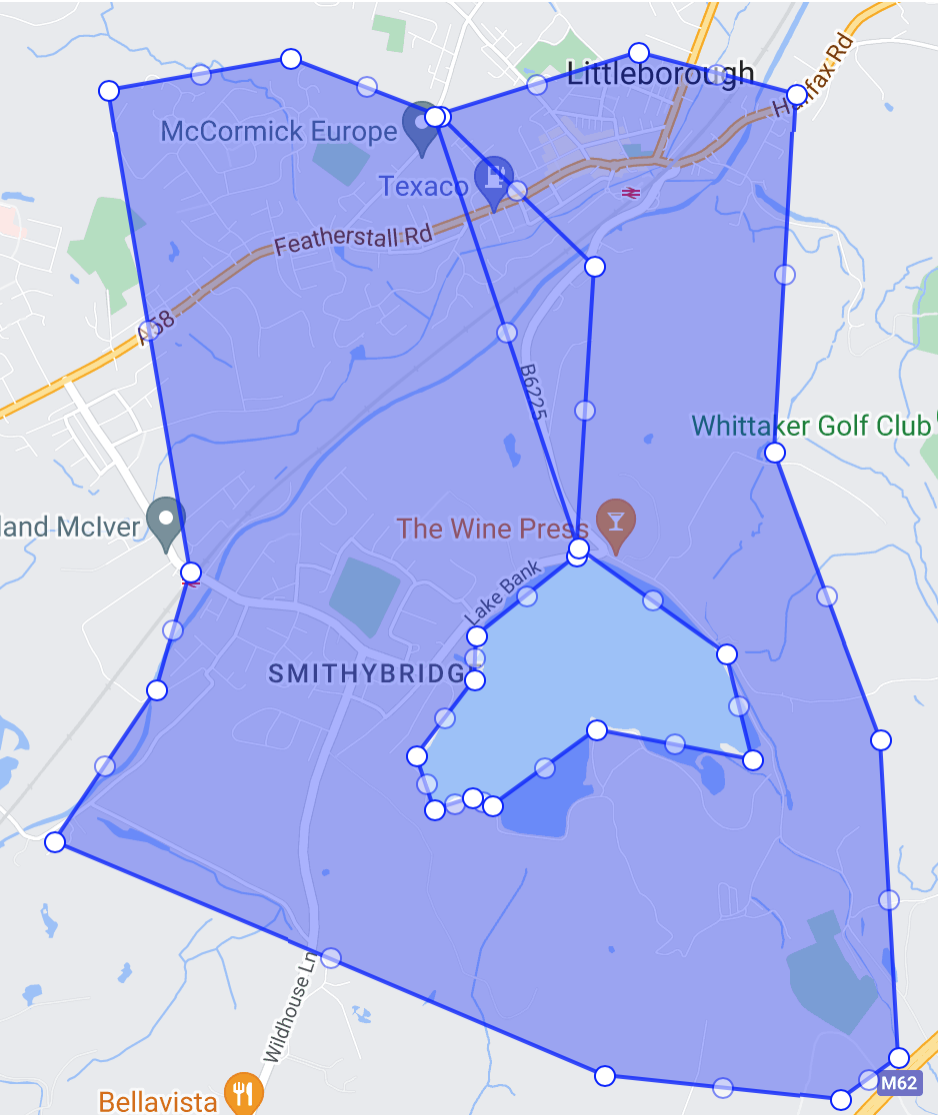
Your Postcode:

1. Have you bought meat from us previously? Yes / No
2. If you've not bought from us previously, would you like to buy meat and other products from us (or other local producers) at a farm shop at Hollingworth Road? Yes / No
3. Would you like the farm shop to be open during the week as well as weekends? Yes / No
4. Would you like to buy fresh meat direct from the farm? Yes / No
5. Would you support a small café on the farm? Yes / No
6. Would you like to be able to buy other local unique products (not available in supermarkets) e.g. artisan jams, pickles and cheeses (as supplied in our Christmas hampers)? Yes / No
7. Is there anything else you would like us to offer? *[Please provide comments]*
8. Would you support a facility to be used by local schools/groups to learn about food, food production, farming and the environment? Yes / No
9. Would you support this facility being used by other groups in the local community for meeting or event purposes? Yes / No
10. Are you involved with a group that might be interested in using the room/site? Yes / No
[Please provide comments]
11. Do you feel the proposed farm shop will enhance the local area? Yes / No
12. Do you think a farm shop with parking off the road would encourage you to visit the shop?
Yes / No

Have you any other comments about the proposal to diversify our farm with a permanent farm shop with café and community meeting room *[Please provide comments]*

Thank you for your comments, from all at Bank Top Farm.

Leaflet Distribution Area – Bank Top Farm Proposal



Appendix - 2

Community Room Considerations

It is understood that the community room use is likely to comprise an educational and social function.

Education

During weekdays, it is most likely that the room would be used for school/ nursery group visits for education and meeting purposes.

This could achieve visits of a class (c 30 children and few adults).

It is anticipated that such purposes would involve local school/ nursery children walking to the site or utilising a minibus to visit.

Social

During weekdays, it is envisaged that the room may also be used for small group functions e.g. toddler groups, yoga, groups meetings, likely between 10am-3pm.

At evenings it is considered that the room could be booked for larger group purposes e.g. Young Farmers, WI, activity groups. Likely visitor numbers may be up to approx. 30-40, however it would be likely to involve significant levels of joint trips/ car sharing journeys or drop offs.

At weekends, it is envisaged that there would be more limited group meetings during the daytime periods. Also, as the site would not have an alcohol licence, it is not envisaged that there would be larger evening social functions.