

Planning and Development
Rochdale Council
Number One Riverside
Smith Street
Rochdale
OL16 1XU
FAO Mrs Carney

19 February 2024

Dear Mrs Carney

Bank Top Farm, Hollingworth Road, Littleborough- LPA ref 23/01061/FUL

Further to our meeting on 18 January and your email of 24 January, on behalf of the applicants we now provide additional information to this application. This includes:

- Updated Business Diversification Statement (Feb 2024)
- Farm Location Considerations Review (Feb 2024) – *it is requested the Appendices to this report (farm plan and photographs) are **not** posted on-line to the application due to safety and privacy concerns to the operations of the farm. Please can this be confirmed on receipt of this submission.*
- Highway and Access Note (Feb 2024)
- Landscape and Visual Note (Feb 2024)
- Proposed Ground Floor Plan ref 21358-2001 Rev P04
- Elevation Plan ref 21358- 2151 Rev PO5

Business Diversification Statement and Produce Information

Clarifications on Statement

The updated Business Diversification Statement (Feb 2024) provides clarification on the farm costs to 2022 account figures and recent changes in the Rural Aid payments. Correction of an income figure is also provided (an income line from the accounts was previously omitted in oversight).

Stock Levels

Further information on farm stock was provided in the 2023 Statement including levels and length of rearing to support the supply of the farm shop and café meat levels throughout the year. Beyond this, the basis of stocking would be based on the product levels secured from each animal and type of animal dependent on animal weight, age and the type/range of products required to be obtained from the animal at the point in time in the year. It is also considered that the applicant's assessment and planning for the enterprise over the last few years has been on the basis that the farm can supply their produce throughout the year.

Farm Produce Levels and Goods Condition

The applicants are clear that the farm shop and the café would be outlets for their meat products. As confirmed in the Statement and during the meeting, the café would sell a significant proportion of meals and products involving farm produce (e.g. sausage rolls, cooked and cold meat sandwiches,

cottage pies, burgers etc). Whilst this element has not been included in the farm produce to be subject to the goods percentage, it would be a further outlet for the farm produce and direct support to the farm income and the 'true' farm shop and café intention of the applicants and uplift to the farm produce element of the proposal. As such, the 40% farm produce figure for the shop, which was a minimum in any case, and would likely be higher at times e.g. spring lamb, Christmas time, would be supported by the café sales.

The applicant is concerned that this café sales element has not been taken into account by officers in raising concerns to the percentage goods level proposed and (request) that a higher figure should be used.

Having reviewed other farm shops that are subject to a larger goods figures (e.g. c60% + farm sales) it is noted that these are significantly larger farm shops in terms of floorspace proposed; as such, the larger size therefore enables a larger volume of non- farm goods to be sold alongside farm produced goods to support farm income, as it is widely held that farm shops sell other associated local and non-local goods. For example, Brosters, Kirklees had a retail floorspace of 140 sqm; Hinchcliffes Kirklees had a retail floorspace of 828 sqm; Kenyon Hall, Warrington had a retail floorspace of 153 sqm; Cedar Farm, Mawdesley had a retail floorspace of 250 sqm; Home Farm, Bisham Green a retail floorspace of 129 sqm.

The proposal at Bank Top Farm has a retail floorspace of 84 sqm, significantly smaller than these.

Notwithstanding, since the recent discussion, the applicant has reviewed the farm produce level to be subject to the goods condition. Given the remit of the café to also sell meals and products using farm produce (albeit the café wouldn't be subject to the goods condition¹), they consider it is reasonable to uplift the farm shop farm produced goods level to 50% of the total product range of goods to be sold to ensure the proposal is fully related to the farm and business needs and constitute very special circumstances relevant to the farm business. It is still to be recognised that this 50% level is a minimum and at times of the year the farm produced goods would exceed this level.

This uplift would still enable space within the shop to sell other local products and vegetables etc. that farm shops normally offer. Specific local suppliers that the farm works with include Reedys (chutneys and jams), Pextinet (cheeses), local honey producers and local artisan bread and cake makers. They are not seeking to compete with supermarkets or other convenience stores that sell a significantly wider range of convenience and sometimes non-food goods. Indeed the applicant would accept a further condition not to sell newspapers, toilet rolls and cleaning products, pharmacy goods, and furnishings, electronics/ battery goods etc. as well as the full range of normal non- food goods listed on a standard non-food condition, thus preventing any other concern to the future of the building.

It is highly relevant that the Valuation Office Agency (VAO) has recently issued updated guidance in their Rating Manual on the assessment of farm shops². This states that FARMA (Farm Retail Association) has launched a certification for farm shops and that to qualify as a registered farm shop

¹ This is due to the mixed nature of café meals and goods – eg sandwiches involve bread and butter and sauces and salads; cottage pies in addition to the farm meat include mashed potatoes, carrots, peas, gravy granules, salt etc etc

² [Rating Manual section 5a: valuation of all property classes - Farm shops and winery shops - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/rating-manual-section-5a-valuation-of-all-property-classes-farm-shops-and-winery-shops)

the outlet must offer at least 40% of stock from the farm and local area and another 40% from the region. The revised goods split as now proposed is above such guidance and considered reasonable for the farm shop scale and nature and also given the café goods remit.

We would kindly ask for review and feedback on this percentage amendment prior to the application being reported to Planning Committee.

It is noted that Officers have questioned the inclusion of existing meat sales in the overall income level of the farm and assessment of the condition on farm produce. As the 'existing' farm meat sales would occur from the farm shop (rather than the trailer) it is reasonable to include the existing income (as well as the lamb sales uplift that now occurs) in the 'overall farm produced' income level. As such, of the c£92,000 figure (from the updated Business Statement), c£56,000 of this or over 50% would be from farm produce. Whilst the projected café income would not be subject to the goods condition (on practical reasons as explained), Officers are now fully aware that the joint café operation by the applicants and its sale of farm produce would fully support the viability of the farm business.

Size of Building

Further justification has been requested on the size and function of the building. The farm shop main retail area at 84 sqm is supported by associated elements including a butchery and preparation room for meats which will significantly improve on the space and functioning of the applicant's current house facilities, a kitchen for food preparation for the café and ingredient-based farm produce goods to sell in the shop and café, and the café itself.

Given the queries on the scheme, the architect has undertaken review of the areas proposed having regard to the applicants requirements and operations and there is requirement to also include a small staff break-out area and toilet in the building (staff were to be served by the upper floor kitchen and toilet area in the previous scheme); this is now provided by a re-ordering of the kitchen and café toilet area rather than any increase in the building footprint. An updated Ground Floor Plan ref 21358-2001 Rev P04 is now submitted.

The layout and scale of the building is fully related to the aims of the applicant for diversifying and ensuring the ongoing viability of the farm holding, and as above, it is significantly smaller than other farm shops including in Green Belt locations.

As further information to assist officers in respect of the building, there is requirement for:

- the servery to have two areas as raw meat is to be kept separate from cooked meats. There will likely be two chillers in the shop area for pre-packaged farm goods in both categories, a chiller for cheeses and then displays for local products and vegetables.
- the butchery area to have separate chillers/freezers for freshly slaughtered meat and for meat products once prepared, and preparation areas for both the jointing and cutting of meat and the preparation of associated fresh meat goods e.g. sausages, mince, burgers.
- the kitchen will require areas for the preparation of food and drinks for direct sale on the day via the café and for the preparation of ingredient-based products using the farm meat e.g. sausage rolls, pies, ready meals for sale through the shop and daily meals via the café as well as washing up space, cutlery/ crockery storage, ingredient storage etc.
- the café area has been limited to c20 covers to enable it to provide an associated facility, income stream and draw for the proposal. Again in this respect, it is noted that other farm

shops have significantly larger cafes e.g. Hinchcliffes 276 sqm (up to 20 staff are quoted in its supporting information), Kenyon Hall c100 sqm, Longmans, Cheshire 148 sqm, Warren Hill Farm, Mid Suffolk 140 sqm (farm shop and café approved in November 2023). This scale is clearly not proposed at this location at c38 sqm seating area.

The applicant has visited many farm shops to view the requirements and consider the scale of building and proposals to be relevant to their specific farm holding and business intentions.

Locational Aspects

To provide additional clarifications to the various reasons why the farm shop building has been positioned as proposed (as referenced in the Planning Statement), three additional statements are now provided.

Locational Considerations Statement – Bank Top Farm

This confirms no existing buildings are available or suitable for re-occupation at the farm complex, farm operational and safety considerations including to the access lane prevent siting at the farm complex, and land quality considerations.

Highway Note – Review of Access Junction and Farm Lane – Mode Transport

This confirms the existing farm access junction is unsafe for the proposal and cannot be improved within the applicant's land or the adopted highway. Also that an alternative junction location and design cannot be provided to required highway standards. Such alternative junction location would also require the loss of at least two mature trees at the end of the lane (with landscape and visual implications as assessed by others – see Penny Bennett Note (Feb 2024)).

The consultant outlines that the single carriageway farm lane should ideally be widened to enable two-way movements and provision of a footpath for the type of movements that would occur requiring significant engineering and embankment works. An alternative design that could be possible in terms of development traffic levels only, via the provision of passing places would still require widening of the whole length of the route for a footway for safe and sustainable access with engineering and embankment improvements with visual implications.

It is therefore demonstrated that safe or suitable access cannot be achieved to a location at the farm complex via the farm lane.

Landscape and Visual Note – Penny Bennett

The provision of a new farm shop building and car park with lighting and movements at the higher ridge front position, and associated highway changes to the access lane and junction are determined to result in large visual issues and which could not be appropriately landscaped to reduce the level of impact. Car park and access works would still be required to support any re-purposing of an existing building (which has been suggested by officers, albeit none is available), therefore maintaining the large visual implications.

It is therefore concluded that siting the proposal at the farm complex would be significantly more visually detrimental than the scheme as proposed.

Other Locational Considerations

Whilst it is understood that low weight is to be afforded to the tourism element of the proposal, there will be a level of pass-by traffic and linked trips via visitors to the Hollingworth Lake area. As the farm complex is not visible from the road at all benefits to shop trade and to the local economy and tourism would be lost. It is also considered that the lack of visibility and significantly lower level of accessibility to the farm complex generally would affect trade levels overall and the aims to support and diversify the farm.

Officers reference to paras 85/89 of the NPPF is questioned. As a 'true farm shop' proposal it requires a farm location and is beyond the settlement edge in a countryside location³ such that sequential assessment is not considered necessary. Officers have also stated in previous reports that the site is 'highly rural' and 'isolated'; the recent response contradicts previous comments.

Design

The recent email response references the removal of the green roof element. Following reassessment after the previous application refusal, the removal of the community use elements and review of the building form to keep footprint to the minimum required, this has resulted in the removal of this element on design and cost grounds.

The roof parapet capping has now been reviewed and a slimmer element now proposed as requested by Officers in the email. Revised Elevation Plan now provided.

Energy and Sustainability

It is the applicant's aim to include energy efficient and sustainable measures where-ever possible at the detailed design stage. However given the potential uncertainties on securing planning permission for the scheme it has not been possible for the applicant to commit to incur significant additional costs of such design work at this time. This should not defer from the applicant's ambitions for such aspects in the overall scheme delivery and they trust this will not be overlooked in the final assessment of the application. A planning condition to confirm the scope of such technologies should planning permission be granted can be utilised as referenced in the Planning Statement.

The recent email reference to sustainability and milage for animals being transported to an abattoir as opposed to market is also questioned as all animals are required to be slaughtered at a licenced abattoir under law. It is not therefore considered reasonable to question this element of the scheme as it is a lawful requirement (albeit it should be noted the market is c 17 miles further distance from the farm).

We would kindly request full feedback from Officers following review of the now provided information and additional Statements prior to the application being reported to Planning Committee. If anything further is required in respect of the above, please contact us.

Yours sincerely,



Sarah Jones

Planning Consultant

For and behalf of Maybern Planning and Development

³ albeit with a residential development site to be in proximity