



IN ASSOCIATION WITH



PLANNING STATEMENT

New Green Farm, Lower Shorne, Gravesend, Kent

October 2024

PLANNING, DESIGN & ACCESS STATEMENT

In support of a full planning application for the
**Construction of agricultural workers dwelling for the farm's manager, including
the provision of all associated landscaping, biodiversity enhancements and
drainage infrastructure**

at

New Green Farm, Lower Shorne, Gravesend, Kent

On behalf of

AC Goatham & Son

Bloomfields is the trading name of Lambert & Foster (Bloomfields) Ltd (company no. 08278915) an owned subsidiary of Lambert & Foster Ltd a Limited Company registered in England and Wales, No 10574225. Registered office 77 Commercial Road, Paddock Wood, Kent TN12 6DS.

CONTENTS

1. Introduction	3
2. Industry background	7
3. Company Background.....	15
4. Planning History.....	24
5. Pre-application advice.....	25
6. Proposal	26
7. Design and Access Statement	28
8. Agricultural justification	30
9. Planning Policy	37
10. Other material considerations.....	53
11. Conclusion	67
12. Appendices	68

1. Introduction

- 1.1. This supporting Planning, Design and Access Statement has been prepared on behalf of AC Goatham & Son for the provision of an agricultural workers dwelling for the farm's manager and associated landscaping and drainage facilities at New Green Farm, Lower Shorne, Gravesend, DA12 3HL Kent. This application follows the dismissed appeal of application 20210970. Whilst it has been established and recognised that the farm needs an on-site presence all year round, this application seeks to provide a re-designed dwellinghouse to ensure that the proposal would be appropriate within the Green Belt.
- 1.2. New Green Farm is an agricultural holding which is situated to the north of Lower Shorne, Higham between the larger towns of Rochester and Gravesend.
- 1.3. New Green Farm was purchased in 2018 by AC Goatham & Son and currently extends to approximately 85 hectares, for the production of top fruit. In addition to this, the farm currently contains a general purpose storage building, farmyard and irrigation tanks as well as a seasonal workers mobile home. The farm has permission to site and store six seasonal workers mobile homes (but not all of these have been provided due to vandalism and security concerns) as well as having permission for cold storage facilities. There are plans to provide additional cold store facilities on site so that all of the apples harvested can be stored on site, rather than just a partial crop capacity.
- 1.4. The holding is not located within any landscape designated areas, other than the Green Belt and is situated within flood zone 1 with a low probability of flooding.
- 1.5. AC Goatham & Son farm land extends to some 2,400 acres located all over Kent. The business employs over 450 people on a full time basis, whilst there is a seasonal requirement for circa 1150 people across the business.
- 1.6. AC Goatham & Son are renowned award winning fruit growers, first established in 1947 and in their third generation of farming, with the fourth currently being 'trained up'. AC Goatham & Son are currently producing over thirteen varieties of apples and pears.
- 1.7. The additional land that has been purchased at the application site since the last application submission will be planted up with 40,000 of the Jazz variety, which has different husbandry and timing needs compared to the other two varieties at New Green Farm.

- 1.8. This application follows a number of previous refusals for applications to provide a farm manager's dwelling to allow the farm manager to reside on site. One of these applications 20210970 was also dismissed at appeal. This application seeks to address the concerns raised by the Inspector.

Dismissed Appeal overview

- 1.9. A brief assessment of how this proposal responds to the Inspector's comments and seeks to address these concerns is given below:
- 1.10. The Inspector accepted and agreed that the Council have also accepted, that AC Goatham & Sons fruit growing business is extensive and there is no reason to doubt that it is commercially viable. The Inspector acknowledged that large scale investment has already been undertaken to buy the land, plant the trees (and install the associated wirework growing and irrigation systems) and have specialist equipment for the management and harvesting of the apples (as well as providing a storage building).
- 1.11. The inspector also agreed that there is no suitable available housing in the vicinity of the site as a reasonable alternative to the construction of a new farmhouse to support the farm holding.
- 1.12. The Inspector considered that an essential agricultural need exists at New Green Farm, in line with Paragraph 84 of the National Planning Policy Framework, for a rural worker to live permanently at or near their place of work in the countryside. The Inspector set out at Paragraph's 12 to 15 of his decision that this need was significant and justified in line with policy. These Paragraphs state:

"12. From the detailed evidence put to me I can see that the fruit trees need continued and regular on-site monitoring for their protection during winter months; detailed pruning when not in sap; individual irrigation and nutrition in the summer months; and detailed knowledge and assessment about when to harvest in the autumn. Moreover, the variety of fruit grown results in some variation as to when and how this work is carried out.

13. Much of the work is also carried out by seasonal workers and the evidence given was that there was a need to have direct supervision on site to carry out diverse tasks which the workers may not have been used to in their native land compared to this intensive type of fruit farming. The business had also experienced a high turnover in seasonal staff recently because of UK entry restrictions which had meant that many of the tasks had to be explained and supervised regularly. Although this direct on-site management is not year-round, it is mostly undertaken on a daily basis and involves a thorough knowledge of the state of the trees to brief and oversee the workers.

14. I was also shown the nature of the equipment stored in the large shed. There was a considerable investment in specialist machinery and equipment for pruning and harvesting which was all used on this holding and was not equipment that was shared around from the other farms in the appellant company business. There is a clear justification for a residential presence on site to help prevent crime and the loss of this equipment and investment. There also appeared to be a need to respond to emergencies in such aspects as the delivery of irrigation and nutrition in the spring and summer seasons through the equipment installed inside the shed which supplies every tree.

15. Whilst the farming operation does not have livestock which can require round the clock supervision, I am satisfied that the nature and scale of the operation does justify a permanent residential presence on site to ensure the effective operation and security of the enterprise. The principle of the erection of an agricultural dwelling on the holding therefore accords with the provisions of paragraph 84 of the Framework and the guidance in the NPPG.”

- 1.13. It is therefore reiterated and maintained that the agricultural need for a farm managers dwellinghouse at New Green Farm is justified and essential for its workings.
- 1.14. As establish at appeal it is therefore an accepted principle that New Green Farm requires at least 24 seasonal agricultural workers to manage the harvest, thinning and undertake seasonal tasks for the management of the 67.5 hectares, which has now increased further. It is also accepted that this land management does not simply fall away when the more intensive seasonal tasks are over; the farm still needs to be managed all year round.

- 1.15. In order to provide year-round management a dwelling is being requested to provide accommodation for the farm's manager and their family. The farm will be managed by Ross Goatham and his wife Gayle Goatham, who are both Directors of the business and take an active role in farming. Their residence on site will between them and together with their sons allow them to undertake general day to day tasks such as orchard checks, irrigation checks, worker management as well as being on hand for emergencies and to respond to weather conditions.
- 1.16. The Inspector did have concerns about the siting and scale of the dwelling proposed. These centered around a lack of being within sight and sound of the farm hub, rather than just overlooking the main vehicular access points as well as the scale and design of the building not being centred around an active 'hands-on' worker at the farm.
- 1.17. The Inspector has raised concerns over the viewpoints that different parts of the house have at the holding as well as ease of access to the farm office.
- 1.18. This application resubmission has been designed to respond to these points raised. The dwellinghouse proposed has been significantly scaled back in area (186.7 square metres proposed in comparison to the 267 square metres dismissed), ridge height (8.6 metres high compared to the dismissed 9.5 metres), form and overall bulk.
- 1.19. The position of the dwellinghouse is now located to the south west of the approved and constructed agricultural building and west of the seasonal workers accommodation, and west of the approved cold store. The dwellinghouse's proposed position, orientation and layout of the rooms provides views across the orchard, farmyard, cold store and seasonal workers accommodation from the office and key living areas, as well as key views from the master bedroom at night.
- 1.20. The farm office has its own separate entrance to support the workings of the farm during the day, should meetings not take place out in the orchard or in the farmyard pre and during work tasks.

- 1.21. Whilst this ensures that the farm manager is situated closer to the farmyard for its management, it will also ensure that the dwelling will be provided close to existing built form, which will reduce the potential perceived impact upon the openness of the Green Belt.
- 1.22. The land profiles of the area, looking to the site from roughly the ‘four compass points’ and overlooking housing developments, are provided within **Appendix 1**. These land profiles demonstrate how (on all viewpoints apart from to the north) the proposal site is situated at a lower land profile in comparison to the surrounding area, with intervening higher land between the existing housing and the proposal site. This natural topography, combined with the planting and growth of orchard trees as well as the landscaping that will be provided as part of the scheme, will ensure that the proposal is not readily visible.
- 1.23. It is therefore put forward that the proposed position of the amended scheme will be well screened within the landscape and would also not be situated within the open part of New Green Farm, being closely situated adjacent to the existing built form. The proposed design and orientation will also ensure that monitoring of the site for security and ease of management use can be achieved.

2. Industry background

General Industry Overview

- 2.1. The vast majority of topfruit handled in Kent and the UK, perhaps in the order of 75%, is done so by a small number of companies. This includes AC Gotham & Son.
- 2.2. These businesses have all had to adapt their growing techniques in recent years to replant orchards on new rootstocks at closer densities. This is to meet the demands of their customers (the supermarkets) who in turn are seeking to meet the demands of the general public (the consumer) for an increased volume of home-grown apples and pears, whilst maintaining an affordable pricing structure. As well as increasing volume by planting at higher densities, orchards are being replaced with higher yielding clones, whilst the introduction of wire networks encourages fruit growth upwards to better utilise space and allow fruit to be picked at two levels (top and bottom – the latter being done with specialist picking platforms). Again, increasing volume production per tree.

- 2.3. As a consequence, low yielding orchards (even if they are relatively young in the lifecycle of a fruit tree) are quickly becoming unsuitable and require replacement with more modern, higher yielding stock. To ensure orchards perform at their optimum they need to be closely monitored and suitable action taken depending on weather patterns to optimize yields, but also fruit size. Monitoring fruit size is critical as this dictates whether contracts continue or not as customers require specific fruit sizes for optimum prices. It is therefore imperative that the business can monitor water application, thinning, pruning, harvesting and disease in each tree to optimize its growing ability. This is extremely time consuming and is wholly weather dependent so requires last minute decision making to be done. The pressures for completing this at times when labour shortages are well documented is even more imperative.
- 2.4. Similarly, consumer trends in variety preference have meant planting different varieties such as Gala from those previously favoured e.g. Russets and Cox. This has seen growers replacing orchards that have again not necessarily served a full life cycle in order to maintain contracts and meet the changing needs of the consumer. A recent example would be the Braeburn apple, which 5 – 10 years ago was understood to make up circa 20% of the demand from supermarkets.
- 2.5. Nowadays, this is believed to have reduced to about 5%, as varieties such as Gala which have a sweeter but comparably crunchy bite are favourable. This then means there is a surplus requirement of Braeburn stock on the market which in turn drives the price of the product down and therefore its viability. So, growers are either faced with the decision of continuing to grow into a market which has an over surplus (which in reality means continuing in an unviable manner) or grubbing orchards and replacing them with varieties which are highly in demand, and which are forecast to stay. This increases the pressure of labour demand, changes in variety and operational procedure which generally happen with increased levels of spontaneity and which require far greater levels of attention and management than ever before, to manage volatile commodity and labour markets.

- 2.6. The size, shape and colour of apples is also increasingly important to consumers and specific “grading” demands are put on growers by the supermarkets to grow particular classes of fruit; with optimum classes (e.g. Class I) commanding higher prices. Again, this puts added pressure on growers to, as far as possible, control the growth of apples on the trees. One of the main ways of doing this, is by controlling the level of water that can be available to a tree at certain times of the year and to achieve this, modern orchards require drip feed irrigation systems to be installed. Notwithstanding cost, this puts added pressure on the businesses labour to install these systems and to closely monitor them. These are monitored several times a day, early in the morning and late at night. Pipe leaks must be prevented as these, when added to particular weather patterns, can destroy the fruit on trees, whilst blockages and freezing must be prevented to ensure continuity of supply and to prevent crop loss.
- 2.7. Another way of controlling the growth of apples on the trees is to significantly increase labour levels in an orchard to thin trees more regularly and “train” fruit on the wires and to ensure orchards are harvested at optimum times. This improves the grading level of the end product but obviously comes with increased levels of labour demand and cost. Those businesses not giving such attention to their orchards are not being favoured by the supermarkets as the end product is not consistent (which is what ultimately sells with the consumer) and it is therefore becomes increasingly difficult to service and maintain supply contracts.
- 2.8. Understandably, this puts added pressure on farmers for the requirement for additional labour and the ability to make appropriate decisions based on specific weather patterns at short notice. This also means that appropriate management is needed to ensure that this labour can be utilised appropriately and the necessary monitoring undertaken.
- 2.9. The development of rootstocks, planting at closer densities and using wire networks all mean that yields per hectare are considerably higher than they used to be. However, more trees not only mean there is more stock to plant, thin and harvest (which means more labour), harvest volumes per hectare increase which mean the need for infrastructure to support this consequentially increases. This applies to:
- workers accommodation (where the industry norm is the provision of accommodation for the seasonal period to attract workers);

- the number of fruit bins;
 - the extent of buildings to store increased levels of equipment;
 - the extent of cold storage;
 - the extent of onsite water storage facilities and irrigation systems; and
 - the extent of grading and packing facilities (and areas associated with storage of packaging).
- 2.10. The recently released Food Strategy by the government seeks to ensure that the necessary infrastructure can be provided across all food production and processing sectors within agriculture. The strategy promises to ensure that the planning system will respond to the demands of the growing infrastructure at all levels. It is important to consider that this top level Food Strategy needs to give planning for food the support and policy platform that is needed.
- 2.11. Higher staffing levels across all of the labour intensive jobs requires greater levels of staff management. When you factor in that seasonal staff are principally made up of people from a number of different countries this can be even more time-consuming given language barriers and the time needed to train and monitor staff.
- 2.12. The reality is there has been a reduction in the ability to obtain and retain staff across the whole industry which has put extra pressure on existing staff to work longer hours as and when weather permits. In turn, this has stretched the management teams across the business and put extra emphasis on site management to operate efficiently and be able to respond immediately as needed based on the needs of the business and weather.
- 2.13. The Food Strategy acknowledges that there has been a significant shortfall in seasonal agricultural labour and that they need and will be putting measures in place to ensure that this can be increased. Whilst this is a welcomed initiative at a national level, on a more personal level within the AC Goatham & Sons business, time and care is being given to ensuring that the business can attract, retain, train and allow staff (whether that be seasonal or full and part time) to flourish. This can only be accomplished in environments which provide support and stability, whilst having people on hand at all times. This proposal would duly provide this.

Home Grown Produce

- 2.14. On the 30th October 2023, DEFRA released and updated their 2022 Horticultural Statistics. Although it is appreciated that this covers various sectors of the horticultural industry, certain elements expressly relate to the topfruit industry.
- 2.15. In the report it can be identified that, home produced fruit has risen in value from its 2021 figure to £1 billion, an increase of 9.5% compared to 2021, with production volumes also rising by 13% to 652 thousand tonnes).
- 2.16. The report prepared by DEFRA set out that “Home production contributed 15% of the total UK supply of fruit in 2021, down from the 2020 figure of 16%” As highlighted in the graph in Figure 2.

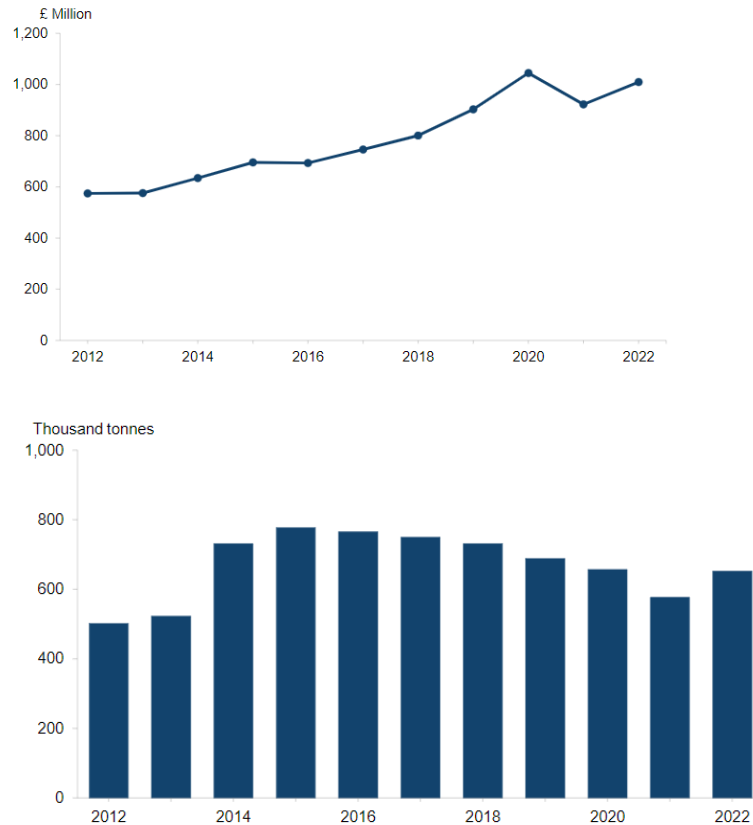


Figure 1 Graphs taken from the Horticultural Statistics released on 30th October 2023

- 2.17. DEFRA's 2023 report observed that *"The value of orchard fruit increased by 31% to £377m and soft fruit decreasing by 1.1% to £574m. The value of dessert apples increased by £28m to £183m in 2022, a 18% increase on 2021. The value of culinary apples more than doubled in 2022 to £94 million, with market prices increasing by 40% to £1.77/kg and yields increasing by 38% to 49 t/ha."*
- 2.18. The report also highlights *"The area planted for Cox apples continues to diminish at 715 thousand hectares, 14% lower than 2021 (835 thousand hectares) and 64% lower than the area planted in 2010 (1,993 thousand hectares). Cox orchards continue to be grubbed as consumer demand decreases, which along with the lower potential yield when compared to the newer varieties (e.g. Gala, Braeburn) means the area is expected to continue to decline in future years."*
- 2.19. When commenting upon the growing year, the report confirms that *"Unusual hot days in March and April brought the season forward for both top and soft fruit crops but it left them vulnerable to the late frosts in April which caused some damage. Harvesting of all fruit crops started early due to the continuing effects of the mild spring and the summer heatwave."*
- 2.20. Fruit exports (including re-exports) were worth £64 million in 2022, a 2.3% increase from 2021. Volumes of exports rose by 1.7% to 38 thousand tonnes (following the fall of 66% to 37 thousand tonnes in 2021, from 121 thousand tonnes in 2020).

British Grower Association Survey

- 2.21. The British Grower Association surveyed members of the British Apples & Pears Limited (BAPL) in the latter part of 2022. This survey (included at **Appendix 2**) has revealed a major retreat in future orchard investment given the state of poor returns within the industry. This has inherent impacts upon the ability to provide home grown top fruit to the consumer.
- 2.22. The survey was considered to represent an estimated 80% of the British top fruit growers, thus offering a trusted and thorough industry analysis.

- 2.23. The report indicates that 150,000 new apple and pear trees were cancelled for planting the 2023/4 season, with the original intention of investments for 480,000 new trees in orchards being cut.
- 2.24. The lack of planned ongoing investment is related to the lack of returns from the supermarkets. British Apples & Pears Limited executive chair Ali Capper explained that *“The key reason for the lack of investment is supermarket returns that are unsustainable. Increased input costs of around 23%, for example for picking, energy, haulage and packaging, are being met with almost static average fruit prices paid by retailers.”*
- 2.25. The average year on year increase in what supermarkets should pay the growers for their fruit has been recommended as 12% by an independent report by John Pelham for Andersons Consulting. The actual received increase by growers was 0.8%.
- 2.26. When comparing input costs increases of around 23% by the average increase of payment to growers by the supermarket of 0.8%, the significant shortfall of return is immediately apparent.
- 2.27. The executive chair Ali Capper of British Apples & Pears Limited as part of the report states *“This is the clearest indication yet that the future of apple and pear growing in the UK is seriously in doubt. The industry is on a knife edge. Without long term investment and new tree planting, orchards will quickly go into decline. That’s not something any of us wants, least of all the British consumer.”*
- 2.28. Alongside the dire figures demonstrating the industry grower crisis, the report sets out a number of key asks for different stakeholders; namely the government, retailers and consumers. These ‘asks’ are set out in the table below.

BAPL asks of retailers:

- A **reset on returns** to recognise the unprecedented **23% inflation in cost of production**. BAPL growers will be discussing fairness of returns with their customers in advance of electricity price changes
- **Long-term partnerships and prioritisation of British apples and pears over imports** to give growers the confidence to plant the orchards of the future with long-term contracts linked to inflation
- **To work with our great growers to reinvigorate the category** with in-store and online 'theatre', and packaging and messaging that attracts shoppers to buy British, and reflects the health benefits, affordability, low food miles and British provenance of our apples and pears

BAPL asks of government:

- To **add grower businesses to the Energy Business Relief Scheme vulnerable list** to lessen the impact on cold storage of fruit
- To **convene a meeting of retailers** to discuss the emerging crisis in the British apple and pear sector, seeking fair returns for growers
- To **remove the limit on the number of seasonal workers** allowed into the UK and increase the current permit to a nine-month visa
- To prevent unnecessary inflation by **removing the wage premium linked to the Seasonal Workers Scheme**
- To support the **development of renewables** (wind and solar), especially the storage of renewable energy to help mitigate the energy cost increases facing growers and reduce CO₂ emissions

BAPL asks of consumers:

- **Check the label and make sure you're always buying British apples and pears.** If you can't find them in your supermarket, ask your retailer
- **Eat an apple a day.** Keeping them in the fridge they store really well for at least two weeks and have excellent **health benefits**
- **Support local British farmers and lower your food miles** by choosing apples and pears grown in the UK

Figure 2 British Apples & Pears Limited 'asks'

- 2.29. These 'asks' as well as the growers survey highlight the pressures upon the top fruit industry and how drastic change and support is needed to ensure its survival. This support is needed from the top, with planning policy and decision making able to be at the forefront of this.

The Fruit Growing Season

- 2.30. Typically, the fruit growing season commences after harvest period - which is usually completed by the end of November - and will begin with the removal of old/dead or dying trees and their subsequent replacement with new stock through till early February.
- 2.31. The labour requirement during the planting season is high for a couple of months, especially during the early years when trees are being closely monitored to ascertain whether they are taking to their new environment.
- 2.32. Across the business, when new orchards are planted, the opportunity to incorporate the latest technology in drip feed irrigation is now taken; whilst the trees are now planted on a wire network to optimise growth and increase yields.
- 2.33. Pruning will occur post-harvest through to the end of March.

- 2.34. The main spraying cycle then commences from March through to the end of June as does the preparatory work in anticipation of the harvest period commencing in June and ending in November. This can include thinning but also the reinforcement and repair of wire networks.
- 2.35. The harvest period has the greatest labour requirement though the fruit season and it is during this time from May/June to the end of November that staffing levels will be at their highest both on the farms and in packhouse

3. Company Background

The Company

- 3.1. AC Goatham & Son are one of the largest growers of apples and pears in the UK. They farm over 2,400 acres of land all for top fruit (apples and pears) over 17 freehold farms and 13 farms rented on long term agreements across the south east. It is understood that 1 in 4.5 home grown apples and 1 in 3 conference pears sold in Britain is grown and supplied by one of AC Goatham & Son's farms or partner farms.
- 3.2. AC Goatham and Son have been trading for over 70 years (currently spanning three generations of the Goatham family). Over this time, they have focused on extending the fruit growing season to substitute foreign fruit with home grown fruit and producing quality produce at affordable prices. To achieve this, the business has introduced new varieties of apples to allow harvest to start earlier, improved growing methodologies to increase yields and introduced cutting edge cold storage technology to allow for fruit to be stored longer through the year.

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By Kevin White | 30 May 2019

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LOVELY ROYAL GALA

Figure 3 Extract from The Grocer (May 2019) reporting on AC Goatham and Son's introduction of UK grown apples being available in the summer as a consequence of improved cold storage being erected.

- 3.3. Retail customers are increasingly looking toward consolidated sites for distribution of fruit to them. Not only is this logistically easier to manage but it helps keep the overall cost of British fruit down so that it becomes affordable for the consumer. This allows it, from a price perspective, to compete with the imported fruit which is much cheaper to produce (even after factoring in import costs) due to differences in soil and climate conditions.
- 3.4. AC Goatham & Son reinvest heavily within their business to ensure innovation, quality and efficiency. In Medway alone £10 million was expended on the first packhouse at Flanders Farm. This reinvestment continued and following approval in 2015 another £10 million was spent in expanding the facility further. A further 17,010 bins of storage facility were approved at Flanders Farm at the end of 2018 which will see yet more investment amounting to somewhere in the order of £5 million. In 2020 a further cold store and packhouse were approved as part of another scheme of major development, which would store 10,500 bins of fruit. This scheme has been built out with over £5 million of associated investment.

- 3.5. The business was granted planning permission for a major development scheme at Swanton Farm in Maidstone in early 2019 for a storage facility capable of storing 20,000 fruit bins and adopting the latest technology. This project, in the Borough of Maidstone, was recognised as being of national importance. This has seen in excess of a further £5 million reinvested to support the businesses growing operation.

Fruit handling

- 3.6. Last year the business dealt with a throughput of circa 170,000 bins of top fruit (equivalent to circa 56,666 tonnes).
- 3.7. Based on existing planting with increased yields and forecast planting, this is set to rise to circa 187,500 bins by 2026.

Staffing

- 3.8. Last season, AC Goatham and Son employed in the order of 1150 staff across all of their farms and sites. Of this there are some 450 full time equivalent staff across the business with the rest being made up of the seasonal labour required to plant and thin trees as well as harvest and pack the apple and pear crops grown across the business. Given the recognised shortfall in labour the ability to provide workers accommodation on site, provides an attractive employment prospect which is needed to attract and retain staff, whilst importantly being needed to meet the functional needs of the business.
- 3.9. AC Goatham and Son continue to support extensive levels of staff training, including; training for:
- Food Safety,
 - First Aid,
 - Fire Marshals,
 - Vehicle Banksman,
 - Reach Truck, Fork Lift and Pallet Truck Driving,
 - iHASCO,
 - HACCP,
 - COSHH,
 - CDM Training,
 - Chainsaw,
 - Scissor Lift,

- PAT Testing,
 - Tractor Safe Stop,
 - JCB
 - PA1, PA2 and PA3 training.
- 3.10. AC Goatham & Son have also been working with Evergreen Training to offer apprenticeships to employees to encourage continued learning in the workplace, with all of the in-house training being accredited also. This ensures that the hard work and training undertaken by the workforce is recognised as they will gain accredited qualifications.
- 3.11. New Green Farm is being and has been planted with new orchard stock which comes at considerable cost (loosely estimated at £11K per acre or over £2.31 million for the 85 hectares farm), it is being planted with a number of apple varieties. The care of newly planted orchards requires intensive monitoring by experienced and more junior staff members. The ability for an experienced staff member to reside on site to manage the seasonal workers, staff members who work on site all year round as well as be responsible for the day to day overseeing of the farm to include, orchard walking, irrigation and spraying management.
- 3.12. Out of the 17 farms owned by AC Goatham and Son 9 currently have permission for or utilise managers dwellings on site. All of these farms contain worker accommodation on site, orchards and agricultural buildings, with some of these farms also containing cold storage. These are comparable to New Green Farm in that machinery is stored on site and workers are accommodated for up to or exceeding nine months of the year.
- 3.13. Of the ten remaining owned farms, three have immediate farm managers dwellings planned so that there is a manager on site all year round for the purposes of managing the workers, orchards and being on site in terms of security for machinery stores and cold storage. There are also plans to provide a larger farm manager's dwelling at Howt Green Farm, Swanton Farm and Flanders Farm. These farms all contain and have permission for seasonal farm workers accommodation and agricultural buildings and require a farm manager on site.

- 3.14. The seven owned farms that remain do not have any farm manager's dwellings on site because they only contain orchards and are smaller in area than the farms where the managers dwellings exist. This doesn't mean that there is no daily management of workers needed, but rather either it is not currently considered necessary to provide a farm worker on site all year round or that it is not the most pressing of current needs for the business (which is focusing on the assessment of need around where large work forces are present, significant investment has or is occurring or exists, where sites have had historic problems e.g crime/ trespass or where crop loss or failure to establish has the highest detrimental impact on the business). The business needs to prioritise funds and facilities where they are most needed.
- 3.15. New Green Farm has been heavily invested in recently in terms of new orchard planting and growth, which needs considerably more care and management than an existing more-mature orchard. The ability to have a senior member of the team on site to ensure that this care is given and monitored after such a considerable investment has been prioritised by AC Goatham & Son at this time, whilst the other farms are also being worked upon.
- 3.16. Previously, mention has been made of the fact that the various houses at other farms do not have agricultural occupancy conditions and are smaller in size. It is re-iterated again that this consideration does not preclude the fact that a farm manager is required at New Green Farm and that in order to attract and retain a farm manager, suitable accommodation is needed. The ability to provide accommodation is supported within the NPPF which also reinforces the ability to provide a rural worker's dwelling for someone who takes a majority control of a farm business. This application seeks to provide this with reliance upon the fact that it is essential for a manager to live at New Green Farm permanently for its management, to deal with emergencies and for reasons of security, all points which were recognised as being justified by the Inspector.

- 3.17. In early 2022 a fire broke out in a mobile home on another local farm managed by the application (see the pictures below at **Figure 4** and **Figure 5**). In the case of the fire, someone was on site and able to pick the matter up and manage the situation quickly. We do not wish to claim that having a dwelling on site would remove the risk of fire entirely, but being able to react quickly and manage the situation has reduced the impact of what could have been. In health and safety terms the provision of a dwelling on site greatly improves the chances of identifying these sorts of issues earlier and therefore give one every chance of keeping any possible damage to a minimum.



Figure 4 Photo showing worker's accommodation that was damaged by a fire.



Figure 5 Photo showing worker's accommodation that was damaged by a fire.

Worker's accommodation

- 3.18. AC Goatham & Son, as previously set out, operate on a hub farm system to support their numerous holdings, whilst also providing accommodation for farm workers and farm managers on as many as their farms as possible.
- 3.19. As set out on numerous occasions, having farm workers on site reduces the costs associated and negative welfare implications of transporting workers to and from farms, whilst also ensuring that workers can be on site for emergencies and respond to weather requirements.
- 3.20. The need to have managers on site to supervise the farm workers naturally follows this, so that suitably skilled individuals can be on hand to support, manage and deal with the day to day running of the farm.

- 3.21. AC Goatham & Son have recognised the requirement to offer and provide their workers, whether it be seasonal or senior staff members an attractive and beneficial remuneration package. For those in senior positions this can include a house on the site where they work, which also provides security, support and to ensure the effective operation of the farm.
- 3.22. In more recent years AC Goatham & Son have been actively seeking to provide more seasonal workers accommodation and amenity infrastructure as well as accommodation for senior workers with the approval of 3 houses on two different farms, with another being prepared for submission in the last 18 months
- 3.23. These manager dwellings ensure that there is suitably skilled agricultural practitioner on site where the agricultural processes require 24 hour attention to limit the potential for crop loss, to maximize yields, regularise fruit sizing, to manage and instruct the team on a daily basis, to walk the orchards ready for the next days instruction, to deter and prevent as far as possible crime on the sites, to manage the daily Covid protocol and ensure continuous compliance with rules, and importantly to act as point of contact for members of the public.
- 3.24. This application seeks to replicate this pattern, for one of the firm's Directors, at a recently purchased farm where inward investment for new and unique orchard stock has been considerable, criminal damage has already occurred on site and where monitoring from a senior staff member is of paramount importance.
- 3.25. Mr Ross Goatham, his wife and two sons currently live in Hoo St Werburgh which is approximately 8 miles away from New Green Farm by car, this is obviously not a distance where one is within 'sight and sound' to react to emergencies when they happen on site. Works to and decisions to be made about irrigation failures, weather conditions for spraying etc need to be made on site and normally without delay. The proposed dwelling is functionally situated to allow Mr and Mrs Goatham the ability to make these decisions and react to emergencies between them, whilst also still being within a 7-mile distance of the business headquarters if either of them needs to be there.

- 3.26. The Covid 19 outbreak and ongoing management in light of this has meant that, as with all other jobs, where work can be undertaken from home AC Goatham's staff are doing so. Where orchards can be managed on site, without the need for floating managers and the transportation of the workforce, this has been utilised. Providing a farm manager's dwelling at New Green Farm ensures that the farm can be appropriately managed. In order to be suitably distinct from seasonal workers, to offer suitable remuneration and to meet the long term need this is not provided in the form of temporary accommodation.
- 3.27. At New Green Farm, no such facilities or convertible buildings exists, so thought was given to the most suitable manager's dwelling and its occupier. The requirement for specialist monitoring at New Green Farm coupled with a lack of accommodation close by or on-site required AC Goatham to provide accommodation in the form of a new dwelling.
- 3.28. In these recent and currently difficult times, the decision was taken by the business for Mr and Mrs Goatham to take up residence on New Green Farm to cover the needs of the business (which would have otherwise only been occupied by another senior person) both to meet the needs of the business (they currently don't live on one of the farms but in Hoo St Werburgh).
- 3.29. They can closely monitor the orchard and the farms workings, whilst working from home for any additional 'business' requirements. Further and importantly their two sons take an active interest in the farm so being on site will enable them to learn their trade daily alongside their normal schooling with the ability to walk orchards, identify pests, learn optimum spraying conditions, picking and pruning techniques as well as irrigation management all from their home.
- 3.30. Flanders Farm is still accessible for any meetings or activities which require on site presence by Mr and/or Mrs Goatham.
- 3.31. The day to night management of orchards and cropping is undeniable and is set out in more detail in the coming sections, proving that it is essential for someone to reside on site all year round rather than just be a convenience.

4. Planning History

- 4.1. In January 2019 prior notification (with reference 20181247) was approved for the erection of an agricultural building at the holding, with associated hard standing, to store machinery and equipment (Tractors, Hedge cutter, Toppers, Mowers, Sprayers, Forklift Fruit Trains, etc) required to serve the holding. This was approved as there were no other buildings to provide secure weatherproof storage. This building has since been erected.
- 4.2. After erecting the building there have been several thefts and break in attempts at the site. These have included the following:
 - Diesel Bowser stolen (April 2019)
 - Theft of a roller and attempted theft of a 360 digger (19th May 2019).
 - At least one attempted break in to the mains electrical cupboard next to the tractor shed (July 2019)
- 4.3. A new access track and upgrading of an existing access on to Lower Road was approved with reference 20190164 in April 2019. This too has also been provided on the site.
- 4.4. Further to this there are six caravans for seasonal agricultural workers (submitted under application reference 20200457) which have been recognised as being permitted development on site. These units will serve some of the labour requirements on the site.
- 4.5. In 2021 planning permission was granted for the storage of these mobile homes in situ plus all associated operational development needed to provide hardstanding and a sewage treatment plant with reference 20210275.
- 4.6. When not occupied, the mobiles will remain in situ for three months where they should be monitored to prevent theft or vandalism of the units. With each unit costing circa £7,000 - £10,000 this is not an insubstantial capital cost to protect. When taken with the capital value of the building and its contents there are considerable assets on site which require monitoring and safeguarding as far as possible. The presence of someone on site all year around helps prevent this as far as possible.

- 4.7. In 2022 planning permission was refused for the construction of a dwelling to provide accommodation for the farm manager and their family including the provision of all associated landscaping, biodiversity enhancements and drainage infrastructure with reference 20210970. This application was also dismissed at appeal.
- 4.8. In 2022 planning permission was refused for the construction of an agricultural worker dwelling, including the provision of all associated landscaping, biodiversity enhancements and drainage infrastructure with reference 20221334.
- 4.9. In 2024 prior approval was granted for the erection of a cold store with reference 20240020. This cold store, measuring 12m in height was considered by the Council to be appropriately sited and suitably designed so that it would not harm the overriding open rural character or natural beauty of the landscape.

5. Pre-application advice

- 5.1. The pre-application advice that was issued by the Council considered the proposed agricultural farm manager's dwelling in relation to Gravesham Borough Council's policies, as well as national policy and guidance. An analysis of the compliance with these policies was provided by the Council, as well as a consideration of the additional information that would be required as part of any submission.
- 5.2. The Council considered that there would be adequate agricultural justification for the farm manager's house and that the size, type, design and location of the farmhouse would be appropriate within the Green Belt and landscape. However, subsequently the Council set out as part of the appeal hearing that the pre-application advice previously provided to the applicants cannot be relied upon as the officer providing the advice was junior and has now left the Council.
- 5.3. It is strongly upheld that the pre-application advice was signed off by the Council and as it is actively encouraged by the NPPF this is the advice that was relied upon by the applicants to draft their previous planning application submissions.

- 5.4. The feedback received from the Planning Inspectorate as part of the hearing and appeal decision that the proposal is justified in agricultural terms, but the siting and design of the proposal was not acceptable within the Green Belt, has formed the basis for the design of this application.

6. Proposal

- 6.1. New Green Farm was purchased by AC Goatham & Son as a land holding only, as the previous owners of the farmland retained the farmhouse which previously served it. This application therefore seeks permission for a new farmhouse for New Green Farm to provide onsite security and for the farms management. The farmhouse proposed has been designed to provide accommodation for the farm manager's family who are also employed by or involved with the farm enterprise of AC Goatham and Son and responds to the previous reasons for the dismissed appeal.
- 6.2. The farmhouse proposed will provide 4-bedroom family accommodation for the farm manager (a Managing Director of AC Goatham & Son and directly involved in the farming enterprise) and his wife (also a Director and employed by AC Goatham & Son and also directly involved in the farming enterprise), as well as their two sons who are taking an active interest in the business to become the fourth generation of this family run farming business. The farmhouse would provide on-site security and management whilst also ensuring that the Managing Director and his wife are able to bring up their two sons with a natural and hands on approach to the business; learning on the job as part of their everyday life. This will facilitate the 4th generation of the Goatham family working in the business in due course.
- 6.3. As part of the pre-application enquiry and previous submissions several locations were considered for a dwelling having regard to the location of the orchards, the existing building on site, proximity to neighbours, views of the dwelling from surrounding locations, proximity to the various site accesses, being central within the holding, site topography and given the obvious consideration for the future occupants in terms of light levels and outward views.

- 6.4. The location of the dismissed appeal, although dictated by the Council originally, was deemed unsuitable and would not be appropriate development in the Green Belt. This proposal seeks to provide a farmhouse of a similar design, whilst reduced in volume and in much closer proximity to the existing agricultural building and seasonal workers accommodation to ensure that the perceived impact upon the openness of the Green Belt is negated.
- 6.5. The design of the scheme has been amended to also ensure that the orientation of the building maximises overlooking of the buildings, farm and access from a number of key rooms whilst also providing a dedicated separate door for the farm office. This is in direct response to the Planning Inspector's analysis.
- 6.6. The proposed dwelling would be accessed via the existing access granted under application reference 20190154. This access is the main route used by large HGV's and farm vehicles, so the dwelling's location is well suited in this respect being close to the existing infrastructure. The dwelling would also be located to be in close proximity to the cold store facilities that are planned at the site, so that any emergencies and monitoring of the stores can be undertaken whilst being close at hand.
- 6.7. The proposed dwelling will contain four bedrooms, a farm office downstairs with an open plan kitchen and dining room, with a much-reduced floor space. There is a downstairs toilet and utility room, with upstairs hosting a family bathroom and 1 en-suite bathroom for the master bedroom.
- 6.8. The dwellinghouse would be finished in a high standard of materials to match the style of the surrounding properties and vernacular. This would comprise imperial handmade stock brick, spicer handmade clay tiles with purpose-built joinery with 12mm heritage glass panels above stone cills. Doors would be made from iroko wood with 12mm heritage glass, with the bi-fold doors being made out of timber on an aluminum frame.
- 6.9. Alongside the dwelling a driveway, parking area, native planting and softly landscaped garden is proposed. This includes a mixed English native hedge and chestnut post and rail boundary fencing.
- 6.10. The provision of a farm dwelling on site will not only serve as additional farm security, but it will more crucially meet the functional needs of the business in terms of labour demand and management.

- 6.11. The approval of the storage of the seasonal workers mobile homes onsite and in-situ when unoccupied as well as the provision of cold store facilities also brings a further requirement for a farm manager to reside on site all year round. The increased security that will be required when no seasonal workers are residing onsite, the requirement to respond to irrigation or weather emergencies, as well as deal with cold storage emergencies once these are built out.

7. Design and Access Statement

Use

- 7.1. It is proposed that an agricultural farm managers dwelling is provided on site to provide onsite security and most importantly management of New Green Farm which will house two of the businesses Directors and their family as detailed above.

Amount, Layout & Scale

- 7.2. The proposed farm manager's dwelling has been designed to provide four bedrooms, to provide accommodation for Mr and Mrs. Ross Goatham and their two sons, whilst also providing a spare room for family visitors.
- 7.3. The house will contain a farm office with separate access via the utility room for the shedding of farm clothes and boots, an open plan kitchen and dining room with a separate sitting room and living rooms as well as a downstairs toilet and utility room.
- 7.4. Upstairs four bedrooms are still being proposed with a family bathroom and the master bedroom having a wardrobe area for separate storage. As previously set out, the overall area of the proposed dwelling is much reduced in size by some 30% (a reduction of 81 square metres).

Appearance

- 7.5. The proposed farmhouse will have a handmade clay tile roof, imperial handmade stock brick, purpose made joinery with heritage glass above stone cils. The doors will be purpose made from iroko wood with 12mm heritage glass.
- 7.6. The farmhouse has been designed to a high standard with a high standard of materials used to provide a modern insulated home but with a traditional design. The use of stock bricks, clay tiles and the sash style windows with stone cils will complement the local vernacular.

Landscaping

- 7.7. The landscaping proposed at the farmhouse centres around the planting of native hedging as a boundary treatment around the garden, access and parking area.
- 7.8. The driveway will be formed out of bonded pea shingle on a tarmac base. This will be extended to the parking area and the bin store as well as for access to the house.

Access

- 7.9. The existing access that was approved under 20190154 and has been provided on site will be utilised by the farmhouse. The access has good visibility splays and no alterations would be required to facilitate the farmhouse. A small length of driveway would be added to the existing internal access farm tracks to provide access to the farmhouse from past the agricultural building.
- 7.10. It is considered that the proposal would not alter the type or amount of traffic that currently use the access, as the farm manager and visitors use the access at the moment; a residential use will not exacerbate this. It is considered that an onsite presence will in fact reduce the traffic movement of the site as management will be on site to deal with any issues as and when they arise.

- 7.11. All the above access elements have, following the first and second pre-application submission as well as the consideration of application 20210970, 20221334 and 20240020 been acceptable to the Council and KCC Highways and we would respectfully not therefore expect these to now feature as reasons for concern in this application.

8. Agricultural justification

- 8.1. There are many agricultural activities associated with top fruit (apple and pear) farming. These can be broadly split onto three different categories, including, but not limited to:
- General land management;
 - Farm Management; and
 - Orchard management
- 8.2. The various ‘subsections’ associated with the respective categories are then further expanded on below. Again, it should be recognised that this is not a comprehensive or exhaustive list.

General land management

- 8.3. There are many general farm operations that are required to be undertaken throughout the year. Included within these are:
- hedgerow management comprising replanting and cutting;
 - headland and field margin management to encourage biodiversity, retain accesses to fields and avoid undue erosion and compaction (to include mowing and spraying);
 - track maintenance to ensure routes remain adequate for vehicle accesses without undue soil erosion and the filling of potholes (fruit when picked is delicate so to optimise profit, movement should be limited when in fruit bins – hence the greater dependence on filling potholes);

- vermin and pest control;
- fence and gate repairs;
- building maintenance and ongoing repairs; and
- irrigation and land drain management.

Farm management

8.4. In modern agricultural businesses a great range of management activities need to be undertaken, this can include but is not limited to:

- Completing and partaking in fruit audits by customers (retailers) and by other Statutory and Non-Statutory bodies e.g The Rural Payments Agency, DEFRA, LEAF etc);
- Health and Safety Audits;
- Providing data retailers to report on forecast and actual carbon counting;
- Sourcing new equipment and machinery;
- Farm Accounting;
- Liaising with the packhouse, cold storage managers;
- General admin and marketing;
- Payroll Management (the business employs circa 250 full time staff and, in the region of 1000, other staff working through the year and on a seasonal basis);
- Planning spray programs and keeping spray records;
- Grant Scheme and Match Funding applications;
- Subsidy application though the RPA;
- Soil Audits and the preparation of Soil Management Plans; Fruit bin repairs (circa 10,500 bins for this unit alone by 2025);

- Liaison with staffing agencies as necessary to source additional workers depending on seasonal requirements;
 - Co-ordinating staff logistics – where needed to get additional staff to and from the site and between farms;
 - Co-ordinating fruit logistics – to get fruit to and from this site and other sites into stores;
 - Co-ordinating bin logistics (circa 10,500 by 2025) – to get bins to and from site and to and from packhouses depending on variety; and Co-ordinating machinery and equipment logistics – to get appropriate equipment and machinery to and from sites as needed; and
 - Taking and arranging daily deliveries to and from the farm for farm equipment, parts, fertilizers, tree stock, wire network, etc
- 8.5. Having a dwelling on site at New Green Farm will allow the early morning team briefing to occur on site to manage the orchard teams at New Green Farm and to respond accordingly to any on site management issues, whilst the applicant can, as far as possible, also work around these issues throughout the day to address the other needs of the business which can be conducted from the farm office to be provided in the dwelling. Then, once the conventional office hours are over Mr and Mrs Goatham together with their sons can continue to address any further site matters or management – which can often be, completing planting programs; training fruit; thinning trees, pruning, managing irrigation, finalizing spray responsibilities, mowing, harvest etc ready for the next day. Finally, the orchards can be walked so the applicant can then assess and prepare what needs to be done for the next day early morning briefing.

Orchard Management

- 8.6. There are several operations on site which require routine management, oversight and supervision across New Green Farm, together with all the unplanned farming practices that need to be undertaken over the Farm to ensure good farming practice, whilst ensuring as far as possible continuity in supply both in terms of quality but optimized quantity.

- 8.7. To ensure that fruit yields can be optimized and ‘grade outs’ at packing stage are kept to a minimum, orchard management on site is essential. The range of tasks vary throughout the year and will depend on the growth of the tree and of course the weather.
- 8.8. Ordinarily, orchard management operations will as far as possible be undertaken throughout the day, but of course there are many occasions when activities need to be commenced early in the morning or late into the night depending on weather patterns. For example, spraying may often need to be managed at unsociable hours when temperatures are reduced and wind speeds at a minimum.
- 8.9. As always in farming, the weather dictates what can occur and when. Other tasks associated with the orchard management include, but are not limited to monitoring pests and disease in the trees and fruit. It is important to inspect all trees regularly (at least once a week but ideally every other day) to pick up on any signs of detriment early so quick intervention can be carried out, as applicable. Apple canker observation is a good example of this. If spotted, Canker in trees should be dealt with immediately. This requires pruning or thinning back of branches to 15 cm below canker points and at times when the weather is appropriate. So thinning between period of damp or windy weather can be detrimental to the exposure of trees to canker, and thus the way to ensure it is kept out of orchards is daily observation of trees to then react soonest after Canker is spotted but in the right weather moment.
- 8.10. Mowing is a time-consuming operation for the business not unreasonably occurring on a weekly basis from March onwards. This can often occur late into evenings and must of course be reactionary to weather periods.
- 8.11. Tree thinning and topping is important to ensure and encourage optimum fruit growth for the year and indeed beyond that particular year. For example, a high blossoming tree, might forecast a lot of fruit. Whilst this might appear good, this is not necessarily the case. Orchard management is about the production of the right amount of fruit at the right size at the right time. Too much fruit can mean that the harvest will produce lots of smaller apples, which are not favored by the market and may also create logistic, harvest and storage problems. Whilst conversely large fruit in smaller quantities is not favored by the consumers and is therefore hard to sell.

- 8.12. This means that thinning at different times of the year is important and can even include thinning as soon as the blossom comes (which is for a limited window). Thinning is an art form and a heavy blossom thin will also have an effect on the quantity of fruit that the tree will produce the next year. Each tree therefore needs its own thinning attention, which over 167 acres is very time consuming, let alone when further consideration is given to the business's other holdings.
- 8.13. So whilst it is accepted the bulk of this work is undertaken by the seasonal staff, it still requires a high degree of expertise to ensure that this sort of operation is conducted properly – this requires the constant monitoring of the orchard and re-instruction and where necessary constant re-training of the seasonal workforce. This then requires vigilance when managing the team as the activities undertaken must be accurate and at optimum times.
- 8.14. Stake and wire replacement are important in tree growth and to ensure that the support system can offer the necessary support to the trees. As the trees grow and the weight of fruit increase this obviously puts extra strain on the supports which need to be monitored accordingly and repaired.
- 8.15. As the trees grow, they need to be trained on their support network and also pruned accordingly (whilst giving due regard to bud development at the same time) to create a “fruit wall” down the rows. This time-consuming operation improves the efficiency of the harvest not just in the immediate season but in seasons beyond. Again, whilst this work is largely undertaken by the seasonal workforce, it is imperative this is done properly as this can have significant impacts on the future of an individual tree and obviously an orchard.
- 8.16. Topping is also done in the fruit trees to reduce their height for the benefit of light filtration to the other rows (so as not to restrict sunlight and thus the growth of the tree and fruit) whilst also for improving the efficiencies at harvest. The aim is to ensure that orchard rows are ideally picked at no more than two height (i.e. the bottom half of the tree is picked at ground level, with the top half of the tree either picked from platforms or ladders) for reasons of time and money.

- 8.17. As the business grows eating apples and pears (rather than juicing), these are hand picked off the trees to reduce bruising and to offer the first part of the 'quality control' chain. This is obviously very time consuming and can require working long unsociable hours to get the job done as this window of opportunity is very weather dependent. Harvest can occur at short notice early in the morning and late into the night to avoid forecast rains, frost, winds and high temperatures. Again, whilst it is accepted that the seasonal workers do the bulk of this, supervision, vigilant monitoring of trees and the workforce (including assessing methodology or task operation) are important to intervene soonest if not being done right; and where necessary retraining, re-monitoring and constant correction occur repetitively at unsocial hours.
- 8.18. The irrigation lines need to be checked on a daily basis to ensure they are not just working to provide trees with water but to ensure that they are not leaking. Any leaks need to be fixed without delay to reduce water loss but to prevent overwatering of trees.
- 8.19. The on-site manager obviously needs to co-ordinate on a daily basis the operations that are being set for the team that day. On site presence helps to implement this, understand demands and respond to any emergencies. After the day is done, an assessment can then be made of the days progress and the orchards can be inspected to ascertain progress made and prioritized for the next day's operations.
- 8.20. The daily team instructions, daily operations (general, New Green Farm site specific, wider business and of course orchard specific at New Green Farm) and wider business management results in long days for Mr and Mrs Goatham who also try to balance life with their sons. Being able to reside on site therefore not just meets the functional requirement of the farm and wider business but as far as possible it supports a more favorable family environment. In turn this also has the added advantage of facilitating further learning opportunities to Master Arthur and Master Stephen Goatham respectively who can be 'taught the trade' on site ready for when they duly join the family business for its fourth generation.
- 8.21. All of these tasks, although undertaken by seasonal and other employees as well as by Mr and Mrs Goatham cannot be managed, understood and ultimately undertaken effectively without a manager on site to direct, manage and ensure quality control in all things. It is therefore essential to have a farm manager on site.

- 8.22. These various different aspects of general, farm or orchard management as well as the direct management of the workforce were all recognised as an essential agricultural need by the Planning Inspector.
- 8.23. As part of Appeal APP/K2230/W/23/3319080 the Inspector considered that the fruit trees need continued and regular monitoring, that can only ever be undertaken on site, to provide protection during winter months, pruning, individual irrigation and nutrition in the summer months and harvest specific assessment in the autumn. The Inspector also acknowledged that the variety of fruit grown varies when these tasks are required and implemented.
- 8.24. The Inspector recognised that although much of the work was carried out by seasonal workers, the need to have direct supervision on site of these workers is of paramount importance for the quality, success and yield of the crop. Where workers may not have a direct background in intensive types of fruit farming in their native land, this supervision is even more profound.
- 8.25. The Inspector concluded that *“Whilst the farming operation does not have livestock which can require round the clock supervision, I am satisfied that the nature and scale of the operation does justify a permanent residential presence on site to ensure the effective operation and security of the enterprise. The principle of the erection of an agricultural dwelling on the holding therefore accords with the provisions of paragraph 84 of the Framework and the guidance in the NPPG.”*

Security

- 8.26. Whilst the agricultural justification is considerable given the nature and scale of the agricultural work undertaken at the farm holding, the requirement for on site security is also an important aspect of the agricultural justification.
- 8.27. The extent and value of the type of equipment which is stored and utilised on site is an important consideration, which was also recognised by the Planning Inspector.

- 8.28. The Inspector acknowledged that *“I was also shown the nature of the equipment stored in the large shed. There was a considerable investment in specialist machinery and equipment for pruning and harvesting which was all used on this holding and was not equipment that was shared around from the other farms in the appellant company business. **There is a clear justification for a residential presence on site to help prevent crime** and the loss of this equipment and investment. There also appeared to be a need to respond to emergencies in such aspects as the delivery of irrigation and nutrition in the spring and summer seasons through the equipment installed inside the shed which supplies every tree.”* (our emphasis)
- 8.29. The proposal has been designed to be provided in closer proximity to the agricultural building, proposed cold store and seasonal workers accommodation to ensure that the residential presence can overlook, oversee and be within sound of any potential crime as a matter of prevention.
- 8.30. It is therefore put forward that the amended position of the dwellinghouse will ensure that the safety of the holding can also be improved, which is also an important agricultural justification.

9. Planning Policy

National Planning Policy Framework (NPPF)

- 9.1. The National Planning Policy Framework (NPPF) puts a huge emphasis on sustainable development with the economic objective of building a strong responsive and competitive economy by ensuring that sufficient land of the right type is available in the right place and at the right time. To support growth, innovation and improved productivity, this is achieved by identifying and co-ordinating the provision of infrastructure. The importance of the economics role of sustainability is also accompanied by the social and environmental aspects of sustainability.

- 9.2. Importantly the social objective of sustainability seeks to “*support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the **needs of present and future generations**; and by fostering well-designed, beautiful and safe places...*” (our *emphasis*). This application seeks to ensure that a business can function in the present as a functional need for an on-site dwelling exists, whilst also providing care and training for the future farming generation.
- 9.3. Paragraph 9 requires that the sustainable objectives “*should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.*”
- 9.4. Paragraph 10 of the National Planning Policy Framework says that, at the heart of the Framework is a presumption in favour of sustainable development. This is echoed earlier by Paragraph 7 which states: “*The purpose of the planning system is to contribute to the achievement of sustainable development.*” This proposal comprises sustainable development which is essential to AC Goatham & Son in being able to carry out their business and in a viable manner.
- 9.5. It is recognised that when considering what constitutes sustainable development in accordance with paragraph 11 of the National Planning Policy Framework, the policies in the Framework need to be taken into consideration as a whole. It is submitted that the proposed development at New Green Farm constitutes sustainable development and one which is of benefit to the agricultural enterprise.
- 9.6. For decision making, the presumption in favour of sustainable development means that, where development plan policies are out of date, permission should be granted unless any adverse impacts of doing so would significantly or demonstrably outweigh the benefits. The most relevant development plan policies of Gravesham Borough Council are not considered to be up to date given their drafting in 1994 and 2014 respectively. The policy guidance that they are based upon has been updated by the NPPF and NPPG, which should therefore be taken as the applicable and most up to date policies.

- 9.7. As set out below, the proposal is considered to comply with the policies set out within the NPPF and there are no significant or demonstrably adverse impacts that would outweigh the benefits of the proposal.
- 9.8. Paragraph 39 states *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”* Given the changes made to the proposal in response to the previous decision making, as well as the recognition that the Planning Inspectorate gave to the agricultural justification, it is considered to be clear that support should be given to this proposal. Given that this proposal would ensure that the economic, social and environmental conditions of the area would be supported by the provision of a farm manager’s dwelling at New Green Farm, it is requested that the sustainability components of this scheme are given due weight.
- 9.9. Paragraph 84 of The NPPF states that Planning policies and decisions should avoid the development of isolated homes in the countryside unless certain circumstances apply. In this case, the relevant section of paragraph 84 is sub paragraph a), which states:
- “there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside”*
- 9.10. In this case the essential need has been recognised by the Planning Inspectorate, with this need being clear and justified. Section 8 of this Statement sets out this agricultural justification and need in more detail. For brevity this essential need centres around:
- undertaking and managing the farming operations that are needed at New Green Farm on a daily basis (see section 8 above of agricultural operations for a more comprehensive list);
 - offer security at the site to prevent thefts, break in’s and acts of vandalism;
 - to be able to respond quickly to events such as fires that may occur;

- monitor the irrigation systems that are in place to ensure they are working correctly and are not leaking (causing potential damage to other trees);
- undertake headland and field margin management;
- be on site early in the morning to brief the farm workers on the days operations and continue to monitor progress throughout the day, assisting wherever necessary (whilst not taking away from the applicant's ability to monitor and run the rest of the business);
- work unsociable hours for spraying, thinning harvest etc to work around ad hoc weather patterns;
- walk the orchard at the end of each day to assess the progress made over the site, to assist in the preparation of the next morning's farm brief and to assess and monitor trees to deter against disease and predators (this will then inform the next day's operation);
- be on hand to act with emergency's where say frosts may be anticipated or hail storms are due – this may require crops to be picked last minute or considered for covering;
- to ensure that someone is on site throughout the peak season to sign in and sign out the different seasonal workers into their accommodation;
- to ensure seasonal workers are integrated well onto the farm with other seasonal workers from different cultural backgrounds and with language barrier;
- to oversee the training of seasonal workers to ensure they have adequate training for all the various tasks they are to complete e.g harvest, thinning, planting;
- to supervise and monitor the staff in their various agricultural activities to ensure they are correctly executing tasks, to ensure they work efficiently but to ensure they are happy and supported in their roles to maximise staff retention;

- where there are difficulties with seasonal workers due to lack of productivity, cultural disagreements etc to take any appropriate action quickly so as to prevent team upset. This can result in relocating staff between holdings which then requires the subsequent checking in and reintroduction of new staff into the team; and
- to be able to monitor fruit in store once the new stores are erected.

9.11. When considering the NPPG guidance in relation to Paragraph 84a of the NPPF a number of considerations are set out, namely:

- *“evidence of the necessity for a rural worker to live at, or in close proximity to, their place of work to ensure the effective operation of an agricultural, forestry or similar land-based rural enterprise (for instance, where farm animals or agricultural processes require on-site attention 24-hours a day and where otherwise there would be a risk to human or animal health or from crime, or to deal quickly with emergencies that could cause serious loss of crops or products);*
- *the degree to which there is confidence that the enterprise will remain viable for the foreseeable future;*
- *whether the provision of an additional dwelling on site is essential for the continued viability of a farming business through the farm succession process;*
- *whether the need could be met through improvements to existing accommodation on the site, providing such improvements are appropriate taking into account their scale, appearance and the local context; and*
- *in the case of new enterprises, whether it is appropriate to consider granting permission for a temporary dwelling for a trial period.*
- *Employment on an assembly or food packing line, or the need to accommodate seasonal workers, will generally not be sufficient to justify building isolated rural dwellings.”*

9.12. This proposal, like the previously refused and dismissed schemes, seeks to provide accommodation for a rural worker (and one that has majority control of a large farm business) to live permanently at or near their place of work in the countryside. Paragraph 84 of the NPPF actively encourages this, where there is an essential need.

- 9.13. Considerable care has been taken to demonstrate that there is an essential need for the farm manager to live on site, in the same way that they do on seven other farm holdings within the previously refused scheme as well as later within this supporting planning statement. This is summarised as the accommodation being provided on site to allow a suitably skilled and qualified person to be on hand to respond to all weather emergencies, irrigation faults, supervise and manage the work force whilst also providing year-round security.
- 9.14. This essential need was demonstrated to and accepted by the Planning Inspector as part of appeal APP/K2230/W/23/3319080. The Inspector concluded at Paragraph 32 when considering the planning balance that *“it is clear that the new farm horticultural business has made a considerable investment in the planting of new fruit trees and outlay on extensive machinery needed for the management and harvesting of the fruit. On the evidence put to me and my observations on site I am satisfied that in principle there is an essential need for a worker to live permanently on site, as described in the NPPG. As such a dwelling of an appropriate scale and siting would meet the exception test set out in paragraph 84 (a) of the Framework.”*
- 9.15. AC Goatham & Son are one of the largest growers of top fruit, owning and renting 29 farms. The input to the local and national economy is set out below in this section and extends to £26.8 million with this forecasting to rise to circa £39.9 million by 2028. It is therefore put forward that the business will remain viable for the foreseeable future and a temporary permission would not be suitable for a trial period, as there is no temporary nature to the orchards growth and applicants business model. Further, with it being accepted that 24 workers are needed at the moment on site for 9 months of the year, it falls that they of course require proportionate management for the requisite period; but that outside of this period when they are gone the farm still requires daily active management. Furthermore, the expansion of the land holding, which itself will require additional labour and the plans to erect a cold store mean that the need will be even greater.
- 9.16. There are no buildings on site which can be converted to dwellings, so this is not achievable in this instance as it has been for numerous other farms.

- 9.17. The farm currently lacks cold storage or fruit packing facilities but plans and approvals have already been made for the provision of new facilities. The farm manager's dwelling will therefore be required in connection with the provision of such facilities to ensure that the stores are functioning as required. A breakdown in the cold stores could otherwise result in an entire crop being lost, which in turn has the ability to affect the applicant's ability to deliver on their supermarket contract.
- 9.18. The proposed development will meet and provide facilities for the applicant's labour management requirements of its expanding agricultural enterprise and their aim to provide British apples and pears to the British consumer. This proposal therefore supports the local and British economy.
- 9.19. The NPPF requires that significant support is given to economic growth with paragraph 85 stating *"Planning policies and decisions should help create the conditions in which businesses can **invest, expand and adapt** [our emphasis]. Significant weight should be placed on the need to support economic growth and productivity, taking into account both **local business needs and wider opportunities for development** [our emphasis]. The approach taken should allow each area to build **on its strengths, counter any weaknesses and address the challenges of the future**. [our emphasis]"*. Of course in this case one of the significant weaknesses is already evidenced as being labour shortages, and the bringing on of the next generation of British farmers – two issues this proposal is able to help address.
- 9.20. It is quite clear that the NPPF places great importance on the contribution that agriculture makes to the rural economy and correspondingly provides support for its growth and expansion. The proposed development at New Green Farm will support the ongoing expansion and improved efficiency of a business which plays a significant role in the rural economy in Kent, the south east and nationally having regard to the top fruit industry.
- 9.21. Supporting a prosperous Rural Economy as stated within Paragraph 88 of The NPPF highlights that *"Planning policies and decisions should enable:*
a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
b) the development and diversification of agricultural and other land-based rural businesses;"

- 9.22. The provision of a dwelling on site would therefore be supported in policy terms by paragraph 88 points a) and b) as it assists in the expansion of this existing rural business making it possible to monitor and ensure optimum orchard growth and top fruit production and for the overall management of the land.
- 9.23. As previously set out and acknowledged by The Planning Inspectorate and the Council, AC Goatham and Son are one of the largest top fruit growers in the UK. Reinvestment in the business in the eight years ended 2018 has been £63.4 million through their whole business to ensure they meet the future needs of their staff, growers, suppliers and customers. Chavereys Accountants reported that in 2018 actual GVA for the business was £26.8 million; this is forecast to rise to circa £39.9 million by 2028.
- 9.24. This proposal is therefore hugely pivotal in being able to support the continued reinvestment of the business locally, however, this is limited if the applicant cannot manage the farm and it's staff effectively or provide the trees with the necessary husbandry attention during growth to optimize fruit quality and quantity.
- 9.25. AC Goatham & Son pride and have made a name for themselves on their ability to maximise yields and ensure quality. Given the reduction in the available spray products to blanket spray and deal with diseases or issues as a preventative, labour requirements have increased because signs of disease or problems need to be picked up early. The orchards are continuously walked, with senior management assessing each row or individual trees requirements so that irrigation, nutrition and spray applications can be tailored. The ability to react to very early or initial signs of disease, stress or canker from a senior management level can then be directed as an action towards the seasonal workers to ensure that these yields and quality is maintained. This proposal would therefore duly support the rural economy in a very meaningful way.
- 9.26. At paragraph 96(c) it is acknowledged that decisions should aim to achieve healthy, inclusive and safe places which support access to healthy food. The provision of accommodation to aid in the production, growth and harvesting of top fruit would duly support such vision and policy requirement.

- 9.27. Section 13 of the NPPF sets out the policies to protect Green Belt land. Paragraph 143 sets out that *“Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban re generation, by encouraging the recycling of derelict and other urban land.”*
- 9.28. Paragraph 152 National Planning Policy Framework sets out that inappropriate development should not be approved except in very special circumstances, due to the Green Belt designation. Paragraph 153 of the NPPF sets out that *“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”*
- 9.29. It is considered that the requirement for a member of the senior management (in this case specifically it is for the managing director and his family) to live on the holding to manage everyday farming, harvest and provide security provides the very special circumstances to justify a new dwellinghouse in this location.
- 9.30. It is acknowledged that the Planning Inspectorate recognised that this requirement at New Green Farm represented very special circumstances for a dwelling in the Green Belt. However it was considered that the design and position of the dwellinghouse would cause harm to the Green Belt which would not be outweighed by these very special circumstances.
- 9.31. The current proposal seeks to address the Inspectors concerns about this harm to ensure that the proposal is suitably sited and designed to ensure that the very special circumstances which exist outweighs any potential harm.
- 9.32. When considering the proposal in respect of the purposes of the Green Belt, the dwellinghouse has been proposed close to the existing and approved built form and farmyard at New Green Farm, whilst also ensuring that it overlooks two access’s to the site. The location seeks to ensure that all built development at the site is situated together, reducing countryside encroachment.

- 9.33. When considering this against the Green Belt's five purposes, it is considered that the proposal would not create a circumstance where sprawl would occur or that neighbouring towns would be at risk of merging into one another. The development proposed is situated within the open countryside and is not surrounded by or close to large built up areas. The addition of a dwellinghouse to essentially create a farmhouse adjacent to the confines of an existing farmyard would not create any form of merging between larger built up areas which it is remote from. Due to the site's position not being within close proximity to larger towns, the threat of sprawl is also removed.
- 9.34. It is accepted that the proposed dwellinghouse is within the countryside. However the positioning of the dwellinghouse will ensure that it will be viewed in the landscape as being part of the built form at New Green Farm. The position of the dwellinghouse has not only been designed to be functionally justified, it is also situated within a natural low within the topography of the landscape, further diminishing its potential impact.
- 9.35. Given the dwellinghouse's proposed position adjacent to the farmyard, it is put forward that this safeguards the countryside from encroachment. As the dwellinghouse is a justified addition to meet the functional requirements of the holding, it is considered that this position provides the best opportunity to ensure very special circumstances are met without causing undue harm.
- 9.36. As previously set out, the proposal is not situated within a town or urban setting, so therefore the purpose to preserve the setting and special character of historic towns will not be impacted in terms of the Green Belt. In addition New Green Farm's inherent requirement for a countryside location for the expanse of undeveloped land for top fruit growth could not be repeated or function as an alternative in an urban setting. Therefore the requirement to recycle derelict or urban land cannot be met by this proposal.
- 9.37. It is therefore put forward that this application represents very special circumstances, where the requirement to house an essential rural worker to manage a 85 ha top fruit farm outweighs any potential harm to the Green Belt. In addition, the dwelling will be an agricultural tied dwelling and is therefore represents a tied new building for agriculture. This fact was accepted by Gravesham Borough Council in their pre-application advice.

- 9.38. Paragraph 170 of the National Planning Policy Framework advises that inappropriate development in areas at risk from flooding should be avoided by directing development away from areas at high risk. The site is not located in an area which is at risk from flooding.
- 9.39. Recognition of the wider benefits of trees in the form of “natural capital”, “ecosystem service”, beauty, character and economic benefit is acknowledged at paragraph 180 of the NPPF. The proposal enables such support, as the management of labour associated with the business can ensure not only a managed landscape, but most importantly, a landscape which can be managed in a viable way – without which, management would not occur.
- 9.40. Importantly, paragraph 192 identifies the adoption of a strategic approach to maintaining and enhancing natural capital at “a *catchment or landscape scale across local authority boundaries*”; and that it exactly what this proposal delivers on. The proposal would ensure that the landscape can be managed in a way to ensure that it remains functioning, productive whilst also ensuring that habitats and biodiversity is maintained.
- 9.41. In rural areas planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs to promote rural sustainable development, housing should be located where it will enhance or maintain the vitality of rural communities. A location on site makes the farm operations possible which in turn ensures the countryside is maintained, people are employed and the landscape is producing a viable crop (which leads to the retained employment on site). It will ensure that the business owners can more readily service the wider needs of the business by limiting the time away from this principle farm they will manage.
- 9.42. The framework also requires that policies and decisions should contribute to and enhance the natural and local environment by protecting soils and also recognizing the economic and other benefits of the best and most versatile agricultural land and trees. It is maintained that the provision of proper management of said land will ensure that it is protected and its economics nurtured. In addition, as recognised by the Inspector, any soil and land disturbed by the proposed dwellinghouse would be spread and used at the holding as it is very much in a farm’s interest to ensure that this is not lost at a detriment to their crops.

- 9.43. Alongside this is the recognition that the whole 85 hectare holding lies within this Grade 1 land designation and therefore the provision of such a small disturbance of soil and land rather than any loss could not be re-designed. When considering the size of the holding and potential size of the disturbance the Inspector concluded at paragraph 27 that *“the loss would not be significant or material and there is no objection to the proposal on this ground.”* It is maintained that this should also be the stance that the Council now take.

Gravesham Local Plan

- 9.44. The Gravesham Local Plan is based on the first review which was adopted in 1994. In 2007 some of the policies were saved, this included Policy C10 relating to agricultural dwellings, the main consideration in this case. This policy makes and relies on policy which itself (Annex E of PPS7) has since been revoked as part of the NPPF.
- 9.45. Although this policy has not been identified as having “expired” in 2007 nor was it “replaced or deleted” in 2014 it is considered out dated due to its dependence on Annex E of PPS 7, which the NPPF has since revoked, and which has not since been supplemented in any of the NPPF updates or in the National Planning Policy Guidance (NPPG) documentation. It is therefore considered that the NPPF and NPPG take policy preference over this.
- 9.46. However it is acknowledged that some weight was attributed to this policy by the Planning Inspectorate as part of the recent appeal hearing. In light of this an analysis of the proposals compliance with this policy and appeal overview is provided for brevity.
- 9.47. Setting aside the references to outdated PPS policy, the broad principles of Policy C10 are met in the following ways. Under policy criteria (i) it is put forward that the Council and indeed the Planning Inspectorate have acknowledged that AC Goatham & Son business is commercially viable given its extent, position within the top fruit community and supply chain as well as specifically in terms of the investments already made at New Green Farm. The accounts, to confirm these points have not been required as part of any previous application or appeal. The large scale and historic nature of the business make part (ii) not applicable; the business is not an emerging one.

- 9.48. Sections 8 set out the requirements of New Green Farm for an agricultural dwelling as a necessity rather than just a convenience, which were also accepted and recognised by the Planning Inspector as part of the subsequent appeal. It is therefore considered that part (iii) of Policy C10 is met.
- 9.49. The fact that no housing is available or suitable within the immediate vicinity to serve the purposes of being within sight and sound at the farm has been agreed as part of every application and at appeal and the requirements of part (iv) are therefore met.
- 9.50. **Parts (v) and (vi)** have been given particular consideration as part of the preparation of this proposal, given that in essence the Inspector agreed with all of the justification of the proposal is terms of agricultural need but did not consider that the siting or design were appropriate.
- 9.51. The proposal has been designed to lie within the lowest part of the general site area to ensure that it is as hidden within the landscape as possible, whilst still being located close to built form so that the farm can viewed as a whole entity rather than ad hoc buildings. Whilst this also ensures that the position and impact upon the landscape is minimal, this also ensures that the building is within sight and sound of the existing building and proposed cold store, but access and wider holding too. The viewpoint drawings demonstrate this unequivocally.
- 9.52. The design of the proposed dwellinghouse has also been greatly reined back in scale and bulk to still provide the necessary accommodation for a family, but whilst also ensuring that this is functionable for a working farm. The farm office and utility room (in essence a boot room and place to remove outside farm work clothes) are linked together with an external door serving them, so that any farm operations not taking place within the farmyard, building or kitchen can be achieved within the office.

- 9.53. The size of the proposed dwelling is considered reasonably necessary to support the applicant's requirement for the need to manage this farm and the wider farm business together with the needs of the family. The dwelling's location and design have been considered to limit the perceived effect on openness, which having regard to the NPPG includes giving consideration to spatial and visual aspects, duration of the development and the associated degree of activity e.g. highway, which in this case will be reduced as a consequence. Despite this, and our view that there is no adverse harm, the NPPG recognises ways in which perceived harm may be offset. This includes the provision of new green infrastructure, woodland planting, landscape enhancements, natural capital, improved biodiversity; all of which are delivered as a consequence of being able to continue to manage the orchards on this farm.
- 9.54. The design and materials of the dwellinghouse, which the Council and Inspectorate have been content with have been kept the same as this is in keeping with the neighbouring farmhouses and buildings across the immediate locality. It is therefore considered that this proposal complies with Policy C10.

Gravesham Local Plan Core Strategy

- 9.55. In September 2014 Gravesham adopted their Local Plan Core Strategy. This document recognises that agriculture is an important activity in Gravesham, occupying more than 70% of the land of the Borough.
- 9.56. Paragraph 2.7.1 recognises that Gravesham has the smallest economy in Kent, whilst having a slight fall in employment at the review period. Paragraph 2.7.2 goes on to recognise that Gravesham has relatively high unemployment compared with Kent, the south east region and nationally. The Core Strategy goes on to recognise that the lack of jobs leads to high levels of out commuting. This is why at 2.7.5 it is recognised that there is the need to improve the skill of the workforce and provide a greater number of jobs. The proposal would of course offer the opportunity for employment within the Borough on site.

- 9.57. The opportunities presented to the borough are set out at paragraph 3.2.9 of the Local Plan Core Strategy, with the Council claiming that by 2028, *“The character of the countryside and the diverse rural landscape will have been conserved and enhanced. Proposals that promote the appropriate expansion and diversification of the rural area economy will have been supported.”* Supporting proposals like this one are considered to be exactly what Gravesham need to do, to meet their claimed ambition in conserving and enhancing the landscape through continued farming and investment in the local economy in further job provision.
- 9.58. Again, the Council makes claims of wishing to respond to the challenges of climate change at paragraph 3.1.9, and the planting of this holding with trees will certainly help contribute to improving air quality whilst providing additional benefits to wildlife and protecting the landscape. However, in order for such a beneficial landscape to exist, it must be managed and to manage it appropriately and in a viable manner requires an onsite presence; one that is achieved with this dwelling.
- 9.59. Section 5.1.22 of Gravesham Borough Council’s Local Core Strategy identifies that there are few major employment sites within the rural area and supply within or adjacent to the rural settlements, tend to be dominated by small sites. However, such sites do facilitate sustainable lifestyles by providing opportunities for people to live and work locally and they also help and support the delivery of local services. The provision of a dwelling on site is an exact endorsement of this point, supporting a live work unit but ensuring the delivery of local service and the long-term management of the countryside.
- 9.60. Policy CS07 considers Economy, Employment and Skill. Of particular relevance in this policy is paragraph 5.1.37 which sets out that *“The Council will support proposals that promote the appropriate expansion and diversification of the rural area economy.”*
- 9.61. Paragraph 5.7.18 recognises the provision and retention of trees as being important. This proposal safeguards the provision of such, with Policy CS12 (Green Infrastructure) highlighting *“opportunities to enhance, restore, re-create and maintain habitats will be sought ...The overall landscape character and valued landscapes will be conserved, restored and enhanced. The greatest weight will be given to the conservation and enhancement of the landscape and natural beauty.”*

Draft Development Management Policies Document (DDMPD)

- 9.62. Currently at the Regulation 18 stage, the Council are hopeful that this document together with the Local Plan Core Strategy will update and complete the Local Plan in due course. This document identifies several policies which may, in due course be of relevance; although it is of course recognised that they are not yet formal policy.
- 9.63. Section 2 of the DDMPD considers Green Belt policy and in turn relates to the NPPF (discussed above). It recognises that development relating to agriculture is not considered to be inappropriate development in the Green Belt.
- 9.64. Paragraph 2.2.1 recognises that “*agriculture and forestry remain an important part of the rural economy that the Council continues to support*”. Policy DM1 recognises that new development related to agriculture will only be supported where it is reasonably necessary to sustain the agricultural enterprise to which it relates. Such is the case with this proposal as detailed in this submission. Similarly, when designing the proposal consideration has been given to the location of the proposed development to ensure its most suitable location having regard to functionality, security but of course to also minimize any perceived harm to the Green Belt.
- 9.65. Section 2.3 of the DDMPD considers the provision of new agricultural dwellings in the countryside referencing paragraph 55. However, the NPPF has since been updated and the relevant consideration should in fact be given to paragraph 84 as identified above.
- 9.66. The Council’s proposed Policy DM2 considers ‘very special circumstances’ as being a consideration. It is considered that the functional requirement for such a dwelling at New Green Farm is a very special circumstance as set out above.
- 9.67. Proposed Policy DM2 considers whether alternative arrangements are available rather than providing a new dwelling. However, it is considered that there are none. There are no buildings on site that are suitable to meet the need or for conversion, there are no properties available locally that would meet the need, as, the need is to reside on site.

- 9.68. The duration of the need is queried by proposed Policy DM2 and whether this is likely to persist in the future. Having recently bought the site and having invested heavily in it to date, the intention of the applicant is clear. Whilst the fact that the crop takes a while to come to fruition after considerable management and over time increases yields, the functional need remains. The addition of further land and now the cold store facilities will also make this need even more profound and again demonstrates intention.
- 9.69. Proposed Policy DM2 sets out that where there is any doubt as to the established need in the future it may be beneficial to provide a temporary unit of accommodation in the first instance. We do not consider there to be any question of doubt, based not only on the investment already made on the site, but by the size and reputation of the applicant's business as one of the largest top fruit producers in the country and given the longevity of the crop planted which needs management.
- 9.70. It is accepted that an agricultural occupancy condition may be necessary to make the development acceptable.
- 9.71. Proposed Policy DM9 looks at agricultural land, recognising that development on land will only be allowed where there is a considered overriding need. This proposal to support the continued management of the surrounding agricultural land is considered acceptable.

10. Other material considerations

- 10.1. The proposal site lies within 6km of the Thames Estuary protected sites and therefore in line with the Council's adopted strategy a mitigation payment is required to ensure that any development can mitigate the potential impacts for over-wintering and migrating birds.
- 10.2. The applicant has paid this financial contribution to the Council for the provisions of mitigation in the form of Strategic Access Management and Monitoring (SAMM) as part of appeal APP/K2230/W/23/3319080 in accordance with the Council's adopted strategy. It is therefore considered that this payment will suitably mitigate any potential impacts in line with the Council's approach.

Towards a one nation economy: A 10-point plan for boosting productivity in rural areas (August 2015)

- 10.3. In August 2015, the Chancellor together with DEFRA released a paper designed to boost productivity in rural areas and recognising planning as a barrier to rural businesses.
- 10.4. In this document it is set out that the government's overall framework for raising productivity is built around two pillars:
- Encouraging long-term investment in economic capital, including infrastructure, skills and knowledge;
 - Promoting a dynamic economy that encourages innovation and helps resources flow to their most productive use.
- 10.5. This proposal clearly supports and indeed underpins the longer-term investment that has been and will continue to be made by AC Goatham & Son. If this proposal is not supported it will impinge upon this.
- 10.6. This proposal also supports innovation through the growth of new fruit varieties and using innovative planting methods.
- 10.7. A farm manager's dwelling clearly helps AC Goatham & Son perform at their most productive, and this encouragement, coming from central Government must be given due consideration.
- 10.8. Page 14 of this Government report recognises that:
- "employers in rural areas can face particular constraints in accessing the pool of skills they require. According to survey responses, businesses in rural areas are more likely than businesses in urban areas to have to outsource work, withdraw from markets and experience delays in developing new products and services as a result of skills shortages".*
- 10.9. The presence of the dwelling prevents delays in services being delivered as AC Goatham & Son can support the needs of the business. The ability to house a manager on site will ensure that someone is always there to oversee farm operations day and night, as well as any essential emergencies, whilst also having the provision of separate space.

The Food Strategy

- 10.10. The Food Strategy report, as briefly alluded to earlier within the statement, recognises that the food industry is the largest manufacturing sector in the UK, that offers employment, opportunity, investment and they give local areas a sense of pride and identify; going on to highlight the key point that *“None of our food manufactures could succeed without the farmers and fishermen who supply them with high quality produce”*. Our client, the applicant, being no such exception. The report recognises that *“there is more to be done with the government and industry working in partnership on a shared endeavor to promote healthier diets”*. Something that the provision of a farm manager’s dwelling would contribute to.
- 10.11. In the summary of key measures of the Food Strategy the government sets out that to deliver Objective 1 (A prosperous agri-food sector that ensures food supply in an unpredictable world and contributes to the levelling up agenda through quality jobs around the country) the government will *“support farmers to broadly maintain levels of domestic production through productivity gain.....enable growth in key sectors, including horticulture.....ensure the agri-food industry has the necessary skills to take advantage of new and emerging innovations”*; all things that this application would seek to achieve.
- 10.12. Approval of this proposal would wholly support Objective 2 of the Food Strategy which is *“To deliver a sustainable, nature positive, affordable food system that provides choice and access to high quality products that support healthier and home grown diets for us all”*. The proposal also supports the applicant in being able to meet Objective 3 of the Food Strategy which is *“To deliver export opportunities consumer choice”*.
- 10.13. The Food Strategy recognises that *“To further build the UK’s resilience to future crisis and shocks, we continue to monitor and strengthen the resilience of our supply chains and support our domestic production.....Going forward, we will engage with industry to understand and address barriers to uptake of risk management or other farming insurance products, recognising that effective business planning is a key enabler of resilience at the individual farm level”*. It is such recognition of safeguarding against risk management and trying to be resilient that is the consequence of this proposal made by AC Goatham and Son and one that should therefore, respectably, be looked on favourably. Such support for the application would meet the reports aim to *“reduce the offshoring of food production to countries that do not meet our high environmental and animal welfare standards”*.

- 10.14. It is identified that *“our resilient food supply will therefore rely on a competitive and productive domestic sector, including increased output in sectors with sustainable growth opportunities such as horticulture ...”* something approval of this application would wholly endorse.
- 10.15. It is further set out that *“Another part of supporting a thriving farming sector is to ensure that the animals and crops we keep and grow are healthy and well cared for, which also benefits the health and welfare of our own population”* – the applicant’s proposal helps achieve this facilitating greater levels of care in the growth of the top fruit crop.
- 10.16. The government has already announced the expansion of the Seasonal Worker Visa Route to 2024 and this is expressed as part of the *“Levelling up the food system by maximising growth opportunity”* part of the report. Following such an observation it is set out that *“Taking advantage of this [the Seasonal Worker Visa Route], we will work with growers to develop a world leading horticultural industry”*. Respectfully, if this aspiration is to become a likely reality provision needs to be made for those businesses already seeking to innovate within the horticultural sector such as AC Goatham and Son and who require support within their existing farming operations.
- 10.17. Further, in recognising that *“the sector cannot sustainably rely on migrant labour, especially in light of global pressures elsewhere, the government will also in the coming weeks commission an independent review to tackle labour shortages in the food supply chain”*. This acknowledges the problems encountered in the existing system, which of course draws on the logistical problems the applicant has in sourcing labour. Whilst it is accepted that on site accommodation will not resolve the seasonal labour need, it does facilitate its better and easier logistical management being on site, whilst ensuring a happy work force can be overseen on site to provide every chance of retained staffing.
- 10.18. The aspirations of the Food Strategy to ensure food manufactures and providers *“have access to government support for innovation”* and to *“drive greater confidence, uptake and investment in new technology [in which we would also include new crop varieties]”* is admired; but the real proof will be on the actual ability to deliver on aspirations such as this – with the current proposal being one such example of support.

- 10.19. There is a most comprehensive and extensive section in the Food Strategy about “Healthier and Sustainable eating”, which highlights the current problems associated with obesity and lack of fresh fruit and vegetable consumption. The report goes on to clearly highlight that *“government needs to set the right expectation of industry, provide the right regulatory interventions, and support the necessary innovation to drive a healthier food environment”*. Supporting this planning application would contribute to delivering this, as the applicant can better safeguard both the quantity and quality of the fruit they grow, helping to make this more available to the market. Obviously, the greater the quality and quantity of market produce the more the cost to the consumer can ultimately reduce which should make healthy apples and pears more available to a wider range of consumers. This would clearly align with paragraph 2.1.11 that sets out *“Nutrition and sustainability are interrelated – we should not tackle either in isolation. The measures we now set out are aimed at supporting better informed food choices with the dual objective of shifting consumes towards healthier and more sustainable choices and promoting a supply response from the food industry, where food production and consumption become healthier and more sustainable”*.
- 10.20. Respectfully, if the government is committed to deliver on the conclusion of its food strategy, namely: *“This food strategy sets out government ambitions and priorities to create a more prosperous agri-food sector that delivers healthier, more home-grown and affordable diets for all, regardless of where people live or their income. The strategy identifies a number of measures to achieve this (summarised in the Executive Summary), targeting a variety of factors across the entirety of the food supply chain”*; then proposals such as those set out by the applicant must be supported.

Rural Planning in the 2020's

- 10.21. Released in July 2022, this piece of work was been endorsed by the President of the RTPI who sets out in his foreword *“I recommend anyone with an interest in the past, present and future of our rural communities uses the report as a **cornerstone of their work**”* [our emphasis]. The report goes on to recognise that *“Brexit is having most acute impacts in the farming sector”*, whilst *“changes to global climate are affecting growing seasons, in turn impacting upon the farming sector”*. In turn this sets out in the Executive Summary how *“this can lead to a need for more accommodation for seasonal workers, and/or more structures”* in areas where planning policy tends to restrict development. This only serves to recognise how the proposed accommodation is serving a growing need in an already very difficult industry with a high dependence on recognised seasonal worker presence.
- 10.22. It is recognised in the report that *“Planning needs to balance a myriad of competing claims in rural space, from housing through to habitat protection, flood management, biodiversity net gain and tree planting, to the effective management of landscape designations and the promotion of economic diversity.”*. As set out in the submission the proposal helps achieve this balance – a continuous presence on site of course means that this such activities can be given their full attention and appropriate times of the day and night depending on the needs of the orchard, the wider habitat of the farm and of course all the while working around the unpredictability of weather patterns which can mean most unconventional hours. This results not just in food production, but better landscape management and of course improved efficiency of the farm business.
- 10.23. The report sets out that *“Rural planning has a clear role to play in realising the **adaption potential of rural areas** and **supporting innovation** [our emphasis]”*. On behalf of our client, we have, relating to this application, set out how the need to be on site to support a new variety of apple being grown to fill a market hole in UK provision – in other words, innovation in the sector, which should clearly be supported.

- 10.24. In the key findings section of the report it is highlighted that *“Brexit has implications for the seasonal workforce whilst climate change will impact on growing seasons and the choice of crops. The combination of these factors will have implications for seasonal accommodation demand, placing new pressures on the housing stock”*. Whilst we are not claiming that the need for permanent residency is derived just from Brexit or Climate Change, the requirements are only further emphasised, as logistical management of seasonal workers and the corresponding agricultural activities are only becoming even harder to address with such prevalent factors. Thus, meaning the proposal is in effect serving a need that is being increasingly recognised as being more problematic.
- 10.25. Among the various other key findings it is set out that there is a *“30% reduction in the number of English Farms since 1990 and a corresponding increase in average farm size.....Brexit is likely to accelerate this rescaling of farming, with implications for the number, type and configuration of farm buildings and workers’ housing”*; something the applicant is witnessing. In economic terms the key findings set out that *“The only certainty is that **farming faces a period of acute uncertainty**”* [our emphasis]; only serving to demonstrate the need to support the application which allows the applicant to, as far as possible, control the management of their farm operations and fruit production to, as far as possible, safeguard against uncertainty. In further economic terms the report sets out *“...**planning will need to adapt to and support emergent economic realities**”* [our emphasis], with no finer example being set out in the applicant’s situation where there is significant economic pressure to not only ensure the success of a new apple variety, but to safeguard the journey to market by optimizing yields - which has the knock on effect of contract fulfilment with the supermarkets (failure of which results in fines or a lack of contract renewal in the future which clearly has major impacts on the industry) and the applicant’s farming business and the people it employs.
- 10.26. Having regard to the key findings relating to climate change the report recognises the variation in cropping times *“which affects the supply of foodstuffs and brings farmers in to competition with producers in other parts of the world. The **desire** by farmers **to maintain consistent supply, and protect crops from extreme weather, is driving increased demand for structures**”* [our emphasis]. This resonates exactly with what is being experienced with the applicant and in this case the demand for a house on site.

- 10.27. In looking at the impacts of Covid 19 on the rural environment, the RTPI report rightly highlights that *“emerging evidence suggests that many rural places are among the most vulnerable to Covid 19 health risks”*, with no exception being drawn in the case of this application as the report further identifies that *“a high share of the rural labour force is in essential jobs (e.g agriculture, food processing) coupled with a limited capability to undertake these jobs from home”*. This puts an extremely strong emphasis on the need to be at one’s place of work as a rural worker, which is exactly what this proposal is seeking to achieve.
- 10.28. The changing demographics of the countryside section of the report highlights some key points about the way in which young people perceive and are involved with the rural economy. In short it recognises that the average age of farmers has risen to 59, whilst also identifying that the lack of young people choosing to take up agriculture is a huge challenge to the sector. It is therefore re-emphasised how it has been set out in the application that this proposal greatly facilitates the growth and development of a next generation of farmers (in this case the applicants two sons) thorough learning on site which should not be discouraged; to the contrary, given the evident decline in succession it should be encouraged; which is made possible through this proposal.
- 10.29. In drawing its conclusions this RTPI report highlights that *“A more ‘balanced approach’ would start with an assessment of particular circumstances and needs, and consider the merits and contributions of development”*, and we would therefore urge the Council to reconsider this re-application in this manner whilst also taking heed of the RTPI reports point that *“National policy and local practice may need to be more flexible, in terms of judgements it makes over the merits of proposal, such as their form and location, in instances where they clearly deliver wider public benefits”*. In this case such public benefits have been highlighted on multiple occasions and include, but are not limited to, safeguarding food provision, encouraging self-sufficiency and less dependence on the need to import; supporting a business who are seeking to extend the English growing season as far as possible, support a business who is seeking to introduce new varieties of apple with longer shelf life; educating a next generation of farmers and managing an active farming landscape to provide not just food but environmental gain.

10.30. In conclusion, the release of both The Food Strategy and the Rural Planning in the 2020's paper both highlight the direction of travel that is planned and needed within the agricultural sector, with many of the ambitions being achievable where greater support can be given to those in the industry. In this case this is obtainable through supporting the planning application presented to the Council.

Labour shortages in the food and farming sector'

10.31. What has become even more apparent since Brexit, Covid and now the war in Ukraine is just how difficult it is to get agricultural workers. This point has been further supported in the report prepared by The Environment, Food and Rural Affairs committee to the House of Commons on the 'Labour shortages in the food and farming sector' on 29 March 2022 and published on 6 April 2022. This report highlighted a number of key points, which are summarised below:

- *"The food and farming sector has been suffering from acute labour shortages due principally to Brexit and the Covid-19 pandemic. In August 2021, the number of vacancies was estimated to be 500,000 out of 4.1 million roles in the sector.";*
- *"We found that labour shortages across the sector were causing crops to go unharvested anddisruption to the food supply chain's just in time delivery model";*
- ***"The Government needs to make a step change in how it engages with industry, taking seriously the concerns they raise and acting promptly on them – this should help prevent any future intervention being "too little, too late" [our emphasis];***
- ***"The Government must work with industry both to tackle the immediate labour shortage facing the sector and to develop a long-term labour strategy that combines the development and deployment of new technology with attractive education and vocational training packages to entice British-based workers" [our emphasis];***
- ***"We conclude then (as we do again now) that much more needed to be done to attract domestic workers" [our emphasis];***

- *“Witnesses also made clear the significant toll [morale and well-being] these [labour] shortages were having on those still working in the sector.”;*
- *“...the food and farming sector did not have access to the abundant supply of domestic labour that had been expected”;*
- *“Covid-related shutdowns had, in some ways, been helpful to the food industry as it had released people from other sectors to work in food supply chain jobs. They [The Provision Trade Federation and the UK Seafood Industry Alliance] added that, once the economy had begun to recover from the pandemic, “the underlying stresses and strains within the system have become both more visible and more acute”;*
- *“The evidence we have received leaves us in no doubt that labour shortages, caused by Brexit and accentuated by the pandemic, have badly affected businesses across the food and farming sector. If not resolved swiftly, they threaten to shrink the sector permanently with a chain reaction of wage rises and price increases reducing competitiveness, leading to food production being exported abroad and increased imports. We are also extremely concerned about the impact this is having on the well-being and mental health of people working in the sector.”;*
- *“We cannot find people and all we are doing is poaching one another’s staff”;*
- *“The Food and Drink Federation noted that “margins in the UK’s food and drink supply chain are extremely low” so high operating costs – such as increased wages will have to be passed through the supply chain and onto consumers”. The National Farmer’s Union highlighted that this would result in “demand destruction for domestically produced product in favour of imported product, which has much better access to labour””;*
- **“The Government should not have been “waiting for the data” before taking any action. It should have had contingency plans to mitigate the fairly obvious risks and developed specific measures far sooner in response to first-hand accounts being provided by the sector. The whole Government needs a step change in how it engages with industry, taking seriously the concerns they raise and acting promptly on them” [our emphasis];**

- *“The NFU’s horticultural survey for the peak month of July which showed a “34% shortfall in available labour”;*
- *“in 2021 two-thirds of such visas [Seasonal Worker] were issued to Ukrainian nationals and 8% to Russian nationals”;*
- *“At present, many British workers are not strongly attracted to roles in the food supply chain, particularly seasonal work”;*
- *“the sector needs to shift its focus away from immigration and toward domestic workers....While not able to deliver results overnight, a greater focus on the development and deployment of technology combined with **attractive educational and vocational training packages to attract British-based workers** reduce the sector’s dependence on overseas labour.” [our emphasis];*
- *“The evidence we have taken leaves us in no doubt about the seriousness of the issues facing the food and farming sector caused by labour shortages. These include food security, animal welfare and the mental health of those working in the sector.” [our emphasis];*
- *“The Government must radically shift its attitude and work together with the sector to devise solutions that speedily help address the problems it faces, in the short term, medium and long-term to help the UK’s food industry and enable it to thrive. Failure to do so risks shrinking the sector and leading to higher food inflation at the price of the UK’s competitiveness, thereby making the country more reliant on food imports as we export our food production capacity – as well as the jobs it supports – abroad”;*

10.32. What is apparent from The Environment, Food and Rural Affairs committee report to the House of Commons was that before the Ukrainian war, circa 74% of the seasonal worker workforce were made up of Ukrainians and Russian’s. What is therefore acutely apparent is that what was undoubtably a difficult situation pre-war has now become obscenely difficult to work in. This has not only created a greater reliance on existing staff (including managers) doing more on site between less people over longer days; but it puts extra pressure on the business’s Directors to retain existing staff, to ensure maximized efficiency in delivery outcomes and ensuring a harmonious level of comradery and work ethic among existing workers.

- 10.33. The significant shortfall in the usual labour sources has resulted in having to explore other employment streams alongside other competing industries. This has led to employing staff coming from a greater number of countries from around the world which increases the problems associated with language barriers, cultural differences, staff loyalty and concerns relating to those that are less familiar with the agricultural tasks required of them.
- 10.34. As a consequence, this increases the level of onsite support to manage teams of workers, resolve disputes, supervise closely, implement operations and provide increased levels of training. Furthermore, it appears well documented that the level of uptake by British workers of agricultural jobs is diminishing whilst it is clearly set out that *“The whole Government needs a step change in how it engages with industry, taking seriously the concerns they raise and acting promptly”*.
- 10.35. The provision of an onsite dwelling not only provides an attractive and necessary package to offer enticement of British workers, it is seeking to provide an environment that encourages and facilitates the growth of the next generation of British farmers and all the while offering and serving a functional requirement that ensures the daily agricultural tasks that are necessary can be undertaken to the required standard as and when the unpredictability of the agricultural business demands. Without which, the applicant is not only compromising a single season of fruit provision but future provision which has the ability to reduce the level of home grown produce available, increase a dependence on imported produce (which can produce a larger environmental footprint), increased the price of fruit, jeopardize the business contracts that currently exist and may exist in the future, ensure a managed landscape and provide local employment.
- 10.36. It is therefore contended that an agricultural dwelling on site has the ability to limit these problems, reduce the mental pressure and stress for the farm manager and create a positive situation that goes some way to supporting the industry, safeguarding the growth of healthy fruit, managing a landscape and supporting the next generation in their education of agricultural practices.
- 10.37. It is strongly put forward that the proposal site will provide accommodation for a rural worker, at their place of work, which overcomes any other policy concerns about the unsustainable nature of a location.

Farm to Fork Summit Outcomes

- 10.38. In May 2023 the Prime Minister and DEFRA Secretary met with representatives from farm to fork, to discuss how the government and industry can work together to support a thriving UK food industry. The UK Farm to Fork Summit was billed as being the next step in growing a thriving British food and drink sector, which will put more British produce on supermarket shelves in the UK and around the world. This application will support this growth and is endorsed by the report in the following ways.
- 10.39. The Farm to Fork summit outcome report at part 1 states *“Our future food and farming sector will be more productive and resilient thanks to British science and innovation.”* This is quantified as being
- *“A further £12.5 million is being made available in May to support research projects that will support environmental sustainability and resilience on farms.*
 - *Additional investment of up to around £30m to unlock the potential of precision breeding.*
 - *A working group to bring plant breeders, food manufacturers and retailers together to agree an approach that enables these products to reach our shelves.”*
- 10.40. Under part 8 of the report, importantly the government recognise the restrictions that red tape can place upon farmers. The report states *“The government is committed to providing greater planning certainty and flexibility to support the rural economy - in particular, ensuring that the planning system responds to the immediate challenges facing farmers. We want to give farmers greater freedoms to make the best use of their existing agricultural buildings and support the wider rural economy.”*
- 10.41. In order to ensure that this is delivered rather than just promised, the government will:
- *“...launch a review of planning barriers to farm diversification, including any necessary changes to permitted development later this year. The consultation will support rural growth through diversification by allowing farmers greater freedom in how they use their buildings*

- *launch a call for evidence to understand the best way to address barriers that farmers and land managers can face to delivering projects on their land which will improve sustainable food production, nature and biodiversity and support their businesses.*
- *revise national planning policy to ensure it fully seizes all opportunities to support levelling up of economic opportunity across rural areas – specifically, making the approval of new controlled environment horticulture businesses a priority for councils”*

10.42. This application seeks to provide a dwellinghouse to facilitate the management and growth of one of the largest top fruit growers and producer. It has been demonstrated that this is essential for the workings, yields and quality provisions of the holding with this justification being acknowledged at appeal. The Farm to Folk report indicates that support should be given through the planning system specifically for this type of business. Unfortunately the changes to national policy have not yet been introduced, but it is strongly upheld that weight needs to be given to the fact that this must be a priority for councils.

Unleashing Rural Opportunity

10.43. Following the farm to fork summit, the government have released an Unleashing Rural Opportunity report in June 2023. This report complements the governments annual rural report and provides the initiatives to unleash rural opportunity so that those living and working in rural communities can thrive. The four priority areas are defined as being: Growing the rural economy, Connectivity, Homes and energy and Communities.

10.44. Most specific to this proposal is the Growing the rural economy priority. The report states that the government “...is investing £2.4 billion a year to enhance the environment and improve productivity. By investing in the foundations of food security, we will enable thriving businesses, resilient food production, and will support farmers – the original friends of the earth.”

- 10.45. The report also recognises that *“The beauty of our natural landscapes, alongside farmers producing world class food, are at the heart of a living, thriving countryside. We are already working to leave the environment in a better state than we found it. Farmers and land managers have a key role to play in helping the UK achieve net zero. We will continue to support our farmers whilst restoring the environment through our new farming schemes. For rural areas to prosper, farming needs to prosper. It gives life to our rural communities and our landscapes.”*
- 10.46. This proposal seeks to improve productivity and support resilient food production through the most efficient management of top fruit. Not only will this help to create solid food security foundations as varieties will be managed specifically to ensure the highest quality and yields respond, it will ensure that the UK top fruit industry can negate the import of foreign top fruit during traditional out of season times due to effective cold storage and monitoring. This improves net zero credentials, food miles and food transparency. This proposal therefore gains significant support from the Unleashing Rural Opportunity government aims.

11. Conclusion

- 11.1. It is considered that the location for the proposed dwelling in terms of perceived landscape impact, security and to serve the functional requirement of the holding is considered to be justified and overcome the previous reasons for refusal and Inspectors concerns at appeal.
- 11.2. The design and finish of the proposed dwelling has been thought out to be considerate of local design and to fit within the local landscape and vernacular. The size of the dwelling has been reduced (by 31%) and is of modest size to limit the perceived impact upon landscape character and openness of the Green Belt further and in addition to its relocation adjacent to the farmyard. This meets with all relevant policies.

- 11.3. It is concluded that the functional requirement for the dwelling has been comprehensively set out to demonstrate the essential need to be on site having regard to the farming operations that need to be undertaken, the supervision required for all the farm workers needed on the site, the need to review works undertaken during the day's activities to be able to then brief the team early then next morning, to assess and monitor the orchards to prevent disease or damage (faulty irrigation) and to offer site security. These are all points which were endorsed by the Planning Inspectorate.
- 11.4. The proposal facilitates the opportunity for this 3rd generation family run, clearly successful, business to pass on to the 4th generation who are actively showing an interest in agriculture but would benefit from living this experience on site and taking in the realities of owning and running a farm.
- 11.5. Respectfully it is considered that this proposal should be supported with planning permission granted with conditions that are deemed to be appropriate to ensure the continued management of the agricultural holding.

12. Appendices

Appendix 1- Google Earth Land profile extracts

Appendix 2 - British Grower Association survey