
TOWN AND COUNTRY PLANNING ACT 1990 (as amended)**Planning Inspectorate Ref: APP/A2280/W/20/3259868****Medway Council Ref: MC/19/1566****Land Off Pump Lane, Rainham****Appeal by A C Goatham & Son****STATEMENT OF COMMON GROUND**

This Statement of Common Ground has been jointly prepared by the respective agricultural consultants on behalf of the Appellant and Medway Council, regarding the Council's reason for refusal no. 8 (Loss of Best and Most Versatile Agricultural Land).

MATTERS AGREED BETWEEN APPELLANT AND COUNCIL**Details of Site**

- 1.1 *Pump Farm*: the farm was purchased by the Appellant in 2011. The cropping area is 21.75 hectares, of which 20.19 hectares are dessert apples (varieties = Gala, Braeburn, Discovery) and 1.56 hectares are Conference pears.
- 1.2 The majority of the orchards were planted before the Appellant's purchase, save for approximately 9.0 hectares (Blocks 6, 11, 13 and 15) which were re-planted by the Appellant in 2014 (total 4.4 hectares of which Gala = 1.4 hectares/Braeburn = 3 hectares) and 2017 (total of 4.45 hectares of Discovery planted at request of principal supermarket customer).
- 1.3 13.75 hectares (or 63 %) of the owned Pump Farm orchard area is planted on a broadly south-east/north west alignment, the remainder is aligned closer to the north-east/south-west.
- 1.4 A further 4.2 hectares of orchards (3.17 hectares dessert apples/1.04 hectares pears) are rented at Pump Farm under an informal annual agreement.
- 1.5 *Bloors Farm*: the farm was purchased by the Appellant in 2016. The cropping area is 21.56 hectares, all of which are dessert apples (varieties = Gala, Braeburn).
- 1.6 The orchards are located in two blocks of land (of 9.50 and 12.06 hectares), divided by a bridgeway. There are a total of five orchards, whose areas range from 0.82 to 9.33 hectares. The current orchards were planted in 2012 and are all aligned broadly north-east/south-west.
- 1.7 *Buildings*: Pump Farm land includes a limited range of older farm storage buildings and a seasonal workers' caravan camp (c.8 caravans at the time of purchase in 2011, since increased to c.14).
- 1.8 *Irrigation*: Pump and Bloors farms have independent borehole water for crop irrigation, with a licence for trickle application.
- 1.9 *Fencing, boundaries and vermin control*: the southern boundary of each of the farms is separated from the neighbouring railway line by chain link fencing. There is limited other fencing (which is neither stockproof nor vermin-proof) on either farm. Vermin control for the orchards is currently undertaken through the use of individual tree guards.

Current Management

- 1.10 The Appellant operates across North East Kent, Mid Kent, and Medway.
- 1.11 Since acquisition, the Pump and Bloors Farm orchards have been farmed by the Appellant as a 'satellite' holding, which is serviced, in terms of husbandry operations, by one of their 'hub' farms at Howt Green, Bobbing (c.7 miles to the east, by road), and in terms of fruit storage and packing, by Flanders Farm, Hoo (c.8 miles to the north-west, by road).

1.12 By reference to a site study, Reading Agricultural Consultants (December 2018), the overall site includes 8.6 ha Grade 1 land (excellent quality); 40.6 ha Grade 2 land (very good quality); and 2.3 ha Grade 3a land (good quality), making a total of 51.5 ha of Best and Most Versatile (BMV) category land.

1.13 The Appellant has reported that for the harvest years 2016, 2017 and 2018 the orchards have produced an average of 6,702 bins of fruit (apples and pears), equivalent to c.48 tonnes per net cropped hectare. These yields include the fruit produced from the rented land at Pump Farm.

1.14 Para 170 of the NPPF states that “*planning policies and decisions should contribute to and enhance the natural and local environment by...b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services...including the economic and other benefits of the best and most versatile agricultural land... ”.*

- ### MATTERS NOT AGREED

- Signed on behalf of Appellant:**

E. P. M.

17th January 2021

Date: