



WREYLAND
RURAL PLANNING CONSULTANTS

PLANNING & RURAL WORKERS' STATEMENT

Copthall Farm, Breakspear Road South, Ickenham, UB10 8HB | November 2025

Self-build Rural Workers' Dwelling



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1.0 Introduction & Executive Summary

- 1.1 This application seeks full planning permission for a permanent rural worker's dwelling at Copthall Farm, a long-established mixed livestock enterprise on the peri-urban fringe of Hillingdon. Temporary consent was granted in 2021 to support the development of the business; in the intervening period the enterprise has expanded and stabilised into a continuous and professionally managed operation, now generating a clear and permanent essential need for a full-time resident agricultural worker.
- 1.2 The holding operates a rolling herd of approximately eighty beef cattle, sustained by the annual purchase of up to four batches of very young calves. These calves are typically 2–3 weeks old on arrival and require intensive early-life management, including regulated feeding, close disease monitoring and immediate response to welfare issues. Once stabilised, the calves progress through a structured, multi-age system of weanlings, yearlings and two-year stores, requiring daily supervision and intervention throughout the production cycle.
- 1.3 Alongside the bought-in youngstock, a suckler herd of ten breeding cows has been established, calving throughout the year and creating a constant requirement for out-of-hours availability. A small but growing sheep enterprise supplying lambs for direct sale adds further routine and emergency duties. Together, these enterprises generate a continuous, non-seasonal pattern of labour and welfare obligations that cannot be discharged without a resident stockman on site at all times.
- 1.4 The financial performance of the business confirms that the temporary period has achieved its purpose. Turnover, profitability and net assets have grown substantially; capital investment in buildings, machinery, breeding stock and forage capacity demonstrates long-term commitment; and the return of HS2-occupied land in 2026 will further enhance the operational resilience of the holding.
- 1.5 There is no suitable or available accommodation on or near the farm. The existing farmhouse is occupied and cannot be subdivided; the agricultural buildings are operationally required and unsuitable for conversion; and local housing is priced far beyond what an agricultural worker can reasonably afford, with no practical ability to meet out-of-hours livestock demands from off-site.

- 1.6 The only planning harm is the definitional impact of introducing a permanent dwelling within the Green Belt. This harm is limited: a dwelling already exists on the site under temporary permission, the replacement structure is modest and well-sited, and there is no material impact on openness or rural character. Against this minimal harm stand compelling material considerations: the essential and permanent functional need; the proven financial sustainability of the enterprise; the absence of alternative accommodation; and national policy support for rural workers' dwellings under paragraph 84 of the NPPF.
- 1.7 Taken together, these matters demonstrate that the development meets the tests for very special circumstances and accords with both national and local planning policy. The proposal represents the logical and anticipated progression from the temporary consent granted in 2021, securing the welfare, viability and long-term stewardship of Copthall Farm.

2.0 Context and planning history

- 2.1 On 12th May 2022, permission was granted under planning reference 9271/APP/2021/3406 for the construction of a *“temporary Workers’ Dwelling and driveway entrance for an established farm business”* at Copthall Farm for Freddie Dalton.
- 2.2 Copthall Farm is a long-established agricultural holding on the western edge of Ickenham, accessed from Breakspear Road South. The farm has been in the Dalton family’s ownership since the 1920s and remains one of the few active working farms in the locality. The holding extends to approximately 230 acres, of which about 90 acres are farmed in hand, the remainder comprising land held under tenancy agreements and licences. At the time of the earlier application, the business was also in the process of tendering for a further 60 acres, reflecting an ongoing ambition to expand.
- 2.3 The enterprise is centred on beef rearing: very young calves are purchased, hand-fed on milk, and managed through to finishing at around 24 months. This system is labour-intensive, particularly in the vulnerable early stages when round-the-clock presence is required. In 2021, the herd stood at around 60 head, with plans to expand to 90 head through three annual intakes.
- 2.4 Alongside livestock, the farm produces hay, straw and haylage, with surpluses sold into established markets. Copthall Farm is also diversified, letting redundant farm buildings for office, storage and light industrial uses, a source of income recognised in the Council’s appraisal of the farm accounts.
- 2.5 In 2021, the Applicants sought permission for a temporary rural worker’s dwelling. The purpose was to enable succession, with Freddy Dalton, recently graduated from Harper Adams University, assuming day-to-day responsibility for the livestock enterprise. The application was supported by a detailed Planning Statement and Rural Worker’s Justification.
- 2.6 The Local Authority, in its Delegated Report, acknowledged that dwellings in the Green Belt are inappropriate development. However, it concluded that Very Special Circumstances (VSC) existed which outweighed the harm to openness. The factors identified included:

- **Functional need:** the essential requirement for a stockman to live on site, given the round-the-clock supervision demanded by hand-reared calves with the Delegated Report citing RAC's conclusion that the enterprise was viable and required an on-site worker.
- **Financial soundness:** evidence of viability and sustainability of the holding, supported by farm accounts and capital investment, notably the £80,000 fodder building approved under ref. 9271/APP/2019/3381
- **Lack of alternatives:** no other dwellings existed on the unit, and no suitable or affordable housing was available in the locality
- **Succession planning:** the dwelling was integral to embedding the next generation into the business, securing continuity of family farming at Copthall Farm.

2.7 Planning permission was granted for a static caravan for a five-year period (until 12th May 2027), subject to conditions on siting, materials, landscaping and ecological management. The Council's Conservation Officer noted that the unit would extend built form south-west of the Grade II listed Copthall Farmhouse, altering a part of its historic setting. However, the impact was judged limited and reversible due to the low-rise, temporary form of the caravan, and outweighed by the agricultural need.

2.8 That decision established an important principle: that there was an essential need for residential accommodation at Copthall Farm, justified on both functional and financial grounds, and that such a dwelling could be supported notwithstanding the Green Belt designation. The expectation at the time was that the temporary period would allow the business to demonstrate its continued viability and embed the next generation's role in management, before any case for permanence could be advanced.

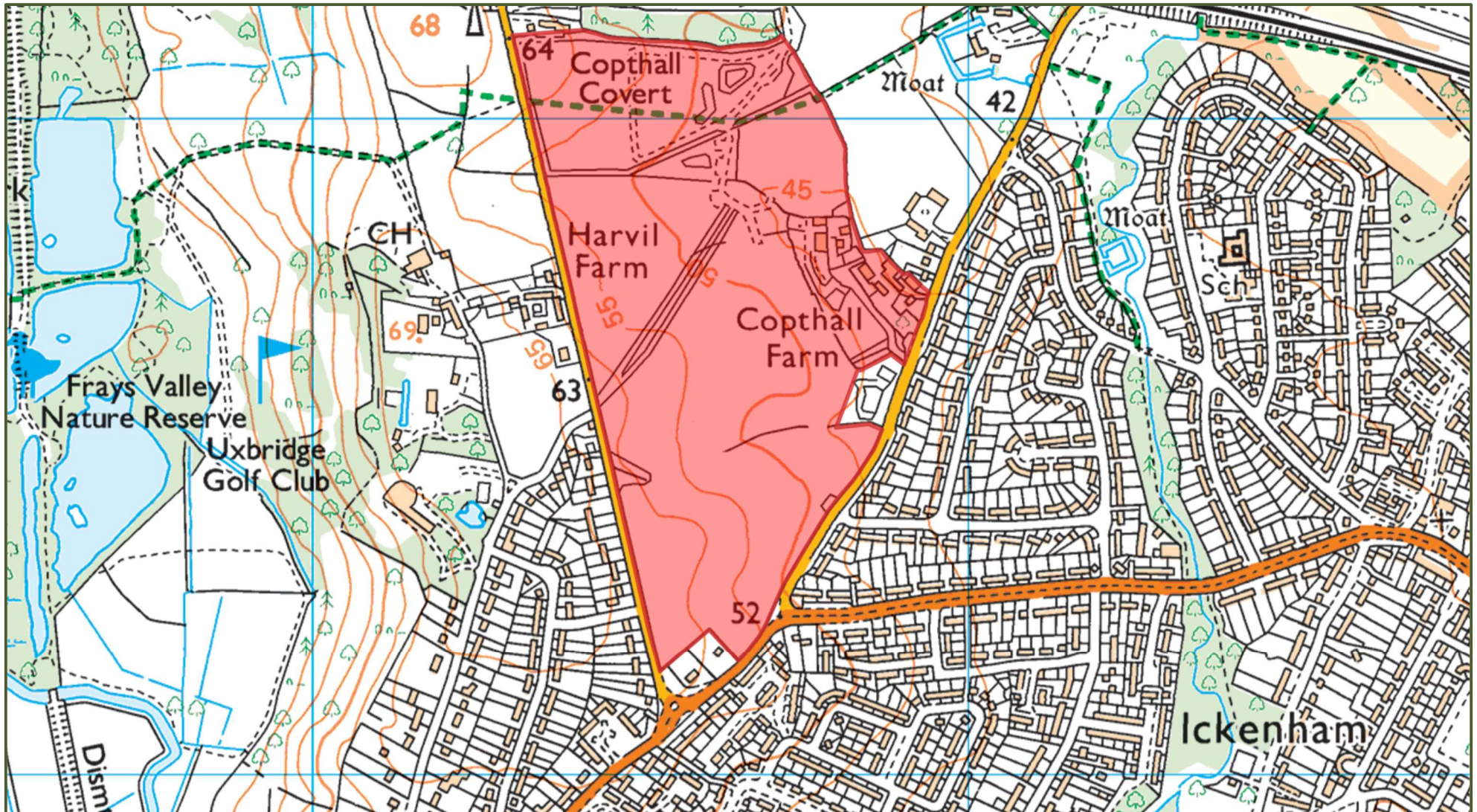
2.9 The 2021 consent sits within a longer trajectory of planning history at Copthall Farm which has consistently demonstrated investment and diversification. Notable earlier permissions include:

- 2003/1442 – part retrospective approval for change of use of farm buildings and land to landscape contracting, storage, offices and car repairs, with a new farm office building and associated works (approved May 2004)
- 2005/2893 – change of use of former farm buildings to provide offices, light industrial and storage uses, farm shop, and associated landscaping, with retention of agricultural uses (approved January 2006);
- 2019/3381 – erection of an agricultural building for hay and straw (approved March 2020).

2.10 These decisions demonstrate a consistent pattern of investment in both the farm's core agricultural enterprise and its diversified activities.

2.11 The present application for a permanent rural worker's dwelling is therefore a direct continuation of the position reached in 2021. It seeks to move from the temporary solution then deemed acceptable to a permanent form of accommodation, thereby securing the long-term welfare of the livestock enterprise and ensuring the continued stewardship of Copthall Farm by the Dalton family.

Figure 1 – Copthall Farm (freehold – additional land is taken under license)



3.0 How the farm business has developed since 2022

- 3.1 Since the grant of temporary permission in 2021, the enterprise at Copthall Farm has continued to evolve and expand under the day-to-day management of Mr Freddy Dalton. The past three years have been a period of consolidation and growth, during which the functional need for a dedicated agricultural worker on site has only become more pressing.
- 3.2 The calf-rearing system has now become an established cycle, with up to four batches of 10 calves per year purchased at 2–3 weeks of age and bucket-reared on the holding. This ensures a rolling herd of approximately 40 calves under one year and 40 cattle between one and two years old, resulting in around 80 head in the system at any one time. These are typically sold as store cattle at 24–26 months, providing a consistent output and underpinning the farm's cashflow.
- 3.3 Alongside the bought-in calves, the family has introduced a suckler herd of around 10 breeding cows (Hereford and Shorthorn), producing a further 10 calves per year. Although still in its early stages, this herd represents a shift towards breeding as well as finishing, with plans to expand to 25–30 cows over the next five years. Calving is spread across the year, requiring year-round vigilance and reinforcing the need for a constant stockman's presence on the holding.
- 3.4 In addition to these core livestock enterprises, the farm has diversified into direct sales through a branded box scheme. Since 2022, selected beef cattle have been finished on site and sold directly to local residents, with strong demand from the surrounding community. This model has now been extended to lamb, with an initial trial of two lambs in 2022 increasing to seven lambs in 2023, all pre-sold directly to local customers. These direct sales provide higher margins compared to the conventional market route, while also strengthening the farm's ties to the local community.
- 3.5 The land base of the enterprise has fluctuated due to the temporary occupation of 80 acres of freehold pasture by HS2 for spoil storage. This has constrained grazing availability and temporarily suppressed stock numbers. However, the land is due to be reinstated by 2026, at which point the farm's operational acreage will increase from around 200 acres to approximately 250 acres. This reinstatement will provide scope to expand livestock numbers further, supporting the aspiration to manage up to 150 head of cattle if housing and infrastructure allow.

- 3.6 Forage production has remained a major activity, with approximately 150 acres cut annually. The enterprise produces 500–600 round bales of silage and around 700 big square bales of hay, providing feed security for the growing livestock numbers. Investment in machinery has also been significant, with the farm now operating a fleet including two 140–150hp John Deere tractors, a telehandler, new topper, muck spreader, and rakes. With the exception of baling, the farm is now largely self-sufficient in field operations, with the capacity to take on limited contracting work in the future.
- 3.7 Overall, since 2022 the business has demonstrated both resilience and growth. The livestock system has stabilised into a rolling throughput, the suckler herd has been established, direct marketing of produce has begun, and the land base is set to expand once HS2 land is returned. These developments evidence not only the viability of the enterprise, but also its reliance on the full-time, skilled presence of a resident agricultural worker on site.
- 3.8 As a result, in 2025 the calf-rearing system continues to bring in up to four batches of ten calves each year, creating a steady rolling herd of around 80 cattle at any one time. This is complemented by the developing suckler herd of ten breeding cows, producing their own calves annually, and a small but growing sheep enterprise supplying lambs for direct sale.

| Enterprise | Numbers 2025 | Notes | SMD requirements (Nix) |
|----------------------|---|--------------------------------|--|
| Beef herd (rolling) | 80hd total (40 under 1 year plus 40 plus yearlings) | Sold as stores at 24-26 months | 140 (40 x 1.9 (18mth beef) & 40 x 1.6 (grass silage beef) |
| Suckler herd | 10 suckler cows + 10 calves per annum | Hereford x Shorthorn | 13.5 (10 x suckler cow + calf) |
| Sheep (direct sales) | 7 lambs finished in 2023 | Sold direct via box scheme | 2.1 (finishing store lambs) |
| Fodder production | 150 acres (60.70ha) | | 60.7 (1 per ha) |
| Maintenance | 250 acres (101.17) | General maintenance | 15.17 |
| | | TOTAL SMD REQUIREMENT | 231.47 |

Figure 2 – Livestock Numbers and associated SMDs

- 3.9 Although the beef system at Copthall Farm operates through clear biological stages, namely arrival of very young calves, an intensive bucket-rearing phase to weaning, and a subsequent growing up to 24–26 months, these are sequential phases within one continuous enterprise, not

separate enterprises for labour-calculation purposes. The forty bought-in calves each year progress directly into the rolling beef herd, and their early-life labour requirements are already encompassed within the recognised Nix SMD coefficients for an 18-month or grass-silage beef animal. To avoid artificially inflating the labour requirement, the SMDs attributable to the weaning and rearing period are therefore not listed as a separate line, and each animal is counted once only within the beef herd total. Likewise, the suckler herd is represented solely through the “cow-and-calf” SMD coefficient and their progeny are not then re-counted within the beef figure. This approach ensures a clear delineation between the biological stages of production while maintaining an accurate, non-overlapping calculation of total labour demand on the holding.

- 3.10 It should also be recognised that the bucket-rearing of young calves generates a substantially higher daily husbandry requirement during the first six to eight weeks of life, with frequent checks, regulated feeding, and heightened disease-risk management. While the Nix SMD coefficients already encompass this early-life labour within the whole-enterprise figure, the practical intensity of this period reinforces the need for a resident stockman and supports the functional-need case.

4.0 Essential need for a Rural Worker

- 4.1 The functional need for a full-time agricultural worker at Copthall Farm arises from the combined labour, welfare and biosecurity demands of a multi-enterprise livestock unit. A central component of the system is the intake of very young calves, typically 2–3 weeks old, whose early-life management requires skilled and immediate intervention. These intensive demands do not end at weaning: they form the beginning of a continuous cycle of husbandry extending through to store stage, alongside the separate but equally demanding suckler herd and sheep enterprises.
- 4.2 When calves arrive on the holding they are at their most vulnerable. Stress from transportation, changes in feed regime, and exposure to new pathogens create a high-risk environment in which problems can escalate rapidly. As the original assessment demonstrated, the first three weeks after arrival require very frequent checks, regulated milk feeding, and careful temperature and hydration management. National data indicate that the majority of calf mortality occurs in this early period, primarily due to pneumonia, scours, and septicaemia, conditions that can deteriorate within hours. Immediate detection and treatment are therefore essential, which in turn requires the presence of a competent stockman on site throughout the day and night.
- 4.3 Once weaned, these calves enter the rolling beef herd, forming part of the consistent population of around eighty head at any one time. Post-weaning setbacks, including ruminal instability, respiratory flare-ups, and nutritional deficiencies, remain common and require close monitoring. The farm's system, comprising newly arrived calves, weanlings, yearlings and two-year store cattle, produces a constant workload involving feeding, bedding, water management, mucking-out, and welfare checks across multiple age groups with differing needs. This complexity ensures a sustained and year-round husbandry commitment, not a short-lived burst of activity limited to the weaning period.
- 4.4 Alongside the bought-in youngstock, the suckler herd currently comprises ten breeding cows, calving throughout the year. The lack of a defined calving block creates an unpredictable pattern of labour and the need for night-time supervision. Difficult calvings, mismothering, retained cleansings and neonatal complications all require immediate intervention. These risks cannot be managed through scheduled visits or off-site living: the consequences of delay may be fatal for both cow and calf.

- 4.5 The sheep and direct-sale enterprises add further depth to the holding's husbandry commitments. Lambs finished for the box-scheme require careful diet management, parasite control and regular inspection. The finishing of selected beef animals for direct sale introduces additional handling, compliance and quality-assurance duties. These activities are layered on top of, not in place of, the core livestock work.
- 4.6 Collectively, these enterprises form a continuous and interdependent system which operates every day of the year. The mixture of newly arrived calves, vulnerable weanlings, breeding cows, young lambs and finishing stock generates welfare risks that cannot be anticipated or deferred. The animal-health obligations under national legislation, combined with standard industry practice, require that a skilled agricultural worker be resident on the holding and available at short notice.
- 4.7 It is therefore the combination of early-life calf vulnerability, the rolling eighty-head beef system, year-round calving, and multi-species livestock duties that establishes an essential functional need for a rural worker to live permanently at Copthall Farm.

5.0 Sustainability of the enterprise

- 5.1 The financial accounts for Dalton’s Farm Ltd show a clear distinction between income generated from the core farming enterprise and that arising from non-core activities, principally rental income. Core agricultural turnover has been relatively steady, moving from £88,289 in 2023 to £81,579 in 2024, before recovering strongly to £105,012 in 2025. This demonstrates an underlying farm business that is both established and capable of growth.
- 5.2 Alongside this, the company has derived significant and increasing non-core income. Reported as “other income” or “other operating income,” this has risen from £61,930 in 2023 to £100,181 in 2024 and £173,191 in 2025. The notes to the 2025 accounts confirm that this category includes rental income from diversified uses of farm buildings, which has become a key source of stability and resilience for the business.
- 5.3 Taken together, total income has almost doubled over the three-year period, increasing from £150,219 in 2023 to £278,203 in 2025. The business has moved from a small loss in 2023 to a modest profit in 2024 and then a very substantial profit of £106,269 in 2025. Net assets have strengthened to £260,204, underpinned by investment in machinery and plant as well as a greatly improved cash position.
- 5.4 The distinction between agricultural turnover and non-core income is important. The farming operation provides the foundation for the business, while the non-core activities supply additional stability and resilience against market volatility. Together they confirm that Dalton’s Farm Ltd is a financially secure and sustainable enterprise, fully capable of supporting the costs associated with a permanent dwelling on the holding.

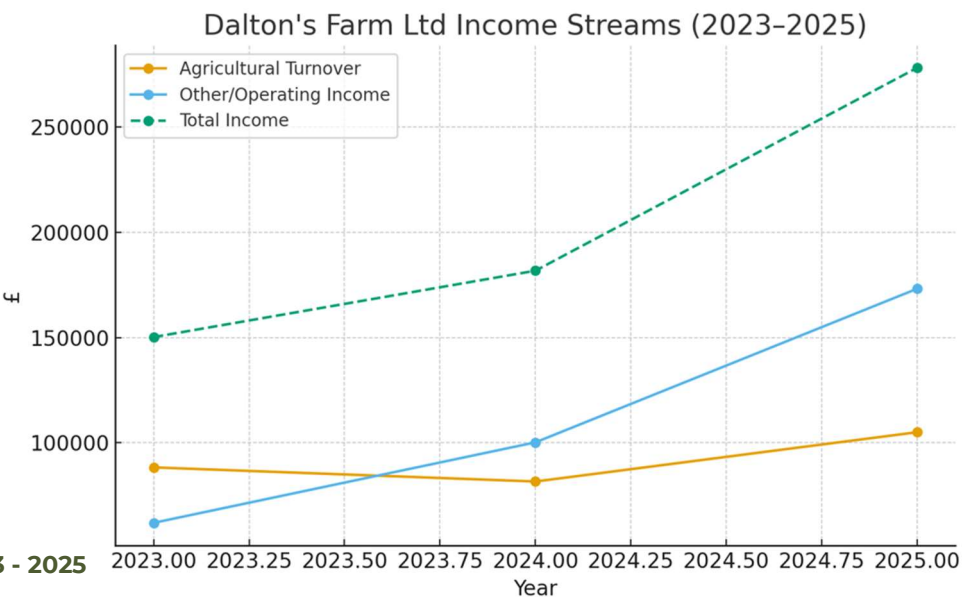


Figure 3 – Dalton’s Farms Ltd turnover 2023 - 2025



Figure 4 – Applicant's livestock



Figure 5 – Copthall Farm is well equipped



Figure 6 – Current temporary workers' dwelling



Figure 7 – Main agricultural yard area

6.0 Proposed development

DESIGN

- 6.1 The proposal seeks full planning permission for the erection of a new two-storey detached dwelling within the grounds of Copthall Farm, Breakspear Road South, Ickenham. The scheme provides a modest, traditionally designed home with associated landscaping, on-site parking, and ancillary storage for bins and bicycles. Access would be taken from the existing entrance track serving the wider Copthall Farm complex, maintaining the established vehicular arrangement onto Breakspear Road South.
- 6.2 The dwelling itself is of conventional form and domestic appearance, constructed in facing brickwork under a pitched tiled roof, with double-glazed windows and doors throughout. The design adopts a simple and balanced composition, with the ridge height kept deliberately low to reduce visual impact and reflect the scale of adjacent buildings. The overall floor area extends to approximately 163 square metres across two floors, providing a well-proportioned family home within a compact footprint.
- 6.3 The ground floor accommodates an open-plan kitchen and dining area, a separate lounge or reception room, a master bedroom with en-suite, and a family bathroom. The first floor provides two additional bedrooms, a utility and boot room, and a cloakroom, with rooflights set into the slopes above to introduce natural light. The arrangement allows for flexible occupation while maintaining a coherent layout and efficient circulation between spaces.
- 6.4 Externally, the site would include two off-road parking spaces, hardstanding, and soft landscaped garden areas, together with a patio to the rear. A post-and-rail boundary fence would define the residential curtilage, and dedicated areas for bin and cycle storage would be provided close to the access. The proposal has been designed to sit comfortably within its semi-rural setting, respecting the existing built form at Copthall Farm while delivering a high-quality dwelling of traditional character and modest scale.

SITING

6.5 The proposed location has been selected for a number of reasons:

1. The site is located within site and sound of the farm buildings and livestock housing.
2. The dwelling is situated at the entrance to the farm. Given the peri-urban fringe siting of Copthall Farm, security is a perennial concern. Since the occupation of the current temporary cabin, the farm has experienced no crime incidents which confirms that the location contributed to the principle of 'designing out crime' – (concording with paragraph NPPF paragraph 135).
3. Copthall Farm has become constrained by HS2 accommodation works which have limited available sites:

Land edged in blue in figure 4 has been tipped on by HS2

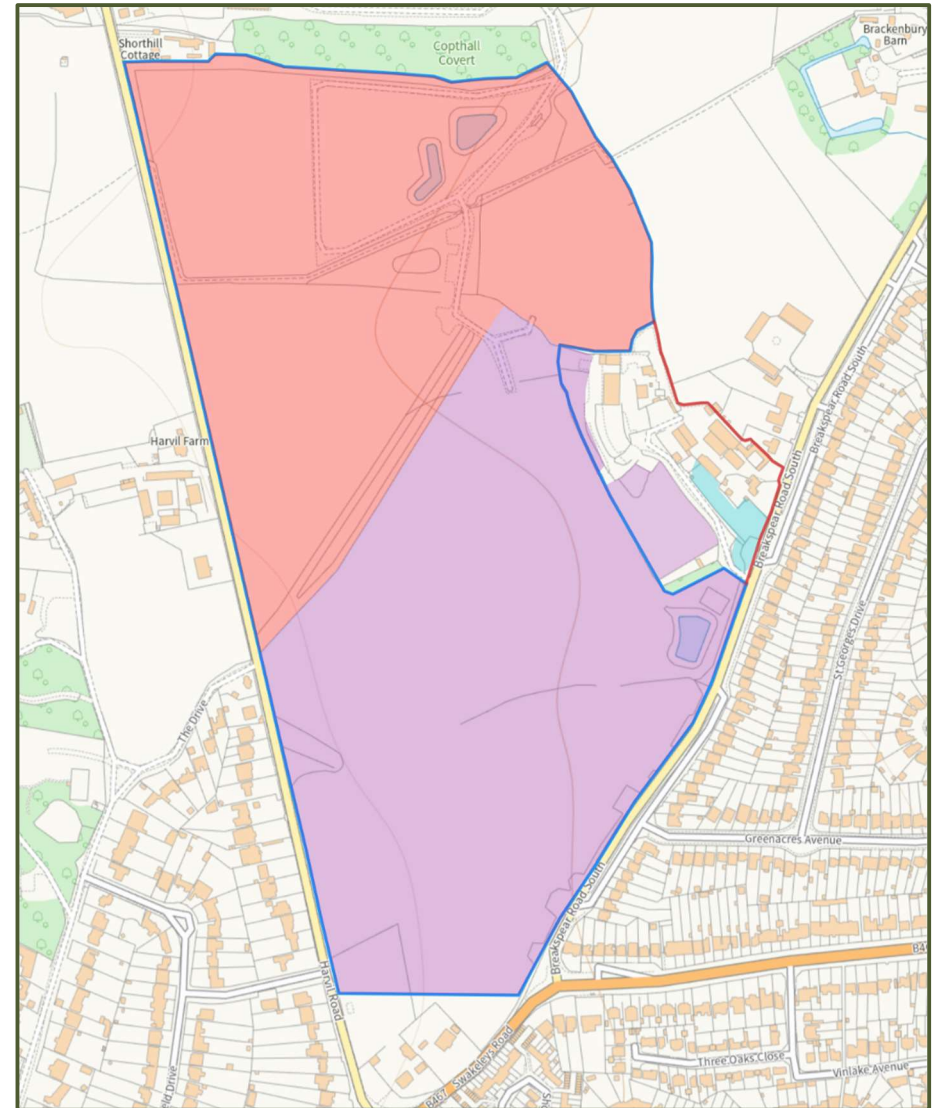
Land coloured red in figure 4 is taken for forage

Land coloured purple in figure 4 is grazed by livestock

Land coloured blue in figure 4 is given to calf grazing

4. The yard at Copthall Farm is given to both agricultural buildings and yards, and has a long history of diversification. There are no free areas or buildings within the existing yard.

Figure 8 – Copthall Farm land uses



7.0 Planning policy considerations – rural workers’ dwellings

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise. Therefore, in order to assess the acceptability of this proposal, it is necessary to assess it against the adopted development plan.
- 7.2 It is also necessary to consider any material considerations relevant to the development proposal, such as national planning policy contained within the National Planning Policy Framework (NPPF) and the national planning guidance contained within the Planning Practice Guidance (PPG), as well as any locally adopted supplementary planning guidance (SPG) and documents (SPD).
- 7.3 The development plan in this instance comprises the Hillingdon Local Plan Part 1 (Strategic Policies), Part 2 (Development Management Policies) and the London Plan 2021.

DEVELOPMENT PRINCIPLE – RURAL WORKERS’ DWELLINGS

- 7.4 The London Borough of Hillingdon does not currently contain a specific policy for rural worker’s dwellings. In the absence of such policy, the NPPF provides the relevant test.
- 7.5 Paragraph 84 of the NPPF (2024) states: *“Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:*
- a) 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.”*
- 7.6 The NPPF therefore establishes that the principle of a dwelling for a rural worker can be justified where an “essential need” exists. The term is not defined in local policy, but has been interpreted in the courts as context-specific. In planning practice, it is generally understood in the functional sense of whether a worker must live on site to ensure the proper functioning of an enterprise.

- 7.7 Paragraph 010 Reference ID: 67-010-20190722 of the PPG supports this interpretation, confirming that essential need may arise where workers must live on site 24 hours a day to protect animal welfare, human health, or to respond quickly to emergencies.
- 7.8 In addition, paragraph 85 of the NPPF (2024) supports the sustainable growth and expansion of all types of rural businesses and the diversification of agricultural holdings. Copthall Farm exemplifies this principle, combining a substantial livestock enterprise with diversified rental income from former agricultural buildings. Together these elements strengthen the business case for securing a permanent dwelling on the holding.
- 7.9 Although Planning Policy Statement 7 (PPS7) is withdrawn, its Annex remains a helpful framework for assessing essential need. The following tests are therefore applied.

(i) Firm intention and ability to develop the enterprise

- 7.10 Copthall Farm has demonstrated a clear pattern of investment. In 2020 the Council approved an £80,000 agricultural fodder building (ref. 9271/APP/2019/3381), which has since been completed. Further investment has been made in new machinery, including tractors and a telehandler, enabling most field operations to be carried out in-house. These works, coupled with the introduction of a branded beef and lamb box scheme, demonstrate both ability and commitment to developing the enterprise.

(ii) Functional need

- 7.11 The livestock system at Copthall Farm operates continuously throughout the year and across several interconnected enterprises. Up to four batches of very young calves are purchased annually, typically at 2–3 weeks of age, and brought onto the holding for intensive early-life management. Once stabilised, these calves integrate into the rolling beef herd of around eighty head, comprising weaned calves, yearlings and two-year store cattle sold at approximately 24–26 months. Alongside this, a suckler herd of ten breeding cows has now been established, calving throughout the year with a planned expansion to twenty-five to thirty cows. The sheep and direct-sale enterprises add further stock requiring routine and emergency care.

- 7.12 The days immediately following calf arrival represent the highest-risk period in the production cycle. Transport stress, changes in feeding regime and exposure to new pathogens create conditions in which disease can develop rapidly. National evidence indicates that the majority of calf mortality occurs in the first month of life. On arrival, calves are hand-fed, trained to feeders, vaccinated within 48 hours, and monitored intensively. Checks of up to six times per day are required during the first three weeks, with feeding discipline and hydration control being critical to prevent digestive upset, dehydration and metabolic disorders. These tasks are inherently time-sensitive and cannot be postponed to scheduled visits.
- 7.13 Even after weaning, the youngstock remain vulnerable to respiratory disease, scours and nutritional setbacks, particularly during periods of unstable weather or housing transitions. Conditions such as pneumonia, Salmonellosis, Navel-ill, Diphtheria and calf tetany can escalate within hours, requiring immediate identification, isolation and treatment. Some, notably Salmonellosis, may cause sudden collapse without prior clinical signs. These risks extend well beyond the early feeding period and necessitate a competent worker on site, able to respond swiftly to emerging problems at any time of day or night.
- 7.14 The suckler herd adds a further dimension of unpredictability. Calving occurs throughout the year, with no defined block, requiring round-the-clock availability to deal with complications such as malpresentation, retained cleansings, mismothering and neonatal vulnerability. These events cannot be managed remotely or by a worker living off-site: the timing is unpredictable, and delay can be fatal for both cow and calf.
- 7.15 Taken together, the intake of very young calves, the rolling eighty-head beef herd, the year-round calving suckler unit and the growing sheep and direct-sale enterprises create a continuous, non-seasonal pattern of labour and welfare obligations. These duties require daily presence and rapid intervention, often outside normal working hours. The combined welfare, biosecurity and operational needs of the enterprise therefore establish a clear functional requirement for a skilled agricultural worker to reside on the holding.

(iii) Financial sustainability

- 7.16 Copthall Farm is a long-established family enterprise, operating on approximately 200 acres (set to rise to 250 acres in 2026 with the return of HS2 land). The accounts of Dalton's Farm Ltd confirm a robust financial position. After a small loss in 2023 (–£5,231), the business made a modest profit in 2024 (£12,940) and a substantial profit in 2025 (£106,269).

7.17 Core agricultural turnover rose to £105,012 in 2025, while other operating income, including rental receipts from diversified uses, reached £173,191. Total income almost doubled in three years to £278,203. Net assets grew to £260,204, supported by capital investment and a strong cash position (£95,000 at year end 2025). This evidences that the enterprise is viable, sustainable, and capable of supporting the cost of a permanent dwelling.

(iv) *Availability of alternative accommodation*

7.18 There are no other dwellings available on the holding or in its immediate vicinity that could meet the essential functional need. The farmhouse is already occupied and offers no scope for subdivision without fundamentally compromising its layout, amenity or heritage character. This arrangement is neither appropriate for the long-term running of a modern agricultural unit nor compatible with the need for immediate out-of-hours access to livestock and machinery.

7.19 None of the agricultural buildings at Copthall Farm are suitable for conversion to residential use. They are modern steel-framed structures required for livestock housing, machinery storage and forage management, and their loss would materially diminish the operational capacity of the unit. The yard has a long history of diversification and every existing building and hardstanding area is operationally committed.

7.20 The local housing market provides no realistic alternative. Properties within a practical response distance to the livestock buildings are limited, and those that do exist fall significantly outside the price range of an agricultural worker's income. Moreover, the peri-urban fringe setting of the holding means that nearby dwellings are typically suburban in character and command high values driven by commuter demand, well beyond what the enterprise could sustain. Renting within a reasonable proximity is similarly constrained, with available lets infrequent, expensive and typically unsuitable for a worker who must be on call throughout the night for calving, emergencies and stock health interventions.

7.21 Taken together, these circumstances demonstrate that there is no suitable, available or affordable accommodation either on the holding or within the locality. A dwelling on the site itself is therefore the only practicable means of meeting the essential functional need of the enterprise.

8.0 Planning policy considerations – access

- 8.1 The proposed development would not result in any increase in vehicle movements or highway impacts beyond those already established under the extant temporary permission (Ref. 9271/APP/2021/3406). That earlier consent related to a temporary rural worker's cabin and was assessed by the Local Highway Authority, who confirmed that the proposal would not give rise to any measurable or adverse effects upon the local highway network. The Officer concluded that the scale of use, parking provision and access arrangements were acceptable, with the only requirement being the inclusion of secure cycle storage, which could be secured by condition.
- 8.2 The current proposal seeks the erection of a permanent rural worker's dwelling on the same site, serving the same agricultural enterprise and generating the same level of traffic. As such, the level of lawful highway activity remains unchanged.
- 8.3 Policies DMT 2 and DMT 6 of the Local Plan require that development ensures safe and efficient vehicular access, avoids adverse impacts upon local amenity or congestion, and provides parking in accordance with the adopted standards. Similarly, Policies T4 and T6 of the London Plan (2021) seek to safeguard the highway network and maintain pedestrian safety.
- 8.4 Given the Highway Authority's previous conclusions under reference 9271/APP/2021/3406, and the fact that the present proposal represents a single dwelling of the same functional purpose and traffic profile, it stands to reason that the development would have an equally acceptable impact on highway safety and efficiency. The proposal therefore accords with Policies DMT 1, DMT 2 and DMT 6 of the Local Plan and Policies T4 and T6 of the London Plan (2021).

9.0 Planning policy considerations – heritage

9.1 The main dwelling at Copthall Farm is Grade II listed (6th September 1974 - List entry number 1358358), and ascribed the following list description:

“C16 3-bay timber framed building with later brick skin and south-east wing of late C19. Front of L-shape. 2 storeys. 2 bays remain visible of old house and Victorian I-bay wing projects at left under hipped gable. There is a late C17 lean-to on back right. Red brick; half-hipped tiled roof with old ridge stack. Entrance in C19 porch in angle. At back exposed heavy square framing, with brick filling, and a projecting chimney in Southern bay. Small C19 1-bar casement windows throughout. [Inside framing complete including side-purlin roof with wind braces.”



Figure 9 – Relationship between proposed development and Copthall Farmhouse

9.2 Copthall Farmhouse is situated approximately 75m to the north-east of the proposed development with an intervening orchard / garden area, agricultural track and mature vegetation. There is no visual or historic nexus between the two sites.

9.3 Copthall Farmhouse holds heritage significance as a well-preserved example of vernacular domestic architecture that has evolved over several centuries. Its origins lie in the 16th century, evidenced by the surviving three-bay timber frame, side-purlin roof with wind braces, and heavy square framing to the rear. These features demonstrate traditional carpentry methods and constructional techniques typical of the period.

9.4 The later 19th-century brick skin and projecting wing reflect the gradual adaptation of the dwelling to changing materials, fashions, and domestic requirements while maintaining the integrity of its earlier core. Internally, the complete timber framing and roof structure provide important evidence of early building practices and the spatial arrangement of modest rural houses. Collectively, these elements illustrate the continuity of occupation and the evolution of rural domestic architecture from the late medieval period through the Victorian era. The building's significance therefore lies in its architectural integrity, the legibility of its development over time, and the insight it provides into local craftsmanship and the social history of the rural household.

9.5 In terms of the asset's setting and the contribution this makes to its significance, an analysis of map progression tells a story of creeping urbanisation from the farm's original setting amidst a rural hinterland in the early 19th century to the coming of the railway, the introduction of commuted tickets and resulting suburban development, farm diversification and the 21st century development of infrastructure associated with HS2.

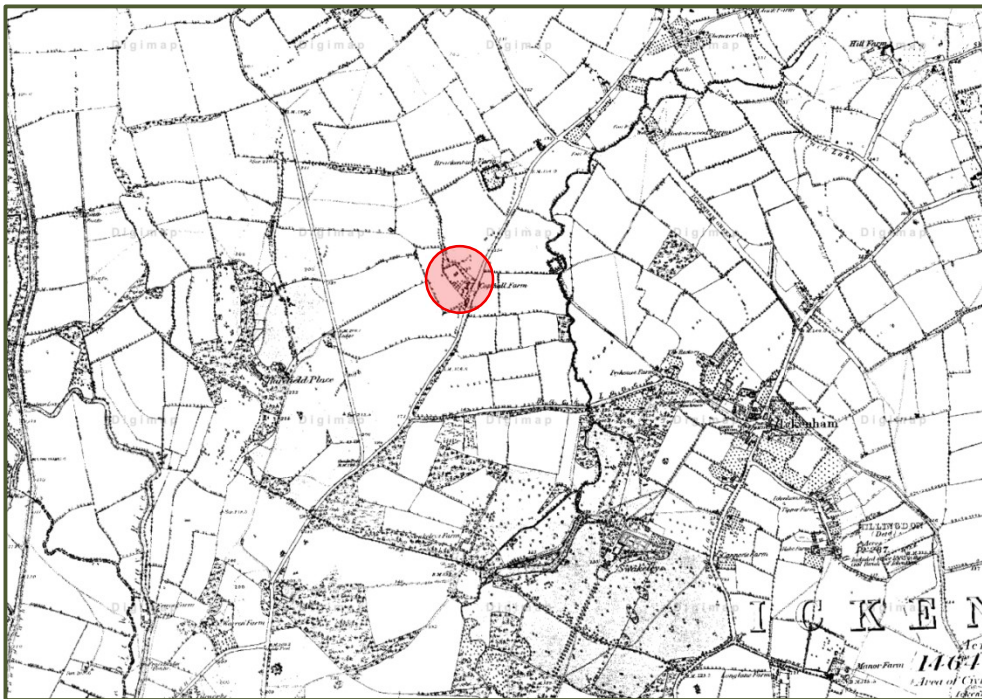


Fig 10 – Showing Copthall Farm in circa 1860 on the outskirts of the small village of Ickenham

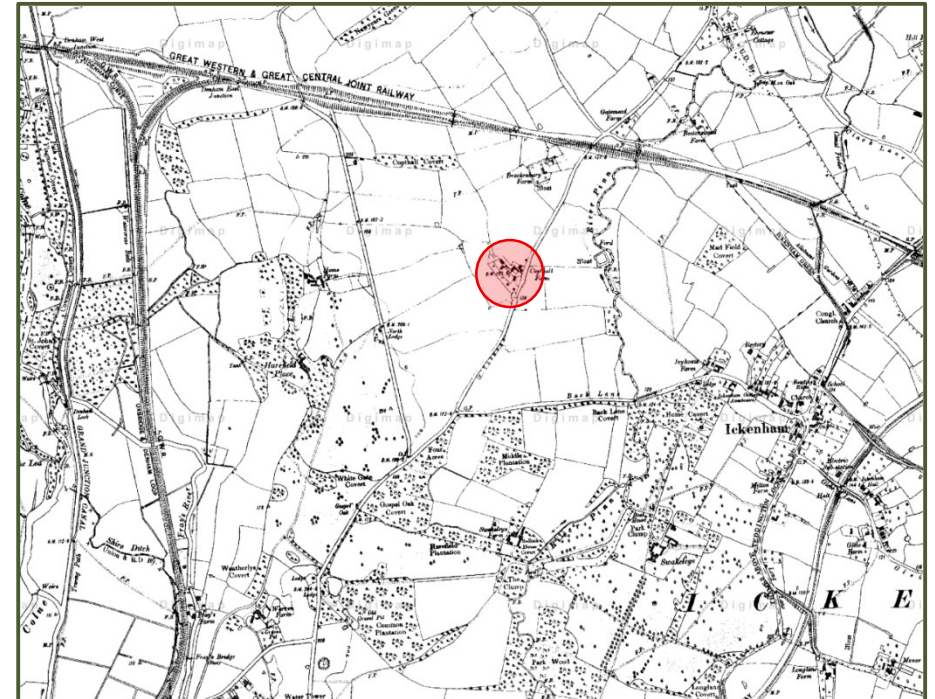


Fig 11 – By the early 20th century the railway has arrived though wider development of Ickenham is not yet apparent

Fig 12



Fig 13

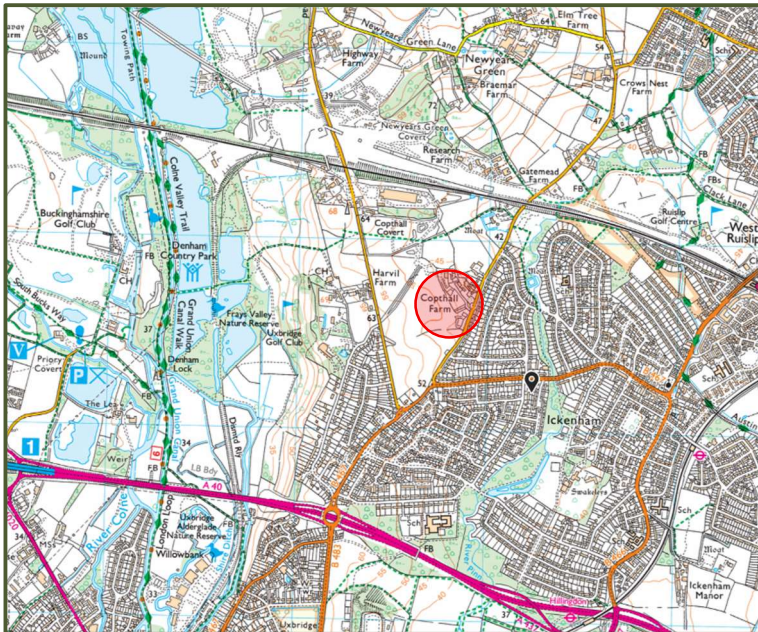
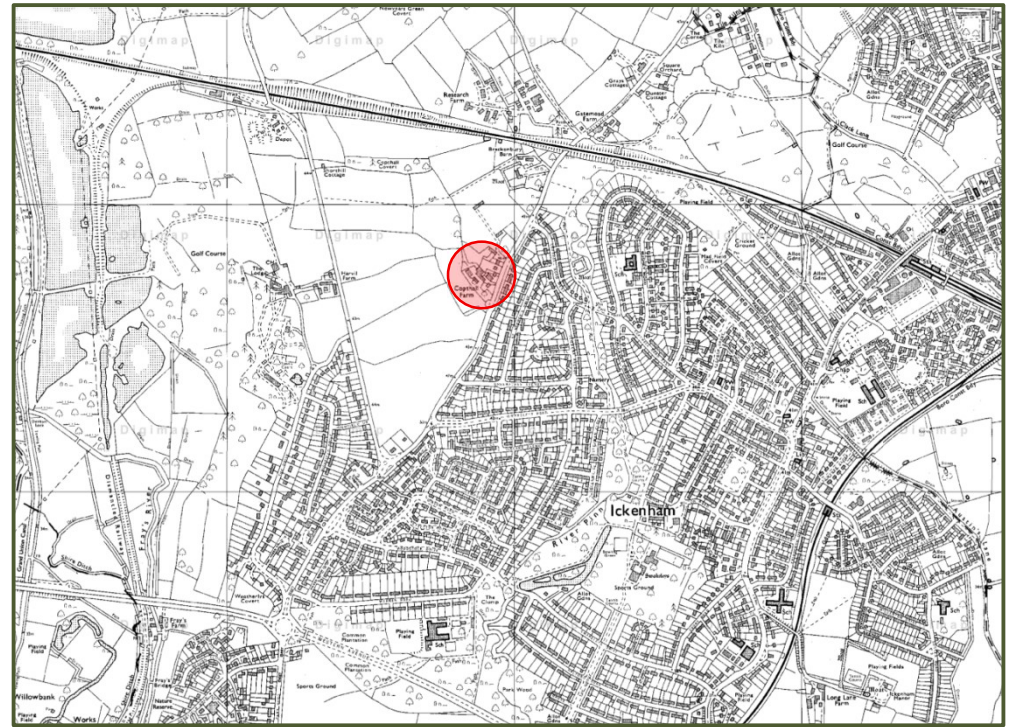


Fig 14

- 9.6 Within 20 years (by 1930 Fig 12) Ickenham has witnessed significant development with further growth progressing through to 1960 (Fig 13) with a particularly high proportion of detached/semi-detached housing, presumably owing to Ickenham's advantageous transport links and direct access to central London.
- 9.7 Comparison between 1960 and 2025 (Fig 14) demonstrates however that further growth was arrested with the urban area remaining similar, presumably as a result of the introduction of the Metropolitan Green Belt in 1955.
- 9.8 Today Copthall Farm is an outlier – an isolated farm enterprise situated very much within the peri-urban fringe with its historic setting bearing very little resemblance to that of the 19th century. As a result, the setting of Copthall Farmhouse contributes very little to its significance and therefore the proposed development will not cause harm to the overall significance of the heritage asset

10.0 Planning policy considerations – the Green Belt

- 10.1 The site lies within the Metropolitan Green Belt. In accordance with paragraph 147 of the NPPF, the construction of new buildings in the Green Belt is inappropriate unless they fall within one of the stated exceptions. A permanent dwelling does not do so and is therefore inappropriate development by definition. Substantial weight must be given to that harm.
- 10.2 The NPPF goes on to state, at paragraph 148, that inappropriate development should not be approved except in very special circumstances (VSC). VSC exist where the harm to the Green Belt is clearly outweighed by other material considerations. That test is a balance, not an absolute prohibition.
- 10.3 This site is not a speculative case. In 2021, the Council accepted that:
- There was an essential functional need for a full-time stockman to live on the holding.
 - The enterprise was financially sound and operating on a long-term basis.
 - No suitable or available alternative accommodation existed.
 - The dwelling was required to secure succession and continuity of the family farm.
- 10.4 Those findings were determinative in granting the temporary dwelling. They continue to apply, with strengthened supporting evidence.
- 10.5 The current proposal does not alter the extent of built development or introduce a new residential use to the site. It replaces a temporary structure with a permanent dwelling of modest size, within the same farmstead, for the same proven agricultural need. There is no additional spatial or visual intrusion beyond that already accepted.
- 10.6 Since 2021, the enterprise has demonstrably increased its livestock numbers, land base, capital investment and profitability. The functional need is now permanent, not provisional. National policy and appeal precedent confirm that it is artificial to require repeated temporary consents where an

enterprise has already passed the evidential threshold of permanence, viability and full-time labour demand. The test has been met; the planning response must follow.

- 10.7 There is no other policy objection. The dwelling causes no harm to heritage significance, landscape character, ecology, highways, drainage or residential amenity. The only identified harm is the definitional Green Belt harm inherent in any dwelling.
- 10.8 When the proposal is assessed in the round, the balance of considerations is unequivocal. The essential need for a resident worker has already been verified through independent agricultural appraisal; the enterprise has demonstrated sustained financial viability; there is neither an existing dwelling on the unit nor any realistic alternative that could meet the need; national policy positively supports the continued operation and growth of rural businesses; and the application represents the natural and anticipated progression from the temporary consent previously granted.
- 10.9 Taken together, these matters clearly outweigh the definitional Green Belt harm. Accordingly, very special circumstances exist for the purposes of paragraph 148 of the NPPF, and the proposal meets the Green Belt test.

11.0 Planning policy considerations – water management

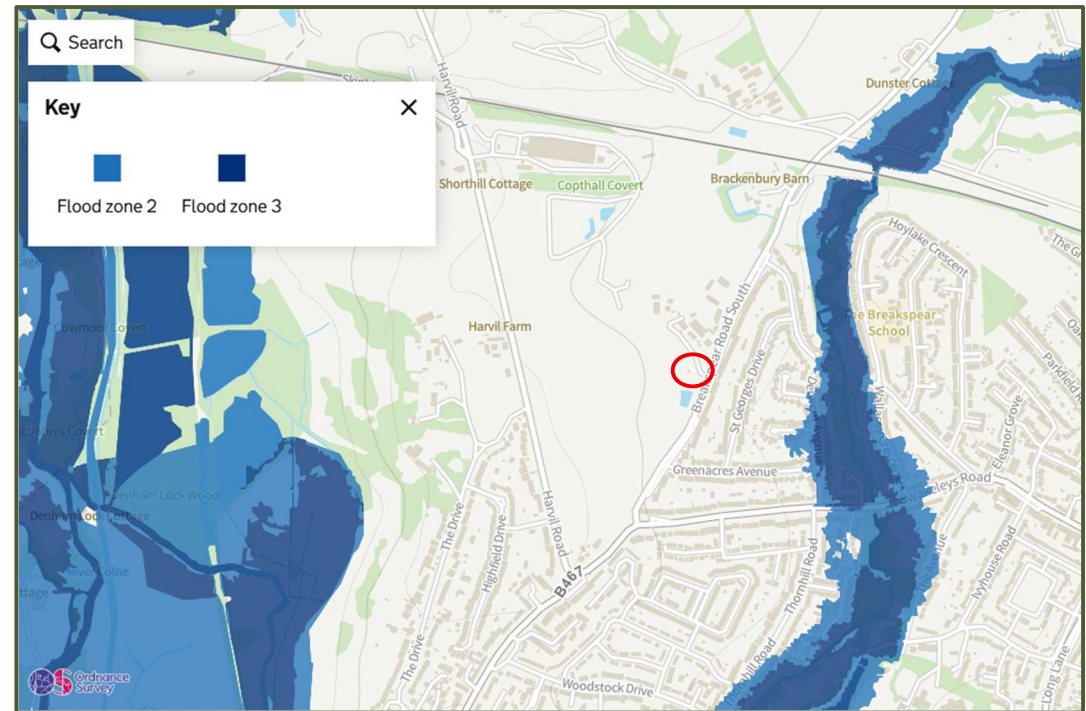
Fig 15 – Flood Risk

11.1 According to the Environment Agency (EA) Flood Map for Planning, the application site is located within Flood Zone 1.

11.2 Therefore, the site itself has a low level of flood probability from the rivers/sea (less than 1 in 1,000 annual probability).

11.3 In addition, the extract from the EA surface water flood maps indicates the site has a 'very low' prospect of being at risk from surface water flooding.

11.4 Relevant policy is set out in the National Planning Policy Framework (NPPF), which places a clear obligation on new development to avoid increasing flood risk and to manage surface water sustainably.



11.5 At a local level, Policy DMEI 10 of the Hillingdon Local Plan: Part 2 (2020) requires the use of Sustainable Drainage Systems (SuDS) wherever practical, both to limit runoff to greenfield rates and to prevent additional pressure on the public sewer network.

11.6 These requirements sit alongside the Building Regulations, which prescribe minimum standards for foul and surface water drainage in all new dwellings.

11.7 For this proposal, surface water from the roof of the rural worker's dwelling will be directed to a water storage system, enabling its reuse on the holding for garden irrigation and day-to-day land management. This approach aligns with the SuDS hierarchy by prioritising source control and

onsite reuse before any consideration of discharge. The development therefore makes efficient use of natural resources and avoids any need to connect to the public surface water system.

- 11.8 The dwelling is to be served by permeable surfacing for all external areas, and no additional impermeable hardstanding is proposed beyond the building footprint itself. The wider plot remains undeveloped grassland, and the existing topography allows water to infiltrate naturally. An established field ditch at the northern boundary provides an additional interception route for overland flows during intense rainfall events. All drainage measures will be accommodated within the applicant's freehold, with no reliance on third-party land or off-site infrastructure.
- 11.9 Foul drainage from the dwelling will be managed via a package treatment plant in accordance with Building Regulations and the Environment Agency's General Binding Rules. The holding is sufficiently sized to accommodate a compliant drainage field with the required setback distances from buildings, boundaries and water features. There is therefore no necessity to connect to the mains sewer, and no adverse impact on groundwater or controlled waters is anticipated.
- 11.10 If required by the Local Planning Authority, full design details, such as percolation test results, drainage field layout and treatment plant specification, can be secured by condition prior to commencement. This is standard practice for rural sites and avoids the need for unnecessary pre-determination detail.
- 11.11 Accordingly, the proposal achieves sustainable foul and surface water management, does not increase flood risk on or off site, and complies with the relevant provisions of the NPPF and Policy DMEI 10 of the Hillingdon Local Plan.
- 11.12 On this basis, the proposal will not increase flood risk on or off site, does not require discharge to the public sewer, and fully complies with the drainage and flood risk provisions of the NPPF and Local Plan Policy DMEI 10.

12.0 Planning policy considerations – ecology

- 12.1 A Preliminary Ecological Appraisal (PEA) was carried out by Arbtech Consulting Ltd on 29 October 2025 to inform the application. The survey area comprises a small plot of approximately 0.052 hectares containing a mobile home, a timber shed, gravel hardstanding, mown garden and two boundary hedgerows. The wider landscape is semi-rural, but the site itself is not subject to any statutory or non-statutory ecological designation.
- 12.2 The only habitat of recognised priority value on the site is the native hedgerow along the eastern and southern boundaries. One is in good condition and the other in moderate condition; both will be retained in part but will be subject to minor localised removal to facilitate development. All other habitats present – mown grassland, gravel, and temporary structures – are of negligible or low ecological value. No direct impacts are expected on any designated sites, the nearest being Frays Farm Meadows SSSI located 900 metres to the west, which lies well beyond the zone of influence for a development of this scale.
- 12.3 No evidence of roosting bats was recorded and the two existing structures were assessed as offering negligible roosting potential. The hedgerows and adjacent woodland provide some foraging and commuting value, and this will be safeguarded through the adoption of a low-impact lighting strategy retaining dark corridors. A single bat box is recommended as an enhancement measure.
- 12.4 The site offers limited nesting opportunity for common bird species, restricted to the hedgerows. Any vegetation removal will therefore be timed outside the nesting season or will be subject to an ecologist's check immediately prior to works. Two bird boxes on retained trees are proposed to provide compensatory nesting habitat.
- 12.5 The site offers only low-grade habitat for reptiles, amphibians, badgers and hedgehogs, though their presence cannot be completely ruled out. The ecologist recommends precautionary clearance methods, including staged vegetation cutting, covering of excavations overnight or provision of escape ramps, and adherence to general pollution-prevention measures. These standard methods are proportionate to the level of risk and avoid the need for further survey effort.

- 12.6 No invasive species were identified. The development falls within the self-build exemption to mandatory Biodiversity Net Gain under the Environment Act 2021; however, reasonable enhancements will still be incorporated, including native planting, bird and bat boxes, and creation of small features such as log or brash piles for invertebrates and amphibians.
- 12.7 In summary, the proposal will not give rise to any significant ecological effects. The habitats affected are of low value, the risk to protected species is minimal, and all potential impacts can be addressed through straightforward construction safeguards and modest on-site enhancements. The scheme is therefore compliant with the relevant provisions of the NPPF and local plan policies relating to biodiversity conservation.

13.0 Discussion and conclusion

- 13.1 The central question for the authority is whether the circumstances that justified a temporary rural worker's dwelling in 2021 have now matured into a position that justifies permanence. The evidence presented in this application demonstrates that they have. The essential need for a resident stockman, the viability of the enterprise, and the lack of any suitable alternative accommodation have all strengthened since the earlier decision.
- 13.2 The livestock system is no longer emerging; it is established, multi-layered and permanent. The intake of very young calves, typically 2–3 weeks of age, creates an exceptionally high-risk phase in which welfare outcomes depend upon rapid intervention. As detailed in Section 4.0, the first three weeks after arrival involve intensive feeding discipline, hydration management, temperature regulation, and constant disease monitoring. Problems such as pneumonia, scours, Salmonellosis and septicaemia are capable of escalating within hours. These conditions do not permit a worker to reside off-site or to attend at fixed intervals. Immediate response is intrinsic to acceptable husbandry.
- 13.3 These vulnerabilities do not disappear at weaning. Newly weaned calves, yearlings and store cattle present different but continual risks: respiratory flare-ups, ruminal instability, and nutritional setbacks are most common during periods of weather volatility or housing transition. At any one time approximately eighty head are present, spanning four age groups. Parallel to this, the suckler herd now calves year-round, requiring unpredictable night-time intervention and neonatal care. The sheep and direct-sale enterprises add further routine and compliance duties. Taken together, the holding operates as a continuous cycle of work, not an enterprise with seasonal peaks. The essential need for a resident worker is therefore appreciably stronger today than in 2021.
- 13.4 The financial evidence likewise confirms permanence. Dalton's Farm Ltd has moved from a modest loss in 2023 to a profit in 2025, with turnover almost doubling and net assets rising significantly. Investment in machinery, livestock housing, breeding stock and forage production demonstrates confidence and long-term commitment. The return of HS2-occupied land in 2026 will further increase carrying capacity and operational resilience. These are indicators not of a tentative enterprise but of a farm that is stable, expanding and fully capable of supporting the cost of a permanent dwelling.

- 13.5 The proposed dwelling is modest in scale, traditional in design, and positioned adjacent to existing built form. It replaces an established, lawful residential use on the same site and does not introduce any additional spatial or visual intrusion. There is no harm to heritage significance, landscape character, ecology, drainage, highways or residential amenity. All technical matters are addressed or readily mitigated by condition.
- 13.6 The sole planning harm is the definitional harm arising from Green Belt policy. Substantial weight must be afforded to this, but in this case the harm is limited: residential occupation already occurs and any prejudice to the Green Belt is offset by the substantial weight attributable to the essential and permanent functional need; the verified financial sustainability of the enterprise; the absence of any suitable or available accommodation either on the holding or within a practical distance; and national policy support for rural enterprises requiring on-site housing for animal welfare and operational continuity.
- 13.7 It is also relevant that the Council has already accepted these principles. The 2021 permission explicitly envisaged a phased approach: temporary accommodation to allow the business to consolidate, followed by an assessment of permanence once viability and need were proven. That point has now been reached. The present proposal is therefore not a new proposition but the logical and anticipated completion of the pathway the authority itself endorsed.
- 13.8 When weighed in the round, the considerations in favour of the development clearly outweigh the definitional Green Belt harm. The very special circumstances test is met. The proposal accords with paragraph 84 of the NPPF and sits comfortably within the established planning framework for rural workers' dwellings. Planning permission should now be granted.



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