

Friday, 6 April 2018

Ref: ELC18-A

Development Management
Mid-Devon District Council
Phoenix House, Phoenix Lane
Tiverton, Devon
EX16 6PP

Application to remove condition 8 to make permanent planning permission 12/00045/MFUL 'The siting of a temporary agricultural worker's dwelling for a period of 5 years' granted at appeal ref: APP/Y1138/A/12/2181808, at Elder Farm, Greenham Reach, Holcombe Rogus, Devon, NGR: 307117 120011

Introduction

1. Please find enclosed a planning application on behalf of Ecological Land Co-operative, the landowner. This covering letter seeks to provide a description and justification for the proposed development. The application fee as calculated on the planning portal is £234.
2. The application comprises:
 - PA01: Planning Application Form
 - PA02: Site Location Plan (scale: 1:2500 @ A1, drawing no.: L-01(A))
 - PA03: Planning Statement (this document)
 - PA04: Greenham Reach Appeal Decision Letter (PINS ref: 2181808)
 - PA05: Elder Farm Agricultural Appraisal by Geo Ltd (2018) *[Confidential]*
 - PA06: Approved ELC Management Plan (2012)
 - PA07: Greenham Reach Monitoring Report Year 2 (2014-15)
 - PA08: Greenham Reach Monitoring Report Year 3 (2015-16)
 - PA09: Greenham Reach Monitoring Report Year 4 (2016-17)
 - PA10: Elder Farm Business Plan *[Confidential]*
 - PA11: Elder Farm Accounts *[Confidential]*

Planning history

3. The relevant planning history for the site is as follows:

12/00045/MFUL: Siting of a temporary agricultural worker's dwelling for a period of 5 years together with an agricultural barn with PV array, greenhouse, W.E.T. waste water treatment system and alterations to the existing highway access and private ways as part of a scheme for new entrants to ecological agriculture, validated 27th December 2011, refused 7th June 2012

APP/Y1138/A/12/2181808: Appeal against decision re. 12/00045/MFUL, granted 18th April 2013

12/00045/MFUL *Discharge of conditions 3 & 5*, part-discharged 21st June 2013

12/00045/MFUL *Discharge of conditions 2 & 3*, approved 22nd November 2013

12/00045/FUL/NMA: *Non-material amendment to alter conditions 1, 5 & 6*, Split decision: amendment of conditions 1 and 5 approved, amendment of condition 6 refused, 11th February 2014

17/00628/FULL: *Full Application* for Erection of a 1kW wind turbine with a maximum blade tip height of 9.8m, validated 15th May 2017, approved 29th January 2018

Background: ELC & Greenham Reach

4. The Ecological Land Cooperative (ELC) is a not-for-profit community benefit society founded to support the creation of sustainable land-based livelihoods in England. The ELC is a member organisation with its directors elected by the membership. It is registered with the Financial Conduct Authority Mutuals Team, registration number 30770R. In the 10 years since the ELC was established it has:

- Developed a model to deliver affordable smallholdings, including a bespoke lease, Section 106 Agreement, Management Plan and monitoring programme;
- Carried out annual monitoring of the management plan objectives and submitted a monitoring report to the LPA each year detailing compliance at the Greenham Reach site;

- Conducted a year-long research project into the viability of small-scale ecological agriculture, featured in the Research Councils UK's publication Big Ideas for the Future showcasing "UK research that will have a profound effect on our future";
 - Created a free publicly accessible web-resource on ecological agriculture (<http://ecologicalland.coop/uk-agroecology>);
 - Harnessed the support of food and farming organisations who have provided our existing smallholders with support, and agreed to support future ELC smallholders in establishing their farm businesses;
 - Participated in four research programmes and given evidence to the All Party Parliamentary Group on Agroecology on two occasions;
 - Raised over a million pounds in investment and loans to further the mission of providing affordable smallholdings for new entrants to ecological farming.
5. The cost and availability of land are the biggest barriers a new farmer faces. The shortage of supply of affordable land is reflected in the age of current farmers with just 13% of farmers under the age of 45, and 38% under the age of 55. Further, the number of farmers under the age of 45 has fallen each year during this last decade from 18% in 2003.
 6. Alongside this there has been a marked increase in the number of young people hoping to have a career in farming. In 2015-16 there were 19,025 students studying agriculture, up from 15,685 in 2006-7, yet between 2000 and 2010 only 4% of farm purchases can be attributed to new entrants falling to 2% in 2016. The total number of 'county farms' available for rent in England has also fallen, from 12,882 in 1966 to just 2,583 in 2016. The ELC seeks to address these issues by increasing the availability of affordable smallholdings for new entrants to farming.
 7. The ELC has to-date established one project, Greenham Reach, a cluster of three affordable smallholdings in Mid Devon district on an 8.85 hectare site (being the application site) and has purchased land for two similar developments.
 8. Greenham Reach is now occupied by three families each operating a small farm business from their holding. The 8.85 Ha site provides five full-time jobs in organic agriculture. The produce is supplied to shops, restaurants and directly to customers. As of November 2016, the smallholders at Greenham Reach had between them hosted 4 school visits and 14 educational, open and

work days, reaching some 390 participants. There has been over £130,000 of investment into the farm businesses, 13,505 kwh of renewable energy generated and site wide improvements in soil health. The annual monitoring reports have contributed to third party research, and the site has been profiled by media, including twice by BBC Radio 4's *Farming Today*, and by multiple organisations including the Council for the Protection of Rural England.

Site description

9. The application site covers c. 2.7 hectares (c. 6.6 acres): this includes Elder Farm (Plot A) (2.2 ha / 5.4 ac), and a communal area (0.48 ha / 1.2 ac) that Elder Farm shares with Plot B and Plot C. The site's boundaries are shown on the Site Location Plan (drawing no.: L-01(A)). The site is not subject to any special landscape or environmental designation, and is in Flood Zone 1.
10. Separate applications are also being submitted on neighbouring Wild Geese Acres (Plot B)¹ (2.6 ha / 6.5 ac), and Steepholding (Plot C)² (3.6 ha / 8.9 ac).

The application proposal

11. The proposal is to remove condition 8 in order to secure permanent planning permission for Greenham Reach Plot A – Elder Farm.

Condition 8

12. Condition 8 of planning permission 12/00045/MFUL, granted at appeal APP/Y1138/A/12/2181808, is as follows:

8) When the temporary dwelling hereby permitted ceases to be occupied by persons specified in condition 4 above, or on the date 5 years from the date of this decision letter, whichever is the sooner, the dwelling shall be removed, and the land restored to its former condition, in accordance with a scheme of work which has first been submitted to and approved in writing by the local planning authority.

13. It is proposed that condition 8 is removed in order to allow permanent permission for the holding.

¹ 12/00107/MFUL, APP/Y1138/A/12/2181821

² 11/02007/MFUL, APP/Y1138/A/12/2181807

Relevant planning and material considerations

14. The starting point for the legislative and policy framework from which this application should be viewed is section 70(2) of the Town and Country Planning Act 1990 which states:

“In dealing with such an application the authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations”.

15. Furthermore, section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

16. The propositions of law above are reiterated by the National Planning Policy Framework (NPPF) at paragraph 2. Therefore, it is possible for a development to be found to be in breach of elements of the development plan, but still be granted planning consent provided that the material considerations outweigh the breach.

The Development Plan

17. Extant local policy for Mid Devon comprises the *Core Strategy 2026* (adopted July 2007), *Allocations and Infrastructure DPD* (adopted January 2011 – NB: includes superseded policies), and *Local Plan Part 3: Development Management Policies* (adopted October 2013). Relevant policy is listed below:

- Policy DM10: Rural workers dwellings
- Policy COR18: Countryside

18. Emerging local policy for Mid Devon includes *Local Plan Review*; this was submitted in for examination in March 2017, the EiP had been scheduled to take place in September but has since been postponed at the request of Mid Devon District Council. Relevant emerging policy is listed below:

- Policy DM8: Rural Workers’ Dwellings
- Policy S14: Countryside

19. The wording of emerging *Local Plan Review* Policy DM8 is identical to extant *Local Plan Part 3* Policy DM10, and there are no proposed modifications to Policy DM8 in the *Local Plan Review Submission Document*.
20. The wording of emerging *Local Plan Review* Policy S14 is also similar to the policy it will replace, Core Strategy Policy COR18. The latter states:

Development outside the settlements defined by COR13-COR17 will be strictly controlled, enhancing the character, appearance and biodiversity of the countryside while promoting sustainable diversification of the rural economy. Detailed development control policies will permit agricultural and other appropriate rural uses, subject to appropriate criteria, as follows:

a ...housing essential to accommodate an agricultural or forestry worker...

21. It is notable that emerging Policy S14 updates ‘agricultural or forestry worker’ with ‘rural worker’:

Development outside the settlements defined by Policies S10-S13 will preserve and where possible enhance the character, appearance and biodiversity of the countryside while promoting sustainable diversification of the rural economy. Detailed development management policies will permit agricultural and other appropriate rural uses, subject to the following criteria:

a) ... housing essential to accommodate a rural worker...

National level planning policy

22. Relevant national level planning policy includes the National Planning Policy Framework (NPPF). Paragraph 14 of the NPPF refers to the “**presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision making” (emphasis in original).

KEY ISSUES

Introduction

23. As detailed in the discussion of the proposals above, the key purposes of this application are to:
- Gain a permanent tied permission for the holding
24. In support of this application we will first demonstrate that the proposals are consistent with the development plan, in particular the specific policy DM10: Rural workers' dwellings. Second, we will address the objectives and compliance of the proposals with the management plan. Finally we address other material considerations that are of relevance to the proposals. The main issues are summarised below:
- Compliance with the development plan
 - Compliance with the management plan
 - Other relevant material considerations

Compliance with the development plan

25. In this section we demonstrate that the proposals are consistent with relevant development plan policy.
26. The specific policy against which these proposals should be assessed is extant policy DM10: Rural worker's dwellings. As noted above the emerging policy DM8: Rural Worker's Dwellings is identical, and as such is likely to be adopted in that form.
27. We take it as given that should the proposals satisfy Policy DM10, that in turn extant Policy COR18 (and also emerging Policy S14) is also satisfied.
28. Policy DM10 is set out in two parts. The first part (criteria a-d) is of relevance as it addresses established rural businesses, and is set out with comment below.

Essential need

29. The first criterion of Policy DM10 is as follows:

Applications for rural workers dwellings will be permitted where:

a) It can be demonstrated that the nature and demands of an existing rural business are such that a full time worker has an essential need to be permanently resident at or near their place of work so they are available at most times;

30. For reference, the Inspector at the appeal found this criterion to be satisfied (attachment PA04):

31. Taking all of these considerations into account, I am satisfied that the requirements of the proposed smallholdings at Greenham Reach, which are considered here as integral components of the development proposals for the site as a whole, give rise to an essential need for a worker to live at each of those smallholdings.

31. The independent agricultural appraisal by Geo Ltd (attachment PA05) submitted in support of this application found the following:

4.1.5 This holding will work due to the ability to keep costs low and to attend to all the various aspects required to keep it going via a steady flow of work throughout the days of the week. This requires attending to one element after another, sometimes tasks being addressed simultaneously, and addressing many of these tasks at times considered to be outside the scope of a normal working day. As such we still believe 'that the labour intensive nature of such practices, necessary to ensure that a sustainable livelihood could be developed without resort to agro-chemicals and reliance on fossil fuels, would require the worker's presence and involvement to such an extent that the need could only be met by living on-site.'

4.1.6 We conclude that there is an essential need for these smallholders to be resident on the farm in order to continue to successfully farm utilising the low input, labour intensive systems they have established.

32. This approach was anticipated by the Inspector who noted (attachment PA04):

29. ...In this context it is not unreasonable that prospective tenants should adopt and seek to develop, as part of their business proposals, methods of pest-control, crop-care and eco-agriculture that both comply with this ethos and are proportionate to their particular small-scale enterprises. I accept that the labour-intensive

nature of such practices, necessary to ensure that a sustainable livelihood could be developed without resort to agro-chemicals and reliance on fossil fuels, would require the worker's presence and involvement to such an extent that the need could only be met by living on-site.

33. In our view this criterion continues to be satisfied.

Need cannot be met off-site

34. The second criterion of Policy DM10 is as follows:

b) The need cannot be met within a nearby settlement, or by existing housing at or near the site or through the conversion of a suitable redundant or disused rural building at the site;

35. There are two key points to make here. First, the essential need to live on the site has been demonstrated, and that therefore consideration of accommodation off-site would not be appropriate. Second, there are no suitable redundant or disused rural buildings at the site. In our view this criterion continues to be satisfied.

Scale and design

36. The third criterion of Policy DM10 is as follows:

c) The size and scale of rural workers dwellings will be commensurate with the scale of the operation and designed to reflect the location and setting of the proposed site.

37. There is presently no proposed change of dwelling. On this basis in our view this criterion is satisfied.

Financial soundness

38. The fourth criterion of Policy DM10 is as follows:

d) The rural enterprise has been established for at least three years, is currently financially sound, and has a clear prospect of remaining so.

39. The independent agricultural appraisal recently undertaken by Geo Ltd states (attachment PA05):

3.5.11 *The financial viability of the business is such that it has met the subsistence needs of the household from products produced on site using only herbal ingredients from the site in 2017/18 and is projected to exceed these substantially in 2018/19 and beyond.*

3.5.12 *It should be noted that there is no subsidy provided to this holding. Given the as yet unconfirmed subsidy changes this puts it on a good footing to survive any future volatility in farming support.*

4.6.1 *The projected profit and loss accounts demonstrate that the enterprise will produce a surplus of around £4,812 in 2017/18 with the applicants having drawn a further £9000 in wages to cover their household costs during the year. We therefore consider the business to be viable, profitable and able to support the needs of the household.*

40. On this basis in our view this criterion is clearly satisfied. We would also note that the Agricultural Appraisal additionally states (attachment PA05):

3.5.6 *Documents received by us since we carried out our appraisal confirm that the actual business performance figures in 2017/18 are better than those given in this appraisal and we understand that the lease for the site has now been purchased by the tenants due to an inheritance and therefore the rental costs are now zero.*

Compliance with the management plan

41. In this section we draw on ELC's Management Plan (MP) and Monitoring Reports (MR) to demonstrate Elder Farm's compliance with the MP requirements. As set out below the role of the MP was a material consideration in the Inspector's decision.

42. In summary, Elder Farm is fully compliant with the MP.

Role of the management plan

43. Part of the approved proposals was a management plan put together by ELC, and which has and continues to play an important role in the management of the holdings. Tenants of Greenham Reach are obliged by their leases to comply

with the requirements of the Management Plan, and which is monitored and documented by ELC (in the form of Monitoring Reports); this information is made available to the District Council and to the public. The role of monitoring was a point that the Inspector took into consideration at the appeal:

30. Moreover, the requirements and restrictions of the Management Plan, along with others contained in the leasehold agreements and the S.106 Undertaking, would be likely to deter prospective tenants who might simply be seeking a means of obtaining a dwelling in the countryside. Living a low-impact lifestyle and developing a symbiotic relationship with the land involves foregoing some of the normal trappings of modern day life while engaging in extensive, and at times very intensive, physical labour. I consider that the co-operative society's role in assessing applicants, and subsequently assisting and monitoring their progress, would also help to ensure that prospective tenants were genuinely committed to this type of rural enterprise.

Overview of compliance with management plan

44. In this section we set out the key objectives of the Management Plan (MP) and associated monitoring requirements (see MP at attachment PA06), and the summaries as set out in the most recent 2016-17 Monitoring Report (MR) (see attachment PA09) (for reference the 2014-15 and 2015-16 monitoring reports are also attached at PA07 and PA08 respectively):

- **Landscape character:** *'It is important that Greenham Reach will maintain and enhance Mid Devon's typical landscape character and features as well as the specific nature of the locality and site itself.'* (MR p. 8)
 - Comparison of the site's features with previous surveys and audits
 - Examination of condition of the hedgerows, riparian zone, and site's boundaries
 - Examination of structures and comparison with approved plans
 - Comments from Parish Council esp. visual impact

"We continue to be satisfied with the landscape character. Land use has changed considerably in the last four years. With a number of people now working on the farms every day, new habitats, significant amounts of production and tree growth across the three holdings, Greenham Reach is now a busy and bountiful cluster of small farm activity and wildlife." (MR p. 8)

- **Biodiversity:** *'The enhancement of the site's existing ecosystem and biodiversity.'* (MR p. 10)

- Ecological assessment by qualified professional

The farm is not only in compliance with the MP, but has made a significant contribution to local biodiversity. *"We have had two separate ecological reports commissioned this year. One is from Ecologic Consultants, who have been visiting for the last three years and making a more qualitative assessment, particularly of the MG5c meadow.*

The second was from Philip Wilson who co-wrote our first ecological report back in 2009; he was looking at overall changes since then. In summary, the natural ecosystems and wildlife remain well cared for and biodiversity is increasing."

Phil Wilson goes on to say *"These fields may now be of considerable local importance for nectar and pollen feeding insects and associated species"*.

"Both reports give a positive bill of health for Greenham Reach."
(MR p. 10)

- **Soil fertility:** *'To stimulate microbiological life in the soil and improve soil fertility, and then to maintain good soil fertility and microbiological life indefinitely.'* (MR p. 13)

- Soil testing across site
- Assessment of soil erosion
- Assessment of composting management (incl. compost toilets)

The soil has been well looked after. The regular soil testing programme indicates that it may well be improving, whilst also providing high levels of food production. *"We remain happy that the soil is being well cared for, with no sign of poisons, artificial fertilisers or erosion problems."* (MR p. 13)

- **Water:** *'Water is not only the basis for the ecological health of the site, its quality is important in order to avoid the potential for damaging contamination either of site water or of nearby watercourses.'* (MR p. 14)

- Bi-annual water testing
- Assessment of compost toilets and grey water treatment systems

Water is provided from on-site resources, and there are no pollution problems. The MP is being adhered to. *“Water quality is good at Greenham Reach. The council water tests this year were passed and there is no sign of any contamination problems either on the holdings or downstream.”* (MR p. 14)

- **Energy, Carbon Emissions and Bio-Sequestration:** *‘Sustainable development requires that households use significantly less fossil fuel... the ELC [also] aims for its sites to be exemplars of bio-sequestration (the absorption and storage of carbon dioxide).’* (MR p. 15)
 - Inspection of on-site electrical energy generation
 - Inspection of heating
 - Measurement of soil carbon

Energy is provided from on site renewable resources. The site as a whole remains a good example of bio sequestration, and overall low fossil fuel use

“Total power generated to date: 13505kwh. The holdings have used between 1300 and 2300 kwh each, and the communal use has been 4741kwh on powering tools and fridges.” (MR p. 15)

- **Ecological Footprint Analysis:** The Footprint Assessment shows all residents are below average for their ecological footprint.

“On average, taking all three households together, the per capita Ecological Footprint is 2.33 gha which is around 46% of the most comparable average UK Ecological Footprint [of 5.1gha]. The ‘One Planet’ Ecological Footprint which would represent a sustainable lifestyle is around 1.7 gha . Clearly the households at Greenham Reach are much closer to achieving this goal than the average UK citizen. To achieve this goal they would need to reduce their average Ecological Footprint by a further 28%.” (MR p. 16)

- **Animal husbandry:** *‘The ELC believes that animals should be managed with care for their welfare and health. As set out by The Farm Animal Welfare Council, animals should be managed in such a way that they enjoy the “five freedoms” (freedom from: malnutrition; physical discomfort and extremes of temperature; injury and disease; fear and distress; and unnecessary restrictions of behaviour).’* (MR p. 17)
 - Condition of animals, stocking density, land & housing for animals

“There have been no reports of animal mistreatment or cruelty. The animals here remain well cared for and the MP is being adhered to” (MR p. 17)

- **Construction:** *‘Constructed dwellings should meet at least Level 4 of the Code for Sustainable Homes’ (MR p. 18)*
 - As structures are built they will be assessed against measures set out in the reversibility statement
 - As structures are built, where relevant, ELC will appraise extent to which Code Assessor’s recommendations were incorporated

The Code for Sustainable Homes was withdrawn and *“the smallholders have not constructed permanent dwellings.” (MR p. 18)*

- **Annual open days:** *‘The objective of the annual open day is to spread understanding of the ELC’s approach to sustainable agriculture and living.’ (MR p. 18)*
 - Brief report on annual open days

The annual programme of Open days have continued to be a real success, with clear benefits for the smallholders and the local consumers and community who visit. *“The last Open day was held on September 30th 2017. It was successful and well attended by approximately 75 people. Many local people came to see the source of the produce that they had been buying. It was great to hear their enthusiasm for the farms and the food produce on them for local consumption, and for all parties to feel an increasing level of connection to the local community.” (MR p. 18)*

- **School visits:** *‘Sharing the ELC’s approach to sustainable agriculture and low impact living.’ (MR p. 18)*
 - Brief report on school visits

Greenham Reach continues to hold visits for local schools, which have been greatly valued by the farms and the children. *“There were two successful school visits in the summer of 2017. Appley primary school brought around 15 children and Stawley primary school came with 20 children. The youngsters took part in a range of activities; looking at how different food came from different*

parts of the farm, and the different sensory experiences of a range of products.” (MR p. 18)

- **Transport:** *‘The project provides an integrated livelihood and residential scheme which will by its very nature result in a low traffic development. However, smallholders will be limited on the number of vehicles on site and number of vehicle journeys.’ (MR p. 19)*
 - During ELC’s visits to site, incl. annual audit, number of vehicles on site will be recorded
 - Traffic counter data will be provided

The restriction on vehicle numbers has been adhered to. The amount of vehicle journeys has risen slightly above the target figure for this last year and ways to reduce traffic movements have been discussed with the smallholders. The number of journeys remain below the average figure for a rural household, and the figures also reflect the success of the holdings and their economic activity. Our electronic monitoring does not allow us to separate out the figures for different holdings. The overall objective of being a 'low traffic development' remains adhered to.

- **Common areas and facilities:** *‘The common parts and shared facilities... are provided by the ELC in order to support smallholders in developing and managing their business. The common parts within the site remain outside of individual holdings and are maintained by the ELC in accordance with the lease.’ (MR p. 20)*
 - n/a

Common facilities remain within the freehold of ELC. The access track around the three holdings was recently completed.

“Thanks to a grant from Lush the track was installed in a loop that starts and ends at the communal barn and greatly improves access to Steepholding and Wild Geese Acres, particularly in winter. The barn continues to be well used, housing tools, the solar electrics and water filtration system, machinery, communal refrigeration, as well as collecting rainwater for the water system.” (MR p. 20)

- **Land-based livelihood:** *‘The ELC exists to support the creation of land-based livelihoods. Land-based livelihoods at Greenham Reach are to be*

the growing of crops for personal use and sale, and/or the keeping of livestock and/or bees for personal use and/or for sale.’ (MR p. 21)

- Monitoring of the businesses’ annual accounts
- Tenants’ reports on number of full-time equiv. employees working on holding and living in household

All holdings are complying with the MP and remain supporting a land based livelihood.

“All the smallholdings continue to grow and produce well. We are happy that the holdings are beginning to ‘bed’ into the landscape more and that income levels are increasing for all of them.

All holdings are now making a profit and all holdings have at least one full-time equivalent person active on the farm, in line with the requirements of the lease.” (MR p. 21)

- **Dwellings tied to small-holdings:** *‘The three temporary dwellings at Greenham Reach are to stay tied to their land holding.’ (MR p. 25)*

- Report on any non-compliance

“The dwellings are all still tied to their holding, in accordance with the site planning permission.” (MR p. 25)

- **Discounted, affordable lease price, including resale:** *It is central to the ELC’s approach that the initial purchase of the lease, and its resale, will be at an affordable price.’ (MR p. 25)*

- Report where applicable

There has been no re-sale of the holdings, so the MP is not applicable here.

“As last year, we are not yet in a position to comment on the affordability of the leases relative to smallholder income, as the businesses are still in an early stage of development. We look forward to reporting on this aspect more fully in subsequent annual audits.

In the period covered by this report none of the original smallholders sold their smallholding. We are satisfied that the site management complies with the Management Plan in this area.” (MR p. 25)

- **Monitoring, Action Plans, and Breaches** (MR p. 25)
 - Statement as to why ELC has deemed there has/ has not been a breach of the MP requirements.

There have been no breaches or problems within the MP this year. Last year there was an Action Plan process in operation following earlier questions about levels of agricultural production on one holding in their first full year. Those questions have been satisfactorily answered now, as recent business figures show. The Action Plan process itself was helpful to both ELC and the holdings in demonstrating areas where it could be improved.

We will be evaluating the Management Plan and the system of reporting breaches over the coming year.” (MR p. 25)

Elder Farm

45. Elder Farm was the last of the three smallholding families to establish at Greenham Reach. They signed their lease in December 2014 and moved onto the site in spring 2015.
46. As noted above ELC has previously worked with Elder Farm via an Action Plan (details are set out in the 2014-15 MR (PA07, p. 23) and the 2015-16 MR (PA08, p. 19).
47. A summary of Elder Farm’s activities are set out below (2016-17 MR, attachment PA09, p. 22):

“Work on the smallholding has increased again this year, with a great display of herb and flower varieties in high summer. In particular the acre of field scale herbs has come into production, and this has recently resulted in a contract to supply bulk dried herbs for a major herb buyer. An additional polytunnel is now in use, to allow more flexibility and production in covered space.

The long perennial beds have seen a mixture of varieties: yarrow, echinacea, calendula, thyme and other popular herbs. They have also created a drying room for their produce, the lack of which was a significant barrier last year.

The range of flowering plants such as phacelia, sunflowers and calendula (pictured below) has been great for insect life and there is now a bee hive to help take advantage of this.

Some of the elder trees have been moved due to soil conditions and slow growth. Commercial production from these will not be significant for a few years so this needs to be factored into the business planning.

Sales of medicinal herbs have been good and together with the addition of products like the cough syrup and teas have seen a profit this year.”

48. In summary the holding is compliant with the Management Plan.
49. Should Elder Farm not fully satisfy the restrictions and requirements of the MP, then an action Plan would be collaboratively formulated with ELC in order to support the holding to meet not only their goals and the requirements of the MP, but also of the relevant planning conditions.

Other material considerations

Research carried out

50. The Inspector for the appeal was clear that weight was given to the contributions that Greenham Reach would make to research into the viability of low-impact livelihoods:

34 ...I attach much greater weight to the material consideration that the proposed development would have substantial benefits in terms of not only its own sustainability credentials, which are considerable and are not disputed by the Council, but also the contribution it could make, through facilitating much-needed research, to informing and improving future developments in the field.

51. By way of demonstrating that objective is being met below is a list of research carried out in association with the work at the site:

Journal Articles and Books

Ajates Gonzalez, R. (2017) *Going back to go forwards? From multi-stakeholder cooperatives to open cooperatives in food and farming*, Journal of Rural Studies, Volume 53, July 2017, Pages 278-290

- Duncan, J & Bailey, M (2017) *Sustainable Food Futures: Multidisciplinary Solutions*, Routledge Studies in Food, Security and the Environment. Routledge.
- Laughton, R (2017) *A Matter of Scale, A study of the productivity, financial viability, and multifunctional benefits of small farms(20 ha and less)*, CAWRS, Coventry University
- Wach, E. (2017) *Why access to land is vital for sustainable, healthy and fair food systems: Strategies for increasing access to land for agroecological farming*, Brighton: IDS
- Maxey, L & Henfrey, Tom & Chamberline, S & Bird, C & Gonzalez, J. (2015) *Radical civic transitions: Networking and building civic solutions*. 14. 431-441.
- Thorpe, D (2015) *The 'One Planet' Life: A Blueprint for Low Impact Development*, Routledge.

Dissertations

- Hart, S (2017) *Forward-to-the-Land: Land Rights and Reform for a New Rural Economy*, MA Economics for Transition, Schumacher College and Plymouth University
- Soucek, N (2014) *Contested Utopias: Low Impact Development & The Planning System in England*, MA Town & Country Planning, University of the West of England

Ecological Surveys

- Brown, S. (2014) *Ecological Site Assessment & Monitoring of Greenham Reach*, ELC
- Gibbons, H. (2015, 2016, 2017) *Ecological Site Assessment Greenham Reach*, ELC
- Wilson, Dr. P. (2017) *An Ecological Assessment of the Environmental Land Co-operative Holding at Greenham Reach*, ELC
- Knight, W. (2013, 2017) *Ecological Footprinting*, ELC

Internal Documents (not published)

- Proctor, J. (forthcoming) *New Economic Models for Land: Agroecological small farms and the National Trust*

Conclusions

52. We are of the view that the proposal fulfils the requirements of the development plan, and as such constitutes appropriate and sustainable development.

Yours faithfully,

Dr. Simon Ruston MRTPI