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LPA: Mid Sussex District Council

Planning Officer: Anna Tidey

Planning Reference: DM/24/1931

Proposed Application: Application to retrospectively apply for a mobile home and hardstanding for the continued care of livestock on site and management of land.

Site Address: Burleigh Oaks Stables East Street Turners Hill West Sussex

Dear Anna,

We have reviewed the above planning application that was submitted by Stephen Langer of Stephen Langer Associates Ltd on behalf of D Hill-Upperton of Rod Gaskin Ltd, The Old Straw Barn Cuckfield RH1 5BG relating to the application to retrospectively apply for a mobile home and hardstanding for the continued care of livestock on site and management of land at Burleigh Oaks Stables, East Street, Turners Hill, West Sussex.

This appraisal is based on written information received for the planning application as provided by Mid Sussex District Council and supplementary information provided by the applicant following the initial appraisal. ADAS has not conducted a separate site visit.

Agricultural Consultant's Appraisal

Background

The applicant wishes to apply retrospectively for a mobile home and hardstanding for the continued care of livestock on site and management of land. This is a new business with no accounts. Initially stocking on the land is 30 and 200 laying hens, which are housed in mobile Eglu Chicken Coops.

With the additional information there was a spreadsheet showing income and expenditure along with a Profit and loss assessment and Balance Sheet covering the first 5 years of operation. In addition, there was a document that provided additional information.

These documents raise more questions than they answer. The supplementary document now states the following:

'In the Design and Access Statement, the need for the mobile home is shown and justified to continue the necessary husbandry associated with caring for livestock. This is part of the wider agricultural enterprise that is carried out. However, following the ADAS report, there is a misunderstanding regarding the concept of a 'dwelling' rather than a 'welfare unit'.

The Mobile Home

The unit is currently in situ, aiding the agricultural enterprise by providing appropriate welfare facilities to be used on site for employees of the business. This includes hygienic hand washing facilities, toilets, overnight accommodation when is necessary for aiding the agricultural operations and seating for meals outside of the rain. The rear section is also able to be utilised for administrative purposes.

This site is the hub of operation for the agricultural enterprise totalling 106 acres in its entirety.'

The applicant is now suggesting that the mobile home is a welfare unit to provide facilities for the two-volunteer staff, but the statement does mention overnight accommodation so is it a dwelling or not? A Welfare unit to me is a room where there are lockers for staff belongings, hand washing facilities, a kettle and microwave, table and chairs plus a toilet. It does not have the facilities to sleep. Some welfare units might also have a shower depending on the work being done.

The initial application stated that business rents 20 acres land (8 ha) and is run by two volunteer staff, but now the area of land has increased to 105 or 106 acres depending on whether you read the supplementary document or the cashflow.

The supplementary information then goes onto to state the following:

'Man Days

Although the calculation for 'man days' set out within the John Nix Pocket book is right, this is again for justification of a dwelling to be on site, which this application is not seeking. There are, however, other considerations that should be included to further show the need of the welfare unit.

Work required	Estimated man days
<i>Repair and replace fencing</i>	30
<i>Replacing entrance gates</i>	5
<i>Crowning and cutting back trees</i>	25
<i>New water pipes</i>	5
<i>Repairs to ancillary buildings</i>	40

TOTAL	105
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This accounts for 63 working weeks, well over a year, if all the necessary work was carried out contiguously.'

I am afraid I am a little lost with the statements about the work stated in the table above for fencing, gates, crowing and cutting back trees, laying new water pipes and repairs to buildings as the cashflow provided in the excel spreadsheet shows no costs for the purchase of any of these items over the 5 years for which data is provided.

The only capital expenditure listed in the cashflow other than for livestock is a 14-foot livestock trailer at a cost of £5,382. Therefore, I beg to ask the simple question as to how are the materials for fencing etc going to be paid for?

Furthermore, I am not sure how the applicants' agents get from a table stating that the works listed require a total of 105-man days to 63 working weeks. Given a working week is 5 days then 105-man days is 21 weeks work for one person, which once completed will not be done again for a lot of years and this the 2 weeks of fencing and general maintenance works cannot be used to justify the mobile home/welfare unit.

Labour Requirement

Given the new information provided by the applicant I have redone the calculations of labour required for the farm. It is normal practice to determine the labour requirement in Standard Man Days using information from the John Nix Pocketbook 54th edition 2024.

The following table shows the standard man days required for the stocking and land area provided by the applicant and the numbers used are those for year 5 when sheep number are at their maximum:

Stock	Number	Standard Man Days /head/hectare	Total Standard Man Days
<i>Sheep</i>	<i>133 ewes</i>	<i>0.5</i>	<i>66.50</i>
<i>Rams</i>	<i>3</i>	<i>0.5</i>	<i>1.50</i>
<i>Laying Hens- Free range*</i>	<i>200</i>	<i>0.06</i>	<i>12.00</i>
<i>Grass Grazing</i>	<i>42 ha</i>	<i>0.4</i>	<i>16.80</i>
<i>Sub Total</i>			<i>96.80</i>
<i>Maintenance</i>	<i>Add 15% to cover maintenance</i>		<i>14.52</i>

Total			111.32

*Laying Hens feature in the written submission, but not in the cashflow.

The Standard Man Days are based on an 8-hour day, and it is assumed that one labour unit works 2200 hours per year or 275-man days per year.

Therefore, using the data for the stocking and cropping on the holding of 111.32 standard Man days the unit has a labour requirement of 0.41 labour units.

Given the number and type of stock farmed by the business there is no justification for a dwelling to be on the site. Welfare facility on the site will be required but having not visited the site I cannot say if there are already suitable buildings on site in which the facilities can be located.

Financial viability

Since the original appraisal of the application further information has been provided by the applicant's agent including a cashflow statement.

There are several items missing from the cashflow statement.

- Loan interest (Loan of £175,562 listed under the Balance Sheet Tab Line 50)
- Bank Charges
- Bank interest charges on current account
- Accountancy fees
- No Consultancy fees – Agent who has done planning application needs paying.
- Depreciation – Trailer purchase all put as depreciation in year one
- Ongoing Repair costs on the trailer
- Income from Lying Hens
- All expenditure relating to laying hens
- No capital expenditure for fencing, water pipe building repairs- There will be materials required such as fence posts and wire, water pipe etc.
- No costs for Tree Capping and cutting back
- No labour costs
- No machinery purchases
- No machinery running costs
- No contractor fees for hedge cutting etc.
- No costs for property repairs
- No seed costs

- No fertiliser costs
- No spray costs for Docks, Thistles etc in grassland
- No sundry costs
- No straw costs for bedding at lambing
- No costs of Haulage of lambs to Slaughter and no costs for delivery of meat.
- No marketing costs.
- No packaging costs for meats
- No costs for refrigeration etc.
- No income of expenditure relating to bee management. (If you take honey you need to feed the bees)

Looking at some of the costs listed in the cashflow a number to me seem to be on the very low side. For example, insurance is listed at £2,160 per annum.

In the initial application, the applicant provided farm performance data for the 200 laying hens. They state that the hens lay an average 0.6 eggs per bird per day which generates an income of £12,500 per annum.

200 birds x 365 days x 0.6 eggs per day equates to 43,800 eggs produced per annum or 3650 dozen eggs.

The eggs sales from 3650 dozen are £12,500 which makes a dozen eggs worth £3.42 per dozen, with costs confirmed in the supplementary data as £4,530. Although eggs sales are in the supplementary document there is nothing in the cashflow relating to birds.

Given that the balance tab of the spreadsheet lists a loan of £175,562 (line 50) then at an interest rate of 6% the annual capital and interest repayment would be £130 per thousand borrowed over 10 years. Thus, the annual interest and capital repayment over 10 years would be £22,433 per annum. The business even in year 5 according to the cashflow will not generate the required income to repay the loan

Planning Consultant's Appraisal

The National Planning Policy Framework (the 'NPPF') 2023 sets out the planning policies for England and how these should be applied in the determination of planning applications.

NPPF Paragraph 84 states that planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the provided list of circumstances apply. Point a) of this list refers to where 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.

NPPF Paragraph 85 indicates that planning decisions should help to facilitate the expansion and adaptability of businesses, whilst also taking into account local business needs and wider opportunities. Furthermore, Paragraph 88 of the NPPF states that planning decisions should enable the sustainable growth and expansion of businesses in rural areas, in addition to promoting rural diversification.

NPPF Paragraph 89 states that planning decisions should recognise that sites needed to meet local business needs may have to be found adjacent to or beyond existing settlements. This has been considered in relation to this Application.

As stated within the agricultural consultant's assessment, it is considered that there is not a robust business case for the development. As a result of this, it is considered that this application is not supported by the above paragraphs of the NPPF.

In regard to local policy, it is considered that Policy DP15 New Homes in the Countryside of the Mid Sussex District Plan is relevant to this proposal as this addresses rural workers dwellings. Policy DP15 states that permanent agricultural (includes forestry and certain other full time rural worker) dwellings will only be permitted to support existing agricultural activities on well-established agricultural units where it meets the relevant criteria, including where:

- The need cannot be fulfilled by another existing dwelling on or any other existing accommodation near the agricultural unit; and
- It can be proven that it is essential for the proper functioning of the enterprise for one or more workers to be readily available at most times; and
- It can be proven that the farming enterprise is economically viable; and
- It can be proven that the size of the dwelling is commensurate with the established functional requirement of the agricultural unit.

As stated above, ADAS has not carried out a site visit and as such is not in a position to comment on the above considerations. However, it is noted that Policy DP15 mirrors the position of the NPPF in regard to demonstrating an essential need for the agricultural workers dwellings, and as such we consider that this proposal conflicts with Policy DP15.

Conclusion

We consider that the business has not justified the requirement for people to be on site. There is a requirement for the business to provide provision on site for staff welfare, but we have doubts over whether a mobile home is the appropriate format.

In the final section of the supplementary document the following comments are made:

'Marketing of the produce will utilise word of mouth and online which is working effectively within the community.'

- *All produce that is not sold will be donated to the local charity that feeds Brighton's homeless community.*
- *As the enterprise grows, the goals of the business are to expand and grow vegetables with another local farmer (supporting collaborative farming) for produce to be sold to London restaurants.*
- *The applicant is keen to invite local schools and businesses to the site to help expand their knowledge and understanding of farming and the good it does within our communities as well as where food comes from.'*

Although these objectives are all valid these will require investment in suitable facilities especially for school children to attend. There is also uncertainty regarding where the funding would come from, and how it will be repaid.

The spreadsheet provided a cashflow forecast. There are several errors in the Profit and Loss and balance sheet and significant pieces of information have been missed out. The cashflow appears to have no value and we consider that the business will not generate sufficient profits to meet the loan repayments over 10 years.

At some point the business will need to employ staff as the business cannot run on the efforts of two unpaid volunteers. Further to this, we deem that at the current level of profitability there is no funds to pay wages.

We conclude that the business is not viable based on the information supplied by the applicant. There is no labour justification for the granting of the planning permission for a mobile home providing sleeping facilities. A welfare unit could be justified, but this could potentially be met in existing buildings or a portacabin and mobile hired in toilet if necessary.

Yours faithfully

Stephen Watson
Principal Agricultural Consultant

Evan Williams
Planning Consultant