

23 September 2021

Steven Stroud  
Strategic Projects and Delivery Manager  
Mid Suffolk District Council

By email only

Dear Steven

**Re: Application 21/01735 Wakelyns**

We appreciate the time taken by members of the Planning Committee, Philip Isbell, Jasmine Whyard, and you in visiting Wakelyns and in discussing our planning application with us.

This letter sets out a series of amendments to the planning application, along with proposals for additional voluntary controls on activities at Wakelyns. They address the points made by consultees both about this planning application and about unconnected other things on site (including all the points made about impact on local amenity).

**Amendments to planning application**

Points have been made about the possible visibility of pods and mobile homes from the public footpath, and about their relationship with the listed Wakelyns farmhouse.

Attached to this letter is a replacement plan 19/029 MH-GP-A by which we have:

- (1) Reduced the area within which the mobile homes are to be sited to remove the Southern section, of which there might have been occasional views through gaps in the hedge. (As it happens, we will in any event undertake additional planting this winter to reinforce those and the other relevant hedge boundaries.)
- (2) Reduced the area (by adding a 25metre standoff from the Eastern boundary) within which the pods might be sited, thus ensuring they are entirely within our tree alleys (as to which see further below). (Again, we will in any event undertake further planting along that boundary.)
- (3) Reduced the area within which pods might be situated so that they will never be close to the listed farmhouse.

As noted further below, each mobile home will be also separated from the site boundary by bespoke visual screens made of natural materials (willow/hazel) from the Wakelyns site.

Those changes should completely remove any concerns about visibility or landscape impact. Independently of those amendments, can I also formally withdraw that element of the planning application which proposed changes to the 'East Block' area within the farmyard (as seen in 19/029/BP/E, 19/029/B-EW/1, 19/029/P/B-EW, 19/029/B-EW/2).

Those changes are also reflected in the attached replacement plan 19/029-SLP in amendments to the planning 'red line'.

#### Conditions/Section 106

We propose the following in addition to what has already been considered in the Committee Report:

1. Pods will be in accordance with the statutory definition of a caravan (which specifies the footprint and maximum internal floor-ceiling height) and with the floor no higher than 0.75m above the ground and with any roof pitch adding no more than 0.75m to the internal floor to ceiling height.
2. Pods will only be used within those cropping alleys which are in their 'fertility building ley' phase, within an organic rotation agroforestry system in which the tree lines are managed so that tree lines secure a visual barrier between adjacent tree lines.
3. Pods will always be placed at least 10 metres apart when in use.
4. Each pod will be moved at least every two months between April and September to ensure there is no material adverse impact on the organic rotation agroforestry farming.
5. Mobile homes will be in accordance with the statutory definition of a caravan (which specifies their footprint and the maximum internal floor-ceiling height) and with their floor no higher than 0.75m above the ground and with any roof pitch adding no more than 1.5m to the internal floor to ceiling height.
6. Visual screens made of natural on-site materials will be erected between mobile homes and any adjacent site boundary.
7. The section 106 agreement will secure a Management Agreement which will potentially cover the following topics (all of which we are/would be doing anyway, and little of which arises from the planning application):
  - a. Events involving more than 20 people will be by pre-booking only to allow visitor parking/routing/etc as below.
  - b. Arrangements will be put in place to notify local parish councils and others in advance of such events.
  - c. Parking for all events/activities will be entirely contained within the overall Wakelyns site. Areas will designated/signed in accordance with the pattern and requirements of the organic rotation.



- d. Consideration to be given for such larger events to vehicle phasing/timing.
- e. Consideration to be given for such larger events to routing all visitor vehicles via our field headlands to avoid visitor use of the section of Metfield Lane which serves neighbouring properties. (Although that is not something which vehicle volumes would justify or which has been asked for by the Highways Department, it is something we have successfully trialled and which we are happy to offer for consideration in response to the concerns of others.)
- f. Hedges on site boundaries to be managed and reinforced to ensure separation between areas for mobile homes and pods and the surrounding PROW.
- g. Potable (drinking) water supplies to pods/mobile homes will be from the mains supply via MDPE piping (as for normal farm/field activities)
- h. Foul water from pods/mobile homes will be disposed of in on-site waste treatment plants (which are to be regularly maintained/serviced).
- i. All other waste to be appropriately recycled/disposed of.
- j. Electrical supplies to pods/mobile homes to be via identified field distribution points.
- k. Rules for the use of fire bowls in conjunction with pods.
- l. Late night noise rules.
- m. 24/7 on-site duty phone contact advertised via web site and Google maps.

At the Planning Committee meeting, there was discussion about whether (as I had volunteered at that meeting) we should also be required to install a passing place on Metfield Lane. That work is being completed in the next few days in any event.

Mobile Homes

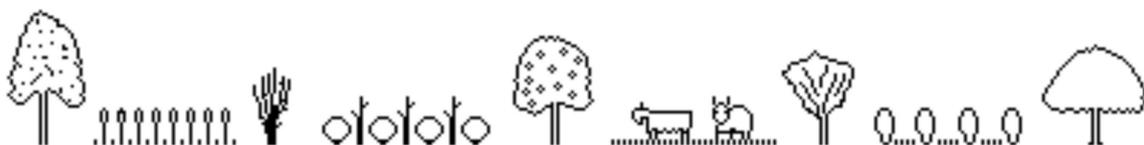
For completeness, I also attach a document which brings together in a single place the policy and factual explanation and assessment relating to the mobile homes which we have previously discussed in a more piecemeal way with council officers. We hope that will be of assistance.

Let me know if any of that needs further clarification or explanation.

Best wishes



David Wolfe





DO NOT SCALE - IF IN DOUBT ASK

**Additional Notes**  
 Area for glamping pods to be min 75 m from Farmhouse.  
 Area for glamping pods to be min 25 m from eastern boundary

KEY	
	Indicates area for mobile homes. (see Note 1)
	Indicates area for 1 mobile home. (see Note 1)
	Indicates area for glamping pods. (see Note 2)
	Denotes direction of flow - Farm drainage ditch

- NOTES**
- MOBILE HOMES - Up to 6 Number**  
 10.668 x 3.048 m maximum external dimensions (average size)  
 Internal floor to ceiling height not to exceed maximum of 3.05 m  
 To be manufactured to be deliverable to site on a lorry, in no more than 2 no sections, and capable of removal.  
 Not to be permanently affixed to the ground, and connected only be services
  - GLAMPING PODS - Up to 12 number**  
 3.660 x 2.441 m (internal dimensions)  
 Internal floor to ceiling height not to exceed maximum of 3.05 m

For the uses of the farm buildings see drawings 19/029/BP/E (as existing) and 19/029/BP/P (as proposed)

**DAVID HOUCHELL LTD**  
 Building Design and Planning Consultants  
 The Building and Design Centre  
 Grundisburgh Road  
 Woodbridge, Suffolk, IP12 4HG  
 Tel: 01394 388388. Fax: 01394 380010  
 E-mail: houchell.design@btinternet.com

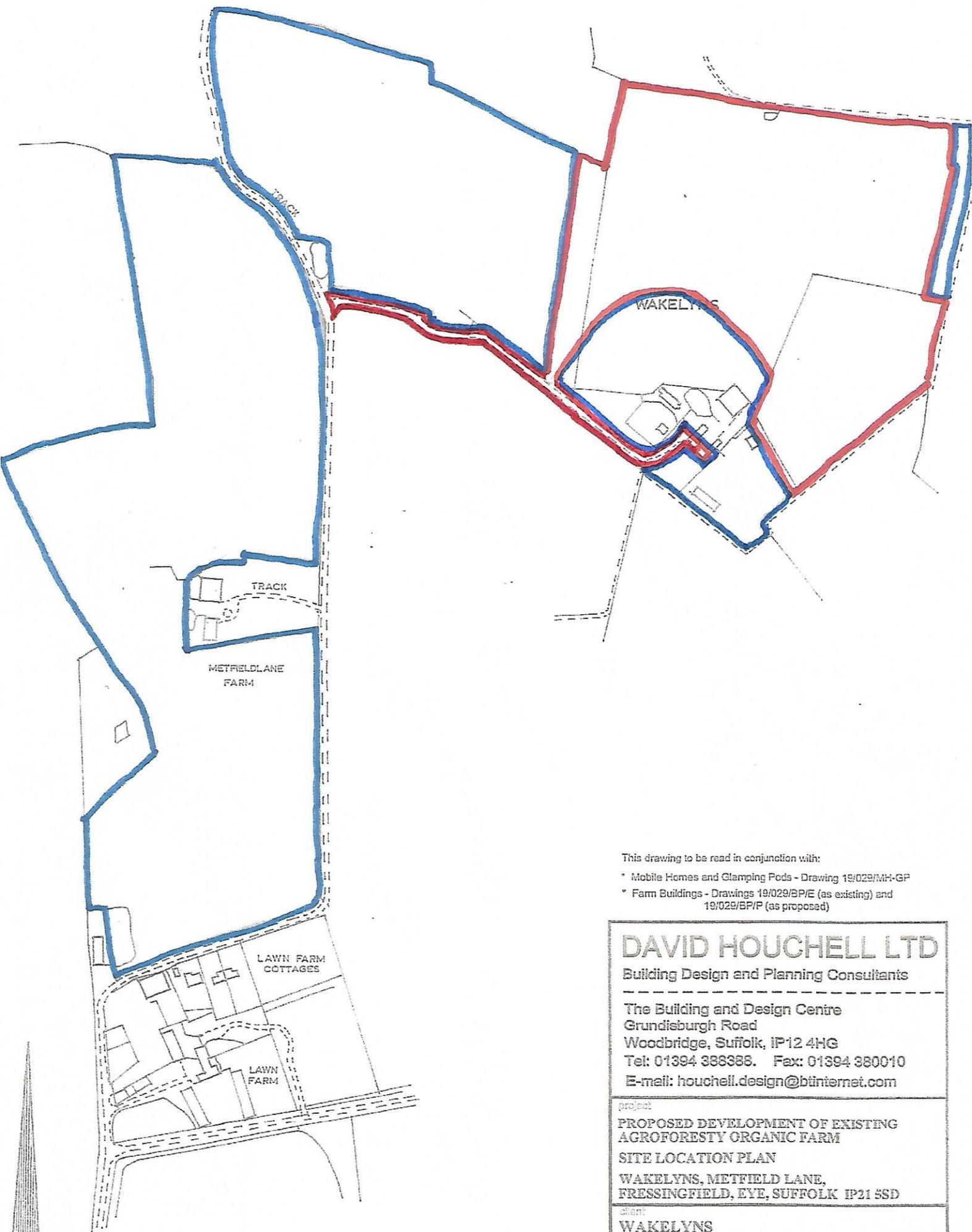
project  
**PROPOSED DEVELOPMENT OF EXISTING AGROFORESTRY ORGANIC FARM**  
**PROPOSED LOCATION OF MOBILE HOMES AND GLAMPING PODS**  
**WAKELYNS, METFIELD LANE, FRESSINGFIELD, EYE, SUFFOLK IP21 5SD**

client	<b>WAKELYNS</b>	
scale	date	drawing no
1 : 1250 @ A3	MARCH 2021	19/029/MH-GP <sup>A</sup>

block plan  
 scale 1:1250

A; 14.09.2021 Planning amendments added

© This drawing is copyright



site location plan  
scale 1:2500

This drawing to be read in conjunction with:

- \* Mobile Homes and Glamping Pods - Drawing 19/029/MH-GP
- \* Farm Buildings - Drawings 19/029/BP/E (as existing) and 19/029/BP/P (as proposed)

<b>DAVID HOUCHELL LTD</b>		
Building Design and Planning Consultants		
-----		
The Building and Design Centre Grundisburgh Road Woodbridge, Suffolk, IP12 4HG Tel: 01394 388388. Fax: 01394 380010 E-mail: houchell.design@btinternet.com		
project		
PROPOSED DEVELOPMENT OF EXISTING AGROFORESTRY ORGANIC FARM SITE LOCATION PLAN WAKELYNS, METFIELD LANE, FRESSINGFIELD, EYE, SUFFOLK IP21 5SD		
client		
WAKELYNS		
scale	date	drawing no
1 : 2500 @ A3	MARCH 2021	19/029/SLP

## Attachment: Mobile homes at Wakelyns

This document brings together the analysis and information previously discussed with MSDC planning officers. They have recommended the grant of planning permission.

### Summary

Overall:

- Wakelyns' Organic Agroforestry System is an internationally-renowned farming and scientific demonstration site which has inspired many farmers and policy makers globally. Everyone agrees it must be maintained and continued.
- However, the agroforestry at Wakelyns was not planted in a way intended to make it operationally or financially sustainable. It relies on a subsidy of £25,000-£40,000 per year which previously came from my parents and from scientific research income. Those sources of subsidy are no longer available. But the costs (principally 5 contract agricultural workers/arborists) continue. Wakelyns needs to generate other income to cover the shortfall if those jobs and the organic agroforestry are to be sustained.
- People staying in pods to attend courses and take part in other activities at Wakelyns are to be the main source of that other income.
- The people who comprise the 6-12 enterprises which are to be hosted on site will be essential for running those courses and activities (including teaching on them and feeding attendees); also, for making better use of the produce from the organic agroforestry, and for ensuring the overall proper operation of the site.
- Those enterprises will all be directly connected to and reliant on the farming and forestry at Wakelyns. They will provide significant additional employment and opportunities for rural businesses for the people involved. We are proud to be able to offer such opportunities as part of the overall Wakelyns proposal.
- However, the operational requirements of those enterprises (for example in the very long hours worked by bakery staff and growers, or in the need to oversee and protect horticultural planting etc), and/or in the fact that none of them will generate sufficient income to allow the workers to rent accommodation in the local area, means that Wakelyns need to be able to offer many of the people involved the option of accommodation on site.
- The people in question will all be involved in agriculture and/or forestry. As many mobile homes as were needed for seasonal agricultural or forestry workers could be placed anywhere at Wakelyns without planning permission. This planning application is only needed because the agricultural and forestry workers in question are more than seasonal.

- The officer recommendation for the grant of planning permission (to allow use of mobile homes this way while the need for them continues) recognises that it fits with the applicable planning policies.

#### Permitted development rights for seasonal workers

Mobile homes used only by seasonal agricultural and forestry workers would not require planning permission. Provided that the units were placed at least 6 metres apart, then as many as were needed could be located anywhere on our overall farmland (including immediately adjacent to other houses) without a planning application and without any additional requirements or controls, such as for visual screening.

Each of the 6 units we propose here will be occupied by at least one person involved in agriculture or forestry. We only need planning permission because their usage will not just be 'seasonal'. However, their impact will be much less than would be that for seasonal workers accommodation because it will be in a screened area well away from any other properties (rather than potentially being dispersed across the farm as accommodation for seasonal workers could be).

#### The planning policy context

Much of the area we propose for mobile homes is within Fressingfield, such that policy FRES1 applies. Policies CS1, CS2, H10, and H11 of the MSDC Development Plan apply to the whole area.

All of them operate within the context of policy NPPF 80(a). That Government policy specifically allows for the development of homes in the countryside including where a rural worker needs to live at or near their place of work in the countryside.

The restriction it creates is most directly concerned with proposals to build permanent new homes. The situation here is clearly very different to that: what we propose is not the permanent building of new permanent homes, it is the siting of 'caravans' in circumstances where (as we have proposed) those caravans would be removed if the need for them no longer existed.

#### The imperative of sustaining the organic agroforestry at Wakelyns

In almost all instances where the policy considerations above are being applied, the "need" question arises from a choice by (for example) the farmer or landowner. Thus, for example, a farmer chooses to have pigs and then explains that, in the light of that choice, it is necessary to have on-site accommodation for rural workers.

The position here is very different. Our starting point is that the organic agroforestry at Wakelyns is long-established. We are not making a choice about whether to embark on agroforestry in the way that a farmer might be deciding to start or expand a pig operation.

That matters because the people who have commented on our plans agree that the Wakelyns organic agroforestry (and presumably the employment it sustains) needs to

continue and be secured for the future. It is a bit like inheriting a working antique windmill or steam museum with staff in a rural location: as everyone appears to agree, we must do what is required to keep operational what is essentially a heritage asset. And that requires further income streams at Wakelyns.

#### Wakelyns needs somehow to generate income to subsidise the organic agroforestry

The problem is that the Wakelyns organic agroforestry is not financially or operationally sustainable on its own. That arises because it was planted and run by my parents (from 1994) as a series of small experimental/demonstration sections of agroforestry. Each needs to be managed in a different way, which adds cost/complexity and reduces yields. Decisions were made about the planting (such as in planting some tree lines just 12 metres apart) which have turned out to add cost compared to what could now be achieved elsewhere, at scale.

Other farmers have come to Wakelyns from all over the world to look at, and learn from, its approach to commence agroforestry farming on a much bigger (and thus commercially successful) scale. Meanwhile, Wakelyns remains as the oldest most diverse agroforestry system anywhere, certainly in the UK and probably beyond.

The inescapable reality though is that, allowing for labour costs (we have two contract farm workers plus paid input from arborists and others), fuel, and other ongoing costs the Wakelyns organic agroforestry requires a financial subsidy of between £25,000 and £40,000 per year. When my parents were alive, that loss was met from their personal funds (because they set up Wakelyns as a personal project), and from research grant money associated with some of the scientific work being done here (including from scientists working on site).

But, with my parents' deaths, those other sources of income have fallen away.

Wakelyns itself now needs to generate income from other activities on site to subsidise the organic agroforestry to maintain the jobs and public benefit which arises from its continuation.

#### Applying that to NPPF 80(a)

Returning then to how to all that fits within the applicable Development Plan policies and NPPF 80(a), as above: None of those policies explains assessment of the need for rural worker accommodation, let alone of the kind we have in mind here.

Council officers have noted Annex A of PPS7. It set out a rigid set of criteria which, historically, all had to be exhaustively met when it came to similar issues in the past. However, PPS7 has long been superseded by the NPPF guidance in Government's Housing Needs PPG. Notably, the PPG replaces the exhaustive, criterion-based approach from PPS7 with much more general guidance giving *examples of consideration that may be taken into account*:

“Considerations that it may be relevant to take into account when applying paragraph [80]a of the NPPF could include: evidence of the necessity for a rural worker to live at, or in close proximity to, their place of work to ensure the

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

Accordingly, none of those new considerations are set out as being a check list or set of requirements, let alone are then an exhaustive list of the ways of showing need for NPPF 80(a) purposes. That is a significant policy relaxation in approach from the position in the old PPS7 days of tightly drawn and exhaustive criteria, even when assessing a proposal for new permanent buildings (which is not the position here). The approach now to be taken is a notably flexible one.

#### Applying the policy considerations here

Turning then to consideration of such factors in the context of Wakelyns:

As above, to cover the financial losses of the Wakelyns organic agroforestry (and maintain the jobs involved), Wakelyns needs to make money from the rental of pods by people undertaking courses/events/activities at Wakelyns.

Most of those courses/events/activities will be dependent on the people involved in running enterprises to be based at Wakelyns. They will be providing courses (such as willow weaving, sourdough baking, natural dyeing) and/or providing food for the guests (whether in growing it, preparing it, cooking it or serving it, as the RealVeg CSA team and Wakelyns Bakery do).

Accordingly, without those planned on-site enterprises, Wakelyns will not be able to sustain the events and courses being attended by the people staying in the pods who, in turn, bring in the income needed to sustain the agroforestry.

Each of the enterprises will provide an opportunity for the people involved to establish and run their own business in a cost-effective way to make their own living from working in association with the farm/land/produce at Wakelyns. None of them would be doing that without these proposals.

Examples of what we offer (without charge) to the people/business already involved (albeit whose future depends on this planning application) include:

- Use of the bakery, use of the fridge unit, Wakelyns flour, harvesting of the fruit trees and teaching space, for Henrietta and Maisie in the Wakelyns Bakery;
- Use of organic growing alleys, water, use of storage units, use of the vegetable packing area and use of the fridge unit, for the RealVeg CSA growers;
- Forestry in the Wakelyns agroforestry tree lines, the use of workshop space, the use of storage space and access to teaching space and facilities, for Fay, the Woodland Haberdasher;
- Forestry in the Wakelyns willow and hazel coppicing areas, the use of workshop space, storage space and teaching space and facilities, for Emma & Adam, willow weavers; and
- Use of Wakelyns agroforestry ley alleys and tree lines, and the use of storage facilities for Tilly, who is about to set up a small-scale egg/chicken operation at Wakelyns.

None of them could afford directly to pay for those facilities. We are proud to be supporting the development of small rural businesses and employment in that way.

All the enterprises based here will need to be directly connected to the farming, food or environment of Wakelyns; the people involved will all be significantly involved in agriculture and/or forestry. We have, for example, turned away someone who makes yurts whose activities would not have had those characteristics.

The people who run those enterprises will in turn provide the teaching and other support for activities such as courses on site. They will also (instead of paying to be here and use the facilities) provide Wakelyns with some of their time. That, in turn, will help manage and run the overall infrastructure at Wakelyns, including doing things like providing the 24/7 on-site on-call cover for which neighbours have asked.

As discussed, Wakelyns expects (and indeed needs, for the overall proposal to succeed) to grow to between 6 and 12 such enterprises (depending on precisely on each of their needs in terms of land/buildings and what they can offer in terms of support for courses and events).

That will amount to an average of at least two people per enterprise (sometimes, but not always, a couple). To test that: while Fay, the Woodland Haberdasher (whose work involves forestry) is a solo, the others are multiple people (the bakery/fruit picking is two people, but they are already talking about needing at least one more part time to secure operational stability during the week/year; the RealVeg CSA growers are three people (including one couple); the forester/willow weavers are a couple; and so on).

Accordingly, the number of extra workers based at Wakelyns is likely to be about 10-20 overall, on top of the existing 5 people undertaking the existing organic agroforestry (who are paid, thus creating the need for subsidy income).

All of those people/enterprises will be integral to the only identified solution for securing the future of the organic agroforestry at Wakelyns. Wakelyns does not make money directly from them, but they enable the income generation (principally from the pods) which is required to sustain Wakelyns overall.

The need for up to 6 of them to be accommodated on site arises from a combination of factors: all of them are operationally involved in providing the 24/7 'duty cover'; most have direct operational needs associated with their activities on site which require them immediate and/or long-hours access/oversight (thus, for example, the bakers work 12+ hour days on their 'baking days' and so cannot be expected to travel, and the RealVeg CSA team need 24/7 to supervise and respond to, among other things, weather/wildlife etc issues (particularly in the context of their growing caterpillars and tunnels; and all of that is all year round in practice).

Most also anyway have no other financially viable business option let alone accommodation option (their income level and its variable profile means that they simply cannot afford to live locally in any other way). Aside from a couple of them who happen to have close family immediately nearby, none of those mentioned above has been able to find accommodation anywhere nearby at anything like a rate they could afford and/or in circumstances in which a landlord would take them on given their self-employed status and unpredictable incomes. Henrietta thought she had found local accommodation at a price which was affordable (because it was at a significantly reduced rate through a family friend), but that fell away when she realised she could not afford even that reduced rent. Wakelyns cannot, in practice, maintain/attract the required people/enterprises without the option of on-site accommodation.

### Overall

The officer recommendation for the grant of planning permission correctly recognises that the mobile homes in question are needed in the context of the proposed operations at Wakelyns.

Importantly, as above, that is not though a one-off evaluation (as would be the case if this were, say, an application for permission to build a house on a pig farm). Here, the position will be overseen by operation of conditions and/or section 106 agreements which recognise that – as above – the 'need' test is itself flexible and that the precise number/pattern of the enterprises will grow and may vary over time. Any uncertainty about the future of particular businesses, or the package of businesses overall, will be entirely covered by the operation of those conditions/agreements.

All of that is entirely consistent with NPPF paragraph 80 (etc) and the flexible approach now provided for in the PPG.

To summarise, 6 units of accommodation are needed by reference to the operational requirements of the proposed enterprises and Wakelyns overall, and/or the financial position of the enterprises involved. Those enterprises (and indeed other enterprises not calling for such accommodation) are a necessary overall to sustain the organic

agroforestry at Wakelyns. That need could not be met by reliance on 'permitted development' rights (for caravans for seasonal workers/foresters) because the people involved here are not simply seasonal; and, in any event, the finances (for them individually and overall) are not such as to make such an approach viable (nor would it provide the 24/7 on-site duty cover which has been asked for).

To regulate that (and inherent to answering the need question here), we suggest provisions which require that at least one person occupying each mobile home will be engaged full or part time in the agriculture, forestry, craft, baking/food preparation and/or educational/training activities arising from the organic agroforestry undertaken on site in circumstances where they need (for operational and/financial reasons arising from that activity) to live on site; and that any mobile homes not used or required for such a use for a period of 12 months will be removed from the site and the land on which they were situated will be remediated.

To put that in the context of the non-exhaustive list of considerations which the PPG says may be relevant: those workers are needing to live at or near their work for operational and/or financial reasons relating to their respective activities; considerations around the viability of those businesses are dealt with by the termination provision; it has not been suggested that we could/should turn existing farm buildings into accommodation on this scale; these are, in part, 'new enterprises', but if any were to fall away, we would need to replace them in the context of the overall site requirements, as above, and if that were not the case in overall terms, then the termination provision would bite.

David Wolfe

23 September 2021