

Pre-application advice for a temporary agricultural workers' dwelling (for a period of five years) and associated agricultural pack shed for a market garden at Woolstone Farm, EX23 0NB.

# Cover Letter

WMG.PA.02

Amber Blundell & Perry Burns

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07 APRIL 2024

Dear Madam/Sir,

Please find enclosed a request for Pre-application advice for a temporary agricultural workers' dwelling (for a period of five years) and associated agricultural pack shed for a market garden at Woolstone Farm, near Bude.

Included with this pre-application are the following supporting documents:

- WMG.PA.01 - Pre-Application Advice Form
- WMG.PA.02 - Cover Letter (this document)
- WMG.PA.03 - Site Boundary (indicative map)
- WMG.PA.04 - Elevations for Temporary Agricultural Workers' Dwelling (approx. 1:75)
- WMG.PA.05 - Elevations for Temporary Agricultural Workers' Dwelling (approx. 1:75)
- WMG.PA.06 - Elevations for Agricultural Pack Shed (approx. 1:600)
- WMG.PA.07 - Elevations for Agricultural Pack Shed (approx. 1:150)
- WMG.PA.08 - Flood Risk Assessment Data
- WMG.PA.09 - Woolston Market Garden Business Plan

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## Woolston Market Garden

### Our Purpose and Aims

Woolston Market Garden will focus on producing a range of vegetables, herbs and soft fruit using agroecological methods to supply weekly veg bags, retail and wholesale in Bude, North Cornwall, and the surrounding area.

There is a growing awareness and need for food to be produced at a local scale; domestic supply reduces reliance on volatile global supply chains, helps build resilience within local communities and the food system, and promotes sustainable land-use. The past year has seen shortages of salad on supermarket shelves, with the resulting furore highlighting the UK's vulnerability to political and climate induced food insecurity.<sup>1</sup> Additionally, poor practices of industrial agriculture are contributing to the decline in both soil and inland freshwater quality, whilst the transport and storage of fresh produce is a significant contributor to the greenhouse gas (GHG) emissions produced by the UK agriculture. This, coupled with the need to match growth in consumption of fruit and vegetables by 30% by 2032 to improve human health, demonstrates a clear need for better access to locally produced fruit and vegetables that are accessible to all.<sup>2</sup>

Woolston Market Garden aims to address the above challenges in the following ways:

- **AGROECOLOGICAL PRACTICES** – to promote biodiversity on site and improved soil health; methods will include min-till beds and agroforestry.
- **SEASONAL PRODUCE** – growing vegetables, herbs and fruit that are seasonal and appropriate to the climate.
- **COMMUNITY SUPPORTED AGRICULTURE (CSA)** – establishing a CSA veg bag scheme, with tiered pricing facilitating a solidarity scheme that makes it accessible to as many as possible.
- **LOCAL SUPPLY** – selling produce to retailers and restaurants within a 25-mile radius of the market garden.
- **SELF-SUFFICIENCY** – using renewable energy and rainwater capture to reduce reliance on external sources.
- **SHARING SUCCESS** – initiating a '1% for Bude' policy, whereby 1% of our annual profits are donated to an environmental or social organisation operating within our supply area.

Our research and combined experience have solidified our aims of demonstrating the importance of small-scale food production using agroecological practices and permaculture principles to deliver a wide range of socio-economic and environmental benefits.

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<sup>1</sup> The Fruit and Vegetable Alliance (2023) *Cultivating Success: Priorities for increasing sustainable production to meet growing demand*, <<https://foodfoundation.org.uk/sites/default/files/2023-05/Cultivating-Success-Final-March-2023-2.pdf>> (Accessed 20 October 2023).

<sup>2</sup> Defra (2022) Government food strategy, <<https://www.gov.uk/government/publications/government-food-strategy/government-food-strategy>> (Accessed 20 October 2023).

## Agroecology Definition

*Agroecology is an approach to food systems that produces high yields whilst enriching, rather than depleting, ecosystems. The UN Food and Agriculture Organisation (FAO) describes agroecology as “the basis for evolving food systems that are equally strong in environmental, economic, social and agronomic dimensions... Agroecology is based on applying ecological concepts and principles to optimize interactions between plants, animals, humans and the environment while taking into consideration the social aspects that need to be addressed for a sustainable and fair food system. By building synergies, agroecology can support food production and food security and nutrition while restoring the ecosystem services and biodiversity that are essential for sustainable agriculture.”<sup>3</sup>*



Figure 1: Looking west from the southern boundary of the site (September 2023).

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<sup>3</sup> Fernandes, J., Saltmarsh, E. and Miller, K. (2019) *Agroecology in Action*, <[https://landworkersalliance.org.uk/wp-content/uploads/2018/10/Agroecology\\_in\\_action.pdf](https://landworkersalliance.org.uk/wp-content/uploads/2018/10/Agroecology_in_action.pdf)> (Accessed 5 March 2024).

## Location

### Description

The site where we hope to establish Woolston Market Garden (50.789537, -4.519437) is approximately 6 acres, encompassing a 2-acre market garden, fruit and nut orchard, forest garden, operations area and living space for the owners/growers. It will be partitioned from a field approximately 15 acres in size using deer and stock fencing.

Located within the parish of Poundstock, the site is 2.7 miles south of Marhamchurch, and 3.1 miles east of Widemouth Bay. The site is adjacent to agricultural land, both pastoral and arable, and in close proximity to several residential dwellings and holiday lettings. It is bordered to the south by the main road leading off the A39 from Box's Shop to Titson, and to the east by a private road that leads up to the properties on Woolstone Manor Farm.

Hedgerows and trees line the south, east and north boundaries of the site. The site is currently part of a c.15-acre pastoral field used for low-input cattle and sheep grazing. The field is south facing, with a sloping aspect of changing gradient.

To the south of the site is a leet that runs into the River Neet. The lower portion of the of the site is in flood zone 3 (see WMG.PA.08). To clarify, there is no intention for structural development in the area deemed to be within flood zone 3. To the best of our knowledge the site is not subject to any relevant designations.

### Access

Existing access to the site is via an agricultural track that runs along the northern boundary of the field from a farm gate off the main road. This is currently used by the landowner and tenant farmer for agricultural purposes.

We do not intend to create a farm-gate point of sale for the produce we sell. This is partly due to the limited opportunities for parking around the site and wanting to avoid increasing traffic to the area. It is also a conscious decision, so that we may direct customers to instead visit retailers who stock our produce, thereby encouraging spending with local businesses in surrounding towns and villages.

### Ecology

Whilst no ecological survey has been conducted in preparation for this pre-application, it is our intention to record and monitor the ecology and biodiversity of the site under our stewardship.

Compared to conventional farming practices, organic and agroecological market gardens offer substantial environmental benefits by focusing on building soil health, carefully managing

resources, abstaining from harmful artificial inputs, and using cultivation methods that actively contribute to preserving and improving biodiversity.<sup>4</sup>

With reference to Defra's MAGIC map of priority habitats and species, the site has been identified as Network Enhancement Zone 2, which is described as 'land within close proximity to the existing habitat components that are unlikely to be suitable for habitat re-creation but where other types of habitat may be created or land management may be enhanced including delivery of suitable Green Infrastructure'.<sup>5</sup>

### Existing Use

The site is currently used for agricultural purposes to graze cattle and sheep. The land is owned by Alex Bluett, and will be rented for a minimum period of three years as a common agricultural lease with a view to purchase in next 3-5 years.

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<sup>4</sup> Laughton, R. (2024) *Horticulture Across Four Nations*, <<https://landworkersalliance.org.uk/wp-content/uploads/2018/10/LWA-Horticulture-Across-Four-Nations-2023.pdf>> (Accessed 24 February 2024).

<sup>5</sup> Natural England (2020) *Habitat Networks (Individual Habitats)*, <<https://naturalengland-defra.opendata.arcgis.com/maps/7d16507932cd436d824a1262e7c29594>> (Accessed 24 February 2024).

## Policy Context

### Local Plans

There is a clear and pressing need for Cornwall's agricultural sector to adopt sustainable, nature-based approaches to its farming practices and land management to mitigate and provide resilience against the wide-ranging impacts of a changing climate. The continued loss of biodiversity, habitat degradation, depletion of soil resources, and changes to consumer demand and attitudes are also key drivers for sector adaptation and diversification. This need has been acknowledged in a suite of Cornwall Council policy and strategy documents (see Table 1), which demonstrates considerable support for our proposal.

### National Policy

Paragraph 84 of the recently updated *National Policy Planning Framework* (NPPF) states that the development of 'isolated homes in the countryside' may be permitted if '*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*'.<sup>6</sup>

Less explicitly, support for our proposal can also be seen in paragraph 83 of the NPPF, which states: '*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.*'<sup>7</sup>

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<sup>6</sup> Department for Levelling Up, Housing & Communities (2023) *National Planning Policy Framework*, <[https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf)> (Accessed 5 March 2024).

<sup>7</sup> Ibid.



**Table 1: Relevant Local Strategies and Planning Policies**

<b>DOCUMENT</b>	<b>AIM OR POLICY</b>	<b>HOW IT RELATES TO OUR PROPOSAL</b>
<a href="#">Cornwall Local Plan: Strategic Policies 2010-2030</a>	1 – Presumption in favour of sustainable development	Calls for sustainable development, considered against its three pillars: economic and social development and environmental protection and improvement.
	2 – Spatial Strategy	Respecting and enhancing the quality of place; assisting the creation of resilient and cohesive communities; generating and sustaining economic activity (supporting food industry).
	2a – Key targets	Providing homes that can best meet the need and sustain the role and function of local communities.
	7.5 – Housing in the countryside	Supports dwellings in open countryside locations as an exception of full time agricultural and forestry and other rural occupation worker where there is up to date evidence of an essential need of the business for the occupier to live in that specific location.
	12 – Design	Consideration of fundamental design principles (character, layout, movement, adaptability, inclusiveness, resilience and diversity, and engagement process) whilst respecting neighbouring dwellings.
	13 – Development standards	Meeting standards whilst avoiding adverse impacts.
	21 – Best use of land and existing buildings	Encourages sustainably located proposals that consider the benefits (including food production) of agricultural land.
	23 – Environment	Protecting and enhancing Cornwall’s natural environment; conserving, protecting and enhancing biodiversity and geodiversity interests and soils.
	26 – Flood risk management and coastal change	Minimising or reducing flood risk on site (using natural flood management techniques, i.e. woodland and pond creation).
	27 – Transport and accessibility	Safe and suitable access to the site must be in the plan.
<a href="#">Climate Emergency Development Plan Document</a>	C1 – Climate Change Principals	Encouraging regenerative land management practices for the sustainable production of food.
	AL1 – Regenerative, Low Impact Development	Permitting low-impact development that supporting livelihoods that make a positive environmental and social contribution to Cornwall.
<a href="#">Future Cornwall</a>	Theme 4: Objective 9 – To make the most of our environment	Supporting local food production and increasing resilience to climate change.

	Theme 4: Objective 10 – Enhance and reinforce local natural landscape, historic character and distinctiveness and raise the quality of development	Maintaining and enhancing an effective network of open space and environmental stewardship for Cornwall’s ecosystems services network for food production, flood control and wildlife.
<a href="#">Bude-Stratton Neighbourhood Development Plan: 2016-2023</a>	Aim 4 – Housing	Chiefly 4.2.7, which calls for Bude-Stratton become more self-sufficient in terms of food production, and 4.2.6, which encourages the provision of land for self-builds.
	Aim 4: Policy 8 – Food Growing	Lends support to residential development that will provide innovative space for food growing.
<a href="#">The Cornwall Plan 2020-2050: Together We Can</a>	Aim 2: Sustainable food, land and seas	Vision for profitable farming, food processing and land management, achieved through improved productivity, promotion of sustainable local produce and diversification.
<a href="#">Cornwall and Isles of Scilly Environmental Growth Strategy 2020-2065</a>	Natural Climate Solutions and Adaptations	Will support use of new land management approaches to develop climate solutions that work with natural processes, create natural on-land carbon sequestration and adaptation landscapes (including plants and soils).
	Sustainable Food	Will promote local producers (including small-scale); champion pollinator-friendly practices; champion food & seed security; and encourage regenerative, low input and organic local production, good soil-management, and agroforestry.
	Economic & Social Wellbeing	Will encourage businesses, communities and individuals to work together to increase environmental, social and economic prosperity.

## Site Proposal

Our proposal is for a temporary agricultural workers' dwelling (for a period of five years) and associated agricultural pack shed (with solar PV array) for a market garden.

### Development

The proposed development encompasses infrastructure to support the running of a market garden business, including an agricultural pack shed, and a modest agriculturally tied dwelling for the business owners to occupy year-round. Development will be largely confined to the lower third of the site, where the market garden will operate, as illustrated on the site plan (WMG.PA.03). This area has a gentle gradient, sheltered from the prevailing winds by an established tree line bordering the road, which would also ensure the least visible impact of the development within the broader landscape. The upper two thirds of the site would be managed as an orchard and a food forest. We propose that the temporary dwelling be sited at the very top of the site, though would also consider it being located within the market garden area if that would be more favourable to consent.

The development will comprise the following elements:

- **Temporary dwelling for agricultural workers**  
Our proposed design (WMG.PA.04 and WMG.PA.05) complies with the definition of a dwelling without foundations given in the Caravan Sites and Control of Development Act 1960: '*any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer)*'.<sup>8</sup> We intend to use local materials where possible to construct and clad the caravan, and install a turf roof to further compliment the surrounding area (whilst helping to insulate the structure). Footprint: 10m x 3m (30m<sup>2</sup>).
- **Agricultural pack shed with solar PV array**  
Our proposed design (WMG.PA.06 and WMG.PA.07) is for a timber framed pack shed with a footprint of 10m x 10m, which will be used to process and store produce harvested from the site. The solar PV array installed on the roof of the pack shed will provide energy for the business and the agricultural dwelling. Footprint: 10m x 10m (100m<sup>2</sup>).
- **Polytunnels**  
Indoor growing space is required to enable us to grow the broadest range of crops throughout the season. Based on the number of CSA members and wholesale customers we hope to grow for, we envisage needing four polytunnels (approx. 6.4m x 24m) and a smaller propagation polytunnel to fulfil our needs. These will be erected of

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<sup>8</sup> Caravan Sites and Control of Development Act 1960, <<https://www.legislation.gov.uk/ukpga/Eliz2/8-9/62>> (Accessed 5 March 2024).

the course of several years as our growing space evolves to meet demand. Total footprint for four polytunnels: 30m x 25m (750m<sup>2</sup>).

These developments will be supported by the following elements:

- **Hardstanding paths**

To enable access to the market garden, we will require a hardstanding path leading from the existing agricultural track along the north boundary down to the lower portion of the site. This will enable vehicle access to the pack shed and for the distribution of materials (compost, woodchip, etc.) around the site.

- **Rainwater harvesting**

We envisage installing rainwater harvesting tanks to the pack shed, and smaller ones to the dwelling.

- **Composting toilet**

This will be used to minimise wastage and the need for infrastructure on the site. Composting toilets are sustainable alternatives to flushing toilets, and are commonplace on such sites as our proposal. This would be timber-clad and planted around to be as discrete as possible.

- **Waste water treatment**

Grey water produced by the dwelling will be managed via a reed bed and soakaway system.

## Essential Need

Policy 7 of the Cornwall Local Plan states that new dwellings in the open countryside will be permitted under special circumstances, restricted to:

*4 Temporary accommodation for workers (including seasonal migrant workers), to support established and viable rural businesses where there is an essential need for a presence on the holding, but no other suitable accommodation is available and it would be of a construction suitable for its purpose and duration; or*

*5 Full time agricultural and forestry and other rural occupation workers where there is up to date evidence of an essential need of the business for the occupier to live in that specific location.*

From our business plan (WMG.PA.09), it is clear we intend for the business established at the site to be financially viable within the first few years of operating. This viability, however, relies on us as owners and growers having a low-cost, low-impact lifestyle. The cost of renting or purchasing a property locally, when we intend to invest heavily into the establishment and running of the business, would detract from the viability of the business. We strongly believe that our intentions for the site are in the best interest of the community, and by living on site we will be best placed to ensure the aims of the business (as outlined on page 3) are achieved.

Growing at a human scale, using agroecological practices, is labour intensive and often requires long days that are often determined by the weather and other external factors. We propose that there is a demonstrable essential need for us as full-time agricultural workers to live on site to ensure effective management of such tasks as:

- Polytunnel ventilation – fluctuations in temperature, sunshine and wind require rapid responses to the change in airflow permitted.
- Irrigation – done by hand or through a sprinkler system, both of which will be closely managed to ensure the most effective use of water resources.
- Pest control – on site presence will enable us to mitigate damage to crops from pests and other wildlife, which could otherwise significantly impact production.
- Frost protection – the risk of which could damage crops, and therefore requires close attention and quick response time for covering, harvesting and storing.
- Security – of crops, infrastructure, and equipment (hand tools etc.).

Given that the working days are often long and operate during unsociable hours, being situated on site would help minimise traffic (and subsequent disturbance) caused by journeying to and from the site, potentially multiple times a day.

We acknowledge that automation would forgo the need for us to be located on site for management of the aforementioned tasks. However, it is our intention to practice low-impact land management that works closely with natural systems, does not apply harmful chemicals, minimises soil disturbance, and manages resources effectively. Sustainable small-scale farms – such as the one we are proposing – are essential for creating a more diverse and resilient food system, and operate in accordance with low-impact, environmentally friendly principles that are essential to help achieve climate and biodiversity targets. This is clearly supported by policies in Cornwall’s Climate Emergency Development Plan Document:

*‘Development in Cornwall should represent sustainable development and manage our natural, historic and cultural assets wisely for future generations, contributing in line with the scale and type of development to achieving the following objectives [including]:*

*Use and reuse land efficiently and minimise impact of development on soils through over compaction, pollution or reduction in the quality of soil and encourage regenerative practice to conserve the capacity of soils for sustainable production of food, water, raw materials and energy’.<sup>9</sup>*

The economic potential of small-scale agroecological has recently been explored by the Landworkers’ Alliance, who argue that an increase of market gardens, ‘focussing on the local and regional supply of organic and agroecological fresh produce throughout the UK, could enable the UK to shift 20% of the £2.7 billion currently spent on vegetable imports, to domestic production, thereby keeping an additional £588 million circulating in local economies’.<sup>10</sup>

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<sup>9</sup> Cornwall Council (2023) Climate Emergency Development Plan Document, <<https://www.cornwall.gov.uk/media/uxgjk4jn/climate-emergency-dpd.pdf>> (Accessed 5 March 2024).

<sup>10</sup> Loughton, R. (2024) *Horticulture Across Four Nations: A report by the Landworkers’ Alliance*, <<https://landworkersalliance.org.uk/wp-content/uploads/2018/10/LWA-Horticulture-Across-Four-Nations-2023.pdf>> (Accessed 5 March 2024).

There is a clear and pressing need for more vegetables and fruit to be grown locally in the UK. However, as noted in a recent report, ‘due to financial pressures, lack of investment in research and development, climate related challenges and lack of skilled labour, there is a real risk that production will decline in the coming years.’<sup>11</sup> We believe that our proposal for a market garden at Woolstone Farm offers a credible solution for localised food production that will serve an essential need to our local community.

### Permanent Consent

Our intention is to purchase the land from the current owner in the next 3-5 years, at which point we will seek planning permission for a permanent dwelling on the site. The dwelling will still be to provide accommodation for the owners/growers and – as with the temporary dwelling – be of a modest size, thoughtfully designed and low-impact.

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<sup>11</sup> Fruit and Vegetable Alliance (2023) Cultivating Success: Priorities for increasing sustainable production to meet growing demand, <<https://landworkersalliance.org.uk/wp-content/uploads/2018/10/Cultivating-Success-Final-March-2023-2.pdf>> (Accessed 5 March 2024).

## Conclusion

We hope that this cover letter reassures the council of our commitment and determination to creating a site that will provide multiple social and environmental benefits for our community, and enable us as new entrants to farming to fulfil the aims of the business that we intend to establish there. The importance of working towards a healthy environment in which nature, people and communities can thrive is incredibly important to us. Food is inextricably linked to both environmental and social health, and we are passionate about contributing to a local, more resilient food system for Bude and the surrounding area.

We eagerly await your comments on our proposal, and look forward to responding to any queries that may arise.

Kindest regards,

Amber Blundell and Perry Burns