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Mr P Barnett
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Your ref: ADC/0184/10
ADC/0185/10
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Date: 31 August 2010

Dear Mr Barnett

Proposed farm workers' cottages at Erringham Farm, Shoreham by Sea, BN43 5FA
Planning application references ADC/0184/10 and ADC/0185/10

I support the above planning applications for two farm workers' cottages at Erringham Farm submitted by our member Mr Peter Nye.

I have read the associated documents relating to the applications and agree fully with the report and subsequent letters submitted by Mr M Berryman of Complete Land Management (CLM). I would disagree with the claim in the report by Reading Agricultural Consultants (RAC) that, because the ranch style of livestock management operated at Erringham Farm leads to less intervention by farm staff, then on-site accommodation is not required. Reduced intervention in lambing and calving is undoubtedly a beneficial outcome of this management regime, but it does not follow that there will be any reduction of the need for welfare, vigilance, application of medical treatments and general good animal husbandry. For the latter reasons I maintain that the functional test for the proposed housing is met. The agricultural dwelling occupied by Mrs Nye (senior) is not available, as her occupation of it meets the criteria of the Agricultural Occupancy Condition. I am aware of other cases where similarly occupied dwellings have been deemed unavailable for a new agricultural housing requirement.

I note from the CLM letter of 19 August that Mr Nye is negotiating to replace his existing ESA agreement with an Environmental Stewardship Higher Level Scheme (HLS) agreement in April 2011, which will secure the financial future of the farm but will also lead to a more intensive livestock operation. Both these aspects underpin the meeting of the financial and functional tests. With regard to the concerns of RAC about future funding of agri-environment schemes, I quote from a recent communication from Natural England:

The Rural Development Programme for England (RDPE), under which Higher Level Stewardship is funded (and most other areas that are not ring fenced) is being considered as part of the Comprehensive Spending Review. We are unlikely to know the outcome of that until October, when we should also have certainty about HLS budgets for the remainder of the RDPE period. ***Defra is clear that biodiversity should be afforded a high priority and that agri-environment schemes are "an integral part of the range of policy instruments available to maintain our natural heritage."*** (my emphasis).

Bearing in mind the proportion of EU money involved and the importance of Environmental Stewardship in delivering Water Framework Directive and other environmental objectives, we are confident that HLS funding will be maintained.

The approval of the two planning applications would put Erringham Farm on a sound footing to continue the development of its livestock enterprise. Cattle and sheep grazing is the preferred agricultural activity on the South Downs to maintain the traditional grass landscape, according to the current South Downs Joint Committee. No doubt a similar policy view will be taken by its successor, the emerging South Downs National Park Authority. I commend these applications to the Council and respectfully request that they are given favourable consideration.

Yours sincerely



John Archer
Regional Environment & Land Use Adviser