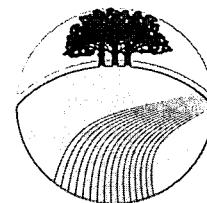


# Reading Agricultural Consultants



Our Ref: 6469/lp1

Your Ref: 12/00716/FULLN

6 November 2014

**For the attention of Mrs L Page**

Test Valley Borough Council  
Planning Department  
Beech Hurst  
Weyhill Road  
Andover  
Hants  
SP10 3AJ

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BUILDING SERVICE		
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Dear Mrs Page

**Site: Warrenfield Farm, Longstock Road, Goodworth Clatford**

**Application: 12/00716/FULLN**

**Proposal: Erection of a single storey two bedroom bungalow to provide agricultural worker's accommodation**

Thank you for your letter of instruction dated 27 September requesting our additional comments and observations on the above application.

Reading Agricultural Consultants Ltd (RAC) has commented twice before on this application. We concluded in our letter of 26 October 2012 that:

*"Mr and Mrs Scott failed to develop the enterprise as proposed.*

*The enterprise in operation at Warrenfield Farm is of such a scale and nature that there is no requirement for a worker to live on site to provide for the welfare needs of the farmed animals.*

*Furthermore, it is evident that the current activity generates such minimal income that it is not possible to conclude that the enterprise is either viable or sustainable in the long-term."*

Mr and Mrs Scott subsequently provided some further information, namely:

- a letter to a letter to Test Valley Borough Council (TVBC) dated 28 October 2012 which included an email sent to Councillors Stallard and Flood of the same date;
- a letter to TVBC dated 24 January 2013; and
- a letter to TVBC with attachment, dated 31 March 2013.

TVBC subsequently asked RAC on 18 April 2013 to comment on the justification for a temporary permission for a three-year period. RAC provided brief comments in an email of 24 April 2013 which advised that insufficient information had been provided to enable a re-assessment of this application.

The applicants have recently provided the following additional supporting information:

- a Business Plan prepared by Tom Tyrwhitt-Drake of BCM LLP dated June 2014;



- a document titled Enterprise and Justification for Warrenfield Farm prepared by Mrs Scott;
- the Warrenfield Farm accounts for the years ending 31 March 2013 and 2014; and
- a letter from Mr Scott to TVBC dated 23 October with attachments: an advert from Farmers Weekly; cattle data from CTS online (although the information is incomplete due to formatting issues); and cattle TB test data from the AHVLA dated 30 July 2013.

RAC also carried out an agricultural assessment of an earlier application (08/00739/FULLN) for the siting of a temporary mobile home to provide agricultural worker's accommodation and the installation of a sewage treatment plant. Our appraisal was dated 28 May 2008, and permission was granted on 18 June 2008.

The RAC appraisal concluded that:

*"It is clear that Mr and Mrs Scott are committed to developing a traditional, organic farm concentrating on traditional breeds and producing local foods for their surrounding areas. They are well informed, hard-working and capable of developing such an enterprise taking into account Mr Scott's educational and employment history.*

*It is difficult to accurately assess the specific labour requirements for an enterprise of this type but the combination of different species of breeding livestock, in addition to the horticultural and arable enterprises, creates a unique position and in my view this combination of enterprises, each with its own particular requirements through the year, could not be established without the ready availability of a key worker available at most times."*

Planning permission for the temporary dwelling expired on 18 June 2011.

In order to gain and clarify the additional information, I attended a site visit on 20 October when I met the applicants, Mr and Mrs Scott; viewed the livestock and buildings; and discussed the existing enterprise in operation. You and Councillor Flood were also present at this meeting.

The following paragraphs are numbered for ease of reference.

### **Background**

1. The background to the holding has been set out in full in the 2012 RAC assessment of this application and it shall not be repeated in full here.
2. Warrenfield Farm comprises some 10 ha (25 acres) of grassland and was purchased by Mr and Mrs Scott in 2001. Mr Scott has spent his working life on farms in Hampshire. It is understood that Mr Scott continues to work full-time at a local farm whilst providing additional labour at Warrenfield Farm to support Mrs Scott who works full-time on the holding.
3. The management of the land has changed in the years since the last application in 2008. Then, most of the land was in arable production, producing organic seed corn on contract, milling wheat, malting barley and a range of horticultural crops. Now, organic certification has lapsed and the arable land has been re-seeded to grass.
4. The buildings remain as listed in the 2012 RAC assessment; a pole barn, machinery and grain store, a greenhouse, a general storage building, a livestock building and the mobile home.
5. The livestock enterprise is now the main agricultural activity in operation on the holding and current stock numbers comprise:
  - 6 Hereford cows with 5 calves, 2 heifers and 1 aged cow (no longer calving);
  - 1 Hereford bull (sold and awaiting collection);
  - 18 ewes (mainly Hampshire Downs), 5 shearling ewes; 9 wethers and 1 ram;
  - 50 laying hens;

- 16 meat chickens; and
  - 120 white turkeys (day-old hen chicks were purchased in June 2014).
6. Mr and Mrs Scott also grow onions, garlic, tomatoes (in the greenhouse), marrows, courgettes, beans, blackcurrants and raspberries. Surplus produce is made into jams and chutneys by Mrs Scott.
  7. The Business Plan sets out future development plans for the enterprise and states that the livestock numbers will increase in 2016 to:
    - 20 cows, 30 ewes, 200 turkeys, 50 laying hens and 160 table birds.
  8. The sheep numbers are due to increase in 2015 to 23 ewes to lamb and it is anticipated that the turkey enterprise will eventually increase to 200 birds reared each year.
  9. All produce is sold through Andover market (monthly March to December), Stockbridge market (each Thursday morning), a local shop in Goodworth Clatford, the country market in Hartley Wintney and from the farmgate at Warrenfield Farm.
  10. There are no pigs on the holding at the present time although Mrs Scott did advise that two gilts have been purchased and will either be reared for the Christmas market or will be used for breeding.
  11. Since the 2012 site visit, the livestock enterprise has developed to incorporate the rearing of meat chickens; about 20 day-old chicks are purchased every two months. The chicks are kept under heat until they are feathered at about 4-6 weeks of age and are kept on the holding for about 12-14 weeks, when they are slaughtered and sold as oven-ready birds.
  12. Mrs Scott advised that laying hen numbers are kept below 50 to ensure that they do not need to register the flock. The birds are not culled and therefore the flock is made up of birds of varying ages. Within the last month a batch of 20 point of lay hens was purchased. The birds are currently laying about 35 eggs per day.
  13. The proposal in this application is to provide a permanent agricultural worker's dwelling (142m<sup>2</sup>) which incorporates two bedrooms and an office, to support the existing enterprise at Warrenfield Farm.

### **Relevant Planning Policy**

14. The National Planning Policy Framework (NPPF) came into effect on 27 March 2012. Paragraph 28 states:
 

*"planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:*

*support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;*

*promote the development and diversification of agricultural and other land-based rural businesses;"*
15. In respect of new housing in the countryside, paragraph 55 advises:
 

*"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities....Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as:*

*the essential need for a rural worker to live permanently at or near their place of work in the countryside..."*

16. Paragraph 214 of the NPPF then states that

*"For 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with this Framework."*

17. Policy ESN 07 of the Test Valley Borough Local Plan (adopted 2 June 2006) is concerned with Agricultural Workers' Dwellings and states that:

*"In the countryside, a new agricultural or forestry workers' dwelling, or the change of use of a non residential building to an agricultural or forestry workers' dwelling will be permitted provided that:*

- a) the dwelling is essential to agriculture or forestry operation (in relation to the needs of the particular unit or operation, rather than the owner or occupier);*
- b) an existing dwelling, either in or closely connected to the unit, previously housing a worker employed on the unit, has not been sold separately from the unit or in some other way alienated from it within the past five years;*
- c) a building either on or closely connected with the unit which would have been suitable for conversion to an agricultural dwelling has not been sold separately from the unit or in some other way alienated from it within the past year;*
- d) the occupancy of the new dwelling (and other dwellings related to agriculture already on the unit) is restricted to workers solely or mainly working or last working in the locality in agriculture or in forestry, or widows or widowers of such persons and any resident dependants; and*
- e) the design, size and location of the dwelling should be such as to limit its impact on the landscape and conservation interests in the countryside."*

18. Supporting paragraph 6.4.44 states:

*"For most farm or forestry workers it will usually be as convenient, and perhaps socially more desirable, for them to live in nearby towns and villages, as it will be for them to live where they work. However, where it is essential for a worker to be accommodated on a farm or forestry unit for example to care properly for livestock or for management reasons a new dwelling or the conversion of an existing non-residential building in the countryside may be justified. In considering whether a dwelling is essential, the Council will apply functional and financial tests and particular consideration will be given to the following factors:*

- whether the stated intentions to engage in farming or forestry are genuine, are reasonably likely to materialise and are capable of being sustained for a reasonable length of time;*
- the need for the worker to be accommodated on the unit itself;*
- the labour requirements of the unit; and*
- whether there is existing accommodation available on the unit or nearby and reasons why it does not meet the needs of the worker to be accommodated on the unit."*

19. Paragraph 6.4.45 provides further guidance in stating:

*"The purpose of these tests is to establish whether there is a genuinely essential need for a new dwelling. The needs of the unit will be considered rather than needs of an owner since the latter may change rapidly if personal circumstances alter but the former are likely to be longer term."*

## Appraisal

### Essential Need

20. In order to demonstrate that there is an essential need for a worker to live on site, it is reasonable to consider whether it is essential for the proper functioning of the enterprise for one or more workers to be readily available at most times. Such a requirement might arise, for example, if workers are needed to be on hand day and night:
- in case animals or agricultural processes require essential care at short notice;
  - to deal quickly with emergencies that could otherwise cause serious loss of crops or products, for example, by frost damage or the failure of automatic systems.
21. It was accepted at the time of the 2008 application that there would be a need to live on site to support the enterprise – this need was based on the existing organic arable enterprise and the proposed livestock enterprise. The main functional needs of the holding related to the different species of breeding livestock and the horticultural and arable enterprises, most importantly:
- five cows which were to be multiple suckled each with three calves;
  - 20 spring lambing ewes;
  - 3 sows each producing two litters per year;
  - 300 laying hens; and
  - 100 turkeys which were to be purchased as day-olds and reared through to finished weights.
22. It is evident that whilst there has been some increase in the livestock numbers since the RAC appraisal in 2012, the increase has not developed to the extent proposed in 2008 which gave rise to the essential need to live on site. It is also noted that, whilst there are plans to develop this enterprise further, these have no bearing on the consideration for a permanent dwelling as the essential need must be existing rather than proposed.
23. It was stated in the 2012 RAC assessment that:

*“The stock numbers have never reached the levels proposed and it is noted:*

- *whilst the cow numbers are now at the proposed level, these cows are not multiple-suckled and the functional needs of these animals are therefore less than previously estimated;*
- *the sows have not been purchased and there is therefore no need to be on site to provide essential supervision during farrowing – the welfare needs of the two male store pigs currently on site are minimal;*
- *the welfare requirements of the turkeys related mainly to the introduction of the birds as day-olds which were then to be reared under heat for 6-8 weeks. This is clearly not the management system currently in place as the turkeys are purchased as poults at six weeks of age, once off heat. There is a reduced welfare need to support these birds; and*
- *the laying hen numbers have never developed to the levels proposed.”*

*In addition, the enterprise is no longer operated under organic management systems, with the increased labour requirements associated with that type of management, and the arable enterprise no longer exists. Furthermore, the horticultural enterprise has been scaled down from that previously proposed.”*

24. There has been some increase in livestock levels since the 2012 application, however the cows are not multiple suckled, there are currently no pigs and the hen numbers have never developed to the levels previously proposed. Whilst it is appreciated that the turkeys are now (in 2014) purchased as day olds and there is a small meat chicken enterprise in operation, these increases are not of sufficient scale to alter the conclusions reached previously.
25. The anticipated functional needs have not materialised over the last six years and the current numbers do not give rise to an essential need to live on site.

#### *Labour*

26. This view is further supported when the labour requirements of the current enterprise are assessed.
27. The labour of an enterprise can be estimated using the standard data as found in the 2014 John Nix Farm Management Pocketbook.
28. Mrs Scott has provided an assessment of 'Standard Man Days' in her supporting document based on this standard data (which includes a 30% uplift for a small scale enterprise), which indicates the following:

	Number/hectare	SMD/head/annum	Total SMDS
Cows	9	3.4	30
Bulls	2	5	10
Sheep	28	0.7	20
Rams	1	0.7	1
Store lambs	12	1.2	15
Hens	50	0.08	4
Broilers	120	0.08	10
Turkeys	125	0.08	10
Potatoes/vegetables	0.5		46
Hay/grazing	9	2.86	26
Poultry prep			35
Maintenance (20%)			42
<b>Total SMDs</b>			<b>249</b>

29. Unfortunately there are a number of errors in the calculations and the following table is RAC's assessment of the current enterprise (using the livestock figures provided by the applicants which form the basis of this assessment):

	Number/hectare	SMD/head/annum	Total SMDS
Cows	6	1.35	8.1
Heifers and aged	3	1.6	4.8

cow			
Bulls	1	5	5
Ewes	18	0.5	9
Rams	1	0.5	0.5
Store lambs	14	0.3	4.2
Hens	50	0.06	3
Broilers	20 <sup>1</sup>	0.06	1.2
Turkeys	125	0.06	7.5
Potatoes/vegetables	0.5		46
Hay/grazing	9	1.1	9.9
Sub total			99.2
Maintenance (15%) <sup>2</sup>			15
<b>Total SMDs</b>			<b>114.2</b>

<sup>1</sup>broiler places not bird produced each year

<sup>2</sup>standard to include 15% maintenance

30. The labour requirements for the holding (excluding any processing and marketing which do not give rise to an essential need to live on site) are just over 40% of a full-time worker. Whilst I appreciate that there is scope to increase this figure by 30% to reflect the small-scale nature of the enterprise (although not for the potato and vegetable production figure which relates to small scale enterprises in any event) to 135 SMDs, this would still only represent about 50% of a full-time worker. These figures demonstrate that the enterprise has not reached a level which generates an essential need to live on site for a full time worker.

#### Financial Viability

31. In order to assess the viability and sustainability of an enterprise it is usual to consider three full year's financial accounts; to assess a shorter period will not give a full overview of the business. From the information available, it would appear that no accounts have been prepared for Warrenfield Farm prior to the year ended 31 March 2013 and therefore only two years' accounts are available for this assessment.
32. The accounts information submitted shows a substantial increase in sales from £10,502 in 2013 to £31,359 in 2014; the majority of this increase relates to increased 'shop sales' from £96 in 2013 to £18,039 2014. It is difficult to reconcile such a substantial increase in sales/turnover when there has been no comparable increase in livestock numbers and additional information would be required to substantiate these figures.
33. However, even if this substantial increase in sales/turnover is accepted, it is evident that the current profit levels of under £11,000 are insufficient to cover all labour costs and the construction costs associated with the permanent dwelling.
34. Based on the above, it is not possible to conclude that the existing enterprise is financially viable and sustainable in the long-term.

#### **Conclusion**

35. The applicants have now had six years, the equivalent to two three-year permissions, living on site to develop this enterprise to the levels as set out in 2008 and yet, for whatever reasons, have failed to do so.

36. I remain firmly of the opinion that the enterprise in operation at Warrenfield Farm is of such a scale and nature that there is no essential need for a worker to live permanently on site to provide for the welfare needs of the farmed animals. This conclusion is supported by the labour assessment which indicates that, at current levels, there is a need for just over 50% of a full time worker.
37. From the information available, it is evident that no formal accounts were prepared for the enterprise prior to the year ended 31 March 2013. This is a weakness in the current application which seeks planning permission for a permanent dwelling. It is not possible to conclude from the financial information available that the enterprise is viable and sustainable in the long term.
38. Sales figures have increased in 2014, although the basis for this increase is not clear. In any event it is evident that the enterprise does not generate sufficient profits to cover labour and construction costs.

I trust these comments and observations are useful.

Yours sincerely



Jill Scrivener