IAN PICK ASSOCIATES LTD.
SPECIALIST AGRICULTURAL AND RURAL PLANNING CONSULTANTS

AGRICULTURAL APPRAISAL & PLANNING STATEMENT

PROPOSED TEMPORARY AGRICULTURAL WORKERS
DWELLING AT
40 ACRE SITE
GUANOCKGATE ROAD
SUTTON ST EDMUND

C S GENT AND SONS

APRIL 2014

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1. INTRODUCTION

1.1 This report has been commissioned by C S Gent of Ashlea Farm, Guanockgate Road, Sutton St Edmund, Spalding, PE12 0LU in connection with a planning application for the siting of a temporary agricultural workers dwelling in connection with a free range egg laying enterprise.

1.2 The purpose of this report is to provide an objective appraisal of the agricultural business operated by the applicants. This report has been prepared having regard to Paragraph 55 of the National Planning Policy Framework which outlines the criterion for agricultural workers dwellings.

1.3 This report has been prepared by Ian Pick. Ian Pick is a specialist agricultural and rural planning consultant. He holds a Bachelor of Science with Honours Degree in Rural Enterprise and Land Management and is a Professional Member of the Royal Institution of Chartered Surveyors, being qualified in the Rural Practice Division of the Institution.

1.4 Ian Pick has 15 years experience in rural planning whilst employed by MAFF, ADAS, Acorus and most recently Ian Pick Associates Limited.

2. BACKGROUND

2.1 The applicant operates an agricultural business from Ashlea Farm which is based on arable and poultry farming enterprises. The farm extends to 850 acres of owner occupied land, together with 1450 acres farmed on rental and contract farming arrangements. The arable operations include wheat, oilseed rape, beans, linseed and oats.

2.2 The free range egg production enterprise extends to 64000 laying hens, in four specialist poultry units. The free range enterprise includes two units at Ashlea Farm, Guanockgate Road, Sutton St Edmund; and two units at 40 Acre Site, Guanockgate Road, Sutton St Edmund.

3. AGRICULTURAL BUSINESS DESCRIPTION

3.1 The proposed development is for the siting of a temporary agricultural workers dwelling at 40 Acre Site, Guanockgate Road, Sutton St Edmund. The site is located approximately 1 to the north of Ashlea Farm. The proposed mobile home is intended for the specific occupation by a stockman associated with the free range egg laying units at 40 Acre Site.

Free range egg laying Enterprise

3.2 The free range egg laying enterprise comprises a two purpose building poultry unit which house a total of 40000 laying hens, together with associated egg collection and packing facilities.

3.3 The free range egg laying units operate with automated feeding, lighting and ventilation systems. Water supply is provided by non-drip nipple drinkers.

3.4 The lighting within the buildings is on a timeswitch, providing the birds with 15 hours of daylight per day. The lights within the building come on at 7.00am and go off at 10.00pm. Lighting control within the building is critically important as any failure can affect the laying cycle.

3.5 Ventilation within the buildings is automatic thermostat controlled. The system comprises roof fans and side inlet vents. The thermostatic controlled system opens and closes vent and operates the ridge fans to maintain a constant temperature within the building. The building is alarmed for high and low temperature and power failure.

3.6 The inside of the building includes a scratch area, raised dunging area and nest boxes.

3.7 The floor of the nest boxes are spring loaded and angled towards the conveyor. Once the hens lay their eggs in the nest boxes and leave, the floor of the nest springs upwards and the egg then rolls onto the conveyor.

3.8 The conveyor brings the eggs to the packing area which is situated at the end of the building. Following packing, the eggs are placed on trolleys within the refrigerated egg store and are collected two to three times a week.

3.10 Pop holes are situated in the sides of the building. These pop holes provide the birds with direct access to the range area. Pop holes are opened at 8.00am daily and closed at 9.00pm (or dusk).

3.11 The unit operates on a 56 week cycle. Birds are purchased at 'Point of Lay' aged 16 weeks and housed within the specialist free range poultry unit on the holding. The birds are kept within the laying flock for 56 weeks and are then sold and replacements purchased.

Labour

3.13 Labour for the business is provided by a full time stockman, together with part time egg collection staff.

3.14 The standard labour requirement for the farming business is shown in the table below.

Enterprise	Standard Man Days per Head or Hectare	Total Enterprise Labour Requirement in SMD
Free Range Egg Unit (40000 birds)	0.06	2400
Total		**2400**

3.15 The above table shows a standard labour requirement for the business of 2400 standard man days which equates to 8 full time workers, based on 300 SMD

per full time worker. The unit has a high degree of automation and thus labour is employed at less than the standard man day calculation.

Dwellings

3.16 There are no existing dwellings at the 40 Acre Site. It is proposed to site a mobile home to be occupied by a full time poultry manager. The applicants control the farmhouse at Ashlea Farm which is approximately 1 mile from the application site. The farmhouse occupied in connection with the supervision of the free range and arable enterprises at Ashlea Farm.

Financial Data

3.17 The business is planned on a sound financial basis, and a cashflow projection is appended to this report.

4. THE PROPOSED DEVELOPMENT

4.1 The applicants propose providing a temporary agricultural workers dwelling on the farm to be occupied by a full time poultry worker at the 40 Acre Site.

4.2 The proposed dwelling will allow an essential worker to reside on the holding for animal welfare and security purposes.

5. NATIONAL PLANNING POLICY FRAMEWORK

5.1 Paragraph 55 of the NPPF states that "55. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. 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;

6. EVALUATION OF THE AGRICULTURAL BUSINESS IN RELATION TO THE NPPF

6.1 Functional need is principally determined by the nature and scale of the enterprises operated and the agricultural systems employed. This agricultural business operates a free range egg laying enterprise on the site extending to 40,000 birds. The free range egg production enterprise has essential supervision requirements requiring a worker to be readily available at most times.

6.2 A high standard of animal husbandry is essential if the business is to continue to be successful. The functional needs associated with the operation of a free range egg laying unit are two-fold with supervision required for monitoring of automatic ventilation, feed and lighting systems, and for bird welfare.

6.3 In a poultry unit of this type, the system is reliant upon automatic systems for ventilation, feed and lighting. When automated systems are in use, problems can occur, such as equipment failure or power failure. The consequences of a failure in the ventilation system are such that internal temperature can rise very rapidly. Rising temperatures initially cause heat stress to the birds and eventually suffocation and death, if not rectified quickly. Disruption to the lighting system, caused by power failure, can also cause a panic incident.

6.4 The monitoring of automated systems can be alarmed against and linked to a mobile phone. Even with alarm systems the response to an alarm should be relatively instant to prevent stress and production losses.

6.5 The more important issue of functional need is the behaviour of the birds themselves when panicked. Birds housed on the floor, as distinct from laying cages, are prone to panic and crowding, resulting in smothering, if disturbed by external factors such as vermin or wild birds entering the house, disruption to lighting, aircraft noise, thunder and lightning. In an incident of panic, the birds flock and crowd in a corner of the shed, which results in large numbers of birds climbing on top of each other. A panic incident can result in large scale losses of birds through smothering. The only way in which a smothering incident can be mitigated is from the manual intervention of a stockman.

6.6 Emergencies such as panic and a smothering incident amongst birds cannot be alarmed against, but are audible outside the unit. The triggers of such an incident are also audible on the site. Therefore only a worker resident on the site would be alerted to such an incident.

6.7 The issue of functional needs associated with poultry units has arisen on a number of appeal cases, which are quoted below.

Kay Sheffield. Appeal Ref: APP/R0660/A/10/2122115, Land north west of The Beeches, Audlem Road, Hatherton, Nantwich, Cheshire CW5 7QG

The above appeal decision was against Cheshire East Council and dated 21st June 2010 and related to the functional need for accommodation on a 7000

bird free range egg unit. With regard to the functional need to reside on the site, the inspector stated;

7. It is apparent from the submitted documents and the discussion at the hearing that a large part of the egg production process relating to the welfare of the chickens would be regulated and monitored by automatic systems and that the appellant, in running the enterprise, would be alerted to any problems by suitable alarm systems. It is also apparent that any problems with the automated systems could be minimised by regular maintenance and that any disruption to these systems, whilst a threat to the welfare of the chickens, could be successfully managed if responded to quickly.

8. It is the unpredictability of the response of the chickens to unexpected incidents that would appear to pose more threat to their welfare. Incidents from as serious as predators accessing the unit to as simple as the back-up generator starting up or aircraft flying overhead could prompt a panic incident which, if not dealt with within a matter of minutes, could result in the partial or full loss of the flock.

9. The frequency of panic incidents seems to vary between enterprises and there is no way of predicting how often they might happen. **However, it is evident that if the flock is disturbed a check needs to be made to ensure it does not escalate into a panic incident. In order to be aware of an event which might trigger an incident, or to be able to hear if one is triggered, the stockman needs to be within sight and sound of the unit.**

10. I noted that to drive from the entrance to the site off Audlem Road to the outskirts of Nantwich takes less than five minutes. I also noted, and the appellant agreed, that there are properties available both within Nantwich and in the vicinity of the site that would provide a level of accommodation comparable to that in the proposed mobile home. However, it was agreed that none would satisfy the functional need for a worker to be readily available at most times.`

11. From the evidence before me I am satisfied **that it is essential for the needs of the enterprise that a full-time worker lives within sight and sound of the egg production unit** and that there are no suitable existing dwellings which would satisfy that requirement. I therefore conclude that the functional need for the development could not be fulfilled by existing accommodation in the area and that the development would therefore comply with Policies RES.5 and NE.2 of the LP and the guidance contained within PPS7.

Jeremy Youle - Appeal Decision APP/C3240/A/05/2005531 (paragraph 18.) “I have been provided with evidence that in flocks of this size there is a high risk of panic. This can quickly lead to stress, massing, suffocation and death and so would require intervention from workers to avoid significant loss of stock. Panic can be triggered, even when the birds are inside the building by predators, human intruders and by military aircraft which operate in this area. (Paragraph 19.) Given by conclusions above I do not consider that the

functional need could be met by a worker living at Mr and Mrs Bethell's house which the council considers about 1.8km from the site"

Karl P. Moxon said in appeal decision APP/V1315/A/04/1156833 (paragraph 71.) "The crucial point under this head, I consider, is that a crisis likely to have a significantly adverse effect on the welfare of the flock could arise at any time. If such an incident happened to be, for example, the intrusion of a predator (such as a dog or fox) into the site, immediate action would be necessary. (Paragraph 72.) During the summer months especially, a FREP stockman's daily hours of work do not form a single shift; rather, he is required to work for varying periods which, although they may in total amount to only eight or nine hours or so, are likely to span say, 0700 to 2200 hours. But because of the possibility of an unforeseen crisis, he needs to be on hand for the whole of those hours. (Paragraph 73.) I consider that it would be wholly unreasonable to expect a stockman to spend significant periods away from his home and family when he is not working, but is merely on stand-by in case of an emergency**. I have therefore formed the view that nothing short of a dwelling within sight and sound of the appeal site would meet the functional needs of this proposal**. (Paragraph 74.) Even leaving aside matters such as its availability and association in legal and/or policy terms with the land at Derwent Oak Farm, Derwent Oak Farmhouse is nearly 800m from the appeal site and hence does not fulfil the sight and sound criteria"

Phillip Crookes said in appeal decision APP/A3010/A/06/2026709 (paragraph 16.) "Paragraph 12 (b) of Annex A requires that the functional test included in paragraph 4 is applied, and, if satisfied, criteria (d) requires that the need could not be fulfilled by another dwelling on the unit, or by another existing accommodation in the area. Whilst automatic systems relating to temperature control, ventilation and feeding could be monitored and alarmed remotely, any failure could require attention at short notice. In addition, free range birds are easily stressed and circumstances can occur where flock reaction and panic due, for example, to sudden noise or the presence of predators can be immediate and potentially fatal to large numbers due to smothering. To this extent I am satisfied that the demands of the enterprise require a full-time worker to be readily available at most times. (Paragraph 17.) There are no other dwellings on the unit and those in the settlements of North and South Leverton are too far away to provide the immediate contact in terms of sight and sound that is necessary in the interests of animal welfare and the loss of significant flock numbers. The proposed mobile home would be approximately 150m from the production unit and in my view is the only feasible option to provide supervision of the flock at all times within sight and sound and therefore provide for a speedy response to any emergencies that may arise. (Paragraph 19.) I am satisfied that the proposed mobile home is a necessary and essential requirement of the proposed free range egg production enterprise and satisfies the criteria for temporary agricultural dwellings in Annex A of PPS7. It also complies with 2/10 of the JSP and policy 6/14 of the DLP".

Nigel Payne said in appeal decision APP/Y3425/A/00/1055405 (Paragraph 17.) "It was common ground at the inquiry that the two proposals stood or fell

together as without the new egg unit there would be no justification for a mobile home. However, neither the council nor any other party questioned the essential need for a full time worker to be readily available at most times on the site for the proper functioning of the new enterprise. This would include ensuring the security and welfare of the birds, as well as dealing with emergencies. The fact that a contract has been signed with a national supplier to accept all the produce, together with the accompanying practical advise and assistance, confirms an ability to proceed, as well as that the project has been planned on a sound financial basis. As no other dwellings in Radmore Lane appear available or suitable and in the absence of any other evidence, the criteria in paragraph in 14 of Annex 1 to PPG7 would be met. Given the location of the main building, the siting and access for the mobile home seem to be satisfactory and consistent with policy HOU4 of the SBLP. I conclude that there is an agricultural need for a temporary mobile home on the site for the three years to give the enterprise an opportunity to become established in accordance with policy H11 of the SSP and HOU3 of the SBLP".

Appeal decision APP/E2001/A/11/2165327.
"10. I appreciate that events likely to trigger panic amongst the birds might well be infrequent. Moreover, the appellant has provided only limited detail of the smother incidents that have occurred at the site to date. However, it was accepted by the Council that such incidents can and do occur in this type of operation and that they can result in a substantial loss of stock. Accordingly, I attach significant weight to this consideration.

11. The Council points out that the unit has been operating for a number of years and appears to be successful without a dwelling. However, I understand that the mortality rate at the unit is currently unusually high, and compares unfavourably with those other units owned by the appellant company where a worker's dwelling is available on the site. This suggests to me that the unit is not operating as effectively as it ought. Indeed, a letter from the company that contracts the production space at the unit expresses clear dissatisfaction with the current situation and an intention to end the arrangement if there is no improvement in the mortality rate. In any event, even if the unit remains in profit, I am mindful that the business involves a very large number of live animals, and their welfare must be assured to a reasonable degree.

12. The Council argues that the unit could be monitored from the appellant company's existing dwelling at nearby Skylark Farm, or that a dwelling could be acquired within nearby Everingham village. I note also that an agricultural worker's dwelling is available nearby. However, for the reasons already given, I am persuaded that there is a need for a dwelling within earshot of the poultry unit, which stands on its own, unrelated to any existing dwelling, and this points to the need for a dwelling on the appeal site."

6.8 The proposed development has been planned on a sound financial basis and has realistic prospects of developing into a financially sound and viable agricultural business.

6.9 In order to satisfy the functional needs of the business, the dwelling would need to be located in reasonably close proximity to the poultry unit. The proposed siting for the dwelling would satisfy this criterion.

7. CONCLUSIONS

7.1 On the basis of the information provided by the applicants, it is considered that the proposal fully accords with the provision of the NPPF, i.e. there is an essential functional need for a full time worker to reside on the site to provide for supervision of the livestock enterprises.

7.2 It is considered that a dwelling is essential for supervision, animal welfare and long term security requirements of the business.

Ian Pick BSc (Hons) MRICS
April 2014

Business Plan 40 Acre Site

Free Range Egg Enterprise Supplying Ungraded Eggs to National Packer and Distributor Foods who distribute to all major Super Markets.

40 Acre Site consists of 38,000 hens

Total Flock Income

			Adjusted to Annual
Total Eggs for Flock Based on 56 week Flock		Eggs Doz	
		943,666	£955,000

Total Flock Costs			Total Cost per Week
Bird Numbers Hen Housed		38,000	
			Week Numbers
Purchase	Per Bird		56
Hens	£4.17	£158,460	£2,829.64
Feed	£14.08	£535,000	£9,553.57
insurance	£0.35	£13,300	£237.50
labour	£2.00	£76,000	£1,357.14
land rent & drainage	£0.25	£9,500	£169.64
electricity	£0.12	£4,560	£81.43
bank over draft	£0.12	£4,560	£81.43
depreciation	£1.67	£63,460	£1,133.21
Lstock Sundries	£0.04	£1,500	£26.79
range up- keep	£0.10	£3,800	£67.86
Casual Labour	£0.10	£3,800	£67.86
Self labour & admin	£1.50	£57,000	£1,017.86
Vet Costs	£0.04	£1,500	£26.79
Chemicals	£0.03	£1,000	£17.86
Repairs/upkeep			
stone & rubble	£0.04	£1,500	£26.79
repairs	£0.05	£2,000	£35.71
cleanout	£0.19	£7,220	£128.93
Bedding	£0.05	£1,760	£31.43
Grit	£0.02	£600	£10.71
	Total	£946,520	
			Adjusted to Annual
			£873,711
		Margin	£81,289