



**Proposed Pet Breeding Unit and Dwelling at
Whale Drove, Crowland, Lincs**

January 2015

Document Title : Planning Statement - Revision A

1.1 Background ;

The applicant (Mr Ian Bruce) has been operating a 'pet breeding facility' from Allens Bridge Farm, Inkerson Common Bank, Throckenholt, Cambs for over 15 years.

The business is financially viable as evidenced by the Accountants financial report appended to this Full Planning Application.

The business, from the outset, was run from the applicant's parent's property at Allens Bridge Farm which is located some four miles to the East of the application site at Whale Drove. Last year, the applicant's parents both passed away and the property is to be sold off - as a result, the business will have to relocate. In any event, the pet breeding (mainly rabbits) facilities at Allens Bridge Farm are no longer fit for purpose and a new purpose built facility is required if the business is to continue. Aside from Mr Bruce, a further part time assistant is employed at the facility - the new proposal will enable the business to expand to satisfy the demand for pet rabbits which will create further full and part time posts. This type of business can only be operated successfully in a tranquil countryside location - an industrial unit (in a Town for instance) would not satisfy the functional needs of the business. In order

to be sustainable and to provide for an appropriate external environment for the animals, the facility requires an area of adjacent grassland - as shown on the site layout drawing.

It is essential, from an operational and security point of view, that the owner/operator of the business is 'on site' - hence the proposal to build a dwelling alongside the commercial activity that will (via a Section 106 Planning Obligation if necessary) be 'linked' to the business in perpetuity. This is essentially a 'live-work' proposal related to an existing local business activity that has proved, over time, to be viable and therefore commercially sustainable. This document explains in detail the operational reasons for the applicant to live at the site (as he does currently) - the Functional Test. Our client's Accountant (Moore Thompson) has prepared a detailed report (dated 17th April 2015 and attached) confirming the historical economic viability of the business - this element of the application forms the 'Financial Test'.

The business will have two full time employees with one part time post.

1.2 The rabbit breeding facility ;

The facility provides a supply of pet rabbits for supply on a 'wholesale' basis - there is no direct retailing of pets to the public.

The building will house up to 120 industry compliant breeding cages with a further 30 cages to contain weaned stock prior to sale. Space is allocated for the storage of circa 12 tons of feed - this is bought in 4 ton batches and delivered on a monthly basis.

The bespoke rabbit cages are built from a robust combination of wood and plastic - they are two tier and the minimum dimensions are 600 x 1200 x 500mm deep. Cages will be configured in such a way that the surrounding space allows for adequate maintenance and ventilation.

In order for the rabbits to be bred and reared efficiently and to ensure appropriate levels of animal welfare are achieved, it is essential for the operator to be 'on-site' (as is currently the case at Allens Bridge Farm) so that the rabbits 'mimic' as closely as possible the life cycle of rabbits in the wild. There are seasonal fluctuations in the rabbit breeding business and although there is demand throughout the year, sales peak at Easter and, to a lesser extent, during the summer months.

From September to December the main breeding herd is rested with winter sales produced from maiden does. The gestation period is some 28/31 days with rabbits ready for sale between 6/12 weeks depending on the breed.

Matings are carried out in batches of 40 rabbits at a time per week - after 14 days these are palpated (careful examination by hand) to ensure as far as possible that the doe is in kint. Those that have failed to conceive are returned to the buck rabbit at 14 days.

Close and regular attention to every rabbit is essential since rabbits have the almost unique ability to re-absorb the fetus back into the womb even after the 14 days, resulting in what initially appears to be a pregnancy.

The kits tend to be born in the early hours of the morning and in darkened conditions with as much as 30 + litters within a 24 hour period - unless supervised, mass losses can occur.

Fresh green are essential and will be grown on the site - see site layout.

Rabbits are collected once a week in medium sized (Transit) vans - the facility is strictly off limits to the public.

Manure from the rabbits is virtually odour free and a valuable source of fertiliser which will be collected and enhanced as a fertiliser by the application of vermiculture - the use of red worm and denderobena to break down the material rapidly thus producing a valuable organic horticultural compost. This material would be a saleable commodity after sterilisation and bagging. See Appendix A.

1.3 Legislation and Guidance ;

The welfare of rabbits is protected by the Welfare of Farmed Animals (England) Regulations 2007. Schedule 9 of these regulations contains specific conditions that apply to the keeping of rabbits. There is also a Code of Recommendations for the Welfare of Rabbits, which continues to apply under the new Animal Welfare Act.

The Welfare Code covers the following :

- Housing
- Fire and other emergency precautions
- Accommodation
- Floors
- Ventilation and temperature
- Lighting
- Mechanical equipment and services
- Space allowances
- Feed and Water
- Management
- Toe nail trimming
- Marking
- Handling and slaughter of stock on the premises
- Rabbits kept out of doors

The British Rabbit Council provide a Code of Practice that covers Housing and other rabbit welfare issues. This facility will comply with all aspects of the Code of Practice.

1.4 Husbandry Systems and Management :

The welfare of rabbits can be safeguarded under a variety of management systems. The system employed will be appropriate to the health and behavioral and physiological needs of the rabbit. This, together with the facilities available and the skill of the stockman, will determine the number of animals kept at any one time and the way in which they are grouped. Rabbits are animals which need individual and frequent attention. It is essential that the stockman should be available at all times to watch for signs of distress or disease and take prompt remedial action.

* It should be noted that the applicant has been running a pet rabbit breeding enterprise local for some considerable time and is therefore an extremely experienced operator of such facilities.

Each rabbit needs to be inspected frequently during the day because, once ill, rabbits deteriorate rapidly this requires a constant staff presence at the facility.

It is essential to establish a regular work routine. Care must be taken not to frighten the rabbits with sudden unaccustomed movement or noise, but without placing too much emphasis on quietness.

Adequate control measures will be taken to avoid disturbance by rodents and other animals.

Frequent checks must be made on the state of the bedding.

Premises and equipment must be regularly cleaned and thoroughly dried before restocking. Thorough disinfection must be carried out at suitable times to reduce the danger of continuing infection.

Vaccinations, injections and similar procedures may only be undertaken by competent, trained operators.

Mating must always be supervised, and to minimise the possibility of fighting, does should be taken to the buck.

Litters under a week of age should be disturbed as little as possible and young rabbits will not be weaned before four weeks of age.

Overgrowth of incisors can sometimes interfere seriously with feeding and cause damage to the rabbit's lips. The provision of wooden gnawing blocks particularly for breeding stock, can avoid the necessity to

undertake tooth-trimming. Where tooth-trimming is necessary, it will be performed by a veterinary surgeon or by a competent trained operator.

1.5 Emergency Arrangements ;

Emergency arrangements will be put in place to cover outbreaks of fire, the breakdown of essential mechanical services and the disruption of supplies. The operator/stockman will make advance plans for dealing with emergencies such as fire, flood or disruption of supplies to ensure that all staff are familiar with the appropriate emergency action. At least one responsible member of the staff must always be available to take the necessary action.

The design of the new building includes specific provision for livestock to be released and evacuated quickly in the case of an emergency. Materials used in construction will have sufficient fire resistance and adequate doors and other escape routes be provided to enable an emergency procedure to be followed in the event of a fire - refer to floor layout and provision of exit doors.

The building will incorporate hard wired smoke detection systems. Straw storage will be separated from livestock accommodation to reduce the risk of stock from fire and smoke - refer to floor layout. All electrical, gas and oil services will be planned and fitted so that if there is overheating or flame is generated, the risk of flame spreading to equipment, litter or straw (where used) or to the fabric of the building is minimal. All main power on/off controls outside buildings.

In case a 999 call has to be made, notices should be prominently displayed in rabbit houses stating where the nearest phone is located. Each phone should have fixed by it a notice giving instructions to the Fire Brigade on how to reach the rabbit houses.

The facility will use a local Veterinary Practice as and when their services may be required - the facility will be inspected by a qualified Vet every three months.

1.6 Ventilation and temperature ;

Ventilation rates and house conditions will, at all times, be adequate to provide sufficient fresh air for the rabbits. In particular accumulations of ammonia, hydrogen sulphide, carbon dioxide, carbon monoxide and dust will be avoided. Appropriate care will be taken to ensure that the ventilation system allows adequate air flow below cages, and dwarf walls or solid sides should be avoided wherever possible. There will be an alarm system to warn the stockman of failure of any automated equipment.

Expert advice will be taken to ensure correct temperature, airflow and humidity throughout the facility at all times - the louvered roof vents will enable a constant flow of air with appropriate air change rates. This constant air flow will also prevent the build up of ammonia. Care will be taken to protect confined rabbits from draughts in cold conditions. As a general guide the aim should be to achieve a temperature range of 10C - 20C.

Ventilation, heating, lighting, feeding and watering equipment, electrical installation and all other equipment will be designed, sited and installed so as to avoid risk of injuring the rabbits.

1.7 Accommodation Standards ;

All floors on which rabbits are kept should be designed, constructed and maintained so as to avoid injury or distress to the rabbits. For welded wire floors, mesh of suitable size should be used. Square mesh will not exceed 19 mm x 19 mm and rectangular mesh will not exceed 75 mm x 12.5 mm. Wire of not less than 2.64mm diameter will be used. The mesh will be flat and any rough spots arising during manufacture or from wear during subsequent use will be smoothed off.

1.8 Lighting ;

During the hours of daylight, the level of indoor lighting, natural or artificial, will be such that all rabbits can be seen clearly. There will be a period of darkness in each 24 hour cycle. In addition, adequate lighting will be available for satisfactory inspection at any time.

1.9 Mechanical equipment and services ;

All equipment and services including feed hoppers, drinkers, ventilating fans, heating and lighting units, fire extinguishers and alarm systems will be cleaned and inspected regularly and kept in good working order.

All automated equipment will incorporate a fail-safe device and, where the rabbits' welfare is dependent upon such equipment, an alarm system to warn the stockman of failure. Defects must be rectified immediately or alternative measures taken to safeguard the health and welfare of the rabbits. Alternative ways of feeding and of maintaining a satisfactory environment will therefore be ready for use. All electrical installations at mains voltage will be inaccessible to rabbits and properly earthed.

1.10 Space Allowances ;

The proposed new accommodation takes due of the size of the breed and natural behavior of the animals, which includes hopping, sitting with ears erect and play.

The total floor area should be sufficient to enable the rabbits to move around and to feed and drink without undue difficulty. Accommodation will allow sufficient area so that all rabbits can lie on their sides other than at times

When nesting boxes are used. The following space allowances, which are in use commercially, should be regarded as absolute minimum (this facility will significantly exceed these standards)

SYSTEM	MINIMUM FLOOR SPACE
In cages	
Doe and litter to 5 weeks of age	0.56 m2 total area
Doe and litter to 8 weeks of age	0.74 m2 total area
Rabbits 5 to 12 weeks of age	0.07 m2 per rabbit
Rabbits 12 weeks and over (other than those used for breeding) (multiple occupation cages)	0.18 m2 per rabbit
Adult does and bucks for breeding	0.56 m2 per rabbit
In hutches	
Doe and litter to 5 weeks of age	0.75 m2 total area
Doe and litter to 8 weeks of age	0.93 m2 total area
Rabbits 5 to 12 weeks of age	0.009 m2 per rabbit
Adults does and bucks for breeding	0.75 m2 per rabbit

Accommodation for rabbits over 12 weeks of age will be not less than 45 cm high, or of sufficient height to allow rabbits to sit upright with ears fully erect.

The nest box will be large enough to enable the doe to get into and out of it to feed the young without injuring them. As a guide, the nest box would be a minimum length of 30 cm and have a minimum floor area of 0.08 m2 but a larger area would be allowed for giant breeds.

The lowest side or end of an open-topped nest will be low enough to enable the doe to enter or leave the nest without risk of injury to herself or her litter, but sufficiently high to prevent the young from leaving the nest prematurely. As a guide, for most breeds of rabbits the height of the lowest side or end of the nest box should not be less than 15 cm. The nests will have an entrance of not less than 0.023 m2 in area and be sufficiently large for the doe to pass through without difficulty or risk of injury.

1.11 Feed and Water ;

A plentiful supply of clean fresh water will be easily accessible to the rabbits at all times. For example a

lactating doe with a large litter, close to weaning, may drink up to 4.5 litres of water a day. To enable all rabbits to drink satisfactorily the automated nipple drinker will be about 25 cm from the bottom of the cage.

Where bowls are used for either feed or water they will be of impervious material and of a design which cannot be knocked over and can be cleaned easily.

When fed by any system which does not allow continuous and unrestricted access to feed, all rabbits in the group must be able to feed at the same time.

1.12 Toe nail trimming ;

Toe nails of confined adult rabbits should be trimmed periodically to prevent toe damage from overgrown nails catching on the hutch or cage. Care is needed when trimming to avoid damage to sensitive tissue.

1.13 Marking ;

Where it is necessary to mark rabbits for permanent identification, tattooing is preferable to tagging which may result in damage to the ear being caused; a ring above the hock may be used but must be checked regularly to ensure it does not become tight, causing injury. Marking must only be carried out by competent operators taking care to avoid unnecessary pain or unnecessary distress to the rabbits.

1.14 Handling of stock on the premises ;

The proper handling of rabbits requires skill, and it will be undertaken only by competent persons. Rabbits should be lifted by grasping the loose skin at the back of the neck and supported by placing the hand under the hindquarters. Handling must be carried out quietly and confidently exercising care to avoid unnecessary struggling which could bruise or otherwise injure the animal.

2.00 Sustainability issues :

It is considered that the proposal accords with the NPPF and the SHDC Local Plan in relation to 'sustainability' matters - the following section articulates this premise.

*Living Working Countryside - Extracts from the **Matthew Taylor Report 2008** (applicant commentary in red)*

Together, smaller villages and hamlets outside the market towns and particularly in comparison to urban areas, face a consistent set of pressures affecting their sustainability:

- restrictive planning practice*
- lower local wages and unfulfilled economic potential, and*
- a strong trend for in-migration – which have led to very high house prices, unaffordable in relation to local wages.*

These pressures undermine the opportunities for rural communities to be economically vibrant, environmentally sustainable, socially mixed and inclusive. Local employment opportunities are limited, particularly in more highly skilled and higher paid work.

As a result, increasingly those working locally can no longer afford to live in these communities, and those living there have limited opportunities to work locally. This situation is undesirable from a perspective of fairness and social equity, but also runs contrary to the aims of creating and maintaining sustainable communities. In time, such communities will become increasingly unsustainable in every sense.

In summary, dormitory and retired communities with few local services or employment opportunities cannot provide a sustainable future for the countryside. Beyond the borders of these communities, their unfulfilled economic potential will also hold back the national economy as a whole.

Average incomes in rural areas, when measured according to where people live rather than where they work, are distorted by the effects of the people who commute to urban centres for work and a relatively wealthy retired population. This masks well the below average wage of those actually working in rural areas. Recent research has shown that 28 per cent of jobs in the most rural areas are low paid, compared to 22 per cent nationally and 18 per cent in the most urban areas.¹¹

Travel to work patterns

People working in rural areas are sometimes presumed to have a disproportionately negative impact on the environment. The argument goes that more people use their cars to get around and travel longer distances, thereby making a relatively large contribution to climate change. This assumption can contribute to planning practice that limits development in rural areas on environmental grounds.

However, there is no robust evidence to suggest that there is any systematic difference between the contributions to global warming of rural and urban areas. For example, a look at the travel to work patterns across rural and urban communities shows that they are very similar, contrary to arguments sometimes used against economic development in rural areas.

*The key difference in travel to work patterns is actually that rural residents are more likely to commute under 1 kilometre (35.8 per cent rural compared to 21.5 per cent urban working residents), while the most common commute for urban residents was between 1 and 5 kilometres. The proportions commuting longer distances were similar for both rural and urban residents (see Table 1.1) **In this case, the use of the car for transportation will be marginal given the nature of the business and the owner/operator proximity. The two members of staff are drawn from nearby villages and their proximity to the facility will result in less environmental impact from transportation that if they commuted to any of the nearby larger centres of employment such as Spalding, Peterborough or Wisbech.***

Table 1.1: Distance Travelled to Work

	% of rural residents who work	% of urban residents who work
Less than 1km	35.8	21.5
1 to 5km	17.3	31.7
5 to 10km	17.1	18.8
10 to 20km	17	15.3
20 to 40km	8.4	7.8
Over 40km	4.5	4.9
Total	100	100

Further, rural and urban residents are almost equally as likely to drive to work (60.5 and 54.8 per cent respectively), and whilst rural residents are less likely to use public transport, they are twice as likely to work from home (see Table 1.2).

Table 1.2: Method of Travel to Work

	% of rural residents who work	% of urban residents who work
Car driver	60.5	54.8
Car passenger	6.2	6
Work from home	16.7	7.5
Walk	8.7	9.5
Bicycle	2.7	2.8
Train/Underground	0.7	8.7
Bus	2.6	8.8
Other	1.8	1.9
Total	100	100

Source: Table 1.1 and 1.2, Office for National Statistics, 2001 Census

These figures highlight that rural areas are no more unsustainable on the grounds of the environmental impacts of commuting to work than urban areas. The modes of travel and distance travelled are similar. Indeed although the distances are similar, rural journey times may be quicker (and therefore less polluting) due to less incidence of congestion compared to urban journeys.

*Simply ruling out whole categories of villages as unsustainable, as too many local plans currently do, ignores the potential for enhancing the sustainability of many smaller rural communities, and the real needs of those who live and work there. **We consider the proposal to be highly sustainable - deliveries to and from the current enterprise take place weekly.***

Barriers faced by rural businesses include a lack of appropriate premises, extremely limited scope for expanding or modernising existing premises, and sometimes inflexibility within the planning system towards growth. There is also a misperception of what is and what is not 'sustainable'.

*Particular attention is given to home-based work, since this is a highly significant (and growing) factor in rural economies, with approximately one in five people in rural communities working from home, and offers the potential for highly sustainable business models. Yet home-based work, which can range from childcare to consultancy, hairdressing to architecture to web design, is often unidentified, undervalued, and under-supported by the planning system and by business support providers. This lack of recognition and support can sustain long term damage in local economies. A growing variety of business studies indicate that many firms started at home prefer to stay in the same area when they expand, and so lack of such opportunities can obstruct growth. **The applicant wishes to expand the business thereby creating further rural employment prospects.***

Contrary to an often outdated and perhaps romanticised view of the countryside, the economies of rural and urban England are much more alike than many people might imagine.

Very few economies in rural England are still driven by agriculture – and it now accounts for less than five per cent of the rural workforce. When the modern planning system was set up following the Second World War, agriculture employed far greater numbers of people in rural areas and there was a much stronger imperative to subsidise and support the industry to aid its modernisation and development.

The business mix in rural areas is now very similar to urban areas. As shown in Table 4.1, in both rural and urban areas, people are most likely to be employed in retail, manufacturing, or the service sector (public administration, education, health and other social services).

Table 4.1: Employment by Industry Type and Occupation, England¹		
	% Rural Workforce	% Urban Workforce
Agriculture, Hunting and Forestry	4.5	0.7
Fishing	0.1	0.0
Mining and Quarrying	0.4	0.2
Manufacturing	14.6	14.9
Electricity, Gas and Water Supply	0.7	0.7
Construction	7.5	6.6
Wholesale and Retail trade, Repair of Motor Vehicles	15.8	17.1
Hotels and Restaurants	4.9	4.7
Transport, Storage and Communications	5.9	7.4
Financial Intermediation	3.6	5.1
Real Estate, Renting and Business Activities	12.4	13.4
Public Administration and Defence, Social Security	6.2	5.5
Education	8.2	7.6
Health and Social Work	10.3	10.8
Other Community, Social & Personal Services	4.6	5.1
Other	0.3	0.1

Thanks to the opportunities brought about by new technology, particularly the spread of broadband, rural economies are increasingly able to overcome barriers associated with geographical distance and access to people, information and services (e.g. online banking) – and diversify into higher paid IT and knowledge based jobs.

The ability to work and start a business from home attracts many people into enterprise. Home-based working is a growing phenomenon, particularly in rural areas. Nationally, the proportion of the workforce working mainly from home doubled between the last two censuses (1991 and 2001) to around one in ten. In all types of rural area, home-based work is significantly more common than in urban areas. Seventeen per cent of working rural residents work from home, and as shown in Table 4.2, in the most rural areas (Sparse Hamlets and Isolated Dwellings) this figure is 31 per cent, compared to as few as eight per cent of urban based residents.

Table 4.2: Home-Based Working, by Rural Definition 2001	
Rural Definition	% works mainly at or from home
Hamlet & Isolated Dwelling – Sparse	31
Hamlet & Isolated Dwelling – Less Sparse	20
Village – Sparse	20
Village – Less Sparse	15
Town & Fringe – Sparse	12
Town & Fringe – Less Sparse	10
Urban – Sparse	10
Urban – Less Sparse	8

Source: 2001 Census, Office for National Statistics

A study by the Chartered Management Institute predicts that by 2018 the majority of businesses will be based from home. Sixty five per cent of businesses expect working from home to be commonplace as a way to reduce the carbon footprint and 73 per cent suggest work-life balance will be the key to job choice. This trend is certainly most advanced in rural areas.

*There is a popular misconception about economic activity in rural areas: a belief that it is based on traditional crafts and agriculture. The fact is very few economies in rural England are still driven by agriculture, which now accounts for less than five per cent of the rural workforce. The highest proportions work in the wholesale and retail trade or in manufacturing – 15.8 per cent and 14.6 per cent. This is very similar to the picture in urban areas where the respective figures are 17.1 per cent and 14.9 per cent. Rural economies are much more modern, diverse and dynamic than is often thought. Growth in the proportion of knowledge intensive business services between 1998 and 2005 increased by 46 per cent in rural areas compared to 21 per cent in urban areas. Rural economies are also characterised by a higher proportion of small and micro-businesses, self employment and home-based work. Just over one in six (17 per cent) rural working residents work from home – a figure that rises to 31 per cent in the most rural areas – compared to 8 per cent of urban based residents. **The proposal represents a rural business that is both diverse, dynamic and already proven.***

If we are to nurture these economies we need to move away from excessively restrictive and inflexible planning practices, to safeguard employment space and support small and home- based business growth.

This country's rural communities cannot stand still. Change is inevitable whether development takes place or not, and the choices we make today will shape tomorrow's character of the market towns, villages and hamlets that make up our countryside.

Outside the market towns the picture will be much more mixed. Some villages will grow substantially. Others risk seeing little or no development. These villages, "protected" from development, face becoming increasingly exclusive communities of the retired and of wealthy commuters travelling ever longer distances to work, losing their services like schools and shops, and with local jobs either lost, or serviced by people commuting in from larger towns.

*Equally, it is clear that over-zealous or ill-thought through restriction of development in rural areas has already had unintended consequences in holding back rural economies and making rural homes increasingly unaffordable – consequences which make the countryside less, not more sustainable. **We would contend that the proposal enhances the rural economy.***

Scattered across the English countryside are 16,000 small towns, villages and hamlets. These smaller rural communities – settlements with populations of fewer than 3,000 – are home to 55 per cent of all rural residents, some 6.4 million people. It is in these small communities that the challenges of unaffordable homes, low wages and declining services are at their greatest.

Restrictive planning practices are contributing to many of these villages and hamlets becoming increasingly unsustainable communities, unaffordable for those who work there, losing jobs and services. While the country plans for major housing growth over the next decade, in practice these smaller villages are often excluded from local strategies designed to meet even local housing need.

Summary (from Taylor Report 2008)

Planning must not determine the future development of rural communities against a narrow tick-box approach to sustainable development, assessing communities as they are now and not what they could be. In too many places this approach writes off rural communities in a 'sustainability trap' where development can only occur in places already considered to be in narrow terms 'sustainable'. The question planners must address is "how will development add to or diminish the sustainability of this community?" taking a better balance of social, economic, and environmental factors together to form a long term vision

for all scales of communities. A mix of housing and employment opportunities are essential for the sustainability of rural communities.

Live-Work advantages in a rural setting

- *Reduced reliance on commuting*
- *Sustainable use of property – less land and materials used, lower fuel emissions and energy use*
- *Retention of wealth creators, boosting spending power in the district*
- *Maintained and enhanced sustainability of other rural businesses servicing the live/work businesses (e.g. local shops and other facilities)*
- *Contribution to the diversification of the rural economy*
- *Improved neighbourhood security through continual occupation.*
- *Creating a 'daytime economy' (daytime work use of property)*

End of references to the Taylor Report

The NPPF and Rural Live-Work (applicant commentary in red)

The NPPF states that when drawing up their local plans, councils should 'facilitate flexible working practices, such as the integration of residential and commercial uses within the same unit'.

The NPPF offers support for growth in a number of ways;

- *'Local Authorities should approach decision making in a positive way to foster the delivery of sustainable development'*
- *'development which is sustainable should be delivered without delay'*
- *'LPAs should look for solutions rather than problems'*
- *'Significantly boost the supply of housing by forcing the LPAs to demonstrate an up to date supply of housing' SHDC does not have a deliverable five year supply of housing land.*

Core Planning Principles

The NPPF identifies 12 core planning principles. These are as follows;

- *Planning should be genuinely plan led empowering people to shape their surroundings.*
- *Creation of the opportunity to be creative in finding ways to enhance and improve places in which people live their lives. This proposal will create opportunity and improve the business prospects for a rural based business.*
- *Proactively drive and support sustainable economic development to deliver homes, business and industrial units, and thriving local places that the country needs. Plans should set out a clear strategy for allocating sufficient land which is suitable for development in their area taking account of the needs of the residential and business communities. See above.*
- *Secure a high standard of design and levels of amenity.*
- *Promote the vitality of the main urban areas whilst protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside. The proposal will not have any negative impacts on the open countryside setting.*
- *Aim for a low carbon future in a changing climate and encourage the use of renewable resources. The development will make best use of available renewable energy technologies.*
- *Conserve and enhance the natural environment and reduce pollution. Allocations of land for development should prefer land of lesser environmental value. The proposal makes good use of land..*

- Encourage the use of brownfield land provided it is not of high environmental value.
- Promote mixed use developments. *See above*
- Conserve heritage assets in a manner appropriate to their significance.
- Manage patterns of growth to make the fullest use of public transport, walking and cycling focusing significant development on locations which are or can be made sustainable.
- Support strategies which encourage health, social and cultural well being for all and deliver community and cultural facilities and services to meet local needs.

Presumption in favour of sustainable development

One of the underlying objectives of the NPPF is the presumption in favour of sustainable development. As previously mentioned above, paragraph 14 of the Framework states that at the heart of the NPPF is a 'presumption in favour of sustainable development'. Within the NPPF, sustainable is defined as 'ensuring that better lives for ourselves don't mean worse lives for future generations', whilst development is defined as 'growth'. Sustainable development is therefore about 'change for the better, and not only in our built environment'.

*The *NPPF defines the three-dimensional expression of the economic, social and environmental roles of planning and the need to balance these in policy-making and decision-taking. Whilst a precise definition of sustainable development has been given within the document, the practical definition is discussed within the remainder of the document.*

In relation to Local Planners, live/work pushes all the right buttons – eliminating the need to commute, providing a daytime presence in villages, attracting inward investment for shops, increasing local employment potential, and boosting the viability of transport, telecommunications and postal services.

There are significantly higher levels of homeworking in rural areas – 12% as opposed to 8% in urban England. And the numbers are rising. This trend has major implications for the way property is used in the countryside and in market towns. Many of the businesses that operate from home today would have had a separate office or workspace in previous years. Now a combination of high housing costs, lack of suitable workspace and the increased potential of information technology have, for many, diminished the appeal of taking on work premises – perhaps for good.

Increasingly, self-employed people in rural areas are making a positive choice to base their business in their home. Combining workspace and home is a sure way to save money and time (no need to commute).

For planners, this should represent an opportunity to reduce the strain on their districts' property and land resources – one property delivering what would otherwise require two. And it also represents a significant reduction in commuter traffic..

The Functional Test and Need

Need for new dwellings in the countryside is driven by many factors; one of the few circumstances in which residential development may be justified is when accommodation is required to enable agricultural, forestry and other rural based enterprise full-time workers to live at, or in the immediate vicinity of, their place of work.

In order to ensure any development is in accordance with the NPPF and Local Planning Policies, in most cases it is essential that a 'functional test' is undertaken.

The National Planning Policy Framework (NPPF) make clear that new houses in the countryside require special justification for planning permission to be granted.

In general, circumstances in which residential development may be justified are:

- Rural Enterprise: Accommodation is required to enable agricultural, forestry and other rural based enterprise full-time workers to live at, or in the immediate vicinity of, their place of work, or

- Heritage: The development would represent the best viable use or secure the future of a heritage asset, or
- Outstanding Design: The development is of truly outstanding design, architecture, sustainable construction methods etc.

It will often be as convenient and more sustainable for such workers to live in the main urban area or in nearby villages or in suitable existing dwellings, so avoiding new and potentially intrusive and unsustainable development in the countryside.

However, there will be some cases where the nature and demands of the work concerned make it essential for one or more people engaged in the enterprise to live at, or very close to, the site of their work. Whether this is essential in any particular case will depend on the needs of the enterprise concerned and not on the personal preferences or circumstances of any of the individuals involved.

In particular, it will be important to establish whether the stated intentions to engage in farming, forestry or any other rural-based enterprise, are genuinely financially viable. It will also be important to establish that the needs of the intended enterprise require one or more of the people engaged in it to live nearby. In this specific case these issues have been proven as it is an established financially viable business.

Functional Test criteria checklist :

Is it essential for full time workers to protect stock or business infrastructure from theft and/or vandalism day and night?	Yes
Has the enterprise been established for three or more years?	Yes
Has the enterprise been profitable for at least one of the three years it has been established?	Yes
Is there a clear prospect of the enterprise remaining economically viable in the long term?	Yes
Are there any other suitable dwellings nearby which can meet the housing need?	No
Is the size of the dwelling proportionate to the functional requirements of the rural enterprise?	Yes
Is the market value of the dwelling proportionate to the current and/or future income generated through the rural enterprise?	Yes
Is the dwelling sited so as to meet the identified functional need and does it relate well to existing buildings and/or other dwellings?	Yes
Are the proposals in accordance with all relevant policies in the Local Plan and NPPF?	Yes

Given the nature of the operation described in detail on section 1.1 to 1.15, we would contend that the functional test has been passed in relation to this proposal.

Summary

In order for the applicant's long standing business to continue and indeed expand, a new purpose built facility needs to be created. Additionally, the development of a dwelling 'linked' to the commercial activity is crucial for operational and security reasons. The applicant is quite agreeable to a suitably worded Planning Condition that requires the commercial facility to be completed prior to the development of the associated dwelling and a further standard Condition 'tying' the dwelling to the business activity on the site.

The attached report from the applicant's accountants provides evidence of the financial viability of the business coupled with confirmation of the commercial history - in this regard, we would contend that both the Financial and Functional Tests are proven.

The fact that this is a demonstrably sustainable development combined with the clear 'need' for the dwelling for operational and security reasons presents, in our view, a compelling case for the proposal to be supported by the Local Planning Authority.

As this application seeks to re-locate an existing local business, it may be prudent for the Case Officer to inspect the existing set up at Allens Bridge Farm - this can be arranged as necessary.

John Dickie M.I.A.S., M.B.Eng

John Dickie Associates
Manor Barn, Wilsthorpe,
Stamford, Lincs PE9 4PE
Tel 01778 560811 Fax 01778 561167 jda@ndirect.co.uk



Appendix A

Rabbit Manure and Vermiculture ;

An average rabbit will produce approximately 0.5kg (1lb) of manure per week - some 23kg per year. The scale of the proposed facility is such that the anticipated annual manure output per year would be up to 5 tons - 5,000 kg per year - circa 100 kg a week. In terms of volume, 100 kg of rabbit manure (collected but uncompressed) is some 1.5 – 1.8 cubic metres.

Unlike other animal manure, rabbit manure is relatively dry and pelleted. It has approximate values of 3.7% nitrogen, 1.3% phosphorus, 3.5% potassium, and also contains many trace elements such as calcium, magnesium, boron, zinc, manganese, sulfur, copper and cobalt to name a few. Most types of animal manure contain high nitrogen levels that can burn the roots of plants when applied fresh. Rabbit manure, however, is considered "cold" manure that can be freely applied directly to vegetable and flower gardens, shrubs, trees, potted plants and lawns without danger of burning. There is no weed-seed problem and little danger of contaminating of consumable crops. More than just the high NPK values of rabbit manure it is loaded with a host of micronutrients as well as organic matter that improves soil structure, drainage, and moisture retention.

Rabbit manure along with wasted rabbit feed from the elevated hutches makes for some of the finest worm feed. Additionally, earthworms eliminate unsightly manure piles, odour, and fly problems.

Vegetable gardens, pastures, and flower gardens all will benefit from using rabbit manure. It helps retain soil moisture and soil structure. The biogenic material that will be produced at this proposed facility will be used to spread back onto the grassland as a compost to enhance the harvested grass.

Although fresh rabbit manure is considered a valuable garden fertilizer, its use in concert with vermiculture (vermicomposting) creates a more valuable and useful horticultural composting material whilst also propagating worms for use as a fish food. The applicant has a long term contract to supply worms as a feedstock for a local fish farm - Willowcroft Fisheries.

VERMICOMPOSTING - AN OVERVIEW

Vermicomposting, is considered to be a branch of composting but one which relies on the use of selected species of earthworms, working with microorganisms, to achieve accelerated decomposition. The main advantages of vermicomposting compared to composting is the potential for producing a comparatively nutrient-rich compost. What makes this system really work is the use of a specially selected species of earthworms that maximise the level of decomposition and transform organic wastes into high-grade compost. Traditional composting is both labour and machinery intensive whereas with vermicomposting it is the earthworms that fragment, mix and help aerate the waste. While vermicomposting and composting both involve the aerobic decomposition of organic matter by microorganisms, there are important differences in the way the two processes are carried out.

The most notable being that vermicomposting is carried out at relatively low temperatures (under 25°C), compared with composting, where pile temperatures can exceed 70°C. The intention with traditional composting is to stack waste material in sufficiently large piles so that the heat produced in the intense breakdown of organic matter is retained in the compost pile. This temperature increase stimulates the proliferation of heat loving (thermophilic) microorganisms and it is mainly these that are responsible for the decomposition. With vermicomposting it is vitally important to keep the temperature below 35°C, otherwise the earthworms will be killed. It is the joint action between earthworms and the aerobic microorganisms that thrive in these lower temperatures (mesophilic) that breaks down the waste. Hence it is common with vermicomposting systems to apply waste frequently in thin layers, a few centimetres thick, to beds containing earthworms in order to prevent overheating and to help keep the waste aerobic. It is difficult to directly compare composting with vermicomposting in terms of the time taken to produce stable and mature compost products. With vermicomposting, particles of waste spend only a few hours inside the earthworm's gut and most of the decomposition is actually carried out by microorganisms either before or after passing through the earthworm. Hence, earthworms accelerate waste decomposition rather than being the direct agent.

VERMICOMPOST

Vermicompost is the processed material that is egested from earthworms as casts. As earthworms feed on the rich diet of organic matter and microorganisms in waste, this ingested material is finely ground by the earthworms gut. This helps microorganisms decompose the organic matter and stimulates mineralization of complex compounds into simple nutrients, easily utilized by plants.

At the same time the organic matter and microbial cells are glued together by the secretions from the earthworms gut forming casts with excellent physical characteristics. The amount of time that the waste spends in the earthworm gut is only a few hours and therefore the egested material is very microbially active and continues to decompose and mature in the form of vermicompost. The characteristics of the feed material or waste will often determine the characteristics of the final vermicompost. However, compared with windrow composts, vermicomposts are likely to contain higher levels of plant available nitrogen because vermicomposting temperatures and nitrogen losses are typically much lower. Although it is known that some species can selectively accumulate and concentrate particular heavy metals from waste sludges, it is not possible to use earthworms to "clean up" contaminated wastes. As with most waste-derived composts, vermicompost when used as a plant growth medium is likely to produce better results when amended with other materials. This is because the vermicomposts made from many wastes can be very rich in nutrients and too alkaline for optimum plant growth. Vermicompost mixes have sometimes performed better than commercial and compost-based products. Mixing vermicompost with equal volumes of coir, for example, is usually sufficient to produce good plant growth media but a feature of vermicomposts is that often only small amounts in plant growth mixes (10 - 20%) give excellent results.



TYPICAL FLOW THROUGH WORMERY

This fully enclosed system features a bi-panel lid, heavier insulation, a blower to help with moisture and oxygen level control, and a built in finished vermicompost harvesting compartment.

Advantages of 'flow through' :

- Harvesting begins 6-8 weeks after setup.
- Year around use, 365 days a year.
- Highly aerobic conditions are easily maintained
- No loss of nutrients due to seepage into the ground.
- No need to turn materials
- After initial inoculation no further worm population will be needed. The population will propagate and maintain ample populations to process the organic feedstock.

Appendix B - Site Layout



Visibility Splays
within the adopted highway (verge) a clear and uninterrupted visibility splay in each direction can be achieved in excess of 2.4m (X) and 215m (Y)
The visibility splays shall be free of any obstruction over a height of 600mm above footway level)
Vehicle to pedestrian visibility splays measuring 2m x 2m shall be provided.

Drawing No JDA/2014/315//PL/002

PLANNING APPLICATION DRAWING