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## **PLANNING STATEMENT**

### **ERECTION OF 2NO. AGRICULTURAL WORKERS DWELLINGS**

**PREPARED FOR:**

Land at Pear Tree Hill Road  
532615,317390  
Grid Ref TF32611738  
Whaplode Drove  
Spalding PE12 0SL

**16<sup>th</sup> May 2025**

**PREPARED BY:****James Whilding****MRICS FBIAC****Managing Director****ADDRESS:****Acorus****Addlepool Business Centre****Woodbury Road****Clyst St George****Exeter****Devon****EX3 0NR****DIRECT LINE:****01392 873900****EMAIL:****[planning@acorus.co.uk](mailto:planning@acorus.co.uk)**

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## **1.0 INTRODUCTION**

1.1 Stuart Adams of Holbeach Poultry Ltd/Bowler Adams LLP (the 'Applicant') has instructed Acorus Rural Property Services Ltd (Acorus) to prepare an agricultural dwelling house appraisal to accompany a planning application for the siting of 2no. agricultural worker's dwellings on Land at Pear Tree Hill Road, Whaplode Drove, Spalding.

1.2 This appraisal is prepared in accordance with the following and considers the essential need for 2no. tied dwellings to serve the new farm business.

- National Planning Policy Framework (NPPF) published in December 2024
- Planning Practice Guidance
- South East Lincolnshire Local Plan - Adopted: March 2019.

1.3 Acorus Rural Property Services is a rural planning and design consultancy and part of the NFU group of companies. The author is James Whilding, a qualified Chartered Surveyor (MRICS) and Fellow of the British Institute of Agricultural Consultants (BIAC). As a rural planning consultant, he has been engaged by Defra, LPAs and private clients to advise on planning matters, and this has been the case for 30 years. In relation to the poultry sector, he advises some of the main integrators in the UK, in addition to smaller scale private producers.

1.4 As members of the Royal Institution of Chartered Surveyors, Acorus has the necessary expertise to provide an opinion on the above application.

## **2.0 THE PLANNING POLICY FRAMEWORK**

### **2.1 NATIONAL PLANNING POLICY**

2.1.1 The Government introduced revisions to the NPPF in December 2024. Paragraph 84 states:

Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:

- a) **there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;**
- b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;
- c) the development would re-use redundant or disused buildings and enhance its immediate setting;
- d) the development would involve the subdivision of an existing residential building; or
- e) the design is of exceptional quality, in that it:
  - is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and
  - would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.

2.1.2 In respect of supporting the rural economy, at paragraph 84, the Framework promotes policies and decisions that enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
- b) the development and diversification of agricultural and other land-based rural businesses;
- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

## **2.2 GOVERNMENT GUIDANCE**

2.2.1 On 22<sup>nd</sup> July 2019, the Government introduced guidance under the Planning Practice Guidance (PPG) as to how the need for isolated homes in the countryside for essential rural workers can be assessed when considering paragraph 80 of the NPPF. Considerations could include the following:

- evidence of the necessity for a rural worker to live at, or in close proximity to, their place of work to ensure the effective operation of an agricultural, forestry or similar land-based rural enterprise (for instance, where farm animals or agricultural processes require on-site attention 24-hours a day and where otherwise there would be a risk to human or animal health or from crime, or to deal quickly with emergencies that could cause serious loss of crops or products);
- the degree to which there is confidence that the enterprise will remain viable for the foreseeable future;
- whether the provision of an additional dwelling on site is essential for the continued viability of a farming business through the farm succession process;
- whether the need could be met through improvements to existing accommodation on the site, providing such improvements are appropriate taking into account their scale, appearance and the local context; and
- in the case of new enterprises, whether it is appropriate to consider granting permission for a temporary dwelling for a trial period.

Employment on an assembly or food packaging line, or the need to accommodate seasonal workers will generally not be sufficient to justify building isolated rural dwellings.

## **2.3 LOCAL PLANNING POLICIES**

- 2.3.1 The Local Plan appears to be silent on the provision of dwellings in the open countryside. Consideration should therefore revert to the NPPF and relevant guidance notes as detailed above.

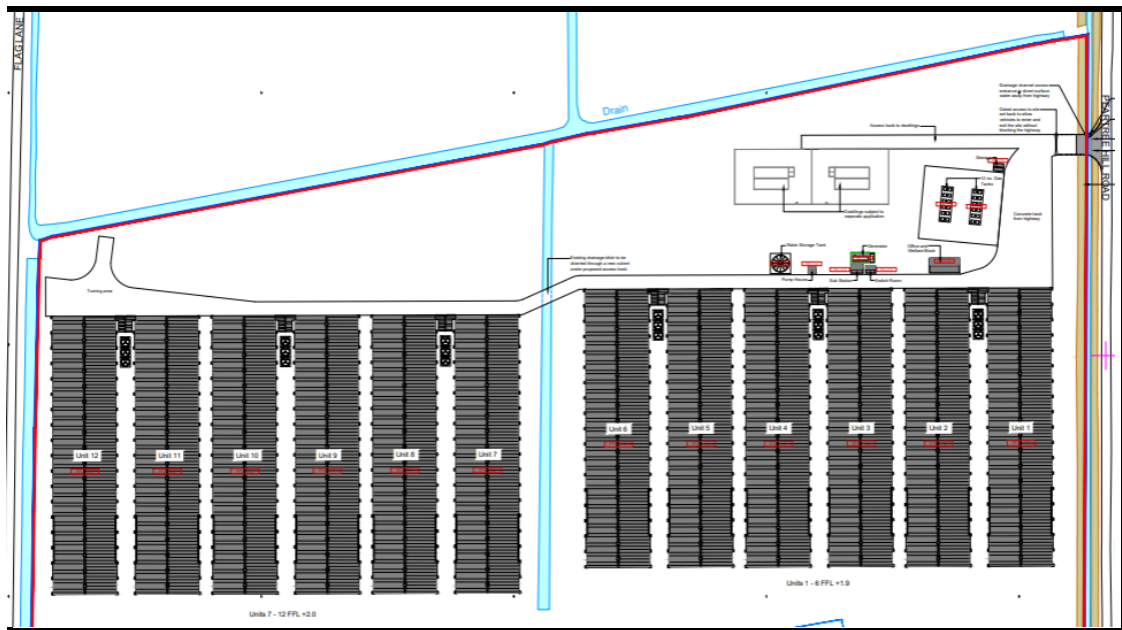
## **3.0 THE FARM BUSINESS**

### **3.1 General Information**

- 3.1.1 A planning application has recently been submitted to South Holland District Council under reference H23/0313/25. The proposal relates to a green field site accessed off Pear Tree Hill Road and the provision of 12 poultry houses each measuring 80ft x 360ft (28,800sqft or 2,675sqm) for broiler (meat) production). The total footprint of the buildings extends to 345,600sqft (32,100sqm).

3.1.2 In addition to the growing area, the following will also be provided as part of the development:

- New field access
- Vehicle parking and turning
- Hardstanding for generator
- Substation
- Gas tanks
- Dead bird building
- Attenuation basin as part of SuDS scheme



3.1.3 The current application does not include the provision of on-site accommodation for a key worker, hence the reason for this submission. Due to the scale of the enterprise and the cost of the investment, planning permission is being sought for the siting of 2no. rural worker's dwellings on the unit to enable key staff to be available at short notice at all times, including emergencies, rather than living in a nearby town or village.

## 3.2 Stocking

3.2.1 The proposal is for broiler (chicken meat) production whereby chicks are placed within the buildings as day olds and finished birds removed in 2 stages; 35% of the crop is thinned at day 30 with the remainder cleared day 42. A further 7-10 days at the end of each cycle are required for cleanout and preparation of the buildings for the incoming flock.

- 3.2.2 On average, there will be 7.4 crops per annum. Bird numbers will be permitted for no more than 690,000 bird places, however with reduced stocking due to higher welfare requirements from the customer, output will be at 552,120 places and an annual output of approximately 4million birds. At the end of each crop, the birds are transferred off the holding for processing and then onto major supermarket chains and restaurants.

#### **4.0 LABOUR**

- 4.1 Whilst an 'all in all out' system, the site will be run with a site manager for each unit of 6 buildings. In addition, there will be 4 other general workers, all of which will be full time staff and contracted to work a 46 hour week.
- 4.2 This is a 24 hour a day, 365 days a year operation where there needs to be a continual presence and support on hand to deal with issues which may occur on the site at any time, day and night. Without the staff presence on site, the business would fail to run effectively.
- 4.3 To understand more clearly the labour need on the holding for a new enterprise in particular, a theoretical labour calculation is prepared based on standard man days (SMDs) and amended where necessary to reflect local variance. It provides a general estimate of the holding's farm labour requirement with a standard man year equivalent to 2,200 hours (275 days). This is based on a 45 week year of 39 hours per week after holidays, illness etc. having been deducted plus an average of 10 hours overtime per week. Note the SPD refers to a 37 hour working week.
- 4.4 The following labour calculations are based on standard data quoted in the John Nix Farm Management Pocket book 55<sup>th</sup> Edition and the Agricultural Budgeting and Costing Book (ABC – 99<sup>th</sup> Edition November 2024) and relate to the prospective chicken bird numbers. Nix refers to a figure of 0.002 standard man-days (SMDs) per bird produced over the year, and for a large-scale automated unit, it also refers to a 32,500 broiler unit producing 225,000 birds per annum being equivalent to a full time labour requirement – equivalent to 1 labour hour per month per 100 birds. ABC refers to 0.011 SMDs per bird place (and includes for catching and cleaning).

a) Nix calculation

$3,865,000 \text{ birds per annum} \times 0.002 = 7,730 \text{ SMDs (divided by 275)} = 28.1 \text{ FTE}$

$552,120 \text{ bird places divided by 32,500 (a full time unit)} = 16.9 \text{ FTE}$

b) ABC calculation (includes cleaning and catching staff)

$552,120 \text{ bird places} \times 0.011 = 6,073 \text{ SMDs (divided by 275)} = 22.1 \text{ FTE}$

- 4.5 The above SMD calculations show a full-time equivalent labour requirement of up to 28.1 FTEs for the proposed chicken rearing business which also accounts for depopulation and cleaning of buildings. The standard data is therefore significantly different to the actual labour provision on the unit. Regardless, it is clear that this is a sizeable poultry enterprise and the need relates to more than a full time worker.

## **5.0 BUILDINGS AND FIXED EQUIPMENT**

- 5.1 As detailed previously, subject to planning, the proposed farm will provide purpose built broiler accommodation for 552,120 bird places based on 12 buildings and associated infrastructure.

## **6.0 DWELLINGS**

- 6.1 There are no dwellings owned or available to the business to meet the identified need at the site.

## **7.0 REASON FOR THE APPLICATION**

- 7.1 Permission is sought for the siting of 2no. agricultural worker's dwellings to accommodate the farm managers and enable them to undertake their key functional roles, whilst being available at short notice, in case of emergencies. Given the nature and extent of the activities, such a full-time and all-year-round role cannot be provided from off the site.

## **8.0 FUNCTIONAL NEED**

### **8.1 Introduction**

- 8.1.1 A functional test is needed to understand what it is about the running of the business that requires someone to be present most of the time. This need must relate to the business based on the stocking and cropping requirements and not the personal needs of those running the business. The need must also relate to a full time worker.

8.1.2 I consider that, given the nature and scale of the activity, there is a genuine need for farm manager accommodation on the site to enable the two staff to be available at short notice at all times rather than living in a nearby centre or village. It will become clear that it is not possible for the rural enterprise to run effectively without having the key workers living on site.

8.1.3 The functional need in this case is based on the day-to-day management and welfare requirements of the birds. Failure to provide the necessary supervision and prompt attendance to emergencies could result in significant bird loss and financial harm to the business. The fact there has been no dwelling associated with the turkey rearing site is no indication of need. These are much larger birds which are less susceptible to stress.

## **8.2 Legal Requirements**

8.2.1 Functional need, i.e. what is it that makes it essential for the proper functioning of the enterprise for one or more workers to be readily available at most times, is typically determined by the nature and scale of the operation concerned and where a suitably qualified and experienced worker is needed to be on hand day and night in case birds (as in this case) require essential care at short notice.

8.2.2 Functional need is based on animal welfare, although consideration should also be given to site security and business efficiency. Without well cared for animals and a secure site against theft, damage etc., the proper functioning of the business is significantly affected. Typically the need arises outside of normal working hours where the immediate attention is necessary and the key staff are not available.

8.2.3 Responsibility for the welfare of the birds is firmly on the 'keeper', i.e. 'the person responsible for or in charge of animals whether on a permanent or temporary basis.' It is an offence under the Agriculture (Miscellaneous Provisions) Act 1968 to cause unnecessary pain or unnecessary distress to any livestock. All farmed animals must be managed in accordance with the Codes of Recommendations for the Welfare of Livestock, and in this case the Code of Practice for the Welfare of Meat Chickens and Meat Breeding Chickens (see following link).

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/694013/meat-chicken-code-march2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/694013/meat-chicken-code-march2018.pdf)

- 8.2.4 The aim of the current Welfare Codes is to encourage all those who care for animals to follow the highest standards of husbandry. Without good stockmanship, day or night, animal welfare can never be properly protected.
- 8.2.5 The Code is considered within a framework that was developed by the Farm Animal Welfare Council and known as **‘The Five Freedoms’** which are:
1. **Freedom from thirst and hunger** – by ready access to fresh water and a diet to maintain full health and vigour;
  2. **Freedom from discomfort** – by providing an appropriate environment including shelter and a comfortable resting place;
  3. **Freedom from pain, injury or disease** – by prevention or rapid diagnosis and treatment;
  4. **Freedom to express normal behaviour** – by providing sufficient space, proper facilities and company of the animals’ own kind;
  5. **Freedom from fear and distress** – by ensuring conditions and treatment which avoid mental suffering.
- 8.2.6 The stock-keeper has the most significant influence on the welfare of animal; they should be knowledgeable and competent in a wide range of animal health and welfare skills, including handling, preventing and treating lameness, preventing and treating internal and external parasites, giving medicines by injection, providing appropriate care to sick and injured animals and management of animals to minimise aggression.
- 8.2.7 Badly managed and unhealthy birds will not thrive, and it is essential that the stock-keeper should watch for signs of distress, disease or aggression towards a bird by others in the group. To do this, it is important that stock-keepers have enough time to inspect the stock, check equipment and take action to deal with any problem.
- 8.2.8 As with all livestock holdings, in addition to complying with the Welfare Codes, there are other instances when emergencies can occur which demand an immediate response, and so all stock-keepers should be aware of the importance of regular inspections and be familiar with the normal behaviour patterns.

### **8.3 Poultry (Broilers)**

- 8.3.1 As all the birds are reared within closed houses, they are solely reliant on the farm staff to regulate the environmental conditions to ensure their welfare. The chicks will come to site as day olds and reared on for 42 days (allowing 7 days for cleanout prior to the next crop). These are small, frail birds that are vulnerable to changes in regime. Whilst all feeding, drinking and ventilation systems can be automatically regulated, to a degree there remains a need for frequent manual inputs.
- 8.3.2 Other than the provision of food and water, the most important management aspect with intensively managed poultry is the control of ventilation. Ventilation not only regulates the quality of the air that the birds breathe but it is also the principle factor in temperature regulation.
- 8.3.3 Temperature will be controlled within the buildings during the growing cycle by heating and ventilation systems; a pre-warmed temperature of 32°C on day 1 of the flock cycle and reducing to 18°C over the crop's cycle. At each stage of a bird's development there will be a certain thermal comfort zone. Within this broader zone there will be a temperature range of 1-2°C in which a bird makes best use of feed energy for growth.
- 8.3.4 There is also a clear welfare element to maintaining appropriate temperatures which goes over and above any financial goals. If temperatures become too low birds tend to huddle together and potentially suffocate. If they are too high then heat stress can lead to significant distress and potentially death.
- 8.3.5 Whilst internal house temperatures are automatically monitored and alarms triggered if parameters breached, there still needs to be someone in close proximity to the unit to take the appropriate remedial action.
- 8.3.6 As with any system that relies on mechanical equipment, failures are not uncommon and it is essential for someone to be onsite at all times to respond immediately.

- 8.3.7 As outlined, ventilation also acts as the primary control of fresh air and ammonia levels within a poultry house. Without sufficient ventilation, CO<sub>2</sub> levels from bird respiration may exceed safe levels. Likewise, adequate ventilation reduces humidity, keeps litter dry and in turn prevents ammonia build up before it can occur. If ammonia levels do rise then increased ventilation can help reduce these.
- 8.3.8 Failures in ventilation equipment are one of the biggest threats to bird welfare on an intensive poultry unit. It is only with frequent stock inspection that problems can be avoided.
- 8.3.9 The frequent checking of the physical condition of stock not only meets best welfare practices but also helps to ensure optimum bird performance. Comb and wattle colour, muscle tone and level of activity can all be indicators of bird health. A move away from normal in anyone of these areas could indicate disease, overfeeding/underfeeding and incorrect ventilation/temperature. Without appropriate remedial action all these factors can impact on bird welfare.
- 8.3.10 Veterinary comment from the largest poultry based vet practice in the UK regarding a similar unit raised the following issues:
- Bird welfare – farm animals require 7 day a week care, 24 hours a day.
  - Young chicks will be particularly vulnerable to illness, environmental conditions and require regular checking throughout each 24 hour period.
  - Regular inspections are made as early as 6.30am and as late as 10.00pm by trained personnel.
  - System alarms direct to phones can alert staff however human intervention is needed to reset temperature, watering and feeding systems.
  - A swift response and rectification of an emergency (potentially within 15 minutes) is needed to avoid potential bird loss.
  - Panic due to a fright can lead to bird smothering and potentially significant bird loss (20%+).
  - CCTV can be helpful in monitoring birds however to be truly effective the observer must be close to the buildings for the system to work and be of benefit.

## **8.4 Biosecurity**

8.4.1 As a result of bird flu etc. biosecurity has become ever more important on farms. Biosecurity means reducing the risk of disease occurring or spreading to other animals. Good biosecurity can be achieved through:

- good management/husbandry;
- good hygiene;
- reducing stress on the herd;
- effective disease control systems such as vaccination and worming programmes.

8.4.2 Biosecurity results in farm units being more secure from the introduction of new infectious diseases and the spread of any diseases on the unit itself being kept to a minimum. It is especially important on a poultry unit. All movements on and off the farm have to be accurately recorded and it is important that disinfectant and disease control procedures are carefully observed.

8.4.3 Detection and attendance to emergencies, for example, building fires, livestock escapes and injuries in order to save life and minimise animal distress are equally important and can happen at any time of the day and night.

8.4.4 Whilst considered a secondary matter, it is also important that the overall security of the business and premises are maintained so that if intruders are on the site, their presence is detected and appropriate action taken. Thefts and break-ins cost the agricultural industry around £45m per annum according to the NFU. In this instance there is a risk of equipment and/or stock being stolen from the site if the site is not occupied.

## **9.0 VIABLE BUSINESS**

9.1 Given this is a new enterprise, a budget has been prepared using data from John Nix Farm Management Pocket book (55<sup>th</sup> Edition) and information from the client. As the site will be leased out to a major integrator, a second budget has also been prepared by the applicant's accountant to highlight viability for the landlord too. The information confirms that the business is viable in accordance with the requisite financial test. This confidential financial data is available to the LPA upon request.

## **10.0 ALTERNATIVE ACCOMMODATION**

- 10.1 It is confirmed that there are no dwellings on the site, buildings for conversion or any existing accommodation in the area which are suitable and available to meet the needs of this particular unit.
- 10.2 Following from online checks on Rightmove, it is confirmed that there are no properties available to rent or buy within 0.5 miles of the unit.
- 10.3 Policy for many years has been clear that isolated new houses in the countryside require special justification for planning permission to be granted. One of the few special circumstances is to enable agricultural, forestry and certain other full-time rural workers to live at, or in the immediate vicinity of, their place of work. As in this case, due to the nature and demands of the work concerned, it is essential for the key worker to live at, or very close to, the site of their work.
- 10.4 A functional test is necessary and has been undertaken to establish whether it is essential for the proper functioning of the enterprise for one or more workers to be readily available at most times. To be readily available, the key worker needs to be accommodated on site.

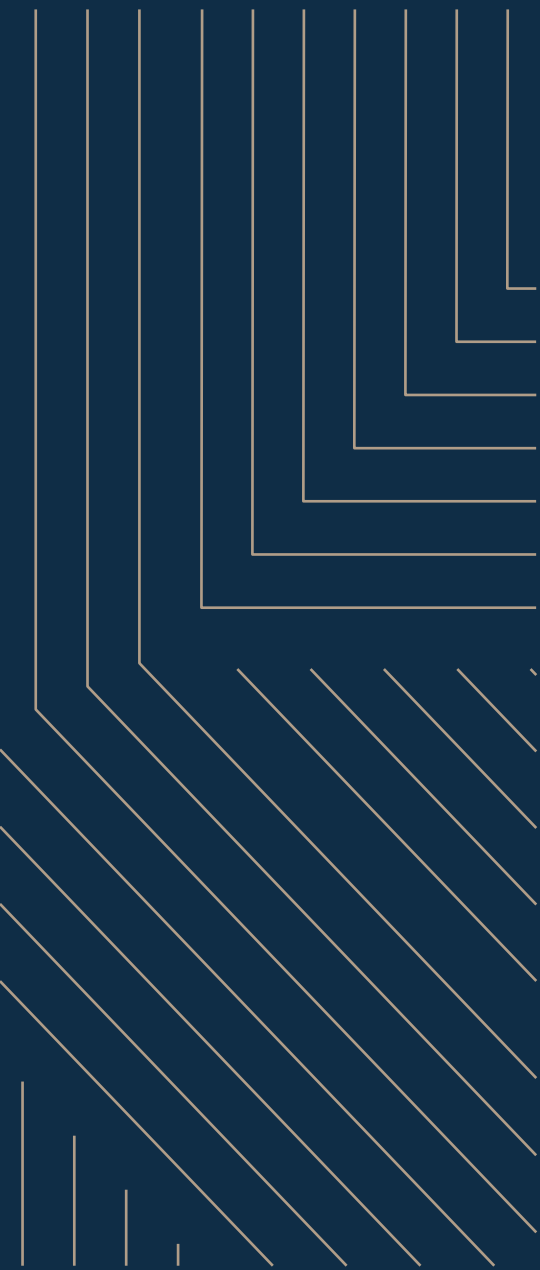
## **11. CONCLUSION**

- 11.1 Based on the activity undertaken on the holding, it is considered that:
- There is an essential need for two dwellings to be placed on the unit to provide the necessary on-site farm manager supervision otherwise the proper functioning of the business will be severely affected;
  - The need relates to a minimum of 2 full time workers;
  - There is clear evidence that the business is profitable and has every prospect of being viable in the near future;
  - There is no alternative accommodation available either on the holding or in the locality; and
  - This is considered to be sustainable development in a rural area.

- 11.2 In considering the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) and the South East Lincolnshire Local Plan, we consider that the essential need for key worker accommodation on the site is fully justified.

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