

Planning Statement
by Paul Smith Associates.

Planning Application Submitted by Mr. and Mrs. M. Soble
for
the Siting of Temporary Living Accommodation for Agricultural
Workers, Whitethorn Farm, Carey, Herefordshire. HR2 6NG.

1.0 Background.

1.1 The applicants bought this 18 hectare holding in September 2004 since which time they have established an organic horticultural enterprise. The holding completes organic conversion in June 2006. It comprises Grade 1 land and it has been planted primarily with top fruit orchards including apples, pears, plums, and cherries, soft fruit and vegetable areas. The holding has achieved Soil Association registration and qualifies for DEFRA grants for organic conversion and environmental stewardship.

1.2 To help restore the bio-diversity of the holding and improve protection over 500 trees have been planted using primarily native species to extend the existing woodland together with new under-planting to replace the dead and dying trees. Over 1000 metres of hedgerow has been planted to replace the hedges grubbed out over the last 20 years. Large areas are left uncultivated and un-mown as wildlife habitats. The orchards comprise more than 70 varieties and are planted in a more traditional manner with wider spacing and mixed grass and wildflowers growing below.

1.3 The farm implements good organic and sustainable farming practices as much as possible using lengthy crop rotations and fertility building leys to reduce pest and disease problems. The only additions are farmyard manure from neighbouring farms and green waste compost from council composting sites as a soil improver and mulch.

1.4 The farm is run on a full-time basis by the two owners with the help of seasonal workers and local contractors. As a response to the growing needs of this holding, the applicants have constructed a farm track, a storage barn, pole barn, a borehole for irrigation purposes and a greenhouse in addition to the siting of temporary polytunnels. The seasonal workers are accommodated in a temporary mobile home. The applicants have been able to rent a nearby holiday cottage property as an interim measure. However, their occupancy is reaching an end. The use of this property as holiday accommodation is soon to resume and there exists no other accommodation available to them. The needs of the holding now compel the applicants to live on-site so as to supervise and manage the unit appropriately.

1.5 The applicants have proven business experience and horticultural skills to ensure the holding is a viable venture. They also place significant emphasis upon environmental and local economic benefits. Sustainable farming is essential to retain the inherent qualities and beauty of the local area and traditional farming methods with low inputs and dedicated wildlife areas are a valuable resource. The wide range of crops makes more demands upon the applicants in terms of management and close supervision than would be if they adopted non-organic farming practices. However, this wide range of crops reduces the risk, makes better use of labour and allows more produce to be sold locally throughout the year. Better crop rotations for pest and disease control can also be established.

1.6 Despite the holding being relatively small scale and labour intensive, a good financial return will be achieved due to the range of valuable crops and direct sales to local markets. The holding hopes to be able to employ in time one or two local workers on a permanent basis. The farm has already established local markets with restaurants, speciality and convenience stores as well as number of local residents seeking out good organic produce. The applicants believe that there is excellent potential for a small farm shop and local box scheme.

1.7 In all, the farm contributes increasingly to the aims of Area of Outstanding Natural Beauty with its adoption of sustainable agricultural practice, farming for wildlife and by providing a range of produce to local people and businesses.

1.8 The basic infrastructure is now in place to establish a successful future for this enterprise. However, the impending loss of the applicants' temporary and unsecured living accommodation threatens to undermine their business plans and the future viability of their holding. It is under these circumstances that this planning application is submitted.

2.0 Relevant Development Plan Policy and National Planning Statements.

2.1 To be successful, such applications must accord with the development plan and PPS7 'Sustainable Development in Rural Areas' unless special circumstances dictate otherwise.

2.2 In support of this application, two independent reports produced by Mr. Keith Worsley and Mr. Roger Hitchings, Head of The Organic Advisory Service, are attached (see Appendix 1). Both Mr. Worsley and Mr. Hitchings, as experts in this field, have advised the applicants on the establishment and organic conversion of the holding.

2.3 Paragraph 12 of Annexe A to PPS7 permits the grant of planning permission for temporary agricultural living accommodation provided that an applicant satisfies the following criteria.

(i) Clear Evidence of a Firm Intention and Ability to Develop the Enterprise.

2.4 The applicants established their holding 20 months ago and since that time have committed themselves and have made substantial investments in this holding including the erection of buildings. The applicants have assumed the responsibility of employing and accommodating seasonal workers and have rented a house in the hamlet for themselves whilst they establish their holding.

2.5 In addition, the applicants have undertaken extensive research and have planned their holding meticulously resulting in its Soil Association Organic registration and in its Organic conversion next month. The applicants chose this holding as it comprises Grade 1 agricultural land and a topography, low frost risk and good water source ideal for horticultural (see paragraph 3 of Mr. Worsley's letter).

2.6 As part of this process, the applicants have produced an overview of their holding and a business plan. This information addresses confidential matters and the applicant is reticent to place it upon a file open to the public. However, the applicants do not object to presenting this information to officers and their agricultural consultant on a confidential basis and have done so under separate cover for their consideration. Nevertheless, Mr. Worsley had provided a financial appraisal of this holding upon which the Council can rely. This business plan shows that this holding has been established on a sound financial basis with substantial investment in orchards and long-term perennial crops and the necessary infrastructure although the enterprise is debt-free.

2.7 There is clear evidence of the applicants' firm intention is to continue to be engaged in farming and that they are willing and able to continue to realise their business plans. Both Mr. Worsley (paragraph 14 of his letter) and Mr. Hitchings (see his conclusions) confirm this assertion.

(ii) Whether there exists an Essential Functional Need for One or More Workers to be Readily Available at Most Times.

2.8 The applicants are the primary workers on this holding and it is essential for them to be on site and readily available at all times. The holding comprises a wide range of crops, growing aids, livestock and facilities requiring close management and supervision throughout the year.

2.9 It is important to note that organic horticultural and animal husbandry are much more labour intensive than conventional farming relying upon a more 'hands on' intuitive approach in harmony with nature for nutritional, pest and disease management rather than a pre-designed preventative program of chemical sprays and routine treatment with drugs.

2.10 Close climate control is essential for the raising of plants from seed in the greenhouse with heated propagation beds, ventilation and heating systems to be closely monitored and adjusted. The irrigation of nursery plants is by hand.

2.11 Protection is essential for some crops and polytunnels and greenhouse need ventilation control from dawn to dusk especially though the summer months. Polytunnel crops need irrigation and trickle systems need to be monitored and adjusted to meet the plants' specific requirements.

2.12 Many crops are susceptible to spring frosts and frequently 'fleece' covering are used to protect the most vulnerable plants. The majority of outdoor plants require intermittent irrigation to maintain plant health and reduce stress especially important in organic horticulture; crops and irrigation systems need constant monitoring for efficient and effective use of water.

2.13 Harvest of fruit and vegetables typically starts as dawn in summer months in order to minimise the 'field heat' in the crop, reduce refrigeration needs and crop deterioration. Seasonal workers who help with harvest need organisation and close supervision.

2.14 Fruit and vegetables need to be chilled immediately after harvest and transferred to cold store for short or long-term storage at the correct time and temperature. Top fruit crops will be in cold storage throughout the autumn and winter. Some of the soft fruit will be frozen on the day of harvest and moved to bulk freezers when the correct temperature is achieved. These processes need constant monitoring and personnel need to be available at all times. Cold stores, freezers and chillers need regular monitoring throughout the year and it is essential that personnel are on hand to deal promptly with any emergencies.

2.15 The holding includes a breeding pig herd of Oxford Sandy and Black pigs. This is a traditional English but endangered breed that is ideal for organic farming and a very important part of the holding's rotations and nutrient management. There will be six breeding sows producing about twelve litters a year. Although housed outdoors, the pigs will need feeding, inspection twice daily and assistance with farrowing.

2.16 In addition to these pigs, free-range chickens for egg production also provide some pest and weed management throughout the holding. Chickens require feeding and attention morning and evening and to be securely housed at night. The chicken flock will be introduced once the avian flu risk is reduced.

2.17 Messrs. Worsley and Hitchings attest to the fact that organic horticulture is very demanding of continuous manual inputs and skill, that the labour requirements of organic systems is always greater than in conventional counterparts and that there exists less margin for error to be successful. It is not enough that a crop survives – they must be given the best environment all the time and Mr. Hitchings considers that this is impossible if the owners are compelled to live off-site. The essential need for constant close supervision, protection and management of crops, livestock, ventilation and irrigation systems, seasonal labour and the cold storage procedures critical to the success of this enterprise is confirmed.

2.18 Mr. Worsley discounts reliance upon automatic and alarm systems because they will not warn and correct a malfunction; there is an essential need for a constant presence of a person on site (paragraph 13.9). Mr. Hitching considers reliance upon these automatic systems as being inappropriate. In any case, such systems become useless if there is a power failure or electrical fault. Mr. Hitchings also points to the need for the constant presence on-site of mechanical expertise for the carrying out of repairs and servicing.

2.19 Both Mr. Worsley and Mr. Hitchings see the continuing development of this holding renders it increasingly essential for security purposes that there is a constant on-site presence of the applicants. Paragraph 6, Annex A of PPS7 accepts that the protection of livestock from theft or injury is a material consideration although it is not, by itself, sufficient reason to justify a new dwelling.

2.20 Both Mr. Worsley and Mr. Hitchings state that the applicants must live on-site if they are to realise their business plan and continue to develop their holding. Therefore, there is a clear and essential functional need for the applicants to live on-site and that this need will increase as the holding develops.

(iii) Clear Evidence that the Proposed Enterprise Has Been Planned on a Sound Financial Basis.

2.21 Annex A of PPS7 refers to 'proposed' enterprise whereas the applicants submit this planning application some time after it has been established and they have achieved their initial business objectives.

2.22 The applicants have established their enterprise with great care marrying their business, marketing and horticultural experience with the advice of ADAS and the Organic Advisory Service. The holding qualifies for significant Organic conversion subsidies and Entry level system payments as well as the single farm payment.

2.23 The establishment of a wide range of fruit, vegetable and pork produce will minimise the reliance on any one crop and allow direct sales of a wider range of produce to limited local customer base at premium prices. Crops will attract a premium price once the holding becomes fully Organic next month. The increase in the supply of fruit and vegetables to local restaurants, small shops, farmers' markets and a box scheme better suits variations in supply more than if only larger customers were supplied. The wide range of crops balances capital and labour intensive enterprises with long- and short-term returns whilst using labour more effectively throughout the year avoiding significant peaks in a limited season.

2.24 Furthermore, small-scale processing (for example: juicing and freezing) uses prudently excess and grade-out crops extending the selling season and reducing waste. The applicants have identified a market opportunity for quality organic processed fruit for the speciality ice-cream, yoghurt and baby-food sectors where lower quality imported product presently dominates.

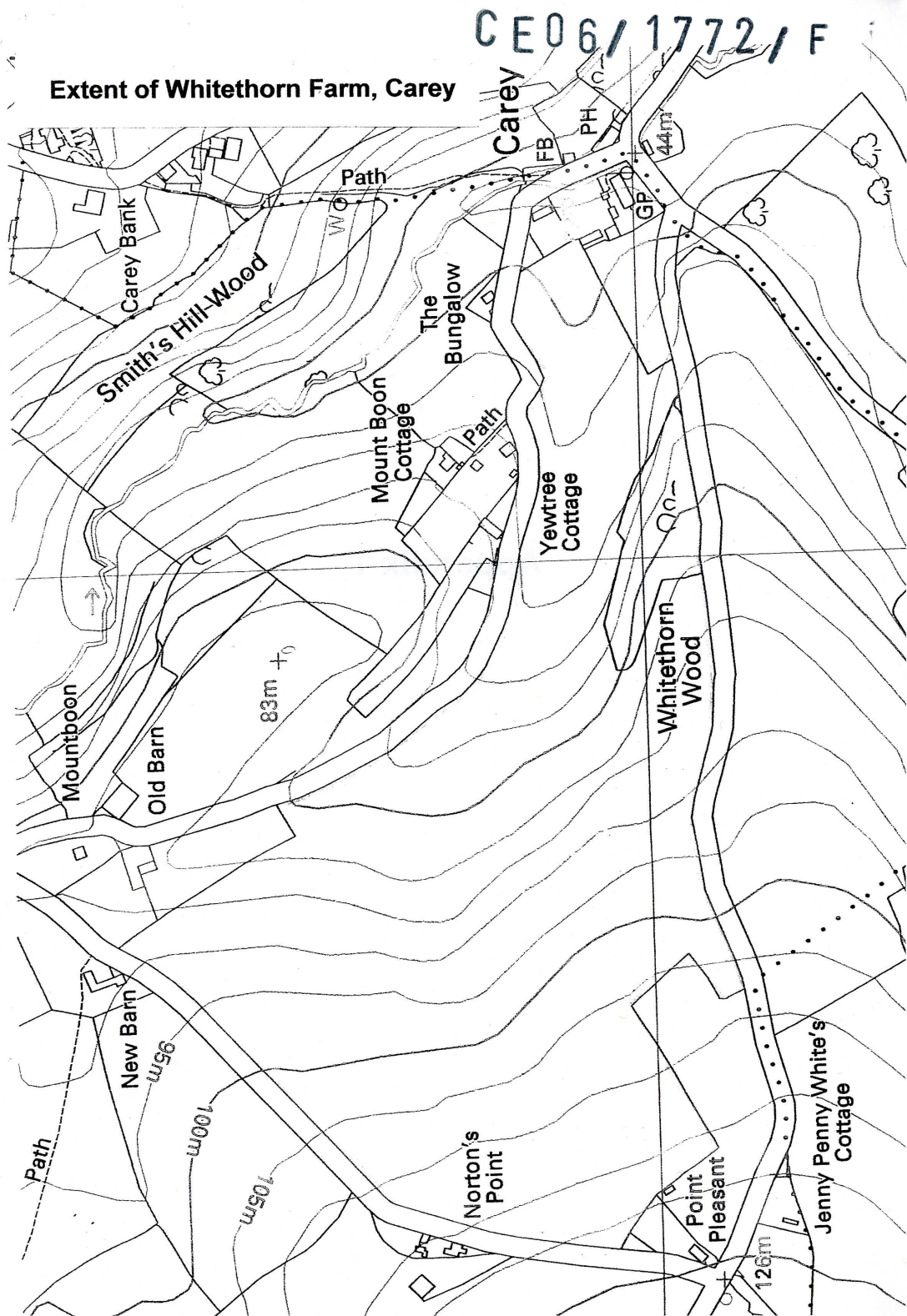
2.25 The applicants' business plan shows, *inter alia*, that the net profit of this enterprise will increase steadily from this year to the extent that within three years an income considerably greater than the minimum agricultural wage will be generated by this enterprise. Mr. Worsley has undertaken his own financial assessment which points to the same conclusion. Significantly, Mr. Hitchings' experience leads him to believe that the applicants' figures are, in some instances, on the conservative side.

2.26 Given this, I submit that the applicants have demonstrated that their enterprise has been planned on a sound financial basis and that the success of this holding achieved thus far attests to this fact.

2.27 In addition to this, the applicants place a significant emphasis upon environmental benefits including the restoration of the bio-diversity of their holding. This approach is entirely appropriate given that the holding lies in the Area of Outstanding Natural Beauty within which the primary objective is the protection and enhancement of its natural beauty. Significant lengths of hedgerow have been re-instated, the woodland has been improved and extended, large areas are left uncultivated and un-mown as wildlife habitats and the orchards have been planted in a more traditional manner to allow mixed grass and wildflowers to grow underneath.

2.28 In addition, the holding is conducting a DEFRA-funded project to evaluate green waste collections and it is part of the HDRA annual weed management programme.

2.29 Although the applicants' case is based primarily upon their ability to operate their enterprise at increasing levels of profitability and an ever-present functional need, it is worthy of note that weight is given to the management of attractive landscapes under paragraph 8 of Annex A, PPS7. Therefore, the



Appendix 1

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Horticultural Appraisal - Mr & Mrs Soble Whitethorn Farm

1 Introduction

1.1 Instructions

I have been instructed by Mr & Mrs Soble to write a report/appraisal regarding 18ha (44 acres) of land situated in the parish of Carey now known as Whitethorn Farm.

1.2 Qualifications and Experience

I, Keith Worsley, have spent my whole career in horticulture. I obtained my horticultural diploma in 1954 at Plumpton College, east Sussex. I spent ten years managing a nursery and fruit holding in Sussex. I obtained my NDH qualification and joined NAAS and until recently retiring, have been with MAAF advisory service (now ADAS) working in Sussex, Kent, East Anglia and West Country areas, moving to Herefordshire in 1980 as senior consultant in Fruit and Hops.

1.3 Background

I first met Mr & Mrs Soble in May 2003 when they requested advice and a report regarding establishing a horticultural enterprise on a parcel of land at Pencombe. Unfortunately they were unable to procure this land but continued looking for something suitable in Herefordshire.

2 18ha Parcel of Land, Carey

2.1 Description

Invited to visit the site in April 04. It is situated in a valley with a SE aspect toward the River Wye. It comprised approx 1ha of established woodland, that had been poorly managed, and 17ha (43 acres) of open land. This was bounded by an external hedge and almost wholly by roads. There were a number of horses grazing within electric fenced areas. There were 3 or 4 gated accesses to the roads around the external boundary. There were no buildings or permanent internal divisions. It was very obvious that all the internal hedges had been previously grubbed.

2.2 Geology

The whole area is of the Devonian Red Sandstone, mainly the Eardiston Series that can be described as a generally well-drained sandy soil. There are some areas of the Bromyard Series covering the higher parts, which is a heavier soil with more water retention. There were areas of 'cupped' sandstone, which indicated a possible source of underground reservoirs of water.

3 Horticultural Potential

The whole area is classified grade 1, with perhaps some reservation on the steeper slopes with regard to soil erosion, facing SE, the very low areas a frost risk, and for all horticultural needs, a good source of water. In conclusion the whole holding has an extremely good horticultural potential - the higher areas for top fruit production with the remaining area capable of sustaining any form of intensive horticultural cropping.

4 Purchase

After lengthy negotiations the land was purchased 'freehold' in September 2004 and named Whitethorn Farm. This, unfortunately, was too late to purchase a lot of the planting stock required for that winter planting season, but orders were placed for the future needs.

5 Development Plans

5.1 The whole unit to be run on Organic principles

5.2 The 17ha was subdivided into smaller areas taking into account the site, soil, aspect, and management needs. Thus the top fruits to occupy the higher areas of land creating cider, dessert, culinary, pear, plum and cherry orchards along with the necessary windbreaks and alleyways totalling 7ha. Below this are the areas of soft fruits, raspberries, blackberries, jostaberries, blackcurrants, redcurrants, gooseberries and strawberries totalling 1.5ha. Asparagus, Rhubarb and vegetable areas total approx 2ha. Protected cropping with multiple cropping equals approx 0.1ha. The remaining unplanted areas will be incorporated within the rotational needs of the strawberries and vegetable areas.

5.3 Bore hole

Water engineers were engaged to drill for water and successfully installed a borehole capable of producing 4m³/h. A storage tank installed at the highest point of the holding along with water mains and trickle irrigation to the respective crops.

5.4 Buildings

A horticultural building 22.8mx12mx5.2m (75'x40'x17') to eaves has been erected below the wood constructed of steel, block work and sympathetically clad in wood with a fibre cement roof. This will be used to house a cold store, freezing and refrigeration machinery, pack house equipment etc.

A 'Pole barn' 12mx7mx4m (40'x23'x13') is to be erected to store machinery and equipment, bulk bins, straw etc.

5.5 Propagation

A greenhouse of 9mx6m (30'x20') is to be constructed to replace a temporary polytunnel for propagating plants for polytunnel production and outside vegetable production.

5.6 Foreign Students

A temporary mobile caravan has been acquired for student use - providing accommodation is a pre-requisite for both 'Concordia' and 'HOPS' organisations.

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13.8 During harvest the cool chain requirement for crops needs supervision for 24 hours a day 7 days a week. For example fruits such as strawberries and raspberries need to be picked and within 30 minutes of picking the latent heat has to be extracted. Fruit is then check weighed in punnets and placed in a holding cold store with high humidity and a temperature maintained at +/- 4°C until despatched.

13.9 There are many automatic aids and alarm systems. There is no equipment that will warn and correct a malfunction other than the presence of a human being at all times.

13.10 The pigs are enclosed by an electric fence that is portable to enable easy movement to fresh sites. However, it needs constantly checking to ensure there is no short circuit or the animals get out.

13.11 The free range chickens need shutting in their house securely at dusk and ideally opening at dawn to avoid being killed by foxes

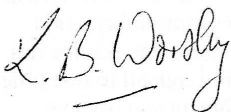
13.12 The holding is still being developed but will become more and more liable to intruders and theft, therefore, warranting an on-site presence at all times.

14 Conclusion

Mr & Mrs Soble wish to establish practical organic methods of production and to this end have made substantial investments on this 17ha holding, and will be making a lot more, indicating a sound and complete commitment to the organic system of production.

The owners have the required skills, resourcefulness and determination to make a success of the business, but need to be on-site all the time to succeed. The horticultural enterprise is being set up on sound financial footings, which will need to continue, as the organic systems need more time to bring good economic returns (compared to the conventional) in-organic systems.

Whitethorn farm has been successfully created so far from a bare piece of land. It now needs the provision of some essential on-site temporary accommodation to ensure the newly created unit can develop further successfully in the future.



Keith Worsley

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The Organic Advisory Service farm report for:

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Introduction & Objectives

This report has been prepared with the purpose of producing an agricultural evaluation to support a planning permission application for a temporary agricultural residence in the first instance. The report will review the potential productivity of the holding and the financial appraisals that have been produced. Arguments will be introduced to demonstrate the desirability and in some cases the need for a permanent on-site presence. The latter will take into account the functional need requirement as outlined in PPS7.

Before going further I should introduce myself. I am presently Head of Advisory services at Elm Farm Research Centre and I am responsible for the Organic Conversion Information Scheme (OCIS), a government contract that we have held for over 9 years. The service has delivered over 7,000 free on-farm visits to a wide range of producers in England in that time. I visited the site on two occasions and provided advice on the establishment and organic conversion. I have been in touch throughout the process and I have followed progress with interest. I have been actively involved in organic horticultural advisory and consultancy work for 8 years and before that I was a registered organic producer myself growing a wide range of vegetable and salad crops for a range of outlets including supermarkets, organic wholesalers and local markets.

In terms of further background I am a member of the Advisory Committee of Organic Standards (ACOS) and I also chair its Technical Committee. I sit on both the Horticulture Strategy Group and Organic Horticulture Sub-group in Wales, and I also serve on the Horticulture Standards Committee of the Soil Association. I am directly involved in a number of Defra-funded projects covering a range of topics that includes technical aspects of organic growing, the market for organic produce and the role of imports in the UK organic market.

It is worth remembering that there is a policy context that relates to organic production. The Curry Report deals with issues of local production and marketing, organic production and its environmental benefits, and healthy eating. All of these are considered to be very positive outcomes and worthy of encouragement at all levels. The English Organic Action Plan takes these themes further and also sets out a target of doubling the proportion of UK produced organic food. As noted Government policy sets out to encourage organic production through the provision of free conversion advice, the setting up of bodies as described and through the provision of financial support under the now closed Organic Farming Scheme and the recently opened Organic Entry Level Scheme. Demonstrated benefits of organic production include increased biodiversity on organic farms, reduced consumption of external inputs, and increased employment with consequent implications for local economies.

The Farm

The details of the farm are set out in other documents and I will only note here the fact that I consider that this is a very substantial enterprise backed by considerable investment. It is also worth noting that significant steps have been taken to restore habitat and bio-diversity to the holding. While I am in general agreement with the financial figures that have been prepared though I do feel that in some instances they are on the conservative side. I am quite prepared to carry out my own analysis to back this statement up if this would be seen as helpful.

Report

Security

Regrettably security has to be near the top of the list as thefts from rural properties both commercial and domestic has increased dramatically in recent years. It is not possible at the present time to effectively deter unauthorised entry and monitor the site. Theft and vandalism can both contribute to financial losses even where insurance cover exists but more importantly the loss of key items of equipment at critical times of the year could be disastrous. The proposed dwelling would be ideally placed to monitor the farm entrance and provide a deterrent through the obvious presence of people.

Fruit production

Some of these comments will also apply to the annual crops.

- The presence of mechanical expertise on-site on a 24-hour per day basis can also be crucial for the efficient running of the farm. At busy times of the year the carrying out of

repairs and servicing during the hours of darkness could be critical to optimum timing of operations.

- Labour requirements in top fruit production are very seasonal but are extreme during the harvesting period. It can in effect mean the use of every hour of daylight and also requires a rapid response to changing weather conditions. Once again an on-site presence is essential to the efficient running of the business.
- A number of operations can require very early starts and many hours of continuous work on-site. This can include harvesting, the application of inputs, the selling of the crops, the processing of surpluses and many other operations.
- Other duties that will need to be carried out on a round the clock basis include the monitoring of the cold store parameters (and adjustments where necessary) along with the monitoring of pest levels in the orchards. Pests can be very small such as aphids, slightly bigger such as codling moth, quite large such as rabbits or very large such as deer. All cause damage in their various ways and appropriate action taken if this becomes economically unsustainable. Once again a case can be made for the monitoring of the site on a round the clock basis and the on-site presence of two full-time partners will make this possible.
- The labour requirements in organic systems are always higher than in the non-organic counterpart enterprises. The management of the labour demands is just as important as the management of the trees and the environment in which they sit. In my view this is a very important development that seeks to address current market and policy needs. It is therefore important that the workloads are distributed fairly and evenly.

Protected cropping management

In my opinion this is a very important reason why there needs to be a constant on-site presence. By its nature protected cropping seeks to maintain an ideal growing environment for the crop and this involves controlling temperature, humidity, ventilation and water supply. These can be controlled through the use of automatic systems but these would be inappropriate in this situation. In any event such systems can become useless if there is a power cut or electrical fault. Faults can lead to crop damage where an irrigation system stays on beyond its allotted time, vents stay closed in hot weather or open in the night, etc.

It is relatively straightforward to maintain an optimum environment in reasonably constant weather conditions but the real problems arise when there is a sudden change. Temperature rises of 15-20°C are not uncommon where overcast skies clear to give full sun – this is a situation where prompt action is essential to prevent damage to the crops. Sudden strong winds can cause damage to plants where the end doors are fully open for ventilation purposes and in extreme conditions can cause damage to the tunnels themselves. Problems occurring in the day are likely to be dealt with promptly when people are working there. It is the problems that can (and do) occur in the night that can give the greatest concern.

A considerable number of transplants will be raised on-site – small seedlings and transplants grown in module trays are much more sensitive to changes because they are generally less robust and because they are grown in a relatively small amount of compost. If the trays dry out unexpectedly then the young plants die – this can happen in a matter of hours. More seeds can be sown but the cropping plan will have been disrupted – seedlings that are stressed in their early stages of growth will not grow to their potential full size or productivity.

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Calabrese is one example where the plants head too early because of temperature stress while lettuce seeds refuse to germinate in conditions that are too hot. At the opposite end of the temperature spectrum damage will be caused by night-time frosts if they are unpredicted or precautions not taken.

In order to achieve the productivity on which the financial figures are based monitoring and adjustments need to be frequently carried out – this should involve several checks during every day and at least one every night. It is not enough that plants survive – they must be given the best environment all the time and I believe this would be impossible if the owners were required to live off-site.

Livestock issues

A high level of animal welfare is the norm for all UK production systems but it is subject to particular emphasis in organic systems. All organic livestock producers must not only comply with the guidelines set out by the Farm Animal Welfare Council (FAWC) but also with any particular provisions within the standards of their organic Certifying Body (CB). It is possible to manage a livestock operation from off site but there are a number of reasons why this would be unacceptable in this particular case.

- At the present time there is a single strand to the livestock (pigs) but this will change when the laying hen enterprise is initiated. The complexity of the livestock operation and the business as a whole is set to increase over time, a situation that can only realistically be managed by a 24-hour presence on-site.
- Specific welfare issues are to some extent unpredictable such as illness, parasite infestation (internal and external), and delivery difficulties. Other problems include stock especially young stock getting trapped or otherwise caught up in physical situations, escapes from the holding, entry of other stock and the risk of disease transfer e.g. scab in sheep, predation and the consequent risk of injured animals, etc., etc. Many of these issues could be addressed by the housing of stock on a more or less permanent basis but this is completely unacceptable on an organic holding. Livestock can be housed for a maximum of one third of their life and only where prevailing conditions require it i.e. in the depths of winter.
- Other issues are more predictable but they still need close management and attention to detail. These include the provision of food and water, security of housing where provided (e.g. poultry), security and safety of fencing, regular inspections seven days per week (implicit in the UK Organic Standards and explicit in the Soil Association Standards), treatment of health problems according to the standards, etc.
- Any such problems that arise during the normal working day can of course be dealt with because there should be people on site but, as was noted for the management of protected cropping, it is the problems that arise 'out of hours' that give rise to the greatest concern. Welfare problems of all types do not respect the working day and in some cases such as predation are likely to be worse at night. My opinion is that welfare of the existing and proposed livestock can only be maintained at the required level by a permanent presence on-site of the person with primary responsibility for the animals.

Actions & Conclusion

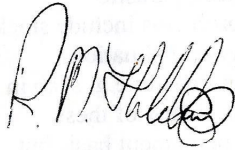
Actions & Conclusion

1. This is a business enterprise that has considerable potential for a strong degree of viability.
2. The commitment to all aspects of the business by the owners is clear and undeniable.
3. Such business developments are consistent with Government policy and can only have positive benefits for the locality and its environment. These include increased employment, the local production of food with few food miles and increased biodiversity.
4. I have set out a number of reasons why I believe a round the clock on-site presence is essential but not all will necessarily pass the functional test as required under PPS7 on their own merit.
5. That said I believe that the management of a diverse range of field crops and the complexities of the protected cropping operation does satisfy the requirements of the functional test.
6. I also consider that the existing livestock operation satisfies the requirements and this is set to become more complex as the business matures.

07 May 2006

DISCLAIMER:

In undertaking this work, *The Organic Advisory Service* has based its advice on the figures and information provided by the client or its representatives, the responsibility for which rests with the Client. *The Organic Advisory Service* has taken reasonable steps to ensure that the advice offered is accurate and applicable to the client's circumstances. No liability shall lie with *The Organic Advisory Service* in respect of any disclosure made of this advice and acceptance of this advice shall constitute an indemnity from the client to *The Organic Advisory Service*. It should be noted that the client is responsible for contacting where appropriate any relevant Government departments (e.g. DEFRA [MAFF] and the Intervention Board) to ensure that its individual situation in respect of points of law or procedure is ascertained and it is advisable that written replies are obtained to all queries.



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