Supporting Statement

A Rural Worker Dwelling

On land at

Manley Hall Farm, Erbistock, Wrexham, LL13 0DH
On behalf of

SR Lewis

September 2025

RTPI mediation of space · making of place RIBA RICS

BERRYS

T: 01432 809830 | E: hereford@berrys.uk.com | berrys.uk.com

APPLICANTS DETAILS
SR Lewis

PRODUCED AND ISSUED BY
Vicky Price MRICS FAAV
Chartered Surveyor and Business Consultant

APPROVED BY
Amy Henson
BA (Hons)
Senior Planning Consultant

PROJECT
Rural worker dwelling on land at Manley Hall Farm, Erbistock, LL13 0DH

BERRYS

Shiretown House
41-43 Broad Street
Hereford
HR4 9AR
01432 809 835
berrys.uk.com

Contents

1. Qualifications and Experience....4
2. Introduction....5
3. Background Information....6
4. Appraisal of Planning Policy....11
5. Labour Requirement....15
6. The Functional Need....18
7. Animal Welfare Regulations....25
8. Financial Need....27
9. Other Accommodation....28
10. Conclusion....30
11. Appendices....31
Appendix 1 - Site Plans....32

1. Qualifications and Experience

This report is prepared by Vicky Price of Berrys, who is a rural business consultant, with over 12 years of experience in the industry.

Vicky Price is a Member of the Royal Institution of Chartered Surveyors and a Fellow of the Association of Agricultural Valuers.

Vicky acts on behalf of a range of clients in the agricultural and rural sectors having produced agricultural appraisals to support planning applications for farm worker dwellings across Denbighshire, Powys, Shropshire, Herefordshire and other counties. Additional work involves acting on behalf of clients in a wide range of planning matters, farm management consultancy, landlord and tenant negotiation, valuation, rural subsidy and grant matters and professional practice.

2. Introduction

This report has been commissioned by SR Lewis in connection with a full planning application for a farm worker dwelling at Manley Hall Farm, Erbistock, Wrexham, LL13 0DH.

The purpose of the report is to provide an objective evaluation of the existing agricultural business operated by the applicant. Consideration has also been given to the business plans in place for the development of the current farming enterprises. Assessment has been made of the labour requirements for the existing farming enterprises undertaken.

This report is prepared in accordance with Planning Policy Wales (PPW). PPW is supplemented by a series of Technical Advice Notes (TANs), in particular to the proposed development is TAN 6 – Planning for Sustainable Rural Communities applies.

The report also considers wider statutory requirements under the Health and Safety at Work Act 1974 and animal welfare legislation authorised under the Agriculture (Miscellaneous Provisions) Act 1968 and the Animal Welfare Act 2006.

This report is prepared as part of the planning application and is based upon information provided by SR Lewis. This appraisal justifies the requirement for a permanent agricultural worker dwelling on the farm to be able to successfully continue running the business, whilst also enabling future development.

This document should be read with the accompanying application forms, Planning, Design and Access Statement and plans submitted with the application.

3. Background Information

3.1 Business Structure and Background

SR Lewis is a family operated farming business, trading as a partnership, which comprises [redacted]
All partners are actively involved within the running of the business, with the day to day operations undertaken by [redacted] and [redacted]. [redacted] is involved within the administration of the business as well as decision making.

SR Lewis is a successful and well-run farming business, which operates a dairy enterprise, alongside the rearing of calves, beef cattle and sheep. The agricultural land is used for grazing, forage and arable crop production.

The business has expanded over the years to include calf and youngstock rearing to fat cattle. Concerns over bringing unknown animals into the dairy and beef herds and onto the farm holdings is a major reason why the business breeds and rear their own calves, rather than rely on brought in stock. The financial implication to the business on having Tuberculosis accidently brought into the herd is significant. As such, SR Lewis is now at the stage where a bio secure unit is required for the calf rearing on a separate holding to the dairy and finish cattle herds.

The land at Manley Hall Farm has been identified as being suitable to enable the future expansion of the calf rearing enterprise. However, to ensure the safe operation of the unit, a permanent farm worker dwelling is required on the holding.

3.2 Farm Holdings

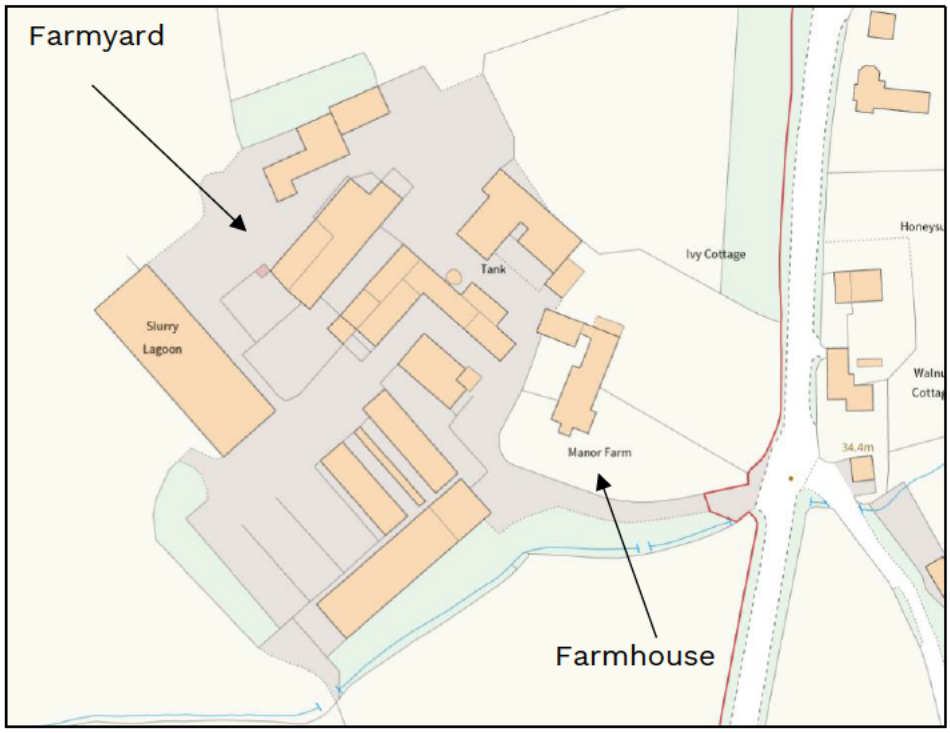
Over the years, the partners have progressively built up the farming business, including investing in machinery and equipment along with increasing livestock numbers and more recently the purchase of Manley Hall Farm in 2008, which the business had been farming on a tenancy agreement for 15 years prior. The purchase of this farm provides a secure holding as part of developing the business, rather than relying on tenanted property.

To date the farming business is now operated over a number of holdings and extends to circa 505 acres in total, with the main base at Manor Farm, Eyton. This farm is occupied on a long term Agricultural Tenancy Agreement.

Manor Farm extends to approximately 145 acres in total and comprises mainly of temporary and permanent pasture, utilised for grazing and forage crop production.

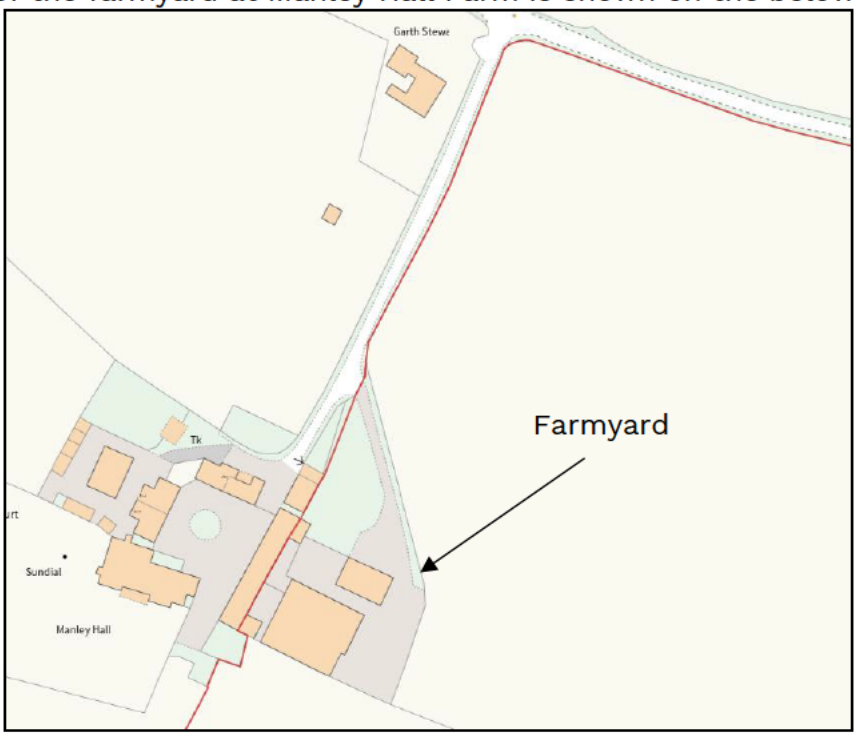
The farmyard at Manor Farm includes a range of modern and traditional farm buildings, which are all fully utilised for livestock housing, the dairy parlour and associated operations along with storage for forage, feed, straw and machinery.

The extent of the farmyard forming part of Manor Farm is shown on the below extract plan;



Manley Hall Farm extends to approximately 35.56 acres located within a ring fence and includes a range of farm buildings suitable for the calf rearing enterprise. There is additional land occupied at Erbistock which extends to approximately 167 acres, including Manley Hall Farm. The land is currently utilised for arable crop production, with the long term aim to grass the fields down as part of rearing calves on the holding.

The extent of the farmyard at Manley Hall Farm is shown on the below extract:



The business occupies a further 120 acres at Erlas Hall Farm, near Wrexham on a long term tenancy basis. This is mainly permanent pasture and temporary grassland occupied by the sheep enterprise and for the Longhorn beef cattle enterprise. The business rents an additional 73 acres of land on a yearly basis at Bangor-on-Dee, Cross Lanes and Erbistock.

Maps showing the three holdings and associated farmland are included within Appendix 1.

3.3 Enterprises on the Farms

The agricultural business is based on the following enterprises:

- The dairy cattle herd currently comprises 160 head of milking cows which are split between spring (40% of herd) and autumn (60% of herd) for calving. There are 2 stock bulls which run alongside the dairy herd.

- There are over 150 calves reared annually by the business, which are mainly reared all the way through to fat cattle stage. A number are reared annually on the farm for retaining as dairy herd replacements.

- There are currently 25 head of finished fat cattle on the holding in addition to the calves.

- There is a 150 head breeding ewe flock along with their offspring and two rams. The lambs are reared and sold as fat.

- There is a small pedigree herd of Longhorn which are kept separate to the commercial fat cattle. This herd comprises 9 breeding cows, all with calves at foot. Their offspring are reared as grassfed fat cattle for sale through the local farm shop.

- The arable enterprises include the growing of forage crop production, including maize and grass for silage, along with cereals such as barley, for home grown feed.

The existing agricultural business is established and well-run, with business plans in place to expand the current farming activities to ensure the continued development of a viable and sustainable farming business.

The dairy herd is producing milk under contract to Meadow, with the herd split between spring and autumn calving to ensure a year round supply. The business utilises two stock bulls along with specialist artificial insemination for all dairy replacements and as part of producing good quality beef cattle. The herd is crossed with Aberdeen Angus and Limousin to ensure a high standard of finish in the beef cattle.

Due to biosecurity and historic issues with Tuberculosis (TB), alongside the business' commitment to produce homegrown beef cattle to a high standard, it is becoming increasingly important to create an isolation unit. As such the purchase

of Manley Hall Farm will enable the business to create a separate facility for the rearing of the calves. This will result in all newborn calves being taken to Manley Hall Farm for rearing in batches within the existing livestock buildings.

This decision then allows the buildings at Manor Farm, which are at capacity, to be utilised by the existing dairy herd and finished fat cattle enterprise.

The sheep enterprise currently includes 150 breeding ewes, along with two rams and circa 270 head of lambs per annum. Lambing takes place mainly over February to April but can be extended due to timings and weather conditions. Annually, ewe lambs are retained on the holding as part of growing the breeding flock and for replacements. The remaining offspring are reared on the holding for finishing.

There is a separate herd of nine pedigree Longhorn cattle, with calves at foot. These calves are kept separate from the commercial herd and are reared and finished on a grass based system for sale into the local farm shop.

The cattle and sheep are all reared in a welfare friendly and stress-free environment and are fed on predominately home-grown grass and forage to produce the very best quality animal. The commercial fat cattle are finished on a mix of forage, rations and homegrown cereals.

The development of the calf rearing enterprise will allow SR Lewis to respond more effectively to fluctuations in the commodity and livestock markets. Flexibility is vital in ensuring the longevity of the farming business, allowing it to remain viable in the future.

3.4 Existing Houses

There are no existing dwellings forming part of Manley Hall Farm holding.

The farmhouse at Manor Farm is occupied by [redacted]. This property forms part of the tenancy agreement at Manor Farm and is only sufficient for one family to reside within. Manor Farm is located approximately 3 miles (circa 10 minutes) away from Manley Hall Farm.

[redacted] The property is not available in the long term for occupation. This property is located approximately 5 miles (circa 15 minutes) away from Manley Hall Farm.

[redacted] Groves Meadow, Erbistock. This property is owned and occupied [redacted]

As there is a requirement to create a separate isolation unit for the calf rearing enterprise at Manley Hall Farm, there is a need for the business to have a farm worker dwelling located on site for [redacted] to manage the enterprise. Manley Hall Farm has been selected as it has the existing infrastructure in place to accommodate the rearing of the calves.

The demands on the farming business require both [redacted] and [redacted] to be available and residing on the farm holdings fulltime as part of the successful operation of both the dairy herd at Manor Farm and calve rearing enterprise at Manley Hall Farm.

4. Appraisal of Planning Policy

4.1 National Planning Policy

For the purposes of this appraisal this statement concentrates on the requirements of the Planning Policy Wales (PPW), Edition 12 which was published in February 2024 and sets out the land use planning polices of the Welsh Government.

The planning system of PPW is committed to achieving sustainable development in Wales. PPW provides the legislative and policy framework to manage the use and development of land in the public interest in a way which is consistent with key sustainability principles and key policy objectives. Sustainable development proposals that accord with the relevant local development plan should be approved without delay.

Specifically, PPW states: "*The purpose of 'rural enterprise dwellings' is to enable rural enterprise workers to live at or close to their place of work, including encouraging younger people to manage farm businesses and supporting the diversification of established farms. Rural enterprise dwellings represent one of the few circumstances in which isolated new residential development in the open countryside may be justified.*"

PPW is supplemented by a series of Technical Advice Notes (TANs), in particular to the proposed development is TAN 6 - Planning for Sustainable Rural Communities applies.

4.2 TAN 6 - Planning for Sustainable Rural Communities

The purpose of TAN 6 is to provide practical guidance on the role of the planning system in supporting the delivery of sustainable rural communities and in particular rural economies, rural housing and services along with sustainable agriculture.

TAN 6 states that the planning authorities should support the diversification of the rural economy as a way to provide local employment opportunities, increase local economic prosperity and minimise the need to travel for employment.

Section 4.3 of TAN 6 - Rural Enterprise Dwellings states that one of the few circumstances in which new isolated residential development in the open countryside may be justified is when accommodation is required to enable rural enterprise workers to live at, or close to, their place of work. In particular, the policy supports new dwellings on an established rural enterprise and where a new dwelling on a new rural enterprise is required.

The proposed development is for a new rural worker dwelling in connection with an existing enterprise to be located at Manley Hall Farm. The dwelling will enable [redacted], to take over the management of the farm holding at Manor Farm, whilst [redacted] is responsible for the calf rearing enterprise at Manley Hall Farm.

There are four circumstances identified within the policy which relate to the provision of a new rural enterprise dwelling. These are:

- to meet the needs of established rural enterprises (including farms) where there is a functional need and a requirement for a full-time worker together with a prospect of long-term business financial sustainability.
- to enable the transfer of control of farm enterprises to the next generation (second or further dwelling on a farm only).
- to meet the needs of additional workers on established farms where there is a functional need, and a requirement for an additional 0.5 or more of a full-time worker earning at least 50% of a farmworker's salary (second or further dwelling on a farm only).
- to meet the needs of new rural enterprises where there is a functional need and a requirement for a full-time worker.

TAN 6 states that support for new dwellings will be given if the following criteria are satisfied:

4.2.1 Clear evidence of a firm intention and ability to develop the rural enterprise concerned

SR Lewis already operates an established family farming business, which comprises a successful dairy herd, along with calf rearing, beef cattle, sheep and arable enterprises.

There are clear business plans in place for the creation of a separate bio secure isolation holding for the rearing of the calves and youngstock at Manley Hall Farm. Currently the buildings at Manor Farm, which is a rented holding, are at capacity and accordingly moving the calf rearing to Manley Hall Farm will create additional space for the finished beef cattle.

Manley Hall Farm has buildings which are suitable for the rearing of the calves and youngstock. There are no other buildings owned or available to the business for this purpose.

The planned separation of the youngstock from the milking cows and finished fat cattle will allow the existing business to be more resilient within the market whilst meeting biosecurity requirements.

4.2.2 A clearly established functional need and that need relates to a full-time worker

Full details of the labour requirements associated with the current farming enterprises and the proposed development are detailed within section 5 below.

As detailed within section 6 below there is a clear functional need for a full time farm worker to manage and run the day to day activities associated with the calf rearing enterprise at Manley Hall Farm.

The farming business requires [redacted] to remain in the farmhouse at Manor Farm in order to continue managing the dairy unit and fat cattle herd. [redacted] will take over the management of the separate calf rearing enterprise at Manley Hall Farm.

The functional need considers all unexpected situations that could arise from the rearing of the calves and youngstock. This, along with the standard requirements for the management and operation of the livestock enterprises, require both [redacted] to be available 24 hours a day, seven days a week, which is outside of normal working hours. If either [redacted] cannot be on site at the respective holdings to meet these requirements then the viability and existence of the farming business would be threatened.

4.2.3 Clear evidence of intention and evidence the business has been planned on a sound financial basis

SR Lewis operate an established business, which has been developed and expanded over the years to ensure that it remains flexible and financially sound. There are clear business plans in place for the continued development of the business in the future.

The business accounts have been analysed for the last three years, which further support the financial justification for the necessary permanent worker dwelling on site. Further details are set out in section 8 below.

The proposed development allows the farming business to be more resilient to the expected fluctuations in the agricultural markets. Resilience is vital in ensuring the longevity of the farming business and, as such, the planning application for the dwelling should be supported.

4.2.4 Whether Other Accommodation can fulfil the Functional Need

There are no other existing dwellings at Manley Hall Farm or any other existing accommodation in the area which is suitable and available for occupation by [redacted] as part of operating the calf rearing enterprise.

This proposal is supported by Planning Policy Wales, which enables [redacted] to reside on the holding as part of succession and business planning. This decision enables [redacted] who is already a partner within the business, to reside at Manor Farm alongside [redacted] who is required to provide the essential management of Manley Hall Farm.

A comprehensive search of the residential market has been undertaken, for both properties to purchase and those to rent. There are no properties to either rent or purchase within the immediate surrounding area.

It has been established within this report, specifically within section 6 below, that the functional need requires the presence of [redacted] to reside adjacent to the livestock at all times, especially as part of rearing the

calves and youngstock. Therefore, the business requires a dwelling on the holding.

The functional need requires both [redacted] to live within sight, sound, and smell of the livestock. There is no other property available in close proximity to Manley Hall Farm which could fulfil this need. It would not be possible to fulfil the functional need when living outside of the range of sight and sound and therefore no other dwellings in the area would be suitable. Accordingly, the functional need cannot be fulfilled by another dwelling on the holding or within the area.

In consideration of the information provided above, it is our professional view that the proposed rural worker dwelling complies fully with the policies contained in TAN 6.

4.3 Wrexham Unitary Development Plan

At a local level, planning policy is set out within the Wrexham County Borough Local Development Plan, which was adopted in December 2023. Specifically, their Policy H7 - Housing in the countryside, supports proposals for housing development outside a defined settlement if it is for the purposes of agriculture, forestry or other rural enterprise as defined in TAN 6.

The proposed development will achieve minimum sustainable building standards, as set out within the supporting Planning, Design and Access Statement as part of the full planning application.

It is considered to be appropriate in scale and its setting is also considered to be acceptable.

It is suggested that the proposal represents a positive direct contribution to agricultural employment but more significantly represents a much larger means of supporting other local businesses and its employees. Implementation of the proposed development would represent a significant financial investment, a large proportion of which is likely to support local suppliers and contractors etc. The operation of the farm also supports other local suppliers. This support to the local economy helps businesses, whilst safeguarding and creating jobs.

5. Labour Requirement

The overall management of the business is undertaken equally by [redacted] and with administrative support by [redacted]. [redacted] and [redacted] are jointly responsible for the day to day running of the business.

One relief milker is employed by the business to help twice a week. There are no additional full or part time workers on the holding.

The requirement to separate the calves and youngstock from the milking herd and fat cattle housed for finishing, has led to [redacted] taking over the management of the calf enterprise. [redacted] will continue to reside at Manor Farm as part of managing that dairy holding.

The standard labour associated with operating and managing the existing farming enterprises include the following;

5.1 Dairy Cattle Milking Herd

- Twice daily milking of the dairy herd, including collecting the cows, preparation of the parlour, milking the cows and returning the cattle to the buildings.
- Daily monitoring of all cows on an individual basis, including the health and condition of each cow.
- Daily feed of the herd, including monitoring feed intake.
- Applying fresh bedding daily to housed livestock.
- Washing down of the parlour after each milking and cleaning the buildings, including passageways daily.
- Management of the breeding herd prior and during pregnancy, including AI, ultrasounds scans and additional management time.
- Monitoring and maintenance of the milking parlour equipment, milk tanks and other infrastructure and equipment.
- Organising milk collections.
- Foot trimming and TB testing of the cattle.
- Disease management, e.g. vaccinating.
- Record Keeping.

5.2 Dairy Calf and Youngstock Herd

- Batch calving throughout the year.
- Assisting in the calving of the cows and providing a secure building during calving.
- Ensuring the calves receive colostrum immediately after birth.
- Weaning of the calves from cows to prevent disease transmission.
- Hand feeding the calves with milk from birth to 10 weeks of age before weaning onto solid feed. Milk feeding takes place at least two times a day.
- Once weaned, providing specialist feed rations twice a day and ensuring access to hay and silage daily.
- Monitoring the health of the calves and youngstock, including vaccinating.

- Dehorning the calves during the first week of age and ear tagging.
- Foot trimming of youngstock and disease management when required.

5.3 Fat Cattle Finishing Herd and Sucker Cattle Herd

- Daily monitoring of the cattle.
- Rearing of the fat cattle for finishing until 30 months of age.
- Daily feeding of livestock.
- Rearing replacement stock, including for the dairy unit.
- Disease management, e.g. vaccinating livestock.
- Loading and unloading stock and moving around the holdings.
- Organising the sale and collection of the finished cattle on an individual basis.
- Calving of the suckler cattle herd and rearing of the offspring, as per the activities undertaken by the dairy youngstock herd.

5.4 Sheep Flock

- Monitoring of the sheep daily.
- Feeding of the sheep and moving to fresh grass on a weekly basis.
- Mating of the ewes with the rams.
- Management of the breeding flock prior and during pregnancy, including ultrasound scans and additional management time required.
- Ear tagging the lambs.
- Changing and cleaning the feed and water systems daily.
- Applying fresh bedding daily.
- Rearing of lambs.
- Disease management, e.g., vaccinating livestock.
- Loading and unloading of stock and movement around the holding.

5.5 Grassland and Arable Operations

- Management of grassland for grazing and forage crop production.
- Arable crop production and management.
- General farm work including cultivations, cutting, baling and silage production along with cereal crop harvesting.
- Record keeping.
- Maintenance.

5.6 Standard Man Day Calculations

The labour requirement for the proposed development is as set out above and detailed further in section 6 Functional Need below. The standard labour requirements have been calculated using the Standard Man Days (SMD) Calculation from the Agricultural Budget and Costings Book and John Nix book. A breakdown of this calculation can be seen in Table 1.

The ABC Book and John Nix states that the labour unit of one person is assumed to work 2,200 hours per year, with the total hours then converted into 275 notional ‘Standard Man Days of 8 hours. An additional 20% has been traditionally added to the calculation to consider for general maintenance, repairs and management. The

total SMD requirements is then divided by 275 to find the number of full-time employees that will be required.

The SMD requirements for the current farming enterprises, based on an average year, are as follows;

Table 1 – SMD Requirements for Current Farming Enterprises

Livestock	Quantity	Standard Man Days	Total
Cattle	160	4.00	640.00
Young weaned calves per half year	60	2.63	157.80
Weaned calves per half year	100	1.20	120.00
Other Cattle – fat finished cattle	25	2.00	50.00
Suckler herd	9	2.25	20.25
Suckler herd calves	9	2.63	23.67
Bulls	2	3.50	7.00
Breeding Ewes	150	0.50	75.00
Rams	2	0.50	1.00
Finished Fat lambs and replacement ewe lambs	270	0.50	135.00
Grazing and Management of Grassland	93 hectares	1.60	148.80
Arable crop production	30 hectares	2.40	72.00
General Maintenance of 15%			290.10
Total			**1740.62**

The above table, shows the SMD requirements for the current farming enterprises, based on an average year. The business has sufficient work and a functional requirement for over six full time workers.

The keeping and rearing of the calf enterprise means the management burden is increased further. Additional tasks in relation to the management of the offspring and youngstock are over and above standard livestock labour requirements. As such, [redacted] will be required to be on the youngstock unit 24 hours a day, seven days a week.

6. The Functional Need

"A functional need exists where vital processes require essential care at short notice".

The primary contribution to the functional need for on-farm residential accommodation is related to the management and daily running of the livestock enterprises at Manley Hall Farm. Livestock require a high level of care and attention to detail, not only in the day-to-day maintenance and feeding but simply in observation and ensuring each animal is healthy.

There is a constant and demanding need for both [redacted] to be located at Manor Farm with the milking herd and finishing cattle unit, along with [redacted] managing the calf rearing and youngstock unit, 7 days a week and 24 hours a day.

These functional needs are outlined below:

The dairy cows are milked twice a day at Manor Farm, with milking taking place throughout the year. The milking process starts at 6am, with the cows brought into the parlour for milking within groups. The process takes approximately 3.5 hours from start to finish. The second milking session takes place from 4pm in the afternoon.

While the cows are being milked, they are also checked over to make sure each cow is in a healthy condition.

The dairy enterprise is split between a spring and autumn herd, to enable the business to operate on a "all year round" calving system. Breeding is mainly done through artificial insemination to ensure a high standard of genetics within the offspring. There are also two stock bulls which are kept with the herd.

All calves produced on the farm are then reared by the business as either dairy herd replacements or to finish as fat cattle. This ensures that the business is maximising its return whilst providing a high level of animal welfare.

Alongside the dairy cows, calf rearing and finished cattle herds, the business also runs a separate pedigree Longhorn herd. There are currently 9 breeding cows with calves at foot. The offspring are reared either for expanding the herd or as grassfed fat cattle which are sold as meat into the local farm shop.

The business also operates a breeding sheep flock, with the offspring reared for the fat market and as ewe lamb replacements. Lambing takes place in batches during February to April each year.

Two months prior to breeding, the female cows and sheep are assessed for their condition and feed rations tailored to individual animal requirements to make sure they are getting the right nutrition prior and during pregnancy. The cattle have to be fed twice a day with the in-calf heifers and cows requiring additional attention. The sheep are fed at least once a day with supplementary feed given twice a day

prior and during lambing time. Both [redacted] and [redacted] are responsible for constantly monitoring the feed intake of the livestock across the holdings.

All calving and lambing currently takes place within the buildings at Manor Farm, to enable [redacted] s to provide constant monitoring and assistance. This means the livestock checks are regularly undertaken throughout the day but also requires the cattle and sheep to be inspected and monitored at 10pm, midnight and again at 2am and 5am throughout calving and lambing periods. Depending on when the cows and ewes give birth, this means that [redacted] might have to remain with the animal until the offspring has been born.

Farm animals require skilled supervision and regular inspection and monitoring during calving and lambing. A trained stockperson is required to observe the animal's natural behaviour (only possible when living in sight of animals) and will be able to notice the signs of labour beginning such as separation from the herd / flock and not joining the rest of the group for food. This is much harder to observe when visiting a group of animals as the arrival of the stockperson will cause a reaction (often coming over for food or running away) which masks the birthing behaviour. Supervision is required in case of parturition problems and therefore the occurrence of the need for essential care at short notice (e.g., intervention, calling the vet etc.) is vital. The care is essential as it relates directly to the welfare of the animals and the financial success of the business.

In addition to this, calving and lambing can be a difficult time especially for in-calf heifers. These animals need to be constantly monitored during each calving period during both the day and night.

During the first 2-4 hours of calves and lambs being born it is vitally important that they receive the required colostrum intake. This is a crucial time during the calving and lambing period, which means that if a specific cow or sheep is, for whatever reason, unable to provide the colostrum then [redacted] must be on hand to bottle feed the offspring with stock kept in storage. Therefore, it is essential that [redacted] are on site to deal with emergencies such as this in a quick, efficient, and safe manner.

After the birth, the calves are removed from their mothers to protect against any transmission of diseases. These are currently located within a building at Manor Farm. However, this is deemed no longer suitable due to biosecurity and the proximity of the calves in relation to the milking and breeding cows. Accordingly, an isolation unit will be created within the buildings at Manley Hall Farm to prevent the spread of infections and diseases, creating a bio secure unit. Here the calves will be reared by hand using milk machines until they are eight weeks of age. During the later stages solid feed will be introduced alongside the milk as part of the weaning process. This process is time consuming, requiring training of the calves to use the milk machines and then constant supervision to check each calf is getting the correct amount of milk and feed. The calves will be given milk at least two times a day for the first eight weeks, alongside a continuous supply of hay and fresh water, before solid feed is introduced between the milk feeds each day. Calving takes place throughout the year to ensure a continuous supply of offspring into the unit.

As all calves are homebred, they are then either reared for replacements into the dairy herd or kept all the way through to finished fat cattle at 30 months of age. The calves will be kept through to youngstock at Manley Hall Farm, before being moved to Manor Farm at the later stages for finishing or entering into the dairy herd.

Similar to parturition, the early signs of illness such as listlessness, lack of appetite or not drinking are only possible to detect by regular observation. Within sheep and cattle some illnesses such as clostridial disease and vitamin and mineral deficiencies have a very rapid and severe impact. Therefore, early diagnosis is essential.

Once a calf is born it is crucial that the calf is ear tagged during the first few days, which complies with Cross Compliance and Animal Welfare Regulations. The calves are then registered no later than 27 days after birth by making an application for a passport from the British Cattle Movement Service.

Record keeping is fundamental when keeping livestock, all individual livestock movements must be recorded, and cattle movements noted to the British Cattle Movement Service.

Other routine tasks which [redacted] undertake during the year are the frequent need for the livestock to be given supplementary medicines, such as worming injections. In addition, during calving and lambing the cows and ewes are scanned. These practices are fundamental to animal welfare and must be carried out in a controlled environment to allow minimum stress to the animals.

There will be unexpected times during the management where the Vet will need to be called out to attend certain cases, along with the routine procedure of Tuberculosis (TB) testing which is undertaken every 6 months on the holding. TB testing of livestock is an important requirement which takes place in all the cattle herds on the holdings. Concerns over bringing unknown animals into the herd and onto the farm holdings is a major reason why the business breeds and rear their own replacement dairy cows for milking, alongside the fat cattle enterprise, rather than rely on brought in stock. The financial implication to the business on having TB accidently brought into the herd is significant. The required isolation unit for the calf rearing at Manley Hall Farm is imperative for creating a bio secure environment to help combat issues such as TB.

Livestock management duties also include foot trimming, hair clipping and other activities which focus on animal health and the management of the herds and flock. The keeping of offspring and youngstock means the management burden is increased further. Additional tasks in relation of calf rearing are over and above normal livestock labour requirements.

It is fundamental for the welfare of the livestock that standards are maintained to a high level to continue to provide quality produce, which can only be achievable from both [redacted] residing on holdings at Manor Farm and Manley Hall Farm, 24 hours a day, seven days a week. High welfare standards are not only dictated by consumer demand for quality milk and meat products but are required as part of cross-compliance requirements set by the Government and other

regulatory bodies, which if not met, are subject to financial penalties. Consumer branding also pays a key role in welfare standards.

As the cattle enterprise continues to expand as part of the business plan for high quality milk and meat products it is vital that [redacted] are located on each farm unit to deal with any emergencies, animal welfare, and security from theft, which can have a direct impact on the animal's health as well as financial implications for the business. It is, therefore, important that the calves and youngstock are continually monitored by observation, which cannot take place if [redacted] is not residing at Manley Hall Farm.

The functional needs for the monitoring of the sheep flock and cattle herd are summarised in the table below;

Table 2 - Minimum Livestock Monitoring Requirements

Problem	Occurrence	Essential care required	System controls / monitoring requirement
Metabolic disorders			
Pregnancy toxaemia (Twin lamb disease)	Last few weeks of pregnancy	Can be treated with glucose injection if early symptoms (e.g., standing alone, incoordination) are spotted and acted on immediately. Otherwise often fatal.	Ewes grazing around farmstead in late pregnancy then housed before lambing.
Milk fever	After pregnancy	Can be treated with calcium injection if early symptoms (uneasiness, paddling of hind legs) picked up. Otherwise often fatal.	Monitoring of housed stock immediately post lambing.
Hypomagnesia (grass staggers)	On turnout	Can be treated with magnesium injection if early symptoms (restlessness, twitching) picked up. Otherwise often fatal.	Initial turnout to grassland around the farmstead, continual monitoring.
Lambing and Calving and relating issues			
Parturition difficulties	Throughout lambing / calving period	Assisted lambing / calving. Action required in ½ to 1 hour of parturition starting.	Continuous monitoring of ewes and cows. Skilled assistance on hand at short notice.
Post-natal lamb / calve care	Throughout lambing / calving period	Immediate action to clear airways, resuscitate etc.	Continuous monitoring. Skilled assistance on hand at short notice.
Throughout lambing / calving period	Monitoring to ensure lambs and calves take first colostrum feed.		Continuous monitoring. Skilled assistance on hand at short notice.
Mis mothering	Throughout lambing / calving period, on first turnout	Individual penning of ewes and lambs / cows and calves to ensure good mothering immediately after birth. Identification and rectification of late	Continuous monitoring. Initial turnout to nursery paddocks around farmstead.

		developed mis mothering problems.	
Assisted feeding of young lambs or calves	Throughout lambing / calving period	Monitoring to notice under nourished lambs / calves.	Continuous monitoring.
Fostering of lambs or calves	Throughout lambing / calving period	Adopting triplets or orphan lambs / calves onto alternative ewes / cows	Continuous monitoring.
Physical difficulties	Through housing period and whilst grazing close to farmstead	Removal of lambs / calves from water troughs, lambs under sheep etc. Untangling of sheep from gates or fences. Capture of escaped animals. Cast animals	Continuous monitoring.
High care stock groups (grazed around farmstead)			
Rams / Bulls	All year keep in appropriate groups except when working	Various including separating fighting animals, checking general welfare	Continuous monitoring whilst grazing around farmstead.
Replacement stock	When purchased	Newly purchased stock are nervous and flighty when they first arrive on farm. Require monitoring for escape, entanglement etc.	Continuous monitoring whilst grazing around farmstead.
Newly weaned lambs / calves	All year, as batches are required for the butchering / sale etc	Lambs / Calves upset on weaning. Therefore, particularly likely to get into physical difficulty	Continuous monitoring whilst grazing around farmstead.
Stock held for shearing	Spring / Summer	Stock restless whilst held on bare land immediately prior to sheering escape and physical difficulties possible.	Continuous monitoring whist grazing around farmstead.
Orphan lambs / calves, ill sheep, or cattle		Specialist care and monitoring of condition	Continuous monitoring whilst grazing around farmstead.

Again, monitoring for these scenarios can only be provided by trained stockpersons, such as [redacted], living within sight and sound of the animals.

In addition to the livestock enterprises operated at the holding, the business also carries out other farming activities, including grassland and arable cropping alongside the maintenance of the land and property.

The business is currently farming over 505 acres of land, the majority of which is down to grassland for grazing and forage crop production, with 120 acres of arable. Given the challenging weather conditions and seasonality of the enterprise, the majority of forage crop production is undertaken outside of normal working hours.

The growing of arable crops, including specialist crops, can be a sensitive task, which needs careful planning and constant supervision. All cultivations are carried out in hand on the farm. Crop protection is an important key within the management of arable crops. Diseases and cultural issues, such as pests, can be problematic within the cereal crops. These can only be managed in the short term by treating the crops with various sprays, which means that [redacted] must constantly monitor the crop in each individual field to eliminate the risk of spreading

and establishment of weeds and disease, which would have a knock-on effect on the harvest and price of crops.

In addition to the day-to-day enterprises operated by the business, [redacted] also have to consider the following;

Health and Safety - It is vitally important from a health and safety aspect that [redacted] are available on the two farm holdings due to the size and nature of the business, especially for the management of the calves and youngstock.

The key management and operation times throughout the year when both [redacted] are required on site from a health and safety aspect, include the following:

- The housed cattle and youngstock can be more agitated than when they are out in the fields grazing. It is vitally important that there are at least two people present for the handing of cattle, especially as they can potentially crush and trample handlers against rails, fences, and buildings.

- During calving it is a necessity for there to be at least two people on hand. It is important that the right level of care and attention is given to cows and calves, which can only be possible if there are two stockpersons on hand to provide this.

  In addition, by having at least two stockmen present it means that should the cow get into difficulties then someone is able to call the vet, whilst the other can stay with the cow during the birth. From a health and safety aspect, it is known that cows can become agitated and flighty during the birthing stage. Therefore, it is important that two experienced stockmen are present.

- The handling of cows with new-born calves from a health and safety aspect means it is extremely important that at least two people are present for these tasks. Cows can feel stressed if they feel their calves are threatened, thus putting the handlers at risk. As previously stated, the cows and calves are separated shortly after birth which requires two people present at all times. These calves will then be transferred to Manley Hall Farm.

- Vaccinating and TB testing cattle means that they have to be run through the handling system. This can cause the cattle to feel agitated, which leads to them kicking out and becoming flighty during the process. From a health and safety aspect it is important that there are at least two people present during these tasks.

- Loading and unloading cattle into the livestock trailers and lorries can cause similar issues such as when vaccinating and TB testing, with the cattle becoming agitated. Again, from a health and safety aspect these tasks require at least two experience stockpersons to be present.

Fire - When stock is housed it is vital that [redacted] are responsible for their welfare and are able to monitor for risk of fire and raise the alarm and

release stock if an emergency arises. With [redacted] at Manor Farm and [redacted] residing at Manley Hall Farm then this will be possible to do.

Water - The most common problems in livestock buildings are when stock themselves break the water fittings or where pipes and values block or freeze. Thus, monitoring of the water supply is an essential part of the regular (four time a day) routine at peak times, such as lambing and calving indoors, alongside the calf rearing at Manley Hall Farm.

Whilst this does not directly require stockpersons to live on site it is more likely that a problem with the supply will be more quickly noticed by [redacted] living on the holding, as their own domestic supplies at the farmhouses are on the same source and is, therefore, similarly affected.

Electricity - Electricity is used to provide additional heat for weak or sickly young animals such as calves and lambs. These animals are dependent on a heat source and would be likely to die in its absence. As with water, a supply problem would be noticed straightway within the workers living on site at Manor Farm.

Security - It is vital for the welfare of the stock that supplies of medicines and related products are kept close to where the animals are housed, so that they are on hand when needed. Such products are potentially hazardous to human health and need to be kept in locked storage. With both [redacted] living on site at each farmyard they will be able to keep medicines and other products safely on site.

In addition, the recognised high quality of the livestock, especially the breeding cows and calves and youngstock, are extremely valuable produce which the security of is considered to be of high importance.

Farming equipment, machinery, and fuel commodities used within the running of the farming business amount to significant value. The security of these items by [redacted] residing on site underpins the profitability and viability of the business moving forward.

For the welfare of the stock as well as the general continuity of the business it is important to take steps to prevent a potential security problem.

The requirements for essential care at short notice exist 12 months of the year. The nature of the business is to produce high quality and valued livestock. Therefore, animal welfare is as essential to the financial success of the business as it is to the animals themselves.

7. Animal Welfare Regulations

The welfare of farm animals is often considered under the framework of the “five freedoms”, which also forms the basis for the codes of good agricultural practice. These five freedoms include:

1. Freedom from hunger and thirst – 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 area;
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 animal’s own kind;
5. Freedom from fear and distress – by ensuring conditions and treatment which avoid mental suffering.

Living within sight and sound of livestock is important to being able to ensure Freedoms 1, 2, 3 and 5 are met.

Inspection by a trained eye is vital to detect the early onset of disease and general ill health. Relevant signs include;

- Listlessness
- Separation from the group
- Unusual behaviour
- Loss of body condition
- Loss of appetite
- Constipation
- Scouring
- Not cudding
- Discharge from nostril or eyes
- Over production of saliva
- Coughing
- Rapid / irregular behaviour
- Swollen joints
- Lameness

Many of these problems (are generally only detected through continual casual observation (of the type provided by living onsite), rather than routine inspection.

Compliance with animal welfare requirements is of extreme importance. The Welfare of Farmed Animas Regulations states that; Any animals which appear to be ill or injured;

- Shall be cared for appropriately without delay, and
- Where they do not respond to care, veterinary advice shall be obtained as soon as possible

To fully comply with this regulation, it is advantageous to live on site.

As part of successful calf management, it is important the following are provided at all times:

- Colostrum - which must be given to newborn calves in the first 24 hours of life.
- Calories - calories are very important to calves because they are needed to grow and remain healthy. Calories for young calves come from the milk and calf starter feed. As external temperatures decrease in accordance with the seasons, the amount of milk and feed has to increase.
- Cleanliness - calves need to have a clean, dry, well-bedded and draft–free environment.
- Comfort - in order for a calf to be healthy, it needs to be comfortable. Comfort for a calf is being well-bedded, warm and in a properly ventilated area. Ensuring the comfort of the calf means it will be healthier and will have a better average daily gain.
- Consistency - calves are creatures of habit and like the same routine day after day. They want to be fed the same feed at the same time each day.

Accordingly, there is a clear established functional need for [redacted] to be located at Manley Hall Farm within sight and sound of the livestock.

8. Financial Need

The business demonstrates clear evidence that the current business activities, including the requirement for a farm worker dwelling at Manley Hall Farm, have been budgeted and planned on a sound financial basis.

SR Lewis have invested a large amount of their own private capital into the farm, including investing in the infrastructure, equipment, and livestock. The business has also budgeted fitting out the existing buildings at Manley Hall Farm as part of operating them as the calf rearing unit.

The livestock are not only a highly valuable commodity but need to be managed carefully and effectively to meet high welfare standards and to maximise returns. The farming business income means that the proposed development is a financially viable investment.

The breeding and rearing of the cattle herd alongside the commercial sheep flock and arable enterprises means that the farming business is maximising its profits.

Accounts for the last three years have been analysed for the farming business and are available to view by the Council, as confidential documents should they be requested. These accounts confirm the viability of the business. It can be concluded that the business has been planned on a sound financial basis.

9. Other Accommodation

There are no other existing dwellings at Manley Hall Farm or any other existing accommodation in the area which is available for the occupation by [redacted]

[redacted] reside within the farmhouse at Manor Farm. The property was previously occupied by [redacted] for the last 30 plus years. They have moved out of the farmhouse to enable [redacted] The farmhouse, land and buildings forming part of Manor Farm are occupied on an Agricultural Tenancy Agreement.

This property is not suitable for two families to reside within, meaning [redacted] are currently living within accommodation away from the farm holdings. This is only available on a temporary basis and is not available to them in the longer term.

Mrs Sheila Lewis resides within her own residence which is owned separately to the farming business.

As detailed within section 4 above, the National Planning Policy and specifically TAN 6 supports farm worker dwellings where the worker is taking the majority control of a farm business to live permanently at or near their place of work. There is a clear succession plan in place, with [redacted] having already been brought into the partnership of the business. This dwelling is considered essential for the continued viability of a farming business through the farm succession process. As detailed within the functional need above, there is a clear need for [redacted] to reside onsite at Manor Farm and [redacted] to reside onside at Manley Hall Farm as part of operating the calf rearing enterprise. Without the ability of [redacted] to reside on site then the future sustainability of the business would be threatened.

Nevertheless, a comprehensive search of the residential market has been undertaken, for both properties to purchase and those to rent. This has been analysed against the budgeted earnings of the labour employed by the business. The potential affordable rent would be in the region of £692 per month (30% of earnings) and the affordable purchase price would be £90,000 (3x earnings).

We are not aware of any properties available to rent within the immediate surrounding area. It is likely that should any properties become available to rent, then these will not provide security for long term occupancy.

The Building Cost Information Service indicates that the proposed dwelling will cost in the region of £120,000 to £140,000 to fully build out, including professional fees. There are no suitable properties available within the surrounding area to purchase at that level.

It is, therefore, concluded that no other property is suitable by virtue of price, notwithstanding the fact that no other property exists within close proximity and easily accessible to the Manley Hall farmyard and buildings, and therefore has the potential to satisfy the functional need. The functional need dictates the requirement for [redacted] to reside on the holding and near to the livestock 24

hours a day, 7 days a week. The difference to being on site immediately to deal with emergencies and being 5-10 minutes away can lead to a substantial loss of animals and financial implications.

This proposal is supported by National and Local Planning Policy, which enables [redacted] to reside on the holding at Manley Hall Farm, whilst [redacted] resides at Manor Farm as part of succession and business planning.

There are no other dwellings connected to the business. Accordingly, the functional need cannot be fulfilled by another dwelling on the holding or within the area.

10. Conclusion

In summary this statement has been written in support of a full planning application for a rural worker dwelling at Manley Hall Farm.

In light of the above report there is a clear essential need to support the requirement of a rural worker dwelling to house [redacted]. This allows [redacted] to reside at Manor Farm along with the next generation.

On the basis of the information provided and given the nature and scale of the existing farming activities there is considered an essential need for this dwelling. This is in order to provide the requisite supervision of the calf and youngstock enterprises and to undertake essential husbandry duties and other management requirements outside of normal working hours.

The proposal is to erect a modest sized dwelling to house [redacted], to provide an adequate level of management for the business. The dwelling is required to allow [redacted] to be readily available at all times, as is required for the successful running of the livestock enterprise and to deal with emergencies, to manage the welfare of the livestock and to assist in the protection of the farm, machinery, commodities and animals against trespass, theft, and vandalism.

Using the standard man day calculations there is a clear support for a full time worker to live on site in relation to the agricultural business.

The proposed development requires the essential need for a farm worker dwelling, which has been informed and as a result adheres to relevant National and Local Planning Policy and Guidance. The proposed development aligns itself with Planning Policy Wales and Tan 6, being sustainable and forming part of the required development of a rural agricultural business. The dwelling has been sited to consider the rural nature of the surrounding landscape and will sit comfortably within its context.

Therefore, in accordance with Planning Policy Wales and other relevant planning policy, there is a clear need for an agricultural dwelling at Manley Hall Farm.

11. Appendices

Appendix 1 - Site Plans

Land at Manor Farm

Land App



Produced on Sep 19, 2024.
© Crown copyright and database right 2024 (licence number 100059532)

BERRYS

200 m
Scale 1:8000 (at A4)

N

Land at Manley Hall Farm

Land App



Produced on Sep 19, 2024.
© Crown copyright and database right 2024 (licence number 100059532)

BERRYS

100 m
Scale 1:5500 (at A4)

N

Land at Erbistock including Manley Hall Farm

Land App



Produced on Land App, Feb 26, 2025.
© OpenStreetMap contributors

BERRYS

200 m
Scale 1:8500 (at A4)

N

Land at Bangor-on-Dee



Produced on Land App, Feb 26, 2025.
© OpenStreetMap contributors

BERRYS

200 m
Scale 1:8500 (at A4)

N

Land at Cross Lanes



Produced on Land App, Feb 26, 2025.
© OpenStreetMap contributors

BERRYS

100 m
Scale 1:5000 (at A4)

N

Land at Erlas Hall Farm

Land App



© Crown copyright and database right 2024 (licence number 100059532)

BERRYS

100 m
Scale 1:5500 (at A4)

N