



Appeal Decision

Hearing held on 23 August 2022

Site visit made on 24 August 2022

by J Bowyer BSc(Hons) MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 30 September 2022

Appeal Ref: APP/E2205/W/22/3297749

Park Field, New Road Hill, Bonnington, Ashford, Kent TN25 7BA

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr M Homewood & Ms T Reidy-Wilde against the decision of Ashford Borough Council.
 - The application Ref 21/01229/AS, dated 2 July 2021, was refused by notice dated 11 November 2021.
 - The development proposed is change of use of land for the siting of mobile home for use as an agricultural workers dwelling; formation of a vehicular access; erection of agricultural building and ancillary development.
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Decision

1. The appeal is allowed and planning permission is granted for 'change of use of land for the siting of mobile home for use as an agricultural workers dwelling; formation of a vehicular access; erection of agricultural building and ancillary development' at Park Field, New Road Hill, Bonnington, Ashford, Kent TN25 7BA in accordance with the terms of the application, Ref 21/01229/AS, dated 2 July 2021 and subject to the conditions in the attached schedule.

Preliminary Matters

2. There were differences in how the appeal site address was given on the planning application form, the appeal form and the Council's decision notice. At the Hearing, the parties agreed that the site address used in the Statement of Common Ground ('SoCG') was correct, and consequently this is the address that I have used in the banner heading and my decision above.
3. The appeal form and the decision notice also gave a different development description to that originally entered on the planning application form. I have used the description as it appears on the appeal form and decision notice since the appellants have provided written confirmation that they agree to this amended version, and it is also on this basis that interested parties were notified of the proposal.
4. The application form indicates that the development applied for commenced in June 2021 but was not complete. At my visit, I saw an access from New Road Hill had been created and a mobile home was on the site, albeit not in use as a dwelling. However, the mobile home was in a different position to that shown on the submitted plans, and the appellant's evidence also confirms that the access currently present is not that which permission is being sought for. For

the avoidance of doubt, I have considered the appeal on the basis of the development as it is shown on the submitted plans.

5. Shortly before the Hearing, the Council provided a written submission prepared by Price Whitehead setting out the Council's position in response to the appellants' business plan ('the PW Submission'). This includes a large number of detailed points and raises concerns which had not been previously clearly articulated within the Council's evidence, and it is regrettable that it was not provided at an earlier point in the process. Nevertheless, the appellants had been able to consider the PW Submission and were in a position to respond to it at the Hearing, and I have therefore taken it into account.

Main Issues

6. The main issues are:
 - a) whether or not there is an essential need for the development proposed on the site, including with regard to:
 - i. whether or not it is necessary for a rural worker to live on the site, and
 - ii. whether or not there is a realistic prospect of the enterprise becoming viable and sustainable; and
 - b) the effect of the proposal on the character and appearance of the landscape.

Reasons

7. The appeal site is part of a large field with access from New Road Hill. The appeal proposes development including a mobile home to be used as a dwelling for an agricultural worker for a 3-year temporary period, and a general purpose agricultural building. These are intended to support the operation of an agricultural enterprise on the site and wider field. Nevertheless, the use of the wider holding for agriculture is not in itself part of the development that is before me to consider as part of the appeal.
8. Details of how the enterprise is planned to develop are included within the appellants Agricultural Appraisal ('the AA') prepared by Reading Agricultural Consultants ('RAC'). This includes a business plan based on the breeding and rearing of alpacas for sale, with other income streams including the sale of alpaca yarn and products, sale of lamb, sale of free-range eggs, making and sale of hay and camping and alpaca care and experience days.
9. At the time the Council determined the application, it commented that there was no current enterprise. However, activity has since commenced, with preparatory works including the sowing of the wider site with alpaca grass, fencing and provision of field shelters; and purchase of alpacas which I saw grazing at the time of my visit. That said, the appellants advised at the Hearing that bringing forward the business plan laid out within the AA is predicated on planning permission being granted. Notwithstanding the calendar years noted in the business plan, it has not therefore been formally implemented in advance of the appeal being determined, and activity identified in Year 1 remains a future projection.

Essential Need for the Development

Mobile Home

10. Bonnington is not one of the listed settlements where Policy HOU5 of the Ashford Local Plan 2030 adopted in 2019 ('the ALP') identifies residential development meeting specified criteria will be generally acceptable, and there is no dispute between the main parties that the site is in the countryside in planning policy terms. However, Policy HOU5 does set out that residential development elsewhere in the countryside may be permitted in situations including accommodation to cater for an essential need for a rural worker to live permanently at or near their place of work in the countryside. In this regard, Policy HOU5 is generally consistent with the National Planning Policy Framework ('the Framework') which similarly sets out that planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more listed circumstances apply. These circumstances include where there is an essential need for a rural worker to live permanently at or near their place of work in the countryside.
11. Neither Policy HOU5 nor the Framework provide further guidance on how 'essential need' should be judged. However, I have been referred to the national Planning Practice Guidance ('the PPG') which identifies considerations that it may be relevant to take into account when considering essential need under the terms of the Framework. These include evidence of the necessity for a rural worker to live at, or in close proximity to, their place of work to ensure the effective operation of an agricultural, forestry or similar land-based rural enterprise; the degree to which there is confidence that the enterprise will remain viable for the foreseeable future; and, in the case of new enterprises, whether it is appropriate to consider granting permission for a temporary dwelling for a trial period. The PPG does not impose a requirement to consider these factors. Nor does it specify benchmarks or similar that a proposal should meet in relation to the listed considerations. Nevertheless, I consider the PPG to provide useful guidance in this case, and I have taken it into account.

Whether or not it is necessary for a rural worker to live on the site

12. The primary justification advanced for a rural worker to live on the site is to care for the alpacas which the AA outlines are planned to reach a herd of some 20 breeding females, and 42 alpacas in total, from Year 3 of the business plan, including through the purchase of 10 pregnant females at the start of Year 1.
13. The Council has challenged the appellants' estimated alpaca stock numbers. Accounting for sale of animals, it considers that it would not be possible to reach a herd of 20 breeding females until Year 4 rather than Year 3 as asserted by the appellants. It became apparent at the Hearing that the difference between the main parties on this point largely results from the assumed age at which a female cria can be put to stud; the appellants have suggested that this can occur from 12 months, while the Council based its assessment on an age of 2 years.
14. In support of their position, the Council referred to discussion with a representative at the British Alpaca Society ('BAS'). Full details of the discussion are not before me, but the summary given at the Hearing referred to advice that the representative would not put an alpaca to stud until 14 months or 2 years of age. This differs from the advice on the BAS website

highlighted by the appellants which states that female cria are ready to be put to stud when they have reached 60% of the weight of their mother or are 14 months old.

15. I do not know the reason for this apparent difference in views ostensibly both expressed by the BAS. However, I consider that the advice as published on the Society's website would attract greater weight. Furthermore, both main parties' evidence referred to 14 months as an age that cria could be put to stud, which would be far closer to the 12 months assumed by the appellants than the Council's 2 years. Moreover, there would seem to be scope for at least some females to reach 60% of the weight of their mother earlier and potentially by 12 months. The Council said that it would not agree with putting a female to stud at 12 months, but did not provide firm evidence that a female having reached 60% of the weight of her mother would be biologically ready as indicated by the BAS website. On the strength of the evidence before me, I therefore find the appellants' position to be more compelling.
16. Of the breeding females, the AA assumes that 80% would conceive each year and produce cria, leaving 20% that would not. In response to criticism that the estimated stock figures do not account for abortion rates, the appellants referred to 'Llamas and Alpacas: A Guide to Management' which indicates that roughly 10% of pregnancies fail between conception and birth. On this basis, I find that the assumed birth numbers would be reasonable.
17. With regard to all of the evidence presented, I consider that reaching a herd of around 20 breeding females and 42 alpacas in total from Year 3 onwards as assumed by the appellants could well be achievable, and that any shortfall owing to delay in putting female cria to stud at 14 months rather than 12 would be very minor overall. Furthermore, the appellants confirm that current alpaca numbers are on track to exceed those that the business plan suggests will be on site going into Year 2. This is likely to further support overall stock increases at least in line with the levels envisaged.
18. The number of alpacas estimated does not in itself show that it would be necessary to live at the site, but provides important context for consideration of the implications of their particular characteristics.
19. The AA indicates that these characteristics include a gestation period of around 330 days with variation by up to 30 days either side. This makes it difficult to predict the timing of births. I also heard that mating is not necessarily straightforward, requiring observation and possibly intervention as each female is put to stud which would not be possible for the whole herd concurrently. Mating may also need to be repeated, including where conception fails or is aborted, and noting the long gestation period, I agree with the appellants that it would be impractical for the business to wait until the following year's cycle to put a female back to stud in these circumstances. Given these factors, I am in no doubt that it would be very challenging to group pregnancies and births, and that with a herd of around 20 breeding females, there would be a wide period through the year over which births may potentially occur.
20. During this period, I heard from an interested party that births mostly occur between 4am and 2pm, but while that may be typical, I have also been provided with evidence that births could occur at any time of the day or night. I have no firm reason to doubt this possibility, nor the appellants' evidence that close observation of animals to identify any problems during pregnancy or a

need for assistance at parturition is required. The AA also highlights that lack of milk following births is not uncommon and can require artificial rearing of cria. This is said to involve 2-hourly feeds for the first 2 weeks, 3-hourly feeds to 8 weeks and 3-daily feeds to 4 months. In such a situation, it is clear that there would be a need for an intensive on-site presence for at least 8 weeks. Furthermore, this presence could potentially be required for more than one cria, which for the reasons above could be born over a fairly long period.

21. Although it was suggested to me that alpacas are a hardy species, the AA also highlights that they deliberately seek to hide signs of illness or weakness, and that spending regular time with them assists in ensuring that health or welfare issues are spotted promptly and can be dealt with. There was some discussion at the Hearing about potential for monitoring of the alpacas by CCTV. Nevertheless, I have little to indicate that this would be a practical or effective means to monitor their wellbeing, particularly given their characteristics and that they generally live and birth outdoors.
22. Taking all of these factors together, it seems to me that effective monitoring of the alpacas and prompt action to intervene where necessary would require a worker to be readily available at most times, day and night through the year, in order to ensure their wellbeing and to properly establish and maintain a breeding herd.
23. Further sources of income identified in the AA include the sale of lamb from a flock of 30 ewes and the sale of free-range eggs from up to 300 chickens. The number of sheep anticipated are fairly low, but would need some supervision at lambing time to ensure the welfare of ewes and lambs, albeit that this is likely to be over a more concentrated period than the alpacas. Similarly, while the number of chickens would be small, an on-site presence would assist in responding quickly to emergency situations such as predators or loud noises.
24. On balance, I consider that the successful and proper management and ensuring the welfare of the mix of livestock proposed would reasonably require the close presence of a rural worker, including overnight, for much of the year. The AA additionally refers to an on-site presence as a deterrent to vandalism and theft of stock or equipment, and that it would support being able to deal with fire risk. I was also provided with details of past break-ins at the site, and while interested parties commented at the Hearing that crime rates are generally low in this area, I also heard of a large number of break-ins that had occurred at a local farm. I accept that security is likely to be a concern for any rural business, and from the evidence before me I do not consider that this factor would in itself justify a dwelling. Nevertheless, the loss of stock and/or equipment would be likely to affect the business, and lends further support to my view that a close presence would support the success of the enterprise.
25. The need for close presence of a rural worker arises because of the mix of intended activities, but many rural enterprises diversify and rely on a mix of income streams, and I do not consider its derivation from a combination of factors is in itself a reason to discount the need.
26. Also in relation to the mix of activities, I have noted concerns that the size of the wider site at around 10.3ha would not be able to support everything proposed. However, there is little difference between the main parties in relation to the area required for the alpacas and sheep having regard to stocking densities, and even taking the Council's figures would result in a

combined requirement for around 5.72ha. The Council suggests that there would be additional land required for hens, but I have no compelling reason to doubt that these could intergraze with alpaca as the appellants advise, nor that they could be suitably accommodated within mobile huts/runs. I also saw that rights of way crossing the site do not significantly reduce the area of land available.

27. The Council suggests that clean ground would be required for camping and I heard from an interested party that scouting groups would require camping grounds that had not been occupied by animals in the previous 3 weeks. The appellants disagree that clean ground would be required, but it would in any event seem possible to manage areas of the site used for livestock to allow for a 3 week window in advance of any camping given that this is intended to occur over a concentrated and relatively short period in peak season.
28. On this basis, there would seem to me to be sufficient land available to support the suggested livestock and camping, with further land available for hay production. The appellants advise that the site has formerly been used for grazing and has been sowed with alpaca grass, and while I have noted comments by interested parties, I have no compelling information to find that the site could not realistically support the types of livestock and activities proposed. The size and characteristics of the wider site do not therefore undermine my view that the close presence of a rural worker to the site would in this case be necessary.
29. In this regard, I note that my conclusions are consistent with those of the Council's agricultural advisor at the time of the planning application (Rural Planning Limited) who commented that 'in terms of overall functional need, I would accept, on balance, that the successful and proper management of the proposed mix of activities indicated in the RAC Appraisal, including the care of a variety of animals and poultry, and overall security, would warrant the provision of on-site accommodation'. The Council was not bound by this advice or required to reach the same conclusion. However, its report on the application did not offer substantive reasons to depart from this view. At the Hearing, the Council also accepted that an on-site presence would be necessary on establishment of a herd of 20 breeding female alpacas, albeit that it disputed when such a point would be reached.
30. I have already found that it would not be unrealistic for a herd of 20 breeding female alpacas to be established by Year 3 of the business plan. The requirement for a rural worker to be present may not fully materialise until this point. Even so, both main parties refer to a stock level of around 14 breeding female alpacas on the site at Year 2. Even taking the Council's assessment that there would be around 25 alpacas on the holding in total rather than the 30 anticipated by the appellants, this number of breeding females together with the other livestock proposed would still give rise to a need for a fairly considerable presence by a rural worker across the year at Year 2. The lack of such a presence while the enterprise is being established would in my view be likely to hinder its responsible and successful operation.
31. The Council has not argued that there would be other accommodation that could be suitable to accommodate a rural worker. Interested parties have referred generally to properties on the market locally in Mersham, Aldington, Bonnington and Bislington. However, I have not been made aware of any

available dwellings sufficiently close to offer the necessary continuous presence at or very near to the site to enable the proper management and monitoring of the enterprise as an alternative to the proposed dwelling.

32. From the evidence before me, the dwelling would be reasonably required to support the agricultural enterprise, and I find on balance that it would be necessary for a rural worker to live on the site.
33. In reaching this view, I have noted an appeal decision for a site at Heinz Orchard in Maidstone referred to by the Council where a proposed alpaca enterprise was not found to necessitate a presence on site at most times of day and night throughout the year. I do not have full details of the circumstances which led to this conclusion, but note that the decision indicates that the enterprise was predicated only on sale of alpacas and fibre/finished garments from them. The circumstances are not therefore directly comparable to the appeal development, and it does not alter my conclusions on the proposal which are based on the specific evidence before me. I have also been provided with details of planning permissions that were subsequently granted on the Heinz Orchard site for a temporary dwelling, and then for a permanent dwelling, but given that these would also turn on their specific merits, they are not determinative.

Whether or not there is a realistic prospect of the enterprise becoming viable and sustainable

34. The sale of alpacas is the largest income source identified within the appellants' business plan. The Council's evidence suggests that sales of alpacas are largely limited to other breeders, as domestic pets or the tourism leisure market, and I note comments referring to alpaca breeding stock values as the result of a speculative bubble which would only be sustainable as long as there were new breeders prepared to buy stock. Be that as it may, the appellants' evidence indicates that the market has persisted in this country for some time now and that prices have been fairly consistent since 2011, and there is little substantive evidence before me to suggest that this will not continue.
35. I have found that the alpaca herd growth numbers suggested by the appellants, and consequently the number of animals that would be available for sale, would not be unrealistic. In terms of the assumed sale prices, these reflect average asking prices on the Alpaca Seller website at the time the AA was prepared. The Council accepts that the price for non-breeding male alpacas is fair and reasonable, and I have no firm reason to take a different view. The Council also accepted at the Hearing that the prices for breeding males and females could be achieved by a well-established herd, but considers that this would not be realistic for an unproven new herd, and referred to examples of lower asking prices from review of a sample of sellers. However, the information before me also points to a large range in prices for breeding males and females, with some substantially higher than even the average prices assumed by the appellants.
36. In this case, the appellants confirmed that stock bought into the holding has and would have a proven lineage, and that appearances at shows would further provide opportunity to demonstrate provenance. They also indicated that the assumed prices were consistent with the existing stock purchased and with receipts from other enterprises, although details of these purchases are not before me which limits somewhat the weight that I can afford to this comment.

In my judgement, realising the average selling prices assumed in the business plan for breeding alpacas would be ambitious, particularly in the earliest years of the business before a reputation has been established, and I cannot be sure that sales would be made at the numbers envisaged by the business plan. Based on all that I have seen and heard though, I am not persuaded that there is no reasonable prospect of achieving these sales prices within the life of the business plan.

37. Drawing these factors together, I find that the appellants' assumed income from sale of breeding alpacas would be optimistic, but not beyond the realms of reasonable possibility, certainly by Year 3 of the business plan and onwards.
38. With regard to the other sources of income identified by the appellants, I heard that prices for alpaca wool vary according to the colour of fleeces and the quality of fibres. The appellants indicated though that fibre sampling has been done for all alpacas bought, and it seems to me that there would be scope to manage the herd for fleece colour and quality. In addition, the business plan does not assume that all fleeces would be of usable quality, providing some allowance for wastage. I also heard that the appellants have been able to sell unprocessed fleeces from the existing herd, and while few in number to date, these sales have brought in much higher prices per kg than assumed in the business plan. I further note that the PW Submission commented that the headline figures in the business plan for fleece/wool sales appear broadly acceptable, and in my assessment, overall income from wool sales at or close to that assumed by the business plan would be realistic.
39. The intended lamb sales would come from Romney sheep. The Council suggested that a lambing percentage of 130% (rather than 150% assumed by the appellants) would be more realistic for this breed, referring to experience of other clients with pure breeds, the small size of the holding and the appellants' lack of experience. The appellants' figure reflects percentages quoted in the John Nix Farm Management Pocketbook ('the JNP'), and although I see no reason in principle that a small holding with requisite experience and/or support could not achieve these levels, I agree with the Council that it may be challenging for a new enterprise. Nevertheless, the small size of the flock means that the difference between the parties in the number of lambs produced that would then be available for sale would be small.
40. In the absence of evidence demonstrating a local demand for produce and noting comments made by the Council and interested parties regarding existing producers in the area, I am however concerned that sales of lamb and particularly free range eggs at the level suggested may not be achievable. That said, I do not doubt that it would be possible to find some market and make sales providing a source of revenue which could be pursued, albeit that this could result in a lower income than assumed by the business plan.
41. There is limited detail in the business plan to explain the suggested income from camping and experience days, and I note comments regarding existing camping/glamping and alpaca experiences that are available locally. I was also advised that a previous application for a Freedom Camping licence on the site was rejected. However, the appellants outline that camping would occur under permitted development rights, and is intended to comprise a low number of high value 'glamping' pitches in place during peak demand periods with potential also for camping by participants on Duke of Edinburgh award scheme

activities. Given these characteristics, it seems to me that likely occupancy levels may not be directly comparable to existing camping sites in the area where I was advised of low overall occupancy rates of around 22%. The Council also suggested that the income stated from Year 4 of the business plan onwards would require 7 guests for every night that camping would be possible under permitted development rights. However, it is not clear that the quoted typical campsite pitch fee that this is based on would reflect the glamping proposed. Moreover, this does not take into account income from alpaca care and experience days which the appellants indicate has already generated interest. Overall, I am satisfied that the income suggested from camping and experience days would not be unreasonable.

42. I have already found that there would be likely to be land available within the wider site that could be used for hay making. The business plan does include an allowance for income for hay which reduces in later years as livestock numbers increase. However, this is not a significant contributor to profit overall, and even if it was the case that no hay was produced for sale, the loss of this income would not significantly affect the overall viability of the enterprise. The plan also allows for purchase of hay to feed the proposed livestock which I consider further below, and is not therefore reliant on production from the site.
43. At the hearing, the appellants confirmed their entitlement to claim Government grant in the form of basic payment. The PW Submission notes that the allowance assumed in the business plan for basic payment grant is broadly in line with published rates, but that the scheme is scheduled to end and cannot be relied on in the longer term. That may be, but I was informed that it would be replaced by other schemes. The detail of future schemes and the level of grant that the site would be eligible for is currently unclear, but I do not consider this income should be wholly discounted, and I further note that it is a small element of the overall income stream.
44. Interested parties have referred to one of the appellants continuing other outside employment, but this is not income relied on by the business plan to support the enterprise.
45. Turning to consider costs, the appellants figures are generally based on figures taken from the JNP. The Council prefers the Agricultural Budgeting and Costing Book ('the ABC'), but both are published industry standard reference books.
46. The costs assumed by the appellants reflect figures at the time the business plan was prepared. Given current economic trends, it is likely that these costs would have increased since that time and may well continue to increase further in future. However, I have no firm reason to doubt that the prices for produce would also be likely to increase, albeit that there may be some lag, and I note comments that alpaca sales remained buoyant after the 2008 recession. It is also not possible to predict with any certainty how the economy may change in future. As a consequence, I consider it reasonable to assess the business plan on an inflation-neutral basis which also reflects the approach taken in an appeal decision at Sienna's Valley Farm that was drawn to my attention, and I do not find that recent inflation and price rises undermine the business plan overall.
47. With specific regard to feed for alpacas, the greatest difference between the parties reflects the cost of supplying hay, with the Council suggesting an

annual need for nearly 4 times more hay than assumed by the appellants. In support of this, the Council refers to published hay requirements for sheep. However, there are published figures available for alpacas, including in the JNP on which the appellants' hay allowance is based. I accept that figures for sheep may be supported by more extensive real-world data given their greater prevalence. Even so, that does not mean that the published figures for alpacas are inaccurate, and to my mind, these would be likely to offer a more realistic guide according to the specific characteristics, digestion and requirements of alpacas. I also heard from the appellants' representative that the quoted figures are in line with their experience of alpacas elsewhere. Notwithstanding the intention to produce hay on site, the appellants' costs also allow for the full hay requirement to be brought in. On this basis, I find that the costs for hay feed for the alpacas assumed by the appellants would be reasonable.

48. There is also some disagreement over the costs associated with alpaca feed concentrate. The Council refers to a requirement for 150-300g per day, while the appellants advised that costs in the business plan were based on a requirement for around 100g per adult per day in line with the JNP. I am unable to say with any certainty that either parties figure would be more preferable than the other as a general guide, but I heard that the feed product used by the appellants indicates 70g per day should be provided. The assumed requirement would therefore seem to me to be reasonable, but even if it were a little low, the consequent difference in overall costs would be small.
49. The Council suggested that vet, medication and sundry costs for the alpacas would ultimately depend on the skills of the appellants, but I do not consider it unreasonable to base these on typical costs indicated in the JNP. The Council also accepted that the identified costs associated with processing alpaca wool would appear broadly acceptable. It comments that there are no details of how wool would be packaged, stored, marketed and sold, but I was informed that marketing and sales would be mostly online incurring little cost, and that wool could be stored in the general purpose building. The business plan also allows for higher shearing costs per adult alpaca than the Council's figures quoted in the PW Submission, and I have already referred to opportunity for sale of unprocessed fleeces which would incur very limited production costs. It therefore seems to me that overall costs incurred in relation to the alpaca wool would be unlikely to be significantly higher than assumed in the business plan.
50. The costs allowed for lamb sales are based on the JNP. The Council asserts that the assumed slaughter and butchery costs are unrealistically low based on current butchers offering this service, but this would only affect private lamb sales, and packing and storage of lamb would not take place on the site, avoiding a requirement for refrigeration. Even if I were to accept the Council's figures for slaughter and butchery, I do not find that there is compelling evidence to show that the other lamb costs have been significantly underestimated, and the overall impact on total variable costs assumed would be minor.
51. The costs allowed for egg production are similarly based on the JNP. The Council suggests that feed costs would be higher, and that the mortality rate figure should also be increased with reference to figures from the ABC and rising costs. I have little clear evidence to favour either the JNP or the ABC figures on these points, and it would seem reasonable to take a position some way between them. However, the Council's evidence refers to recent and future

cost increases which I have dealt with above as informing their view of these costs, and I therefore consider the position would appropriately sit closer to the appellants' figures.

52. There would however be likely to be some additional distribution costs which are not accounted for in the business plan given that the appellants have referred to potential for some deliveries and sales at farmers markets in addition to sales of eggs at the farm gate. The appellants also acknowledged that supply egg boxes for customers would add some further costs, although I share their view that these would be far less than the packaging cost suggested by the Council which seems to me to be unrealistically high if purchased in any kind of volume. Based on the evidence before me, I find that the costs associated with egg sales would be likely to be higher than assumed by the appellants, but not as high as the Council suggests.
53. There is an allowance in the plan for general overheads based on the JNP which I heard would cover aspects such as farm maintenance, water and electricity, insurance, fees and subscriptions. It seems to me that this would cover many of the other costs which the Council and interested parties suggested had been omitted from the plan including those associated with pest control, biosecurity, utilities, registration fees and meeting regulatory and legislative requirements.
54. There is also an allowance for capital investment which would cover elements such as costs of infrastructure and livestock. In the absence of a full break down of what would be covered by the allowed investment figure, I am unable to say with any certainty that it would be sufficient to cover all likely capital costs. However, additional capital investment would not substantially increase the required return to investment figure.
55. In addition to a return to capital, the business plan includes labour, a return to the land, and the cost of the temporary dwelling as inputs requiring a reasonable return that the enterprise should turn a sufficient net profit to provide in order to be viable. The evidence before me does not offer compelling challenge to the suggested returns to land or labour, and while interested parties questioned the availability of a mortgage for a temporary dwelling, I see no reason to doubt the appellants' suggestion that a loan would instead be available.
56. Drawing these matters together, I consider that the income assumed by the appellants is on the high side, largely as a result of the income assumed from lamb and chicken sales being overstated. I also consider that the assumed costs may be underestimated in relation to alpaca concentrate feed, lamb production and egg production, although not substantially so. Margins would therefore be more borderline than the appellants assert, and I agree with the Council and interested parties that there is uncertainty inherent in the business plan. Even so and allowing for a substantial reduction in income from lamb and egg sales should the anticipated markets not emerge locally, the degree of reduction that I consider would be likely taking a cumulative view across the business plan as a whole and in light of all of the criticisms levelled against it is not so great that I consider there would be no reasonable chance of achieving a net profit by Year 3 of the business plan and increasing thereafter. This would be the case even if it were necessary to increase the reasonable return to allow for some uplift in capital investment.

57. Moreover, the appellants comment that the proposal for a dwelling for a temporary 3-year trial period would allow them to develop and prove the business, including to demonstrate markets for the intended produce and/or to adapt as necessary. To my reading, the guidance within the PPG noting that considerations relevant to assessment of essential need could include whether it is appropriate to consider granting permission for a temporary dwelling for a trial period does not indicate that a temporary permission should always be granted. However, I find on balance from the evidence before me that there is a reasonable prospect that the enterprise could become viable and sustainable by the end of the temporary period, and I do not consider there is a significant risk that it would cease in the very short term. I find that it would in this case therefore be appropriate to allow the enterprise to prove itself. Actual performance and ongoing prospects and requirements for a dwelling could then be fully tested should a future application be made for a permanent dwelling after the temporary period.

Agricultural Building

58. The general purpose agricultural building would be multipurpose, with uses including storage of equipment and hay; fleece sorting, working and storage; and occasional livestock use including shearing and lambing. It would be fairly typical of agricultural buildings, and while not annotated on the plans, the appellants' confirmed that the timber cladding to the upper walls would be hit and miss boarding.
59. With regard to its suitability for the intended purposes, I note that the building is not proposed to be routinely used for housing livestock, with field shelters and chicken huts provided for this purpose elsewhere on the site. An interested party referred to experience of alpacas being kept under shelter, but the appellants describe that it is not necessary for them to be inside and I have no firm reason to find that field shelters would not offer adequate protection. There would be briefer periods when livestock may be inside the building including at shearing or lambing time, or when unwell. During these periods the hit and miss boarding together with the transparent roof panels would offer light and ventilation, even with a container for equipment storage and a partial mezzanine which the appellants suggest could be installed under permitted development rights.
60. The Council's report on the application commented that the building is considered to be of reasonable size for the identified requirements, and I have no firm reason to disagree. As a consequence, and given my findings above, I am satisfied that the agricultural building would be suited and reasonably necessary to serve the agricultural use of the wider site, and it would be essential for the development to be located in the countryside.

Conclusion on First Main Issue

61. For these reasons, I am satisfied that the general purpose agricultural building would be necessary. It would also be necessary for a worker to live at the site, and on the strength of the evidence before me, I find on balance that I have sufficient confidence that the enterprise could become viable so as to sustain this need in the longer term. The evidence before me shows continuing investment in the enterprise, and while I have noted comments regarding the reason for the proposal, I have no firm basis to question the appellants' intentions.

62. I appreciate that services, facilities and access to public transport in the vicinity of the site are very limited, and that it is not a location where a new dwelling would generally be supported. However, I conclude for these reasons that there is an essential need for the development proposed on the site to cater for an essential need for a rural worker to live permanently at or near their place of work in the countryside. I therefore find that this is a circumstance in which a new home may be provided in the countryside in accordance with the terms of Policy HOU5 of the ALP and the Framework.
63. The Council has also referred to Policy EMP5 of the ALP which relates to proposals for employment development on new sites in the countryside. Based on the supporting text which refers to employment premises, it seems to me that this policy is directed more to proposals for more traditional employment uses rather than in agriculture as is proposed by the appeal. In any event though, for the reasons above I see no conflict with Policy EMP5 insofar as it includes a requirement that it is essential for development to be located in the countryside.

Character and Appearance

64. The field including the appeal site is within the Low Weald National Character Area, and the Bonnington Wooded Farmlands Local Landscape Character Area ('LLCA') as identified by the Landscape Character Supplementary Planning Document 2011 ('SPD'). Both the SPD and the appellants' Landscape and Visual Analysis ('LVA') note key characteristics of the LLCA as including an undulating landform, mixed farmland with small fields, deciduous and evergreen enclosing woodland blocks, native hedgerows with large standard oak trees and a strong sense of enclosure. Equestrian grazing and land use, narrow and hedge lined roads and the non-nucleic settlement of Bonnington with traditional houses and stone farm buildings are also highlighted.
65. In keeping with these characteristics, I saw that the area near to the appeal site predominantly comprises a broad agricultural landscape. It includes dispersed buildings, farmsteads and small, generally loose groups of buildings which appear typically to be in residential, agricultural or equestrian use set amongst open agricultural fields, paddocks and woodland blocks. This contributes a distinctly rural character to the area which together with the undulating form of the land makes for an attractive landscape, albeit one that is influenced by the uses taking place upon it and which I agree with the LVA would reasonably be described as 'working'.
66. The field including the appeal site is largely open, with tree and hedge-lined boundaries. The proposed buildings would result in some loss of openness, but the development applied for would occupy only a relatively small part of the wider field with which it would be associated, and would not harmfully disrupt the pattern and overall composition of the field boundaries or landform.
67. The buildings themselves would also be arranged around a farmyard, and would not be unusual features within the surrounding landscape which often includes scattered farmsteads. Both would be of simple form and relatively functional appearance, and I am satisfied in view of the mixed styles of other nearby buildings that their architecture and external materials would not be incongruous.

68. In addition, the mobile home is of modest footprint and single-storey height, and its scale would not stand out against other dwellings nearby. The general purpose agricultural building would be larger, and the Council suggested in discussion on this main issue at the Hearing that its size had not been justified. However, it has not advanced compelling reasons to depart from the view expressed in its report on the application that the building would appear broadly of a reasonable size for the identified requirements, and there is no substantive evidence before me to suggest that the building's size would be excessive to accommodate the intended uses. In any event, its scale and massing would not be out of keeping with other agricultural buildings that I saw in the vicinity. These include at neighbouring Goddard Farm where I observed a farmyard with a group of barn-style structures, including a fairly substantial barn with a barrel curved roof that is a prominent feature close to New Road Hill and the site.
69. In my judgement, the development on the site would therefore respond sensitively to the defining characteristics of the landscape. Moreover, the buildings would occupy a fairly discreet position close to the boundary with New Road Hill towards the lower part of the field.
70. I acknowledge that there would be public views of the development, including from New Road Hill and Cherry Orchard Lane and from rights of way in the area, as well as some private views from nearby properties. However, the fact that the development would be visible is not in itself evidence of harm. In the most immediate and unobstructed views from public rights of way AE467 and AE514 which cross the wider site to the west, the development would largely be seen against the backdrop of the neighbouring two-storey dwelling and prominent curved roof barn at Goddard Farm which would significantly reduce its visual impact. Based on my observations at my visit and given the scale of the structures, trees and hedgerows both at the appeal site and in the wider surroundings, and the buildings at Goddard Farm, would provide for significant screening of the development, and the general fall in topography of the closest land to the south east away from New Road Hill would further restrict potential near views from this direction. Other short to mid-range views of it would generally therefore be glimpsed or only partial, and the distances involved further mean that the site would make up only a very small component of any longer-range views. In addition, the development would be seen and read together with the cluster of buildings at Goddard Farm from many viewpoints, even where it would not be seen directly against them.
71. The appellants have also proposed that additional planting could be provided within the wider site, and details could be secured by planning condition to ensure any landscaping would be appropriate to its surroundings. Without firm details, the weight that I can afford to this planting is limited, but it would nevertheless be likely to help to further soften views of the development from at least some points including from the rights of way to the west, even without offering full screening.
72. Given these factors and my findings above that the proposal would not be uncharacteristic, I find that the visual impact of the development would be limited, and it would not be conspicuous or intrusive within the landscape. It would therefore sit comfortably within its surroundings.

73. I recognise that the boundary of the Kent Downs Area of Outstanding Natural Beauty ('AONB') is a little over 200m to the east of the appeal site beyond Goddard Farm on generally rising ground. The Council has not asserted that there would be harm to the AONB. Nevertheless, I am mindful of the requirement under Section 85 of the Countryside and Rights of Way Act 2000 for relevant authorities to have regard to the purposes of conserving and enhancing the natural beauty of AONBs when performing their functions.
74. In this case, the development would be apparent in some views towards the AONB, but these views would generally already include the intervening Goddard Farm buildings. Similarly, the development would be set beyond the Goddard Farm buildings in any views of it from within the AONB. Having regard to these relationships as well as the compatibility of the development with its surroundings, I find that the proposal would not appear striking or jarring in views either towards or out of the AONB and it would not detract from the setting. I am accordingly satisfied that the special qualities and natural beauty of the AONB would be conserved.
75. For these reasons, I find that the siting and scale of the development would be appropriate to its surroundings, and I conclude on this main issue that the proposal would relate sympathetically to the prevailing character and appearance of the landscape. I therefore find no conflict with Policies SP1, SP6, ENV3a or HOU5 of the ALP insofar as they together broadly seek high quality design and development that conserves and enhances the Borough's natural environment and landscapes and that responds to landscape characteristics and to the prevailing character of the area. For the same reasons, the proposal would accord with requirements within the Framework including seeking development that is sympathetic to local character including the surrounding landscape setting. Notwithstanding my reservations about the relevance of Policy EMP5 in this case, I also find no conflict with the requirements within this policy for development to integrate sensitively into its context and to respect the landscape setting.
76. At the Hearing, the appellants made submissions to the effect that the stationing on the site of a caravan used for agricultural rather than residential purposes would not require planning permission, and that an agricultural building sited further from New Road Hill could also be permitted development. However, these suggestions do not alter my conclusion above that the effect of the proposal on the character and appearance of the landscape would be acceptable.

Other Matters

77. The Council's third reason for refusal related to highway safety, stating that insufficient information had been submitted to allow a full assessment of impacts of the development. However, the Council's appeal statement and the SoCG confirm that this reason for refusal is no longer contested following review by the Council's highways consultee of further information including the results of seven-day speed survey and identification of visibility splays from the site access and subject to a number of suggested conditions.
78. I have noted concerns raised by interested parties that stated vehicle movements of no more than 7 per day is unrealistic given the mix of activities that are suggested to take place on the wider site. However, the evidence before me does not suggest that use of the appeal or wider sites for agriculture

would require planning permission. Camping is also proposed to take place utilising permitted development rights. In any event, there is no substantive evidence to suggest that highway safety would be compromised by additional traffic from the site, nor that impacts on the surrounding road network would be severe so as to lead me to take a different view from the Council. Indeed, based on my observations at my visit, I agree with the appellants that visibility from the proposed access would be improved in comparison to the existing access to the wider site that it would replace given its greater distance from the bend in New Road Hill to the south.

79. The proposal also includes provision for parking and a yard within the site, and subject to the positioning of gates back from New Road Hill which could be secured by planning condition, vehicles accessing the site would be able to draw clear of the highway, reducing likely obstruction.
80. In the context of paragraph 111 of the Framework and subject to planning conditions, I am satisfied that the proposal would not unacceptably harm highway safety or the local road network. I also find no conflict with Policies TRA5 or TRA7 of the ALP which include requirements broadly for development to demonstrate safe pedestrian access and movement routes, that new accesses or intensified use of accesses does not give rise to clear risk of traffic accidents or significant traffic delays, and that traffic movements can be accommodated, resolved or mitigated to avoid severe cumulative residual impacts.
81. There would be views of the development from neighbouring properties, including from Goddard Farm opposite, but given the scale of the buildings and the separation that would be provided, the relationship would not lead to unacceptable loss of outlook or privacy for neighbouring occupiers. I also consider that the separation would be sufficient to avoid unacceptable noise or disturbance from use of the buildings themselves.
82. Furthermore, I have already noted that it appears that activities associated with agricultural use of the site and camping under permitted development rights would not require planning permission. While the proposal would support the agricultural enterprise and the specific intended activities, I have no firm reason to consider that other agricultural activity or camping could not take place without the proposal. In this context, it is not clear that the development would result in a significant increase in the number of comings or goings to the site or traffic movements, nor a distinct change to the nature of activity over and above that which could otherwise occur on the wider site so as to give rise to materially greater noise or disturbance to neighbouring occupiers. The limited duration of camping under permitted development rights would further reduce the effect of potential noise or disturbance on neighbouring living conditions.
83. Lighting on the site could be controlled by a planning condition to avoid unacceptable harm to dark skies and wildlife in the area, and there is no substantive evidence before me indicating that protected species on the appeal site itself would otherwise be harmed by the development. The discharge of drainage from the site would also be a matter for other regulatory regimes, and I have no firm evidence to demonstrate that the proposal would be likely to unacceptably exacerbate flood risk. Based on the information before me, drainage from the site would not therefore justify dismissal of the appeal.

84. I have considered arguments that the grant of planning permission would set a precedent for other similar developments. However, there is no certainty that this would be the case, particularly given that each application and appeal must be determined on its individual merits which is what I have done here with regard to the specific circumstances of the appeal proposal and the evidence that is before me. The fact that some works on the site were undertaken in advance of an application being made for planning permission is also not a reason in itself to dismiss the appeal.
85. I acknowledge comments regarding the operations and profit levels achieved by other enterprises and smallholdings locally, and that a nearby smallholding including varied ventures does not have a dwelling onsite. However, it is not clear that these examples would be directly comparable to the appeal proposal including in terms of the mix of activities carried out and the number and types of livestock present. They do not therefore alter my conclusions which reflect the particular circumstances of the development that is before me and the evidence put forward.
86. None of the other matters raised by interested parties, either individually or collectively, result in a level of harm that would justify dismissal of the appeal, and they do not alter my findings on the main issues. I have also considered other appeal decisions referred to by the appellants, but they are not determinative given that they each turn on the particular circumstances of the enterprises concerned and the evidence presented. The Council has further commented that many of the enterprises referred to by the appellants have not reached long-term viability, but some have, and whether or not this includes diversified enterprises, I can draw no firm comparisons from the information provided as to whether they would not otherwise have survived.
87. The Council accepts that it is unable to demonstrate a 5 year supply of housing. In accordance with footnote 8 to the Framework, the policies which are most important for determining the application would therefore be deemed out-of-date, and the presumption in favour of sustainable development at paragraph 11d) of the Framework would be engaged. This sets out that planning permission should be granted unless the application of policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
88. The proposal would contribute one dwelling to the supply of housing, albeit for a temporary period, and would help to support a rural business. These benefits would be very limited given the small scale of the proposal, and the contribution to housing supply would be short-term. Nevertheless, the evidence before me does not indicate that the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed. In view of my conclusions on the main issues that there is an essential need for the development and that the character and appearance of the landscape would not be harmed, I further find that the adverse impacts of granting permission would not significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. Framework Paragraph 11d) therefore indicates that permission should be granted.

Conditions

89. The SoCG included an agreed list of suggested conditions which were discussed at the Hearing resulting in some amendments and additions. I have considered (and, where necessary, amended) these in light of the Framework and in the interests of clarity, consistency or brevity.
90. As the development has commenced, a standard time limit condition is not necessary. I have however imposed a condition specifying the approved plans for the avoidance of doubt and in the interest of certainty.
91. A condition restricting the occupancy of the dwelling is required since it is to support an essential need in the countryside where residential development would not generally be permitted. I have also imposed a condition restricting the permission for the dwelling to the temporary three-year period sought by the appellants which is necessary to allow the essential need for it to be reassessed in future following the trial period.
92. Conditions requiring details of the access, provision for vehicle loading, turning and parking including provision for electric vehicle charging are necessary in the interests of highway safety and environmental sustainability. A condition to require details of how construction will be managed is also required in advance of works to the access commencing to safeguard the living conditions of neighbouring occupiers and highway safety. Further conditions to control external lighting on the site and to secure a landscaping scheme are necessary in the interests of the character and appearance of the area and biodiversity.
93. At the Hearing, the Council suggested a condition to remove permitted development rights from the general purpose agricultural building relating to extensions and changes of use to dwellinghouses. This had not been previously identified by the Council as necessary, and I am mindful that the Framework requires that planning conditions should not be used to restrict national permitted development rights unless there is clear justification to do so.
94. Although there is currently insufficient basis for me to conclude that the proposed enterprise would be able to endure for the long term so as to justify a permanent dwelling in the countryside where residential development would not generally be permitted, I am satisfied having regard to my findings on the first main issue that the agricultural building would be reasonably necessary for the purposes of agriculture and essential to its location. I further note that Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) includes a limitation that change of use of agricultural buildings to dwellinghouses is not permitted in the case of a site brought into use after 20 March 2013 if the site was not used solely for an agricultural use as part of an established agricultural unit for a period of at least 10 years before the date development under Class Q begins. Even if that were not the case though, I am not persuaded from the information before me that there are sufficiently compelling reasons why it would be necessary or reasonable in this case to remove national permitted development rights that would otherwise apply to agricultural buildings, and I find that the suggested condition would not be clearly justified. I have not therefore imposed it.
95. Interested parties have also suggested that a condition to prevent use of the site for non-agricultural activities should be imposed. However, a grant of planning permission would be required if there were a material change of use

of land in future, and I do not therefore consider that such a condition would be necessary. The fact that the wider site could already be used for grazing in the absence of the appeal proposal also means that I do not consider a condition to require installation of stock fencing on the wider site would be reasonable.

Conclusion

96. For the reasons given above, I find that the proposal would accord with the development plan when it is read as a whole, and material considerations do not indicate that a decision contrary to the development plan should be reached. I therefore conclude that the appeal should be allowed.

J Bowyer

INSPECTOR

Schedule of Conditions

- 1) Unless otherwise amended under the conditions below, the development shall be carried out in accordance with the following approved plans: MH-JH-01 (Location Plan), MH-JH-02A (Block Plan), MH-JH-03 (Floor Plan & Elevation of the Proposed Mobile Home) and MH-JH-04 (Floor Plan & Elevation of the General Purpose Building).
- 2) Full details and plans in respect of the access arrangement shall be submitted to and approved in writing by the Local Planning Authority within 2 months of the date of this permission. The submitted details shall include:
 - i. provision for and maintenance of visibility splays to the access to the site of 91 metres (north) x 2.4 metres x 56 metres (south) with no obstructions over 1.05 metres above carriageway level;
 - ii. details of gates which shall open away from the highway and be set back a minimum of 10 metres from the edge of the carriageway;
 - iii. use of a bound surface for the first 10 metres of the access from the edge of the highway; and
 - iv. provision of measures to prevent the discharge of surface water onto the highway.

The access shall be implemented in accordance with the approved details before the development hereby permitted is first occupied, and shall be permanently maintained as such thereafter.

- 3) Prior to the commencement of works in respect of the general purpose agricultural building or the occupation of the mobile home as a dwelling, whichever is sooner, details and plans demonstrating vehicle loading/unloading and turning facilities within the site shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and plans before the development hereby permitted is first occupied and permanently maintained as such thereafter.

- 4) Prior to the commencement of works in respect of the general purpose agricultural building or the occupation of the mobile home as a dwelling, whichever is sooner, details and plans demonstrating vehicle parking spaces within the site shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and plans before the development hereby permitted is first occupied and permanently maintained as such thereafter.
- 5) Prior to the commencement of works in respect of the general purpose agricultural building or the occupation of the mobile home as a dwelling, whichever is sooner, details and plans demonstrating provision of an Electric Vehicle Charging Point shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and plans before the development hereby permitted is first occupied and permanently maintained as such thereafter.
- 6) Prior to the commencement of works in relation to the access arrangement as approved under Condition 2, a Construction Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Construction Management Plan shall include the following:
 - i. routing of construction and delivery vehicles to/from the site;
 - ii. parking and turning areas for construction and delivery vehicles and site personnel;
 - iii. provision of wheel washing facilities; and
 - iv. temporary traffic management/signage.

The development shall be carried out in accordance with the approved details.

- 7) There shall be no external lighting installed on the site other than in accordance with details which have first been submitted to and approved in writing by the Local Planning Authority. Details shall include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles). The approved scheme shall be installed, maintained and operated in accordance with the approved details.
- 8) A landscaping scheme to include details of new planting, retention of existing planting or a combination of both on the site and wider site as shown outlined in blue on plan no MH-JH-02A shall be submitted to and approved in writing by the Local Planning Authority within 3 months of the date of this permission. Thereafter, all details of the approved landscaping scheme shall be carried out fully within a period of 12 months of the substantial completion of the agricultural building hereby permitted. Any trees or other plants which within a period of 5 years from the date of approval die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species.
- 9) The mobile home hereby permitted shall be for a limited period being the period of 3 years from the date of this decision. On or before the expiry of this period, the use of the mobile home hereby permitted as a dwelling

shall cease, and all buildings, structures, materials and equipment brought onto, or erected on the land, or works undertaken to it in connection with the use of the mobile home shall be removed, and the land restored to its former condition.

- 10) The occupation of the temporary mobile home hereby permitted shall be limited to a person solely or mainly working in the locality in connection with agriculture or forestry (as defined in Section 336 of the Town and Country Planning Act 1990), or to the spouse, a widow or widower or surviving civil partner of such a person, and to any resident dependants.

APPEARANCES

FOR THE APPELLANTS:

Howard Leithead	Barrister, No 5 Chambers
Marc Willis	Willis & Co
Peter Williams	Reading Agricultural Consultants
Jaquelin Clay	JFA Environmental Planning
Mark Homewood	
Tess Reidy-Wilde	

FOR THE LOCAL PLANNING AUTHORITY:

Olawale Duyile	Ashford Borough Council
Helen Whitehead	Price Whitehead

INTERESTED PARTIES:

Estrella Guy	Local resident
Linda Harman	Councillor, Ashford Borough Council
Matt Judge	Judge Architects
Dr H Stebbings	Local resident
Christine Stebbings	Local resident

DOCUMENTS SUBMITTED AND ACCEPTED AT AND AFTER THE CLOSE OF THE HEARING

ON BEHALF OF THE APPELLANTS:

- 1 Maidstone Borough Council planning decision notice and report for application ref 15/506408/FULL for 'change of use of land for the siting of a mobile home' at Heinz Orchard, Wierton Hill, Broughton, Monchelsea, Kent.
- 2 Maidstone Borough Council planning decision notice for application ref 19/501787/FULL for 'erection of permanent agricultural dwelling' at Heinz Orchard Farm, Wierton Hill, Broughton, Monchelsea, Maidstone, Kent.

- 3 Copy of article from MailOnline dated 21 August 2022 'Moment masked burglars creep around mobile home at alpaca farm after smashing their way in before they steal 100-year-old machete'.
- 4 Copy of updated alpaca stock tables (Year 1, Year 2, Year 3, Ongoing) prepared by Mr Williams and marked up at the Hearing.
- 5 Copy of extract from Llamas and Alpacas: A Guide to Management by Gina Bromage concerning pregnancy loss quoted by Mr Williams at the Hearing.
- 6 Copy of extract from the website of The British Alpaca Society referred to by Mr Williams at the Hearing concerning the age at which female alpacas are ready to be put to stud.

ON BEHALF OF THE LOCAL PLANNING AUTHORITY:

- 1 Screen print of 'Property History' showing applications made at Heinz Orchard, Maidstone.
- 2 Copy of Animals on Farm stock table (Year 1, Year 2, Year 3, Year 4, Year 5) prepared by Mrs Whitehead and marked up at the Hearing.