

# CHAPTER 7

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**INDEPENDENT ASSESSMENT  
OF ASPECTS OF THE LAMMAS PLANNING APPLICATION  
AND THE REASONS FOR REFUSAL CITED BY  
PEMBROKESHIRE COUNTY COUNCIL PLANNING AUTHORITY**

**November 2008**

Chapter 7 has been asked by Lammas to provide an independent assessment of a number of aspects of their application, and the reasons for refusal cited by planning officers in their report to the Planning and Rights of Way Committee on 9 September 2008, specifically on the following matters:

- Criterion 2, Bullet point 5: Reversibility
- Criterion 2, SPG Bullet Point 6: Scale
- Criterion 6: Three Years or Five Years
- Criteria 6 and 7: Part-time Work
- Criterion 7: Man-Hours

## **About Chapter 7**

1.1 Chapter 7 is a voluntary organization whose aim is to provide "access to land for all household . . . through environmentally sound planning" — a quote from Chapter 7C of Agenda 21 of the Rio Earth Summit 1992. It was established in 1999, with two main functions: to provide advice on planning matters to smallholders, small farmers, low impact settlers, caravan and shack dwellers and other low income people in the countryside; and to lobby for policies which would provide for the needs of these people. We deal with about 700 enquiries for advice a year, from people in England and Wales. After the South West of England, Wales is the area where we receive most enquiries from.

1.2 Chapter 7 has acted as a consultant to the reports on LID in Wales by UWE/Land Use Consultant and by Baker Associates; has given a presentations on Low Impact

Development to the Planning Inspectorate's annual meeting; and is responsible for the following relevant publications:

*Low Impact Development*, Simon Fairlie (Jon Carpenter publishing) 1996

*Defining Rural Sustainability: 15 Criteria for Sustainable Developments in the Countryside, Together with Three Model Policies for Local Plans*, The Rural Planning Group, TLIO, 1999.

*Sustainable Homes and Livelihoods in the Countryside: Suggestions for the Forthcoming Revision or Replacement of Planning Policy Guidance 7*, Chapter 7 and the PPG7 Reform Group, 2003.

*Low Impact Policies for Local Development Frameworks*, Chapter 7, 2007.

1.3 This assessment has been prepared by Simon Fairlie, founder and co-ordinator of Chapter 7. Simon Fairlie is a former editor of *The Ecologist* magazine, current editor of *The Land* magazine, and has worked for 10 years as an agricultural labourer and builder and 10 years as a smallholder.

## **Criterion 2 , SPG Bullet Point 5: Reversibility**

2.1 The fifth bullet point of Criterion 2 in the Supplementary Planning Guidance is as follows:

“The project must be reversible, insofar as new buildings can be easily dismantled and the land easily restored in the event of the collapse of the project.”

The planning officer's report states:

“The buildings are a variety of different structures some of a more traditionally low impact style such as roundhouses but most of the residential buildings, and the community hub, are designed to be permanent structures requiring outside professional help in their construction. They are described as being reversible in that they can be removed and the land restored to its previous state, but this can be said of almost any building. Pembrokeshire County Council's Supplementary Planning Guidance Building in a Sustainable Way (5<sup>th</sup> December 2005) requires all buildings to be constructed with sustainability in mind. For a building to be considered low impact it should go beyond those standard requirements. The amount of labour, materials, time, and permanent nature of some of the buildings proposed by Lammas suggests that they may not necessarily be considered low impact.”

2.2 There are several concepts which risk getting a bit muddled up here, and it is important to define them correctly.

- *Reversibility* (which is what the bullet point is concerned with) is the ease with which a structure can be removed, or a site can be restored back to its original condition. Reversibility tends to be easiest with organic materials, and small scale earth constructions, and hardest with certain manufactured materials, notably concrete, and where there has been large scale earthmoving.

- *Reversible* is not the opposite of *permanent*. Permanence is the ability of a building to be maintained for a long period of time, which is not the same as the ease with which it can be dismantled or removed and the site restored. For example a dry stone wall is at least as permanent as a wall constructed with stone and cement mortar (probably more permanent

since cement can absorb water, expand and crack in frost) but a dry stone wall can be dismantled much easier. A wooden structure which is bolted together and can be dismantled in panels, is likely to last longer than a pole barn where boards are nailed to posts cemented in the ground.

- *Temporary* is the opposite of permanent, and means designed for a short life. It can apply either to a structure or to a permission. It is possible to give temporary permission to a permanent structure (the Millennium dome is an example); or permanent permission to a very temporary structure, as in a caravan or camping site.

- *The amount of labour, materials time* (ie the investment) is not an indicator of *reversibility*, or of *low impact*; it is more usually an indicator of (a) the quality of the construction; and/or (b) its size. Often it takes more time and investment to make a building more easy to dismantle. A wooden structure which is bolted together and can be dismantled in panels, is likely to cost more than a structure where timbers and boards are hastily nailed to posts sunk in the ground.

- *Reversibility* is widely regarded as being a possible indicator of *low impact development*, but it is not an essential element. I have been centrally involved in the evolution of criteria for LID, including those used in Policy 52, and it maybe worth tracing this evolution in some detail.

2.3 The concept of low impact development was introduced during the mid-1990s by a number of theorists. My own book, *Low Impact Development, Planning and People in a Sustainable Countryside* advanced 9 criteria to define low impact development. Within this initial document "Temporary" as a criteria was described as "only beneficial in certain cases". One of the five case studies I used as an example of low impact development was Hockerton Housing Project, which is an earth sheltered, 5 unit terrace involving substantial earthworks and reinforced concrete foundations and as such is not "temporary". It was opened by the housing minister Nick Raynsford in 1998, and has been hailed since then for pioneering best practice in this field.

2.4 As the idea and practice of low impact development has been further refined a consensus has emerged that temporariness should not be part of the required criteria, while reversibility is a desirable, but by no means essential indicator. I was a member of The Rural Planning Group which, in a document entitled *Defining Rural Sustainability*, produced a more extensive list of fifteen criteria to define low impact development in 1999 (The Rural Planning Group, 1999). This document is drawn upon directly within the SPG, e.g. footnote 12, p.13, and criterion 9 from *Defining Rural Sustainability* has clearly formed the basis for the SPG wording quoted above (point 5) since it reads:

"The project is reversible, insofar as new buildings can be easily dismantled and the land easily restored to its former condition."

2.5 When the Rural Planning Group drew up the 15 criteria, we spent a considerable amount of time discussing the issues surrounding reversibility, and our commentary on Criterion 9 provides important guidance on how reversibility should be approached when assessing low impact developments:

"Reversibility in the event of collapse of a project or upon its completion does not feature highly as an indicator of sustainability in international agreements or in Government guidance. However an obligation to restore land after use is a common feature in minerals applications; and a temporary three year trial period for residential developments associated with new agricultural or forestry enterprises is required by PPG7.

“In practice, this criterion principally guarantees that there will be no extensive earthworks, foundations, areas of concrete, roads or other heavy infrastructure associated with a proposal which might be viewed as experimental or prove to be short-term. However there may well be elements of a project which, although they are relatively permanent, are judged to be of long-term benefit or very minimal impact to the environment or landscape - the excavation of a pond or the construction of an earth-sheltered building, for example. In such cases non-adherence to this criterion should not be taken as an indication of unsustainability.” The Rural Planning Group, 1999, p 12.

In other words there may be a conflict between maximizing a building’s sustainability performance and its reversibility. When such a conflict occurs it is entirely reasonable to maximize sustainable and low impact performance.

2.6 One example of this can be found when considering the concept of thermal mass. Thermal Mass is one technique that green buildings use to store heat when it is readily available (for example solar heat during a winter’s day when the sun is shining) so that it can be released when it is needed (for example on a winter’s evening). Thermal mass is one of the best examples of best practice sustainable design, reducing the need for external heating and thus reducing a buildings impact. It is, however, as its name suggests, massive by its nature. To support such weight requires foundations which satisfy building regulations. Other examples where best practice sustainability and minimizing impacts may conflict with reversibility include turf roofs, masonry stoves and accumulator tanks (used to store hot water). Each of these examples are currently used within low impact schemes with planning permission in England and Wales.

2.7 This application strikes a balance between creating dwellings that will perform to the highest environmental standards and structures that can be easily dismantled with the land being restored to its former condition. The application is exemplary in this respect in that its total impact will be amongst the lowest of any development in the UK. For example, thermal mass in the buildings will be achieved through the use of rammed earth and clom, a technique traditional to Pembrokeshire, rather than through the use of concrete, for example. Such an approach not only has a far lower embodied energy impact, it also renders the scheme more reversible.

## **Criterion 2 , SPG Bullet Point 6: Scale**

3.1 The sixth bullet point from the SPG section on Criterion 2 states.

- **The development must be of a scale no greater than is necessary to meet the needs of the development.**

The commentary in respect of this in the committee report is as follows.

“The scale of the proposal is ambitious and Lammas claim it is necessarily so in order to prove that low impact development can work. However the scale of the proposal in terms of its activities and building proposals are demonstrably beyond the capacity of the residents and cannot be said to meet the above requirement. As mentioned, under criterion 1, providing local employment is a legitimate benefit but the proposal is close to a small village which is unlikely to be able to supply all the labour required. Employees will most likely need to commute some distance to work, probably by car, increasing trip generation and putting further pressure on the local road network. Also there appears to have been limited effort to minimise the amount

of structures on the site by sharing workshop, storage and polytunnel space, although some concession has been made to reduce the number of buildings through the terrace design and food preparation area at the hub.”

This bullet point clearly relates only to the matter of whether the scale of the development is related to **its own** needs, not to that of society. The latter would normally be addressed under Criterion 1 of the policy.

3.2 Sentences three and four of the commentary from the committee report, however, relate to the impact of the development upon society, and this is acknowledged by the fact that sentence three starts with the words: “As mentioned under criterion 1”; so I am not clear why these sentences are here under criterion 2. In any case, the response from the County Council Highways Development Control Officer makes it clear that the traffic arising from outside employment is not a problem.

3.3 The scale of the development *taken as a whole* results primarily from the fact that it is designed to accommodate and provide a workplace for nine households. Criterion 8 of Policy 52, states:

“In the event of the development involving members of more than one family, the proposal will be managed and controlled by a trust, co-operative or other similar mechanism in which the occupiers have an interest.”

The policy therefore clearly anticipates multi-household developments. Elsewhere Lammas have explained how the ethos of project relies upon a number of independent households co-operating together. If there were not a collective project such as Lammas, then these families would be likely to acquire separate smallholdings dispersed around the locality — Chapter 7 deals with hundreds of such isolated smallholdings in Wales and England every year. There are enormous advantages to be gained from clustering, in terms of shared facilities and reduced transport for commercial transactions, school trips and entertainment. It is precisely for these reasons that residential clustering is a fundamental tenet of modern sustainable planning policy.

3.4 By housing project standards, even rural ones, nine units is not massive. Nonetheless a cluster of nine agricultural smallholdings will have an impact on Glandwr, which is a community of 76 households in a fundamentally agricultural area. There is, however, no reason why this should have any more impact upon Glandwr, than the impact that a commensurately larger conventional housing development, together with a small employment estate and a community centre, might have at the edge of a key village — and in terms of traffic, utility infrastructure and some other impacts it will be a lot less. For very good reasons, the planning system does not insist that conventional houses and businesses should be dispersed around the countryside in order to alleviate the impact on key villages, and equally it makes sense to cluster agricultural smallholdings in rural areas where they can help to regenerate an agricultural economy that is in decline.

3.5 The other matter — the one which the bullet point specifically seeks to address — is whether any or all of the individual ploholders are proposing development on a scale which is not necessary to meet their individual needs. There are three main forms of development proposed by individual ploholders, (i) dwellings, (ii) agricultural buildings (iii) polytunnels and greenhouses. I also have some observations to make about the dispersed siting of these structures.

#### **(i) Dwellings**

3.6 The total external footprint of dwellings at Lammas is 1563 square metres, which is an average of 174 square metres. However, this includes a number of outbuildings used for work activities; only two buildings have two stories; and all of the dwellings use straw bale walls of up to 60cm thickness for insulation. The internal floor area is therefore considerably reduced. The overall internal domestic floor space is 1175 square metres, which is an average of 131 square metres per dwelling.

3.7 This is slightly less than the maximum size for a thin skinned caravan, which is 136 square metres (Caravan Sites Act 1968, as amended in SI 2007 No. 3163 W.274). A caravan is a specified form of temporary accommodation on conventional agricultural holdings (where dwellings are expected to be “of a size commensurate with the established functional requirement”), along with easily dismantled wooden buildings subject to no particular size limit.

3.8 Moreover, the purpose of the advice in TAN 6 to restrict the size of agricultural buildings is in order to ensure that they remain affordable to future buyers, and do not become stripped of their agricultural function because they are too expensive for someone making their living from an ill-paid but essential occupation. There is no danger of this occurring because the transfer takes place under the aegis of Lammas management.

3.9 In this light, I do not think it can be argued that the dwellings at Lammas are excessively large.

#### **(ii) Agricultural Buildings**

3.10 I calculate the overall area of all the agricultural buildings, excluding polytunnels and movable chattels such as pig arks, to be 1188 square metres, or an average of 132 square metres per plot. To put this into context, the maximum size allowed through permitted development rights on a holding larger than 12 acres (five hectare) is 465 square metres. The Lammas plots only average 8.44 acre, and therefore are not eligible for Class A permitted development rights. However if they were to double up, there would be 4 plots of over 12 acres, plus one plot left over, theoretically eligible between them for four agricultural buildings of 465 square metres. By contrast, the proposed coverage of 1188 square metres is the equivalent of 2.5 buildings of 465 square metres.

3.11 This is nonetheless a fairly large amount of agricultural building for a total area of 76 acres. On the other hand it is a very modest amount of agricultural building for a farm that supports 9 households. There are plenty of farms in the UK which have over 465 square metres of outbuildings, yet which support only one family. I do not consider 132 sq metres of outbuilding to be at all excessive for one family earning its living through agricultural, land-based and ancillary activities. Indeed if it were lower one might be concerned at the lack of “significant investment in farm buildings” which TAN 6 cites as an indicator of a firm intention to farm profitably.

#### **(iii) Polytunnels and greenhouses**

3.12 Each of the plottolders has between one and three polytunnels or greenhouses, ranging in size from 13 square metres to 150 square metres. I calculate the total area of polytunnel/greenhouse to be exactly 1200 square meters, an average of 133 square metres per plot. This is very nearly the same as the area of agricultural building. However three of the plots have over 200 square metres, while plot 8 has only 41 square metres and plot 2 only 13.

3.13 The question of whether the polytunnel/greenhouse development is “of a scale greater

than is necessary to meet the needs of the development” does not arise because the existence of polytunnels creates these needs. A polytunnel or greenhouse increases the productivity of the agricultural land it covers by a factor of at least three, and hence generates greater needs in respect of tool storage, packing areas and the like.

#### **(iv) Dispersal**

3.14 I sympathize with the planning authority’s concerns about dispersal and duplication of function when it observes: “There appears to have been limited effort to minimize the amount of structures on the site by sharing workshop, storage and polytunnel space.” I made similar observations when I was asked to assess the initial applications from prospective smallholders. As the planning authority acknowledges, “some concession has been made to reduce the number of buildings through the terrace design and food preparation area at the hub”.

3.15 One of my suggestions was that some of the animal management could be combined with a view to reducing the amount of fencing and possibly stabling. Mr Wimbush looked into this, but after consultation with the Animal Health Division Office at Carmarthen he concluded that it was not possible because of the constraints of animal movement orders, which mean that every time an animal moves onto another holding it has to stay there for 6 days. I phoned up Caroline King of the Animal Health Division Office to find out whether this was the case with common grazing, since it is presumably possible to take dairy cows on and off commons to milk them. She kindly established that there is indeed a derogation for this under current legislation, provided the shared land is a commons registered under the Commons Registration Act 1965. However it is extremely difficult to get new land registered as a common under this Act. It therefore seems that each of the holdings is legally obliged to manage its own animals separately from other holdings.

3.16 The sharing of polytunnels, in particular, would have a benign effect upon visual impact. However sharing would very likely lead to differences, or even disputes, about how the polytunnel should be managed in respect of temperature control and possibly other factors. Several of the plots choose to have two or even three polytunnels, rather than one big one, presumably because they can be subject to different management regimes, or because a smaller polytunnel is cheaper to heat. On top of this it is inconvenient to have polytunnels sited a long distance from compost heaps, and toolsheds. In one case a substantial greenhouse is attached to a dwelling, for energy conservation reasons. I therefore think it unreasonable to expect different plots to share polytunnels and greenhouses.

3.17 Whilst I can understand why the local authority planners should be concerned about the number of agricultural structures, they should bear in mind that if it were not for the Lamma development, these holdings with their agricultural buildings would in all likelihood be dispersed around the county. For a number of economic, land use, and sustainability reasons it is surely better to cluster them all in one place.

### **Criterion 6 , Three Years or Five Years**

4.1 Criterion 6 states in respect of the viability of the holding, that “the LPA will expect this to be achieved by year 3 of the project. If achieving this requirement of 75 per cent of needs being met on site in this time scale is considered unreasonable, given the nature of the project proposed, then this must be explained in the supporting documentation submitted with the application.”

I submit that in this case the period of three years is inadequate, for the following reasons.

4.2 The period of three years is the same as that given in Annex A of PPS7, which is derived from the 1997 version of PPG7, from which the guidance in TAN6 is derived, almost word for word. Chapter 7 was involved in the consultation process for PPG7. The consultation draft stated:

“If a new dwelling is essential to support a new farming activity, whether on a newly created agricultural unit or an established one, it should for the first five years be provided by a caravan or other temporary accommodation.”

4.3 The period of five years was replaced in the final version by the period of three years. At the time it was generally supposed to have been altered in response to submissions by the representatives of the established farming industry, who stood to benefit from an earlier realization of the asset of a permanent house. It was certainly not in response to submissions from the environmental lobby, since the Council for the Protection of Rural England actively supported the period of five years. That is how this period of three years has found its way into Welsh guidance, and presumably into Policy 52.

4.4 My view is that a new farming activity on an existing farm is likely to require less time to set up than it takes to establish an entirely new farm, indeed I would have thought this was common sense. It clearly takes far less time, for example, to set up a calf-rearing operation on a beef farm which is already fully equipped with a farmhouse, barns, stock sheds, silage clamps, tractors, water and electric systems and so on, than it does to set up a calf-rearing operation on a bareland holding where all these facilities have to be built from scratch.

4.5 There has been some recognition of this from planning authorities and appeal inspectors granting permission for new enterprises on bareland holdings. Tinker’s Bubble, a low impact community in S Somerset was given temporary permission in 1999 for five years (even though to conform with the policy they had only asked for three) because the committee viewed that it would take five years to reach the financial targets. Steward Wood in Devon was given five years to prove itself by an appeal inspector, a period confirmed in a 2003 High Court judgment. Fivepenny Farm, a Dorset smallholding operated by two families was given four years, by an appeal inspector in 2005.

4.6 ADAS, in their appraisal of Lammas’ data do not argue for three years but accept the five year projections without comment; they also observe that the soil will not start to show real improvement until about year four.

4.7 The local authority, in their commentary on Criterion 6 in the report to the committee states that “there appears no justification for observing the land [for the first year] or delaying the horticultural and other land-based activities in favour of an initial construction phase.” Observing the land for a year, with only low level maintenance, is standard permaculture practice. My own experience as a smallholder is that, providing there is sufficient capital, it is far better to concentrate on getting the bulk of the infrastructure completed in the first year, with minimum attention to land management, so as to be able to devote most of one’s attention in subsequent years to production — rather than scrabbling around in the first year trying simultaneously to create the infrastructure that is necessary for efficient production and to produce goods without that necessary infrastructure in place.

4.8 The Lammas settlers, in my view, are to be commended for making a realistic assessment of the time scale necessary to establish their holdings, rather than trying to squeeze everything into the recommended period in order to comply with the policy. To allow the

application with a three year time limit which Lammas admits it cannot make would be stupid; the project should be allowed, or rejected, on the basis of the five year period it has proposed.

### **Criteria 6 and 7 : Part-time Work**

5.1 The planning officers' report to the committee also cites part-time work off-site carried out by some residents as a cause for "doubt that the proposal will provide sufficient livelihood, and substantially meet the needs of residents".

5.2 But part-time work is not in itself a cause for doubt. The fact that 75 per cent of income is required from land based use means that 25 per cent part-time work is permissible. Moreover the 75 per cent figure only has to be achieved by the target year whether that be year 3 or year 5. It is entirely acceptable, and indeed normal under the standard agricultural worker's dwelling policy for applicants to take part-time work off site while they are establishing the holding with a temporary permission — there is nothing in either PPS7 or TAN 6 to say they can't. Similarly there is nothing in Policy 52 which regulates the level of part-time work during the temporary period.

5.3 Mr Wimbush kindly furnished me with a chart of the amount of part-time work envisaged by the ploholders, which is as follows:

Plot 1: one adult lives and works off-site for first year

Plot 2: one adult takes on occasional freelance work in years 1 - 3

Plot 3: one or possibly both adults take on part time work in years 1 - 3. Thereafter one adult working one day a week off site.

plot 4: one adult approximately one day a week, ongoing.

Plot 5: both adults work 2 days a week off-site for additional income in years 1 - 3

Plot 6: one adult working off-site up to 40 days in a year, ongoing.

Plot 7: one adult working 3 days a year off-site for years 1 - 5

Plot 8: years 1 - 5, one adult one day a week and one adult one day a fortnight. Thereafter one adult one day a fortnight.

Plot 9: could possibly need some part-time off-site work to supplement income.

None of the above constitutes an excessive reliance upon part-time work off site, during the initial trial period — and thereafter, in terms of time allocated it amounts to nowhere near 25 per cent of a working year. I submit that the amount of part-time work envisaged casts no doubt whatsoever upon the ability of the proposal to meet the 75 per cent target.

5.4 The presence of part-time work is also the only reason given in the report to the committee why the functional need is not met, under the heading Criterion 7. The report states:

"The Plot 3 management plan suggests that one adult will work on site with the other continuing to work with the Welsh Assembly Government for three years, becoming resident at a later date. This suggests that there may only be a functional need for one adult on the plot and not two."

5.5 It doesn't suggest anything of the sort. It is highly likely that the other partner will be coming to work on site because a functional need for a second person has been built up as the enterprise expands. As I have explained above, it is entirely normal for a holding to be partly sustained by part-time work while it is being established and especially where money is required for initial capital investment.

5.6 In any case there are over 100 hours a week available to the smallholder who lives on site and so it is easily possible for a couple to carry out two full time jobs on the land, and pursue another third full-time job unrelated to the holding. A very large number of farming families do this, and it is entirely acceptable under paragraph 41(b) of TAN 6 and under the standard agricultural occupancy condition, provided the farmer is working full time on the farm, and “primarily employed in agriculture.” I see nothing in Policy 52 that prevents this, provided that the returns from the farming activity supply 75 per cent of basic needs (which is not the same as income).

### **Criterion 7 : Man-Hours**

6.1 I have read the ADAS *Assessment of Data*, but regrettably neither I nor Chapter 7's agricultural expert have had the opportunity to respond to it in detail. ADAS cite some figures from the business plans which at first sight strike me as over-optimistic, and which Lammas need either to justify or to rectify; but I am not in a position to scrutinize these properly.

6.2 I do however have time to remark on one very blatant failing in the ADAS analysis. The use of MAFF standard man hour data to assess smallholders labour requirements is simply ridiculous. Since numerous smallholders have been given permission in the face of evidence of this kind, the ADAS consultants by now ought to know better than to cite them here. They do, in respect of plot 1, try to cover themselves by stating “even if considerable allowances were made for the micro-sizes of the enterprise, it is difficult to see how more than one person would be needed on the enterprise.”

6.3 I am not in a position to make a complete analysis of the tables for functional need supplied by ADAS for each plot, but I can give one example of how ludicrous they are. In respect of plot 6, which rears two milking cows, ADAS states that 60 hours per year are required per animal, 120 hours in all. The figure of 60 hours is no doubt fairly accurate for a herd of 100 beasts, run through a modern milking system. But I have kept two milking dairy cows for over 5 years, and I can assure him it takes far longer than 60 hours. It takes at least 10 minutes to hand milk a cow, often 15 minutes if you want to strip her out properly. On top of that you have to bring in the cows, feed them, wash and dry their udders, give them a health check, put them out again, deliver the milk to where it must go and see that it is cooled, and wash all the equipment. The whole business takes at least 30 minutes, more like 45, and you normally do it twice a day, for ten months of the year. That on its own is 75 minutes a day, or 375 hours a year. On top of that you have to process the milk, sell or deliver the goods, manage the grass, make hay or silage, deal with sickness, pare hooves, bring in the bull, attend to calving, manage the calves and followers, provide and repair fencing, maintain and muck out cow-houses and fill in the required forms. It is a total fantasy that this can be achieved in 120 hours a year. My rule of thumb for two productive dairy cows, including milk processing and land management, is three hours a day, or 1000 hours a year.

6.4 That volume of work might suggest that two dairy cows are supremely unviable, but that is not necessarily the case. Whereas the farmer who produces half a million litres of milk a year and devotes only 120 hours per year to each cow frequently makes only a penny or two on each litre of milk, two low-yielding dairy cows, producing only 7,000 litres of milk a year between them, provide cheese, organic milk or yoghurt worth in the region of £7,000 retail. If the farmer is selling direct, with low overheads, this equates to something in the region of minimum agricultural wage.

6.5I could make much the same analysis for the assumption, in the ADAS analysis of plot

1, that a sow requires only 36 hours work per year (six minutes per day!). Smallholders with experience with other livestock and crops will no doubt make similar observations. The fact is that these figures reflect the output of industrial farmers using high tech machinery and selling to supermarkets and wholesalers, and bear no relationship whatsoever to the performance of smallholders selling direct to the public or producing for their own consumption. It is a constant wonder to me that ADAS and other agricultural consultants who habitually work for local authorities continue to wheel these formulae out when they must know by now how wide of the mark they are for micro-producers.

## Conclusion

7.1 Working as I do at Chapter 7, where I provide a free planning advice service, I know what a large and increasing demand there is for the kind of lifestyle that Lammas caters for. If there are continuing economic problems of the kind we have witnessed over the last year, I fully expect this demand to grow.

7.2 Up till now this demand has been met largely haphazardly through individuals and families establishing smallholdings willy nilly, wherever an appropriate and affordable patch of land becomes available — resulting in a dispersed pattern of smallholding development that has not been thought through with a view to sustainability. This is mainly because there has been no provision for this kind of need through the planning system. Pembrokeshire council are to be applauded for attempting to establish a working policy to meet this need; and Lammas are to be applauded for their pioneering attempt to site a number of smallholdings in a cluster, with all the economic, social and environmental benefits that derive from proximity.

7.3I also welcome the level of scrutiny that the planning authority is giving to this application, which may seem excessive to the applicants, but is no more than is habitually given (or at least ought to be given) to applications for multiple housing developments. However I can also understand the frustration of the applicants when the application is repeatedly refused and has to be amended or sent to appeal. Housebuilding firms expect their developments to take an average of 5 years (according to Kate Barker) from outline permission to commencement of construction, and structure their land banks accordingly. The people who are involved in this project cannot afford to wait five years, and want to get on with their lives. In this respect, the failure of both parties to respectively require and submit a disability access statement is to be regretted. The greater part of the responsibility in my view rests with the local authority, who should have known better, and I sincerely hope they are not demanding additional fees for the resubmission.

7.4 However, hopefully, this cock-up could prove to be a blessing in disguise. If it enables Lammas to identify and rectify whatever deficiencies there may have been in the first application, and the local authority to come to a better understanding of the proposal's merits, then it may be that it can be passed at local authority level, dispensing with the need for an appeal.

7.5 I have read through much, though not all of this application, including everything I have deemed that might be relevant to the matters I have been asked to comment on. These are my conclusions:

- In my view, the planning officers concerns about the reversibility and the scale of the project are unfounded, and result from an understandable unfamiliarity with this kind of development.

- I understand the planning officers' concerns about the dispersal and duplication of buildings, but consider that Lammas have probably done what they can to address this given the nature of the development, the needs of the enterprises and the legal constraints about animal movements.

- I do not consider the level of part-time work envisaged to constitute a threat to the target of achieving either the target of 75 per cent of basic needs, or to meeting the functional requirement for each adult to carry out full-time activity on site.

- The standard man hour figures used by ADAS are relevant to industrial scale production, and are wholly inappropriate for this kind of holding where both the labour input and the financial returns per unit of production are far higher.

- The period of five years is a much more appropriate time-scale for assessing a development of this kind on a bareland holding than three years.

- Chapter 7 has not had time to assess the criticisms made about excessively optimistic yields by ADAS, and in any case I gather an organic agricultural expert from Elm Farm is going to make an appraisal.

7.6 If Lammas' submissions about yields and productivity are upheld, or alternatively their targets are adjusted to compensate for any mistakes, I can find no other valid reason cited by the local authority for rejecting the application. I am therefore optimistic that this groundbreaking proposal can be given consent when it next comes before the committee.