

06/01/2024

California farm

Chaddleworth,

West Berkshire

RG20 7HR

Dear Roger

Planning Application 24/01203/FUL Manor Farm, Pound Lane, Yarlington BA9 8DG

Thank you for contacting me to seek my views on the above planning application and to address your concluding agricultural questions raised in your report dated 24th July 2024 being:

- A. Is there a requirement for the livestock enterprises to be grouped together, thereby requiring a larger set of buildings?
- B. Could the existing farmyards be redeveloped with modern farm buildings, where necessary, rather than building on a new site?
- C. Is the proposed design suitable and viable without a financial business case?
- D. Is the proposal sustainable without on-site rural workers' dwellings for key workers to be available to attend to the livestock's animal welfare?
- E. Is building on Grade 1 land essential when there are alternative solutions?

I have been involved in practical farming for 35 years. I have an HND in Agricultural Management with an emphasis on Livestock and Dairy. I have done various CPDs with Certificates in Agricultural Management, regenerative soil management, and feeding ruminants in grass-based systems. Over this time, I have consulted and advised on organic farming and environmental schemes, as well as environmental compliance with SSAFO and FRfW regulations.

However, more specifically, I have 20 years' experience in advising on and managing buffalo. I was involved with Laverstoke (the previous location of the buffalo herd, subject to this application) as a consultant, where I helped the Estate buy stock and manage various herds, they kept on contract farms. I also contract reared approximately 250 male buffalo a year on my own holding for Laverstoke.

In response to Rural Solutions' rebuttal to your report, I comment as follows:

- A. **Is there a requirement for the livestock enterprises to be grouped together, thereby requiring a larger set of buildings?**

Rural Solutions has advised that *"The co-location of dairy and suckler herds, breeding and youngstock is a positive decision from farm owners and managers to create a 'best in class' mixed and integrated livestock unit that provides optimal animal and team welfare and operational efficiency whilst being fit for purpose and fit for the future. It should be applauded in both ambition and design"*.

For some farms, centralising feed and labour storage has merits, but I sincerely question this approach where buffalo are kept as a dairy enterprise alongside the conventional suckler herd. I would be concerned if the separate groups ever got mixed up.

There would need to be a clear spatial and inter-visibility separation with animals in separate buildings with no risk whatsoever of groups getting together when being moved within the unit. Buffalo can quickly become stressed when there are changes to their routine and environment. This stress leads to agitation, and the animals' defence mode is aggression. If there was an incident of the suckler cows getting mixed with the buffalo, it is highly likely buffalo would attack the cows, causing severe injury. Separating them would cause serious H&S issues for staff and this would not be easy.

Therefore, Rural Solutions' implication that the beef animals (weaned suckler beef and buffalo calves) would be housed together would not work in my experience. The diets for these breeds would also be quite different. For example, to get the British Whites finished by 24 months, a higher nutritional diet would be required than for rearing buffalo.

It is noted that Rural Solutions are advising that the Estate's *"approach by providing housing for most animals at one site....is a view shared by the farm's vets and the Government TB advise team who carried out an on-farm TB risk report in 2023"*. It would be helpful to see this advice, as in my experience, if the farm had a TB outbreak, it would not matter if they were at different parts of the farm. All would be shut down. However, it would be easier to control the spread of any disease, including TB, if they were not all on one site. Dairy farmers often structure their holding to have different holding numbers, so if their dairy unit is closed with TB, it does not necessarily mean their beef-rearing unit is as well. Therefore, as you have highlighted in your report, it is common agricultural practice, when building space allows, for livestock farmers to rear youngstock away from the main dairy herd.

I am concerned that Rural Solutions is advocating that all youngstock (buffalo and suckler progeny) be retained at the proposed site, with only animals aged 20 months and older kept at a different location. This will not help to avoid the spread of disease, including respiratory infections such as IBR (Infectious Bovine Rhinotracheitis). Although vaccinations are always an avenue, prevention is always the first line of defence.

Furthermore, the susceptibility to disease will be different between buffalo and more conventional cattle, and it would be best practice to create separate winter housing for each species to avoid this scenario.

When larger numbers of animals are housed together, disease can spread rapidly, with potentially excessive losses. For this reason, I would not recommend that buffalo calves be in contact with older animals, as they cannot easily be replaced.

I understand that the buffalo and suckler cow herds are currently being winter housed in separate locations and that new high-standard and designed milking facilities have been provided for the buffalo. Having previously supported the management of the buffalo, I would wish to see the reasons why the current arrangement could not continue, as such an arrangement would, for the reasons set out above, be a sensible management arrangement.

Practically for the buffalo's welfare, the proposal to combine the majority of livestock at one location is likely to have many disadvantages. For example, buffalo are a very different beast from a conventional milking cow; the milk yield is low, and sudden changes in environment or diet can cause milk loss, sometimes permanently. Their gestation period is longer, and their heat cycles can be

silent, meaning that bulls are often the preferred method of service rather than Artificial Insemination. They need to be moved with care and at their own pace; you cannot rush them; they need room to move about due to their horns and potentially aggressive attitude toward others. Ideally, they should be kept in groups that they become accustomed to. If they decide they do not like another animal, they will bully and injure it. This can be as simple as a lame animal being picked on by the others.

The case for high animal welfare and being '*best in class*' is admirable and should be strived for, but this will be best achieved by keeping the buffalo separate from the suckler cows. The facilities can be structured according to the animals' size and behaviour, which will provide the best for their welfare and staff health and safety while handling them. Disease outbreaks can be contained and avoided more easily. **I would, therefore, conclude the case has not been made to group most of the livestock at one location.**

B. Could the existing farmyards be redeveloped with modern farm buildings, where necessary, rather than building on a new site?

This is the key question: if there was a functional set/s of farm buildings would the application be superfluous?

Rural Solutions has stated: "*None of the existing sites are suitable to host the expanded livestock enterprise, regardless of their ability to host replacement buildings. This is clearly demonstrated in the FRSS report (pages 15 – 19 and Appendix 1).*"

This premise is based upon the two herds being housed and managed at a single location.

Evidence has been provided to demonstrate that many of the Estate's farm buildings need modernising, and I agree with this, but I am unable to find a feasibility report clarifying what would be involved to bring the existing sites up to modern standards.

Clearly, work has recently been done to update the farm buildings to house the buffalo, but no evidence has been provided as to why they could not remain at this location.

Turning to the specific design of the proposal, I would support sufficient space allowance for the buffalo. They need space, but I disagree with Rural Solutions' suggestion that the native British White cow needs the same floor space as a dairy cow.

However, more importantly, I would like to see a separate assessment of building needs for the two livestock enterprises. i.e. what is required for the suckler cows and what is required for the buffalo. Using your table's figures, this would be:

Suckler cows	Space Requirement m ²	Number of animals	Total space m ²
Beef cow (suckler cow)	5.85	150	877.5
Beef birth – 12 months	3.95	180	711
Beef cow or steer 12 – 24 months	5.85	150	877.5
Bulls	10	2	20
Total			2,486

Buffalo	Space Requirement m ²	Number of animals	Total space m ²
Dairy cow	8.5	100	850
Dairy replacement 13 months to first calf	5.85	40	234
Dairy replacement to 13 months	3.95	44	174
Bulls	10	4	40
Total			1,278

A better assessment can then be made of the existing sites and the work identified to what would be required to avoid the proposed new development.

Rural Solutions states that “There are no ‘dirty water lagoons’ in the proposal, and the structures “are flood attenuation ponds.” However, assuming animals are moved across the open yards for daily milking or any other reason, slurry will be produced. Therefore, details of the proposed slurry management, including parlour washings, etc., need to be set out.

I am concerned that the bulk milk storage is located close to the slurry tank. When the slurry tank is stirred or emptied, ammonia is created, and there is a risk of milk tank contamination during emptying.

I have serious reservations about the proposal to milk buffalo in a rotary parlour, if a rotary were to be used for buffalo it should be of the Tandem type with the cows standing side on, and the dairyperson on the inside. This allows the animal to walk on and off in a forward's direction. The proposed rotary with an external dairy person, as shown in the planning application, requires the animal to step backwards off the platform when she has been milked, and in my experience, buffalo do not like doing this; they always prefer to go forward. As you have identified, this would be an expensive parlour for what would probably only be 75 in milk most of the time, assuming all-year-round calving and a 3-month dry period. Buffalo like to be individuals, which is why the Tandem suits them. In Italy, most of the bigger herds are milked in large Herringbone parlours, with rapid exit, which allow animals to always move forward.

I would, therefore, conclude the case has not been demonstrated as to why existing farmyards could not be redeveloped with modern farm buildings. I would add further that the proposed round structures will have several limitations, especially for the buffalo herd.

C. Is the proposed design suitable and viable without a financial business case?

You have highlighted in your report the South Somerset Local Plan Policy EP4:

“EXPANSION OF EXISTING BUSINESSES IN THE COUNTRYSIDE “

‘Proposals for the expansion of existing businesses in the countryside will be permitted where: The business has been operating successfully for a minimum of 3 years, and is a viable business;’

I agree with Rural Solution's view that many factors are involved in creating a viable enterprise. However, while it can be accepted that the British White Suckler herd is a conventional type of enterprise, this is not the case with the buffalo.

They are themselves and they produce a niche product, making the market unpredictable, and this comes with higher risk. Unlike a conventional dairy enterprise, you cannot sell surplus milk into the open markets, making it extremely hard to get the production against demand strategy right.

There is a track record of buffalo farms going wrong in UK, one went into receivership in 2023/24, and I know of another that is currently struggling. These are separate from the location that these buffalo came from, which had numerous reasons for being sold, one of them being the difficulty to produce the anticipated financial returns.

Therefore, I would support your approach that the planning process and the Local Plan policy require due diligence in assessing the financial viability of the buffalo enterprise.

D. Is the proposal sustainable without on-site rural workers' dwellings for key workers to be available to attend to the livestock's animal welfare?

Rural Solutions' response to you identifying that there is a lack of rural worker's dwellings to support the enterprises at the proposed location was:

"We do not agree with or accept this statement. It has no basis in fact or evidence. Please note however that there are two existing 'rural worker's dwellings' owned by the applicants in the immediate vicinity that will be used, along with visual and digital technology, in the management of the site and to support stock husbandry. The Farm Manager lives 520m from the site, with full visibility, and Farm Foreman within 560m."

In my experience, the labour requirements will need to be 3-4 full-time stockmen, at a minimum, and two stockmen should always be on-site when handling animals; lone working with buffalo is not acceptable. The current proposal only enables two members of staff to be readily on call, with no allowance for holidays or sickness. The health and safety aspect of handling buffalo in a normal situation should not be underestimated. In addition to this, there will be many occasions when required to manage calving or fresh-calved cows. Technology can get you so far with indicators such as "Moo Call Calving Sensors" and effective use of cameras. However, Vets often advise that fresh-calved cows should be penned individually and given electrolytes. This should never be done alone, but particularly at night, it will be problematic.

Although it is advised the farm manager and foreman live less than 600 metres away, it should be assumed they are not the ones doing the everyday tasks. In any event, at this distance, the locations would be out of sight and sound, and most dairy farmers I know would advocate having key staff living nearer.

It is highly likely that it would be or will become advisory for most Farm Assurance Schemes that staff live on site, especially with the number and type of cattle involved on this holding. With the high standards that want to be achieved, it is logical that several rural worker dwellings will be sought in close proximity to the proposed development.

E. Is building on Grade 1 land essential when there are alternative solutions?

As stated above, the evidence for alternative locations has not been made available.

I hope the above is helpful and I would be happy to advise the planning committee or attend any site visit should the Council seek professional independent advice on what is required for the management of the buffalo or suckler cow herds.

Kind regards

A handwritten signature in dark ink, appearing to read 'B. Goodenough', written in a cursive style.

Brian Goodenough