

Your Ref: 24/01203/FUL  
Our Ref: 10238

16<sup>th</sup> January 2024



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Mr S Fox  
Somerset Council  
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Dear Mr Fox

**Application No:** 24/01203/FUL  
**Location:** Manor Farm, Pound Lane, Yarlington, Wincanton, Somerset, BA9 8DG  
**Proposal:** Demolition of existing agricultural buildings and associated yards and landscape restoration of cleared area; replacement farm buildings and yard area with associated new access link to existing farm track, drainage infrastructure, and landscape works.

Reading Agricultural Consultants Ltd (RAC) has been asked by The Black Eight group to respond to Rural Solutions' redacted rebuttal letter.

To provide the Council with further independent advice, I contacted Mr Brian Goodenough of Freshwater Meadows to review the RAC assessment and Rural Solutions' redacted rebuttal letter.

Mr Goodenough has 20 years of experience advising on and managing dairy buffalo herds. He was closely involved in managing the buffalo herd related to this application before it was moved to the Emily Estates.

Both Mr Goodenough and I have identified that new agricultural buildings will be required for the herd, but this is different from requiring a new farm site.

Furthermore, Mr Goodenough has highlighted concerns with the proposal relating to animal welfare, potential staff safety and slurry management, as well as housing all animals on one site at the chosen location.

The proposal will require a significant capital investment with uncertain financial returns. As Mr Goodenough has identified, the viability of any herd of buffalo should not be assumed as a given.

The Local Plan Policy requires in Policy EP4: *"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"*. The applicant has not provided any financial justification to support their assertion, with Rural Solutions stating, *"The proposed design is entirely suitable. The question of financial rationale is beyond the remit of the FRSS report, and we would suggest the RAC response."*

The viability and sustainability of the venture cannot be assessed without the financial figures, and the applicant has not addressed this.

Similarly, the suitability of the existing sites cannot be assessed without a feasibility report identifying the work required to upgrade them and manage the livestock separately. The case for a new site is not made just by determining that the existing buildings are unsuitable or advocating that it is necessary to house all livestock on a single site. There appears to be a fundamental lack of recognition from the applicant that managing the buffalo and suckler cow enterprises separately is an agricultural option, or even the preferred option.

The proposal to provide this level of livestock housing, including a livestock breed that requires specialist management, with only two rural dwellings, both over 500m away and 'out of sight and sound' of the proposed development, while relying on "*visual and digital technology, in the management of the site and to support stock husbandry*" would appear misguided and not supported by Mr Goodenough, who has direct experience in managing buffalo. I have undertaken many rural dwelling assessments for your council and other local authorities and can confirm that this arrangement to rely on dwellings located some distance from the main livestock centre would not be conventional.

While there are different opinions on the livestock building space requirements, Mr Goodenough makes the sensible point of separating the enterprises (suckler cows and buffalo) and accessing the floor area separately. That way, it would be far easier to evaluate the existing sites against each enterprise rather than claiming the necessity of having all livestock grouped together.

In evaluating this application's merits, I identified five key questions in my letter to you dated 24th July 2024. I have now received independent advice from Mr Goodenough, a leading livestock consultant with significant experience in managing buffalo including from this existing herd. I have also seen Rural Solutions' rebuttal response to you.

In re-considering these two further pieces of information, I remain unchanged in my advice to you based on these key questions:

- A. Is there a requirement for the livestock enterprises to be grouped together, thereby requiring a larger set of buildings?  
**No, there would be ways to group cattle at separate locations, which will most likely be more beneficial for animal health.**
- B. Could the existing farmyards be redeveloped with modern farm buildings, where necessary, rather than building on a new site?  
**Yes, this option is available and some infrastructure on those sites can be reused.**
- C. Is the proposed design suitable and viable without a financial business case?  
**No, a new farming proposal at this scale would require a detailed 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?  
**No, further planning applications for on-site rural workers' dwellings would likely be forthcoming.**

- E. Is building on Grade 1 land essential when there are alternative solutions?  
**No, there would be alternative agricultural solutions to avoid the proposed development on Grade 1 land.**

Yours sincerely,

A handwritten signature in blue ink that reads "Roger BB Sewill". The signature is written in a cursive style with a large 'R' and 'S'.

**Roger Sewill MRICS**