

**Rebuttal evidence for planning appeals**  
**References: APP/Y1138/A/12/2181807, APP/Y1138/A/12/2181808,**  
**APP/Y1138/A/12/2181821**

Greenham Reach Smallholdings

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- 1.1. This rebuttal evidence refers to the Proof of Evidence submitted by Acorus Rural Property Services Ltd. The specific element that is considered is that of required time input for each of the businesses.
- 1.2. I have already submitted evidence in respect of site suitability and all necessary introductory details can be found there.
- 1.3. The Acorus report makes reference to Standard Man Days (SMDs). The use of so-called standard labour figures bears little if any relationship to the kind of production systems proposed by the putative Greenham Reach plot holders.
- 1.4. The use of such figures has effectively been abandoned and while tables of such figures exist in peoples' filing cabinets it is virtually impossible to find a current reference to them using a well-known search engine. Much of the reason for their falling into disuse is that it has been recognised that the variation between holdings can be significant despite a superficial resemblance.
- 1.5. The only things that can be found on the Internet are references to Standard Labour Requirement (SLR) coefficients. These are not used to assess businesses for their actual labour requirements but are used alongside Standard Gross Margins to place farms in different size bands by the Farm Business Survey.
- 1.6. The problem involved in the use of such figures is that they can give a reasonable indication on larger areas with a high level of mechanisation. They generally break down completely when applied to areas that are fractions of a hectare. They also become increasingly irrelevant in systems that are more dependent on hand labour.
- 1.7. The report notes that as holdings have generally become larger and more efficient the standard hours per hectare figures should reduce. By the same token moving down the size scale results in higher figures. Detailed figures have been submitted with each of the Design and Access Statements that have taken well known and successful operations as benchmarks.
- 1.8. I have carried out a number of visits to horticultural holdings where the calculation of labour input has been relevant. Each case was different and had to be calculated separately as there are no absolute figures for these kinds of operations. Nonetheless I can say that the figures as submitted in the original planning applications are broadly comparable with those calculations and with what have seen in small-scale operations across England and Wales.

- 1.9. The Acorus report does note that it is entirely possible that the days spent running the proposed operations will be full. It notes that long days are not unusual as this is the nature of agricultural operations. In fact the report appears to take issue with the nature of the labour rather than the actual time input itself.
- 1.10. The arguments for essential need have been set out elsewhere in a number of submitted documents and I do not intent to re-run them here. The argument of the Acorus report appears to be that routine labour does not count only that which is directly linked to essential need.
- 1.11. It is generally conceded in the report and elsewhere that essential need is mainly linked to the solving of problems and emergencies. It would be a strange kind of business that was constantly trouble-shooting and heading off emergencies. In any land-based business where essential need has been identified much of the work will be routine. It is this routine work that can be crucial in preventing the business damaging emergency.

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- 1.12. The main thrust of this evidence relates to an assessment of the suitability of the Greenham Reach site for the enterprises set out in the original planning applications (11/02007/MFUL, 12/00045/MFUL and 12/00107/MFUL). This includes assessments of the soils, topography and proposed management approaches. Reference will be made to other documents where appropriate.