RESPONSE TO THE APPELLANTS FINAL COMMENTS

IN CONNECTION WITH AN

APPEAL TO SECRETARY OF STATE

WILLOW FARM HOLLIES LANE PATTINGHAM WV6 7HJ

OPERATED BY

MR & MRS ANNING

PREPARED ON BEHALF OF SOUTH STAFFORDSHIRE COUNCIL

PLANNING INSPECTORATE REFERENCES: APP/C3430/C/22/3306177 & APP/C3430/C/22/3306178

LOCAL PLANNING AUTHORITY REFERENCE: 18/00676/UNCOU

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ASSESSMENT OF THE RURAL ENTERPRISE AT WILLOW FARM IN CONNECTION WITH THE ENFORCEMENT APPEAL – RESPONSE TO NEW/LATE EVIDENCE

1. INTRODUCTION

- 1.1 This document is prepared in response to the Appellant's final comments which are considered to contain additional, and new information (as confirmed by the PINs Case Officer) about the proposed farming operation carried out by the appellants, on behalf of South Staffordshire District Council. The document is prepared without the benefit of a site visit or interview with the appellants.
- 1.2 The response will deal with each document submitted by the appellant via the Planning Inspectorate on 6 December 2022 and should be read in conjunction with the submissions already made by the Local Planning Authority.
- 1.3 To assist the Inspector, the same section headings as used in the Appellants' Rebuttal Statement have been adopted in this response. As advised by the PINs Case Worker, the comments contained within this Statement focus upon the newly introduced evidence contained within the Rebuttal Statement and the accompanying Appendices, as highlighted in the following text.

COUNCIL'S COMMENTS ON THE APPELLANTS' REBUTTAL STATEMENT

2. COMMON GROUND

- 2.1 It is common ground that the site lies within the Green Belt, and as such very special circumstances need to be demonstrated.
- 2.2 The main issue in commonality between the previously dismissed appeal ref: APP/C3430/W/20/3253786 and the current appeal is that the development site is within the Green Belt. It is not common ground between the parties that very special circumstances have been demonstrated by the appellant. The following



extracts from the appeal decision reflect the same policy and guidance positions in regards to new isolated homes in the countryside: -

- 11. Paragraph 79 (no Para.80) of the Framework states that the development of isolated homes in the countryside should be avoided except in specific circumstances including where there is an essential need for a rural worker to live permanently at or near their place of work. This is substantially the same as the provisions in Paragraph 55 of the 2012 version of the Framework. In this regard, my attention has been drawn to the case of Embleton2, where it was concluded that the test under paragraph 55 only required an assessment of whether there was an essential need for a worker to be at or near the site.
- 12. Nevertheless, the Planning Practice Guidance (the PPG) sets out that the functional need and the degree to which there is confidence that the enterprise will be viable for the foreseeable future are both factors that may be relevant when considering whether there is an essential need for a rural worker. Moreover, the case law relates to the Framework and not to the development plan which was found sound and adopted subsequent to the publication of the Framework in 2012. Consequently, although the Framework is a material consideration, the starting point for decision making is the development plan.

3. SMOKE AND MIRRORS

- 3.1 This is a rather disingenuous statement and not worthy of a response.
- 3.2 That said, it is difficult to believe that in the current time, with internet access to planning advice and policies, on-line forums etc, that anyone could be so naïve as to leave a perfectly adequate home, and buy a caravan and start to live on a field without considering whether or not planning permission is required. It wouldn't be the first time that someone has done this in the belief that if they are residing on site, planning permission is more likely to be forthcoming.



3.3 The Inspector is respectfully asked to consider the facts and issue a decision based on the track record and evidence submitted by the appellants. One key fact is that the appellants have not taken advantage of the delay in proceedings as a result of the previous enforcement notice being quashed, and commenced the calf rearing enterprise. This would not be an unrealistic expectation given that the equipment required comprising calf igloos and verandas are temporary and mobile in nature and easily removed if required, unlike permanent buildings.

4. **NEW BUSINESS**

- APP/C3430/W/20/3253786, and the current agricultural justification is the cessation of the procurement enterprise and the introduction of the proposed contract calf rearing enterprise. In the 2019 application and subsequent appeal both Mr & Mrs Anning were named as applicants/appellants. At paragraph 3 of the appeal decision, it states: 'Mrs Anning is named as the appellant in the appeal form, but the applicants are named in the application form as Mr and Mrs Anning. The agent confirmed that the appeal should proceed in the names of both Mr and Mrs Anning', therefore there is consistency in the names of the applicants/appellants in both cases as well.
- 4.2 The introduction of the proposed calf rearing enterprise appears to signal a change in direction for the enterprise. The land owned at Willow Farm, and the wider farmed land is understood to be the same, or similar as in 2020. The farm building at Willow Farm is the same and the labour employed is the same as before. Whether the business is considered an existing enterprise changing direction, or a new enterprise, the same planning policies and guidance apply to the assessment of the proposed enterprise.

5. ALTERNATIVE SCHEME

5.1 The Local Planning Authority has no comments to make having previously set out its views on the matter within the previously submitted Appeal Statement.



6. RESPONSE TO THE AGRICULTURAL ASSESSMENT

In response to Para 6.2 of the appellants' Rebuttal Statement (hereafter referred to as the RS), the trading entity in 2019 was GS Anning, however, the business overview referred to in the 2019 appeal was described in the May 2019 Planning & Justification Statement prepared and submitted on behalf of the, then applicants as: -

4.0 BUSINESS OVERVIEW

- 4.1 The applicants are a registered agricultural business with the Rural Payments Agricultural (RPA), having a Single Business Identifier (SBI) and County Parish Holding number (CPH) for Willow Farm, Hollies Lane, Pattingham. The land is registered with the RPA and utilised to claim the Basic Payment Scheme.
- 4.2 The applicants are Gary and Caroline Anning, who are both involved in the farming business. Gary Anning has worked in the livestock industry for 35 years, and Caroline Anning is the 4th generation of a local farming family.
- 4.3 The business consists of two main elements;
 - 1 Lamb Enterprise; and
 - 2 Procurement Enterprise
- In response to Para 6.3 (RS), the calf igloos are not structures, they are chattels (otherwise they will require planning permission) and could easily be moved around the site or even removed if no longer required. The appellants are already residing on the site and therefore it is surprising that they have not obtained at least one igloo and veranda to start the calf rearing enterprise, which would demonstrate a firm intention and ability to develop the enterprise as described. These items are often offered for sale second-hand on well-known



on-line auction and advertising websites such as e-bay and Facebook Marketplace and the farming press etc.

Paragraph 3.10 of the Council's November 2022 Agricultural Worker's Dwelling Assessment (Appendix A to Council's Appeal Statement) actually states 'As yet there is no infrastructure for the calf rearing operation at Willow Farm. The calf rearing enterprise is designed to be a year-round operation, although initially it will be for 2.5 batches of 60 calves, and therefore occupy around 36 weeks of year one rising to 300 calves, (5 batches) per year in year three. The calf rearing operation would give rise to an essential need when fully established, and is planned to be a year-round operation, however in itself does not relate to a full-time worker requirement'.

In response to Para 6.5 (RS), it is with respect that the Inspector's attention is directed to paragraph 3.11 of the abovementioned November 2022 Assessment (Appendix A to Council's Appeal Statement). Phil Plant of Mid West Planning Ltd has been involved in sheep farming, and in calf rearing, and therefore has a first-hand appreciation of these agricultural enterprises whilst working on the family farm and as a sole trader. The appellants appear to be stating that they need to check-the calves last thing at night (10-11pm) and again at 5am. A late-night inspection of the calves would be useful, and an early morning inspection taking place at the start of the day and coinciding with the feeding and bedding regime would be commonplace. 5am is probably an earlier start than on most farms other than dairy farms. It is considered that the administration of medicines in between these hours is unlikely to be necessary or actually take place.

Fire and flooding is a low risk, most associated with permanent buildings with fixed electrical installations and water supplies. In this instance the igloos are said to be mobile and therefore unlikely to have mains electricity services. If mains water is connected to the water troughs, they will most likely be installed under the veranda and not inside the igloo and therefore a leak is unlikely to constitute a significant threat to animal welfare.

I consider that attempts by calves to escape are very limited and likely to take place during daylight hours. Calves simply don't attempt to go looking for their



mothers when separated at 2-3 weeks because they will have been separated at the dairy farm (cows sometimes try to locate calves immediately after separation, but it is normally when they hear them calling). The calf igloos and verandas are designed to contain the calves safely and with enclosures high enough to deter would be escapers. Furthermore, as these igloos and verandas are moved around the field at Willow Farm, there will be instances when they are located some distance from the static caravan, unlike a permanent calf rearing building located on a farm yard.

6.4 **In response to Para 6.6 (RS)** the appellants' agent is not accurately representing the content of paragraph 3.10. This paragraph reads as follows: -

'As yet there is no infrastructure for the calf rearing operation at Willow Farm. The calf rearing enterprise is **designed to be a year-round operation**, although initially it will be for 2.5 batches of 60 calves, and therefore occupy around 36 weeks of year one rising to 300 calves, (5 batches) per year in year three. The calf rearing operation **would give rise to an essential need when fully established**, and is planned to be a year-round operation, **however in itself does not relate to a full-time worker requirement'**.

Paragraph 3.10 confirms that the lambing operation at Willow Farm is a seasonal activity occupying a two-month period each year. The calf rearing by it's nature also gives rise to a functional or essential need, however the calf rearing does not constitute a full time requirement, but merely a part time one. Justification for a new dwelling associated with an agricultural enterprise should relate to a full-time requirement and not a seasonal one or a part-time one. Afterall there could be an essential need to be on a particular site to calve one cow per year, but this would not justify a new dwelling in the countryside being a seasonal and part-time requirement.

6.5 **With regard Para 6.7 (RS)** the appellants and the LPA were in some disagreement about the Standard Man Day (SMD) calculations due to the error about hectares/acres being used. This is now rectified.



- licence, informal agreement and short-term Farm Business Tenancy agreements reseed land every 5 years? The appellants have not provided the LPA with any specific information about the location or tenure for land rented away from Willow Farm. The appellants' agent has included in their labour calculation for grassland reseeding, pasture management and hay making, however these activities are activities that do not relate to an essential need to reside at Willow Farm, firstly because the land is away from Willow Farm, and secondly because the activity is part of a normal working day on a farm.
- 6.7 In respect of Para 6.9 (RS), there remains disagreement about the labour figure attributed to the calf rearing operation despite the email exchange between Graham Redman of the Anderson Centre and Angela Cantrill (Appendix 1 of RS) Mr Redman explains that the figure is pro-rata, and refers to Mr Cook's email on the 18th November 2022.

Weeks 3 to week 12 is only 9 weeks out of the 26 weeks (0-6mths) that the SMD figure is based upon. 9 weeks represents approximately 34.6% of the six months that the SMD figure relates to. 34.6% of 1.2 SMDs equates to 0.415 SMDs. Given that the system of calf rearing in igloos and verandas is a modern and very efficient way of rearing calves, the apportionment of the 6 month calf rearing SMD to 0.6 SMDs per calf reared is considered reasonable in this instance.

Whatever SMD is applied to the calf rearing operation, the labour requirement for the business as planned is in excess of 1 full time worker equivalent. This is not in dispute.

Paragraphs 3.20 to 3.25 of Appendix A to Council's Appeal Statement "Agricultural Worker's Dwelling Assessment" explain why it is considered that the enterprise has not been well planned. The enterprises planned, i.e., sheep breeding and calf rearing are enterprises with relatively short cycles of production. Calf rearing is an enterprise that is relatively easy to start up, especially if the housing is temporary in nature, and therefore low cost. There has been no detailed explanation about how the events identified, such as Brexit or market volatility have or will impact the business.



- The letter from D.P. Manning (Appendix 3 of RS) confirms that he will supply calves at 2-3 weeks of age in bunches of 60 starting in the spring of 2023 to Mrs Caroline Manning. The letter is identical to the one issued in December 2021. The appellants currently do reside on site. A calf rearing operation whereby calves are reared for just 9 weeks is an enterprise that could be commenced fairly easily and terminated at no more than 9 weeks' notice should the need arise. Should the appeal be dismissed, the appellants would have time to wind up the operation if they wanted, or had to.
- 6.9 **In response to Para 6.13 (RS)**, the Inspector is respectfully invited to consider the points raised at paragraphs 3.26 to 3.28 inclusive of Appendix A to Council's Appeal Statement "Agricultural Worker's Dwelling Assessment".
- 6.10 **In response to Para 6.14 (RS)**, the appellants argue that they have used upto-date local market sources. The Meadow Quality data dates from February 2022 and is now 12 months out of date.
- 6.11 **In response to Para 6.15 (RS)**, please see below.

Fixed Costs

6.12 **In response to Paras 6.15 to 6.22 (RS)**, labour is required to operate the farming enterprise and therefore, it is reasonable to expect the enterprise to be able to cover the cost of employing the worker concerned, whether an actual employee, or the appellants themselves.

It is perfectly reasonable to expect the enterprise to be able to pay the workers concerned a wage (drawings in this instance) that at the very least reflect the National Minimum Wage (or Living Wage) to represent a return on the appellants' labour, management of the business and the risks associated with running a small business. It doesn't really matter if the 'wage' is accounted for as a 'fixed cost', or taken into account when the 'profit' figure is arrived at.

With reference to Appendix 2 (RS), the appellants have calculated the labour required to operate the business at 1.32 full time equivalents (FTEs) in year one,



1.66 in year two, and 1.89 FTEs in year three, and therefore it is considered very reasonable that the proposed business should be planned well enough to cover these costs.

The appellants have stated that any additional labour requirement above and beyond the one paid worker will be met by unpaid labour, which suggests that of the two workers involved in running the business (Mr & Mrs Anning), only one worker should receive a wage, even though at year three the appellants state that the business has a requirement for 1.89 FTEs. Wage costs are increasing very significantly, and the appellants have failed to take into account the National Living Wage for April 2023 in their budget, prepared for the November 2022 appeal statement.

Standard published data is used to assess farm businesses when planning applications are made for new dwellings if actual accounts are not available, such as for new ventures, or when a farm adopts a new enterprise and the accounts are only partly reflective of the proposed faming operation. Standard budgets are a snapshot of the situation for a given enterprise on a nationwide basis, they do not allow for speculation as to how a particular agricultural sector will perform, because there are so many factors that can impact, positively or negatively, on a particular enterprise. Use of the standardised gross margin data to assess the business over three years assumes continuity in the performance of a particular sector or enterprise to allow an 'all things being equal' assessment. Based on this assessment the business generates a loss of approximately £13.5k in year one, £10.4k in year two, and £8.4k in year three. There is no 'double accounting' for the cost of labour, it is a fixed cost in this assessment of some £38.8k per year, which is commensurate with the cost of employing the required workers on the National Living Wage, with National Insurance and pension costs etc.

Other overheads are benchmarked on farms, in this case from 0-90 hectares in size across the country, and cannot account for local variations. In my opinion the cost of owning and operating a tractor and farm machinery, for example, whether in Staffordshire or Somerset will be broadly the same. The appellants have stated that they do their own reseeding, make their own haylage, all of which requires machinery, fuel, and all of which depreciates. Larger farms will be able



to spread this fixed cost over more hectares than smaller farming operations, therefore it is considered that the use of standardised fixed cost data is probably advantageous to the smaller enterprise in this assessment. There has been no mention of the cost of acquiring the calf igloos and verandas. These will cost approximately £7k for each unit and up to four units are said to be required. The cost will be need to be financed initially, and depreciated over time.

It is considered that the appellants' fixed costs (**Appendix 6 RS**) are considerably less than published data, mainly because labour costs are excluded. Appendix Three of the Mid West Planning November Assessment compared budgets with both approaches in terms of fixed costs. In both calculations it is clear that based on standard costings for sheep production and for calf rearing, the proposed enterprise will not cover the cost of even a single full time worker on the National Living Wage.

Sheep Gross Margin

In response to Paras 6.21 and 6.22 (RS) the appellants would like the assessment to be carried out using higher than average lambing percentage, lower fixed costs to arrive at a level of 'profit' that just about covers a single wage. It does not take into account the cost of the capital that will be required to establish the igloos at Willow Farm to rear the calves in, nor does it consider depreciation of these assets, or the annualised cost of the long-term replacement dwelling that will be required.

The appellants would like to use their own lambing percentage of 170% (Appendix 5 RS) without providing any evidence of this level of performance, despite operating a sheep enterprise at Willow Farm since 2007. In fact, the lambing percentage applied in The John Nix Pocketbook for Farm Management 53rd edition 2023 is 175% for 'average performance' flocks. For the avoidance of any doubt the relevant pages are depicted below at Appendix 2. The appellants have not taken into account the mortality rates for young lambs and older lamb mortality, that combined account for 10% of lambs born.



Calves Gross Margin

In response to paras 6.23 to 6.26 (RS), it doesn't really matter if the calves are reared on contract or not. The available margin in calf rearing will be the same. What it does mean is that the arrangement between Mr Manning (Appendix 3 RS) and the appellants is an informal arrangement and no doubt Mr Manning will be seeking market value for his calves. Mr Manning is based at SY5 0DW, and the appellants are at WV6 7 HJ, some 38 miles apart, so describing his as a 'local dairy farmer' is questionable.

The appellants' gross margin for calf rearing **(Appendix 5 RS)** is double that of standard published data in The John Nix Pocketbook for Farm Management 53rd edition 2023, and is based almost entirely on lower calf purchase prices. Standard data calf price is £190, and the appellants' is £148.

There is no conclusive evidence submitted that the appellants can consistently acquire quality calves at £148. The AHDB data submitted gives prices for continental cross heifer and bull calves for September and October 2022, and October 2021 and the appellants have averaged these figures to arrive at £148 per head. Calf prices for October 2021 were £217 for continental cross bull calves and £166 for heifers which demonstrates volitivity in this market. The use of standard variable costs due to the as yet untested enterprise is a sensible approach, and so would the use of standard calf costs and sales values, after all input costs will have changed and so will calf costs and sales values. For example, the average comparable calf price for the week ending 14 January is at £160.87.

There is no point in relying on current market data because it changes continually and we are trying to assess whether or not the business is likely to be successful over a long-term period. The projections are for three years to establish if the business can be sustained over a longer period, giving rise to the 'very special circumstances' required to justify what would otherwise be inappropriate development of a dwelling in the green belt. If the appeal is allowed, there has to be the expectation that a permanent dwelling will be sought after the initial three-year temporary consent expires (assuming that such a condition would be applied). The use, therefore, of standardised published farm enterprise performance data as has been indicated in the LPA's previous submissions, is an



effective way of evening out the highs and lows of a particular enterprise, to see if the business is likely to be successful or not.

Summary of financial viability

6.15 **In response to paras 6.27 to 6.31 (RS)**, the appellants have not taken into consideration the announced and planned increase in the National Living Wage from April 2023.

The April 2023 National Living Wage will be £10.42 per hour. Based on the 40-hour week cited by the appellants, the annual wage for one worker will be £21,673.60. The anticipated cost of employing a worker, including NI, insurance and pension contributions will be in excess of £24k p.a. The labour requirement for the proposed enterprise, based on the appellants' calculation is 1.69 FTE in year three (Appendix 2 RS), and clearly the business cannot sustain the cost, even on April 2023 wages, of the labour required to operate the business. It is accepted that some farming operations, do have access to unpaid casual labour. However, the appellants have not told us where this resource will be found. Often family farms have children that can help on the farm, especially at busy times, for example during harvest or lambing times, but the appellants have not provided any details. Should planning permission be granted for a new dwelling in the green belt if the business relies on unpaid labour to make it viable?

The appellants moved onto the site without planning permission to do so, something that most reasonable people ought to have known would be required. The lambing enterprise is a seasonal activity, that has taken successfully place for a number of years before the appellants moved into the caravan, when they had to manage it form their former home. The calf rearing enterprise is one that is not yet established, and will at year three, result in 300 calves reared per year in up to four igloos and verandas.

6.16 **In response to Paras 6.32 and 6.33 (RS)**, it is established that the sheep enterprise can continue without a permanent dwelling at the farm. The calf rearing enterprise, using calf igloos, in my opinion could operate successfully without a dwelling on site if the appellants want to establish one. There are any number of CCTV systems linked to mobile phones etc that can be installed in the



igloos and verandas to assist in the management of the calves from a dwelling within say five minutes' drive (3 miles) to the farm.

It is very easy for the appellants to state that nothing short of a dwelling at Willow Farm will meet the needs of the business, however history has shown that lambing can be carried out successfully from a dwelling elsewhere in the locality, and there is the ability to site a caravan for the lambing period under permitted development available to the applicants. One has to question the logic of establishing a calf rearing enterprise in temporary structures other than in an attempt to justify a new dwelling in the green belt. The fact that whilst the appellants have lived at Willow Farm, they have not attempted to establish as least one calf house and start the business to demonstrate a firm intention and ability to do as they have planned.

7. OTHER POINTS

7.1 The Local Planning Authority has no further comments to make.

8. OTHER DWELLINGS

8.1 **In response to paras 8.1 to 8.7 (RS)**, it is considered that the essential (or functional) need identified can be met by other existing accommodation in the area. Other accommodation is therefore suitable and as the LPA has previously demonstrated, is available on a regular basis in the local area.

Figure Seven of the Mid West Planning Assessment in November 2022 identified six properties for sale, and 25 properties for rent within a three-mile radius of the farm.

Not all agricultural worker dwellings are located with is sight and sound of a farming enterprise. The nature of the temporary moveable calf houses mean that the calves will not always be within sight and sound of the caravan at Willow Farm. Therefore, the use of CCTV in each calf igloo and veranda is likely to be required



anyway. The difference in response times should a calf require assistance outside of the normal working day is the time taken to drive from A to B, and five minutes is considered to be a reasonable time to attend an emergency.

The appellants' circumstances regarding housing are of their own making. The fact that they disposed of a dwelling and now seek planning consent for a new dwelling in the green belt to oversee a proposed calf rearing enterprise is a material consideration.

As stated by the appellants, an hour or two delay in responding to a calf with pneumonia could be too long and prove fatal. CCTV will allow the appellants to keep an eye on calves that show signs of distress or sickness when they are not on site. A five-minute drive to the farm to check and administer medicine, might be inconvenient, however, is unlikely to make a material difference to the outcome.

Clearly the LPA and the appellants are not in agreement on the need for on-site accommodation, which lies at the heart of the current Appeal.

9. SUMMARY

- 9.1 **In response to Paras 9.1 to 9.5 (RS)**, the LPA strongly disagrees with this statement. The business has been properly assessed, <u>based on the information provided</u> and the conclusion is: -
 - The business, when fully established will have an essential need for someone to live at, <u>or close</u> to their place of work.
 - It is considered that this need can be met by a dwelling within the locality, and a seasonal worker touring caravan at lambing time if necessary.
 - The appellants have not demonstrated that they have the clear intention or ability to develop the enterprises concerned.
 - The forecast budgets put forward by the appellants for the enterprises are
 not based on standard published data, and no accounts have been received
 to substantiate the figures contained.



 It is considered that standard published data is a reliable measure of the likelihood of the business to succeed or not, and these figures indicate losses for all three years.

For the reasons set out above it is clear that the enterprise could operate from an existing dwelling in the locality, and that the business, based on published enterprise gross margin and fixed costs data, is unlikely to be profitable over the next three years. Therefore, it is considered that appellants have failed to demonstrate the very special circumstances for allowing the retention of the caravan at Willow Farm based on agricultural need.

Phil Plant BSc (Hons) MRICS

Mid West Planning Ltd.

January 2023



APPENDIX ONE

EXTRACTS FROM THE JOHN NIX POCKETBOOK FOR FARM MANAGEMENT 53RD EDITION 2023.



Spring Lambing Flocks				
Lowland Spring Lambing per Ewe (s	elling lambe.			
Performance Level	Low	off grass)		pe
Value of Lamb E/Lamb	92	Average		3. 0
£/Ewe	£	97	HIBH	PI
Lamb Sales	118		102	0
Wool	0.40	0.46		-
Less Ewe and Ram Depreciation	24	24	0.46	
Output	95	121	-40	
Variable Costs:			148	
Concentrate (Ewe and Lamb)	23	22	-	
Vet & Med	9	10	21	
Miscellaneous	15	15	12	
Variable Costs (ex. forage)	47	47	15	
Gross Margin £/Ewe, (ex. Forage)	47	75	48	
			100	
Number of Ewes with lambs per Ha.	8	9		
Forage Variable Costs £/Ewe	24		10	
Gross Margin £/Ewe	24	21	19	4
Gross Margin £/Forage Ha (Acre)	189	54	81	
Gross Margin E/Forage na (Acre)		482	814	
	(77)	(195)	(329)	
Parries De f			and the same	
Rearing Performance Data				
Lambing Stats	Low	Average	High	
Ewes in Lamb	92%	95%	97%	
Lambing Percentage	160%	175%	190%	
Lambs born per 100 ewes	147	166		
Young Lamb Deaths	8%		184	
Older Lamb Deaths		6%	5%	
Total Lamb Losses	4.5%	4.0%	3.5%	
Lambs sold per 100	13%	10%	9%	
Lambs sold per 100 ewes put to ram	129	150	169	
older. Where ewe-lambs or mainly she adjustment needs to be made. The bre	for flocks of earlings are ed will have	mature ewes included in a large effe	ct on perform	ance
Lamb Sales. Prices for lambs sold for slau liveweight of 42kg, averaging £2.30/kg n for 20% sold as stores, 20% replacement	lahta.			alo
for 20% sold as sta	ignter are fo	r the 2023 se	eason. Average	e sale
Wool: 21.	laking £97 p	er average l	amh This acc	ounts

Wool: 2kg/ewe at £0.20/kg 6 replacement and 60% sold as finished lambs.



-	Ew	78 F	tam	Per Ewe
1 Approximation	(1)	5 (650	
bes there	69	0 (128	
perchase - E cull price - E	4.		3.5	
Cull Price (Years)	59	6	596	
			45	
per per Ram	€20	83 (3.52	£24.35
rues per Ram perociation f/ewe	1	4		
- hodule	Lo		rerage	High
pending Schedule	5.		48	45
pure Freed NR	63:		£330	£330
pue Feed E/Ewe	£1		£16	£15
Lamb Feed Kg/ Lamb	13		11	10
Lamb Feed £/t			£360	£360
Lamb Feed £/Lamb	£4.	58 1	£3.96	£3.60
Lamb Feed £/Ewe	£6.	03 1	E5.93	£6.07
Total Feed Cost £/Ew	re £2	3	£22	£21
ewe and lamb tags £1	foot treatments. clude contract shearing at .75/ewe (assuming slaug	hter batch	n tags a	re used), carc
ewe and lamb tags £1 disposal £0.90/ewe in marketing, levy and tran 7. Forage Costs: Based or section, page 45. Only forage production need	clude contract shearing at .75/ewe (assuming slaug flock, straw £1.30/ewe, asport £6.20/ewe. I Low Input Permanent variable costs are includ to be considered. Simila	hter batch minerals a Pasture (seed and the	n tags a and licks £196/ha erefore o	re used), card etc. £2.30/e) refer to for overhead costs
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