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## The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

**Appeal Reference: APP/Y3940/C/15/3132119**

#### DETAILS OF THE CASE

Appeal Reference

Appeal By

Site Address

#### SENDER DETAILS

Name

#### ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- Appellant
- Agent
- Interested Party / Person
- Land Owner
- Rule 6 (6)

What kind of representation are you making?

- Final Comments
- Proof of Evidence
- Statement
- Statement of Common Ground
- Interested Party/Person Correspondence
- Other

**COMMENT DOCUMENTS**

**The documents listed below were uploaded with this form:**

**Relates to Section:** REPRESENTATION  
**Document Description:** Your comments on the appeal.  
**File name:** NLBrown\_Letter22Oct2015.doc  
**File name:** Annex1a DickVetEmail.pdf  
**File name:** Annex1b DickVetLetter.pdf  
**File name:** Annex2 LiteratureAnalysis.docx  
**File name:** Annex3 DCLG\_Letter.pdf  
**File name:** Annex4 CllrNewburyLetter.doc

**PLEASE ENSURE THAT A COPY OF THIS SHEET IS ENCLOSED WHEN POSTING THE ABOVE DOCUMENTS TO US**

*Professor Nigel L. Brown  
Saddlestone Barn  
Huntenhull Lane  
Chapmanslade  
Wiltshire  
BA13 4AS*

8 January 2015

Councillor C Newbury  
Chairman Western Area Planning Committee  
County Hall  
Bythesea Road  
Trowbridge  
Wiltshire  
BA14 8JN

Dear Councillor Newbury

**Planning Application 14/09500/FUL Sienna's Valley Farm, Chapmanslade**

As requested at the WAPC Meeting on 17 December 2014, I am writing to amplify my remarks at the meeting. As a preamble, I set out my qualifications and experience.

I am an Emeritus Professor of the University of Edinburgh, a Chartered Biologist, a Fellow of the Society of Biology, and a Fellow of the Royal Society of Edinburgh. While I do not consider myself as an expert on camelids, *per se*, I have considerable experience of livestock research as Director of Science and Technology at the Biotechnology and Biological Sciences Research Council (BBSRC) to 2008. At that time I had oversight of the research and extension activities of the Institute for Animal Health, the Institute for Grassland and Environmental Research, the Institute for Food Research and the Roslin Institute. I had strategic responsibility for all UK university research in agriculture funded through the research council. I was also a member of the Defra Science Advisory Board and advised the Institut National de la Recherche Agronomique, France. As Vice-Principal of the University of Edinburgh, 2008-12, I had oversight of the development of the Roslin Institute and I was Chair of the Scottish Consortium for Rural Research 2011-12. Currently, I am President of the Society for General Microbiology, the largest professional microbiological society in Europe, and Chair of the joint Defra-BBSRC panel assessing novel ways of eradicating bovine tuberculosis.

I have consulted with colleagues from the Royal (Dick) School of Veterinary Studies at the University of Edinburgh, the Scottish Rural University College and the Royal Agricultural University, Cirencester in formulating my report. An email and a letter from the Royal (Dick) Vet School are attached.

It is clear from my exchanges with these colleagues, and from the scientific literature that I have reviewed (attached), that alpacas and other camelids are no more difficult, and possibly easier, to look after than other UK livestock. They require some more protection against extensive wet weather than native livestock, but, being native to the Altiplano of Peru, they are more highly tolerant of cold weather. Their particular biology means that the birth of cria (young alpaca) is limited to daylight hours and is very predictable from the point of conception. Rates of conception are high, twinning is rare and birth is virtually always (97.6%) trouble-free. I therefore find it

difficult to see a justification for a breeding alpaca herd requiring year-round residential accommodation.

The application makes the case that attention is needed for sick animals and at the point of birth. Alpacas are unusual in that they show little signs of sickness. For example, alpacas suffering from bovine TB are asymptomatic until immediately prior to death. It is therefore difficult to see how residence on site will be any better than daily visits in the applicant's ability to care for sick animals. Additionally, some authorities argue that animals are best left immediately after birth to allow bonding between cria and dam. Navel antisepsis and ensuring that the cria receives colostrum can therefore be done through daily visits from a nearby residence. The point is made by others that the applicant's permanent residence is only 5 minutes' drive away, and houses to rent or purchase have been available in Chapmanslade very close to Sienna's Valley.

I note the Reading Agricultural Consultants' letter of representation states the period of gestation in alpacas to be 330+/-30 days. This wider time frame is in clear contrast to that given in the peer-reviewed literature of 342-350 days. The business plan expenditure only includes £370 per annum in the first year for 31 alpacas, plus other livestock (currently sheep, pigs and horses), at year end. This seems very small for annual vaccination, veterinary fees and TB testing. As the skin test for cattle does not work in camelids, the cheapest reliable TB test for alpacas is estimated to be £12 per animal (Enferplex from SureFarm Ltd) plus veterinary surgeon's fees. If TB testing is not to be done on this site, which has a local badger population, this is a clear disregard of the livelihoods of neighbouring cattle farmers.

In my oral presentation, I pointed out that the previous application for a barn (12/02185/FUL), its subsequent retrospective application for its relocation (14/0098/FUL) and its further extension (14/00987/FUL) was on the basis of hay production over the full area of the farm. The additional grazing by alpacas means that the requirement for the barn is no longer valid, and the business model has changed significantly within a few months.

The applicant's response to Wiltshire Council Planning Contravention Notice 14/00852/ENF makes it clear that she and her partner propose to request a permanent dwelling after 3 years. The Committee may be aware that applications seeking to justify permanent residence on the basis of alpaca farming have drawn the following comment in 2012 from Mr Philip Skill, Head of Planning at Stroud District Council: "*The use of alpacas as a means to get erroneous permissions for dwellings in the countryside is well known to the planning fraternity and recent decisions have closed the door, and bolted it, against these abuses. The exceptions for rural workers were designed to assist genuine farmers to feed the nation.*" (reported in the Gloucestershire Gazette, 8 August 2012).

Yours sincerely

A handwritten signature in black ink, appearing to read 'V. Skill', is written over a horizontal line.



**Department for  
Communities and  
Local Government**

Chief Planning Officers in England

31 August 2015

**Steve Quartermain CBE  
Chief Planner**

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Dear Chief Planning Officer,

**Green Belt protection and intentional unauthorised development**

I attach a planning policy statement on Green Belt protection and intentional unauthorised development which comes into force today.

This statement will also be laid in the house as a written ministerial statement when parliament returns in the autumn.

In addition, the government has cancelled the following documents:

- Guide to effective use of enforcement powers – Part 1 (2006)
- Guide to effective use of enforcement powers – Part 2 (2007)
- Designing Gypsy and Traveller Sites – Good Practice Guide (2008)

**STEVE QUARTERMAIN CBE  
Chief Planner**

## **Green Belt protection and intentional unauthorised development**

This statement sets out changes to national planning policy to make intentional unauthorised development a material consideration, and also to provide stronger protection for the Green Belt, as set out in the manifesto.

The government is concerned about the harm that is caused where the development of land has been undertaken in advance of obtaining planning permission. In such cases, there is no opportunity to appropriately limit or mitigate the harm that has already taken place. Such cases can involve local planning authorities having to take expensive and time consuming enforcement action.

For these reasons, this statement introduces a planning policy to make intentional unauthorised development a material consideration that would be weighed in the determination of planning applications and appeals. This policy applies to all new planning applications and appeals received from 31 August 2015.

The government is particularly concerned about harm that is caused by intentional unauthorised development in the Green Belt.

For this reason the Planning Inspectorate will monitor all appeal decisions involving unauthorised development in the Green Belt to enable the government to assess the implementation of this policy.

In addition we will consider the recovery of a proportion of relevant appeals in the Green Belt for the Secretary of State's decision to enable him to illustrate how he would like his policy to apply in practice. Such appeals will be considered for recovery under the criterion set out in 2008: "There may on occasion be other cases which merit recovery because of the particular circumstances."

After six months we will review the situation to see whether it is delivering our objective of protecting land from intentional unauthorised development.

The National Planning Policy Framework makes clear that most development in the Green Belt is inappropriate and should be approved only in very special circumstances. Consistent with this, this statement sets out the government's policy that, subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.

## Husbandry of Alpacas

Professor Nigel L Brown OBE FRSE FRSB CBiol HonDSc

Alpacas are easy animals to keep (Bromage 2006). They are docile and easily managed providing there is a constant supply of fresh water and grazing. In the UK pasture grazing is normal. They can be kept with chickens, pigs, sheep, goats, etc. However, dogs may occasionally be a problem. They are social creatures and a minimum of two alpacas is required. According to the veterinary profession and alpaca owners these animals need no more care than other large animal livestock, apart from shelter from wet weather. They need annual shearing, regular trimming of toenails and teeth by a veterinary surgeon, and annual vaccinations.

Alpacas are a relatively new introduction to the UK, so many UK veterinary surgeons have little experience of the species. Much of the work on their husbandry, including reproduction and breeding, has been done in the USA and New Zealand. The sources for the statements below are taken from peer-reviewed articles in international journals, books and conference proceedings available to the academic community.

### *Mating, gestation and birth:*

Female alpacas are induced ovulators – they do not come into season, but only ovulate 24-30 h following mating (Brown, 2000; Vaughn 2011). They will be receptive to males on reaching maturity, but will aggressively refuse the male if they are not mature or are already pregnant (Vaughan, 2011). Females become receptive to mating ~10 days following the birth of a cria (Sumar, 1996). They remain continually receptive when not pregnant.

Mating practices vary, but it is normal to keep the males and females separate, as males lose their libido if constantly kept with females (Brown, 2000). Once introduced to females, males can mate up to 18 times a day. As libido may fall off after only 3 days, a weekly rotation of males is recommended to maintain a high frequency of mating. Roughly 80% of females become pregnant in a short time. The timing of conception is therefore reasonably predictable.

The gestation period of alpacas is typically 342-350 days (Brown, 2000). There is considerable foetal loss during pregnancy resulting in 50% of females giving live births. This may be physiological or nutritional as no abortifacient diseases have yet been identified. (Brown, 2000). The majority of females give birth in a standing position and 90% of births are between 07.00 and 13.00h (Sumar, 1996), with no births recorded in observed herds between 17.00 and 04.00h (Knight et al., 1995). The timing of birth is under photoperiod control and birth is normally shortly after the onset of daylight (Knight et al., 1995; Sumar 1996). The dam can delay birth to daylight hours.

The vast majority (97.6%) of cria are born without complications (Vaughan and Tibary, 2006; Tibary and Anouassi, 1997) and survive the neonatal period without incident (Smith et al, 1994; Whitehead, 2009).

Therefore, if normal farming practices are followed and the males introduced to the females at set times, the timing of birth is highly predictable  $\pm 4$  days and attendance is required only during hours of daylight.

### *Diseases of alpacas.*

Alpacas are highly susceptible to bovine TB and are highly infectious, but rarely show any symptoms to the point of death (Broadbent, 2008; [www.alpacatb.com](http://www.alpacatb.com)). Currently there are at least 93 alpaca or llama herds that have confirmed TB (Defra TB Programme, 2015). Virtually all of these were in the South West. There is no cheap diagnostic test for bovine TB that works in alpacas, although expensive blood and other tests are available. At present there is no statutory requirement to have alpacas tested for bovine TB. It is imperative that alpacas are kept away from badgers (more than 24% carrying bTB; Broadbent, 2008). Close contact with infected animals puts owners and visitors at risk ([www.alpacatb.com](http://www.alpacatb.com)) and cases of alpacas infecting humans are known.

Alpacas and other camelids are susceptible to Schmallenberg and bluetongue viruses, both insect-borne pathogens (Afonso, 2014, Henrich et al., 2008) and bovine diarrhoea virus (Foster, 2005). These diseases can potentially be transmitted to other livestock. In addition to *M. bovis* (the causative organisms of bovine TB), they carry a number of zoonotic pathogens which can be transferred to humans. These include *Cryptosporidium*, *E. coli* O157, *Listeria*, *Salmonella*, *Streptococcus*, and *Yersinia*, (Whitehead et al., 2013).

Therefore good farming practice requires maintenance of biological security (i.e. no animal petting) and physical security (prevention of badger contact) is imperative.

### *References:*

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- Smith CL, Peter AT and Pugh DG (1994) “Reproduction in llamas and alpacas: a review” Theriogenology 41:573–592.
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- Tibary A and Anouassi A (1997). “Theriogenology in *Camelidae*”. Abu Dhabi Printing, Mina, Abu Dhabi, UAE.
- Vaughan JL and Tibary A (2006) “Reproduction in female South American camelids: a review and clinical observations” Small Ruminant Research 61: 259–281
- Vaughan J (2011) “Ovarian function in South American camelids (alpacas, llamas, vicunas, guanacos)” Animal Reproduction Science 124: 237–243
- Whitehead CE (2009) “Management of neonatal llamas and alpacas” Veterinary Clinics: Food Animal Practice 25: 353–366
- Whitehead CE, Thurston D and Kent A (2013).” Report on International Camelid Health Conference, Oregon 11-14 July 2013”

Please note that this Annex has been updated from that submitted in January 2015 only to update my postnominals and figures on TB infections, and to remove reference to compensation not been given for culled camelids. There is now a compensation scheme in place.





Thursday, 08 January 2015

## **Farm Animal Practice**

Royal (Dick) School of Veterinary Studies  
Division of Veterinary Clinical Studies  
The University of Edinburgh  
Easter Bush Veterinary Centre  
Roslin, Midlothian  
EH25 9RG  
Telephone 0131 445 4468  
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Dear Professor Nigel Brown

Thank you for your enquiry regarding the need for overnight care for alpacas.

Alpacas are hardy animals in terms of grazing and resistance to cold, however they are susceptible to wet conditions. Provision of a field shelter is recommended for alpacas in this country, ideally with a hard standing. This does not need to be a permanent structure. Most commonly timber structures, akin to equine field shelters, are used.

Predation of adult alpacas would be extremely uncommon in the UK, given that their natural predators the puma and wolf are not found here, though like any animal dog attacks may be a problem. Alpacas are usually attentive mothers capable of protecting their offspring (called crias) from our native wildlife.

Alpacas normally give birth without human assistance, however an alpaca keeper may wish to supervise a dam which will give birth imminently. The New Zealand Animal Welfare (Llamas and Alpacas) Code of Welfare 2013 states "Hembras (female alpacas) that are due to give birth must be inspected frequently to ensure that they are not experiencing birthing difficulties". I am not aware of any comparable alpaca specific welfare codes in the UK, but all general UK animal welfare legislation would apply. Alpacas are often kept on land directly adjacent to family homes, but in cases where an alpaca keeper has elected to keep animals on land distant from their home it would be most unusual to build a dwelling specifically for the purpose of observing the animals giving birth, though some herds may be of sufficient size to justify this economically. More usually an alpaca keeper might sit awake for the night in the field shelter in order to observe the animals. In the event of the establishment of a large scale alpaca farm one would normally expect the construction of agricultural buildings and handling facilities in addition the construction of a dwelling.

Alpacas may have a relatively high financial value and theft of animals may be a concern, however it should be remembered that some pedigree cattle and sheep may be worth tens of thousands of pounds and still be left unattended overnight in fields.

Should you have any further questions please do not hesitate to contact me.

Yours Sincerely

Andrew Hopker BVM&S MRCVS  
Lecturer in Farm Animal Practice



## **BROWN Nigel**

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**From:** ARGYLE David  
**Sent:** 07 January 2015 13:53  
**To:** BROWN Nigel; ARGYLE David; geoff.simm@sruc.ac.uk

Nigel,

This is what I got back from our farm animal team, but waiting also for Andy Hopker to comment when he returns from overseas

Kindest

David

"David,

Andy Hopker is the nominated alpaca expert in the Farm Practice..... Copied into this mail.

My thoughts would be that although alpacas do have some specific requirements for shelter from wet weather etc., I would not consider them to be any more difficult to look after as a breeding herd than more common livestock species (cattle and sheep).

My neighbour that keeps four of them outdoors all year round in Eddleston would testify to this.....

Alastair

Professor David J. Argyle BVMS PhD DECVIM-CA (Oncology) MRCVS  
RCVS and European Recognised Specialist in Veterinary Oncology  
William Dick Chair of Veterinary Clinical Studies and Head of School



*Professor Nigel L. Brown  
Saddlestone Barn  
Huntenhull Lane  
Chapmanslade  
Wiltshire  
BA13 4AS*

The Planning Inspectorate,  
Room 3/23,  
2 The Square,  
Temple Quay House.  
Bristol BS1 6PN

22 October 2015

Dear Sirs,

**Planning Appeals Reference APP/Y3940/C/15/3132119 and -APP/Y3940/W/15/3132117  
Sienna's Valley Farm, Huntenhull Lane, Chapmanslade BA13 4AS**

This submission applies to both of the above appeals.

My property is adjacent to the land known as Sienna's Valley Farm and has a shared boundary to the north and west of my garden. I am a Chartered Biologist and a Fellow of the Royal Society of Biology and of the Royal Society of Edinburgh. My expertise is in microbiology and I chair the joint Defra/Research Council Committee on novel methods of eradicating bovine tuberculosis. I was previously the Director of Science and Technology at the BBSRC with oversight of agricultural research in UK universities and BBSRC research institutes, including the Roslin Institute and the Institute of Grassland and Environmental Research. I have advised the French Agricultural Research organisation, INRA, and I chaired the Scottish Consortium for Rural Research. I believe this experience is relevant to the appeals before the Planning Inspectorate.

I wish to support the Wiltshire County Council Western Area Planning Committee's refusal to allow permission for the siting of a mobile home on three main grounds: requirement, process and risk.

1. Requirement for permanent occupation of the site (functional need).
  - 1.1. The claim is made that alpacas need 24/7 care. This is not the case and the evidence for this is:
    - 1.1.1. Letters from the Farm Animal Practice group at the Royal (Dick) School of Veterinary Sciences, the University of Edinburgh (Annexes 1a and 1b). This is impartial advice given by veterinarians who have no ties to the applicant, her supporters or the objectors to the proposal.
    - 1.1.2. Alpacas require relatively little day-to-day management other than shelter from the wet. They show little outward sign of disease, so on-site monitoring of health is of little value. (Annex 2 – an analysis of the peer-reviewed literature)
    - 1.1.3. The time of birth of cria is highly predictable from the point of conception and for optimal breeding males should not be allowed to associate freely with female alpaca. (Annex 2)
    - 1.1.4. Alpacas give birth only during daylight hours, unlike many farmed animals (Annex 2). There is little requirement for overnight accommodation.

- 1.1.5. Advice from Ms Libby Henson, a contractor for the British Alpaca Society, who states in an email (not disclosed) that alpacas should be checked during birthing "*as you would birthing cattle or equines*". In other words, alpacas require no additional attention than that required in cattle farming or horse breeding; indeed, less so as birthing is 97.6% trouble-free (Annex 2).
- 1.1.6. As of 21 October 2015, the applicant gives her address on the British Alpaca Society Register as 14 White Horse Drive, Frome. This is less than 6 minutes' drive from Sienna's Valley and is sufficiently close to care for the alpacas.
- 1.1.7. As indicated by others, modern methods of surveillance of livestock replace the need for residential monitoring of animals.
- 1.1.8. If overnight observation is exceptionally required, the large barn built on site would give shelter and could be provided with portable sanitary and water facilities.
- 1.1.9. A statement from Mr Phil Skill, former Chief Planning Officer, Stroud Council, who states "*The use of alpacas as a means to get erroneous permissions for dwellings in the countryside is well known to the planning fraternity and recent decisions have closed the door, and bolted it, against these abuses. The exceptions for rural workers were designed to assist genuine farmers to feed the nation.*" (reported in the Gloucestershire Gazette, 8 August 2012)

1.2. The Grounds for Appeal includes the claim (Item g2) that the applicants may suffer financial loss if they have to sell the alpacas due to losing the appeal. This is not correct. As alpacas do not require 24/7 care, there is no need to sell the alpacas, unless the sole reason for their purchase was to obtain permission to build a residence on the site.

## 2. The process

- 2.1. Both the applicant and her partner, Somerset County Councillor Derek Tanswell, have sat as Councillors on the Mendip District Council Planning Committee. They are fully familiar with planning processes and requirements, having been trained by Mendip DC.
- 2.2. Planning permission was sought retrospectively. It is notable that the Secretary of State has stated that intentional unauthorised development should be a material consideration in planning applications and appeals from 31 August 2015 (Annex 3 - letter from Chief Planner, DCLG). The letter implies that it should be material in all retrospective applications, not only within the Green Belt. The applicant is applying for retrospective permission in a Special Landscape Area.
- 2.3. The mobile home was moved onto the site on 31 July 2014. The applicant will have been in residence and operating the business for at least 16 months before the appeal is considered, and possibly half-way through a 3 year period of operation.
- 2.4. The Wiltshire Planning Officer, who supported the application, stated in her verbal and written reports in June 2015 that no advice had been received from an expert on camelids. It is true that an expert from the Royal Agricultural University did not submit material to the Committee.  
However, advice was received from the University of Edinburgh (Annexes 1a and 1b) and sent to the Chair of the Committee on 8 January 2015 (Annex 4). This was not mentioned by the Planning Officer in her written or verbal statements, even though the Chair had stated that the information would be passed to her.
- 2.5. Contrary to the applicant's statement in her Grounds for Appeal (Item a7) the Planning Committee did hear expert evidence on the functional need from the University of Edinburgh in my verbal presentation to the Committee.
- 2.6. Although I forwarded Annexes 1a and 1b and an earlier version of Annex 2 by email to Mr Coke, the Council's Agricultural Adviser, following the June 2015 Planning Committee

meeting, he has not confirmed that he saw the advice from the University of Edinburgh prior to issuing his written and verbal advice.

2.7. Although I am not alleging any impropriety, I find it surprising that the Planning Officer reporting on this case is the spouse of the Senior Planning Officer serving Mendip DC Planning Committee on which the applicant and her partner sat. I am not aware that any conflict of interests has been declared. Undeclared potential conflicts of interests would not be permitted in public bodies on which I serve.

### 3. Risk

- 3.1. Camelids are very prone to infection with bovine tuberculosis and are super-excretors of the pathogen. They do not show any sign of infection to the point of death. There are several badger setts surrounding Sienna's Valley and badger tracks occur in our gardens and across Sienna's Valley. The risk of TB transmission between infected badgers (estimated at ~25% of the population; Annex 2), alpacas and neighbouring farmers' cattle is significant.
- 3.2. The applicants made no effort to badger-proof their land before bringing the alpacas on site and have made no efforts on biosecurity, other than boot-dipping, since then.
- 3.3. Testing camelids for TB is currently a voluntary activity and uses the Enferplex TB test. This cost of £12 per animal plus veterinary fees and is not included in the applicant's business plan, which budgets £10 per animal per annum (£370 in total in year 1). Therefore, I have no confidence that the applicant and her partner will comply with such a voluntary code.
- 3.4. TB is one of the risks, and this has been proved to pass from camelids to humans ([www.alpacatb.com](http://www.alpacatb.com)). Alpacas also carry other pathogens that are infectious to humans (e.g. *E. coli*, *Salmonella*, *Listeria*, *Streptococcus*, *Yersinia*, *Cryptosporidium*), yet people are positively encouraged to visit Sienna's Valley to see the alpacas.
- 3.5. The Grounds for Appeal state (Item g1) that relocation of stock could cause stress in female alpacas and resorption or abortion of the foetus. However, pregnant female alpacas were bought and transported to the site by the applicant in 2014. That risk was considered acceptable by the applicant then. Approx. 50% of normal alpaca conceptions do not go to term (Annex 2).

Finally, ditch work by the applicant's partner to take electrical power from a powerline on the western edge of our property to the mobile home redirected water flows during heavy rain. This caused considerable flooding on our property, which the applicant and her partner have refused to discuss with me. I fully appreciate that this is not directly a planning issue and should be the subject of separate action, but is indicative of the adverse effect that the blatant disregard for planning considerations and neighbours' wellbeing has had.

I urge you to uphold the correct decision of the Wiltshire Council Western Area Planning Committee.

Yours faithfully

*Nigel Brown*

Professor Nigel Brown OBE FRSE CBiol FRSB

