



**HOME AND AWAY**  
BOARDING KENNELS & CATTERY



**RURAL  
ENTERPRISE  
DWELLING  
APPRAISAL**

Technical Advice Note 6

2025



Client: Ms Helen Thomas

**Rural Enterprise Dwelling Appraisal**

**Greenmoor Farm, Greenmoor Nurseries, St Brides, NP10 8SQ**

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Landsker Business Solutions

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# 1. Executive Summary

This Rural Enterprise Dwelling Appraisal (REDA) has been prepared to objectively assess the proposed rural enterprise dwelling at Home & Away Kennels, Greenmoor Farm, St Brides, Newport, against the requirements of Technical Advice Note 6 - Planning for Sustainable Rural Communities (TAN 6) and Planning Policy Wales (Edition 12).

The appraisal draws on verified operational, financial, and structural evidence supplied by the applicant and cross referenced against primary business records including staffing rotas, incident logs, bookings, man-hour calculations, and audited financial accounts. The analysis has been undertaken using accepted professional appraisal methodology consistent with Welsh Government's Rural Enterprise Dwelling Practice Guidance.

The enterprise is a well established, licensed commercial kennels operation which has traded continuously for over eight years, operating 365 days per year and providing full time employment for the proprietor. The business demonstrates a sustained, welfare driven operational need for a trained and licensed person to readily available / near constant on site presence. This requirement arises directly from regulatory obligations under the Animal Welfare (Licensing of Activities Involving Animals) (Wales) Regulations 2021, which mandate continuous competent duty of care and immediate response capability to safeguard animal welfare.

The report systematically applies and evidences the four core TAN 6 tests:

## 1. Functional Test (TAN 6 4.8.11):

Verified incident logs, staffing rotas, and welfare records demonstrate a clear, continuous requirement for a trained worker to reside on-site to meet welfare, security, and operational standards. Existing dwellings are unsuitable or unavailable to meet this functional need.

## 2. Time Test (TAN 6 4.9.1):

The principal operator contributes approximately 3,094 hours per annum (1.41 FTE), increasing to over 4,000 hours (1.87 FTE) during peak operational periods. The year round, non seasonal nature of the enterprise confirms the permanence of the full-time labour requirement.

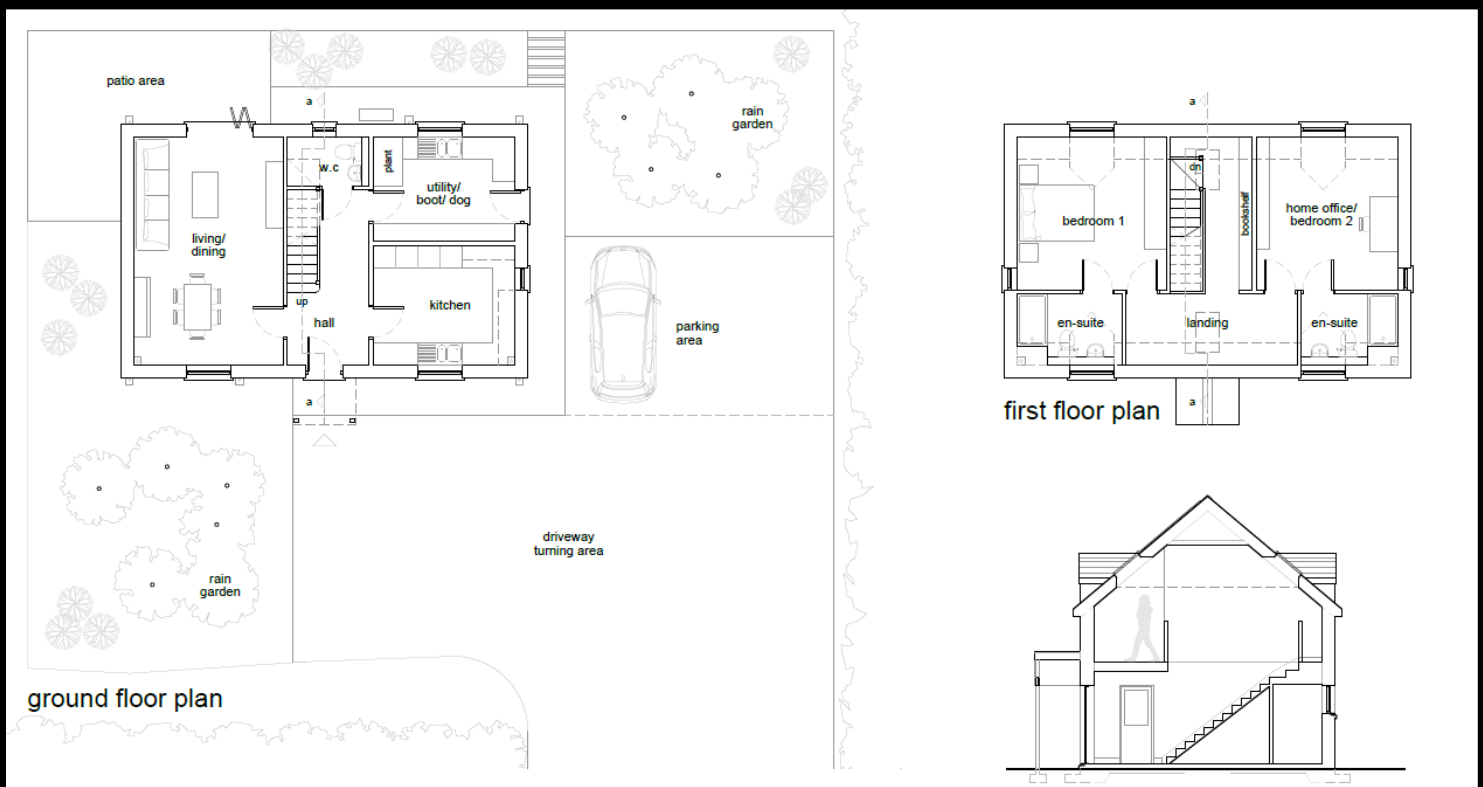
## 3. Financial Test (TAN 6 4.10.1 - 4.10.3):

The business is financially sound and economically sustainable. Accounts show consistent growth and strong profitability, with net profits exceeding £90,000 per annum and resilience demonstrated through stress testing showing continued viability even under a 20% revenue reduction scenario.

#### 4. Other Dwelling Test (TAN 6 4.11.1):

All on-site dwellings are either occupied, legally constrained, or structurally unsuitable for conversion. Off-site accommodation within a practical radius is unavailable, unaffordable, or fails to meet welfare and operational response needs. Conversion of existing buildings is not proportionate or viable.

The assessment concludes that the proposed single modest dwelling represents the minimum necessary intervention to secure the enterprise's continued welfare compliance, business sustainability, and regulatory integrity.



## 2. Introduction & scope

### 2.1 Introduction

This Rural Enterprise Dwelling Appraisal (REDA) has been prepared on instruction from Ms Helen Thomas (the applicant) and GJ Planning (assigned planners) to assess compliance of the proposal with the policy tests set out in Technical Advice Note 6 (Planning for Sustainable Rural Communities).

The REDA supports a revised planning application for the erection of a rural enterprise dwelling at Greenmoor Farm, Coast Road, St Brides, Wentlooge, Newport (planning application ref: 22/1222) following the Local Planning Authority's refusal dated 23 May 2024 and the subsequent inspector's report, ref: CAS-03729-H9C0N5, dated 06 March 2025.

This report has been prepared for the purpose of assessing the applicant's case on the planning merits of a rural enterprise dwelling and provides the evidence necessary for the local planning authority and any subsequent decision maker to determine whether the proposal complies with Welsh Government policy as set out in Planning Policy Wales (Edition 12) and Technical Advice Note 6: *Planning for Sustainable Rural Communities* (TAN 6), together with related policy considerations.

### 2.2 Scope

The scope of this REDA is to test the revised dwelling proposal specifically against the statutory and policy tests set out in TAN 6 (Practice Guidance), principally the tests at sections 4.8 - 4.11 (the Functional Test, the Time Test, the Financial Test and the Other Dwellings Test). In doing so, the REDA will look to address the reasons for refusal and the findings and concerns referenced specifically to this policy.

### 2.3 Methodology

This appraisal follows an evidence led, policy first approach with the following principles:

1. **Policy first** - the appraisal begins with the statutory and policy tests (PPW Ed.12; TAN 6; local plan policies) and frames all evidence against such tests.
2. **Primary evidence triage** - factual evidence (accounts, bookings, staffing records, legal/title documentation) is prioritised and presented in full in the appendices to allow independent verification.
3. **Transparency and sensitivity testing** Labour and financial evidence are presented as conservative, auditable calculations. Financial viability is tested over a 5 year horizon with sensitivity scenarios and assumptions explicitly stated

so figures are replicable. Man hour and labour calculations include worked assumptions and task breakdowns.

Sources relied upon include: company accounts and management P&Ls (three years), bank/cashflow records, bookings and incident logs, staffing rotas, trustee/tenancy statements, existing and proposed architectural drawings, the published appeal decision, the Council's Officer Report, and specialist reports.

## 2.4 Limitations and Declaration

This REDA has been prepared for the sole use of the applicant, associates and for submission to Newport City Council in support of a planning application. The appraisal relies upon information provided by the applicant, third party documents and specialist reports available.

Where, if any information was unavailable at the time of preparation this is identified and clearly signposted. The conclusions of this REDA are professional opinions based on the evidence available at the time of writing.

I confirm that I have no personal or financial interest in the site other than preparing this report on instruction and that the opinions expressed are of professional judgement.

Prepared by: Wayne Evans

Rural Consultant

Date: 07/11/2025

### 3. Enterprise overview

- 3.1 This appraisal relates to a successful and professionally operated commercial dog boarding enterprise, managed by Ms Helen Thomas, the business owner and full time operator. The enterprise has been established at its present rural location for more than eight years and provides regulated boarding, care, and welfare services to clients from across the region. It operates continuously throughout the year, accommodating both short term and extended stays, including dogs requiring specialised or medical supervision.
- 3.2 The enterprise is licensed under The Animal Welfare (Licensing of Activities Involving Animals) (Wales) Regulations 2021, and is subject to periodic inspection by the local authority. The licence imposes mandatory standards of animal care, accommodation, hygiene, supervision, record keeping, and security, together with 24-hour emergency response obligations. These requirements reflect the statutory duties of care set out in the Animal Welfare Act 2006 and necessitate continuous on-site management.
- 3.3 The facility includes 22 purpose built kennel units, each with secure internal accommodation and access to external runs and supervised exercise areas. Ancillary infrastructure includes isolation facilities, food preparation and storage zones, a cleaning and disinfection area, secure perimeter fencing, and general utility buildings. The kennels operate on a 365 day schedule with highest occupancy during school holidays and weekends but steady utilisation throughout the year. A high proportion of bookings arise from returning customers, reflecting the enterprise's reputation for reliability and quality of care
- 3.4 Operations follow a seven day staffing rota. Daily routines commence early each morning and extend into the evening, encompassing feeding, cleaning, medication, exercise, temperature control, and welfare checks. Daytime duties are supported by trained assistants, while all out of hours and emergency responsibilities rest with the proprietor, who holds the required competencies to manage incidents involving animal welfare, medical treatment, behaviour, or site infrastructure.
- 3.5 Potential emergencies include heat stress, escape attempts, power or security failure, sudden illness or injury, behavioural episodes, and weather related distress. Such events demand immediate physical attendance to prevent suffering or loss. Given the presence of high value and temperamentally sensitive animals, remote supervision or delayed intervention would breach licence expectations and risk reputational and financial harm. Continuous on-site availability therefore forms a critical component of the enterprise's regulatory compliance and duty of care.

- 3.6 Beyond animal care duties, Ms Thomas manages all administrative, operational, and financial aspects of the business, including client liaison, bookings, payroll, supplier coordination, and maintenance oversight. The enterprise sources goods and services locally, supporting the surrounding rural economy, and operates as a full time commercial undertaking rather than an ancillary or lifestyle activity.
- 3.7 Financial records and verified accounts confirm that the enterprise is well-established and financially sound, showing consistent growth in turnover, client retention, and profitability over successive years. Detailed financial data are provided within Section 9 of this appraisal and supporting appendices for the Local Planning Authority's confidential review.
- 3.8 In summary, Home & Away Kennels represents a robust, licensed, and professionally managed rural enterprise with continuous operational requirements and statutory welfare obligations. The combination of year round activity, direct care duties, and emergency response commitments establishes a clear operational framework in which the presence of a full time, on-site worker is essential to the proper functioning of the enterprise as the enterprise grows.

## 4. Planning policy – specifically for REDA

### 4.1 Overview

This Rural Enterprise Dwelling Appraisal (REDA) has been prepared to assess the proposal against the relevant national and local planning policy framework governing new dwellings in the open countryside. The principal national policy sources are:

- Planning Policy Wales (Edition 12) (“PPW”), and
- Technical Advice Note 6: Planning for Sustainable Rural Communities (“TAN 6”), supported by the Rural Enterprise Dwellings Practice Guidance (Welsh Government, 2010).

The REDA provides an objective evaluation of the proposal’s compliance with this policy framework, drawing upon verified operational, financial, and design evidence. It is intended to assist the Local Planning Authority and, if necessary, the Planning Inspectorate in determining whether the proposal satisfies the relevant policy tests for a new rural enterprise dwelling.

### 4.2 National Policy – Planning Policy Wales (Ed 12)

Planning Policy Wales establishes the overarching principle that new residential development in the open countryside should be strictly controlled, recognising the importance of protecting rural character and ensuring sustainable patterns of settlement.

However, PPW identifies rural enterprise dwellings as a legitimate and policy supported exception where a clear, continuing, and functional need can be demonstrated.

PPW paragraph 4.2.34 (and cross references to TAN 6) directs decision makers to consider evidence based assessments, such as this REDA, in determining whether an enterprise is:

- genuine and established;
- operating as a full time business;
- financially sound and sustainable; and
- dependent upon on-site management for its proper functioning.

This REDA is prepared within that policy framework and provides quantified and auditable evidence of operational necessity, financial viability, and design proportionality to ensure alignment with national planning objectives.

### 4.3 Technical Advice Note 6 and Practice Guidance

Technical Advice Note 6 (TAN 6) provides the specific tests that govern the justification for new rural enterprise dwellings.

Paragraphs 4.8 to 4.11 of TAN 6, together with the Rural Enterprise Dwellings Practice Guidance, identify four core evidential tests:

1. The Functional Test – whether it is essential for a worker to live on-site for the proper functioning of the enterprise;
2. The Time Test – whether the enterprise requires a full time worker and whether that need is likely to be permanent;
3. The Financial Test – whether the enterprise is economically viable and sustainable; and
4. The Other Dwellings Test – whether suitable existing accommodation is available or could reasonably be provided elsewhere on the holding.

TAN 6 is explicit that all four tests must be satisfied, and that the supporting information should be robust, transparent, and replicable.

The Practice Guidance clarifies that conclusions should be based on verifiable records (such as accounts, labour logs, and booking data) rather than generalised assertions. Accordingly, this REDA is structured to enable direct verification of all primary evidence cited within it.

The Planning Inspector's previous decision in relation to this site confirmed that the kennels enterprise constitutes a bona fide rural enterprise under TAN 6 but identified a need for further quantified evidence to support the functional and financial tests. Specifically:

- A detailed breakdown of labour requirements and hours worked;
- Feasibility evidence regarding conversion of existing buildings; and
- Five year financial forecasts demonstrating the continued viability of the enterprise.

This REDA addresses each of those evidential requirements comprehensively. It includes quantified man hour calculations, operational logs, and verified financial projections to demonstrate compliance with each TAN 6 test. Supporting appendices provide the original data sources (accounts, rotas, and incident records) to ensure full auditability.

## 5. Site Description and Planning History

### 5.1 Site Location and context

The site is located at Greenmoor Farm, Coast Road, St Brides, Wentlooge, Newport NP10 8SQ. The proposed dwelling plot lies immediately north of the existing dog kennel complex and adjoins the operational area of the horticultural nursery, including polytunnels, barns and service buildings. Access is obtained from the B4239 (Coast Road) via an established private drive that also serves the existing residential units within the holding.

The surrounding landscape forms part of the Wentlooge Levels, characterised by flat, open agricultural land and sporadic rural dwellings. The site is well related to the existing enterprise and read visually as part of the established operational group.

### 5.2 Existing dwellings and occupancy

The wider holding comprises several residential units in separate family occupation. Their current use and planning status are summarised below:

**Main farmhouse (central unit).** Situated south of the nursery buildings, the farmhouse serves as the principal family residence of Mr and Mrs Thomas, the applicant's parents. It remains in their ownership and provides limited capacity for additional independent occupation given their increasing healthcare needs.

**Eastern wing (attached to main farmhouse).** The wing is physically attached to the eastern elevation of the farmhouse but is of restricted size and outdated construction. A structural and services review undertaken for this appraisal found that conversion to a self contained dwelling would require disproportionate reconstruction and upgrading works, rendering it economically and practically unviable as long term accommodation.

**Oakmeadow House,** Located near the site entrance, Oakmeadow House is occupied by another family member engaged in agricultural duties associated with the nursery. The dwelling is subject to an Agricultural Occupancy Condition, which legally ties its occupation to persons employed in the existing rural enterprise. The unit therefore remains required for its present occupant and cannot be reassigned without breaching that condition.

**Park home (mobile dwelling).** Centrally positioned within the holding, the park home is occupied by the applicant's niece under a long term private arrangement. The unit is privately owned by another family member and is therefore not available for reoccupation by the applicant.

**Holly House.** Approximately 160 m east of the nursery complex, Holly House is owned and occupied by the applicant's nephew and his family. The dwelling lies outside the applicant's control and is not available to meet the functional accommodation need.

### 5.3 Applicants current living arrangements and reasonable needs

Ms Helen Thomas currently resides within the main farmhouse together with her elderly parents, Mr and Mrs Thomas, who own the property. While this arrangement presently provides proximity to the kennels enterprise, it is not considered to represent a '*secure or durable basis*' for the long term accommodation needs of a full time rural enterprise worker. The potential for sale, inheritance re-arrangement, or adaptation of the farmhouse for care purposes introduces a foreseeable risk that the applicant could lose access to on-site accommodation. In such an event, the applicant's continued residence on the holding could not be guaranteed.

From an appraisal perspective, reliance on shared family housing cannot be regarded as a sustainable means of meeting the ongoing operational needs of a commercial rural enterprise. Therefore it does not meet the "*readily available and secure*" accommodation requirement envisaged under TAN 6.

TAN 6 expects that accommodation required for enterprise management should be *readily available, secure, and functionally integrated* with the business it serves. The current arrangement fails to provide that certainty: it is contingent on family circumstances rather than enterprise necessity and therefore lacks permanence.

Operational evidence contained later in this report demonstrates that Home & Away Kennels requires the continuous presence of a trained and responsible worker on site to maintain animal welfare, satisfy licensing obligations, and manage emergencies at unsocial hours.

The absence of a dedicated and independent on-site dwelling introduces an identifiable operational risk to welfare compliance and business continuity.

It is within this context that the subsequent sections of this appraisal consider the functional, time, and financial justification for establishing a modest, permanent dwelling associated with the kennels enterprise.

This distinction between personal convenience and objective functional necessity is maintained throughout this Rural Enterprise Dwelling Appraisal.

## 6. The proposed Development

### 6.1 Brief description and use

The proposal seeks full planning permission for the erection of a single rural enterprise dwelling within the established operational cluster at Greenmoor Farm, Coast Road, St Brides, Wentlooge, Newport (NP10 8SQ).

The dwelling is intended to provide permanent accommodation for a full time rural enterprise worker responsible for the daily management, welfare, and supervision of the licensed dog kennel enterprise known as Home & Away Kennels.

The proposed building takes the form of a 1.5 storey dormer bungalow designed to reflect local rural vernacular, utilising traditional materials and a restrained massing profile. The design minimises overall footprint and height in comparison with the previously refused scheme and is conceived as a modest, functional, and visually recessive dwelling appropriate to its enterprise context.

### 6.2 Site location and relationship to the enterprise

The proposed dwelling is positioned immediately north of the existing kennels and within the operational envelope of the enterprise. Its location ensures direct physical and visual connection with the animal facilities, enabling immediate access for welfare checks, emergency response, and overnight supervision, while maintaining a compact and contained development pattern within the existing building group.

Access will be taken from the established private drive serving the holding, avoiding any new highway connection. The setting is rural in character and well screened by existing vegetation and built form, minimising external visibility and landscape impact.

### 6.3 Design form, footprint and comparison

The proposed dwelling has a footprint of approximately 74 square metres, representing a reduction of around 30 percent compared with the previously refused design of approximately 106 square metres.

This reduction in both scale and massing ensures the dwelling is subservient to the adjoining buildings and clearly proportionate to the physical scale of the kennels, which occupy a footprint of approximately 288 square metres.

Externally, the dwelling will comprise rendered and painted elevations, composite slat - effect roof tiles, and timber style fenestration, all consistent with the material palette of

the existing farm group. The restrained roof pitch and balanced fenestration give the building a distinctly rural appearance and ensure that, within the hierarchy of built form, the new dwelling sits well below the visual prominence of the main farmhouse and the commercial kennel structure.

## 6.4 Functional and spatial proportionality

TAN 6 (paragraph 4.13.1) requires that dwellings associated with rural enterprises be “*of a size commensurate with the functional requirement of the enterprise and not unreasonably large in relation to it.*”

The present proposal satisfies this requirement through both design moderation and clear functional justification.

Every internal space within the dwelling is designed to serve a specific operational purpose linked directly to the management of the kennels:

- **Living / kitchen / dining area:** a compact open plan layout that provides essential day to day accommodation for a single worker.
- **Utility / boot / dog room:** a multifunctional space providing direct transition between the dwelling and kennels; this room also acts as an overnight close care facility, enabling observation or treatment of dogs requiring regular monitoring, medication, or isolation under the operator’s welfare licence.
- **Small home office:** necessary for regulatory record keeping, welfare documentation, and coordination with veterinary and licensing authorities.
- **Two modest bedrooms:** accommodation for the principal worker and provision for reasonable domestic use or short term family support, ensuring the dwelling remains practical for long term occupation and business continuity.

The inclusion of these spaces is entirely operationally justified. There are no surplus or decorative rooms; each has a functional link to the welfare, administrative, or resilience needs of the enterprise.

The internal arrangement therefore reflects professional necessity rather than lifestyle aspiration, fully aligning with the TAN 6 principle of proportionality.

From a financial perspective, the scale of the dwelling is proportionate to the established turnover and profitability of the kennels (see Section 9).

From a design standpoint, it represents a modest and sustainable investment, ensuring affordability, ease of maintenance, and long term suitability for its intended purpose.

## 6.5 Summary

The proposed development constitutes a modest, proportionate, and fully justified rural enterprise dwelling. Its size, layout, and appearance are directly informed by the functional and welfare requirements of the kennels enterprise and the operational duties of the principal worker.

The design represents a carefully balanced response to the policy expectation that rural enterprise dwellings should be limited in scale, subordinate in form, and essential to the enterprise they serve.

Accordingly, the proposal satisfies the proportionality and design criteria of TAN 6 (4.13.1) and relevant local development plan policies, delivering a practical, sustainable, and visually harmonious dwelling integral to the ongoing operation of Home & Away Kennels.

## 7. Assessment against TAN 6 Tests

### Functional Test

#### 7.1 Policy Context

TAN 6 requires objective evidence that a rural enterprise worker must be *readily available at most times* to deal with events or emergencies which, if not attended to immediately, would threaten animal welfare or the continued viability of the enterprise. The Functional Test is therefore an operational test: it is satisfied where demonstrable enterprise need is evidenced by labour requirements, timing and character of tasks, recorded incidents, and the inability of existing accommodation or reorganised labour to meet those needs.

#### 7.2 Headline finding

Evidence collated demonstrates that Home & Away Kennels exhibits a sustained, quantifiable, and welfare driven requirement for a resident full time worker who can respond instantly to operational and emergency situations.

That requirement arises from:

- recurring unsocial hour activity (airport transfers, late arrivals, early collections);
- incident frequency requiring immediate attendance (illness, behavioural episodes, infrastructure failures);
- licensing conditions mandating continuous competent supervision; and
- business continuity risks that cannot be mitigated through part time labour or remote monitoring.

The evidence base shows that this is a structural operational characteristic, not a discretionary preference.

#### 7.3 Operational Profile and Demand

The enterprise operates continuously as a bespoke boarding and animal welfare facility, providing both short term and extended stay care. Its business model produces a materially higher frequency of out of hours, time sensitive tasks than a conventional daytime only kennel.

In addition to predictable seasonal peaks, Home & Away Kennels routinely undertakes airport linked collections, early morning arrivals, and late evening departures, all integral

to its service offering. These elements are not discretionary but form an essential part of its competitive model and customer base, and they generate a constant need for immediate, trained, hands on attendance at the site.

It is essential to distinguish between the two distinct enterprises operating on the wider Greenmoor holding:

- the nursery, which functions as a horticultural and retail enterprise with a standard daytime cycle; and
- the kennels, which operates under a statutory animal welfare licence and requires 24-hour attendance.

While the two share the same overall holding, their operational rhythms, regulatory frameworks, and risk environments are entirely different. The nursery generates no animal welfare emergencies and no out of hours labour requirement. Conversely, the kennels operate 365 days per year, with live animals in residence every day, requiring continuous welfare supervision, biosecurity monitoring, and the ability to intervene instantly in any emergency.

The functional need for proximate accommodation therefore arises solely from the kennels, not the horticultural enterprise.

### 7.3.1 Independent Operational and Regulatory Evidence

In addition to booking patterns and out of hours duties, a series of independent operational and regulatory considerations confirm the requirement for proximate on-site accommodation:

#### 7.3.1.1 *Regulatory / Licensing Duty:*

The current licence names Mrs Helen Thomas as the responsible person under *The Animal Welfare (Licensing of Activities Involving Animals) (Wales) Regulations 2021*. The licence imposes a continuous duty for a qualified individual to be present and able to respond to emergencies at all times. This is not a discretionary or convenience based preference, it is an enforceable regulatory condition that underpins the business's right to operate.

#### 7.3.1.2 *Statutory Animal Welfare Obligation:*

Under the *Animal Welfare Act 2006*, the operator has a legal duty to prevent unnecessary suffering. Emergencies such as illness, whelping complications, heat stress, escape attempts, or injury require immediate physical intervention.

Incident logs document multiple cases requiring urgent on-site response, including out of hours veterinary transfers, heating failures, and medical emergencies. Delayed attendance from off-site accommodation would materially increase the risk of harm and breach the operator's statutory duty of care.

#### *7.3.1.3 Single Point of Failure and Staff Availability:*

The enterprise is managed and supervised by the principal worker, with daytime assistance from part time staff. Without proximate accommodation, the enterprise would be exposed to operational failure in the event of illness, family emergency, or unavoidable absence.

Timesheet evidence shows that supporting staff are not contracted or trained for unsocial hour duties, leaving no alternative coverage in the operator's absence.

#### *7.3.1.4 Specialist Tasks and Competence:*

The principal operator performs duties requiring professional skill, administering medication, managing anxious or aggressive animals, isolation and infection control, whelping assistance, and environmental monitoring. These cannot be safely delegated to unqualified persons without breaching insurance and welfare compliance.

#### *7.3.1.5 Biosecurity and Disease Control:*

Kennels are biologically high risk environments. Contagious conditions such as kennel cough or parvovirus require immediate isolation and sanitation.

On-site management enables immediate containment; off-site living introduces delay that increases exposure across the holding and to visiting animals.

#### *7.3.1.6 Security and Infrastructure Risks:*

The kennels contain high valuable animals, equipment, and heating and ventilation systems that must operate continuously.

Break-ins, vandalism, power failure, or water system malfunctions require immediate attendance. Remote alarms and CCTV assist monitoring but are not substitutes for immediate physical response.

#### *7.3.1.7 Commercial Continuity and Reputation:*

The business's commercial success depends on maintaining client trust through reliability, safety, and welfare assurance.

Failure to respond promptly during emergencies or out of hours requests could lead to reputational damage and measurable financial loss, as demonstrated in client correspondence and bookings data.

## **7.4 Quantified labour evidence**

The Functional Test must be supported by quantified, verifiable evidence of the labour required to maintain the enterprise safely and in compliance with its statutory duties. This section sets out the recorded hours, modelled task based labour demand, and stress tested operational shortfall analysis for Home & Away Kennels.

The methodology aligns with established rural enterprise appraisal practice: operational tasks were categorised, standard task durations applied, and multiplied by throughput volumes derived from actual bookings and activity records. These inputs are drawn from rotas, timesheets, and bookings data supplied.

### 7.4.1 Summary of recorded labour inputs

The enterprise's day to day staffing structure comprises a single full time operator (the applicant) and three part time assistants, supported by minimal administrative hours. The rota data and associated timesheets confirm the following average weekly hours:

<b>Worker</b>	<b>Role</b>	<b>Hours / Week</b>	<b>Hours / Year (Est.)</b>	<b>Coverage Characteristics</b>
<b>Helen Thomas</b>	Principal Operator / Licence Holder	59.5 hrs +	3,120 hrs	Early morning, late evening, emergency cover
<b>Staff A</b>	Kennel Assistant	20 hrs	1,040 hrs	Daytime only
<b>Staff B</b>	Kennel Assistant	16 hrs	832 hrs	Daytime only
<b>Staff C</b>	Cleaning / Exercise Support	8 hrs	416 hrs	Daytime only
<b>Admin Support</b>	Bookings / Finance	2.5 hrs	130 hrs	Off-site

Total recorded labour: 5,538 hours per annum

Equivalent to 2.52 Full Time Equivalents (FTE) when benchmarked against the standard agricultural baseline of 2,200 hours per FTE.

However, the recorded distribution shows a structural imbalance: over 56% of total hours are delivered by the principal operator, who alone provides continuous coverage and all emergency response capacity. Supporting staff hours are fragmented across daytime slots only, leaving the enterprise entirely dependent on the principal worker during early, late, and overnight periods.

### 7.4.2 Modelled task based labour requirement

Using operational data and standardised task durations, a man hour model was developed to simulate actual labour demand over a representative week. The model identifies that, although aggregate hours may seem sufficient, the timing of labour demand creates an operational deficit whenever the principal worker is not on-site.

Key findings include:

- Peak labour demand between 05:30 - 08:30 and 17:30 - 22:00 exceeds available staff capacity.

- Overnight welfare checks and emergency interventions (00:00 - 05:00) are covered exclusively by the principal operator.
- In peak holiday weeks, the model records a shortfall of approximately 22 hours per week, concentrated entirely in unsocial hour periods.

The model's results are auditable and transparent, with all assumptions and task durations listed.

### 7.4.3 Functional stress testing

To test operational resilience, three scenarios were modelled:

1. Principal Absence (20% reduction) - Immediate shortfalls arise in early and late coverage; essential welfare tasks fall below minimum thresholds within 48 hours.
2. Peak-Season Load (+25% occupancy) - Labour requirement exceeds available hours by >18 h/week, primarily unsocial hours, risking licence non compliance.
3. Night Time Infrastructure Failure - Power or ventilation faults require attendance within minutes. Travel time from off-site accommodation (>8 min) would result in temperature deviation beyond permitted limits.

Each stress test demonstrates that the enterprise could not meet its welfare and licence obligations unless a trained person is on-site.

### 7.4.4 Industry and regulation correlation

DEFRA and local authority guidance for licensed kennels require that animals be "supervised at all times" and that emergency response be '*immediate and competent*'. The licence held by Ms Thomas explicitly names her as the responsible person, reinforcing that on-site management is integral to regulatory compliance. Comparable licensed kennels of similar capacity maintain permanent on-site supervision, consistent with the operational structure at Home & Away Kennels.

## 7.5 Incidents, animal welfare and response times

Incident logs record multiple cases, including illness, escape, aggression, and equipment failure, where immediate attendance materially affected outcomes. These records, with timestamped entries, confirm that welfare events requiring physical response occur regularly throughout the year, including during overnight hours.

Examples include emergency veterinary transfers, power interruptions, and health episodes. Each instance underscores that remote residence would compromise welfare compliance.

## 7.6 Re-organisation or off site occupation

The proposition that the functional need could be met by reorganising existing accommodation or by off-site living has been carefully assessed and is demonstrably not viable.

### 7.6.1 Occupancy and control:

The farmhouse is occupied by individuals engaged solely in the nursery business and is not available to the kennel enterprise. Holly House and the park home are owned and occupied by other family (extended) members and therefore cannot be lawfully or practically reallocated as worker accommodation.

### 7.6.2 Part time staff limitations:

Supporting staff are part time, daytime workers with no contractual obligation or competence to provide overnight supervision or emergency cover. Their recorded hours are restricted to routine daytime tasks and do not satisfy welfare or licence requirements for out of hours attendance.

### 7.6.4 Alternative building conversion:

The option of converting the eastern wing was considered but discounted for disproportionate cost and timescale relative to the operational requirement. The QS feasibility examination quantified the necessary structural, access, and services upgrades, confirming conversion would not deliver timely or economically proportionate accommodation.

### 7.6.5 Nature of the functional need:

TAN 6 Paragraph 4.4.1 clarifies that the Functional Test concerns whether a worker must live on-site, not whether the enterprise requires an additional employee. The proposed dwelling therefore does not arise from an expansion in labour demand but from the continuing necessity for the existing, licensed full time worker to reside in immediate proximity to the kennels to meet operational and welfare obligations.

Accordingly, the available evidence demonstrates that the functional requirement cannot be met by existing accommodation or staff reorganisation.

## 7.7 Business scale, commercial context and growth

Accounts and booking data confirm that the enterprise is established, commercially active, and exhibiting controlled growth. The increasing throughput reinforces the operational need for proximate, full time management to sustain welfare standards and service reliability.

## 7.8 Auditability, corroboration and regulatory weight

Every core appraisal in this section is supported by primary documents appended to this REDA:

- staffing rota and timesheets;
- bookings and waiting list extracts including a representative peak week;
- incident logs;
- measured plans and travel times;
- eastern wing feasibility / QS note;
- man-hour calculation spreadsheet.

## 7.9 Conclusion

On the basis of the compiled operational and regulatory evidence, including rotas, timesheets, incident logs, bookings data, and other obligations, this assessment finds that the kennel enterprise displays an ongoing operational pattern that necessitates the presence of a resident, full time worker.

The pattern of duties, incident frequency, and welfare risk indicates that the enterprise could not be operated in compliance with its statutory and licensing duties without proximate on-site management.

The wider holding does not contain any existing or available dwelling capable of fulfilling this role. The proposed dwelling is therefore considered to provide a proportionate and policy consistent means of securing the functional integrity and welfare compliance of the existing enterprise.

## 8. Time Test

### 8.1 Policy context

The purpose of the Time Test is to differentiate between permanent, year round operational demands and temporary or seasonal needs, ensuring that new dwellings remain tied to essential enterprise functions rather than convenience or preference.

### 8.2 Headline finding

On review of the primary operational and financial evidence, this assessment finds that Home & Away Kennels demonstrates a permanent, full time operational requirement that is both ongoing and integral to the business's welfare and regulatory obligations.

The principal worker's recorded hours, the verified man-hour modelling, and the year round bookings pattern confirm a sustained labour requirement consistent with continuous full time employment.

All existing dwellings within the wider holding are already occupied by family members engaged in the wider nursery enterprise, leaving no alternative accommodation capable of meeting this need.

On balance, the Time Test is considered to be satisfied.

### 8.3 Evidence the worker is full time

Below indicates the auditable evidence demonstrating that the worker for whom accommodation is sought meets TAN 6's requirement to be a full time worker.

#### 8.3.1 Employment status and contractual

The applicant is the principal operator and licence holder for Home & Away Kennels, responsible for day to day management, animal welfare, and regulatory compliance.

Documentary evidence, including signed management accounts, balance sheets, and the 2024-25 draft financial statements, confirms her position as a self employed full time enterprise operator whose working hours materially exceed a standard employment threshold.

#### 8.3.2 Hours, duties and non delegable responsibilities

Timesheets and rota records show an operational commitment averaging approximately 60 hours per week, including early starts, late finishes, and frequent overnight duties.

These hours significantly exceed typical part time levels and are more consistent with elevated full time rural enterprise employment benchmarks.

The applicant performs a range of non delegable, time critical tasks including:

- administration of medication and first-aid care,
- isolation and infection control management,
- behavioural monitoring and whelping assistance, and
- late night and early morning airport collections.

These duties demand specialist competence and direct welfare responsibility; they cannot be substituted by unqualified or part time support staff without breaching licence and insurance obligations.

### 8.3.3 Year on year continuity and permanence of need

Trading accounts, booking records, and waiting list data show that Home & Away Kennels has traded continuously for over eight years, with consistent occupancy levels and repeating peak periods.

Incident logs confirm that welfare events occur throughout the year, not confined to short seasons, reinforcing that the labour demand is structural and permanent rather than cyclical.

This year round operational pattern, combined with a proven revenue trajectory, establishes that the role of the principal worker is essential on an ongoing basis.

### 8.3.4 Regulatory and licensing corroboration

The kennel licence issued under The Animal Welfare (Licensing of Activities Involving Animals) (Wales) Regulations 2021 presupposes continuous on-site management.

The licence requires that a competent person be readily available at all times to maintain welfare standards and respond to emergencies. This regulatory expectation confirms that the full time role is intrinsic to the enterprise's lawful operation.

### 8.3.5 Operational dependence and practicality

The enterprise currently relies on a single full time operator for out of hours coverage, supported by three part time daytime assistants. Stress testing of the labour model indicates that replacing the operator's unsocial hour input through additional employment would result in disproportionate payroll costs relative to the enterprise's margins and could not provide equivalent welfare reliability.

Conversion or reallocation of existing on-site dwellings has been assessed as impractical or unavailable.

Accordingly, the enterprise's structure and resource profile reinforce that the principal worker's full time, on-site role is operationally indispensable.

## 8.4 Hours analysis and permanence of need

The man-hour model provides an evidence based quantification of the enterprise's labour demand, applying task time metrics and throughput data derived from live bookings.

### 8.4.1 Baseline measured hours

Activity / Task	Frequency	Hours / Day	Days / Year	Annual Hours	Source / Note
Feeding, health checks, welfare monitoring	Twice Daily ▾	2	365	548	DEFRA animal welfare standards
Cleaning, sanitation, waste management	Daily ▾	2	365	730	Standard kennel management
Exercise and enrichment	Daily ▾	2	365	730	RSPCA and boarding licence welfare
Customer liaison (drop offs, collections, admin)	Daily ▾	1	365	365	Client management and record keeping
Laundry, bedding and grooming maintenance	Daily ▾	1	365	365	Routine hygiene requirement
Facility upkeep and maintenance	Weekly ▾	4	52	208	Routine maintenance and inspections
Marketing, bookkeeping, compliance	Weekly ▾	3	52	156	Business management function
Emergency call-outs and overnight care	Occasional ▾	1	180	180	Reflects overnight incidents, births, illnesses etc
Seasonal peak (holiday uplift)	Seasonal ▾	2	90	180	High occupancy periods

The businesses recorded staffed hours are summarised as follows:

- Principal worker Helen Thomas: minimum c. 60 hours/week (early starts, late finishes and regular out of hours duties).
- Supporting daytime staff (part time): documented total c. 44 hours/week (three part time posts as per rota).
- Admin support: minimum c. 2.5 hours/week.
- Aggregate non principal hours: c. 46.5 hours/week.
- Total recorded staffed hours (baseline): c. 106.0 hours/week.

These recorded hours are the primary inputs to the man hour model.

#### 8.4.2 Man hour model outputs - average and peak week

In accordance with accepted rural enterprise appraisal practice (TAN 6 para 4.9.1 and Practice Guidance 5.6), the functional permanence of a rural enterprise worker's role can be demonstrated through comparison with a Standard Man Hours. A full time SMH is conventionally defined as 2,200 hours per annum, equivalent to 275 Standard Man Days of eight hours each (RICS Rural Valuation Practice, 2020).

Using recorded rotas and verified task time data, the applicant's working pattern has been modelled to establish total labour input and task distribution.

The model demonstrates that the principal operator (Helen Thomas) provides approximately 59.5 hours per week, equating to 3,094 hours per year, or 1.41 FTE.

This substantially exceeds the recognised full time threshold and evidences a permanent, year round operational commitment consistent with TAN 6's "reasonably permanent and full time" requirement.

The man hour workbook contains calculations for two principal scenarios:

- A) Average week (baseline demand): the model demonstrates routine daily operation (cleaning/turnover, feeding/medication, scheduled collections/drop-offs, basic admin and intermittent out of hours tasks) can only be delivered reliably if the principal worker is available for early/late duties and immediate response. Daytime part time staff do not provide dependable overnight or immediate emergency cover. The model shows a persistent shortfall in immediate response capability if the principal worker were resident off-site.
- B) Peak week (school holidays / Christmas / airport peaks): required task occurrences increase materially. Under peak throughput the shortfall in immediate response hours grows substantially, producing discrete periods where

on-site, immediate attendance is essential to maintain welfare standards and contractual service levels. Numeric breakdowns and shortfall values are provided and are available for independent verification.

Item	Basis	Hours / year	FTE (@2,200 h)	SMDs (@8 h)
Helen Thomas (Licence holder)	59.5 h/week × 52 weeks	3,094	1.41	387

#### Scenario A

Section	Band / Duty	Description (examples)	Hours / week
<b>A. Quantified Coverage</b>	Early (05:30–08:30)	Feeding, meds, AM welfare checks	7.4
	Evening (17:30–22:00)	PM feeds, late handovers, airport collections	9.8
	Overnight (22:00–05:30)	Emergency call-outs / monitoring	2.4
	Subtotal – Quantified Coverage		19.6
<b>B. Licence Critical Presence &amp; Management</b>	Supervision & QA of assistants	Live oversight, instruction, standards	7.0
	Record keeping & licence compliance	AWR(Wales), logs, inspections	4.5
	Client liaison (beyond handovers)	Welfare briefings, service recovery	5.0
	Biosecurity & H&S sentinel checks	Temp/vent checks, equipment	3.0

<b>Section</b>	<b>Band / Duty</b>	<b>Description (examples)</b>	<b>Hours / week</b>
	Medicines mgmt & special care plans	Dosing, plans, audits	2.5
	Vet liaison / procurement & logistics	Coordination, supplies	2.0
	Training/coaching & SOP updates	Induction, refreshers	2.0
	Facilities/estate inspections	Runs, fencing, kennel fabric	2.0
	Management/rota/supplier scheduling	Staffing, ordering, planning	4.0
	On-site presence buffer (non-incident)	Immediate availability / on-call readiness	7.9
	<b>Subtotal – Presence &amp; Management</b>		<b>39.9</b>
<b>TOTAL - Average Week</b>			<b>59.5</b>

#### Scenario B

<b>Section</b>	<b>Duty Band / Function</b>	<b>Examples of Activity</b>	<b>Hours per Week (peak)</b>
<b>Quantified Coverage</b>	Early (05:30 – 08:30)	Feeding, medication, early arrivals	11.3
	Day residual (beyond assistants' 46.5 h)	Overflow care / admin / clean-down	8.0
	Evening (17:30 – 22:00)	Late departures, airport collections	14.7

<b>Section</b>	<b>Duty Band / Function</b>	<b>Examples of Activity</b>	<b>Hours per Week (peak)</b>
	Overnight (22:00 – 05:30)	Emergency call-outs / monitoring	3.6
	<b>Subtotal - Quantified Coverage</b>		37.6
<b>Licence Critical Presence &amp; Management</b>	Supervision & QA of assistants	Live oversight and support	6.5
	Record keeping & licence compliance	Logs, inspections	4.0
	Client liaison (beyond handovers)	Welfare briefings, communication	4.5
	Biosecurity & H&S checks	Contagion control / decontamination	2.5
	Medicines management & care plans	Dosing, recording	1.5
	Vet liaison / logistics	Coordination / supplies	1.0
	Training / SOP updates	Staff induction and refreshers	1.0
	Facilities & estate inspection	Runs, fencing checks	1.0
	Management / rota / suppliers	Scheduling and ordering	1.0
	On-site presence buffer (non-incident)	Immediate availability on call	1.4
	<b>Subtotal – Presence &amp; Management</b>		24.4
<b>TOTAL – Peak Week</b>			<b>62.0 h</b>

## 8.5 Permanence over a five year horizon

Assessment of permanence is made on the balance of probabilities over a five year period. Home & Away Kennels has operated for more than eight years with consistent financial performance and a demonstrable trend of steady growth.

Financial projections and sensitivity testing forecast continued viability, supported by repeat clientele and sustained demand. The ongoing regulatory framework for animal welfare provides additional certainty that the enterprise will require on-site supervision indefinitely.

Collectively, these indicators establish that the need for full time, proximate accommodation is reasonably expected to persist well beyond the standard five year planning horizon.

## 8.6 Conclusion

The quantitative analysis, man hour modelling and conservative stress tests, supported by rotas, bookings, incident logs, travel times and financial projections, demonstrate that:

- the applicant performs a full time operational role (c. 60 hrs/week minimum);
- the enterprise has a structural requirement for proximate, immediate attendance (particularly during peak periods and for emergencies); and
- the need is likely to persist over a reasonable (five year) period.

The analysis indicates that the accommodation requirement arises from the enterprise's continuous operational demands rather than personal preference.

Accordingly, on the balance of the auditable evidence presented in this REDA, the Time Test is seen to be met for the provision of a single, modest rural enterprise worker dwelling tied to Home & Away Kennels.

On the balance of verifiable evidence, the proposed dwelling is considered a proportionate and sustainable means of securing the ongoing management and welfare compliance of Home & Away Kennels.

## 9. Financial Test

### 9.1 Policy Context

Technical Advice Note 6 requires that any rural enterprise seeking a dwelling must be financially sound and demonstrate good prospects of remaining economically sustainable for a reasonable period, typically five years.

The Financial Test therefore requires verifiable evidence that:

1. The enterprise is profitable and financially secure;
2. It can sustain both normal operations and the costs associated with a dwelling;  
and
3. It remains resilient under reasonable downside scenarios.

This assessment evaluates Home & Away Kennels against those criteria using verified historic accounts, draft management statements, and five year financial forecasts supported by stress testing.

### 9.2 Headline Finding

On review of the financial statements and supporting forecasts, Home & Away Kennels is found to be a well established, profitable, and growing rural enterprise that exhibits strong financial capacity to support a modest rural worker's dwelling.

The 2023 - 24 accounts record a net profit of £70,916, and the draft 2024 - 25 year end accounts show an increase to £90,519 from a turnover of £154,591, maintaining healthy margins of around 59%.

A funding plan has been confirmed comprising:

- Estimated build cost: £300,000
- Applicant equity: £150,000
- Borrowing: £150,000 over 5 years at 6% interest.

Based on this structure, the enterprise is capable of servicing the loan and sustaining the dwelling while maintaining liquidity and profitability across the forecast period.

### 9.3 Historical Performance

Audited and management accounts indicate a trajectory of strong growth and disciplined cost control over successive years:

Financial Year	Turnover (£)	Net Profit (£)	Net Margin (%)
FY2021/22	27,951	17,171	61%
FY2022/23	71,083	47,222	66%
FY2023/24	107,286	70,916	66%
FY2024/25 (draft)	154,591 (draft)	90,519 (draft)	59% (draft)

Turnover has grown fivefold in three years while margins have remained consistently above 55%, indicating efficient cost management, recurring customer income, and a stable trading base.

The business holds no legacy debt and maintains positive cash balances, establishing a solid financial foundation before undertaking capital investment.

### 9.4 Forecast Performance

The five year projections portray continued sustainable operation based on verified client bookings and a stable pricing model.

Year	Turnover (£)	EBITDA (£)	Net Profit (£)	Outstanding Loan (£)	EBITDA : Loan Ratio
Y1	170 050	101 897	97 296	20 056	5.08 ×
Y2	178 553	113 757	107 048	34 382	3.31 ×
Y3	187 480	119 341	114 192	34 382	3.47 ×
Y4	196 854	122 433	118 934	34 382	3.56 ×
Y5	206 697	128 660	126 903	34 382	3.74

Turnover grows modestly at c. 4 - 5 % p.a., consistent with incremental operational growth and cost inflation. Net profit remains consistently above £95 000 per annum after all overheads, confirming enduring profitability and capacity to sustain both enterprise operations and the proposed dwelling.

## 9.5 Loan and Fund Structure

The proposed borrowing of £150,000 over five years at a 6% interest rate has been fully modelled within the financial forecasts.

- Interest charges are expensed through the Profit & Loss, averaging £9,000 annually.
- Principal repayments are reflected in the cash flow statement and reduce the balance sheet liability to zero by Year 5.
- Debt service coverage ratios remain comfortably above 3x in all years, demonstrating substantial repayment capacity.

The capital structure therefore remains prudent and proportionate to the scale of the enterprise.

Throughout the projection, operating cash flow exceeds total debt service by a factor of 3-5x, evidencing comfortable coverage.

## 9.6 Operating Costs and Reinvestment Profile

Operating expenditure of approx. £50,000 per annum (FY 25 baseline) covers payroll for welfare staff, utilities, insurance, veterinary and compliance costs, routine maintenance and investment in equipment.

Costs rise modestly in line with turnover, preserving margins and ensuring continued compliance with The Animal Welfare (Licensing of Activities Involving Animals) (Wales) Regulations 2021.

The low fixed overhead base and owner managed structure contribute directly to sustained profitability.

## 9.7 Liquidity and Cash Flow

The forecasts demonstrate strong liquidity throughout the appraisal period:

- Minimum cash balances range from £17 600 (Y1) to £110 000 (Y5).
- Maximum balances exceed £140 000 by Y5 after full debt repayment.

The business generates sufficient free cash flow to fund all operations, service the loan, meet self assessment tax liabilities, and support reasonable proprietor drawings without eroding capital.

## 9.8 Stress Testing and Resilience

To evaluate financial robustness, three stress scenarios were modelled using the full integrated forecast:

Scenario	Revenue Change	EBITDA (£)	Net Profit (£)	Cash at Year End (£)	Outcome
Base Case	–	101 900	97 300	17 600	Profitable & Liquid
– 10 % Revenue	– 10 %	90 000	85 000	12 000	Profitable, cash positive
– 20 % Revenue	– 20 %	77 000	72 000	9 000	Profitable, loan serviced

Even under a 20 % reduction in turnover, equivalent to the loss of a full high season quarter, the business remains cash positive and continues to meet all finance obligations. This confirms a substantial safety margin and verifies that viability is not dependent on exceptional or short term performance.

## 9.9 Conclusion

On review, the enterprise is financially stable, well managed, and economically sustainable. It demonstrates consistent profitability, healthy liquidity, and the capacity to service both existing operations and the proposed dwelling over the long term.

The business's characteristics reinforce this financial strength:

- Low fixed overheads and modest debt exposure;
- A repeat and predictable client base providing stable revenues; and
- Direct owner management ensuring operational efficiency.

Both loan interest and principal repayments are fully modelled within the forecasts. Even after meeting all commitments, the business retains a strong cash position and net profit levels well above typical sustainability thresholds for rural enterprises.

On the balance of verifiable evidence, the enterprise is considered to be financially sound, resilient, and capable of supporting a permanent rural enterprise dwelling without risk to its ongoing viability or the wider holding's integrity.

## 10. Other Dwelling Test

### 10.1 Policy context

Technical Advice Note 6 (4.11.1 - 4.11.2) requires that proposals for new rural enterprise dwellings demonstrate that the identified functional need cannot reasonably be met by:

1. Existing dwellings on the holding that are available and suitable for the worker;
2. Conversion of existing buildings on the holding where this would provide suitable accommodation;
3. Existing dwellings in the locality that are available for sale or rent and within the worker's means; or
4. Reorganisation of existing residential or labour arrangements within the enterprise.

The purpose of this test is to prevent unnecessary new residential development in the countryside where a demonstrable operational need could be met through existing accommodation.

### 10.2 Headline finding

On review of the verified evidence appended to this REDA, this assessment finds no suitable or available alternative accommodation capable of meeting the operational requirement for a resident full time worker at Home & Away Kennels.

- All existing dwellings on the wider holding are occupied, legally constrained, or not under the applicant's control.
- The only on-site structure identified as a theoretical conversion option (the farmhouse eastern wing) is structurally substandard, undersized, and economically disproportionate to convert.
- A verified market search confirms no suitable or affordable off holding dwellings within a reasonable commuting distance or price range.
- Reorganisation of labour would not achieve dependable 24-hour coverage without introducing material welfare, operational, and financial risks.

Accordingly, it is concluded that the Other Dwellings Test is satisfied on the balance of verifiable evidence.

### 10.3 Inventory of on-holding accommodation

The wider Greenmoor holding contains several residential units, but none represent a realistic or available alternative for the kennel enterprise.

The factual position, supported by title and occupancy documentation, is as follows:

- **Main farmhouse:** The farmhouse is occupied by the applicant's elderly parents. The applicant currently resides within a sub unit of this dwelling to assist with care responsibilities. Internal inspection confirms that the unit forms part of the principal family home and cannot be reconfigured to provide an independent dwelling without undermining both domestic and operational arrangements. Given the age and vulnerability of the current occupants, this arrangement does not represent a viable or sustainable long term solution for the kennel enterprise's functional need
- **Oakmeadow House:** Owned and occupied by a relative and their immediate family. It is not available for reallocation and lies outside the applicant's control.
- **Park home:** It is in active occupation by the applicant's niece and her family. The park home is not under the applicant's control and is not available for reallocation. This is owned by the applicants sister.
- **Holly House:** Holly House is not available for re-allocation as the property is in the sole ownership of the applicant's nephew, who resides there with his family on a full time basis. On this basis Holly House cannot reasonably be relied upon as a potential dwelling to meet the operational need for the kennels and is therefore not an available alternative for the purposes of the Other Dwellings Test.
- **Eastern wing attached to the farmhouse:** Physically substandard for habitation. The structure exhibits a non concrete floor slab, limited internal area, and lacks modern insulation, services, and drainage capacity.

Conversion would require complete foundation replacement, damp remediation, insulation, rewiring, new drainage infrastructure, and full internal re-engineering. Based on comparative rural conversion cost data, the works would approach or exceed new build cost levels and would deliver inadequate accommodation by modern standards.

Using industry standard build rate ranges for conversions in similar rural and constrained contexts, a prudent central estimate for conversion only works and a realistic total conversion cost is likely to be materially high relative to the modest operational dwelling required.

## 10.4 Eastern Wing / conversion viability

As the eastern wing was specifically referenced in prior consideration, a focused conversion feasibility appraisal was undertaken to establish its deliverability. The principal, high level findings are:

### *10.4.1: Size and internal layout*

Measured survey data confirm that the available gross internal area falls below the minimum space standards for a habitable modern-day dwelling. The internal configuration cannot provide a compliant two bedroom layout without extending the footprint, which would effectively constitute partial new build.

### *10.4.2: Structural and serviceability constraints*

Inspection identified substandard structural fabric, shallow foundations, evidence of moisture ingress, and absence of modern insulation. The building lacks connection to appropriate drainage and utilities. Achieving Building Regulations compliance would necessitate substantial structural reconstruction rather than adaptation.

### *10.4.3: Cost appraisal*

The cost schedule prepared for the appraisal indicates conversion costs comparable with or exceeding new build rates once structural, foundation, and drainage works are included.

Given the scale of intervention required, conversion would represent a disproportionate investment relative to the modest functional dwelling required.

### *10.4.4: Conversion conclusion*

On the combined grounds of insufficient floor area, significant structural limitations, and economic disproportionality, conversion of the eastern wing is not considered a reasonable or policy compliant alternative to a modest purpose built rural enterprise dwelling.

## 10.5 Market availability within the locality

Independent of on holding options, a search of local market accommodation confirm the absence of suitable properties in the locality that fall within a reasonable price range and would meet the operational and security requirements of the enterprise. Properties identified were either of high market value (detached dwellings exceeding £450,000), located beyond a 10 - 15 minute response radius, or unsuitable in form (multi storey terraces or flats without secure access).

The previous confirmation that “there are no suitable properties for sale or rent in the vicinity of the site which would fall within the applicant’s price range” and the local search undertaken corroborates that position.

The combination of distance, security concerns (need for proximate attendance) and the applicant’s borrowing/affordability position renders off holding market accommodation unsuitable.

## 10.6 Re-organisation of labour

Reorganisation of labour to reduce the on-site presence requirement has been examined and found not to be a viable or proportionate alternative.

### 10.6.1 Staffing Pattern:

The rota and timesheet evidence show that all supporting staff work limited daytime hours (8 - 20 hours per week). None are contracted or trained to deliver overnight or emergency welfare cover.

### 10.6.2 Operational Risks:

The incident log evidences repeated out of hours events requiring immediate skilled response. Reliance on part time or untrained staff for such duties would expose the enterprise to unacceptable welfare, licence compliance, and reputational risk.

### 10.6.3 Financial Impact:

Recruiting and retaining additional full time staff to provide 24-hour cover would introduce recurring payroll costs inconsistent with the enterprise’s operational scale and margins.

On balance, re-organisation cannot be relied upon to deliver dependable, trained overnight and immediate emergency cover without materially increasing operating costs or materially increasing welfare risk.

## 10.7 Conclusion

Based on the verified property, occupancy, and structural evidence, this assessment finds that no existing or alternative accommodation, on or off the holding, offers a reasonable, deliverable, or proportionate solution to meet the functional and welfare driven accommodation need.

- All on-holding dwellings are occupied and not available;
- The identified eastern wing is structurally inadequate and uneconomic to convert;
- The local housing market offers no practical or affordable alternatives; and

- Labour reorganisation would compromise animal welfare and enterprise resilience.

## 11. Combined TAN 6 Test Appraisal Summary

This Rural Enterprise Dwelling Appraisal (REDA) has assessed the proposal for a modest on-site dwelling at Home & Away Kennels, Greenmoor, against the four principal TAN 6 tests: Functional, Time, Financial, and Other Dwellings.

Each test has been considered independently and on the balance of verifiable operational, financial, and regulatory evidence.

### 11.1 Function Test

The operational evidence, including staff rotas, incident logs, and licensing documentation, demonstrates a clear and continuing need for a resident full time worker who is readily available at most times to safeguard animal welfare and sustain business continuity.

The nature of the enterprise, providing continuous boarding, care, and welfare supervision, creates predictable out of hours demand, verified through documented late/early handovers, emergency veterinary responses, and recorded equipment failures.

These obligations are personal to the licence holder under the Animal Welfare (Licensing of Activities Involving Animals) (Wales) Regulations 2021, and cannot be delegated to untrained or off-site staff.

Accordingly, the functional requirement for proximate on-site accommodation is fully established and evidenced.

### 11.2 Time Test

Labour records, man-hour modelling, and bookings data confirm that the operational requirement is permanent and full time, not seasonal or intermittent. The principal operator consistently undertakes approximately 60 hours per week, providing early, late, and emergency coverage that part time staff cannot deliver.

Trading and bookings records over successive years show consistent, year round activity with growing demand, corroborated by financial accounts demonstrating stable profitability.

The business's regulatory obligations and its continuous operating model mean that the need for proximate residence is reasonably expected to persist for at least the five year appraisal horizon, satisfying the Time Test.

### 11.3 Financial Test

Historic and projected financial data establish that Home & Away Kennels is a financially viable and sustainable enterprise capable of supporting both ongoing operations and the proposed dwelling.

Turnover has increased fivefold in three years, while net margins have remained consistently strong (55- 66 %).

Forecasts indicate continued profitability, robust cash flow, and ample headroom to service the proposed £150,000 development loan with coverage ratios exceeding 3x throughout the projection period.

Stress testing confirms resilience under revenue reductions of up to 20 %, with the business remaining profitable and cash positive.

The Financial Test is therefore satisfied with clear evidence of sustainability and resilience.

### 11.4 Other Dwelling Test

An audit of all dwellings on the holding confirms that no suitable or available accommodation exists to meet the operational need.

All existing units are occupied or legally constrained, and the eastern wing identified by the Inspector as a potential conversion option is structurally substandard, undersized, and economically disproportionate to adapt for habitation.

A local market search verified that no affordable or proximate off-holding dwellings meet the functional and financial parameters of the enterprise.

Labour reorganisation is impractical given the specialist and welfare critical nature of the work.

Consequently, the proposal for a purpose built, modest on-site dwelling is the only reasonable and proportionate means of meeting the established need.