

PROCEDURE NOTICE OF RENFREWSHIRE COUNCIL LOCAL REVIEW BODY
REQUEST FOR FURTHER INFORMATION

Proposal: Erection of dwellinghouse and livestock barn (in principle).
Location: at site 500 metres south west of Undercraig Farm House, Galahill Road, Langbank
Application Type: Planning Permission
Application Number: 23/0158/PP

This Procedure Notice is given to the following:

(i) AXN Architecture
20 Middlepenny Road
Langbank
PA14 6XB

(ii) Linsay de Freitas
Undercraig Cottage
Old Greenock Road
Langbank
PA14N 6 YS

The Applicant

At a meeting on 26 March 2024, Renfrewshire Council's Local Review Body (the "LRB") determined, in terms of Regulation 12 of the Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013 (the "2013 Regulations") that the review documents before it did not provide sufficient information to enable it to determine the review of the above Planning Application.

In accordance with Regulation 13 of the 2013 Regulations the LRB determined that the review should proceed by way of further written submissions.

This Procedure Notice, which is given under and in accordance with Paragraph 15 of the 2013 Regulations, requires the appellant to provide by no later than **26 April 2024**, a written submission to the LRB detailing the business reasons, together with supporting evidence, why the proposed dwellhouse and livestock barn required to be erected at the proposed site (the "Procedure Notice Response).

Responses may be sent electronically to democratic-services@renfrewshire.gov.uk

Following receipt of the further information requested the review application will be submitted to the next meeting of the LRB. Notice which is scheduled to be held at 2pm on 4 June 2024 in the Council Chambers, Renfrewshire House, Cotton Street, Paisley.



Finance & Resources
Director: Alastair MacArthur *CPFA*
Head of Corporate Governance: Mark Conaghan LLB (Hons) Dip LP
Renfrewshire House, Cotton Street, Paisley PA1 1TT
www.renfrewshire.gov.uk



‘This Procedure Notice, which is given under and in accordance with Paragraph 15 of the 2013 Regulations, requires the appellant to provide by no later than 26 April 2024, a written submission to the LRB detailing the business reasons, together with supporting evidence, why the proposed dwellinghouse and livestock barn required to be erected at the proposed site (the “Procedure Notice Response.”

Business reasons why the dwelling house and livestock barn are required:

Item 1 - Claire Whitehead letter of support

Claire E Whitehead, is the only Recognised RCVS Specialist in Camelid Health & Production in the UK and holds Diplomat status in large animal internal medicine with the American College for Veterinary Internal Medicine.

She is the current President of the British Veterinary Camelid Society.

Claire has provided a letter of support detailing reasons why Camelid (Alpaca) owners should be in close proximity to the herd at all times.

The business needs its animals in order to offer its experiences and therefore make money. Without the animals there is no business. Animal welfare will suffer if the applicant is living elsewhere and therefore this will be detrimental to the business.

Item 2 – Previously submitted SAC Labour requirement report.

This report was updated last year and the findings were as follows:

‘Standard Labour Requirements (SLR) represent the notional amount of labour required by a holding to carry out all of its agricultural activity and is also used as a measure of farm size. Standard Labour Requirements are derived at an aggregate level for each agricultural activity. The total SLR for each farm is calculated by multiplying its crop areas and livestock numbers by the appropriate SLR coefficients and then summing the results for all agricultural activity on that farm. One SLR equates to 1,900 working hours per year.

The total SLR for Scotland was 46,700 full time equivalent workers, averaging 0.89 per holding.’ - <https://www.gov.scot/publications/economic-report-scottish-agriculture-2016/pages/43/>

See page 10 of Linsay’s Labour requirement report – ‘Based on these figures it is apparent that having a dwelling on site would be most advantageous for Linsay who undoubtedly must be working over and above the standard of 1900 hours. (Source - Farm Management Handbook 2020/21).’

And

‘Taking account of the land and stocking currently managed by the business it is calculated that the labour required will be around 1.72 labour units.

This would suggest that the business has a requirement for over one and a half full time labour units.’

This shows that there is a huge amount of work to be done for the business to run effectively. It is essential that Lindsay lives on site in order to carry out the amount of work needed to keep the business going.

Item 3 – Further reasons

Following on from the local review body meeting set on 26th of March 2024 in accordance to the specific regulations a requirement was sent to the applicant for further written submissions to be submitted detailing the business reasons, including supporting evidence, why the proposed dwelling house and livestock barn required to be erected at the proposed site.

The applicant/business has identified this site specifically for number of reasons, these include but are not limited to the specific needs of the business which includes the welfare of the livestock, the landscape, establish road network, established services and local development plan.

Please see “supporting statement of appeal against refusal notice” previously submitted for further in depth explanations.

In summary, the business has identified that the current established number of livestock are able to undertake only a specific amount of physical interaction with customers and can only be fed a certain amount of feed by visitors to remain healthy. The current herd numbers mean the business is only able to complete a limited number of treks and experiences each day. With weather conditions effecting visitor attendance it is imperative the business can operate with ample capacity when able.

It has therefore been identified the herd requires to be increased, this has further business benefits that it will allow for the increase in wool production as well as more experiences being offered. Alpacas are valuable livestock and to establish and/or purchase livestock from other producers is very expensive, it also brings risks; with gene lines hard to track, and increases the risk of herd disease. The business focused decision to produce alpacas on site to solve this issue allows for gene lines to be established and good quality livestock to continue to be produced, increasing quality of visitor experience, wool production and allowing experiences to be run more frequently.

For animal welfare, business risk, visitor safety, the breeding taking place is required to be done as far as reasonably practical from the current land parcels used to house the male alpacas. This is due to the nature of the males when around females. Males can become boisterous, can be aggressive and would pose a significant risk to the business allowing visitors to be around the males in this state.

The site identified for the proposed livestock barn and dwelling house is located in the only flat area of the farm well clear of the current trekking routes and established experience area. The site is situated close to an established road network, electricity and water supply. The area is naturally masked by existing tree lines and hedge rows. All of this making it a suitable site as there will be less aggressive groundwork required, no large land scaring to create entrance roads, as well as no need for the implementation of services. The barn will be used as a maternity unit for the females and future Cria. The barn will house equipment, refrigerated medication and medical supplies as well as other essential items fundamental to the care of pregnant females and their Cria which can include, blood products, none of which can be left unattended.

Other considerations given when assessing the site were that the site is situated near to the newly established forestry commission project comprising of new woodland and footpaths. This has seen a welcomed increase in dog walkers and people using the countryside. Although most if not all people who use this area with their dogs are likely to be responsible. The close proximity of legally protected pregnant livestock to dogs (Dogs (Protection of Livestock) (Amendment) (Scotland) Act 2021) adds risk of miscarriage and other tragic events. Other considerations included Cria welfare specifically regarding them being preyed on by fox's and other predators suggest a presence is required permanently at the operation.

Larch Green Alpacas

Labour Requirement Report

Strictly confidential



Prepared by:
SAC Consulting
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December 2022

Introduction

This report provides an assessment of the labour requirement for the business of Larch Green Alpacas. The report is based on information received by Carol-Anne Warnock, Agricultural Consultant, SAC from Linsay Mitchell (Sole Trader) at a meeting at Undercraig Farm.

Linsay would like to develop and grow the business but feels that her ambition cannot be achieved whilst still living in the farmhouse at Undercraig with her parents (John and Shona Mitchell) and sister (Laura).

Although the whole family live at Undercraig Farm only Linsay is involved in the day to day running of Larch Green Alpacas.

John Mitchell operates a heavy plant business from Undercraig Farm offering foundation and drainage works.

Shona Mitchell runs Larch Green Lodges; this business has 3 luxury self-catering lodges on farm overlooking the Clyde estuary.

Laura Mitchell works in retail off site.

Linsay proposes to build a dwelling house on land she owns at Undercraig Farm with the view to expanding the existing Alpaca and Livery business. This report will appraise whether the labour involved in the business justifies another dwelling on site.

Contents

DESCRIPTION OF BUSINESS.....	4
BUSINESS_ACTIVITIES - ALPACAS.....	5
BUSINESS_ACTIVITIES - HORSES.....	5
FINANCIAL PERFORMANCE.....	6
PROPOSED SITING OF NEW DWELLING.....	8
ANNUAL LABOUR REQUIREMENT.....	9
ADDITIONAL POINTS OF NOTE.....	11
Appendix 1 – Farm Boundary Map.....	12

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DESCRIPTION OF BUSINESS

Larch Green Alpacas was established in 2018 by Linsay Mitchell (Sole Trader). The business offers Alpaca experiences from Undercraig Farm in Renfrewshire alongside selling Alpaca fibre and more recently entering into the Breeding Alpaca market. Alongside the Alpaca enterprise the business makes use of the farm stabling to provide livery for 8 horses (2 owned).

Land

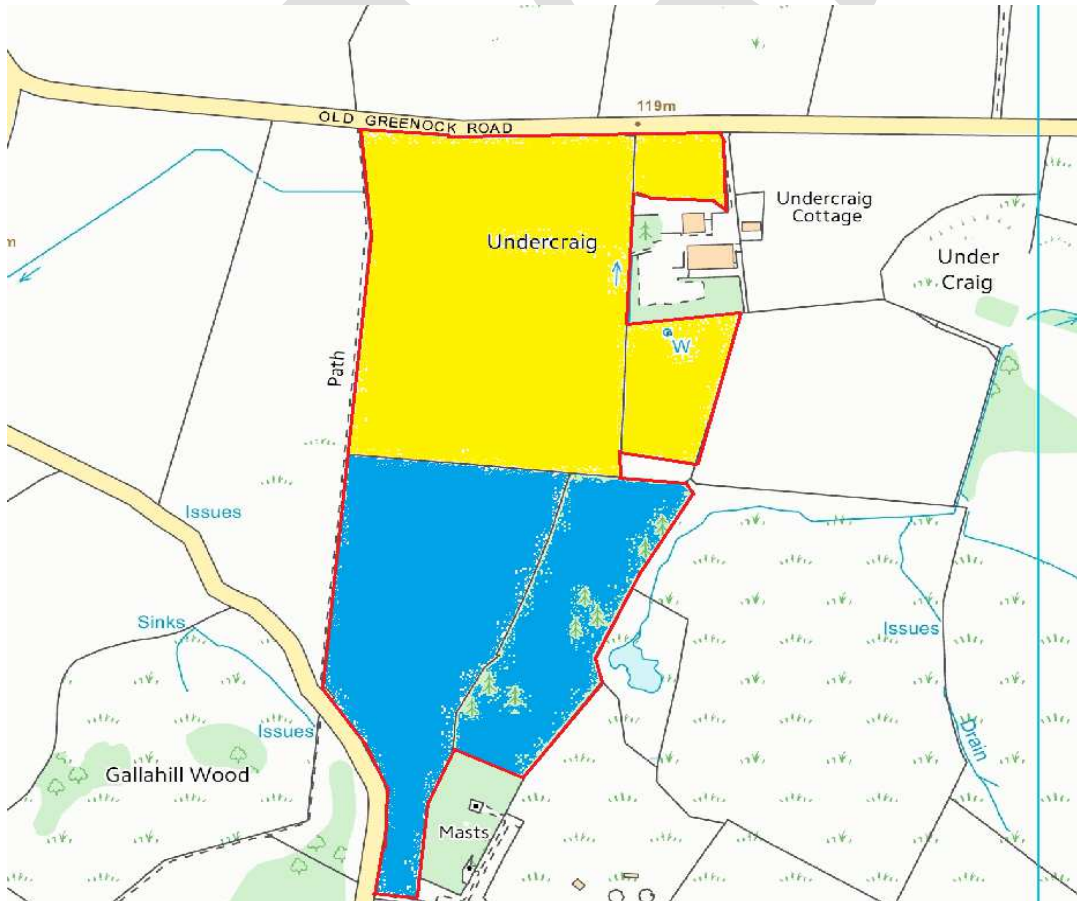
The business utilises land owned by Linsay alongside land her parents previously farmed. An agreement is also held for grazing rights over 3.97 hectares owned by the nearby Gleddoch Golf and Spa Resort. This land has not been included in any calculations as although there is a signed agreement it does not provide sufficient security of tenure.

All land is utilised for grazing with forage stocks brought in.

A full breakdown of the land can be found below:

Ownership	Area (ha)
Linsay Mitchell	8.37
John & Shona Mitchell (Parents)	8.87
Total Land Owned*	17.24
Total Land Utilised	13.66

*Of the land Owned 3.58ha is Coniferous woodland with no grazeable understorey and does not contribute to the business.



BUSINESS ACTIVITIES – ALPACAS

The business has 7 male alpacas and offers Alpaca experiences.

These comprise trekking packages, alpaca meeting and feeding sessions on farm together with packages offering visitation to nursery schools, care homes and special events.

The on-farm experiences are offered from Thursday through to Monday with Tuesday and Wednesday set-aside for Alpaca care and maintenance activities such as feet trimming, teeth grinding and paddock cleaning.

A trek usually comprises 7 people (one for each alpaca) and lasts around 1 hour, with mini treks (40 mins) also available for children. Between the treks and the feeding experiences the business can expect to see between 15–20 people on site on each of their experience days.

The Alpacas are summered outside on grass with access to an open fronted shelter. In winter should conditions deteriorate the alpacas can be housed within the steading although this has not been required in the last couple of years.

Fleeces from the Alpacas are processed into 100g balls of high quality, high value product for sale to visitors to the farm or local spinners/crafters. Approximately 16.75 kgs of Alpaca Fleece produces approximately 129 balls of wool for sale annually.

Three breeding female Alpacas were introduced into the herd in 2022. They are all pregnant and baby cria are expected in the Summer of 2023. This will undoubtedly be an added attraction for visitors to the farm. Additionally, this will increase the earning potential of the business by allowing the business to trade in breeding animals. Breeding animals can sell from between £250 – £15,000. Prices vary according to genetics, age, fertility, colour and fleece fibre quality.

BUSINESS ACTIVITIES – HORSES

There are 8 stable blocks at Undercraig with all stables currently in use.

There are 6 horses on full livery with the remaining 2 stables occupied by Linsay's own horses.

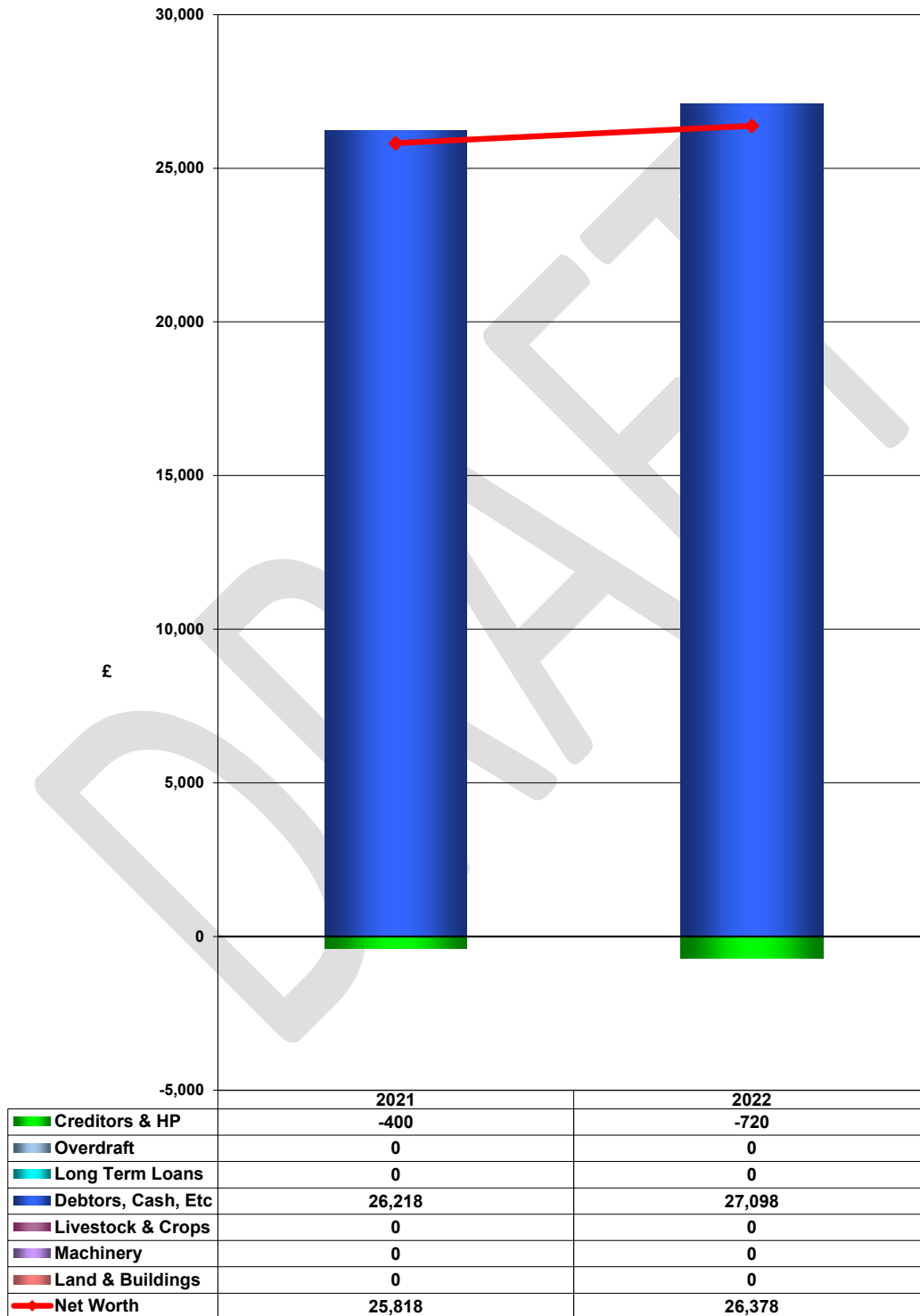
A horse arena is available on site where livery clients can school their horses.

A further barn stores the businesses equipment comprising tractor, grass topper, harrows, roller and loadall. Horse shavings and purchased forage stocks are also stored in this barn.

FINANCIAL PERFORMANCE

A financial appraisal was completed on the most recent financial accounts for the business (Year-end 31st March 2021 and 2022). This found the business to be in sound financial health with a strong balance sheet.

Balance Sheet Trends



The business is fortunate to have no overdraft or borrowing and cash in the bank.

Owner equity was between 97 and 98% in the three years analysed which is well above the “safe” threshold of 70% for an owner-occupied business.

A profit was recorded in each of the years analysed.

Example Farm

Profit & Loss Summary

	£		
Year ended	2021	2022	2 Yr Ave.
Gross Output	53,380	65,208	59,294
Variable Costs	12,660	16,495	14,578
Gross Margin	40,720	48,713	44,717
Employed Labour	0	0	0
Power & Machinery Expenses	3,848	1,546	2,697
Property & General Overheads	4,420	4,708	4,564
Total Fixed Costs	8,268	6,254	7,261
Gross Profit	32,452	42,459	37,456
Finance & Rent	1,800	1,899	1,850
Net Profit	30,652	40,560	35,606

PROPOSED SITING OF NEW DWELLING

Linsay proposes to build a dwelling on her own land within walking distance of the stables and alpaca paddock. This will allow her to move out of the family home and become more independent from her parents. Although there is a cottage at Undercraig Farm, this is owned and occupied by a long-term resident and, it is not expected to come on the market in the near future. Similarly, Linsay's parents are unlikely to move from the family home as they require to be close to their own businesses which also operate from the site.

No other housing in the vicinity has been identified as available and suitable.

The building location will not impact on any areas of high environmental or conservation value. There are no known environmental designations on the unit.



Proposed site marked with a star

ANNUAL LABOUR REQUIREMENT

Calculation of Standard Hours worked.

Labour Requirement – Larch Green Alpacas			
Crops	Area (Ha)	Hours/Annum/Ha	Total Hours
Permanent Pasture*	13.66	3.1	42.34
		Sub Total	42.34

* No time has been allocated to produce forage as all hay/haylage is brought in

Livestock	Number	Hours/Annum/Animal	Total Hours
Horses (full livery)	6	660	3960
Horses (own – grass livery)	2	240	480
		Economies of scale reduction 30%	
		Sub Total	3108

** It is recognised that it does not necessarily take double the amount of time to care for two horses as it does for one. Therefore, economies of scale are applied to the labour requirements

*** Figures for horses have been taken from the Equine Business Guide, ABC, 6th Edition, 2015 to recognise the diversified nature of the business.

Livestock	Number	Hours/Annum/Animal	Total Hours
Alpacas (Males)	7	12	84
Alpacas (Breeding Females)	3	12	36
		Sub Total	120

**** There are no nationally agreed standards for an Alpaca enterprise. Neither SAC nor SGRPID have produced figures that represent 'typical' labour requirements for alpacas. The figure used above is the standard for goats which was determined to be the closest equivalent.

		TOTAL	3270.34
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Standard Man Year (hrs); One Full-time Equivalent. Based on the UK Agricultural Wages Board 39 hour week.	1,900
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Source: Farm Management Handbook 2020/21. These figures relate to those published in a report of the UK Farm Classification Document (October 2014) and recommends that 1900 hours of labour are equivalent to one standard annual labour unit.

Labour Requirement	1.72
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The table above shows the calculated annual labour requirement for this business at Larch Green Alpacas. This is based on current stocking and cropping levels.

Taking account of the land and stocking currently managed by the business it is calculated that the labour required will be around **1.72** labour units.

This would suggest that the business has a requirement for over one and a half full time labour units.

Most figures used in this report are taken from the Farm Management Handbook 2020/21 and do not necessarily reflect the diversified nature of the Alpaca enterprises. The additional activities offered and the public facing nature of the business will undoubtedly support a higher labour requirement than is indicated above.

An Alpaca trek alone lasts around 1 hour, with grooming, feeding, mucking and fitting a head collar being additional. The figures used in the table above do not reflect the additional labour requirement for the trekking aspect of the business.

Additionally, as there are no nationally agreed standards for an Alpaca enterprise the standard for goats has been used instead. This will not entirely be reflective of the workload involved in caring for Alpacas particularly breeding females.

Based on these figures it is apparent that having a dwelling on site would be most advantageous for Linsay who undoubtedly must be working over and above the standard of 1900 hours. (Source – Farm Management Handbook 2020/21).

ADDITIONAL POINTS OF NOTE

Animal Health and Welfare

It can be deemed necessary that a trained and experienced person is always on site to cater for stock management as well as animal health and welfare issues. Alpacas are herd animals and crucially are reluctant to show any signs of ill health. Once they appear unwell, they are often in a much poorer condition than they would be if they had shown earlier signs of illness. It is therefore essential to closely observe them to spot anything unusual regarding their behaviour, feeding, movement etc.

Although the rest of the family live on farm they are kept occupied with their own businesses and will not be familiar with the normal behaviour patterns of the alpacas so will be less equipped to identify signs of an animal in poor health.

A full-time presence on site is more important with breeding livestock as supervision is often needed during the later stages of pregnancy and labour (Unpacking). Newborn cria may need assistance in standing and suckling or require to be housed with their dam for shelter. In exceptional cases a dam may fail to bond with their offspring necessitating bottle feeding. This must be done every 1-2 hours initially and further supports the requirement to always have a stocksperson on site.

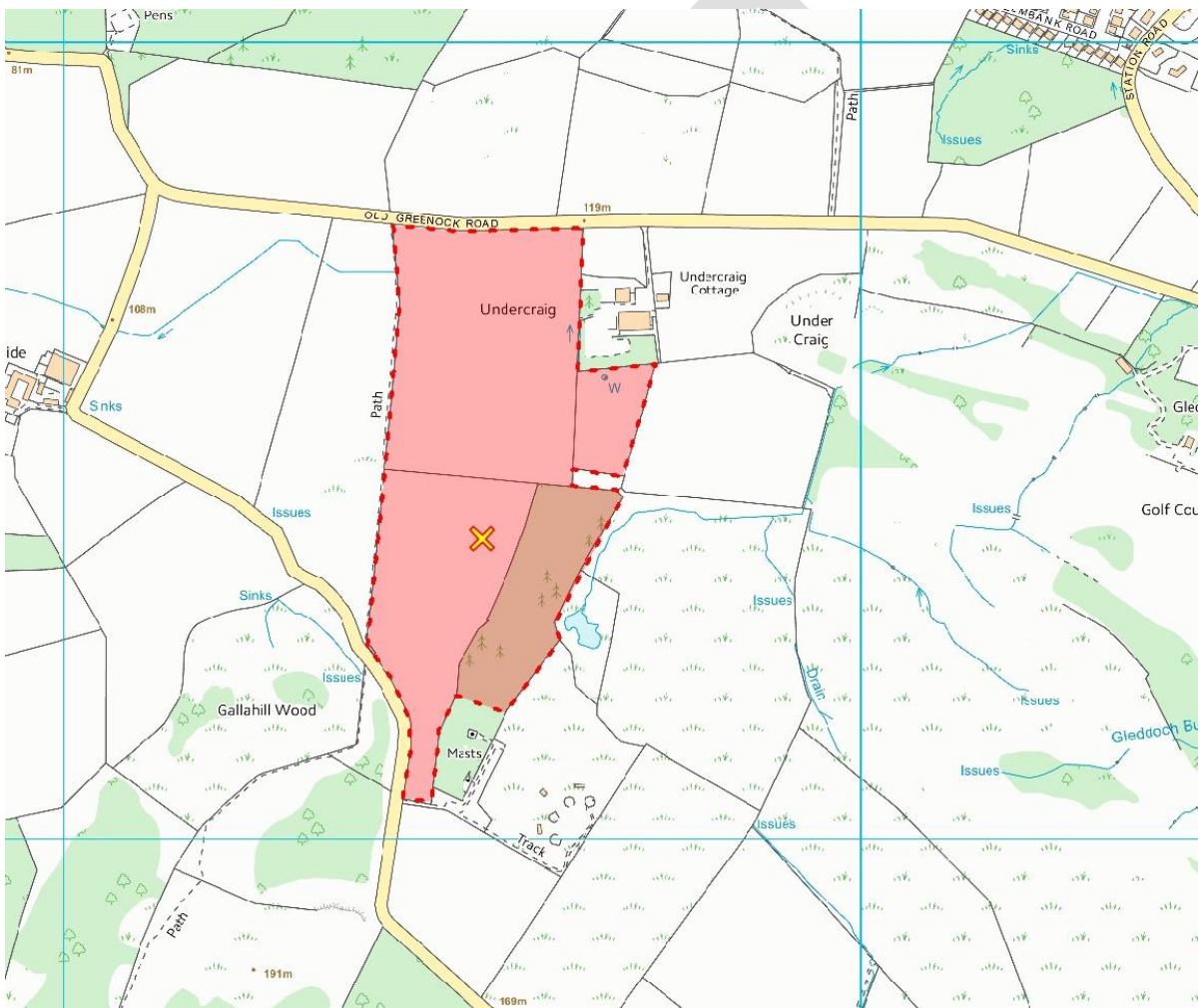
Security, Safety and Environmental Protection

Theft in rural communities is on the rise, due to the high valuation of stock and equipment on farm it is desirable that someone is always around the premises.

A recent police incident (Police incident Numbers PS-202109204-3249 and PS-20210913-0966) recorded on farm saw a stolen car torched next to coniferous woodland. This incident caused a large amount of stress for the neighbouring grazing horses and could have resulted in animals harming themselves in their efforts to escape. The area is also subject to fly tipping and illegal dumping.

The site of the proposed dwelling is in the same area, and it is hoped a presence here will deter such criminal activity.

APPENDIX 1 – Farm Boundary Map





**THE ALPACA
VET**
*Providing Peace
of Mind*

Claire E Whitehead BVM&S MS FHEA MRCVS
Diplomate ACVIM (Large Animal)
RCVS Specialist in Camelid Health & Production
The Old Barracks, Lady Grove, Goring Heath, Reading,
RG8 7RU, UK

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www.ukalpacavet.com

9th April 2024

Planning Department
Renfrewshire house
Cotton Street
Paisley
PA1 1WB

Ref.: Appeal by Mrs L de Freitas, Larch Green Alpacas
Site at Undercraig Farm, Old Greenock Road, Lanbank, Renfrewshire
Reference: Application No: 23/0158/PP

Dear Sir,

I am writing to you in support of Mrs de Freitas' planning application to build a dwelling on the site of their alpaca farm at Undercraig Farm. As such, it may be appropriate for me to introduce myself and present my relevant expertise on this matter. I graduated as a vet in 1999 and worked in practice for a few years before moving to the United States to undertake a 3 year residency in Large Animal Internal Medicine at The Ohio State University. The hospital's farm animal caseload was 3500 cases annually, of which 1500 were alpacas or llamas. I am board certified with the American College of Veterinary Internal Medicine (Large Animal specialty) and hold a Masters degree in Veterinary Clinical Sciences – my thesis was on Vitamin D metabolism and prevention of rickets in neonatal alpacas. Since returning from the US in 2006, I spent 4 years running the Farm Animal and Camelid Clinical Services at The Royal Veterinary College and since then, moved into private practice, setting up my own service working exclusively with alpacas and llamas and teaching owners and vets how to best care for their animals. I am the current President of the British Veterinary Camelid Society.

Although I am not the regular veterinary provider for Larch Green Alpacas, I conducted an interview with Mrs de Freitas where I was able to view the farm by live video consult and ask about her herd management. I am convinced that Mrs de Freitas is dedicated to the care of her animals and that her efforts to establish herself on her farm are genuine. I understand that she and her growing young family are currently living in her parents' home and wish to build an additional dwelling onsite in order properly manage the alpaca herd, and that continuing to live all in one dwelling isn't sustainable.

Larch Green Alpacas have 12 alpacas currently, including 7 boys used for a trekking business, 3 adult females, and two crias born in 2023. They intend to continue breeding the girls in order to support the trekking business.

Camelid Veterinary Services Ltd (trading as The Alpaca Vet)

Company number: 08682659

It is my understanding that planning consent has been denied on the grounds that “the business owner already resides at the site and a site-specific operational need for the dwelling has not been demonstrated”, or that it is not necessary for the keeper of the alpacas to live on site. Clearly, the house that is there currently is of a restricted size and is not able to continue to accommodate the existing residents with a growing family and who all need to live on site to serve their businesses. I intend to address the site-specific operational need for Mrs de Freitas to be living on site.

- While general alpaca husbandry can be carried out during the day, it is rather the unforeseen issues that require round-the-clock care and management. Alpacas are susceptible to many conditions that may result in disease at any time of year: it is important for those keeping alpacas to check on their animals regularly to observe any potentially subtle signs of illness. As a “prey” species, alpacas are exceptionally adept at masking clinical signs of illness in order to avoid predation. Careful observation of alpacas can provide good clues that an animal is sick – for example an alpaca may separate itself off from the rest of the herd and stop eating, it may seem uncomfortable by sitting with its legs out to the side and shifting position, and it may simply exhibit nostril flare, a clinical sign consistent with increased respiratory rate and stress due to pain, discomfort or increased body temperature. All these are subtle clues that may be picked up by an owner who is present onsite and able to supervise their animals closely and regularly during the day and evening hours but may be dismissed at a single observation. It is not uncommon for animals to progress from exhibiting no clinical signs to being found “suddenly dead” within a 24 hour period: restricting observation to short periods only increases the chance of this occurring. In this, I would argue the same for any species of farm animal. Although economical considerations often result in other farm animals being kept at locations away from a farmer’s residence, this is far from an optimal situation in terms of the animals’ welfare and not a reason to justify or perpetuate similarly limited or poor supervision for others. It is not uncommon for any of these species to be found dead, or with disease so far progressed that veterinary attention at that time may be too late. On the grounds of animal welfare, it is my opinion that we should be encouraging closer supervision of farmed animals including alpacas such that unnecessary suffering may be avoided. Living on site facilitates this better welfare.
- In addition to the need to observe alpacas for signs of abnormal behaviour and disease, when alpacas are sick, they may require regular checks and provision of care and treatments. This need does not occur only within working hours and treatments may be required throughout the day and night – at *any* time of year. In the winter time, it is especially critical since patients will require additional care due to loss of body heat: their coats do not have the protective natural oils that sheep possess so they are susceptible to wet/windy/cold weather conditions, especially when under the stress of disease. Living anywhere other than on-site will make 24/7 treatments exceptionally difficult and is almost certain to result in compromised animal welfare.
- Alpacas are often a lot more sick on paper (ie on labwork) than they appear clinically, and they typically respond better to more intensive medical therapy such as intravenous fluids and antibiotics. This is relevant to both crias and adult animals. Fluid therapy can be managed on-farm with relative ease and alpaca owners can be trained to manage IV catheters quite successfully, making intensive management fairly cost-effective: this sort of management may require IV fluid boluses to be administered at 2-4 hourly intervals throughout the night. Without having the facility to live on-site, this sort of management would be extremely difficult to achieve.
- In terms of breeding alpacas, unlike most other farm species, it is not possible to accurately predict a birthing date as alpacas have extremely variable gestation lengths, potentially from around 330 days to over 370 days, meaning that extended observation is required. While it is true that *most* birthings will take place between dawn and some time in the afternoon, it is those that do not occur during these hours that are likely to be having problems and ignoring this possibility compromises animal welfare. A study I performed during the birthing season of 2017 and including 494 births showed that the proportion of births requiring assistance increased where

birthing occurred between 4pm and 8pm and increased further for births occurring after 8pm with 80% of these births requiring assistance.

- In my 2017 study, the incidence of an assisted birth was approximately 13% of the total number of births. Difficult birthings tend to be due to malpresentation of the foetus rather than oversized crias, especially because of their long necks and legs – for example, the neck may be back and only the front feet presenting. Agricultural Consultants tend to compare keeping alpacas with keeping sheep and cattle. This comparison is not valid in consideration of birthings: a more useful comparison would be had in comparing alpaca birthing with foaling. Birthing in horses is very *unlike* calving or lambing and horse breeders would be horrified about the possibility of having an unobserved birthing. Like horses, alpacas normally have a short period of active delivery and if active labour does not progress to delivery of the cria within 20-30 mins, urgent examination of the alpaca is necessary as malpresentation may need to be corrected. Any delay in identifying this and seeking veterinary attention if required may have fatal consequences for both cria and dam. Tibary *et al* comment that there are 3 major differences between camelids and ruminants that should be considered in dealing with a difficult birthing (In: Llama & Alpaca Care; Elsevier, First Edition, 2014):
 - i. The pelvic inlet is narrower
 - ii. The cervix and vagina are more prone to laceration and severe inflammation often leading to adhesions [scar tissue forms across the cervix or vaginal wall resulting in a female being unable to breed subsequently – these are *not* normally correctable]
 - iii. The risk for neonatal hypoxia and death are increased by forceful uterine and abdominal contractions and rapid detachment of the placenta.

The consequences of these important differences are that early recognition of dystocia (difficult birthing) is paramount, any decision to interfere and manipulate a mal-presented foetus should be made rapidly and that supportive care should be provided to the dam and foetus before and during any manipulation. Clearly therefore, the need to live on-site to identify and deal with any potential emergencies is critical to an alpaca breeder who not only wishes to ensure the safe birth of any new cria but also wants to maintain the breeding potential of his/her females.

- Newborn crias are extremely vulnerable if born in inclement weather, and it is extremely important for them to acquire adequate colostrum in the first 12-24 hours to protect them from bugs that they are exposed to in their environment. Mortality rates of crias in South America varied from 9-57% over a 7 year study on several different farms, depending on conditions (Ramirez et al, *Res III Reunion Assoc Per Prod Anim*, 1980). In South America, farming conditions are far more extensive and observation of birthing and crias is far less rigorous than can be achieved under UK farming conditions. In fact, a study in the UK in the mid-90s, in the early days of alpaca breeding in the UK, showed that 17-33% of alpaca deaths occurred in alpacas that were aged less than 6 months and that 86% of those occurred during the first week of life (Davis et al, *Vet Record*, 1998). This emphasises the importance of good observation in the first week of life: we know a lot more now than we did in the 90s about caring for neonatal alpacas. If the cria is having trouble getting going, the owner needs to be on-site to facilitate nursing and/or provide supplementary care including the possibility of having the vet administer a plasma transfusion to correct any failure to ingest sufficient colostrum. Camelid neonates are a little more like foals in this regard (calves tend to be more robust) and the care of camelid neonates is thus more comparable to the care of foals.
- It is not uncommon for crias to require bottle-feeding if their dams have insufficient milk or have died and this bottle feeding needs to continue until the crias reach their weaning age of 6 months. During the first month of their lives, feeds need to be given every 2 hours: after this they can be gradually reduced in frequency, but they should still be receiving feeds last thing at night (at least 10pm, preferably midnight) and first thing in the morning (6-7am) until weaning. Feeding too

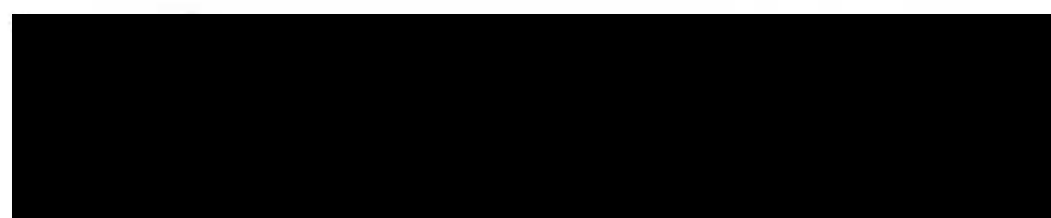
Camelid Veterinary Services Ltd (trading as The Alpaca Vet)

much at a single feed can result in backflow of milk into the first stomach compartment causing C1 acidosis and colic and this can be life-threatening: in this way, alpaca crias are different from calves in which larger volume feeds are possible due to their different gastrointestinal anatomy.

Larch Green Alpacas have 42 acres of land: they are currently using only 4.5 acres for the alpacas. On good quality grazing, I typically advise people that they can stock up to 5 alpacas per acre. They currently have 12 alpacas (comprising 7 males, 3 breeding females, and 2 weanlings) which gives them a stocking density of less than 0.5 alpacas per acre on what they are currently using. They plan to increase the herd size and have plenty of space to do this. I will typically advise alpaca owners to ensure that they always have spare grazing available for alpacas such that some pasture is always being rested to allow for parasite control and growth of pasture. These numbers allow for this to happen.

In conclusion, I earnestly support the desire of the de Freitas family to live onsite in order to properly care for their alpacas and would urge you to seriously consider that the welfare of the animals is better served in this manner. It is my opinion that not being able to live on-site would compromise animal welfare.

Yours sincerely,

A solid black rectangular box redacting the signature of Claire E Whitehead.

Claire E Whitehead BVM&S MS FHEA MRCVS
Diplomate ACVIM (Large Animal)

President, British Veterinary Camelid Society