

Oak Tree Fishery

Business Plan & Planning Statement 2016/2017



July 2016

This document has been prepared to assist the accompanying planning application, giving a detailed insight into the planning history, past activities undertaken at the site and future intentions of the business. It can also be used as a design and access statement for the operational development parts of the submission. The document also focuses on the planning issues concerned with the proposal including functional need to be on site and the financial circumstances of the current business, looking towards future projections.

This document has been jointly prepared by the owner and Managing Director of Oak Tree Fishery Ltd Mr Andrew Barlow and Mr Gareth Stent who is a Chartered Town Planner and member of the Royal Town Planning Institute.

Mr Barlow and his wife own and run the fishery and have a substantial knowledge of the site and are responsible for its success and the welfare of the customers using the site.

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1.0 Introduction

1.1 General Information

- 1.1.1 Oak Tree Fishery is a mixed coarse fishery located just off the A161 at Graizelound, North Lincolnshire. The main lake was excavated in 2006-2007 and formed by a stepping of the lake with under water ledges running around the lake to provide attractive fish-catching features. A second snake shaped lake was added in 2013. The site is accessed from the A161 just south of Graizelound and is reached by a small access track which leads to the gated site. In addition to the lakes the site currently hosts a temporary store cabin, a separate brick built toilet facility, a parking area for up to 5 caravans and a field used for caravan rallies. The site has been recently connected to electricity and has a borehole for additional water.
- 1.1.2 The business commenced trading on 1st April 2008 and its primary aim is to provide an excellent leisure facility for use by local people and visitors to the area. The site covers a total of seven acres and now has two coarse fishing lakes (main lake and a snake lake) that cater for up to forty four anglers. These include four specially adapted platforms for disabled anglers. Income is mainly derived from day tickets, club and open match bookings.
- 1.1.3 The facility is well supported by local people including cub and scout groups and local angling clubs. A limited range of refreshments and fishing baits are also sold on site and provide a small amount of additional income.
- 1.1.4 The other main income stream is from touring caravans and the site was registered from August 2008 as a Certified Location (CL) with the Caravan Club. A Rally Field has recently been created and this can hold up to 35 units for licensed caravan rallies and is currently operational.
- 1.1.5 The land around the lake is grassed, the water quality in the lake is known to be good and the fishery has matured through the careful actions of its owner since its first creation.
- 1.1.6 The lakes are stocked with a variety of coarse fish species including bream, common and mirror carp, F1 carp hybrids, tench, chubb, roach, rudd, ide and barbel. A daily fishing ticket costs £6 and the venue is used for various competitions. All fish are returned live to the water after capture. The lake is becoming increasingly popular with visiting pleasure and match anglers.

1.2 **The Proposal**

- 1.2.1 The site owner is looking to develop the business and make it more profitable to ensure its long term sustainability. The plan is also to increase the range of facilities and amenities on site to yet further increase its popularity as a leisure attraction. To successfully grow the business, provision is required for onsite managers accommodation, a cafe, a hatchery and stock ponds.
- 1.2.2 The proposal is therefore to site a residential mobile home for a period of 3 years on the site. The mobile home measures 19.66m x 6.52m and is transportable log styled mobile home that falls within the definition of a caravan. It is to be sited adjacent to the car park overlooking the lake. The mobile home is from the Norwegian Log Range and known as the Mendip, details of which are shown in appendix 1.
- 1.2.3 The second element of the permission is to replace the current porta-cabin that is used as a temporary store with a further temporary structure as detailed in appendix 2 for use as an office and cafe. This timber clad temporary structure, measures 9.5 x4m and will be positioned alongside the current toilet block.
- 1.2.4 The third element of the proposal is to develop an onsite hatchery. The hatchery will be positioned in the northern corner of the site and be contained within a poly tunnel measuring 4m x 10m x 2.4 high. The hatchery will be fed by water from the bore hole and contain a growing tank and x2 breeding tanks. These will be controlled by electricity, feeding pumps and aeration equipment. Details of the hatchery are shown on the detailed drawings and within appendix 3. The fish rearing unit is essential to the success of the business and will enable the owner to become self-sufficient for his future fish requirements, thereby avoiding the necessity to purchase fish from external sources and to risk incurring the bio security problems this entails.
- 1.2.5 The final element of the proposal is to create two stock ponds in the south eastern corner of the site. Both will be shallow 1m deep ponds measure 12 x4m and 15 x 4m. Both will be netted to prevent the incursion of feeding birds. These will host the larger fish when transferred from the hatchery.
- 1.2.6 The next section provides a summary of how the business has developed to date and highlights the key issues and future investment options.

2.0 Planning History, Business Development And Investment To Date

2.1.1 The site for the fishery was purchased in 2006 and comprised of 5 acres of land situated off Station Road, Graizelound, near Haxey, North Lincs. The land was a flat open field, which was excavated for use as a fishing lake with all material kept on site for the landscaping and raising of the site levels.

2006

Planning Consent granted for 26 peg main lake.

Main lake excavated and initial fish stocking completed. PA/2006/1024

PA/2006/1024 Create Fishing Lake and associated car parking and access.

2007

Site landscaping work completed and further stocking carried out.

Portable toilet facility installed.

2008

Town's Main water supply installed. Oak Tree Fishery Ltd commenced trading.

Main fishing lake opened. Certified Location (CL) status obtained with Caravan Club (Max 5 vans per night).

2010

PA/2010/0185 - Planning permission to erect a new visitor pavilion with an attached single storey dwelling. Refused 13/7.10

2011

Water Bore Hole sunk to provide top up supplies for fishery.

2012

PA/2012/0271 Planning Consent granted for second "Snake" style lake 12 pegs to the west of the main lake.

2012

Additional 2 acres of land purchased to the west of the site.

2013

PA/2013/1277 - Planning permission to construct a fishing pond on land to the west of the main fishery. Granted 2.12.2013. This was essentially a redraw of the previously approved snake lake (PA/2012/0271) snake lake as the

applicant was able to purchase more land and hence extend the lake to an 18 peg lake. This was excavated and initial fish stocking carried out.

2014 - 15

PA/2014/1009 Planning permission to erect a building to provide toilet facilities and storage. Granted 29.10.2014.

2015

The temporary pre-fab toilets were demolished and works complete for the new toilet block. Further fish stocking completed on Snake Lake. Access and landscaping completed. Snake Lake opened late summer for pleasure fishing only. Now fully open in summer 2016. Land to the west of the site levelled and grassed. Now fully available as a caravan rally field.

2016

Mains electricity installed on site. Caravan hook up`s provided to the five Certified Location pitches.

2.2 Table 1 - Investment To Date

| | |
|-----------------------------------|-----------------|
| Purchase 5 Acres of Land | £16,000 |
| Excavate Main Lake | £28,000 |
| Initial Fish Stocking | £ 9,000 |
| Site Access & Landscaping | £ 6,000 |
| Tools & Equipment | £ 5,000 |
| Fish Restocking | £10,000 |
| Borehole | £12,000 |
| Purchase Additional 2 Acres | £19,000 |
| Excavate Second Lake | £18,000 |
| Fish Stocking Second Lake | £ 4,000 |
| Access & Landscaping | £ 4,000 |
| Construct Brick Toilet Block | £18,000 |
| Installation of mains electricity | £29,000 |
| Total | £178,000 |

3.0 Financial Performance

- 3.1.1 From Table 1 above it can be seen that a significant investment has been made in the business. The owners have not done this to provide a free service to the community as they wish to make a profit on their considerable investment and run a successful rural business. The applicants accepted in the first instance that an immediate high end return would not be achievable but rather the business would grow over time and profitability would increase.
- 3.1.2 However the revenue to date has been fairly static since the business commenced trading in 2008. The associated costs have increased significantly and have impacted on the profitability of the business as can be seen in the table below. A major fish kill occurred in 2015 due to low oxygen levels and this has adversely impacted on the revenue for that year. Coarse fish are purchased from recognised fish breeders and suppliers and are a significant cost to the business. Cormorant predation is also a problem especially during the winter months.
- 3.1.3 Caravan revenue has showed some growth but occupancy rates overall remain low. This is attributed to lack of mains electricity (now recently installed) and concerns over security with not having a permanent site presence.
- 3.1.4 Table 2 shows the actual income from 2009 onwards. The business has been profitable in most years albeit only generating a small net profit. The significant capital start up costs have been offset against the gross profit. The recent investment in the second lake, rally field and provision of mains electricity will provide a significant boost to the revenue from 2016 onwards. But clearly the financial performance needs to improve and additional income streams have now been identified.

3.2 Table 2 - Actual Income 2009 to 2016

| Year | Fishing | Caravans | Gross Profit |
|---------|---------|----------|--------------|
| 2009/10 | £ 9,200 | £ 700 | £ 9,900 |
| 2010/11 | £ 9,900 | £ 750 | £10,650 |
| 2011/12 | £10,900 | £ 900 | £11,900 |
| 2012/13 | £11,100 | £ 800 | £12,000 |
| 2013/14 | £12,100 | £1,100 | £13,200 |
| 2014/15 | £12,300 | £1,200 | £13,500 |
| 2015/16 | £11,400 | £1,700 | £13,100 |

4.0 Staffing and Operating Hours

4.1.1 Currently the business is operated by three people. One full time Manager and two part time bailiffs. From March to November the lake opens daily from 07:30 until dusk and night fishing is not currently permitted. Day tickets are issued on the bank. From December to February the fishery currently only opens at weekends. Caravans and fishing matches must be booked in advance. Due to the owners not living on site it require several car journeys throughout the day to collect monies and issue day tickets. For this reason it is not cost effective to open the fishery during weekdays in the winter due to low visitor numbers. This would however change if a temporary on site residence was available and opening days would increase along with profits.

5.0 Key issues facing the business and the essential need for a full time on site manager.

5.1 Fish Welfare and Husbandry

5.1.1 Anglers expectations are that they can catch fish easily and for those fish to be in good condition. To achieve this, the lakes must have a reasonably high fish stock density and this must be carefully managed. The welfare of the fish

is paramount. In addition to feeding the fish, the lake water quality must be carefully monitored and any problems resolved quickly.

- 5.1.2 Oxygen levels can suddenly drop due to a combination of factors which include the algae in the pond. The free floating nature of the algae provides blooms when temperatures permit providing oxygen to the pond, however they are susceptible to changing environmental conditions like water temperatures (often associated with thunder storms). After dark, algae respire utilising oxygen and releasing carbon dioxide. Dissolved oxygen levels vary and the highest concentration levels are during the mid afternoon and the lowest concentrations are at dawn, demonstrated by fish coming to the surface and skimming the surface. Once algae dies it can decompose on the fishery bed, which further strip the lake of oxygen from the water. Under these conditions fish can rapidly die from asphyxiation. Monitoring allows the deployment of oxygenating/water circulating equipment to ensure fish survive.
- 5.1.3 The business found this out to its cost in August 2015, where very low oxygen levels occurred overnight and this resulted in the loss of over 75% of the carp stock. This has had a severe impact on the business revenue in 2015 and the business had to restock the main lake at a cost of around £10k. The site owner accepts that the loss of some fish is part and parcel of running such a business, however not to this degree and expense. Mass mortalities significantly affect the fish stock and are an immediate loss to the business. Restocking can only take place if the stock is available and if the business can afford to restock. In doing so the risk of importing infections is increased. Also if this occurs in the fish stocking season (October-March) then this may be possible, however in summer months some suppliers tend to hold their stock to maximise growth and weight in their ownership to allow a greater sale value. The inability to restock would cause a loss of reputation for the business and take years to overcome. Such work would have to include publicity, free events etc. This may entirely jeopardise the business.
- 5.1.4 Regular routine water quality checks have now been established and the frequency is based on need. The frequency will vary according to the seasons, however this can only occur when the owner is on site. During the summer months and especially during hot weather conditions then it is normal to monitor the water quality up to 5 times per day. Checks are now carried out twice before dawn, twice during the day and once around dusk. If results identify any parameters below agreed thresholds then additional checks are undertaken.
- 5.1.5 The installation of remote monitoring equipment to measure dissolved oxygen levels has been considered. However the sensors are expensive and notoriously difficult to keep calibrated and as several would be required the

cost would be prohibitive. Also there are many other water quality parameters that may change and whilst dissolved oxygen levels are the most critical then others such as ammonia concentrations are also important. Currently there is no remote monitoring equipment available for ammonia. Therefore it can be concluded that trained human monitoring is more efficient and accurate. This supports the need for the manager to be on site to regularly check such levels and to resolve issues if the power goes off, or if the aerators malfunction.

5.1.6 Both lakes at Oak Tree are reasonably well balanced but the main lake in particular suffers from algal blooms during the warmer months. Consequently aeration equipment has been fitted to both lakes. This needs to be deployed at short notice when routine checks identify falling or low dissolved oxygen levels.

5.1.7 With the proposed development of the on-site fish farm (hatchery and stock ponds) then the need for a permanent site presence becomes even more important. As with all forms of husbandry the on-site presence allows quick responses to various problems that may occur. In addition to water quality issues other problems may occur such as blockage of overflow pipes and inflow pipes, ice formation etc. These can then be dealt with as fast as possible in order to minimise the impact on fish welfare.

5.2 Fish Losses Due to Predation

5.2.1 Cormorant predation is a big problem particularly during the winter months. The birds move inland from their traditional coastal feeding areas and find rich pickings in well stocked coarse fisheries such as Oak Tree. It is estimated that up to 10% of the fish stock can be lost due to cormorant predation. A range of deterrents have been employed including bird scarers and the provision of fish refuge areas. However the best deterrent is having a human presence on site.

5.3 Security

5.3.1 Theft of fish is becoming an increasing problem. Large carp and tench are worth a significant amount of money. Fish cost around £13-14 per kg and this increases if a certain species is in demand. Specimen sized carp at £10 kg can cost around £600 and this increases with size. The problem cannot be solved by merely preventing trespass as would be the case with other types of business. The easiest way to catch and take fish is by rod and line. Therefore someone could enter the site as a legitimate customer and purchase a day ticket. When caught the fish could be hidden in a bait bucket and then removed from the fishery. This is quite difficult to detect especially at night.

- 5.3.2 In recent years there has been an increase in large scale systematic poaching of carp. Organised gangs have also been known to target smaller well stocked lakes where they can be netted removing large quantities of fish that are then sold on the black market. Such thefts can be completed in a few hours after dark and also pose a bio security risk from unclean nets. These fish would be almost irreplaceable and again cause a serious impact on the lakes stock and over reputation. An onsite presence acts as a strong deterrent to this type of poaching.
- 5.3.3 Burglary and theft of equipment is also a concern. As more investment is put into the fishery, i.e. pumps, aeration equipment, fish stocks as increase the risk of theft. Caravans have been broken into and items stolen. On one occasion a caravan was stolen and later recovered some distance from the fishery. CCTV is currently being installed to oversee the key areas. However it is only by having an on-site presence that a rapid response could be provided when required.
- 5.3.4 Loss of caravan trade due to security concerns is clearly an issue but is difficult to quantify. By having a manager living on site it would greatly alleviate these concerns and boost trade accordingly.
- 5.3.5 The risks also include minor vandalism, theft of equipment, arson damage to property, water birds, tree shrubs etc

5.4 Biosecurity

- 5.4.1 The main requirement for a creating a fish breeding facility on site stems from the need for bio security. Importing fish stocks from other waters carries the risk of introducing diseases to the existing healthy fish stock. Approved fish breeders have to regularly have their fish tested for disease but re-stocking operations from external sources are still deemed to be quite risky. The costs to the business of restocking after an outbreak of disease are significant.
- 5.4.2 The solution is to breed and grow your own fish on site. However with this comes the need for even more stringent monitoring of fish and water quality. The introduction of a fish breeding is considered an essential part of the development of the business. This forms part of the risk management strategy to secure the sustainability and long term viability of the business.
- 5.4.3 Anglers fish various waters and use the same landing nets and keepnets. This is a potential source for spreading disease from one fishery to another. At Oak Tree a "Net Dip" is provided and anglers are requested to dip all nets in the solution of disinfectant before fishing. However sometimes anglers fail to do this and a site presence helps to improve bio security by reminding them of this requirement.

6.0 Missed Opportunities and Future Development

6.1 Key decisions need to be made with a view to improving both the profitability and sustainability of the business in the longer term. Whilst originally planned on a sound financial basis, new income streams need to be made to make it more profitable and enable the owner to recoup some of his initial investment and for the business to become sustainable. This will require yet further investment. The owner is unwilling to increase this level of investment through the hatchery, cafe and stock ponds if no onsite accommodation can be achieved, as the risks from theft and systems failures are considered to be too high.

6.1.1 The provision of a small cafe would definitely increase the attraction of the fishing lake and caravan site and in turn increase the profitability of the business. Match anglers in particular prefer to have a cooked breakfast and currently this is missed opportunity. They regularly visit other establishments most of which are outside the immediate vicinity.

6.1.2 Night fishing is not currently permitted mainly due safety concerns and lack of on-site supervision. However this would improve the profitability of the business by the addition of a new income stream. The provision of a dwelling for a resident manager will facilitate routine monitoring of night time fishing activities and provide on site supervision and security.

6.1.3 The provision of electricity on site is considered vital for the future success of the business. A decision was made in January 2016 to proceed with the installation and this was completed three months later at a total cost of around £28k. Electric supplies have been provided for five caravan hook up`s and lake aeration equipment. Caravan occupancy should increase in numbers and by extending the season to become becoming a year round venue. Mains electricity is also essential for a fish breeding facility and water circulation in the ponds.

6.2 Develop Fish Breeding Business

6.2.1 Although the ponds support a variety of coarse fish that are all capable of breeding, there is no certainty that the fish will breed successfully or that their offspring will grow to catchable sizes. There is usually a massive predation fish eggs by other fish and large aquatic invertebrates. Fish fry are also prey to other fish and fish eating birds. Many younger fish die in the first winter during the colder months because a lack of suitable food and inadequate reserves of stored energy. This is especially true of common carp.

6.2.2 Other factors that influence fish stocks are the life span of the fish. They usually live 12-16 years and then begin to die through age related causes. Fish losses can also occur from angling. All these cumulative factors gradually reduce the size of the fish community and adversely impact anglers' sport. For this reason restocking is essential and routine in recreational coarse fisheries.

6.2.3 In the absence of an onsite hatchery, fish are purchased commercially and can vary considerably in quality and health. For example poor quality fish may be small but old (growth stunted) with little capability of future growth, they may carry disease and parasites. This is a massive risk for fisheries as it can inadvertently transfer fatal diseases to the stocked fish.

6.2.4 The way forward is therefore to become more self-sufficient so the fishery can meet its own need requirements, reducing the risk of the existing stock being jeopardised. The fish are either bought in as fry from bio secure nurseries and raised to larger sizes in controlled conditions and then transferred to the fishery or mated in the hatchery. The advantages include :

- knowing the quality and age of the fish,
- reduced risk of transferable disease,
- fish can be stocked in large or small numbers at any time irrespective of market conditions,
- loss of income from mortalities can be avoided
- any excess fish can be sold commercially generating an income stream.

6.2.5 It is therefore proposed to construct a purpose built hatchery and stock ponds. This will allow the business to breed and grow on fish for restocking directly into the two lakes. The existing site borehole will provide a clean water supply and the mains electricity will power pumps and aeration equipment. The hatchery will require some form of weatherproof enclosure to house the fish breeding tanks and associated equipment. The estimated cost to set up the facility being in the region of £5k. Carp and Tench would be the two primary species for breeding on site. Carp are hardy fish that are relatively easy to breed. They grow fairly rapidly and form the main species for stocking in commercial match fisheries. Tench on the other hand are much slower growing and therefore very expensive to purchase. It is estimated that it will take 3 years to get the hatchery/growing business established. It would be subject to rigorous health checks before fish could be utilised for re-stocking and available for external sales.

6.2.6 The fish rearing will operation will require significant time and energy and require a life support system for their essential needs. This involves feeding them regularly with nutritionally balanced foodstuffs, supplying oxygen through aeration, recirculation and cleansing of the water through a filtration

system which traps faeces to eliminate toxic ammoniacal waste and intervening immediately to identify and correct and fish health problems. Water quality and temperature will need to be monitored and any malfunction of the systems will need to be rectified immediately as the fish rely heavily on the life support systems and will die rapidly if the systems fail. Professionals in the industry suggest fish have a "10 minute golden window of opportunity" for intervention. After that mortality rates increase. It is therefore necessary for someone to be on hand to monitor and quickly rectify problems that arise.

6.2.7 Another benefit is that the fish breeding side is busiest in early spring, late autumn and the winter period. This is traditionally a time when the main fishing and caravan business is much quieter. The facility should then offer a significant revenue stream for the future. The table below shows the anticipated costs and revenue over a 5 year period. The acquisition of additional land is an option that could be pursued once the business has become established.

6.3 Table 3 Costs and Revenue from Fish Breeding

| Year | Annual Cost | Fish for Restocking | External Fish Sales | Comments |
|---------|-------------|---------------------|---------------------|---|
| 2016/17 | £4,000 | £0 | £0 | Set up costs for hatchery. |
| 2017/18 | £1,000 | £0 | £0 | Annual feed and maintenance costs. |
| 2018/19 | £1,000 | £5,000 | £3,000 | External Sales 1000 Carp at £300 per 100 fish. |
| 2019/20 | £2,000 | £6,000 | £8,000 | 2000 Carp at £350 per 100 fish. 500 Tench at £200 per 100 fish. |
| 2020/21 | £2,000 | £6,000 | £12,000 | 2500 Carp at £400 per 100 fish. 500 Tench at £5 per 100 fish. |

6.4 Construct a Site Cafe.

- 6.4.1 The provision of a small cafe would definitely increase the profitability of the business. Match anglers in particular prefer to have a cooked breakfast and currently this is a missed opportunity. They regularly visit other establishments most of which are outside the immediate vicinity. A number of chickens are currently kept on site and free range eggs could be sold together with other locally grown produce.
- 6.4.2 A log cabin type temporary structure would be ideal and the cost to set up such a facility would be in the region of £7k. Appendix 2 shows the layout and design of a typical structure. This is now deemed a priority together with the hatchery and fish breeding side.

6.5 Construct Additional Caravan Hard standings.

- 6.5.1 Currently the site has only one hard standing on the Certified Location (CL) and two on the Rally Field. By creating additional hard standings it will help provide all weather facilities and potentially extend the caravan season. The approximate cost to build a hard standing is £500. The usage of the current hard standings will be reviewed following the 2016 season and a decision then made on whether further investment is worthwhile.

6.6 Other Opportunities

- 6.6.1 The majority of the total site area of 7 acres is taken up by the two lakes, caravan areas and proposed fish breeding facility. However it is estimated that about half an acre of land is currently unused and unsuitable for the above activities. It is proposed that this land is cleared and used for growing on Christmas Tree seedlings. Seedlings cost £1.70 each and growing costs are estimated at £0.30 per year for fertiliser, watering and weeding. Trees take 5 years to mature and could be sold for £20 each. If 200 trees are grown on a rotating basis the potential income is an extra £2k per year.

6.7 The siting of a temporary dwelling for the site manager

- 6.7.1 Being able to live on site is considered to be the key requirement for the future success of the business. A 3 year temporary consent will allow time for the business to develop and the fish breeding side to become established. With the exception of the mobile home, the hatchery, stock ponds and small cafe are all appropriate infrastructure and amenity facilities for such a leisure use and it is the potential mobile home that generates the most planning interest.

6.7.2 It is proposed to site temporary accommodation for the manager on land near to the northern boundary of the fishery adjacent to the main car park. This will be within sight and sound of the main lake and give an immediate on site presence for security. It will also be close to the hatchery and within sight of the cafe.

6.8 Planning Policy

6.8.1 The application proposal is located in the open countryside. Application for agricultural and other rural occupational dwellings are currently assessed under the National Planning Policy framework (The Framework) which states at paragraph 55 "Local Planning Authorities should avoid new isolated homes in the countryside unless there are special circumstances such as the essential need for a rural worker to live permanently at or near their place of work in the countryside."

In addition, The Framework is only supportive of sustainable development which in the case of agricultural dwellings and other occupational dwellings is taken to mean that the enterprise is required to be financially viable, and capable of sustaining the cost of the proposed dwellings in the long term.

Most Inspectors and Local Planning Authorities still have regard to the guidance given in the former Annex A of PPS 7 as The Framework doesn't discuss this topic in any detail compared with Annex A and therefore can still be regarded as a useful guide. Therefore the application must pass the test of 'essential need' and to do this paragraph 12 & 13 of PPS 7 is examined. Paragraph 12 sets out five criteria which must be satisfied in order to justify a temporary occupational dwelling.

6.9 Firm intention to invest (i)

6.9.1 Paragraph 12 (i) states "Clear evidence of a firm intention and ability to develop the enterprise (significant investment in new farm buildings is often a good indication of intentions)". This test is clearly passed as the business is already operational and making a profit and this application includes a hatchery and cafe so yet further intentions to develop and invest in the business.

6.10 Functional Need (ii)

6.10.1 This is stated in paragraph (ii) of the annex A and referred back to paragraph 4. Here it is necessary to establish whether it is essential for the proper of the enterprise for one or more workers to be readily available at most times. An example is whether workers need to be on

hand day and night for instance care for animals or agricultural processes that require care at short notice. Also to deal with emergencies quickly that would otherwise cause serious loss of crops or products, like failure of automatic systems.

6.10.2 This is precisely the situation at Oak Tree Fishery, which has been explained in detail in the section on the issues facing the business in section 5. A presence on site is required to care for the fish in the angling lakes and breeding fish in the proposed hatchery and stock ponds. In short the functional requirement relates to:

- Immediate intervention required to rectify any failure in the fish rearing systems in the hatchery and stock ponds.
- Monitoring of fish welfare and routine feeding
- Monitoring the oxygenation of the lake and deployment of aeration equipment.
- Biosecurity
- Prevention from predation, theft and vandalism.

6.10.3 Fish rearing is essential for the business, as it gives an on demand supply of healthy fish and reduces the costs of buying in unsecure stock. Running a hatchery is time consuming and more importantly the fish's life support system, i.e. water flow, temperature, filtration system, pumps are all essential to the stocks survival. Fish retained in any condition are susceptible to outbreaks of disease, however these spread slowly in natural fisheries whereas infections can spread much quicker in semi sensitive conditions through the entire fish stocks due to the densities in which they are kept.

6.10.4 The small fish feeding rates and frequencies are in part a function of fish size. Small larval fish and fry need to be fed a high protein diet frequently and usually in excess. Small fish have a high energy and must eat nearly continuously and be fed almost hourly (small but often amounts). Feeding small fish in excess is not as much of a problem as overfeeding larger fish because small fish require only a small amount of feed relative to the volume of water in the culture system. As they grow the fish are weaned onto smaller pelleted whole foods the size of which and nutritional composition of which is dependent on the type of fish, their size and scale. The fish need at least one year's growing cycle before they are capable of being introduced to the stock ponds then lake.

7.0 Man Hours/Time Commitment

7.1.1 The whole process of running a successful fishery requires lots of general man hours, from running the hatchery and stock ponds, checking and maintaining the oxygen levels in the lakes, bio security, running the office and shop. This is set out below based on current and projected hours and confirms that the likely time commitment to develop Oak Tree Fishery to its potential will require a full-time Manager with additional part time staff. A total equivalent to 441 man days per year will be required as shown in the table below.

| Daily duties | Hours per day | Hours Per week |
|--|---------------|-----------------|
| Taking and making bookings, meeting customers, explaining the fishery rules and facilities, taking payments. | 1 | 7 |
| Patrolling the banks, enforcing rules, inspecting equipment, 4 times a day 30 min rounds. Security checks around the perimeter. (No supervision of anglers in winter if the lakes are frozen). | 2 | 14 |
| Daily inspection of the lake and its surrounding, feeding fish, checking no evidence of sick or dead stock, removing litter, checking water quality (oxygen levels up to 5 times per day in Summer), recording readings. | 2 | 14 |
| Checking and feeding reared fish in the hatchery and stock ponds. Monitoring water quality, maintaining the pumps, filters. 6 times per day @ 0.5 hours, plus any emergencies. | 3 | 21 |
| Accounting, banking and ordering consumables. | Wkly | 2 |
| Running the site cafe. Initially to be open weekends only. 6 hours on Saturdays and Sundays. | W.E. | 12 |
| Site Maintenance, grass cutting, weed clearing, tree and shrub management, peg and path maintenance. This varies season by season for instance grass cutting will not apply in winter months but may need cutting twice a week in summer. Average weekly figure. | Wkly | 8 |
| Total estimated hours per week: | | 78 |
| Hours per annum (49 weeks) allowing for holidays. | | 3,822 hours |
| Man-day per annum @ 8 hour day. | | 477 man-days |

7.1.2 Paragraph 6 to Annexe A to PPS7 indicates that site security cannot be the sole justification for a rural workers dwelling. However, it is recognised that it can contribute to the case, for instance where animal welfare issues arise. In this case there is a need to protect fish stocks from theft and injury. Poaching is not uncommon for two main reasons. Coarse fish are valuable as a live resource and also increasingly as a food source. Theft is very difficult to prevent on such an isolated site. The only practical solution is to have a permanent on site presence in the form of a resident manager.

7.1.3 Bio security issues are one of the reasons for developing a fish breeding facility on site. With this comes the need for even more stringent monitoring of fish and water quality.

7.1.4 Finally on need, this site is now much more than just a fishing pond. The proposal will develop a fish breeding facility and create a new site cafe/shop. These additional facilities will complement the existing coarse fishing lakes, Caravan Club Certified Location (CL) and rally field. The *applicant* has to meet and greet all caravan owners both in the rally field and CL. We acknowledge that this in itself isn't a functional need, however it contributes to the need for an onsite presence (this was also considered as part of the overall need in the Torne Bank application appendix 4). Customers do often turn up at irregular times and the owner needs to be on hand to meet and greet. The manager also at times acts as bailiff, office/shop manager, security guard, pest controller and is always on hand to meet the needs of the customers. A considerable amount of time is spent at the site ensuring everything is running in order through the day, however the business will certainly develop and caravan uptake will increase if there is an onsite presence.

7.1.5 Additional duties include the requirement to collect monies due, provide advice to customers, carry out maintenance and security duties. Oak Tree Fishery currently employs one full time manager and the intention would be that this person would be the permanent resident on site in order to fulfil the essential duties. Two part time staff currently assist the manager and as the business expands then this will increase to four part time staff.

8.0 The enterprise has been planned on a sound financial basis. (iii)

8.1.1 Oak Tree has been in business since 2008 and has been profitable in every year except one. Admittedly profits have been quite low but these should start to increase significantly following the recent

with the second lake. The only year the business made a loss was in 2015 when the major fish kill impacted on profits. The owners are keen to develop the business further and are prepared to invest in a breeding facility and site cafe. The aim being to establish the business to a sustainable level for the future. In order to do this the provision of a temporary dwelling on site is considered essential. This is a 3 year window for the business to show it can make increased profits. The reassessment of this new investment and business development planning will be considered in a further 3 years if permission is granted.

8.1.2 The increased profits will derive from developing the fishery to its full potential. Income is currently from the day ticket sales, match events and a small number of bait and accessory sales from the cabin. The proposal is to increase day ticket sales, bait, accessory sales, revenue from the cafe and new income from fish rearing in the hatchery and rearing ponds. The need to purchase establish stock will also decline over time once the hatchery becomes self sufficient so it's a cyclical process. Excess fish can also be sold and the tables demonstrate this is a valuable income stream for the business.

8.1.3 Since the land is within the ownership of the business the only additional cost is that incurred in the siting of the dwelling. The design solution chosen is a simple log cabin type structure which will comply with the requirements of a temporary building. The total cost is expected to be in the region of £90,000 with a view to retaining it in the long term if the businesses successful and a permanent accommodation granted, however a far cheaper alternative caravan if necessary for the first 3 years. Tables 2 & 3 show the profit and

8.2 Fishing Income

8.2.1 The income derived from coarse fishing is dependent on the location of the site in terms of distances from large centre of population, ease of access, safety, its facilities i.e. bait shop/cafe, the nature and size of the fish stocks, the overall attractiveness of the site i.e. its tranquillity and the price charged for a day ticket compared with its competitors. The fishery has 44 pegs and fishing is general more popular in warmer months. It's assumed that 25% occupancy of the pegs occurs in the mid week and 50% at weekends in the summer. In the winter months attendance may be a third of these figures so 8% and 16 % respectively. This assumes the lake would be open all year round with on site accommodation. Allowing for a 3 week period in winter when fishing may not be possible due to adverse weather, there are 110

weekdays, 43 weekend days in the summer period (1st May – 30th Sept), 135 weekdays and 57 weekend days in the winter.

Using the current £6 day ticket the potential income from the 44 pegs could be:

Summer: (midweek) 25% x 44 pegs (11) x 110 days at £6 = £7260

Weekends 50% of 44 pegs (22) x 43 weekend days x £6 = £5676

Winter: (mid week) 8% x 44 (3.5) x 110 x £6 = £2310

Weekends 16% x 44 (7) x 57 x £6 = £2394

So the fishery has the potential to generate £17,640 and yet more if occupancy rates on the pegs increase. This is based on assumptions and doesn't take into account any reduced rates for concessions and no income from match angling as the pegs would not be fished during matches.

8.2.2 On site sales: sales from the cafe will generate additional income. If small items of food or drink are purchased by the estimated visits around 2700 per year buy an item at £1.50 this would generate £4,050 less the cost to purchase the item, and if breakfasts and snacks are sold in the cafe at £4 then based on 50% of anglers using it 2700 divided by 2 = 1350 x £4.00 cooked breakfast or lunch creates £5400 less the cost of the produce and utilities. This is all relative and depends on the popularity of the lake and cafe and this can be reassessed in 3 years. Sales could also be boosted by bait and equipment sales as is currently the case.

8.2.3 The final element is selling excess fish produced from the hatchery. The hatchery and growth of fish is an annual exercise which should yield a crop of fish every year. Providing the life support systems are maintained these should be healthy and capable of rearing an estimated 2-300 kg of fish per annum based on the size of the growing tanks and operation. Once the owner has perfected this he expects sales to increase from £3000 in 2018 (once established) to £12000 annually. The hatchery and stock ponds also have room to extend if this proves to be necessary.

8.3 Table 4 Projected Income

| Year | Fishing | Caravans | Cafe | Fish Sales | Turnover | Running Costs* | Net Profit |
|---------|---------|----------|---------|------------|----------|----------------|------------|
| 2016/17 | £14,000 | £2,000 | | £0 | £16,000 | £6,000 | £10,000 |
| 2017/18 | £18,000 | £4,000 | £8,000 | £0 | £30,000 | £11,000 | £19,000 |
| 2018/19 | £18,000 | £6,000 | £10,000 | £3,000 | £37,000 | £12,000 | £27,000 |
| 2019/20 | £19,000 | £8,000 | £12,000 | £8,000 | £47,000 | £12,000 | £36,000 |
| 2020/21 | £20,000 | £9,000 | £15,000 | £12,000 | £56,000 | £13,000 | £43,000 |

* The running costs include fixed and variable overheads. Fixed costs include rates, insurance, general maintenance and repairs, administration etc. Variable costs include cost of broodstock, fish feed, electricity for water aeration and heating, consumables for site cafe.

9.0 The functional need could not be fulfilled by another existing dwelling on the unit, or any other existing accommodation in the area which is suitable and available for occupation by the workers concerned. (iv)

9.1.1 This test is set out in paragraph 12 (iv) but is not given further explanation in PPS7. There is clearly no other accommodation on site that fulfil the purpose of a managers dwelling therefore my client has chosen to apply to station a temporary mobile home on the site. The mobile home is freely removable should the business not make sufficient profit over the next 3 years to warrant its retention or the building of something more permanent.

9.1.2 The functional need relates to this particular site and no other remotely, sited dwelling would fulfil the needs of the business. Solely from a security perspective any off site dwelling would not be able to monitor the site or provide that onsite presence for emergency purposes.

9.1.3 It is however necessary to assess the availability of other dwellings in the locality for purchase or rent. My client would favour renting a property due to the amount of risk associated with any business. The reason being is that too much capital would be tied up in the building and should the venture fail then this would be a useless asset to the company which make take time to sell and recoup the capital outlay. Capital outlay would be better employed in the business. Therefore a

rental property would be the preferred option. This will however limit the choices from available stock in the area and the required rental period would be 3 years which is uncommon as a letting term. My client would want the 3 years tenancy security in order to run the business over the respective trial period. Moving or having to find a further property every 6-12 months would not be conducive for the business.

- 9.1.4 As with any housing search, suitability and availability is the key consideration as outlined in (iv). Affordability - Is the purchase or rental price within the range that could be afforded by a rural worker employed in the enterprise concerned. Any search would have to consider type of dwelling and quality, distance from the site and length of rental term.
- 9.1.5 The applicant would contend that in order to be considered suitable the requirement is for a dwelling that is within sight and sound of the fishery in order to satisfy the functional needs previously identified. It should also be of modest size to house one worker and immediate family.
- 9.1.6 The villages that are closest to the site are Graizelound, Haxey, East Lound and Westwoodside. The area is essentially rural and another other settlement beyond these identified would not allow sufficient time for the owner to attend the site within 10 minutes of any alarm being raised (i.e. be awoken in the middle of the night by a phone call/alarm to dress, get the car out of the garage (to prevent freezing in winter) drive to the site, open the site gates, open the hatchery to and diagnose the problem. 10 minutes is regarded as the 'golden window' to respond to a call out for fish welfare. Below shows the geographical location of Graizelound in relation to the other settlements.



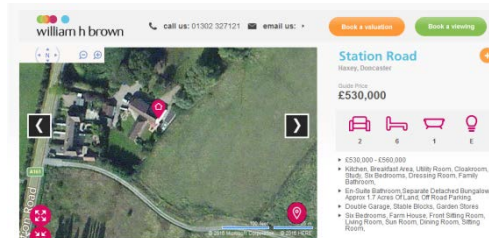
9.1.7 The internet search has identified only 6 available for rent in the area, 2 were flats and two were small unsuitable 2 bed dwellings. None are within the villages identified and are within Epworth within 4 miles to the north of the site. The properties identified for rent are within appendix 4.

| Currently available to rent near Graiselound Fields Road, Haxey, Doncaster DN9 | | | | |
|---|----------|----------|----------|-------|
| Type | 1 bed | 2 bed | 3 bed | 4 bed |
| Houses | <u>1</u> | <u>2</u> | <u>1</u> | - |
| Flats | - | <u>2</u> | - | - |
| All | <u>1</u> | <u>4</u> | <u>1</u> | - |

| Currently available for sale in Haxey | | | | |
|---------------------------------------|-------|----------|-----------|-----------|
| Type | 1 bed | 2 bed | 3 bed | 4 bed |
| Houses | - | <u>3</u> | <u>15</u> | <u>15</u> |
| Flats | - | - | - | - |
| All | - | <u>3</u> | <u>15</u> | <u>15</u> |

9.1.8 A search for dwellings for sale has identified several in the locality, but as discussed my client would only rent and therefore these can be discounted. My client is aware of a dwelling very close to the site being

for sale i.e. White House Farm but this is on the market at £530,000 and beyond the means of my client. Its location would be simply more convenient than my client's current dwelling in Chapel Close, Misterton. However it would still not be within sight and sound of the fishery, but would prevent the need to drive to the site in case of an emergency.



9.1.9 It is therefore clear that there are no suitable or available properties in the local area capable of fulfilling the functional need. The sequential test in respect of nearby dwellings has therefore been passed.

10.0 Are other planning requirements met?

10.1.1 The final requirement set out in paragraph 12 (v) of Annex A to PPS7 is that other planning requirements, for example in relation to access or impact upon the countryside, should be satisfied.

10.1.2 Access - The temporary accommodation would share its access with the existing track serving the main car park. The level of traffic generated by the dwelling would be minimal and there would be no need for any additional access onto the public highway. Visibility is satisfactory in both directions when existing and entering the site.

10.1.3 Flood Risk - A Flood Risk assessment has been prepared and submitted with this application. The dwelling would be located on a slightly elevated area near to the main entrance and therefore not susceptible to flooding.

10.1.4 Impact on the Countryside - The location of the mobile home has been chosen for security purposes however takes advantage of the local topography and existing landscape features. Trees and hedging surround and screen the property on three sides and the mobile home is only single storey and therefore has no wider impact on the character or openness of the countryside. If any future or permanent dwelling/mobile home is permitted then this is also likely to be single storey to maintain this impact.

10.1.5 The other elements of the permission have very little overall impact and are appropriate structures in rural area, i.e. poly-tunnel and stock ponds. The café replaces an existing temporary cabin and whilst being slightly larger is well screened and will have no impact on the character of the area. The café would only be used for customers of the caravan or using the fishery and no additional advertisement would be required, so as to discourage passing trade.

11.0 Projected Income 2016 to 2020

11.1.1 This information supplements the arguments within criteria (iii) of PPS 7 in terms of planning on a sound financial basis. For 2016/17 both the fishing and caravan revenue should show a step increase. The Snake Lake is now fully open from 2016 for club and open matches. The caravan rally field will also be fully available to take up to 35 caravans and motor homes on club rallies. This should also help to significantly boost day ticket fishing income.

12.0 Employment

12.1.1 Direct employment within the business will increase in line with the projected growth as it moves towards a year round facility. The business will be able to sustain one full time and at least three maybe four part time employees within three years. The increase in visitor numbers will be also be a significant benefit to the local economy. Caravan customers in particular regularly use local shops and eating establishments. The indirect benefits to the local economy cannot be underestimated.

13.0 Visitor Numbers

13.1.1 Based on the growth and income projections the following visitor numbers are anticipated. Table 5 shows details of visitor numbers and site movements.

13.1.2 Table 5 Expected Visitor Numbers

| Year | Anglers | Cara- vans | Additional Visitors To Site/Retail | Delivery Vehicles | Total Annual Vehicles | Total Daily Vehicles |
|-------------|---------|---------------|---|----------------------|-----------------------------|-------------------------|
| 2015/ 16 | 2000 | 300 | NA | 3 | 1600 | 9 |
| 2016/ 17 | 3000 | 700 | 300 | 15 | 3700 | 11 |
| 2017/ 18 | 3400 | 750 | 500 | 30 | 5300 | 14 |
| 2018/ 19 | 4900 | 800 | 800 | 40 | 6000 | 15 |
| 2019/ 20 | 5100 | 800 | 1000 | 45 | 6100 | 18 |

14.0 Torne Bank Comparisons:

14.1.1 Finally the owner is trying to develop the business in a similar way to the nearby Torne Bank Fishery at Epworth. Torne Bank Fishery is a 25 peg lake that had permission in 2007 to extend the lake under reference PA/2007/1147. Torne Bank has many direct similarities to Oak Tree Fishery in that it too has a caravan club, toilet block, smaller lake (25 pegs) and hatchery business.

More importantly the owner received planning permission in 2010 under reference PA/2010/1024 to locate a temporary dwelling to oversee the fishery and hatchery to enable fish to be produced on site. Following the temporary consent, the existing mobile home was applied to be retained in 2013 under reference PA/2013/1309 (Planning permission to transfer a 'temporary agricultural' dwelling to a permanent onsite residence for use by the land owner).

This was eventually granted approval on the 16th Dec 2015 owing to the need to overcome flooding issues by providing a partial second storey on the dwelling as a suitable place to sleep given the flood zone status.

Having assessed the original 2010 temporary consent this was approved based on very limited information and effectively proved the 'need' to be on site. From then on it was simply a case of the owner making sufficient income to sustain the business and be profitable.

The committee report into the approval to retain the temporary dwelling (attached as appendix 4) states "financial records have been submitted which demonstrate that the fishing business was financially sound and profitable" and that "income was derived from the fishery and hatchery aspects of the business". "Since the original application the applicant has further established the business and demonstrated that it is profitably sound."

Finally the most key paragraph "In terms of the requirement for the being located at the site on a permanent basis, the applicant has submitted a supporting statement with the planning application. The statement submits an on-site presence is required to supervise the fish breeding business and respond to the changing needs of the hatchery. The retention of this dwelling on a permanent basis is necessary for the purposes of site management, to supervise the fish breeding operations and provide an on-site presence for the fishing lakes and the caravan and camping site".

14.1.2 Given the above we accept that each case must be considered on its own individual merit, however it's clear to see that these two cases have direct similarities. The pre application response from the LPA inferred that Torne Bank was more established which is marginally true, however the lake and other facilities were only extended in 2007, which was a similar time to Oak Tree Fishery. Oak Tree is now much larger with 44 pegs and has all the same facilities at Torne Bank except for hatchery business which this permission is seeking to develop. The owner sees this as the natural progression for the business and the more effective way to sustain it in the long term. The hatchery needs to be given a chance to develop, however this can only be done with an onsite presence.

15.0 Summary

15.1.1 This Business Plan aims to provide a basis for reviewing performance and identifying future investment opportunities. Funds are available to expand the business subject to gaining the necessary planning approvals. On site temporary accommodation for the Site Manager is deemed essential to provide the required security and monitoring to the fishing lakes and proposed hatchery are successful in the future. This is an established rural business that has been encouraged to grow by successive planning permissions and the hatchery, café and stock ponds will be the next phase in its expansion. This will however not be possible without the presence of an onsite manager and is essential for the future viability of the business. I therefore respectfully request that the proposed development be permitted.

Appendix 1- Mendip Log cabin.



3105101 LAVIS LUG LIVING

Room Dimensions -
Imperial measurements

Lounge: 21' 2" x 14' 1"

Dining Room: 14' 4" x 9' 11"

Kitchen: 14' 4" x 11' 0"

Utility Room: 11' 1" x 6' 11"

Bedroom 1: 14' 3" x 12' 0"

Dressing Room:
7' 10" x 6' 11"

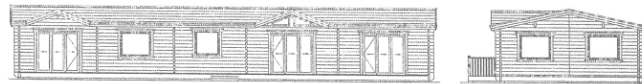
Shower Room: 6' 0" x 6' 11"

Bedroom 2: 12' 0" x 10' 0"

Bedroom 3: 11' 1" x 10' 0"

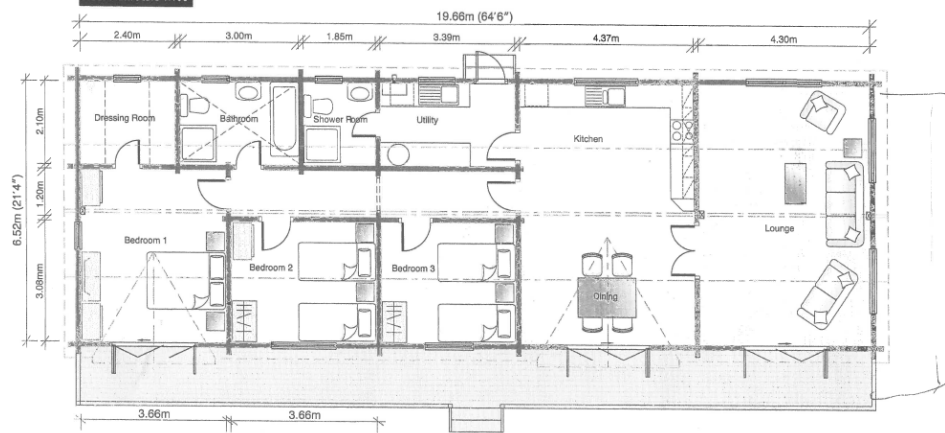
Bathroom: 9' 10" x 6' 11"

The various options shown here
for furniture and fittings are
for illustration purposes only

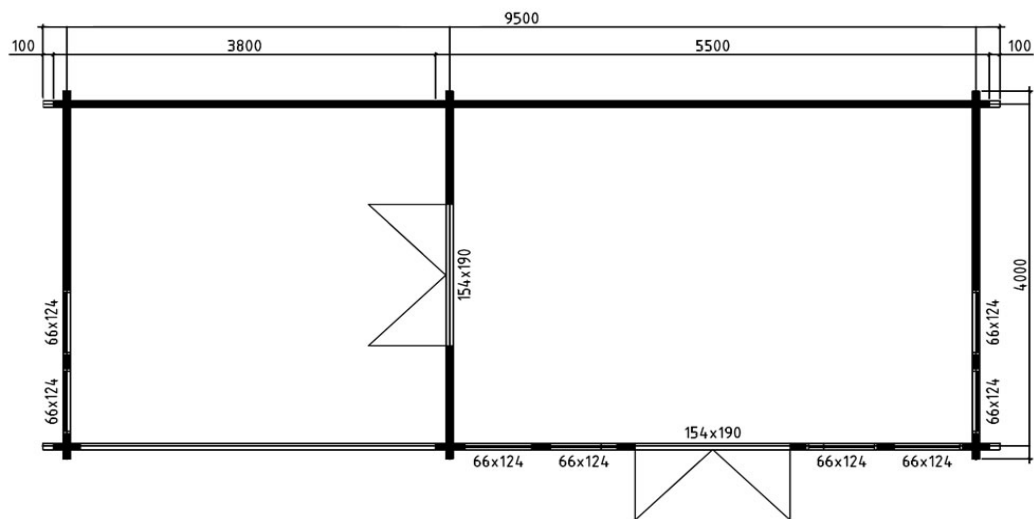


Elevations/Scale 1:200

Floor Plan/Scale 1:100






Appendix 2, typical example of the cafe and its dimensions



Appendix 3 search for other dwellings in the locality


Property to rent near **Graiselound Fields Road, Haxey, Doncaster DN9**


1 - 6 of 6 25 ▾ Most recent ▾   

[Filter results ▾](#)

create an alert we will notify you when we have available listings that match you



Keywords and filters like garden and parking live here ✕



 6



Listed on 20th Jun 2016 by
Keith Clough Estate Agents, DN9





£650 pcm (£150 pw)


 2  1 [Fees apply](#)
[2 bed flat to rent](#) **Just added**
Church Street, Epworth DN9


Available immediately


Two bedroom executive flat

 Crowle (4.4 miles)  Althorpe (5.5 miles)

 01427 360944  [Contact](#)  [Save](#)  [Hide](#)







 5



Listed on 20th Jun 2016 by
Keith Clough Estate Agents, DN9





£450 pcm (£104 pw)

 2  1 [Fees apply](#)
[2 bed town house to rent](#) **Just added**
Forge Drive, Ewporth DN9

Available from 20th Jul 2016

Two bedroom town house

 Crowle (4.1 miles)  Althorpe (5.5 miles)

 01427 360944  [Contact](#)  [Save](#)  [Hide](#)



5

Listed on 20th Jun 2016 by
Keith Clough Estate Agents, DN9

£650 pcm (£150 pw)

2 2 Fees apply

[2 bed flat to rent](#) **Just added**

Belton Road, Epworth DN9

Available immediately

Two bedroom luxury apartments.

➤ Crowle (4.2 miles) ➤ Althorpe (5.4 miles)

☎ 01427 360944

✉ Contact

★ Save

🔍 Hide

Keith Clough
THE ESTATE AGENT



1

£575 pcm (£133 pw)

2 1 2

[2 bed bungalow to rent](#)

Manor Road, Morton, Gainsborough, Lincolnshire DN21

Available immediately

A detached bungalow in a popular village location. The accommodation comprises of Entrance hall, lounge, dining room, fully fitted kitchen with appliances, utility room, conservatory, 2 bedrooms and family bathroom. The property benefits from gas ...

➤ Gainsborough Central (1.3 miles) ➤ Gainsborough Lea Road (:

justlettings
Specialist Letting Agency

Listed on 13th Jun 2016 by
Just Lettings Ltd, DN21

☎ 01427 671040 ✉ Contact ★ Save ⌂ Hide



📷 8

£575 pcm (£133 pw)



🛏 3 [Fees apply](#)

[3 bed terraced house to rent](#)

Plot 28 15 Bramley Way, Misterton, Doncaster DN10

Available immediately

Burgin Atkinson are delighted to offer this Three Bedroom townhouse available to let. Comprising of a Kitchen, Utility room, Dining Room, Downstairs W/C, Lounge, Three Bedrooms (One En-suite) and a family bathroom. Please call to arrange a viewing! ...

📍 Gainsborough Central (3.5 miles) 📍 Gainsborough Lea Road (

Listed on 31st May 2016 by
Five Star Property, DN22

☎ 01777 717035 ✉ Contact ★ Save ⌂ Hide



📷 10

£425 pcm (£98 pw)



🛏 1 🚗 1 🚗 1 [Fees apply](#)

[1 bed terraced house to rent](#)

Reliance Cottages Gringley Road, Walkeringham, Doncaster DN10

Available from 2nd Jul 2016

Beautifully presented mid terrace cottage offering charm and character. Situated in the old part of popular North Nottinghamshire village, Walkeringham, near the Church and Manor House. Fully furnished and carpeted throughout to a high standard in ...

📍 Gainsborough Central (3.3 miles) 📍 Gainsborough Lea Road (

Listed on 27th May 2016 by
Make Ur Move, M1

☎ 0161 937 6724 ✉ Contact ★ Save ⌂ Hide

Appendix 4 – Torne Bank Fishery (attached as a separate document)

