



**SUPPORTING STATEMENT IN RELATION TO A
FULL PLANNING APPLICATION FOR THE ERECTION OF A
LIVESTOCK BUILDING
ON LAND**

AT

**MOUNT PLEASANT FARM
WINDYCOTE LANE
DILHORNE
STOKE-ON-TRENT
ST10 2PP**

ON BEHALF OF

**MR R CAMPBELL
C & R LIVESTOCK HAULAGE LTD**

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1.0 INTRODUCTION

- This Report has been produced to support a Full Planning Application to Staffordshire Moorlands District Council in relation to a proposal to erect a livestock building for use as a livestock collection centre at Mount Pleasant Farm.
- The applicant, Mr R Campbell operates C & R Livestock Haulage Limited, a livestock haulage service for farmers in the Staffordshire, Derbyshire, Peak District and surrounding counties. The applicant has extensive experience of the livestock sector and the handling and movement of livestock.
- Following a number of statutory changes in relation to livestock movements, bio-security, Assurance schemes and logistics, a livestock building is required which will be used as a registered livestock collection centre. Further details in relation to the background and justification are provided later in this Report.
- The proposed livestock building is of a typical construction of this type and use. Consideration been given to a number of siting and design options on the land within the applicants control and this is considered to be the most appropriate site for a livestock building on this holding.

2.0 REQUIREMENT FOR A LIVESTOCK BUILDING

2.1. Background to C & R Livestock Haulage Limited

- The applicant established 'C & R Livestock Haulage Limited' in June 2010, having worked for a local haulier for over 17 years. Over this time, the applicant gained considerable experience in the moving and handling of livestock and has extensive contacts in the industry.
- Primarily, the business provides a service to local farmers in Staffordshire, Derbyshire, the Peak District and surrounding counties collecting livestock from individual farms. Finished livestock are then taken to a range of outlets including livestock markets (at Leek, Bakewell, Market Drayton, Bridgnorth, Ludlow, Beeston Castle & Newark), national and local abattoirs. The business serves approximately 300 farmers in the area and has a substantial and varied agricultural customer base.
- In addition, haulage services are provided to the breeding sales which are across a wide geographical area depending on the type, species and age of the livestock. 'Farm to farm' haulage is also provided for private sales and purchases.
- The business runs a number of livestock lorries which vary in length from 28ft to 50ft. Over 50% farms in the area cannot be accessed with a larger lorry and therefore it is necessary to collect with a smaller lorry. Further details in relation to the logistical problems and legislation requirements are provided later in this Report.
- When not in use, the lorries are stored and maintained at a local garage.

2.2. Statutory Changes to Livestock Movements

- As noted above, it is impossible to access over 50% of farmers with the larger lorries which typically take livestock on the longer journeys to their destination. Therefore it is necessary to collect livestock from individual farms with a small lorry and then transfer these over to the larger transport.
- Prior to the introduction of the legislation changes and new Assurance standards, this practice was widely used and known as 'tailgating'. A photograph is provided below to illustrate this practice.

Photograph illustrating livestock being transferred by 'tailgating'



- The above practice is now illegal under the Red Tractor Assurance Scheme legislation.
- The Red Tractor Assurance scheme recognizes the problem and have released a Guidance Note for Livestock Farmers and Hauliers. A full copy of this Guidance Note is approved in Appendix I, however relevant extracts have been included below.

Extract from the Red Tractor Assurance Guidance Note

CHALLENGES :

- Large livestock vehicles can't access many remote livestock farms or some on-farm loading pens
- Livestock journey lengths often need to be minimised to improve efficiency

ASSURANCE RULES:

All assured livestock must be transported and handled in accordance with legislation¹ **and** must be transported from an assured farm either:

- in the farmers own trailer/ lorry that has been assessed as part of the farm assurance scheme
- or by a vehicle assured as part of a commercial Livestock Transport Assurance Scheme²

Any site, (whether a farm, market or hauliers premises) used to bring livestock together for onward consignment must be assured under the Red Tractor Assurance Livestock Market and Collection Centre Scheme.

WHAT NOT TO DO:

- X Do not** tailgate on a public road or in a layby adjacent to a public road. This is illegal and there are serious disease and safety concerns by doing this.
- X Do not** use non licensed collection centres. These sites are operating illegally, they cut corners and do not record and report movements – these practices jeopardise the ability to efficiently deal with a disease outbreak.



- Firstly, this Guidance Note recognizes the problems associated with accessing rural farms and challenges which are faced to minimize journey lengths for livestock.
- There are Industry pressures for hauliers to meet the necessary Assurance standards to ensure that the business is able to serve 'Red Tractor' assured farms, which are the majority of the farms in area.
- No tailgating is permitted in any public road or layby.

Extract from the Red Tractor Assurance Guidance Note

SOLUTION TO THE CHALLENGES:

If access to farm facilities by lorries is limited you could either:

- ✓ Tail gate **only within** the farm boundary but this must be done:
 - Using trailers / vehicles cleansed and disinfected since last use
 - Transfer within the farm boundary and when parked on a hard standing surface
 - Drop the trailer tailgate onto the tailgate of the collecting vehicle – the animals **must not** run on the ground and the transfer must be done safely; ramp-angles must be legally compliant
 - Make the transfer secure using hurdles/ barriers/ gates
- ✓ Or use assured smaller lorries/trailers to take livestock to an assured **and** AHVLA licensed collection centre, where they are loaded onto a larger vehicle for an onward journey.

- There are two solutions covered in the Guidance Note which have been explored by the Applicant. The first solution states that hauliers should '*Tail gate only within the farm boundary*'. The practical implications of this solution are that the majority of the farmers landownership does not extend sufficiently to a highway with access for larger lorries. In the vast majority of scenarios, the remote and rural farmers have poor access routes which extend much further than their farm drive. Therefore, this solution is not practical to implement in the majority of cases.
- The second solution requires the use of an assured AHVLA licensed collection centre, being a livestock building which meets the statutory assurance requirements. The proposed building at Mount Pleasant Farm will be used for this purpose.
- An assured livestock collection centre must meet the highest standards of biosecurity to ensure that disease control measures are in place. In addition, protection against vermin and wildlife is required to meet disease control measures.

2.3. Logistics of Moving Livestock

- As noted above, it is impossible to access the majority of remote rural farms with a large livestock lorry. The tailgating provisions on the farm boundary as noted within the Red Tractor Assurance standards are not feasible in the vast majority of cases. Therefore a livestock collection centre is required.
- The applicant's move a range of species of livestock from all sectors including dairy, beef, sheep and pig farms. The statutory and practical movement requirements vary considerably and need to be determined on a case by case basis.
- For example, barren (non-breeding) cows are collected from a number of farmers in the area, usually 1-2 in number and then taken a specialist abattoir in Shropshire. Unless the applicant is able to amalgamate these cows together to result in a single journey, collecting and delivering cows individually to Shropshire is wholly unsustainable and would result in a significant increase in the number of HGV vehicle movements on the transport network. This would also have a significant economic impact on the sector as the costs of transport would increase substantially.
- It is widely recognized that efficiency is achieved in the livestock haulage sector by reducing the number of vehicle movements by making a single journey with more livestock, this is particularly important when making longer journeys, for example to national abattoirs and livestock markets all over the Country.
- If the business does not have a Livestock Collection Centre, this will result in a significant financial impact on the applicants business and secondly, a wider economic impact on Staffordshire, Derbyshire and Peak District Farmers, as haulage costs for certain livestock services will increase significantly.

2.4. Animal Welfare

- In order to maintain high standards of animal welfare, the appropriate facilities must be available to the business.
- Within the proposed livestock building, animals will be housed in pens according to their species, size, sex and origin.

- During the animals time at the collection centre, animal welfare standards must be maintained. The Farm Animal Welfare Council defines five ideals, known as the 'Five Freedoms', by which animal welfare should be tested. These five freedoms are as follows, and farm animals should have:- freedom from fear and distress; freedom from fear of pain, injury and disease; freedom from hunger and thirst; freedom from discomfort; and freedom to express normal behaviour. Each animal has easy access to both food and water.
- The livestock building will be regulated by the Animal Health and Veterinary Laboratories Agency (AHVLA) and Red Tractor Assurance Inspectors.

2.5. Livestock Buildings Available to the Business

- Prior to the introduction of the changes to the legislation in relation to tailgating, the applicant would transfer livestock either at local livestock market or in a layby. This practice is now illegal and such practice would result in both the farmer (owner of the livestock) and haulier losing the 'Red Tractor Assurance' status, thus having a financial impact on both businesses.
- There are no suitable livestock buildings of this size within the applicants land ownership. Due to the strict bio-security requirements, particularly in the event of a disease outbreak, it is not possible to locate this type of unit on another farm or within a livestock market. Both examples would result in the building being outside of the applicants control and not able to meeting the Legislation and Assurance standards.

2.6. Wider Benefits

- The business provides employment for 8 full time and 2 part time drivers. It is vital that such businesses are able to adapt to industry changes and continue to provide an efficient and professional level of service to the local farmers and livestock keepers.
- The logistics of moving livestock need careful consideration to ensure that livestock are moved efficiently. The installation of a livestock building will bring economic benefits and stability to the sector, allowing the continued movement of livestock from farmers to abattoirs efficiently whilst complying with the various legislation and assurance standards.

- As noted previously, if this efficiency could not be achieved, this would result in a significant increase in haulage costs which would have a direct impact on farmers in the locality.

3. NATIONAL AND LOCAL PLANNING POLICY

- The NPPF was introduced on 27th March 2012 to replace the present many of the previous national planning policy statement and guidance documents. The purpose of planning, as clarified within the Ministerial Foreword to the NPPF is to achieve sustainable development. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. In addition to Local and Community plans, the NPPF is a material consideration in planning decisions.
- The extracts from the NPPF which are relevant to this proposal are detailed below, in addition to the extracts from Planning Policy Statement 7 (PPS7) that were relevant prior to it being replaced.

3.1 Achieving Sustainable Development

- **Paragraph 7** confirms that there are three dimensions to sustainable development: economic, social, and environmental. These give rise to the need for the planning system to perform a number of roles:-
 - *"An economic role – contributing to building a strong, responsive and competitive economy*
 - *A social role – supporting strong, vibrant and healthy communities*
 - *An environmental role – contributing to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change..."*
- In **paragraph 12** The NPPF confirms that proposed development that accords with an up-to-date Local Plan should be approved. However, at the heart of the NPPF is a **presumption in favour of sustainable development**, *"which should be seen as a golden thread running through both plan-making and decision-making"*.
- **Paragraph 14** confirms that for **decision-taking** this means:
 - *"approving development proposals that accord with the development plan without delay; and*
 - *Where the **development plan is absent, silent or relevant policies are out-of-date, granting permission unless:***

- *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole; or*
- *Specific policies in this Framework indicate development should be restricted”.*
- **Paragraph 15** confirms that policies in Local Plans should follow the approach of the presumption in favour of sustainable development.

3.2 Core Planning Policies

- There are twelve core land-use principles that underpin both plan-making and decision-taking. The principles are that planning should:-
 - *“be genuinely plan led, empowering local people to shape their surroundings...;*
 - *Not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;*
 - *Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of the area, and respond positively to wider opportunities for growth...;*
 - *Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*
 - *Take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character of the countryside and supporting thriving rural communities within it;*
 - *Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the use of existing resources including conversion of existing buildings, and encourage the use of renewable energy resources (for example, by the development of renewable energy);*
 - *Contribute to conserving and enhancing the natural environment and reducing pollution...;*
 - *Encourage the effective use of land by reusing that has been previously developed...;*

- *Promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas; recognising some open land can perform many functions (such as for wildlife, recreation...);*
- *Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;*
- *Actively manage patterns of growth to make the fullest possible use of public transport...;*
- *Take account of land support local strategies to improve health, social and cultural wellbeing for all...”.*

3.3 General Policies

- **Section 3 (paragraph 28)** of the NPPF is titled Supporting a prosperous rural economy. This states that:-
 - *“Planning policies should **support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development**. To promote a strong rural economy, local and neighbourhood plans should:*
 - *Support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;*
 - *Promote the **development and diversification of agricultural and other land-based rural businesses**...;*
- **Paragraph 32** states that development should provide *“safe and suitable access to the site can be achieved for all people”.*
- **Section 7** of the NPPF relates to the requirement for **good design**. In paragraph 56 it confirms that *“the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”.*
- **Section 11** relates to **“Conserving and enhancing the natural environment”**. Paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by:-
 - *“protecting and enhancing valued landscapes, geological conservation interests and soils;...*

- *Minimising the impacts on biodiversity...*
- *Preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability...".*
- **Paragraph 112** seeks to ensure the protection of the best and most versatile agricultural land, none of which will be taken by this proposal.
- **Paragraph 123 relates to noise** and confirm that planning policies should aim to avoid noise from giving rise to significant impacts on health and quality of life as a result of new development. This proposal will not create any detrimental noise or other impact and is compliant with these requirements.
- **Section 12 of the NPPF is titled "Conserving and enhancing the historic environment"**. The essence of the various statements within this are that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance. In this case there are no heritage assets impacted by the proposal.

3.4 Green Belt Policies

- **Paragraph 88 states that:** *"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."*
- **Paragraph 89 confirms that** *"A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:*
 - ✓ ***buildings for agriculture and forestry***
 - ✓ *provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it*
 - ✓ *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building*
 - ✓ *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces*

- ✓ *limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan*
- ✓ *limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development*

- In accordance with the current planning framework (NPPF) this report addresses the justification and needs for a new livestock building to serve this identified need and hence why this proposal is compliant with planning policy.

3.5 Local Plan Designations

- Under the current Local Plan, the application site is within the Greenbelt as designated across the wider area.
- To the North West of the application site, there is an 'SMDC Nature Conservation Site' which runs along the single track road extending back to the main road. It would appear that this designation relates to the hedgerows which form the roadside boundary.
- Below is an extract from the Local Plan Interactive Map showing the proximity of this designation to the application site.

Extract from the Local Plan Interactive Map



3.6 Local Plan Policies

- Consideration has been given to the relevant policies under the Local Plan '*Core Strategy Development Plan Document (Adopted 2014)*'
- Policy SS6a of the Core Strategy supports development in the countryside which meets an essential local need and supports the rural diversification and sustainability of the rural area.
- Policy R1 of the Core Strategy states that all development in the rural areas outside of the development boundaries of the towns and villages will be assessed according to the extent to which it enhances the character, appearance and biodiversity of the countryside, promotes the sustainable diversification of the rural economy, facilitates economic activity, meets the rural community need and sustains the historic environment.
- Policy DC3 of the adopted core strategy states that the Council will protect, and where possible, enhance local landscape and the setting of settlements in Staffordshire Moorlands by supporting development which respects and enhances local landscape character and reinforces and enhances the setting of the settlement.
- Spatial Objective, SO11 states "*To reduce the need to travel or make it safer and easier to travel by more sustainable forms of transport*". Policy T1 aims to encourage sustainable modes of transport and ensure that all new development is located where the highway network can be satisfactorily accommodated in the existing highway network.

3.7. Planning Policy Discussion

- Firstly, it is necessary to consider the use of the building. The proposed building will be used solely to house livestock from farmers in the locality. The adjoining pasture will be used for the grazing of livestock under the control and restrictions of a Livestock Collection Centre. Therefore, it is considered that the land and proposed building will be used solely for agricultural purposes on an agricultural unit.
- Furthermore, the application site is within Greenbelt and therefore paragraphs 88 and 89 of the NPPF are relevant. Buildings used for agricultural and forestry purposes are one of the 'exceptions' to *inappropriate in Green Belt*. Therefore, in principle, this development is not considered to be inappropriate development in the Green Belt.

- Local plan policy R1 is most relevant to this type of development. Significant weight should be given to the economic implications particularly the number of farmers in the locality which rely on the livestock movement services to take their livestock to the relevant local and national outlets.
- Policy T1 relates to the transport network and it is necessary to understand how agricultural livestock haulage has been affected by recent changes in Legislation and Assurance requirements. Sustainable livestock movements are key to supporting farmers in the area.
- This proposal is considered appropriate development for the Green Belt and has significant economic benefits to the rural communities. In the planning balance, this development should be supported in Policy terms.

4.0 PROPOSED LIVESTOCK BUILDING

- Consideration has been given in relation the access and siting requirements which are required to meet the biosecurity, statutory and assurance standards of this collection centre.
- Various siting options have been considered within the applicants land ownership. Access into Windcote Lane is restricted and therefore consideration has been given to the installation of a new access from Whitehurst Lane. A pre-application meeting carried out with Staffordshire County Council Highways and a copy of the pre-application correspondence has been included in this application.
- Whilst a location immediately adjacent to Whitehurst Lane would minimise the length of access track, this was discounted for a number of reasons. Firstly, the topography of the land and minimal screening along the roadside results in the building being more visible, particularly from the East. The building would also appear detached from the existing buildings cluster. In addition, having an accessible roadside location did raise potential security concerns. Livestock are valuable animals and the industry is continually being targeted by thieves who will steal livestock from fields and farmsteads. Therefore, for the reasons outlined above, this location was discounted.
- The preferred site (as shown on plan 13863-01) benefits from existing screening and topography of the land. The existing hedgerow immediately East of the proposed building will largely screen any views of the building from the roadside, particularly during the Spring and Summer. To the West, there is a further hedgerow which can also be maintained at a height. The approximate height and

location of the hedgerows in relation to the proposed building is illustrated on the Section Plan 13863-004.

- The management of both hedgerows can be controlled by planning condition and the applicant is happy to maintain hedgerow at a suitable height to mitigate the building's impact.
- The proposed livestock building has been designed to provide suitable housing standards for the livestock. The building will be divided internally into 10 pens with a loading/ unloading dock on the end gable. A fully enclosed building is required to comply with the Assurance standards, particularly in relation to biosecurity and disease control from wildlife sources.
- A new 'highways compliant' access is proposed onto Whitehurst Lane. A cattle grid is proposed so that the roadside paddock can be used for grazing purposes without the need to subdivide the paddock (as with a gated entrance). A limestone access track is proposed across the existing field to the livestock building with a yard area to provide a turning area and allow livestock to be loaded / unloaded at the proposed building.
- The proposed livestock building will be used solely for the applicants business and will not be used by farmers as a 'drop off' centre. This allows the applicant to retain complete control of the buildings use and vehicle movements associated with this use. On a typical day, there will be 3-5 lorry movement to and from the livestock building.
- The application site benefits from a large amount of existing screening which will be maintained and supplementary planted as required. The maintenance of these hedgerows can be controlled by a suitably worded planning condition.
- Livestock housing is typically located in the countryside and therefore considering the proximity of any residential properties which are not associated with the applicants business, there are not considered to be any amenity issues with this scheme.

5.0 CONCLUSION

- Recent changes in the national statutory and assurance standards in relation to the movement and transfer of livestock have changed. Therefore the industry must adapt to these changes in order for the sector to continue to operate.
- If the business is unable to adapt to these changes, this would inevitably have financial implications to the applicants business and the knock on effect of increasing haulage costs to farmers.
- On balance, the proposal is considered to be supported in policy terms with reference to both National and Local Planning policies and is an agricultural exception for development which is permitted in the Green Belt location.
- Careful consideration has been given to the siting, design, size and access to the proposed livestock building. Appropriate siting and landscaping around the proposed building will mitigate the impact of the proposed building.
- Small scale, essential agricultural development such as this which allows a business that serves a large number of farmers in the area and to adapt to statutory and assurance standards changes. Approval of this scheme will allow an existing enterprise to continue to operate on a sustainable basis.

APPENDIX I – RED TRACTOR ASSURANCE – GUIDANCE NOTE FOR LIVESTOCK FARMERS AND HAULIERS



IMPROVING THE EFFICIENCY OF LIVESTOCK JOURNEY'S AND DEALING WITH DIFFICULT FARM ACCESS

A number of practical and commercial issues face the UK livestock industry which may result in farmers and hauliers unwittingly breaking the law and assurance scheme requirements. This guidance note provides tips to help you avoid common pitfalls.

CHALLENGES :

- Large livestock vehicles can't access many remote livestock farms or some on-farm loading pens
- Livestock journey lengths often need to be minimised to improve efficiency

ASSURANCE RULES:

All assured livestock must be transported and handled in accordance with legislation¹ **and** must be transported from an assured farm either:

- in the farmers own trailer/ lorry that has been assessed as part of the farm assurance scheme
- or by a vehicle assured as part of a commercial Livestock Transport Assurance Scheme²

Any site, (whether a farm, market or hauliers premises) used to bring livestock together for onward consignment must be assured under the Red Tractor Assurance Livestock Market and Collection Centre Scheme.

WHAT NOT TO DO:

- X **Do not** tailgate on a public road or in a layby adjacent to a public road. This is illegal and there are serious disease and safety concerns by doing this.
- X **Do not** use non licensed collection centres. These sites are operating illegally, they cut corners and do not record and report movements – these practices jeopardise the ability to efficiently deal with a disease outbreak.
- X **Do not** use non-assured collection centres as they operate outside of the assurance scheme requirements. Any assured livestock passing through them will lose their assurance status and cannot be slaughtered as assured.



SOLUTION TO THE CHALLENGES:

If access to farm facilities by lorries is limited you could either:

- ✓ Tail gate **only within** the farm boundary but this must be done:
 - Using trailers / vehicles cleansed and disinfected since last use
 - Transfer within the farm boundary and when parked on a hard standing surface
 - Drop the trailer tailgate onto the tailgate of the collecting vehicle – the animals **must not** run on the ground and the transfer must be done safely; ramp-angles must be legally compliant
 - Make the transfer secure using hurdles/ barriers/ gates
- ✓ Or use assured smaller lorries/trailers to take livestock to an assured **and** AHVLA licensed collection centre, where they are loaded onto a larger vehicle for an onward journey.

MORE INFORMATION:

- To license a collection centre speak to your local AHVLA office³
- To discuss how to get a collection centre assured contact Red Tractor Assurance on 02476 478630

¹ The Transport of Animals (Cleansing and Disinfection) Order, Animal Gatherings Order & Welfare of Animals in Transport Order (all as amended) (Devolved region specific)

² Red Tractor Assurance for Livestock Transport Scheme (formerly the ABM/ABP Transport Scheme) or the Quality Meat Scotland Haulage Assurance Scheme

³ Visit <http://ahvla.defra.gov.uk/postcode/index.asp> to find your local AHVLA office