

**Application Ref: NP/21/0399/FUL**

<b>Case Officer</b>	Rob James		
<b>Applicant</b>	REEF Ltd		
<b>Agent</b>	Mr Geraint John, Geraint John Planning		
<b>Proposal</b>	The retrospective construction of a livestock barn and works to / related to a silage clamp to support functioning of the working farm		
<b>Site Location</b>	Land opposite Middle Broadmoor, Talbenny, Haverfordwest, Pembrokeshire, SA62 3XD		
<b>Grid Ref</b>			
<b>Date Valid</b>	23-Jun-2021	<b>Target Date</b>	17-Aug-2021

This application is referred to the Development Management Committee at the request of Councilor Peter Morgan and has been the subject of a committee site visit

**Consultee Response**

**The Havens Community Council:** Objection and the following comment were provided:-

'Objecting: Responses requested via email (no meeting in August. Community Councillors responded 2- supporting, 5 x not supporting, 1 x no clear decision. Not supporting comments - Complaints received from neighbours, Access is causing problems, this needs to be looked in to further; Unhappy with retrospective applications; supporting comments: both are far enough away from Middle Broadmoor.'

**PCC - Transportation & Environment:** No Objection

**Natural Resources Wales:** Initial objection following submission of a Landscaping Scheme by the applicants NRW now approve.

**PCC - Drainage Engineers:** Conditional Consent - SAB Approval required

**PCNPA Planning Ecologist:** No objection subject to condition

**PCC - Public Protection:** No Objection

**Agricultural Advisor (Carmarthen CC):** No Objection providing all other regulations are met.

**Public Response**

A site notice and neighbour notification letters were posted in accordance with requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. A neighbour objection has been received via a planning agent and directly via email. The issues raised will be considered within the report they can be summarised as objections to the siting of the barn close to there holiday camping business. Objections to the increase in agricultural traffic servicing the sheds and silage pits. Objections to the noise of the agricultural equipment. 14 (4 from the same house hold) members of the public have also objected to the development all are visitors to the camp site located at Middle Broadmoor Farm and all object to the visual impact of the shed, noise from the farm traffic and animals including smell and highway safety grounds.

A further objection has been made from a resident of Talbenny objecting to the increase in farm traffic during busy periods and the danger this poses to other road

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users. also that the increase in noise and farm, traffic is having an adverse effect on the local tourism industry.

### **Policies considered**

Please note that these policies can be viewed on the Policies page Pembrokeshire Coast National Park website –

[Local Development Plan 2 - Pembrokeshire Coast National Park](#)

LDP2 Policy 01 - National Park Purposes and Duty

LDP2 Policy 07 - Countryside

LDP2 Policy 08 - Special Qualities

LDP2 Policy 09 - Light Pollution

LDP2 Policy 11 - Nationally Protected Sites and Species

LDP2 Policy 14 - Conservation of the Pembrokeshire Coast National Park

LDP2 Policy 29 - Sustainable Design

LDP2 Policy 30 - Amenity

LDP2 Policy 32 - Surface Water Drainage

LDP2 Policy 60 - Impacts of Traffic

PPW11

SPG05 - Planning Obligations

TAN 05 - Nature Conservation and Planning

TAN 06 - Planning for Sustainable Rural Communities

TAN 12 - Design

### **Constraints**

Biodiversity Issue

Safeguarding Zone

Hazardous Zones

Potential for surface water flooding

### **Officer's Appraisal**

#### **Site and Context**

The application has two red line boundary sites. Both sites are situated within the Blue line boundary of an existing farm complex at Lower Broadmoor Farm. The sites are located adjacent to an unclassified road which terminates at Lower Broadmoor Farm. The road services two further properties; Upper Broadmoor Farm and Middle Broadmoor which is directly opposite one of the application sites. The farm comprises of a range of modern farm buildings, silage pits and covered slurry store and milking parlour. The host farmhouse is located at the end of the access road. Lower Broadmoor Farm extends to circa 800 acres with a herd of approximately 420 dairy cows and 120 followers.

#### **Relevant Planning History**

No relevant Planning History

## **Description of Proposal**

Planning permission is sought to regularise; the retrospective construction of a livestock barn and works to / related to a silage clamp to support functioning of the working farm. The application consists of two development sites Site A is located on a disused Airfield and comprises of 2 x Silage pits constructed on an existing concrete hardstanding formally used as a runway. Site B is an open fronted livestock building located opposite Middle Broadmoor and has been constructed on a previously developed site with smaller disused buildings in a state of disrepair.

## **Key Issues**

The application raises the following planning matters

- Policy and Principle of Development
- Siting, Design and Impact upon the Special Qualities of the National Park
- Amenity and Privacy
- Highways
- Biodiversity
- Land Drainage

### *Policy and Principle of Development:*

Planning Policy Wales (Edition 11) (February 2021) states in paragraph 5.6.8 that local planning authorities should adopt a constructive approach toward agricultural development proposals, especially those which are designed to meet the needs of changing farming practices or are necessary to achieve compliance with new environmental, hygiene or welfare legislation.

This application seeks retrospective consent for a silage pit and livestock shed on two separate sites accessed off the unclassified access road. The silage pit and shed are required to support the functioning of the farming business at Lower Broadmoor Farm. The shed and silage pit have been located away from the main complex of farm buildings so as to provide young stock a degree of separation from the main herd to help with the spread of TB. Consultation response received from the Agricultural Advisor at Carmarthenshire County Council has confirmed that "The justification put forward is that this location remote from the main farm complex is required due to meet Bovine TB requirements. However, the land is farmed as one with the main holding and although the young stock housed here are approximately half a mile from the main dairy herd, they would still be considered as part of that herd for TB purposes. The main herd are understood to be under TB restrictions at present and therefore so are the youngstock in the new barn. The barn is also primarily used for holding herd replacements although some beef cattle were also present. The shed is not justified purely TB management grounds.

Irrespective of the TB regulations the chosen site away from the main farm complex has a number of practical considerations in its favour. The site has an existing surfaced yard area, is remote from other properties and enables good stock

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management in a separate but not distant location. Having inspected the main farm complex which is comprehensively developed it is concluded that the subject building would not have been readily constructed there. Its location serves a functional, practical purpose within the farm management and therefore its location is deemed acceptable".

Officers consider that the proposed development can be supported in principle and that it complies with Policy 7 of the LDP2.

### *Siting, Design and Impact upon the Special Qualities of the National Park:*

Technical Advice Note 6 advises (in relation to design, appearance and siting) that the scale, form and siting of new agricultural buildings are usually influenced by the operational needs of the enterprise, the standardisation of modern agricultural buildings and economic considerations. It continues that it should be possible to reconcile proposals for development with the need to conserve and wherever possible enhance the landscape.

Paragraph 5.8.5 of Technical Advice Note 12 states that the scale, form and siting of new agricultural buildings is usually influenced by the operational needs of the enterprise and care should be taken with siting, massing and detailed design to enable buildings to fit within the landscape, taking into account the use of materials, colour and detailing.

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan (LDP2) is a strategic policy which refers to the special qualities of the National Park and lists priorities to ensure that these special qualities will be protected and enhanced. LDP Policy 9 seeks to control significant levels of lighting within the National Park and development will only be permitted where the lighting proposed relates to its purpose; and where there is not a significant adverse effect on the character of the area, local residents, vehicle users, pedestrians and the visibility of the night sky. Policy 14 of the LDP seeks the conservation of the Pembrokeshire Coast National Park with criteria 'a' and 'b' resisting development that would cause significant visual intrusion and/or, that would be insensitively and unsympathetically sited within the landscape. Criteria 'd' and 'e' resists development that would fail to harmonise with or enhance the landform and landscape character of the National Park, and/or fail to incorporate important traditional features.

Preference should be given to new buildings which sit within or are well related to existing building complexes, since the existing development can help to provide a context which is less intrusive than new isolated development. However, it is recognised that such siting is not always appropriate, for operational, pollution control or other practical reasons.

The proposed building has been sited away from the existing farmstead This shed is stated within the application to house the farms young stock. The sites chosen are situated on previously developed land, Site A was once a former World War 2 aerodrome, and the silage pit utilises the existing concrete runway. Site B situated opposite Middle Broadmoor has an open fronted steel portal frame livestock building measuring 64.15m long x 13.8m wide x 4.3m to the eaves and 6.4m to the ridge.

The shed has an open front elevation with feed passage and timber boarding to all other elevations. The building is predominantly screened from the wider area by an existing hedge bank and existing trees/scrub running along the road boundary. However, the shed is visible at a distance from the PCNP Coast Path and is situated on the skyline so is visible from the wider landscape. NRW has been consulted and gave the following responses to the siting of the agricultural buildings

*Scattered farmsteads are a feature of the landscape and the three historic farms at Broadmoor are located on lower ground close to streams and woodland, with trees and hedgerows providing some shelter to the buildings. The large, modern barns at Lower Broadmoor are at a lower elevation than the proposed and more closely associated with the stream and woodland. By contrast, the two sites are much more elevated and exposed, and do not relate well to the historic pattern. The building would potentially be seen on the skyline in views from nearby lanes, although no photographs illustrating views have been provided. The barn is a standard modern farm building, clad in timber board and concrete, with a fibre cement roof, the clamp would be constructed in concrete walls 3m high. Although typical of modern farm buildings, they are not sensitively design or locally distinctive. Derelict farm buildings existed on the barn site and hardstanding from the disused airfield remain on the silage clamp site. However, we do not consider that the proposals enhance either site, since they introduce larger buildings and structures and provide no mitigation.*

Whilst the development in its current form does have some adverse impacts on the landscape character of the area , it is considered that there are options to mitigate the visual impact and to conserve and enhance the landscape, this would include substantial planting schemes at both sites in order to integrate with the nearby hedgerows, trees and scrub and/or grouping the developments together with a substantial, integrating planting scheme this would have additional ecological benefits. The PCNP Sustainable Design and Development Supplementary Planning Guidance, referred to in the Design and Access Statement (by Geraint John Planning, dated 17 June 2021), provides useful guidance for agricultural buildings, including integrating with new native planting, using dark colours and non-reflective materials for roofs, minimising lighting, form and materials in buildings. This guidance should be used to inform the proposals.

Following submission of a planting scheme NRW has been re-consulted and gave no objection to the proposal and supported the Landscaping Scheme. The plans will be referenced within Condition 2 to ensure they are enforceable.

Whilst no external lighting is shown on the submitted drawings and given that there may be a need to provide lighting, this could result in light spillage from the proposed development having a significant visual intrusion into the night sky. In order to avoid any unnecessary light spillage a planning condition will be imposed to ensure that a light mitigation strategy is submitted and approved prior to the erection of any external lighting. This will help to minimise any potential light spillage from the proposed development whilst ensuring that the site is safe for staff to carry out their duties during the night-time.

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A neighbour objection has been received via a planning agent and 11 public objections have been received from visitors to the camping site located at Middle Broadmoor. The objections are largely based on the increase of traffic and the associated noise resulting from agricultural machinery. Objections have been made as to the siting of the shed within 80 meters of the neighbouring property's entrance and 200m from their main dwelling house.

The site is separated from its neighbour by the highway, mature hedging and is set back from the boundary of the highway. The shed is not visible from the entrance of Middle Broadmoor or from the dwelling house. It is considered that the operational needs of the farm necessitate the siting of the barn at this location and subject to implementation of the Landscape Management Plan it is appropriately sited within the landscape. To further protect the existing landscape a condition will be recommended to submit to the authority within 3 months a detailed landscape management plan including additional screening to further incorporate the building and silage pits within the landscape.

The proposed development is considered to comply with Policies 8, 9, 14 and 29 of the LDP.

### *Amenity and Privacy:*

Policy 30 of the LDP seeks to avoid development that is of an incompatible scale with its surroundings (criterion 'b') or is visually intrusive (criterion 'd').

Objections have been received from a neighbouring property objecting to the development stating that the shed and silage pit have a detrimental impact upon their camping business and the siting of the shed and silage pits are inappropriate.

Given the nature of proposed development and the nearest residential property, existing levels of privacy are not considered to be affected. In respect of amenity the use of the proposed building would not be inappropriate or incompatible to the existing agricultural and countryside setting. The nearest residential property is located to the South approximately 200 metres on the opposite side of the existing cattle housing building. PCC Public Protection Division has also been consulted with regard to the development and gave no objection to the development. Public protection comments are detailed below.

#### 1. Noise and odours from agricultural activity.

I have attached the Noise App for submissions to be made [for objectors to use in relation to noise complaints] but in relation to machinery for agricultural activity there would be very little actions possible considering the nature of the location as wholly rural/agricultural industrial landscape. Bird scarers could be actioned for nuisance if found to be exceeding relevant guidance of four events per hour. House fly's always an issue and difficult to identify a source and again countryside locations will naturally have large numbers of insects which will enter buildings/property to escape adverse weather conditions and/or will be present in large numbers during the summer months. Odours can be assessed by a site visit but again not uncommon

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around agricultural businesses and would have to be significant to pose a nuisance, dead carcasses etc.

2. Risk assessment for TB housing and transfer to public. I have attached Govt advice in relation to TB transmission. It does not appear to support the concerns raised.

3. Storage of silage. Natural Resources Wales are the relevant authority to assess silage clamps and legislative compliance and they appear to have been consulted in relation to this application.

The shed will be predominantly occupied from late autumn throughout the winter and to a lesser extent from late spring though out the summer. The shed is used all year round for storage of machinery and livestock when necessary. Whilst the development undoubtedly has an effect on the neighbouring campsite, it should be noted that all relevant consultees have been consulted and have given no objection or in the case of NRW have requested a landscaping condition to mitigate the landscape issues. It is considered that the shed subject to the recommended conditions is appropriate.

Notwithstanding the objections received the proposed development is considered to comply with policy 30 of the LDP.

### *Highways:*

Objections have been received from The Havens Community Council, Neighbours and 11 x members of the public regarding the traffic generated by the development. Increased traffic servicing the shed and silage pit is generating excessive noise and danger on the narrow unclassified road.

PCC's Highways Officer has been consulted and stated:

*The two accesses used are well established and both probably part of the old airfield. They have wide enough entrances with suitable visibility for the Road without further improvements being needed. There is good space for turning at each building. The gates are set back, and clearly at times these entrances are used as added passing places on the Road. There is evidence of large amounts of silage bales being stored (Google images from 2009 & 2011) where the new silage clamp will go, and of buildings used for farm purposes where the new cattle shed is now built. These accesses and the Unclassified Road were used as the route to extract concrete from broken up runways, and improvements were made to the Road surface and passing places then. The Unclassified Road is marked as a No Through Road as it becomes a narrow "Green Lane" beyond the sharp bend at the Lower Broadmoor Farmhouse. It is not known where the satellite farms in the Rees Ltd Farm business are, and the overall operation of the linked farms business is not relevant to the access to the buildings applied for. It is noted from a site visit that the Rees Ltd have erected some speed advice signs as a way of reminding drivers to be careful and to help allay concerns being expressed about the safety for holiday makers. There is not a Highway Authority objection to where these signs are located.*

RESPONSE I have no objections on highway grounds to the plans as submitted.

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Notwithstanding the objections received the application is considered to be in accordance with the criteria set out in Policy 60 Impacts of Traffic.

### *Biodiversity*

PPW, TAN5 and LDP policy 11 requires biodiversity and landscape considerations to be taken into account in determining individual applications.

To comply with Planning Policy Wales (2021) and the Environment (Wales) Act 2016 planning authorities are expected to ensure every development positively contributes to biodiversity.

Both NRW and PCC's Ecologist have been consulted and no adverse comments have been received in respect of the proposed development.

The PCNPA Planning Ecologist has recommended a Lighting Condition to control light spill into the wider landscape also stating that the Landscape mitigation scheme will enhance the local biodiversity in the area. Subject to the inclusion of this condition the application is considered to conform with the relevant requirements of PPW, TAN5 and policy 11 of the LDP.

### *Land Drainage*

The planning application states that surface water will be disposed of to a soakaway. As from 7th January 2019 all new developments of more than 1 property or where the construction area that has drainage implications is 100 square metres or more, will require sustainable drainage systems (SuDS) for surface water. The SuDS must be designed and built-in accordance with Statutory SuDS Standards published by the Welsh Ministers and SuDS Schemes must be approved by the local authority (Pembrokeshire County Council) acting in its SuDS Approving Body (SAB) role, before construction works begins. PCC's Drainage Engineers have been consulted and as the construction area of the proposed development exceeds 100 square metres, SAB approval will be required from PCC. An informative to this affect shall be included in the decision notice to notify the applicant as such.

## **Conclusion**

Notwithstanding the objections raised, on balance the development is considered justified and necessary to aid the running of the farm holding and it is considered that the impacts of the buildings upon the wider landscape can be mitigated against with appropriate landscaping condition. The development therefore complies with the policies 1, 7, 8, 9, 11, 14, 29, 30, 32 and 60 of the adopted LDP and is recommended for approval subject to appropriate conditions.

## **Recommendation**

APPROVE, subject to the following conditions:

1. The development shall begin not later than five years from the date of this decision.

**Reason:** Required to be imposed pursuant to Section 91 (1) of the Town and Country Planning Act 1990 (as amended).



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2. The development shall be carried out in accordance with the following approved plans and documents:

Location Plan Ref MBK\_Work\_21\_001dwg.

Floor Plan and Elevations Cattle Building. Ref MBK\_Work\_21\_004dwg.

Floor Plan and Elevations Silage Clamp. Ref MBK\_Work\_21\_005dwg.

Site Plan Silage Clamps Ref Ref MBK\_Work\_21\_003dwg.

Site Plan Cattle Building Ref MBK\_Work\_21\_002dwg.

Floor Plan & Diagram of Internal Construction (received 15/04/2019)

**Reason:** In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

3. Prior to the erection of any external lighting on the approved site a light mitigation strategy, including measures to reduce light spillage shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

**Reason:** To ensure that animal and plant species and habitats listed under the Conservation of Habitats and Species Regulations 2010 are adequately protected, and to protect and enhance the character and appearance of the site and its setting within the Pembrokeshire Coast National Park. Policy: Local Development Plan - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 9 (Light Pollution), 11 (Protection of Biodiversity) and 15 (Conservation of the Pembrokeshire Coast National Park).

4. Within 3 months of the date of this permission a landscaping scheme shall be submitted to the Local Planning Authority and approved in writing. The scheme shall include details of planting, timescale, future maintenance and details of replacement landscaping should any of the planting fail. The scheme shall be implemented as approved and maintained in perpetuity.

**Reason:** To protect the Special Qualities of the National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty); 14 (Conservation of the Pembrokeshire Coast National Park); and 30 (Amenity).

5. Within 3 months of this decision a scheme for biodiversity enhancement shall be submitted to and approved in writing by the local planning authority. The scheme shall include details of implementation and shall be implemented and retained as approved.

**Reason:** To secure biodiversity enhancement. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty); 11 (Nationally Protected Sites and Species); 12 (Local Areas of Nature Conservation or Sites of Geological Interest); 9 (Light Pollution); and 14 (Conservation of the Pembrokeshire Coast National Park).

6. The landscaping works shall be carried out in accordance with [the approved details during the first planting season immediately following occupation of the development.

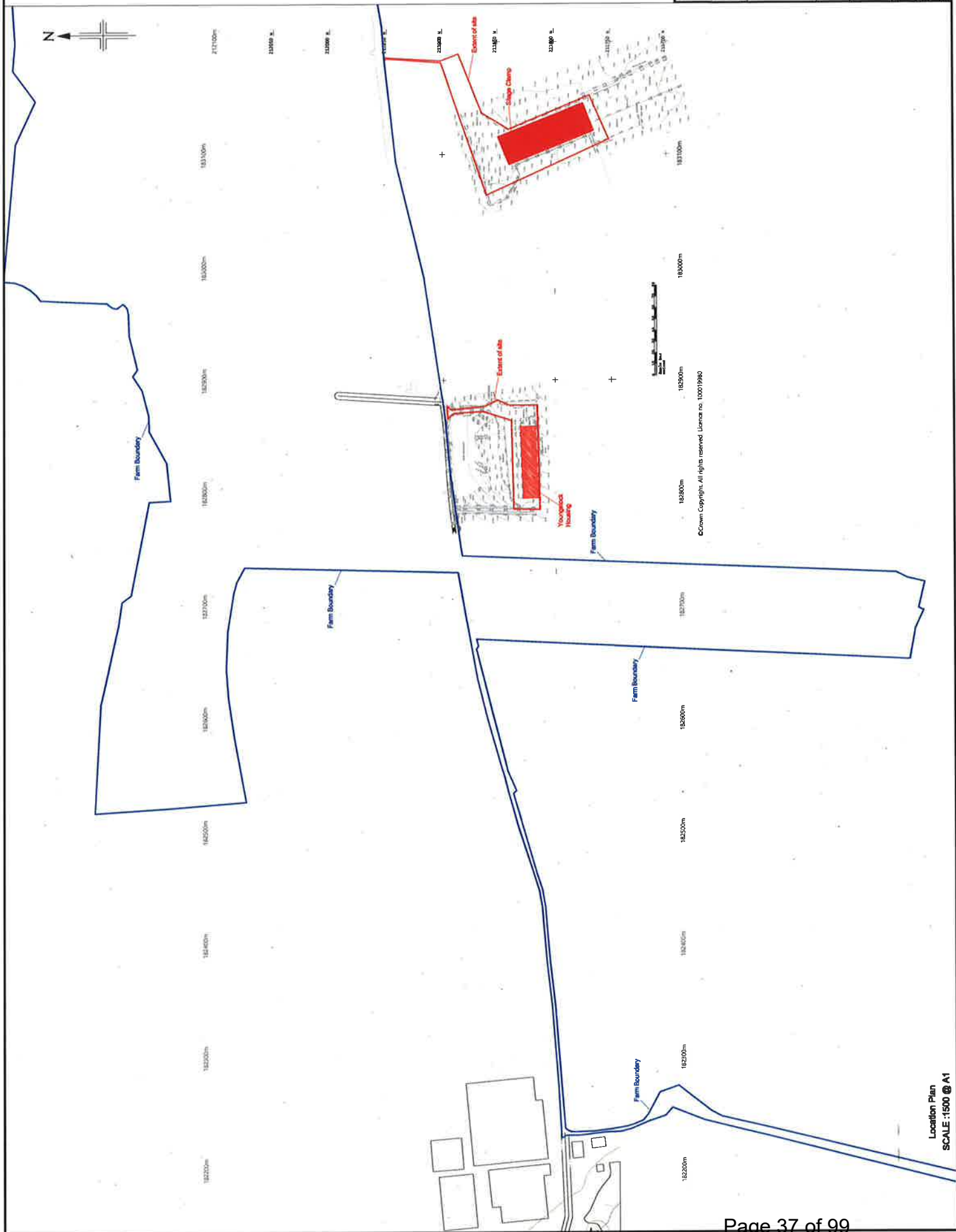
**Reason:** In the interest of protecting visual amenity and the special qualities

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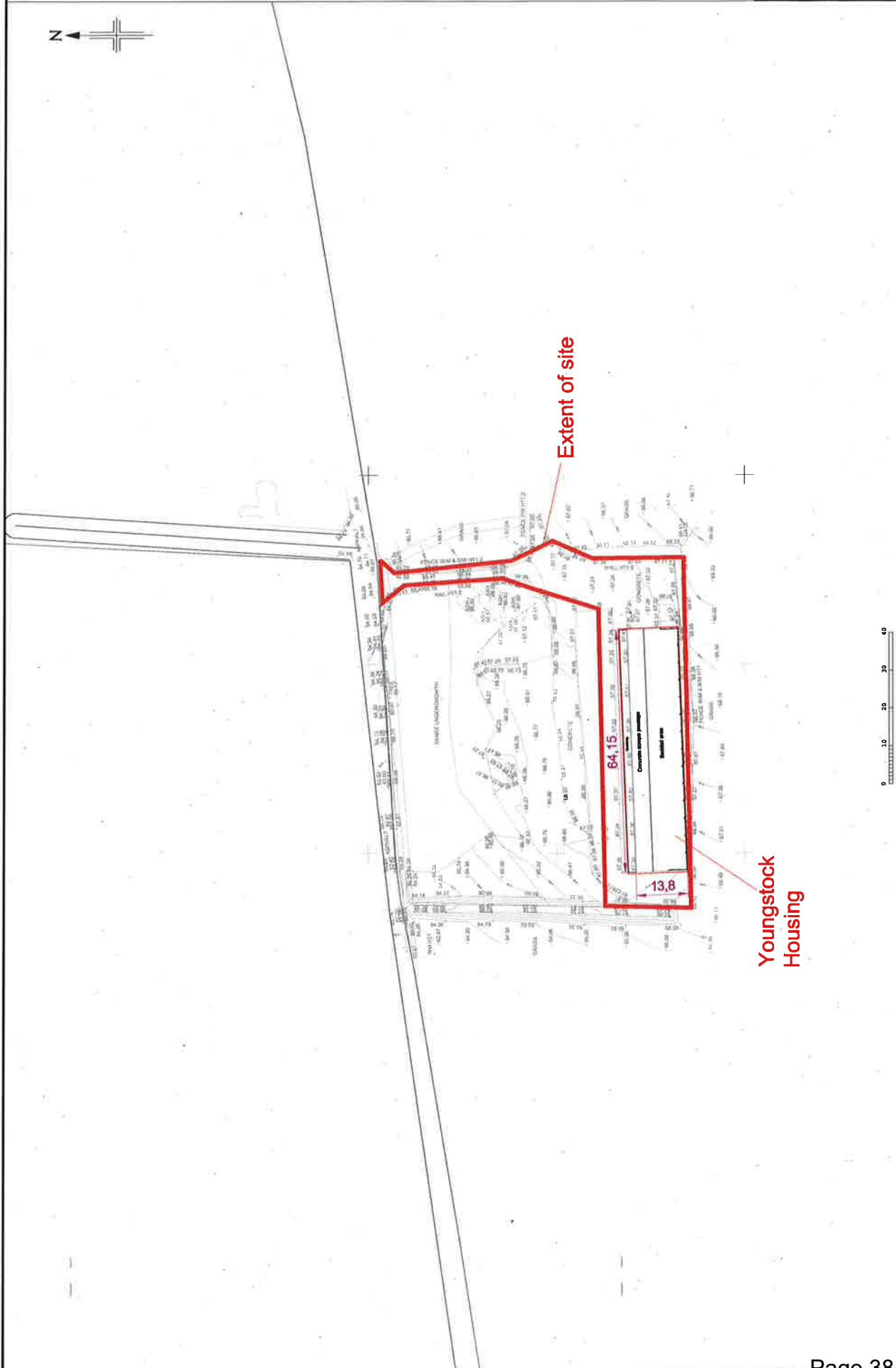
of the area. Policy: Local Development Plan 2 - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 12 (Local Areas of Nature Conservation or Sites of Geological Interest) , 14 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).

7. If within a period of 5 years from the date of the planting of any tree or hedging proposed as part of the landscaping scheme , or any tree planted in replacement of it, is removed, uprooted or destroyed or dies or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place during the next planting season immediately following the death/removal/destruction of that tree.

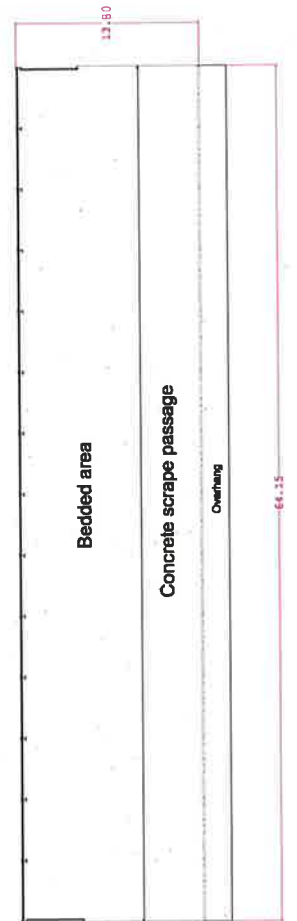
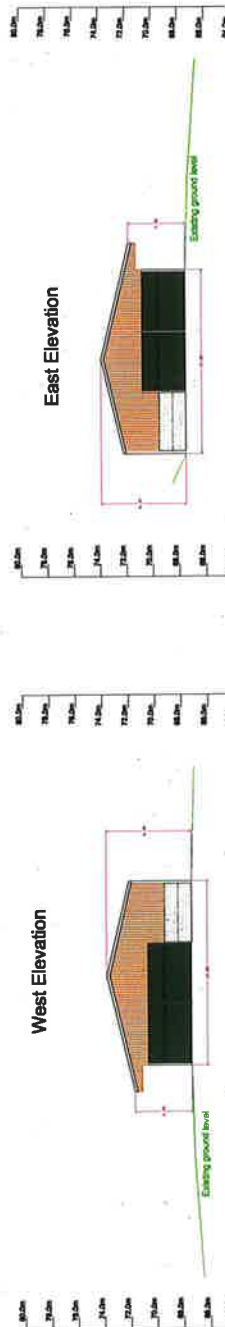
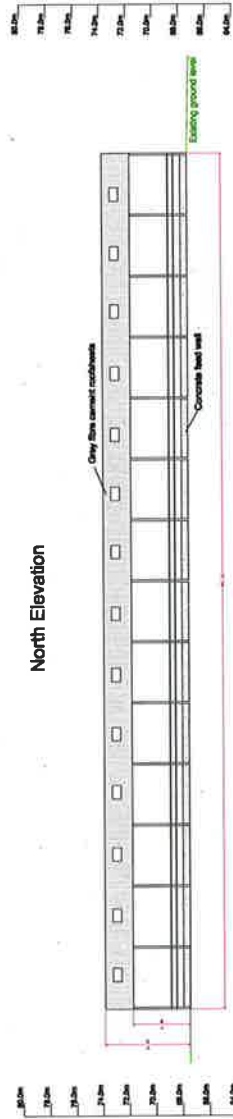
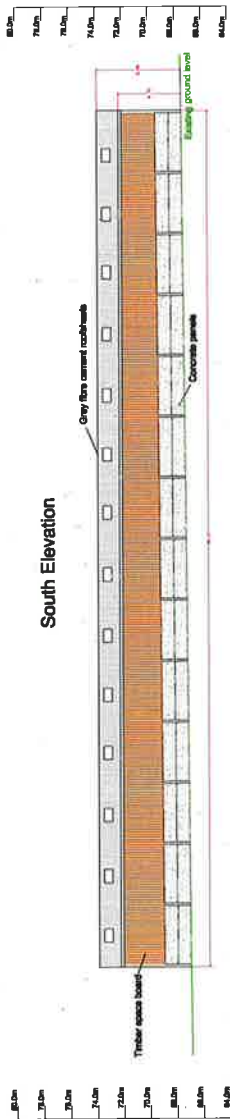
**Reason:** To prevent detrimental impact to trees, hedges and other landscape features which contribute to the amenity, landscape & biodiversity of the site and surrounding area. Policy: Local Development Plan 2 - Policies: 1 (National Park Purposes and Duty), 8 (Special Qualities), 12 (Local Areas of Nature Conservation or Sites of Geological Interest), 14 (Conservation of the Pembrokeshire Coast National Park), and 30 (Amenity).



<p>NOTES</p> <p>Do Not Scale. No Accuracy can be Guaranteed</p> <p>Due to Printing and Copy Variations</p> <p>As the map is a reproduction of the original</p> <p>It is not intended to be used for legal purposes</p> <p>Site Measurements should be taken for Confirmation</p>	
<p>Customer: Survey Datum and Grid</p> <p>Contract: Mr T McKendrick</p> <p>The Dairy Group Ltd</p> <p>New Agriculture House</p> <p>Blackbrook Park Avenue</p> <p>Warrington</p> <p>Cheshire</p> <p>Email: <a href="mailto:info@dairygroup.co.uk">info@dairygroup.co.uk</a></p>	<p>Client:</p> <p>R E Evans Farms Ltd</p> <p>Lower Broadmoor Farm</p> <p>Talbenny</p> <p>Haverfordwest</p> <p>SA62 3XD</p> <p>Location Plan</p>
<p>Scale: 1:500</p> <p>Map: 1:500</p> <p>Sheet: 1 of 1</p> <p>Project: 100019960</p> <p>Drawn: 10/01/2000</p> <p>Checked: 10/01/2000</p> <p>Author: 10/01/2000</p> <p>Revised: 10/01/2000</p>	<p>Location Plan</p> <p>SCALE: 1:500 @ A1</p>







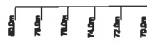
40718  
Do Not Scale. No Accuracy can be Guaranteed  
Due to Printing and Copy Variations  
This Drawing is to be used for Construction  
To Any Design or Fabrication  
Site Measurements should be taken for Confirmation

Customer: Survey Design and Build  
Consultant: Mr T McKendrick  
The Dairy Group Ltd  
Near Agriculture House  
Blackwood Park Avenue  
Llanelli  
SA11 2PX  
Email: [enquiries@the-dairygroup.co.uk](mailto:enquiries@the-dairygroup.co.uk)

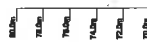
Client: R E Evans Farms Ltd  
Lower Broadmoor Farm  
Talbeny  
Haverfordwest  
SA62 3XD

Project Title: Floor Plan & Elevations Cattle Building

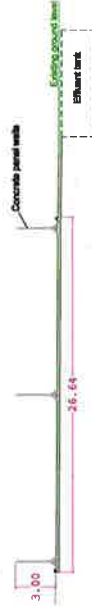
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Scale: 1:200  
Date: 10/01/2020  
Drawn by: J. Jones  
Checked by: J. Jones  
Approved by: J. Jones



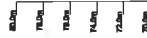
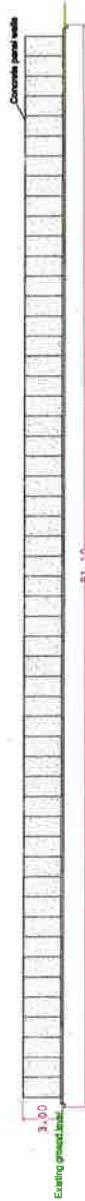
South East elevation



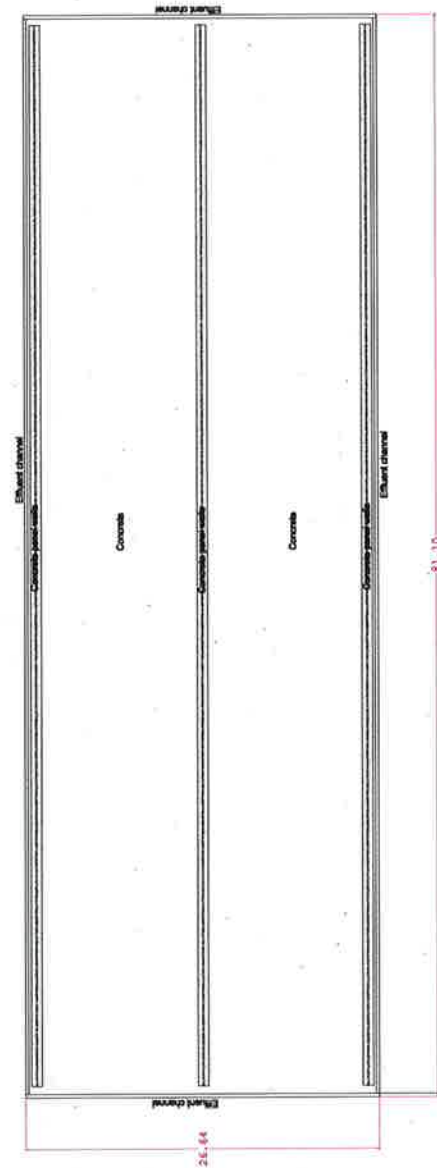
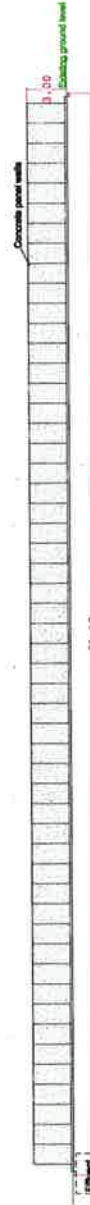
North west elevation



North east elevation



South west elevation



**NOTES**  
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To Any Design or Fabrication  
Site Measurements should be taken for Confirmation

**Consultant**  
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Email: [tmckendrick@thedairygroup.co.uk](mailto:tmckendrick@thedairygroup.co.uk)

**Client**  
R E Evans Farms Ltd  
Lower Broadmoor Farm  
Talbeny  
Haverfordwest  
SA62 3XD

**Project**  
Floor Plan & Elevations - Stage Clamp

**Scale**  
1:200

**Drawn**  
A11

**Check**  
A11

**Date**  
10/06/2019

**Rev**  
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**Project**  
10/06/2019