

Item 5 - Report on Planning Applications

Application Ref: NP/14/0311

Application Type	Full
Grid Ref:	SM89153600
Applicant	Mr D Harries
Agent	Mr A Lawrence, Reading Agricultural Consultants
Proposal	Proposed cattle accommodation building, associated yard area & slurry lagoon
Site Location	Velindre, St Nicholas, Goodwick, Pembrokeshire, SA64 0LJ
Case Officer	Liam Jones

Summary

The application is reported to the Development Management Committee as it is a Major Development application.

The application proposes the erection of a cattle accommodation building with associated yard and the construction of a slurry lagoon. The proposed development would allow the farm to expand its milking operation from 540 upto 860 milking cows.

Although offering the economic benefit of one additional full time role and enhanced output at the farm the intensive nature of development is considered to represent an inappropriate and harmful industrial form of development on land within the open countryside within the National Park. The proposed development by reason of its very form, character and scale will erode the special qualities of the National Park and will not be compatible with the strategic aims of conserving or enhancing the natural beauty, wildlife and cultural heritage of the Park, and the public understanding and enjoyment of those qualities.

The cattle accommodation building and slurry lagoon will expand the site's visibility and result in an unacceptable loss of a sense of remoteness and tranquillity, will not protect the pattern and diversity of the landscape, will be insensitively and unsympathetically sited within the landscape, will introduce and intensify a use which is incompatible with its location, and will fail to harmonise with or enhance the landform and landscape character of the National Park. In addition to these concerns the slurry lagoon by virtue of its form, scale and siting will have an adverse impact upon the amenities of neighbouring occupiers and visitors to the area due to the development consisting of a use inappropriate for where people live and visit, being of a scale incompatible with its surroundings and being visually intrusive.

If planning permission were to be granted for the scheme in the face of this conflict, the harm would need to be clearly outweighed by other material considerations, as explained in S38 (6) of the Planning and Compulsory Purchase Act 2004. There are advantages to the proposal that weigh in favour of the grant of planning permission and these advantages include the fact that the proposed development would create additional employment, both

Item 5 - Report on Planning Applications

permanently on the farm, and during the temporary construction phase. However, the benefits of the scheme are considered to be far outweighed by the harm to the special qualities of the National Park in this instance.

In summary it is concluded that the development fails to comply with the requirements of policies 1, 8, 15, 29 and 30 of the Pembrokeshire Coast National Park Local Development Plan and National Policy in the form of Planning Policy Wales (Edition 7, July 2014) and is recommended for refusal.

Consultee Response

Pencaer Community Council: No comment - Due to declarations of personal and prejudicial interest from some councillors the Council was not quorate for this item of business on the agenda and were therefore unable to make any decision or comment.

Head of Corporate Property: No objection

Natural Resources Wales: No objection - We have considered the plans submitted in support of the above application and have no objections to the proposed development, however we do wish to make the following comments.

The new slurry lagoon must be designed to meet the requirements of The Water Resources (Control of Pollution) (Silage, Slurry and Agriculture Fuel Oil) (Wales) [SSAFO] Regulations 2010. The SSAFO Regulations 2010 require all installations to be constructed with a durability life of at least 20 years. Installations should not be constructed, silage must not be made, and silage, effluent, slurry or fuel oil must not be stored within 10 metres of any inland freshwater or coastal water. We must be informed in writing 14 days before bringing any new substantially altered or enlarged silage, slurry or agricultural fuel oil store into use. We note that it is intended to utilise a clay liner for the earth bank lagoon. We request that a copy of the clay content analysis is submitted for both our records and the planning file. Further information on the requirements of the SSAFO Regulations is contained in the Welsh Government's SSAFO Guidance Notes for Farmers. The minimum required slurry storage capacity under the SSAFO Regulations 2010 is 4 months. The farm will exceed this requirement and have six months capacity.

PCC - Ecologist: No objection - a desk top assessment has found that there is a low likelihood of protected species being found at the development site or that there would be any adverse impact on the habitat or species as a result of the development.

PCC - Transportation & Environment: No objection - subject to conditions

Access Officer: No objection - subject to informatives.

PCC - Head of Public Protection: No objection - The proposed lagoon has been designed to comply with the relevant legislation/guidance. The nearest receptors are approximately 260 metres from the lagoon. The large area of spreading available to the farm and the proposed increased storage capacity allows flexibility for the spreading operations. Heaps of solid material from the dairy operations will not be located within 200m of any potentially affected property.

Item 5 - Report on Planning Applications

Dyfed Archaeological Trust: No objection

National Trust: I write in relation to the proposed agricultural developments at Velindre Farm Nr St Nicholas. The National Trust owns and manages some 400 acres of land adjoining Velindre at Reseissyllt and Tregwynt, running down to Abermawr beach. The land is of very high landscape and conservation value and contributes greatly to the unspoilt character of the area. Having considered the application I would like to express concerns that the development will lead to an increase in the number and size of traffic movements on the roads due to the dispersed nature of the applicant's holding. In an area where minor roads with their high banks and narrow nature help define the character of the area, our concern would be that more regular movements of even larger agricultural vehicles will have an erosive effect on the natural aspects of this part of north Pembrokeshire, and the enjoyment of it by visitors and local people alike.

Public Response

The application was advertised in accordance with The Town and Country Planning (Development Management Procedure) Order 2012 by display of site notices initially on 20 June 2014. Following weather damage to the notices additional notices were placed at the site on 4 July 2014. Further to this the application was advertised in the local press on 20 June 2014 and letters of notification were sent to neighbouring occupiers on 20 June 2014.

The applicant submitted some additional information on 22 July 2014 which included plans showing alternative sites, pipeline routes, photomontages and a line of sight diagram. Letters of consultation were sent to neighbouring occupiers informing of the additional information. The applicant's agent was informed of a discrepancy on the drawing (scale noted as being 1:200 and not 1:500) and information in the submitted report noted an incorrect measurement of the lagoon which was corrected in details supplied on 1 August 2014. No further consultation was undertaken on this later correction due to no new or changed proposals being submitted and the relevant information was placed on the Part 1 public file on receipt of 1 August 2014 and was available for public inspection.

Up until production of this report on 18 August 2014:

7 No. letters of support have been received in support of the scheme whilst a petition was received on 15 August 2014. The petition is titled 'Pencaer Farmers', with the statement "*We the undersign support Pencaer Farmers in their endeavours to produce our food. We support the Harries Family at Velindre as we know they will do all they can to mitigate problems as they arise to the best of their ability*" and contains 218 signatures.

56 No. letters of objection have been received. Where a person has submitted more than one letter or email this has been counted as a single objection.

Item 5 - Report on Planning Applications

In terms of the letters of support and objections to the scheme received it is not possible to list or summarise all the individual letters of correspondence received. Full copies are, however, available for inspection on the planning application file. Notwithstanding this a selection of the both the support and concerns raised from third parties are as follows:

Letters of Support

- “I believe that the impact of a large slurry lagoon will not have a huge impact on the surrounding area. I believe that the improved containment of slurry will lesson the possibility of contamination to the local waterways. Having a large store will enable Mr Harries to time his spreading operation, to benefit local conditions. Slurry is a natural animal by-product and is a valuable source of fertilizer for farmers so that they can use less of the bagged product, that has to be hauled in from abroad. These days there are products that can be added to slurry which reduces the odour that so many people find offensive. We are keen for our young people to come back and live in Pembrokeshire and create business opportunities so that the county becomes more sustainable, we should be encouraging young entrepreneurs.”
- “The Harries family have owned and farmed at Velindre for 90 years, and during that time have had to expand and change with the economic times in order to stay viable as have most other farms and businesses. Their animal husbandry is excellent, being continually monitored by a local veterinary practice. The addition of a slurry lagoon will remove the likelihood of spills, and will be built and lined to an extremely high standard.”
- “The site appears to have been selected because it is: 1. The furthest possible distance away from any watercourse, with the lie of the land also providing a natural barrier to any potential escape of slurry. 2. Has been deliberately moved as far as possible away from the residents in St Nicholas, to minimise any potential nuisance. 3. Of such a size as to enable the farmer to spread slurry on his land when weather conditions permit, and when good husbandry demands. This will in turn reduce usage of artificial fertilizers, reduce any risk of run off (by having to spread in adverse weather conditions). 4. Placed in the centre of the farm, thereby reducing the need for tractors and slurry tankers having to travel on public roads to reach some parts of the farm.”
- “In the current era, economic pressures have forced businesses that produce milk to grow larger if they are to make a profit and a living for their family. Units of this type can provide a high standard of care for their animals as they can pay for the expertise available from veterinarians and whole food providers. Providing permanent shelter to most of the cattle may reduce the likelihood of a cattle acquiring an infection such as ticks in wild animals. Therefore reducing costs to the government and us the taxpayers.”

Item 5 - Report on Planning Applications

- “Providing a slurry pit which has been carefully planned out in the fields from the river is a significant improvement and will take away the risk of accidental spillage into the river near the existing slurry tank. This will also remove the existing system of spending long hours transporting the slurry nearly every week to stores and other farms.”
- I believe that this proposal, meets the requirements of the Minister for Natural Resources Wales to make agriculture more self-sufficient. The wall of the new pit will, very quickly be obscured by gorse and many other plants. Note from the significant lake half a mile or so from the site to the north of the application site, which is almost out of sight and shelter for many birds and so on. If there is weight to be placed on the applicant to take notice of the benefits of shooting the slurry into the land, instead of spreading it on the surface, I and many of the neighbours would appreciate the improvement”.
- “You will be aware that the farming industry continues to face formidable challenges with market volatility, high input prices and increasing regulation. In response to these challenges farmers have to grow and adapt their businesses so that they can remain viable. Our member is no exception; this proposal is required to meet the demands of a growing business. Since taking on the running of the farm from his father Mr Harries has grown the milking herd to its present herd size of 475 dairy cows and the plan is to further increase to 860 cows in the coming years. With this development Mr Harries has invested heavily in a modern and state of the art dairy unit which encompasses innovation and technology whilst ensuring the highest standards of animal welfare are maintained. Indeed I was privileged to recently visit the farm and see first-hand the standard of management and I must comment that the standards of animal management were amongst the best I have ever seen. My visit coincided with an open day and I must stress that the feedback I have received from the event and read of social media has been extremely complimentary.”
- “The development of this unit is reliant upon the need to ensure adequate slurry storage and as such the proposal for 14,800 cubic meter store will ensure 4 months storage for a 860 cow herd. The development of the slurry store will have additional benefits such as reducing levels of farm traffic (slurry tankers) on the road as slurry will be pumped directly to the land from the new store and will be placed further away from the nearest conurbation than the present arrangement.”
- “There are many reasons why it is essential that manures and slurries are returned to the land. Manure plays a key role in the physical, chemical and biological processes which underpin soil health. It builds fertility by providing a valuable source of organic nutrient which allows farmers to reduce their reliance on artificial fertilisers, thereby reducing the carbon footprint of food production. The return of the manure or slurry aids soil structure and provides habitat for valuable soil flora.”

Item 5 - Report on Planning Applications

Letters of objection

- “Pembrokeshire Coast! National Park!’ These words scream unspoilt countryside, fresh air, beaches, healthy living. An attraction for all! Residents and visitors do not want to smell and breath toxins from a ‘Slurry Lagoon’. The words alone make you feel nauseous. We are parents that want to protect our children and the environment matters! Visitors will not want to visit a place with this development therefore affecting business to holiday cottages. Traffic flow of HGV will inevitably grow therefore producing noise, extra pollution and dangerous driving conditions as narrow lanes are the main route”
- “We visit Pembrokeshire, staying near to the proposed development, every year. We come for the beauty of the landscape, its unspoilt wildness and its peaceful atmosphere. Of course, this is also a landscape in which people live and in which agriculture is practised and we have noted that these are largely in harmony with and complement rather than disturb the setting. We are horrified, therefore, to learn of the application to develop such a large scale, “industrial” farm within the area. The proposal is out of keeping with the context and indeed with the policies of the National Park as we understand them.”
- “Allowing such industrial scale development would be totally contrary to the aims of Pembrokeshire Coast National Park which is charged with ‘keeping the Park special now and in the future’. In particular, Policy 8 refers to ‘The sense of remoteness and tranquillity is not lost and is wherever possible enhanced’. The existing activity at Velindre, with 540 cows, together with the haulage of materials to and from outlying land , is already having a noticeably detrimental effect on the environment in this area of the Park; further expansion to 860 cows would have the potential to threaten the integrity of this beautiful and sensitive part of Pembrokeshire.”
- “There are several major concerns, including the impact of increasing numbers of large vehicles sharing narrow lanes with other users. Another concern is the guarantee of safe management of such large quantities of slurry close to a water course”
- “This unique, remote and beautiful Pencaer peninsula with an abundance of wildlife has limited narrow roads, with very few passing places and derives much of its income from tourism which will be adversely affected by the siting of such an industrial scale dairy farm”
- “The slurry spreading and activities at the slurry lagoon will exacerbate protracted periods of unpleasant smells and flies affecting the local community’s health and pleasure in living there”
- “It is hard to believe that this is a consideration for granting planning permission so close to the coast path, peoples homes and in the

Item 5 - Report on Planning Applications

national park!"

- "The inevitable problems caused by large vehicles on the narrow roads taking feed in and milk out will be intensified. The risks of a huge slurry pit in the area raises fears of pollution and the inevitable odour problems"
- "What is the likelihood of public nuisance in the form of odours being created by a large slurry lagoon? The area is very windy and so the odours could affect a large area. Will flies be attracted to the lagoon and potentially spread disease?"
- "The farm development is within the national park, near to a SSSI, is close to a river that flows down to Aberbach and the beaches of Aberbach and Abermawr. We are concerned that this area should remain protected. Slurry lagoons do get damaged and the consequences of this could be devastating for local wildlife. We understand that a leak alarm could be installed but how much pollution would escape before any leak could be fixed? Although we realise that the aims of slurry lagoon is to hold the slurry until suitable times to spread, we are concerned that the increase in cattle numbers will see an increase in slurry spreading on the adjacent and rented fields and could lead to the problems associated with nitrate pollution into the water courses of the area"
- "This is an industrial scale agricultural proposal with vast sheds and a vast slurry lagoon totally out of place in a sensitive National Park environment"
- "The position of the proposed slurry lagoon would be visible from a number of public vantage points and would be less than 150m from a public footpath which is used by a considerable amount of visitors who wish to gain access to The Wales Coast Path. That part of the pedestrian's journey will be extremely unpleasant and could potentially be injurious to personal health and wellbeing."
- "Aside from the moral issues around keeping cows indoors with little freedom to move, there are several major concerns including the impact of increasing numbers of large vehicles sharing very narrow lanes with other road users and the safe management of such large quantities of slurry close to a water course"
- "An industrial farming enterprise such as presently exists at Velindre Farm should have no place in a National Park and the new proposals would only make matters much worse. Allowing such an industrial scale development would contravene the aims of the Pembrokeshire Coast National Park which is charged with... 'keeping the Park special both now and in the future'."

Item 5 - Report on Planning Applications

- “As ‘sensitive receptors’ to this planning application, we, as joint owners of Velindre West, make, objection to aspects of this application in the strongest possible terms in that it would adversely affect our views, disturb our peace and tranquillity through increased volumes of traffic both on the lane and the track/coastal path immediately adjacent to our property at various times of the day and night and generally affect our right to an undisturbed, peaceful and quiet existence as we, or anyone else would expect within the Pembrokeshire National Park”
- “Whereas the applicant has stated that certain landscaping will take place, it will be very visually intrusive from Velindre West which faces directly onto the proposed slurry lagoon site and is higher than the site.”
- “The unsympathetic part is that odour will be created. Later on in the application, the applicant says that Velindre West would not be affected. I smell slurry from a farm that is over 2 miles away from where I live, never mind 290 metres, and it is quite insulting and patronising to say otherwise, especially as the prevailing winds blow directly from the proposed slurry lagoon towards Velindre West and are more usually than not, very strong. My understanding is also that the slurry pit has to be ‘stirred’ on occasions which increases the odours”
- “If the development is allowed to go ahead it will have a huge impact on holiday makers staying in these cottages and my livelihood and many others in the area”

Policies considered

Please note that these policies can be viewed on the Policies page Pembrokeshire Coast National Park website - <http://www.pembrokeshirecoast.org.uk/default.asp?PID=549>

LDP Policy 01 - National Park Purposes and Duty

LDP Policy 07 - Countryside

LDP Policy 08 - Special Qualities

LDP Policy 09 - Light Pollution

LDP Policy 11 - Protection of Biodiversity

LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park

LDP Policy 29 - Sustainable Design

LDP Policy 30 - Amenity

LDP Policy 31 - Minimising Waste

LDP Policy 32 - Surface Water Drainage

LDP Policy 34 - Flooding and Coastal Inundation

LDP Policy 35 - Visitor Economy

Item 5 - Report on Planning Applications

LDP Policy 52 - Sustainable Transport
LDP Policy 53 - Impacts on traffic
PPW7 Chapter 04 - Planning for Sustainability
PPW7 Chapter 08 - Transport
SPG05 - Sustainable Design
SPG06 - Landscape
SPG20 - Siting and Design of New Farm Buildings
SPG21 - Accessibility
TAN 06 - Planning for Sustainable Rural Communities
TAN 23 - Economic Development

Officer's Appraisal

Background

The application site has a history of planning applications relating to various new cattle buildings as well as conversion of a building on site to a dwelling. The most recent application was dealt with by the Authority in September 2013 and this proposed retention of two new buildings which were erected without the benefit of planning permission. This application was approved subject to conditions. This current application has been submitted without the benefit of any pre-application discussions.

The farm holding extends to approximately 280ha, comprising of 160ha at Velindre Farm, and a further 45ha at Woodlands Farm at Tregwyn. The holding also rents 75ha of land at Penysgwarne Farm which is approximately 3km to the north east of the site. The holding currently has a milking herd of 540 cows which are housed indoors for the majority of the year and grazed outdoors when weather and soil conditions permit. The applicant explains in the supporting information that there has been significant investment in buildings and infrastructure at the farm which has included a new accommodation building, cattle handling facilities and dairy including a 70-point rotary parlour. Furthermore it is advised that these investments have improved cow welfare, with a resulting fall in culling rates and increased productivity, with the unit achieving yields in excess of 10,000 litres per cow per year.

The farm itself is within 2km of the Coast and is in proximity to two protected sites which include the St Davids Special Area of Conservation (SAC) and the Strumble Head-Llechdarad Cliffs Site of Special Scientific Interest (SSSI). The wider area is mainly agricultural, with dairy and some arable farming along with tourism.

Item 5 - Report on Planning Applications

History

- NP/13/0270 – Velindre Farm, St Nicholas – Cattle Accommodation Building, Dairy Building, Access Track and Silage Storage Area (Retrospective) – Approved – 25 September 2014
- NP/05/564 – Velindre Farm, St Nicholas – Conversion of outbuilding to dwelling – Approved – 14 February 2006
- NP/01/543 – Velindre Farm, St Nicholas – Cattle Housing – Approved – 7 January 2002
- NP/238/95 – Velindre Farm, St Nicholas – Agricultural Buildings – Approved – 25 July 1995
- NP/184/88 – Velindre Farm, St Nicholas – Extension – Approved - 20 May 1988
- NP/583/83 – Velindre Farm, St Nicholas – Cattle Feeding Area – Approved – 22 December 1983
- NP/137/82 – Velindre Farm, St Nicholas – Erection of Cattle Shed – Approved – 22 June 1982

Constraints

- Special Area of Conservation – within 500m
- Biodiversity Issue
- Safeguarding Zone
- Rights of Way Inland – within 50m
- ROW Coast Path – within 10m
- Potential for surface water flooding
- Recreation Character Areas

Current Proposal

The application proposes the erection of a cattle accommodation building with associated yard and the construction of a slurry lagoon.

Cattle Building

The proposed building measures 55m long by 46.6m wide and up to a ridge height of 6.6m with eaves level at 4.9m with three separate roof spans. The building is proposed to be sited in an existing gap between the hedgebank which forms the access into Velindre Farm and an existing complex of buildings. This would accommodate a floor area of 2,552m² to accommodate approximately 320 dairy cows.

Item 5 - Report on Planning Applications

The side walls are proposed to be constructed with climate control curtains on the sides and have open ends. The gable ends are proposed to be finished in dark green profile steel sheeting from eaves height to the roof and the roofing sheets are proposed to be natural grey corrugated fibre cement with skylights.

Slurry Lagoon

The slurry lagoon proposed is an irregular shape with its longest axis measuring 110m long by 60m wide and is proposed on land located approximately 280m west of the farm unit. The lagoon would be 4.4m deep and provide a useable volume of 14,800m³. Slurry would be pumped from the existing slurry storage tower which is at the farm to the lagoon via an overland umbilical pipeline and underground road crossing. Excess spoil from the excavation of the lagoon would be used in the banks of the slurry store to provide landscaping. Landscaping is shown to consist of a new 120m hedgerow to be positioned 15m away from the east and south facing banks of the lagoon. Submitted photomontages also identify that the existing hedge to the north would be left to grow to twice its existing height (approximately 2.5m – 3m).

The farm currently employs ten full-time staff and two part-time staff and it is expected, after expansion, that the farm would employ eleven full-time staff and two part-time workers.

The application has been supported with the following information;

- Design & Access Statement (v2 August 2014)
- Supporting Statement/Policy Appraisal (Amended v3 – August 2014)
- Options Appraisal (July 2014)

Key Issues

The application raises the following planning matters:-

- Policy and Principle of Development
- Visual Amenity and Special Qualities of the National Park
- Highway Safety, Access and Parking
- Neighbouring Amenity and Privacy
- Slurry Spreading, Water and Waste matters
- Impact upon Ecology
- Lighting Impacts
- Alternative Options
- Economic Benefits

Item 5 - Report on Planning Applications

Policy and Principle of Development

The general thrust of National Policy in the form of Planning Policy Wales (PPW) (Edition 7, July 2014)¹ and Technical Advice Note 6 acknowledges support for farming and particularly sustainable agriculture.² PPW states (para.7.6.5) *“Local planning authorities should adopt a constructive approach towards 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”*.

Whilst a general support for farming expansions is evident in policy terms what needs to be considered in this particular case is whether the expansion proposed for this farm is an appropriate development within the National Park having particular regard to the special qualities of the National Park and policies set out in the LDP.

Policy 1 – National Park Purposes and Duty (Strategy Policy) advises that development must be compatible with (a) the conservation or enhancement of the natural beauty, wildlife and cultural heritage of the Park, and, (b) the public understanding and enjoyment of those qualities. Particular reference is made to the need to have regard to fostering the economic and social well-being of local communities provided this is compatible with the statutory purposes of the National Park.

In terms of countryside protection policies, Policy 7 – Countryside, sets out the types of developments that will be permitted in countryside locations (i.e. outside of a recognised Centre). This includes, within criterion (h), farm buildings justified for agricultural purposes. The supporting text to this policy, at paragraph 4.43 of the LDP advises *“The National Park countryside is an important contributor to tourism, farming, conservation etc .Issues for the Park include finding the right approach to the amount of development to be permitted, taking account of accessibility issues, the need to sustain local communities and the need to protect the National Park landscape.”*

Whilst therefore the principle of agricultural development can be supported there is a clear need to assess the impact of this development through its character within the landscape and consider other relevant material considerations including matters such as highway safety, neighbouring amenity particularly in relation to odour matters along with matters relating to slurry storage and management. Other relevant considerations include any impacts upon ecology, lighting impacts, consideration of alternative schemes and any economic benefits of the proposal.

Visual Amenity and Special Qualities of the National Park

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan (LDP) is a strategic policy which refers to the special qualities of the National

¹ Paragraph 7.6.5 Planning Policy Wales (Edition 7, July 2014)

² Paragraph 6.1.1. Technical Advice Note 6: Planning for Sustainable Rural Communities July 2010

Item 5 - Report on Planning Applications

Park and lists priorities to ensure that these special qualities will be protected and enhanced. Policy 15 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. Criterion 'c' resists development that would introduce or intensify a use which is incompatible with its location. 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.

Policy 29 of the LDP requires all development proposals to be well designed in terms of place and local distinctiveness (criterion 'a'). 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').

The application site is positioned along the boundary of the National Park and near a key tourist route from St Nicholas through to Strumble Head. The site also lies adjacent to a public right of way giving access to the coast path. The Authority has produced a Landscape Character Assessment of the National Park as Supplementary Planning Guidance and the application site is placed within Local Character Area (LCA) 20 - Trefin. This area is defined as being a large linear coastal area running southwards from the prominent rocky hill of Garn Fawr south westwards to the eastern end of the Carn Llidi hills up to but excluding Carn Penberry. Visually this area consists of a series of tall indented cliffs and steep slopes with occasional jagged rocky outcrops contrasting with more sheltered inlets set between. The hinterland, within which the application site falls, is defined as being gently undulating agricultural landscape of medium sized fields with close visual relationship with the adjacent coast. The area is interspersed with regular scattered farmsteads and occasional hamlets and small villages. In classification against LANDMAP criteria the area is defined as containing high, outstanding and moderate visual and sensory aspect areas along with high and outstanding historic and cultural landscape aspect areas.

It is clear that the development proposed offers quite a dramatic change to the scale of the farming enterprise taking place. The farm currently has a milking herd of 540 cows which are housed indoors for the majority of the year and then grazed outdoors when weather and soil conditions permit. This application would result in further expansion to provide for a new additional building to accommodate approximately 320 cows in addition to a new slurry lagoon to meet the slurry storage requirements of the increased herd size. The new herd size to prevail as a result of this application would be 860 cows.

The applicant advises that there has been significant investment in the farm in recent years through the construction of a new accommodation building, cattle handling facilities and dairy including a 70 point rotary parlour. The facilities are provided through two buildings approved by the Authority last year (NP/13/0270) which now allows the unit to achieve yields in excess of 10,000 litres per cow per year.

Item 5 - Report on Planning Applications

The key question to ask therefore in dealing with this application is whether the development proposed will conserve or enhance the character and appearance of the National Park?

The building proposed as part of the application would measure 55m long by 46.6m wide and up to a ridge height of 6.6m. It would be positioned alongside two existing large agricultural buildings thereby creating a closed block of four buildings as opposed to the current situation with three buildings. The applicant suggests that although the building is large it is of a similar scale to the adjacent farm buildings and of a typical construction on modern dairy units.

Whilst the siting chosen appears to be the most logical solution to providing an additional building the key consideration here is whether the form and appearance of the farm would, as a result of the development, increase to a scale which would harm the special qualities of the National Park. Planning permission was granted retrospectively for the retention of two buildings erected at the site; however, this was subject to implementation of a detailed landscaping scheme submitted with the application. The landscaping has now been planted along the south boundary of the site, however, this will take a number of years to mature to any extent to help mitigate some of the bulkiness of the existing buildings. However, even once that mitigation is established, the farm will still have a noticeable effect on the landscape, notwithstanding the steps being taken to mitigate that effect.

The building proposed would be located near to the site access and whilst set against the backdrop of the existing structures the new roof area will add to the bulkiness of the built environment with it occupying an expanse across an area of 2563m². The public view at the site access from the highway will be one of an industrial nature due to the sheer number and form of the buildings that would result from this additional structure.

In regard to wider viewpoints as depicted in the viewpoints presented by the applicant (VP1, VP2, VP3, VP4, VP5, VP6) it is clear that whilst the building will not stand alone in its form and will integrate visually with the existing structures it will have the result of increasing the viewable roof area of the buildings at Velindre Farm. This will have the result of placing further emphasis on the farm complex in views towards the coast which will resultantly have impact upon the appearance of the landscape.

The slurry lagoon element of the proposal would involve the creation of a large lagoon within an existing unspoilt field to the west of the farm complex. Some errors were contained in some documents provided by the applicant in respect of an incorrectly quoted size of the lagoon, however, it is established from the drawings and recent correspondence that the lagoon proposed measures 110m long by 60m and follows the shape of the west field boundary in an irregular shape.

Item 5 - Report on Planning Applications

The applicant has provided a 'line of sight diagram' (Drawing RAC/6199/9) which refers to a position on the highway north of St Nicholas looking towards the site for the proposed slurry lagoon. This indicates that due to proposals for a new hedge at 2m high the sight line would not take in views of the lagoon itself. In addition to this two photomontages have been produced (PM1, PM2) with views taken from the public footpath near the proposed site as well as from land to the east. Viewpoint PM1 shows a view towards the site from a position on the highway to the north of St Nicholas. This indicates the position of the proposed slurry lagoon behind the buildings with proposed new hedgerow. Viewpoint PM2 shows closer range views of the slurry lagoon viewed from the public right of way near the site. This indicates that the existing hedge will be allowed to grow to twice its existing height, however it also indicates that some of the lagoon surface will be visible.

It is considered that screen planting will help aid and potentially shield some views of the slurry lagoon, however, parts of the lagoon would still be visible from the public footpath as well as longer distance views due to the topography of the land. Views from the east of the application site in combination with existing and proposed complex of buildings will have the cumulative effect of harmfully changing the landscape character of this part of the National Park. This change will ensue for a larger expanse of industrial type buildings coupled with a slurry lagoon which is not considered to be a development which compliments or in any way enhances the National Park landscape. The National Park is charged with conserving and enhancing its natural beauty, wildlife and cultural heritage and the public understanding and enjoyment of those qualities. A slurry lagoon, in this instance will neither conserve nor enhance the qualities that the National Park is widely acclaimed for having and protecting (Policy 8 refers).

Although the applicant considers that the development would not be of a scale that could make any 'significant' impact on the character of the wider landscape, its strategic position in the National Park means that it would be a prominent and disruptive element.

The landscape in this part of Pembrokeshire is rightly considered to be a valuable resource and the proposed changes to this large site would have a perceptibly harmful impact. The proposed development would consequently conflict with the policy requirement to protect the quality of the surrounding landscape (policies 8, 15, 29 and 30 refer).

In summary of the issues, whilst there may be a case that additional mitigation such as further planting could help mitigate some views of both the new building and lagoon, it is not considered that this would go far enough in protecting the special qualities of the National Park. The development would remain part of the landscape for many future years. As such the development will result in a loss of a sense of remoteness and tranquillity (policy 8 criterion a), will not protect the pattern and diversity of the landscape (Policy 8 criterion c), will be insensitively and unsympathetically sited within the landscape (Policy 15 criterion b), will introduce and intensify a use which is incompatible with its location (Policy 15 criterion c) will fail to harmonise with or enhance

Item 5 - Report on Planning Applications

the landform and landscape character of the National Park (Policy 15 criterion d). The development is not considered to be well designed in terms of place and local distinctiveness (Policy 29 criterion a), is of an incompatible scale with its surroundings and is visually intrusive (Policy 30 criterion b and d).

Highway Safety, Access and Parking

Policies 52 and 53 of the Local Development Plan refer to sustainable transport and the traffic impacts of proposed development requiring that new development has no adverse impact upon traffic safety. The application has not been supported with a detailed Transport Assessment; however, the applicant has provided information on the type and number of journeys associated with the existing and proposed farm as a result of expansion. This information is included within the 'Supporting Statement/Policy Appraisal' document (Amended v3 August 2014) and the below tables have been copied from Appendix 7: Traffic Forecast.

Item 5 - Report on Planning Applications

Total Annual Traffic Movements at Velindre Farm (Existing)1 vehicle movement is a movement either onto or off the site

Movement type	Movement		Vehicle	Movements/year
Forage ¹⁰	29	/Month	Tractor & Trailer	350
Blend feed	60	/Year	29t HGV	60
Straw (feed)	34	/Year	11.5t Tractor & Trailer	34
Parlour cake	29	/Year	29t HGV	29
Sawdust (bedding)	18	/Year	20t HGV	18
Milk tankers	56	/Month	29,000 Litre HGV	672
On-site staff (6)	24	/Week	Car/LGV	1,248
Off-site staff (4) ²¹	30	/Week	Car/LGV	1,560
Foot trimming	4	/Month	Car/LGV	104
Vet	2	/Week	Car/LGV	24
Livestock Transfers (beef calves)	4	/Month	Car/LGV	48
Livestock Transfers (fallen stock)	4	/Month	Car/LGV	48
Minerals, dairy chemicals etc	12	/year	15t HGV	12
AI	2	/Year	Car/LGV	2
Post	12	/Week	Car/LGV	624
Contractors (slurry) ²²	833	/Year	Tractor & Trailer (2,300 gallon)	833
Total HGV				791
Total Tractor & Trailer				1,217
Total Car/LGV				3,658
Total				5,666

Item 5 - Report on Planning Applications

Total Annual Traffic Movements at Velindre Farm (Proposed)

1 vehicle movement is a movement either onto or off the site

Movement type	Movement		Vehicle	Movements/year
Forage ¹⁰	46	/Month	Tractor & Trailer	557
Blend feed	95	/Year	29t HGV	95
Straw (feed)	53	/Year	11.5t Tractor & Trailer	53
Parlour cake	46	/Year	29t HGV	46
Sawdust (bedding)	28	/Year	20t HGV	28
Milk tankers	56	/Month	29,000 Litre HGV	672
On-site staff (3)	24	/Week	Car/LGV	1,248
Off-site staff (7) ²²	40	/Week	Car/LGV	2,080
Foot trimming	4	/Month	Car/LGV	104
Vet	2	/Week	Car/LGV	24
Livestock Transfers (beef calves)	4	/Month	Car/LGV	48
Livestock Transfers (fallen stock)	4	/Month	Car/LGV	48
Minerals, dairy chemicals etc	12	/year	15t HGV	12
AI	2	/Year	Car/LGV	2
Post	12	/Week	Car/LGV	624
Contractors (slurry) ¹⁴	576	/Year	Tractor & Trailer (2,300 gallon)	576
Total HGV				853
Total Tractor & Trailer				1,186
Total Car/LGV				4,178
Total				6,217

Summary Table

	Existing	Proposed	Difference
Total HGV	791	853	62
Total Tractor & Trailer	1,217	1,186	-31
Total Car/LGV	3,658	4,178	520
Total	5,666	6,217	551

The supporting information provided states that this application would allow an increase in herd size by approximately 320 cows. The calculations put

Item 5 - Report on Planning Applications

forward by the applicant appear to demonstrate that there would be an overall increase in movements at the farm of 551 per year or 1.5 movements per day. However, the applicant advises that of these the majority would be car related movements for workers. The information specifies that HGV movements would increase by 62 movements a year or approximately 1 additional movement a week. HGV movements are related to feed and bedding whilst the number of milk tankers visiting the site will remain unchanged as the herd would not exceed the capacity of the current collection vehicle (29,000 litre HGV). In terms of the impact of these movements on the local traffic the applicant advises this is minimal and in any event the journeys of milk tankers are regularly during night time hours. It is also inferred that HGV's access the national road network by driving north to the crossroads at Trefasser, before heading south on the C3019 St Nicholas Road to the A487, minimising the use of narrow lanes.

It is further explained in the supporting information that traffic movements relating to tractors and trailers collecting forage and spreading slurry would be expected to decrease by approximately 31 movements overall when compared to the existing situation. Currently the farm has a small slurry store on-site, with the majority of slurry being regularly transported by road for storage at Penysgwarne and Woodlands Farms to the north and south. The applicant advises that construction of the proposed lagoon would allow for the majority of slurry arising from the farm to be stored onsite and would avoid the need for these traffic movements. It is also explained that issues surrounding spreading campaigns would be reduced as the 6 month storage period would allow slurry to be spread at a much reduced intensity which would also significantly reduce the effect on other road users and local residents. The impact of farm movements on local residents would be further minimised as approximately half of these movements are south towards Woodlands Farm and half towards Penysgwarne Farm.

The Authority consulted Pembrokeshire County Council Highway Authority in relation to this application. An initial response to the application (7 July 2014) raised some potential concerns and whilst not objecting to the application suggested the provision of three new passing places for vehicles along with visibility splays at both side of the Velindre Farm access road. In that response the Highway Officer had based this opinion on the traffic increasing at the site and not being made aware that the scheme would include a pipe to pump raw slurry between the farm and slurry lagoon.

Following receipt of the additional supporting information the Highway Authority issued a revised response (1 August 2014) explaining that the new information importantly describes that a thrust-bore pipe will be installed under the County Road allowing all the slurry to be collected on the farm to be piped to the new lagoon. This means there will not be specific two-way tanker movements crossing the road to fill up the lagoon. Likewise the Highway Authority advises that it has been confirmed that slurry for the fields around the Velindre Farm itself can be pumped for spreading using the proposed pumps and pipes. The response advises that further to this it has been explained that the initial two way movements from Velindre Farm to fill up the

Item 5 - Report on Planning Applications

satellite slurry lagoons will be greatly reduced. It is suggested in response that the increased volumes of HGV's bringing in food for the larger herd within the proposed building can therefore be offset against the reduction in slurry tanker movements. As such the requirement for passing places and visibility improvements have not been maintained by the Highway Authority.

Notwithstanding this the Highway Authority has suggested a condition be imposed in relation to a requirement for a detailed plan to be approved showing all pumping of slurry within the holding and the pipes for pumping under the County Road before the slurry lagoon is first brought into use.

Whilst there is clear concern from objectors that the development proposed will result in additional harm upon the highway network of the area the advice of the Highway Authority in conjunction with the information provided in relation to vehicle movements leads to the conclusion that the development will not have an adverse impact upon the traffic safety in the area. This is an existing working farm and there are existing narrow lanes in the vicinity. Based on the traffic movement information provided by the applicant, the development would not conflict with the requirements of Policy 53 and suitable conditions could be attached requiring improvements to access arrangements, management of timing of deliveries as well as of control relating to the areas of spreading and methods.

Recent communication received from objectors to the development raise concerns with the movement figures presented by the applicant. The response advises that the information contains significant errors and even misrepresentation of the traffic movements described in Appendix 7. It is contended that the total number of slurry tanker movements should be 3320 and not the 576 movements declared. This information has been relayed to the applicant's agent and the Highway Authority and any further clarification will be relayed verbally at the committee meeting.

Neighbouring Amenity and Privacy

Policies 29 and 30 of the Local Development Plan seek to protect community cohesion and health and to avoid incompatible development that would lead to a significant adverse impact upon amenity. The supporting text at paragraph 4.136 explains that the policy aims *"to protect the amenity enjoyed in people in their residences, workspaces and recreational areas. Amenity is defined as those elements in the appearance and layout of town and countryside which makes for pleasant life rather than mere existence. Anything ugly, dirty, noisy, crowded, intrusive or uncomfortable is likely to adversely affect amenity"*.

The potential impacts from the proposals relate to potential odour and noise as well as disturbance from the increased activity at the farm. A number of objections to the application have been received which have been summarised in an earlier paragraph. A lot of objections received focus on the potential harm of the development upon amenity in the area through odour, harm to amenity of the National Park and visitors to the National Park in

Item 5 - Report on Planning Applications

general as well as harm to public health. Others raise concern about the intensive nature of farming being undertaken.

The Authority has consulted Pembrokeshire County Council's Environmental Health Section on matters of amenity. Environmental Health officers advise of no objection to the application and explain that the proposed lagoon has been designed to comply with the relevant legislation/guidance. Natural Resources Wales has responded to the application consultation and also raised no objection subject to the slurry lagoon being designed to meet the slurry regulations.

It is understood that a specific odour management plan may only be required for slurry lagoons which are located within 200m of a neighbouring property or protected dwelling. This is in line with advice produced by the former Environment Agency Wales entitled 'Pembrokeshire Good Practice Guidance: Slurry Stores'.

In the case of the application site the proposed slurry lagoon lies approximately 220m from the nearest receptor 'Velindre West' to the north east, the next closest property is 'Pwll-Crochan' which lies 250m to the north west. Additional properties are located some 350m to 400m to the south of the proposed lagoon site and include the property group including 'Hafod', 'Isyllt Fach' and 'Tresissllt'. Other properties include 'Tre-limmin' which is 740m to the north of the site, 'Tregyddulan' which is 830m to the north-east, 'Cranged' which is 740m to the east and the village of St Nicholas which lies 800m to the east.

The applicant explains in the submission that impact upon the amenity of the majority of the dwellings (from the proposed slurry lagoon) will be limited due to a combination of distance and prevailing wind direction (south-westerly). Also it is advised that during the winter storage period a crust will form on the surface of the lagoon comprising bedding material. The applicant's agent explains "*the crust has a significant effect on the level of odour arising from the lagoon as it suppresses emissions. Although the dwelling at Velindre West is downwind of the proposed slurry lagoon, the combination of distance and dilution and dispersion caused by average wind speeds significantly reduce any effect on this dwelling*". The applicant's agent also advises that it is not expected that noise from cows housed at the farm would be a significant issue, as the level of noise arising from animals relates directly to welfare, with noise only arising from distressed animals.

A letter of support has been received from 'Alta UK' the company responsible for visiting the site on a weekly basis to undertake fertility management of the herd. In relation to some concerns raised about animal welfare the writer explains:

I have read the letters opposing the application and am extremely dismayed at the completely unsubstantiated statements made with regard to poor husbandry and farming practices undertaken. Within my role at Alta UK I visit Velindre on a weekly basis and undertaken the fertility management of the

Item 5 - Report on Planning Applications

herd. As part of a team comprising of an Alta UK AI technician, Mike John, the Vet and Daniel Harries himself I monitor all aspects of performance at the dairy... Velindre's Pregnancy rate runs at 24%. The national UK Dairy herd pregnancy rate is 13%. Velindre is nearly twice the national average and places in the top 1% for the whole country. Velindre's daily average milk yield per cow is 36.6 litres. The national herd average is 21 litres per cow. Again Velindre places in the top 3% for the whole country. The annual mortality rate at Velindre is 3.1%. The national herd average is 8%. Again Velindre is well below the national average. Velindre is a well managed herd with some of the best figures in the whole of the UK. Only happy healthy cows can obtain and sustain this level of performance. I hope that the snapshot of date that I have shared with you will put to bed the fictitious and unfounded statements that have been made"

The owners of Velindre-West and Pwll-Crochan have both registered objections to the application and are concerned with the potential impact the development will have upon the amenity of their properties both visually and through odour.

Amongst other matters Policy 30 states that development will not be permitted where it has an unacceptable impact on amenity particularly where:

- (a) the development is for a use inappropriate for where people live or visit;
- (c) the development leads to an increase in traffic or noise or odour or light which has a significant adverse impact; and/or

It is clear from the plans provided that whilst the Environmental Health team are satisfied with the proposed siting from a public nuisance/odour control dimension, the slurry lagoon would be in proximity to a number of properties. Although the applicant has proposed some bank screening around the lagoon with a hedgerow and additional growth to the adjacent hedge it would remain that the lagoon would be visible from Velindre West and the access towards Pwll-Crochan. It will lie in proximity to the public footpath which leads in a westerly direction towards the Coast Path.

In relation to criterion (a) whilst the site lies within the countryside and is part of an active rural farming enterprise the development and use of a slurry lagoon measuring 110m across its longest axis by a width of up to 60m is considered to be an inappropriate use for where people live or visit. The supporting text to Policy 30 advises that the policy aims to protect the amenity of people in their residences, workspaces and recreational areas and anything ugly, dirty, noisy, crowded, intrusive or uncomfortably is likely to adversely affect amenity. In this instance the relationship of the slurry lagoon, which is an ugly and uncomfortable development within this setting, will adversely affect the amenity of the adjacent occupiers. Furthermore the site is in view of a public right of way which leads to the Wales Coast Path and it is considered to be an inappropriate development in this particular location within the National Park.

Item 5 - Report on Planning Applications

In relation to criterion (c) whilst there will be odour from the slurry lagoon and this emanate in the area and near existing residences in view of the lack of objection from Environmental Health it cannot be held that the development will lead to a noise or odour issue which will have a significant adverse impact.

To summarise it is considered that the development by virtue of expansion of the farm coupled with the slurry lagoon proposal will have an adverse impact upon the amenity of neighbouring occupiers as well as visitors to the area. As such the development fails to comply with the requirements of policy 30 (criteria a).

Slurry Spreading, Water and Waste matters

The applicant advises in the supporting statement that the farm currently uses 345ha for slurry spreading which easily exceeds the recommended minimum area of 273ha required for the proposed size of the herd at the holding (assuming a minimum application rate of 83m²/ha). A plan has been provided (RAC/6199/6) which identifies the extent and location of the slurry spreading area which is on land parcels to the north and north west of the application site as well as on land at Penysgarwarne farm to the north east.

The information submitted advises that a new slurry lagoon is required in order to meet the slurry storage requirements of an increased herd size and also to provide additional storage to allow greater flexibility for slurry spreading operations. Once fully stocked it has been calculated that the unit would require an additional 140,100m³ of slurry storage for a six month period.

The proposed lagoon would be 4.4m deep and provide a useable volume of 14,800m³. Slurry would be pumped from the existing slurry storage tower which is located at Velindre Farm to the lagoon via an umbilical pipeline and underground road crossing. A plan showing this proposed arrangement has been provided (RAC/6199/8).

In terms of potential pollution of surface and ground waters the information submitted advises that in order not to give rise to the risk of pollution the slurry store would be constructed to comply with The Water Resources (Control of Pollution) (Silage, Slurry and Agriculture Fuel Oil) (Wales) ['SSAFO'] Regulations 2010.

In terms of water management the applicant acknowledges that the construction of large areas of impermeable surfaces has the potential to raise flood risk elsewhere through increased run-off. Due to the large surface area of the proposed roof of the new building this has the potential to increase run off. Information received confirms that all run-off from the roofs of the new building will be collected and discharged into an existing irrigation reservoir with a unused volume of approximately 3,400m³ located to the south of the site. The outfall of this reservoir is fitted with a hydraulic brake to ensure that water discharges are minimised. (no more than 2 litres per second). As this

Item 5 - Report on Planning Applications

reservoir is no longer used for its original purpose (potato crop irrigation) it is left with ample spare capacity for accommodating run-off from extreme events.

In response to consultation Natural Resources Wales, the relevant Authority for slurry storage and water management matters confirm no objection to the proposal provided that the new slurry is designed to meet the above mentioned Regulations. However they note the intention to utilise a clay liner for the earth bank lagoon and request that a copy of the clay content analysis results are submitted for their records and the planning file. The applicant is currently undertaking this analysis and will furnish the results when ready. No concerns have been raised in relation to the proposed water management.

In view of the comments received from NRW and the fact that these matters could be addressed by a suitable planning condition there is no objection to raise upon impact to the water environment through the slurry proposals. Notwithstanding the concerns raised in relation to other aspects of this proposal it is considered that the development is acceptable in relation to its impact in terms of water and drainage and accords with the aims of Policy 32.

Impact upon Ecology

In terms of impacts upon ecology the site has not been identified as one which contains any protected species that could be harmed as a result of the development. The Authority's Ecologist advises that a desktop assessment has found that there is a low likelihood of protected species being found at the development site or that there would be any adverse impact on the habitat or species as a result of development. As such a protected species survey or habitat survey have not been formally requested. However, advice has been given that consideration should be given to any external lighting as bats may forage and commute along the hedgerows and over the fields. Lighting should be downward facing, as dim as possible and on a timer and could be covered by a suitable planning condition.

With regard to potential impacts upon protected areas it can be noted that the nearest ecologically designated sites to the farm unit are the St David's SAC and Strumble Head-Llechdafad Cliffs SSSI approximately 800m west of the farm and 460m west of the proposed lagoon site.

The supporting information advises that the farm follows a manure management plan which ensures that the areas adjacent to the SAC/SSSI and watercourses are avoided as per the information presented in the above paragraphs. In addition it is advised that prevailing winds combined with timing of spreading would significantly reduce the occurrences of wind blowing emissions arising from spreading land towards the protected sites. The information explains that the ammonia releases from the proposed slurry lagoon would not likely have an adverse impact on sensitive receptors due to these not being downwind of the lagoon and are a distance away (in excess of 400m). The Authority has no evidence to contradict the information and based on the responses of Natural Resources Wales and the Authority's

Item 5 - Report on Planning Applications

Ecologists are satisfied that there will be no harm upon protected species or areas. As a result the scheme complies with the aims of Policy 11.

Lighting Impact

In terms of lighting itself the applicant advises that the cattle accommodation building would be unlit during daylight hours but in winter the accommodation building would be lit during those hours of darkness which fall between 05:00 and 23:00 to improve milk output and feed intake. During the night (23:00 to 05:00) lighting in the building would switch to low intensity red coloured light which allows farm workers to view the herd whilst providing a dark period for the cattle. The submitted information advises that luminaires within the cattle building would comprise fluorescent lighting units suspended close to the roof ridge on approximately 1m chains and approximately 15m spacing. Due to their positioning the internal luminaires will not be directly visible from outside the building. There are no proposals put forward for outdoor lighting as part of this application. In view of the fact that lighting will remain inside the building, controlled on timers and of a scale suitable for the needs of the herd it is not considered to result in adverse harm to the area. Such lighting matters could be controlled through a suitable planning condition, as could the installation of any external lighting.

Alternative Options

Concern was raised through consultation that a lack of consideration had been given to alternative sites for the proposed slurry lagoon. In response the applicant produced a plan (RAC/6199/7) as well as supporting document 'Options Appraisal July 2014' explaining the different sites available for siting of a slurry lagoon. The majority of sites around the farm are dismissed on the basis of potential groundwater restrictions, gradient restrictions, being within 200m of properties as well as landscape and visibility restrictions. The consideration of whether the applicant has alternative locations where he could provide a slurry lagoon does not affect the fact that he is entitled to have the proposal judged and considered upon its own merits. While the site proposed does appear to be a logical solution based on the information provided, the harm identified in earlier paragraphs has to be considered.

Economic Benefits

It is accepted that the proposals are part of an expansion proposed at an existing working farm. As such consideration needs to be given to any economic benefit the scheme may have upon this area in general and the National Park itself. Planning Policy Wales (Edition 7, July 2014) Chapter 7 advises at paragraph 7.6.5 that "*Local planning authorities should adopt a constructive approach towards agricultural development proposals, especially those which are designed to meet the needs of changing farming practices*". In terms of the information provided the applicant specifies that there are currently 10 full time and 2 part time staff employed. The proposed application would result in a net gain of 1 full time member of staff taking the total

Item 5 - Report on Planning Applications

employed to 11 staff and there would be further temporary benefits during the construction period. .

Whilst the creation of employment benefits are a material consideration in applications for planning permission these benefits must be weighed in the balance. In this particular instance it is considered that the balance falls in favour of supporting the conservation of the National Park over the benefits of the creation of a single additional full time job and any temporary work or other economic benefits brought from this scheme.

Conclusion

The proposed development would allow the farm to expand its milking operation from 540 up to 860 milking cows. Although offering the economic benefit of one additional full time role and some additional benefits during the construction period, and enhanced output at the farm the intensive nature of development is considered to represent an inappropriate and harmful industrial form of development on land within the open countryside within the National Park. The proposed development by reason of its very form, character and scale will erode the special qualities of the National Park and will not be compatible with the strategic aims of conserving or enhancing the natural beauty, wildlife and cultural heritage of the National Park, and the public understanding and enjoyment of those qualities.

The cattle accommodation building and slurry lagoon will expand the site area visible and result in an unacceptable loss of a sense of remoteness and tranquillity, will not protect the pattern and diversity of the landscape, will be insensitively and unsympathetically sited within the landscape, will introduce and intensify a use which is incompatible with its location, and will fail to harmonise with or enhance the landform and landscape character of the National Park. The development is not considered to be well designed in terms of place and local distinctiveness, will be of an incompatible scale with its surroundings and be visually intrusive. In addition to these concerns the slurry lagoon by virtue of its form, scale and siting will have an adverse impact upon the amenities of neighbouring occupiers and visitors to the area due to the development consisting of a use inappropriate for where people live and visit..

As such the proposal is considered to be in conflict with policy. If planning permission were to be granted for the scheme in the face of this conflict, the harms identified would need to be clearly outweighed by other material considerations, as required by S38 (6) of the Planning and Compulsory Purchase Act 2004. There are advantages to the proposal that weigh in favour of the grant of planning permission and these advantages include the fact that the proposed development would create additional employment, both permanently on the farm, and during the temporary construction phase, as well as the increase output of the farm. However, the benefits of the scheme are considered to be far outweighed by the harm to the special qualities of the National Park in this instance.

Item 5 - Report on Planning Applications

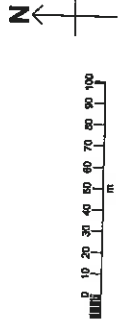
In summary it is concluded that the development fails to comply with the requirements of policies 1, 8, 15, 29 and 30 of the Pembrokeshire Coast National Park Local Development Plan and National Policy in the form of Planning Policy Wales (Edition 7, July 2014) and is recommended for refusal.

Recommendation

The application be refused for the following reasons:

1. The proposed development represents an inappropriate and harmful industrial form of development on land within the open countryside within the National Park. The proposed expansion through a new cattle accommodation building and slurry lagoon by virtue of their siting, form, character and scale will erode the special qualities of the National Park and will not be compatible with the strategic aims of conserving or enhancing the natural beauty, wildlife and cultural heritage of the Park, and the public understanding and enjoyment of those qualities. The development will result in a loss of a sense of remoteness and tranquillity, will not protect the pattern and diversity of the landscape, will be insensitively and unsympathetically sited within the landscape, will introduce and intensify a use which is incompatible with its location and will fail to harmonise with or enhance the landform and landscape character of the National Park. The development is not considered to be well designed in terms of place and local distinctiveness, is of a scale that is incompatible with its surroundings and is visually intrusive. As such the development is contrary to the requirements of Policy 1 (National Park Purposes and Duty), Policy 8 (Special Qualities) (criteria a and c), Policy 15 (Conservation of the Pembrokeshire Coast National Park) (criteria b, c and d), Policy 29 (Sustainable Design) (criterion a) and Policy 30 (Amenity) (criteria a, b and d) of the Pembrokeshire Coast National Park Local Development Plan (Adopted September 2010) and Planning Policy Wales (Edition 7, July 2014).
2. The slurry lagoon by virtue of its siting, form, character and scale will have an adverse impact upon the amenities of neighbouring occupiers and visitors to the area due to the development consisting of a use inappropriate for where people live and visit, contrary to the requirements of Policy 30 (Amenity) (Criteria a, b and d) of the Pembrokeshire Coast National Park Local Development Plan.

NP 14 3 11



18 July 2014

MK	REVISION	DATE

DRAWING TITLE

LOCATION PLAN

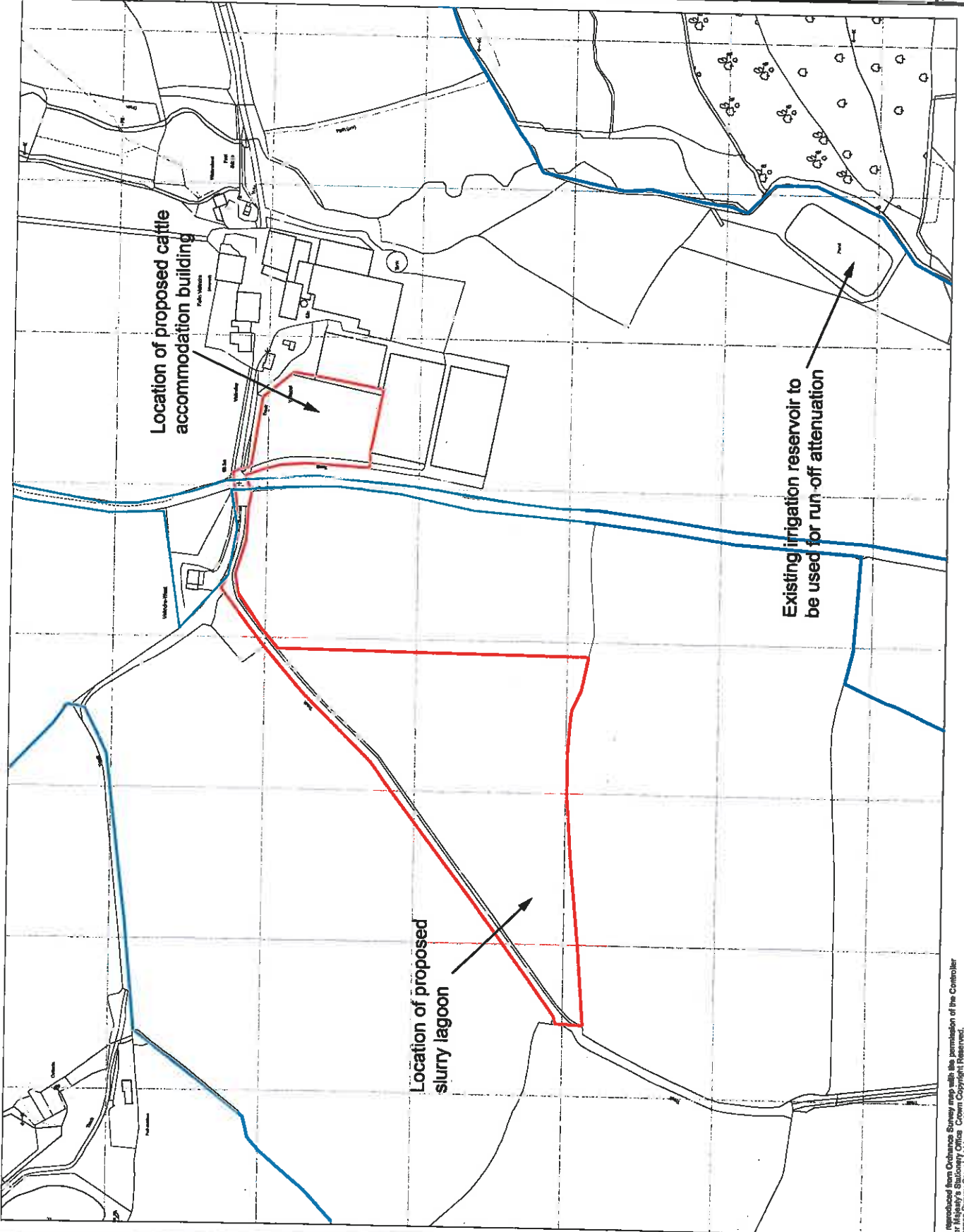
CONTRACT

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Drawn	Ch'kd.	Rev.
AL		RAC/6199/1
Scales	Date	
1:2,500@A3	May 2014	



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Scale 1:100

**CATTLE ACCOMMODATION-
EXISTING AND PROPOSED
SITE PLAN**

Client:
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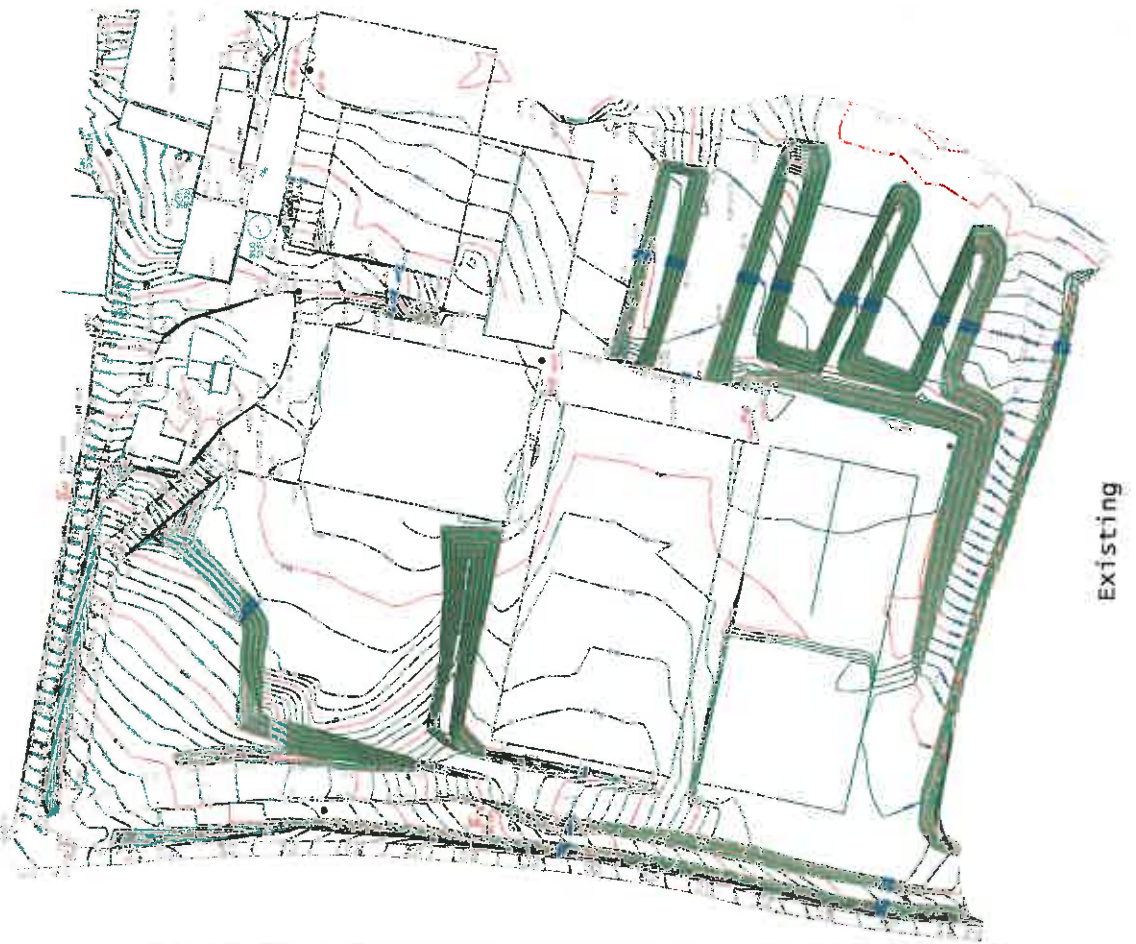
Resolving Agricultural Consultants Ltd
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 Tel: 01323 821774 Fax: 01323 821775
 www.resolving-ag.com

Project:
RAC61619/2

Date:
18/02/2014



Proposed



Existing

NP 14 3 1 17 June 2014

Full details of limitations to be found in supporting statement



UK	14/03/14	14/03/14
PROJECT TITLE		

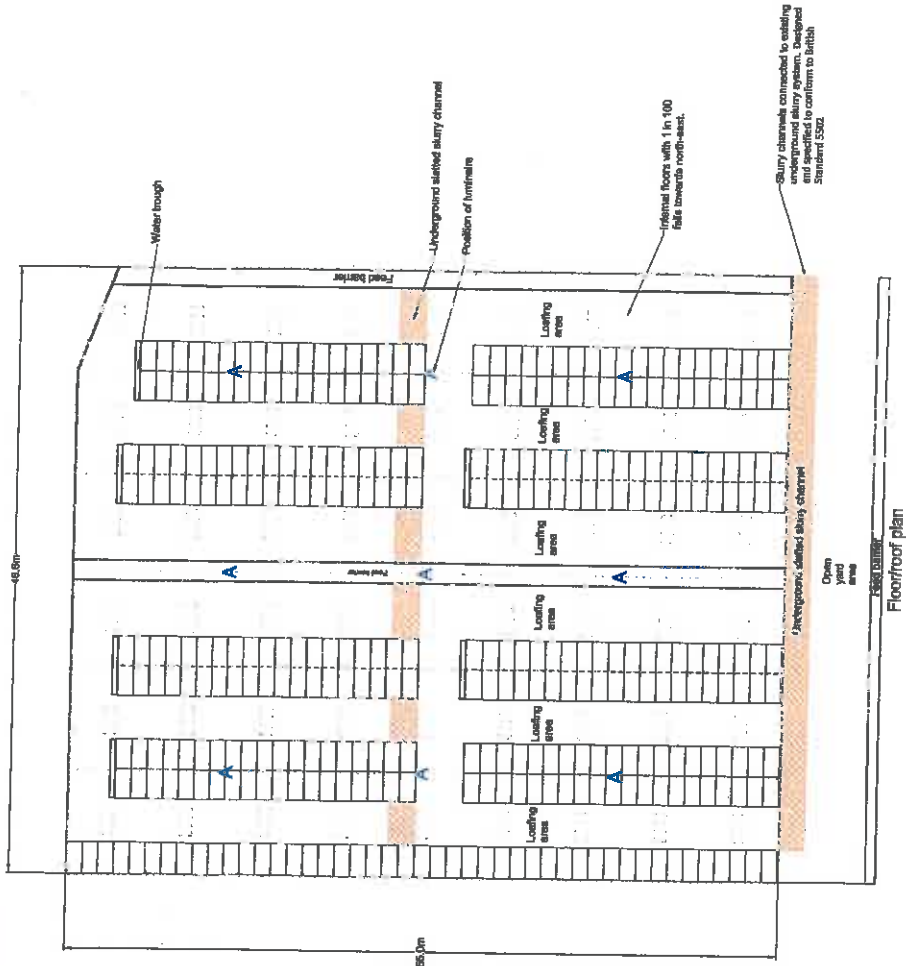
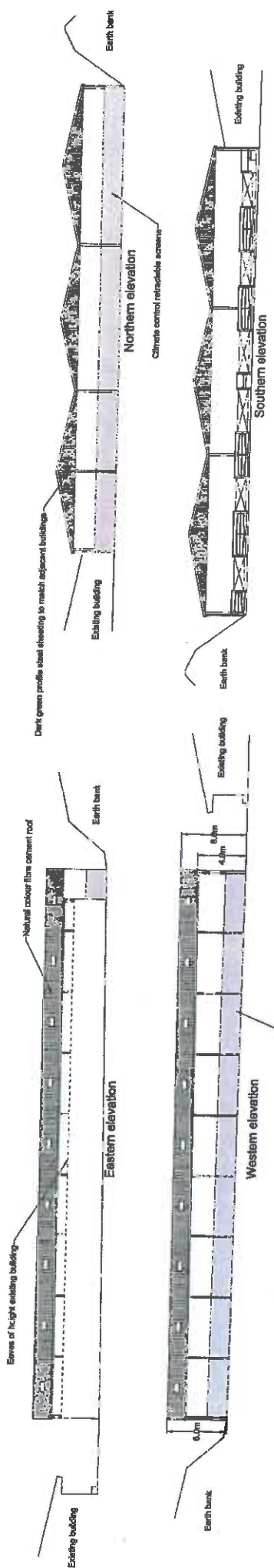
CATTLE ACCOMMODATION- PROPOSED ELEVATIONS

CONTRACT

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Reading, RG1 1AA
Tel: 0118 9861111
www.reading-agricultural.co.uk

APR 17 2014
RAC6189/3
14/03/14



Floor/roof plan

NF 14 3 1 1

1:50000000

North

0 20 40

James G. L.L.C.

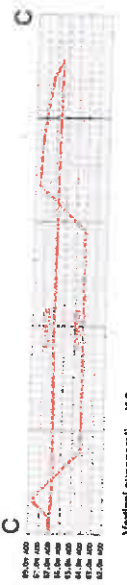
SLURRY LAGOON- EXISTING SITE PLAN

CONTRACT

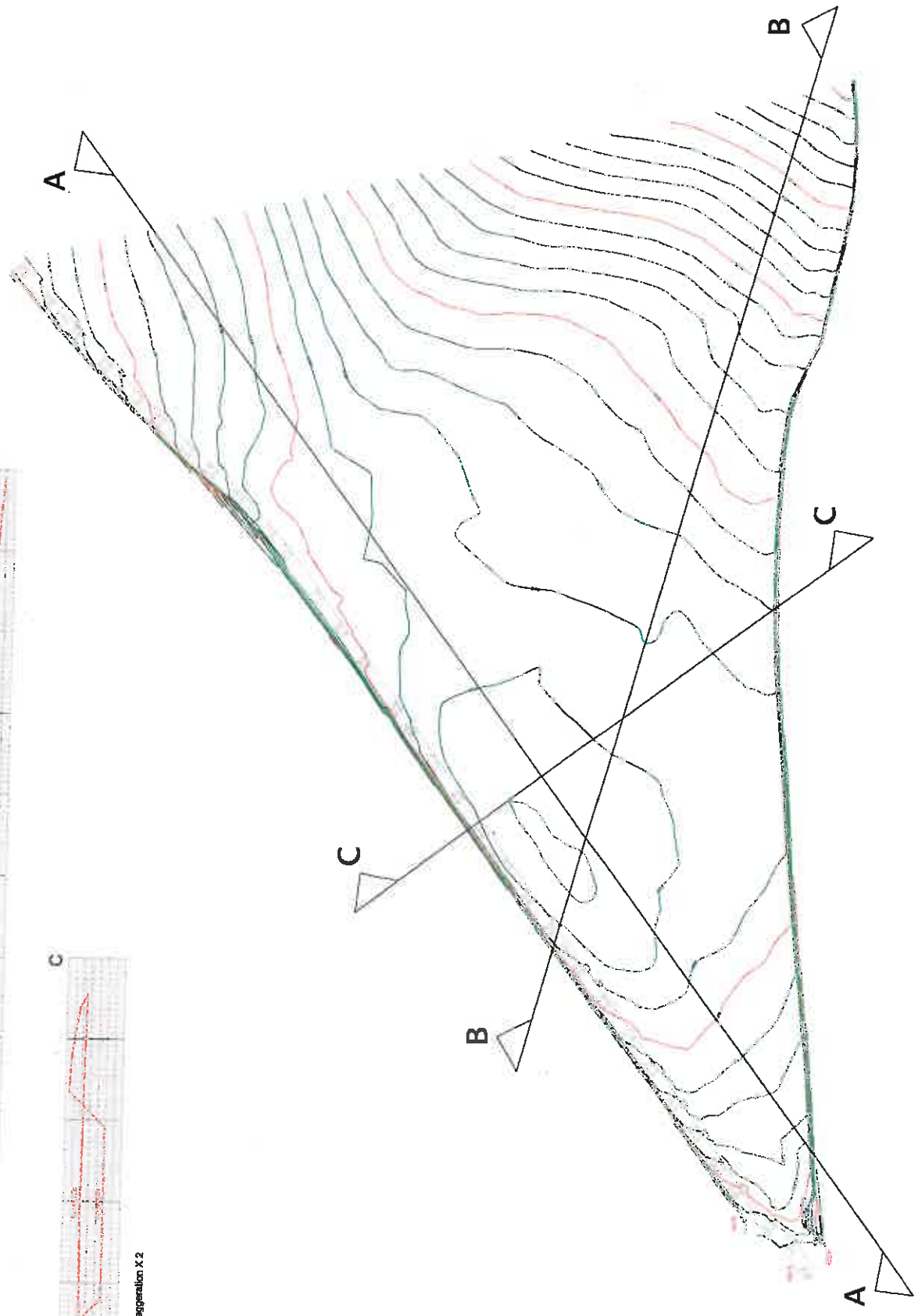
MRD HARRIES
VELINDRE FARM
ST NICHOLAS
PEMBROKESHIRE
SA84 0LJ

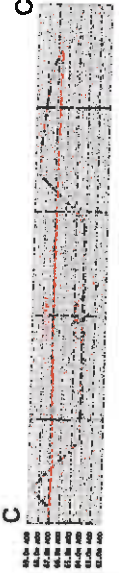
Reading Agricultural Consultants Ltd
Reading Agricultural Consultants Ltd
100, The Park, Reading, RG2 9AT
Tel: 0118 321 1111 Fax: 0118 321 1112
www.reading-ag.com

AL Plan RAC/1594
Contract July 2014



Vertical exaggeration X 2

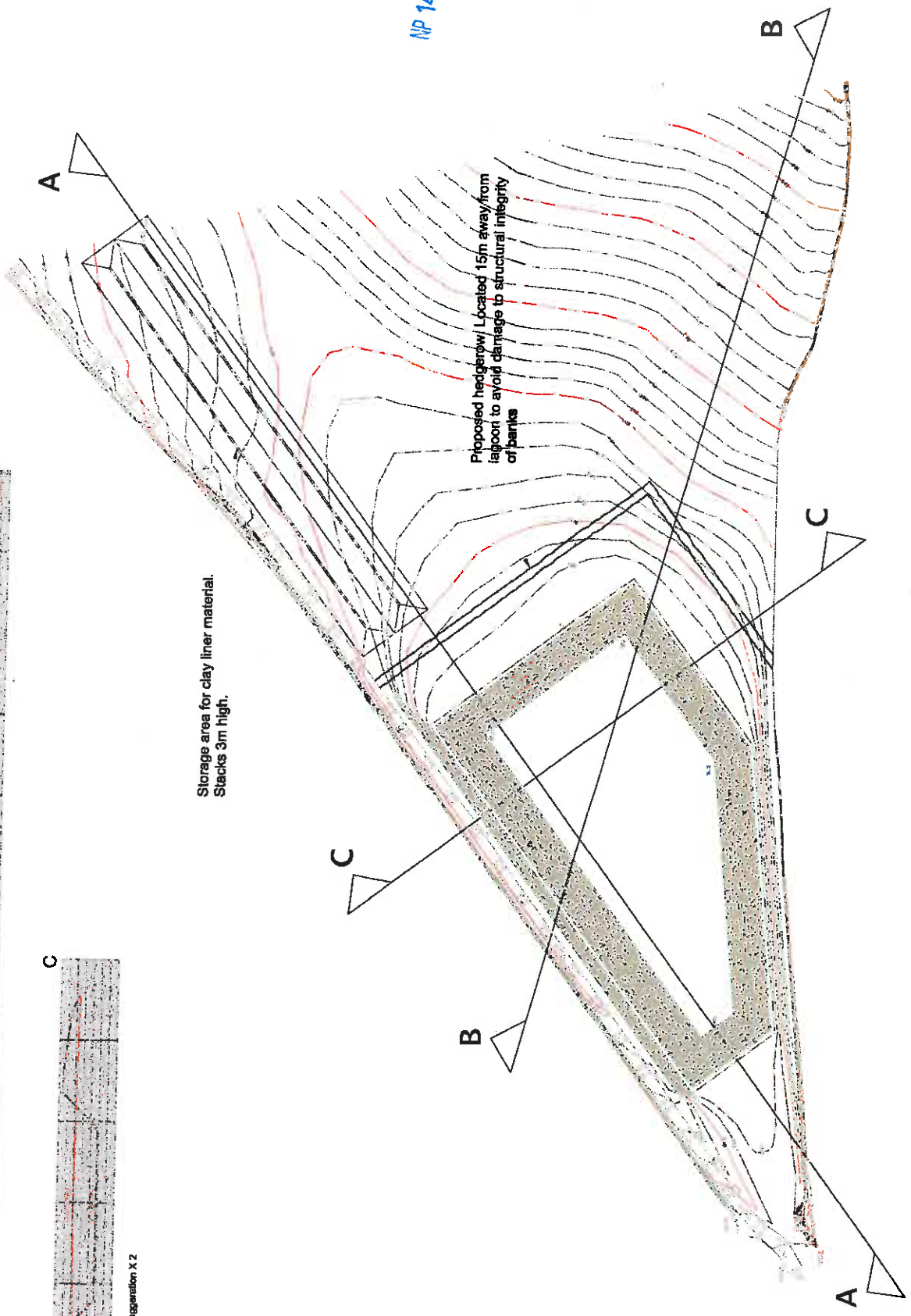




Vertical exaggeration X 2

Storage area for clay liner material.
Stacks 3m high.

Proposed hedgerow/ Located 15m away from
lagoon to avoid damage to structural integrity
of banks



MP 14 3 11

- 1:5 D.M.

Scale 1:5000
Clay liner storage area shown

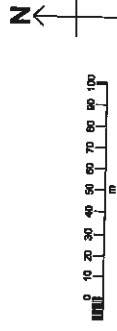
1:5 D.M.

1:5 D.M.

1:5 D.M.

PROPOSED TITLE	
SLURRY LAGOON- PROPOSED SITE PLAN	
CONTRACT	
MR D HARRIES VELINDRE FARM ST NICHOLAS PEMBROKESHIRE SA84 0LJ	Reading Agricultural Consultants Ltd 140 OXFORD ROAD, BATH, BA2 9AT 01225 310000 www.reading-ag.com
DATE: 27/05/2014	PROJECT: RAC08185/5
SCALE: 1:5000	REV: B

22 JUL 2014



MK	REVISION	DATE

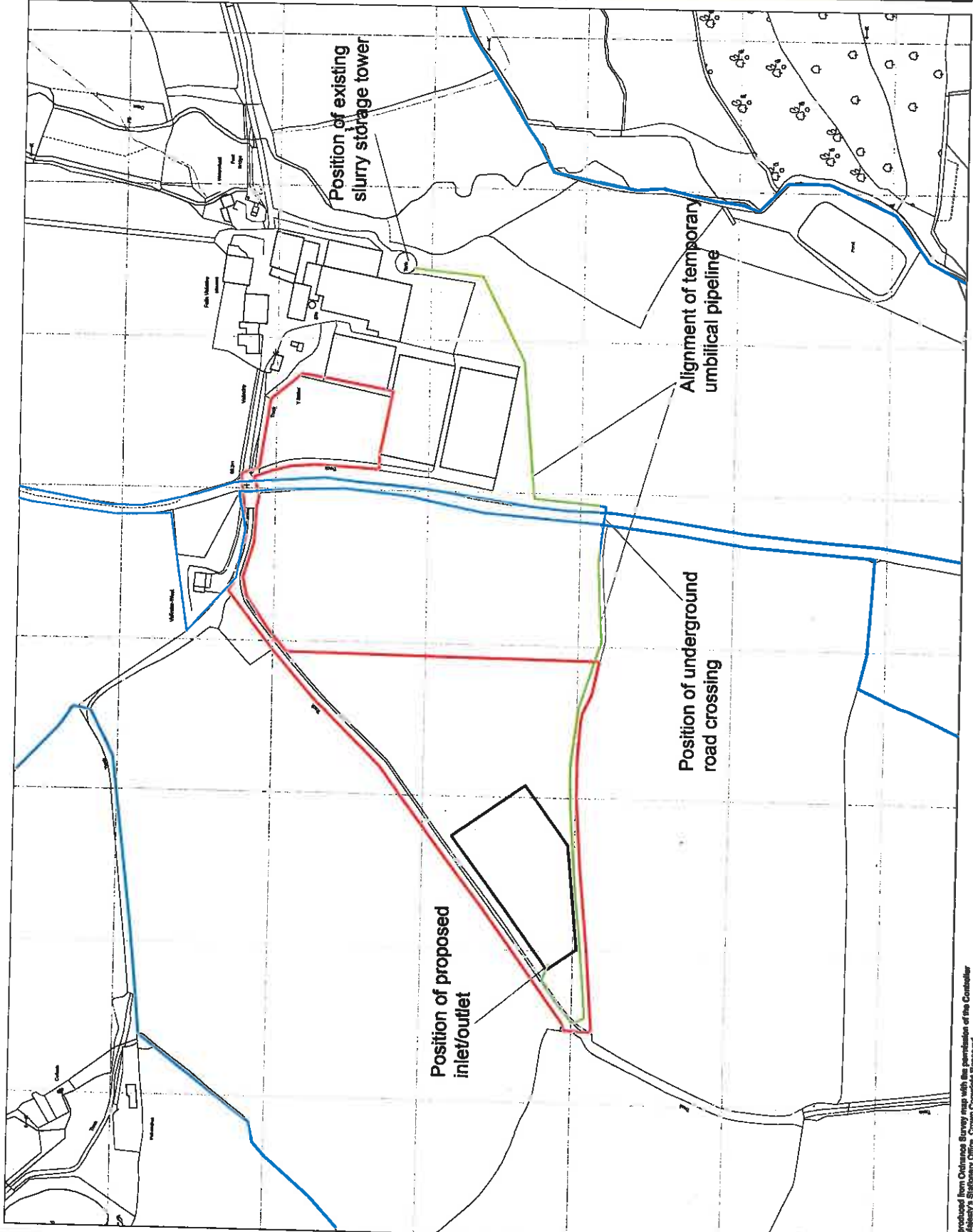
DRAWING TITLE
TEMPORARY SLURRY PIPELINE PLAN

CONTRACT
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 Gate House
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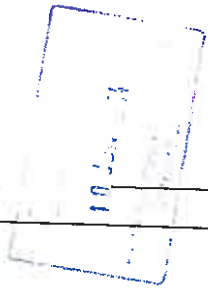
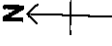
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Scale:	1:2,500@A3	Date	July 2014
Rev.	RAC/6199/8		



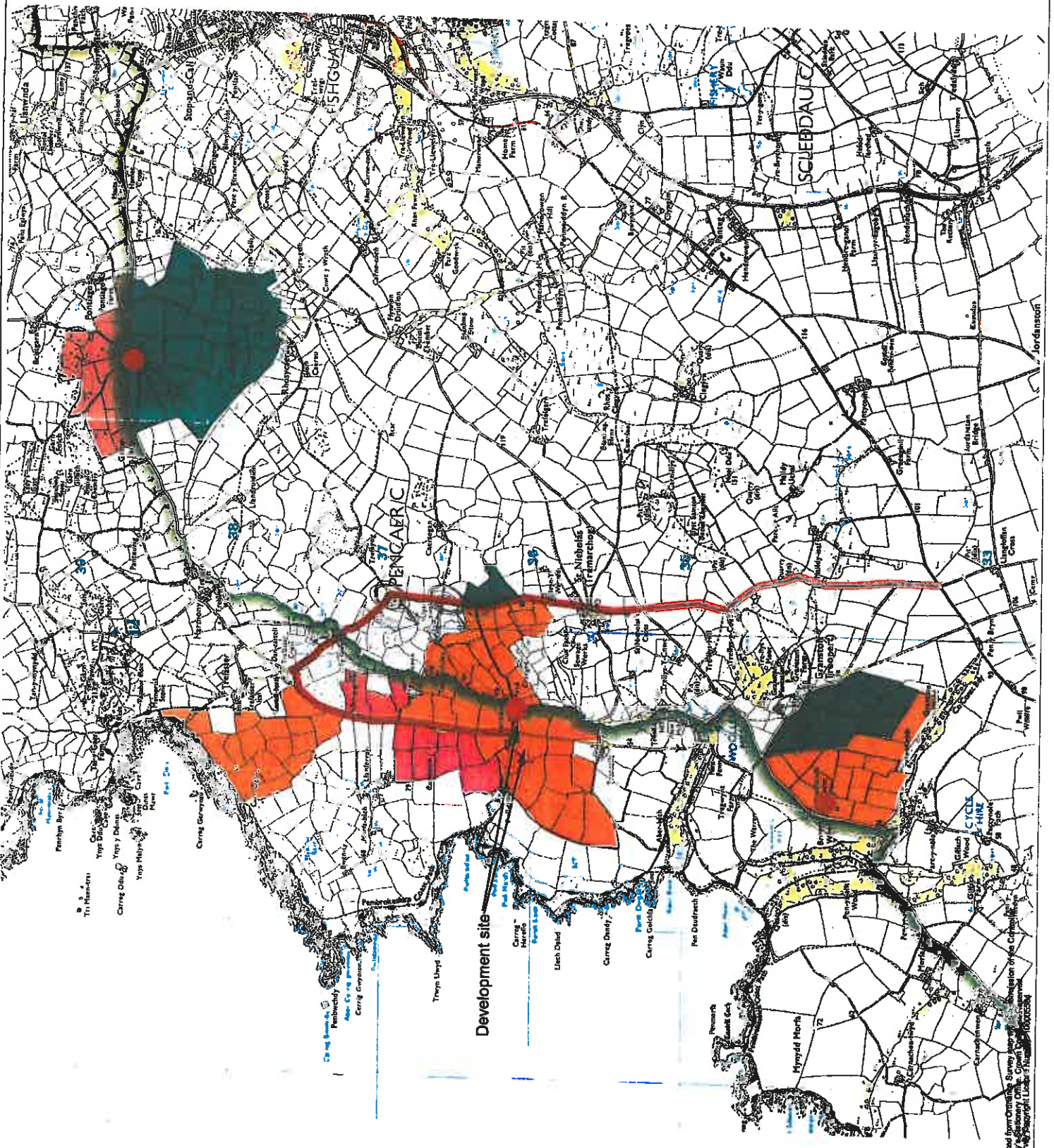
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MP 14 3 11

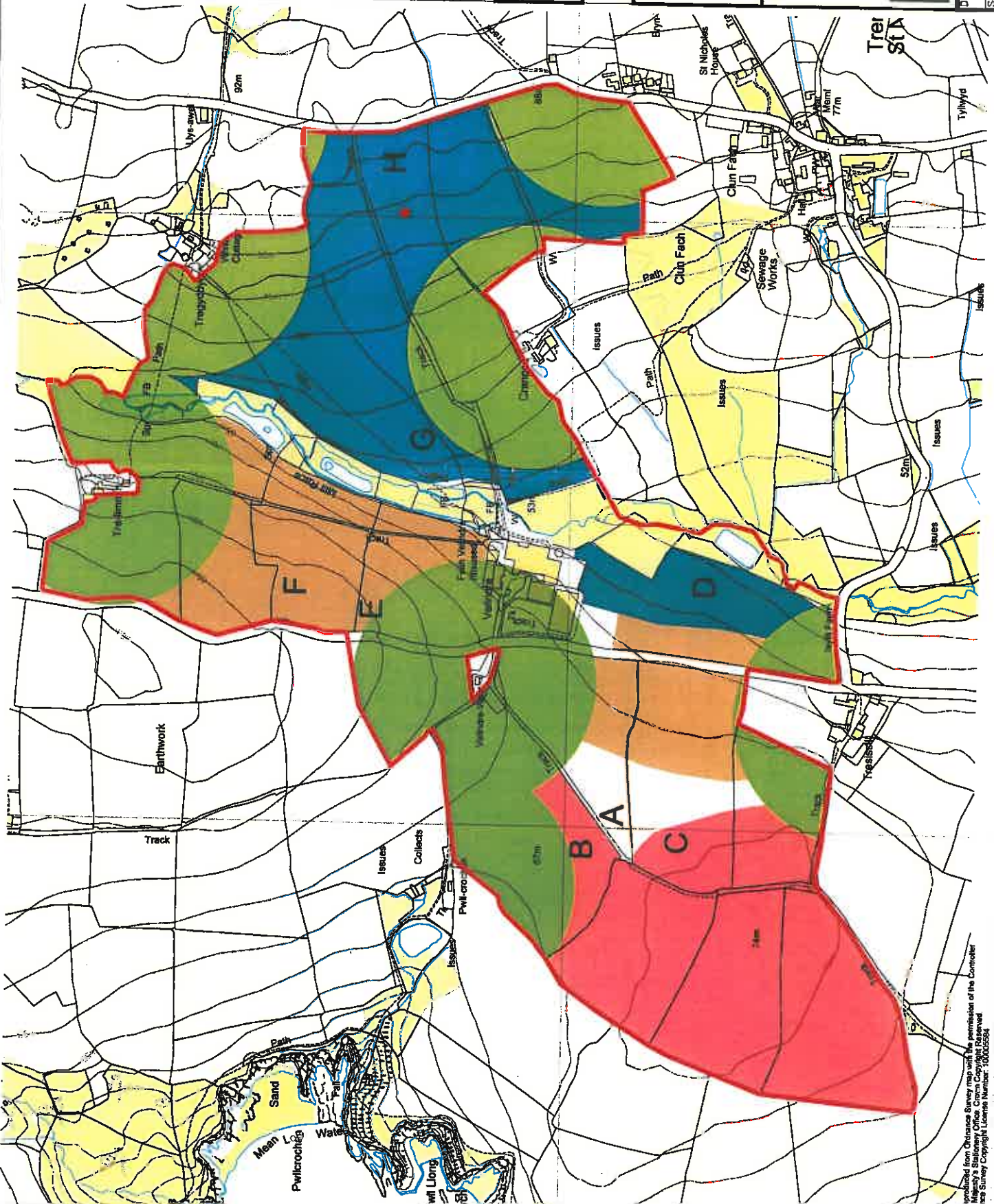
- Owned land
- Rented land
- Slurry spreading agreements
- Position of existing slurry stores
- Farm haulage route



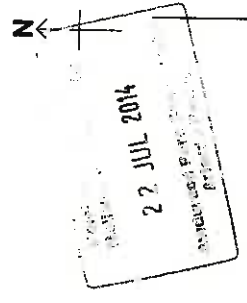
MK	REVISION	DATE
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HOLDING PLAN		
CONTRACT		
MR D HARRIES VELINDRE FARM ST NICHOLAS PEMBROKESHIRE SA64 0LJ		
Reading Agricultural Consultants Ltd Gate House Beechwood Court Long Toll Woodcote RGS ORR Tel: 01491 684233 Fax: 01491 680800 www.readingagricultural.co.uk		
Drawn	Ch. Icd.	Rev.
AL	PWD	RAC/6199/6
Scales	Date	May 2014
N.T.S.		



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- <200m of dwelling
 - Landscape/visibility restriction
 - Gradient restriction
 - Groundwater restriction
- A** Site assessed (see accompanying Options Appraisal)



MK	REVISION	DATE
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DRAWING TITLE

OPTIONS APPRAISAL

CONTRACT

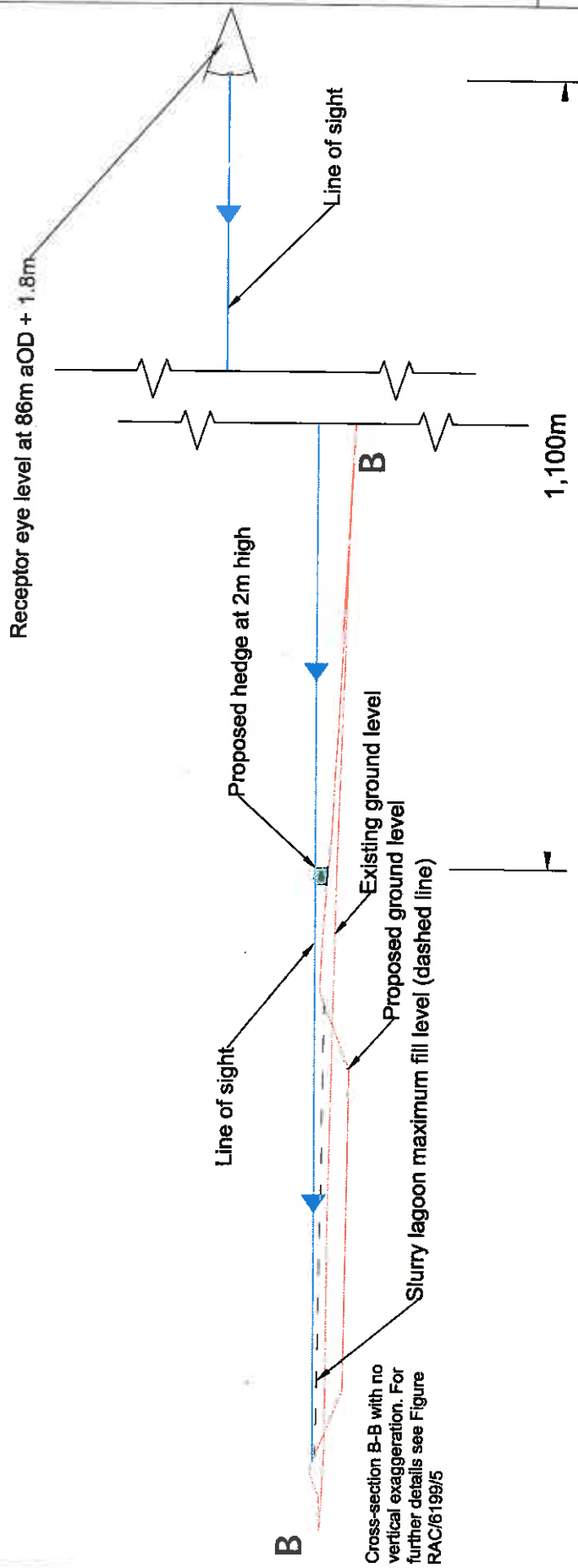
**MR D HARRIES
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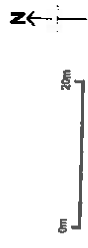
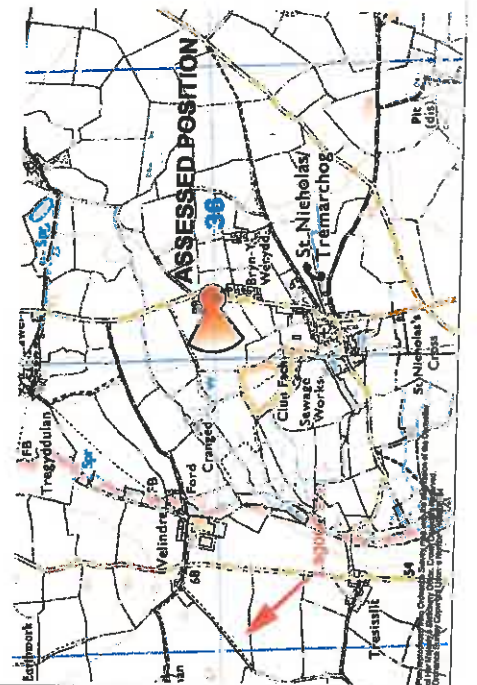


Drawn	Ch'kd	PWD	Rev.
AL			RAC/6199/7
Score	Date		
N.T.S.	July 2014		

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Cross-section B-B with no vertical exaggeration. For further details see Figure RAC/6/199/5



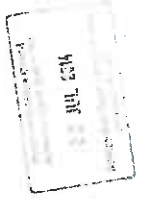
MR	REVISED	DATE

DRAWING TITLE
LINE OF SIGHT DIAGRAM

CONTRACT
**MR D HARRIES
VELINDRE FARM
ST NICHOLAS
PEMBROKESHIRE SA64 0LJ**

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61a-61b
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www.readingagricultural.co.uk

Client	AL	Scale	1:1000 @ A2	Date	July 2014
Drawn	AL	Checked	PWD	Project	RAC/6/199/5

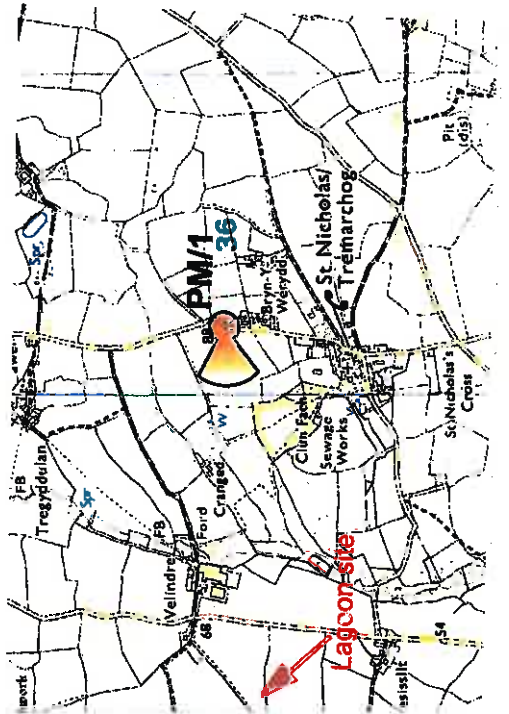


22 JUL 2014

Lagoon banktop shown by red line

Lagoon banktop shown by green line (grass) with dark fill for surface of lagoon. Hedgerows proposed for landscaping also shown.

Camera Type: Nikon D3200 AF-S DX Nikkor 18-55mm lens (set at 34mm for 50mm/35mm equivalent focal length)
 Date/Time: 17 April 2014, 10:25am
 S grid reference: SM 90196 35989
 Viewpoint height: 86m AOD
 Distance from development (slurry lagoon): 1,140m



PM1 - BEFORE/AFTER PHOTOMONTAGE OF SITE FROM GATEWAY ON HIGHWAY NORTH OF ST. NICHOLAS	
CONTRACT	
MR D HARRIES VELINDRE FARM ST NICHOLAS PEMBROKESHIRE SA64 0LJ	
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Drawn AL	On file PWD
Scales N.T.S.	Date July 2014
Rev. RAC/6199/PM1/1	

22 JUL 2014

Lagoon banktop shown by red line



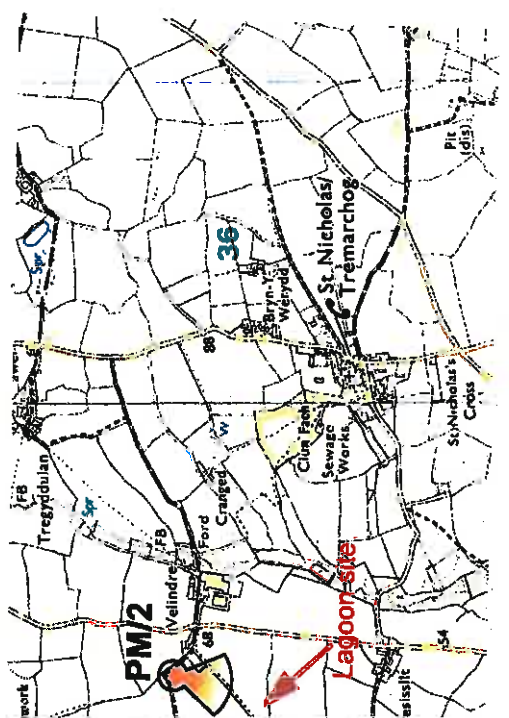
Lagoon banktop shown by green line (grass) with dark fill for surface of lagoon.



Proposed hedges

Existing hedge allowed to grow to twice existing height (approx 2.5-3m)

Camera Type: Apple iPhone (not appropriate focal length to represent human eye - zoom effect)
 Date/Time: 15 July 2014, 17:13pm
 OS grid reference: SM 88162 36187
 Viewpoint height: 73m AOD
 Distance from development (slurry lagoon): 250m



DRAWING TITLE	
PM2 - BEFORE/AFTER PHOTOMONTAGE OF SITE FOOTPATH NORTH OF LAGOON	
CONTRACT	
MR D HARRIES VELINDRE FARM ST NICHOLAS PEMBROKESHIRE SA64 0LJ	
Reading Agricultural Consultants Ltd Gate House Beechwood Court Long Tail Woodcote RG8 0RR Tel: 01491 684233 Fax: 01491 680800 www.readingagricultural.co.uk	
Drawn AL	Checked PWD
Scales N.T.S.	Date July 2014
Rev. RAC/6199/PM/2	

