

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

This application is reported to the Development Management Committee following resolution of members to defer the item at the Committee Meeting on 22 October 2014. The reason given for deferment was to allow the applicant to submit amended landscaping proposals. This deferment followed consideration of the application at the 10 September 2014 Committee Meeting and a Site Inspection carried out by members on 22 September 2014.

The application proposes the erection of a cattle accommodation building with associated yard area on the existing farmstead and the construction of a slurry lagoon on an adjacent field parcel of land. 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 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.

Officers have considered the revised landscaping proposals and commissioned an independent landscape consultant report considering the scheme provided. As a result of the conclusions of that report and from considering the information provided as part of the complete application it remains the view of officers that the development will have an adverse effect upon the special qualities of the National Park such that the recommendation of refusal remains.

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

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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 permanently on the farm, and during the temporary construction phase, together with increased profitability for the farm. There is no evidence to support the assertion that this development is necessary for the farm for the continued operation of the farm. The economic benefits of the scheme should not be overstated and 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: Due to declarations of personal and prejudicial interest from some councillors the Council were not quorate for this item of business on the agenda and were therefore unable to make any decision or comment.

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

PCC – 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 from any potentially affected property.

Natural Resources Wales (NRW): No objection – We have considered the plans submitted in support of the above application and have no objections to

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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.

CADW – No objection – There is only one potentially inter-visible designated asset; PE080 Castell Poeth located c1.6km away, at this distance there will be no significant effect on the monument's setting.

PCNPA – Rights of Way: No objection subject to informatives.

PCNPA – Planning 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.

Dyfed Archaeological Trust: No objections.

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.

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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 (Pembrokeshire Herald) on 20 June 2014 and letters of notification were sent to neighbouring occupiers on 20 June 2014.

As documented in the original committee report of 10 September 2014 up until 18 August 2014 there were 7 letters of support to the application including a petition containing 218 signatures. Furthermore there were 56 individual letters of objection to the application. A summary of the responses received was listed in the 10 September 2014 committee report.

Following the report and Development Management Committee meetings of 10 September 2014 and 22 October 2014 the Authority has continued to receive letters of correspondence in regard to this application.

An additional letter of support has been received from the National Farmers Union (NFU) on 9 December 2014. A full copy of the letter is appended to this report for information purposes. In summary the letter raises the following matters:

- Concerns about the manner in which the planning application has been handled by the Authority with particular concern about the Development Management Committee's continuing deferral of the application.
- Concerns about why the application was not included for discussion on the agenda for the 3 December 2014 committee and also concern about officers receiving and raising third party concerns.
- Queries made about the information held on the Authority's website with regard to the red line drawn around the application site as opposed to the proposed slurry lagoon itself.
- The importance of farming as an industry is explained in the letter and the duty of the Authority's own management plan to support the core objective of promoting sustainable agriculture.
- Explains that NFU has long called for the planning system to demonstrate a thorough understanding and appreciation of the role of agriculture and for an appropriate balance to be struck between the weight attached to the protection of the landscape and community and business development within the National Park.

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- Explains that generations of farms, such as Mr Harries and his family have shaped the landscape and environment of the Pembrokeshire Coast National Park area long before the National Park was designated and the establishment of the Authority.
- Advises of formidable challenges that the farming industry faces.
- Advises Mr Harries has invested in modern and state of the art dairy unit which encompasses innovation and technology whilst ensuring the highest standards of animal welfare.
- Concludes that based on discussions NFU can only conclude that this development is absolutely necessary for the continued operation of a modern efficient dairy unit, and that's its location will enable the business to continue to farm to the highest standards.

A further 10 letters of objection have also been received from third parties including the chairman of the Pembrokeshire branch of Campaign for the Protection of Rural Wales. Copies of these letters are attached for the benefit of members.

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

LDP Policy 52 - Sustainable Transport

LDP Policy 53 - Impacts on traffic

PPW7 Chapter 04 - Planning for Sustainability

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PPW7 Chapter 08 - Transport
SPG05 - Sustainable Design
SPG06 - Landscape
SPG19 - Siting and Design of New Farm Buildings
SPG20 - Accessibility
TAN 06 - Planning for Sustainable Rural Communities
TAN 23 - Economic Development

Officer's Appraisal

This application was considered at the Development Management Committee meeting on 10 September 2014 with a recommendation of refusal. Officers considered that the application failed to comply with policies 1, 8, 15, 29 and 30 of the Local Development Plan. At this meeting the application was considered by members with discussion about the planning merits of the scheme. Members resolved to defer the application to arrange a site inspection. The applicant was also asked to provide additional information regarding slurry spreading and traffic movements in sufficient time for this to be considered by statutory consultees prior to the next meeting of the committee.

The site inspection took place on 22 September 2014 and the applicant also submitted further information appertaining to the proposals by email on the same day. The information consisted of an additional report for the committee produced in response to queries raised at the meeting and included a slurry spreading and water pollution management plan, a line of sight diagram, a draft landscaping plan and a plan showing cross sections of landscaping. Further information on traffic movements was received on 3 October 2014.

The application was reported back to the 22 October 2014 Development Management Committee and the additional information was considered. The scheme was again considered by members with debate. A motion to refuse the application in line with the recommendation was seconded, however, on voting this motion was not carried. Further discussion took place surrounding the application and members suggested a deferment to allow the applicant opportunity to provide enhanced landscaping proposals for consideration at the next available Committee meeting.

Officers contacted the applicant's agent outlining the information requested by members and explained that in order to be considered at the next committee meeting, which was scheduled for 3 December 2014, the additional information would need to be forthcoming by 11 November 2014. The reason for this being that the committee report is produced in advance of the meeting itself, officers needed time to consider the information provided and produce a report with recommendation based on the additional information.

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The additional information was received on 18 November 2014 and officers advised the applicant's agent that the scheme would now be taken to the 21 January 2014 committee for consideration.

Background to Application

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 new 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 applicant 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.

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

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- 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 at the existing farm complex and the construction of a slurry lagoon in a field to the west of the farm complex.

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 provide a floor area of 2,552m² to accommodate approximately 320 dairy cows.

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

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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.

Original landscaping proposed provided for 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).

A new landscaping scheme was provided by email on 18 November 2014 proposing a new woodland habitat surrounding the lagoon. The landscaping proposed is in belts of 10-15m, including thicker blocks at the corners to improve ecological potential. It is also proposed to include a biodiversity enhancement scheme including bird/bat boxes, woodpiles and enabling access in the fencing for birds and small mammals.

It is understood from the supporting information that 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:

- Application form and plans
- Design & Access Statement (v2 August 2014 – Received 1 August 2014)
- Supporting Statement/Policy Appraisal (Amended v3 – Received 1 August 2014)
- Options Appraisal (July 2014) Document and Plan Ref RAC/6199/7 (Received 22 July 2014)
- Additional Information for Development Management Committee (Received 22 September 2014)
- Slurry Spreading and Water Pollution Management Plan (Received 22 September 2014)
- Line of Sight Diagram (RAC/6199/9) (Received 22 September 2014)
- Draft Landscaping Plan (RAC/6199/10) and Draft Landscaping Plan Cross-Sections (RAC/6199/11) (Received 22 September 2014)
- Additional Traffic Information (October 2014)
- Landscape Planting Strategy Plan (AJA 403/01) including photomontages of four viewpoints (a, B, C, D) produced by Anthony Jellard Associates (Received 18 November 2014)

Key Issues

The application raises the following planning matters:-

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- 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

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*

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

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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 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. The purpose of the guidance is to provide a detailed description and analysis of the special qualities of different areas within the National Park which the Authority will seek to conserve and enhance. Furthermore the guidance looks at management of the different areas and information from which to consider potential landscape harm.

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

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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.

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 large existing agricultural buildings thereby creating a closed block of four buildings as opposed to the current situation with three buildings. It is proposed to be finished in materials in dark green steel sheeting on the ends of the buildings, climate control curtains on the side and natural grey fibre cement roofing material with skylights. 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 a 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 and expansion, increase to a scale which would harm the special qualities of the National Park. Indeed the Authority's SPG 'Siting & Design of Farm Buildings' sets out

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that prominent sites including those near to public highways and public rights of way should be avoided.

It should be noted that 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 new additional building proposed would be located near to the site access and whilst set adjoining 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. This increase in the block size of the farm would represent a significant built form which will be visible both from the highway and the public right of way. 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.

Furthermore the new expanse of roofing would be visible in views from the east of the application site near St Nicholas as depicted in the applicant's viewpoint VP/3 as well as views from the public footpath near Velindre West looking back towards the farm itself.

In regard to other 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, particularly from the A road which runs through St Nicholas, which will resultantly have a detrimental 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 correspondence received through the course of the application that the lagoon proposed measures 110m long by 60m and follows the shape of the west field boundary in an irregular shape.

As members will be aware the applicant has now provided an amended landscaping scheme in addition to photomontages of the site shown as existing and 5 and 10 years periods after construction from four different

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viewpoints at locations around the site. The planting now proposed would form a new woodland area surrounding the slurry lagoon. This would comprise of a range of plant species planted in belts of 10-15m. The plants provided within the scheme are shown in the following table:

TREES AND SHRUBS	% OF Mix	SPECIFICATION	NOTES
Crataegus monogyna	37.5	450-600mm cell grown	Plant in random groups of 7-15
Salix caprea	15	450-600mm cell grown	Plant in random groups of 5-10
Prunus spinosa	12.5	450-600mm cell grown	Plant in random groups of 3-7
Salix cinerea	10	450-600mm cell grown	Plant in random groups of 3-7
Acer pseudoplatanus	10	450-600mm cell grown	Plant in random groups of 5 in centre of mix
Sorbus aucuparia	5	450-600mm cell grown	Plant in random groups of 3 in centre of mix
Quercus robur	5	450-600mm cell grown	Plant in random groups of 3 in centre of mix
Pinus nigra 'Maritima'	2.5	450-600mm pot grown	Plant as individual in centre of mix
Ilex aquifolium	2.5	450-600mm pot grown	Plant as individual in centre of mix

Table 1 - Planting Mix specified on Drawing AJA 403/01

Following receipt of revised landscaping scheme officers commissioned a report to be undertaken by Land Use Consultants on the landscape qualities of this area as well as consideration of the proposed landscaping scheme. This study is appended to this report for information purposes.

The report discusses the landscape proposals in relation to the slurry lagoon and advises in relation to the proposed siting that *"in this area there are very few trees, and hedgerows tend to be low and wind-blown"*. It is noted that there is a small but distinctive stand of wind-sculpted trees near Velindre West but otherwise woodland is restricted to scrub within the valley to the east of the farm. The report advises that this new landscaping is likely to be widely visible in the landscape similar to the small stand of trees at Velindre West.

It is explained that the species proposed are all native to the UK except Pinus nigra (black pine) which is present in the UK but native to the Mediterranean region. Queries are raised about the appropriateness of some species; however, in general the scheme would prove appropriate for the location. Comments are made about the fact that being in an exposed location it is likely that the smaller scrub species will be more successful whilst larger trees will be less likely to reach their full height. It is advised that the photomontage for viewpoint A is not especially helpful given that it is taken in the sun making it difficult to make out the proposal, despite its proximity. It is mentioned that

this is a key viewpoint from the public footpath closest to the lagoon and highlights the likely visibility of the lagoon which will be particularly apparent during construction work and, as depicted, up to five years post construction. Members will recall this key viewpoint from the site inspection.

The report concludes that if properly implemented and managed, the proposed planting at the slurry lagoon, is likely to provide, in time, screening of the development. However it also advises that this will not become apparent for several years as the planting will take time to mature. It also confirms that the screen planting will eventually become a 'feature in views' of this area forming a 'punctuation point'. The wider test mentioned, however, apart from simply screening the slurry lagoon is the principle of the development in this location and whether this is the most appropriate site for such an installation. With particular reference to LDP Policy 15 the report identifies that the landscape proposals may mitigate criterion (a) of Policy 15 which relates to 'significant visual intrusion', however in the view of the Land Use Consultants the development would not satisfy criteria (b), (c) and (d) of Policy 15 as being unsympathetically sited, not being compatible with its location and failing to enhance the landscape character of the area. In view of the findings it is considered relevant to set out why the development on a whole will not comply with the relevant policies of LDP.

Policy 8 (Special Qualities)

This policy sets out the special qualities of the National Park which will be protected and enhanced. It provides priorities and one of which is to ensure that (a) The sense of remoteness and tranquillity is not lost and is wherever possible enhanced. The development of the new building will not harm remoteness, however, the building in combination with the slurry lagoon will harm the remoteness and tranquillity of the surrounding landscape. The landscape comprises unspoilt fields and low hedgerow features. Whilst screening, which would take a number of years to take effect would help screen the actual physical lagoon the development will upset the existing remoteness and tranquillity of the site which is near the public right of way. There is a clear pattern of landscape in the area and the development will not protect or where possible enhance this contrary to criterion (c) which requires that the pattern and diversity of the landscape is protected and enhanced.

Policy 15 (Conservation of the Pembrokeshire Coast National Park)

This policy is provided to ensure that the qualities of the National Park landscape are not lost to future generations. It can be accepted that the lagoon itself, after extensive screening, will not cause a 'significant' visual intrusion in accordance with criterion (a), however, there is a further policy consideration about siting within the landscape (criterion b), the use in regard to its location (criterion c), harmonising with the landform and landscape (criterion d) and incorporation of important traditional features (criterion e).

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(b) being insensitively and unsympathetically sited within the landscape

It is considered that the siting of the slurry lagoon in combination with the expanse of the existing farm complex will result in more visual emphasis placed on the farm complex and land to the west at which the slurry lagoon is proposed. The development is considered to be insensitively and unsympathetically sited within the landscape contrary to the policy requirement of criterion (b). Whilst screening can take place, this screening itself will provide a new visual emphasis and punctuation point in the landscape. The site is very prominent, as existing, and any marked change in the landscape contours and form of landscaping is likely to change the landscape character. The lagoon will remain prominent from the public footpath near the site for a number of years following construction.

(c) introducing or intensifying a use which is incompatible with its location

The development will provide a new building alongside existing structures near the farm yard and a slurry lagoon on a very prominent field location within the National Park and in proximity to the coastal path. Whilst the proposed building will be compatible with its location as part of Velindre Farm complex it cannot be held that a slurry lagoon is an appropriate or compatible development in the location proposed. The purposes of the National Park are to 'conserve or enhance' the natural beauty, wildlife and cultural heritage' and the public understanding and enjoyment of those qualities. The introduction of a slurry lagoon for purposes of storing animal waste in connection with the farming operation will not 'conserve or enhance' the existing beauty, wildlife or cultural heritage of the Park particularly the sense of openness and tranquillity provided within the field which is very near the public right of way and coast path. Furthermore the slurry lagoon is proposed to be positioned near two existing residences. As such it cannot be held that the location of the slurry lagoon is compatible with its location and the scheme fails to comply with this criterion.

(d) failing to harmonise with, or enhance the landform and landscape character of the National Park

Whilst the additional planting proposed will help support biodiversity in the area the purpose of the planting is to effectively screen the slurry lagoon from views. The lagoon will not harmonise with or enhance the landform and landscape character of the National Park. Although, for the reasons already set out, it may be shielded

Policy 29 – Sustainable Design

This policy requires all proposals to be expected to demonstrate an integrated approach to design and construction and will be required to be well designed

in terms of (a) place and distinctiveness, (b) environment and biodiversity, (c) community and cohesion and health, (d) accessibility, (e) energy use, (f) energy generation, (g) materials and resources, (h) water and drainage, (i) waste and (j) resilience to climate change. For the reasons set out above, and in consideration of the detailed policies, it cannot be held that the development is well designed in terms of place and local distinctiveness.

Policy 30 – Amenity

Although this policy is directly related to amenity impacts and particularly those impacts upon neighbouring occupiers, which is considered in more detail in separate paragraphs, there is a need to consider whether the development is of a scale compatible with its surroundings (criterion b) and whether it is visually intrusive (d). The slurry lagoon proposed is a substantial installation amounting to a volume of 14,800m³. The lagoon will measure approximately 110m long by 60m and it is not considered to be of a scale 'compatible' with its surroundings contrary to criterion (b). Furthermore the slurry lagoon itself will be a visually intrusive installation in the landscape which will impact upon visual amenity and contrary to criterion (d).

Having regard to all material considerations and going back to the key question about whether the development will 'conserve or enhance' the character and appearance of the National Park it can be determined that the additional woodland planting will help aid and potentially shield some views of the slurry lagoon and potentially most long distance views of it over time. However, as can be seen in the photomontages, due to the topography and orientation of the land, and its current unspoilt nature, the lagoon and the woodland planting in combination with an additional building at the site will have a cumulative effect of harmfully affecting and changing the landscape character of this part of the National Park. It cannot be held that this development would complement or enhance the natural, beauty, wildlife and cultural heritage and the public understanding and enjoyment of those qualities. A slurry lagoon, a man-made substantial engineering operation up to 4.5m deep, and associated screening will neither conserve nor enhance the qualities that the National Park is widely acclaimed for having and protecting (Policy 8 refers).

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 development will alter the well-defined field pattern which is made reference to as being a special quality in the Landscape Character Assessment SPG. 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 raised whilst there may have been a case for additional mitigation, the mitigation provided does not protect the special

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qualities of the National Park. The development would remain part of the landscape for many future years and is against the principles of the Local Development Plan and the requirement to conserve or enhancing the special qualities of the National Park.

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 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). Furthermore consideration has been given to the detailed descriptions and analysis set out in the Landscape Character Assessment for Trefin (LCA 20) and the harm this development will have on the special qualities of the area.

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.

Following discrepancies in information relating to highway movements presented in the original application submission the applicant provided additional traffic information in a report (October 2014). Details provided by way of tables within the report show 'existing' traffic movements at Velindre Farm in addition to 'proposed' traffic movements as a result of the development.

- Existing movements at the site amount to 6,348 movements per year and this includes HGV movements (791), Tractor and Trailer Movements (which includes contractors) (1,899) and Car and LGV movements (3,658)
- Proposed movements at the site amount to 7,082 movements per year and this includes HGV movements (853), Tractor and Trailer Movements (which includes contractors) (2,051) and Car and LGV movements (4,178).

The Highway Authority provided an amended consultation response dated 16 October 2014 which commented on the information provided by the applicant in the new report. Their response advises:

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“Further to the original response to this application, queries were raised regarding trip generation as a result of this proposal.

The traffic volume and potential increase are relatively low for this application however their presentation of the information can come across as confusing. Clearly objectors have questioned the figures but even if one was to use the objectors figures, the potential daily traffic increase is still relatively low.

The information has been shown as annual traffic flows and whilst as part of our considerations we were able to carry out analysis based on this, an annual traffic generation does not enable residents to gauge potential impact and it is more useful for the applicant to show figures of traffic movements at peak times i.e. identify their busiest periods, e.g. harvest/slurry spreading, and estimate how much traffic this will generate over a typical working day and hour of that day. This will give a better indication of actual direct impact to residents.

The applicant’s agent has now provided further information along the lines described which indicates that a peak of 4.6 vehicles for forage over an hour which is an increase of 1.7 vehicles per hour. The peak hour for slurry is shown as 7.4 vehicles which is suggested as remaining static over the original figures. Whilst it is accepted that it is difficult to assess accurately to the hour the likely impact of this development, this estimate of peak traffic generation appears reasonable and is at a level where actual traffic numbers would not raise capacity issues.

Whilst capacity is not considered an issue it would be beneficial if a contractor/traffic management plan was developed to show how traffic is to be controlled to avoid excessive peaks in vehicular movements at any one time, e.g. avoid carrying silage whilst moving slurry, accept deliveries on days when other activities are quiet as far as is practical and so on.

The LHA is still of the opinion that some of the existing grass verges which are used for passing places could be surfaced to provide safer passing places, this would not require any impact on existing hedge lines.”

The Highway Authority outlines no objection to the application and reiterates their conditions suggested in their response of 7 July 2014 which include:

- Visibility splays to be provided;
- No growth or obstruction to visibility above 0.6m;
- Detailed plans for 3 passing places; and;
- Surfacing of access tracks.

Additional conditions to allow for mitigation of some concerns raised are also requested to deal with:

- minor road widening within the existing verges; and

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- traffic management plan to deal with and manage excessive demand on the highway within the interests of highway safety.

Officers have no reason to disagree with the conclusions reached by the Highway Authority in that whilst there will be an overall increase in yearly vehicle movements at the site this would not be at a level which would adversely impact upon highway safety or result in traffic problems in the area. The site is an existing working farm and whilst the concerns of the local residents are noted suitable conditions to deal with highway matters as well as providing for a traffic management scheme and some additional verge surfacing would assist and deal adequately with these concerns. As such the development would comply with the aims of policies 52 and 53 of the LDP notwithstanding the unacceptability of the scheme on other grounds.

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

The Authority consulted Pembrokeshire County Council’s Environmental Health Section as part of the application. Environmental Health Officers advised of no objection to the application and explained that the proposed lagoon has been designed to comply with the relevant legislation/guidance. Natural Resources Wales have 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’.

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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 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 data that I have shared with you will put to bed the fictitious and unfounded statements that have been made"

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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; and;
- (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 screen banking which now includes proposals for a woodland area it would remain that the lagoon is likely to be visible from the property Velindre West, particularly its upper floor windows which look directly towards the site, as well as 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 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, albeit to be screened with a woodland area, 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.

In relation to criterion (c) whilst there will be odour from the slurry lagoon and this may emanate in the area and near existing residences in view of the fact that there is no objection on potential noise or odour nuisance 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

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such the development fails to comply with the requirements of policy 30 (criteria a, b and d).

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 Penysgwarne 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 from the applicant 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 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 initial consultation Natural Resources Wales, the relevant Authority for slurry storage and water management matters confirmed no

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objection to the proposal provided that the new slurry is designed to meet the above mentioned Regulations. However they noted the intention to utilise a clay liner for the earth bank lagoon and requested that a copy of the clay content analysis results be submitted for their records and the planning file. The details have been provided and NRW raise no objection to the analysis carried out.

On receipt of the additional information produced by the applicant (Slurry Spreading and Water Pollution Management Plan September 2014) NRW further advised that they had no grounds to disagree with the figures for nitrogen level calculations outlined in the report. The figures in the report show that 394 Ha5 are required as a minimum spreading area. In relation to the farm land block and satellite farms the applicant has 411 ha of land available of which 403 ha is suitable for spreading. As such based on the advice received from NRW and the plan produced there is considered to be suitable land to spread slurry arising from the operation.

In view of the comments received from NRW 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 any habitat or species as a result of development. As such a protected species survey or habitat survey has 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

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blowing emissions arising from spreading on 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 Ecologist 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 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 to 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 must 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. Planning Policy Wales (Edition 7, July 2014) Chapter 7 advises at paragraph 7.6.5 that *“Local planning authorises 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 employed to 11 staff and there would be further temporary benefits during the construction period.

The support of the proposal from NFU is noted particularly in relation to the importance of the farming industry in general and the need for investment and modernisation in farming to meet increasing economic, environmental and animal welfare demands. The Authority recognises that agriculture is an important industry in the National Park which has a central role in shaping management of its landscape. Indeed the SPG ‘Siting and Design of Farm Buildings’ advises (para 1.2) *“The National Park Authority will adopt a constructive approach towards agricultural development proposals, and will foster a spirit of partnership with the farming community in pursuit of a sustainable future.”* The Authority also recognises that changes in practices will result in changing development at farm holdings; however, this should not be to the detriment of the key purposes of the National Park at conserving or enhancing the natural beauty, wildlife and cultural heritage of the Park and also the public understanding of those qualities.

However, the economic benefits of this proposal should not be overstated. In particular there is no evidence to support the assertion that this development is necessary for the continued operation of the farm. No financial or other information has been submitted which supports that assertion, which has been made on several occasions during the consideration of the application to date and it would appear to be overstating it to suggest that the farm would not survive absent approval of this application. On that basis, the economic benefit appears to be limited to an increase in profitability of the farm and the creation of employment benefits, together with some temporary benefits during construction..

Whilst the increase in profitability and the creation of employment and other benefits is a material consideration in applications for planning permission these benefits must be weighed in the balance of all material planning considerations. 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 increased profitability and the creation of a single additional full time job and some temporary benefits during construction of this scheme.

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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 increased profitability of the farm, 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 harm 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 and profitability of the farm. However, the benefits of the scheme should not be overstated and 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.

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.

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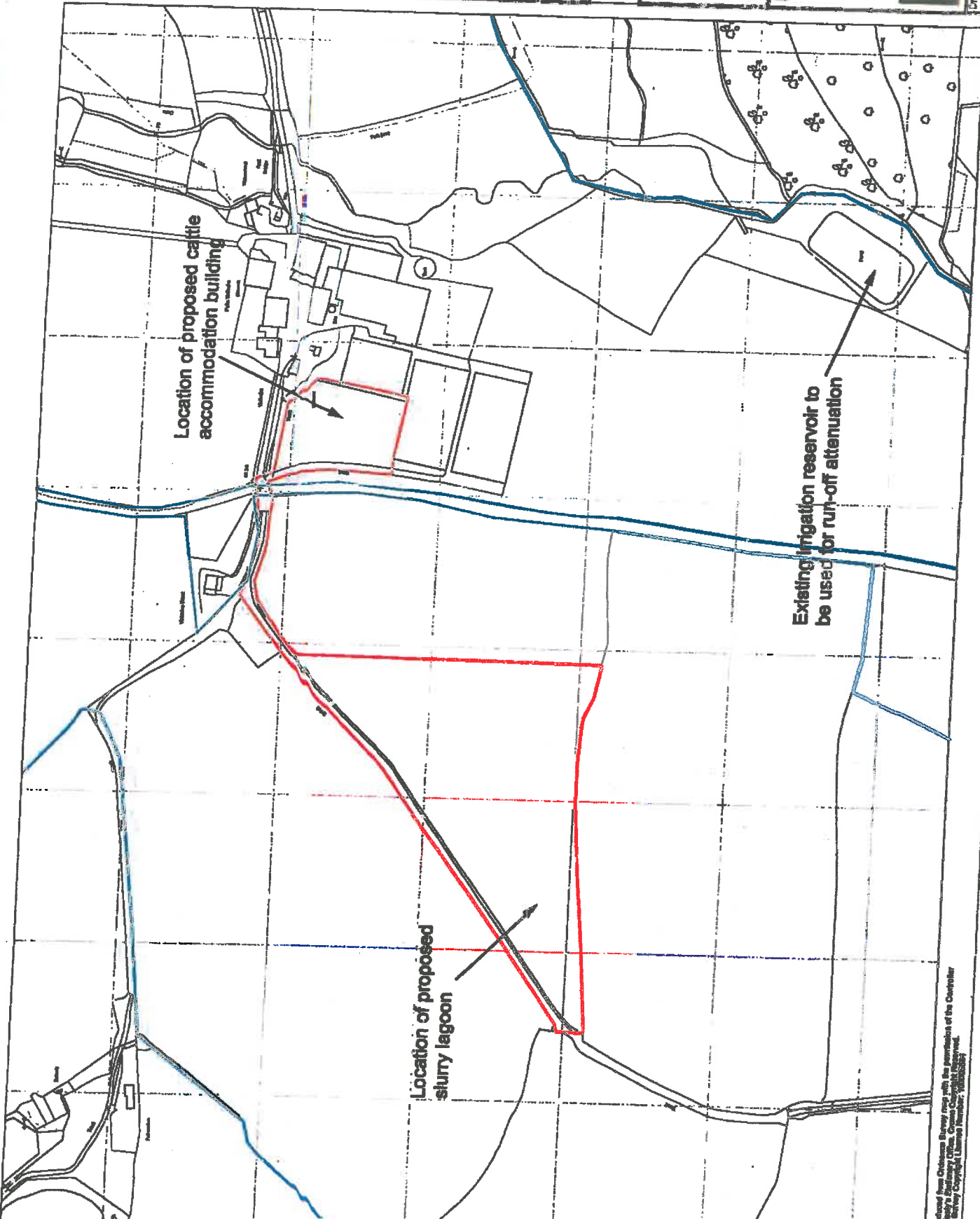
DATE	10 JULY 2014
REVISION	
MK	

DRAWING TITLE	LOCATION PLAN
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CONTRACT	MR D HARRIES VELINDRE FARM ST NICHOLAS PEMBROKESHIRE SA64 0LJ
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Reading Agricultural Consultants Ltd
 Glass House
 Beechwood Court
 Long Tail
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Drawn	AL	Checked	AL
Scale	1:2,500 @ A3	Date	10 July 2014
Rev		Rev	RAC/6198/1



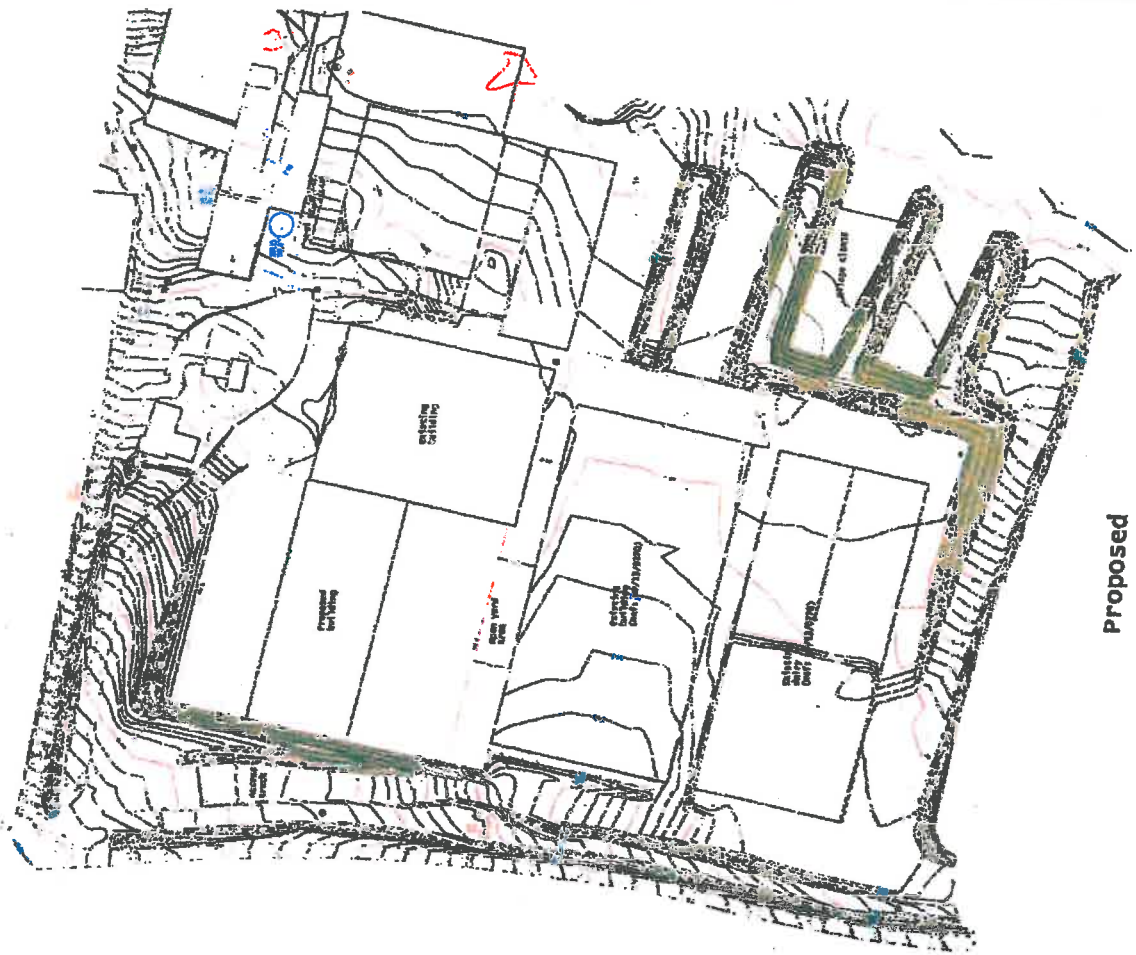
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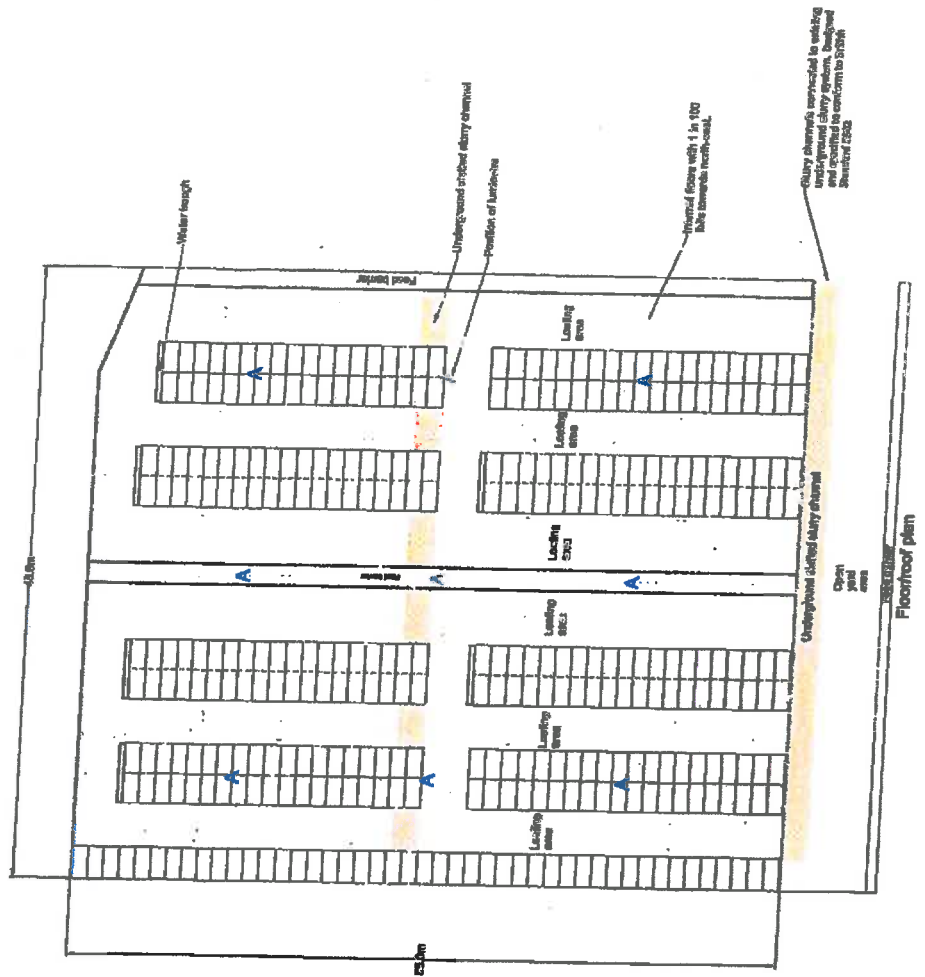
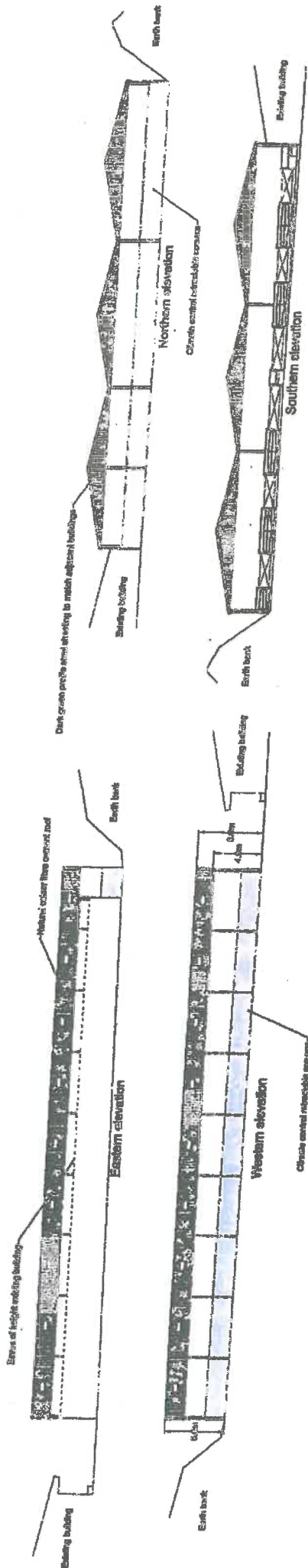
CATTLE ACCOMMODATION - EXISTING AND PROPOSED SITE PLAN	
CONTRACT	
MR D HARRIES VELINDRE FARM ST NICHOLAS WINDSORSHIRE SL4 6LJ	
Planning Application Number: 11/0140 Date of issue: 11/01/11 Date of completion: 11/01/11 By: [Signature] For: [Signature]	
[Stamp]	
[Stamp]	



Proposed



Existing



NP 14 3 1 10 2000 2004

Full details of formwork to be used in supporting element

Scale: 1:100

DATE: 10/10/04

PROJECT: NP 14 3 1

CLIENT: MR D HARRIS, VELVINE FARM, ST NICHOLAS, PIERREBOURNE, SA44 0LJ

CONTRACTOR: Teaching Agricultural Consultants Ltd

PROJECT NO: 14/03/01

DATE: 10/10/04

SCALE: 1:100

PROJECT: NP 14 3 1

Floor/roof plan

14 15

1:1000

N

SLURRY LAGOON-EXISTING SITE PLAN

PROJECT: MR D HARRIS, VELAIRE FARM, ST NICKOLAS, PENRICKESHIRE, SAHA PLJ

Client: Reading Agricultural Consultants Ltd

Scale: 1:1000

Date: 14/15

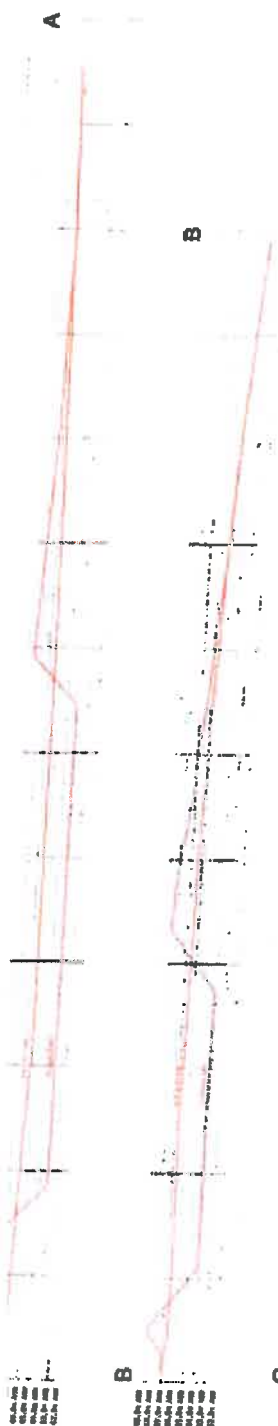
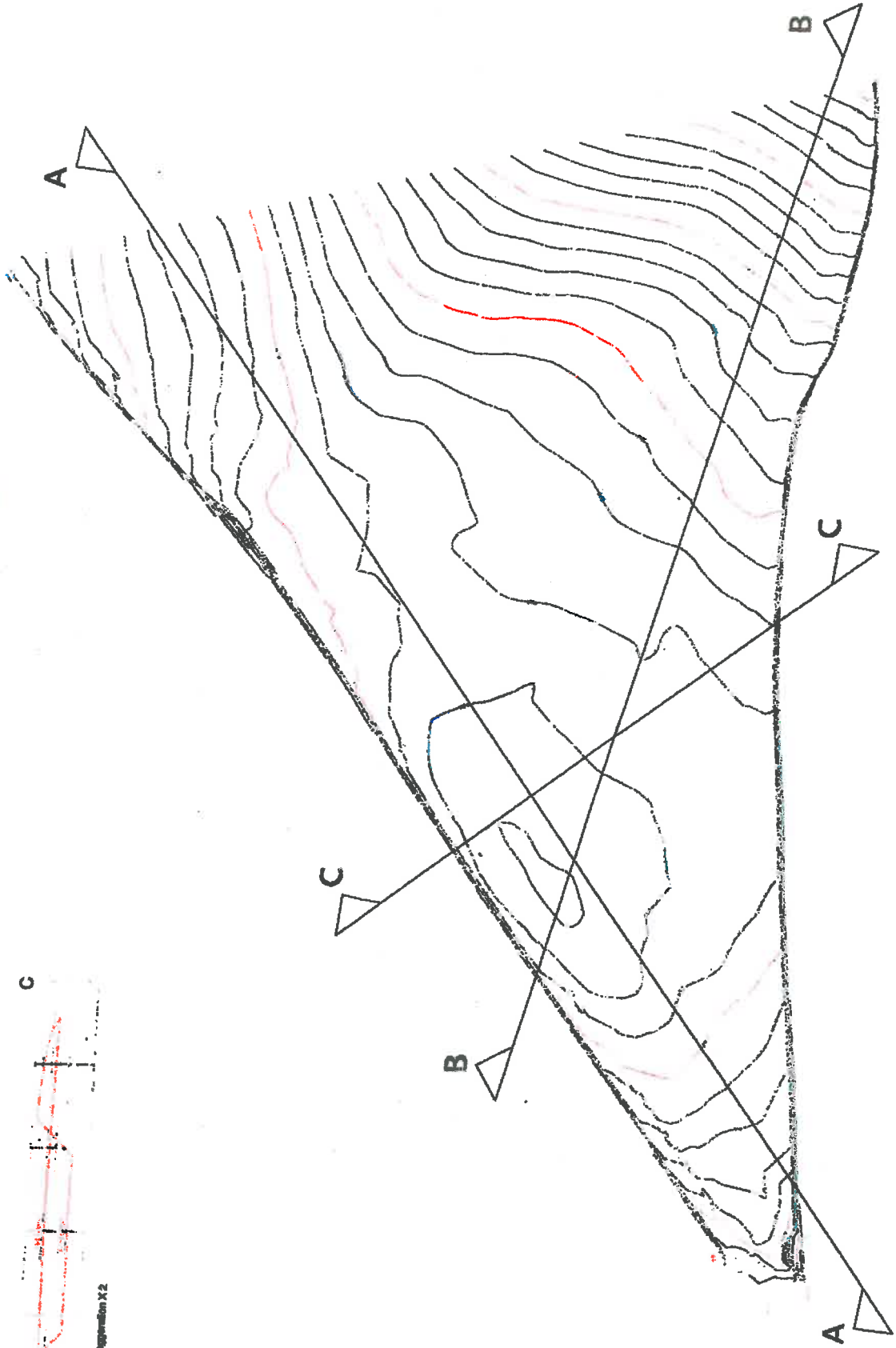
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Drawn: [Signature]

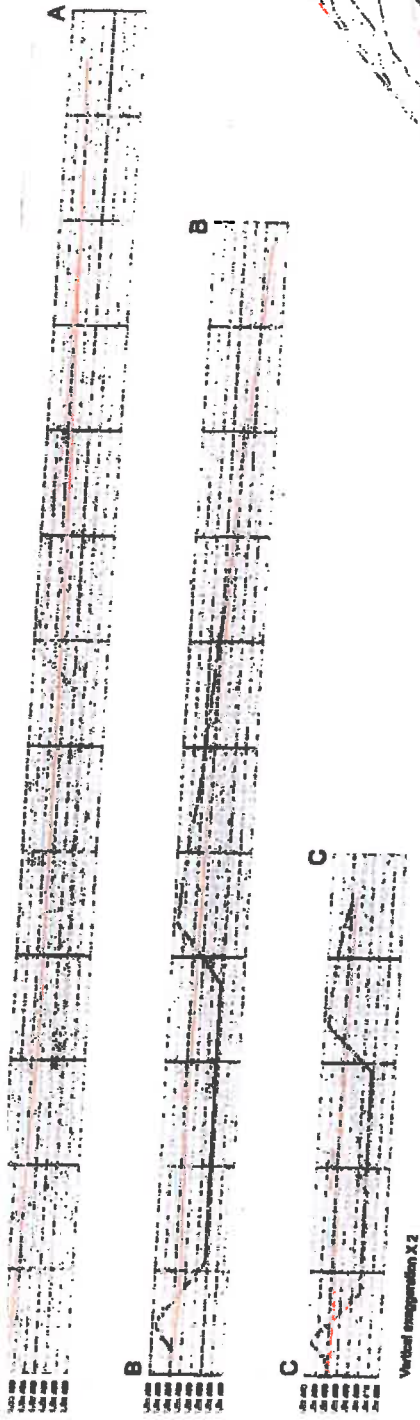
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Vertical magnification X2

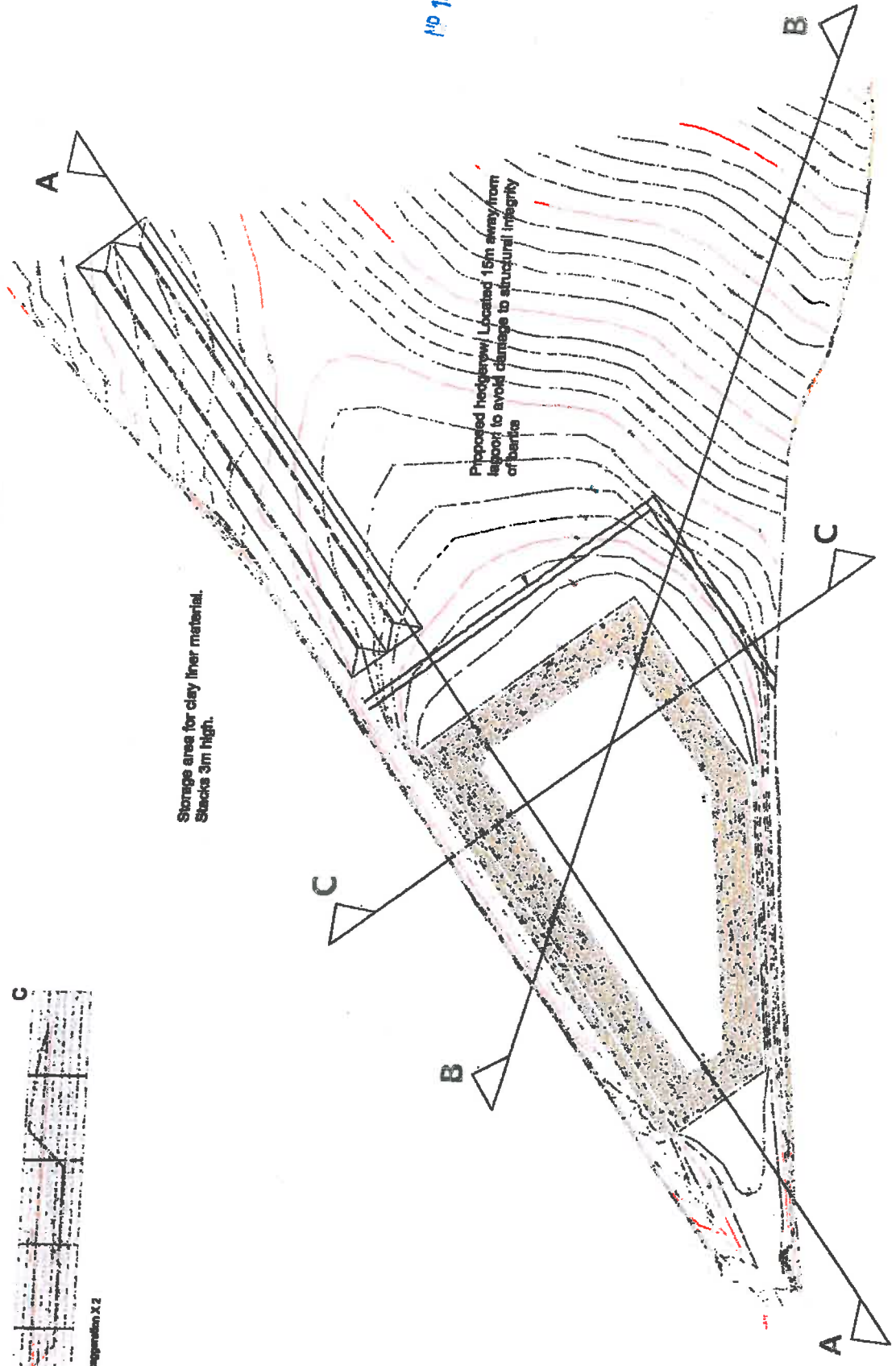
MD 14 3 11



Vertical magnification X 2

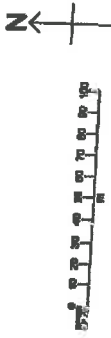
Storage area for clay liner material.
Stacks 3m high.

Proposed hedgerow located 15m away from
lagoon to avoid damage to structural integrity
of barriers



<p>Scale: 1:1000</p> <p>North Arrow</p>	
<p>Legend:</p> <ul style="list-style-type: none"> □ Existing structure △ Clay liner storage area 	
<p>DATE: 14/3/11</p>	
<p>SLURRY LAGOON - PROPOSED SITE PLAN</p>	
<p>CLIENT:</p> <p>MR D HARRISON VELINDRE FARM BT NICHOLAS PENROCKCHURCH SN84 0LJ</p>	
<p>DESIGNER:</p> <p>Planning Department Environment 14, Street Level 1, 201 New Street, Bristol 0117 927 2000 www.bristol.gov.uk</p>	
<p>NO. 15</p>	<p>PROJECT NO. 102700</p>

Printed on 22 July 2014
22 JUL 2014



MK	REVISION	DATE

DRAWING TITLE
TEMPORARY SLURRY PIPELINE PLAN

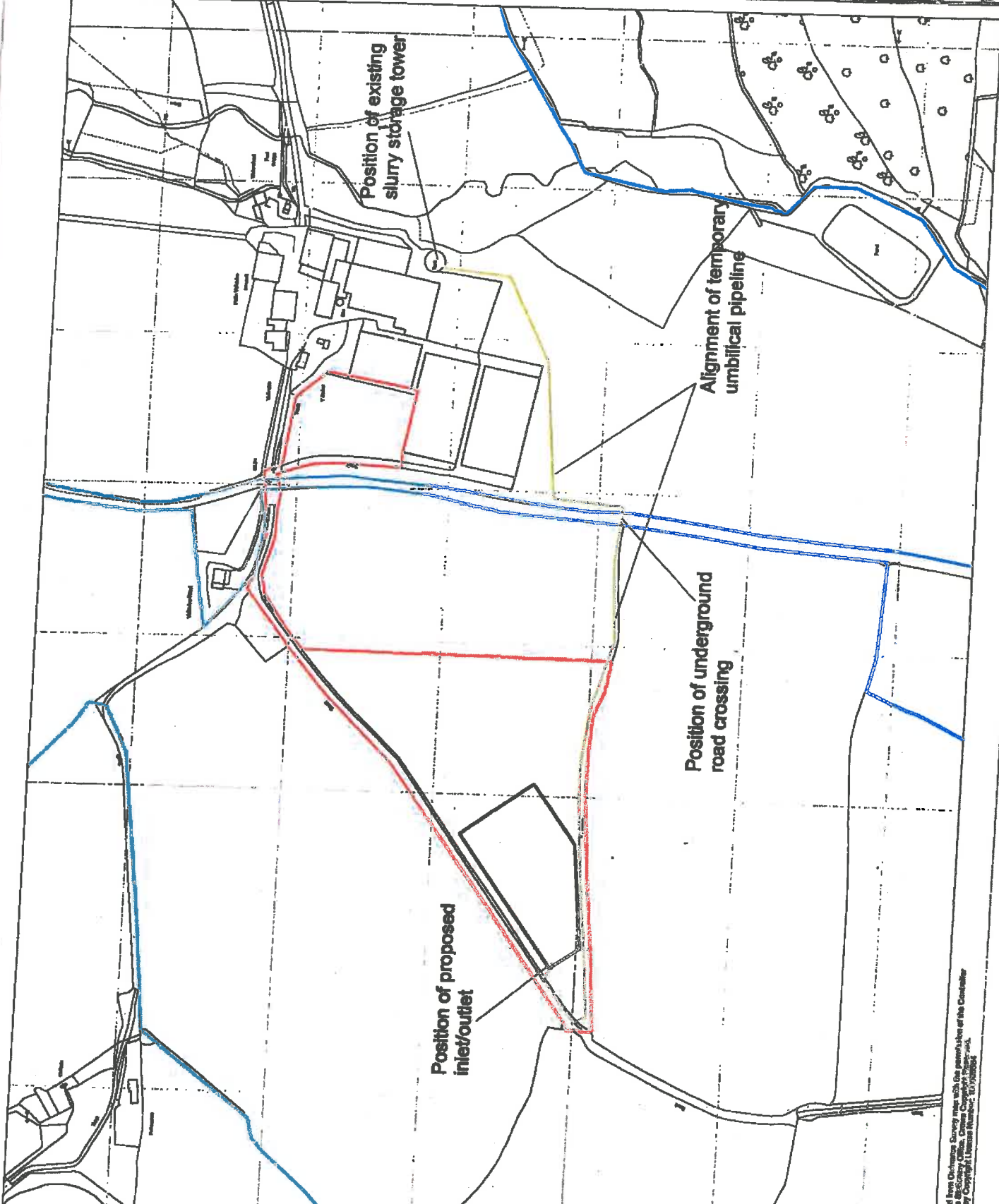
CONTRACT
**MR D HARRIES
VELINDRE FARM
ST NICHOLAS
PEMBROKESHIRE SA64 0LJ**

Reading Agricultural Consultants Ltd
Gate House
Beechwood Court
Long Toll
Woodcote
RGS ORR
Tel: 01491 684233 Fax: 01491 680900
www.readingaggricultural.co.uk



Drawn	AL	Date	12.000@AS July 2014
Checked			
Scale			
Rev.			

RAC/6199/8



Position of existing slurry storage tower

Alignment of temporary umbilical pipeline

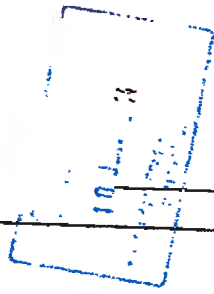
Position of underground road crossing

Position of proposed inlet/outlet

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14 3 19

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



DATE	REVISION	MK

DRAWING TITLE

HOLDING PLAN

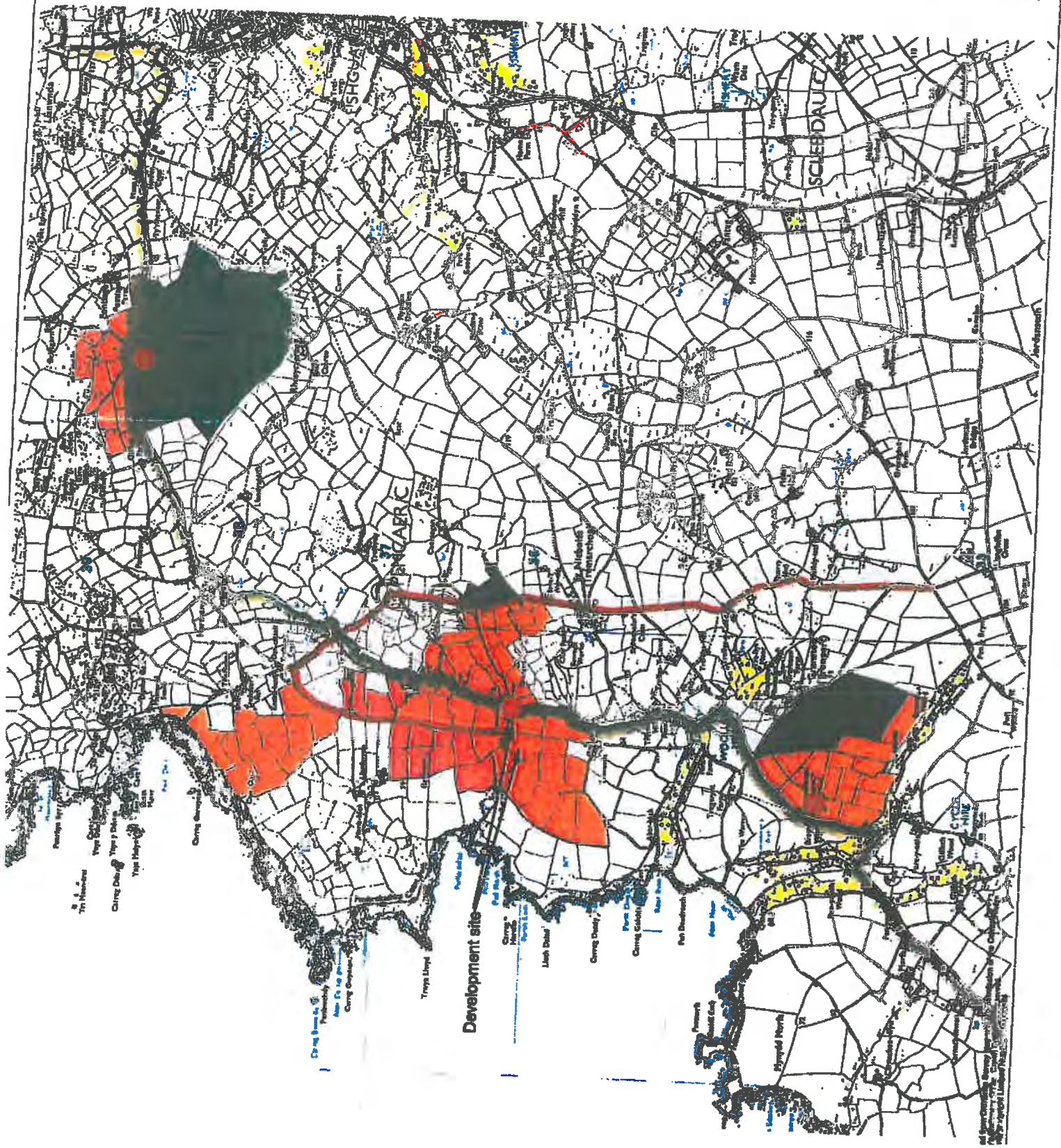
CONTRACT

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Drawn	Checked	Rev.
AL	PWD	RAC/6189/6
Scale	Date	May 2014
N.T.B.		



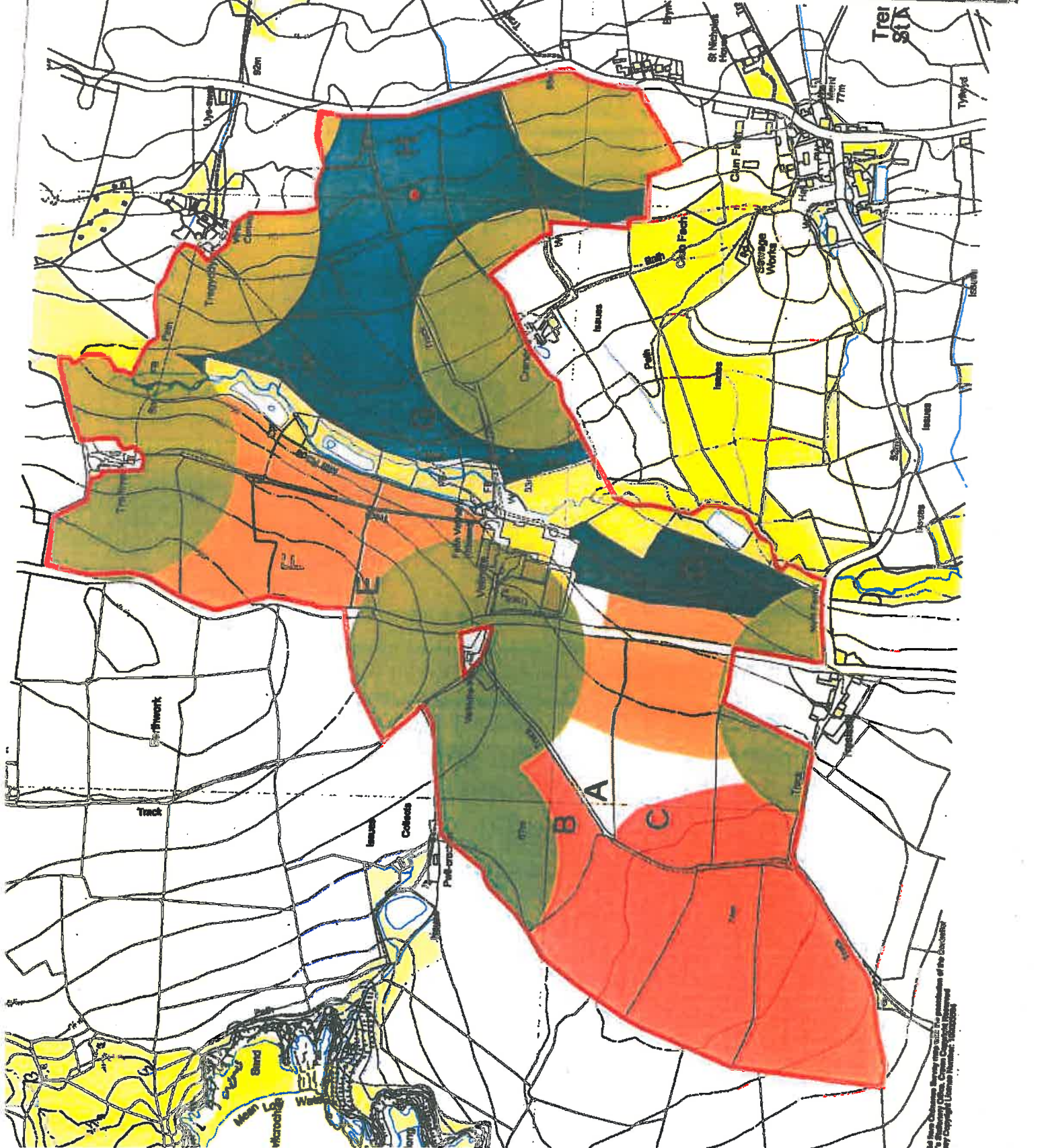
<200m of dwelling	Landscape/visibility restriction	Gradient restriction	Groundwater restriction	A Site assessed (see accompanying Options Appraisal)
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22 JUL. 2014

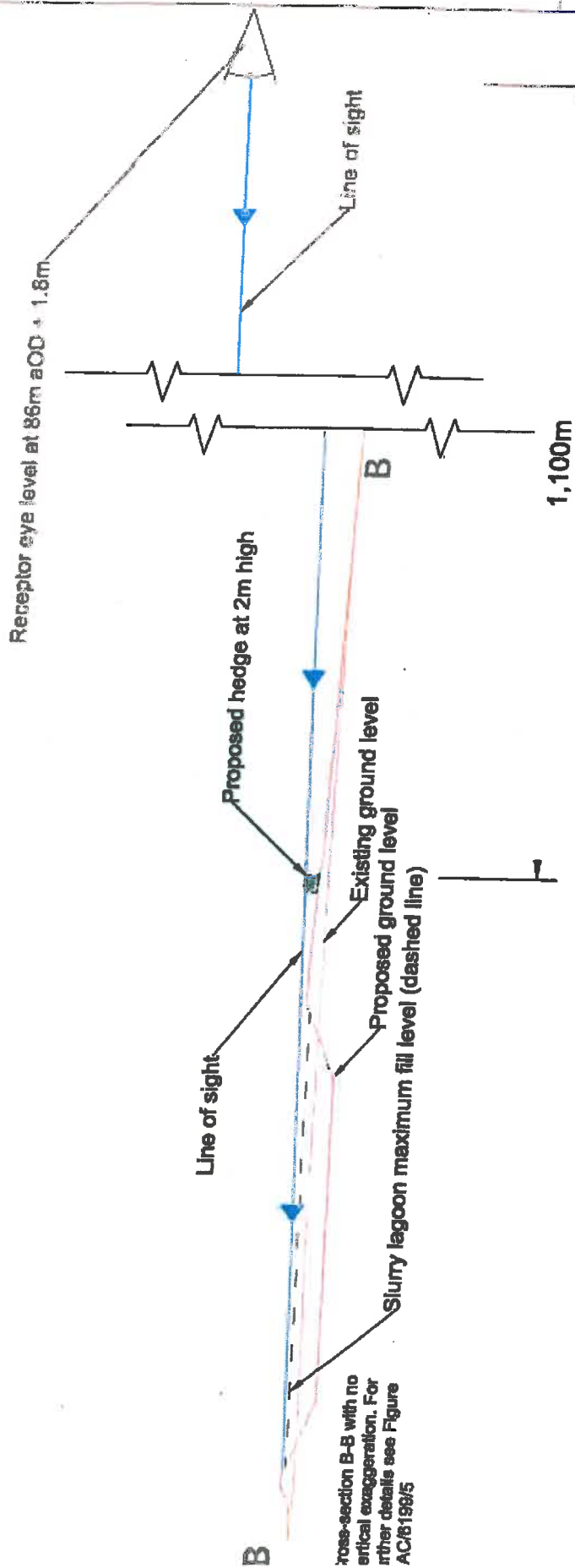
Reading Agricultural Consultants

DRIVING TITLE	REVISION	DATE
OPTIONS APPRAISAL		
CONTRACT		
MR D HARRIES VELINDRE FARM ST NICHOLAS PEMBROKESHIRE SA64 0LJ		
Reading Agricultural Consultants Ltd Gate House Beechwood Court Long Toll Woodcote RG8 0RR Tel: 01491 884233 Fax: 01491 888800 www.readingagricultural.co.uk		

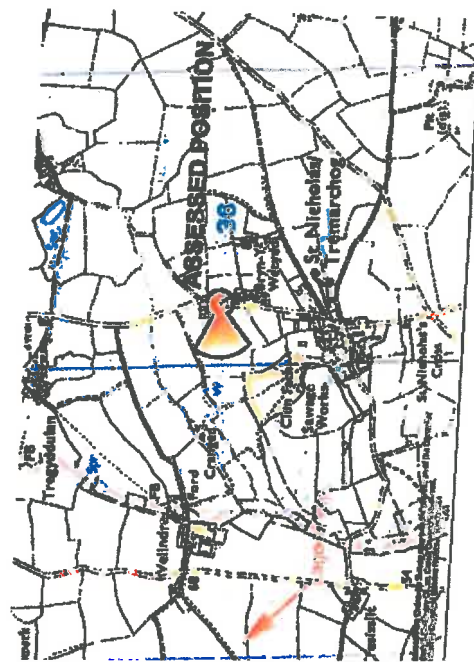
Drawn	CH. J.	PLWD	Rev.
Scale	N.T.S.	Date	
RAC/6199/7		July 2014	



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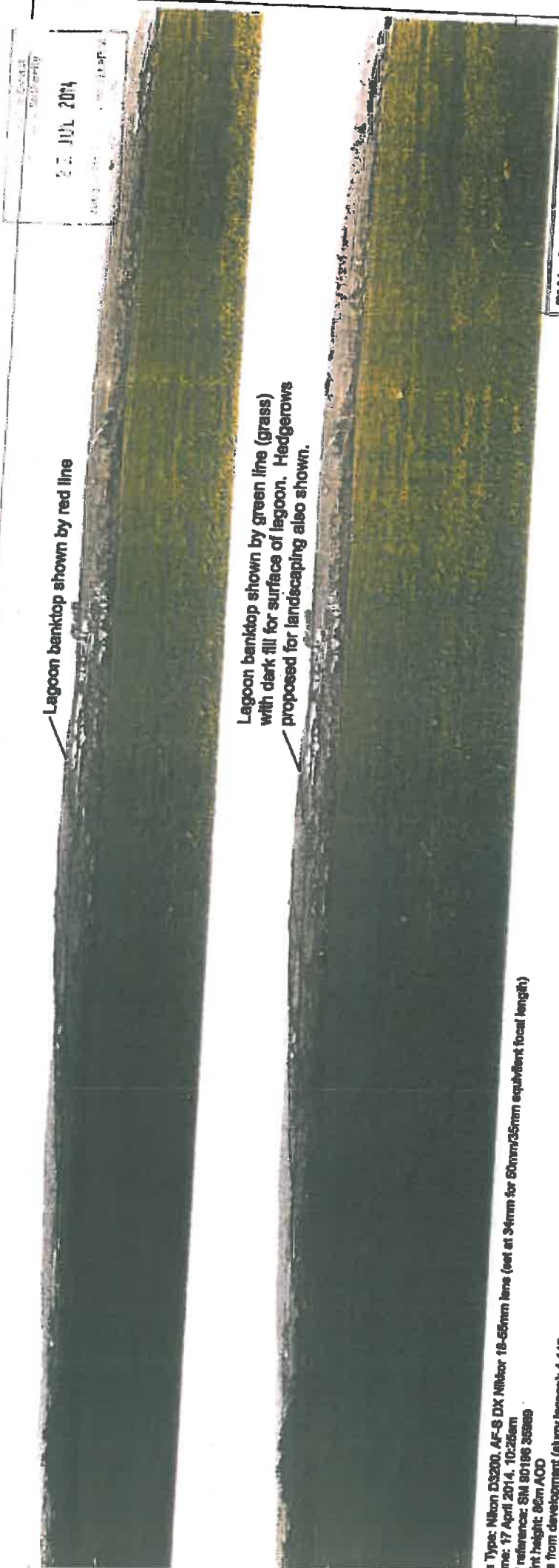


cross-section B-B with no
artificial exaggeration. For
further details see Figure
AC/6198/5



MR	MP/MS/EN	A/T
DRAWING TITLE		
LINE OF SIGHT DIAGRAM		
CONTRACT		
MR D HARRIES VELINDRE FARM ST NICHOLAS PEMBROKESHIRE SA84 6LJ		
Reaching Agricultural Consultants Ltd Dale House Brewerwood Court Long Trill Vincennes Llanelli SA71 3YR Tel: 01462 844333 Fax: 01462 88000 www.reaching-agricultural.co.uk		
Other	AL	PWD
15/06/2014	15/06/2014	15/06/2014
No: RAC/6198/5		

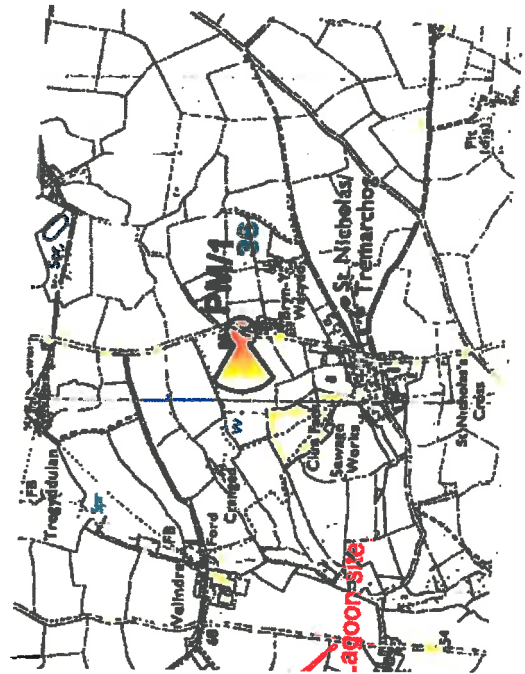
11.11.2014



Lagoon banktop shown by red line

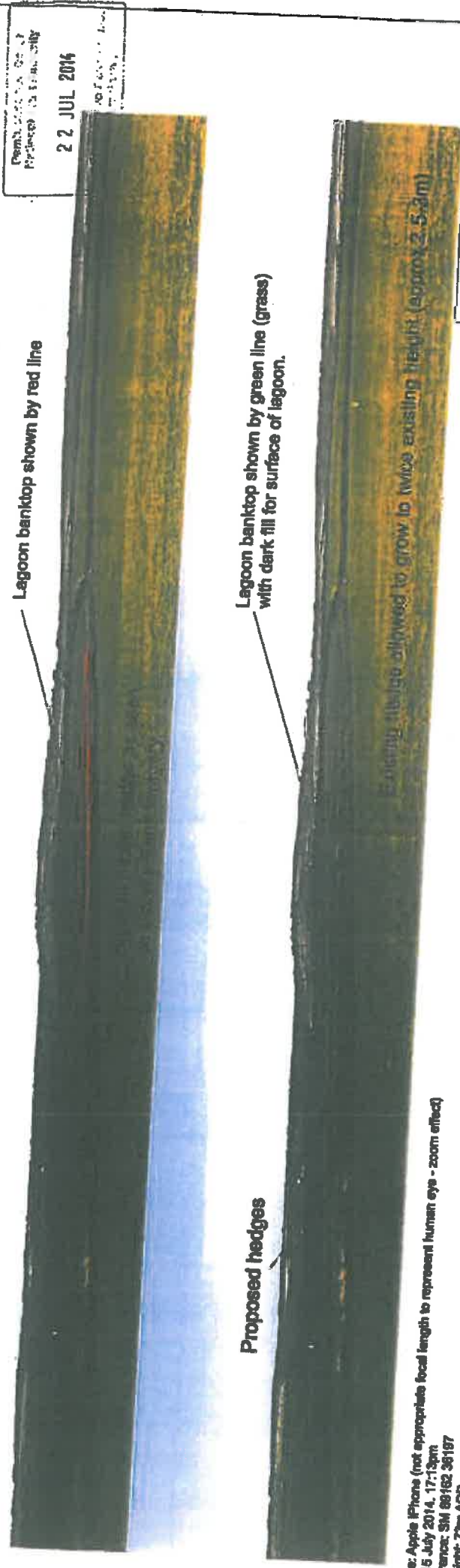
Lagoon banktop shown by green line (grass) with dark fill for surface of lagoon. Hedgerows proposed for landscaping also shown.

Type: Nikon D5200, AF-S DX Nikkor 18-55mm lens (set at 34mm for 60mm/35mm equivalent focal length)
 Date: 17 April 2014, 10:25am
 Reference: SA 20196 30869
 Altitude: 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	
Reading Agricultural Consultants Ltd Gate House Beechwood Court Long Toll Woodcote RG8 0PR Tel: 01492 884233 Fax: 01492 880800 www.readingagricultural.co.uk	
Drawing No. AL	Date FWD
Scales N.T.S.	Date July 2014
Rev. RAC/6198/PM1/1	

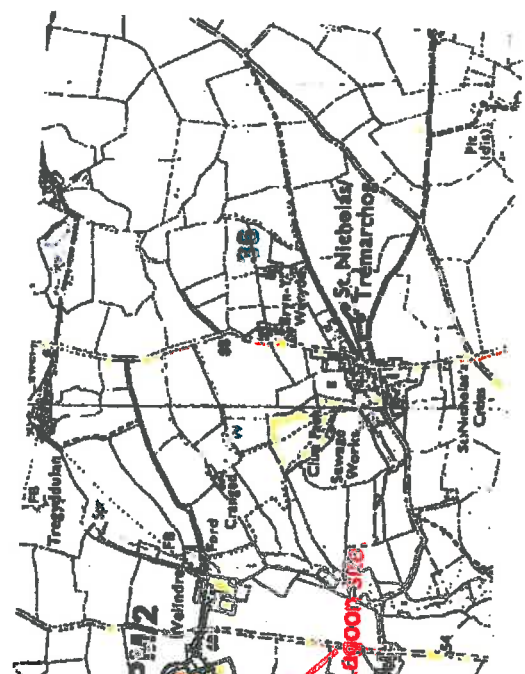


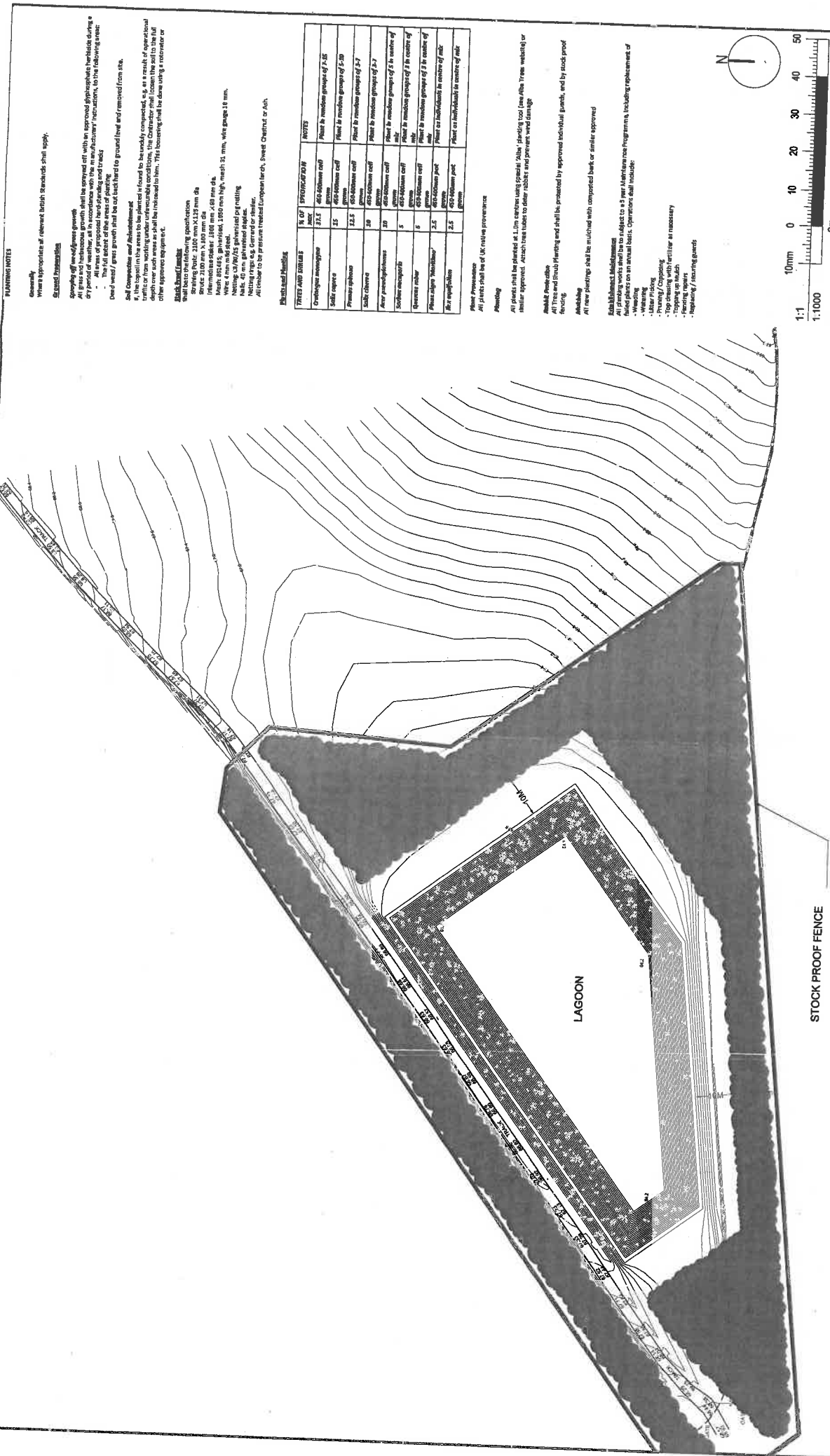


2 2 JUL 2014

on Type: Apple iPhone (not appropriate focal length to represent human eye - zoom effect)
 Time: 16 July 2014, 17:13pm
 id reference: SM 89182 36187
 and height: 73m AOD
 ze from development (plumy lagoon): 250m

DRAWING TITLE	
PM2 - BEFORE/AFTER PHOTOMONTAGE OF SITE FOOTPATH NORTH OF LAGOON	
CONTRACT	
MR D HARRIES VELINDRE FARM ST NICHOLAS PEMBROKESHIRE SA84 0LJ	
Reading Agricultural Consultants Ltd Gann House Beachwood Court Lang Tail Woodcote RGS ORR Tel: 01491 684233 Fax: 01491 680000 www.readingagricultural.co.uk	
Drawn	AL
Checked	AL
Scale	N.T.S.
Date	July 2014
Rev.	RAC/189/PM2





PLANTING NOTES

General
 Where appropriate relevant British Standards shall apply.

General Installation
 All plants and landscape growth shall be carried out with an approved appropriate herbicide during a dry period of weather, in accordance with the manufacturer's instructions, to the following areas:
 - The full length of proposed hard-standing and tracks
 - The full length of proposed paths and tracks
 - The full length of proposed parking areas
 Dead weed/ grass growth shall be cut back to ground level and removed from site.

Soil Compaction and Subsoiling
 If the topsoil in the areas to be planted is found to be heavily compacted, e.g. as a result of operational traffic or from working under unfavourable conditions, the contractor shall be required to subsoil the full length of the area to be planted to a depth of 150mm below the subsoil depth of the subsoiling equipment.

Plant and Materials
 All plants shall be of UK native provenance.
 All plants shall be planted at 1.0m centres using plastic 150mm x 150mm x 100mm (see also Tree Schedule) or similar approved. Attach tree tubes to other rabbits and prevent wind damage.
 All trees and shrub planting shall be protected by approved individual guards, and by stock proof fencing.
 All new plantings shall be mulched with composted bark or similar approved.
 All plants shall be subject to a 3 year maintenance programme, including replacement of failed plants on an annual basis. Operation shall include:
 - Weeding
 - Watering
 - Pruning/Trimming
 - Top dressing with fertilizer if necessary
 - Topping or lopping
 - Replanting / securing guards

TREE AND SHRUB	% OF SPECIFICATION	NOTES
Cornus sanguinea	2.5	Plant in random groups of 2-3
Sedum spectabile	2.5	Plant in random groups of 2-3
Prunella sp.	2.5	Plant in random groups of 2-3
Salix chrysantha	2.5	Plant in random groups of 2-3
Acer pseudoplatanus	2.5	Plant in random groups of 2-3
Sorbus aucuparia	2.5	Plant in random groups of 2 in centre of
Quercus robur	2.5	Plant in random groups of 2 in centre of
Plantago lanceolata	2.5	Plant on individuals in centre of site
Stachys recta	2.5	Plant on individuals in centre of site

Scale
 1:1000

Scale Bar
 0m 10m 20m 30m 40m 50m

North Arrow
 N

ANTHONY JELLARD ASSOCIATES
 LANDSCAPE ARCHITECTURE LANDSCAPE PLANNING URBAN DESIGN

Client:

Project: SLURRY LAGOON AT VELINDRE FARM, ST NICHOLAS, PEMBROKESHIRE

Drawing Title: LANDSCAPE PLANTING STRATEGY PLAN

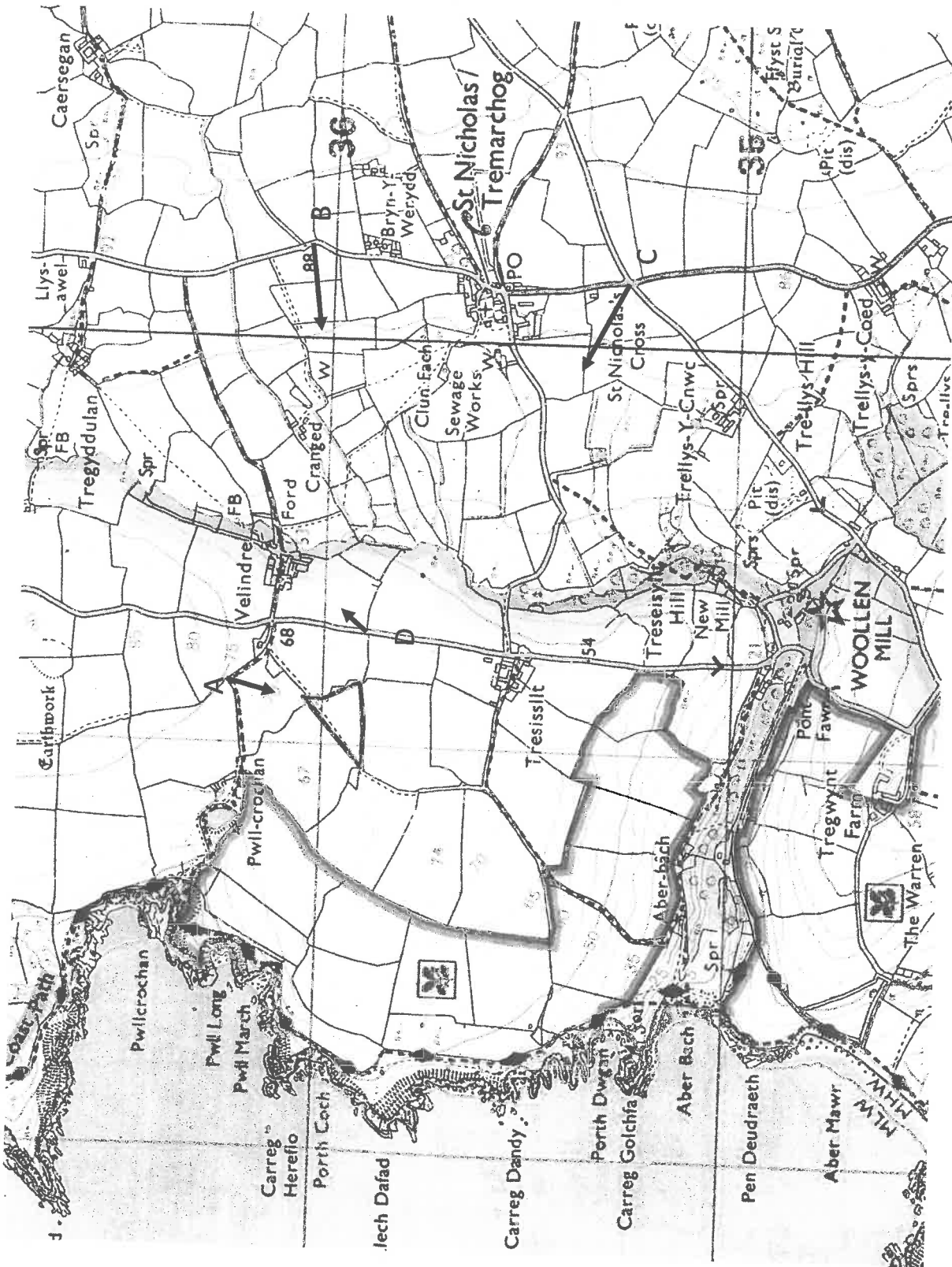
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Drawing No.: A/JA 403/01

Date: 11/11/14

Revision:

Pen Trecollage, Gwent, Nr. Abingwerry, Gwent, NP23 6LG
 Tel: 01659 750475



SLURRY LAGOON AT VELINDRE FARM, ST NICHOLAS, PEMBROKESHIRE

Photomontage Location Plan

403/02

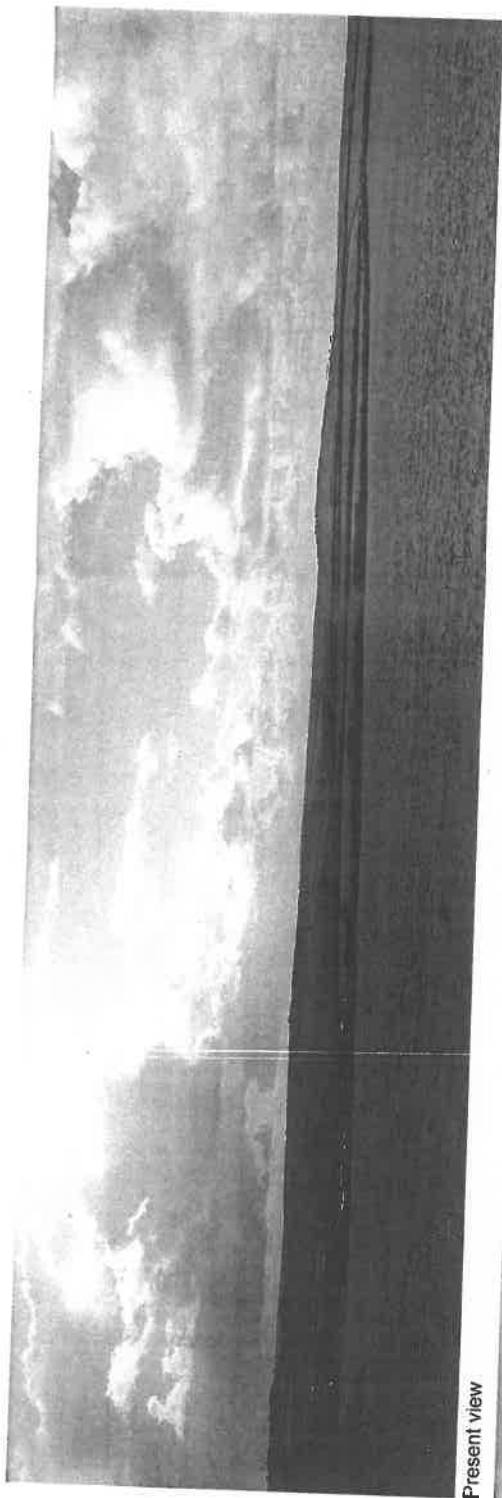
ANTHONY JELLARD ASSOCIATES

**Slurry Lagoon at Velindre Farm, St Nicholas,
Pembrokeshire**

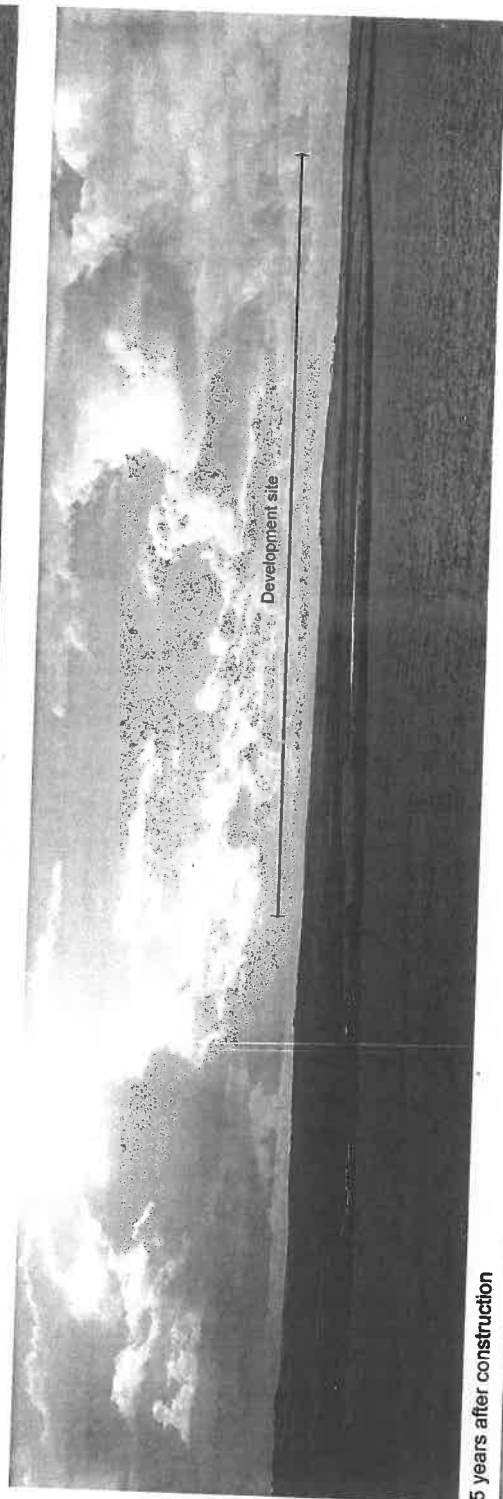
Viewpoint A : From Public Footpath just NW of
Velindre Farm (Grid Ref SM6892362)

Photomontage 5 and 10 years after construction

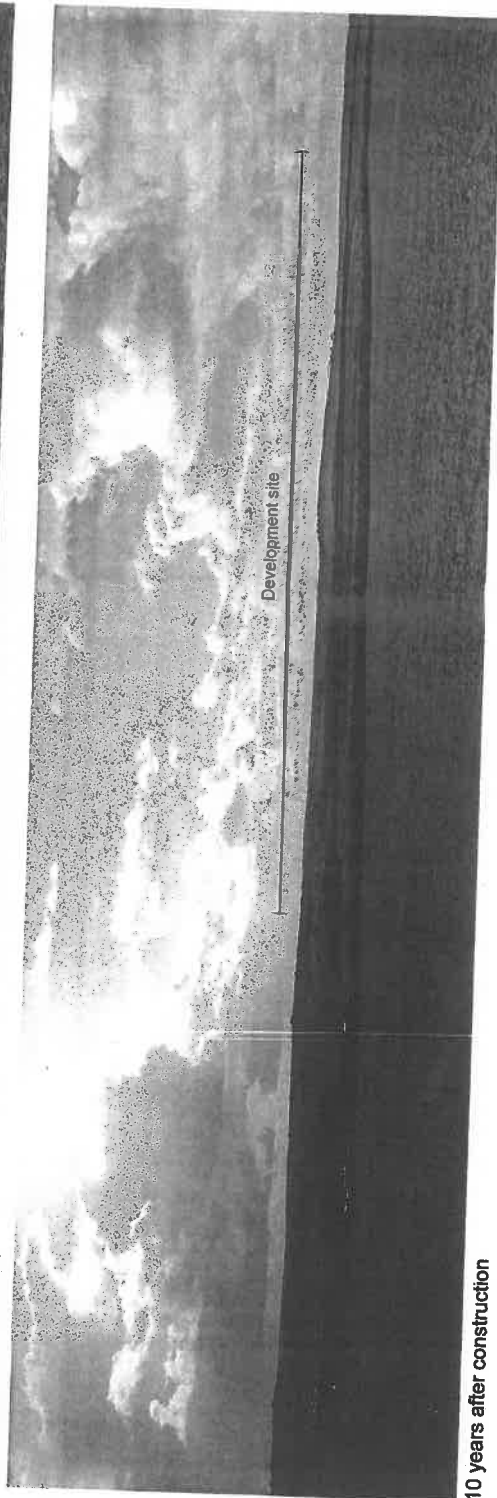
AJA 403/03
ANTHONY JELLARD ASSOCIATES



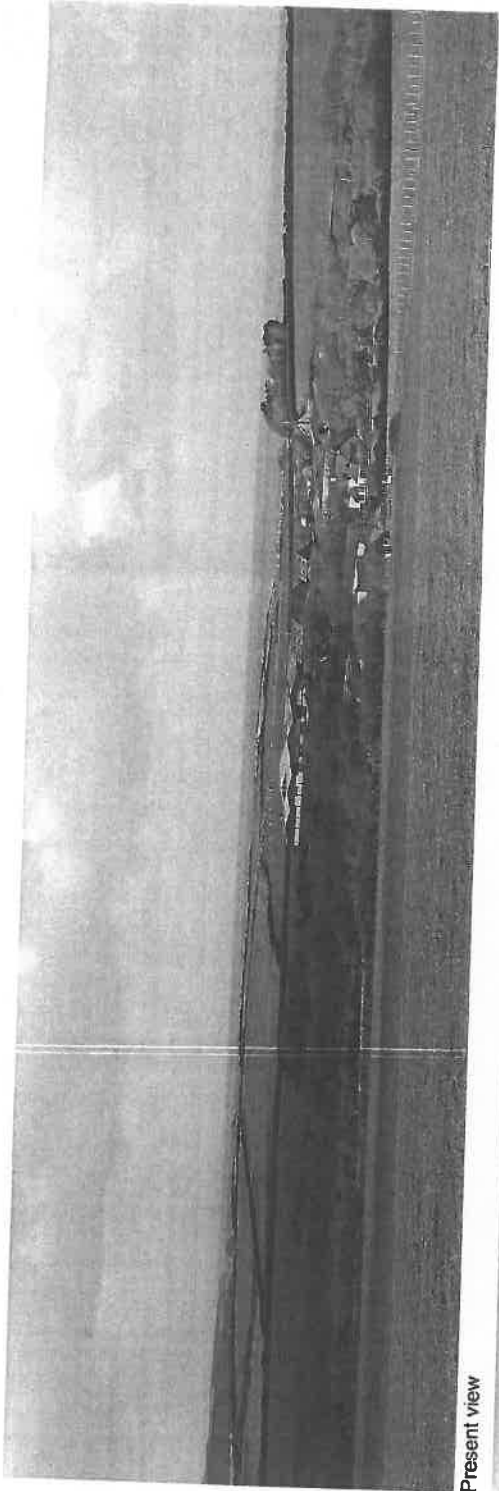
Present view



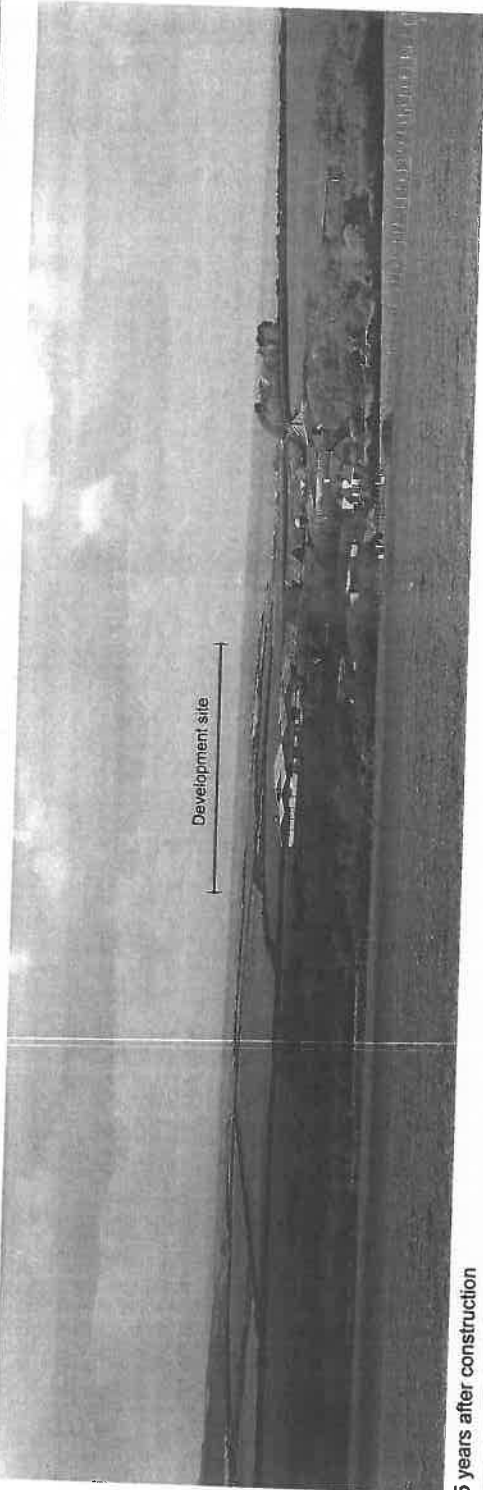
5 years after construction



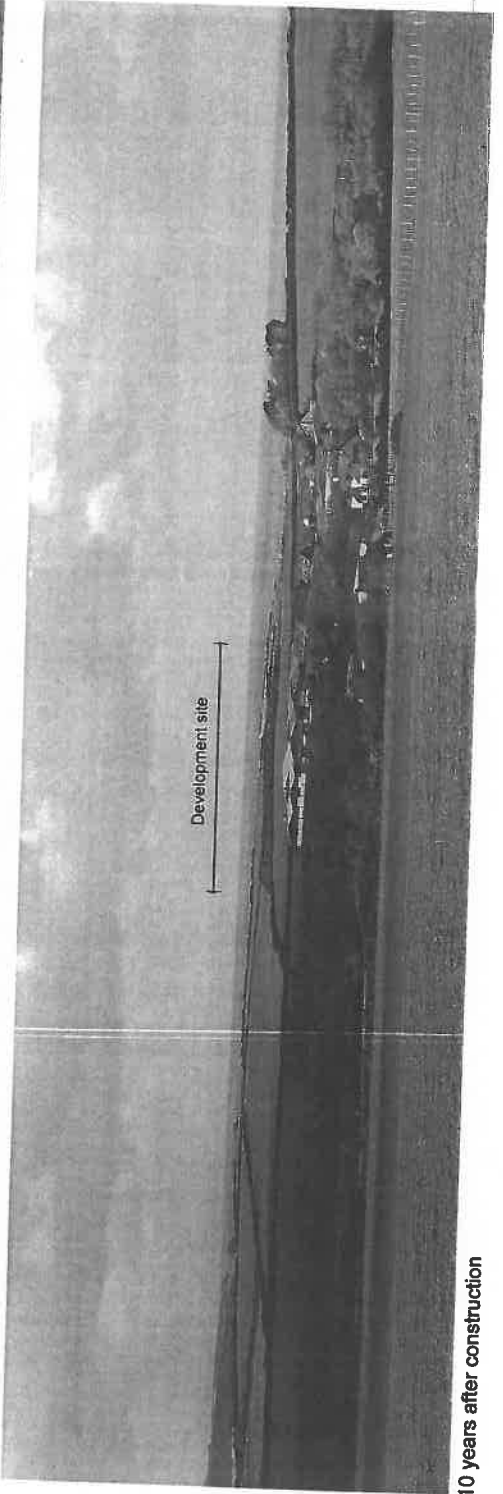
10 years after construction



Present view



5 years after construction



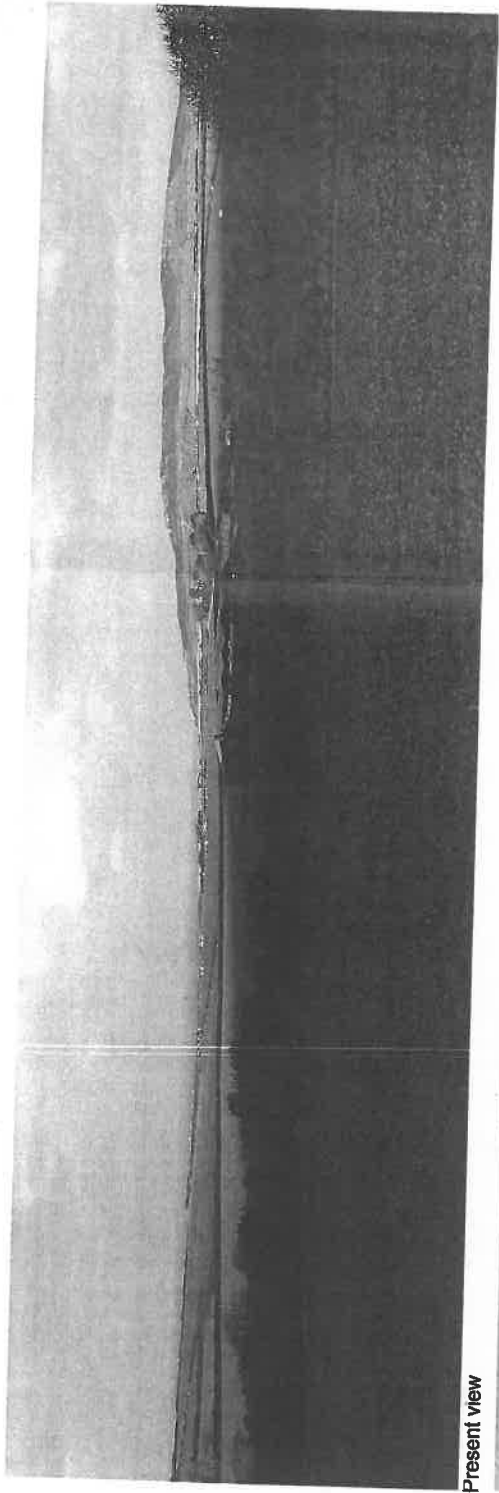
10 years after construction

Item 5a)

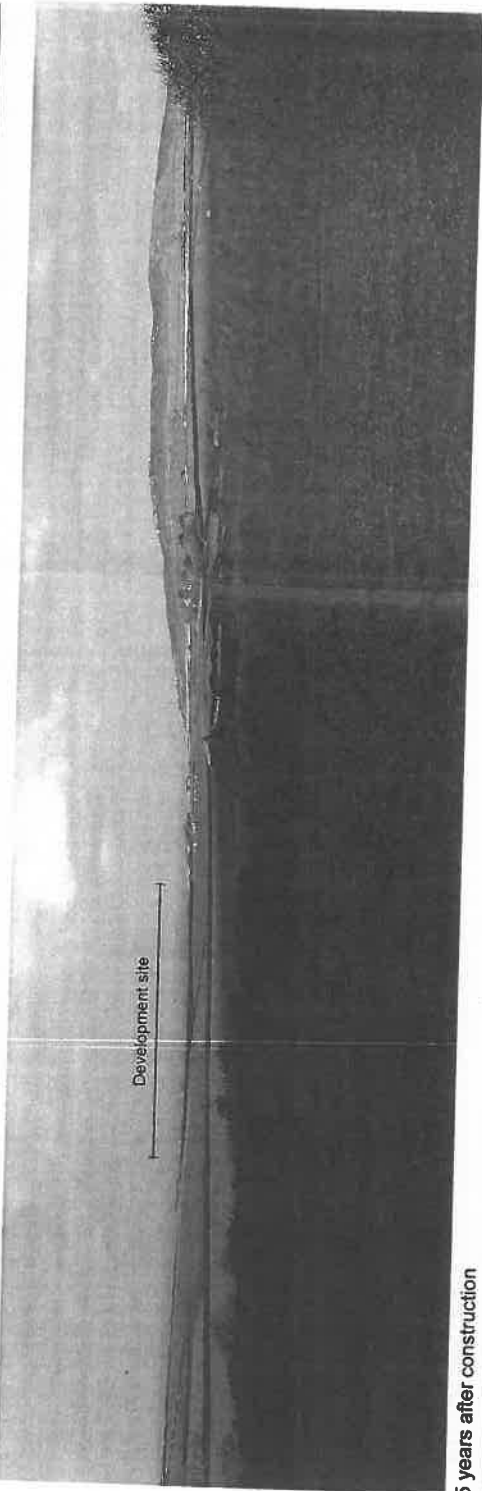
Slurry Lagoon at Velindre Farm, St Nicholas,
Pembrokeshire

Viewpoint B : From Minor Road North of Bryn-y-
Werydd (Grid Ref SM902367)

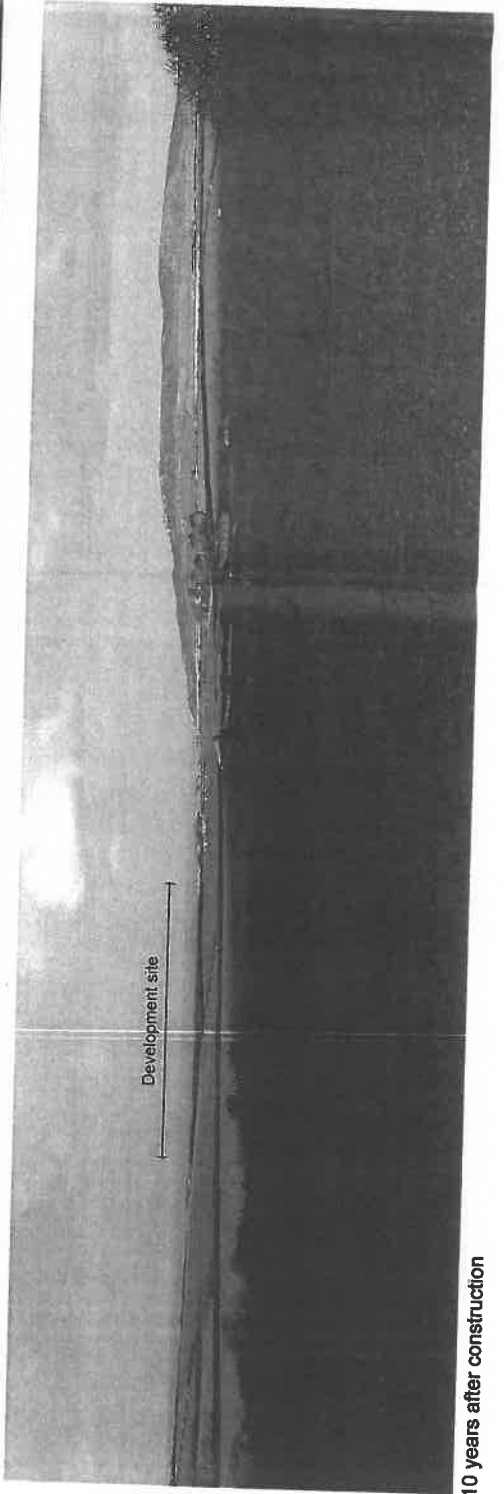
Photomontage 5 and 10 years after construction



Present view



5 years after construction



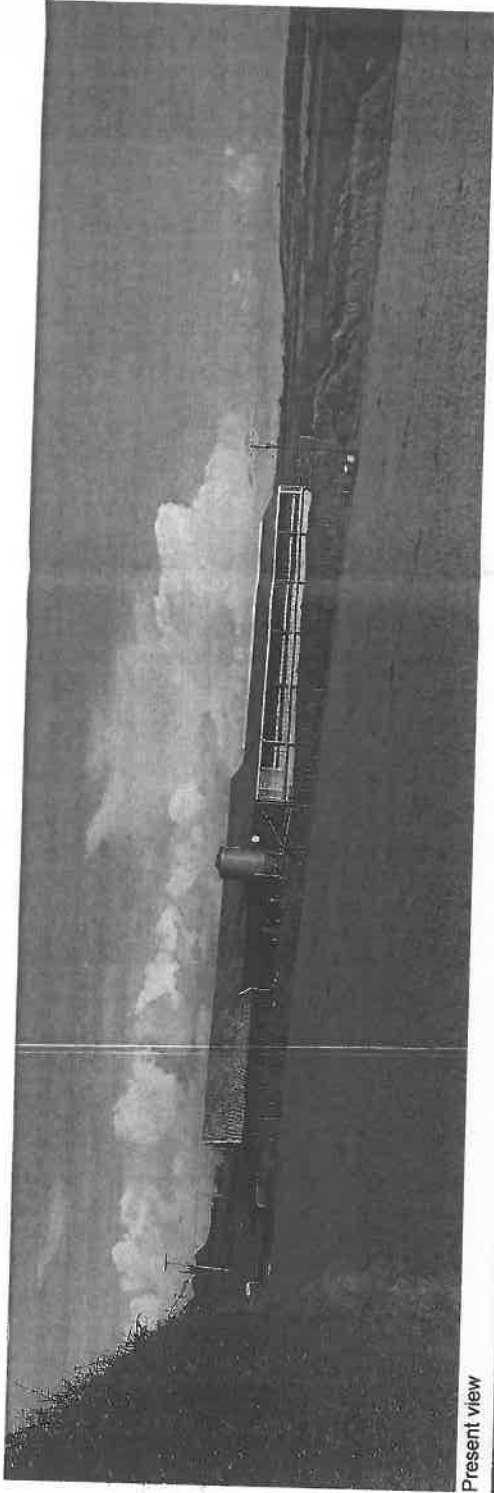
10 years after construction

Item 5a)

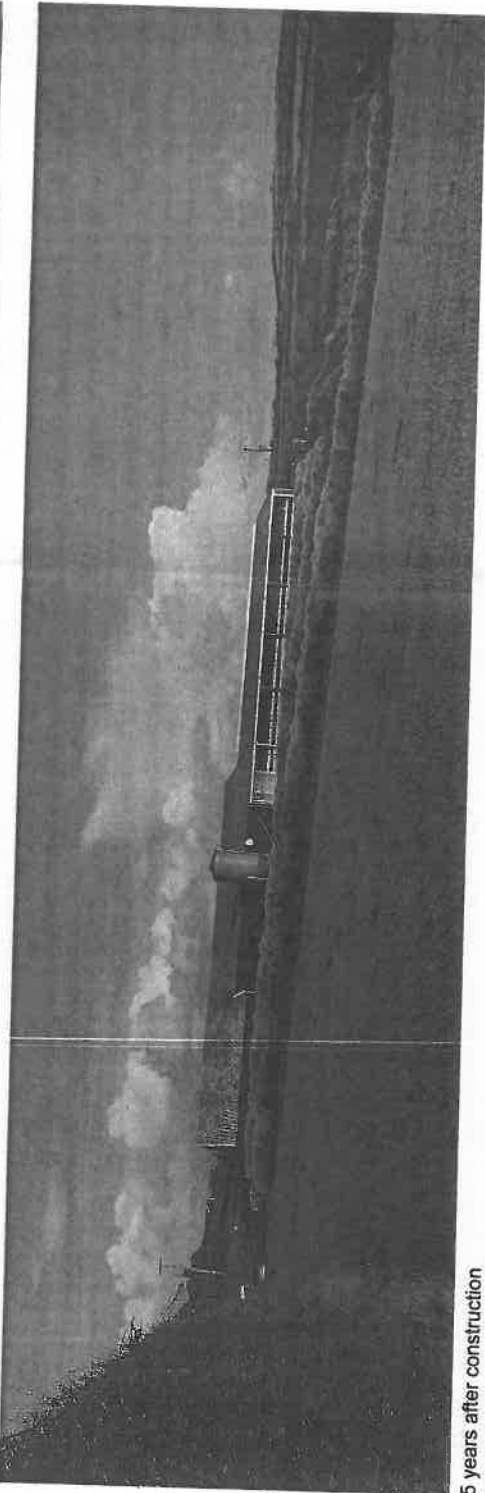
**Slurry Lagoon at Velindre Farm, St Nicholas,
Pembrokeshire**

Viewpoint C : From Minor Road Junction at St
Nicholas Cross (Grid Ref SM902353)

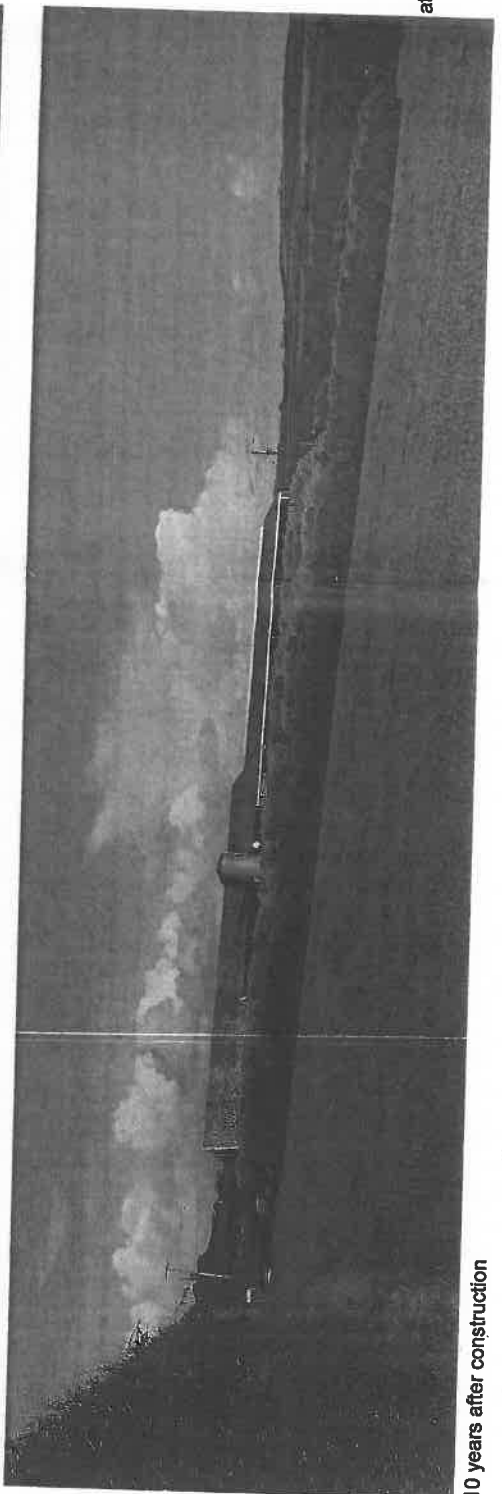
Photomontage 5 and 10 years after construction



Present view



5 years after construction



10 years after construction

Item 5a)

Cattle Accommodation at Velindre Farm, St Nicholas, Pembrokeshire

Viewpoint D : From Minor Road South of Velindre Farm (Grid Ref SM893359)

Photomontage of development 5 years and 10 years after construction assuming planning as per Consented Scheme

INDEPENDENT LANDSCAPE REPORT



www.landuse.co.uk

Proposed development at Velindre Farm

Review of landscape proposals associated with application NP/14/0311

Prepared by LUC for Pembrokeshire Coast National Park Authority
December 2014

Planning & EIA
Design
Landscape Planning
Landscape Management
Ecology
Mapping & Visualisation

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LUC uses 100% recycled paper

Introduction

- 1.1 LUC was appointed by Pembrokeshire Coast National Park Authority (PCNPA) to review the landscape proposals associated with a planning application at Velindre Farm, St Nicholas, within the National Park. The application (reference NP/14/0311) is for a cattle accommodation building, associated yard area and slurry lagoon.
- 1.2 This application has been considered by the development management committee previously, and the application is fully described in the committee report. Committee members suggested that the applicant put forward further mitigation proposals for the slurry lagoon in particular, and these were submitted to PCNPA in November 2014.
- 1.3 The scope of LUC's commission was to review this additional material and comment upon the adequacy of the landscape mitigation in relation to the proposed development and its context. No site visit was made. Specific concerns which PCNPA asked LUC to consider include:
 - Potential for the proposals to successfully assimilate with the landscape;
 - Whether views of the slurry lagoon will be screened;
 - Appropriateness of the proposals in the landscape context; and
 - The potential for change in landscape character and appearance.

Landscape proposals

- 1.4 The material submitted in November 2014, which was supplied to LUC, comprises:
 - A planting strategy plan (numbered AJA 403/01);
 - A location plan identifying viewpoints A-D (403/02); and
 - Four sets of photomontages for viewpoints A-D, illustrating the potential effect of screen planting at 5 years and 10 years after implementation.
- 1.5 The applicant notes that the submitted proposals are indicative and that the final landscape scheme will be subject to approval by PCNPA. The applicant also states an aspiration to introduce a biodiversity enhancement scheme, although no details of this are provided.
- 1.6 The landscape proposals for the slurry lagoon include a substantial belt of native woodland planting on all three sides. The proposed belt is to be a minimum of 10m across and much wider in places. This planting is depicted in the photomontages from viewpoints A-C. The landscape plan includes a species schedule and an outline specification for establishment and maintenance.
- 1.7 The photomontage from viewpoint D illustrates the screening effect of planting around the existing cattle accommodation buildings, which forms part of the previously consented development.
- 1.8 LUC also had access to a selection of the material previously submitted by the applicant, and to the development management committee reports.

Landscape context

- 1.9 The site of the proposed development falls within LCA 20 Trefin, as defined in the PCNPA Landscape Character Assessment (2011) which has been adopted as SPG. The hinterland of this LCA is described as:

a gently undulating agricultural landscape of medium-sized fields with a close visual relationship with the adjacent coast. The area is interspersed with regular scattered farmsteads and occasional hamlets and small villages. There are dispersed areas of small woodland clumps and expanses of woodland and scrub.

1.10 Special qualities of this LCA, which are relevant to this location, include:

- *"An exposed and diverse coastal landscape with extensive views along the coastline"; and*
- *"The field pattern is well defined and imparts a rich texture to the open landscape, where small areas of woodland and scrub serve as punctuation points. The importance of the traditional field boundary hedgebanks and dry-stone walls cannot be over-emphasised and the quality of their condition as a result of management practices is a defining element within the landscape".*

1.11 The management guidance for this LCA includes the following relevant points:

- *"Conserve extensive views along the coastline and the undisturbed nature of cliffs and inlet*
- *Retain and conserve expanses and clumps of woodland as important visual punctuation points; promote re-planting with broadleaved species*
- *Increase areas of unmanaged coastal grass and gorse scrub, but do not allow bracken encroachment into lowland heath and coastal grasslands*
- *Encourage landowners to participate in agri-environmental schemes, with particular emphasis on promotion of the restoration or rehabilitation of traditional field boundary hedgebanks and stone walls at key visual locations"*

Landscape policy

1.12 The key landscape policy within the adopted Local Development Plan (2010) is Policy 15: Conservation of the Pembrokeshire Coast National Park, which states:

Development will not be permitted where this would adversely affect the qualities and special character of the Pembrokeshire Coast National Park by:

- a) causing significant visual intrusion; and/or,*
- b) being insensitively and unsympathetically sited within the landscape; and/or*
- c) introducing or intensifying a use which is incompatible with its location; and/or*
- d) failing to harmonise with, or enhance the landform and landscape character of the National Park; and/or*
- e) losing or failing to incorporate important traditional features.*

1.13 The special qualities of the National Park are as set out in Policy 8 of the LDP, which refers to the *"pattern and diversity of the landscape"*.

Comments on the landscape proposals

Slurry lagoon

- 1.14 The landscape around the proposed slurry lagoon is open and exposed. It is an essentially coastal landscape, strongly influenced by the sea. The lagoon site is at an elevation of around 67m, close to a high point south-west of Velindre Farm. In this area there are very few trees, and hedgerows tend to be low and wind-blown. There is a small but distinctive stand of wind-sculpted trees within the curtilage of Velindre West, between Velindre Farm and the lagoon site, but otherwise woodland is restricted to scrub within the shallow valley to the east of the farm. There is little evidence locally of the *"dispersed areas of small woodland clumps and expanses of woodland and scrub"* mentioned in the LCA document.
- 1.15 The introduction of substantial woodland onto this raised open site would create a new feature in the coastal landscape. This is likely to be widely visible, as is the small stand of woodland at Velindre West.
- 1.16 The proposed species mix comprises a number of small trees and scrub species, with larger trees represented by *Acer pseudoplatanus* (sycamore) and *Quercus robur* (oak). The schedule does

indicate that the larger species are to be planted in the centre, with the scrub species forming a softer edge. This edge could include *Corylus avellana* (hazel) and *Prunus spinosa* (blackthorn) as well as the shrubby species listed in the schedule. The geometric form of the proposed woodland may benefit from a more irregular, naturalistic, outer edge. Combining the proposed planting with enhancement and management of surrounding hedgebanks would bring further benefit for landscape integration and biodiversity.

- 1.17 The species proposed are all native with the exception of *Pinus nigra* (black pine), which is present in the UK but native to the Mediterranean region. This species, along with *Ilex aquifolium* (holly), has been selected presumably to provide winter screening, though a more locally appropriate species could be found particularly if biodiversity benefit is sought. It is also queried whether *Acer pseudoplatanus* (sycamore) is the most appropriate choice for this location. PCNPA biodiversity officers will be able to advise on this matter.
- 1.18 In this exposed location, it is likely that the smaller scrub species will be more successful, while larger trees are less likely to reach their full height. It is possible that this is reflected in the photomontage views, which show a low level of growth even in the year 10 view. For example, the year 10 view from viewpoint B contrasts the low plantation against the established trees at Velindre West. The planting shown in the year 10 view from viewpoint A does not appear much taller than the adjacent hedges. At this stage, we would normally anticipate growth in the region of 6-8m, which is as shown on the indicative landscape sections previously submitted (numbered RAC/6199/11).
- 1.19 While coastal exposure may limit growth, the climate of Pembrokeshire is not especially unfavourable. The level of growth shown in the photomontages may therefore underestimate what will eventually be present in the landscape, and consequently the prominence of the mature woodland. There is no reason to suggest that the planting will not attain the same height as the trees at Velindre West.
- 1.20 The photomontage for viewpoint A is not especially helpful. The photograph is taken against the sun making it difficult to make out the proposal in the view, despite its proximity. We do appreciate the difficulty of obtaining adequate south-facing photography for visualisations in autumn/winter, when the sun is low in the sky. However, this is a key viewpoint on the public footpath closest to the proposed lagoon. It highlights the likely visibility of the lagoon which will be particularly apparent during construction work and, as depicted, up to five years post-construction.
- 1.21 The outline management proposals set out on the planting strategy plan would require development to ensure reliable maintenance of the woodland over a five year period.

Cattle building

- 1.22 No details of this planting have been provided, other than what is shown in the photomontage from viewpoint D. Nor is this planting referred to in the earlier Design and Access Statement. The photomontage indicates some woodland/scrub planting which would assist in screening views of the existing buildings, though the roadside hedgerow already provides screening from the public road in this location. However, the principle of additional native planting to ameliorate the present exposed earth banks is to be welcomed.

Conclusions

- 1.23 Assuming that it is properly implemented and managed, the proposed planting at the slurry lagoon is likely to provide, in time, adequate screening of the development. This will not become apparent for several years as the planting will take time to mature. The screen planting will eventually become a feature in views of this area, forming a new 'punctuation point' as noted in the LCA. As such, the landscape proposals meet the stated objective of achieving a degree of screening around the proposed lagoon and could, in time, be accepted as part of the landscape character.
- 1.24 The wider test for the development is the principle of development in this location, and whether this is the most appropriate site for such an installation. With reference to the criteria outlined in

LDP Policy 15, the landscape proposals may mitigate criterion (a) significant visual intrusion. On the other hand the development, in our view, would not satisfy criteria (b), being unsympathetically sited, (c), not being compatible with its location, and (d) in failing to enhance the landscape character of the area.

- 1.25 If the development is permitted, it is recommended that a more sympathetic planting plan is developed, in consultation with PCNPA, which softens the geometric layout proposed and modifies the planting list to include locally appropriate species. The proposals could be better tied into the surrounding hedgebanks and enhancement/management proposals for these would also be welcome, as set out in the LCA management guidelines.

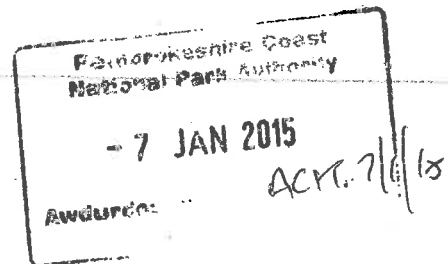
**CORRESPONDENCE RECEIVED SINCE
SEPTEMBER DEVELOPMENT MANAGEMENT
COMMITTEE MEETING**

DC Team shared mailbox

LS

From: Liam Jones
Sent: 07 January 2015 07:38
To: DC Team shared mailbox
Subject: FW: Velindre Farm

From: R
Sent: 06 January 2015 22:26
To: Liam Jones
Subject: Velindre Farm



Dear Mr Jones,

At the Development Management Committee meeting of 22 October 2014 it became apparent that some members of that committee were ready to compare the problem of odour from the slurry being produced by Velindre Farm with that which might be found on a conventional farm.

Members should be aware this is not the case. In modern intensive indoor dairying cows are fed a special diet (which I understand is relatively high in proteins) and the slurry produced has a much more pungent smell, as compared with conventional manure.

Obviously any increase in the herd size at Velindre must inevitably tend to aggravate any existing nuisance and increase the harm to the amenity of those living nearby.

The site of the slurry lagoon, as presently proposed, is, according to the applicants, the only position where a clay-lined lagoon can be constructed.

This site is particularly visually sensitive, as it lies in the open coastal plain.

Any planted screening of the lagoon would be difficult to establish (the site is very exposed) and of perhaps rather limited effect.

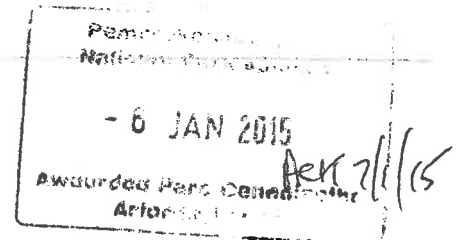
I think it is arguable that the screening planting itself would represent an intrusive feature in this type of open landscape.

LJ

DC Team shared mailbox

From: Liam Jones
Sent: 06 January 2015 11:57
To: DC Team shared mailbox
Subject: FW: Application No NP/14/0311 Velindre St Nicholas

From: Tegryn Jones
Sent: 06 January 2015 11:45
To:
Cc:
Subject: RE: Application No NP/14/0311 Velindre St Nicholas



Thank you for the e-mail. The information has been passed onto the office dealing with this application.

Pob hwyl

Tegryn

From: [redacted] [mailto: [redacted]]
Sent: 06 January 2015 11:11
To: Tegryn Jones
Subject: RE: Application No NP/14/0311 Velindre St Nicholas

Mr Tegryn Jones
 Chairman
 Pembrokeshire Coast National Parks Authority

Dear Mr Jones,

Please excuse me writing to you direct but time is short and going through your officers is unproductive. I and my wife own (and partly rent as holiday lets) the property, Treseissyllt Hafod, which neighbours Velindre to the South. We have written two letters of objection to the planning application to add to the numerous other ones you have received from the St Nicholas, Pencaer and surrounding communities.

If the words "National Park" and the "Pembrokeshire Coast National Parks Authority" are to have any meaning and substance other than being mere words then you must reject this application:

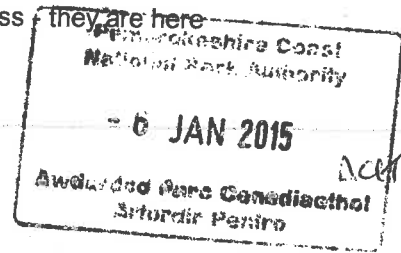
1. It is vastly overscale for the area. Farming a herd of nearly 900 milking cows on such a small and remote area with high fixed costs is, given the current low price of milk, over ambitious. You really shouldn't encourage it unless you're satisfied on its economic viability. But have you looked at this?
2. The buildings you have already permitted are out of scale with the surrounding countryside, spoil the view of Strumble Head and light up the night sky like a beacon. And now the applicants have started building another one.
3. The roads can't take the traffic. The cows are too many to be managed outdoors and have to be kept inside and largely fed artificially, needing a great deal of imported fodder. Even more serious, the dispersal of slurry in tankers on to the neighbouring farms puts a massive strain on the lanes. Come and stand at our gate when this is going on - it feels like standing by a motorway.
4. The slurry lagoon will be the size of a lake. It will look ugly, the smell appalling, and the noxious gases e.g. ammonia, hydrogen sulphide, methane positively dangerous.

We find the supine approach by PCNPA utterly dismaying; you really need to get some backbone into the organisation and stand up for the principles behind the National Park. Otherwise, what is the point of the PCNPA? There are many of us in the area who are starting to feel PCNPA is not up to the job and we would get a more

DC Team shared mailbox

LJ

From: Liam Jones
Sent: 06 January 2015 11:29
To: DC Team shared mailbox
Subject: FW: comments just sent without name and address



From: [redacted]
Sent: 06 January 2015 04:11
To: Liam Jones
Subject: comments just sent without name and address - they are here

To: Mr. Liam Jones

Comments for Velindre consultation on the screening of a slurry lagoon. January 21st.

1. The only way that the present enlarged farming operation can be carried out at Velindre is because we who live near to the farm are bearing all the environmental costs. Construction of a lagoon will greatly exacerbate all our current difficulties.
2. The construction of a slurry lagoon will allow for a much larger herd of cows. It will be visually intrusive in an open landscape and it is doubtful how well any trees planted around it will grow in so windswept an area. It will increase all the traffic, noise and odour issues which have already reached an intolerable level for the local community. It will further devalue the properties of Velindre West and Pwll Crochan and severely affect the three households at nearby Tressylyt. Residents of Ludchurch Village, outside the National Park, are attempting to sell their properties because they cannot abide living close to the stench of Ludchurch Farm. Must the residents of St. Nicholas and those in the Aberbach valley face a similar bleak future?
3. The Park planning officer has strongly recommended refusal of planning permission. Mr. Harries is already putting up a huge new building without such permission. Once it is up he will insist that he must have a lagoon to meet the needs of his enlarged herd. It appears that the National Park has no specific policies to apply when dealing with an industrialized dairy unit. This crisis offers an opportunity for them to create policies appropriate to these huge, industrial-style developments which were not even dreamed of when the Park was founded. The principle of the polluter must pay sounds like a good idea but this is not what is happening at present. It can only be applied after damage has been done by the payment of fines but it will not prevent ongoing damage. The applicant does not have a good track record of doing what the Park authority has asked for, ie, a shelter belt for the existing buildings has never been planted. I therefore urge that the "precautionary principle" be followed for the following reasons.
 - a) There is a major threat to the integrity of the very small stream that runs from Penysgwarne past Velindre and down to Aberbach. This is a tiny stream which is not capable of safely absorbing the slurry run-off from Penysgwarne and Velindre. Mr. Harries is likely to gain access to more land on this watershed further overloading the capacity of the stream.
 - b) A major issue which has not been addressed is the danger of eutrophication of both the stream, the beach and the coastal waters, all vital life support systems for wildlife and marine species such as dolphins and porpoises. It is of the utmost importance that eutrophication not be allowed to happen as it would have very serious consequences not only for visitors but for the local fishing and lobster industries. A proliferation of

these so-called “sustainable intensification” industrialized dairy operations would lead to a poisoning of the entire coastline. To see what can happen visit the following two links which relate what has happened to the beaches of north Brittany as a result of intensive farming units:

http://www.french-property.com/news/french_life/nitrates_water_pollution/

<http://www.theguardian.com/environment/2011/jul/27/brittany-beaches-toxic-algae-boars>

c) The construction of such a lagoon will bring serious health implications for humans and other species. These lagoons continually emit poisonous gases into the air such as methane and nitrous oxide, two of the most potent greenhouse gases, also hydrogen sulfide, ammonia and carbon dioxide. Most of the ammonia will rise out of the lagoon and settle within a kilometer of the lagoon. Ammonia is a level 2 toxin. Residents living near to a similar lagoon in Carmarthenshire have reported rises in the incidence of asthma and conjunctivitis from the ammonia fallout. Hydrogen sulfide molecules can travel up to six miles in whatever direction the wind blows which means they can fall over the entire headland of Pencaer and as far as Lower Town in Fishguard. More than one hundred and fifty pathogens have been identified in slurry lagoons including E. Coli, cryptosporidium, anthrax, salmonella, giardia lamblia and many others.

d) Nitrogen and phosphorus and other toxins falling on fragile cliff habitat and the National Trust fields and will affect sensitive grasses, the beautiful lichens and mosses which grow there while stronger, more invasive grasses will take over, radically altering the habitat on which many different species of birds not found inland, survive.

e) As the owner of twenty-nine acres down stream from Velindre, I object most strenuously to the construction of a slurry lagoon as it will add substantially to the burdens that are already being placed on my land in the Aberbach valley, the fall-out of ammonia and other toxins originating at both Velindre and Woodlands, the unacceptable risks of damage to the precious natural resources on my land and the threat to my cottage-letting business which is entirely dependent on the presence of clean water in the stream and on the beach and on breathable sea air. I have invested over sixty thousand pounds in necessary improvements to the interior of one cottage alone in recent years, small change to a large farmer perhaps but not to me. A further expansion of the already large farming operation at Velindre places my business, the health of the Aberbach stream and the safety of Aberbach as a bathing beach at unacceptable levels of risk.

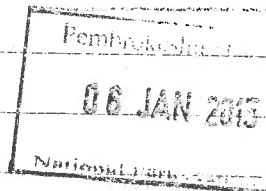
For the first time in more than thirty years of letting these cottages, in 2014 my regular visitors have complained bitterly of “daylong appalling odours, extreme, pervasive, widespread, intense, dreadful” are some of the adjectives they have used to describe their experiences. I have learned that there are products available to farmers which can mitigate the foul odours and some make the stirring of a lagoon unnecessary but Mr. Harries has chosen not to invest in these when spreading slurry, preferring to broadcast the foul odours far and wide for local residents and tourists to bear. It does not speak well for his attitude towards his neighbours.

The construction of a lagoon would extend these foul industrial odours over weeks, not just days and it is hard to see how those who stay in my cottages and all who visit and enjoy the two beaches and the cliff walks will want to return. Without the rental money, I would not be able to maintain the two historic cottages I own. I use the services of a letting agent who lets twenty-two cottages in the area. The collapse of my business and hers would have serious knock-on effects on the local economy, the restaurant and retail

trade, the work done by skilled local builders and other craftsmen and all engaged in the important tourist sector of the economy.

f) If this lagoon is allowed, what is to prevent more being situated elsewhere in the Pembrokeshire Coastal Park? It will set a precedent that will prevent other British parks from prohibiting them from within their own borders?

g) I find it inconceivable that one farmer may be allowed to increase the burdens he is already placing on others, create so much damage to so many peoples' lives and livelihood and put at further risk the ecology of a very sensitive area within a National Park all for the sake of just one more regular full time job and the maximization of his own profits. This is totally contrary to everything that the National Park was created to do, which is to preserve and enhance the precious natural resources of this beautiful area for the enjoyment of all. I understand that Mr. Harries is obtaining further signatures in support of his operation. How many of those who sign such a petition own property or run a business downstream from Velindre or have any idea of what is really at stake?



3rd JAN. 2015.

Re: Proposed Slurry Lagoon, Velindre
St. Nicholas.

Dear Sir / Madam.

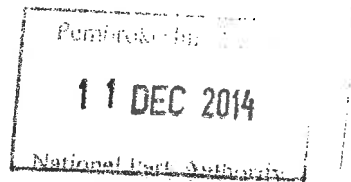
Before the decision is made on whether to grant permission for the above proposal, I would urge all NPPC members to drive by the new slurry development just outside Haverfordwest, on the Fishguard Road. The stench is appalling! With these lagoons becoming ever more common places in Pembrokeshire, it is becoming a very smelly county! A great welcome for tourists; who will not come again.

Two more points I'd like to make.

- ① Cows are grazers. A large amount of CO₂ will be released into the atmosphere from the Lagoon.
- ② It is only a matter of time until these cattle succumb to some horrid disease, i.e. CJD or such like — with an inevitable public health outcome. Imagine the outcry.

One more thing — the farm in question has already erected a structural fabrication — obviously very confident of your approval!!

Yours sincerely.



FR

Mr Tegryn Jones
 Chief Executive
 Pembrokeshire Coast National Park
 Llanion Park
 Pembroke Dock
 SA72 6DY

Your ref: NP/14/0311
 Our ref: MR/ns/150
 Email: Nicky.sawdon@nfu.org.uk
 Direct line: 02476 858580
 Date: 9 December 2014

Dear Mr Jones

**Application for creation of a slurry/ dirty water lagoon
 Planning Application Number NP/14/0311**

I am writing to you on behalf of the NFU, which represents more than 55,000 farming and grower members in England and Wales, and on behalf of our member, Mr Daniel Harries, to express serious concerns about the manner in which his planning application for construction of a cattle accommodation building with associated yard and new slurry and dirty water lagoon at Velindre Farm in St Nicholas is being handled by the Pembrokeshire Coast National Park Authority.

Mr Harries submitted the original planning application as far back as May of this year and has subsequently provided all manner of additional information and detailed reports on a number of specific aspects of their application. These include additional information on traffic movement calculations, manure management plans and landscaping plans, as requested by your planning officials. Yet, as we approach the end of 2014, we are very concerned that he is still waiting for the determination of his application.

I must record my grave concerns that in addressing the Development Management committee meeting on the 10th of September, the Planning Officer, in recommending refusal of the application, made heavy reference to a consultant's report drafted by William Waterfield of White & Waterfield Ltd, which was commissioned by a group of objectors to these proposals. Firstly, the independence of the report must be questioned. Secondly, this report itself is highly erroneous and is primarily based on Nitrate Vulnerable Zone (NVZ) legislation which does not apply to this area of Pembrokeshire. It also contained several inaccuracies and unsubstantiated assumptions and provided a highly inaccurate viewpoint of the impacts of the proposals.

I'm also very concerned with the Development Management committee's continuing deferral of the application, in spite of the application having been discussed at length in meetings of the Development Management committee on the 10th of September and the 22nd of October and a site meeting held at Velindre Farm for members of the Development Management committee on the 22nd of September. In particular I query the further deferral of the application at the meeting of the Development Management committee held on the 22nd of October in spite of the fact that the majority of committee members voted against the recommendation of the Planning Officer to refuse planning permission. Surely the vote taken at the meeting showed that a majority of committee members were in favour of the proposal and we must question why approval of the

application was not granted at that meeting. I must also query why the application was not included for discussion on the agenda for the Development Management committee meeting on the 3rd of December and therefore will not now be discussed until their next meeting on the 21st of January 2015?

We note that your Planning Officers have allowed some representations and additional information in respect of this particular application to be submitted for consideration at short notice, in particular letters of objection and the aforementioned consultant's report drafted by William Waterfield of White & Waterfield Ltd on behalf of a group of objectors. However, our member has not been afforded the same treatment when asked to provide additional information requested by your officials. For example, our member's request for a week's extension to your deadline of the 10th of November to provide additional landscaping proposals was not given fair consideration. Our members submitted these additional landscaping proposals to your officers on the 18th of November; however it has been deemed that this wasn't sufficient time to ensure that they could be considered at the Development Management committee meeting on the 3rd of December. I find this difficult to accept especially given the short notice that was previously afforded for representations of opposition, including the report by William Waterfield which was submitted to your officers on the 3rd of September ahead of the committee meeting on the 10th of September. There seems to be a huge inconsistency here and our member is made to suffer unnecessary delay as a consequence.

We must also query the information on the Pembrokeshire Coast National Park Authority website relating to this particular Planning Application, in particular around the proposed slurry lagoon. You'll see from the attached Appendix A drawings provided with the original planning application submitted by Mr Harries that the slurry lagoon itself (outlined in black) covers an area of approximately one acre. However the information displayed on your website, a copy of which I've attached at Appendix B, gives the impression that the slurry lagoon itself is far bigger in size than what is actually being proposed. This is extremely misleading and the information about the proposals displayed on your website is therefore very misrepresentative to any member of the public looking at the information that you've provided about the application.

The importance of the farming industry as the backbone of rural Pembrokeshire cannot be overstated. It should also be noted that the food and drinks industry is an important employer in both urban and rural communities throughout Wales and recent Welsh Government analysis suggests that the food and farming supply chain extends to 23,300 registered businesses, £17.3 billion turnover, 170,000 jobs and £4.0 billion Gross Value Added (GVA) across Wales.

Land managers also have far greater scope than any other sector of Welsh society to deliver benefits that support economic growth whilst also increasing the quality of our environment. In a global context, with an ever increasing population together with the challenges of climate change, it is important that farmers throughout the Pembrokeshire Coast National Park Authority area are allowed to play their part in the global food production system. There is a need to recognise that investment and modernisation in farming is essential to meet increasing economic, environmental and animal welfare demands and to also help keep the countryside and rural communities alive.

The Pembrokeshire Coast National Park Authority has outlined its duty to support the social and economic well-being of local communities within its own Management Plan and I would strongly argue that one of the authority's core objectives is to promote sustainable agriculture. In pursuit of these goals, the NFU has long called for a planning system that demonstrates a thorough understanding and appreciation of the role of agriculture and for an appropriate balance to be struck between the weight attached to the protection of the landscape and community and business development within the National Park. I am sure that I don't need to remind you that

generations of farmers, such as Daniel Harries and his family have shaped the landscape and the environment of the Pembrokeshire Coast National Park area long before the National Park was designated and the establishment of the Authority.

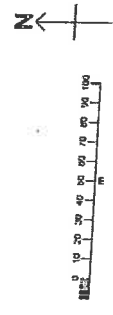
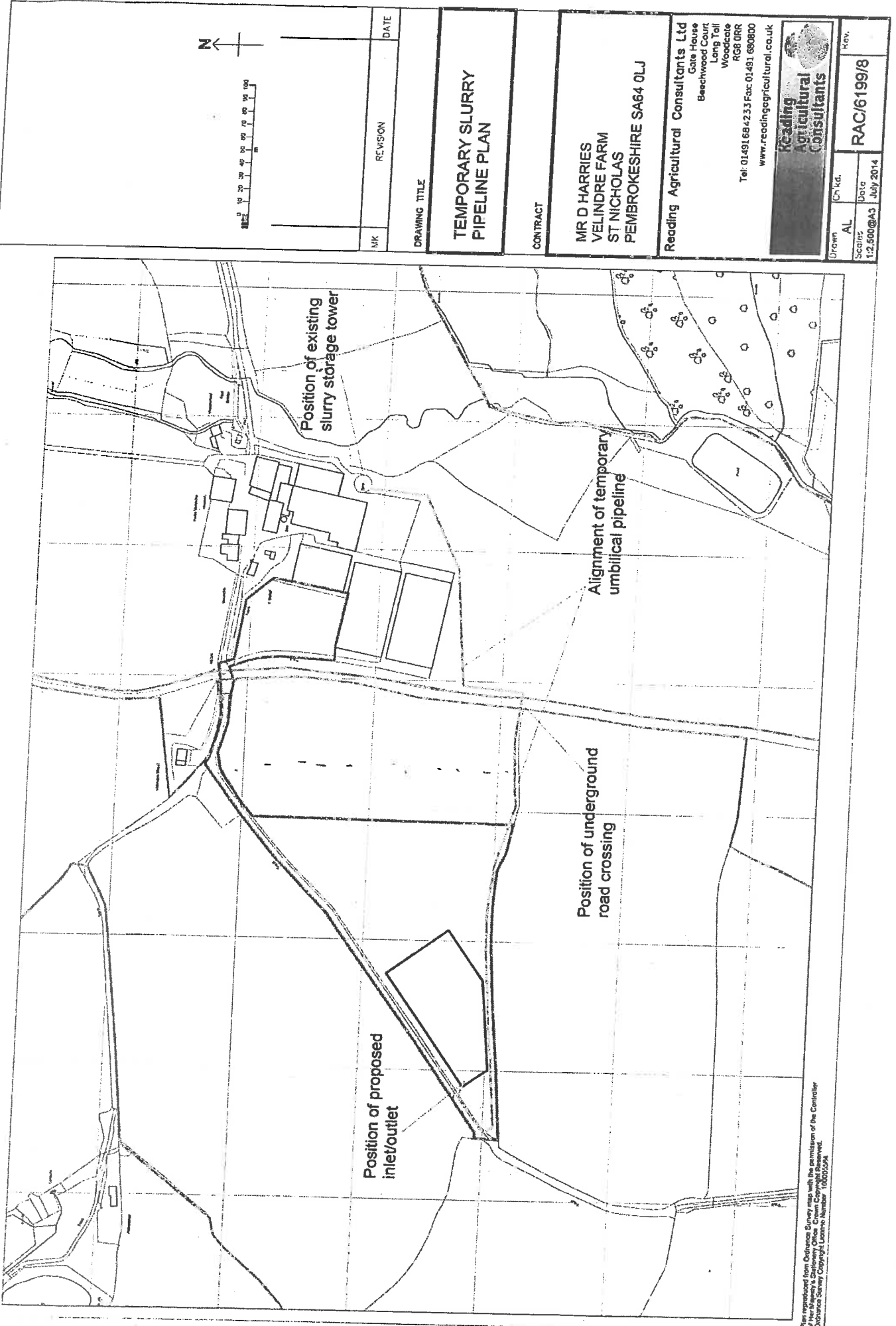
You will be aware the farming industry continues to face formidable challenges with market volatility, high input prices and increasing regulation. In response to these challenges farmers have had to grow and adapt their businesses so that they can remain viable. Our member is no exception and this proposal 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 have been privileged to visit the farm and seen at 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 on the farm and I must stress that the feedback I have received from the event and read on social media has been extremely complimentary.

From the discussions we have had with Mr Harries we can only conclude that this development is absolutely necessary for the continued operation of a modern efficient dairy unit, and that its location will enable the business to continue to farm to the highest standards. This business not only supports Mr Harries and his family but also supports 7 full time staff and 3 part time with plans to increase staffing levels in line with the development of the business plus the benefits to the wider rural economy through the number of businesses they supply to and purchase from. It is in my opinion vital that growing businesses are fully supported in order to meet the challenges as laid down by the major retailers in delivering high quality food for an ever growing consumer base whilst securing economic sustainability and growth.

I hope you will recognise that our member has endeavoured to provide all the necessary information in support of their planning application and that this has been done at significant cost to them in terms of time and money. I therefore trust that you will give the concerns that I've raised your fullest consideration.

Yours sincerely

APPENDIX A



NO.	REVISION	DATE

DRAWING TITLE
TEMPORARY SLURRY PIPELINE PLAN

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

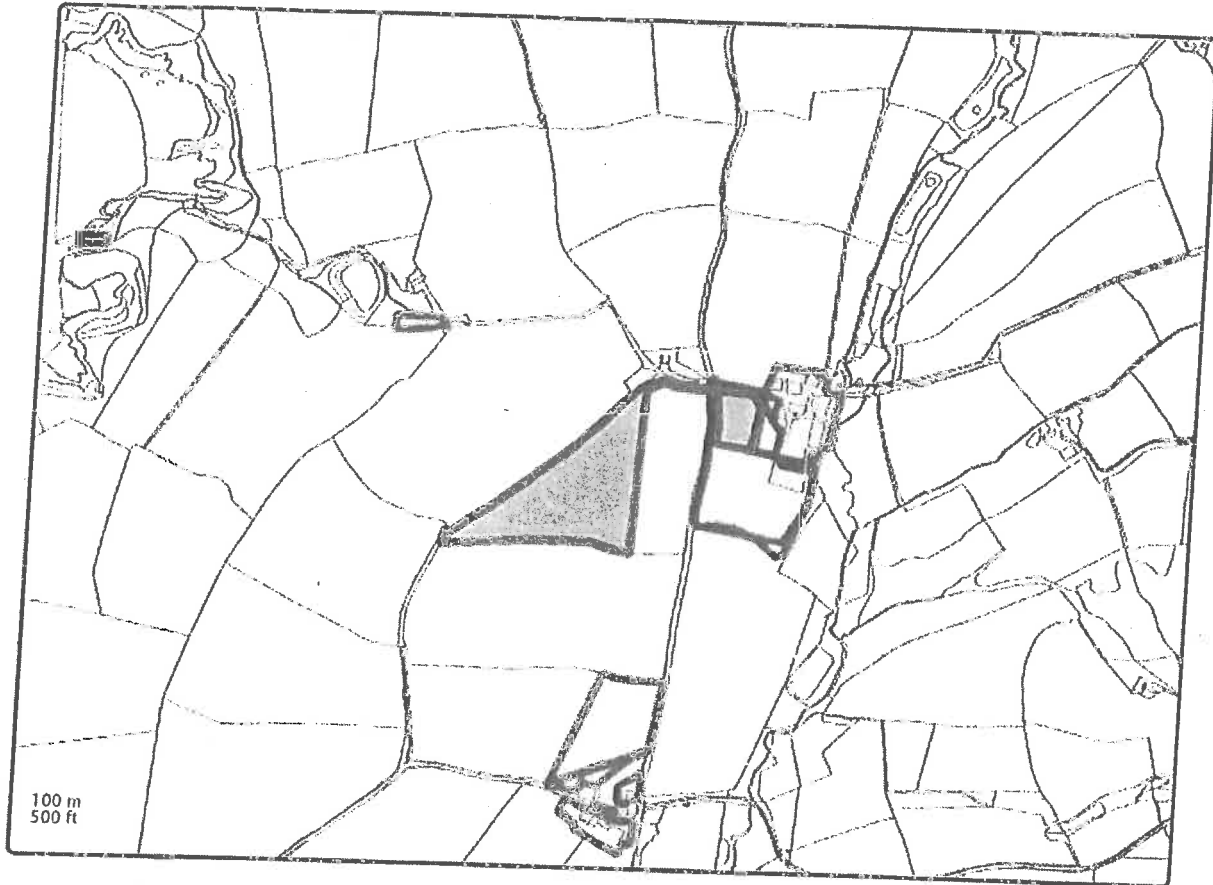
Reading Agricultural Consultants Ltd
 Gate House
 Beechwood Court
 Leng Tal
 Woodcote
 R68 0RR
 Tel: 01491 654233 Fax: 01491 650800
 www.readingagricultural.co.uk



Drawn	AL	Chk'd.		Rev.	RAC/6199/8
Scale:	1:2,500@A3	Date:	July 2014		

Plan reproduced from Ordnance Survey map with the permission of the Controller of Her Majesty's Stationery Office. Ordnance Survey Copyright Licence Number: 100020294

APPENDIX B



(Current application highlighted in green)
[View rough location in Google Maps](#)

;btinternet.com]

pembrokeshirecoast.org.uk;

st.org.uk; Arthur and Mary

pembrokeshirecoast.org.uk;

t.org.uk;

jo@pembrokeshirecoast.org.uk;

allana@pembrokeshirecoast.org.uk; owenj@pembrokeshirecoast.org.uk;

bobk@pembrokeshirecoast.org.uk; paulh@pembrokeshirecoast.org.uk;

gwynethh@pembrokeshirecoast.org.uk; teds@pembrokeshirecoast.org.uk; Geoffrey Sinclair;

davidr@pembrokeshirecoast.org.uk; peterm@pembrokeshirecoast.org.uk

Subject: Fwd: Application NP/14/0311

Member of the Pembrokeshire Coast National Park Authority

Application NP/14/0311 Cattle accomodation building , associated yard area and slurry lagoon Velindre, St. Nicholas.

The Executive of the Pembrokeshire Branch of CPRW wish to support the Planning Officer's recommendation for refusal of this application for the reasons given in order to maintain the integrity of the National Park. We also support local residents' concerns at the extra traffic this will generate on local lanes.

Furthermore we would like to draw your attention to the fact that the Environment Agency has previously declined to take action against such a development when serious odour issues arise, even though their sister organisation in England does take action on behalf of affected residents there and does require polluting farm developments which allow foul odours such as overwhelming stench to invade residents homes, to stop polluting.

As an example, I draw your attention to the intensive dairy farm, Ludchurch Farm in Ludchurch, which is causing misery to at least one resident whose listed home has become so devalued by the stench emanating from the farm that it is unsaleable. This development was subject to an Ombudsman's critical report which found that Pembrokeshire County Council were unaware of what exactly they were granting permission for. The dirty water lagoon nearest to the affected residence is apparently not the cause of the noxious stench; the problem appears to be effluent and slurry stored on the farm, as this application before you also proposes. The stink experienced from Ludchurch Farm is different from the usual slurry and manure smells emanating from the farm and is on times so nauseous, that people cannot remain in the grounds of this private house, nor in its rooms. It can be smelt by other residents and by passers by on the local road and can reach on times over a distance. This is not the normal nor enhanced smell of an intensive dairy establishment. This is a gaseous stink of industrial standard which is all pervading. When visiting the house we had to leave quickly because we were gagging in the noxious stench even though both my husband and I grew up and worked with cows on dairy farms.

Because the environment Agency will not take the action they should, and attempt to control excessive and polluting odours emanating from the farm, the home owners in Ludchurch have to resort to their house insurance for legal action to obtain some relief from it. This is on going as I understand. Any quality of life and enjoyment of their property has been

completely removed from them. They described to me how they lock their doors and just sit down and cry because of it. Their listed house has been left totally unprotected from the stink by the County Council Planning authority.

In a case in Shropshire concerning an intensive farm unit, later withdrawn, Shropshire Planners were minded to put on a condition that all odours remain on the farm. If your Committee do decide to go against the Officer's recommendation I would be grateful if you would put a strong and instantly enforceable condition on such a development, so that stench like odours and noxious stinks can be fully controlled as it appears they can be under England's planning system.

While we understand the economics that force farmers into larger and larger intensive units, both they and the National Park planning committee have a responsibility to other residents in the neighbourhood who also run rural businesses or who choose to live there and who also contribute to the social and economic well being of the National Park. The Committee has an obligation to ensure that this development will not damage the quality of life and the enjoyment of properties of other residents nor lead to the destruction of other rural enterprises which benefit the economy and sustain the local population and visitor numbers.

We understand from local residents that the Committee is minded to approve this application despite the Planning Officer's recommendation. You are now informed from this email that unresolved and noxious problems from a similar set up were left for residents to deal with on their own in Ludchurch, and that a similar development, as granted by that planning authority, has left residents vulnerable, their quality of life destroyed and their property entirely blighted.

Yours sincerely

Website www.pembrokeshirecoast.org.uk

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Cllr Mike Jan

Oddi wrth:

Anfonwyd:

At:

Pwnc:

Re: Velindre Farm, St. Nicholas application for further expansion NP/14/0311

Dear Councillor James,

Further to my submission in August to the planning officer I am writing to emphasize serious concerns that I have over the above proposed development. The stretch of coast from Abermawr up to Strumble Head is some of the finest coastal scenery to be found anywhere in the world. Increasingly visitors come from all over the world to walk the coastal path. I am aware that the British dairy industry is currently facing many challenges and farmers need to be able to respond, but not by imposing costs on the surrounding community. Industrialized farming units, with associated carbon and methane footprints, are only financially viable because their environmental costs are transferred to the surrounding land, water, air, and to their neighbours and the tourists who contribute so significantly to the local economy.

The Aberbach valley, with the historic Tregwynt woollen mill at its heart, is also home to the Tregwynt nursery and the Tregwynt mansion where many events now take place, especially in the summer months. The valley is home to a vibrant community of local year-round residents and at least three cottage letting industries. It has a shuttle stop where the Puffin coastal shuttle leaves and collects walkers. It is one of the very few places in the National Park where there is such a cluster of amenities. It is a recreational area important to all the year-round residents of North Pembrokeshire. The peace and tranquillity it enjoyed before the current expansion of farming at Velindre, carried out without any prior planning permission and without the opportunity for neighbours to even know what was going on, has already been impaired. Must it be damaged even more?

I am the owner of twenty-nine acres of land in the lower Aberbach valley to the south of Velindre. The current activity at Velindre already impacts on local water and air quality and on road safety on the very narrow lanes which connect the outlying farmed areas over a distance of at least four miles. I own two cottages, Aberbach Cottage, a Grade 2 listed building close to Aberbach beach and Garn Barcud, a few hundred yards up the public footpath from the beach. I have been renting these cottages since 1980 to holiday visitors. Neither is well suited to year-round occupation but they are ideal for short lets. They are let every year steadily from Easter into the autumn, sometimes into November and again for the Christmas/New Year holiday and for occasional weeks in the winter. They are both buildings of historical significance. Garn Barcud is featured on the cover of "Small Rural Dwellings in Wales, Care and Conservation" Cadw, 2003 and is covered more extensively than any other single dwelling in the content. The larger part of my modest income comes from what I make by letting them through a local agency. Without these lets I would not be able to afford the regular maintenance that such old buildings require.

This year, for the first time ever, the first year that we know cattle have been housed indoors year round at Velindre, I have received comments from long-time regular visitors about "an awful smell pervading the entire area, right outside the cottages, along both beaches of Aberbach and Abermawr and reaching as far as the end of the headland south of Abermawr and northwards along the cliffs above Aberbach". These visitors are well educated people accustomed to and accepting of the traditional agricultural smells that are a part of farming. These smells are different, "intense odours quite unlike anything experienced before." They have noted that these smells have occurred throughout the days when slurry is now moved from Velindre and spread on Velindre and Woodlands land. These smells pass off after a day or so but it is hard to reconcile them with the renting of a cottage so close to the sea. Visitors come there because they do not

want to have to get in a car and drive elsewhere. They want to and, I think, have a right to expect to breathe sea air that smells of sea and is not contaminated with the slurry now being produced at Velindre. The current application assures us that any odours associated with the planned one acre slurry lagoon will be dispersed by the prevailing south-west winds. Since this is emphatically not what is happening whenever Velindre slurry is spread now, I am greatly troubled by the prospect of three hundred and twenty more cows housed indoors and a permanent one-acre slurry lagoon only half a mile from the coastal path a short distance north of Aberbach. If it stinks, people will not want to come and stay in my cottages.

Related to this is the issue of airborne pollutants. Residents near one of these large units in Carmarthenshire have reported an increase in rates of conjunctivitis and asthma. I am susceptible to both of these. Is this something we and our renters must now suffer? The lower Aberbach valley is one of the few small stretches of land where a great many wild creatures have found shelter amidst a sea of chemical farming. My own family has planted a variety of hardwoods over the decades and there is probably no other area in the coastal park with such varied habitat for wildlife in so small an area, marsh, blackthorn, gorse and woodland provide varied habitats for many species. It is an "e-Bird hot spot" where rare bird species can be seen. It is home to otters and the secretive water rail. It enjoys no protection other than that which we have understood the National Park provides since part of the Park's mission is to preserve and enhance the natural resources of the area for the enjoyment of all. I am very apprehensive as to what the regular spreading of slurry on land so near to it may be already doing to the amphibians who live in it. These sensitive "indicator species" are highly susceptible to airborne pollution. We know that ammonia is a Level 2 toxin and we know that ammonia is released during the slurry spreading. What insidious effects may already be taking place in this important wildlife habitat? The world has lost half its wildlife since the 1970s and Pembrokeshire is no exception. In my lifetime the population of songbirds in the valley has been decimated by invasive mink, escapees from mink farms, and invasive grey squirrels. Must we now impose on these creatures and all the others who have found shelter there, who cannot speak for themselves, a toxic burden they may not be able to survive?

Another major issue is that of water quality. We know that slurry has spilled into the Aberbach stream, on one occasion last October so badly that the stream ran brown with it and the stench could be smelled on Abermawr beach. Another occurred the day after Prince Charles dedicated the newly refurbished water wheel at Tregwynt Mill. One family of regular visitors who have been coming to Aberbach since the 1950s will no longer swim in Aberbach bay. They all got very sick after swimming in the bay and are convinced that the cause was a pathogen carried down the stream from Velindre. Others are shifting to swim at Abermawr which is only a safe bathing beach when the sea is calm. There is a strong undertow at Abermawr which can be dangerous, especially to visitors who do not know this.

Those of us living and running our own small-scale businesses in the valley which are in harmony with the mission of the National Park are struggling to cope with the burdens already placed on us by what is now happening at Velindre. We have no powerful advocates to back us in the decision-making process as farmers do. Visitors to the National Park bring in approximately £500 million annually which benefits the entire county, and the tourist industry is relatively labour intensive. Our financial future and the ecology of this particularly sensitive area of the National Park is in your hands. I urge you to support your own planning officer's strong recommendation to refuse permission for any further expansion at Velindre because the industrial scale of the proposed expansion, with its associated impact on wildlife and local amenities, is totally out of place in an environmentally sensitive area. Approval of this application would open the whole of the coastal National Park to industrial-type farming and would irreparably damage this priceless natural asset. Is this a path we can afford to take?

45

DC Team shared mailbox

From:
Sent: 06 October 2014 21:02
To: DC Team shared mailbox
Cc: Cllr Owen James; Ted Sangster; Cllr Bob Kilmister
Subject: Velindre Farm Development NP140311

To all concerned,

I am writing to object to the proposed development and slurry lagoon at Velindre Farm.

I have spent many holidays in the beautiful and unspoilt Pencaer area over the years since childhood and feel that the proposed development will be unsightly, pollute the air, cause an unnecessary increase in traffic on narrow lanes and, above all, surely goes against everything that the National Park Authority represents and sets out to achieve.

Please consider the negative impact that this development will have on a truly special part of the pembroeshire coast and ensure that this development does not take place now or in the future.

Yours sincerely

Pembrokeshire Coast
National Park Authority
- 7 OCT 2014
Awdurdod Parc Cenedi
Arfordir Penfro

AK
7/10/14



DC Team shared mailbox

From: [redacted]
Sent: 06 October 2014 23:16
To: DC Team shared mailbox
Subject: Ref: NP140311

Pembrokeshire Coast
National Park Authority
- 7 OCT 2014
Awd...
iaethol
ACK 7/10/14

Dear Liam Jones,

I wish to object to the above proposed slurry farm development at Velindre Farm, Pencaer.

Having personally enjoyed the unique character of this area of outstanding natural beauty as a visitor, the idea of a development of this nature surely goes completely against the guiding principles set out in your own LDP.

- *Conservation and enhancement 'to conserve and enhance the natural beauty wildlife, and cultural heritage of the National Parks.'*
- f- *Understanding and enjoyment 'to promote opportunities for the understanding and enjoyment of the special qualities [of the Parks] by the public.'*

Simply, how does this proposal enhance the natural wildlife and how will the public's understanding (especially visitors) of a large slurry lagoon promote their understanding of the Park's special qualities?

As for the necessary economic development of the area - *'foster the economic and social well-being of local communities, within the National Park..'* - is this not for an individual business benefit with minimal advantage for local employment?

Environmentally you will be adding a lethal contribution to the fabric of the area. Farming is already the UK's most dangerous occupation and slurry related incidents are one of the top reasons for deaths on farms, mainly by fumes. How is this low impact? What example does this set as a National Park? The risk of contaminating local water courses is also to be considered.

The landscape will be permanently affected by this development and only deteriorate with time as structures corrode and if the area is allowed to extend further once established.

Intensive dairy farming is detrimental to the welfare of cattle, much shorter lives, prone to disease, permanently housed and reliant on concentrated feeds.

Please include this objection when discussing this proposal.

Your sincerely

26 SEP 2014

National Park Authority

E.

SSR

Mr. Liam Jones

Ref: NP140311.

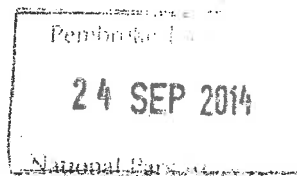
Velindre Farm, Pembrokeshire

Dear Mr. Jones.

As a regular walker along the coastal path I am very much against any plans to build a large slurry lagoon at Velindre Farm. The stirring, handling and spreading this "slurry" would create emissions of ammonia methane, hydrogen sulphate and other airborne pathogens. The heavy traffic along narrow lanes would not only be dangerous to other traffic and walkers, but also damage hedgerows and trees. It would be clearly visible from the look-out at Pwl Deri; I am surprised these plans are even being considered. This is a designated area of ecological sensitivity.

The Pembrokeshire coastal path is popular with thousands of visitors from world wide creating great benefit to the local tourist economy. I doubt they would be happy to know this lagoon is only 220 metres from the nearest home, and 800 metres from St. Nicholas, which must be a great worry to everyone who lives there and in the surrounding area.

Yours Faithfully,



Ref. Development at Velindre Farm (NP140311)

Dear Liam Jones,

In considering the proposed development at Velindre Farm, comprising cattle accommodation and a slurry lagoon, I urge you to consider at length the long term, negative impact such a development will have on this area and to carry out a full environmental appraisal.

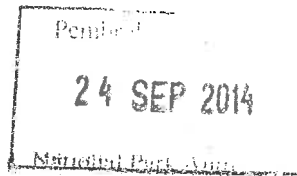
I am an artist. The North Pembrokeshire landscape, and in particular the area of Pencaer, has been an inspiration to me for forty years. While certain changes are inevitable over time, I cannot see how the detrimental visual impact of a 1.1 acre slurry lagoon, visible from the coastal path south of Pwll Deri, can be justified under the National Park's principle of conserving and enhancing the natural beauty, wildlife and heritage of this unspoilt area.

In addition to this, the single track lanes and narrow roads which will give access to this development are surely not suitable for the heavy vehicular traffic which will ensue.

The airborne pathogens from the slurry lagoon such as ammonia, hydrogen sulphide and methane can only have a harmful effect on this designated area of ecological sensitivity.

For these reasons, I object to the above development and urge you to refuse planning permission.

Yours sincerely,



Dear Liam Jones,

I am writing to express my deep concern about the proposed development, NP140311, to extend the cattle accommodation at Velindre Farm, Pencaer and as a result of this to build a large slurry lagoon.

In the 20 years that I have been visiting this area of Pembrokeshire, walking the coast path, breathing the clean air and enjoying the wildlife, I thought that this unspoilt area was safe in the hands of the National Park Authority. Do you really consider that the narrow lanes are really suitable for the increase in heavy lorries? Is an acre of slurry really going to be an attractive addition to the view? The release of poisonous chemicals during the handling of the slurry will pollute the air.

I object to this development and ask you to refuse planning permission.
Let us keep this very special area unspoilt for as long as we can.

Yours sincerely,



NP/14/03/1

SAB4 OJA

23 SEP 2014

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Dear Mr Hayward

I am writing to you as a native of Pencaer and a householder in the National Park. I object strongly to the application to extend the industrial dairy unit at Velindre. The existing development is completely incompatible with its position in the National Park and already causes huge problems to both other local farmers and residents and visitors. Slurry tankers travelling at 40mph every 3 minutes on an unclassified road are both a danger to other road users and the environment.

I was very disappointed that the committee failed to endorse Mr. Brian Jones' recommendation at the meeting on Sept 10th. How can the National Park even imagine that the extension of the industrial dairy unit + the proposed waste slurry lagoon can be compatible with the purpose and ethos of the Park.

Yours sincerely

GENERAL MAIL SYSTEM	
Date Recd:	15-9-14
Record No: 23363 To:	LS
Community:	PENYCAE
Reply Target:	5-10-14
Date of Reply:	Pemb. keshire Coast
History Files:	15 SEP 2014 (14/0311)
Ref: NP/14/0311	Ent: Yes/No Ent: Yes/No Pen: Yes/No

September 11th 2014

Dear Mr. Jones,

Firstly, I would like to commend you on your decision to recommend the refusal of planning application NP/14/0311, particularly as there were no objections from any consultees apart from The National Trust, who I believe wrote of their concern. It was a very bold decision and one which I appreciate was made because of your belief that such a development is not conducive to the ethos of the National Park and it would cause the loss of amenity to local residents and visitors. For that I am grateful.

Secondly, to give further credence to your decision, a few points have come to mind which may be helpful if portrayed to committee members before/during the site meeting.

- A panoramic view of the buildings at Velindre can be seen from the gateway on the left at the crossroads just before the village of St. Nicholas as you enter from the main road. Another great view of the proposed lagoon is from Garn Fawr, or the car park there, where no amount of hedging would disguise it.
- It would be worth reminding committee members, that as they travel along the single track roads and negotiate blind bends, they are at any time likely to encounter 44 ton HGVs, articulated lorries and tractors pulling heavily laden trailers, as we who live or visit here must on a daily basis.
- Committee members should definitely be shown the route to the two satellite farms to appreciate the distance involved, where the spreading/storage of slurry is and would be necessary, in particular to Woodlands Farm, where the route would take you down a steep hill, over an ancient bridge, up the other side and past the historical, listed building Tregwynt Mansion. All the time, being prepared to meet convoys of slurry tankers.
- As the difficulties become apparent, it should become clear to see that damage done to ancient hedgerows is unavoidable.
- Velindre West, situated at the entrance to the proposed slurry lagoon site, is also the access point to the lagoon and the footpath to the coast path which is of noteworthy mention. Can you imagine conditions for the resident during construction, let alone afterwards?
- It should be clear to all site visitors that the odour and gas emissions from the lagoon, will definitely be a loss of amenity to local residents and visitors, as will the noise and light pollution.
- The close proximity of the stream at Velindre Farm to the huge buildings and cattle holding yards, is worthy of a mention, due to runoff in extreme weather.

It was not mentioned at yesterday's meeting whether the analysis of the clay samples had been received and what the outcome was. I can only assume they must have been favourable for the applicant, as such, being of suitable quality and quantity, otherwise there would be no case.

I hope you receive this letter with the intention in which it was written, namely to add support to your decision that a major development of this kind has no place in The National Park and the tranquillity and remoteness of the area would certainly be lost if it was to be approved.

Yours sincerely,