

Screening Directions for Trewern Farm – NP/15/0417

The two following letters from Welsh Government are included as further information for members of the Development Management Committee in relation to the progress of one current and one prospective application at Trewern Farm, Newport.

Application NP/15/0417 relates to a largely retrospective application for a slurry lagoon, silage clamps and a number of agricultural buildings.

The second letter relates to a proposed siting for an Anaerobic Digestion Plant to the north of the existing farm complex and across the road, but a formal application for this site has not yet been made.

Following the issue of Screening Opinions relating to the need for applications to be accompanied by an Environmental Impact Assessment by officers of this Authority, the applicant's agent requested formal Screening Directions from Welsh Government which have confirmed the Local Authority Opinion.

The application is effectively put on hold following the issue of a positive Screening Direction until the Environmental Statement (ES) is received. Once the ES is received, a sixteen week period for determination follows and the application will be brought to Committee.



Alex Lawrence
Reading Agricultural Consultants
Beechwood Court
Long Toll
Woodcote
Reading RG8 0RR

By email to: Alex.Lawrence@readingagricultural.co.uk

Ein Cyf/Our Ref: qA1233224
Eich Cyf/Your ref: 6818WAG1
Dyddiad/Date: 20 January 2016

Dear Sir

TOWN AND COUNTRY PLANNING ACT 1990
TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
(ENGLAND AND WALES) REGULATIONS 1999 (AS AMENDED)
PROPOSED CATTLE ACCOMMODATION BUILDINGS, SLURRY LAGOON, SILAGE
CLAMPS AND OPEN YARD AREAS (PART RETROSPECTIVE) AT LAND AT TREWERN
FARM, FELINDRE FARCHOG, CRYMYCH, PEMBROKESHIRE

1. I refer to your request received on 11 November 2015, made pursuant to regulation 5(6) of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (“the 1999 Regulations”) for the Welsh Ministers to make a screening direction as to whether or not the development your clients propose is ‘EIA development’ within the meaning of the 1999 Regulations and whether an environmental statement is required.
2. I am authorised by the Minister for Natural Resources to consider and make the screening direction.
3. The development proposed, namely “*cattle accommodation buildings, slurry lagoon, silage clamps and open yard areas (part retrospective)*”, falls within the description at paragraph 1(c) of Schedule 2 to the 1999 Regulations. Since the proposal exceeds the threshold in column 2 of the table in Schedule 2 to the 1999 Regulations, I consider your proposal to be “Schedule 2 development” within the meaning of the 1999 Regulations.
4. The views of Cadw and Natural Resources Wales (NRW) were sought and their advice is attached at Annexes A and B to the EIA checklist (also attached), which identifies the key areas which the Welsh Ministers considered when reaching their conclusion.

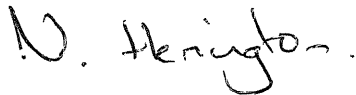
5. Having taken into account the criteria in Schedule 3 to the 1999 Regulations and the advice offered by Cadw and NRW, which I accept, I am of the opinion that the proposal is likely to have significant effects on the environment for the following reasons:
- likely impact on the setting of the following Scheduled Ancient Monuments:
Pentre Ifan (PE008), Carn Ingli Camp (PE011), Carn Ingli Round Barrows (PE019), Enclosure in Ty Canol Wood (PE481) and Pentre Ifan Standing Stone (PE501).
 - likely impact on the setting of the following Listed Buildings:
Grade II* - Trewern (12808)
Grade II - Privy at Trewern (12809) , Stable Block at Trewern (12810) ,
Outbuildings by pond west of Trewern (12811), Pentre Evan Farmhouse and
Outbuilding (12800) and Former Barn at Pentre Evan Farm (12801).
 - the likely impact on:
 - Gallt Llannerch- Coed Gelli-deg SSSI, part of North Pembrokeshire Woodlands SAC
 - Alit Pontfaen- Coed Gelli-fawr SSSI, part of North Pembrokeshire Woodlands SAC
 - Ty Canol SSSI, part of North Pembrokeshire Woodlands SAC
 - Carn Ingli SSSI
 - Mynydd Preseli SSSI & SAC
 - Pengelli Forest and Pant-teg Wood SSSI, part of North Pembrokeshire Woodlands SAC
 - Felin Llwyngwair SSSI, part of Pembrokeshire Bat Sites and Bosherton Lakes SAC
6. Accordingly, in exercise of the authority referred to in paragraph 3 above, powers contained in Regulation 5(6) and 6(4) of the 1999 Regulations and for the reasons given in the EIA checklist, I hereby direct that the proposed development is 'EIA development' within the meaning of the 1999 Regulations. This letter constitutes the statement required by regulation 4(6)(i).
7. Any application for planning permission for this development must be accompanied by an Environmental Statement. Under regulation 2(1) of the 1999 Regulations an Environmental Statement must contain, for the purpose of assessing the likely impact on the environment, the information specified in that regulation. I recommend that you refer to the Regulations and the accompanying Circular, Welsh Office Circular 11/99, before and during the preparation of the Environmental Statement.
8. Guidance on the preparation of Environmental Statements was issued by the former Department of the Environment, Transport and the Regions and entitled "Preparation of Environmental Statements for Planning Projects that require Environmental Assessment:

A Good Practice Guide” (HMSO, £15.00, ISBN 9780117532076). This guidance is still available and may be of use to you, although the statutory provisions mentioned in the guidance have been superseded.

9. You should bear in mind that my opinion on the likelihood of the development having significant environmental effects is reached only for the purposes of this direction.

10. I am sending a copy of this letter to Pembrokeshire Coast National Park Authority, Cadw and NRW.

Yours faithfully,

A handwritten signature in black ink that reads "N. Hemington." The signature is written in a cursive style with a period at the end.

Neil Hemington
Chief Planner/Deputy Director
Planning Directorate
Department for Natural Resources

STAGE 1 – INITIAL SCREENING ASSESSMENT

1		Case Details	
A	Appeal case reference (PINS Only)		
B	LPA case reference NP/15/417		
C	LPA Pembrokeshire Coast National Park Authority		
D	Appellant/Applicant Mr M Watkins		
E	Site address Trewern Farm, Felindre, Crymych, Pembrokeshire		
F	Brief description of development Cattle accommodation buildings, slurry lagoon, silage clamps and open yard area (part retrospective)		
G	Site area of development/works/new floorspace (as appropriate), i.e. m2 or hectares (Ha) Approx 1.52ha		
H	Approval of reserved matters or conditions? If yes, state which one na		
I	If Yes, enter the description of development subject of the related planning permission		
J	Is the project located wholly or partly within a 'Sensitive Area' as defined by Regulation 2 of the EIA Regulations? If Yes, state which area below. While the site is not in a 'sensitive area' as defined by regulation 2 of the EIA Regulations 1999, it is noted that the slurry spreading operations may impact on 'sensitive areas'	Yes	No

EIA Screening Details

2			
2A		Schedule 1	
(i)	Is the project Schedule 1 development as described in Schedule 1 of the EIA Regulations?	Yes	No
(ii)	<i>If Yes, under which description of development i.e. Nos. 1 -21? Go to Section 8 and tick Recommended Action 8A/B 'EIA Required'. If No, consider whether project is 'Schedule 2' development below in part 2(B).</i>		
2B	Schedule 2		
(i)	Is the project listed as a description of development under Column 1 of the table in Schedule 2 of the EIA Regulations?	Yes	No
	<i>If Yes, note under which description of development i.e. paragraphs 1-12. If No, complete section 3 -5 and then proceed to Section 8 and tick Recommended Action 8L 'EIA Not Required' as the project does not fall within the EIA Regulations i.e. it is not Schedule 2 development and is not EIA development.</i>		
	Schedule 2.1(c) – Intensive livestock installations		
(ii)	Does the project change or extend development described in paragraphs 1 to 12 of Column 1 of schedule 2? <i>If Yes, proceed straight to part 2C. If No, proceed to point (iii) below.</i>	Yes	No
(iii)	Is the project located wholly or partly within a 'Sensitive Area' as defined by Regulation 2 of the EIA Regulations? <i>If Yes, state which area and proceed to Section 3 as project is 'Schedule 2 development'. There is no need to consider thresholds/criteria. If No, proceed to point (iv) below.</i>	Yes	No
(iv)	Are the applicable thresholds/criteria in Column 2 exceeded/met? <i>If Yes, note which applicable threshold/criteria and proceed to Section 3 as project is 'Schedule 2 development'. If No, complete section 3-5 and then proceed to Section 8 and tick Recommended Action 8L 'EIA Not Required' as the project does not fall within the EIA Regulations i.e. it is not Schedule 2 development and is not EIA development.</i>	Yes	No
	Area of new floorspace exceeds 500m²		

2C		Changes or extensions to Schedule 1 or Schedule 2 development	
(i)	Does the project involve any change to or extension of development of a description listed in Schedule 1 (other than a change of extension falling within paragraph 21 of that Schedule) or in paragraphs 1 to 12 of Column 1 of the table in Schedule 2, where that development is already authorised, executed or in the process of being executed, and the change or extension when considered with the existing development as a whole, may have significant adverse effects on the environment? Provide reasons for your answer in the space below.	Yes	No
	<p><i>If Yes indicated above, proceed to point (ii). If No, complete section 3-5 and then proceed to Section 8 and tick Recommended Action 8L 'EIA Not Required' as the project does not fall within the EIA Regulations i.e. is not Schedule 2 development and is not EIA development.</i></p>		
(ii)	Is the project located wholly or partly within a 'Sensitive Area' as defined by Regulation 2 of the EIA Regulations? <i>If Yes, proceed to Section 3 as project is Schedule 2 development under paragraph 13(a) of Column 1 of Schedule 2. There is no need to consider thresholds/criteria. If No, proceed to point (iii) below.</i>	Yes	No
		<p>For development of a description mentioned in Column 1 of the table in Schedule 2 (paragraphs 1-12) - Are the applicable thresholds/criteria in Column 2 of that table as applied to the change or extensions (and not to the development as changed or extended) met or exceeded? Tick 'Yes' or 'No' below.</p> <p>For development of a description mentioned in a paragraph in Schedule 1 as indicated in Column 1 of the table in Schedule 2 under paragraph 13(a) - Are the corresponding thresholds/criteria in Column 2 of that table (as indicated in Column 2 under paragraph 13(a)) met or exceeded? Tick 'Yes' or 'No' below.</p>	
(iii)		Yes	
		No	
(iv)	If Yes indicated above, note below which applicable threshold/criteria is exceeded/met and proceed to Section 3 as project is Schedule 2 development under paragraph 13(a) of Column 1 of Schedule 2. If No, complete section 3-5 and then proceed to Section 8 and tick Recommended Action 8L 'EIA Not Required' as the project does not fall within the EIA Regulations i.e. is not Schedule 2 development and is not EIA development.		

LPA / Welsh Ministers Screening - All Applications Including Reserved Matters/Conditions		
3		
(i)	Has the LPA issued a Screening Opinion (SO)?	Yes No
(ii)	Have the Welsh Ministers issued a Screening Direction (SD)?	Yes No
(iii)	If Yes to either, is a copy of the SO/SD on the file? Note which one. SO of lpa on file	Yes No
(iv)	If Yes, is the SO/SD positive i.e. EIA is required?	Yes No
4	Reserved Matters/Conditions Applications Only	
(i)	Was the original planning permission subject to EIA screening?	Yes No
(ii)	Was a SO/SD issued for the original planning permission?	Yes No
(iii)	If Yes, is a copy of the SO/SD for the original planning permission on file?	Yes No
5	Environmental Statement (ES)	
(i)	Has the applicant/appellant supplied an ES for the current or previous (if reserved matters or conditions) application?	Yes No

STAGE 2 – DETAILED SCREENING ASSESSMENT

Screening Questions				
6(A).	Part 1 - Questions to be considered	Part 2 – Provide answers to questions in Part 1 (use Yes/No/Not Known) and briefly explain reasoning. If applicable, and/or known, include name of feature and approximate proximity to site	Part 3 – For all ‘Yes’ answers in Part 2, assess whether those interactions (i.e. effects) are likely to be <u>significant</u> by considering them against the ‘Assessment of Significance’ (‘AoS’) Criteria outlined in Section 6(B). Provide detailed reasons for your answers here. Include in your answers a summary of advice from consultees if received. [NB. If answer in Part 2 is ‘No’ use ‘NA’ and proceed to section 7.]	Part 4 – Outline the overall conclusion reached in Part 3 i.e. Unlikely to have a significant effect / Likely to have a significant effect?
CRITERION 1. CHARACTERISTICS OF DEVELOPMENT				
Question 1(a) Size of the Development				
	<p>Will construction, operation or decommissioning of the Project involve actions which will cause physical changes in the locality (topography, land use, changes in waterbodies, etc.)?</p>	<p>Yes. The development involves the construction of the following on site with a total area of approx. 1.52ha:</p> <ul style="list-style-type: none"> • 11 buildings used for cattle accommodation and storage (retrospective) • Extension to existing cattle accommodation buildings • Slurry lagoon • Silage clamp (retrospective) • New silage clamp 	<p>The physical changes will be those associated with the erection/construction and operation of the cattle accommodation and storage buildings, silage clamps and a slurry lagoon.</p>	<p>Unlikely significant effect.</p>

Question 1(b) Cumulation with Other Development

<p>(i) Are there any other factors which should be considered such as consequential development which could lead to environmental effects or the potential for cumulative impacts with other existing or planned activities in the locality?</p>	<p>Yes. An Anaerobic Digestion Plant is proposed for an adjacent site at Trewen Farm (NP/15/0582).</p> <p>The LPA have indicated that they are expecting a retrospective application to be submitted for 6 static caravans housing workers to the dairy shortly. There is also a retrospective two storey extension to the farmhouse currently under consideration NP/15/0642.</p>	<p>I have considered the cumulative effects of these proposals in conjunction with the AD plant (including the retrospective applications). I conclude that the proposal would not have a cumulative impact and would not have a significant impact on the environment.</p> <p>Application NP/15/0582 has also been screened and it is concluded that EIA is required.</p>	<p>Unlikely significant effect.</p>
<p>(ii) Are there any plans for future land uses on or around the location which could be affected by the project?</p>	<p>Yes. Works involving connection of the proposed AD plant to the electricity grid.</p>	<p>It is not considered that the effect of this development is likely to be significant.</p>	<p>Unlikely significant effect.</p>
<p>(iii) Is the Project likely to lead to transfrontier effects?</p>	<p>No.</p>	<p>N/A</p>	
<p>Question 1(c) Use of Natural Resources</p>			
<p>Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or in short supply?</p>	<p>Yes. Small take up of agricultural land (1.52 ha).</p>	<p>It is not considered that the effect of this development is likely to be significant.</p>	<p>Unlikely significant effect.</p>

Question 1(d) Production of Waste			
Will the Project produce solid wastes during construction or operation or decommissioning?	Yes. There may be construction waste.	It is not considered that the effect of this development is likely to be significant.	Unlikely significant effect.
Question 1(e) Pollution and Nuisances			
(i) Will the Project involve use, storage, transport, handling or production of substances or materials which could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?	No.	N/A	
(ii) Will the Project release pollutants or any hazardous, toxic or noxious substances to air?	Yes. It is likely that there will be emissions of ammonia to the atmosphere.	Advice received from Natural Resources Wales was: "It is likely that there are emissions of ammonia to the atmosphere which could impact upon lichens, which are qualifying features of at Ty Canol Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR). It is possible that effects could be mitigated by tree-planting around the site, but an assessment will be required to show both the effects and the required mitigation methods. Air quality monitoring is carried out at Ty Canol Natural Nature Reserve (NNR), so data could possibly be made available to inform such an assessment."	Likely to have a significant effect
	Combustion of fossil fuels from construction plant and vehicles.	The full advice of NRW was provided in their letter of 14 December which is attached as Annex B. Scale of development is such that volume of traffic and therefore emissions, will not be significant	Unlikely to have a significant effect Unlikely to have

	Dust may be produced by construction vehicles.	Scale of development is such that dust from vehicles will not be significant.	a significant effect
(iii) Will the Project cause noise and vibration or release of light, heat energy or electromagnetic radiation?	No.	N/A.	
(iv) Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	No.	N/A	
Question 1(f) Risk of accidents, having regard in particular to substances or technologies used			
Will there be any risk of accidents during construction or operation of the Project which could affect human health or the environment?	Yes	Possibility of accidents during construction phase but Health and safety requirements and legislation would be the appropriate method for dealing with this issue.	Unlikely to have a significant effect
		It is not considered that the effect of this development is likely to be significant.	
CRITERION 2. LOCATION OF DEVELOPMENT			
Question 2(a) Existing Land Use			
(i) Will the Project result in social changes, for example, in demography, traditional lifestyles, employment?	No.	N/A	
(ii) Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	No.	N/A	
(iii) Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	No.	N/A	

(iv) Is the project located in a previously undeveloped area where there will be loss of greenfield land?	Yes.	See 1(c) above	Unlikely to have a significant effect
(v) Are there existing land uses on or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying which could be affected by the project?	Yes.	The nearest dwellings are approx. 380m to the south east at Pentre Evan, Sychpant 520m to the west, Dolbont 460m to the south west and Argoed and Coed-Cadw approx. 810m to the north-east. No evidence has been submitted by NRW to indicate that the proposals would have a significant effect on these residential properties.	Unlikely to have a significant effect
(vi) Are there any areas on or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities, which could be affected by the project?	No.	N/A	
Question 2(b) Relative Abundance, Quality and Regenerative Capacity of Natural Resources in the Area			
Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project?	No.	N/A	

Question 2(c) Absorption Capacity of the Natural Environment			
(i) Are there any areas on or around the location which are protected under international or national or local legislation for their ecological, landscape, cultural or other value (i.e. historical), which could be affected by the project?	Yes.	The following SSSIs and SACs are located in nearby areas:	Likely to have a significant effect
		<p>The following SSSIs and SACs are located in nearby areas:</p> <ul style="list-style-type: none"> • North Pembrokeshire Woodlands SAC; • Pembrokeshire Bat Sites and Bosherton Lakes SSSI; • Carn Ingli SSSI; • Coed Ty--Canol SSSI; • Felin Llwyngwair SSSI; and • Gallt Llanerch – Coed Gelli-Deg SSSI. <p>Natural Resources Wales (NRW) advised that:</p> <p><u>Possible impacts of slurry spreading.</u></p> <p>There are several SSSIs with sensitive features adjacent or close to areas covered by slurry spreading agreements, or in the farm's ownership. These are:-</p> <ul style="list-style-type: none"> • Galt Llanerch- Coed Gelli-deg SSSI (lichens are qualifying features), part of North Pembrokeshire Woodlands Special Area of Conservation (SAC) • Ailt Pontfaen- Coed Gelli-fawr SSSI (lichens are qualifying features), part of North Pembrokeshire Woodlands SAC • Ty Canol SSSI I NNR (lichens are qualifying features), part of North Pembrokeshire Woodlands SAC • Carn Ingli SSSI (sensitive to nutrient inputs) 	

		<ul style="list-style-type: none"> • Mynydd Preseli SSSI & SAC (sensitive to nutrient inputs) <p>There are also two important bat sites with key foraging areas that could be affected by the spreading:-</p> <ul style="list-style-type: none"> • Pengelli Forest and Pant-teg Wood SSSI, part of North Pembrokeshire Woodlands SAC (barbastelle bat feature) • Felin Llwyngwair SSSI, part of Pembrokeshire Bat Sites and Bosherton Lakes SAC (greater horseshoe bat feature) <p>The barbastelle is a moth specialist that forages over diverse grassland, and the greater horseshoe feeds on large insects such as chafers and moths over grassland. Any agricultural improvement of grassland around these sites by application of slurry could affect the availability of insect prey. Past bat surveys have shown that barbastelles were feeding over grassland to the west of Pengelli Forest, in particular. Both species can travel up to 16km in a single night to forage, but they have 'key sustenance zones' that are closer to the roosts and are particularly important.</p> <p>We welcome the statement that slurry spreading can be avoided on sites adjacent to SSSIs, so it is essential that we see a copy of the Manure Management Plan to assess the detail. Similarly, we are pleased that slurry injection is undertaken, but is this the only means of slurry application all year round? This question needs clarification.</p>	
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		<p>In our opinion we think that the planning application(s) should be subject to a Habitats Regulations Assessment, for possible impacts on the North Pembrokeshire Woodlands SAC (oak woodland .feature and barbastelle bat feature) and Pembrokeshire Bat Sites and Bosherton Lakes SAC (greater horseshoe bat feature).</p> <p>The question of whether an EIA is required is naturally one for your selves but there does appear to be potential for environmental consequences associated with the current proposed development/possibly partially constructed development which may need careful consideration and assessment.”</p> <p>Having regard to the advice given by NRW regarding the potential effect of the proposed development on environmentally sensitive locations, it is considered that due to the number of SSSIs with sensitive features in close proximity to the site and the impact of ammonia emissions and slurry spreading, the potential impact of the development on these sensitive areas is likely to be significant.</p> <p>The full advice of NRW was provided in their letter of 14 December 2015 which is attached as Annex B.</p> <p>The proposal site is situated within 3km of 23 Scheduled Ancient Monuments and 61 grade II and grade II* Listed Buildings.</p>	<p>Likely to have a significant effect</p>
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		<p>The advice provided by Cadw was:</p> <p>“By way of background, we have previously been consulted by Pembrokeshire Coast National Park Authority on the planning application and been asked to provide a scoping opinion. I attached a copy of our replies.</p> <p>We have now assessed the characteristics of this proposed development and its location within the historic environment, in particular, the likely impact on designated or registered historic assets of national importance including scheduled monuments, listed buildings, registered historic parks, gardens and landscapes.</p> <p>The farm complex has increased in size since 2000, when Ordnance Survey maps indicate that the farm building and yards covered an area of circa 0.54ha. In 2009 the Ordnance Survey map shows building and yards covering some 0.73ha. This current application covers an area of 3.3ha with most of the structures already constructed. This is a significant increase in size, with buildings up to 10m high, resulting in a development that has become a notable feature within the landscape.</p> <p>Our records show that the following historic assets are potentially affected by the proposal:</p> <p>Listed Buildings – Grade II* - Trewern (12808). Grade II - Privy at Trewern (12809), Stable Block at Trewern (12810), Outbuildings by pond west of Trewern (12811), Pentre Evan Farmhouse and Outbuilding (12800) and the</p>	
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		<p>Former Barn at Pentre Evan Farm (12801).</p> <p>Scheduled Monuments Pentre Ifan(PE008), Carn Ingli Camp(PE011), Carn Ingli Round Barrows(PE019), Enclosure in Ty Canol Wood(PE481) and Pentre Ifn Standing Stone(PE501).</p> <p>Registered Historic Landscape HLW (D) 7 – Preseli</p> <p>Our Senior Archaeological Planning Officer has provided the following advice:</p> <p>“The complex of listed buildings at Trevern is located within 200m of the development. The main frontage of the grade II* Trevern farmhouse faces towards the development and is therefore likely to have a significant impact on its setting. A similar impact is likely to be expected on the associated grade II listed buildings at Trevern.</p> <p>The former barn at Pentre Evan is located some 350m southeast from the proposed development. Its frontage faces north and therefore whilst the proposed development is likely to be detrimental to its setting, the impact is not likely to be significant impact.</p> <p>The farm complex is clearly visible in identified significant views from the scheduled monuments known as Pentre Ifan (1.4km to the southeast of the application area), Carn Ingli Camp (2.4km to the southwest of the application area) and Pentre Ifn Standing Stone (1.53km to the southeast of the application area). The complex is also clearly visible in views from the scheduled monuments known as Carn Ingli Round Barrows (2.28km to the west of</p>	
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		<p>the application area) and the Enclosure in Ty Canol Wood (1.43km to the south of the application area).</p> <p>The application buildings have added a modern large industrial sized complex into a rural landscape and into identified significant views from the scheduled monuments known as Pentre Ifan, Carn Ingli Camp and Pentre Ifn Standing Stone. There is likely to be a significant impact on the setting of these scheduled monuments.</p> <p>Conclusion</p> <p>The proposed development is likely to have a significant impact on the settings of the scheduled monuments known as Pentre Ifan, Carn Ingli Camp and Pentre Ifn Standing Stone and also on the setting of the grade II* listed building Trewern and its associated listed buildings (i.e. the Privy, stable block and the outbuildings by Pond west).</p> <p>The supporting statement/ policy appraisal submitted with the planning application discusses the historic environment and cultural heritage from paragraph 41 onwards. This appraisal suggests that a landscaping scheme, which could be conditioned as part of any permission, has the potential to significantly improve the setting of the listed buildings at Trewern by screening the permitted and proposed farm buildings. We agree that appropriate landscaping, secured by way of a condition attached to any planning permission, may provide a means to mitigate the impact of the proposed development on the historic assets discussed above but this option has not been fully analysed by the applicant.</p>	
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		<p>On balance, we consider that the development is likely to have a significant impact on the setting of a number of nationally important historic assets to trigger the requirement for an EIA. If, however, you determine that an EIA is not required the applicant should in any case produce a detailed assessment by an accredited expert analysing the full impact of the development on the setting of the aforementioned historic assets, along with any proposed mitigation that may be considered necessary to alleviate the significance of the impact."</p> <p>The full advice of Cadw was provided in their minute of 9 December 2015 which is attached as Annex A.</p>	
<p>(ii) Are there any other areas on or around the location which are important or sensitive for reasons of their ecology e.g. wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands, which could be affected by the project?</p>	<p>No.</p>	<p>N/A</p>	
<p>(iii) Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the project?</p>	<p>Yes.</p>	<p>See the advice of NRW at 2(c)(i) which gives details of SSSIs and SACs around the site which contain sensitive species of flora and fauna.</p>	<p>Likely to have a significant effect</p>
<p>(iv) Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?</p>	<p>No.</p>	<p>N/A</p>	

<p>(v) Are there any areas or features of high landscape or scenic value on or around the location which could be affected by the project?</p>	<p>Yes. The site is located just outside the registered Preseli Landscape of Outstanding Historic Interest which could potentially be affected by the project.</p>	<p>The advice of Cadw was: "The application site is located outside the registered Preseli Landscape of Outstanding Historic Interest. While the application buildings have added a modern large industrial sized complex into a rural landscape, there is likely to be a limited impact on the overall registered historic landscape. " The full advice of Cadw was provided in their minute of 15 December 2015 which is attached as Annex A.</p>	<p>Unlikely to have a significant effect</p>
<p>(vi) Is the project in a location where it is likely to be highly visible to many people?</p>	<p>No.</p>	<p>N/A</p>	
<p>(vii) Are there any areas or features of historic or cultural importance on or around the location which could be affected by the project?</p>	<p>Yes.</p>	<p>See the advice of Cadw at 2(c)(i) and Annex A which stated that the project "is likely to have a significant impacts on the setting of a number of nationally important historic assets to trigger the requirement for an EIA".</p>	<p>Likely to have a significant effect</p>
<p>(viii) Are there any areas on or around the location which are densely populated or built-up, which could be affected by the project?</p>	<p>No.</p>	<p>N/A</p>	
<p>(ix) Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project?</p>	<p>No.</p>	<p>N/A</p>	

<p>(x) Is the project location susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?</p>	<p>No.</p>	<p>N/A</p>	
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6(B). **Assessment of Significance (AoS) Criteria**
TO BE USED ONLY IF ANSWERS IN PART 2 (COLUMN 2) OF SECTION 6(A) ARE 'YES'

1.	Will there be a large change in environmental conditions?
2.	Will new features be out-of-scale with the existing environment?
3.	Will the effect be unusual in the area or particularly complex?
4.	Will the effect extend over a large area?
5.	Will there be any potential for transfrontier impact?
6.	Will many people be affected?
7.	Will many receptors of other types (fauna and flora, businesses, facilities) be affected?
8.	Will valuable or scarce features or resources be affected?
9.	Is there a risk that environmental standards will be breached?
10.	Is there a risk that protected sites, areas, features will be affected?
11.	Is there a high probability of the effect occurring?
12.	Will the effect continue for a long time?
13.	Will the effect be permanent rather than temporary?
14.	Will the impact be continuous rather than intermittent?
15.	If it is intermittent will it be frequent rather than rare?
16.	Will the impact be irreversible?
17.	Will it be difficult to avoid, or reduce or repair or compensate for the effect?

7		Conclusion
Summary of features of project and of its location		
a	Characteristics of development	
(i)	<p>The construction of the following on a site with a total area of approx. 1.52ha:</p> <ul style="list-style-type: none"> • 11 buildings used for cattle accommodation and storage (retrospective) • Extension to existing cattle accommodation buildings • Slurry lagoon • Silage clamp (retrospective) • New silage clamp 	
b	Location of development	
	Land at Trevern Farm, Velindre Farchog, Crymych, Pembrokeshire	
c	Characteristics of the potential impact	
	<p>7 x SSSIs 6 x SACs 6 x SAMs 5 LBs</p> <p>The proposed developments at this site fall in my opinion, within the description at 1(c) of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (as amended) ("the 1999 Regulations") as an <i>Intensive Livestock Installation</i>. The area of the development exceeds 500 square metres, which is the applicable threshold in Column 2 of Schedule 2 of the 1999 Regulations.</p> <p>In considering this case I have had regard to the selection criteria in Schedule 3 of the 1999 Regulations, the general advice contained in Office Circular 11/99:Environmental Impact Assessment ("Circular 11/99").</p> <p>In reaching my recommendation I have noted and accepted the advice of NRW who have indicated that the development is likely to have an impact on lichens in the Ty Canol Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR) due to emissions, and also the impact on several SSSIs (some of which are part of a SAC) as a result of slurry spreading associated with the proposed development. This has led to my</p>	

		<p>conclusion that the development triggers the requirement for EIA for these reasons. I have also noted and accepted the advice of Cadw who stated that the development is likely to have a significant impact on the setting of a number of nationally important historic assets to trigger the requirement for EIA.</p> <p>It is therefore my recommendation that we direct that EIA is required due to:</p> <ul style="list-style-type: none"> • the likely significant impact on SSSIs and SACs referred to in the advice of NRW • the likely significant impact on the settings of Scheduled Ancient Monuments referred to in the advice of Cadw • the likely significant impact on the settings of listed buildings referred to in the advice of Cadw 	
(ii)	If a SO/SD has been provided do you agree with it?	Yes	No
(iii)	Is EIA required?	Yes	No

Assessment	Recommended Action	
Schedule 1 development	8A. Issue direction stating EIA Required	✓
Schedule 1 development – appeal is at an advanced stage (PINS ONLY)	8B. Issue direction stating EIA Required	
Schedule 2 development – threshold exceeded/ criterion met or Sensitive Area and likely to have significant effects	8C. Issue direction stating EIA Required	✓
Schedule 2 development – appeal is at an advanced stage - threshold exceeded/ criterion met or Sensitive Area and likely to have significant effects (PINS ONLY)	8D. Issue direction stating EIA Required	
Schedule 2 development – not likely to have significant effects on the environment	8E. Issue direction stating EIA Not Required	
Schedule 2 development – appeal is at an advanced stage - not likely to have significant effects on the environment (PINS ONLY)	8F. Issue direction stating EIA Not Required	
Schedule 2 development but effects not clear at this stage – file to be reviewed at a later stage	8G. No action – review when appropriate i.e. on receipt of new information/case progress	
Schedule 2 development – negative (i.e. EIA not required) LPA screening/Welsh Ministers screening direction issued – PINS agrees (PINS ONLY)	8H. EIA Not Required	
Schedule 2 development but not EIA development – negative screening opinion – Welsh Ministers agree	8I. EIA Not Required	
Schedule 2 development but not EIA development – positive screening opinion – Welsh Ministers disagree	8J. EIA Not Required	
Schedule 2 development – positive (i.e. EIA not required) LPA screening/Welsh Ministers screening direction issued – PINS disagrees (PINS ONLY)	8K. EIA Not Required	
Project does not fall within the EIA Regulations as either: (a) it is listed within the descriptions of development Column 1 of Schedule 2 of the EIA Regs but does not meet relevant threshold/criterion; or (b) it does not fall within the categories of development in Column 1 of Schedule 2 of the EIA Regs.	8L. EIA Not Required - Issue direction stating either: (A) project listed within descriptions of development in Column 1 of Schedule 2 of the EIA Regs but does not meet relevant threshold/criterion; or OR (B) project does not fall within the categories of development in Column 1 of Schedule 2 of the EIA Regs.	

Name and Job Title of Assessor	Ceri Litherland – Decisions Officer, Decisions Branch, Planning Directorate
Date of Assessment	15 January 2016

9A Sign-off	
Name and Job Title of Countersigning Officer	Marged Wyatt, Planning Manager, Decisions Branch, Planning Directorate
Comments of Countersigning Officer ¹	I agree with the conclusions reached above and the recommendation that EIA is required for the reasons given.
Signature	<i>Margd L Wyatt.</i>
Date	18 January 2016

¹ Comments should reflect whether conclusions/ recommended action of assessor are agreed with.

To: Nick Iles
Decisions Branch
Planning Directorate

Your ref: qA1233224

From: Helen May
Cadw
01443 336098

Date: 9 December 2015

Planning application for cattle accommodation buildings, slurry lagoon, silage clamps and open yard areas (part retrospective) at land at Trewern Farm, Velindre Farchog, Crymych, Pembrokeshire

Thank you for your minute of 17 November 2015 asking for our comments on the likely impact of the above mentioned development on the environment and whether or not an Environmental Impact Assessment (EIA) is required.

By way of background, we have previously been consulted by Pembrokeshire Coast National Park Authority on the planning application and been asked to provide a scoping opinion. I attached a copy of our replies.

We have now assessed the characteristics of this proposed development and its location within the historic environment, in particular, the likely impact on designated or registered historic assets of national importance including scheduled monuments, listed buildings, registered historic parks, gardens and landscapes.

The farm complex has increased in size since 2000, when Ordnance Survey maps indicate that the farm building and yards covered an area of circa 0.54ha. In 2009 the Ordnance Survey map shows building and yards covering some 0.73ha. This current application covers an area of 3.3ha with most of the structures already constructed. This is a significant increase in size, with buildings up to 10m high, resulting in a development that has become a notable feature within the landscape.

Our records show that the following historic assets are potentially affected by the proposal:

Listed Buildings –

Grade II* - Trewern (12808).

Grade II - Privy at Trewern (12809), Stable Block at Trewern (12810), Outbuildings by pond west of Trewern (12811), Pentre Evan Farmhouse and Outbuilding (12800) and the Former Barn at Pentre Evan Farm (12801).

Scheduled Monuments

Pentre Ifan(PE008), Carn Ingli Camp(PE011), Carn Ingli Round Barrows(PE019), Enclosure in Ty Canol Wood(PE481) and Pentre Ifn Standing Stone(PE501).

Registered Historic Landscape

HLW (D) 7 – Preseli

Our Senior Archaeological Planning Officer has provided the following advice:

The complex of listed buildings at Trewern is located within 200m of the development. The main frontage of the grade II* Trewern farmhouse faces towards the development and is therefore likely to have a significant impact on its setting. A similar impact is likely to be expected on the associated grade II listed buildings at Trewern.

The former barn at Pentre Evan is located some 350m southeast from the proposed development. Its frontage faces north and therefore whilst the proposed development is likely to be detrimental to its setting, the impact is not likely to be significant impact.

The farm complex is clearly visible in identified significant views from the scheduled monuments known as Pentre Ifan (1.4km to the southeast of the application area), Carn Ingli Camp (2.4km to the southwest of the application area) and Pentre Ifn Standing Stone (1.53km to the southeast of the application area). The complex is also clearly visible in views from the scheduled monuments known as Carn Ingli Round Barrows (2.28km to the west of the application area) and the Enclosure in Ty Canol Wood (1.43km to the south of the application area).

The application buildings have added a modern large industrial sized complex into a rural landscape and into identified significant views from the scheduled monuments known as Pentre Ifan, Carn Ingli Camp and Pentre Ifn Standing Stone. There is likely to be a significant impact on the setting of these scheduled monuments.

The application site is located outside the registered Preseli Landscape of Outstanding Historic Interest. While the application buildings have added a modern large industrial sized complex into a rural landscape, there is likely to be a limited impact on the overall registered historic landscape.

Conclusion

The proposed development is likely to have a significant impact on the settings of the scheduled monuments known as Pentre Ifan, Carn Ingli Camp and Pentre Ifn Standing Stone and also on the setting of the grade II* listed building Trewern and its associated listed buildings (i.e. the Privy, stable block and the outbuildings by Pond west).

The supporting statement/ policy appraisal submitted with the planning application discusses the historic environment and cultural heritage from paragraph 41 onwards. This appraisal suggests that a landscaping scheme, which could be conditioned as part of any permission, has the potential to significantly improve the setting of the listed buildings at Trewern by screening the permitted and proposed farm buildings. We agree that appropriate landscaping, secured by way of a condition attached to any planning permission, may provide a means to mitigate the impact of the proposed development on the historic assets discussed above but this option has not been fully analysed by the applicant.

On balance, we consider that the development is likely to have a significant impact on the setting of a number of nationally important historic assets to trigger the requirement for an EIA. If, however, you determine that an EIA is not required the applicant should in any

case produce a detailed assessment by an accredited expert analysing the full impact of the development on the setting of the aforementioned historic assets, along with any proposed mitigation that may be considered necessary to alleviate the significance of the impact.

Helen May
Casework Team Leader



**Cyfoeth
Naturiol
Cymru**
**Natural
Resources
Wales**

Mr. Nick Iles,
Welsh Government
Crown Building
Cathays Park
Cardiff
CF10 3NQ

Our ref: CAS-10264-W6S1 &
SH/2015/118849
Your ref: Qa1233224
Date: 14 December 2015

Annwyl/Dear Mr. Iles

**Re; Town and County Planning Act 1990.
Town and Country Planning (Environmental Impact Assessment) (England and
Wales) Regulations 1999 as amended.
Trewern Farm, Crymych, Pembrokeshire.
Cattle accommodation buildings, slurry Lagoon, silage clamps and open yard.**

We refer to your letter dated 17 November 2015 regarding the above site and the request for our comments in respect of the proposed developments.

We do have a number of concerns in relation to this proposed development which in fact we are verbally advised may have already started construction on site. There are potential impacts from the sheds and slurry pit themselves, and also from the slurry spreading patterns, which are integral to the development.

Possible impacts from sheds, heaps of solid material, silage clamp and slurry store.

It is likely that there are emissions of ammonia to the atmosphere which could impact upon lichens, which are qualifying features of at Ty Canol Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR). It is possible that effects could be mitigated by tree-planting around the site, but an assessment will be required to show both the effects and the required mitigation methods. Air quality monitoring is carried out at Ty Canol Natural Nature Reserve (NNR), so data could possibly be made available to inform such an assessment.

Possible impacts of slurry spreading.

Natural Resources Wales/Cyfoeth Naturiol Cymru
Maes Newydd, Llandarcy, Neath Port Talbot, SA10 6JQ.
Llinell gwasanaethau cwsmeriaid/Customer services line: 0300 065 3000
www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk
Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

There are several SSSIs with sensitive features adjacent or close to areas covered by slurry spreading agreements, or in the farm's ownership. These are:-

- Gallt Llannerch – Coed Gelli-deg SSSI (lichens are qualifying features), part of North Pembrokeshire Woodlands Special Area of Conservation (SAC)
- Allt Pontfaen – Coed Gelli-fawr SSSI (lichens are qualifying features), part of North Pembrokeshire Woodlands SAC
- Ty Canol SSSI / NNR (lichens are qualifying features), part of North Pembrokeshire Woodlands SAC
- Carn Ingli SSSI (sensitive to nutrient inputs)
- Mynydd Preseli SSSI & SAC (sensitive to nutrient inputs)

There are also two important bat sites with key foraging areas that could be affected by the spreading:-

- Pengelli Forest and Pant-teg Wood SSSI, part of North Pembrokeshire Woodlands SAC (barbastelle bat feature)
- Felin Llwyngwair SSSI, part of Pembrokeshire Bat Sites and Bosherton Lakes SAC (greater horseshoe bat feature)

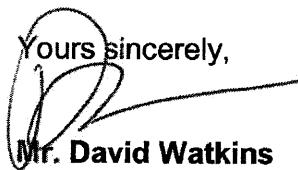
The barbastelle is a moth specialist that forages over diverse grassland, and the greater horseshoe feeds on large insects such as chafers and moths over grassland. Any agricultural improvement of grassland around these sites by application of slurry could affect the availability of insect prey. Past bat surveys have shown that barbastelles were feeding over grassland to the west of Pengelli Forest, in particular. Both species can travel up to 16km in a single night to forage, but they have 'key sustenance zones' that are closer to the roosts and are particularly important.

We welcome the statement that slurry spreading can be avoided on sites adjacent to SSSIs, so it is essential that we see a copy of the Manure Management Plan to assess the detail. Similarly, we are pleased that slurry injection is undertaken, but is this the only means of slurry application all year round? This question needs clarification.

In our opinion we think that the planning application(s) should be subject to a Habitats Regulations Assessment, for possible impacts on the North Pembrokeshire Woodlands SAC (oak woodland feature and barbastelle bat feature) and Pembrokeshire Bat Sites and Bosherton Lakes SAC (greater horseshoe bat feature).

The question of whether an EIA is required is naturally one for your selves but there does appear to be potential for environmental consequences associated with the current proposed development/possibly partially constructed development which may need careful consideration and assessment.

Yours sincerely,



Mr. David Watkins
Senior Development Planning Advisor

Direct dial 0300 065 3327



Alex Lawrence
Reading Agricultural Consultants
Beechwood Court
Long Toll
Woodcote
Reading RG8 0RR

By email to: Alex.Lawrence@readingagricultural.co.uk

Ein Cyf/Our Ref: qA1233343
Eich Cyf/Your ref: 6818WAG1
Dyddiad/Date: 20 January 2016

Dear Sir

TOWN AND COUNTRY PLANNING ACT 1990
TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
(ENGLAND AND WALES) REGULATIONS 1999 (AS AMENDED)
PROPOSED 0.5MW ANAEROBIC DIGESTION PLANT AT TREWERN FARM, FELINDRE
FARCHOG, CRYMYCH, PEMBROKESHIRE

1. I refer to your request received on 11 November 2015, made pursuant to regulation 5(6) of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 ("the 1999 Regulations") for the Welsh Ministers to make a screening direction as to whether or not the development your clients propose is 'EIA development' within the meaning of the 1999 Regulations and whether an environmental statement is required.
2. I am authorised by the Minister for Natural Resources to consider and make the screening direction.
3. The development proposed, namely "*Proposed 0.5MW Anaerobic Digestion Plant*", falls within the description at paragraph 11(b) of Schedule 2 to the 1999 Regulations. Since the proposal exceeds the threshold in column 2 of the table in Schedule 2 to the 1999 Regulations, I consider your proposal to be "Schedule 2 development" within the meaning of the 1999 Regulations.
4. The views of Cadw and Natural Resources Wales (NRW) were sought and their advice is attached at Annexes A and B to the EIA checklist (also attached), which identifies the key areas which the Welsh Ministers considered when reaching their conclusion.