SUPPORTING PLANNING STATEMENT

FOR

SLURRY STORE AND SEPARATOR TO COMPLY WITH THE WATER RESOURCES (CONTROL OF AGRICULTURAL POLLUTION) (WALES) REGULATIONS 2021

Prepared on behalf of

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1. INTRODUCTION

1.1. This report has been prepared by Rostons following instructions from Mr Andrew Jones of Borras Head Farm, Wrexham.

1.2. I, Sarah Gerrard, am a Graduate Surveyor and work for the firm Rostons Limited. I am a probationer member of the Central Association of Agricultural Valuers. I have a degree in Rural Enterprise and Land Management from Harper Adams University.

I understand my duties in the preparation of this report and have complied with that duty. The substance of the instruction I have received and the information I have been provided with are set out within this report and its appendices.

Purpose of Report

1.3. The purpose of this report is to fully justify the planning application for a slurry store and separator at Borras Head Farm, Borras Road, Borras, Wrexham, LL13 9TH.

1.4. This report will demonstrate the necessity of the development for the business to comply with The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021.

The Farm

1.5. Borras Head Farm is a dairy farm, comprising agricultural land and buildings. The farm partnership comprises of the applicant, Mr Andrew Jones and his father Mr Jones senior. The applicant works full time on the farm with his son Harry who has worked on the farm full time since completing agricultural college in 2023.

1.6. The agricultural enterprise totals approximately 650 acres, with 400 acres being owned by the farm partnership and an additional 250 acres nearby are rented. The land is used for the dairy herd grazing and forage production.

1.7. The dairy herd are housed in cubicles and fed under cover. The farm is looking to expand the milking herd to 220 cows.

1.8. The current herd produce on average approximate 7,000 litres annual milk yield.

2. PROPOSED SITE AND SURROUNDING AREA

Site Situation

2.1. Borras Head Farm is accessed from Borras Road and is approximately 2km from Wrexham city centre and is in the authority of Wrexham County Borough Council. The site is surrounded by agricultural land. Residential properties are sporadically sited throughout the landscape.

2.2. The store will be located as close as possible to existing infrastructure, whilst allowing for easy access from the farm's existing accesses and gateways. It will be sited adjacent to the existing farming complex consisting of large agricultural buildings and therefore will not stand out, being contiguous with the existing agricultural use of the property. The location of the proposed development is further shown in Appendix 1.

2.3. As can be shown in Appendix 2, the wider farmed area is shown edged blue with green cross hatching. This shows the extent of land farmed by the partnership.

3. PROPOSED DEVELOPMENT

Context

3.1. Under the CoAPR, total nutrient containment is required throughout the 5-month winter period. The on-farm infrastructure does not currently meet these legal requirements.

3.2. The proposed slurry storage will provide the regulatory required storage capacity, in addition to reducing transport, spreading frequency, labour costs and ammonia emissions of the slurry produced on the holding

3.3. The proposed store will enable greater control of application to maximise the efficient use of the stored nutrients on the land.

3.4. The cost of spreading less frequently will reduce the cost to the farm business, improving the business's viability.

Design

3.5. The new slurry store will provide the holding with storage for 5 months winter storage capacity, in compliance with The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021.

3.6. The scale of the proposal sits comfortably within the surrounding agricultural environment. The proposed lagoon is of typical character for agricultural nutrient storage facilities throughout the country.

3.7. The slurry store will be 4.86m high and 25.735m in diameter. It will be juniper green in colour and constructed of metal wall panels.

3.8. The design is compatible with the development benefiting the business and environment.

3.9. Livestock is housed on straw and therefore a separator is required to enable efficient separation of the solid matter from the liquid which can then be correctly stored and spread.

Farming Connect – Infrastructure Report

3.10. The applicant is seeking to enhance the sustainability of the farming business and future proof the business for the next generation. As part of this, an Infrastructure Report was commissioned through Farming Connect.

3.11. Within this report, the following storage requirement was calculated:

Slurry Production per month	**Volume of slurry per month (m^3)**
220 dairy cows producing 53 litres of slurry/cow/day for 30 days.	350 m^3
Parlour washings intercepted and diverted to separation tank.	0 m^3
Remaining youngstock loose housed on straw and producing FYM only.	0 m^3
Open yard linking cubicle/feed buildings to parlour @ 240m^2 collecting 83mm surface rainfall each month.	20 m^3
Open scrape yards linked to ramped push in point @ 152m^2 collecting 83mm surface rainfall each month.	13 m^3
Pre 91 silage clamps linked to separation tank and stored in isolation as lightly fouled contaminated runoff.	0 m^3
Post 91 silage clamp to be connected to separation tank and stored in isolation as lightly fouled contaminated runoff.	0 m^3
Total current monthly production of slurry/dirty water currently entering the slurry store.	**383 m^3**

3.12. As can be seen from the figures above, five month storage would require 421,241 gallons capacity storage to comply with the CoAPR 5-month storage requirement.

3.13. The proposed capacity and nutrient production at the farm have been calculated based on regulatory requirements. The store will be designed to comply fully with BS5502 and to comply with the CoAPR.

3.14. Natural Resources Wales (NRW) will be informed of construction works at least 14 days prior to commencement of construction.

3.15. Once the new slurry store is completed, the holding will have adequate capacity to meet The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021.

3.16. The development will reduce nutrient run-off and increase efficiency of nutrient management on the holding via the nutrients in slurry.

3.17. Currently there is limited slurry capacity on the farm. The new infrastructure will enable spreading to be controlled to times when there is low risk of runoff and when there is growing crop which will be able to utilise the nutrients applied in the slurry. There will be reduced need to spread slurry when there is a high risk of surface runoff or when the soils are wet.

3.18. Increased slurry storage capacity reduces the risk of applying slurry to land during unfavourable weather conditions i.e. to wet and frozen soils and when there is high risk of surface water flow.

3.19. Applying slurry to land only when the land is suitable reduces the soluble phosphorus.

3.20. The frequency of slurry spreading will be reduced due to increased storage capacity.

3.21. A reduction in slurry spreading and field operations during times when the land is not suitable will reduce soil compaction, this subsequently reduces the likelihood of run-off.

Location

3.22. The proposed site of the new slurry store has been chosen as it is adjacent to the current yard and does not spread development. It would no impact on the surrounding landscape.

3.23. The location has been chosen due to being the most appropriate given the context of the yard and farming operations.

3.24. Access points to the site will remain unchanged

3.25. The development will have no impact on the existing hedge boundaries to the fields. These will be maintained and provide natural screening of the lagoon. The lagoon is over 400m away from the nearest watercourses or ditch.

3.26. Additional storage will allow the nutrients within the slurry to be used more efficiently and reduce the need for inorganic fertilisers, reducing greenhouse gas emissions and the potential leaching of nutrients to surface water.

3.27. The proposed slurry store will not stand out in the surrounding landscape as it will be located adjacent to the existing farming complex, therefore not adversely affecting the surrounding area.

3.28. The new slurry store is essential for the continuation of the farm business and viability of the enterprise moving forwards. The slurry store is required to meet legislative requirements.

4. THE POLICY CONTEXT

4.1. This section contains and describes the relevant planning policies commencing first with National Planning Policy Framework, before focussing on local planning policy. The following section then describes the material considerations that are relevant to this application.

4.2. The most recent legislation is in the form of Planning Policy Wales which sets out the Welsh Government's land use planning policies. This is supplemented by a series of Technical Advice Notes (TANs).

4.3. At the heart of the PPW is a 'presumption in favour of sustainable development' which should be seen as a golden thread running through both plan-making and decision-taking. The Local Planning Authority must therefore have regard to the economic, social and environmental effects of any proposed development.

National Planning Policy – TAN6

4.4. The Policy Framework relating to agricultural buildings is contained within TAN 6 'Planning for Sustainable Rural Communities'. Under 6.6.4:

> *"Regulations set minimum standards for new, substantially reconstructed or enlarged silage, slurry or fuel oil facilities. The Environment Agency is empowered to serve notice requiring action to improve existing installations when it considers that there is a significant risk of pollution. These Regulations form an important part of the Assembly's commitment to reduce agricultural pollution of rivers. Planning authorities are therefore encouraged to consider sympathetically development proposals aimed at meeting the requirements of these Regulations."*

4.5. The proposed development at Borras Head Farm would be consistent with this policy as the improvement to the on-farm infrastructure will mitigate the pollution risk and ensure compliance with CoAPR. This will prevent run-off into watercourses, safeguarding water quality and ecosystems.

4.6. The slurry store will enable better nutrient management to improve soil quality and reduce the need for inorganic fertilisers. The new store will meet all current legislative requirements set out in the CoAPR 2021.

Local Planning Policy – Wrexham Unitary Development Plan

Policy EC13 – Surface Water Run-Off

4.7. The proposed new slurry store will align with this policy by enabling the effective containment of slurry during the closed period. This will mitigate the need to spread when there is risk of surface water run-off, preventing potential contamination of local watercourses. This ensures environmental protection, safeguarding water quality and supporting sustainable agricultural practices to.

Policy EC3 – Agricultural Buildings

4.8. New agricultural buildings are permitted unless the development has a detrimental impact on the environment or surrounding landscape. The proposed development at Borras Head Farm forms part of the existing farm complex.

Policy EC4 – Hedgerows, Trees and Woodland

4.9. The development will not have an impact on any hedgerows or trees on the site.

EC6 – Biodiversity Conservation

4.10. The new slurry store will not disrupt natural habitats, the proposed site is currently used by the intensive agricultural operations and therefore no negative impact on habits, shelter or resources for wildlife are anticipated. Careful management and storage of slurry will mitigate potential runoff and subsequent pollution, ensuring protection of nearby ecosystems.

Policy GDP1 – Development Objectives

4.11. Under GDP1, development should make a positive contribution to the appearance of the locality and be of appropriate scale, design and layout. Development should take account of personal and community safety. In addition, make the best use of design techniques, siting and orientation to conserve energy and water resources.

4.12. The development is in accordance with GDP1 for the following reasons:

- The new slurry store will be in keeping with the existing farming operations at Borras Head Farm, the proposed development will benefit the farming business by ensuring compliance with CoAPR.
- The proposal will not affect surrounding properties or public/private spaces.
- The proposal will be sited adjacent to the existing farm complex and on an area already used part of the farming enterprise.
- The proposal will be accessed via an existing established access.

4.13. Policy GDP1 also seeks to ensure the safety and amenity of the public and safeguard the environment from adverse effects on water pollution. In particular, this development seeks to enhance the management of slurry and in turn reduce the potential of surface water run off.

4.14. The land is already used for intensive agriculture and therefore it is not anticipated that there will be any adverse ecological or biodiversity impacts.

4.15. Authorising this development would help to future proof the farm business to enable the applicant's son to continue farming.

Other Legislation

4.16. The new store will provide sufficient storage capacity to store all slurry and dirty water from 1st October – 1st March, to comply with the non-spreading period from 15th Oct – 15th Jan. Both of these are required within the CoAPR. The store provides the regulatory 5 months storage required.

4.17. The construction will be carried out in order to meet the required storage capacity of slurry storage system and will need to be in place by 1st August 2024 as required by the CoAPR.

4.18. The new slurry store will allow all slurry to be stored throughout the winter closed period and be spread to the land only when the land and weather conditions are suitable, allowing the maximum benefit to be achieved from the nutrients. Nutrients will only be applied to the land when the land requires the application.

4.19. The farm will adhere to recommendations of nutrient application, provided in the farm's nutrient management plan ensuring nitrogen application from the slurries produced is carried out in accordance with the regulations and does not exceed maximum N loading (170kg/h) unless a licenced derogation to 250kg/h is received.

4.20. Currently, the slurry is spread on a regular basis throughout the winter due to insufficient storage capacity. The slurry will be emptied at the end of the winter closed period in accordance with legislation.

The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021

4.21. The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021, herein referred to as 'CoAPR' include several provisions aimed to prevent and reduce water pollution, including ensuring storage facilities are designed and constructed to prevent leaks and the capacity of storage facilities must be sufficient to hold slurry produced during periods when land application is not possible due to weather or soil conditions.

4.22. This means that farms must have sufficient storage capacity to hold at least five months' worth of slurry production. Additional capacity may be required in areas with high rainfall or on farms with high livestock density.

4.23. The CoAPR will be enforced by Natural Resources Wales and penalties including fines can be issued for non-compliance.

4.24. The slurry should be applied to land in accordance with a suitable manure management plan (MMP) based on an underlying nutrient management plan (NMP). The Code of Good Agricultural Practice (COGAP) has standard formats for the MMP and associated NMP.

5. MATERIAL CONSIDERATIONS

Environmental Sustainability and Regulatory Compliance

5.1. In compliance with the CoAPR, the new slurry store will ensure that winter storage of all nutrients and dirty water produced by the stock can be contained. The store's adequate capacity for all dirty water during the winter and wet weather periods will reduce potential runoff, reducing ammonia emissions, odour emissions and noise pollution.

5.2. The proposed development, providing sufficient storage during the closed period will reduce vehicle movements over the winter months. This will also further reduce damage to fields and tracks, reducing the pollution risk when spreading nutrients and allowing greater control over spreading times.

5.3. Improved control of nutrients will reduce fertiliser costs improving the viability of the farm. There will also be a reduction in costs of spreading of the slurry due to reduced frequency of emptying the facility.

5.4. The cattle are bed on straw and therefore the application includes a separator to enable simplified storage and application, by removing a large proportion of the solid matter, leaving a free-flowing liquid and a stackable solid.

5.5. The new infrastructure will enable the business to sufficiently store slurry and dirty water for the required period and comply with the regulations which require at least 5 months slurry storage.

5.6. The infrastructure required to comply with the project requires significant investment for the farm business.

5.7. The applicant is keen to ensure that the business complies with environmental legislation and is looking to invest to make a sustainable business for himself, his son and future generations.

Vehicle Movements

5.8. Access to the site will be via existing entrances and gateways used by the farm workers when emptying the store. There is no public access to the site.

Enhancing Biodiversity

5.9. There will be no adverse impact on the surrounding wildlife as there is already a farmyard nearby which is used to access existing buildings by large machinery.

Community Safety

5.10. The proposed new store is located within the Borras Head Farm boundary. Public access is not permitted to the farm.

Consultants Analysis

5.10.1. The applicant has shown willingness to comply with the regulations and has engaged Farming Connect to prepare an Infrastructure Report as referred to in Section 3. A copy of this is included in Appendix 5.

6. SUMMARY AND CONCLUSIONS

6.1. Rostons have been instructed to provide a supporting statement for the slurry store and separator to comply with The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 and serve the existing farming system at Borras Head Farm. This need has been examined within the context of national and local planning policy guidance on the sustainability of agriculture and the rural economy.

6.2. National policy guidance clearly identifies how the agricultural industry is undergoing considerable change.

6.3. Local planning authorities are urged to take into account the need for farm businesses to adapt to the change in market conditions, and the need to maintain an efficient flexible agricultural industry to support future generations.

6.4. The applicant is the owner-occupier of the land on which the application stands at Borras Head Farm. Since taking over the management of the farm, the applicant is committed to improving the business sustainability and viability.

6.5. The proposed slurry store and separator is essential for the farming business to continue to run successfully at Borras Head Farm and comply with The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021

APPENDIX 1

Location Plan

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Location Plan

Land App



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CP15353

50 m
Scale 1:2500 (at A4)

N

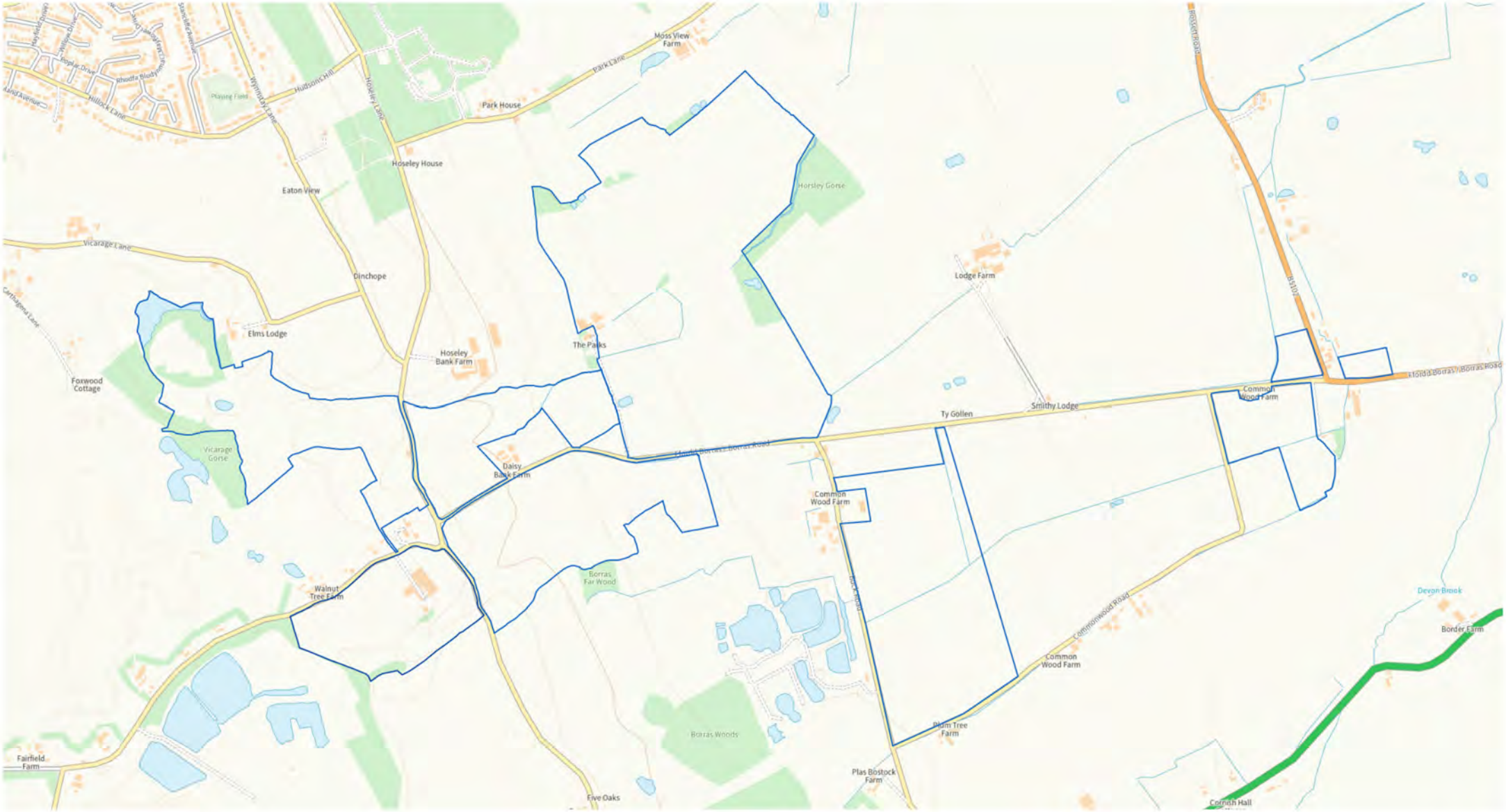
APPENDIX 2

Farm Plan

Rostons
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Plan of Land

Land App



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CP15353

500 m
Scale 1:15000 (at A4)

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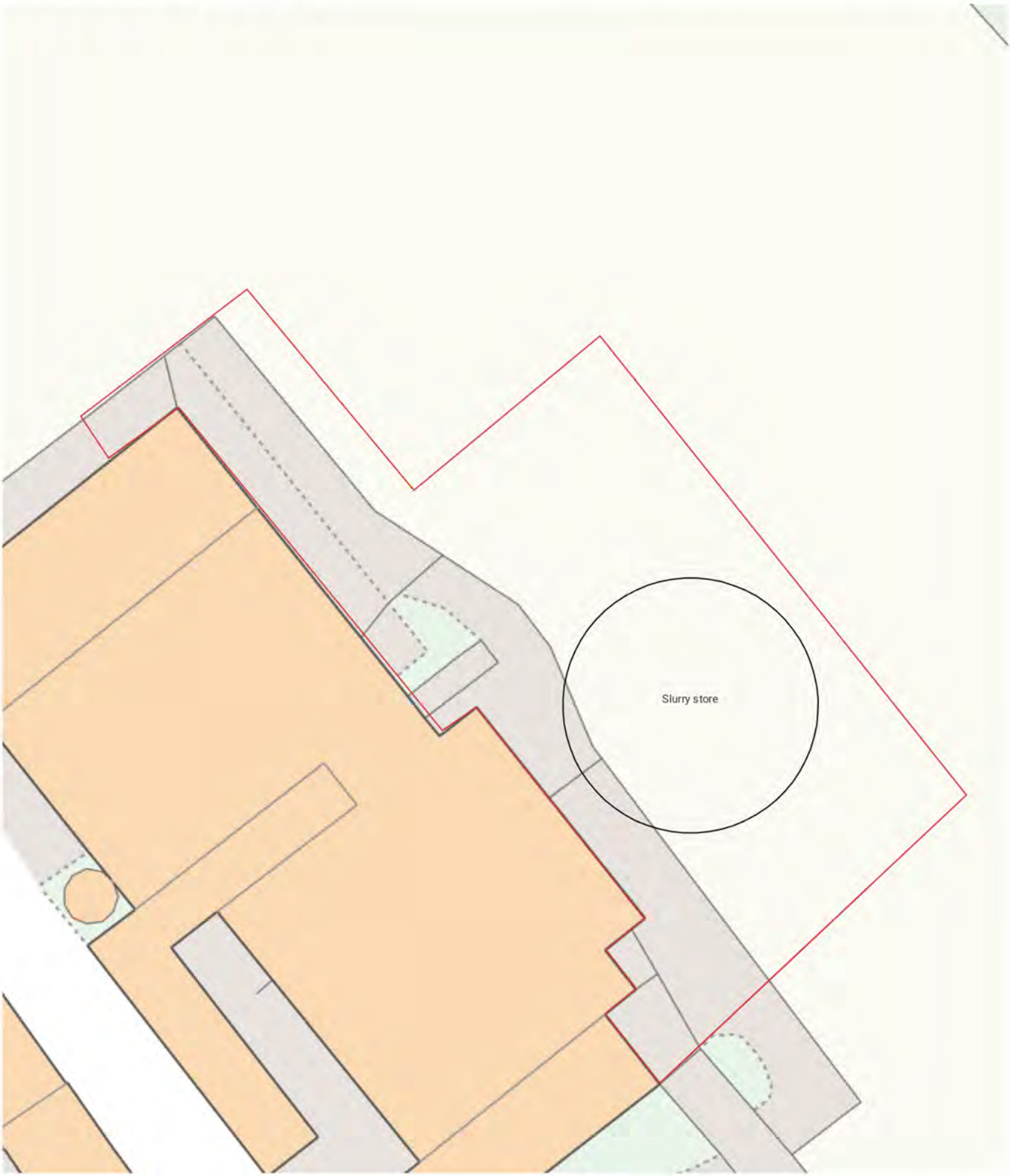
APPENDIX 3

Site Plan

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Site Plan

Land App



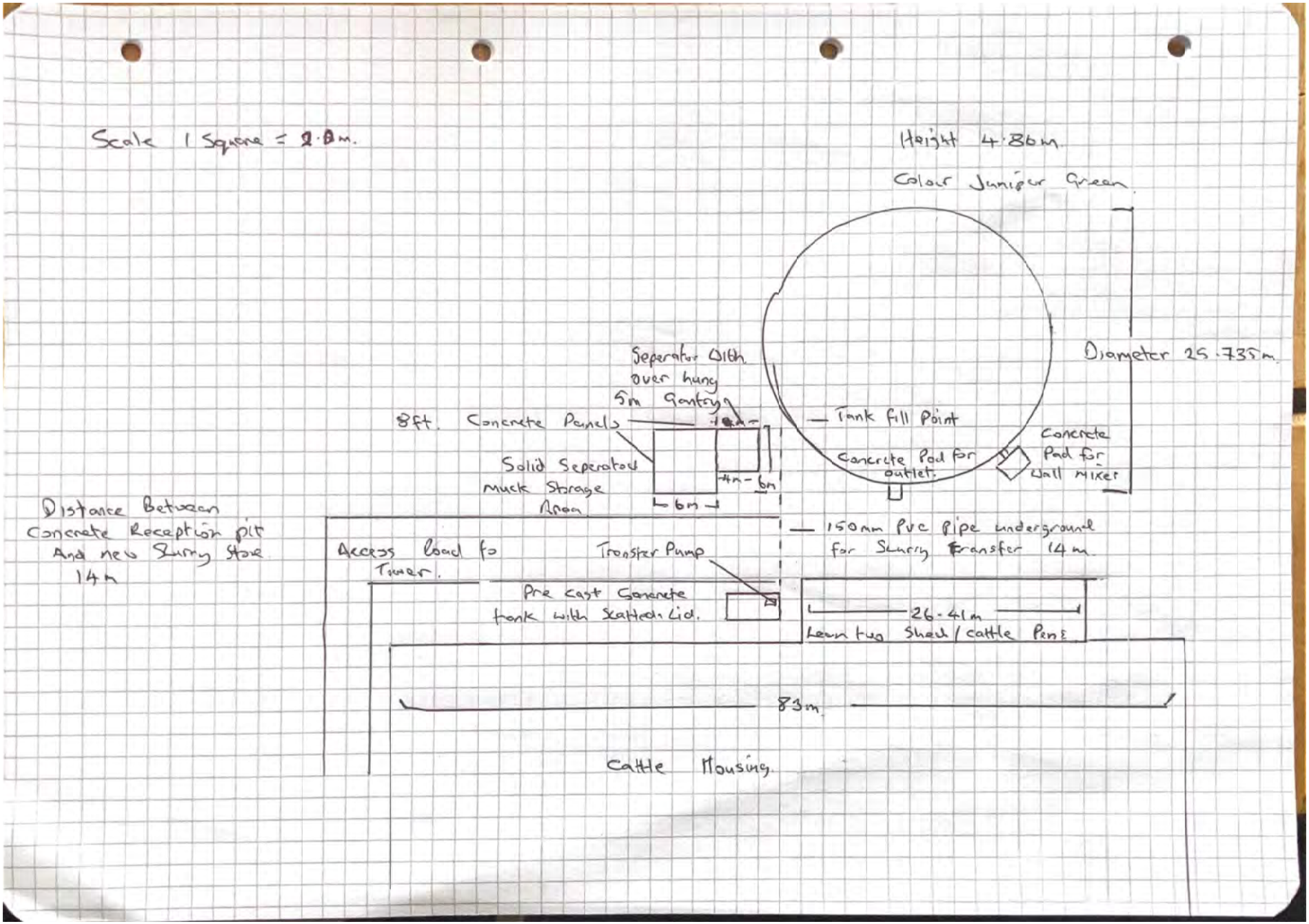
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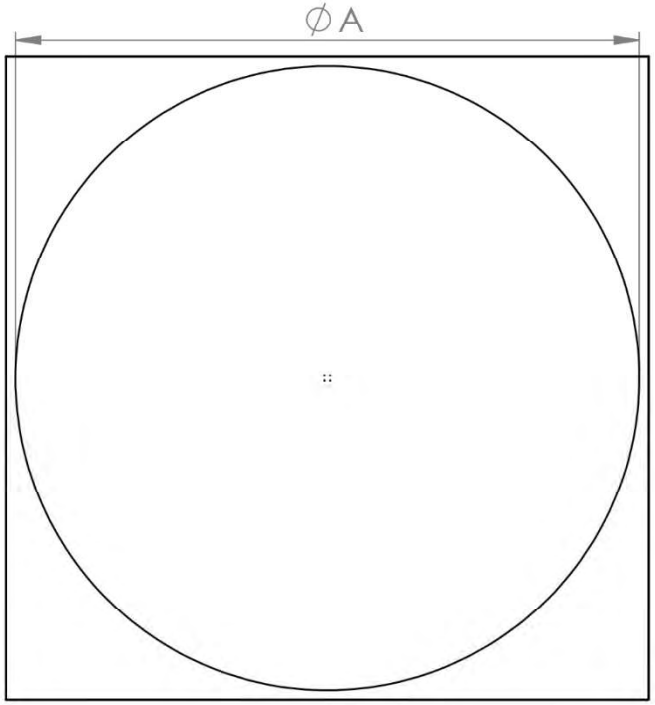
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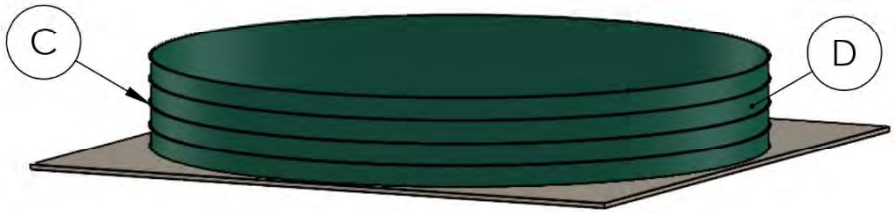


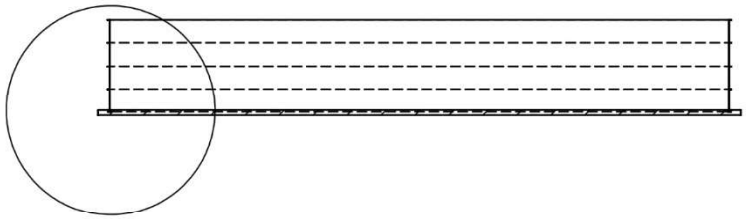
APPENDIX 4

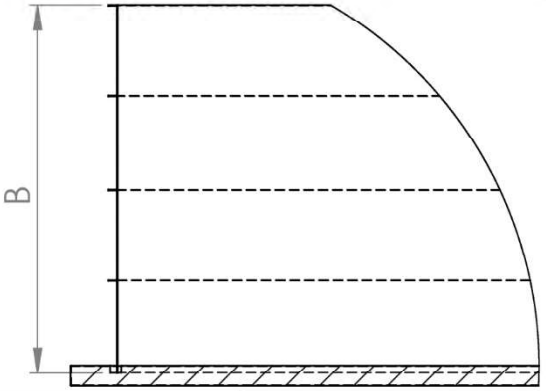
Elevation Drawings



Drawing Number Reference – Q8667B – Andrew Jones		
Item No.	Process	Description
A	Tank Diameter	25.735m
B	Tank Height	4.86m
C	Qty Of Sheets Per Ring	33
D	Colour	Juniper Green







ENGINEER DECLARATION			
Name:	Pareshkumar Shah	**Professional Body Membership**	
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Compliant With 2010 (SSAFO) And BS5502 Part 50 Regulations.

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DRAWN	LB	DATE	19/02/2021
APPV'D	AJ	DATE	19/02/2021
DATE DRAWING PRINTED		18/05/2023	

THIRD ANGLE PROJECTION

SCALE: NTS

SALES REF: TANK-INFO

TITLE:

4 Ring Tank Without Cover- Planning Information Drawing

APPENDIX 5

Infrastructure Report

Due to file size restrictions, a copy of this has been uploaded alongside the planning application separately.