
SUPPORTING, DESIGN AND ACCESS STATEMENT

AGRICULTURAL LIVESTOCK BUILDING

To support the Dairy Enterprise At

Torriad Farm,
Cobham Farm Lane
Bowling Bank,
Wrexham
LL13 9RT

ON BEHALF OF

Trading As Torriad Farms Ltd

MARCH 2024



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1. BACKGROUND

Torriad Farm was purchased by [redacted] trading as Torriad Farm Ltd in 2021 and extends to approximately 121 hectares of land and buildings (68 hectares owned and 53 hectares rented). The business also runs a herd of 300 dairy cows and 114 youngstock. The farm is registered with the Welsh Government as a Rural Payments Wales Single Payment Claimant and is entered into both Glastir Entry and Glastir Advanced Agri Environment Schemes.

The site is farmed as part of a larger holding, Hoseley farm, which in total farm 3000 acres across three principal holdings with operations extending to poultry, arable, heifer rearing unit and dairy enterprise run at Torriad Farm. The subject site is an established and successful dairy enterprise with a focus upon genetics of the stock on farm and reducing costs of production to develop a sustainable business.

The holding at Bowling Bank is as shown below and comprises a range of farm buildings.



Limited development has taken place since 2014, therefore, as part of continuous growth and agricultural operations at the working farm, the applicants require the subject building to provide strategic, essential and reasonably necessary livestock housing (heifer rearing facilities) which will adjoin the main yard and established yard complex.

The ability to house the heifer replacements at site can ensure efficient “in house” management and save the farm money long term and prevent the farm becoming over stocked from a welfare point of view as the animal age.

The farm requires the subject livestock accommodation to allow for the applicants to house all their heifer on site, which at present are currently housed off site at another farm. Therefore, the building is to replace housing paid for off site and will not be available for the winter 2024-2025.



Furthermore, in line with current stocking rate at the site, the subject building will ensure the site is not over stocked and not risk or compromise animal welfare. The ability to housing the heifers on site (which are herd replacements) will allow the farm to adhere to terms of current milk contracts, farm assurances and the dairy industry stringent welfare standards. Notwithstanding from an ethical, welfare and economic point of view the growth and future of the current herd is dependent on the management of these animals therefore the subject building is to supports the growth and subject investment the applicant wishes to implement at the site

Torriad Farms Limited is a long established and successful farming enterprise undertaken between three site, 300 acres and in conjunction with the subject site and all additional parcels of land forming the partnership of Mr and Mrs Andrew Jones

The farm employees 7 members of staff on a full time and 2 part time/ relief milking and tractor driver. Milk production is the key driver of the enterprise and is undertaken all year round twice daily and spring calved. All livestock is intensively reared; Weaned; Calved; Replaced; Grazed and Corn Feed accordingly. Batch rearing systems are implemented for calving and rotation of the herd to ensure welfare, production, and critical farm management.

However, the applicants to date have had to supplement their rearing program through the means of locally sourced additional livestock accommodation for heifer rearing throughout winter at three different holdings which can pressure current practice notwithstanding be affected by stringent TB and cattle movement restrictions.

As confirmed by the farm's agricultural consultant (Kite Consulting), there is a need to house an additional 200 heifers which are housed on another farm which is being sold therefore if the stock is to be brought back to Torriad, the farm quickly would be over socked and a have a major welfare issue.

Similarly, as confirmed by the applicant's veterinary surgeon (Sandstone Vet Group) the existing facilities are dated, the third-party acquisitions are taking away crucial land and buildings farmed therefore this is putting significant pressure on the applicants to ensure they maintain the health and welfare of the stock and farm

In terms of the stock to be housed, that is presently housed off site:

DRY COWS

A dry cow refers to a dairy cow that is in a stage of their lactation cycle where milk production ceases prior to calving. This part of their lactation cycle is referred to as the cow's dry period and typically last between 40 and 65 days. At present the unit has 60

The dry period is an important resting period for the dairy cow, where fresh udder tissue is formed in readiness for the lactation, and it provides an important opportunity to rid the udder of many potential pathogens that can cause mastitis.

As the cow dries up, changes begin to occur in the mammary secretions that can kill bacteria (known as lactoferrin and alpha-lactoglobulin), in addition to increases in antibody levels, which are able to kill existing infections. In some cases, particularly with *Staphylococcus aureus* and *Streptococcus uberis* infections, much better clinical cure results are achieved when antibiotic treatment occurs at drying-off rather than during lactation.



Management of the cow during the dry period must not be neglected as new infections of *E. coli* and *Streptococcus uberis* in particular can occur during this period and not become apparent as clinical mastitis until later in the lactation.

Hygiene during the dry period and pre-calving is especially important in controlling new mastitis infections. Clean bedding or field conditions are paramount. Good nutritional management will help to maintain health and immunity levels; dry cow management of housing, grazing, and nutrition should be at least as good as the management of the milking herd.

HEIFER REPLACEMENT / REARING

Heifers are the lifeblood of a herd and a valuable source of new genetics. A maiden heifer requires significant investment whether she is bred and reared on the farm or purchased. The applicants have 200 head.

Heifer selection can start before the calf is born, as choosing the right parents is vital to ensure new females fit the production system and meet performance targets. For the farm being a closed herd, the advantages of home bred replacements are as follows:

- Good knowledge of breeding history and health
- No risk to herd health
- Resistance to certain infections
- Herd health control

Monitoring heifers closely around calving is important, as lengthy and difficult calving's will reduce subsequent fertility and increase the calving interval beyond the ideal 365 days. Young cows need careful management, even after they have calved for the first and second time, to ensure they have adequate nutrition to meet their greater nutrient demand for growth, as well as maintenance and milk production.

Studies have indicated that the average cost of herd replacement on UK dairy farms is currently around 2.6ppl. It should be possible for most farm businesses to introduce strategies to reduce this cost by a significant amount, while still finding the means to produce well-grown heifers that are able to calve at 2 years of age and 90% of mature body weight for a maximum return on their investment.

For herds rearing their own replacements, the heifer rearing enterprise can tie up a significant number of resources and as a consequence reduce the size of the breeding herd. Two factors which have a big impact on the number of heifer replacements required are cow longevity and age at first calving.

Raising healthy replacement heifers takes time, commitment, skill and knowledge. Today's dairy economy has put a great deal of pressure on the cost of raising heifers. Since replacement heifers produce no daily income until they hit the milking string, viewing heifers purely as cost instead of an investment can set up your dairy for disappointment. The future of your dairy's profitability lies in the care of whoever has fed, doctored and worked with these females.

The ability to have the proposed infrastructure assists with the farms:

CLOSED HERD STATUS



The closed herd is held under a high health status – Closed herd. All replacements are reared on site. No stock is purchased. Biosecurity management should therefore be part of a comprehensive health management plan for any dairy herd, which should also include surveillance, resilience and vaccination, and control of disease spread within the herd.

When biosecurity is included within a comprehensive disease management program, infectious disease can be effectively and efficiently controlled in any dairy herd. Disease is not an inevitable consequence of modern dairying, however diseased animals perform sub-optimally and decrease on-farm efficiency and profitability through waste feed, labour and veterinary costs.

Herd health programmes employ a combination of biosecurity, vaccination and diagnostics to determine the health status of a herd. The health profile of a dairy herd will determine its success in terms of milk production, reproductive status and growth rates, i.e. the key aspects in a successful dairying operation.

Biosecurity practices are now becoming substantial components of modern farming and as all herds are impacted by infectious disease, all are likely to benefit from the preparation and implementation of a biosecurity/ herd health plan

The simplest way to keep an eye on your herd health status is to check your stock regularly for clinical signs of disease and to use your local vet to diagnose problems at an early stage. Once you have decided to implement a control programme through a herd health plan you need to check that it is working year after year.

This can entail:

- Routine herding of stock to pick up early signs of disease.
- Monitoring of records to detect changes in performance.
- Testing/treating bought-in stock and
- Use of screening tests to detect a change in herd health status.

BOVINE TUBERCULOSIS

The main farm is currently within the TB high risk area. Bovine tuberculosis (TB) is a chronic, infectious, and primarily respiratory disease that has had major implications financial, emotionally and functionally on many farms across the borough. It is a complex disease with a series of control measures that vary depending on local conditions. Animals are subject to a skin test every 6 months. If an animal reacts the farms TB free status is suspended.

If a negative test is resulted, the whole herd is tested again in 60 days during this period no animals may be moved on or off the holding until a clear test. This is where the proposed unit would be critical to allow the farm to function unrestricted. To allow a farm to become clear, a herd or the animals require two tests at 60-day intervals with no reactors. Again, no animals can be moved on or off the holding for at least 120 days.

The movement bans imposed can last several months due to the challenge of achieving two clear tests. The consequences caused by the movement ban and costs associated with the required testing in this instance can mean cattle cannot be moved between holdings and stocking can effectively reduce the risk and spread therefore potentially prevent an outbreak or reduce the number of animals that have to be slaughtered due to bovine tuberculosis and allowed the herdsman to ensure that the welfare is always maintained.

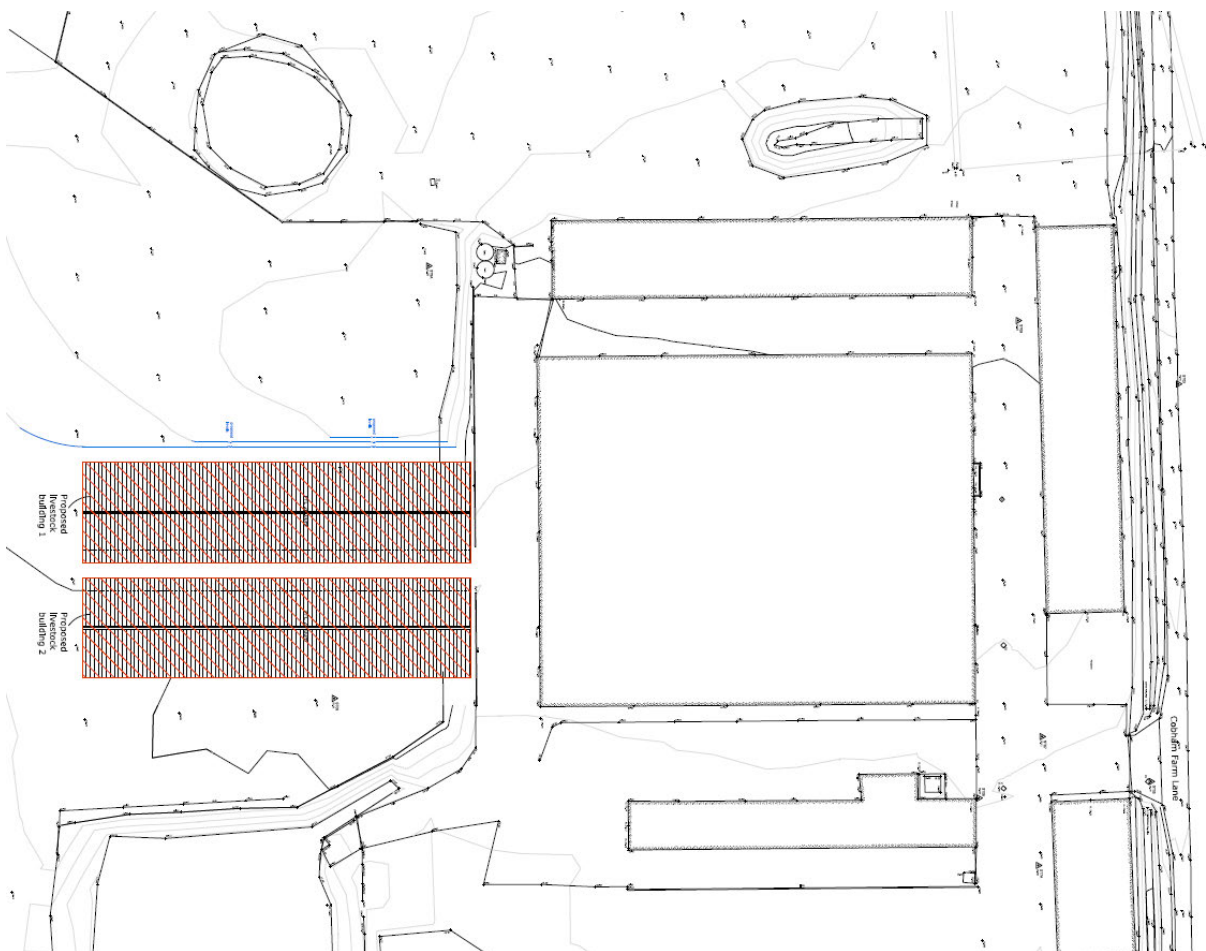


2. PROPOSAL

The subject application is for two new purpose-built agricultural livestock building, an extension to existing facilities for housing of dry cows and young heifers (200 head currently housed off site). The building will be of a standard agricultural construction, Steel portal framed.

The proposal is part of the growth and investment into the dairy operations at Torriad Farm to ensure the farm remain cross compliance to the various regulatory bodies that monitor farm conduct and practice.

The building proposed extends to `1670 sqm, a reaosnable size standard agricultural builing, reasonably necessary for and design for the purpose of any agricultural use within that unit. The proposal replicates the accommodation being lost from off site rearing units, currently used and to be lost for winter 2024/25



It is generally acknowledged that the role of agriculture is recognised as being important to continuing maintenance and management of the open countryside and the viability of rural economies.



3. ASSESSMENT OF ESSENTIAL AND FUNCTIONAL NEED OF THE BUILDING

The area is predominantly rural with agriculture being the primary industry. The proposed site for the agricultural building is at Torriad Farm. The building has been sited to the south of the large farmstead forming a natural extension to the existing large agricultural buildings.

Torriad Farm therefore is in the process of modernising facilities and this application supports the growth and subject investment the applicant wishes to implement at the site. Therefore, the applicant requires the subject building to provide critical house livestock which are reared through a 3-year cycle to join the dairy herd. This is however, at present done off site and is to be lost for winter 2024/25 due to the farm being sold. Without the proposed new livestock buildings at site there will be a welfare issue, the current facilities are not able to hold an additional 200 head of livestock and in turn this would economically hit the business, if sold or if squashed all under one roof.

The proposed scheme is required to enable the efficient operation of the existing agricultural unit and overcome another held experience in farming today. Critically, the business will become financially disadvantaged if unable to continue to grow in facilities.

Importantly, the building is required to fulfil the functional need of the existing farm business, house stock owned and breed by the applicants and to provide accommodation for the livestock in line with the welfare of the Farmed Animal Regulations.

The Welfare of Farmed Animals Regulations 2000 (S.I. 2000 No. 1870) Schedule 1, paragraph 4, states that:

Where any animals (other than poultry) are kept in a building they shall be kept on, or have access at all times to, a lying area which either has well maintained dry bedding or is well-drained;

The Welfare of Farmed Animals Regulations 2000 (S.I. 2000 No. 1870) Schedule 1, paragraph 9 states that:

The freedom of movement of animals, having regard to their species and in accordance with established experience and scientific knowledge, shall not be restricted in such a way as to cause them unnecessary suffering or injury

The Animal Welfare Act 2006 concludes that the maintenance of good Animal Welfare is essential, non-negotiable, paramount and a necessity.

Under the 2006 legislation, not only is it a Criminal offence to cause/allow, unnecessary animal suffering, it is an offence to maintain an environment that is likely to be the cause of any unnecessary animal suffering.

With all species of farm animal, it is not “if a problem arises, it is when a problem arises”.

Science, good agricultural practice, good veterinary practice, good management, welfare organisations and persons who study the needs of farm livestock, all conclude that it is a fact, it is common sense, that the needs of animals on the farm premises are subject to care by the keeper(s) and that the amount of time that the keeper devotes to the correct conditions for livestock is a deciding factor in good care.



The viability of the enterprise is affected if the unit welfare and management is not maintained to the highest degree, which in turn automatically would affect the profitability therefore efficient and effective management is crucial to prevent the enterprise being placed at risk.

are proposing to erect the building to ensure that livestock on the farm have sufficient housing space to carry out their five freedoms as recommended by the RSPCA.

The RSPCA believes anyone responsible for looking after animals should try to provide them with the five freedoms as follows, the animal welfare code prepared by RSPCA in brief entails 5 freedoms, which are defined as:

- Freedom from hunger and thirst
By providing enough fresh water and the right type and amount of food to keep them fit.
- Freedom from discomfort
By making sure that animals have the right type of environment including shelter and somewhere comfortable to rest.
- Freedom from pain, injury or disease
By preventing them from getting ill or injured and by making sure animals are diagnosed and treated rapidly if they do.
- Freedom to express normal behaviour and;
By making sure animals have enough space, proper facilities and the company of other animals of their own kind.
- Freedom from fear or distress.
By making sure their conditions and treatment avoid mental suffering.

Welfare is defined as *“The state of the animal as it attempts to cope with its environment”* therefore generalised in our view this relates to all external (environmental) and internal (physiology) factors which may influence the animal. Hence to maintain good welfare, there must be a suitable farm environment and a disease free non stressed animal.

The above “Five Freedoms” are crucially concerned with animal welfare and the farm environment: Whilst we believe, and this is supported by veterinary practitioners “continual good health of livestock doesn’t just happen”.

The maintenance of domestic animal health requires key fundamentals such as the following which can only successfully be achieved if the presence of a keeper is on site:

- Surveillance and inspection.
- Diagnosis of any poor health.
- Discovery of the cause(s) of poor health.
- Institution of safeguards against repetition of poor health. e.g. vaccinations.
- Treatment of poor health



4. PLANNING POLICY

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that “where, in making any determination under planning Acts, regard is to be had to the development plan, then determination shall be determined in accordance with the plan, unless material considerations indicate otherwise.”

Planning Policy Wales Edition 11 (February 2021)

Planning Policy Wales (PPW) sets out the national land use planning policies of the Welsh Government. It is supplemented by Technical Advice Notes (TANs's); procedural advice given in circulars; and policy clarification letters. National Planning Policy and Guidance is not repeated throughout the Plan, but must be taken into account in managing the development and use of land in the public interest and contributing to the achievement of sustainable development.

At Section 5 - The Rural Economy, PPW states at Paragraph 5.6.6. New development sites are, in most instances, likely to be small and, except for rural diversification and agricultural development to which separate criteria apply.

The proposed plans within this application are in line with the Welsh Technical Advice Note 6 (TAN 6) – Planning for sustainable rural communities (2010) specifically

Agricultural buildings. Meeting the policies related as follows:

- The proposed development will not cause any unacceptable adverse effects on the local landscape.
- The proposed structures are sited and designed to minimize impact on the landscape and is grouped as close as practically possible to existing buildings.
- The proposed building is designed and constructed of materials to take account of their surroundings. Reflective external surfaces have been avoided wherever possible.
- The proposals ensure the farm business is sustainable and will help to provide continued employment for the farmer, his family and employees

Adopted - Wrexham Local Development Plan 2013-2028 (20th December 2023)

The following key policies are relevant -

Policy DM1 Development Management Considerations

This policy addresses the more detailed; site specific issues related to individual planning applications and will be applicable, where relevant to all new development proposals within the County Borough. It needs to be applied in conjunction with other relevant policies and proposals contained within the LDP and seeks to ensure satisfactory standards in new developments, including the implementation of high quality, sustainable design, accessibility and compatibility of land use amongst other key material planning considerations

Policy Policy EM4: Employment Development Outside of Settlement Limits

The purpose of this policy is to set out the criteria against which employment development in the countryside, outside of defined settlement limits would be considered.



The justification states - new developments required by existing rural enterprises such as additional farm buildings, as well as development that facilitates farm diversification, will be supported subject to the development being sensitively located within or adjacent to the complex of existing buildings. It is recognized that isolated buildings located away from established farm or other rural enterprise complexes may sometimes be needed, particularly when new rural enterprises are being established. In such cases, a planning application will need to be accompanied by a supporting statement that sets out why the development is required and why there are no reasonable alternatives.

Policy NE6: Waste Water Treatment and River Water Quality

All new development will only be permitted where there is no adverse effect on the integrity of the River Dee and Bala Lake SAC in particular through the treatment of wastewater. To ensure no adverse effect on the integrity of the River Dee and Bala Lake SAC, development creating wastewater discharges will be required to demonstrate there is no increase in phosphorus levels in the SAC.

In summary:

The Council is aware of the need for continuing investment in modern farm buildings, slurry stores and equipment. Farm businesses need to change and grow in response to market forces and legislation if they are to survive.

The functional need of this building is to ensure the welfare of the livestock housed following the loss of off site rearing farms. The farm complex is defined as the curtilage of the usable farm buildings usually centred around the farmhouse. The building forms a logical extension to the existing farmyard. The existing buildings, hedgerows and trees effectively screen the development from the wider context. The proposal is in adherence to planning policy and is in line with Planning Policy Wales vision for the rural economy.

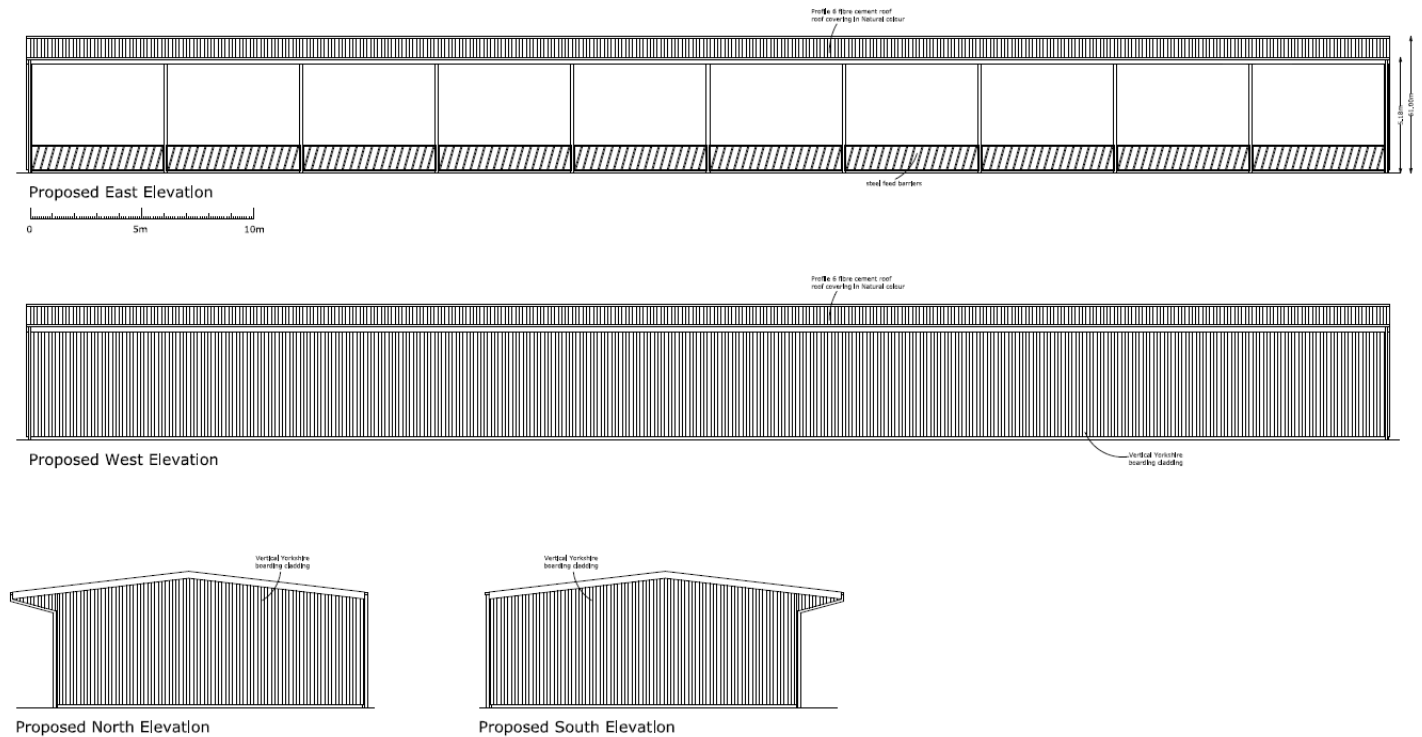
5. DESIGN

5.1. USE

The site is agricultural, and the proposed use will remain within this use class. The accompanying plans show the design and layout for this site and for the ease of management at operations at Bowling Bank.

5.2. AMOUNT & SCALE

The proposed building extends to 60.96m x 13.70m (5.18m to eaves and m to 6.1m ridge) Total floor area is 835 sqm per building. Overall proposed development for the subject livestock building is 1670 sqm. The buildings mirror each other and replicate the other structures on site as shown on the accompanying drawings



The scale and type of the proposed building will be in keeping with the surrounding range of farm buildings within Wrexham Council as can be seen by the plans submitted. The buildings will automatically integrate well with the surrounding area and connect to the existing slurry channels

A portal frame is standard agricultural buildings used for this purpose critically as it allows flexibility internally within buildings. The building design aims to keep a balance between the two aims of the planning system, efficient economic development and protection of the landscape. Local materials have been sourced and

5.3. LAYOUT & LANDSCAPING

The proposal is to be constructed adjacent to the existing complex therefore there will be no requirements to carry out any major engineering works. The access and yard area are that the building will adjoins is already in existence. Overall, the position and layout proposed will provide the necessary livestock accommodation for business purposes whilst respecting the landscape. The building adjoins the proposed produce and feed storage facilities therefore is sited for ease of function.

5.4. APPEARANCE

The proposed structures are as shown on the enclosed drawings; however, the proposal is to be constructed of steel framed, enclosed to three elevations with Yorkshire boarding and concrete panels with a fibre cement roof (natural grey) Feed barrier and central passageway for feeding.



Insert pictures

5.5. ENVIRONMENTAL DESIGN STATEMENT

Wherever practicable, developments shall be designed to reduce energy consumption and maximise energy conservation and maximise energy conservation through use of appropriate materials, design, layout and orientation.

This planning application has taken into consideration the following energy efficiency measures and technologies that can be incorporated alongside wider energy efficient design principles to ensure high energy performance.

The proposed building has been positioned and orientated (as far as possible) to maximise the use of natural daylight and solar energy. This is achieved where possible by orientating the building in such a way to maximise the potential for solar gain by reducing the need for energy consumption. Wherever possible materials will be sourced and produced locally and will come from a source that can be renewed without harm to the environment. High quality reclaimed materials can save resources and may also provide a better match with the surrounding development.

The above points will ensure that the buildings are 'sustainable' in terms of the buildings design and the supply and use of energy in accordance with the Council's recommendations.

5.6. SITE CONTEXT

Planning Policy Wales identifies sustainability as a core element of policy noting at paragraph 2.1: *"The Assembly will promote sustainable development, that is, development that meets the needs of the present without comprising the ability of future generations to meet their own needs"*.

The building is to adjoin an existing structure on an established area of agricultural functioning yard therefore is located on the existing farmyard which complies with Wrexham Councils planning policy. The development site is enclosed by mature boundary forming a natural screen, together with the screening provided by the existing buildings and is surrounded by agricultural land within the control of applicant.

5.7. ACCESS

There will be no changes to the existing access arrangements. Access to remain through main farm complex off Cobham Farm Lane. The proposal will not increase vehicular movements from the site therefore will not have any detrimental impact on highway safety. The proposed building will be for use solely by the person residing at the farm. There are no steep gradients within the proposed site and being existing, there is no engineering works to construct the building or access the property.



5.8. OTHER MATTERS

The proposal is within Flood Risk Zone 1, therefore is not liable to flood. The site is not contaminated. In respect of drainage, rainwater and runoff will be collected and recycled. Manure will be stored in the existing waste handling systems

In terms of environmental sustainability, the site is as located on accompany drawings, an existing working dairy farm. There will be no impact to the environment or its habitat as the proposed site is contained within the established yard area and is already utilised for the rearing of cattle. The building will function as part of the built form

In terms of community safety, the site where the proposed building is to be positioned is already agricultural and is located within established boundaries, fenced/hedged to help prevent unauthorised access to the site

5.9. NATURAL RESOURCES WALES ASSESSMENT

The proposal is for a steel portal frame livestock building that will ensure the enterprise has sufficient housing space to carry out their five freedoms as recommended by the RSPCA. Some of the existing livestock building on site are not suitable in terms of the latest animal welfare regulations.

Torriad Farms Ltd house 340 cattle at Torriad Farm the proposal will not result in the increase of livestock numbers.

The building is a loose housed building, and animals will be bed on straw which will be discharged in to exciting facilities and clean water from the roof will be collected and reused on the farm.

This would constitute an improvement on existing arrangements; it would not result in any change to the number of livestock or volume of foul discharge from the site and therefore there would be no increase in phosphorus contribution. As such, it is not likely to have a significant effect on the River Dee and Bala Lake SAC. All slurry/manure/contaminated water produced should continue to be managed in line with the Regulations.

5.10. PROTECTED SPECIES

A report accompanies the submission confirming there are no impacts to Biodiversity.

6. CONCLUSION

We believe that the proposal is not considered to conflict with or cause any unacceptable harm to any other recognised interest or policies of the development plan. The character of the building is a standard agricultural design and replicates the extant structure the building is to adjoin therefore not an inappropriate form of development for a rural location.

Planning Policy Wales supports sustainable economic development and a prosperous rural economy including the development of agricultural and other land-based rural businesses. It is generally acknowledged that the role of agriculture is recognised as being important to continuing maintenance and management of the open countryside and the viability of rural economies.

Key points in support of the proposed development at Torriad Farm:



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- The proposal agricultural building is reasonably necessary and essential for the applicant long established agricultural unit. The proposal would not have any adverse effects on Wrexham's landscape as the building has been sited on the existing farmyard and designed to minimise the impact on the landscape.
 - The proposed building will not result in the increase of livestock numbers. The clients require the proposed building to ensure they are compliant with the latest welfare regulations.
 - The applicants have been forced to restructure off site facilities to bring matters back to Torriad Farm
 - The design, layout, scale and materials and colour of the new building harmonises with the locality and wherever possible maximised energy efficiency. The existing natural landscaping effectively screens and reduces the visual impact of the proposed buildings.
 - The local road network can accommodate the development as the proposals will not result in extra highway movements and all movements to the shed will be internal.
 - The building is able and sympathetically designed and strikes a balance between practical and economic efficiency and minimal landscape impact.
 - The proposal is of an appropriate location, scale and type so as not to be detrimental to the amenities of any nearby existing residential properties.

Under Planning Policy Wales 'Local planning authorities are required to ensure that the economic benefits associated with a proposed development are understood and that these are given equal consideration with social and environmental issues on the decision-making process and should recognise that there will be occasions when the economic benefits will outweigh social and environmental considerations.'

This proposal has significant merit, fits within the policies of the development plan and national planning guidance, and it is respectfully requested that the submitted planning application be approved.