

Comments on APP/H6955/A/16/3154472

Erection of a free range egg production unit (16,000 birds) including silos and associated works (including ground level alterations and alterations to existing vehicular access) at

Cae Mor, Llwynmawr, Pontfadog, Llangollen, Wrexham LL20 7BE

Visual Impact

No-one who visits the Ceiriog Valley can doubt its beauty and tranquillity. All our visitors including those from the USA and Canada comment on this. As you enter the valley from Selattyn on the B4579 the view is particularly spectacular and wide ranging.

This is described perfectly in Report 2 Pathfinder II - Report on Assessment of land for designation March 2012 prepared for CCW.

The high level views afforded from the foothills into the valley are exceptional and rare; and the landscape is very representative of Welsh cultural landscapes and traditions in the rural borderlands with England.

The same report describes the threats which face this beautiful area.

This landscape is sensitive to any significant development or physical change that might adversely affect the visual settings of the valleys, the historic character of the valley settlements, views to and from the foothills around, or the area's deeply rural tranquillity – for example changes associated with housing, transport, minerals or major infrastructure development.

*The aesthetic appeal and national conservation interest of the area's striking natural landforms and historic sites (including Pandry Rock, Pistyll Rhaeadr and Craig Rhiwarth) are especially vulnerable, but so too are the skylines, landform features, ancient woodlands **and historic field patterns of the valley sides** which contribute strongly to sense of place and **to landscape quality and integrity**.*

In recent years increased commuting; associated highways improvements and lighting; occasional telecommunications masts; infill development affecting village form and layout; conversion of farmsteads and historic buildings; and development of holiday lets, caravan parks and other farm diversification projects, have brought subtle but incremental changes and these pressures continue. Potentially, any large scale development that is inappropriate in siting, scale or character could also have a detrimental impact on approaches to the valleys and foothills and on perceptions of Y Berwyn as a whole. Within the upland fringe farmland, hedgerow loss and over-improvement of marginal pastures are key issues that locally threaten landscape condition. There is still surprisingly limited awareness of the special qualities of this outstanding landscape; and at the present time there is little proactive landscape planning or management as such, apart from some very limited local authority input. The key concern for the Low Berwyn is that, without wider awareness of its special qualities, and in the absence of specialist advice and management, those special qualities will gradually be eroded and lost due to the cumulative impacts of the ongoing, piecemeal changes described above.

The size and location of the proposed building along with the additional infrastructure (including electric paddock fencing) will have a visual impact far greater than envisaged in the report prepared by Viento and confirmed in the report submitted by Julie Barr BA Dip LA CMLI of Tirlunbarr Associates – Landscape Architects.

Economics and Sustainability

One of the arguments being used in support of the application and appeal is the economic need to provide a sustainable income from the current Cae Mor land holding. I am not party to the research undertaken by the applicants to support their business plan and it is notoriously difficult to make economic forecasts, but I feel that the following information is pertinent in terms of egg production trends affecting the viability of this enterprise and hence the justification for the application.

1. 16,000 birds is the lowest economically viable sized unit (see Oakland eggs letter AP38) so the enterprise must be considered marginal in terms of economic production.
 2. DEFRA statistics show increasing levels of production against falls in farm gate egg prices, see extract below from United Kingdom Egg Statistics – Quarter 2, 2016.
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Key results

- *7.2 million cases of eggs were packed in UK egg packing stations during the second quarter of 2016. This represents a 0.5% increase on quarter 1 2016 and a 4.5 % increase on the second quarter in 2015. This shows an increase for the fifth successive quarter.*
 - *The average UK farm-gate egg price through the second quarter of 2016 was 69.9 pence per dozen, a 3.8% decrease on the first quarter 2016 and a 15% decrease on the same quarter in 2015.*
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3. In addition to the above, planning applications for free range poultry units in the last year have increased so the law of supply and demand is likely to come into play creating an increasingly competitive market with lower egg prices.
4. Thirteen planning applications for free range egg laying units have been received by Powys CC since September 2015. See Appendix A

The proposed enterprise is stated as being marginal by Oakland eggs (see APP28) and given the current trend in egg prices it may not be viable long term. Once this building and infrastructure has been constructed it would be expensive, if not impossible to return it to the original grassland state. The appellant states in the application that Site D is the only viable option and given the layout of the holding, being split by both a footpath and minor road, it is difficult to see how the size of the unit could be increased (even if that were desirable) to meet the necessary range standards in order to make it more economically viable.

Appellant Statement

Throughout the appellants supporting documentation many references are made to a previous application for a poultry unit within Wrexham CBC (APP/H6955/A/14/2228984) and parallels are drawn, particularly in relation to Policy EC3.

Policy EC3 states that *The construction of new agricultural buildings will be permitted unless the development is materially detrimental in terms of its impact on the environment or surrounding landscape.*

In her report on the Cae Mor proposal, Julie Barr states that:

17. Para 36. I agree that the proposed building would constitute a significant adverse change to the character of the site landscape and wider afield.

Policy EC3 also states that: *The development should form part of an existing farm complex and take advantage of topography and other landscape features for screening. Isolated buildings will only be permitted in exceptional circumstances where there is an essential agricultural need, and no reasonable alternative for the development.*

- On the ground it is now difficult to identify Cae Mor as ‘an existing farm complex’, the ‘new’ agricultural building being on the opposite side of the minor road across from the house, and hence even further from the proposed site.
- The house where the original farm complex was sited when owned by the Lewis family is approximately 250 metres from the proposed development, so must be considered as ‘isolated’.

To defend this argument that the development is not isolated, the appellant refers to Paragraph 22 of an Appeal Decision relating to APP/H6955/A/2228984 Talwrn Farm, Legacy, LL14 4ER, which states that:

“I am satisfied that whilst the proposed building would be set apart from the existing farm buildings it would not appear isolated from the built environment in the wider landscape.”

Further, Appeal Decision ref: APP/H6955/A/2228984 Talwrn Farm paragraph 6 supports the above view

The appeal site is adjoined on most of its boundaries by agricultural land with the exception of the Scottish Power to the south west. There is a variety of residential properties scattered across the local area, the nearest being a line of dwellings on the opposite side of Talwrn Road and a further cluster to the north of the junction of Talwrn Road with Smithy Lane. On Bronwylfa Road, to the north of the site, there is a further line of dwellings together with the large and imposing Legacy Water Tower and the infrastructure of the power station.

While Talwrn farm is also set within an SLA, in no way can it be considered comparable in situation with Cae Mor . The proposed site for the Talwrn unit was in a field immediately next to an SP site. Map based study using OS maps and Google earth clearly identifies the site as lower lying with considerable infrastructure and buildings in the immediately surrounding area, including power sub stations. When visiting the locality, it was also noted that there was a proliferation of large metallic electricity pylons, unsurprising given the location of the SP Legacy substation. As such it does not appear isolated from the built environment in the wider landscape unlike the situation at Cae Mor.

Paragraph 20 of Appeal Decision ref: APP/H6955/A/14/2228984 Talwrn Farm states:
The aim of the appellants is to make the small holding a viable concern but given the limited land available there is a need to consider intensive farming methods. The appellants content that the proposed unit would enable the business to support two employees. Whilst I have not seen any figure regarding the contribution the proposed egg laying unit would make, I have no reason to conclude that the operation would not help ensure the future viability of the small holding.

It should be noted that the holding at Talwrn is much smaller than that at Cae mor resulting in fewer business options.

APPo8 Diversification Statement for Cae Mor says the following:

It is fact that the employment of current employees, 2 locals will be indeed safeguarded if this proposal is to go ahead, and it is envisaged that 3 part roles for local people will be created once the unit is operational. This is alongside the local businesses that will benefit from the establishment of the unit, local groundwork operators, builders, concrete suppliers, electricians, steel fabricators etc.

The general consensus is that 2 full time positions are required to support a 16,000 bird unit. Whilst it is appreciated that the appellants may wish to increase the revenue generated from their holding, it is unlikely that it is essential to safeguard their employment given that there are already a number of other local enterprises with which the family is involved. There is no reason to suppose that this enterprise will further safeguard their local employment given the economics of the new agricultural enterprise.

APPo8 Diversification Statement also makes the following claim:

Farm diversification is the main driver for this enterprise, to gain a further income stream from alternative use of the land to establish a viable farming enterprise.

Section 6 of APPo8 states that:

The defra & welsh government definition of a diversified enterprise is “The entrepreneurial use of farm resources for a non-agricultural purpose for commercial gain.

Hence, diversification reflects the reduced dependence of farmers on agriculture as a source of income. Diversification also implies some kind of entrepreneurial activity on behalf of the farmer. (Defra - Farm Diversification in England: 27/01/11)

These statements appear to be contradictory to the aim of the appellant as this may be a change in use from pastoral to intensive farming but is not **diversification** in terms of the DEFRA and the Welsh government definition as stated. TAN6 suggests some alternatives, see below:

3.7.2 Many economic activities can be sustainably located on farms. Small on-farm operations such as food and timber processing and food packing, together with services (e.g. offices, workshop facilities, equipment hire and maintenance), sports and recreation services, and the production of non-food crops and renewable energy, are likely to be appropriate uses.

Conclusion

There is still surprisingly limited awareness of the special qualities of the outstanding landscape in the Ceiriog valley, and those special qualities will gradually be eroded and lost to future generations as a result of developments such as this. As a local landowner I can understand the desire to increase income, especially with the uncertainties surrounding agriculture at the moment, but as custodians of this landscape for future generations we must be aware of its special qualities. I can only agree with the WCBC Planning Officer's decision to refuse the development.

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Appendix A - Planning Applications in Powys relating to egg production

Planning App No	Date Submitted	Description
P/2015/0779	10/09/2015	Erection of a free range egg production unit including silos and associated works
P/2016/0001	13/01/2016	Erection of an agricultural building for free range egg production, together with internal farm access and associated works
P/2016/0133	03/02/2016	Erection of a poultry unit to accommodate 32,000 chickens and all associated works
P/2016/0193	22/02/2016	Erection of a free range poultry unit to include feed bins, new access and associated works
P/2016/0238	14/03/2016	Erection of free range egg production unit and associated works
P/2016/0317	21/03/2016	Full: Erection of extension to existing free range egg unit and associated works and retrospective approval of the installed ventilation system on the existing free range egg unit.
P/2016/0585	25/05/2016	Erection of an agricultural building for egg production
P/2016/0617	09/06/2016	Erection of free range egg production unit and associated works
P/2016/0641	13/06/2016	Erection of an agricultural building for free range egg production
P/2016/0608	04/07/2016	Erection of an 16,000 egg unit, creation of access and associated landscaping and engineering works.
P/2016/0755	13/07/2016	Erection of an extension to an existing free range egg unit (Extension 1) in conjunction with Extension 2 to give 32,000 birds
P/2016/0700	15/07/2016	Construction of a 16,000 bird free range egg production unit with infrastructure including hardstanding
P/2016/0776	22/07/2016	Erection of free range egg laying unit

