

Comments on Planning appeal H6955/A/3154472

Free Range Egg Laying Unit Caemor Llwynmawr
Pontfadog LL20 7BE

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1.Introduction

This development is within a locally designated Special Landscape Area. It is known for its peace & tranquillity. “A little piece of Heaven on Earth” (Lloyd George) . Contained within the wider development there is a local wildlife site. There are 2 footpaths in the vicinity. The proposed building is considerably larger than any other building in the Ceiriog Valley.

2.Viability/ Sustainability

Due to the nature of the site it will be difficult to maintain and more expensive to build. This puts it at a disadvantage economically to other businesses of a similar nature where the site is more suited for this type of development. With the advent of subsidies there has been an increase in planning approval for egg production units. Current statistics show a downward trend in egg prices. In the diversification statement it is stated :

“After much brainstorming, research and investigation the partnership are focused on the production of Free Range Eggs with the investment into a 16,000 bird unit.”

Apart from the dismissal of the traditional rearing of beef and sheep there is not much evidence of what other “diversification” businesses were considered which may be more suitable for this site and still bring in sufficient income to support the holding.

It is highly possible that due to the extra costs involved with this site it will be unable to compete effectively in the falling market with other more efficient producers and not be viable or sustainable.

3.Benefits

One of the benefits of this development is given in this quote in the Diversification Statement:

“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”

I have to question this fact. If the 2 locals i.e. the two partners are employed full time in the business, then this would be a fact, but as one partner is currently employed by another company then this fact is only partially true.

It is also suggested that 3 part time roles will be created once the unit is operational. What little research I have been able to undertake leads me to

suggest that 3.5 FT equivalent workers is rather high for such a unit so making the unit inefficient.

It is further stated that:

“Another benefit is the possible retention of employment for the egg packing station and the increased business for the feed merchant”.

I don't know of any planning application that I have read over the last few years that don't state that their development will benefit local businesses. It is probably true that the local builders, concrete suppliers and steel fabricators will benefit. This will help to maintain their employment, but it is only temporary during the building operations. It is permanent continuous full time employment that is needed to benefit the community. On this development it seems it could be only 1 to 3.5 FT equivalent jobs. There are no figures given for how many jobs would be safeguarded at the packing station or the feed merchant.

The beauty of the Ceiriog Valley, its landscape and the peace and tranquillity are one of the draws for tourists. The many walks, bridle ways, cycle routes and local trails provide the outdoor activities that are encouraged for health & wellbeing. A recent survey by STEAM has shown that there has been a significant (11%) increase in visitor spending within Wrexham County Borough in 2015.

There are five hotels within the valley that rely on visitors and tourists to survive and provide employment. There are B & Bs and self –catering establishments that need tourists to visit the valley and its environs. Any diminution in the peace and tranquillity and degrading of the landscape could damage their trade. Some of these businesses are true farm diversifications.

4.Diversification

It is debatable whether this is a true diversification project in terms of the definition quoted in the document AP08 Diversification statement.

All definitions are open to interpretation, but as stated in the preceding paragraphs, (3 para 2)one of the partners is employed in a non- agricultural business.

5.Highway

Any concerns regarding traffic etc have just been dismissed on the basis that the B classification should ensure that the road is deemed fit for the required vehicles. The only details given are for the feed deliveries and egg collection. Details of type of vehicles or frequency of removal of the manure to the Oswestry farm do not appear in the documentation.

I have observed that there has been an increasing use of this road by cyclists who come in via Chirk Station and cycle up this way. There is also some cause for concern with regard to certain junctions one of which is not within the Wrexham County Borough see appendix photos 1, 2, 3, 4

Some concerns were expressed regarding the inability to deliver essential feed during bad weather periods. Ref Photo 5 . It is suggested that extra feedstuffs will be stored during these periods. The question has to be asked as to whether there is sufficient storage capacity within the current building without any amendment to the current plans.

6.Manure management

There is extremely limited information on this subject. There is no indication as to how long & how it will be stored at Caemor. It is important that some guarantees are given that it will be transported to a farm near Oswestry at least 6 miles away for disposal to avoid any further nuisance.

I wish to express some concerns about the suitability of the use of SCAIL as a means of establishing the ammonia air content. In the Sniffer ER:26 final report March 2014 it states

□ Land cover: The land cover within the modelling domain should be fairly uniform, preferably without the influence of built-up areas, which can complicate the dispersion processes due to additional turbulence and heat fluxes;

- Terrain: The topography of the modelling domain should be reasonably flat in order to avoid the use of complex model terrain algorithms;*
- Source location: Ideally the source should be located in an area of fairly homogenous land cover and far from other sources, which could interfere with the measurements.*

And

Sampling periods; multiple sampling periods should be used and the total measurement period duration should be as long as possible to capture seasonal variations preferably one year or more

I admit that I may be misinterpreting these statements but it does cause me some concern that the model used to determine and measure ammonia content may not be suitable for this particular area. I would like to be assured that the sampling method is robust and that suitable monitoring can be put in place, and there are solutions to deal with any problems that occur.

7. Conclusions

On the issue of Visual amenity I cannot claim to be an expert, but I fail to see how this large building can be accommodated within the landscape and not be visible from a wide area. Associated development such as paddock fencing, lighting, access road etc will not be in keeping with the landscape. Any detrimental changes to this landscape could affect the tourism related businesses within the Valley so harming employment. With the drive from Wrexham CBC tourism within the valley is becoming increasingly important.

Due to the difficulties of the site it is questionable whether this business will be viable or sustainable in the long term.

It is debatable as to whether this is a true farm diversification based on the definitions given in AP08 Diversification Statement.

Having read most of the documents I am still unsure what the special circumstances are that make this development acceptable.

These along with the possible issues concerning water, traffic, smell etc leads me to support Wrexham Planning department and Planning committee in their refusal of this development.

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Appendix

Safety concerns B4579

Staggered Crossroads near Sellatyn School

Junction near Mount Ceiriog Trail crosses B4529

Bends and steep gradient Craignant

Narrow Bends @Nant Fowc photos 1 2 3 4

B4579 Road subsidence above Brithdir

Crossroads @ Bedwlwyn

Crossroads by Tyn Y Fron

Photos 1 Photos giving views of Nant Ffowc bends



Photos 2 Photos giving various views of Nant Ffowc bends



Photo 3 Photos giving various views of Nant Ffowc bends



Photo 4 Photos giving various views of Nant Ffowc bends



Photos relating to A Pick submission

Photo 5



Photo taken Easter 2013 Entrance to Caemor road on right