

Design and Access/ Supporting Statement For Pre Application Consultation

Erection of new livestock buildings including covered feeding, loafing yards and associated works.

**at
Clunderwen Farm,
Clunderwen,
Pembrokeshire,
SA66 7PN.**

1 **General Description**

- 1.1 The proposed development involves the erection of two new livestock buildings with associated loafing, feed and storage facilities to provide improved animal husbandry and welfare standards. The proposed buildings would be adjacent to each other each measuring a footprint 77 metres long by 33 metres wide with a pitch roof design reaching a ridge height of 8.9 metres. The buildings ground level would be, circa A.O.D 84.00 and located to the northwest of the existing farm complex. The buildings would have a pitched roof with a cantilever design adjacent to each other. Both buildings would cumulatively cover a footprint of 5082 square metres (2541 square metres each). The buildings would accommodate 308 cubicles, loafing and covered feeding with A.I facilities and the storage of items such as cow bedding chemicals associated with the operation. The proposal also includes rainwater harvesting tanks and landscape biodiversity enhancements. The objective of the development is to modernise the cubicle housing for the dairy herd and utilise the existing buildings for young stock via loose housing accommodation.

2 **Application**

- 2.1 This Design and Access Statement (DAS) has been prepared in support of a Full Planning Application for agricultural development at the above address. As required by the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. The development constitutes major development as the floor area of the building exceeds 1000m². The DAS explains, amongst other things:

- (a) the design principles and concepts that have been applied to the development,
- (b) demonstrates the steps taken to appraise the context of the development and how the design of the development takes that context into account,
- (c) explains the approach adopted as to access, and how policies relating to access in the development plan have been taken into account; and
- (d) explains how specific issues which might affect access to the development have been addressed.

The statement deals with the legislative requirements of a DAS and planning policy considerations.

- 2.3 The statement has been prepared by Preseli Planning Ltd appointed by Clynderwen Farm Dairy Ltd. The statement is based on information supplied by the applicants and other consultants involved in the project. Please refer to the submission plans for detailed information.

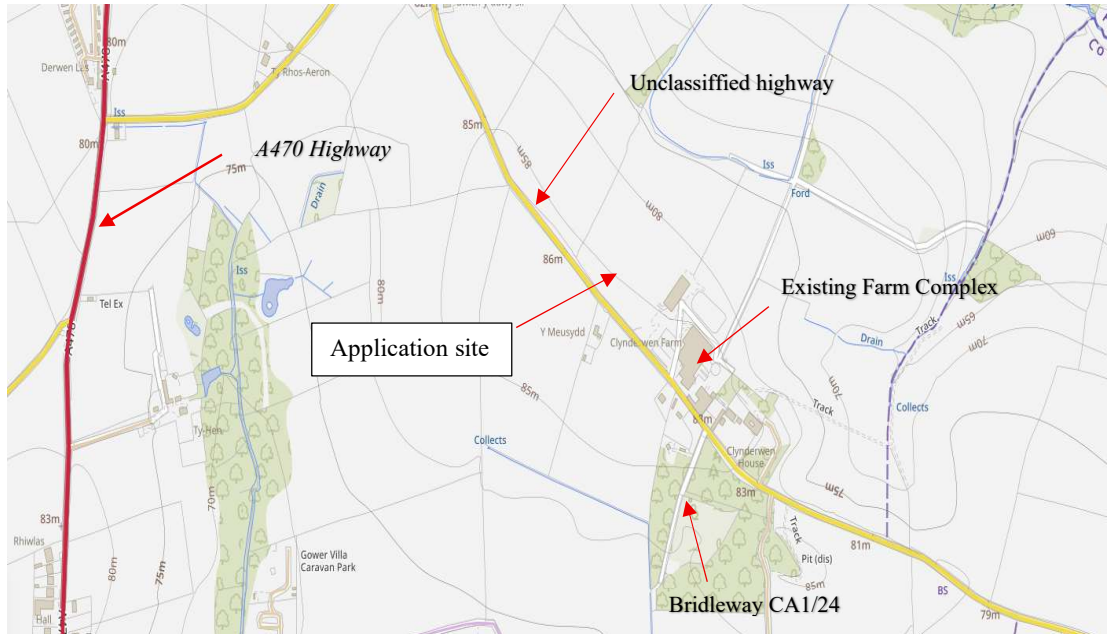
2.4 **Applicant**

Clynderwen Farm Dairy Ltd, Clunderwen, Pembrokeshire SA66 7PN.

3 **The Site**

- 3.1 The site is located in Pembrokeshire, approximately 800 metres to the north east of the Clunderwen settlement (as the crow flies). The farm complex is directly adjacent to a minor road which links to the A470 highway in a north west direction and Llanfallteg to the south east.

3.2



Source: Data map wales

3.3 The site currently consists of a parcel of improved grassland. This parcel of land is enclosed by established hedgerows to the north, east and west aspects. The south aspect comprises of the existing dairy farm complex. Beyond the operations farmstead are private dwellings and school known as Red Hill. The existing farm complex generally consists of steel frame buildings to house livestock and associated dairy farm infrastructure such as silage clamps and slurry stores. A public right of way (Bridleway CA1/24) is located to the south west and adjacent to the farm complex.

3.4 *Recent site history-*

25/0269/PA- Erection of a steel frame building- Conditionally approved 26th August 2025

24/1034/Agricultural and machinery store-No objection 11th March 2025

19/0460/PA-Agricultural storage building-Conditionally approved 19th September 2019

18/0358/PA-Agricultural building-Conditionally approved 14th September 2018

11/0137/PA-New Slurry lagoon-Conditionally approved 6th Jul 2012

4 **The Enterprise and the Proposal**

4.1 The aim of the development is to provide a modern, efficient welfare enhancing cow housing and covered feeding buildings adjacent to the existing complex.

- 4.2 The enterprise operates as a dairy farm covering over 500 acres. The main milking herd comprises of circa 280 dairy cows and a further 235 head of young stock. The young stock form followers to the dairy herd. The purpose of this development is to construct a new dairy unit immediately to the north of the existing enterprise. A building which has benefitted from planning permission (Planning reference 25/0269/PA) would accommodate a rotary milking parlour with the two proposed buildings forming livestock accommodation and storage to migrate the existing dairy herd from the existing complex. Cubicles from the current buildings would then be removed based on their poor condition and converted to provide loose housing to accommodate the youngstock.
- 4.3 The current cubicles are too small by current standards, in terms of bed size, space, loafing areas and feeding areas. The proposal would enhance these standards for the dairy cows and allow the existing cubicle housing to be modified to loose housing for younger stock. The existing cow housing and milking parlour is over 30 years old and requires upgrading and investment. The proposed buildings would provide modern housing offering the highest level of animal welfare and health standards, future proofing the enterprise for years to come and safeguarding existing employment. It should be noted that there is no intention to increase livestock numbers within the enterprise but to enhance welfare and management arrangements as well as migrate the intensive agricultural operation (Milking process) to the north. This would increase the separation distances from sensitive receptors such as the school and neighbouring dwellings which are located immediately to the south of the current complex.



The image above illustrates the existing cubicle housing and narrow passages/ loafing areas. These are insufficient for the Holstein Friesian herd, which are physically bigger compared to the historic pure Friesian herd that existed 30 years ago.

- 4.4 The buildings would each measure approximately 77 metres long by 33 metres wide providing a total footprint of approximately 5082m². Both buildings would have an eaves height of approximately 3.6 metres and a ridge height of approximately 8.9 metres and be in parallel to each other. The development would include levelling of the site and adjoining land; drainage works and planting enhancement.
- 4.5 The development would also include underground slurry channels to connect to the existing slurry store to the south. The slurry store provides the necessary 5 months storage capacity, complying with The Water Resources (Control of Agricultural Pollution) Wales 2021. This has been confirmed by a recent Pollution Prevention Assessment undertaken by NRW dated 16th August 2024, where the farm was fully compliant. As mentioned above, the proposal would facilitate the removal of a number of cubicle beds, in place of loose housing to the existing buildings which would generate Farm Yard Manure (FYM) as opposed to slurry. There is currently sufficient capacity within the existing slurry lagoon to accommodate all the slurry generated by the animals, which would not be increased because of the proposed development.

4.6



Extract of proposed site plan.

- 4.7 Existing stock consists of:
- 280 milking cows
 - 235 followers

It is noteworthy that the RSPCA Assured Welfare Standards (amongst others) require a minimum of at least 5% more useable cubicle to cows to be provided and preferably 10 to 20%. It is therefore essential that more beds than animals are accommodated within the housing arrangements. Source: RSPCA Welfare Standards for Dairy, June 2021 [ad895c3e-6bb8-fe7a-87a4-b16f10778e1c \(rspca.org.uk\)](https://www.rspca.org.uk/advice-and-legal/welfare-standards-for-dairy)

4.8 The holding consists of:

Total 518 acres

4.9 The enterprise employs 4 full-time and 2 part time members of staff.

4.10 **Consultation and Collaboration.**

4.11 Redstone Architecture prepared the plans to accompany the application

4.12 Red Kite Ecology has carried out a scoping survey of the land. The findings of the survey can be found in the accompanying report.

4.13 NRW conducted a Pollution Prevention Assessment of the holding dated 16th August 2024, which identified there were no non compliances of CoAPR or SSAFO regulations.

5 **Policy Considerations**

5.1 **National Planning Policy**

- Planning Policy Wales (Edition 12, 2024).
- Future Wales The National Plan 2040 (2021)
- Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009).
- Technical Advice Note (TAN) 6: Planning for Sustainable Rural Communities (2010).
- Technical Advice Note (TAN) 12: Design (2016).
- Technical Advice Note (TAN) 23: Economic Development (2014).
- The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (as amended, 2011, 2015).

5.2 Local Development Plan for Pembrokeshire (LDP), adopted by Pembrokeshire County Council 28 February 2013.

- Policy SP 1 Sustainable Development
- Policy SP 16 The Countryside
- Policy GN.1 General Development Policy
- Policy GN.2 Sustainable Design
- Policy GN.22 Prior Extraction of the Mineral Resource
- Policy GN.37 Protection and Enhancement of Biodiversity
- Policy GN.38 Protection and Enhancement of the Historic Environment.

5.3 Policy SP1 requires that all development proposals must demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised. The development would provide positive economic impacts by strengthening the viability of the farm enterprise for years to come, securing employment associated with the enterprise, providing on site employment during the construction period, as well as strengthening local supply and service businesses in the locality. Positive social impacts would be realised by reason of the economic benefits and through providing efficient and functional working environment and enhancing animal welfare. Positive environmental impacts would be achieved through providing well designed buildings at forming a natural extension of the existing complex, which would increase the separation distance of the intensive farming operation between the sensitive receptors such as the school and neighbouring dwelling to the south. Adverse impacts have been minimised through sensitive design and siting of the development and mitigation provided on the green infrastructure statement and drainage strategy.

5.4 The development would accord with policy SP16, being an enterprise and development for which a rural location is essential. The proposal would minimise visual impact through the sensitive design of the building, lowering of existing ground levels and siting next to the existing farm complex. Considering the above, the general principle of development is acceptable.

5.5 **Design Principles and Concepts**

5.6 Planning Policy Wales (12th Edition) and Technical Advice Note 12 (Design) 2016 identify good design as being the consideration of; access, character, community safety, environmental sustainability and movement. With these issues in mind, the following sections of the statement discuss the main design principles and concepts of the proposal before discussing certain issues in greater detail.

5.7 *Character-* The area is rural in character with extensive areas of agricultural land with farm holdings and isolated dwellings scattered amongst the landscape. The building would be a typical agricultural style building located immediately adjoining the existing farm complex. The height of the proposal would be lower compared with recently approved and existing buildings located to the south. This is further discussed relating to character below.

5.8 *Community Safety:* There are no bridleways or footpaths crossing through the existing farm complex, existing gates, signage and security arrangements would prevent public and unauthorised access to the site itself. The dwelling known as Y Meusydd is partly owned by the director of the current farm enterprise. Beyond this the the closest non-associated dwellings (approximate distance to curtilage boundary) would be located circa 170 metres to the south of the site. The existing farm complex is located between the proposal and the neighbouring property. As the development entails migrating the intensive element of the dairy farm operation (for example milking) further away from the nearest neighbouring dwellings/ private school, the development would provide a community benefit.

5.9 Given its rural setting, nature of the existing farm complex which will not be intensified, the separation distances and partial screening offered by the existing hedges and proposed landscaping, the development would not give rise to significant impacts upon the living conditions of residents, either visual, air quality or odour.

- 5.10 *Environmental Sustainability:* As with any steel portal building, a significant amount of the material would be pre-constructed off site, ensuring accuracy and efficiency in production. These would include pre-cast concrete panels for the lower walls of the buildings, Yorkshire boarding for upper parts of walls, fibre cement sheets for the roofs and pre-constructed steel sections for the framework. A local builder with experience in dealing with steel and agricultural buildings would be the principal contractor for the development, minimising unnecessary vehicular movements associated with the build. In terms of surface water arrangements these have been acknowledged and address in the accompanying drainage strategy.
- 5.11 The design of the buildings would ensure safe, efficient comfortable internal spaces for the animals and workers, enhancing animal welfare and reducing future modification or redevelopment disruption.
- 5.12 The position of the buildings at the centre of the land holding would reduce traffic associated with moving stock representing a clear gain in terms of the carbon footprint of the enterprise. The western hedge would be retained and additional planting included to the north of the proposed building.
- 5.13 *Movement-* As the development would not intensify or increase stock numbers and the farmsteads access arrangements would remain, the number of vehicular movements following the completion of the development to the farmstead would not materially change. Provision would be made for associated machinery such as feeding equipment in an around the building via a bound concrete surface, which requires low maintenance.
- 5.14 *Amount of Development-* Agricultural buildings with a cumulative floor area of 5082m² would be formed of two ridged buildings in parallel to each other. The purpose of the development is to provide covered housing, feeding and loafing areas for the cows. This requires an uninterrupted internal space that could only be achieved through a utilitarian style building.
- 5.15 **Appraisal of site context and how the design of the development takes the context into account.**

The site forms part of an agricultural field adjoining the existing complex. The complex consists of large utilitarian style agricultural buildings and structures. Walls are corrugated sheeting or Yorkshire boarding, and roofs are fibre cement sheets. The site is surrounded by agricultural land to all directions and distinctly rural, but the presence of farm complexes and individual dwellings is a strong characteristic of the wider area. Views of the existing site are limited to short distance based on mature woodland which line watercourses to all aspects. As the application site would be located next to the existing established complex, the proposal would also be viewed as a natural extension.

- 5.16 The buildings would be partially screened from the north by mature trees which align the river Rhydybennau. Based on the site levels being 2 metres below the highway screening would be provided to the west by existing hedge banks, as per the accompanying block plan this screening would be enhanced and provided to the north with additional planting. As per the cross sections drawing (P04), the ground levels and ridge heights of the proposal would be reduced compared to the existing buildings to the south (the development would have a ridge height of 93 metres AOD,

whereas the highest existing livestock ridge line reaches 95 metres AOD) Therefore, based on the proposed buildings being screened by compensatory landscaping features and the existing infrastructure heights, the development would not be visually prominent in the landscape.

5.17



View from Bridleway CA1/24 (located 300 metres to the south) mature woodland screens viewpoint from this receptor towards the application site which is located to the north.

5.18



Source: Google earth

View from a north direction of the adjacent unclassified highway, existing hedgerow would provide some screening. This will be re-inforced by addition planting as part of the biodiversity enhancement. As referenced in the statement the proposed roof ridge would be 2 metres less than the highest existing building ridge line.

5.19



The above image is around 400 metre to the north of the site. From here only intermittent views of the farmstead are visible through gateways as existing hedgerows provide screening.

5.20



Source: Google earth

Existing screening present from the south of the unclassified highway. The building will only become visible when immediately adjacent as the existing silage clamps would screen the development.

5.21



Image above is taken from Gower Villa located to the south of the application site. As you can see based on the mature tree line, the Clunderwen farmstead is not visible from this vista

5.22



Application site. The proposal will have a matching ridge line to the existing building.

The above image was taken 1.4 kilometres to the north of the application site at the road junction opposite Fronrhydwen, as land levels rise. The second image is a zoomed in image. As you can see based on the proposals ridge lines not rising above the existing infrastructure and being immediately adjacent, the development will not form an exposed feature upon the landscape. The development will also be screened to the south via the backdrop of existing mature woodland.

5.23 Scheme Development

A number of alternative designs were considered before proceeding with the current scheme. These included:

- A single span building under one pitch. This was discounted due to the higher overall ridge height of the building and resulting in a dominant visual appearance.

5.24 In response to the above, the building has been designed as a double pitched structure with central canopies to enclose the feed area. The split of the building and its starting ground level has resulted in the building having a reduced ridge height compared to the existing buildings to the south by 2 metres.

5.25 Materials would consist of concrete panels, Yorkshire boarding and fibre cement roof sheets.

5.26 Animal welfare is high on the agenda which has the potential to reduce veterinary and care costs as well as increasing milk yields. The scheme would safeguard the enterprise against future changes in welfare standards.

5.27 Character, Visual and Landscape Issues

5.28 LANDMAP is an all-Wales landscape resource where landscape characteristics, qualities and influences of the landscape are recorded and evaluated. The Natural Resources Wales website states that it is a tool to help sustainable decision-making and evaluates 5 spatial datasets. The hedge to the west of the site constitutes the boundary to the aspect areas. Summary of area values below:

Spatial Data Set	Value
Geological Landscape	Moderate
Landscape Habitats	Moderate
Visual and Sensory	High
Historic Landscape	Moderate
Cultural Landscape	High

Source: [Data catalogue](#) | [DataMapWales \(gov.wales\)](#)

5.30 In summary, it is not considered the proposed development would result in significant adverse effects or result in a change in the characteristics of the landscape.

5.31 No geologically significant features would be affected within the site. The habitat value of the site would be enhanced through the landscaping/bird and bat boxes, as discussed in the accompanying ecological survey and green infrastructure statement.

5.32 Whilst being partially visible from close proximity in the surrounding highway network, it is not considered that the development would change the character of the area or result in significant adverse impacts, given the character of the existing complex and partial screening which will be enhanced with further planting.

5.33 The proposal would respect the existing field parcels and relate well to the existing complex. The site is most prominent from the adjacent unclassified highway to the west, however from this

direction the building would relate well to the existing complex. The proposed buildings would be 2 metres lower than the ridge of the tallest building within the complex, as illustrated by the cross section dwg no P04. Furthermore, the opportunity to view the site from the A478 would be limited based on the intervening-built environment of the Clunderwen settlement and strip of mature woodland, which runs in a north to south direction. Time to view and experience the development from the public right of way to the south west would also be limited and intervened by mature woodland. The building would be visible from further viewpoints located to the north east, however it would be viewed amongst the sites existing infrastructure and not cause any further visual harm upon the landscape. Based on the above, it is considered that the development accords with policies *GN.1* and *GN.2* of the LDP in relation to the design, landscape impact, and compatibility of the development.

5.34 Historic Environment

5.35 There are no historic records or designations on the application site or in the immediate vicinity of the complex. There are no known historic records or assets in 800 metres of the application site. The nearest are Cugiau Round Barrows (CM309) which forms a schedule ancient monument located approximately 830 metres to the north west of the development. There is also a grade II Listed building known as Eithin-Man (reference 82466) located 900 metres to the north east of the application site. Other features are beyond 1 kilometre of the application site.

5.36 Given the character of the existing complex and intervening topography, built environment and landscape features such as dense woodland, the proposal would not impact directly or indirectly upon any historic assets and would not affect the LANDMAP classification of the surrounding landscape. The development would therefore accord with criterion 3 of policy GN.1 and policy GN.38 of the LDP.

5.37 Biodiversity, habitats and species

5.38 The site is not subject to any designation and is located outside the River Special Area of Conservation (SAC). A protected species survey of the site was carried out by Kite ecology. The report concluded “While there was no evidence of protected species on site, the development should be used as an opportunity to improve the biodiversity of the site”

5.39 Biodiversity enhancement measures would be provided in the form of bat and bird boxes and additional planting to an existing hedge line and the north of the building. Details of the additional planting have been included on the accompanying dwg P01 and Green Infrastructure Assessment.

5.40 The proposed building would be located immediately adjoining the existing complex and therefore it is understood that the proposal would be considered an existing source, in terms of ammonia generation. Furthermore, given the fact that there is no increase in herd size considering the enterprise as a whole, but rather a relocation and re-development of the existing enterprise, the scheme is considered acceptable in this regard.

5.41 **Policy and Approach to access.**

Access and Movement to and within the site

- 5.42 Policy GN.1 of the LDP and in particular criterion 5 outlines the policy approach to assessing highway implications and states that:

“Development will be permitted where: it would take place in an accessible location, would incorporate sustainable transport and accessibility principles and would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network.”

- 5.43 In planning policy terms, the scheme complies with the aims of policy GN.1 criteria 5&6 of the LDP, in that it would not overwhelm the local highway network and makes appropriate provision for access both within and around the site by using the existing farm entrance. Based on stock numbers not increasing the number of vehicular movements to and from the site would remain unchanged following the development. Due to their being no material change to vehicular movements to and from the existing farmstead, the proposal is considered to comply with the relevant criteria from policy GN.1 relating to access.

5.44 **Specific Issues affecting access.**

- 5.45 The highway network provides good access routes to the site, for the amount and type of vehicles associated with a modern farm.
- 5.46 The existing access provides a good standard of access and there is ample space within the complex for parking and manoeuvring of vehicles. Surfaces in and around the farmstead are generally hard wearing forming a bound concrete material finish and maintained through day-to-day use and inspection.

5.47



Images above are views from the adjacent unclassified highway of the existing access, which provides a direct access to a length of beyond 45 metres. This arrangement will remain unchanged following the proposed development.

- 5.48 In terms of the typical vehicular movements to and from the existing farmstead these comprise of the following:
- 5.49 At present, there are circa 4 vehicles to the property each day (6 movements) with a milk tanker attending the site every other day (2 movements). There would of course be busier periods throughout the year during harvest and other periods either side of the housing period, but these are not regular movements.

- 5.50 In terms of future movements, it is contended that the typical daily movements would remain unchanged due to no increase in livestock numbers or an intensification of the operation.
- 5.51 In terms of Construction traffic, there is adequate space within the existing yards to accommodate the construction traffic there is also negligible chance the vehicles would back onto the highway. In terms of construction materials, the majority of the building would be constructed off-site and brought to site by articulated lorry in the form of sections of frame and lower walls. Excavated material would in the main remain on site to reinforce banks, tracks and yards.
- 5.52 An area would be provided to the north east of the yard for construction vehicle parking, loading and unloading with signage indicating as such. The configuration of the yards ensures that animals and farm staff can easily be kept away from the construction traffic.
- 5.53 The relationship of the existing buildings and the development would allow the construction work to be completed, before the two buildings would be utilised as part of the existing farm complex, ensuring construction traffic could be kept separate to the day to day operations of the holding.

5.54 Drainage

The development will require approval from the Sustainable Drainage Approval Body (SAB) and as indicated on the indicative layout (Dwg no P01 and P02) features such as rainwater harvesting tanks and soakaways can be incorporated in the development, as referenced on the drainage strategy. These would provide the benefit of surface water attenuation, while also creating environmental enhancement features throughout the development. This indicative drainage arrangement would also form an appropriate drainage strategy to satisfy the requirements of TAN 15 (development, flooding and coastal erosion) Therefore, subject to the detailed approval from the Sustainable Drainage Approval Body, the proposal would provide a drainage strategy to comply with TAN 15 and the relevant requirements of policy GN.1. Further details are included in the supporting drainage statement.

5.55 Agricultural Land Classification (ALC)

ALC-outside flooding zone which forms a constraint to the settlement Section 3.59 from Planning Policy Wales states the below:

“When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade”

- 5.56 The below Agricultural Land Classification map from data map wales has classified the site as ‘3b’. As the agricultural land has a low classification Planning Policy Wales would support its development. Furthermore developing the site for agricultural purposes would not result in a direct loss of agricultural land as the buildings would facilitate an agricultural activity and support the

succession of the existig rural enterprise. Therefore the application would comply with the above policy context relating to Agricultural Land Classification.



Source: Data map wales

6 Conclusion

- 6.1 The development proposed would enable the farm to provide a modernised and efficient cow housing and covered feeding areas for the herd and followers, future-proofing the enterprise for years to come. The principle of development accords with national and local planning policies and the aims of the development satisfy the wider strategic objectives of the Welsh Government. The development would relate well to the existing complex and given the scale and character of the surrounding topography, the visual relationship of the development with the landscape would be acceptable. Furthermore, impacts upon biodiversity, the natural environment and the historic environment would be low based on the site area comprising of improved grassland. The scheme would accord with current best practice in terms of minimising slurry production, and the access arrangements are considered appropriate for the site and development. It is therefore considered that the development would accord with all relevant policies of the LDP and National Planning Policy and Guidance.