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18th August 2021

Planning Department
Swale Borough Council
Swale House
East Street
Sittingbourne
Kent
ME10 3HT



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Dear Sir or Madam,

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2017 - REQUEST FOR AN EIA SCREENING OPINION – PROPOSED
ERECTION OF ROOFS OVER 3 NO. EXISTING CATTLE YARDS AND 1 NO. SILAGE CLAMP
AT OLD RIDES FARM, LEYSDOWN ROAD, EASTCHURCH, SHEERNESS, ME12 4BD.**

I would like to request an EIA screening opinion for the proposed development described above. The proposed development has received pre application advice from Swale Borough Council under reference number 21/502844/PAPL.

Within the pre application advice response, the LPA suggest that the “The proposal would create an area of new floorspace exceeding 500 sq m for an intensive livestock installation and as such would exceed a threshold for the definition of “Schedule 2 Development” set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. If the proposal were to take the form of a planning application, I would advise that you should request an Environmental Impact Assessment Screening Opinion from the planning department”.

This EIA screening request has been made following the advice in the pre application advice report.

Project Description

The applicants operate a farming business at Old Rides Farm. The business farms 7600 acres, including 3600 of arable cropping and 4000 acres of grassland for grazing purposes.

The business operates a large herd of suckler cows extending to 800 breeding cows, plus calves and followers. The total headage of cattle is around 2,000 animals.

The cattle are used for grazing purposes as part of the management of local nature reserves, including the Elmley Nature Reserve and the Swale National Nature Reserve. The cattle herd grazes the nature reserves between April and January each year.

Youngstock graze the reserves from April until weaning in October, and the breeding cows graze on the reserves from April until January, when they are brought home to Old Rides Farm for the winter and the calving period. The herd calves between January and April.

The current cattle accommodation at Old Rides Farm is formed by outside cattle yards, as shown in the photographs below.





There are currently three large cattle yards at Old Rides Farm, which provide accommodation for the businesses 2000 cattle between October and April each year.

The external cattle yards have been functional for the purpose of accommodating the cattle in the winter for many years, however, the applicants now propose to improve the cattle facilities on the farm through erection of roofs over the cattle yards.

The purpose of the roofs is to improve the welfare of the livestock, reduce the volume of straw required for bedding of the cattle, and to reduce the significant volumes of dirty water produced from rainwater falling on the cattle pens.

Having a roof over all the cattle will make a substantial difference in the performance of the animal and the daily live-weight gain. Currently, the business has an average performance of 1.1kg/day weight gain.

With protecting the animals from the winter elements, cold, wet and windy weather their performance will increase from 1.1kg to approx. 1.5 – 1.6kg/day weight gain.

Thus, meaning instead of taking 24 month to finish a beef animal it will take 18 months, reducing the methane production and therefore the carbon footprint by 25%. The bedding will remain drier and therefore we will not produce as much farm yard manure, and in turn less greenhouse gases produced from spreading and incorporating farm yard manure.

As part of this proposal, the applicants also propose to erect a roof over the existing silage clamp on the farm in order to better protect the silage from the incursion of rainwater. A photograph of the existing silage clamp is shown below.



This proposal is large in scale, providing 25,540 sq m of new roof area. Despite the scale of the proposed development, it needs to be borne in mind that this development does not involve any new activity or any intensification of use of the site, and is purely based on the improvement of existing activities currently operating on the site.

Environmental Impact Assessment

Schedule 2 of the 2017 Regulations provides screening threshold for development in the table at paragraph 1. The table provides a threshold at 1(c) for Intensive Livestock Installations where the area of new floorspace exceeds 500 sq m.

In terms of the screening threshold in Schedule 2 of the 2017 Regulations, I would officer the following observations.

Firstly, I believe it necessary to explore as to whether Schedule 2 is relevant to this proposal. Schedule 2 relates to developments for intensive livestock installations, and my extensive experience, I would argue that winter housing for cattle in naturally ventilated straw yards is not an intensive livestock installation.

Intensive livestock installations are normally enclosed livestock systems, such as poultry or pigs where the animals are housed permanently, and the buildings have full controlled environments with automated ventilation, heating, feeding etc.

This proposal is for the construction of roofs over open straw cattle yards. The cattle yards are not for permanent housing of cattle, just for winter housing when ground conditions on the grazing land prevent grazing. The cattle yards are not subject to controlled environment systems, are naturally ventilated and straw bedded. There is a very clear and credible argument that this proposal is not an intensive livestock unit and therefore Schedule 2 doesn't apply.

Furthermore, this proposal does not introduce the livestock use to the site. The cattle enterprise is already in existence on the site, and this proposal just seeks to erect a roof over the existing external cattle yards. The purpose of the roofs is to improve the welfare of the livestock, reduce the volume of straw required for bedding of the cattle, and to reduce the significant volumes of dirty water produced from rainwater falling on the cattle pens.

It is the opinion of the applicants that the proposal is not EIA development for the reasons outlined above. I acknowledge that there are issues that require detailed information to be submitted as part of any planning application, such as Landscape and Visual Impact Assessment and Flood Risk and Surface Water Drainage Issues, however, these matters can be addressed in technical documents supporting a planning application, without the need for EIA.

Kind regards



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