



Claire Hall
Neath Port Talbot County Borough Council
The Quay
Brunel Way
Baglan Energy Park
Neath
SA11 2GG

13th July 2023

Dear Claire

Full Planning Application for the Erection of an Outbuilding to Store Poultry, Farm Equipment, Hay and 2x Biomass Boilers - Dream Fields, Llandarcy, Neath, SA10 6JU
Additional Justification Statement

Introduction

This covering letter has been prepared by Simply Planning Limited ('SPL') on behalf of our client, Mr Jonathan Hale ('the applicant') and is submitted in response to your e-mail dated 26th June 2023 (see **Document 1**). Within this e-mail the Council raised a concern about the principle of a new agricultural building at the application site.

The main comments raised within your e-mail were as follows:

"With regard to the boiler house development, you will be aware I have previously expressed concerns about the justification for this new building when there are existing stone barns that could be converted instead (subject to further consideration of their structural condition/survey etc.). Whilst I appreciate your client's desire to keep these for converting into living and/or tourism accommodation, you will be aware that the site is located within a Green Wedge (LDP Policy EN3) and I'm not satisfied that the new boiler house building is justified or essential in such circumstances."

This justification statement has been prepared to give additional evidence as to the need for additional agricultural building at the application site.

Policy Background

As outlined in our original submission, Policy EN3 (Green Wedges) of the LDP identifies that there is a presumption against inappropriate development in a Green Wedge, with the definition of 'inappropriate development' taken from Planning Policy Wales (edition 11) ('PPW11'). PPW11 confirms that justified rural enterprise needs should not be considered inappropriate within a Green Wedge.

Therefore, national planning policy supports justified agricultural development within a Green Wedge. National Planning Policy contains no definition in either PPW11 or Technical Advice Note 6: Planning for Sustainable Rural Communities (July 2010), as to what constitutes a justified rural enterprise need.

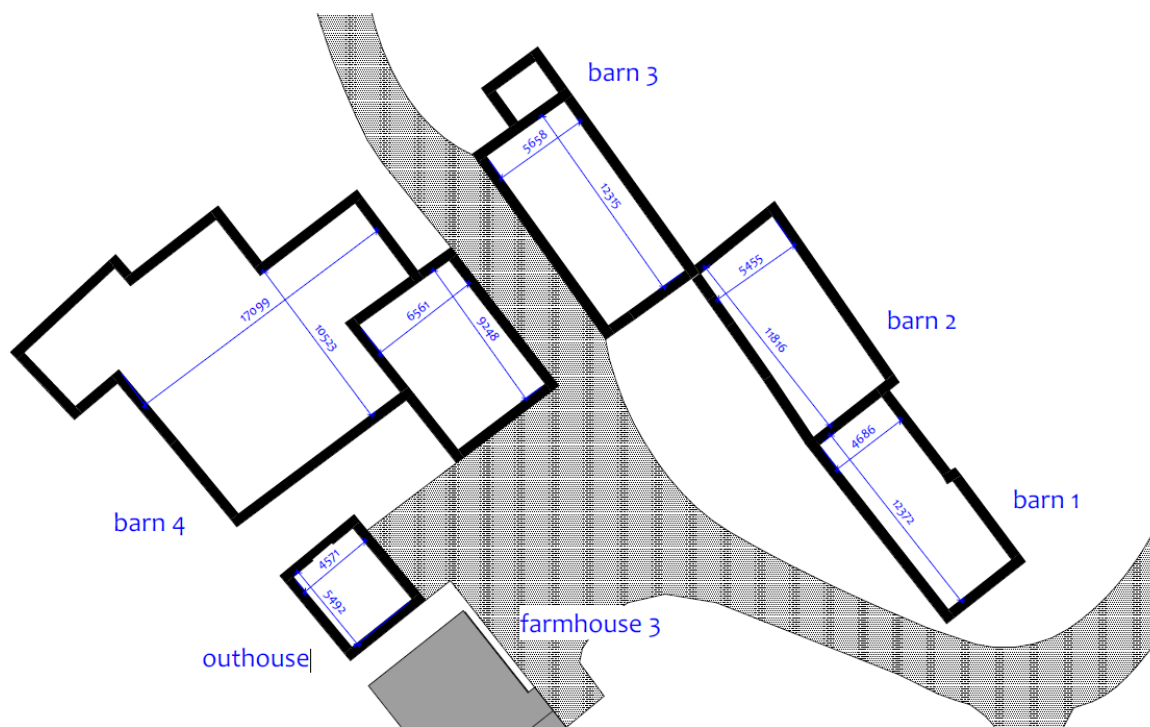
Whilst this application does not pertain to an application under prior approval for an agricultural building, the test laid out within the Town and Country Planning (General Permitted Development) Order 1995 (as amended), is that such a building should be 'reasonably required' for the purposes of agriculture.

Therefore, we would conclude that for the building to meet a justified rural enterprise need, it must be demonstrated that the building is reasonably required.

Material Considerations

Existing Stone Barns

The response from the Council to date has advised you consider the submission has not justified why a new building is required, given the existing stone barns within the site. Submitted in support of this statement is the Structural Survey prepared by CB3 Consult. This fully identifies and assess the condition of the existing stone barns within the site and we refer the Council back to this document for the full details. A plan showing the barns is provided below:



Plan of Barns within the Site

A summary of the stone barns are outlined as below. It should be noted that the elevations of the barn often have stepped building lines and the ground levels around the barns vary, so the below figures are the average measurements and will vary slightly depending on where the measurement is taken.

Barn 1:

Internal Measurements – Width 12.3m x Depth 4.67m – Internal Floor Area 57.44 sqm

Height to Eaves – 3.21m

The barn is rectangular in plan and the roof shape is duo-pitched and clad in slate with a gable end to the south elevation. The north elevation links onto a further barn, referred to as barn 2. The barn appears to have been used as a cow shed and stables. The ground level externally to the eastern elevation of the barn is approximately 1.5m

lower than the western elevation. The roof structure has collapsed over the southern half of the building, this appears to have been caused by a localised collapse of the eastern wall at eaves level.

Barn 2

Internal Measurements – Width 11.82m x Depth 5.46m – Internal Floor Area 64.53 sqm

Height to Eaves – 2.65m

The barn is rectangular in plan and the roof shape is duo-pitched with a gable ends to the north and south elevations. The south elevation links onto Unit 1 and the north elevation partially ties onto a further barn, referred to as Unit 3. The barn is single storey structure and appears to have been used as a milking parlour or cow shed. The roof is clad in corrugated steel sheets.

Barn 3

Internal Measurements – Width 12.32m x Depth 5.68m – Internal Floor Area 69.97 sqm

Height to Eaves – 4.481m

The barn is rectangular in plan and of double storey height. The gable ends to both elevations would suggest that the original roof shape was duo-pitched however the roof structure itself has either collapsed or was removed at some time in the past. The south elevation partially links onto Unit 2 and contains a door opening within the gable which would suggest that the barn originally had a 1st floor.

Barn 4

Barn was not assessed as part of the structural survey due to the ruinous condition of the building. Photos 28 to 40 in Appendix B of the Structural Survey provided a detailed photographic record of the barn and shows that the roof is totally missing and large sections of the elevations have also collapsed or are undermined. Therefore, we do not consider it possible that this barn could be redeveloped, without needing to be demolished and a new building erected.

Conclusions on Existing Barns

Based on the findings of the structural surveys, we consider that barns 1 to 3 could be repaired and put back into use. Barn 4 is beyond viable repair and would be required to be demolished and re-built to be used once more.

Requirement for a New Barn

The proposed barn would be used for variety of agricultural uses as well as the provision of the 2 x biomass boilers to serve the farmhouse. Outlined below is a detailed response why the existing stone barns, No.1 to 3, could not be re-used for the proposed purposes:

Need	Commentary
Storage of Agricultural Machinery	The main agricultural operation which is undertaken at the site is the production of hay. This requires a tractor and harvesting equipment which, given their size, require double height doors to be stored within a building.

Need	Commentary
	A 6M Short-Frame John Deere Tractor would have the following dimensions: Width – 2.25m Length – 4.33m Height – 2.76m Barn 2 has an eaves height that would not allow a suitable entrance door to accommodate even a short frame tractor. Likewise, the depth of barns 1 and 3 would not be sufficient for a tractor to enter the building and manoeuvre within the building for efficient storage purposes. The storage of agricultural equipment, would often be towed in and out of the building, so the footprint of barns 1 to 3 would not permit this, when being towed by a tractor. As the Council is aware, the existing farm has been subject to a number of thefts since the applicant took ownership. Therefore, a suitably secure building is required to ensure that the required agricultural equipment is protected from rural theft.
Provision of Biomass Boilers	Part of the building will be used to provide 2 x 95 kw biomass boilers, which are hand fed with clean wood pellets. These pellets are required to be delivered in bulk and stored away from the biomass boilers. As such additional storage space for the storage of the pellets is required. The pellets are delivered on pallets and so will require heavy machinery, such as a telehandler or tractor to manoeuvre the pellets into the building once they have been delivered to site. The size and scale of the existing stone barns are not sufficient to allow for the heavy machinery required to accommodate and store the pellets for the biomass boilers..
Storage of Hay	As outlined above, the key agricultural operation at the site is the production of hay. During the harvest season in 2022 a total of 120 large bales of hay were taken off the land. In 2023 this number of large bales has increased to 240, which is due to the applicant now having a full season of proper agricultural management of the farm, including fertilisation and clearance, which did not occur under the previous owner. This large bales of hay have been required to be moved to another agricultural holding for storage and drying, as the existing farm does not have a useable barn to accommodate this. Therefore, the barn will provide a suitable storage facility to allow for the hay to be dried, before this is then sold to other agricultural operations for use.
Poultry	The proposal also includes the provision of some chicken coops for poultry to be kept at the site. This would be primarily for the applicant's own benefit, although some eggs and chickens could be sold for revenue in future years. The existing barns are very close to the main farmhouse and the land around the buildings are at differing ground levels or form the parking / courtyard area for the farm complex. As such, the land around the building does not provide for an external area where the chickens are move between the coop and the enclosed outside area required for animal welfare.

Condition

The existing stone barns have been surveyed by CB3 Consult who have determined that the stone barns are structurally sound can be repaired, but they will require quite substantial investment to bring them back into use.

The applicant has asked a quantity surveyor to provide an initial assessment of the costs for the development of the new building, which they have considered to be between £300,000 to £350,000.

They also have provided a cost estimate for the restoration of the barns, including amendments to make them suitably sized to mirror the floorspace provided by the development. These costs are estimated to be between £450,000 to £500,000. Therefore, the costs for use of the existing barns would be approximately £150,000 more than the provision of a new building barn, or approximately 50% higher build cost.

The final intended use would be for agricultural use for the storage of farm equipment, hay, poultry and biomass boilers. As such, the use will be ancillary to the existing agricultural business at the site and would not result in a significant increase to any revenue to the agricultural operation. Given this, it is considered that it is not economically viable for an agricultural operation to restore the stone barns, when a far more cost effective means to provide the required space can be achieved through a new build development.

Summary and Conclusions

In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan, unless other material considerations indicate otherwise. The relevant development plan for the area is the Neath Port Talbot County Borough Council Local Development Plan 2011-2026 (LDP).

The Council have raised a concern with the proposed new barn, as it is considered that the existing stone barns could be repaired and used for agricultural purposes. The existing site benefits from four barns, with the structural survey showing that barn 4 is beyond repair and would require demolition and rebuilding.

The remaining three barns have depths of between 4.67m to 5.68m and so are not suitably sized for modern agricultural use. The narrow depth of the barns would not allow for tractors or telehandlers to enter the building and manoeuvre within it, meaning that the buildings are not fit for purpose. Such agricultural vehicles will routinely need to use the building for the storage and removal of hay and the delivery of the wooden pellets to fire the biomass boilers.

In addition, the costs of repairing and restoring the barns back into use would be substantially higher than the provision of a new building. The new barns will add little to the profitability of the agricultural operation, but is a necessity for its operation, now that this has been taken over by the applicant from the previous owner.

Paragraph 5.6.8 of PPW11 states that LPAs should adopt a constructive approach towards agricultural development proposals. We consider this justification statement has demonstrated why a new barn is reasonably required and why the existing stone barns are not fit for modern agricultural use.

We also consider that the location of the barn is necessary, as it will provide convenient access from the main agricultural fields within the farm holding and is the most practical location for the agricultural operation.

Therefore, we consider that the principle of a new barn is acceptable, for the reasons outlined within this statement.

Yours faithfully,



A handwritten signature in blue ink, appearing to read "Alex Smith".

Alex Smith

Director



Dream Fields, Llandarcy, Neath, SA10 6JU

Additional Justification Statement

Document 1

Neath Port Talbot Council E-mail dated 26th June
2023

Alex Smith

From: Claire Hall <c.hall@npt.gov.uk>
Sent: 26 June 2023 16:40
To: Alex Smith
Cc: Josh Downey
Subject: RE: NPTCBC Planning Consultation - P2023/0356 Sun Fields Dream Fields

Good afternoon Alex, thank you for this update. I look forward to receipt of the retrospective access application and DOC applications for Tennant Grove from you imminently, and the ALC survey report and supporting evidence/justification for developing the solar farm on this site in due course.

Consultation responses are slowly coming in for the solar farm but a number are still outstanding so I will revert again once I've chased the important missing ones. Our ecologist is maintaining an objection until the required follow-up survey(s) – as well as sufficient information for us to complete the required HRA assessment - have been submitted to our satisfaction. Please can you provide an update as to when this information can be expected (you previously advised the walk over was arranged for 20 June)? Please note we have had to outsource a Landscape Architect to look at the submission on NPTCBC's behalf from a landscape impact perspective (as we have no in-house expertise in this regard) and I will revert again on receipt of their comments on the submission.

With regard to the boiler house development, you will be aware I have previously expressed concerns about the justification for this new building when there are existing stone barns that could be converted instead (subject to further consideration of their structural condition/survey etc.). Whilst I appreciate your client's desire to keep these for converting into living and/or tourism accommodation, you will be aware that the site is located within a Green Wedge (LDP Policy EN3) and I'm not satisfied that the new boiler house building is justified or essential in such circumstances. You may wish to provide additional/stronger evidence for us to consider in this regard. I am also concerned about the somewhat industrial appearance of the building, it being entirely metal in its walls and roof, as opposed to e.g. a more traditional Yorkshire boarding or similar agricultural style of building.

In light of these comments, if you do not wish to proceed to commission the additional information required to support a HRA for the boiler house (although it appears to me you would have to commission someone to do the equivalent for the solar farm development anyway?) then please let me know by return so I can proceed to a determination stage. Otherwise I shall assume that an extension of time for you to provide a response is agreeable to you?

I trust this information is of assistance and look forward to hearing from you in due course.

Kind regards

Claire Hall

Senior Planner – Uwch Cynllunydd
Neath Port Talbot County Borough Council/ Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot Tel/Ffôn: 01639 686727

Email / E-bost: c.hall@npt.gov.uk

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Os hoffech ddefnyddio'r Gymraeg wrth ddelio â'r Cyngor os gwelwch yn dda cliciwch [yma](#)