



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

13th March 2024

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
Alternative Site Sequential Search

Introduction

This letter has been prepared by Simply Planning Limited ('SPL') on behalf of our client, Mr Jonathan Hale ('the applicant') and is to address your previously raised concerns as to the proposed siting of the barn in application reference P2023/0182.

This letter should be read in conjunction with the following previous submissions relating to the size and siting of the barn:

- 13th July 2023 – Justification Statement on inability to re-use Existing Barns;
- 23rd August 2023 – Agricultural Questionnaire. Completion of the Council's agricultural questionnaire to explain the farming operation and the need for the barn;
- 24th January 2024 – Levels Plan and covering e-mail, explaining why the barn could not be sited where the existing stone barn which has failed; and
- 30th January 2024 – Revised floor plans showing the equipment proposed to be stored within the barn and the photographs of the equipment.

Following the above submissions the Council have continued to raise a concern in relation to the siting of the barn. Therefore, this document has been prepared to assess alternative locations and why they are not suitable for the proposed barn.

Material Considerations

The proposed development seeks the erection of a new barn to be located approximately 50m north of the existing cluster of farmhouses and farm buildings. The location of the proposed barn was selected for a number of reasons, which were as follows:

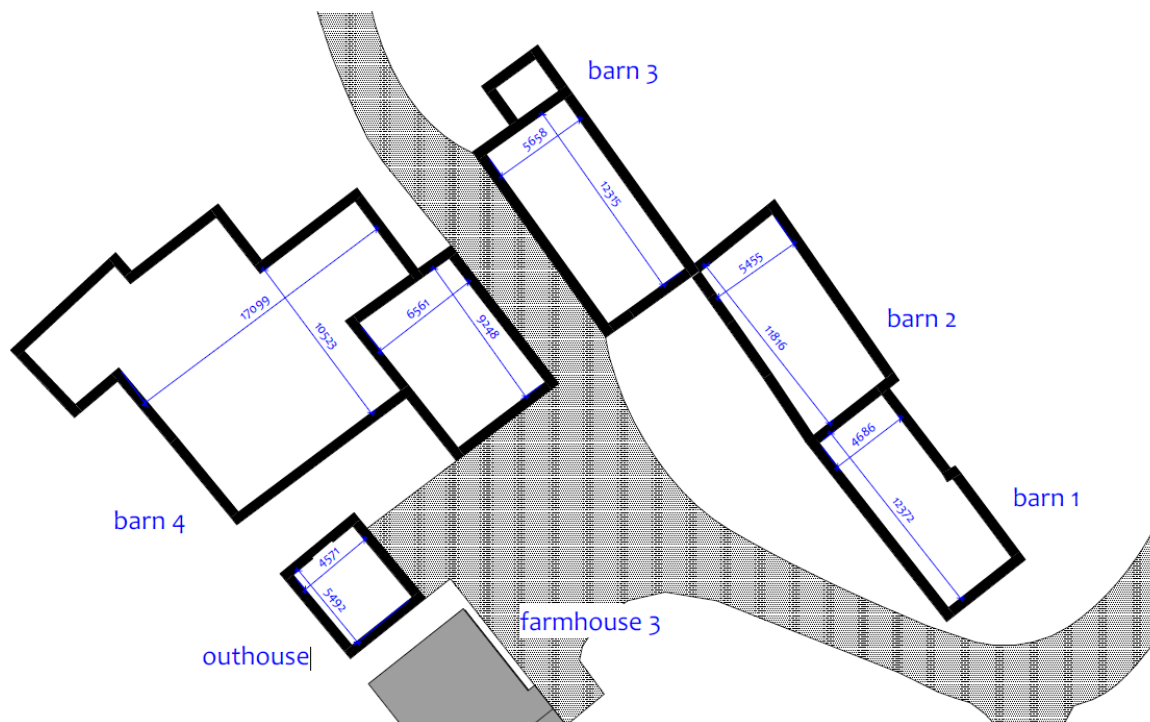
- Site Levels – This parcel of land is the closest to the existing farm buildings which benefits from land flat enough to develop a barn large enough for modern agriculture that would not entail significant ground level alterations.
- Chicken-Coops – The proposed building will provide chicken coops for the storage of approximately 50 – 100 chickens. Therefore, the building has been kept away from the existing residential properties, due to noise and odour disturbance which might arise. This location also allows for chicken runs to be provided on the field adjoining the building; and
- Biomass Boilers – The proposed barn will also house biomass boilers and this location is downwind of the prevailing wind direction, ensuring any smoke arising will generally emit away from the residential properties.

For these reasons the applicant has selected the proposed location for the new barn. The Council have raised a concern in relation to this location, due to a concern about landscape impacts from the building being set away from the existing cluster of farm buildings.

As such, despite a sequential search for a site with less landscape harm not being a policy requirement of any local or national planning policy for developments of this size, we consider the alternatives in closer detail below.

Option A – Demolition of Existing Stone Barn that is Beyond Viable Repair

The closet barn to the farmhouse is located to the north and is identified as Barn 4 below. The previously submitted structural survey shows this building cannot be saved and so this location would be the Council's preference to minimise landscape harm.



Plan of Barns within the Site

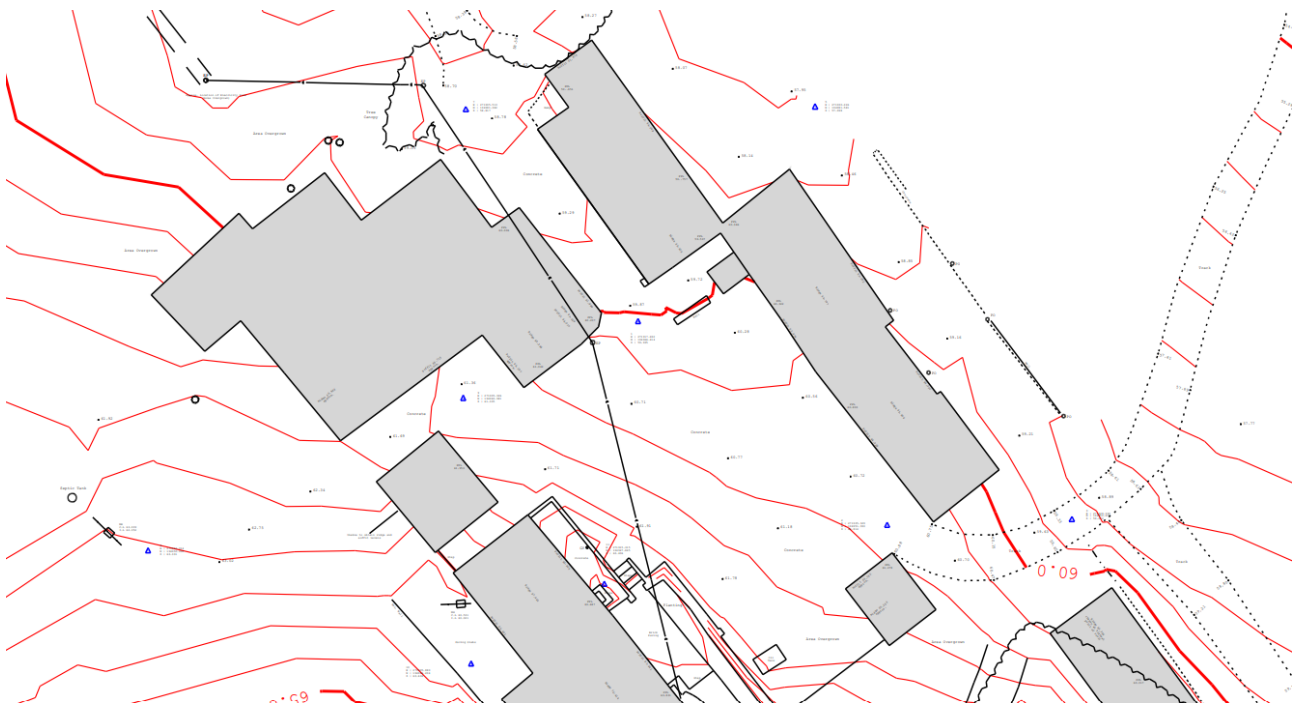
In our submissions dated 24th January 2024, we have already identified the grounds why a replacement barn cannot be located in this position. The primary reason, as with most of the area around the existing farmstead, is due to the steeply sloping levels meaning large retaining walls would be required, which themselves would be greatly damaging to the landscape. In addition, the position is considered too close for chicken coops, due to odour and noise disturbance and inability to provide a chicken run.

Option B – Demolition of Existing Stone Barn that can be Retained

The second option is the demolition of the range of stone barns, identified as barns 1, 2 & 3 above, and erection of a replacement barn.

The structural survey has shown that these stone barns can be viably saved and remain structurally sound. Therefore, the demolition of these barns is considered a more harmful option than the proposed for the following reasons:

- Site Levels – Again the sloped levels would not allow a new barn to be development without significant retaining structures, as can be seen on the below topographical survey and can be seen on site:



- Loss of the Historic Farm Complex Layout – The demolition of this range of barns would lose the historic context of the farmstead, so an option that would avoid this is considered preferential from a heritage perspective;
- Ecology – Bat surveys have been completed for the area for the future replacement of the farmhouses in a future planning application. This has shown bats are using these barns and so it would involve the loss of a protected species habitat; and
- Proximity to Farmhouses – the position is considered too close for chicken coops, due to odour and noise disturbance and inability to provide a chicken run.

Option C – A Position Closer to the Farmstead than Currently Proposed

Given the arrangement of the field parcels and access track, the proposed location is currently as close as the proposed building can be sited in the northerly direction to the existing farmstead without the loss of hedgerows. Therefore, the alternative directions are considered below.

Option C (i) – Land West of the Farmstead

The below information is taken from the topographical survey and shows that the levels increase steeply to the rear of the farmhouses. Therefore, any new building in this location would sit higher in the landscape than the existing farmstead and so would cause more impact to the landscape than the currently proposed location.



In addition, the flattest area of land to the west of the farmstead is where an existing pond is located and so a new building could not be erected in this location due to the existence of the pond.

Option C (ii) – Land South of the Farmstead

The land to the south of the farmstead is also very sloped and, again, a new building could not be erected without causing more impact to the landscape than the location currently proposed.

Option C (ii) – Land North-East of the Farmstead

The final option would be to locate a barn to the north-east of the existing farmstead. The topographical study does not pick up the levels in this land, but as it follows the line of the road it runs downhill at a steep gradient away from the site. Therefore, this area is also not suitable for development of a new agricultural building.

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 concerned about the landscape impacts of the agricultural building in the proposed location.

Through our submissions to date we believe we have evidenced that a 129-acre agricultural holding with no useable agricultural buildings suitable for modern agriculture has met the threshold of demonstrating why a barn of this size is reasonably required.

We have also addressed in our original submission that such a building would not form inappropriate development within a Green Wedge and would be acceptable under national planning policy.

Whilst we acknowledge the Council's reservations about the barn being separated from the former farmstead, the 50m gap between the building is not uncommon on modern agricultural farms. As highlighted in this submission we consider the location is the closest which can be sequentially achieved, given the ground levels of the site which cannot be overcome for an agricultural barn without substantial retaining walls being erected, which in themselves would be far more harmful to the landscape than the gap between being proposed.

Paragraph 5.6.8 of PPW12 states that LPAs should adopt a constructive approach towards agricultural development proposals. We consider this assessment, along with the significant evidence provided to date has demonstrated why the proposed development is reasonably required for the purposes of agriculture and why the intended location is both the most sequentially preferable and best for the future use by the agricultural operation.

Therefore, we consider that the proposed new barn is acceptable and in accordance with both local and national planning policy, for the reasons outlined within this statement and the information and evidence submitted before it to date.

Yours faithfully,

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

Alex Smith

Director