
Planning Statement

**Land formerly of Meadowsweet
Farm,
Trelewis,
Treharris,
CF46 6TB**

**Erection of an extension to an
existing agricultural building**

Mr Rees

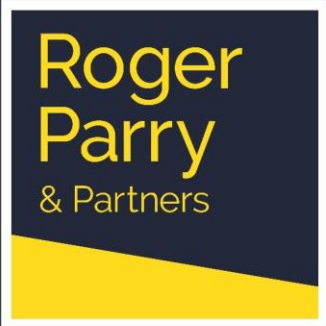
November 2024

Roger Parry & Partners LLP

www.rogerparry.net

mail@rogerparry.net

Tel: 01691 655334

The logo for Roger Parry & Partners is located in the bottom left corner. It consists of a white square containing the text "Roger Parry" in a large, bold, yellow sans-serif font, with "& Partners" in a smaller, yellow sans-serif font below it. The square is set against a dark blue background that features a yellow diagonal stripe running from the top left towards the bottom right.

**Roger
Parry**
& Partners

Contents

Contents	i
1.0 Introduction	1
2.0 The Site.....	2
3.0 The Proposed Development	3
4.0 Planning Policy Context	4
5.0 Principle of Development	4
6.0 Design, Landscape & Visual Impact	7
7.0 Impact upon Neighbours.....	9
8.0 Highways	10
9.0 Ecology & Biodiversity	10
10.0 Minerals Safeguarding	11
11.0 Conclusion	11

Author: Gwyn Humphreys BSc (Hons) AssocRTPI

Reviewed by: Rosina Riddle BSc (Hons) MRICS

Publication Title: Planning Statement

Version: 1.0

Date: November 2024

Roger Parry & Partners LLP
9 Mercian House
Darwin Court
Oxon Business Park
Shrewsbury
SY3 5AL

Tel: 01691 655334
01743 791336

gwyn@rogerparry.net
www.rogerparry.net

Ref: 79347

1.0 Introduction

1.1 This Planning Statement is prepared and submitted in connection with a full planning application made to Merthyr Tydfil County Borough Council (“The Local Planning Authority”) for the construction of an extension to an existing agricultural storage building, to be used primarily for the housing of livestock at Land Formerly of Meadowsweet Farm, Trelewis, Treharris, CF46 6TB.

1.2 The description of development is:

Erection of an extension to an existing agricultural building.

1.3 This Planning Statement should be read in-conjunction with the other documents and drawings which have been submitted in support of the application, principally comprising:

- Completed Full Planning Application Form
- Green Infrastructure Statement
- Dwg No: 79347 / GH / 001 – Site Location Plan
- Dwg No: 79347 / GH / 002 – Existing Block Plan
- Dwg No: 79347 / GH / 003 – Proposed Block Plan
- Dwg No: 79347 / GH / 100 – Proposed Floor Plan
- Dwg No: 79347 / GH / 101 – Proposed Elevations
- Dwg No: 79347 / GH / 004 – Proposed Biodiversity Enhancement Plan

1.4 The information contained within this statement and the documents listed above provides a comprehensive assessment of the proposal and confirms that the development can be delivered without giving rise to any unacceptable impacts in planning terms.

1.5 This Planning Statement is designed to aid the Planning Officer in making their recommendation.

1.6 It is noted this application is a resubmission of planning application ref: P/23/0180 which was refused in March 2024. The previous full planning application was refused for the following reasons:

1. *It has not been demonstrated that the proposed development at the scale and design proposed is reasonably necessary for the purposes of the agriculture. As such, due to its size and height, it represents an unjustified, intrusive development which would have a harmful impact on the visual amenities of the open countryside. The proposal is therefore contrary to policies SW4 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan”.*

2. *The proposed extension, by virtue of its prominent siting, design, scale and height, would form a discordant and intrusive feature within the open landscape and would cause harm to the character and quality of the Special Landscape Area. As such, the proposal is contrary to Policies SW11 and EnW5 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.*
3. *The applicant has failed to provide a Preliminary Roost Assessment (PRA) of the existing building and adjacent Oak Tree. As such, the impact of the proposal on bats and nesting birds have not been fully assessed. The Local Planning Authority is therefore unable to determine whether there would be any adverse impact or the need for and extent of any mitigation. The proposed development is therefore contrary to Policies EnW1 and EnW2 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.*

1.7 This application seeks to overcome the previous reasons for refusal given by the LPA.

1.8 Also of note are two recently submitted Agricultural Prior Notifications (references: P/24/0195 and P/24/0222) which were also refused by the LPA.

2.0 The Site

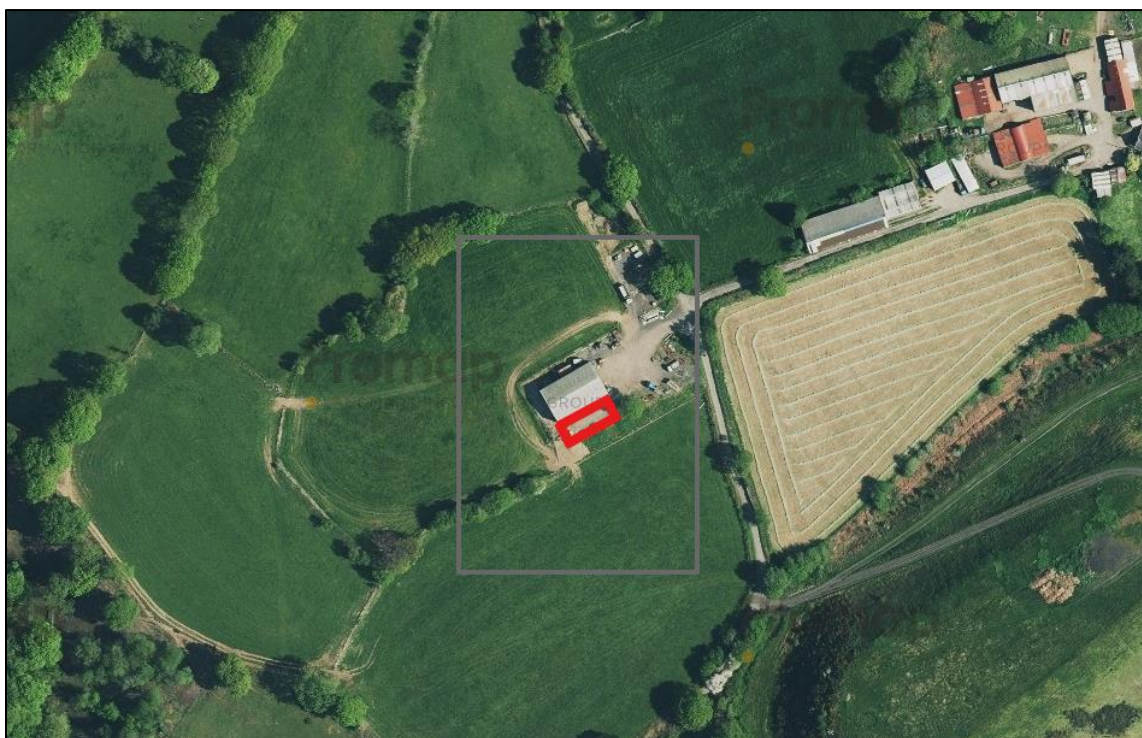
2.1 The application site comprises approximately 0.03 hectares of agricultural land located adjacent to an existing agricultural building on the holding. The wider owned holding has an area of approximately 8 hectares, although a further 41 hectares of agricultural land is currently leased by the Applicant as part of their agricultural operations.

2.2 The site is accessed off Cwmcothi Road and benefits from an existing vehicular access with good levels of visibility.

2.3 The application site is located outside of a defined settlement boundary as per the adopted Merthyr Replacement LDP (January 2020) and therefore for the purposes of this application is considered to be located within the open countryside.

2.4 The application site is located within the Gelligaer and Taf Bargoed Special Landscape Area (SLA) as per Policy EnW5 of the LDP.

2.5 An aerial view of the application site and its immediate context is provided below for illustrative purposes:



3.0 The Proposed Development

3.1 The application seeks full planning permission for the erection of an extension to the existing agricultural storage building on the site.

3.2 The proposed extension would measure approximately 12m in width and 24m in length; having a resultant floor area of approximately 288sqm. It would have a dual-pitched roof (to match the existing) with an eaves height of approximately 4m and a height to the ridge of approximately 5.8m. The proposed extension would be finished externally with concrete lower walls, vented box profile cladding (coloured Juniper Green) above, and a grey fibre cement sheet roof with a ventilated ridge.

3.3 As noted, the proposal would comprise an extension to the existing building on-site; which is designed and used for agricultural storage purposes only – providing under-cover storage for agricultural machinery and implements used in the upkeep of the land and the harvest of hay/silage fed to the livestock during winter months. It is also used to store fodder, feed, hay and straw used by the livestock. It is essential that these products are stored under cover to prevent decay and waste due to wet weather.

3.4 The proposed extension would be used primarily for the housing of the Applicant's livestock (sheep) during the winter and spring months when the sheep are due to lamb. However, it would also have a wider agricultural purpose depending on the needs of the enterprise at that time. Indeed, the building would be used for general sheep work in late spring, summer and

autumn months, to include regular vaccinations, drenching, and docking of ewes and lambs. The building would also be used for shearing of the ewes and ewe lambs each summer, to help prevent parasites affecting the flock. The building would also be used to sort out lambs from their mothers during weaning, as well as sorting lambs to be sent to the livestock market or abattoir once ready for the consumer. This list of intended uses is not exhaustive however – when not in use for lambing during the winter and spring months, the proposed extension would have a general-purpose agricultural use.

4.0 Planning Policy Context

- 4.1 Planning Policy Wales (Edition 12, 2024) advises at Paragraph 5.6.8 that ***“Planning authorities should adopt a constructive approach towards agricultural development proposals, especially those which are designed to meet the needs of changing farming practices or are necessary to achieve compliance with new environmental, hygiene or welfare legislation”***.
- 4.2 Technical Advice Note 6 (Planning for Sustainable Rural Communities) also sets out the Welsh Government’s support for agricultural development proposals owing to the positive impact they can have upon the rural economy and rural communities.
- 4.3 It is noted there are no specific policies contained within the adopted Merthyr Replacement LDP concerning new agricultural development proposals. However, Policy SW4 (Settlement Boundaries) does confirm that agricultural development proposals are one of few permissible types of new development within the open countryside.
- 4.4 Paragraph 6.4.30 of the Replacement LDP also confirms support for agricultural development within the open countryside, stating:

“Whilst recognising the general presumption of protection of the Countryside, we also understand that a working countryside can provide a thriving and diverse local economy where agriculture-related activities are complemented by sustainable tourism and other forms of economic development”.

5.0 Principle of Development

- 5.1 As already noted within this Planning Statement, the application site lies within the open countryside in planning terms, and therefore the proposal comprises a form of ‘Countryside Development’. However, as the development comprises a form of agricultural development, the principle is supported by Policy SW4 of the Replacement LDP in this location.

- 5.2 The Applicant owns approximately 8 hectares of agricultural land on-site, and rents a further 41 hectares in total within the locality. The agricultural operations involve the farming of this land, and the farming of approximately 255 head of sheep/breeding ewes, together with their lambs each year.
- 5.3 At present, the only building in-use by the Applicant as part of their agricultural enterprise is the existing agricultural storage building located adjacent to the application site.
- 5.4 The existing building is already fully utilised to store agricultural machinery and implements used in the upkeep of the land and the harvest of hay/silage fed to the livestock during winter months. It is also used to store fodder, feed, hay and straw used by the livestock. It is essential that these products are stored under cover to prevent decay and waste due to wet weather.
- 5.5 Machinery/implements stored within the existing building include 2 tractors, a baler, wrapper, topper, mower, rake, harrow, round and square bale grabs, several trailers (stock and non-stock), a post-knocker, a quad bike and a digger. The building is also used to store all equipment associated with the agricultural enterprise including feed troughs, hay feeders, silage feed rings, creep feeders, a sheep docking crate and hurdles. As noted, the building is also used to store all of the feed/fodder, hay and straw used by the livestock (except for baled silage which is stored outdoors). It is imperative that these feedstuffs and bedding are kept indoors and under cover to avoid wastage and a degradation in feed quality.
- 5.6 The issue of security is also an important consideration – the Applicant’s machinery and equipment is worth a considerable amount of money and therefore for reasons of avoiding theft, it is essential that they are stored securely within the existing building.
- 5.7 The existing building is not suitable for use by livestock; being designed for storage purposes only. Indeed, it does not have features which would enable sufficient ventilation within the building, and as such cannot be used to house sheep (or any other livestock for that matter) for any extended period of time.
- 5.8 The proposed extension would be primarily used for the housing of livestock, particularly during the winter and spring months. As noted, the Applicant farms approximately 255 head of sheep, along with their lambs each year, and it is imperative for animal welfare reasons, as well as to minimise the loss of newborn lambs, that the in-lamb ewes are housed indoors during winter and spring months. The Applicant presently does not own or have use of a building suitable for the housing of sheep for extended periods of time.
- 5.9 The Applicant would generally look to bring the in-lamb ewes into the extension in December/January time, and they would be housed indoors until

they have lambed and the ewes and lambs are ready to be released into the outdoors in the late spring (weather dependent).

- 5.10 Generally the Applicant would look to lamb the ewes in two separate batches each year – the first in December/January and the second in March/April. Depending on the weather conditions at the time, and the extent of grass available in the fields (again largely owing to weather conditions) the ewes and lambs could be housed indoors for an extended period of time – making clear the need for the proposed modestly scaled extension.
- 5.11 The UK (and Wales in particular) is now facing wetter and more extreme winters owing to the impacts of climate change. This poses significant issues for livestock farmers who don't benefit from sufficient levels of livestock housing, as the fields become extremely wet, boggy and muddy, and this inevitably leads to the unnecessary loss of newborn lambs; thus impacting upon the viability of the enterprise. Not only do the wet weather conditions mean newborn lambs are inevitably lost where a suitable livestock building is not available, but due to the saturation of the ground and the creation of boggy and muddy conditions, even when the weather does improve, grass growth is significantly hindered, which consequently impacts upon the growth of the lambs going forwards.
- 5.12 The proposed extension is considered to be the minimum sized building needed to adequately provide winter housing for the Applicant's sheep flock, when considering the need for individual sheep pens for ewes with newly-born lambs.
- 5.13 Within the LPA's Delegated Report for application ref: P/24/0222 the Planning Officer noted that the breed of sheep farmed by the Applicant had not been confirmed within the application documentation. It is confirmed that the Applicant currently farms a mixed commercial flock comprising of primarily Texel but also Lleyen ewes. However, it is also important to acknowledge that farming practices need to constantly evolve and change, and therefore it is not uncommon for breeds to be changed relatively regularly, and this could not be controlled as part of the planning system.
- 5.14 The height of the extension as proposed is also needed to ensure access can be gained with a tractor for the purposes of cleaning out the building routinely. To lower the eaves height of the extension would compromise the ability of the Applicant to enter the building with a modern tractor, and therefore a build-up of manure, straw etc on the building's floor would be inevitable.
- 5.15 The proposed extension has been designed specifically to meet the needs of the enterprise; being open-sided on the eastern elevation, and using ventilated box profile sheeting on the other sides to ensure air flow through the building. Such a design helps to reduce cold winds travelling through the building (compared to alternative designs using timber Yorkshire boarding for

example) whilst also ensuring sufficient ventilation exists to help prevent medical conditions amongst the sheep such as pneumonia.

- 5.16 When not in use for lambing, the proposed extension would be used for general agricultural purposes depending on the needs of the enterprise at that time. Indeed, the building would be used for general sheep work in late spring, summer and autumn months, to include regular vaccinations, drenching, and docking of ewes and lambs. The building would also be used for shearing of the ewes and ewe lambs each summer, to help prevent parasites affecting the flock. The building would also be used to sort out lambs from their mothers during weaning, as well as sorting lambs to be sent to the livestock market or abattoir once ready for the consumer.
- 5.17 It is noted that the Planning Officer's delegated report for application ref: P/24/0222 stated: *"The local planning authority are not opposed to the principle of another building or extension to benefit the agricultural needs of the applicant. However, it must be demonstrated that it is reasonably necessary and suitably designed, particularly given the potential harmful impact on the character of the landscape and the character and quality of the Gelligaer and Taf Bargoed Special Landscape Area"*.
- 5.18 Whilst the design and visual impact of the development will be addressed in greater detail below, it is considered that the principle of development has been fully and sufficiently justified on this occasion in-line with the needs of the agricultural enterprise.
- 5.19 In light of the above, the proposal is clearly required for the purposes of agriculture, and the development is therefore considered to be acceptable in principle in this location.

6.0 Design, Landscape & Visual Impact

6.1 As noted, the application site is located within the open countryside in planning terms and is also located within the Gelligaer and Taf Bargoed SLA as per Policy EnW5 of the Replacement LDP. Within SLAs, Policy EnW5 advises:

"Development proposals will be permitted where it can be satisfactorily demonstrated that:

- a) It would not cause unacceptable harm to the character and quality of the landscape setting of the County Borough;*
- b) Development within Special Landscape Areas are sensitive to their special characteristics;*
- c) Development respects the local distinctiveness and historic character of the landscape;*
- d) Development will safeguard local landscape character and landscape features, including views, which make a significant contribution to the character, history and setting of the locality;*

- e) *Development secures the enhancement of the character, appearance and quality of the landscape, through restoration, management or enhancement where possible;*
- f) *There is no satisfactory alternative and the benefits associated with the development can be demonstrated to outweigh the harm; and*
- g) *Where damage to local landscape character cannot be avoided appropriate mitigation has been secured”.*

6.2 Paragraph 6.6.42 of the Replacement LDP adds that: *“these designations are not intended to prevent development but to ensure that, where development is acceptable, careful consideration is given to the design and scale of the development including siting, orientation, layout and landscaping and the special qualities and characteristics for which the SLAs have been designated are protected”.*

6.3 In terms of NRW’s LANDMAP, the application site and its surroundings lies within the Cwm Cothi Farmlands aspect area. A visual and sensory evaluation of the application site and its surroundings using LANDMAP confirms the land to be of overall moderate quality. The aspect area summary description reads:

“The south end of the ridge between the Taf and Taf Bargod is at a slightly lower altitude than Merthyr Common and has all been enclosed. The Nant Cothi flows southeast out of this area and has formed a distinct bowl which belongs to neither the Taf or Taf Bargod. Slopes are less steep than those along the sides of the main valleys. The farmed landscapes in Cwm Cothi form a mosaic of stream side woodlands and hedged pasture giving way to stone walls at higher levels. Areas of conifers overlay the field pattern to the west joining onto the plantations in the Taf valley. The area feels remote but contained and settlement is limited to a few isolated farmsteads linked by tracks. It is not as exposed as the Common or the main valley sides”.

6.4 The application site is noted to be located within a largely rural landscape, although in very close proximity to built-up urban areas. The immediate environs are largely comprised of relatively small blocks of pastureland enclosed by hedgerows and trees, interspersed with relatively small farmsteads and farmhouses.

6.5 The existing building on the site, and the wider site itself, is plainly visible from the public highway, and it is noted the existing building is of a relatively large scale; however the scale and visual impact of the existing building has previously been justified in agricultural terms – with the LPA accepting this justification in approving the planning permission for the existing building.

6.6 The proposal now before the LPA is for a modestly-scaled and subservient extension of the existing building to provide an area to predominately house livestock.

6.7 Indeed, its scale has been reduced significantly compared to the design proposed as part of planning application reference P/23/0180. Its eaves and ridge heights would now be lower than the host building and its width similarly reduced in scale compared to the previously refused full planning application. The result is that the proposal would now form a suitably scaled and subservient addition to the existing building.

6.8 The proposed extension has also been suitably designed so as to be in-keeping with the existing building and so as to reduce its landscape visual impact. It would be finished externally with concrete lower walls, vented box profile cladding (coloured Juniper Green) above, and a grey fibre cement sheet roof with a ventilated ridge. Thus, the extension would be finished with a muted environmental colour which would reduce its prominence and visibility within the host landscape and would match the existing building on-site.

6.9 Owing to its subservient scale and appropriate external design, the proposed extension would be read against the backdrop of the existing building on the site when viewed within the wider host landscape. It would not form an isolated or sporadic form of development within the open countryside, but would instead simply extend the existing building which already benefits from full planning permission.

6.10 As the application proposes additional operational development, it is acknowledged that the proposal would have a visual impact; although as assessed above it is considered the visual impact would be acceptable in this instance. In any case, as per dwg no: 79347 / GH / 004, additional soft landscaping in the form of native species tree and hedgerow planting is proposed along the application site's southern boundary. The proposed planting would extend the existing hedgerow and row of trees in an easterly direction and would help to screen the existing and proposed development on-site from public view to the south and south-east; ensuring the wider building would be assimilated into the landscape setting.

6.11 Owing to the above factors, it is clear the proposed development would not cause any unacceptable or harmful impacts upon the qualities of the host landscape on this occasion, particularly due to the proposed additional native species soft landscape planting.

7.0 Impact upon Neighbours

7.1 The closest residential property to the application site lies approximately 240m to the east, at Ty Newydd Farm.

7.2 In light of the scale and nature of the proposal, together with the significant separation distance to the closest neighbouring dwelling house, there is no

potential for the development as proposed to impact upon the amenity of neighbouring residential occupiers in this instance.

7.3 Thus, it is considered there are no negative impacts upon neighbouring residential amenity and privacy associated with the development.

8.0 Highways

8.1 As noted, the application site benefits from an existing access onto the unclassified public highway (Cwmcothi Road). No improvements to the existing access are proposed as part of this planning application as it already benefits from adequate visibility and width and the proposed development would not increase the number or indeed intensity of vehicle movements to/from the application site within the local highway network.

8.2 Therefore, the application as submitted is acceptable with regards its impacts upon highway safety within the site's vicinity.

9.0 Ecology & Biodiversity

9.1 At the time of the submission of the planning application, the application site comprises an area of existing hardcore which is devoid of any ecology, habitat or green infrastructure.

9.2 Whilst the proposal would be attached to an existing building on-site, owing to the age and modern design of the existing building, it would not provide any suitable features for bats or nesting birds. Thus, the proposal would not have the potential to cause any impacts upon protected species.

9.3 It is acknowledged that a mature Oak tree previously existed to the south of the application site, however this has since been removed in-line with the recommendations of a qualified Arboriculturist. The removal of the Oak did not require any prior permission from the Local Planning Authority given it was not subject to a Tree Preservation Order (TPO) and was not sited within a conservation area.

9.4 However, in-line with the requirements of Planning Policy Wales (Chapter 6) as a tree has recently been lost, replacement tree planting is proposed (as shown on dwg no: 79347 / GH / 004 to mitigate for the loss. The proposed level of tree and hedgerow planting proposed and shown on dwg no: 79347 / GH / 004 would not only mitigate for the loss of the former Oak but would also provide a net benefit for biodiversity over and above the site's green infrastructure baseline.

9.5 Please also refer to the Green Infrastructure Statement submitted in support of the application with regards to green infrastructure and net benefits for biodiversity.

10.0 Minerals Safeguarding

10.1 The application site is located within a Sandstone Safeguarding Area as per the Replacement LDP. Therefore Policy EcW13 is of relevance.

10.2 In theory, if the demand was there, the mineral resources on-site could be extracted prior to the proposed development commencing. Furthermore, even if the proposed extension was constructed, the development would not necessarily mean the mineral resources on-site would be sterilised.

10.3 Therefore, the requirements of Replacement LDP Policy EcW13 have been met.

11.0 Conclusion

11.1 This Planning Statement provides a balanced assessment in planning terms of the proposed development comprising an extension of the existing agricultural building on-site.

11.2 As has been demonstrated throughout this statement, the development is clearly compliant with the requirements of both local and national planning policy, and it positively responds to the site's constraints.

11.3 The development would allow a modest expansion of the existing agricultural storage building on the site, providing suitable livestock housing for the Applicant to utilise as part of their agricultural enterprise. As has been made clear, there is strong policy support for suitable agricultural development proposals at both a local and a national level.

11.4 The development would not cause any unacceptable impacts upon the qualities of the host landscape, and has been suitably designed so as to be in-keeping with the character of the existing building and site. The proposal would also not cause any adverse impacts with regards neighbouring amenity, highway safety, ecology and green infrastructure, nor the safeguarding of mineral resources.

11.5 In light of the above, the development is acceptable in planning terms, and it is therefore respectfully requested that full planning permission be granted. However, should the LPA require any further information to be submitted, the

Applicant politely requests that they be invited into discussions in order for an agreeable outcome to be reached.