

**BRIAN GRIFFIN PLANNING
& COUNTRYSIDE CONSULTANTS LIMITED**

The Cottage, Green Bottom, Littledean
Gloucestershire GL14 3LH

Tel. 01594 829900
E-mail. btgriffin@myfwi.co.uk
Reference: 535Marshallsea7
Date: 27 July 2022

Merthyr Tydfill CBC
Town Planning DC
Unit 5 Triangle Business Park
Pentrebach
Merthyr Tydfill
CF48 4TQ

**Temporary Rural Worker's Dwelling (3 years) with Dependent Relative's annex.
Erection of Agricultural Building and associated works. Pencoedcae Farm
Cwmblocks Merthyr Tydfill CF48 4AJ. Rhoswen Marshallsea**

This is a full application for a temporary rural worker's dwelling with a dependent relative's annex on behalf of Rhoswen Marshallsea. Rhoswen lives at Heolgerrig and the farmstead is at Pencoedcae, Cwm Blacks.

The on line application comprises:

Application form and certificate

Application fee of £462

Plan PF10A Site Plan

Plan PF20A Layout Plan

Plan LC10 Layout & Elevations of Log Cabin

Plan RM10 Layout and Elevations of farm building

Planning statement and appraisal of need.

Coal Report

Rightmove Property Search

Business Plan

Yours sincerely

BRIAN GRIFFIN FRICS FAAV
Chartered Surveyor
pp Rhoswen Marshallsea

Rural Worker's Dwelling Pencoedcae Cwmblacks Merthyr Tydfill CF48 4AJ

PLANNING STATEMENT AND TAN6 WALES APPRAISAL

The appraisal addresses the need for the dwelling and the agricultural building.
It is laid out as follows;

Paragraph 1 – Introduction

Paragraph 2 – Size and type of dwelling

Paragraph 3 – Sitting and access

Paragraph 4 - Sustainability of the enterprise and BREXIT

Paragraph 5 – The rural enterprise

Paragraph 6 – Existing labour

Paragraph 7 – Dwellings

Paragraph 8 - Farm buildings and equipment

Paragraph 9 – The development plan

Paragraph 10 - Local Context and Constraints

Paragraph 11 – The proposed business plan

Paragraph 12 – Relevant development plan policies

Paragraph 13 - Assessment of sustainable development (TAN6 tests)

Paragraph 14 – Minerals

Paragraph – Conclusion

Appendix A – Standard Man Day assessment

Forwarded as separate documents - Rightmove property search and Business Plan

1. **Introduction** – This application is for a temporary rural workers dwelling (3 years) with a 1 bedroom annex for Rhoswen's mother who is in need of regular care

1.1 A previous application for a permanent dwelling has recently been refused based on an assessment from Reading Agricultural Consultants. Their Report received by MTCBC in January was not made public, despite our requests for sight of it until the decision notice was issued in April so the applicant was not able to address the points raised in the RAC Report and to correct some factual errors within it. This re-application addresses the points raised and corrects the factual points and explains in more detail the need for the development.

1.2 TAN6 gives support for farm dwellings and agricultural buildings and it advises at 4.6:

4.6.2 Where the case is not completely proven for a dwelling permission should, not be granted for it, but it may be appropriate for the planning authority to test the evidence by granting permission for temporary accommodation for a limited period. Three years will normally be appropriate to ensure that the circumstances are fully assessed. If such a permission for temporary accommodation is granted, permission for a permanent dwelling should not subsequently be given unless the criteria in paragraphs 4.4.1 or 4.6.1 are met.

The planning authority should make clear in planning conditions the period for which the temporary permission is granted and that the temporary dwelling will have to be removed when that period expires. It should also include an informative attached to the planning decision notice stating the requirements that will have to be met if a permanent permission is to be granted. It will be unsatisfactory to grant successive extensions to a temporary permission if that will result in a permission having a total duration of more than three years.

1.3 The advice goes on to say at para. 4.7:

4.7 Rural enterprise dwelling appraisals 4.7.1 Planning applications for new permanent and temporary rural enterprise dwellings in the open countryside need to be supported by robust evidence. A Rural enterprise dwelling appraisal must accompany planning

applications for this type of development and include information sufficient to enable the planning authority to make a full and effective assessment.

The appraisal should address the following tests:

- The functional test to provide evidence of whether there is a need for a resident worker for the proper functioning of the enterprise. (See paragraph 4.8.1).*
- The time test to provide evidence of the labour requirement for the worker who is working on the justifying enterprise. (See paragraphs 4.9.1).*
- The financial test to provide evidence of the economic sustainability of the justifying enterprise and identify the size of dwelling that the enterprise can sustain, ensuring that the size of the dwelling is commensurate with its functional need and financial justification. (See paragraphs 4.10.1 - 4.10.3).*
- The other dwellings test to identify whether there is an existing dwelling or building suitable for conversion on the enterprise or dwelling in the locality that could meet the identified functional need. (See paragraphs 4.11.1 - 4.11.2).*
- Other normal planning requirements test to demonstrate that the dwelling is suitably located to fulfil its identified need and to minimise impact on the wider environment. (See paragraphs 4.12.1 - 4.12.2).*

- 2. Size and type of dwelling** – The proposed dwelling is a 2 bed single storey log cabin with a 1 bed annex for Rhoswen's mother who is a dependent relative. The footprint of the Cabin is 72 m². The proposed farm building has a foot print of 450 m².
- 3. Siting and access** – The site for the temporary dwelling is where a previous farmhouse stood which has since been lost through dereliction (previous owner). The site for the farm building is on the west side of the hardcored yard area. The access is existing and once living on site will save the applicants travelling to and from Heolgerrig 2 – 3 times per day. Overall there is little increase in use of the access. Access is via the A4060. The access track is stoned and is owned by the Earl of Plymouth on whom we have served Notice.

4. Sustainability of the enterprise and BREXIT –. TAN 6 at para.10 with regards to a possible financial test says:

4.10.1 The rural enterprise and the activity concerned should be financially sound and should have good prospects of remaining economically sustainable for a reasonable period of time, usually at least 5 years.

4.10.2 Evidence of actual or potential economic performance will be required. To assess economic sustainability it will be necessary to show the business has a reasonable prospect of providing a market return for all operators for the amount of management and manual labour inputs, including the job for which the rural enterprise dwelling is being sought, for at least five years from the anticipated completion of the proposed development. This should be assessed on the basis of what is a realistic income for the skills of the operator^{23, 24}. A financial test is also necessary to assess the size of dwelling which the enterprise can afford to build and maintain. Dwellings which are unusually large in relation to the needs of the enterprise, or unusually expensive to construct in relation to the income it can sustain in the long-term, should not be permitted. It is the requirements of the enterprise rather than of the owner or occupier which are relevant to determining the size of dwelling that is appropriate.

4.1 The need for a forward looking business plan is required for an application for a temporary dwelling and a Business Plan is submitted on an in confidence basis separately.

4.2 With BREXIT, the UK will be taking back control over its agricultural and rural policies. The UK Government foresees a seven year transition period commencing in 2021 towards a UK controlled rural economy where secure home food production and provision of public goods and services by farmers becomes more central. The Welsh assembly using its devolved powers will tailor these objectives to the Welsh scenario.

4.3 We know thus far that BREXIT has produced a weaker Pound which has increased demand for UK grown food by 7 % as Supermarkets now find it less

expensive to buy UK grown food compared to importing food from abroad on the back of a strong Pound.

- 4.4 Whilst subsidies linked to production will go over time, they will be replaced with environmental based payments the detail of which the Welsh Assembly has not yet released. Therefore at this stage we can only make assumptions based upon the information to date.

5. The rural enterprise – Pencoedcae Farm is a 14 ha (35 acres) holding with Grazing on Merthyr Common (over 3,200 ha, 8,000 acres). The farming enterprise is based at Pencoedcae and comprises the main block at Pencoedcae, the Common Land grazing and an outlying field at Heolgerrig where Rhoswen Marshallsea lives. The enterprise is managed by Rhoswen Marshallsea which has the holding number 58/067/0195.

- 5.1 The holding has two enterprises being suckler cows (Herefords) based on pedigree breeding stock and breeding of Ponies and Coloured horses.
- 5.2 The suckler cow enterprise is a conventional upland cattle enterprise. At my site visit in July the holding at the following stock:

26 suckler cows, single suckle (15 left to calve)

4 18 month old breeding heifers

3 6 – 10 month old heifers

2 Bulls (pedigree Hereford)

9 Young calves

3 Calves had recently been lost at calving as no one was present

4 heifers due to calve

By the Autumn there will be 24 calves. Currently there are 46 beef cattle of various ages plus the additional 15 calves to be born, making a herd of 61 cattle.

- 5.2 The youngstock are mainly reared and sold on as forward store cattle. Calving is undertaken within the farm buildings / yard area from January through to June with some in the Autumn.
- 5.3 The horse and pony enterprise is a bespoke enterprise managed by Rhoswen Marshallsea using her equine qualifications and experience.
- 5.4 The horses and ponies are kept in separate groups each requiring a bespoke management regime, with some kept at Pencoedcae Farm and some for security reasons kept at Heolgerrig.
- 5.5 The 8 Welsh Section A mares are kept out on the Common all year round except for a couple of days in the late Autumn when they are brought in, wormed, their feet trimmed and then returned to the Common. Their foals are kept back and housed, halter broken, micro chipped and pass ports obtained for them. They are then sold on in the mid winter as riding ponies in the UK and Europe.
- 5.6 A herd of 7 large cob mares are kept, being coloureds and part breeds. These are kept on the owned land at Pencoedcae and the most valuable ones at Heolgerrig. From September to April the mares are stabled by night and out by day for 1 – 2 hours. They are let out in pairs in rotation after being rugged up during which time they are mucked out.
- 5.7 Their foaling takes place at Heolgerrig as sufficient supervision is not possible at Pencoedcae. The two Stallions are also kept at Heolgerrig to protect them from theft where they are stabled and let out by day. The two most valuable mares are also kept at Heolgerrig to ensure safe foaling and for their security. These mares are worth in the region of £25K - £30K. Presently half of the coloured stock are kept at Pencoedcae and half at Heol Gerrig
- 5.8 5 Welsh Section C mares are kept which live out at Pencoedcae but are rugged up for the winter and kept on the owned land. 1 Welsh Section D is kept which is managed the same as with the Cob horses.
- 5.9 In summary 8 ponies live out over winter, the rest (typically 13 mares, 2 stallions) are stabled at night and let out by day where they are handled and worked according to their sale market during the winter. The progeny of the Cobs that

are retained for sale as 3 year olds are stabled at night during the summer as well and usually total 6 horses / ponies.

In hand breeding stock –

7 large brood mares + progeny being retained (1-3 year olds – typically 2 - 3)

5 Welsh Section C brood mares + foals

1 Welsh Section D mare + foal

2 Geldings

2 Stallions

8 section A mares + foals

5.10 In total in July 2022 there were 21 breeding mares (8 on the Common – semi feral) and 15 kept in hand for breeding for onward sale.

5.11 Rhoswen Marshallsea is BHS 3 qualified. The Coloured ponies and horses are registered under the prefix Capability with the Coloured Horses and Pony Society, whereas the Welsh Section ponies have the prefix Wheatley with the Welsh Pony Society. The 17 Mares that are bred from are scanned as will be any visiting mares to confirm that they are in foal.

5.12 The range of prices that the applicant receives for her horses and ponies are:

£250 - £350 for the Mountain ponies (Welsh Section A) at 6 – 7 months of age.

£5,000 - £10,000 for the larger Welsh Pony and Cob females.

The best Cob breeding mares are worth £25,000 -£30,000. These breeding mares have won an impressive array of Prizes at Shows across Wales which are displayed at Heolgerrig.

5.13 The Coloured mares are put with a Stallion with a stud fee of circa £1,800. Winter fodder is mainly purchased in.

5. **Existing Labour** - The business trades as a Partnership between Rhoswen Marshallsea and Andrew Harris, with Rhoswen full time and Andrew part time. Andrew also undertakes farm contracting work using the Farm's machinery and equipment. Some of this work is on local Farms and some is away from the holding where the work is of an agricultural type but not closely related to Pencoedcae Farm.
7. **Dwellings** - There is no dwelling on the holding. There was formerly a dwelling on the farm but due to dereliction that dwelling was lost (when owned by a previous owner, Mr Mahoney). Previously a dwelling served the holding (Robin's Nest) which has changed hands several times owing to its somewhat complicated planning history and concerns about its stability in that it was positioned outside of the permitted plot (by some 200 m) and built on a former refuse tip making the site unstable. The property is known to have severe settlement issues.
- 7.1 The property which was built some 40 years ago has recently been sold at Auction for £90,000 on the basis that the property could not be viewed in person owing to a large sink hole that had opened up on site. The property formally had an agricultural occupancy restriction but it was lifted by the Council, despite a request from the applicant to keep the restriction as it could if purchased for a realistic price be knocked down and rebuilt on a stable site on the holding and then serve Pencoedcae Farm.
- 7.2 At the on line auction the applicant bid up to £53,000 for the property being the price their Valuer considered it was worth given its history and condition. The dwelling sold for £93,000.
- 7.3 Below is a photo of Robin's Nest, which also has fire damage, taken from the Sale Catalogue.



LOT
82

The Robins Nest, Mountain Hare, Merthyr Tydfil CF48 4AJ
Guide Price £37,000+ (plus fees/costs, see page 2)



Development Opportunity

DESCRIPTION

An opportunity to acquire a property which has been fire damaged but benefits from a plot measuring approximately 1 acre. The site would be ideal for development of a new detached dwelling or use of the land such as a smallholding. The site is ideally situated for access to Merthyr Tydfil town centre, its retail parks and also the A460 and A470 Heads of the Valleys road offer excellent transport links.

ACCOMMODATION

Please note the property previously comprised:

Ground Floor: Entrance hall, lounge, dining room, kitchen/diner utility, storeroom, bedroom 4/study, bedroom 5 with ensuite

First Floor: Landing, 3 bedrooms, bathroom

Outside: Spacious plot with lawned area to front, parking area for several cars and detached dwelling with further land to rear.

TENANCIES: To be sold with vacant possession

TENURE: Advised Freehold - to be verified by solicitor

VIEWING SCHEDULE

Date

Time

STRICTLY NO ACCESS FOR VIEWINGS

Paul Fosh Auctions Contact: Sean Roper

Sale Catalogue, Robin's Nest March 2020

7.4 The applicant lives about 5 – 6 miles away at Cae Rhos Heolgerrig, CF481RN in a Caravan on a site with 2 ha which is all within the Merythr Tydfill settlement boundary.

8. **Farm buildings and equipment** - The enterprise is supported by a modern range of farm machinery and equipment and a set of modern farm buildings comprising:

267 m² livestock shed

195 m² livestock shed

Hardcored area for storing bagged silage and haylage

- 8.1 The enterprise has two horse boxes, tractor and work shop tools and equipment which are kept at Heolgerrig along with the fuel where Rhoswen lives in order to protect them from theft and damage.
9. **The Development Plan** - The LPA has recently adopted (January 2020) its Replacement Local Development Plan. It does not have a specific policy for rural enterprise dwellings so we have used the tests in PPW and TAN 6 Wales.
10. **Local Context and Constraints** - The site is within the countryside, accessed off a Bypass and via a no through farm road. The land to the north of the holding is bordered by the Nant Blacks stream which runs through a belt of ancient woodland. A property to the west (Robin's Nest) is shown on the Constraints Map as having TPOs and an area of land on the east side of the holding is a site of a former Iron Ore mining Village. Generally the Farm appears to be within an area of outstanding historic interest, although the whole Plan flags up with this designation, presumably linked to past mineral workings. The land further to the north and east is part of Merthyr Common.
- 10.1 The site and holding is not within a high risk flood zone or sensitive ecological sites.

11. The proposed business plan – The enterprise is at a turning point. The beef enterprise compared to the equine enterprise is low key, will continue as present. The equine enterprise is currently split between Heolgerrig and Pencoedcae Farm, depending on the value and needs of the horses and ponies. Heolgerrig is within the development boundary and will be sold. The proposal is to move all their equine stock to Pencoedcae Farm including the valuable breeding mares and stallions. In addition the applicant is being asked by clients to provide livery for Show Horses, i.e. they stay at Pencoedcae shortly before and after the Shows and to receive visiting mares to their stallions.

11.1 To achieve these aims and to enable the business to grow and be sustainable in the future the applicant needs to be able to reside on site at Pencoedcae Farm. There is not sufficient land or buildings at Heolgerrig and that site is to be developed in due course. The Business Plan is forwarded as a separate document.

11.2 As the application proposes some changes to the business we have applied for a temporary dwelling for three years.

12. Relevant Planning Policies - Local Development Plan: - Section 38 of The Planning and Compulsory Purchase Act 2004 requires that in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the area comprises the Merthyr Tydfil Replacement Local Development Plan 2016 – 2031 and within which the following policies are of relevance:

Policy SW11: Sustainable Design and Place making Development must contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design. Where appropriate new development will be required to: 1. be appropriate to its local context in terms of scale, height, massing, elevational treatment, materials and detailing, layout, form, mix and density; 2. integrate effectively with adjacent spaces, the public realm and historic environment to enhance the general street scene and create good quality townscape; 3. not result in an unacceptable impact on local amenity, loss of light or privacy, or visual impact, and incorporate a good standard of landscape design; 4. contribute to the provision of green infrastructure, including open space in accordance with the Council's standards, sustainable drainage systems where appropriate, and ensure that the County Borough's network of green infrastructure is accessible and connected; 5. allow access for the widest range of people possible, and demonstrate that any traffic movements will not have an unacceptable impact on local amenity or highway safety and satisfy the Council's parking standards; 6. incorporate a range of inclusive/adaptable design specifications, a mix of house types, tenures and sizes to meet identified local needs; 7. incorporate resource efficient/adaptable buildings and layouts using sustainable design and construction techniques; 8. minimise the demand for energy and utilise renewable energy resources; 9. provide and protect relevant utility services and infrastructure without causing any unacceptable environmental impacts; 10. incorporate measures to improve ground and surface water quality wherever possible; 11. provide adequate facilities and space for waste collections and recycling; and 12. promote the creation of healthy and active environments and reduce the opportunity for crime and anti-social behaviour.

Policy CW1: The Historic Environment The integrity of our historic environment assets will be conserved and enhanced. Development proposals will only be permitted where it can be demonstrated they would preserve or enhance the architectural quality, character or the historic or cultural importance of our designated historic environment assets. Development affecting undesignated historic environment assets including, Locally Listed Buildings or structures, Landscapes of Outstanding Historic Interest in Wales, Urban Character Areas and Archaeologically Sensitive Areas should have regard to their special character and archaeological importance.

Policy EnW1: Nature Conservation and Ecosystem Resilience Development proposals will be required to promote the resilience of ecosystems. In particular, proposals will be required to maintain and enhance biodiversity interests unless it can be demonstrated that: 1. The need for the development clearly outweighs the biodiversity value of the site; and 2. The impacts of the development can be satisfactorily mitigated and acceptably managed through future management regimes.

Policy EnW4: Environmental Protection Development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from either: • Pollution of land, surface water, ground water and the air; • Land contamination; • Hazardous substances; • Land stability; • Noise, vibration, dust, odour nuisance and light pollution; or • Any other identified risk to public health and safety.

12.1 There are no suitable traditional buildings on the holding so a new temporary dwelling is proposed and assessed under TAN6 Wales / PPW. There are also no Supplementary Planning Documents in respect of rural enterprise dwellings.

12.2 para. 7.69 National policy contained in chapter 9 of PPW seeks to strictly control the development of new dwellings in the open countryside, where there is generally an absence of existing employment opportunities, services and public transport facilities. However, PPW acknowledges that there may be instances where sensitive infilling or minor extensions to groups of dwellings may be acceptable (in particular for affordable housing to meet local need). Proposals for such development will be assessed against this national policy framework. Where new development is justified in the open countryside. National policy also makes provision for new rural enterprise dwellings and 'one planet developments' as exceptions for residential development in the open countryside and clear guidance on these types of development is set out in TAN 6 Planning for Sustainable Rural Communities (July 2010)."

In addition to the Adopted LDP the following policy, guidance and documentation supports the relevant LDP policies.

Planning Policy Wales:

National planning policy in the form of Planning Policy Wales (Edition 10, 2018) (PPW) is of relevance to the determination of this application.

Chapter 4 of PPW deals with planning for sustainability – Chapter 4 is important as most other chapters of PPW refer back to it.

Chapter 5 of PPW sets out the Welsh Government guidance for Productive and Enterprising Places and paragraph 5.6 addresses support for the rural economy and farm diversification.

Technical Advice Notes:

The Welsh Government has provided additional guidance in the form of Technical Advice Notes. The following are of relevance:

- Technical Advice Note 6 – Planning for Sustainable Rural Communities (2010)
- Technical Advice Note 12 – Design (2016)

Other relevant evidence or policy guidance:

- Manual for Streets (Welsh Assembly Government, DCLG and DfT - March 2007)
- Welsh Government Circular 016/2014: The Use of Planning Conditions for Development Management

Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations Act (Wales) 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet its sustainable development (or wellbeing) objectives. This report has been prepared in consideration of the Council's duty and the "sustainable development principle", as set out in the 2015 Act. In reaching its recommendation a Council should ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

- 13. Assessment of sustainable development** – The proposal is for a temporary rural dwelling on a mixed but largely equine rural enterprise and for a general purpose farm building. Paragraph 4.6.2 says: *Where the case is not completely proven for a dwelling permission should, not be granted for it, but it may be appropriate for the planning authority to test the evidence by granting permission for temporary accommodation for a limited period. Three years will normally be*

appropriate to ensure that the circumstances are fully assessed. If such a permission for temporary accommodation is granted, permission for a permanent dwelling should not subsequently be given unless the criteria in paragraphs 4.4.1 or 4.6.1 are met.

4.6 New dwellings on new enterprises

4.6.1 If it is considered that a new dwelling will be essential to support a new rural enterprise, it should satisfy the following criteria:

- a. clear evidence of a firm intention and ability to develop the rural enterprise concerned (significant investment in new buildings and equipment is often a good indication of intentions);
- b. clear evidence that the new enterprise needs to be established at the proposed location and that it cannot be accommodated at another suitable site where a dwelling is likely to be available;
- c. clear evidence that the proposed enterprise has been planned on a sound financial basis;
- d. there is a clearly established functional need and that need relates to a full-time worker, and does not relate to a part-time requirement;
- e. the functional need could not be fulfilled by another dwelling or by converting an existing suitable building on the enterprise, or any other existing accommodation in the locality which is suitable and available for occupation by the workers concerned; and
- f. other normal planning requirements, for example siting and access, are satisfied.

Para. 4.8.1 A functional test is necessary to establish whether it is essential, for the proper functioning of the enterprise, for one or more workers to be readily available at most times. It should relate to unexpected situations that might arise, for which workers are needed to be on hand outside of normal working hours for the particular enterprise. Such requirements might arise, for example, if workers are needed to be on hand night and day to deal with an emergency that would threaten the continued viability and existence of the enterprise without immediate attention. Where there are existing

dwelling(s) on the enterprise then the need for additional workers to live on the site for the proper functioning of the enterprise must be demonstrated to be essential.

13.1 In addition to the above, security is also a relevant issue particularly on an urban fringe site. It is a pedigree based equine and beef holding that operates for 365 days of the year. The nearby property Robins nest was fire bombed when left empty for a while. In respect of the para. 4.6 tests we advise:

a. clear evidence of a firm intention and ability to develop the rural enterprise concerned (significant investment in new buildings and equipment is often a good indication of intentions)

13.2 The applicant has gained a BHS grade 3 qualification and has replaced older pole barn type buildings with steel frame modern buildings. Both the semi feral Ponies and the in hand Coloured horses and ponies have been registered with their respective breed societies. Many Show Prizes have been won by the applicant's stock. In addition the Cattle have been upgraded by buying in Pedigree Cows and two Pedigree Hereford Bulls. The farm has modern machinery and equipment.

13.3 The applicant has good contacts in the Horse, Pony and pedigree cattle movements. She has demonstrated clear evidence of a firm intention and ability to develop the enterprise further.

b. clear evidence that the new enterprise needs to be established at the proposed location and that it cannot be accommodated at another suitable site where a dwelling is likely to be available;

13.4 The applicant has a dwelling at Cae Rhos Heolgerrig, CF481RN some 5 – 6 miles distant where she has 2 ha of land and a general purpose building. However almost all of their land is at Pencoedcae Farm and the Heolgerrig site is within the settlement boundary of Merthyr Tydfil. We are not aware of any dwellings that are suitable and available with land that would be a better location. Dwellings in the locality on the edge of the Town are suburban plots with no facility for parking up tractors and storage of workshop materials, fuel and tools. Nor is there space for a foaling barn or foaling paddock.

c. clear evidence that the proposed enterprise has been planned on a sound financial basis;

13.5 Please refer to the applicant's Business Plan which is forwarded separately.

d. there is a clearly established functional need and that need relates to a full-time worker, and does not relate to a part-time requirement;

13.6 The functional need issues concern:

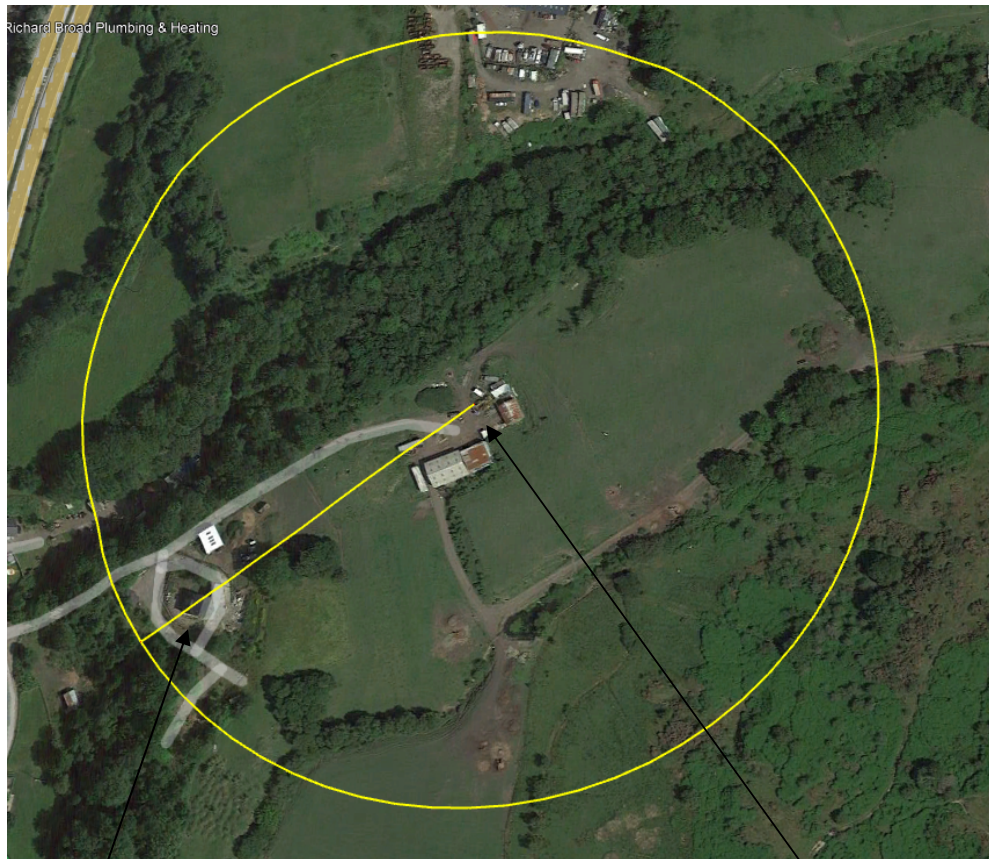
- Horse and pony management of the coloured horses and ponies which are housed at night for part of the winter. The 1 – 3 year old equine stock being trained and managed for sale as competition type horses are stabled at night all year round.
- The management of mares taken in for servicing by the stallion.
- Looking after the Show horses and ponies taken in on a B & B basis .
- Foaling of the in- hand horses and ponies.
- Security is a real issue at this location being just off a Bypass, close to the Common and urban fringe and yet somewhat isolated. Theft of diesel, fire and general vandalism is a persistent problem. No tools, equipment, fuel or even the tractors can be left on site unattended. Robins Nest, the nearby dwelling was fire bombed when left empty.
- Calving of the suckler cows mainly in Winter / Spring. Giving aid to calving when cows are struggling to present and deliver their calf(ves). Three pedigree calves were lost this spring as there was no one in attendance.
- Attending to milk fever (calcium / magnesium deficiencies) in cows shortly before or after calving. Cows can die within a few hours if not promptly treated.
- Ensuring calves suckle within first few hours of birth so that they receive their vital supply of colostrum.

- Care and treatment of the young stock throughout the year – treating viral infections that can debilitate a young calf or cause it to die.
- Housing of the beef cattle November – April when cattle will need attention at short notice at any time of the day and night in respect of detecting viral illness (e.g. pneumonia) which require treatment at short notice to avoid suffering and financial losses.
- A standard man day assessment is provided at Appendix A.

e. the functional need could not be fulfilled by another dwelling or by converting an existing suitable building on the enterprise, or any other existing accommodation in the locality which is suitable and available for occupation by the workers concerned; and

13.7 There are no buildings suitable for conversion on the holding. The eastern fringe of Merthyr Tydfil is some 400 m distance on the opposite side of the bypass. A Rightmove search has been undertaken the results of which are forwarded as Appendix B.

13.8 Robins Nest is located 200 m to the west of the farmstead. It was recently sold at a 'blind' auction for £93,000 and has significant settlement and fire damage problems having been built 40 years ago on a former refuse tip. The applicant bid up to £53,000 for it but at £93,000 it greatly exceeded what the business could afford given the property's need for underpinning etc. Below is a Google.



Robin's Nest

Pencoedcae Farmstead (Yellow circle is 200 m radius)

13.9 Below is a Google Aerial showing the Farms setting in relation to Merthyr Tydfil's eastern boundary. The yellow circle indicates a 400 m radius of the farmstead.



13.10 The Rightmove search based on a 0.5 mile search radius produced 15 properties for sale and none for rent. The Sale properties included a number of building plots for sale between £60,000 and £100,000. These plots are small suburban plots with no capability for parking farm tractors or secure storage for a workshop, tools and fuel, or foaling horses.

f. other normal planning requirements, for example siting and access, are satisfied.

13.11 The application site is close to the existing buildings and on the site of the former farmhouse (now lost). There is an existing access which would continue to service the farmstead. Once the applicants were resident on site it would save their travelling to and from Heolgerrig (mainly by tractor). In effect a dwelling on site would generate similar vehicle movements to the current situation.

13.12 The application site is a hardcored area with no ecological features. An Ecology Report confirmed that there is no ecological interest.

13.13 A Mining report has been undertaken.

14. Minerals - The site is within an area of a known mineral resource (Coal) and the locality bears the evidence of past workings. However the re-use of 0.1 ha of land to residential use on the site of a former dwelling will not undermine the protection for the mineral reserves.

15. Proposed farm building - The increasing number of livestock being kept and housed over winter along with housing for tractors and machinery / equipment requires an additional general purpose building.

16. Conclusion

- i) A temporary dwelling for three years is sought on a developing equine and beef unit at Pencoedcae Farm, which is supported by PPW and TAN6 Wales when certain tests are met.
- ii) Historically the farmstead was served by a dwelling but previous owners have let the dwelling go, either through neglect or it would appear by not complying with the relevant planning consent.
- iii) The farming enterprise is an upland type enterprise that carries a breeding herd of Hill horses and ponies which vary in value from a few hundred pounds to between £20,000 and £30,000. The equine enterprise is currently split between two sites and the applicant needs to get all stock onto one site (Pencoedcae Farm) so that the necessary level of supervision of foaling, night checks and security can be provided. In addition B & B for show Horses and servicing of visiting Mares is to be introduced once the applicant can live on site.

- iv) In order to effectively manage the livestock enterprises and the farming business it is essential for Rhoswen Marshallsea to live on site so that she is readily available to attend to any livestock or other matters that occur outside of normal working hours. The scale of the enterprise will be sufficient to employ her on a full time basis with part time help.
- v) The enterprise has been built up over a number of years and has now reached the stage where the Show Horse B & B and the Stud sides of the business can be undertaken once accommodation on site can be achieved, thereby producing a sustainable and profitable enterprise.
- vi) The site for the dwelling (a 75 m² footprint temporary dwelling) is on the site of a former dwelling in a non prominent location thereby allowing its occupier to be readily available and not detract from the character of the rural area.

BRIAN GRIFFIN FRICS FAAV
Chartered Surveyor
pp Rhoswen Marshallsea

Appendix A

Table 3 Standard Man Day Assessment

The Agricultural Budgets and Costings Book 94th Edition & Equine Business Guide 7th Edition

Enterprise	No / ha	Multiplier	Total Days
Section A (semi feral)	8	2 ¹	16
Section A foals (stabled and handled for 2 – 3 months)	7	4.7 ²	32.9
In hand brood mares (most valuable)	3	76	228
Foals	3	35	105
Show Horses B& B	21	1.59 ³	33.39
3 other breeding mares	3 bred from typically per year	76	152
Foals	2	35	70
Stud services	7 mares kept for 2 months on part livery	13.8 ⁴	96
		Sub total 733.3 Reduce by 40% for 11-20 horses	Equine 440.3
Bulls	2	3.5	7
Suckle cows with calf to weaning age	25	1.35	33.75
Total Enterprise Labour Requirement		40.75 + 15% maintenance and management (6.1)	Cattle 46.85
Farm Total			487

Total standard man requirement for the enterprise is 487 days per annum. or 1.7 full time workers

NOTES

1. Equine Business Guide gives a figure of 30 day per horse, but these feral ponies receive little work (apart from their foals). A figure of 2 days per feral pony is used
2. Foals of section A's are stabled and handled for 2 – 3 months prior to sale as riding ponies and pets. This is similar to DIY livery for which the SMD figure is 23 days per horse. As the foals are handled / housed for 2 – 3 months only, we have used a figure of 4.7 SMDs ($2.5/12 \times 23$)
3. The Show horses typically will stay for 7 days on full livery. The figure used is therefore $83 \text{ days} \times 1/52 = 1.59$
4. Mares kept on livery for 2 months are similar to a full livery at 83 days per mare / year. We have used a figure of $13.8 - 2/12 \text{ months} \times 83 \text{ days}$
5. 285 SMDs equal a full time worker. The enterprise has a labour demand of 1.7 standard full time worker plus which is provided by Rhoswen Marshallsea (full time) and 1 – 2 part time workers who would assist during the busiest times of the year, i.e. visiting mares and show Horses.