

Farm Diversification – SPG responses

Respondent	Comment	Recommended Response	Officer Recommended Change
Coal Authority	<p>Agricultural diversification has the potential to need to consider a wide range of planning issues, including contamination and unstable land. I note that you are not proposing to address the issue of contamination in the SPG, presumably because it is a policy issue relevant to all forms of development which is addressed in other LDP Policies. As part of the need to consider contamination from agricultural sources, it is necessary to consider gas migration from mining legacy in the change of use of agricultural buildings. This is because agricultural buildings are unlikely to have been developed with gas protection due to their use.</p> <p>Unstable land arising from mining legacy is also a potential planning consideration. However this is also an issue relevant to all forms of development covered by other LDP policies. Therefore I do not consider that anything explicitly needs to be included within the SPG.</p>	<p>Comments noted and we agree with the second paragraph.</p> <p>The issue of land contamination and unstable land is wider than the scope of the Farm Diversification Policy in the LDP.</p> <p>Land contamination and unstable land are covered under policies within Planning Policy Wales.</p>	<p>Paragraph 3.6: amend to state: ‘all schemes will be subject to all relevant LDP and National Policy’.</p> <p>Paragraph 3.6: add: ‘Planning Policy Wales’ and ‘Policy CYD LPI’ to the list.</p>
NFU Cymru	<p>NFU Cymru welcomes the recognition given to the importance of farm diversification in terms of the alternative sources of income being generated from projects which can be key to the viability and future of a farming business.</p>	<p>Comments noted and welcomed</p>	<p>No change</p>

NFU Cymru	<p>3.1 Re-use of existing buildings: The document suggests that the NPA will expect consideration to be given in the first instance to the reuse of existing buildings. Existing buildings may not necessarily be suitable to all types of diversification. We appreciate the note that recognises the fact that reusing existing buildings is not always possible and we would expect planning officials to take a pragmatic approach before making it a condition that existing buildings should be used. Sometimes the development of an existing building may make the project unviable and we would expect the NPA to look favourable at alternative solutions to allow the diversification project to proceed.</p>	<p>Comments noted</p> <p>Paragraph 7.5.2.3 of the LDP states: ‘In considering development proposals for farm diversification activities the NPA will expect consideration to be given in the first instance to the reuse of existing building. If this is not possible, a sensitively designed new building within the existing farm complex may be considered.</p>	No change
NFU Cymru	<p>5.2 Scale – We do feel that the scale of an operation should not be a barrier to diversification if the development is in line with overall National Park purposes. Appropriate design features should overcome concerns surrounding scale of the operation.</p>	<p>Comments noted and welcomed.</p>	No change
NFU Cymru	<p>5.3 Access – Whilst we agree that many existing farms are located in isolated locations, not all forms of diversification will result in increased traffic beyond the construction phase, i.e. IT businesses. We would hope that the relevant Highway Authority working within the BBNPA area can come to a pragmatic decision particularity in the very rural areas, which should not be disadvantaged by this guidance.</p>	<p>Comments noted.</p> <p>It’s our duty to protect highway safety and we will continue to work with the relevant Highways Authority and proceed with a pragmatic approach.</p>	No change
NFU Cymru	<p>5.5 Re-use of local stone. Small scale on farm quarrying, if appropriate, may assist in terms of reducing costs of the development however re-using local stone/building materials can be costly and it may be more appropriate for modern materials to be used. Business requirements progress over time and we would not wish for development conditions to be imposed which could be too restrictive.</p>	<p>Paragraph 5.5 of the SPG refers to the re-use of local stone and slate from the site. Our design advice for all development within the National Park is to re-use existing materials that might be on site and stone and slate would be our preferred option. In some cases this might not be possible or appropriate, however the National Park Authority will assess each application on its own merit and would consider the appropriate materials to be used.</p>	No change

NFU Cymru	5.5 We would generally agree that dark coloured roofs would harmonise and blend in within the landscape	Comments noted and welcomed	No change
NFU Cymru	Finally, we welcome the statement made at 9.1 of the draft SPG which states that ‘the BBNPA will work with applicants in bringing forward satisfactorily proposals which can benefit their business and the wider rural economy’. This in our view is a positive statement and we sincerely hope this approach will ensure that businesses can diversify and develop successfully within the BBNPA boundary.	Comments noted and welcomed	No change
Country Land Association (CLA)	It is disappointing to see fragmentation of the supplementary planning guidance notes derived from the Park Authority. Whilst we accept that each policy has its individual focus we contend that for ease of reference for applicants [original emphasis] there is a further requirement to produce a consumer-friendly/user-focused guidance note. We suggest that a comprehensive guide should aim to introduce the generic requirements of development and provide elaboration on the particular requirements of diversification projects according to type. Such an investment would assist in enhancing the standards of applications being brought forward. A forward thinking, enabling planning authority should aspire to providing its residents with transparent simple guidance which assists potential applicants to navigate through the plethora of planning policies, a point will illustrated by the list at para 3.6. The existing format with the need to cross reference elements of policies within the LDP fundamentally fails to deliver on this front and can lead applicants to overlook critical factors as they miss the cumulative factors associated with potential projects. It is disappointing to note that the list provided to direct enquiries to potentially relevant policies (cited at para 3.6) is concluded by the phrase...this list is not exhaustive. This behaviour further illustrates the conduct that has previously been described as “disingenuous”.	<p>The purpose of the SPG is to provide guidance to implement a specific policy, in this case policy 38 ‘Farm Diversification’.</p> <p>The SPG addresses the majority of forms of diversification schemes; however as an Authority we cannot anticipate all eventualities.</p> <p>This is guidance on the general requirements of Farm Diversification. Projects and detailed considerations can be given to specific form of development and for this reason, it is advised that applicants should enter into discussion through the paid pre-application service, which will provide detailed guidance, tailored to the specific needs i.e. type of development, location etc.</p>	<p>Paragraph 3.6 add:</p> <p>‘..but please note this list is not exhaustive and applicants are advised to consult the LDP and engage in pre-application advice in the design of their scheme’.</p>

<p>CLA</p>	<p>The Farm Diversification policy itself refers at section e [original emphasis] to the fact that nay new buildings or conversions...that form part of the proposal...are in accordance with Policy CYD LPI criterion 4 and Policy 23. CYD LPI sets out the forms of development permissible outside of settlements whilst Policy 23 refers to sustainable design in the adaptation and re-use of existing buildings. CYP LPI [sic] criterion 4 further refers both back to Policy 38, but also to Policy 43 which deals with Neighbourhood, Village and Rural shops. Policy 43 deals with the closure of such facilities and makes reference to named 'Key settlements', but makes no reference to such developments in other areas. Policy 23 requires the attainment of minimum standards including the integration of low or zero carbon technologies within the scheme design where appropriate. Disappointingly, what is absent from this policy is viability testing for incorporation of these technologies. Economic viability is the cornerstone to any business decision in any enterprise type. The overtly burdensome nature of this prescriptive policy will jeopardise scheme delivery.</p>	<p>We appreciate that policy context is complex and references are intended to guide applicants appropriately, however this can't be exhaustive, due to the unique nature of all applications.</p> <p>Policy 23 requires sustainable design to be investigated and detailed within the Design and Access Statement submission. Often such measures will improve the economic service of the building and would benefit in the running costs of the site.</p> <p>Measures to implement low or zero carbon technologies are covered by Building Control.</p>	<p>No change</p>
<p>CLA</p>	<p>Para 4.3 indicates a presumption in favour of the sympathetic conversion of existing buildings. There appears to be no regard for economic viability and the policy fails, to illustrate how an applicant can successfully demonstrate the need for a new building over conversion. Clarification as to how this presumption is overturned would be welcomed.</p>	<p>Economic viability can form part of the justification not to convert and existing building and would form part of the application.</p> <p>Each application will be considered on its own merit.</p>	<p>No change</p>

CLA	<p>Para 7.1 provides the prospect for a new build being preferable to the conversion of a historic or listed building. In these instances, where this is the case, rather than see the deterioration or loss of the older building, we would welcome the prospect of further consideration for market housing as this could assist funding for the diversification enterprise in additional to providing a small number of residential units.</p>	<p>It is not the intention of paragraph 7.1 to suggest that a new building is preferable over the conversion of a historic or listed building. This paragraph is included to highlight that Listed Building Consent might be required and consideration will be given to the impact of the proposed development on the historic fabric and character of the Listed Building. In constructing a new building close to a Listed Building, its setting would also be a planning consideration.</p>	<p>No change</p>
NRW	<p>We welcome the inclusion of Section 6 (Biodiversity) which recognises that building conversions have the potential to impact upon protected species such as bats, and advises that surveys would be required of such developments to ascertain the extent that this might be the case. We advise that if protected species and/ or their habitats are affected by building conversions, protection of both the animals themselves and their habitats should be ensured.</p>	<p>Comments noted and welcomed</p>	<p>Add:</p> <p>Policy 5 – Sites of Importance for Nature Conservation</p> <p>Policy 6 – Biodiversity and Development</p> <p>to paragraph 3.6</p>

<p>NRW</p>	<p>It should also be noted that Natural Resources Wales has taken over the licensing functions in respect of European Protected Species development licences from the Welsh Government.</p> <p>Therefore, in view of the above, we recommend some slight changes to this SPG as shown in bold below:</p> <p><i>The conversion of an existing building, or the use of land may impact on important environmental sites or protected sites. In the case of conversion, many older farm buildings are potential habitats for bats and barn owls, which are protected by law. An appropriate survey would be required as part of the planning submission and if evidence is found to show their presence, the animals themselves and their habitats must be safeguarded, Mitigation measures and a schedule of works will be sought and can be discussed with the BBNPA prior to submission. A licence will also be required from Natural Resources Wales to disturb or move the protected species during the construction phase or to damage or destroy their breeding sites and resting places. Further information can be obtained in the 'Best Practice in Biodiversity and Geological Conservation in Planning and Development'</i></p>	<p>Comments Accepted</p>	<p>Amend paragraph 6.1 to:</p> <p><i>The conversion of an existing building, or the use of land may impact on important environmental sites or protected sites. In the case of conversion, many older farm buildings are potential habitats for bats and barn owls, which are protected by law. An appropriate survey would be required as part of the planning submission and if evidence is found to show their presence, the animals themselves and their habitats must be safeguarded, Mitigation measures and a schedule of works will be sought and can be discussed with the BBNPA prior to submission. A licence will also be required from Natural Resources Wales to disturb or move the protected species during the construction phase or to damage or destroy their breeding sites and resting places. Further information can be obtained in the 'Best Practice in Biodiversity and Geological Conservation in Planning and Development'</i></p>
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BBNP Agents Group	Agents fully support the presumption in favour of retaining buildings that positively contribute to the historic landscape. Retention improves the visual characteristics of the working countryside and Agents advocate a more flexible definition of what constitutes 'farm diversification'. The definition defined in Draft SPG (para 3.5) is considered too narrow and may exclude significant an important buildings within the landscape	Welcome the support. Definition of Farm Diversification must be robust and relate to agriculture as set out in TAN 6.	No change
BBNP Agents Group	Coupled with the above and with regard to the reuse of existing buildings, the SPG should incorporate line drawing as to what would constitute a structure worthy of renovation. It is understood not all circumstances can be visually depicted but some form of graphical representation could be of immense assistance to a developer and aid in negotiation/discussion.	Each matter will be considered individually and it is advised to engage in pre-application advice prior to submitting and application. It is the presumption that all existing buildings should be utilised and renovated in favour of new development.	No change
BBNP Agents Group	It is advocated that the Authority takes a more flexible approach in considering potential new farm diversification schemes (new build or conversion). Although a particular project may not strictly meet precise policy criteria, a more holistic approach by the Authority in considering proposals could bring benefits that improve landscape character. By being supportive to an applicant's proposals which advocates some form of reasonable 'enabling development' thereby allowing something else to occur; should be fully considered by the Authority on a case by case basis. Such an approach can bring about 'planning gain' to the overall benefit of the community and visitors. The Authority needs to become economically aware of the implications of potential schemes and comprehend the viability and practicality as to why applicants are advocating certain proposals.	The concept of Rural Enterprise and definitions within TAN 6, is enabled under policy CYD LPI which is broader than the definition of Farm Diversification.	No change
BBNP Agents Group	At paragraph 4.1, there may be scope to include 'affordable housing' as a separate category. The completion of the current research by ABC consultants may assist in the consideration of this matter.	Re-use of redundant buildings is enabled by policy CYD LPI of the LPD. Such schemes are not considered to be farm diversification per say and therefore not appropriate to include it in paragraph 4.1. The National Park Authority will continue to work with ABC for beneficial outcomes.	No change

BBNP Agents Group	It is also suggested that the Authority establishes a project to determine the current stock of underused/redundant buildings lying outside settlement boundaries within the Park. Such structures could include amongst others, farm buildings, redundant chapels, warehouses etc. There is potential for such a project to become matched funded minimising financial outlay by the Authority. The benefit of such a programme would gain the confidence of the rural community and provide guidance to the owners of such structures before the buildings become too dilapidated.	This is out of the scope of the current consultation. Project will be considered in the review of the LDP.	No change
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