Proposals for changes to Permitted Development Rights for Agricultural Buildings and Plant.

I refer to the above Consultation and write as a fish farming business within Northern Ireland with over 40 years of continuous activity in the sector.

In reading the document, (which came to hand quite by chance, since it appears that no one from the aquaculture sector, although a fundamental part of agriculture, has been included in the schedule of consultees), it is clear that there may be a gap in knowledge about the operations and scale of fish farming in Northern Ireland.

As an example of the situation it may be useful to outline Glen Oak operations, which may afford an opportunity for comparison with a medium sized agricultural holding.

Glen Oak produces quality trout as a raw material for the agri-food processing sector. This is done on two sites, encompassing the complete life cycle from brood stock, through juvenile production to market sized trout at harvest.

This is no different than a vertically integrated pig, sheep or cow farm, in that different facilities are required for each stage of development and there is a fundamental requirement for buildings at certain stages of the activity, particularly the juvenile stage.

Also, exactly the same as with other livestock production, the demand for increased volume and efficiency has led to the use of technology to better manage and minimise the possibility of environmental impact. The technology, in terms of recirculation and bio-filtration, is based on the same science as that used in anaerobic digestion plants, albeit as aerobic digestion of waste food and faeces. Again this operation requires some form of building to assist in the management and control of the process.

This situation is not unexpected as aquaculture, as part of agriculture, is controlled and managed by most of the same National Legislation and European Directives. Therefore as the sector has grown and matured it has experienced the same pressures to utilise buildings to improve management control over the production cycle.

To provide an indication of scale, on a current basis Glen Oak’s two sites have some 3200 m² and 2500 m², or a total of 5700 m² of buildings utilised in the primary production of food within what is a medium sized farming business.

This helps to put into context the relationship of our operations to the proposed changes in Permitted Development Rights for agricultural buildings. Or simply the proposed 500 m² figure represents less than 9% of our current building stock. For any business that is looking at simple organic growth a figure of 15% or 850 m² would not be unusual.
Therefore in reply to your request for comments on the proposal for a limit of 500 m² for both agricultural buildings and buildings for anaerobic digestion plants I would suggest that these do not reflect the actual needs of the sector and certainly do not provide any opportunity for the proposal to have relevance in future years.

I would recommend that 850 m² is a more realistic figure, subject to the other criteria to which an extension of farm buildings would normally be subject to.

Additionally I note in Annex A, Permitted Development Rights, Cause A.3(2) (b) that fish farming may be at risk of being excluded from these Permitted Development Rights.

This would appear to be an anomaly as it has been the situation for over 10 years that the Department has accepted fish farming as being agriculture. Specifically, there are two Appeal Decisions where this is confirmed, being 2002/A236 and 2006/A1675.

To reinforce this situation, it is worth noting that aquaculture is controlled by Licences issued by the Department of Agriculture and Rural Development. It is also targeted as an option for rural development for existing agriculture holdings.

I trust that due consideration will be given to these comments and that future consultations affecting the fish farming sector will be more widely circulated to avoid the possibility of the sector being excluded from a process with such fundamental impact.

18th January 2013.