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# Justification Statement

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Change of use of existing buildings  
from agriculture to commercial use and  
all associated works

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Ridleywood Farm  
Ridleywood  
Wrexham  
LL13 9US

TSM & TR Lunt

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## 1.0 The Proposal

The proposal is for the change of use of existing agricultural buildings to commercial use and all associated work.

The agricultural buildings are in general all steel frame buildings with a mix of yorkshire boarding, red brick, box profile sheeting and concrete panels. They form part of the existing farm stead and fit in within the surrounding farming landscape. Proposed elevation drawings form part of this application, the client's intention is to keep the buildings with an agricultural design to ensure there will be no detrimental effect of the surrounding landscape.

The existing use of the buildings is are relate to the existing dairy enterprise. The buildings are currently used to house cattle, youngstock and machinery. Ridleywood farm comprises of 450 acres of mainly grazing and arable land.

The client's intention is to come out of dairy, therefore they wish to change the use and utilise the former agricultural buildings to allow for individual commercial units.

The buildings will be used for commercial units for private rent. This will allow the Lunt family to diversify their dairy enterprise while supporting small start up rural businesses. The change of use will provide sustainable workspace and storage for local small businesses. Approval of this application has the potential to create jobs within the small business sector as a premises will allow their business to grow once a workplace and storage site has been acquired. The proposal will improve the resilience and diversity of income within the site to stabilise its future. The workshops will also be the catalyst in the growth of the occupier's businesses providing them with flexible workspace they demand to operate their business. There will be 7 workshops within the proposed buildings and these will be rented individually to allow small rural businesses to start up and become established. After much research the client has found in the the surrounding areas commercial property is only available on a large scale and is mainly only available on long terms agreements, combined with the urban setting leading to high rents and rates making it difficult for small and start up businesses. The units at Ridleywood will fill this gap in the market and provide flexible workplaces on flexible terms to suits small businesses.

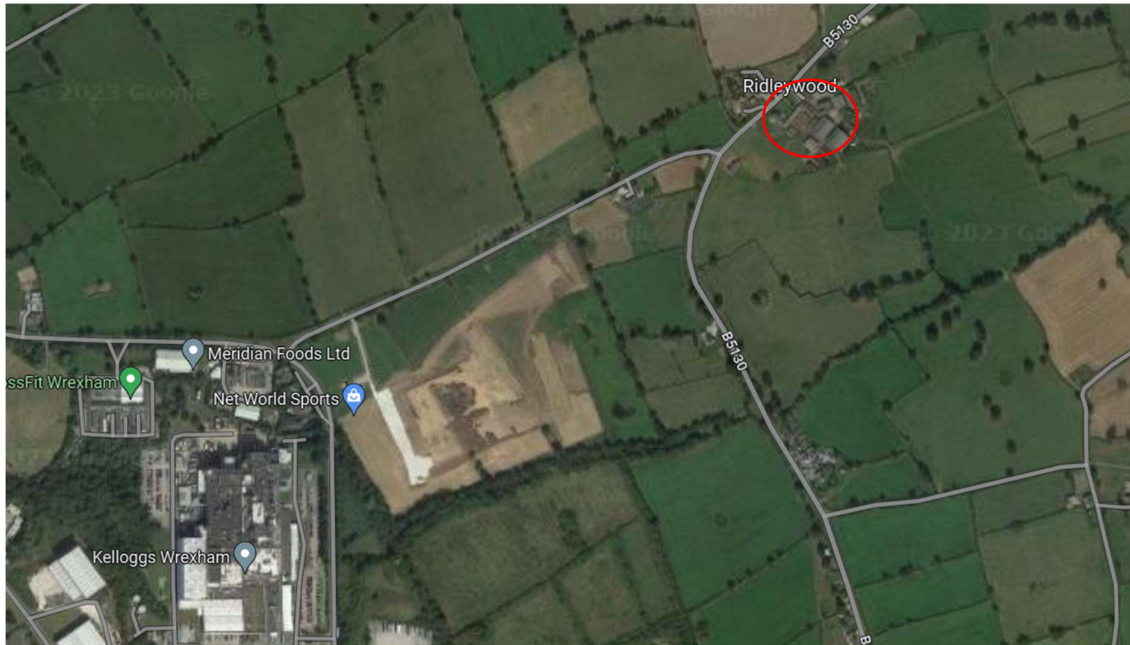
The design aims to keep a balance between the two aims of the planning system – efficient economic development and protection of the landscape.

Wrexham council planning policy E5 supports the conversion of suitably located buildings for small scale economic development/employment generating use.

The proposed change of use constitutes a natural extension to Wrexham Industrial Estate, which is recognised as a nationally and regionally important employment location. Approval of the site for employment development would make an important contribution to the ability of the Council to deliver its overall spatial strategy as set out in the draft LDP and ensure that there is adequate employment provision within the Wrexham borough as a whole to meet existing and future demand.

## 2.0 Assessments of Impacts on Environmental Quality and Existing Residential Amenity.

### 2.1 The Site



*Ridleywood Farm with Wrexham industrial Estate to the West*

The site is accessed off the B5130 and surrounded by established farms and businesses and within close proximity to Wrexham Industrial estate.

The Site is located directly to the East of Wrexham Industrial Estate. Wrexham Industrial Estate is the UK's second-largest industrial estate extending to over 550ha<sup>2</sup> and is recognised as a regionally and nationally importance employment area. It is located 2.5 miles to the east of Wrexham Town Centre.

Although the site is utilised as agricultural, employment facilities are prevalent in the vicinity of the site and therefore the wider area is characterised by employment provision, notably comprising large manufacturing and storage & distribution uses.

### 2.2 Ecology

Arbor Vitae were commissioned to undertake a Preliminary Ecological Appraisal in order to assess the impact of the development on habitats and protected species. The survey

concluded none of the habitats on the site provide areas of ecological significance and the change of use of the buildings will have no wider impact.

### 2.3 Noise

In consideration of the planning application it is predicted that there would be no significant increase in noise emissions over and above the noise emissions from existing agricultural operations.

### 2.4 Phosphates

Draft LDP Policy NE6 states that all new development will only be permitted where there is no adverse effect on the integrity of the River Dee and Bala Lake SAC, in particular through the treatment of waste water. To ensure no adverse effect on the integrity of the River Dee and Bala Lake SAC, development creating waste water discharges will be required to demonstrate there is no increase in phosphorus levels in the SAC.

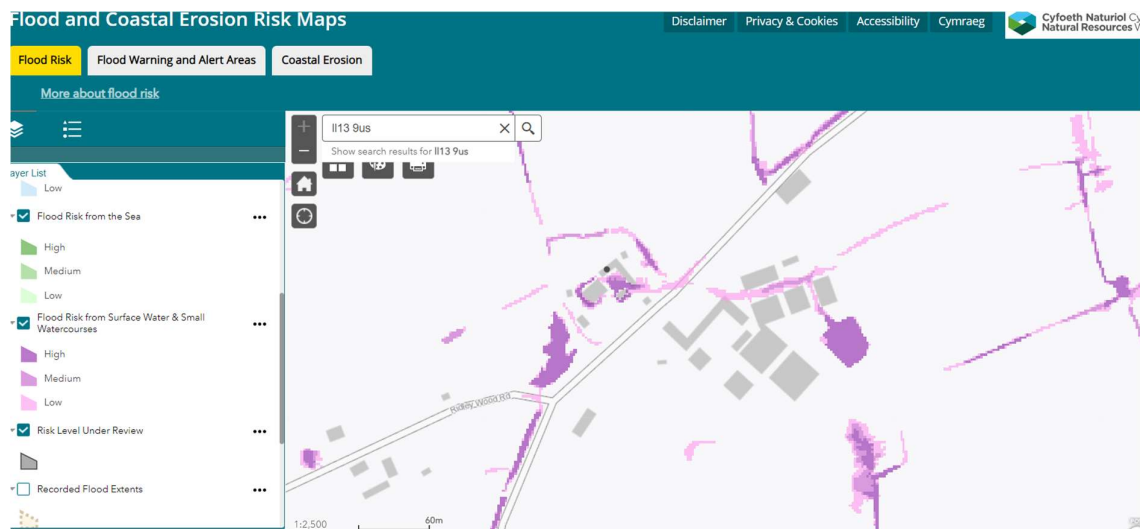
The proposed change of use will be a betterment on the existing site as the clients are proposing to take 130 Dairy cows and 70 youngstock/beef out of production. Therefore there will a large reduction in the amount of slurry produced on farm and spread on the surrounding land.

It is also anticipated the majority of the users of commercial buildings will be local to the Wrexham Borough.

### 2.5 Heritage

The site is not located within or near a Conservation Area. There are no listed buildings, Register Parks & Gardens or Scheduled Ancient Monuments within or directly adjacent to the site boundary,

### 2.6 Flood Risk



The Natural Resources Wales flood risk map identifies the site as being outside the Flood Risk Area with the existing yard areas falling within the surface water map. However, these area will be used for parking and are therefore none highly vulnerable development.

## 2.6 Highway

Ridleywood Farm is an established dairy and youngstock enterprise therefore traffic movements associated with farming activities are of high volume. The proposed change of use will result in a reduction in large traffic movements and general movements in and out of the site.

Below are existing and proposed traffic movements:

### Dairy Enterprise

6am-8pm

| <b>Movement</b>         | <b>Vehicle Type</b> | <b>No of Movements</b> |
|-------------------------|---------------------|------------------------|
| Milk Collection         | HGV                 | Daily                  |
| AI                      | 4x4                 | Daily                  |
| Feed Delivery           | Artic               | Weekly                 |
| Dairy Chemicals         | Van                 | Weekly                 |
| Seed/Maze Delivery      | Artic               | Seasonal               |
| Fallen Stock Collection | HGV                 | Monthly                |
| Cattle Delivery         | Artic               | Weekly                 |
| Cattle Collection       | Artic               | Weekly                 |
| Straw Delivery          | Artic               | Weekly                 |
| Bedding Delivery        | HGV                 | Every 3 weeks          |
| Vet                     | 4x4                 | Every two weeks        |
| Diesel Delivery         | HGV                 | Monthly                |
| Staff                   | Car                 | Daily                  |

### Commercial Use

(anticipated)

6am-7pm

|               |            |     |
|---------------|------------|-----|
| <b>Unit A</b> | <b>Car</b> | 3no |
| Unit B        | Car/Van    | 3no |
| Unit C        | Car        | 2no |
| Unit D        | Car        | 2no |
| Unit E        | Car        | 2no |
| Unit F        | Car/Van    | 3no |
| Unit G        | Car/Van    | 5no |

## Existing/On going agricultural movements

6am-8pm

| <b>Movement</b>         | <b>Vehicle Type</b> | <b>No of Movements</b> |
|-------------------------|---------------------|------------------------|
| Feed Delivery           | <b>Artic</b>        | Weekly                 |
| Dairy Chemicals         | <b>Van</b>          | Weekly                 |
| Seed/Maze Delivery      | <b>Artic</b>        | Seasonal               |
| Fallen Stock Collection | <b>HGV</b>          | Monthly                |
| Cattle Delivery         | <b>Artic</b>        | Weekly                 |
| Cattle Collection       | <b>Artic</b>        | Weekly                 |
| Straw Delivery          | <b>Artic</b>        | Weekly                 |
| Bedding Delivery        | <b>HGV</b>          | Every 3 weeks          |
| Vet                     | <b>4x4</b>          | Every two weeks        |
| Diesel Delivery         | <b>HGV</b>          | Monthly                |
| Staff                   | <b>Car</b>          | Daily                  |

Ridleywood hosts two access, both have adequate visibility in each direction. The access to the West severs the farmhouse and agricultural buildings. The East access will be use for commercial use only.

### 2.7 Landscape

The proposed change of use will have no or minimal effect on the surrounding landscape due to its reuse of existing farm buildings along with position and proximity to the other agricultural buildings on site.

## 3. Planning Policy

The Planning and Compulsory Purchase Act (2004) establishes the legislative background for town planning. Section 38() of this Act establishes the plan led approach and states that planning applications should be determined in accordance with the development Plan, unless material consideration indicate otherwise. This is reiterated in Section 70(2) of the Town and Country Planning Act (1990).

The statutory development plan for WCBC currently comprises the Wrexham Unitary Development Plan (UDP) (adopted 2005), which covers the plan period 1996 to 2011. It is important to note that this plan period ended 2 years ago and therefore there are several polices which are out of date and inconsistent with national policy.

The council has been progressing with a new Local Development Plan (LDP). The LDP covers the period 2013-2028 and would replace the UDP as the primary planning policy document against which the council consider planning applications, if adopted. However, the council have voted against the adoption of the plan.

The site is located outside of the Wrexham Industrial Estate settlement limit on WCBC's adopted proposals map, therefore the site is within Open Countryside.

The local policy states employment development in the countryside will only be permitted where it is a small scale conversion of an existing building (UDP Policy E5). In the justification text WCBC outline how development in the countryside which would result in a loss of visual and landscape character and adversely affect agriculture will be resisted.

## **Wrexham UDP**

### **Employment in the Countryside:**

#### **Policy E5**

Small-scale employment development in the countryside will only be permitted through the conversion of an existing building where:-

- a) the proposal accords with Policy GDP1; and
- b) the building is structurally sound and capable of conversion without extensive rebuilding tantamount to the erection of a new building; and
- c) any inherent characteristics of merit in the building are retained; and d) the building and resulting curtilage does not constitute an undesirable intrusion into the landscape, create access problems, nor require the provision of services at public cost

### **Small Farm-Based or Related Employment Operations**

#### **Policy E6**

Small on-farm operations such as food processing and packing, together with services to other farms, such as workshop facilities and equipment hire and maintenance, should be located within existing farm buildings. Where it can be shown that no suitable buildings are available for such operations, the erection of a new building will be permitted, provided that:-

- a) the building adjoins, and forms a logical extension to the existing farm complex;
- b) the building will not result in a detrimental intrusion in the landscape;
- c) the building does not exceed 300 square metres in area.

**Policy PS2** -The Broad Location of Development – development must not materially detrimentally affect countryside, landscape/townscape character, open space, or the quality of the natural environment.

**Policy PS3** - The Broad Location of Development – Development should use previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield land.

**Policy PS11 Biodiversity** – Encouragement will be given to proposals which improve the biodiversity value of sites and to the establishment of local nature reserves where the nature conservation and landscape interest of the and will be protected and enhanced.

**Policy EC6** - Biodiversity Conservation harm to biodiversity should be kept to a minimum and compensatory measures should be provided. Measures to improve the biodiversity value to sites and enhance their natural conservation interest and landscape quality including the establishment of local nature reserves will be supported.

**Planning Policy Wales** sets out that good design is fundamental to the creation of sustainable places where people want to live, work and socialise, with design not just being about good architecture but about the relationship between all elements of the natural built environment.

**Policy GDP1** Development Principles of the UDP sets out that development should be of scale, design and layout and in its use of landscaping, accord with the character of the site and make a positive contribution to the appearance of the nearby locality it should ensure safe and convenient pedestrian and vehicular access and be located where it has convenient access to public transport facilities and sustainable routes.

**Emerging Policy SP3** Design Principles & Master planning Framework states that all development will be required to be of high quality, sustainable design, which makes a positive contribution to the creation of locally distinctive places, ensuring compliance with master planning framework and KSS schematics.

## 4.0 Conclusion

The proposal is for the change of use of existing agricultural buildings to be used for small commercial units and all associated works.

The proposed change of use will have no impact on the site's ecology and will be an improvement on the site's existing highway movements.

It is considered that the proposed development is acceptable in its design, scale and use and it will not have a detrimental impact on the character and appearance of the surrounding area. Therefore, the proposal is in accordance with policies E5 and E6.

The proposed change of use is a diversification of an existing farm enterprise and will allow small start up businesses a base for storage and workshops which will bring some sustainable benefits both environmentally and economically. The proposal seeks to reuse existing agricultural buildings currently used as part of the dairy enterprise.

The proposal would not generate unacceptable levels of traffic and include sufficient parking and manoeuvring space. On balance it is therefore considered that the proposed use in this case is acceptable as part of the development plan policy and would not be of detriment to the rural character of the local area.

PPW establishes that development plans and development management decisions should be based on up-to-date local and sub-regional evidence relating to the economy and employment land (para. 5.4.7). It is clear from the age of the UDP that it fails to provide for

the existing and future employment needs of the authority.

The proposed change of use constitutes a natural extension to Wrexham Industrial Estate, which is recognised as a nationally and regionally important employment location. Approval of the site for employment development would make an important contribution to the ability of the Council to deliver its overall spatial strategy as set out in the draft LDP and ensure that there is adequate employment provision within the Wrexham borough as a whole to meet existing and future demand.