PLANNING STATEMENT

Change of Use of Agricultural Land (Stackyard)

To single residential lodge (Mobile Home)

Retrospective with a disabled adaptation

And improved vehicular access and driveway

At

Moss Bank Farm, Borras Road

Borras, Wrexham. LL13 9TN



Prepared on behalf of

Mr Shaun Stocker

Trevor Mennell Planning

JUNE 2025

Description

The Planning Statement has been prepared and undertaken by Trevor Mennell Planning an Architectural Consultancy on behalf of Shaun Stocker, the owner of Moss Bank Farm.

Moss Bank Farm is a registered small holding of 5 acres purchased by the applicant in a dilapidated condition. Since its purchase, the property has undergone extensive renovation to include conversion and demolition of existing buildings, concrete yards together with landscape improvements. The works to the buildings are following the granting of planning approvals listed below:-

- P/2019/0888 – two storey extension, renovation of double detached garage – Granted.
- ENQ/2020/0030 – proposed barn conversion to 1 dwelling.
- P/2021/0288 – Conversion of barn to 2 dwellings and erection of garage – Granted.
- P/2022/0421 – Non material amendment to P/2021/0288 to amend design of doors and windows – Granted

The smallholding is located within the council's wash of Greenbelt and bounded by an active sand and gravel quarry.



The farmhouse has been renovated and converted to a 3-bedroom rented accommodation with a new build detached garage. The barns have been converted to 2 no. Airbnb holiday cottages.

During the period of conversion, the applicant and his partner have lived in a static caravan which was positioned adjacent to the farmhouse in the location of the proposed new garage until 2021.



Exceptional Personal Circumstances

Mr Stocker is a high-profile veteran of the Royal Welsh Fusiliers who suffered catastrophic injuries in 2010 while on operational service in Afghanistan

. Further Exceptional Personal Circumstances are confirmed within the attached report by Tom Hall (Blesma Support Officer, Wales and West) and Lesley Griffiths, Member of Senedd. *(Appendix A and B respectively).*

The Lodge

As there was a desperate need for special disabled accommodation and that they had lived in a static caravan during the building works on site being carried out, the family upgraded the caravan by having a twin unit lodge constructed and designed specifically to suit Mr. Stockers special needs.

The lodge has been designed in accordance with BS3632 residential standards and also conforms to the Mobile Homes Act 2013 *(Appendix C)* that defines a two-part lodge as a caravan. The lodge can be moved in two sections.

The lodge conforms with the Act specifications along with its overall dimensions, a plan is attached Ref: 71441:1002. The lodge was built in the factory then delivered and assembled on site.



Local Development Plan

The Wrexham LDP adoption has now been quashed by an Order issued by the High Court and although the LDP remains a material consideration but is of little weight, the Unitary Development Plan is now returned as the adopted development plan.

Green Barrier

Moss Bank Farm is contained within the UDP wash of Green Barrier flanked to the North and South with quarry workings known as Borras Quarry, originally Borras Airfield. Borras Road divides the active quarrying operation. The main purpose of this designation of Green Barrier is to prevent coalescence of urban areas, in this case Wrexham (3 miles) and Chester (9 miles). My client's site is visually contained and enclosed by defined physical boundary's, see aerial photograph.



The replacement caravan (lodge) forms a logical extension to the rear of the site used as a concrete stack yard with hay barn previously removed. A supporting letter confirming this is attached in 'Supporting Letters'

The site is visually screened from both neighbours and Borras Road.



The existing and proposed planting will mitigate the principle of any adverse visual impact.

In terms of the current UDP Policy EC1 my client's proposal which is retrospective is contrary to the existence of the Green Barrier and would have to be classified as inappropriate development as it does not meet any of the exceptions and is a departure from the development plan. The test therefore must be that the proposal meets Exceptional Circumstances where other policy considerations clearly outweigh the harm.

Green Barrier within the UDP is being reassessed as identified in the proposed LDP currently under review with the Planning Inspectorate.

Stackyard

The land associated with this retrospective application comprises an area of agricultural land within 'Moss Bank Farm' previously used as a haybarn and stackyard, in the western corner of the site. The site associated with the proposal as a whole, comprised an area of undeveloped agricultural land accessed off Borras Road, Borras. The existing farm buildings have been converted to residential letting accommodation to also include the removal of redundant buildings and general farm paraphernalia. In all the existing small holding has had a general change of use providing rented accommodation to the area to also include additional landscaping. This followed supplementary planning approvals from Wrexham County Borough Council (WCBC) for the proposed re-development of the buildings for residential use.

The current planning application for change of use (retrospective) for a lodge in its alternative location to that previously sited near to the renovated farmhouse.

Lodge Construction Specification

The lodge which is on site and occupied by the family was built in the factory and delivered to its current location in November 2021, where it is was positioned on a 200mm thick re-enforced concrete slab above a compacted 150mmm hardcore base. This avoided any deep dig into the existing area. The lodge is built to comply with the current Building Regulations and BS3632 as amended in 2015 in line with technological advancement and improvement to living standards across Wales.

The unit is built with the following:-

- Double glazed windows and doors
- Hot water thermostatic control
- Added insultation within floors, roof and walls
- Soundproof walls
- Appliances such as fridges and cookers that are A rated

- Central heating throughout
- Renewable energy sources of power

i.e. no drop in standards from a liveable home.

The lodge is incredibly durable and can enjoy a lifespan upwards of 80 years with the right care and maintenance. Walls are typically galvanised metal frame with timber infill, insulation and sound proofing and is more energy efficient than a traditional home. Floors and roofs are traditional construction in all making a more energy efficient home. The walls are clad timber effect upvc boarding to blend in with the backdrop of natural hedgerows and trees.

Ecology

Susan Worsfold BSc ACIEEM Ecologist has been the Ecologist carrying out surveys since development commenced in 2019 including Bat Activity Surveys and taking account of newts and ecological habitat in order to encourage biodiversity opportunities. Her work has involved taking advice from Natural Resources Wales (Development Planning) during the sites progressive development. A copy of previous reports supplements the Statement *(Appendix D i / ii)* together with an Ecology Update dated 24th June 2025.

A Green Infrastructure Statement on Biodiversity Enhancement Scheme forms part of my client's application to be forwarded during the planning process.

Archaeological Watching Brief

Although it was recognised by the Council that there may be the possibility of archaeological findings, similar to those previously exposed at Borras Quarry Extraction Site. No evidence of such findings were found at Moss Bank Farm. Foundations have been carried out in accordance with TAN 24, there has been no evidence of any archaeological features revealed.

Excavations were shallow at the lodge site, again no features were found.

Contamination

There has been no evidence of spillage of agro chemicals in or around the buildings or outlying areas where it would be prudent to notify the Councils Contamination Land Team.

Drainage

Foul Water

Welsh Water have confirmed a connection to the main sewer is not feasible due to its location being 1000m away therefore the foul drainage from the kitchen, bathroom and utility room of the lodge, gravitate to a bio-disc sewage treatment plant with further tertiary treatment to a drainage field both located in excess of 5m from the lodge in accordance with building regulations approved document 'H' – Drainage and Waste Disposal. The effluent is discharged to the unsaturated Zone below providing additional treatment.

Storm Water

Storm water from the roof drain to independent rainwater pipes connected to a 'SUD' drainage system to include water butts at each outlet. Pathways and parking areas are constructed of permeable gravel which provide a sustainable drainage system mimicking the natural drainage processes for discharge.

Percolation Tests have been carried out and form part of the Statement *(Appendix E)*. The drainage field is located more than 40m from any river, stream, ditch or drain and it is more than 50m from a SAC boundary. The discharge rate is less than 2 cu.m.

Highways

Moss Bank Farm has 2 no. vehicular accesses off Borras Road. The first is to the farmhouse which is currently let, and the barn conversion holiday lets with access and parking previously approved.

The second access is still off Borras Road which has been subject to improvements but is still substandard with regards to visibility when exiting the site. Highways have confirmed that although Borras Road has a national speed limit, it is considered the average speed to be nearer 40mph and that visibility splays should be 2.4m x 140m. This visibility can be achieved by removing some hedgerow at its junction and re-planting the hedge within the inner boundary in accordance with TAN 18 – refer to Block Plan Ref: 71441:1001.

Overdevelopment

Overdevelopment is a critical consideration when taking the developments impact on the wider area. However, in this case Moss Bank Farm had an intensity of farm building to include brick parlour, stables, steel frame haybarns and containers with minimal open paddocks for grazing. Some buildings have been converted to residential units. During that time Mr Stocker and his family have lived in a static caravan which was positioned on site close to the farmhouse when work was being carried out.

I have included below a list of buildings which have either been removed or added to the site.

Buildings Removed:

- Large hay barn
- Dutch Barn
- Pig Sty
- Milking Parlour
- Nissan Hut
- Garage
- Lean to barn
- Circular Tank
- Static Caravan

Buildings Added:

- Small Shed
- Sheep Shelter
- ISO Container
- Lodge

To provide a lodge with disabled adaptation of the size on site, I consider it does not represent overdevelopment when various buildings have been removed.

Sustainability

Moss Bank Farm is very sustainable being located within 2.5 miles from Wrexham City and 9 miles from Chester. Most Primary Schools are located within 2 miles along with family doctors and Wrexham Maelor Hospital 2.5 miles. Various shops and petrol stations are all close to Wrexham which provide other necessities close by. All these options would involve a very short distance by car. Supermarkets provide various services to include shopping online a useful convenience service for the family. Electric and water services are on site and connected to the building. Moss Bank Farm is not isolated with other detached houses and holdings sporadically located nearby along Borras Road. Furthermore, the lodge respects the character of the local area, is of appropriate scale and design, is of low level and does not overshadow the farmhouse or holiday accommodation and furthermore the neighbours. The Green Barrier location provides little contribution to the identified purposes of its existence and even less to the coalition of Wrexham to Chester. The adjacent quarrying activity reduces the availability for housing giving further weight towards my clients Change of Use planning application. It is considered there would be no greater intensity of use compared to when the family lived in the previous static caravan. The site as a whole will not be densely overpopulated as the barns are converted holiday accommodation used on a seasonal basis.

Furthermore, there is adequate amenity space around each building on site with surrounding dense hedges and trees with grazing paddock areas all providing a biodiversity gain. In all, there is no demonstrable harm to the character or amenity of the area.

The site is 5 acres in area, generally flat within its topography and the design provides adequate amenity space between all residential properties. Also, there are no traffic issues as vehicles can turn on site and exit the site in a forward direction.

The Armed Forces Covenant with Wrexham Council and Other Authorities

To supplement the Planning Statement in support of my client, Shaun Stockers 'Change of Use Planning Application', I have requested assistance and further clarification of the Statutory Guidance on the Armed Forces Covenant from Thomas Hall MBE (Blesma Support Officer Wales and West) *(Appendix A i).*

Mr Hall also attended a meeting with Officers of Wrexham Council on 20th March 2025 to which minutes were taken and form part of this planning statement *(Appendix A ii)*. Both documents are to be fully reviewed when considering my client's application.

Conclusion

The development of the whole site is within Green Barrier with approximately 60% of Moss Bank Farm previously developed having obtained formal planning approval. The 5-acre site is visually contained within a defined boundary. It will not therefore result in any coalescence with neighbouring settlements as the closest settlement is Wrexham, which is to continue to be protected by its own strategic Green Barrier. The proposal together with the existing renovations and on-site changes is of low density providing open amenity space with the retention of existing landscaping (trees and hedges) maintaining bio-diversity areas. The lodge, its amenity area and its driveway are discreet, neatly settled to the rear of the developed holding. Generally, the proposal is a farm diversification. The Green Barrier in this location is no longer serving its purpose and is undermining regeneration and economic growth which is currently under review to be included within the future LDP policies.

The application is for the change of use of an area of agricultural land previously used as a stackyard on the farm holding site to a retrospective residential lodge which has been on site since November 2021 and used as Shaun Stockers family home since that time.

Shaun Stocker a high-profile veteran of the Royal Welsh Fusiliers who suffered catastrophic injuries in the Afghan war

Following living in the caravan, it became a necessity for Shaun to obtain a lodge which would support his special needs. The obvious solution was to purchase a lodge specifically designed to suit his physical needs, in particular wheelchair access with wider door openings, accessible shower etc. The family have also suffered mental trauma coming to terms with a new way of dealing with life on a day-to-day basis. The lodge, small holding and holiday lets have provided solace at those difficult times.

Wrexham Council, as with many authorities within Wales have entered into an agreement of Legal Duties, The Armed Forces Covenant is in place to ensure that Military personnel are

treated fairly and it is requested the Council give their consideration to the Covenant when reviewing my client's application for approval together with Shaun Stockers achievement of the British Empire Medal for recognition for meritorious military service which is worthy of recognition by the Crown.

Therefore, in my client's case I have demonstrated that this retrospective development meets the exceptional circumstances test as set out in the PPW. The material consideration of this Change of Use application is in conformity and in accordance with National Policy, the Welsh Spacial Plan, Planning Policy Wales, TANS Interim Ministerial Planning Statements which support my client's proposal, including Blesma and Local Authority Duty to Military Needs Clause 6.4.

I therefore consider the above scheme should be afforded full weight as material planning considerations and personal circumstances are significant enough to justify and demonstrate that the proposal is acceptable and would serve to outweigh any apparent perceived concerns that this proposal could be considered to have upon locality, its open countryside location and current Green Barrier designation.