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Our ref: BLF

Dear Sirs

Planning application for material alterations to the external appearance of a building, to facilitate the conversion of the existing five-bay garage to provide additional residential care accommodation, at Hullah Farm, Cefn Road, Abenbury, Wrexham, LL13 9TT

I am instructed to submit the above application for planning permission. Along with the completed planning application forms, please also find accompanying this submission the following plans and information

- 3513-19 – Location Plan
- 3513-10.5 – Site Plan - Existing
- 3513-10A – Site Plan - Approved
- 3513-20 - Existing Elevations
- 3513-45 - Existing Section
- 3513-41 - Existing Floor Plan
- P22001-001D – Site Plan Proposed and access swept path analysis
- P22001-002 - Car park swept path analysis
- 3513-42 - Proposed North and South Elevations
- 3513-43 - Proposed East and West Elevations
- 3513-44 - Proposed Section
- 3513-32 - Proposed Floor Plan

And

- Protected Species [bat] survey by Stephen Cutmore Arboricultural and Ecological Services

1. Introduction

- 1.1 Fairpark Care is a health and social care provider monitored and regulated by the Care Quality Commission (in England). Hullah Farm is their first home in Wales, and an application will soon be made to register it with Arolygiaeth Gofal Cymru (Care Inspectorate Wales).
- 1.2 Fairpark Care delivers integrated care to people with autism and learning disabilities. They specialise in the support of people who present with behaviour defined as challenging.

- 1.3 Fairpark Care have a wealth of experience in supporting people living with autism and learning disabilities. They help the people entrusted to their care to develop independent life skills, to improve communication and to resolve environmental issues (such as noise and lighting) to reduce anxiety. Their aim is for people to self-direct their support as much as possible, to give them a greater sense of control over their own lives. They take lots of time to get to know each person and to understand what does and does not contribute to positive outcomes. They spend time with family members and care professionals close to the individual, to gain an understanding of the challenges the person may have already overcome and their hopes for the short and long term. They employ support techniques which encourage focus and routine, and emphasise the importance of creating calm and ordered environments. They also encourage each person to be part of their local community in whatever way suits them, whether that's getting out and about to do shopping, meeting new friends or taking up a volunteering opportunity.
- 1.4 Fairpark Care are dedicated to providing solution focused care that makes a real and lasting difference to an individual's quality of life. The individual care plans for each person are delivered by bespoke teams. Where required, this commitment includes providing each person with continuous one-on-one, 24/7 support.
- 1.5 Fairpark Care are developing an outstanding service at Hullah Farm, to provide exceptional care and treatment for people with autism and learning disabilities. Working with local adult social care services, the primary role of Hullah Farm is to provide Welsh residents with the care they require, at a place local to their home, family and social connections. In doing so, Hullah Farm supports family and community service involvement, as well as providing local employment opportunities.
- 1.6 Within the overall context of the care home, the conversion of the garage will offer a slightly different type of accommodation to that offered in the Farmhouse and the Cottages. People living with autism and learning disabilities have differing levels of independence. They thrive best in accommodation which provides the best fit to their level of independence. The proposed conversion will both add to the overall level of accommodation available locally to meet the special needs of this group, and will also widen the choice of accommodation available, to better meet the different needs of individuals.

2. Site Description

- 2.1 Hullah Farm lies on the eastern outskirts of Wrexham, on the east side of Cefn Road and almost opposite Hullah Lane. Although close to the built-up area of Wrexham the site feels self-contained, quiet and even mildly secluded.
- 2.2 The site is bordered by well-defined boundaries on its north, east and south sides, and by Cefn Road on its west side. The north and east sides are mix of mature trees and hedgerow. The southeast corner retains some trees and otherwise the southern boundary is defined by a low field hedge.
- 2.3 The land beyond to the north and east is open recreational land and currently is not formally laid out for any particular use, though in the past the land to the east has been used as an athletics track. The land to the south is a large field in agricultural use. Opposite and to the northwest are the grounds to Ysgol Morgan Llwyd, the nearest part of which is set out as a football pitch. The other land to the west is the eastern side of Caia Park, with residential properties overlooking the junction of Hullah Lane and Cefn Road.

2.4 Hullah Farm is comprised of the following buildings

- The farmhouse, a white rendered 4-bed property, adjacent and side on to Cefn Road.
- Terrace Cottages, an L-shaped row of red brick dwellings, sited to the northeast of the farmhouse. Some overlook the lawn in the north east corner of the site.
- Alongside the east elevation of the farmhouse is a single storey brick built building, now providing office space.
- A short distance to the east of the farmhouse is the brick built five-bay garage (the subject of this application).

2.5 The western boundary, to Cefn Road, is demarcated by a low stone wall. There are two points of access. A northern access, which is now closed to vehicular traffic but is open to pedestrians and for taking out bins for refuse collection. A southern access, which is now the means of vehicular access to site. This southern access serves an area of open parking at the eastern end of the cottages, and beyond that the five-bay garage.

3. Proposal

- 3.1 The application seeks planning permission for material alterations to the external appearance of the building, to facilitate the conversion of the five bay garage to provide two additional units of care home accommodation.
- 3.2 The material alterations to the external appearance comprise the replacement of the garage doors on the south elevation with two pedestrian doors and three windows, and to make good the surrounds with brick to match the existing, and on the north elevation to replace three windows with three doors and add two windows either side.
- 3.3 The need of the development for foul drainage will be met by the installation of a package sewage treatment plant under the north east lawn, which will replace the existing septic tank and will serve the whole site.
- 3.4 There will be some minor alterations to the hard standing area to the south of the building, to facilitate its use for the parking and manoeuvring of cars. The proposed car parking arrangements will supersede some of the car parking arrangements approved under planning permission reference 2021/1134.

4. Relevant planning history

- 4.1 Planning permission was granted in May 2022 for the change in use of the site from Class C3 (dwellinghouse) to Class C2 (care home) and material alterations to the external appearance of the existing two-bay garage (Council reference 2021/1134). This permission has been implemented and work to the Farmhouse and Cottages is nearing completion.
- 4.2 The earlier application originally included the proposals for the conversion of the five-bay garage. This element was withdrawn from the earlier application following a request by the Council ecology officer for a bat and bird survey of the building, and comments made by Natural Resources Wales about the proposed means of foul drainage. The bat and bird survey alone would have delayed the decision on the

application by several months. Having regard to the urgent need for the other accommodation, the decision was taken to withdraw the proposed conversion of the five-bay garage, in order to allow the remainder of the scheme to go forward, to obtain permission and to be brought into use as soon as possible.

5. Relevant Planning Policy

- 5.1 The relevant development plan for the area is the Wrexham Unitary Development Plan 1996-2011. The application should be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 5.2 A replacement plan has been in preparation for some years and a draft version is currently at examination. The final report of the Inspectors is awaited. Only limited weight can be given to its draft policies.
- 5.3 No reference to specialist housing provision of the type proposed is to be found in any of the policies in the Unitary Development Plan. Policy H11, on residential and nursing homes, is not relevant because the proposed use does not conform to either of those two models of provision. Nonetheless, it should be noted paragraph 2.1 of the Plan says the Plan reflects the Council's corporate vision for the Borough based on, amongst other things, providing care for the more vulnerable in society.
- 5.4 No specific reference to this proposed form of development is to be found in Planning Policy Wales. Future Wales does offer some recognition, in the section on Managing Growth, Policy 22 (green belts in the north), which requires Wrexham (and others) to ensure (amongst many things) that specialist housing provision is considered and planned for.
- 5.5 Notwithstanding the absence of explicit planning policy support, both Future Wales and the Unitary Development Plan are considered to offer support in principle for the provision of Class C2 care homes of the type proposed in this application.
- 5.6 The Unitary Development Plan does not have a policy which addresses means of disposal of foul sewage. Relevant national policy and guidance is to be found in Planning Policy Wales (Feb 2021), paragraph 6.6.21 (development proposing non-mains drainage) and in Welsh Government Circular 008/2018 (July 2018) on the planning requirement in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants.
- 5.7 The site is located on the boundary of and just within the designated green barrier on the east side of Wrexham. The land opposite the site, on the west side of Cefn Lane, is within the built-up area but the site itself is outside of the settlement limit. Accordingly, the following policies from the Unitary Development Plan are applicable
 - Strategic Policies PS1, PS2, PS3, PS4
 - GDP1 – Development objectives
 - EC1 – Green barriers
 - EC4 – Hedgerows, tree and woodland
 - T8 – Parking.

6. Foul drainage

- 6.1 On the previous application Natural Resources Wales made comments which can be summarised as follows
- The site is within a publicly sewerage area and the development should be connected to the mains sewerage system, unless connection is not feasible.
 - The site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC), wherein any proposed development that might increase the amount of phosphate within a river SAC catchment could lead to damaging effects to the SAC.
- 6.2 With regard to the first point, this application is supported by a statement from Bingham Rawlings Partnership Limited (Appendix BLF-01, to this Planning Statement) and the results of a foul drainage system survey from Wrexham Surveying Services (Appendix BLF-02). The letter from Bingham Rawlings explains how the nearest connection point is on higher ground and therefore a connection is not feasible.
- 6.3 With regard to the second point, the Applicant proposes to instal a package sewage treatment plant. It is proposed that details of the plant can be secured by condition. The intention is to instal a plant which incorporates a system to reduce the amount of phosphate discharged in the effluent. The effluent will then be discharged either to the ground or perhaps to a watercourse. The proposed system will ensure there is no risk of damaging effects to the SAC.
- 6.4 The long term stewardship of the system will be the responsibility of either the site owner or operator. In either case, there will be clear responsibility for the means of operation and maintenance of the plant, to ensure the relevant NRW discharge permit (or relevant exemption conditions) will be met throughout the life of the plant.
- 6.5 The proposal therefore complies with national policy and guidance on non-mains foul drainage and will not pose a risk to the SAC.

7. Ecology

- 7.1 On the previous application the Council ecology officer requested a bat and bird assessment. An inspection of the building has been completed and the results are set out in the accompanying report from Stephen Cutmore Arboricultural and Ecological Services.
- 7.2 The assessment found no bats or evidence of bat activity. Nor did it find evidence of nesting birds.
- 7.3 Notwithstanding those findings, the scope of the proposed works to the building were assessed for the potential to impact bats. The report concludes that, given no work is to be carried out to the roof, there is no foreseen likelihood of disturbance or damage to any bat roosts, if any were present in the roof structure. The works proposed to the interior would have negligible-low impact on bats and would not require supervision by a licensed bat worker. The report finds that there is no need for a derogation licence from NRW.
- 7.4 The development proposals will therefore provide for the conservation of wildlife in accordance with Unitary Development Plan Policy EC4.

8. Other matters

- 8.1 Policy EC1 (green barriers) supports development in the green barrier, if it would maintain the openness of the barrier and does not conflict with the purpose of including land within it. The proposed works will facilitate the re-use an existing building within the existing boundaries of Hullah Farm. There would be no expansion of built form and no enlargement of the overall site area. All proposed parking arrangements can be accommodated within the existing site, on areas which are already hard surfaced. As such, the openness of the green barrier and the purpose of the land being included within it, would both be maintained.
- 8.2 In respect of Policy GDP1 (development objectives) the following in particular should be noted.
- 8.3 The building works proposed will use materials to match the existing building and other buildings on site. No enlargement or rebuilding is necessary. The changes proposed are therefore considered to accord with the character of the site and will ensure it continues to make a positive contribution to the appearance of the nearby locality.
- 8.4 The nearest neighbouring properties are on the west side of Cefn Road, on Hullah Lane. The nearest neighbouring house faces south on to Hullah Lane and has only a blank gable elevation facing Cefn Road and the site. Given this arrangement and the separation distance, the proposed changes would have no impact on the residential amenity of this, or any other neighbour.
- 8.5 Future residents will have access to the enclosed and private communal garden in the northeast corner of the site. Having regard to the existing and proposed patterns of fenestration, each property will retain adequate existing levels of privacy.
- 8.6 The site sits within a 20mph zone on Cefn Road. It has an existing point of vehicular access. The site is also located on a bus route, with the nearest stops opposite on Hullah Lane (just east of the junction with Ernest Parry Road).
- 8.7 There are no proposals to remove any existing trees or hedgerows as part of the proposed development. As such there is no conflict with Policy EC4 (hedgerows, trees and woodland).
- 8.8 Paragraph 10.10 to Policy T8 (parking) sets out that the Council's guidance on parking standards is to ensure development does not affect road safety or local amenity. It recognises that, occasionally, full compliance may neither be practicable or appropriate. The Council Local Planning Guidance Note No.16, on Parking Standards, sets out the maximum amount of car parking appropriate to various uses. The Guidance stipulates that garages are not counted towards on-site parking provision.
- 8.9 The garage has been vacant since the Applicant took possession of the site. The space south of the building has been used for car parking. As part of this application, the latter arrangement will be formalised. This will provide a total of ten spaces, including one suitable for use by those registered disabled.
- 8.10 For the use of the site as a whole (converted garage, farmhouse and cottages) the maximum number of car parking spaces would be calculated as follows

1 space per 2 bed spaces – there would be 10 bed spaces – therefore up to 5 spaces allowed.

1 space per 30sqm gross floor space for Class B1 uses – the proposal includes 37sqm of office space and this is analogous with Class B1 (office) use – therefore up to 2 spaces allowed.

- 8.11 The Council parking standards would suggest there should be no more than 7 seven spaces on site, of which one should be suitable for use by those registered disabled.
- 8.12 The application proposes to provide 9 standard car parking spaces, plus one space suitable for use by the disabled. This higher level is considered to be acceptable because it includes three 'home' vehicles, which are used to ferry residents to other locations. These vehicles need to be based at the site and are additional to and separate from staff and visitor parking.
- 8.13 Alternative modes of travel to the site will be promoted and it should be noted the site has good accessibility to a large resident population, from which it is hoped the majority of the work force can be recruited. For some staff it will be realistic to walk to the site. These are also bus stops close by and provision will be made on site for secure cycle parking.
- 8.14 The scheme will provide cycle parking at a minimum rate of 1 per 10 bedspaces plus 1 per 10 employees. There will be 8 cycle parking spaces in total.
- 8.15 The approach proposed to parking will maintain both road safety and local amenity. Therefore, the proposals comply with UDP Policy T8.

9. Conclusion

- 9.1 The scheme will provide a high quality and supportive residential environment for adults with specialist care needs. It will offer independence and privacy at the same time as care and support. It will help meet the Borough's need for specialist accommodation of this type, to meet the needs of this particular segment of the area's overall demand for housing.
- 9.2 The site lies outside of the defined settlement boundary but the scheme makes use of previously developed brownfield land with no detriment to the green barrier, surrounding countryside, the landscape / townscape character of the immediate area, to any area of open space or to the quality of the natural environment. It will provide an excellent residential environment for the proposed residents, with no impact on existing neighbours. Adequate means of access are existing and parking will be provided consistent with the operational needs of the use and the Council policy on parking.
- 9.3 It is not practicable to connect the site to mains foul drainage. A suitable on site solution can be delivered which will not exacerbate pollution of the SAC.
- 9.4 The building has been inspected for the presence of bats and birds and none were found. Notwithstanding that, the scope of the works proposed would have negligible to low impact on bats if any were present in the roof structure.
- 9.5 As such the proposed development is in overall compliance with the Strategic and other policies of the Unitary Development Plan. Accordingly, the Council is respectfully requested to grant planning permission.

Yours sincerely

A handwritten signature in black ink that reads "Adrian Thompson". The signature is written in a cursive, flowing style.

Adrian Thompson MRTPI
Director, Lightwater TPC



RTPI

Chartered Town Planner