

**LAND AT LOWER HONKLEY FARM
STRINGERS LANE
BURTON ROSSETT
WREXHAM
LL12 0AP**

**PROPOSED RESIDENTIAL DEVELOPMENT OF 5 NO. DWELLINGS, ACCESS,
CAR PARKING, LANDSCAPING, DRAINAGE AND ASSOCIATED
ENGINEERING WORKS**

PLANNING PORTAL REF. PP-06739379

PLANNINGSTATEMENT

APRIL 2018



Geraint John Planning

CONTENTS

Executive Summary

Chapter 1 Introduction

Chapter 2 Site and Surroundings

Chapter 3 Development Proposals

Chapter 4 Planning Policy Context

Chapter 5 Material Considerations

Chapter 6 Summary and Conclusions

EXECUTIVE SUMMARY

This Planning Statement has been prepared on behalf of Nigel Darlington, in support of a full planning application on land at Lower Honkley Farm, Burton Rossett, Wrexham. The description of development is as follows:

"Proposed residential development of 5 no. dwellings, access, car parking, landscaping, drainage and associated engineering works."

This Planning Statement confirms that, on the basis of a comprehensive review of both the policy and physical context of the application site, the site is considered to be suitable for development and the proposals should be viewed favourably for the following reasons:

- The proposed development would be well within the scale of the previous footprint of the former industrial buildings at the site and represents only a small proportion of the previously developed area. As such, the proposed development should be regarded as being acceptable within the context of the footprint of previously built development at the site;
- A Valuation and Appraisal Report of the proposed development has confirmed that the scheme would protect the long term future of the Grade II listed building;
- The proposed development would achieve the objectives of enabling development as set out by the Conservation Principles;
- The proposed development would significantly enhance the setting of the listed Lower Honkley Farmhouse and general views of the countryside in and around the site;
- The site can be appropriately accessed and the required visibility splays can be achieved at the site. Adequate car parking can also be accommodated on site;
- The proposed development complies with all relevant aspects of national and local planning policy;
- Suitable mitigation measures are proposed to ensure that the proposed development is acceptable from a biodiversity impact perspective;
- The previously approved scheme was recognised as being sympathetically designed to significantly enhance the setting of the farmhouse. The current proposal has further enhanced aspects of the approved scheme to ensure that the Listed Building's historic integrity and identity is fully respected.

In conclusion, there are no technical constraints to the redevelopment of this site. The Local Planning Authority has confirmed that permission P/2002/1333 remains extant and therefore the principle of residential development at the site is considered to be acceptable and established. Accordingly, the planning application should be considered favourably by the local planning authority and planning permission granted for proposed development.

1.0 INTRODUCTION

Background

- 1.1 This Planning Statement has been prepared on behalf of Nigel Darlington, in support of a full planning application on land at Lower Honkley Farm, Burton Rossett, Wrexham. The description of development is as follows:

"Proposed residential development of 5 no. dwellings, access, car parking, landscaping, drainage and associated engineering works."

Information Submitted in Support of the Application

- 1.2 The following information has been prepared in support of the planning application:

- Planning Application Form
- Site Location Plan: 5371-101 Rev A
- Proposed Site Plan: 5371-102 Rev X
- Proposed Floor Plans: 5371-103 Rev A;
- Proposed Elevations: 5371-104 Rev A;
- Proposed Garage Plans: 5371-105 Rev X
- Phase 1 Extended Habitat Survey, January 2017, by Marches Ecology;
- Walkover Survey, January 2018, by Marches Ecology;
- Tree Report by Canopy;
- **Confidential** Valuation and Appraisal Report, by LegatOwen;

- 1.3 **Please note the Valuation and Appraisal Report by LegatOwen is provided to the Council on a PRIVATE AND CONFIDENTIAL basis, as it contains sensitive financial information, and should not be uploaded to the Council's website or made available for public viewing.**

- 1.4 As the proposed development does not constitute major development, a Design and Access Statement is not required. Similarly, as the application is not major development, Pre-Application Consultation on the application is not required.

Purpose and Structure of this Statement

- 1.5 This Statement outlines the context within which the application is made, and provides a detailed examination of the main planning considerations raised by the proposals. The Statement also sets out reasoned justification in support of the proposed development. The statement is structured as follows:
- **Section 2** provides a description of the characteristics of the site and surrounding area, and details regarding the planning history of the site;
 - **Section 3** provides details of the development proposals;
 - **Section 4** outlines the relevant planning policy framework in relation to the site and the development;
 - **Section 5** analyses the key material considerations arising from the proposed development (in light of the planning policy context and discussions with the Local Planning Authority);
 - **Section 6** sets out the main findings and conclusions.

2.0 SITE AND SURROUNDINGS

- 2.1 A comprehensive site analysis has been undertaken. The characteristics of the locality have been considered including relevant planning history and the existing built form of the area.

Site Context

- 2.2 The site is situated on the northern side of Stringer's Lane in the community area of Burton Rossett near Wrexham. Lower Honkley Farm, a Grade II listed former farmhouse and its associated access and garage immediately adjoins the western boundary of the site. Lower Honkley Farm was previously derelict, but has been extensively restored and refurbished by the Applicant. The farmhouse is now occupied as a dwelling. The building remains in the ownership of the Applicant, but is leased to a tenant. The photographs below illustrate the condition of the building before and after restoration.



Historic Views of the Site, Illustrating the Extent of Dilapidation of the Grade II Listed Building at Lower Honkley Farm



Views of Lower Honkley Farm following Restoration

- 2.3 A number of residential properties are situated immediately to the south of the site including Cherry Tree Cottage and a sizeable cluster of dwellings at Honkley Hall Cottages. A pair of semi-detached properties are situated a short distance along Stringer's Lane to the north of the site. Burton Lodge Farm and Honkley Hall, plus associated farm and outbuildings are located further to the north.



Cherry Tree Cottage



Honkley Hall Cottages



Site Location and Description

- 2.4 The location of the site is illustrated on the aerial view and map extract below.



Aerial View of the Site (Site Approximately indicated in Red)

- 2.5 The site is approximately 0.42 hectares (1.04 acres) in extent and is in the ownership of the applicant. An extract of the title plan (CYM387030) for the site is provided below. The Applicant also owns or controls the land to the north and south of the application site.

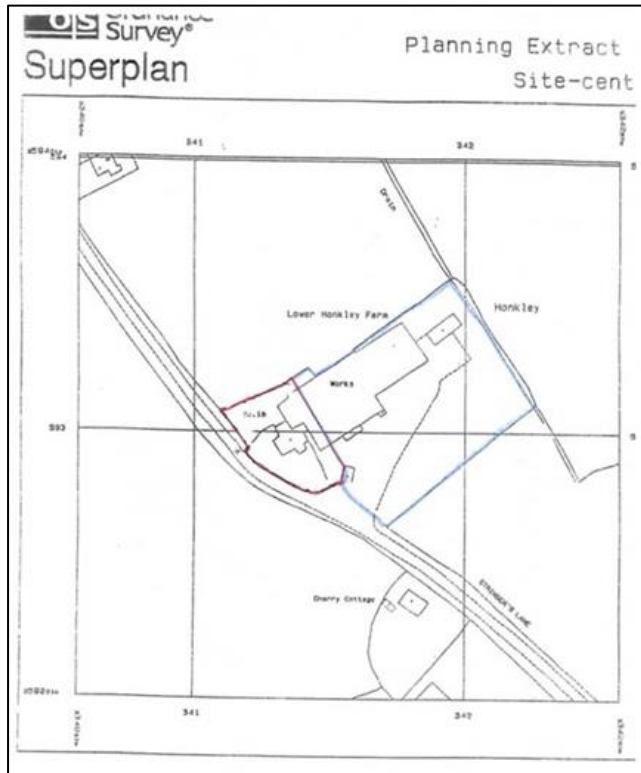


Title Plan Extract

- 2.6 The site is predominantly flat and comprises the site of the former Lower Honkley Engineering and Marine works, which the Applicant advises operated at the site since the 1950s until the business went bankrupt in the late 1990s. The buildings were subsequently leased to Kingcrete Concrete Products. The industrial buildings associated with the works were demolished for safety reasons and in accordance with planning permission P/2002/1333 for the demolition of redundant industrial unit and erection of 3 residential units. Rubble mounds associated with the demolition of the buildings are still present on site. In addition, two sheds remain on site

in the northern corner and along the frontage with Stringers Lane. Given the former industrial use of the site, it is considered that the site comprises previously developed land.

- 2.7 The Ordnance Survey Plan extract below clearly illustrates the extent of the former industrial buildings. These extended from the listed farmhouse north-eastwards along the site, occupying the majority of this part of the site.



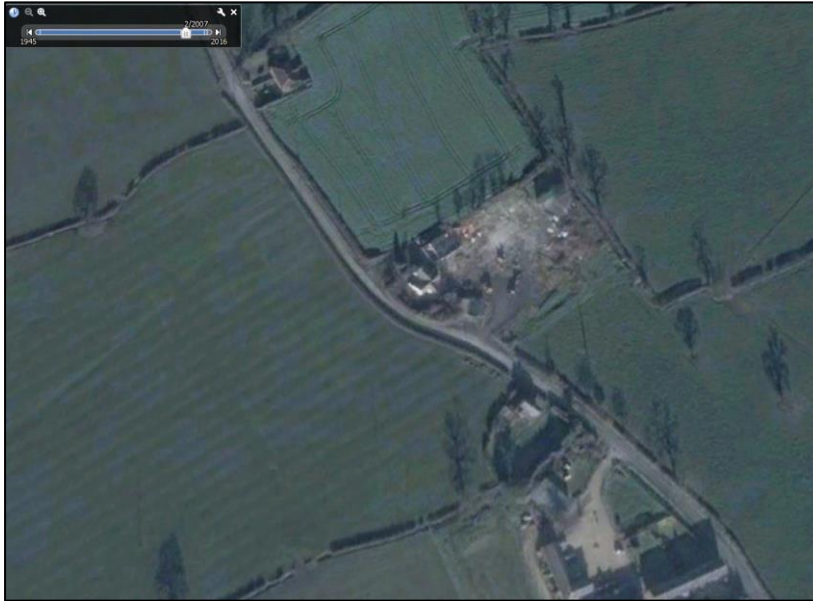
- 2.9 Google Earth images provided below, demonstrate that the industrial units were present on site in 2005 and 2006. The Google Earth image dated 2007 shows the partial demolition of the industrial units and the image from 2009 illustrates that the site had been predominantly cleared at this time.



Google Earth Image Dated 2005 Illustrating the Presence of Industrial Units on Site.



Google Earth Image Dated 2006 Illustrating the Presence of Industrial Units on Site.



Google Earth Image Dated 2007 Illustrating the Partial Demolition of the Industrial Units on Site.



Google Earth Image Dated 2009 Illustrating the Demolition of the Industrial Units on Site.

Site Planning History

- 2.10 An online search of the Wrexham County Borough Council planning register has been undertaken. Relevant planning history at the site is detailed below:

Ref	Description	Decision	Date
P/2017/0072	Erection of 5 dwellings	Refused	25.04.2017
P/2015/0045	Listed Building Consent for Repair of Defective Oak Beam, Reinstatement Of Oak Window Lintols and Installation of Slimlite Glazing Units	Approved	23.01.2015

Ref	Description	Decision	Date
	and Other Alterations, I.E. Use of Stitching Bars		
P/2014/0589	Listed Building Consent to Install Internal Wall / Roof Insulation	Approved	07.08.2014
P/2009/0952	Listed Building Consent For Repair And Refurbishment	Approved	19.11.2009
P/2009/0902	Refurbishment Of Farmhouse And Erection Of New Garden Wall/Fence	Withdrawn	
P/2009/0562	Listed Building Consent For Refurbishment Of Farm House	Withdrawn	
P/2008/0135	Residential Development For 5 No Two Storey Detached Dwellings With Detached Garage	Refused	08.02.2008
P/2008/0126	Listed Building Consent for Refurbishment Of Farmhouse	Refused	07.02.2008
P/2002/1333	Demolition of redundant industrial unit and erection of 3 residential units	Approved	10.01.2005

2.11 The most relevant decisions to the current application at the site are:

- P/2017/0072 Erection of 5 dwellings; and
- P/2002/1333 Demolition of redundant industrial unit and erection of 3 residential units.

P/2017/0072 Erection of 5 dwellings

2.12 The most recent decision relevant to the site is P/2017/0072 for the erection of 5 dwellings, which was refused by Wrexham County Borough Council on 25 April 2017. The application was refused by the Council for the following reasons:

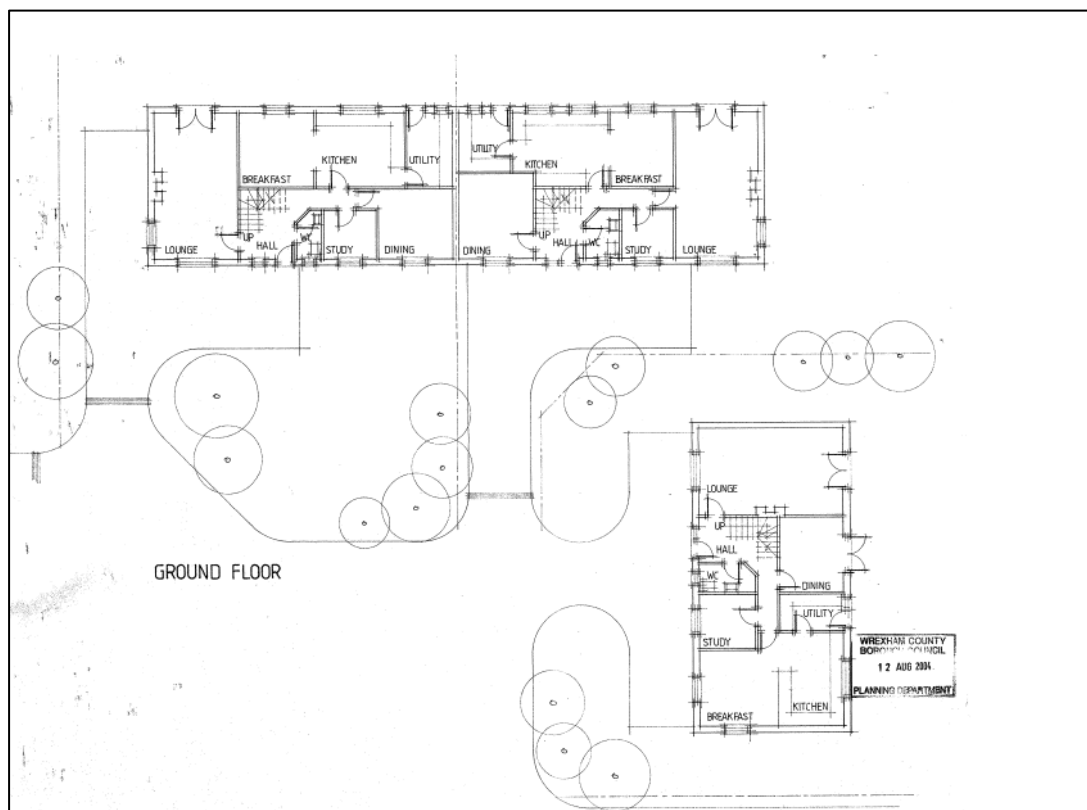
- "1. *The site is located outside any settlement limit as defined in the Wrexham Unitary Development Plan and despite an extant planning permission P/2002/1333 covering part of the site, the proposal would inappropriately extend new built development at this location. The scheme submitted provides no justification as to why an exception to the adopted settlement/housing policies of the Wrexham Unitary Development Plan should be made and to allow the proposal would be contrary to policies PS1, PS2, GDP1 (e and k) and H5 of the Wrexham Unitary Development Plan.*
2. *By virtue of its unsustainable location outside and divorced from any settlement and local facilities the development would be isolated in the rural landscape. The site approached by means of narrow lanes which are substandard in width and devoid of footways or lighting to the detriment of the safety of pedestrians/cyclists and would be unlikely to be a site which encourage alternative means of travel to the car. To allow the proposal would be contrary to policies PS1 and PS4 of the Wrexham Unitary Development Plan. (sic)*

3. *The proposed development extends beyond the previously approved residential area Ref P/2002/1333 and would further encroach into adjoining open countryside, a designated Green Barrier, detrimentally affecting the open character of the area. To allow the development would be contrary to policies PS2, EC1 and GDP1(a) of the Wrexham Unitary Development Plan.*
4. *The proposed development lies adjacent to a Listed Building and the layout, form and scale of the development will harm its setting. To allow the development would be contrary to policy EC9 of the Wrexham Unitary Development Plan."*

- 2.13 Reasons 3 and 4 were added to the decision notice following an Addendum to the Planning Officer's report.
- 2.14 The reasons for refusal for the development of five dwellings at the site will be considered in detail in Section 5 'Material Considerations' of this Statement.

P2002/1333 Demolition of Redundant Industrial Unit and Erection of 3 Residential Units

- 2.15 Full planning permission for the demolition of a redundant industrial unit and erection of 3 residential units was granted by the Council on 10 January 2005. A copy of the approved plan for application ref. P2002/1333 is provided below:



Extract from Application Ref. P2002/1333

- 2.16 In granting planning permission for three dwellings at the site, the Report of the Chief Planning Officer, dated 10.01.2005, stated that,

"Given the predominantly rural character of the area; the location of the site within a green barrier; the undesirability of intensifying any industrial uses; the present of a Listed farmhouse; and the fact that Stringers Lane is not suitable for frequent commercial traffic, the introduction of three new dwellings can be justified as an exception to the usual presumption against new housing in the countryside."

- 2.17 The Council has confirmed, in its decision notice for P/2017/0072, that the planning permission for P/2002/1333 is extant.

Designations

Heritage

- 2.18 Lower Honkley Farmhouse is a Grade II listed building and immediately adjoins the site to the west. The current application does not include the listed building and relates solely to the adjoining previously developed land.

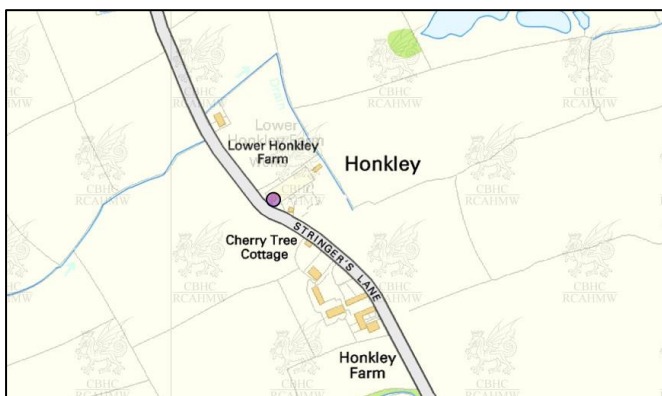
- 2.19 The listing details describe the building as a sub-medieval cruck-framed house with late C18/early C19 additions. The exterior of the building is described as:

"Single-storey and attic timber-framed dwelling externally rebuilt in stone and brick with stone plinth. Pitched slate roof. Cross-shaped plan with sub-medieval section to central axis, and possibly southern porch projection. Northern section is brick with dentilated cornice. Catslide roof to northern section of projecting western bay. New hardwood doors and windows c1995."

- 2.20 The interior of the building is described as:

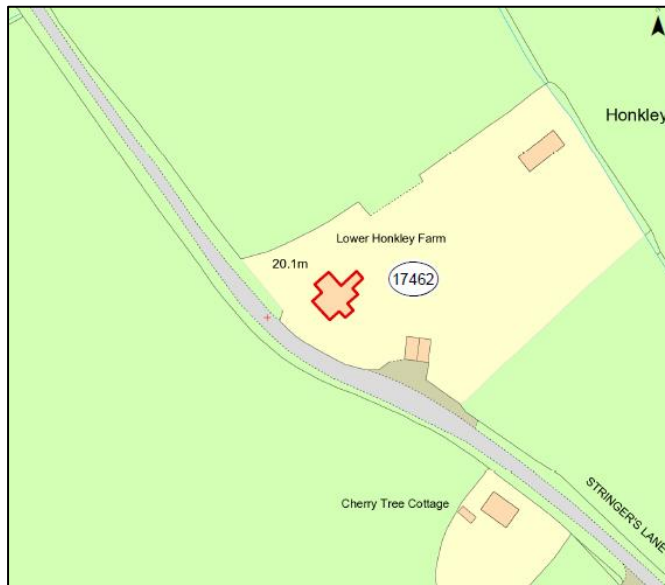
"Entrance from south into single bay with exposed wattle-and-daub partition wall set into box-frame timber structure. Wattle-and-daub protected under glazed frame. Central bay gives onto room with lower floor to east with large open fire constructed with stone side-walls and bevelled wooden lintel. To the north small spreading stone steps lead down into further room with stone fireplace. Floor joists and heavy bevelled beams exposed throughout. To the second floor evidence of three bay cruck with top brace and heavy timber side purlins. Middle cruck has no infill above top brace to allow increased light and ventilation. Wide floor boards and dog-leg staircase."

- 2.21 An extract from the Historic Wales website, indicating the location of the listed building is provided below.



Historic Wales Map Extract

2.22 A plan illustrating the location of the listed building is provided below.



Lower Honkley Farmhouse Listed Building – Cadw

2.23 The site is not located in a Conservation Area and there are no Scheduled Monuments in the immediate vicinity of the site. The nearest National Monument Record (NMR) to the site is Honkley Hall, Kinnerton, which is noted on the NMR as a post mediaeval record.

Landscape and Environmental Designations

2.24 The site is located within a Green Barrier designation, as defined in the adopted Wrexham Unitary Development Plan (UDP), but is not subject to any environmental designations. There are no Tree Preservation Orders (TPOs) at the site. A tree report on the site has been undertaken and has confirmed that four trees would be lost as a result of the proposed development. However, the trees to be removed are mostly scrub Willow and are considered to be of no real intrinsic value.

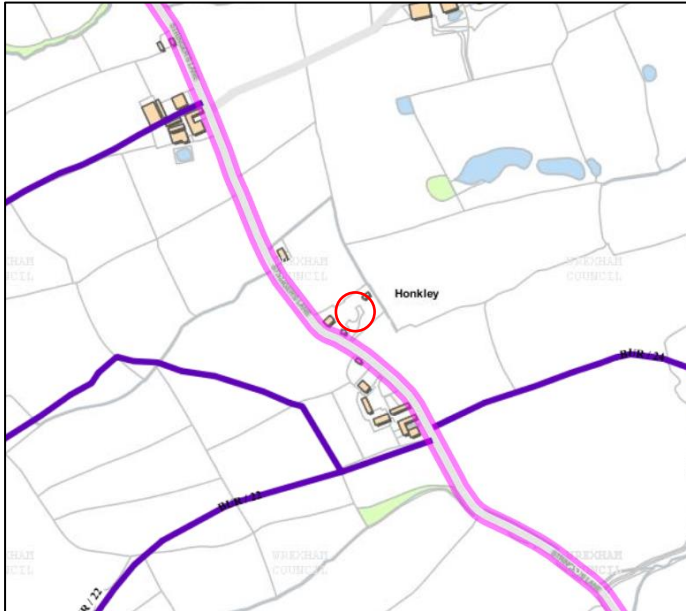
LANDMAP

2.25 The site lies within the Dee Terraces (Area 13c) LANDMAP character area. The area forms part of the Wrexham lowlands. The cultural character of the area is also described as follows:

- Attractive rural villages of Rossett and Holt, popular with commuters;
- Part of wider Welsh Maelor cultural area, with declining role of traditional agricultural land uses and increasing commuter influence; and
- Easily accessible area strongly affected by transport routes

Public Rights of Way

- 2.26 There are no Public Rights of Way (PRoW) at the application site. However, there are a number of PRoWs in the area off Stringers Lane, as shown on the Definitive Map extract below:



Extract from the Definitive Map (Pink denotes location of Stringers Lane)

Flood Risk

- 2.27 The Natural Resources Wales (NRW) development advice map (DAM) confirms that the site is predominantly not at risk of flooding. A copy of the DAM plan for the area is provided below:



Extract from the DAM Flood Risk Map for the Area.

Ecology

- 2.28 An Extended Phase 1 Habitat Survey of the site has been prepared by Marches Ecology. The report confirmed that the site comprised the following habitats:
- Mosaic of disturbed semi-improved neutral grassland/ ephemeral vegetation/ bare ground;
 - Unimproved/ semi-improved neutral grassland;
 - Scattered scrub/ tree saplings;
 - A ditch that has been enclosed within a pipe;
 - Two hedgerows
 - A number of trees within the hedgerows including mature specimens
 - Small stands of tall ruderals; and
 - Two built structures.
- 2.29 Due to the nature of the site, the habitats were considered to be of site value and only the two hedgerows and four trees were considered to be of local value. No particular mitigation/ compensation measures were proposed other than standard avoidance measures. No evidence of badgers was found at the site. A recent walkover survey of the site, undertaken in January 2018, confirmed that there were no material changes at the site. No evidence of badgers was found at the site in the follow-up walkover survey. Further details are provided in the Phase 1 Extended Habitat Survey and follow-up walkover survey, which accompany the planning application as separate documents.

3.0 DEVELOPMENT PROPOSALS

Planning Application Scope

- 3.1 The description of development is as follows:

"Proposed residential development of 5 no. dwellings, access, car parking, landscaping, drainage and associated engineering works."

Proposed Site Layout

- 3.2 The proposed layout for the site is provided below. The site plan indicates the outline of the demolished commercial units which previously stood at the site, shown in blue dotted line. The outline of the approved residential scheme granted under application reference: P/2002/1333 is shown as a purple dotted purple line.



Proposed Site Layout

Design Considerations

- 3.3 The proposed development comprises five dwellings and associated car parking, including oak framed garage structure. The proposed dwellings would be one and half storeys in scale, set within the site in an L-shape courtyard style arrangement. Each of the properties would be 3 bedroom dwellings, with a driftway provided at ground floor between units 3 and 4 and a bedroom serving unit 4 above.

Design Statement

- 3.4 The proposal involves the erection of five properties arranged in a courtyard development on land off Stringers Lane. It also proposes the erection of an oak framed garage complex with bin storage connected and parking area for the proposed residential development. The existing hedge would be replanted behind a new visibility splay in each direction. The existing access off Stringers Lane would be used to serve the new residential development.
- 3.5 The dwellings would comprise 3 bedrooms properties which have been designed to reflect the character of the original listed cottage and the surrounding barns, noticeably the barn conversion 200 metres away on Stringers Lane. This scheme has also been designed to meet appropriate separation distances and to avoid any harm by way of overlooking to adjoining property. The dwellings ridge height is set lower than that of the adjacent listed building and recently built oak frame garage. The low roof design provides room in the loft accommodation to the first floor. The ground floor accommodation is laid out around a central circulation zone, living room to one direction and kitchen and dining space to the opposite.
- 3.6 The external materials chosen for the scheme, match that of the local area and would be as follows:
- Facing brick to the external walls.
 - Slate roof finish.
 - Painted timber doors and windows.
 - Heritage style rain water goods.
- 3.7 The garage design include an exposed oak frame to the front elevation and open bay arrangement, the side and rear will be clad in horizontal timber boarding to soften the impact of the structure the open countryside. The rainwater goods will match the proposed dwellings with heritage style finish.
- 3.8 The boundary treatment to the site will be post and rail fence to retain the open country side, with new hedges planted to perimeter of the site. The curtilage of each property will be separated with 1200mm high facing brick boundary walls.
- 3.9 The proposed site layout plan shows how the dwelling would sit comfortably within the site and are of a scale consistent with the other properties in the immediate vicinity.

Proposed House Types

- 3.10 Elevations for the house types proposed for the scheme are illustrated on the following drawings:
- Drawing no. 5371.03 Rev A – Proposed Floor Plans
 - Drawing no. 5371.04 Rev A – Proposed Elevations;
- 3.11 The proposed dwellings would comprise the following:

House Type	Size	Number
Plots 1-5	3 bedrooms	5



Proposed South-East Elevation (Principal Elevations Units 1 to 3)



Proposed North-West Elevation (Rear Elevations Units 1 to 3)



Proposed South-West Elevation (Principal Elevations Units 4 to 5)



Proposed North-East Elevation (Rear Elevations Units 4 to 5 & Side Elevation Unit 3)

Access and Parking

- 3.12 Access to the site would be via Stringers Lane. An area of car parking would be provided set around a central area of open space and planting. This feature would also facilitate vehicle circulation around the site. This would enable vehicles to enter and leave the site in a forward gear. The courtyard area would comprise Marshalls York Stone paving. A detached garage would be erected along the southern boundary providing 5 parking spaces, one allocated to each dwelling. An additional parking space would be provided in front of each dwelling within the site, giving each dwelling 2 off-street parking spaces. Car parking is provided at a level that is compliant with the Council's approved standards.

Landscaping

- 3.13 A new hedgerow is proposed to supplement the existing hedgerow feature at the site, comprising:
- 40% Hawthorn;
 - 30% Hazel;
 - 10% Blackthorn;
 - 10% Field Maple; and
 - 10% Holly.
- 3.14 Trees on the site would be retained as far as practicable. The only trees to be removed are of low value.

4.0 PLANNING POLICY CONTEXT

- 4.1 This section of the Planning Statement provides a summary of the relevant planning policy framework in relation to the site and the proposed development.
- 4.2 The key planning policy documents of relevance to the determination of the application are outlined below. A detailed assessment of the proposed development in relation to relevant planning policies is provided in Section 5 Material Considerations.

National Planning Policy

- 4.3 The following policy/guidance documents prepared at the national (Welsh Government) level are of relevance to the determination of the application.

Wales Spatial Plan

- 4.4 People, Places, Futures The Wales Spatial Plan (WSP) Update 2008 was approved by the National Assembly for Wales in July 2008. The Wales Spatial Plan aims to deliver sustainable development through its area strategies in the context of the Welsh Government's Sustainable Development Scheme and sets out cross-cutting national spatial priorities. The site lies within the North East Wales Border and Coast region. The Wrexham/Mold/Deeside/Chester area is identified as a strategic hub with a priority for sustainable development in this cross border area. In particular, Paragraph 16.55 of the WSP states that it is particularly important for North East Wales to offer a very high quality environment with a unique sense of place where people will want to live, work and play.

Planning Policy Wales (9th Edition, November 2016)

- 4.5 Planning Policy Wales (PPW) forms the overarching national planning policy document for Wales and sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs). PPW provides guidance on a range of land use planning matters. Relevant aspects of PPW to the proposed development are summarised as follows:

Sustainable Development

- 4.6 The Welsh Government has a statutory duty in relation to sustainable development as set out in Paragraph 4.1.2 of PPW. The planning system also provides for a presumption in favour of sustainable development (Paragraph 4.2.2). Paragraph 4.4.3 sets out a series of objectives which development proposals should seek to achieve. The following objectives are of relevance to the proposed development:
- Promote resource-efficient and climate change resilient settlement patterns that minimise land-take (and especially extensions to the area of impermeable surfaces) and urban sprawl;
 - Play an appropriate role in securing the provision of infrastructure to form the physical basis for sustainable communities including water supplies, sewerage and other infrastructure;
 - Ensure that development does not produce irreversible harmful effects on the natural environment and support measures that allow the natural heritage to adapt to the effects of climate change;
 - Promote access to employment, shopping, education, health, community, leisure and sports facilities and open and green space, maximising opportunities for community development and social welfare;

- Locate developments so as to minimise the demand for travel, especially by private car;
- Ensure that all local communities – both urban and rural – have sufficient good quality housing for their needs, including affordable housing for local needs, in safe neighbourhoods; and
- Foster social inclusion by ensuring that full advantage is taken of the opportunities to secure a more accessible environment for everyone that the development of land and buildings provides. This includes helping to ensure that development is accessible by means other than the private car.

4.7 Figure 4.4 of PPW provides a definition of previously developed land. It defined previously developed land as,

"that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure."

4.8 Although the industrial buildings at the site have been demolished, it is considered that the site still falls within the definition of previously developed land. Evidence of spoil from the demolition is still present on site and two sheds remain on site. The site has not naturally re-vegetated and there is no nature conservation value of note. As such, it is clear that the site still comprises previously developed land.

4.9 Paragraph 4.5.1 of PPW notes that tackling climate change is a fundamental part of delivering sustainable development. PPW also notes the importance of planning for the consequences of climate change (Paragraph 4.5.8), including reducing the vulnerability of the natural environment and built environment to climate change. In this respect, Paragraphs 4.12.2 and 4.12.3 of PPW confirm that development proposals must mitigate the causes of, provide effective adaptation to and resilience against the current and predicted future effects of climate change, for example by incorporating green space to provide shading and sustainable drainage systems to reduce run-off.

Good Design

4.10 PPW also seeks to promote sustainability through good design. Paragraphs 4.11.1 and 4.11.2 of PPW provide the following definition of design:

"Design is taken to mean the relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings."

Good design can protect and enhance environmental quality, consider the impact of climate change on generations to come, help to attract business and investment, promote social inclusion and improve the quality of life..."

4.11 Paragraphs 4.11.4 – 4.11.12 provide guidance on the requirements of good design. These include:

- Inclusive and accessible design;
- Promoting the efficient use of resources including land;
- Tackling the causes and providing effective adaptation to the effects of climate change;
- Offering high environmental quality, including open and green spaces; and
- The visual appearance of proposed development, its scale and its relationship to its surroundings and context are material planning considerations. Local planning authorities should reject poor building and contextual designs. However, they should not attempt to

impose a particular architectural taste or style arbitrarily and should avoid inhibiting opportunities for innovative design solutions;

Natural Heritage

- 4.12 Chapter 5 of PPW sets out the Welsh Government objectives and guidance on natural heritage. Relevant objectives include promoting the conservation of landscape and biodiversity, in particular the conservation of native wildlife and habitats and safeguarding protected species.
- 4.13 Paragraph 5.1.3 of PPW notes that a key role of the planning system is to ensure that society's land requirements are met in ways which do not impose unnecessary constraints on development whilst ensuring that all reasonable steps are taken to safeguard or enhance the environment. It further notes that conservation and development can often be fully integrated. With careful planning and design, not only can the potential for conflict be minimised, but new opportunities for sustainable development can also be created. Paragraph 5.1.4 notes the importance of biodiversity and landscape considerations being taken into account at an early stage in development management. Paragraph 5.5.1 notes that in the interests of achieving sustainable development it is important to balance conservation objectives with the wider economic needs of local businesses and communities. Where development does occur it is important to ensure that all reasonable steps are taken to safeguard or enhance the environmental quality of land.

Transport

- 4.14 In terms of transport, Paragraph 8.1.4 of PPW states that the Welsh Government supports a transport hierarchy in relation to new development that establishes priorities in such a way that, wherever possible, they are accessible in the first instance by walking and cycling, then by public transport and then finally by private motor vehicles. In particular, Paragraph 8.1.5 of PPW notes that land use planning can help to achieve the Welsh Government's objectives for transport through: reducing the need to travel, especially by private car, by locating development where there is good access by walking, cycling and public transport.

Housing

- 4.15 With regard to housing, Paragraph 9.1.1 states that the Welsh Government will seek to ensure that:
- new housing and residential environments are well designed; and
 - the overall result of new housing development in villages, towns or edge of settlement is a mix of affordable and market housing that retains and, where practical, enhances important landscape and wildlife features in the development.
- 4.16 Paragraph 9.1.2 of PPW states that local planning authorities should promote sustainable residential environments, avoid large housing areas of monotonous character and make appropriate provision for affordable housing. Local planning authorities should promote:
- mixed tenure communities;
 - development that is easily accessible by walking, cycling and public transport;
 - attractive landscapes around dwellings, with usable open space and regard for biodiversity, nature conservation and flood risk;
 - greater emphasis on quality, good design and the creation of places to live that are safe and attractive; and
 - the most efficient use of land;

- 4.17 New housing developments should be well integrated with and connected to the existing pattern of settlements (Paragraph 9.3.1). Paragraph 9.3.4 states that, local planning authorities should ensure that the proposed development does not damage an area's character and amenity and that high quality design and landscaping standards are particularly important to enable high density developments to fit into existing residential areas.

The Historic Environment

- 4.18 Chapter 6 of PPW provides national planning policy on the historic environment. Paragraph 6.2.1 states that it is important that the historic environment is protected, managed and conserved. The Welsh Government's objectives are to:

- conserve and enhance the historic environment, which is a finite and non-renewable resource and a vital and integral part of the historical and cultural identity of Wales;
- recognise its contribution to economic vitality and culture, civic pride, local distinctiveness and the quality of Welsh life, and its importance as a resource to be maintained for future generations; and
- base decisions on an understanding of the significance of Wales' historic assets.

- 4.19 Paragraph 6.5.11 of PPW states that there should be a general presumption in favour of the preservation of a listed building and its setting, which might extend beyond its curtilage. For any development proposal affecting a listed building or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability of preserving the building, its setting or any features of special architectural or historic interest which it possesses. It further states that the application of development and listed building controls should recognise the need for flexibility where new uses have to be considered in order to secure a building's survival or provide it with a sound economic future.

- 4.20 Paragraph 6.5.29 of PPW refers to enabling development. It states that enabling development can deliver substantial heritage benefit that would be contrary to other objectives of national or local planning policy. Such development may be appropriate if the public benefit of rescuing, enhancing, or even endowing an important historic asset decisively outweighs the harm to other material interests. Tests setting out when enabling development might be acceptable are given in Cadw's Conservation Principles. Enabling development must always be in proportion to the public benefit it offers. Paragraph 6.5.30 states that when considering a scheme of enabling development, planning permission should be granted only if:

- the impact of the development was precisely defined in the application at the outset, and normally through the granting of full, rather than outline, planning permission;
- the achievement of the heritage objective is securely and enforceably linked to the enabling development;
- the place concerned is repaired to an agreed standard, or the funds to do so are made available, as early as possible in the course of the enabling development, ideally at the outset and certainly before completion or occupation of the enabling development; and
- the local planning authority closely monitors implementation, if necessary acting promptly to ensure that obligations are fulfilled.

Technical Advice Notes

- 4.21 TANs supplement the policy principles of PPW. TANs, which are considered relevant to the proposal, and should therefore be given weight are:

TAN	Title
TAN 1	Joint Housing Land Availability Studies (2015)

TAN	Title
TAN 5	Nature Conservation and Planning (2009)
TAN 6	Planning for Sustainable Rural Communities (2010)
TAN 12	Design (2016)
TAN 18	Transport (2007)
TAN 24	The Historic Environment (2017)

TAN 1: Joint Housing Land Availability Studies (2015)

- 4.22 TAN 1 refers to joint housing land availability studies (JHLAS) and the requirement for local planning authorities to maintain a 5 year housing land supply.
- 4.23 TAN 1 sets out how an authority must act when it does not have a 5-year land supply. It states that, *"where shortfall in the housing land supply is identified the local planning authority should consider the reasons for the shortfall and whether the LDP should be reviewed either in whole or in part"* (Paragraph 6.1).
- 4.24 Furthermore, Para 6.2 notes that the housing land supply figure should also be treated as a material consideration in determining planning applications for housing. It states that, *"Where the current study shows a land supply below the 5-year requirement or where the local planning authority has been unable to undertake a study, the need to increase supply should be given considerable weight when dealing with planning applications provided that the development would otherwise comply with development plan and national planning policies."*

TAN 5: Nature Conservation and Planning (2009)

- 4.25 TAN 5 provides guidance on how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It provides advice on areas including the key principles of positive planning for nature conservation.

TAN 6: Planning for Sustainable Rural Communities (2010)

- 4.26 Paragraph 2.1.1 of TAN 6 states that the planning system has a key role to play in supporting the delivery of sustainable rural communities. It can help to ensure that appropriate development takes place in the right place at the right time by making sufficient land available to provide homes and employment opportunities for local people, helping to sustain rural services.

TAN 12: Design (2016)

- 4.27 TAN 12 provides guidance on how good design should be achieved through the planning process. TAN 12 is considered in detail in the Design and Access Statement (DAS), which accompanies the planning application and is not considered further in this Planning Statement.

TAN 18: Transport (2007)

- 4.28 TAN 18 describes how to integrate land use and transport planning. It includes advice on transport related issues when planning for new development including integration between land use planning and transport, location of development, parking and the design of development. Paragraph 3.3 of the TAN states that the location of new residential development has a significant influence on travel patterns as the majority of trips start or finish at home.

Technical Advice Note (TAN) 24 – The Historic Environment (2017)

- 4.29 TAN 24 provides comprehensive guidance on the historic environment in Wales. Paragraph 1.25 of the TAN states that the setting of an historic asset includes the surroundings in which it is understood, experienced, and appreciated embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. Setting is not a historic asset in its own right but has value derived from how different elements may contribute to the significance of a historic asset. Paragraph 1.28 states that there will be cases where a proposed development will enhance the setting of a historic asset and this will be treated as a benefit resulting from the development. Mitigation of damaging effects could be achieved through good design and in some cases screening or landscaping. A judgement has to be made by the consenting authority, on a case-by-case basis, over whether a proposed development may be damaging to the setting of the historic asset, or may enhance or have a neutral impact on the setting by the removal of existing inappropriate development or land use (Paragraph 1.29).
- 4.30 Paragraph 1.8 notes of TAN 24 states that changes in the historic environment are inevitable. This can be the result of decay caused by natural processes, damage caused by wear and tear of use, and the need to respond to social, cultural, economic and technological changes.
- 4.31 Paragraph 1.28 acknowledges that there will be cases where a proposed development will enhance the setting of a historic asset and this will be treated as a benefit resulting from the development. Mitigation of damaging effects could be achieved through good design and in some cases screening or landscaping.

The Conservation Principles for the Sustainable Management of the Historic Environment in Wales

- 4.32 The Conservation Principles for the Sustainable Management of the Historic Environment in Wales (2011) (Conservation Principles) provide the basis upon which Cadw discharges certain statutory duties on behalf of the Welsh Ministers. The aim of the Conservation Principles is to help reconcile the protection of the historic environment with the economic and social needs, and aspirations of the people who live in it. It notes that the historic environment is constantly changing and sets out six Conservation Principles against which proposals will be considered. The six Conservation Principles are:
- Principle 1 Historic assets will be managed to sustain their values;
 - Principle 2 Understanding the significance of historic assets is vital;
 - Principle 3 The historic environment is a shared resource;
 - Principle 4 Everyone will be able to participate in sustaining the historic environment;
 - Principle 5 Decisions about change must be reasonable, transparent and consistent; and
 - Principle 6 Documenting and learning from decisions is essential.
- 4.33 The Conservation Principles state that,

*"The definition of conservation...is that it is '**the careful management of change**'. In managing historic assets, 'to preserve' — even accepting its established legal definition of '**to do no harm**' — is only one part of what is needed to sustain heritage values. For example, local authorities are required 'to preserve or enhance' conservation areas. This helps emphasize the potential for **beneficial change** to historic assets by revealing and reinforcing their heritage values. 'To sustain' embraces both preservation and enhancement to the extent that the values of a place allow. '**Considered change**' offers the potential to enhance historic*

*assets, as well as generating the need to protect their established heritage values. **It is the means by which each generation aspires to enrich the historic environment.**" (emphasis added).*

- 4.34 Paragraph 1.8 notes that new work must respect the setting and significance of the historic assets affected. The quality of design and execution must add value to that site and its setting, both now and in the future.
- 4.35 In terms of the application of the Conservation Principles, the document states that,
- "Every reasonable effort should be made to eliminate or minimize adverse impacts on historic assets. Ultimately, however, it may be necessary to balance the benefit of the proposed change against the harm to the asset. If so, the weight given to heritage values should be proportionate to the importance of the assets and the impact of the change upon them." (sic)*
- 4.36 The section on the conservation principles in action provides guidance on change to historic assets. The preamble to this section notes that,
- "Tension between conservation and other public policies or legitimate private interests usually arises from a perceived need to harm the heritage values of the historic assets to be affected. In complex cases, it is important to keep a sense of proportion and not automatically to assume that cultural or natural heritage values must prevail. A key objective of Conservation Principles is to provide the framework for a dialogue, based on mutual understanding and respect, from which sustainable solutions will emerge."*
- 4.37 In addition, Paragraph 29 states that,
- "The public interest in conserving and sustaining heritage values **is not in conflict with the building of new work. Innovative design and construction is important to sustaining cultural values**, but should not be achieved at the expense of assets of established value..."*
- 4.38 This advice confirms that new development is compatible in sustaining heritage values. In the case of the proposed development, great care has been taken to ensure that the proposed development would enhance the setting of the nearby listed building.
- 4.39 Paragraph 49 of the Conservation Principles refers to enabling development. It states that enabling development that would secure the future of an important historic asset, but contravene other planning policy objectives, will be unacceptable unless:
- it will not materially harm the heritage values of the historic asset or its setting; and
 - it avoids detrimental fragmentation of management of the historic asset; and
 - it will secure the long-term future of the historic asset and, where applicable, its continued use for a sympathetic purpose; and
 - it is necessary to resolve problems arising from the inherent needs of the historic asset, rather than the circumstances of the present owner, or the purchase price paid; and
 - sufficient subsidy is not available from any other source; and
 - it is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the historic asset, and that its form minimizes harm to other public interests; and
 - the public benefit of securing the future of the historic asset through such enabling development decisively outweighs the disbenefits of breaching other public policies.

- 4.40 Paragraph 50 states that enabling development is development that would deliver substantial heritage benefits, but which would be contrary to other objectives of national, regional or local planning policy. It is an established planning principle that such development may be appropriate if the public benefit of rescuing, enhancing, or even endowing an important historic asset decisively outweighs the harm to other material interests. Enabling development must always be in proportion to the public benefit it offers.

Summary of National Planning Policy

- 4.41 The proposal meets the requirements of national planning policy in terms of design and sustainable development and the site can be adequately accessed and serviced. In addition, it is considered that the proposed development would enhance the setting of the nearby listed building. As a result, it is considered that the proposal fully complies with the provisions of national planning policy and should be regarded as an acceptable form of development.

Local Policy

Development Plan Context

- 4.42 The development plan for the area comprises the adopted Wrexham Unitary Development Plan (UDP), adopted in 2005. An extract from the Proposals Map is provided below:



Wrexham UDP Proposals Map Extract: Site Shown in Red

	Green Barrier Policy EC1
	Special Landscape Area Policy EC5
	Development and Flood Risk Policy EC12
	Protection of Mineral Resources Policy MW9

- 4.43 The proposals map extract confirms that the site is located within a Green Barrier.

Key Policies

4.44 Other relevant planning policies are summarised below:

Ref.	Title	Summary
	Planning Strategy: Growth Strategy and Housing	Paragraph 3.4 of the UDP states that the growth strategy seeks to safeguard the amenity of settlements and secure economy and efficiency in the use of land resources through the regeneration of built-up areas together with limited outward growth. In terms of housing, Paragraph 3.7 states that the housing element of the strategy seeks to make optimum use of previously developed or vacant land; to make use of spare capacity in infrastructure and services; and to focus on locations with reasonable public transport, walking and cycling links.
Policy EC1	Green Barriers	Within Green Barriers, development will only be granted planning permission if it is for agriculture, forestry, essential facilities for outdoor sport and recreation, cemeteries and other uses of land which maintain the openness of the Green Barrier and do not conflict with the purpose of including land within it. The accompanying text to Policy EC1 Paragraph 5.2 states that the purposes of a Green Barrier include: i) to prevent the coalescence of urban areas and villages with other settlements; ii) to assist in safeguarding the countryside from encroachment; iii) to protect the setting of urban areas and villages; iv) to assist in urban regeneration by encouraging the recycling of derelict and other urban land.
Policy PS1	Strategic Policy The Broad Location of Development	New development for housing, employment, and community services will be directed to within defined settlement limits/employment areas.
Policy PS2	Strategic Policy 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	Strategic Policy 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, wherever possible, particularly so where greenfield land is of ecological, landscape or amenity value, or comprises agricultural land of grades 1, 2 or 3a quality.
Policy PS4	Strategic Policy The Broad Location of Development	Development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car.
Policy GDP1		All new development should: a) Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality. b) Take account of personal and community safety and security in the design and layout of development and public / private spaces. c) Make the best use of design techniques, siting and orientation in order to conserve energy and water resources. d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality. e) Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible. f) Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development. g) Secure public services (e.g. gas, water, electricity) to development at minimum public cost. h) Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.

Ref.	Title	Summary
		i) Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site. j) Have regard to the need to safeguard those areas that possess a strong Welsh cultural and/or linguistic identity from development that could harm this identity. k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.
Policy EC4	Hedgerows, Trees and Woodland	Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodland, wildlife and other natural landscape and water features, and include new planting in order to enhance the character of the landscape and townscape. Development which results in the loss or significant damage to valuable trees, important hedgerows or ancient woodland sites will not be permitted.
Policy H5	Housing in the Countryside	Outside defined settlement limits new dwellings will only be permitted where: a) proposals accord with Policies H3, H4, and H8; or b) proposals comprise infilling subject to Policy GDP1; or c) an essential need to house a full time agricultural or forestry key worker can be established and i) the long term financial viability and functional management of the enterprise is proven; and ii) the person, due to the nature of the work, has to live on the site rather than in a nearby settlement; and iii) there are no suitable buildings nearby which could be converted into a dwelling; and iv) the new dwelling is sited adjacent to an existing building, can be landscaped, and is of a form, bulk, design and materials which reflect the locality's rural character. Any permission will be conditioned to limit residential occupancy to essential workers. The accompanying text to Policy H5 in Paragraph 6.12 states that, <i>"This policy is designed to prevent new housing in the form of isolated dwellings, the consolidation of sporadic groups, or the extension of ribbon development in the countryside as it would result in a loss of visual quality and landscape character and adversely affect agriculture."</i> (Policy H3 refers to the conversion of dwellings, Policy H4 refers to the sub-division of existing dwellings and Policy H8 refers to affordable housing exceptions and are not relevant in this case).
Policy EC9	Listed Buildings of Special Architectural or Historic Interest	Alterations or additions to, and development or redevelopment within the curtilage of, buildings or structures listed as of special architectural or historic interest must respect the setting and character of the listed buildings or structures. The accompanying text to Policy EC9, in Paragraph 5.11, states that new development affecting a listed building must be sympathetically designed so as not to harm the listed building's historic integrity and identity.
Policy T8	Parking	Development granted planning permission will be required to provide vehicle parking spaces either on site or nearby, in accordance with the Council's current parking standards

- 4.45 There is no requirement for the provision of affordable housing as part of the proposed development. Policy H7 of the adopted UDP states that provision of affordable housing would be required on housing proposals comprising 25 dwellings or more.

Supplementary Planning Guidance

- 4.46 The Council has prepared two draft Supplementary Planning Guidance documents for consultation. However, these are not relevant to the proposed development.

- 4.47 The Council has also prepared a number of Local Planning Guidance Notes. Relevant Guidance Notes include:
- Local Planning Guidance Note 13: Housing in the Countryside (2011);
 - Local Planning Guidance Note 30: Design (2009);
- 4.48 Local Planning Guidance Note 13 refers to Housing in the Countryside (2011). The Guidance Note states that it amplifies the policies of the adopted UDP and will be a material consideration in the determination of planning applications. The Guidance Note states that housing in the countryside relates to the following proposals:
- Rural enterprise dwellings;
 - Conversion of rural buildings;
 - Affordable housing rural exceptions;
 - Infill development of one or two residential units in a gap along a continuously developed highway frontage;
 - House extensions;
 - Permitted development; and
 - Garden extensions in the countryside.
- 4.49 The proposed development does not fall neatly into any of the above categories. Nevertheless, it is considered that the proposed development should be considered to be acceptable in terms of the overall aims of national planning policy that is referred to in the Guidance Note. This states that the aim is to protect open countryside for its importance as a part of landscape heritage, a natural habitat and to ensure the best agricultural land is retained as a resource for the future. In this respect, the site comprises previously developed land, the former redundant industrial buildings have been demolished and the site is unkempt in appearance. In its current form, the site detracts from the area and the setting of the nearby listed building. Similarly, no habitats of ecological importance, with the exception of trees and hedgerows which would be retained as part of the proposed development, have been identified and the site does not comprise agricultural land.

Housing Land Monitoring Statement 2017

- 4.50 The Council's Housing Land Monitoring Statement, April 2017 states in Paragraph 1.1 that,
- "In the absence of an up-to-date Unitary Development Plan (UDP) and adopted Local Development Plan (LDP), in accordance with latest Welsh Government Guidance on Joint Housing Land Availability Studies (JHLAS), TAN1, January 2015, there is no requirement for a Local Authority to produce a JHLAS and the authority is considered to have **a zero land supply...**"*
- 4.51 Paragraph 3.2 of the Monitoring Statement states that in acknowledgement of a lack of a 5 year housing land supply, the Council has been discussing potential developments with landowners and developers. It will continue to do so in order to assist the successful delivery of further housing sites within the County Borough and to ensure there is a 5 year land supply when the LDP is adopted. Paragraph 3.3 further states that the Council will continue to:
- *"Take a pro-active stance in supporting appropriate growth in the County Borough where it meets policy objectives and identified local needs. This is not just about increasing housing numbers, but to promote sustainable growth in the right locations which meets the needs of local communities"; and*
 - *Liaise with developers to understand the problems they face in the current market conditions."*

- 4.52 The proposed development would contribute 5 dwellings to the Council's small housing sites (less than 10 dwellings) supply. In addition, the extensive repairs and refurbishment of Lower Honkley Farm has brought the previously derelict and vacant dwelling back into beneficial use at a substantial cost to the Applicant. The approval of planning permission for the proposed 5 dwellings at the site would assist in redressing the viability of the refurbishment of the Grade II listed building in light of current market conditions and the proposal would also represent the sustainable re-use of this previously developed site. As such, it is considered that the proposed development is in accordance with the overall principles set out in the Monitoring Strategy for the successful delivery of further housing sites within the County Borough and to ensure there is a 5 year land supply when the LDP is adopted.

Emerging Planning Policy

- 4.53 The Council is currently preparing the Wrexham Local Development Plan (LDP) and has advised that the deposit version of the LDP will be published for public consultation in April 2018. The Preferred Strategy for the LDP was published in February 2016. The principle aim of the strategy is to contribute to sustainable development. In terms of the settlement strategy, the Preferred Strategy states that development located outside of any defined settlement limit is classed as development in the open countryside. This will be strictly controlled and limited to essential development required for farm or forestry workers, small scale infill, rural conversions and affordable housing rural exception sites. In this case, it is considered that the proposal would be compatible with the principles of sustainable development, set out in the Preferred Strategy, in terms of the redevelopment of this previously developed site.

Summary

- 4.54 The comprehensive review of the planning policy context for the site can be summarised as follows:
- The proposed development represents a sustainable form of development comprising the re-use of this previously developed site. It can be adequately accessed and serviced and complies with the provisions of national planning policy on sustainable development;
 - The Council has a zero housing land supply in the absence of an up to date development plan. The proposed development would contribute to the Council's small housing sites supply;
 - The proposal would enhance the setting of the listed farmhouse and complies with the UDP's strategic policies on the use of previously developed sites;
 - The proposed development is compatible with the Preferred Strategy of the emerging LDP.
- 4.55 It is accordingly considered that the assessment of this application should be undertaken in this context.

5.0 MATERIAL CONSIDERATIONS

5.1 The key material planning considerations arising from the proposed development (in light of the planning policy context outlined within the preceding section of the Statement, and having regard to the proposed development) are considered to be as follows:

- Principle of the Development;
- Sustainability;
- Visual and Landscape Impact (Green Barrier); and
- Impact on the Setting of the Listed Building.

5.2 These issues principally relate to the reasons for refusal for the previously submitted scheme for the development of five dwellings at the site. Each of these issues will be considered and addressed in turn in order to demonstrate that the proposal is an acceptable and sustainable form of development at this site.

Principle of Development

5.3 The first reason for refusal for the previously submitted scheme states,

"The site is located outside any settlement limit as defined in the Wrexham Unitary Development Plan and despite an extant planning permission P/2002/1333 covering part of the site, the proposal would inappropriately extend new built development at this location. The scheme submitted provides no justification as to why an exception to the adopted settlement/housing policies of the Wrexham Unitary Development Plan should be made and to allow the proposal would be contrary to policies PS1, PS2, GDP1 (e and k) and H5 of the Wrexham Unitary Development Plan."

5.4 The reason for refusal refers to the following issues, each of which will be considered in the context of relevant material considerations:

- Extension of built development;
- Justification for the proposed development; and
- Planning policy.

Extension of Built Development

5.5 It is acknowledged that the site does not lie within a defined settlement limit. However, the site comprises previously developed land, the development of which would sustainably re-use the site, improve the neglected appearance of the site and thereby considerably enhance the setting of the adjacent listed building. In addition, the Council has confirmed, in its reason for refusal that the site benefits from extant planning permission ref. P/2002/1333 and as such, the principle of development at the site is already well established.

5.6 The previous use of the site for an engineering business was confirmed in the Report of the Chief Planning Officer for planning permission P/2002/1333 for the erection of 3 residential units at the site. The report described the site as follows:

"The site is occupied by a Listed Farmhouse, which fronts the road, behind which is a large shed used, by Honkley Engineering. The shed is highly visible from the surrounding area..."

The site is presently within industrial use and the existing buildings constitute a significant eyesore"

- 5.7 The proposed development of five dwellings at the site would be solely within the boundary of the former industrial works at the site. As such, the proposed development would not extend built development beyond the area within which the previous industrial use operated.
- 5.8 In addition, it should also be noted that the previous proposed development would not exceed the footprint area of the previous industrial buildings at the site. This is summarised in the table below:

Building Footprint	Area (sqm)
Original industrial buildings	1112
Approved 3 dwellings (P/2002/1333)	350
Proposed 5 dwellings (current application)	742

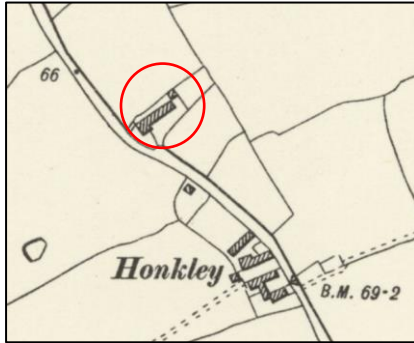
- 5.9 This is represented graphically on the site plan extract below, with the blue dotted lines annotating the extent of the original industrial buildings at the site and the purple dotted lines indicating the layout approved under application reference: P/2002/1333.



Proposed Site Layout

- 5.10 This clearly demonstrates that the proposed development would be well within the scale of the previous footprint of the former industrial buildings at the site and represents only a small proportion (43%) of the previously developed area. As such, the proposed development should be regarded as being acceptable within the context of the footprint of previously built development at the site.
- 5.11 This is further evidenced by historic Ordnance Survey (OS) maps of the area, copies of which are provided below, plus Google Earth historic aerial photographs of the site (provided in Chapter 2 Site and Surroundings). The OS map extracts clearly show built development extended along a large part of the northern boundary in the 1888-1913 extract and that built

development extended along the full length of the northern boundary and occupies the majority of the north-western portion of the site in the 1937-61 map extract. The maps below and images provided in Chapter 2 clearly demonstrate that the majority of the site has been previously developed, either with former farm buildings or with the subsequent industrial use of the site by Honkley Engineering.



OS Extract Six Inch 1888-1913



OS Extract 1:25000 1937-61

- 5.12 With regard to the Council's reference, in its reason for refusal for the previous scheme, that the extant planning permission (ref. P/2002/1333) covered part of the site, it transpires that the previously submitted plan for application ref. P/2017/0072 inadvertently included an area of land to the south, which lay outside the boundary of the former industrial works. This was a drafting error on the plan and this has now been rectified in the current application submission. As such, the current application area relates solely to the area of previously developed land and approximately the same boundary as extant permission ref. P/2002/1333. The Applicant therefore considers that the principle of built development on the application area is established and acceptable.

Justification for the Proposed Development

- 5.13 With regard to the Council's statement that no justification was provided as to why an exception to the adopted settlement or housing policies of the adopted UDP had been provided, the applicant has commissioned a Confidential Valuation and Appraisal Report on the financial viability of the site. This accompanies the planning application as a separate document.
- 5.14 The Appraisal Report includes a detailed review of the viability of the site, with particular reference to the cost of the repair and refurbishment of the adjacent listed building, and considers all aspects of the development and the local property market. The Appraisal Report considers the financial viability of both the development of 3no. and 5 no. dwellings at the site. The findings of the report are summarised as follows:

Scheme 1: Restoration of 1 no. Listed Building and Development of 3 no. New Build Houses

- 5.15 For the existing approved planning permission of 1 no. listed building and 3 no. new build houses, the Appraisal Report demonstrates that the scheme is not financially viable resulting in a Loss of (£168,827) and producing a Negative Profit on Gross Development Value of (10.17%).
- 5.16 Costs involved on the listed building and the remaining development far outweigh the Gross Development Value of the site and are significantly in excess of the minimum necessary to secure the future, in the case of the listed building.
- 5.17 A developer would not raise or self-fund the development due to the high cost of restoration for the listed building and due to a negative return on their investment.

Scheme 2: Restoration of 1 no. Listed Building and Development of 5 No. New Build Houses

- 5.18 For 1 no. listed building and 5 no. new build houses at the site, the Appraisal Report demonstrates a financially viable development with a Profit of £252,634 and a Profit on Gross Development Value of 9.59%.
- 5.19 The Profit margin even for this larger scheme is below the market norm of the usual 20% which would be expected from the majority of developers taking into account the high restoration costs of the Grade II listed building.
- 5.20 On a financial basis this scheme would protect the long term future of the grade II listed building. However, the market norm for this scheme is still below the minimum necessary that would be expected from the majority of developer to secure the future of the listed building.
- 5.21 In terms of the Conservation Principles criteria for enabling development, it has been demonstrated that the proposal:
- Will not materially harm the heritage values of the listed building or its setting. This is explored in more detail in the following sections of the Planning Statement;
 - Will avoid fragmentation of management of the historic asset and will secure the long-term future of the listed building and its continued use as a dwelling;
 - Reflects the extensive restoration costs of the listed building and sufficient subsidy is not available from any other source;
 - Comprises the minimum enabling development necessary to secure the future of the building and would yield a development value well below the market norm, which reflects the high cost of the restoration scheme. The proposal would also minimise harm to other public and land use planning interests as confirmed in this Planning Statement; and
 - Provides a public benefit in securing the long term future of the listed building, plus significantly improving its setting with a sensitive, in-keeping design. As such the proposed development should be considered as an exception to existing land use planning policies that would normally seek to restrict development in this location.

Planning Policy

- 5.22 With regard to planning policy, the Council's decision in respect of extant permission ref. P/2002/1333 was justified in the Planning Officer's Report that there was sufficient justification for the proposal to be considered as an exception to the usual presumption against new housing in the countryside in the interests of enhancing the setting of the listed farmhouse, removing an unsightly building (now demolished) and the undesirability of the use of Stringers Lane for commercial traffic. The site comprises previously developed land and its redevelopment would improve its current unkempt appearance, thereby enhancing the setting of the listed farmhouse and the surrounding landscape.
- 5.23 As such, it is considered that there should continue to be an exception to the location of the site within a Green Barrier (Policy EC1), the requirement for new development to be directed within settlement limits as defined in Policy PS1 and the restrictions on housing in the countryside under Policy H5. With regard to Policy PS2, the proposed development would significantly enhance the listed farmhouse and surrounding countryside in compliance with Policy PS2. Similarly, the proposed development fully complies with Policy PS3 and the overall growth strategy of the UDP as it comprises the re-use of previously developed land.
- 5.24 With regard to Policy GDP1, it is considered that the proposed development complies with the overall context of the policy as follows:

- **Criteria a), k) and j):** The design of the proposed development is compatible with the character of existing built development along Stringer's Lane and the proposal would considerably enhance the setting of the adjacent listed farmhouse. The redevelopment of the site would also result in the clearance of this unkempt site, which would provide a benefit to the visual amenity along Stringers Lane and nearby residential properties. It is considered that the improvement to the setting of the listed building and visual amenity would contribute to the economic, social and environmental well-being of the area. Similarly, the enhancement and improvement of the site would contribute to retaining the Welsh cultural identity of the area in the context of the adjacent farmhouse. The redevelopment of the site would also contribute to its long term future and maintenance;
- **Criteria b), c) and f):** The proposed development has been appropriately designed to meet required design and environmental standards. Additional amenity and environmental requirements could be adequately addressed via appropriate conditions;
- **Criteria d and e):** The site can be satisfactorily accessed and the required visibility splays can be accommodated within land under the control of the Applicant. The site is also well located in terms of a network of public rights of way and the generally flat terrain of the area is beneficial in terms of cycling;
- **Criterion g):** The site can be adequately serviced;
- **Criterion h):** An ecological assessment of the site has been undertaken. Identified trees and hedgerows at the site would be retained and enhanced as part of the proposed development;
- **Criterion i):** The site is not at risk of flooding and the site has no known contamination issues.

- 5.25 In terms of the availability of housing land in the area, Paragraph 6.2 of Technical Advice Note 1 states that:

"The housing land supply figure should also be treated as a material consideration in determining planning applications for housing. Where the current study shows a land supply below the 5-year requirement ... the need to increase supply should be given considerable weight when dealing with planning applications provided that the development would otherwise comply with development plan and national planning policies"

- 5.26 In this case, the Council does not have an up to date development plan and cannot demonstrate a five year land supply. In fact, the Council's Housing Land Monitoring Statement, April 2017 confirms that the Council is regarded to have a zero land supply. Given this, the need and opportunity to increase supply should be given considerable weight in the determination of planning applications. This factor represents a very significant material consideration in favour of the proposed development.

Sustainability

- 5.27 The second reason for refusal of the previously submitted scheme states that,

"By virtue of its unsustainable location outside and divorced from any settlement and local facilities the development would be isolated in the rural landscape. The site approached by means of narrow lanes which are substandard in width and devoid of footways or lighting to the detriment of the safety of pedestrians/cyclists and would be unlikely to be a site which encourage alternative means of travel to the car. To allow the proposal would be contrary to policies PS1 and PS4 of the Wrexham Unitary Development Plan." (sic)

Site Location

- 5.28 With regard to the Council's statement that the site is an unsustainable location, divorced from any settlement and isolated in the rural landscape, the Council failed to acknowledge or recognise that the site comprises previously developed land and is therefore an inherently sustainable site in terms of the advice set out in PPW as detailed in the previous section of this Chapter. It also fails to acknowledge that an extant planning permission for three dwellings remains at the site and can be provided without the need for further planning permission. This application seeks to increase the quantum of house by two additional units and this increase is considered to not be materially less sustainable than the extant three unit scheme.
- 5.29 Furthermore, the site is not isolated in the rural landscape. A large cluster of dwellings is situated just to the south of the site at Cherry Tree Cottage and Honkley Hall Cottages. A further pair of dwellings are situated a short distance along Stringers Lane to the north. The proposed development of the site for five dwellings would be compatible with the courtyard style development at the nearby Honkley Hall Cottages and reflects the established pattern of clusters of dwellings within the rural landscape along Stringers Lane.

Access

- 5.30 The comments from the Highway Authority in the Committee Report for application ref. P/2017/0072 did not refer to the highway standard of the lanes around the site. In fact, the Highway Authority consultation response states that:

"...visibility splays of 2.4m x 43m are required in both directions. Visibility is achievable to the south east, but to the north is only achievable over land outside the boundary of the site. A boundary hedge would need to be lowered to below 1m in perpetuity."

- 5.31 As confirmed by the Highway Authority, the required visibility is achievable to the south-east. With regard to the visibility to the north-west, this land is within the control of the applicant and the boundary hedge has already been lowered to be below 1m. The proposed visibility splays are shown on drawing ref. 5371-104 Rev X and confirms that a suitable access to the site can be achieved.

- 5.32 The previous permission for the development of three dwellings at the site was accompanied by the following condition (Condition 3):

"Before development commences, the height of the highway boundary means of enclosure along the full frontage of the site shall be lowered to and thereafter retained at a height of 1 metre above the level of the nearside edge of the adjoining carriageway."

- 5.33 The extant permission for three dwellings at the site was approved without any requirement for sustainable transport and it is considered that the development of five dwellings is not materially different in highway and access terms. Any residential use at the site would result in significantly lower traffic generation than the previous industrial use and would not involve the frequent commercial traffic that would have been associated with the former use of the site as an engineering works. This was recognised in the Council's comments in respect of the previously approved scheme (P/2002/1333) support the scheme in highway terms. The report of the Chief Planning Officer stated that,

"The proposed change from industrial to residential use will reduce the traffic volumes generated from the site."

Planning Policy

- 5.34 Paragraph 9.1.2 of PPW notes that required development in rural areas may not be able to achieve all accessibility criteria in all circumstances, as is the case with the proposed development. However, the redevelopment of this previously developed site would be sustainable in all other respects as advocated by PPW. In this regard, it is considered that the proposed development would reflect the current pattern of development of clusters of development within the rural landscape along Stringers Lane, thereby complying with Policy PS4 of the UDP. Adequate car parking can also be provided within the site in line with Policy T8.

Visual and Landscape Impact (Green Barrier)

- 5.35 The third reason for refusal of the previously submitted scheme stated that,

"The proposed development extends beyond the previously approved residential area Ref P/2002/1333 and would further encroach into adjoining open countryside, a designated Green Barrier, detrimentally affecting the open character of the area. To allow the development would be contrary to policies PS2, EC1 and GDP1(a) of the Wrexham Unitary Development Plan."

Extension of Built Development

- 5.36 The Council's previous consideration that development of the site would extend development beyond the previously approved scheme (P/2002/1333) is comprehensively addressed earlier in this Chapter of the Planning Statement and is not reproduced in this section.

Impact on the Open Character of the Area

- 5.37 The application site is the same site area as the previously approved scheme and follows its boundaries. The boundaries to the north east and north west are already established with hedging punctuated with trees, and these will be further reinforced with compatible hedging and trees. The Design Statement clarifies that post and rail treatment will also be used to reinforce these boundaries. This is particularly relevant on the south east boundary which is currently open. The application site is therefore contained within the long established site of the previous agricultural and industrial uses.
- 5.38 It should also be noted that the application site is located at the very edge of the designated Green Barrier which follows the northern side of Stringers Lane. The proposed development and the listed farmhouse will be viewed more in the context of the clusters of residential developments on the south side of Stringers Lane rather than in the isolation of open countryside. This proposal is part of an overall scheme to rectify the damage done to the environment and countryside by past industrial uses. The proposed dwellings have been carefully designed to respect the setting of the listed farmhouse as well as minimising the impact on open countryside by enhancing the elements of the previously approved scheme.
- 5.39 An ecological appraisal of the site has been undertaken and its recommendations to retain and supplement trees and hedgerows around the perimeter of the site have been included in the proposed development. This will ensure that local features of ecological and landscape value will be retained and enhanced as part of the proposal, which will in turn contribute to improving overall character of the landscape in the area.

Planning Policy

- 5.40 As previously stated, the Applicant considers that there should continue to be an exception to the location of the site within a Green Barrier (Policy EC1). With regard to Policy PS2, the proposed development would significantly enhance the listed farmhouse and surrounding countryside in compliance with Policy PS2. Similarly, the proposed development complies sufficiently with Policy GDP1 of the adopted UDP.
- 5.41 Clarification on the site area and boundaries of the application together with clarification on the overall objectives and design of the proposed scheme confirm that it is not in conflict with Policy EC1 and helps maintain the openness of the Green Barrier.

Impact on the Setting of the Listed Building

- 5.42 The fourth reason for refusal of the previously submitted scheme states that,

"The proposed development lies adjacent to a Listed Building and the layout, form and scale of the development will harm its setting. To allow the development would be contrary to policy EC9 of the Wrexham Unitary Development Plan."

Impact on the Listed Building

- 5.43 With regard to the previously approved scheme (ref. P/2002/1333), the report of the Chief Planning Officer stated that,

"The removal of the engineering shed and its replacement with a limited number of sympathetically designed dwellings will significantly enhance the setting of the farmhouse. The proposed dwellings have been sited and designed not so as to harm the identify and importance of the Listed Building." (sic)

"The siting is reflective of the previous range of farm buildings, which were tied to and extended to the back of the farmhouse."

- 5.44 Policy EC9 of the adopted Wrexham UDP is quoted in the fourth reason for refusal of the previously submitted scheme. It refers to development or redevelopment within the curtilage of a listed building respecting the setting and character of that structure. Prior to this reference to the term 'curtilage' there has been no evidence of discussion of what constitutes the curtilage of Lower Honkley Farm, either through the determination process or in the planning officer's report to the April 2017 Council Planning Committee. Neither was there any reference to or assessment of curtilage in the determination of planning application P/2002/1333, approved in 2005, which dealt with the demolition of the redundant industrial buildings and the erection of 3 residential units.
- 5.45 Cadw's listed building site plan does not purport to indicate the curtilage of the listed structure, it is essentially an aid to identification and location of the building. Any assessment of curtilage would need to relate to the situation that existed at the time of statutory listing. The most recent best-practice guidance on this issue which follows current legislative provision and case-law is contained in Historic England Advice Note 10, Listed Buildings and Curtilage, February 2018. The courts have said that there are three key factors to be taken into account when assessing curtilage:
- The physical layout of the listed building,
 - Ownership, both historically and at the date of listing,
 - The use or function of the relevant building(s), both historically and at the date of listing.
-

- 5.46 However, it is acknowledged that the setting of the listed farmhouse will be affected by the proposed development.
- 5.47 To assist with an assessment of development proposals that could have an impact on the setting of an historic asset, guidance is given by the Welsh Government, Cadw, in its publication 'Setting of Historic Assets in Wales', May 2017.
- 5.48 One key stated objective of this guidance is that 'development proposals should aim to avoid any harmful impact on a historic asset and its setting'. This assessment sets out to show that not only has harm been avoided but that the setting of a historic asset has been enhanced.

Historic Asset

- 5.49 The historic asset adjacent to the proposed development site is identified by Cadw as Lower Honkley Farmhouse, reference number 17462, and was designated as a listed building of special architectural or historic interest in 1996 at grade II, which is the lowest of three possible gradings. The reason for designation was given as 'listed notwithstanding alterations as a surviving example of a sub-medieval cruck-framed dwelling'.
- 5.50 Records show that over past centuries the house has undergone many alterations and changes. It was refurbished and generally modernised in 2009 following a period of neglect and dilapidation, and is all that survives of what was once a small farmstead with associated farm buildings
- 5.51 Briefly, the changes and evolution of the building can be characterised as follows:
1. An early-16th century hall-house probably of 4-5 bays on the site of the present house
 2. Conversion to a c1600 house of 2 units with open hall and storied parlour end
 3. Stone kitchen wing added in the early-18th century with gable end alterations in brick in late-18th century
 4. In the late-18th century the timber framed part was replaced in brick and the porch and pantry added. At this time a first floor was added in the open hall
 5. 19th century alterations included blocking of doorways and a window, adding of the low porch, and part demolition of in-line buildings
 6. Post 1950 the farmstead buildings had been progressively altered to accommodate industrial uses, with piecemeal replacement with steel and aluminium clad buildings taking place.
 7. At the time of listing, the industrial buildings to the rear of the farmhouse covered a large proportion of the application site, and extended from the immediate rear of the farmhouse, dominating the farmhouse and whole site.
- 5.52 Currently, the repaired and refurbished farmhouse sits at the front of the whole site with a recently constructed oak framed garage block to the rear. The industrial buildings have been largely cleared, and the farmhouse does not now have any positive relationship to the remainder of the site. The changes and evolution of the farmhouse have been brought about more by an operational relationship with the rear of the site than the surrounding countryside. This is why it is so important to reinstate that context.
- 5.53 The approved development of three dwellings sought to reinstate this context of buildings, and the proposed development of five dwellings seeks to further enhance this relationship. The footprint of the main proposed block follows the in-line arrangement of the former agricultural buildings from the rear of the farmhouse that was apparent on old maps and aerial photographs.

- 5.54 The separation distance from the rear of the farmhouse has been maintained to the line of the approved dwellings, although the recently built garage block places increased emphasis on this separation. To further avoid any sense of dominance of the proposal the Design Statement makes it clear that the ridge height of the dwellings is set lower than that of the farmhouse and the oak framed garage block.
- 5.55 The full arrangement of the proposal follows the theme of the approved plan but by enhancing the sense of courtyard enclosure it is in a less urban form. The sense of enclosure is completed by a detached oak framed garage block on the south east boundary, in a similar position to the approved layout.
- 5.56 The Design Statement demonstrates how the elevational treatments and materials, and scale of the proposals all seek to enhance the setting of the listed farmhouse through a reinstated relationship with the rear of the site through a scheme of more agricultural form.
- 5.57 Local references have been used, particularly the barn conversions nearby on Stringers Lane, to ensure that not only is the proposal compatible with the adjacent farmhouse but also complements characteristics in a wider context.
- 5.58 This proposal has been fully researched and designed to respect the setting of the listed asset and ensure that any harm is avoided, but also to enhance that setting, which the recently repaired and refurbished farmhouse fully requires. The proposal takes the positive aspects of the approved scheme and further improves the relationship with the farmhouse.
- 5.59 *Planning Policy*
- 5.60 The objective of Policy EC9 is to protect the character of listed buildings where development is proposed within the setting. This reflects national policy to safeguard heritage assets. The previously approved scheme was recognised as being sympathetically designed to significantly enhance the setting of the farmhouse. The current proposal has further enhanced aspects of the approved scheme to ensure that the listed building's historic integrity and identity is fully respected.

Summary

- 5.61 In summary, it has been demonstrated that,
- The proposed development would be well within the scale of the previous footprint of the former industrial buildings at the site and represents only a small proportion of the previously developed area. As such, the proposed development should be regarded as being acceptable within the context of the footprint of previously built development at the site;
 - A Valuation and Appraisal Report of the proposed development has confirmed that the scheme would protect the long term future of the Grade II listed building;
 - The proposed development would achieve the objectives of enabling development as set out by the Conservation Principles;
 - The proposed development would significantly enhance the setting of the listed Lower Honkley Farmhouse and general views of the countryside in and around the site;
 - The site can be appropriately accessed and the required visibility splays can be achieved at the site. Adequate car parking can also be accommodated on site;
 - The proposed development complies with all relevant aspects of national and local planning policy;

- Suitable mitigation measures are proposed to ensure that the proposed development is acceptable from a biodiversity impact perspective;
- The previously approved scheme was recognised as being sympathetically designed to significantly enhance the setting of the farmhouse. The current proposal has further enhanced aspects of the approved scheme to ensure that the listed building's historic integrity and identity is fully respected.

6.0 SUMMARY AND CONCLUSIONS

Purpose of this Statement

- 6.1 This Planning Statement outlines the context within which the application is made, and provides a detailed examination of the main planning considerations raised by the proposals, together with a reasoned justification in support of the proposed development. The detailed assessments undertaken and provided to inform this planning application are considered to add considerable weight to the merit of this proposal and enable the scheme to be viewed favourably.

Summary of the Key Considerations

- 6.2 In summary, on the basis of a comprehensive review of both the policy and physical context of the application site, the site is considered to be suitable for development and the proposals should be viewed favourably for the following reasons:
- The proposed development would be well within the scale of the previous footprint of the former industrial buildings at the site and represents only a small proportion of the previously developed area. As such, the proposed development should be regarded as being acceptable within the context of the footprint of previously built development at the site;
 - A Valuation and Appraisal Report of the proposed development has confirmed that the scheme would protect the long term future of the Grade II listed building;
 - The proposed development would achieve the objectives of enabling development as set out by the Conservation Principles;
 - The proposed development would significantly enhance the setting of the listed Lower Honkley Farmhouse and general views of the countryside in and around the site;
 - The site can be appropriately accessed and the required visibility splays can be achieved at the site. Adequate car parking can also be accommodated on site;
 - The proposed development complies with all relevant aspects of national and local planning policy;
 - Suitable mitigation measures are proposed to ensure that the proposed development is acceptable from a biodiversity impact perspective;
 - The previously approved scheme was recognised as being sympathetically designed to significantly enhance the setting of the farmhouse. The current proposal has further enhanced aspects of the approved scheme to ensure that the listed building's historic integrity and identity is fully respected.

Conclusion

- 6.3 In conclusion, there are no technical constraints to the redevelopment of this site. The local planning authority has confirmed that permission P/2002/1333 remains extant and therefore the principle of residential development at the site is considered to be acceptable and established. Accordingly, the planning application should be considered favourably by the local planning authority and planning permission granted for proposed development.