PLANNING, DESIGN AND ACCESS STATEMENT

Application for the change of use of two existing holiday lets to form one residential dwellinghouse and associated works

at

Barn Cottages
Broomers Lane
Iscoyd
Whitchurch
SY13 3AR

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1. Introduction

1.1 This statement has been prepared and submitted by Halls on behalf of The application is for conversion of the existing Barn Cottages (being two attached holiday lets) into a residential dwelling and associated works.

1.2 This statement assists in identifying the context of the proposed application, including an assessment of how the proposed development accords with relevant national and local planning policies. This statement aims to set out other material considerations, to support the Council in their consideration of this application.

1.3 I trust the submitted details are sufficient to enable and support you in your consideration of this application. Should you require any further information please do not hesitate to contact me.

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2. Site Description and Context

2.1 The application site (Barn Cottages) is located to the north of Broomers Lane, Whitchurch. The property gains access via an existing crossing to the lane. Onsite, the property contains a number of self-contained accommodations as well as agricultural land. Built development onsite is clustered towards the street frontage and formed of a series of attached buildings. To western-most structure is a two-storey dwellinghouse (Iscoyd House), connecting to two, single car garages to the east. The garages in turn connect to the Barn Cottages.

2.2 The Barn Cottages were established in 2018 by conversion of a redundant swimming pool building and are utilised as holiday lets in accordance with their approved planning permission (P/2018/0142). The accommodation block is formed of two attached holiday units, being one, one-bedroom and one two-bedroom unit.

2.3 The property is located within the County Borough of Wrexham. The site is approximately 3.6 miles from the Whitchurch town centre to the east and 13.8 miles from Wrexham town centre to the west. Iscoyd House and the Barn Cottages share a vehicle access point from Broomers Lane, with shared vehicle parking within the garages and hardstand/driveway space onsite.

2.4 A public right of way extends parallel to the western site boundary, but is located within adjoining land. Similarly, the wider area contains a number of designated heritage buildings and monuments, but none are located within the boundaries of the application site. There are no Irreplaceable or Protected Habitats and Areas within the application site. The site falls outside of any identified settlement boundary and does not form part of an identified urban or rural village.

2.5 The holiday lets are jointly operated by Since the 2020/2021 financial year the holiday lets have been operating at a financial loss. Combined

with the health issues facing as they age, the upkeep and financial drain presented by the holiday lets is a cause of significant of stress. The holiday lets are not considered to be a viable enterprise.

2.6 To allow to remain within her established community and age in place, it is proposed to convert the two holiday let cottages to a single residential dwelling. This is considered to be a more appropriate and sustainable use of the existing building onsite and will support an increase in housing supply within the area.



Figure 1: Iscoyd House and adjoining garage; viewed from the east looking north-west



Figure 2: Barn Cottages building, viewed from south looking north

2.7 This application is accompanied by medical notes and prior tax returns, providing evidence of the health concerns and financial strain the existing holiday lets present.

2.8 The building containing Barn Cottages was extensively refurbished at the time of the holiday lets were established, and now presents a warm, dry, modern accommodation offering.

3. Proposed Development

3.1 The proposal is for the conversion of two holiday lets to a single dwellinghouse that will allow for an open market dwelling with amenity areas and parking, plus associated works.

3.2 Physical works associated with the proposal are minimal, and largely internal. An existing connection between the garage and hallway will be blocked up and the second kitchen will

be removed to create a single, unified dwelling. The only external change will be the blocking up of a window off the storeroom.

3.3 The garage will be retained for use in conjunction with Iscoyd House, while the new Barn Cottage will continue to utilise the shared access and parking within the open hardstand.

3.4 The limited physical works ensure that the proposal will have negligible impact upon the surrounding natural and built environment to ensure visual amenity maintained, in recognition of the site's rural character.

3.5 Please see accompanying plans and sections below to support.

4 Planning Policy and Principle of Development

4.1 Under section 38(6) of the Planning and Compulsory Purchase Act 2004, all planning applications must be determined in accordance with the adopted development plan unless material considerations indicate otherwise. The planning system as a whole shapes development toward the most sustainable locations, with the national planning policy framework forming a material consideration in applications assessed under policies contained within an up-to-date Local Plan.

4.2 **Future Wales - The National Plan 2040**
Future Wales – the National Plan 2040 sets the national development framework for Wales. It is the higher tier of development plan within the Welsh planning framework. As a spatial plan, *Future Wales* sets out a strategy for addressing national priorities through the planning system.

4.3 *Future Wales* Policy 4 states:
The Welsh Government supports sustainable and vibrant rural communities.
Strategic and Local Development Plans must identify their rural communities, assess their needs and set out policies that support them. Policies should consider how age balanced communities can be achieved, where depopulation should be reversed and consider the role of new affordable and market housing, employment opportunities, local services and greater mobility in tackling these challenges.

4.4 **Planning Policy Wales: Edition 12 – February 2024 (PPW)**
The PPW sets out the land use planning policies of the Welsh Government. The primary objective of the PPW is to ensure that the planning system contributes toward the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.

4.5 With regard to development in the countryside, paragraph 3.6 of the PPW notes that such activity should be located within and adjoining settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation, with

infilling or minor extensions acceptable where they meet a local need or will increase economic activity.

4.6 Technical Advice Note 6 (TAN 6) is intended to provide practical guidance on the role of the planning system in supporting the delivery of sustainable rural communities. It seeks to support sustainable and vibrant rural communities, fostering social inclusion and seeks to enable re-use or adaptation of rural building(s). The focus in on allowing re-use that supports both housing and employment opportunities, with an emphasis placed on allowing conversion for holiday lets and supporting fam diversification.

4.7 **Wrexham Unitary Development Plan (1996-2011) - UDP**

Policy H5 of the UDP states that, 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 […].*

Policy H3 supports conversion of buildings to residential use where:

a) in the case of agricultural buildings, there is no longer an agricultural need and alternative non-residential uses have proved inappropriate; and
b) the building is structurally sound and capable of conversion without extensive rebuilding tantamount to the erection of a new dwelling; and
c) any inherent characteristics of merit in the building are retained; and
d) the proposed dwelling and the resulting curtilage does not constitute an undesirable intrusion into the landscape, create access problems, nor require the provision of services at public cost; and
e) the floor plan of the existing building is sufficient to create a habitable dwelling.

Policy GDP1 details the general development principles to be met by new development, and seeks to achieve positive outcomes through consideration of scale, design and layout, materiality, safety and security, access, servicing, ecology and biodiversity, hazard management, cultural identity and support for the economic, social and environmental wellbeing of an area.

Strategic Policy PS2 requires that: *Development must not materially detrimentally affect countryside, landscape / townscape character, open space or the quality of the natural environment.*

4.8 **Local Planning Guidance Notes 3 and 13**

The above Local Planning Guidance details matters of consideration where converting rural buildings and undertaking housing in the countryside respectively. The proposal is considered against the "conversion" provisions. LPG Note 13 states that, where a building is structurally sound and capable of conversion (without extensive rebuilding) conversion to other use(s) – including residential – can safeguard a building's future. LPG Note 3 provides guidance on the structural, amenity, access, and other material considerations that should be considered in support of a proposal to convert.

Policy Analysis

4.9 The proposed conversion from holiday let to open market housing is considered to be consistent with the policy direction outlined above. Notably, the proposal seeks to repurpose an existing building, supported by established infrastructure and access networks, with negligible external impact on habitat or landscape due to the extremely limited scope of physical works proposed.

4.10 While the existing building is not presently utilised for agricultural purposes, it is nevertheless an established rural building and it has been demonstrated (by virtue of the accompanying tax returns) that the holiday lets for which planning permission was previously granted have been operating at a loss since 2021. Clear and continuing effort has been made to use the building for other non-residential purposes, prior to consideration of open market housing

4.11 The proposal is also consistent with the outcomes sought by GDP1; the building is *in situ* and the conversion will not have a detrimental effect in regard to scale, design, layout, safety and security, access or servicing effects, nor will it impact on the biodiversity or landscape values of the wider rural area.

4.12 The proposal also supports aging in place, allowing adaptive development patterns to reflect the changing needs of the current owner and fostering development of sustainable rural communities. Of note, an extensive agricultural field remains to the north of the site, ensuring small scale agricultural activity can be retained elsewhere onsite.

4.13 Taken as a whole, the policy framework supports conversion and re-use of buildings, where suitable and consistent with principles of sustainable development. The above assessment is considered to support and establish the principle of development, by virtue of allowing adaptive reuse of an existing building for which alternative non-residential uses have been proven inappropriate.

5 Design and amenity considerations

5.1 The provisions of Policy PS2 and Policy H3 within the UDP, and the LPG Notes 3 and 13 require that converted buildings are structurally sound, achieve appropriate internal amenity outcomes, and are of design and scale that will not materially detrimentally affect countryside character and quality of the environment.

5.2 The proposed conversion requires minimal physical works to occur onsite. The building is *in situ* and can be readily converted by blocking up one external window, and removal of an internal door and kitchen. The forms and proportions of the building will remain unchanged. The building itself is legally established, with planning permission previously obtained for conversion from an enclosed swimming pool to the holiday lets in 2018; it thus forms part of the established character and built form within the site and wider countryside. The proposed residential unit will not result in materially detrimental effects upon countryside character or quality of the environment.

5.3 The holiday cottages were created in 2018 and the building was extensively refurbished at the time, in accordance with the associated planning permission. The building is thus of a high quality and is structurally sound. Full plans accompany the proposal and demonstrate that ample provision has been made for living space, daylight and sunlight access, ventilation, servicing and private amenity curtilage space for the intended dwellinghouse.

5.4 Outlook, privacy, and natural light are safeguarded for occupiers of the converted Barn Cottages, and neighbouring dwellinghouses. One window from a storeroom will be closed up to ensure suitable privacy between the residential units onsite, achieving amenity levels consistent with housing standards. Both the Barn Cottage and Iscoyd House will continue to benefit from private outdoor living areas.

5.5 Overall, the proposal raises no material issues in relation to design nor amenity, in compliance with Wrexham policy.

6 Highways and Access matters

6.1 The residential dwelling will utilise the existing vehicle access from Broomers Lane. Access arrangements will continue to function as per the existing residential lets; Iscoyd House will utilise the garage onsite with vehicles for the new residence utilising open hardstand parking. These arrangements are existing and safely operate, with appropriate visibility achieved along Broomers Lane.

6.2 The proposals continue to maintain and safeguard safety of the highway network, consistent with Policy T8 of the UDP and the material considerations of LPG Note 3.

7 Waste and Recycling

7.1 Waste collection storage is identified on the plan drawings, and taken to the roadside at the appropriate times to ensure ease of access for Council waste collection staff.

8 Green Infrastructure Statement

8.1 The proposal will not result in loss of any existing green infrastructure assets, and one bird and one bat box will be installed onsite to ensure that green infrastructure enhancements are secured. Further detail is provided in the attached Green Infrastructure Statement.

9 Drainage

9.1 The application site is located with the River Dee and Bala Lake catchment, identified as Phosphorus Sensitive Special Area of Conservation by Natural Resources Wales (NRW). It is proposed to dispose of foulwater via the existing onsite wastewater controls, established at the time the holiday lets were formed

9.2 The Nutrient Budget Calculator[1] is premised on the fact that a proposal will increase the number of dwellings or units that will be occupied at the conclusion of works. The proposed change from two holiday lets to one dwellinghouse is not considered to **increase** the number of potential occupants, particularly when taking into account that the number of available bedrooms will reduce from three within the holiday lets to two within the proposed residential dwelling house.

Number of additional dwellings/units

You will need to enter the number of additional dwellings that will be within the development at the time of completion of the development. This methodology is concerned with any residential, commercial or tourism development that increases the number of overnight stays, or leads to people coming from outside of the hydrological catchments into these SAC catchments with nutrient issues. If a development involves constructing additional dwellings/units in place of those that were pre-existing, only the additional dwellings/units are input to the calculator.

9.3 It is acknowledged that holiday lets may result in less continual occupancy than standard residential use. In lieu of similar guidance on the Wrexham or Welsh Government website, guidance has been taken from the Herefordshire Council document *"Phosphate Credit and Nutrient Neutrality FAQs"*, published April 2025[2], that, unless the accommodation typology is genuinely seasonal, 80% occupancy must be assumed.

13 How is occupancy rate for self-catering holiday let accommodation set in Herefordshire for use in budget calculations?

The council will expect holiday let accommodation to assume 2.3 person occupancy (to match local evidence on dwelling occupancy) and to assume that the let will be occupied 80% of the time in most circumstances. The calculation should use 120l of water use per person per day.

Where a single very large holiday let is proposed (4 plus double bedrooms for large groups) the council will require a bespoke occupancy level to be determined.

For shepherds huts (or similar) it may be appropriate to reduce the occupancy down to 2 people per unit.

Generally 80% occupancy should be assumed. Only where use can genuinely be said to be seasonal, e.g. shepherds huts or glamping which are not suitable for winter use, may a reduced occupancy period be used to reflect the 'closed' season (60% occupancy would then be assumed). This will be secured by planning condition.

9.4 The default occupancy rate within the Nutrient Budget Calculator for residential purposes is 2.33 people. Across the two holiday cottages, and assuming 80% occupancy as per the Herefordshire guidance, this would equate to occupancy of 3.7 people. By comparison, the assumed 2.33 occupancy rate for the one residential home proposed is lower than the cumulative occupancy of the existing holiday lets. By extension it is therefore understood that foulwater and associated phosphorus discharges would be reduced.

9.5 Based on the above, no increase in wastewater discharges is anticipated as a result of the development and the proposal is not considered to contribute to an increase of phosphorus within the River Dee and Bala Lake catchment.

[1] Nutrient budget calculator | GOV.WALES
[2] Phosphate Credit and Nutrient Neutrality FAQs

10 Conclusions

10.1 The proposal is for the conversion of two existing holiday lets to a single open market dwelling. The development is supported in principle by Policy 4 of *Future Wales* and TAN6 by enabling reuse of an existing building and supporting sustainable communities by allowing the client to age in place. The proposal is also consistent with Policies H5 and H3, GDP1 and PS2, and the accompanying Local Planning Guidance Notes 3 and 13 of the Wrexham Borough Council planning framework due to the minimal physical works required, and proven evidence that alternative non-residential use of the building as a holiday let operation is not financial sustainable and is thus not an appropriate use.

10.2 The proposal would bring positive planning benefits such economic and social benefits through the re-use of an existing building and occupiers contributing to the local economy.

10.3 As the proposal is in full compliance with the adopted polices within the Local and National planning polices and given there are no barriers to the proposed development, Wrexham Borough Council are kindly invited to support and approve this application.