

Rural Enterprise Dwelling Appraisal

Land at Springhill Farm
Selattyn
Oswestry
SY10 7NZ

Outline application for the construction of a Rural Enterprise Dwelling, detached garage and all associated works (all matters reserved)

[redacted]

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August 2025

Roger Parry & Partners LLP
www.rogerparry.net
planning@rogerparry.net
Tel: 01691 655334

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Author:	Gwyn Humphreys BSc (Hons) AssocRTPI
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Roger Parry & Partners LLP
Mercian House
9 Darwin Court
Oxon Business Park
Shrewsbury
SY3 5AL

Tel: 01691 655334
01743 791336

gwyn@rogerparry.net

www.rogerparry.net

Ref: 77427

1.0 Introduction

1.1 Roger Parry & Partners LLP has been commissioned by [redacted] ("the Applicant") of Springhill Farm to provide a Rural Enterprise Dwelling Appraisal of the requirement for a new rural enterprise worker's dwelling on the agricultural holding and equine/tourism business at Springhill Farm, Selattyn, Oswestry. This appraisal is submitted in support of an outline planning application for the development, and follows the refusal of planning application ref: P/2023/0372 in November 2024.

1.2 The statement provides an objective evaluation of the agricultural, equine and tourism businesses operated by the Applicants in order to justify the requirement for an additional residential dwelling on the holding, meeting the requirements of Welsh Government national planning policy and the policies of Wrexham County Borough Council concerning residential development in the open countryside with a 'rural enterprise need'.

1.3 This appraisal is based on the information obtained during visits to the site. The Author has had sight of the enterprise's recent business accounts when preparing this appraisal.

2.0 Background & Site Context

2.1 Springhill Farm is a long-established traditional Welsh upland farm, located within a remote and challenging corner of Wrexham County Borough; adjacent to the county boundary with Powys and approximately 2.3km north-west of the boundary with England (Shropshire).

2.2 There are three businesses operated from Springhill Farm, all of which are well-established and profitable. All are under the oversight of the Applicant, [redacted]. The businesses are:

- Springhill Farm (agriculture): The farming business operated from the holding at Springhill Farm, farming a total of 54.25 hectares (134 acres).

- Springhill Farm Equestrian/Stabling business: A long-established stabling, riding and livery business which is operated from the farm.

- Springhill Farm Bunkhouse: A highly successful holiday let business operating from converted former agricultural buildings on the yard at Springhill Farm.

2.3 With regards the farming enterprise operating from the site, as noted, the farm extends to 134 acres of grazing and grassland. The holding is registered with the Welsh Government as an agricultural holding, and claims Single Farm

Payment annually, as well as being registered with the Sustainable Farming Scheme (SFS). Whilst no sheep and cattle are currently farmed, the business does make approximately 500 large bales of silage and hay per year and the land is actively farmed.

2.4 The farm at Springhill also hosts a long-established equine business operated by the Applicant. The equine business comprises a riding stables and livery facility, as well as a horse breeding enterprise. At present Springhill Farm houses 69 horses of various ages, and the facility is licensed to house up to 70 at any one time by Wrexham County Borough Council.

2.5 The facilities at Springhill Farm are registered as a British Horse Society (BHS) riding school which reflects the high quality of the facilities and the schooling on offer, as well as the investments which have been made on-site by the Applicant over the years.

2.6 The Bunkhouse at Springhill Farm is a short-term holiday rental barn conversion located on-site. This enterprise is run as a separate business to that of the farm and the equine business; although many people staying in the Bunkhouse also utilise the riding stables, and as such the two aide each other and provide a valuable form of diversification for the farm.

2.7 The Bunkhouse was converted from an old redundant agricultural building in the early 2000s as a way of farm diversification. This was to provide an additional income for the Applicant, who was recently widowed at the time, to be able to raise a young family and continue building up the equine business.

2.8 Whilst impacted heavily by the Covid pandemic, the occupancy levels of the bunkhouse accommodation have now picked back up and the business is highly successful with good reviews from guests.

2.9 As noted, [redacted] is the Applicant and majority owner of the application site and its various rural businesses. Whilst still effectively working full-time on the enterprises at Springhill Farm, [redacted]

2.10 [redacted]

2.11 The Applicant's daughter, [redacted], currently works on a self-employed basis as a Yard Manager at Springhill Farm; primarily in connection with the equine

business but also to run and manage the bunkhouse accommodation. [redacted] lives off-site elsewhere within the Ceiriog Valley [redacted] and thus travels to and from the farm each day. As a result, she is not on-hand during all times of the day to respond to and deal with any unexpected situations which may arise on-site.

2.12 A number of other part-time/seasonal workers (some of which are freelance/self-employed) work as part of the equine business as instructors and grooms. None of these workers live on-site – instead residing within the wider Ceiriog Valley and Oswestry areas.

2.13 The application site is located within a very rural, upland location approximately 3.3km south-east of Glyn Ceiriog as the crow flies and approximately 9.2km north-west of Oswestry. The site is accessed via a network of single track country lanes which are in a poor state of repair; effectively meaning the farm is completely inaccessible during inclement winter weather.

2.14 The application site itself is located on the south-eastern edge of the existing farm and stables complex at Springhill Farm. As a result, the site is viewed wholly within the context of the existing built development at the farm and is not isolated within the surrounding rural landscape.

2.15 The surrounding area is predominately agricultural in nature, largely comprised of upland grazing (livestock farming). The rural context of the site is shown below in Figure 1, with the application site itself being denoted by the red star:



Figure 1: Application site location and context

3.0 The Proposed Development

3.1 The application seeks outline planning permission (with all matters reserved for future consideration) for the construction of an additional dwelling house on-site at Springhill Farm. The development will comprise the erection of a dwelling house, a detached garage, the creation of a new residential curtilage, the installation of a package treatment plant and all associated works. As noted from the submitted drawings, the proposed dwelling will be sited immediately adjacent to the existing farm and stables complex at Springhill Farm, and also in close proximity to the exiting dwelling house.

3.2 Importantly, the siting of the proposed dwelling will be within sight and sound of the farm and stables complex; allowing the occupier (rural worker) to be readily available on-site to respond to any unexpected and out-of-hours situation on-site.

3.3 As the application is submitted in outline (with all matters reserved), indicative scale parameters for the proposed dwelling and garage are provided below:

Element	Lower Measurement (m)	Upper Measurement (m)
Dwelling Height	6	10.5
Dwelling Width	6	14
Dwelling Length	8	16
Garage Height	4	5
Garage Width	5.4	6.4
Garage Length	5.5	6.5

3.4 The proposed development is shown indicatively on Drawing No: 77427 / RJC / 003 REV C. As shown on the plan, the site can be developed appropriately without causing any adverse visual impacts upon the character of the area.

3.5 A dedicated driveway parking/turning area is proposed on-site to serve cars/vehicles on-site, whilst a new package treatment plant and drainage field is proposed to appropriately deal with the foul water flows from both the proposed dwelling house and the existing farmhouse – with the current dwelling's existing septic tank to be decommissioned.

4.0 Planning Policy Context

4.1 *Future Wales: The National Plan 2024* is the Welsh Government's National Development Plan for Wales, and sets out the Welsh Government's objectives and aspirations for the nation moving towards 2040. At Policy 5 (Supporting the Rural Economy) it confirms its support for strong rural business and rural enterprises, stating:

"It is important that rural communities develop strong economies and support local enterprise. The presence of local rural business and employment opportunities can reduce the need for workers to travel long distances and reduce the reliance on larger economic centres.

Lack of employment opportunity is a key reason behind rural depopulation, particularly in the younger workforce; it can also contribute to deprivation and inequality. Developing local opportunities, particularly in higher paid sectors, is important to retain workers, broaden the skills base and help sustain communities. Rural areas should develop a broad economic base which supports a strong foundational sector, agricultural and forestry industry, innovative and emerging technology based enterprise, start-ups and micro businesses".

4.2 The Welsh Government considers that an efficient and flexible agricultural industry is essential for rural prosperity. To this end, Paragraph 5.6.8 of Planning Policy Wales (Edition 12, 2024) states:

"Planning authorities should adopt a constructive approach towards agricultural development proposals, especially those which are designed to meet the needs of changing farming practices or are necessary to achieve compliance with new environmental, hygiene or welfare legislation".

4.3 The adopted Wrexham Unitary Development Plan (UDP) (1996-2011) is of primary relevance in terms of local planning policy in this instance. Policy H5 relates to Housing in the Countryside and states:

"Outside defined settlement limits new dwellings will only be permitted where:

(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".

4.4 Wrexham Local Planning Guidance Notes 02 (Agricultural Appraisals) and 13 (Housing in the Countryside) are also of some relevance.

4.5 Given the age of the Wrexham UDP, and the fact the evidence base underpinning its policies is now approximately 30 years old, it is noted the weight which can be given to its policies within the overall planning balance is now limited.

4.6 The un-adopted Wrexham Local Development Plan (LDP) is noted to still be a material planning consideration and recent appeal decisions within Wrexham have confirmed this to be the case. Of principal relevance is LDP Policy H7 (Housing in the Countryside). However, the policy in question simply refers to national planning policy on the topic of rural enterprise dwellings contained within Technical Advice Note 6 (TAN 6).

4.7 Section 4.4 of TAN 6 relates to *'new dwellings on established enterprises'* and indicates that permission may be granted for permanent dwellings on well-established rural enterprise units for essential workers who need to live on the unit where it can be demonstrated, in Paragraph 4.4.1, that:

a) "there is a clearly established existing functional need;
b) the need relates to a full-time worker and does not relate to a part-time requirement;
c) the enterprise concerned has been established for at least three years, profitable for at least one of them and both the enterprise and the business need for the job, is currently financially sound, and has a clear prospect of remaining so;
d) (d) the functional need could not be fulfilled by another dwelling or by converting an existing suitable building already on the land holding comprising the enterprise, or any other existing accommodation in the locality which is suitable and available for occupation by the worker concerned; and
e) other normal planning requirements, for example siting and access, are satisfied."

4.8 Given the age of the Wrexham UDP, and the fact the un-adopted Wrexham LDP does not contain a policy position relating specifically to applications for rural workers' housing, it is considered the provisions of TAN 6, and its accompanying Practice Guidance for Rural Enterprise Dwellings, is of principal relevance to this application.

5.0 Appraisal of Need

5.1 As noted above, Part 4.4 of TAN 6 sets-out the Welsh Government's requirements with regards proposals for new dwellings on established rural enterprises such as at Springhill Farm.

5.2 This planning application is a re-submission of application reference P/2023/0372, which was refused by the Local Planning Authority in November 2024.

5.3 Part 2.2 of the TAN 6 Practice Guidance for Rural Enterprise Dwellings confirms the five groups of enterprises which are covered by the provisions of TAN 6, as follows:

- Agriculture and forestry;
- Activities which obtain their primary inputs from the site;
- Land management related activities;
- Land related tourism and leisure; and
- Support services related to rural-based activities

5.4 The Planning Officer dealing with application reference P/2023/0372, within their Delegated Report, confirmed that the scale and nature of the enterprise in question at Springhill Farm does fall within the scope of the rural enterprise dwelling policy area outlined within TAN 6.

5.5 As such, consideration can now be given to the four 'tests' outlined within Part 4.4 of TAN 6: the Functional Test, Time Test, Financial Test and the Other Dwelling Test. These will be addressed in turn below:

Functional Need

5.6 As noted, there are essentially three elements to the overall rural enterprise which is operated from Springhill Farm. These are the:

- Farming Business (agriculture);
- Equine business (stabling, liveries, riding school and horse breeding); and
- Bunkhouse holiday let accommodation.

5.7 Animal welfare legislation requires that all animals are managed in a manner which accords them freedom from thirst, hunger and malnutrition; appropriate comfort and shelter; the prevention, or rapid diagnosis and treatment of injury, disease or infestation; freedom from fear; freedom to display most normal patterns of behaviour, and it is accepted that, without good stockmanship, animal welfare can never be adequately protected.

5.8 On average there are usually approximately 70 horses on-site at Springhill Farm at any one time (in-line with the facility's licence requirements). At the

time of the application's submission, it is confirmed there are currently a total of 69 horses on-site (please refer to the 'Horse List' for 2024/25 which has been appended to this appraisal for information).

5.9 Whilst all animals and livestock require great levels of care to be provided to them by their owners, horses in particular require even greater levels of care (and time) to be afforded to them in order to ensure their welfare is maintained at as high a level as possible – particularly as they often have significantly higher monetary values than other animals and livestock.

5.10 As confirmed within the submitted Horse List, there are currently 46 'riding horses' on the farm, alongside a further 9 retired horses and brood mares, a further 5 'youngsters' and a further 9 liveried horses. Clearly, given the high numbers of valuable animals on-site at any one time, it is imperative for the proper functioning of the enterprise for there to be sufficient numbers of staff/workers on-site at all times to ensure that any unexpected situations concerning the animals on-site can be addressed and remedied as quickly as possible.

5.11 All mares on the holding used for breeding need to be monitored for ovulation during their cycle, and the workers at the farm are responsible for ensuring that the mares are monitored throughout pregnancy to ensure that they remain healthy, comfortable and free from stress. As with all the horses on-site, workers are responsible for monitoring the health, condition and welfare of the breeding mares year-round to ensure they remain in peak condition.

5.12 In-foal mares are at risk from infection with 'equine herpes virus' which can cause abortion. Equine herpes virus is common in young horses; thus pregnant mares need to be kept separately to younger horses which aren't in-foal. Avoiding unnecessary issues such as abortion is critical to the success of the breeding business operated from Springhill Farm. Indeed, as with any business, unnecessary losses can be ill afforded.

5.13 As horses become older their needs become greater and they may well require increased supervision and additional veterinary care. They may develop age related conditions, such as dental problems, and their immune system may become less efficient.

5.14 It is essential that a worker is available on-site day and night to assist with all equestrian duties, and crucially, any unexpected or emergency situations which occur outside of 'normal working hours'. Horses that are stabled require regular monitoring to ensure their safety and welfare. The effective running of a large equestrian enterprise requires different management operations at different times of the year, every day involving effective management and supervision and the need for the essential care of the animals. A summary of some of the managerial requirements which are

carried out by the business and its workers over a 12-month period (24 hours per day) are as follows:

- Feeding twice per day
- Preparation of the mares prior to the breeding season
- Administering Veterinary Medicines
- Regular hoof trimming and shoeing
- Registration of horses with Horse Passports
- Feeding morning and night for stabled horses
- Mucking out twice daily for stables horses
- Foaling
- Observing the general health of the horses every day
- Castrating colts
- Monitor horses for illness, laminitis, wounds and various other illnesses.
- Weaning Foals
- Exercising horses in work
- Hoof picking all horses
- Grooming
- Clipping winter coats during winter months
- Changing rugs dependant on weather
- Monitoring weight
- Bathing
- Fly spray during summer months
- Poo picking or spreading on grazed fields
- Monitoring of lame horses, often on box rest
- Electric fencing maintenance
- Collection of lost shoes in grazed fields
- Yard maintenance
- Water feeders
- Topping fields
- Teeth checks

5.15 As well as the riding, breeding, retired and youngstock horses on-site, Springhill Farm also has a livery setup for privately kept horses on the premises. The business has up to 13, having 9 at present. Liveries can vary in the level of services they offer. At Springhill Farm it is offered on a DIY basis where grazing/stabling/shelter is offered but owners are responsible for looking after their own horse. This has been a long-established use of the site. However, when owners are not present, the business has a welfare obligation to provide any care in an emergency, for example a sudden illness of a horse or in extreme weather conditions where the farm becomes inaccessible or unsafe to get to. There is also an expectation that the business would provide primary care during out of hours times, such as during the middle of the night, when many customers live too far away from the farm to reach the site in time to provide adequate care for their horses.

5.16 Being an enterprise in which animals are involved, some degree of 24-hour supervision is required for all the horses throughout the year. In this sense, the enterprise is no different to a traditional agricultural livestock farm; except for the crucial difference that horses are often significantly more valuable and prone to illness and injury compared to sheep, cattle, pigs etc.

5.17 Night-time welfare checks are carried out for all horses every night, during which time some horses also need to be fed and watered. An on-site presence outside of 'normal working hours' is also required in case of unexpected events such as horses escaping, injury, illness and for security purposes.

5.18 As such, there is clearly a functional need for an on-site presence to be provided at all times of the day and night in order to ensure the welfare of the on-site horses is maintained at all times.

5.19 Notwithstanding this, specifically surrounding foaling there are even greater requirements of the staff working on the enterprise, given the complications which can often occur during birthing and the risks involved. Therefore, during periods of foaling (which occurs year-round at Springhill Farm), even greater round-the-clock care needs to be provided for the farm's horses.

5.20 Assuming a foal is born without any major issues or complications, once they are born a whole new set of risks emerge. It is imperative that a worker checks the health of a foal once born, and assists if there are any issues. A check also needs to be undertaken to ensure the mother horse will 'accept' her foal and that the foal is safe. Checks need to be made in terms of the foal receiving an adequate amount of colostrum from its mother. If an inadequate amount of colostrum is taken on-board by the foal within the first 2-4 hours of life, its chances of survival are slim. Therefore, if additional colostrum needs to be given to a newborn foal, it is a worker's responsibility to bottle feed the foal, or administer the colostrum via a tube inserted directly into the stomach. Newborn foals also need to be vaccinated and their navels treated with an iodine solution to prevent infection.

5.21 The Applicant recently had an instance of a new foal being born during the winter; with the foal requiring round-the-clock care to ensure it made it past the first few days of life. It required supplementary milk feeding as its mother had insufficient milk to properly feed the foal for its first days, and this was only compounded by the cold weather experienced at the time – which is not uncommon at Springhill owing to its location. Given the Applicant's health issues, being essentially immobile some days due to her hip, there are both animal and staff welfare issues on the farm at present which would be remedied to a large extent with the construction of a second dwelling – meaning that another worker would always be on-hand no matter the time of day or night.

5.22 Foaling at Springhill Farm takes place year-round rather than in a block. Whilst it is possible to predict the general period during which a horse will foal, the exact timing of a foaling cannot be predicted and as such, on-site monitoring throughout the day and night is often required. Given that constant surveillance is required during a period of foaling, it is imperative that a worker is available at all times, and the only way in which this can realistically be provided is with a dwelling on-site within close proximity to the buildings and fields.

5.23 Whilst foaling is a specific example of where staff are often required to respond to a fast-changing situation on the farm (often outside of 'normal working hours') the functional need for an on-site worker presence is in no way only derived from foaling.

5.24 Other specific examples of times when an on-site presence is required over a 24/7 period include when animals escape their building or field/paddock, which can impact and/or cause injury to the public should they not be dealt with immediately, ill or sick animals who require immediate treatment but may require more than one worker to administer such treatment and the potential for worrying of the horses on the holding due to the site being situated within a rural area with a large number of dog walkers, for which it would be imperative that the workers were situated nearby to attend to any reports of such imminently and deal with it to reduce the impact on the animals.

5.25 Given the remoteness of Springhill Farm and its high elevation, it is particularly important to attend to all equine-related duties throughout the winter months without compromising animal welfare standards. During winter months, despite appropriate insulation being installed to prevent it, severe cold weather causes freezing of water troughs used by the horses housed indoors. This issue regularly requires attention during the night to prevent complete freezing of water sources and the welfare implications for the animals that may follow. It is important for a dwelling to be within walking distance of the farm, as during the winter road conditions are regularly icy overnight and as the location is extremely remote, the local roads that would be required to be driven in order to attend to the horses, in such cases as mentioned above, are not gritted and are therefore considered unsafe to be driven. Additionally, when snow falls a similar predicament to the above occurs, as roads are not gritted and are rarely (if ever) snow-ploughed, the farm does become inaccessible by vehicle, and without all staff being situated with adequate access, this could present serious welfare issues for the horses.

5.26 Contrastingly, during the summer months, although road access doesn't present an issue, being situated near to the farm is still necessary. With animals being housed outside and with ever-increasingly warm temperatures, water is a crucial part of that. Some of the fields that are grazed do not have access to mains water, and therefore water bowsers have to be filled and

transported manually to certain fields on the farm, which on very hot days can be required multiple times a day, including in the early morning and late at night. This would be a great inconvenience should workers have to reside away from the farm, especially during busy summer periods when harvesting takes place and the riding school is particularly busy. Indeed, during this year's extremely dry summer, there are several hours of extra work required on the farm per day given water shortages from the farm's private supply and the need to manually transport water to some paddocks to ensure that all animals receive sufficient amounts of water in the heat.

5.27 The functional needs of the enterprise for workers to be on-hand at any time of the day or night are therefore clear.

5.28 [redacted]

5.29 The Applicant's daughter does work on the enterprises at Springhill Farm as a Yard Manager, however does not live on-site due to there being no accommodation on offer for her [redacted]. Instead, [redacted] travels to and from the farm each day from elsewhere within the Ceiriog Valley – a situation which is far from ideal and leaves [redacted] as the sole worker on the farm outside of 'normal working hours'. As noted above, during periods of inclement weather (such as during periods of snowfall during the winter) the roads become treacherous, meaning that [redacted] has days when she is unable to make it to the farm to carry out her duties. This situation is untenable moving forwards due to the animal welfare issues it causes on the farm [redacted]

5.30 Given the range of issues on the holding which contribute towards there being a clear functional need for workers to be on-hand at all times of the day and the night (as detailed above), and especially owing to the Applicant's [redacted] the functional requirement for a second dwelling on the farm is clear in-line with the requirements of TAN 6.

5.31 Away from the functional needs of the equine business, both the farm business and the Bunkhouse business also have functional needs for an additional worker to be housed on-site. Indeed, whilst no sheep and cattle are farmed at Springhill anymore, there are 134 acres of farmland which needs to be appropriately managed and maintained to ensure it functions properly and to its full potential in terms of for the horses and in terms of cropping yields.

5.32 General needs of the farming enterprise relate to the management and upkeep of the grazing land; which involves fertilisation of the soil, aeration of the soil, rolling in spring, application of pesticides and herbicides to prevent thistles and nettles, 'topping', mowing, raking, baling, application of manure and harrowing to promote grass growth. In addition to this, the farm has an extensive network of both fences and hedgerows along field boundaries which require constant upkeep and repair/replacement to ensure they continue to provide effective barriers between field parcels. Given the Welsh Government's recently unveiled Sustainable Farming Scheme (SFS), it appears that the importance of hedgerow/tree planting and maintenance on farms in Wales will only grow – meaning a larger percentage of the working day will need to be spent on environmental schemes moving forwards.

5.33 There is also an essential functional need for a worker to reside on-site year-round in connection with the Bunkhouse tourist accommodation enterprise. The Bunkhouse's occupancy levels are high and the Google reviews for the accommodation demonstrate that the vast majority of guests staying on-site are highly satisfied with the accommodation and overall rural experience on-offer. It is imperative that a worker is on-site to serve the guests' needs and respond to issues (whether these be life threatening or business threatening). The Yard Manager is after all the first point of call for all issues relating to the Bunkhouse and the wider farm. Responding quickly ensures that their business is safeguarded, and a good level of service is maintained which is represented in their (good) reviews (which in turn encourages more business).

5.34 The success of a tourism enterprise is based upon satisfied customers and so prompt attention to detail is required and this cannot continue to be met with only the Applicant ([redacted] living on-site. There have been incidents which have necessitated an 'out-of-hours' response from a worker on the farm due to guests not knowing how to use the heating and lighting, not knowing how to light a fire, alarms going off unexpectedly, systems in the building malfunctioning and horses having escaped from their stables and being out on the yard. If there was a medical emergency or life-threatening situation then only having the Applicant living on-site could have serious implications [redacted] There therefore needs to be a worker readily available at all times. It is unreasonable to expect a worker to travel back and forth from a distant, off-site location to attend to these issues and emergencies.

5.35 This is notably given as an example which satisfies the functional test, and need for a dwelling – *"Such requirements might arise, for example, if workers are needed to be on hand night and day to deal with an emergency that would threaten the continued viability and existence of the enterprise without immediate attention"*.

5.36 The lack of a second dwelling at-site is therefore now actively negatively impacting the creativity and economic vitality of the rural enterprise. This is

discouraged by/in TAN6. Section 3 (Sustainable Rural Economies) of TAN 6 notes how *"strong rural economies are essential to support sustainable and vibrant rural communities. A strong rural economy can also help to promote social inclusion and provide the financial resources necessary to support local services and maintain attractive and diverse natural environments and landscapes"*.

5.37 This section adds further how *"planning authorities should support the diversification of the rural economy as a way to provide local employment opportunities, increase local economic prosperity and minimise the need to travel for employment". TAN 6 ultimately states that Local Planning Authorities "should include supporting the expansion of businesses that are currently located in the open countryside"*.

Labour Requirements

5.38 With regards the 'Time Test' Part 4.9.1 of TAN 6 states the following:

"If a functional requirement is established, it will then be necessary to consider the number of workers needed to meet it, for which the scale and nature of the enterprise will be relevant. Where there is currently no dwelling associated with the rural enterprise the worker for whom there is a functional need for new accommodation must be a full-time worker. With the exception of second dwellings on established farms, it must not relate to a part-time requirement, or a requirement that does not relate to the enterprise. If this is a second (or further) dwelling, all existing dwellings must also be occupied by full-time workers for whom it is essential that they also remain on site for functional reasons, or by workers and their dependents last employed in a rural enterprise".

5.39 As noted, the proposed will be the second dwelling on the holding, and the current dwelling house at Springhill Farm is occupied by a full-time worker (the Applicant).

5.40 The labour requirement for the equine side of the enterprise at Springhill Farm, obtained from standard data contained within the ABC Equine Business Guide (8th Edition, 2022) is provided below:

Enterprise	Standard Worker Days (/Head)	Total Standard Man Days
9 DIY liveries	12	108
46 school horses	113	5198
9 brood mares	76	684
5 youngsters	60	300
5 foals	35	175
Sub-total		**6465**
Less 50% (21+ horses)		**3233**
Add 10% maintenance		323
Add 15% management		485
Total		**4041**
Standard Worker Days/worker		278
Labour Requirement		**14.5**

Figure 2: Labour Assessment for the equine business

5.41 The ABC Equine Business Guide is a comprehensive resource for individuals and businesses involved in the equestrian industry, focusing on business management and costings. It provides detailed information on various aspects of running an equine enterprise, including financial management, legal considerations, and operational strategies. At Chapter 4, it includes a specific section on 'Labour and Staffing', and within this a sub-section titled 'Labour Planning'.

5.42 The data used to calculate a labour requirement for the equine business at Springhill Farm of 14.5 full-time equivalent workers has been taken directly from this section of the ABC Equine Business Guide.

5.43 There are not known to be any alternative or more accurate sources of equine standard man days data which could be used instead of the ABC Equine Business Guide, and the information used is very much considered to be equivalent to that of the Jon Nix Farm Management Pocketbook which is widely used and accepted for use as part of applications for dwellings on purely agricultural enterprises.

5.44 Given that the equine business alone has a requirement for 14.5 FTE workers (not including the standard man day data concerning the agricultural business and the Bunkhouse), the requirements of TAN 6 with regards the Time Test are met.

5.45 In reality, the business does not employ 14.5 FTE workers; with the actual workers listed below. However, it must be noted that the farming and equine

business operated from Springhill Farm does not operate in the same way as any other type of more conventional non-family-run business. It is not uncommon for the Applicant and members of her family to work exceptionally long hours (in excess of the 2225 hours per year included within the ABC Equine Guide definition of a 'labour unit') and to do this without paying themselves any additional wages. This is very much the nature of the business – being a family run enterprise with a large number of animals and customers which need to be cared for a looked after. It is impossible to compare the nature of the business and the way it operates to any form of more conventional business or indeed a public sector organisation.

5.46 The following lists the current workers on the enterprise:

[redacted] Owner
Lives on-site within the farmhouse at Springhill Farm

[redacted] – Yard Manager
Lives off-site within the Ceiriog Valley

[redacted] – Freelance Riding Instructor
Lives in [redacted]. Works between 5 – 15 hours dependent on bookings.

[redacted] – Freelance Ride Lead
Lives in [redacted]. Works between 5 – 15 hours dependent on bookings.

[redacted] – General worker across the Bunkhouse and Equine Business
Lives off-site [redacted]. Works 16 hours per week on average.

A further three self-employed stable grooms/hands also work at the stables (all of whom live in [redacted]y). However these are seasonal, casual, workers and their hours are not set.

Financial Soundness

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]ly afford to borrow the capital required, based upon its levels of profitability.

5.61 [redacted]

5.62 [redacted]

[redacted]

[redacted]

The Suitability & Availability of Alternative Accommodation

5.66 As noted, there is one dwelling house on the farm at present (lived in solely by the Applicant). The existing dwelling house is a traditional farmhouse and is not subject to an occupancy restriction. The Applicant, who works full-time on the enterprise, will continue to reside within the existing dwelling on the farm.

5.67 There are no redundant buildings capable of conversion on the holding to provide a dwelling house as an alternative to constructing a new dwelling house.

5.68 A search of Rightmove in July 2025 also found that there were no dwellings for either sale or rent within a 1-mile radius of the farm. Given the animal husbandry issues on-site and the large number of horses on the holding, together with the poor quality of the surrounding local road network and the frequency of inclement weather, a dwelling any further afield than 1 mile would not sufficiently meet the functional needs of the enterprise.

5.69 It is noted the Planning Officer dealing with the previous application on-site (reference P/2023/0372) stated within their delegated report that *"it has not been demonstrated whether the existing dwelling could meet the functional needs of the rural enterprise, for example an appropriate sized and scaled self-contained extension to the dwelling"*.

5.70 The existing farmhouse at Springhill Farm is noted to not be of a particularly large scale; being a traditional, stone, upland farmhouse. Space within the dwelling is therefore noted to be limited, and there would be insufficient floor space internally to provide two separate dwellings capable of housing two different families.

5.71 This would mean that large-scale extensions to the dwelling would need to be provided in order for two dwellings to be created. Several issues would exist with this; principally in practical terms that insufficient space exists around the dwelling in which to build sufficient extensions. Indeed, the dwelling is 'boxed-in' by surrounding buildings. Whilst an extension could be erected on the dwelling's principal elevation, this would impact upon the dwelling's existing attractive façade, which would likely be at odds with the policy requirements outlined within UDP Policy GDP1 and Policy DM1 of the unadopted LDP in terms of design and impacts upon the character of the existing building.

5.72 Furthermore, notwithstanding the design issues, the extent and scale of extensions required to the dwelling to provide an additional unit of accommodation would be unacceptable in-principle in accordance with the requirements of UDP Policies H4 and GDP1 and Policy H7 of the unadopted LDP.

5.73 In any case, notwithstanding the above, planning policy does not set-out a preference in this circumstance for an existing dwelling to be extended and altered rather than a new dwelling to be provided.

5.74 Indeed, the TAN 6 Practice Guidance for Rural Enterprise Dwellings at Paragraph 6.1 reads:

"Given that there is a general policy of restraint on new residential development in the countryside, there is an underlying theme to the Rural Enterprise Dwelling policy that, even where there is a functional need to house a worker, every opportunity should be explored to ***avoid creating new development****. In the testing of rural enterprise dwelling proposals it is necessary for applicants to demonstrate, and for local planning authorities to be assured, that no reasonable alternative to a new dwelling is available".*

5.75 The LPA's suggestion of extending and subdividing the existing dwelling house would still create 'new development' and as such in policy terms is not preferable to the creation of a new dwelling. The application has fully justified the location and siting of the proposed dwelling house and has outlined that there are no feasible alternatives.

5.76 It is therefore clear that there are no alternative dwellings or buildings suitable for conversion within sufficient proximity to the holding unit to meet the functional needs of the enterprise.

6.0 Conclusion

6.1 This application requests Outline planning permission for the construction of a rural enterprise dwelling on-site at Springhill Farm.

6.2 On the basis of the information provided by the Applicant, there is a clear functional and welfare need for an additional rural worker to live on the holding in order to provide the requisite supervision of the enterprises on-site at Springhill Farm and to undertake essential animal husbandry duties outside of normal working hours.

6.3 The proposal is compliant with the requirements of TAN 6 and the TAN 6 Practice Guidance for Rural Enterprise Dwellings, in that it provides a residential dwelling for an essential rural worker to meet the functional needs of a rural enterprise, where there are no alternative dwellings or buildings capable of conversion which could meet the need identified. It is therefore respectfully requested that Outline planning permission be granted for the development.

7.0 Appendices

Appendix 1: Horse List

Springhill Farm Horses 2024/25

Riding Horses

1. Acky. Bay Gelding. 24yrs. 13.1hh. Welsh. LIGHTWORK ONLY.
2. Alfie. Grey Gelding. 16yrs. 14.1hh. Welsh x
3. Ambrose. Appaloosa Gelding. 15yrs. 15.1hh. Appaloosa
4. Amira. Piebald Mare. 8yrs. 15hh. Cob x TB
5. Arianrhod. Bay Mare. 9yrs. 16hh. ISH
6. Badger. Piebald Gelding. 23yrs. 15hh. Irish Cob. LIGHTWORK ONLY.
7. Barb. Piebald Mare. 11yrs. 14hh. Cob
8. Ben. Piebald Gelding. 16yrs. 15hh. Irish Cob
9. Blossom. Bay Mare. 12yrs. 13hh. Welsh x
10. Charlie. Chestnut Gelding. 5yrs. 16.3hh. ID
11. Danny. Grey Gelding. 16yrs. 13.1hh. Welsh x
12. Donny. Piebald Gelding. 15yrs. 15hh. Irish Cob (Working Livery)
13. Dylis. Bay Mare. 14yrs. 14.2hh. Fell x
14. Ezra. Skewbald Gelding. 12yrs. 13.3hh. Cob
15. George. Dark bay Gelding. 24yrs. 16.1hh. Welsh x TB. LIGHTWORK ONLY.
16. Haf. Bay Mare. 9yrs. 13.2hh. Welsh
17. Jack. Skewbald Gelding. 17yrs. 14.3hh. Irish cob
18. Jake. Roan Gelding. 17yrs. 13.3hh. Welsh x
19. Janey. Skewbald Mare. 16yrs. 14.2hh. Cob
20. Jasper. Dark bay Gelding. 9yrs. 13.3hh. Cob
21. Kerrigan. Bay Gelding. 20yrs. 15.1hh. ID x Connemara. LIGHTWORK ONLY.
22. King. Bay Gelding. 17yrs. 16.2hh. ISH
23. Libra. Bay Gelding. 18yrs. 15.2hh. ID x Welsh
24. Llety. Skewbald Mare. 13yrs. 15.1hh. Welsh x
25. Maggie. Piebald Mare. 21yrs. 16hh. Irish cob
26. Mandy. Bay Mare. 18yrs. 13.1hh. Welsh x
27. Meg. Bay Mare. 17yrs. 15.3hh. Cob
28. Merlin. Dark bay Gelding. 7yrs. 12.2hh. Cob
29. Missy. Bay Mare. 21yrs. 14.3hh. Welsh x
30. Misty. Grey Mare. 18yrs. 13hh. Cob
31. Molly. Dark bay Mare. 17yrs. 14hh. Cob x (Working Livery)
32. Oreo. Piebald Gelding. 10yrs. 14.1hh. Cob (Working Livery)
33. Onyx. Bay Mare. 20yrs. 15hh. TB x Welsh
34. Pearl. Grey Mare. 18yrs. 15hh. ID x Connemara
35. Phoebe. Grey Mare. 20yrs. 16.3hh. ID x
36. Poppet. Bay Mare. 22yrs. 14.3hh. Cob x. LIGHTWORK ONLY.
37. Ricco. Grey Gelding. 14yrs. Spanish
38. Rocky. Piebald Gelding. 9yrs. 14.1hh. Irish Cob
39. Ronnie. Dark bay Gelding. 13yrs. 14.2hh. Cob
40. Rudi. Spotty Gelding. 23yrs. 15hh. Appaloosa. LIGHTWORK ONLY.
41. Sapphire. Bay Mare. 14yrs. 15.1hh. TB x
42. Savannah. Bay Mare. 11yrs. 14.1hh. Cob
43. Star. Piebald Mare. 11yrs. 14.2hh. Cob
44. Ted. Bay Gelding. 19yrs. 14.3hh. Welsh x
45. Tegwyn. Chestnut Gelding. 15yrs. 14.3hh. Welsh
46. Tom. Bay Gelding. 5yrs. 15hh. Irish cob

Springhill Farm Horses 2024/25

Not in work/Retired/Brood Mare

1. Gemini. Bay Mare. 21yrs. 15.2hh. TB x Welsh. Foaled Sept 2022 – Virgo. Bay Colt.
2. Gloria. Bay Mare. 11yrs. 15.3hh. ID
3. Hazel. Dark bay Mare. 28yrs. 16.1hh. ID
4. Lily. Dark bay Mare. 18yrs. 12.2hh. Welsh
5. Maizie. Grey Mare. 20yrs. 16hh. Cob
6. Mali. Skewbald Mare. 11yrs. 15.2hh. TB x Cob
7. Mini Morgan. Dark bay Gelding. 7yrs. 12hh. Cob
8. Sioned. Bay Mare. 25yrs. 16hh. ID x TB
9. Squire. Bay Gelding. 29yrs. 15.3hh. TB x

Youngsters/Not backed

1. Apollo. Dark Bay Gelding. 2yr. 14hh. ID x Cob
2. Florence. Roan Mare. 7yrs. 13.3hh. Appaloosa x
3. Gwen. Black Mare. 4yrs. 15hh. Irish cob
4. Ianto. Dun Colt. 7months (born June 2024). Out of Gwen and Welsh D
5. Virgo. Dark Bay Gelding. 2yr. 14hh. ID x

Liveries

1. Awel. Dark bay Mare. 18yrs. 14.2hh. Welsh
2. Calypso. Dun Mare. 14yrs. 15.1hh. Welsh x
3. Daisy. Grey Mare. 12yrs. 14.1hh. Cob
4. Dewi. Bay gelding. 17yrs. 13.3hh. Welsh
5. Harriet. Skewbald Mare. 10yrs. 14.2hh. Irish cob
6. Ivor. Dark bay Gelding. 20yrs. 16hh. Welsh x TB
7. Nelly. Bay mare. 14yrs. 12.2hh. Welsh
8. Spartacus. Chestnut Gelding. 20yrs. 15hh. Welsh
9. Sydney. Piebald Gelding. 4yrs. Irish cob

Appendix 2: [redacted]

[redacted]

Tel. 01691 674792
Email. info@kcaccountancyservices.co.uk
kcaccountancyservices.co.uk

KC Accountancy Services
Youth & Community Centre
High Street, Llanfyllin
Powys SY22 5DB

aat AAT Licensed Accountant

Appendix 3: [redacted]



