Planning Statement

Outline Planning application for the proposed erection of an Agricutural Workers Dwelling

Land at Manley Hall Farm, Erbistock, Wrexham, LL13 0DH

September 2025

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PROJECT
Outline Planning application for the proposed erection of an agricultural workers dwelling at Manley Hall Farm, Erbistock, Wrexham LL13 0DH

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Contents

1.0 Introduction 1
2.0 Site Location and Context 3
3.0 The Proposed Development 8
4.0 Planning Policy 11
5.0 Planning Appraisal 14
6.0 Conclusion 22

1.0 Introduction

1.1 This supporting statement has been prepared and submitted by Berrys on behalf of SR Lewis in respect of an outline planning application for the erection of an agricultural workers dwelling on land at Manley Hall Farm in Erbistock, Wrexham, LL13 0DH. This document should be read alongside the Supporting Statement produced by Vicky Price MRICS FAAV.

1.2 This statement should be read in conjunction with the other documents which have been submitted as part of this outline planning application submission, these include;

- Site Location Plan
- Proposed Site Plan
- Supporting Statement
- Preliminary Ecological Assessment
- Green Infrastructure Statement
- Financial Documents
- Rightmove Search
- Application form

Background to Proposal

1.3 The application seeks permission to build a rural enterprise dwelling at Manley Hall Farm to support the expansion and reconfiguration of SR Lewis's farming business.

1.4 SR Lewis is a three-generation family partnership engaged in dairy, calf rearing, beef cattle, sheep farming, and crop production, operating over 505 acres across several sites.

1.5 The business has expanded over the years to include calf and young stock rearing to fat cattle. A separate biosecure calf rearing facility is now required at Manley Hall Farm (167 acres) to prevent TB transmission and improve

livestock management. This will be on a separate holding to the dairy and finish cattle herds. The reconfiguration will ensure the safe rearing of the young stock, prevent issues of cross contamination like Tuberculosis (TB) and to help secure their commitment to producing home grown beef cattle to a high standard.

1.6 [redacted]

1.7 [redacted]

1.8 [redacted]

1.9 As there is a requirement to create a separate isolation unit for the calf rearing enterprise at Manley Hall Farm, there is a need for the business to have a farm workers dwelling located on site for [redacted] to manage the enterprise. Manley Hall Farm has been selected as it has the existing infrastructure in place to accommodate the rearing of the calves.

1.10 The demands on the farming business require both [redacted] to be available and residing on the farm holdings fulltime as part of the successful operation of both the dairy herd at Manor Farm and calve rearing enterprise at Manley Hall Farm.

2.0 Site Location and Context

2.1 The application site is located on Manley Hall Farm. Manley Hall Farm is located within the Parish of Erbistock, situated to the west of the settlement, accessed via a long driveway to the hall, farm buildings and 5no. residential dwellings.

2.2 The applicants have access to 75 acres at Manley Hall Farm and 450 acres at Manor Farm. Manor Farm is a listed building and is tenanted, for this reason it would not possible to provide any additional accommodation in this location.

2.3 The existing farmhouse at Manor Farm is occupied by [redacted] and is part of the tenancy agreement at Manor Farm. The current housing and background to the business is set out within the supporting statement.

2.4 The livestock enterprise of the farm is split across the 2 sites for welfare and biosecurity reasons. The existing livestock buildings at Manley Hall Farm will be used as a separate facility for the rearing of calves, with the existing buildings at Manor Farm continuing to be used by the existing dairy herd and finished fat cattle enterprise.

2.5 The location of Manley Hall Farm is shown in figure 1 below.



Figure 1. Aerial view of site.

2.6 Manley Hall Farm is a listed property with a range of traditional buildings all facing the courtyard. These have been converted to residential accommodation and are all in separate ownership.

2.7 The site itself consists of a range of traditional agricultural buildings – part of which are in part ownership of the Lewis family and part owned by third parties, plus several modern agricultural buildings, which are used to house calves and fodder. The plan below shows the location of the site and buildings to the east of the blue line all within the ownership of the applicant. Note the gable ends of the traditional barn are within the applicant's ownership, however they are too small to warrant conversion.

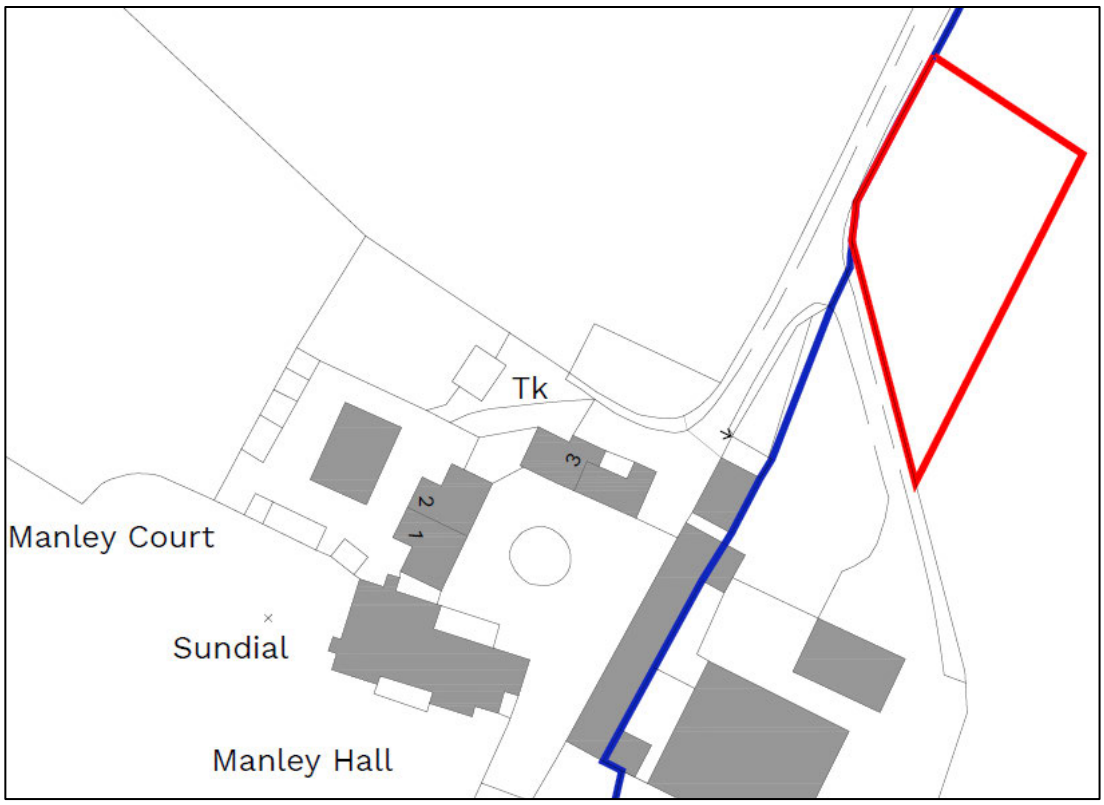


Figure 2: Location plan showing the site edged in red and land ownership edged in blue –the land to the east of the blue line is under the applicant's ownership.



Figure 3. Site Photograph of modern agricultural buildings which are in use

2.8 The remaining dwellings (to the west of the blue line shown on the location plan) at Manley Hall Farm are under third party ownership and nothing to do with the farming operations on the eastern side of the site.

2.9 Manley Hall Farm and the associated barn conversion properties all face into a central courtyard area and do not overlook the farming activities to the rear (east) of the site. The young calves being reared on the farm require checking, feeding and monitoring at least twice a day and this often takes several hours to do. They are not supervised or overlooked by anyone else living nearby which has caused problems with welfare on several occasions when the health of an animal has deteriorated and for some reason and supervisions has taken place for several hours.

2.10 Within the traditional barn range that runs along the western side of the ownership boundary, the applicants own the end gables of the barns, which are used for the storage of fodder and farm equipment and medicines for the longhorn cattle and calves reared on the site. The end gable of each barn measures approx. 30sqm which is not large enough to be converted to

residential use. A new build development is therefore the only option available in this location as all other modern buildings are in use for agricultural purposes.



Figure 3. Photographs of Gable Ends of traditional barns (owned by applicant)

2.11 The proposed site has good access to the farm buildings and will utilise existing services such as electricity and water which are already in place. The proposed new dwelling will be sited along the access road to the farm buildings, between an existing dwelling and the Manley Hall Farm complex.



Figure 4. Approx. location of site shown along driveway.

2.12 The proposed site would be within sight and sound of the farm buildings and would have a neutral impact upon the setting of Manley Hall Farm, against the backdrop of the farm buildings, rather than the historical buildings.

2.13 As Manley Hall Farm is a listed building, the setting of the proposed dwelling in the context of the hall has been carefully and sensitively considered. The new dwelling would not harm the setting of the historic buildings and be read as a separate planning unit.

2.14 In addition, the site is located within Floodzone 1 and therefore, there will be no flood risk.

3.0 The Proposed Development

3.1 The proposal is for the erection of an agricultural workers dwelling. The proposed permanent agricultural workers dwelling is required for the purposes of agriculture, to accommodate [redacted] at the calf rearing unit at Manly Hall Farm.

3.2 The proposed erection of a rural enterprise dwelling at Manley Hall Farm, Erbistock is in connection with the re-configuration of the established farming practice, SR Lewis. The dwelling is required to allow the applicant to be readily available at all times, and to deal with emergencies, to manage the welfare of the livestock and to assist with the security of the farm, machinery, commodities and animals against trespass, theft and vandalism. The existing calf rearing enterprise is operating well and proposals are in place to expend the herd further. A farmers workers dwelling is required in order for the owner to manage the enterprise.

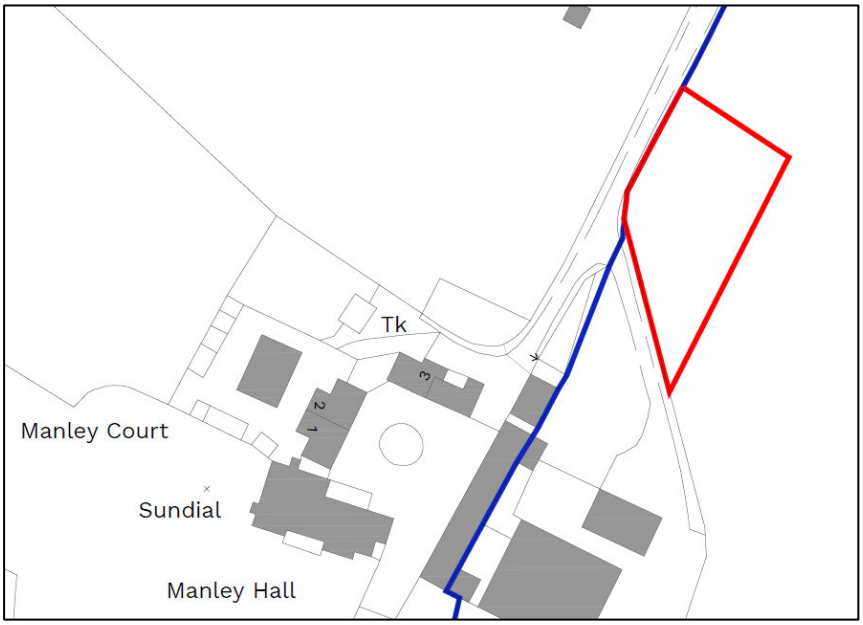


Figure 5. Site Location Plan

3.3 The proposed development site has been identified and selected as the most suitable location for the dwelling to be sited. There are existing services available on site for the dwelling to utilise, it would be accessed off an

existing farm access track and it is located in outside of any visually sensitive areas, away from the listed hall.

3.4 The design and appearance of the dwelling will be in keeping with the surrounding rural context. The proposed site location ensures that the dwelling will blend into the site's context and will not appear visually intrusive or detract from Manly Hall.

3.5 The proposed dwelling will not impact upon the residential amenities of the occupiers of nearby properties or negatively impact the functionality and operation of the working farm.

3.6 The site will be accessed from the private road that leads from the Manley Hall Road to Manley Hall. Visibility is sufficient in both directions.

3.7 The proposed development is not envisaged to result in an adverse intensification on the highway.

Landscaping and Ecology

3.8 The development will be designed to enhance the biodiversity value of the land along the eastern and south-eastern boundary, with dense planting.

3.9 There are mature trees on the western side of the red line area which would be retained at all times.

3.10 The proposed dwelling would be located entirely within the grassland, requiring no removal of features of ecological or connective value such as mature trees. The loss of a relatively small footprint of low value agricultural rotation land is of no significant consequence to local wildlife, and the connective infrastructure around the site will not be hampered by the works.

3.11 A Green Infrastructure Statement has been submitted alongside this application. The Green Infrastructure Statements are a requirement under the revised Chapter 6 of Planning Policy Wales (PPW) 12th edition.

3.12 As part of this statement, the ecologist advised a series of biodiversity enhancements. These include bat boxes, bird boxes and new planting. These would be monitorted annually.

3.13 A preliminary ecological assessment was submitted alongside this application. The assessment concluded that there are no ecological constraints on site.

3.14 Please refer to *Green Infrastructure Statement BJ25-234.1* and *Preliminary Ecological Assessment BJ25-234.1* for further information.

4.0 Planning Policy

4.1 The starting point for consideration of this application is Section 38 (6) of the Planning and Compulsory Purchase Act 2004, insofar as the determination must be in accordance with the Development Plan, unless material considerations indicate otherwise.

Planning Policy Wales 2024 Edition 12 (PPW)

4.2 Welsh national planning policy is contained within Planning Policy Wales (PPW), Edition 12, which is supplemented by the adopted Technical Advice Notes (TANs).

4.3 A primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.

4.4 PPW emphasises that at the heart of the planning system in Wales is a commitment to delivery, and to maximise the contribution of the planning system to achieve the goals set out within the Well-being of Future Generations Act.

4.5 PPW states that the planning system should enable development which contributes to long term economic well-being, making the best use of existing infrastructure and planning for new supporting infrastructure and services.

4.6 Paragraph 2.27 of PPW states that planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process.

4.7 Paragraph 3.38 of PPW states that the countryside is a dynamic and multi-purpose resource, and that fostering adaptability and resilience will be a key aim for rural places in the face of the considerable challenge. Further to this, paragraph 5.6.1 states that the rural economy must develop a wide base if it

is to be adaptable and resilient to the challenges it faces now and in the future.

4.8 In addition, in paragraph 5.6.8, it states that local authorities should adopt a constructive approach towards agricultural development proposals, especially those which are designed to meet the needs of changing farming practices.

4.9 In relation to the technical advice notes, the following are most relevant to this proposal:

- TAN5: Nature Conservation and Planning
- TAN6: Planning for Sustainable Rural Communities, July 2010
- TAN 6: Practice Guidance: Rural Enterprise Dwellings, December 2011
- TAN12 Design
- TAN18 Transport

Wrexham Local Development Plan 2013- 2028

4.10 At a local level, planning policy is set out within the Wrexham County Borough Local Development Plan 2013- 2028 which was adopted in December 2023.

4.11 The following policies are viewed as relevant to this proposal.

- SP2- Location of Development- New development is directed to the defined settlement limits and employment areas as identified on the proposals map. Land outside of any defined settlement limit or employment area as shown on the Proposals Map is classed as open countryside where, in line with paragraph 3.60 of Planning Policy Wales (edition 11, February 2021)59, development will be strictly controlled.
- SP14- Natural Environment
- SP150 Historical and Cultural Environment

- Policy H7 Housing in the countryside- Proposals for housing development outside defined settlement limits will only be permitted where: It is for the purposes of agriculture, forestry or other rural enterprise as defined in TAN6.
- Policy NE1- International and National Nature Designations
- Policy NE5- Special Landscape Area
- NE6- Waste Water and Water Quality
- DM11- Development Management
- T1- Transport

Supplementary Planning Guidance (SPG)

4.12 The following SPGs are considered relevant to this proposal:

- LPG2 Agricultural Appraisals
- LPG13 Housing in the Countryside
- LPG16 Parking Standards
- LPG17 Trees and Development
- LPG32 Biodiversity and Development

5.0 Planning Appraisal

5.1 The key planning considerations in respect of this development are as follows:

- Principle of development
- Requirements of TAN6
- Other Planning Matters

The principle of development

5.2 The proposed site lies outside of the settlement limit where Policy SP2 of the LDP supports the principle of development. As such, the proposals must accord with Policy H7 of the LDP

5.3 Policy H7 states: *Proposals for housing development outside defined settlement limits will only be permitted where:*

i. It is for the purposes of agriculture, forestry or other rural enterprise as defined in TAN6; or
ii. It involves the replacement of an existing dwelling (see policy H8); or
iii. It involves the subdivision of an existing dwelling, provided the dwelling is capable of subdivision without major extensions tantamount to the erection of an additional dwelling or dwellings; or
iv. It involves the conversion of an existing non-residential building (see policy H9); or
v. The proposal is for affordable housing rural exception sites on land adjoining the settlement limits (see policy H3); or
vi. One Planet development as defined in TAN6.

5.4 This proposed dwelling is for the purpose of agriculture and running a rural enterprise as defined in TAN6. The proposed dwelling would be sited at Manley Hall Farm, Erbistock and is required to allow the applicant to be readily available at all times, and to deal with emergencies, to manage the welfare of the livestock and to assist in the protection of the farm, machinery, commodities and animals against trespass, theft and vandalism. Due to the proposals to develop a calf rearing enterprise at the farm, a

farmers workers dwelling is now required in order for the owner to manage the enterprise.

5.5 Para 4.3.1 states that one of the few circumstances in which new isolated residential development in the open countryside may be justified is when accommodation is required to enable rural enterprise workers to live at, or close to, their place of work. As set out within para 4.2.37 and 4.2.38 of the PPW, ED12, there is a genuine need for the rural enterprise dwelling to be sited in this location.

Requirements of TAN6

5.6 As set out in paragraphs 4.71 of TAN6, all tests have been met. These are set out below:

- **The functional test** to provide evidence of whether there is a need for a resident worker for the proper functioning of the enterprise.
- **The time test** to provide evidence of the labour requirement for the worker who is working on the justifying enterprise.
- **The financial test** to provide evidence of the economic sustainability of the justifying enterprise and identify the size of dwelling that the enterprise can sustain, ensuring that the size of the dwelling is commensurate with its functional need and financial justification.
- **The other dwellings test** to identify whether there is an existing dwelling or building suitable for conversion on the enterprise or dwelling in the locality that could meet the identified functional need.
- **Other normal planning requirements** test to demonstrate that the dwelling is suitably located to fulfil its identified need and to minimise impact on the wider environment.

Functional Test

5.7 The submitted 'Supporting Business Statement' report sets out why it is essential that a rural workers dwelling is located on this site.

5.8 Livestock require a high level of care and attention to detail, not only in the day-to-day maintenance and feeding but simply in observation and ensuring each animal is healthy.

5.9 There is a constant and demanding need for both [redacted] to be located at Manor Farm with the milking herd and finishing cattle unit, along with [redacted] managing the calf rearing and youngstock unit, 7 days a week and 24 hours a day.

5.10 Alongside daily milking and calf rearing, there is an essential need for [redacted] to be living on site for the welfare of the animals. Living within sight and sound of livestock is important to being able to ensure Freedoms 1, 2, 3 and 5 are met. These are the codes of good agricultural practise. Compliance with animal welfare requirements is of extreme importance.

5.11 As the cattle enterprise continues to expand as part of the business plan for high quality milk and meat products it is vital that both [redacted] are located on each farm unit to deal with any emergencies, animal welfare, and security from theft, which can have a direct impact on the animal's health as well as financial implications for the business. It is, therefore, important that the calves and youngstock are continually monitored by observation, which cannot take place if [redacted] is not residing at Manley Hall Farm.

5.12 Livestock management demands a consistently high level of care, attention, and skilled observation. Beyond routine feeding and maintenance, the welfare of each individual animal relies on continuous monitoring to identify illness, distress, or abnormal behaviour at the earliest possible stage. This level of vigilance is only achievable with a farm worker living on site.

5.13 The operational structure of the farm requires both [redacted] to be present on their respective units seven days a week, twenty-four hours a

day. [redacted] role at Manor Farm involves milking the herd twice a day for 3no. hours at a time, and tending to the finishing cattle unit, while [redacted] is responsible for the calf-rearing and youngstock enterprise. These activities are labour-intensive and time-critical, with many tasks such as calving, neonatal care, and responding to sudden health issues occurring unpredictably and often outside normal working hours.

5.14 [redacted], residing at Manley Hall Farm is essential to meeting the recognised animal welfare standards. Living within sight and sound of livestock enables immediate intervention when animals are distressed, unwell, or at risk, ensuring compliance with welfare legislation and safeguarding the health and productivity of the herd.

5.15 As the cattle enterprise continues to expand in line with the business plan for high-quality milk and meat production, the need for both [redacted] to be located on their respective farm units becomes even more critical. Their presence is vital not only for animal welfare and emergency response but also for security, as theft or interference can have serious welfare and financial consequences.

5.16 In addition to livestock care, the wider farm operation requires rapid, on-site decision-making to protect crops from frost events, equipment failures, and other unforeseen emergencies that can occur at any hour.

5.17 All of these risks directly affect the viability and profitability of the holding and cannot be effectively managed without a full-time, agricultural worker living on site.

5.18 Continuous observation of the health of calves and youngstock is fundamental to their survival, growth, and long-term productivity. Such monitoring cannot be achieved if [redacted] is not residing at Manley Hall Farm. The proposed agricultural worker's dwelling is therefore essential to maintaining the functional efficiency, viability and economic sustainability of the farm.

5.19 In summary, the proposed dwelling is required to provide the requisite supervision of the calf and youngstock enterprises and to undertake essential husbandry duties and other management requirements outside of normal working hours. It is fundamental for the welfare of the livestock that standards are maintained to a high level to continue to provide quality produce, which can only be achievable from both [redacted] residing on holdings at Manor Farm and Manley Hall Farm, 24 hours a day, seven days a week.

Time Test

5.20 As a functional requirement is established, the number of workers that need to be present was then calculated using the Standard Man Day calculation.

5.21 This calculation shows that the business has sufficient work and a functional requirement for over six full time workers.

5.22 As such, one person would be required to be on the youngstock unit 24 hours a day, seven days a week. Please refer to the submitted 'Supporting Business Statement' for a full farm business appraisal.

Financial Test

5.23 As set out within paragraph 4.10.1, The rural enterprise and the activity concerned should be financially sound and should have good prospects of remaining economically sustainable for a reasonable period of time.

5.24 Evidence of the economic performance of the business has been submitted to demonstrate the economic sustainability. Accounts for the last three years have been analysed for the farming business and are available to view by the Council, as confidential documents should they be requested. These accounts confirm the viability of the business. It can be concluded that the business has been planned on a sound financial basis.

5.25 It is evident that the business has a reasonable prospect of providing a market return and the applicants can afford to build and maintain the dwelling. The business demonstrates clear evidence that the current

business activities, including the requirement for a farm worker dwelling at Manley Hall Farm, have been budgeted and planned on a sound financial basis.

5.26 Therefore, it can be concluded that the farming practice is financially sound and has a reasonable prospect of remaining so for at least 5 years.

5.27 [redacted]

Other Dwellings

5.28 As mentioned in section 2 of this statement and in the submitted 'Supporting Business Statement', there are no other existing dwellings at Manley Hall Farm or any other existing accommodation in the area which is available for the occupation.

5.29 A comprehensive search of the residential market has been undertaken, for both properties to purchase and those to rent. This has been analysed against the budgeted earnings of the labour employed by the business. The potential affordable rent would be in the region of £692 per month (30% of earnings) and the affordable purchase price would be £90,000 (3x earnings).

5.30 We are not aware of any properties available to rent within the immediate surrounding area. It is likely that should any properties become available to rent, then these will not provide security for long term occupancy.

5.31 We have also undertaken a rightmove search of the area. The search was based on a 3 mile radius from the proposed site.

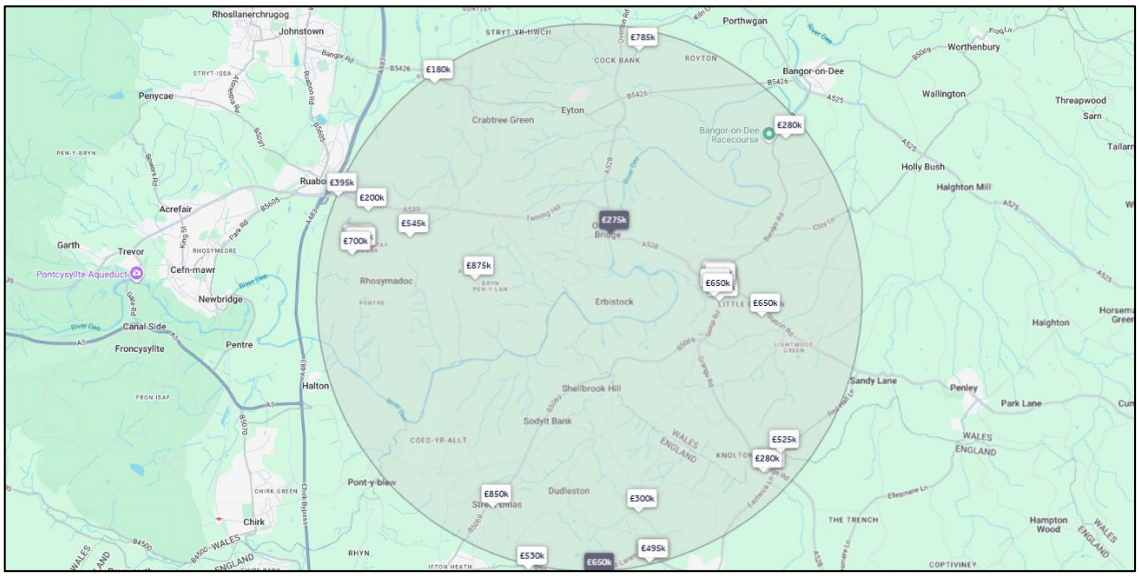


Figure 6. Search Radius for Rightmove search

5.32 The Building Cost Information Service indicates that the proposed dwelling will cost in the region of £120,000 to £140,000 to fully build out, including professional fees. There are no suitable properties available within the surrounding area to purchase at that level.The cheapest properties currently available on the open market are located in Overton. This is too far from the site and out of budget.

Other Planning Matters

5.33 As well as the above, all other planning requirements can also be satisfied.

5.34 The site lies within a Special Landscape Area, where LDP policy NE5 is applicable. The proposed siting and scale of the dwelling has been symapthecally and sensitively placed to prioritise landscape conservation and enhancement.

5.35 Landscaping will be confirmed at the reserved matters stage however, with proposed planting, it is deemed that the application will comply with policy LPG17 and LPG32 of the SPGS as well as policy SP14 of the local plan.

5.36 The proposed dwelling will be a self build and therefore, BNG is not required at this stage.

5.37 The siting of the proposed dwelling has been proposed to be located closely to the activities for which there is a need. The new dwelling would be sited in close proximity to existing buildings and in the case of dwellings for agricultural enterprises, it would not be isolated from the farmstead or in a location that would encourage farm fragmentation.

5.38 The proposed dwelling will utilise an existing access.

5.39 The outline application development site is situated with close proximity to Manley Hall.

5.40 Unlike the late C20 barn conversions, the proposal site is not directly visible from the Hall, and will not alter the experience of the building itself.

5.41 Modern residential buildings are within the existing setting of the driveway approach to the building and form a rural domestic setting to the former farmhouse.

5.42 To prevent over-domestication and a loss of the rural agricultural character, conditions may be considered to ensure the final design of the agricultural worker dwelling reflects a suitable local vernacular style or rural workers' dwelling, further helping to preserve the remaining agricultural setting of the Hall.

5.43 Therefore, it can be considered that the proposed dwelling will have limited impact on the surrounding landscape. All design matters will be confirmed at a later stage but it is envisaged that policy SP15 will be met.

5.44 Drainage will also be covered at a separate design stage.

6.0 Conclusion

6.1 The proposal seeks outline planning permission for a rural worker dwelling at Manley Hall Farm. Based on the supporting information provided, there is a demonstrable and essential need for a dwelling.

6.2 The dwelling is required to allow [redacted] to be readily available at all times, as is required for the successful running of the livestock enterprise and to deal with emergencies, to manage the welfare of the livestock and to assist in the protection of the farm, machinery, commodities and animals against trespass, theft, and vandalism.

6.3 On the basis of the information provided and given the nature and scale of the existing farming activities, there is an essential need for [redacted] to live on site in the proposed dwelling. This is to provide the requisite supervision of the calf and youngstock enterprises and to undertake essential husbandry duties and other management requirements outside of normal working hours.

6.4 The proposed development aligns with National and Local Planning Policy, including Planning Policy Wales, and clearly meets the criteria for an agricultural worker's dwelling. Therefore, there is a clear need for an agricultural dwelling at Manley Hall Farm and this application should be supported to ensure continued viability and security for the agricultural enterprise.

6.5 Furthermore, the operational demands of the farm (particularly the intensive nature of calf rearing, youngstock management, and the expanding cattle enterprise) require continuous, on-site oversight that cannot be delivered from an off-site location.

6.6 The welfare needs of livestock, including the requirement to meet recognised agricultural welfare standards, depend on immediate intervention when issues arise, many of which occur unpredictably and outside normal working hours. In addition, the wider functioning of the farm, including the need to

respond swiftly to emergencies such as equipment failure, adverse weather events, and security risks, reinforces the necessity for a full-time, tied worker to reside at Manley Hall Farm.

6.7 The presence of a dedicated agricultural worker on site is therefore fundamental to safeguarding animal welfare, maintaining operational efficiency, and supporting the long-term sustainability and profitability of the enterprise.