

Rural Enterprise Appraisal

Land at Garreg Llwyd
Froncysyllte
Wrexham
LL20 7RY

Outline application for the erection of a rural enterprise dwelling with all associated works (all matters reserved)

EW & M Jones

PRIVATE & CONFIDENTIAL

June 2026

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1.0 Introduction

1.1 Roger Parry & Partners LLP has been commissioned by EW & M Jones (the Applicant) to provide a Rural Enterprise Dwelling / Agricultural Appraisal of the requirement for a new rural enterprise worker's dwelling on the agricultural holding and business at Garreg Llwyd, Froncysyllte, Wrexham, LL20 7RY ("the Application Site").

1.2 This appraisal is submitted in support of an outline planning application for the development of a single rural enterprise dwelling, a detached garage, the installation of a package treatment plant and all associated works. All matters are reserved for future consideration (access, appearance, landscaping, layout and scale).

1.3 This outline application follows the refusal of a similar outline planning application in June 2025 for the same development on-site (reference P/2021/0701). The previous application was refused for the following reason:

"Insufficient justification has been put forward to demonstrate the functional and financial need for a second dwelling/rural enterprise dwelling, the long term viability of the rural enterprise which the dwelling is intended to support, that the existing dwelling could not be adapted to meet the functional needs of the enterprise or that there are no other alternative options for accommodation within close proximity of the site. The development fails to accord with Technical Advisory Note 6 Paragraph 4.4.1 (a) (c) and (d). Insufficient justification has therefore been put forward to demonstrate an essential need for the erection of a new dwelling in the countryside in support of a rural enterprise. Therefore the development does not accord with policy H7 of the Wrexham Unitary Development Plan".

1.4 This application seeks to overcome the issues and areas of concern raised previously by Wrexham County Borough Council ("the Local Planning Authority").

1.5 The statement provides an objective evaluation of the agricultural business operated by the Applicants and their family in order to justify the requirement for a residential dwelling on the holding, meeting the requirements of Welsh Government national planning policy and those policies of Wrexham County Borough Council concerning residential development in the open countryside with an agricultural functional need.

1.6 This statement 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 Agricultural Appraisal, and these also accompany the planning application submission for the sole viewing of the Local Planning Authority for reasons of commercial sensitivity.

2.0 Background & Site Context

2.1 The business trading name is EW & M Jones, which is a family farming business based at Garreg Llwyd, Froncysyllte. The family have farmed at Garreg Llwyd for several generations; with the business being long-established.

2.2 The land holding at the application site, known as Garreg Llwyd, extends to a total of approximately 100 hectares (247 acres) of owned land. The land comprises mostly grazing land for sheep and cattle, as well as smaller areas for corn and fodder beat growing. The business also farms a further approximately 360 hectares (887 acres) of land which is rented; some of which is on long-term rental agreements (tenancy) and some of which is rented seasonally.

2.3 [redacted]

2.4 The existing farmhouse is occupied by [redacted]

2.5 [redacted] currently resides in rented accommodation at Bryn Coed Farm (LL20 7RY), which is additional land farmed by the farming business, but is not owned. There are agricultural buildings and land at Bryn Coed Farm which require a worker to be present here to respond to any unexpected situations which arise concerning the livestock farming enterprise.

2.6 This application proposes the construction of an additional (second) dwelling on the holding at Garreg Llwyd (owned land) to be occupied by [redacted]

2.7 Labour on the business is predominately provided by [redacted]

2.8 [redacted]

2.9 Garreg Llwyd is located within a remote area of the County Borough, accessed via narrow and steep minor (single track) country lanes which are poorly maintained. This adds to travel times to/from the application site and makes the farm inaccessible for long periods during winter months, when snow and ice can be treacherous. The long travel times and the long periods of hazardous weather conditions on the local roads during winter and spring months make Gareth's travel between his home in St Martins and the farm at Garreg Llwyd increasingly unfeasible. It is on this basis a second dwelling at Garreg Llwyd is proposed.

3.0 The Proposed Development

3.1 The application seeks Outline planning permission (with all matters reserved for future consideration) for the construction of a rural enterprise dwelling on the site, together with a detached garage, formation of a driveway, installation of a private package treatment plant and all associated works.

3.2 The dwelling is proposed on an area of agricultural grazing land to the north of the existing farmhouse, and to the north-east of the main complex of agricultural buildings and yards. The proposed dwelling will be accessed via the farm's existing vehicular access off the public highway, Blaenau Road.

3.3 The dwelling will be surrounded by an area of new private garden, to be enclosed by a new native species hedgerow. Several new native species trees will also be planted within the garden area, to provide both landscape screening and ecological benefits.

3.4 The dwelling will be served by a new private package treatment plant, discharging into a drainage field to the south of the site. The existing farmhouse will also connect to the new system, replacing the existing septic tank and providing an enhanced method of foul drainage.

3.5 The proposed dwelling will have a maximum gross internal floor area of 130 sq. metres, which is considered to be a modestly-scaled property given the context of the site. Upper and lower scale parameters for the dwelling are included on Drawing No: 75223 / 01 REV B, as follows:

Height: 6 – 10.5m
Width: 6 – 16m
Length: 6 – 16m.

3.6 The proposal will be occupied by [redacted], and will provide permanent, suitable, accommodation on the farm to allow the farm to be managed fully, and to allow unexpected situations which arise on the farm to be dealt with outside of 'normal working hours'.

3.7 The proposed siting of the dwelling aims to strike a good balance between meeting the functional needs of the rural enterprise and being within close proximity of the main farm complex at Garreg Llwyd; providing good levels of amenity for its occupants while being sited within close proximity to the livestock buildings on-site.

3.8 As noted, the application is submitted in Outline (with all matters reserved for future consideration) and as such matters concerning the final access, siting, design, scale and external appearance of the proposed development would be subject to future consideration as part of a separate reserved matters application.

3.9 Drawing No: 75223 / 01 REV B, submitted in support of the application, details an indicative proposed site layout for the development.

4.0 Planning Policy Context

4.1 One of the Welsh Government's main objectives for rural areas, as set out in 'Farming, Food & Countryside - Building a Secure Future' (May 2009) is the promotion of a:

"sustainable and profitable future for farming families and businesses through the production and processing of farm and forestry products while safeguarding the environment, animal health and welfare, adapting to climate change and mitigating its impacts, while contributing to the vitality and prosperity of our rural communities. The planning system can play an important part in supporting the future sustainability of agriculture."

4.2 *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".

4.3 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".

4.4 The adopted Wrexham Unitary Development Plan (UDP) (1996-2011) is of primary relevance in terms of local planning policy in this instance. UDP 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".***

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

4.6 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; especially given it has effectively been superseded by the Welsh Government's Technical Advice Note (TAN) 6 in this case.

4.7 TAN 6 (2010) is broadly supportive of a strong rural and agricultural economy. It states:

"The Welsh Assembly Government's objective is a sustainable and profitable future for farming families and businesses through the

production and processing of farm products while safeguarding the environment, animal health and welfare, adapting to climate change and mitigating its impacts, while contributing to the vitality and prosperity of our rural communities. The planning system can play an important part in supporting the future sustainability of agriculture".

4.8 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."***

4.9 In terms of second dwellings on established farms, TAN 6 contains specific provisions:

"4.5.1 The Assembly Government wishes to encourage younger people to manage farm businesses and promote the diversification of established farms. To support this policy objective it may be appropriate to allow a second dwelling on established farms that are financially sustainable where the criteria set out in paragraph 4.4.1 cannot be fully satisfied. The two exceptions to the policy are:

- ***Where there are secure and legally binding arrangements in place to demonstrate that management of the farm business has been transferred to a person younger than the person currently responsible for management, or, that transfer of management is only conditional upon grant of planning permission for the dwelling. The younger person should demonstrate majority control over the farm business and be the decision maker for the farm business; or***

- ***There is an existing functional need for an additional 0.5 or more of a full time worker and that person obtains at least 50% of a Grade 2***

Standard Worker salary, (as defined by the latest version of the Agricultural Wages Order), from the farm business".

4.10 Also of note is the Welsh Government's TAN 6 Practice Guidance concerning Rural Enterprise Dwellings (2011).

5.0 Appraisal of Need

Functional Need

5.1 The primary test set out in TAN 6 is an assessment as to whether it is essential for a rural worker to live at, or near, their place of work. In this case, there are well-established livestock (sheep and cattle) breeding and rearing enterprises at Garreg Llwyd, from which the functional need for an additional dwelling is derived.

5.2 Agricultural legislation requires that all farm 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.

5.3 As noted within Paragraph 2.2 of this appraisal, the holding at Garreg Llwyd is extensive, comprising 100 hectares of owned land; mostly comprising grazing land but also including smaller parcels of land for growing corn and fodder beat. As noted, there are also significant areas of rented land which is farmed by the established enterprise based at Garreg Llwyd. Much of this land, for example the holding at Bryn Coed Farm, has been farmed by the business for several decades.

5.4 The farm's main enterprise is its sheep rearing enterprise; comprising approximately [redacted] These lambs are reared in the spring and summer months; with the majority being sold as fat lambs either in local livestock markets or being sent directly to an abattoir for slaughter. A percentage of ewe lambs are retained each year for breeding purposes. In addition, approximately [redacted] are bought annually for fattening from local markets. As noted, the farm also has a herd of approximately [redacted]. Approximately [redacted] are also purchased per year for fattening and are sold at local markets.

5.5 [redacted]

5.6 In addition to the constant care, feeding and supervision of the sheep and cattle on the farm, the business maintains and manages the farmland at Garreg Llwyd (and rented land) to ensure it is kept in optimal condition for grazing and cropping.

5.7 In total, the farm silages approximately [redacted] of land (across multiple cuts), produces [redacted] for use by the livestock on-site per year. The farm utilises all of the crops produced for its own livestock, and aims to be as self-sufficient in terms of feed/crop production as possible to both limit costs and produce meat which is as sustainable as possible.

5.8 In order to provide appropriate supervision for the livestock enterprise, the Applicants consider it essential that an additional rural worker, being Gareth Jones in this case, lives on-site at Garreg Llwyd in order to meet the necessary management and supervision of the housed livestock and to ensure that animal welfare needs are not compromised.

5.9 There is a legal responsibility under the Animal Welfare Act 2006 to ensure that all animals are kept 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; and freedom to display most normal patterns of behaviour. The issue of security is also acknowledged to be an increasing problem and such risks can only be adequately managed with the provision of on-site supervision.

5.10 Under the Animal Welfare Act 2006, it is an offence to cause unnecessary suffering to any animal. The Act also contains a duty of care to animals which means that anyone responsible for an animal must take reasonable steps to make sure the animal's needs and its welfare are met. The overall responsibility for duty of care for animal welfare currently lies with the Applicants.

5.11 An assessment of the essential need for a rural worker to live at or near their place of work requires:

- an evaluation of the risks involved;
- the frequency and type of out-of-hours emergency that might arise;
- the scale and loss that could be incurred should that emergency situation occur;
- the potential for an on-site worker to identify the problem; and
- the ability of that resident worker to rectify the problem.

5.12 As noted, the Applicant's livestock enterprise at Garreg Llwyd comprises the following at present:

- [redacted]

- [redacted]

5.13 In the case of the livestock enterprise at Garreg Llwyd, the main essential functional needs for a worker to be present and available at all times arise from:

- the general welfare and care of all livestock on the farm;
- the general welfare and management of all breeding stock where assistance may be required at calving and lambing;
- the general care and attention of newborn lambs and calves, ensuring they have received adequate colostrum; assistance may be required to encourage suckling;
- the reproductive requirements of the breeding stock, such as monitoring heat detection (oestrus) and its synchronisation;
- the regular inspection of livestock whether housed or at grass for signs of disease or distress and to rectify the problem promptly;
- provision of security for animals from theft or malicious attack; and
- dealing with any unforeseen emergencies or situations which may arise outside of 'normal working hours' including escaped or injured livestock.

5.14 It is considered that [redacted] has been meeting the additional full-time labour requirements of the enterprise by travelling to / from the application site at Garreg Llwyd from his home [redacted]. It is considered the proposed agricultural worker's dwelling will provide a more appropriate form of permanent accommodation for [redacted], which will help to safeguard the future viability of the overall business by allowing an additional worker to be on-hand on the site at all times of the day and night – meeting the essential needs of the enterprise and welfare requirements of the livestock on the farm. Indeed, it is considered the current situation [redacted]) is unsustainable, [redacted]

5.15 The proposed dwelling will provide a permanent home for [redacted] to reside in within close proximity to the existing farm complex and within sight and sound of the livestock housed within the buildings at Garreg Llwyd – helping to ensure the welfare of the livestock is safeguarded and the financial viability of the business is protected.

5.16 As such, a clear functional need for an additional dwelling on the holding exists, and the requirements of the 'functional test' as outlined within TAN 6 have been met.

Labour Requirements

5.17 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".*

5.18 As noted, the proposed will be the second dwelling on the holding at Garreg Llwyd, and the current dwelling house on-site is occupied by [redacted]

5.19 The labour requirement for the farming enterprise, obtained from standard data in the *John Nix Management Pocketbook* 56th Edition (2026), is provided below in Figure 1:



Figure 2: Labour Assessment for the farming enterprise

5.20 It can be seen that the livestock farming enterprise at Garreg Llwyd requires approximately 12.76 full-time farm workers to meet its functional needs.

5.21 Given that 12.76 full-time workers are required on the enterprise, the requirements of TAN 6 have been met with regards the time test, as this is in excess of the 1.5 workers required to justify a second dwelling on an established farm.

Financial Soundness

5.22 For permanent dwellings, Paragraph 4.10.1 of TAN 6 notes that *"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, usually at least five years"*.

5.23 The financial test is set out at Paragraph 4.10.2 of TAN 6 and states:

"To assess economic sustainability it will be necessary to show the business has a reasonable prospect of providing a market return for all operators for the amount of management and manual labour inputs, including the job for which the rural enterprise dwelling is being sought, for at least five years from the anticipated completion of the proposed development".

5.24 It is clear from the scale of the business operating from Garreg Llwyd that it is a legitimate and long-established agricultural enterprise which has operated for several generations. As noted, within the last 18 months or so the business has tried to expand, by taking on additional agricultural land and retaining higher stock numbers.

5.25 The enterprise's business accounts from the years 2021 - 2025 have been submitted as part of the outline planning application, showing net profits as follows:

[redacted]

5.26 Accounts for the year ending April 2026 are not available at the time of writing as they are still being finalised by the business' Accountant.

5.27 The submitted financial accounts details are to be kept strictly confidential and are for the sole viewing and consideration of the Local Planning Authority for reasons of commercial sensitivity.

5.28 [redacted]

5.29 [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

5.35 [redacted]

[redacted]

[redacted]

[redacted]

5.38 [redacted]

5.39 Paragraph 5.19 of the TAN 6 Practice Guidance for Rural Enterprise Dwellings states as follows:

"The financial test for new dwellings requires that, having provided evidence of positive financial performance, rural enterprises must show that they have a reasonable prospect of sustaining returns to the labour employed for at least the following five years. Future projections are notoriously hard to formulate. A realistic approach to the test would be to identify the sensitivity of a business to changes in factors such as market conditions, legislative constraints and financing, and consider whether any changes of a magnitude which would threaten the enterprise are foreseeable".

5.40 [redacted]

5.41 Overall, it is considered the Applicant's farm business is viable and sustainable now, and is likely to remain so in the long-term. It is well established and like all farming enterprises is subject to price fluctuations which are out of the control of the business. [redacted]

The Suitability & Availability of Alternative Accommodation

5.42 As noted, there is a single existing farmhouse on-site at Garreg Llwyd at present, which is within the ownership of the Applicants. Furthermore, there are no redundant buildings which are capable of being converted to provide a dwelling house on the farm; with all existing buildings already being in agricultural use and being of modern construction which makes them unsuitable for residential conversion in any case.

5.43 Furthermore, a search of Rightmove on 25/06/2026 found that there were no dwellings for sale within a 0.5 mile radius of the application site. Similarly, there were no properties for rent within this search radius. Thus, no existing dwellings within the locality are available to meet the needs of the subject rural enterprise.

5.44 Given the rurality of the application site and the nature/quality of the surrounding public highway network, it is considered a 0.5 mile search radius

is appropriate in this case. A dwelling any further away than this from the application site would not allow Gareth to travel to the site in a timely manner to address any emergency situation on the farm. Further, it would not allow him to be within sight and sound of the farm complex to be alerted to any emergency situation in the first place.

5.45 The option of Gareth and his family residing within the existing dwelling house with his parents is also not a feasible option in this case. An Inspector concluded the same in a similar planning appeal elsewhere within the County Borough recently (reference: CAS-04598-K2Z4V4) at Talfryn Cottage, Erbistock.

5.46 Similarly, whilst the option of extended and remodelling the existing dwelling has been considered, in this case based on the likely costs of such an extension together with the required internal alterations of the existing dwelling to facilitate it, it has been discounted. Indeed, given the scale and design of the existing dwelling, any extension would likely be substantial and it is unclear whether any such planning permission would be forthcoming from the Local Planning Authority.

5.47 It is therefore clear that there are no alternative dwellings or buildings suitable for conversion within sufficient proximity to the Applicant's farm to meet the functional needs of the agricultural enterprise in this case.

5.48 Thus, the proposed construction of the second dwelling at Garreg Llwyd is the only feasible option available to meet the ongoing and future needs of the subject rural enterprise.

6.0 Conclusion

6.1 This application requests outline planning permission for the construction of a rural enterprise dwelling on the farm at Garreg Llwyd, Froncysyllte. The proposed dwelling will be occupied by Gareth Jones; the Applicants' son, and as such the agricultural worker's dwelling will be occupied by a full-time worker employed in the Applicants' agricultural business.

6.2 The dwelling will meet the established essential needs of the enterprise and ensure that the management and welfare of all the animals kept on the farm is not compromised.

6.3 The confidential farm business accounts provided demonstrate that the Applicant's business is viable and sustainable now, and is likely to remain so in the long-term.

6.4 There are no other suitable and available dwellings in the locality that can meet the essential needs of the Applicants' farming business. Further, there are no redundant buildings on the farm which could be converted.

6.5 Overall, it is concluded that the Applicant's proposal is compliant with the requirements of TAN 6 in that the 'functional', 'time', 'financial' and 'other dwelling' tests have all been met.

6.6 It is therefore respectfully requested that outline planning permission be granted for the development by the Local Planning Authority.