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Wrexham County Borough Council,
Planning Department,
Lambpit Street,
Wrexham,
LL11 1AR

Dear Sir or Madam,

Reference: FULL PLANNING APPLICATION FOR THE CHANGE OF USE FROM DWELLING HOUSE (CLASS C3) TO INDEPENDENT SCHOOL (CLASS D1) AT CUMBERS HOUSE, GREDINGTON, HANMER, WHITCHURCH, SY13 3DH

This letter has been prepared by Stantec UK Limited on behalf of our Client, The Greenhouse Learning and Development Ltd (the 'Applicant') in support of a full planning application for the change of use from a dwellinghouse (Use Class C3) to an independent school (Use Class D1) at the above address (the 'Site').

Background

The Applicant, The Greenhouse Learning and Development Ltd, is an established education and training provider that delivers education, outreach services, accredited qualifications and online learning resources for children, young people and adults. Through its existing education provision, the organisation works with children and young people requiring additional educational support, providing personalised learning pathways that enable individuals to engage positively with education and achieve their potential.

This application seeks full planning permission for the change of use of Cumbers House, a large detached residential property (Class C3), to an independent school (Class D1), including any means of access to the site where/if deemed necessary.

The Proposed Development represents a natural progression of Our Greenhouse's existing educational services, enabling the organisation to establish a small independent school providing high-quality education for up to 20 pupils aged between 11 and 19 years. The school will primarily support children who require a structured, nurturing and low-stimulation learning environment, including those who have struggled to thrive within larger mainstream educational settings.

In response to the growing national demand for specialist educational provision, the school will provide a personalised learning environment through small class sizes, structured routines, tailored pastoral support and outdoor learning opportunities, helping to meet the needs of pupils who require a more supportive educational setting than can typically be provided within mainstream education.

In support of this full application, the following documents and plans have been submitted alongside this letter:

- Application form and fee
- Site Location Plan (ref. 26.617.001)
- Existing Site Plan (ref. 26.617.002)
- Proposed Site Plan (ref. 26.617.003)
- Existing Floor Plan (ref. 26.617.100)
- Proposed Floor Plan (ref. 26.617.200)
- This Covering Letter, setting out the planning justification.
- Community Benefits Statement
- Educational Need Justification Statement
- Noise Management Plan
- Operational Management Plan
- Design and Access Statement
- Transport Statement.

Site and Surroundings

Cumbers House is a large detached residential property located off the A539 in the rural settlement of Gredington, approximately 1km west of the rural village of Hanmer. The Site is within the administrative boundaries of Wrexham County Council.

The dwelling is surrounded by generous landscaped grounds and is bound on all sides by mature trees and vegetation.

The property benefits from an established vehicular access leading to a large driveway and parking area capable of accommodating approximately ten vehicles. Existing turning space allows vehicles to enter and leave the site in a forward gear.

As seen within the majority of the rural area surrounding Wrexham, the Site lies within a designated Special Landscape Area (SLA) under Policy EC5 of the adopted Unitary Development Plan (UDP).

The Site is wholly situated within Flood Zone 1, is not at risk of surface water flooding. There are no statutory environmental, ecological or heritage designations relevant to the Site.

The Site is accessed directly from the A539, a principal route connecting Llangollen and Eglwys Cross via Ruabon. Local planning policy identifies this as being part of the Core Highway Network under Policy T6.

A bus stop is located approximately 70 metres from the Site entrance, providing regular Bus 146 services between Wrexham and Whitchurch. Whitchurch Railway Station lies approximately 14km to the east of the Site and can be reached in around 15 minutes by private vehicle or approximately 37 minutes by bus, providing onward rail connections to the wider region.

The surrounding area is predominantly rural in character, comprising agricultural land and associated farm buildings, sporadic residential properties, Hanmer Doctors Surgery, and a limited number of commercial uses.

From a review of the Council's public access records, there is no planning history associated with the Site.

The Proposal

Planning permission is sought for the change of use of the existing dwelling (Use Class C3) to independent school (Class D1).

The proposal includes internal, non-structural alterations to provide classrooms, office space, welfare facilities and staff accommodation, whilst retaining the existing vehicular access, driveway and parking arrangements. The existing private grounds will continue to be used for supervised outdoor learning and recreational activities. No extensions or additional buildings are proposed at this time.

Cumbers House has been selected because its physical characteristics, setting and existing built form are well suited to the proposed specialist educational use. Cumbers House provides the scale, flexibility and outdoor space required for small-group teaching, pastoral support and supervised outdoor learning, while its rural and landscaped setting offers a calm, low-stimulation environment for pupils who may not thrive in larger or more urban school settings. The proposal would also secure the beneficial re-use of a building that has been vacant for a sustained period.

The proposed school will accommodate a maximum of 20 pupils, supported by up to eight members of staff. Teaching activities will take place between 9:00am and 3:30pm, with staff typically present between 8:00am and 5:00pm on weekdays only. There will be no boarding accommodation, evening classes or routine weekend operations.

The submitted Proposed Site Layout Plan shows how the Site will support approximately 10 parking spaces within the existing hardstanding. This will be utilised for staff parking, visitor parking and short-term parent or carer drop-off where required.

The proposal has been deliberately designed to remain modest in scale, making effective use of the existing building and its extensive grounds. Consequently, the development will result in only limited operational change while providing a high-quality educational environment within an established property.

Overall, the proposal represents a sensitive and well-considered form of development which responds positively to its surroundings whilst delivering significant public benefits.

Further detail is contained within the submitted plans, drawings and Design and Access Statement.

Planning Policy

Local Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The adopted Development Plan for the Site comprises the Wrexham Unitary Development Plan (UDP) 1996–2011, adopted in February 2005. Whilst the UDP predates the current planning system in Wales, a number of its policies remain relevant to the determination of this application.

The application relates to the change of use of an existing dwellinghouse and therefore represents the continued beneficial use of an established building, rather than the development of undeveloped

countryside. The supporting text to the UDP recognises the benefits of re-using existing buildings, noting that the conversion of existing buildings makes efficient use of existing resources whilst supporting wider conservation objectives.

Policy EC5 (Special Landscaped Areas) outlines that within Special Landscaped Areas, priority will be given to the conservation and enhancement of the landscape. The purpose of this designation is to ensure that priority is given to the conservation and enhancement of the landscape character of these locally important areas. The majority of Wrexham's rural countryside is covered by this designation in recognition of its landscape quality.

Policy GDP1 (Development Objectives) sets out that new development should, among other things;

- provide safe and convenient pedestrian and vehicular access (Criterion d);
- be located where there is convenient access to public transport and opportunities for sustainable travel (Criterion e); and
- contribute towards the economic, social and environmental well-being of communities through sustainable development (Criterion k).

Under Policy T6, the A539 is identified as being part of the Core Highway Network.

Material Considerations

A summary of the material considerations that are relevant to the determination of this application are set out below.

Planning Policy Wales: Edition 12 (PPW)

Planning Policy Wales Edition 12 (PPW12) was issued on February 2024 and incorporates the objectives of the Well-being of Future Generations (Wales) Act 2015 into town and country planning and sets out Welsh Government’s policy on planning issues relevant to the determination of all planning applications.

PPW12 places strong emphasis on the role of education facilities in creating sustainable, well-designed communities. It explicitly supports the provision of new schools as part of its wider commitment to placemaking and the promotion of the Welsh language.

It emphasises that planning authorities should facilitate the delivery of community facilities, including educational establishments, to ensure that the needs of existing and future communities are met.

Chapter 2 (People and Places: Achieving Well-being Through Placemaking), particularly paragraphs 2.9–2.12, which establish sustainable placemaking as the primary objective of the planning system and require developments to contribute towards the creation of sustainable places.

Paragraphs 2.15–2.18, goes on to set out the National Sustainable Placemaking Outcomes, which include promoting healthier places, improving accessibility, and fostering inclusive communities. Schools are seen not only as educational facilities but as multi-functional hubs that can support wider community use, encourage active travel, and reduce reliance on private cars.

Chapter 3 (Strategic and Spatial Choices), particularly paragraphs 3.33–3.37, which supports the efficient use and re-use of land and existing buildings in appropriate locations, recognising that the re-

use of existing buildings can contribute to sustainable patterns of development and the prudent use of resources.

Chapter 4 (Active and Social Places) contains paragraphs 4.2-4.4, which recognises the importance of community facilities in creating sustainable places, and paragraphs 4.1.15-4.1.18, which support the provision of education facilities as essential social infrastructure that contributes to healthier, more inclusive communities.

Chapter 6 (Distinctive and Natural Places) particularly paragraphs 6.3.5-6.3.11, which seek to protect and enhance landscape character whilst ensuring development responds positively to its surroundings.

Technical Advice Note 6: Planning for Sustainable Rural Communities

Technical Advice Note 6 (TAN6) provides practical guidance on the role of the planning system in supporting the delivery of sustainable rural communities. It supplements Planning Policy Wales by promoting development that strengthens rural economies, services and communities whilst protecting the countryside.

A key consideration for planning authorities is whether a proposal enhances or diminishes the sustainability of the rural community in which it is located. TAN 6 advocates a positive approach towards proposals that support the viability and accessibility of existing rural services and facilities, encourage rural employment opportunities, and make effective use of existing buildings and infrastructure where appropriate.

Technical Advice Note 11: Noise

Technical Advice Note 11 (TAN11) provides guidance on how the planning system should minimise the adverse impacts of noise without placing unreasonable restrictions on development.

It advises that local planning authorities should consider both noise-generating development and noise-sensitive uses, ensuring that new development is appropriately located and designed to protect amenity. Where necessary, suitable mitigation measures should be incorporated to prevent unacceptable noise impacts on existing or future occupants.

Technical Advice Note 23: Economic Development

Technical Advice Note 23 (TAN23) sets out guidance on the role of the planning system in supporting sustainable economic development across Wales.

It adopts a 'whole economy' approach, recognising that economic development extends beyond traditional employment uses to include public services, education, tourism, agriculture and other activities that generate or sustain jobs, wealth and income.

TAN 23 advises that the economic benefits of development proposals should be given appropriate weight in the planning balance alongside social and environmental considerations.

In addition to the strong policy support for educational development, there is a clear and evidenced need for additional specialist educational provision within Wrexham and the surrounding area. The proposal responds to increasing demand for specialist school places for children and young people whose needs cannot always be appropriately met within mainstream educational settings. By providing education for up to 20 pupils aged between 11 and 19 years in a dedicated specialist environment, the

development will expand local educational capacity and increase choice for local authorities and families.

Planning Assessment

This sub-section details the main planning considerations of relevance to the Proposed Development and assesses the scheme proposals against relevant Development Plan policies and material considerations.

Principle of Development

The application seeks planning permission for the change of use of an existing dwellinghouse (Use Class C3) to an independent school (Use Class D1). The proposal will provide specialist education for up to 20 pupils aged between 11 and 19 years within an existing residential property, requiring only minor internal alterations. The re-use of an existing building for an educational purpose represents a sustainable form of development, making efficient use of existing infrastructure whilst avoiding the need for new construction.

The principle of providing educational facilities is strongly supported by PPW12, which recognises schools as essential social infrastructure that contributes to healthier, more inclusive and sustainable communities. PPW12 also promotes the efficient re-use of existing buildings in appropriate locations. Similarly, TAN6 supports development that strengthens the sustainability of rural communities through the provision of local services and facilities, whilst TAN23 recognises education as an important component of the Welsh economy and advises that the economic and social benefits of such development should be afforded significant weight in the planning balance.

As with the majority of the rural area surrounding Wrexham, the Site lies within a designated Special Landscape Area under Policy EC5 of the Wrexham UDP. However, the proposal is limited to a change of use and minor internal alterations only. No extensions or additional buildings are proposed, and the existing mature landscaping surrounding the Site will be retained. Consequently, the proposal will preserve the character and appearance of the Special Landscape Area and is fully consistent with the objectives of Policy EC5.

The submitted Educational Need Justification Statement demonstrates that there is an identified and growing demand for specialist educational provision within Wrexham and the surrounding area. Increasing numbers of children require smaller, more supportive learning environments that cannot always be provided within mainstream education. The proposed school will help meet this need by providing a personalised educational setting through small class sizes, structured routines, pastoral support and outdoor learning opportunities.

The proposal will deliver a number of public benefits, including:

- additional specialist school places to meet an identified need;
- increased educational choice for local authorities and families;
- improved opportunities for children requiring additional educational support;
- skilled local employment opportunities;
- continued beneficial use of an existing building; and
- investment in the local economy through the ongoing operation of the school.

Having regard to the above, the principle of the proposed development is considered acceptable. The proposal represents a sustainable form of development that delivers clear educational, social and economic benefits, whilst preserving the character of the surrounding landscape. It therefore accords with Policies GDP1 and EC5 of the Wrexham UDP, together with the objectives of PPW12 and the guidance set out in TAN 6 and TAN 23.

Highway and Transport

The submitted Transport Statement concludes that the proposal will generate only modest levels of traffic.

Unlike larger mainstream schools, pupils are expected to arrive individually with parents, carers or local authority transport providers rather than by coach.

The existing access benefits from suitable visibility and connects directly to lightly trafficked rural roads. Approximately ten on-site parking spaces are available together with sufficient turning space to enable vehicles to leave in a forward gear.

Given the limited pupil numbers and staffing levels, the anticipated traffic generation is not considered significant and will largely be concentrated during relatively short morning and afternoon periods.

The Site benefits from an established access onto the A539, identified under Policy T6 as part of the Core Highway Network. Existing visibility, parking provision and turning space are sufficient to accommodate the modest scale of the proposed development.

The submitted Transport Statement confirms that the proposal will not result in an unacceptable impact upon highway safety or the operation of the surrounding highway network and, therefore, accords with Policies GDP1 and T6 of the Wrexham UDP.

Landscape and Residential Amenity

The proposal has been deliberately designed to minimise its impact on the surrounding area. No external extensions or additional buildings are proposed, with all teaching and associated facilities accommodated within the existing dwelling.

The existing mature landscaping and spacious grounds will be retained, ensuring the rural character of the Site and the wider Special Landscape Area remains unchanged.

Operationally, the school will remain modest in scale, accommodating a maximum of 20 pupils during normal weekday school hours. There will be no boarding accommodation, evening classes or routine weekend operation. Outdoor activities will take place within the existing private grounds under appropriate supervision.

The accompanying Operational Management Plan and Noise Management Plan demonstrate that the proposed use can operate without giving rise to unacceptable impacts upon neighbouring occupiers or the character of the surrounding area.

Accordingly, the proposal will not give rise to unacceptable impacts on neighbouring amenity or the character of the surrounding area and accords with Policies GDP1 and EC5 of the Wrexham UDP and Chapter 6 of PPW12, and TAN11.

Planning Assessment and Conclusion

Reference: Cumbers House, Whitchurch

The proposal represents the sustainable re-use of an existing dwelling to provide a specialist educational facility addressing an identified need.

The supporting technical documents demonstrate that the proposal can be accommodated without unacceptable impacts upon highway safety, residential amenity or the character of the surrounding area.

Conversely, the proposal will deliver a range of social and economic benefits through the provision of much needed additional specialist educational places, increased educational choice, skilled employment opportunities and the continued productive use of an existing building.

The proposal therefore accords with relevant Policies of the Wrexham UDP, together with the objectives of PPW12. Having regard to the Development Plan as a whole and all other material considerations, planning permission should therefore be granted.

Furthermore, the proposal will deliver significant public benefits through the provision of additional educational capacity, skilled employment and enhanced educational opportunities for vulnerable children.

Having regard to the Development Plan as a whole and all other material considerations, the proposal represents sustainable development and should therefore be approved without delay.

We trust that the enclosed submission provides all of the information necessary to enable the application to be validated without delay. Should the Local Planning Authority require any further information to consider the application, we would be pleased to provide this.

Regards,

