

Response to Planning Policy Comments

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)

[redacted]

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1.0 Introduction

1.1 This statement seeks to address the comments provided by the Local Planning Authority's Planning Policy Team in relation to outline planning application reference P/2026/0413; which relates to the construction of a new rural enterprise dwelling with all associated works on land at Garreg Llwyd, Froncysyllte.

1.2 The proposed dwelling will be the second on the farm at Garreg Llwyd (there is already an existing farmhouse) and will provide suitable on-site accommodation for a rural worker associated with a long-established agricultural enterprise.

1.3 This statement is to be read alongside the already-submitted Rural Enterprise Appraisal (dated June 2026) which forms part of the outline planning application.

1.4 As noted, this statement aims to respond to and address the comments provided by the LPA's Planning Policy Team in relation to the pending outline planning application. The comments from the Policy Team seek additional information in relation to the 'functional' and 'financial' tests as outlined within the Welsh Government's Technical Advice Note (TAN) 6 on *Planning for Sustainable Rural Communities*.

2.0 Applicant's Response

Functional Test

2.1 The Planning Policy Team's comments state that it has not been confirmed to-date the frequency of issues needing urgent assistance from a worker on the farm. The comments note that the frequency of such instances will be 'fluid' and will vary from year to year; however estimates have been requested.

2.2 Paragraphs 5.1 – 5.16 of the submitted Rural Enterprise Appraisal detail information concerning the Functional Test and the functional needs of the existing enterprise for an additional dwelling house on the farm at Garreg Llwyd.

2.3 Of specific relevance is the frequency of issues which occur outside of 'normal working hours' and which require an immediate response from a readily available on-site farm worker. Such issues at Garreg Llwyd include ewes lambing, cows calving, livestock escaping their buildings or their fields, livestock getting injured and livestock getting trapped/stuck in fences or hedges, as well as livestock suffering from illness or disease – which requires an immediate response for both reasons of animal welfare as financial viability. This list is not exhaustive but does provide an insight into the type of

emergency situations which regularly occur on the farm; owing to the fact that it is an extensive upland livestock farm with considerable stock numbers.

2.4 Concerning the existing farming enterprise at Garreg Llwyd, the essential functional need arises 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 birthing;
- 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 unforeseen emergencies – including those as detailed within Paragraph 2.3 of this statement, above.

2.5 As requested by the Policy Team, the following gives an indication, based on recent years, of the frequency of issues on the farm which require an immediate response from a readily available farm worker:

- Issues during lambing and calving: Given that the farm has 2000 breeding ewes and 35 suckler cows, such issues are commonplace. Generally speaking the Applicant confirms that approximately 25% of lambings require intervention from a farm worker at Garreg Llwyd – equating to approximately 500 ewes needing immediate assistance to give birth per annum. The farm lambs its ewes generally between the months of January and April each year, and as such the need for an on-site presence during lambing time is spread over several months per year.

  With regards issues during calving, as noted the farm has approximately 35 suckler cows currently, as well as followers. The farm operates a year-round calving system, and therefore the approximate 35 calvings are spread across the year. The farms three stock bulls are run with the cows for lengthy periods (no use of artificial insemination is used) and as such the Applicants do not have accurate predicted calving dates which they are able to rely on. Therefore, issues involving calving can occur out-of-the-blue and without warning. Emergency assistance is generally needed during 20 calvings per year, due to the potential for complications during birth and the occasional need for vet assistance, especially where emergency caesareans are needed to be performed. Of course, a cow can go into labour during any time of the day or night, and therefore, the availability of a farm worker at all times is necessary for both animal

welfare reasons as well as for reasons of the overall viability of the business.

- Livestock escaping from their buildings or fields. The Applicant has confirmed that such issues happen approximately 2-3 times per month, and can happen at any time of the day or night, without warning.

- Livestock injuring themselves. The Applicant confirms that such issues occur regularly and require an appropriate immediate response from an available worker regardless of time or day. Such issues occur weekly generally.

- Livestock getting trapped/stuck in fences or hedges. Such issues occur several times per month; especially in the summer months when most the farm's stock are kept outdoors in fields. In winter months, when most stock are housed, issues can involve cattle getting stuck in feed barriers and feeders – requiring an immediate response from a worker to ensure their health and general wellbeing is not compromised.

- Livestock suffering from illness/disease. Such issues are impossible to predict and always need to be responded to immediately to safeguard the health and wellbeing of the animal involved. Such issues can occur multiple times per week. During the summer months, issues with sheep getting maggots are common (multiple times per day – weather dependent) and need to be treated promptly to prevent the death of the ewe/lamb involved. This involves a worker needing to periodically manually check all sheep in fields for signs of parasitic infection. This is just one example of such an illness/disease but given the extent of livestock present on the farm, such issues are commonplace.

2.6 This information, together with the information already included within the submitted Rural Enterprise Appraisal, confirms that the enterprise clearly has a functional need for an additional dwelling house, in-line with the provisions and guidance outlined within TAN 6 and the associated TAN 6 Practice Guidance for Rural Enterprise Dwellings.

Financial Test

2.7 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"*.

2.8 The financial test is set out at Paragraph 4.10.2 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".

2.9 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".

2.10 It is confirmed that the business operated from Garreg Llwyd is a long-established farming business which has been in the [redacted] It [redacted].

[redacted]

2.13 While the submitted Rural Enterprise Appraisal (Figure 2) details that the enterprise has a need for 12.76 full time-workers, it is confirmed that all labour on the farm is provided [redacted]

2.14 Both [redacted] and [redacted] share all responsibilities on the farm – with no formal division of roles or jobs. As such, it is not possible to confirm what hours each worker spends on each role in a given day. However, in a general day on the farm (with no specific 'large job' such as shearing, dipping or harvesting taking place) roles include the following:

- Checking all livestock (both housed and in fields) multiple times per day

- Feeding stock twice per day (more in winter months)
- Cleaning out housed stock
- Bedding up housed stock
- Muck spreading
- Harrowing
- Fertiliser spreading
- General farm maintenance / repairs of machinery, sheds, fences etc
- General cleaning of the farm yard, livestock areas, holding areas etc
- Spraying of weeds
- Sorting/draughting stock
- Checking fat lambs / calves for their weight and overall condition in preparation to sell
- Sorting old ewes / cows ready for culling
- Hoof trimming
- De-horning of calves
- Castration of male lambs and calves
- Tagging of all stock in accordance with government requirements
- Treating of stock with fly repellent and other parasite prevention measures
- Drenching of stock with wormer and fluke treatment
- Tail docking of sheep to help prevent manure build-up
- Electric fence maintenance
- Weaning of youngstock
- Routine stock health checks
- Farm admin
- Completion of livestock movement licences online
- Registration of new livestock births online
- Mandatory online training for the Sustainable Farming Scheme (SFS)
- Taking livestock to market and/or abattoir.

2.15 The above list of general jobs on the farm is not exhaustive and does not cover larger, specific jobs such as shearing, TB testing, dipping or harvesting. As noted, both [redacted] generally share all roles/jobs on the farm – they do not designate specific roles or jobs – this working arrangement is commonplace on a family farm and is typical of such family farms right across Wales. A key factor why both brothers enjoy life on the farm is the variety of work which is involved, and the fact that no two days are the same.

2.16 Thus, a specific list of jobs for each of [redacted] cannot be presented on this occasion, and it is not considered reasonable of the LPA to have asked for such information considering it does not exist. Importantly, TAN 6 does not state that such information is required.

5.1 It is confirmed that [redacted] work far in excess of the hours comprised in a 'normal working day' for most non-farm workers. Again, this is a family farming business and is commonplace on comparable farms right across Wales and the wider UK. [redacted]

[redacted] This is very much the nature of the business – being a family run enterprise with a large number of animals to care for and a large extent of farmland to actively manage. 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.

2.17 It is further confirmed that in reality, no sub-contractors are used on the farm. Almost all labour is provided by [redacted] themselves, with the occasional help of casual labour on days it is needed (for example during shearing time). [redacted]

2.18 The Applicants acknowledge the Policy Team's request for clarification that the agricultural workers engaged within the enterprise receive, or that the enterprise is capable of providing, an appropriate level of remuneration for the work they both undertake.

2.19 [redacted]

2.20 The particular labour structure here is characteristic of a family-operated upland Welsh livestock enterprise, within which the principal working members undertake extensive livestock husbandry, management and emergency duties throughout the year – as detailed within the submitted Rural Enterprise Appraisal and above within this statement. Importantly, the Welsh Government's TAN 6 Practice Guidance for Rural Enterprise Dwellings itself recognises that persons operating rural enterprises commonly work long and anti-social hours and that their labour is frequently undervalued. The guidance consequently provides a standardised methodology for assessing labour requirements and requires an appropriate return to labour to be accounted for within the financial appraisal.

2.21 The Applicants do not therefore rely upon historically modest drawings as evidence of appropriate remuneration. Instead, the financial appraisal attributes an appropriate commercial value to the labour objectively required to operate the enterprise.

2.22 [redacted]

[redacted]

2.23 [redacted]

2.24 [redacted]

2.25 Additionally, the accounts demonstrate a marked increase in the remuneration of [redacted] the next generation – as his contribution to the running of the farm has increased in-line [redacted] This reflects the evolving labour and management structure of the farm business and its continuation into the next generation. Further, as detailed within the submitted Rural Enterprise Appraisal, the financial performance of the farm is only expected to increase once [redacted] is able to reside on the farm and commit more time to working on it – being present 24/7 on the farm to fully respond to any emergency situations which occur.

2.26 The proposal should therefore be considered in the context of a substantial established agricultural enterprise which has demonstrated sustained commercial activity, profitability over the majority of the assessment period, considerable financial resilience and an ongoing requirement for agricultural labour.

2.27 [redacted]

2.28 As noted, 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".

2.29 Given the above, the contents of the submitted Rural Enterprise Appraisal and the submitted business financial accounts for the Applicants' business – it is clear that the business is long-established and has always remained financially viable – it has supported the Jones family for generations as the family has grown. The submitted financial details do not contain any information which would suggest that this is going to negatively change in the coming years (specifically within the next five years as referenced within TAN 6).

2.30 [redacted]

2.31 [redacted]

2.32 Overall therefore, it is considered that the Applicants' farm business is viable and sustainable now and is likely to remain so in the long-term. It is well established and like all financial enterprises is subject to price fluctuations which are outside the control of the business.

2.33 Accordingly, a reasoned judgement can be made that the proposal accords with the requirements of the Financial Test as detailed within TAN 6.

3.0 Conclusion

3.1 This information addresses the comments made by the LPA's Planning Policy Team concerning the 'functional' and 'financial' tests (as per TAN 6) in relation

to outline planning application P/2026/0413 for the construction of a rural enterprise dwelling at Garreg Llwyd, Froncysyllte.

3.2 It is considered that the rural enterprise at Garreg Llwyd meets the requirements of TAN 6 to allow the construction of a second dwelling on the farm, to meet the essential functional needs of the farming business.