



T O M P K I N S T H O M A S

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Our ref: JR 19032 Wem

*By email only*

8<sup>th</sup> January 2021

Dear Sir/Madam,

### SLP Review: Regulation 19 Pre-Submission Plan Consultation

This letter is written on behalf of JR Planning & Development who are promoting the inclusion of **WEM033** as a site allocation for housing in the Shropshire Local Plan Review.

#### General comments

JR Planning & Development are pleased that the Shropshire Council have been proactive in reviewing the Local Plan and that the draft Plan positively identifies opportunities for regeneration and the delivery of new homes to help secure a sustainable future for the county and the people who choose to live, work and visit. This notwithstanding, the UK's housing land supply crisis is renowned, and the draft Plan and its policies could encourage a more effective and efficient use of land to better address this vital matter, as required by the National Planning Policy Framework.

#### S17.1. Development Strategy: Wem Key Centre

JR Planning & Development supports the identification of Wem as a Key Centre where strategic growth is envisaged. Wem benefits from a very good level of service provision. Perhaps principal amongst those services is a train station which provides direct trains to Shrewsbury, Hereford, Cardiff and Crewe (a rail hub which provides very good links for multiple destinations in the north of England).

Wem also benefits from a primary school, a secondary school, sports clubs, a town hall, several bars and pubs, several restaurants, a good level of employment, a supermarket, a cricket club, a church, a

doctor's surgery and a high street parade of shops. It is clear therefore that Wem is one of the most sustainable settlements in Shropshire for its level of facilities and also for its very good bus and rail links to Shrewsbury and other larger settlements where there are more extensive facilities.

The pre-submission draft Plan suggests at S17.1 (2) that Wem could accommodate "around 600 dwellings". It is our contention that, given the services on offer and the number of edge of settlement sites which are relatively constraint free and which can be readily assimilated into the built milieu, 600 dwellings should be expressed as a *minimum* target. This would provide a degree of certainty to the delivery figure for Wem and by extension, Wem's contribution to the overall housing land supply requirement for the county over the plan period.

### S17.1 (i) Residential Allocations: Wem Key Centre

Draft Policy 'S17.1 (i) Residential Allocations: Wem Key Centre' allocates three sites for housing at Wem including site WEM033 which is known as Land off Whitchurch Road. The allocation of WEM033 is strongly supported for the following reasons.

#### Site location

Wem town centre is just 800 metres from the site and the settlements facilities are within walking distance of the site. The most distant supermarket is the furthest identified facility from the site being 1.1km away and this is still a distance which Manual for Streets advises is truly walkable. Crucially, the train station, doctor's surgery, school and the closer supermarket are all within 800 metres of the site, whereby occupants of dwellings on the site would be very likely to walk those journeys regularly.

The site is connected to the town and its facilities by a footpath which. The footpath could readily be extended along the site frontage to ensure safe and convenient continuous access for all. The site therefore has a truly sustainable location.

#### Environmental impact

The site is free of significant technical constraint. There are no heritage assets nearby and the site isn't, nor is it adjacent to, a biodiversity designation. Similarly, there is no landscape designation on or near the site. The entire site is within flood zone 1, the development of which is preferred by the Framework for its low probability of fluvial flooding.

The site is an enclosed field which benefits from hedgerow boundaries on all sides. It has a flat topography which severely inhibits views from medium-long distance vantage points. At a short range, as approached from the countryside to the north, the development would be readily assimilated into the built backcloth of the existing town and specifically Oakley Meadow. As approached from the town, the site, with an appropriate design, would appear as a natural extension to the settlement. The site has a strong vegetative boundary to its north which, with an appropriate landscaping scheme, would help to improve the setting of the town as viewed from the north.

The site's development wouldn't require 'piecemeal' development of a larger field but would rather comprise the holistic development of a suitable parcel of land on the edge of the existing settlement with 'defensible' boundaries to unplanned development further north.

It is also notable that the roadside hedgerow is set back from the carriageway edge whereby there may be scope to provide a footpath between the site access and the existing pavement network without even having to remove or translocate the hedgerow, thereby further minimising any landscape impact.

### Access

Access to the site would be via Whitchurch Road as per the 'Development Guidelines' expressed in the draft policy. JR Planning & Development have engaged a Transport Planner and Engineer to review the detail of said access. Whitchurch Road has a straight axis as it comes from the north and passes the site. Visibility requirements can be met.

### Dwelling numbers

The Policy expresses that the site could accommodate 60 dwellings. JR Planning & Development made representations to the Preferred Option Consultation, expressing that the site could accommodate more than 60 dwellings. That view is maintained.

Indeed, this view is also supported by the Strategic Land Availability Assessment which expressed the view that the site could accommodate 90 dwellings. Since the publication of the SLAA, no assessment has explained why a reduced density is required here other than its edge of settlement location.

The site has an area of c. 2.8ha which yields a site density of just 22 dwellings per hectare (dph). That is an unusually low density with sites tending to yield between 30 and 50 dph.

The NPPF (2019) places greater emphasis on making effective use of land. The NPPF (2019) dedicates an entire chapter to the topic, promoting it from a single paragraph under the 'Design' chapter of the previous iteration. The NPPF acknowledges that site characteristics remain an important consideration in determining development density, however here, the site is entirely free from environmental designation and has a densely settled context. There is, in our view, no reason to artificially reduce site capacity.

We suggest that an appropriate density for the site would be in the region of 30 dph. A development at this density would allow for an appropriate site layout which acknowledges the edge of settlement location, whilst also affording space for extensive landscaping to help assimilate the site with its countryside setting to the north and to provide biodiversity enhancement. Crucially, the increased density would result in a scheme for 84 dwellings, an additional 24 dwellings when compared with the draft policy position. The additional dwellings would be crucial in addressing housing need in the county. As the uplift in dwelling numbers could be achieved without demonstrable harm, it would embody a more effective use of land in accord with the aims and objectives of the NPPF.

This is particularly pertinent in the context of the evidence base for development at Wem as the preferred options paper identified that existing services at the town are burdened, such as schools and the doctor's surgery. To alleviate pressures, extensions to existing facilities or new facilities will be required. The allocation of a significant level of housing and the associated CIL and S106 contributions are the most likely method of achieving the financing necessary to provide such infrastructure upgrades.

#### Availability and deliverability

To reiterate, the site is in single land ownership which removes a potential issue in terms of deliverability – it is oft the case where many landowners are involved with a single allocation, that legal matters hold up the delivery of the site. Further, a pre-application submission is presently being prepared ahead of a formal submission which demonstrates that it is truly available. The timely submission of an application also demonstrates that there is potential for the site to deliver housing early in the plan period thereby helping to avoid early housing land supply issues for the Plan Review.

Importantly, we submit that the site is deliverable in the first five years of the plan period (2020-2025) and not 10-15 years into the plan period as expressed by 'Forecast of Delivery Timescales for Local Plan Allocations' at Appendix 7 (page 341). This is a real benefit of the site given the difficulty often encountered in bringing housing sites forward in the early part of the plan period.

#### Concluding remarks

JR Planning & Development supports the allocation of site WEM033 and confirms that it is available, deliverable and achievable. It is ideally situated to provide access to services and facilities within the settlement and is free from technical constraint. There is also opportunity to provide safe vehicular access. The site has a modern and densely built context whereby, through appropriate design and landscaping, there is potential for the site to accommodate a development which would not only assimilate with the existing town but would enhance its setting.

However, draft Policy 17.1 (i) explains that the site could deliver 60 dwellings which represents a density of just 22 dph. Such a density is low for a site which is without technical constraint and which has such a densely built setting in the context of the NPPF's requirement to make effective use of land. Accordingly, we suggest that the site has capacity to accommodate 84 dwellings and that the policy is amended accordingly. This is supported by the Strategic Land Availability Assessment carried out by the Council which expressed the view that the site could accommodate 90 dwellings.

In conclusion, JR Planning & Development agrees with Shropshire Council that site WEM033 should be allocated as per the *Pre-submission Draft Plan*. However, it is suggested that the site is allocated for approximately 84 dwellings which can be delivered in the first five years of the plan period.

Thank you for considering our representation and please contact me should you require any further information.

Yours faithfully,

Matt Tompkins

**Director**

*cc. Jason Richards (JR Planning & Development), Ed Thomas (TTP)*