

## Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

We have also published a separate Guidance Note to explain the terms used and to assist in making effective representations.

### Part B: Representation

Name and Organisation:	Metacre Ltd.
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#### Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

#### Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="S17"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                          |     |                                     |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/>            |
| B. Sound                                 | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/>            |

*(Please tick as appropriate).*

#### Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

*If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.*

Please refer to the accompanying documents:

- Part B - Metacre (26-02-21) S17 - Supporting Submission
- Part B - Metacre (26-02021) S17 Appendix A
- Part B - Metacre (26-02021) S17 Appendix B (Parts 1-3)

*(Please continue on a separate sheet if necessary)*

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

*Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

An additional housing allocation is proposed on Lowe Hill Road, Wem. Please refer to the accompanying documents:

- Part B - Metacre (26-02-21) S17 - Supporting Submission
- Part B - Metacre (26-02021) S17 Appendix A
- Part B - Metacre (26-02021) S17 Appendix B (Parts 1-3)

*(Please continue on a separate sheet if necessary)*

*Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

*After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

- No, I do not wish to participate in hearing session(s)
- Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Metacre Ltd. wishes to make further representations on the points raised above.

*(Please continue on a separate sheet if necessary)*

*Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature: Andrea Caplan

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

# S17 Wem Place Plan Area

## Proposed Allocation

Policy S17 Wem Place Plan Area, highlights the importance of Wem as a Key Centre that contributes to strategic growth in the north-east of the County. As such a development guideline for 600 new dwellings in Wem is identified in Policy S17.

The policy identifies new allocations for residential development in the edges of Wem (including WEM010 and WEM025) and saves allocation WEM003, which was identified in the adopted SAMDev. **An additional residential allocation on the western side of Wem is proposed, as shown in figure 1 (shaded yellow).**

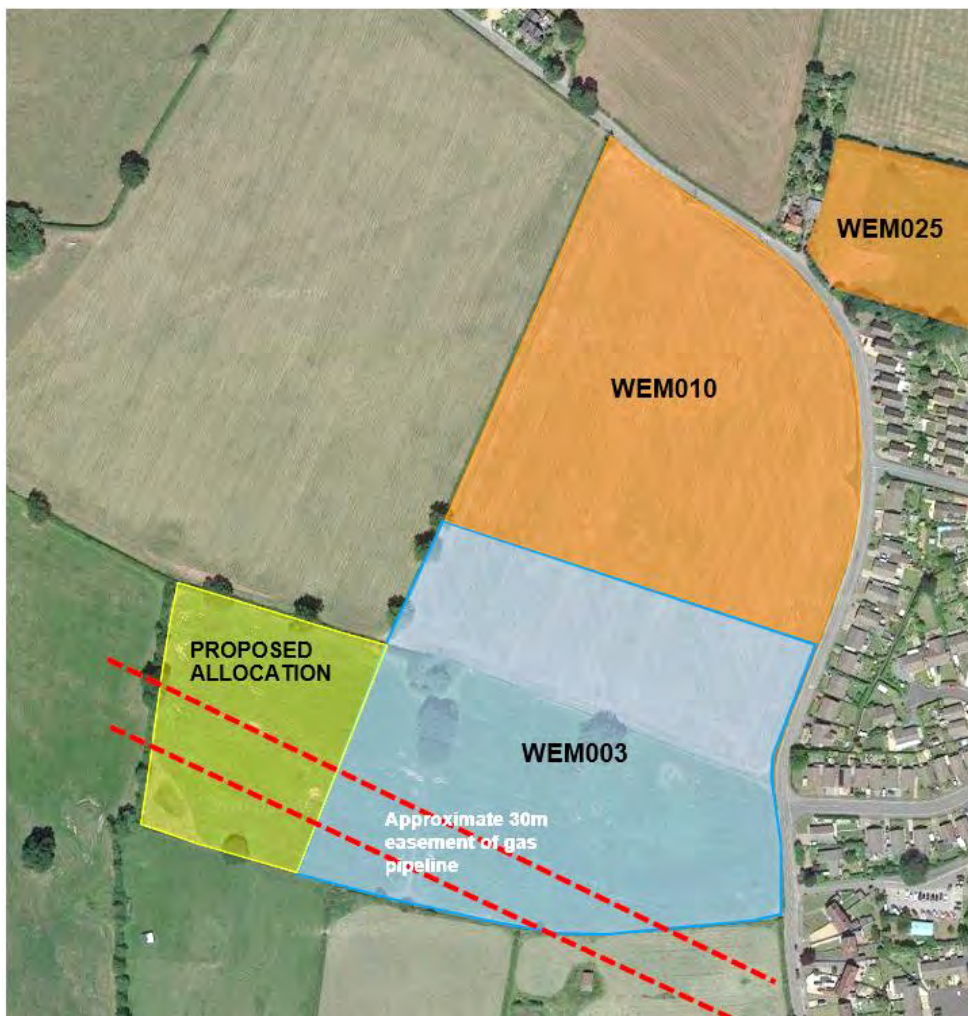


Figure 1 – Proposed Allocation, Lowe Hill Road, Wem

As set out in previous representations, a gas pipeline has been identified crossing the southern section of the WEM003 site (shown in figure 1). It is now not possible to provide the 100 units included in the WEM003 allocation, while also delivering a development at an appropriate density for this urban edge

location, which also retains the mature trees on site, delivers suitable landscaping and provides an appropriate level of public open space.

The additional 1.58 hectare site is therefore put forward to deliver approximately 25 dwellings. This would form part of the housing to be delivered through the saved WEM003 allocation, which is allocated for 100 units.

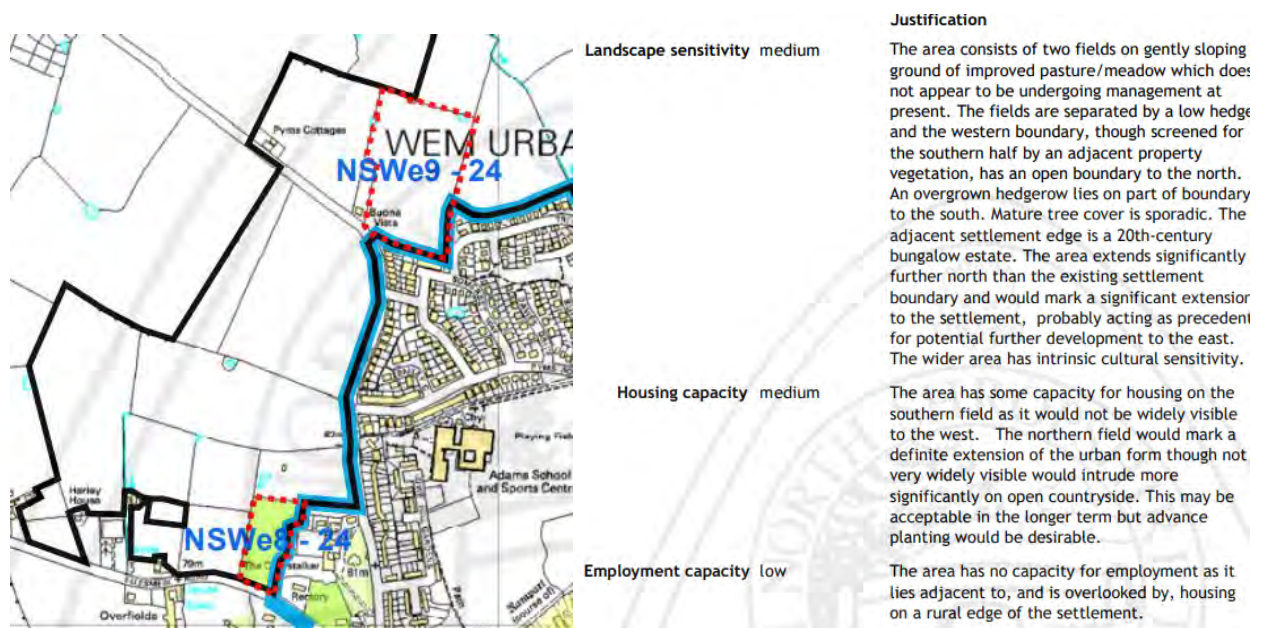
The proposed additional allocation is currently outside of the development boundary for Wem and therefore is within the countryside. However, it is well related to Wem and its development would come forward with WEM003. Both sites would then also have the potential to link to the proposed allocation WEM010, creating a comprehensive development area on the western side of Lowe Hill Road.

## Landscape Evidence Base

As the proposed allocation is currently open countryside, the local plan evidence base has been reviewed in relation to the sensitivity of the landscape surrounding Wem and the potential impacts the proposed allocation would have on the surrounding countryside.

The adopted SAMDev evidence base considered the appropriateness of new residential development extending Wem's settlement boundary. The North Shropshire Landscape Sensitivity and Capacity Study (March 2008) considered the landscape constraints around Wem and the sensitivity and capacity of a number of sites (as selected by officers and marked by a red dashed line). The plan extract is include below as figure 2. The study did not identify any specific constraints relating to the proposed allocation site or surrounding land. Moreover, site NSWe9-24, north of the site was considered to have a medium landscape sensitivity and a medium landscape capacity for housing.

**Figure 2 - North Shropshire Landscape Sensitivity and Capacity Study (March 2008) – Plan Extract and Assessment Text for NSE29-24**



The assessment for the NSWe9-24 site also noted that the area has medium visual sensitivity as the area is gently undulating, which limits very wide views.





The Site Assessment for allocation WEM003 identified the site as having medium landscape sensitivity, based on the assessment for site NSWe9-24. The site was recommended as a preferred option, as it is a 'good strategic location relative to alternatives, limited environmental constraints, opportunities to masterplan and phase if required'.



**Figure 3 - Extract from  
Adopted Policies Map (S17  
Wem)**

The Shropshire Landscape & Visual Sensitivity Assessment (2018) considers land surrounding Wem and forms part of the evidence base for the current Local Plan review. For the western / northern section of Wem, within which the proposed allocation site falls, the assessment concludes that:

**Landscape Sensitivity** – *This is a generally intact landscape of pastoral fields with recreational features including The Shropshire Way, Wem Market Town and Cycle Rides and the River Roden, which are locally enjoyed. Overall, the sensitivity of the landscape to change arising from new housing is medium and to employment is medium-high.*

**Visual Sensitivity** – *This is a landscape with very gently rolling landform with intervisibility to the settlement edge. The medium scenic quality combined with intervisibility with the settlement edge means views experienced are of medium sensitivity to change arising from new housing and medium-high to employment.*

The overall sensitivity for the proposed allocation site and surrounding area for housing development is assessed as 'medium'. The level of sensitivity was recorded on a six-point scale (low, medium-low, medium, medium-high, high and very high).

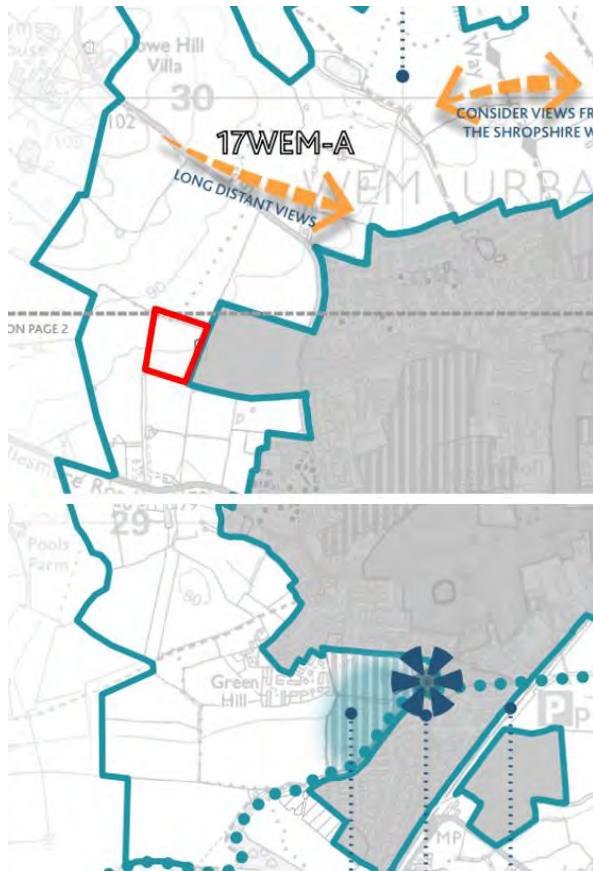
The three residential allocations proposed in Wem (WEM010, WEM025 and WEM033) are located within this area of 'medium' sensitivity, as is the additional site proposed to the west of WEM003.

Based on this assessment, the Design Guidance for Wem, as set out in the report (figure 4 below):

- Does not identify the proposed allocation site and its surrounding land as having 'higher landscape sensitivity to development' or 'higher visual sensitivity to development' (while several areas to the east of Wem are considered to have higher sensitivity);



- Does not identify any designated features or visitor destinations in or near to the proposed allocation site;
- Does not include any important landscape features which should be retained are located in or near to the site.
- Does not identify any long distance views passing through or close to the site.



**Figure 4 - Shropshire Landscape & Visual Sensitivity Assessment (2018) – Extract**



The SAMDev Review Site Assessment (2018) for WEM010, which lies to the north east of the proposed allocation site, noted that *‘the site lies outside, but adjacent to the development boundary and adjoins the existing housing SAMDev allocation which is expected to deliver in 2019, and is therefore considered a natural extension to the settlement.’* The assessment confirms there are limited environmental constraints relating to the site.

In light of this it is not considered that any specific landscape features have been identified to restrict the allocation of land to the west of saved allocation WEM003. The western edge of the proposed allocation is delineated by an established hedgerow and tree lined boundary which would form a clear edge to the open countryside.

## Site Proposals

A masterplan and site specific Landscape and Visual Impact Assessment have been produced for the proposed allocation site and the adjacent WEM003 saved allocation site, copies of which are included



as Appendices A and B. The masterplan illustrates an outline layout for a modest density housing scheme, set within a strong axis of landscape buffers which include the retention of valuable trees (in arboricultural and amenity terms), improvements to the existing boundary hedgerows, flood and drainage attenuation and an equipped area of play. The scheme also takes into account the easement of the gas line that runs through the southern section of the site.

The assessment identifies that the landscape character of the area will remain largely intact. The field itself changes inevitably from grazing/arable use to built form, however the field pattern, the key features (such as the trees) and the overall rural nature of the area between Lowe Hill, Wem and the outlying farms remains.

The development will not appear as dense, solid development, in line with the understanding of built form generally though this area outside the settlement edge. Instead it will be broken up by vegetation and small groups of buildings in a strong landscape context. Generally, the impact on the landscape character within the study area is considered to be low.

Visually, as expected, the masterplan proposals are most noticeable from the residential, road and PRoW users in closest proximity to the site. These receptors will experience visual impacts as the direct rural view is changed. However, the number receptors and the timeframe for experiencing the change is limited. The proposed additional allocation area, to the west of WEM003, will not be visible from Lowe Hill Road, as it will be screened by future development within the saved allocation and the proposed allocation WEM010.

Users of the PRoWs within the study area would be aware of the change but due to the local topography and intervening vegetation their experience will be mostly limited and residential development on the site would not be the focus of their views.

It is concluded that in landscape and visual terms the proposed allocation represents an appropriate extension to Wem.

## **Summary**

The proposed allocation will enable the delivery of the identified housing requirement for Wem in combination with WEM003 and the other allocations identified in the area.







**Key**

- Proposed access position
- Application Boundary
- Primary movement
- Secondary and tertiary movement
- Pedestrian movement
- Development platforms
- Indicative block orientation
- Dual aspect block will turn corners
- Indicative tree planting
- Existing Landscaping
- Approximate amenity/public open space
- New drainage ditch for retained farmland
- Drainage ditch access track

Lowe Hill Road, Wem, Shropshire  
**Masterplan**

Drawing Number: WD18-13-MP01-G  
 Scale: 1:1000  
 Date: October 2019  
 Sheet Size: A1