

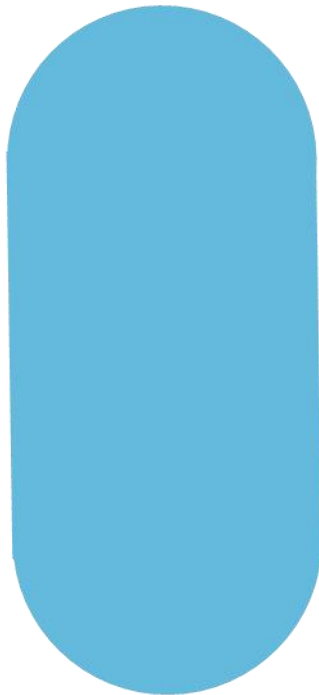


Representations

Shropshire Local Plan
Examination Additional Documents Consultation

Bellway Homes Limited

June 2024





1. The following representations are made in response to the publication and consultation of an additional four documents supporting the Shropshire Local Plan (SLP) Examination on behalf of Bellway Homes Limited ('Bellway Homes') in respect of their land interest north of Aston Road, Wem.
2. The documents subject to this consultation are:
 - GC25: Newly Proposed Draft Policy on Housing Provision for Older People and Those with Disabilities and Special Needs
 - GC44: Additional Sustainability Appraisal Report (April 2024)
 - GC45: Updated Housing and Employment Topic Paper (April 2024)
 - GC46: Updated Green Belt Topic Paper (April 2024)
3. These representations should be read alongside the submitted Site Location Plan, Wem Settlement Plan, Illustrative Concept Plans and Vision Document.

Housing Land Requirement and Delivery

4. The Additional Sustainability Appraisal Report and Updated Housing and Employment Topic Paper have been produced further to the Inspectors request in their Interim Findings for clarity on the issue of housing and employment need, requirement and delivery in the Local Plan.
5. The Additional Sustainability Appraisal Report concludes that Option 3b is the most sustainable option, that being the High Growth forecast plus an additional 1,500 dwellings contribution to the unmet needs anticipated to arise in the Black Country. This results in a housing requirement across the Plan period of 31,300 dwellings, which equates to an average of 1,423 dwellings per annum, an increase of 500 dwellings to the 30,800 dwellings housing requirement set out in the submitted SLP.
6. In terms of accommodating the 500 dwelling uplift, the Additional Sustainability Appraisal Report considers four options:



- Option 1: Increasing Settlement Guidelines and Windfall Allowances
 - Option 2: Densification of Proposed Site Allocations
 - Option 3: Increasing Site Allocations
 - Option 4: A Combination of Town or More of the Other Options
7. The Additional Sustainability Appraisal Report concludes that Option 1 is the most sustainable option, on the basis that it achieves the most appropriate 'balance' across all three pillars of sustainability. The Updated Housing and Employment Topic Paper seeks to justify the implementation of Option 1 by providing evidence of windfall delivery in Shropshire since 2018/19 and commentary on future windfall delivery prospects.
8. Bellway Homes disagree with the Council's approach to dealing with meeting the 500 dwellings uplift in housing requirement, and instead consider that further allocations should be made in the SLP to provide certainty that the revised housing requirement can be delivered in full.
9. Firstly, whilst windfall development has been high in Shropshire since 2018/19, limited evidence is provided on the ability of existing settlements in Shropshire to continue to make provision for windfall growth in the coming years. This is particularly important given the National Planning Policy Framework (NPPF, December 2023) at Paragraph 72 requires compelling evidence that windfall development will provide a reliable source of supply to justify its inclusion.
10. Indeed, as set out in Figure 1 of the Updated Housing and Employment Topic Paper, both the amount and percentage of windfall development in Shropshire has significantly and consistently decreased since 2018/19. It is also noted that a significant proportion of the net dwellings committed on windfall sites as of 31st March 2023 are on medium and large scale windfall sites of 5 or more dwellings. By their nature, opportunities for windfall growth on medium and large scale sites will deteriorate over time without policy intervention, i.e. through additional policy measures which seek to increase growth rather than maintain the status quo. Thus, the downward trajectory of windfall delivery is highly likely to persist.



11. Whilst Option 1 is inevitably going to perform best in the Additional Sustainability Appraisal Report, it is noteworthy that Paragraph 10.51 sets out that “none of the reasonable options identified for accommodating the uplift to the proposed housing requirement are likely to result in a strongly negative effect”. This being a significant adverse impact that is predicted to be direct, permanent, irreversible and of major magnitude on a large part or the whole of Shropshire, a nationally/internationally protected asset, or on areas outside the County. As such, mitigation would not be required for any of these reasonable options”.
12. Further, the preference of Option 1 over Option 3 is justified on the basis of the positive sustainability outcomes associated with Option 1 being more significant than Option 3 and the risks of negative sustainability outcomes associated with Option 1 being lower than Option 3, primarily due to the increased certainty regarding the urban focus of development. However, that inference doesn’t consider the potential for land which falls outside of the Settlement Guidelines to be better located to access existing services, public transport provision and active travel corridors, and thus is more likely to deliver sustainable development than windfall opportunities within the Settlement Guidelines.
13. In conclusion, Bellway Homes consider the Council’s approach to be not effective nor consistent with national policy and therefore cannot be considered sound in line with the NPPF.
14. To remedy this, the Council should instead consider seeking to allocate an additional 500 dwellings in Shropshire to ensure deliverability of the SLP housing requirement in full. This should include Land North of Aston Road, which although abuts the Settlement Guidelines boundary for Wem, is well-located to provide sustainable development.

Land North of Aston Road, Wem

15. Land North of Aston Road, Wem is being promoted by Bellway Homes for residential development in the SLP. The boundaries of the Site are identified in the enclosed Site Location Plan.



16. The Site is located on the eastern edge of Wem, adjoining the existing built edge. Existing residential development bounds the Site to the West, extending along part of the northern boundary. Wem Cricket Club and an industrial area also bound the Site to the north. The southern boundary is formed by Aston Road, with Aston Road Business Park beyond. Agricultural fields are located to the east.
17. The Site benefits from excellent connectivity, situated in a sustainable location within walking and cycling distance of the train station and facilities within Wem. It forms a logical location for the delivery of new homes for Wem.
18. Wem is recognised in the Submitted SLP as a Key Centre which will contribute towards growth objectives in the north-east of the District, delivering around 600 dwellings and 6 hectares of employment development. Draft allocations for approximately 210 dwellings have been identified in Wem, to be delivered over three sites in the north-east and north of the town, beyond the current Settlement Boundary.

Strategic Land Availability Assessment

19. The western part of Land North of Aston Road has been considered in the Strategic Land Availability Assessment (SLAA, 2018) supporting the SLP, reference WEM038. WEM038 was considered not currently suitable but with future potential for development subject to further detailed assessment. Commentary on the issues identified in the SLAA is provided in the preceding Paragraphs.

Access

20. The ability to provide an appropriate access to and into the site is queried in the SLAA assessment of WEM038, as well as accessibility to services and facilities.
21. As set out in the accompanying Illustrative Concept Plan, vehicular accesses can be provided from Aston Road and Church Lane, connected by a primary route through the Site.
22. In terms of accessibility, as shown in the attached Wem Settlement Plan the majority of the Site is within 800m of the train station, which equates to a 10 minute walk. The vast array of services and facilities in Wem are also highly accessible generally within



a 15 minute walk of the centre of the Site via the existing public footpath from Aston Road to Oak Avenue over the railway bridge; the development of this Site could contribute to improvements to this Public Right of Way to include surfacing and lighting where appropriate. There are also a number of bus stops within close proximity of the Site which serve the 201, 511 and 512 services which operate between Whitchurch and Shrewsbury via Wem.

23. Aston Road includes a footpath until it reaches the property known as The Chestnuts, which is less than 100 metres from the proposed Site access on Aston Road. It is considered that development can readily facilitate connection with the existing footpath to support active travel connectivity between the Site and the services and facilities in Wem.
24. As such, it is considered any concerns in relation to the provision of access and accessibility of the Site are unfounded.

Trees

25. The SLAA assessment of WEM038 notes that the Site contains a tree subject to TPO protection, and thus development would need to be subject to an assessment of impact on the protected tree in order to demonstrate how it can be safeguarded.
26. It is not clear which tree is subject to a TPO on the Site, however existing boundary trees and hedgerows can be retained and enhanced where possible, including in order to achieve at least 10% Biodiversity Net Gain. In any case, it is considered that a tree subject to a TPO can be accommodated in the development through careful masterplanning.
27. As such, it is considered any concerns in relation to impact of the development on protected trees are unfounded.

Historic Environment

28. The SLAA assessment of WEM038 references the Site being within close proximity of a Listed Building, and therefore development will need to be subject to an



assessment of impact on the significance of the setting of this heritage assets, and weighed against the public benefits of development.

29. The nearest Listed Buildings to the Site are in Aston to the south-west, and are unlikely to be impacted by the development of the Site.

30. As such, it is considered any concerns in relation to impact of the development on the historic environment are unfounded.

Conclusion on SLAA Assessment

31. The SLAA assessment of WEM038 is generally positive, and concludes that the future potential for development subject to further detailed assessment

32. Issues raised are limited to highways and accessibility, trees and the impact on the historic environment, all of which are considered to be unfounded or easily overcome through careful masterplanning or delivery of the development.

Sustainability Appraisal

33. WEM038 is also subject to assessment in the Sustainability Appraisal (SA, 2020) supporting the SLP. The SA concludes that WEM038's overall sustainability is Fair, with a score of -2; note the majority of sites assessed in Wem score Fair or Poor.

34. However, it is noted that the assessment process in the SA is simplistic and doesn't take account of any mitigation or masterplanning measures which could improve the overall sustainability of the Site.

35. For example, WEM038 scores a negative for being within 300m of a Listed Building, as do most sites in Wem, however the likely impact of development of WEM038 on the setting of any Listed Building is negligible at best. WEM038 scores a negative in this case, which would be the same score for a site which fell immediate adjacent to a Grade I Listed Building, for example.

36. Further, no account is taken of likely infrastructure delivery or improvements which would be delivered through development. For example WEM038 scores a negative for distance from Amenity Green Space, however this could be delivered on site.



37. As such, it is considered that the SLP should be mindful that the assessment of WEM038 in the SA is not representative of the highly sustainable development which could be achieved on the site.

Conclusion

38. Land North of Aston Road, Wem is considered to be a suitable site for residential development and should be allocated in the SLP.

39. A Vision Document has been prepared which sets out Bellway Homes' vision and aspirations for the Site. Land North of Aston Road, Wem will create a sustainable, high quality and locally responsive addition to the town. A focus on placemaking and sustainable design will create a place for the whole community.

40. The proposals will enhance connectivity, promoting sustainable transport and active travel links.

41. Extensive new areas of public open space, including a new play area, planted attenuation basins, new tree planting and recreational routes will ensure an attractive and healthy place, for people and the environment.

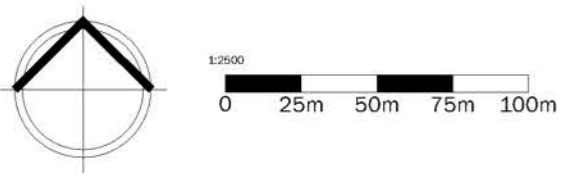
42. The Vision Document presents two Illustrative Concept Plans which demonstrates how the Site could deliver up to 270 dwellings, or as an alternative deliver a smaller scheme of circa 140 dwellings focused to the west.

43. The proposals demonstrate that the Site has the capacity to deliver a beneficial and sustainable development that brings forward much needed high quality housing and new areas of public open space. The Site is located in a sustainable location, making it a logical Site for much needed new homes within the settlement.

44. As such, it is respectfully requested that Land North of Aston Road, Wem is allocated in the SLP for an indicative 270 dwellings, or a smaller allocation of circa 140 dwellings if this was considered more appropriate. This action will assist in ensuring the deliverability of the SLP housing requirement in full.



- Site boundary (12.96ha)
- - - Existing PRow
- Proposed vehicular access
- - - Potential secondary access point
- Potential pedestrian connection
- Primary route
- Indicative development area (7.8ha, @30-35dph = 234-273 dwellings approx.)
- · · Indicative recreational route
- * Proposed play area
- Indicative attenuation area
- 1 Proposed tree planting & landscape buffer
- ▲ Listed building



status **PRELIMINARY**

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project title **Land off Aston Lane Wem, Shropshire**

client **Bellway Strategic Land**

drawing title **Illustrative Concept Plan Option 2**

drawing no. **900182.69-SK02.2**

scale **1:2500 @A3**

date **January 2024**

drawn by **SM**

checked by **-**

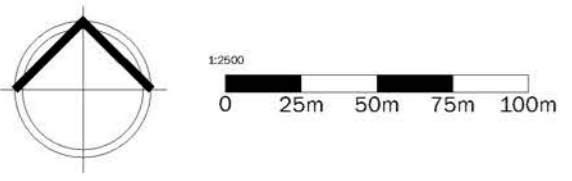
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- Site boundary (12.96ha)
- - - Existing PRow
- ➔ Proposed vehicular access
- - - Potential pedestrian connection
- Primary route
- Indicative development area (4.0ha, @30-35dph = 120-140 dwellings approx.)
- ⋯ Indicative recreational route
- ✱ Proposed play area
- Indicative attenuation area
- 1 Proposed tree planting & landscape buffer
- ▲ Listed building



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project title **Land off Aston Lane Wem, Shropshire**

client **Bellway Strategic Land**

drawing title **Illustrative Concept Plan Option 1**

drawing no. **900182.69-SK02.1**

scale **1:2500 @A3**

date **January 2024**

drawn by **SM**

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Land north of Aston Road, Wem

Vision Document | June 2024



Executive Summary

This document has been prepared by Marrons on behalf of Bellway Strategic Land to demonstrate the strategic development opportunity for the land north of Aston Road, Wem.

The proposals demonstrate that the Site has the capacity to deliver a beneficial and sustainable development that brings forward much needed high quality housing and new areas of public open space. The Site is located in a sustainable location, making it a logical Site for much needed new homes within the settlement.

This document sets out Bellway's vision and aspirations for the Site, to support engagement with key stakeholders.



Our Vision



Land north of Aston Road, Wem will create a **sustainable, high quality** and locally responsive addition to the town. A focus on **placemaking** and **sustainable design** will create a place for the whole community.

The proposals will enhance **connectivity**, promoting **sustainable transport** and **active travel** links.

Extensive new areas of **public open space**, including a new **play area**, planted attenuation basins, new **tree planting** and recreational routes will ensure an attractive and **healthy place**, for people and the environment.



Planning Policy Context

Development Plan

The Local Development Plan in Shropshire was drafted and adopted following the 2009 grouping of the five District authorities of Bridgnorth, North Shropshire, Oswestry, Shrewsbury and Atcham and South Shropshire together into one Unitary Authority which serves the purpose as both a singular District and County Council. It comprises the Core Strategy DPD, adopted in February 2011, and the Site Allocations and Management of Development Adopted Plan (SAMDev), adopted in December 2015.

The adopted SAMDev identifies a minimum figure of 27,500 new dwellings to be delivered in the District between 2006 and 2026, an average of 1,375 per annum. Growth is distributed throughout the District in accordance with the Settlement Hierarchy, which identifies the Sub-Regional Centre of Shrewsbury, 17 Key Centres and a number of Community Hubs and Cluster Settlements. Wem is identified as one of the 17 Key Centres, which the SAMDev identifies should collectively accommodate approximately 40% of the planned housing provision during the Plan period.

The Site falls outside, but directly adjacent to, the designated Settlement Boundary for Wem, as shown on the Policies Map. Policy MD3 seeks to resist residential development outside of the defined Settlement Boundaries unless the settlement is unlikely to meet its housing requirement. The Site is otherwise not otherwise impacted by any Core Strategy or SAMDev designations.

Emerging Development Plan

Shropshire Council are at an advanced stage of preparation of the Shropshire Local Plan 2016 to 2038 which will plan for growth in the District to 2038 and replace the Core Strategy and SAMDev when adopted. The Council published a pre-submission draft of the Local Plan in December 2020, with the decision to submit the plan to Examination being made at a Council meeting on the 15th July 2021. The plan was formally submitted to the Secretary of State on 3rd September 2021.












Across the Plan period, the Council has identified a need for housing of 28,750 homes (an average of 1,430 per annum) based on a 'high growth scenario'. The draft Local Plan plans for 30,800 dwellings, with the increase from the identified need to account for a contribution to meeting unmet needs for housing arising in the Black Country.

The draft Local Plan seeks to retain Wem as a Key Centre which will contribute towards growth objectives in the north-east of the District, delivering around 600 dwellings and 6 hectares of employment development. Draft allocations for approximately 210 dwellings have been identified in Wem, to be delivered over three sites in the north-east and north of the town, beyond the current Settlement Boundary.

The Site in Context

The Site is located on the eastern edge of Wem, adjoining the existing built edge. Existing residential development bounds the Site to the West, extending along part of the northern boundary. Wem Cricket Club and an industrial area also bound the Site to the north. The southern boundary is formed by Aston Road, with Aston Road Business Park beyond. Agricultural fields are located to the east.

The Site benefits from excellent connectivity, situated in a sustainable location within walking and cycling distance of the train station and facilities within Wem. It forms a logical location for the delivery of new homes for Wem.

-  The Site
-  Existing settlement
-  Draft allocations
-  Playing fields / sports
-  Watercourse
-  Flood zone 2
-  Flood zone 3
-  Train station
-  Railway line
-  Key routes
-  Pedestrian route from Site



Plan not to scale





Opportunities & Constraints

Access & Movement

Primary access is proposed via a new junction from Aston Road to the south, with the potential for a secondary access from Church Lane to the north.

There are existing Public Rights of Way (PRoWs) to the north and south of the Site. There is an opportunity to connect to these routes with new recreational routes through the Site, providing enhanced pedestrian connectivity and plugging into the wider movement network.

Landscape & Ecology

Existing boundary trees and hedgerows should be retained an enhanced where possible. There is the opportunity to strengthen the existing hedgerow within the Site.

There is the opportunity to provide a significant area of new public open space towards the east of the Site. This could include new areas of native tree planting, wildflower meadow planting and recreational routes. This area could soften the transition from the development edge to the countryside beyond.

There is an existing pond in the north of the Site. This should be retained with the opportunity for enhanced planting and landscaping in this area.

Existing and new landscape corridors, habitats and green linkages could provide ecological and biodiversity benefits.

Flood Risk & Drainage

The Site is relatively flat, with a gradual fall towards the east. It is located in Flood Zone 1, meaning that it is at a low risk from flooding and is broadly suitable for development. There is the opportunity to provide sustainable drainage in the form of

planted attenuation basins, managing surface water run off and providing amenity and biodiversity benefits.

Existing Residential Development

Existing residential rear / side boundaries are located along the western boundary and part of the northern boundary. The proposals should look to respond sensitively in this area, with properties backing onto this boundary to ensure safety and security.

Existing Utilities

Overhead cables crossing the Site are anticipated to be diverted or underground. Therefore this is not expected to present a constraint to development



-  Site boundary
-  Existing trees / hedgerows to be retained
-  Public Right of Way
-  Proposed vehicular access point
-  Potential secondary access point
-  Potential pedestrian connection
-  Overhead cables
-  Rear / side residential boundaries
-  Existing pond
-  Indicative attenuation area
-  Potential landscape buffer
-  Flood zone 2
-  Flood zone 3
-  Listed building

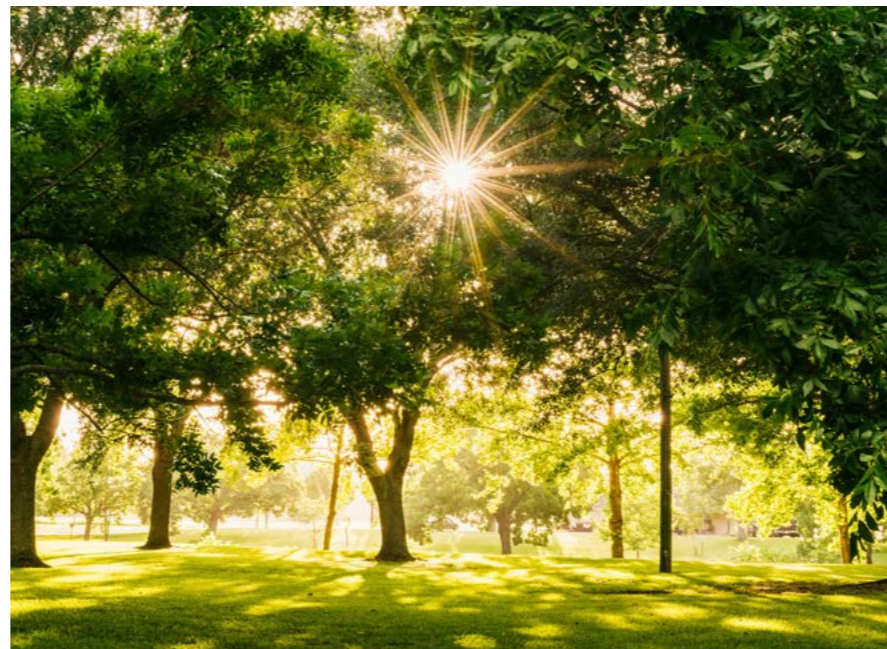














Plan not to scale



Development Proposals

- The proposals demonstrate the capacity of the Site to deliver up to 270 high-quality new homes, set within landscaping and new areas of public open space.
- Primary access is proposed from Aston Road to the south, leading to a tree lined primary street through the development. There is potential for a secondary access from Church Lane to the north, with additional linkages from the new recreational route providing connectivity with the wider PRow network.
- There is the opportunity to create a distinctive place that responds to the local context and character. The pond towards the north of the Site is retained with new areas of landscaping and a recreational route provide connected habitats, green linkages and promoting health and well-being.
- The existing hedgerow running north-south within the Site is proposed to be retained and enhanced, creating a green corridor through the development. This links with a new equipped children's play area at the heart of the development, creating a new focal space for new and existing residents. New SuDS and landscaping will provide amenity, ecological and biodiversity benefits.
- The Site also has the potential to deliver additional community benefits if required.
- The proposals demonstrate strong urban design and placemaking principles. Outward facing blocks with active frontages and a legible movement hierarchy will provide clear definition between public and private space and ensure passive surveillance of the public realm.



-  Site boundary
-  Existing PRow
-  Proposed vehicular access
-  Potential secondary access point
-  Potential pedestrian connection
-  Primary route
-  Indicative development area
-  Indicative recreational route
-  Proposed play area
-  Indicative attenuation area
-  Proposed tree planting & landscape buffer
-  Listed building



Plan not to scale



Development Proposals - Alternative Option

- Whilst the scale of the Site can accommodate up to approximately 270 dwellings, with scope to deliver additional community benefits, the proposed Site could also come forward as a smaller scale development focused to the west, as demonstrated on the adjacent page, if this was considered more appropriate.
- This demonstrates a proposed development of up to approximately 140 dwellings, with a new play area, recreational routes and linkages to the wider PRow network.
- The smaller option proposes vehicular, pedestrian and cycle access from Aston Road, with additional pedestrian and cycle connectivity to Church Lane.



-  Site boundary
-  Existing PRow
-  Proposed vehicular access
-  Potential pedestrian connection
-  Primary route
-  Indicative development area
-  Indicative recreational route
-  Proposed play area
-  Indicative attenuation area
-  Proposed tree planting & landscape buffer
-  Listed building



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Key Development Benefits



Up to 270 new homes

A variety of new high quality homes in a mix of sizes and tenures to meet the needs of the local community.



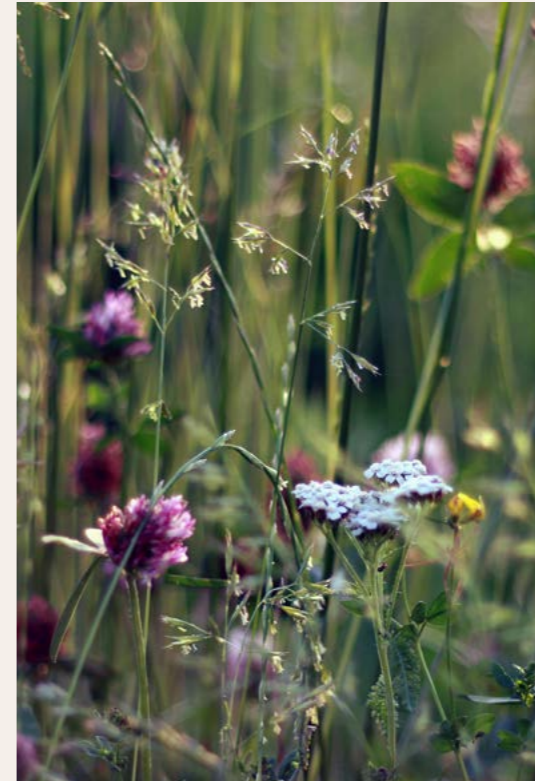
Extensive public open space

New areas of public open space, including a new children's play area, recreational routes, and planting for the benefit of new and existing residents.



Sustainable and connected

The proposals are sustainably located, benefiting from proximity to Wem Station and facilities within the town. New connections are made with the surrounding area, maximising active and sustainable travel.



Habitats, ecology and biodiversity

The proposals have the potential to deliver ecological and biodiversity benefits, protecting habitats and creating new areas for wildlife to thrive.



Deliverable

The proposals demonstrate the capacity of the Site to deliver new homes for Wem. Bellway have a proven track record for delivering high-quality developments, with significant expertise and resources, working collaboratively with stakeholders and the local community.



About Bellway

Bellway

STRATEGIC
LAND



Bellway have a wealth of experience and expertise, and have been delivering high-quality developments for over 75 years.

Bellway began as a small family business in 1946 - with a passion for building exceptional quality homes in carefully selected locations, inspired by the needs of real families. These same core values, underpin their work today, combining decades of expertise with the level of personalised care that Bellway is known for.

Today Bellway are a FTSE 250 major PLC housebuilder delivering 10,945 new homes across the UK for the full year to July 2023. In 2024, they were awarded five star housebuilder status for the 8th year in a row. This is a result of their emphasis on build quality, customer care and health and safety, to build and sell high quality homes to suit local housing styles as well as providing social housing to housing associations.

Since their beginning over 70 years ago, Bellway operate a number of trading divisions which are located in the main population centres in England, Scotland and Wales. This structure enables their divisional management teams to use their locational knowledge and working relationships to buy land, design, build and sell homes which are attractive to their customers and help to build local communities.



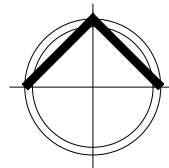
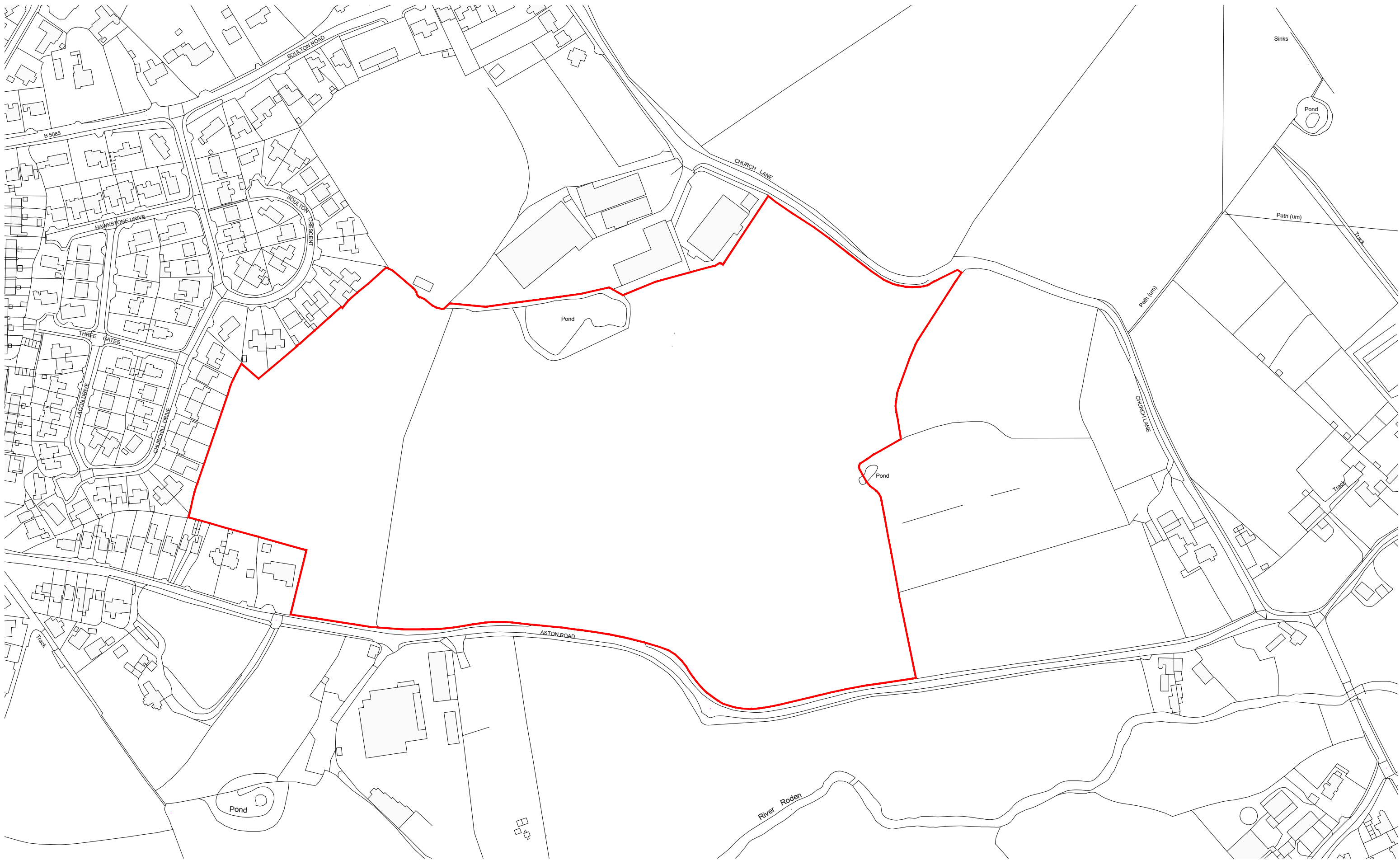
BETTER WITH
Bellway

Better with Bellway

It is our sustainable approach to business practices which forms a key part of our strategy for putting people and the planet first. More information on this can be found at <https://sustainability.bellwayplc.co.uk/> the initiative sets out 8 priorities for the business including Carbon Reduction, Quality and Safety, Biodiversity and Charitable Engagement.

Our commitment to Carbon Reduction includes the pioneering Energy House 2.0 project in conjunction with Salford University; a £16m temperature-controlled chamber at the University. This research facility will play an important role in testing the technologies that will make our homes greener and cheaper to run in the future. Our wider commitments have seen a 24% reduction in our emissions per home sold and by the end of 2023 all electricity purchased by Bellway will be renewable.





— Site boundary (12.96ha)

status **PRELIMINARY**

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project title **Land off Aston Lane
Wem, Shropshire**

client **Bellway
Strategic Land**

drawing title **Option Plan**

drawing no. **900182.69-SK01**

scale **1:2500 @A3**

date **January 2024**

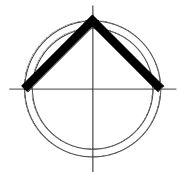
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- Existing settlement
- Draft allocations
- Playing field/sports
- Watercourse
- Flood zone 2
- Flood zone 3
- Train station
- Railway line
- Key routes
- The Site
- Pedestrian route from Site

status **PRELIMINARY**

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project title **Land off Aston Lane Wem, Shropshire**
 client **Bellway Strategic Land**
 drawing title **Wem Settlement Plan**

drawing no. **900182.69-SK03**
 scale **Not to scale**
 date **February 2024**
 drawn by **SM**
 checked by **-**
 revision **-**

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