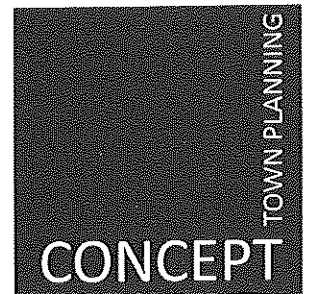


30 APR 2014



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Planning Policy Team  
Shropshire Council  
Shirehall,  
Abbey Foregate  
Shrewsbury  
SY2 6ND

Dear Sirs,

**RE: SAMDev Plan Pre Submission Draft March 2014 – Representations made on behalf of  
Mr Peter Broomhall – Land off Saulton Road, Wem**

We write in response to the above document on behalf of our client and with regards the promotion of land to the south of Saulton Road, for employment land purposes. Detailed representations examining the suitability of the proposed land for accommodating the employment land provision for Wem have previously been prepared and remain entirely applicable on the basis that no changes have been made to the current document to reflect our recommendations.

Accordingly, we write to re-iterate our objection to the proposed site allocations document on the grounds that it is considered unsound and unjustified.

Primarily the reasons given for favouring the preferred option sites over other suitable alternatives promoted does not hold water. Section 17.1 of the current document states that the preferred allocations have been chosen on the grounds that they will ***"...limit cross town traffic and to reflect safety and congestion concerns regarding the railway crossing to the east of the town"***

In examining this point further, the location of the proposed employment allocation lies to the south of the town and away from the existing and established employment areas and away from the serving population, including the preferred site to accommodate the additional housing needs of the town. Its position is one which cannot avoid cross town traffic being generated by residents accessing the location and, as a result, will also increase vehicular movements at the key junctions in town, namely the junction of Mill Street and High Street and High Street and New Street. These junction have been identified by the Council in their documentation as being at issue.



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With regards the matter of the railway crossing, the document continues to blight the development of the eastern side of Wem as a result of perceived congestion concerns associated with this junction. We are aware from examining the background evidence of the SAMDev that this stems from a response from the Town Council and that there is no other evidence or technical data to examining its physical capacity. Therefore, such a blanket restriction on development to the east of the town is considered to be unjust and detrimental to the development of the town.

In view of the forgoing, it is our position that the preferred employment allocation for Wem remains disjointed and its location is one which would generate cross town traffic and would impact upon the aforementioned junctions. To the contrary, employment to the east of the crossing, as proposed by our representations, would support and underpin the existing employment provisions already within this area and which is safeguarded under policy MD9. Such allocation would also better link with the highway network which exists at present, providing links to Whitchurch and Shrewsbury, without affecting cross town traffic. Further, employment provision to the east of the crossing would offer a more sustainable solution to the current preferred sites, particularly given the close proximity of the railway station and associated transport links to the town centre and beyond.

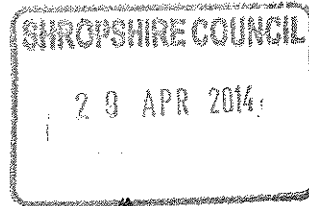
Overall, it is considered that the pre-submission document remains ill informed and, again, has moved no further forward than the previous revision. Consequently, the document is considered to be unsound with regards the promotion of employment land to the south of Wem and it is our position that the land promoted on behalf of our client offers a more appropriate alternative.

We trust the above comments will be duly considered alongside the detail previously set out and we shall look forward to confirmation of receipt of our representation in due course. Should the Council require any further information or assistance in the meantime then we would request that you do not hesitate to contact us.

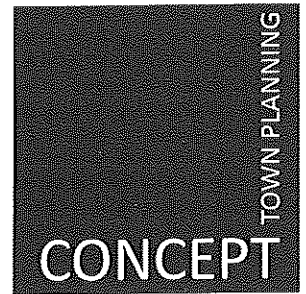
Yours faithfully,

Steven P. Hearn  
Concept Town Planning Ltd.

Cc. Peter Broomhall



Shropshire Council  
Development Services  
Shirehall, Abbey Foregate  
Shrewsbury  
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Dear Sirs,

**Re: SAMDev Plan Pre Submission Draft – March 2014 – Representations made on behalf of Mr Gerald Smith**

I write on behalf of my client Mr Gerald Smith in relation to the consultation on the above document. Our response follows previous representations in relation to sites advanced on behalf of my client, namely land referred to in the relevant documentation as Wem014R, Wem015R, Wem016A and Wem033.

Fundamentally, all previous comments and detailed objections remain entirely applicable on the grounds that the Council's preference to support the original Preferred Development sites is unjustified and unsound.

Section 17.1 of the current document states that the preferred allocations have been so chosen on the grounds that they will ***"...limit cross town traffic and to reflect safety and congestion concerns regarding the railway crossing to the east of the town"***.

Turning to each point raised above, once again the document continues to blight the future development of the eastern side of Wem as a result of perceived congestion concerns associated with the railway crossing. This stems from nothing more than a response from the Town Council and is not supported by any form of technical / physical assessment of capacity etc. This is also contrary to the assessment undertaken on behalf of my client and submitted at the preferred option stage which identified that the junction can readily accommodate additional development, as proposed.



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With regards the matter of reducing cross town traffic, whilst this may be the case for the site at Tilley, it cannot be said for the site at Lowe Hill Road. As demonstrated previously and at 5.174 of the current document, the Council accepts that a high proportion of the population of Wem commutes to Shrewsbury for employment and shopping. To this end if, the preferred allocation at Lowe Hill Road were to be realised, this would require new residents to cross town and negotiate 3 recognised difficult junction points, namely 'Maunds Corner', the junction with New Street and High Street and the junction of High Street and Mill Street. In comparison, if development land to the east of the crossing were to be allocated, then alternative routes exist to allow access to both Shrewsbury and Whitchurch, thereby offering a tangible alternative to the generation of cross town traffic.

In our previous representation in 2012 a detailed comparison was also undertaken examining the preferred site against my client's interests, using the various criteria utilised by Shropshire Council in the assessment document. As defined previously, it was not only found that the Council's assessments lacked appropriate technical supporting data and were solely limited to desk top appraisals but also that my clients' interests performed better in many respects, than the preferred sites. This remains entirely the case and our representations at the forthcoming hearing sessions will confirm.

With regards the proposed employment allocation, again this remains a disjointed option and its location is one which would still generate cross town traffic and will impact upon the aforementioned junctions. This is particularly true in respect of the proposed location for new housing on Lowe Hill Road. To the contrary, employment to the east of the crossing, as proposed by our representations in support of the land adjoining Wem033, would support and underpin the existing employment provisions already within this area and which is safeguarded under policy MD9. Such allocation would also better link with the highway network which exists at present and provides links to Whitchurch and Shrewsbury, without affecting cross town traffic. Further, employment provision to the east of the crossing, in line with the better performing housing sites proposed by my client, would offer a more sustainable solution to the current preferred sites, particularly given the close proximity of the railway station and associated transport links to the town centre and beyond.

Overall, it is our position that no credible evidence or justification has been provided by the Council to continue to support the preferred option sites and that the alternative options presented on behalf of my client represent entirely sustainable future development options, which should be considered more favourably than the Council's preferred sites. Further, there is also a complete lack of consistency and scientific approach in terms of how the assessment criteria utilised for appraising each proposed site has been applied and also in terms of responding to representation made at previous stages of review. Certain comments have been accepted whilst others ignored and this will be draw out at the hearing sessions to test the soundness or otherwise of the document.

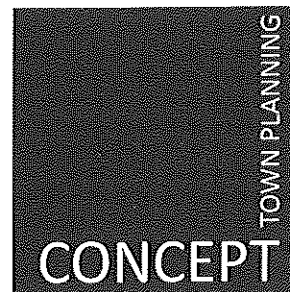
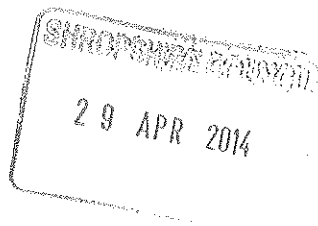
Given that above and our previous detailed comments, we are of the opinion that the SAMDev pre-submission document is unsound and appropriate scrutiny and examination at future hearing sessions will confirm this.

I trust that our comments will be duly considered alongside those made previously and should the Council require any further information or wish to discuss any matters in more detail in the meantime, then we would request that you do not hesitate to contact us.

Yours faithfully,

Adrian W. Burn  
**Concept Town Planning Ltd.**

Mr G. Smith	-	J P Smith and Sons.
R. Smith	-	J P Smith and Sons.



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Dear Sirs,

**RE: SAMDev Plan Pre Submission Draft – March 2014 – Representations – On behalf of the Blake Trustees**

On behalf of the trustees of land to the north of Fismes Way (Wem0031/09) we write to provide our comments in respect of the content of the above document. Our response follows previous representations in relation to the site which remain entirely applicable.

The current consultation is to test the soundness of the final draft before submission to an Inspector and having examined it in detail, we consider that the document remains fundamentally flawed. We have set out in detail previously where we consider the document to be lacking and there have been no amendments made which would suggest to us that the document could in any way be considered sound.

Section 17 of the pre-submission document sets out the development strategy for Wem and confirms that the allocated housing sites have been so chosen in order to limit the potential for cross town traffic and to reflect concerns over the railway crossing to the east of the town. As set out in detail in our previous representations, the land north of Fismes Way performs equally as well as the preferred site in both respects and there are no technical reasons why the land at Lowe Hill Road should be favoured when measured against such criteria. Our previous representations also demonstrated how the site performs as well and, in many respects, better than the preferred site, when examined objectively against the various other site selection criteria used by the Council.

Furthermore, as stated previously, the land to the north of Fismes Way represents a natural continuation to the built form of Wem, with strong defensible boundaries and is consistent with the historic development of the town in terms of previous housing allocations. In comparison, the



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preferred site represents an unnatural incursion into open countryside, with no defensible boundaries to limit future development or views into or outwith of the site. The preferred site would offer no benefits over the development of the land at Fismes Way and thus offers no tangible justification for being preferred as a future allocation by the Council.

in this regard and when considering the site allocation requirements for the town in a holistic sense, it is our view that my client's land offers a more appropriate option and, we remain convinced that the land to the north of Fismes Way offers a more sensible alternative to the preferred option.

Finally, as set out in our previous representations, the SAMDev document has not been informed by any technical assessments or detailed studies, evident by the way the Council's have selectively taken on board particular responses ahead of others. This is demonstrated with examples in our previous representation and will be drawn out further at the hearing sessions. Ultimately, it is our position that the approach taken by Shropshire Council in the delivery of the SAMDev document has been flawed throughout the entire process and the preferred allocations put forward for Wem are neither sound or justified.

I trust our comments will be duly considered as part of the ongoing review and I shall look forward to confirmation that our response has been registered. Should the Council require any further information, then please do not hesitate to contact us.

Yours faithfully,

Steven P. Hearn  
Concept Town Planning Ltd.

Enc.

Cc.	Julie Blake	-	Blake Trustees
	Margaret Williams	-	Blake Trustees