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Ms Gemma Smith,  
Casework Officer,  
Planning and Environment Decisions Wales,  
Planning Inspectorate  
Crown Building,  
Cathays Park,  
Cardiff,  
CF10 3NQ

WELSH GOVERNMENT - 2

14 SEP 2023

Date: 12<sup>th</sup> September 2023

Dear Ms Smith,

**Planning and Environment Decisions Wales Ref: CAS-02639-F8F7J9 25<sup>th</sup> August 2023**  
**LPA ref P/2022/0869**  
**ERECTION OF 9 NO DWELINGS LAND EAST OF CADNEY LANE BETTISFIELD SY13**  
**2LW**

We are writing to confirm the Maelor South Community Councils objections in respect of the appeal made to the Planning Inspectorate regarding the original application made to Wrexham County Borough P/2022/0869. Because this proposal is submitted in outline form with just means of access for determination at this stage, our objections are focused on matters of principle. The grounds of objection are as follows:

1. Bettisfield is a small hamlet situated approximately 15 miles from Wrexham city centre in open countryside where farming and other rural activities predominate. Oswestry and Whitchurch lie at somewhat similar distances in Shropshire, with the smaller but closer Ellesmere town located to the west. Future housing need in Wrexham County Borough to 2028 should be addressed through the planning system by further housing development in those places where it is most needed, where there is substantial employment and where services can most efficiently be provided. As the only city in the Borough and having, by far, the largest population, Wrexham is the logical choice for further residential development. Putting a substantial new housing development into this inappropriate and remote village location would be unsustainable in the extreme and detrimental to the economy and environment and proper planning of the Borough as a whole.

2. Bettisfield is located close to Fens Moss (less than 2 miles and is a site of Special Scientific Interest since 1953) and the open farmland drains into culverts and open ditch drainage

systems that date back over many years. The village is low lying and relies on a ditch network to move water from Bettisfield Road to Moss Lane. According to the Environmental Agency for Wales (NRW) Bettisfield village sits above a minor aquifer and is (in the main) unsuitable for soak away of sewage effluent. It has no watercourses with sufficient dilution for the Agency to permit the discharge of sewage. The Agency does not accept the promotion of sealed septic tanks. The changing weather patterns and small number of additional houses built over recent years has already resulted in a high risk of flooding into local properties. Previous planning applications in the area have been rejected on these grounds by the previous Planning Inspectorate for Wales. (Please see attached photographs and extract from that report)

3. Turning to policy matters. The application (P/2022/0869) performs badly when measured against many of the policies cited. In particular:

- Policy EC5 (Special Landscape Area). The development would have an adverse impact on the landscape by substantially obstructing views of the open countryside. The development would not blend into the environment but would extend it to the detriment of the open character of Bettisfield.
- Policy H5 (Housing in the countryside). By no stretch of the imagination can this scheme be regarded as 'infilling'- which is commonly defined as the development of a *small gap* in an otherwise substantially developed frontage. The proposed site is an integral section of a significantly larger field (approx. 80 acres) used for growing crops and forage. This scheme would destroy the open nature of a substantial tract of farmland.
- Policy PS2 (Development and the environment). Development of this greenfield site would materially and detrimentally affect countryside, landscape character, open space, and the quality of the natural environment.
- Policy PS4 (Settlement pattern). This development would not maintain the existing settlement pattern and character and would not help reduce the overall need to travel. Many of the new residents would be likely to travel by car to distant places of employment.
- Policy T8 (Parking, transport). The village is only served by a single bus in the week that leaves Bettisfield on a Monday at 10.00am and returns from Wrexham at 2.00pm. There are no other bus services.
- Policy GDP1 (Development objectives). Building a development here would not accord with the open character of the site and would not make a positive contribution to the appearance of the locality.
- Policy GDP2 (Capacity of infrastructure and community facilities). There is no need for further housing development here to support the very limited community facilities. Bettisfield has no streetlights, mains gas, or a mains sewerage system and Cadney Lane is in a poor state or repair and liable to flood after and during heavy rain events. Children of all ages must be taken to schools in local villages / towns, there are no shops or doctors surgery located in the village.

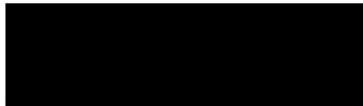
4. Bettisfield has been subject to a similar application dated November 2021 (which was subsequently withdrawn) and one approximately 15 years ago that was subject to an appeal to the Planning Inspectorate (extract attached document Policy PS1 Cadney Lane Bettisfield is attached with this letter) The findings of this report fully support the Maelor South Community council's objection to this application.

In summary, we believe it would be wrong to approve further housing development on this site. Bettisfield is classified as a **"Teir 5"** and a hamlet which is unsuitable for further development. It would open the surrounding land for future and more extensive development. The settlement infrastructure and local service would not be able to accommodate the extra pressures, resulting in an extreme risk of flooding to existing homes, roads, and farmland. It would deprive Wrexham town of a proper and fair share of housing land based on its population size and level of economic activity. It would harm the rural character of the area and the settlement characteristics of Bettisfield.

Such a decision would add to the feeding frenzy of landowners and developers wishing to get their own share of the action (and profit) before the doors are closed with the forthcoming publication of a Local Development Plan.

Will you please inform us when a site visit is planned as a member of the Maelor South Community Council would wish to be present to answer any questions or points of further clarification.

Yours sincerely,



John Gallanders  
Clerk to Maelor South Community Council

Cc: Mr. John Griffiths  
Chair of Maelor South Community Council

Inc: Photographs of recent flooding  
A copy of the previous planning inspectorate report Policy PS1 Cadney Lane, Bettisfield







**POLICY PS1 (Bettisfield: Cadney Lane)**

**OBJECTIONS :** 82/34, 58/37, 115/92, 123/100, 183/112, 571/230

**ISSUES :**

3.40 Delete from within the settlement boundary of Bettisfield an area of frontage land to Cadney Lane lying between the properties Sycamore Cottage to the north and Kendlewood to the south.

**CONCLUSIONS :**

3.41 The objection land of 0.6ha is unenclosed and forms part of the wider open countryside and farmland lying to the west of Cadney Lane. Inclusion of this land within the settlement boundary will almost certainly lead to its development by housing. The Council considers that this would comprise infill development. I disagree. Infill development is generally understood to be development of one or two houses within a substantially built-up frontage. This site could accommodate at least twelve dwellings. I noted on my site visit that there were houses under construction and potential for further housing development within the settlement boundary elsewhere in Bettisfield. No local need has been advanced for this development.

3.42 Cadney Lane has a strongly rural character with wide verges, hedgerows and hedgerow trees. It has restricted width for two vehicles to pass each other, and narrows to a single lane on approaching the objection land from the north. Housing development on the land would require highway improvements that could harm the special character of Cadney Lane. The development would serve to join up and consolidate the existing frontage development along Cadney Lane and it would accentuate this ribbon-like form of housing, particularly as viewed from the road to the west (running south from Cambrian View) across the Special Landscape Area. Bettisfield is a village devoid of facilities and employment opportunities. Occupants of new housing will be heavily reliant on the use of the car for access to these requirements in other centres.

3.43 The objection land is not a sustainable location for housing development. Its development would lead to the loss of greenfield land and would result in a detrimental incursion into the rural landscape. If the Council concur with my recommendation, it would seem logical for the Special Landscape Area designation to apply to this land also, in view of its continuity of character and well-established boundaries. I have noted the concerns regarding to foul and surface water drainage, but these are matters that can normally be overcome.

**RECOMMENDATION :**

**3.44 THAT THE SETTLEMENT BOUNDARY OF BETTISFIELD, WEST OF CADNEY LANE, BE MODIFIED TO EXCLUDE THE LAND AREA AS DEFINED IN THE OBJECTIONS AND IN THE WREXHAM REBUTTAL EVIDENCE WXM/82/34.**