

"The Hollies"
Ellesmere Lane
Penley
Wrexham
LL130LP

31st January 2019

The Planning Inspectorate
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Dear Sir/Madam

Planning Inspectorate ref: H6955/A/18/3219039
Outline planning application P/2018/0469
Erection of 8 dwellings and construction of new access.
Land opposite Madras School, Overton Road, Penley, Wrexham
Appellants: Mrs Mary Evans
LPA: Wrexham County Borough Council

We refer to the above appeal and wish to register my planning objections to this proposal.

An earlier letter of objection dated 4th of July 2018 was submitted at the application stage and was supported by 46 fellow Penley residents and this should already have been forwarded to you by Wrexham County Borough Council.

Our grounds of objection are as follows:

1. Penley is a small settlement situated approximately 12 miles from Wrexham town 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 south. Future housing need in Wrexham County Borough to 2028 should logically 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 town in the Borough and having, by far, the largest population, Wrexham is the logical choice for further residential development. In contrast, Penley has only a modest number of jobs on a low key industrial estate and there is little prospect of additional employment being provided in the village in the foreseeable future. Putting another new housing development into this inappropriate and remote village location would be unsustainable in the extreme and detrimental to the economy and proper planning of the Borough as a whole.

2. Penley has received more than its fair share of new residential development over the last few years with much of it concentrated, quite properly, onto the former Penley Hospital brownfield site now known as Penmere Park. That development, by Morris Homes Ltd, has yielded 110 units of

accommodation. It meets local needs, with a number of those houses currently on the market. If further residential development is essential in Penley to 2028, then there is brownfield land immediately adjacent to Penmere Park on its north-eastern flank at **Tupa, Penley Hall Drive (PENL05CS – 1ha)**, being the site of other redundant hospital buildings, as well as other brownfield land at **Penley Hall Industrial Estate (North) (PENL001UCS – 1.1ha)**. Those sites are amongst 10 blocks of land (including the appeal site) that have been put forward by various landowners for future housing development to 2028 in response to the pre-deposit public consultation on the Wrexham Local Development Plan 2 (2013-2028) Preferred Strategy. If all were fully developed at a conservative estimate of only 36 units per hectare they would yield about 720 dwellings! Eight of those parcels comprise greenfield land. In addition to those sites the Council has, we believe, granted planning permission for 7 dwellings off Tudor Drive, 3 dwellings adjacent to Lane End, and 14 houses along Ellesmere Lane and 13 houses at Big Green Farm. We would be happy to show any of these sites to the Inspector if a visit is made to the site.

3. The essential character of Penley village derives from its relatively low density and spread out form. It features a number of concentrations of built development separated by grassy fields but there is no defined village centre. Most importantly, this land lies outside the settlement limits drawn for Penley in the previous Local Plan and UDP Policy H5 and EC5. Such an alien form of development on a prominent greenfield site would harm the open farming landscape, to the detriment of the visual amenities of this rural area.

4. We cannot accept that building on a prominent greenfield site, closing off much of the open views across agricultural land of Special Landscape Value, would make a positive contribution to the settlement. This is Greenfield land of Special Landscape Value and should be fully recognised and protected as such. It is not appropriate for approval to be given on an ad-hoc basis, outside the local plan system.

5. The proposed Overton Road development fails to identify parking on the A539 during school times and there is a lack of safe crossing points. We question that the proposed access point does not meet the current design standards.

6. The applicants reference to the recent planning appeals decision reference APP/H6955/A/17/3186707 relating to up to 13 dwellings at Big Green Farm has little weight as this development refers to the redevelopment of redundant farm building and farm site. The Inspector made it clear that the decision to grant approval for Big Green Farm would not set a precedent for future development in the green barrier as future plans would be judged on their own merits at the time. (Other Matters Paragraph 25)

7. Turning to policy matters. We accept that the weight given to the Wrexham Unitary Development Plan (UDP) 1996-2011 must be tempered by its age and other material considerations - particularly national planning policy, housing land supply (already addressed in these objections) and the objective of achieving sustainable development. But these planning policies are important in providing a framework against which to test the appeal proposals. The current scheme performs badly when measured against many of the policies cited by the Council, despite the appellants' contention to the contrary. 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 built environment but would extend it to the detriment of the open character of Penley.
- 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. This scheme would destroy the open nature of a substantial tract of farmland that is indistinguishable from many similar sites within and adjacent to Penley village.

- Policy PS1 (Settlement Limits). This site is patently outside the carefully thought out settlement limits of the village.
- 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 S3 (Brownfield land). This policy requires development to occupy previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield sites - particularly where the land is of landscape value. As I have already indicated, there is still brownfield land available for development in Penley. There is no urgent need for further housing land at this time, in advance of a thorough review of competing sites assessed through the local plan process.
- 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 No 146 bus service only runs three or four times a day and does not operate in the evenings and on Sundays.
- Policy GDP1 (Development objectives). Built 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 community facilities. More than 154 new dwellings have been built in the village in recent years, and both primary and secondary schools are believed to be at or beyond capacity. Unlike some rural villages Penley is NOT threatened by a loss of population.

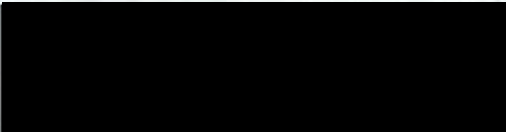
8. The draft Local Development Plan (LDP) for 2006-2021 was withdrawn in 2012 because of flaws in the plan strategy, including a shortfall in the supply of housing land and a blanket approach to landscape protection. The recently submitted LDP for 2013-2028 should yield a Deposit Draft later this year. While it is possible that some settlement boundaries might be adjusted and the Special Landscape Area become more focused I consider that little weight should be given to policies of this emerging plan at the present time.

9. In summary we believe it would be wrong to construct so many extra houses on greenfield land in an unsustainable remote village location. This 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 seriously harm the open rural character of the area and the particular settlement characteristics of Penley. Moreover, damage would be caused to the integrity of the Special Landscape Area of which it forms a part.

For all these reasons we request that the Inspector dismiss this appeal.

Please let us have, in due course, a copy of the Inspector's decision on the appeal.

Yours faithfully



John & Elizabeth Griffiths