



Planning Statement

Proposed outline planning application for the erection of 3no. dwellings and associated access following the removal of existing bungalow Caradoc, Kinnerley.

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PROJECT

Proposed outline planning application for the erection of 3no. dwellings and associated access following the removal of existing bungalow Caradoc, Kinnerley

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1. Introduction

- 1.1 This Statement accompanies an outline planning application for the erection of 3no. dwellings and associated access, following the demolition of the existing single storey dwelling called Caradoc.
- 1.2 This statement should be read in conjunction with the other documents which have been submitted as part of this outline planning application submission. These include:
- Application Forms
 - Site Location Plan
 - Indicative Site Layout Plan
 - Ecology Phase One Habitat Survey
 - Arboricultural Survey and Tree Protection Plan
 - Planning Design and Access Statement
- 1.3 The applicant RH Cambidge (Storage) Ltd is a local business that has been in Kinnerley for a number of years and is keen to facilitate provision of smaller housing in the local area.
- 1.4 This outline application follows a pre-application enquiry ref PREAPP/23/00660, which will be discussed in more detail later in the statement.

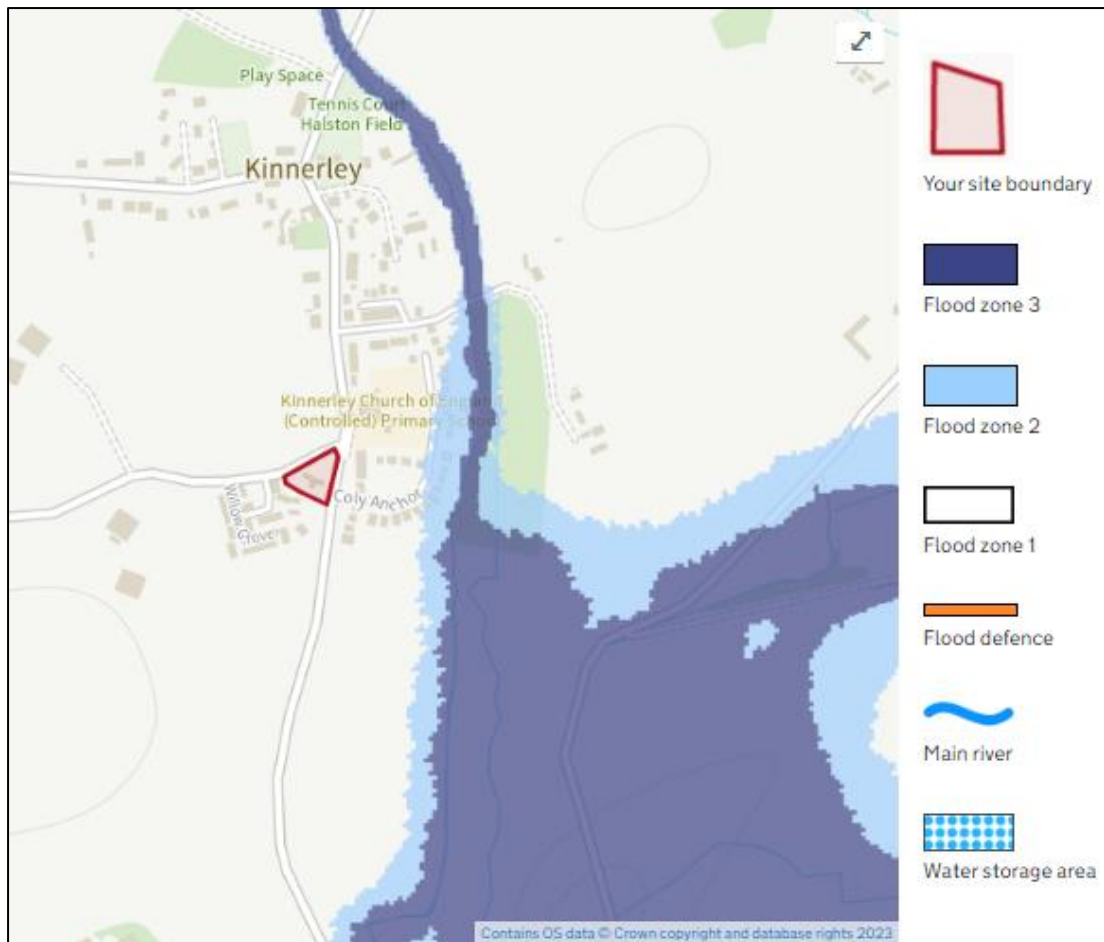
2. Site Location and Context

- 2.1 The Site is located on the southern side of Kinnerley adjoining the junction with School Lane and Argoed Road, opposite the school. It is an infill plot, situated between an existing housing development, Willow Grove to the west, further residential development to the north (under construction), the school to the east and further residential development to the south. The application site is a tenanted bungalow called Caradoc on a large corner plot site.



Location plan

- 2.2 Kinnerley is a sustainable settlement with a range of services including a village shop, post office, primary school, public house, and village hall. There is a regular bus service to and from Oswestry/Shrewsbury. We believe a footpath is to be provided along Argoed Road, providing connectivity to the aforementioned services within the village shop/church/pub/school and village hall.
- 2.3 The site is located in Flood Zone 1 (lowest risk) as demonstrated by Figure 3 below and not at risk of flooding.



EA Flood Map

Existing Property

- 2.4 This consists of a single storey dwelling on a large corner plot with an extensive garden. The existing property - Caradoc, is a T shaped building originally built in the 1940s as a single storey office used by the Ministry of Defence, before being converted to a residential dwelling.
- 2.5 The building is prefabricated and of single skin construction - this is a significant issue for consideration. Due to the prefabricated construction, it is not possible to get a mortgage on the property. Mortgage lenders do not support this type of construction because the property has been adapted and was not originally designed as a dwelling. Purchasing the property would not be possible if you needed a mortgage, it would only be available to cash buyers for example.
- 2.6 The bungalow has undergone recent renovation to improve its energy efficiency, however the T shaped design remains, which is an inefficient use of space. Energy is wasted, heating long corridors for example which proves costly for tenants and makes effective insulation difficult to sustain. Whilst the recent changes to EPC ratings on properties to let (increasing to minimum C rating) was scrapped in October 2023, the existing bungalow is again in need of modernisation and upgrading work, to meet the demand for more energy efficient homes in the rental market. The existing energy efficiency rating shows the home loses approx. 40-50% of its energy efficiency.



Existing front elevation of single storey property below

2.7 Considerable work to update the property was undertaken prior to the last tenant moving in, this included increasing the insulation, installing double glazed windows, roof and loft insulation. It is now considered difficult to improve it further mainly due to the shape and construction of the building. Due to the shape of the bungalow and inefficient use of space, ventilation can result in cold spots. Given that this building wasn't originally intended to be used as a residential dwelling, it is no longer fit for purpose and an inefficient use of land. Furthermore, the dwelling sits within a large garden that needs regular maintenance. This can make it hard to let, and onerous on tenants to keep tidy and well maintained.

Proposed Development

2.8 We therefore propose the erection of 3no. dwellings with shared access following the removal of the existing property known as Caradoc.



Proposed illustrative layout

3. Planning Policy Context

National Planning Policy

- 3.1 The NPPF sets out the presumption in favour of sustainable development as a golden thread running through plan-making and decision-taking, and specifically aims to ‘boost significantly the supply of housing’. The proposed development will help to boost housing supply and should be seen as a significant material consideration to which considerable weight should be attached. The National Planning Policy Framework was introduced in March 2012, amended in 2021 and again in 2023. At the heart of this document is a presumption in favour of sustainable development, and it acknowledges that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 3.2 As the site does not fall within greenbelt, conservation area, or landscape designated as being of national Importance, then there is no planning reason why the presumption in favour of sustainable development should not be applied to this proposal.
- 3.3 Paragraph 8 of the NPPF states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- a) an **economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

 - b) a **social objective** – to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with

accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an **environmental objective** – to protect and enhance our natural, built, and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 3.4 Paragraph 49 of the NPPF states that *'in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both: a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.'* We would argue that this application for 3 dwellings in a sustainable location, within a settlement designated for growth in the emerging local plan, is not so substantial in scale to undermine the plan-making process for the area.

Local Planning Policy

- 3.5 The Council's Development Plan comprises The Core Strategy (adopted 2011) and the Site Allocations and Management of Development (SAMDev) (adopted December 2015). Policies CS5 Countryside and Greenbelt, CS6 Sustainable Design and Development Principles, Policy CS7 states that a sustainable pattern of development requires the maintenance and improvement of integrated, attractive, safe, and reliable communication and transport infrastructure and services. Policy CS9 states that development that provides additional dwellings or employment premises will help deliver more sustainable communities by making contributions to local infrastructure in proportion to its scale and the sustainability of its location. MD2 and MD3

seeks to ensure sustainable design in the delivery of housing. MD7a seeks to manage housing development in rural areas, S14.2 Community Hub and Cluster Settlements in Oswestry.

- 3.6 Kinnerley also has a Neighbourhood Parish Plan, which was adopted in March 2013. It is a material consideration to be taken into account in the planning balance, however it is more than 5 years old and in need of updating. The sites proposed for development in Kinnerley have all received planning permission and are being built out.

Emerging Local Plan (EiP)

- 3.7 Proposed policy S14.4 of the Emerging Local Plan (paragraph 5.198) states that *'Development in the proposed Community Hubs responds to the scale and character of each area, as well as the availability of suitable development options...there are no allocations identified for Kinnerley... and instead the development of suitable infill development along with affordable exception and cross-subsidy sites in appropriate locations outside of the development boundary, will be supported where they help deliver housing which meets identified local needs.'*
- 3.8 This site is not an allocated site in the current SAMDev plan, but it does adjoin the existing development boundary for the village and is surrounded by development on all 4 sides. In the emerging local plan, the development boundary has been extended and encompasses the site making it a windfall allocation, in a sustainable location, within a designated Community Hub. This is a significant material consideration in favour of the proposal. The pre-app response from the council states *'The draft Shropshire Local Plan identifies that there have been 7 completions between 2016-2019, and as of the 31st of March there are 32 sites with planning permission. It is considered that there is capacity for further residential development in Kinnerley based on the figures referred to above... however limited weight can be given to the draft Shropshire Local Plan at this time.'*
- 3.9 There is a significant level of services accessible within easy walking distance of the site. Policy CS6 of the Core Strategy, amongst a range of

considerations, requires proposals likely to generate significant levels of traffic to be located in accessible locations where opportunities for walking, cycling and use of public transport can be maximised and the need for car-based travel to be reduced - this site meets that requirement. Policy CS7 states that a sustainable pattern of development requires the maintenance and improvement of integrated, attractive, safe and reliable communication and transport infrastructure and services. Policy CS9 states that development that provides additional dwellings or employment premises will help deliver more sustainable communities by making contributions to local infrastructure in proportion to its scale and the sustainability of its location. Development on this site would contribute towards to infrastructure provisions in the locality via CIL.

- 3.10 In accordance with both Policy CS6 and SAMDev MD2 all proposals must ensure that existing residential and local amenities are protected, further ensuring that future occupants can expect a resultant level of satisfactory residential amenity. Given the size of the site and likely orientation of the dwellings, the development is considered to have limited impact upon the amenities of neighbouring residents.

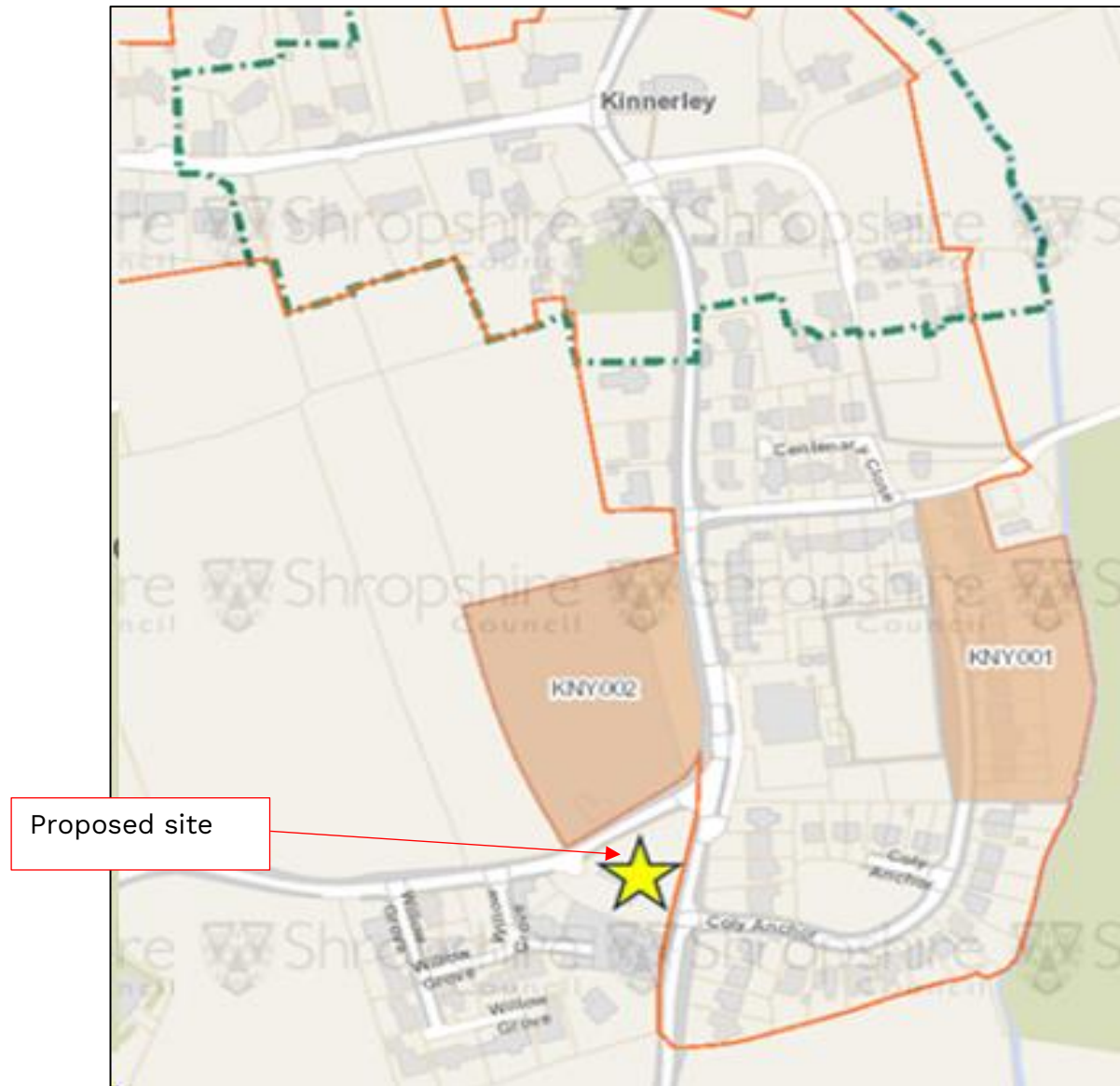
4. The Proposed Development

Scheme Overview – Current Planning Policy Vs Local Plan Review

- 4.1 This outline planning application follows a recent pre-application enquiry request. The pre-application response confirmed that officers currently deem the site to be outside of the existing development boundary for Kinnerley and located in open countryside. The response stated: *‘Policy CS5 does allow for new development in the open countryside where it maintains and enhances countryside vitality and character and improves the sustainability of rural communities. While Policy CS5 sets out a list of types of development that it particularly relates to, it does not explicitly restrict market housing in open countryside. However, CS5 is supported by Policy MD7a of the SAMDev, which does include strict control against market housing development in areas defined as countryside. Within the SAMDev Plan, Kinnerley has been identified as a Community Cluster and able to accommodate additional sustainable housing growth, to a housing guideline figure of 50, provided through infilling, conversions and small groups of houses as found at S14.2(vii) of the SAMDev Plan. Furthermore, Kinnerley has been identified with a development boundary, found at S14 Inset 2(vii), however as stated, the development site is located outside of the development boundary and is separated from the development boundary by the highway.’*
- 4.2 This is the planning policy position at the current time, under the current SAMDev Plan.
- 4.3 The local plan is however under review and is currently going through Examination in Public (EiP). The assessment of the local plan review has stalled due to a potential legal challenge on the amount of housing and employment land identified, with the Planning Inspectorate requesting further information in this regard. At the present time only limited weight can be given to it.

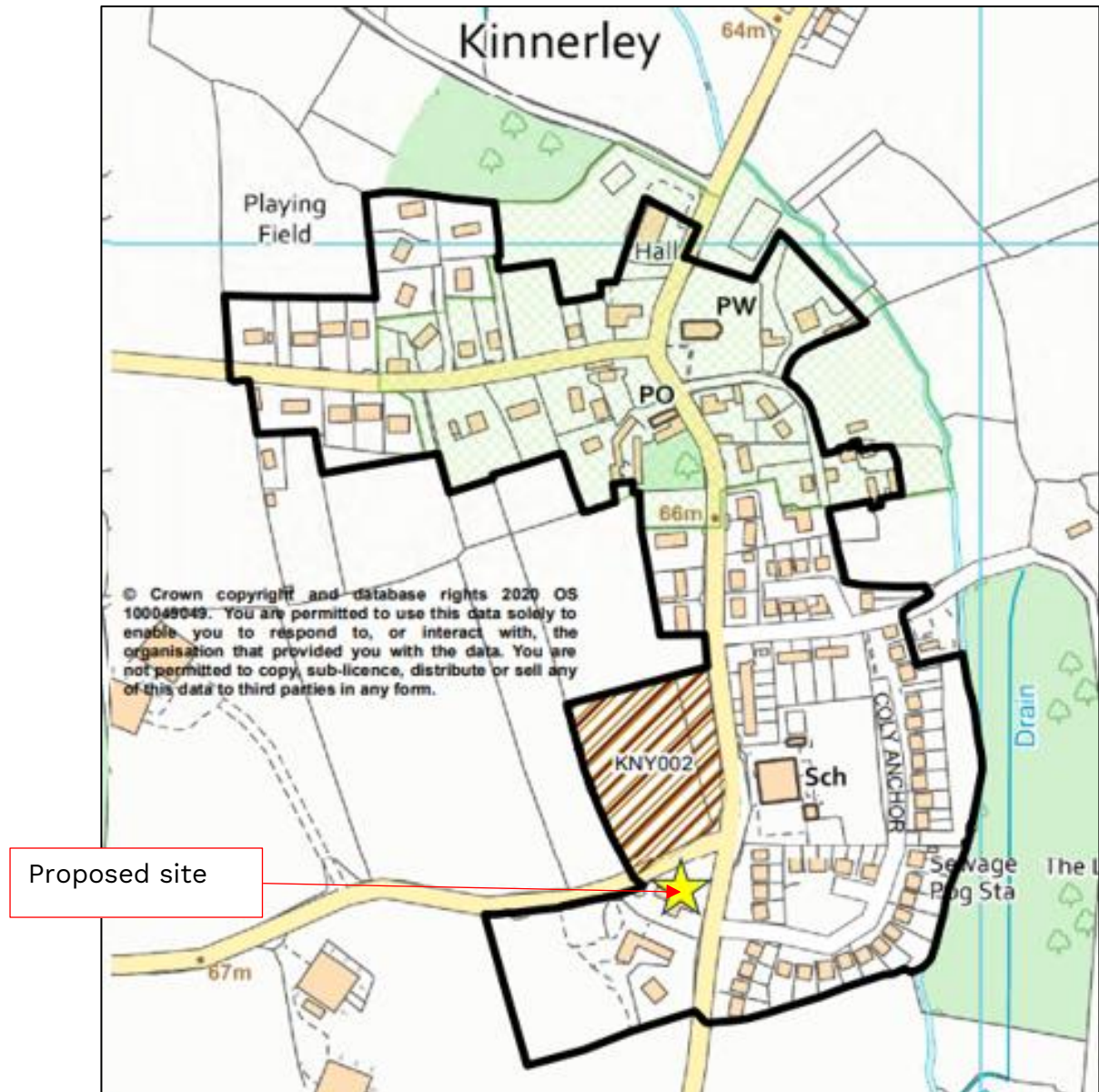
- 4.4 The above is the main issue affecting this site. The proposed site sits within an established residential area, in a highly sustainable location within the village, within easy walking distance to amenities and surrounded on all 4 sides by development. It is a classic infill plot, within a settlement designated for growth. The settlement boundary for Kinnerley is proposed to be extended in the emerging local plan and will fully encompass the site and neighbouring residential development. The pre-application response goes on to state *'Within the Draft Shropshire Plan it is stated that there are no allocations identified for Kinnerley, and instead the development of suitable infill development along with affordable exception and cross-subsidy sites in appropriate locations outside of the development boundary, will be supported where they help deliver housing which meets identified local needs. It is considered that the proposed proportions of the homes and amenity space could be acceptable'*.
- 4.5 Kinnerley Parish Council have recently discussed local housing needs and the concern about the lack of smaller more affordable types of housing available in the parish. Many people had hoped that the Kinnerley Neighbourhood Plan (adopted 10 years ago) might have provided more affordable housing. This application hopes to address this and provide homes of a size and type that meet the needs of the area.
- 4.6 Currently the settlement of Kinnerley is part of an identified Community Cluster in the SAMDev Plan along with Maesbrook, Dovaston and Knockin Heath, which will provide growth of around 50 dwellings during the plan period. The Shropshire SAMDev Plan also states that development proposals will be expected to demonstrate that they have taken account of the adopted guidance from the community led Neighbourhood Plan for Kinnerley.
- 4.7 In the emerging draft Local Plan Review, Kinnerley has been identified as providing 60 houses over the plan period 2016-2038. Of those, 39 are already in the pipeline, with 21 expected to be found on windfall sites. The site of the planning application is one of those sites. Whilst strictly not within the development boundary of Kinnerley at present, it directly adjoins it and is surrounded on all four sides by existing residential development.

- 4.8 As we are all aware, there have been significant delays in the Examination in Public of the Local Plan (EiP). In the meantime, Caradoc is still in need of further renovation/upgrade works, and so we have decided to progress this application, on the basis of the support from the emerging local plan, that wholly includes the site within the development boundary for Kinnerley.
- 4.9 Paragraph 83 of the NPPF states *'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'*
- 4.10 The picture below shows the location of the site (yellow star) and the position of the current development boundary, as per the current SAMDev Plan (identified by a red line). Whilst in planning policy terms, the site sits outside the development boundary of Kinnerley, and in open countryside, it is clear from the extract below that the site is in a highly sustainable location, surrounded by residential development on all four sides and within easy walking distance of the services and facilities available within the village.
- 4.11 The school for example, is across the road, a desirable position for families with young children. The shop and pub are located to the north of the village predominantly accessed via footpaths encouraging people to walk and cycle to the facilities available. These points must be balanced in favour of the proposal and recognition of the fact that the site has the support in principle of the parish council, local community, and planning/policy officers, by way of the proposed change to the development boundary (that would encompass the site) in the forthcoming draft Shropshire Local Plan.



Site location in current SAMDev Plan

4.12 The emerging local plan shows the development boundary of Kinnerley to be as shown below. The site is again highlighted by a yellow star and the development boundary shown by a thick black line. The site is positioned wholly within the development boundary in recognition of its sustainable location within the village.



Site location in Emerging Local Plan

4.13 This sits directly south of 16/04719/FUL approval of 18 no. dwellings, which was an allocated site for residential development in the Kinnerley neighbourhood plan. To the east of this is an approved and constructed residential development reference 14/01703/OUT & 16/00902/REM on Willow Grove, for the erection of 18 no. dwellings, which was a former industrial estate and therefore previously developed land.

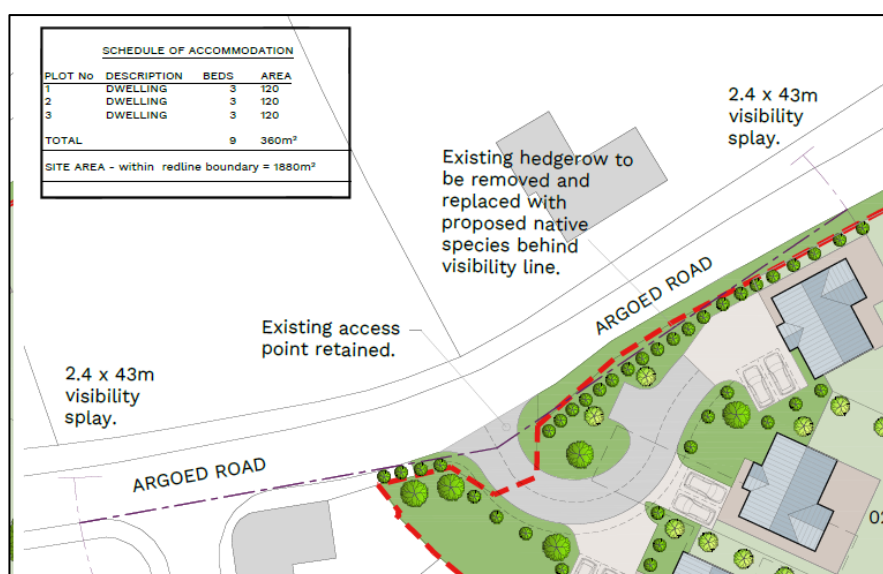
Access

4.14 Access into the site would be via the existing entrance serving Caradoc.



Access into site off Argoed Road (source Google Maps)

Works to upgrade the visibility splay are proposed to provide a 2.5 x 43m splay, in line with highway safety standards. A short section of the existing hedge would need to be replanted behind the visibility splay. This is seen as a benefit to the scheme given the restricted visibility at the entrance at present and in line with the pre-application response.



Access visibility splay shown to meet to highway safety standards

Landscaping/Trees

- 4.15 The site benefits from a mature hedgerow around the perimeter of the site and several mature trees. An arboricultural impact assessment accompanies the planning application and confirms the majority of landscaping on the site consists of overgrown hedging or garden evergreens, with just a few larger trees of higher quality.
- 4.16 The report suggests the removal of a group of trees, all category C, which are clearly visible from public perspectives but do not add a great deal to the amenity provided by trees to the area. Being large overgrown leylandiis they are incongruous to the generally semi-rural character of the village. It is likely that such trees would be removed, whether development were to take place or not. Removing and replacing these trees with those much more suited to their environment would, once the trees are established, considerably increase the amenity provided by trees to the area.

Ecology

- 4.17 In section 1.3 of the accompanying phase 1 habitat survey, produced by Greenscape Environmental, the report concludes that there are no protected species on site that would be impacted upon negatively by the proposed removal of the single storey building and its replacement with 3no. residential properties. The report states '*The site comprises a bungalow surrounded by typical residential land including driveway, patio, and garden. The site is generally of low ecological value being well maintained with limited features of ecological interest.*'
- 4.18 The building was assessed for evidence of bats. The roof tiles are extremely well set with no visible gaps under tiles, ridges or on gable ends and soffits are fully sealed and no potential roost access gaps were visible. At the time of the survey, the loft was fully accessible, and no evidence of bats was seen. None of the trees in the garden had any roost features visible from ground level.

4.19 No further ecological surveys are required, and no negative impact is expected from the proposed development. Birds may use the hedge and shrubs for nesting, and this will be taken into consideration with timing the removal to when birds are not nesting. The report concludes that there are no bodies of water within 250m, which would require an assessment for great crested newts and no evidence of badgers was seen, though previous surveys in the area found badgers crossing the field to the north. The survey therefore suggests that a check for badgers should be conducted within 30 days of work commencing to identify any changes.

5. Conclusion

- 5.1 The proposed outline application would provide 3no. 3-bedroom properties on a plot within the centre of the village in a highly sustainable location, making the most efficient use of the land. The site currently adjoins the development boundary for Kinnerley, but will soon be wholly within the adjusted development boundary when the Emerging Local Plan review progresses further at examination.
- 5.2 Government advice on prematurity makes it clear that a refusal of planning permission on grounds of prematurity will not usually be justified, unless the proposal is so substantial, or where the cumulative effect would be so significant, that granting permission could prejudice the development plan. This is a modest proposal, in a highly sustainable location, that would be in accordance with the emerging local plan, had it been adopted in line with the original timescales set out by the council on the Examination in Public.
- 5.3 The current property requires further significant investment and improvements to meet increasing energy efficiency standards for rental and mortgage providers. Given the prefabricated design of the property, its shape, size, and large garden, it is not deemed viable or expedient to do so, hence the proposal.
- 5.4 The site is in a highly sustainable location and would contribute positively to the visual amenities of the surrounding area, whilst helping to sustain a balanced and mixed community, providing smaller scale properties of a size and type more affordable to local people. The proposed development would respect the context of the site and its surroundings, retaining existing landscape features as much as possible and enhancing the visual amenity and biodiversity of the area.