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Your Ref:
Our Ref:

Date: 8th December 2008

Dear Dyanne

Re: Application no: 1/08/21340/F: Change of use of agricultural land to create an extension to allow touring caravans, Bromdon Caravan Park, Wheathill.

Thank you for your consultation on this application. **This proposal is likely to have an adverse effect on the character of this part of the Shropshire Hills AONB, does not represent a sustainable approach to tourism, and is likely to generate proportionately higher levels of traffic than the existing site. The Shropshire Hills AONB Partnership therefore recommends that this application be refused.**

The relevant policy background is as follows (my emphasis in bold throughout).

Planning Policy Statement 7: Sustainable development in rural areas, paragraph 39 states that: *In considering planning policies and development proposals for static holiday and **touring caravan parks** and holiday chalet developments, **planning authorities should:***

- (i) **carefully weigh the objective of providing adequate facilities and sites with the need to protect landscapes** and environmentally sensitive sites, and examine the scope for relocating any existing, visually or environmentally-intrusive sites away from sensitive areas, or for re-location away from sites prone to flooding or coastal erosion;*
- (ii) where appropriate (e.g. in popular holiday areas), set out policies in LDDs on the provision of new holiday and touring caravan sites and chalet developments, and on the expansion and improvement of existing sites and developments (e.g. to improve layouts and provide better landscaping); and*
- (iii) ensure that new or expanded sites are not prominent in the landscape and that any visual intrusion is minimised by effective, high-quality screening.*

The West Midlands Regional Spatial Strategy, Policy QE1: Conserving and Enhancing the Environment states that:

- A. Environmental improvement is a key component of the Spatial Strategy in order to underpin the overall quality of life of all areas and support wider economic and social objectives.*
- B. Local authorities and other agencies in their plans, policies and proposals should:*
 - i) support regeneration, by restoring degraded areas, conserving existing environmental assets, including the reuse of redundant and under-used buildings of merit, and creating new, high quality, built and natural environments, particularly within the MUAs;*
 - ii) **conserve and enhance those areas of the Region, where exceptional qualities should be reinforced by sustainable use and management, including the Peak National Park, the***

five Areas of Outstanding Natural Beauty, the European wildlife sites, and the World Heritage Site (see Environmental Assets Diagram);

iii) protect and where possible enhance other irreplaceable assets and those of a limited or declining quantity, which are of fundamental importance to the Region's overall environmental quality, such as specific wildlife habitats (Annex B), historic landscape features and built heritage, river environments and groundwater aquifers;

iv) protect and enhance the distinctive character of different parts of the Region as recognised by the natural and character areas (Figure 4) and associated local landscape character assessments, and through historic landscape characterisation.

C. In bringing forward development, all agencies and developers should adopt high standards for sustainable natural resource use and management in line with policies such as QE3, QE9, EN1-2 and M3.

The South Shropshire Local Plan, policy E1 (Landscape conservation) states that;

*Proposals for development **will not be permitted which would adversely affect:***

- *The **character** or natural beauty of the Shropshire Hills Area of Outstanding Natural Beauty to achieve the highest level of protection.*
- *the scenic quality and distinctive character of the South Shropshire Landscape outside the Area of Outstanding Natural Beauty;*
- *the character and appearance and setting of the District's historic parks or gardens of special historic or ecological interest.*

In determining planning applications in the countryside the Council will have regard to:

- the suitability of the design, the quality of the proposal and the appropriate use of materials.

The South Shropshire Local Plan, policy ED3; (Tourism Developments) states that:

*Proposals for **sustainable tourism** development will be **permitted provided that:***

- *the proposal would complement the scenic quality and distinctive character of the South Shropshire landscape and within, or adjoining, the Shropshire Hills AONB would respect the natural beauty of that area;*
- ***the development** would be consistent with the conservation of the rural environment and **would not have an adverse effect on the quality of that environment because of its location, size, design or traffic generation.***

Any proposal for an attraction which, by its nature, would depend upon large visitor numbers should be located where it is accessible by a choice of means of transport. Caravan sites should be located near to settlements with facilities for tourists.

The existing caravan site at Bromfield, although very well screened at close quarters, is already visually prominent when seen from a distance. It is of a scale and design that we would be unlikely to support were it a current planning application. In such cases, Planning Policy Statement 7 suggests that Local Authorities should consider the scope for re-locating existing environmentally-intrusive sites away from sensitive areas. Whilst this may not be feasible and the proposed extension is unlikely to significantly increase the visual impact of the site, any activity which increases the use of this already large site is likely to have an adverse effect on the overall **character** of this part of the AONB.

The policy background is also clear that sustainable tourism is supported in AONBs. This proposal does not appear to fit with the principles of sustainable tourism as outlined in the Draft Shropshire Hills AONB Management Plan 2009-2014 (currently out to consultation). Policy 10 states that:

The siting, design and specification of new developments for tourism and recreation should be to high standards of environmental sensitivity and sustainability. The following guidelines are recommended:

- *Single developments of more than around ten accommodation units are less likely to be supported in small settlements and open countryside*
- *Large parks of static caravans, cabins or chalets are likely to be intrusive. Smaller sites with good landscaping are preferable and facilities for touring caravans and camping generally have a low impact as there are fewer permanent structures.*
- *Built facilities for recreation should only be allowed where their location and the activities they support are compatible with the special qualities of the AONB.*

The supporting information for this proposal gives no indication of the numbers of units the extension is expected to provide for. However, it is probably safe to assume that this will be in excess of ten units. The use of the site by touring caravans is likely to generate proportionately more traffic than the existing use as a static caravan park. This is contrary to policy ED3 of the South Shropshire Local Plan.

Please do not hesitate to contact me (Mon- Weds as above) if you have any queries.

Yours sincerely

Joy Tetsill
Planning and Policy Officer
For the Shropshire Hills AONB Partnership