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Our Ref: ph_080219_preferred sites

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Dear Joy

Local Plan Partial Review – Preferred Sites consultation

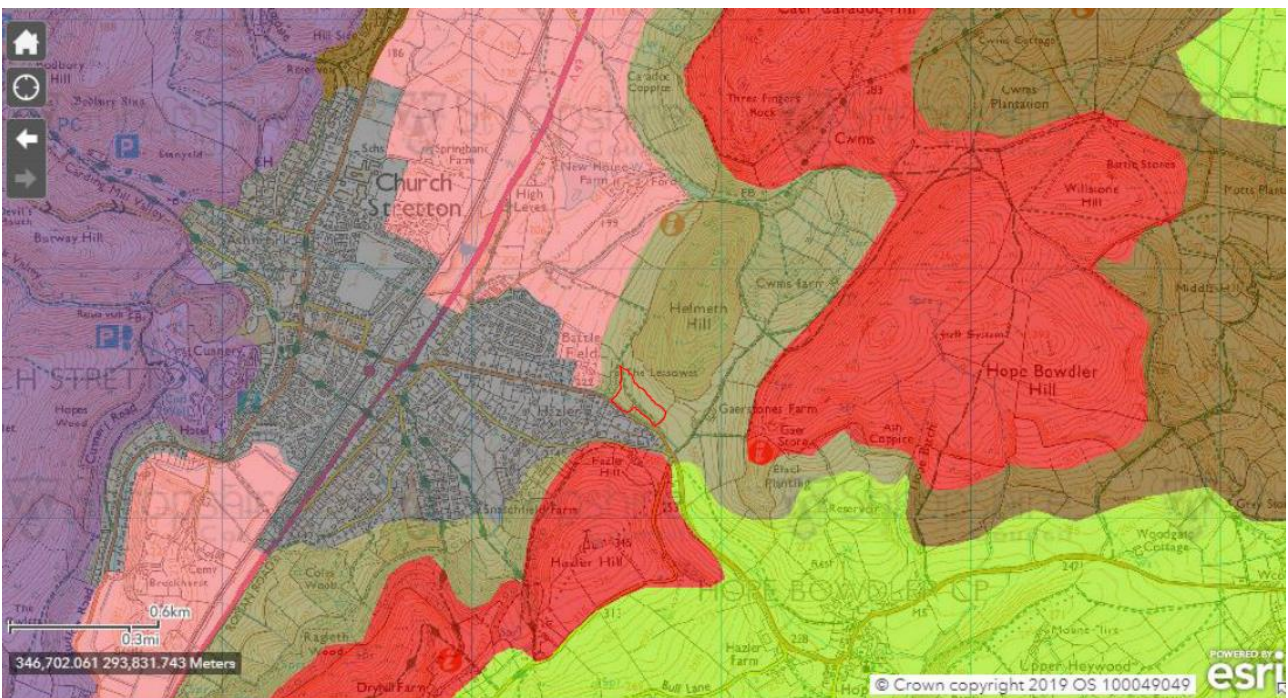
The AONB Partnership is a Joint Advisory Committee established by Shropshire Council with other parties specifically to advise in relation to the AONB and its purposes. This response has been discussed with members of the AONB Partnership local to the relevant area. Our comments on this consultation are confined to the proposed allocation of two housing sites at Church Stretton, and for the reasons outlined below, **the AONB Partnership objects to the allocation of both these two sites.**

CST020 Gaerstone site

In the Landscape and Visual Sensitivity Assessment, parcel 10CST-D has 'high' sensitivity. The map on p17 however shows the Gaerstone site not shaded for higher visual sensitivity. We disagree with this. The label on this diagram which is tagged to the west side of the valley "Development is best avoided on higher landform upon plateaus and valley sides" is equally applicable to the Gaerstone site. Indeed from parts of the valley this is a skyline location, which is the most prominent kind of site. It is logical that this higher sensitivity extends around all of the undeveloped higher land above the eastern side of the town, as indicated by the wording. The assessment makes reference to intervisibility across the valley with parcel E, but under-represents the significance of views from the slopes of the Long Mynd, which is one of the most visited locations in the AONB and therefore a highly sensitive receptor. Indeed the narrow sector exactly where the Gaerstone site is located is visible in framed views from Cardingmill Valley, the most significant honeypot visitor site in the Shropshire Hills. As the only relatively distant view from this valley, and providing an undeveloped scene leading up on to the hills to the east, this adds considerably to the experience of relative wildness so close to the town which is a defining feature of Cardingmill Valley. The key to the design guidance diagram includes a red star labelled "Visitor destination where the setting should be considered", but oddly this symbol is not used on the map. It would certainly be appropriate to the Long Mynd and Cardingmill Valley, and the view out of the valley is one which should be protected. The labels in the assessment diagram which elsewhere refer to proximity to ancient woodland are also equally applicable to the Gaerstone site, due to its proximity to Helmeth Wood. Collectively, the assessment underplays the sensitivity of this site.



View from Plush Hill on the Long Mynd (a very popular visitor location) showing the Gaerstone site (CST020) with very high visibility on the ridgetop location (skyline from slightly lower angles).



The Landscape Character Assessment typology (extract above) shows clearly that the Gaerstone site CST020 (edged in red) is within the 'Pasture Hills' landscape type (paler brown shading), which is currently undeveloped throughout its extent along the eastern side of the Stretton Valley. This reinforces the case that this location is of a different character to the lower areas where development is found, and too high up the sides of the valley for allocation of housing.

At the top of Sandford Avenue heading east, the transition from the town into a very high quality open landscape and hills is very sudden, and the track north through Gaerstone Farm is a very popular and important route into the hills for walkers. This is therefore a sensitive receptor also close to the east of the site.

CST021 Snatchfields site

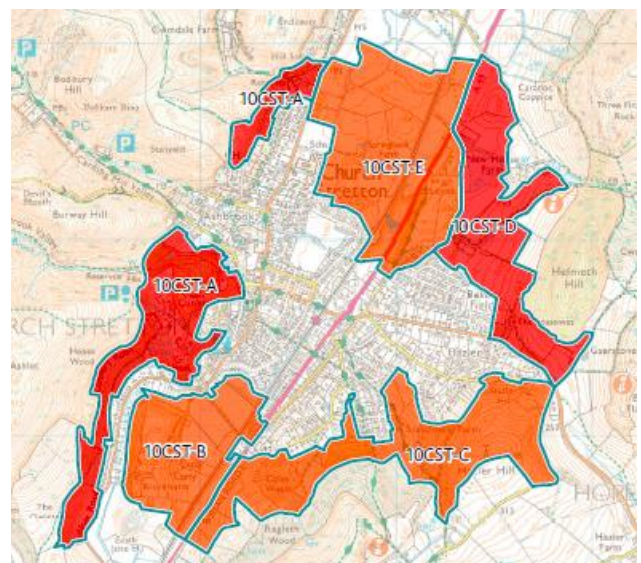
The Snatchfields site is lower than Gaerstone and more integrated with the town, but is nevertheless of high visual sensitivity as the land provides a valuable section of green open space within the development boundary, and linking strongly to the hillside above. The site also has ancient field patterns, and will be difficult to access for housing.



View from Plush Hill showing Snatchfields (R) and Gaerstone (L) sites, both of high visibility.

As stated in our response to the previous consultation, it may not be possible to deliver the housing numbers allocated to Church Stretton without unacceptable impact on the AONB, and if so, the numbers should be re-examined and reduced. National planning policy gives the highest standards of protection to AONBs, and the numbers from a mathematical exercise should not drive harmful and therefore unsustainable development. In allocating sites for Church Stretton which will be classified as 'major development', the Council must address the NPPF presumption against major development in the AONB, and satisfy the three stringent tests of 'exceptional circumstances', which has not been done. With so many alternative locations within the county, and the obvious environmental constraints, our view is that the tests cannot be met for these two sites.

We believe that significant housing numbers for Church Stretton can be delivered, without the need to develop any land classified as of high sensitivity for housing in compartments 10CST-D and 10CST-A (in red opposite). This would include the use of smaller sites, which we



believe have potential in the town to deliver significant numbers of houses. A further advantage of smaller sites is that existing tree cover will help to soften these. Mature trees within the developed area are a significant feature of the town as clearly seen in the photographs above, and contribute significantly to its integration into the landscape. One of the problems with larger greenfield sites which are currently open pasture fields is that they do not have tree cover and so any new development within them would remain very stark and visible for a long period.

Yours sincerely

Phil Holden
Shropshire Hills AONB Partnership Manager