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Your Ref:
Our Ref: ph_070509_Bromdon caravan obj

7 May 2009

Dear Dyanne

Application Ref 09/00195/FUL: Change of use of agricultural land to provide 25 additional caravan pitches; vehicular access and parking facilities, Bromdon Caravan Park, Wheathill.

Thank you for your consultation on this application. **The AONB Partnership considers that this proposal would add to the impacts of a development which is already of a greatly inappropriate scale for its location within the Shropshire Hills AONB, and therefore strongly 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 Shropshire Hills AONB Management Plan 2009-2014 (formally approved by the Interim Executive for Shropshire Council on 19 March 2009) sets out the need for a sustainable approach to tourism in the AONB. AONB Partnership Position 2 in the Plan *states "An approach of smaller, low-key tourism developments designed in sympathy with local character will blend better into the area and spread economic benefits more widely than larger facilities. Tourism businesses will be supported to take a sustainable approach and encourage their visitors to do likewise."*

Policy 10 in the Management Plan (which is formally a Shropshire Council policy) states "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.***

This policy links with current local authority planning policies South Shropshire Local Plan - policy E1, Shrewsbury & Atcham Borough Local Plan - policy LNC9, Bridgnorth District Local Plan – policy B4 and Telford & Wrekin Core Strategy – Policy CS 12.”

The range of impacts the proposed development would have on the special qualities of the AONB result mainly from exacerbating the effects of the existing large scale caravan site. These impacts include:

- Traffic impacts. Visitors to the site are very likely to be completely dependent on car transport for reaching the site and for their travels while visiting the area. The sustainable approach to tourism which the statutory AONB Management Plan advocates would support tourism developments which enable visitors to make greater use of public transport. The site is located in a relatively remote area of countryside, and the access roads to it especially from the south are very small. The large size of the splay at the site entrance is a clear indication that the site's scale is out of keeping with the location and scale of the access roads. We understand further that the licence for the site extends to a large proportion of the year, and that this may enable people to use the site effectively as a living base including commuting to work.
- Visual prominence. The existing caravan site, although very well screened at close quarters, is already visually prominent when seen from a distance. Visual factors are significant in people's experience of tranquillity, one of the defined special qualities of the AONB.
- Light pollution. While design measures can mitigate this, it to a large extent unavoidable with a larger scale site. This is also an important factor in tranquillity, and local people have raised this as an issue with us.
- Infrastructure and potential water impacts. We do not have knowledge of the drainage arrangements for the site, but would have concerns that increasing the scale of the site may result in negative impacts on the water environment.

We would contend that development of the existing site should be seeking to reduce its environmental impact rather than enlarge it. Please do not hesitate to contact me if you have any queries.

Yours sincerely

Phil Holden
AONB Partnership Manager
For the Shropshire Hills AONB Partnership