

Grahame French  
Shropshire Council  
The Gateway  
The Auction Yard  
CRAVEN ARMS  
SY7 9BW

Your Ref: 15/01276/FUL  
Our Ref: ph\_020615\_15\_01276 Ch Stretton housing

2 June 2015

Dear Grahame

**15/01276/FUL Erection of 47 dwellings and garaging; formation of estate roads; reformation of existing school vehicular access and adjoining service road; formation of 10-bay coach park and overspill car park; highway alterations; erection of changing rooms and clubhouse; relocation of two sports fields and formation of multi-use games area; formation of sports pitches; formation of children's play area; and formation of grassed terraced amphitheatre, Proposed Development Land to the East of Shrewsbury Road, Church Stretton, Shropshire**

### The Shropshire Hills AONB Partnership objects to this application.

We do not believe the design and quality of the proposed development meets the requirements set out in the Council's SAMDev pre-submission Plan:

*The AONB designation means that the highest and most sensitive design standards will be sought for all forms of new development in Church Stretton to minimise any adverse effects on landscape character and visual amenity in line with Policies CS6, MD2, MD12 and MD13.*

We are aware that the principle of housing development on this site is being determined through the SAMDev process, and consistent with our earlier consultation responses, we believe that some development on this site is preferable to that at New House Farm east of the A49. However, the rugby field site is far from ideal, and detailed proposals need to meet the necessary design standards and environmental conditions, which the current application does not do. The site is prominent in the approach to Church Stretton from All Stretton, and is situated on an easy and well used walking route out of the town offering remarkable views to the east from a roadside location. It is also directly adjacent to the northern part of the Church Stretton Conservation Area across Shrewsbury Road. We endorse the detailed comments made by Church Stretton Town Council regarding design and the proposed development, and feel these matters need to be addressed fully before planning permission is given.

We notice that many of the public comments in support of the application refer only to the value of the proposed sports facilities, while making no reference to the housing. 47 houses is a substantial development, whose implications need to be considered fully. We consider the Council should deem this a 'major development' and consequently should apply the tests of exceptional circumstances in para 116 of NPPF. We note also that Sport England are not currently satisfied to support the sport proposals. These facilities in particular need sensitively to address minimising light pollution and minimising hard surfacing in respect of water run-off. The design of the proposed sports club house also needs to reflect a high sensitivity of design for a rural setting, as do the access roads, for which the use of roundabouts seems unnecessary and overly urban in style.

We note that the Inspector's current proposed modifications to the SAMDev Plan include reference to flood risk at this site, amending the development guidelines to read:  
*CSTR018 - "Development must be carefully designed to take account of a specific Flood Risk Assessment to determine the developable area of the site and groundwater Source Protection Zones (SPZ) 1 and 2, in consultation with the Environment Agency..."*

We note that the Environment Agency have objected to the application on grounds that these issues have not been adequately addressed.

The following policies, amongst others, are highly pertinent to this application:

National Planning Policy Framework para 116.

Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.

Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated

Shropshire Core Strategy Policy CS17: Environmental Networks states:

*Development will identify, protect, enhance, expand and connect Shropshire's environmental assets, to create a multifunctional network of natural and historic resources. This will be achieved by ensuring that all development:*

- *Protects and enhances the diversity, high quality and local character of Shropshire's natural, built and historic environment, and does not adversely affect the visual, ecological, heritage or recreational values and functions of these assets, their immediate surroundings or their connecting corridors. Further guidance will be provided in SPDs concerning the natural and built environment;*
- *Contributes to local distinctiveness, having regard to the quality of Shropshire's environment, including landscape, biodiversity and heritage assets, such as the Shropshire Hills AONB, the Meres and Mosses and the World Heritage Sites at Pontcysyllte Aqueduct and Canal and Ironbridge Gorge.*

Shropshire Council SAMDev Policy MD12: The Natural Environment states:

*In accordance with Policies CS6, CS17 and through applying the guidance in the Natural Environment SPD, the conservation, enhancement and restoration of Shropshire's natural assets will be achieved by:*

*1. Ensuring that the social or economic benefits of development can be demonstrated to clearly outweigh the harm to natural assets where proposals are likely to have an unavoidable significant adverse effect, directly, indirectly or cumulatively, on any of the following:*

- i. the special qualities of the Shropshire Hills AONB;*
- ii. locally designated biodiversity and geological sites;*
- iii. priority species;*
- iv. priority habitats*
- v. important woodlands, trees and hedges;*
- vi. ecological networks*
- vii. geological assets;*
- viii. visual amenity;*
- ix. landscape character and local distinctiveness.*

Shropshire Hills AONB Management Plan policy for Housing and Design of Development states:

*The design of all housing (market priced and affordable) should demonstrate sensitivity to the special qualities of the AONB.*

*Where affordable housing is allowed when other forms of development would not be, in order to meet social need, the standards of sensitivity to the AONB should not be compromised, and are expected to be higher than outside the AONB. Such cases need to include a rigorous assessment of identified local housing need and consideration of the capacity of the landscape to accommodate development without undermining the purposes of designation. Development should not contribute to the loss of irreplaceable habitats or established ancient trees.*

*All development should integrate well into the historic pattern and character of the surrounding built environment and landscape. Building style should reflect local tradition, and designs should be of a high standard in keeping with the nationally designated landscape. In line with Core Strategy policy CS6, particular regard should be paid to village and town design statements and Conservation Area Appraisals. Inappropriate design, layout and materials should be avoided. Innovative sustainable schemes are to be encouraged where they take account of the surrounding vernacular and the use of local materials.*

*Where possible, locally-occurring building materials should be used. Roofing materials should be in keeping with those used in nearby buildings, with no bright coloured tiles or reflective surfaces. The use of photovoltaic tiles matching existing and surrounding roof colours should be encouraged. External lighting on new developments should be kept to a minimum and use down-lighting to reduce light pollution.*

Yours sincerely

Phil Holden  
AONB Partnership Manager