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Development Management
Shropshire Council
Shirehall
Shrewsbury
SY2 6ND

Your Ref: 14/04374/OUT
Our Ref: gc_130215_objection NHF 14_04374_OUT

13 February 2015

Dear Mr French

14/04374/OUT Outline application (access, landscaping, layout) for erection of 85 dwellings and use of land for the siting of 16 holiday units, Proposed Development Land North and East of Cwms Lane, Church Stretton

This response is in addition to the earlier response from the AONB Partnership, and relates to the new documents provided by the developer and extended consultation on these.

Summary

The Shropshire Hills AONB Partnership wishes to re-state its strong objection to this application. The new information provided does not overcome the fundamental issues we have raised regarding the suitability of this development within the AONB. The Landscape Strategy and proposed mitigation measures do not make this development acceptable.

We note that a revision accepted in the SAMDev inquiry to policy MD3 on housing adds in to this a specific reference having regard to policy CS5. Policy CS5 Countryside and Green Belt states:

“New development will be strictly controlled in accordance with national planning policies protecting the countryside and Green Belt.”

Explanation to Policy CS5 Countryside and Green Belt, para 4.72 (extract) states

“whilst this policy seeks to facilitate a wide range of beneficial rural development, the operation of this policy, in conjunction with Policy CS6 and more detailed policies in the SAMDev DPD, recognises the need to consider the scale and design of proposals, where development is most appropriately sited, environmental and other impacts. There will be a significant emphasis on achieving quality and sustainability of design, particularly locally appropriate design and use of materials. Thus, proposals which would result in isolated, sporadic, out of scale, badly designed or otherwise unacceptable development, or which may either individually or cumulatively erode the character of the countryside, will not be acceptable. Whilst these considerations will apply generally, there will be areas where development will need to pay particular regard to landscape character, biodiversity or other environmental considerations including in the Shropshire Hills Area of Outstanding Natural Beauty.” (emphasis added)

We re-state that through removing the site from the SAMDev Plan, the Council has already accepted that Church Stretton’s housing needs can be met on other sites. The development does not therefore pass the test of exceptional circumstances in NPPF para 116 on meeting the need in other ways. Aside from the many other arguments against it (outlined in our earlier letter), we believe the development for this reason alone cannot be granted permission. The application also fails to meet the third test on NPPF para 116, in that the environmental effects are highly significant, and not moderated by the landscaping proposals.

We understand that the applicant has now accepted that the field edge public footpath alongside the sunken lane cannot in fact be 'diverted' into the sunken lane. Therefore the argument used in the documents that walkers heading from the town to Caer Caradoc will be unaware of the houses due to screening effect of the deep lane is invalid and must be disregarded. This has been given considerable weight in the applicant's documents. The housing development would indeed be highly intrusive to users of this highly popular hill from the town.

The selective quoting of the AONB Management Plan in the applicant's documents ignores the fundamental fact that this is the biggest single development proposal to affect the AONB in many years, in a location of extreme sensitivity for landscape character and quality. **This development does not support the vision of the AONB Management Plan.** The first priority in the Management Plan with regard to the Stretton Valley, Wenlock Edge and Dales area states:

"The need to retain character and limit the negative impacts of change and development is probably more acute here than anywhere else in the AONB."

The 3-d modelling in the 'Landscape Strategy' may serve to depict landform, but it does very little to assess the actual landscape impacts of the development. **The analysis presented is not compliant with the nationally accepted 'Guidelines for Landscape and Visual Impact Assessment' (GVLIA, 2013).** Regarding assessment of landscape impact (as distinct from visual impact), the Chapter 5 summary points of the Guidelines include:

- *To identify and describe the landscape effects the components of the landscape that are likely to be affected by the scheme, often referred to as the 'landscape receptors', should be identified and interactions between them and the different components if the development considered, covering all types of effect required by the Regulations.*
- *The landscape effects must be assessed to determine their significance, based on the principles described in Chapter 3. Judging the significance of landscape effects requires methodical consideration of each effect that has been identified, its magnitude and the sensitivity of the landscape receptor identified.*
- *To draw final conclusions about significance the separate judgements about sensitivity and magnitude need to be combined into different categories of significance, following the principles set out in chapter 3.*
- *The rationale for the overall judgement must be clear, demonstrating how the judgements about the landscape receptor and the effect have been linked in determining overall significance.*
- *A clear step by step process of making judgements should allow the identification of significant effects to be as transparent as possible, provided that the effects are identified and described accurately, the basis of the judgements at each stage is explained and the effects are clearly reported, with good text to explain them and summary tables to support the text.*

Once again, we urge the Council to reject this poor development proposal.

Yours sincerely

George Chancellor
Chair