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Shropshire Council
Shirehall
Shrewsbury
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Your Ref: 14/04374/OUT
Our Ref: gc_251114_objection NHF 14_04374_OUT

25 November 2014

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 detailed response is in addition to the standard response from the AONB Partnership already posted to the Council planning website.

Summary

The Shropshire Hills AONB Partnership strongly objects to this application. This is a major development in an iconic and sensitive part of the AONB. The site has been removed from housing and employment land allocations in the SAMDev Plan, so the applicant's quoting of earlier, superseded stages of SAMDev in support of the application are not relevant. The site was in any case only included in earlier stages of SAMDev because alternative land was not then available, which is no longer the case. 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 (some of which are outlined below), 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.

The site and the development

Though contiguous with existing housing at the north-east edge of Church Stretton, this development would extend the town almost half a mile further northwards into countryside of exceptional quality. The views across to Caer Caradoc from the south-west are some of the most iconic in Shropshire, and very frequently used in tourism marketing and promotion for the Shropshire Hills and the county in general, and would be permanently compromised by the development. Caer Caradoc is a hill of exceptional character, and very popular both with walkers and as part of the backdrop for more general sightseers. Its wild and rugged feel belies its relatively small stature and accessibility, but this means that the hill's immediate setting, separated as it is from the town by countryside, is crucial to its quality. As well as fundamentally harming the setting of the hill in general, the development would also spoil what is the most direct walking route between Caer Caradoc and Church Stretton, through very attractive countryside, much of which would become a housing estate. Moving the public footpath into the sunken lane would not change the fact that this feature would be surrounded by housing – immediate visibility is not the only issue in landscape character. However, moving the footpath is not in any case a viable option as the sunken lane itself is already a right of way (an Unclassified County Road), and extinguishing the additional field-edge path would be a loss of amenity, in addition to the undesirability of improving the surface in the sunken lane which would encourage off-road vehicle use.

Caer Caradoc has a hillfort, which as an important heritage feature would be harmed by the effect on its setting (contrary to NPPF para 132 see below). Helmeth Hill is also adversely affected, notably the permissive footpath on its western perimeter overlooking New House Farm. As well as its great intrinsic value to people, the quality of the AONB landscape, and that of the Stretton Hills in particular in relation to Church Stretton, is of crucial importance for attracting visitors who support the local economy. The wide extent of public opposition to the application is clear evidence of both of these factors.

The amendments made by the applicants to the proposals since the scheme was published at the time of the SAMDev Revised Preferred Options do not change the fundamentals of the development, and do not make it acceptable with regard to the AONB designation. The accompanying 'Landscape Strategy' claims to 'assimilate' the development into the surrounding area and the AONB. It fails however to do this, since the fundamental change in landscape character resulting from the addition of large numbers of houses and chalets is not in any sense offset by landscaping and planting. These impacts mean that the third test of NPPF para 116 is not met.

A need to improve visitor facilities to reduce pressure on Carding Mill Valley is claimed as a support for the tourism part of the application, however new chalets will not achieve this, and the proposed new footpaths do not in any way offset the harm to the landscape and public amenity resulting from the development. The proposed holiday accommodation units do not, as part of this overall application, at all represent the sustainable approach to tourism outlined in the approved Sustainable Tourism Strategy for the Shropshire Hills and Ludlow, which identifies maintaining the quality of the landscape as a key objective (see below). The number of chalets proposed is also not compliant with the AONB Management Plan policies on tourism development (see below).

Policy

The Shropshire Hills AONB Partnership considers that the proposed development does not comply with the following sections of the National Planning Policy Framework:

115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.

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*

132. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

We consider the application does not comply with the following sections of the adopted Shropshire Core Strategy:

CS5 Countryside and Green Belt

In the open countryside, new development will be strictly controlled in accordance with national planning policies protecting the countryside and Green Belt from inappropriate development.

CS17: Environmental Networks

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*

We consider the applications does not comply with the following sections of the Shropshire Site Allocations and Management of Development (SAMDev) Plan, Draft Development Management Policies:

Policy context (extract)

The statutory Shropshire Hills AONB Management Plan contains a number of policies adopted by Shropshire Council and has therefore been a key document influencing the preparation of the SAMDev policies. Whilst stressing the importance of the countryside as a whole, the SAMDev policies emphasise the importance of the AONB and the need to conserve and enhance its character and distinctiveness and have regard where appropriate to the requirements of the AONB Management Plan.

Draft Policy MD2 Sustainable Design, Explanation (extract)

For development affecting the Shropshire Hills AONB, particular regard should be paid to the Shropshire Hills AONB Management Plan and supplementary guidance.

Draft Policy MD7 – Managing Development in the Countryside (extract)

Further to Core Strategy Policy CS5,

1. Development in the countryside should:

i. Protect and respect heritage and natural assets and be in accordance with the requirements of: Policy MD2 (Sustainable Design); Policy MD12 (Natural & Historic Environment); Adopted Natural and Historic Environment SPDs and, where appropriate, the AONB Management Plan;

MD11 - Tourism facilities and visitor accommodation (extract)

1. Tourism, leisure and recreation development proposals that demonstrate they require a countryside location in accordance with MD7 will be permitted where the proposal complements the character and qualities of the site's immediate surroundings, adds to the Shropshire offer, does not adversely impact on the wider tranquillity of the area and meets the requirements in Policies CS5, CS16, MD7, MD12 and relevant local and national guidance. Proposals within and adjoining the Shropshire Hills AONB should pay particular regard to landscape impact and mitigation.

Explanation to MD11 (extract)

2. In areas of recognised scenic and environmental value proposals must pay particular regard to the qualities of the area and the reasons for designation in line with Policies CS6 and CS17, MD12 and the NPPF. Within and adjoining the Shropshire Hills Area of Outstanding Natural Beauty applicants should also have regard to guidance in the Shropshire Hills AONB Management Plan.

Sustainable tourism development plays a vital role in supporting the local economy but must be sensitive to the qualities of the AONB.

MD12 – Natural and Historic Environment

1. Shropshire Council will require new development proposals to conserve, enhance and restore Shropshire’s natural and heritage assets and landscape character in order to support the delivery of CS6 and CS17. Internationally and nationally important habitats, sites of wildlife conservation and geological interest and legally protected species will be afforded the highest level of protection in accordance with the relevant legislation and policy. Great weight will also be accorded to conserving and enhancing the natural beauty of the Shropshire Hills AONB having regard to the AONB Management Plan. Heritage assets will be safeguarded in accordance with their significance.

2. Development proposals which are likely to have a significant adverse effect, directly, indirectly or cumulatively, on any of the following assets:

I. the special qualities of the Shropshire Hills AONB;

II. locally designated sites;

III. priority species;

IV. priority habitats

V. valued woodlands, trees and hedges;

VI. designated heritage assets and non-designated heritage assets of demonstrably equivalent significance;

VII. geological assets;

VIII. visual amenity;

IX. the landscape character and local distinctiveness of the area in which the proposal is located.

will be rejected unless:

i. the social or economic benefits of the development proposal can be demonstrated to clearly outweigh the harm to the assets; and

ii. there is no satisfactory alternative means of delivering the proposal

We further consider that the proposals do not comply with the following Shropshire Council Policies within the statutory Shropshire Hills AONB Management Plan 2014-19:

Valuing the AONB in Planning and Decisions – Management Plan Policies

Protection of the AONB

In line with national and local authority planning policies, the AONB has the highest standards of protection for landscape and natural beauty and the purposes of designation should be given great weight in planning decisions, also taking into account the statutory AONB Management Plan.

Consideration of the purposes of designation in all decisions affecting the AONB should reflect sustainability and the full range of special qualities defined in the Management Plan as well as landscape character and visual amenity. Exceptionally where a significant adverse impact associated with development cannot be avoided, appropriate mitigation measures including habitat creation or community benefits, should be sought.

Housing and Design of Development – Management Plan Policies

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.

Tourism and recreation development and infrastructure – Management Plan Policies

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 10 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, as are facilities for touring caravans and camping which generally have a low impact by virtue of 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.

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.

Finally, we consider the application does not comply with the following objective from the Strategy and Action Plan for Sustainable Tourism in the Shropshire Hills & Ludlow (approved by Shropshire Council):

2.1 Give priority to maintaining a high quality landscape and environment as a primary resource of sustainable tourism. [emphasis added]

Planning history relating to the site

We urge the Council to consider carefully the relevance of the previous application for housing rejected by South Shropshire District Council in 1990, and that for caravan development for which an appeal was dismissed in 1994.

Conclusion

As stated in our responses to the earlier SAMDev proposed allocation of this site, we believe this would be the single most harmful development to affect the Shropshire Hills AONB in many years, and we urge in the strongest terms that for the sound policy reasons set out above, it be rejected.

Yours sincerely

George Chancellor
Chair