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Your Ref: 14/05773/OUT
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Dear Emily

14/05773/OUT Outline application for residential development for up to 12 no. dwellings to include means of access , Land Off Cemetery Road, Church Stretton, Shropshire

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

The Shropshire Hills AONB Partnership objects to this application. This is a poor site for housing development, which would compromise a valuable greenfield area beyond the town boundary where amenity and tranquillity are particularly important, and is not adequately safe from flood risk. We believe this site is not necessary for the delivery of required housing numbers for Church Stretton, and that alternative preferable windfall sites are available. Our comments are set out in greater detail below.

Inadequate consideration of the AONB

The Design and Access Statement states that the reserved matters of design, landscaping, etc will be done to a high standard and be policy compliant. There is however no mention of the AONB designation here, or of the statutory AONB Management Plan, nor indeed of the Church Stretton Town Design Statement, which provides an excellent source regarding these matters.

Similarly in the policy analysis section, the Statement makes no reference to NPPF and Shropshire Council policies for the AONB, which afford the highest levels of protection, nor to the AONB Management Plan. These relevant policies are set out below:

Para 14 of the National Planning Policy Framework on the 'golden thread' of sustainable development, **highlights AONBs through footnote 9 as an exception to a presumption in favour of development, as one of a few types of special area where "specific policies in this Framework indicate development should be restricted."**

Para 115 of the National Planning Policy Framework states that:

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. (emphasis added)

If the application were to be deemed 'major development', then NPPF para 116 would also apply.

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. (emphasis added)*

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. (emphasis added)**

Shropshire Hills AONB Management Plan 2014-19 (as approved by Shropshire Council) Policy for Protection of the AONB states:

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.

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. (emphasis added)

Commentary to NPPF and Shropshire Council policies quoted above:

The 'wetlands' site is an important part of the landscape and environmental network of the Church Stretton area, just as the surrounding hills are, though perhaps less well understood and not as highly valued due to perceptions. The proposed development would sit uncomfortably alongside and within this site, and would detract from this asset rather than enhance it as required by policy CS17. The development would comprise a block of housing physically separated from the current built envelope of the town and intruding into the surrounding countryside.

Landscape, amenity and tranquillity value of the site

Though land along Cemetery Road has clearly been more intensively used in the past, this is now a very tranquil and beautiful natural area, and distinctly outside the town itself. In particular the siting of the proposed houses very close to the cemetery itself would change the character and outlook from this important place, where many people clearly go for quiet contemplation, and where consequently the high quality landscape setting is extremely valuable. This is borne out by other public comments. The adjacent wetlands area is a valuable area of habitat and high quality open space on the edge of the town, the setting of which would be harmed by the proposed development.

Flood risk

The maps provided may indicate that the proposed site is not actually within a designated flood zone, but it is bounded very closely on two sides by flood zone land, and the level of elevation above currently standing water appears to be minimal. On account of climate change, recent advice from the Environment Agency is to treat Flood Zone 2 as if it were Flood Zone 3 for the purposes of land use planning. Zone 2 flood risk land (which can be regarded as Zone 3 – a high level of risk) lies just metres away from the proposed development, and also affects the access road leading to the site. Indeed the Church Stretton Surface Water Management Plan (<https://www.shropshire.gov.uk/media/182721/church-stretton-SWMP.pdf>) actually has a picture of flooding on Cemetery Road on the approach to the development site on its cover. If the houses were built, it is quite likely that protection works for them might be deemed necessary in future, which would be likely to have a detrimental displacing effect on water levels and management elsewhere. Future uses of the land proposed for this development should instead seek enhance its environmental value and reduce flood risk.

Proposed benefits to the wetlands

The Statement makes much reference to the development delivering some of the Town Council's aspirations for the wetlands site and flood alleviation. However, the actual improvements proposed do not include any improvements on the road access itself (only a pedestrian causeway adjacent to the road is proposed), and neither do they in fact propose any habitat enhancement works on the wetlands themselves (proposing only improvements to the public footpath). The Town Council's stated ambitions for the area included potential development at the very south edge of the wetlands site to replace the current sheds, which this proposal does not achieve.

While the AONB Partnership is indeed supportive of realising greater ecological and public benefits from the wetlands area, we would contend that the wetlands should be valued more highly as they are, and that major schemes of enhancement are not really needed, and certainly should not provide justification for this development on an inherently unsuitable site. The detailed hydro-ecological feasibility study of 2012 concluded that significant open water creation or modification of drainage levels was not advisable, and recommended only that a couple of modest ponds and scrapes could be created, though avoiding harm to existing marshy grassland habitat. The proposed development site, being relatively low value semi-improved grassland but adjacent to high value habitat, in itself offers potential for valuable habitat creation to enhance the wider area ecologically and for flood risk management, rather than being built on.

Yours sincerely

Phil Holden
AONB Partnership Manager