

Mr Andy Mortimer
Planning Policy
Shropshire Council
Shirehall
Shrewsbury
SY2 6ND

Direct Line: 01952 507449
Email: george.chancellor@lineone.net
Your Ref:
Our Ref: gc_14 Aug 13_SC Planning policy

14 August 2013

Dear Mr Mortimer

Site Allocations & Management of Development (SAMDev) Revised Preferred Options consultation for Church Stretton

At its July meeting the Shropshire Hills AONB Partnership considered the Revised Preferred Options consultation document for Church Stretton and the proposed site allocations, and voted unanimously to **object to the proposed allocation of sites CSTR027 and ELR070 and the associated proposed tourism and sporting developments.**

While understanding the need to accommodate some housing development in Church Stretton, members expressed serious concerns about the scale of the proposed housing site CSTR027 and its visual prominence in relation to iconic hills of the AONB – especially in relation to how high up the slope the site goes. Concerns were also raised about the distance of the proposed employment land site ELR070 from the current edge of the town, spreading development northwards up the valley well into current countryside. This site is in very close proximity to and overlooked by the very popular hills of Caer Caradoc (with an important hillfort monument) and Hazler, as well as very prominent in views from the Long Mynd a short distance to the west. The proposed development of larger detached houses in the upper part of CSTR027 raised particular concerns, including that such houses would not contribute to local affordable housing need while having a significant visual impact. The addition of several extra elements of development to justify the expense of the new access road was seen by members as creating an unacceptable scale of development overall, and the road if constructed would very likely bring yet further development to this part of the valley in future. It was felt that the opportunism of a specific development proposal has overtaken the supposedly strategic process of allocating sites, at the expense of the nationally important landscape which is of huge economic importance to both Church Stretton and Shropshire as a whole.

The Landscape and Visual Impact Assessment report published by Morris Property does not include the employment land site ELR070, nor the Archery Centre. The employment site was also not included in a Landscape Sensitivity and Capacity study undertaken in 2007 for the District Councils in support of future site allocations. We are unclear why this site is being proposed when there is apparently no such assessment of it in the public domain. All the more so since its overall impact would be greater than the proposed housing site given the nature of the buildings involved and its distance from the built-up area of the town.

The published LVIA report does however concede that CSTR027 *'would have a significant visual impact on... users of popular recreational footpaths, and on the setting of Caer Caradoc and Helmeth Hill'*, and acknowledges that the impact of the elevated upper half of the housing site is greater. Notwithstanding our overall position, we suggest that if the housing site were to go ahead there is a strong case that its size and impact should be reduced by limiting development to the lower part of the site.

Our extensive involvement with tourism matters (including a lead role in the Shropshire Hills & Ludlow Destination Development Partnership) leads us to conclude that the proposal for a visitor centre appears to have little or no value. Feasibility work in support of the Tourism Strategies for Church Stretton and the Shropshire Hills has established a clear priority to improve visitor information facilities in the town centre of Church Stretton, for ease of use, promotion of public transport and in order to optimise economic returns to the town from visitors. Creating a visitor centre out of town at this location could undermine the economic benefit to traders within the town, while mixing this public facility with private rented accommodation is far from ideal, and the business model is unclear. With public sector cuts affecting some existing visitor centres in the area, the creation of a new centre could also further undermine existing facilities.

The anticipation that the proposed new visitor centre could create traffic and parking levels of 20,000 vehicles per annum or greater to levels equivalent to Cardingmill Valley (Addendum to Traffic Report) raises very serious concerns about the likely impact of such numbers of visitors on the Stretton Hills east of the A49 which, unlike the Long Mynd under National Trust management, are in private ownership with little or no capacity for the management of recreational impacts. The stated benefit of relieving the pressure on Cardingmill Valley would not be achieved by transferring it elsewhere to a location where it cannot be managed. The supporting documents quote the National Trust and Church Stretton Town Council as supporting tourism development east of the A49, but we understand these organisations are in fact clearly opposed to the proposed developments.

We are unclear why a proposal for holiday accommodation is described as supporting the allocation of sites CSTR027 and ELR070, when the SAMDev Revised Preferred Options plan indicates the Tourism Site as 'not allocated'. We consider the proposed large development of 45 log cabins would have an unacceptably high impact, but that a smaller development of up to 10 units could perhaps be accommodated on this site subject to careful design and landscaping. In addition, while finding a new field for the Long Mynd Archers club is a reasonable proposal, this should not be overplayed in support of extensive and essentially unrelated built development. This highly sensitive location may be suitable for low key recreation but we do not believe it is suitable for the development of nationally important sports facilities.

Overall, therefore, the Shropshire Hills AONB Partnership considers that the current proposals do 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*

129. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

We consider the proposals do 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 proposals do 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, and AONB Partnership Positions within the statutory Shropshire Hills AONB Management Plan 2009-14:

POLICY 4 Farm diversification enterprises need to be in harmony with the environment and not degrade this resource, which also provides an important economic asset for the future. The impact of business-related traffic to and from the property will be an important consideration, including cumulative effects.

POLICY 10 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.*

POLICY 37 Promotion of the area for tourism should aim to minimise car travel. Towns and locations best served by public transport should receive the main promotion as 'gateways' to the Shropshire Hills, in preference to locations where access is only possible by car.

AONB PARTNERSHIP POSITION 2 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.

AONB PARTNERSHIP POSITION 5 The model for the economy of the Shropshire Hills should be of environment-led regeneration, in which a pattern of relatively small-scale dispersed enterprise will be key to maintaining the right balance.

Finally, we consider the proposals do 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.

We are concerned that the proposed housing allocation for Church Stretton has been increased apparently to accommodate a developer's aspirations, and this does not appear to meet the NPPF requirement to assess the "scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way". We consider that the earlier proposed housing numbers for Church Stretton could be accommodated in smaller developments minimising intrusion into the AONB. In addition to our objections, we are aware of very extensive opposition from local residents to these proposals in relation to the landscape of the AONB, and strongly urge the Council to reconsider the proposals, and require publication of full information on the landscape, visual and heritage impacts.

Yours sincerely

George Chancellor
Chair