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Your Ref: 14/02338/FUL
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26 June 2014

Dear Heather

14/02338/FUL Change of use of land for the extension of existing secure caravan storage; relocation of existing green steel clad storage shed; ground works and retaining wall with 2m high mesh security fencing above, Wheathill Touring Park, Wheathill, Shropshire

The Shropshire Hills AONB Partnership objects to this application. The AONB Partnership believes the incremental development at this site is intrusive and out of keeping with the character of the area. The storage of caravans is an inherently different activity to providing touring pitches, and one which by its nature has much less benefit to the local economy but meanwhile requires the erection of intrusive fencing and structures and a greater degree of permanence. It is not appropriate in this location within the AONB. The extent of groundworks and highly urbanised style of landscaping used extensively on this site has eroded its rural and historic character, and this development would continue to enlarge what has already become an obtrusive and inappropriate facility. 'Screening' of obtrusive elements with large fences does not make an inappropriate development acceptable. The continued submission of 'small scale' applications, is cumulatively leading to a development which is inappropriately large scale for its location, and the cumulative impact must be taken into account in this decision.

The following national and local policies applicable support the position that this application should be refused:

Para 14 of the National Planning Policy Framework (as quoted by the applicant's agent) 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)

Shropshire Core Strategy Policy CS16: Tourism, Culture and Leisure (extract) states:

To deliver high quality, sustainable tourism, and cultural and leisure development, which enhances the vital role that these sectors play for the local economy, benefits local communities and visitors, and is sensitive to Shropshire's intrinsic natural and built environment qualities, emphasis will be placed on:

- *Supporting new and extended tourism development, and cultural and leisure facilities, that are appropriate to their location, and enhance and protect the existing offer within Shropshire.* (emphasis added)

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 MD11 - Tourism facilities and visitor accommodation states:

1. *Tourism, leisure and recreation development proposals that require a countryside location will be permitted where the proposal complements the character and qualities of the site's immediate surroundings, and meets the requirements in Policies CS5, CS16, MD7, MD12, MD13 and relevant local and national guidance;*
2. *All proposals should to be well screened and sited to mitigate the impact on the visual quality of the area through the use of natural on-site features, site layout and design, and landscaping and planting schemes where appropriate. Proposals within and adjoining the Shropshire Hills AONB should pay particular regard to landscape impact and mitigation.* (emphasis added)

Explanations (extract)

4.108 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, MD13 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 inherent qualities that the AONB is designated for; (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)

AONB Management Plan Policy for Supporting Enjoyment and a Visitor Economy in Harmony with the AONB approved by Shropshire Council states:

Tourism and recreation development and infrastructure

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. (emphasis added)

Yours sincerely

Phil Holden
AONB Partnership Manager