

The first position is in objection to Policy S5 'Church Stretton Plan Area'. It is asserted that a major development site in Church Stretton is not appropriate. The second position is in objection to the proposed allocation of Land at Snatchfields Farm (CST021). If there is to be a major development site in Church Stretton, there are alternative sites within the settlement that are more suitable for the provision of housing.

First Position – Objection to Policy S5
Failure to Conform with National Policy

Draft policy S5 'Church Stretton Plan Area' sets out that the provision of new housing in Church Stretton will partly be delivered through exception development in the AONB where it is consistent with relevant policies of the Local Plan.

The site is located within Shropshire Hills Area of Outstanding Natural (AONB), as does much of the remainder of the Church Stretton Plan Area. Paragraph 11b of the NPPF sets out that Local Planning Authorities should seek to meet their objectively assessed housing needs, amongst other uses, unless protected areas or assets of importance, such as the AONB, make this not possible;

'b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁵, unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁶; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'*

In the AONB, major development requires evidence of exceptional circumstances to justify the development. Paragraph 172 of the National Planning Policy Framework (NPPF) states;

*'Great weight should be given to conserving and enhancing 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 these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads⁵⁴. The scale and extent of development within these designated areas should be limited. **Planning permission should be refused for major development⁵⁵ other than in exceptional circumstances, and where it can be demonstrated***

that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) 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;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.'* [GPS emphasis]

The Council have identified a need for 200 new dwellings in Church Stretton in the period 2016 to 2038. 79 of these are either committed or completed, 51 are to be delivered through windfall sites and the remaining 70 dwellings are proposed at site CST021. There has been no quantitative analysis of the need for housing growth in Church Stretton or for the AONB as a whole. The number of 200 homes for the plan period has been suggested on vague statements about the need to grow Church Stretton as a Key Centre primarily relating to its role on the transport corridor of the A49 and rail links. The overall future of the AONB is not addressed, which, given its protected status, is a major failure of analysis and plan making.

The Shropshire Hills AONB Exceptional Circumstances Statement (July 2020) seeks to provide rationale for the allocation of major residential development in the AONB. The justification provided for the delivery of houses within the AONB is weak and fails to demonstrate exceptional circumstances. In accordance with criterion a) and b) of paragraph 172 of the NPPF, the justification of the need for the development directly within the AONB at Church Stretton is flawed. The Council have failed to provide adequate justification for the need for 200 dwellings in Church Stretton and should be seeking to address the provision of housing outside the AONB unless there is clear evidence that this cannot be achieved. The provision of housing in alternative locations outside Church Stretton and the AONB has not been adequately explored. For example, there is little evidence to support the conclusion that Craven Arms is not able to meet Church Stretton's housing need.

Consequently, policy S5 is in conflict with national policy as insufficient weight has been afforded to conserving and enhancing the AONB and therefore major development should not be allocated in Church Stretton.