

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038

Church Stretton Town Council comments

Page 80 Para 4.91e

The document states

“Church Stretton and Craven Arms as Key Centres within the Shropshire Area of Outstanding Natural Beauty. 4.92. Shropshire Economic Growth Strategy seeks to promote a ‘step change’”

Craven Arms is not in the AONB, so a correction is required here.

Page 184 Para 5.85

Under this section the Town Council requests the inclusion of the heritage assets of Hazler Hill, Ragleth Hill and Ancient Woodland, Helmeth Hill and the Lawley which lie to the east of the A49.

More importantly the Ancient Scheduled Monument of Caer Caradoc multivallate Hill Fort has been omitted from this section of the ‘Explanation’. This should be corrected.

Page 184 Para 5.87

Development on the hillsides should be resisted, as urban creep is producing increased water roll off, exacerbating the flood risk problems on the valley floor.

The Snatchfield site is on the hillside and 70 houses plus surrounding hard standing will add to the existing problems.

Page 183 S5 Church Stretton Plan Area

S5 1

Policy S5.1 sets out the development strategy for Church Stretton. The Town Council notes that this policy will supersede the adopted SAMDev Plan policy S5 as stated in the LPR Appendix 1, Schedules A1 & A2.

S5.1.3

The Development Strategy for Church Stretton comprises two allocated sites and small-scale windfall- sites within the development boundary.

Exception development is mentioned, this is assumed to mean Rural Exception Sites abutting the development boundary for affordable housing in perpetuity. 'Entry level' exception sites are excluded as they are not allowed in an AONB (NPPF Para 71b). The Town Council would support Rural Exception Sites.

S5.1.4 New employment development

The Town Council would support the saved SAMDev allocation (CST038) for start-up businesses. It also believes that the opportunities for home working will continue to increase, following the pandemic. This will be dependent on continued improvement in local Broadband speed and mobile phone coverage which is vital for the promotion of more local employment opportunities.

It is accepted that any additional small-scale employment development will be provided through windfall.

Schedule S5.1 (i) Site allocation – Land at Snatchfields Farm (CST021)

Background

Areas of Outstanding Natural Beauty have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. The Shropshire Hills AONB has a specific statutory purpose which is to conserve and enhance the natural beauty of the area, and Shropshire Council must take this into account when considering allocating development.

This is echoed in the CROW Act 2000 where it says, "...in exercising or performing any function in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."

The NPPF in paragraph 172 states that, "The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development, other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest." It also emphasises the importance of conserving and enhancing the landscapes and scenic beauty. It is of particular note that AONBs are considered unlikely to be suitable for accommodating unmet needs from adjoining areas. It therefore follows that decisions on allocating sites in the Local Plan should be 'landscape led', including taking account of the wider landscape context.

Church Stretton is the only market town within the AONB which is required to take new major development. As the only such town in Shropshire within a nationally protected landscape, the scale and design of development needs to be of a higher quality and more sensitive to the surrounding countryside, and sites chosen with care.

The Shropshire Council has accepted that the proposed Snatchfield Farm allocation for 70 dwellings would be regarded as a 'major development' which the NPPF states should be refused other than in exceptional circumstances and where it is in the public interest. It has issued an 'Exceptional Circumstances' statement on 'Proposed Allocations that are considered Major Development in the Shropshire Hills AONB'. In this document the Council presents its case that Snatchfield Farm does meet the three tests as set out in paragraph 172 of the NPPF.

The three tests used to demonstrate that major development in an AONB is in the public interest.

The first test relates to the need for the development and its impact on the local economy. By its very nature, a major housing development would cause some harm to the purposes for which the AONB was designated. It follows then that the Council should provide conclusive evidence which relates directly to housing need arising in the AONB, in this case, Church Stretton, and cannot seek to include a contribution to meeting the need in the county outside the designated area.

The Council claims that the main rationale for the Snatchfield Farm allocation is that it is required directly to meet the town's needs and to support its role as a Key Centre by contributing to its long term sustainability and meeting its economic and social needs. The Town Council is not aware of any housing needs figure having been established for Church Stretton by Shropshire Council, as opposed to a more general target for Shropshire.

In respect of the economy and support for local services, the Town Council accepts that there may be some limited benefit to local shops from the population increase but the scale would be insufficient to assist the quality of other services. For example, 70 dwellings would amount to about 154 persons which would only serve to place a greater strain on the capacity of local medical, welfare and education facilities as well as parking provision, rather than improve them.

The proposal would provide 14 affordable houses on the site but this number could be provided elsewhere through a rural exception site or other smaller less intrusive sites.

The Town Council appreciates that if it is accepted that the Shropshire Council's housing target for Church Stretton is to be achieved, then new sites for limited additional housing would be required. However, as it is argued later, additional housing can be provided on more appropriate sites behind Church Stretton school, namely CST019 and CST035.

The second test concerns the scope for developing outside the designated AONB area. The Shropshire Council has looked at Shrewsbury and Craven Arms. Shrewsbury is seen as unsuitable, being 14 miles away and the centre for countywide services. There are many large developments being progressed in Shrewsbury and 70 dwellings could easily be subsumed into some of those.

Craven Arms is a Key Centre 8 miles away, which the Council claims operates independently of Church Stretton and which has no new allocated sites. The Shropshire Council concludes that there is, 'very limited scope' for developing outside the designated area.

The Town Council considers that Craven Arms could have been investigated further to take more housing, as crucially it falls outside the AONB and has easy access to Church Stretton by car, bus and rail.

As well as developing outside the designated area, the test also states that the scope for 'meeting the need in some other way' should be explored. There is no evidence the Council has done this. For example it is interesting that the Council points out in 4.15 of its Exceptional Circumstances Statement, that unlike other Place Plans, the Church Stretton area has no hubs & clusters, so this places an increased emphasis on the town to accommodate housing which might otherwise have been shared over the wider Place Plan area. There are a number of settlements in that area which would have met the criteria to become hubs or clusters and take some limited housing but the Shropshire Council has failed to overrule the reluctance of the parishes to contribute, so leaving Church Stretton to bear the brunt of development. This point is also made in the AONB Management Plan (page37).

Another preferable prospect for development instead of Snatchfield Farm, lies in the number of small sites around the edge of the town which could be developed as cross-subsidy or rural exception sites. This idea has been discussed with Shropshire Council but it is not known to what extent, if any, it has been followed up.

The third test relates to any detrimental effects on the environment, landscape and recreation and ways of moderating such effects. Shropshire Council contends that it has carried out appropriate assessments, looking at the landscape, wildlife sites, woodland and heritage factors and flood risks. This has resulted in them finding that Snatchfield Farm is the most appropriate for housing when considering all available sites in terms of landscape sensitivity and visual amenity sensitivity to housing. Also, no unmanageable constraints have been found in relation to ecology, heritage, trees, public protection, or highways, which would prevent allocation. Shropshire Council also acknowledges that the Jack Mytton Way long- distance path runs through the site, the allocation guidelines specify its retention with suitable buffering and improvement, in line with NPPF paragraph 98. Buffering of mature trees on the site boundary would also be required.

The test is not whether Snatchfield Farm is the least harmful site when compared with others but whether it is or is not harmful in itself.

It is accepted that the site is surrounded on three sides by development, which downgrades its sensitivity to some extent, however the Jack Mytton Way which crosses the site is particularly important to visitors and the community at large, as it offers a fine vista of the hills to the north-west across the valley as well as an attractive panorama of the wooded hills rising to the south. The character and amenity of this recreation feature, which is popular with walking groups, would undoubtedly be adversely affected by the erection of a housing estate.

Although the site's sensitivity rating is less than the 'high' rated land to the west of the valley and the Battlefield/ New House Farm areas in the Shropshire LVSS assessment (Gillespies 2018), both the landscape and visual sensitivity are still rated as 'medium- high'.

Development within this environment would appear as a distinctly noticeable new component in the landscape and result in a readily perceived detrimental change to the existing setting. This is a particularly important consideration in the nationally recognised landscape of the Shropshire Hills AONB. The visibility of a new development should also be considered. The Snatchfield Farm site is particularly visible from surrounding viewpoints such as Hazler Hill, Gough's Coppice, Caer Caradoc and Burway Hill.

The historic importance of the site also needs to be considered. Few visual signs now remain of the open field once farmed by the community but using laser scanning facilities the linear feature of a medieval track way crossing from the east to the west of the site, can be seen. It appears to have been a route from the town, through the hills to Hope Bowdler. The Town Council believes that the development of this site would be harmful, as it is the last remaining unimproved medieval meadow in Church Stretton. It is an unspoilt area of open countryside that lies in the setting of the heritage asset, Ragleth Hill.

The importance of the site as a non- designated heritage asset also needs to be considered as a material consideration (NPPF para 197).

In 2012 the Shropshire Council Assessment for this site (Stage 2b) quoted from the South Shropshire Landscape Sensitivity and Capacity Mapping report that, "the site helps to alleviate the linear nature of the settlement edge in a prominent location. The area has very limited capacity for housing, as this would fill in the green wedge which is a major positive feature of the settlement."

The site also forms part of a wildlife corridor which contains a diversity of wildlife, in part due to its proximity to two ancient woodlands. There are mature trees along parts of the boundaries of the site, including a fine row of oaks on the southern boundary.

The Town Council believes that given the existence of the long distance footpath and the natural beauty of the southern setting of the site, together with its contribution as a 'verdant lung' for the town, any development on the Snatchfield Farm site would be harmful to the primary aim of preserving and enhancing the AONB landscape.

This major development in the AONB would therefore not be in the public interest as the three tests have not been met.

Flood risks

There has been some concern expressed about potential flooding affecting the site and it has been the subject of a strategic flood risk assessment for Shropshire Council. There is a watercourse running from the south-east corner northward which leaves the site by the Bridleways. There is no known flood risk from a particular flood zone/event and the site does not fall within Flood Zone 2 & 3. However, it appears that the watercourse has not been modelled due to its small catchment, so the fluvial risk is unknown and possible run-off could be rapid.

There is a surface water flow path across the site which appears to relate to the watercourse along its eastern side. The site falls away steeply to the east and into the northern corner so there could be vulnerability to flooding from surface water run-off from the higher ground surrounding the site. The Shropshire Council statement suggests that the risk of flooding would not affect more than 5% of the site over a hundred- year period, at a maximum depth of 0.3m. This depth of any flooding would appear unlikely to cause problems for pedestrians or emergency vehicles. The Town Council concludes that there would be no overriding flooding risk and the plan for any development could steer housing away from the areas of fluvial flood risk and surface water flow route, possibly preserving those areas as open landscape or developing as a wetland feature. The layout could also ensure that there was no increase in surface water flooding off -site and keep run-off attenuation to the greenfield rate. Flood risk management techniques such as retention ponds could be utilised on site.

Traffic

In respect of traffic and highways matters, Shropshire Council has issued a Transport Statement (WSP June 2020). The report appears to lack objective analysis and contains suspect base material. In this report it states that there have been no collisions in the vicinity of the site in the last 5 years, specifically on the roads leading to the site.

It appears that there are about 120 dwellings in the residential locality associated with Snatchfields, with a number of, as yet unimplemented permissions. With the proposed 70 homes, the total would rise to about 200 dwellings. It is noted that a 5.5m wide carriageway is regarded as capable of serving 200 dwellings according to Shropshire Council's 'Specification for Estate Roads (2000)'. Chelmick Drive and Ragleth Road have only 4.8m wide carriageways. The Snatchfield Farm development would have to utilise these existing residential access roads rather than any proper distributor road in order to reach the A49. The Shropshire Council report consistently claims that the traffic increase will be well below the capacity of the local roads but nowhere does it reveal what those capacities actually are, which seems to undermine the case being made. It also fails to fully examine the traffic and amenity environment which would be created, and the potential conflicts between traffic and those on foot. There is concern relating to the last stretch of Clive Avenue, which takes all the traffic from the residential area into a sloping section which is about 5m wide with no footway, leading down to Watling Street. This would lead to pedestrian/vehicular conflict on occasions.

Some account must be taken of the fact that there are some, albeit far from ideal, alternative routes for those on foot, using very narrow paths linking Ragleth Road and Chelmick Drive with the Jack Mytton Way and an additional path, just past the Donkey Patch leading down to Watling Street.

With regard to accessibility of the site from the town on foot, most of the route can use footways, apart from the lower section of Clive Avenue which has none. Shropshire Council indicates, using Jack Mytton Way, that it is a distance of 830m to the Sandford Avenue

shops, 1.15km to the Surgery and about 1.6km to the schools from the Snatchfield Farm site.

For planning purposes, the 'Manual for Streets' regards 800m as providing a comfortable walking distance and a 20 minute (1.6km) walk as acceptable in a suitable environment. Apart from the potential difficulties using part of Clive Avenue, and the steep gradient, there is the negotiating of the A49, although the latter does provide a signalled pedestrian crossing. The walking distances, taking into account the environment, fall just below the acceptable standard.

The distance to schools is considered too great for access on foot and there being no public transport, would lead to an increased use of cars, which goes against Shropshire Council's climate change strategy.

For these reasons, the Town Council believes that CST019 should be considered again in place of CST021 which it believes to be totally unsuitable for the reasons previously stated.

Conclusions

Shropshire Council's conclusion on whether the Snatchfield Farm allocation is in the public interest after applying the tests, is that it would directly meet the needs of Church Stretton as a Key Centre and there is insufficient scope to meet those needs elsewhere and there are no significant environmental constraints. The Council says that the site would contribute to the long-term economic and social sustainability of the town.

It should be noted that in the Review of Preferred Sites Consultation (Atkins May 2019) only 9% of unique respondents agreed with the allocation of the Snatchfield Farm site and only 11% agreed with the overall preferred housing and employment guidelines for the town. This suggests there is very little public support for the allocation, nor is there agreement with the Shropshire Council's strategy for Church Stretton.

The Town Council's conclusion is that major development on the Snatchfield Farm site in the AONB would not be in the public interest for the following reasons-

The three tests used to demonstrate that major development in an AONB is in the public interest have not been met

The Shropshire Council has not provided enough substantial and specific evidence to justify the allocation of the Snatchfield Farm site in the public interest.

The scale of the development would not be sufficient to greatly contribute to the role of Church Stretton as a Key Centre, nor have the housing needs of the town been clearly specified.

The Council has also failed to fully investigate other ways of meeting the perceived housing need.

The Council has not fully investigated smaller sites as proposed by the Town Council, along with other acceptable sites which were originally proposed in SAMDev and which are still available.

With regard to the detrimental impact on the environment in the AONB, Shropshire Council has not produced a full Landscape and Visual Appraisal for the site, so conflicting with Policy DP26.3c of the Section 18 submission Draft Plan, nor has it carried out an ecology study or a heritage assessment.

The overall sustainability of the site is rated as 'Fair'.

The Council has failed to show how 'great weight' was given to the conservation and enhancement of the landscape and scenic beauty of the locality in accordance with NPPF paragraph 172.

Alternative sites

Because of the local topography of Church Stretton and the issues relating to areas of the valley floor being in a flood plain, the number of suitable alternative sites is limited.

The Town Council has been speaking to Shropshire Council over the last few years expressing a desire for development to be brought forward on smaller sites around the town, as this is preferable in the AONB. This was not considered achievable by officers and that larger sites were preferred. This was confirmed with the proposal of CST021 in the Draft Local Plan, in spite of previous objections to the Snatchfields Farm site.

During the SAMDev Plan discussions, the Shropshire Council, in its SAMDev Preferred Options Draft of February 2012, suggested that CSTR014 (CST019), a site behind Church Stretton School, would be suitable for development after 2016 for up to a maximum of 110 dwellings. It noted that there were, "no significant constraints" and that, "the community supports development on this site." It was also noted that the overall sustainability of the site was 'good'. For these reasons, the Town Council believes that CST019 should be considered again for up to 50 dwellings, in place of CST021 which it believes to be totally unsuitable for the reasons previously stated.

CST035, a site abutting Springbank Farm to the north, had previously been put forward for residential development by Shropshire Council and the site was considered 'good' as far as overall sustainability was concerned. The Town Council would support development of this site for up to 20 dwellings.

To provide the sizeable amount of affordable housing required, (indicated by the Town Council's Housing Needs Survey results), site CST004, south of Continental Fires, is proposed as a rural exception site to provide affordable housing in perpetuity.

Policies Map Inset S5 Church Stretton Place Plan

This map shows the development boundary for Church Stretton. Anything outside that boundary is regarded as open countryside. However, in the main, although the boundary is drawn tightly around the existing built up area, it excludes some parts of the town, such as Ley Gardens. Street Meadow and Leasowes Close, for no apparent good reason. The Town Council request that this is corrected. In addition, any new sites agreed as part of this consultation should be included in the development boundary.

Policies

Page 32 Policy SP9 Managing Development in the Countryside

Section 4a of this policy allows for housing exception sites which comply with various policies but it does not mention Policy DP26 which relates to the AONB. DP4 (Affordable exception sites) and DP7 (Cross-subsidy exception sites) allow for local needs exception sites around key centres such as Church Stretton. It must therefore be made clear that this case applies in Church Stretton, even though the town is within the AONB.

Page 55 DP1 Residential Mix

The Town Council carried out a Housing Needs Survey (HNS) in conjunction with Maria Howell and Tim Shrosbree of Shropshire Council. Prior to any site being developed the Town Council would suggest that, as laid down in the NPPF (Para 128), early discussion between applicants, the local planning authority and the local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. This also includes looking at the results of the HNS to ensure the required mix of housing and tenure is addressed.

The need for specialist housing designed to meet the diverse needs of an ageing population which is living longer, is important, especially in Church Stretton.

Page 78 DP9 Strategic Corridors

Strategic corridors are referred to as areas for 'primary focus for major development'. In the case of Church Stretton this is the A49 corridor.

3c promotes large greenfield windfall sites for employment and other land adjoining the key centre. In the AONB, such sites would still have to pass the exceptional circumstances tests. However, greater emphasis might be placed on the employment benefits rather than protection of the AONB. The Town Council believes that the text should make specific reference to the Stretton gap and make it clear that the natural beauty of the AONB will take priority over anything else.

Page 102 DP 17 Landscaping of New Development

Church Stretton is known for its tree coverage. Over recent years more and more planning applications have been received for trees to be felled. Replanting of trees is vital, every time a tree is removed a new one should be planted, always remembering “Right tree Right place”.

Boundary treatment is important in conservation areas and in the AONB. Green landscaping as opposed to 6’ closeboard fencing in a rural setting is important not only for its visual qualities but also for creating a feeling of wellbeing.

Page 128 DP26 Shropshire Hills AONB

This policy is the most important in relation to Church Stretton, Little Stretton and All Stretton, where the majority of the development lies in Conservation Areas. The whole parish lies in a particularly sensitive area of the AONB, surrounded as it is, to the west and east by many heritage assets some of which are designated.

Appropriate development in the AONB is necessary for the economic and social wellbeing of those who work and live there. However, it is important for the planning system to protect the qualities which people value about the area, and some forms of development which may be appropriate elsewhere should be controlled in the AONB.

The Town Council has some concerns about the policy explanation in paragraphs 4.227 to 4.237.

Paragraph 4.230 implies that development which causes some harm might be acceptable and paragraph 4.235 merely says development, “likely to have a significantly negative effect” will be “very carefully considered.” This seems to imply that some negative effect is acceptable in the AONB.

The Town Council considers that more emphasis should be given to seeking protection and enhancement of the area, rather than appearing to accept a degree of harm. This is stated in NPPF para 172 where it says, “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.”

Policy DP26 has two main implications. First, it says ‘minor’ development will be resisted. This could be a problem for obtaining certain development such as infill housing in the town itself. It also seems to conflict with S5.1.3 where it says, new residential development will be delivered through, “...small-scale windfall development within the Church Stretton development boundary..” The Town Council asks that this position be clarified. Second, the policy does not rule out ‘major’ development which may be allowed in exceptional circumstances. These include the need for the development, the cost of, and scope for developing outside the designated area, or meeting the need for it in some other way and any detrimental effect on the environment, the landscape and recreation.

The Snatchfield Farm, proposed site, represents a major development in the AONB and as such is subject to the tests for 'exceptional circumstances' (NPPF Para 172). These are addressed in our submission on Schedule S5.1 (i) Site allocation – Land at Snatchfields Farm.

25.9.2020