

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.

## **Second Position – Objection to the proposed allocation of Land at Snatchfields Farm (CST021)**

### Site Specific Objections

The site is located within Shropshire Hills Area of Outstanding Natural (AONB), as does much of the remainder of the Church Stretton Plan Area. In accordance with paragraph 172 of the National Planning Policy Framework (NPPF), major development in the AONB requires evidence of exceptional circumstances to justify the development.

The provision of 70 dwellings on the site would result in landscape and visual harm to the AONB. The site is a high value landscape and includes the Jack Mytton Way footpath which runs directly through the site and makes an important contribution to the enjoyment of the area. The site has panoramic views across the valley and any development of the site would result in loss or erosion to the landscape.

The view of the existing development surrounding the site from the hills are characterised by low density housing and trees. The provision of 70 dwellings on the site would be of significantly higher density and would therefore interrupt the built form, causing harm to the landscape.

The Shropshire Hills AONB Exceptional Circumstances Statement (July 2020) seeks to provide rationale for the allocation of Land at Snatchfields Farm as a major development site. The Council have failed to provide adequate justification of the exceptional circumstances for a large development site in the AONB.

The Council's justification in regards to the third criterion of paragraph 172 of the NPPF is flawed. The explanation provided sets out that site CST021 is considered suitable because the Shropshire Landscape and Visual Sensitivity Study (LVSS) shows that the site has medium-high landscape sensitivity and medium-high visual amenity sensitivity for housing, which is the lowest rating for the landscape parcels to the east of the A49. This is insufficient and unreasonable justification for proposing major development on the land which has medium-high visual amenity sensitivity, even if it has the lowest rating in the immediate area. It would be more accurate to consider landscape impact for sites throughout Church Stretton, including those to the west of the A49, closer to the town centre and essential amenities. It is therefore asserted that the proposed allocation of this site

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is in conflict with national policy as insufficient weight has been afforded to conserving and enhancing the AONB.

Additionally, the site is limited by marshy ground in the north-eastern part of the site which is unlikely to be suitable for development. Furthermore, in order to manage the surface water run-off from the proposed development and the hills surrounding the site, a sustainable drainage solution is expected to be in the form of a large swale and water attenuation system which will result in a large area of undevelopable land on the site. The significant gradient of the site will also make the development of the land unsustainable and expensive. If 70 dwellings were to be achieved it would be at a density atypical and at odds with the surrounding development.

There are a large number of mature trees along the site boundaries and some within the site. The root protection areas of these will prevent development along the boundaries and some areas within the site. The existing pastoral fields and surrounding woodland provide for a wildlife corridor and therefore it is anticipated that the site has various priority habitats and species which are required to be protected and conserved.

Even if the site specific constraints do not entirely prevent development on the site, it would significantly reduce the viability of the site and the number of houses that could be provided on the site. The site is therefore unlikely to assist the Council in meeting the identified need in the area, and importantly, will result in the provision of less affordable housing than set out in policy DP3 of the draft Regulation 18 Local Plan. The provision of affordable housing is a key priority for Shropshire Council to meet the need in the district; however it is clear that this site is unlikely to significantly assist in achieving this. Furthermore, the access to the site is steep and despite the Council indicating that it would have the potential to provide over 50 dwellings, the location and topography of the site would not be suitable for the provision of specialist housing designed to meet the diverse needs of older people or those with disabilities and special needs in accordance with policy DP1 of the draft Regulation 18 Local Plan.

Despite the conclusions of the Transport Statement prepared by WSP on behalf of Shropshire Council, local residents remain concerned of the impact that the development of the site would have on the existing highways network and road safety.

The first position is that major development in Church Stretton is not appropriate, but if there is evidence to show a major development must be located within Church Stretton, it is clear that site CST021 is not suitable for a major development.

An alternative site within Church Stretton previously identified in the SAMDev as School Playing Fields (CSTR018) for the provision of up to 50 dwellings has now been deleted and no longer forms part of the Local Plan. It is understood that the site has been removed due to site constraints preventing the site being developed. However, there is another site within Church Stretton that has previously been considered by Shropshire Council known as land adjacent to Church Stretton School (CSTR014) for a maximum of 110 dwellings. This site is more sustainably located to the town centre where services and amenities can be accessed and has level access, making it more suitable for the

provision of housing suitable for older people or those with disabilities and specialist housing. It is understood that this site could be developed for housing or retained as a school playing field, depending on the nature of development on land adjacent to Church Stretton School (CSTR018). As site CSTR018 is no longer considered developable, site CSTR014 should be considered as it is assessed to be more suitable for the provision of housing to meet the local need than the land at Snatchfields Farm.

The second position is that the allocation of land at Snatchfields Farm should therefore be removed from the draft Local Plan and other alternative sites explored further.

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