

Head of Local Plans and Regeneration  
Bridgnorth District Council  
Westgate  
Bridgnorth  
Shropshire  
WV16 5AA

Direct Line: 01588 674085  
Email: Joy.tetsill@shropshire-cc.gov.uk  
Your Ref:  
Our Ref:

Date: 27<sup>th</sup> November 2007

Dear Sir

**Re: Bridgnorth Core Strategy: Issues and Options Consultation**

Please find enclosed the response to the above from the Shropshire Hills Area of Outstanding Natural Beauty Partnership.

I can be contacted as above (Mon-Weds) if you have any queries.

Yours sincerely

Joy Tetsill  
Planning and Policy Officer

## Response from the Shropshire Hills AONB Partnership to Bridgnorth Core Strategy Issues and Options Consultation

### Question 2: Strategic Objectives.

Objective 6, '*To conserve and enhance the District's biodiversity and natural assets and improve local environmental quality*' appears to focus primarily on biodiversity and does not set a clear direction for more detailed policies on different aspects of the natural environment. Bridgnorth's natural assets are one of its strengths, with the AONB designation playing an important role. In this respect, landscape is about the interaction between many elements and the strategic objectives need to reflect this more. The suggested re-wording is '*To conserve and enhance the District's natural and cultural assets, including landscape character, biodiversity, geodiversity and the historic environment and to improve environmental quality*'.

### Question 3: Distribution of Growth.

The adopted District Local Plan (July 2006) established a strategy that sought to encourage most new development in the main towns and larger villages in the District, with development to meet local needs only in a number of smaller villages. There is a general presumption against new development in the open countryside and green belt. Option 1, '*Retention of existing Local Plan settlement strategy and proportions of growth*' would provide the most balance between development in the District and within the AONB. The Partnership has taken the view in the past that some careful growth is needed in smaller rural settlements to maintain their social and economic viability and this option provides for this. In addition, the Local Plan was adopted in July 2006 and this approach to growth has been recently tested and approved.

### Question 4: Prioritisation of greenfield and brownfield land.

Option 2 '*Give priority to development of brownfield land in individual settlements and only allow greenfield development in that settlement when all brownfield land has been developed*' would provide opportunities for development within the smaller settlements in the AONB (in line with the comments in 2.7 above). However, it needs to be qualified to ensure that any such development respects local character and is of a size and scale appropriate to the existing settlement. It is recommended that the following be added to the end of the existing option *....subject to criteria on size, scale and design*'. Such criteria could then be developed as part of more a more detailed site allocations or development control document.

### Question 7: Delivering housing in rural settlements.

One of the concerns about exception sites for housing has been that the current situation does not allow for some of the same controls over location which apply to allocated sites. This raises the possibility that an exception site could have an adverse effect on the AONB. Option 2 '*As option 1 (In rural areas continue to rely on exception sites in settlements where there is at least a minimum level of services) but also allocate sites solely for affordable housing in rural settlements*' removes this concern and so should be supported.

Question 7 asks also about the criteria used to allocate sites if option 2 is favoured. The District Council recently consulted on a draft Supplementary Planning Guidance for affordable housing. The AONB Partnership response to this was very supportive of the proposal to use a parish based housing needs assessment as a means to identifying local housing need. This proposal should be retained in the development of any criteria.

It is also suggested that any criteria be based on the landscape sensitivity and capacity mapping exercise currently being completed by Bridgnorth District Council in partnership with the AONB and South and North Shropshire District Councils.

**Question 8: Criteria for Gypsy and Traveller Sites.**

AONB and SSSI designations recognise the national significance of an area's landscape or nature conservation value and it is suggested they are at least as important as Green Belt designation. It is recommended that the criteria reflect this by the adopting the following wording '*Sites in the Green Belt and Sites in areas with national designations e.g. Area of Outstanding Natural Beauty, SSSIs should be avoided unless it can be demonstrated that there are no other suitable alternative sites.*' Following this, the same criteria as for exception sites (see 2.9 and 2.10 above) should apply.

**Question 10: Location of employment sites.**

Option 2 '*Small areas of employment land within settlements and near to existing industries to support starter businesses and small-scale expansion of local firms*' is favoured. The economic viability of communities within the AONB (one of the secondary purposes of AONB designation) is linked to employment opportunities and suitable sites for rural businesses should be available. However, the landscape of the Shropshire Hills also relies on land based industries continuing to manage the countryside in ways which sustain it. It is suggested that when more detailed policies are developed, this option be qualified by the addition of the following criteria: '*Within the Shropshire Hills AONB those businesses which are actively involved in maintaining the landscape will be favoured.*'

**Question 12: Criteria for identifying land suitable for employment use.**

Employment sites should be identified in similar ways to housing sites.

**Question 14: Rural diversification.**

Option 1 '*Emphasis on tourism developments, which are consistent with environmental objectives including local sourcing and supply*' could be expanded to provide a lead for other rural enterprises, not just tourism. The maintenance of the special qualities of the AONB depends on a viable rural economy. There are many current initiatives and good ideas which use the environmental capital of the land as a basis for new business. Such innovative approaches should be encouraged and supported. The suggested re-wording is '*Emphasis on tourism developments and support for those environmental initiatives which are consistent with maintaining landscape character, including local sourcing and supply*'. Such a wording would then allow for the development of more detailed policies in later Development Plan Documents which;

- support and facilitate on-site farm shops which sell produce both from that farm and other locally produced goods, not necessarily food.
- promote and support sustainable tourism based on the environmental assets of the area - particularly that which is farm based or utilises practices which in themselves conserve and enhance the landscape
- promote and support businesses based on environmental technologies – biomass and bio-fuel production and the renewable energy sector for example.

**Question 20: Design.**

Option 2 '*Encourage good design based on principles of PPS1 and best practice with guidelines for specific settlements*' is preferred as this provides a good opportunity for the conservation and enhancement of the distinctive character of settlements within the AONB. The Core Strategy should set the foundation for this and the mechanism for delivery could be via town or village design statements, or through the Parish Plan process. Adoption of such documents as Supplementary Planning Guidance is an ideal outcome but it is recognised that the present planning system makes this difficult to achieve.

**Question 23: Historic environment.**

The first option '*The enhancement and protection of the historic environment as a high priority in the Core Strategy/LDF*' is supported. The historic environment is a key element in the AONB landscape (and the District as a whole) and the Core Strategy should reflect this. The repetition of

national strategy could be avoided if the option were expanded so that it provides for guidelines on local distinctiveness for individual sites, areas, or features along the lines of option 2 in question 20 (above). The option would then read '*The enhancement and protection of the historic environment as a key priority in the Core Strategy with statements of local distinctiveness for specific areas, sites or features.*'

**Question 24: Protection of the natural environment.**

This is the key issue for the conservation and enhancement of the AONB within the Core Strategy and it is important to achieve the right approach. All of the current options appear to be based on a rather narrow consideration of sites of biodiversity interest. The Core Strategy needs to address the whole of the natural and cultural environment and provide a framework within which more detailed policies - including those for the AONB - can be based. The following wording is suggested '*Protect, conserve and enhance areas or sites designated for their landscape, biodiversity, geological or cultural importance and seek to identify or create new sites or areas of local value, including through the development control process.*'