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Your Ref: TP/SA/04  
Our Ref:

Date: 29<sup>th</sup> August 2007

Dear Sir/Madam

**Re: Core Strategy Sustainability Appraisal, Scoping Report**

Thank you for your consultation on the above. The response from the Shropshire Hills AONB Partnership is attached.

The District Council is to be commended on a thorough and well thought out process for the Sustainability Appraisal. This is clearly and logically presented.

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

Yours sincerely

Joy Tetsill  
Planning and Policy Officer

**Shropshire Hills AONB Partnership:  
Response to Bridgnorth Scoping Report for Core Strategy Sustainability Appraisal.**

This response addresses the consultation questions posed on page 3 of the Scoping Report.

**Q1. In light of the scope of the Core Strategy DPD, are there any additional relevant strategies, plans, programmes or other policy documents that should be taken into account?**

**A1.** No

**Q2. Have the key messages from the review of relevant strategies, plans, programmes and other policy documents been correctly identified? If not, which additional key messages should be addressed?**

**A2.** The aims of the Shropshire Hills AONB Management Plan are well represented in appendix 3. However, the **purposes** of designation of the AONB –namely the conservation and enhancement of natural beauty (with special regard to agriculture and forestry) and the promotion of sustainable forms of social and economic development – should be included here, to provide the context for these aims and a platform for a more robust consideration of the AONB through the Sustainability Appraisal process.

This amendment should then be carried forward into the definition of the key sustainability issue for the Shropshire Hills AONB in the table on page 4 of Topic Paper 9: Landscape. Here, the existing wording should be changed from 'the quality and character of the Shropshire Hills AONB should *be maintained*' to 'the quality and character of the Shropshire Hills AONB should be **conserved and enhanced**'.

**Q3. Are there any other key sources of data or information that are missing? If so, please provide the data source.**

**A3.** There is no data missing

**Q4. Are you aware of any inaccuracies in the baseline data shown in the report? If so, please provide the correct data.**

**A5.** There are no inaccuracies

**Q5. Do you agree with the key sustainability issues for the Bridgnorth Core Strategy DPD that have been identified? Are there any key sustainability issues that are missing, or that need amending?**

**A5.** See the answer to question 7 (below) for some suggested amendments to the key sustainability issues with respect to the Shropshire Hills AONB.

**Q6. Has the influence of the Core Strategy DPD on the sustainability issues been appropriately described? If not, please suggest how the Core Strategy DPD may help to address the sustainability issues.**

**A6.** The influence is appropriately described.

**Q7. Are the sustainability objectives and appraisal questions in the SA Framework appropriate? Are there any objectives that are missing, or that need amending?**

**A7.** The key sustainability issues with respect to the Shropshire Hills AONB, appraisal question E2 and the supporting reasoning, should be amended.

AONBs are the nation's finest landscapes and Section 85 of the Countryside and Rights of Way Act 2000 states that "in exercising or performing any functions in relation to, or so as to affect, land" in these areas, (AONBs) relevant authorities "**shall have regard**" (my emphasis) to their purposes. In addition, PPS 7 (paragraph 21) states that 'Areas of Outstanding Beauty have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty of the landscape and countryside should therefore be given **great weight** (my emphasis) in planning policies and development control decisions in these areas.'

These points are recognised in the key messages section of Topic Paper 9: Landscape which states on page 4, in bullet point 4 that '*LDF policies should have particular regard for areas statutorily designated for their landscape.*' The current good situation in this respect is recognised in column 2 which states that '*.... little or no development is expected to occur in the AONB .... due to current planning policies to protect it.*' However, the analysis in column 3, that the Core Strategy does not have a high level of influence on the AONB because only a small proportion of the AONB is in Bridgnorth, does not follow. The extracts in my paragraph above show that it is very important that the Core Strategy sets the policy framework for the AONB, regardless of how much of the designated area is within the District.

The comments in the final column of the table in Topic Paper 9 on the implications for the Core Strategy are supported, although such a detailed policy is more likely to be included in subsequent LDDs. However, the inclusion of such a policy is unlikely to be possible unless the Core Strategy provides a strong and clear foundation at the outset. The potential influence of the Core Strategy on the Shropshire Hills AONB should thus be changed from '*medium*' to '*high*'. This, and the change in wording from '*maintenance*' to '*conservation and enhancement*' (answer 2 above) will then carry forward into paragraph 4.39 (the Key Issues section) of the Scoping Report which should be amended appropriately.

Sustainability Objective E in Table 5.1 of the Scoping Report, '*Protect **and enhance the natural, built and historic environment of Bridgnorth District***' is supported, but appraisal question E2 should be amended to read '*Conserve or enhance landscape character and local distinctiveness, paying particular attention to the protection of designated landscapes such as the Shropshire Hills AONB and taking into account the effects of climate change.*' This would then allow Appendix 3, (the detailed review of strategies, plans and programmes etc.) to be amended where it considers the Shropshire Hills AONB Management Plan. The final column would then read '*the need to conserve and enhance the Shropshire Hills AONB is reflected in SA sub objective E2:....etc.*'

Following on from this, the next column in Table 5.1 (what will the SA look for in the Core Strategy DPD and other LDDs?) should be amended to read '*Protection for nationally designated landscapes and their setting, the conservation and enhancement of landscape character and local distinctiveness, plus support for land management practices which actively maintain landscape character.*'

**Q8. Are the proposed indicators in the SA Framework suitable for the appraisal and monitoring of the sustainability effects of implementation of the Core Strategy DPD? Are there any indicators that are missing, or that need amending?**

**A8.** The indicator for appraisal objective E2 should include the following indicator '*Percentage of the Shropshire Hills AONB area which is in some form of environmental land management agreement.*' The other indicators for this appraisal question are supported.