

Shropshire Hills AONB Partnership

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Your Ref:
Our Ref:

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Dear Sir

Re: West Midlands Regional Spatial Strategy – Phase 2 Revision, Spatial Options.

This letter, and the accompanying joint response from the West Midlands AONBs, forms the response from the Shropshire Hills Area of Outstanding Natural Beauty (AONB) Partnership to the above consultation. AONBs are a national designation, covering England's finest landscapes and their landscape qualities are equivalent to those of National Parks. The purposes of designation are:

- To conserve and enhance natural beauty.
- In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry, and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.
- Recreation is not an objective of designation, but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.

The primary purpose of AONBs to conserve and enhance natural beauty is acknowledged in the WMRSS, but our remit to promote 'sustainable forms of social and economic development' should also be noted.

Our comments on question H7 are set out below, as these are specific to the Shropshire Hills.

Question H7 (Housing Distribution): You may wish to consider specific parts of the Region, please set out any comments you wish to make on any part of the Region.

Response to H7.

The Shropshire Hills AONB Partnership supports Option Two. A small amount of new housing, subject to the appropriate environmental assessments, would help to support the social and economic needs of some of the most rural communities within the AONB. Policy for the location of development sites will be determined in later Development Plan Documents from the Local Authorities and not through the WMRSS. We are currently undertaking landscape sensitivity and capacity mapping work in partnership with the Local Authorities in the AONB which will help to shape our response to such proposals.

I hope the comments here and in the accompanying joint response are useful. I would be willing to discuss them further should the opportunity arise.

Yours sincerely

Joy Tetsill
Planning and Policy Officer

The West Midlands AONBs: Response to Specific Questions in the RSS Phase 2 Options Consultation

The West Midlands contains 5 Areas of Outstanding Natural Beauty and part of the Peak District National Park. Three of the AONBs (Cannock Chase, the Malverns and the Shropshire Hills) are wholly within the Region, whilst the other two (the Cotswolds and Wye Valley) cover more than one Region. This Joint Response is made on behalf of Cannock Chase, the Malverns, the Shropshire Hills and Wye Valley AONBs.

There are a number of issues which the West Midlands AONBs feel should be addressed in the WMRSS more widely than the Phase 2 revision permits. We have commented on them in the first part of this document. We ask that they be taken into account should the opportunity arise in the future. The second part of this document addresses some of the specific questions from the WMRSS consultation.

General comments on the WMRSS

General comment 1

AONB Management Plans

The Countryside and Rights of Way Act 2000 requires that Management Plans be prepared for AONBs. Section 85 of this Act also places a duty on public bodies to have regard to the purpose of conserving and enhancing natural beauty. Accordingly, we ask that the WMRSS makes reference to AONB Management Plans vehicles for delivery.

General comment 2

Climate Change, Sustainability, Ecological Footprint and the Environment

The WMRSS needs to be stronger and clearer on number of key issues:

- Climate change
- Sustainable living
- Ecological footprint
- The environment and natural resources

Chapter 2 of the WMRSS mentions sustainability and sets out guiding principles for climate change, and this is to be commended. However, the four principles above are of fundamental importance to the wellbeing of the Region and we suggest they should form an overarching policy framework for the whole of the Strategy. Such a framework should present clear, unambiguous policies to set the context and direction for the remainder of the document. The Draft Regional Spatial Strategy for the South West (2006 – 2026) provides a very good model for how this might be done. We have set out their policies below:

SD1 The Ecological Footprint

The region's Ecological Footprint will be stabilised and then reduced by:

- Ensuring that development respects environmental limits
- Requiring the wise use of natural resources and reducing the consumption of key resources such as energy, water and minerals
- Building a sustainable, low carbon and low resource consuming economy which can be secured within environmental limits to bring prosperity and well-being to all parts of the region
- Requiring sustainable construction and design as the norm in all future development and when opportunities arise improving the region's existing building stock in line with current best practice
- Minimising the need to travel by better alignment of jobs, homes and services, reducing the reliance on the private car by improved public transport and effective planning of future development, and a strong demand management regime applied in the region's main centres in particular
- Requiring a shift towards the more sustainable modes of transport
- Meeting national and regional targets relating to renewable energy, resource consumption/extraction and waste production/recycling

Local authorities, regional agencies and others will include policies and proposals in their strategies, plans and programmes to assess how all new developments, regeneration areas and major refurbishments contribute to stabilising and reducing the region's ecological footprint

SD2 Climate Change

The region's contribution to climate change will be reduced by:

- Reducing greenhouse gas emissions at least in line with current national targets, i.e. by 30% by 2026 (compared to 1990 levels)
- Following the principles outlined in SD1

The region will adapt to the anticipated changes in climate by

- Managing the impact of future climate change on the environment, economy and society
- Identifying the most vulnerable communities and ecosystems given current understanding of future climate change and provide measures to mitigate against these effects
- Avoiding the need for development in flood risk areas and incorporating measures in design and construction to reduce the effects of flooding
- Recognising and putting in place policies and measures to develop and exploit those opportunities that climate change will bring
- Requiring 'future proofing' of development activity for its susceptibility to climate change
- Improving the resilience and reliability of existing infrastructure to cope with changes in climate and in the light of future demand.

It will be a priority for the places identified in Section 3 to determine potential future climate change impacts and plan ways in which key services and infrastructure needs to adapt. All Local Authorities in their LDDs will need to demonstrate how they intend to contribute towards the required 60% cut in CO2 emissions by 2050 and how they intend to identify and respond to the potential impacts of climate change in their area.

SD3 The Environment and Natural Resources

The region's environment and natural resources will be protected and enhanced by:

- Ensuring that development respects landscape and ecological thresholds of settlements
- Reducing the environmental impact of the economy, transport and development
- Positively planning to enhance natural environments through development, taking a holistic approach based on landscape or ecosystem scale planning
- Planning and design of development to reduce pollution and contamination and to maintain tranquillity
- Positive planning and design to set development within and to enhance local character (including setting development within the landscape of the historic environment), and bringing historic buildings back into viable economic use and supporting regeneration
- Contributing to regional biodiversity targets through the restoration, creation, improvement and management of habitats

SD4 Sustainable Communities

Growth and development will be planned for and managed positively to create and maintain Sustainable Communities throughout the region by:

- Realising the economic prosperity of the South West and reducing disparity
- Setting a clear vision and strategy to meet the diverse needs of all people in existing and future communities, based on the role and function of cities, towns and villages and their local character and distinctiveness
- Linking the provision of homes, jobs and services based on role and function so that cities, towns and villages and groups of places have the potential to become more self contained and the need to travel is reduced
- Promoting a step change in public transport, taking steps to manage demand for travel, and promoting public transport 'hubs' and access to them
- Encouraging business activity and particularly small businesses and their contribution to the region's prosperity, including through promoting regional sourcing
- Making adequate and affordable housing available for all residents, including the provision of a range and mixture of different housing types to accommodate the requirements of local communities
- Making the best use of existing infrastructure and ensuring that supporting infrastructure is delivered in step with development
- Investing in and upgrading cultural facilities, including their marketing and management
- Creating healthy, safe and secure places to live, for example by following Lifetime Homes and Secure by Design principles
- Providing homes which are adaptable to the changing needs of individuals and provide an opportunity for live/work space
- Delivering a step change in the quality of urban living
- Providing networks of accessible green space for people to enjoy

- Supporting social and economic progress by enhancing education, skills development and training

General Comment 2

Planning Gain and Green Infrastructure

All of the housing options outlined in the WMRSS show an increase in numbers, and the knock-on effect of this on other aspects of the Strategy is rightly discussed. However, the associated effects on the environment are not so clearly thought out or presented. We recognise that as nationally protected landscapes, the Region's AONBs are unlikely to accommodate large scale development. They will though, come under increasing pressure for recreation and tourism and the Strategy needs to outline how this will be dealt with. We suggest that planning gain mechanisms which direct money or resources to the management of AONBs is one possible method, and would urge the WMRSS to consider giving some direction on this. Other methods may include a Green Infrastructure Plan for areas such as Cannock Chase, or the Wrekin in the Shropshire Hills, where the effects of development outside the AONB boundary are likely to be most keenly felt. Allied to this point is the provision of appropriate infrastructure, including adequate public transport linking urban areas with the countryside.

Lastly, in the context of rural renaissance, there must be recognition that green infrastructure and the bank of high quality environment are factors in the choice of business and housing venues. This means that the green infrastructure must be maintained and protected appropriately.

Specific comments

This part of the response deals with questions H14, W15, A1 and A4. Question H7 (Housing distribution) is dealt with in the covering letter.

Specific comment 1

Question H14: Should the WMRSS identify those parts of the Region with a relatively high need for social housing where a lower threshold for negotiating Section 106 agreements with the private sector should be considered in LDDs?

Response to H14.

The West Midlands AONBs support the setting of targets for affordable housing in the region.

The current threshold of 25 houses and even the proposed threshold of 15 houses are highly unlikely to apply to any housing development within the Region's AONBs. This contrasts with a relatively high need for affordable housing which could be provided via this mechanism. A lower threshold can only be beneficial in these circumstances.

Specific comment 2

Question W14: Should the WMRSS only support the allocation of new landfill sites in Waste Development Frameworks where they are supported by evidence of the depletion of existing landfill capacity and a shortage of capacity in the Plan period following a study of the existing sites with planning permission for landfill but which do not have a waste management licence or permit from the Environment Agency?

Response to W14

We feel that this policy could be expanded to show that factors other than just the depletion of existing landfill capacity (e.g. environmental constraints) are likely to play a role in landfill site allocation. If this policy is taken as read there is a danger that environmental factors may be sidelined when landfill site allocations are proposed. We suggest that the principle of environmental constraints to site allocation is mentioned at the Regional level.

Specific comment 3

Question W15: Should the WMRSS include a policy which requires relevant Waste Development Frameworks outside the MUAs to identify sites for the treatment and management of Agricultural Waste, based on the premise that:

- agricultural undertakings adopt sustainable waste management practices with regard to waste arisings and best agricultural practice in relation to any wastes treated or disposed of on a farm: and
- opportunities for necessary additional sustainable waste management capacity in rural areas for waste recovery or recycling should be based on:

- **effective protection of amenity and the environment: and**
- **the proposed activity is appropriate to the area proposed?**

Response to W15.

The West Midlands AONBs support the inclusion in the WMRSS of a policy based on the premises outlined in question W15.

Agriculture is the one of the most important industries within the West Midlands AONBs and all AONBs required to take account of its needs. The provision of sites for the treatment and management of agricultural waste, if subject to the criteria proposed, would support the industry and bring environmental benefits.

Specific comment 4

Question A1: Do you have any comments on the suggested policy revision (it is proposed to revise policy T11 Airports so that it reads:

- **support the extension of the runway and associated works at Birmingham International Airport**
- **safeguard the development of a second runway as set out in the Air Transport White Paper at Birmingham International Airport**
- **no further development of Coventry airport beyond the outcome of the Public Inquiry**
- **continue Wolverhampton Business Airport role of serving business and general aviation**
- **consider the role of RAF Cosford following the outcome of the Defence Training Review; and**
- **amend modal split targets for Birmingham International Airport in the West Midlands Regional Spatial Strategy Monitoring section.**

Response to A1.

The WMRSS consultation document explores the issues around airport expansion in the region. Whilst it does cover environmental issues, these are all in the context of localised impacts such as damage to a Site of Scientific Interest and noise levels for residents close to the airports. There appears to have been no consideration of the indirect impacts of increased air traffic, in particular the routing of flight paths, over the region's countryside. This is especially important as peace and tranquillity are some of the special qualities of all the West Midlands AONBs and are likely to be significantly adversely affected by such an increase. We recommend that the policy be amended to include a consideration of the impacts of airport development on the region's countryside, including AONBs.

Specific comment 5

Question A3: Do you agree with the roles described for each airport?

Response to A3

We recognise that air traffic is forecast to increase over the period to 2030 and that this has implications for the Region's Airports. Given the fundamental importance of tranquillity to the West Midlands AONBs we would not support the expansion of Wolverhampton Business Airport or the removal of the restriction on the use of jet aircraft at this airport. We also wish to be consulted on any future proposals that would alter the current levels of use of RAF Cosford.

Specific comment 6

Question A4: Is the requirement for an 'Airport Development Document' an appropriate policy to include in the West Midlands Regional Spatial Strategy?

Response to A4

The West Midlands AONBs support the proposal to require the preparation of Airport Development Documents. Such documents would provide a good mechanism for assessing the effect of airport development on AONBs. We suggest therefore, that the remit of such documents should include the need to take account of the impacts of airport development on the Region's AONBs. Airport Development Documents would also provide the opportunity to integrate airport development with other land use and transport planning documents.