

Comments on Core Strategy: Preferred Options

Text

1. Paragraph 2.11, page 11

Paragraph 2.11 on page 11 refers to the South Shropshire Hills being designated as an Area of Outstanding Natural Beauty (AONB). The correct term is the **Shropshire Hills** AONB. Also, the AONB covers 804 km² out of 3197 km² of the plan area and thus represents one quarter rather than one fifth of the area. The sentence should be rephrased as 'The Shropshire Hills AONB occupies about one fifth of the plan area'.

2 Paragraph 4.24, page 40

Paragraph 4.24 on page 40 gives the impression that biological, geological and archaeological features will only be assessed when minerals or waste developments are proposed on derelict or degraded land. Spatial objective J and preferred options (i) and (iii) make reference to the need to conserve and enhance such natural assets in all types of development, not just on derelict or degraded land. The Core Strategy needs to include textual information to support this approach. A second paragraph, dealing with development in general, under this heading would address this.

3 Paragraph 4.23, page 40

Paragraph 4.23 on page 40 makes reference to sensitive land uses, but there is no definition of what a sensitive land use is. Reference should be made to such a definition either in the text, or the glossary.

4 Paragraph 4.32, page 42

The phrase 'a **proportion**' of the site's energy consumption' in paragraph 4.32 on page 42 assumes that renewable energy can only make a limited contribution to climate change. There is an opportunity to aim higher than this by substituting the phrase 'all or part' for 'a proportion' in this sentence.

5 Paragraph 4.64, page 53

Paragraph 4.64 on page 53 mentions Regional Spatial Strategy Policies but omits any reference to government guidance. Such references are made elsewhere in the Core Strategy, in paragraph 4.69 for example. A reference to PPS 7 – Sustainable Development in Rural Areas would show how the Core Strategy reflects government guidance on the protection of AONBs. It would also maintain consistency in the document.

Policies

1 Policy CP2, point (b)

Point (b) of policy CP2 refers to local biodiversity and geology but does not make specific reference to internationally or nationally protected sites and species, or to national Biodiversity Action Plan priorities. These are nationally important resources that should receive the highest level of protection in the plan process. An additional point should be added to the list:

m) Internationally and nationally protected sites and species and national biodiversity action plan priority habitats and species.

2 Policy CP2, point (c)

Policy CP2 does not mention the Shropshire Hills AONB in point (c). The AONB is a nationally designated landscape that should receive the highest level of protection in the planning system. Point (c) also refers to landscape character without using the word 'distinctive'. Use of the word 'distinctive' would clarify this policy by focusing on those features that are characteristic in different parts of the plan area. Point (c) should be re-worded as follows:

c) The Shropshire Hills AONB and the distinctive landscape character of the plan area.

3 Policy CP3, point (v)

Point (v) of policy CP3 mentions landscape. This point would be made more clearly and if the words 'distinctive landscape character' were used (see also my comment on point (c) of policy CP2). This point also omits any reference to the historic environment – a heritage asset that is different to archaeology. Point (v) should be re-worded as follows:

v. The conservation of biodiversity, geology, distinctive landscape character, the historic environment and archaeology.

4 Policy CP3, point (xii)

Point (xii) of policy CP3 addresses the potential for providing a **proportion** of the sites energy consumption from renewable resources. This assumes that renewable energy can make only a limited contribution to climate change.

There is an opportunity to aim higher than this by substituting the phrase 'all or part' for 'a proportion' in this sentence. Point (xii) should read:

Xii The potential for providing all or part of a site's energy consumption from on-site renewable energy resources.

5 Policy CP14, final paragraph

Whilst I generally support policy CP14, the final paragraph states that 'Development which will cause adverse impacts on nationally designated areas or features will only be permitted where there is a **justifiable need** for the development which outweighs these impacts'. A change of wording to 'Development which will cause adverse impacts on nationally designated landscapes or features will only be permitted **in exceptional circumstances where it has been demonstrated that the public interest outweighs these impacts**' would bring this policy into line with PPS 7.

General approach

1 General approach, natural assets

The general approach to the plan area's natural assets could be better balanced. The section on the historic environment (paragraph 2.19) is very well written and correctly draws out the importance of this resource. The sections on landscape, biodiversity and geology (2.9, 2.11 and 2.12 – 2.14) do not emphasise the value of these assets to the same extent. This is especially important in view of the desire to develop joint Supplementary Planning Documents for landscape and biodiversity.

Paragraph 2.9 should briefly mention the number of geological eras represented in the plan area and draw out their historical importance more.

Paragraph 2.11 should mention the some of the special features of the Shropshire Hills AONB. These are listed in the AONB Management Plan. It should also include a brief overview of landscape types. The high value of the plan area's landscape should be emphasised.

Paragraphs 2.12 to 2.14 should mention internationally and nationally protected species as well as national and local Biodiversity Action Plan priority habitats and species. The value of these natural assets should be highlighted. Similarly, the importance of trees, woodlands and hedgerows should be included in this part of the Core Strategy to provide a foundation for policy CP15. This would also begin to introduce a joint SPD on this topic.

2 General approach, links

Table 3.2 on page 31 shows the links between the spatial objectives, the preferred options and policies. A further link could be included; spatial objective J could be shown as linking to preferred option (iii) and thus policies 11-15. More links to preferred option (ix) could also be made if policies CP9 and CP12 included a reference to the afteruse of sites. The second sentence of the first section of CP9 could be amended as follows:

'In considering planning applications for mineral and waste development, the Council will promote opportunities to incorporate design, operational and afteruse measures which:'

Policy CP12 could be altered so that point (h) reads:

h) Any opportunities to improve the quality of Shropshire's natural resources through afteruse or restoration.

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