

SSDC Core Strategy Issues and Preferred Options Report: Shropshire Hills AONB Response

1. Overall comments.

- 1.1 The issues and options paper of the Core Strategy is welcomed for its useful role in furthering the aim of sustainable development in the District. The general approach of the document is supported, as it gives good recognition of protecting the environment, but balanced with economic and social factors. It also gives good recognition of the Shropshire Hills AONB and the AONB Management Plan. The importance attached throughout the document to community involvement is supported. The focus of the strategy on provision of affordable housing is relevant to the aims of the Shropshire Hills AONB, as this is crucial to retaining sufficient people to work on the land and maintain the landscape.
- 1.2 Interpretation of the Shropshire Hills AONB's remit has developed in recent years, and it is desirable not to portray this as merely being about visual aspects. The term 'landscape' is often interpreted in this way, though understanding of this too is broadening. The legal basis for AONBs remains 'natural beauty', but AONB purposes include a need to have regard to socio-economic issues and promote sustainable development. The recognition of the effect that impacts of increased road traffic can have on the Shropshire Hills AONB is welcomed, though it is not easy to create policies which address this as well as other, especially economic, objectives.

2. Specific Options

- 2.1 Issue H6 Location of New Housing Development. The AONB Partnership believes that **Option 2**, to continue to develop the existing policy provides the best option. It provides the flexibility for houses to be built where people need them but retains control over where this will take place. There will however be a need to address urgently the possible locations for new development where these are limited, especially in Church Stretton. The Partnership looks forward to working with the District Council on developing sensitivity and capacity mapping approaches based on Landscape Character Assessment to inform the Site Allocations DPD.
- 2.2 Issue H8 Environmental Conservation (Housing). **Option 3** supporting Parish Plans and Town & Village Design Statements is preferred. While community involvement in design issues is valuable, this is a technical area and the potential value also of informed professional input e.g. through a Design SPD should not be overlooked. Providing resources to support communities to prepare Town and Village Design Statements is also important, and the District Council's contribution to the AONB Partnership helps to achieve this.
- 2.3 Issue H9 Energy and Resource Conservation in Housing. The Partnership supports the importance attached to energy, recognising that global warming is probably the biggest long term threat to the AONB. **Option 3** is preferred for a policy requirement, providing a balance with economic viability. The adoption of higher standards of energy and resource conservation should however be supported where possible.
- 2.4 Section 5 Stimulating the Economy. This section does not adequately convey the vision of the high quality environment of the District as an economic asset. This

underpins both tourism and opportunities to support farm incomes, e.g. through agri-environment schemes, woodland management for wood energy and by accessing local markets. Work commissioned recently by regional bodies on the Shropshire Hills AONB highlights the importance of the 'environmental economy' to the area, and the great potential for its development. **A further priority** should be added “**Support the development of economic activities which draw on the high quality of the environment and use it sustainably**”. The options in general tend to put forward a more environmental approach against a more economic one, which is likely to polarise opinion and limit constructive debate about the potential to meet both objectives. A further argument for controlling inappropriate development is that it may limit the potential for other more sustainable economic activities, by harming the environmental qualities on which other businesses can capitalise.

- 2.5 Issue E1 Business growth and the location of business land. While the focus for employment land being on market towns is desirable, **option 2** provides a more flexible approach. Where businesses directly link to the high quality environment, and especially where their operation helps to maintain it, their location in more rural areas should be supported. These businesses may well employ local people, such that car use may not always be increased. 'Footloose' industries without this link and with a more significant impact should be located outside the AONB. In this respect, a firmer policy should apply to Church Stretton as the only market town within the AONB.
- 2.6 Issue E 3 Farm diversification. This is an example of options setting the environment and economy too much against each other. **An adaptation of option 2** may be preferable “**Actively encourage farm diversification (especially as rural building conversions) appropriate to the rural area, in terms of location, setting and scale, and especially activities which support the sustainable management of land.**” Such activities might include processing or adding value to land based products (food, wood, etc) or sustainable tourism enterprises on farms under conservation management.
- 2.7 Section 6 Protecting the Environment. Where the AONB is referred to, it is desirable, certainly the first time and perhaps repeated occasionally, to use the name “Shropshire Hills AONB” (para's 6.3. and 6.4, 6.14). The AONB Management Plan has a specific objective to raise the profile of the designation. In addition the Partnership believes that consistent use of the 'Shropshire Hills' identity will help develop a 'brand' in support of sustainable tourism (see our briefing note of February 2006 on this).
- 2.8 Paragraph 6.12 The first priority should refer to landscape quality as well as character and use the word 'conserve' rather than 'preserve'. The latter implies a 'no-change' approach when in fact, appropriate change is desirable. This point should be carried through into other areas such as biodiversity.

There is an increasing emphasis in both biodiversity and the historic environment on a 'landscape scale' and a need to look beyond sites and features. **A preferred wording for the second priority** may therefore be “**To conserve and appropriately manage biodiversity assets both within and outside designated sites.**”

- 2.9 Issue En1 To conserve and enhance the local landscape. **Option 2** best addresses the issues raised above. In addition it is desirable to conserve areas outside the

AONB boundary which may be justifiable for inclusion in the Shropshire Hills AONB in any boundary review.

- 2.10 Issue En2 Biodiversity The emphasis on woodlands in the wording of option 3 is perhaps not justified. Though many woods could have better management, in general they are more robust and less under threat than grassland and other habitats, which are still declining in the District. **Option 3** could be reworded as “**Promote the conservation and enhancement of wildlife habitats and species and encourage landowners to develop the sustainable management of these**”
- 2.11 Issue En3 Development within the Flood Plain. **Option 1** is preferred, as flooding is likely to occur more frequently and with greater intensity as a result of climate change. Development on the flood plain will restrict the ability of natural systems to cope with high water levels.
- 2.12 Issue En4 Reducing energy consumption and promoting alternative energy generation and micro-generation. **Option 3** is supported as it goes the furthest in reducing reliance on non-renewable energy, and includes the important aspect of energy conservation. Detailed policy must ensure that micro-generation is strongly promoted and that intrusive energy installations which would affect the AONB are not permitted. The importance of this issue however requires that efforts be made to incorporate energy conservation and micro-generation even in sensitive buildings and locations and to find ways to integrate these successfully within the landscape.
- 2.13 Issue C3 Access to Services. Some services will be most appropriate for provision in market towns. For other services, more dispersed provision may be more effective and might also reduce car travel by locating close to the point of need. **Option 2** provides the flexibility to allow for this.
- 2.14 Issue C5 Community Involvement. **Option 1** is preferred. Design Statements, and other methods of community involvement such as Parish Plans, provide a vehicle for communities to identify local distinctiveness. This option would provide a mechanism for delivering local aspirations whilst conserving landscape character.
- 2.16 Paragraph 8.7 Renewable energy. The policy in relation to renewable energy and the AONB will need to be more detailed and clearer than this, and find ways of being positive about appropriate forms of development. The National Association for AONBs position statement says that large scale developments (e.g. wind farms) should not be allowed, but small scale renewable energy should be actively encouraged. Members of the AONB Team attended a recent conference on renewable energy in protected landscapes and it is hoped to prepare a position statement for the AONB Partnership on this topic soon.
- 2.17 Paragraph 8.11 Shopping Farm shops link directly to positive management of the landscape and should have more support than enterprises such as garden centres which do not.

Joy Tetsill
Planning and Policy Officer
For the Shropshire Hills AONB Partnership
16th May 2006