

Comments on Telford and Wrekin draft Core Strategy

1. A profile of the Borough, Section 2.1 page 6

New text (shown below in italics) should be inserted in paragraph 2.1 as follows:

The Borough has two distinct urban areas of Telford and Newport and a large, sparsely populated rural area which accounts for nearly three quarters of its land area. *The Wrekin and the Ercall in the south west of the Borough make up part of the nationally protected landscape of the Shropshire Hills Area of Outstanding Natural Beauty.* The River Severn flows through the Ironbridge Gorge World Heritage Site which forms Telford's southern boundary.

1.1 Reason for proposing changes to section 2.1, (page 6) of the DPD

This text does not have regard to section 85 of the Countryside and Rights of Way Act 2000 which 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" to their purposes. More specifically, section 89 states that the relevant local authority in respect of an area of outstanding natural beauty shall 'prepare and publish a plan which formulates their policy for the management of the area of outstanding natural beauty and for the carrying out of their functions in relation to it.'

A Management Plan for the Shropshire Hills was published in 2004 by the AONB Partnership - of which the Borough of Telford and Wrekin are members. The Management Plan should form part of the background to the Core Strategy and the Borough should show how the purposes of AONB designation and the Management Plan have been recognised within the text of the Core Strategy.

In addition, the Environment Technical Paper (part of the background for the LDF) makes no reference to the Shropshire Hills AONB or the AONB Management Plan. The Core Strategy is thus not founded on a robust and credible evidence base.

2. Key Issue, Natural Environment, paragraphs 4.34 to 4.37 (page19)

A new paragraph should be inserted as follows;

Protect and conserve landscape character and local distinctiveness: The highest level of landscape protection has been afforded to part of the Borough. Such outstanding natural beauty and the diverse and distinct character of the countryside in general, enrich our quality of life and greatly increase enjoyment of natural resources.

2.1 Reason for proposing changes to Key Issue, Natural Environment paragraphs 4.34 to 4.37 (page19)

This Key Issue does not have regard to section 85 of the Countryside and Rights of Way Act 2000 which 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" to their purposes. More specifically, section 89 states that the relevant local authority in respect of an area of outstanding natural beauty shall 'prepare and publish a plan which formulates their policy for the management of the area of outstanding natural beauty and for the carrying out of their functions in relation to it.'

A Management Plan for the Shropshire Hills was published in 2004 by the AONB Partnership - of which the Borough of Telford and Wrekin are members. The Management Plan should form part of the background to the Core Strategy and the Borough should show how the purposes of AONB designation and the Management Plan have been considered, when formulating the Key Issues for the Core Strategy.

In addition, the Environment Technical Paper (part of the background for the LDF) makes no reference to the Shropshire Hills AONB or the AONB Management Plan. The Core Strategy is thus not founded on a robust and credible evidence base.

3. Spatial Objectives, 'A place that is attractive, vibrant and with a high quality sustainable environment (page 23)

A new bullet point should be included as follows:

- Conserve and enhance the natural beauty of the Shropshire Hills AONB

3.1 Reason for proposing changes to Spatial Objectives 'A place that is vibrant..... and with a high quality environment (page 23) of the DPD

This Spatial Objective does not have regard to section 85 of the Countryside and Rights of Way Act 2000 which 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" to their purposes. More specifically, section 89 states that the relevant local authority in respect of an area of outstanding natural beauty shall 'prepare and publish a plan which formulates their policy for the management of the area of outstanding natural beauty and for the carrying out of their functions in relation to it.'

A Management Plan for the Shropshire Hills was published in 2004 by the AONB Partnership - of which the Borough of Telford and Wrekin are members. The Management Plan should form part of the background to the Core Strategy and the Borough should show how the purposes of AONB designation and the Management Plan have been considered, in formulating the Spatial Objectives of the Core Strategy.

In addition, the Environment Technical Paper (part of the background for the LDF) makes no reference to the Shropshire Hills AONB. The Core Strategy is thus not founded on a robust and credible evidence base.

4. Development Policy CS1: Delivering sustainable development, page 36

A new bullet point should be included within this policy as follows:

- Ensure that areas of land with national landscape designations are conserved and enhanced

Text referring to the protection offered to internationally and nationally protected species (under the Habitats Regulations and the 1981 Wildlife and Countryside Act) and to the status of BAP habitats and species, should also be included.

4.1 Reason for proposing changes to Development Policy CS1: Delivering sustainable development, (page 36) of the DPD

This Development Policy does not have regard to section 85 of the Countryside and Rights of Way Act 2000 which 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" to their purposes. More specifically, section 89 states that the relevant local authority in respect of an area of outstanding natural beauty shall 'prepare and publish a plan which formulates their policy for the management of the area of outstanding natural beauty and for the carrying out of their functions in relation to it.'

A Management Plan for the Shropshire Hills was published in 2004 by the AONB Partnership - of which the Borough of Telford and Wrekin are members. The Management Plan should form part of the background to the Core Strategy and the Borough should show how the purposes of AONB designation and the Management Plan have been considered, in the formulation of Development Policies for the Core Strategy.

In addition, the Environment Technical Paper (part of the background for the LDF) makes no reference to the Shropshire Hills AONB. The Core Strategy is thus not founded on a robust and credible evidence base.