

## **Comments on Telford and Wrekin Sustainability Appraisal for the Core Strategy**

### **1. Environmental Objective EN3 (page 5)**

New Environmental Objectives and Indicators should be included as follows:

1. Protect and enhance the nationally protected landscape of the Shropshire Hills AONB
2. Maintain and enhance the local landscape character and distinctiveness in the countryside

The Indicators for these objectives should be:

1. Prepare and implement a Conservation Plan and a Management Plan for the Wrekin and Ercall areas
2. Area and % of land in agri-environment schemes (including Woodland Grant) or equivalent

#### **1.1 Reason for proposing changes to Environmental Objective EN3, (page 5)**

This Sustainability Appraisal 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 through the Sustainability Appraisal process.

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.