

## Response of Shropshire Hills AONB Partnership to the Shropshire Core Strategy: Issues & Options consultation, 13 March 2009

This response has been informed by discussion at full meetings of the AONB Partnership on 10 February and 26 February, and by consultation on a draft with the 36 members of the Partnership. There is a broad consensus among members regarding the overall position of the response. Given the remit of the Partnership, the response outlines what we consider to be the best planning approach for the Shropshire Hills AONB rather than for the whole county, though the context in which the AONB sits is borne very much in mind. The response focuses on Choice 1: the Strategic Approach, and comments are made on a number of other choices which have most relevance to the AONB. The response is based on the approach of the new AONB Management Plan <sup>1</sup>, which has been developed with wide involvement and consultation over the last year or so. The Plan has recently been endorsed by the AONB Partnership and is currently going through formal approval with the local authorities. The response is also framed with reference to the purposes of AONB designation <sup>2</sup>:

- *The primary purpose of designation is to conserve and enhance natural beauty.*
- *Account taken of the needs of agriculture, forestry, rural industries and economic and social needs of local communities.*
- *Particular regard to promoting sustainable forms of social and economic development.*
- *The demand for recreation should be met so far as this is consistent with other purposes.*

The right approach is sought however for the Shropshire Hills. This may differ both from other parts of the county and from other AONBs, where the social and economic context, and perhaps the relationship between settlement and the landscape, may be very different.

### VISION AND STRATEGIC OBJECTIVES

The Spatial Vision and Strategic Objectives read much like 'business as usual', and while acknowledging climate change, does not adequately express the extent of change of approach required for this. The Government's Stern Report <sup>3</sup> recommended annual investment of 1% of GDP towards lowering carbon emissions – for Shropshire this amounts to around £66million annually. The important aspects of building resilience as an adaptation measure, both in infrastructure and in communities, are not prominent enough.

We note that the Core Strategy is supposed to provide "*spatial expression of the Community Strategy and show how planning can deliver its objectives*". Though the review of the Sustainable Community Strategy is supposedly concurrent, there is no new draft of this available at the current time for comment. This timing problem seriously undermines the link between these two documents and very much limits the ability of the Core Strategy in reality to provide that spatial expression of the Sustainable Community Strategy. Basing the links on the previous Community Strategy is not a very satisfactory alternative, since we understand that a decision has been made thoroughly to review the Community Strategy rather than undertake a 'light touch' update. In particular we feel this is important since the previous Community Strategy does not give anything like enough priority to climate change mitigation or adaptation. We observe that thinking on these topics is evolving quite rapidly, and wonder whether the longer time horizon of the Core Strategy and Community Strategy could stifle adaptation in rapidly changing circumstances? A long term view coupled with regular review is probably the solution to this.

We welcome the high profile and importance attached to the AONB designation in the document, e.g. its clear depiction on maps. Para 2.29 says that the AONB covers around a fifth of the county; at 23% it is closer to a quarter. It may be appropriate also to mention that the AONB Management Plan is a statutory document.

## CHOICE 1 - STRATEGIC APPROACH

After considering carefully the options, along with possible combinations and alternatives **the AONB Partnership expresses strong support for Option E Rural Rebalance, in respect of the Shropshire Hills AONB and the southern spatial area.** We do not express a view on whether this is the appropriate option for other rural areas or for the whole county. We consider however that **the merits of this option for the southern area are such that some differentiation of the southern area following this option must form a part of the overall county approach.** We are aware that this option will mean the most new development in the AONB of any of the options, and may not superficially be the one the Partnership might be expected to support. The rationale for the Partnership's position is therefore outlined in some detail below.

The **AONB Management Plan 2009-14** stresses that the Shropshire Hills, while containing valuable elements of wildness, is essentially a settled landscape and a living, working area. Active land management, in particular through livestock farming, is what has shaped and what maintains the landscape we have today. The high environmental value of the area is coupled with particular social and economic needs, which are not necessarily typical of the whole county. The Shropshire Hills or parts of it represent the extreme end of the spectrum on many measures, both within Shropshire and indeed the West Midlands region. The 23% of Shropshire which is the AONB has only 6.25% of the county's population. 26% of the AONB's population is employed in agriculture, compared to 4.3% in the county as a whole. Other such measures include remoteness, high average age of the population and of farmers in particular, the economic importance of tourism relative to other sectors, and affordability of housing.

The latter issue is of central importance for the south of the county in relation to the Core Strategy, and the Partnership is very mindful here of the requirement in AONB purposes to take account of *"economic and social needs of local communities"*. The Management Plan notes that *"Though the issue of affordable housing is not unique to the Shropshire Hills or to AONBs, the issue is fundamentally connected with the AONB. The natural beauty of the area attracts incomers, and protection of the landscape limits supply of new housing; both therefore contribute directly to the affordability problem. It is not desirable that the existence of natural beauty and its protection have negative social consequences. With care and thought it should be possible to address housing need in ways which are also compatible with protecting the special qualities of the AONB."*

*There is a further link, in that the affordability problem to some extent limits the labour and skills available to manage the landscape. In such cases, provision of affordable housing will help directly to conserve the landscape as well as supporting the social and economic needs of the area.*

*Rural areas are of importance as functioning areas in their own right, and should not be seen merely as a hinterland to urban areas. Smaller settlements must be allowed to be 'sustainable' too, and preventing all development will work against vitality and exacerbate affordability problems. Modest levels of affordable housing development in these smaller*

*settlements will help to support the social and economic needs of some of the most rural communities within the AONB.”*

The second of five strategic priorities defined in the Management Plan is ‘**Keeping the Shropshire Hills countryside thriving**’. This recognises the importance of economic and social activity to the ‘natural beauty’ of the area, and interprets ‘thriving’ as the *“balance between economic, social and environmental factors, where one is not sacrificed at the expense of another – the essence of sustainable development.”*

The following AONB Partnership Position put forward in this section is relevant here:

*AONB PARTNERSHIP POSITION 5 The model for the economy of the Shropshire Hills should be of environment-led regeneration, in which a pattern of relatively small-scale dispersed enterprise will be key to maintaining the right balance.*

We note that the Rural Rebalance option has a lower overall score from the **Sustainability Appraisal** than some other options. On closer scrutiny however, it appears that this results in part from a number of assumptions made in the Appraisal which can be challenged:

- The Appraisal appears to take a narrow view of climate change adaptation – points on energy reduction under the carbon reduction heading are re-stated, and the vital aspects of localising food and energy production, and enhancing community resilience, appear to be overlooked. The Partnership feel that the sense of urgency required for imagination and new approaches to address these issues (such as currently being explored in an emerging ‘Transition Initiative’ for the Shropshire Hills) does not come through in the Strategy, especially on the relationship between communities and land in relation to food. The very small likely losses of greenfield land from appropriate levels of development is probably insignificant in this respect against the longer term gains of having people on the land and able to work it.
- The Appraisal assumes that the interests of the landscape are best served by minimal development, even in the long term. This view is also apparent in public opinion <sup>4</sup>, but is not necessarily supported by a more thorough analysis. It may be true for the wildest areas, but in a settled area this over-emphasis on visual rather than functional aspects of the landscape can have serious negative consequences. Social issues, especially affordability of housing, have been exacerbated by this approach in planning over a number of years, and we believe that the long term environmental health of the landscape is not necessarily served by this approach either.
- The Appraisal assumes that development in villages is bad for wildlife, referring to pressure on habitats. We contend that this need not be the case – the land-take involved is very small in a rural context, and it should be perfectly possible for new development to avoid higher quality habitats.
- The Appraisal assumes that clustered larger developments (in towns) will have higher environmental standards (e.g. in energy consumption) than smaller scale developments in rural areas. While there are some technical options such as district heating which create economies of scale in this way, we would suggest that this assumption need not always be true.
- The need to reduce carbon emissions is rightly a top priority of the Strategy, and travel especially by car is a key factor in sustainability appraisal of different options. The planning system is however only one factor influencing people’s travel patterns; people’s individual choices and travel behaviour being also very significant. It is

important that assumptions about travel behaviour arising from certain patterns of development are not too simplistic.

**Taking these factors together we would judge that the Rural Rebalance Option E deserves a higher overall score in the Sustainability Appraisal.**

In relation to other options in the Strategic Choice, we note the following:

- Across many of the options there appears to be an assumption that **Church Stretton** can continue significant growth. The limitations of physical space for new development in the town imposed by both the hills and floodplain, coupled with the effect on the character of the town, call this into question. Church Stretton is a unique case and deserves careful consideration. As the only town within the AONB, it is also the only town in the whole of Shropshire within a nationally protected landscape, and very dependent economically on visitors. A new approach to planning policy should be seen as an opportunity to take development pressure off Church Stretton, while benefiting other smaller settlements and strengthening their relationship with the town, in the way described by Church Stretton Town Council in their response.
- Levels of road traffic in the **A49 corridor** already have a significant impact on tranquillity in the AONB, affecting both quality of life and tranquillity as an economic asset in its own right. Option B in particular seems likely to exacerbate this, and is not supported by the AONB Partnership. The A49 corridor is nevertheless very important in the context of the AONB for public transport, and Church Stretton has further potential in this respect as a transport hub (though not necessarily associated with significant new development in the town).
- Under Option C Market Towns it is made clear that rural areas will be very reliant on the adoption of a robust transport strategy. This is a very significant proviso, and as no indication is given of what this strategy might be, this option appears likely not to deliver benefits to rural areas.

The concept of **rural community sustainability**, especially in relation to climate change mitigation and adaptation, is central to informing the right planning approach to an area such as the Shropshire Hills. The analysis of a report by Land Use Consultants and SQW Consulting<sup>5</sup> commissioned by Advantage West Midlands is helpful in this respect. Key aspects include:

- Remote rural areas have distinctive characteristics and functioning (as opposed to accessible rural areas closer to major urban areas), including the tendency for market towns in such areas to be more 'self-contained', serving their rural hinterlands. **A different approach to planning is therefore justified in remote rural areas.**
- Strong rural communities have a greater ability to meet locally people's needs of jobs, services and leisure, reducing the need for car travel. It is notable that despite larger distances in remote rural areas, the overall levels of road travel, reflected in carbon emissions per capita, are lower than for accessible rural areas. **Sustainability is therefore more complex than settlement size and services** – behaviour is also very significant, and something over which planning policy has little influence.
- The main objection which this report has to supporting the model of needs being locally met by strong communities is the low incomes associated with this; a position echoed by statements in the Core Strategy about increasing high earning in remote rural areas. This approach may drive up average earnings, but high earning jobs are less likely to be suited to lower skilled local people out of work. **Focusing on high earning jobs may therefore be less effective at targeting local economic need**

than for example added value activity in land management, food and drink and local products sectors.

- Alongside planning policy, other influences are significant to rural community sustainability (including service delivery, voluntary and community sector activity and public opinion). **Processes which support these other mechanisms, which connect them, and which involve people in local appraisal of sustainability issues are crucial.** The local strategic partnerships, various approaches of community capacity building, work to encourage sustainable transport and lifestyles, and our own work through for example the Sustainable Development Fund and LEADER are examples of this. The concept of assessing development proposals against locally defined sustainability needs is in theory a strong one, but in practice tools such as Parish Plans are not at the current time generally robust enough to serve this purpose. The speed of recent change in recognition of the scale of action necessary on climate change, against the time taken for processes such as Parish Plans is an issue here, as identified above.

We consider that there is a **strong case for using the AONB as a unit for differentiation** of planning policy in the new Core Strategy, but this will need to be considered carefully **alongside any differentiation based on other defined areas** (include potentially areas overlapping with the AONB). The points below expand on this:

- The AONB has a defined boundary, and national planning policy identifies a need for a distinct approach in nationally protected landscapes.
- While the issues of the AONB broadly overlap with those of a wider 'southern' area of the county, they may not do so exactly. To illustrate this, 65% of South Shropshire District is within the Shropshire Hills AONB, but this area accounts for only 15% of the District's population.
- If 'Rural Rebalance' were pursued in the AONB and not in a wider southern area, this could result in the paradox of stronger policy against development outside the AONB than within it. With a number of market towns and other land lying close outside the AONB, there are many opportunities to accommodate developments which would not be suitable within the AONB itself. Indeed the economic (and social) inter-relationship between towns and their rural hinterlands needs to be nurtured and re-discovered.
- The Partnership strongly supports the concept of Design Guidance for the AONB alongside potentially stronger policy tools, to ensure that the benefits of Rural Rebalance are achieved without the harm of 'free for all' development. This links with points under Choice 11 below.
- The capacity of the AONB Partnership for local involvement and consultation is a factor, alongside the capacity the AONB Team, especially through the Planning & Policy Officer post, to support an 'added value' approach to planning in the AONB. We welcome the discussion which has taken place on the possibility of an Area Action Plan for the AONB as part of the Local Development Framework, and would be keen to explore this further with the Council.

## CHOICE 2 DEVELOPMENT IN THE COUNTRYSIDE

We recognise the close relationship of this choice with the Strategic Approach in Choice 1. The Partnership feels that the benefits of the Rural Rebalance Option will not be achieved if the approach in Choice 2 is too restrictive. While supporting a continued focus on affordable housing and employment for local need, we believe that **flexibility as far as Option D** (Small scale housing, live-work units, rural business premises – in specific locations) would be appropriate, with suitable design standards, etc.

## CHOICE 11 SUSTAINABLE DEVELOPMENT AND DESIGN PRINCIPLES

As outlined above, we believe the AONB can and should be used as a unit of differentiation, and this is especially appropriate to Choice 11. We **therefore support Option C: Local variation**, e.g. some areas in need of regeneration at regional standards, other areas at higher standards where justified and where market will bear.

AONB PARTNERSHIP POSITION 7, from the draft AONB Management Plan is relevant here: *"Where affordable housing is allowed when other forms of development would not be, in order to meet social need, the standards of sensitivity to the AONB should not be compromised, and are expected to be higher than outside the AONB."*

Sustainability and good design are important in other areas as well as the AONB, and the Partnership would not wish to see high standards in the AONB being to the detriment of other areas. We would support standards being as high as possible across all areas, but recognise there may be limitations. We would hope that approaches piloted or pioneered in the AONB may be applicable as a model to the benefit of other areas. The Sustainability Appraisal for the draft AONB Management Plan recognises the potential for objections to higher standards on the grounds of increased costs. We believe that this need not necessarily be the case, and that good guidance along with examples of best practice can be helpful in addressing this.

Reflecting the points above about imagination and new approaches in development being necessary to meet the sustainability challenges we face, we would suggest there is a need for the new Local Development Framework to deal more effectively with lower impact and less conventional forms of development. As the AONB Management Plan suggests, if a relatively simple process of Sustainability Appraisal were required as part of a planning application, this would raise awareness of issues and improve the quality and relevance of decisions and developments themselves.

## CHOICE 12 ENVIRONMENTAL NETWORKS

We note the opportunities under Option A of targeting development contributions to defined environmental needs. While understanding the possible practical difficulties in achieving this in some cases, we support the principle of this option and its application where possible.

## CHOICE 15 RENEWABLE ENERGY SCHEMES

The Partnership has given close attention to renewable energy issues in preparation of the new AONB Management Plan. Based on this **we would support Option D: Twin track:**

proactively supportive in some locations or for certain types of renewable energy whilst cautious towards others.

- The Partnership and the Management Plan places a very high importance on climate change mitigation measures, but suggests that vigorous energy conservation measures should go hand in hand with increased renewable energy generation. The planning system has an important role in ensuring that this is the case. We recognise that energy conservation measures at the demand end may be hard to connect to renewable energy proposals at the supply end. One way of doing this however is to link any planning gain community benefits deriving from renewables developments to energy conservation measures, in preference for example to amenity projects.
- The implications of different renewable energy technologies for landscape and other considerations are very different, e.g. wind c.f. woodfuel, as is the potential within the county compared to the overall national picture. This supports an approach of differentiating both between different technologies, and on the basis of landscape value, e.g. the AONB.
- We are aware that there are economies of scale in many renewable energy technologies, and the size thresholds for development should allow these to be taken advantage of. Larger developments are however likely to have more negative impacts, including through associated infrastructure and transport. Though 5MW may not be the right size threshold in all cases, we therefore tend towards a twin track approach of options B and C, but feel that in combination with effective energy conservation, this need not be a 'light' or slow option in addressing carbon emissions.

#### **CHOICE 14: STRATEGIC PLANNING FOR MINERALS**

We have understood the key question in the consultation to be about sand and gravel, and therefore have not responded on this Choice. Quarrying for crushed rock is significant both within and near to the AONB, but we understand the consultation not to be seeking views on these aspects.

#### **References**

1. Shropshire Hills AONB Partnership (2008) *Draft Shropshire Hills AONB Management Plan 2009-14*
2. Countryside Agency (2001) *Guidance for AONB Partnership members, CA24*
3. HM Treasury (2006) *Stern Review: The Economics of Climate Change*
4. Shropshire Hills AONB Partnership (2006) *Awareness and Perception Study of the AONB*, Martin Horne Consultants
5. Advantage West Midlands (2008) *Rural Community Sustainability*, LUC and SQW Consulting