

## Shropshire Core Strategy Policy Directions consultation – comments from Shropshire Hills AONB Partnership 2 October 2009

We welcome the Policy Directions document and are pleased to see that the major points of our earlier response, on climate change and rural rebalance, have clearly come through strongly in others' comments and have been taken into account in the new document.

We particularly welcome the more flexible approach to development in rural areas and think the approaches of Local Service Centres, Community Hubs and Community Clusters could work well.

### Spatial Vision

The second para refers to "a sustainable pattern of development ... to support the development of sustainable communities that can meet the challenges...". The new material on rural development later in the document refers to helping communities to become 'more sustainable'. This move towards recognising a continuum of sustainability is welcomed, but the more black and white statements earlier in the document like this one in the Spatial Vision do not seem to fit with this. The definition by the planning system of 'sustainable settlements' has carried with it the corollary that other settlements are 'not sustainable', which is frankly unacceptable. An important principle of sustainable development is inclusivity, and the language must be used carefully to avoid writing off whole communities as unsustainable. This point also applies to Strategic Objective 1. The words 'sustainable communities' can be interpreted very differently so a definition may help.

In the lower part of p9 the spatial vision could highlight the continued importance of farming (including for food security as a climate change adaptation measure), as is picked up in Strategic objective 4 and point (vi) of the consultation responses.

Apart from these comments, the Spatial Vision is supported.

### Strategic Objectives

See point above about Objective 1.

Strategic Objective 8 on low carbon is good, but should be placed higher up in the list to give it the prominence it deserves.

### Spatial Strategy

As above, the general strategic approach is supported, along with the recognition that "sustainability is based on many factors". If development will be allowed where it helps the community to become more sustainable, the definition of community benefit at para 3.6 needs to include an environmental dimension to reflect the balance of sustainable development. The end of para 3.15 on p23 recognises this and para 3.6 should be more consistent. As the AONB Management Plan says *"The planning system should help to enable appropriate sustainable forms of development. Awareness could be raised substantially by encouraging or requiring appraisal of the overall sustainability of development proposals against economic, social and environmental criteria."*

Para 3.8 refers to this strategic approach resulting in less overall development in hamlets and the open countryside. The discussion during the last consultation on the spatial variations within the county suggest that this may be true for the north but less so for the south where policy has been stricter in the past. Could this be clarified?

We have no difficulty with the identification at this stage of Church Stretton as one of the market towns/key centres. However as we previously indicated, there is a need to recognise the particular circumstances of Church Stretton as the only town within the AONB, and this should be recognised more explicitly in later, more detailed stages of policy development.

P18 para (iv). As previously argued we would suggest that sustainability of rural (and indeed other) settlements is determined by factors including personal attitudes and behaviour as well as critical mass of population, services, etc.

Para 3.10. Explicit mention of declining oil reserves is supported, as this is a key issue often not mentioned.

P22 Policy Direction for Local Centres, Community Hubs and Community Clusters. Bullet point 1 is especially welcomed, including the "broader understanding of 'sustainability' in defining sustainable communities". Again these definitions need to be included.

Final bullet point p23 the criteria need to include an environmental dimension as above.

Para 3.14 the sentence "There is an appetite for change, for an enterprising response to the challenges of climate change, and for new models of living based on greater local self-sufficiency" is particularly welcomed. Para 3.22 on p25 in a similar vein is also welcomed. At some point in policy development, the LDF needs to put forward a positive and helpful policy on low-impact development, which fits well with the sentiment in para 3.14 but is not currently dealt with very easily by the planning system. The AONB Management Plan says on this "***Low-impact forms of development (e.g. buildings using traditional, locally sourced and low embodied energy materials) have potential to fit well with the AONB's purposes. This is especially so where they are associated with sustainable lifestyles including low energy and resource use, small-scale land management using sustainable approaches to food or wood production and with community or educational uses. Guidance and regulation will remain important to ensure compatibility with landscape, local community and other considerations. There is a case however that such development may be suitable in locations where higher impact forms of development would not be allowed. Progress is desirable to enable the planning system to assess such developments more broadly in relation to sustainable development and meeting the need for affordable housing.***"

P28 in Spatial Strategy for countryside, para 3.26 re recognisable settlements being more than a single farm - It should be recognised that many of what are now isolated farmsteads were once hamlets and small communities. The recent farmsteads work carried out by English Heritage and the County Council helps with this historical dimension, but also sets out the importance of the position of remaining historic farm buildings in relation to the current rural economy.

Policy Direction Economic Development p49. Bullet points 2 and 4 are especially supported. The last bullet point should re-emphasise the continued importance of farming as well as farm diversification.

As expressed in our response to the Sustainable Community Strategy, we are uncomfortable with how much the Core Strategy can really take its lead from the SCS given the different stages of development of the documents and processes.

Policy Direction Tourism & Culture p63

Bullet point 2 - Positive statements about developing tourism often tag on something like 'without harming the intrinsic qualities', but unless it is spelled out how this will be avoided, the development will very often cause the harm. The AONB Management Plan says

*“Development for tourism and recreation must be very sensitive to avoid damaging the special qualities of the area. For built development, the location, scale and design of development are key considerations, along with less direct impacts such as transport, and impacts on tranquillity and light pollution.”* and  
*“A sustainable approach to tourism can be defined as one which seeks to achieve less impact on the environment, more understanding and enjoyment, and more benefit to the local economy and community. The actual numbers of visitors are less important – the benefits described above may be achieved with either greater or fewer numbers.”*

Bullet point 2 p63 The rural dimension of tourism should be emphasised too, more in line p65 para (i), (ii) and (iii) and para (viii) on p66.

Bullet point 5 mentioning sustainable tourism, walking and cycling is especially supported.

#### Policy Direction Design and Local Distinctiveness p81

The inclusion of local distinctiveness is welcomed, and the mention of the AONB in bullet point 1. The inclusion under this heading of both sustainability/resource efficiency aspects of design and aesthetic aspects is welcomed. Separation of these two leads to a lack of integrated thinking on design. It is in line with Shropshire Council’s Policy 2 in the Shropshire Hills AONB Management Plan *“Consideration of the purposes of designation in all decisions affecting the AONB should reflect sustainability and the full range of special qualities defined in the Management Plan as well as landscape character and visual amenity.”*

Para 5.42 p82. We note that responses showed a preference for consistent design standards across the county, but would respectfully remind the Council that the national AONB designation is statutory and recognises the particular quality of this landscape, with the corresponding expectation of higher standards. This is not really negotiable based on a majority of respondents to the consultation! We would contend that there remains a strong argument for differentiating the AONB for higher standards of design.

Para (v) p82 The mention of the AONB Management Plan is welcomed, but it should say ‘sets out policies and actions’ and put ‘sustain local communities’ after ‘conserve and enhance...’ better to reflect the nationally defined AONB purposes.

#### Policy Direction Environmental Networks p85

This section is supported, and the language used (such as environmental networks) in this potentially difficult area is generally good. There should however be a more explicit reference to both climate change adaptation and ecosystem services.

#### Policy Direction Renewable Energy p96

The first bullet point emphasising energy efficiency is supported and is in line with the AONB Management Plan approach Shropshire Council policies 28 and 29:

*“POLICY 28 Lowering carbon emissions from the area is an over-riding priority, and should influence all areas of decision making. Energy conservation should be given the highest priority, and should always accompany renewable energy generation. Low carbon community initiatives are supported. In addition to carbon from energy use, the ability of land management to reduce greenhouse gas emissions should be optimised.*  
*POLICY 29 Integration of energy efficiency and renewable energy will be encouraged in all development – new or refurbishment, and of any scale.”*

The criteria-based approach is supported, and we would welcome the opportunity of further involvement with policy development in this area.