

## **Shropshire Local Plan Review - Preferred Scale and Distribution of Development**

### **Response from Shropshire Hills AONB Partnership – 20<sup>th</sup> Dec 2017**

The Partnership is a Joint Advisory Committee established by Shropshire Council with other parties specifically to advise in relation to the AONB and its purposes. This response has been discussed and endorsed by the AONB Transition Board at its meeting of 7<sup>th</sup> December 2017.

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3. Do you agree with the preferred housing requirement proposed for Shropshire of 28,750 dwellings between 2016 and 2036 (1,430 dwellings a year), identified in Section 2 of the Consultation Document?

No.

We have concerns that the 'High' housing numbers chosen were not supported by the majority of respondents in the previous consultation, as raised by others. It would appear that the Council is not fully taking on board the views of local people. However, our comment on this choice is focused on its potential impact on the AONB. The combination of the county target and the proportion then allocated to Church Stretton ends up determining whether one of the very problematic larger sites in Church Stretton needs to be developed or not in this period. It turns a 'sliding scale' of numbers into a very 'binary' outcome with significant implications for the AONB. See also response to Q6.

4. Do you agree with the preferred employment land requirement proposed for Shropshire of 305 hectares between 2016 and 2036 (15.25 hectares of employment land a year), based on the concept of 'balanced' employment and housing growth, identified in Section 3 of the Consultation Document?

No comment

5. Do you agree with the preferred spatial distribution of the proposed housing and employment requirements, which has an 'urban focus', identified in Section 4 of the Consultation Document?

Yes, subject to comments elsewhere about the distribution of the key centres allocation. Church Stretton's numbers should be reduced.

6. If you have any comments on any of the settlement strategies provided within Appendix 3 of the Consultation Document, please use this space to make them:

#### Church Stretton

Development in Church Stretton is very constrained by the physical landscape and high environmental quality around it. This highly unusual landscape setting is however a positive thing - it is the key both to Church Stretton's past and to its future, and should not always be characterised as a limitation. The heritage assets and their settings on the east side of the A49 in particular have not always been fully

recognised in the consideration of sites. Church Stretton is unique in Shropshire as the only market town in the AONB, and needs to be treated as such. This is not an abstract paper designation, and it is no coincidence that the real physical properties of the landscape around the town show that a very different approach is needed here. It is not sound planning once again for the argument to be made that Church Stretton has 'got off lightly' with its allocated numbers, if these numbers would result in development which is not compatible with the AONB, which is almost certainly the case. The footnote to para 14 of NPPF indicates that protection of AONBs is not outweighed by housing need, as would be suggested by the Council's proposal. The allocation process must be based on a proper assessment of capacity (policy compliant) of different places to accommodate development, and not just a theoretical numbers exercise. Even if the 'high' numbers are used, as it appears the Council is likely to do, the distribution of these could avoid harm to the AONB by significantly lowering the allocated numbers for Church Stretton. A hundred or so more houses could easily be accommodated in the larger towns, or indeed some of them could be built in some of the smaller villages in the AONB and elsewhere, which people often describe as dying on their feet. The needs of the town are not likely to be met by the provision of further market price housing, which will not have a significant impact on the demographic balance.

A similar argument can be made with regard to employment land in Church Stretton. This sort of site is suited to industrial development which is less appropriate to Church Stretton than elsewhere. Current units lie vacant indicating a lack of demand. The tourism-based economy of the town certainly needs support, but further industrial land is the wrong sort of help, and is likely to undermine this important sector of the economy. The allocation shows a 'one size fits all' approach which does not take full account of the strengths and weaknesses of the place.

**7. Do you agree with the proposed 'Community Hubs' identified within Table 3 of the Consultation Document?**

No comment

**8. Do you support the proposed policy for managing development in 'Community Hubs'?**

No comment

**9. Do you think any additional 'Community Clusters' to those identified in Table 4 should be formed? Or any of the existing 'Community Clusters' identified in Table 4 removed?**

No comment

**10. Do you support the proposed policy for managing development in 'Community Clusters'?**

No comment

**11. Do you support the proposed approaches to managing residential and non-residential development in the wider Countryside?**

No.

The categories of development covered by this section include those most regarded as threats to the quality of the AONB, including large scale poultry sheds and solar farms. The AONB Partnership as the Council's specific adviser regarding the AONB feels that the Council cannot demonstrate that its statutory duty to take the purposes of AONB designation into account has been met without addressing these important issues much more directly. Given the decisions recently made on major developments in the

AONB, the text of this section is likely to be seen as an 'anything goes' policy, as there appears to be no size or scale deemed inappropriate.

The wording of this section should mention the AONB specifically, and more generally refer to maintaining environmental quality as a positive thing. There is a lack of imagination around the possibilities of environment and heritage-led regeneration in this area, in which the AONB and its qualities are seen as an asset rather than a constraint, and activity which is in harmony with it is actively promoted. The Economic Growth Strategy final version did pick up on the very strong message from the consultation that the environment and tourism is important, but this does not appear to have filtered through enough into planning policy. A lesser echo of the same pattern of industrial growth proposed for the north and east will not only harm the area's landscape but is also a huge missed opportunity. Evidence shows that the high quality landscape and environment of Shropshire is a major factor for the wellbeing of its residents and a major draw to new investment and business in the area.

Section 4.12 states *"The approach also reflects the need to achieve a realistic growth strategy, and one which responds appropriately to the presence of environmental constraints, in particular the Shropshire Hills Area of Outstanding Natural Beauty (AONB) to the south of the County."* This is an example of how the AONB and a high quality environment is always portrayed in a negative light in planning documents, and the positive opportunities arising from this are missed. We would welcome working more closely with you, especially through the review of the AONB Management Plan over the next year to address this.

## 12. Please use the space below to make any further comments on this Consultation:

We note the reference to the Ironbridge power station site and would comment as follows:

The site is of high sensitivity, abutting the AONB at the western edge and the World Heritage Site to the east. A form of development which supports environment and heritage led regeneration is therefore to be preferred here. The layout and design of any proposed development should pay close attention to landform and environmental networks on the site, retaining features of value (e.g. woodland and mature trees), and making use of opportunities from the rolling terrain for some of the development to be relatively unobtrusive. Use should be made of open greenspace and new planting to help screen the development, provide a landscape and biodiversity buffer to the AONB and provide recreational benefits for the new residents. The potential should also be considered for secondary impacts on the AONB from an increased population in close proximity, such as increase in traffic, impacts on tranquillity, change in character from upgrade of roads, increased recreational use, etc. Design should minimise these impacts, and appropriate mitigation put in place. Account should be taken of the AONB Management Plan on these as well as landscape and visual matters. The development should provide some investment in green infrastructure and heritage assets in the area affected. This is a large site, on which some redevelopment of the current built footprint is likely to have relatively little impact on the AONB, and offers opportunities for improvements in landscape and amenity terms. However, the existing character and topography of the western agricultural part of the site, with north-facing slopes and ridges, would mean development on these areas would have a much greater impact. This would be greatest on the higher slopes and on the land west of the disused railway. Any proposals for significant built development on currently undeveloped land would be a very likely source of much contention and opposition in the community.

The document states that 'Shropshire needs to grow'. This is misleading and unclear – is it Shropshire's economy, population that needs to grow, or a veiled intention to reunite with Telford & Wrekin?

A49 corridor – the A49 cuts through the very centre of the AONB, and the AONB Management Plan highlights the A49 corridor as the least tranquil part of the AONB, with concerns about rising levels of traffic stimulated by growth elsewhere. This will have a negative effect on tourism through affecting precisely the sort of quality people come to the area to experience. The section of A49 within the AONB is relatively short, and tranquillity in the AONB should be taken fully into account. Speed is a major factor in traffic noise and whatever upgrades to the road as a whole are undertaken, speeds should be kept down on this short section.