

West Midlands Regional Spatial Strategy Phase Three Revision Options Consultation 29 June – 14 August 2009

Response from: Shropshire Hills AONB Partnership

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Critical Rural Services

Question CRC1: Studies have shown that it is very difficult to define rural services as “important” or “critical”, and that pursuing these definitions is unlikely to be of much value. Do you agree with this view?

Please tick one box Yes

If no, please provide reasons and a list of those rural services that you consider to be “critical”.

Question CRC2: The SQW Report identified significant service deprivation issues for people in “accessible rural” areas whose access to transport is limited (see page 21). Do you think more attention should be given to meeting the service needs of this group?

Please tick one box No

If yes, please provide reasons (and where possible, evidence) for your answer.

Question CRC3: Arguments have been put forward that new development should be allowed in settlements lacking a service base in order to reverse a cycle of decline in such places. (“Planning for Sustainable Communities” – CRC; “A Living and Working Countryside” – Taylor Review). Do you agree with this view?

Please tick one box Yes

If yes, please provide your reasons and any relevant evidence, including identified locations, and suggestions.

The Shropshire Hills AONB represents the extreme end of the spectrum on remoteness and sparsity of population within the region (the 23% of Shropshire which is the AONB has only 6.25% of the county’s population). Strict planning protection, coupled with low average earnings have exacerbated the problem of affordability of housing to some of the worst levels found in the country, and an unbalanced population with a high average age.

When the real sustainability of a high quality, but ‘managed’ landscape is taken into account, the flourishing of land-based industries and vitality of small settlements can be seen as intimately linked with the health of that landscape. The affordability of housing 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.

For these reasons the statutory Shropshire Hills AONB Management Plan 2009-14, formally approved by Shropshire Council and Telford & Wrekin Council, defines 'Keeping the Shropshire Hills countryside thriving' as one of its five strategic priorities. The Plan explicitly supports the analysis of the Taylor Review, saying

“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.”

Question CRC4: Three policy Options for rural service developments are suggested (see pages 22-23). Please state if you have a preferred Option, and the reasons for your preference.

Please tick one box Option 1: Sustainable – Climate Change Driven
 Option 2: Community Based
 Option 3: Status Quo

Please provide reasons for your preference

In line with our response to question CRC3 above, we feel the maintenance of services throughout the rural settlement hierarchy is important. We consider the issues of sustainability and climate change to be of paramount importance, but do not feel that a community-based approach need be at odds with this. Focussing service provision more exclusively towards larger settlements means that rural people have to travel to reach them. Strong rural communities will help to enable people’s needs of jobs, services and leisure to be met locally, 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. It is notable that many people living in rural areas choose to do so because of the perceived positive aspects of remoteness. Not everybody requires the same levels of services, and the important thing is to ensure accessibility for those most in need.

The desire through planning to limit private car travel to reduce CO2 emissions is supported, but the assumptions which go with this must not be too simplistic. A broad view of climate change adaptation and mitigation would include localising food and energy production, and enhancing community resilience. The sense of urgency required for imagination and new approaches to address these issues seems lacking in the Strategy’s analysis, 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 in the countryside is probably insignificant in this respect against the longer term gains of having people on the land and able to work it.

Question CRC5: For your preferred Option above please suggest how the Option might be delivered at the regional level, taking into account the relevant key issues and implications in the Critical Rural Services chapter.

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.

Gypsies and Travellers

This section has little bearing on the Shropshire Hills AONB, and the AONB Partnership has chosen not to respond to questions in this section.

Culture, Sport & Tourism

Question CST1: Which of the Options on page 53 do you think should be used as a basis of revising Policy PA10 Part A and why?

Please tick one box Option 1: Remove the portfolio
 Option 2: Update portfolio to include all regionally significant assets

If you have chosen Option 2, what assets (see B.O.P. report, item 11 on page 59) do you think should be added/removed and explain why you think they are or are not of regional significance.

The portfolio approach overstates the importance of major facilities and attractions. For many people in the region, more local assets will be of more significance in daily life. Equally, a sustainable approach to tourism will encourage people to explore the locality they are in, minimising travel and maximising experience.

Question CST2: Do you think that Policy PA10A should “protect”, as well as improve existing strategic cultural assets from development?

Please tick one box Yes No

If yes, please provide reasons for your answer and suggest how the WMRSS could protect the assets.

Cultural assets in particular may be harmed by inappropriate development, and the RSS could ensure that development takes account of potential impact on any assets affected directly or indirectly.

Question CST3: Which of the Options on page 57 do you think should be used as a basis for revising Policy PA10 Parts B and C to address any gaps in strategic culture, sport and tourism assets provision in the Region?

Please tick one box Option 1: Retain existing PA10 B & C
 Option 2: Update existing PA10 B & C
 Option 3: Develop a new policy in addition to PA10 B & C

If you have selected Option 2 or 3, what new criteria do you consider are important to add and why?

The social benefits of culture, sport and tourism are very important and this option would give greatest opportunity for them to be recognised. The potential for the countryside to provide an excellent asset for culture, sport and tourism should be emphasised. The social and economic benefits from this are of particular value in rural areas where other assets are often sparse. A modest scale of provision may be necessary to secure benefits from this, e.g. on-site interpretation, self-guided routes and information, appropriate events, but the cost of these is usually minimal compared to many larger scale facilities.

Question CST4: Do you agree with the strategic gaps identified in the Burns Owens Partnership (BOP) report? (see page 54).

Please tick one box Yes No

If no, are there any other strategic gaps which you consider exist and what evidence exists to support your case?

No particular view expressed, though the gaps identified focus too much on large facilities, as in answer to CST1 above.

Question CST5: Do you think the Options on pages 53 and 57 could help to address poor quality and access issues in relation to culture, sport and tourism assets?

Please tick one box Yes No

What suggestions do you have as to how the WMRSS can best address quality and access issues, and any others, which you might think are relevant for culture, sport and tourism? Please provide reasons (and where possible, evidence for your suggestions).

Provide greater support for the role of smaller and more local assets.

Quality of the Environment

Policy QE2 – Restoring Degraded Areas and Managing and Creating High Quality New Environments

This section has little bearing on the Shropshire Hills AONB, and the AONB Partnership has chosen not to respond to questions in this section.

Policy QE4 – Greenery, Urban Green Space and Public Spaces

Question ENV5: Do you agree with the list of issues a – f on page 67 that it is suggested Policy QE4 could include?

Please tick one box Yes No

Are there any suggested issues which a revised Policy QE4 should not include? If so, please tell us why you think these issues should be excluded.

Are there any additional issues which you think a revised Policy QE4 should include? If so, please tell us what issues you think should be included and why.

Policy QE5 – Protection and Enhancement of the Historic Environment

Question ENV6: Do you agree with the list of issues a – j on page 68 that it is suggested Policy QE5 could include?

Please tick one box Yes No

Are there any suggested issues which a revised Policy QE5 should not include? If so, please tell us why you think these issues should be excluded.

Are there any additional issues which you think a revised Policy QE5 should include? If so, please tell us what issues you think should be included and why.

Policy QE6 – The Conservation, Enhancement and Restoration of the Region’s Landscape

Question ENV7: Do you agree with the list of issues a – i on page 69 that it is suggested Policy QE6 could include?

Please tick one box Yes No

Are there any suggested issues which a revised Policy QE6 should not include? If so, please tell us why you think these issues should be excluded.

Are there any additional issues which you think a revised Policy QE6 should include? If so, please tell us what issues you think should be included and why.

Supporting text for the landscape policy needs make clear the broad, integrative and holistic concept which landscape is. In the structure of the document, Landscape sits alongside Biodiversity and Historic Environment as if these were somehow an equivalent level of consideration. In reality, landscape encompasses biodiversity and the historic environment, and needs to be seen as a more overarching section. This could be achieved by placing it second in the order, after the new QE1 Integrated Approach. A diagrammatic approach indicating the ‘layers’ of influence on a landscape is especially effective at conveying this idea. When landscape is placed on an apparent level with other more specific topics such as biodiversity and historic environment, it is much more often misinterpreted too narrowly as being only about visual aspects. This misinterpretation is commonly found in the planning system and is contrary to the approach outlined in the European Landscape Convention. The WMRSS should take an active approach to avoid and correct this misinterpretation.

The comments above are also relevant to the proposed placing of protected landscapes policy

within landscape. This is likely to exacerbate a commonly observed but unhelpfully narrow perception of what protected landscapes are about. The purposes of AONB designation are broad, as most recently defined by the Countryside Agency in 2001:

- *The primary purpose of designation is to conserve and enhance natural beauty.*
- *In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry, and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.*
- *Recreation is not an objective of designation, but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.*

It is notable that these purposes do not include the word 'landscape'. National Park purposes are similar, but with a recognised remit for promoting enjoyment and understanding. Recent thinking highlights the need to expand further the purposes of protected landscapes to recognise the broad range of benefits delivered by protected areas. A number of extracts below from Natural England's Draft Protected Landscapes policy July 2009 support this:

"There is now an increasing expectation that protected landscapes should help deliver a range of ecosystem goods and services including assisting species migration and habitat connectivity as well as increasing the public's enjoyment, contribute to sustainable development and further understanding, health and wellbeing, particularly targeting socially excluded individuals and groups. This will need to be achieved alongside the conservation and enhancement of the nationally important qualities for which protected landscapes are designated."

"This highlights a need to engage, demonstrate and promote how England's protected landscapes, through sustainable development, can deliver a wide range of conservation objectives alongside economic and social ones."

"Protected landscapes are capable of delivering more for the nation."

"A range of environmental and societal benefits flow from our landscape designation system, including links to public health, education and economic agendas. Society as a whole should reap even greater rewards from public investment in landscape and nature conservation. Widening the role of protected landscapes to maximise their contribution to deliver a healthy natural environment, opportunities for public enjoyment and benefit, and contribute to sustainable development should be vigorously explored."

"Important improvements to the way protected landscapes deliver environmental and social benefits can be achieved without recourse to amended legislation and we will explore all possible ways, within existing legislation, to help AONBs and National Parks push at the boundaries of their role."

While the broad, modern concept of landscape is useful in relation to the designation of protected areas, considerations of their management need to go broader still, to include economic activity, transport, tourism and communities, in a sustainable development framework. **We consider therefore that there is a strong case for the protected landscape policy element to be included within the new overarching environmental policy QE1 or preferably a new policy (see below), rather than here in landscape.**

The AONBs in the Malvern Hills, Wye Valley and Cotswolds cross regional boundaries, with parts of their areas being within the South West Region. The South West RSS, published in final draft

in 2008 contains a specific policy relating to protected landscapes. The Countryside Agency in national guidance on planning in relation to AONBs advocated that where AONBs cross administrative boundaries, policy should as far as possible be consistent throughout the AONB. **In common with other protected landscape organisations in the region, we would like to see a policy included in the West Midlands RSS that is consistent with that in the South West RSS.**

The South West policy is as follows -

Policy ENV3 Protected Landscapes

In Dartmoor and Exmoor National Parks and the 14 Areas of Outstanding Natural Beauty in the region, the conservation and enhancement of their natural beauty, wildlife and cultural heritage will be given priority over other considerations in the determination of development proposals. Development will only be provided for where it would:

- Conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park or Area of Outstanding Natural Beauty, or*
- Promote the understanding and enjoyment of the special qualities of the National Park, or*
- Foster the social or economic well-being of the communities within the National Park or Area of Outstanding Natural Beauty, provided that such development is compatible with the pursuit of National Park or Area of Outstanding Natural Beauty purposes*

Consideration will also be given to proposals which promote the understanding and enjoyment of the special qualities of the Areas of Outstanding Natural Beauty.

Particular care will be taken to ensure that no development is permitted outside the National Park or Areas of Outstanding Natural Beauty which would damage their natural beauty, character and special qualities or otherwise prejudice the achievement of National Park or Area of Outstanding Natural Beauty purposes.

Similarly, the South East Plan, published in May 2009 included the following specific policy on AONBs. The Cotswolds AONB is also partly within this region.

Policy C3: Areas of Outstanding Natural Beauty

High priority will be given to conservation and enhancement of natural beauty in the region's Areas of Outstanding Natural Beauty (AONBs) and planning decisions should have regard to their setting. Proposals for development should be considered in that context. Positive land management policies should be developed to sustain the areas' landscape quality. In drafting local development documents, local planning authorities should have regard to statutory AONB Management Plans.

In considering proposals for development, the emphasis should be on small-scale proposals that are sustainably located and designed. Proposals which support the economies and social well being of the AONBs and their communities, including affordable housing schemes, will be encouraged provided that they do not conflict with the aim of conserving and enhancing natural beauty.

Policy QE7 – Protecting, Managing and Enhancing the Region’s Biodiversity and Nature Conservation Resources

Question ENV8: Do you agree with the proposed targets for improving priority habitats set out in Annex C on page 123 and if not, why?

Please tick one box Agree with proposed targets Disagree with proposed targets

If you disagree, please provide reasons for your answer.

Question ENV9: Do you agree with the list of issues a – i on page 70 that it is suggested Policy QE7 could include?

Please tick one box Yes No

Are there any suggested issues which a revised Policy QE7 should not include? If so, please tell us why you think these issues should be excluded.

Are there any additional issues which you think a revised Policy QE7 should include? If so, please tell us what issues you think should be included and why.

The text should provide greater explanation of why regional habitat targets are included in the WMRSS, and what the contribution of planning might be to delivering these, as opposed to other types of mechanism (such as conservation ownership, agri-environment schemes and partnership/ community projects).

Question ENV10: Should the focus of Policy QE7 be mainly on the existing Biodiversity Enhancement Areas, or alternatively those areas identified in the Regional Opportunities Map (on page 72), and why?

Please tick one box Existing Biodiversity Enhancement Areas
 Areas identified in Regional Opportunities Map

Please provide reasons for your answer.

Though the Regional Opportunities Map may have some shortcomings (relating mostly to the comparability between counties of the data underlying it), it is a much more refined process than the relatively crude Biodiversity Enhancement Areas approach. It takes better account of the detailed distribution of biodiversity resources around the region and is a much better basis for the policy. An attempt should be made when the map is revised to correct the inconsistencies in mapping approach, as the extent of shading across Warwickshire compared to the Shropshire Hills seems unjustified when data on biodiversity assets are examined. The definition of the term ‘Landscape areas’ (as found on the accompanying page in the Background paper) should be included with the map on page 72. Without it the meaning of this term is unclear, and indeed confusing given that this is within the biodiversity rather than landscape section of the document.

Policy QE8 – Forestry and Woodlands

Question ENV11: Do you agree with the list of issues a – i on page 73 that it is suggested Policy QE8 could include?

Please tick one box Yes No

Are there any suggested issues which a revised Policy QE8 should not include? If so, please tell us why do you think they should be excluded.

Are there any additional issues which you think a revised Policy QE8 should include? If so, please tell us what issues you think should be included and why.

Protection of Agricultural Land

Question ENV12: Do you agree with the list of issues a – f on page 74 that it is suggested that the text relating to the Protection of Agricultural Land could include?

Please tick one box Yes No

Are there any suggested issues which revised text for Protection of Agricultural Land should not include? If so, please tell us why you think these issues should be excluded.

The title 'Protection of Agricultural Land' makes this section hard to place within the structure of the document. The greatest value of agricultural land is in production of food and other products - a social and economic benefit of great importance to sustainability, especially in the context of climate change. While reference needs to be made to the environmental value of farmland, this section perhaps does not belong in the Environment chapter, and may be better titled 'Food and Agricultural Production'.

Are there any additional issues which you think revised text on the Protection of Agricultural Land should include? If so, please tell us what issues you think should be included and why.

Further explanation is needed on some of the issues, e.g. a) the importance of agricultural land regionally, especially for food security; f) variations in agricultural importance, including upland areas which may be more marginal economically, but where livestock farming is of great social and environmental importance.

Policy QE9 – The Water Environment

Question ENV13: Do you agree with the list of issues a – i on page 75 that it is suggested Policy QE9 could include?

Please tick one box Yes No

Are there any suggested issues which a revised Policy QE9 should not include? If so, please tell us why you think these issues should be excluded.

Are there any additional issues which you think a revised Policy QE9 should include? If so, please tell us what issues you think should be included and why.

Air Quality

Question ENV14: Do you agree with the list of issues a – d on page 76 that could be included in text relating to Air Quality?

Please tick one box Yes No

Are there any suggested issues that you think should not be included in revised text for Air Quality? If so, please tell us why you think these issues should be excluded.

Are there any additional issues which you think revised text for air quality should include? If so, please tell us what issues you think should be included and why.

Integrated Approach to the Management of Environmental Resources

Question ENV15: Do you agree with the list of issues a – i on page 79 that it is suggested Policy QE1 could include?

Please tick one box Yes No

Are there any suggested issues which a revised Policy QE1 should not include? If so, please tell us why you think these issues should be excluded.

Are there any additional issues which you think a revised Policy QE1 should include? If so, please tell us what issues you think should be included and why.

The concept of an over-arching policy on Integrated Management of Environmental Resources is a good one. The list of issues includes many of the important elements, but the overall clarity of the section could be improved. Examples of delivery mechanisms under issue (i) would aid understanding.

The placing of this section in the consultation document is confusing. As the over-arching environmental policy it should be placed at the beginning of the Quality of the Environment section. As outlined above under ENV7, this policy should include the main policy reference to protected landscapes, which represent areas where a particular concentration of benefits derive from a high quality environment.

Question ENV16: Which Option on page 79 would you prefer Policy QE1 to follow, and why?

Please tick one box Option 1: Environment Led
 Option 2: Development Led
 Option 3: Spatial Strategy

Please provide reasons for your answer.

As an environmental policy, this options seems most likely to deliver. The Development Led option would not give adequate recognition to the high quality assets of the region. The explanation of Option 3 is unclear, and the reasons behind the implications cited for all three options are not clear, even after reading the background paper. The clarification of delivery mechanisms mentioned above may help with this.

Flood Risk

Question ENV17: Do you agree with the suggested list of issues a – l on page 84 that a new Flood Risk Policy could include?

Please tick one box Yes No

Are there any suggested issues which a new Flood Risk Policy should not include? If so, please tell us why you think these issues should be excluded.

Are there any additional issues which you think a new Flood Risk Policy should include? If so, please tell us what issues you think should be included and why.

This section needs to be tied more closely to the Water Environment section, or may perhaps be better combined within it. Issues c) and i) on catchment-wide flood management and appropriate land management are particularly important. Further attention needs to be given to how these can be delivered. They are not new ideas, and represent the common sense approach of tackling cause rather than effect, but recent practice seems if anything to have veered further away from this approach more towards reactive hard defences.

Energy

Question ENV18: Do you think that Policy EN2 in the existing WMRSS should be revised to encourage improvements to the energy efficiency of existing buildings as opportunities arise?

Please tick one box Yes No

Please provide reasons for your answer, including any views you may have on how a regional policy on energy

efficiency could be implemented.

Improving the energy efficiency of existing buildings is crucial to achieving carbon emissions targets. All possible levers should be used to support this, e.g. making grants conditional on the conduct of an energy audit and the carrying out of actions according to the energy hierarchy.

Question ENV19: Which of the Renewable Energy Target Options do you think should be used in the WMRSS to promote the development of renewable energy and low carbon technologies in the West Midlands? (see page 90).

Please tick one box Option 1: Adopt national target for renewable energy
 Option 2: Adopt Regional Energy Strategy targets for renewable energy
 Option 3: Sub-regional targets for renewable energy

Please provide reasons for your answer.

The Regional Energy Strategy targets pre-date the Climate Change Act mandatory CO2 emissions targets of 80% cut by 2050, and are almost certainly not challenging enough. However the 2010 milestones of either the national or regional target are unattainable from the position now in 2009, and the focus should now be on 2020 targets. The variation in renewable energy potential between sub-regions is probably not significant enough to justify Option 3. If the case can be made that the region has significantly less potential for renewable energy than other parts of the country, a target less than the national one could be justified. For the region to maintain a pro-active stance on climate change however, this may need to be balanced by a higher than average target for carbon savings from energy efficiency.

Question ENV20: Do you think that the WMRSS should set regional targets for specific renewable energy and low carbon technologies such as biomass, combined heat and power (CHP), ground source heat, landfill gas, solar, wind etc?

Please tick one box Yes No

Please provide reasons for your answer.

Regional targets would give a strong steer on the appropriate mix of technologies for the region. In a situation where many members of the public are wary of renewable energy developments, it would provide additional support to help secure those developments which do represent the most appropriate means of generating renewable energy in the region.

Question ENV21: Do you think that the WMRSS should retain the existing Policy EN1 on Energy Generation (Option 1) or should it set out clear regional criteria to assess whether planning applications for renewable energy and low carbon technologies are appropriately located (Option 2)?

Please tick one box Option 1: Retain existing Policy EN1
 Option 2: Criteria-based policy to ensure that renewable energy is appropriately located

Please provide reasons for your answer. If you answered Option 2, please also answer Question ENV22.

In this rapidly developing field, greater clarity is needed.

It is agreed that 'areas with national designations in particular need to be protected from inappropriate development'. However, the key test proposed of 'the extent to which they (proposals) might affect the integrity of the designation' is very far from clear. In the case of an AONB, the designation is a legal process which it is hard to see any single development overturning (if this is what is meant by 'affecting the integrity'). It is the qualities of the area which would be affected more than the designation itself, and with a range of human influences found already, impacts will be by degree and the concept of integrity is a difficult one to apply.

The analysis and policies in the 'Shifting to Low Carbon' section of the new Shropshire Hills AONB Management Plan may be helpful in moving forward regional policy, but it should also be noted that Natural England is engaged in national policy work in relation to wind energy, with particular relevance to protected landscapes.

Question ENV22: If you think the WMRSS should include clear criteria for assessing applications for renewable energy and low carbon technologies (Option 2 above) please tell us which are the most important factors in assessing where renewable energy and low carbon technologies would be most appropriately located. Please rate each factor on a scale of 0 - 5.

Score (0 is not important, 1 is the least important and 5 is the most important).

Contribution to the global environment

Contribution to the local economy

Impact of fauna, flora and animal life

Noise

Odour

Traffic Implications

Visual Impact

Other factor(s) (please specify below)

Effectiveness of the technology and overall carbon benefit could be added. Subject to other considerations, renewable energy should be located as far as possible where it will be most effective, or else a higher level of development overall will be needed. This may have similar meaning to the first criterion of 'Contribution to the global environment', but is clearer.

Community benefit should also be included, alongside contribution to the local economy. There is plenty of established good practice on the benefits of integrating renewable energy with community benefits.

The criteria identified are on the whole appropriate, but it is felt that a simple scoring process is too crude. The relative weight attached to different criteria may need to vary according to the setting, e.g. in an AONB greater consideration should be given to visual impact, in a tranquil area or close to population greater consideration to noise, etc.

Positive Uses of the Green Belt

Question ENV23: Should the WMRSS develop a policy to secure positive use and improvements of the Green Belt and urban fringe (Option 1), or rely on the guidance in national Green Belt policy (PPG2) and the environmental enhancement policies (Option 2), and why?

Please tick one box Option 1: Develop a Regionally Specific Green Belt Policy
 Option 2: Apply PPG2

We note the numbering of options here is different to that in the consultation document. We have chosen Option 1 with the text against it as shown here.

Please provide reasons (and where possible, evidence) for your answer.

As indicated, the Green Belt has a wide range of sustainability benefits and needs positive management to deliver these.

Minerals

The AONB Partnership has opted to respond only on Question M6 in this section.

Question M6: Do you think that minerals resources should be safeguarded in areas covered by national designations for landscape, wildlife conservation and cultural heritage?

Please tick one box Minerals resources should be safeguarded in designated areas
 Minerals resources should not be safeguarded in designated areas

Please provide reasons and where possible provide evidence for your answer.

Safeguarding mineral resources does not necessarily imply working of these minerals within a foreseeable time frame. Minerals are mostly sterilised by other forms of development. This is less likely within a designated area, but if anything the safeguarding of minerals may reduce the threat to the designated area from other forms of development.