

Shropshire Hills AONB Partnership

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Dear Jake

Site Allocations and Management of Development DPD Issues and Options consultation

I am pleased to attach for you the response of the Shropshire Hills AONB Partnership to the above consultation.

You will note that overall, the Partnership still has significant concerns that the AONB is not being adequately differentiated in the emerging policy approach of the Shropshire Local Development Framework. We propose a number of ways in which this can be improved, and will be happy to work closely with the Council on further development of relevant parts of the DPD.

The Partnership is a Joint Advisory Committee established by Shropshire Council with other parties specifically to advise in relation to conservation of the AONB and its other purposes. We trust therefore that this detailed response, endorsed in draft by a meeting of the Partnership earlier this week, will be given due consideration and weight.

Yours sincerely

George Chancellor
Chair

Shropshire Hills AONB Partnership response to Site Allocations and Management of Development DPD Issues and Options consultation, 25 June 2010

This response has been prepared by officers from the Shropshire Hills AONB Partnership staff team and a draft of it was considered and endorsed at a full meeting of the AONB Partnership itself on 22 June 2010. Comments relate to the purposes and geographical extent of the AONB designation, and are closely based on principles put forward in the Shropshire Hills AONB Management Plan 2009-14, formally approved in 2009 by Shropshire Council. The response relates to a number of Local Joint Committee areas into which the AONB falls, as summarised below:

20. Stretton Dale	Wholly within the AONB
19. Bishop's Castle, Chirbury & Worthen & Clun	Mostly within the AONB
24. Craven Arms & Rural	More than half within the AONB
16. Burnell & Severn Valley	Small part within the AONB
21. Much Wenlock, Brown Clee & Highley	Small part within the AONB
25. Ludlow & Clee Hill	Small part within the AONB
26. Cleobury & Rural	Small part within the AONB
9. Longden, Ford & Rea Valley	Very small part within AONB

The nature of comments also reflects the AONB Partnership's role and involvement. Hence comments on Part A are focussed on the South Shropshire zone and Church Stretton; comments on Part B are fairly generic and do not address specific sites or settlements, on which local communities are better placed to comment; comments on Part C reflect areas of overlap for policy with the AONB remit and the Management Plan. The AONB Partnership's Planning & Landscape Officer Glynn Barratt attended LJC area meetings considering the consultation in Ludlow, Cleobury Mortimer and Church Stretton as an observer. It was clear in each of the meetings attended that the local communities were taking an active and robust interest in the consultation.

Overall, the Partnership still has significant concerns that the AONB is not being adequately differentiated in the emerging policy approach of the Shropshire Local Development Framework. AONBs are deemed in national government policy to have equal landscape value and protection to National Parks (statement by Nick Raynsford to House of Commons, 2000). It is hard to envisage a National Park been given such a low profile and differentiation within a Local Development Framework. **The Partnership urges the Council to make greater recognition and allowance for the AONB designation in planning policy, in line with its legal duty under S85 of the Countryside & Rights of Way Act 2000 to 'have regard to the purposes of AONB designation'.**

PART A TOWNS

Question A1: How do you think housing development should be distributed between the towns and key centres in your area?

Our response to this question is based on both the principle of distinguishing the AONB, and the reality of the situation in Church Stretton, which is the only town designated as a 'Market Town or Key Centre' within the AONB, and is therefore the only town in Shropshire within a nationally protected landscape. **We strongly contend that Church Stretton should be allocated only minimal or modest levels of housing development.** We accept that the total housing allocation for the zone is decided, but do not express a view

on how the remaining numbers should be allocated between the other towns in the South Shropshire zone, which all lie outside the AONB.

The South Shropshire Part A section of the final SAMDev document should refer to the fact that Church Stretton lies within the Shropshire Hills AONB. As described above, the particular geography of Church Stretton provides further justification for an approach of minimal or modest development. The constraints of topography here are no coincidence – this is indeed the only town within the AONB precisely because of its position in the heart of the hills, and the importance of the landscape to its setting. Church Stretton is located in a narrow valley between two lines of hills. The extent of the current built area means that future development is likely to be highly visible encroaching onto the hillsides or undesirably placed on the flood plain.

The map provided on page 10 of the consultation document for Stretton Dale LJC demonstrates these natural constraints to development. The lack of level building sites in the town, which sits between the flanks of two major hill ranges, has concentrated major development in the valley bottom. As the pressure for development has increased in recent years, building has taken place on the margins of the hills to the east of the A49, affecting the views out from the town and perspectives of the town from the Long Mynd, further such development in this direction is considered undesirable.

The second major constraint arises from drainage considerations, much of the land to the west of the A49, throughout the length of the Stretton valley, is prone to flooding. This can be clearly seen in the extent of the flood zone shown on the directions for growth map (p10 Stretton Dale consultation document). This susceptibility to flooding arises from the close proximity of the town to the watercourses that drain the Long Mynd and flow eastwards through the batches (valleys) to join streams which flow into the Severn and Teme catchments. The increasing likelihood of heavy rainfall events similar to those in 2007 & 2008, in line with climate change predictions, will without landscape sensitive mitigation lead to this type of event repeating on a regular basis.

Church Stretton's character has been adversely affected by the scale and style of some recent development, and **it is imperative that the sensitivities of Church Stretton's location within the AONB are fully taken into account.** This concern is shared by the town's Civic Society and Town Council with whom the AONB Partnership is in consultation. We acknowledge the need for the town to remain sustainable in terms of housing (especially affordable housing), opportunities for employment and balance of population, but feel that this should be possible within minimal or modest development scenarios.

The Council's Sustainability Appraisal accompanying the consultation acknowledges that for Church Stretton:

"high development levels increase the likelihood of a negative effect on both water resources and the landscape character and visual amenity of the Shropshire Hills AONB. Lower levels of development are likely to have the least impact on Church Stretton's designated historic, wildlife and geological assets, should deliver the highest percentage of development on previously developed land and may mean that drainage is easier to manage."

Given the requirement to give the AONB a high degree of consideration, it is therefore hard to see how high levels of development for Church Stretton could be justified. We would question some of the apparently conflicting statements also found in the Church Stretton section of the Sustainability Appraisal:

“Higher levels of development are likely to be able to offer the most resources for new and/or improved community and healthcare facilities and the positive management of natural and historic assets. An increase in inward investment, greater efficiencies in water and material resource use, increased rail usage and better economies of scale in road transport are also possible at higher development levels. These factors may offset carbon emissions which are likely to rise in line with development.”

Question A2: What scale of employment development do you think would be appropriate in each town in South Shropshire, over 2006-2026?

In line with the approach outlined above, **the allocation for Church Stretton should be for minimal or modest employment development.** As before, we do not express a view in relation to the other towns which lie outside the AONB.

Question A3. What are your priorities for local infrastructure investment in each town, in association with development?

In relation solely to Church Stretton, we are aware of the Town Council’s view of the inadequacy of drainage infrastructure, and also for their aspirations for both a visitor centre of some sort in the town and a public transport hub facility, both of which fit well with preferred approaches to sustainable tourism in relation to the AONB. The potential to pursue these things linked to any future development should be explored.

It is unclear whether this section encompasses ‘Green Infrastructure’, but this needs clearer consideration somewhere in the process. This is especially important since some sites put forward as potential for development are in fact important elements of the Green Infrastructure of the town. Enhancing the wildlife and relatively ‘natural’ landscape value of wetland and flood prone areas will be a particular priority in the Stretton valley. The Town Design Statement also highlights the importance of trees in Church Stretton’s landscape, and maintaining this will require ongoing investment in both the care and maintenance of existing trees and new planting.

PART B DEVELOPMENT AND PRIORITIES IN LJC AREAS

The AONB Partnership supported the concept of ‘Rural Rebalance’ in the Core Strategy consultations, and of Community Hubs and Clusters. The number of settlements within the AONB under consideration in this part of the consultation is large, and the AONB Partnership is not well placed to make detailed comments on these.

In relation however to our support for minimal development for Church Stretton, we note in particular the potential for the Hub and Cluster approach to take pressure off the town, while meeting needs within the Stretton Dale LJC area, and potentially benefiting the sustainability of some smaller settlements by enabling them to grow.

The Vision of the AONB Management Plan is that: *“The natural beauty of the Shropshire Hills landscape is conserved, enhanced and helped to adapt by sympathetic land management, by co-ordinated action and by sustainable communities; and is valued for its richness of geology, wildlife and heritage, and its contribution to prosperity and*

wellbeing.” The AONB designation “*is seen as not about preventing change, but managing change in a positive way*”, (AONB Management Plan 2009 p4). This is broadly compatible with the Shropshire Council’s Core Strategy concept identified under the title of ‘Rural Rebalance’, characterised in the quoted section below.

“Market forces have led to very high house prices in rural areas in relation to the local economy, and lifestyles that depend on services that are not provided locally. While planning cannot fully overcome market forces and personal behaviour, it can have a powerful effect. It can help protect the special character of Shropshire’s rural settlements, and influence the type of development. It can seek to ensure that rural settlements do not stagnate and decline, but instead meet the needs of their communities, particularly the needs of younger households and those on lower local wages. It assists in improving the provision of services, facilities and infrastructure available in smaller settlements. These are important elements of the “rural rebalance” referred to in Policy CS1 Strategic Approach.
(Shropshire Core Strategy 2010 p62 para 4.56).

Enabling rural communities to become more sustainable and thrive as living and working communities requires investment from both public and private sources. Sensitively designed development that reflects the needs of the local community, and contributes towards much needed infrastructure and affordable homes for local people, has an important role to play in reinvigorating rural communities, and in reducing carbon emissions by maintaining local services and reducing the need to travel. Development that contributes to economic vitality includes development referred to in Policy CS13, including home-based enterprises.
(Shropshire Core Strategy 2010 p62 para 4.56).

The Rural Economy

We would support policies, as the consultation suggests, which support local enterprise, existing businesses and agricultural enterprises, but **these policies must take adequate account of the AONB, differentiating it from other parts of the county.** We note in particular the recent rise in applications for very large sheds for poultry enterprises classified as ‘free range’, and the apparent unwillingness by the authority in planning decisions to draw lines as to what scale of agricultural development may be unacceptable within the AONB.

Potential directions

As outlined above, we do not make any comments on specific sites for Church Stretton, the only settlement mapped in the consultation within the AONB, though we may do so at later stages of consultation on Site Allocations. At this stage we would merely reiterate the need for strong application of environmental principles to site allocation, including avoiding flood prone land, wildlife and heritage value, and taking into account the landscape setting and visibility of possible development. The AONB Partnership co-ordinated work in partnership with the District Councils during 2007-8 on landscape sensitivity and capacity mapping related to potential development sites in selected settlements, and we trust that this work will be fully utilised in assessing potential sites highlighted in the current consultation.

PART C MANAGING DEVELOPMENT AND CREATING SUSTAINABLE COMMUNITIES

A number of the policy themes outlined in the consultation have particular links to the remit of the AONB, including:

- Sustainable design
- Supporting tourism
- Development in the countryside
- Protecting the countryside and environmental networks
- Renewable energy
- Sustainable water management
- Minerals and waste development

We would stress again here the need to differentiate the AONB in development of county-wide policies in these areas. In particular we note the discussions held about the place for an equivalent to the policies specifically about the AONB formerly contained in Local Plans. Accepting that in Shropshire the Core Strategy may have been too high a level document for this, we would argue strongly for the inclusion of a specific AONB policy in this DPD. (Such a policy should probably come under the 'Protecting the countryside and environmental networks' heading). **If specific guidance on the AONB is instead left to the lesser status of a later Supplementary Planning Document, the new LDF is likely to end up having weakened protection for the AONB.**

The approach we propose would fit with Para NE8.5 of the consultation on a new Planning Policy Statement: Planning for a Natural and Healthy Environment (CLG, 2010), which states:

"Nationally designated areas, comprising National Parks, the Broads and AONBs, have the highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty of these designated areas should be given great weight in planning policies and decisions." The wording here, including 'policies' clearly implies that AONBs should be recognised in LDF policies. Indeed we are aware of other examples from the region where AONBs have been recognised specifically in policies at Core Strategy level.

The AONB Management Plan 2009–14 approved by Shropshire Council puts forward policies and positions of the AONB Partnership which have been screened to avoid duplicating Core Strategy, Regional or National policies, and which therefore give a clear idea of the policy approach the DPD should take in relation to the AONB. We would welcome the opportunity for any involvement in the development of any relevant policies. Policies and Positions from the AONB Management Plan which are particularly relevant to the policy headings in the consultation are reproduced below:

Type and affordability of housing

AONB PARTNERSHIP POSITION 6 Where market priced housing is used to generate finance for affordable housing within the AONB, it is preferable that the market priced housing is outside the AONB.

AONB PARTNERSHIP POSITION 7 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.

Sustainable design

POLICY 5. Small scale quarrying to supply local materials for restoring traditional buildings and structures is supported, subject to careful consideration of environmental factors, including the conservation value of former quarries where these may be reopened.

[The DPD should also make reference in this section or elsewhere to having regard to approved Town and Village Design Statements, and support for further development of these].

Developer contributions to infrastructure

POLICY 9. Exceptionally where a significant adverse impact associated with development cannot be avoided, appropriate mitigation measures including habitat creation or community benefits, should be sought.

Supporting tourism

POLICY 10. The siting, design and specification of new developments for tourism and recreation should be to high standards of environmental sensitivity and sustainability. The following guidelines are recommended:

- Single developments of more than around ten accommodation units are less likely to be supported in small settlements and open countryside.
- Large parks of static caravans, cabins or chalets are likely to be intrusive. Smaller sites with good landscaping are preferable, and facilities for touring caravans and camping generally have a low impact as there are fewer permanent structures.
- Built facilities for recreation should only be allowed where their location and the activities they support are compatible with the special qualities of the AONB.

POLICY 13. The provision of any new public car parking should be in scale with the setting and capacity of roads used to reach the location. Larger car parks should generally be situated nearer to settlements or larger roads. Where informal roadside parking is improved to alleviate traffic problems on smaller roads, care should be taken to avoid adding to traffic levels. Design should be appropriate to a rural setting, e.g. stone surfacing, use of timber for edging and signs.

POLICY 26. Countryside attractions and walks should be linked where possible to settlements where services and public transport facilities exist and can be promoted, helping to maximise economic benefits, especially from day visitors.

POLICY 27. Tourism activities which draw on the special qualities of the area without harming them should be especially encouraged. This may include development of access infrastructure (e.g. off road cycle routes, rights of way), use of public transport, historic and natural sites, interpretation to help aid understanding, enterprises based specifically on the special qualities of the AONB (e.g. wildlife watching, landscape painting, walking festivals) and cultural events.

AONB PARTNERSHIP POSITION 2 An approach of smaller, low-key tourism developments designed in sympathy with local character will blend better into the area and spread economic benefits more widely than larger facilities. Tourism businesses will be supported to take a sustainable approach and encourage their visitors to do likewise.

Development in the countryside

POLICY 4. Farm diversification enterprises need to be in harmony with environment and not degrade this resource, which also provides an important economic asset for the future. The impact of business-related traffic to and from the property will be an important consideration, including cumulative effects.

POLICY 8. Design of new agricultural buildings including location, structure and materials should be of a high standard appropriate to the AONB. Efforts should be made to improve existing buildings where these are of a poor standard.

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.

[The AONB Partnership is in the final stages of preparing a guidance document on design of agricultural buildings in the AONB. The potential to link this to the LDF by referencing it in this section of the DPD or elsewhere should be explored].

Protecting the countryside and environmental networks

POLICY 18. Tranquillity should be taken fully into account in both strategic and specific decisions. Proposals having a significant impact on tranquillity in the AONB should be prevented where possible.

POLICY 20. A principle of 'quiet enjoyment' should apply, and activities which are in keeping with this encouraged. Recreation activities which are inherently noisy or intrusive should be discouraged, and where possible prevented, e.g. facilities for such activities not allowed through the planning system.

POLICY 38. Pro-active adaptation to climate change, focusing on wildlife and natural processes, is essential to retaining the natural beauty of the AONB and must be given a high priority.

POLICY 39. Existing areas of high quality habitat must be retained, and networks developed of higher quality habitat through targeted improvements on privately owned land.

Renewable energy

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 carbon 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.

POLICY 30. Renewable energy developments in the AONB should generally be of a small scale appropriate to local use. Larger scale energy developments will be more suitable outside the AONB, e.g. linked to market towns where transport links are better, closer to larger scale demand, etc.

POLICY 31. Small scale domestic renewable installations (e.g. solar panels) are encouraged and AONB designation should not be used as a reason against these. The design and installation of these should take account of visual amenity. Greater sensitivity may be required in Conservation Areas and on Listed Buildings, but even in these circumstances, effort should be made to enable energy benefits to be achieved.

POLICY 32. Biomass energy based on existing resources in the area, such as woodfuel and agricultural by-products, is particularly compatible with the AONB and is strongly supported.

POLICY 33. Establishment of energy crops should avoid harm to biodiversity, water quality and availability, and where larger and longer-lived than normal agricultural crops, should take account of visual amenity (e.g. following forestry design guidelines regarding scale and shape of compartments including in relation to landform, structural diversity and edge treatments).

POLICY 34. There should be no development of wind turbines (other than in accordance with permitted development rights) within the 'High Open Moorland' and High Volcanic Hills and Slopes' Landscape Types in the AONB.

POLICY 35. Proposals for wind turbines and associated infrastructure within the AONB should take account of factors including landscape character, visual amenity, biodiversity, heritage and recreation, and the following guidelines:

- Within 100m of buildings (excluding Listed Buildings and Conservation Areas), one or two wind turbines of up to 12m to blade tip are likely to be acceptable within the AONB.
- Turbines of over 25m to blade tip, or groups of more than two turbines, are not likely to be acceptable within the AONB.
- Wind turbine proposals should be linked to local energy needs and energy conservation measures. Community benefits should relate to energy in preference to amenity or other measures.

POLICY 36. Decisions on proposals for wind turbines and associated infrastructure outside the AONB should take account of the potential impacts within the AONB, especially the extent of visibility and significance of viewpoints affected, and potential cumulative effects with existing structures.

AONB PARTNERSHIP POSITION 8 The Partnership supports community low carbon initiatives and will take a view of wind turbine proposals based on a range of sustainability criteria as well as visual aspects.

AONB PARTNERHIP POSITION 9 Land within 5km of the AONB boundary is unsuitable for large scale windfarm development, and should be excluded from any Search Areas. (The definition of 'large' used in this Position is that used by TAN 8, i.e. developments of 25MW and over).

AONB PARTNERSHIP POSITION 10 The Partnership supports permitted development rights for appropriate micro-generation, but believes the current moves to extend permitted development rights could allow some wind turbine developments which would have an unacceptable impact on the landscape of the AONB. The Partnership does not support permitted development rights in the AONB for multiple micro wind turbines and for those sited away from existing development (e.g. further than 100m from buildings), and if these are introduced, will work with the planning authorities to explore the case for an Article 4 Direction.