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Shropshire Council
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Abbey Foregate
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26th April 2017

Dear Ms Davies

Shropshire Draft Economic Growth Strategy 2017-2021 - consultation

The Shropshire Hills AONB Partnership welcomes this opportunity to comment on the draft Economic Growth Strategy. The AONB Partnership is a formal Joint Advisory Committee to Shropshire and Telford & Wrekin Councils regarding the statutory AONB designation and its purposes, and our response relates to this role, and does not therefore cover all aspects of the Strategy or consultation.

The Shropshire Hills AONB Management Plan is a statutory document formally approved by both Councils to set out their '*policy for the management of their area of outstanding natural beauty and for the carrying out of their functions in relation to it*' (Countryside & Rights of Way Act 2000, s89). The Economic Growth Strategy must therefore take account of the Management Plan, and we highlight certain relevant sections below.

Overall comments

The AONB is a huge economic asset to Shropshire, and both the qualities of the landscape and activity which is in harmony with the landscape can be major drivers for the county's economy. By national standards however, Shropshire appears to undervalue its AONB, and therefore limits the realisation of its economic potential. We regret to note that the AONB is not mentioned in the Strategy.

Relevant extracts from the Shropshire Hills AONB Management Plan 2014-19

Summary of condition and trends

The character and quality of the Shropshire Hills landscape continue to be of high importance, but are under increasing pressure, and the condition of a number of the special qualities of the AONB is declining. Improvements resulting from conservation activity, e.g. on Sites of Special Scientific Interest and through agri-environment schemes, are accompanied by wider declines in biodiversity, especially bird, plant and invertebrate populations. Land management practices

remain a crucial determining factor, while economic forces are increasing development pressure and reducing resources for positive management, leading to more deterioration of features by neglect.

Business activity within the AONB itself is strongly focused on land management and associated industries, plus tourism and services. The environmental resources of the AONB are increasingly recognised as important to businesses in the surrounding market towns, but appear to be undervalued in some areas of decision making.

The following key issues facing the Shropshire Hills have been identified as the most significant in the Plan period:

Development and the Economy

Schemes which may generate economic benefits in the short term have to be balanced with the longer term sustainability of the area. Housing appropriate to local need, tourism and business development are required to allow rural communities to survive, but these need to be of a scale, design and quality which complements the special qualities of the AONB. The economic downturn means there is a progressive decrease in public sector resources available for all kinds of work in support of the AONB.

The Future of Farming

Livestock farming in particular is vital to maintaining the character of the Shropshire Hills, and farmers need support to adapt to changing subsidy regimes and to use and nurture environmental quality as a valuable asset. Developing local supply chains and an emphasis on environmental quality will be crucial.

Climate Change

Ecological networks need to be strengthened to improve their resilience, and mitigation measures put in place for wildlife and habitats which are unable to adapt. Farming, infrastructure and communities will also need to adapt to changes in the climate, the economic and political consequences of which are very uncertain. The area needs to play its part in shifting to a low carbon economy and way of life, conserving energy and developing appropriate small-scale renewables.

Transport

High levels of travel on roads and in the air uses scarce resources and erodes tranquillity. Further incentives are needed to influence patterns of employment and leisure, and offer viable alternatives, including reduced travel and use of public transport.

In relation to economic development, the AONB is very interlinked with the surrounding area and especially the market towns close by. The economic and social inter-relationships between towns and their rural hinterlands need to be strengthened, and this is a key theme of Shropshire Council's Place Plans. The geography of many market towns lying just outside the AONB, and all of them having substantial rural hinterland outside the AONB, means that there are often local opportunities to accommodate developments which would not be suitable within the AONB itself.

The Wider Rural Economy

The landscape is much more than a scenic backdrop to business and local life. The AONB is a living, working area with specific characteristics and needs distinct from the rest of Shropshire by virtue of its upland character and sparse population.

Enterprise, innovation and skills are major factors in economic development, and the local situation with these factors needs to be taken into account. Opportunities at the lower income end of the skills range, including land-based activities, will be important in addition to higher value activities. Effort will be needed to retain traditional skills for managing landscape features such as hedge laying, dry stone walling and timber-framed building.

As well as handing on old skills, new commercial skills will also need to be developed if farmers are to get more involved in the supply chain. Support should be made available for farmers to work together to plan for the future, and to build alliances with other interests including environmental groups and the wider community. Relevant training should be promoted to maintain and develop skills that support AONB priorities, including land management and traditional crafts, sustainable business and environmental knowledge.

Access to training is also an important factor, and different methods may be needed in rural areas to ensure that opportunities reach the right people. There is a particular need to encourage retention of young people in rural areas. A range of opportunities, including added-value activity in the land-based sector will be appropriate for this.

Comments on specific sections of the draft Strategy

Vision and targets

We welcome the prominent recognition of the natural environment in this section, and the statement that “*We won’t lose sight of these wonderful assets and will continue to nurture them to ensure the quality remains*”. There appears to be little however in the pages that follow that recognises the need to invest in these environmental assets, or indeed the potential conflicts of some economic activity promoted, with the quality and value of these assets. These issues should be addressed transparently in a Strategic Environmental Assessment of the draft Strategy.

There is considerable expertise now nationally in recognising and valuing ‘natural capital’, and Shropshire is proving itself to be behind in not addressing this in the draft Strategy. The natural capital approach provides important and robust economic mechanisms for taking into account the condition of assets as well as the blunt indicator of GVA, as used in the Strategy’s targets. To illustrate - an individual household could increase its income by selling the tiles off the roof. This might harm the capital value of the house, constrain other economic activity and harm quality of life, but a GVA measure would still register it as positive progress. At a county level, mechanisms are needed to ensure that blinkered, economically unsound decisions of this kind are not made, and the Strategy should set these out.

Priority Action 1: Target actions and resources on Economic Opportunities

We welcome the proposed action to prepare a coherent visitor economy strategy. We operate and Chair the Shropshire Hills and Ludlow Destination Partnership, working with

Shropshire Hills Tourism. This is one of the recognised Destination Management Organisations in the county, and its area accounts for around half of Shropshire's visitor economy. The Destination Partnership will over the coming months be renewing its Sustainable Tourism Strategy, and we would welcome better liaison over tourism at a county level, which has historically been poor. The Shropshire Hills is one of only 16 of the UK's 61 protected landscapes (National Parks and AONBs) to hold the Europarc Federation's Charter for Sustainable Tourism. This accolade recognises effective joint working between the tourism industry and the protected area body, to ensure that tourism draws on the special qualities of the area without harming them, and delivers the maximum benefits to local people. We look forward to active involvement in preparation of a county visitor economy strategy. The recent reductions in Shropshire Council's capacity to support and work with tourism are, we believe, short sighted given the importance of this sector to the county.

We welcome the statement "*We will pay particular regard to the implications of Brexit to specific sectors, notably the agricultural sector*". Currently EU-based schemes of support for agriculture are crucial to the delicate balance between farming and the environment on which the AONB depends, and UK replacements for these post Brexit will also be vital. We have initiated local discussion with farmers and other stakeholders through a recent Shropshire Hills Uplands Forum, which has fed directly into national work by the Uplands Alliance and to Defra's Uplands team. We will be continuing this process and look forward to linking at a county level also.

We welcome the action to "*Strategically understand Shropshire's environmental assets, knowledge and expertise, and the ways in which they can be used as resources*" but are unclear what this means in practice.

Priority Action 2: Enable businesses to grow and succeed

This section appears not to take account of the support needs of rural small and micro-businesses, which are significant in Shropshire as a whole, and especially so in the more sparsely populated area of the Shropshire Hills AONB.

The wording of this priority has potential to be used to justify forms of development which are harmful to natural and other assets. The Council has been known to refuse planning permission for a scheme which "*promotes one form of economic development at the expense of another in conflict with Core Strategy Policies CS13 and CS16*". This consideration however rarely seems to be made, especially with regard to industrial scale developments in a high quality landscape and their potential impacts on the AONB and tourism. The AONB Partnership is not 'anti-development', and only objects to a small handful of the many hundreds of planning applications on which we are consulted every year. There is however a need to avoid an apparent policy of 'anything goes' in terms of development.

Priority Action 3: Deliver Infrastructure to support growth

Transport – we would note that a small section (7.5 miles) of the A49 lies within the AONB. Traffic noise from the A49 has been identified as one of the largest impacts on tranquillity in the AONB, a quality which is crucial to its draw to visitors. The management strategy for the A49 should recognise the importance of protecting this economically valuable quality alongside any actions which increase capacity or use of the road.

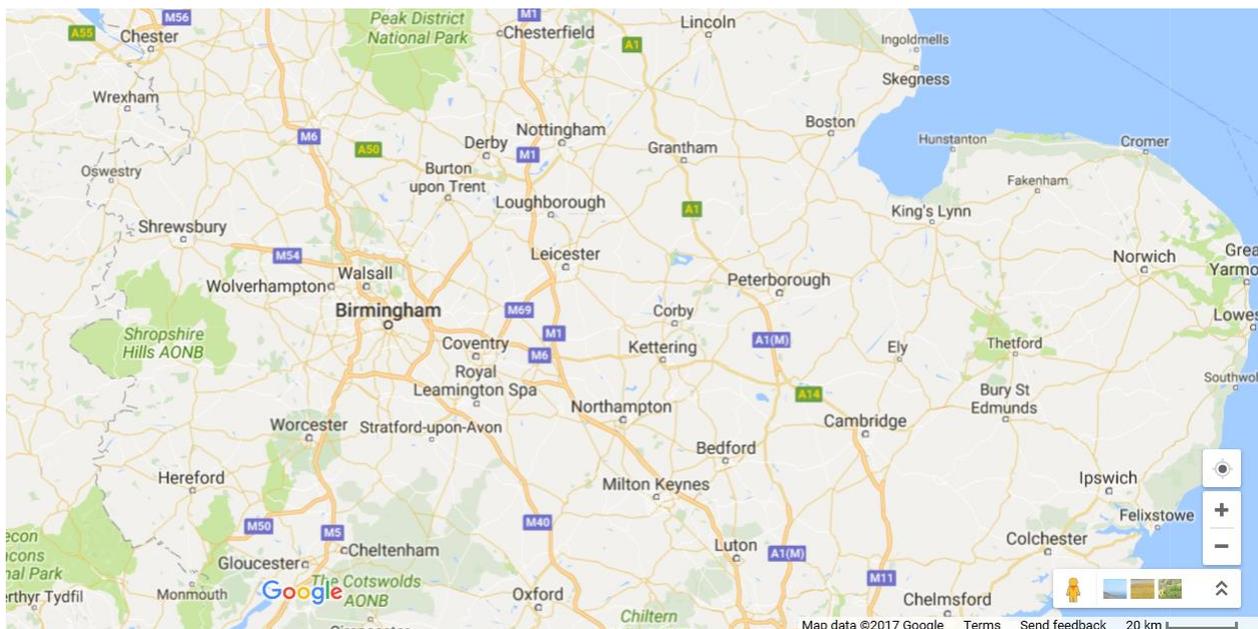
Local place infrastructure – The high quality of the natural environment and attractiveness of the historic and built environment are acknowledged here, but without reference to the need to continue to invest in these. They are not ‘free goods’ which can simply be drawn on and taken for granted.

Priority Action 4: Meet skills needs and people’s aspirations for work

In line with our comments under priority 2, there is a need also to address more traditional rural skills such as in land management, heritage and conservation, as many of these are being lost. The strength of Shropshire’s natural environment and heritage provides an opportunity for the county to be a leader in skills and training in these areas. Through our HLF funded Landscape Partnership Scheme, we have pioneered a multi-skill Environmental Traineeship scheme, providing young people with a bridge from training to employment. We would like to continue this work, and would welcome support to do this.

Priority Action 5: Promote Shropshire to investors

It is ironic that while images of the Shropshire Hills AONB landscape are often used to promote the county, the AONB accolade itself is frequently overlooked, and decisions are too often taken which undermine the quality of the landscape. As shown below, the AONB is by far the most prominent thing in Shropshire on Google maps, as used on thousands of commercial websites, and not just those relating to visitors and tourism.



I would like to request, along with our Manager Phil Holden, to meet with you soon to discuss how the asset of this special landscape and the activity associated with it can be best used and nurtured for the benefit of people in Shropshire and more widely.

Yours sincerely

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