

## AONB MANAGEMENT PLAN CONSULTATION AND APPROVAL

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### Summary

This paper summarises the responses to the public consultation on the draft new AONB Management Plan for 2019-24, and sets out the expected timetable for the Plan's approval by the two local authorities.

### Recommendation

The Partnership is recommended to comment on the issues raised and endorse the draft Plan to go forward for formal approval.

### Background

The public consultation ran from 15<sup>th</sup> November 2018 to 1<sup>st</sup> February 2019. Relatively few consultation responses were received, partly since all key delivery partners are involved in the Plan preparation through the AONB Partnership. A summary of the consultation comments received and an outline response to these is given in Appendix 1.

Some of the comments conflict with other comments made, or with clear views of the Partnership expressed in preparation of the Plan. In making any amendments, the views of other partners and the prevailing views of the Partnership must be taken into account, since there is no further public consultation on the changes made.

The nature of amendments requested which it is felt can be accommodated without going against the prevailing view are relatively minor, and a revised draft of the full Plan is not therefore included with this paper. An indication of the likely areas of minor changes in wording can be seen in Appendix 1. A revised draft of the Plan showing amendments made can be provided to any Partnership member who wishes. Some further improvements in formatting and presentation will also be made without introducing any substantive changes.

The next stage before going to the Councils for approval is 'formal observations' by Natural England, but their comments on the consultation indicate that this will not raise any issues.

The Management Plan is currently scheduled for approval (along with the revised Partnership Terms of Reference) at Shropshire Council's Cabinet for 10<sup>th</sup> April 2019. Due to local government elections in Telford & Wrekin Council, the Plan and Terms of Reference will not be able to go to Telford & Wrekin's Cabinet until June. It may be desirable, or necessary, to delay the Shropshire approval further, bringing the two closer into line.

**List of Background Papers**

Draft Management Plan and supporting documents at

<http://www.shropshirehillsaonb.co.uk/a-special-place/management-plan/>

**Human Rights Act Appraisal**

The information in this report is compatible with the Human Rights Act 1998.

**Environmental Appraisal**

The recommendation in this paper will contribute to the conservation of protected landscapes.

**Risk Management Appraisal**

Risk management has been appraised as part of the considerations of this report.

**Community / Consultations Appraisal**

The topics raised in this paper have been the subject of earlier consultations with Partnership members.

**Appendices**

Appendix 1 Summary of public consultation comments and response

**Shropshire Hills Draft AONB Management Plan 2019-24**  
**Summary of written comments from public consultation and response**  
**Feb 2019**

<b>Summary of comments</b>	<b>Summary of response</b>
<b>Individual</b>	
Loophole in planning allowing changing touring and static seasonal use caravan sites into 'park home' developments for permanent residential use, particularly for older people downsizing from 'proper' homes outside the county.	Agreed this can be an issue. The Management Plan cannot change planning policy, but may be able to guide an interpretation that recognises the difference between residential use and genuine tourism developments
<b>Individual</b>	
There are far too many deer. Without effective protection from and control of deer, efforts to encourage more broad-leaved woodland will always be hampered.	More of a problem in some places than others. Plan can give greater recognition to this.
Can a local housing association encourage conversion of large properties into smaller units suitable for and affordable by young families.	Many would agree, but this is unlikely to be an area over which the Management Plan will carry influence
Not enough charging points for electric vehicles.	A strategy has recently been put in place to expand these. This can be mentioned in the Plan
Encourage local retail and catering outlets to participate in the national Refill Scheme which, by providing access to tap water.	A good suggestion and this is now being discussed among tourism bodies
Can something be done about hedgehog decline?	The Plan cannot go into detail about every species that is in decline, but agreed this is a concern and can be mentioned
<b>Individual</b>	
More emphasis on climate change	Climate change is a high level priority in the Plan
Trees should not be planted on other good wildlife habitat	Guidelines for planting in the Plan do say this
Monitoring planning applications is weak – should be make recommendations	Proposal for monitoring is not instead of making responses, but in addition
Disappointed to see 'promote less well known locations in the AONB' for visitors. Want to maintain tranquillity.	There is a need to spread the load, but many places will remain quite and tranquil
<b>Individual</b>	
Botanical diversity on Clee Hill and Catherton Common is suppressed by levels of sheep grazing. Curlews also affected.	These sites are within schemes trying to optimise conservation condition while meeting commoners' needs. The upland commons project 'Our Common Cause' may provide some assistance.
Baseline has shifted in terms of people's perception of normal levels of wildlife	Agreed. The Plan may need to make this clearer.

<b>Summary of comments</b>	<b>Summary of response</b>
Sheep grazing is valuable but better balance is needed. National Park designation would help.	The Management Plan has no direct influence or control on stocking levels. An optimum for delivery of public benefits is supported. The Partnership and Councils have discussed the potential for National Park status and have agreed to wait to see the outcome of the Glover Review.
<b>Church Stretton Town Council</b>	
Plan is very well presented and laid out. Interesting. Text is clearly written. List of contents useful.	Comments appreciated.
Policies related to Local Plan policies	"
Views are escribed as a 'significant consideration' but could be given greater emphasis by inclusion in a policy	Agreed, this change could be made.
Agricultural workers' dwellings are an exception to normal policy – more could be said on this	Local authority policies make this sufficiently clear
Windfarm policy is sensible but is ref to TAN 8 necessary?	TAN 8 affects developments in Wales which may be very close to the boundary and affect the AONB
Policy P8 should wording be 'guidelines should be followed' rather than 'are recommended'?	Agreed wording is better
Conflict between mountain bikers and walkers – policy EC1 could mention this	Agreed
<b>Natural England</b>	
Welcome thorough approach taken to considering the key issues and needs within the AONB	Comments appreciated
Plan is detailed and provides excellent evidence base and context for policies and actions	"
Welcome Exec Summary and separate policies and actions documents. Area sections are useful.	"
Recommend inclusion of importance of views into the AONB as part of special qualities	Agreed
Policy P1 suggest wording as follows: 'Development in the area around the AONB should be assessed for its impacts on the special qualities of the AONB itself, and also take account of the special qualities and landscape quality of the setting of the AONB'	Agreed
The Habitat Regulations Assessment report received will be considered	Noted

<b>Summary of comments</b>	<b>Summary of response</b>
No comments to make on Strategic Environmental Assessment	Noted
<b>National Farmers Union</b>	
AONBs must take account of people living and working there and address wider economic challenges	The legal requirement is for AONB designation to take this into account, while focussing on the statutory primary purpose to conserve and enhance natural beauty
Support for competitiveness – productivity and growth in Plan Vision	Not clear that this relates to delivering conserve and enhance natural beauty
Unhappy with “Not enough progress has been made on water quality and catchment management”	The evidence supports that not enough progress has been made
NELMS – farmers need a voice	Agreed. We will support and encourage full involvement of farmers
Make more of arable and livestock sector in special qualities	Wording will be amended
Unhappy with “worry that major developments are recommended for approval”	This is in line with presumption against major developments in AONBs, Management Plan policies and Partnership positions.
Do not recognise “battling against nature”	On some land considerable effort is required to overcome natural constraints on the land to achieve modest improvements in production, while there are costs to the environment
Repeat that Plan understates arable	Arable is 18% of the AONB
Policy LM1 habitat networks – views of landowners must be integral	Agreed that in many cases support of private landowners is needed, but the policy expresses aspiration
Poultry manure is not classified as waste	If applied at legal levels. Above this it can be. Nitrogen enrichment from poultry is a serious issue
Why is modelling of impacts of poultry not adequate?	This has been found to be the case by EA
Poultry is connected with the landscape	Much less directly than grazing livestock on the land
Policy P5iii Housing. Concern about “housing should be appropriate for needs of agricultural workers and not shortcut to open market”	This is just about meeting requirements of Council policies
Query whether large livestock units would be classified as major development	This is at the discretion of the local authority
Concern that agricultural growth only supported in exceptional circumstances	‘Exceptional circumstances’ applies to major development, not all forms of agricultural growth
Unhappy with being against new buildings where these would exceed size of existing built footprint of farmstead	Planners have encouraged the definition of guidelines in the Management Plan. Policy has been supported by the Partnership
Against restriction of new sheds in open field locations	Open field locations usually have a higher landscape impact

<b>Summary of comments</b>	<b>Summary of response</b>
Impacts on farms from allocation of housing sites should be considered	This is fairly rare, and in such cases the housing site is often being put forward by the farmer as a money making exercise
Concerning that major developments of renewables would be refused	This is national policy
Extension of AONB boundary by 5km is concerning	There is no extension to the boundary
Plan has no action to improve broadband	Does not relate directly to conserving and enhancing natural beauty
Discussions about boundary extension should take place openly and involve wider community	Agreed. Recent discussions have not been initiated or led by the AONB Partnership
Against National Park status	Noted
Has landscape improved to justify National Park status?	Natural beauty criterion is the same for National Parks
Avoid creating over-burdensome requirements on businesses	The AONB Partnership has no regulatory powers, and provides a lot of support to businesses
No mention of litter and fly-tipping	Agreed – this will be added
Keen to assist with development of planning policy	Happy to make links with Council planning policy team