

Shropshire Hills AONB Partnership response to Strategic Sites consultation, 9th Sept 2019

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

In addition to relevant sections of the NPPF and various Shropshire planning policies, 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).

Q6. Do you agree with the identification of the Former Ironbridge Power Station as a preferred strategic site?

The former Ironbridge Power station site is wholly outside the AONB but lies immediately adjacent to it. We have no objection overall to the allocation of the former power station site for some redevelopment, but we do have comments in relation to the designated AONB about how development may be done.

The AONB Management Plan 2019-24 approved by Shropshire Council states in the Wrekin Forest Local Area Section:

The redevelopment of the former Ironbridge Power Station close to the AONB near Buildwas will be a big factor over the coming years. This large site lies right between the AONB and the Ironbridge Gorge World Heritage Site, and the scale and design of development need to be appropriate and sensitive.

Policy P1 viii) of the Management Plan on setting of the AONB is relevant to this site:

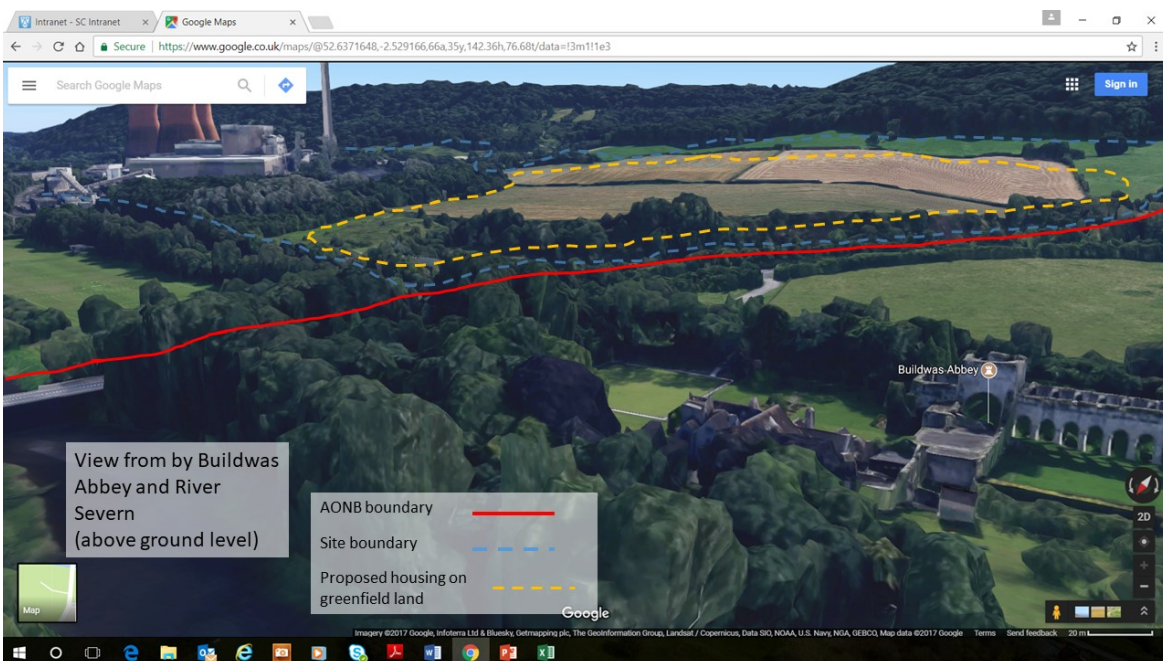
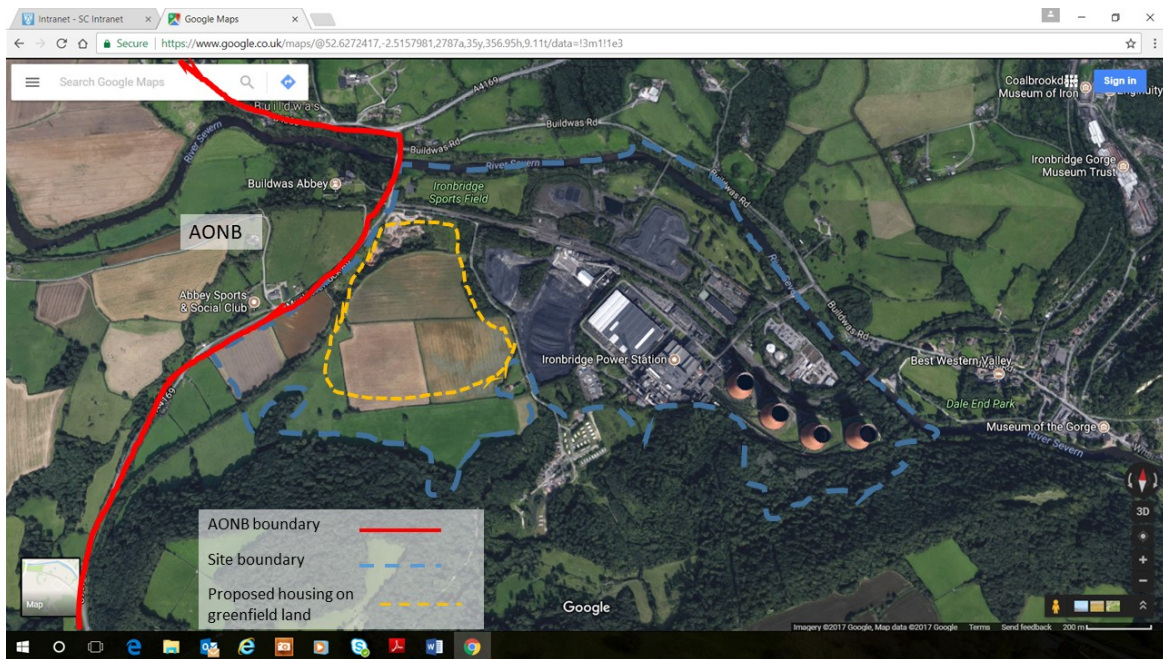
Setting of the AONB. Development in the area around the AONB should be assessed for its impacts on the special qualities of the AONB itself, and also take account of the special qualities and landscape quality of the setting of the AONB. Measures to consider and mitigate such impacts should include where required Landscape and Visual Impact Assessments; care over orientation, site layout, height and scale of structures and buildings; consideration of the landscape, land uses and heritage assets around and beyond the development site; careful use of colours, materials and non-reflective surfaces; restraint and care in the and use of lighting.

[This policy links with current Shropshire Council Core Strategy policies CS5 Countryside and Green Belt, CS17 Environmental Networks and SAMDev Policy MD12 Natural Environment].

Q7. Do you have any comments on the proposed site guidelines for the Former Ironbridge Power Station?

The guidelines and the consultation document overall do not mention the Shropshire Hills AONB, and it is not apparent that potential impacts on the AONB have been considered in the proposed allocation of this strategic site (including landscape and visual impacts but also other aspects of the AONB's special qualities).

The Partnership's main concern is that the western part of the site, abutting the AONB, is greenfield agricultural land. Building here is not therefore redevelopment, and would be a significant change to the character of this area of countryside, which would presumably not be considered if it did not happen to be within the same ownership parcel as the main power station site. This is shown in the images below (yellow dashed area):





View from the Wrekin summit with greenfield land shown in the masterplan for housing development shown in dashed yellow line.

While it is clear that development is not proposed to extend to the furthest boundaries of the ownership, the greenfield area indicated on the masterplan for housing is still extensive. At its north-west corner it comes right up to the AONB boundary and to about 200m from the important heritage asset of Buildwas Abbey. The land slopes to the north, and the uphill southern two fields are visually prominent (as shown above) in views from The Wrekin summit, one of the most visited countryside locations in the AONB and the county. The western part of these fields includes land which starts to slope to the west away from the power station site, so development here would not link visually with main part of the site and would have the impression of spilling over into the valley leading south to Farley occupied by the A4169.

To reduce these impacts on the AONB and important locations and features within it, we believe the extent of development on the greenfield land needs to be reduced, and its layout and landscaping carefully considered with these considerations in mind.

We note also that the scale of housing development in this part of the site will have a significant influence on the scale of off-site impacts of the development, especially from increased traffic. This will affect places beyond the AONB but also includes impacts on the AONB itself, especially from increased traffic on the A4169 towards Much Wenlock and the B4380 towards Shrewsbury. There will also be a knock-on impact of increased recreational pressure on the Wrekin nearby. These considerations do not appear to feature in the site guidelines within the consultation document.

Q8. Do you have any comments on the indicative masterplan produced by The Harworth Group for the redevelopment of the Former Ironbridge Power Station?

On 19th June 2019, the AONB Partnership submitted the following comments to Harworth Group on the indicative masterplan:

Representatives of the Partnership have attended the two stakeholder events held and the Partnership discussed the Masterplan at its meeting on 11th June 2019. We note that this is a pre-application consultation and that only some plans with no written documents have been released for comment, and we therefore make only a fairly brief response and anticipate commenting more fully at later stages.

The power station site is of high sensitivity, abutting the AONB at the western edge and the World Heritage Site to the east. We are not opposed to the principle of redeveloping the site, in a sensitive manner. However, a large proportion of the proposed new housing is on greenfield agricultural land. While in the same ownership, we consider this element goes well beyond 'redevelopment' and sits uneasily under this title. The proposed development of this large area of currently undeveloped land also increases the overall scale of the new settlement and all associated issues, as well as being the area immediately adjacent to the AONB. This part of the site is prominent, sloping land on which development would be highly visible from significant distances and key viewpoints such as The Wrekin. It will also affect the setting of the important heritage site of Buildwas Abbey.

Due to the driver of maximising the number of houses built, the layout and design of the large development is not able to make the best use of opportunities from the rolling terrain, in which a smaller development could be relatively unobtrusive. More use should be made of open greenspace and retaining features of value (e.g. woodland and mature trees) to provide a landscape and biodiversity buffer to the AONB and provide recreational benefits for the new residents.

The secondary impacts from an increased population such as increase in traffic, impacts on tranquillity, change in character from upgrade of roads and new road access, increased recreational use, etc will be significant on existing local communities and will also affect the special qualities of the AONB. Account should be taken of the AONB Management Plan on these as well as landscape and visual matters. Design should minimise these impacts, and appropriate mitigation be put in place. The development should provide some investment in green infrastructure and heritage assets in the area affected.