

Shropshire Hills AONB Partnership

The Old Post Office, Shrewsbury Road, CRAVEN ARMS, SY7 9NZ
T:01588 674080 F:01588 674099 E: shropshirehillsaonb@shropshire.gov.uk

Grahame French
Shropshire Council
The Gateway
The Auction Yard
CRAVEN ARMS
SY7 9BW

Your Ref: 15/03222/FUL
Our Ref: ph_110915_15_03222_FUL

11 September 2015

Dear Grahame

15/03222/FUL Siting of an Anaerobic Digester and ancillary works and buildings - Land to the East of Warthill Farm, Bitterley, Shropshire

The Shropshire Hills AONB Partnership objects to this application on the grounds of resource protection and biodiversity.

The application has considered three locations for siting the AD plant. Whilst the Planning Statement gives reasons for discounting two of these sites, the chosen site actually presents the greatest risk to the freshwater environment as the development is to be located only 30m from the Bitterley Brook; a tributary of the River Teme which is designated a Site of Special Scientific Interest (SSSI). The Shropshire Hills AONB Partnership is concerned that the application lacks any detail regarding how this most vulnerable feature is to be protected.

Our specific areas of concern are:

1. The AD process requires the utilisation and storage of large quantities of solid and liquid biomass. Reference to this is made in the Digester Details document (p3 and 4) which states the need for quantities of fluid biomass and wet solids of 22,000 t/pa. The Document states that this could include cattle manure, slaughterhouse waste and sewage sludge. This is a large amount of liquid/wet biomass to be handled on site. These materials and the close proximity of the AD Plant to the Bitterley Brook constitute a risk to the freshwater environment.
2. The application does not detail how liquids are to be safely delivered to the intake system or if there are any measures to control spills/breaches (other than soakaways). Furthermore, the location of these soakaways are not marked on the applicants Site Plan, neither is their capacity to deal with spills/surface runoff detailed. We would expect a detailed plan to deal with this eventuality and the installation of a suitable sustainable drainage system (SuDS) for such a development.
3. The AD process produces a few undesirable by-products including liquid digestate which is rich in nutrients, and a wastewater effluent which cannot be utilised by AD plant. The Planning Statement Section 7.2.3 makes reference to exporting digestate. There are no details of how this is to be managed on site. There should be clarification, including details of disposal and mitigation as both by-products have serious consequences should they enter the freshwater environment.

The following policy statements apply:

[Shropshire Council Core Strategy Policy CS17: Environmental Networks states:](#)

Development will identify, **protect, enhance, expand and connect Shropshire's environmental assets**, to create a multifunctional network of natural and historic resources. This will be achieved by ensuring that all development:

- **Protects and enhances the diversity, high quality and local character of Shropshire's natural, built and historic environment, and does not adversely affect the visual, ecological, heritage or recreational values and functions of these assets, their immediate surroundings or their connecting corridors.** Further guidance will be provided in SPDs concerning the natural and built environment;
- **Contributes to local distinctiveness, having regard to the quality of Shropshire's environment, including landscape, biodiversity and heritage assets, such as the Shropshire Hills AONB, the Meres and Mosses and the World Heritage Sites at Pontcysyllte Aqueduct and Canal and Ironbridge Gorge**
- **Does not have a significant adverse impact on Shropshire's environmental assets and does not create barriers or sever links between dependant sites;**

(emphasis added)

Shropshire Council SAMDev Policy MD12: The Natural Environment states:

In accordance with Policies CS6, CS17 and through applying the guidance in the Natural Environment SPD, the conservation, enhancement and restoration of Shropshire's natural assets will be achieved by:

1. Ensuring that the social or economic benefits of development can be demonstrated to clearly outweigh the harm to natural assets where proposals are likely to have an unavoidable significant adverse effect, directly, indirectly or cumulatively, on any of the following:

- i. the special qualities of the Shropshire Hills AONB;*
- ii. locally designated biodiversity and geological sites;*
- iii. priority species;*
- iv. priority habitats;*
- v. important woodlands, trees and hedges;*
- vi. ecological networks;*
- vii. geological assets;*
- viii. visual amenity;*
- ix. landscape character and local distinctiveness*

Explanation to Policy MD12 para 4.115 sets out in detail the level of protection offered to Shropshire's natural assets:

4.115 Internationally and nationally important sites of wildlife conservation and geological interest as well as legally protected habitats and species will be afforded the highest level of protection in line with the relevant legislation and policy. Great weight will also be given to conserving and enhancing the natural beauty of the Shropshire Hills AONB, having regard to the AONB Management Plan. Development proposals affecting or involving the following will be assessed in accordance with the relevant legislation and national policy; European and nationally designated wildlife sites (Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar and Sites of Special Scientific Interest (SSSIs) and all candidate designations; Major developments in Areas of Outstanding Natural Beauty; Ancient woodland, other irreplaceable habitats and aged or veteran trees; Pollution – including noise, water, air and light pollution Further details are given in the Natural Environment SPD; (emphasis added)

Yours sincerely

Phil Holden
AONB Partnership Manager