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Your Ref: 12/03034/MAW  
Our Ref: gc\_150812\_Lea Quarry obj

15 August 2012

Dear Graham

**12/03034/MAW Application under Section 62 of the Town and Country Planning Act 1990 for the temporary change of use of the quarry land and associated buildings; erection of two storage buildings; extension to quarry building and installation of photovoltaic panels; change of use and extension to the office building, Lea Quarry, Presthoke, Much Wenlock, Shropshire, TF13 6DQ**

The Shropshire Hills AONB Partnership **objects to this application**, which seeks to put in place **inappropriate industrial use in a highly sensitive location, which would result in huge loss of existing and potential public benefits in terms of conservation value, access, amenity and recreation, and potential employment through tourism**. This contravenes many aspects of national and local planning policy, and is incompatible with the statutory AONB Management Plan. The approach of a part retrospective application for development and use which is already in place is highly insensitive to public opinion, given the extensive local engagement over recent years in developing an integrated vision for after-use of the quarries, which is jeopardised by this unsuitable proposal.

**A reasonable development, but in the wrong place.** The contribution of this development to renewable energy generation meets both government and local objectives, and will have maximum sustainability benefits if supplied with local timber, which is unclear in the application. However, while the previous intrusive quarrying operation had to take place in this location because that is where the stone was, this storage and woodchip operation could be sited in many alternative locations where its impact would be minimal. This development does not take any advantage from the exceptional environmental value of the site, but at the same time detracts substantially from that value.

**Restoration of the quarry has not been completed** to the required standard following the cessation of quarrying operations. This restoration would have brought the site up to the standard of a greenfield site, and due to the areas of rock exposure, shallow soil limestone grassland (a rare and important habitat in Shropshire) and heritage interest in the quarry, the site has potential to be hugely important for conservation and quiet enjoyment. For the site to be treated as a brownfield site suitable for industrial use is to overlook not only the requirements for full restoration, but also its enormous significance in the context of the whole of Wenlock Edge, one of the strongest elements of Shropshire's environmental networks.

### **Value of the site and its importance as part of Wenlock Edge, the AONB and Shropshire's environmental network**

Lea Quarry lies on the crest of Wenlock Edge, a limestone escarpment of international significance and a fundamental element of the Shropshire Hills Area of Outstanding National Beauty. The southern portion of the site c 21.2ha lies within the boundary of the Shropshire Hills AONB and the northern portion, 34.0ha, is bounded along its western edge by the AONB. The landscape around the Lea Quarry area falls into the 'Wooded hills and estate lands' type, with a high level of tranquillity along much of its length.

The whole area with the exception of the immediate area of the old quarry buildings is designated for its geology and associated flora as a Site of Special Scientific Interest (SSSI) and also as a Regionally Important Geological Site (RIGS). The SSSI citation states:

***“The world famous Wenlock Limestone outcrops of Wenlock Edge rank amongst Britain’s most important geological sites. Studied by generations of geologists, the Edge remains a key research and educational locality. These are the finest sections available in the Wenlock Limestone, and they provide the best examples of reef development during the Silurian Period in Britain. The limestones contain a rich fossil fauna, and many fossil species, particularly of corals, brachiopods, trilobites and ostracods were first described from specimens collected here: Wenlock Edge is thus the standard or type locality for these species. The middle part of the Silurian Period is named the Wenlock Series after this area and localities within this site constitute the best sections available in the upper part of the Wenlock Series. This is a site of international significance for its stratigraphy and its unrivalled reef exposures.”***

The citation also stresses the biological importance of the SSSI, stating “*Grasslands are now scarce on Wenlock Edge, and are confined to two or three small areas above rock outcrops and to somewhat larger examples in areas previously disturbed by quarrying.*”

Historically Lea Quarry is part of a wider group of quarries, lime kilns and associated features which have origins in the medieval period and are nationally and internationally significant in relation to the technological, economic and social development of early industry from the 17th Century onwards.

Wenlock Edge is an important and popular area for recreation and tourism in the Shropshire Hills. The National Trust’s Presthope car park lies just south of the site, with paths along the Edge providing views into the quarry. Long distance routes the Shropshire Way and the Jack Mytton Way run along Wenlock Edge, and this year a new Wenlock Edge Wanderer Shuttle bus route has been established to aid exploration of the Edge and boost sustainable tourism. Shropshire’s Core Strategy states:

*“Sustainable tourism, and high quality cultural and leisure development can deliver wide ranging benefits for Shropshire by contributing to a successful visitor economy; providing a potential focus for regeneration; supporting the quality of life of local communities; and promoting social inclusion. Within Shropshire, tourism is a key local economic sector which generates around £457m a year from around nine million visits and supports around 8,786 full time job equivalents.”* The Shropshire Hills AONB accounts for over 5 million of those visits, and sustainable tourism has been formally adopted as the mainstream approach to tourism development in the area, the AONB being recently awarded the European Charter for Sustainable Tourism in Protected Areas (see <http://www.shropshirehillstourismpartnership.org.uk/>).

In the relevant area section, the Shropshire Hills AONB Management Plan states

***“The closure of some quarries on Wenlock Edge creates important opportunities to secure sustainable long term uses, making the most of biodiversity and geological interest, and the potential for appropriate quiet forms of recreation. ... The need to retain character and limit the negative impacts of change and development is probably more acute here than anywhere else in the AONB. ... A sustainable tourism approach is vital in this part of the AONB, and also made more possible by the good transport links, attractiveness for walking and landscape interest of the area.”***

Shropshire’s Core Strategy 2011 states (para 7.7) “*For development affecting the Shropshire Hills AONB, particular regard should be paid to the Shropshire Hills AONB Management Plan.*”

The value of environmental networks lies not just in the value of individual sites of conservation importance, but in their connectivity and their ability to deliver multifunctional benefits. “*This includes providing opportunities for informal recreation for local communities and tourists; improving health and community wellbeing, sense of place and identity, social cohesion, increasing biodiversity value and maintaining air quality.*” (Shropshire Core Strategy para 7.4). Wenlock Edge is therefore not only one of the longest continuous woodlands in England, but also a unique corridor in which limestone geology and wildlife, tranquillity and beauty, and important access and recreation opportunities all coincide. Inappropriate development in a key part of this corridor can therefore undermine the integrity and economic potential of the environmental network.

### **Disregard for the comprehensive vision for the quarries, supported by the local community**

The proposed development and activity undertaken on the site already without planning permission have been without regard to the extensive work carried out over recent years by the National Trust supported by the AONB Partnership, to develop with local residents an integrated vision for the after-use

and future of the quarries on Wenlock Edge. With a focus on maximising environmental value and becoming a place for local and visiting people to enjoy, this vision anticipates that the return in the quarries of natural biological systems and access to the special geological features will enhance the wider landscape and link well with the Shropshire Hills Area of Outstanding Natural Beauty. By including appropriate business opportunities, leisure pursuits and lifelong learning initiatives there is an excellent possibility that the site can become the focus of an integrated regeneration of this rural hinterland to the market towns of Shrewsbury, Church Stretton, Much Wenlock and Bridgnorth and beyond to the West Midlands.

### **Potential impacts of the development**

The impacts of the development on this highly sensitive site need to be studied in a **full Environmental Impact Assessment, which should be required before any decision on the application is made.** They are likely to include:

- Industrial scale development affecting the quality and integrity of a key part of the Shropshire Hills AONB.
- Prevention of full restoration of the former quarries to non-industrial use, and limiting their considerable potential to deliver public benefits and economic return based on their high environmental value.
- Impact on landscape character and visual amenity
- Noise and loss of tranquillity from considerable passage of heavy vehicles and from the chipping operation.
- Limiting the achievement of optimal condition of part of the Wenlock Edge SSSI, by preventing restoration of quarried areas to valuable limestone grassland habitat.

### **Policy Background**

#### National Planning Policy Framework

*Paragraph 115 "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding National Beauty."*

*Para 113." Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that **protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.**"*

*Paragraph 118 "Proposed development on land within or outside of a SSSI likely to have an adverse effect on the SSSI should not be normally permitted".*

#### Shropshire Core Strategy

*CS5 Countryside and Green Belt "In the open countryside, new development will be strictly controlled in accordance with national planning policies protecting the countryside and Green Belt from inappropriate development."*

*"there will be areas where development will need to pay particular regard to landscape character, biodiversity or other environmental considerations including in the Shropshire Hills Area of Outstanding Natural Beauty". (explanation to CS5)*

*CS16: Tourism, Culture and Leisure "Supporting development that promotes opportunities for accessing, understanding and engaging with Shropshire's landscape, cultural and historic assets including the Shropshire Hills AONB, rights-of-way network, canals, rivers and meres & mosses. Development must also meet the requirements of Policy CS17."*

CS17: Environmental Networks 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;**

CS20 Strategic Planning for Minerals. Priority will be given to **environmentally acceptable restoration and aftercare proposals** which can deliver targeted environmental or community benefits consistent with Policies CS8, CS17 and CS18.

Shropshire Hills AONB Management Plan 2009-14 (Policies formally approved and adopted by Shropshire Council).

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

### **Summary**

The AONB Partnership strongly objects to the application, which is at odds with national and local policy, with the statutory aims of the AONB and its Management Plan, and with a great weight of local public opinion.

Yours sincerely

George Chancellor  
Chair, Shropshire Hills AONB Partnership