

Graham French  
Shropshire Council  
Shirehall  
Abbey Foregate  
SHREWSBURY  
SY2 0ND

Direct Line: 01588 674088  
Email: [phil.holden@shropshire.gov.uk](mailto:phil.holden@shropshire.gov.uk)  
Your Ref: 12/03034/MAW  
Our Ref: gc\_211112\_Lea Quarry obj

21 November 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 at its meeting of 20 November considered a paper on the additional information provided on this application and resolved to maintain and re-state the Partnership's firm objection to the application. The AONB Partnership has 36 members from a wide variety of sectors and has the formal status of the Joint Advisory Committee to advise the two Councils in respect of the AONB and their functions related to it.

**Response by the applicant to our objection letter of 15 August 2012**

The applicant has made a number of points in response to some of the specifics of our objection. The Partnership feels that these in no way answer or negate the case we have made for refusal, and we stand by the letter of 15 August and its content. Specifically:

- We do not accept that local use and supply of wood is an adequate argument for use of this particular site, and that a suitable local site with similar advantages could not be found. Neither do we accept that the drying conditions found in the quarry are sufficiently unique to justify this use in such a sensitive location.
- The fact that the buildings are outside the SSSI does not affect the fact that most of them were required to be removed in the quarry restoration conditions, and failure to do this is a major and unacceptable blight on the location.
- The argument that the compacted quarry base has not yet been recolonised by vegetation carries no weight whatever since no attempt has been made properly to restore these areas, which do have important potential as valuable habitat.
- We do not accept any issues of precedent arising from other developments, and contend that this application fails to meet necessary standards of environmental sensitivity, when considered on its own merits.
- We disagree that there is no loss of habitat connectivity. The photograph at Appendix 1 illustrates very clearly how the quarries form a major break in the exceptional habitat network of Wenlock Edge, and by preventing full and proper restoration, this application perpetuates this problem.
- In relation to tourism and amenity impacts, the starting point must be the assumption that the quarry site should be fully restored. Stating that the applicants' plans will provide an improvement compared to the quarrying operation is meaningless when the quarry was only granted permission on the basis of full restoration.
- It is misleading to say that access provisions are in line with AONB policies when so little information has been provided about those provisions, and when the application itself is at odds with a number of

these policies. It is also misleading to refer to interest in visiting the site from the community as somehow endorsing the development, when the balance of local opinion is so clearly opposed to the development.

- The assertion that the applicant is embracing localism and partnership really does not accord with the approach taken in starting the development without planning permission or local consultation. Even the smallest amount of local consultation would have revealed the extent of consultative work carried out by the National Trust project which we supported, and the need for a sensitive approach. Pre-application discussions appear to have been taken as a green light for the development in flagrant disregard for the planning process. Relevant officers from Shropshire Council's planning department were involved in the earlier consultative processes around a long term wider vision for the quarries and should indeed have highlighted the need for sensitivity and careful consultation regarding this development.
- On the basis of the extensive views which have been expressed about enjoyment of the area, we disagree that an industrial process of wood storage and chipping is a valuable addition to the recreational appeal of the area. Indeed, most people would consider it quite the opposite.

### **Determination of screening opinion on the need for an Environmental Impact Assessment (EIA)**

We disagree with the analysis and conclusion of this paper. A reductionist approach breaking down and discounting individual aspects of the impact of this development fails to appreciate how these aspects interact and combine, and the way in which it affects the integrity of the site and wider location. As well as apparently rehearsing the case for why the development will not have a significant impact on the AONB, the document goes into several lines of argument in support of the applicants, raising serious questions about the impartiality of what should be a completely objective process. Indeed the document even appears to overstate the case on behalf of the applicants, saying that *'an ecologist has been appointed'*, when the applicant's own response to our objection says that *'the vision for the site is to recruit an ecologist'*.

### **Planning Support Statement**

The information in para 2.1 of the statement about the site being 'surrounded by' the AONB and 'adjacent to' the SSSI is incorrect and misleading. The majority of the area covered by the application is within the AONB, and all parts of the quarry apart from the immediate area of the buildings are SSSI.

It is quite correct and necessary to assess the visual impact of an application on the AONB. The established methods for doing this are set out in the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment. The series of photographs presented in this document in no way complies with this method, and we do not accept that there is no significant visual impact on the AONB from the development.

However, the AONB is not just about visual issues. Landscape Character is affected by the presence of development irrespective of quite how visible it may be. In addition, Shropshire Council's approved Policy 2 of the AONB Management Plan states

*"Consideration of the purposes of designation in all decisions affecting the AONB should reflect sustainability and the full range of special qualities defined in the Management Plan as well as landscape character and visual amenity."*

Issues such as wildlife, geology, heritage, tranquillity and opportunities for enjoyment are, therefore, as important to the AONB as visual aspects, and as stated above these aspects need to be assessed in combination. In terms of considering sustainability, it is not adequate simply to assume that any proposal regarding renewable energy is the most sustainable, when the energy benefits of this activity could be gained in an alternative location without affecting the landscape of Wenlock Edge and the considerable economic value of sustainable tourism associated with it.

## National Policy

We would reiterate the special status given to AONBs in the National Planning Policy Framework, para 14 of NPPF highlighting AONBs as one of very few examples of areas where *“specific policies in this Framework indicate development should be restricted.”* Para 115 states

*“Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.”*

As a major development (under the definition of the Town and Country Planning (Development Management Procedure) (England) Order 2010 *“(e) development carried out on a site having an area of 1 hectare or more”*), para 116 of NPPF also applies:

*“116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.*

*Consideration of such applications should include an assessment of:*

- o the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- o the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- o any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

## Summary

The AONB Partnership continues to strongly object to the application, which is at odds with national and local policy, the statutory aims of the AONB and its Management Plan, the long-term future of this hugely valuable landscape and a great weight of local public opinion.

We also support the detailed points made by the National Trust in their further objection to the application, and are particularly concerned that short-term commercial expediency should not get in the way of the long term economic and environmental value this site so clearly offers to the county as a whole.

Yours sincerely

George Chancellor  
Chair, Shropshire Hills AONB Partnership

Appendix 1 Lea Quarry and Wenlock Edge from the air

