

Grahame French  
Shropshire Council  
Shirehall  
Abbey Foregate  
SHREWSBURY, SY2 6ND

Your Ref: 14/00784/EIA  
Our Ref: gc\_270314\_14\_00784\_EIA Corfton Farm

27 March 2014

Dear Grahame

**14/00784/EIA Erection of four poultry sheds and feed bins, ancillary works, amendments to existing vehicular access, erection of biomass building and associated landscaping, Corfton Farm, Corfton, Craven Arms, SY7 9DD**

**The Shropshire Hills AONB Partnership objects to this application.**

It is apparent that the tests required in national policy protecting the AONB have not been taken account of at all, and we consider the Landscape and Visual Impact Assessment is flawed, seeking at every opportunity to downplay the AONB and the impact of the proposed development.

It is not the case that being near the boundary of the AONB in any way weakens the protection of the designation, as implied in the LVIA. Neither does the existence of other modern agricultural buildings in this part of the AONB mean that the change from this development would be not significant. Such an argument would allow progressive destruction of the AONB landscape where one poor development justifies the next, and this bears no relation to national and local policy on AONBs. The reality is in fact quite the contrary, in that each development of large agricultural buildings contributes to a creeping industrialisation of the landscape, which in fact makes this part of the AONB highly sensitive to change resulting from further large buildings. The Stretton Valley, Wenlock Edge and Dales section of the AONB Management Plan 2014-19 (as recently approved by Shropshire Council) highlights this very issue: *"Development pressures are the highest here of any part of the AONB... More intensive methods, alternative crops and large agricultural buildings therefore have particular potential to cause harm to the landscape quality of the area."*

The LVIA should classify the Landscape Value as 'high' on account of the AONB designation, and the greater than doubling of the built footprint of this farm can only be described as a 'substantial' or at least a 'moderate' magnitude of change. The impact overall is therefore without doubt 'significant', and the mitigation measures proposed, while lessening the impact, do not make it acceptable.

**The National Planning Policy Framework** is quite clear that general policies within the Framework supporting particular types of development activity do not over-ride the location-specific policies protecting AONBs. Indeed the very first policy paragraph within NPPF, Para 14 on the 'golden thread' of sustainable development, highlights through footnote 9 AONBs as an exception to a presumption in favour of development, as one of a few types of special area where *"specific policies in this Framework indicate development should be restricted."*

The specific policy in Para 115 of the Framework states:

***115. 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. The conservation of wildlife and cultural***

*heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads. (emphasis added)*

The buildings alone in this application would cover greater than a hectare and the development site covers approximately twice this area. **This is therefore unequivocally a 'major development'** under the definition of the Town and Country Planning (Development Management Procedure) (England) Order 2010, and so **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:***

- *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;*
- *the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated (emphasis added)*

**This national policy therefore requires that the application must be refused unless exceptional circumstances and public interest can be proven, which they have not been. The Planning Statement supporting the application is fundamentally flawed by not acknowledging the applicability of NPPF para 116 and addressing the tests within it.**

**Shropshire Council Core Strategy and SAMDev policies also indicate the great weight which should be applied to the AONB designation and indicate that this application should be refused:**

*Explanation to Policy CS5 Countryside and Green Belt, para 4.72 (extract) "whilst this policy seeks to facilitate a wide range of beneficial rural development, the operation of this policy, in conjunction with Policy CS6 and more detailed policies in the SAMDev DPD, recognises the need to consider the scale and design of proposals, where development is most appropriately sited, environmental and other impacts. There will be a significant emphasis on achieving quality and sustainability of design, particularly locally appropriate design and use of materials. Thus, proposals which would result in isolated, sporadic, out of scale, badly designed or otherwise unacceptable development, or which may either individually or cumulatively erode the character of the countryside, will not be acceptable. Whilst these considerations will apply generally, 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." (emphasis added)*

*Policy MD2 Sustainable Design, Explanation (extract)*

***For development affecting the Shropshire Hills AONB, particular regard should be paid to the Shropshire Hills AONB Management Plan and supplementary guidance. (emphasis added)***

*Policy MD7 – General Management of Development in the Countryside*

*(explanation, para 4.66) The changing needs and effects of agricultural and other related enterprises in the countryside are a particular local issue, in particular the impacts of large scale agricultural buildings. General sustainable design criteria and development management considerations are as relevant to this type of development as other proposals in the countryside and the Plan seeks to balance the needs of the countryside as a working environment with its role as a place to live and enjoy. The policy defines the primary considerations that will be taken into account in considering agricultural development proposals which require planning consent. Additional criteria set out in other relevant policy such as MD2 Sustainable Design and MD12 Natural Environment which, for example, highlights **special requirements in the Shropshire Hills AONB, which would also need to be taken into account in considering applications.** It should be noted that where appropriate, planning conditions will be attached to a permission to control the quality of the development and to ensure the scheme incorporates appropriate agreed mitigation measures such as coloured external cladding, landscaping and waste management; (emphasis added)*

*Policy MD12 Natural Environment (Explanation)*

4.113 Policy MD12 sets out in detail the level of protection offered to Shropshire's natural assets. Natural assets include: biodiversity and geological features; trees, woodlands and hedges in both rural and urban settings; the ways in which the above combine and connect to create locally distinctive and valued landscapes, **including the Shropshire Hills Area of Outstanding Natural Beauty** and the contribution all of the above make to visual amenity;

4.114 Such assets provide ecosystem services including; flood relief; soil retention; climate change mitigation and adaptation; carbon sequestration; interception of airborne pollutants; water filtration; amenity value; health and well-being benefits and opportunities for tourism and recreational activities. These services are essential to a thriving economy;

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)

The following policies of the Shropshire Hills AONB Management Plan 2014-19 also indicate that this application be refused:

*Valuing the AONB in Planning and Decisions - Protection of the AONB*

*In line with national and local authority planning policies, the AONB has the highest standards of protection for landscape and natural beauty and the purposes of designation should be given great weight in planning decisions, also taking into account the statutory AONB Management Plan.*

*Encouraging a Sustainable Land Management Economy - Agricultural development. Farm enterprises need to be in harmony with the environment and not degrade this resource, which also provides an important economic asset for the future.*

*Design of new agricultural buildings including location, structure and materials should be of a high standard appropriate to the AONB, taking account of the published AONB agricultural buildings design guidance. [http://www.shropshirehillsaonb.co.uk/wp-content/uploads/2010/10/Agricultural\\_Buildings\\_Design\\_Guide3.pdf](http://www.shropshirehillsaonb.co.uk/wp-content/uploads/2010/10/Agricultural_Buildings_Design_Guide3.pdf)*

We note further with disappointment that the Council's scoping opinion for the EIA does not mention the need to consider the AONB designation within '*description of the aspects of the environment likely to be affected by the development*', but only in connection with our comments as a consultee. We would observe that it is the planning authority that holds the statutory obligation to have regard to the purposes of the AONB and this should not be dependent on the AONB Partnership's comments as only a non-statutory consultee. The undervaluing of the AONB in this scoping opinion is not at all consistent with national policy in NPPF and the Council's own policies as quoted above, and unfortunately paves the way for the developers' own documentation also systematically to underplay the impact of the development on the AONB.

Yours sincerely

George Chancellor  
Chair