

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

Your Ref: 14/03290/EIA
Our Ref: ph_271114_14_03290_EIA Poultry sheds

27 November 2014

Dear Grahame

14/03290/EIA Construction of four poultry sheds and feed bins, ancillary works, formation of new vehicular access, erection of biomass building and associated landscaping, south east of Hopton Heath

The Shropshire Hills AONB Partnership reaffirms its objection to this development and considers its scale to be unsustainable immediately upstream of the River Clun Special Area of Conservation (SAC) and the River Teme Site of Special Scientific Interest (SSSI).

Comment on the Additional Papers dated 12th November 2014:

The River Clun Nutrient Management Plan (NMP) sets the target figure for Phosphate to be 0.01mg/l to meet Favourable Condition. However the Addendum Report and the Updated Ecological Assessment Report states: ".....**surface water run-off resulting from the new development does not exceed the phosphate target for the River Clun of 0.02mg/l.**" The 0.02mg/l figure is the interim target, it is important that the lower figure of 0.01mg/l is acknowledged as the required target.

Furthermore, although amendments to both the Ecological Assessment Report and the Drainage and Flood Risk Report have been made to take into account issues raised, we are concerned about the potential impacts on the River Clun SAC during the development phase. The existing ground levels detailed in the Elevations and Full Site Sections Plan, show that major excavations will be necessary to facilitate development. The proximity of these operations to the watercourse and potential for increased sediment runoff to the SAC is of concern.

This risk is recognised by the applicant's Environmental Statement Final (p68) which states: "**There could be a direct negative and permanent impact of major significance unless the necessary precautions are taken with regards construction phase run-off reaching the River Clun SAC via the site boundary stream.**" It should be noted that sediment/siltation is cited as a key issue in both the River Clun NMP and the Site Improvement Plan for the River Clun see: <http://publications.naturalengland.org.uk/publication/6216527934128128>.

The mitigation statements provided in the Ecological Assessment Report and the Drainage and Flood Risk Report still do not adequately define mitigation measures for soil management during the development phase or the consequences of newly exposed/excavated soil entering the watercourse via overland runoff or via trafficked areas. It appears the only stated mitigation is to be the existing riparian buffer, which is narrow and dies back in winter. We do not consider this to be adequate protection to cover eventualities.

Comment on Appendix 11 Water Resources Impact Tables:

These downplay the significance of a potential pollution incident both during development and operation, citing the magnitude of impact as negligible and the significance of impact as insignificant.

This appears contrary to The Environmental Statement - Final (p68) which states “.....***There could be a direct negative and permanent impact of major significance...***”. It is recognised that pearl mussels have extremely demanding water quality requirements. The inability to meet these requirements is why the Clun SAC is in Unfavourable Condition and why the pearl mussel population is moribund and declining (Natural England unpublished report 2014). Due to the connectivity of the proposed development to the Clun SAC only 1400m downstream, it should be recognised that any water resources impact has the potential to be severe rather than negligible or insignificant. It is important that the very high sensitivity of the Clun SAC and its receptor waters be recognised.

Yours sincerely

Phil Holden
AONB Partnership Manager