

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

Your Ref: 14/03290/EIA
Our Ref: ph_280814_14_03290_EIA Poultry sheds

28 August 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 objects to this application.

The proposed development is located adjacent to a tributary stream joining the River Clun and is within close proximity to the River Clun Special Area of Conservation (SAC) and the River Teme Site of Special Scientific Interest (SSSI). The River Clun is designated as a SAC for its freshwater pearl mussel interest; it is of international significance and is one of only three rivers in England so designated.

Natural England considers the River Clun SAC to be in 'Unfavourable Condition' and therefore failing to meet its statutory target. Furthermore the International Union for Conservation of Nature (IUCN) identifies freshwater pearl mussel as a 'Critically Endangered' 'Red List' species. In this context, the River Clun pearl mussel population represents a unique genetic resource requiring special measures to ensure its future survival.

Over recent years the River Clun has been subject to extensive studies and an understanding of the situation relating to pearl mussels and the processes contributing their decline (and that of the River Clun SAC) has improved greatly in recent years. These studies have established that the mussels are in critical decline and unlikely to survive unless the pressures contributing to the deterioration of the SAC are reversed. Studies include the River Clun SAC Nutrient Management Plan (Draft) and the River Clun SSSI/SAC Restoration Strategy <http://www.shropshirehillsaonb.co.uk/wp-content/uploads/2012/03/River-Clun-Restoration-Strategy-v3b.pdf> and <http://www.shropshirehillsaonb.co.uk/wp-content/uploads/2012/03/Jacobs-River-Clun-Restoration-Strategy.pdf> both of which consider the main reason for decline to be intensification of land management practices, particularly those that lead to elevated levels of nutrients, sediment and pesticides.

The proposed development is large scale and represents significant intensification within close proximity of to the River Clun SAC. The stream that runs adjacent to the site is designated as an 'Ordinary Watercourse' and therefore a key receptor and pathway to the River Clun SAC only a short distance downstream. The applicant's reference to a 'ditch' would appear to downplay its significance. The Flood Risk Assessment and Drainage Report (Appendix 10) indicates an intention to divert exceedance flows to this watercourse. This has the potential further contribute to the already unsustainable nutrient and sediment load and increase flood volumes to increase erosive impact at times of high flows.

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It is also unclear whether all the poultry manure will be processed by the biomass plant or if any will be spread to land locally, similarly how dirty water arisings are to be used in by the biomass plant and how the digestate produced by the plant are to be disposed of. This should be clarified, as any potential increase in nutrient or sediment load to the River Clun will be unsustainable for pearl mussels.

Significant financial resources have been directed at the River Clun to help meet statutory targets, and the AONB Partnership has been closely involved with project work on the river for some years. This development is of concern and should it go ahead would put in jeopardy the conservation objectives set for returning the River Clun SAC to favourable condition. On this basis the Shropshire Hills AONB Partnership objects to this application.

The following policy statements support the position that this application should be refused:

Policy MD12 Natural Environment: 4.115 Policy MD12 sets out in detail the level of protection offered to Shropshire's natural assets.

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. 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;

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; .* (emphasis added)
- iii. priority species;* (emphasis added)
- iv. priority habitats;* (emphasis added)
- v. important woodlands, trees and hedges;*
- vi. ecological networks;* (emphasis added)
- vii. geological assets;*
- viii. visual amenity;*
- ix. landscape character and local distinctiveness*

Yours sincerely

Phil Holden
AONB Partnership Manager