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Your Ref: 19/05509/MAW
Our Ref: ph_140220_19_05509

14th February 2020

Dear Grahame

19/05509/MAW Phased extraction and processing of sand and gravel including the erection of processing plant and ancillary infrastructure, temporary storage of minerals, utilisation of existing rail siding and creation of new access road on to Much Wenlock Road; restoration of the site. Proposed Quarry to the East of Much Wenlock Road, Buildwas, Telford, Shropshire

The AONB Partnership objects to this application, principally on the basis of the scale and proximity of this major development in the immediate setting of the AONB.

The recently revised National Planning Practice Guidance for the Natural Environment stresses the importance of the setting of AONBs:

“How should development within the setting of National Parks, the Broads and Areas of Outstanding Natural Beauty be dealt with?”

Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.”

Paragraph: 042 Reference ID: 8-042-20190721

Revision date: 21/07/2019

In addition, the National Planning Policy Framework requires considerable weight to be given to the setting of heritage assets – in this case Buildwas Abbey: (NPPF para 194 and associated sections)

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

The Shropshire Hills AONB Management Plan 2020-24 has the following policy on setting:

viii) Setting of the AONB

Development in the area around the AONB should be assessed for its impacts on the AONB itself, and also take account of the landscape quality of the setting of the AONB. Measures to consider and mitigate such impacts should include where required Landscape and Visual Impact Assessments; care over orientation, site layout, height and scale of structures and buildings; consideration of the landscape, land uses and heritage assets around and beyond the development site; careful use of colours, materials and non-reflective surfaces; restraint and care in the and use of lighting.

We notice that the LVIA identifies the AONB as of very high sensitivity, but we do not agree with the conclusion that the magnitude of effect is only medium adverse.

The LVIA document quotes the Statements of Environmental Opportunities for the Shropshire Hills National Character Area (NCA) but does not identify the conflicts between this proposed development and these statements. For example:

SEO 1: Protect and enhance the unique character of the Shropshire Hills NCA – with its distinctive landforms, outstanding geology and diverse historic environment – to provide and maintain a sense of place, enhance biodiversity, and promote an enhanced understanding and enjoyment of the area. (emphasis added)

The development substantially and permanently affects the landform of the site, and in the upper part this is in a visually prominent location high on the hill. It also affects the historic environment. (Note that this Statement is for the Shropshire Hills NCA and not just for the AONB, and therefore it applies directly to the land to be developed).

Similarly the Historic Environment Good Practice Advice is quoted, but the conflicts of the proposal with this are not identified. For example:

Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset.

The impact on Buildwas Abbey from the existing small quarry is not ameliorated by a much larger quarrying operation, which does further detract from the asset.

And:

.. the economic and social viability of a heritage asset can be diminished if accessibility from or to its setting is reduced by badly designed or insensitively located development. For instance, a new road scheme affecting the setting of a heritage asset, while in some cases increasing the public's ability or inclination to visit and/or use it, thereby boosting its social or economic viability and enhancing the options for the marketing or adaptive re-use of a building, may in others have the opposite effect.

Buildwas Abbey is a visitor site as well as a heritage asset, and tourism is very important to Shropshire. Active industrial sites this close to important visitor attractions do not support tourism and the qualities of the county which people come to experience.

We notice that the ZTVI analysis of during the development refers to areas of high magnitude impact within the AONB. Also that 24 receptors are assessed to receive a Moderate Adverse effect as a result of the proposed development, and that this is largely associated with soil stripping and mineral extraction activities in the western area.

We propose that both the overall impacts of the proposed development, and specifically the impacts on both the AONB and on Buildwas Abbey and their settings, could be substantially ameliorated by reduction in scale of the sand and gravel extraction through drawing in the western development boundary.

Yours sincerely

Phil Holden
AONB Partnership Manager