

0227/1718

Planning Application 17/01033/EIA

RESOLVED: that Bridgnorth Town Council unanimously strongly oppose the application for the following reasons:

1. In view of the sensitivity of this application and the concerns expressed by residents, Bridgnorth Town Council supports the request from Tasley Parish Council that the environmental information submitted be independently reviewed.
2. Bridgnorth Town Council considers that the following concerns warrant refusal of the application as currently presented

2.1. Compliance with policy CS5 (Countryside and Green Belt).

2.1.1. In relation to this proposal, the relevant policy implication appears to be:

“New development will be strictly controlled in accordance with national planning policies protecting the countryside and Green Belt. Subject to the further controls over development that apply to the Green Belt, development proposals on appropriate sites which maintain and enhance countryside vitality and character will be permitted where they improve the sustainability of rural communities by bringing local economic and community benefits, particularly where they relate to..... Agricultural/ horticultural/ forestry/ mineral related development, although proposals for large scale new development will be required to demonstrate that there are no unacceptable adverse environmental impacts” ^[L]_{SEP} (Explanatory note: 4.74 Whilst the Core Strategy aims to provide general support for the land-based sector, larger scale agricultural/ horticultural/ forestry/ mineral related development, including livestock production units, poultry units, greenhouses/ poly tunnels and mineral extraction, can have significant impacts and will not be appropriate in all rural locations.)

2.1.2. The Town Council notes that the proposal would generate 1.5 full-time jobs.

2.1.3. There is no clear statement of why the proposed development is appropriate for this particular location, other than current ownership, and that consideration needs to be given to appropriateness of the location in view of the potential significant impacts of such a development close to the settlement boundary of a large Town.

2.1.4. There is limited availability of arable land locally suitable for the spreading of manure due to the site's location immediately adjacent to a built up area, and the proposal involves the transport of manure to distant locations under production by the applicant and to as yet unidentified locations. This casts doubt upon the suitability of the location.

2.1.5. The development is located close to an existing employment site (Bridgnorth Livestock Market), residential areas of Tasley, and areas which have been scheduled for development under SAMDev. The proximity of proposed development to sites allocated for future housing and employment development may be considered to reduce the desirability of the neighbouring sites for future development and to jeopardise their viability. This suggests that this type of development may be inappropriate at this location.

2.2. Compliance with policy CS6 (Sustainable Design and Development Principles)

2.2.1. The policy sets out a basic objective and a number of actions which Shropshire Council will take to achieve the objective. The basic objective is “To create sustainable places, development will be designed to a high quality using sustainable design principles, to achieve an inclusive and accessible environment which respects and enhances local distinctiveness, and which mitigates and adapts to climate change.”

2.2.2. One of the detailed statements is that this will be achieved by “Requiring all development proposals, including changes to existing buildings, to achieve applicable national standards, or for water use, evidence based local standards as reflected in the minimum criteria set out in the sustainability checklist. This will ensure that sustainable design and construction principles are incorporated within new development, and ^{[L}_{SEP]} that resource and energy efficiency and renewable energy generation are adequately addressed and improved where possible. The checklist will be developed as part of a Sustainable Design SPD”.

The application does not appear to address energy efficiency and we note that it does not address the potential for renewable energy generation through solar panels.

2.2.3. A further detailed statement is that the policy will be achieved by ensuring that all development “Is designed to be adaptable, safe and accessible to all, to respond to the challenge of climate change and, in relation to housing, adapt to changing lifestyle needs over the lifetime of the development in accordance with the objectives of Policy CS11”.

The stated design life of the buildings is 50 years but the application does not appear to address adaptability (for example, in the event of changes in practices in the poultry industry) or the effects of climate change.

2.2.4. The policy requires that all development “Protects, restores, conserves and enhances the natural, built and historic environment and is appropriate in scale, density, pattern and design taking into account the local context and character, and those features which contribute to local character, having regard to national and local design guidance, landscape character assessments and ecological strategies where appropriate”

We do not consider that the development protects, restores, conserves or enhances the natural environment. In particular, although the application includes a landscape character and visual impact assessment it does not clearly demonstrate (e.g. by modelling views) what the visual impact of the proposal would be.

2.2.5. The policy requires that all development “Contributes to the health and wellbeing of communities, including safeguarding residential and local amenity and the achievement of local standards for the provision and quality of open space, sport and recreational facilities.” There are several concerns over whether the proposal either complies or has been demonstrated to comply:

- *There is no obvious positive contribution to the health and wellbeing of the settlement of Bridgnorth, and there are concerns over potential negative impacts (albeit that many of those concerns are related to activities which would be controlled by the environmental permit regime).*
- *There is the potential for adverse health impacts from dust emissions, which could require the submission of a risk assessment to the Environment Agency and may require mitigating measures to be adopted. The applicant has not quantified dust emissions or dispersion. This issue is addressed in the Environment Agency’s EPR 6.09 Sector Guidance Note for Intensive Farming, Chapter 11. In many locations it would appear not to be necessary to do so unless there are sensitive receptors within 100m of the site. However, the guidance does suggest that achievement of the PM₁₀ objectives should be related to existing background levels and notes that “Poultry sheds located in rural areas where background levels are relatively low are less likely to exceed the AQS objective than poultry sheds located near urban areas and busy roads and motorways where levels of PM₁₀ are already quite high”. The site is located within approx. 310m of the A458, roughly 500m of Bridgnorth Livestock Market, 650m from the commencement of the built up area of Tasley at the western extremity of the Wenlock Rise estate, and roughly 2 km from an existing Air Quality Management Area at Pound Street, Bridgnorth. This may indicate that background levels of PM₁₀ should be ascertained and the impact of emissions from the poultry units considered alongside the background levels. Concerns expressed by local residents also suggest that PM_{2.5} emissions should be considered.*

- *The proposal involves the generation of chicken manure, which is proposed to be used as a fertilizer both in the locality and through export to other locations. Manure spreading on the locality could be detrimental to the residential amenity of Tasley and Bridgnorth. In particular, one of the locations at which it is proposed to spread manure (field 2078, sheet SO7093) is immediately adjacent to existing housing. Spreading at this location could not be considered good practice and in any event the field is scheduled for housing development as part of SAMDev site BRID020a and may not be available longer term.*
- *Odour management has been considered, in relation to emissions from the Poultry sheds only. The spreading of litter on fields in the locality would provide additional and contemporaneous sources of odour emission. We do not consider that this should be regarded as separate from the day to day operations of the poultry houses and the overall impact on residential and local amenity should be considered. Further, consideration should be given to any existing background levels of Ammonia.*
- *Biosecurity is a potential concern. It must be assumed that the operation of the site and transport of birds and manure would be carried out in a manner which seeks to prevent the flock's exposure to pathogens and the distribution of any. However whilst the risks may be normal for this type of activity and managed accordingly, the consequences of any breakdown in biosecurity could be greater than would be experienced in other locations. Sensitive locations nearby include the resident human populations of Tasley and Bridgnorth, Bridgnorth Livestock market and its lairage, and the flock of utility White Wyandotte chickens at Boars Head Farm (which is the only breeding flock of this species in the world and as such is an important and irreplaceable reservoir of genetic material).*
- *Residents have expressed concern over the potential for increased levels of flies and vermin. It is understood that these would be site management issues, particularly in relation to the storage of used litter prior to its use as fertilizer. The operation would produce in excess of 2,000 tonnes of used litter a year; it is understood that this would be loaded directly onto vehicles for transport offsite prior to eventual usage as fertilizer, but it is not clear where litter which is proposed to be used at Footbridge Farm and nearby holdings would be stored.. This storage is stated as required to be sheeted, but there are no indications as to where on site the storage would take place. This should be stated and consideration given to a condition about the storage of the material.*

2.2.6. The policy requires that all development "Is designed to a high quality, consistent with national good practice standards, including appropriate landscaping and car parking provision and taking account of site characteristics such as land stability and ground contamination"

Whilst the proposal does include landscaping, there is no clear statement of how this will mitigate the visual and landscape impact (or contribute to dust and odour management) and it is thus not possible to determine whether this is optimal.

2.2.7. The policy requires that all development “Makes the most effective use of land and safeguards natural resources including high quality agricultural land, geology, minerals, air, soil and water”.

We note that the site appears to be Grade 3 farmland, which would normally be considered “High quality”.

3. The Council requests that consideration be given to clarifying the explanatory note (4.74) to policy CS5 to explain the basis for identifying rural locations where “larger scale agricultural/ horticultural/ forestry/ mineral related development” may not be appropriate, or adopting appropriate supplementary planning guidance in relation to such development close to a settlement boundary, during the current Local Plan Review.