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By email only:

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Dear Mr French

**17/05303/MAW: Extraction of sand and gravel (and mineral processing, ancillary works, infrastructure and restoration), at Cannebuff near Shipley, Bridgnorth, Shropshire**

CPRE has grave concerns that the location for the proposal of the extraction of sand and gravel is completely unsuitable, and it supports many of the environmental concerns raised by the numerous objectors.

The location for the proposed development is within the Green Belt and greatly conflicts with its purposes of protecting the countryside. Indeed, it is contrary to Shropshire Council's policy under CS5, which favours considering permitting small scale developments, not very large ones that are the antithesis of the aim to maintain and enhance countryside vitality and character. Policy CS5 further requires large scale new mineral related development to demonstrate that there are no unacceptable adverse environmental impacts, and that is not the case with this proposed development.

Figure 10 on page 122 of Core Strategy indicates that only part of the proposed site is in a Mineral Safeguarding Area. Policy CS20 states that there should be a sustainable approach to mineral working which balances environmental considerations against the needs of the economy and society. This proposal has the opposite effect, and for important environmental reasons is a most inappropriate development at this location.

The specific concerns of CPRE are:

**1. TRAFFIC**

A prominent concern is the significant increase in heavy traffic (estimated by the applicant at about 100 two-way HGV journeys a day) which will exacerbate safety risk along the busy A454 road. Speed control of traffic is already a major problem which is highlighted by the need for so many speed cameras along this stretch of road. The introduction of many more heavy vehicles will only create the possibility of an increase in accidents. Even Shropshire Council's Highway Authority has implied reservations by recommending that the applicant's proposed road access

improvements should be formally approved before planning permission for mineral extraction is granted. CPRE does not consider that there are any road improvements that will sufficiently remove the added risk to safety should mineral extraction on this site go ahead.

## **2. ARBORICULTURE AND WILD LIFE**

The views of the Woodland Trust are fully supported. There is evidence to indicate that the mineral extraction development will result in irreparable damage to trees in an adjacent ancient wood, and will be harmful to protected animal species. Despite reports to the contrary, there are claims from local people that crested newts, badgers and a growing population of bats live in the vicinity, which must be protected.

## **3. WATER LEVELS**

There are justifiable concerns from members of the public that the scheme will cause unacceptable disturbance to the water table. Concerns are that excessive drainage due to the development will result in scenic pools and streams being run dry and worries that farming businesses nearby will be badly affected due to loss of water in bore holes. There is no guarantee that measures to minimise the effect on water levels will be sufficiently successful.

## **4. AIR QUALITY**

There are bound to be marked and unacceptable increases in air pollution arising from mineral extraction activity that will spread dust and soil particles by prevailing winds over a wide area in this protected countryside. No mitigating measure will be enough to prevent the invasive harmful effect on the surrounding environment of air pollution that can cause people health problems.

## **5. NOISE POLLUTION**

Unpreventable noise from machinery and extra traffic will disturb the tranquillity of the countryside and the quality of life in the surrounding area.

## **6. LANDSCAPE AND VISUAL**

There are serious visual impairments to the scenic beauty of the landscape which screening proposals will do little to prevent harmful impact on the countryside.

## **7. POLICY**

As well as the non-compliance with CS5 and CS20 noted above, there is also paragraph 7.2 of the recent Consultation document on the Preferred Scale and Distribution of Development which said, under the sub-heading "Mineral Sites":

*"The availability of sand and gravel resources remains well above the minimum guideline and additional sites have also been allocated in the SAMDev Plan (2015). No additional site allocations are therefore proposed as part of the Local Plan Review."*

This proposed site is therefore not needed, and runs counter to Shropshire Council's own policy, despite the commentary in paragraph 7.3 that *"a number of planning applications for 'windfall' sites or site extensions are expected to be determined during the next year in Shropshire. These resources, if consented, would provide a significant additional boost to the local supply of sand and gravel"*.

## **8. GREEN BELT**

The proposed site is within Land Parcel BA2 within the recent Green Belt Assessment commissioned by Shropshire Council. The conclusion for this Land Parcel was that the Green Belt

here is playing a Strong role in preventing further encroachment of development in the open countryside. There is therefore a presumption against development in this part of the Green Belt.

## **CONCLUSION**

It is noted that the location is not identified by Shropshire Council under MD5, as a site preferred for the extraction of gravel and sand, which would mean to grant planning permission is contrary to its own agreed policy on suitable locations.

Under MD5 of SAMDev the possibility of using existing sites before introducing any new ones should be explored more. The applicant makes it plain that this application, on the far eastern boundary of Shropshire, is made as a replacement for its operations, due to close at the end of 2018, at Seisdon Quarry, which is only 2.7km to the southeast, but which is over the border in the South Staffordshire District Council area. Whilst acknowledging the requirement of counties to share in mineral extraction, this site near Shipley is not suitable to meet shortage of essential demand. In such an event, the view is taken that Shropshire Council, South Staffordshire District Council and Staffordshire County Council should liaise and negotiate with developers to find a more suitable location.

**This is an inappropriate development in the Green Belt with no very special circumstances to justify approval. Only part of the site is in a Mineral Safeguarding Area and the proposal as a whole does not adhere to providing sustainable mineral working as envisaged in Core Strategy 20.**

**This application should be refused.**

Yours sincerely

*Stella and David Voysey*

*On behalf of CPRE Bridgnorth District*