

Committee and date

South Planning Committee

7 February 2017

Development Management Report

Responsible Officer: Tim Rogers

email: tim.rogers@shropshire.gov.uk Tel: 01743 258773 Fax: 01743 252619

Summary of Application

Application Number: 16/02758/FUL Parish: Farlow

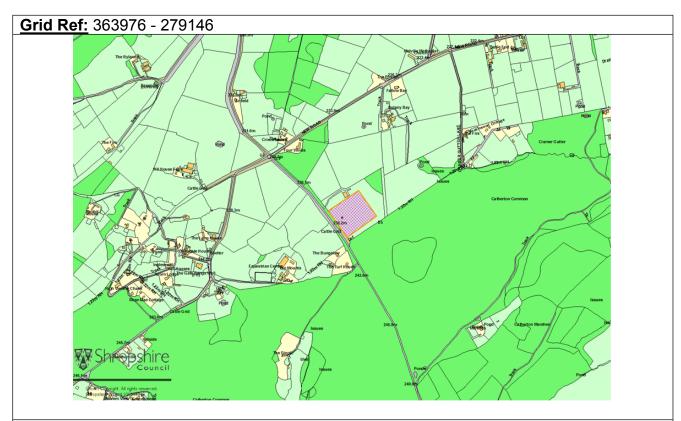
Proposal: Change of use of land to accommodate 4 no. holiday chalets with associated

access and parking; installation of package treatment plant

Site Address: Proposed Holiday Chalets At Upper Marsh Catherton Shropshire

Applicant: Mr Paul Harding

Case Officer: Elizabeth Attwood email: planningdmse@shropshire.gov.uk



© Crown Copyright. All rights reserved. Shropshire Council 100049049. 2016 For reference purposes only. No further copies may be made.

Recommendation:- Refuse for the reasons set out below:

- 1. It is acknowledged that the proposed development would contribute to the rural economy and to the role of Shropshire as a tourist destination to stay. However these benefits are considered to be outweighed by the following environmental harm:

 The principle of the proposed change of use of agricultural land and the erection of four holiday chalets in this remote and unsustainable rural area is contrary to both local and national policy planning policy which aims to locate this type of development adjacent to existing settlements or close to existing facilities. The introduction of significant new built form in to this very open location would detract from the visual amenity of the area and fails to respect the local distinctiveness of this part of Upper Marsh. The proposed log cabins and associated hard landscaping would appear as incongruous additions to the area and as such would result in a detrimental impact upon the character and appearance of the area. Accordingly, the proposed development is contrary to Local Plan policies CS5, CS6, CS16 & CS17 of the adopted Core Strategy and policies MD2, MD11, MD12 of the SAMDev and national guidance contained within the NPPF, in particular paragraphs 7, 17, 28, 58 and 109.
- 2. The application site is adjacent to Catherton Common (SSSI and SWT Reserve) and within both a buffer zone and 'corridor' of the Shropshire Environmental Network. Therefore, the proposed scheme must clearly demonstrate how the development will promote the preservation, restoration and re-creation of priority habitats and ecological networks. It is not considered that the level of suggested ecological enhancement will balance the likely adverse drainage impacts on the SSSI associated with the development. Furthermore, no consideration has been given to the additional recreational pressure on the SSSI and the Shropshire Wildlife Trust Reserve which could occur as a result of the proposed new tourism enterprise. Accordingly, the proposed development is contrary to policies CS17 and CS18 of the adopted Core Strategy and policy MD12 of the SAMDev and national guidance contained within the NPPF and in particular paragraphs 109 and 118.

REPORT

1.0 THE PROPOSAL

- 1.1 The proposal comprises a change of use of land to accommodate four x 8 berth holiday chalets with associated access and parking and installation of package treatment plant.
- 1.2 This is a resubmission of a previously refused application (15/04508/FUL) for a similar proposal which comprised 4 x two storey chalets positioned in a row fronting the public highway. The chalets were 6.2m to the ridge with a crucifix shaped footprint with overall dimensions of 13.5 x 8.0m finished in timber boarding with a slate roof. Surface water drainage was to be via soakaways and foul drainage would be via an existing septic tank which is located to the rear (east) of the site. The application was refused under Officer delegated powers for the following reasons:
 - 1) The principle of the proposed change of use of agricultural and the erection

of four holiday chalets in this remote and unsustainable rural area is contrary to both local and national policy planning policy which aims to locate this type of development adjacent to existing settlements or close to existing facilities. The introduction of new built form in to this very open location would detract from the visual amenity of the area and fails to respect the local distinctiveness of this part of Upper Marsh. The proposed log cabins and associated hard landscaping would appear as incongruous additions to the area and as such would result in a detrimental impact upon the character and appearance of the area. Accordingly the proposed development is contrary to Local Plan policies CS5, CS6, CS16 & CS17 of the adopted Core Strategy and policies MD2, MD11, MD12 of the SAMDev and national guidance contained within the NPPF 2012.

- 2) The application site is adjacent to Catherton Common (SSI and SWT Reserve) and within both a buffer zone and 'corridor' of the Shropshire Environmental Network. Therefore, the proposed scheme must clearly demonstrate how the development will promote the preservation, restoration and re-creation of priority habitats and ecological networks. No information has been submitted in this respect and therefore the proposed development is contrary to policies CS17 and CS18 of the adopted Core Strategy and policy MD12 of the SAMDev and national guidance contained within the NPPF 2012.
- 1.3 The site area is 1.6 acres and the proposed layout indicates 4 x single storey 4 bedroomed chalets positioned in a row fronting the public highway. The resubmitted proposal comprises chalets which would be approximately 3.4m to the ridge with a rectangular shaped footprint with overall dimensions of 20.0 x 6.8m and would be constructed from Western Red Cedar with a fibre cement roof.
- 1.4 These chalets are lower than the previous ones but cover a greater footprint. Each chalet comprises four double bedrooms (two of which are en-suite), a bathroom, storage/utility, kitchen/diner and lounge.
- 1.5 The immediate area surrounding the chalets would be slabbed and one gravel parking space would be provided for each unit. Access off the public highway would be provided in between the Oaks trees and would comprise gravel over Terram Geocell matting to create a permeable drive. Low level lighting is proposed however no further details have been provided.
- 1.6 Surface water drainage would be via soakaways and a sustainable drainage system and foul drainage would be via a Package Treatment Plant. The submitted block plan shows that the existing septic tank and herringbone soakaway which is located to the rear (east) of the site was previously sized to cater for the new Holiday Lets however it is understood that this will be replaced with a package treatment plant.
- 1.7 The site would be developed in two phases of two units. The two units on the northern side will be installed in 2017 followed by the remaining two in 2018.

2.0 SITE LOCATION/DESCRIPTION

- 2.1 The site is situated in open countryside and is adjacent Catherton Common SSSI and Shropshire Wildlife Trust Nature Reserve. The site is relatively flat pasture land and is bordered by post and wire fencing. There is a row of mature Oak, Silver Birch and Holly trees along the western (roadside) boundary and to the east of these a row of recently planted mixed hedging whips.
- 2.1.2 Within the same ownership but outside the site boundary is an agricultural building which is accessed via a gated stoned track. There is a significant number of logs associated with the building stored along the track and adjacent the building.
- 2.1.3 The nearest residential dwelling is located on the opposite side of the road over 100m away to the west.
- 2.1.4 Approximately 1000 Beech, Oak, Ash and Hawthorn whips were planted in 2015 between the application site and the adjacent SSSI.

3.0 REASON FOR COMMITTEE DETERMINATION OF APPLICATION

3.1 The Shropshire Council Division Members have requested that the application is determined by Planning Committee due to the mixed feeling as to whether the application should be supported or not. The Principal Planning Officer in consultation with the Chair and Vice Chair of the South Planning Committee consider that this proposal raises material planning considerations that warrant a Committee determination in this case.

4.0 Community Representations

-Consultee Comments.

Where consultees have submitted more than one set of comments, the latest comments are set out first below in order to show whether any earlier concerns raised have been addressed.

4.1 Farlow Parish Council – Comment:

An application for the erection of 4 holiday chalets at Upper Marsh Catherton was again considered.

There is a considerable amount of additional documentation however it is considered that the issues which led to the Council recommending rejection of the last application have not really been addressed. Although the Council was mindful to again reject this application, in view of its complex nature, together with the sensitivity of the area, the plethora of documentation, the late receipt of some of this documentation and the request by the Applicant for a site meeting with Natural England, it is recommended that this application is considered by full planning committee.

4.2 SC Highways Development Control – No Objections.

The Council's Highway Engineer has no objections subject to conditions in respect of access, parking and turning, gates and disabled access. Informatives in respect of no drainage on to the highway, Mud on highway, Works on, within or abutting the

public highway and Sky glow as suggested.

4.3 SC Drainage – No Objections:

The Council's Drainage Engineer has advised that the drainage proposals are acceptable.

4.3 SC Ecology (23-11-16) – Comment:

Natural England would need to remove their objection before any grant of planning permission.

4.3.1 SC Ecology (09-11-16) – Objection:

Natural England and Shropshire Wildlife Trust have objected to this application and SC Ecology agree with their objections. Insufficient information has been provided to prove that the proposed development will not result in adverse impacts on the SSSI (through foul and surface water drainage and recreational impacts).

Unless sufficient information is submitted to satisfy Natural England's and Shropshire Wildlife Trust's concerns, planning permission should not be granted.

4.3.2 SC Ecology (05-06-16) Comment:

Natural England must be formally consulted and a response received prior to the planning decision.

Welcome the additional native species planting and recommend retention of mature trees and scrub along the western and southern boundaries as habitats for bats, nesting birds and other wildlife.

In the event of planning permission being given recommend conditions in respect of a post construction habitat management plan, a landscaping plan and a lighting plan. Informatives in respect of nests, wild birds and clearance of the site are also suggested

4.4 Shropshire Wildlife Trust (16-11-16) – Object:

The additional area of habitat creation is welcomed but can this be adequately guaranteed for the long term? What kind of monitoring and management can be expected and what enforcement would be realistically achievable? Our concerns re. location and potential recreational pressure remain unaddressed so our objection still stands.

Their position on drainage would be reviewed in the light of expert opinion i.e. from within Shropshire Council or Natural England.

4.4.1 Shropshire Wildlife Trust (01-09-16) – Object:

Recognise and welcome the enhancement suggestions for the site but are not convinced, as yet, that this would balance the potential impacts.

With regard to the drainage issues I would need clearer professional reassurance that the PTP would pose no possible threat to the condition of the SSSI and SWT reserve. As I am not an expert in foul water drainage systems I would hope that

expertise within Natural England, the Environment Agency or Shropshire Council drainage teams might help resolve this issue

See no mention of how visitor pressure will be addressed.

4.4.2 Shropshire Wildlife Trust (25-07-16) – Object:

While an ecological assessment has now been undertaken (an improvement upon the previous application 15/04508/FUL) this has only partly addressed our earlier concerns. Although the findings of the assessment indicate that the ecological value of the site may not be high, it is located within both the corridor and buffer area of Shropshire's Environmental Network and immediately adjacent to a SSSI.

The tree planting mentioned in the design and access statement seems to consist of a mix including Ash, Beech, Cherry and Sycamore which are not particularly appropriate for the location and would appear to have been planted primarily for screening rather than ecological reasons.

The suggested Biodiversity Management Plan makes good suggestions regarding the management of marshy grassland and hay meadow but our experience is that such recommendations are often neglected in the long term.

We are not convinced that the current level of suggested ecological enhancement will balance the possible impacts associated with the development which include:

- Drainage as per our earlier objection there appears to be little detail on the package treatment plant (PTP). Given the proximity of a sensitive SSSI and mire habitat we are concerned that the PTP may not provide an adequate solution. Many PTPs are not designed to treat phosphate and there appears to be a lack of conclusive evidence to suggest that they would be appropriate in close proximity to a SSSI and mire habitat. We also note that Natural England Reports NECR170 and NECR179 both conclude that PTPs require a steady flow of sewage and sites that generate erratic loads such as holiday accommodation may need to install flow balancing systems.
- Additional Recreational Pressure the close proximity of the development to the SSSI and Shropshire Wildlife Trust Reserve is likely to focus visitor pressure on this sensitive area and increase the costs of managing the site.

Operations likely to damage the special interest of Catherton Common include:

- "Dumping, spreading or discharge of any materials"; and
- "Recreational or other activities including motor-cycling, likely to damage the stream margins, bogs and heathland vegetation".

We would therefore recommend that Natural England is consulted on this application.

While we recognise the importance of tourism for the economy of Shropshire, policy is clear that suitable locations in and around existing settlements should be used.

4.5 Natural England (25-01-17) – Objection Maintained:

This application is in close proximity to Catherton Common Site of Special Scientific Interest (SSSI). Natural England objects on the grounds that the application, as submitted, is likely to damage or destroy the interest features for which Catherton Common has been notified. Our concerns are set out below.

We note the response from Churton Ecology to the points we made in our previous response however they do not appear to address our concerns.

They have highlighted potential damage to the site through the foul drainage proposed which we agree with. In addition they have suggested that they do not have the expertise to comment on the impacts which suggests the applicant should consider additional expertise.

Natural England's internal wetland specialist has suggested that the habitat interest feature of the SSSI has no tolerance for increased levels of nutrients and the developer has yet to provide evidence that the proposals will not lead to increases or that alternative/less damaging sites have been considered and ruled out. Additionally recreational impacts have yet to be considered/assessed as we have previously advised.

In summary the area of the SSSI likely to be affected is the most vulnerable and insufficient evidence has been submitted to demonstrate that the SSSI interest features will not be damaged or destroyed through the foul drainage proposals or recreational pressure. The applicant has also not demonstrated that the mitigation hierarchy has been applied through consideration of alternative sites.

If your Authority is minded to grant consent for this application contrary to the advice relating to Catherton Common SSSI contained in this letter, we refer you to Section 28I (6) of the *Wildlife and Countryside Act 1981* (as amended), specifically the duty placed upon your authority, requiring that your Authority;

- □ Provide notice to Natural England of the permission, and of its terms, the notice to include a statement of how (if at all) your authority has taken account of Natural England's advice, and
- □ Shall not grant a permission which would allow the operations to start before the end of a period of 21 days beginning with the date of that notice.
- 4.5.1 Natural England (22-09-16) Objection Maintained Further information required.

We note the additional information and comments in relation to our previous response however we still believe further information is needed to understand the implications of the proposed development on the SSSI. Our previous comments were:

"Foul and surface water drainage – We note that the application proposes the installation of a package treatment plant to serve the development however the information does not appear to provide details of the quality of treated effluent resulting from the package treatment plant. There will also be soakaways for surface water drainage however the locations of these soakaways and the interactions between foul and surface water and their potential effects on the SSSI have not been considered. We note that the Ecology Report undertaken by Churton

Ecology and dated June 2016 identifies that without appropriate precautions that drainage from the site may negatively affect the SSSI however it does not appear to state what measures should be taken.

Recreational impacts – the site may be sensitive to recreational impacts however it does not appear that consideration of this potential impact has been included within the proposal. We understand that the area of SSSI adjacent to the site is amongst the most sensitive."

The additional information and comment includes specification from the manufacturers of the proposed package treatment plant however there is no interpretation of how the treated effluent may affect SSSI features or to demonstrate that the SSSI will not be affected. Indeed point 1 the response from Churton Ecology states that while they have highlighted drainage as an area of concern they have not commented on the likely impacts.

We note the email from the agent which makes reference to a number of trees planted on the site to ensure biodiversity as a whole is not lost as a result of the proposals ww welcome the intention however they are not within the SSSI and the planting of '000s of trees' may itself have a negative impact on wetland habitats within the SSSI. Also, with reference to the mitigation hierarchy compensatory measures i.e new habitat to make up for damage / loss should be as a last resort after avoidance and mitigation.

If the applicants / agents wish to discuss the proposals directly with Natural England, we would advise using our Discretionary Advice Service.

The first step is for the developer to fill out a simple form, so we can register their interest, and make sure they have the right adviser for their case. Please visit our website for more information and a downloadable request form here.

We also note the comments from Shropshire Wildlife Trust who consider that further information in relation to drainage and recreational impacts is necessary and would recommend you have regard for their concerns.

Should the application change, or if the applicant submits further information relating to the impact of this proposal on the SSSI aimed at reducing the damage likely to be caused, Natural England will be happy to consider it, and amend our position as appropriate.

4.5.2 Natural England (27-07-16) – Object: Further information required.

This application adjacent to Catherton Common Site of Special Scientific Interest (SSSI). Natural England objects to this development on the grounds that the application, as submitted, is likely to damage or destroy the interest features for which Catherton Common has been notified. Our concerns are set out below.

Catherton Common SSSI is an extensive area of wet and dry heathland, the diversity of the area is increased by the presence of streams and wet flushes and as such water quality is critical to the nature of the SSSI. At present the unit closest

to the proposed development is in Unfavourable – Recovering condition.

At present we believe further information is needed to understand the implications of the proposed development on the SSSI

Foul and surface water drainage – We note that the application proposes the installation of a package treatment plant to serve the development however the information does not appear to provide details of the quality of treated effluent resulting from the package treatment plant. There will also be soakaways for surface water drainage however the locations of these soakaways and the interactions between foul and surface water and their potential effects on the SSSI have not been considered. We note that the Ecology Report undertaken by Churton Ecology and dated June 2016 identifies that without appropriate precautions that drainage from the site may negatively affect the SSSI however it does not appear to state what measures should be taken.

Recreational impacts – the site may be sensitive to recreational impacts however it does not appear that consideration of this potential impact has been included within the proposal. We understand that the area of SSSI adjacent to the site is amongst the most sensitive.

Additionally clarification of the ecology report would be useful. The site description suggests that there is little of interest, however for the 'site', it gives a species list though, without frequencies which include four high value indicators present including autumn hawkbit, bird's foot trefoil, yellow rattle and common spotted orchid. The field may qualify as high value Lowland Meadow and Pasture priority/BAP habitat if there are two frequent and two occasional indicators. Additionally damp pockets are described with rushes including jointed, lesser spearwort, and three sedge species, which could indicate this area as high value purple moor grass Rush pasture priority habitat http://csguidance/Process/HT-supported/Documents/cs_behta_manual_part2.pdf.

Should the application change, or if the applicant submits further information relating to the impact of this proposal on the SSSI aimed at reducing the damage likely to be caused, Natural England will be happy to consider it, and amend our position as appropriate.

If your Authority is minded to grant consent for this application contrary to the advice relating to Catherton Common SSSI contained in this letter, we refer you to Section 28I (6) of the *Wildlife and Countryside Act 1981* (as amended), specifically the duty placed upon your authority, requiring that your Authority;

□ Provide notice to Natural England of the permission, and of its terms, the notice to include a statement of how (if at all) your authority has taken account of Natural England's advice, and

□ Shall not grant a permission which would allow the operations to start before the end of a period of 21 days beginning with the date of that notice.

Other advice

We would expect the Local Planning Authority (LPA) to assess and consider the other possible impacts resulting from this proposal on the following when determining this application:

□ local sites (biodiversity and geodiversity)
□ local landscape character
local or national biodiversity priority habitats and species.

Natural England does not hold locally specific information relating to the above. These remain material considerations in the determination of this planning application and we recommend that you seek further information from the appropriate bodies (which may include the local records centre, your local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document) in order to ensure the LPA has sufficient information to fully understand the impact of the proposal before it determines the application. A more comprehensive list of local groups can be found at Wildlife and Countryside link.

Biodiversity enhancements

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the NPPF. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.

Public Comments

- 4.6 A site notice and 18 direct neighbour letters have publicised the application; Five letters of objection have been received. The issues raised are:
 - I was very surprised and disappointed to see a new application for this large scale green field development considering the refusal for previous application and the strength of feeling and no local support.
 - The only change in this new application is the roof height has been lowered slightly and the front elevation has increased to a massive 20m (significantly more than an average detached house). I have no idea how a 20m long building with 4 double bedrooms and 3 bathrooms can be described as "a caravan". My previous comments therefore still stand (see application 15/04508/FUL) and I would like to add the following based on comments in the submitted Planning Statement-
 - This development will significantly degenerate the qualities and features that make this area unique. The location is adjacent (the new buildings are less than 30m away) to an important reserve, Catherton Common. This is over 300 Hectares of tranquil and unspoilt open land.
 - This field is also part of an important buffer zone between the common and farmland. Without vigorously maintaining this buffer and wildlife corridor the common will increasingly become an isolated patch and its nature as a

?

?

?

unique wildlife haven will be affected. The fields, adjacent to the common, have for hundreds of years been used as grass keeps and hay making for the grazing animals when they are taken off the common. The complex ecosystem of the area has developed to use and rely on this unique feature.

Apart from the holiday lets in the area, which are all based on existing and appropriate buildings adjacent to the owner's properties, there are no tourism-based facilities in the immediate area. The nearest pub is 2 miles away and is not a tourism-based business. This development will not improve local services through economic growth as stated in the statement. The only benefit will be financial profit to the landowner. There may be a demand for a part time cleaner but the area already has a number of holiday lets that already struggle to find someone local to provide this service.

This field is no longer directly linked to a local farming business (it was sold to the current owner as a separate parcel of land). It has already suffered one diversification activity (forestry business). This is more compatible with the rural nature of the area and has been concentrated in one corner of the field leaving the rest unspoilt (until now). The rest of this historic field should be left as pasture.

Any new green field housing development in the area must be prioritised to meet local housing demands and not for tourism. Demands for tourism can and are being met by more appropriate accommodation adjacent to existing owner's properties. In the parish plan any new housing is prioritised for single plot exception sites where there is proof of demand for a local family member. This tourism development is not compatible with this aim as well as not even being linked to any settlement areas.

The 3 examples submitted of similar development (I could only see 2) are not similar. The Kinlet example is not part of an ANOB or adjacent to a unique area of open common land and the Craven Arms example is for Yurts and a very different proposal.

I hope the planners will consider and take into account how the proposed development will affect the area immediately and in the future, as it is likely if planning consent is given, in the way of these things, further planning applications will be made to enlarge the properties, build more properties and eventually get permanent residential occupancy.

Reading the application it is clear that the applicant bought the field with the sole purpose of developing it, this is confirmed as they planted trees in preparation. The land was a field not a development site and what is worse it is in an area of outstanding natural beauty. There are lots of holiday rental properties in the area and also caravan parks, chalet parks and sites, where holiday makers can stay and enjoy the area. If there is a requirement for more holiday accommodation at all surely this is the wrong place for it.

We were amazed to see yet another application for this development. The previous application for 4 two bedroom cabins with 180 feet of building frontage has now been replaced with 4 four bedroom cabins with over 260 feet of building frontage which will be larger than many of the local permanent dwellings.

At night with dark skies and no street lighting properties are difficult to locate therefore bright lights and signage would be necessary along the

?

frontage and beyond. This would deter nocturnal and retiring wildlife.

All of our previous objections on application 15/04508/FUL still stand.

Catherton Common is an area of outstanding beauty with wonderful flora and fauna to behold. It homes many species of wildlife and is visited regularly by wildlife enthusiasts. Why spoil this area for the wildlife such as the Curlews who nest here?

The chalets will be adjacent to a commercial property which has sawmills being used late into the night and weekends and regular bonfires are lit, why would anyone wish to stay on a commercial yard when there are ample caravan sites and holiday lets in the area?

One lady who stays in a local holiday let regularly throughout the year and walks daily across the common comes from the edge of the Yorkshire Moors and always comments how fresh the air is and says that it is cleaner than that of the Yorkshire Moors. Why spoil this clean fresh air with 4 chalets and all of the additional carbon emissions which will be brought in to the area by the number of cars visiting each chalet.

I read with interest all of the comments in support of this application, but notice that not one of them actually live on Catherton Common and certainly not opposite the proposed site. Would any of them like this being built in full view of their home. The drive down to the crossroads is continually needing to be repaired due to potholes appearing from the heavy traffic from this wood yard which has resulted in our family alone having to have 7 road springs repaired on our vehicles over the last 3 years. This application is for "holiday chalets" will this turn into a "mini housing estate" over the next few years. The Council should listen to the concerns of those parishioners who it will have the most impact on as opposed to those who live nowhere near and don't use Catherton Common on a regular basis.

This proposed site will have a significant impact on our beautiful wildlife which is the main reason why it should not be allowed to go ahead.

4.7 Nine letters of support have been received. The issues raised are:

Surely this would bring business into the local area. People coming to stay will support the local pubs and shops, Cleobury Country Market etc. I understand the views on protecting the common but visitors will walk the area and appreciate our beautiful countryside - we are lucky to live somewhere which has SSSI zones and such natural beauty and it is understandable that others would wish to visit.

The applicant is a very well respected member of the local community, who has always supported the rural economy in which he both lives and works. I too was born and raised in the local community and feel that this development, and the visitors it will attract, will be of great benefit to businesses in the surrounding towns and villages. Any new opportunities we can provide to bring new visitors into our beautiful landscape should be welcomed, especially in our current economic climate.

I am a local business person and I run a very similar business as the one proposed by Mr Harding. I have a wooden holiday chalet a few miles away from the proposed site, also next to AONB, SSI and within the Shropshire hills. We have been running for four and half years and every year our business has grown rapidly. Tourism is such an important factor in

?

?

the local rural economy and something that needs to be supported and encouraged. We are fully booked from April to November with many months through the winter also booked. I am regularly having to turn down bookings as the dates are already taken.

My business, as would Mr Harding's, supports the local rural economy in many ways. We regularly use builders, plumbers, electricians for general maintenance. We have regular contract with a local laundry company, we use a grass maintenance company for landscaping, a local IT person for our website, local photographer and printers for advertising. We use a local bakers for guest's cakes, local butchers for guest's breakfasts. Shropshire and the surrounding areas have a vast array of amazing tourist attractions which we actively promote to all of our guests as well as local restaurants, pubs, cafe's, bars, leisure centres, cinema's and of course shops.

As a local businessman and Chair of School Governors it is vital for the local economy that we attract and support tourism and therefore projects of this nature.

I am well aware of the proposed location of these chalets as I have lived around this area for all of my life and I'm confident that they would be constructed in such a manner as to merge with the local environment and therefore not detract from the wonderful countryside we are fortunate to live in.

I feel that the holiday chalets will be of a high quality and whilst being sympathetic to the area will also be in line with the local character. I strongly believe that the chalets will not in any way detract from their surroundings, rather they will enhance it. As the chalets will be aimed at the top end of the tourist market they will undoubtedly attract affluent visitors who will add a welcome boost to the local economy. In current times initiatives like this that bring a financial return to communities are sorely needed.

Having seen from afar how Mr Harding has built his current company I believe he has the right attributes to make a success of the holiday chalets should his application be approved.

Without a correct balance between Tourism, Environment, Wildlife, Housing and Work for local families and the community, this community will flounder.

It is very disappointing to read some of the objections from other locals which appear to comment incorrectly in elements of the project and have done throughout. His site boundary with the common has been repaired along with the plantation of native trees which will add to the biodiversity of the site as well as a screen (both visual and auditory) which should answer some of the objections. A number of the objections make it sound as though the site is being built on the common which it clearly is not but is adjacent to the common and with the building of the log cabins and the wood plantation, this will assist with the local wildlife in stable ecosystems, and allow visitors to experience the common and surrounding. With the local shoots and horse trekking and other local outdoor experiences available the increase in such projects bringing more people to the area can only help with local businesses (both new and old) throughout the year with all the area has to offer across all the seasons.

- The applicant is a local person, and the proposed site is private and well screened.
- My support comes from the business angle. There is a market for more holiday lets in this area, be they in the form of cottages/chalets or whatever, as so many love to visit the South Shropshire and on up into the Shropshire Hills area.

I understand the objections listed, and the need to protect the ecological environment of Catherton Common, however, new local business needs to be supported and encouraged. The Planning Authority must create a viable way forward so as to accommodate all these local needs. Employment in rural areas is in great demand and opportunities to create more must be considered seriously.

5.0 THE MAIN ISSUES

Principle of development
Visual Impact and Landscaping
Residential Amenity
Highway Safety
Ecological Impact
Drainage Impact

6.0 OFFICER APPRAISAL

6.1 Principle of development

- 6.1.1 Paragraph 28 of the NPPF supports a prosperous rural economy and advises that a positive approach to sustainable development should be taken. This includes;
 - supporting the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;
 - promoting the development and diversification of agricultural and other landbased rural businesses;
 - supporting sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres.
- 6.1.2 Policy CS5 advises 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 small scale development diversifying the rural economy; including farm diversification; and the retention and appropriate expansion of an existing established business.
- 6.1.3 Policy CS13 recognises the importance of supporting rural enterprise and diversification of the economy in particular areas of economic activity associated

inter alia in respect of green tourism (low impact tourism). The proposal is not considered to be green tourism as is simply 'standard tourism'.

- 6.1.4 Policy CS16 requires visitor accommodation to be in accessible locations served by a range of services and facilities. In rural areas proposals must be of an appropriate scale and character for their surroundings, be close to or within settlements, or an established and viable tourism enterprise where accommodation is required. As noted above in order to be considered sustainable, Government guidance contained within the NPPF rural tourism is expected to respect the character and appearance of the countryside. The provision of visitor facilities should be in appropriate locations where identified needs are not met by existing facilities in rural service centres.
- 6.1.5 Policy MD11 states that holiday let development that does not conform to the legal definition of a caravan will be resisted in the countryside. Broadly speaking the legal definition of a caravan covers any structure designed or adapted for people to live in which is capable of being moved from one place to another (whether by being towed or by being transported on a motor vehicle or trailer) and any motor vehicle. This includes twin units separately constructed and designed for assembly on site, provided that the twin unit is physically capable of being moved or transported on a motor vehicle or trailer. The log cabin supplier has specification confirms that:
 - The cabins are constructed from massive natural logs with precision joinery,
 - The Kareela caravan design is constructed in the manufacturers yard and assembled on site in two sections, each on a rolling chassis. The final act of construction is to connect the two sections together. This is common industry practice for 20m units (the full length allowed under the Caravan Act) because of the cost and safety implications of moving 20m sections by road. The two sections can be moved again at a later date.
- 6.1.6 A letter of support from Hoseasons (holiday rental company) which advises that the Heart of England is a popular location for holiday accommodation and high quality lodges would attract a more affluent customer and that there is an overriding demand for accommodation in the area has been submitted with the application.
- 6.1.7 The Design and Access Statement makes reference to superseded policies which are noted however they are not material planning considerations which can be taken into account in determining the application. Examples of previously approved tourism related applications have been submitted however these applications were determined prior to the adoption of the Core Strategy and the SAMDev.
- 6.1.8 Previous planning policy supported new tourism enterprises in the rural area (as stated in the Design & Access Statement and demonstrated by the historic planning approvals referenced by the agent). Notwithstanding, support from Hoseasons and that fact that despite their size the cabins fall under the definition of a caravan as noted above *current* policies require visitor accommodation to be in accessible locations served by a range of services and facilities. In rural areas, proposals must

be close to or within settlements, or an established viable tourism enterprise where accommodation is required (CS16). Proposals which would result in isolated, sporadic, out of scale, or which may either individually or cumulatively erode the character of the countryside, will not be acceptable (CS5).

6.1.9 The proposed development comprises a greenfield site in a rural location which officers maintain is an isolated location with no nearby amenities. It would not be close to an established and viable tourism enterprise where it has been demonstrated accommodation is required. The proposal is therefore considered unsustainable and contrary to both local and national policy and guidance. Accordingly, the principle of the proposal is considered contrary to the aforementioned policies.

6.2 Visual Impact and Landscaping

- 6.2.1 Paragraph 64 of the NPPF states that; Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions
- 6.2.2 Policy CS6 seeks to ensure that development is appropriate in scale, density, pastern and design taking into account the local context and character.
- 6.2.3 Policy CS16 notes that the rural and tranquil nature of Shropshire's countryside is a key component of Shropshire's attractiveness as a visitor destination, it is therefore vital that all tourism proposals, particularly in rural areas, is compatible with their location so that Shropshire's unique character and tranquillity is retained. Further to the requirements in Policy CS16, policy MD11 recognises that chalets and log cabins have a greater impact on the countryside and schemes should be landscaped and designed to a high quality.
- 6.2.4 Policy CS17 aims to ensure that all development contributes to the local distinctiveness, having regard to the quality of Shropshire's environment, including landscape.
- 6.2.5 Policy MD2 requires development to respond effectively to local character and distinctiveness, it should not have a detrimental impact on existing amenity value but respond appropriately to the context in which it is set. As such, new development should respect the existing pattern of development, both visually and in relation to the function of spaces, retain and enhance important views and landmarks and respond appropriately to the local environmental and historic assets.
- 6.2.6 Policy MD11 of the SAMDev states that; Tourism, leisure and recreation development proposals that require a countryside location will be permitted where the proposal complements the character and qualities of the site's immediate surroundings, and meets the requirements in Policies CS5, CS16, MD7, MD12, MD13 and relevant local and national guidance. In addition, all proposals should to be well screened and sited to mitigate the impact on the visual quality of the area through the use of natural on -site features, site layout and design, and landscaping and planting schemes where appropriate.

- 6.2.7 Policy MD12 supports development which contributes positively to the special characteristics and local distinctiveness of an area.
- 6.2.8 The site is currently an agricultural field and despite the existing trees which are growing along the roadside boundary, and the additional whips which have been planted, it is very open and has no meaningful screening. The scale, design, appearance and siting of the proposed large log cabins would result in an incongruous addition in this very rural location, and would be at odds with the open character and appearance and tranquillity of the area. The log cabins would appear as alien features and this together with the domestication of the immediate surrounding land by the creation of patio areas, access drives and parking would result in an adverse impact upon the local distinctiveness and landscape of the area.
- 6.2.9 The proposal is therefore considered contrary to Local Plan policies CS5, CS6, C16 and C17, MD2, MD11& MD12 and national guidance contained within the NPPF which aims to improve the character and quality of an area and the way it functions and conserve and enhance the natural environment by protecting and enhancing valued landscapes.

6.3 Impact on Residential Amenity

6.3.1 Given the separation distances between the proposed site and the dwellings in the area it is considered that there would be no adverse impact up residential amenity of the scattered dwellings in the wider locality. Accordingly, there is no conflict with policy CS6 which aims to safeguard residential amenity.

6.4 Impact on Highway safety

- 6.4.1 Policy CS6 requires all development to be safe and accessible to all and have appropriate parking. SC Highways has commented that; The proposed site is a field off the Hill Houses to Catherton road, a narrow, two lane, rural, 'C' class road (C6248/10) which is governed by a 60mph speed limit. The field is just north of the boundary of Catherton Common which is marked on the road with a cattle grid.
- 6.4.2 The site is located on a field which already has agricultural industry in the form of timber management and storage. The proposal is for four chalet holiday homes to be sited behind an existing screen of trees with an access onto the Catherton road just north of the cattle grid.
- 6.4.3 The site is in an isolated location in an area of South Shropshire which has very scattered farms and dwellings and very small hamlets. The nearest town with a variety of facilities is Cleobury Mortimer approximately 5 miles south-east of the proposed site.
- 6.4.4 The field is level with the road and there is good visibility in both directions from the proposed access. The first few metres of the access, from the road should be made to hard standing to prevent the re-location of loose material onto the road this is a road safety issue as it could have an effect on vehicle braking.

6.4.5 Although the road carries the national speed limit, the expectation of the amount and frequency of traffic is low. The proposal is unlikely to significantly adversely affect highway safety or local conditions.

6.5 Ecological Impact

- 6.5.1 This proposed development site is within the Environmental Network and as such the proposed scheme must clearly demonstrate how the development will 'promote the preservation, restoration and re-creation of priority habitats and ecological networks' as required by paragraph 117of the NPPF..
- 6.5.2 Furthermore, Paragraph 118 of the NPPF sets out that local planning authorities should aim to conserve and enhance biodiversity, and that development likely to have an adverse effect on a Site of Special Scientific Interest should not normally be permitted. As mentioned above Core CS17 requires development to protect and enhance the diversity, high quality and local character of Shropshire's natural environment, and to have no adverse effect on ecological assets.
- 6.5.3 Policy MD12 relates to the conservation, enhancement and restoration of Shropshire's natural assets. It this respect it must be demonstrated that the social or economic benefits of development clearly outweigh the harm to natural assets.
- 6.5.4 Natural England and Shropshire Wildlife Trust both maintain their objections after considering additional information being submitted by the applicant's agent and ecologist. Natural England's response to the latest additional information submitted by the applicant's ecological consultants is set out at 4.5 above.
- 6.5.6 Their consultation responses are noted below;
- 6.5.7 Natural England: This application is adjacent to Catherton Common Site of Special Scientific Interest (SSSI). Natural England objects to this development on the grounds that the application, as submitted, is likely to damage or destroy the interest features for which Catherton Common has been notified. Our concerns are set out below.
- 6.5.8 Catherton Common SSSI is an extensive area of wet and dry heathland, the diversity of the area is increased by the presence of streams and wet flushes and as such water quality is critical to the nature of the SSSI. At present the unit closest to the proposed development is in Unfavourable Recovering condition.
- 6.5.9 Foul and surface water drainage We note that the application proposes the installation of a package treatment plant to serve the development however the information does not appear to provide details of the quality of treated effluent resulting from the package treatment plant. There will also be soakaways for surface water drainage however the locations of these soakaways and the interactions between foul and surface water and their potential effects on the SSSI have not been considered. We note that the Ecology Report undertaken by Churton Ecology and dated June 2016 identifies that without appropriate precautions that drainage from the site may negatively affect the SSSI however it does not appear

to state what measures should be taken.

- 6.5.10 Recreational impacts the site may be sensitive to recreational impacts however it does not appear that consideration of this potential impact has been included within the proposal. We understand that the area of SSSI adjacent to the site is amongst the most sensitive. The additional information and comment includes specification from the manufacturers of the proposed package treatment plant however there is no interpretation of how the treated effluent may affect SSSI features or to demonstrate that the SSSI will not be affected. Indeed, point 1 the response from Churton Ecology states that while they have highlighted drainage as an area of concern they have not commented on the likely impacts.
- 6.5.11 We note the email from the agent which makes reference to a number of trees planted on the site to ensure biodiversity as a whole is not lost as a result of the proposals we welcome the intention however they are not within the SSSI and the planting of '000s of trees' may itself have a negative impact on wetland habitats within the SSSI.
- 6.5.12 Also, with reference to the mitigation hierarchy compensatory measures i.e. new habitat to make up for damage / loss should be as a last resort after avoidance and mitigation.
- 6.5.13 If your Authority is minded to grant consent for this application contrary to the advice relating to Catherton Common SSSI contained in this letter, we refer you to Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended), specifically the duty placed upon your authority, requiring that your Authority;
 - Provide notice to Natural England of the permission, and of its terms, the notice to include a statement of how (if at all) your authority has taken account of Natural England's advice, and
 - Shall not grant a permission which would allow the operations to start before the end of a period of 21 days beginning with the date of that notice.
- 6.5.14 Shropshire Wildlife Trust has commented;
- 6.5.15 While an ecological assessment has now been undertaken (an improvement upon the previous application 15/04508/FUL) this has only partly addressed our earlier concerns. Although the findings of the assessment indicate that the ecological value of the site may not be high, it is located within both the corridor and buffer area of Shropshire's Environmental Network and immediately adjacent to a SSSI.
- 6.5.16 The tree planting mentioned in the design and access statement seems to consist of a mix including Ash, Beech, Cherry and Sycamore which are not particularly appropriate for the location and would appear to have been planted primarily for screening rather than ecological reasons.
- 6.5.17 The suggested Biodiversity Management Plan makes good suggestions regarding the management of marshy grassland and hay meadow but our experience is that such recommendations are often neglected in the long term.

- 6.5.18 We are not convinced that the current level of suggested ecological enhancement will balance the possible impacts associated with the development which include:
 - Drainage as per our earlier objection there appears to be little detail on the package treatment plant (PTP). Given the proximity of a sensitive SSSI and mire habitat we are concerned that the PTP may not provide an adequate solution. Many PTPs are not designed to treat phosphate and there appears to be a lack of conclusive evidence to suggest that they would be appropriate in close proximity to a SSSI and mire habitat. We also note that Natural England Reports NECR170 and NECR179 both conclude that PTPs require a steady flow of sewage and sites that generate erratic loads such as holiday accommodation may need to install flow balancing systems.
 - Additional Recreational Pressure the close proximity of the development to the SSSI and Shropshire Wildlife Trust Reserve is likely to focus visitor pressure on this sensitive area and increase the costs of managing the site.
- 6.5.19 Operations likely to damage the special interest of Catherton Common include:
 - 2 "Dumping, spreading or discharge of any materials"; and
 - ② "Recreational or other activities including motor-cycling, likely to damage the stream margins, bogs and heathland vegetation".

While we recognise the importance of tourism for the economy of Shropshire, policy is clear that suitable locations in and around existing settlements should be used.

6.5.20 The applicant's ecology Consultants, in response to the concerns raised by Natural England about the likely/possible impacts of the proposed drainage on the SSSI have responded that they are not experts in foul water drainage systems to be able to give details of the necessary precautions, and hope that the expertise within Natural England, the Environment Agency or Shropshire Council drainage teams might help to resolve this issue. They comment that the Cramer Stream appeared to be already polluted where it enters the SSSI from the north at a point 230m east of the development field, and they assume Natural England are aware of this situation.

They comment that there is no water course within the development field or along the north boundary of the SSSI adjacent to the development field or the adjacent field to the east. They acknowledge that ultimately water must drain from the application site into Cramer Gutter, but suggest it is highly unlikely to reach the SSSI until it has filtered through the eastern part of the development field and the whole length of the adjacent field to the east; a water course developing towards the south-east of this latter field where any water from these fields (and from others to the north) will enter the Cramer Gutter stream/SSSI.

The applicant's ecological consultants consider that the proposed tree planting is unlikely to affect the hydrology of the SSSI, because pockets of woodland are already a feature of the area both on the SSSI and along the roadside fronting the application site. They comment that whilst 0.25ha of semi-improved grassland would be lost to cabins and 0.4ha would be disturbed but re-instated as grassland, over 1ha of existing grassland and 0.25ha of existing mire/acid grassland will be conserved and enhanced. Thus the loss of 0.25ha of grassland would be compensated for by an increase in biodiversity of over 1.5ha of existing habitats, with restoration of another 0.4ha.

With regard to new tree planting, the applicant's ecological consultants comment that they did not include this in compensation/mitigation as it already exists (albeit only since 2014), but state that it is worth noting this will result in additional loss of semi-improved grassland (approximately 0.5ha overall, with only half of this in the development field) but at the same time will provide new habitat of some ecological value.

6.5.21 Natural England has responded to the above comments from the applicant's ecological consultants and may be found at 4.5 above. In summary the area of the SSSI likely to be affected is the most vulnerable and insufficient evidence has been submitted to demonstrate that the SSSI interest features will not be damaged or destroyed through the foul drainage proposals or recreational pressure. The applicant has also not demonstrated that the mitigation hierarchy has been applied through consideration of alternative sites. There is insufficient information on the quality of the treated effluent from the package treatment plant and interaction between foul and surface water soakaways, and what precautions, if any, would be practical to safeguard the SSSI.

6.6 Drainage Impact

6.6.1 Core Strategy policy CS18 relates to sustainable water management. SC Drainage considers that the proposed Package Treatment Plant (PTP) is acceptable. However, it should be noted that any potential impact upon the adjacent SSSI and SWT reserve does not fall within the remit of SC Drainage and comments are made only from an engineering point of view.

7.0 CONCLUSION

7.1 It is acknowledged that the proposed development would contribute to the rural economy and to the role of Shropshire as a tourist destination to stay. However these benefits are considered to be outweighed by the following environmental harm: The principle of the proposed change of use of agricultural land and the erection of four holiday chalets in this remote and unsustainable rural area is contrary to both local and national policy planning policy which aims to locate this type of development adjacent to existing settlements or close to existing facilities. The introduction of significant new built form in to this very open location would detract from the visual amenity of the area and fails to respect the local distinctiveness of this part of Upper Marsh. The proposed log cabins and associated hard landscaping would appear as incongruous additions to the area and as such would result in a detrimental impact upon the character and

appearance of the area. Accordingly, the proposed development is contrary to Local Plan policies CS5, CS6, CS16 & CS17 of the adopted Core Strategy and policies MD2, MD11, MD12 of the SAMDev and national guidance contained within the NPPF 2012.(Paragraphs 7, 17, 28, 58 and 109).

- 7.2 The application site is adjacent to Catherton Common (SSSI and SWT Reserve) and within both a buffer zone and 'corridor' of the Shropshire Environmental Network. Therefore, the proposed scheme must clearly demonstrate how the development will promote the preservation, restoration and re-creation of priority habitats and ecological networks. It is not considered that the level of suggested ecological enhancement will balance the likely adverse drainage impacts on the SSSI associated with the development. Furthermore, no consideration has been given to the additional recreational pressure on the SSSI and the Shropshire Wildlife Trust Reserve which could occur as a result of the proposed new tourism enterprise. Accordingly, the proposed development is contrary to policies CS17 and CS18 of the adopted Core Strategy and policy MD12 of the SAMDev and national guidance contained within the NPPF 2012.(Paragraphs 109 and 118).
- 8.0 Risk Assessment and Opportunities Appraisal

8.1 Risk Management

There are two principal risks associated with this recommendation as follows:

- As with any planning decision the applicant has a right of appeal if they disagree with the decision and/or the imposition of conditions. Costs can be awarded irrespective of the mechanism for hearing the appeal, i.e. written representations, hearing or inquiry.
- The decision may be challenged by way of a Judicial Review by a third party. The courts become involved when there is a misinterpretation or misapplication of policy or some breach of the rules of procedure or the principles of natural justice. However, their role is to review the way the authorities reach decisions, rather than to make a decision on the planning issues themselves, although they will interfere where the decision is so unreasonable as to be irrational or perverse. Therefore, they are concerned with the legality of the decision, not its planning merits. A challenge by way of Judicial Review must be made a) promptly and b) in any event not later than six weeks after the grounds to make the claim first arose.

Both of these risks need to be balanced against the risk of not proceeding to determine the application. In this scenario there is also a right of appeal against non-determination for application for which costs can also be awarded.

8.2 Human Rights

Article 8 gives the right to respect for private and family life and First Protocol Article 1 allows for the peaceful enjoyment of possessions. These have to be balanced against the rights and freedoms of others and the orderly development of

the County in the interests of the Community.

First Protocol Article 1 requires that the desires of landowners must be balanced against the impact on residents.

This legislation has been taken into account in arriving at the above recommendation.

8.3 Equalities

The concern of planning law is to regulate the use of land in the interests of the public at large, rather than those of any particular group. Equality will be one of a number of 'relevant considerations' that need to be weighed in Planning Committee members' minds under section 70(2) of the Town and Country Planning Act 1990.

9.0 Financial Implications

There are likely financial implications if the decision and / or imposition of conditions is challenged by a planning appeal or judicial review. The costs of defending any decision will be met by the authority and will vary dependent on the scale and nature of the proposal. Local financial considerations are capable of being taken into account when determining this planning application — insofar as they are material to the application. The weight given to this issue is a matter for the decision maker.

10. Background

Relevant Planning Policies

Central Government Guidance: National Planning Policy Framework National Planning Practice Guidance

Shropshire Core Strategy:

CS5 Countryside and Green Belt

CS6 Sustainable Design and Development Principles

CS13 Economic Development, Enterprise and Employment

CS16 Tourism. Culture and Leisure

CS17 Environmental Networks

CS18 Sustainable Water Management

SAMDev Plan:

MD2 Sustainable Design

MD11 Tourism facilities and visitor accommodation

MD12 The Natural Environment

RELEVANT PLANNING HISTORY:

10/00494/FUL Formation of an agricultural access at Uppermarches, Catherton Common PERMIT 27TH April 2010

14/03958/AGR Erection of steel frame building PRIOR APPROVAL NOT REQUIRED 9TH October 2014

15/04508/FUL Change of use of land to accommodate 4 no. holiday chalets with associated access and parking; installation of package treatment plant REFUSE 22nd January 2016

Additional Information

<u>View details online: https://pa.shropshire.gov.uk/online-applications/simpleSearchResults.do?action=firstPage</u>

List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)

Design and Access Statement

Ecology Report

Holiday Accommodation Market Statement

Cabinet Member (Portfolio Holder)

Cllr M. Price

Local Member

Cllr Gwilym Butler

Cllr Madge Shineton

Appendices Informatives

Informatives

- 1. Despite the Council wanting to work with the applicant in a positive and proactive manner as required in the National planning policy Framework paragraph 187, the proposed development is contrary to the policies set out in the committee report and referred to in the reasons for refusal, and it has not been possible to reach an agreed solution.
- 2. In determining this application the Local Planning Authority gave consideration to the following policies:

Central Government Guidance: National Planning Policy Framework National Planning Practice Guidance

Shropshire Core Strategy:

CS5 Countryside and Green Belt

CS6 Sustainable Design and Development Principles

CS13 Economic Development, Enterprise and Employment

CS16 Tourism, Culture and Leisure

CS17 Environmental Networks

CS18 Sustainable Water Management

SAMDev Plan:

MD2 Sustainable Design MD11 Tourism Facilities and Visitor Accommodation

MD12 Natural Environment

_