

**SOUTH PLANNING COMMITTEE
SCHEDULE OF ADDITIONAL LETTERS**

Date: 18 October 2022

NOTE: This schedule reports only additional letters received before 5pm on the day before committee. Any items received on the day of Committee will be reported verbally to the meeting

Item No.	Application No.	Originator:
5	22/02565/FUL (Brickhouse Farm, Greete)	Applicant

The applicant has provided an addendum note to supplement the Construction Traffic Management Plan accompanying the application. This deals with comments made by third parties during the consultation period. In summary, it is confirmed that:

i. Banksmen will communicate between vehicles / site management via CB radio to ensure traffic is controlled in a 'one way only' fashion and avoid conflict between construction vehicles.

ii. Details of the Community Engagement Officer will be provided within an information leaflet that will be distributed to local stakeholders prior to the commencement of construction, to be delivered within an area to be agreed with Shropshire Council. The contact information will also be included on the site notice board.

iii. Justification of the traffic survey provided within the initial CTMP. The surveys were undertaken during school term times which is standard industry practice. The scope of the Automatic Traffic Count (ATC) surveys was agreed with Shropshire Council highway officers prior to the surveys being undertaken. The agent noted that Work from Home measures were in place at the time of the survey and queried whether a scaling factor should be applied to the data. Highway officers did not consider this to be necessary, noting the site's location and "rural nature of Shropshire". The speed measurements were provided with reference to DMRB CA 185 and professional judgement. The highway authority agreed that February provided a reasonable time period to undertake measurements.

Notwithstanding the above, no issues have been raised the highway authority regarding the survey data submitted within the CTMP. Banksmen are also proposed at the site access to control traffic flow and vehicle speeds, if necessary.

Item No.	Application No.	Originator:
5	22/02565/FUL (Brickhouse Farm, Greete)	CPRE

The enclosed representation from the CPRE was circulated to Members early on 17/10/22:

1. This application appears to have been listed prematurely for re-consideration by the Southern Planning Committee on 18 October 2022, for reasons as set out below.
2. At the Southern Planning Committee meeting on 27 September 2022 the members clearly preferred that BMV land should not be used for solar farms. They resolved to refuse the Ledwyche application (22/02151/FUL) on that basis, although the supporting decision notice was not issued until 13 October.
3. Acting on the same principal Cllr Wild asked the Greete applicant if they "would be prepared to withdraw all the Grade 2 and 3a land from the application" (1:54:17 on the recording at <https://shropshire.gov.uk/committee-services/ieListDocuments.aspx?CId=127&MId=4730&Ver=4>). After this was agreed to in

principle by the applicant, and following further debate about how parcels of different grade land could be farmed, the subsequent proposal made by Cllr Wild (from 2:06:26 on the recording) was: “because we are lucky enough to have the managing director here and he has made the offer about altering the site, the most sensible thing to do would be to defer this application and let the managing director go back and engage with the parish council and the local councillors and come back with something that may be better . . . we haven’t got all the knowledge or all the information”. This proposal was immediately seconded by the Chair, Cllr Evans.

4. However, for some reason this has come through in the minutes as a resolution “That consideration of the application be deferred to allow the applicant to investigate whether it would be possible to remove the Grade 2 agricultural land from the application”.

5. That minute therefore incorrectly makes no mention of the Grade 3a land, nor of the requirement for further consultation. It is therefore not a proper record of the proposal that was actually voted on.

Subsequent action, and lack of consultation

6. The next action surrounding this application that the general public could have seen was the listing of the application to come back before the SPC on 18 October. These Committee Notification Details were not posted up on the planning website for 22/02565/FUL until 10 October. At that stage, there were no further relevant documents on the website - no officer/committee report and no supporting documents from the applicant.

7. The Committee Report for 18 October was in fact posted up on the website the next day, on 11 October. Also posted on the same date was a 2-page document from the applicant, headed “Revised Design to Exclude BMV land – Briefing to Grahame French – 7 October 2022”, described on the website as “Applicant Revised Design Statement”. This was supported only by a brief email exchange with the applicant’s own Agricultural Land Classification consultant, and three revised drawings.

8. It therefore seems that the applicant produced a revised application on 7 October, backed up by little supporting paperwork. Nevertheless, without any evidence of the required engagement with the community, and without any opportunity for a suitable period of public consultation on the revised plans, within three days the application had been listed for return before the SPC, and a revised Committee report had been published.

9. That does not seem to constitute proper consultation on these revised plans. They should have been re-consulted on, and the applicant should have engaged with the community.

The revised plans

10. In order to aid in comparing the various plans that have been submitted, on the next page we show:

i) the applicant’s own Agricultural Land Classification plan and key (as shown in Appendix 2 - Detailed ALC map of the ALC report);

ii) a Google Earth image (dated 23/4/2021) showing field boundaries and cultivation pattern;

iii) the revised Master Site Layout as now presented; and

iv) the original Master Site Layout as previously presented.

11. This makes it relatively easy to see how the stated agricultural land classification correlates with the actual field pattern, and with these revised proposals.

Agricultural Land Classification

12. The applicant’s Agricultural Land Classification (ALC) report of May 2020 states on page 3 under 1.1 Method that “soil was examined with a one metre handheld Dutch Auger at one hundred metre intervals. Additional boring and soil pits were dug to confirm soil boundaries.”

13. Appendix 3, on page 12, indicates where the 48 hand-drilled cores were taken from. Appendix 5, on page 20, shows where the additional five soil pits were dug. We have

reproduced these two graphics below, along with the ALC map that was presumably produced using the information from these.

14. The Appendix 3 graphic could easily be misinterpreted as giving the impression that a large area of the application site of 58.66Ha was sampled by taking the initial 48 samples. In fact, as is standard practice and as is clearly stated, samples were at 100 metre intervals. This means that actually, on average, only just under one sample per hectare was taken (a hectare is 100m x 100m = 10,000 sq m).

15. Our understanding is that the Dutch auger used would have brought out sample cores which were about 7.5 cm in diameter. The total field area from which the cores were extracted therefore amounted to around 2,160 sq cm, or 0.216 sq metres (there are 10,000 sq cm in a

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sq m). Compared with the total site area of 58.66Ha (i.e. 586,600 sq m) the sampling rate for taking the soil core samples was around 1 part in 2.7 million.

16. The ALC report does say that additional boring and soil pits were dug to confirm soil boundaries, but does not say how it was decided where the soil boundaries might be. The evidence is that this additional sampling was done at only the five sites indicated above. However, the sites shown do not seem to match the soil boundaries between the various grades of land, as shown on the map.

17. This all raises the question as to how hard and fast the boundaries actually are between the various grades of land, or whether the Appendix 2 - Detailed ALC map is indicative only.

18. In the revisions now put forward, the applicant is clearly relying on the exact accuracy of the ALC map in proposing the new so-called "Food Opportunity Areas".

19. In view of the possible uncertainty as to exact boundaries between say Grade 3a and Grade 3b land, might it not be prudent if the whole of any field currently shown as containing Grade 2 or 3a land were retained for agricultural production, rather than having solar panels constructed on it?

20. We also note that recent reports indicate that the Government may be intending to amend the definition of BMV land to include Grade 3b land.

Stated outcome

21. The applicant's Briefing to Grahame French states that their revisions have (1) removed 15.6 acres from four parcels of BMV land and that (2) this leaves 6.06 acres of grade 3a land to be taken up by solar panels, representing just under 5% of BMV land.

22. It is difficult to see how these figures tie in with the Table 2 Summary of Agricultural Land Classification Grades as shown at the top of page 9 of the ALC report. We reproduce an adapted version of this table below. This adaptation includes acreages and a subtotal for BMV land, which were not shown in the original table.

Table 2 Summary of ALC Grades (as adapted)

Grade/Subgrade	Approximate Area in Ha	Approximate Area in acres	Area %
2	1.62	4.00	2.8
3a	10.63	26.27	18.1
BMV sub-total	12.25	30.27	20.9
3b	44.51	109.98	75.9
4	0.70	1.73	1.2
Non-agricultural	1.20	2.97	2.0
Total	58.66	144.95	100.0

23. This appears to show that there were 30.27 acres of BMV land in the original proposal, representing 20.9% of the whole site. The removal of 15.4 acres (or 6.23 Ha)

would therefore appear to leave about 15 acres of BMV land, or around 10% of the whole site, not the 6.06 acres claimed. From this it appears that around 50% of the BMV land would still be within the solar farm, rather than the 5% claimed.

Electricity production

24. The applicant states that the revisions would reduce the capacity of the solar farm by 5MW which would have provided enough electricity to power the equivalent of 1,500 homes.

25. We have set out below a table summarising figures that have appeared in recent Committee Reports. This indicates the large discrepancies between the various claims for the number of homes (equivalent) that solar farms can supply. The statement by the applicant that the 5MW lost by the revised proposals is equivalent to the electricity demands of 1,500 homes is at a rate which is around 50% higher than their previous statement, and around 300% higher than the rate claimed by the Ledwyche applicant.

	SPC 27/9/22		NPC 11/10/22	SPC 18/10/22
	22/02151/FUL Ledwyche	22/02565/FUL Greete	22/03477/FUL Rhydycroesau	Removed from Greete
Officer reports				
Capacity in MW	12.00	49.99	1.24	5.00
Number of homes equivalent	1,250	10,400	322	1,500
Homes per MW	104	208	260	300

26. As noted in our earlier submission dated 18 September 2022, domestic electricity consumption was only around 36% of total UK electricity consumption in 2021, so the “homes equivalent” figure should be multiplied by 36% to give a truer reflection of the actual number of homes likely to be supplied.

27. We again make a plea that officers do not accept these claims of “homes equivalent” at face value in their reports, but apply some critical analysis to them.

Viability

28. The applicant’s Briefing to Grahame French states that, in redesigning the proposal, they have had to be mindful of “the overall economic viability of the proposal”. It would have been helpful to have had some indication of viability figures involved, as is required in some other circumstances by the NPPF.

29. Firstly, we note that the Ledwyche application, as shown above at 12MW, was presumably considered to have been economically viable (not to mention the Rhydycroesau application at only 1.24MW).

30. Secondly, as recorded in our earlier submission dated 26 September 2022, the applicant helpfully drew attention to the Bluefield Solar Income Fund which it said would eventually own this solar farm. The last annual information for that entity (which is registered in Guernsey) showed that it owned 106 solar farms with a total installed capacity of 613MWp. That is an average of only 5.78MW per solar farm.

31. If solar farms of that size, and of the size of the Ledwyche application, are considered to be economically viable, it therefore seems unlikely that removing even all the fields containing BMV land from this application would render it economically unviable.

Research and Development

32. Harper Adams University, one of Shropshire’s star assets, has been at the forefront of agricultural research and innovation for decades and the offer by the applicant of sponsoring a student to carry out the sort of research envisaged on Agrivoltaics is to be welcomed.

33. It is however disappointing to note that clearly little is currently known about mixing solar farms with food production.

34. We do note, however, that the whole site contributes to food security at the moment by being a “Food Opportunity Area”, otherwise more generally known as agricultural fields.

Conclusions

35. Taking into account the above considerations we conclude that:

- a) The applicant appears not to have engaged with the community/local councillors as requested by the committee on 27 September;
- b) There has been no proper opportunity for consultation by the general public on these revised plans - in fact the application was listed to go to committee before any documents appeared on the planning website on which anyone could possibly comment;
- c) The minutes of the SPC meeting on 27 September are inadequate;
- d) In view of grey areas around the precise boundaries between, particularly, grade 3a and Grade 3b land, it might be prudent if the whole of any field currently shown as containing Grade 2 or 3a land were retained for agricultural production, rather than having solar panels constructed on it;
- e) It is possible that the definition of BMV land will be changed to include Grade 3b land;
- f) The applicant’s revised figures appear to leave around 50% of the BMV land within the solar farm, rather than the 5% claimed;
- g) Committee reports should apply some critical analysis in assessing and reporting claims of “homes equivalent” figures for electricity production;
- h) It seems unlikely that removing even all the fields containing BMV land from this application would render it economically unviable;
- i) There still remains a lack of information on which to make a fully informed decision.

36. Our overall conclusion, therefore, is that this revised application has been brought before the Southern Planning Committee prematurely and that any decision on this revised application should again be deferred until the above considerations are satisfactorily addressed.

Item No.	Application No.	Originator:
5	22/02565/FUL (Brickhouse Farm, Greete)	Case Officer

Officer response to CPRE late representation

The CPRE considers that the decision at the 27th September committee implied a commitment for further formal community consultations before the application was reported back to committee. The officer has reviewed the committee resolution and can find no clear commitment for this. The resolution voted on was to defer the application to give the applicant time to consider options to remove B&MV land within the site. The decision on whether to re-consult on a planning application is one of planning judgment, based on the nature and context of any amendments. The amendments in this case respond to the instruction of the committee and are designed to mitigate effects on B&MV land by removing areas of such land from beneath the solar arrays. This is not deemed to meet the requirements for formal re-consultation (given also the need to ensure a timely decision for the applicant). Notwithstanding this, relevant details were placed on the Council’s planning portal upon receipt and the Council has accepted the late representation from the CPRE.

Reference to Grade 2 land in the decision from the 27th September committee is a mistake and the intent was clearly to refer to all Best and Most Versatile land. The applicant responded on this basis as is clear from their response statement of 7th October 22 which is displayed online.

CPRE has challenged the way in which B&MV boundaries have been defined and the comprehensiveness of the survey methodology. They conclude, based on a comparison of before and after acreages provided by the applicant that 50% of the B&MV land within

the site would remain under solar arrays in the amended scheme in contrast with the 5% figure stated by the applicant's specialist agricultural consultant. This CPRE assessment does not appear to be informed by input from a specialist agricultural consultant. Given the very late representation from the CPRE the applicant has not had the opportunity to respond at this time. Any response will therefore need to be reported verbally.

The CPRE advises that the energy output from the proposals is greater than that claimed per area from the Ledwyche proposals which were refused at the last committee. The officer is aware that different types of solar panel can have different levels of efficiency and the Greete applicant has committed to use the most efficient panels.

The CPRE notes that it is disappointing that little is known currently about mixing solar farms with food production (agrivoltaics) but they advise that the whole of the site currently contributes to food security. The officer considers that the proposed academic link with Harper Adams College is a positive initiative and study of the relatively small area of B&MV land within the solar site has the potential to inform best practice for management of much greater areas of B&MV land within solar farms both at a countywide and a national level.

Item No.	Application No.	Originator:
5	22/02565/FUL (Brickhouse Farm, Greete)	Greete Parish Meeting

Sent by the Greete Parish Meeting on behalf of Alison Morgan, widow of the tenant farmer of Brick House Solar Farm

To whom it may concern

With regards to the planning application 22/02565/FUL for Brick House, Greete Solar Farm I would like to give an overview of the farm. My Father in Law came to Brick House Farm as a young man with his wife and family in 1944 and the farm is still farmed by his son to the present day.

Brick House Farm has been farmed over the years in a manner that has supported and improved the farm. It ran a Dairy Herd which at its peak ran upwards of 100 milking cows. All calves were reared and kept either as Dairy Herd replacements or reared and then sold for Beef. Crops of Wheat, Barley and Oats were grown (never potatoes), with the majority of the barley and oats being retained and fed to the livestock. All cattle were grazed on grass during the summer and housed in large straw sheds during the winter. Straw from the crops was used as bedding and this was later returned to the land as Farm Yard Muck. A vital part of maintaining and improving the soil structure and health. Any ground not in cultivation for cereals was grass for grazing. Sheep were also brought down from the Welsh Mountains for winter grazing. This clearly indicates that Brick House Farm has been highly productive for many, many decades.

Brick House Farm is a wonderful varied environment for wildlife with old hedges and trees. It has supported 3 families over two generations and 6 adults and 8 children have grown up in the village.

Renewable Energy is important for this country but growing food is vital. Brick House Farm is a viable, productive, healthy farm in a beautiful part of Shropshire.

Please do not allow it to be turned into an industrialised Mono Culture of Solar Panels and degrading grass (due to lack of light under the panels and close mowing of access areas). I strongly urge that you do not enable Brick House Farm to no longer be agriculturally productive.

Item No.	Application No.	Originator:
5	22/02565/FUL (Brickhouse Farm, Greete)	Greete Parish Meeting planning consultant
<p>AddisonRees Planning Consultancy have been instructed by the Greete Parish Meeting (GPM) to make further representations on the proposed solar development at Brick House Farm in Greete, following the deferral of the application by the Southern Planning Committee held on 27th September 2022.</p> <p>The concerns raised in the initial representation made on behalf of GPM largely remain, however this response highlights the three main concerns that the GPM have in respect of the amended scheme and the officer assessment of this revised proposal.</p> <p>Firstly, the published minutes of the Southern Planning Committee meeting of 27th September state that:</p> <p>RESOLVED: That consideration of the application be deferred to allow the applicant to investigate whether it would be possible to remove the Grade 2 agricultural land from the application.</p> <p>We believe this to be incorrect. It is understood that the committee resolution sought to investigate removing all BMV land, which would be land classified as grade 2 and 3a from the application proposals. To seek removal of only grade 2 land is nonsensical; there is no point in the applicant removing only grade 2 and leaving grade 3a land within the proposals as this does not achieve the committee's requirement of not building on BMV land.</p> <p>Like the solar farm application in Ledwyche (ref 22/02151/FUL), which was turned down on grounds of loss of BMV land (which was grade 3a land), both applications should be treated the same and there should be consistency in the authority's decision making. Therefore, the GPM would be grateful for this to be amended and so this is correctly recorded in the published minutes as an accurate and true public record of the committee's resolution on 27th September.</p> <p>Matters to be considered at the planning committee meeting on 18th October</p> <p>1. Best and Most Versatile Agricultural Land</p> <p>The Agricultural Land Classification Report submitted for the application identifies that part of the site falls within Grade 2 and Grade 3a land; with the remainder for the site being identified as Grade 3b.</p> <p>It is acknowledged and appreciated that the applicant has sought to engage GPM, and that the scheme has been amended to remove some 6ha of BMV land; which is 95% of the BMV land on the whole site. However, GPMs main concerns are not necessarily about the amendment to the application but the interpretation of advice and statements that have been made and the principle of the loss of BMV and the identified productivity of this site as a whole, which would be lost as a consequence of this proposal.</p> <p>Members of the GPM have considered whether to commission their own independent soil analysis, however the cost of this alone means it is prohibitive. It is recognized that the purpose of land classification is primarily to assist planning authorities in their decision-making, and it is acknowledged that land grading is not precise in practice. As such, a more worthwhile approach taken by GPM to gain an understanding of the productivity of this land, has been to identify reliable sources to advise about the historic yields of the site. To that end, local people involved in farming have been canvassed for their recollections about the productivity of the land.</p> <p>As a summary, the following information has been collated:</p> <ul style="list-style-type: none"> - Alison Morgan - Her father-in-law and then her husband and brother-in-law have been tenants of Brick House Farm since 1944, and confirms that Brick House Farm has been highly productive for many, many decades. The site has been farmed for the last 70+ 		

years and is very productive, producing very good yields of grain (producing 4 tonnes per acre of wheat) and grass for milk and beef cattle. It has been constantly manured with farmyard manure resulting in very good consistent fertility.

- Tenbury Agricultural Association speak of a farm with high yields which some describe as varying between 3.5 to 4.5 tonnes per acre.

- Councillor for the ward that includes Greete, Cllr. Richard Huffer, who is also a farmer. At the Southern Planning Committee meeting on 27 September he said he was aware that the land had supported a dairy herd of more than 100 animals and was capable of producing cereals at 4 tonnes per acre.

Local knowledge asserts that the land has been capable 4 tonnes per acre. Similarly, under the Ledwych case it was advised that the land was capable of providing 10 tonnes per ha (4 tonnes per acre).

GPM also strongly challenge the advice given that farmers practice to farm to the lower land classification. Advice sought from John Pelham of Anderson Farm Business Consultants explained that:

Over the years field amalgamations created much more variation in soil quality so a mixture of soil classes in a field is much more common. Farmers use technology to seek to bring all of the parcel up to the productive standard of the highest class.

It's worthwhile considering another aspect of land classification. Grading is not precise; Grading is not something farmers use when they are managing their land. A farmer will know from experience how to cultivate a parcel of land for maximum yield. The class of the soil isn't necessarily an indication of its potential. For example, class 2 land tends to have less clay than class 3. This means the class 3 land may be better suited to the production of cereal crops whereas class 2 may be better for root crops. In some circumstances class 3 land may in fact produce a greater tonnage of a cereal crop than might the class 2 land.

It is considered that the proposed Food Opportunity Areas (FOA) help in removing BMV land from the built parts of the proposal – however it remains to be seen how functional and productive these areas will be. It is difficult to see how manageable these small areas will be within the site, that will be surrounded by solar panels and paraphernalia, and also whether there is any interest from any farmers who would wish to work these potentially difficult 'pocket' sites. Whilst it is to be applauded that the applicant has sought initiative seeking involvement and to monitor and report on the productivity and success of the FOAs on the site, by involving research opportunities with Harper Adams College, and they have proactively sought and engaged GPM in addressing the committee's issues, it is a concern that these areas are token. As shown by the wording of the suggested condition as part of the amended officer recommendation, this allows scope for the applicant to change these areas at a later date with the agreement of the LPA. It does not specify under what circumstances the LPA would be able to resist any such requests to change the FOAs.

The NPPF states at paragraph 174 that planning policies and decisions should contribute to and enhance the natural and local environment by, inter alia, "recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland." Further, Core Strategy Policy CS6 describes that new development should make effective use of land and safeguard natural resources, including high quality agricultural land.

Government guidance acknowledges that solar is a highly flexible technology and as such can be deployed on a wide variety of land types. Where possible, ground mounted Solar PV projects should utilise previously developed land, brownfield land, contaminated land, industrial land, or agricultural land of classification 3b, 4, and 5 (avoiding the use of "Best and Most Versatile" cropland).

It remains that the proposal will fail to safeguard some of the best and most versatile agricultural land. Therefore, this adverse impact counts against the development.

2. Traffic generation and the nature of vehicle movements

The suitability and condition of the highway network and access roads to the application site and impacts on highway safety remain a primary concern for GPM.

There are still a number of inaccuracies and matters that are significantly downplayed in the applicant's highways submissions that have failed to be understood from a local perspective. In this regard, the GPM's key concerns have already been summarised in their initial representation made by Addison Rees Planning Consultancy Ltd.

Fundamentally, it remains, that the accuracy and selection of data may well have significantly altered any associated highways impacts as a result of this proposal.

The development is considered to pose an unacceptable impact on highway safety, and the proposed traffic management measures are impractical given the real-life conditions and use of the local road network.

Finally, the impact of the amended proposal to now include the FOAs and any associated changes to traffic movements and conflicts, such as agricultural machinery on the site as well as any construction vehicles, has not been considered at all in the amended officer assessment (para 6.1) – there is no mention of this whatsoever or whether there would be any highways impacts by this proposed change, and whether such impacts would be acceptable. Again, this demonstrates to GPM that the traffic impacts have not been thoroughly assessed and considered, especially in terms of reality of the impacts during the construction and decommission phases of this project and which remains a fundamental concern for GPM.

3. High Pressure Pipeline – statutory consultation

Clarification is sought as to whether the Council have carried out their statutory duty to consult with the HSE in respect of the high-pressure pipeline that crosses the application site. Statutory consultees are those organisations and bodies, defined by statute, which local planning authorities are legally required to consult before reaching a decision on relevant planning applications.

It is the GPM view that the HSE are a statutory consultee, as required under Schedule 4(e) and (in relation to applications for planning permission made on or after 1 August 2020) Development Management Procedure Order 2015 (Stat. Instrument No. 595) as there will be a "material increase in the number of persons working within of visiting the notified area".

From studying the council's online case file and the officer report there is no indication that this consultation has been carried out. In fact, there is no mention or consideration of this matter whatsoever.

Whilst primarily governed under separate legislation, the HSE is still a statutory consultee for such development proposals and failure to carry out any statutory consultation could render any decision made illegal and thus challengeable. It is also a material consideration that has not been taken into account in the consideration of this proposal.

Conclusion:

There are concerns about the accuracy of some information and data that has been presented as part of the application, and some of the assumptions that have subsequently been reached by those assessing the proposals.

It remains that the development would result in the loss of best and most versatile agricultural land, and there would be harmful adverse impacts on highway safety.

Yours sincerely,
Simon Rees BSc, MA, MRTPI (Director)
AddisonRees Planning Consultancy Ltd

Item No.	Application No.	Originator:
7	22/04011/OUT	David Jones

The Council's Landscape Consultant has responded to the application indicating

Although the application is accompanied by a document titled Landscape and Visual Impact Assessment, it is not prepared in accordance with the best practice set out in GLVIA3 and does not set out a structured and evidence based assessment of landscape and visual effects. A narrative is provided on likely effects, however, no structured assessment is made on the effects on landscape character, landscape elements, or visual effects. Although some photographic images have been included, their locations are imprecise, offer an unrepresentative sample of potential viewpoints, and the use of Google Maps photographic images is inappropriate and questions the extent of fieldwork undertaken in the assessment of effects.

There are open views into the site from the minor road from which access is proposed to be made, and it is likely that these views would increase as a result of vegetation removal for visibility purposes. The visibility of the site from other publicly accessible locations, including the rights of way network, has not been established in the LVIA. There will be a notable effect on the topography of the site as a result of the development, and along with other landscape receptors, this has not been considered for assessment. The AONB boundary is some 3.6km from the proposal site at its nearest point and is unlikely to experience adverse effects due to the small scale of the proposed development, distance and intervening topography and vegetation. Given the absence of information on predicted landscape and visual effects arising from the development, and the likely adverse effects on landscape character, landscape elements and visual amenity, we do not consider that the proposals comply with the Councils local plan policies on landscape and visual amenity

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7	22/04011/OUT	David Jones
<p>Email received from agent with details of visibility splays and other work's to the access. Highways and SC trees have been consulted.</p> <p>Officer note. Detail not considered sufficient.</p>		
Item No.	Application No.	Originator:
7	22/04011/OUT	David Jones
<p>1 Additional comment of support on the grounds that this small scale development will provide for local need for the benefit of the community.</p>		
Item No.	Application No.	Originator:
10	22/03728/FUL	Sara Jones
<p>Consultee Comment SC Ecology Team (12.10.2022) – content with the level of survey work and recommend conditions and informatives with respect to landscaping, provision of bat/ bird boxes, external lighting and general wildlife protection.</p>		
Item No.	Application No.	Originator:
7	22/04011/out	Applicant
<p>Letter received from the agent 13.10.22:</p> <ul style="list-style-type: none"> - Applicant is happy to comply with conditions recommended by consultees. - There is considerable support for the proposal (15 representations). - Merits and balance of the case officer assessments are disputed. 		

- Suggested that the assessment is difficult to reconcile with more recent approvals under reference numbers 19/04194/OUT and 22/01314/FUL.
- Contended that the development will be difficult to see from the public highway.
- Advice of the council's Landscape Consultant is disputed.
- Affordable housing is not need and considerations are not given sufficient weight in the planning balance.
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Item No.	Application No.	Originator:

Item No.	Application No.	Originator:
7	22/04011/OUT	Applicant

Response received from the applicant's landscape consultant which responds to the consultation response of the council's Landscape Consultant as follows:

- The error in the LVIA about the site entrance strengthens the conclusion made that the effects of the development will not have a significant effect on the landscape as a resource or on people who will be affected by changes in views or visual amenity at different places.
- The LVIA identifies landscape receptors, including the constituent elements of the landscape, its specific aesthetic or perceptual qualities and the character of the landscape; and visual receptors, that is, the people who will be affected by changes in views or visual amenity at different places. I have identified the effects in a combined or holistic approach by establishing and describing the changes resulting from the different components of the development and the resulting effects on individual landscape or visual receptors. This is similar in approach to that advocated by the LI Guidelines (LI, 3.20, 3.21, pages 35-36). The sensitivity of the receptors in this case is low. The development will sit in a landscape which has a historical tradition of scattered homesteads and farms and this development will continue that small scale tradition and be sheltered by the landscape of undulating hills, hedgerows, woodlands and limited viewpoints. The size of the effects is negligible for similar reasons – it is a small scale development in keeping with the landscape which will not intrude on those around it. Overall the significance is minimal. The Comment Author is therefore wrong to conclude that the development does not “comply with the Council's local plan policies on landscape and visual amenity.”
- The reasoning of the LVIA is clear with “ more emphasis on narrative text describing the landscape and visual effects and the judgements made about their significance” (LI, summary of good practice, page 47). The LVIA has taken into account a range of factors in identifying the value of the landscape (including landscape quality, scenic quality, conservation interests and perceptual aspects).The Guidelines state that key points to consider include that there “cannot be a standard approach as circumstances will vary from place to place.” (LI, 5.29) The approach I have adopted has resulted in an LVIA which is “concise and to the point” (LI, 8.9) and reflects the nature of this development which is small scale in its effects on landscape and visual amenity and which has minimal significance for both.

Item No.	Application No.	Originator:

Item No.	Application No.	Originator:
9	22/03529/FUL (Stretton Westwood)	Agent
<p>The proposal has been supported by the Much Wenlock Town Council and in Paragraphs 6.15 and 6.16 the Officers accept that the proposal is in accordance with the Much Wenlock Neighbourhood Plan.</p>		
<p>The proposal will further support the existing holiday let business which has previously received approval and is operating very successfully and has demonstrated to the applicant the requirement for further accommodation but in the case of the application now before you of a permanent and very high-quality accommodation for larger families or groups of friends. Such accommodation is scarce throughout, not only the local area but Shropshire as a whole.</p>		
<p>It is clear from the Officers report and recommendation that the design, size, renewable energy, drainage arrangements and landscaping that the proposal will be beneficial to the visitor economy but the fundamental objection is to the permanence of the accommodation. Such permanent structures do not fall to be read against Council policy regarding countryside which requires the accommodation for visitors to conform to the legal definition of a caravan.</p>		
<p>The Core Strategy and SAMDev policies were adopted prior to the impact of Covid and the massive changes that have resulted due to travel restrictions, individuals concerns over travelling as they did previously with a resultant demand for additional accommodation in the UK.</p>		
<p>The restriction to new units of accommodation, having to be of caravan or other form of non-permanent unit provides challenges to large families/groups who want to be together in high quality accommodation that suits people of all needs, including elderly or disabled who may not enjoy the restricted size of current available holiday provision.</p>		
<p>Having regard to the Covid impact the policies have not been reviewed and updated to allow for more permanent and potentially larger, higher specification purpose-built units as there remains an underlying concern as to what would happen to such units if they are no longer required for tourist occupation.</p>		
<p>This can be controlled by condition and/or a S106 agreement to which the applicant has agreed to the imposition, a draft has been submitted to the LPA and we note from the Officer's report that SC's legal department has some queries as to the drafting, these can be resolved should the committee resolve to approve, subject to conditions and the agreement and completion of the S106.</p>		
<p>In paragraph 6.5.4 of the Officer report, it states that the applicant puts significant weight on Paragraph 80 of the NPPF and we are perfectly aware that this relates to new open market dwellings in the open countryside. We are not aware of where any significant weight has been put on this policy, however it does say that any dwelling would be expected to be of exceptional high design. Therefore, it would seem logical that such a requirement for high quality design would also apply to any permanent holiday let if the Council had such a policy for new build holiday/tourist accommodation. The submitted plans and accompanying Design and Access Statement demonstrate the high standard of the buildings.</p>		

Paragraph 84 of the NPPF advocates supporting a prosperous rural economy and states that both policies and decisions should enable: The sustainable growth and expansion of all types of business in rural area both through the conversion of existing buildings and well-designed new buildings; Sustainable rural tourism and leisure developments which respect the character of the countryside.

Finally on the previous refused application this is now the subject of a valid appeal (formal start letter is awaited from PINs) reference APP/L3245/W/22/3301595, the second reason for refusal contained within this appeal has been addressed in this current application, the appeal also includes the provision a of a suitable S106 agreement, should the Inspector consider that this is required.

Item No.	Application No.	Originator:
10	22/03728/FUL (Dwelling north of Glazeley)	Agent

Clarifications by agent:

1. As acknowledged the application is made under the Council's single-plot exception site policy. However, it clearly makes sense for Jack to be within sight and sound of his livestock as part of his agricultural enterprise. It is hoped that this will be given some weight by the members when they consider the application.

2. I have spoken to Mr & Mrs Groves regarding the legal right of access along the track and they have assured me that this exists. I am not sure it can be evidenced at such short notice. There have been similar sites with this same issue and I have not been asked to produce evidence in other cases. This is a legal detail that will be picked up during the 106 process, in the event of the application being successful.

3. I can see no useful purpose in including the surrounding land within a blue line. If the application is successful the land edged red will be transferred to Jack. At that point Jack will have no legal interest in the adjacent/adjoining land. It would therefore be inappropriate to impose conditions relating to adjacent/adjoining land beyond the red line. That being said, I understand that this has arisen as a result of comments made by the Council's Tree Officer. I can confirm there are no trees of any significance on or adjacent to the site and this you will be able to see for yourself when you visit the site on Tuesday morning.

4. The bin collection lorry collects refuse from all the properties along the private drive travelling up to Woodlands Hall, past this site. As such it is envisaged that there will be a kerb-side collection for this site (if approved) along the track, the same arrangement as exists currently for all the other properties at The Uplands.

5. Mr Alan Groves, Jack's father, will be at site on Tuesday morning. He will ensure the sheep are not in the field and that the field gate is open.

Further representation by agent:

This application is for an affordable dwelling within a small settlement known locally as the Uplands. In this instance there are five houses all grouped. Whilst the number is small they are all occupied by different families and they are grouped together. See map below:



The properties are:

- The Uplands;
- The Uplands Barn;
- Inglewood;
- Woodlands Cottage; and
- The Uplands Cottage.

The policy advises that sites which constitute isolated or sporadic development, and those which would adversely affect the landscape, local historic or rural character of an area should be resisted. This site is clearly not isolated, nor is it prominently located. The property has been designed to be single story to further minimise any impact within this rural setting.

The Ward Councillor was consulted as part of the pre-application discussions and expressed the opinion that the Uplands is a recognised settlement, widely known locally, and that the proposed site put forward is considered to be adjoining the settlement of the Uplands.

The application is also fully supported by the Parish Council.

- Uplands Cottage
- Woodlands Cottage
- Inglewood
- The Uplands
- The Uplands Barn
- The site
- Modern barn for sheep
- 1 & 2 Long Bank Cottages

Item No.	Application No.	Originator:
10	22/03728/FUL (Dwelling north of Glazeley)	Chelmarsh Parish Council

Councillors are disappointed to note that this application is recommended for refusal.

Councillors supported this application for a local lad having lived in the area all his life and wanting to build on land available for an 'affordable home'. He has met all the criteria for this, and Cllrs are disappointed to note that this is down for 'refusal'. The proposed property is of a very sympathetic, low impact dwelling.

Jack Groves work is at this location and his parents live close by in this small hamlet. Help might be required by his parents in future years, and we therefore request that this application is seriously looked into.

Cllrs are sure that you are aware that there are no affordable properties in the Parish, and this is the only option available to our young residents.

We regret that we do not have anyone available to attend the meeting but hope that these comments will be taken in consideration and the application is approved.