

Cyngor Tref Llanandras a Norton
PRESTEIGNE AND NORTON TOWN COUNCIL

Clerk: Mrs Tracey Price, Garn Farm, Chapel Lawn, Bucknell, Shropshire. SY7 0BT
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23rd April 2015

Planning Inspectorate

Dear Sirs,

Planning Appeal APP/T6850/A/2213106
Upper Heath Farm, Presteigne

The Town Council wishes to make the following comments on the above appeal.

Manure Management

The Town Council has raised a number of concerns about manure management. The Applicant has submitted three versions of his Manure Management Plan and the Town Council is aware that there remain outstanding matters in the plan about which Natural Resources Wales are concerned. Natural Resources Wales have at the time of writing still not granted their licence despite many months of consideration. However they state that they do expect to in due course. The Town Council note that the Manure Management Plan will be made a condition if permission is granted. Notwithstanding the effectiveness and rigour with which the agreed manure management plan may be implemented the Town Council is still extremely concerned that because of the cumulative effect of an operation on this large scale, there will inevitably be detrimental impacts on the local ecology, and public amenity during operation on site and transport to and from the site.

Impact on Water Quality.

The Town Council has expressed concern as to the impact on the water quality in the Hindwell Brook, which is adjacent to the site, and the River Lugg into which the Hindwell Brook flows within 2km of the site. The Town Council notes that Natural Resources Wales has received a Flood Consequences Assessment which meets minimum requirements of TAN 15. However Natural Resources Wales are clearly not satisfied with this level of flood risk control because they ask that the site be elevated further. Unfortunately elevation will add to the detrimental visual impact of the development, so it seems likely that the site, if developed, will be

constructed at a level with which Natural Resources Wales are not completely happy.

In addition to the risk of water pollution from the site itself the Town Council has expressed concern that there will be impact on water quality from the spreading of the manure on the applicant's site and other sites from run off. The Town Council accepts that in ideal conditions the Manure Management Plan will deal with disposal according to the Control of Pollution Regulations 2008. However the Town Council believes that ideal conditions are almost impossible to achieve and maintain on a regular basis and the regulations will therefore be hard to adhere to.

Thus in respect of both site operation and manure spreading the Town Council remains extremely concerned that despite the best efforts of the applicant this operation if it is allowed to proceed will result in water pollution in the future. The statutory consultee The Radnorshire Wildlife Trust concurs with this view.

Visual Impact and Airborne Pollution.

The Town Council has expressed concern that there will be considerable detrimental and unacceptable impact on the Landscape and the nearby Listed Buildings, both from a visual and a pollution point of view. The Town Council accepts that the applicant has attempted to address these issues with technical solutions such as visual screening, extract filters, noise attenuators, etc. He has submitted reports that demonstrate that in all respects the impacts fall within, or just within prescribed guidelines under ideal conditions. However, ideal conditions are almost impossible to achieve and maintain on a continuous basis and the Town Council is concerned that in reality levels could easily exceed the prescribed guidelines due to weather conditions, management problems, etc.

Local Opposition

Planning Policy Wales advises in paragraph 3.1.8, that perceived fears of the public can amount to a good reason to refuse an application. The planning officer in her report states that the evidence submitted in her report addresses the fears of the members of the public who have submitted objections, and that therefore this reason for refusal can be ignored. The Town Council does not agree with the officer's perspective because they believe few of the fears of the public have been adequately addressed in the application. The Town Council feels that throughout the application and associated reports there is an endemic lack of a sufficient safety factor, and thus the fears of the public are very real indeed and should be taken into account.

Built Heritage.

The Town Council is extremely concerned at the detrimental impact of this application on the nearby Listed Buildings and Ancient Monuments. The Built Heritage Officer has stated that the wider setting of the two nearby listed buildings, the Cat and Fiddle and Broadheath House with its listed garden, is already of a rural landscape with dispersed farms and buildings, and that therefore the additional farm buildings will make little difference. But this view takes no account of the enormous scale of these additional buildings which transform an average vernacular farm into a large scale

industrial operation. The Town Council cannot accept that these additional buildings do not impact on the wider setting of the area, and thus this application because of its scale contravenes the planning policies specifically intended to protect the environment and setting of the nearby listed buildings. This view is supported by the Welsh Historic Gardens Trust and the Georgian Group.

Presteigne and Norton Town Council believes that the requirements of planning and pollution regulations have barely been achieved in this application allowing little room for human error, unusual circumstance, or extremities of weather. Bearing these factors in mind the Town Council urges the Planning Inspector to take full account of the particularly sensitive nature of this site right beside a watercourse, in an important historic landscape and adjacent to several listed buildings when determining this appeal.

Regards,

Tracey Price
Town Clerk