

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

| | |
|------------------------|------------------|
| Name and Organisation: | Dr Alison Caffyn |
|------------------------|------------------|

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

| | | | | | | | |
|------------|--|---------|-----------------------------------|-------|----------------------|---------------|----------------------|
| Paragraph: | <input type="text" value="2 & 3"/> | Policy: | <input type="text" value="DP18"/> | Site: | <input type="text"/> | Policies Map: | <input type="text"/> |
|------------|--|---------|-----------------------------------|-------|----------------------|---------------|----------------------|

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

There are just two short paragraphs addressing air quality impacts from proposed development which recommend proportionate assessment should be undertaken. However this policy does not differentiate between the range of potential air quality concerns and impacts that developments may give rise to. I have been researching intensive poultry units and major air pollution concerns include odour, ammonia, particulate matter, diesel emissions from HGVs, or other noxious air borne emissions generated by such agricultural processes as described in the government Clean Air Strategy or EA air pollution publications. Concerns here include the impacts on biodiversity and also effects on people's health and amenity in the vicinity. The document treats air pollution as if it was a singular phenomenon, whereas in fact it is more complex than noise pollution or light pollution both of which are given more space in this section of the plan.

There is also no reference (unlike in paragraphs 7 & 8 on noise) to guidance documents such as the Council's own ammonia emissions guidance or industry guidance on the assessment of odour for planning published by the Institute of Air Quality Management in 2018. A proposed development such as an IPU may require several different air quality assessments. They also

need to take into account cumulative effects of existing operations, including any just over county boundaries. Paragraph 2.27 of the HRA document states intensive livestock units may pollute sites up to 10km away. Paragraph 2.28 implies the council does not know where all these facilities currently are, which seems very worrying and would also imply that cumulative impacts could not be assessed effectively. I am aware of a number of planning applications where cumulative impacts of other IPUs very close by have been ignored/omitted and this wording does not give confidence that this will be addressed in future.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Council officers expert in air quality issues, should review the wording and add more detail to cover the issues identified, to the same level of detail as other pollution effects.

In particular odour should be identified separately.

The fact that air quality raises concerns about environmental, health and amenity impacts should be noted.

'Cumulative' should either be spelt out more specifically or a cross reference included to where cumulative impacts are defined elsewhere in the plan.

(Please continue on a separate sheet if necessary)

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After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

| | |
|-----------------|-------------------|
| Office Use Only | Part A Reference: |
| | Part B Reference: |

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(Please continue on a separate sheet if necessary)

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature:

| |
|---------------|
| Alison Caffyn |
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Date:

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| 23/02/2021 |
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| Office Use Only | Part A Reference: |
| | Part B Reference: |

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Q2. To which part of the document does this representation relate?

| | | | | | | | |
|------------|---------|---------|--|-------|--|---------------|--|
| Paragraph: | Table 1 | Policy: | | Site: | | Policies Map: | |
|------------|---------|---------|--|-------|--|---------------|--|

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:
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| <p>Table 1 pages 10-11 of the HRA Assessment omits significant impact pathways for air pollution and hydrological impacts.</p> <p>Nitrogen oxide, sulphur oxide and particulate matter are mentioned as being caused by residential and industrial combustion processes. This omits the fact that many intensive livestock units are significant sources of nitrogen oxides and particulate matter. There does not need to be a combustion process involved for there to be pollution from such chemicals and matter.</p> <p>The following point in the table does mention ILUs in connection with ammonia and thus gives the impression that this is the only source of air pollution of concern from such units.</p> <p>Under hydrological impacts there is no reference to agricultural pollution and no reference to surface water pollution from agriculture. The latest apportionment of phosphate sources could I am sure be checked (in the river wye catchment EA estimates it is 66% from agriculture) which should justify being more specific about the risks from inappropriate and excess</p> |
|---|

manure spreading and disposal of manure from the increasing numbers of intensive livestock units being given planning permission. There are currently over 16 million chickens in Shropshire at any one time, plus 6 million collectively in the Severn and Teme catchments in Powys, and 600,000 in the Herefordshire Teme catchment, plus other types of livestock. Inadequate oversight of how the additional volumes of manure is being used creates a huge risk for eutrophication of the county's waterways and loss of biodiversity. This is a planning issue as there are more applications ongoing and manure impacts have been found to be planning matters in a recent legal case about the Tasley application.

The omissions are particularly surprising when seen alongside the long list of recreational and disturbance risks which I would have thought would largely be much less extensive and serious.

(Please continue on a separate sheet if necessary)

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Additional analysis and wording about air pollution and hydrological impacts from agricultural sources to clarify the pathways missing from the table and then in further detail in the text below.

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| Alison Caffyn |
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