

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:	Click or tap here to enter text.
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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="4"/>	Policy:	<input type="text" value="DP19"/>	Site:	<input type="text" value="STC002/P58a"/>	Policies Map:	<input type="text" value="3"/>
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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.

Pollution and Public Amenity:

DP 19 of the Pre-Submission Draft states:

“4. Development should avoid Shropshire’s best and most versatile agricultural land (grades 1, 2 and 3a) wherever possible.”

The areas indicated for proposed employment development at Stanmore have not had detailed Agricultural Land Classification (ALC) surveys so no definitive information is available on the presence of “Best and Most Versatile Land” as required for planning decisions.

The only published ALC map for the area is the Regional ALC map, available from Natural England, which shows the sites as ALC grades 2 or 3. This map is an indicative small scale map (1:250,000 scale), not suitable for identifying grading at site level and it does not distinguish between grades 3a and 3b, which is the vital division in identifying “Best and Most Versatile Land” (BMV).

Natural England has produced regional maps showing the probability of BMV land. The West Midlands regional map (Natural England ALC016, 2017) shows the sites at Stanmore to have a moderate (20-60%) to high (>60% of the area) likelihood of BMV land.

The National Planning Policy Framework (2019), in paragraphs 170a&b notes, that policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing soils and recognising the economic and other benefits of best and most versatile agricultural land. ALC grading is determined by a range of both site and soil characteristics.

Some information on soils can be inferred from the published regional soil map of “The Midland and Western England” (Soil Survey of England and Wales). This shows that the majority of the area is mapped as the Bridgnorth and Salwick Soil Associations which comprise soils capable of growing a wide range of common agricultural crops (Soil Survey of England & Wales “Soils and their Use in Midland and Western England” 1984) .

These soil associations are also mapped on land to the south-east of the proposed sites, near Barnsley, where a detailed Post 1988 ALC map is available (www.magic.gov.uk). This map shows soils similar to those on the proposed sites with ALC grades ranging from 2 & 3a to grade 3b. Given the similar soils and similar climatic & topographical features of the Stanmore sites to the land near Barnsley, there is a high probability that a significant proportion of the proposed development area will comprise land of Grades 2 & 3a quality and hence be “Best and most versatile land” and so should be given due consideration in planning decisions.

The recent Covid 19 crisis had highlighted our need for food security but the UK has been declining in self sufficiency in food being only 64% self sufficient in 2019 compared to 78% in 1984 (<https://www.countrysideonline.co.uk/back-british-farming/back-british-farming-our-latest-activity/what-does-british-food-self-sufficiency-mean>). The NFU recently reported that the UK currently only produces 58% of the vegetables we consume and 16% of our fruit (<https://www.nfuonline.com/news/latest-news/nfu-calls-on-government-to-prioritise-food-security-and-address-uk-self-sufficiency>). Moreover the Climate Crisis requires action on reduction of carbon emissions and growing more food locally is necessary to address this. At a time when local food production in the UK is even more important, it is inappropriate and not sustainable for ‘Best and Most Versatile’ agricultural land to be permanently lost from production.

(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.

1. A detailed Agricultural Land Classification survey should be undertaken, by a suitably qualified professional soil scientist, before any decision is made on this land.
2. Auger borings for the survey should be carried out at an intensity of a least one per hectare allowing areas of ‘Best and Most Versatile’ land to be identified with confidence.
3. The results of this survey should be taken into account in development proposals to “avoid Shropshires Best and Most Versatile Agricultural Land (grades 1, 2 and 3a) wherever possible” as stated in DP 18 of the Pre Submission Draft. Where grade 3b or poorer quality land is present, these areas should be developed in preference to BMV land.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

Office Use Only	Part A Reference:
	Part B Reference:

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:

(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:

Date: 24/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

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- 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"/>	Policy:	<input type="text" value="DP18"/>	Site:	<input type="text" value="BRD030"/>	Policies Map:	<input type="text"/>
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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.

Pollution and Public Amenity:

DP 18 of the Pre-Submission Draft states:

“4. Development should avoid Shropshire’s best and most versatile agricultural land (grades 1, 2 and 3a) wherever possible,

The land on which the proposed Tasley Garden Village is to be built has not had a detailed Agricultural Land Classification (ALC) survey so no definitive information is available on the presence of “Best and Most Versatile Land” on this site as required for planning decisions.

The only published ALC map for the area is the Regional ALC map, available from Natural England, which shows the site as ALC grade 3. This map is an indicative small scale map (1:250,000 scale) and does not distinguish between grades 3a and 3b, which is the vital division in identifying “Best and Most Versatile Land” (BMV).

Natural England has produced regional maps showing the probability of BMV land. The West Midlands regional map

(Natural England ALC016, 2017) shows the site to have a high likelihood of BMV land (ie >60% of the area).

The National Planning Policy Framework (2019), in paragraphs 170a&b notes, that policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing soils and recognising the economic and other benefits of best and most versatile agricultural land. ALC grading is determined by a range of both site and soil characteristics.

Some information on soils can be inferred from the published regional soil map of “The Midland and Western England” (Soil Survey of England and Wales). This shows that the majority of the site is mapped as the Clifton Association which comprises soils capable of producing good yields of common agricultural crops (Soil Survey of England & Wales “Soils and their Use in Midland and Western England” 1984) .

This soil association is also mapped on land immediately to the west of the proposed site, where a detailed Post 1988 ALC map is available (www.magic.gov.uk), and shows these Clifton Association soils to be ALC grade 3a. Given the similar soils and similar climatic and topographical features of land on site to land shown as ALC Grade 3a immediately to the west of the site, there is a high probability that a significant proportion of the proposed development area will comprise land of Grade 3a quality and hence be “Best and most versatile land” and so should be given due consideration in planning decisions. Grade 3a land is ‘Good Quality Agricultural Land’ and should be retained for agricultural use wherever possible.

The recent Covid 19 crisis had highlighted our need for food security but the UK has been declining in self sufficiency in food being only 64% self sufficient in 2019 compared to 78% in 1984 (<https://www.countrysideonline.co.uk/back-british-farming/back-british-farming-our-latest-activity/what-does-british-food-self-sufficiency-mean>). The NFU recently reported that the UK currently only produces 58% of the vegetables we consume and 16% of our fruit (<https://www.nfuonline.com/news/latest-news/nfu-calls-on-government-to-prioritise-food-security-and-address-uk-self-sufficiency>). Moreover the Climate Crisis requires action on reduction of carbon emissions and growing more food locally is necessary to address this. At a time when local food production in the UK is even more important, it is inappropriate and not sustainable for significant areas of ‘Best and Most Versatile’ agricultural land to be permanently lost from production.

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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.

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1. A detailed Agricultural Land Classification survey should be undertaken, by a suitably qualified professional soil scientist, before any decision is made on this land.
2. Auger borings for the survey should be carried out at an intensity of a least one per hectare allowing areas of ‘Best and Most Versatile’ land to be identified with confidence.
3. The results of this survey should be taken into account in development proposals to “avoid Shropshires Best and Most Versatile Agricultural Land (grades 1, 2 and 3a) wherever possible” as stated in DP 18 of the Pre Submission Draft.

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- 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:

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Signature:

Date: 24/02/2021

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