

Appendix B

Worcestershire Minerals Local Plan (WMLP)

Best and Most Versatile Agricultural Land

In Chapter 15 of NPPF “Conserving and enhancing the natural environment”, para 174 states:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

2.b) 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;”

We do not believe that the WMLP takes sufficient regard of this requirement as evidenced by a number of examples as follows:

MMA3 – page 62, para 4.38 (now 4.71) – the latest document still includes *“This should include..... the need to safeguard the long-term potential of best and most versatile agricultural land, any opportunities to contribute to maintaining and improving health and well-being²⁵³, and any cumulative impacts or cumulative opportunities arising from the development itself and/or from other existing or ~~approved~~proposed development.”*

In our opinion, the main consequence of this modification should be that all of the sites in the Avon Valley should be excluded since they comprise primarily Grade 1 & 2 agricultural land.

MMc2 – page 17, para 2.25 – document states: *“~~50.8~~ 47.2% of Worcestershire’s sand and gravel ~~deposits~~ resources⁵⁰ are not affected by significant viability, environmental or amenity constraints”*

In our opinion, minerals extraction should be concentrated in these “unaffected” areas, rather than opening up new sites which may be affected by significant environmental or amenity constraints, e.g. destruction of best and most versatile agricultural land.

MMd2 – page 69, para 4.15 – document states: *“All proposals for mineral development both within and outside the strategic corridors will need to consider green infrastructure within the context of the particular site (policy MLP 7).”*

We question how does this comply with the need to safeguard the long-term potential of best and most versatile agricultural land, for example, all of the potential sites in the Avon Valley which mainly comprise Grade 1 & 2 agricultural land?

And within the same Main Modification (MMd2) – page 70, Existing Footnote 237: *Worcestershire Local Enterprise Partnership’s (2014) Worcestershire Strategic Economic Plan prioritises the visitor economy, agri-tech, horticulture and food production.*

Again, the same issue arises, i.e. minerals development of the sites in the Avon Valley, which mainly comprise Grade 1 & 2 agricultural land, is not consistent with Worcestershire LEP’s 2014 Strategic Economic Plan.

MMf1 – page 107, para 4.48, (now 4.82) – document states: *Mineral ~~working~~ development presents significant opportunities to deliver multifunctional gains through the integration of green infrastructure at a landscape scale. ~~Through the holistic consideration of the components of green infrastructure at a strategic level,~~ Green infrastructure priorities have been identified for each strategic corridor based on the consideration of a wide range of factors including the potential for working and restored sites to improve habitat networks; to support locally important economic sectors such as agriculture and the visitor economy; to provide social benefits through enhanced public access; and to deliver ecosystem services such as flood and climate change resilience.:*

In our opinion, the reference “*to support locally important economic sectors such as agriculture*” is not consistent with the intention to grant planning permission to develop sites comprising mainly Grade 1 & 2 agricultural land, e.g. those in the Avon Valley.

MMf2 – page 109, para 4.53 (now 4.89) – document states: *Agricultural land uses dominate much of this corridor and are an important part of the local economy. This area makes a significant contribution to Worcestershire’s strong base of horticultural and food sector businesses **NEW FOOTNOTE 1**, with 48.4% of the corridor being best and most versatile agricultural land,²⁶² and land use in the Principal Village Farmlands being very strongly based on cropping and horticulture ~~which is important to the local economy.~~²⁶³ Arable land uses and locally significant orchards also help to define the landscape character within the corridor.*

In our opinion, this section of the policy should imply that planning permission will not be granted for any new sites where the land in question is primarily “best and most versatile agricultural land” e.g. all of the sites under consideration in the Avon Valley.

MMf4 – page 111, para 4.61 (now 4.97) – document states: *Policy MLP 48 sets the priorities for the delivery of multifunctional green infrastructure in the Avon and Carrant Brook Strategic Corridor. ~~Each of the~~ The balance of priorities ~~for the~~ in this strategic corridor is intended to integrate the delivery of priority habitats alongside agricultural land uses, where these land uses are important to the local economy or the character of the area. The priorities will contribute to multiple green infrastructure components, deliver economic benefits (particularly for horticulture and agriculture), as well as providing climate change adaptation and mitigation as a result of contributions to improving water quality, flood betterment and reducing water shortages.*

In our opinion, the phrase “*deliver economic benefits (particularly for horticulture and agriculture), as well as providing climate change adaptation and mitigation*” should mean that the sites in the Avon Valley should not be considered for minerals extraction, as they are predominantly agricultural, providing both food and climate change mitigation, and most definitely important to the local economy.

MMf5 – page 112, para 4.79 (now 4.115) – document states: *Agricultural land uses dominate much of this (Avon and Carrant Brook) corridor and are an important part of the local economy. This area makes a significant contribution to Worcestershire’s strong base of horticultural and food sector businesses with 33.7% of the corridor being best and most versatile agricultural land.²⁸⁴ The free- draining, highly fertile sandy brown soils in the Settled Farmlands on River Terraces support an arable land use dominated by cash crops and market gardening.....*

In our opinion, this statement should rule out the Avon Valley sites from any proposed minerals development.

