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Response #1178995

From BleadonBOB

Date Started: 27 Nov 2023 16:58. Last modified: 27 Nov 2023 16:58

Status Complete

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Section 3 of the Biodiversity Supplementary Planning Document (SPD) sets the context of relevant policy and legislation which the SPD needs to comply with. Do you think that we have omitted any important, relevant policies or legislation?

- (●) Yes
- ( ) No

If 'yes', please detail what is missing:

How does farming fit with biodiversity plans such as 30 by 30 (or 30x30) a worldwide initiative for governments to designate 30% of Earth's land and ocean area as protected areas by 2030 (.e.g. UK Govt An extraordinary challenge: Restoring 30 per cent of our land and sea by 2030 (26JUL23 – p32)
https://www.bleadon.org.uk/media/other/24400/UKGovt30x30.pdf
How will the Government's 'Plan for Water: our integrated plan for delivering clean and plentiful water' (04 APR 23) affect farmers ability to farm and maintain nature recovery and BNG legal commitments, if they don't have enough water to irrigate, or being financially viable to do so?

https://www.gov.uk/government/publications/plan-for-water-our-integrated-plan-for-delivering-clean-and-plentiful-water/plan-for-water-our-integrated-plan-for-delivering-clean-and-plentiful-water

Please see attached document ‘Draft Considerations, Issues and Concerns relating to North Somerset Council Plans and Policies (incl Rural Strategy, Green Infrastructure & Corporate Plan, Local Plan and Biodiversity SPD consultations)’

This proposed Biodiversity SPD doesn’t appear to protect food production or food security, which is one of the UK government’s Critical National Infrastructure sectors. In response to the draft Local Plan in April 2022 Bleadon Parish Council asked North Somerset Council “to remove the ‘blanket’ renewable energy search areas over Bleadon. This will enable applications to be considered on an individual basis if they arise. The land in Bleadon is mainly Grades 1, 2 and 3a, which will enable Bleadon to focus on growing local food and food security”. Despite asking this there still appears to be no acknowledgement of the local food production and security critical issues across Bleadon and North Somerset in this SPD.

North Somerset Council’s (NSC’s) current draft Corporate Plan Action Plan consultation, pg23 states, "A Rural Strategy and action plan is developed and implemented with a series of focused actions that are aimed to support rural communities across the Corporate Plan ambitions for 2024 through to 2028." There appears to be no Corporate ambition in relation to food production and security in rural communities. How is this SPD progressing when the Rural Strategy, that would be expected to underpin and protect farming, food production and food security in the rural areas such as Bleadon, is not yet out for consultation? What is NSC’s plan for rural agricultural communities if the agricultural land is used for nature recovery, BNG, solar, etc.?

NSC Green Infrastructure Strategy refers to food and food production but this doesn’t seem to be reflected in other related SPD’s such as this Biodiversity SPD. According to the NSC Local Plan DP53, "The proportion of Grade 1 land in North Somerset is

approximately 7% and 10% for Grade 2.” NSC’s Solar Photovoltaic (PV) Arrays SPD only refers to Grades 1 and 2 land, which is only 17% of the land in North Somerset, but even this Best and Most Versatile land is not fully protected, e.g. Section 3.4, “We are not likely to support applications on the highest graded agricultural land (grades 1 or 2) and strongly encourage prospective developments towards the lowest graded land.” The government has stated that food is a critical national infrastructure issue. Therefore, we believe that food production needs to be addressed in local NSC policies to achieve this protection, to support our communities health and well-being with nutritious food, and Bleadon’s rural status.
https://www.npsa.gov.uk/critical-national-infrastructure-0

The UK Food Security Report 2021: Theme 2: UK Food Supply Sources, states "... food security means strong and consistent domestic production of food combined with a diversity of supply sources that avoids overreliance on any one source... Home-grown produce is the largest source of food for the UK... In meat, milk, and eggs, the UK produces roughly equivalent volume to what it consumes. In 2020 it produced 61kg of meat, 227L of milk and 172 eggs per person per year ... The UK produces a significant proportion of its other crop needs, including around 60% of sugar beet, 70% of potatoes and 80% of oilseeds... The UK produces over 50% of vegetables consumed domestically, but only 16% of fruit." If NSC policies are supporting and encouraging historical farmland fields to be put out of action for 30 years, regardless of whether it's solar, BNG, or housing, how will NSC ensure current food security levels be maintained in Bleadon and North Somerset? How can NSC help increase the current level of food security, especially in light of current wars and potential food importation concerns?
https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2021/united-kingdom-food-securityreport-2021-theme-2-uk-food-supply-sources

UK Govt Powering Up Britain Energy Security Plan, "The Government seeks large scale ground-mount solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. Solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land. We consider that meeting energy security and climate change goals is urgent and of critical importance to the country, and that these goals can be achieved together with maintaining food security for the UK. We encourage deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement. The Government will therefore not be making changes to categories of agricultural land in ways that might constrain solar deployment." and "We encourage deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement." (pg38) Although this NSC Biodiversity SPD may ensure or encourage wildlife to be pushed to the edges of solar fields, what does it do to ensure that multiple solar panel fields across North Somerset does not compromise food production? https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1148252/powering-up-britain-energy-security-plan.pdf

NSC has a Solar Photovoltaic (PV) Arrays SPD but not in relation to food production and food security. https://www.n-somerset.gov.uk/sites/default/files/2020-03/Solar%20photovoltaic%20array%20supplementary%20planning%20document.pdf

UK Govt Food Security Seventh Report (28 July 2023 footnote 11) states, “Defra is the lead Government department on food supply [PQ51874 28 September 2021], although the UKFSR states that “the role of government is an indirect one; to plan for and coordinate responses and intervene only where necessary to ensure the continuity of supply” given that the “underlying infrastructure of the supply chain is owned and

operated by private industry” How is this NSC Biodiversity SPD, that encourages offset land to be used for BNG, ensure that local food security isn’t compromised? How does it ensure that multiple small, medium and large parcels of land don’t remove productive agriculture land from the food production system? https://publications.parliament.uk/pa/cm5803/cmselect/cmenvfru/622/report.html#footnote-242

If local food security is compromised what is NSC’s natural food plan? What is NSC’s view on https://www.food.gov.uk/news-alerts/consultations/consultation-on-transitional-arrangements-for-edible-insects-in-great-britain

2

Do you think that the guidance in this SPD is clear?

- ○ Yes
- ◉ No

If 'no', what is not clear/how could it be made clearer – please include the relevant section reference(s):

North Somerset Council's (NSC) Corporate Plan, p7 states, "Weston-super-Mare – our largest town is set to become the second biggest settlement in the West of England over the next decade." At the 04 October public meeting in the Town Hall, Cllr Mike Bell, Leader of North Somerset Council, confirmed that this would be second to Bristol! How will this assumed large and rapid increase in population affect food requirements,

production and security, especially if existing farmland is built on?

What is the role and priorities of North Somerset Council with regards to protecting communities and local food security? Do NSC's energy security (solar) policies and strategies trump local food security? Does nature recovery (e.g. 10% BNG) trump local food security? Do carbon reduction (net zero) targets trump local food security? Will methane and nitrogen reduction (net zero) trump local food security?

NSC's Green Infrastructure (GI) strategy p60 "Within North Somerset, cattle grazed pasture not only provides soil carbon benefits, but is an important foraging habitat for the local populations of rare lesser and greater horseshoe bats, …" and "Well planned and managed, functioning green infrastructure is crucial for people, places and nature and is a key component in tackling the nature and climate emergency." It's unclear if/where food production and security is monitored within the strategy updates, reflecting on, "The GI Strategy covers 6 theme areas: Access Networks, Biodiversity and Habitats, Development Integration, Greenspace Stewardship, Trees and Woodland and Flood Risk and Water Quality"

https://n-somerset.moderngov.co.uk/ieListDocuments.aspx?CId=259&MId=1099

Will SMART meters be used to monitor, and potentially restrict and punish farmers (and residents) to meet biodiversity and sustainability goals? e.g. Energy firms pay out £11m after not fitting enough smart meters: Have customers had enough? Do they have the powers to forceably install meters to monitor and micro-manage residents? (10NOV23)

https://www.thisismoney.co.uk/money/bills/article-12730069/Energy-firms-pay-11m-not-fitting-smart-meters-customers-enough.html

Agricultural land seems to be being reallocated to BNG, nature recovery and solar that doesn't support food creation. It appears that farmers are being encouraged to diversification out of farming, into nature recovery and BNG projects, thereby putting local and national food security at risk. Farming should be given more support to ensure that food production is not threatened.

Biodiversity SPD Section 8.2.3 “There needs to be security of the delivering for biodiversity offsetting projects. The Environment Act requires that any enhancements or provision are maintained for at least 30 years after the development is completed, this will be enforceable through a condition, planning obligation or conservation covenant. This ensures that the habitats are maintained even if the land is sold. In the case where the off-setting land is outside of North Somerset, the relevant Local Planning Authority where the BNG site is located may need to be a signatory to the legal agreement. “
This identifies the need to secure biodiversity offsetting and protect the environment but not agriculture. How will NSC enforce these BNG projects? What will be the penalities if farmers need to revert back to the land for food production for national food security within the 30 year period? Will there be enough farmers, and related industry and young people educated or skilled, to farm the land after the 30 years? Instead, can current agriculture be encouraged and supported to improve the land and ecology/biodiversity via BNG projects rather than removing the land from the food system? Can the Biodiversity SPD help create more nutritionally dense food and improve people’s health and well-being, which is one of NSC’s Corporate ambitions? Can NSC support farmers to continue to make local food production financially viable? Can NSC support rural communities by encouraging and supporting an increase in local smallholdings, using traditional proven crop and animal rotation techniques, working in partnership with nature and increasing biodiversity? If solar targets need to be met can NSC ensure that they are put on housing, warehouses, supermarkets, car park roofs not on agricultural fields?
Biodiversity SPD Section 8.6.4 “The Council reserve the right to undertake compliance checks on both on-site and off-site BNG habitats. If there is failure to deliver, or attempt to deliver, biodiversity net gain outcomes which are secured through planning legal agreements or planning conditions, the Council will take the appropriate and necessary action to ensure compliance.“ What is the ‘appropriate and necessary action’? What are the penalities?

3

Do you think that this SPD will help us achieve the positive outcomes for biodiversity required by national legislation and our adopted Local Plans?

- ○ Yes
- ◉ Somewhat
- ○ No

Please explain your answer if required:

The UK Food Security Report 2021: Theme 2: UK Food Supply Sources, states "... food security means strong and consistent domestic production of food combined with a diversity of supply sources that avoids overreliance on any one source... Home-grown produce is the largest source of food for the UK... In meat, milk, and eggs, the UK produces roughly equivalent volume to what it consumes ... The UK produces a significant proportion of its other crop needs, including around 60% of sugar beet, 70% of potatoes and 80% of oilseeds... The UK produces over 50% of vegetables consumed domestically, but only 16% of fruit." If NSC policies are supporting and encouraging historical farmland fields to be put out of action for 30 years, regardless of whether it's solar, BNG, or housing, how will NSC ensure current food security levels be maintained in Bleadon and North Somerset? How can NSC help increase the current level of food security, especially in light of current wars and potential food importation concerns?
https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2021/united-kingdom-food-securityreport-2021-theme-2-uk-food-supply-sources
In order to be food secure, it appears that the UK cannot afford to lose any agriculture land and indeed needs to increase vegetable and fruit production.
SC's Policy DP5: Climate change adaptation and resilience and Policy DP341: Green

infrastructure: We believe that green roofs and walls in the Local Plan will not compensate for the loss of agriculture fields, after all where will the cows and other animals (other than solar sheep) graze, certainly not on roofs? Solar panels should be on/integrated into roofs not fields.
The current Local Plan consultation DP Policy DP7: Large scale renewable and low carbon renewable energy states, “Priority will be given to proposals with potential for positive cumulative impacts with other renewable energy schemes, developments on previously development land and solar photovoltaics on roof tops. On greenfield sites, all proposals should seek to support continued agricultural use and biodiversity improvements.” We believe that neither this Biodiversity SPD nor the current proposed Local Plan clearly indicate how the existing agricultural use will be monitored and maintained, rather than eroded by nature recovery/BNG projects.
https://n-somerset.moderngov.co.uk/documents/s5151/
09.1%20Local%20Plan%20Reg%2019%20Executive%20Committee%20October%202023.pd

Depends how biodiversity is measured, and whether biodiversity and/or the Local Plan (with its blanket solar proposals) has greater priority than food production and related public health.
Not all farmers are landowners. Landowner decisions to use the land for BNG, supported by NSC policies, may force farmers to diversify and stop food production due to lack of, or limited land availability. e.g. via reclassification from agriculture to BNG projects, trees, solar, roads, etc.
Providing and securing Biodiversity net gain Section 8.1.1 “The Council’s preference is for on-site compensation and BNG measures. If this is not possible then, providing and securing biodiversity net gain should use this sequential approach: “ (see figure on page 34)

Biodiversity Offsetting – Off-Site Provision Section 8.2.1 “If it is not possible to achieve 10% net gain on site, then developers can deliver off-site BNG using the same assessment process on the off-site land to calculate how many units the site can deliver as compensation. It is also expected that a 30-year management and monitoring plan will be needed to be submitted as part of the planning application. It is the applicant's responsibility to secure off-site BNG, and should consider the options outlined in Table 4: “

What stops the majority, if not all, NSC agriculturally classified land (e.g. grades 1-3a/b) being used or sold for nature recovery BNG credits? What if the BNG land runs out for North Somerset development or is used up by other authorities outside North Somerset trying to achieve their 10% mandate?
BNG 10% means 10% more species, that’s not the same as an ecologically sound, naturally balanced approach. If bats and birds can’t hunt over the area e.g. due to solar panels, the types of species will also change, similarly with ground foraging animals. It is possible that BNG could effectively become a counting species exercise, rather properly working with nature, food production and rural communities.
According to the NSC Local Plan DP53, 77% of North Somerset is capable of supporting, or is currently supporting food production. E.g. (p182) Best & Most versatile land states, "The proportion of Grade 1 land in North Somerset is approximately 7% and 10% for Grade 2. 60% falls in Grade 3..." How much of this land is already in use as food production for people and animals, regardless of whether it is 3a or 3b, the latter seemingly a target for solar, housing, nature recovery, BNG, etc.?

NSC’s Solar Photovoltaic (PV) Arrays SPD Section 4.6 “Solar PV facilities that are developed on agricultural ground must be ‘reversible’ allowing the site to be easily restored to agriculture. Hence intrusive groundworks, such as trenching and foundations

should be minimised and the use of concrete avoided where possible. Frames should be pile driven or screw anchored and not concrete-based, and capable of easy removal, allowing the ground to be fully restored. In windy areas the stability of the installation will need to be considered." Has NSC any proof that the land can be 'easily restored to agriculture' after 20 years or more? Is there any panel 'run off' issues with regards to soil erosion, quality and chemical pollution? How are these potentially millions of panels going to be disposed of, what will be the effect on the environment, either in the UK or shipped abroad? How are solar panels currently being decommissioned?
NSC's Solar Photovoltaic (PV) Arrays SPD Section 4.14 "In most instances the ground beneath solar panels is capable of remaining in agricultural use. Existing pasture cover should be maintained, whilst if the land is currently arable, applicants are advised to grass-seed the site. The land will require management, and the preferred option is that sheep grazing or similar should be enabled. If the grass is to be mown, then the potential for habitat gain, through wildflowerseeding, should be considered." Does NSC know the effect on the soil of potentially just grazing sheep and not crop or animal rotating for 20 years or more? What will be the effect of grazing sheep rather than cows in relation to the production of beef and dairy (milk, cheese, yoghurt, butter, buttermilk, etc.) What is the effect of using chemicals for invasive weeds, under and or around solar panels, for 20 years?

4

Can you tell us of any case studies (from an English Local Planning Authority) which demonstrate good examples of how Biodiversity Net Gain is being used, or other best practice that we could incorporate into this SPD to add value? Please include any links as necessary.

Have any long-term real-world trials or research (decades) been undertaken by English

Local Planning Authorities proving, on large scale areas, that the BNG approach of people managed land will give the desired output and not result in invasive plant species (e.g. brambles) and/or an increase in vermin (rats)? Or have assumptions been based on scaled up computer modelling?

Have any nature recovery/BNG projects led to increased agriculture and related benefits?

Will the UK BNG approach of removing farmland (for 30 years or permanently) achieve the same disastrous goals as the Dutch, Irish and Sri Lankans agriculture reductions, with a resulting increase in farming crisis and increased suicides? E.g. The EU approves Dutch plan to forcibly close farms,""Farmers who decide to close their holdings must guarantee they will not start up livestock farming operations elsewhere in the Netherlands or within the EU" (04MAY23) – In relation to UK BNG, even if their family and or the nation is in a food crisis and potentially starving, how can farmers/landholders break their legal commitments, what would be the penalty? https://www.fwi.co.uk/news/eu-approves-dutch-plan-to-forcibly-close-farms The Malaysian government banned fertilisers and put the country into poverty, famine and suicides. Fertiliser ban decimates Sri Lankan crops as government popularity ebbs (03MAR22) https://www.reuters.com/markets/commodities/fertiliser-ban-decimates-sri-lankan-crops-government-popularity-ebbs-2022-03-03/ Ukraine Food crisis grows as spiralling prices spark export bans. Ukraine bans wide range of agricultural exports "LVIV, Ukraine, March 9 (Reuters) Ukraine's government has banned exports of rye, barley, buckwheat, millet, sugar, salt, and meat until the end of this year, according to a cabinet resolution published on Wednesday. Serbia bans exports of wheat, corn, flour and cooking oil. Yara curtails fertiliser output in Italy and France” (09MAR22) https://www.reuters.com/world/food-crisis-grows-spiralling-prices-spark-export-bans-2022-03-09/

If you would like to upload any supporting documents with you response please attached them here:

You can upload up to 4 files.

Draft NSC Rural Strategy Considerations 17NOV23.pdf

5

Do you have any other comments on the SPD?

The UK has a Farming Crisis "The UK's self-sufficiency is 'slipping', with many growers reporting receiving minuscule return" ... "As NFU president Minette Batters put it in December, the very existence of British food production is now "under threat" What are NSC's policies doing to protect farming and local food production? Is it protecting its farmland or selling it off, e.g. for development?
https://www.thegrocer.co.uk/sourcing/is-british-farming-facing-an-existential-crisis/678965.article
If there are NO FARMERS there is NO FOOD and a poorer local and national economy will result. As meat, dairy and vegetables stop being grown locally, increasing food costs, more people will be driven towards food banks. What can NSC and its Policies do to HELP small and medium sized local farming and food security? The House of Commons 18OCT23, "The Trussell Trust, an anti-poverty charity that operates a network of food banks across the UK, reported a 37% increase in the number of three-day emergency food parcels it distributed between 31 March 2022 and 1 April 2023, compared to the year before. This continues a general trend of increasing need for food parcels. In 2021/22 there was an increase of 14% compared to the year 2019/2020, before the Covid-19 pandemic. The increase in the year 2020/21 was caused by the pandemic, while the most recent increase is due to the cost of living crisis." (18 OCT 23)

https://commonslibrary.parliament.uk/research-briefings/cbp-8585/

Other comments raised with BOB include:

• What is the food chain losing by the proposed NSC plans?

• What is the land currently contributing to food security?

• DP53 Best & Most versitile land in Draft pg 181 "The proportion of Grade 1 land in North Somerset is approximately 7% and 10% for Grade 2. 60% falls in Grade 3..." How much of this land is already in use as food production for people and animals? How much land will be lost if NSC's Local Plan and associated Biodiversity plans happen?

• What arable and/or pastoral farming is currently supported?

• What has been supported over the last 10 years?

• When was the land last producing food for animals or people?

• Can beef and dairy cattle graze the same land as solar panel?

• What will happen to local and national dairy products if the land only supports sheep? (milk, cheese, yoghurt, butter, spreads, etc.)

• How much infrastructure is required to install, support and maintain a field of thousands solar panels?

• concreting in solar panel supports? electrical wiring? sub-station wiring?

• how much does rainwater runoff concentrate on the land? how much erosian over the 25 year life span? How much potential leeching of into the soil?

• Will local generatiional farming skills be lost? What will happen over the 25-40 year lifespan of the solar panels and/or BNG projects?

• who are the mahority of investors in these large local solar and BNG projects? do they have a genuine interest in the local community or is it just a planning obligation and/or financial investment that can ultimately break rural communities?

• how do commercial these investments affect public access and views to the countrysiide?

• how do structures in fields (solar arrays) affect birds of prey hunting, as they need large

open areas to swoop and large independent areas to sustain current and future populations.

• how are small mammals affected structures will change the balance of that ecology, some mammals will thrive at the expense of others, upsetting the natural balance (e.g. an increase in rat population due to more urban style shelter under solar panels? How would this population be controlled e.g. rat poisons?)

• how do the change in wildflowers, plants, etc. affect the types of species that can then survive in that hababit?

• how will desktop AI deal with the above if no ecologist input is given?

• over 20-40 years lifespan of the panels and BNG projects, how are natural invasive species such as brambles controlled, with chemicals be used? e.g. glyphosate "a widespread herbicide used by farmers to control weeds and as an alternative to ploughing, which disturbs the life beneath the soil and releases carbon (but has pupport food production locally for generations since the bronze age)"? (14JUN23)

• if glyphosate is used, along with panel run off, the soil may become contaminated, what will happen to the sheep, lamb that is eaten, and future agricultural use if/when the panels are decommissioned?

• how long will the land need to recover after decommisioning? Months, years or decades?

• what happens to the millions of solar panels afterwards and the toxic chemicals contained within them? "The toxic chemicals in solar panels include cadmium telluride, copper indium selenide, cadmium gallium (di)selenide, copper indium gallium (di)selenide, hexafluoroethane, lead, and polyvinyl fluoride" (30APR18 and 22AUG20)

• CPRE The problem with solar farms the factors that should be considered in determining applications (2021)

• if the aim is to increase biodiversity via BNG how does this offset any potential loss of species on the original site, e.g. new structures and/or solar panel installations (whether

mammals, insects, plants, etc.)?

• NB: NSC support solar and installion companies and so it should therefore be able to answer the solar related questions

• protecting of Bleadon as a rural/farming community

• ensure that future food production and security be considered across all NSC plans and policies, including the Biodiversity SPD

• ensure that any potential conflict between the GIS datasets be resolved before deciding on any land use allocations/projects in any NSC plans or policies, whether for solar, wind, housing, roads, nature recovery, BNG projects, etc.

• not all farmers are landowners, landowner decisions supported by NSC policies may force farmers to stop due to lack of or limited land availability. e.g. via reclassification from agriculture to trees, solar, roads, etc.

• concern over 3a/3b land categorisation, potential determination by developers in development rather that food production benefit, use of 3b for other than farming crops/ food/meat/dairy

• protection of BNG credit/land projects for NSC requirements, rather than towns/cities, e.g. Bristol (only possible for NSC owned land?). Potential for smaller developers at a disadvantage to larger ones when 'bidding' or finding offset credits (NSC may have enough credits for North Somerset's known developments but these may be used by developers in other areas e.g. former Avon, Somerset, etc.?)

• solar influence of grazing sheep rather than cows/cattle, and effect on bats, dairy and human health

effect of solar and nature recovery/BNG projects to potentially remove generational farming, and related skills in the area, as potentially ties up the land in a non-agriculture status for 30 years.

e.g. solar Langford development using Grades 3b and 4 with sheep not beef/dairy, Gloucestershire Solarshire

• concern over tying up land for 30 ears with the land without knowing the full legal ramifications up front as this is new territory/legislation e.g. if landowner circumstances change over the 30 years, health or death, land needed due to food shortages/war, floods, etc.

• if nature recovery/BNG land is not maintained to agreed standard, what is the legal and financial effect on farmers/landowners? Current enforcement of penalties unclear (clarification due end of Nov?)

• environmental legislation is driving demand ahead of qualified professionals (https://cieem.net/a-crisis-in-our-sector/)

• use of image processing rather than qualified ecologists, resolution affecting land categorisation and related type of required BNG credits/nature recovery projects and related developer and landowner payments

It seems that the risk of BNG projects lays with the landowner/farmer for 30 years, not necessarily the developer who has bought the BNG credits. Will NSC guarantee that the methods used to maintain BNG today today be permitted in the future, and at similar accessibility and cost? For example, if NSC or the government bring in water, chemical or energy restrictions the farmer/landowner will not be able to maintain the land in the same manner or at the same cost, thereby potentially incurring a significant loss. Section 8.2.3, "… the habitats are maintained even if the land is sold." As the land has been tied up for 30 years in a legally binding BNG contract, they cannot even diversify back to farming, which may at some point be more financially viable and nationally necessary due to a limited availability of land to grow local (cheaper) food. This rigid BNG approach could potentially result in no skilled farmers, no land and limited food, affecting the landholder, farmer, communities, families and individuals.