

**From:** Bleadon BOB Community Website <bleadon@live.co.uk>

**Sent:** 22 January 2024 16:58

**To:** Planning Policy <planning.policy@n-somerset.gov.uk>

**Subject:** Comments on North Somerset Local Plan 2039: Pre-submission Plan (Reg 19)

To Whom it May Concern,

We are having connectivity issues, please consider below and attached as our submission to the Local Plan consultation due to close today. If you require any further information please do not hesitate to contact me.

**Compliant** – We do not believe that the plan meets the legal requirements made under various statutes

**Sound** – We do not believe that the the plan been positively prepared, is it justified, effective, and consistent with national policy with regards to farming, food production and food security.

**Meet the Duty to Cooperate** – We do not believe that the council engaged and worked effectively with neighbouring authorities and statutory bodies.

We would like to appear and be heard at the hearing.

Kind regards,

Jo

email: [bob@bleadon.org.uk](mailto:bob@bleadon.org.uk)

web: [www.bleadon.org.uk](http://www.bleadon.org.uk)

twitter: @bleadon

facebook: BleadonBOB

latest news: <http://www.bleadon.org.uk/news.html>

-----

**Compliant** – We do not believe that the plan meets the legal requirements made under various statutes

**Sound** – We do not believe that the the plan been positively prepared, is it justified, effective, and consistent with national policy with regards to farming, food production and food security.

**Meet the Duty to Cooperate** – We do not believe that the council engaged and worked effectively with neighbouring authorities and statutory bodies.

We would like to appear and be heard at the hearing.

Intro

NSC held 18 separate public meetings for its Corporate Plan consultation, as far as I'm aware there were none for this Local Plan consultation. Local Plan 2030 Pre-Submission Document is 300 pages long with over 50 supporting documents. How are residents and Town & Parish Councils supposed to comment on this, especially over the Christmas and New Year holiday period? How many Town & Parish Councils responded to this consultation as resident's representatives? How many councillors made their parishioners aware of this important consultation via their meeting agenda?

Local Plan Introduction states, “The Local Plan will provide a positive vision for the future of North Somerset, a framework for addressing housing needs, employment requirements and other priorities and a mechanism through which local communities can help shape their surroundings. The heart of the planning system is the delivery of sustainable development which comprises interdependent economic, social and environmental objectives... The key challenges included the climate and nature emergencies, the scale of the government’s housing requirement, improving design quality and placemaking and responding to the impact of the pandemic on society and economic growth. “ None of these address food production and security which should be a priority for people’s health and well being.

## Vision

“The Local Plan vision is our aspiration as to what good development will look like in the future and reflects the corporate values of open, fair and green. This is then reflected in the council’s strategic priorities.“ farming, food production and security is not a NSC strategic priority or ‘ambition’ in its Corporate Plan, despite it being one of the government’s 13 Critical Infrastructure Sectors. NB: The “Government and the [food production] sector will continue to work together to ensure the resilience of food supply.” NSC policies do not protect this supply nor the land needed to produce it?

Details are stated to be in SPDs that are as yet to be drafted or updated with the NSC proposals. How can residents know and agree the extent of NSC plans if they are not yet fully formed?

Not all farmers are land owners. Those that are not landowners depend on their landlords to continually extend their leases, so that they can continue to farm. The actual land owners could live in the community, another part of the country, even abroad, using the land for investment purposes (e.g. in 2018 Bristol Airport was majority majority owned by Ontario Teachers’ Pension Plan Canada!)

NSC’s proposed Draft Rural Strategy is still unpublished. How is NSC and its policies strategically assessing and protecting farming, food production and food security in North Somerset and across neighbouring districts?

## DEFRA Agriculture in the UK Evidence Pack September 2022 update (PDF)

"20% of England’s sheep herd is in the South West 39% of England’s dairy herd is farmed in the South West. The West Midlands has the smallest average farm size compared to the average for England, closely followed by the South West [so if small farms are encouraged to diversify e.g. solar, BNG, nature recovery, housing, etc. food production and security will be affected] In 2020, after deductions for wages, rent, interest and asset depreciation and taking subsidy contributions into account, the total income from farming in England was £3.6bn, with the South West contributing the most (19%) and the North East the least (4%). Since 1988, the amount of food consumed in the UK of UK origin has fallen from 66% to 58% and the amount of food consumed of EU origin has risen from 18% to 23% over the same period. However, food of UK origin rose 4% and food from EU origin decreased 5% in 2021 compared to 2020.." Govt Farming and environment evidence packs [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1106562/AUK\\_Evidence\\_Pack\\_2021\\_Sept22.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1106562/AUK_Evidence_Pack_2021_Sept22.pdf)

NSC is borrowing and spending large amounts of money on climate, natural & environmental issues/non-agricultural land use but not farming, food production and security that are immediate essential to life. E.g. Rural England Prosperity Fund - DP566 £177K in 2023/24 and £266K in 2024/25 vs Millions on Decarbonisation of heat (boilers) £1.8 million, Decarbonisation at Campus £1,197,000, Eco Bus (library outreach vehicle (mobile replacement) £175K, Office for Low Emission Vehicles (OLEV) £212,508, Waste & Recycling - vehicles and electric vehicle top-up £12,352,595, Environmental Services & Safer Communities - overspend of £1.423m, Purchase of Land to support biodiversity net gain £300K, Land for Yatton Secondary £2 million, Land at Parklands Village £384,527, Land Release Fund - Churchill Avenue, Clevedon £350K, Land Release Fund - Uplands, Nailsea £481,020

NSC faced "... a £50 million budget gap between now and 2028 - but since then, they've narrowed that to just £13 million. Just under £4 million of that needs to be found for the next financial year." "At this time the council expects to receive £314.625m of grants and contributions from external stakeholders to fund specific schemes, which is the largest component of the programme, although the council will need to borrow £111.132m in order to be able to deliver all aspects of the programme." How much public land has NSC sold and for what purposes? In particular, how much smallholding land has been sold, and what effect has this had on farming? The total area of NSC smallholdings land as at 31 March 2022 amount to 166ha (410 acres). See similar area to the Langford solar developments which are only two of many proposals.

(p177) Policy DP43: housing (including rural exception schemes)

"Developments will be expected to provide 38.5% affordable housing on greenfield sites and 20% on previously developed land."

NSC definition "Sustainable development: Development which meets the needs of the present generation, without compromising the needs of future generations to meet their own needs." (LP Glossary)

NSC policies need to protect the future of farming, food production and security for future generations.

(Page 98) Local Plan Policy DP7 Large scale renewable and low carbon renewable energy

NSC definition "Renewable energy: Energy generated from the sun, the wind, water and plant material (biomass)." "Proposals for energy generation from renewable and low carbon sources including wind turbines, solar photovoltaic arrays, biomass and hydropower (marine, river and tidal) schemes will be supported subject to no unacceptable impact on: (a variety of caveats including) ...Infrastructure assets including power lines, roads, rail and aircraft safety."

Food is one of the government's 13 Critical Infrastructure Sectors, NSC's policies do not reflect this status, however, "On greenfield sites, all proposals should seek to support continued agricultural use and biodiversity improvements" NSC should ensure that the diversity of that agriculture remains, e.g. dairy and crops (for people and animals) should not be sacrificed for sheep.

"Proposals for biomass/bioenergy developments will be approved provided they are of a scale and type which is appropriate to the location" "NSC definition "Bioenergy: Energy that is made from biomass or biofuel. Biomass: Organic material of biological origin (plant or animal), used as fuel to produce electricity or heat. This will include wood, energy crops or

animal waste from farms." (Glossary) Biomass/Bioenergy production should not replace the land use food production for people and animals.

"North Somerset Wind Energy and Solar PV Supplementary Planning Documents will be updated to highlight potential locations identified as most technically suitable areas for renewable energy schemes from the Renewable Energy Resource Assessment Study (2021)." NSC current SPDs Solar Photovoltaic (PV) Arrays SPD 2013 and Wind Turbines 2014?

How are ethical and environmental issues, both in the UK and source material countries, to be addressed e.g. production (e.g. mining - slave and child labour/health & safety <https://www.theguardian.com/global-development/2021/nov/08/cobalt-drc-miners-toil-for-30p-an-hour-to-fuel-electric-cars>), use of coal powered stations to make solar solar and wind turbine, etc., shipping (carbon miles), decommissioning (landfill & other environmental issues).

Where are these updated documents published? Why is the detail of these important documents not updated and referenced during this consultation?

Independent analysis of the carbon emissions associated with new nuclear plants have demonstrated they have smaller lifetime greenhouse gas footprint than that created by solar power and about the same as wind power. It also operates 24/7, not just in the daytime or on sunny or windy days. (EDF and IPCC) Wind, solar nuclear hydrogen in govt doc.

"The SPD will also provide guidance in relation to the Landscape Sensitivity Assessment (2021), which assessed the landscape sensitivity of different parts of North Somerset in relation to solar PV and wind turbine development." C.67 "LCA G1 has a lower landscape sensitivity to solar PV developments as it has a greater sense of visual enclosure provided by the gently undulating landform and surrounding woodland and mature hedgerow boundaries." C.68 "LCA G2 has a slightly higher sensitivity to solar PV developments due to its more open character with low hedgerows, and the high frequency of seminatural habitats and historic features..." (pg 140) The Bleadon Levels/aka Moor has an open character and therefore highly sensitive to development, multiple small scale developments would detrimentally affect this character as they would be highly visible. Also, would disturb, and potentially kill, bird wildlife (solar – removing open hunting ground for birds of prey. Wind - birds striking spinning wind turbine blades and being damaged or killed). Where is the NSC research on these potentialities? (e.g. December 2023 "A French wind farm that was found to have killed over 1,000 birds, including a golden eagle, will be torn down on court order. The Nîmes Court of Appeal ruled that the wind farm – based in the town of Lunas in the south of France – must be demolished and the land returned to its original state. The court found that the turbines had been built on a site they should not have been following a defective impact assessment." <https://www.rechargenews.com/wind/court-orders-wind-farm-to-be-torn-down-after-golden-eagle-death/2-1-1572327>

"For some uses it may be possible to return the land to productive agricultural use without any loss of quality, should the proposed use no longer be required. For example, solar farms or similar. Suitable measures will be put in place to ensure this could be achieved." What suitable measures can be put in place? What research has been undertaken to ensure that the land can be returned to agriculture without damage (e.g. lack of crop rotation, grazing, water damage to the soil from runoff from solar panels for several decades)? How is the damage to local farming communities quantified and protected? What about the skills and economy that will be removed during the 20-30 life span of these developments? How will the

younger farming generation be able to farm, and practice farming, if this land is removed from available food production? What will happen to dairy farmers, and associated large and small industry, if solar fields switch to sheep farming? What will happen to the related industries including abattoirs, butchers, retail, mechanics, drivers, etc.?

(p204) NSC Local Plan DP53 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..."

In April 2023 at the annual parish meeting, Bleadon residents raised concerns about North Somerset Local Plan Policy in relation to solar panels and wind turbines on agricultural land and its impact on farming. 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, Biodiversity Net Gain, etc.? Note that the 3b land classification is said to be 'moderate quality agriculture land', not poor or useless, and has a role in current farming (See Langford Mega-Solar Development on grades 3b and 4 agriculture land) No mention of 3b or quantification of the area of land involved? How is the damage to local farming communities quantified and protected? What about the skills and economy that will be removed during the 20-30 life span of these developments? How will the younger farming generation farm, and practice farming, if this land is removed from available food production? What will happen to dairy farmers, and associated large and small industry, if solar fields switch to sheep farming? What will happen to dairy farmers, and associated large and small industry, if solar fields switch to sheep farming? What will happen to the related industries including abattoirs, butchers, retail, mechanics, drivers, etc.?

(p205) Local Plan DP54 Rural Workers Housing

"Farmers are encouraged to diversify their activities and supplement their income from enterprises other than normal food production." What is being done to protect or 'offset' the land and skills for the existing food production and food security? What is NSC doing to improve farming, food production and food security locally?

(p91) Policy DP5 Climate change adaptation and resilience

"Protect spaces for local food production and market gardening including allotments, tree planting, community orchards, community gardens and identify opportunities for community composting"

"A Supplementary Planning Document (SPD) will be prepared to set out the detail for how these policy requirements will be implemented."

Where is the detail of this document? Will it include protecting farming? Where is NSC's research that its adaption and resilience proposals have been proven to improve and not damage the environment, especially over the long term, and especially in relation to food production and security?

"If we roughly estimate that an average person exhales about 0.66 kilograms of CO<sub>2</sub> in a day, this means that a world population of about 7 billion people will exhale around 1.7 gigatons of CO<sub>2</sub> into the atmosphere each year." Is NSC intending to factor this in somehow?

(p93) Local Plan DP6 Net Zero Construction

What level of atmospheric carbon dioxide is NSC aiming for? How will they measure it?  
NB The air we breathe contains 0.04% carbon dioxide, yet people (mammals?) breathe out 4% carbon dioxide (e.g. BBC Bitesize) Will NSC be aiming to monitor people and animals/pets' individual CO<sub>2</sub> output (breathing, eating, clothing, travelling, purchasing, etc.) and penalise them according to some NSC determined and democratically agreed criteria? Will those that can afford offsets/have money be put at a greater human advantage through these NSC related policies, we all have a right to live, work and breathe not just those who can afford offsets?

For example, Wiki "Carbon offsetting is a trading mechanism that allows entities such as governments, individuals, or businesses to compensate for (i.e. "offset") their greenhouse gas emissions by supporting projects that reduce, avoid, or remove emissions elsewhere"  
[https://en.wikipedia.org/wiki/Carbon\\_offsets\\_and\\_credits](https://en.wikipedia.org/wiki/Carbon_offsets_and_credits)

Wiki, "Carbon rationing, as a means of reducing CO<sub>2</sub> emissions to contain climate change, could take any of several forms.[1] One of them, personal carbon trading, is the generic term for a number of proposed carbon emissions trading schemes under which emissions credits would be allocated to adult individuals on a (broadly) equal per capita basis, within national carbon budgets.[2] Individuals then surrender these credits when buying fuel or electricity. Individuals wanting or needing to emit at a level above that permitted by their initial allocation would be able to purchase additional credits in the personal carbon market from those using less, creating a profit for those individuals who emit at a level below that permitted by their initial allocation" [https://en.wikipedia.org/wiki/Personal\\_carbon\\_trading](https://en.wikipedia.org/wiki/Personal_carbon_trading)

Read article, "Good God! Is Britain really going to jail people who disagree with net zero?"  
<https://www.express.co.uk/comment/expresscomment/1809903/Uk-net-zero-rules-energy-bill-jail-for-new-zero-jacob-rees-mogg>

Read Government Energy Bill, "...under this new legislation, those who fail to adhere to energy consumption regulations could face imprisonment for up to a year and fines of up to £15,000"

Local Plan, "... getting design right from the outset is much more cost effective than needing to retrofit later. " Why would a new building that has gone through approved building regulations need to be retrofitted later? Is NSC planning to apply these standards to existing residential and non-residential buildings at some time in the future? "The report recommends a space heating demand of 15-20kWh/m<sup>2</sup>/year by 2025 at the latest. ...guidance on meeting net zero recommends a maximum total energy use of 35 kWh/m<sup>2</sup>/year" What if you use more? What if offsets can't be afforded? Will smaller businesses be forced to close due to inability to pay for any stated offsets or onsite renewable energy production? How will NSC policies protect farming and small businesses?

"Renewable Energy Offsetting Residual energy demand should be met through the generation of onsite renewable energy, but if this is not technically feasible, the requirement may be met elsewhere by means of offsite renewable energy generation." What is NSC's expectations for old/ residential and non-residential buildings?

"Renewable energy offsetting must only be used where it is demonstrated as not technically viable to meet the residual energy demands through onsite renewable energy generation. This is to ensure that new buildings are as energy efficient as possible and will not need retrofitting in the future. The council has a renewable energy offset scheme. Renewable energy credits will be purchased in order to achieve the net zero energy balance. This will be an agreed cost per kWp or per kWh generated, to meet the net annual energy demand for a scheme. The price per kWh generation shortfall will be agreed at planning application stage.

An update to Creating Sustainable Buildings and Places Supplementary Planning Document will set out the process for securing offset credits, where these are required". NSC are creating schemes, with public money, to penalise people who do not achieve their set standards.

"A building's energy use is now considered to be the best measure for net zero compliance, whilst reducing emissions on-site is no longer the best measure of sustainable design. Total energy use and space heating metric targets are considered to be the best mechanism to model and monitor net zero compliance because the electricity grid is decarbonising. One of the key advantages is that these metrics can be checked once the building is occupied without requiring further modelling or analysis."

Local Plan Glossary re: Absolute Net Zero and Net Zero Operational energy and Net zero whole life carbon building and Net zero embodied carbon building and Net Zero Energy Standard: How will NSC treat existing old buildings with regards targets and offsets (e.g. retail, farming, etc)? How much of this 'off-site' renewable energy will use food production land?

Carbon offsetting report – 'Carbon offsetting within an energy intensity policy framing Report to West of England Authorities Final' 30 June 2022, "Prioritising rooftop solar would minimise the use of agricultural land for solar development and the associated landscape and other impacts. This is likely to align with understandable public and political opinion that we should prioritise rooftop installations ahead of greenfield solar." So why is NSC proposing solar and wind on the Bleadon Levels and throughout North Somerset, especially on food production land. Solar on roofs not fields.

"... there are legitimate trade-offs between the use of roof-space for renewable energy generation to get to a net zero operational balance, and the use of limited roof space to meet policy requirements around climate adaptation, for instance for green roofs to provide habitat and mitigate overheating or the provision of roof gardens or amenity space for residents. This might mean that in inner urban areas where overheating is likely to be a greater concern, authorities place a greater emphasis on climate adaptation considerations and accept slightly greater use of off-site renewable energy to achieve a net zero operational balance." Does this mean NSC policies put greater emphasis on 'climate adaption' rather than on food production and security? Will inner urban areas, that have little/no open land, be looking to use rural NSC countryside to achieve their chosen net zero targets? How does NSC intend to protect agriculture and 'offset' food production and security?

What level of atmospheric carbon dioxide is NSC aiming for? How will they measure it? Is NSC aiming to penalise each resident for its CO<sub>2</sub> output? NB The air we breathe contains 0.04% carbon dioxide, yet people/animals breathe out 4% carbon dioxide (e.g. [BBC Bitesize](#)) Will NSC be aiming to monitor people and animals' personal CO<sub>2</sub> output and penalise them according to their determined criteria? Will those that can afford offsets/have money be put at a greater human advantage through these NSC related policies, we all have a right to live, work and breathe not just those who can afford offsets?

For example, Wiki "Carbon offsetting is a trading mechanism that allows entities such as governments, individuals, or businesses to compensate for (i.e. "offset") their greenhouse gas emissions by supporting projects that reduce, avoid, or remove emissions elsewhere" [https://en.wikipedia.org/wiki/Carbon\\_offsets\\_and\\_credits](https://en.wikipedia.org/wiki/Carbon_offsets_and_credits)

Wiki, "Carbon rationing, as a means of reducing CO<sub>2</sub> emissions to contain climate change, could take any of several forms.[1] One of them, personal carbon trading, is the generic term

for a number of proposed carbon emissions trading schemes under which emissions credits would be allocated to adult individuals on a (broadly) equal per capita basis, within national carbon budgets.[2] Individuals then surrender these credits when buying fuel or electricity. Individuals wanting or needing to emit at a level above that permitted by their initial allocation would be able to purchase additional credits in the personal carbon market from those using less, creating a profit for those individuals who emit at a level below that permitted by their initial allocation” [https://en.wikipedia.org/wiki/Personal\\_carbon\\_trading](https://en.wikipedia.org/wiki/Personal_carbon_trading)

(p18) Policy SP2: Climate change

"The council declared a climate emergency in 2019 and has a target of being carbon neutral by 2030"

When were public given evidence to support this and when did the public vote on this NSC decision?

(p60) Policy LP9 Bristol Airport

"More than two thirds of local authorities in the UK have declared their commitment to help delivering the Net Zero Transition through declaring a climate emergency." Therefore one third have not and are not therefore enforcing climate related Local Plan local policies on their residents, potentially to detrimental effect.

(p35) Policy SP10 Transport

"The approach to transport has a significant role to play in terms of delivering sustainable patterns of development consistent with the climate emergency ambition"

Bristol airport majority owned by Canadian Pension company, not local landowners or any related tenant farmers who would help protect the rural communities, local food production, etc. NSC policies do not clearly protect farm production land.

(p115) Policy DP15: Active and sustainable transport

"Road transport greenhouse gas emissions represent a fifth of total UK emissions, the biggest contributor being private vehicle trips. The transport sector is, at 49%, the largest single source of carbon emissions in North Somerset”, not from essential farming/food production or emissions from related animals.

“Current private vehicle trips and predicted growth represents a significant challenge in meeting national and local carbon reduction targets... One of the biggest challenges in reducing highway transport emissions is encouraging behaviour change” Where have these carbon reduction targets been communicated and agreed by residents? What happens if they are not met? What are the penalties?

(p121) Policy DP18: Travel plans

“support delivery of the North Somerset Active Travel Strategy and Climate Emergency Strategic Action Plan, encourage a greater proportion of trips by active travel modes, shape active travel neighbourhoods, reduce car travel and encourage sustainable travel, especially walking opportunities, for journeys less than one mile.” How much land is being used for NSC travel policies?



(p130) Policy DP22: Visitor attractions

"Proposals must meet climate change objectives and have no adverse impact on environmentally sensitive areas such as the Mendip Hills AONB and areas at risk of flooding and minimise the development of permanent structures and hardstandings." Food production and security should also be protected.

(p151) Policy DP34: Green infrastructure

"The North Somerset Climate Emergency Strategic Action Plan identifies the need to replenish carbon stores in the district. GI is relevant since it involves providing and maintaining areas of vegetation and trees... The GIS objectives include ... the creation of bigger, better, more and joined-up woodland, grassland and wetland habitats to achieve the ambitions of the West of England Nature Recovery Network"

"Where it is not possible, practical or desirable for green infrastructure provision or enhancement to be made on site, then adequate measures for off-site provision will be made, which may involve formal agreements and financial contributions" How much of this off-site provision will be on food production land? How will NSC assess and offset food requirements? "About a third of total methane emissions comes from wetlands.", so how does the creation of "bigger, better, more and joined-up wetland habitats" assist NSC's declared climate emergency ambitions/targets/etc.?

(p154) Policy DP35: Nature conservation

"Where a development requires off-site mitigation for greater horseshoe bats it is expected that developers will consider the use of the North Somerset Nature Parks strategic mitigation sites as a preferred means of achieving that mitigation. These Nature Parks are located in areas that have been modelled as providing the most important habitat and connectivity for bats and encompass a mixture of existing prime habitat for protection and areas that are suitable for enhancement". Does the modelling match real world outcomes? Will other districts also use NSC sites for offsetting their nature requirements (not only bats)? How will this effect farming, food production and security and its associated land?

(p159) Policy DP36: Biodiversity net gain (BNG)

"If it can be demonstrated that it is not possible to achieve the required BNG on site or that there are overriding benefits in making provision elsewhere, then off site mitigation may be acceptable. Where off-site mitigation is required, preference will normally be given to locations close to or well related to the development site" Has it been proven that developing on land (destroying nature in one area) and offsetting it by using an off-site mitigation actually protects or improves nature, rather than damaging it overall?

"Natural England produced a Biodiversity Metric 4.0 in July 2021 for most developments, and a Small Sites Metric (SSM) for use on small development sites in some circumstances (such as where no priority habitat, protected species, or off-site mitigation is involved). These (or any subsequent versions) provide the methodology for the BNG calculation. The calculation and BNG assessment must be set out in the biodiversity gain plan, including data and maps showing habitats affected and proposed."

"... this policy requires that developers should firstly aim to avoid, then minimise, then mitigate for, adverse impacts on biodiversity on site, before resorting to off-site mitigation... developers may be able to demonstrate that there are clear overriding benefits in providing supporting habitat for species away from the development (perhaps where species are sensitive to disturbance), in which case off-site mitigation may also be acceptable." Again,

how is offsetting being undertaken, how will it affect land associated with farming, food production and food security?

(p25) Policy SP6 Villages and rural areas

"The policy approach allows rural buildings to be converted to dwellings, subject to criteria, as it makes use of an existing resource." NSC definition "Rural building: All buildings outside of settlement boundaries other than permanent dwellings ... and buildings on existing or safeguarded employment sites, quarry or waste sites. Primarily this is likely to be agricultural building" How does NSC policy ensure that barns needed for feed, housing animals and machinery, etc. are not lost? "Where there are no existing suitable sites within settlement boundaries, a variety of non-residential proposals may be acceptable outside settlement boundaries." How will NSC policy ensure farming and variety of food production is not reduced? E.g. dairy cows being replaced by sheep.

(p27) Policy SP7: Green Belt

"The Green Belt is regarded as a multifunctional asset which not only carries out the traditional purposes set out nationally by maintaining openness and protecting land from inappropriate developments, it also ensures productive farmland ..." Bleadon, and other agricultural sites, is not in a green belt area and therefore associated farmland is not protected.

(p31)SP9 Employment

"Updated economic forecasts have been used to assess the requirements for employment land demand over the plan period (Employment Sites and Premises Requirements Evidence, Hardisty Jones Associates, 2023). This assessed economic forecasts across a range of sectors using data from Cambridge Econometrics and Oxford Economics. The assessment modelled the corresponding demand for employment land and premises across the range of business land typologies in North Somerset and across the West of England." 81.25ha over WSM, Wolverhill, Clevedon and Portishead. Do the models reflect real world requirements? How much of this is greenfield food production land?

(p69) Policy LP13: Preferred Area for mineral working – land at Hyatts Wood Farm, south of Stancombe Quarry

"The mineral working at Hyatts Wood Farm would necessitate demolition of the existing farm buildings" Have these farm buildings been used in recent years? If so where have they been 'offset' for ongoing food production purposes?

(p130) Policy DP22: Visitor attractions

"Changes to farming policy and support payments are likely to result in an increasing number of farmers and landowners looking to diversify their businesses and potentially include visitor accommodation, camping and glamping" Will current or increased levels of food production be guaranteed or reduced by these policies? How will food production and its variety be protected?

(p162) Policy DP37: Trees, woodlands and hedges

"Proposals for off-site provision is made where tree planting is not appropriate or practical on site" Food production land should not be used as tree off-site provision.

(p165) Policy DP38: Landscape

"Where some harm to the local landscape character is unavoidable, but a development is otherwise deemed beneficial, then positive mitigation measures should be secured by a landscape condition or planning agreement involving works on or off-site as necessary." Will "rolling valley farmland" continue to be productive in a range of food produce (arable, sheep, cows, pigs, etc) especially if landowners (not necessarily farmers) may be encouraged to diversify into solar panels (possibly with just sheep and no dairy produce) , wildflower meadows, trees/forestry, etc.?

DP31 Policy DP31: Mineral working exploration, extraction and processing.

Please note that in July 2019 (Min 324.11) Bleadon Parish Council agreed "to declare Bleadon parish to be "Frack-free". In September 2019 (Min 326.28) "Members noted that John Penrose's secretary had confirmed receipt of the Parish Council's letter regarding Bleadon being frack free". At the April 2023 annual residents meeting it was raised that there was, "Concern regarding Bleadon's Frack-free status in regard to any changes to NSC's new Local Plan" We would be opposed to any fracking in Bleadon.

(p208) Policy DP55 Agriculture and land based rural businesses

Definition of "Land based rural business development: A business which requires a rural location and is totally dependent on the use of the surrounding countryside for its business success such as horticultural, equestrian development, farming" (Glossary p294)

"Planning permission will be granted for agricultural or forestry development on existing and new holdings, or development for the purposes of farm based and other land-based rural businesses or diversification provided that:" Will NSC guarantee that there will be no adverse effect on food production (for people and animals), e.g. with the rise in planting trees?

"Farm diversification activities can contribute to the local economy by providing opportunities for employment or recreation for residents and visitors and by resulting in increased patronage for local shops and services. Such activities, where they come within planning control, will generally be supported provided that the character and appearance of the countryside are not harmed." Will food production be 'harmed', character and appearance over necessary function of food production?

(p209) Policy DP56: Equestrian development

"Permission for equestrian development will be permitted provided that either individually or cumulatively:..." a number of exceptions that do not include the protection of food production? Equestrian use removes land from food system category. How will food production be protected?

(p214) Policy DP58: Conversion or re-use of rural buildings

"Retailing will not be permitted, other than farm shops, small scale village stores, proposals under 200m<sup>2</sup> or proposals that are ancillary to the main use... If the building was completed within 10 years of the application being submitted for an agricultural or equestrian use the

applicant will need to demonstrate that the conversion of this building is essential for the long-term benefit of the associated agricultural/forestry/equestrian operation." How does this policy protect farmers who rent rural building for the housing of animals, feed, machinery, etc.? How will this use be 'offset'?

(p218) Policy DP60: Employment on green field land in the countryside

"Development proposals for new buildings for business use (Use Classes B2, B8 or E(g)) on previously undeveloped sites outside settlements will only be permitted where no suitable redevelopment sites or redundant rural buildings suitable for re-use are available and: The proposal relates to processing locally grown produce or other land based rural business; However, how does this policy prevent the other caveats from reducing food production?

(p221) Policy DP62: Visitor accommodation in the countryside including camping and caravanning

"The construction of new buildings for use as visitor accommodation outside the Green Belt and AONB will be permitted provided that: ...(conditions)

Proposals for new or extended touring and static caravan sites outside the Green Belt and AONB will be permitted provided that:... (conditions)

All visitor accommodation should: Not have a significant adverse effect on the living conditions of adjoining occupiers or adversely affect the operation of working farms;... (does this also include rotated land use for crops and animals?)

Proposals to use mobile homes on longstanding existing holiday parks for permanent residential accommodation will only be permitted if:

They are outside flood zone 3; and They are easily accessible in relation to existing facilities and services."

How does this policy prevent 'caravan creep' and protect food production?

NSC Strategic gaps Background Paper NOV23 (PDF)

"...., the relatively sensitive nature of the landscape, taking account of the topography and views, would suggest that if significant development was proposed there could well be a landscape reason for refusal." So how does this fit with potential solar panels and wind turbines over Bleadon fields? Does NSC's definition of development include business (caravan) and energy related development, or just housing?