



Have Your Say Before
It's Too Late

Protect Rural
Communities,
Farming, Food
Production & Security



NSC Local Plan 2039
Deadline 22 Jan 2024

Generational Risk to food production land in Bleadon and North Somerset

There appears to be a conflict of land use between current and/or potential food production land

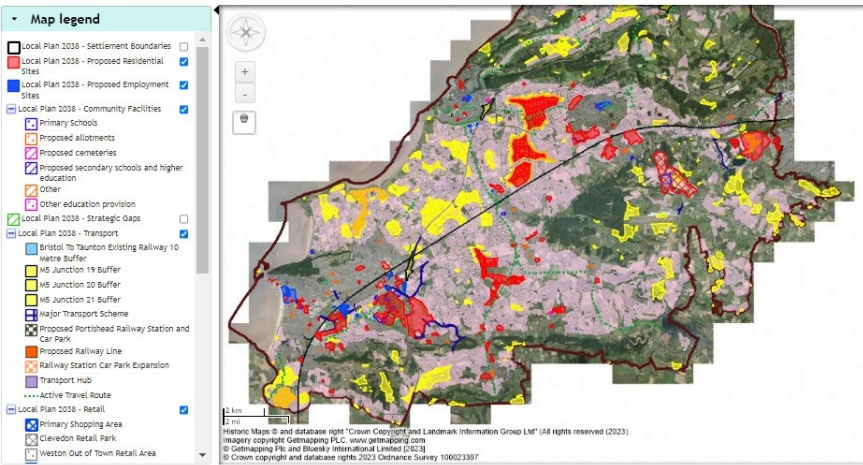
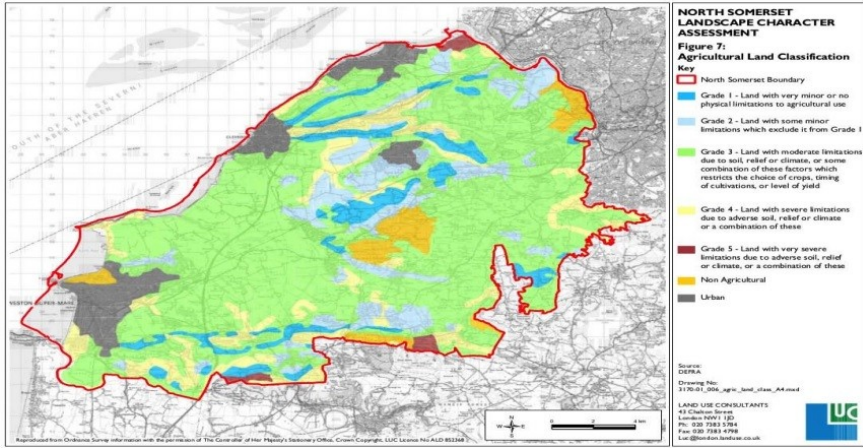
Grade 1 - Grade 1 – excellent quality agricultural land – dark blue

Grade 2 - Grade 2 – very good quality agricultural land – light blue

Grade 3 – green - good to moderate quality agricultural land - green

Grade 4 - Grade 4 – poor quality agricultural land - yellow

Grade 5 - Grade 5 – very poor quality agricultural land - brown

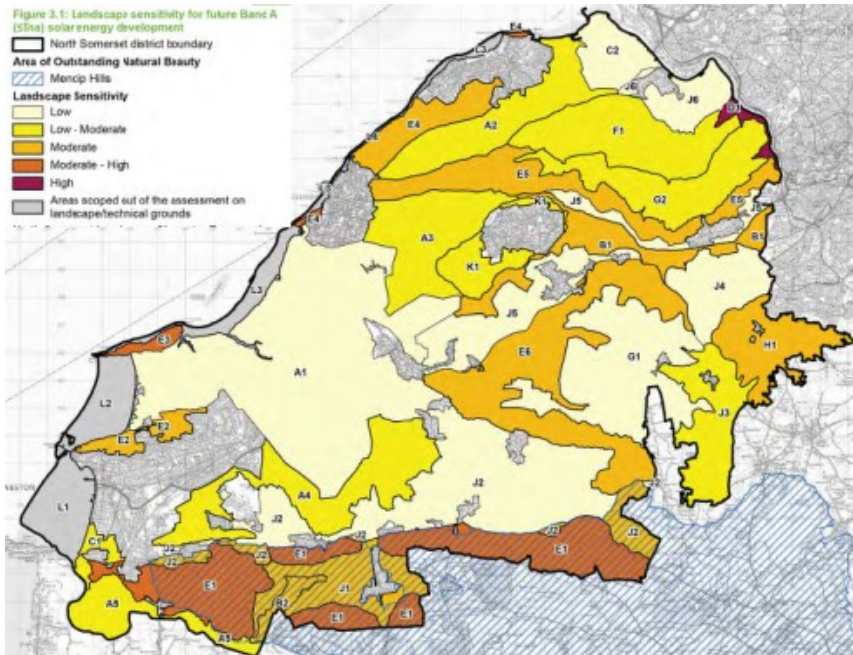


"Developments will be expected to provide 38.5% affordable housing on greenfield sites" and DP43: housing

However, the **WECA Carbon Offsetting Report** states:

"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."

Where is the farmland? Where will food be produced?



DP53 states, “Where development is proposed on sites of one hectare or greater on Grade 3a BMV agricultural land, development **will only be permitted** if:

- It is one of the **exceptions** listed under Grades 1 and 2;
- It is to be used for **renewable energy production** where the land could be returned to agriculture without a loss of quality; or
- Is for **affordable housing**; or
- The **sustainability benefits** of the proposal clearly outweigh the long-term loss of the best and most versatile agricultural land”

| LCA | Band A (up to 5ha) | BAND B (6-8ha) | BAND C (11-15ha) | BAND D (16-30ha) | BAND E (31-60ha) |
|---------------------------------------|--------------------|----------------|------------------|------------------|------------------|
| A1: Kingston Seymour and Puxton Moors | Low | Low-Moderate | Moderate | Moderate-High | High |
| A2: Clapton Moor | Low-Moderate | Moderate | Moderate-High | High | High |
| A3: Kenn and Tickenham Moors | Low-Moderate | Moderate | Moderate-High | High | High |
| A4: Locking and Banwell Moors | Low-Moderate | Moderate | High | High | High |
| A5: Bleadon Moor | Low-Moderate | Moderate | High | High | High |

(NB: **Not all farmers are landowners, a great deal are tenant farmers**)

The lower the sensitivity the more likely they may be built!



Official Statistics

United Kingdom Food Security Report 2021: Theme 2: UK Food Supply Sources

Updated 5 October 2023

The UK Food Security Report states that, ***"In meat, milk, and eggs, the UK produces roughly equivalent volume to what it consumes... over 50% of vegetables ... but only 16% of fruit."***

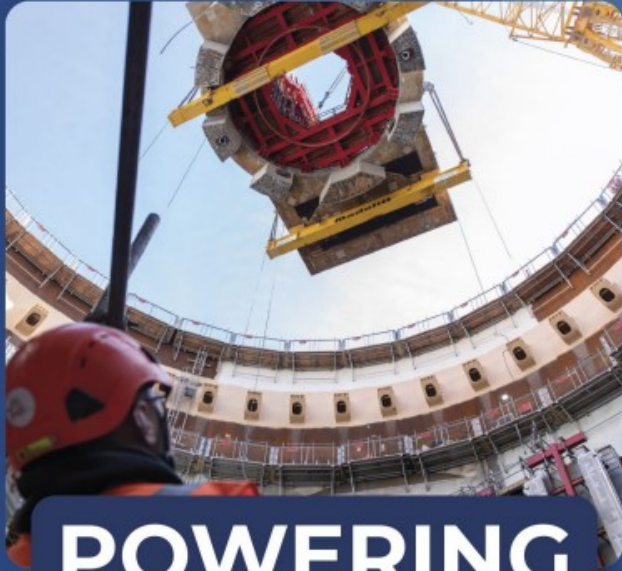
If the council's policies are supporting and encouraging farmland to be built on, or put out of action for 20-30 years (solar, Biodiveristy Net Gain (BNG), housing, etc), how will the Council ensure that current levels are maintained? Especially in light of current wars, the potential reduction in food imported and the resulting increase in food costs?

"Andersons estimates that the number of full-time UK farm businesses will drop from about 54,000 in 2020 to just 42,300 by 2030 – a fall of 11,700 or about 20%."

(Farmers Weekly 24JUN21 one of top farmers newspapers)



HM Government



POWERING UP BRITAIN

ENERGY SECURITY PLAN

March 2023

The UK Government Powering Up Britain Energy Security Plan 2023 (p38) states,

*“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.**”*

How is NSC ensuring ‘ongoing food production’ in and across all their policies?

Critical National Infrastructure

Last Updated 25 April 2023

The hillier upland regions are typically colder and wetter than the lowlands

Sheep are commonly farmed in hillier areas, particularly where cool summers and high rainfall are unsuitable for growing crops. 20% of England's sheep herd is in the South West and 20% in the North West.

Moist air brings wet weather to the west of the England

The warm, wet climate and gentler hills of the west of England make it suitable for **dairy farming**. 39% of England's dairy herd is farmed in the South West.



Although **food is one of the government's 13 Critical Infrastructure Sectors**, NSC's policies do not appear to reflect this status and is not consistent across policies, plans, strategies. (Although food is raised in NSC's Green Infrastructure Strategy).

We can survive without electricity but we can't survive without food, effecting life and well-being.

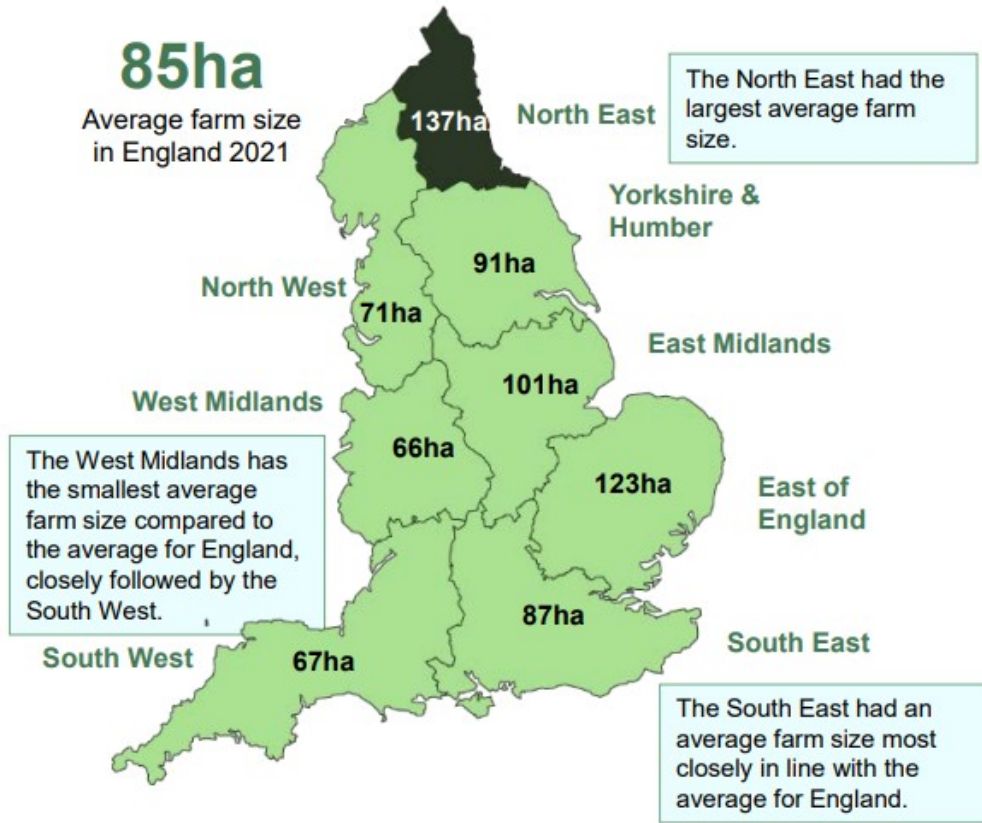
The main focus of the policies appear to be climate, environmental and nature related.

DEFRA indicates that **39% of England's dairy herd is farmed in the South West**, which will reduce if agricultural farms are closed, or switched to solar farms grazing sheep.

What will happen to current levels of milk, cheese, yoghurt, butter, etc. needed for infants, elderly and unwell people?

Average farm size in England and each Region 2019 in hectares (ha)

Dist



DEFRA states that the **South West also has one of the smallest average farm size**, so if small farms are encouraged to diversify away from farming, food production and security will be affected.

Removing agriculture from our communities may also significantly impact on the rural economy.

In 2020, the total income from farming in England was £3.6bn, with the South West contributing the most, at nearly a fifth.



North Somerset Local Plan 2039 Pre-submission Plan

Policy DP53:

Best and most versatile land

When assessing proposals for development on unallocated sites on agricultural land its agricultural land classification (ALC) will be taken into account. Where the land classification is uncertain or classified as grade 3 without further subdivision, a full survey will be required to establish its quality. The best and most versatile (BMV) land (grades 1, 2 and 3a) will be protected from significant, inappropriate and unsustainable proposals as follows:

Grade 1 and 2 BMV land

This finite resource will be safeguarded from development to ensure its long-term potential for food production and to protect the soil resource. Development will not be permitted unless it is for:

- Infrastructure or community uses that require that specific location; or
- Outdoor recreational use; or
- A limited temporary use where the land and soil could be returned to its former quality and plans for its reinstatement are secured; or
- Is necessary for the associated agriculture or forestry use.

Grade 3a BMV land

Where development is proposed on sites of one hectare or greater on Grade 3a BMV agricultural land, development will only be permitted if:

- It is one of the exceptions listed under Grades 1 and 2; or
- It is to be used for renewable energy production where the land could be returned to agriculture without a loss of quality; or
- Is for affordable housing; or
- The sustainability benefits of the proposal clearly outweigh the long-term loss of the best and most versatile agricultural land.

Where development for residential use is proposed both on allocated and unallocated sites layouts should, as part of an overall sustainable development, include proposals to preserve the better-quality land for gardens, allotments, community orchards or similar schemes which support local food production.

On all sites soil resources should be conserved and proposals for the reuse of soil and its protection during construction should be made clear in any planning application.

Local Plan DP53 states, “***The proportion of Grade 1 land in North Somerset is approximately 7% and 10% for Grade 2. 60% falls in Grade 3***”

“*The best and most versatile (BMV) land (grades 1, 2 and 3a) will be protected from significant, inappropriate and unsustainable proposals... **Development will not be permitted unless it is for...**” a variety of reasons.*

It seems that this important food growing land is not fully protected from development.

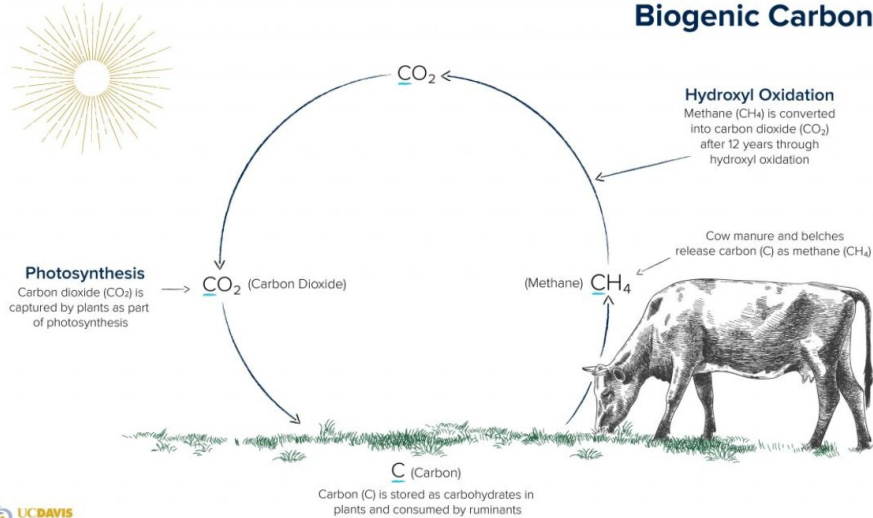
There appears to be no clear information as to what proportion of the Grade 3 land is 3b, and therefore what proportion of agricultural land and associated food production could be lost.



Figure 1. Share of permanent grasslands in the total utilized agricultural area in Europe in 2013 (source: Eurostat)



Biogenic Carbon Cycle



Farming can be good for the environment

“The potential of grasslands as a sink for carbon is enormous in Europe... Permanent grasslands cover 33% of the total utilized agricultural area Carbon can be naturally captured from the atmosphere through biological processes and stored in the soil for a long period of time.

Grasslands absorb carbon dioxide during growth of the grass plants and store it in the different tissues. The majority of the aboveground biomass will be eaten by grazing animals and the carbon will eventually return to the soil as manure or to the atmosphere via enteric fermentation”
(EIP-Agri Focus Group)

Where is the NSC research and policies on these natural approaches to carbon reduction? How is NSC encouraging farming to protect the environment instead of diversifying away from food production? Where is NSC’s critical infrastructure Food Production and Security Strategy and Action Plan?

NSC Corporate Action Plan Stated Land Use:

The NSCAction Plan references food but with no reference as to where and how that food will be produced? **If farmers and small farms are encouraged to diversify away from farming, food production & security will be negatively affected.** For example, NSC Action Plan proposes:

- “An increase in **new homes on council-owned land**, including affordable homes.
- An increase in identification of more areas of council land for **re-wilding/ management for biodiversity**.
- Increase the **delivery of renewable energy** on North Somerset land and buildings
- Land has been identified to secure the delivery of the required number of **dwelling**s within North Somerset between 2024-2039.
- Land has been identified for **business purposes** across North Somerset to meet needs and aspirations across a range of economic sectors over the plan period, to **contribute to sustainable patterns of development and commuting**, and to provide a range of local **employment** opportunities.
- Deliver the council’s development programme to provide quality **homes and jobs** on council owned land.
- An **increase in our carbon stores** through increased **tree planting and land management**.”

Where is NSC’s equivalent critical infrastructure Food Production and Security Strategy and Action Plan?

Policy DP55:

Agriculture and land based rural businesses

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:

- The proposals are necessary for and ancillary to the use of land for viable agricultural or land-based rural businesses purposes;
- The re-use of existing buildings on the holding is given priority over new buildings and only where no suitable buildings are available will new development be acceptable;
- In the case of diversification proposals, there is sufficient certainty of long term benefit to the farm business as an agricultural operation, that other rural businesses and the character and appearance of the countryside are not adversely affected; and
- The siting and design of the building respects its rural setting and does not harm the character of the landscape.

If the proposal involves a new or emerging business the application will need to be supported by evidence to demonstrate that the business will be capable of being economically sustained in the long term.

Diversification – where will the food come from?

Considering the number of policies supporting farmers and landowners diversifying (including to those to reach NSC energy targets), **how is the land going to be protected for food production and security?**

How are policies and funds (e.g. REPF) ensuring local food production from farm to local, rural and town retail outlets? How are they supporting the next generation of farmers, incl encouraging farming opportunities in school education, job fairs, etc.?

DP24: Town centres & **SP5:** Towns – retail - *“Traditional retail has declined and the plan needs to provide a framework to allow them to grow and diversify”*

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 - visitor accommodation, camping and glamping”* Also energy & BNG projects

DP54: Rural workers housing - *“Farmers are encouraged to diversify their activities and supplement their income from enterprises other than normal food production”*

DP55: Agriculture and land based rural businesses *“development for the purposes of farm based and other land-based rural businesses or diversification provided that: ...(variety of reasons) ... In the case of diversification proposals, there is **sufficient certainty of long term benefit to the farm business as an agricultural operation**, that other rural businesses and the character and appearance of the countryside are not adversely affected”* Not all farmers are landowners, how will other decisions affect their ability to farm (e.g. change of land use, barn conversion, etc.)

Settlement Boundary

See Review Background Paper for amendments to boundary and BPC previous response.

Local Plan, "*The policy approach allows rural buildings to be converted to dwellings, subject to criteria, as it makes use of an existing resource.*" **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? How does ensure multiple off-site mitigations/offsetting measures don't reduce land and food production? Why is there no 'Rural Strategy' in place?**

NSC Strategic gaps Background Paper

*"Bleadon/Weston super Mare A strategic gap is not appropriate. Having regard to SHLAA sites received and taking account of the generally relatively steeply sloping terrain between the settlements, it is considered that there is not likely to be development pressure leading towards potential coalescence of the settlements. Also, 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.**"*

How does this fit with potential solar panels over Bleadon fields? Does NSC's definition of 'development' (especially outside settlement boundaries) include business (caravan) and energy related development, or just housing? How do the policies deal with developmental creep?
(p25) Policy SP6 Villages and rural areas

Funding NSC Objectives

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." (28NOV23)
"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." **Who are these stakeholders that may be directing policy?** (NB: No borrowing for adult social services) (NSC Budget Info 06DEC23)

For example:

REPF - Grants to Rural Business **£106,229** in 2023/24 and **£159,342** in 2024/25

REPF - Grants to Rural Communities **£70,817** in 2023/24 and **£106,229** in 2024/25

Addition - Rural England Prosperity Fund - DP566 **£177K** in 2023/24 and **£266K** in 2024/25

How have rural communities accessed this funding? How has it been spent?

What has been allocated to Bleadon?

Compare to spending on 'green' rather than food initiatives?

Purchase of Land to support biodiversity net gain **£300K** (Borrowing)

(Farm?) Land for Yatton Secondary £2 million & Parklands Village **£384,527** (Grants & Contributions)

(Fram?) Land Release Fund - Churchill Avenue, Clevedon **£350K** & Uplands, Nailsea **£481,020** (Grants & Contributions)

Decarbonisation of heat (boilers) **£1.8 million** (Grants & Contributions) Decarbonisation at Campus **£1,197,000** (£886K Grants & Contributions + £311K Capital Receipts)

Vehicles and electric vehicle top-up **£12.4 million**, Eco Bus **£175K** and Low Emission Vehicle Provision **£45K**

(Borrowing) Purchase of (electric?) Vehicles **£548,597** (£351,332 Borrowing + **£123,266** Reserves & Revenue + **£74K** Capital Receipts) Office for Low Emission Vehicles (OLEV) **£212,508** (Grants & Contributions)

Addition - 4 x 4 vehicles - DP529 **£50K**



- 2.3 Achieve reasonable access to a wide range of community, educational, town centre and healthcare facilities.
- 2.4 Enhancing community cohesion and community facilities provision including cultural facilities.
- 2.5 Achieve healthy living opportunities – promoting good access to healthcare centres, open spaces, public rights of way, walking and cycling opportunities, and outdoor leisure activities.
- 3.1 Reduce carbon emissions by supporting appropriate decentralised renewable energy generation.
- 3.2 Minimise vulnerability to tidal and fluvial flooding, without increasing flood risk elsewhere. Also minimise surface water flood risk and harm to water quality and availability.
- 3.3 Reduce the need to travel by car to minimise environmental impacts of unsustainable forms of travel, including transport related carbon emissions and air pollution. Ensure good access to infrastructure that promotes travel by active modes (walking and cycling).
- 3.4 Minimise impact on, and where appropriate enhance, sensitive landscapes.
- 3.5 To conserve and enhance historic assets, heritage assets and their settings.

- 3.6 Protect and where possible enhance biodiversity, geodiversity and green infrastructure and allow its adaptation to climate change, particularly with respect to protected habitats and species.

A Sustainability Appraisal (SA) is prepared in parallel with the plan-making process and provides a mechanism through which sustainability effects can be described, analysed and compared. The process of undertaking a SA involves the identification of sustainability objectives which are used to measure and monitor the success of the plan. The SA objectives which are used to assess the local plan are:

- 1.1 Ensure a range of job opportunities are easily accessible without having to use a car.
- 1.2 Provides opportunities to improve economic wellbeing and reduce inequalities by providing good access to education and training opportunities.
- 1.3 Promote the optimal use of land which supports regeneration, maximise re-use of previously developed (brownfield) land and protects the rural economy.
- 1.4 Promote development which requires a deliverable level of high quality and sustainable infrastructure.
- 2.1 Boost delivery and meet the housing need identified within the plan period.
- 2.2 Deliver affordable or specialist housing where it is most needed to meet the needs of North Somerset's population.

Policy SPI:

Sustainable development

Ensure Sustainable Development Policies are Opportunities and not Threats

(e.g farming, food production & security are not protected like other NSC objectives e.g. climate, environment, species, BNG, housing, active travel, etc.)

1.3 Promote optimal use of land ... protect the rural economy.. deliver high quality and sustainable (**food**) infrastructure

3.5 Conserve & enhance historic & heritage assets and their settings (**Bleadon farming community for over 5K years**)

1.3 Provides opportunities to improve economic wellbeing and reduce inequalities by providing good access to education and training opportunities (provide local access to nutritional food, use **Rural Prosperity Fund**)

3.4 Minimise impact on, and where appropriate enhance, sensitive landscapes (e.g. DP53 **protect food grade land, solar panels on roofs not fields**)

3.6 Protect habitats and species – climate adaption – through farming, food production and security practices (**grazing lands as carbon sinks enteric fermentation**)

Your views matter – Please respond to the consultation

There will be no second chance once the Local Plan has been submitted and found 'sound' by the Secretary of State. All development **applications and appeals will be judged against the agreed Local Plan.**

North Somerset Council state,

*"At the close of this consultation period the council will summarise the **main issues raised by the representations and submit that summary to the Secretary of State.***

*If the representations raise matters which would suggest changes should be made to the Local Plan **before the document is submitted the council will consider the appropriate way to proceed.***

The examination is expected to take place in summer 2024. This will be followed by the report of the inspector.

The right to appear or be heard at the examination is limited to those persons who make representations seeking a change to the plan at this stage"

See Local Plan p2 & p10)

If the document is found to be 'sound' by the inspector it is expected that the Local Plan will be adopted by the council in December 2024 at the earliest.





The Local Plan 2039 Pre-Submission Document is **300 pages long and has 53 supporting documents**, each with 10s or 100s of pages. NSC has also referenced numerous Supplementary Planning Documents (SPD) and state that they will need to be updated in light of this consultation. **This presentation therefore focusses mainly on farming, food production and food security issues** (This presentation & related info will be available on Bleadon BOB) **How does NSC expect residents, businesses, farmer to respond to this size consultation, especially if they feel that have not been made aware of it, or been offered public meetings as were given in relation to Corporate Plan (9 meetings twice over)?**

It is **unfortunate that the timing** of this consultation, and the Corporate Strategy, was over the **Christmas period, closing on the 10th and 22nd January 2024**, respectively.

However, **I believe that your response to this issue at any level will benefit the health, well-being and economies of all our residents.**

Although **food is one of the government's 13 Critical Infrastructure Sectors**, NSC's policies do not appear to sufficiently reflect and protect this status.

The proposed Local Plan appears to **potentially allocate agricultural land to other NSC priorities** such as solar, nature recovery and biodiversity net gain projects, housing, highways, etc., without clearly stating where or how the food that was produced on that land will be 'offset', and continue to be produced.

The NSC Local Plan Guide states that, “***this consultation is a bit different to the previous three consultation stages in that the Government asks you to consider... whether the Local Plan policies are:***

Compliant - does the plan meet the legal requirements made under various statutes?

It appears that the Proposed Local Plan doesn't show sufficient “consideration for ongoing food production” to maintain food security?

Where is NSC's equivalent critical infrastructure Food Production and Security Strategy and Action Plan?

Sound - has the plan been positively prepared, is it justified, effective, and consistent with national policy?

Food production, Food Security & Farming is not fully addressed. Associated land is not sufficiently protected

Meet the Duty to Cooperate - has the council engaged and worked effectively with neighbouring authorities and statutory bodies? This means that specifically, we (NSC) are asking people to consider whether the policies and proposals in the Plan meet any of these tests when making a comment.” **How is farming protected across districts, e.g. sharing/renting of land, buildings, agricultural skills, equipment, etc.?**



| NSC and TOWN & PARISH LOCAL PLAN CORRESPONDENCE | |
|---|--|
| DATE with Link | TOPIC |
| 19DEC23 & Email | Request for support for farming to all NSC Town & Parish Councils |
| 06DEC23 | Presentation at NSC Executive Committee Regarding concerns over Farming, Food Production and Food Security |
| 30NOV23 incl Farm Video | NSC Transport, Climate and Communities Policy and Scrutiny Panel |
| 27NOV23 | Biodiversity Net Gain (BNG) SPD Consultation response |
| 17NOV23 | Draft Rural Strategy Considerations (still unpublished by NSC, draft due end of Jan 24) |
| APR22 | Previous BOB Local Plan presentation and April 2022 Consultation submissions |

This presentation, along related North Somerset Council and Town & Parish Correspondence, and further information and links to the Local Plan Consultation can be found at:

- the [Bleadon BOB BeInvolved blog](#) at

www.bleadon.org.uk/beinvolved.html?post_id=36848

- facebook [BleadonBOB](#)

- email jo@bleadon.org.uk



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North Somerset Local Plan 2039: Pre-submission Plan (Reg 19)

North Somerset Local Plan 2039: Pre-submission Plan

Consultations

Countryside

Policy DP53: Best and most versatile land

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Grade 1 and 2 BMV land

This finite resource will be safeguarded from development to ensure its long-term potential for food production and to protect the soil resource. Development will not be permitted unless it is for:

- Infrastructure or community uses that require that specific location; or

Please support your rural community and post comments on NSC's proposed Local Plan 2039

Deadline 22 January 2024

<https://n-somerset.inconsult.uk/NSLP2039PreSub>

Especially Section 5 Countryside policy DP53 (See all policies listed pages 3-7)