

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)

We believe that all North Somerset Council (NSC) plans and policies should clearly indicate how it will cater for agriculture, food production, food security and farming for all NSC residents not just those in rural communities, as they are all related. Food is a basic need for life, nutritious food for a healthy life. If NSC is permitting solar, wind, housing, nature recovery and Biodiversity Net Gain (BNG) projects, on agriculture fields in the countryside, and promoting grass/greenery on roofs in the towns and cities, where will the crops/food be grown? Where does NSC see the cows and cattle, for nutritional meat and dairy, or indeed any farmed animal, existing? Does NSC see rural communities existing in the future, and if so, how is it protecting their rural and farming status, especially Bleadon?

What takes priority in NSC plans – food security, energy security or environment/nature recovery? How do NSC plans and policies fit with government and West of England Combined Authority (WECA) plans and policies, and which take priority? We believe that any future Rural Strategy should discuss and hopefully address the issues and concerns raised in this document, especially for Bleadon. We believe consideration should also be given to the relationship between rural communities, as they often share farming resources, skills, labour, machinery, etc.

North Somerset Council's (NSC) Corporate Plan states, "Weston-super-Mare – our largest town is set to become the second biggest settlement in the West of England over the next decade." Cllr Mike Bell publicly confirmed that this would be second to Bristol! This is despite NSC reports that sea levels are rising, and that WSM is a coastal seaside town? [NSC Corporate Plan \(p7\)](#)

NSC's Emerging Local Plan states, "Strategic gaps are defined to help retain the separate identity, character and/or landscape setting of settlements." Bleadon has no buffer, or 'strategic gap', to stop development encroaching over Bleadon Hill or up from the Hospital. Has NSC considered the potential detrimental effect of WSM development expansion on Bleadon's rural infill village status, and associated farming community, local food production and security? [NSC Emerging Local Plan \(p52\)](#) (Also, indicated in [NSC Local Plan mapping](#))

From a [current Planning Application Statement](#), there is concern that "Bleadon is earmarked for reclassification from an Infill Village to a Category B Village in the emerging Local Plan". We believe that Bleadon's rural infill village status, and related farming community, should be protected in all NSC related plans and policies, especially as, "There is evidence of agricultural use of the land in the medieval period and probably from at least the Bronze Age" that was 3300 BCE – 1200 BCE ([Wiki](#)).

The UK government is encouraging farmers to [diversify away from farming](#), convert barns to residential use under [Class Q](#), or indeed close down altogether, which we believe negatively impacts on rural communities. It should be noted that not all farmers are landowners, and therefore the decision to stop farming is not always theirs, especially if their tenancy for land or related barns (to house animals, feed, machinery, birthing, etc.) are not renewed by the land/building owners. The shift towards public reliance on supermarkets is also having a negative effect on farming and rural communities. It has been reported that, "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" ([07 May 2023](#)) There is currently a [petition calling on retailers to provide a fairer deal](#) to the UK's struggling farmers, 'To Reform the Grocery Supply Code of Practice to better protect farmers' (ends 14 March 2024). A [farming Charity sees alarming increase in calls for help](#), Lincolnshire Rural Support Network says, "...many of the calls are related to money and debt. However, the area that has seen the biggest growth – a 229% increase – is stress and mental-health related concerns" (23 October 2023). What is NSC doing to protect Bleadon and related rural farming communities?

[NSC Local Plan DP53 \(p182\)](#) 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.? 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](#)). Has NSC calculated how much current agriculture land will be lost if NSC's Local Plan, and associated Biodiversity plan, allocate these grades 1-3b/4 land for other purposes, instead of conditioning the land and growing food locally? Has NSC taken into consideration land rotation between animals and food crops to ensure more natural soil maintenance and fertility? How will the land under solar panels be properly fertilised over years? How will invasive weeds be controlled and what will be the effect of any chemical used on the soil? Also, the effect on the sheep, and future human health, from eating it? Has NSC considered how shifting from cattle to sheep farming (under solar panels) effects local dairy production (milk, cheese, yoghurt, butter, buttermilk related spreads, etc.)? It has also been said that it is very cost prohibitive to obtain insurance for grazing solar panel compounds. How do bats and birds hunt for food over this land, as solar panels will obstruct swooping?

[p183](#) states, "Where residential use is permitted proposals should be put in place to encourage local food growing." We assume that this broadly relates to small scale and allotment style growing? As anyone who has tried back garden farming, it is very hard to grow one families needs. So, how is NSC ensuring that existing rural community larger scale farming is maintained and/or increased to fully support local community food and nutritional needs?

There seems to be conflict between various NSC GIS data mapping layers that may have a detrimental impact on Bleadon as a rural farming community and infill village status. For example: [Food Growing in the Green Infrastructure \(GI\) policy mapping](#) (although this map indicates Bleadon to be 'non-irrigated arable' land, whilst looking in the direction of the Bleadon Levels, pastoral farming can be seen too, where did this information originate? Are there associated mapping layers for pastoral land/farming?)

vs NSC [Draft Local Plan solar, wind, development mapping](#), that covers the food map area for Bleadon vs [Govt & DEFRA mapping regarding land use and grades](#) used for Local Plan mapping also seems to conflict, for example: [DEFRA Post 1988 Agricultural Land Classification](#) vs [Natural England Land Agricultural Classifications](#) vs [Dudley Stamp Land Use Inventory](#). There is also a '[Likelihood of Best and Most Versatile Agricultural Land](#)', how much is this computer modelled vs real world analysis and current usage? Clarification as to which datasets are being used, and the priorities between them, would be welcome.

There is concern that whilst layering data for inclusion/exclusion of policy making, Bleadon may be misinterpreted e.g. Bleadon is not marked for [rewilding](#) (understandably) but may potentially be considered more urban than it actually is, when auto-analysing GIS data layers. We believe Bleadon parish is considered rural because of its long-standing generational farming, along with its 20 Public Rights of Way, part located in the Mendip Hills Area of Outstanding Natural Beauty, 7 SNCIs, 4 wildlife sites, 4 SSSIs, 2 RIGS, a Natural England Ancient Woodland, several TPOs, Environment Agency (Water) Source Protection Area and a Bat SAC. For these and more reasons, We believe Bleadon should be protected as a rural community and maintain its infill village status.

There appears to be little to no consistent reference to farming's role in food production, food security or agriculture across the NSC policies such as the Corporate, Local, Biodiversity plans/policies, except it seems in the [GI policy](#). I believe NSC policies and plans should give more priority to food production via farming and food security e.g. in relation to government information, such as the [Critical National Infrastructure](#), which lists 'Food' as one of the 13 sectors. Also, I believe that these plans should better recognise and clearly indicate NSC's priority in balancing energy (solar, wind, etc.) and nature recovery (including Biodiversity Net Gain) projects with essential food production and its security. Which does take priority for NSC, especially in relation to the future of rural communities, farming and agriculture?

There appears to be no mention of 'food security' in [NSC's Biodiversity SPD Consultation](#), only that, "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" (Para 8.2.3 p35) It has been said that once agricultural land has been removed from the food 'chain', it will be unlikely that it will return. During the 30 years that this land is out of action the associated farming community will more than likely lose local generational skills, abattoirs, animals sales markets, training colleges, etc., making it increasing hard if not impossible to recover from. This would also negatively impact on related local rural food markets, butchers, farm shops, etc., potentially closing down the core local services in rural communities, and increasing reliance on supermarkets. How is NSC ensuring that this cascade problem will not arise within North Somerset and particularly Bleadon? If each unitary/district does not take food production and security sufficiently into account in its plans, it can be seen how quickly food security problems could escalate not only locally or regionally but nationally.

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." (05 Oct 2023). If NSC policies are supporting and encouraging historical farmland fields to be put out of action for 20-30 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 this level of security, especially in light of current wars and potential food importation concerns?

[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) [NSC DP53 Best & Most versatile land \(p182\)](#) states, "The proportion of [Grade 1](#) land in North Somerset is approximately 7% and 10% for Grade 2. 60% falls in Grade 3." How is farming and food protection in these categories being protected by NSC plans and policies, including Grade 3b?

[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" [Defra, United Kingdom Food Security Report 2021: Theme 3: [Food Supply Chain Resilience](#), updated 22 December 2021]" How is NSC addressing food security in its Local Plan and other plans and policies? How is NSC protecting rural communities from being overwhelmed with town and city development expansion, energy projects, nature recovery and BNG projects, etc., that may threaten food production?

The effect of Biodiversity Net Gain credits bought by town and city developers also needs to be considered in relation to the rural landscape and local farming, e.g. Bristol, potentially using rural land to achieve its mandated 10% or more BNG, potentially out-competing local rural offsetting, and threatening future farming/agricultural/food production and security. Similarly, large companies 'bidding' higher and out-competing smaller local companies for BNG credits. How is NSC managing this process to ensure that highly populated areas, either within North Somerset or outside the area, offsetting does not detrimentally impact on local rural food production and security?

[NSC Local Plan mapping proposes swathes of solar and wind development throughout Bleadon and North Somerset](#). If the proposed Local Plan goes through, will the whole of this area highlighted in pink potentially be solar? "Local Plans, prepared by a local planning authority in consultation with its community, set out a vision and a framework for the future development of an area. [Once in place](#), Local Plans become part of the statutory development plan. The statutory development plan for the area is the starting point for determining local planning applications." Does this mean that residents are less able/unable to overturn any solar, wind, housing, etc. planning application, as potentially no appeal will be held as it has already been agreed in principle in NSC's Local Plan?

There are currently [two mega-solar projects at Langford, covering around 166ha \(410 acres\)](#), one of which is said to be built on [Grade 3b and 4 agriculture land](#). We believe relating these proposals to the Local Plan helps understand the effect of solar panels on rural communities, and how Biodiversity Net Gain appears to be applied in relation to planted borders and sheep grazing. Also, the proposed [Long Ashton Office Campus over 90 acres of Green Belt land](#). Solar panels have been proposed on agriculture land on the Bleadon Levels on the [Wessex site](#).

It should also be noted that, as at 31 Mar 2022, [NSC's smallholdings land held, for farming purposes, has now reduced to 166ha \(410 acres\)](#), a similar area as the Langford solar developments combined. How are tenant and/or new farmers going to work and produce food for our communities if there is no land for them to rent/lease?

A recent article stated, "Gloucestershire County at risk of becoming [Solarshire](#) due to number of photovoltaic panels... The Forest of Dean District Council has been approving plans for solar farms on a case by case basis. But there has been an accumulation of planning applications to develop such sites on fields either side of the B4215 road between Newent and Highnam. And if they are all approved it could create a corridor of one million solar panels...During the meeting, the council agreed to prepare a draft Local Plan based on their new strategy for future approval and consultation in 2024." (25 Oct 2023) We believe any such NSC plan should also address the environmental and [human cost](#) of mining the materials, potential [slave](#) and [child](#) labour effects, any on-site run-off land pollution, panel disposal, clean up of the land, [battery](#) storage, etc. CPRE have also highlighted some, ['Problems with Solar Farms'](#).

If NSC see farming significantly reduced, or possibly eliminated, in the future, what does it propose residents eat? Is it assuming that other countries can export food to the UK, at a high cost (assuming that they have the same animal care standards, pharmaceutical use and GM standards as the UK)? Will residents be forced to become vegans or vegetarians, remembering that dairy generally comes from cows? Will more highly processed and 'fake' products need to be imported at high cost with associated health, environmental CO2 and water negative impacts (e.g. use of soya, almond, nuts etc.)? Is NSC supporting the government's plan to introduce insects into the public's diet? Norfolk County Council responded to the [government's 'Consultation on Transitional Arrangements for Edible Insects in Great Britain'](#), what was NSC's view/response on behalf of residents (03 Oct 23)? What is NSC's view on supporting and/or promoting artificial meat with it's chemically processed ingredients, artificial growing methods, also 3D printing 'fake' meat (e.g. [Israel](#))? What will be the health impacts of these untested approaches to food consumption, and potential resulting allergies and adverse reactions?

As can be seen from above, there is a lot of complexity to consider before reducing or removing over 5,000 years of agriculture in Bleadon and related communities. Please can North Somerset Council ensure that it has considered these issues [before](#) implementing wide-reaching, potentially irreversible and harmful, plans and policies, affecting current and future generations' food, health and community life. (bob@bleadon.org.uk 17NOV23)

List of Links Referenced Above

North Somerset Council Links

NSC Rural Strategy - as yet unpublished

NSC Green Infrastructure Strategy - <https://www.bleadon.org.uk/media/other/24400/GI-NSC-30249NSGISStrategyACCFINAL.pdf>

NSC Corporate Plan - <https://n-somerset.inconsult.uk/corporateplan/consultationHome>

NSC Draft/Emerging Local Plan - <https://n-somerset.moderngov.co.uk/documents/s5151/09.1%20Local%20Plan%20Reg%2019%20Executive%20Committee%20October%202023.pdf>

NSC Draft Biodiversity SPD - <https://n-somerset.inconsult.uk/biodiversityspd>

Current Planning Application Statement -

<https://planning.n-somerset.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=S2ZMNVLPM2300>

Maps/images

NSC Local Plan interactive Mapping - <https://n-somerset.gov.uk/my-services/planning-building-control/planning-policy/our-local-plan/local-plan-2038/draft-plan-2021/preferred-options-local-plan-policies-map-march-2022>

NSC Rewilding interactive mapping - <https://map.n-somerset.gov.uk/Rewilding.html>

NSC food growing in the Green Infrastructure (GI) policy mapping - <https://www.bleadon.org.uk/media/images/user-images/24400/NSCFoodGrowingMappingFigure16.jpg>

NSC Draft Local Plan solar, wind, development mapping, covering Bleadon food growing area - <https://www.bleadon.org.uk/media/images/user-images/24400/NSCLocalPlanlayersimage26OCT23.jpg>

Govt & DEFRA mapping regarding land use and grades for Local Plan mapping -

<https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land#ipas-carry-out-alc-assessments-to-support-your-planning-decisions>

DEFRA Post 1988 Agricultural Land Classification -

<https://www.bleadon.org.uk/media/images/user-images/24400/DEFRAMAGIC123aImage260923v3.jpg>

Natural England Land Agricultural Classifications -

<https://www.bleadon.org.uk/media/images/user-images/24400/BleadonLandClassificationsfromNaturalEngland.jpg>

Dudley Stamp Land Use Inventory -

<https://www.bleadon.org.uk/media/images/user-images/24400/DEFRADudleyStampLandUseimageBleadon2.jpg>

Likelihood of Best and Most Versatile Agricultural Land -

<https://publications.naturalengland.org.uk/category/5954148537204736>

Solar Sites & Information

Two mega-solar projects at Langford covering around 166ha (410 acres) -

https://www.bleadon.org.uk/beinvolved.html?post_id=36723#LANGFORD

Langford Yanel Mega-Solar development on grades 3b and 4 agriculture land [Langford Mega-Solar Development on grades 3b and 4 agriculture land](https://www.baywa-re.co.uk/en/solar/yanel-solar-farm#about-the-project) - <https://www.baywa-re.co.uk/en/solar/yanel-solar-farm#about-the-project>

Long Ashton office campus over 90 acres of Green Belt land - <https://www.bristolpost.co.uk/news/bristol-news/plan-state-art-office-campus-8905806>

Wessex solar proposal in Bleadon - <https://planning.n-somerset.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=RZ7Z10LP03F00>

Gloucestershire 1 million solar panel corridor - <https://www.visit-gloucestershire.co.uk/county-at-risk-of-becoming-solarshire-due-to-number-of-photovoltaic-panels-planned/>

31 Mar 2022, NSC smallholdings land, held for farming purposes, has now reduced to 166ha (410 acres) - <https://www.gov.uk/government/publications/72nd-annual-report-to-parliament-on-smallholdings-in-england-1-april-2021-to-31-march-2022/72nd-annual-report-to-parliament-on-smallholdings-in-england-1-april-2021-to-31-march-2022#tables>

CPRE – The Problems with Solar Farms - <https://www.cpreherts.org.uk/wp-content/uploads/sites/30/2021/10/The-Problem-with-Solar-Farms.pdf>

Government Links

Government Diversification Guidance - How to apply for a lump sum payment to leave or retire from farming <https://www.gov.uk/government/publications/apply-for-a-lump-sum-payment-to-leave-or-retire-from-farming/how-to-apply-for-a-lump-sum-payment-to-leave-or-retire-from-farming>

Govt Legislation Class Q - <https://www.legislation.gov.uk/ukxi/2015/596/schedule/2/part/3/crossheading/class-q-agricultural-buildings-to-dwellinghouses/made>

Govt Land Classification usage Grades 1-5 (3a and 3b) - <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land#about-alc-grades>

Govt Critical National Infrastructure - <https://www.npsa.gov.uk/critical-national-infrastructure-0>

UK Food Security Report 2021: Theme 2: UK Food Supply Sources - <https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2021/united-kingdom-food-security-report-2021-theme-2-uk-food-supply-sources>

UK Govt Powering Up Britain Energy Security Plan - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1148252/powering-up-britain-energy-security-plan.pdf

UK Govt Good Security Seventy Report (28 July 2023 - footnote 11) - <https://publications.parliament.uk/pa/cm5803/cmselect/cmenvfru/622/report.html#footnote-242>

DEFRA UK Food Security Report 2021: Theme 3: Food Supply Chain Resilience - <https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2021/united-kingdom-food-security-report-2021-theme-3-food-supply-chain-resilience>

Local Plans once in place - https://assets.publishing.service.gov.uk/media/5a749f88ed915d0e8bf19cf8/Local_Development_Documents_policy_factsheet.pdf

Govt Consultation on Transitional Arrangements for Edible Insects in Great Britain - <https://www.food.gov.uk/news-alerts/consultations/consultation-on-transitional-arrangements-for-edible-insects-in-great-britain>

Govt petition calling on retailers to provide a fairer deal for farmers - <https://petition.parliament.uk/petitions/643216>

Other Links and Articles

British Farming Crisis - <https://www.thegrocer.co.uk/sourcing/is-british-farming-facing-an-existential-crisis/678965.article>

Farming charity sees alarming increase in calls for help - <https://rsnonline.org.uk/farming-charity-sees-alarming-increase-in-calls-for-help>

Wiki - <https://en.wikipedia.org/wiki/Bleadon>

Amnesty International Human cost of mining the materials - <https://www.amnesty.org/en/documents/afr62/3183/2016/en/>

Guardian - potential slave labour - <https://www.theguardian.com/global-development/2021/nov/08/cobalt-drc-miners-toil-for-30p-an-hour-to-fuel-electric-cars>

Guardian potential for child labour - <https://www.theguardian.com/environment/2021/jan/03/child-labour-toxic-leaks-the-price-we-could-pay-for-a-greener-future>

Minerals in solar panels and solar batteries - <https://palmetto.com/learning-center/blog/minerals-in-solar-panels-and-solar-batteries>