

## LOCAL PLAN CONSULTATION RESPONSE 12 December 2025

This proposed local plan consultation, nor the current Local Plan, sufficiently takes into account farming, food production or security in its policies or strategies. Nor does it refer to its Rural Strategy in the supporting documents. This is putting the local, regional and national farming, food production and food security at risk.

To be sound a Local Plan should be **positively prepared** (seeks to meet the area's objectively assessed needs), **justified** (founded on a robust and credible evidence base and be the most appropriate strategy when considered against the reasonable alternatives), **effective** (deliverable, flexible and able to be monitored) and consistent with national policy. This plan is **NOT SOUND** as it has not been positively prepared, not proven justified, nor proven to be effective in relation to local, regional and national farming, food production and security needs. It has not shown the assessed or quantified effect of food producing land lost to past, committed or proposed development, nor does it put limits to future development on land that is able to produce food. This will put local, regional and national production at risk, as well as increasing the future risk of food shortages.

Large city councils are stating that they cannot fulfil their government targets, due to a lack of land (e.g. housing). North Somerset Council should also be able to declare that it also cannot fulfil its government targets because of a lack of land. The land within North Somerset is being used for farming and food production, supporting local, national and regional food security. More people will need more food, losing productive farmland of all grades will increase the current farming and food emergency.

Some key issues and concerns:

1. Westminster Hall Debate: Impact of land use change on food security:
  - a. ***WE ARE, QUITE SIMPLY, IN A FOOD AND FARMING EMERGENCY... THAT IS WHAT LOCAL PLANS ARE FOR.***
2. Non-effective joint working between strategic policy-making authorities and relevant bodies
3. CPRE has stated that there is enough brownfield land to build 1.4m homes in England
4. Food is one of the Government's Critical National Infrastructure Sectors (Housing is not)
5. The trend of increasing local food thefts is a growing concern for the food industry - at 20% - UK shoplifting at 20-year high as losses top £2bn. People are poor and hungry already.
6. Threats to the UK food supply chain resulting from illicit activity outside of the UK, alongside that criminality perpetrated domestically.
7. Not all farmers own land - Tenant Farmers and land
8. NPPF and Food production (including NSC selling publicly owned land assets)
  - a. 15. Conserving and enhancing the natural environment
  - b. 11. Making effective use of land
9. Proposed Local Plan Policies
  - a. Poorly protected food production land under DP53 (Best and most versatile land) vs better protected DP52 (Protection of open space and recreation)
  - b. DP8 – (non) Efficient use of land
  - c. LP6 Strategic Gaps - are defined to help retain the separate identity, character and/or landscape setting of settlements
10. Summary
  - a. This proposed Local Plan is not sound. Despite being its power, the current proposed Local Plan does not address the critical, life affecting, issues of farming, food production or security, It does not protect the future physical, emotional or economic health and wellbeing of our residents and communities at local, regional or national levels.
  - b. Create protective farming, food production and food security policies. Ensure any decision or policy has been considered in relation to farming, food production and food security. Create strategic gaps around all urban areas to protect rural agriculture/ farming communities.

## **1. Westminster Hall Debate: Impact of land use change on food security:**

The lack of food producing land protection afforded by NSC's proposed Local Plan is of major concern considering the Westminster Hall Debate: Impact of land use change on food security 18 Nov 2025 at <https://www.parliamentlive.tv/Event/Index/0142c14c-8d9e-4435-9f73-cadad1e0ec33> and Hansard Transcript at <https://hansard.parliament.uk/commons/2025-11-18/debates/40EF0BDF-9D30-480B-8B54-AB3731CAB688/LandUseChangeFoodSecurity>

[Robbie Moore MP](#) Shadow Minister (Environment, Food and Rural Affairs) said, "As a result of the choices that the Government have made over the last 16 or so months, **WE ARE, QUITE SIMPLY, IN A FOOD AND FARMING EMERGENCY**". In response to reaching housing targets, and the resulting effect on agricultural land [Dame Angela Eagle Minister of State for Food Security and Rural Affairs](#) said, "It is not up to me to take decisions about local planning issues of that kind. **THAT IS WHAT LOCAL PLANS ARE FOR.**" Yet this proposed Local Plan exposes all land including grades 1-3 to potential development with no quantified relation to its effect on local food production'; there is no limiting factor to stop ALL farmland being developed.

From the Westminster debate, " the Government have acknowledged that food security and national security are linked, but they have not acted with seriousness or urgency to get an action plan in place. We cannot hope to secure our food supply without a plan that links food production, affordability, nutrition, public procurement, fairness in the marketplace, farming, nature and trade." North Somerset councillors were elected to represent and protect residents.

NSC clearly put climate and nature above food security, essential to life. NSC has called both a climate and nature emergency but will not recognise that there is a farming food security emergency as declared by the Shadow Minister (Environment, Food and Rural Affairs) in the 18 November Westminster debate.

On 6<sup>th</sup> December 2023 I raised concerns around the cost-of-living crisis and food poverty, and national and local food production protection. I asked that farming, food production and food security was addressed across all North Somerset Council's policies

<https://n-somerset.moderngov.co.uk/ieListDocuments.aspx?CId=152&MId=1068> At subsequent meeting two Executive members said they'd raise the possibility of a Supplementary Planning Document with council but as far as I'm aware this didn't happen. On 16 Sept 2025 I again raised the issues and requested that Food Security be added to the environmental and climate change implications and considerations for decisions and reports – no clear response.

<https://n-somerset.moderngov.co.uk/ieListDocuments.aspx?CId=169&MId=1281> At the 18 November 2025 Westminster debate one MP said, "The NFU is absolutely right to call for food security impact assessments on all relevant policies. We have impact tests for almost everything else, and it is extraordinary that food security is not one of them..." By the time the government start properly assessing the change of land use impacts the NSC Local Plan will have assigned food producing land to non-food producing purposes. <https://hansard.parliament.uk/commons/2025-11-18/debates/40EF0BDF-9D30-480B-8B54-AB3731CAB688/LandUseChangeFoodSecurity> Farming, food production and food security is not being protected at any level put residents at risk of food shortages, hunger and poverty.

On 17 July 2024 a resident addressed Cabinet, as NSC has called a climate and nature emergency, and food production relies on both of these, a food security emergency should be called and the land protected <https://n-somerset.moderngov.co.uk/ieListDocuments.aspx?CId=152&MId=1163> – this still has not been called by NSC despite a clear need for it at local, regional and national level.

This proposed Local Plan does little to nothing to protect our food production and security, that is vital to life. It is conceivable that by the time the government put an action plan in place North Somerset councillors will have approved a Local Plan that assigns the agricultural land to non-food-production purposes for the next 15 years and significantly damaged local, regional and national food security.

## **2. Non- Effective and on-going joint working between strategic policy-making authorities and relevant bodies**

The current NPPF para 26 states, *“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.”* Through conversations, emails, addresses to Cabinet and Full Council NSC has not addressed farming, food production or its security at a local level. I therefore assume that they are not addressing it in any strategic area basis in a joint working relationship and that existing and future food infrastructure has not been discussed. See 4. below, where food and its security is one of the government’s 13 Critical Infrastructure Sectors, housing is not, food infrastructure has not been effectively addressed in this Local Plan.

## **3. CPRE - enough brownfield land to build 1.4m homes in England**

[CPRE 24 Sept 25](#) *“Our new research reveals that there is enough brownfield land to build 1.4m homes in England, and more than half of these sites already have planning permission (either outline permission or better), meaning they could be built on rapidly”* ([report](#)). So limited farmland doesn't need to be built on.

## **4. Food is one of the Government’s Critical National Infrastructure Sectors (Housing is not)**

*“Critical National Infrastructure (CNI) are those critical elements of infrastructure whose loss or compromise could severely impact the delivery of essential services or have significant impact on national security, national defence, or the functioning of the state.”* Without food, as the food banks run dry, people will resort to theft, as is already escalating currently in local shops. NSC’s Local plan doesn’t make reference or quantification of food production effects, or the resulting community effects, both individual and business. The Local Plan and land use related policies don’t protect fields, farmers or community in regards to food production supply and puts us all at health and financial risk. Various extracts from MPs at the Westminster food security debate illustrate this, *“the former director general of MI5, has said, food security is national security. If we cannot feed ourselves, we are vulnerable—economically, strategically and in the choices available to us as a country... if we lose our food security, we lose our national security and become vulnerable to volatile global markets and reliant on more foreign inputs...”* <https://www.npsa.gov.uk/about-npsa/critical-national-infrastructure>

*“The UK government's official definition of CNI is: 'Those critical elements of infrastructure (namely assets, facilities, systems, networks or processes and the essential workers that operate and facilitate them), the loss or compromise of which could result in: a) Major detrimental impact on the availability, integrity or delivery of essential services - including those services whose integrity, if compromised, could result in significant loss of life or casualties - taking into account significant economic or social impacts; and/or b) Significant impact on national security, national defence, or the functioning of the state.’”* **Food is a CNI (housing is not), it is essential to life, the shortage or loss of which will result ‘significant loss of life or casualties’, especially the vulnerable such as the young and elderly.**

As far as can be seen, food security has not been quantified or effectively discussed between *“strategic policy-making authorities and relevant bodies”*. For example, in a recent email NSC state, *“National security risks, like food security, are managed through government policy rather than at local authority level.”*

## **5. The trend of increasing local food thefts is a growing concern for the food industry - at 20%. People are poor and hungry already**

Government Official Statistics from 2 years ago - Crime against businesses: findings from the 2023 Commercial Victimization Survey “9.2 Theft - **For premises that experienced theft, burglary, or robbery, the 5 most common types of items stolen were: food or groceries (20%), unpaid services (13%), clothing (11%), IT or electrical equipment (9%) and alcohol (8%).** Over two-thirds (69%) of victims of theft said it had a moderate or severe financial impact.” Theft of food is the top reason for theft. If food runs short and becomes even more unaffordable, thefts will continue to increase. I can find no report for 2024/25, although I’m aware of local food shops suffering increased thefts without proper police support. <https://www.gov.uk/government/statistics/crime-against-businesses-findings-from-the-2023-commercial-victimisation-survey/crime-against-businesses-findings-from-the-2023-commercial-victimisation-survey>

The government Food Standards Agency states, “**The trend of increasing local food thefts is a growing concern for the food industry.** The 2024 Food Crime Strategic Assessment by the Food Standard Agency and Food Standards Scotland highlights that while most food in the UK is safe and authentic, the cost of food crime to the UK totals between £410m and £1.96bn per year. This includes a significant rise in food supply chain thefts, with food and beverages accounting for nearly a third of all incidents last year. The increase in thefts is attributed to various factors, including geopolitical uncertainty, inflationary pressures, and improved surveillance and reporting methods.” This proposed Local Plan doesn’t appear to take into consideration the loss of land, farming, farmers and UK food production; or its effects on residents, communities or high street businesses.

<https://www.food.gov.uk/sites/default/files/media/document/FSA-Food%20Crime%20Strategy%202024.pdf>

11 August 2025 UK shoplifting at 20-year high as losses top £2bn

<https://www.grocerygazette.co.uk/2025/08/11/shoplifting-20-year-high-losses-top-2bn/>

## **6. Threats to the UK food supply chain resulting from illicit activity outside of the UK, alongside that criminality perpetrated domestically**

“... **threats to the UK food supply chain resulting from illicit activity outside of the UK, alongside that criminality perpetrated domestically**... we observe four themes – types of food crime linked to certain commodities – which are most prominent within our intelligence picture: • Misrepresentation of red meat and poultry, with regards to status, origin or durability date • Waste diversion, including links to Animal By-Products (ABP) handling within red meat and poultry supply chains • The servicing of consumer demand for culturally preferred products through the slaughter, unlawful processing or importation of lamb and pork • Authenticity challenges in the supply chains of commodities posing notable or persistent fraud risks to UK consumers arising from upstream, overseas adulteration and misrepresentation... Theft and associated activities can sit in various positions in the food supply chain where high value raw materials or finished products fit for immediate resale are stolen in transit, via European Distribution Fraud... Any expansion of demand for culturally preferred food products not traditionally consumed (or legally produced) in the UK will be highly likely to lead to the persistence, or growth, of non-conventional and illicit supply routes... Reporting continues to highlight the link between livestock theft and unlawful processing, with in-field slaughter reported in all three main red meat types. In situ dumping of animal by-products (ABP) presents environmental and health risks.” Again, lack of any NSC farming, food production and security policies will continue to affect access to quality food locally, regionally and nationally. <https://www.food.gov.uk/sites/default/files/media/document/FSA-Food%20Crime%20Strategy%202024.pdf> 28 February 2025 article “79% spike in recorded food supply chain thefts” <https://www.bsigroup.com/en-GB/insights-and-media/media-centre/press-releases/2025/february/79-percent-spike-in-recorded-food-supply-chain-thefts/> .” This proposed Local Plan doesn’t appear to take into consideration the loss of land, farming, farmers and UK food production; or its effects on the supply chain.

## **7. Not all farmers own land - Tenant Farmers and land**

Not all farmers own land, some are tenant farmers renting land to produce our food. On 26<sup>th</sup> September 2025 the government's new Tenant Farming Commissioner states, "***In England, 45% of holdings are either wholly tenanted or mixed tenure, and a third of all agricultural land in England is tenanted.***" <https://defrafarming.blog.gov.uk/2025/09/26/introducing-the-commissioner-for-the-tenant-farming-sector/>

On 6<sup>th</sup> December 2025, NSC Cabinet Member for Planning and Environment has confirmed, but not quantified that, "***The council does own a small number of smallholdings ranging from single fields of circa 0.6 ha used for grazing up to farms of circa 56.5ha.... a number of these assets have been identified through the Council's Development Programme as potential future development sites***" i.e. sites in the currently proposed Local Plan." This puts local tenant farmers, their families, food production and security at risk. No clear justification, quantification or explanation has been given.

**DEFRA also indicates that 39% of England's dairy herd is farmed in the South West.** NSC's proposed Local Plan allows solar 'farm' development on agricultural land, diminishes local contribution to the regional and national dairy production; dairy being especially beneficial/essential to the vulnerable young and elderly. A potential switch from dairy to sheep farming also impacts the local, regional and national beef production. <https://defrafarming.blog.gov.uk/2025/09/26/introducing-the-commissioner-for-the-tenant-farming-sector/>

On 29<sup>th</sup> July 2024 a resident addressed NSC Health & Wellbeing Board, raising concerns about food security, particularly in respect of the current situation facing dairy Farmers. She asked for support from the Board in respect of the representation to the Council to declare a food security emergency. <https://n-somerset.moderngov.co.uk/ieListDocuments.aspx?CId=175&MId=1208> Although a more positive response was given on 12 February 2025, it indicated that no further progress had been made. NSC's Local Plan doesn't not consider land use in relation to health and wellbeing, farming, food production and security, and therefore is not sound.

## **8. NPPF and Food production (including NSC selling publicly owned land assets)**

Up until December 2024 the NPPF 15. Conserving and enhancing the natural environment - included Footnote 63 that stated that "***Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development***". All policies effecting the land should therefore already have taken into account 'food production'; the current and proposed Local Plan does not do this in a quantified and effective manner. Tenant farmers may be a minority of NSC's electorate but the council is also looking to dispose of its tenant farming land, without considering the resulting effect on farmers, farming, food production and security. On 6<sup>th</sup> December 2025, NSC Cabinet Member for Planning and Environment has confirmed, but not quantified that, "***The council does own a small number of smallholdings ranging from single fields of circa 0.6 ha used for grazing up to farms of circa 56.5ha.... a number of these assets have been identified through the Council's Development Programme as potential future development sites***" i.e. sites in the currently proposed Local Plan." Devolution of assets to town and parishes and the private sector will be directly affecting NSC's Local Plan land use designations. This puts local tenant farmers, their families, food production and security at risk.

<https://webarchive.nationalarchives.gov.uk/ukgwa/20231228093504/https://www.gov.uk/government/publications/national-planning-policy-framework--2> (NPPF DEC23)

NSC is not protecting farm land currently, and its proposed Local Plan doesn't either, putting local, regional and national food security at risk. For example, "***The village of Backwell is making a strong appeal to North Somerset Council to reconsider plans that would see precious grade one farmland developed for housing.***" <https://somedaily.co.uk/village-urges-council-to-protect-grade-one-farmland-from-development/>

The current NPPF 11. Making effective use of land para 125 states, "*Planning policies and decisions should... b) recognise that some undeveloped land can perform many functions, such as for ... food production;*" [https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF\\_December\\_2024.pdf](https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf) (NPPF DEC24)

## **Section 11. Making effective use of land Paragraphs 124-128,**

- **NPPF para 124** "Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land". NSC has not proven it has objectively assessed farming, food production and security needs. Footnote 49 "Except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity" Agricultural land supports and sustains biodiversity and should therefore be protected under NSC Local Plan.
- **NPPF Para 125(b)** "Planning policies and decisions should: recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production" including multipurpose grazing land that should be protected by NSC Local Plan.
- **NPPF Para 125(c)** "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land" NSC has yet to respond to questions and quantify how food production will be harmed should agriculture land be built on via its proposed Local Plan, e.g. with houses, solar, BNG, nature reserves, etc.
- **NPPF Para 125(d)** "promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)" Define 'under-utilised land and buildings' in the context of agricultural land and buildings, especially in relation grade of land and tenant farmers. Footnote 50 "As part of this approach, plans and decisions should support efforts to identify and bring back into residential use empty homes and other buildings, supported by the use of compulsory purchase powers where appropriate." Compulsory purchase powers should not be used, especially to rectify a lack of, or poor, planning. Food security should be paramount and associated land at all grades be protected.
- **NPPF Para 126.** "... This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes" The development needs as identified by NSC are 8.5K houses less than that of the government. These compulsory purchase powers should not be used to achieve unproven government targets. Food production land should not be used as it risks food security and national security.
- **NPPF Para 127** "Planning policies and decisions need to reflect changes in the demand for land." 127(a) "it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs" NSC has yet to publish its research, quantification and demand for land required to secure its food production in relation to local, regional and national needs.

As far as can be ascertained NSC has not considered the effect of its Local Plan on farming food production and food security in its policies up until this time. It also clearly prioritises green initiatives and housing targets over food production and security. Nor has it clearly recognised agricultural land's existing and future essential function, that of growing food. NSC's housing and green initiatives like BNG are not one of the 13 Critical Infrastructure Sectors, whereas food production and its security is <https://www.npsa.gov.uk/about-npsa/critical-national-infrastructure>. The diminishing food producing land and the lack of agricultural land protection afforded by NSC's proposed Local Plan is of major concern, especially considering the Westminster Hall Debate: Impact of land use change on food security 18 Nov

2025 at <https://www.parliamentlive.tv/Event/Index/0142c14c-8d9e-4435-9f73-cadad1e0ec33> and Hansard Transcript at <https://hansard.parliament.uk/commons/2025-11-18/debates/40EF0BDF-9D30-480B-8B54-AB3731CAB688/LandUseChangeFoodSecurity>

## **9. Proposed Local Plan Policies**

### **DP53**

Poorly protected food production land under DP53 (Best and most versatile land) vs better protected DP52 (Protection of open space and recreation).

DP52 states, "Development on open space will only be permitted provided: • The open space is clearly shown through an **assessment to be surplus to local requirements** and will not be required for current or future needs; or • The loss of open space is to be **replaced by at least equivalent or better in terms of quantity, quality and accessibility** and there will be no overall negative impact on the provision of open space; or • The development is for alternative sports and recreational provision, which **meets locally identified needs and clearly outweighs the loss of the current or former use**". These minimum protections are needed in the Local Plan for essential food producing land.

Backwell is an example of how NSC is currently not protecting prime agricultural land, nor does it appear to intend to do so in the future.

The village of Backwell is making a strong appeal to North Somerset Council to reconsider plans that would see precious grade one farmland developed for housing. <https://somesetdaily.co.uk/village-urges-council-to-protect-grade-one-farmland-from-development/>

The use of currently used, productive agricultural land for housing, solar and other green initiatives doesn't reflect the work that would be required to restore that land to a productive state in the future, if that is at all possible. NSC policies do not clearly indicate the environmental (mining, water pollution, disposal, recycling) and social costs (slave labour)

Protecting and keeping the land is fundamental to our future ability to support our future food needs. The next generation of farmers must be recognised, encouraged and supported.

The proposed Local Plan is not sound. Create protective farming, food production and food security policies. Ensure any decision or policy has been considered in relation to farming, food production and food security.

### **DP8 Efficient Use of Land**

As seen in section 4 of this response, the proposed Local Plan doesn't reference farming, food production or security, not even in relation to "help increase the effectiveness of existing [farming/ food production] infrastructure", as indicated that it can do in DP8.

The proposed Local Plan is not sound. Create protective farming, food production and food security policies. Ensure any decision or policy has been considered in relation to farming, food production and food security.

### **LP10 Strategic Gaps**

NSC state that strategic gaps are defined to help retain the separate identity, character and/or landscape setting of settlements. If these are not put in place e.g. between rural Bleadon and Urban Weston-super-Mare then these unique settlements will be lost. This is of particular concern as NSC draft Corporate Plan indicated that it had plans for WsM to be the second largest settlement behind Bristol, which may only happen if it sacrifices the agricultural land in rural and semi-rural areas, jeopardising local, regional and national farming, food production and security. Urban/city expansion into rural communities is losing food productive and will ultimately affect those 'city' populations as less food is produced and food shortages increase. Housing should be limited to ability to produce a base level of food in secure way. All building must recognise that farming needs to be in balance.

This proposed Local Plan is not sound – Create a Strategic Gap between Bleadon and Weston-super-Mare from the A370 direction. Create strategic gaps around all urban areas to protect rural agriculture/ farming communities.

## **10. Summary**

The proposed Local Plan is not sound. Create a farming, food production and food security policies. Ensure any decision or policy has been considered in relation to farming, food production and food security. Create strategic gaps around all urban areas to protect rural agriculture/ farming communities.

In Full Council, 19 September 2023, a NSC Cabinet member stated, “... *so in the absence of government action we have no choice but to face these challenges ourselves, this will mean making bold decisions as we prepare, adapt and make the most of the opportunities a green transition will bring North Somerset through new job opportunities...* “ So it seems that NSC can be bold enough to tackle very real local farming, food production and security issues.

However, despite being its power, the current proposed Local Plan does not address the critical, life affecting, issues of farming, food production or security, It does not protect the future physical, emotional or economic health and wellbeing of our residents and communities at local, regional or national levels.

This proposed Local Plan is not sound. The proposed Local Plan is not sound. Create protective farming, food production and food security policies. Ensure any decision or policy has been considered in relation to farming, food production and food security. Create strategic gaps around all urban areas to protect rural agriculture/ farming communities.