

Biodiversity Supplementary Planning Document (SPD)

Q1

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

- Yes
- No

If 'yes', please detail what is missing:

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

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

NSC Green Infrastructure Strategy refers to food and food production but this doesn't seem to be reflected in other related SPD's such as this Biodiversity SPD. According to the NSC Local Plan DP53, "The proportion of Grade 1 land in North Somerset is approximately 7% and 10% for Grade 2." NSC's Solar Photovoltaic (PV) Arrays SPD only refers to Grades 1 and 2 land, which is only 17% of the land in North Somerset, but even this Best and Most Versatile land is not fully protected, e.g. Section 3.4, "We are not likely to support applications on the highest graded agricultural land (grades 1 or 2) and strongly encourage prospective developments towards the lowest graded land."

The government has stated that food is a critical national infrastructure issue. Therefore, we believe that food production needs to be addressed in local NSC policies to achieve this protection, to support our communities health and well-being with nutritious food, and Bleadon's rural status.

<https://www.npsa.gov.uk/critical-national-infrastructure-0>

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

<https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2021/united-kingdom-food-security-report-2021-theme-2-uk-food-supply-sources>

UK Govt Powering Up Britain Energy Security Plan, "The Government seeks large scale ground-mount solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. Solar and farming can be complementary, supporting each other financially,

environmentally and through shared use of land. We consider that meeting energy security and climate change goals is urgent and of critical importance to the country, and that these goals can be achieved together with maintaining food security for the UK. We encourage deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement. The Government will therefore not be making changes to categories of agricultural land in ways that might constrain solar deployment." and "We encourage deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement." (pg38) Although this NSC Biodiversity SPD may ensure or encourage wildlife to be pushed to the edges of solar fields, what does it do to ensure that multiple solar panel fields across North Somerset does not compromise food production?

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1148252/powering-up-britain-energy-security-plan.pdf

NSC has a Solar Photovoltaic (PV) Arrays SPD but not in relation to food production and food security.

<https://www.n-somerset.gov.uk/sites/default/files/2020-03/Solar%20photovoltaic%20array%20supplementary%20planning%20document.pdf>

UK Govt Food Security Seventh Report (28 July 2023 - footnote 11) states, "Defra is the lead Government department on food supply [PQ51874 28 September 2021], although the UKFSR states that "the role of government is an indirect one; to plan for and coordinate responses and intervene only where necessary to ensure the continuity of supply" given that the "underlying infrastructure of the supply chain is owned and operated by private industry" How is this NSC Biodiversity SPD, that encourages offset land to be used for BNG, ensure that local food security isn't compromised? How does it ensure that multiple small, medium and large parcels of land don't remove productive agriculture land from the food production system?

<https://publications.parliament.uk/pa/cm5803/cmselect/cmenvfru/622/report.html#footnote-242>

If local food security is compromised what is NSC's natural food plan? What is NSC's view on

<https://www.food.gov.uk/news-alerts/consultations/consultation-on-transitional-arrangements-for-edible-insects-in-great-britain>

Q2

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

- Yes
- No

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

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

Biodiversity SPD Section 8.2.3 "There needs to be security of the delivering for biodiversity offsetting projects. The Environment Act requires that any enhancements or provision are maintained for at least 30 years after the development is completed, this will be enforceable through a condition, planning obligation or conservation covenant. This ensures that the habitats are maintained even if the land is sold. In the case where the off-setting land is outside of North Somerset, the relevant Local Planning Authority where the BNG site is located may need to be a signatory to the legal agreement. "

This identifies the need to secure biodiversity offsetting and protect the environment but not agriculture. How will NSC enforce these BNG projects? What will be the penalties if farmers need to revert back to the land for food production for national food security within the 30 year period? Will there be enough farmers, and related industry and young people educated or skilled, to farm the land after the 30 years? Instead, can current agriculture be encouraged and supported to improve the land and ecology/biodiversity via BNG projects rather than removing the land from the food system? Can the Biodiversity SPD help create more nutritionally dense food and improve people's health and well-being, which is one of NSC's Corporate ambitions? Can NSC support farmers to continue to make local food production financially viable? Can NSC support rural communities by encouraging and supporting an increase in local smallholdings, using

traditional proven crop and animal rotation techniques, working in partnership with nature and increasing biodiversity? If solar targets need to be met can NSC ensure that they are put on housing, warehouses, supermarkets, car park roofs not on agricultural fields?

Biodiversity SPD Section 8.6.4 "The Council reserve the right to undertake compliance checks on both on-site and off-site BNG habitats. If there is failure to deliver, or attempt to deliver, biodiversity net gain outcomes which are secured through planning legal agreements or planning conditions, the Council will take the appropriate and necessary action to ensure compliance." What is the 'appropriate and necessary action'? What are the penalties?

Q3

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

- Yes
- **Somewhat**
- No

Please explain your answer if required:

Depends how biodiversity is measured, and whether biodiversity and/or the Local Plan (with its blanket solar proposals) has greater priority than food production and related public health.

Not all farmers are landowners. Landowner decisions to use the land for BNG, supported by NSC policies, may force farmers to diversify and stop food production due to lack of, or limited land availability. e.g. via reclassification from agriculture to BNG projects, trees, solar, roads, etc.

Providing and securing Biodiversity net gain Section 8.1.1 "The Council's preference is for on-site compensation and BNG measures. If this is not possible then, providing and securing biodiversity net gain should use this sequential approach: " (see figure on page 34)

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

What stops the majority, if not all, NSC agriculturally classified land (e.g. grades 1-3a/b) being used or sold for nature recovery BNG credits? What if the BNG land runs out for North Somerset development or is used up by other authorities outside North Somerset trying to achieve their 10% mandate?

BNG 10% means 10% more species, that's not the same as an ecologically sound, naturally balanced approach. If bats and birds can't hunt over the area e.g. due to solar panels, the types of species will also change, similarly with ground foraging animals. It is possible that BNG could effectively become a counting species exercise, rather properly working with nature, food production and rural communities.

According to the NSC Local Plan DP53, 77% of North Somerset is capable of supporting, or is currently supporting food production. E.g. (p182) Best & Most versatile land states, "The proportion of Grade 1 land in North Somerset is approximately 7% and 10% for Grade 2. 60% falls in Grade 3..." How much of this land is already in use as food production for people and animals, regardless of whether it is 3a or 3b, the latter seemingly a target for solar, housing, nature recovery, BNG, etc.?

NSC's Solar Photovoltaic (PV) Arrays SPD Section 4.6 "Solar PV facilities that are developed on agricultural ground must be 'reversible' allowing the site to be easily restored to agriculture. Hence intrusive groundworks, such as trenching and foundations should be minimised and the use of concrete avoided where possible. Frames should be pile driven or screw anchored and not concrete-based, and capable of

easy removal, allowing the ground to be fully restored. In windy areas the stability of the installation will need to be considered.” Has NSC any proof that the land can be ‘easily restored to agriculture’ after 20 years or more? Is there any panel ‘run off’ issues with regards to soil erosion, quality and chemical pollution? How are these potentially millions of panels going to be disposed of, what will be the effect on the environment, either in the UK or shipped abroad? How are solar panels currently being decommissioned?

NSC’s Solar Photovoltaic (PV) Arrays SPD Section 4.14 “In most instances the ground beneath solar panels is capable of remaining in agricultural use. Existing pasture cover should be maintained, whilst if the land is currently arable, applicants are advised to grass-seed the site. The land will require management, and the preferred option is that sheep grazing or similar should be enabled. If the grass is to be mown, then the potential for habitat gain, through wildflowerseeding, should be considered.” Does NSC know the effect on the soil of potentially just grazing sheep and not crop or animal rotating for 20 years or more? What will be the effect of grazing sheep rather than cows in relation to the production of beef and dairy (milk, cheese, yoghurt, butter, buttermilk, etc.) What is the effect of using chemicals for invasive weeds, under and or around solar panels, for 20 years?

Q4

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

The government’s statement on BNG was only published in Feb 2023, e.g. “Biodiversity net gain (BNG) is a strategy to develop land and contribute to the recovery of nature. It is a way of making sure the habitat for wildlife is in a better state than it was before development.”

<https://www.gov.uk/government/collections/biodiversity-net-gain>

Has any case study been followed for a full 30 years to offer any good examples and prove that BNG will improve the situation, and not detrimentally affect the existing biodiversity and multiple delicate ecosystems? How is 10% being measured that ensures that NSC can show Biodiversity Net Gain projects create a robust increase in biodiversity over the planned 30 years?

Is NSC aware of any English Local Planning Authority BNG projects that benefit food production or will the land used always reduce the existing food security, and type of food produced?

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

You can upload up to 4 files.

Q5

Do you have any other comments on the SPD?

How much new resource will be required to maintain BNG 10% e.g. chemical, water, transport, financial, etc. and how will that effect the environment?

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

