

**North Somerset Council Responses to
16 October 2024 Public Participation at the Cabinet Committee**

12 November 2024 Lucy Shomali Director of Place

19 November 2024 Response email to Bell & Walker

06 December 2024 Jo Walker Chief Executive NSC

From: Sara Stock <Sara.Stock@n-somerset.gov.uk> **On Behalf Of** Lucy Shomali
Sent: 12 November 2024 11:08
To: jogc@bleadonparishcouncil.co.uk
Cc: Annemieke Waite (Councillor) <Annemieke.Waite@n-somerset.gov.uk>; Jenna Ho Marris (Councillor) <Jenna.HoMarris@n-somerset.gov.uk>
Subject: Response to Public Participation at Executive 16 October 2024 - question from Jo Gower-Crane

Dear Ms Gower-Crane

Apologies for the delay. In response to the question you raised at Executive on 16 October where you asked for an update on food and food security and consideration of the impact of the council's plan to join the West of England Combined Authority I can respond as follows.

North Somerset Council recognises that food security is a national issue that is being considered as part of the wider work of the UK government and devolved administrations.

The [UK Food Security Index 2024](#), provides an assessment of the state of UK food security using the latest available evidence. The index is designed to complement the three-yearly [UK Food Security Report \(UKFSR\)](#) which is a comprehensive analysis of statistical data relating to UK food security. As of July 2024, the indicators in the UK Food Security Index have been summarised as follows:

*'Taking a holistic view across the indicators in the index shows a **broadly stable picture** as the UK comes out of a challenging period of global supply chain shocks. However, this should be seen in the context of **longer-term risk from climate change**: an exceptionally wet winter and spring in 2024 poses significant challenges to some domestic production.'*

Indicator	Assessment
Indicator 1: Global food supply for human consumption	Broadly stable
Indicator 2: Share of global cereals and soyabeans internationally traded	Broadly stable
Indicator 3: Production-supply ratio	Broadly stable
Indicator 4: Agricultural total factor productivity	Some reduction in risks
Indicator 5: Agricultural land use	Broadly stable
Indicator 6: Energy and fertiliser prices	Some reduction in risks
Indicator 7: Business investment	Broadly stable
Indicator 8: Biosecurity risk	Broadly stable
Indicator 9: Consumer confidence in food supply chain actors	Broadly stable

North Somerset Council is committed to engaging with the relevant central government departments as needed on the issue of Food Security. In addition, the council continues to work across a number of areas relating to food security including:

- Land use allocations and protections. As far as possible within national planning regulations and targets, our emerging local plan recognises the importance of protecting the best and most versatile agricultural land (grades 1, 2 and 3a) from inappropriate development by using areas of poorer quality land in preference to those of a higher quality. [Policy DP53 Best and most versatile land](#) (North Somerset Local Plan Reg 19 version July 2024) sets out the proposed approach.
- Support for activities linked to food production, processing, procurement and distribution, for example the council's support in building and setting up [FoodWorks SW](#), a centre of excellence for nurturing local food and drink business and their products.
- Addressing food poverty and inequalities that exist within our communities, with a commitment in our refreshed [Corporate Plan](#) to develop a local Food Strategy.
- Consideration of the impact of food as part of a balanced diet and the impact on health and wellbeing of our community and citizens via the actions in our [Joint Health and Wellbeing Strategy](#) and our ongoing partnership work with the Integrated Care System.

Should the council join the West of England there is potential to lobby government from a wider, regional perspective on the issue of food security and to work across a wider area to support activities related to food production processing, procurement and distribution in particular.

I hope this response is helpful.

Kind regards

Lucy

Lucy Shomali (she/her)

Director of Place

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From: jogc@bleadonparishcouncil.co.uk <jogc@bleadonparishcouncil.co.uk>

Sent: 19 November 2024 16:21

To: 'mike.bell@n-somerset.gov.uk' <mike.bell@n-somerset.gov.uk>; 'jo.walker@n-somerset.gov.uk' <jo.walker@n-somerset.gov.uk>

Cc: 'mark.canniford@n-somerset.gov.uk' <mark.canniford@n-somerset.gov.uk>; 'Annemieke.Waite@n-somerset.gov.uk' <Annemieke.Waite@n-somerset.gov.uk>; 'Jenna.HoMarris@n-somerset.gov.uk' <Jenna.HoMarris@n-somerset.gov.uk>; 'Sara.Stock@n-somerset.gov.uk' <Sara.Stock@n-somerset.gov.uk>; Bleadon Clerk <parishclerk@bleadonparishcouncil.co.uk>

Subject: Re: Response to Public Participation at Executive 16 October 2024 - question from Jo Gower-Crane

To Cllr Mike Bell (Leader of the Council) & Ms Jo Walker (North Somerset Council CEO)

Last week I received a reply on your collective behalf, regarding agricultural land allocation, farming, food production and security, as seen below. However, yet again concerns and questions have not been addressed or answered. Your response appears to send me back to the council policies and government security reports that I questioned last December 2023 and followed up in October 2024 (both attached). I understand that the Executive Committee will be asked imminently to approve the new housing allocations, with public consultation on the new draft Local Plan due to commence in the New Year, so a resolution to this ongoing issue is of some urgency.

As you are aware, farmers are under increasing pressure from government policies at all levels; vulnerable tenant farmers are particularly at risk. Agricultural land used for producing food, is being sacrificed in all classifications by your policies, in favour of housing and energy plans. Conversely, [Policy DP52](#) for the Protection of Open Space and Recreation has much greater land protection i.e. development will only be permitted if the space is surplus to requirement; or replaced by equivalent or better provision; or it is for alternative sports and recreational equivalent. The title makes it clear. Your response regarding [Policy DP53](#) for Best and Most Valuable Land indicates that this policy continues to be full of exceptions to agricultural use, rather than protections for the land needed for farming, food production and security and associated rural communities.

The amount and grade of agricultural land that you propose to be lost is still not clearly quantified; nor is the associated loss of food production.

Cllr Bell, when I became a parish councillor last year you spoke at an ALCA meeting confirming that should we have problems to contact you personally – I am doing that now. As you know I have addressed Executive and Scrutiny Panel members regarding council's prioritisation of housing and energy, at the detriment of (land) farmed food that is essential to life. I've raised concerns that the council doesn't seem to acknowledge that food is one the government's [13 Critical Infrastructure Sectors](#), whereas housing is not. I met with Executive lead councillors for the Local Plan/Economy/Placemaking and Energy/Climate/Waste/Sustainability in January 2024. They acknowledged that food security and associated agricultural land is not well addressed or protected in the Local Plan, and proposed a Supplementary Planning Document – I've heard nothing since that meeting. I'm also aware that in July 2024 a resident asked Executive members to call a Food Security Emergency - I've yet to hear the outcome. None of these discussions or concerns seem to be reflected in the Scrutiny Panel 19 November agenda

paper [item 7](#), nor addressed in the publicly visible Draft Local Plan, nor via public communications or correspondence to parish councils.

Ms Walker - Over the consultation period since March 2020, I have spoken with a number of your officers responsible for council strategic policy, local plan, biodiversity, rural strategy and more recently devolution. Again, all of whom appear to recognise and acknowledge the lack of protection for agricultural land, but this does not appear to be reflected or evidenced in your Local Plan visible to the public, nor in correspondence to parish councillors. As a result, it seems from last week's response, [Policy DP53](#) continues to be full of exceptions rather than protections for the agricultural land needed to produce food to eat.

The current response appears to try and answer farming and food production at a national, not local North Somerset level. The remaining responses that focus on '*nurturing local food and drink business and their products*' and its use in health, are dependent on food actually being produced and grown on fields, in order for other businesses to process and people to subsequently consume. The response doesn't answer original and ongoing concerns and questions regarding how the council is stabilising and/or improving local food security; how it is protecting local agricultural land needed for land-farmed (unprocessed) food production; nor how it is protecting related local rural communities, their culture and heritage. To help clarify the concerns and facilitate answers, I have attached more detailed discussion information.

I would appreciate a meeting with you both as soon as possible to discuss and resolve the outstanding concerns, before the 4 December, the next Executive Committee meeting, and before the Local Plan is released for re-consultation.

Kind regards,

Cllr Jo Gower-Crane

From: Sue Bullock <Sue.Bullock@n-somerset.gov.uk> **On Behalf Of** Jo Walker

Sent: 06 December 2024 15:08

To: jogc@bleadonparishcouncil.co.uk

Cc: Mike Bell (Councillor) <Mike.Bell@n-somerset.gov.uk>; Annemieke Waite (Councillor) <Annemieke.Waite@n-somerset.gov.uk>; Jenna Ho Marris (Councillor) <Jenna.HoMarris@n-somerset.gov.uk>; Lucy Shomali <Lucy.Shomali@n-somerset.gov.uk>; Jason Beale <Jason.Beale@n-somerset.gov.uk>; Chris Head <Chris.Head@n-somerset.gov.uk>

Subject: FW: Response to Public Participation at Executive 16 October 2024 - question from Jo Gower-Crane

Dear Cllr Gower-Crane

Further to your email of 19 November I have sought further input from my teams to respond to the issues you have raised, in particular in relation to our policies around land use and specifically the protection of agricultural land as part of a response to protecting food security. I will also touch on our wider commitment and approach as a council to supporting better food-related health and wellbeing outcomes for our communities.

The Local Plan guides where new development will go across North Somerset over the 15 year plan period. It needs to balance competing demands such as food security, energy security and protecting and enhancing the natural environment as well as delivering growth through a sustainable spatial strategy. As you are aware the new government have placed increased weight on the delivery of housing through the planning system and the government's housing requirement for North Somerset has increased to 23,805 dwellings over the plan period. This is an additional 8,530 dwellings from what was proposed in the version of the plan approved at Executive in July 2024. This is an extremely challenging requirement but government is clear that it is mandatory and has also relaxed the approach to protecting Green Belt to try and ensure delivery of these housing targets. The delivery of housing in sustainable locations needs to be balanced with other factors such as heritage, ecology, landscape, flood zone and protection of best and most versatile agricultural land (BMV). Therefore, when assessing whether sites are suitable to allocate for development all of these factors need to be weighed in the planning balance.

In relation to BMV the National Planning Policy Framework states (para 180(b)) that "*Planning policies and decisions should contribute to and enhance the natural and local environment by...recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.*" Footnote 63 goes on to states 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*". (Although it should be noted the recent government consultation on the NPPF proposes to remove the last sentence of this footnote).

The emerging Local Plan considers the role of agricultural land in a number of its policies. Strategic Policy SP11: Historic and natural environment states that "*New development will, where appropriate, be expected to protect the best and most versatile agricultural land*", Policy DP5: Climate change, adaptation and resilience requires climate change adaptation statements to consider protection of BMV, and Policy DP53: Best and Most Versatile Land looks to protect

the highest quality agricultural (grades 1 and 2) stating that “*This finite resource will be safeguarded from development to ensure its long-term potential for food production and to protect the soil resource*” and identifies a limited number of uses that would be acceptable on this land. It also sets criteria limiting the type of development that would be suitable on grade 3a BMV land and recognises the limitations of the available data on agricultural land classifications (which do not provide a distinction between grade 3a and 3b) and therefore requires a full survey of sites where the land classification is uncertain or classed as Grade 3 without further subdivision to establish the soil quality.

In terms of agricultural land being used for renewable energy generation the current [Solar Photovoltaics SPD](#) sets out detailed guidance in terms of solar PV arrays. It states “*The expectation is that where possible solar PV arrays are located on previously developed and/or contaminated and industrial land and its margins, and should avoid areas that are undeveloped. A preference is given to solar PV arrays mounted on top of existing roofs, or integrated into new roofs and buildings. This can include structures above car parks, park and ride sites, retail and industrial units or at railway stations. If the proposal does involve greenfield land, it should avoid using the best and most versatile agricultural land (grades 1 and 2), be closely related to other built development such as farm buildings or hardstandings, and allow for continued agricultural use and/or encourage biodiversity improvements around the arrays*”. This approach is reflected in emerging policy DP53 which does not permit renewable energy production on BMV grades 1 and 2 and only on grade 3a if the land could be returned to agricultural use without a loss of soil quality.

The Environment Act 2021 introduced a statutory requirement for most development to deliver 10% biodiversity net gain. Draft policy DP36: Biodiversity net gain in the emerging Local Plan sets out this requirement stating that where appropriate biodiversity net gain should be achieved on-site unless it can be demonstrated that this is not possible or that there are over-riding benefits to making provision elsewhere.

Diversification of agricultural and other land-based rural businesses is supported by the NPPF (para 88). This is reflected in the emerging policy DP55: Agriculture and land based rural businesses which sets out what form of development or diversification would be acceptable. This states that proposals should be necessary for, and ancillary to, the use of land for viable agricultural or land-based rural business purposes and in the case of diversification that there is certainty of long term benefit to the farm business as an agricultural operation.

The view of North Somerset Council officers and members is that the emerging Local Plan provides a policy framework which ensures BMV is considered throughout plan-making and decision-taking and the proposed Policy DP53: Best and Most Versatile Land would provide greater protection to BMV in North Somerset than is required by national policy. As far as we are aware none of our neighbouring authorities currently have, or are proposing, local plan policies regarding Best and Most Versatile Land and so North Somerset are taking the lead in this area.

In terms of producing an SPD, Supplementary Planning Documents are planning tools used to provide more detailed advice or guidance on how policies or proposals in an adopted local plan will be implemented. They are required to be linked to an adopted policy in the Local Plan and so an SPD on agricultural land/food security would need to follow the adoption of the Local Plan. Due to the pause and further consultation on the Local Plan that will be necessary with the new housing targets from government and likely changes to the NPPF, adoption is now unlikely before the end of 2026.

Proposed previous government reforms to the planning system also indicated abolishing SPDs and replacing them with alternatives and it is not yet clear whether the new government are going to continue with these changes. Furthermore, as national planning policy and guidance is fairly limited in terms of BMV it is unlikely that an SPD could add any significant further detail to what is already set out in emerging policy DP53 which is robust in its protection of the highest quality agricultural land. It is also worth mentioning that the government intend to consult on National Development Management Policies next year which may contain further guidance around this issue.

Following the decision at Executive on 4th December the council will be undertaking consultation in early 2025 on where new housing should go in North Somerset to make up the additional housing shortfall. This will provide an opportunity to submit your views on the allocation of land for housing. We will then be consulting on a full Regulation 19 Plan later in the year prior to submitting the plan for independent examination. In terms of our Rural Strategy, this was prepared in the policy context that existed in the first half of 2024 to guide us in our strategic policy making. We will need to update the Rural Strategy when the current emerging Local Plan is adopted and within the council's current financial constraints.

I also wanted to comment on the council's commitment to supporting better food-related health and wellbeing outcomes. In North Somerset, our commitment to improving people's access to healthy foods and to addressing food-related ill-health is demonstrated through prioritization of food, nutrition and oral health in our Joint Health and Wellbeing Strategy, and through action with the Bristol, North Somerset and South Gloucestershire (BNSSG) Integrated Care Partnership (ICP). The current North Somerset Joint Health and Wellbeing Strategy 2021-2024 includes 'food, nutrition and food insecurity' as one of seven priority themes. Our forthcoming, refreshed strategy for 2024-2028 similarly includes 'food, nutrition and oral health' as one of the priority themes, in continued recognition of the high population prevalence and the long-term consequences of an unhealthy diet and of living with overweight and obesity.

The 'food, nutrition and oral health' theme was selected as one of two priorities for new investment as part of Health and Wellbeing Strategy implementation for 2024-2028. Actions to be developed and implemented include (but are not limited to): contribution to the whole system approach, led by BNSSG ICP, to supporting people to eat and live well; support for community and school-based activities to enhance access to, and consumption of, healthy foods; continued preventive activity around oral health among children and young people; and 1:1 and group support for healthy lifestyles. However, while our actions aim to improve relevant health and wellbeing outcomes for our population, evidence suggests that actions that may have the greatest impact on addressing the prevalence of overweight and obesity are those implemented at a national level via changes to policies related to unhealthy food and drink products. Many of these changes would ensure that healthier options are more widely accessible and affordable for the population.

I hope the above answers your concerns.

Kind regards

Jo

Jo Walker (she/her)

Chief Executive

North Somerset Council

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