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Strategy
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Date: 26th April 2013

Dear Sir/Madam

**Consultation Response to: Inspector's Further Main Modifications –
South Gloucestershire Core Strategy**

The National Farmers' Union in the South West represents 10,500 farmer and grower members in the region and write with the following comments for consideration on the Inspector's Further Main Modifications.

We note our comments should be confined to the Further Main Modifications and Sustainability Appraisal Report.

Agriculture summary

As you will be aware agricultural is going through a considerable period of change and volatility. The markets have been extremely volatile with fluctuating commodity prices and high input prices all at a time when globally businesses are being hit by lack of access to capital. As a consequence the NFU continue to highlight the following key priorities for planning policy.

- The definition of sustainable development must not be solely in 'urban' terms but must recognise the needs of rural areas.
- The planning system must be a vehicle for economic recovery. This includes the rural economy where planning should be about managing change not its prevention.
- There should be a presumption in favour of development that promotes food production and renewable energy.

Flooding:

The recent flooding issues have had a detrimental effect on farming & we concur with the importance of government guidance reiterated in the statement 6.10:

Government guidance requires that a sequential test relating to flood risk is applied to the identification of land for development, to ensure that there are no alternative sites available in



areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed.

Housing:

We welcome the modifications:

- *MM27 - Maintain the settlement boundaries defined on the Policies Map around rural settlements until they are reviewed in the Policies, Sites and Places DPD or a replacement Local Plan following engagement with local communities and other stakeholders/partners;*
- *5. In the rural areas communities will be empowered to shape the future of their own local area through opportunities presented by Neighbourhood Planning.*

We would endorse the comment in 6.8 as to the importance for the rural areas communities to be empowered to shape the future of their own local area through opportunities presented by Neighbourhood Planning.

However, we are concerned with article 10.10 which states that, *increasingly new housing development will have to be on greenfield sites, & that these greenfield sites support the Core Strategy's Strategy for Development and will help in delivering the longer term vision for the West of England.*

The use of existing brown field sites within town centres and in rural locations should be thoroughly explored first for housing development before turning to large Greenfield development so as to protect our best and most versatile agricultural land.

Rationale:

1) Food Security and Supporting Core Agriculture

With a rapidly growing population the pressures on land-use are greater than ever before and in a time of food shortage and rising costs for consumers farmers need to become more productive. An objective within the core strategy should see investment in core agriculture to facilitate increased agricultural output. The use of productive agricultural land must be avoided.

The rural economy is linked to two key Government priorities food production and renewable energy as well as farm diversification. The first of these priorities is contained in DEFRA's Business Plan which recognises the importance of the support and development of British farming and encouragement of sustainable food production. The importance of food production is further highlighted in the recent Foresight Report "Global Food and Farming Futures" submitted to Government. This report makes the case for urgent action, raising the political profile of food, developing a global food strategy and the need for a sustainable food system to meet an estimated global population of 9 billion by 2050 and a required food production increase of 50% by 2030.

2) Renewable Energy

The second key area is in renewable energy, where the Government has a commitment to produce at least 15% of energy from renewable sources by 2020. The countryside and farming can make a vital contribution to this policy objective given the large untapped potential across

the full range of renewable energy technologies and contribute to the economic development within South Gloucestershire.

3) Sustainable Development

The Sustainability Appraisal evaluates the following:

- 5. Maintain and improve environmental quality and assets*
- 5.1 Protect and enhance habitats and species (taking account of climate change)*
- 5.2 Promote the conservation and wise use of land*
- 5.3 Protect and enhance landscape and townscape*
- 5.4 Value and protect diversity and local distinctiveness including rural ways of life*
- 5.5 Maintain and enhance cultural and historical assets*
- 5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)*

By retaining our best and most versatile agricultural land, these key criteria can be met.

Summary:

We welcome the opportunity to comment on the Further Main Modifications.

The NFU appreciate the needs within the Core Strategy to plan for future housing requirements and are supportive, on the basis that our best and most versatile agricultural land is protected.

Further we support the government guidance on the sequential test is carried out relating to flood risk and that this is applied to the identification of land for development.

We would also support on farm developments to facilitate increased food production, farm diversification and, sustainable investments in renewable energy projects.

The NFU would welcome the opportunity to respond to any further consultations from the South Gloucestershire Council.

Yours sincerely



Colin Downey
Gloucestershire County Adviser