



The National Farmers' Union represents 55,000 farm businesses in England and Wales involving an estimated 155,000 farmers, managers and partners in the business.

Warrington Local Plan Preferred Development Option

Dear Sirs,

The NFU is particularly concerned with the significant loss of green belt where this is farmland proposed in the draft plan. Recognition of farming as a sector, robust rural proofing and farming and agricultural references in the plan are lacking. The benefits of farmland, countryside and rural open and greenspace are packaged up and then only implied and not made explicit at all in numerous references to Green Belt.

It is worth mentioning, especially in the context of Brexit and the uncertainty this creates both to the UK and the agricultural sector, that the UK will still need to feed itself, grow, produce, process and sell food. The wider agricultural and food chain economy is worth £109 billion to the UK. The contribution that Warrington can make to its own food security whilst contributing to UK food security, as well as wider benefits such as reducing flood risk and recreation are undermined by a significant loss of Green Belt especially where this happens to be productive farmland. However farmers also need to maintain the viability of farms by utilising land. Where it is appropriate and makes economic sense some development on farmland should be allowed.

The NFUs stated position on Green Belt is as follows:

- Green belt policy should recognise that the growing of food and other farm products whether within open fields, farm buildings and or glasshouses, within or adjacent to the Green Belt, provides a valuable and sustainable use of land, which is also well placed to serve growing domestic markets.
- Farmland and farming activities should continue to take priority in Green Belt, with national and local planning policy that promotes farming. Any decision on green belt should strategically assess the impact of other development on both farm land and the future growth of farm businesses and any adjacent farm businesses.
- Planning policy for farms in Green Belt should seek to promote diversification opportunities that will help support productive farm businesses, including for leisure and recreation, local food production, packing and retailing, homes on farm, employment and renewable energy as well as opportunities to increase biodiversity and local wildlife.
- Green Belt planning policy should recognise that farmers and growers should be able to choose to put forward land for housing development where this makes economic sense and supports their wider farming businesses.

The current plan and the way it is worded, what is contained in it and what isn't would lead one to question whether SA/SEA and the Green Belt assessment are sufficiently robust and comprehensive to properly and genuinely 'rural proof' the plan, especially in the context of significant proposed 'green belt release' and in particular where this is higher grade farmland. Whilst it is appreciated this plan does not exist in isolation this conclusion is a result of seeing no references to agriculture/farming in the Preferred Option document.

The devastating floods at the end of 2015 and into 2016 across the North West as well as Brexit and food security should reinforce, in collective thinking of Warrington Council, that the precautionary approach, meaningful future proofing and adaptation are vital. Whilst large areas of Warrington are already heavily urbanised large areas are non-urban and some areas are distinctly rural. Where farmers and open land are providing 'services' which benefit people and property, such as natural flood management, reducing peak flows, flood water storage, recreation, wildlife etc. these should be valued. Where farmland is protecting communities from flooding there should be adequate compensation or incentive to farmers and landowners for providing these 'services' which often have a significant impact on farming operations. However, whilst it is appreciated that compensation/incentive is currently outwith the remit of this plan this approach and the notion of natural capital more widely would work to enhance this plan and potentially other of Warrington's plans by providing a degree of policy future proofing.

It should be highlighted that farmers/farmland will, in all but exceptional circumstances, have received various payments and support over many years designed to support the sector and achieve certain aims and objectives. This funding (BPS, ELS, HLS, CS, CSF) and the outcomes it has achieved and is still achieving are all aligned to UK policy and priorities but they are ignored in the plan.

The flood plains in the Green Belt should not be cut off or isolated to function as flood plains. Any infrastructure should not dissect, pinch or constrain the floodplain, increase flood water flow and cause deposition and problems or increased risk to surrounding and adjacent areas including farmland.

The National Planning Policy Framework (NPPF) confirms the government's position that Local Authorities should also support a prosperous rural economy and economic growth. Paragraph 28 states that "*planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development*". This includes the need to "*support the sustainable growth and expansion of all types of businesses and enterprises in rural areas, and promote the development of agricultural and other land based businesses both through the conversion of existing buildings and well-designed new buildings*".

The 2017 NFU Election Manifesto confirms that for every £1 invested in farming the industry puts £7.40 back into the UK economy.

NPPF paragraph 17 states that planning should "*proactively drive and support sustainable economic development...every effort should be made objectively to identify and then meet the housing, business and other development needs of an area*". Paragraphs 18, 19 and 20 state that the Government is committed to securing economic growth; that the planning system does everything it can to support sustainable economic growth; that the local planning authorities should plan proactively to meet the development needs of business. Farms are also businesses that not only provide food to the nation but support many other businesses from vets to feed suppliers, engineers to land agents.

The NFU feels that it is worth highlighting that farmers are required to be legally compliant across many aspects of their operations, they are required to achieve high standards as a result of agricultural support schemes, meet stringent animal welfare standards as well as high standards imposed on them as suppliers to the food industry.

At a time when farmers and landowners along the length of river catchments are being asked to play an increasing role in catchment management, natural flood management, 'slowing the flow,' work which

will benefit communities along the catchment in reducing flood risk, the NFU feels that it is important to stress the importance of the alignment of plans, strategies and projects dealing with climate change, adaptation and flood risk management. Policies should be stating greater efforts for consistency and alignment. This is to ensure that increasingly vital work right along the catchment by farmers to slow the flow (e.g. tree planting, leaky dams, flood water storage, changed farm practices) which will work to protect communities, are not compromised or undermined by poor planning policies, poorly designed and sited urban developments and associated infrastructure and an unwillingness to enforce policy and conditions. Other work by farmers, where it is appropriate, to clear channels and remove vegetation to help water flow in lower lying areas is equally as important as slowing the flow. Unsustainable development up and down the catchment as well as disconnected plans and priorities can contribute to devastating consequences caused by flooding in rural and urban communities.

The NFU has already set out its broad headline commitments dealing with flooding prior to the publication of its new Flooding Manifesto early in 2017. These are:

- The Importance of protecting agricultural land
- Climate Change
- Investment in flood risk management
- Planning for flood and coastal risk management
- Internal Drainage Boards
- Agriculture's role in reducing flood risk
- Planning For Urban Runoff
- Natural Flood Management
- Flooding and Compensation
- Lessons Learned from the Netherlands
- Flood Resilience & Preparedness

Yours faithfully

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