

The Wickham Society

Respondent Reference Number WP149

Further statement on the Welborne Plan

relating to hearing matters 1.3 and 1.4.

The Wickham Society has made representations during the consultation periods for both the Welborne Plan and the Sustainability Appraisal of the Welborne Plan.

However, in the light of evidence that has recently become available to us we wish to develop our concerns that during the planning process Fareham Borough Council has not heeded central government guidance and paid scant regard to the advice of its own consultants on the agricultural value of the 675 acres which underlie the majority of the proposed Welborne development.

Central Government Guidance

Natural England Technical Information Note TIN 049 applies. Agricultural land is vital to sustainable development and it should be protected from inappropriate development.

A recent report from the University of Cambridge Institute for Sustainability Leadership "The best use of agricultural land" (2014) enhances this view and emphasises the importance of decisions affecting agricultural land. It shows that an extra 7million hectares is likely to be needed for food, space and energy production, but only 5 million hectares of spare land can be identified. This assumes that our food supply from abroad remains broadly as it is now. It would seem that it is essential to retain the best and most versatile land i.e., that which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non food uses.

Note TIN049 quotes the Government National Planning Policy Framework.

Paragraph 112 applies. Decisions rest with the relevant planning authorities but they should take into account the economic and other benefits of the best and most versatile land. Where significant development of agricultural land is demonstrated to be necessary, all local planning authorities should seek areas of poorer quality land in preference to that of higher quality.

The Government has also re-affirmed the importance of protecting our soils and the services they provide in the Natural Environment White Paper "The Natural Choice: securing the value of nature" Para. 2.35 (June 2011).

The definition of the best and most versatile land in the United Kingdom depends on the Agricultural Land Classification system which classifies land into five grades, but includes grades 1,2 and 3a as best and most versatile land.

This Classification is of particular relevance to the area in which it is proposed to develop Welborne. There are two sources of information for this land.

The Agricultural land Classification map

<http://publications.naturalengland.org.uk/category/5954148537204736> shows Welborne land as predominantly grade 2. but a more recent source "MAGIC" <http://magic.defra.gov.uk>. shows it predominantly as 3a. Both maps confirm that the land east and west of the A32 between Fareham and Wickham is some of the best in South Hampshire

Consultant's advice.

Both these sources were used by Urban Edge Environmental Consulting who were employed by Fareham Borough Council to produce the Sustainability Appraisal for the Welborne Plan. They concluded (p 99):-

- The plan area is underlain with areas of best and most versatile agricultural land.
- Development proposed at Welborne will lead to the loss of soil resources, productivity and function.

In a recent letter Mark Hoban the Member of Parliament for Fareham has expressed the opinion

“Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land.”

I would like to reassure you that this amounts to a strong legal protection. It explicitly draws attention to the crucial role agriculture plays in securing employment, production and trade in rural areas. It also implicitly acknowledges that agricultural land has social and environmental dimensions, which need to be weighed when local authorities put together their local plans and when they decide on planning applications.

In what appears to be a dismissal of their consultant's advice, there is no mention of Agricultural land in the FBC Welborne Plan (LP3) and there is only passing reference to it in the Core Strategy (LP 1), as follows.

- 5.86In refining the broad area of search the Council was aware of the need to protect the best and most versatile agricultural land, but this needed to be balanced against other environmental constraints.

The nature of the environmental constraints is not made clear and indeed it is our recollection that at the Full Council meeting in November 2010 the Executive Leader told Councillors that the land in the Area of Search was "not of the highest quality." If our memory is correct, this statement, although true, is misleading as at least 2/3 of the area is classified as the best and most productive agricultural land and has strong legal protection (see above). However it has passed into general circulation as evidenced in another letter from Mr Hoban.

FOI Request.

Clearly only minutes of the Council meeting(s) where the agricultural value of the land was considered and reasons why this should be set aside in favour of development can resolve these issues. As this is so, we made a Freedom of information request to the Council quoting Urban Edge Environmental Consulting's p99 conclusion in the Sustainability Appraisal (January 2014) and the National Planning Policy Framework paragraph 112. We asked to see the minutes of the meeting(s) at which Councillors set aside the value of 675 acres of high quality and productive arable land and justified their decision to plan for a new town built over it.

FBC Reply

- The issue of the loss of agricultural land through the development of the New Community North of Fareham was addressed in the Council's Core Strategy (Para. 5.86). The Pre-Submission draft Core Strategy was considered by the full Council at their meeting of 18 November 2010. The decision to adopt the Core Strategy was taken by the Full Council at their meeting of 11 August 2011.
- Appendix D of the accompanying Sustainability Appraisal Report sets out an assessment of the policy options considered against the sustainability objectives. The report also highlights the loss of agricultural land (Para. 5.6.17, 6.2.37).
- The loss of agricultural land was again recognised in the Sustainability Appraisal process which accompanied the production of the Welborne Plan. Agricultural land is recognised in the Sustainability Objectives (Table 3.1). The report also recognises the loss of the best and most versatile agricultural land (e.g. Para. 5.3.18).
- The Publication Draft Welborne Plan and accompanying Sustainability Appraisal were considered by the Full Council at their meeting of 13 February 2014.

We do not find this reply at all satisfactory.

- Core Strategy paragraph 5.86 contains half a sentence which states that the Council was aware of the need to protect the best and most versatile agricultural land (see above) and as far as we are aware, in the absence of minutes, the value of the land was not discussed at either of the meetings (18th November 2010, 11th August 2011).
- The Sustainability Appraisal accompanying the Core Strategy (UE Associates) indeed stresses the loss of the best and most versatile land. Para. 5.6.17 and Para.6.2.37 both highlight the quality of the land and point out that the development of the SDA will lead to the loss of a large area of the best and most versatile agricultural land. What is quite extraordinary is that the Core Strategy policy CS 16 states that it will prevent the loss of such land. This is hardly compatible with a large new town covering the area.

- A member of the Wickham Society was present in the public gallery at the Full Council meeting on 13th February 2014 when the Welborne Plan was accepted. As far as we are aware there was no discussion of the agricultural value of the land and a justification of the need to override it for development. We are pursuing an enquiry with Defra to seek any ruling and advice on development of Grade 2 and 3a land. We wish to stress that there appears to be no evidence, written or otherwise, that Fareham Council has weighed the agricultural value of the Welborne in a way that would conform to NPPF.

It is true that the original SDA development plan was initiated in the South East Plan. "In December 2005 the Partnership for Urban South Hampshire (PUSH) submitted its advice to the South East of England Regional Assembly (SEERA) on the appropriate distribution of new housing across the South Hampshire sub-region" (Core Strategy). The South East Plan has been rescinded, both SEERA and GOSE have been closed and it is very difficult, by searching archive material, to find any evidence that the quality of agricultural land was considered. However an information request to Natural England has produced the following response.

- Joint advice on BMV land and soils issues was provided to the Government Office for the South East (GOSE) by the legacy bodies (English Nature, Countryside Commission and the Rural Development Service) which now make up Natural England, during consideration of the draft regional spatial strategy, the South East Plan, which had been prepared and submitted by the South East Regional Assembly (SERA) in 2006. At that time the responsibility for best and most versatile agricultural land and soil matters in spatial planning (and until its closure in 2011) was principally with Defra-facing staff within GOSE. The response to the consultation on the draft regional strategy suggests that GOSE did raise these issues at the time but it seems they were not taken forward by the then South East Regional Assembly as the archived Website page of the summary of consultation responses shows under the topic of 'Sustainable Natural Resource Management'.

It may well be that issues relating to the use of valuable agricultural land were not considered important at this early planning stage. However the Welborne Plan is produced in the current planning environment.

Conclusion The inclusion of references to agricultural land in the Core Strategy and the Welborne Plan Sustainability Appraisal provides no evidence that this issue was considered, let alone satisfactorily assessed by Fareham Borough Council. Neither the Core Strategy nor the SA and its appendices contain any references to the assessment of any options that would ensure, as far as is practical, that the best and most versatile agricultural land within the site is either protected or used for local food production in accordance with paragraph 5.125 of the Core Strategy. This suggests that the Welborne Plan is premature and not consistent with National Policy. It is therefore unsound. We would suggest that the Welborne Plan should be revisited by Fareham Borough Councillors for open discussion in the light of present planning guidance.