

From: [REDACTED]
To: [Local Plan](#)
Subject: Consultation on Warrington Borough Council's Updated Proposed Submission Version Local Plan (2021)
Date: 15 November 2021 13:24:02
Attachments: [REDACTED]

Dear Sir

I am writing in behalf of the National Farmers Union to make some general comments with respect to the Consultation on Warrington Borough Council's Updated Proposed Submission Version Local Plan (2021)

The Warrington Draft Local Plan states that Warrington has a varied landscape character, important areas of nature conservation value and extensive areas of high-grade agricultural land including its sites of international, national and local importance for biodiversity. In these areas agriculture is the dominant land use and has shaped the landscape as well as being an economically important sector to the economy of the area. Therefore it must be recognised that this is a working environment as well as a place of natural beauty and biodiversity. Planning policies need to provide a framework whereby farm businesses can prosper and also be flexible enough to allow them to develop and meet the needs of modern supply chains and changing consumer demands.

At present it is an incredibly uncertain time for farm businesses as we prepare to leave the European Union. This may not only impact in our access to EU markets which are traditionally very important for UK sheep producers (roughly 1/3 of our lamb enters into this market) but we are also faced with a seismic change in the way in which agricultural support will be delivered onto farm. We will move away from a simple system based on payment per hectare of land to one where farmers will be paid public money for delivering public good. Some farm businesses in Warrington are dependent on support for maintaining farm income and this change could have a significant impact on how they operate. Planning policies need to allow them to adapt their business to take advantage of any opportunities which may arise when we leave the EU, particularly around areas such as renewable energy and diversification enterprises.

Policy DEV4 concerns Economic Growth and Development and it is pleasing that it states that "The sustainable growth, expansion and diversification of local and rural businesses will be supported, subject to meeting other relevant Local Plan and national policies." The government is encouraging farmers to diversify their businesses and develop other income streams and tap into new markets, including tourism. As such planning policy should look to support farm diversification developments.

Policy GB1 sets out the principles for development in the Green Belt. It states that "In accordance with national planning policy, within the Green Belt, planning permission will not be granted for inappropriate development, except in 'very special circumstances'" National Policy defines development of buildings for agriculture and forestry as appropriate development. There are a considerable number of agricultural businesses within Warrington with a wide range of farming types. These not only provide food, employment and environmental output but are custodians of the green space which has enormous benefits in terms of health. As a general point policies should support the development of agricultural businesses and recognise the importance of the rural areas in the region.

Policy ENV7 looks at Renewable and Low Carbon Energy Development and recognises the challenge that climate change presents meaning that that development will be required to contribute to both mitigating and adapting to climate change. Farmers and land managers are uniquely placed to help provide solutions to climate change. This includes undertaking activity such as tree planting which will sequester carbon but also to provide renewable energy through

wind, solar power and anaerobic digestion. Planning policy should look to facilitate on farm renewable energy projects and not act as a barrier to them.

Policy DC3 outlines the proposed approach with respect to Green Infrastructure. It states that “The Council will work with partners to strengthen and expand the network of ecological sites, corridors and stepping stone habitats” and highlights a number of ambitions including to secure a net gain in biodiversity, to expand tree cover in appropriate locations across the Borough, to help adapt to flood risk and mitigate the impacts of climate change and to contribute to the wider regional nature recovery network of wetland sites by enhancing the wetlands across Warrington. However it must also be recognised that this green infrastructure also represents some of the most productive agricultural land in the country and is critical to domestic food security. Farmers and land managers are uniquely placed to help the council achieve many of its objectives in these areas, be that through carbon sequestration, habitat creation and contributing towards natural flood management solutions. However, policies need to be balanced with the need for agricultural businesses to keep producing high quality safe food which will remain the core of activity of agricultural enterprises within these areas. Policies that underpin and support the profitability and sustainability of the core farm business are the key to unlocking all of the other outputs around biodiversity, wildlife and climate mitigation that farming can offer. This is also recognised by the council’s desire that planning policy should protect the best and most versatile agricultural land.

Policy ENV2 highlights policies with respect to Flood Risk and Water Management and states that “Development should be focused towards areas at the lowest risk of flooding from all sources.” Across the region as a whole, an increase in the number of extreme weather events has meant that the existing field drainage systems have struggled to cope with the amount of water which is now draining through the system at times of peak flow and caused the fields to flood. Building developments are adding to the issues that they are facing. There has been a considerable amount of development in Warrington recently at a time when more extreme rainfall events are becoming more common. These developments lead to a reduction in the water carrying capacity of the green spaces and increase the rate of water runoff from these developments into the farmland drainage system. As a result, even more pressure is being placed on the system which is meaning that urban water is finding its way into farmers’ fields and causing crop losses. Therefore a condition should be placed on the developers to make sure that any development does not increase the flood risk of neighbouring farm land. This should include a requirement that a significant investment is made in upgrading the sewer system to cope with the extra demands being placed upon it and that a contribution is made to the maintenance of the farmland drainage channels which are receiving this urban water.

With respect to flood mitigation, the new ELM scheme is based on a principle of public money for public goods and the role that agricultural land can play in flood mitigation has been recognised. Many activities on farm can help alleviate flooding downstream such as reducing soil compaction, tree planting and increasing soil permeability. Larger schemes may be able to be developed which involve storing water temporarily on agricultural land. These schemes should be developed in partnership with farmers and should also be properly funded. It is particularly key to developing approaches whereby farmers are paid to maintain NFM assets on their land which benefit downstream communities and that the liability for these structures is addressed, in the event that they fail to operate in the way they are intended to do so.

Finally, as a wider point, the management of water for flood risk should be integrated with the management of water as a resource. The NFU states in its recently published Integrated Water Management Strategy “Water – whether we mean too much, not enough, or the quality of water – needs to be managed holistically. Agriculture has an important role to play in the

sustainable use of water.” We have seen situations where areas which were flooded are short of water within months. Policy developed to deal with flooding should look to integrate with policy looking to build water resilience. Policies developed by Warrington Borough Council, particularly planning policy, should look to support investment and development which delivers for flood mitigation as well as business water resilience.

Policy INF3 details policies with respect to Utilities, Telecommunications and Broadband and highlights the importance that digital connections are increasingly important to every aspect of our lives. However much of the focus has been on delivering high speed broadband to towns and villages while farmers themselves still suffers from very poor broadband service. In a recent survey of NFU members only 17% of those surveyed receiving a reliable mobile signal in all locations on farm, and 45% still did not having access to sufficient broadband speeds. Better coverage is required to support farmers to maximise the opportunities that digital technology can provide for their businesses and to improve productivity.

Thanks

Adam Briggs

[Redacted signature block]



[Redacted text block]

[Redacted text block]

[Redacted text block]

