

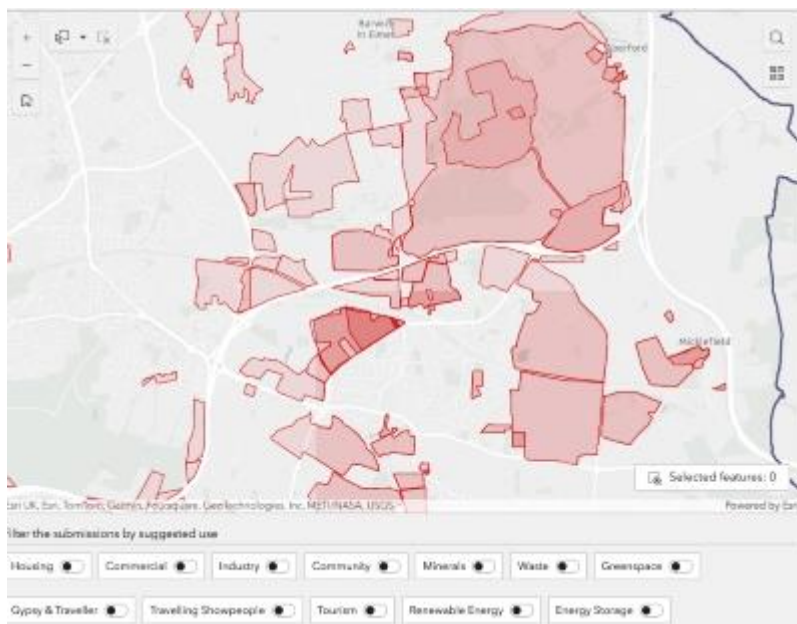
## Garforth Neighbourhood Planning Forum

Dear Member,

Leeds City Council are preparing their next **Leeds Local Plan 2040**, and although this seems far in the future, this plan is progressing quickly.

<https://www.leeds.gov.uk/planning/planning-policy/leeds-local-plan-2040>

However we are now back to the situation ( as in 2015) where LCC has already made a 'call for sites' and virtually every field around Garforth has been submitted for possible development. See map below



In addition to the unacceptable pressure that further large development would bring to Garforth eg. Health, education, road congestion, we are concerned about the potential loss of good quality agricultural land – Best and most versatile (BMV) which surrounds Garforth. In our Neighbourhood Plan [www.garforthplan.co.uk](http://www.garforthplan.co.uk) we identified all this BMV land which runs north/south on the eastern side of the city.

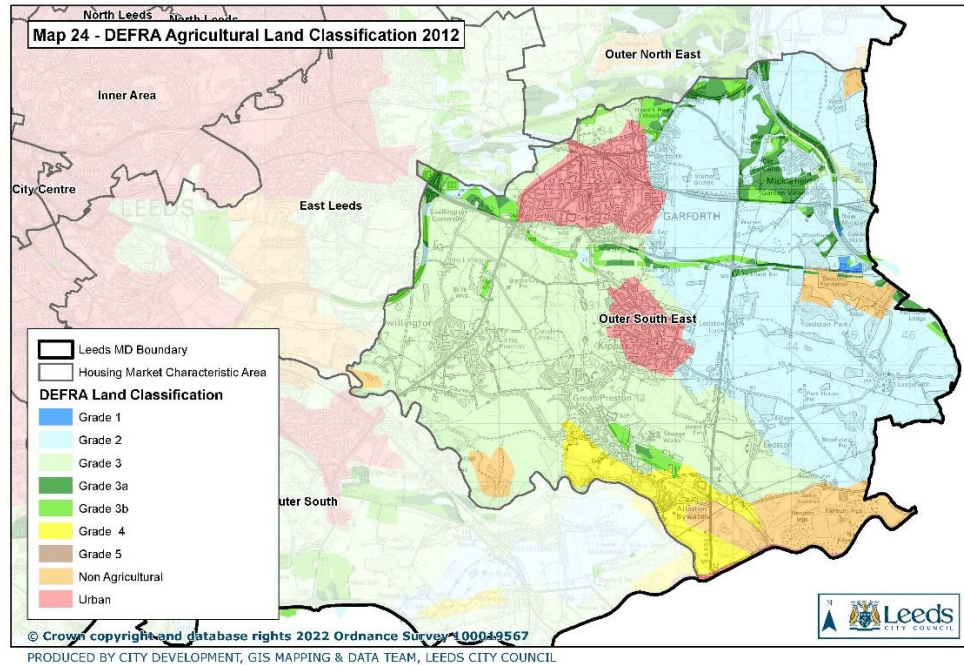
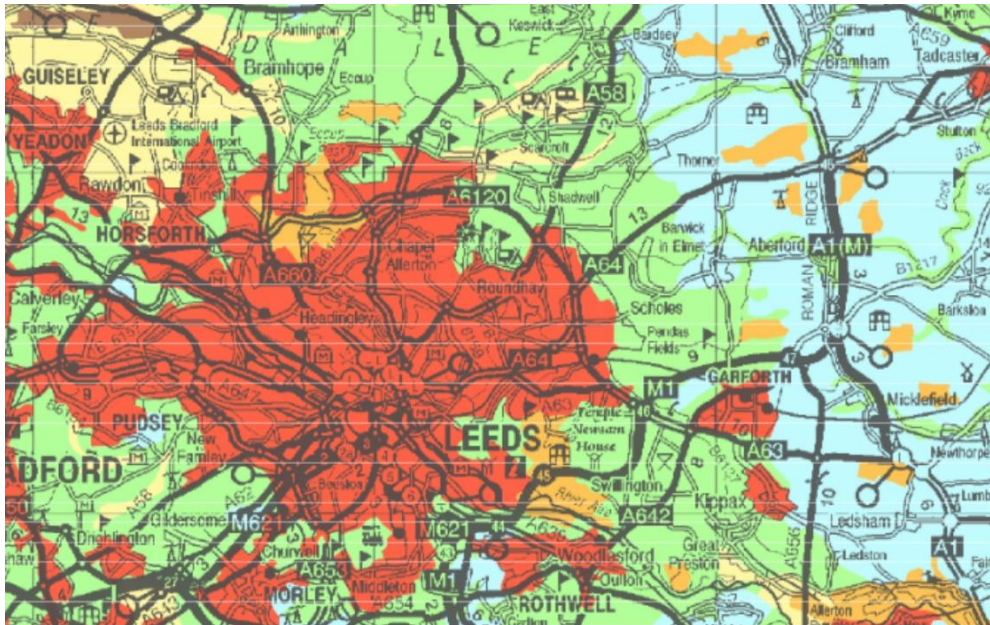
There is now a consultation underway to review the National Planning Policy Framework ( NPPF ) <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

and it is proposed that the following text be removed ( See Appendix A )

‘The availability of agricultural land used for food production should be considered, alongside other policies in this Framework, when deciding what sites are most appropriate for development.’

The reason given is that ‘it gives no indication of how authorities are to assess and weigh the availability of agricultural land when making planning decisions’

The rationale for this decision is an unbelievable statement and it is disingenuous to suggest that qualified planning officers working in local authorities are unaware of the numerous sources available ( See Appendix B ).



These maps show farmland quality around Leeds in general and Garforth in particular. There is no grade 1 agricultural land (the very best) in this area but, the pale blue is grade 2 and green is grade 3. We strongly believe that our best quality farmland should be protected from housing and commercial development.

So, in answer to questions 82 and 83, we propose:-

*Q82: Do you agree with removal of this text from the footnote?*

No, we do not agree with the removal of this text which was only inserted into the last NPPF review in December 2023 in order to maintain current UK food production and prevent further BMV loss. There is no justification for the removal of this text based on the argument given in paragraph 21 *'but it is less clear that December's additional text provided a material benefit – especially as it gives no indication of how authorities are to assess and weigh the availability of agricultural land when making planning decisions'* is completely inaccurate given the numerous national reports, guidelines and maps available in which to assess BMV land ( Appendix B ).

*Q83: Are there other ways in which we can ensure that development supports and does not compromise food production?*

Given the serious global uncertainty, the reliance on food imports and the increased population the UK cannot afford to lose any more BMV land. Various proposals to reduce meat consumption will only increase the demand for BMV land as cereal and other crops require better quality agricultural land for food production .

This additional text in question should remain and actually be a separate paragraph to emphasise the importance protecting BMV land for future generations.

Accepting the need for more homes does not have to mean destroying BMV land, as once developed can never be regained. The Office of National Statistics reported from the 2021 census returns that there are more than 1.4 million dwellings than there are households. Planning policies could ensure empty properties are brought back into domiciliary use along with vacant office and retail buildings. Action on empty homes <https://www.actiononemptyhomes.org/> highlights this wasted housing stock and we cannot afford to waste homes.

One can only presume that this proposal to remove this text is to facilitate development on BMV land even though paragraph 21 ( Appendix A ) states ' that food security is important for our national security and safeguarding BMV land is an important consideration'

The UK Food Security index 2024 <https://www.gov.uk/government/publications/uk-food-security-index-2024/uk-food-security-index-2024#:~:text=Production%20was%20at%2060%25%20for,mitigates%20national%20risks%20to%20supply> states that the ' UK relies on imports for roughly 40% of its food and that strong production mitigates risks to supply'. It also states that in 2023 ,17 million hectares of BMV land was used for agricultural production, a decrease of 2.2 % from 2022. This is a broadly stable trend consistent with previous years'

## **How can the country afford to lose over 2% of its agricultural land every year?**

If the government is honest about ensuring there is food security for the UK, and given the global insecurity then no more BMV land should be lost.

**Although we will be responding to all of the 106 questions we are asking you as Forum members if you could respond to this consultation .** The more responses that are received on this question may help to ensure protection of BMV land for future generations. Should you wish to use it a suggested template letter can be found after the appendices.

**Please share this with family and friends Thank you.**

### **Email to:**

[PlanningPolicyConsultation@communities.gov.uk](mailto:PlanningPolicyConsultation@communities.gov.uk)

### **Write to:**

Planning Policy Consultation Team  
Planning Directorate – Planning Policy Division  
Ministry of Housing, Communities and Local Government  
Floor 3, Fry Building  
2 Marsham Street  
London  
SW1P 4DF

**The consultation closes at 11.45pm on the 24<sup>th</sup> September 2024**

## **Appendix A**

### **Availability of agricultural land for food production**

20. In December 2023, a footnote was added that made the availability of agricultural land for food production an explicit consideration in determining if sites are appropriate for development. This added to the existing NPPF expectation that planning policies and decisions should contribute to and enhance the natural and local environment by recognising the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land. Best and most versatile land is defined as grades 1-3a in the agricultural land classification.

21. We have been clear that food security is important for our national security, and that safeguarding Best and Most Versatile agricultural land is an important consideration. Prior to this addition national policy was already clear 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. This safeguard is important to retain', *but it is less clear that December's additional text provided a material benefit*



– especially as it gives no indication of how authorities are to assess and weigh the availability of agricultural land when making planning decisions.’ To avoid uncertainty, we are therefore proposing to remove the text added to this footnote in December 2023.

**22. We therefore propose removing the following text from the footnote:** “The availability of agricultural land used for food production should be considered, alongside other policies in this Framework, when deciding what sites are most appropriate for development.”

## **Appendix B**

1. Guide to assessing development proposals on agricultural land 2021  
<https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>
2. The Regional Agricultural Land Classification Maps  
<https://publications.naturalengland.org.uk/category/5954148537204736>
3. Agricultural land classification England and Wales 1998  
<https://publications.naturalengland.org.uk/publication/6257050620264448>
4. The British Society of Soil Science guidance document 2022 gives detailed validation processes [https://soils.org.uk/wp-content/uploads/2022/02/Assessing-Agricultural-Land-Jan-2022.pdf#:~:text=The%20ALC%20system%20\(MAFF%201988,England\)%20and%20Planning%20Policy%20Wales3](https://soils.org.uk/wp-content/uploads/2022/02/Assessing-Agricultural-Land-Jan-2022.pdf#:~:text=The%20ALC%20system%20(MAFF%201988,England)%20and%20Planning%20Policy%20Wales3)
5. Land research Associates <http://www.lra.co.uk/services/soil-survey-soil-mapping/agricultural-land-grades#:~:text=This%20is%20done%20using%20the,Grade%205%20being%20the%20lowest>

Suggested template letter page 5 , please add in your address etc.

Dear Team Members,

I am a resident of Garforth and am very concerned about the latest review of the National Planning Policy Framework. In particular Question 82 and 83 which asks

Q82: Do you agree with removal of this text from the footnote?

No, I do not agree with the removal of this text *“The availability of agricultural land used for food production should be considered, alongside other policies in this Framework, when deciding what sites are most appropriate for development.”*

This additional footnote was only inserted into the last NPPF review in December 2023 to maintain current UK food production and prevent further BMV loss. There is no justification for the removal of this text based on the argument given in paragraph 21 which suggests that there is no indication/ information on how the local authority are to assess and weigh the availability of BMV land .

This argument is completely inaccurate. There are numerous national reports, guidelines and maps available in which to assess BMV land which include

1. The Government Guide to assessing development proposals on agricultural land 2021
2. The Government The Regional Agricultural Land Classification Maps ( DEFRA)
3. The British Society of Soil Science guidance document 2022 and gives detailed validation processes
4. Land research Associates has produced agricultural land classification maps for England and Wales

The reason given for this deletion is inaccurate and it is disingenuous to suggest that qualified planning officers working in local authorities are unaware of the above documents and guidelines.

The additional text in question should remain and actually be a separate paragraph to emphasise the importance protecting BMV land for future generations.

*Q83: Are there other ways in which we can ensure that development supports and does* Accepting the need for more homes does not have to mean destroying BMV land, as once developed can never be regained. The Office of National Statistics reviewing the 2021 Census returns reported that there are more than 1.4 million dwellings than there are households. Planning policies could ensure empty properties are brought back into domiciliary use along with vacant office and retail buildings. Action on empty homes <https://www.actiononemptyhomes.org/> highlights this wasted housing stock and we cannot afford to waste homes.

Kind regards