



SALTFORD PARISH COUNCIL

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10 February 2025

Rt Hon Angela Rayner, MP
Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government

Dear Angela Rayner,

New housing without compromising food security and nature

At its meeting on 4th February 2025, Salford Parish Council resolved to write an open (public) letter to you raising our concerns that the Government's planning policy for building 1.5 million new homes has potential to cause considerable long-term harm to the nation's food security, economy and natural capital. In particular, the harm to food security is likely to have disastrous consequences causing future hardship and food poverty for those on lower incomes.

Salford Parish Council sets out in the attached 2-page annex the cause for our concern, and why there is no need or justification for building any new homes, including affordable homes, that the nation needs on the Green Belt and/or farmland; indeed, to destroy that priceless national resource would be unwise and represent irresponsible stewardship of the nation's land and natural capital.

The Parish Council therefore respectfully requests that the Government makes an unequivocal policy statement, that overrules any interpretation of the National Planning Policy Framework (NPPF, December 2024) and related planning policies, that *"no undeveloped land in the Green Belt and/or farmland during the current Parliament shall be permitted planning permission, including on appeal to the Secretary of State, for building new homes to meet national or local housing targets set by HM Government or Local Planning Authorities"* and that existing planning permissions for new housing developments that remain unbuilt (one million according to www.planningportal.co.uk, 5.12.2024), should be completed or well advanced by 2029, with steps taken by Government, as necessary, to make that happen.

The Parish Council would welcome your response to our request that the Green Belt and farmland be protected from future development, and to the points we raise on the dangers to the nation's health and well-being as described in the attached evidence-based annex. We ask that the Government's forthcoming land use framework arising from its "Land Use Consultation" launched on 31st January will take account of the points made in this letter and annex to protect nature and food security; we agree with the consultation's opening statement that land is our greatest natural asset. Representatives of the Parish Council would be pleased to meet you to discuss the issues raised in this letter.

Our younger generation will not thank this generation if we reduce the nation's food production capacity at a time when imported food is expected to become increasingly scarce and expensive. If the Government allows the planning system to compromise the resilience of the nation's indigenous food supply, we all lose out!

Yours sincerely,

Saltford Parish Council

This letter (and annex) is copied to Steve Reed OBE, Secretary of State for Environment, Food and Rural Affairs (via MP for NE Somerset & Hanham); Dan Norris MP for NE Somerset & Hanham; Cllr Kevin Guy, Leader of Bath and North East Somerset (BaNES) Council; Tom Bradshaw, President of the NFU; Mary-Ann Ochota, President of the CPRE; and national news media.

ANNEX to Saltford Parish Council's letter of 10.2.2025 to the Deputy Prime Minister

Introduction

The Government's target to build 1.5 million new homes by the end of the current Parliament in 2029 and the new National Planning Policy Framework (NPPF December 2024) could make it easier to build housing developments on precious green field and Green Belt and/or farmland to meet new statutory housing targets.

According to the Home Builders Federation (December 2024) the UK does not have enough construction workers to meet the Government's target of building 1.5m new homes by 2029, whilst the Employer Skills Survey 2022 (gov.uk) found that the proportion of vacancies that were hard-to-fill due to skill shortages (SSV density) was highest in the construction sector.

Whilst developers have opportunities to develop on greenfield rather than brownfield sites they will. Greenfield development is less complex and more profitable for the developer than developing brownfield sites and developers are likely to cherry-pick greenfield sites in areas where resale values are highest and not necessarily where the houses would be close to employment opportunities etc., leading to increased car journeys and negative impacts on the environment etc.

Furthermore, many developers have a significant portfolio of consented undeveloped brownfield schemes but continue to develop greenfield sites wherever possible; the Government is right to have a "brownfield first" priority, but there needs to be safeguards to ensure greenfield sites are not developed whilst brownfield sites remain undeveloped.

Where developers submit planning applications for new housing developments on the Green Belt or farmland, including where the Local Planning Authority is failing to meet its annual housing target, the Government should support the LPA or local community in resisting and refusing such developments. Furthermore, there exists significant redundant brownfield on the MoD estate where new communities in the form of Garden Towns and Villages etc. could be built close to existing transport nodes.

The following provides the evidence-based case for why there is an urgent need for the Government to protect the nation's Green Belt and farmland from housing development. It does not seek to justify or criticise the 1.5 million homes target but makes the case for building new homes in the right places and not compromise the food security, health and well-being of the nation and its natural capital.

1. There is no need or justification to build any of the UK's requirement for new homes in the Green Belt and/or on farmland for the following reasons:

There are almost 700,000 empty and unfurnished homes in England. Of those, 261,471 are classed as "long-term empty," meaning no-one has lived there for six months or more (source: [Ministry of Housing, Communities and Local Government](#) data, 2024).

Together's (togethermoney.com) analysis of Census and Local Authority data revealed that as of 2023, there was a total of 1.55 million residential homes worth £532 billion that stand empty across England and Wales. That alone equates to the Government's new homes target for the next 5 years.

England has enough brownfield land for 1.2 million new homes (source: CPRE, December 2022).

According to "Planning Portal Weekly News" (www.planningportal.co.uk, 5.12.2024), the Market Index Report shows that over **one million homes with planning permission remain unbuilt, i.e. two thirds of the Government's 1.5 million new homes target.**

We need to use the housing we have better. According to ONS data and CPRE (October 2024) in 1971 there was almost one dwelling for every 3 people in the country. Today, there is about one dwelling for every 2.25 people, meaning we have more homes per capita right now than we did 50 years ago. Furthermore, the Action on Empty Homes (www.actiononemptyhomes.org) analysis of council tax data found that the total number of empty and second homes equated to 1 in 25 homes across England in 2024.

2. Ecology, health & well-being on the decline:

There has been a 73% average decline in monitored vertebrate wildlife populations (mammals, birds, amphibians, reptiles and fish) worldwide in the last 50 years (source: WWF's Living Planet Report, October 2024).

The UK is one of the world's most nature-depleted countries being in the bottom 10% globally and last among the G7 group of nations (information source: Natural History Museum's Biodiversity Trends Explorer report, October 2021).

Building on open countryside in the Green Belt reduces the quality of life for rural and city dwellers. The countryside is important for our mental and physical well-being. We should protect the Green Belt not just for rural residents and for wildlife, but for those who live in local towns and cities and appreciate being able to get out to open countryside relatively quickly.

3. Food security at risk:

The UK needs to be much more resilient with its food supply and cannot feed itself now; 40% of our net food requirement is imported each year (data source: Defra).

81% of BaNES (Bath and North East Somerset) is farmland compared to a UK figure of 71%. So, BaNES, for example, does and can make a useful contribution to the nation's food production.

Climate change reducing productivity for large areas of food production and causing crop failures, a rising world population, and conflict means that the UK with its own rising population cannot rely on other nations to feed us at current rates for much longer.

Food systems depend on a reliable source of freshwater. Half the world's population already faces water scarcity, and that number is set to rise as the climate crisis worsens (source: Global Commission on the Economics of Water report, 17 October 2024 [watercommission.org](https://www.watercommission.org)).

At present, over half of the world's food production comes from areas experiencing unstable trends in water availability. More than half the world's food production will be at risk of failure within the next 25 years (by 2050) as a rapidly accelerating water crisis grips the planet, unless urgent action is taken to conserve water resources and end the destruction of the ecosystems on which our fresh water depends (source: Global Commission on the Economics of Water report, 17 October 2024 [watercommission.org](https://www.watercommission.org)).

Losing agricultural land and land that provides ecosystem support for food production (e.g. pollinator habitat) is a short-term approach with irreversible longer-term consequences for our food security and higher food prices causing severe hardship for those on lower incomes.

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