

The Sustainable Soils Alliance (SSA) was launched in 2017 to address the current crisis in our soils. Its aim is to campaign to restore UK soils to health within one generation by seeing soil health elevated to where it belongs as a priority alongside clean air and clean water. The SSA is a non-profit organisation (CIC number 10802764).

Response to the:
Planning for the Future consultation.

At the SSA parliamentary launch, attended by Michael Gove, when Secretary of State for Environment Food and Rural Affairs, he quoted President Franklin Roosevelt to point out that "A nation that destroys its soil, destroys itself", he committed and empowered the SSA to hold the government to account in its commitment to deliver soil health.

Primarily I note that the soil, which is a fundamental national asset is notably absent from any consideration of PFTP.

The ambition of the SSA is to restore soils to health within one generation working with government, science, industry, public interests with neutral authority to provide a platform to deliver sustainable solutions.

- This generational ambition is in line with the government's ambitions in Defra's *A Green Future: Our 25 Year Plan to Improve the Environment* (25YEP) to improve soil health with a milestone when all of England's soils are to be managed sustainably by 2030.
- The SSA has worked with stakeholders to successfully ensure soil health is at the heart of the Agriculture Bill 2019-2020 – valued as a public good.
- *The Environment Bill - environment targets (October 2020)* recognises the need to improve soil health as 'one of our greatest natural assets' that underpins food production, biodiversity, nature restoration, carbon storage and flood protection.
- The government therefore recognises that to achieve these objectives, there is a need to develop a future healthy soil indicator to inform the development of the condition of soils indicator if soils targets are to be delivered and for better understanding how land management practices impact soils ability to deliver environmental benefits.
- The Environment Agency (EA) *The State of the Environment: Soil report (2019)* recognises the fundamental role of soil health
- The EA report points to a soils crisis with 2.9 million tonnes of topsoil erosion loss p.a. in England and Wales and with 2011 estimates of soil degradation costs equivalent to a conservative £1.2 billion p.a.
- Defra (2019) *UK Statistics on Waste* identifies 28 million tonnes of soil were sent to landfills in 2016 representing 58 million tonnes.
- *Climate Change Committee Report (2018)* notes net zero target depends on soil recovery given soils immense capacity for carbon storage (equivalent to 80 years annual GHG emissions) and calls for new land use policy to deliver climate mitigation and adaptation objectives with *IPCC special report, Climate Change and Land* identified soil carbon increase among the most significant climate actions in the land use sector.

So soil health is on the government agenda with Defra, CCC, the Agriculture and Environment Bill.

But the Planning for the Future (PFTF) white Paper 2020 has no soils mentioned, over 100 references to land but none to soil. What does the gaping soil blindness in the PFTF mean?

PFTF policy objectives cannot be achieved without understanding the implications of soil degradation, soil protection, the importance of soil health and the need for planning policy to address soil recovery and sustainable use.

- It means that as the white paper stands, the planning system will work against all the genuine government commitments to soil recovery – there are noble words and aspirations in the ambitions of PFTF but no proper understanding of how sustainability can be achieved.
- PFTF identifies the importance of a planning system that is fit for purpose and recognises the National Planning Policy Framework's (NPPF) in the context of reformed planning potential to address climate change mitigation and adaptation and facilitate environmental improvements.
- PFTF talks of the planning system giving confidence in future growth of areas for the delivery of beautiful and sustainable places – this comes across as a hollow vision as it is not founded upon the soil upon which everything depends and is linked – land is everywhere in the document – but land is soil.
- PFTF points to the requirement for land to be available in the right places for the right form of development and for land use planning and for development control to ensure natural assets are preserved and to support net environment/biodiversity net gains
- PFTF states the planning system aims to include government policy objectives to combat climate change and maximise environmental benefits. Unless soil health is taken into account, The planning process will work against fundamental agreed soil policy objectives.

The SSA recognise that there are policies in place dealing with contaminated land, urban drainage and inappropriate development in areas of high risk of flooding. However, there remains a planning policy void in dealing with soil health including soil carbon, soil structure and soil biodiversity.

Some of the issues related to development that need to be included in future planning policy :

- Inappropriate development on soils with high carbon (such as on peat and peaty soils, e.g. wind farms, roads)
- Inevitable degradation of soils by deep compaction with little attention to restoration (e.g. housing development and aftercare)
- Inappropriate soil handling
- Poor soil quality in green urban spaces and missed opportunity to ensure fully functioning soil
- There is a lack of skills and capacity across all sectors dealing with soils

So what is to be done?

- Standards on soil health are non-existent.
- Construction activities need to prevent and remediate adverse impacts on soil including soil compaction, reduced drainage capacity, contamination, reduction or loss of soil biota and general loss of soil function.
- The new planning vision must ensure that planners, designers and the development industry are aware of the many benefits of appropriate and considered soil management and the need and methods for soil management and recovery in the development process.
- The construction industry in general needs to be encouraged (and assisted) through enlightened self-interest in reducing the long-term adverse impacts from poor soil management and the detrimental impacts of poor soil management on natural capital, public goods and ecosystem services and the wider long term environmental benefits from good land use management.
- To meet government 25YEP sustainable soils targets, a soil health strategy is needed across all land uses (urban, rural, forestry and agriculture).
- It is essential that planning ensures that there is an up-to-date construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- Governance on soil health needs clarity and coherent stakeholder involvement.

- Clear responsibility for soil health is needed through Local Authorities, Environment Agency and Natural England collaboration and involvement.
- In order to protect soil health we need clear assessment procedures and standard benchmarks in development and planning on soil health in the whole soil profile, not just topsoil to avoid a veneer effect.
- Training programmes on soils need to be developed for all involved in delivering sustainable development.

How is this to be done?

- The Sustainable Soils Alliance could act as focus on soil bringing various sectors together to develop common purpose for soil health in the new planning vision. We would welcome discussions on how this might be done.