

HELLINGLY NEIGHBOURHOOD DEVELOPMENT PLAN

TOPIC PAPER NO. 6

FARMING IN HELLINGLY

Author: Gill Hesselgrave, April 2017

Hellingly Neighbourhood Development Plan – Farming in Hellingly

Introduction

My name is Gillian Hesselgrave and I have been asked to write this report. I feel my background enables me to undertake this.

I have been involved with farming since 1960 and farming with my husband at Stone House Farm, Hellingly since 1971. We ran a dairy and beef herd, but are now semi-retired and only running a small beef herd and selling our grass to another dairy farmer in Herstmonceux Parish. We are members of the National Farmers Union and I have worked with them on promotions to arouse public awareness. We also worked for many years with St Bedes School to provide practical experience for their Agricultural and Environmental GCSE subjects and also their BTEC and NVQ courses run in conjunction with Plumpton College. I trained as a D32/33 Assessor for NVQ. I also received the Farming Woman of the Year Award for the South East in 2000.

I have been a Hellingly Parish Councillor since 1996 and on the Planning Committee since 2004, so have seen the applications come in over the years and how they have been received and dealt with.

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Farming in Hellingly

1. Farming in Hellingly is subject to several constraints, historical and physical amongst others.

Physical – The Geology

2. Much of the land is Weald clay and is Grade 3, which is highly permeable and often susceptible to flooding. There is some flat land which is Tunbridge Wells Greensand.
3. The Cuckmere River runs through the parish, which has deposited silt in some areas but these areas are also subject to flooding and are, in fact, a Flood Plain.
4. We are in the dry South East where our average rainfall is well below other good farming areas. Without plentiful rainfall crops and grass don't grow, which reduces productivity. However, we also have high Ground Water Levels.
5. We are also cut-off from major transport links, so moving animals around is not always easy. It is more difficult to transport animals north of London where many markets and fattening units are.

The History

6. In the Middle Ages this area was mostly covered by woodland. Much of it was hornbeam, which was coppiced to provide charcoal for the iron industry.
7. Farmers drove their pigs into the woods in the autumn to eat the acorns. After a while some of them made settlements and fenced off areas that worked with the landscape. This resulted in a patchwork of small irregular fields. However, small fields mean more hedgerows which are an ideal habitat for small mammals, insects and birds. Much of modern farming requires large, regular shaped fields, unlike many of our small ones.
8. Historically we have had a cattle market in Hailsham since 1252, when it was in the High Street. The finished cattle and dairy side of farming have been in decline for many years, although store bullocks (i.e. yearlings) and sheep come in larger numbers, many from West Sussex. The next viable market is at Ashford, which is again difficult to access by road. Thirty years ago the vet practice in Hailsham had 45 dairy herds on its books, now it has only one and the goodwill is being sold.
9. With the coming of the Common Market, the country was told it could not continue to have a Milk Marketing Board as it was a monopoly and must be broken up. The result of this was that the supermarkets gained enormous power and often sell milk at below cost as a loss leader. They often pay well below the cost of production and, in fact, milk is cheaper than bottled water. Pressure was on to increase the size of dairy herds.
10. In the 1950s and 60s there were numerous small herds of between 8 and 20 cows. These became unviable and herds increased to between 60/100 cows. Over time even this was not enough and farmers ceased milk production in the area. Today there are no dairy herds in the parish. The lack of dairy herds resulted in a lack of

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cross-bred calves for beef production, so this sector also went into decline. There are very few holdings in the parish that now have bovine animals.

11. The buildings associated with animal production are often unsuitable for modern farming practices and many are in poor state of repair.
12. The lack of these herds created a vacuum. Farmers were told by the government of the day to diversify. They were also paid by the EU to take land out of production. There are many acres in the parish which are not farmed – they only need to be capable of being brought back into production if need be.
13. As a result of Brexit this may not be an option after we leave the EU. Some of the larger units are now rented by farmers from outside the parish as subsidiary land to enable their business to work on a larger scale.

Economics

14. The above factors have a huge impact on the profitability of farming in the parish. Most of UK farming relies on EU subsidies for about 60% of its cash, so I believe the percentage would be even higher here.
15. The smaller farms have no hope of turning a profit and it has been necessary to find other sources of income through wives working, farmers working off the farm and becoming part-time or diversification. Many have been bought by people outside the farming community who want to live in a property with land around it. Very often they only want someone to keep the land tidy.

Farming Activities in the Parish

16. **Dairy** – no farms left in the milk business, only land let to producers outside the parish to enhance their own holdings.
17. **Beef** – This has also declined. Farms still involved are – Park Farm, Knightsbridge Farm, Stone House Farm and Knights Farm. These are mostly suckler herds. Owing to the lack of cross-bred dairy calves there are no longer many calves reared or stores bought in to finish.
18. **Pigs** – For many years few pigs have been reared in the Parish, and the only producer now is the Hackhurst Lane Piggery.
19. **Poultry** – There are no large-scale units in the parish.
20. **Arable** – The amount of arable land is decreasing with the large-scale housing developments taking up much of the best flat land. Crops are still grown at Broad Farm, Land opposite Blackstock Farm, the brickworks land off the A267, Park Farm and Shawpits Farm, Grovebridge Farm and Sussex Nurseries (the latter is subject to a Planning Application to come shortly). Much of this land is farmed by farmers from neighbouring parishes. In the past, some farms grew a few acres to feed their own animals with, but this has ceased except for Park Farm.

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21. **Sheep** – The main livestock enterprise in the parish. There are some local flocks but also in the winter “keeper” sheep are brought in from areas like the marshes, which become too wet. Also, sheep farmers often like to keep their own grass fresh for the spring lambing. Sheep have a big impact on keeping the countryside as we like to look at it.
22. The future of the sheep industry is in doubt following Brexit. Much of the meat goes to Europe and if we are out of the single market and face tariffs they may well become uneconomical.
23. **Vineyards** – We now have one vineyard in the parish, which should start producing wine in the next couple of years. This is a new enterprise in the parish. English wine has “taken off” in the past few years and the sparkling varieties stand up well in competition with champagne. It is relatively expensive, but a growing market. To set up a vineyard a large amount of start-up capital is required and it is five years before a return is seen.
24. Most vineyards employ seasonal labour, many from Eastern Europe and there is concern with Brexit as to whether this labour supply will be available in the future.
25. **Horses** – Unless they are heavy horses they don’t actually count as agriculture. We have a fair number of horses in the parish including livery stables – Fontmills, and a stud farm at Lattenbury.
26. **“Pick your own” and soft fruit** – we have one farm undertaking this on Coldharbour Road.

Diversification

27. Diversification has taken many forms by different farmers, i.e.:
 - Industrial Units** – from redundant farm buildings. Planning permission is needed for this and has not always been easy to obtain. These units are usually cheaper than on purpose built industrial estates and so have an appeal for “start-up” businesses. Examples: Broad Farm and Park Farm
 - Farm Cottages** – have been sold off or let, although this can be a problem if they have an Agriculture Tie linked to the farm. They can be let to other people in the industry, but with hardly any cattle, there are no jobs and little demand. It has not always been easy to get the Tie removed through the planning system.
 - Bed and Breakfast** – Some farm houses are large enough to offer this, but nowadays standards are very high and en-suite rooms essential. There are few in the Parish.
 - Holiday Cottages** – are another use for redundant farm buildings but it has been difficult to obtain permission in the past, or even to put up purpose built cabins. One particular farm in the parish had the support of the Tourist Board for about 3 cabins, but Wealden District Council turned it down. Again, there is an inbuilt opposition to this type of diversification. There is a shortage of holiday accommodation in the area, and one would think with the introduction of the South Downs National Park on our doorstep this would increase.
 - Campsites** – we have recently had a new campsite opened in the parish at Fontmills Farm, which has proved there is a need because it has been heavily booked.

Wealden District Council only gave permission for a trial period of 3 years. If someone is to plough capital into a project for the future, they need more certainty than this. It is a short-sighted policy.

Livery Stables – there has been an opportunity here, but in the past the Parish Council attitude has been “we don’t mind stables, but only for personal use, not livery”.

Teaching Agricultural Science – worked well for some years, but now Health and Safety has made it difficult for teachers to bring pupils onto farms, so it is no longer attractive. Bedes School used our farm heavily for many years, but a change in policy has seen the end of all their rural subjects.

Farm Shops – These do work but there is over capacity. A shop that opened a couple of years ago, had to cease trading through lack of custom. It is easy for this type of enterprise to become saturated. Some produce is sold in a small way through the internet or to local contacts. In Hailsham, on the edge of the parish, there is a farm delivering organic raw milk, but they are now faced with their rented land being developed and will need to move the operation to survive. They rent organic land in Hellingly for forage and grazing young stock to supplement their holding. Ashurst Farm, Grove Hill supplies meat.

Meat Cutting Plant – Smithers Butchers have a meat cutting plant at Lyes Farm, North Street on the A267. They process carcasses for a wide area. When they opened, there was also a butcher’s shop, but this part of the business closed because it was not viable.

Outdoor Activities – There is a demand for these, but it is a limited market as you can’t have the same thing replicated in a small area. Included are:

Golf Courses – we have one – Wellshurst. There was planning permission for a second many years ago, but the financial climate changed and the demand waned.

Car Boot Fairs – not as popular as they were – Broad Farm.

Clay pigeon shooting – this takes place.

Paint balling – we have a centre on the edge of the parish- in Cinderford Lane.

Shooting – people shoot over the farms, but it is not an area where large shoots that rear birds take place.

Fishing – There is some fishing in the parish. It is difficult to get permission to create new fishing lakes as the Environment Agency prefers shallow scrapes for wildlife – Broad Farm.

Open farms- this can be popular but it is very time consuming to set up and to cope with Health and Safety regulations. You also have to have enough variety of animals for visitors to see.

Weddings and Event venues – these are popular. We have two in redundant farm buildings. There is probably no need for further expansion – Blackstock Farm and Park Farm. There are other venues in the parish such as Boship Farm and Wellshurst Golf Club.

Horse events – there is a wide variety of these which can be undertaken- Broad Farm.

Motor events – again there is a variety of possibilities. The Festival of Transport at Broad Farm.

There are obviously other possibilities not mentioned here. Many events are governed by the 28-day rule for events on agricultural land. (N.B. you will have noticed how many activities take place at Broad Farm, which is the largest farm in the parish and also on the A267 with extremely good access.)

Buildings Converted to Houses – Since 2012 the government has radically altered its stance on converting redundant farm buildings to domestic use. Before that the criteria, unless it was a listed building, was that you had to be able to prove that you had tried for business use with no success, before domestic use could be considered, unless it was a listed building – Listed Barn at Stone House Farm.

The new criteria are that it should be a substantial building capable of conversion. Wealden District Council has taken this a step further and said, if the environment would be enhanced by pulling down the old building and putting something ascetically better in its place and it is sustainable they will look at this favourably. However, it looks as though there is a change in thinking with the new Local Plan. It is very much wait and see at the moment.

There are numerous small holdings with redundant buildings, often in very bad state of repair. We have seen several of these come forward for planning permission in the parish. There is still great local opposition to this policy and the plans will be rejected wherever possible.

If the small farms survive they will need to be able to diversify and they need a climate much friendlier to new enterprises. In the past it has often been “how can we turn this down”, not “how can we support the project, which may well provide jobs”.

Cottages for Farm Workers – These are either needed for an extra member of staff or family to live on the farm, but much more common in our parish for someone who is starting up a livestock enterprise – usually sheep on a small holding. Permission for these has been difficult to obtain in the past. The criteria have usually been temporary permission for a caravan for 3 years to provide financial viability.

When applications have come in the past for agricultural cottages the criteria was that they must be small. Nowadays every family needs more space for modern life and just because they work on the farm they are no different from anyone else. Many of the small cottages on The Dicker, which were built for the potters in the past, have been extended as they are too constrained. Agricultural people don't need huge houses but they do need to be as big as those built for the rest of the community.

The new rules about converting buildings to residential use will help in many cases, but the capital may be hard to find.

NB the list of farms involved in various enterprises is not fully comprehensive

Value Added Products – this is an avenue to gaining larger returns from a product. However, it is necessary to have a product in the beginning. There may be future opportunities for this. Examples are:

Milk – selling milk off the farm, cream making, yoghurt making, and ice cream production. We don't have a milk herd and it is extremely unlikely that anyone will start one up in the future.

Pigs – direct selling and sausage production – again very small number of pigs.

Sheep – selling direct from the farm.

Poultry – free range egg production from the farm – again hardly any poultry.

Development

28. The large amount of development that has already taken place in the parish and that to come is taking a big toll on the best fields, with the result that there will be even less agriculture in the future.
29. In itself the large development will have a detrimental effect on farming in the parish. The loss of a large amount of land will put pressure on what remains. People who enjoy the countryside will have less area to use and this will put added pressure on the remaining land.
30. Detrimental effects are:
 - More dog walking which will inevitably lead to more sheep worrying by dogs. The largely urban population which will move in never believe that their dog will chase sheep, and they often let them roam loose with no idea where they are. There have been several sheep worrying incidents in the parish in the last few years and nationally the problem is growing. A ram was killed on our farm in 2016 resulting from a dog attack. There have been two attacks in the winter 2016/17 in the Parish. Sussex has more instances of sheep worrying than any other county and more than the whole of Scotland.
 - There are bound to be more incidences of people throwing their bags of dog waste over the fence or in the trees to be a hazard to wildlife and farm animals.
 - There will also be an increase of litter, which again is a hazard to animals.
 - Many of the urban population have no idea of how to behave in the countryside and still enjoy it.

Supporting Farming

31. At the meeting of farmers for the Neighbourhood Development Plan it was mooted that farm diversification should be encouraged, for this to happen there needs to be a change of attitude with planning.
32. It was also noted that if a house was needed for a young member of the family to live on site, this was extremely difficult to obtain. Also, many farms cannot afford a second family drawing on the income.

Flooding

33. As we all know, the parish is subject to flooding. There may be applications coming forward in the future to undertake small scale works to help the situation. These need to be looked at carefully. Natural England and the EA believe that a lot of small schemes can help as much as one large concrete flood wall.
34. We should also consider the effect of droughts on the parish, which have occurred in the past, and may well happen again with climate change. In fact, this winter has had very little rainfall, which bodes ill for the summer.
35. South East Water has a drought plan, a legal requirement (signed off by the Secretary of State) in the event that water levels are so low we enter a drought. Communities and businesses are being encouraged to be more efficient.

BREXIT

36. **Set Aside** –The EU has paid farmers to take land out of production and there are areas of this in the parish. This may not be an option in the future. These areas have provided an environmental habitat.
37. **The Single Market** – if we leave this there will be a big question regarding profitability, but at the moment we have no idea what will be put in place.
38. **The Single Farm Payment** – This money can be claimed by farmers each year. It is paid per hectare and there are many conditions attached. It is the backbone of most of the enterprises. There is no guarantee that the British government will continue to support farming in this way, and it is unlikely that they will provide support at the present levels. In the UK the farming vote is small so we have little clout, unlike France. The support programme has been the same across the whole EU.
39. The environmental organisations are already demanding that support money should go to them and not supporting farming.
40. **Environmental Schemes** – there are also schemes in place where farmers are paid for the work they do for wildlife etc. Again, these will be altered or axed after Brexit. The lowest level scheme was popular for about ten years, but last year was replaced by a scheme with much more onerous conditions and the uptake was greatly reduced. This money pays for things like cutting hedges, planting wild flowers, keeping land in low production, planting winter forage crops for birds.
41. The UK government have also “gold plated” many of the EU schemes to make them less attractive, so they are unlikely to be generous in the future.

Conclusions

42. Large scale profitable farming is no longer viable in the Parish and likely to become less so with Brexit.
43. We have a landscape made up of small fields which need to be grazed to keep the character of the area and for environmental reasons. Most of this grazing is done by sheep.
44. A large proportion of the money for this has been via the subsidies generated from the EU Agricultural Policy. There is no guarantee that this money will be available from the British Government after Brexit in its present form and amount or even at all.
45. Farmers will have to look hard to find ways of keeping their holdings in good condition and to earn money from them. Diversification is probably the only way forward.
46. Much of the land is rented by farmers outside the parish to keep their enterprises viable.
47. If the Parish wants to keep the landscape we now have they will have to be proactive in helping farmers.

48. A large proportion of our bigger better fields are likely to be built over in the next few years.
49. The remaining fields will be under pressure from the new urban population.

Extracts from an NFU document supplied to Tonbridge and Malling Councils giving a high level overview. Items relating specially to Tonbridge and Malling have been omitted.

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Tonbridge and Malling Local Plan – Way Forward Consultation

The NFU is an industry representative organisation, which aims to safeguard the farming and growing business interests of our members and to promote conditions for the wider industry to retain a secure and competitive foothold in the UK and international economy. The NFU represents 47,000 farm businesses in England and Wales involving an estimated 155,000 farmers, managers and partners in the business: The large majority of commercial farm businesses in England.

Specific Comments

Paragraph 4.2.12, which encourages the reuse of redundant agricultural buildings to meet future industrial and office based needs. Given the inherent volatility in agricultural commodity prices and particularly the effects of sustained low prices that are often below the costs of production, many farms rely upon diversification to ensure their overall long term viability. In 2014-16 many purely agricultural enterprises were loss making such that the income from diversification and subsidy were often the only things keeping some farms in business. For this reason we would support a policy direction that enables landowners to make best viable use of redundant buildings by creating industrial and office space to enable the creation of jobs and growth in the rural economy. We believe this would underpin the farming sector and by implication our ability to produce sufficient food for a growing UK and international population. In this context we would also support and encourage the Council's efforts to secure delivery of fibre broadband in all rural areas without any further or unnecessary delay. On the availability and roll out of rural broadband, the NFU has recently undertaken a comprehensive survey, the results of which are compiled within a report appended to this response. We support recognition within your consultation document that rural economic development is entirely bound with the availability of broadband in providing the platform for knowledge based and service based rural enterprises.

Given the broad scope of this consultation, the remainder of this response comprises a relatively high level overview in setting out the main planning considerations for different parts of the agricultural industry.

General Overview

Agriculture and horticulture have changed significantly in recent decades and will continue to do so to meet the needs of the market, the regulatory environment and a changing climate. Modern agriculture will continue to require development including new buildings for greater efficiency and to increase production, and respond to climate change, together with buildings and other structures to support renewable energy generation and other forms of diversification. These changes will also result in requirements for new dwellings and policy measures should be designed to allow this essential need to be realised.

Agriculture and horticulture help to realise the three dimensions of sustainable development as outlined in the NPPF: economic, environmental and social. Farming is an industry of national as well as local importance. It responds to the shifting needs of the market, embraces innovation and has a wider role to play within the economy.

Agriculture, Horticulture and the Economy

From the outset, we would like to highlight the solid growth potential that exists within the rural economy in general, and within productive farming industries in particular. UK agriculture's contribution to the economy increased by a staggering 54% between 2007 and 2012, driven in part by improving commodity prices during that period. Indeed, agriculture's GVA in 2011 and 2012 contributed an additional £8.6bn more to the UK economy between 2008 and 2012 compared to the previous five-year period. This is in contrast to the wider economy that experienced an ongoing economic downturn during the same period, shrinking by 7.2% during 2008-09. Whilst commodity values are no longer as buoyant, the reality is that the fields and farms of Britain have the capacity to yield impressive and resilient economic growth. Looking at the farming sector alone is only part of the story, and as a rule of thumb, for every £1 that farming contributes to the UK economy our food manufacturers and wholesalers contribute a further £5. Farming is the foundation stone of the UK's food and drink industry. Add in the value of its output and you are left with a total farming and food sector worth some £108bn, the equivalent of 7.3% of the GVA of the UK economy.

With approximately half a million farming jobs in the UK effectively underpinning a further 3.2 million jobs in the food services industry, we believe that farming and food production hold the key to a sustainable and prosperous rural economy. Together, farming and food have effectively formed an oasis of growth and potential at a time when the economy generally has been struggling. Recent GVA figures for the combined sectors show a 19% increase in the size of the agri-food sector compared to the pre-recession levels recorded in 2007, whilst the number of people employed in the sector in 2012 was 4.8% higher than pre-recession levels.

Food Security and Farming in a Changing World

Instability in world food markets has highlighted the question of where we source our food. Although we can never be totally self-sufficient, by boosting home production we can reduce our exposure to fluctuations in these markets. The world's population is set to grow to around 9 billion by 2050 and Britain's to 70 million by 2027. It is widely accepted that we need to significantly increase food production, in ways that make best use of

scarce resources and reduce harm to the environment: to produce more, but impact less. This is 'sustainable intensification'.

Sustainable intensification will also result in the need for development including changes to existing buildings or the construction of more modern, increasingly efficient buildings.

The agricultural industry is well-placed to perform a vital role in climate change mitigation and adaptation. Farmers will respond to changing weather patterns by means of different cropping regimes but they will also need to replace or adapt buildings and increase their water storage capacity. Farmers are acutely aware of their responsibility to manage water well. On-farm irrigation reservoirs, designed to capture water when it is plentiful and irrigate crops when it is not, have been built by some growers and will be needed by others.

Farming and Renewable Energy

Agriculture and horticulture have huge potential for generating renewable energy. The NFU fully supports the Government's renewable energy targets and we feel that all farmers should have the opportunity to produce clean energy commercially. Planning applications for field-scale solar PV have been common in the south east owing to the optimum levels of solar radiation in the area. Farmers have always produced industrial crops as well as food – for example fibres, biomass fuels, oilseed rape for biodiesel and poppies for pharmaceutical morphine. Renewable energy fits well into this range of non-food products. We are therefore generally comfortable with the use of agricultural land for solar panels, especially as the use is temporary, provides biodiversity benefits and long-term soil condition improvements, and does not preclude the subsequent return of the land to agricultural production.

The NFU is a strong believer that UK farms could be a major player in a shift towards a resilient, low carbon energy system, especially where this can complement or be undertaken alongside existing farm practice. We take substantial interest in the recent important report launched by the Farm Power coalition, which found there is at least 10GW of untapped solar resource across UK farms, equivalent to more than three times the installed capacity of the proposed new nuclear power plant at Hinkley Point C. If 10GW of solar power were ground-mounted (half the national ambition for 2020 set by DECC), this would occupy at most 25,000 hectares –just 0.14% of total UK agricultural area (18 million ha) with a negligible impact on national food security.

Agricultural Planning Outlook

Farms have over the past half century become increasingly specialised, and each sector has its own development needs. We have considered these and looked ahead several years to predict how those needs will change in the short to medium term.

We expect that:

- Existing dairy units may expand production relatively modestly
- Some larger buildings will be needed for beef cattle, in part to meet a need for Approved Finishing Units to help with the battle to contain the spread of bovine tuberculosis.

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- In the sheep sector, the demand for permanent buildings will diminish, though farmers will require more temporary buildings.
- There will be continuing investment in replacement poultry buildings; some larger buildings to increase production and meet the demand for high-welfare birds; and possibly an expansion of the free-range sector.
- Recent experience of bitter opposition to larger new pig units has discouraged others from following suit; we are more likely to see expansion of existing units.
- There will be increased demand for development of agricultural infrastructure on farms producing combinable crops and continued interest in new (and larger) replacement on-farm grain stores often incorporating renewable energy generation to meet on-farm heat and power needs.
- There will be continuing demand for very large and medium/large glasshouse developments, large-scale polytunnels, mushroom-growing structures, on-farm potato stores and vegetable packhouses – again, some incorporating energy generation.
- Although the agricultural industry is commonly perceived as a sector concerned solely with food production, many farm businesses have diversified into non-agricultural enterprises.

Diversification – such as tourism, sport, recreation and processing enterprises – offers considerable scope for improving the economic viability of farm businesses and meeting the diverse needs of rural residents and visitors.

Implications for planning policy

If sustainable intensification is to be achieved, planning policies will need to enable on-farm development such as changes to existing farm buildings or the construction of more modern, increasingly efficient buildings. There will be a continuing need for more modern, efficient and in some instances larger buildings and we need to see planning policies that acknowledge this in line with the National Planning Policy Framework. For farming to remain prosperous there will also be a need for further diversification. This is likely to include further vertical integration of the food chain, which will require a range of facilities such as pack houses, storage and food processing.

Another key area will be on-farm renewables, both providing farmers with energy and supplying the national grid. We expect a continuation of demand for farm tourism mainly in remoter areas and a greater focus on retailing and leisure close to the urban fringe. *“To promote a strong rural economy, local and neighbourhood plans should:*

- *Support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- *Support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations...*”NPPF paragraph 28.Regulations will continue to give rise to development requirements, and NVZs are a prime example of this. Local plan policies will need to be framed so that they can accommodate development – such as increased slurry storage – necessitated by regulation. **Changes in agriculture and horticulture give rise to changing requirements for residential accommodation to serve the businesses. The NFU recommends**

local authority's considering more of a flexible approach to policies on rural workers' dwellings to enable their development without unnecessary and costly delays.

The process of applying for planning permission can be made prohibitively expensive by demands for the preparation of reports and assessments that can have little bearing on the decision. It will be essential for LPAs to observe the requirements of the Growth & Infrastructure Act 2013 to avoid imposing unnecessary burdens on applicants.

It will also be vital to ensure that supportive planning policies are not undermined by Community Infrastructure Levy regimes that render agricultural and horticultural schemes economically unviable. Generally, such development does not generate demand for increased infrastructure in the locality, and margins are often so slim that even a seemingly-small charge would be enough to jeopardise it.

Finally, it will be important to ensure that policies for non-agricultural development that could damage the efficiency of the industry include criteria recognising the importance of protecting farming from undue interference and harm. If agriculture and horticulture are to remain competitive, meet the challenge of sustainable intensification, and comply with emerging regulations, planning policies will need to be flexible and framed so as to accommodate the changing needs of the farming industry.

Wherever possible, the planning system in our rural areas must be focused on accommodating change in agriculture and horticulture to meet the challenges of the 21st century. *"LPAs should avoid new isolated homes in the countryside unless there are special circumstances such as the essential need for a rural worker to live permanently at or near their permanent place of work in the countryside."* NPPF paragraph 55 *"LPAs should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. They should:*

- *Have a positive strategy to promote energy generation from renewable or low carbon sources;*
- *Design their policies to maximise renewable or low carbon energy development while ensuring that adverse impacts are addressed satisfactorily..."* NPPF paragraph 97 *"LPAs should design their policies to maximise renewable and low carbon energy development."* Planning practice guidance for renewable and low carbon energy, July 2013, paragraph 6 *LPAs should take into account the economic and other benefits of the best and most versatile agricultural land.* NPPF paragraph 112

In Summary

In our view planning policies will need to:

- **Embrace sustainable intensification, enabling development such as changes to existing farm buildings or the construction of more modern, increasingly efficient, and in some instances larger, buildings;**
- **Help our horticultural industry to reach its potential, with policies that are criteria-based rather than zonal, being prepared to permit large glasshouse**

developments and polytunnels, and in Green Belt applying only the tests relevant to agriculture;

- Continue to support farm diversification;
- Be framed so that they can accommodate development – such as increased slurry storage –necessitated by regulation;
- Enable a new approach to rural workers' dwellings, with a more positive policy where the business is well-established; and
- Protect farming from undue interference and harm from non-agricultural development.

It will also be vital to ensure that supportive planning policies are not undermined by Community Infrastructure Levy regimes that render agricultural and horticultural schemes economically unviable, or demands for costly reports and assessments that do not produce information essential to the decision making process.

Similarly, where permitted development rights are granted by the Secretary of State, we look to local planning authorities to exercise their prior approval powers responsibly in light of the fact that planning permission has in principle been granted already; it is important that the will of Ministers is not frustrated by attempts to prevent reasonable use of the rights. The NFU is keen to work with local planning authorities, by discussing topical issues and proposed policies with officers (and elected members); commenting on draft plans; showing groups around new developments of interest; and taking steps to ensure that letters of support for members' planning applications meet prescribed quality standards. We trust that these comments are useful in developing the next draft of your Local Plan.

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