



## **Planning matters of concern to farmers and growers**

### **1. New infrastructure for agricultural diversification/expansion resulting from CAP reform towards market-led industry**

Since the abolition of production-based subsidies in January 2005, the trend of CAP reform has been towards encouraging a market-led industry. Consequently we can expect planning applications for new infrastructure to support emerging and expanding enterprises as they move to meet demands from existing and new markets. Local planning policy must reflect this national driver of change.

### **2. Development to enable farms to comply with evolving environmental, hygiene and animal welfare standards**

Legislation and assurance scheme protocols impose increasingly stringent standards on farm businesses in the areas of environmental management, employee working conditions, site and product hygiene and others. In many cases this requires the replacement or modification of existing, outdated facilities if the business is to comply and survive. Once more, planning policy must recognise this external influence on agricultural business development.

### **3. Support for new/replacement buildings, especially where old ones are unsuitable for modern agricultural needs**

Where redundant farm buildings are unsuitable for non-agricultural diversification purposes and cannot be adapted for modern agricultural needs, demolition and replacement with up-to-date alternatives may be crucial to the development of successful farm businesses. We would like to see planning policy make provision for such new buildings.

#### **4. Protection of best and most versatile agricultural land in light of food security requirements**

Best and most versatile (BMV) agricultural land has always been protected in national planning guidance unless there is no suitable, sustainable alternative where development is needed for the wider public good. We take a pragmatic approach to this and accept that the loss of BMV land may sometimes be necessary.

#### **5. Continuation of support for non-agricultural diversification to supplement core agricultural activity**

The long-term prospects for agriculture are good, and the sector is one of the few to be unaffected so far by the world recession. Populations are increasing while climate change reduces the productive area worldwide. The UK is likely to remain productive for the foreseeable future and will remain a provider of food for its own and overseas needs. However, we are not yet out of the low profitability trend that has held back the industry over the past 12 years or so. The non-agricultural diversification that has been the saviour of many farm businesses remains important and should be retained in planning policy for the next plan period, in line with national planning guidance.

#### **6. Continuation of support for conversion of redundant farm buildings**

Redundant farm buildings are a valuable asset for conversion, whether for agricultural purposes in a developing business or for diversified, non-agricultural projects. There is also the possibility of conversion to rural affordable housing, as suggested in section 7.

#### **7. Affordable housing in rural areas to complement rural employment opportunities**

Developing and new farm businesses, together with non-agricultural rural businesses (often set up in diversified farm premises) will need a source of labour. We support planning policy that provides adequate stocks of affordable housing in areas where employment opportunities exist. Such a policy should include the conversion of redundant farm buildings into

affordable housing, perhaps even where conversion for open-market residential conversion would not be considered appropriate.

### **8. Seasonal worker accommodation**

Fruit, vegetable and salad crop producers are dependant on temporary harvest workers during the picking season. The preferred form of accommodation is mobile homes, often in large numbers on one site, with obvious planning implications. We would welcome a planning policy to deal with this so that well-balanced proposals with adequate support facilities and site screening could be permitted. The benefits of this accommodation option include:

- Operational flexibility of having workers on-site
- Number of units adjustable to reflect fluctuating labour requirement
- Reduced traffic volumes on local roads
- Reduced demand on local rented housing sector
- Improved employee welfare facility at central site

Alternatively, the conversion of existing buildings or erection of new ones, specifically designed for the purpose and either stand-alone or in combination with mobile homes, should be supported.

### **9. Sustainability policies**

While we acknowledge the preference for development in areas served by public transport, we believe that a pragmatic view must be taken about the continued reliance on private cars in rural areas. A balance must be struck to avoid refusing otherwise very worthy applications purely on the grounds that they fail to meet unrealistic sustainable transport aspirations. This point was made by the Matthew Taylor Review in respect of housing (the sustainability trap).

### **10. Development near existing farms**

We ask that due account be taken of existing farms before new residential development is permitted in their vicinity. Existing legislation gives the advantage to the complainant in statutory nuisance cases (mainly smell and noise), even where the farm existed long before the houses. The

existence of residential development is always taken into account when agricultural or other commercial development is proposed. Due account should be given in planning conditions to alleviate potential conflict where permission for new residential development is given.

### **11. On-farm water storage**

Agricultural abstraction is essential for irrigation, livestock, crop washing, food processing, crop protection and dairy hygiene purposes. In general, water abstraction has an increasingly damaging effect on rivers and groundwater as the demand for this scarce resource increases to meet all society's needs. The storage of winter abstractions and rainwater in reservoirs or tanks for use in the drier summer months provides a substantial, sustainable additional water resource and reduces damaging abstractions during summer low-flow conditions. Farm reservoirs are encouraged by the Environment Agency in Catchment Abstraction Management Plans and in River Basin Plans (Water Framework Directive delivery). Part-funding for them is available from SEEDA. We would welcome planning policy to reflect this high-level encouragement of on-farm water storage, which in effect provides a new, sustainable water resource.

### **12. Farm shops**

Farm shops have become a common means of supplying locally produced foods directly to the consumer, meeting a number of objectives of the Strategy for Sustainable Farming and Food and providing a diversification lifeline to some farm businesses. To be viable they usually need to sell a proportion of externally-sourced lines. It would be useful to have a planning policy setting out reasonable and proportionate conditions on what constitutes 'local', and what ratio of home-produced/externally-sourced lines is acceptable. The importance of farm shops as a diversification enterprise and service provider (eg Post Office) should be weighed against any policy to restrict 'out of town' retail development. The NFU would welcome the opportunity to contribute information to assist in formulating such policy.

### **13. Renewable energy generating projects**

We would welcome planning policy in support of renewable energy projects of any size. This would guarantee a market for energy crops and recycled biomass, opening up a new opportunity for farmers beyond the limited scope of what has happened so far. The policy must include anaerobic digestion (AD) as well as combined heat and power (CHP), 'heat only' projects, wind and solar power. AD has the potential to bring climate change mitigation benefits by reducing the release to atmosphere of ammonia (a principal greenhouse gas) as well as providing power from waste.

### **14. Environmental management benefits most cost-effectively delivered through profitable farming**

We would like environmental policies to reflect the fact that profitable farming is the most cost-effective means of delivering environmental and landscape management benefits as a by-product of their day-to-day business operations.

### **15. Non-statutory designations**

We do not support the use of non-statutory landscape designations to restrict reasonable development in the countryside. PPS7 states that criteria-based policies are preferable to 'rigid local designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas.' The South East Plan reiterates the PPS7 preference by encouraging local authorities to develop criteria-based landscape policies (Policy C4, Ch.11 – Countryside and Landscape Management).

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