# Consultation comments on policy E9 – economic development in the rural area

- Support 13
- Neither support of object 7
- **-** Object − 4

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

Comments that support policy E9 – economic development in the rural area		
Respondent number	Comment	Officer comment
ANON-KSAR- N856-2	As mentioned previously, the proposed development of 3G floodlit football pitches at Mill Lane, Wickham would contravene many of the conditions in these	There are no issues arising for Policy E9 from this comment.
	policies:- NO reduction of carbon emissions and the need to travel NO business plan (this would be needed as the facility could not be afforded only by the local team)	Comments regarding Wickham (Mill Lane) will be considered under responses to site allocation The Glebe (WK2) and other allocations in Wickham as relevant.
	High traffic generation Pollution of light and noise (next to S Downs National Park) high impact on the rural countryside Poor access from narrow country lanes Other sites have not been considered for suitability NO community support	Recommended response: No Change.

ANON-KSAR-	We support the principles of the policy. However	Support welcomed and comments noted.
NKFQ-1	experience tells us that it is difficult to regulate the	
Upham Parish	use of a commercial development once completed	Recommended Response: No Change
Council	and occupied.	

Respondent number	Comment	Officer comment
ANON- KSAR- NK3F-3	In South Wonston, there is no potential for economic development. There is one small firm, Venta, a shop/post office and a primary school. There is no	There are no issues arising for Policy E9 from this comment.
	space for further economic development so this issue is irrelevant for the village. 40 extra households would therefore not find employment in the village and would have to use their cars, because of the lack of public transport.	This comment is in relation to proposed site allocation at South Wonston (SW1) and will be considered under responses to SW1.  Recommended response: No Change.
ANON- KSAR- N8YF-P	I think there needs to be consideration that some "rural" areas are rapidly becoming as large as some of the small towns and hence more development/provision needs to be considered to support the growing community and make the need for travel less necessary	The strategy of the plan is to allow development to support community needs in the more sustainable settlements and reduce the need to travel,. Economic development is allowed for within the settlement boundaries. Policy E9 supports various forms of economic development in the countryside, where it is compatible with the rural character and local environment. Policy E8 supports the development of local facilities that would support local communities wherever they are located.

		Recommended Response: No Change
ANON- KSAR- N8GP-E Denmead Parish Council ANON- KSAR- N8GX-P	Does this policy preclude the building of new barns 'for farming needs' in the countryside so that existing barns can be rented out for non-farm uses, such as for industrial uses?	The building of new agricultural units and some changes of use of agricultural buildings and additional development are permitted development under planning legislation and therefore outside of planning control and local plan policies.  Where permission is required, the use of appropriate conditions can be considered in respect of future changes, where this is justified and reasonable in planning terms.
BHLF- KSAR- N8Z7-8 South Downs National Park Authority	In terms of Policies E1, E9, E10 and E11, we recommend that reference is made to the South Downs Sustainable Tourism Strategy.	Recommended Response: No Change See response under E1 and changes to E11. Recommended Response: No Change

Comments that object to policy E9 – economic development in the rural area		
Respondent	condent   Comment   Officer comment	
number		
ANON-	We would be minded to support more of this policy if	Strategic Policy SP3 of the plan sets out a presumption
KSAR-	there were better and clearer safeguards for greenfield	against unnecessary development within the
NKG5-6	land adjacent to rural industrial development.	countryside. Policy E9 allows for some industrial

Crawley Parish Council	We raise this as Crawley Parish Council has particular concerns about industrial creep to the north of Three Maids Hill (A272). How far can development be allowed into the countryside? The size of rural industrial developments need to be limited to remove the threat of over expansion that would degrade the rural nature of the area and biodiversity.	development in strictly limited circumstances as set out in the policy. The policy does not set any size criteria as proposals will need to be assessed on their merits and with regard to the particular local circumstances that apply – including the surroundings and local environment. The plan should be read as a whole and there are other policies of the plan that consider impacts on rural character and biodiversity within the Natural Environment and Biodiversity Topic of the plan.  Recommended Response: No Change
ANON- KSAR- NKHU-7 & BHLF- KSAR- N8T8-3 Oliver's Battery Parish Council	Economic Development in the Rural Area (Policy E9)  Add at the end of the last paragraph (Proposals that may be acceptable in principle will nonetheless be refused if they result in unacceptable impacts on the rural environment), ", including the potential loss of the best and most versatile agricultural land" (as food supplies are a matter of national security).	The same comment has been made by this respondent previously and a response provided under Policy E1.  No new issues are raised under E9.  Recommended Response: No Change.
ANON- KSAR- NKZ5-S	The description suggests achieving sustainable economic growth except there is nothing about sustainability in the Policy. Needs something to allow refusal of unstainable practises	Economic development can help support the economic and social viability of local communities, by providing potential sources of local employment and reducing the need to travel. Where economic development would have harmful impacts in terms of the local environment or large traffic generations that cannot be mitigated, the proposal is unlikely to be permitted.

Policy E9 allows for strictly limited forms and amounts of development in the rural areas in order to protect the countryside. A balance between economic growth and any harms is being sought by the policy.

The plan encourages and supports development that move towards a green economy as set out in the vision and objectives of the plan and the principles set out in Spatial Strategy SP2 and the Vibrant Economy strategy E1.

The local plan cannot control the practices of business to the extent suggested by the comment, however the council is working with local businesses to improve sustainable practices and supply chains, including sourcing local and organic food, via the implementation of the GEDS and other initiatives such as the evolving Sustainable Tourism and Cultural Strategies.

**Recommended Response:** Updating of text to refer to these strategies – 10.136

and the development of a Sustainable Tourism **and Cultural** Strategyies..

ANON- KSAR-	point i - this should be expanded to suitable sites which are designated for agricultural horticulture forestry etc	Dwellings for agricultural workers are covered under Policy H11 (Housing for Essential Rural Workers). This
N8N9-X	workers, but not necessarily within the agricultural site where they are employed.	comment will be considered as part of the responses on that policy.
	These workers are often lower paid and cannot afford the price of dwellings in the countryside locale of their	Recommended Response: No Change
	employment. There should be an opportunity to build	
	dwellings in the countryside designated for this type of worker, provided it meets criteria such as point viii, and	
	is not isolated in the countryside.	
ANON-	10.140 "A balanced approach will need to be taken,	Paragraph 10.140 is in relation to the local planning
KSAR-	using the principles set out in this policy against the	authority's approach to considering proposals. It is
NKZ5-S	objective of preventing unacceptable harm to the rural	accepted that the text could be re-worded and this will
Caniad fram	environment." does this mean they don't have to do	be considered as part of the updating of the text of the
Copied from E1	anything?	local plan prior to publication.
		Recommended Response: No change.
		There is a drafting error in the text at 10.142, where it
		had been agreed with the Cabinet Member that this
		sentence should be deleted prior to the publication of
		the Draft Plan in November 2022. It is proposed that
		this is corrected now.
		Minor changes to policy to correct references and
		numbering are proposed.
		Recommendation:
		Delete final sentence of 10.42 as follows –

	'Any such development should be appropriate to the proposed location in terms of scale and must not have an unacceptable impact on the character of the countryside or the form and setting of the settlement. The proposal must demonstrate clear community support.'
	Amend Policy E9 as follows –
	iii. The proposal is for the reuse of existing rural buildings for employment or <b>visitor</b> tourist accommodation; or
	And
	vi- i-There is a recognised and demonstrable need within the locality, for the development proposed;
	vii ii Sequentially preferable sites are not suitable or available; and
	viii ii-AndThe site is well related to a nearby settlement and in a sustainable location.

	Recommendations	Officer response
Comments from SA	NONE	
Comments from HRA	NONE	

# Amendments to policy E9

# Amendments to supporting text

All supporting text updated, final version below.

#### **ECONOMIC DEVELOPMENT IN THE RURAL AREA**

- The spatial strategy sets the context for development across the plan area, as part of which development within the countryside will be strictly controlled. Strategic Policy E2 sets out the economic aspects of the spatial strategy, including the rural area.
- 10.145 The rural character and the high quality of the local environment of the district's countryside is a much-valued asset. It is important that developments within the countryside do not harm the integrity of this asset. The rural economy is also a valued aspect of the district. The GEDS seeks to develop a lower carbon economy, with opportunities for small scale business development in sustainable locations, development of the green economy and supporting low carbon infrastructure and the development of a Sustainable Tourism and Cultural Strategies.
- 10.146 In recognition that the rural area is different to the urban parts of the district, there is justification for widening the scope of economic development allowed in a manner that respects the valued aspects of the rural character. This can be in the form of supporting the expansion of existing facilities which will widen rural employment opportunities. This will support the development and viability of local service centres and can enable local clusters of complimentary activities.
- 10.147 Local employment opportunities can help to support the Local Plan aim of reducing carbon emissions, by reducing the need to travel, provided they are if carefully located in relation to nearby facilities and services and local transport routes that will support active travel. Therefore, development should be assessed in accordance with these principles.
- 10.148 A balanced approach will need to be taken, using the principles set out in this policy against the objective of preventing unacceptable harm to the rural environment.

- 10.149 There are strict limits to development outside settlements. Accordingly, Policy E9 focuses on the re-use of existing buildings, with limited new development in the specific circumstances as set out in the policy.
- 10.150 Where proposals are put forward outside of settlements, they must be supported by a statement and robust business plan setting out the operational/functional need for the scale of development proposed and the justification for its location including, an assessment of other potential sites and buildings that have been considered. Any such development should be appropriate to the proposed location in terms of scale and must not have an unacceptable impact on the character of the countryside or the form and setting of the settlement.
- 10.151 The contribution that proposals could make to enhancing the vitality and viability of nearby settlements will be taken into consideration. In order to promote sustainable development and minimise car travel, proposals should be located so as to allow for access by active travel where possible. The contribution that proposals that will make to the development of the 20 minute neighbourhood will be taken into consideration when assessing the benefits of proposals.
- 10.152 Proposals that will contribute to the development of hubs that service the local area will be favourably considered. There are benefits to developments co-locating, subject to the resulting scale of environmental impacts. Rural enterprise hubs where a number of small businesses are located in a cluster with shared broadband connection and other essential facilities are of value, making use of existing employment sites or rural buildings, such as farm complexes.
- 10.153 In order to minimise additional impacts on the local environment, all proposals should explore the possibilities of using existing buildings in the first instance. There are often redundant farm buildings which can be utilised, rather than adding new built development to the landscape. It may be necessary to extend them to use for economic development. Where new or replacement buildings are required, where possible they should be in close proximity to an existing group of buildings and the siting, form, scale, design and external materials of the new buildings should not detract from the existing buildings nor the character of the surrounding area.
- 10.154 It is recognised that existing buildings may not always be visually attractive or appropriately sited and it may occasionally be of overall benefit to the environment to construct new buildings or redevelop the site.

- 10.155 Strategic Policy E1 supports the development of more localised working and working from home. Extensions of residential properties to enable business activities and proposals for small scale economic development within the curtilage of existing residential properties will be supported, subject to careful consideration of visual intrusion, the physical scale of development proposed and the nature of any proposed business. Developments that adversely impact on the amenity of the area will not be supported.
- The city council wishes to encourage new forms of development to develop a new greener low carbon economy. This is line with the Carbon Neutrality Action Plan and the GEDS. Locations will be required for decentralised energy generation and storage. It is acknowledged that some of these developments may have impacts on the environment, so location in association with existing development such as farms may be helpful.
- 10.157 In relation to new development related to the green economy, special consideration will be given to the contribution of the proposal to the national energy strategy, reduction of carbon emissions or other mitigation of the effects of climate change, when considering the merits of the proposal. The weight of any benefits will be weighed against any harmful effects on the character of the rural area.
- 10.158 All proposals for economic development within the countryside will be assessed in the context of their impact on the rural character. The visual impact of proposals, the suitability of the site and access to it and the amount and type of traffic generated by the proposal will be taken into consideration. Issues of noise, light and other pollution will be important in view of the countryside location.
- 10.159 Economic development within the countryside should comply with the plan as a whole, with particular attention to policies that maintain and enhance the character of the rural area and the natural environment (Policies NE1-NE17 and also those relating to sustainable transport (Policies T1-T4) and pollution (Policy D9).
- 10.160 In order to protect the character of the rural environment and prevent the future development of unacceptable uses or forms of development, conditions may be imposed restricting the range of uses, and permitted development rights in relation to changes of use and physical extensions may be imposed where they are justified and reasonable.

# Policy E9 Economic Development in the Rural Area

Outside of the defined settlement boundaries, the primary consideration is that new development must not have an adverse effect on the rural character of the area and be compatible with the need to preserve and maintain the quality of the natural environment.

Economic development outside of settlements will be supported when:

- i. The development has an operational need for a countryside location, such as for agriculture, horticulture or forestry; or
- ii. The proposal is for the purposes of business use in association with residential accommodation within the same curtilage; or
- iii. The proposal is for the reuse of existing rural buildings for employment or visitor accommodation; or
- iv. The development will be solely within the confines of established purpose built industrial estates; or
- v. The proposal is for the use of existing buildings including extensions to such buildings in order to facilitate the expansion onsite of established businesses or to meet an operational need.

Proposals for additional buildings in association with existing businesses will be considered where it can be demonstrated that there is a need for the development and that this need cannot be provided within the existing buildings on the site or extensions to such buildings.

The redevelopment of existing sites/ buildings on established business sites may exceptionally be considered where proposals relate to established businesses on the site and it can be demonstrated that existing buildings will not meet the requirements of the business.

Proposals for new industrial and commercial development outside the settlement boundaries that do not fall within the above criteria will not usually be permitted. However, proposals may exceptionally be considered where the following criteria can be satisfied:

i. There is a recognised and demonstrable need within the locality, for the development proposed;

- ii. Sequentially preferable sites are not suitable or available; And
- iii. The site is well related to a nearby settlement and in a sustainable location.

Where planning permission is required, extensions of residential properties to enable business activities and proposals for small scale economic development within the curtilage of existing residential properties in the countryside, will be supported, subject to careful consideration of visual intrusion, the physical scale of development proposed and the nature of any proposed business.

All proposals for economic development within the countryside will be assessed in the context of their impact on the rural character and the suitability of the location and the nature of the development proposed, including access to the site.

Where planning permission is required, permissions may be restricted to particular use classes or sub-divisions thereof and/or restrictions may be placed on permitted development rights where appropriate and reasonable.

Proposals that may be acceptable in principle will nonetheless be refused if they result in unacceptable impacts on the rural environment.