

Consultation comments on policy E10 – farm diversification

- Support - 9
- Neither support of object - 7
- Object - 5

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 which support policy E10 – farm diversification		
Respondent number	Comment	Officer comment
ANON-KSAR-NKBD-G	Please encourage farmers to use regenerative practices and to protect trees, hedges and traditional orchards.	<p>Support welcomed and comments noted. The council would support proposals that use regenerative practices and make improvements to biodiversity and ecosystem services as part of farm plans and amendments are proposed to the text to make this more explicit. However, many of the activities referred to in the comment relate to matters that are not usually under the control of the planning system, except in the cases of tree and hedgerow preservation orders and ancient trees, which policy NE15 of the local plan considers.</p> <p>The protection and enhancement of trees and hedges can be conditioned in relation to planning applications and ongoing management plans.</p> <p>Recommended Response: Amend text at 10.162 as follows –</p>

		<p>Changes to the economy may mean that large parts of farms, or some farms in their entirety may cease to be in agricultural production. Changes of land from crop production to use such as set-aside The setting-aside of land for biodiversity benefits, such as habitat creation, soil regeneration and nitrate or phosphate mitigation, or for carbon sequestration or flood risk mitigation, will generally be supported encouraged as part of farm plans although in isolation such initiatives are likely to fall outside of the planning regime. and These may assist in the viability of land holdings as well as providing benefits in relation to biodiversity and the mitigation of climate change.</p>
--	--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Comments which neither support or object to policy E10 – farm diversification		
Respondent number	Comment	Officer comment
ANON-KSAR-NKGG-R	Farm diversification should be supported but not to the detriment of the environment both physically and visually. The development of renewable energy farms - eg solar farms need to be carefully considered - they need to be part of the landscape, not dominate it.	<p>It is important that LP is read as a whole. Policy CN5 (Renewable and Low Carbon Energy Schemes) provides criteria to assess proposals for renewable energy such as solar farms and this includes impacts on the landscape.</p> <p>Recommended response: No change</p>
ANON-KSAR-NKQ5-G	I wanted to READ this item, not give a view on it.	Noted.
ANON-KSAR-NK29-N	Para 10.158 – Modify to ‘More radical changes that involve, for example new buildings or agrivoltaics, may be considered in the interests of supporting the ongoing viability of agricultural enterprises, where evidenced.’	It is accepted that this paragraph should be revised and that the policy and text should be clearer about when new buildings will be acceptable and amendments are recommended.

		<p>The policy already allows for renewable energy schemes in principle, however this could be made more explicit within the policy and text and refer explicitly to agrivoltaics.</p> <p>Policy E10 - Add to end of first paragraph - Proposals will be expected to justify why existing buildings cannot be used and additional buildings limited to where they are essential.</p> <p>Add additional sentences to text at end of paragraph 10.154 – Examples would include renewable energy schemes, which will be supported where they do not have unacceptable impacts on the local environment. Agrivoltaic projects allow for farming to continue in association with solar energy production.</p> <p>Move the following sentence from E10 to the supporting text and add reference to solar farms as follows - Proposals for renewable and low carbon energy schemes, including solar farms, will be assessed against Policy CN5.</p>
ANON-KSAR-N8GP-E Denmead Parish Council	Does this ensure that new farm buildings are not built simply so that existing buildings can be used for non-farm related activity e.g. renting out barns to motorway maintenance contractors	<p>Duplicate comments submitted under E9. See response provided under E9.</p> <p>Recommended Response: No Change</p>

ANON-KSAR-N8GX-P		
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.	See response under E1 and changes to E11. Recommended Response: No Change
BHLF-KSAR-N86T-1 Hampshire County Council (Transport)	P318 – Policy E10 – Farm Diversification Whilst Hampshire County Council recognises that farm diversification is supported by national planning policy it is expected to result in an increase in vehicle trips on rural road network including HGVs and larger vehicles. As such it needs to be carefully assessed and properly mitigated and the County Council would welcome reference to this issue as well as consideration of innovative proposals to mitigate these issues such as rural mobility hubs and micro-consolidation sites.	The comments are noted. It is important that LP is read as a whole. Policies T1-T4 in the sustainable transport and active travel topic consider the issues of traffic generation and innovative travel solutions. It is not considered necessary for Policy E10 to repeat this, although the supporting text at 10.161 does refer to both levels of traffic and accessibility by sustainable transport. Recommended Response: No Change

Comment which object to policy E10 – farm diversification		
Respondent number	Comment	Officer comment
ANON-KSAR-NKN8-G	Given Brexit and current world problems, we should be encouraging farms to produce more local produce, not divert their land to other uses	Government guidance advises against loss of the best and most versatile agricultural land (BMV) and this is one of the factors taken into consideration in assessing development proposals. The Local Plan cannot control all development on agricultural land.

		<p>However, it is considered that the text could be amended to illustrate the range of considerations that will be considered as part of the assessment of proposals, including food production.</p> <p>Recommended Response: Delete existing text at 10.156 and replace as follows –</p> <p>10.156</p> <p>The diversification of existing holdings into non-food production, which may nonetheless be appropriate in a rural area.</p> <p>Within the bounds of planning legislation, farm diversification proposals will therefore be considered with regard to a number of factors, including the continuing viability of the farming enterprise, impacts on the local environment, improvements in local food production and supply chains, the need to preserve productive land and any wider benefits in terms of carbon reduction and climate change mitigation.</p>
<p>ANON-KSAR-NKZ5-S</p> <p>ANON-KSAR-N819-1</p>	<p>This policy does not go far enough to signpost the opportunities to promote a more diverse rural economy and improve the sustainability of farming for the benefits of all.</p> <p>Amend 10.159 to read as follows showing inclusion of 'protection and enhancement of biodiversity': ...to promote a more diverse rural economy and to move towards a more low carbon green economy, with protection and enhancement of biodiversity.</p>	<p>The comments seek greater acknowledgement of the potential benefits to biodiversity and in relation to setting aside of land for various purposes, such as habit recreation and carbon sequestration.</p> <p>This was already covered in the existing text at 10.162. However amendments are being proposed to the text to cover this more completely and are outlined in the response to comments provided above.</p>

	<p>Amend 10.158 or add following as new paras or sub paras:</p> <p>Radical changes can include new developments or changes in land use for a green economy and mitigating the climate and biodiversity crisis. Multi-benefit approaches with application of Agrivoltaic projects using Renewable Energy from solar and farming is an example. In other words, locating solar generating modules on the same surface as agricultural production. See new standards defined in France for agrivoltaics – pv magazine International (pv-magazine.com) indicate best definitions for Agrivoltaics.</p> <p>Agrivoltaics allow land practises - crops and livestock production to use land and light twice for new green businesses and economy benefits whilst protecting the environment and improving food yields. Specifically, this approach will need justification against the “strong presumption” against solar farms on the best and most versatile (BMV) land – land that is classified in law as Grade 1, Grade 2, or Grade 3a. This will overcome current focus only Grade 3b land confirmed suitable for solar farm development - Farmers Weekly (fwi.co.uk). Importantly, Agrivoltaics solar farms do not displace farming they can enhance the land use, productivity, decarbonisation, and biodiversity with new green business opportunities.</p> <p>General comments below need to be inculcated into E10. (See CNP Roadmap report from WSP).</p>	<p>Additions are recommended to the text and policy in relation to agrivoltaics and solar farms as outlined in the response to comments above.</p> <p>Recommended Response: No additional changes (see above)</p>
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	<p>An agriculture and the land management strategy should be considered alongside one another. For example, open habitats (such as heathlands and semi-natural grasslands), additional conservation headlands and arable field margins, and strip farming should be integrated into agricultural landscapes, or enhanced where already present.</p> <p>These habitats can sequester greater amounts of carbon than agriculture alone (which is considered a net-emitter of carbon dioxide), reduce nutrient depletion and enhance soil health, which will indirectly sequester additional carbon.</p>	
ANON-KSAR-NKXV-R	<p>As important as energy security for our country is the issue of food security. This policy encourages farms to move away from food production.</p> <p>Local food production also can have a massive impact on reducing our District's 'food miles' - a significant part of our carbon cost to the planet.</p> <p>Encouraging local food production could bring a real carbon benefit to the district in reducing the amount of food 'imported' from other areas. It would also bring an economic benefit.</p> <p>We are increasingly seeing good quality land within the district NOT being used for farming / food production but being left fallow until a development opportunity comes along. We should be encouraging our landowners and farmers to actually FARM. We are lucky to have a lot of good and moderate (still good for</p>	<p>The aim of this policy is to support the longer-term viability and financial survival of farms sustainably. This is best done by supporting some degree of diversification which will assist in the long-term survival of the enterprise. The policy supports proposals that will utilise local food and produce such as farm shops and food processing activities. An amendment to the text 1.156 is proposed as part of recommendations to comments above that illustrate the range of considerations that will be considered as part of the assessment of proposals, including food production.</p> <p>Recommended Response: No additional changes (see above)</p>

	food production and arguably more productive in drier years because of moisture retention). This policy seems to reward farmers who choose not to farm.	
ANON-KSAR-N88Q-Z	<p>E10 New paragraph 4</p> <p>Include protect, enhance and make available grade 1 and 2 peri-urban land for community growing and commercial sustainable agriculture.</p> <p>Protect and re-establish vital sustainable food infrastructure to support shorter based supply chains.</p>	<p>Policy CN1 of the plan requires development proposals to consider the potential for local food production as part of the design process.</p> <p>Outside of the local plan, other council initiatives are working on improving local food production and sustainable food chains, such as via the actions arising from the GEDS.</p> <p>Recommended Response: No change</p>

	Recommendations	Officer response
Comments from SA	<p>The recommendations for the policy text are included to help mitigate any negative effects and strengthen any positive effects identified:</p> <p>Policy E10 presently supports development at farms which will encourage a low carbon economy. The policy could be strengthened by providing a similar level of support for biodiversity projects and flood risk mitigation.</p> <p>The supporting text for Policy E10 presently states that some forms of development for farm diversification may be of such a scale that they should be located in industrial locations as they are akin to factories and have unacceptable levels of traffic from deliveries and employees. The</p>	<p>An addition to the policy to cover biodiversity and flood risk has been recommended above.</p> <p>In relation to traffic increases, it is important that the local plan is read as a whole. Policies T1-T4 in the sustainable transport and active travel topic consider this issue. The supporting text at 10.161 does refer to unacceptable levels of traffic, but it is not considered necessary for this to be within the policy itself.</p> <p>The policy already states a preference for the re-use of existing buildings, however amendments are proposed to the policy and text in relation to comments above that strengthen this.</p> <p>Recommended response: No Change.</p>

	<p>policy text could be further strengthened by requiring proposals for farm diversification to demonstrate that there would be no unacceptable increase in traffic to the site in question (from employees, site visitors and deliveries) as a result of development.</p> <p>Policy E10 could be further strengthened by requiring proposals to demonstrate that existing buildings onsite have been considered for re-use before proposing the development of new structures</p>	
Comments from HRA	NONE AS YET	

Amendments to policy E10

Amendments to supporting text

All supporting text updated, final version below.

FARM DIVERSIFICATION

10.161 Agriculture and land related activities are appropriate uses in rural locations. The need to address climate change issues including flooding, loss of biodiversity, and the development of new food sources and products is creating new challenges in the rural areas. Wider economic and societal changes may also result in new activities in traditional agricultural areas.

10.162 There are also opportunities to take advantage of these wider changes in a positive way, to promote a more diverse rural economy and to move towards a more low carbon green economy. This may involve new forms and scales of development in rural locations. Examples would include renewable energy schemes, which will be supported where they do not have unacceptable impacts on the local environment. Agrivoltaic projects allow for farming to continue in association with solar energy production.

10.163 The city council seeks to support the viability of existing enterprises with policies that are sufficiently flexible to meet the anticipated challenges in agriculture and the rural economy and provide wider benefits in terms of sustainability and carbon reduction.

10.164 Within the bounds of planning legislation, farm diversification proposals will therefore be considered with regard to a number of factors, including the continuing viability of the farming enterprise, impacts on the local environment (including impacts from increased levels of activity and traffic generation) improvements in local food production and supply chains, the need to preserve productive land and any wider benefits in terms of carbon reduction and climate change mitigation.

10.165 In order to maintain the character of the countryside, new built development is generally kept to a minimum. Where permission is required for development on agricultural land, proposals should therefore use existing buildings where possible and provide justification where this is not the case. Diversification may require additional built development, or re-development. The case for this should be evidenced by viability assessments and farm plans.

10.166 Typically farm diversification provides for tourism and leisure activities, and in some cases the sale of farm produce. Other activities include small-scale industrial and commercial uses.

10.167 Proposals that attract visitors to the farm (e.g. retailing, cafés, visitor activities, education and leisure activities) are considered in Policy E11 (Visitor-related Development in the Countryside) The Natural Environment section of the local plan contains a number of policies that are relevant in relation to leisure and recreation activities in the countryside, such as NE12 (Equestrian Development).

10.168 Proposals for renewable and low carbon energy schemes, including solar farms, will be assessed against Policy CN5.

10.169 Proposals for industrial and commercial development, such as offices, workshops and storage and distribution will be assessed with regard to Policy E9 (Economic Development in the Rural Area).

10.170 The setting-aside of land for biodiversity benefits, such as habitat creation, soil regeneration and nitrate or phosphate mitigation, or for carbon sequestration or flood risk mitigation, will generally be supported as part of farm plans although in isolation such initiatives are likely to fall outside of the planning regime. These may assist in the viability of land holdings as well as providing benefits in relation to biodiversity and the mitigation of climate change.

10.171 Promotion of sustainable forms of agriculture which include environmentally sensitive organic and locally distinctive food production together with its processing, marketing and retailing will be encouraged as part of a thriving and diverse rural economy.

10.172 Development related to produce from the farm and the local area may be supported along with development that brings benefits to the local community and economy beyond the farm itself. Small scale produce or farming-related activities, e.g. micro-breweries, vineyards, bakeries etc may be acceptable dependant on exact nature of the activity.

10.173 However, some forms of development such as large-scale food processing may be of such a scale that they should be located in industrial locations. This is due to their visual impacts, possible noise, light, additional transport movements and other pollution. These uses are more akin to factories and may also have unacceptable levels of traffic from deliveries and employees. They should be sited where they are accessible by sustainable transport.

Policy E10 Farm Diversification

Farm diversification will generally be supported, and should utilise existing buildings in the first instance, where practical and feasible. Proposals will be expected to justify why existing buildings cannot be used. Additional buildings will only be permitted where it is demonstrated they are essential.

Common forms of farm diversification include visitor accommodation and farm shops. Farm shops should primarily sell products from the farm and nearby area.

Diversification proposals that support the development of a low carbon economy are generally welcomed subject to unacceptable impacts on the local environment. These can take a variety of forms involving new uses for land or new constructions and can assist in supporting the viability of the farm. Diversification that provides biodiversity benefits or contributes to climate change or pollution mitigation will be encouraged and supported.

Additional new development on agricultural holdings that will enhance the viability of the existing farm may also be acceptable, including the development of buildings and associated uses that use produce from the farm or farms from within the local area, such as food processing operations, subject to careful consideration of their scale and impacts.

Proposals for diversification on agricultural holdings should provide evidence to indicate how the development will assist in the continued viability of the enterprise.

Complete redevelopment of agricultural holdings may exceptionally be justified on grounds of viability and should be for other economic uses and in a form that is acceptable in the rural environment.