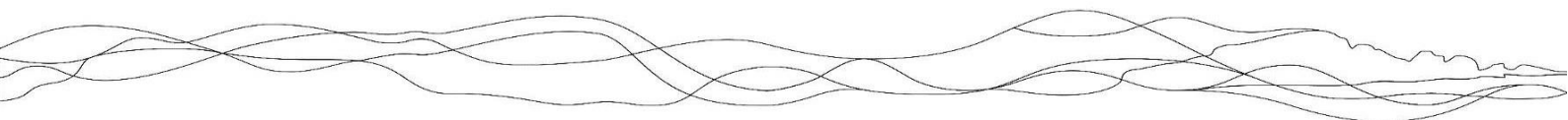


Agriculture and Forestry Background Paper

South Downs Local Plan

September 2017

Revised April 2018



I. INTRODUCTION

Policies covered:

- **Policy SD39:** Agriculture and Forestry
- **Policy SD40:** Farm and Forestry Diversification
- **Policy SD41:** Conversion of Redundant Agricultural or Forestry Buildings

1.1 This paper outlines the basis upon which Policies SD39, SD40 and SD41 of the Local Plan have been formulated. It explains the context behind why the policies are necessary to ensure that the Purposes and Duty of the National Park are met, briefly summarises national policy, and summarises the key evidence base which has fed into the policies.

2. NATIONAL PARK PURPOSES & DUTY AND SPECIAL QUALITIES

2.1 Agriculture and forestry/woodland management (henceforward referred to as 'forestry') are the two largest land uses in the National Park. The way they are carried out is therefore fundamental to delivering the first purpose of the National Park- the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the area. The beauty of the landscape, the wildlife it contains and the cultural heritage of the area have all been formed in large part by centuries of agriculture and forestry work. Examples are the ditch-crossed brooklands and water-meadows of the river valleys, the precious habitats of ancient coppice woodland, and the many historic farmsteads sheltering listed barns and cowsheds. Their conservation and enhancement depends on their continued sympathetic treatment by today's farming and forestry businesses.

2.2 The second purpose of the National Park- promoting opportunities for the understanding and enjoyment of the Special Qualities- is also linked to agriculture and forestry, in particular by the work that farmers and forest managers do in maintaining public rights of way and permitted paths, and by the opportunity that tourist accommodation and recreation presents as an additional income stream to support farm and forestry businesses.

2.3 Supporting farming and forestry businesses also helps the National Park to meet its socio-economic duty. While farming and forestry themselves may only employ a small proportion of the National Park's total population, these jobs are of greater significance in remoter areas of the National Park. This is because have numerous links to the wider economy of the area, both in terms of supply chains, through farm diversification and the re-use of former farm buildings.

2.4 For the reasons above- and others, such as farming's importance to the area's adaptation to climate change- one of the Special Qualities of the National Park has therefore been designated: 'An environment shaped by centuries of farming and embracing new enterprise'. The National Park's agricultural character is thereby recognised in its own right as one of the most important qualities that needs protecting. This has been the main guiding principle behind the drafting of these policies; whilst also bearing in mind that, for reasons given above, agriculture and forestry practices make significant contributions to all the other Special Qualities.

3. NATIONAL POLICY AND GUIDANCE

- 3.1 The NPPF states in paragraph 28 that local plans should promote the development and diversification of agricultural and other land based rural businesses.
- 3.2 The National Parks Vision and Circular 2010 states that additional and concerted efforts are required to ensure that communities, planners and businesses have clear, consistent advice regarding the acceptable forms development that might take. This will help ensure that National Park communities are places where people can live and work by maintaining sustainable livelihoods; and also that authorities should continue to promote agri-environment schemes and other measures that enable farmers and land managers to deliver a wide range of ecosystem services and sustainable, secure and healthy food supplies.

4. LOCAL CONTEXT AND EVIDENCE

- 4.1 The agricultural and forestry policies have been prepared with significant input from officers and Members across the National Park who work with farmers and forestry businesses on a day-to-day basis to deliver the National Park purposes and duty. Farmers and forestry businesses themselves have fed into the policies particularly through the South Downs Land Managers Association (SDLMA). The drafting of the policies also drew on those policies on this topic already prepared for Joint Core Strategies and took into account consultation responses
- 4.2 The landscape evidence base of the NPA makes clear the fundamental role that farming and forestry have had in forming the nationally important landscape of the South Downs. However, the South Downs Integrated Landscape Character Assessment identified changing patterns of agriculture, and development (especially the conversion of farm buildings leading to the loss of character of their fabric and setting, and the bringing of new uses and traffic into the landscape), as two of the main forces for change with the potential for a negative impact on the landscape of the National Park.

5. ROUTE MAP FOR POLICY FORMULATION

Overall approach to policy drafting

- 5.1 The initial drafting of all these policies, prior to the Preferred Options consultation, drew on SDNPA officer knowledge of farming and forestry issues and businesses, and in particular past issues that had arisen with regard to planning applications for the type of development in question, and experience applying other such policies elsewhere. Past planning applications were reviewed for relevant points, and the case officers were spoken to. A review was carried out of the farming and forestry policies currently in place in Local Plans across the National Park (in particular Joint Core Strategies adopted since the establishment of the SDNP), and those in place in other protected landscapes. Telephone conversations were held with officers at those authorities to discuss the effectiveness of the policies. The policies were then drafted and taken to National Park Members for discussion and further review. Prior to Preferred Options consultation the policies were shown and discussed at a meeting held with the National Farmers Union. The Preferred Options consultation itself generated a large number of responses. While

collating these responses officers attended a meeting of the South Downs Land Managers Association and several “Farmers’ Breakfasts” organised by the NPA in locations around the National Park. The policies were re-drafted taking into account the consultation results, again with the input of officers from across the NPA. The revised draft policies were taken to and discussed at another SDLMG meeting and member workshop, followed by Planning Committee, with further changes made to the policies at each stage.

Policy SD39: Agriculture and Forestry

- 5.2** The initial drafting of this policy drew on SDNPA officer knowledge of past issues that had arisen with regard to agricultural planning applications, and experience applying other such policies elsewhere. Such issues included ensuring that buildings were justified by a real, and really local, need; avoiding the phenomenon of ‘agricultural’ buildings constructed with the intention of converting them to other uses as soon as possible; the specific layout issues associated with farmsteads; landscaping; and issues associated with the construction of new farm tracks. All these topics were reflected in Preferred Options Policy SD46: Agriculture and Forestry, consulted on in 2015.
- 5.3** This policy received one of the highest levels of responses at Preferred Options stage, with the SDLMA, National Farmers Union and Country Land and Business Association all sending responses (as well as many of their individual members). At the same time, several responses were received from other pressure groups and from parish councils. The responses to the policy were diverse, but many respondents focussed on an element in the supporting text (carried forward from a saved policy of the East Hampshire Local Plan: Second Review), requiring the demolition of new agricultural buildings if they stand empty for three years. This criterion has since been substantially revised so it only applies to buildings granted planning permission in exceptional circumstances.
- 5.4** Following the Preferred Options consultation, planning policy officers attended two meetings of the SDLMA where these policies were discussed; attended Farmers’ Breakfasts held by the NPA; and had further discussions with colleagues throughout the National Park Authority about how best to address the issues raised during the consultation. The changes made to the policy as a result of the Preferred Options consultation were set out in the Interim Consultation Statement.
- 5.5** Following the Pre Submission consultation, minor changes were made to the policy to address representations made, including removing the specific requirement for all developments to demonstrate assessment of alternative sites, and removing the restriction on development where suitable buildings have recently been disposed of (although a criterion which would achieve similar aims is retained in policy SD41). NPA Members and the South Downs Land Managers Group were consulted about these changes.

Policy SD40: Farm and Forestry Diversification

- 5.6** The initial drafting of this policy drew on the East Hampshire Joint Core Strategy, officer knowledge of the topic, and ongoing projects underway at the SDNPA on wood-related businesses, dairy food processing, and “whole estate plans”. Preferred Options policy SD47: Farm Diversification focussed on the type of building that should be used, and on building links between farm diversification and the concept of the “whole estate plan”.

- 5.7** This policy received many comments at Preferred Options consultation, in particular seeking clarification on the requirement for diversified activities to remain ancillary to the farming operation. Changes to the policy as a result of the consultation were subsequently discussed alongside those to the 'Agriculture and Forestry' policy, as described above. With input from NPA members, the emphasis was moved from "whole estate plans" to a less onerous requirement for a 'diversification plan', and detail was set out as to how this would demonstrate the continuing relationship of the new business to the farm. The changes made to the policy as a result of the consultation are set out in the Interim Consultation Statement.
- 5.8** Following the Pre Submission consultation, minor changes were made to the policy to address representations made, including removing some detailed requirements relating to income from diversified activities. NPA Members and the South Downs Land Managers Group were consulted about these changes.

Policy SD41: Conversion of Redundant Agricultural Buildings

- 5.9** The initial drafting of this policy drew on SDNPA officer knowledge of past issues that had arisen with regard to farm building conversion planning applications, and experience applying other such policies elsewhere. In particular the historic buildings officer had a major input into the policy and supporting text. The Preferred Options consultation elicited a mixture of responses, including confusion as to the extent to which the policy applied to non-heritage asset farm buildings. The policy has been amended, following the same route of internal and external discussions outlined for SD39. The amendments focus on clarification that the policy applies not only to buildings which are heritage assets, but also to more modern agricultural buildings, and that the agricultural character of such buildings is also important to the Special Qualities of the National Park.
- 5.10** Following the Pre Submission consultation, minor changes were made to the policy to address representations made, including expanding the potential uses of buildings which are not heritage assets to include residential conversions, including market housing where appropriate and where it can be demonstrated that other uses are not viable or demonstrably unachievable. NPA Members and the South Downs Land Managers Group were consulted about these changes.

6. CONCLUSIONS

- 6.1** The evidence base for the agricultural policies is heavily based on the experience of officers in various sections of the National Park Authority, on responses to public consultations and on dialogue with representatives of land managers. The policies are intended to ensure the continued and improved viability of the agricultural and forestry businesses that play such an important role in conserving and enhancing the National Park's landscape, and to protect the National Park's agricultural character.