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Date: June 2014

Dear Sir,

## **WARWICK DISTRICT LOCAL PLAN 2011-2029 CONSULTATION JUNE 2014**

Thank you for giving the NFU West Midlands Region the opportunity to comment on the Local Plan Consultation. The NFU is a professional body which represents the interests of 75% of all farmers and growers. Our views are on behalf of the farming and land management sector in general and follow discussion with local members.

It would be appropriate by way of an introduction to offer a few general remarks on farming and the planning system. Clearly food security is a key concern. On a global level it is of absolute importance that the world is able to feed itself; but it is equally important that food is produced in Warwickshire in order to meet our own needs.

The challenge in the 21st century is to increase productivity, maximise output, minimise inputs, achieve environmental sustainability and adapt to a changing climate - all of these challenges are ones which British agriculture is very well placed to meet. It is therefore vital that the planning system helps to ensure that farms can evolve and utilise best environmental practice in order to improve efficiencies and reduce carbon emissions.

The proposals outlined in the document will lead to large new developments in the district. This will place considerable additional demands on the natural resources of the area. Farmers have a particular interest in this issue as development will impact upon the surrounding agricultural land. Our detailed comments on the consultation paper are set out below.

### **Livestock units and residential development**

We have not made a detailed examination of all the locations outlined as site allocations for employment or housing development. However, where sites are allocated for development, the proximity of the land to existing livestock units must be examined. Sites should not be allocated for residential development if they are found to be in near proximity to an existing livestock unit. Farms can be sources of noise and odour and therefore neighbouring land could be unsuited to residential development. We are keen to ensure that development in the countryside does not result in conflict between new residents and existing farm businesses.

### **3 Prosperous Communities**

#### **Rural Economy**

Sections 3.18 to 3.23 demonstrate the Councils commitment to promoting the growth of the rural economy. However we do wish to point out that rural businesses are totally reliant on car and HGV transport, there is no alternative. Policy EC1 requires applicant to demonstrate that a proposal “would not generate significant traffic movements which would compromise the delivery of wider sustainable transport objectives, including safety, in accordance with TR2”. We would be concerned if a proposal for a rural business were rejected because of the perception that the business is unsustainable because potential clients would access the service via car transport. Therefore, would it be possible to amend this section to recognise the lack of alternative transport options available to rural businesses. Tourism businesses also rely on access by private car and therefore new tourism enterprises must not be limited to sites that are accessible by public transport routes.

#### **DS19 Green belt**

The Green Belt policy does not refer to the agricultural and rural businesses that are located within these areas. We have received calls from NFU members who are concerned about the difficulties they encounter when proposing development or changes in the Green Belt. We urge you to make your Green belt flexible and to allow these businesses to develop and evolve; this will help to safeguard their long term viability. We would like to see a can do attitude to development that recognises that farming businesses have an essential role in maintaining the local landscape by grazing livestock, maintaining hedgerows and participating in agri-environment schemes.

Therefore this policy should make a more specific reference to the need for agricultural businesses to develop. Agricultural business located within greenbelt have to respond to the same pressures to comply with higher welfare and environmental management standards in the same way as those businesses located in other areas of the county. They may also need to diversify their businesses, perhaps by supplying local produce through farm shops or by developing a tourism offer. Other Authorities have recognised the need for new small-scale economic development in the rural economy and for farm diversification schemes. Even if the support for businesses in these areas is implied by your current policy wording, it ought to be more stridently expressed within the plan.

#### **H12 Housing for Rural Workers**

We do not think it is reasonable to include the size restriction outlined in section 4.83. The policy needs to provide for a range of accommodation types to meet established local need, which should include dwellings to house people employed in agriculture.

The 140sq.m includes garaging which in reality makes the residential floor space even smaller. This size limit is at odds with the new permitted development rights, whereby farmers can convert redundant agricultural buildings to up to three C3 residential units with a total floor space of 450m<sup>2</sup>. Therefore we think that it is out of step to attempt to restrict rural workers dwellings to 140sq.m

When new dwellings are constructed for farm businesses it is important that they are large enough to cope with the many demands of the farm business, together with the needs of a farming family. A farmhouse will almost certainly require adequate space for

a farm office. It will also require an entrance porch and utility area where soiled outdoor clothing and shoes can be stored and washed in a space separate to the main living accommodation. This is important for maintaining adequate biosecurity measures. These needs are often not met by an ‘off the shelf’ design for an affordable home.

It is also important to recognise that an agricultural dwelling must be flexible enough to accommodate families at a range of life stages. Farming families do not have the option of moving house if they should outgrow their home and this must be recognised when planning new accommodation.

### **HS3 Local Green Space**

We are concerned by policy HS3 on Local Green Space. As it currently worded there appears to be a risk that agricultural land could be designated as Local Green Space. The document does not provide an adequate explanation of the consequences of designation and therefore we would like to see further explanation or justification for this policy.

The countryside is a living and working environment and agricultural land underpins the rural economy as it is used to produce food. We are concerned about the impacts of this policy farm businesses, particularly those that operate in the urban fringe or for those who already have issues with trespass. Therefore the policy should be revised to provide protection for agricultural land and farm businesses.

### **Flooding and Water**

*With the exception of FW1 (f)* we are broadly supportive of the Councils approach to flooding and water. The paper highlights the importance of resilience and this is a key issue for farmers and growers in the district. Large new developments in urban areas do have the potential to cause downstream impacts, even when new SUDs techniques are employed. It is important to recognise that farmers have to deal with these impacts as they are responsible for maintaining many of the area’s watercourses and drainage infrastructure. Waterlogging and flooding has the potential to directly impact upon the productivity of agricultural land so it is important to value and maintain our existing drainage infrastructure.

### **FW1**

We are very concerned about Point f “the site is not required for washland creation as part of overall flood defence strategy for river catchments” and the section that says “land that is required for current and future flood management will be safeguarded from development”. We can find no justification or explanation for this policy within the plan.

We would like more information on the definition of ‘washland’ as a concept. In flood risk management ‘washland’ is defined both as:

- an area of the floodplain that is allowed to flood or
- where it is deliberately flooded by a river or stream for flood management purposes.

Washland usually refers to an area which is deliberately flooded to protect people property elsewhere and that this requires a project to control the storage of water and its inflow and outflow into that storage area. This would usually be via an agreement with

the landowner or if the land was owned by the local authority. We would assume that this policy would require land to be clearly earmarked for a deliberately engineered flood storage scheme rather than more general designation of the floodplain.

*We would wish to see both the definition made clear and for consultation to be undertaken on any affected land (which should be clearly shown on any plan documents). This would give affected landowners given the opportunity to be directly informed and give them sufficient time to present their views on the proposals.*

## **FW2**

We agree that new development sites should have land earmarked for SUDs so that surface water runoff can be captured and managed. It is important that the downstream impacts of schemes are thoroughly investigated. This is particularly important as some local watercourses are suffering from a lack of maintenance which impedes their ability to cope with additional surface water flows. High peak flows and flash floods must also be considered as often the existing infrastructure cannot cope and an increase in impermeable surfaces may make this worse. It is vital that that adequate water resources and drainage capacity is available to cope with any new demands placed on the county's natural infrastructure.

## **NE1 Green infrastructure**

Farmers and landowners must be fully engaged with discussions on Green Infrastructure as they own and manage many of the districts key Green Infrastructure assets. For many farmers environmental management is a core business activity but this is not acknowledged by the document.

Previous studies have shown that agricultural businesses routinely invest in landscape management and enhancement works for example hedging, tree planting, cutting and grazing. For many farmers the landscape management and biodiversity enhancements on their farms are a source of great pride and it does them a disservice to not have this aspect of land management recognised by this document. Farmers who do not (for a variety of reasons) participate in agri-environment schemes also make valid contributions. The work of the Campaign for the Farmed Environment ([www.cfeonline.org.uk](http://www.cfeonline.org.uk)) has shown that these farms use a range of voluntary techniques to enhance the options and that this management is funded by farm businesses.

I hope that you find our contribution to the Consultation useful. The NFU is keen to assist the council with the development of planning policy so if you require further information or clarification of any of the points raised in this response please do not hesitate to contact me at the West Midlands Regional Office.

Yours sincerely

Sarah Faulkner  
Environment and Rural Affairs Adviser