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Date: 15th January 2023

To whom it may concern,

The NFU is the largest agricultural trade association in England and Wales representing farmers and growers. The NFU represents 55,000 farm businesses in England and Wales (417 in the East Devon Local Authority area) involving an estimated 155,000 farmers, managers and partners in the business. Our members businesses cover two-thirds of the agricultural land in England and Wales, producing high quality, high welfare food for consumers across the UK and beyond.

Farming businesses face a number of challenges in the years ahead, to not only continue to produce high quality food for everyone to eat, but also protect the environment and reach NET Zero by 2040. All with the background of a challenging financial situation, labour shortages in some areas; increased regulation and climate change. The local plan from East Devon District Council will play a key role in enabling and encouraging businesses in the years ahead.

The NFU does not have expertise or a view in a number of the policy areas, so we have limited our comments to the following sections:

- Strategic Policy – Climate Emergency**
- Strategic Policy – Promoting renewables and zero carbon energy**
- Strategic Policy – Suitable areas for solar energy development**
- Strategic Policy – Suitable areas for wind energy developments**
- Policy – Housing for rural workers**
- Policy – employment development in the countryside**
- Policy – Farm Diversification**
- Strategic Policy – Digital Connectivity**
- Policy – Areas of Outstanding Natural Beauty**
- Policy – Development on High Quality Agricultural Land**
- Policy – Habitats Regulations Assessment**

Strategic Policy – Climate Emergency

The NFU has a target for the agricultural vision for the farming industry to be Net Zero by 2040, which aligns with the target for East Devon. The farming industry has a key role to play in delivering this aspiration.

Strategic Policy – Promoting renewables and zero carbon energy

Renewable energy has a key role on farm, both in making a business energy resilient in its own right and in some situations also providing energy for wider society. One of the barriers that exists that has limited take up in some situations are limitations in the grid network and although not strictly part of the Local Plan, we would encourage East Devon District Council to do what ever it can to encourage investment here to increase the amount of renewable energy that can be delivered.

Strategic Policy – Suitable areas for solar energy development

Renewable energy production is a core part of the NFU's net zero plan and solar projects often offer a good diversification option for farmers. However, there is a need to strike a balance between food security and climate ambitions. It is important that large scale solar farm development is located on lower quality agricultural land, avoiding the most productive and versatile soils. Utilising roofs and farm buildings for solar should also be incentivised as it delivers a sustainable method of energy production while avoiding any land use conflict.

The NFU strongly encourages developers of large and super-large solar farms to follow existing best practice guidelines for multi-purpose land use (energy production, grazing of small livestock and agri-environmental measures). We believe that such land remains agricultural (and indeed may revert in the longer term back to other agricultural use), which is especially important in the absence of a much-needed statutory underpinning of food production.

Development proposals for solar should be considered in the context of the importance of the nation's food security and resilience. In this context the NFU's policy is that solar farm development and associated accommodation and conveyance works, should be located on lower-quality agricultural land or brownfield sites, avoiding as far as possible development on agricultural land of classification 1, 2, 3a (Best and Most Versatile land). Further, the NFU has a strong preference for developments which are roof mounted, so avoiding land take altogether.

Strategic Policy – Suitable areas for wind energy developments

We believe that the recent policies on wind development and what is currently proposed in the emerging Local Plan is too restrictive and skewed towards the concept of 'large scale wind farms'. The Low Carbon Study has made this same mistake and only mapped areas suitable for 500kW and above. Recent reports, such as the Devon Carbon Plan show an acceptance of wind by the public and it is important planning policy catches up with this.

There is a clear role and ability for farm businesses to install small turbines (20-50kW) and with the wind speeds in many areas could easily contribute 50,000kWh/year. This, when combined with solar could make a farm businesses energy independent, not only helping to secure its financial future, but also taking pressure off the grid and at certain times allowing it to provide energy back to the grid (where grid infrastructure allows).

We accept the concern and need for 'large on shore wind farms' to be controlled, but at the smaller end East Devon should take a leadership role and include small turbines within permitted development (like roof top solar). With current energy prices this would show real support to the areas farming industry and put a massive shot in the arm to the Districts Net Zero ambitions.

Policy – Housing for rural workers

Many farm businesses have the challenge of securing suitably qualified staff to work on farm. Alongside this in family farms there is often a lack of housing for the younger generation that are running the business and quite often they are having to live in the larger towns, where they can

afford a property (local villages are often too expensive) and travelling out to the countryside to work. This is not only counter intuitive to the sustainability argument with additional vehicle journey's, it also adds cost to a farm business and threatens animal welfare with the time it may take to get to livestock.

Therefore we support the specific provision for rural workers to allow the provision of a suitable property (either conversion or new build) on a farm business where a need can be clearly shown. We would be happy to work with East Devon District Council on the SPD in due course.

Policy – employment development in the countryside

Farm businesses will always need to develop and adapt in order to meet market requirements and also stay viable. This is not always 'intensification' as stated in the draft plan but may just be moving into a different part of the agricultural sector, which would require different infrastructure. Where a business can show a need to develop in order to remain financially viable it is important that the local plan can facilitate this or it risks contraction in agricultural businesses and a loss of employment.

Policy – Farm Diversification

With continuing pressures on agricultural commodity prices and significant cost inflation, where suitable some farm businesses will look for diversification opportunities in order to keep the farm business viable. Importantly it can also provide an additional income stream, which enables the younger generation to stay in the business which is important for the social fabric of our rural communities. We welcome this specific policy on farm diversification, but believe it is important to understand that it is hard to always remove all adverse impacts and these must be viewed objectively and not allowed to be weighted heavily against a proposal.

Strategic Policy – Digital Connectivity

Rural areas continue to suffer with a lack of connectivity (broadband and mobile), in the modern age this is a real barrier to business, resulting in a drag on efficiency. We welcome the recognition of the need for connectivity, but importantly this is not just for new development, there are large parts of the district which do not have an acceptable service so provision of new infrastructure to cover these 'not-spots' should be encouraged.

Policy – Areas of Outstanding Natural Beauty

Many of our members operate agricultural businesses within the AONB's and they greatly value the landscapes they live and work in. Within the landscape protection these areas are granted, it is vital that these farm businesses are allowed to develop where needed, in order to remain viable. Within this policy there should be specific provision for what agricultural businesses deliver for the AONBs in terms of landscape management and development that allows them to continue should have specific regard.

Policy – Development on High Quality Agricultural Land

Food security and securing the provision of an acceptable level of home produced food is critical for the nation and with future challenges and the impact of climate change this will only become more vital. Therefore as per this policy it is important that the local plan protects best and most versatile agricultural land wherever possible, so we have this land available for food production into the future.

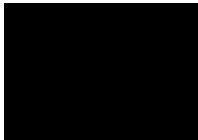
Policy – Habitats Regulations Assessment

Farm businesses are making significant investments in slurry storage across England, either to meet regulatory requirements or to future proof the business. This allows them not only to meet Environment Agency requirements on storage and spreading windows, but also make best use of what is a very valuable resource.

In many cases this is not an 'intensification' of a farm business but just better management of the resource that is already within the business. In these cases it should not be treated as 'development' as it will not have any 'additional' impact on phosphate loading in the catchment (as relevant to the Axe catchment).

Where businesses come forwards with developments to improve water quality these should be looked on positively.

Yours sincerely



Andrew Butler
Devon NFU County Advisor