



Agroecology and Planning Reform

A briefing paper for MPs, civil servants and planning authorities

August 2024

Summary

This policy briefing makes the case for reforming planning policy in England so that it is able to support genuine sustainable development across the nation and a transition to agroecology in our food and farming systems.*

We begin by laying out the multiple ways in which agroecology can help to meet government objectives with regard to public health, economic revitalisation, employment and the environment.

We then outline how current planning policy and its application serve to inhibit genuine sustainable development when it comes to food, farming and housing. Key areas that we have identified as needing specific attention when it comes to planning reform include: barriers to obtaining permission for rural worker dwellings, restrictive criteria for permitted development rights for smaller farms and market gardens, and rural development policy which allows for the proliferation of unsustainable factory farms.

We then highlight ten areas of policy change that would address these

barriers, including re-assessing the purpose of the green belt to include agroecological food production, extending permitted development rights to farms under 5ha, and preventing the expansion of intensive livestock units.

The briefing concludes by highlighting that agroecology can restore biodiversity and reduce greenhouse gas emissions, while at the same time increasing sustainable food production in urban, peri-urban and rural areas.

However, in order to create the right conditions for agroecology to flourish, we argue that policymakers must adopt a holistic and nuanced approach to land-use and planning which will promote economic vitality, while enhancing health and well-being for communities across the nation.

Our paper therefore highlights the need for the forthcoming Planning Reform Bill to be designed in tandem with a national Land Use Framework. This two-pronged approach will be necessary in order to create a regenerative and equitable land use system that will balance the need for good quality affordable housing with the need for a resilient UK food supply and thriving natural ecosystems.

**see page 5 for a definition of agroecology*

Contents

Introduction.....	3
What is Agroecology?	5
How can Agroecology Help Labour Meet its Objectives?	7
How Planning Limits the Potential of Agroecology	9
Low Impact Development, Rural Housing and Planning.....	10
Suggested Changes to Planning Policy	13
What Should the Planning Reform Bill do?	16
Unleashing the Potential of Agroecology through Planning ...	17



Introduction

We are a group of professional practitioners who are working together at the intersection of planning, food and farming, and low impact, regenerative settlement design. We have convened to support the new government -nationally and locally - to design and implement policy interventions that shift both thinking and practice towards a planning and land-use system which meets the need for housing and food supply while also restoring nature.

As organisations promoting agroecology, regenerative livelihoods, and affordable settlements within our important but degraded urban, peri-urban and rural landscapes, we are able to see the joined-up nature of issues such as public health, housing, food, farming and environment.

We outline here the changes to planning policy that we see as being necessary to support a rapid transition to a low carbon, high welfare, high biodiversity, food secure society.

We believe that the planning system is the key not only to better housing and energy but also to creating a consistent, healthy food supply, nature recovery, social equity and wellbeing.

The new government has stated that reform of the UK Planning system is necessary - and we agree.

A reform of our planning system would lay the foundations for a just transition to a nutritionally-secure and nature-rich country by supporting the widespread proliferation of agroecology at all scales.

This will enable everyone, regardless of background, to have access to healthy food, to secure, affordable, environmentally-sensitive homes; and to a direct connection with the natural world.

We understand that the government intends to increase the number of homes built each year to meet demand. While we agree that meeting the nation's housing needs should be a top priority for government, in our view, the scope of the proposed changes to the NPPF fail to grasp a vital opportunity to enable the shift towards a more sustainable agricultural system in the UK. This is a shift we will need if we are to succeed in delivering food security and nature recovery in the UK.

In this briefing we set out some essential changes to the NPPF, Permitted Development, as well as the future scope of the Planning Reform Bill and National Development Management Policies which will help to secure this shift.

Here we will introduce the tools and policy amendments needed to:

- Support rural growth with new livelihoods in horticulture, forestry and craft.
- Promote public health with high quality produce and deep nature connection.
- Address climate change by replacing carbon-intensive agribusiness with low impact, high-yield horticultural production.
- Increase biodiversity by supporting a rich matrix of habitats.
- Support a resilient food and timber system by shortening supply chains and reducing reliance on increasingly fragile global farming landscapes.



What is Agroecology?

Agroecology is a global practice, vision and collective movement that aims to deliver nutritional security for everyone, local economic resilience, and the restoration of living systems through networks of securely-housed landworkers who are valued, respected and appropriately rewarded.

While practically, it is the application of ecological principles to agricultural systems, it is much more than just a set of farming techniques. Agroecology is about fostering a reciprocal relationship between people and the natural world. It is place-based, and concerned with producing culturally appropriate food, fibre, fuel, timber and medicines for communities through systems which work in harmony with their local landscapes and ecosystems and which address injustices.

In practice, the UK agroecology movement includes farmers, growers, foresters, rural craft workers, food retailers and processors who are working to transition food, fuel and fibre production towards being climate friendly, biodiverse and fair. This aligns well with the Labour Party's objective to build:

"A new Britain, where wealth is created in every community. Where the golden opportunity of clean British power is harnessed for lower bills. Where your town centre has been revitalised and everyone feels safe to walk the streets. Where you can go to work and know you will be treated with dignity and respect. Where our children are equipped with the skills to thrive in the future. Where our NHS is once again at the cutting edge of healthcare. And where we show that politics can be about serving the country".¹

1. Labour Party Manifesto (2024). [My plan for change](#).



Joya Berrow



Joya Berrow



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How can Agroecology Help Labour Meet its Objectives?

1. Public health

Only 33% of adults eat the recommended five portions of fruit and vegetables per day, and just 12% of 11-18 year olds reach that target.² By contrast, evidence suggests that due to public engagement and connection with the farmer, customers who buy from agroecological farms tend to eat higher than average amounts of fruit and vegetables.³

Diets that are low in veg and legumes are responsible for 18,000 premature deaths in the UK each year. Annual UK costs from obesity related ill health are £18 billion, without including diet-related disease not related to weight.⁴

2. Economic revitalisation

Agroecology's focus on local enterprise and domestic food security has the potential to stimulate enterprise and keep money circulating in local and regional economies, rather than being spent on imported food and other goods.

2. *Tobi, R., Wheeler, A., Gurung, I. and Sutherland, J (2021) Veg Facts 2021. Peas Please - The Food Foundation.*

3. *Growing Communities (2023). Impact Report 2023. p6*

4. *Dimbleby, H. (2021). The Plan: National Food Strategy Independent Review (Click on The Report Download), p25*

3. Employment

Many people both young and old aspire to work in agroecological occupations, whether this is market gardening, forestry or farming, due to the values of environmental care, health and food justice that this work represents.⁵ Agroecology offers major employment opportunities for people of all abilities and skill levels, and volunteering on agroecological farms/market gardens can also operate as a bridge back into employment for people who have experienced mental health problems.

4. Climate change

Agroecological techniques aim to reduce greenhouse gas emissions, through replacing artificial fertilisers (which emit CO₂ in their manufacture and application) with composts and green manures (which build organic matter in the soil), sequestering carbon through planting perennial species in hedgerows, orchards, agroforestry strips and woodland, minimising tillage, (ploughing releases soil carbon into the atmosphere) and selling through local supply chains which reduce waste (and methane emissions), refrigeration and transport. Agroecology proposes a farming system that aligns with planetary boundaries. Livestock are a key global emissions source and agroecology practices integrate livestock into low impact mixed

farming systems, rather than the over stocking of industrialised livestock practices.

5. Biodiversity

Resilience comes from diversity, and agroecology systems seek to maximise diversity, not only of wildlife, but also domestic species of crops and livestock. Natural pest control and pollination are achieved by integrating wildlife and crops, making Agroecological farms places of beauty as well as productivity.

6. Resilient Food and Timber Supply

Agroecology seeks to reduce reliance on imports by building the capacity of local communities and regions to produce and distribute their own food and timber. With climate change causing water scarcity in some of the countries we rely on for fresh produce imports (e.g. Spain and Morocco), our public health requires a successful import substitution strategy. Meanwhile, the UK imports around 80 per cent of the timber it uses each year and we remain second only to China in the amount we import.⁶

5. Styles, G., Talks, I. and Tomlinson, H. (2022). [The Attraction of Agroecology, and the barriers faced by new entrants pursuing agroecological farming and landwork](#). Landworkers' Alliance
6. Forestry and Land Scotland (2023). [Timber Innovation for Forests of the Future](#). Forestry and Trades Journal.

How Planning Limits the Potential of Agroecology

1. Planning Barriers to the Agroecological Transition

Planning policy is a significant barrier to the transition of the UK to an Agroecological future. Where existing UK planning policy might facilitate Agroecology, opportunities are missed by local planning officers not understanding the differences between different methods of farming and land-use and how they do or don't align with broader government objectives relating to economic development, public health or climate change. There is a need for clear guidance from the government to help clarify a direction of travel and align planning authorities' application of planning policy with "the presumption in favour of sustainable development". In particular, affordable housing and built infrastructure for agroecological enterprises needs to be facilitated. Adapting the NPPF is a key opportunity to do this.

Planning policy for rural workers' dwellings has shifted from the detailed guidance of the Planning Policy Guidance 7 (PPG7) and Planning Policy Statement 7 (PPS7) to the simplified rural workers dwelling policy and practice guidance in the NPPF and National Planning Practice Guidance (NPPG).

Due to the lack of explicit policy, many planners and planning consultants revert back to Annex A tests, and applicants for rural workers' dwellings are forced to jump through unnecessary hoops to get permission. These tests do not reflect the needs of horticulture and agroecological land management. They do not support new entrants to farming and give little opportunity for housing which is affordable and appropriate to the needs of land workers.

The situation today is that agroecological farmers and landworkers struggle to access the housing and infrastructure necessary for their businesses to function efficiently. Potential businesses are deterred from even starting, due to knowledge of the planning obstacles they will face. These are enterprises which deliver (or would have delivered) a range of benefits, such as contributing to the local rural economy, local food resilience, improved wildlife habitat and carbon sequestration, in addition to being viable farm businesses.

At the same time, communities across the country don't have access

to the healthy food they need, and their environment is perpetuating unhealthy and unsustainable food behaviour. Existing planning policy is applied by local authorities in a way which is both rigid and inconsistent, so that permission for a home for a land worker can only be gained, if at all, at appeal, while planning permission is being granted for other developments which are undermining the presumption in favour of sustainable development or directly contradict the reasons given for refusal for rural workers' dwellings. The following points illustrate some of the barriers and contradictions experienced by agroecological practitioners.

Low Impact Development, Rural Housing and Planning

Attempts have been made in the past to bring planning policy in line with the principles of Sustainable Development, as set out in Agenda 21. Over the last thirty years, the Low Impact Development Movement, pioneered by The Rural Planning Group, Chapter 7, has defined "Fifteen Criteria for Low Impact Development", alongside providing planning advice and briefings for people seeking permission for low impact developments and proposing amendments to existing planning policy.

During this time, "Planning Policy Guidance 7: The Countryside - Environmental Quality and Economic and Social Development" (PPG7) (published in February 1997) was replaced by "Planning Policy Statement 7: Sustainable Development in Rural Areas" (2004) (PPS7). Annex A of PPS7 laid out policy 'tests' for rural worker's dwellings. PPS7 was replaced, along with all the other Planning Policy Statements in 2012 by the National Planning Policy Framework Statement (NPPF, originally published 2012, last amended in 2023), supplemented by the National Planning Practice Guidance (NPPG). Within the NPPG 'Housing needs of different groups' Rural Housing section, Paragraph 010 lays out considerations that it may be relevant to take into account when assessing the need for isolated homes in the countryside for essential rural workers.

2. Rural Workers' Dwellings

It is exceedingly rare to find housing that is genuinely affordable for people working in land-based occupations and located close enough for efficient management of their business. Historically, it has always been understood that farms need farmhouses. This is still the case, and applies not just to rural workers but also those running market gardens in urban and peri-urban areas.

There is a policy (NPPF Para 84) that allows for isolated homes in the countryside where

“there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside”.

Paragraph 010 of the NPPG adds that applicants may submit

‘evidence of the necessity for a rural worker to live at, or in close proximity to, their place of work to ensure the effective operation of an agricultural, forestry or similar land-based rural enterprise’

However, most local planning authorities refuse planning permission at initial application.

At issue is the question of what is meant by “essential need”, and most planning authorities take an outdated view, which ignores the economic reality of modern agriculture (which is largely reliant on subsidies) and assumes (wrongly) that small farms are

not economically viable and do not need someone resident to ensure their effective operation. It is possible for a small farm, especially market gardens (often operating without subsidy) to generate a significantly higher income per hectare than many large farms growing a commodity crop.

At planning appeals for agricultural workers' dwellings, HM Inspectors often grant that there is an essential need for a “multiplicity of tasks that would make it impractical to live elsewhere” but, due to the stress, expense and likely failure of planning appeals, unknown numbers of potential, sustainable rural businesses never get as far as winning a planning appeal. As a result, people shy away from becoming regenerative farmers and land workers.

3. Class Q Barn Conversions

Since 2014, Class Q Permitted Development has allowed certain agricultural buildings to undergo substantial works to convert them into habitable dwellings. In May 2024 the Class Q Permitted Development Right was doubled, and now allows up to ten dwellings (of 100 to 150 sq m each) with a maximum floor space for all new dwellings thus created of 1,000 sq. m. The people who buy or rent these Class Q conversions are not required to have any justification to live in open countryside, and can make as many car journeys to and from work, shopping, school or leisure activities in town as they wish.

By contrast, agroecological land workers seeking permission for rural workers' dwellings are required to meet extremely stringent tests for their essential need to live on site, when it is clearly more efficient for them to live on site than to commute from a nearby settlement.

An inherent contradiction lies in the fact that the planning assumption that it will always be better for people to live in a population centre where they can access essential services, to minimise traffic, is being applied to rural workers and not to those buying or renting barn conversions.

4. Permitted Development Rights

Permitted development also means that if your farm is 5 hectares or more, you have the right to erect, extend or alter a building and carry out excavations and engineering operations needed for agricultural purposes, although you may still require approval for certain details of the development.⁷ Unless they have been fortunate enough to inherit a farm, most agroecological practitioners will start out with a bare land holding or limited infrastructure, rented or owned, and frequently less than the 5ha necessary to benefit from most permitted development rights.

It is therefore necessary to put in a full planning application for all buildings and infrastructure necessary, whereas

farms of over 5ha can add up to 1500 sq m floor space buildings based on prior notification. Often planning applications are turned down, leading to a prolonged and expensive appeal process.

5. Intensive Livestock Units and River Pollution

The NPPF's text on rural development says:

"Planning policies and decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;

b) the development and diversification of agricultural and other land-based rural businesses;"

This has led to a shocking 20% increase in the number of intensive livestock units in the UK since 2016,⁸ including their being granted planning permission in very polluted catchments such as the Wye Valley, Norfolk and Yorkshire. This has led to significant river and air pollution issues. Some forms of food production - such as intensive livestock - will be in conflict with local climate emergency, biodiversity, pollution or nature recovery policies. The NPPF should support sustainable rural development specifically where it contributes to climate goals and agroecology, but not where it could worsen pollution issues.

7. See *"Planning Permission for Farms: Permitted development"* for further details

8. *Compassion in World Farming (2024) Marching for Nature*

Suggested Changes to Planning Policy

1. Re-assess Purpose of the Green Belt to Include Agroecological Food Production

Without a Land Use Framework, there is potential for agricultural land to be lost. There is a strong case for protecting agricultural land for food production around centres of population, to enable people to engage with local farms and market gardens through visits, volunteering or purchasing food directly from the farm and to ensure that food is produced within easy reach of markets. Such areas often coincide with the Green Belt and this should be made explicit by adding protection of agricultural land close to urban areas as a sixth purpose (para 143e, NPPF Dec 2023).⁹

Such a purpose should be supported with clear identification of land within the Green Belt to be protected for farming, so that landowners do not hold out for land prices that reflect hope value for future residential development, as part of setting

strategic objectives for its use, rather than the aim just being to maintain 'openness'. This would allow long leases so that finance for agricultural investment can be raised. Sustain's briefing on land use, "A Green and Pressured Land - making sense of the many competing demands for rural and peri-urban land", sets out recommendations on how to balance the many pressures on UK land.¹⁰

2. Remove Barriers for LowImpact Dwellings for Rural Workers

In the context of the national housing target of delivering 300,000 houses per year by the mid 2020s, it needs to be easier for agroecological businesses to gain permission to site or erect energy efficient, affordable dwellings on smaller farm sites; especially in relation to new entrants into agroecology. Recognition is needed that the effective operation of these enterprises is a composite of many different factors.

9. National Planning Policy Framework, para 143 The five purposes of the Green Belt
10. See https://www.sustainweb.org/blogs/jun20_green_and_pressured_land_report/ for the full report.

3. Extend Permitted Rights to Landholdings of Under 5ha

Acknowledge the trend for farms being broken up, and land being sold off with no buildings. When farms/smallholdings are starting from scratch they need barns, packing sheds, dairies, storage facilities etc and need to be able to develop without the delays and expense caused by planning negotiations.

4. Extend the Country House Policy to Encourage 'Exceptionally Sustainable Design'

Another exception to the isolated homes in the countryside (Policy 84e), which used to be called the "Country House Policy", allows such dwellings if "the design is of exceptional quality, in that it: is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area".

This policy should be extended to allow for Low Impact Developments which employ sustainable design principles (e.g. passive solar gain, use of renewable materials that sequester carbon -for example timber and straw; and renewable energy generation) to build affordable, low impact dwellings alongside an element of agroecological land management.

This would provide opportunities for people who do not want to work full-time in agriculture, but seek a semi-self sufficient lifestyle to build themselves an affordable, highly sustainable home. Precedent for this exists in the [Wales One Planet Development Policy](#), [Shropshire Council's Single Plot Exception Site](#) policy and [Cornwall Council's AL1 Climate Emergency DPD Guidance](#).

5. Remove or Amend the Class Q Conversion Policy

If farm buildings must be converted to housing they should be offered to local land workers for a proper period of time (eg. 3 years) at an affordable price before being sold out of land use.

6. A Text Permitting Rural Development

An edit to the text currently guiding planning policies and decisions, saying they should enable: *"The sustainable growth and expansion of enterprises in rural areas, where they contribute to sustainable development goals. Developments that support agroecology should be enabled"*.

7. Protection for Polluted Catchments

Specific text to protect habitats from unsustainable agriculture developments. There should be text setting out a presumption against granting planning permission to new intensive livestock units in polluted catchments, as supported by the recommendations of the Environmental Audit Committee, ie:

“There should be a presumption against granting planning permission for new intensive livestock units in catchments where the proposed development would exceed the catchment’s nutrient budget, unless evidence is presented of robust mitigation plans in place that are demonstrably effective in reducing the accumulation of phosphate and nitrate loads in soils and river sediments within sensitive areas in the catchment.”

8. Local Food Infrastructure

The processing infrastructure necessary to support a vibrant trade in local agroecological produce has been systematically eroded over the past few decades. Abattoirs, processing facilities, distribution centres and markets at the local level have been closed, in order to facilitate bulk transportation and the international supermarket chains. Sustain and RSPB in *The Case for Local Food* report, recommended that in a review of NPPF: ‘The most pertinent [recommendation] for encouraging shorter supply chains is to encourage a diversity of retail outlets including community shops,

markets and town centre food hubs, and the development of infrastructure to support short supply chains, such as abattoirs and processing for smaller food businesses’. Planning guidance should clearly support this.

9. Access to Healthier food

Retail is an established topic in local plans, yet access to good food can be problematic whilst unhealthy food is prolific in the high street. Planning policy should guide retail development, so that residents can live in “connected places” / neighbourhoods where shops/markets sell a range of food within walking and cycling distance, the development of food deserts is avoided, and unhealthy food, especially close to places where young people meet, is controlled. Food retail diversity should be encouraged to attract local/independent businesses.

10. Access to Food Growing and Cooking

All major new residential development should provide amenity space for communal and/or private food growing. They should be built with enough space for food storage, cooking and dining. The ability for building occupants to cook and eat on site should be addressed at design stage.

What Should the Planning Reform Bill do?

The Planning Reform Bill should be clear on the overall objectives to transition to the end of fossil fuel infrastructure, promote nature recovery and create new beneficial energy developments, whilst also protecting nature and allowing biodiversity to recover. This will require a nuanced approach.

- Land use is under pressure from numerous directions. At a high level, what is needed is a Land Use Framework in order to integrate these different pressures and create a framework for decision making that synthesises national and local needs.
- Good food growing land must not be lost for short term housing or energy infrastructure targets. The necessity of food security and the need to create resilient food systems which produce healthy food, means we must protect our best agricultural land for agriculture
- Encourage and facilitate eco-developments, self build housing schemes and CLT's to provide the housing that local people want and need, to be able to transition towards a greener, more just society.



Unleashing the Potential of Agroecology Through Planning

We welcome the new government's emphasis on climate change mitigation and provision of affordable housing. However, we would ask you to look further than housing and renewable energy as opportunities for addressing the climate emergency through planning.

Agriculture generates 11% of GHG emissions¹¹ and the industrial farming system has contributed significantly to biodiversity loss, poor public health, water and air pollution. By contrast, agroecology deliberately increases agrobiodiversity,¹² often sequesters more CO₂e than it emits, and aims to provide affordable healthy, culturally appropriate food for all, while enabling those who are interested to have access to dignified, land based work.

In reforming planning policy, we ask you to make changes that will address the issues outlined above, while taking a bold and holistic view of how planning can genuinely facilitate

sustainable development and a transition to agroecology.

The presumption in favour of sustainable development is an important foundation stone for National Planning Policy, and the time has come to activate its power through forward thinking and innovative planning policy that will unleash economic vitality, while enhancing health and well-being in all areas. Planning policy has the potential to connect urban, peri-urban and rural areas; food producers and all who eat food; land managers and people who enjoy spending leisure time in the countryside.

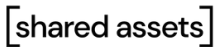
We ask that you will invite this coalition of agroecological organisations to be involved in the planning reform agenda so that we can contribute our experience and insights of the planning needs of landworkers and eco-builders, food, fuel and fibre producers, and all who seek an agroecological and just future.

11. Defra (2024) *Agri-climate Report 2023*

12. Agrobiodiversity includes not only natural biodiversity, which is encouraged for its own sake, and for the pest control, pollination and other functions it provides, but also crop and livestock diversity. Traditional, locally distinctive and disease resistant crop varieties are encouraged and promoted, through practices such as seed saving, while rare breed livestock is often chosen over modern hybrids, due to their different grazing habits or multipurpose function (e.g. sheep whose coloured or soft wool can bring an income or grazing habits favour rougher vegetation, as well as being valued for meat).

Forthcoming National Development Management Policies

As we outline above, planning reform is key to achieving a sustainable food system and there are many valuable insights that grassroots organisations can contribute. Please ensure that consultations on future changes to planning policy allow sufficient time for smaller, less well resourced groups to respond in a meaningful way.



THE LAND

