Responses to Island Planning Strategy Document (July 2024 version)

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I would comment on the draft document as follows :

Supporting the Rural Economy (Policy E4)

E4a – what is defined as 'growth'? . This policy should be more specific in recognising the need for larger , more efficient, holdings to expand their agricultural assets (farm buildings, infrastructure, etc) while allowing smaller, less efficient holdings, to be subsumed into the larger holdings. This later point will naturally release redundant buildings which smaller holdings may need to repurpose for non-agricultural uses.

What is the 'food production sector'? all farming and horticulture produces food. If this is intended to reflect food processing than, yes, that should be supported 'on farm' but it should be noted that on-farm food processing is a niche sector and should not be given priority above the need to allow for agricultural transition in amore general sense.

E4b – a large majority of farm diversification relates to farm buildings as well as 'farmland' . Farm buildings should be specifically referenced in E4b

E4c – expansion of existing rural industrial sites or employment sites is welcomed but this policy should be expanded to allow the creation of suitable new sites. Existing sites are often at capacity or incapable of being expanded and limiting expansion to 'existing' risks denying diversification to be applied more widely and keep rents at reasonable levels thereby also encouraging rural/Island employment/business growth.

E4d – the limiting of conversion to 'employment use' will stifle healthy farm diversification. The use should be expanded to include tourism and residential use. Allowing residential use could assist in achieving housing targets in rural areas.

E4e – The flexibility of new- build development (as opposed to building conversion) is welcomed.

E4f – encouragement of tourism and leisure are welcomed . Development of renewable energy sites should also be included both to allow rural business to decarbonise but also generate income from renewable energy as a form of diversification.

Land Quality : 'best quality' is not defined under E4 . A sense of proportionality should be applied here – the policy seems to indicate that, for example, a grain store might be allowed on 'high quality' land to serve the wider holding but a new-build diversified building to support the

holding would not. Holdings with high quality land still require the latitude to diversify and other policy factors (e.g. visual impact) may restrict them to applying on a small area of the holding which is designated ' high quality'. It is worth noting that the majority of 'low quality' land is within the Isle of Wight National Landscape (previously AONB) which suffers a further raft of restrictions on diversification and agricultural development and covers the majority of the Island.

8.55 – a good recognition of traditional and stone buildings no longer fit for purpose. The economic reality is that such buildings are extremely expensive to convert and , as such, the rental income achievable on the Island does not cover the investment required. While it may work in a minority of cases it would be more productive to expand this allowance to include residential use conversion either as the dominant use or in a 'mixed use' situation where workers can live on site and access work space without travel. Expanding to include residential use could assist the Island in achieving residential housing targets in rural areas.

8.56 – It is not clear why this point is limited to 'employment use', why not include tourism, leisure, residential and renewable energy. It is not necessary to refer to protective species in this point as such considerations are already dealt with within existing national regulations. It is also unreasonable to expect ' no impact' without context - indeed mitigation can be provided to enhance protected species and this should be considered as part of any application rather than a binary exclusion form development.

8.58 – this consideration of 'suitable site' should be expanded to include the development on 'high quality' soils if it cannot be avoided and also building reuse (should the 'type' of building' be restricted by policy in some way)

8.61 – this is an unnecessarily restrictive and counterproductive point. The vast majority of farm holdings on the Island have ' at cost and more modern structures'. Business use requires large commercial spaces which 'modern' farm buildings provide ; traditional buildings frequently fail to provide useful , modern work space. The policy should be focused on allowing farms to diversify their buildings and providing employment, tourism, leisure and residential uses to enhance the Island's rural economy. This policy aims to restrict the reuse of farm building to traditional stone barns – this is unviable and does not address either the need to diversify or the provision of what is demanded by the 'commercial tenant '. Reuse of buildings does need to be done sensitively but this policy point should be focused on re-use for diversification not an extreme focus on aesthetics alone. To name a specific make of building as unsuitable for conversion is discriminatory and badly judged. This policy point is directly in opposition to the policy proposed to allow 'new' commercial buildings under E4.

General points :

• The removal of Basic Payment subsidy from agriculture in 2016 has forced the industry into a rapid and substantial drive to transition the way it farms in an unsupported world. Food production in the UK is notoriously unprofitable and ,

in many cases, diversification is not simply 'extra profit' but the very means of business survival.

- A wide range of farm business diversification uses are already evident on the Island. The scope allowed needs to be wide to stimulate growth but also avoid sector competition by allowing a variety of uses the overall income to the rural economy will be higher.
- Allowing sensitive and appropriate <u>residential</u> re-use of redundant farm buildings is sound policy. Farmers will either convert farm buildings to provide much needed residential rental stock or sell the sites to reinvest in their holdings (many farms are woefully underinvested due to low profitability over many decades). This 'reinvestment' need could also make the farm holding more viable and , as such, reduce the need for wider diversification activity going forward.