

Forward Planning Dartmoor National Park Authority, Parke, Bovey Tracey, Newton Abbot, Devon TQ13 9JQ

Your ref:	
Our ref:	
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Date:	1 st November 2019

To whom it may concern

NFU response to Dartmoor Local Plan 2018-2033

The NFU is a professional body which represents the interests of approximately 75% of all farmers and growers. Our views are on behalf of the farming and land management sector in general. We are delighted to be able to respond to the local plan, as the policies will have massive implications for farmers across Dartmoor. Whilst we commend the document overall there are a number of aspects that should be redrafted in order to meet the needs of agriculture more fully.

As a first and important point. What is noticeable by its absence is any special mention of and consideration of "commons" and "commoners". The NFU has always regarded commons as the key driver for any action on Dartmoor and as such is the starting place for the delivery of Dartmoor's special qualities. If you can make commoning viable then the rest of Dartmoor becomes viable.

Special qualities – we agree with the special qualities but given that the landscape is special because of the way it is managed then we would like to see this at the top of the list. Context matters and this approach will help to ensure that the priorities and focus of delivery are correct.

The vision – we agree with the key aspects of the vision but would like to see the section on farming mention the production of food. The food grown on Dartmoor is high value and is the cornerstone of the special qualities of the area. It is also a large part of the pride of the farmers on the moor and this should not be discounted.

Strategic Policy 1.2

b) It is perhaps obvious to note that farm developments by their nature will be such that they are away from services and as such the occupants will need to travel. In addition tourist enterprises will be in the same situation.

d) The development and reuse of existing buildings on a farm is a high priority and must be addressed through planning policy. Current Permitted Development Rights do not apply on national parks and this creates a severe disadvantage for farmers.

3.9 rural workers dwellings

We appreciate that farming has been noted as having been a key factor in creating the landscape of Dartmoor that so many love and cherish.

On reading through these sections it is apparent that it does not recognise the pressures that farms are under. As such a new approach is required.

The key challenges the document fails to address and note include:

- 1. Farms are reliant on numerous income streams outside of just the core agricultural activities that underpin each and every farm.
 - a. Many farms across Dartmoor will have additional income from diversification. Often these will contribute more to the financial viability of the farm holding than the agricultural aspects. As such developing any financial plan with regard to a farm holding must acknowledge and incorporate this.
- 2. Farming family's structures are changing
 - a. We all now live longer and as such there are more members of a family on a farm now than ever before. Previously it would have been usual to have two to three generations present but now the norm is moving towards three to four
 - b. The need for accommodating all members of the family is still the same but their roles are all changing. As such we need to recognise this and plan for it. Planning for the past does not equip us for the future.

The SW NFU and its members recognise and support the purposes of the national park. Our members, who farm the area, are rooted in the history, cultural and landscape that we all cherish and where DNPA is charged *with "conserv[ing] and enhanc[ing] the natural beauty, wildlife and cultural heritage*". In addition, it is these same farmers who create the landscape and opportunities for the public to "understand and enjoy the special qualities of national parks". They cannot do this if they can't actually maintain a business and the social structures to do so. It is therefore imperative that DNPA becomes an enabler of change to meet the purposes but via the lens of the farmers that are the only people that can do this.

In speaking to farmers it is apparent that there are numerous 'pains' from their perspective with regard to the planning system in general and rural dwellings (and succession, diversification) in particular and also a number of 'gains' that could be made that would help improve farm businesses. These include:

- Putting detailed and costly plans together with no real understanding of likely success.
- Wanting to create living and working environments that are big enough to be livable and workable and enjoyable.
- Creating an offer for workers and future generations that means they will want to live and work on the farm and not find another career in another place.
- The number of hours that need to be worked is changing. Not only does work have to be contracted but also many farmers rely on diversified income (include off farm income) to maintain a farm holding.
- Enabling farm businesses to evolve. There isn't a lot of employment opportunity within Dartmoor and most of that which is there and could be there is from a farm.
- Increased farm viability in terms of financial through having staff available through to social in having greater ability to take off and improve health and wellbeing.
- There needs to be flexibility. It is very difficult to know what the farm will do in the future.
- If the planning process could be quick then there would be much more confidence in developing new business opportunities and with the DNPA itself. Farmers need to have clarity and surety and the current drafting appears to be very subjective.

All the farmers we spoke to point towards the planning process being hugely complicated and expensive. It cannot be done by a layperson and even the experts have mixed skill levels, understanding and success in navigating the nuances of planning.

Policy 5.5 and 5.6

The points made above for 3.9 pertain to this section too.

Farm diversification is becoming an increasingly important part of the farm income on Dartmoor and support for this is welcomed.

The NFU and its members are always willing to work with Dartmoor National Park in order to develop planning that supports farmers in their efforts to improve their business, deliver food security, natural capital and multiple public benefits. I hope that you find our contribution to the consultation useful. If you require further information or clarification of any of the points raised in the response please do not hesitate to contact me at the South West Regional Office.

As Prof Michael Dower said at the East Devon 50th AONB celebration in 2013, "The best way to sustain a landscape is to sustain in modern form the way of life that created it."

Yours sincerely

Paul Cottington Environment and Land Use Adviser