

BARRIERS TO SMALL SCALE HORTICULTURE DEVELOPMENT IN WALES



A review of actual and perceived barriers to the expansion of the Welsh Horticultural Sector as presented by the Planning System

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Glossary of Abbreviations	
CFS	Community Food Strategy
RED	Rural Enterprise Dwelling
OPD	One Planet Development
LPA	Local Planning Authority
CSA	Community Supported Agriculture
TAN6	Technical Advice Note 6
LDP	Local Development Plan
RTPI	Royal Town Planning Institute
LFA	Less Favoured Areas
SPG	Supplementary Planning Guidance

Barriers to Small Scale Horticulture Development in Wales As Presented by the Planning System

Executive Summary

Research was commissioned by Welsh Government in 2023 to investigate whether there are actual and/or perceived barriers to the development of small scale horticulture in Wales which arise from the planning system.

The research was carried out in the autumn of 2023, and comprised of a literature review, quantitative research through an online survey and qualitative research via interviews and discussions with growers, planners, and other horticulture sector stakeholders.







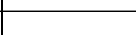






The findings concluded that there are both actual and perceived barriers to the development of small scale horticulture in Wales. However, we found no definitive evidence of bias within the planning system either against or for the sector, mainly due to the very small number of horticulture related planning applications which are submitted each year. The table below summarises the actual and perceived barriers that were identified in this research.

Barriers identified	Actual	Perceived
Complexity of the planning system	✓	✓
Time taken to submit applications, and receive outcomes from the applications	✓	✓
Level of bureaucracy	✓	✓
Cost of surveys and/or professional reports to support planning applications	✓	✓
Uncertainty over planning application outcomes	✓	✓

The small scale size of the sector and the relative lack of horticulture related planning applications was a recurring theme in the research and a contributor to the difficulties that horticulture enterprises have encountered when preparing and submitting planning applications. As businesses and individuals, those preparing the planning applications have little or no previous experience to draw upon; planning officers have had little experience of dealing with planning applications from horticultural enterprises, and even the “expert” consultancies providing specialist reports and surveys also have little experience of the horticulture sector. This level of inexperience by all parties has been highlighted as having a significant impact as it creates both actual and perceived barriers to successful planning applications, and thus in turn potentially inhibits the expansion of the sector.

The report offers some recommendations to address the actual and perceived barriers to the development of small scale horticulture. The table below summarises the recommendations into three phases, with the dashed line indicating preparation time,

and the solid line indicating implementation. The five recommendation headings are taken from the actions highlighted in the research specification. The explanation for the phasing level assigned to each recommendation is set out in the main body of the report.

Recommendation & sub-actions	Phase 1	Phase 2	Phase 3
To amend the Town & Country (General Permitted Development) Order 1995 to set a lower hectare limit for solely horticultural enterprises			
Review the 5-hectare threshold for permitted development rights to better accommodate the Welsh horticulture sector			
To suggest opportunities for the revision of Planning Policy Wales to put emphasis on the Welsh Government policy goal to increase small scale horticulture in Wales			
Inclusion of enabling language which articulates policy goals into Development Plans & planning updates, starting with Planning Policy Wales			
Make explicit mention of horticulture in Planning Policy Wales			
Update supplementary planning guidance to give better support to the expansion ambitions of the horticulture sector			
Update Technical Advice Note 6 to better support the policy objectives articulated in the sector vision and objectives			
Review of the planning criteria & ongoing monitoring conditions for One Planet Developments			
Engage with Our Food 1200 project in Bannau Brycheiniog regarding their intended supplementary planning guidance and wider application in other authorities			
To undertake other activities to raise awareness / educate planning authorities about the Welsh Government's policy to promote horticulture, including increasing understanding of its characteristics and needs			
Set out a vision for the horticulture sector, along with objectives (update the Action Plan for the Commercial Horticulture Industry in Wales, published in 2020)			
Fund or work with grower groups/stakeholders to create a publicity campaign to raise awareness about the sector amongst planning officials and local and park planning authorities			
To provide financial support for the planning fee and/or associated survey and report and professional fee costs which new and/or existing small scale horticulture enterprises face			
Pilot a funded programme to support with survey &/or report costs, using the International Trade Development Programme or Overseas Business Development Visit Grant as a model			
To provide an advisory support service for applicants (the aim being to supplant the need to hire a professional adviser and the cost that entails)			
Provide online group training for preparing & submitting planning applications or pre-recorded video training			
Develop CPD accredited Planning Officer training (endorsed by the Royal Town Planning Institute)			
Create awareness raising briefings for planning committees			

No timeframes have been assigned to these recommendations as these have been proposed for Welsh Government's consideration.

Overview and Context of the Research

Welsh Government's [Programme for Government 2021-2026](#) and The Co-Operation Agreement 2021 commit to develop a Community Food Strategy (CFS) for Wales, to encourage the production and supply of locally-sourced food in Wales.

This objective is also reflected in the ambitions for the planning system set out in Planning Policy Wales¹, acknowledging the role of food production and local distribution in initiatives such as placemaking and green infrastructure.

Proponents of horticulture, particularly “small scale” (operating on plots of less than 5 hectares) point out that it has the potential to be an important practical component of the community food strategy.

Welsh Government have defined policy objectives which seek to expand the horticulture sector by:

- increasing local production of fruit and vegetables aiming to improve security of supply and, in some cases, achieve a smaller carbon footprint;
- creating shorter, more local supply chains with better opportunities to add value, foster direct producer / consumer relationships, and build capacity to fulfil public procurement demand;
- providing employment opportunities - this is based on the findings that the ratio of workers to land area and agri output units is much higher than for other agricultural enterprises²; and
- ensuring sustainable land management through well-managed horticulture enterprises, both in terms of decarbonisation and maintaining ecology.

Planning Policy and the Horticultural Sector

Significant numbers of horticulture stakeholders have reported to Welsh Government that the need for planning permission to erect buildings, such as sheds, glasshouses, toilets, and other facilities is a significant barrier to both start-up enterprises and those wishing to expand their commercial operations.

This need arises because under the 1995 Town and Country Planning Order permitted development rights for new buildings do not apply to land holdings under 5 hectares.

The purpose of this research was to understand if there are actual and/or perceived barriers encountered by anyone trying to establish or develop small-scale horticulture (<5ha) as a result of planning requirements in this legislation.

Barriers cited by stakeholders include:

1. planning application costs associated with the planning application fees³;

¹ Welsh Government : [Planning Policy Wales](#)

² [Working-Paper-1-FINAL-TEXT.pdf \(cardiff.ac.uk\)](#), p.1

³ Planning fees are set by [The Town and Country Planning \(Fees for Applications, Deemed Applications and Site Visits\) \(Wales\) Regulations 2015 \(legislation.gov.uk\)](#) – see schedule 1, especially the table at part 2

2. the cost of preparing associated reports and surveys which often require professional support from specialist consultants and service providers;
3. a lack of understanding in planning authorities of the characteristics, operations, commercial business models and needs of small-scale horticulture resulting in frequent refusals of planning permission;
4. a reluctance to grant planning permission for horticultural structures or buildings which may be turned over to another unsuitable use if the enterprise goes out of business;
5. a general resistance to approve a sprawl of small-scale buildings across the landscape in areas where buildings have traditionally been concentrated around farmhouses;
6. the difficulty businesses encounter in both cost and complexity (and sometimes local opposition) of providing accommodation for horticulture workers whether by new erections or building conversion, and whether for temporary or permanent use.⁴ ⁵This is in the context of a lack of affordable housing in the areas close to the horticulture farms, along with the need to be living on site to attend to urgent issues arising from the cultivation of crops.

[Rural Enterprise Dwellings](#)⁶ (REDs) are permissible in the planning system for people who can prove they have a clear functional need to live next to rural enterprises, including erecting an additional house on a farm if needed to run a business. It includes provision for a temporary dwelling for up to 3 years (if the financial business case for an enterprise is not proven).

Whether temporary or permanent, all accommodation proposals have to be submitted to planning authorities. Welsh Government figures, quoted by the Country Land and Business Association to the UK Parliament, cite the number of successful REDs granted planning permission between 2010 and 2016 as 240⁷.

The research seeks to understand whether there is a low level of success for horticultural businesses seeking permission for REDs and if so, is this due to a lack of knowledge and understanding about horticulture businesses within local planning authorities or whether the functional need to live next to the business is insufficiently demonstrated either because it does not exist or has been poorly articulated in the application.

Scope of Research

The research has considered businesses and other enterprises, such as One Planet Developments (OPDs) and community supported agriculture, who are involved in the cultivation of horticultural crops.

There is 5 hectare threshold below which agricultural sites must obtain planning permission for production related structures, whereas larger concerns may be able to erect such structures under permitted development rights, subject to having a positive

⁴ Planning Reform to Create Sustainable Farming Livelihoods in the Countryside, Landworkers Alliance - [Planning-Doc.pdf \(landworkersalliance.org.uk\)](#)

⁵ Planning, Our Food 1200 - [Planning - Our Food 1200](#)

⁶ [Rural Enterprise Dwellings - Technical Advice Note 6 Planning for Sustainable Rural Communities](#) -

⁷ [HOP008 Evidence on Housing for Older People](#): see Point 26

response from their Local Planning Authority (LPA) to their submission of a prior approval notification⁸.

This 5 hectare metric has been used during the research to define small scale horticultural entities from large scale.

Research Objectives

The research objectives have been:

- To identify what specific issues prevent or dissuade anyone developing a small-scale (<5ha) horticulture business in relation to the town and country planning system in Wales.
- To distinguish and evidence the differentiation between perceived and actual barriers to establishing small horticultural holdings resulting from town and country planning requirements.
- To provide objective evidence as to whether the planning system is an obstacle to achieving Welsh Government policy goals regarding the growth of the small scale horticultural sector.
- To identify if there are other factors to consider which present barriers to this policy ambition.

The research has sought to identify influencing factors relating to:

1. The steps within the planning application process.
2. The decision-making processes within the planning application system.
3. The frequency of planning applications associated with horticultural enterprises.
4. Any variations in approaches to, and outcomes of, planning applications between or within LPAs, and what the causes of this might be.
5. The costs incurred when applying for planning permission for both operational structures and staff facilities, as well as dwellings for rural workers. This aims to include a breakdown of the components of these costs; including planning fees, professional services engaged, and specialist surveys and impact reports commissioned in support of applications.
6. Determining if these costs relating to obtaining planning permission are a critical barrier to someone developing an enterprise.
7. Identifying other barriers associated with the planning process.

⁸ The Town and Country Planning (General Permitted Development) Order 1995 PART 6 and Technical Advice Note 6 (TAN6)

Research Methodology & Engagement



Figure 1 Research Methodology and Engagement

Desk research was conducted to clarify the context of the research, including planning regulations, statutory instrument planning advice, and research papers and opinion pieces relating to the planning system in Wales.

Stakeholder organisations in the horticultural sector within Wales were identified to approach for online interviews. Many of these organisations have had extensive interactions with individual growers regarding the planning application process, including providing one to one and one to many support and advice. They were also knowledgeable about key factors and issues pertaining to this topic, based on the experiences that small scale horticultural growers have reported.

Researchers interviewed individual growers across different geographical areas and within a variety of horticultural sub-sectors, to gain an understanding of their first-hand “lived experience” of the planning system.

All interviews were conducted using semi-structured question templates, adapted to the organisations or individuals as appropriate, to allow insight to be gathered in a consistent manner.

Further detailed desk research was undertaken to interrogate the online, publicly available Planning Application Portals of certain LPAs who had been identified as having larger numbers of horticultural enterprises within their jurisdiction. Agricultural Notifications, and Full Planning Applications relating to Horticulture, One Planet Developments and Rural Enterprise Dwellings were reviewed for 2020, 2021 and 2022 and, where evidence was available, Agricultural Notifications specifically relating to horticulture were identified. Applications from 2023 were excluded, as research revealed that a decision was still pending for some of these applications.

Engagement was then conducted with Local Planning Authorities to gain their perspective and insight.

In October 2023, a quantitative online survey was conducted to which 49 growers across Wales responded, allowing us to understand the wider picture of experiences and views.

Research Findings

Typical structures requiring planning permission

A range of structures for which small scale growers might seek planning permission were identified and categorised as below.

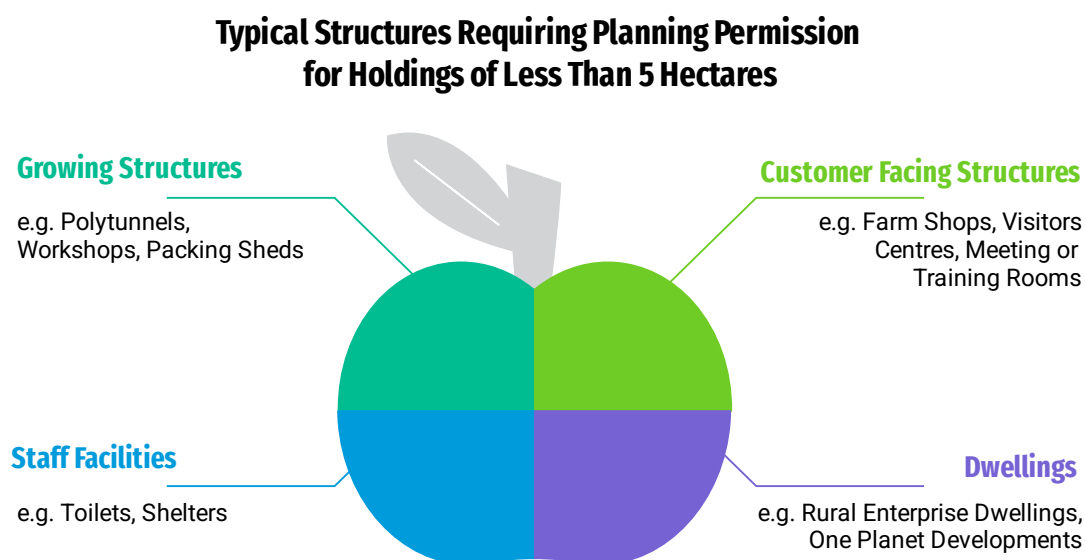


Figure 2 Typical Structures Requiring Planning Permission by Small Scale Growers

The online Grower Survey indicated the relative occurrences of these structures, with growing structures and OPDs the most popular reasons that growers had submitted planning applications.

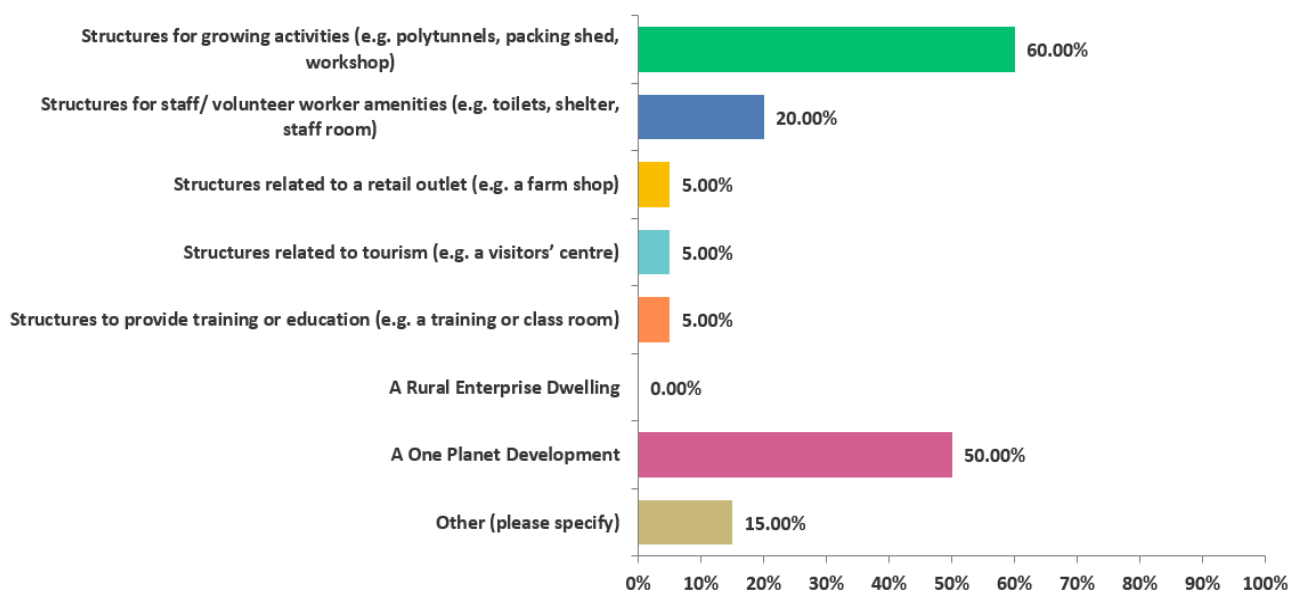


Figure 3 Structures for which Planning Permission has been sought

For those growers considering making an application, growing structures and REDs were the most popular reasons for their prospective applications.

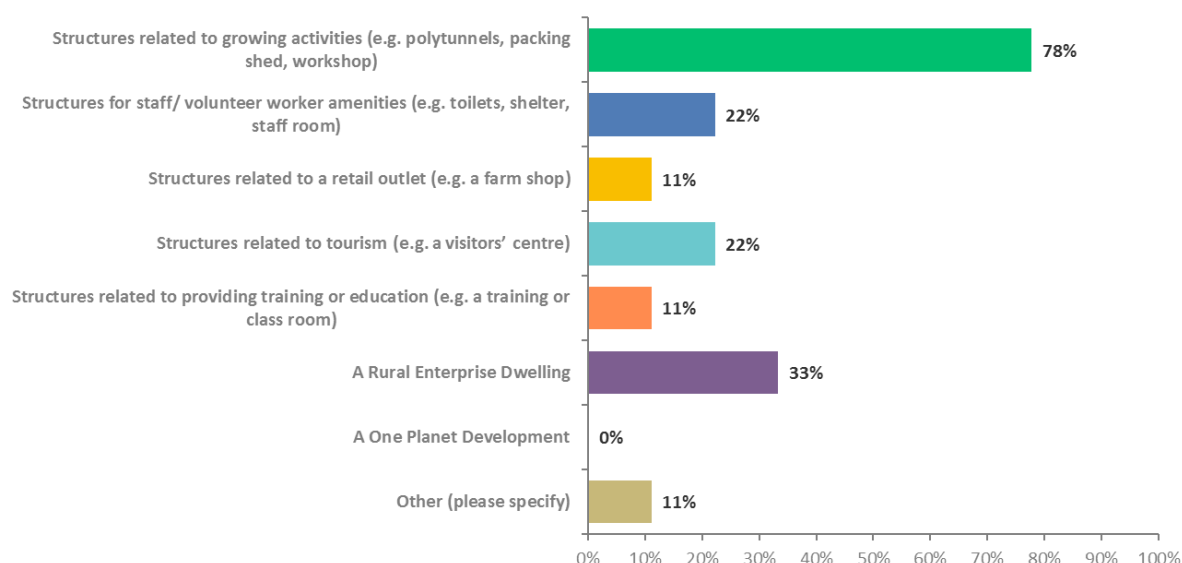
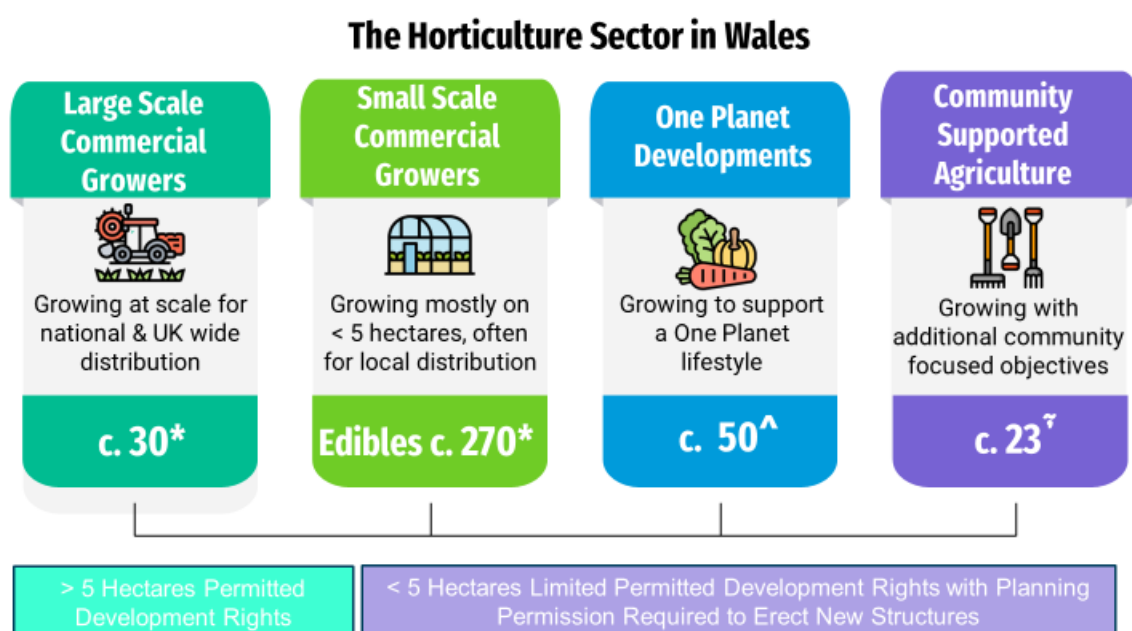


Figure 4 Structures for which Prospective Applicants intend to apply for Planning Permission

Size of the Welsh horticultural sector

One key and recurring observation from the research has been the relatively small size of the horticultural sector in Wales.



Sources : * LANTRA – there are a further 200 ornamental horticulture growers , ^ One Planet Council, [†] CSA UK

Figure 5 The size of the Welsh Horticulture Sector

Land in Wales designated as used for agriculture is dominated by livestock farming.



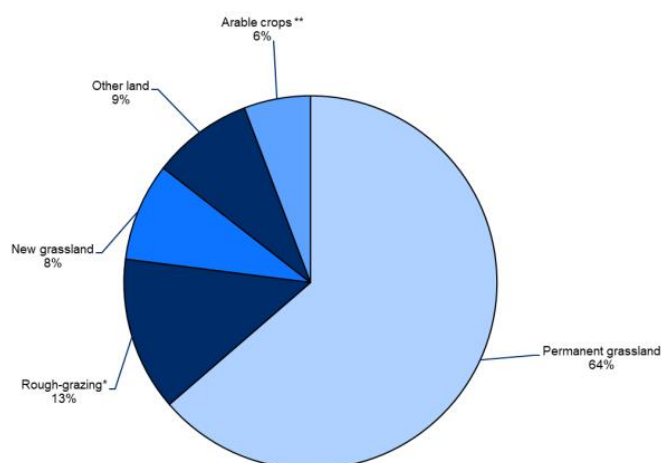
90% of the land area of Wales is given over to farming. The nature of this land means that it is mostly used for rearing sheep and cattle.

Information about farms is collected by The Welsh Agricultural Survey whose estimates for agricultural land use, in June 2022, indicate farm holdings of 1,765,300 hectares. An additional 180,300 hectares identified as common rough grazing, used by multiple farmers, reveals that land used for agricultural purposes accounts for 90% of the total land area of Wales.⁹



The area of cereals grown in Wales accounts less than 3% of the total agricultural area.

There were 100,400 hectares identified as assigned to arable crops in June 2022, of which just over 55,000 hectares is cereals. So when the overall breakdown of the farming sector is considered, the small size of the horticultural sector is revealed.



*Rough grazing where holder has sole rights (ie excludes common rough grazing)

** Includes horticulture (vegetables and fruit grown in the open, hardy nursery stock and glasshouse)

⁹ Statistics for Wales: June 2022 Survey of Agriculture and Horticulture: Results for Wales (November 2022)

Agricultural Notifications and Planning Applications

Horticultural enterprises can freely grow their choice of crops on agricultural land without this constituting a change of use - for example no permission is required to shift from growing cereals to brassicas or potatoes. However, if they wish to erect a structure associated with their growing, then they must abide by Part 6 of the Town and Country Planning (General Permitted Development Order) (Wales) 1995 which sets out the permitted development rights and requirements to apply for planning permission as they pertain to agriculture.

TAN6 (Technical Advice Note 6) Planning for Sustainable Rural Communities issued in July 2010 further clarifies how planning matters relating to agriculture should be approached in Wales.

Larger sites over 5 hectares have greater ability to proceed with erecting structures by submitting an agricultural notification, which is then assessed by the relevant planning authority, who advise, within 28 days, whether the applicant can proceed under their permitted development rights. However, holdings between 0.4 and 5 hectares are required to obtain full planning permission to erect new structures.

The small size of the horticultural sector in Wales already observed was further emphasised by research into the number of these agricultural notifications and planning applications made by the sector.

Research was conducted into the number of agricultural notifications received by Pembrokeshire County Council, Pembrokeshire Coast National Park, and Powys County Council in the three-year period 2020, 2021 and 2022.

These three planning authorities were selected to represent areas where there is respectively a high (Powys) and medium (Pembrokeshire) proportion of agricultural land within the total area.

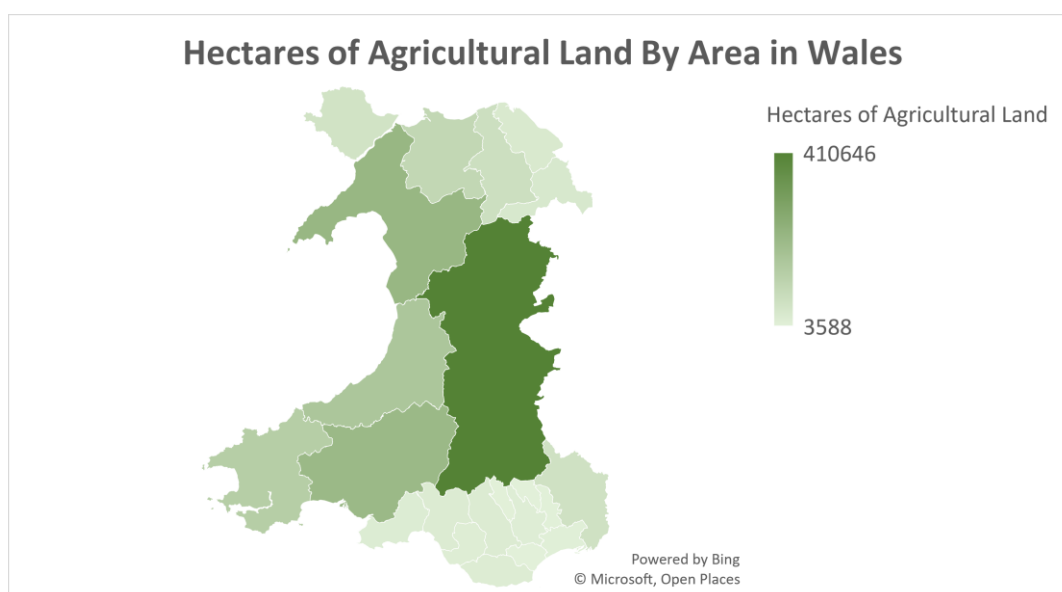


Figure 6 Hectares of Agricultural Land By Area in Wales. Source Stats Wales

The Research revealed the low number of agricultural notifications and planning applications received relating to horticulture.

Agricultural Notifications

Date Validated	Agricultural Notifications		
	Total Number	Relating to Horticulture	Relating to Horticulture (%)
Pembrokeshire County Council			
01.01.20 - 31.12.20	30	1	3%
01.01.21 - 31.12.21	21	0	0
01.01.22 - 31.12.22	26	1	4%
Pembrokeshire Coast National Park			
01.01.20 – 31.12.20	10	1	10%
01.01.21 – 31.12.21	19	3	16%
01.01.22 – 31.12.22	7	1	14%
Powys County Council			
01.01.20 - 31.12.20	104	2	2%
01.01.21 - 31.12.21	117	0	0
01.01.22 - 01.12.22	96	1	1%

Figure 7 Agricultural Notifications Pembrokeshire County Council, Pembrokeshire Coast National Park & Powys County Councils 2020-2022

The number of Agricultural Notifications is shown in Figure 7 above. The number of Full Planning Applications relating to Horticulture, One Planet Developments and Rural Enterprise Dwellings is shown in Figure 8 below.

- (i) A total of 77 agricultural notifications were submitted to Pembrokeshire County Council, 36 to Pembrokeshire Coast National Park, and 317 to Powys County Council in the three-year period 1 January 2020 to 31 December 2022.
- (ii) The higher number of agricultural notifications submitted to Powys County Councils is likely to reflect the larger geographic area of Powys and the importance of the agricultural sector to the county.
- (iii) Over the three-year period, Pembrokeshire County Council determined that 23% of the agricultural notifications required planning permission, Powys County Council determined that 18% of the agricultural notifications required planning permission whereas Pembrokeshire Coast National Park determined that only 3% of agricultural notifications required planning permission.
- (iv) The number of agricultural notifications relating to horticulture submitted to the authorities is low, with only two submitted to Pembrokeshire County Council, five to Pembrokeshire Coast National Park, and three submitted to Powys County Council in the three-year period.

Planning Applications

Full Planning Applications							
Date Validated	Total Number	Relating to Horticulture	Relating to Horticulture (%)	One Planet Developments (OPD)	OPDs (%)	Rural Enterprise Dwellings (REDs)	REDs (%)
Pembrokeshire Council							
01.01.20 - 31.12.20	617	4	0.5%	3	0.5%	4	0.7%
01.01.21 - 31.12.21	763	3	0.4%	3	0.4%	1	0.1%
01.01.22 - 31.12.22	613	4	0.7%	2	0.3%	5	0.8%
Pembrokeshire Coast National Park							
01.01.20 - 31.12.20	303	1	0.3%	2	0.7%	1	0.3%
01.01.21 - 31.12.21	420	2	0.5%	0	0%	2	0.5%
01.01.22 - 31.12.22	397	3	0.8%	2	0.5%	1	0.3%
Powys Council							
01.01.20 - 31.12.20	603	3	0.5%	1	0.2%	8	1.3%
01.01.21 - 31.12.21	633	2	0.3%	1	0.2%	21	3.3%
01.01.22 - 01.12.22	547	2	0.4%	None	0%	12	2.2%

Figure 8 Full Planning Applications Relating to Horticulture, One Planet Developments and Rural Enterprise Dwellings : Pembrokeshire & Powys County Councils 2020-2022

- (i) A total of eleven out of nearly 2,000 (just 0.55%) Full Planning Applications which directly relate to horticulture were submitted to Pembrokeshire County Council, six out of 1,120 (0.53%) to Pembrokeshire Coast National Park and seven out of 1,783 (0.4%) to Powys County Council in the three year period 1 January 2020 – 31 December 2022.
- (ii) Eight One Planet Development applications were submitted to Pembrokeshire County Council, four to Pembrokeshire Coast National Park and two to Powys County Council in the same period. Of the eight submitted to Pembrokeshire Council, three received conditional approval, all four applications submitted to Pembrokeshire Coast National Park were approved (one on appeal), and of the two submitted to Powys, one was withdrawn and one refused.

(iii) Ten Rural Enterprise Dwelling applications were submitted to Pembrokeshire County Council, four to Pembrokeshire Coast National Park and 41 Powys County Council in the same period.

(iv) One of the Rural Enterprise Dwelling applications submitted to Pembrokeshire County Council related to horticulture. The desk research did not identify any Rural Enterprise Dwelling applications relating to horticulture submitted to Pembrokeshire Coast National Park or Powys County Council in the three year period.

These low levels of horticultural planning applications were confirmed by Local Authority Planning interviewees as being representative of the common experience. Detailed information was received from Bannau Brycheiniog National Park which showed that, in the three year period January 2020 to December 2022, the authority received 55 agricultural notifications, two of which related to horticulture. The authority also received eight full planning applications relating to horticulture, five of which were for personal rather than commercial use. Even planning officials with over 20 years of experience in their profession could recall very few specifically horticulture related applications. Several did note, however, experience of enforcement issues, where structures had been erected or people were living on horticultural sites without planning permission.

Consequences of the Small Size of the Sector

The small size of the sector is significant, as it appears to have numerous consequences related to the planning application process:

1. Planning applicants from the horticultural sector may only make one or two planning applications in their career. This means that the majority of them have little or no experience of the process and are having to either “learn as they go” or pay for the services of planning professionals.
2. However, because the incidence of horticultural applications is low and sporadic, many planning experts, who are very familiar with planning matters in the broader rural, livestock and other more “traditional” farming sectors, have little prior experience of the nuances of the horticultural sector.
3. Some growers and stakeholder organisations have shared examples of finding it difficult to find suitably experienced professionals and also of having been given incomplete or poor-quality advice. They highlighted that this had led to them spending significant sums and making decisions based upon flawed or inadequate information, and not achieving a successful and/or cost-effective planning application.
4. In addition, some growers reported that, as their project was relatively small compared to major developments, service providers de-prioritised their case, adding delays, or passed it to inexperienced graduates in the business, who were not able to offer the best quality advice or service. The online Grower

Survey revealed that around one third of growers had had difficulties finding service providers.

5. The low number of horticultural applications, spread right across the country means it is difficult for Planning Officers to build up their experience in the sector. This difficulty was corroborated by the planning officials to whom we spoke.
6. Equally, in discussions with growers who have put their case to Planning Committees, and the horticultural advocacy groups, they reported that the members of the planning committees have little experience of assessing applications from the sector, and exhibit a low level of understanding, and even negative perceptions, of the sector. For example, OPD applicants had watched the webcasts of planning committees and observed committee members expressing the view that OPD is a policy for incomers and a loophole for certain demographics, with planning officers being put under political pressure from councillors who are opposed to OPD.
7. One senior planning policy officer commented that “committees can be a law unto themselves” in respect of their approach to growers, particularly OPD applicants, and several planning officers interviewed noted that awareness of the benefits and role of the horticulture sector needs to be better explained and promoted to planners and committee members alike.

Barriers Identified by Growers

The grower interviews and survey responses highlighted areas in which they felt the planning system was hindering their ability to expand or enhance their horticultural businesses because they required planning permission to erect structures.

Barriers Associated with Planning Identified By Small Scale Horticulture Enterprises

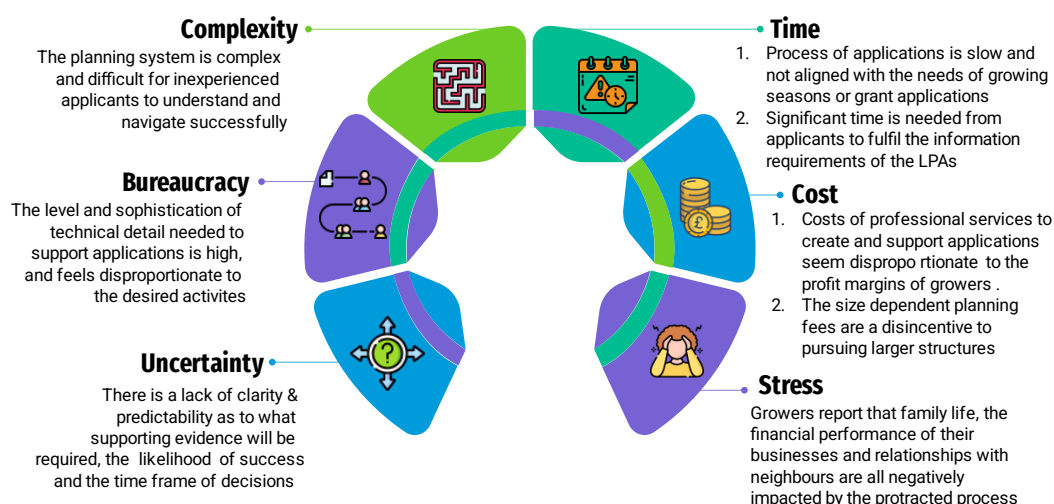


Figure 9 Planning Barriers Identified By Small Scale Growers

Complexity

Inexperience with the planning system leads to the feeling that it is complex and challenging to navigate.

The Planning Teams interviewed observed that this low awareness of the planning system has the effect of lowering the quality of applications, leading to delays in processing them.

75% of survey respondents who had submitted a planning application stated they had had some (55%) or severe (20%) difficulties completing the planning application, suggesting this presents an **actual barrier**.

All of the respondents (100%) who were considering making an application stated that they were somewhat (66.7%) or very (33.3%) concerned about understanding the whole planning process. This suggests that there is also a **perceived barrier** regarding the complexity of the process.

Time

The amount of time that growers felt they had had to dedicate to completing the application and associated documentation was high and difficult for them to achieve, especially in the busiest growing seasons.

A further complaint was that the lack of visibility as to when an application decision would be reached made business planning problematic. None of the growers interviewed had received a decision within the 8 weeks specified in the planning legislation, and even the 16 weeks allowed when an Environmental Impact Assessment was required was not common.

The online Grower Survey explored the time that applications had taken to reach a decision. Only one respondent (in the Pembrokeshire Coast National Park) had received a decision in the statutory 8-week period and 75% of decisions took over 10 months (including 6 out of 9 commercial enterprises). Of these, 50% of decisions took over 18 months (4 of which were commercial businesses). The timescales stated ranged from 22 months and 2 to 3 years was not untypical.

This has presented problems for growers who had applied for planning permission with the intention of erecting a growing structure in time for a specific seasonal activity – such as sowing or harvesting crops. For example, if the planning permission decision for a polytunnel was not reached by the time needed to sow the crops within it, then an entire year's production would be lost.

This strongly indicates that the slow progress of applications from submission to decision is an **actual barrier** to growers expanding their horticultural outputs.

Equally, of prospective applicants, 100% were either very concerned (77.8%) or somewhat concerned (22.2%) about the time that an application would take, suggesting it is also a **perceived barrier** to expansion of the sector.

One further point pertinent to the expansion of outputs in the sector also came to light during the grower conversations. Some growers had applied for grants under the

Horticultural Development Scheme¹⁰ which were dependent on them getting planning permission. However, it had not proved possible to coordinate the grant timescales with the planning application timeline. Equally, even when some growers had been awarded a grant, they were not able to take it up because they had been set certain conditions within the planning decision. This meant that what they were allowed to do under planning conditions now varied from what they had applied for under the grant. It was reported that the grant is inflexible and unable to be amended to reflect the new circumstances created by the planning system. This contrasted with the better experience of one grower organisation who had secured charitable funding, and the foundation providing the funds were amenable to varying the scope of what the funds were used for to align with the planning outcome.

Bureaucracy

Growers voiced the opinion that the level of documentation, reports, surveys and supporting documents required for their planning application seemed disproportionate to what they wanted to do. For example, “I just wanted to put up a polytunnel, not build a block of flats”. Discussions with the Planning Authorities confirmed that the process and requirements are the same for both scenarios because they are subject to the same due process.

In the online Grower Survey, 80% of previous applicants stated that they had encountered some (60%) or severe (20%) difficulty providing assessments, reports or surveys required by the planning authorities. Equally, all (100%) of prospective applicants were either somewhat (44.4%) or very concerned (55.6%) about providing this supporting evidence. This suggests that the amount of documentation, reports and surveys is **both an actual and perceived barrier**.

Cost

In the grower interviews, concerns about costs were focused less on the planning application fees and more on the costs of the supporting professional services, surveys and reports needed to accompany applications. (Please note it was not specified whether figures below include VAT.)

There was an assumption by planning officials interviewed that the reduced basic fee of £85 for agricultural related applications was very good value for money.

However, the online Grower Survey showed that only 5% of applicants had applications that were charged at this below £100 level, 12 of the 19 applicants had incurred costs over £501, with the highest incidence being the £1,001 to £2,500 bracket.

¹⁰ Welsh Government : [Horticulture Development Scheme](#)

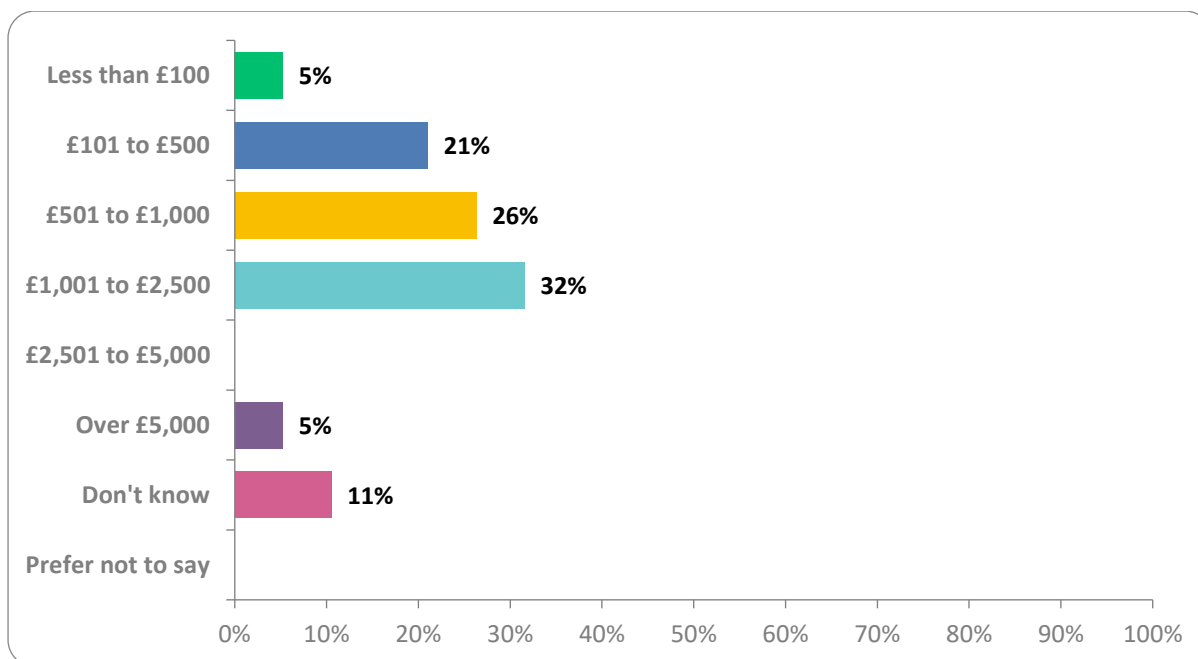


Figure 10 Planning Application Costs incurred by Small Scale Growers who had submitted Planning Applications

70% of growers stated that the cost of planning application fees caused them some difficulties, and a further 5% severe difficulties.

One aspect that emerged from reviewing costs from service providers is that few offer fixed fees but charge depending on the extent and scope of the work needed. This can mean that growers do not know at the outset what costs they will have to meet during the process. This issue is compounded when the planning officers come back to growers throughout the process, requesting more detailed or new information relating to their application. This can occur across many months as the application proceeds and is assessed by the various statutory bodies and stakeholders involved throughout the planning process. This creates difficulties in budgeting for costs being incurred.

The online Grower Survey showed that the service providers most frequently engaged by applicants were Planning consultants (85%), Architects (70%) and Ecological/ Environmental consultants (65%) for which costs of between £501 and £2,500 were most prevalent, in a few cases fees paid were less than £500 but in others this was as high as between £2,501 to £5,000.

45% of growers had required Highways and Drainage or Water management advice and these additional costs also ranged from below £500 up to £5,000.

Few applicants had consulted either a business or legal advisor, but the person who did engage a legal advisor incurred costs of over £5,000.

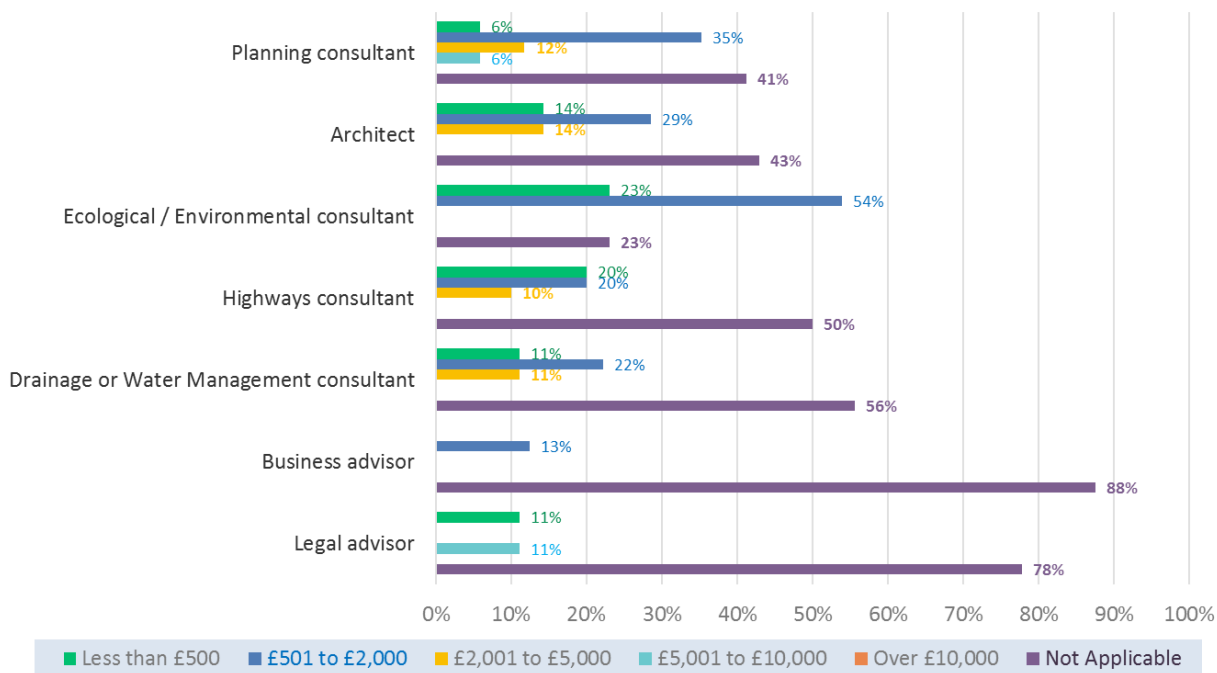


Figure 11 Service Providers consulted by Horticultural Planning Applicants and Associated Costs

Concerning these fees for professional services and evidence reports, 65% of growers who had made applications said they had caused them some (40%) or severe (25%) difficulties due to the costs and the inability to predict the level of costs that will be incurred throughout the process.

One further aspect of the cost of applications highlighted by growers was the loss of income, and associated profits, suffered whilst waiting for planning applications to make their way through what, the evidence of the online Grower Survey shows, is often a protracted process.

In this survey 50% of previous applicants stated this loss of income caused them severe difficulties, with a further 30% experiencing some difficulties in this regard.

Regarding prospective applicants in the online Grower Survey 100% of them indicated similar concerns towards both the planning application fees – 44.4% being somewhat concerned and 55.6% very concerned – and the costs of associated assessments, reports and surveys – 33.3% being somewhat concerned and 66.7% very concerned.

Again this would seem to indicate that the direct and indirect costs represent both **actual and perceived barriers** to horticultural planning applications.

Uncertainty

The level of uncertainty that growers experienced during the process stemmed from not knowing:

1. what extra information they would be asked to provide, and several growers stated that the requests for more supporting evidence were made piecemeal over a protracted timescale;

2. how long the decision-making process would be;
3. whether they would be successful.

This made it challenging for them to make business decisions, such as committing to new customers, raising finance and defining crop plans.

The online Grower Survey confirmed that communications with the Planning Authorities/process was a source of difficulties, 65% stated they had had some difficulty and a further 35% severe difficulties in this respected.

This sense of uncertainty may be compounded by the perception of previous applicants that difficulties arose because of a lack of knowledge and awareness of the horticultural sector amongst both the Planning Officers (40% some difficulties and 45% severe difficulties) and Planning Committees (47% some difficulties and 23.5% severe difficulties).

Prospective applicants all had concerns about their potential interactions with the planning authorities. These ranged from not having the opportunity to explain their application in person (66.6% somewhat concerned and 33.3% very concerned), that Planning Officers would lack knowledge and awareness of the horticultural sector (33.3% somewhat concerned and 66.6% very concerned) and that this lack of knowledge and awareness would apply to Planning Committees (44.4% somewhat concerned and 55.6% very concerned).

This would indicate that interaction with the Planning Authorities may be both an **actual and perceived barrier** to growers making successful applications.

Stress

All of the above issues resulted in growers interviewed stating they had a negative experience of the planning system, raising stress levels and for family-run businesses, this was noted to have had, or be having, a detrimental impact on their family life.

Local Planning Authority Perceptions of the Horticultural Sector

Online interviews were conducted with senior planning officials from nine Planning Authorities. These were located across Wales, with a cross section of rural, urban and mixed jurisdictions. See the Appendix for a list of these authorities.

Low Awareness

None of the LPAs interviewed felt they were aware of specific Welsh Government policy goals to expand horticultural outputs, however one or two stated they were “vaguely aware” of a desire to promote food produced in Wales.

Equally, none of these authorities felt that these policy objectives were explicitly reflected in their LDPs (Local Development Plans), Strategic Development Plans or even the National Planning Policy. The expression “policy vacuum” was mentioned spontaneously by more than one authority, in regard to the topic.

Likewise, they felt that their own awareness of the horticultural sector was very low, primarily due to the low level of interactions that they experience with the sector.

Planning officials observed that this lack of knowledge was often replicated in the lack of awareness from applicants as to the nature of the planning system and how best to approach and evidence an application. They noted that this mutual lack of understanding introduces the risk of “everyone involved being on the back foot, creating a negative atmosphere and the scope for conflict”.

Role of Planning

The complex role of planning was highlighted, as sitting “as part of a wide range of interconnected policies” and leading to the need to balance numerous interests within the parameters set out in the regulations.

Planning officials were clear about the importance of their role as guardians of the landscape, and as protectors of its visual and environmental characteristics. This included following the policy that development should be avoided in open countryside, and clustered near existing settlements or buildings.

They highlighted their duty to ensure that the best quality land remains in agricultural production and is not lost to buildings and other non-agricultural development.

Most planners interviewed expressed the view that agriculture **is** supported within the current planning provisions, with it having its own defined permitted development rights and application fees structures.

Those LPAs interviewed who have assessed agricultural notifications stated that most requests they receive are from holdings over 5 hectares and proposals are allowed under permitted development rights, although some may have conditions attached if it is felt these are needed to prevent adverse impacts on the countryside.

All authorities interviewed confirmed that they understand horticulture to be included within these agricultural provisions. Several mentioned that they feel that “genuine”, “well presented” and “suitably evidenced” applications from small scale < 5 hectare

holdings would be granted, provided these met the requirements of current policies and legislation.

Wary of Abuse

Experience at the sharp end of determining and enforcing planning decisions has made the planning professionals interviewed wary of the scope for and likelihood of abuse.

This means that the functional need, time, and financial tests stipulated in planning guidance are likely to be rigorously applied to small scale horticultural applications.

They observed that, regarding horticulture, this abuse might come in several forms, including:

1. Growers ignoring the planning system and erecting polytunnels or moving onto land to live in caravans without planning permission – requiring protracted enforcement actions. One authority, who has had interaction with growers, mentioned they perceived that some growers have adopted a position of “moral superiority” and feel that because they “are doing good things growing food” that the planning rules should not apply to them.
2. People passing themselves off as horticultural growers to gain permission to build a dwelling in a rural location, but without the intention to run a long-term business. Having secured planning permission, they might then sell the property on at a profit with no land-based business attached to it.
3. People with every good intention of running a long-term horticultural enterprise who are successful in securing permission for structures or a dwelling, but then personal or commercial circumstances might change, which could lead to the business folding. This would leave structures in the open countryside to which a land-based business was no longer attached.
4. Most of the interviewees used the term “hobby farmers” and expressed concern that reducing the 5 hectare threshold for permitted development rights would allow people they deemed to be in this category to extend their gardens beyond the curtilage of their property into agricultural land, diminishing supply of high grade land for agriculture. The inference was that horticulture concerns are not viewed as serious business enterprises.

Time and Cost

Some of the key points raised by growers were put to the planning officials – particularly time and costs involved in making an application.

Time to Process Applications

Planning officials interviewed felt that the lengthy time which many growers have experienced could be due to a number of factors, including:

1. *The low quality of applications and ill-preparedness of applicants* – this means that Planning Officers have to request amended and additional information, adding time to the process.

2. *Extreme pressure on planning departments resources.*

As outlined in “The Big Conversation”¹¹ (researched for Welsh Government and published in January 2023), the RTPI (Royal Town Planning Institute - the professional body representing planners in the United Kingdom) – most authorities have had significant budget cuts in the past decade, have smaller teams of Planning Officers, are struggling to fill vacancies and retain staff whilst simultaneously having had their remit and therefore caseload increased.

Regulations regarding phosphates and policies regarding second homes were cited as recent major issues impacting heavily on resources for those authorities to whom they apply. (See Appendix Figures 14 and 15).

In particular, the ongoing burden on resources for the annual monitoring required for any One Planet Developments approved was highlighted by several planning authorities.

3. *The complexity of investigations associated with applications in the countryside.* This include the need for various reports and surveys and involvement of other statutory bodies – such as Highways, NRW, Welsh Water, who themselves are suffering from a lack of personnel and high workloads.
4. *Diverse purposes.* One of the positive aspects that advocates of small-scale horticulture have put forward is that these enterprises can offer social value, beyond purely positive economic benefits. These might extend to engaging with local communities and providing activities to promote social inclusion and tackle loneliness, enhance people’s mental health and physical well-being and provide access to fresh, nutrient dense food.

However, planning officials interviewed pointed out that, whilst all of these endeavours are desirable and laudable, actually this diversity of purpose may add to the structures or hard standing for car parking for which planning permission is sought.

From the Planning Officers perspective, this can in turn add considerable complexity to the assessment process and how they should apply the tests inherent in the decision-making process. This is one area where it was felt that the scope for differing interpretations of the regulations between, or even within, an authority might occur.

Regarding the performance of Planning Authorities in time taken to reach planning decisions we were referred to the data collated by Welsh Government. Below is a graph extracted from *Welsh Government Development Management*

¹¹ Royal Town Planning Institute: [The Big Conversation](#) (January 2023)

*Quarterly Surveys*¹² which illustrates the variations in time taken by authority as an average of the period Q4 2021/22 to Q4 2022/23.

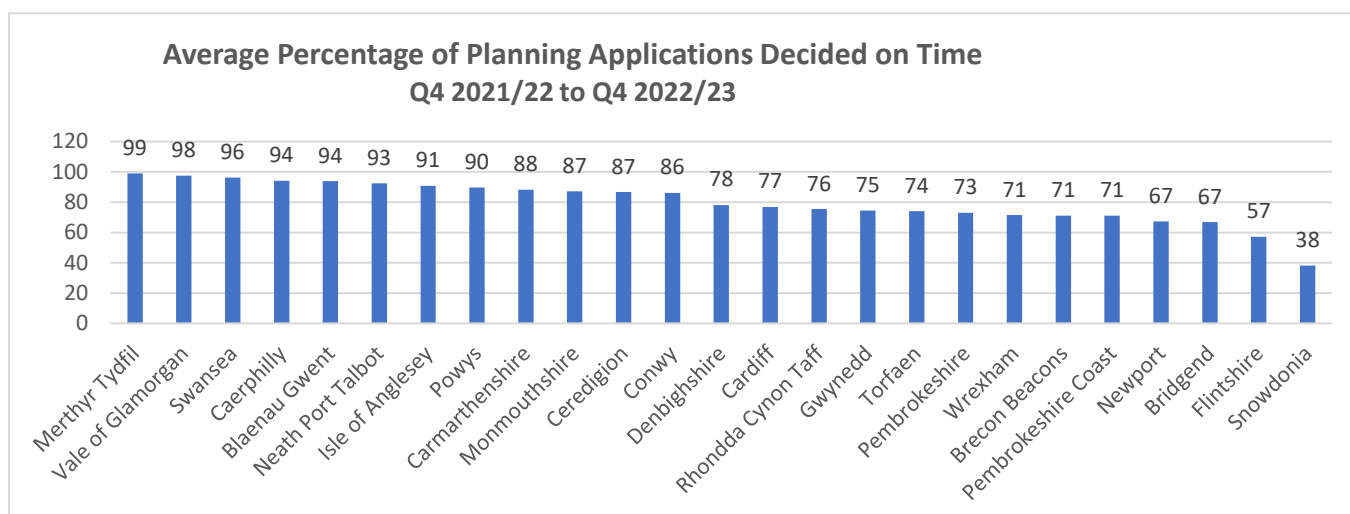


Figure 12 Percentage of Planning Applications Decided on Time By Planning Authority

However, as previously outlined, the online Grower Survey indicated that very few growers are receiving their planning decisions anything like “on time”.

Cost of Applications

Several planning officials interviewed pointed out that current Planning Applications Fees for the erection of building on agricultural land for agricultural purposes were pitched lower than for other applicants, such as householders, as part of the supportive measures for the sector.

They noted that such fees do not realistically cover the costs of assessing and processing such applications. As mentioned above, One Planet Developments were particularly highlighted as presenting a significant cost in resources needed for annual monitoring.

A full list of fees is available on various Local Authority websites such as the Pembrokeshire County Council website¹³.

Planning authorities who had some experience of assessing horticultural applicants did acknowledge that providing supporting reports, surveys and evidence to support applications could be the main costs that applicants would face, and these might run into several hundred or even thousands of pounds for certain applications.

¹² Welsh Government: [Development Management Quarterly Surveys](#)

¹³ Pembrokeshire County Council: [A Guide to the Fees for Planning Applications in Wales](#)

Functional Need for Dwellings

The subject over which the views of growers and planning authorities diverged most significantly was regarding dwellings being needed on-site at commercial horticultural enterprises.

Many growers feel there is a strong case for them to live on site in order to effectively run their businesses. They feel discriminated against compared to other types of farming, for example where the need to tend livestock is accepted as proving the functional need for a dwelling on the farm. They cite the intensive nature of tending to horticultural crops, which need ongoing labour inputs to thrive.

Input to the survey from one grower was typical of many such views regarding the functional need.

“It is more than a full-time job running a horticultural business with demands on your time all around the clock and the requirement to deal with emergency situations e.g. livestock getting onto site from neighbouring farms which could decimate crops or responding to weather conditions e.g. frosts, thunderstorms and extreme heat.

Living on site like with any other type of farm is a requirement to run a successful viable business.”

This point has been extensively explored by the “Planning Issues for Smaller Horticulture-Based Farms Seeking On-Site Dwellings - Bannau Brycheiniog National Park, Monmouthshire & Powys” report¹⁴ prepared by planning professional James Shorten for the community benefit society, Our Food 1200¹⁵.

The report outlines many of the key issues horticultural enterprises are encountering regarding meeting the functional and financial tests for a dwelling, and there is a project underway in Q4 2023 and Q1 2024 to explore and evidence the needs, aiming to create supplementary planning guidance to support new viable horticultural farming business models. The aim is to create a best practice document for a wider cohort of planning authorities.

As well as the functional need test, financial tests also pose issues for small scale horticulture due to suspicion from planning authorities that such small areas of land can support successful businesses with long-term viability.

Growing organisations are keen to point out that a site of 3 acres can generate a turnover equal to or well over that likely to be made by “traditional” livestock farms -

¹⁴ Planning Issues for Smaller Horticulture-Based Farms Seeking On-Site Dwellings - Bannau Brycheiniog National Park, Monmouthshire & Powys Report [available here](#).

¹⁵ [Our Food 1200](#)

£36,800 for Cattle & sheep LFA (Less Favoured Areas) farms and £26,500 for Cattle & sheep (lowland) farms¹⁶.

However, for the planning authorities interviewed mention of housing led to “alarm bells”. They posed questions or comments such as:

“Are we going to see a proliferation of accommodation?

Do they really need to live on the site 24 hours a day, 7 days a week? This is where we have had issues. With animal welfare, we can see farms have a functional need.

There is already allowance for temporary accommodation for a season. Growers can move a caravan on site then move caravan away. Because a caravan is a structure for human habitation, can be used for residential use. The 1960 Caravan Sites and Control of Development Act has a schedule (Part 5) which has 10 circumstances under which this is allowed. One of these is in connection with agricultural worker for a particular season”

“Why can’t growers use modern technology such as sensors and CCTV to alert them to on farm emergencies and then go to the site to sort things out?”

However, growing organisations and growers highlight the expense of such technology, especially given the low profit margins that such enterprises generate.

They also point out that living permanently on site not only makes running a small-scale horticultural business viable, due to reduced living costs, but also creates an environment in which family life can be conducted in a manner conducive to long-term sustainability. Living in temporary caravans does not make for settled existence and ignores the basic human desire for an affordable, decent quality and stable home in which to raise a family.

When this was put to the planning authorities, they pointed out that current planning policy and regulations only permits them to “consider the needs of the land holding, not the family needs of applicants”.

¹⁶ Statistics for Wales: Farm incomes in Wales 2021-22

Growers noted that granting permission to live on their horticultural holdings was possibly one of the most financially low-cost yet effective interventions that Welsh Government could give to the sector.

With regard to whether the research revealed any strong variations between planning authorities in how they approach horticulture sector planning applications, the small number of applications across the country has already been noted and means that there is not statistically significant and robust evidence to prove or disprove a bias.

However, from the interviews conducted there were anecdotal references made by both growers and planning officials that, whilst working within the legal parameters set out by planning legislation, individual officers are making decisions based upon their own professional judgement and experience. In this respect horticultural applications are not unique – this applies to all applications. Several planning officials stated that officers are doing their best in the face of the previously outlined pressures that they are under.

Recommendations and Opportunities

This section highlights recommendations and actions that could be taken to help address and overcome the barriers to small scale horticulture development in Wales. Section 4 of the research specification highlighted five specific actions to be researched and addressed:

- To amend the [Town and Country \(General Permitted Development\) Order 1995](#) to set a lower hectare limit for solely horticultural enterprises.
- To suggest opportunities for the revision of [Planning Policy Wales](#) to put emphasis on the Welsh Government policy goal to increase small scale horticulture in Wales.
- To undertake other activities to raise awareness / educate planning authorities about the Welsh Government's policy to promote horticulture, including increasing understanding of its characteristics and needs.
- To provide financial support for the planning fee and/or associated survey and report and professional fee costs which new and/or existing small scale horticulture enterprises face.
- To provide an advisory support service for applicants (the aim being to supplant the need to hire a professional adviser and the cost that entails).

Approach to Change

During the interviews with planning professionals, the view was expressed that “the planning system will do whatever it is asked to do” and this is laid out in the various pieces of legislation, technical advice and planning guidance in place at the moment.

Should Welsh Government wish to change the parameters under which Planning Officers should evaluate horticultural planning applications, many of the planning officials observed that this is, of course, their prerogative.

Indeed, some noted that if “as a nation we want different outcomes”, then we may well need to take new and different approaches to agriculture and reflect these in planning policy and regulations.

Therefore, if Wales wants to increase its output of vegetables, fruit, nuts, vines, herbs and other horticultural products then this may require a review of priorities within this countryside environment. For example, where does the desire to retain pleasing views rank against the need for polytunnels to increase the quantity, reliability, yields, growing seasons and diversity of crops? How can we best achieve this desired increase in production whilst protecting biodiversity and fragile ecosystems?

If a change in food production systems is desired, what changes in planning policy and regulations are acceptable to achieve this?

It was strongly requested by the planning authorities interviewed, therefore, that any change to planning systems should:

1. Be subject to careful consideration of the **objectives** of any change.
2. Provide **clear definitions** of the **types and characteristics** of horticultural activities which would be subject to any changes.

3. Clearly state **priorities regarding competing uses of land** – especially that graded 1 to 3a - the “best and most versatile land”¹⁷ – for example where would priorities lie between horticultural use vs solar farms?
4. Be expressed in **enabling language** which allows Planning Officers to find in favour of horticultural planning applications.
5. Be **nationally applied** and not left to individual planning authorities to try to assess or interpret, as this increases the scope for inconsistency.
6. Be reflected in the **National or Strategic Development Plans** as the cascade principles within this system would then filter down to the Local Development Plans.
7. Be extremely mindful of creating **unintended negative consequences** – be this for the landscape and environment, the horticultural sector, or the planning departments.

Potential Welsh Government Interventions

Certain potential measures that Welsh Government might consider were suggested both by grower advocacy groups and planning officials as opportunities or vehicles through which a more positive approach to the horticulture sector could be created.

These suggestions have been grouped into three main categories and included in the online Grower Survey. Tables which outline the extent of support for suggested interventions by previous and potential planning applicants in the horticultural sector can be found in the Appendix.

Potential Actions and Next Steps

Specific actions for which recommendations were requested were noted in Section 4 of the research brief.



















Following the research work undertaken, it is recommended that:

- a phased approach is taken to the actions outlined below
- that the initial focus is on setting out Welsh Government’s vision and objectives, creating enabling language, 1:1 support and training and raising awareness
- that the effectiveness of these initial actions are reviewed before consideration is given to further actions.

The actions are addressed below in the order listed in the brief. Comments relating to the phased approach are also included.

The table below summarises the recommendations and actions in a phased approach

¹⁷ Welsh Government : [Agricultural land classification](#)

Recommendation & sub-actions	Phase 1	Phase 2	Phase 3
To amend the Town & Country (General Permitted Development) Order 1995 to set a lower hectare limit for solely horticultural enterprises			
Review the 5-hectare threshold for permitted development rights to better accommodate the Welsh horticulture sector			
To suggest opportunities for the revision of Planning Policy Wales to put emphasis on the Welsh Government policy goal to increase small scale horticulture in Wales			
Inclusion of enabling language which articulates policy goals into Development Plans & planning updates, starting with Planning Policy Wales			
Make explicit mention of horticulture in Planning Policy Wales			
Update supplementary planning guidance to give better support to the expansion ambitions of the horticulture sector			
Update Technical Advice Note 6 to better support the policy objectives articulated in the sector vision and objectives			
Review of the planning criteria & ongoing monitoring conditions for One Planet Developments			
Engage with Our Food 1200 project in Bannau Brycheiniog regarding their intended supplementary planning guidance and wider application in other authorities			
To undertake other activities to raise awareness / educate planning authorities about the Welsh Government's policy to promote horticulture, including increasing understanding of its characteristics and needs			
Set out a vision for the horticulture sector, along with objectives (update the Action Plan for the Commercial Horticulture Industry in Wales, published in 2020)			
Fund or work with grower groups/stakeholders to create a publicity campaign to raise awareness about the sector amongst planning officials and local and park planning authorities			
To provide financial support for the planning fee and/or associated survey and report and professional fee costs which new and/or existing small scale horticulture enterprises face			
Pilot a funded programme to support with survey &/or report costs, using the International Trade Development Programme or Overseas Business Development Visit Grant as a model			
To provide an advisory support service for applicants (the aim being to supplant the need to hire a professional adviser and the cost that entails)			
Provide online group training for preparing & submitting planning applications or pre-recorded video training			
Develop CPD accredited Planning Officer training (endorsed by the Royal Town Planning Institute)			
Create awareness raising briefings for planning committees			

Point 1: To amend the Town and Country (General Permitted Development) Order 1995 to set a lower hectare limit for solely horticultural enterprises.

1. The research supports the review of the 5-hectare threshold for permitted development rights to better accommodate the Welsh horticultural sector. This is based upon the economic viability demonstrated by enterprises farming land of less than 5 hectares.

It is recognised that a change in legislation is likely to be an onerous process, so whilst the implementation of this is expected in phase 3, it is recommended that steps are taken to address how this change could be made in earlier phases and alongside less onerous recommendations, whose impact can be assessed before moving to legislative change regarding the 5-hectare threshold.

Point 2: To suggest opportunities for the revision of Planning Policy Wales to put emphasis on the Welsh Government policy goal to increase small scale horticulture in Wales.

1. Stakeholders – both growers and planning authorities were strongly in favour of Welsh Government creating **enabling language** which articulates the policy goals for horticulture and for this to be inserted into Development Plans and planning updates. The enabling language could start at the highest level with Planning Policy Wales. Local Planning Authorities could then reference this in their Local Development Plans on the established principle that LDPs should be in general conformity with the adopted plan(s) in the tier or tiers above it. Phase 1.
2. Using the enabling language, definitions, vision and objectives developed for the sector, making explicit mention of Horticulture in Planning Policy Wales is recommended to act as an enabling measure for policy at a local level. Phase 1.
3. The research also supports the updating of supplementary planning guidance to give better support to the ambitions for expansion of the horticultural sector in Wales as set out in the vision and objectives. Phase 2.
4. TAN6 (Technical Advice Note 6) was widely acknowledged by both growers and planning authorities to be out of date and not reflecting contemporary ambitions to expand the horticultural sector in Wales. It is recommended that Welsh Government update TAN6 to better support the policy objectives which would be articulated in the vision and objectives created by implementing the recommendations. Phase 3.
5. The research supports the review of the planning criteria and ongoing monitoring conditions for OPDs. Based on the feedback and evaluation of the scheme by previously successful and current applicants and planning authorities, there is now a sufficiently established body of evidence upon which to make informed decisions for reform and improvement. An extensive Review of One Planet Development in Wales 2010-2021¹⁸ was prepared by the One Planet Council and launched at the Senedd in September 2022. This outlines recommendations regarding planning based on the lived experience of OPD practitioners. Phase 2.
6. The research team recommend that Welsh Government engage with the Our Food 1200 project in Bannau Brycheiniog to understand how their project and intended **supplementary planning guidance** might have wider usage in other authorities which would be beneficial to the growth of the horticultural sector in Wales. Phase 1.

Point 3: To undertake other activities to raise awareness / educate planning authorities about the Welsh Government's policy to promote horticulture, including increasing understanding of its characteristics and needs.

¹⁸ One Planet Council : [Review of One Planet Development in Wales 2010-2021](#)

The following steps are recommended following the stakeholder engagement undertaken in the course of the research :

1. Set out the **vision** for the Horticulture sector – what type and size of growing enterprises or initiatives do Welsh Government want to encourage, where, in what numbers or proximities, over what timescales, with what on-site structures, producing what crops, with what requirement for permanent or temporary onsite dwellings? Phase 1.
2. Aligned to the development of a vision, define the sector **objectives** for Horticulture – such as food output tonnage, boosting food tourism, growing local food economies, community growing initiatives and creating or augmenting supply chain networks at a local or national scale. Given the close link between horticulture and community food or community growing, the vision and objectives should align with the development of the Community Food Strategy. Phase 1.
3. Fund and work with the grower groups to create a **publicity campaign** to raise awareness of the sector amongst WG departments and other public sector organisations including planning, the local and park authorities, the “traditional” farming sector and its representative groups and the general public. The objective would be to explain the many benefits of the sector and win over hearts and minds to support its growth. Several of the local planning authorities referred to the need for a change in mindset. The Horticulture Cluster and the Horticulture element of Farming Connect could be the channel through which to deliver these activities. Phase 2
4. There are already strategies and plans in place or under development which could be reviewed and updated, if necessary, to assist with this process for example the *Action Plan for the Commercial Horticulture Industry in Wales*¹⁹ published in 2020. Phase 2

Point 4: To provide financial support for the planning fee and/or associated survey and report and professional fee costs which new and/or existing small scale horticulture enterprises face.

1. Regarding funding for horticultural planning applicants, the research results in a recommendation to fund specific **121 support** for those applicants who meet the scope of the objectives defined by the previous actions, outlined in Point 3. The support might reveal that an application needs significant change to have the likelihood of succeeding, so the applicant would also need to be supported through this process.

Access to this support would need to be as **non-bureaucratic** as possible, otherwise it risks just becoming another barrier!

A model for the types of grants or support that could be offered to assist growers with their planning applications could be the International Trade Development (ITD) and/or Overseas Business Development Visit (OBDV) grants.

¹⁹ Tyfu Cymru : [Commercial Horticulture Plan 2020](#)

The ITD is capped at £5,000 and can be used by businesses to develop their export strategy, research target markets, etc. Welsh Government has procured a group of contractors who receive referrals on a taxi rank basis to businesses requiring support. Businesses apply via a simple application form, and Welsh Government pays the contractor directly once the project is complete, so there is no cashflow issue for the business. This type of grant would be suitable to help a prospective applicant prepare for their application and, with suitably qualified contractors, may help to improve the quality of applications and timeliness of outcomes (approvals).

The OBDV is also accessed by a straightforward application process and provides the business with up to 50% of costs relating to traveling to a new export market, including costs relating to exhibiting at a trade show (such as stand build costs). However, the business must apply before any financial commitments are made; only once the application is approved can the business proceed with booking travel, accommodation, stand build instructions, etc. Furthermore, the business claims in arrears and only when evidence of defrayment is submitted (invoices, receipts, evidence of payments made from bank accounts). Therefore, this grant can lead to cashflow issues if there is a delay in the grant being paid to the business.

This OBDV approach could be suitable for part-funding professional fees for reports which may need to accompany planning applications or may be requested through the process. However, this could also be a disadvantage of the scheme as the applicant generally does not know how much these costs are likely to be from the outset, so they may apply for 50% of an estimated amount which is significantly under-valued.

The management of these types of grants could be procured through the most relevant Lot in the Food Sector Development Framework or discussions could be held with LANTRA as the delivery partner for the Horticulture Lot within Farming Connect and the Horticulture Cluster to explore whether this type of grant management would be in scope for either contract.

Given the low numbers of horticulture planning applications, we would recommend that an annual budget for either or both these options is capped and is available on the basis of the quality of applications, with applicants from horticulture enterprises which are under the 5-hectare threshold being the key eligibility criteria.

We estimate that a total budget of £50,000, and an individual budget of £2,000 to £2,500 per applicant would be sufficient. A smaller budget could initially be allocated as a pilot to test the success of such an approach. Phase 2

Point 5: To provide an advisory support service for applicants (the aim being to supplant the need to hire a professional adviser and the cost that entails).

The following actions are recommended based on the research, interviews and growers survey. These actions could be developed by Welsh Government with current delivery partners such as LANTRA or established grower organisations

such as Social Farms and Gardens, the One Planet Development Council and the Landworkers Alliance.

1. **Online group training** for growers considering planning applications was a popular option amongst the growers surveyed, although given the low numbers of applicants, co-ordinating groups of applicants and determining when this type of training should run might present challenges. Phase 2
2. **Pre-recorded video training** might be a useful and accessible way to provide an introduction to the planning application process, offer advice and demonstrate how to create a compelling application and cover frequently asked questions, particularly if this could be offered alongside a follow-up 121 support mechanism. These 2 training routes could be delivered by additional funding to the Horticulture Cluster or the Farming Connect Horticulture programme. Phase 2
3. Based on feedback from Planning Authorities , we also recommend funding to develop **CPD Accredited Planning Officer Training** and for this to be endorsed by the **RTPI**. The Royal Town Planning Institute is the professional body representing planners in the United Kingdom and Ireland. All Planning professionals are obliged to undertake 50 hours of accredited CPD over a 2 year period, and senior planning officials noted that CPD accreditation would be a real motivation for planners to participate. Phase 2
4. Create an **awareness raising briefing** for Planning Committees from these training materials. Whilst local planning authorities saw this as a lesser priority for a number of reasons, including the low number of applications received and the delegated powers in place which means that many applications do not go before the Planning Committees, this measure was very much supported by participants in the online Grower Survey. The lack of awareness by Planning Committees was particularly highlighted by One Planet Development growers and it may well be that these more complex applications do tend to go before the Planning Committees. Phase 2

Sector Specific Requests for Welsh Government Action

Welsh Wine Sector

Growers interviewed from the vineyard sector of horticulture referenced the Welsh Wine Industry Strategy published in December 2022²⁰, in which planning permission barriers regarding the construction of wineries and cellarage were highlighted as holding back growth and disadvantaging the Welsh wine industry.

This, along with planning issues are preventing the sector achieving the economic benefits and employment opportunities which could accrue from Wine Tourism.

Stakeholders requested that the issues raised be addressed urgently to avoid the Welsh Wine Industry falling further behind competitors. Phase 1

²⁰ Business Wales : [Sparkling future for Welsh wine following strategy launch](#)

Community Food Groups

The intended Community Food Strategy could also be cross-referenced to ensure positive outcomes to any future actions.

Stakeholder engagement revealed one specific planning-related request from the community growing sector was to update the extremely welcome and enabling permitted development rights granted to allotment holders to construct a shed and/or greenhouse (depending on plot size).

As Community Growing has evolved, many Community Sites now want “a single larger shed or polytunnel instead of multiple little ones, so they can work together and have less visual impact”.

Setting Intervention Priorities

As outlined above, we would recommend a phased approach with the following phases:

Phase 1

Set out the Welsh Government vision and objectives for the horticultural sector.

Create enabling language for planning purposes which articulates the policy goals. This enabling language could start at the highest level with Planning Policy Wales. Local Planning Authorities could then reference this in their Local Development Plans on the established principle that LDPs should be in general conformity with the adopted plan(s) in the tier or tiers above it

Engage with the Bannau Brycheiniog National Park Planning Authority where an initiative is underway in terms of possible updates to supplementary planning guidance to foster improved opportunities for small scale growers. Their progress could be reviewed to determine if this model might be helpful in other local authority areas.

Updating SPG was viewed by the Planning Officers interviewed as the most rapid way in which to create change regarding horticultural applications and could be used as a vehicle to further objectives to grow the sector. As outlined in the main report, the interconnectivity of any SPG changes with the LDPs (Local Development Plans) is noted as a pre-requisite to change.

Phase 2

Update of supplementary planning guidance to give better support to the ambitions for expansion of the horticultural sector in Wales as set out in the vision and objectives.

Fund specific **121 support** for planning applicants who meet the scope of the objectives defined by the previous actions. A pilot scheme offering financial support for the planning fee and/or associated costs for surveys, report and professional services fees could be trialled and reviewed for effectiveness in furthering the objectives defined

Provide funding to create and deliver:

- training for growers considering planning applications
- CPD accredited training for Planning Officers

Fund and work with the grower groups to create a publicity campaign to raise awareness of the sector. This should incorporate communication strands directed to the different parties who would benefit from improved understanding of the sector and its desired future direction. This would include Welsh Government departments, local authorities including Planning Officers and Committees, land-based organisations who could assist with fostering the growth of the sector, the wider agricultural community and the general public within Wales.

Review and update the planning criteria and ongoing monitoring conditions for OPDs, if this remains part of the Welsh Government vision moving forward, as failure to do so will inhibit its future sustainability.

Phase 3

Having delivered the above initiatives, we suggest that the situation is then reviewed to reveal what shortcomings remain unresolved.

If the previous initiatives had not improved the success rate and ease of gaining planning permission under the current specified conditions, then consideration of revising the 5 hectare threshold for permitted development rights might be required.

Actions such as inserting the Welsh horticultural agenda into Development Plans and updating TAN6 may be required to achieve wider benefits to the horticultural sector. Whilst, these actions may be longer term, they would benefit from being initiated and put in motion as soon as possible.

Acknowledgements

Support for the Research

The research team would like to thank all the individual growers and grower groups and associations who have supported the research through interviews, insight and distributing and responding to the online Grower Survey.

This has allowed meaningful engagement with stakeholders in the Horticultural Sector across Wales.

In addition, we have greatly appreciated the time and insight provided by the planning authorities who participated in interviews.

Infographic Templates: Adapted from Slidesgo

Icons: Flaticon

Planning Authorities Engagement

Interviews Conducted

Parc Cenedlaethol Bannau Brycheiniog
Caerphilly
Ceredigion
Pembrokeshire
Powys
Swansea
Torfaen
Vale of Glamorgan
Wrexham

Responded by E-Mail but could not participate due to resource constraints

Conway
Denbighshire

Responded by E-Mail but not available for interview in the time frame

Pembrokeshire Coastal Park

Responded by E-Mail but unable to comment due to no Horticultural planning applications

Parc Cenedlaethol Eryri

Support Levels for Welsh Government Led Interventions

The tables below outline the level of support expressed in the online Grower Survey by horticultural applicants who have previously applied for planning permission, or who are considering applying.

Planning Policy Review

Possible Changes	Level of Support from Previous Planning Applicants	Level of Support from Potential Planning Applicants	Comments
<i>Removal of the 5-hectare threshold as a differentiator for permitted development rights or requiring planning permission</i>	55%	88.9%	<i>Planning officials and some growers noted that the dimensions/ scale of permitted development rights should be related to the area of land on which structures would be erected</i>
<i>Greater use of Temporary Planning Permission for horticultural sites to allow time to prove the viability of the business</i>	65%	55.6%	<i>Growers noted that it can potentially take 5 to 7 years for a business to be viable depending on types of crops cultivated – such as orchards and vines</i>
<i>Allowing planning authorities to grant planning permission for dwellings on horticultural sites more readily, but combined with stronger conditions to ensure that the site remains in production within a land-based business</i>	70%	77.8%	<i>Planning officials were extremely concerned that permission for dwellings remained tied to genuine land-based businesses</i>
<i>A Welsh Government campaign promoting how small-scale horticultural enterprises can support food security, biodiversity, rural economies and tourism, land-based education and well-being objectives</i>	65%	100%	<i>A positive positioning of the sector to the general public, “traditional” farming sector and planning authorities was seen as an important lever in growing horticulture in Wales</i>

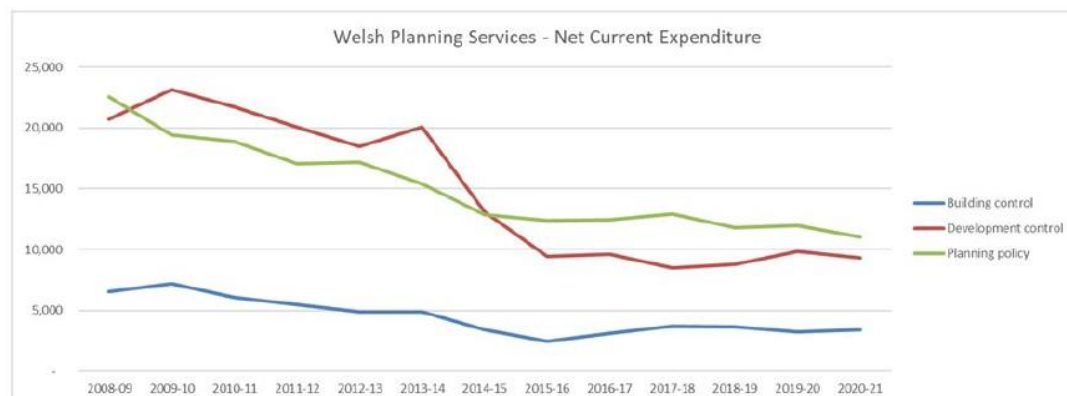
Planning System Updates

Possible Changes	Level of Support from Previous Planning Applicants	Level of Support from Potential Planning Applicants	Comments
Updating Technical Advice Note (TAN) 6: "Planning for sustainable rural communities" to put emphasis on the Welsh Government's policy goal to increase small-scale horticulture in Wales	65%	88.9%	TAN6 was noted by both grower and planning team interviews to be "elderly" legislation – pre-dating the Well-Being of Future Generations Act, market shifts post-Brexit and contemporary thinking on climate change & food security
Updating Supplementary Planning Guidance which promotes greater consistency across local planning authorities considering planning permission for onsite infrastructure buildings for horticultural enterprises	85%	88.9%	Updates were advocated by growers, and planning officials were not averse to this, subject to careful consideration of the 7 points noted in the Approach to Change section above.
An updated Supplementary Planning Guidance which promotes greater consistency across local planning authorities considering planning permission for residential dwellings for staff working on horticultural enterprises	80%	66.7%	See comment above.
Quicker decision making for planning applications and appeals for horticultural businesses	75%	66.7%	Time taken to reach planning decisions was a key point raised by both previous and potential applicants.
Ensuring that the Welsh Government's goal to increase small-scale horticulture in Wales is explicitly expressed in the National, Strategic and Local Development Plans	70%	77.8%	Articulating the policy goal in planning strategy and providing enabling language would allow planning officials to adopt a more supportive approach to horticultural applications.

Training and Awareness-raising Related Support Initiatives

Possible Changes	Level of Support from Previous Planning Applicants	Level of Support from Potential Planning Applicants	Comments
<i>Free one to one support for individual growers to assist them in applying for planning permission</i>	80%	100%	<i>Free support from an approachable, knowledgeable person would be the most highly valued of the 3 options.</i>
<i>Free online group training / information sessions for growers to assist them when applying for planning permission</i>	70%	55.6%	<i>Online training for groups of growers was a more popular option than in-person training.</i>
<i>Free regional, in-person group training / information session for growers to assist them when applying for planning permission</i>	55%	55.6%	<i>Just over half of respondents would value this option.</i>
<i>A list of specialist service providers and consultants who are experienced in horticultural planning applications</i>	60%	44.4%	<i>Only some respondents had encountered difficulties locating service providers, which may be reflected in these lower preference scores.</i>
<i>Training about the horticultural sector being provided to Planning Officers in Local and National Park Authorities</i>	85%	77.8%	<i>Training for Planning Officers was strongly supported by growers. Planning officials interviewed suggested this should be available for authorities who receive horticultural applications and should be CPD accredited with the RTPI.</i>
<i>Training about the horticultural sector being provided to Planning Committees in Local and National Park Authorities</i>	85%	77.8%	<i>Growers strongly advocated this approach, whereas planning officials felt that if planning permissions were more able to be approved by enabling policies, less applications would pass to committees for decisions.</i>
<i>Training about the horticultural sector being provided to finance providers</i>	35%	33.3%	<i>This option was felt to be less important, but could be part of any awareness raising campaign.</i>

Analysis by Audit Wales² shows that “all planning services – policy, development and building control – have, since 2008-09, seen significant cuts in expenditure with budgets having fallen by 50% in real terms, considering inflation. Net expenditure has fallen from £45 million in 2008-09 to £22.8 million in 2017-18. The biggest cut has been to development control budgets where spend has reduced by 59%.”



Senedd Cymru / Welsh Parliament's Public Accounts Committee published its report into The Effectiveness of Local Planning Authorities in Wales³ in June 2020. The report stated:

“Our overall conclusion is that Planning is critical but at present it is not able to deliver the aspirations of the Planning, Environment and Well-being of Future Generations Acts because of reductions in resources.”

Figure 14 Extract from The Big Conversation report from RTPI (P8)

Water based topics	Natural Environment topics
<ul style="list-style-type: none"> SABs and SuDS, in particular SAB process issues. Some referred to “<i>excruciatingly difficult to progress in line with planning timescales.</i>” Phosphates and nutrient neutrality; Uncertainty around TAN15 and placemaking; Green infrastructure 	<ul style="list-style-type: none"> Ecology – There appears to be capacity issues in relation to ecology. “<i>We haven't managed to employ an Ecology Officer for months.</i>” Trees – planting, aftercare and on-going maintenance; Landscape specialists, visual impact, and cultural heritage, Loss of best and most versatile land
Broader topics	
<ul style="list-style-type: none"> Viability Impact assessment (equality, Welsh Language Assessments); Minerals; Quality of design skills – “<i>generally poor on applications</i>” Renewables; 	<ul style="list-style-type: none"> Net zero; Transport and highways – still very much focused on car-based solutions; Conservation heritage; One planet development; Understanding infrastructure and service capacity.

Figure 13 Extract from The Big Conversation report from RTPI (P20)