YES IN MY FARM YARD: HOW PERMITTED DEVELOPMENT CAN SAVE RURAL BRITAIN







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About the YIMBY Initiative

The YIMBY Initiative is a research centre and stakeholder management partner dedicated to creating a UK with abundant housing, clean energy, and modern infrastructure.

We advocate for bold reforms that accelerate development, lower costs, and improve quality of life for all.

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Executive Summary of the Literature Review

The year 2024 saw a landmark expansion of agricultural Permitted Development Rights (PDR) in England, aimed at unlocking significant economic value in the rural sector while maintaining planning safeguards. PDRs allow certain agricultural building changes, such as barn conversions or new farm structures, to proceed without full planning permission, under nationally set limits. In May 2024, the government implemented reforms enabling farmers to convert more agricultural buildings into homes and businesses, and to construct larger farm buildings, without a planning application (edgarslimited. co.uk). For instance, the cap on barn conversions to dwellings was doubled from 5 to 10 units per farm, and the size limit for new agricultural buildings was increased from 1,000 m² to 1,500 m² (edgarslimited.co.uk, newforestnpa.gov.uk).

These changes respond to long-standing calls from the farming industry to cut red tape and foster rural enterprise. Industry stakeholders project that closing the rural productivity gap through such diversification could add over £40 billion to UK gross value added (cla.org. uk). The expanded PDR regime is expected to facilitate

farm diversification into ventures like farm shops, tourism, and on-farm processing, as well as deliver much-needed rural housing, thereby boosting local jobs and services. Importantly, key environmental and planning safeguards remain in place: prior approval by local authorities is still required for factors like highway access and design, and protected landscapes (National Parks and Areas of Outstanding Natural Beauty) continue to be exempt from these developments (edgarslimited.co.uk). The 2024 reforms have thus been broadly welcomed as a potential rural growth engine, though they also spark debate - with farming groups celebrating new opportunities and conservation groups cautioning about landscape and community impacts. This review examines the updated agricultural PDR framework, its economic potential, environmental considerations, and the ongoing policy debate surrounding its implementation (edgarslimited.co.uk, cpresussex.org.uk).



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Mike ReaderMP for Northampton South

In the conversations I have with farmers across
Northamptonshire and beyond, one message comes
through loud and clear, they want to do more. More
to grow, to adapt, to diversify, and to help meet the
challenges facing our economy, our environment and
our communities. But far too often, our planning system
holds them back.

This paper sets out a compelling case for change.

By reforming permitted development rights (PDRs) for agricultural buildings, we can unlock new opportunities for rural growth, from providing homes for local workers to supporting food production and clean energy. We must back our farmers with the tools they need to invest, innovate and contribute to the future of Britain's rural economy.

Crucially, this can be done without compromising on environmental protection. Farmers tell me they are ready to comply with habitat and building regulations, what they need is a planning system that is more enabling, not more complicated. The current restrictions on Class Q and Class R too often stifle sensible proposals that would deliver tangible public benefit.

Expanding PDRs, particularly to support on-farm processing and anaerobic digestion, is also a vital step toward strengthening our energy resilience and reducing our reliance on imported fertilisers from unstable, hostile regimes such as Russia. In doing so, we will help meet our net zero goals, boost local productivity and create new green jobs.

This is a serious, thoughtful paper. It offers policy-makers a practical route to support our rural communities, not by dismantling safeguards, but by making the system work better. It is pro-growth, pro-environment, and prorural Britain. I welcome its ambition and its focus.

We have a real opportunity to build a planning system that works for rural Britain. Let's get on with it.



Sarah Dyke MP for Glastonbury and Somerton

As a member of a farming family, and as the Member of Parliament for Glastonbury and Somerton - a constituency made up of some of England's most beautiful yet economically challenged rural communities - I know all too well the bureaucratic obstacles that have long stifled innovation and growth on our farms.

The countryside is brimming with opportunity, but for too long, planning policy has operated as though rural areas are frozen in time, instead we must balance preserving heritage while empowering communities. Farmers have faced hurdles when attempting to convert unused barns into homes for workers, or set up farm shops and small businesses on their land. These limitations have helped drive a crisis in affordable rural housing, limited agricultural diversification, and held back the kind of sustainable, nature–friendly growth that Liberal Democrats have long championed.

This paper sets out the case for modernising agricultural Permitted Development Rights (PDR) enabling farmers to do what they do best: adapt, innovate and thrive. Whilst I will not endorse every recommendation in the paper, the current system leaves many landowners entangled in unnecessary red tape. Whether it's stopping the conversion of disused buildings into accommodation for key workers, or enabling more digestate storage as part

of a circular and sustainable farming model, the status quo is simply no longer fit for purpose.

The Liberal Democrats believe in an ambitious future for British agriculture, one that recognises the dual role our farmers play as both food producers and stewards of the natural world. Reforming PDR is not about deregulation; it is about creating smart, sensible, evidence-based rules that work for our farmers and agricultural workers.

It's about giving our communities the tools to diversify, invest and build resilience, and to contribute to our net zero future.

If we are to close the rural productivity gap, which Britain has trailed behind over the last decade, secure the future of British farming, and restore vibrancy to our market towns and villages, then a planning system that listens to rural voices, rather than imposing urban assumptions, is vital.

This report speaks with clarity and urgency. It reflects what I hear from constituents and fellow farmers. I urge all parties to read it with the seriousness our rural future deserves.

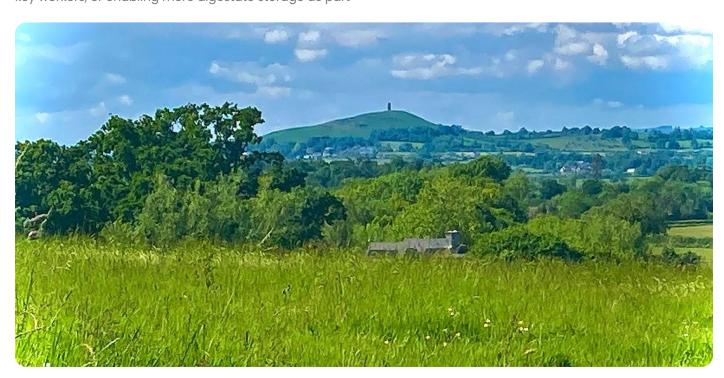


Image: Sarah Dyke MP

Overview of Agricutural Permitted Development Rights in England

Legislative Background and Evolution

England's planning system has long included special provisions for agriculture, recognising that farmers often need to develop their land without undue delay. Permitted development rights - a national grant of planning permission via the General Permitted Development Order (GPDO) – have historically allowed a range of agricultural buildings and operations without full planning consent (defrafarming.blog.gov.uk). For example, Part 6 of the GPDO provides automatic permission for certain agricultural buildings and extensions on active farms, subject to size limits and conditions. Traditionally, these rights let farmers erect structures like barns and silos (on larger holdings) up to a certain floorspace (formerly around 465m², later 1,000m²) under a fast-track prior notification process, unless in sensitive areas.

In the mid-2010s, the government introduced new change-of-use permitted development rights to help repurpose redundant farm buildings. In 2014, a right now known as Class Q was established, allowing agricultural buildings to be converted into up to three dwellinghouses (homes) without a full planning application (<u>researchbriefings.files.parliament.uk</u>). This marked a significant policy shift to enable rural housing re-use. In 2018 the Class Q right was extended - permitting up to five dwellings per farm (with a cap of three being larger homes over 100 m² each, and a total converted floorspace across all units not exceeding 865 m²) (researchbriefings.files.parliament.uk). These Class Q conversions required prior approval by the local planning authority (LPA) on matters such as transport impacts, noise, flooding and design, and have never applied on protected lands like National Parks, AONBs or Sites of Special Scientific Interest (researchbriefings.files. parliament.uk).

Alongside this, Class R permitted development rights were introduced in 2015 to support farm diversification. Class R allows the change of use of agricultural buildings to certain flexible commercial uses – for instance, a retail unit, restaurant or café, office, storage/distribution use, hotel, or leisure facility – up to a cumulative limit of 500 m² per agricultural unit (lichfields.uk). This enabled disused barns to host businesses such as farm shops, small rural offices, or holiday accommodation under a lighter-touch process. As with Class Q, Class R changes of use are subject to LPA prior approval checks (e.g. on highways, noise, contamination and flood risk) for larger conversions. Notably, Class R was available even in protected landscapes, whereas residential conversions under Class Q were not permitted in those areas.





May 2024 Updates to Class Q, Class R and Part 6

In May 2024, sweeping reforms to these agricultural PDR came into force via the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2024. The changes widened the scope of what farmers can do without full planning permission, in order to stimulate the rural economy.

Key changes included:

- Class Q (agricultural to residential) The qualifying date for buildings was updated: agricultural buildings in use as of 24 July 2023 can now be converted (replacing the old March 2013 cutoff). Conversions may include a modest expansion of the building envelope, as one single-storey extension up to 4 m long at the rear (not exceeding the original roof height) is now allowed to facilitate the new dwellings. The maximum number of dwellings permissible under Class Q has doubled from 5 to 10 dwellings, though each new dwelling is limited to 150 m² in size (down from a previous 465 m² cap per large dwelling). The overall floorspace that can be converted to residential use on a farm increased to 1,000 m² (up from 865 m² total). Other new conditions include a requirement that any building converted has an existing access to a public highway, and a clarified definition of the curtilage (yard area) allowed. Notably, the government decided not to lift location-based restrictions -Class Q conversions remain disallowed on Article 2(3) land (such as National Parks, AONBs and conservation areas).
- The range of allowable new uses under Class R was broadened. Farmers may now convert agricultural buildings to **general industrial** use (Use Class B2) for the processing of raw farm produce or livestock products on-site (with ancillary sales), and to **outdoor sport or recreation facilities** (Use Class F2(c)). Additionally, use of agricultural buildings for **educational/training** purposes (such as agricultural training centres) is now permitted under Class R. The maximum floorspace that can change use to these flexible commercial uses has been increased from 500 m² to 1,000 m², doubling the scale of potential diversification projects.

Part 6 agricultural building rights - For new agricultural buildings and works, the size thresholds under Class A (for larger agricultural units) have been raised. The maximum floor area of a building that can be erected or extended on farms larger than 5 hectares is now 1,500 m² (up from 1,000 m² previously). (The exception is that buildings to house livestock or plant/machinery stemming from engineering operations remain limited to 1,000 m², due to potential environmental impacts.) On smaller agricultural units (under 5 ha, covered by Class B of Part 6), the allowance for extending existing buildings was increased to 1,250 m² ground area (from 1,000 m²) and up to 25% of the building's original cubic content (previously 20%). A new restriction was added prohibiting the use of these general farm building PD rights on sites that are or contain scheduled monuments, to protect heritage assets. Transitional provisions in the 2024 Order allow any prior approval applications submitted before the changes took effect (i.e. before 21 May 2024) to proceed under the old rules until 20 May 2025, ensuring projects already in progress are not unfairly affected.

These updates represent a considerable reform of agricultural planning rights, expanding what can be built or repurposed on farms without a full application. The intent and potential economic implications of the changes are discussed in the next section.

Economic Potential of Better Regulation in Agricultural Planning

The primary rationale for expanding agricultural PDR is to boost the rural economy by removing planning hurdles that can hinder farm diversification and growth. According to the Country Land and Business Association (CLA), the rural economy is roughly 18% less productive than the national average, and excessive planning constraints are one contributing factor. A CLA member survey in 2023 found that about 93% of respondents felt the planning system was preventing economic growth in the countryside, and that lifting these barriers (for example, by extending PDR) could help add an estimated £43 billion to the UK economy (cla.org. uk). The 2024 reforms directly target this productivity gap by empowering farmers to diversify their revenue streams and make better use of their assets. The National Farmers' Union (NFU) has lauded the changes as "essential opportunities for farmers who wish to diversify their business, allowing them alternative streams of income and the ability to further support their local rural economy" (nfuonline.com). In practical terms, farmers can now pursue new enterprises on their land with far less red tape - whether converting an old barn into a farm shop or café, renting out disused buildings as offices or workshops, or opening up farm land for tourism and leisure uses. Notably, the new rights explicitly allow activities such as outdoor sports facilities, on-site processing of farm goods, larger farm retail outlets, and training centers without a full planning application (<u>nfuonline.com</u>), all of which create additional revenue avenues for farm businesses.



Image: Sarah Dyke MP

Some of the key diversification opportunities facilitated by the liberalised planning regime include:

- Rural tourism and leisure e.g. farm stays, holiday lets, camping or glamping sites, outdoor adventure or sporting facilities. These capitalise on farms' natural assets and cater to the growing demand for countryside recreation. (For example, one analysis showed that allowing temporary campsites on farms injected £25 million into rural areas over 2020–21. (cla.org.uk))
- Farm-based retail and hospitality e.g. farm shops selling local produce, farm cafés or tasting rooms, and agritourism attractions. By processing and selling products directly on-site, farmers can move up the value chain. The new Class R allowance for on-farm food processing and sales (B2 use) specifically enables ventures like farm dairies, micro-breweries or meat processing units that add value to raw agricultural products.
- commercial workspaces e.g. converting redundant barns into small business units, offices or craft workshops. This meets a growing demand for rural workspaces and enables farmers to earn rental income. Class R previously limited such conversions to 500 m²; now up to 1,000 m² can be created, allowing more extensive business hubs on farms. Such work hubs can create local employment and reduce the need for rural residents to commute to urban centres.
- Expanded agriculture enterprises The ability to build larger agricultural structures under Part 6 (now up to 1,500 m²) also has economic significance. It allows farms to invest in modern infrastructure - for instance, larger grain stores, machinery sheds or livestock housing – which can improve efficiency and output. Modern farming often requires substantial buildings for equipment like combine harvesters or for innovations such as automated milking parlours. By raising size limits, the PDR reforms let farmers undertake these upgrades with less delay and cost, enhancing productivity. The government noted that this greater flexibility will help farmers respond to challenges and remain competitive (newforestnpa.gov.uk). Additionally, better on-farm storage or processing facilities mean more of the supply chain value is retained on the farm (and losses from spoilage or transport are reduced), contributing to farm income.

- Housing and accommodation The expansion of Class Q (up to 10 homes) presents an economic opportunity as well as a social one. Farmers can create new housing units on their property which can be sold on the market or retained as rental properties, providing capital or income. The NFU has long advocated for more rural housing and welcomed the Class Q changes as helping meet housing needs in the countryside (<u>nfuonline.com</u>). New homes on farms can house family members or workers, or be rented to others, helping to sustain rural communities. In many areas, barn conversions under Class Q have been one of the few sources of new housing in hamlets and villages, supporting local population and services. While not a direct farm enterprise, the financial returns from enabling housing development can be significant for landowners, and are part of the "diversification" equation (often cross-subsidising the agricultural operations).
- Digestate/Phosphate storage and processing -The expansion of Part 6 would permit the circular economic use of digestates from feedstock. Around 80 tonnes of digestate are produced for every 100 tonnes of feedstock annually, and could be reapplied to the farm, whether through the sale of this digestate to other agricultural partners or on the farm itself, should it also farm livestock. Part 6 expansion would also permit greater capital investment and employment within agricultural communities, contributing to the increase in productivity and revenue generation for this sector specifically. There are also potential downstream deflationary effects on food prices, as the procurement of foreign, expensive chemical fertilisers falls (ons.gov.uk).

In aggregate, better regulating agricultural planning is expected to stimulate significant rural Gross Value Added (GVA). By one estimate, closing the rural productivity gap through such measures could be worth tens of billions of pounds to the economy (cla. org.uk). The government explicitly linked these reforms to its broader rural growth agenda, as set out in the 2023 Unleashing Rural Opportunity paper and the Rishi Sunak's Farm to Fork Summit commitments (<u>nfuonline</u>. <u>com</u>). Early evidence from similar past measures (e.g. previous barn conversion allowances) indicates that many farmers will seize the chance to diversify. The NFU reports strong member interest in using the new rights, seeing them as a way to secure farms' financial future amid pressures like the phase-out of direct EU subsidy payments. Indeed, with basic farm payments being withdrawn, the CLA emphasises that diversification will be "ever more important" to replace lost income (<u>cla.org.uk</u>). Overall, the economic potential of the PDR liberalisation lies in a more dynamic and resilient rural economy – one where farmers can adapt their land and buildings for a mix of agricultural and nonagricultural uses, generate new income streams, create rural jobs, and contribute to housing supply, all without unnecessary delay from the planning system.



Environmental Considerations

Any relaxation of planning controls raises questions about environmental and amenity impacts, and the 2024 agricultural PDR changes are accompanied by a set of safeguards and limitations. Existing checks and balances remain in place to mitigate environmental risks. Notably, the permitted developments still require prior approval from the local planning authority for specified issues. For example, converting agricultural buildings to homes or flexible use requires the LPA's prior approval on matters including transport and highway impacts, flood risk, noise and contamination (<u>defrafarming.blog.gov.uk</u>). Similarly, erecting a new farm building under Part 6 requires the authority's approval of details like siting, design and external appearance, to ensure the development is appropriate to its surroundings (defrafarming.blog.gov.uk). This prior approval process means that while a full planning application isn't needed, councils do review each proposal's critical impacts and can refuse prior approval if a proposal fails to meet the criteria or poses unacceptable impacts. In fact, councils can consider whether a proposed conversion's location or siting makes it impractical or undesirable (for example, a barn isolated from infrastructure) and can veto it on those grounds (researchbriefings.files.parliament.uk). These mechanisms help screen out the most environmentally problematic schemes.

There are also clear exclusions and limitations written into the PDR to protect sensitive environments. Class Q and related farm conversion rights do not apply in protected landscapes or other sensitive designations for instance, they cannot be used on Article 2(3) land, which includes National Parks, the Broads, Areas of Outstanding Natural Beauty and conservation areas (edgarslimited.co.uk). Listed buildings are excluded as well, and sites that contain scheduled ancient monuments are not eligible (<u>nfuonline.com</u>). (The 2024 amendments even added scheduled monuments to the exclusion list for Part 6 rights, underscoring heritage protection.) Similarly, Sites of Special Scientific Interest (SSSIs) are off-limits for these permitted changes (researchbriefings.files.parliament.uk). In addition, the regulations impose conditions on the physical development to limit visual and ecological impact for example, Class Q conversions may only extend the building in a modest way (one small rear extension within height limits) and must adhere to defined curtilage areas, ensuring the new residential use doesn't sprawl beyond the original footprint. Such rules help to contain the impact of development. And as with any development, separate environmental legislation still

applies (for instance, developers must comply with wildlife protection laws if bats or owls are present in a barn, even if planning permission is not required).

Despite these safeguards, some stakeholders have raised concerns about potential environmental risks:

- The Campaign to Protect Rural England (CPRE) and other conservation groups argue that expanding PDR could lead to inappropriate development that slips through full planning scrutiny. CPRE has cautioned that the proposals represent a "major step-backwards" by reducing opportunities for public consultation and bypassing the normal local planning process (cpresussex.org.uk). They point out that traditional planning applications allow for detailed consideration of design, landscaping, and cumulative effects considerations that might be harder to enforce via PDR prior approval.
- One risk is the **cumulative impact** of many small conversions: while each individual barn conversion or new shed might seem minor, the combined effect over time could alter the character of the countryside (for example, incrementally increasing traffic on narrow rural lanes or changing the historic built form of a farmstead).
- There are also biodiversity concerns: converting or refurbishing old agricultural buildings can disturb habitats (many farm buildings host bats, barn owls, and other protected species). Under PDR, there is no automatic requirement for ecological surveys as there would be in a full planning application, so some fear wildlife impacts might be overlooked though, as noted, wildlife law still requires developers to avoid harming protected species, planning permission or not.
- Another worry is that **undesirable uses** might proliferate. CPRE has given examples of what could go wrong: they warn that loosening the rules might allow activities like "markets, paintballing, motor sports, housing estates and leisure parks to pop up in an ad hoc way" on farmland, potentially causing noise, light pollution and loss of tranquillity in rural areas. While some of these examples (e.g. housing estates) would likely still require full planning permission, the general fear is that a permissive regime could invite "unsustainable development to the detriment of rural landscape character" (cpresussex.org.uk).

Importantly, the decision to keep National Parks and AONBs excluded from Class Q reflects environmental prioritisation by some quarters - even though there is demand for barn conversions in these areas, the government judged that "protecting landscape beauty" took precedence. (During the consultation, there was debate on this point: the government floated the idea of allowing conversions in protected landscapes to help provide local homes, but ultimately pulled back in face of opposition from landscape advocates.) CPRE and others welcomed this restraint, as they argue that even small-scale development can degrade valued scenery and set precedents in such areas. By contrast, farming groups note that reusing an existing building (as Class Q allows) is far less intrusive than building a new structure on greenfield land. In their view, enabling disused barns to become homes or businesses has environmental merit: it makes use of brownfield land and existing embodied carbon in buildings, and "reduces the pressure for new development on greenfield land" (newforestnpa.gov.uk).

This reuse-first approach aligns with sustainable development principles by recycling old buildings. Indeed, the government's own rationale for the PDR expansion highlighted that bringing redundant buildings back into use can revitalise rural areas without encroaching on undeveloped countryside (<u>newforestnpa.gov.uk</u>). There can also be indirect environmental positives: for instance, if farm diversification allows a family to work and live on the farm, that might reduce commuting emissions; or if onsite farm shops flourish, local consumers drive shorter distances for shopping, etc. Additionally, planning flexibility could make it easier for farmers to incorporate renewable energy and climate-friendly projects. A farmer who can quickly put up a new barn might install solar panels across a large roof to generate green energy (not needing separate permission for the panels if roof-mounted), or repurpose a building for a biomass boiler or battery storage to support renewables - all potentially aiding the UK's sustainability goals.

The 2024 agricultural PDR changes attempt to strike a balance between development and environmental protection. They come with a framework of prior approvals and limitations that act as guardrails against the most harmful impacts. Proponents emphasise the environmental benefits of reusing buildings and focusing development on previously-developed sites, whereas opponents urge vigilance that these eased rules do not inadvertently undermine landscape, biodiversity or local amenity. Going forward, careful monitoring will be needed. If problematic outcomes emerge (e.g. a proliferation of poor-quality conversions or loss of habitat), policymakers may need to adjust the regime or local authorities could deploy measures (like Article 4 directions to withdraw PDR in particularly sensitive locales). Conversely, if the system works as intended, it could demonstrate that rural economic growth and environmental stewardship are not mutually exclusive – for instance, a well-done barn conversion can preserve a heritage structure and provide a home, achieving both conservation and development aims. The existing safeguards, coupled with the inherent rural site constraints, suggest that many larger or impactful proposals will still trigger scrutiny, ensuring that most truly unsuitable projects will require full planning permission as before.



Policy and Stakeholder Debate

The expansion of agricultural permitted development rights has been met with mixed reactions, reflecting an ongoing debate between those prioritising rural economic growth and those concerned with planning oversight and countryside protection. On one side, farming and landowner organisations (such as the NFU and CLA) have strongly supported the reforms, seeing them as long-awaited relief from burdensome regulation. The NFU's leadership described the planning changes as "essential opportunities" that will "greatly support the modernisation, expansion and diversification of farms across the country", giving farmers "the freedom to decide the best uses for buildings on their land, without needless bureaucracy holding them back" (<u>nfuonline.com</u>). The NFU points out that virtually all of its recommendations were adopted in the new rules, after it lobbied in favor of a "massive expansion" of rural PDR in the 2023 consultation. The CLA has likewise welcomed the changes, aligning with its Rural Powerhouse campaign which argues that planning reform is key to unleashing rural economic potential (cla.org.uk). These groups highlight that most planning applications on farms tend to be approved eventually, so removing the requirement saves time and cost while arriving at the same outcomes more efficiently. They also note that diversification is increasingly critical for farm viability (especially post-Brexit, with subsidy cuts), and that the new rights will help farms stay resilient.

On the other side, a coalition of rural protection advocates – including CPRE (the Countryside Charity) and some local authorities, particularly in designated landscapes – have voiced strong reservations or outright opposition. CPRE has been one of the most vocal critics, characterising the PDR loosening as "a major step-backwards for society" because it circumvents the democratic, plan-led system established since the Town and Country Planning Act 1947 (cpresussex.org.uk). In its consultation response, CPRE argued that most rural planning applications are approved under the existing system anyway, and that giving blanket permissions through PDR would "further undermine the plan-led approach and lead to irrevocable damage to our countryside", especially in the most "treasured and protected landscapes". Their stance is that important decisions about rural land use should be subject to local scrutiny and policies, not automatic rights. This perspective is shared by many local planning authorities in rural areas, who fear loss of control and unintended consequences. For example, the New Forest National Park Authority warned that if the full range of proposed PDR expansions were implemented, it would "very likely have widespread detrimental impacts on the landscape ... and the socio-economic well-being of local communities", fundamentally undermining the carefully crafted local plan for the National Park (newforestnpa.gov.uk). Such authorities worry that national PDR rules cannot account for local nuances – a conversion deemed benign in one location might be harmful in another – and that they will be left to manage the impacts without the tools that the planning application process normally provides (such as attaching conditions or securing developer contributions for infrastructure).

The 2023 government consultation on these changes drew nearly 1,000 responses (<u>defrafarming.blog.gov.</u> <u>uk</u>), reflecting these polarised views. In the end, the policy that took effect in 2024 shows an attempt to balance the feedback. The government did adopt most of the liberalisations sought by farm groups (doubling conversion and building size limits, broadening uses, etc.), signaling a firm commitment to cutting "red tape" in line with its rural growth agenda. At the same time, it heeded certain concerns from the consultation by retaining key protective carve-outs – notably not extending Class Q rights to National Parks and AONBs, and not relaxing controls on new livestock buildings. The decision to keep protected landscapes off-limits to barn-to-home conversions was a win for CPRE and others who argued that these areas merit full planning oversight. (The NFU had actually supported allowing conversions in protected areas, noting that "these areas are often the hardest for new housing" and that adding barn conversions could benefit local communities without harming landscape quality. This remains a point of contention, with farm groups likely to continue lobbying for inclusion of protected landscapes in the future, whereas conservation bodies stand opposed.) Similarly, the exclusion of new intensive livestock buildings from PD rights disappointed farming representatives, but was expected given environmental sensitivities – any large pig or poultry sheds will still need full permission, which reassures those concerned about odor, waste and landscape impacts. These outcomes illustrate a push-pull dynamic: when pushing for growth, the government went as far as it believed it could without provoking unmanageable opposition, and pulled back on proposals that crossed a line (for example, early ideas to allow more development in National Parks were shelved after backlash).

The debate is far from settled. As the new rules roll out, stakeholders are watching closely. Farming and rural



business groups will be monitoring how effectively the changes generate new projects and income, and may press for further reforms if they see remaining obstacles – for instance, the 2023 consultation also floated extending PDR to other rural buildings beyond agriculture (such as disused equestrian or forestry buildings) (<u>newforestnpa.gov.uk</u>), which the government has not yet implemented but should revisit, in order to mirror paragraph 849c) of the NPPF ("the development would re-use redundant or disused buildings and <u>enhance its immediate setting"</u>). There is also interest in additional PDR to support rural innovation: the government issued a call for evidence on "naturebased solutions and farm efficiency projects" in that consultation, hinting at potential new rights in the future (for things like on-farm reservoirs, renewable energy installations or carbon sequestration projects). On the other side, campaigners like CPRE continue to advocate for tighter controls – they have even called for some existing PDR (like barn conversions in Green Belts) to be rolled back (cpre.org.uk). Local authorities, too, will assess the on-the-ground impacts; if problems arise, we may see more use of Article 4 directions to locally suspend PDR (albeit the National Planning Policy Framework now limits their use to exceptional cases). It's worth noting that 2024 was the eve of a General Election year, and planning policy could shift with a new administration. For now, the direction of travel is toward greater flexibility for the rural economy, tempered by targeted exclusions to protect the environment. The current state of reform is that the 2024 measures are in force and beginning to be used, with government officials expressing optimism that they will boost rural prosperity. "We are listening to farmers," as former Farming Minister Mark Spencer said, noting that helping them secure their businesses is a "top priority" (<u>nfuonline.com</u>).

Looking ahead, policymakers will need to continuously calibrate this balance. What lies ahead will involve finetuning the PDR framework based on its performance: if it delivers economic gains with minimal downside, there could be moves to expand it further (for example, revisiting the status of National Parks, or adding new permitted use cases as rural needs evolve). Conversely, if adverse effects materialise, there may be pressure to introduce new safeguards or reinstate planning requirements in specific scenarios. The debate between enabling development and exercising local oversight will likely continue. The hope among proponents is that a liberalised system, guided by prior approvals and sensible limits, can "unlock the enormous potential of the rural economy" without degrading the countryside (<u>cla.org.uk</u>). Detractors, however, will remind decisionmakers that once lost, rural character and natural assets are hard to regain, urging that economic gains not come at the expense of environmental and community well-being. Ultimately, achieving the twin goals of a thriving rural economy and a protected countryside will require ongoing dialogue, careful monitoring, and a willingness to adjust policy levers as England's experience with these new agricultural PDR unfolds.

Executive Summary of the Policy Proposal

The current Permitted Development Rights (PDR) framework under Classes Q, R, and Part 6 is overly restrictive, limiting economic growth, investment, and housing availability within Britain's agricultural sector.

Class Q Reforms

- Temporal Restrictions: Reduce the buffer period from 10 years to 7 years to facilitate quicker and more efficient conversions of agricultural buildings into residential dwellings, addressing rural housing shortages and preventing property depreciation.
- Size Restrictions: Considerations should be given to increase the square metre limit to allow flexible and efficient use of larger agricultural structures, promoting better living standards.
- Extension Rules: Amend restrictive criteria for building extensions, enabling optimised housing developments suited to local needs, thus alleviating rural housing pressures and improving conditions for agricultural workers.
- Change of definition: Amend the language in Class Q to permit the redevelopment of "rural" rather than strictly "agricultural" buildings, as per Paragraph 84(c) of the NPPF.
- Disaggregate building types: Remove the interrelationship between Class Q New Buildings and Class Q in general.
- Flexibility permissions: Allow for the replacement of buildings as well as conversion, especially as some buildings may not be structurally sound enough for the new purpose.
- Agricultural units: Disaggregate the allocation of PDRs, permitting redevelopment across multiple farmyards in an agricultural unit.
- Curtilage reforms: Increase the permitted curtilage which can have its usage change relative to the site's purpose of conversion, for example, permitting hedgerows, trees, and gardens.

Class R Reforms

- Digestate Handling: Expand Class R rights to include anaerobic digesters and storage of digestates without full planning permission. This supports domestic fertiliser production, reduces reliance on unstable international supply chains, and aligns with UK Net Zero targets through renewable biogas production.
- Environmental and Economic Benefits: Facilitates a circular economy, reduces agricultural river pollution, and diversifies farmers' income streams, enhancing overall agricultural resilience and sustainability.

Part 6 Reforms

- Material Appearance & Proximity Restrictions: Restrict appearance-based prohibitions to listed buildings only, and eliminate arbitrary distance restrictions regarding livestock accommodation and scheduled monuments.
- Size and Volume Restrictions: Remove height and volume limitations, granting farmers greater discretion in upgrading infrastructure, essential for improving agricultural productivity, animal welfare standards, and economic viability. Specifically, such reforms would significantly reduce costs and expedite essential agricultural investments, as demonstrated in the poultry sector example provided.

Collectively, these targeted reforms will foster growth, investment, and efficiency, revitalizing Britain's agricultural economy and alleviating rural housing challenges.

Outlined Policy Proposal (Class Q)

In order to unleash greater economic growth and investment in Britain's agricultural sector, landowners and farmers must have greater autonomy and certainty over how they develop their land. Currently, Permitted Development Rights in Agriculture are too restrictive. A multitude of problems are caused by the system as it stands, particularly when concerning the rural housing crisis, depreciation of capital and land, and no forward movement on investment into the rural economy.

Rural England's housing stock is only 9% affordable (housing.org.uk), pushing out younger families and lower-wage agricultural workers. Indeed, the median detached property in a rural area in England is 13.8 times higher than a median English detached property (lordslibrary.parliament.gov.uk). Or, at least, reducing their standards of living by diverting salaries into rental payments or deposit saving - this, too, has wider knock on effects for consumer spending in rural areas and affects the supply of agricultural workers (food.gov. uk). These pains are in spite of significant amounts of available, connected land across England - it is only regulations which slow down the solving of the rural housing crisis.

Class Q Permitted Development Rights allow for former agricultural buildings and builds on agricultural units to be converted into dwellinghouses. However, what should be a simple right to utilise one's own land, the restrictions are 5 times longer than the permissions. Moving through the 2024 regulations, I will outline where there are inefficiencies and

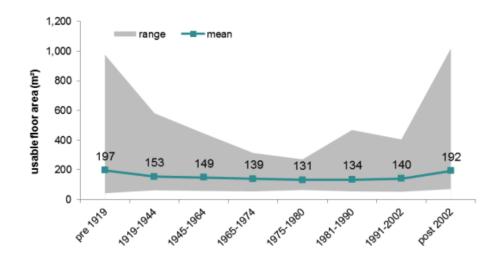
areas for improvement:

Q1 (a) through (b) places temporal restrictions on development. Whilst it is important to integrate antiavoidance measures into regulations, the 10 year buffer period between the site being struck off as an agricultural unit and permission under the regulations simply too long - over a ten year period property degradation is likely to be advanced, if it has been left vacant. Ismail, Yew, and Muhammad (2016) found that a vacant, reinforced concrete property "could fail to perform acceptable designed strength functions within a period of twelve (12) years" - brick buildings would likely perform less well, especially if environmental factors are more challenging. A ten year buffer between conversions adds additional costs, project management risks, lengthier delays to execution, and may put off conversion in the first place - the buffer period should be reduced to 5 years. A reduction in the period adds the requisite anti-avoidance challenge, whilst also removing burdens on the developer.

For agricultural units, especially as regulated by (b(iii)) where the use-case has changed to a non-agricultural unit, the buffer still applies. This should be reformed to 5 years as well, permitting easier unit conversions towards housing if the new unit is being underutilised or not performing as initially expected. Maddedu and Clifford (2023) demonstrate that less prescriptive changes in use cases results in more effective switching from commercial units to housing units, and have precipitated a large influx of housing on Britain's highstreets, where switching use cases was liberalised.

Restrictions placed on the size of a new dwelling are also restrictive, as seen in Q1(c). Class Q PDR places a 150 square metres upper limit on floorspace, which is the average size of a house built in 1945-64 (see below). England already has the lowest livable floorspace in Europe, decreasing living standards and increasing the impetus to change residences when the size of the family unit changes.

Figure 3.6 Usable floor area among detached homes, by dwelling age, 2012





The arbitrary 150 square metres rule also limits Class Q conversions of disused units, as some conversions may be made awkward if the, for example, barn is slightly larger than 150 square metres. This rule should be reformed to reflect the diversity of conversions, wherein if a barn or other large structure is to be converted, the number of dwellings within the space should be permitted regardless of the floor space of the unit.

Likewise, restrictions on Class Q(b) developments in clause (i) are arbitrary. Class Q cannot be deployed on extensions if the original building has more than one storey ((i)i), if the extension is not on the rear of the building ((i)ii), if the extension is longer than 4m away from the original building ((i)iii), or if the proposed eaves are higher than originals ((i)iv). These restrictions are arbitrary and stifling attempts to retain the local characteristics of an area, regardless of the individual unit's geographical location and context. These should be amended and made more permissive, allowing developers to better optimise properties for the people who will live in them, rather than curtailing space and capacity.

Class Q is currently excluded from National Landscapes / Parks and AONB, leading to a compounded depreciation effect for disused and derelict buildings. Abandoned buildings, and those in need of conversion, should be in-scope for Class Q and PDR regardless of their geography. Incumbent restrictions on development, which prevent developmental work being undertaken on buildings in the area in order to protect their aesthetic, ironically contribute to the underdevelopment and dilapidation of National Landscapes and AONB areas. Class Q should, therefore, apply to all rural areas, including National Landscapes and AONB, so that landowners can preserve and renew their structures for future generations.

Ensuring that landowners are given the leeway to undertake small housing developments on their own land would go a considerable way in solving localised, rural housing squeezes, and offering agricultural workers decent accommodation near their places of work.

Outlined Policy Proposal (Class R)

Class R of Permitted Development allows for the conversion of a building and any land within its curtilage to general industrial, storage, hotel, commercial, or recreational without needing full planning permission. Whilst these are generous, without straying into a loophole for the Town and Country Planning Act by allowing sui generis planning permission, there are individual restrictions which are particularly harmful for Britain's agricultural sector.

As laid out in R((d)i) and R((d)ii), the regulations only permit the storage of raw goods and materials – this is otherwise uncontroversial, until one considers that the agricultural supply chain constitutes a blend of raw and naturally processed materials.

Of note, the treatment, processing, and storage of digestate is not permitted by Class R permitted development rights. Instead, any application to install an anaerobic digester or, even, to store such material, requires full planning permission. Digestates, coming from energy crops and manure, can be turned into biogas, renewable fuel, fertiliser, and compost, all to be redistributed throughout the British agricultural supply chain.

Taking digestate-to-fertiliser as a core point - the British agricultural sector currently imports 60% of its fertiliser from abroad (fwi.co.uk), specifically imported from Russia, Belarus, and Turkey, with phosphorus based fertilisers coming from Morocco. This is a diversified, fractured international supply chain, and prone to disruption and political manipulation, which has been demonstrated since 2022. For example, nitrogen based fertilisers saw their prices jump by 152% between May 2021 and 2022, and have since struggled to return to a tolerable baseline. The overall cost to farmers during this period was £1.2bn, and required government intervention (researchbriefings.files.parliament.uk).

Permitting anaerobic digesters and storage for digestate storage through Class R permitted development rights, without subjecting farmers to the full planning process, would accelerate a number of key metrics for revitalising Britain's agricultural sector:

- 1. Circular economy: the recycling of biomass through processors would lessen the reliance on international supply chains for the fertiliser required to feed the British people. It would, in addition, lower the carbon footprint of fertiliser, with on-site and indigenous waste from animals being processed and disbursed locally. As part of the Circular economy initiatives, the Sustainable Development Goals set out by the UN have been shown to benefit from the proliferation of anaerobic digesters and storage (Piadeh et al, 2024). Likewise, the creation of biogas through digestate processing would move the UK towards its Net Zero targets, with the use of biogas forecast to increase from 0.8% of the overall energy mix today (ieabioenergy.com).
- 2. River pollution: Currently, artificial fertiliser is the primary cause of river pollution in the agricultural sector so too is unprocessed animal waste (earthwatch.org.uk). Farmers are aware of their role in stewarding the natural environment, and are eager to remove the overwhelming artificial fertiliser runoff from British rivers, instead treating their fields with less polluting natural digestate and biofertilisers.
- 3. Economic diversification: With large downward pressures on the agricultural sector, including from increased foreign competition for agricultural goods, higher input prices (from wage increases, new regulations on labour, and supply chain instability), and the addition of inheritance tax farming businesses require assistance in diversifying income streams to stay afloat. Anaerobic digestion and digestate processing would provide an additional income stream from selling surplus digestate to other farmers, and even consumers if the digestate is processed into compost.

However, Class R regulations are not the only area requiring reform to permit greater investment and renewal in the agricultural sector. Limits on size, found in Part 6 of the Permitted Development Regulations also require review.

Outlined Policy Proposal (Part 6)

Class B outlines a number of restrictions on development that are both arbitrary and overly prescriptive, thus limiting the expansion and improvement of the overall agricultural sector. Of note, Part 6 B1 clause (b) prohibits any material appearance changes to any building, regardless of whether it is listed or otherwise - there is no good reason for such a prohibition, especially if the unit being augmented is not within public view. This clause should be restricted to listed and protected buildings only.

Likewise, clause (d) prohibits the addition of livestock accommodating, or byproduct storage, within 400m of a protected building. The prescription here is arbitrary, and should be eliminated - instead it should be left to the discretion of the applicant and consulted on with the planning authority. This also applies to clause (g), which prohibits any permitted development if occurs within the curtilage of a scheduled monument - with over 20,000 scheduled monuments in Britain, this should be left to the discretion of the landowner and consulted on with the planning authority.

B2 also implements arbitrary limits upon land improvement and upgrades to machinery. Clauses B2 (a) through (c), and clauses B2 (e) through (g) impose height and volume restrictions upon permitted development, with these restrictions should be

removed and left to the discretion of the applicant and the planning authority - these restrictions are highly limiting on the ability of productive enhancement to agricultural performance and efficiency. The impact on individual agricultural businesses are significant; macroeconomically the evidence is overwhelming that a failure of farmers to utilise their land in a manner which is cogent with their business interests is contributing to a slow-down in agricultural productivity.

As an example, the British poultry industry is undergoing a reduction in stocking volume by 20%, in order to achieve higher welfare standards for their animals. Such a change in production requires the addition of 1,000 more sheds across the UK, at a cost of £300,000 per new shed and a timeline of around 3 years to execute. However, the current restrictions by Part 6 PDR, namely B1 and B2 clauses, is reducing the viability of a rapid and cost effective upgrade to animal welfare standards and investment. For example, the average cost of an application, through the Town and Country system, adds an additional planning cost of £35,000 per shed – by reforming the PDR regime, this cost could be reduced to £1,000, and permitting the more rapid and profitable upgrade to productive capital in this particular sector.



Image: Sarah Dyke MP

Additional Policy Proposals to Strengthen the Rural Planning Framework

To unlock further economic value and development potential across England's countryside, additional reforms to the planning framework are required. These measures aim to streamline development processes, reduce regulatory ambiguity, and empower rural communities and landowners to deliver sustainable growth. We are grateful to the CLA for their advice on these policies, with which we agree.

Reform of Part 6, Class A: Distinction Between Built and Engineering Works

Permitted Development Rights under Part 6, Class A currently permit agricultural development and associated engineering operations, including excavation and construction. However, the existing drafting is convoluted and routinely causes confusion for both applicants and local planning authorities.

To enhance clarity and application consistency, Class A should be bifurcated into two distinct categories:

- Class A1 Built development (e.g. new farm buildings, extensions)
- Class A2 Engineering operations (e.g. tracks, reservoirs, excavation works)

This division would reduce misinterpretation, avoid misclassified applications, and streamline the determination process. In particular, it would improve policy certainty for enabling critical rural infrastructure such as water storage, slurry handling, and access improvements.

Extension of Temporary Land Use under Class B to 60 Days

The introduction of Class BC has allowed temporary camping uses for up to 60 days, but removed this allowance from Class B. We recommend Class B be permanently amended to allow up to 60 days of temporary land use per calendar year, in line with contemporary land-based leisure trends and tourism demands.

Furthermore, the current requirement to seek prior approval every year when operating in flood risk zones under Class BC is unnecessarily burdensome. A one-time prior approval, unless flood risk conditions materially change, would offer a more proportionate

regulatory approach. This change would reduce administrative overhead while retaining environmental safeguards.

Introduction of Permission in Principle (PiP) for Rural Economic Development

The adoption of a Permission in Principle (PiP) model for rural economic development would de-risk investment in rural land by separating land-use consent from technical design approval. The two-stage process (PiP followed by Technical Details Consent) allows developers to secure broad support for a site's use before incurring full technical and professional costs.

This would be particularly valuable for rural sites that currently fall outside existing Permitted Development frameworks. Unlocking such land could stimulate business growth, diversification, and job creation in remote communities, while still allowing local authorities to assess site-specific details at a later stage.

National Policy Support for Development of Redundant Agricultural Sites

A new national planning policy should be adopted to explicitly support the redevelopment of redundant agricultural buildings and land that do not qualify for PDR. At present, these sites fall into a regulatory grey zone - neither prioritised for reuse, nor clearly protected - resulting in inconsistent treatment across local authorities. This should build upon NPPF paragraphs 84(b) and (c).

A clear national steer would:

- Encourage productive reuse of underutilised land
- Support farm diversification in line with government growth targets
- Provide a consistent basis for decision-making across local areas



Reform of the NPPF Definition of 'Affordable Housing'

The current NPPF definition of affordable housing for rent requires landlords to be registered providers with the Regulator of Social Housing, even for homes delivered through rural exception sites (RES). This regulatory constraint effectively excludes private landowners and community-led projects from delivering genuinely affordable rural housing.

We propose amending the NPPF definition to remove the requirement for a registered provider, allowing local councils to judge affordability on the basis of rent levels and need. Precedent already exists, particularly with Arms-Length Management Organisations who control around 200,000 units.

This change would unlock new rural affordable housing opportunities at scale, particularly in areas where Registered Providers are absent or unwilling to develop.

Expansion of 'Grey Belt' to Include Rural Redundant and Disused Agricultural Land

The current definition of 'Grey Belt' in plan-making excludes redundant agricultural sites from consideration because such land is explicitly omitted from the definition of "previously developed land" (PDL). This omission undermines the policy's intent to facilitate development in low-contribution areas of the Green Belt and rural areas.

Indeed, by omitting previously developed land, and yet not grading it as grey belt, developers and land-owners are in an uncertain legal space - the consequences of which is a lower efficacy for said land.

To address this, the definition of Grey Belt should be amended to include redundant or disused agricultural sites, particularly where such land and buildings no longer serves modern farming needs and could instead support housing or economic diversification. Doing so would create a rational planning route for reuse of brownfield-like rural sites currently trapped in limbo.

Expansion of Exceptional Development Criteria in Green Belt Policy

Paragraph 154 of the National Planning Policy Framework allows for specific exceptions to Green Belt restrictions. This list should be expanded to include:

"Development for the purpose of rural economic diversification or the adaptation of agricultural holdings"

Such a clause would enable proportionate development of farm shops, small business units, or processing facilities within Green Belt areas - aligning planning policy with DEFRA's own objectives on rural economic renewal. This would also acknowledge that preserving Green Belt character does not preclude sustainable economic uses of existing rural land.

Reform of Class S: Agricultural Buildings to Educational Use

Currently, Class S of the GPDO permits agricultural buildings to be converted into state-funded schools. This is too narrow. We propose expanding Class S to include:

- All educational facilities, including non-state funded schools
- Specialist services such as care farms, agricultural education centres, and therapeutic or vocational learning environments

This change would support the growing demand for health, wellbeing, and training services in rural settings, where farm environments are particularly well-suited to alternative education delivery models.









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