

INTRODUCTION

Glanvill Partners Ltd are the owners of Rydon Farm in Woodbury and large areas of agricultural land in the district. It is in this context that the following representations are made on the East Devon Local Plan Regulation 19 Consultation Draft.

CHAPTER 9. SUPPORTING THE ECONOMY AND TOWN CENTRES

Policy SE03: Farm Diversification

Strategic Policy SE03 sets out the Council's policy in relation to farm diversification proposals. Broadly, the policy seeks to allow new employment uses provided these uses require a rural location and are subordinate in nature to the wider farm use. To be acceptable, the policy requires that diversification proposals meet a number of tests.

Our client supports strongly the inclusion in the East Devon Local Plan of a policy that supports farm diversification. Over recent years, it has become increasingly necessary for our client to diversify farming operations in order to future proof the business and it is the correct approach to carry such a policy forward into the new Local Plan.

However, for the reasons set out below, our client objects to Policy SE03 as drafted currently. Ultimately, the policy is far too restrictive and will unreasonably curtail appropriate farm diversification schemes.

Draft Policy SE03 is far more restrictive than its predecessor (adopted Local Plan Policy E4) by expressly supporting employment uses, rather than allowing more widely (as Policy E4 does) *'proposals to diversify and expand upon the range of traditional agricultural related economic activities undertaken in rural areas....'* The more restrictive approach that is proposed will prevent other viable, complementary uses from coming forward that could otherwise be well-accommodated into the farm operation and generate additional, and much needed, income streams.

In addition, Policy SE03 adds a requirement for the development to require a rural location, which is unreasonably restrictive and unnecessary. The location of the development will be dictated by the location of the farm that is seeking to diversify. Taking self-storage as an example, one might argue that this does not require a rural location as such as use is also suitable in urban areas. However, it has been proven that self-storage facilities can complement and be compatible with farming

enterprises. The four conditions set out in the policy that proposals must adhere to are sufficient to ensure that proposals to diversify are suitable and appropriate for their location. This stipulation requiring a rural location introduces a degree of ambiguity which is unlikely to be helpful to either applicants or the Council in deciding how to apply the policy. This part of Policy SE03 should, therefore, be reworded.

Policy SE03 as written relies on the provision of additional guidance on viability, which will be prepared in the future. It is not clear at this stage how onerous this guidance will be or what it means for the policy itself. It is unreasonable to ask for this policy to be endorsed in advance of a crucial part being available.

Criterion A of Policy SE03 requires not only that diversification proposals be compatible with the farm operation but also that they be ancillary to it. Again, this is far too restrictive. In land use terms, this would require any proposal to be directly linked to the existing farm operation. Whilst being subservient, many diversification proposals will not actually be ancillary to the farm operation, but distinct from it. Uses such as self-storage might be entirely appropriate to the location but are unlikely to be considered ancillary to the existing farm business.

Finally, Criterion D requires any new buildings needed as part of the diversification scheme to be sited within or adjacent to an existing group of buildings. This requirement is too onerous. There may be good operational reasons (noise, disturbance etc.) why the proposed building cannot actually be adjacent to existing buildings. We would suggest that some additional flexibility be allowed to allow siting of buildings within the farm unit and this part of the policy should be reworded accordingly.

In light of the concerns set out above, this part of the Local Plan is not justified and is not sound. Policy SE03 should be modified as follows:

“Farm diversification will be supported where the development is subordinate to and supports the long-term financial viability of the farm.

Proposals for farm diversification will need to meet all of the following:

- A. The proposal is compatible with, and will be a subordinate component of, an existing and active farm enterprise and contributes to the continuing viability of the farm as a whole, retaining existing or providing new employment opportunities and services for the local community;*

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- B. Development, in terms of its scale, nature, location and layout, does not detract from or prejudice the existing agricultural undertaking or its future operation;*
- C. Any existing suitable buildings are re-used or adapted; and*
- D. Any new building (and parking and other structures/storage) is modest in scale and sited in or in close proximity to an existing group of buildings.”*