

**EAST DEVON LOCAL PLAN 2020-2040**

**PREFERRED OPTIONS REG.18 CONSULTATION DRAFT PLAN – AUTUMN 2022**

**REPRESENTATIONS ON BEHALF OF MR. J. PERSEY**

**Introduction**

Bell Cornwell LLP acts as planning consultant for Mr. J. Persey. Mr Persey and his family are long standing owners of large areas of agricultural land in East Devon. Our client's interests include much of the land around the village of Plymtree and the surrounding area. The family continue to farm the land today, and also have commercial operations including Fordmore Farm Shop and other commercial space on the East Devon / Mid Devon border.

Our client therefore has a wide range of land and building interests in the district and they are actively promoting a site for housing in the village of Plymtree (Plym\_03). This site has been subject to a positive pre-application discussion with the Development Management Team. Our client therefore, has significant interest in the future local plan for the district. Against this background, the following comments are made on the draft policies within the East Devon Local Plan Preferred Options and previous Call for Sites submissions made directly by Mr. Persey.

We would urge the LPA to provide a formal allocation in Plymtree on the Plym\_03 land and we have provided further technical information to demonstrate how this could be achieved.

**The Vision for East Devon**

The draft local plan sets out a proposed vision for East Devon. This seeks to provide better homes and communities for all, promote a greener district, which address climate change and supports the natural environment, and encourage a more resilient local economy. Mr. J. Persey supports this vision.

### 03 The Spatial Strategy of the Plan

#### 1. Strategic Policy – Spatial Strategy

The overall strategy is to focus most development within the West End of the district. The settlement hierarchy then identifies one principal settlement (Exmouth), where significant growth is proposed. Below this are main centres, which are towns that are also able to accommodate significant growth, followed by local centres and villages, where development will be supported.

A dispersed spatial strategy that increases the number of locations where some development can be accommodated is supported. This should ensure that local needs are met more adequately and also allows short term housing delivery in the early years of the plan through village specific sites, rather than being totally reliant on long term housing delivery through a new settlement.

Whilst it is logical for the West End to play an important role, given the area's proximity to Exeter, the settlement hierarchy is correct to emphasise the potential other settlements, particularly villages such as Plymtree, to accommodate growth district-wide. Service villages can play a really important role in delivering housing growth and allowing villages to sustain themselves and their existing facilities, through modest amounts of growth.

As such this strategic policy is sound and supported and we note that development, in principle, is supported in all service villages as stated below:

- Allow limited development to meet local needs at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimble.

The identification of Plymtree as a Service Village is supported. The village has a good range of facilities (school, shop, pub) and is not environmentally constrained being entirely outside of the AONB. It ultimately has more facilities and is less environmentally constrained than many other villages in the district. It is a perfect village to receive an allocation, and the scale and form of growth can be carefully controlled through local development management policies so that it complements the character of the area and helps meet local needs. Collectively, villages could make a meaningful contribution to the district's overall housing land supply and growth of this type would also have the advantage of diversifying supply, meeting local needs and supporting rural facilities.

There is also potential for some of the smaller villages and hamlets across the district that would be classed as 'open countryside' to take some limited, small-scale growth, especially in those areas that fall outside of sensitive landscapes, for example, areas outside of the AONB. In this regard, hamlets such as Luton should not be overlooked. Limited residential development in such areas would have social benefits i.e local rural facilities would be supported, both within the smaller villages and hamlets and within larger villages nearby (as is highlighted in paragraph 79 of the NPPF). Ultimately, rural housing is essential to ensure viable use of local facilities.

Equally for employment development, sufficient provision must be made in the new local plan to support economic development right across the district so that growth is not stifled or lost to locations outside of East Devon. It is important to ensure that the new local plan can deliver sufficient supply to allow for choice and flexibility in the local market. Again, it is logical for the West End to continue to make an important contribution to large-scale employment provision but there needs to be more flexibility in the new local plan to allow other employment locations to come forward and ensure that all employment needs are catered for. As has been highlighted in representations to earlier versions of the draft local plan, the West End sites are aimed predominantly at medium to large-scale employers serving national and regional markets and are geographically remote from much of the district. It is vital that proper provision be made for small and medium sized businesses in the right locations i.e. close to their markets and transport networks and that this provision is not stifled by overly restrictive planning policies.

A dispersed strategy aligns with key objectives of national planning policy to support prosperous rural economies i.e. paragraphs 84 and 85 of the NPPF, which state:

*“Planning policies and decisions should enable:*

*a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*

*b) the development and diversification of agricultural and other land-based rural businesses;*

*c) sustainable rural tourism and leisure developments which respect the character of the countryside; and*

*d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.”*

*“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”*

## 2. Housing Distribution

We would refer officers to the housing distribution table below which is set out in the Local Plan under Strategy 2. The housing distribution policy as drafted is not sound or justified with regard to the lack of housing provision allocated at Plymtree.

<b>2. Strategic Policy – Housing distribution</b>						
New housing will be distributed across East Devon in accordance with the table below. The housing numbers are gross and relate to the period 2020 to 2040, the new town has a longer term vision that takes into account the likely timescale for delivery and will see development of an extra 5,500 homes beyond 2040.						
Settlement	Completions 2020-22	Commitments	Preferred Sites	2nd Choice	Total Allocations	Grand Totals
<b>Western side</b>	<b>841</b>	<b>1,800</b>	<b>7,250</b>	<b>0</b>	<b>7,250</b>	<b>9,891</b>
New town	0	0	2,500	0	2,500	2,500
North of Topsham	0	0	580	0	580	580
Cranbrook	543	801	4,170	0	4,170	5,514
North of Blackhorse	298	999	0	0	0	1,297
Other locations	0	0	0	0	0	0
<b>Principle and Main Centres</b>	<b>691</b>	<b>1,559</b>	<b>1,712</b>	<b>1,515</b>	<b>3,227</b>	<b>5,477</b>
Exmouth	269	654	287	746	1,033	1,956
Axminster	111	209	680	370	1,050	1,370
Honiton	167	272	182	289	471	910
Ottery St Mary	80	37	248	40	288	405
Seaton	32	216	147	70	217	465
Sidmouth	32	171	168	0	168	371
<b>Local Centres</b>	<b>70</b>	<b>160</b>	<b>572</b>	<b>174</b>	<b>746</b>	<b>976</b>
Broadclyst	0	3	175	0	175	178
Budleigh Salterton	39	56	20	132	152	247
Colyton	19	79	25	24	49	147
Lympstone	8	10	197	0	197	215
Woodbury	4	12	155	18	173	189
<b>Service Villages</b>	<b>252</b>	<b>549</b>	<b>421</b>	<b>167</b>	<b>588</b>	<b>1,389</b>
Beer	1	43	0	0	0	44
Branscombe	0	0	0	0	0	0
Broadhembury	0	0	0	10	10	10
Chardstock	0	0	30	0	30	30
Clyst St Mary	2	12	72	30	102	116
Dunkeswell	2	6	43	0	43	51
East Budleigh	2	7	0	0	0	9
Exton	4	1	50	0	50	55
Feniton	13	9	42	0	42	64
Hawkchurch	1	0	38	0	38	39

Kilmington	1	1	47	5	52	54
Musbury	0	16	15	10	25	41
Newton Pophleford	6	15	0	0	0	21
Otterton	14	3	0	23	23	40
Payhembury	0	0	0	0	0	0
Plymtree	1	2	0	0	0	3
Sidbury	0	0	0	38	38	38
Stoke Canon	4	0	0	0	0	4
Tipton St John	5	0	0	45	45	50
Uplyme	3	7	0	0	0	10
Westclyst	188	421	0	0	0	609
West Hill	5	3	51	6	57	65
Whimble	0	3	33	0	33	36
<b>Countryside</b>	<b>99</b>	<b>335</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>434</b>
<b>Grand Total</b>	<b>1,953</b>	<b>4,403</b>	<b>9,955</b>	<b>1,856</b>	<b>11,811</b>	<b>18,167</b>

The Grand total, above, does not include projected future windfalls. Including the windfalls would add around an extra 2,335 dwellings to the overall grand total. Cranbrook supply figures are mostly allocations in the Cranbrook Plan and the 4,170 figure is **not** actually a preferred site it is an adopted Development Plan Document figure.

Figure 1 - Proposed housing distribution across in East Devon in the Draft Local Plan

Our representation focuses on the unjustified imbalance that is proposed for housing distribution at the Service Village level with regard to the lack of allocation proposed at Plymtree.

Plymtree is set to deliver just 3 houses across the plan period – these are existing commitments. This is an unreasonable position given the facilities that exist. We would ask officers to note the following headline points:

**1. The constraints identified in the SHELAA against this site do not prevent development coming forward.**

The lack of allocation seems to be based against a false premise in the SHELAA assessment work that implies the sites put forward for development are unsuitable for allocation due to heritage and character constraint. This is not a reasonable, sound or justified position.

An indicative layout is submitted with this representation showing how development can be accommodated. Professional advice has been sought from a consultant team and the site is deliverable. Access can be safely achieved, there is no ecology constraint that would prevent the site coming forward, and despite the presence of listed buildings, these can be designed around – this would be through the inclusion of a central village green with the site that would providing an appropriate setting for the assets identified. Similarly, development can be delivered at a density that is commensurate with local character. The issues identified are

design issues and not constraints that would prevent allocation.

The site we are looking to allocate has previously been identified as being suitable for circa 30 dwellings through earlier SHELAA assessment. This (or a slightly lesser figure if preferred) should be the allocation for the village.

**2. The LPA could draft an allocation policy that would allow for recognised constraints to be considered whilst delivering an allocation in one of EDDC's sustainable villages.**

Through rework recent work it is now being suggested that the land in question is not suitable because of:

- a. Heritage – presence of listed buildings
- b. Character - The east of the site is poorly related to the built-up area... The site constraints and context do not support allocation at this stage.

Whilst we strongly believe these concerns can be designed around, if the LPA still feel this is a fundamental concern there is scope to introduce individual site specific requirements into allocation policy.

We would draw your attention to the adopted Mid Devon Local Plan where, similar to East Devon, many villages are located around a historic core. The LPA recognised the importance of allocating in villages and therefore produced policies that required specific consideration of heritage issues as part of the allocation. The LPA also have the ability to reduce housing numbers below 30 and/or reduce the size of the allocation. Plymtree must not be dismissed out of hand.

We would ask you to look at allocation SA1 (Sandford) and the accompanying planning application we submitted which addressed this issue. The policy for Plymtree could state the following:

*A site of X hectares at Plym\_03 is allocated for residential development, subject to the following:*

- a) X dwellings with X% affordable housing;*
- b) Buffer strip of planting and use of open space to protect the setting of adjacent listed buildings; and*
- c) Careful design and landscaping to protect views towards the Church.*

The housing numbers could be expressed as a minimum and the site could be bought forward.

**3. Draw the settlement boundary around Plym\_03 to allow development**

An alternative way of dealing with this site, and noting the intention of Strategy 6 of the Local Plan (Policy states that within the settlement boundaries defined on the Policies map development will be supported in principle), this approach could be taken with Plym\_03.

The land could be included in the settlement, and where the policy states that, "...This does not mean that all development will be acceptable within settlement boundaries: proposals will be considered on their own merits having regard to other policies in this plan and any made neighbourhood plan..." technical issues could be considered. This would allow a housing scheme to come forward that considers bespoke site constraints.

**4. Support has been expressed for development of the site through pre-application discussions to the LPA.**

The site is now, following the submission of a pre-application enquiry to the LPA, was supported by the Member Working Group which recognised the benefit of development in this location given the facilities that exist locally. In this regard, a planning application is due to be submitted to the LPA in May 2022. This should be factored into the LPA's considerations of the site and again points toward allocation.

**5. There is a general lack of reasonableness in terms of the approach to Plymtree village compared to other villages who are getting significant allocations at the Service Village level.**

Looking at housing growth and distribution in other villages we would make the following comments:

Chardstock: is getting an allocation for 30 dwellings, but has no bus service (Plymtree does) and similar facilities to Plymtree.

Exton: is getting 50 dwellings but has no primary school – Plymtree does have a school which additional children could support.

Hawkchurch: is receiving 38 dwellings and has very similar facilities to Plymtree.

Musbury: is receiving 25 dwellings and has very similar facilities to Plymtree.

Tipton: is receiving 45 dwellings and has very similar facilities to Plymtree.

Against this backdrop it is unreasonable for the LPA to exclude Plymtree from the list of villages that can benefit from an allocation, particularly when the evidence base behind the Local Plan suggests that an allocation is perfectly reasonable. The Role and Function of Settlements – Final Draft report which forms part of the evidence, clearly indicates that Plymtree should benefit from an allocation and it is more sustainable and has more facilities than some of the locations that are getting significant sites allocated.

In conclusion, Strategy 2 is not reasonable, sound or justified, and it should be amended to allow for an allocation in Plymtree for all of the reasons set out above.



### 3. Strategic Policy – Levels of future housing development

The new local plan should plan for at least the minimum housing requirement proposed (946 homes per year) in order to introduce greater flexibility into the district's housing supply and ensure a properly robust supply of housing. It is crucial that the words 'at least' remain in the policy.

Paragraph 3 of the draft policy states that provision will be made for a supply headroom of approximately 10% to provide housing supply flexibility in the district in the plan period and this is supported. However, it is noted in the supporting text (paragraph 3.17) that the potential housing sites being considered in this draft local plan only provide about 8% headroom. This surely suggests that additional sites need to be considered for housing development, otherwise the new local plan will be at risk of not providing sufficient supply flexibility. In this regard, a Plymtree allocation can clearly help the LPA.

Increasing the overall supply of housing will help to increase the amount of affordable housing that is provided for the district. The draft plan requires an affordable housing requirement of 4,070 dwellings but the current evidence indicates realistic prospects of delivering just 3,551 dwellings in the plan period. This is a shortfall of 519 dwellings and, of course, there is the possibility that some of the planned for 3,551 affordable homes will not come forward. Rather than relying on qualifying sites to be able to deliver a higher percentage of affordable housing, a safer approach would be to allocate additional sites in the local plan. Again, an allocation in Plymtree can help assist with this objective.

The provision for at least 10% of housing supply over the plan period to be met on small and medium sized sites (which the NPPF defines as sites no larger than one hectare) is supported. With small-scale sites, housing is more likely to be provided in locations where it is really needed and to be delivered quickly. Smaller sites are also more likely to achieve wider objectives relating to housing need and would support the vitality of rural settlements. This is again another benefit of allocating in Plymtree. A small site like this can be available to a range of house builders and will allow for delivery in the early years of the Local Plan.

Paragraph 8 of the draft policy will set out the housing provision requirements for designated areas in East Devon. It is not possible to comment on the approach at this stage as the data on housing provision requirement is not yet available – the draft policy states this information will be completed following consultation on the methodology for identifying the scale of housing provision requirement in Designated Neighbourhood Areas. The right to comment is reserved for when this data is publicly available.

A key element of the draft Local plan's strategic approach is to deliver a new settlement on land to the east of Exeter, around the A3052 corridor. Three different options are presented. The final choice of option, presuming that the delivery of a new settlement is carried forward into the final version of the local plan, could have significant implications on the overall housing strategy, both in terms of numbers and locations. Progressing the local plan without a decision having been made regarding the new settlement is, therefore, premature with regard to a location like Plymtree, where it can clearly take an allocation of housing, but hasn't been given one because housing numbers are allocated

Elsewhere. We also note that work is still be done on all allocations proposed to the west of Exeter – there must be uncertainty with the timing of delivery of some of the allocations proposed (e.g. due to fragmented ownership or infrastructure costs with creating new communities)

In this regard, the LPA will also have learned lessons from Cranbrook in terms of the implications that creating a new town (and the time this takes) has on ensuring the council can maintain an appropriate 5 year land supply – delivering a new town takes time and requires significant infrastructure. Therefore, to ensure the council can maintain a healthy supply of housing sites it would be sensible to allocate a number of smaller sites like Plym\_03 to maintain delivery numbers in the early years of the plan before housing at any 2<sup>nd</sup> new town becomes available.

#### 4. Strategic Policy – Employment Provision and Distribution Strategy

The draft policy states that provision will be made for a net increase of sufficient new employment floorspace to meet need and ensure that a choice of appropriate land is available in sufficient quantity, and of the right quality, to drive the economic growth of, and support prosperity in, East Devon. More clarity is needed on precisely what is meant by ‘a net increase’ and ‘sufficient new employment floorspace.’

It is clear that there is a continuing shortage of sites available for small and medium sized businesses across the district, outside of the West End. These businesses play an important role in the local rural economy and it is vital that proper provision be made for them in the right locations, for example, close to existing operations and main road networks.

The scale of new development/level of need for the district has not yet been decided upon – the draft policy states that this will be informed by the ongoing Economic Development Needs Assessment (EDNA), which will be ‘available in time’. The EDNA will also inform the Council’s site selection and site capacity estimates. This is a fundamental part of the local plan strategy and it is premature to advance the draft local plan in advance of the EDNA being published and properly considered. Such important aspects of the local plan must be informed/supported by robust evidence. As it stands, there are fundamental uncertainties.

In conclusion, there is insufficient evidence to inform the employment strategy at this time, with the EDNA not having been completed. Ultimately, a sufficient supply of all types of employment land needs to be made available across the district and it is logical for there to be a focus on future-proofing established employment locations.

## 6. Development within Settlement Boundaries

Policy states that within the settlement boundaries defined on the Policies map development will be supported in principle. This approach is supported... but in the case of Plymtree this is conditionally on the basis that Plym\_03 is shown as being located within the settlement boundary as a suitable site for development.

## 7. Strategic Policy – Development beyond Settlement Boundaries

Whilst it is important to protect the landscape, amenity and environmental qualities of the East Devon countryside, there must be sufficient flexibility in the new local plan to allow windfall development to come forward and be judged on its own site specific merits to ensure that the needs of the rural communities can be met. Greater flexibility therefore needs to be built into this policy.

## 06 Strategy for development at Principal Centres, Main Centres, Local Centres and Service Villages

### 26. Strategic Policy – Development at Service Villages – Plymtree

We would draw officers to all points made at Strategy 2, which are repeated below. Strategy 26 is not sound, justified or reasonable because no sites are located in Plymtree, which directly conflicts with the evidence base for the plan that confirms such an allocation would be suitable in this location.

Plymtree is set to deliver just 3 houses across the plan period – these are existing commitments. This is an unreasonable position given the facilities that exist. We are asking for Plym\_03 to be allocated, and it should be allocated for the following reasons:

#### **1. The constraints identified in the SHELAA against this site do not prevent development coming forward.**

The lack of allocation seems to be based against a false premise in the SHELAA assessment work that implies the sites put forward for development are unsuitable for allocation due to heritage and character constraint. This is not a reasonable, sound or justified position.

An indicative layout is submitted with this representation showing how development can be accommodated. Professional advice has been sought from a consultant team and the site is deliverable. Access can be safely achieved, there is no ecology constraint that would prevent the site coming forward, and despite the presence of listed buildings, these can be designed around – this would be through the inclusion of a central village green with the site that would providing an appropriate setting for the assets identified. Similarly, development can be delivered at a density that is commensurate with local character. The issues identified are design issues and not constraints that would prevent allocation.

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- c. constraints and context do not support allocation at this stage.

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In conclusion, Strategy 26 is not reasonable, sound or justified, and it should be amended to allow for an allocation in Plymtree for all of the reasons set out above. The site is close to Cullompton and within 5 miles of Honiton and can accommodate growth.

The lack of an allocation also conflicts with the supporting text of the Local Plan, which is titled "Plymtree – What the settlement is like"

Paragraph 6.187 confirms, "...Plymtree has a limited range of strategic, but a good range of local services and facilities including a shop and primary school. Although rural and attractive including a number of listed buildings, it is outside the AONB..."



In terms of suitability for development, paragraph 6.189 confirms, “Although in a rural location, Plymtree contains a range of services and facilities and is consequently appropriate to accommodate a small level of growth in the Local Plan...”

However, the plan as it stands accommodates no growth. This is a fundamental flaw. The site is not in the AONB and there are no constraints to seeing development on the site – any issues relating to heritage and character can be designed around.

The site also has the potential to offer up a series of public benefits including better connectivity between other parts of the village (the shop and residential accommodation), the primary school and the village hall and sports facilities given our clients land holding.

Furthermore, the site is close to a range of local facilities and services and adjoins and faces existing residential properties (i.e. this is not a remote, isolated location in the countryside). Allocating this site in Plymtree would also help to fill the shortfall in housing supply headroom and help to deliver more affordable housing for the district.

### 53. Farm Diversification

The inclusion of a rural diversification policy is supported strongly. It is becoming increasingly necessary for farmers to diversify in order to retain a viable business. Current Local Plan Policy E4 has proved successful in bringing about complementary new uses with economic benefits for rural areas, and it is the correct approach to keep such a policy.

As drafted, draft policy 53 is more restrictive than its predecessor by expressly supporting employment uses, rather than allowing *'proposals to diversify and expand upon the range of traditional agricultural related economic activities undertaken in rural areas....'* A more restrictive approach is likely to prevent other complementary uses that would bring about social and economic benefits, but which would fall outside of traditional employment uses classes, from coming forward, which could prevent additional and much needed income streams. Paragraph 1 of draft policy 53 does not need to be so restrictive in terms of uses – the criteria within paragraph 3 of the policy will ensure the acceptability of proposals.