

EAST DEVON LOCAL PLAN 2020-2040

PREFERRED OPTIONS REG.18 CONSULTATION DRAFT PLAN – AUTUMN 2022

REPRESENTATIONS ON BEHALF OF COMBE ESTATE

Introduction

Bell Cornwell acts as planning consultant for Combe Estate, the long standing generational owner of large areas of agricultural and forestry land in East Devon. Our client's interests primarily include land at Honiton and Gittisham. Combe Estate are also the owner/operator of the Combe Farm Shop and Combe Garden Centre located on the edge of Honiton. They therefore have a wide degree of land and business interests within the district.

The Estate benefit from several allocations in the current draft version of the Local Plan. This representation is provided in support of these allocations, and also with their wider land interests in mind. The specific allocations as expressed in the plan currently, are:

- Land to the west of Combe Garden Centre (Gitti_04): 9.1ha of employment land
- Land to the west of Hayne Lane (Gitti_05): circa 100 dwellings
- Land adjacent to St Michaels Church (Honi_07): 30 dwellings

Our client is promoting sites for both employment and housing and 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. These follow on from the representations made to earlier drafts of the plan, notably the Issues and Options version, and the Call for Sites, in 2021.

Please note that this representation is supported by the following documents:

- This representation
- Copy of previous presentation to Strategic Planning Committee for Hayne Lane site
- Copy of previous presentation to Strategic Planning Committee for St Michael's Church site
- Land west of Hayne Lane submission material
 - Site location plan
 - Masterplan details – constraints and opportunities, west parcel, east parcel, combined parcel, context plan
 - Infrastructure Technical Note – Drainage and Highways
 - Ecological Constraints and Opportunities Report
- Land at St Michaels Church submission material
 - Site location plan
 - Masterplan details - Indicative masterplan site layout for 30 dwellings, constraints and opportunities plan

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. Combe Estate 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, where development will be supported.

It is logical for the West End to play an important role, given the area's proximity to Exeter, but the settlement hierarchy is correct to emphasise the potential for other settlements, such as Honiton, to accommodate growth district-wide.

The identification of Honiton as a Principle Centre is supported. The policy states that "significant growth" will be promoted and this is the correct approach for a location such as Honiton.

Honiton is an inherently sustainable location for growth and prosperity. There is a greater scope for both the main towns and villages to play in delivering growth for the district. Particularly those towns and villages which have excellent accessibility and access to rail infrastructure, such as Honiton. The Waterloo Line provides a mainline rail service from Exeter to London, linking to a number of towns and villages within the eastern part of the Greater Exeter area. The market town of Honiton has significant economic and housing potential for strategic expansion.

We would draw the LPA's attention to the work that was undertaken as part of the GESP (Great Exeter Strategic Plan) Draft Policies and Site Options Consultation (Regulation 18 stage) which highlighted Honiton as a potential strategic area for growth. Honiton was highlighted as a location for consideration in the GESP because:

- It is close to Honiton train station and both the A30 and A35
- Honiton is an important centre with good levels of employment provision as well as allocations to provide additional employment
- Schools in Honiton have scope for expansion

Noting the above, we would urge the LPA to continue to support the specific allocations that are proposed on Combe Estate land which are currently supported under Strategy 21, via the following references:

- Land to the West of Combe Garden Centre, Gittisham (Gitti_04) - The site is proposed for 9.1 ha of employment land and will form an extension to the existing Heathpark Industrial Estate.

- Land to the west of Hayne Lane (Gitti_05) --The western parts of the site will form a medium-scale residential development close to the existing urban edges of Honiton to accommodate around 100 new homes. The extent of the allocation is, however, still to be determined through further work in 2023. The Policies Map currently shows all of the site falling in the Settlement Boundary but the expectation is that this boundary line will be subject to refinement to ultimately include those (easterly) parts of the site that are determined to be appropriate for development and exclude those areas that are determined to not be appropriate for development.
- Land adjacent to St Michaels Church (Honi_07) - This land will form a small scale residential extension on the southern side of Honiton to accommodate around 30 new homes.

The town has an excellent range of facilities and is extremely accessible in terms of the available transport network. Whilst it does have AONB land surrounding the settlement, there are areas of development available without this constraint, and where AONB is designated care can be taken with scheme design to reduce any visual impact.

The scale and form of growth can be carefully controlled through local development management policies so that it complements the character of the area, however as one of the leading market towns in East Devon, Honiton should take a level of growth proportionate to its position in the settlement hierarchy.

Honiton can 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.

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.

2. Housing Distribution

2. Strategic Policy – Housing distribution

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 |
|-----------------------------------|---------------------|--------------|-----------------|--------------|-------------------|--------------|
| Western side | 841 | 1,800 | 7,250 | 0 | 7,250 | 9,891 |
| 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 |
| Principle and Main Centres | 691 | 1,559 | 1,712 | 1,515 | 3,227 | 5,477 |
| 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 |

In terms of the housing distribution figures we note the focus of development proposed around the western side of East Devon. Whilst there is obvious logic to this given the geographical relationship of this part of EDDC to Exeter and its associated services and facilities, we would suggest that the overall number of houses delivered here should be balanced against the rest of the district, particularly the main towns such as Honiton (and the main centres and villages).

For example, the North of Topsham allocation can make meaningful contributions toward housing, however we note through a search of land registry details that land ownership is extremely fragmented. The policy aspirations for this location suggest a need for a masterplan approach to deliver development in this location, but it is unclear if ownership issues have been taken into account. Paragraph 4.3 of the Local Plan confirms that, “To date detailed Assessment has not been undertaken of sites on the western edges of East Devon where close to the Exeter City Boundary. Assessment work will be undertaken in the coming months though in this plan we do show suggested allocations.” It is therefore unknown whether the levels of housing proposed can be accommodated in this location.

We raise this as around the towns and villages of East Devon there is clearly a role for landowners who own significant holdings in a single ownership to deliver meaningful contributions toward

housing delivery. Clearly the Combe Estate could assist with this, and we would suggest their site allocations should be upgraded to preferred sites.

The concept of 2nd choice sites is also unclear. Allocations are required to meet housing need figures and are either suitable or not.

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. This also suggests second choice sites, should be upgraded to preferred sites.

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.

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 delivered quickly and support housing delivery.

Paragraph 8 of the draft policy will set out the housing provision requirements for designated neighbourhood 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. We would ask officers to note that with regard to our client's Gitti_03 and Gitti_04 interests, this land falls within the parish of Gittisham. There is no Neighbourhood Plan covering this area. In addition the Honiton Neighbourhood Plan designated area follows the Parish boundary of Honiton and therefore excludes much of the western part of the built-up area of the town. This means that currently, many of the residents in the Heathfield area (including the Baker Estates development of circa 300 houses) would not be able to vote on a referendum for a neighbourhood plan that affects the town in which they live.

We raise this, as development in Honiton raises cross-boundary parish issues and therefore whilst neighbourhood plans have been prepared throughout the district, there is a need to ensure that the Local Plan leads the way by setting the housing numbers required for the district, reviewing the



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settlement hierarchy to ensure development is located appropriately, and where required amending settlement boundaries and allocating sites for development. It is then for neighbourhood plans to be updated to reflect the overarching content of the Local Plan.

4. Strategic Policy – Employment Provision and Distribution Strategy

Officers will note that our client owns draft allocation Gitti_04. This is an employment allocation which is currently proposed at the western end of the town. Gitti_04 immediately neighbours Gitti_03 which is land in the control of EDDC. As you know, both parcels of land currently form an allocation in the current local plan. Our client is extremely supportive of this allocation and their land is available for this development to come forward.

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 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. In this regard, Honiton is clearly a location where employment growth should be delivered. The profile of the town has been boosted by the District Council's relocation to their new offices and noting the town's excellent rail and road accessibility there is scope to deliver further employment, or at least retain the current employment designations which are part of this town.

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.

In terms of the location of development, the draft policy states that existing employment areas that will continue to be the primary locations for industrial, warehousing, offices, distribution development and other B Class Uses are identified on the Policies Map.

Whilst it is logical for existing employment areas to continue to be the primary locations for employment uses, the strategic policy must make sufficient provision for windfall employment development to come forward as opportunities present themselves and cannot be overly prescriptive.

Our client owns Combe Garden Centre, a very successful, established employment site. We would also ask officers to expand and set a definition for 'employment'. This should include for more than the traditional 'B' use classes and noting the flexibility that central government have introduced with the 'E' Class, there is scope to allow a wider range of uses in employment areas.

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



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needs to be made available across the district and it is logical for there to be a focus on future-proofing established employment locations.

5. Strategic Policy – Mixed Use developments incorporating housing, employment and community facilities

Strategy 5 currently states that for any development comprising of 100 homes or more specifically including at Tier 1 and 2 settlements, the LPA will require at least 0.4 hectares of employment land for each 100 homes proposed (with this ratio of provision applied on a pro-rata basis and applying for any homes numbering over 100);

At tier 3 and 4 settlements or development in the countryside whether on allocated sites or windfall sites the LPA will apply a threshold of 25 homes requiring at least 0.1 hectares of employment land for each 25 homes proposed (with this ratio of provision applied on a pro-rata basis and applying for any homes numbering over 25).

Planning permission will not be granted for residential development falling under the above unless certain criteria apply.

The concept of creating mixed and balanced neighbourhoods where residents can work and live in the same location is supported by our client. They are obviously the owners of Gitti_04 which is allocated for employment, and this allocation can provide meaningful employment opportunities to support the delivery of housing.

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.

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

21. Strategic Policy – Honiton and its future development

Our client currently has 3 sites allocated within Strategic Policy 21. These are:

- Land to the West of Combe Garden Centre, Gittisham (Gitti_04) - The site is proposed for 9.1 ha of employment land and will form an extension to the existing Heathpark Industrial Estate.
- Land to the west of Hayne Lane (Gitti_05) --The western parts of the site will form a medium-scale residential development close to the existing urban edges of Honiton to accommodate around 100 new homes. The extent of the allocation is, however, still to be determined through follow up work in 2023. The Policies Map currently shows all of the site falling in the Settlement Boundary but the expectation is that this boundary line will be subject to refinement to ultimately include those (easterly) parts of the site that are determined to be appropriate for development and exclude those areas that are determined to not be appropriate for development.
- Land adjacent to St Michaels Church (Honi_07) - This land will form a small-scale residential extension on the southern side of Honiton to accommodate around 30 new homes.

In the event that all preferred allocations and 2nd choice sites being consulted on were allocated this would lead to the following: Total new homes proposed for allocation at Honiton = 471 Total land area proposed for employment at Honiton = 14.6 hectares We are also, in addition, proposing the allocation of land within the existing Heathpark industrial estate as shown on the Policies Map (as referenced in our Employment Monitoring report) with references Plots 11A, 11B, 11D and 11M – these have a total area of around – 3.3 hectares.

Our client is clearly supportive of all of these allocations and the sites are available for development. The employment allocation currently forms part of the current Local Plan, and we would urge the LPA to re-allocate this site. We note further employment work is still pending and the focus of the Local Plan to date has been on housing strategy and distribution of housing development. Our client reserves the right to comment on further information as it becomes available, but ultimately, they are supportive of the allocation.

The two housing allocations which the LPA have given under Gitti_05 and Honi_07 are again supported. These are identified as second choice sites, but ultimately the sites are required to deliver housing numbers.

AT THIS POINT WE WOULD ASK OFFICERS TO CONSIDER THE ADDITIONAL INFORMATION SUBMITTED

WITH OUR REPRESENTATIONS WHICH CONFIRMS THE TECHNICAL DELIVRABILITY OF BOTH HOUSNG SITES. WE TRUST THIS INFORAMTION CAN ALLOW THE LPA TO SUPPORT BOTH SITES, AND MOVE THEM TO PREFERRED SITES. WE DISCUSS THE SUBMISSIONS BELOW:

AT THIS POINT WE WOULD REFER OFFICERS TO THE TECHNICAL INFORMATION THAT SUPPORTS THE POSITION

Land to the west of Hayne Lane (Gitti_05) – Allocation for around 100 homes

The text underpinning the allocation indicates that not all of the land currently located within the settlement boundary will be retained and it is envisaged that a scheme of 100 dwellings can be brought forward. The text also appears slightly contradictory as it suggests that land at both the western and eastern ends of the site can be brought forward – it confirms that further work will be undertaken during 2023 to confirm the extent of the allocation.

To assist officers, Combe Estate provide additional information to confirm the deliverability of the allocation as shown. The information submitted includes 3 development options:

- **Illustrative masterplan for the eastern end of the site (achieving circa 100 dwellings)**
 - The site equates to 2.74ha
 - All hedgerows retained with ecology buffers retained as required
 - pond at entrance area to site adapted to deliver BNG and assist with provision of new attenuation basin
 - opportunity for spine road to continue to the west to connect to western access option area
 - Communal open spaces and play areas can be provided.
 - Attractive frontage to AONB introducing an appropriate character
 - Strong back to back relationship with existing development to the north (the existing Baker Estates scheme)

- **Illustrative masterplan for the western end of the site (achieving circa 200 dwellings – 105 + 89 in separate parcels)**
 - The site equates to 3.23ha and 2.82ha
 - Access can be provided via a dedicated route which Baker Estates are legally required to provide as part of their development of their existing Hayne Lane site – the route of this (which is set out on a legal transfer plan) is annotated on the layout provided
 - Density is deliberately reduced to the west to provide an appropriate edge of settlement response.
 - Frontage to Open Space and retained hedgerows where possible

- Hedgerows retained with ecology buffers including assumed bat flight path along central north/south hedgerow
- **Illustrative masterplan for a combined parcel (achieving circa 300 dwellings)**
 - The layout combines the features shown on both the eastern and western parcels

The current layout has been informed by the following technical information:

- Ecological constraints and opportunities plan (produced by GE Consulting)
- Drainage Strategy (produced by AWP)
- Access Strategy (produced by AWPP)

We believe the LPA could allocate any of the three options set out, and we would ask officers to note that whilst the current settlement boundary as drawn includes land within the AONB, all development shown in the layouts provided is **entirely outside of the AONB**.

We would also ask members to note that the estate has further land within its control that could be used for the other potential benefits, including the delivery of biodiversity net gain which will become a legislative requirement in due course and will no doubt be a key part of the LPA's Local Plan.

The Estate also has a track record of delivery – an allocation in this location would in pure delivery terms be a sensible choice. For example, many of the utilities required for housing development are largely in place due to the current housing development being built out by Baker Estates, which proposes a residential development for 291 houses. That scheme was originally approved under outline planning application 13/2744/MOUT, and the committee report that approved 291 houses on part of the Gitti_01 land considered **access to services and sustainability** – and the committee report for this approval specifically states:

The site lies outside the existing built-up area boundary approximately 1,900 metres (1.2 miles) from the town centre of Honiton, approximately 745 metres (0.46 miles) from the nearest supermarket and 123 metres (0.07 miles) from the nearest employment area, 200 metres (0.08 miles) from the nearest bus stop, 1,600 (1 mile) to the nearest primary school and 2,100 metres (1.3 miles) to the nearest secondary school. Therefore, it can reasonably be concluded that the site lies in a sustainable location close to essential services and infrastructure and sole reliance on the private motor vehicle would not be required for occupants of the development to access these services.

This land fundamentally has the same accessibility credentials with good proximity to retail and employment opportunities, and public transport connections that are well-established at this end of the town for everyday services and needs. Bus services available within a walk of the site and rail services within a 40 minute walk or 12 minutes' cycle (approx. 3km) from the centre of the site.

Our submitted evidence confirms that key employment, food retail and transport facilities are available within 800m/10 mins walk of the site, creating a 'walkable neighbourhood' as defined by Manual for Streets as shown through the accessibility plan. Again this demonstrates the accessibility of the location.

Pedestrian access to the development would be facilitated by:

- A new footway along Hayne Lane to connect to the existing footway to the north;
- A new active travel link into the Baker Estates Hayne Lane Development, and onto the connection through to Old Elm Close; and
- The potential for a number of connections under the railway line, subject to approval by Network Rail, to improve permeability between the northern and south development parcels.

Vehicular access would be facilitated by:

- a realignment of the existing Hayne Lane and a new access through and around Hayne Farm, and
- through a strip of land safeguarded as part of the Baker Estates development, who have a legal obligation which to facilitate development through their site for future expansion.

The opportunity for delivery of two access locations, with a loop road connection, provides an appropriate standard vehicular access to serve in excess of 300 dwellings or less. Similarly individual developments of circa 100 (eastern end) and 200 (western end) dwellings could be delivered.

We trust officers will continue to support Gitti_05's inclusion as an allocation for housing development in the local plan. As per the approval of the 2013 outline application for the 291 dwelling scheme – this is an accessible location. There are key facilities in close proximity to the site – there is key employment at Heath Park, both through the Council and other employers, access to a diversified retail offer, a strong food retail offer, and also access to public transport.

- **Land adjacent to St Michaels Church (Honi_07) – Allocation for around 30 new homes.**

The site is allocated for 30 homes and additional design work is submitted with this representation to show that an appropriate form of development can be accommodated on site. Honi_07 should be reconsidered as a small/medium sized housing site (such sites will need to form 10% of the district's overall supply). This site is a 2nd choice site, in the current version of the plan, but given the ability to deliver the site immediately, the site should be considered a preferred option. The site has a number of merits that weigh in favour of its inclusion:

- In addition to the delivery of housing, the proposals have the ability to offer up amenity areas, including a local play area and associated green infrastructure.
- The layout as shown takes account of the proximity of the neighbouring grade II* listed church by providing open space next to the boundary of the site to preserve the setting of this building. This will be used as a local play area.
- Ecological buffer planting is also proposed around the perimeter of the site along with the retention of all mature planting and hedgerow.
- Vehicular access is proposed to the north of the site and pedestrian access is also shown to the southwest of the site – this would deliver access to tie in with the existing pavement adjacent to Wetherill Road. Connectivity can therefore be provided to the bus services which travel along this thoroughfare.
- We would ask officers to note that the land in question can be made IMMEDIATELY AVAILABLE for residential development and a range of much needed housing types can be delivered as part of any proposed scheme.
- The site is highly accessible being within 800m walking distance of the High Street, 400m of the train station and 275m of the hospital.

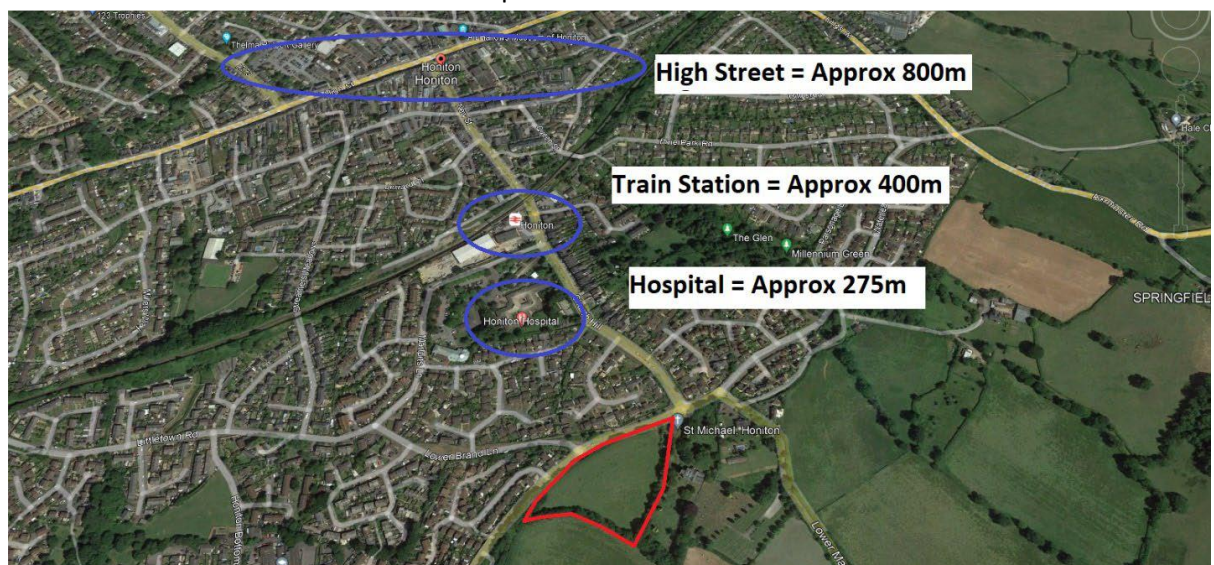


Figure 1 - distance from site to local facilities

- Whilst the site is in the AONB, it is very well contained in landscape terms with mature structural planting located around the perimeter of the site, and views into the site are limited. The site is located centrally in relation to the town and its facilities and is a sensible location for further development as recognised through the draft local plan.
- One of the many benefits of this scheme is that it is enclosed on its southern side by dwellings and the site offers self-containment, and all the boundary features will be retained. In visual terms the proposal would be read in conjunction, and as part of, the existing settlement.
- The proposal would be designed to a high standard and would enable a high standard of amenity with gardens and parking provided for all dwellings. They would be designed to allow good standards of light and space standards for the living areas and large gardens and designed to not overlook neighbouring gardens.
- The proposal could provide a policy compliant level of affordable housing (subject to viability considerations) and it is envisaged that this would be delivered at 25%. This proposal is therefore an ideal opportunity to provide significant number of a range of housing types for families within the town and this affordable housing offer weighs heavily in favour of the scheme.
- All the dwellings would be located within flood zone 1 and the proposals would not give rise to any flood risk concerns. The land to the north of the site could also be utilised as part of any scheme and be used to dispose of surface water and incorporated as a SUDS feature within any development and further soakaway testing can be undertaken to inform this position.

We trust that officers will continue to recognise the suitability of the site for allocation and make this site a preferred choice.

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.

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.