

SUGGESTED MODIFICATIONS TO THE PRE-SUBMISSION TEWKESBURY LOCAL PLAN

Following on from the note which we sent on 18th March 2021 regarding the need for flexibility within the Tewkesbury Local Plan, specifically relating to Policy **EMP4** of the Pre-Submission Tewkesbury Local Plan.

Within our note we point out that whilst we appreciate the fundamental importance of control to allow and maintain sustainable growth whilst considering settlement character and size, there could be more flexibility within policy EMP4 in order to align the local policies with the national level guidance, with specific regard to paragraph 80 which emphasises the need 'to support economic growth and productivity, in order to enable businesses to capitalise on their performance potential'.

I have suggested some text in green to be added to the policy.

EMP4 policy and states:

Within the wider rural area, outside of allocated employment sites or settlement boundaries, proposals for new employment development will be supported in principle where they:

- 1. involve appropriate agricultural development or diversification in accordance with Policies AGR1 and AGR2;*
- or*
- 2. involve the appropriate conversion of a rural building; or*
- 3. involve the redevelopment or expansion of established employment land or an existing business occupying the site; or*
- 4. there are specific reasons why a rural location is necessary.*
- 5. are small in scale and able to meet the following criteria;*
 - are justified by a business case, demonstrating that the business is viable and the requirement for new premises;*
 - facilitate the retention or expansion of an existing business; and*
 - evidence is provided demonstrating why the development needs to be in the proposed location.*

In all cases the scale and nature of the proposal should respect the rural character of the area and will be required to satisfy the criteria at Policy EMP5'.

We hope that the small modifications to the wording will provide assistance and allow for more flexibility within the existing policies which in turn will allow for them to more accurately align with other local plans and national level guidance.

TBC RESPONSE: Consideration has been given to the suggested modifications put forward by Ridge and Partners LLP (on behalf of various clients). TBC considers however that there is already sufficient flexibility within the policies for employment development within the PSTBP. Policies EMP1 and EMP2 both allow for the expansion of the Major Employment Sites and Rural Business Centres (subject to Policy EMP5), so there is potential for additional employment development at these locations should there be insufficient capacity within the allocated sites to meet the needs of a particular business. Furthermore, Policy EMP4 allows for the new employment development in other rural locations where (inter alia) it would involve the redevelopment or expansion of established employment land or an existing business occupying the site, and also where there are specific reasons why a rural location is necessary. The reasoned justification to Policy EMP4 (para 4.22) recognises that there may be a wide range of circumstances as to why a rural location is necessary for a new employment development, including where there is no existing suitable employment land on which to locate, and requires proposals to set out their justification as to why

the rural location is necessary as opposed to existing employment sites or settlements. It also states that proposals are only likely to be supported under this part of the policy where they relate to the specific needs of an established business rather than speculative development proposals where no end user is identified. It is therefore considered that the suggestions put forward by Ridge do not add anything to Policy EMP4.