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**TEWKESBURY BOROUGH LOCAL PLAN
EXAMINATION (REGULATION 22):
RESPONSE TO MATTER 5 OF THE
INSPECTOR'S LIST OF MATTERS,
ISSUES AND QUESTIONS.**

**FOR RUDGEWAY FARMS LTD.
RICHARD HARVEY AND CAROLINE
HORNE; THE SPIRES FAMILY
PARTNERSHIP; AND
BLOOR HOMES WESTERN**

January 2021

TEWKESBURY BOROUGH LOCAL PLAN EXAMINATION (REGULATION 22): RESPONSE TO MATTER 5 OF THE INSPECTOR'S LIST OF MATTERS, ISSUES AND QUESTIONS.

January 2021

Prepared for

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1. INTRODUCTION

- 1.1. This representation has been made by Ridge and Partners LLP on behalf of Rudgeway Farms Ltd. Richard Harvey and Caroline Horne; The Spires Family Partnership; and Bloor Homes Western to answer the matters, issues and questions set out by the Inspector in relation to the Tewkesbury Borough Local Plan (TBLP) Examination which was submitted to the Secretary of State on 18th May 2020 under Regulation 22(3) of the Town and County Planning (Local Planning) (England) Regulations 2012.
- 1.2. Our clients continue to promote Land to the South of Wheatpieces, Tewkesbury through the emerging TBLP, having submitted representations for its suitability and availability to deliver circa. 350 dwellings and approximately 1,800 sq. metres of B1 use (offices) during the Regulation 19 Pre-submission Consultation.
- 1.3. Specifically, this representation seeks to address “Matter 5: Employment land and Policies, including Gloucestershire Airport”, answering question 5.16 which states *“Are the general employment policies EMP3 – EMP6 in the plan positively prepared, justified, effective, consistent with national policy and the JCS?”*
- 1.4. As this question is not site specific, Land to the South of Wheatpieces is not referred to in detail, however, the answers contained within this representation support the requirement and delivery of additional sites such as Land to the South of Wheatpieces to come forward to support the employment supply within the Borough and moreover the wider JCS area, and ensure consistency is achieved between the emerging TBLP and the adopted JCS.

2. MATTER 5: EMPLOYMENT LAND AND POLICIES, INCLUDING GLOUCESTERSHIRE AIRPORT

2.1 The following section relates to “Matter 5: Employment land and policies, including Gloucestershire Airport” where the Inspector raises the issue of:

“Whether the TBP provides for the quantity and distribution of employment land as required by the strategic policies of the JCS, whether the employment allocations identified in the TBP are justified, and whether the general employment policies in the plan are positively prepared, justified, effective and consistent with national policy and the JCS. In addition, in the case of the Staverton/Gloucestershire Airport Business Parks, whether exceptional circumstances have been demonstrated to justify deleting land from the Green Belt.”

2.2 Specifically, the following section will seek to answer question 5.16 which asks, *“are the general employment policies EMP3 – EMP6 in the plan positively prepared, justified, effective, consistent with national policy and the JCS?”*

2.3 Policy EMP3 supports the principle of employment development only within settlement boundaries (excluding allocated sites). Outside settlement boundaries, Policy EMP4 is only supportive of employment development where it meets one of the following criteria:

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.”*

2.4 It is our opinion that emerging Policy EMP3 and EMP4 are not consistent with either national policy, or the JCS as the policies do not make allowance for employment development on sites that are outside but well-related to existing settlements. This is in direct contrast to the more supportive employment policies of the JCS, specifically Policy SD1 part vi. which supports employment development in the wider countryside where it is *“located within or adjacent to a settlement or existing employment area and of an appropriate scale and character.”*

2.5 Furthermore, a key aim of the National Planning Policy Framework (NPPF) is to support economic growth and productivity. Paragraph 80 states that *“planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local*

business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”

- 2.6 Paragraph 83 also supports the sustainable growth and expansion of all types of business in rural areas through well-designed new buildings. Further, Paragraph 84 requires planning policies to 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 not well served by public transport. In these circumstances, it requires development to be sensitive to its surroundings, to not have an unacceptable impact on local roads and exploit opportunities to make a location more sustainable. Additional support is given to sites that are well-related to existing settlements.
- 2.7 Therefore, it is our opinion that Policies EMP3 and EMP4 are not consistent with the adopted development plan policies contained in the JCS, nor with national planning policy which are more supportive of economic growth in locations that are outside, but well-related to existing settlements. This demonstrates that the emerging LP in its current form has not been prepared positively, failing to comply with Paragraph 16 of the NPPF.
- 2.8 Aside from the general emerging employment policies not being consistent with the JCS and the NPPF, further flexibility should be provided within the emerging LP to allow for employment sites to come forward to assist the Council in achieving a sufficient employment supply for not only the Borough but the wider JCS area.
- 2.9 It is noted through the examination of the Cheltenham Local Plan (adopted July 2020) that Cheltenham Borough delivered a limited employment supply on sites outside those that were already allocated within the JCS, thereby putting a strain on the remaining local authority areas, particularly Tewkesbury Borough to deliver the remaining employment land requirements of the JCS.
- 2.10 The JCS under Policy SP2 requires at least 192 hectares of B-class employment to come forward across all three Districts. Through allocating major employment sites (Policy EMP1) and rural business centres (Policy EMP2), the TBLP allocates approximately 46 hectares of employment land. However, given that the JCS expects the largest number of new employment sites to come forward within the Tewkesbury Borough, the TBLP should also seek to provide flexibility in delivering further employment sites to ensure the needs as set out in the JCS can be met over the plan period.
- 2.11 Overall, it is therefore suggested that emerging Policies EMP3 and EMP4 of the TBLP are reviewed so they reflect Policy SD1 of the JCS and Paragraphs 83 and 84 of the NPPF, providing a more supportive environment for future employment development to come forward that may be outside, but well-related to existing settlements. This will ensure the plan is prepared positively, and in accordance with the JCS and NPPF, in line with the requirements of Paragraphs 16 and 35 of the NPPF.

3. CONCLUSIONS

- 3.1 This representation has been made by Ridge and Partners LLP on behalf of Rudgey Farms Ltd. Richard Harvey and Caroline Horne; The Spires Family Partnership; and Bloor Homes Western to address "Matter 5: Employment land and Policies, including Gloucestershire Airport", answering question 5.16 which states "*Are the general employment policies EMP3 – EMP6 in the plan positively prepared, justified, effective, consistent with national policy and the JCS?*". This representation relates to the Tewkesbury Borough Local Plan Examination which was submitted to the Secretary of State on 18th May 2020 under Regulation 22(3) of the Town and County Planning (Local Planning) (England) Regulations 2012.
- 3.2 The above has demonstrated that the general employment policies contained within the emerging local plan, specifically Policies EM3 and EM4, are not consistent with the JCS nor the NPPF as they do not allow for unallocated employment sites outside settlement boundaries to come forward for development unless there are linked to agricultural development or a farm diversification scheme, involve the conversion of a rural building, involve the redevelopment or expansion of established employment land or an existing business occupying the site, or it has been justified that there rural location is necessary. These policy requirements differ from the requirements of Policy SD1 of the JCS and Paragraphs 80, 83 and 84 of the NPPF which allow for employment development within the wider countryside that is located within or adjacent to a settlement and that is of an appropriate scale and character.
- 3.3 Therefore, the emerging plan has not been positively prepared to accord with Paragraph 16 of the NPPF.
- 3.4 Moreover, given the requirements of the JCS we consider the employment policies within the emerging LP should adopt a more flexible approach as suggested above to allow for the Council to achieve a sufficient employment supply for not only the Borough but the wider JCS area. This would allow for the plan to be positively prepared, complying with Paragraph 16 of the NPPF.
- 3.5 We respectfully request the above is given due consideration during the examination of the LP.

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