

Tinsley (Branston) Farms Limited Central Lincolnshire Local Plan Independent Examination



Statement in response to Matter 2- Housing,
Employment and Retail Need. Issue 5 – Employment
Land Requirement – Policy S28

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town planning



landscape architecture



architecture

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1. INTRODUCTION

- 1.1. Today we are representing Tinsley (Branston) Farms Limited (“Tinsley Farms”), a major landowner to the south east of Lincoln.
- 1.2. Tinsley Farms has promoted a successful business/industrial development at Kirks Yard, Branston. The first phase of development, for 14 units, was subject to planning approval 15/0754/FUL and proved so successful a further development of 10 units was approved in June 2022 (15/0754/FUL). The site fulfils a need for units for start-up businesses and sole traders. The site was considered through the HELAA under reference NK/BRAN/004.
- 1.3. The experience of promoting the development provides a useful insight into the market for small business units, which does not appear to be reflected adequately in the Submission Draft Local Plan.

2. THE INSPECTORS’ QUESTIONS

- 2.1. The questions to which Tinsley Farms will respond are:

- 2.2. **Matter 8 – Meeting Housing Needs**

Issue 5 – Employment Land Requirement – Policy S28

- Q1. What is the need for employment land over the plan period and is this adequately set out in the Plan?
- Q2. The PPG advises that strategic policy making authorities will need to develop an idea of future needs based on a range of data which is current and robust, such as labour demand, labour supply, past take-up of employment land and consultation with relevant organisations. How have these factors been taken into account in determining future demand for employment space in Central Lincolnshire?
- Q4. The Committee’s response to the Inspectors’ Initial Questions states that there is approximately 100 hectares of land on Strategic Employment Sites yet to be developed, with around 90 hectares benefitting from planning permission. How does the committed supply of employment land relate to the identified need? ie. – does the scale, type and location of approved employment space match the anticipated requirements for land going forward?

- Q5. Is the Local Plan justified in seeking to allocate significantly more employment land?

Issue 5 – Local Employment Areas - Policy S32

- Q1. Local Employment Areas (LEA) are defined as sites sized 0.5ha or more, at least 2,500sqm of existing floor space and with 3 or more units occupied by separate businesses, within Tiers 1-6 of the Settlement Hierarchy as defined in Policy S1. How was this definition derived and is it justified?

Central Lincolnshire Local Plan Review – Matters, Issues and Questions

- Q1. Is Policy S32 sufficiently clear as to whether a piece of land is a Local Employment Area or not? Should these sites be listed in order for it to be effective?

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Issue 7 – Employment Proposals in the Countryside – Policy S34

- Q1. Policy S34 limits proposals for employment generating development in the countryside to the expansion of an existing employment use and development proposals that support the growth of the agri-food sector or other land-based rural businesses and buildings. What is the justification for this approach? How would a development proposal for other employment uses in the countryside such as minerals extraction be dealt with?
- Q2. Is Policy S34 consistent with paragraph 84 of the Framework, which states that planning policies should enable the sustainable growth and expansion of all types of businesses in rural areas, both through conversion of existing buildings and well-designed new buildings?

3. RESPONSE TO QUESTIONS

- 3.1. Tinsley Farms has promoted a successful business development, but the company is not a major developer of business units. The company has views on the approach based on their experience of delivering the Kirks Yard Development, but are not in a position to provide detailed answers to all the questions.
- 3.2. The Local Plan, and the evidence upon which it is based, appears to concentrate on strategic levels of demand and large scale industries. This is clearly an essential part of the economic strategy for the area, and we would not wish to challenge those findings. There is a need, however, for the Local Plan to address the needs for smaller businesses serving local communities across the plan area. The demand for such uses does not appear to have been quantified or considered in any detail. Such businesses, however, will support small businesses created locally, which may serve either a local market, providing services to local residents or businesses; or, equally, may serve a more national or international business. They are essential for ensuring the local economy is robust and better placed to respond to changes in the economy.
- 3.3. Similarly the level of analysis and promotion of smaller sites appears to have been missed out of the Local Plan. Some provision is made to support rural industries and local employment sites, but it is not clear whether sites such as Kirks Yard, either when considered with Branston, or by itself, is considered to be a local employment area or a rural business. It is possible that businesses that support the larger Branston food processing plant may be housed at Kirks Yard.
- 3.4. Whilst Kirks Yard is beyond the village edge of Branston, it is closely associated with the village and is readily accessible to Branston, as well as Waddington, Bracebridge Heath, etc, and can be considered to be a sustainable location. Despite the popularity and success of Kirks Yard, it is unlikely a new employment development of this nature would come forward elsewhere in Branston or nearby settlements, where the demand for residential development is likely to price employment uses out of the market.

- 3.5. The Local Plan policy and strategy for Employment Development is failing to support the provision of small business units, such as those found at Kirks Yard.
- 3.6. We enclose the representations made to the Regulation 19 Consultation. which will provide some more information. It is not clear, however, whether the Joint Committee has considered the wider issues raised regarding the needs for small business units to support local communities.

Proposed Submission Response Form

PLEASE USE BLACK INK TO COMPLETE THIS FORM
Please refer to the 'Guidance notes on completing the Representation Form'

From 16 March to 9 May 2022 you can make representations on the soundness and legal compliance of the Proposed Submission Local Plan. All comments must be received by 11:59pm on 9 May 2022. Responses made at this stage will be treated as formal representations and considered by an independent Planning Inspector; late submissions are unlikely to be considered by the Inspector.

Where possible we prefer people to use the online consultation system.

You can access the Plan online via <https://www.n-kesteven.gov.uk/central-lincolnshire/local-plan-review/> or via <https://central-lincs.inconsult.uk/CLLP.Proposed.Submission./consultationHome>. However, if you cannot use the online system, then your views can be made by email or through the post, preferably using this form.

PART A: YOUR DETAILS

Important information about data protection:

Any comments you make as part of the consultations into the Central Lincolnshire Local Plan will be made public as it is a statutory requirement to publish comments. We will publish these online. If you have any concerns then please contact us. The Councils will however remove personal email addresses, postal addresses, telephone numbers and signatures. Your information will be retained by the Councils as part of our statutory plan making duty, until no later than six months after the Plan is adopted, at which point your information will be securely deleted / destroyed. We will consult you at subsequent stages of the Plan's preparation to seek further comments from you and to keep you informed. If you do not wish to be contacted at subsequent stages of the Plan, please let us know using the contact details at the top of this page. **By submitting this form you are agreeing to these conditions.**

Name:	Agent (if applicable): Robert Doughty Consultancy Limited	
Organisation (if applicable) : Tinsley (Branston) Farms Ltd	Name: Mr Michael Braithwaite	
Address: c/o Robert Doughty Consultancy Limited	Address: 32 High Street Helpringham Sleaford Lincolnshire	
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Email:	Email: planning@rdc-landplan.co.uk	
Tel:	Tel: [REDACTED]	
Signature: [REDACTED]	Date: 09/05/2022	

We will send all correspondence by email if you provide us with your email address. If Agent details are provided, we will send all correspondence to them.

Do you wish to be notified of any of the following? (Please tick as appropriate)

The Submission of the Local Plan for independent examination:
The Publication of the Inspector's Report:
The Adoption of the Local Plan:

x
x
x

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. **After this stage, further submissions**

THANK YOU FOR TAKING TIME TO RESPOND

Please email forms to: talkplanning@central-lincs.org.uk

Or post to: Central Lincolnshire Local Plan Team, District Council Offices, Kesteven Street, Sleaford, NG34 7EF

will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

PART B: QUESTIONS

ONE FORM SHOULD BE COMPLETED FOR EACH REPRESENTATION

Q1. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Paragraph	Section 5 of the Local Plan	Policy	Policies 28 to 34	Policies Map		SA	
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Q2. Do you consider the following to be legally compliant?

Local Plan	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't know <input type="checkbox"/>
Sustainability Appraisal (SA)	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input checked="" type="checkbox"/>

Q3. Do you consider the Local Plan is:

Positively Prepared	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't know <input type="checkbox"/>
Justified	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't know <input type="checkbox"/>
Effective	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't know <input type="checkbox"/>
Consistent with national policy	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't know <input type="checkbox"/>
In compliance with the Duty to Co-Operate	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input checked="" type="checkbox"/>

Q4. If you answered 'No' to question 2 or 3 above, please give details below. Please be as precise as possible and follow guidance in our note 'Guidance notes on completing the Representation Form'. If you answered 'yes' or 'don't know', you can also use this box to set out details of your representation on the Local Plan or SA.

The economy section does not reflect the demand for economic demand in the Plan Area. The Economic Needs Assessment (ENA) prepared to support the Local Plan confirms that the number of jobs created in the area always exceeds the number predicted by the two respected prediction models (Experian and Oxford Economics) Although the ENA increases the job creation targets to reflect past trends, rather than rely on the projections, no attempt has been made to explore the reasons for this rapid jobs growth. Is it informed by the concentration of defence jobs (both in the armed services and related civilian roles) or the impact of investment in Agri food? Alternatively, are new jobs investment by major engineering companies such as Siemens, responding in part to investment in renewable energy generation? Or is the growth of the University of Lincoln the driver to job creation? Or is it based on jobs to support the growing population and the increase in Households – perhaps described in the past as the butcher, the baker, the candlestick maker, but today's equivalent being the telecoms engineer, the gas fitter, the car mechanic, the childcare professional or the dogwalker as well?

Without knowing what is driving the creation of new jobs, how is it possible to plan for delivering those new jobs?

This approach is inconsistent with national policy, specifically paragraph 8 of the NPPF, which requires plans to provide sufficient land of the right type in the right place and at the right time to support growth, innovation and improved productivity.

Many of the jobs created in recent years may not necessarily fit within the standard use classes of B1, B2 and B8 (Now B2, B8 and E(g)) although Chapter 5 of the Local Plan, and the supporting analysis and policies, appears to be based on the limited use classes order. Many employment areas, whether identified in the local plan or not, accommodate other uses (soft play zones, car mechanics, IT services, parcel couriers, etc.). When small units for rent are provided, either by the public or private sector, they generally have tenants by the time they are open and run at high occupation rates, whether the business serves a national or local market.

The policy concentrates on "strategic" economic development sectors identified the industrial strategy, with growth focused on strategic allocations located in the main settlements. This does not appear to reflect more localized issues affecting the economy of Central Lincolnshire, such as the growth of the University of Lincoln, defence or the growth in small businesses created to meet the daily needs of the local community (whether this is professional services, education or care) Nor does it address the demands of agri-food, with past investment in locations such as "Branston", resulting in job creation spread across the whole area, including in rural areas. The draft Local Plan, however, focuses on large allocations in the main settlements, despite the evidence of significant job creation in other locations in addition to the strategic development sites. This approach is taken despite evidence in

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the ENA that jobs growth has been delivered across the rural area and are not focused purely in the main settlements.

The approach in the plan is inconsistent with national policy in the NPPF, paragraph 82 of which requires planning policies to “positively and proactively” encourage sustainable economic growth and to set criteria and identify strategic sites for local and inward investment to meet needs anticipated over the plan period.

The plan does not positively respond to the evidenced demand, either in terms of type of job or geographic location of new allocations.

In addition to the main elements of economic growth outlined above the plan is inconsistent with paragraph 79 of the NPPF which requires planning policies to identify opportunities for villages to grow and thrive, especially where this will support local services. Concentrating economic growth in large towns will undermine investment in the range of smaller communities and settlements across the more rural areas.

The failure to address specific needs of various economic sectors, including agri-food, engineering (including maintaining renewable energy installations), defence, Higher education and small businesses means the draft Local Plan is unjustified and does not make appropriate provision to support the demand for new jobs in appropriate locations.

Our client promoted the “Kirks Yard” development of small rental business units for development adjacent to the “Branston” agri-food plant on Mere Road, Branston. The “Branston” plant is a longstanding development that continues to benefit from investment to respond to changing circumstances. It is symbolic of other developments of this type across the Central Lincolnshire area. Although the business units are a recent development, they have been hugely popular meeting a growing demand for units of this nature across Central Lincolnshire (other sites, such as Churchill Business Park, Bracebridge Heath, and Sleaford Railway Station, both provided and managed for North Kesteven District Council, also demonstrate the need for such units). The “Branston” plant is a well-established employment area.

The surrounding land is occupied by a solar farm installed in late 2021. Areas like this should be identified in the plan and a positive approach taken to their future. Although investment in “Branston” would be reluctantly supported by policy S34, development to support the maintenance of renewable energy installations and smaller businesses is lacking. Support for the type of facility provided by Branston and Kirks Yard should be positively promoted in the Local Plan to support the growth of the local economy.

(Continue on a separate sheet if necessary)

Q5. If you answered ‘No’ to question 2 or 3 above, please set out what change(s) you consider necessary, and why, to make the Local Plan or SA legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text. Please be as precise as possible.

The economic strategy for the draft Local Plan should be revisited to ensure that the policies and proposals support the economic investment focused in the area, including the growth of the University of Lincoln, investment in defence, growth of agri-food and renewable energy generation, together with the more dispersed demand for smaller businesses that meet the daily needs of the wider population, whether based in main towns or smaller settlements.

The draft Local Plan should be amended to identify key existing employment sites. The draft plan identifies significantly fewer existing sites than the adopted plan.

(Continue on a separate sheet if necessary)

Q6. It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination. As such, do you consider it necessary to participate at the oral part of the examination?

☐ **No** I do not wish to participate at the oral examination

☒ **Yes** I do wish to participate at the oral examination

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