

### **Introduction and Background**

The following representations are made on behalf of FMB Projects Ltd (*FMB*), being the owner of a substantial part of *Gidley's Meadow Business Park (Gidley's Meadow)* in Christow. FMB is in contract to acquire the remainder of the business park from Stephen Clark who has developed *Gidley's Meadow* over the past 30 years.

*Gidley's Meadow* is a small business park located on the eastern side of the village, on the opposite side of the road to the community hall and grounds. The park consists of eight buildings, divided into 12 letting units and occupied by local businesses including Black Tor Brewery, Sweet Sensations, C P Sheds and Green Ecology (an environmental consultancy business). Our client also has an office on the business park.

FMB is a small private company owned by Mr and Mrs David Gunn – a couple with strong local connections, having lived in Christow for 20 years and now living in a neighbouring village. They have a vision to gradually improve and future-proof the site by maintaining and improving the buildings and associated infrastructure and by diversifying the range of uses that can occupy the existing buildings (there are no plans to expand the site). This would provide additional services and facilities for the village, which would complement the existing uses, at a time when community facilities are decreasing in number and development opportunities are limited.

It is considered that including *Gidley's Meadow Business Park* within the settlement boundary for Christow and supporting a wider range of complementary uses at the Park would align with the Authority's strategic objectives for Dartmoor to make settlements more sustainable and self-sufficient and help the Authority to meet its overarching duty to foster the economic and social well-being of the local communities within the National Park.

**Strategic Policy 1.2(2) Sustainable Development in Dartmoor National Park**

This draft policy explains that all development in Dartmoor National Park must be sustainable. This means that development must, for example, take place where it minimises the need to travel, make efficient use of land and infrastructure, in particular by prioritising the use of previously developed land and buildings, and support the economic vitality of the National Park.

Observations on Draft Policy

Our client remains supportive of the overall strategy for development to meet the needs of Dartmoor's communities and maximise the use of brownfield land and existing buildings and is generally supportive of Strategic Policy 1.2(1), particularly criteria b, d and m relating to:

- minimising the need to travel,
- prioritising the use of previously developed land and buildings, and
- supporting the economic vitality of the National Park.

In order for the Local Plan to be sound it must be positively prepared i.e. the subsequent strategic and development management policies within the Plan for different development types and Dartmoor's towns and villages must be flexible enough to enable the strategic policies and overall objectives to be met and not unduly prevent sustainable development (which has regard to the National Park's duty to seek to foster the economic and social well-being of the local communities) from taking place.

### **Strategic Policy 1.4(2) Spatial Strategy**

This draft policy sets out the spatial principles for development within Dartmoor National Park. It proposes a second tier category of settlement (to be known as *Rural Settlements*) where there would be greater opportunities than envisaged in the current development plan for growth to address local needs. Settlement boundaries are proposed for the Rural Settlements.

Christow is identified as a Rural Settlement.

#### Observations on Draft Policy

Our client remains supportive of the inclusion of the Rural Settlement category, where development intended to meet the needs of the settlement and its parish will be acceptable in principle, and Christow's inclusion within this category. Particular support is given to the priorities *'to maintain employment sites and give opportunities for new or improved employment sites where appropriate opportunities exist'* and *'to maintain or enhance a range of services and facilities which serve the settlement'* (criteria b and c respectively). This is a positive approach that is consistent with achieving sustainable development, is justified as an appropriate strategy for this settlement and is consistent with national policy, as it will enable the delivery of sustainable development.

We note that Gidley's Meadow is shown as falling within the proposed settlement boundary for Christow (Map 7.15) and **STRONGLY SUPPORT** this proposal (please also see our comments on Policy 7.1(2) Settlement Boundaries and Development Sites). This approach is justified i.e. an appropriate strategy in light of the key principles on which settlement boundaries are based (as set out in paragraph 7.1.5). Paragraph 7.1.5 explains that settlement boundaries are drawn tightly around the built form of the settlement, including any land with planning permission, and normally include a number of land uses, including employment uses. This approach is also consistent with national policy, as it will enable the delivery of sustainable development, and has been positively prepared, therefore meeting the tests of soundness.

This links to paragraphs 1.6.6 and 1.8.1, which stress the importance of using what little development land is available to best effect and strongly encourage the reuse of previously developed land to best effect in recognition of the scarcity of development land in Dartmoor. Diversifying the range of employment generating uses that can occupy the existing buildings at Gidley's Meadow would provide additional services and facilities for Christow, which would complement the existing uses, at a time when facilities and services are decreasing in number and development opportunities are limited.

### **Strategic Policy 4.1(2) Supporting Community Services and Facilities**

This draft policy is generally supportive of community services and facilities within Dartmoor National Park. Part 3 states that within or adjoining classified settlements the provision of new or extended community facilities will be supported.

#### Observations on Draft Policy

Our client remains supportive of the strategy to support the needs of Dartmoor's communities through the provision of new services and facilities and agrees with paragraph 4.1.2 that the vitality and well-being of Dartmoor's communities is reliant upon local services and facilities which meet their day-to-day needs.

Our client **SUPPORTS** Part 3 of Draft Policy 4.1(2), which states that '*within or adjoining classified settlements provision of new or extended community facilities will be supported.*' This will increase the chances for existing communities to secure the services they require to make them more self-sufficient and enhance their vitality, especially those with very little scope to accommodate such services and facilities within the settlement boundary. This approach meets the tests of soundness by being positively prepared (consistent with achieving sustainable development), justified (an appropriate strategy for sites within or adjoining identified settlements in order to make settlements more sustainable and self-sufficient) and consistent with national policy (by enabling the delivery of sustainable development).

### **Strategic Policy 5.1(2) Non-Residential Business and Tourism Development**

This draft policy supports non-residential business and tourism development within or adjoining local centres and rural settlements.

Part 4 states that existing business and employment sites and premises will be retained for economic uses and proposals involving their loss will be carefully assessed to ensure Dartmoor's business and industry needs would not be harmed.

#### Observations on Draft Policy

Our client is generally supportive of the strategy for the economy set out on page 103. However, some additional flexibility and clarity is still needed within draft Strategic Policy 5.1 (2) to create more opportunities to provide local jobs and services and enable the policy to meet the tests of soundness.

The Dartmoor National Park Authority recognises that suitable development land is extremely scarce within the National Park and, therefore, every effort must be made to optimise the use of existing sites if Dartmoor is to do its overarching duty of fostering the economic and social wellbeing of local communities. By explicitly allowing uses ancillary and complementary to the more traditional B1/B2/B8 employment uses (which are often located on employment sites), for example leisure/recreation uses falling within Use Class D2, Strategic Policy 5.1(2) would meet the tests of soundness by being:

- positively prepared – providing a strategy that has the flexibility to meet the needs of Dartmoor's settlements, create opportunities to provide new jobs and services and the make settlements more self-serving at a time when local services are declining.
- Justified – an appropriate strategy to optimise the use of existing employment sites in an area where development opportunities are limited.
- Consistent with national policy – enabling the delivery of sustainable development.

As an owner of an established business park in Christow (Gidley's Meadow), our client is aware of how local planning policies can unduly restrict the ability of established sites to respond to, and accommodate, changing occupier needs. Whilst Gidley's Meadow is experiencing good occupancy levels at present, measures do need to be put in place to make the site more resilient to these changing needs.

Gidley's Meadow is well-related to the centre of the community of Christow and could accommodate a range of complementary, employment-generating uses (that fall outside of the traditional Class B employment uses) within its existing built form, such as an ancillary cafe or a small farm shop. Providing some additional room for manoeuvre within the draft policy with explicit support for complementary uses would create opportunities to provide new jobs and services and make Christow more self-serving without the requirement for any new buildings (so as not to cause any visual harm to the special qualities of the national park). To re-iterate the example given back in January 2019, the owner has been approached by a local yoga instructor who was interested in taking a small vacant unit due to a lack of alternative opportunities in the village, but was prohibited by the current policy position. A similar approach was received from a local business keen to operate a small café and farm shop. Such uses inherently create more employment opportunities than uses strictly within, for example, Use Classes B1 or B8.

New investment in Gidley's Meadow would have the knock-on effect of enabling the owners to improve the aesthetics of the site; creating a better-quality business park, which would enhance the special qualities of the national park.

Suggested Revision to Strategic Policy 5.1(2) 4

Part 4 of draft Strategic Policy 5.1 (2) should clarify what is meant by 'economic uses', and the definition should include uses ancillary and complementary to the more traditional B1/B2/B8 employment uses, for example leisure/recreation uses falling within Use Class D2. Other complementary uses could be farm shops, trading local produce sourced from within a reasonable local radius, or small café units to serve the employees of the employment site and the local community, both of which would be employment generating uses.

### **Policy 7.1(2) Settlement Boundaries and Development Sites**

This draft policy states that settlement boundaries shown on the inset maps define the area of the settlements within which development will be permitted where it is consistent with policies in the Local Plan.

#### Observations on Draft Policy

Our client **SUPPORTS** the proposal to define settlement boundaries for the new Rural Settlements.

Our client is also supportive of draft Policy 7.1(2), particularly criterion 1, which states:

*“Settlement boundaries shown on the inset maps define the area of the settlements within which development will be permitted where it is consistent with policies in this Local Plan.”*

Our client **STRONGLY SUPPORTS** the settlement boundary as drawn on Map 7.15 – Christow and we consider this part of the Local Plan to be sound. Paragraph 7.1.5 lists the principles upon which settlement boundaries are drawn, stating that they are drawn tightly around the built form of the settlement, and lists employment uses as a use type that is normally included within settlement boundaries. Gidley’s Meadow is a well-established business site that is well-related to the village and it is the correct and appropriate approach, therefore, to include the business park within the settlement boundary for Christow.

The owners are looking into the possibility of improving footpath links to the village from the business park to improve connectivity.