

## **Honeybourne Parish Submitted Neighbourhood Plan Consultation**

### **RESPONSE FORM**

Under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, Honeybourne Parish Council has submitted its Neighbourhood Plan to Wychavon District Council. In accordance with Regulation 16, Wychavon District Council would like to invite comments from individuals and organisations on the submitted Neighbourhood Plan.

**This consultation runs from Friday 23 August to 5pm Monday 7 October 2019.**

All comments will be made publicly available and identifiable by name and organisation (where applicable). The personal information you provide on this form will be held and processed in accordance with the requirements of Data Protection Legislation. More information on how we will hold your data can be found at:

<https://www.wychavon.gov.uk/privacy-policy>

Please fill in your details in the boxes below:

Full Name: Katherine Lovsey-Barton

Organisation (if applicable): Pegasus Group on behalf of Johnson Brothers

Address (including postcode):

5 The Priory, Old London Road, Canwell, Sutton Coldfield, B75 5SH

Telephone number:

[REDACTED]

Email address:

[REDACTED]

Please state which part of the Neighbourhood Plan (i.e. which section, objective or policy) your representation refers to (please use a separate form for each representation):

General comment relating to document as a whole

Please use the space below to make comments on this part of the Neighbourhood Plan.

See attached detailed written representations (Sections 1, 2, 3 and 4), with particular reference to paragraphs 3.2 and 4.1-4.2.

Please use a separate form for each representation.

Please state whether you would like to be notified of the Council's decision on the Neighbourhood Plan proposal:

Yes

☒

No

☐

Please email this form to [policy.plans@wychavon.gov.uk](mailto:policy.plans@wychavon.gov.uk) or post it to Planning Policy, Wychavon District Council, Civic Centre, Queen Elizabeth Drive, Pershore, WR10 1PT.

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Appendix 4 -Policy Map;

Please use the space below to make comments on this part of the Neighbourhood Plan.

See attached detailed written representations (Sections 1, 2, 3 and 4), with particular reference to paragraphs 3.3, 4.1-4.2.

Please use a separate form for each representation.

Please state whether you would like to be notified of the Council's decision on the Neighbourhood Plan proposal:

Yes

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No

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Telephone number:

[REDACTED]

Email address:

[REDACTED]

Please state which part of the Neighbourhood Plan (i.e. which section, objective or policy) your representation refers to (please use a separate form for each representation):

Section 6-Policies- Employment- Policy H14

Please use the space below to make comments on this part of the Neighbourhood Plan.

See attached detailed written representations (Sections 1, 2, 3 and 4), with particular reference to paragraphs 3.4 -4.2.

Please use a separate form for each representation.

Please state whether you would like to be notified of the Council's decision on the Neighbourhood Plan proposal:

Yes

☒

No

☐

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# **HONEYBOURNE NEIGHBOURHOOD PLAN**

## **REGULATION 16 PLAN CONSULTATION**

### **REPRESENTATIONS**

**ON BEHALF OF JOHNSON BROTHERS**

**LAND AT HONEYBOURNE AIRFIELD/TWO SHIRES PARK  
INDUSTRIAL ESTATE, HONEYBOURNE**

**OCTOBER 2019**

**Pegasus Group**

5 The Priory | Old London Road | Canwell | Sutton Coldfield | B75 5SH

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester  
**PLANNING** | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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## APPENDICES

APPENDIX 1: SITE LOCATION PLAN

## 1. INTRODUCTION

- 1.1 These representations are submitted on behalf of Johnson Brothers in respect of the Honeybourne Neighbourhood Plan Regulation 16 consultation (Local Authority Publicity Period). These representations relate to 'Land at Honeybourne Airfield/Two Shires Industrial Estate', Honeybourne, which is being promoted for employment development. As a point of clarification, Honeybourne Airfield and the Two Shires Park Industrial Estate constitute the same site (as identified at the site location plan contained at **Appendix 1**).
- 1.2 The South Worcestershire Development Plan was adopted in February 2019. A review of the Development Plan is currently underway, with the Issues and Options Development Plan Review document consulted on in November 2018 to which Pegasus submitted representations on behalf of Johnson Brothers. The next stage of consultation in the form of the Preferred Options Development Plan Review document is scheduled to be published at the beginning of November (2019).
- 1.3 These representations are framed in the context of the requirements of Neighbourhood Plans to meet the Basic Conditions as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004. The Basic Conditions as set out in National Planning Practice Guidance Paragraph: 065 Reference ID: 41-065-20140306 are:
- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the Order (or neighbourhood plan).*
  - b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the Order. This applies only to Orders therefore is not applicable here*
  - c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders therefore is not applicable here.*
  - d. the making of the Order (or neighbourhood plan) contributes to the achievement of sustainable development.*

*e. the making of the Order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*

*f. the making of the Order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.*

*g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the Order (or neighbourhood plan).*

- 1.4 These representations relate specifically to 'Land at Honeybourne Airfield/Land at Two Shires Park Industrial Estate' (see location plan at **Appendix 1**). It should be noted that through the previous representations to the Regulation 14 consultation (as referenced in Appendix 5 to the Neighbourhood Plan Consultation Statement, pages 98-100), the site was being promoted in three ways, the first option being 100% employment (additional employment floorspace of up to 133,930 sqm gross), the second option being for residential purposes and the third option being mixed employment / residential use. Our client has since confirmed however that they wish to pursue the first option i.e. 100% employment.

## 2. SITE CONTEXT

- 2.1 Our client, Johnson Brothers, is promoting 'Land at Honeybourne Airfield/Two Shires Park Industrial Estate', for employment development, alongside carefully considered green infrastructure provision, including public open space and strategic landscaping.
- 2.2 The site comprises approximately 28 hectares (70 acres) of land, located off Weston Road/Honeybourne Road, Honeybourne, approximately 11km to the east of Evesham. A Site Location Plan is included at **Appendix 1** to this Representation.
- 2.3 Following the cessation of the former airfield use in the late 1940s the site is now utilised as an industrial estate, referred to as 'Two Shires Park Industrial Estate', with around 16 hectares of the brownfield site remaining undeveloped. A variety of buildings cover the area, and many are linked to transport-related businesses such as packaging companies and general haulage companies. Existing employment floorspace on site is approximately 23,037 sqm.
- 2.4 In respect of existing buildings on site, the largest are five former aircraft hangars, which comprise 16,492 sqm of employment floor space. Two of the hangars are located towards the north of the site near the site entrance, whilst the three other hangars are located along the western periphery of the site. Additionally, a scrapyards exists to the southern corner of site.
- 2.5 The site also includes a number of smaller employment buildings, as well as a weighbridge, a café, portacabins and a HGV washing rig. A small cluster of farm buildings, known as 'Home Croft' exists to the south of the site, accessed via a separate access off the B4035. There are numerous mature trees on site, including oaks, hawthorns and rowans which are subject to a TPO. Some airfield characteristics still exist, including a number of mounded bunkers which stand within vacant land around the periphery of the site, adjacent to the partially dismantled runways, which fall beyond the red-line for the promoted site.
- 2.6 To the east, the site is bounded by Weston Road, from which the existing access into the site is obtained.
- 2.7 On the opposite side of Weston Road is an existing sewage works and agricultural land. Further along Weston Road is a substantial collection of industrial buildings occupied by over 40 companies.

- 2.8 The site itself is predominantly level, with internal vehicle movements provided via a loop road connected to Weston Road. The site is not subject to any designation in respect of conservation, ecology or landscape.
- 2.9 The site is bounded by a partially-dismantled railway to the south, which previously connected Stratford-upon-Avon with Cheltenham, serving the airfield during the war. It is understood that high-level discussions have taken place to re-open this line on a commercial basis. Should this occur, Honeybourne Airfield/Two Shires Park Industrial Estate, would represent an ideal location for a stop, either for passenger or freight services.
- 2.10 Land at Honeybourne Airfield/Two Shires Park Industrial Estate, is being promoted for further employment development through the South Worcestershire Development Plan Review. It is confirmed that it is deliverable, being able to come forward within five years
- 2.11 The site benefits from a sustainable rural location, located on existing bus routes, with Honeybourne Railway Station also located approximately 2.3km to the north of the site.
- 2.12 Due to the size of the proposed development, there exists an opportunity to enhance the existing sustainable transport offer, for example by including a bus stop adjacent to the site on Weston Road, and a possible longer term opportunity for improved rail linkages.
- 2.13 Further information about the proposals can be supplied should this be required.

### 3. THE NEIGHBOURHOOD PLAN

- 3.1 As mentioned previously, the Neighbourhood Plan must meet the requirements of the Basic Conditions, and these representations are made in the light of these, focusing upon those areas of particular relevance.

**Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the Order (or Neighbourhood Plan).**

- 3.2 It should be noted that in terms of various references throughout the document, these need to be consistent with up to date legislation, including the National Planning Policy Framework February 2019 and the associated guidance, as some of the references made within the document (for example paragraph 8.2 which references CIL and Regulation 123 Lists) are now incorrect.
- 3.3 The Policy Map (included at Appendix 4 of the Plan) needs amending to fully show the extent of the Neighbourhood Area / Parish as it is truncated to the south, missing off part of the area covered by our client's site.
- 3.4 The National Planning Policy Framework (NPPF) clearly states that the purpose of the planning system is *'to contribute to the achievement of sustainable development'* (paragraph 7) and sets out three overarching objectives: economic, social and environmental (paragraph 8). In applying these principles, it then goes on to state that *'planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area'* (paragraph 9).
- 3.5 The Neighbourhood Plan recognises the importance of the local economy to the village as part of a sustainably balanced community, stating in paragraph 6.87 that *'it is important that there are a range of employment opportunities within the parish'*, explaining the local links and specifically referencing Honeybourne Airfield (paragraph 6.89).
- 3.6 The Neighbourhood Plan then substantiates this through Policy H14 (Retention and Redevelopment of Existing Employment Sites Policy) which safeguards Honeybourne Airfield Trading Estate and Two Shires Park for employment-generating uses during the plan period.

3.7 This accords with the NPPF Chapter 6 (Building a strong, competitive economy) particularly paragraph 81a) which states that planning policies '*should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth*' and paragraphs 83 and 84 which support a prosperous rural economy including '*the sustainable growth and expansion of all types of business in rural areas both through conversion of existing buildings and well-designed new buildings*' (83a).

3.8 Policy H14 is therefore supported in terms of how it has regard to national policies and advice contained in guidance issued by the Secretary of State

**The making of the Order (or Neighbourhood Plan) contributes to the achievement of sustainable development.**

3.9 Many aspects of the plan have regard to the need to achieve sustainable development.

3.10 As stated in the section on how the plan has regard to national policy, the Neighbourhood Plan recognises the importance of the local economy to the village as part of a sustainably balanced community, stating in paragraph 6.87 that '*it is important that there are a range of employment opportunities within the parish*', explaining the local links and specifically referencing Honeybourne Airfield (paragraph 6.89).

3.11 The Neighbourhood Plan substantiates this through Policy H14 (Retention and Redevelopment of Existing Employment Sites Policy) which safeguards Honeybourne Airfield Trading Estate and Two Shires Park for employment-generating uses during the plan period.

3.12 Furthermore, the Reasoned Justification to H14 states that '*encouraging existing businesses to stay in Honeybourne is important for maintaining a range of employment opportunities and provides wider economic benefits through increased spending locally. Having an easily accessible range of employment opportunities can also potentially bring about environmental benefits as it can encourage local residents to work within the parish, reducing commuting and the impact on the environment*'.

3.13 This accords with the overarching principles of the NPPF to deliver sustainable growth and in particular NPPF Chapter 6 (Building a strong, competitive economy) particularly paragraph 81 (part a) which states that planning policies '*should set*

*out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth'.*

- 3.14 The Neighbourhood Plan, including Policy H14, is therefore supported in terms of how it contributes to the achievement of sustainable development.

**The making of the Order (or Neighbourhood Plan) is in general conformity with the strategic policies contained in the Development Plan for the area of the authority (or any part of that area).**

- 3.15 The Neighbourhood Plan needs to be in broad conformity with the South Worcestershire Development Plan, adopted February 2016. Here, Honeybourne is designated as a Category 1 Village in Wychavon District. Policy SWDP 2 (Development Strategy and Settlement Hierarchy) explains the overarching principles behind the settlement hierarchy. Beyond the urban settlements, Category 1 villages are the next tier, providing the greatest range of services and facilities and having a particular role in meeting local housing and employment needs. The fact that the Neighbourhood Plan recognises the importance of the local economy to the community is welcomed, particularly as it directly references Honeybourne Airfield and the Two Shires Park Industrial Estate.
- 3.16 As a point of clarification, Honeybourne Airfield and the Two Shires Park Industrial Estate referenced in Policy H14 constitute the same site (as identified at the site location plan contained at **Appendix 1**) and as such, it is suggested that a minor amend is made to this policy to include reference to 'Honeybourne Airfield/Two Shires Park Industrial Estate' under one bullet point instead of across two separate bullet points to avoid any unnecessary confusion/duplication.
- 3.17 The Neighbourhood Plan complies with SWDP 8 (E) (Providing the Right Land and Buildings for Jobs) which states that *'the provision of employment land and the conversion of existing buildings to support job creation throughout South Worcestershire will be supported providing the development supports an existing business or new enterprise of a scale appropriate to the location'*.
- 3.18 The Neighbourhood Plan complies with Policy SWDP 12 (Employment in Rural Areas). This policy relates to Category 1,2 and 3 villages in the defined settlement hierarchy of which Honeybourne falls within Category 1. Part B of this policy states that *'to help promote rural regeneration across south Worcestershire, existing employment sites in rural areas that are currently, or were last used for B1, B2, B8, tourism, leisure and / or recreation-related purposes will be safeguarded for*

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*employment-generating uses during the plan period'. Part C of the policy states that 'the expansion of existing employment sites in rural areas will be supported where it has been demonstrated that intensification of the existing site is not viable or practical'.*

- 3.19 Policy H14 therefore conforms with Policy SWDP 12 although it is considered that the wording of H14 could be bolstered to more directly reflect the wording of SWDP 12, particularly Part C (as identified above).

#### **4. CONCLUSIONS**

- 4.1 As set out in these representations, the Neighbourhood Plan is considered to meet the Basic Conditions, subject to the document being modified to ensure that it reflects the most up to date national policy wording and legislative changes which have recently been made.
- 4.2 The recognition of the importance of Honeybourne Airfield / Two Shires Park Industrial Estate to the local economy is welcomed and supported.

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# APPENDIX 1

