Comments

Site Specific Part 2 Local Plan - Publication Plan Consultation (18/12/19 to 12/02/20)

Comment ID 156
Response Date 12/02/20 10:12
Consultation Point Policy EMP3 Non Employment Uses (non-B use class) in Safeguarded Employment Areas (View)
Status Processed
Submission Type Email
Version 0.2

Representation
Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?
  Policy EMP3

Tests of Soundness
Do you consider the Local Plan is sound in terms of being:

Justified . No
Effective . No
Positively prepared . No
Consistent with National Policy . No

Legal and Procedural requirements

Do you consider the Local Plan has been prepared in line with legal procedural requirements? Yes

Duty to Cooperate

Do you consider the Local Plan to be compliant with the Duty to Cooperate? Yes

Reasons
Please give the reason(s) why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate.

Draft Policy EMP3 sets out a series of criteria that would apply where non-employment uses in Safeguarded Employment Areas are proposed. We do not take issue with these criteria, however, to avoid any misunderstanding, it would be beneficial to state that such proposals must also comply with other policies in the development plan. For example, proposals for ancillary retail, café or leisure uses must comply with Draft Policies TCE5 and TCE6.

Proposed Actions/Changes

Please explain what changes or actions are needed to make the Local Plan legally compliant.

See above – an additional criterion is needed which makes clear that proposals for ancillary nonemployment uses in Safeguarded Employment Areas must also comply with other relevant policies in the development plan. This could be made clear in the Policy / supporting text through the inclusion of the following statement: “Proposals for non-employment uses in Safeguarded Employment Areas must also comply with other policies in the development plan”. This approach has been used elsewhere in the draft Plan (for example Paras 10.7, 11.7, 12.7 and Draft Policies BRA2 and MAW2).

Attendance at the examinations hearings

If you are seeking to change the Plan, would you like to attend the examination hearings? Yes

Notifications

Do you wish to be notified? . When the Plan is submitted for independent examination?
. When the Inspector’s Report is published?
. When the document is adopted?