



**ECONOMY/EMPLOYMENT/RETAIL - Policies CP8, CP9 and WT3
Session/Issue 2:**

iv) **Is it appropriate in principle and reasonable in practice to safeguard existing employment areas and/or should more flexible criteria [such as in relation to economic viability] be used to help make more effective use of brownfield sites [PDL]?**

1. NPPF paragraph 22 explains that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose that applications for alternative uses should be treated on their merits. As Policy CP9 is currently drafted it is unduly restrictive and does not allow the market any flexibility unless it meets very specific criteria in what is a negatively worded policy.
2. In order to comply with the NPPF, ensure flexibility and choice to the market and to make more effective use of land Policy CP9 should be amended as follows:

In order to retain a mix of employment land and premises in the District, the Local Planning Authority will ~~resist~~ **permit** the loss of existing employment land and floorspace within Use Classes B1, B2 or B8 **to other uses**. ~~Losses will only be permitted where retaining a business use would not be reasonable~~ **where the applicant can demonstrate that there is no reasonable prospect of the site / building being used for that purpose and where the need for the alternative use can be demonstrated.** ~~having regard to the following:~~

- ~~• the redevelopment potential for other employment uses, including the scope for intensifying or providing an effective use of the site or building, and the potential to improve and extend the range of modern employment floorspace;~~
- ~~• whether the building or use meets or could meet a specific local requirement, such as providing low cost start up accommodation;~~
- ~~• the environmental impact of business use on neighbouring uses;~~
- ~~• the access arrangements for the site/buildings, by road and public transport;~~
- ~~• strength of local demand for the type of accommodation;~~
- ~~• the benefits of the proposed use compared to the benefits of retaining the existing use.~~

3. **Notwithstanding our suggested revised wording, in our opinion, the JCS is clearly unsound and cannot be rectified by merely revising text or policies. Rather, the JCS needs to be reconsidered in light of the evidence we have submitted and a revised Plan brought forward that reflects the housing and economic needs of the area, complies with the duty to cooperate and fully meets the requirements of the NPPF.**