

Policy C4 Consideration of Informal representations.

The further re drafting of Policy C4 tries to take on board the informal representations received.

In particular, in response to Blackburn Borough Councils comments, the reference to 'commercial' uses has been deleted. The Council agrees that this term is not necessary as such uses are covered by the terms 'employment' and 'industrial'.

The Borough Council raised concern about alternative enabling uses on the site and their potential scale. The Council proposes to add a new sentence to the policy to address this as follows:

The scale of any alternative enabling development will be limited to that which is clearly demonstrated to be necessary to fund essential infrastructure and which will not prejudice the delivery and maintenance of the primary employment function of the site.

Whilst this does not follow the wording suggested by Blackburn, the Council believes it adequately addresses the issue raised.

DPP Planning on behalf of First Investments Real Estate Management also suggested wording in relation to alternative uses where viability is an issue. The Council considers that the addition of the above sentence also addresses their concern.

The Brookhouse Group raised concern about the reference to 'employment aspirations' that this was an ambiguous phrase. Replacement text 'employment generating development' was suggested. The Council feels it would be more appropriate and clearer to refer to employment uses. Such uses are generally defined as B1, B2 and B8 uses. This wording of the policy has therefore been amended to state **employment uses on this strategic site.**

Brookhouse also make comment on the insertion of the word 'Employment' in the title to the policy, that it may lead to ambiguity of whether the intention is for a strategic employment site (eg for a single employer) or a strategic site to deliver employment. The Council does not agree that any ambiguity is inferred. The use of the term Employment to describe the Strategic Site is in line with Policy 1 of the Core Strategy, which clearly refers to the site as a Strategic Employment Site. The inclusion of employment in the title also reinforces the fact that this site is an employment allocation, where alternative uses may be appropriate as enabling development.

This resposdee also comments about the repeated use of the word Strategic in the policy. It is not considered to be necessary and again could be ambiguous. The Council does not agree. The proposed wording reinforces the allocation of the site as a strategic site for employment uses.

NLP on behalf of Aviva Investors suggest the complete removal of the last paragraph of the policy, removing all reference to alternative uses, as they consider this to be superfluous and unnecessary bearing in mind the impact and sequential tests for main town centre uses set down in national planning policy. The Council does not agree and considers that this paragraph is an important part of the policy to explain the circumstances in which such alternative uses would be considered favourably on the site. It addresses the issues of

viability and deliverability in order to ensure that the policy is effective and positively prepared.

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