

Matter 5 Statement

5.4 - Supporting a strong and sustainable local economy (Policies DEV14, DEV15 and DEV19)

i Do the policies in the JLP provide sufficient flexibility to accommodate unanticipated employment needs and to allow a rapid response to changes in economic circumstances in accordance with national policy?

ii Is Policy DEV14 consistent with paragraph 22 of the Framework, particularly in circumstances where there is no reasonable prospect of a site being used for the allocated employment use?

- 1.1 In order to fully comply with NPPF paragraph 22 and national policy, Part 2 of the policy should be amended to reflect greater flexibility.
- 1.2 Part i. should allow for any reflection of circumstances relating to existing businesses or other site-specific circumstances including the positive sustainable re-use of brownfield land or the sustainability benefits associated with mixed-use development and balancing land uses. The policy wording should be amended to include 'unless market or site specific factors would affect the expansion of purely economic floorspace.'
- 1.3 Part ii. should clarify the definition of 'marine-related uses' to ensure that it is broad enough to consider the ancillary or supporting services required to support marinas, including leisure, tourism and ancillary uses to be able to 'accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances' as per paragraph 21 of the NPPF. Modern marinas require a balance of uses on site to attract leisure users and bertholders, which is critical to supporting the overall sustainability of the marine economy. Therefore, the policy wording should read 'marine related and supporting and ancillary uses.'

iii In relation to Policy DEV15 which supports the rural economy:

c. Should point 7 refer to other designations besides the Undeveloped Coast policy area?

- 1.4 Given that the 'Undeveloped Coast' policy area includes, existing developed sites (anomalously), this specific designation should not be included within the policy wording. Other development management policies for the protection of other designated sites, landscapes and environments will sufficiently manage new development in these areas, where appropriate.

iv Is it appropriate for all major development proposals to enter into site related employment and skills plans as set out in Policy DEV19?

- 1.5 Premier Marinas supports the principle of the policy, however, as currently drafted, the policy is too general and will not likely be effective as it does not recognise the land use, operators or other site-specific qualities which would likely impact on the employment and training demands.
- 1.6 The NPPF requires, at paragraph 173, that 'the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened'. Paragraph 204 requires planning obligations to meet the following tests: that they are necessary; directly related to the development; and related in scale and in kind to the development.
- 1.7 The application of a blanket policy that affects all major development proposals is not likely to be able to be either site-specific or necessarily related in scale and kind to the development proposals. Site area does not necessarily equate to either development or other impact for which it is appropriate to provide employment and skills plans. Neither do

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all major proposals require significant construction and therefore the requirement to provide skills and employment in relation to the construction industry would be disproportionate.

- 1.8 This type of requirement should, in our view, not be a policy requirement but could be included as guidance or a suggestion in any Obligations supplementary guidance that could then set out more detailed criteria which is proportionate to the type and ability of sites and development proposals to contribute most effectively to achieving the overall aim.