



Braintree District Council

Local Plan Examination of Section 2

Main Matter 3 – A Prosperous District
- A Strong Economy
– Policies LPP 2 to LPP 9

June 2021

Main Matter 3 - A Prosperous District - A Strong Economy – Policies LPP 2 to LPP 9

Policy LPP 2 Location of Employment Land

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Are the above policies and site allocations justified by appropriate available evidence, having regard to national guidance, and local context, including the meeting the requirements of the BLP Section 1?

- 3.1 In national policy one of the three pillars of sustainable development is an economic role, part of which is ensuring “that sufficient land of the right type is available in the right places and at the right time to support growth”. At paragraphs 18-22 of the NPPF, particularly the six bullet points of paragraph 21, the government sets out how the strategies, policies and allocations of Local Plans should contribute to achieving economic growth. For the industry sectors located in Braintree District, the most pertinent points include setting out a clear economic strategic vision and strategy; setting criteria or identifying strategic sites which match the strategy and meet anticipated needs over the plan period; and, supporting existing business sectors, and identifying and planning for new or emerging sectors. While paragraph 21 sets out what planning policies should do, paragraph 22 stipulates that 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.
- 3.2 Over half of Braintree District is rural in character and therefore is considered to also fall within the confines of NPPF, Chapter 3, supporting a prosperous rural economy. It states that planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local authorities should support rural businesses through conversion of existing buildings and well-designed new buildings, agricultural diversification, and sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside.
- 3.3 The policies LPP2 to LPP9 of the BLP Section 2 work together to deliver the vision and objectives of BLP Sections 1 and 2, particularly the employment needs set out in SP5 of BLP Section 1, which also adheres to the spatial strategy established by SP3 of BLP Section 1, and LLP2 of BLP Section 2, to accommodate development within or adjoining existing settlements. As such LPP2 and LPP3 have an emphasis on focusing activity and new development at Braintree, Witham, Halstead and within the A12/Great Eastern Mainline. This will also enable the benefits of co-locating new employment land with

new homes and therefore meets the requirements of sustainable development.

LPP2 Location of Employment Land

- 3.4 The Employment Land Needs Assessment (ELNA) August 2015 ([BDC032](#)) combines an employment land review with sector-by-sector economic analysis. In the conclusions and recommendations of the ELNA there are seven recommendations linked with justifications which were adopted by the Council at Local Plan Sub-Committee 16th May 2017. This was transposed into BLP Section 1 policy SP5 Employment (need) and for the location of (new) employment land, as allocated through BLP Section 2 LPP2.
- 3.5 The overall requirement from employment land in order to deliver a strong, sustainable and diverse economy is set out in BLP Section 1 policy SP5 Employment in the range of 20.9 (Baseline) – 43.4ha (Higher Growth Scenario) for Braintree District. This was built on by policy LPP 2 Location of Employment Land and its preamble (6.1 to 6.17) which covers the context, justification and the land allocations to meet adopted employment land needs over the plan period.
- 3.6 To ensure that sufficient land of the right type is available, the Council has allocated up to 42.129 hectares of new strategic employment sites through LPP2. A summary of these and the planning status of them are set out below in Table 1.

LPP3 Employment Policy Areas

- 3.7 LPP3 seeks to protect the best performing functional employment land clusters, as identified on the Policies Map, by limiting land uses through the five criteria A to E, including additional criterion (a) as per MM12 of document [SDBDC008a](#). In September 2020, the government revoked use class B1 and incorporated these uses into class E, allowing a broad range of interchange to non-employment without planning permission, however it remains a requirement of the Framework to ensure that employment land needs are met. This is discussed in Section 3 of BDC Topic Paper 1 Consequential Changes. However it should be noted that a number of changes to employment policies LPP2 to LPP9 are suggested to the inspectors which are necessary to make them sound.
- 3.8 At the core of the ELNA's methodology is the economic theory of agglomeration which would be enhanced by expanding on industry sectors where there is relative specialisation and competitive strength, by spatially co-locating business into clusters. The consultants carried out a site-by-site review of existing employment clusters and qualitatively valued each one, accounting for parking, public transport, strategic road access, delivery access, quality of environment and redevelopment potential; this has led to

substantial de-designations of poorly performing or vacant land in accordance with the NPPF para 22.

- 3.9 There is around 300ha of designated employment land in the District, the largest clusters are Springwood Drive and Skyline 120 in Braintree/Great Notley and Eastways/Freebournes in Witham. Functional clusters can be found at Bluebridge Industrial Estate in Halstead and around rural service centres like Earls Colne, Feering, or stand-alone rural sites, such as Gosfield Airfield and Earls Colne Business Park, however the strategic focus of employment growth will be the expansion of employment land in Braintree (with Bocking and Great Notley) and Witham. These two locations are accessible by rail, on strategic bus corridors and have suitable access either the A12 or A120 dual carriageways.

LPP4 Kelvedon Park

- 3.10 In addition to the new employment land allocated through LPP2, LPP4 allocates 3.3ha at Kelvedon Park for expansion of the emergency services headquarters. It is a stand-alone policy that is required to address site specific issues, specifically historic environment and landscape. LPP4 identifies and supports a unique business sector of a regional emergency services HQ in accordance with paragraph 21 of the NPPF.
- 3.11 It should be noted that route planning has progressed on the A12 widening project and continued access from the site to the A12 has been planned.
- 3.12 This policy is required to provide additional employment land for specialist need in the plan period until 2033 and the policy is thus consistent with national policy and justified by a relevant evidence base.

LPP5 Allshots Farm, Rivenhall

- 3.13 LPP5 is an individual policy required to address site specific issues including landscaping and lighting in a rural setting. As such a site specific policy was considered necessary and appropriate.

LPP6 Business Parks

- 3.14 LPP6 has the same objectives as LPP3 with even further specialisation limiting land use to class E(g) to protect these highly valued agglomerations. The majority of designations are in rural areas and contribute to supporting a rural economy as well as ensuring the specific constraints of their locations are noted. Suggested change MM13 of SDBDC008a is necessary to respond to the change in the use class order and as explained in Section 3 of BDC Topic Paper 1 Consequential Changes (PP12) is required to ensure that these rural business parks can be protected as far as possible to provide high quality jobs.

LPP7 Design and Layout of Employment Policy Areas and Business Parks

- 3.15 The Council seeks to delete Policy LPP7 and its supporting text in accordance with MM14 the further suggested modifications outlined SDBDC008a. The high design quality being sought by this policy is adequately secured by policies LPP45 Parking Provision and LPP55 Layout and Design of Development and the Council considers on reflection to repeat here again would be a duplication.

LPP8 Rural Enterprise & Policy LPP 9 Tourist Development within the Countryside

- 3.16 Policies LPP8 and LPP9 reflect the need to support the rural economy by allowing redevelopment or new development of buildings outside the development boundary as an exception policy so long as the purpose is for small-scale commerce or viable tourist accommodation/facilities. LPP8 has regard to policy SP3 of the BLP Section 1 which seeks to support diversification of the rural economy beyond the main settlements. These policies are also consistent with NPPF para 28, to support a strong rural economy, while providing a more detail on the Council's expectations for acceptable environmental impact.

Do the employment policies (LPP 2 to LPP 9) within the “A Prosperous District” chapter of the BLP Section 2 make adequate provision to meet Braintree’s economic growth requirements for the plan period and its timescale for delivery?

- 3.17 As discussed above, SP5 in the BLP Section 1 establishes a requirement for the allocation of employment land within E(g) and B class uses of between 20.9ha to 43.3ha in order to ensure employment need is met. LPP2 makes allocations to provide up to 42.129ha of new employment land suitable for office, research & development, industrial, storage and distribution uses. This is a mixture of stand-alone employment sites, extensions to existing employment sites and employment to be developed alongside strategic residential housing sites to promote sustainable development This is enough land to meet the needs of SP5's higher growth scenario and represents a significant amount of headroom for choice and completion in the market for land, despite a reduction from the 51. ha of land allocations in BLP Section 2 as submitted. A higher allocation should also provide some resilience and flexibility in uncertain market conditions caused by global and international externalities. Table 1 below sets out the planning progress on each of these sites. In addition it is likely that further small scale employment sites are likely to come forward through the development management process during the course of this plan period.
- 3.18 LPP4 is the only other policy that allocates new employment land, however this is a unique business sector (meeting requirements of the emergency services) and wouldn't be made available on the open market, as such whilst

it will provide employment opportunities, given their specialist nature it was considered appropriate to not include this within the main allocations in LPP2. The remaining policies either seek to protect existing employment areas, to ensure that replacement land will not be required, or to support small scale rural diversification. The Council will monitor the employment land supply position in accordance with the monitoring framework, and proactively manage supply through planning application process.

3.19 The table below summarises the progress of new employment land allocated within LPP2.

3.20 The site wide infrastructure works for the major new employment allocation on Horizon 120 are nearing completion and three owner occupier buildings have already been through the LDO compliance checklist, alongside a central enterprise centre which is being part funded by the South East Local Enterprise Partnership. These buildings are all expect to start work on site in the next few months. As the site is 18.5ha of employment uses, its development makes a significant step towards achieving the baseline requirement of 20.9ha in policy SP5. Planning applications on site (c) have also been submitted totalling 6.879ha, giving confidence that the baseline employment requirement can be met within the plan period. The six smaller clusters of new employment land of 2 to 4 hectares will be delivered by the end of the plan period through design and build or as part of mixed-use schemes for strategic growth locations, many of which are in competitive locations and/or complement LPP3/LPP6 employment land, to achieve the higher growth scenario.

3.21 Paragraph 5.17 of the economic viability study ([BDC008](#)) shows that non-residential land in the district is often marginal or not viable so policy LPP2 often allocates sites through a Strategic Growth Location to enable delivery alongside residential to achieve economic development benefits.

Table 1 summary of employment policies

Ref & Site	Proposed Uses	Area (ha)	Planning status	Comments
a) Extension to springwood drive	Up to 0.95ha Employment policy area	0.95	Outline consent granted as per 15/01319/OUT Delivery with housing, in trajectory as provision between 2026/27 to 2032/33.	Planning application linked with SGL allocation LPP21. Change from 2017 - yield from site reduced from 10ha and additional financial contributions to help provide employment facilities elsewhere.
b) Horizon 120	27.27ha Business	18.5	Approved Local	Council ownership. The infrastructure on site is

	and Innovation Park		Development Order 19/00001/LDO Under Construction	almost completed and the first owner-occupiers are expected to start building premises summer 2021.
c) Extension to Eastways, Witham	Employment policy area	6.879	a) Application submitted as per 20/00128/OUT b) Application submitted as per 21/00031/OUT Estimated delivery by 2025/26	Extension to Eastways which will come forward as two separate planning applications. Pre-application discussions have taken place to ensure that access can be achieved. Site a. Ownership of PFE Express 3.3ha and site b. Ownership of Aquilla Estates 3.57ha. Design and build scheme for PFE and speculative for Aquilla, access to b provided via agreed right of way across site a.
d) Extension to Bluebridge, Halstead	Employment policy area	2	allocation	Planning officers have met with landowner
e) Land east of Great Notley	Strategic Growth Location	Up to 3 (40% Class E(a))	Site illustrative masterplan in preparation. Delivery with housing, in trajectory as provision between 2023/24 to 2032/33.	Planning application as part of Strategic Allocation LPP18 and will be delivered in accordance with the parameter plan.
f) Land east of Broad Road	Strategic Growth Location	Up to 3	Outline permission as per 18/01318/OUT Delivery with housing, in trajectory as provision between 2022/33 to 2032/33.	Planning application as part of Strategic Allocation LPP19 and will be delivered in accordance with parameter plan.

g) Land at Feering	Strategic Growth Location	Up to 4 (40% Class E(a))	<p>Site illustrative masterplan in preparation.</p> <p>Delivery with housing, in trajectory as provision between 2025/26 to 2033/34.</p>	<p>Planning application as part of Strategic Allocation LPP22 and will be delivered in accordance with parameter plan.</p>
h) Maltings Lane Business Park	Retained allocation for business uses	3.8	<p>Outline consent as per 12/1071/OUT</p>	<p>Carried over from allocation of a major new neighbourhood in previous Local Plan.</p> <p>Council is in active discussion with the developer regarding the residual land, including residential, retail and community uses for this development.</p> <p>Will need to come forward as a full application.</p>
Total		42.129		

Extension to springwood drive (ref: a)

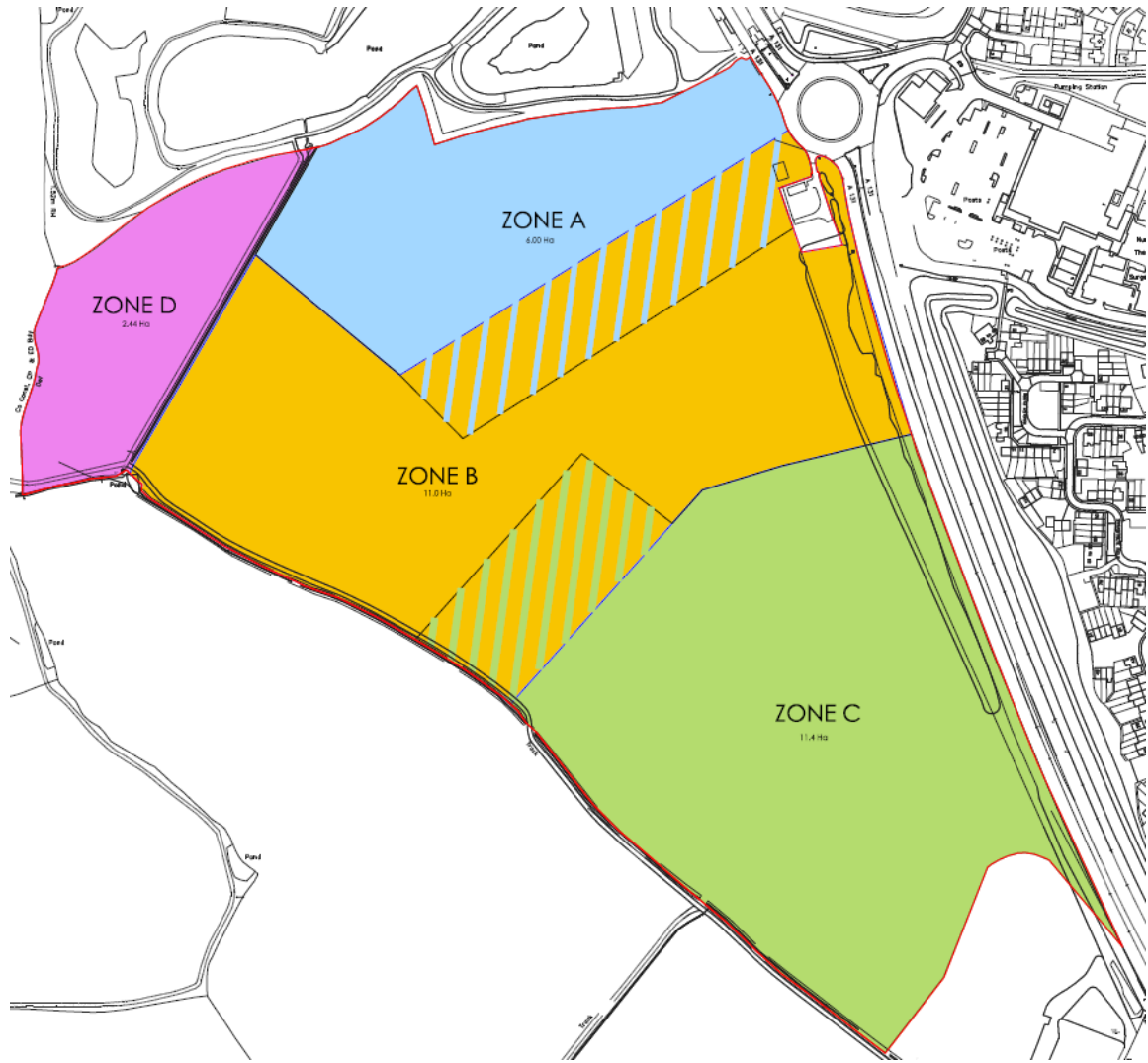
- 3.22 This employment land is part of a hybrid application where full permission is granted for 189 residential units and a link road to be constructed to the south of the site. The employment element is 0.95ha which is a small part of a mixed use site of 44.11 ha, comprising of a mixed use centre, education, green infrastructure and more residential with outline permission only.
- 3.23 This employment element was revised down from 15ha requirement in the core strategy to 8.73ha in the 2015 application and finally 0.95ha in 2019 application. In each revision the land budget was balanced from employment to residential. In lieu of employment land, a financial contribution of £2,925,000 was secured for measure and initiatives to provide employment in the vicinity of the development.
- 3.24 The illustrative plan shows the proposed employment site; it will be directly accessed from Springwood Drive and its size and scope will likely be complementary with existing small and medium sized businesses in the employment cluster.
- 3.25 Outline consent granted as per [15/01319/OUT](#)



Illustrative map showing location of employment land within Land at Panfield Lane (labelled) (ref:a).

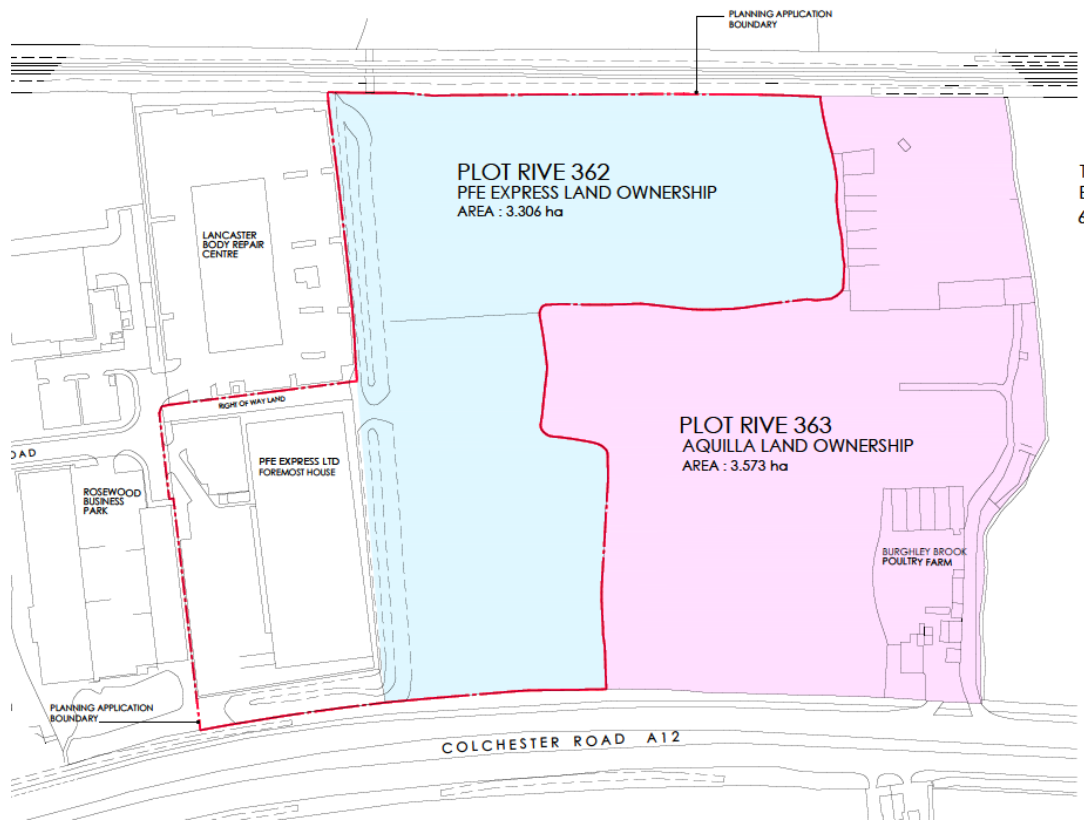
Horizon 120 (ref:b)

- 3.26 This site was originally allocated for employment uses within the 2011 Core Strategy and this Plan seeks to carry forward that allocation, broadly unchanged from its original designation.
- 3.27 A local development order (LDO) permits development within the site boundaries so long as it meets the requirement of the LDO, comprising of a masterplan and design code, which can be secured through a Confirmation of Compliance. This regime significantly speeds up the planning process and allows businesses to respond rapidly to economic opportunities. Once the LDO was permitted in April 2020, the whole development was effectively granted planning permission and there is limited scope for further public consultation or LPA input. Therefore, the LDO provides an accurate description of the likely outcome of development once it's completed. Three buildings have already been approved through this method, have confirmed occupiers and expect to start construction on site later this summer.
- 3.28 A revised LDO ([21/01783/LDO](#)) is also currently in production, subject to a public consultation period. The consultation proposes making a number of minor changes to the LDO which including updating to reflect the use class order changes in September 2020, making a minor realignment of the spine road to ensure a new electric minibus hub can be served and increases the maximum footprint of buildings on site (within the same overall site area as previously).
- 3.29 The site area totals 27.27ha however a significant proportion of the site is set aside for structural landscaping, park and SUDS (2.44ha). Zones A, B and C will host the 'hub' and the office, R&D, light manufacturing and storage and distribution expected from an employment policy area and covers approximately 20ha. The 'hub' is a 2ha area permitting shops, restaurants, gymnasiums and crèches, plus a hotel no larger than 120 beds.
- 3.30 The site also provides access for a 2.33ha electric forecourt to the south (outside the redline boundary) as per [19/01092/FUL](#).
- 3.31 Approved Local Development Order 19/00001/LDO (Under Construction)



Illustrative map showing location of employment land within Horizon 120 (ref:b).

Extension to Eastways Industrial Estate (c)



Illustrative map showing location of employment land at Eastways Industrial Estate (ref:c).

- 3.32 This is an employment cluster extension north east of Eastways Industrial Estate on land between the A12 and GEML where land is in two ownerships; a) PFE Express and b) Aquilla Estates and both owners have submitted application now pending decision. These sites are newly allocated to the 2017 Local Plan having been taken through the call for sites process as RIVE 363 and RIVE 362. The site is adjacent to the A12 which is currently subject to an NSIP application for an expansion to three lanes in both directions however the plans proposed do not significantly impact on this site.
- 3.33 Application a) would directly support the growth and expansion of PFE Express, a freight forwarding company which currently employs 125 FTE jobs, by meeting its additional accommodation needs. Seven site layout options were presented with the outline application including variations of the building extension for PFE use plus a large 9,300-12,700 sqm stand-alone unit as a speculative development for sale or lease on the open market. The options also explore breaking up the large unit into eight units of around 1,000 sqm, among others. Taking these options together, officers consider there would be somewhere between 12,000 to 15,000 sqm of additional B2/B8 use with

ancillary E offices when the development is completed (application maximum is 15,470 sqm).

- 3.34 Application b) is also an outline application which is a more speculative proposal on a similarly sized site by commercial property developer Aquilla Estates Ltd. Indicative illustrative site layouts show a development of 3 units in the 3,000 – 7500 sqm range with the development totalling around 16,000 sqm of additional B2/B8 use with ancillary E offices.
- 3.35 Given the planning applications currently being considered, the Council sees no reason why the two sites will not come forward for development within the plan period.

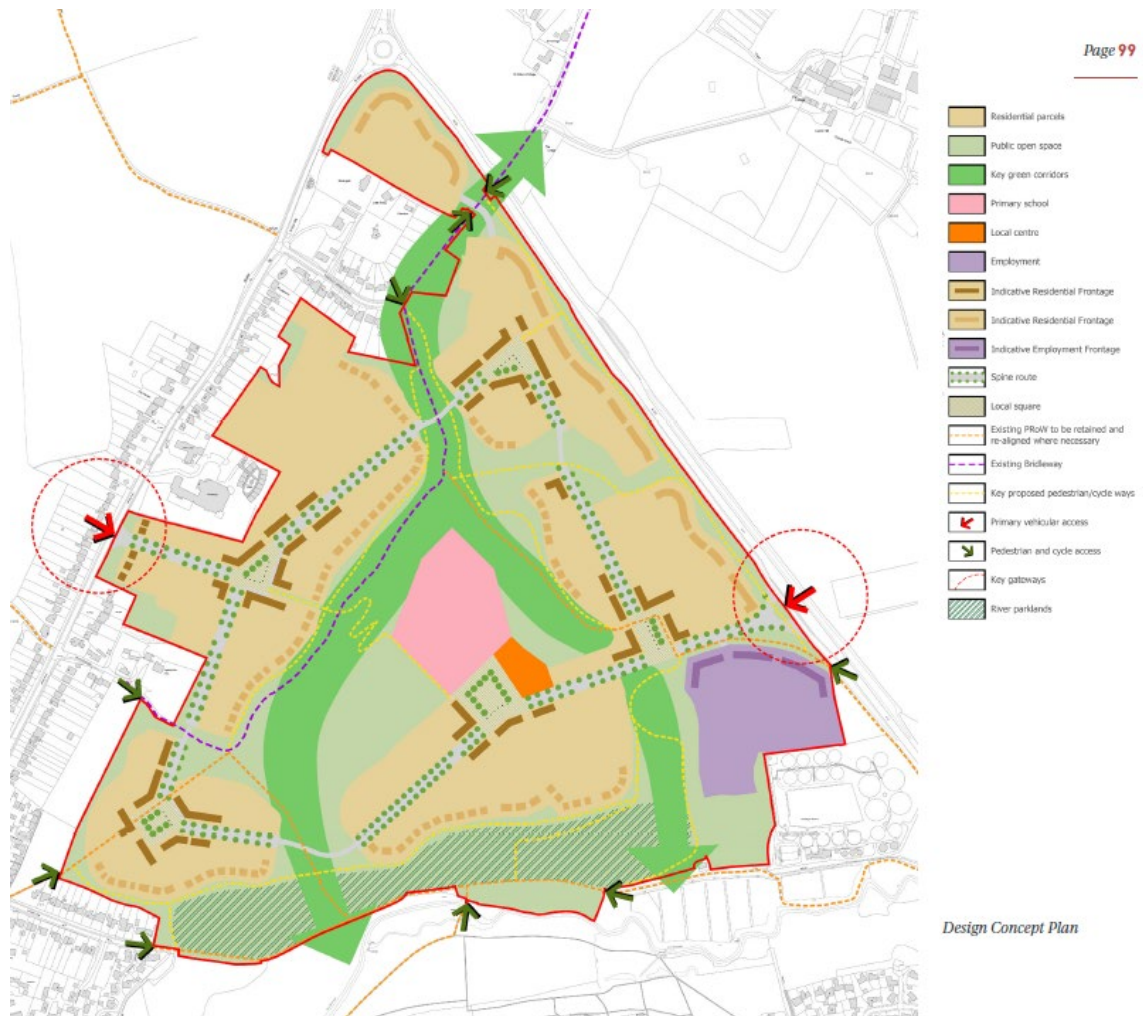
Bluebridge industrial estate (ref d)

- 3.36 This is an extension eastwards of the existing employment cluster. The call-for-sites submission was for a much larger allocation however this is considered to be a less favourable location for a large employment allocation due location – the site is relatively remote from the A120/A12 strategic highway network and the impact that heavy good vehicles servicing the new units would access via Halstead High Street.
- 3.37 Whilst there is no planning permission or permission being considered for this site at present, there is nothing to suggest that the site would not come forward within the course of the plan period between now and 2033. However if the site were not to progress, the Council would still be allocating sufficient employment land to meet the higher growth scenario in the employment land range, as adopted in BLP Section 1.

Land east of Great Notley (ref e)

- 3.38 This is a strategic allocation of 1,750 dwellings will include a local centre and up to 3ha of employment land which are distinct land uses but could be co-located. This will be delivered by policy LPP18 Strategic Growth Location – Land East of Great Notley. Strategic Growth Locations have allocated employment policy areas to allow for some flexibility in the face of economic uncertainty however it is expected that small office units or small B8/B2 units are likely to have greater success in this location.
- 3.39 Masterplans for the site are being progressed and it is expected that the employment land would come forward alongside the residential land which is in trajectory as provision between 2023/24 to 2032/33.

Land east of Broad Road (Straits Mill) (ref f)



Illustrative map showing location of employment land at Land East of Broad Road (purple) (ref:f).

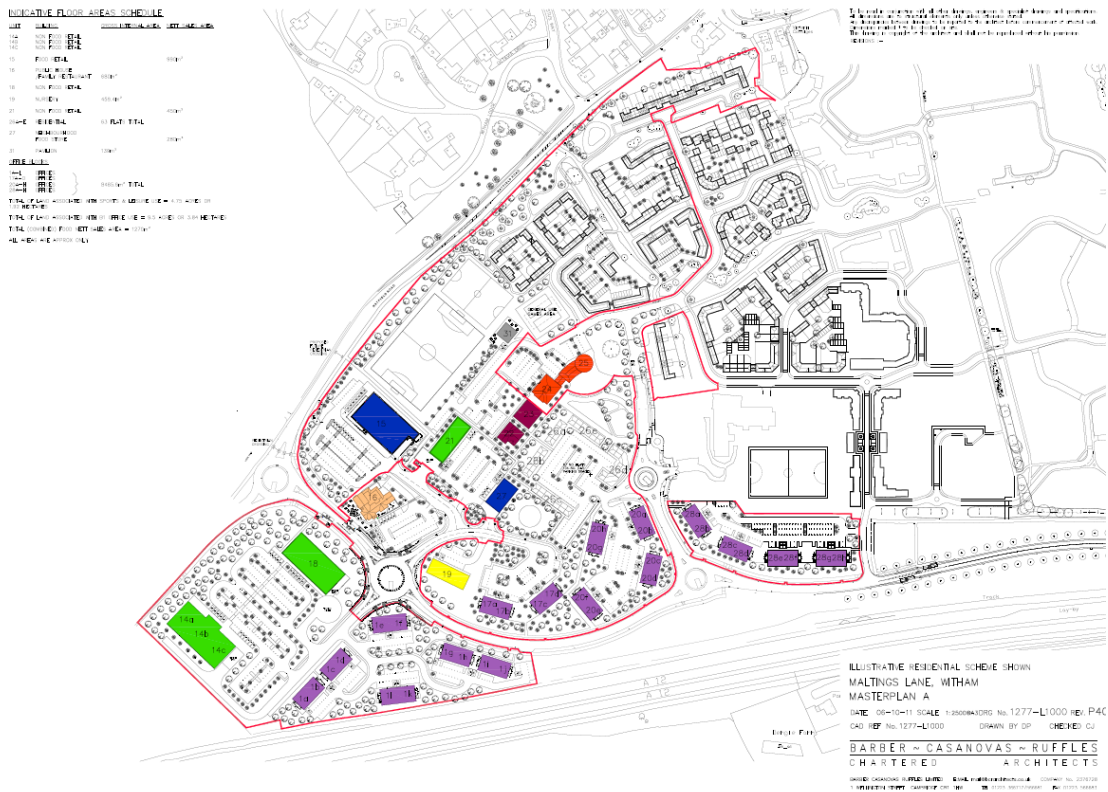
- 3.40 A small cluster of mixed use employment will be provided as part of a large urban extension of 1,000 dwellings to the north east of Braintree. The units will be developed close to the strategic highway on a location adjacent to the sewerage treatment works towards the south east of the scheme. A small part of the site is currently occupied which would be extinguished by the planning application however the higher quality and improved quantity of employment will likely add to the council's economic objectives.
- 3.41 The site has planning permission and the employment land is expected to come forward alongside the residential development which is in trajectory as provision between 2022/33 to 2032/33.

Land at Feering (ref: g)

- 3.42 This is a strategic allocation of 835 dwellings will include a local centre and up to 4ha of employment land to work alongside Threshelfords business park. As such the employment land will be allocated through policy LPP22 Strategic Growth Location – Land at Feering.
- 3.43 Threshelfords is a popular business park which operates at full capacity and is protected by policy LPP7. The allocation here seeks to expand on that success and is fully supported by the developer. It is expected that the successful small office model will be continued on this site and will coexist amicably with residential development. More marginal areas of the SGL could be used for B2/B8 units.
- 3.44 Masterplans for the site are being progressed and it is expected that the employment land would come forward alongside the residential land which is in trajectory as provision between 2025/26 to 2033/34

Maltings Lane (Gershwin Park) Business Park (ref: h)

- 3.45 This employment land allocation retains a series of serviced plots with road access which was constructed in the 2000s as part of a housing-led mixed use urban extension to the south west of Witham. The 2012 update to the masterplan (12/01071/OUT) continues to be the approved framework for development of the remaining four plots which will be a balance between E1 retail, E1 & SG employment and takeaway and C2/C3 residential. Pre-application discussions have taken place with the developer over the intervening period.
- 3.46 ELNA notes that the site is being promoted for 28 office units in this location, B1a/b uses (8,196sqm) as per the 2012 masterplan and this is retained through policy LPP6 however a wider range of employment uses on the site may be possible. Whilst the site has been relatively slow to fully build out, the fundamentals of the site are good – unfettered access to the strategic road network and good links to population centres. Delivery of an all directions junction 21 as part of the A12 widening will likely have a positive effect on development prospects. An enterprise centre will also be delivered as part of the Lodge Farm SGL which could create some synergy for grow-on units at Gershwin Park.
- 3.47 The ELNA recommends retaining this allocation and the Council has adopted this approach.



Illustrative map showing location of employment land at Gershwin Park (purple units) (ref:h).

Do policies LPP 2 to LPP 9 provide clear direction as to how a decision maker should react to a development proposal?

Policy LPP 2 Location of Employment Land

- 3.48 There are two purposes to policy LPP2 which enable the provision of employment land to effectively meet employment need, first the allocation of new employment land and second a generally supportive policy for viable employment units in sustainable locations throughout the district. In the allocation of new employment land, it is clear from the table which proposed uses are expected from each site and each site a) to h) is denoted on the relevant proposals map.
- 3.49 The modifications proposed in MM11 of [SDBDC008a](#), regarding policy LPP2 are necessary to provide clarity for the decision maker given the progress of some allocations (e.g.. Horizon 120 and Springwood Drive), modifications as a result of adopting BLP Section 1, the removal of garden communities and as a consequence of the new use classes order. Minor modifications 7 through 10 are necessary for similar reasons as above and minor modification 6 is wording requested by ECC to guide new development towards providing grow-on spaces as there is an identified shortage of these types of spaces across Essex. This is agreed at paragraph 3.4 of SOCG013 with ECC.

- 3.50 LPP2 (as amended) is therefore clear, justified, effective and consistent with chapter 3 of the Framework.

Policy LPP 3 Employment Policy Areas

- 3.51 Policy LPP3 functions to protect 283.1ha of allocated employment land which is also shown on the Proposals Map. The policy (as amended) clearly sets out the types of land uses that will be permitted on designated land. To improve clarity, the Council has agreed with Historic England in SoCG7 to add references to the proposals map.
- 3.52 The modifications proposed in MM12 of [SDBDC008a](#) (pp5), regarding policy LPP3 are necessary to provide clarity for the decision maker due to the new use class order in September 2020. These modifications will extinguish B1 (Business) Use and replace with a specific definition for the types of business units required to deliver the objectives of the policy instead. There will also be a general restriction placed on permission for new units to change to Class E.
- 3.53 The ELNA found that Braintree District generally has a low vacancy rate for industrial premises so there is a real risk that non-B uses are crowding out core office use, research and development, B2 and B8 uses on designated employment land clusters, thereby reducing their agglomeration effectiveness as well as raising land values. These main modifications are suggested to make the policy consistent with national policy and are justified.
- 3.54 Sport England have commented that LPP3 should allow leisure uses on Employment Policy Areas, this was subject to further discussion during the drafting of SoCG003, however there was no change made and this became an area of disagreement. The Council believes that this issue is dealt with in the implementation of Use Class Order 2020, which allows change of use without a planning application to be submitted for uses such as indoor sports facilities and gyms. Minor modifications numbers 11, 12 and 13 suggest alterations to the supporting text to reflect use class changes.
- 3.55 LPP2 (as amended) is therefore clear, justified, effective and consistent with chapter 3 of the Framework.

Policy LPP 4 Kelvedon Park

- 3.56 This policy clearly allocates a special employment area for use by a specific sector. The allocation also includes an extension of 3.3ha with additional criteria as set out in the bullet points. The allocated land and extension are shown as one area on inset map 50. No modifications to the policy are suggested and the policy is clear, positively prepared, justified and effective as submitted in the Submission Local Plan.

Policy LPP 5 Allshot's Farm, Rivenhall

3.57 This policy clearly allocates an employment policy area on brownfield land in a rural location. Although the site is built and occupied, this policy is retained to guide redevelopment. The allocation is shown as one area on inset map 48. No modifications to the policy are suggested and the policy is clear, positively prepared, justified and effective as submitted in the submission Local Plan.

Policy LPP 6 Business Parks

3.58 Similar to policy LPP3, this policy functions to protect 12.4ha of allocated employment land which is also shaded (but not denoted) on the proposals map. The policy (as amended) clearly states that only business uses will be permitted on designated land. To improve clarity, the Council has agreed with Historic England in SoCG7 to add references to the proposals map.

3.59 Business uses are particularly sensitive to heterogeneous uses with adverse externalities, such as noise and poor environment, and as knowledge economy uses, they risk loss of agglomeration effects.

3.60 The modifications proposed in MM12 of [SDBDC008a](#) (pp5), regarding policy LPP6 are necessary to provide clarity for the decision maker due to the new use class order in September 2020. These modifications will extinguish B1 (Business) Use and replace with a specific definition for the types of business units required to deliver the objectives of the policy instead. LPP6 (as amended) is clear, justified, effective and consistent with chapter 3 of the Framework.

Policy LPP 7 Design and Layout of Employment Policy Areas and Business Uses

3.61 This policy is proposed to be deleted as per MM13 of [SDBDC008a](#).

Policy LPP 8 Rural Enterprise

3.62 This policy provides a set of three (as amended) clear criteria which all need to be met in order to qualify for an exception development. It is designed to support rural diversification and enterprise on a small scale – these types of businesses are described in the supporting text 6.26 to 6.28.

3.63 To improve clarity and effectiveness, policy point a) and b), plus the final paragraph of the policy, is proposed to be removed in accordance with MM15 of [SDBDC008a](#). These modifications remove text that is repeated in other policies of the plan and national policy.

- 3.64 Some regulation 18 consultation responses suggested that the policy wording should include a transposition of paragraph 6.29 to allow unviable employment buildings to change to residential use. Paragraph 6.29 provides context for the final paragraph of LPP8 meanwhile, the intention of this policy text is to allow flexible conversion of buildings in employment use on a small scale - where it is suitable as assessed on a case-by-case basis. Therefore the Council believes the supporting text is the appropriate location and the policy is soundly based and provides clear direction.
- 3.65 Larger scale residential developments must also take into account LPP1 Settlement Boundaries and LPP42 residential conversions of buildings in the countryside. The Council believes that broadening the definition to allow residential reuse of all rural brownfield employment land would lead to unsustainable development.

Policy LPP 9 Tourist Development within the Countryside

- 3.66 This policy should be applied to new developments utilised for the purposes of tourist development, this includes but is not limited to accommodation as described at paragraph 6.33 (camping/caravan sites), other types of accommodation and attractions and facilities in the visitor economy.
- 3.66 Subject to a set of a six (as amended) clear criteria, tourist development in the countryside is permitted. The demonstration of demand (criteria a) and the business plan (final paragraph) requires additional information to be submitted with the application to protect against short term commercial proposals which are later converted into residential dwellings.
- 3.67 To improve clarity and effectiveness, policy point e is proposed to be removed in accordance with MM16 of [SDBDC008a](#) with additional changes designed to improve clarity of interpretation and minor change 15 adds clarity to the definition of major tourism.
- 3.68 The Council therefore considers that LPP9 is clear to the decision maker as to how they should consider proposals for tourist development within the countryside.