

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST11 - Existing Employment Sites			
REF071	Minerals and Waste, NCC	This Policy seeks to protect existing employment sites and several of the listed sites contain permitted waste management facilities. The County Council welcomes this policy which relates to Policy WCS10 of the Waste Core Strategy which seeks to safeguard permitted waste management facilities and potential future sites from sterilisation from other development uses.	Comments noted.
REF092	DHA Planning	<p>Explore Industrial Park - Policy ST11: Existing Employment Sites and Buildings</p> <p>Firstly we support the removal of the EIP site from this policy and its transfer to the more appropriate Policy ST8, as discussed above. However, we note that our previous concerns over the current drafting of part C of the policy have not been addressed. Whilst we continue to have no objection to the main principle here, the wording as drafted may have unintended consequences by preventing otherwise acceptable employment uses. As drafted, this part of the policy states that any change of use or redevelopment to a non-E(g), B2 or B8 employment use would only be permitted where certain criteria are met. It is not currently clear whether all the criteria must be met in order to accord with the policy. As an example of why this matters, it is entirely conceivable that a non-B1, B2 or B8 employment use, such as a sui generis employment use was proposed, which would have the same benefits as a standard B-class use. As worded, the policy would require evidence of 12 months' marketing and a viability assessment, which would seem unnecessary. However, if the word "or" was added to the end of each criterion, in this example it would</p>	Comments noted. Change made accordingly.

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		still accord with the policy as the second criterion would be complied with. We request that the policy is amended in this way.	
REF035	Resident	Policy ST10 – Existing Employment Sites should therefore include Gamston Airport as a fully functioning aviation facility, justified and in accord with the NPPF Section 9, paragraph 104(f).	The Gamston Airfield Business Park is protected by Policy ST11. The remainder of the airfield functions as an operational as a general aviation airfield and is not considered to sit within any of the employment uses classes. The airfield is protected as such by national planning policy.
REF171	Lichfields on behalf of land owner	Policy ST11: Existing Employment Sites As part of our February 2020 submission, we had welcomed draft Policy ST10's support for new and extended employment development, subject to various criteria being met. This has not been carried forward as part of the new Policy ST11 however and, thus, the draft Local Plan is now silent in terms of providing any guidance for new employment development on unallocated sites in non-rural locations or within existing employment areas. To ensure that the policy is effective, the original text from Policy ST10 should be reinstated so as to ensure flexibility in the employment land supply and avoid it being over-reliant on the delivery of proposed allocated sites.	

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REF177	Axisped on behalf of FCC Environment	<p>1.5 ST11 – Existing Employment Sites</p> <p>1.5.1 Policy ST11 has been revised and no longer includes for the provision for new employment development outside of allocated employment sites subject to the development satisfying a number of criteria. The revised supporting text confirms that Policy ST11 enables sustainable economic growth where appropriate outside of the existing employment sites and in the rural area in association with Policy ST12.</p> <p>1.5.2 For the reasons we set out below in our response to Policy ST12, this change is not supported as it no longer provides a policy framework for any employment development within the rural area unless it is for the growth of an existing business. This is not consistent with the NPPF which promotes making effective use of land and supporting a prosperous rural economy.</p>	This comment will be better addressed in response to Policy ST12.