

## Comment

<b>Agent</b>	Mr Philip Rawle (879101)
<b>Email Address</b>	philip.rawle@prp-consultants.com
<b>Company / Organisation</b>	PRP Consultants
<b>Address</b>	Unit 2B, The Tack Room Worcester Road Worcester WR6 6NH
<b>Consultee</b>	Greenlight Developments Greenlight Developments (879102)
<b>Address</b>	Unknown Unknown Unknown
<b>Event Name</b>	Vale of White Horse Local Plan 2031 Part One - Publication
<b>Comment by</b>	Greenlight Developments Greenlight Developments
<b>Comment ID</b>	LPPub3389
<b>Response Date</b>	22/01/15 11:20
<b>Consultation Point</b>	Core Policy 29: Change of Use of Existing Employment Land and Premises ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Email
<b>Version</b>	0.7
<b>Files</b>	<a href="#">APPENDIX 1 (Greenlight Developments).pdf</a>
<b>Q1 Do you consider the Local Plan is Legally Compliant?</b>	No
<b>Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)</b>	No
<b>If your comment(s) relate to a specific site within a core policy please select this from the drop down list.</b>	N/A

**Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

The second section of Core Policy 29, talks about applications elsewhere in the District for the change of use of land or premises that are currently, or were last, used for employment purposes needing to demonstrate that at least one of a series of criteria is met; ranging from, there is no reasonable prospect of the land or premises being used for employment purposes, to the land or premises is unsuitable for business use on grounds of amenity, environmental or highway safety issues. This policy approach is considered to be too onerous when viewed in the context of Paragraph 51 of the NPPF.

Paragraph 51 of the NPPF states that Local Planning Authorities should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in B use classes) where there is a need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.

This is a far more positive approach and the second section of Core Policy 29 needs to be re-drafted to reflect such an approach.

**Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The second element of Core Policy 29 needs to be amended to reflect National policy, notably through the wording contained at Paragraph 51 of the NPPF.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

**Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes - I wish to participate at the oral examination

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

The nature of our representations is strategic and has key implications.