

**Further submissions made on behalf of Ashtenne Industrial Fund Limited (ID 793)**

**POLICIES PLA3, REG1 AND REG2**

**Question 1b**

1. Our short submissions at the deposit stage were narrow in their focus. They asked the plan to include some flexibility that would allow the PLA3 regeneration sites to respond to opportunities and changing conditions over the plan period. The intention was only to allow properly considered schemes with a different land use mix to come forward on these sites.
2. This was the only concern that AIFL had with the deposit plan and we proposed three options: removing the PLA3 sites from REG 1 and 2 control; making it clear that numerical targets for the PLA sites are for guidance only; or adding tests to REG2 to explain where sites could be released from business or industrial uses.
3. We were comforted to see (from the Inspectors note for the session) that the Council recognises the need for flexibility and that other uses or different mixes will be considered when planning applications are made. The addition of text to confirm this in the plan, would go a long way to addressing our concerns. From its latest comments, however, the Council has concerns about removing the PLA3 sites from REG2.
4. In this light we propose a change to REG2 which would make it clear where a release from its terms may be allowed. This would confirm that beyond the sui generis and ancillary activities already specified, development outside class B will only be acceptable where:
  - a) The site is allocated under Policy PLA3
  - b) The potential to deliver or retain employment use has been fully explored by way of marketing for appropriate employment purposes
  - c) The redevelopment of the site will have regeneration and other benefits
  - d) A range and choice of employment uses is maintained
  - e) The proposed alternative use would not prejudice adjoining employment land
5. These criteria reflect practice from a number of other plans (and especially Policy AW11 of the adopted Rhondda Cynon Taff LDP). They do not mean that a presumption will exist in favour of relaxation (the proposed wording makes it clear that the starting point will be protection). Properly applied to the right sites and in the right locations, the wording will however allow the Council to positively shape projects in what all recognise to be sustainable locations. In this context and with the other tests to satisfy as well, the Council can be sure that the best and most effective use of these sites will be made.
6. We see this as a small positive improvement to the plan, which would in no way affect its soundness. It supports the LDPs spatial strategy and ambitions and will leave the Council with the flexibility to capture projects that it otherwise might not. It also reflects practice from elsewhere and the growing recognition at a national and local level that all development activity has an economic dimension and dividend.