

BUSINESS and LOCAL ECONOMY		
REF.	RESPONDENT	COMMENT
13	TWBC	<b>Page 65 BE1:</b> Whilst the intention of the last line of the policy is understood, the latter sentence will potentially be problematic. It can be extremely difficult for a LPA where there are differing views within a community as to whether a matter is of benefit to that community...it can be the case that both parts claim to represent the community. Would the following be more appropriate: " <b><i>so long as they fit the rural, social and environmental principles of the parish, as set out in other policies of the NDP</i></b> "?
35	Gerard Conway	<b>Policy BE1</b> - The plan is a long range plan. It is therefore quite possible that over this period new types of business may grow up due to changes in technology, working practices and other factors. Others may decline. Consequently, no specific industries or employers should in my view be singled out for favourable treatment under the BNDP. The criteria for which businesses have been singled out for favourable treatment under this policy are furthermore unclear. For example " <i>farming and forestry</i> " is one of these. However out of the 979 employees included in the Benenden employees survey (supporting document BEA2) only 20 (i.e. 2%) are employed in farming and forestry. Policy BE1 goes on to state that they will be supported as long as they fit " <i>the rural and environmental principles of the parish</i> ". This statement is clearly open to interpretation and thus carries a significant risk of exploitation. In particular, business related development can lead to significant environmental impacts, such as noise, vibration, dust and other forms of pollution. Such environmental impacts may not be acceptable, where the development site is located in the vicinity of other types of development, such as residential or heritage assets. <b>Recommendation : Policy BE1 should be deleted.</b>
40	Tony Fullwood	<b>Policy BE1:</b> Suggest supporting development related to farming and forestry for which a rural location is demonstrated and necessary
40	Tony Fullwood	<b>Policy BE?</b> Given their economic importance, you may wish to consider an additional policy which allows for the expansion of Benenden Girls School and Benenden Hospital provided certain criteria are met.
13	TWBC	<b>Page 68, para 4.10.1</b> - May want to refer to paras 6.443 - 6.459 and Policy ED5 of the TWBC DLP to future proof the NDP.
13	TWBC	<b>Page 68, Policy BE2:</b> If the intention is to ensure that buildings are re-used mainly for economic purposes rather than residential, it may be relevant for this policy to be strengthened.
35	Gerard Conway	<b>Policy BE2</b> - The conversion of previously developed land and redundant buildings and / or their change of use for business purposes can equally lead to significant environmental impacts, such as noise, vibration, dust and other forms of pollution. Such environmental impacts may not be acceptable, where the development site is located in the vicinity of other types of development, such as residential or heritage assets. Furthermore, this draft policy BE2 is subject to a similarly loosely worded caveat, which states that development will " <i>sustain the balance between housing and commercial provision</i> ". It is not clear what this is intended to mean. Consequently it may be prone to exploitation. For example, it could mean that the redevelopment of brown field sites may occur to provide housing and/or business premises. Alternatively it could imply that the plan favours the loss of residential amenity to allow brown field sites to

		be redeveloped for an intensive business use (that for example generates noise). <b>Recommendation : Policy BE2 should be deleted.</b>
40?	Tony Fullwood	<b>Policy BE2:</b> Suggest redevelopment and regeneration of existing business sites and redundant buildings for business use.
13	TWBC	<b>Page 68, Policy BE3:</b> As it can be problematic if a business closes down and there isn't appetite by others to purchase the site, the usual approach in planning policy is set out that residential development of such sites would only be permitted if a series of criteria have been met. Such an approach has been applied to tourist accommodation under Policy ED7 on page 475 of the DLP; it may be pertinent for the NDP to follow a similar approach.
13	TWBC	<b>Page 69, Policy BE4:</b> Will be necessary to define "significant"; suggest provide more details (eg in supporting text) on what a "detailed infrastructure impact assessment and a plan to deliver requirements" involves; this is a very interesting and potentially very useful approach and really puts the emphasis on the applicant. As it stands, it is considered that significant additional justification is necessary for this policy, but (as above) is potentially very important.