Dear Sir or Madam

Local Plan Part 2: Sites and Development Management Examination
Main Modifications Consultation
Burt Boulton Holdings Limited

We write on behalf of Burt Boulton Holdings Ltd in relation to the latest round of public consultation on the Local Plan Part 2. WYG has previously appeared at the Examination into the soundness of the Plan and these representations provide further comment following the Council’s modifications to the draft Plan.

TOT11: Eling Wharf (MM29)

Policy TOT11 has been subject to further amended wording within the Main Modifications. WYG has previously suggested amendments to the wording of this policy within the submitted Examination Statement. In some instances the suggested wording has not been carried through to the amended policy and so comments made at the previous stage of the consultation still, stand. In summary, these are:

1. The development of the site should seek to site “should seek to maximise the quantum of primarily for employment development” rather be “primarily for employment” recognising the now accepted requirement for flexibility to ensure a viable development comes forward. This amendment should be carried through both within the first sentence and the first bullet point which set out the site-specific criteria.
2. The policy should not specify the location of housing within the list of site-specific criteria and therefore the reference to residential being located on the western part of the site should be omitted to allow for the flexibility to ensure a viable development comes forward. This also conflicts with the added wording at bullet four, which states that residential development will be acceptable in the southern part of the site adjoining Eling Quay (as part of a mixed use scheme). The purpose of TOT11 should be to identify potentially suitable land uses in order to promote a viable development. It should not seek to pre-determine the location and layout of uses within the site.

3. The policy should recognise that the eventual scheme may include a wider mix of uses and this should be reflected in bullet 3 which should state that primary access to “non-residential” areas should be from the A35 rather than the “employment areas”.

In terms of the main modifications, we support the insertion of wording stating that town centre uses may be considered subject to the sequential test and other assessments required by national or local policy.

**DM14 (MM20)**

We support the removal of Policy DM14 from the Local Plan.

**TOT18: Rumbridge Street Secondary Shopping Frontage (MM33)**

We support the amendments to TOT18 to ensure that there is consistency with the NPPF’s terminology subject to the necessary amendments to the Local Plan Proposals Map. This will require an amendment to ensure that Rumbridge Street forms part of the Town Centre’s shopping frontage, which itself should be designated as “Primary Shopping Area” within the forthcoming amendments to the Proposals Map.

Yours Sincerely,

Gary Morris

**Director**

For and on behalf of WYG