

Inspector's Question 77

I would welcome the Council's observations on representation 1498 from Sarah Butterfield of WYG on behalf of Corbally (Finmere) Group and Mrs Vanessa Tait, 1522 from Reece Lemon of Savills Oxford on behalf of Lands Improvement Holdings, 2029 Jon Gateley of Savills Southampton on behalf of Crest Strategic Projects concerning policy D5.

AVDC Response

The key issues raised in the specified representations have been extracted and the Council's response to them is set out in the table below.

Agent	Respondent	Key Issues	Response
Savills Southampton (Mr Jon Gateley)	Crest Strategic Projects	<i>Policy is weaker than preceding supporting text. Does not set out provision on how existing employment land will be protected. Fails to recognise other employment sites in district, notably RAF Halton. Contradicts Bucks HEDNA (2016) paragraph 34 of the Executive Summary (lack of B1c/B2 sites across FEMA). Failure to protect other employment sites is inconsistent with NPPF 'economic' dimension of sustainability and risks reinforcing commuting out of Aylesbury Vale. Should include principles regarding B1, B2 and B8 uses in policy.</i>	<p>The supporting text is intended to be read in conjunction with the policy and so it would be unnecessary to repeat all of the principles of the supporting text within the policy. Policy E1 also specifies use classes B1, B2 and B8 as being permitted within the key employment sites.</p> <p>As set out in more detail in the council's employment topic paper the sites allocated in policy D5 exceed the employment land requirement within the Plan, with five of these sites listed as containing either or both B1 and B2 use classes and Hampden Fields specifically containing B1c use. Therefore the policy is consistent with paragraph 34 of the Bucks HEDNA (2016) and the NPPF 'economic' dimension of sustainability.</p>
WYG (Sarah Butterfield)	Corbally (Finmere) Group and Mrs Vanessa	<i>Policy does not reference the need to make effective use of land. When considering</i>	Effective use of land is covered by policy S7 and its supporting paragraph 3.67 references the

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	Tait	<p><i>rural areas, policy should take into account development of previously developed land, which is permissible. The September 2012 Employment Land Review Update, paragraph 9.3, identifies that 50.1 ha of employment land should be provided over the plan period, which is not reflected in the 27 ha allowed in the Plan. Expect the Council's position to reflect surplus indicated in figure 8.5 but paragraph 8.25 considers significant supply from two locations considered to be specialist provision. Land at Finmere Airfield could provide alternative premises for local employment at Tingewick Road Industrial Estate, which was found not fit for purpose in qualitative assessment in ELRU.</i></p>	<p>introduction of permitted development rights in 2015. These development rights have since been permanently implemented, however they do not cover all types of previously developed land and use classes. The Council will, however, amend this paragraph to reflect up to date information on permitted development rights.</p> <p>The representation ignores paragraphs 8.27 and 9.9 which suggests up to 30 ha as a more realistic level of employment land to plan for, based on the potential for development land at Silverstone to support high quality employment in certain sectors. This is supported by the inclusion of policy E10 Silverstone Circuit in the Plan.</p> <p>The review of the Plan will assess existing employment land as well as supply vs demand in the district and, if necessary, will consider alternate and additional sites.</p>
Savills Oxford (Reece Lemon)	Lands Improvement Holdings (LIH)	<p><i>Policy D5 supports expansion of existing employment premises. However there could be instances where expansion of existing employment areas is required to cater for demand, for example at Haddenham Business</i></p>	<p>The extension of an employment area has the potential to be significantly more strategic than that of an individual premises and could require a high level assessment to determine the suitability and sustainability of the</p>

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		<p><i>Park. The policy should be revised to include reference to such development: b. through the intensification or extension of existing premises or existing employment areas...</i></p>	<p>additional area. The suggested amended wording could therefore lead to significant levels of inappropriate development.</p>