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Ret 57

12 May 2010
Cov Letter Repts 12 May 2010.doc

savills

By Email

Planning Policy Manager
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Dear Sir or Madam,

South Bucks District Council – Publication Stage Representation

Please find enclosed representations submitted on behalf of Land Securities Plc in relation to the following policies:

- Core Policy 10
- Core Policy 11

Please could you confirm receipt of these representations and let me know if you require a hard copy.

Please do not hesitate to contact me should you have any queries.

Yours faithfully

Mary Power
Director



South Bucks
District Council

**South Bucks Core Strategy
Development Plan Document (DPD)
Publication Stage Representation Form**

Ref:
57
(For official
use only)

Name of the DPD to which this representation relates:

South Bucks Core Strategy

Please return to South Bucks District Council, by 5pm on Wednesday 12th May 2010

By post to: Planning Policy Manager, South Bucks District Council, Capswood, Oxford Road, Denham, FREEPOST SCE9630, UB9 4BR or

By e-mail to: LDF@southbucks.gov.uk or

By fax to: 01895 837269

If you have any queries, please contact the Planning Policy Team on 01895 837200.

This form has two parts -

Part A - Personal Details

Part B - Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details* See note below 2. Agent's Details (if applicable)

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	<input type="text"/>	<input type="text" value="MS"/>
First Name	<input type="text"/>	<input type="text" value="MARY"/>
Last Name	<input type="text"/>	<input type="text" value="POWER"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="DIRECTOR"/>
Organisation (where relevant)	<input type="text" value="LAND SECURITIES"/>	<input type="text" value="SAVILLS PLC"/>
Address Line 1	<input type="text"/>	
Line 2	<input type="text"/>	
Line 3	<input type="text"/>	
Line 4	<input type="text"/>	
Post Code	<input type="text"/>	
Telephone Number	<input type="text"/>	
E-mail Address (where relevant)	<input type="text"/>	



Important: Please note that your comments and personal details will be available for public inspection and therefore cannot be treated as confidential. Please make sure that you only give information that you are happy for others to see.

Part B - Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the DPD does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the DPD is :

4.(1) Legally compliant Yes No

4.(2) Sound Yes No

If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Core Policy 10 was drafted before the publication of PPS4 Planning for Sustainable Economic Growth. It therefore does not reflect the definition of economic uses, which provide employment opportunities, wealth or economic output, based on the key Government objective to achieve sustainable economic growth in sustainable locations.

The Policy as drafted will apply to all existing employment 'B' use class buildings and sites and therefore does not comply with PPS4, which contains proactive policies to stimulate mixed use employment generating uses. It does not allow the flexibility to consider the site specific circumstances of sites/buildings and alternative employment generating uses which may increase the economic wealth and output.

The criteria of the Policy should not apply to non-allocated employment 'B' use class sites.
(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

Core Policy 10 should be re-drafted to reflect PPS4 including:

- Reference to subsequent Site Allocations/DPD documents which will identify/allocate strategic/locally important employment 'B' use class sites, with a presumption in favour of protection and growth.
- Criteria to assess all other employment 'B' use class sites in terms of their potential output for job, wealth and economic output.
- Reference to other sustainable development criteria including, public transport,

housing and other social and community facilities

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, 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.

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

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

Land Securities' representations raise issues of significant importance that question the soundness of the plan. We therefore request participation in the oral examination to ensure our case can be fully made and subject to questions by the Inspector as appropriate.

(Continue on a separate sheet / expand box if necessary)

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.

Signature:

Date:

12/05/2010

Thank you for your comments.

We also encourage you to complete and return the Equal Opportunities Monitoring form to help us to monitor inclusivity. The information collected on this form will not be attributed to you, as you don't have to provide your personal details.

Notification Request

Please complete the following if you wish to be notified of any of the following:

I request to be notified of

The submission of the Core Strategy for independent examination

The publication of the recommendations of any person appointed to carry out the independent examination of the Core Strategy

The adoption of the Core Strategy

Please specify the address to which the notification should be sent to if it is different from the one given in the front page.



South Bucks
District Council

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Core Policy 11 contains specific convenience and comparison retail floorspace figures in respect of the Bishops Centre, which we do not accept. The appropriate level of growth and acceptable retail floorspace related to the welcomed support given to the redevelopment of the Bishops Centre, will be more appropriately determine in the context of a planning application for redevelopment of the Centre. An analysis of the Bishops Centre catchment area and addressing PPS4 Policy criteria for growth of the Centre can then rigorously assess the Centre's catchment and growth potential, which is acknowledged by the Council and its consultant NLP (see evidence base Retail and Town Centre Study Update Dec 09) to be wider than the district boundaries.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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 table of additional growth floorspace figures for convenience and comparison retail should be deleted from Core Policy 11.

On Page 35 and the green box referring to Burnham the floorspace figures should also be removed from this paragraph and replace with "which will be determined in response to any submitted redevelopment proposals and assessment of the centres catchment and growth potential / impact in accordance with PPS4 Policies".

(Continue on a separate sheet /expand box if necessary)

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Signature:

J. S. S.

Date:

12/05/2010

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