1) The Framework 2018 introduced two significant changes to national planning policy for economic development namely:

- Ascribing the weight that is to be placed on the need to support economic growth and productivity

- Introducing the issue of ‘productivity’ as a material planning consideration.

2) This change in national planning policy is relevant to the preparation of this Part 2 Local Plan, albeit the Plan is to be examined against the Framework 2012. The planning policies which underpin the overall planning objective for Building a strong, competitive economy remain largely unchanged between the 2012 Framework and 2018 Framework (2012;(21); 2018(81). It is a fundamental objective for policies to ‘proactive encourage sustainable economic growth’. In this context positive and proactive participation is presently being undertaken between db symmetry and to senior development management officers at SNC regarding the release of land on the west side of M40 for employment development – as a logical extension of the successful Central M40. A plan identifying this location is attached to these submissions. A development plan can never anticipate each and every circumstance where development may be acceptable. Hence in preparing policies that should be positive and proactive towards sustainable economic growth the accompanying criteria should be sufficient flexibility to allow for these ‘windfall’ opportunities; particularly in the circumstance of extensions to existing employment sites. Policy EMP 3(2) New Employment Development does not facilitate the logical expansion of existing employment sites in the context of the underlying principle that the ‘planning system does everything it can to support sustainable growth (Framework 2012 (19) is considered inconsistent with national planning policy.
3) It is submitted that the Plan would be consistent with national planning policy with the addition of:

- ‘or’ after the criterion iii, and the inclusion of a fourth criterion.

- The expansion of an existing employment site where such development is acceptable against other policies set out in the development plan.

4) This criterion would not mean that the expansion of existing employment site was necessarily acceptable, but properly would require a planning balance to be undertaken within the development management process. The development plan would properly provide the underlying policy support for expansion of existing employment site which is consistent with the Government’s Commitment to support sustainable economic growth. In giving ‘significant weight’ to support economic growth there may be individual site circumstances where the applicator of other policies set out in the development outweigh the benefit from expansion, and in planning permission should be refused. The additional criterion to policy EMP3 provides the appropriate planning context for economic development which is consistent with the Framework 2012, and endorsed by the Framework 2018.