

Inspectors Question 53 Employment Land Provision

I would welcome the Council's observations on the representations by Tim Burden of Turley on behalf of SEGRO PLC and Matthew Dauber of Savills on behalf of the Berryfields Consortium on employment land provision.

Summary of representations

1085 Tim Burden of Turley Associates on behalf of SERGO PLC

- *Lack of substance to justify Aylesbury District meeting the purported 'unmet needs' of the southern authorities with respect of employment lands provision.*
- *Concern that AVDC is unlikely to meet the B8 requirements of the FEMA, on account of its poor strategic connectivity and with explicit reference to the District being unlikely to meet warehousing requirements over the plan period.*
- *Portfolio of sites available is limited, unlikely to be deliverable. The site selection and sustainability assessment process is flawed and unsound*
- *Concern that the Buckinghamshire Authorities have appropriately co-operated on strategic priorities, with regard to employment needs, subsequently failing to ensure that such priorities are 'properly co-ordinated and clearly reflected in individual Local Plans'.¹*
- *AVDC and WDC should review the position being adopted to ensure that both plans fully reflect 'an economic vision and strategy for their extra which positively and proactively encourages sustainable economic growth'¹*
- *VALP would fail to meet para 181 and 182 of NPPF*

2666 Tim Burden of Turley Associates on behalf of SERGO PLC

- *Reference is only made at paragraph 4.10 of the Plan to the Enterprise Zones at Silverstone, Westcot and Arla/ Woodlands.*
- *Potential for employment provision to come forward through a number of the strategic sites around Aylesbury contained within the Local Plan. Questioning the appropriateness of these sites for employment alongside timescales for their delivery.*
- *Concern regarding AGT 5 site requirement for employment*

1106 Matthew Dauber Savills on behalf of the Berryfields Consortium

- *The approach taken for Aylesbury Vale to use its surplus land to make up the shortfall within the southern districts is acceptable in terms of the provision of housing across a Housing Market Area, as there are fewer locational and site specific requirements that for employment. However, the land area and location required for different B-use classes varies greatly.*
- *The development of employment allocations is highly dependent on the suitability of the location. For example B8 uses are typically highly dependent on close proximity to major road infrastructure. In the case of the Bucks FEMA this comprises the M40 and, to a lesser extent, the M25.*
- *Concern that Aylesbury is located some distance from major road infrastructure compared to southern districts. This may be deemed as less attractive for B-uses which are dependent on frequent deliveries by road.*

- *Limited up take of areas of Berryfields designated for employment uses. Those areas that are currently in employment generating use are limited to A class retail uses, rather than B class uses. Confirmation of lack of market interest.*
- *9 hectares of employment land have been the subject of outline planning consent for 10 years, without significant interest for development for B-use classes. Some employment generating uses have been provided on the site, including a A3 restaurant, however, this is somewhat short of the significant levels of employment envisioned when the planning application was consented and which underpins policy D-AGT5.*
- *Reaffirmation of the levels of employment consented as part of the outline scheme as part of the Local Plan is not justified by evidence within the HEDNA nor would it deliver an effective delivery strategy given that it is unlikely to deliver employment development. Allocation of land, which has not attracted sufficient levels of market interest in the last decade, to come forward is against paragraph 22 of the NPPF. This is because past trends suggest that the site is unlikely to come forward to the extent proposed.*

Main three points for rep 1106:

1. *The reapportionment of employment need from Wycombe, South Buck and Chiltern to Aylesbury Vale is not appropriate given the location and site specific requirements for employment land e.g. at Berryfields, no B use class development has been delivered in 10 years since outline consent*
2. *Given the lack of proximity to the M40 of much of Aylesbury Vale does not meet the same criteria as locations in South Buck and Wycombe*
3. *The spatial allocation of employment at levels of need well above that of Aylesbury District itself will not be an effective way of meeting requirements over the FEMA. it doesn't accord with Para 22 of NPPF.*

Responses

- In terms of AVDC meeting the unmet needs of Wycombe and Chiltern and South Bucks in respect of employment provision, AVDC has been working closely with all our FEMA authorities under the Duty to Cooperate requirement on a number of strategic issues. This includes the Economy and the assessment of supply of economic floor space across the FEMA. This included lengthy and detailed discussions with the other Bucks districts about their employment needs and their potential for development. It was agreed that the other Bucks councils had made sufficient effort to identify suitable sites but as with housing allocations enough suitable land could not be identified due to Green Belt and AONB constraints. Under the Bucks MoU signed in July 2017, it was therefore agreed that:
 - the plans should reflect the uncertainties in relation to future economic growth by adopting a precautionary and flexible approach to economic development, including ensuring allocations are flexible to adjust to changes in the market'
 - that the Councils should monitor economic activity and market trends, and address any implications in reviews of local plans as necessary
 - the overall approach across the FEMA broadly delivers sufficient land for economic growth taking into account a range of factors including an element

of redistribution of growth from the three southern districts into Aylesbury Vale to take account of their shortfalls due to their constrained nature.

- Therefore this provides the evidence to demonstrate that AVDC as a local planning authority has effectively cooperated to plan for issues with cross-boundary impacts when our Local Plans are submitted for examination, as required in paragraph 181 and 182 of the NPPF.
- The forecasts developed to inform the employment allocations in the HEDNA have also been called into question due their inconsistency with experience on the ground. Hence the reference to a precautionary approach. However it is considered by the addendum to the HEDNA that apart from Aylesbury there is no other likely marketable location for B8 developments in relation to competing sites in surrounding areas.
- AVDC has a clear vision for the Plan in relation to employment which is to ensure the availability of a diverse and flexible range of employment opportunities for new and existing businesses, which match the expectations for employment growth in the district. To support this there is a need to maintain a flexible supply of employment land and premises. A range of employment uses are required to ensure sustainable economic growth and the Employment Land Review identifies a list of varied existing and potential employment sites throughout the district.
- Regarding the districts strategic connections raised in reps 2666, 1085 and 1106, Aylesbury Vale is considered to have reasonable links to the major road networks such as the M40 to the west, the M25 to the south and the M1 to the east via a number of strategic routes from Aylesbury as well as other strategic settlements, and the infrastructure delivery requirements for the VALP set out a number of opportunities to improve these connections. Due the growth needs of Aylesbury Garden Town and the wider Aylesbury Vale area, it does not make sense to restrict levels of employment land requirements such as B8 uses, as this would conflict with the plan vision to ensure we do everything to support sustainable economic growth as well as housing growth. AGT will help to deliver employment across arrange of sites to meet a wide range of employment needs in the most sustainable locations to support and complement housing growth and produce mixed use development, and the proposed link roads as set out in the Infrastructure Delivery Plan will provide north/south and east/west connectivity opportunities.
- Within the VALP, the plan references the Enterprise Zones in paragraph 4.10, as well as Table 9 of Key employment sites which are protected under policy E1. There also a number of other protected sites within or in close proximity to Aylesbury Garden Town under policy E1 including Triangle Business Park, Gatehouse Industrial Area, Rabans Lane/Coldharbour Industrial Area and Halton Brook Business Park. Additionally the VALP provides a positive position for other employment sites under policy E2 and the supporting text, stating that outside key employment sites, the redevelopment and/or reuse of employment sites to an alternative employment use will normally permitted provided they meet the criteria set out in the plan. Other employment sites includes Aylesbury town centre and Stoke Mandeville Hospital, as well as setting out a flexible approach to facilitating a broad range of economic development.
- Berryfields is identified in the VALP as a strategic allocation for Aylesbury and forms part of the Aylesbury Garden Town. AVDC notes the concerns raised by rep 1106

regarding the potential lack in market interest in the site for employment uses however as highlighted in the representation, there are A class retail uses on the site and that there has been some interest for development of B-use classes, although not considered significant. Once the VALP is adopted, AVDC will have a robust local plan in place to help provide an additional level of certainty to landowners and developers regarding the role and position of Berryfields within the Garden Town. The vision of the VALP also focusses on ensuring the availability of a diverse and flexible range of employment opportunities, of which AGT-5 is an important element. The VALP states that it is important to maintain a flexible supply of employment land, with plan providing the opportunity for sites not fit for purpose, to be considered for release to other uses. Berryfields is not included as a protected key employment site in policy E1, and therefore this site is considered to accord to paragraph 22 of the NPPF and therefore can offer a flexible approach to employment uses in terms of managing market signals. Additionally paragraph 6.8 of the VALP states that where there is no reasonable prospect of an employment site being used for employment purposes, alternative uses may be considered. The spatial strategy for growth includes the provision of 27 hectares of employment land as set out in the HEDNA, as well as the additional provision for some employment land to contribute to the needs of the wider economic market area, as agreed in the Buckinghamshire MoU with Wycombe and Chiltern/South Bucks districts. The oversupply is also to be retained to potentially meet expected future need for employment land rather than lose suitable sites only to find that new sites need to be found in the near future for the local plan review.

- Lastly AVDC would argue that promoting healthy, vibrant communities remains a key element of planning policy within Aylesbury Vale and in this context the original sustainable concepts behind the allocation of the Berryfields MDA as set out in the 2004 Local Plan remain relevant through to time the development is completed. It is proposed therefore to retain the original employment and local centre allocations in this Local Plan and remain committed to the original Berryfields concept.