



Proposed Submission Vale of Aylesbury Local Plan (Regulation 19)

Employment Topic Paper

November 2017

Introduction

1. This topic paper aims to provide a clear explanation for the approach to employment land provision in the Vale of Aylesbury Local Plan (VALP). It summarises the background, context and evidence which has informed the drafting of employment related policies or is otherwise relevant and outlines the overall strategy for accommodating new employment uses, allocation of strategic sites, and the approach to planning applications.
2. In the Local Plan employment land comprises commercial and industrial uses falling into use classes B1 (a, b and c), B2 and B8 of the Use Classes Order 1987 (as amended). It excludes offices provided mainly to visiting members of the public that fall within the A2: Financial and Professional Services use class. Retail uses are considered in a separate topic paper.
3. This topic paper relates to the following VALP policies set out in the proposed submission plan:

S2 Spatial strategy for growth (employment land related element)

D1 Delivering Aylesbury Garden Town (employment aspect)

D5 Provision of employment land

D6 Town, village and local centres to support new and existing communities (employment aspect)

E1 Protection of key employment sites

E2 Other employment sites

E3 Ancillary uses on employment land

E4 Working at home

E10 Silverstone Circuit

Employment aspects of allocations policies D-AGT3: Aylesbury north of A41; D-AGT4 Aylesbury south of A41; D-AGT5: Berryfields; D-AGT6: Kingsbrook; D-NLV001: Salden Chase

4. The paper should be read with the following documents:

Housing & Economic Land Availability Assessment (January 2017)

Employment Land Review Update 2012

Housing Market Areas and Functional Economic Market Areas in Buckinghamshire and the surrounding areas (2015)

HMA's and FEMAs in Buckinghamshire: Updating the evidence: Further analysis of data from the 2011 Census (June 2016)

Buckinghamshire HEDNA Update Final Report (December 2016)

Buckinghamshire HEDNA Update Addendum (September 2017)

National Policy Context

6. The National Planning Policy Framework (NPPF) with regard to Local Plans and the economy tells us that:

Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system (NPPF paragraph 19).

To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century (NPPF paragraph 20).

Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should:

- set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
- set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;
- plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;
- identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and
- facilitate flexible working practices such as the integration of residential and commercial uses within the same unit. (NPPF paragraph 21)

Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities (NPPF paragraph 22).

Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:

- allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;
- allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;
- set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres (paragraph 23).

Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

- support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;
- promote the development and diversification of agricultural and other land based rural businesses;
- support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and
- promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship (NPPF paragraph 28).

Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should:

- work together with county and neighbouring authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market; and
- work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability (paragraph 160).

Local planning authorities should use this evidence base to assess:

- the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development;
- the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs. Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land;
- the role and function of town centres and the relationship between them, including any trends in the performance of centres;
- the capacity of existing centres to accommodate new town centre development;
- locations of deprivation which may benefit from planned remedial action; and
- the needs of the food production industry and any barriers to investment that planning can resolve (paragraph 161).

7. The Localism Act 2011 places a legal duty to cooperate on all councils. The duty extends to prescribed bodies and neighbouring councils.
8. National Planning Practice Guidance (NPPG) gives advice on housing and economic development needs assessments and housing and economic land availability assessments. With regards to assessing economic development uses the PPG advises (Paragraph: 032 Reference ID: 2a-032-20140306) plan makers to consider forecasts of quantitative and

qualitative need, to estimate the scale of future needs. In carrying out this assessment plan makers are advised that they should consider:

- Sectoral and employment forecasts and projections (labour demand);
 - Demographically derived assessments of future employment needs (labour supply techniques);
 - Analyses based on the past take-up of employment land and property and/or future property market requirements;
 - Consultation with relevant organisations, studies of business trends, and monitoring of business, economic and employment statistics.
9. NPPG explains the role of the HELAA as a key piece of evidence to inform Local Plan preparation. Paragraph 003 (Reference ID: 3-003-20140306) states: “It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.” The PPG indicates what inputs and processes should lead to a robust assessment of land availability (paragraphs 5 to 33). Paragraph 010 (Reference ID: 3-010-20140306) advises local planning authorities to consider economic development on sites of 0.25ha (or 500m² of floor space) and above.

Local context

10. The latest Government figures indicate there are 75,000 employee jobs in Aylesbury Vale.¹ Unemployment among residents, at 3% (July 2016 to June 2017) is significantly lower than the level for Great Britain as a whole (4.6%).² Average earnings of residents are higher than across the South East region or Great Britain. According to the 2011 Census 35,025 residents commute out of the district to work (predominantly to areas just outside the district, but also further afield such as London).
11. Aylesbury Vale falls within the Oxford to Cambridge Arc. Proposed infrastructure improvements, such as East West Rail, the Oxford-Cambridge Expressway and strategic link roads around Aylesbury, will dramatically improve connectivity, allowing greater access between housing and employment and potentially unlock further opportunities for economic growth in the future as well as supporting existing planned growth.
12. Two Local Enterprise Partnerships cover the district: Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) and South East Midlands Local Enterprise Partnership (SEMLEP). BTVLEP covers Aylesbury Vale, Wycombe, Chiltern, and South Bucks. Local Enterprise Partnerships have a key role to play in delivering local growth by directing strategic regeneration funds and in providing economic leadership through their Strategic Economic Plans. They are among the bodies which local planning authorities are expected to co-operate with on strategic, cross boundary issues in preparing their Local Plan under the Duty to Co-operate.

¹ ONS Business Register and Employment Survey 2016
[/www.nomisweb.co.uk/reports/lmp/la/1946157291/report.aspx#tabjobs](http://www.nomisweb.co.uk/reports/lmp/la/1946157291/report.aspx#tabjobs)

² [/www.nomisweb.co.uk/reports/lmp/la/1946157291/report.aspx](http://www.nomisweb.co.uk/reports/lmp/la/1946157291/report.aspx)

13. Priorities set out in **Buckinghamshire Growth Strategy 2017-2050** (BTVLEP, September 2017) are to:

- Ensure that economic prosperity drives future growth in Buckinghamshire.
- Increase the value of the local economy from £15bn per annum to £35bn per annum by 2050, a £4.5bn increase over a business as usual scenario.
- Enable the constituent parts of the Buckinghamshire economy work together, strengthening the economic ecosystem and capitalise new regional growth opportunities.
- Address housing, infrastructure and skills constraints on growth.

Aylesbury Vale Economic Development Strategy 2016-2033 (September 2016)

14. The Economic Development Strategy sets out a vision for Aylesbury Vale as a vibrant dynamic business location by 2033, summarises progress on the VALP and on economic development strategy objectives and identifies building blocks for the strategy and priority actions for 2015-2018.

Aylesbury Vale Enterprise Zone

15. In 2015, three sites in Aylesbury Vale secured Enterprise Zone status. The designation followed a successful application by Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP), supported by Aylesbury Vale District Council, Buckinghamshire County Council, landowners and site developers. The three sites are Westcott Venture Park, Arla/Woodlands and Silverstone. The Enterprise Zone designation covers around 96 hectares of commercial land with the potential to create 8,000 new jobs (source: news release, BTVLEP). The overarching strategy is to stimulate the development of emergent growing sectors – high performance technologies and motorsports at Silverstone, space propulsion at Westcott and environmental technologies and food and drink manufacturing and human health focused at Arla/Woodlands. Westcott and Silverstone are existing employment sites and already have roles in scientific research and high tech engineering. Further information about the Enterprise Zone is available here <http://aylesburyvaleez.co.uk/>.

Aylesbury Garden Town

16. In January 2017 Aylesbury was awarded “Garden Town” status. This follows a successful bid by AVDC and partner organisations in October 2016. The new status, together with funding, will support the delivery of new communities at Aylesbury, help ensure that growth comes forward in the best possible way: and that high quality and design are embedded in new development and enable a cohesive, comprehensive approach to planning for growth. Work has begun on a masterplan for Aylesbury which will enable a overarching plan to guide the town’s future growth. The identification of Aylesbury as a Garden Town recognises Aylesbury’s role as the county town for Buckinghamshire and its central location in ‘the brain belt’.

VALP Evidence base

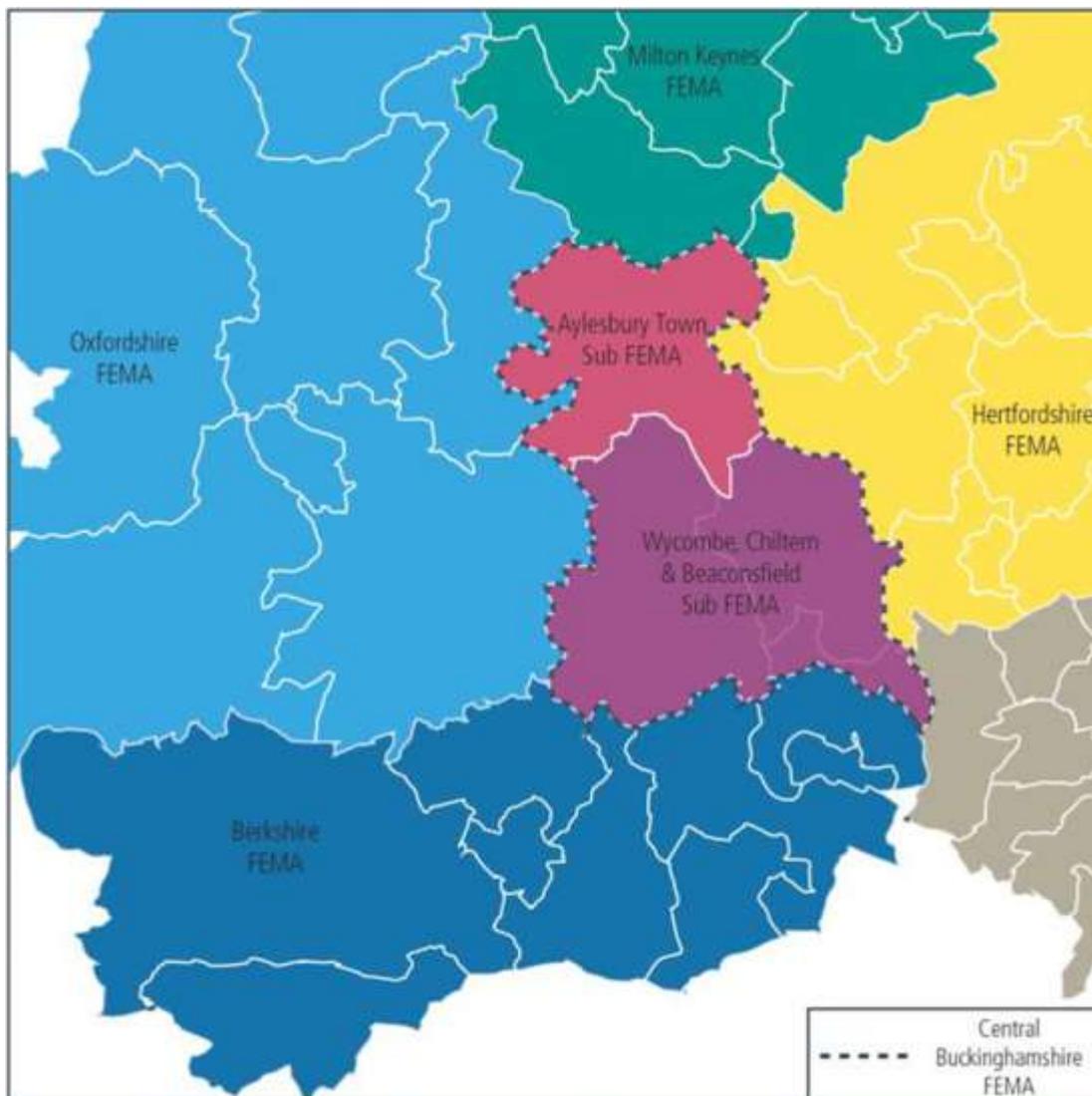
17. National Planning Policy requires us to develop policies based on up to date evidence. Our evidence base comprises documents that have helped inform the development of our Local

Plan. Employment related evidence is summarised in the following paragraphs. Further information and copies of the evidence base documents are available on the Council's website.

Functional Economic Market Area (FEMA)

18. National Planning Practice Guidance states that local planning authorities should assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate. To this end, Opinion Research Services (ORS) and Atkins were commissioned to prepare a report to identify Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) for Buckinghamshire County and surrounding areas (*Housing Market Areas and Functional Economic Market Areas in Buckinghamshire and surrounding areas* March 2015). This work was reviewed and updated in 2016 to take into account commuting and migration data subsequently published by the ONS.

Figure 1 Functional Economic Market Areas (source: Buckinghamshire HEDNA figure 5)



19. *HMA*s and *FEMA*s in Buckinghamshire: *Updating the evidence* recommends adopting a pragmatic “best fit” approach to defining the *FEMA* for Central Buckinghamshire based on Local Plan Areas. The resulting geographic area comprises: Aylesbury Vale, Chiltern, Wycombe and South Bucks local authority areas. The majority of Aylesbury Vale District is covered by the Aylesbury Town and the Milton Keynes Sub-*FEMA*s (figure 1). While other functional *FEMA*s cover parts of Aylesbury Vale including those relating to Banbury, Luton, Oxford and South West Hertfordshire, these areas are less densely populated so do not play a significant role in the economy of Aylesbury Vale. A large part of South Bucks falls within West Berkshire *FEMA* but Chilterns and South Bucks are preparing a joint Local Plan and the inclusion of South Bucks within the Central Buckinghamshire *FEMA* is to reflect that fact. The best fit approach based on local authority areas has been agreed through a Memorandum of Understanding (July 2017).
20. The economic needs for the *FEMA* and each Council area have been established through the jointly commissioned Bucks HEDNA, HEDNA update (December 2016) and Addendum (September 2017).

Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA)

21. The HEDNA identifies the needs for new jobs and homes up to 2033. A draft of the Central Buckinghamshire HEDNA was published for consultation in autumn 2015 and identified a need for 22 hectares of employment land in Aylesbury Vale (broken down as +12 hectares of B1a/b -7 hectares of B1c/B2 and 18 hectares of B8) – over the plan period 2013-33). A Buckinghamshire HEDNA was published in January 2016, following the decision of South Bucks and Chiltern Districts to produce a joint Local Plan. An update to the HEDNA, published December 2016, takes account of more recent data, including economic forecasts produced by Oxford Economics and Experian.
22. To calculate the projected change in demand for employment land (B uses), the HEDNA considered three growth scenarios: Experian, Oxford Economics and Trend-based. Demand under the different scenarios varies. For example, trend based and Oxford Economics scenarios show a fall in demand for B1c/B2, whereas Experian shows an increase. All three scenarios project an increased demand for B1a and B1b floorspace, summarised in Table 1 below.
23. Oxford Economics and Experian forecast future growth in employment by taking account of past growth in employment by sector and expected future performance of different B use class sectors of the economy. They then apply densities and plot ratios in order to convert the job forecasts to land requirements. Further detail on this is given in the HEDNA Update (pages 128-129 and Appendix D).
24. Taking into consideration the market analysis, stakeholder consultation and review of past employment floorspace gains and losses, the HEDNA recommends the Oxford Economics growth scenario be used. For Aylesbury, this results in an overall need for 27 hectares of employment land (16 hectares of B1a/b, -6 hectares of B1c/2 and 17 hectares of B8).

Table 1 Oxford Economics Forecasts, Experian Forecasts and past trend based projections (Aylesbury Vale)

	Oxford Economics			Experian			Trend based		
	2013	2033	Change 2013-2033	2013	2033	Change 2013-2033	2013	2033	Change 2013-2033
B1a/b	243,000	322,600	79,600	262,600	309,300	46,700	263,000	367,000	105,000
B1c/B2	175,000	149,100	-25,900	177,100	214,500	37,400	177,000	115,000	-62,000
B8	455,800	542,300	86,500	354,900	473,800	118,900	355,000	285,000	-70,000
Total B use class (sqm)	873,800	1,014,000	140,200	794,600	997,600	203,000	795,000	767,000	-28,000
B1a/b	49	65	16	53	62	9	53	74	21
B1c/B2	44	37	-6	44	54	9	44	29	-16
B8	91	108	17	71	95	24	71	57	-14
Total B use class (ha)	184	210	27	168	210	42	168	159	-9

Source: Oxford Economics forecasts (HEDNA Update Dec 2016) Experian and Trend based projections (HEDNA Update, Appendix D 2016)

25. To calculate employment floorspace requirements (Table 4) the HEDNA identifies sectors where significant numerical changes in employment are forecast, shown in Tables 2 and 3 below, this is then assigned to particular use classes and quantified as floorspace after applying appropriate employment density and plot ratio (indicative, ie average) assumptions.³

Table 2 Aylesbury Vale Oxford Economics employment forecasts FTEs (full time equivalents) – sectors showing significant numerical changes in employment

Sector	Change 2013-2033	% change 2013-2033
Administrative and support service activities	+3,130	+57%
Professional, scientific and technical activities	+2,770	+65%
Human health and social work activities	+1,500	+21%
Wholesale and retail trade; repair of motor vehicles and motorcycles	+1,390	+13%
Construction	+1,360	+42%
Accommodation and food service activities	+1,230	+42%
Public administration and defence; compulsory social security	-260	-6%
Manufacturing	-970	-20%
All sectors	+12,080	+21%

Source: HEDNA (December 2016) figure 99, p133

³ B1a/b: density 12 sqm per full time equivalent (FTE), plot ratio 50% of site area. B1c/B2 40 sqm per FTE, plot ratio 40% of site area. B8: density 70 sqm per FTE, plot ratio 50% of site area. HEDNA Update Figure 93.

Table 3 Aylesbury Vale Oxford Economics employment forecasts

	2013	2033	Change 2013-2033	% change 2013-2033
Total employees (not FTE)	85,730	102,630	+16,900	+20%
FTEs in B class use sectors				
B1a/b	20,250	26,890	6,640	33%
B1c/B2	4,370	3,730	-640	-15%
B8	6,510	7,750	1,240	19%
Total B use class FTEs	31,130	38,370	7,240	23%

Source HEDNA (December 2016) Figure 100, p133

Table 4 Aylesbury Vale Oxford Economics B use class floorspace need (square metres) and land need (hectares)

Use class	FLOORSPACE NEED (sq. m)			LAND NEED (hectares)		
	2013	2033	Change 2013-2033	2013	2033	Change 2013-2033
B1a/b	243,000	322,600	79,600	49	65	16
B1c/B2	175,000	149,100	-25,900	44	37	-6
B8	455,800	542,300	86,500	91	108	17
Total B use class	873,800	1,014,000	140,200	184	210	27

Source: HEDNA figure 101, p133

HEDNA Addendum (September 2017)

26. Following the publication of the HEDNA Update, Buckinghamshire authorities have carried out further analysis of employment land supply and discussed the position with Bucks Thames Valley LEP. It has become apparent that there is a mismatch between what the HEDNA economic forecasts are showing and what the market is prepared to deliver on the ground, as demonstrated both by what the commercial property market is experiencing and in terms of market signals for different types of commercial floorspace. In particular there is evidence that the office sector is experiencing no growth and the industrial sector is growing, albeit at a low level. It is expected that this situation will continue into the near future and this directly contradicts the economic forecasts that are the basis of the HEDNA.
27. Commissioned by the Buckinghamshire districts together with the LEP, the HEDNA Addendum provides for more detailed consideration of local market circumstances relating to commercial development and further analysis of other considerations. This accords with PPG guidance on assessing the need for employment land. Work carried out as part of the Addendum includes:
 - Additional forecasts based on the labour supply, past employment completions, property market analysis and local market characteristics built into the labour forecast;
 - Review of employment densities;

- Further views of the commercial property market – a market review was undertaken by the Buckinghamshire Thames Valley LEP; and
 - A supply/ demand balance across the FEMA based on work undertaken by the District Councils on potential employment land supply including employment land losses.
28. The Addendum identifies a mismatch between approaches to assessing economic needs based on demand and labour supply forecasts, and those based on market considerations and past take up, reaching differing conclusions on the need for different “B” use classes. This creates uncertainties in planning ahead. Key points:
- There is a shortfall of land and floorspace in Wycombe, Chiltern and South Bucks districts and a surplus in Aylesbury Vale District;
 - There is a mismatch of supply forecasts in terms of use class;
 - There is sufficient land in the Functional Economic Market Area (FEMA) to meet overall forecast needs and to cater for adjustments in growth sectors going forward.
29. In addition to the labour demand scenario, included within the HEDNA, the HEDNA Addendum considered a number of alternative forecasts which are summarised below.

Table 5 Labour supply scenario

Use Class	Change 2013-2033 sqm	
	Floorspace (sqm)	Land (hectares)
B1a/b	101,000	20
B1c/B2	-15,000	-4
B8	124,000	25
Total B use class	210,000	41

Source: HEDNA Addendum, September 2017

30. Under the Labour supply scenario, Aylesbury Vale’s employment land requirement would be 41 hectares.

Table 6 Past employment completions scenario

Use Class	Projected net change 2013 – 33	Projected net change (Outlier removed) 2013 – 33
B1a/b	-9,400	-15,500
B1c/B2	126,800	-31,400
B8	15,100	15,100
Total	132,500	-31,700

Source: HEDNA Addendum, September 2017

31. For the past completions scenario, trends in past development rates were considered by looking at employment floor space gained or lost through both planning approvals and permitted development schemes over a 10 year period and projected forward to 2033. Under this scenario, Aylesbury Vale would experience a decline in B1a/b and B1c/B2 floorspace and some increase in B8 floorspace.

Table 7 Bottom up Scenario

Use Class	Change 2013-2033	
	Land area (hectares)	Floorspace (square metres)
B1a/b	-2	-12,000
B1c/B2	-1	-2,000
B8	5	23,000
Total B use class	9	9,000

Source: HEDNA Addendum, September 2017

32. Bottom up scenario – This forecast aims to better reflect local market characteristics from both the HEDNA and the property market intelligence from the LEP and build it into the labour demand scenario. Under the scenario, Aylesbury Vale’s total employment land requirement would be 9 hectares.
33. The Addendum also explored the implications of changing density assumptions – the amount of floorspace required by each worker. For Aylesbury Vale this resulted in an increased requirement for B8 floorspace and reduced requirement for B1a. As with the scenarios explored as part of the HEDNA, there is considerable variation in the results of the additional forecasts considered. For the FEMA as a whole both the bottom up and past completions scenario forecast negative growth, which is not considered a positive basis for planning future employment provision.
34. Overall the HEDNA Addendum shows that the HEDNA forecast does not reflect what is actually happening on the ground or what is expected to occur in the near future. Together with the likely need to take into account the significant future economic benefits of the Expressway this shows that a precautionary approach should be taken to the apparent employment land oversupply in Aylesbury Vale and the early local plan review should address the situation following further monitoring of what actual economic development is taking place. It would not be prudent to significantly reduce employment land supply now only to find that an increased supply is required as part of the local plan review.

Housing and Economic Land Availability Report (HELAA, January 2017)

35. The HELAA presents a strategic picture of the availability and suitability of land for development in Aylesbury Vale. It attempts to establish realistic assumptions about the number of homes and amount of economic development this land could yield and timeframe within which this might come forward. The HELAA follows the agreed methodology set out in ‘Central Buckinghamshire HELAA methodology’. Table 8 summarises capacity for economic development uses.

Table 8 HELAA economic development capacity (square metres)

	Total floorspace	A1	A2	A3	A4	A5	B1	B2	B8	D1	D2	Other/ not specified
HELAA Capacity	605,033	34,690	192	7,115	0	0	338,092	22,914	75,595	14,412	9,053	91,821
Sites 500sqm+ outside HELAA settlements	210,151						48,201	44,652	43,550	17,329	5091	51328
<i>Commitments from sites below 500sqm</i>	-40,973	1849	0	0	0	0	-50,157	0	0	2,531	0	4,804
Total capacity	774,211	36,539	192	7,115	0	0	336,136	78,566	119,145	34,272	14,144	147,953

Source: (HELAA Erratum, Table 7, March 2017)

Employment Land Review Update 2012

36. The Employment Land Review (ELR) Update considered the supply of and demand for employment land and premises in Aylesbury Vale. Informed by Aylesbury Vale Employment Land Review (2008) the 2011 Housing & Economic Growth Assessment; and a comprehensive assessment of existing employment sites and potential land allocations. The ELR identified factors which influence the relative attractiveness of the Vale as a business location compared to surrounding areas; assessed the future employment development potential of a number of existing employment sites, and potential locations for future employment development.
37. ELR Supply and demand figures are superseded by evidence set out in Central Buckinghamshire HEDNA and HEDNA Addendum. However, important aspects of the ELR remain relevant, in particular, the assessment of employment sites and potential land allocations. The findings are set out below. Importantly the employment sites are found to be suitable for retention and the factors which determined this suitability have not altered appreciably since the ELR was compiled. Key points:
- there is potential for further rationalisation of employment land within the Gatehouse Industrial Area, Aylesbury;
 - recommend an allocation of 6.5 hectares of land at Buckingham for employment development to support the on-going development of the town's economy; and
 - recommend provision for around 10 hectares of employment land at Westcott Venture Park in addition to the consented development.

Table 9 Employment sites: summary of ELR conclusions and recommendations

Existing Employment Sites	
Haddenham Business Park	A good quality employment site which benefits from good accessibility, particularly the fast rail link to London. Given the strategic accessibility there could be potential for further employment development in the longer-term should additional residential development be proposed in Haddenham to support local living and working, or a specific opportunity arise to secure strategic inward investment.
Triangle	A good quality employment site which contains an above average

Business Park, Stoke Mandeville	number of high-tech occupiers. Somewhat detached from larger settlements in the Vale (with implications for its sustainability as a location for additional employment). There is one sizeable vacant unit but otherwise occupancy levels are strong. Potential to extend the site towards the A413 Wendover Road subject to market demand and landowner intentions.
Westcott Venture Park	A large site, 260 hectares. Former RAF airfield. Good access from the A41. Some distance from larger settlements in the District. Over 60 businesses including distribution, fabrication, plant hire, car repair, and High Tech. Consider it is appropriate to allocate additional land to support employment in the West of the District. A masterplan-led approach to guide future development and investment at this site is needed. This should encourage redevelopment and intensification within the existing allocated land, in advance of release of further land for employment development. More intensive development would support a greater critical mass and activity on the site, improving its attractiveness as an employment location.
Long Crendon Business Park, Thame	12.95 hectares. Industrial and office development. Approx 100 businesses. Overall, the Business Park performs well as an employment location. It serves the western part of Aylesbury Vale and South Oxfordshire. Recommend policy protects continued employment use of this site but consider that further employment land allocations to serve this area should focus more towards Haddenham, which benefits from stronger public transport accessibility, and Thame.
Aylesbury Town Centre	Assessed as an employment location as it contains a number of office blocks. Quality of the stock variable. Some corporate occupiers. Relatively limited office floorspace developed in Aylesbury Town Centre in recent years, which reflects values, lack of critical mass of existing office occupiers and the town's distance from other employment centres and centres of population. There is no significant proposed office development in the town centre with planning consent. Short-term prospects for substantial development of town centre office floorspace are limited unless it can be underpinned by a substantial pre-let. Over the medium-term seek to develop and nurture the town centre office market. Recommend that the Council review the Town Centre masterplan and seek to focus office development in certain locations within the centre to develop a critical mass of floorspace subject to viability analysis. The masterplan should consider the most appropriate locations taking account of land availability, access, and environment with the aim of delivering over time a concentration of modern commercial office floorspace. Consider policies regarding redevelopment of existing dated office floorspace. Should seek to retain and develop the existing office quarter around Walton Road but show flexibility regarding sub-division of larger space and selective changes of use in other areas where a lack of demand is demonstrated despite active marketing for employment use. Where redevelopment is proposed, recommend policy seeks to require some employment floorspace provision, taking into account scheme viability.
Gatehouse Industrial Area,	57 ha. An important employment location within the town. Quality of the site varies. Over time, there is potential for further rationalisation of employment land and introduction of a greater mix of uses. There is a

Aylesbury (5)	need for a stronger plan-led approach to ensure compatibility of land uses. Recommend that a coherent masterplan is developed by AVDC and AVE involving existing landowners and businesses, as a means of attracting and guiding future investment and to guide future land use planning decisions.
Rabans Lane Industrial Area, Aylesbury	38 ha. A reasonably performing employment area which provides good quality, modern accommodation and caters for a range of employment activities and businesses of varying sizes. Considerable recent investment, particularly along Coldharbour Way and Brunel Road has helped create a good balance and range of accommodation. A reasonably high vacancy level - partly indicative of the market for higher quality modern industrial units in the local market. The site provides good quality industrial accommodation and policy could seek to retain the land for employment uses.
Pitstone Green Business Park	A good quality site with further development potential within the allocated employment area. Recommend planning policy seeks to support continued employment development within the existing employment area.
Halton Brook Business Park, Aston Clinton	Site provides an opportunity to secure further development in high-tech sectors particularly to support the expansion of existing companies. Further development beyond the existing planning consent is limited by traffic impacts associated with additional development in this location.
Network 421, Gawcott near Buckingham	A good quality development site accessible from the A421. Public transport is limited as is walking access. Somewhat detached from the urban area. It demonstrates demand for good quality employment space in the Buckingham area.
Tingewick Road Industrial Estate, Buckingham	8.2 ha primarily B1 and B2. Planning consent to redevelop the eastern part of the estate for 93 dwellings and 2,046 sqm of B1 floorspace. One of Buckingham's poorer quality employment sites. Less active than other employment sites in the town, it caters for demand from local occupiers looking for lower value space. Consider the long-term future of the remaining land at this site in developing allocations policies in conjunction with proposals for developing employment land elsewhere in Buckingham.
Buckingham Industrial Park, Buckingham	26 ha. One of the Vale's larger employment sites, well located off the A421, around 2km south of the Town Centre. Provides a range of accommodation from small office units to larger manufacturing and distribution facilities. 110+ businesses. Site has been developed progressively over time. Well occupied, with a range of uses and above average representation of higher-value activities including significant R&D functions. Majority of units are in a good condition. There is significant evidence of recent development.
Silverstone	One of the Vale's highest profile and most important employment sites, located in the north of the District, Silverstone Circuit falls partly in Aylesbury Vale and partly in South Northamptonshire. The site benefits from strong road access. The business park lies within Aylesbury Vale and is expected to deliver 115,000 sqm of employment space, comprising predominantly B8 with some B1 and B2 uses. Expected delivery: 20 years. Development Brief jointly prepared by the two Councils. Continued protection of the 25 hectares of land identified for employment use remains appropriate. The site provides opportunities to nurture and develop the motorsport cluster and secure high value-added inward investment.

Potential Locations	
Aston Clinton Road Major Development Area	A strong potential location for future employment development within Aylesbury given its strong strategic road access, located close to the end of the A41 Dual Carriageway. Potential to deliver local services alongside major development and public transport access to Aylesbury Town Centre. Need to consider the scale of employment land provision in regard to the supply-demand balance for employment floorspace in the town.
ARLA, Land east of College Road North, Aston Clinton	35 ha. Consent granted in 2011 to Arla Foods Ltd to build one of the largest dairies in Europe. The development represents a major inward investment to the District. Will provide good quality modern industrial floorspace in the short-term close to the A41 Dual Carriageway, supporting short-term employment land supply. Overall delivery likely to be phased over a decade or more.
Stoke Mandeville Hospital	Site of hospital and stadium. Hospital has undergone extensive renovation and development, including new inpatient and outpatient buildings. Further development is planned. The case for allocating additional land within this area would need to be justified on the basis of supporting sectoral development, particularly healthcare (telecare and assisted living technologies). Potential for selective redevelopment and intensification of use on the Hospital campus. This should be progressed in advance of the allocation of additional greenfield land.

38. The ELR identified some sites with potential for redevelopment, a number of which have since received planning permission or been redeveloped, for example, Ringwood House, Walton Street, Aylesbury (permission for 38 dwellings subject to a Section 106 Agreement); TRW site Buckingham Road, Aylesbury (permission for 73 dwellings under construction with 12 remaining to come forward 31/3/16); former MAFF Buildings, Hampden Hall, Wendover Road, Western Turville (permission for 16 dwellings), Former Lucas Assembly & Test systems, Bath Lane/Tingewick Road, Buckingham (permission to redevelop for University education and student accommodation).
39. Importantly the ELR treated provision at Arla Dairy and Silverstone as addressing a separate regional requirement and not available to meet general local employment needs. In calculating supply for the HEDNA addendum however this distinction has not been made and all floorspace has been included (based on monitoring data at 1 April 2016).

Employment floorspace requirements

40. Future employment requirements for the district (for B class uses) have been assessed as part of Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA). The assessment uses an economic forecast from Oxford Economics to predict how many workers there will be by 2033 (see Tables 2 and 3 above). An assessment is then made of the amount of floor space each employment use would require to accommodate that number of workers. This is converted into land area requirements for each employment use – the ‘demand’ calculation.

41. The HEDNA (Table 4 above) forecasts a requirement within Aylesbury Vale for 140,200 sqm additional floorspace in Aylesbury Vale 2013-2033 comprising 79,600 sqm B1a/b: - 25,900 sqm B1c/B2, and 86,500 sqm B8.

Employment Land Supply

42. Potential employment land supply over the plan period has been estimated by taking into account unconsented employment allocations in the adopted local plan and neighbourhood plans, planning permissions and completions, minus projected losses expected to arise as a result of permitted development and projected small site losses. Table 10 shows that Aylesbury has a supply of 450,000 square metres, i.e. 81,000 sqm B1a/b, 233,000 sqm B1c/B2 and 136,000 sqm B8. This is before the requirement or proposed site allocations are added. Figures are based on monitoring data as at 1st April 2016 and take into account vacancies and projected losses. It should be noted that some floorspace has been estimated, for example where the data source specifies a B1/2/8 or B1 use (with no breakdown for categories given). Hectarage (ha) is estimated and derived from floorspace, using a plot ratio calculation.

Table 10 FEMA Employment land change 2013-2033 (figures are rounded to nearest '000)

	Use Class	WDC		AVDC		CDC/ SBDC		FEMA	
		sqm	ha	sqm	ha	sqm	ha	Sqm	ha
Requirement (HEDNA)	B1a/b	68,000		80,000		40,000		211,000	
	B1c/B2	-48,000		-26,000		-30,000		-94,000	
	B8	34,000		87,000		32,000		174,000	
Supply	B1a/b	-1,000		81,000		-77,000		3,000	
	B1c/B2	-81,000		233,000		-59,000		94,000	
	B8	-15,000		136,000		-66,000		54,000	
Net requirement (shortfall or surplus)	B1a/b	-69,000	-14	2,000	0	-117,000	-23	-208,000	-42
	B1c/B2	-33,000	-8	259,000	65	-29,000	-7	188,000	38
	B8	-49,000	-10	49,000	10	-98,000	-20	-120,000	-24
	Total	-151,000	-32	310,000	75	-245,000	-50	-140,000	-28
Potential New Allocations to meet supply	B1a/b	14,000	3	29,000	6	94,000	19	138,000	28
	B1c/B2	50,000	13	63,000	16	12,000	3	125,000	31
	B8	30,000	6	40,000	8	0	0	70,000	14
	Total	95,000	21	132,000	30	107,000	22	333,000	73
Balance taking account of potential allocations	B1a/b	-55,000	-11	31,000	6	-23,000	-5	-70,000	-14
	B1c/B2	17,000	4	322,000	80	-17,000	-4	313,000	69
	B8	-19,000	-4	89,000	18	-98,000	-20	-49,000	-10
	Total	-57,000	-10	442,000	105	-138,000	-28	193,000	45

Source: HEDNA Addendum (Table 52)

43. With regard to Aylesbury Vale, since the HEDNA Addendum work was being carried out there have been some changes which affect the above figures: 2016-17 monitoring data is now available; the amount of b use floorspace proposed to be allocated (potential new allocations to meet supply) should be increased by 2 hectares to take into account employment land proposed at Salden Chase ; and the amount of land identified for change (losses) should increase to take account of 6.6 hectares developed for residential at Rabans Lane Industrial Estate and a loss of two hectares at Ardenham Lane.

Neighbourhood Plans

44. Within Aylesbury Vale, 14 Neighbourhood Plans have passed referendum and are 'made' and therefore are an integral part of the local planning system. These cover Buckingham (and part of Gawcott with Lenborough), Buckland, Cheddington, Edlesborough, Great Horwood, Haddenham, Long Crendon, Marsh Gibbon, Pitstone, Quainton, Waddesdon, Wing, Wingrave with Rowsham and Winslow. A referendum of Steeple Claydon neighbourhood plan is scheduled for 30 November. A further 16 Neighbourhood Plans are at various stages of progression. The Council recognises the important role Neighbourhood Plans will play in helping to meet district wide objectives. The commentary below relates to Plans that have passed referendum or are expected shortly to proceed to referendum and focuses on employment related policies.
45. **Buckingham Neighbourhood Plan** (October 2016): An objective of Buckingham NP is to foster the economic development of the town and its hinterland by providing employment led growth, increasing the town's appeal to tourists and invigorating the town centre. Policy EE1 allocates 10 hectares of land for employment - preferably uses other than B8. Policy EE2 – Allocates land for retail, office and mixed development; EE3 – Development of the town centre – supports applications for new town centre uses (A1, A2, A3, A4, A5, B1(a), C1, D1 & D2).
46. **Buckland Neighbourhood Plan** (February 2015) Policy BP8: Small business sites – supports applications for small scale businesses, offering employment opportunities available to local people provided they do not create significant additional traffic movements. Policy BP9: redevelopment of existing businesses – supports applications from businesses (B1 – Office and B2 – Light Industrial) to expand their premises within the neighbourhood area will be supported, provided they do not damage the residential environment and do not create significant additional traffic movement. Policy BP10: Reuse and Relocation of Farm Buildings – supports applications for redundant traditional farm buildings provided they are no longer suitable for modern farming methods and do not involve significant rebuilding or extensions, respect the original architectural and/or historic character of the building and lead to an enhancement of the immediate setting.
47. **Cheddington Neighbourhood Plan** (August 2015) Policy 1: A Spatial Plan for the Parish supports development proposals on land within the defined Settlement Boundary provided they do not result in the loss of any existing publicly accessible open space and are consistent with other development plan policy. Outside the settlement boundary supports the sustainable growth and expansion of a business or enterprise in the countryside area through conversion of existing buildings and well designed new buildings; promotes the development and diversification of agricultural and other land-based rural businesses; or supports sustainable tourism and leisure developments that benefit businesses in the

countryside area. Communities and visitors and which respect the character of the countryside.

48. **Edlesborough Neighbourhood Plan** (August 2017) Policy EP6: Economic Development supports proposals to extend the existing Sparrow Hall Farm industrial area to deliver new employment opportunities for local people subject to meeting criteria on landscape, biodiversity and amenity. Encourages new commercial development of B1 office-type uses within the main village boundaries, as a means of growing the local employment base to match the increase in new homes.
49. **Great Horwood Neighbourhood Plan**: Notes that the one employment site in the parish, Greenway Business Park, may have potential for further commercial development. Policy 1: Spatial Plan & Sustainable Development: does not permit development proposals on land outside the defined settlement boundary unless necessary for the purposes of agriculture or forestry, or for enterprise, diversification or recreation that benefits the rural economy without harming countryside interests. New development in the countryside should not result in the loss of open land that contributes to the form and character of Great Horwood and Singleborough.
50. **Haddenham Neighbourhood Plan** (May 2015): Policy SRL2: Redevelopment at Banks Park allocates land to provide improved community facilities, to include new retail (A1 – A4) and commercial (B1) developments in the village hub as long as they do not unduly affect traffic flow, parking and residents' amenities or prejudice the success of existing facilities.
51. **Long Crendon Neighbourhood Plan** (June 2017) Local Services to support rural economic development providing more local people with the opportunity to work in the Parish (objective). Policy LC5: Key Employment Sites - supports proposals that will lead to additional employment within Use Classes B1, B2 and B8 for schemes of high-quality commercial buildings, provided their visual and environmental impact on the landscape can be satisfactorily mitigated at the following locations: Crendon Business Park; Woodway Farm; and Notley Farm. Seeks to resist proposals that would result in the loss of an existing employment use unless it can be demonstrated that continued use is no longer viable, which will include evidence that the property has been marketed on reasonable terms at open market value for a period of at least 18 months.
52. **Marsh Gibbon Neighbourhood Plan** (October 2014) Policies MG10: Small scale Businesses Supports applications to expand business premises (B1, B2 and B8 uses) provided they do not damage the residential environment or create significant additional traffic. Encourages applications if they offer employment opportunities provided they do not damage the residential environment and do not create significant additional traffic. MG11: Relocation of Businesses, Supports relocation of businesses where existing employment uses are inappropriately located in the village and causing traffic congestion and visual intrusion, if based on less intrusive uses, provided there is no net loss of employment. MG12: Reuse and Relocation of Farm Buildings. Supports applications for new uses of redundant traditional farm buildings providing it has been demonstrated that they are no longer viable or needed for farming and for the relocation of farm buildings to sites better able to be accessed by heavy farm traffic. Policy MG 15: Business Traffic – covers parking for staff and visitors and provision for turning of delivery vehicles.

53. **Pitstone Neighbourhood Plan** (January 2016): Policy 4: Land West of Westfield Road Development - supports proposals for business uses (B1, B2 and B8) and seeks to resist their loss unless it can be demonstrated that the land is no longer viable for business use and alternative uses are suitable. (land has planning consent).
54. **Quinton Neighbourhood Plan** (October 2016) Make appropriate provision for a changing agricultural economy, Policy LE1 Local Employment covers proposals to redevelop sites, expand premises, relocation of inappropriately located business. Notes that proposals will be particularly encouraged if they offer employment opportunities available to parish residents.
55. **Steeple Claydon Neighbourhood Plan** (September 2017) Objective: To encourage appropriate employment use for land within the parish in support of local employment opportunities including land-based and land-related rural businesses as well as home-based business/work. Policy SC1: Steeple Claydon Settlement Boundary Outside the Boundary, the policy requires proposals to be suited to a countryside location.. Proposals that bring employment and tourism will be encouraged providing they can demonstrate that they contribute to the rural economy and are sustainably located such that they protect the character and appearance of the countryside and minimise the need to travel.
56. **Waddesdon Neighbourhood Plan** (May 2017) Policy WAD4: Waddesdon Manor - Waddesdon Estate And The National Trust seeks to encourage further investment in Waddesdon Manor and Waddesdon Estate and their supporting infrastructure, to maintain the status of Waddesdon Manor as a visitor attraction of national importance. Policy WAD6: Employment Land - seeks to retain a range of employment premises in the village to continue to provide job opportunities for the local community.
57. **Wingrave with Rowsham Neighbourhood Plan** (November 2015): Local Economy objective: to support local economic development by protecting existing employment sites and encouraging their growth. Policy 1: A Spatial Plan for the Parish defines the Wingrave Settlement Boundary, allows for development proposals on land outside the defined settlement boundary at Wingrave where necessary for the purposes of agriculture or forestry, or for enterprise, diversification, recreation or tourism that benefits the rural economy without harming countryside interests. Policy 6: Local Employment encourages proposals at the four main employment sites to intensify and/or extend their employment uses, provided any environmental impacts can be satisfactorily mitigated and resists the unnecessary loss of an existing employment use, as the current uses in the parish offer a range of job opportunities.
58. **Wing Neighbourhood Plan** (March 2015): Objective: To improve links between all business users to create an integrated commercial identity. Policy E1: New shops and employment provision in the village supports New retail (A1) and commercial (B1) developments in the built up area of Wing village. Policy E2: New employment provision in the Parish beyond Wing Village – supports new or improved industrial developments or commercial enterprises within the Parish providing they are of appropriate scale and there are no undue adverse impacts on the rural landscape or road network. Policy E3: Protection of existing employment provision seeks to resist the loss of shops, pubs, food outlets and commercial services within the community.

59. **Winslow Neighbourhood Plan** (June 2014) Objective to retain and grow the number of jobs in the town. Spatial policy 1 directs future economic development related activity to the town of Winslow, aims to contain the spread of the town through use of previously developed land and infilling. Policy 6: Land South of Buckingham Road allocates land for a mixed use scheme comprising: approximately 1.5 Ha of land for B1, B2 and B8 uses; 1.35 Ha for a railway station, bus layby, pedestrian, cycling and taxi facilities, and parking and 1.5 Ha for education use. Allocation of land off Station Road for 65 dwellings would lead to a loss of 1.6 Ha employment land.

Issues raised in consultation responses

60. A summary of key issues raised by respondents to the 2016 draft VALP relating to employment policies is set out below.

Policy D9 – Provision of employment land

- Support the policy, particularly the acknowledgement that there is an oversupply of employment land compared with the district's needs.
- Policy too restrictive. Not flexible enough to allow small business to establish or expand or allow degraded land to be considered for employment uses.
- Lacks any reference to new employment space as part of large scale sustainable development proposals.
- More clarity is needed with regard to identifying and releasing employment sites for housing development. Need a transparent methodology for this.
- Policy focus at district level does not meet the needs of local communities.

Policy E1 Protection of Key Employment Sites

- General support for protecting key employment sites.
- Policy wording may make it too easy to convert employment land for housing.
- Policy over protective of employment land; poorly aligned with the NPPF. Should release more employment land for mixed use.
- Policy should include employment sites in Neighbourhood Plans.
- Lack of evidence and targets.
- Lack of clarity surrounding implementation and long term costs and opportunities.
- Inadequate employment opportunities, particularly in proximity to residential areas to limit commuting and secure new business within Aylesbury Vale.
- Where Key Employment Sites are visible from Chilterns AONB, amend policy wording to safeguard from adverse impacts on the AONB.

Arla Woodlands:

- Question the suitability of the site for employment due to flood risk.
- Site well connected. Potential to attract high value sectors. A key strategic site for Buckinghamshire as a whole.

- Non employment uses should be acceptable alongside employment uses.
- Woodlands site would deliver the Eastern Link Road.

Haddenham Business Park

- Concern that units are vacant; reduce costs to ensure units are affordable and comparable with other sites.

Buckingham Business Park

- Disagree with strategy to promote B8 uses.

Gatehouse Industrial Area

- Location and access make the site unsuitable for long term uses other than residential.

Silverstone:

- Highlight shared interest in supporting high tech performance sector. Look forward to continuing successful collaboration on the development of the site for high tech employment.

Triangle Business Park: support identification of the site. Note site is visible from the AONB.

- Westcott Venture Park: support designation of the Park as an Enterprise Zone. Concern regarding traffic impact on already congested A41. A sustainable location.

Policy E2 Other employment sites

- Support the principle of additional employment sites; aligns with the NPPF.
- Potential traffic impacts – sites at Bletchley and Milton Keynes.
- Clarification sought on policy wording and the meaning of the first sentence.
- Define non-key employment sites.
- May allow employment land to be too readily converted to housing. Request more robust wording, in order to protect employment land.
- Request inclusion of a statement setting out the circumstances for a change of use.

Policy E3 Provision of complementary facilities for employees

- Some support for the policy.
- Question the use of the word 'appropriate'. Suggest reword.
- Employment needs will be met by the nearest urban centre, e.g. Milton Keynes.

Policy E4 Working at home

- General support for the policy.
- Emphasise the importance of fibre optic connections. Broadband internet is vital.

Other policies / General

- Lack of emphasis on creating jobs (Policy S1 Sustainable Development)
- How is a sustainable pattern of development to be achieved, i.e. balance of housing and jobs?

- Lack of employment opportunities in villages (Policy D7 Housing development at smaller villages).
- Request the VALP accommodates a proportionate level of employment need.
- Important to refer to the FEMA in this section.

Changes made at Proposed Submission Stage (Regulation 19)

61. Taking into account feedback and evidence, we have made a number of changes compared with the Draft VALP (summer 2016). Below is a summary of key changes made.

S2 Spatial strategy for growth (employment land element)

62. Policy is amended to reflect updated evidence on need as set out in the HEDNA (Update 2016 and Addendum) and information from neighbouring authorities Wycombe, Chiltern and South Bucks. This now states that provision will be made “for the identified need of 27 hectares of employment land and additional provision of some employment land to contribute to the employment needs of the wider economic market area.”

Policy D5 Provision of employment land (Draft VALP Policy D9)

63. New paragraphs are added to the preamble to this policy summarising further work carried out as part of the HEDNA Addendum, implications for the FEMA and the proposed approach. Policy D criterion a) is amended to ‘through allocations in this plan and appropriate allocations in neighbourhood plans’. Employment site allocations are added to the policy. Further detail is given in new site allocation policies D-AGT3: Aylesbury north of A41; D-AGT4 Aylesbury south of A41; D-AGT5: Berryfields; D-AGT6: and Kingsbrook; D-NLV001: Salden Chase, which are all allocated for mixed use, which provide guidance on site specific requirements.

Policy E1 Protection of key employment sites

64. Policy is unchanged since the Draft VALP (2016). In the list of Key Employment Sites given in the preamble, Rabans Lane Industrial Area is changed to ‘Rabans Lane/Coldharbour Industrial Area’, ie to encompass both the Coldharbour Lane and Rabans Lane Industrial Areas as this is considered to better reflect the extent of the employment area.

Policy E2 Other employment sites

65. This policy is amended first, to require all the policy criteria to be met and second, to require a site to be marketed for a period of two years, rather than the twelve months stated in the Draft VALP (2016). The supporting text provides additional information with regard to the type of information applicants will be required to provide in order to demonstrate their site is no longer viable.

Policy E3 Ancillary uses on employment land (Draft VALP Policy E3 Provision of complementary facilities for employees)

66. The policy title is changed from ‘Provision of complementary facilities’ to ‘Ancillary facilities on employment land’ and the policy is amended to set out three criteria which proposals must meet - that the proposal should be primarily for users of the employment site, ancillary to the employment use and that the use alone or combined with other existing and proposed

uses should not adversely affect the vitality and viability of any town centre or the social and community vitality of a nearby village. New text is added to indicate that conditions may be imposed to limit the scale of the operation and to restrict the range of activities or goods sold, where necessary, to ensure the criteria are met. The policy does not directly refer to traffic or visitor levels as it did in the 2016 iteration of the policy.

E10 Silverstone Circuit

67. A new policy is included within the proposed submission draft VALP which aims to provide a framework for the development of Silverstone Circuit.

E4 Working at home

68. This policy is amended to refer to 'Partial use of a residential property' rather than 'Use of a residential property'.

Local Plan approach

69. The approach is informed by national policy, evidence and feedback from internal and external consultation. The vision for the Plan is to ensure the availability of a diverse, flexible range of employment opportunities for new and existing businesses, which match expectations for employment growth in the district. This will be achieved through a combination of existing commitments, allocations and development at enterprise zones (at Aylesbury, Silverstone and Westcott). Key elements of the approach include making the best use of existing employment land and premises by retaining the most suitable sites and encouraging their refurbishment and renovation where necessary, allocating suitable sites and providing policy criteria and guidance to assess proposals which come forward during the plan period.
70. The proposed submission plan contains seven policies which directly address employment provision. Earlier versions of some policies were consulted on in summer 2016 as part of the draft VALP which was drawn up following an Issues and Options consultation in 2015 (which identified broad policy areas) and Scoping Consultation (2014). Related matters are also addressed elsewhere within the proposed submission VALP where relevant, such as Policy S2 Spatial Strategy for Growth, site specific policies and the Plan Vision and Objectives.
71. The Plan aims to protect Key Employment Sites for the duration of the plan period in order to support existing and new business and provide for continued employment growth and opportunities in the district. Some flexibility is provided with regard to other employment sites which allows for the possibility of changing to a different use class, subject to meeting policy criteria set out.
72. The Plan proposes that provision be made for the housing and employment needs of the new and existing population, including unmet needs from elsewhere if reasonable and sustainable, as identified through the VALP and in future revisions of the Local Plan which will include a range of employment land and premises to support inward investment and retain existing business (**Objective 2**). In assessing development proposals, consideration will be given to: b. providing a mix of uses, especially employment, to facilitate flexible working practices so minimising the need to travel (**Policy S1 Sustainable development for Aylesbury Vale**, criterion b)

73. **D5 Provision of employment land:** This policy sets out the approach to providing for employment growth and allocates employment land at the following strategic sites: Aston Clinton Road MDA, Berryfields, Hampden Fields, Kingsbrook, Salden Chase and Woodlands, College Road. All these sites are allocated for mixed use, including employment. Of these sites, Berryfields has outline consent and for the other five there is a resolution to grant permission subject to agreeing a S106. A planning application for a mixed use scheme is awaiting decision. The five Aylesbury sites are proposed for allocation to provide certainty and policy guidance as plans to develop Aylesbury as a Garden Town continue to progress. It is also considered to be a more sustainable approach to distribute development around Aylesbury rather than focus on one main employment area.
74. **E1 Protection of key employment sites:** Key employment sites are large sites in the district that contribute significantly to employment land supply for B class uses. The VALP lists 12 of these drawing on evidence set out in Aylesbury Vale ELR ((2012) which recommends these sites continue in employment use and makes site specific recommendations (summarised in Table 9 above). The list identified in the VALP takes into account changes in circumstances since the ELR was published and the NPPF requirement for planning policies to avoid the long term protection of sites allocated for employment use. Key Employment Sites are identified as being particularly important for the supply of local jobs and the local economy. This policy sets out the approach to protecting these sites and provides criteria for assessing planning proposals. Three of the district's Key Employment Sites are Enterprise Zones: Arla/Woodlands, Silverstone and Westcott Venture Park. Together these three sites comprise Aylesbury Vale Enterprise Zone.

Key employment sites

- Haddenham Business Park
 - Triangle Business Park, Stoke Mandeville
 - Westcott Venture Park EZ
 - Long Crendon Business Park
 - Gatehouse Industrial Area, Aylesbury
 - Rabans Lane/Coldharbour Industrial Area, Aylesbury
 - Pitstone Green Business Park
 - Halton Brook Business Park, Aston Clinton
 - Network 421, Gawcott near Buckingham
 - Buckingham Industrial Park, Buckingham
 - Silverstone Park EZ
 - Arla/Woodlands EZ
75. **E2 Other employment sites:** The VALP proposes a more flexible approach be taken towards employment sites which are not identified as key employment sites to facilitate a broad range of economic development. Policy E2 sets out criteria for considering proposals for the redevelopment and/or reuse of such sites to an alternative employment use. The Plan recognises that Aylesbury Town Centre and Stoke Mandeville are important employment locations.
76. **E3 Ancillary uses on employment land** This policy sets out criteria for considering proposals for ancillary uses on employment land.

77. **E4 Working at home** this policy provides guidance on the circumstances where partial use of a residential property will be permitted, subject to making appropriate provision for access, parking and noise attenuation arising from the business activity.
78. **E9 Agricultural development** sets out criteria which proposals for the development of new agricultural buildings or extensions of existing buildings would be expected to meet.
79. **E10 Silverstone Circuit:** This policy indicates the Council's support for the Circuit as an international venue and destination for world-class motorsport and a leading business, education, leisure and entertainment venue and makes provision for motor sports, a business and technology park, education, leisure and tourism. The policy sets out criteria requiring proposals to have regard to the need to avoid serious disturbance to local residents, to promote sustainable transport links, protect the rural and visual character of the countryside with particular attention to Stowe Area of Attractive Landscape and the archaeological significance of Luffield Priory. The policy is consistent with the Silverstone Circuit Development Brief (Feb 2009) outline planning consent (2012) and subsequent outline applications.

Aylesbury Garden Town

80. Aylesbury is identified as playing a substantial and critical role in delivering growth for the district and the rest of Buckinghamshire. The town will be a focus for:
- new market and affordable housing
 - new investment in economic activity and regeneration
 - new retail and employment development
 - delivering Aylesbury Transport Strategy prioritising investment in multi-modal
 - transport infrastructure and transport hub, and
 - new infrastructure, including health, education and community infrastructure, open
 - space and recreation, and emergency and public services.

81. **Policy D1 Delivering Aylesbury Garden Town** sets out some overarching principles and factors to consider to guide the development of Aylesbury as a Garden Town.

Employment land supply versus requirements

82. As the proposed submission VALP acknowledges, employment need is usually met by new allocations to satisfy the forecast requirement. However the district's forecast requirement is 27ha whilst the Council has a supply of over 100ha (excluding site allocations not yet consented). The proposed approach is, however, considered reasonable and justified for several reasons.
83. First, Chiltern, Wycombe and South Bucks have a shortfall of employment land compared with requirements (see Table 10 above) which is unlikely to be able to be met within these areas. Since they are located within the same Functional Economic Market Area as Aylesbury Vale and Aylesbury Vale has fewer constraints it makes sense for Aylesbury Vale to accommodate unmet need where suitable opportunities exist and this would be sustainable, particularly as Aylesbury Vale is accepting a significant amount of unmet housing need (8,000 new homes) from the same areas.

84. The Memorandum of Understanding agreed between Aylesbury Vale District Council, Wycombe District Council, Chiltern District Council, South Bucks District Council, and Buckinghamshire Thames Valley Local Enterprise Partnership (July 2017) notes that 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.
85. Second, the oversupply within Aylesbury Vale arises as a result of a combination of existing commitments (Neighbourhood Plan allocations, completions and permissions) and the three Enterprise Zone areas (Silverstone, Arla/Woodlands and Westcott Venture Park). The VALP proposes some employment provision as part of large mixed use schemes (for example at Berryfields and Hampden Fields) since facilitating some local employment is considered a more sustainable approach than a solely residential scheme, albeit with some supporting social infrastructure.
86. Third, Arla/Woodlands, Silverstone and Westcott Venture Park all have Enterprise Zone Status. Together these three sites comprise Aylesbury Vale Enterprise Zone'. There is a strong commitment from the Council, the LEP and the Government to making these work. They also have a specific function in delivering growth in particular employment sectors such as high tech engineering and scientific research.
87. Fourth, while according to the Oxford Economics Forecast the FEMA has an overall surplus of b use land, for both B1a/b and B8 uses there is a shortage of floorspace (-14 and -49 ha). Yet the market data shows no current demand for B1 a/b . For B1c/B2 there is a surplus (69 ha) but this is an area where some growth is occurring and is expected to continue.
88. Fifth, the development of a new station at Winslow together with improved connectivity delivered as part of East-West rail and the Oxford Cambridge Expressway, can be expected to support further jobs growth in the district above the present requirement, particularly as one of the prime objectives of the Expressway project is to boost economic growth in the growth corridor defined by the National Infrastructure Commission.
89. As the HEDNA Addendum notes, assessment of the qualitative mix of employment land supply is just as important as assessing the overall amount of supply. "The supply demand balance is a quantitative exercise and it should be noted that you would not expect or want supply and demand to be perfectly aligned (although you would expect the objectively assessed need for employment floorspace to be met in full). The market requires a mix of locations, quality and types of premises and sites that means that simply matching the quantitative floorspace needs is unlikely to be sufficient to meet economic development needs" (paragraph 2.71).
90. To conclude, there is a need to provide for sufficient employment land within the wider Functional Market Area and the surplus of employment land within Aylesbury Vale is crucial in this regard.

Permitted Development Rights

91. In 2013 permitted development rights were introduced which enabled offices (B1a) to be converted to residential use (C3 use) without the need to apply for planning permission.

Instead applicants need only apply to the Council for prior approval in respect of flooding, highways, transport and contamination impacts. It was initially proposed this arrangement would expire after three years, however, it became permanent in April 2016. A new three-year temporary permitted development right for the change of use from light industrial to housing has also been created, up to a maximum floorspace of 500 sqm.

92. As a result of permitted development rights, a significant amount of office floorspace has been lost – an estimated 15,100 square metres (as at 1/4/16). This is in addition to office floorspace lost over the years due to the higher land values achieved through residential development.

status	B1a lost (sqm)
Completed	-3,552
Commenced	-5,752
Approved	-5,841

93. We anticipate that in future the amount of B1a office floorspace lost through permitted development will reduce to a degree, however, in the absence of any change to government policy, continued losses are expected to occur, albeit at a reduced rate and we have factored this in our calculation of future supply over the plan period. The method we have adopted is to treat PD completions and permissions for the past two years as representing five years worth of supply (beginning in 2014/15 as no PD is recorded for 2013/14), allowing three years for permissions to complete and derive an annual average loss by dividing the total loss from completions plus permissions by five. For the years 2019-20 to 2023-24 we apply a 50% discount and for the remaining 9 years a 25% discount. This gives a loss of 14,400 sqm between 2019 and 2033 and a total estimated loss of B1a from PD over the plan period of 29,500 sqm. The Government has also consulted on extending PD to the other B use classes so losses of other employment land could occur in the future.

Sequential approach and main town centre uses

94. Most of the district's employment land (b class) growth is expected to come forward outside a town centre. National Policy advises that a sequential approach be taken to locating main town centre uses, which includes offices, and that preference should be given to a town centre location. There are particular challenges in planning significant new office floorspace in town centre locations where current and recent land use values favour residential. The ELR notes that new office provision in Aylesbury Town Centre, while desirable, is likely to be more viable where it forms part of a mixed use scheme or pre-let. In this regard, Aylesbury Town redevelopment and transport hub may both offer opportunities. In Buckingham Town Centre the Neighbourhood Plan Policy EE2 allocates land in the town centre for retail, office and mixed development.
95. Due to the nature of available opportunities across the district – at Enterprise Zones, as part of major schemes, on Key Employment Sites – growth in office floorspace is expected to occur primarily outside of any town centre, in particular, at edge of town locations, including around Buckingham and Aylesbury. These locations have good accessibility, and those at Buckingham and Aylesbury (the majority of allocations) are well-connected to the town centre. This approach is considered consistent with the NPPF paragraph 23 which states,

that “if sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre”.

96. It is considered that the Plan will help facilitate a qualitative improvement in B1a office provision in town centre locations. This will be achieved by applying policy criteria to shape proposals that come forward over the plan period and providing for new, modernised facilities through planned redevelopment, rather than deliver any overall increase in the amount of town centre office floorspace.
97. **Policy D6 Town, village and local centres to support new and existing communities** seeks to create a positive framework to support economic growth and diversity in town and local centres with a mix of uses which can include retail, leisure, services and employment. The policy indicates that within defined town centres, development proposals for retail, leisure, commercial, office, tourism, cultural, community and residential development will be supported (subject to compliance with other policies in the VALP) where they: a. retain or enhance the town centre’s historic character and appearance, vitality and viability b. sustain or enhance diverse town centre uses and customer choice, incorporating residential accommodation above ground floor level where possible, and c. are readily accessible by public transport, walking and cycling.

Employment sites with potential to release to housing

98. As stated, the NPPF requires planning policies to avoid the long term protection of employment sites that have no realistic prospect of being taken up for employment. With regard to existing and potential employment sites and allocations that might be reallocated to housing, since the ELR was carried out a number of former employment sites have been granted planning permission for housing. This includes for example, Tingewick Road Industrial Park, which the ELR identifies as not meeting current or projected future needs. The site has permission for 93 dwellings.
99. The VALP identifies the following sites for a change of use from b use employment to residential:
- **Policy D-AYL115 Rabans Lane**, Aylesbury. 6.6 hectares. Allocated for 200 dwellings (existing use: factory and offices). Adjacent to Rabans Lane Industrial Area (A Key Employment Area)
 - **D-AYL032 Ardenham Lane**, Aylesbury change of use from office to residential (2 hectares). The site comprises a number of uses including the Job centre at Sunley House and other employment uses at Ashton Court (part of the site already has permission 14/02780/APP, Ardenham House, 15/02351/COUOR , 15/03991/APP).
 - **Policy D-AYL052 PO Sorting Office**, Cambridge Street, Aylesbury. 0.92 ha allocated for housing and retail. Would result in loss of estimated 2,500 sqm B1.
 - **Policy D-AYL063 Hampden House**, Aylesbury. 7,876 m2 B1 (Vacant) Allocates site for 112 dwellings. (Previous application 14/02032/COUOR to convert to 112 flats withdrawn).
100. At Berryfields, the possibility of reducing the amount of employment land has been considered. However, it is concluded that on balance, delivering new employment provision close to the new housing represents the more sustainable option, rather than omitting this.

While there are existing employment opportunities fairly close by, the bulk of new employment is to be delivered on the other side of Aylesbury, for example, at the Arla/Woodlands Enterprise Zone. By providing local employment opportunities there is scope to minimise cross town journeys which in turn will help minimise traffic congestion and pollution.

101. As recommended by the Employment Land Review, Gateway Industrial Estate is undergoing rationalisation, with some schemes recently completed, including new residential; others consented and under construction. This however remains a key employment site for the district and intensification allows us to retain some employment floorspace while accommodating new residential and employment floorspace

Appendix 1

Summary of B class uses..

<i>Use Class</i>	<i>Description</i>
B1: Business	
B1a	Offices (other than those that fall within A2: Financial and Professional Services)
B1b	Research and development of products and processes
B1c	Light industry – for industrial process (compatible with residential areas)
B2: General Industrial	Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste)
B8: Storage or distribution	This class includes warehouses and open-air storage

Appendix 2 Employment land supply vs requirement calculations

			sq m	ha
	Requirement (HEDNA)	B1a/b	79,600	16
		B1c/B2	-25,900	-6
		B8	86,500	17
Comp*	B use class completions since start of Plan Period 2013-16 (net change)	B1a/b	-8,893	
		B1c/B2	86,161	
		B8	11,620	
UC*	Under construction (large and small sites) @ 1/4/16	B1a/b	61,186	
		B1c/B2	33,492	
		B8	13,939	
NYS*	Unimplemented planning Permissions @ 1/4/16	B1a/b	44,340	
		B1c/B2	113,779	
		B8	104,521	
	Allocations in existing plans (no PI Perm @ 1/4/16)**	B1a/b	28,841	
		B1c/B2	32,682	
		B8	5,761	
Losses	PD Office to Residential losses to 1/4/16 (permissions and completions)	B1a/b	-15,145	
		B1c/B2		
	Projected PD losses 2016 (2019) to 2033 to residential	B1a/b	-14,387	
		B1c/B2		
		B8		
	Small site projected losses to 2033***	B1a/b	-25,351	
B1c/B2		-4,764		
B8		-14,686		
Sites identified for change from B use classes to resi/other	B1a/b	-13,398		
	B1c/B2	-3,644		
	B8	-2,133		
	Vacant floorspace	B1a/b	24,232	
		B1c/B2	- 14,435	
		B8	16,563	
	Total of above	B1a/b	81,425	
		B1c/B2	233,271	
		B8	135,585	
Balance	Overall Requirement v Supply Balance	B1a/b	1,825	0.4
		B1c/B2	259,171	64.8
		B8	49,085	9.8
	Potential new allocations	B1a/b	29250	5.9
		B1c/B2	62650	15.7
		B8	40100	8.0
	Balance taking into account allocations	B1a/b	31,075	
		B1c/B2	321,821	
		B8	89,185	

* Comp, UC and NYS figures exclude Permitted Development losses. These are recorded in a separate row

** Allocations in existing plans (no consent) = allocations in Neighbourhood Plans.

*** Small site losses = non-PD losses on sites under 0.25 hectares. Projection based on previous five years completions. It is assumed that it will take 3 years for permissions recorded to 1/4/16 to complete. An estimate is made of the proportion that may have come through PD had this been available, based on 2014-15 and 2015-16 monitoring data which suggests 27% of small site losses resulted from PD and this figure is removed from the total to avoid double counting.