

## **Buckinghamshire Draft Local Plan Consultation Response - BBF**

Buckinghamshire Business First (BBF) is recognised as the Growth Hub and the Skills Hub for Buckinghamshire and has delivered a wide-ranging programme of business support, combining targeted growth initiatives with strategic sector development. It is also the Employer Representative Body (ERB) for Buckinghamshire and has led on the development of the Local Skills Improvement Plan. BBF's integration with education providers, has helped businesses access cutting edge research and skills. Over half of the 31,000 businesses in the county are engaged with BBF activity and 74% of private sector employment in Buckinghamshire is within those businesses.

Buckinghamshire Business First welcomes the opportunity to respond to Buckinghamshire Council's Draft Local Plan Consultation. As the most representative voice of the county's business community, BBF is committed to supporting policies that drive sustainable economic growth, enhance productivity, and ensure Buckinghamshire remains an attractive location for businesses of all sizes and sectors.

Our response focuses on responding to the questions in the following sections of the [draft Local Plan Consultation survey](#):

- Local Plan Spatial Strategies: Spatial Strategy for Employment
- Development Management Policies: Economic Development
- Development Management Policies: Infrastructure

### **Part A: Local Plan Spatial Strategies: Spatial Strategy for Employment**

The Local Plan includes the protection of strategic and key employment sites, the types of location where new employment growth can take place and identifies what amount of new employment land is needed in future.

**Q3) Do you agree with the approaches to employment?**

Please tick (✓) one option

- Yes

☒ - No

- I don't know

*Please give the reasons for your answer*

It is positive that the Local Plan recognises the link between housing and employment space. However, throughout the plan, it will be important to recognise the importance of balancing housing and employment sites, delivering these in proximity and enabling suitable transport infrastructure between housing and employment sites. Affordable housing, and remote locations which make access to labour challenging, have been frequently raised as constraints to growth in the region. It should be noted that several large employers have left the Buckinghamshire area recently highlighting the importance of using the planning system to retain businesses in the county.

While these ideas are reflected in the spatial plan vision, it is critical these are also reflected in the development management policies. BBF's response to the consultation of these, in the next section of this response, has identified several instances where development policies do not support coordination of housing and employment space, or do so in a vague and subjective manner.

Indeed, several businesses have raised concerns that the 46 hectare provision of employment space is insufficient considering the planned 95,000 new homes. The development policies regarding infrastructure, are somewhat generic, and do not reflect the significant infrastructure requirements for successful non-domestic developments.

To conclude, it should be recognised by the local plan that failure to provide suitable employment sites could result in large businesses relocating from Buckinghamshire, with impacts on tax revenue for local government, access to employment opportunities for Buckinghamshire residents, and increased pressure on transport for residents commuting out of the area for work. The local plan should be used as a tool for economic prosperity and growth in the area, rather than becoming a barrier. While these sentiments are partially reflected in the spatial strategy, it is important that they are also reflected in the plan's Development Management Policies.

**Q4) Are there any other approaches to employment that should be considered?**

Please tick (✓) one option

☒ - Yes

☐ - No

☐ - I don't know

*If you answered 'Yes', please identify the other approaches we should consider*

As above, it would be positive to see a greater reflection of the ambitions to coordinate delivery of housing and employment space in the development management policies. That is, while it positive that Objective 7 sets out a need to 'Seek opportunities to link residential and commercial development to encourage local living' and 'Locate new employment spaces close

to good transport connections to ensure residents have access to viable public transport options' this must be reflected in the conditions for allowing development, and in how housing and employment sites are allocated. Furthermore, BBF would suggest that these objectives have been given a lower priority than those regarding residential developments, and that delivery against these objectives does not appear to be a focus area.

To add to these objectives, there should be consideration of the car parking requirements of large commercial developments, recognising that, in the short-term, private car travel is the preferred mode of transport in Buckinghamshire - a predominately rural area.

Further to this, BBF has broader concerns over loss of suitable employment land to housing developments, particularly where employment land is supported by infrastructure or services suitable for commercial activities (such as access to main roads, parking, water etc.) As a result, BBF would recommend a more selective approach to converting commercial land to residential, taking account of the impact on supply of quality commercial space. There are no specific development management policies which would prevent conversion of commercial developments to residential, or which require provision of commercial space as part of a residential development.

The strategy also makes little recognition of the quality of employment space delivered in the county, particularly with consideration to climate change mitigation and adaptation. While the plan includes a commitment to transition to net zero by 2050, this is not reflected in the Development Management Policies for employment space.

Finally, the success of the Low Carbon Workspaces programme, delivered by Ngage Solutions in Buckinghamshire, should be noted, as it has demonstrated the value of building energy efficiency on business success, which could be accelerated by policy support for these approaches through the Buckinghamshire local plan.

**Q5) Should the new Local Plan aim to balance new employment land more evenly throughout Buckinghamshire to help meet the needs of local businesses?**

Please tick (✓) one option

☒ - Yes

☐ - No

☐ - I don't know

Please give the reason for your answer

BBF are supportive of this approach. Feedback from businesses, through surveys such as the Buckinghamshire Business Barometer and Buckinghamshire Business Survey 2024, identifies commercial premises availability and costs as a leading barrier to business growth in the county. Therefore, policies which enable greater supply of premises, by reducing restrictions on where development can take pace, would be positive.

However, this policy should not be used to the exclusion of expanding Buckinghamshire's existing Enterprise Zones, business parks, innovation centres, and clusters. It is important that businesses continue to benefit from economies of agglomeration as these clusters grow and become more established, driving productivity growth in the county. Ensuring that these clusters continue to be accessible, through improvements to transport infrastructure, to support agglomeration at these clusters. Given that existing clusters tend to have existing infrastructure suited to businesses, such as access to major roads and digital connectivity, delivering suitable infrastructure at these clusters may be more viable than a more distributed approach across Buckinghamshire.

As a result, while we are supportive of the approach to increase the supply of commercial premises by more distributed development, the benefits of agglomeration from expanding existing clusters should not be overlooked. Particularly where suitable infrastructure and innovation centres are available to support growth of new businesses.

## **Part B: Development Management Policies: Economic Development**

General questions on employment not linked to specific policies. We need to plan for different types of employment sites. This could include incubator space for small businesses, research and innovation, premises for medium-sized businesses (defined as one for 20 – 250 employees), and more support for rural business locations.

### **ECa. Which types of employment sites should we plan for?**

Please tick (✓) all that apply

- Incubator space for small business research and innovation
- Premises for medium-sized businesses
- Locations for rural businesses
- Other (please state below)

### **ECb. Please tell us which towns or other locations you think could help meet the need for new employment sites.**

Sites with access to labour and workforce should be prioritised, as well as sites with existing public transport or infrastructure, particularly considering several large employers leaving the area within the last 10 years or so. As a result, sites in remote locations should not be prioritised, unless infrastructure, or affordable housing, can be provided to support workforce access to the site.

We also strongly support delivery of incubator space for small businesses, given that the market tends not to supply these units due to higher costs to deliver and manage multiple tenants, particularly when compared to larger developments with a single occupier. However, this development management policy does not make it clear how this will be enabled, such as through local authority provision of this space, grants, or other incentives.

We are supportive of expansion of existing Enterprise Zones, building on existing clustering and specialisation in key growth industries. Indeed, Local Development Orders (LDOs) could be effective in these locations, allowing for streamlined development of new employment land in areas already recognised as suitable for local economic development. These have proven successful in business parks in other areas, a prime example being Milton Park in Oxfordshire. We are also supportive of brownfield developments, providing that transport and housing can be supported and delivered alongside this.

While we are supportive of employment sites in rural locations, it is not clear how this will be consistent with the strategic vision to sustain the rural character of Buckinghamshire, unless development is restricted to agricultural buildings only.

Finally, linked to EC4, it would be advisable to introduce specific sites for data centre developments, ensuring these are delivered in optimal sites and are not over provided in the county, avoiding associated opportunity costs regarding local employment (i.e.: employment opportunities which could be created at the site were it not used as a data centre), as well as pressures on electricity and water infrastructure.

### **EC1: Strategic and Key Employment Sites**

This policy sets out the circumstances in which the regeneration and improvement of key employment sites will be supported.

#### **EC1. To what extent do you agree or disagree with the policy approach to strategic and key employment sites?**

Please tick (✓) one option

- Strongly agree
- ☒ - Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- I don't know

Please give the reasons for your answer

We generally agree with this approach, although we note that this does not represent a significant change in existing policy. However, we note that embodied carbon impacts are not considered in either the spatial strategy or these development management policies, such that there is no preference to redevelop existing property to reduce carbon costs, or to retrofit

existing employment spaces to improve their energy efficiency. Given that some 80% of the building stock in 2050 will be of existing buildings, according to the Green Building Council, retrofit and upgrades of existing commercial buildings will play a critical role in achieving the stated aim of reaching net zero by 2050.

### **EC2: Other Employment Sites**

This policy protects employment sites. It has an 18-month marketing requirement for the evidence needed to support changes from employment use to other uses.

#### **EC2. Is this an appropriate timeframe?**

Please tick (✓) one option

- Yes

☒ - No

- I don't know

Please give the reason for your answer

While it is positive that protections on B2 and B8 uses will ensure good supply of these units in future, BBF would like to express some concerns over the barriers to redevelopment this could create in locations where these use classes are no longer viable. This could lead to vacancy rates of commercial property in locations which are no longer viable for B2 or B8, and the policy requirements for redeveloping this space could impact their market value. Reducing the market requirement period would reduce the potential impact on property values, while also ensuring suitable protections for the supply of these use classes.

In conclusion, the local plan should recognise that it will remain in effect until 2035, and should recognise that market requirements for commercial space will naturally vary over time. As a result, we are supportive of policies which allow for flexibility in the use class of commercial developments, which also protect existing supply from redevelopment into residential. Local Development Orders could be used to facilitate this, subject to them being implemented in suitable employment sites.

### **EC3: Skills and Local Employment**

The policy states that new housing developments of over 100 dwellings or 1,000 square metres of office, industrial or storage/distribution floorspace should have a component that delivers skills and employment for local workers. The policy also applies to new data centres.

#### **EC3a. Do you agree that the threshold for new developments of 100 or more dwellings or 1,000 square metres or more floorspace is appropriate?**

Please tick (✓) one option

- Yes

- No

- I don't know

*Please give the reason for your answer*

BBF believe that this threshold is too low, given that smaller businesses leading on projects of this size will be unlikely to have sufficient resources and margin to provide skills programmes to local residents. Furthermore, the administration burden of verifying local employment will likely impact profit margins, to the point of making these small developments unviable. Finally, it has been noted that the definition of local employment was not raised in the policy, reducing the ability of businesses reliably verifying compliance with the policy. Furthermore, requirements to use a proportion of local materials is quite vague, and would be difficult to for a business to prove they have used locally sourced materials; their cost may also impact the viability of the development. While there are certainly cost and environmental benefits from using materials extracted locally, limited availability of minerals to extract could make developments unviable. This lack of clarity may further deter small-scale developments, given the elevated risk of non-compliance with imprecise regulatory requirements.

We would recommend that such policies should be used relative to the ability of the developer to implement them, or used exclusively on large projects, such that small developers are not disproportionately impacted by the associated costs of compliance. Organisations such as BBF and the Bucks Skills Hub should be used to support developers to deliver against these requirements, minimising their costs of identifying local training schemes, and costs of identifying local businesses to use in the given project.

**EC3b. Should this policy be extended to other types of major developments, e.g. retail or other employment-generating developments?**

Please tick (✓) one option

- Yes

- No

- I don't know

*Please give the reason for your answer*

Yes, it would be preferable that this policy applied to major developments, with a larger floorspace threshold. It could also be useful to implement these policies on projects of national economic significance, but limited local employment growth, such as data centres. Indeed, the scale of data centre developers is sufficient for supporting local employment and skills initiatives, as well as this activity compensating for the low employment levels of data centre developments. However, this remains contingent on the costs of compliance being minimised, and developers having clarity of the reporting requirements to demonstrate support of local employment and skills provision.

**EC4: Data Centres**

**EC4. To what extent do you agree or disagree with our policy approach to the**

**development of data centres?**

Please tick (✓) one option

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree**
- Strongly disagree
- I don't know

*Please give the reasons for your answer*

As set out previously, it would be advisable to introduce specific sites for data centre developments, ensuring these are delivered in optimal sites and are not over provided in the county, consistent with point f). Specifying locations would provide the market with more assurance of feasible developments, while also helping to avoid development in locations with associated opportunity costs regarding local employment (i.e.: employment opportunities which could be created at the site were it not used as a data centre), as well as pressures on electricity and water infrastructure.

Furthermore, linked to policy EC3, it may be necessary to include a requirement for data centre developments to make provision for local digital skills training provision, as well as support local digital technology sector employment. This would be useful for addressing the issue of local employment opportunity cost from data centres, compared to other developments, while also contributing to growth in employment and enterprise in an Industrial Strategy 2035 priority area. Data Centre developers are likely to have specialist knowledge in support digital skills and enterprise, but the definition could be broadened to other training and employment provision locally, such as construction and engineering.

**EC5: Silverstone Circuit and Silverstone Park Enterprise Zone**

**EC5. To what extent do you agree or disagree with our policy for the future of Silverstone Circuit and Silverstone Park Enterprise Zone?**

Please tick (✓) one option

- Strongly agree
- Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree
- I don't know

*Please give the reasons for your answer*

BBF members expressed no strong views on policies regarding Silverstone Park Enterprise Zone, and are supportive of continued development of the site. We are also supportive of the recognition of Silverstone Park as a key tourism asset of the local economy.

#### EC6: Westcott Venture Park Enterprise Zone and Strategic Employment Site

EC6. To what extent do you agree or disagree with our policy for the future of Westcott Venture Park Enterprise Zone and Strategic Employment Site?

Please tick (✓) one option

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- I don't know

*Please give the reasons for your answer*

BBF have significant concerns with the clarity of the wording in this policy, as well as the impact of the ambiguity on critical issues facing the site, namely workforce access and proximity to the site.

Firstly, the policy under 1d) states that 'd) Small scale private market housing to enable workers to live closer to the site provided that the level of housing does not prejudice the employment function of the site.' It is highly unclear what the definition of small scale is, whether this housing will be on the site or nearby, whether this housing will be affordable. Plus, while it can be assumed that market forces will ensure such housing provision is used by employment of the Westcott site, it is not clear how a developer would evidence this, and how it could be verified.

Furthermore, section 2d) states that development on the site '... should not harm the rural and visual character of adjoining countryside.' It is unclear which developments on the site would not violate this requirement, given that B2 and B8 developments required to support employment in this specialised engineering cluster would be inconsistent with a rural visual character.

#### EC7: Pinewood Studios

EC7. To what extent do you agree or disagree with our policy for the future of Pinewood Studios?

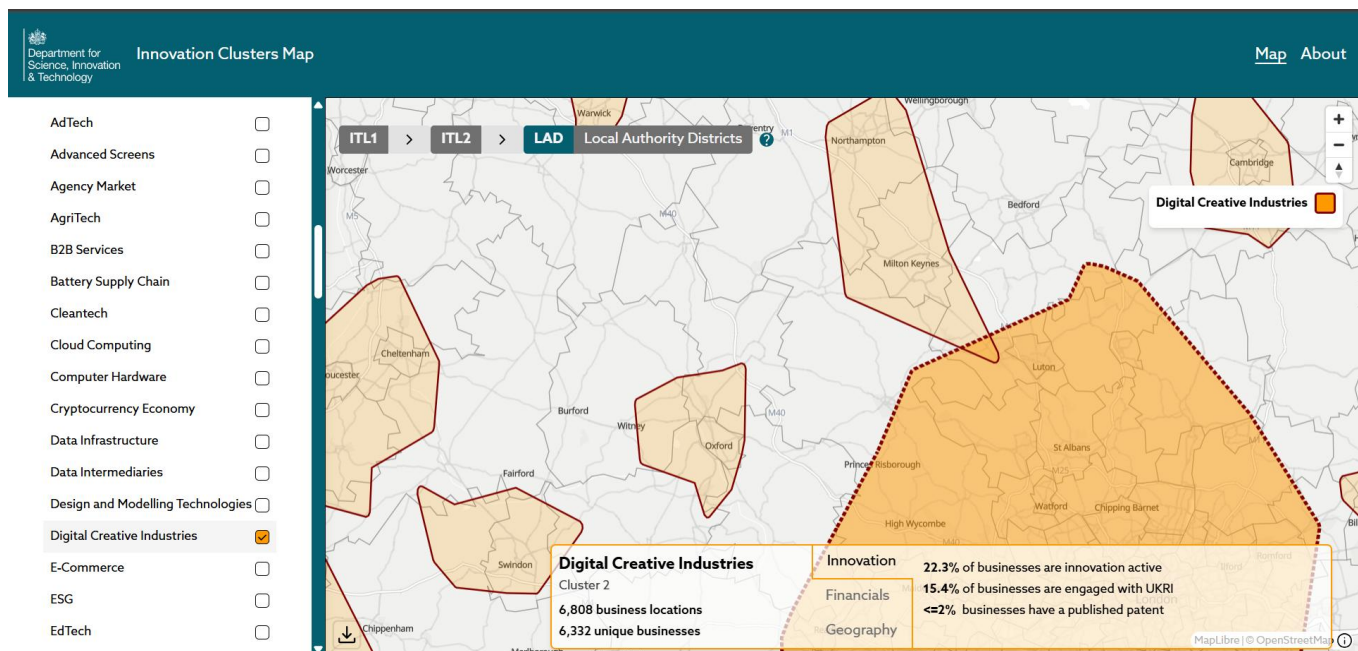
Please tick (✓) one option

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree

- Strongly disagree
- I don't know

*Please give the reasons for your answer*

While BBF are supporting the growth of the Pinewood cluster, it would be useful for the policy to recognise studio space and clusters beyond Pinewood, such as Apple Studios in Aylesbury, as well as around Milton Keynes. According to the Department for Science, Innovation, and Technology's Innovation Cluster Map, updated for 2025, it should be noted that the digital creative cluster centred on London extends beyond Pinewood studios to much of the Buckinghamshire county area. Therefore, recognition of development of film, high end television, and digital creative technology should also extend beyond the Pinewood Cluster.



Source: [DSIT, 2025](#)

## EC8: Rural Diversification

EC8. To what extent do you agree or disagree with the policy approach to rural diversification?

Please tick (✓) one option

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- I don't know

*Please give the reasons for your answer*

BBF are supportive of the redevelopment of rural buildings to increase supply of suitable commercial premises. However, it may be necessary for the policy to include requirements regarding supporting infrastructure, given that redevelopment of rural commercial units may incur additional utilities, parking, transport connectivity etc.

#### EC9: Tourism

EC9. To what extent do you agree or disagree with the policy approach to tourism in Buckinghamshire?

Please tick (✓) one option

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- I don't know

*Please give the reasons for your answer*

There is some confusion regarding why hospitality and tourism developments should be subject to a shorter marketing period than B2 and B8, proposed under EC2 as 18 months. This is inconsistent with the intention to provide special protections for these units, to ensure good supply.

Furthermore, there is no recognition of the importance of providing affordable housing for staff on existing or future sites. Hospitality businesses, particularly large hotels, have raised this with BBF as a constraint on recruitment and growth, given the rural nature of the county acts as an access barrier for workers without access to transport. While this is implied under '...existing tourism and visitor facilities' it may be necessary to include staff accommodation within the definition of tourism and visitor economy development in Buckinghamshire.

#### EC10: Retail Hierarchy

*The National Planning Policy Framework requires us to define a hierarchy of town centres as part of the promotion of their long-term vitality and viability.*

EC10. To what extent do you agree or disagree with the retail hierarchy?

Please tick (✓) one option

- Strongly agree
- Agree
- Neither agree nor disagree

- Disagree
- Strongly disagree
- I don't know

*Please give the reasons for your answer*

While BBF recognises the retail hierarchy is based on the scale and significance of retail destinations, it may be useful to also consider Opportunity Bucks wards, and areas of relative deprivation, when determining the hierarchy. As a result, areas of relative deprivation would gain greater priority for retail developments, which could be useful.

#### EC11: Development Within Buckinghamshire's Centres

##### EC11. Do you agree with the approach to uses within and outside primary shopping frontages?

Please tick (✓) one option

- Yes
- ☒ - No
- I don't know

*Please give the reason for your answer*

BBF believes that this approach is too strict, and excludes other valid uses of shop frontages which protect the vibrancy of town centres. For example, dentist, GP surgeries, gyms, museums, and other uses of shop frontages would not be permitted under this scheme, and the costs of moving these uses to upper floors could undermine the commercial viability of these uses in town centres. As a result, this risks increasing vacancy rates in town centres, by prohibiting these other valid uses of the space. Indeed, the future of the high street remains an area of uncertainty, such that it may be helpful to allow for greater flexibility into the use of space to reflect changing demand for high street services.

#### EC12: Development for Main Town Centre Uses Outside Buckinghamshire's Centres

##### EC12. To what extent do you agree or disagree with the policy approach to this development?

Please tick (✓) one option

- Strongly agree
- Agree
- ☒ - Neither agree nor disagree
- Disagree
- Strongly disagree
- I don't know

*Please give the reasons for your answer*

BBF consider that this policy is broadly consistent with NPPF. However, the 400sqm threshold may be set too low, given that various land intensive developments would greatly exceed this limit, such as strategic warehousing units of over 9,000 sqm. As a result, it may be necessary to increase this limit to avoid impacts on small businesses, while ensuring that impact assessments are necessary for warehousing or other land intensive commercial developments.

## **Part B: Development Management Policies: Infrastructure (IN)**

IN1. To what extent do you agree or disagree with the policy approach to infrastructure delivery?

Please tick (✓) one option

- Strongly agree
- Agree
- Neither agree nor disagree
- ☒ - Disagree
- Strongly disagree
- I don't know

*Please give the reasons for your answer*

BBF agrees with the policy in principle, but we recognize the policy does not go much further than what is required under NPPF. There could be a missed opportunity here to deliver infrastructure alongside commercial development which protects its long-term viability and growth, as well as ensuring the infrastructure remains competitive with other commercial premises search areas. For example, delivery of grid upgrades to accommodate future growth at employment sites, standards over digital connectivity, parking etc. It is positive that long-term maintenance is considered as part of the policy.

IN2: Water Infrastructure

IN2. To what extent do you agree or disagree with the policy approach to water infrastructure?

Please tick (✓) one option

- Strongly agree
- Agree
- Neither agree nor disagree

- Disagree

- Strongly disagree

- I don't know

*Please give the reasons for your answer*

It may be helpful for the policy on water supply to be more specific, recognizing that different use classes will require different water supply requirements, and that this should be specified by the development. Furthermore, developers should be required to evidence the sustainability and reliability of water supply to the development, to be consistent with IN1. For example, BBF has received intelligence that some businesses have insufficient water to operate fire suppression systems on their premises, with consequences for insurance premiums and their ability to invest in growing their business.

We are broadly supportive of initiatives concerning wastewater management. However, it may be beneficial to consider the planning system as a potential mechanism for transitioning away from combined sewage systems, which are prone to discharging wastewater into the environment during flood events. It is essential that developments acknowledge and assess the risk of wastewater discharge into waterbodies, rather than solely demonstrating that such discharge will not occur under standard operating conditions or capacity thresholds.

### IN3: Telecommunications Infrastructure

IN3. To what extent do you agree or disagree with the policy approach to telecommunications infrastructure?

Please tick (✓) one option

- Strongly agree

- Agree

- Neither agree nor disagree

- Disagree

- Strongly disagree

- I don't know

*Please give the reasons for your answer*

While these proposals are acceptable, there may be a missed opportunity in this policy to future proof developments for digital infrastructure. Namely, full fibre to the premises (FTTP) should be a standard Buckinghamshire aims for, to best support growth of innovative businesses, and allow Buckinghamshire to remain competitive with other enterprise regions, particularly the Enterprise Zones and clusters identified in the development management policies. According to the [Ofcom Connected Nations 2024 report](#), only 63% of premises are

served by a FTTP connection in Buckinghamshire, below the 69% rate for the UK. The report also notes increasing take-up by residential and business customers.

Importantly, it should be noted that FTTP leased lines on commercial developments may not be viable for all developments, or required by all occupiers. Developers should be given flexibility when installing FTTP leased lines. Nevertheless, requiring the appropriate cable ducting to be installed in new commercial developments would sufficiently future proof these developments, allowing full fibre connections to be installed in response to occupier demand.

Furthermore, provision of mobile, or cellular, connectivity should also be recognised by this policy. Poor mobile connectivity also acts as a barrier to productivity for businesses when away from their premises, and can be unreliable in parts of the county. The planning system could be used to enhance cellular connectivity through policy which favours the supporting infrastructure, which would also make the county a more competitive location in which to do business.